

Exhibit B-16
WADI-FM Corinth, Mississippi
Allocation Study

Background

The proposed operation of WADI meets the co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules, with the exception of grandfathered "pre 1989" short-spacings to co-channel stations WAFM 237A Amory and WTBG 237A Brownsville.

Prior to the Commission's adoption of 6 kilowatts as the maximum ERP for Class A stations, WADI, WAFM, and WTBG operated as fully-spaced 3 kilowatt equivalent Class A stations. (The "prior rules" spacing for co-channel Class A stations was 105 kilometers.) In 1997, WADI, WAFM, and WTBG entered into an agreement consenting to the upgrade of the stations to 6 kilowatt equivalent operation and filed applications for mutual increase in facilities per §73.213(c)(2) of the Commission's Rules. All stations were issued construction permits for 6 kilowatt equivalent facilities, but WADI never filed a license application for its upgrade and that permit has expired.

At present, both WAFM and WTBG operate with ERP's in excess of 3 kilowatts, WAFM with 6 kilowatts at 83 meters HAAT, WTBG with 5 kilowatts at 46 meters HAAT. WADI is authorized for operation with 3 kilowatt equivalent facilities of 1.5 kilowatts at 144 meters HAAT.

The instant application is being filed in order to implement a power increase for WADI, to a level greater than 3 kilowatt equivalent, but less than 6 kilowatt equivalent. The proposed facility, with 2.6 kilowatts at 144 meters HAAT, will increase the population which will receive interference-free service from WADI, but will not cause interference to either WAFM or WTBG.

No Interference Caused to WAFM or WTBG

As is depicted on the attached Allocation Study Map #1 (and detail map), the proposed WADI 40 dBu F(50,10) interfering contour will not overlap the 60 dBu F(50,50) contours of WAFM or WTBG. Therefore, grant of the proposed WADI facility will not cause interference to those stations.

Increased Interference-Free Service for WADI

Grant of the proposed 2.6 kilowatt facility will result in an increase in the population receiving interference-free service from WADI. Allocation Study Map #2 depicts the authorized and proposed WADI 60 dBu F(50,50) contours in relation to the 40 dBu F(50,10) interfering contours of WAFM and WTBG.

The proposed WADI facility will receive no overlap, and therefore no interference, from WTBG. However, both the authorized and proposed WADI contours receive overlap from WAFM. To determine the extent of the resulting interference, a contour ratio analysis has been conducted to determine the areas where the undesired F(50,10) field strength from WAFM exceeds a value 20 dB below the desired F(50,50) field strength from WADI. This study has been conducted for both the authorized and proposed WADI facilities. The results are shown on Allocation Study Map #3 and summarized in the table below. All population figures are derived from the 2000 Census using block centroid methodology.

WADI BLH-2002112ABJ	Area	Population
60 dBu Service Area	1,905 km ²	50,533
Interference-Free Service	1,900 km ²	50,483
Received Interference Area	5 km ²	50

(It should be noted that the existing overlap received from WAFM is of such a limited extent that there is effectively no difference between the overlap area and the interference area.)

WADI Proposed	Area	Population
60 dBu Service Area	2,441 km ²	58,615
Interference-Free Service	2,423 km ²	58,282
Received Interference Area	18 km ²	333

Based upon this analysis, the proposed WADI facility will provide interference-free service to an additional 7,799 persons when compared with the authorized WADI facility, an increase of 15%.

While the WADI area and population subject to received interference appears to increase, all of this new interference area is located outside the present 60 dBu service area of WADI. Therefore, grant of this proposal will not result in the creation of any actual “new” interference, since residents of the interference area do not presently receive service from WADI.

In BPH-20010227AAM (granted August 9, 2002), the Commission authorized a power increase for FM station KVFG at Victorville, California, under similar circumstances. KVFG and co-channel KTPI Tehachapi had operated as fully-spaced 3 kilowatt equivalent stations. In 1990, KVFG and KTPI were granted “mutual upgrade” construction permits,

but only KTPI constructed and licensed its upgraded facility; the KVFG upgrade permit was allowed to expire. In BPH-20010227AAM, the Commission authorized an increase by KVFG to 6 kilowatt equivalent facilities which maintained or reduced interference caused to KTPI. This modification increased the area and population subject to received interference by KVFG, but those new areas of received interference were outside the existing KVFG interference-free service area. Therefore, grant of the KVFG proposal did not result in the creation of any actual “new” areas of interference.

Conclusions

The proposed 2.6 kilowatt operation will permit WADI to increase its interference-free service population by an additional 7,799 persons, or 15%, while not causing any interference to the existing 3+ kW operations of WAFM and WTBG.

Based upon this analysis, therefore, grant of the facilities proposed in the instant application would be in the public interest, and would be consistent with prior Commission action.







