

Exhibit 24 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Citadel Broadcasting Company**  
WAAL(FM) Binghamton, New York  
Facility ID 7920  
Ch. 256B 8.7 kW 291 m

Citadel Broadcasting Company (“*Citadel*”) is the licensee of radio station WAAL(FM), Ch. 256B, Binghamton, New York (the “Station”)<sup>1</sup>. WAAL presently operates with 7.1 kW effective radiated power (“ERP”) with an antenna height of 332 meters above average terrain (“HAAT”). The instant application seeks to change the WAAL transmitter location, ERP, and HAAT.

**Allocation Considerations**

With the exception of an existing short-spacing to WAWZ(FM)<sup>2</sup> (Channel 256B, Zarephath, NJ), WAAL is fully spaced according to the criteria specified in §73.207 of the Rules. Because WAAL has remained continuously short spaced to WAWZ(FM) since before November 16, 1964, the Station is “grandfathered” under the provisions of §73.213(a).

The location of the proposed WAAL transmitter site is:

42° 03' 31" North Latitude  
75° 57' 06" West Longitude  
Antenna Registration Number: 1016566

The proposed WAAL transmitter site is 198.02 km distant from the licensed site of co-channel WAWZ, which represents a short-spacing of 42.98 km. This site is 0.68 kilometers west-northwest of the licensed WAAL facility and 0.60 kilometers farther from the WAAZ facility.

Mutual interference is now predicted to exist between these “grandfathered” short-spaced stations. The instant application will demonstrate a slight reduction in interference population<sup>3</sup> and area, both caused and received.

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<sup>1</sup> FCC File Number BLH-6186, Facility ID 7920

<sup>2</sup>FCC File Number BLH-20030702AAO

<sup>3</sup>2000 Census

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As is shown in **Figure 1** and **Figure 2** detailed below, the facility proposed for WAAL is predicted to reduce interference area and population within the protected contours of WAAL and WAWZ, as required by §73.213(a)(2).

<u>Description</u>	<u>Present Interference Area, Population</u>	<u>Proposed Interference Area, Population</u>
WAAL Interference to WAWZ	35.0 sq. km, 257 people	24 sq. km, 133 people
WAWZ Interference to WAAL	241 sq. km, 6,994 people	193 sq. km, 3,679 people
Total Interference	276 sq. km, 7,251 people	217 sq. km, 3,812 people

**AM Facilities**

There is one directional AM broadcast station, WNBF (Binghamton, New York), within 3.2 km of the proposed WAAL transmitter site. *Citadel*, which is also the licensee of WNBF, has a vested interest in assuring proper operation of the WNBF directional antenna system. Because the instant proposal involves utilizing a side-mount antenna on an existing antenna support structure, no increase in tower structure height is proposed. The new transmission line will be properly grounded during the installation. For the reasons stated above, no effect to WNBF is anticipated. Thus, it is believed unnecessary to condition the WAAL Construction Permit with requiring a partial proof of performance of the WNBF antenna system before and after construction. If a waiver of §73.1692 is required, one is hereby requested on behalf of the applicant with respect to WNBF.

**Other Facilities**

The nearest FCC monitoring station is at Canandaigua, New York at a distance of 143.9 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3)(iii) that would suggest consideration of the monitoring station.

**Conclusion**

It is thus believed, based on the foregoing, that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters and contour protection.



