

Section 1204(d) Study

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contours of the second-adjacent WDMT, Pittston, PA and the second-adjacent Proposed WAMT, Avoca, PA is allowable under the rules stated in 47 CFR 74.1204(d). In support thereof Applicant states the following:

1. WDMT, Pittston, PA and Proposed WAMT, Avoca, PA, second adjacent channel facilities to this translator proposal, are protected from interference within their 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 (WDMT & WAMT) 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 60 dBu contours (based on 73.333 F(50/50)) of WDMT, Pittston, PA and Proposed WAMT, Avoca, 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 WDMT & WAMT. Included as an attachment (WEZX 102.7 Clarks Summit, PA Desired to Undesired Ratios Map) is a map showing that the 69 dBu coverage contours of WDMT & WAMT encompasses the proposed antenna site along with the entire proposed 109 dBu interference contour. As the proposed 109 dBu interference contour is 40 dBu greater than the 69 dBu contours of WDMT & WAMT then this contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 109 dBu interference contour of this proposed translator.

3. Given this translator's requested effective radiated power of 72 watts, directional; the predicted 109 dBu interference contour for this proposal would be exceedingly small. At any HAAT value, the maximum 109 dBu contour distance for this proposal is 0.21 kilometers at 10 degrees from true north and smaller than this in all other directions.

4. This proposed translator site is situated in a very sparsely populated rural hilltop tower farm area. WEZX 102.7 Clarks Summit, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 109 dBu interference contour of this proposal with no dwellings at all located within this contour (this contour factors in the correct directional antenna power gain in each direction for this proposal). 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 Applicant submits that the predicted interference to WDMT, Pittston, PA and proposed WAMT, Avoca, PA is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of the instant 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, WDMT, Pittston, PA and Proposed WAMT, Avoca, PA.

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