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## **Geographic Restriction Waiver Based on Terrain Shielding**

The Auction 81 announcement "SCHEDULING OF LIMITED LOW POWER TELEVISION/TELEVISION TRANSLATOR/CLASS A TELEVISION AUCTION FILING WINDOW FROM JULY 31 THROUGH AUGUST 4, 2000" stated:

"This auction filing window is subject to geographic restrictions on the filing of applications for new station construction permits and for major changes in existing facilities."

"Notwithstanding the above, the Commission will consider requests for waiver of the geographic restrictions based on terrain shielding." "Requests for terrain-related waivers, which will be filed subsequently at the direction of the Commission, must be supported by an appropriate number of profiles showing the terrain between the proposed community of service and the applicable TV market cities, indicating that the signals of full-service stations in these cities cannot be directly received in the proposed community."

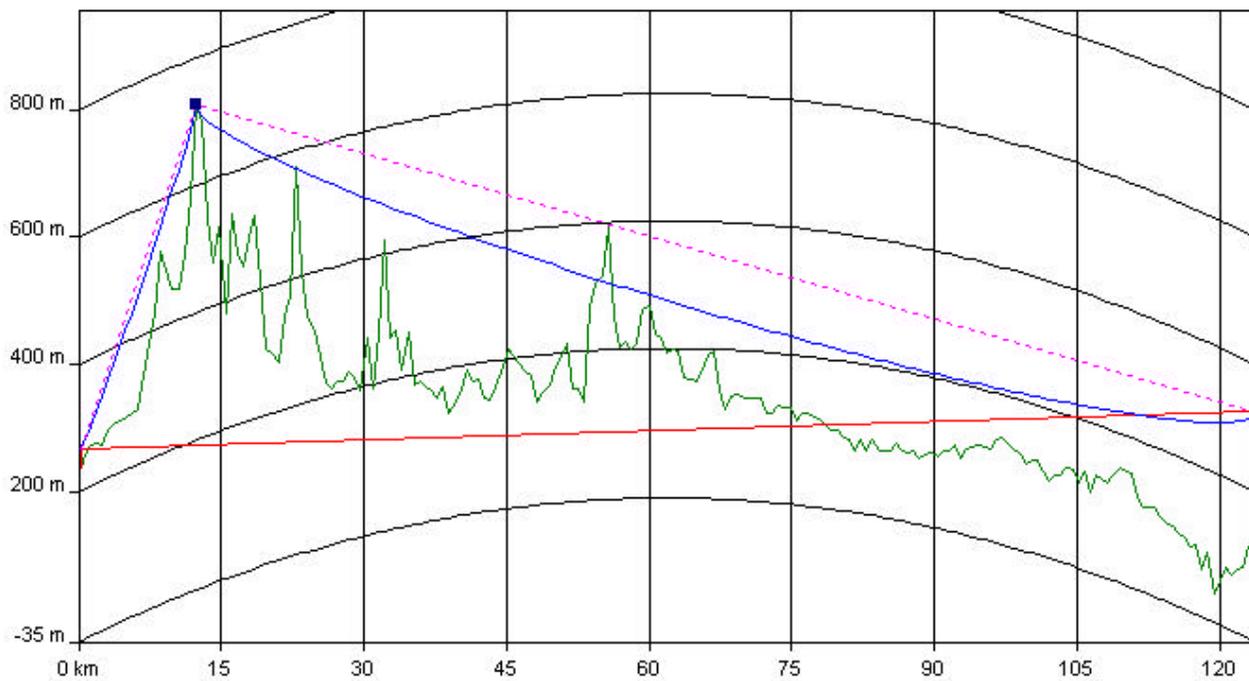
Due to terrain shielding, we are requesting waiver of the geographic restriction to the Washington DC market. The tallest antenna in the market is a community DTV antenna carrying WETA-DT, WUSA-DT, WDCA-DT and WJLA-DT. The antenna has a center of radiation 327m above mean sea level.

Attached is a profile from the proposed community of service, Luray, VA to the above stated antenna. Since Luray is such a small town, it is deemed only one profile is necessary. As can be seen, there is clearly terrain blockage between Luray and the Washington DC community antenna, therefore, none of the Washington DC stations can be directly received in Luray, and the proposed application is grantable.

Sincerely

Richard C Goetz  
President  
R & L Media Systems

## ComStudy 2 Path Profile



### Luray, VA

Lat: 38-39-56.0 N  
Lon: 78-27-37.0 W  
AMSL: 238 m  
Tower AGL: 30 m

### WUSA-DT

Lat: 38-57-01.2 N  
Lon: 77-04-47.2 W  
AMSL: 115 m  
Tower AGL: 212 m

### Profile Info

Distance: 123.72 Km  
Bearing: 74.74 deg  
# of points: 200  
K value: 1.333  
Frequency: 336.75  
Clearance: 0.6

### Losses

Base Loss: 126.3 dB  
Fade Margin: -5.3 dB  
Diffraction: 50.4 dB  
Fresnel: 5.6 dB