

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WZZO, Bethlehem, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WZZO, Bethlehem, PA, second adjacent channel facility to this translator proposal, is protected from interference within its 54 dBu contour from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contour (WZZO) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.
2. This translator's antenna location is located within the 54 dBu contour (based on 73.333 F(50/50)) of WZZO, Bethlehem, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WZZO. Included as an attachment (W234BM-W232BY 94.7 Palmerton, PA Desired to Undesired Ratios Map) is a map showing that the 69 dBu coverage contour of WZZO encompass the proposed antenna site along with the entire proposed 109 dBu interference contour. The proposed 109 dBu interference contour is 40 dBu greater than the 69 dBu contour of WZZO. This 109 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 109 dBu interference contour of this proposed translator.
3. Given this translator's requested effective radiated power of 10 watts, directional; the predicted 109 dBu interference contour for this proposal would be very small. At any HAAT value, the maximum 109 dBu contour distance for this proposal is 0.08 kilometers towards 0 degrees and less than this in all other directions. Because of the very small

distances and to make this study simple, a uniform non-directional 10 watts will be drawn overstating the 109 dBu contour.

4. This proposed translator site is situated in a sparsely populated area. W234BM-W232BY 94.7 Palmerton, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 109 dBu interference contour of this proposal with no dwellings at all located within this contour. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to WZZO, Bethlehem, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facility, WZZO, Bethlehem, PA.

By: Kevin Fitzgerald, Chief Engineer