

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 54 dBu contour of the second-adjacent WGGY, Scranton, PA and the predicted interference to the 60 dBu contour of the third-adjacent WHBS, Pittston, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WGGY, Scranton, PA and WHBS, Pittston, PA, second and third adjacent channel facilities to this translator proposal, are protected from interference within their 54 dBu and 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contours (WGGY & WHBS) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.

2. This translator's antenna location is located within the 54 dBu contour (based on 73.333 F(50/50)) of WGGY, Scranton, PA and within the 60 dBu contour (based on 73.333 F(50/50)) of WHBS, Pittston, PA. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to WGGY & WHBS. Included as an attachment (W269CF 101.7 Clarks Summit, PA b Desired to Undesired Ratios Map) is a map showing that the 90 dBu coverage contour of WGGY & the 70 dBu coverage contour of WHBS encompasses the proposed antenna site along with the entire proposed 130 dBu and 110 dBu interference contours. As the proposed 130 dBu interference contours are 40 dBu greater than the 90 dBu contour of WGGY and the proposed 110 dBu interference contours are 40 dBu greater than

the 70 dBu contour of WHBS then these contours are the appropriate interference contours for this analysis and it is clearly evident that interference will only occur within these interference contours for this proposed translator. It should be noted that a showing of no population within the 110 dBu contours also proves no population within the 130 dBu contours which is even smaller than the 110 dBu contours. Only the 110 dBu showing will be made.

3. Given this translator's requested effective radiated power of 24 watts Vertical and 6 watts Horizontal, Directional; the predicted 110 dBu interference contours for this proposal would be very small. At any HAAT value, the maximum 110 dBu contour (the vertical 110 dBu contour) distance for this proposal is 0.11 kilometers towards 315 degrees true north and less than this in all other directions. Because of the very small distances and to make this study simple, a uniform non-directional 79 watts (more than 3 times greater than 24 watt max) will be drawn overstating the 110 dBu contour.

4. This proposed translator site is situated in a very sparsely populated area. W269CF 101.7 Clarks Summit, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 110 dBu interference contour of this proposal with no dwellings at all located within this contour. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to WGGY, Scranton, PA and WHBS, Pittston, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, WGGY, Scranton, PA and WHBS, Pittston, PA.

By: Kevin Fitzgerald, Chief Engineer