

Rochester Free Radio, Inc.
Application for New LPFM Station
Facility ID 192286 -- Channel 292 -- Rochester, NY
Exhibit 11B -- Request for "Second-Adjacent" Waiver

The antenna site of the proposed Channel 292 LPFM station exceeds the 47 CFR §73.807(a) minimum distance separations from all FM facilities except second-adjacent stations WJZR, Channel 290A, Rochester, NY and WKGS, Channel 294A, Irondequoit, NY.

Under an exception provided in 47CFR §73.807(e)(1), "The Commission will entertain requests to waive the second-adjacent channel separations in paragraphs (a) through (c) of this section on a case-by-case basis. In each case, the LPFM station must establish, using methods of predicting interference taking into account all relevant factors, including terrain-sensitive propagation models, that its proposed operations will not result in interference to any authorized radio service. The LPFM station may do so by demonstrating that no actual interference will occur due to intervening terrain or lack of population. The LPFM station may use an undesired/desired signal strength ratio methodology to define areas of potential interference."

A "second-adjacent" waiver is respectfully requested in the instant LPFM application, based on this showing that any predicted interference to WJZR and WKGS would be confined to an unpopulated area.

The proposed LPFM antenna will be mounted atop an existing masonry building known as the "Main Street Armory" at 900 East Main Street, Rochester, NY. This building was originally constructed by the US Army to serve as an armory, but is now privately owned and operated primarily as rental office space and as a concert and sporting venue. As shown in Figure 1, the measured height of this building (without appurtenances) is 42 meters above ground level. Several low power land mobile and cellular communications antennas are presently mounted atop the masonry "tower", the highest at 51 meters above ground level. The proposed LPFM transmit antenna will consist of a single non-directional bay centered at 44 meters above ground level, 5 meters above the roof deck of the masonry tower.

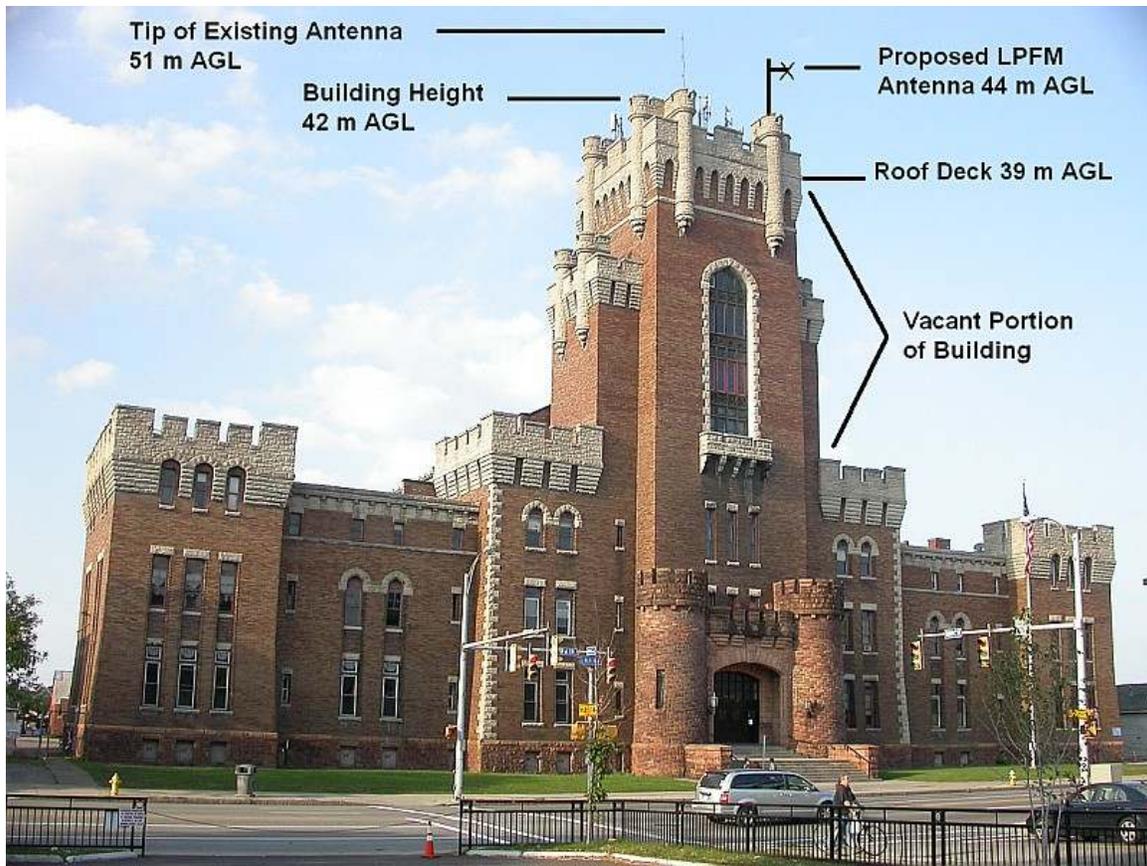


Figure 1 – Photograph of "Main Street Armory" Building
(Heights rounded to nearest meter)

Predicted field strength contours of WJZR and WKGS at the proposed LPFM antenna site are plotted in Figure 2. The WJZR contour level is 114 dBu based on the free-space equation, and for WKGS, the applicable contour is 100 dBu calculated with the standard F(50,50) algorithm. Based on the accepted undesired-to-desired signal ratio of 40 dB that defines second-adjacent interference, no interference to WJZR or WKGS would be expected beyond the 140 dBu free-space contour of the proposed LPFM station. At 25 watts ERP, the radius of this contour is 4 meters in the horizontal plane, which would not reach any structures other than the Main Street Armory itself. Assuming a "worst-case" scenario of full downward radiation from the proposed transmit antenna, the 140 dBu contour would clear the roof deck of the masonry tower by 1 meter, and would clear the ground by at least 40 meters. As noted in Figure 1, the upper space within the tower (which is below the 140 dBu contour) is used solely for a stairwell, mechanical rooms, and radio equipment, and as such, can be considered an unpopulated area.

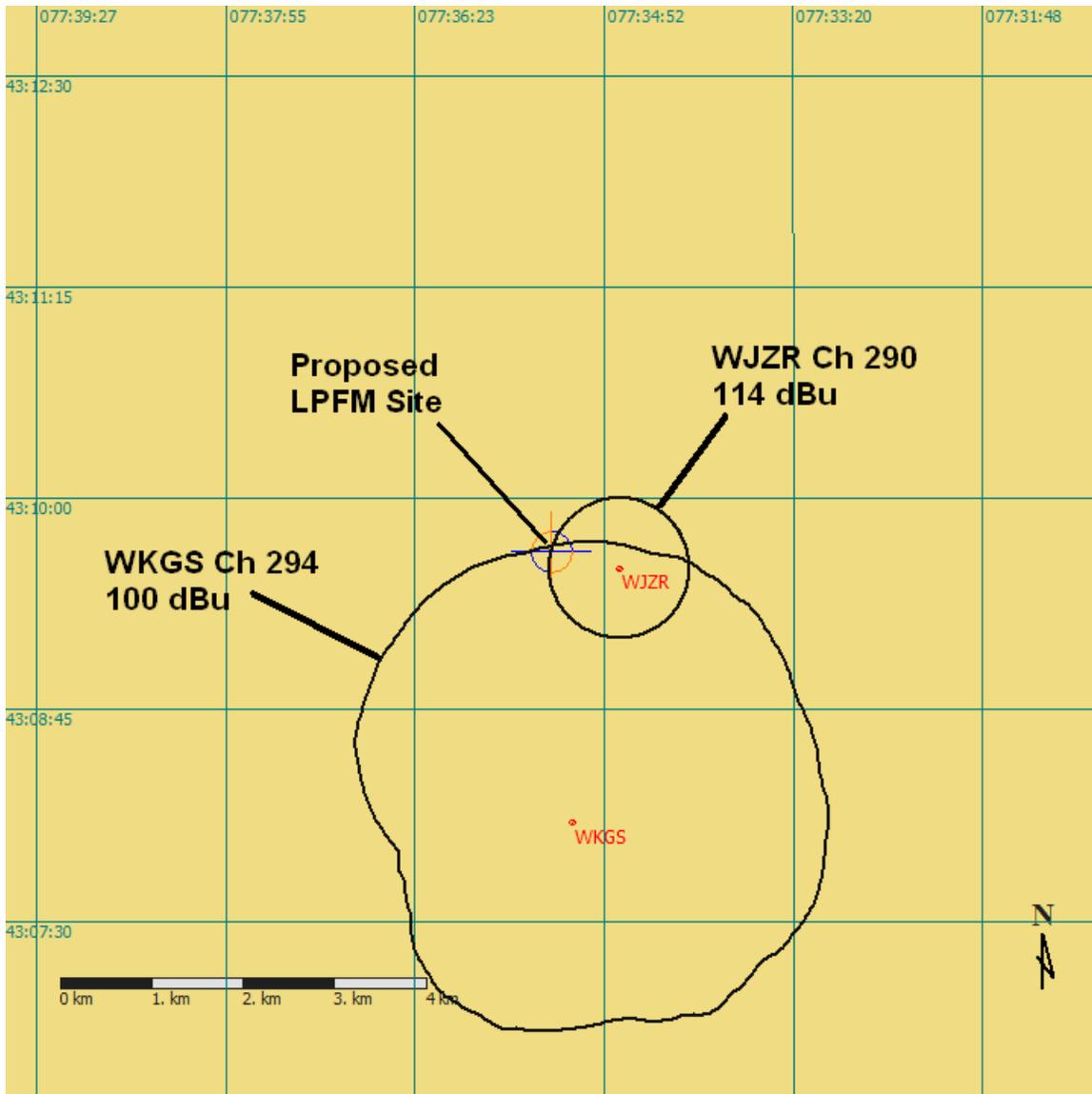


Figure 2 – Predicted Field Strength Contours of WJZR and WKGS

Based on this showing, Rochester Free Radio, Inc. believes the proposed LPFM station would not cause second-adjacent interference to WJZR or WKGS. The Rochester, NY market has been designated "LPFM spectrum limited" due to a shortage of fully-spaced channel points; therefore, a grant of the requested waiver would serve the public interest.