

EXHIBIT 15 Technical Statement

The proposed new facility for Gouverneur, NY will operate on channel 213 with an ERP of 1.4 kW and an HAAT of 70 meters.

Exhibit 15 also contains a topographic map on which is plotted the proposed stations 60 dbu service contour, as well as the community of license, Gouverneur, NY.

Exhibit 16 demonstrates compliance with 47 CFR 73.509.

Exhibit 19 shows no interference to Channel 6 TV stations will occur.

Exhibit 21 shows Canadian compliance.

Compliance with the Environmental Protection Act was determined through the use of RF worksheets.

Technical Parameters (Section IV, question 4)

The 60 dbu coverage area of the new facility is 912 km^2 and would serve a population of 13,153 people.

The distance to the 60dbu f(50,50) signal was calculated for 3600 radials spaced evenly every 0.1 degree, and an intercept program was used to determine the coordinates from the distance and bearing. The 60dbu contour thus consists of a 3600-sided polygon. For each US Census Bureau population centroid in the area, a determination was made as to whether the centroid was located in the contour polygon. The population inside the contour is the sum of the populations of the centroids that fall within the contour.

The total area was calculated as $\pi/3600$ times the sum of the squares of the 3600 radial distances.