

Exhibit B-16
WPAY Channel 281C Portsmouth, Ohio
Allocation Study

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C stations as prescribed in §73.207 of the Commission's Rules, with the exception of short-spacings to four stations: WXEG 280A Beavercreek, WEGE 280A Westerville, WLBC 281B Muncie, and WNLT 282A Harrison. Each of these short-spacings is discussed in detail below.

WXEG 280A Beavercreek

WPAY operates as a "pre 1964" grandfathered short-spaced station with respect to WXEG, under §73.213(a) of the Commission's Rules. The attached allocation study map demonstrates that there will be no contour overlap (and thus by definition no interference area) between the proposed WPAY facility and the licensed WXEG facility, satisfying the requirements of §73.213(a).

WLBC 281B Muncie

WPAY operates as a "pre 1964" grandfathered short-spaced station with respect to WLBC, under §73.213(a) of the Commission's Rules. The attached allocation study map and detail map demonstrate that the facility proposed herein will reduce the area of existing overlap caused to WLBC by WPAY such that the proposed interference area will be completely contained within the existing interference area. (It should be noted that in this particular case, the ratio method interference areas would be so small as to be

indistinguishable from the contour overlap areas.) There will be no interference caused to WPAY by WLBC. Therefore, this proposal satisfies the requirements of §73.213(a) with respect to WLBC.

WEGE 280A Westerville

The licensed WPAY operation is 5.33 km short-spaced to the licensed operation of WEGE. However, it was WEGE which created this short-spacing, in a series of modification applications with file numbers BPH-19971205JB, BMPH-19980605IC, and BMPH-19980820IB (now licensed as BLH-19980825KC). In its application(s), WEGE was required to demonstrate contour protection to WPAY, presuming WPAY operation with full Class C facilities of 100 kW ERP at 600 meters HAAT.

The proposed WPAY operation, in part representing a one-second coordinate correction, is 5.36 km short-spaced to the licensed operation of WEGE. Since both the licensed short-spacing and the proposed short-spacing round to 5 kilometers, and since the licensed WEGE facility will continue to provide contour protection to the new WPAY facility presuming WPAY operation with full Class C facilities (as demonstrated by the allocation study map and detail map), there is no material change in this existing short-spacing and it is not believed necessary for WPAY to request processing pursuant to §73.215 with respect to the WEGE license.

The proposed WPAY operation is also short-spaced to WEGE construction permit BPH-20011221AAQ (grant rescinded and application dismissed by the Commission on

1/2/2004, but with a Petition for Reconsideration pending) and to pending WEGE application BPH-20040108ALM. Both of these WEGE facilities fail to meet the Section 73.207 spacing requirements to the licensed WPAY facility, and both fail to protect the licensed WPAY facility in accordance with the requirements of Section 73.215 (including assumption of WPAY operation with maximum Class C parameters of 100 kW at 600 meters HAAT, since the licensed WPAY facility was not authorized pursuant to Section 73.215). Since the WEGE construction permit and application are in violation of Section 73.215 with respect to the licensed WPAY facility and to the proposed WPAY facility, and since the instant application proposes no change in the WPAY transmitter site apart from a one-second-of-latitude coordinate correction, the WEGE construction permit and application are not believed to be any impediment to the grant of the instant application. (Please see the associated legal pleading for further discussion.)

WNL 282A Harrison

The licensed WPAY operation is 6.20 km short-spaced to the licensed operation of WNL. However, it was WNL which created this short-spacing, in its application BPH-19980318IC (now licensed as BLH-20000410ABC). In its application, WNL was required to demonstrate contour protection to WPAY, presuming WPAY operation with full Class C facilities of 100 kW ERP at 600 meters HAAT.

In the course of preparation of the instant WPAY application, this firm has been unable to duplicate WNL's prior demonstration of a lack of prohibited contour overlap. Whether

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using the 3-second terrain database or the 30-second terrain database, with contour distances calculated at 1 degree intervals, there remains a small amount of contour overlap (nearly tangential) received by WNLT from the licensed WPAY facility (assumed with 100 kW ERP at 600 meters HAAT). This relationship is depicted on the attached detail map.

The proposed WPAY operation, in part representing a one-second coordinate correction, is 6.21 km short-spaced to the licensed operation of WNLT. Both the licensed short-spacing and the proposed short-spacing round to 6 kilometers, and the licensed WNLT facility will continue to provide contour protection to the new WPAY facility presuming WPAY operation with full Class C facilities (as demonstrated by the attached allocation study map and detail map). More specifically, the instant WPAY application will reduce the amount of overlap already received by WNLT and resulting from WNLT's own application. Therefore, there is no material change in this existing short-spacing and it is not believed necessary for WPAY to request processing pursuant to §73.215 with respect to WNLT.

SEARCH PARAMETERS FM Database Date: 041110

Channel: 281C 104.1 MHz Page 1
 Latitude: 38 43 21
 Longitude: 83 0 5
 Safety Zone: 32 km
 Job Title: WPAY 281C PORTSMOUTH

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	CATLETTSBURG KY	BNPFT-030314BWV	227D 93.3	0.250 DA 173.0	38-24-44 082-36-12	134.8	48.89 0.00	0 TRANS
WCBJ LIC	CAMPTON KY	BLH-990621KE	279A 103.7	4.100 121.0	37-39-03 083-26-21	197.9	124.98 29.98	95 CLEAR
NEW-T APP	ATHENS OH	BNPFT-030317FKH	279D 103.7	0.010 266.0	39-18-52 082-08-60	47.9	98.77 0.00	0 TRANS
NEW-T APP	MIDDLEPORT OH	BNPFT-030310AJQ	279D 103.7	0.013 149.0	39-03-30 082-02-31	65.5	91.21 0.00	0 TRANS
W279AV CP	PORTSMOUTH OH	BNPFT-030822AJH	279D 103.7	0.019 114.0	38-45-03 083-01-50	321.2	4.04 0.00	0 TRANS
NEW CP	WASHINGTON COURT OH	BNPL-010122AFB	279L1 103.7	0.100 17.6	39-32-34 083-25-06	338.6	97.94 4.94	93 CLOSE
W280DO CP	LEXINGTON KY	BNPFT-030829BDK	280D 103.9	0.250 144.0	38-00-54 084-26-18	238.3	148.11 0.00	0 TRANS
WXXQ-FM LIC	WHITESBURG KY	BLH-031112ADL	280A 103.9	0.145 457.0	37-06-38 082-44-15	172.6 SS	180.41 15.41	165 CLEAR
WXEG LIC	BEAVERCREEK OH	BLH-020823AAY	280A 103.9	2.900 DA 146.0	39-43-19 084-12-36	317.2 SS	152.33 -12.67	165 SHORT
NOTE: 73.213(A) WITH RESPECT TO WPAY								
WXEGaux CP	BEAVERCREEK OH	BXPH-031216ADM	280A 103.9	1.500 133.0	39-43-36 084-12-23	317.5	152.50 0.00	0 AUX
W280CY LIC	MALTA OH	BLFT-980309TE	280D 103.9	0.007 71.0	39-38-36 081-51-29	43.5	142.16 0.00	0 TRANS
WEGE LIC	WESTERVILLE OH	BLH-980825KC	280A 103.9	5.100 DA 106.0	40-09-33 082-55-23	2.4 SS	159.64 -5.36	165 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 142 KM								
NOTE: 73.215 WITH RESPECT TO WPAY								
WEGE CP	WESTERVILLE OH	BPH-011221AAQ	280A 103.9	5.300 DA 106.0	40-09-33 082-55-23	2.4	159.64 -5.36	165 SHORT
NOTE: GRANT RESCINDED AND APPLICATION DISMISSED; SEE TEXT								
WEGE APP	WESTERVILLE OH	BPH-040108ALM	280A 103.9	6.000 100.0	40-05-24 082-56-52	1.7	151.89 -13.11	165 SHORT
NOTE: VIOLATES 73.215 WITH RESPECT TO WPAY LICENSE; SEE TEXT								

SEARCH PARAMETERS FM Database Date: 041110

Channel: 281C 104.1 MHz Page 2
 Latitude: 38 43 21
 Longitude: 83 0 5
 Safety Zone: 32 km
 Job Title: WPAY 281C PORTSMOUTH

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	PARKERSBURG WV	BNPFT-030826AAE	280D 103.9	0.010 194.0	39-18-36 081-35-48	61.3	138.04 0.00	0 TRANS
WLBCaux LIC	MUNCIE IN	BLH-820318AC	281B 104.1	9.300 72.0	40-09-42 085-22-41	308.9	259.60 0.00	0 AUX
WLBC-FM LIC	MUNCIE IN	BLH-990615KB	281B 104.1	41.000 140.0	40-09-40 085-22-44	308.8	259.62 -14.38	274 SHORT
NOTE: 73.213(A) WITH RESPECT TO WPAY								
WCKQ LIC	CAMPBELLSVILLE KY	BLH-950404KA	281C3 104.1	17.000 120.0	37-20-07 085-22-33	234.2 SS	259.17 22.17	237 CLEAR
NEW-T APP	ELKHORN CITY KY	BNPFT-030313APY	281D 104.1	0.010 215.0	37-27-57 082-33-04	164.1	144.97 0.00	0 TRANS
NEW-T APP	PIKEVILLE KY	BNPFT-030314AJL	281D 104.1	0.250 287.0	37-27-57 082-33-04	164.1	144.97 0.00	0 TRANS
NEW-T APP	PIKEVILLE KY	BNPFT-030314AKH	281D 104.1	0.010 241.0	37-29-31 082-31-12	162.7	142.96 0.00	0 TRANS
WPAY-FM LIC	PORTSMOUTH OH	BLH-890612KC	281C 104.1	100.000 305.0	38-43-20 083-00-05	218.0	0.04 -289.96	290 SHORT
WPAY-FM CP	PORTSMOUTH OH	BPH-021023ABC	281C 104.1	100.000 451.0	38-25-08 083-07-53	198.5 SS	35.56 -254.44	290 SHORT
WJFZ-LP CP	ZANESVILLE OH	BNPL-010119ACF	281L1 104.1	0.100 6.5	39-57-08 082-05-25	29.5	157.51 27.51	130 CLEAR
WDCI LIC	BRIDGEPORT WV	BLH-971027KF	281A 104.1	2.450 158.0	39-17-59 080-17-30	73.8	243.29 17.29	226 CLEAR
W281AJ CP	RIPLEY WV	BNPFT-030814AAD	281D 104.1	0.013 130.0	38-46-04 081-41-09	87.1	114.48 0.00	0 TRANS
NEW-T APP	MORRILL KY	BNPFT-030317MOI	282D 104.3	0.010 232.0	37-30-10 084-13-09	218.5	172.44 0.00	0 TRANS
NEW-T APP	DAYTON OH	BNPFT-030317AJQ	282D 104.3	0.080 58.0	39-45-28 084-11-36	318.7	154.27 0.00	0 TRANS

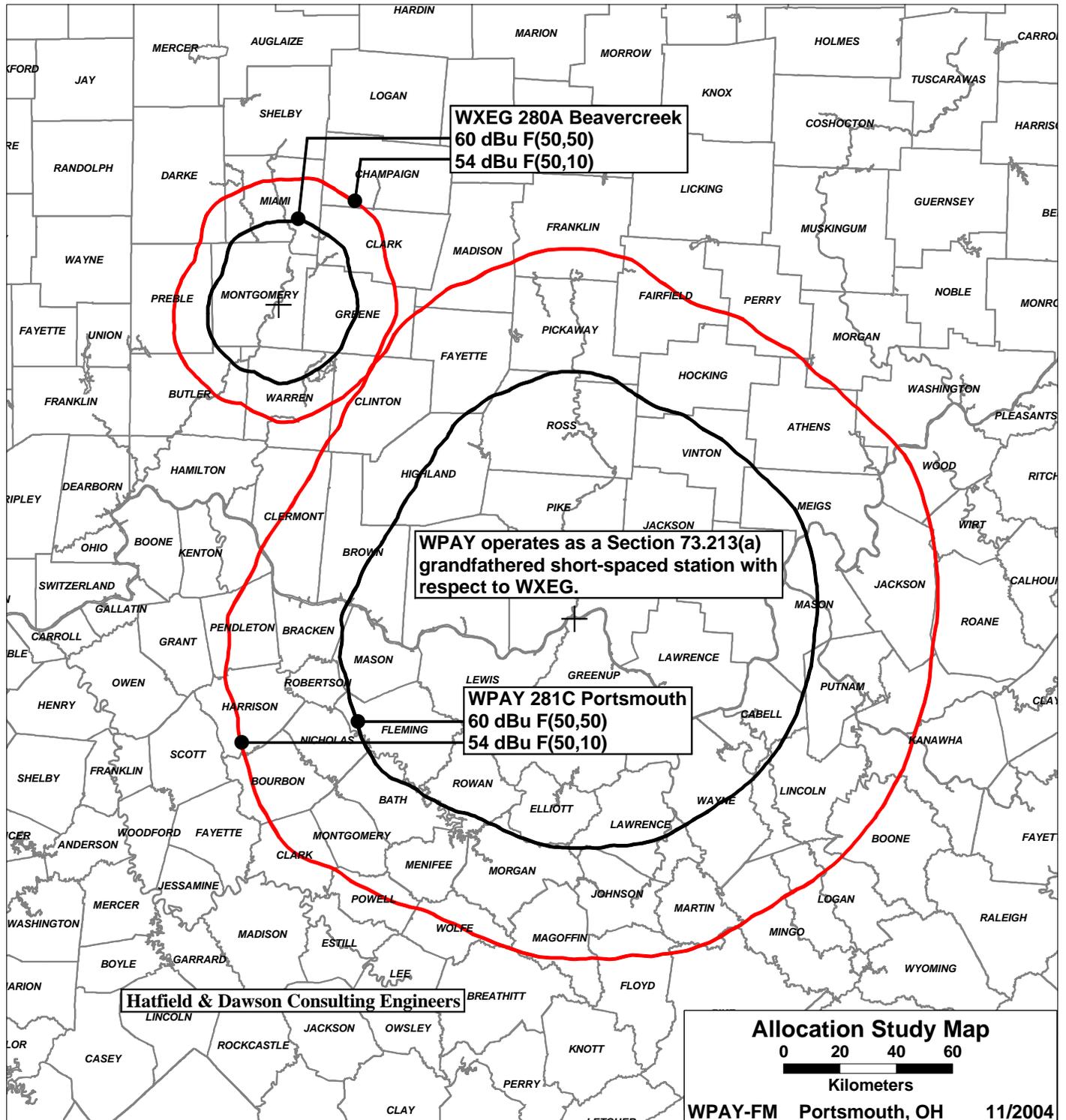
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SEARCH PARAMETERS FM Database Date: 041110 Page 3

Channel: 281C 104.1 MHz
 Latitude: 38 43 21
 Longitude: 83 0 5
 Safety Zone: 32 km
 Job Title: WPAY 281C PORTSMOUTH

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
WNLTAUX APP	HAMILTON OH	BXPH-040809AAM	282A 104.3	6.000 88.0	39-13-34 084-42-59	291.2	158.79 0.00	0 AUX
WNLTAUX LIC	HARRISON OH	BLH-000410ABC	282A 104.3	5.200 100.0	39-13-34 084-42-59	291.2 SS	158.79 -6.21	165 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 142 KM NOTE: 73.215 WITH RESPECT TO WPAY								
WNLTAUX APP	HARRISON OH	BXPH-040809AAM	282A 104.3	6.000 88.0	39-13-34 084-42-59	291.2	158.79 0.00	0 AUX
WJFY-LP CP	NEWARK OH	BNPL-010122AJV	282L1 104.3	0.100 29.5	39-58-18 082-24-45	19.8	147.68 27.68	120 CLEAR
WJZK LIC	RICHWOOD OH	BLH-960206KC	282A 104.3	3.400 133.0	40-18-22 083-19-45	351.0	178.06 13.06	165 CLEAR
NEW-T APP	XENIA OH	BNPFT-030317MTZ	282D 104.3	0.080 87.0	39-41-19 083-59-10	322.0	136.89 0.00	0 TRANS
W282AI LIC	PARKERSBURG WV	BLFT-010628ABX	282D 104.3	0.100 44.0	39-15-51 081-35-33	63.2	136.07 0.00	0 TRANS
NEW-T APP	ST. MARYS WV	BNPFT-030317HOA	282D 104.3	0.010 210.0	39-22-51 081-11-02	64.4	173.48 0.00	0 TRANS
WLKT LIC	LEXINGTON-FAYETTE KY	BLH-000217ABS	283C2 104.5	50.000 142.0	38-04-09 084-18-44	238.0 SS	135.55 30.55	105 CLEAR
W283AP CP	PRESTONSBURG KY	BNPFT-030827AGP	283D 104.5	0.250 256.0	37-39-57 082-48-12	171.6	118.56 0.00	0 TRANS
WYWH-LP CP	ATHENS OH	BNPL-010122ADF	283L1 104.5	0.100 -31.0	39-19-59 082-05-20	49.0	104.11 11.11	93 CLEAR
W283AQ CP	CROSS LANES WV	BNPFT-030826AHS	283D 104.5	0.210 DA 159.0	38-23-57 081-46-42	108.3	112.48 0.00	0 TRANS
W284BD CP	LOGAN OH	BNPFT-030828ACK	284D 104.7	0.013 129.0	39-31-27 082-26-26	28.3	101.35 0.00	0 TRANS
W284BL CP	HUNTINGTON WV	BNPFT-030827AMV	284D 104.7	0.004 216.0	38-23-31 082-29-29	129.5	57.64 0.00	0 TRANS

44444 END OF FM SPACING STUDY FOR CHANNEL 281 44444



WPAY operates as a Section 73.213(a) grandfathered short-spaced station with respect to WLBC.

WLBC 281B Muncie
54 dBu F(50,50)
40 dBu F(50,10)

INDIANA

OHIO

WEST VIRGINIA

KENTUCKY

WPAY 281C Portsmouth
Prop 60 dBu F(50,50)
Prop 34 dBu F(50,10)
Licensed 34 dBu F(50,10)

VIRGINIA

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TENNESSEE

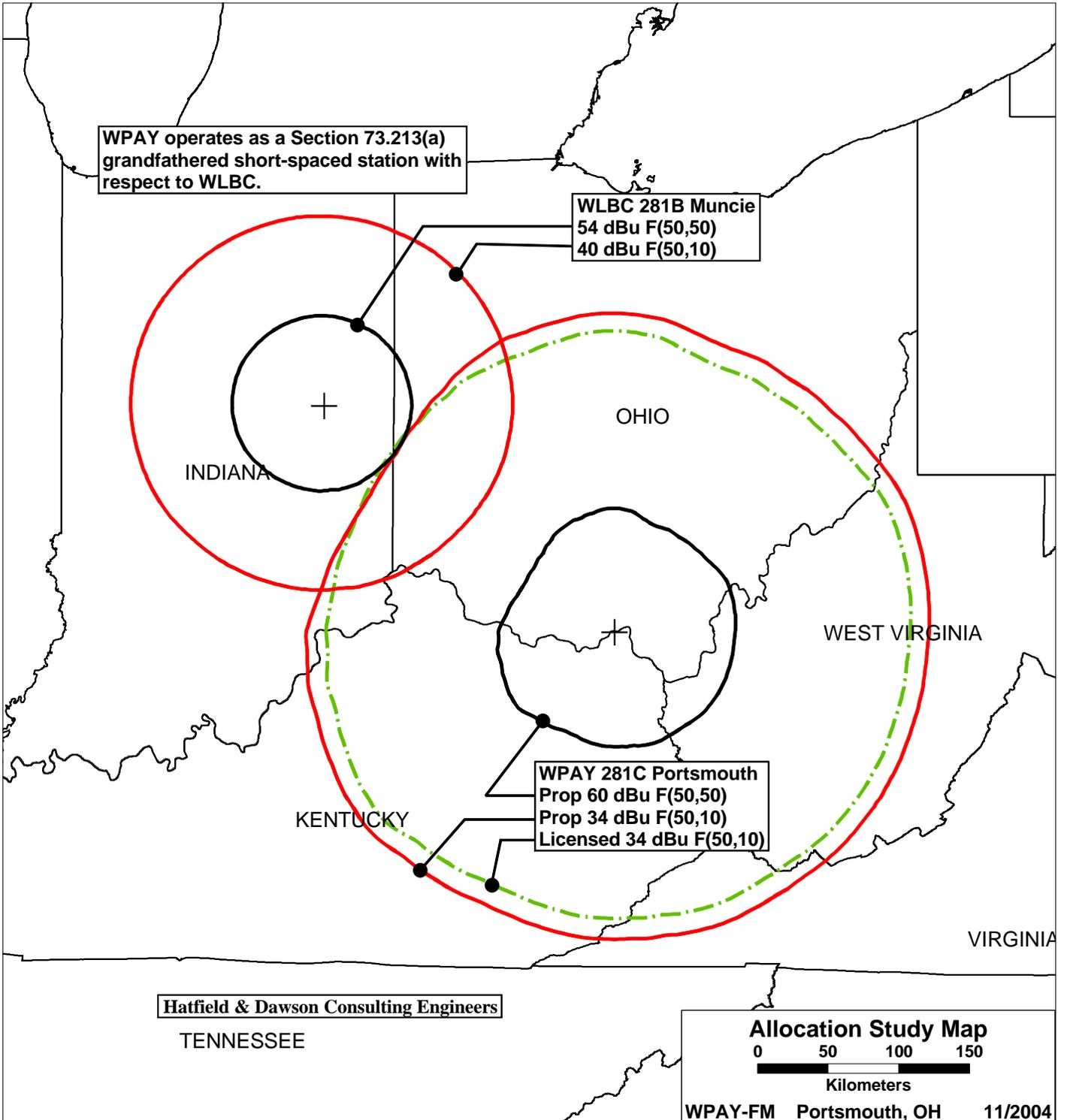
Allocation Study Map

0 50 100 150



Kilometers

WPAY-FM Portsmouth, OH 11/2004



WPAY operates as a Section 73.213(a) grandfathered short-spaced station with respect to WLBC.

WLBC 281B Muncie
54 dBu F(50,50)

WPAY 281C Portsmouth
Prop 34 dBu F(50,10)
Licensed 34 dBu F(50,10)

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Allocation Study Map Detail

0 10 20 30



Kilometers

WPAY-FM Portsmouth, OH 11/2004

Both WEGE and WNLT operate as Section 73.215 stations with respect to WPAY.

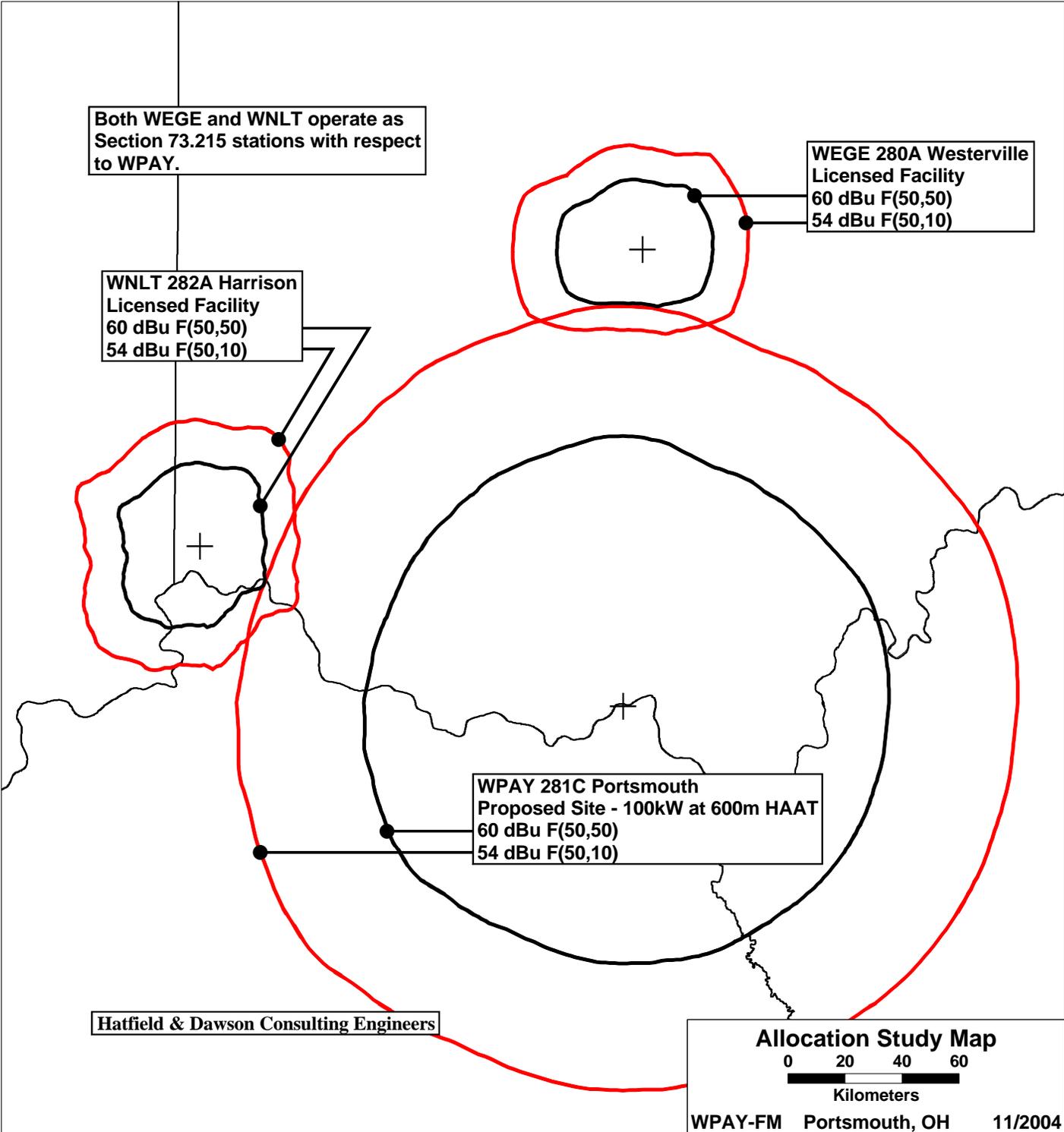
WNLT 282A Harrison
Licensed Facility
60 dBu F(50,50)
54 dBu F(50,10)

WEGE 280A Westerville
Licensed Facility
60 dBu F(50,50)
54 dBu F(50,10)

WPAY 281C Portsmouth
Proposed Site - 100kW at 600m HAAT
60 dBu F(50,50)
54 dBu F(50,10)

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Allocation Study Map
0 20 40 60
Kilometers
WPAY-FM Portsmouth, OH 11/2004



WEGE operates as a Section 73.215 station with respect to WPAY.

**WEGE 280A Westerville
Licensed Facility
60 dBu F(50,50)
54 dBu F(50,10)**

**WPAY 281C Portsmouth
Proposed Site - 100kW at 600m HAAT
60 dBu F(50,50)
54 dBu F(50,10)**

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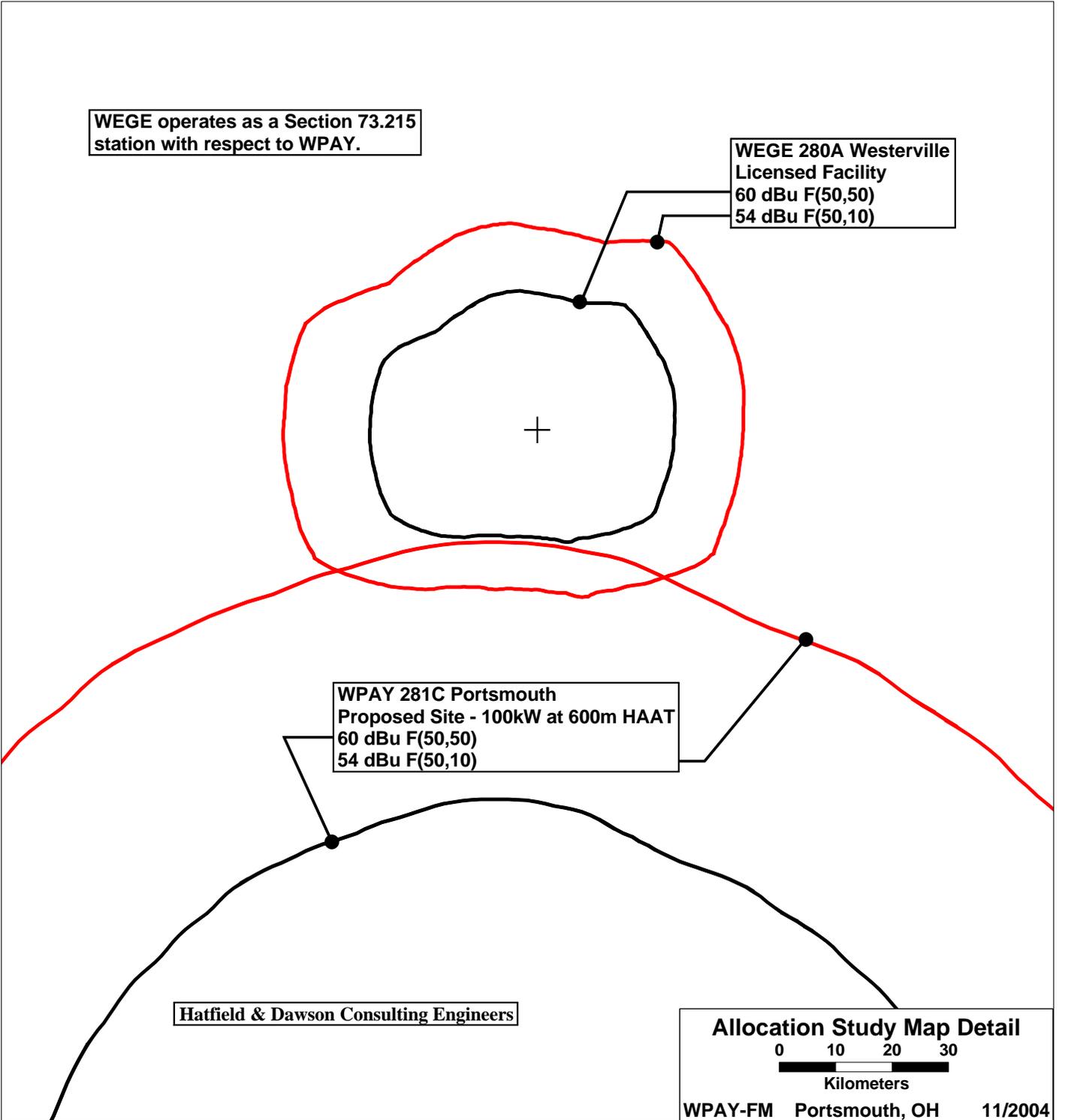
Allocation Study Map Detail

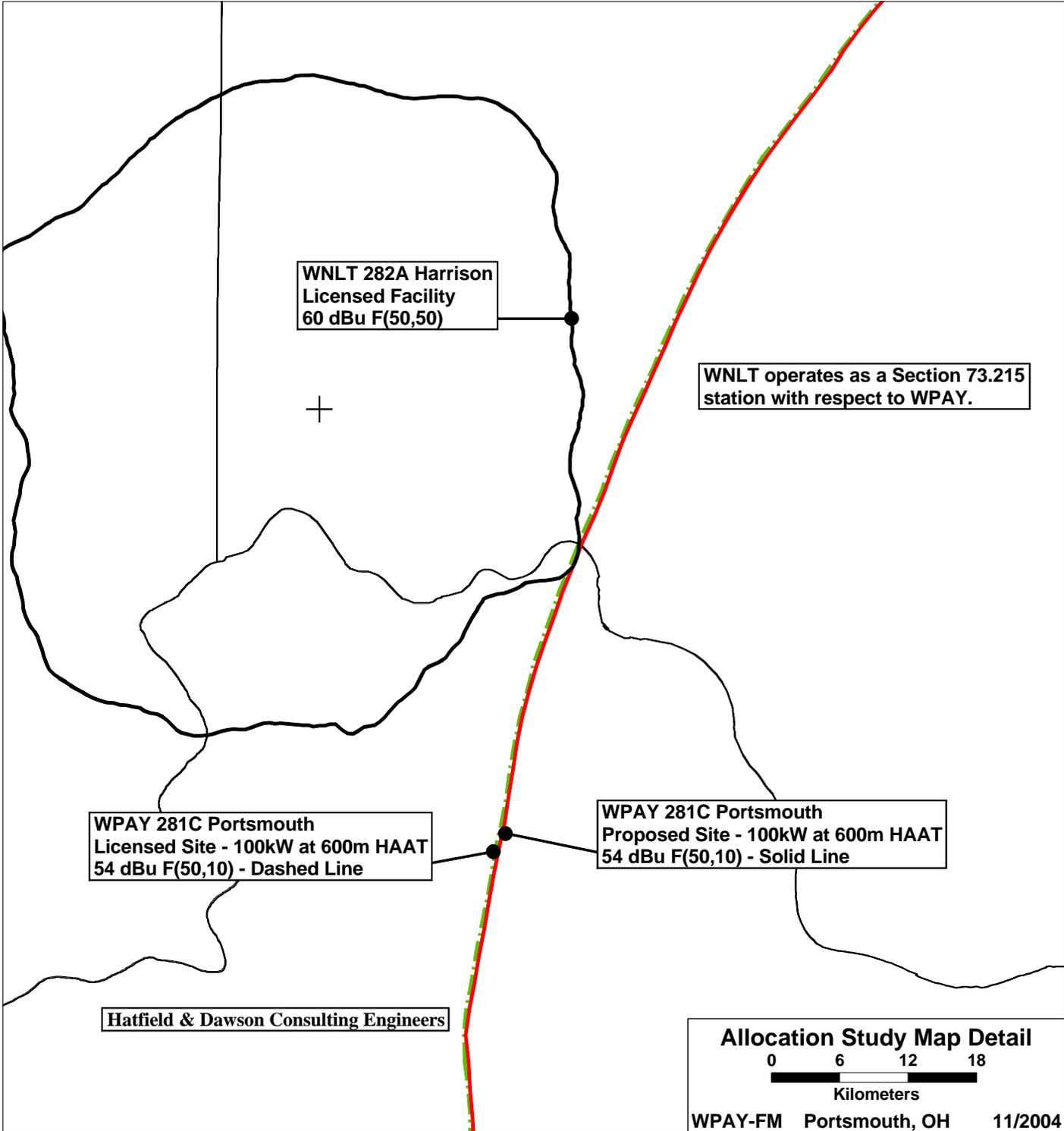
0 10 20 30



Kilometers

WPAY-FM Portsmouth, OH 11/2004





WNL 282A Harrison
Licensed Facility
60 dBu F(50,50)

WNL operates as a Section 73.215
station with respect to WPAV.

WPAY 281C Portsmouth
Licensed Site - 100kW at 600m HAAT
54 dBu F(50,10) - Dashed Line

WPAY 281C Portsmouth
Proposed Site - 100kW at 600m HAAT
54 dBu F(50,10) - Solid Line

Hatfield & Dawson Consulting Engineers

Allocation Study Map Detail
0 6 12 18
Kilometers
WPAV-FM Portsmouth, OH 11/2004