

WAHS-FM
89.5 MHz
Avondale School District
Auburn Hills, MI

Exhibit – 21 International Borders (Canada)

US – Canadian Working Agreement

WAHS is located 38 km from the US/Canadian Border. WAHS occupies an allocation listed in table B of the US – Canadian Working Agreement at channel 208A in Auburn Heights, Michigan. The designation *43 is assigned indicating a short spaced limitation of 2kW with antenna HAAT of 136.5 meters. The proposed facilities differ somewhat from this agreement in that we are specifying a ERP of 2.6 KW. However, this proposal will yield coverage contours that are within equivalent coverage contours of the existing allocation.

This proposal is short spaced with CBEFM on 89.9 MHz (second adjacent) in Windsor Ontario. The interference zones have been plotted in E-12B to E-12D of this exhibit in accordance to the US – Canadian Working Agreement. These contour plots overlay a map (Detroit Aeronautical Sectional) for which the contrast has been reduced to better show contour lines.

In the Case of the Chatham Allocation, Exhibit –12B shows the opposing contours. In the US – Canadian Agreement, the Chatham allocation (207B) has the designation of *12 which is limited to 40kW with an HAAT of 122 meters. The plotted contour assumes these conditions. The Chatham Allocation is first adjacent with WAHS. There is no overlap between the New Proposal in Chatham, Ontario and the WAHS proposal. Though not applicable to the US – Canadian Working Agreement, there is not prohibited overlap per the rules in section 73.509. Note: Exhibit – 21C has been deleted.

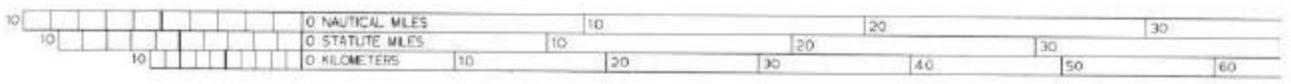
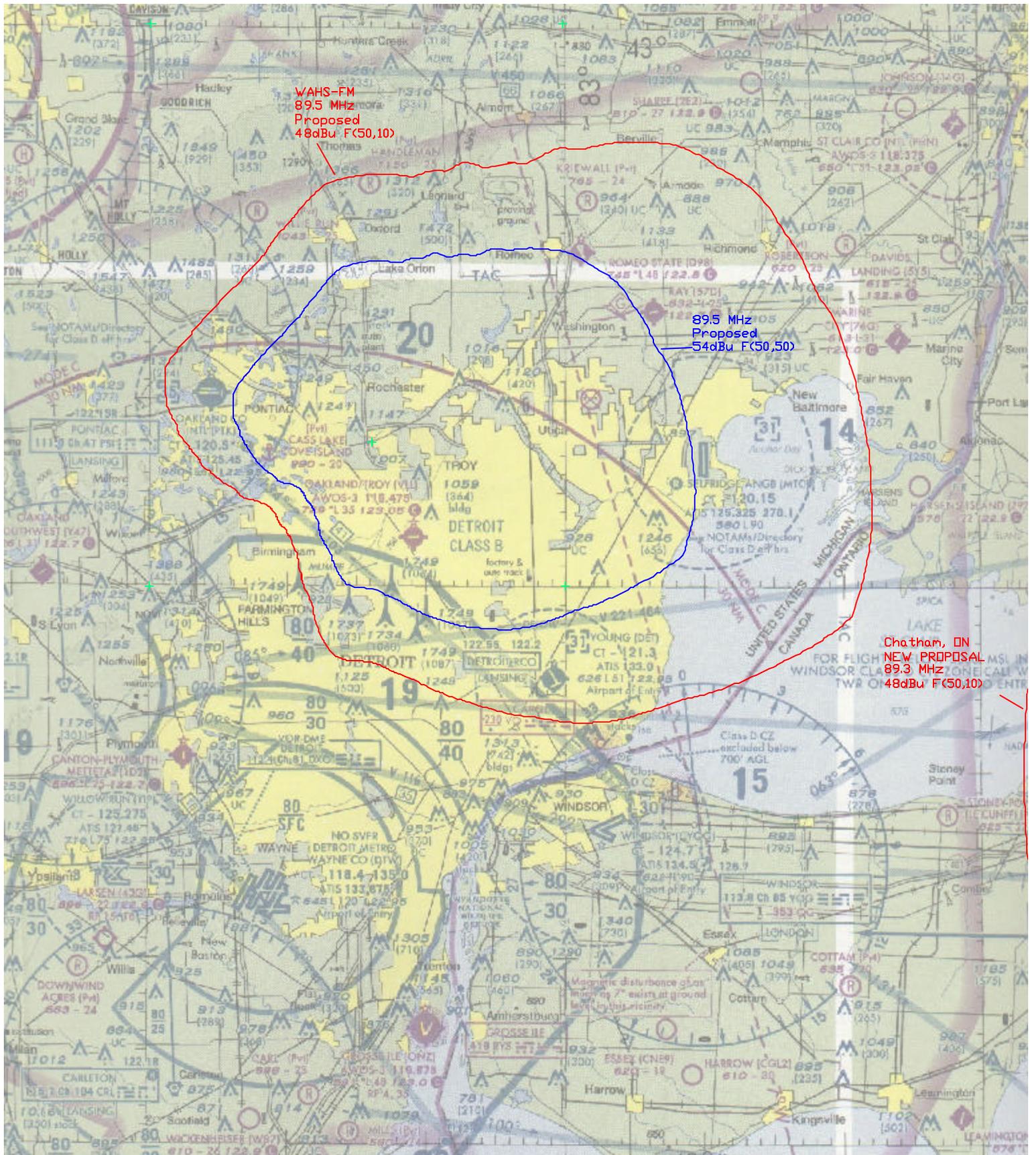
In the case of CBEFM 89.9 MHz (second adjacent), there will be an interference zone caused to CBEFM near the WAHS transmitter site as defined in the US – Canadian Working Agreement. The zone is shown in Exhibit -21D. This zone is entirely within US territory. Though not applicable to the US – Canadian Working Agreement, the plot on Exhibit – 21E was done using the rules in section 73.509. Notice there is a small area of interference caused to WAHS from CBEFM (relative to 73.509).

The actual interference should be minimum in both cases. Due to advancements in receiver technology in recent years, the actual adjacent channel interference received will be minimized. Most consumer electronics,

such as home stereo receivers, automobile receivers and many portable receivers use digital syntheses, which is referenced to a quartz crystal. This eliminates problems such as AFC (Automatic Frequency Control) capture that was present in most older technology receivers. However, some older technology receivers may still experience this problem. But, newer technology receivers have mostly replaced them.

We are requesting to operate short spaced with these two stations as indicated.

If the FCC deems necessary, we request that the FCC forward this application to the Canadian Government for review and concur with the FCC review.



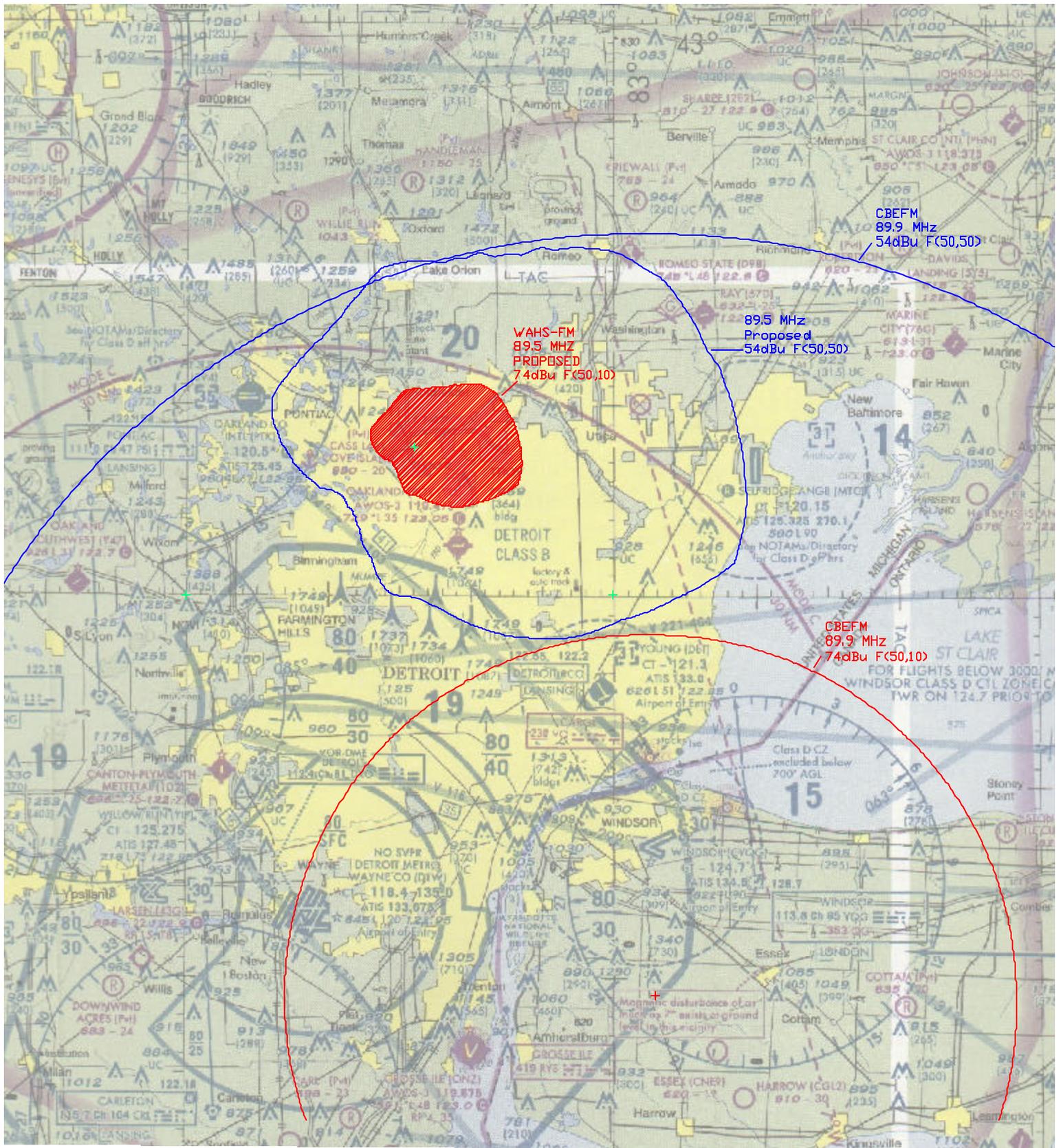


Exhibit- 21D

WAHS-FM
89.5FMAuburn Hills, MI
Avondale SchoolDistrict

CBEFM 89.9 Mhz
Windsor, ON

