

SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour's of the second-adjacent WGRC, Lewisburg, PA and WVBU-FM, Lewisburg, PA is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. WGRC, Lewisburg, PA and WVBU-FM, Lewisburg, 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 (WGRC and WVBU-FM) 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 WGRC, Lewisburg, PA and WVBU-FM, Lewisburg, 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 WGRC and WVBU-FM. Included as an attachment (W215BU 90.9 Lewisburg, PA Desired to Undesired Ratios Map) is a map showing that the 89 dBu coverage contour of WGRC and the 72.5 dBu coverage contour of WVBU-FM both encompass the proposed antenna site along with the entire proposed 112.5 dBu interference contour. The proposed 112.5 dBu interference contour is 40 dBu greater than the 72.5 dBu contour of WVBU-FM (the related contour for WGRC at 89 dBu which is 40 dBu greater for the proposed would be the 129 dBu contour which is completely contained within the 112.5 dBu contour of the proposed; the showing of no population within the 112.5 dBu contour also proves no population within the 129 dBu contour which is exceedingly small). This

112.5 dBu contour is the appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this 112.5 dBu interference contour of this proposed translator.

3. Given this translator's requested effective radiated power of 250 watts, directional; the predicted 112.5 dBu interference contour for this proposal would be very small. At any HAAT value, the maximum 112.5 dBu contour distance for this proposal is 0.26 kilometers towards 235 degrees true and smaller in all other directions.

4. This proposed translator site is situated in a sparsely populated area. W215BU 90.9 Lewisburg, PA 74.1204(d) Geo Map, an attachment to this exhibit, clearly shows how rural the area is within the 112.5 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 WGRC, Lewisburg, PA and WVBU-FM, Lewisburg, 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, WGRC, Lewisburg, PA and WVBU-FM, Lewisburg, PA.

By: Kevin Fitzgerald, Technical Consultant