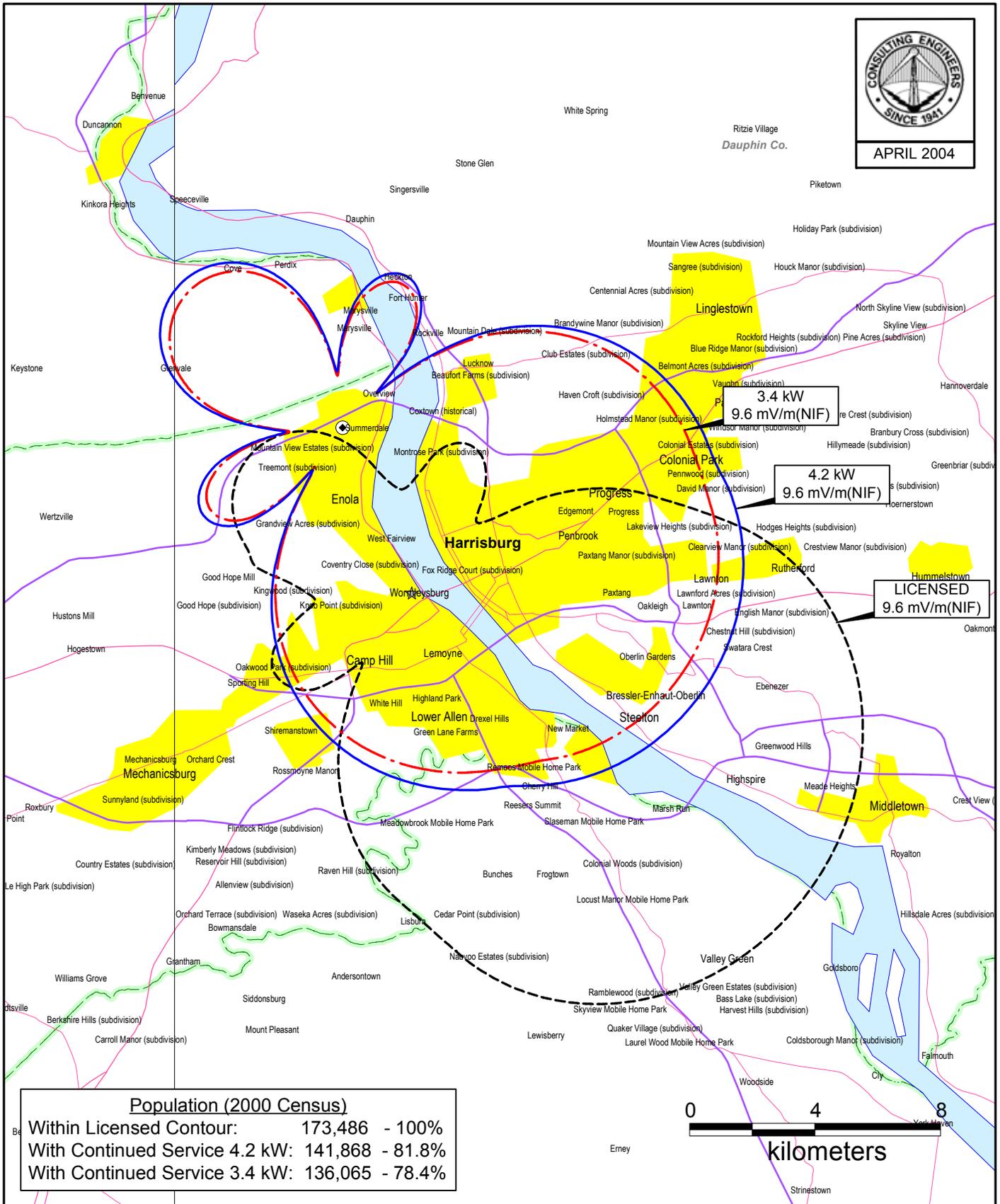


WTKT(AM), Harrisburg, PA, File No. BP-20040109ACP

Grounds for Waiver of Section 73.182(q)

- WTKT was evicted from its licensed site due to circumstances beyond its control.
- The site designated in the application is the result of extensive efforts by the licensee to locate a site that would provide interference-free service to the city of license using a nighttime directional antenna, while still reducing interference. The licensee could not obtain a local building permit for a previously designated site, and had to locate another site. The licensee has obtained local zoning approval for the application site.
- The application proposes a reduction in nighttime power from 5 kW to 4.2 kW.
- The licensee designed the array to reduce interference wherever possible.
- The licensee was constrained by the available property at the application site to design the directional array, thereby limiting the options available to further reduce interference. For example, no more than three towers will fit onto the site.
- As shown in the first chart on page 7 of the Engineering Statement, although not at 10 percent, there is a reduction in interference to each of the six stations entering into the 50 percent RSS contribution.
- As shown in the second chart on page 7 of the Engineering Statement, there are large reductions in interference to the three stations entering into the 25 percent RSS contribution, providing a countervailing public service benefit.
- Because six stations - in different directions – receive 50 percent nighttime RSS contributions from WTKT, a directional array could not be designed to reduce interference to each such station by 10 percent without substantially reducing coverage to areas that would receive service under the licensed pattern.
- The attached figure demonstrates that at the proposed 4.2 kW, 81.8 percent of the population that received coverage under the licensed facilities would continue to receive nighttime coverage. However, if power was further reduced from 4.2 kW to 3.4 kW, then there would be a further loss of service so that only 78.4 percent of the population that would be served by the licensed facility would be served at night. If WTKT had not been evicted from its licensed site, this population would not be deprived of nighttime coverage.

Figure 1



PREDICTED NIGHTTIME COVERAGE CONTOUR COMPARISON

RADIO STATION WTKT
 HARRISBURG, PENNSYLVANIA
 1460 KHZ 5 KW U DA-2

du Treil, Lundin & Rackley, Inc. Sarasota, Florida