

WTSS 273B Buffalo, New York
Allocation Considerations

This Engineering Report is part of an application for facilities changes for FM station WTSS at Buffalo, New York, by Entercom Buffalo License, LLC. The proposed operation will be on FM Channel 273B (102.5 MHz) with an effective radiated power of 110 kilowatts (20.41 dBk) at an antenna height above average terrain of 355 meters.

WTSS is a “superpowered” Class B station presently operating with 110 kW ERP at 408 meters HAAT. By this application, WTSS proposes continued operation at its licensed transmitter site, but with an antenna radiation center 53 meters lower than the present antenna.

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class B stations as prescribed in §73.207 of the Commission's Rules, with the following exceptions:

WISY 272A Canandaigua operates as a §73.213(c)(1) facility (3 kW equivalent; 34 dBu F(50,10) does not exceed 98 km) with respect to WTSS. The required “prior rules” spacing between WISY and WTSS is 105 km, 4 km less than the actual 109 km spacing between the two stations. Since WTSS does not propose to reduce this spacing, this application satisfies §73.213 with respect to WISY.

WDCZ 274A Webster operates as a §73.215 short-spaced facility with respect to WTSS. In the application for its present facility, WDCZ was required to demonstrate that it would provide contour protection to WTSS, presuming WTSS operation with maximum Class B facilities of 50 kW ERP at 150 meters HAAT. Since the instant WTSS application proposes no change in transmitter site or Class, only a reduction in antenna height, the allocation circumstances with respect to WDCZ will remain unchanged.

CBLA-FM-4 273A Shelburne, Ontario: The proposed operation is short-spaced to Canadian station CBLA-FM-4 on Channel 273A at Shelburne, Ontario. Under the terms of the Working

Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the required first-adjacent-channel Class B to Class A spacing is 210 kilometers, whereas the distance between the WTSS site and the CBLA-FM-4 site is 207 kilometers. Since the instant WTSS application proposes no change in transmitter site or Class, only a reduction in antenna height, the allocation circumstances with respect to CBLA-FM-4 will remain unchanged.

Channel 273A at Woodstock, Ontario: Channel 273A at Woodstock has long since been deleted by the Canadian authorities. It was initially replaced by Channel 272B as CKDK-FM, which has since been modified to Channel 280C1. Even were Channel 273A at Woodstock still a going concern, the fact that the instant WTSS application proposes no change in transmitter site or Class (only a reduction in antenna height) would mean that the instant application is in no way prejudicial to the Woodstock channel.

Therefore, the instant WTSS application satisfies all domestic and international allocation considerations.

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44444 END OF FM SPACING STUDY FOR CHANNEL 273 44444