

Exhibit 15

Raleigh “de minimis” Waiver Justification

WVHC is second adjacent to the proposed facility. The negative value of the “*IN*” column combined with the positive value in the *OUT* column in Exhibit 15 show that the proposed facility receives prohibited contour overlap from WVHC, but does not itself interfere with the signal of WVHC. Thus there will be no loss of coverage to WVHC. The proposed facility will experience a very significant (five times) increase in its coverage.

The F(50,50) signal at the transmit site of WVHC from the **present** licensed facility is only 57.04 dBu (21.04 km at 207 degrees from WMHU to WVHC, giving 0.153 kW at 241.1 m HAAT). Thus none of the population in the vicinity of WVHC is currently receiving WMHU at a protected signal level.

The screenshot shows the FCC Curves software interface with the following settings and values:

Contour	Units	Band	ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
<input checked="" type="radio"/> F(50,50) Protected	<input checked="" type="radio"/> Metric Units	<input checked="" type="radio"/> FM-Low VHF TV	0.153 (0)	241.1	57.24	21.04
<input type="radio"/> F(50,10) Interfering	<input type="radio"/> English Units	<input type="radio"/> High VHF TV				
<input type="radio"/> UHF TV						

Buttons: Find ERP, Find HAAT, Find Contour, Find Distance

The F(50,50) signal at the transmit site of WVHC from the **proposed** facility is 70.16 dBu (12.35 km at 168 degrees from the proposed facility to WVHC, giving 0.380 kW at 236.0 m HAAT).

The screenshot shows the FCC Curves software interface with the following settings and values:

Contour	Units	Band	ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
<input checked="" type="radio"/> F(50,50) Protected	<input checked="" type="radio"/> Metric Units	<input checked="" type="radio"/> FM-Low VHF TV	0.38 (0)	236	70.1566	12.35
<input type="radio"/> F(50,10) Interfering	<input type="radio"/> English Units	<input type="radio"/> High VHF TV				
<input type="radio"/> UHF TV						

Buttons: Find ERP, Find HAAT, Find Contour, Find Distance

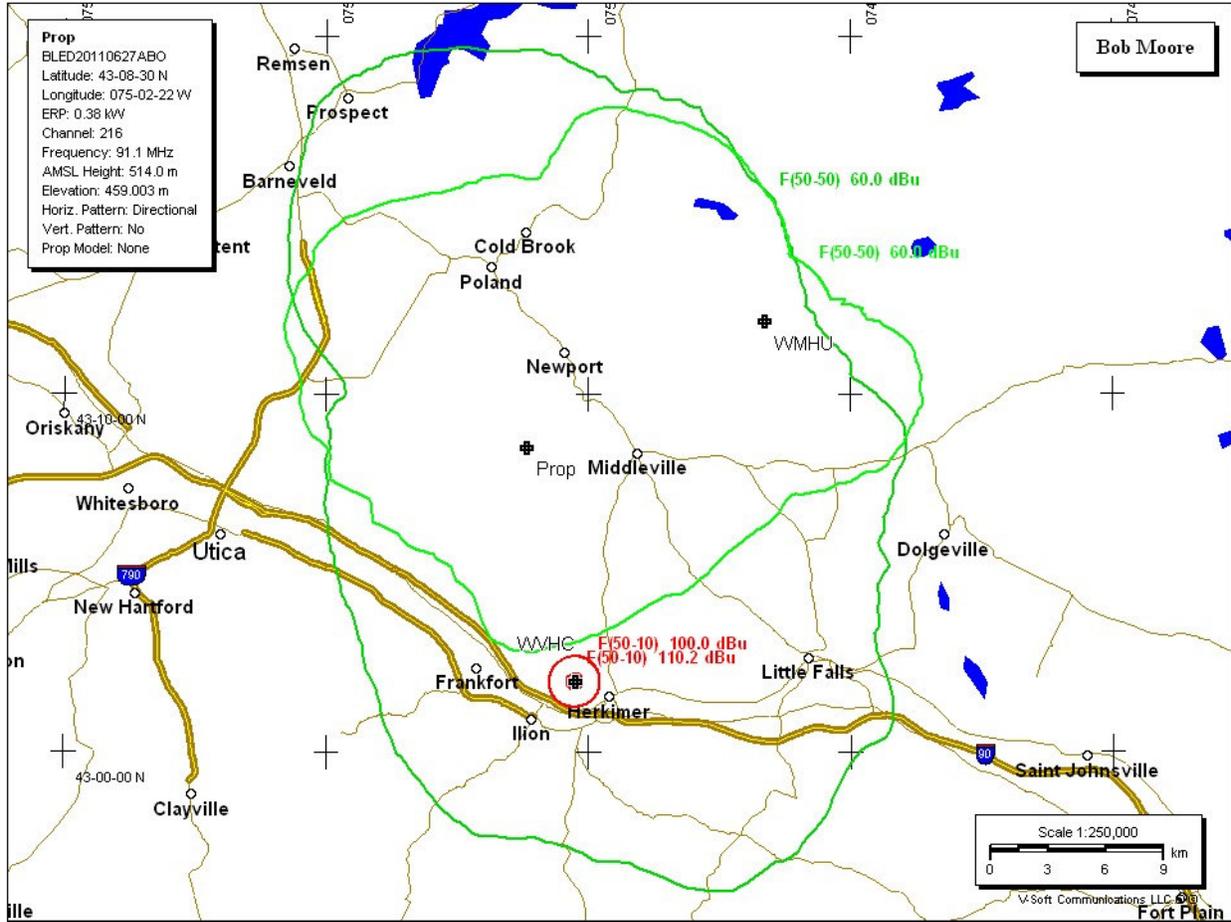
The appropriate interfering contour to protect a 70.16 dBu signal is 40 dB greater which is 110.16 dBu. There is a tiny island, 407 meters in radius, in the new coverage area of the proposed station where a few listeners will receive interference to the proposed station from WVHC.

The screenshot shows the FCC Curves software interface with the following settings and values:

Contour	Units	Band	ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
<input type="radio"/> F(50,50) Protected	<input checked="" type="radio"/> Metric Units	<input checked="" type="radio"/> FM-Low VHF TV	0.35 (0)	-35	110.16	0.407396
<input checked="" type="radio"/> F(50,10) Interfering	<input type="radio"/> English Units	<input type="radio"/> High VHF TV				
<input type="radio"/> UHF TV						

Buttons: Find ERP, Find HAAT, Find Contour, Find Distance

Population and area for relevant contours

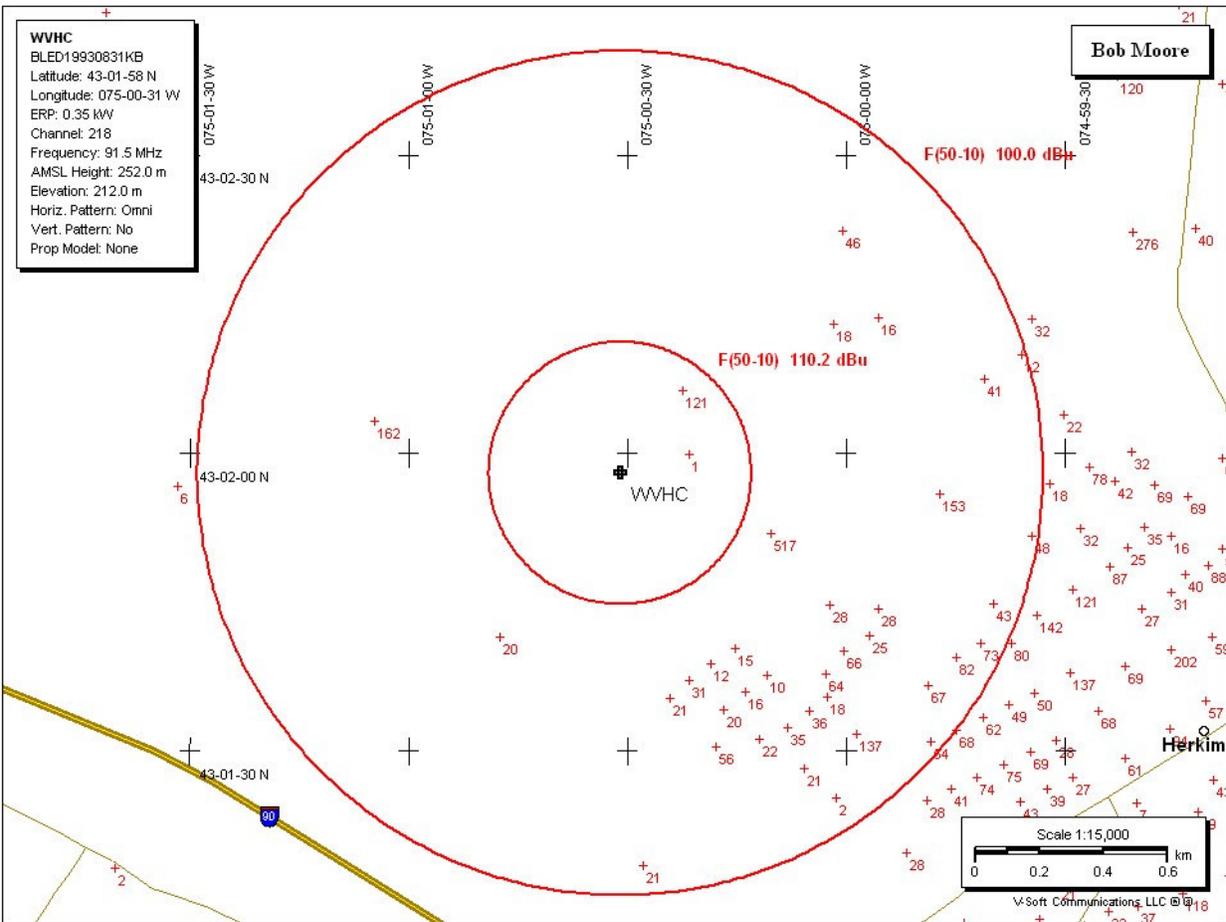


Population Report for All Contours

Population Database: 2010 US Census (PL)

	Population	Area (sq. km)
WMHU (216) [Cold Brook, NY] FCC F(50-50) 60.00 dBu	10,579	587.0
Prop (216) [Cold Brook, NY] FCC F(50-50) 60.00 dBu	50,161	1042.1
WVHC (218) [Herkimer, NY] FCC F(50-10) 100.00 dBu	2,158	5.4
FCC F(50-10) 110.16 dBu	122	0.5

Data from VSoft Probe3



Gain in population and area from present WMHU to proposed facilities

Population gain 39,582 (50,161-10,579)
 Area gain 455.1 sq km (1042.1- 587.0)

Percentage of the gained population/area of WMHU lost due to WVNC

Percentages using 110.16 dBu contour (from D/U processing)
 Population 0.3% (122 /39,582)
 Area 0.1% (0.5/ 455.1)

Percentages using 100.00 dBu contour
 (standard 2nd adjacent interfering contour)
 Population 5.4% (2,158 /39,582)
 Area 1.2% (5.4/ 455.1)

The applicant understands that any future modifications by WVHC’s facilities would not be construed as a per se modification of WMHU’s license. Thus WVHC can choose to expand and increase the interference to WMHU, should they so desire.

This clearly qualifies as a “**de minimus**” consideration given the significant increase this allows in the coverage area and population of the proposed station, marred only by a tiny area where there is no improvement. The applicant thus respectfully requests the customary waiver for this area of interference to his own signal.

See the FCC’s April 21, 1991 decision, Educational Information Corporation, 6 FCC Rcd 2207 for further details on this established policy.