

#### SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WKKV-FM, Racine, WI and the predicted interference to the 60 dBu contour of the second-adjacent W264CT, Shorewood, WI is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WKKV-FM, Racine, WI and W264CT, Shorewood, WI, second adjacent channel facilities to this translator proposal, are protected from interference within their 54 dBu and 60 dBu contours 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 contours (WKKV-FM & W264CJ) 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 WKKV-FM, Racine, WI and within the 60 dBu contour (based on 73.333 F(50/50)) of W264CT, Shorewood, WI. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WKKV-FM & W264CT. Included as an attachment (W262CJ 100.3 Milwaukee, WI Desired to Undesired Ratios Map) is a map showing that the 69 dBu coverage contour of WKKV-FM & the 90 dBu coverage contour of W264CT encompasses the proposed antenna site along with the entire proposed 109 dBu and 130 dBu interference contours. As the proposed 109 dBu interference contour is 40 dBu greater than the 69 dBu contour of

WKKV-FM then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this interference contour for this proposed translator. It should be noted that a showing of no population within the 109 dBu contour also proves no population within the 130 dBu contour which is even smaller than the 109 dBu contour. Only the 109 dBu showing will be made.

3. Given this translator's requested effective radiated power of 99 watts Directional; the predicted 109 dBu interference contours for this proposal would be small. At any HAAT value, the maximum 109 dBu contour distance for this proposal is 0.25 kilometers (250 meters) towards 238 degrees and smaller in all other directions.

4. This proposed translator antenna is to be situated 171 meters above ground on a 369.7 meter tall TV-radio tower. Enclosed as W262CJ Vertical Freespace CA2CP, is a study showing the free space signal distance based on the Freespace Equation and factoring in the Vertical Pattern (downward radiation) of the proposed CA2CP Antenna. Based on this study, no part of the 109 dBu contour ever reaches the ground level. As such, no interference would be caused at any location on the ground. 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 WKKV-FM, Racine, WI and W264CT, Shorewood, WI 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 facilities, WKKV-FM, Racine, WI and W264CT, Shorewood, WI.

By: Kevin Fitzgerald, Technical Consultant