

FAMILY LIFE MINISTRIES, INC.
APPLICATION FOR NEW NCE-FM TRANSLATOR
CHANNEL 234D (94.7 MHz) – BRIGHTON, NY

EXHIBIT E-12B
REQUEST OF WAIVER OF 2nd and 3rd ADJACENT OVERLAP

This application provides the required protection to all licensed co-channel and adjacent channel stations by the contour method with the exception of a second adjacent (WNVE) and a third adjacent (WZNE). In searching for a frequency, 94.7 (channel 234) was found to be within the guidelines of the FCC rules.

Using figure 1 of 73.333 (f50/50 chart) and the licensed parameters of WNVE, it was determined that the signal strength of WNVE at the proposed translator site is 80dbu. Contour protection generally requires that the proposed translators interfering contour not overlap the 54dbu contour of the protected class B station. In this case the interference contour would normally be the 94dbu contour since WNVE operates on channel 236B and this proposal is for channel 234 (second adjacent). For actual interference to occur however, the interfering signal must be 40dbu or more above the signal of the protected station. In this situation, that interprets to 80dbu plus 40dbu which equals 120dbu. As seen in exhibit 12D, the 120dbu contour from the proposed translator extends out a distance of .02km, or 63 feet from the antenna, as the proposed Effective Radiated Power is only 10 watts. There are no homes within this interfering contour as seen in exhibit 12E, as this site is home to several FM and TV stations.

WZNE operates on channel 231A and is located on the same tower as this proposed translator. In order for actual interference to occur to a third adjacent facility, the interfering contour must be at least 40dbu greater than the station in question. WZNE's signal at this proposed site is greater than 100dbu. In order for interference to exist, this proposed translator must have a signal greater than 140dbu. This signal is not generated from this proposal as seen in Exhibit 12E, therefore no population would be affected.

We believe that we have demonstrated that the proposed translator station will not cause actual interference to WNVE or to WZNE on the ground or in any building at or adjacent to the antenna location. Due to the above, we respectfully request a waiver of the normal contour protection requirements for the reasons stated and the fact that there is no population within the small overlap area which occurs within 63 feet (the distance to the 120dbu contour).

In requesting this waiver, we understand that a translator may not cause interference to any full service or previously authorized translator station. If interference does occur, we will be required to correct the interference by reducing power, changing antenna patterns or terminating operations altogether. We also understand that the rules permit us to submit an application which does not meet the normal contour requirements if we demonstrate that "no interference will occur" due to "lack of population or such other factors".