ORIGINAL FILE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of	)	MM Docket No. 91-10
	)	
WHITE BROADCASTING PARTNERSHIP	)	File No. BPH-891214MM
et al.	)	

RECEIVED

MAR 1 3 1991

Federal Communications Commission
Office of the Secretary

For Construction Permit for a New FM Station
Station on Channel 289A in Baldwin, Florida

To: Hon. Edward Luton, Administrative Law Judge

CONTINGENT MOTION FOR SUMMARY DECISION

Peaches Broadcasting, Ltd. ("Peaches"), by counsel and pursuant to §1.251 of the Commission's Rules, hereby respectfully moves for summary decision of the air hazard issue designated against itself, White Broadcasting Partnership, Douglas Johnson, and Northeast Florida Broadcasting Corp.[1/]

The air hazard issue in question (HDO, DA 91-122, released February 11, 1991, at ¶4) was added because the FAA found potential electromagnetic interference as to the applications of Peaches, White, Johnson and Northeast. See Affidavit of John P. Allen (appended hereto with attachments) at 5.

1/ While it might appear unusual for an applicant to seek summary decision on issues facing certain of its adversaries, it appears that the factual predicates relating to Peaches are identical to those facing White, Johnson and Northeast. Therefore, it would be unjust and illogical if the issue designated against Peaches, White, Johnson and Northeast were resolved in Peaches' favor but not in the other applicants' favor.

As a predicate to this Motion, Peaches is manifesting its consent to an EMI condition such as that suggested herein. See p. 2 infra. Peaches requests that the instant Motion not apply to any applicant which indicates that it will not consent to an EMI condition.

Only one applicant, JEM Productions Limited Partnership ("JEM") drew no EMI condition. However, as shown in Mr. Allen's Affidavit, the only reason JEM drew no such condition is that JEM did not notify the FAA of its proposal. Mr. Allen's Affidavit (at 5) concludes that "all the applicants in the Baldwin proceeding will have to negotiate a solution with FAA, regarding the potential electromagnetic interference to the existing navigational facilities within the Jacksonville, Florida area."[2/]

Peaches recognizes that EMI issues may be resolved through negotiation with the FAA at the time a permit is granted. To accomplish this, a permit may be conditioned upon an applicant's acceptance of an EMI condition, to the effect that FAA concerns relating to EMI must be resolved to the FAA's satisfaction before a grant of program test authority may issue. Peaches here manifests its consent to such condition attendant to a construction permit.

Therefore, no purpose would be served by trying the issue, inasmuch as there is no factual dispute. See §1.251(a)(1). Instead, the Presiding Judge should grant summary decision contingent upon acceptance by the relevant applicants of a suitable EMI condition on the permit.

Respectfully submitted,

David Honig
1800 N.W. 187th Street
Miami, Florida 33056
(305) 628-3600

Counsel for Peaches Broadcasting, Ltd.

March 13, 1991

2/ Peaches' engineering consultant, Thomas Johnson, has further advised Peaches that no possible site which would meet FCC city of license and interference restrictions would not have an EMI problem.

John P. Allen

Airspace Consultant

Telephone
(904) 261-6523
FAX (904) 277-3651

P.O. Box 1008
Fernandina Beach, Florida 32034

STATE OF FLORIDA)

)

COUNTY OF NASSAU)

AFFIDAVIT OF JOHN P. ALLEN

I, John P. Allen, being first duly sworn, do hereby depose and state that I am an Airspace Consultant in private practice, with offices at 1628 Calhoun Street, Fernandina Beach, Florida. My qualifications are a matter of record with the Federal Aviation Administration (FAA) and the Federal Communications Commission (FCC). A brief resume is attached hereto as "Attachment A."

In March of 1991, I was retained by Peaches Broadcasting, Ltd., ("Peaches") to conduct an independent electromagnetic interference (EMI) evaluation of their proposed antenna tower location near Stokesville Gerogia. Specifically, I was requested to determine whether or not the proposed location, height, frequency and effective radiated power could have potential brute force or intermodulation products on existing or planned FAA navigational facilities, within the Jacksonville, Florida area.

My independent EMI evaluation was conducted with the FAA's Airspace Analysis Model Version 4.01, as supplied by FAA's Spectrum Engineering Branch (ASM-500). The FM data used in the analysis was current as of February, 1991. The programs standard generic antenna (6 bay) was used in the analysis.

The evaluation of Peaches proposed location Coordinates: Latitude 30-22-28 North - Longitude 82-01-36 West, center of radiation at 404 feet AMSL, disclosed 7 localizers (navigational facilities) within a 60 nautical mile radius of the proposed site. Through the default criteria contained within the program, only 5 localizers had to be analyzed. Of the 5 localizers analyzed, 3 had potential EMI products. The CRG localizer serving Runway 31 at the Craig Municipal Airport, Jacksonville, FL. The CZH localizer serving Runway 13 at the Jacksonville International Airport, and the CZH localizer back course serving Runway 31 at the Jacksonville International Airport Jacksonville, FL..

Peaches's proposal demonstrated a potential of 99 and 110 points of intermodulation to the CRG localizer, a potential of 3,698 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. A copy of the analysis is enclosed as Attachment "B."

After evaluation the Peaches application, I was specifically requested to evaluate the remaining applicants proposed sites to determine if they also had potential EMI products.

The next applicant evaluated was White Broadcasting Partnership's proposed site at Coordinates: Latitude 30-23-25 North - Longitude 82-00-37 West, with a center of radiation at 404 feet AMSL. White's proposal demonstrated a potential of 101 and 116 points of intermodulation to the CRG localizer, a potential of 3,701 point of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "C."

The next applicant evaluated was Sage Broadcasting proposed site at Coordinates: Latitude 30-17-08 North - Longitude 82-06-01 West with a center of radiation at 430 feet AMSL. Sage Broadcasting's proposal demonstrated a potential of 89 and 99 points of intermodulation to the CRG localizer, a potential of 3,313 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "D."

The next applicant evaluated was First Coast Broadcasting Company proposal located at Coordinates: Latitude 30-19-01 North - Longitude 81-59-03 West, with a center of radiation at 404 feet AMSL. First Coast Broadcasting's proposal demonstrated a

potential of 106 and 122 points of intermodulation to the CRG localizer, a potential of 3,594 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "E."

The next applicant evaluated was Doug Johnson's proposed site at Coordinates: Latitude 30-22-27 North - Longitude 82-01-36 West, with a center of radiation at 404 feet AMSL. Doug Johnson's proposal demonstrated a potential of 99 and 110 points of intermodulation to the CRG localizer, a potential of 3,698 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "F."

The next applicant evaluated was Northeast Florida Broadcasting Company proposal located at Coordinates: Latitude 30-22-28 North - Longitude 82-01-36 West, with a center of radiation at 404 feet AMSL. Northeast Florida's proposal demonstrated a potential of 99 and 110 points of intermodulation to the CRG localizer, a potential of 3,698 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "G."

The last applicant evaluated was Jem Productions, L.P. proposal located at Coordinates: Latitude 30-17-54 North - Longitude 82-00-55 West, with a center of radiation at 423 feet AMSL. Jem Productions's proposal demonstrated a potential of 103 and 120 points of intermodulation to the CRG localizer, a potential of 3,495 points of intermodulation to the CZH localizer, and a potential of 3,701 points of intermodulation to the CZH localizer back course. See Attachment "H."

After completing the aforementioned evaluations, I verified my preliminary findings with the FAA's Southern Regional Office in Atlanta, Georgia. The FAA verified that each applicant with one exception, had in fact received a letter advising them of the potential electromagnetic interference, and that if it was not eliminated, that a hazard determination would be forthcoming. The one exception was that FAA had no notice of proposed construction from Jem Productions. I requested FAA to review their records from late December of 1989 to early 1990, to verify that they did not have a filing. The FAA after reviewing their records confirmed that they are not in possession of a notice of proposed construction from Jem Productions.

In conclusion, it appears that all the applicants in the Baldwin proceeding, will have to negotiate a solution with FAA, regarding the potential electromagnetic interference to the existing navigational facilities within the Jacksonville, Florida area.

Respectfully submitted,

John P. Allen

John P. Allen

Subscribed and sworn to before me, the undersigned Notary Public, this 11th day of March, 1991, by the within-named John P. Allen, well known to me to be the person executing this document.

Peggy L. Davis

Notary Public

My Commission Expires:

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: JUNE 13, 1992.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

Attachment "A"

ABOUT JOHN P. ALLEN

PROFESSIONAL EXPERIENCE:

Airspace Consultant 1981-Present: Conducts aeronautical evaluations for proposed construction or alteration of structures; files appropriate forms with the Federal Aviation Administration; amends aeronautical surfaces when required; conducts negotiations and provides testimony on behalf of sponsors with FAA, FCC or local governmental bodies concerning technical matters relating to Aviation Safety.

FAA Air Traffic Controller 1968 to 1981

U. S. Air Force Air Traffic Controller 1964 to 1968

PROFESSIONAL ACTIVITIES:

Representative to the National Transportation Safety Board as an expert in air traffic control 1975 to 1977

Chairman of the Facility Air Traffic Technical Advisory Committee 1977

Representative to the National Aviation Safety Council 1977 to 1981

Member of the Society of Broadcast Engineers

Member of the Fernandina Beach Airport Advisory Commission

Associate Membership:

Association of Federal Communication Consulting Engineers

National Association of Broadcasters

EDUCATION:

Bachelor of Science Degree. Management/Small Business Administration 1977, Jones College, Jacksonville, Florida

Professional Certifications: Air Traffic Controller

PRINT DATE: 03-10-1991 14:45:57 RFI .PRT ATTACHMENT "B"

Airspace case #: PEACHES Site: BALDWIN, FL
Date: 031091
Navaid Identifier: CRG
Navaid Frequency (MHz): 111.70

Navaid Latitude: 30. 20 40
Navaid Longitude: 81. 31 13

Runway Heading (True): 31.0
Runway Elevation (Ft. MSL): 42.
Runway Length (Ft): 4007.

Prop ID Stat	Call	Freq (MHz)	Latitude	Longitude	ERP(KW)	Height (MSL)	Range (NM)	Heading (True)	Lic Stat
1	WNCM	88.10	30. 16 34	81. 33 53	1.000	512.	4.70	29.31	L
2	WTLG	88.30	29. 54 34	82. 6 2	7.000	433.	39.85	49.08	L
3	WJFR	88.70	30. 19 43	81. 41 42	8.000	371.	9.10	84.01	L
4	WJCT	89.90	30. 16 53	81. 34 15	97.000	837.	4.60	34.69	L
5	WYFB	90.50	29. 52 8	82. 12 4	97.000	814.	45.42	51.08	L
6	WKTZ	90.90	30. 16 36	81. 33 47	50.000	486.	4.63	28.58	L
7	WNLE	91.70	30. 37 20	81. 31 48	10.000	174.	16.67	178.27	C
8	WNLE	91.70	30. 37 20	81. 31 48	3.000	190.	16.67	178.27	L
9	WNLE	91.70	30. 37 20	81. 31 48	38.000	174.	16.67	178.27	A
10	NEWx	91.90	29. 38 54	81. 39 42	3.000	171.	42.41	9.98	A
11	NEWx	91.90	29. 55 5	81. 23 26	3.000	341.	26.45	345.26	A
12	WJXR	92.10	30. 17 54	82. 0 55	3.000	423.	25.79	83.84	L
13	WJXR	92.10	30. 17 54	82. 0 55	6.000	423.	25.79	83.84	C
14	WOKF	92.50	30. 43 45	81. 56 21	3.000	364.	31.65	136.84	A
15	WZAZ	92.70	30. 4 12	81. 38 50	1.300	515.	17.73	21.79	C
16	WZAZ	92.70	30. 4 12	81. 38 50	3.000	318.	17.73	21.79	L
17	WAIA	93.30	30. 33 22	81. 33 13	50.000	469.	12.82	172.27	L
18	NEW-	94.30	30. 16 23	81. 33 13	.009	299.	4.62	21.95	A
19	WAPE	95.10	30. 19 22	81. 38 34	100.000	997.	6.48	78.42	L
20	WEJZ	96.10	30. 19 22	81. 38 34	100.000	997.	6.48	78.42	L
21	WKQL	96.90	30. 16 34	81. 33 53	98.000	1004.	4.70	29.31	L
22	WKQL	96.90	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	C
23	WUVU	97.70	29. 54 26	81. 18 51	3.000	200.	28.33	337.82	L
24	WUVU	97.90	30. 6 12	81. 28 8	50.000	495.	14.71	349.56	C
25	WQIK	99.10	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	L
26	WIOI	100.70	30. 16 53	81. 34 15	8.000	551.	4.60	34.69	A
27	WIOI	100.70	30. 49 17	81. 44 13	36.000	1476.	30.73	158.64	L
28	WHJX	101.50	30. 49 17	81. 44 13	100.000	1476.	30.73	158.64	L
29	WHJX	101.50	30. 49 18	81. 44 10	100.000	1453.	30.73	158.73	C
30	WIVY	102.90	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	A
31	WFYV	104.50	30. 16 34	81. 33 53	100.000	1033.	4.70	29.31	C
32	NEWx	105.30	30. 34 59	81. 31 34	6.000	331.	14.32	178.79	A
33	NEWx	105.30	30. 35 6	81. 32 8	3.000	341.	14.45	176.87	A
34	NEWx	105.30	30. 35 6	81. 32 8	6.000	338.	14.45	176.87	A
35	NEWx	105.30	30. 35 42	81. 31 5	6.000	331.	15.03	180.44	A

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	36	NEWx	105.30	30.	38	53	81.	27	27	6.000	331.	18.50	190.10	A
	37	NEWx	105.30	30.	38	59	81.	27	30	6.000	338.	18.59	189.92	A
	38	NEWx	105.30	30.	39	5	81.	27	37	6.000	312.	18.68	189.56	A
	39	NEWx	105.30	30.	39	9	81.	26	31	6.000	338.	18.92	192.36	A
	40	NEWx	105.30	30.	39	20	81.	27	11	6.000	331.	18.99	190.55	A
	41	NEWx	105.30	30.	39	27	81.	26	3	6.000	328.	19.30	193.33	A
	42	NEWx	105.30	30.	39	58	81.	26	13	6.000	331.	19.77	192.58	A
	43	NEWx	105.30	30.	40	2	81.	26	17	6.000	331.	19.83	192.38	A
	44	WSOS	105.50	29.	50	52	81.	19	42	.000	0.	31.42	341.51	A
	45	WSOS	105.50	29.	55	5	81.	23	26	2.250	404.	26.45	345.26	L
*	46	PROP	105.70	30.	22	28	82.	1	36	6.000	400.	26.28	93.93	A
	47	WEAG	106.30	29.	55	50	82.	6	16	1.350	643.	39.19	50.67	L
	48	WKBX	106.30	30.	48	4	81.	40	43	3.000	331.	28.59	163.38	L
	49	NEWx	106.50	30.	9	29	81.	23	41	3.000	335.	12.94	329.80	A
	50	NEWx	106.50	30.	13	8	81.	30	3	3.000	344.	7.60	352.38	A
	51	NEWx	106.50	30.	15	26	81.	27	1	3.000	348.	6.37	325.28	A
	52	NEWx	106.50	30.	15	30	81.	27	2	3.000	338.	6.30	325.04	A
	53	NEWx	106.50	30.	15	33	81.	26	13	3.000	338.	6.69	319.84	A
	54	NEWx	106.50	30.	15	38	81.	27	18	3.000	341.	6.06	326.11	A
	55	NEWx	106.50	30.	15	39	81.	27	16	3.000	341.	6.07	325.79	A
	56	NEWx	106.50	30.	15	39	81.	27	18	3.000	341.	6.05	326.02	A
	57	NEWx	106.50	30.	15	40	81.	27	16	3.000	338.	6.05	325.70	A
	58	NEWx	106.50	30.	15	40	81.	27	18	3.000	341.	6.04	325.93	A
	59	NEWx	106.50	30.	16	31	81.	24	40	3.000	338.	7.01	306.27	A
	60	WCRJ	107.30	30.	16	53	81.	34	15	100.000	719.	4.60	34.69	L
	61	VNZC	108.20	30.	12	46	81.	53	28	.050	56.	20.78	67.65	V
	62	Vxxx	111.00	30.	29	33	81.	41	24	.050	55.	12.49	135.33	V
	63	VCRG	114.50	30.	20	19	81.	30	36	.050	57.	.64	303.33	V
	64	VVQQ	117.90	30.	13	12	81.	52	16	.050	56.	19.65	67.67	V

Adjacent Channel (A2) analysis not required for station PROP
due to frequency separation of NAVAID > 500 KHz

No Receiver Overload (B2) points found.

Plot file name is : PROP1E16.plt

Total of 99 Intermodulation (B1) points at 111.70 for stations
PROP(46), WIVY(30), and WKQL(22).
The 3-frequency equisignal intermodulation (B1) interference threshold
for the above combination is -60.47 dBm, based on a constant
-86.00 dBm localizer signal level.

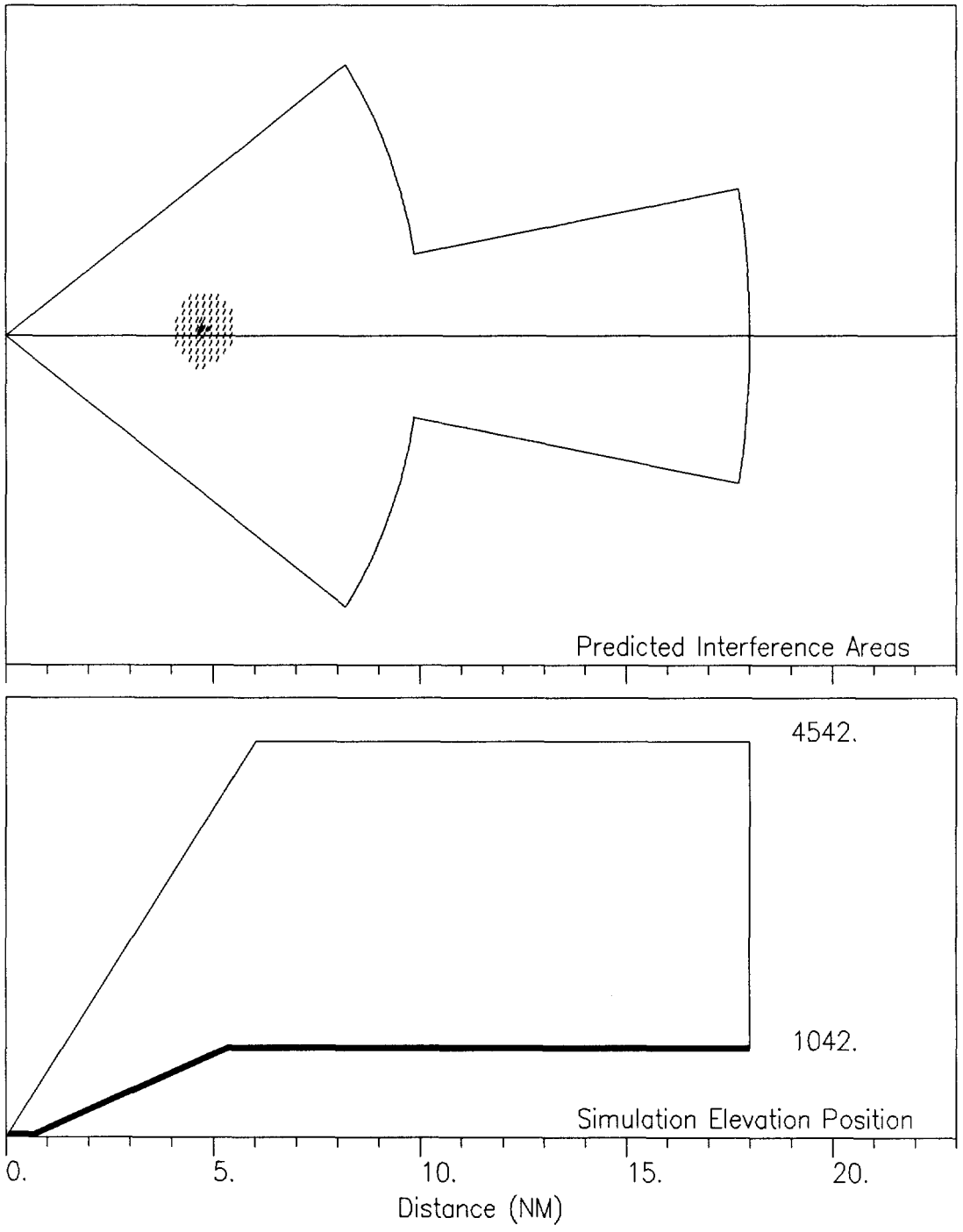
Plot file name is : PROP1E15.plt

Total of 110 Intermodulation (B1) points at 111.70 for stations

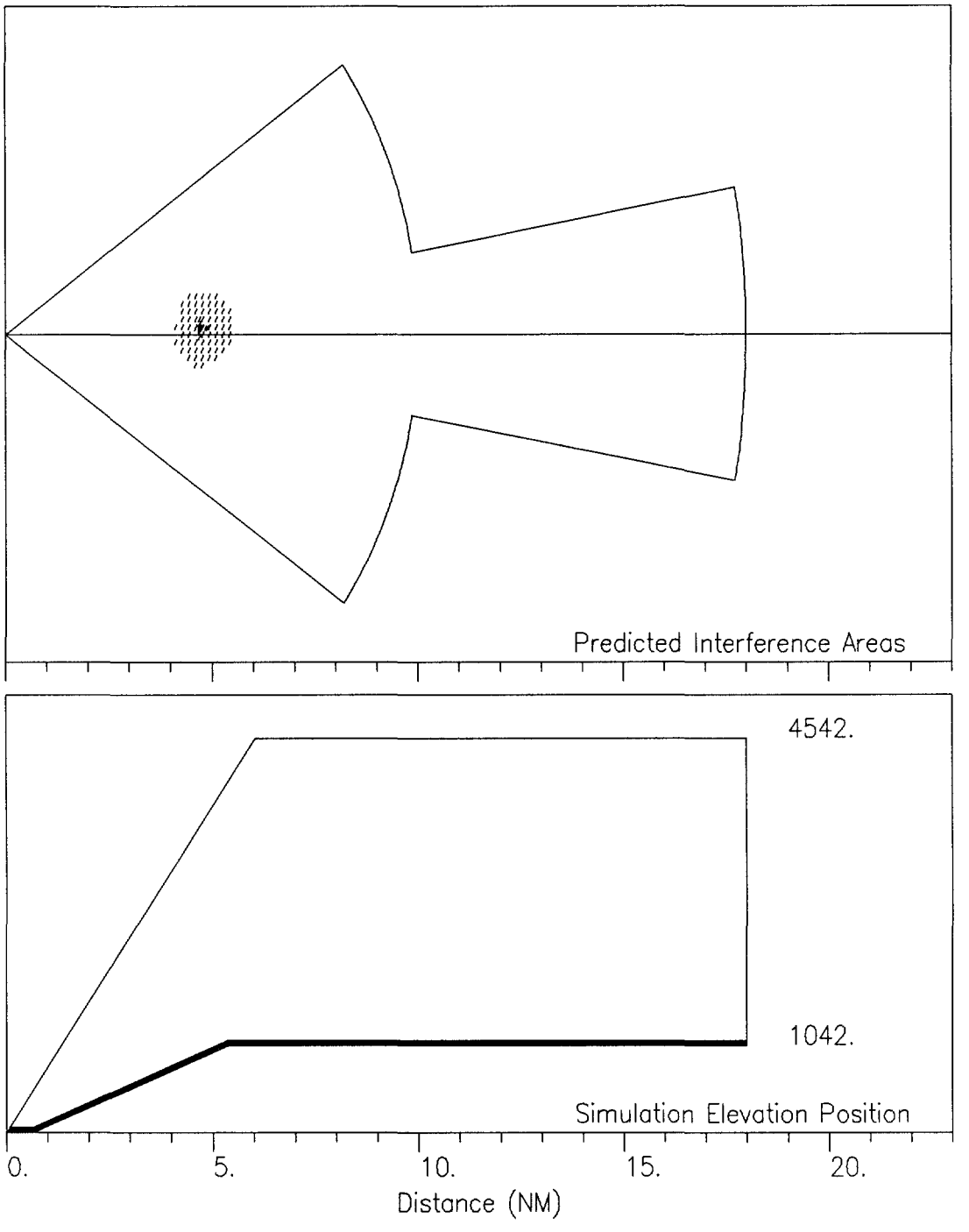
PROP(46), WIVY(30), and WKQL(21).
T 3-frequency equisignal intermodulation (B1) interference threshold for the above combination is -60.47 dBm, based on a constant -86.00 dBm localizer signal level.

Listing of 3-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	Freq 3	ID	B1 Freq	Offset	# Points
105.70	(46)	102.90	(30)	96.90	(22)	111.70	on-channel	99
105.70	(46)	102.90	(30)	96.90	(21)	111.70	on-channel	110



Airspace case #: PEACHES Site: BALDWIN, FL
Date:030591 Plot filename: PROP1E15.plt Service Volume Bottom
Intermod (B1) plot: PROP (51), WIVY (30), & WKQL (21)
Frequencies: PROP = 105.70 MHz WIVY = 102.90 MHz WKQL = 96.90 MHz
Navaid: CRG Frequency: 111.70 MHz Elevation (Ft. MSL): 42.
Runway heading: 31.0



Airspace case #: PEACHES Site: BALDWIN, FL
Date:030591 Plot filename: PROP1E16.plt Service Volume Bottom
Intermod (B1) plot: PROP (51), WIVY (30), & WKQL (22)
Frequencies: PROP = 105.70 MHz WIVY = 102.90 MHz WKQL = 96.90 MHz
Navaid: CRG Frequency: 111.70 MHz Elevation (Ft. MSL): 42.
Runway heading: 31.0

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Airspace case #: PEACHES Site: BALDWIN, FL
Date: 031091
Navaid Identifier: CZH
Navaid Frequency (MHz): 108.90

Navaid Latitude: 30. 28 36
Navaid Longitude: 81. 40 49

Runway Heading (True): 131.0
Runway Elevation (Ft. MSL): 31.
Runway Length (Ft): 7700.

Prop ID Stat	Call	Freq (MHz)	Latitude	Longitude	ERP(KW)	Height (MSL)	Range (NM)	Heading (True)	Lic Stat
1	WNCM	88.10	30. 16 34	81. 33 53	1.000	512.	13.44	333.57	L
2	WJFR	88.70	30. 19 43	81. 41 42	8.000	371.	8.92	4.90	L
3	WJCT	89.90	30. 16 53	81. 34 15	97.000	837.	13.01	334.20	L
4	W213	90.50	31. 8 54	81. 36 48	.004	469.	40.45	184.89	C
5	WKTZ	90.90	30. 16 36	81. 33 47	50.000	486.	13.45	333.18	L
6	WNLE	91.70	30. 37 20	81. 31 48	10.000	174.	11.69	221.64	C
7	WNLE	91.70	30. 37 20	81. 31 48	3.000	190.	11.69	221.64	L
8	WNLE	91.70	30. 37 20	81. 31 48	38.000	174.	11.69	221.64	A
9	WJXR	92.10	30. 17 54	82. 0 55	3.000	423.	20.37	58.32	L
10	WJXR	92.10	30. 17 54	82. 0 55	6.000	423.	20.37	58.32	C
11	WOKF	92.50	30. 43 45	81. 56 21	3.000	364.	20.21	138.57	A
12	WOKF	92.50	30. 52 29	82. 1 10	3.000	387.	29.61	143.76	C
13	WZAZ	92.70	30. 4 12	81. 38 50	1.300	515.	24.46	355.99	C
14	WZAZ	92.70	30. 4 12	81. 38 50	3.000	318.	24.46	355.99	L
15	WAIA	93.30	30. 33 22	81. 33 13	50.000	469.	8.10	233.94	L
16	NEW-	94.30	30. 16 23	81. 33 13	.009	299.	13.86	331.78	A
17	WAPE	95.10	30. 19 22	81. 38 34	100.000	997.	9.44	348.13	L
18	WEJZ	96.10	30. 19 22	81. 38 34	100.000	997.	9.44	348.13	L
19	WKQL	96.90	30. 16 34	81. 33 53	98.000	1004.	13.44	333.57	L
20	WKQL	96.90	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	C
21	WUVU	97.90	30. 6 12	81. 28 8	50.000	495.	24.93	333.95	C
22	WQIK	99.10	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	L
23	WIOI	100.70	30. 16 53	81. 34 15	8.000	551.	13.01	334.20	A
24	WIOI	100.70	30. 49 17	81. 44 13	36.000	1476.	20.89	171.95	L
25	WHJX	101.50	30. 49 17	81. 44 13	100.000	1476.	20.89	171.95	L
26	WHJX	101.50	30. 49 18	81. 44 10	100.000	1453.	20.90	172.07	C
27	WBGA	102.50	31. 9 13	81. 58 0	100.000	1030.	43.21	160.03	L
28	WIVY	102.90	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	A
29	WACL	103.30	31. 9 22	81. 58 19	100.000	1047.	43.45	159.76	L
30	WFYV	104.50	30. 16 34	81. 33 53	100.000	1033.	13.44	333.57	C
31	NEWx	105.30	30. 34 59	81. 31 34	6.000	331.	10.21	231.30	A
32	NEWx	105.30	30. 35 6	81. 32 8	3.000	341.	9.91	229.01	A
33	NEWx	105.30	30. 35 6	81. 32 8	6.000	338.	9.91	229.01	A
34	NEWx	105.30	30. 35 42	81. 31 5	6.000	331.	10.99	229.74	A
35	NEWx	105.30	30. 38 53	81. 27 27	6.000	331.	15.43	228.22	A

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	36	NEWx	105.30	30.	38	59	81.	27	30	6.000	338.	15.47	227.84	A
	37	NEWx	105.30	30.	39	5	81.	27	37	6.000	312.	15.46	227.31	A
	38	NEWx	105.30	30.	39	9	81.	26	31	6.000	338.	16.21	229.41	A
	39	NEWx	105.30	30.	39	20	81.	27	11	6.000	331.	15.91	227.56	A
	40	NEWx	105.30	30.	39	27	81.	26	3	6.000	328.	16.71	229.52	A
	41	NEWx	105.30	30.	39	58	81.	26	13	6.000	331.	16.95	227.88	A
	42	NEWx	105.30	30.	40	2	81.	26	17	6.000	331.	16.95	227.58	A
*	43	PROP	105.70	30.	22	28	82.	1	36	6.000	404.	18.94	71.11	P
	44	WKBX	106.30	30.	48	4	81.	40	43	3.000	331.	19.47	180.25	L
	45	NEWx	106.50	30.	9	29	81.	23	41	3.000	335.	24.17	322.27	A
	46	NEWx	106.50	30.	13	8	81.	30	3	3.000	344.	18.04	329.01	A
	47	NEWx	106.50	30.	15	26	81.	27	1	3.000	348.	17.75	317.88	A
	48	NEWx	106.50	30.	15	30	81.	27	2	3.000	338.	17.69	317.77	A
	49	NEWx	106.50	30.	15	33	81.	26	13	3.000	338.	18.14	316.01	A
	50	NEWx	106.50	30.	15	38	81.	27	18	3.000	341.	17.44	318.03	A
	51	NEWx	106.50	30.	15	39	81.	27	16	3.000	341.	17.45	317.93	A
	52	NEWx	106.50	30.	15	39	81.	27	18	3.000	341.	17.43	318.00	A
	53	NEWx	106.50	30.	15	40	81.	27	16	3.000	338.	17.43	317.89	A
	54	NEWx	106.50	30.	15	40	81.	27	18	3.000	341.	17.41	317.96	A
	55	NEWx	106.50	30.	16	31	81.	24	40	3.000	338.	18.44	310.93	A
	56	WCRJ	107.30	30.	16	53	81.	34	15	100.000	719.	13.01	334.20	L
	57	VNZC	108.20	30.	12	46	81.	53	28	.050	56.	19.23	34.59	V
	58	VSSI	109.80	31.	3	1	81.	26	46	.050	42.	36.47	199.33	V
	59	Vxxx	111.00	30.	29	33	81.	41	24	.050	55.	1.07	152.10	V
	60	VCRG	114.50	30.	20	19	81.	30	36	.050	57.	12.09	313.23	V
	61	VVQQ	117.90	30.	13	12	81.	52	16	.050	56.	18.30	32.69	V

Adjacent Channel (A2) analysis not required for station PROP
due to frequency separation of NAVAID > 500 KHz

No Receiver Overload (B2) points found.

Plot file name is : PROP38__.plt

Total of 3698 Intermodulation (B1) points at 108.90 for stations
WCRJ(56) and PROP(43).
The 2-frequency equisignal intermodulation (B1) interference threshold
for the above combination is -111.02 dBm, based on a constant
-86.00 dBm localizer signal level.

Listing of 2-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	B1 Freq	Offset	# Points

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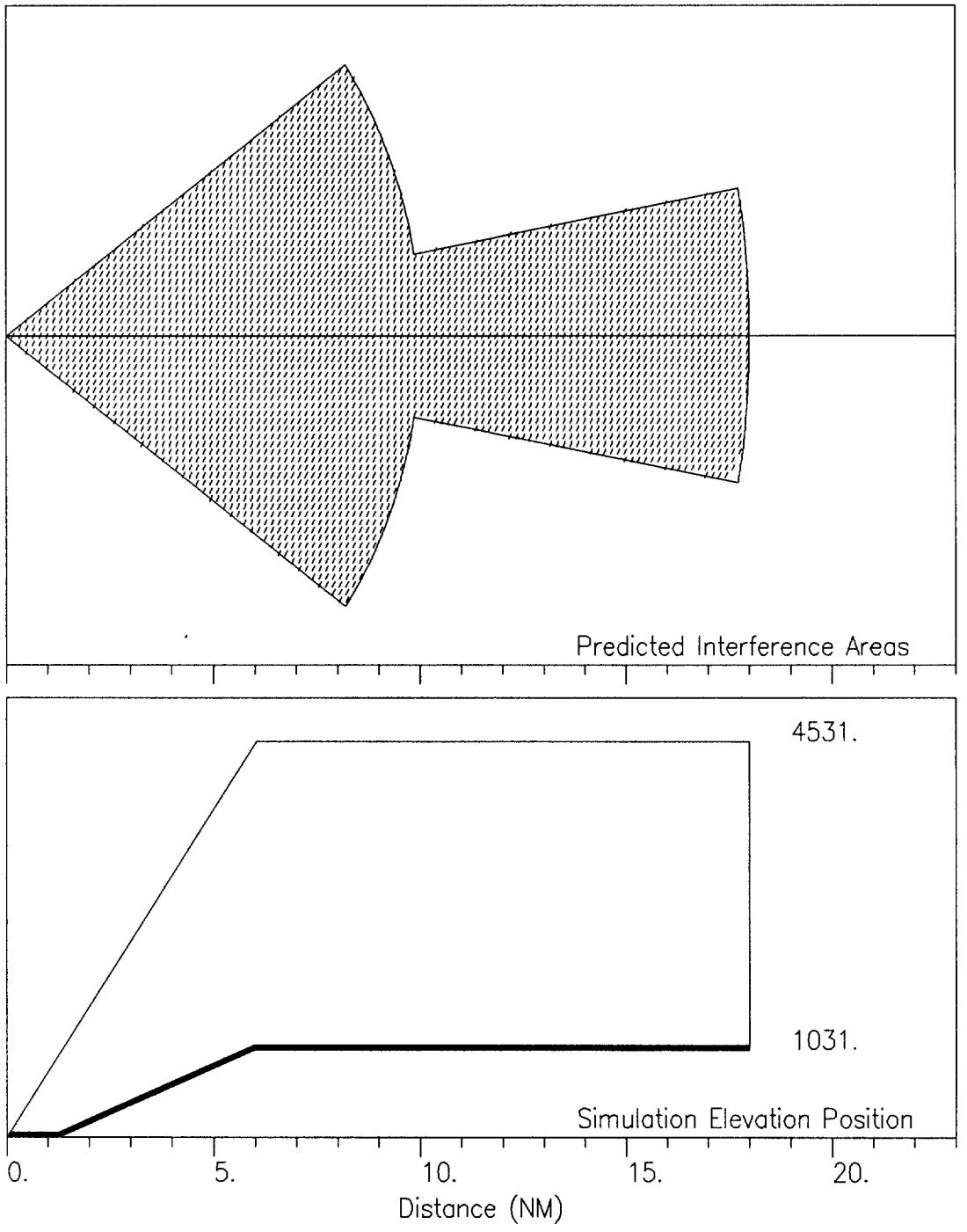
.30(56) 105.70(43) 108.90 on-channel 3698

Listing of 3-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	Freq 3	ID	B1 Freq	Offset	# Points

No 3-frequency intermodulation interference found.



Airspace case #: PEACHES Site: BALDWIN, FL
Date:031091 Plot filename: PROP38__.plt Service Volume Bottom
Intermodulation (B1) plot: PROP (43) & WCRJ (56)
Frequencies: PROP = 105.70 MHz WCRJ = 107.30 MHz
Navaid: CZH Frequency: 108.90 MHz Elevation (Ft. MSL): 31.
Runway heading: 131.0

PRINT DATE: 03-10-1991 16:21:58 RFI .PRT

Airspace case #: PEACHES Site: BALDWIN, FL
Date: 031091
Navaid Identifier: CZH
Navaid Frequency (MHz): 108.90

Navaid Latitude: 30. 28 36
Navaid Longitude: 81. 40 49

Runway Heading (True): 311.0
Runway Elevation (Ft. MSL): 31.
Runway Length (Ft): 7700.

Prop Stat	ID	Call	Freq (MHz)	Latitude	Longitude	ERP(KW)	Height (MSL)	Range (NM)	Heading (True)	Lic Stat
	1	WNCM	88.10	30. 16 34	81. 33 53	1.000	512.	13.44	333.57	L
	2	WJFR	88.70	30. 19 43	81. 41 42	8.000	371.	8.92	4.90	L
	3	WJCT	89.90	30. 16 53	81. 34 15	97.000	837.	13.01	334.20	L
	4	WKTZ	90.90	30. 16 36	81. 33 47	50.000	486.	13.45	333.18	L
	5	WNLE	91.70	30. 37 20	81. 31 48	10.000	174.	11.69	221.64	C
	6	WNLE	91.70	30. 37 20	81. 31 48	3.000	190.	11.69	221.64	L
	7	WNLE	91.70	30. 37 20	81. 31 48	38.000	174.	11.69	221.64	A
	8	NEWx	91.90	29. 55 5	81. 23 26	3.000	341.	36.73	335.86	A
	9	WJXR	92.10	30. 17 54	82. 0 55	3.000	423.	20.37	58.32	L
	10	WJXR	92.10	30. 17 54	82. 0 55	6.000	423.	20.37	58.32	C
	11	WOKF	92.50	30. 43 45	81. 56 21	3.000	364.	20.21	138.57	A
	12	WOKF	92.50	30. 52 29	82. 1 10	3.000	387.	29.61	143.76	C
	13	WZAZ	92.70	30. 4 12	81. 38 50	1.300	515.	24.46	355.99	C
	14	WZAZ	92.70	30. 4 12	81. 38 50	3.000	318.	24.46	355.99	L
	15	WAIA	93.30	30. 33 22	81. 33 13	50.000	469.	8.10	233.94	L
	16	NEW-	94.30	30. 16 23	81. 33 13	.009	299.	13.86	331.78	A
	17	WAPE	95.10	30. 19 22	81. 38 34	100.000	997.	9.44	348.13	L
	18	WEJZ	96.10	30. 19 22	81. 38 34	100.000	997.	9.44	348.13	L
	19	WKQL	96.90	30. 16 34	81. 33 53	98.000	1004.	13.44	333.57	L
	20	WKQL	96.90	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	C
	21	WUVU	97.70	29. 54 26	81. 18 51	3.000	200.	39.09	330.94	L
	22	WUVU	97.90	30. 6 12	81. 28 8	50.000	495.	24.93	333.95	C
	23	WQIK	99.10	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	L
	24	WIOI	100.70	30. 16 53	81. 34 15	8.000	551.	13.01	334.20	A
	25	WIOI	100.70	30. 49 17	81. 44 13	36.000	1476.	20.89	171.95	L
	26	WHJX	101.50	30. 49 17	81. 44 13	100.000	1476.	20.89	171.95	L
	27	WHJX	101.50	30. 49 18	81. 44 10	100.000	1453.	20.90	172.07	C
	28	WIVY	102.90	30. 16 34	81. 33 53	98.000	1033.	13.44	333.57	A
	29	WFYV	104.50	30. 16 34	81. 33 53	100.000	1033.	13.44	333.57	C
	30	NEWx	105.30	30. 34 59	81. 31 34	6.000	331.	10.21	231.30	A
	31	NEWx	105.30	30. 35 6	81. 32 8	3.000	341.	9.91	229.01	A
	32	NEWx	105.30	30. 35 6	81. 32 8	6.000	338.	9.91	229.01	A
	33	NEWx	105.30	30. 35 42	81. 31 5	6.000	331.	10.99	229.74	A
	34	NEWx	105.30	30. 38 53	81. 27 27	6.000	331.	15.43	228.22	A
	35	NEWx	105.30	30. 38 59	81. 27 30	6.000	338.	15.47	227.84	A

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	36	NEWx	105.30	30.	39	5	81.	27	37	6.000	312.	15.46	227.31	A
	37	NEWx	105.30	30.	39	9	81.	26	31	6.000	338.	16.21	229.41	A
	38	NEWx	105.30	30.	39	20	81.	27	11	6.000	331.	15.91	227.56	A
	39	NEWx	105.30	30.	39	27	81.	26	3	6.000	328.	16.71	229.52	A
	40	NEWx	105.30	30.	39	58	81.	26	13	6.000	331.	16.95	227.88	A
	41	NEWx	105.30	30.	40	2	81.	26	17	6.000	331.	16.95	227.58	A
	42	WSOS	105.50	29.	50	52	81.	19	42	.000	0.	41.92	334.18	A
	43	WSOS	105.50	29.	55	5	81.	23	26	2.250	404.	36.73	335.86	L
*	44	PROP	105.70	30.	22	28	82.	1	36	6.000	404.	18.94	71.11	P
	45	WKBX	106.30	30.	48	4	81.	40	43	3.000	331.	19.47	180.25	L
	46	NEWx	106.50	30.	9	29	81.	23	41	3.000	335.	24.17	322.27	A
	47	NEWx	106.50	30.	13	8	81.	30	3	3.000	344.	18.04	329.01	A
	48	NEWx	106.50	30.	15	26	81.	27	1	3.000	348.	17.75	317.88	A
	49	NEWx	106.50	30.	15	30	81.	27	2	3.000	338.	17.69	317.77	A
	50	NEWx	106.50	30.	15	33	81.	26	13	3.000	338.	18.14	316.01	A
	51	NEWx	106.50	30.	15	38	81.	27	18	3.000	341.	17.44	318.03	A
	52	NEWx	106.50	30.	15	39	81.	27	16	3.000	341.	17.45	317.93	A
	53	NEWx	106.50	30.	15	39	81.	27	18	3.000	341.	17.43	318.00	A
	54	NEWx	106.50	30.	15	40	81.	27	16	3.000	338.	17.43	317.89	A
	55	NEWx	106.50	30.	15	40	81.	27	18	3.000	341.	17.41	317.96	A
	56	NEWx	106.50	30.	16	31	81.	24	40	3.000	338.	18.44	310.93	A
	57	WCRJ	107.30	30.	16	53	81.	34	15	100.000	719.	13.01	334.20	L
	58	VNZC	108.20	30.	12	46	81.	53	28	.050	56.	19.23	34.59	V
	59	Vxxx	111.00	30.	29	33	81.	41	24	.050	55.	1.07	152.10	V
	60	VCRG	114.50	30.	20	19	81.	30	36	.050	57.	12.09	313.23	V
	61	VVQQ	117.90	30.	13	12	81.	52	16	.050	56.	18.30	32.69	V

Adjacent Channel (A2) analysis not required for station PROP
due to frequency separation of NAVAID > 500 KHz

No Receiver Overload (B2) points found.

Plot file name is : PROP39__.plt

Total of 3701 Intermodulation (B1) points at 108.90 for stations
WCRJ(57) and PROP(44).
The 2-frequency equisignal intermodulation (B1) interference threshold
for the above combination is -111.02 dBm, based on a constant
-86.00 dBm localizer signal level.

Listing of 2-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	B1 Freq	Offset	# Points

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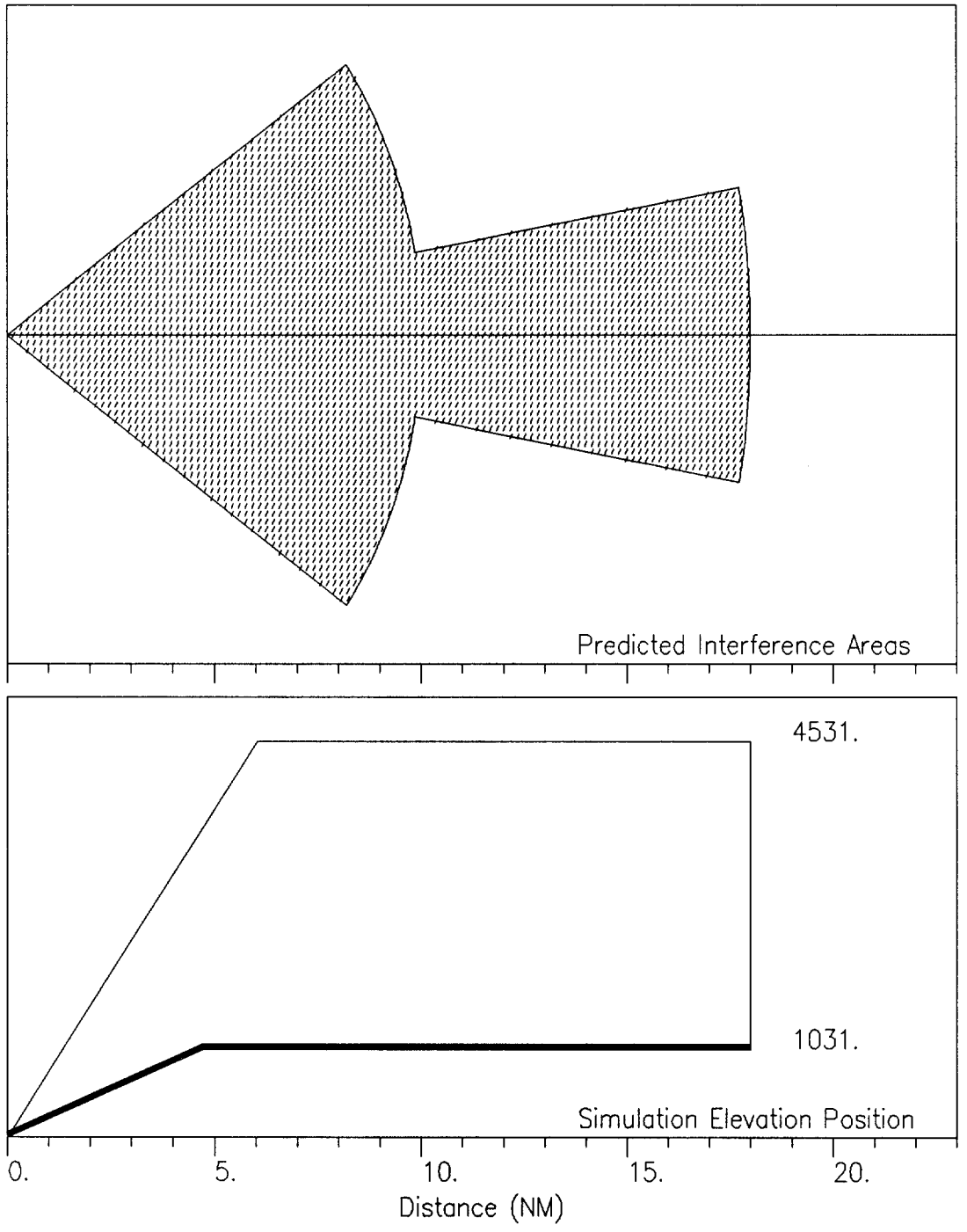
.30(57) 105.70(44) 108.90 on-channel 3701

Listing of 3-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	Freq 3	ID	B1 Freq	Offset	# Points

No 3-frequency intermodulation interference found.



Airspace case #: PEACHES Site: BALDWIN, FL
Date:031091 Plot filename: PROP39__.plt Service Volume Bottom
Intermodulation (B1) plot: PROP (44) & WCRJ (57)
Frequencies: PROP = 105.70 MHz WCRJ = 107.30 MHz
Navaid: CZH Frequency: 108.90 MHz Elevation (Ft. MSL): 31.
Runway heading: 311.0

PRINT DATE: 03-10-1991 14:48:47 RFI .PRT ATTACHMENT "C"

Airspace case #: WHITE Site: BALDWIN, FL
Date: 031091
Navaid Identifier: CRG
Navaid Frequency (MHz): 111.70

Navaid Latitude: 30. 20 40
Navaid Longitude: 81. 31 13

Runway Heading (True): 31.0
Runway Elevation (Ft. MSL): 42.
Runway Length (Ft): 4007.

Prop ID	Call	Freq (MHz)	Latitude	Longitude	ERP(KW)	Height (MSL)	Range (NM)	Heading (True)	Lic Stat
1	WNCM	88.10	30. 16 34	81. 33 53	1.000	512.	4.70	29.31	L
2	WTLG	88.30	29. 54 34	82. 6 2	7.000	433.	39.85	49.08	L
3	WJFR	88.70	30. 19 43	81. 41 42	8.000	371.	9.10	84.01	L
4	WJCT	89.90	30. 16 53	81. 34 15	97.000	837.	4.60	34.69	L
5	WYFB	90.50	29. 52 8	82. 12 4	97.000	814.	45.42	51.08	L
6	WKTZ	90.90	30. 16 36	81. 33 47	50.000	486.	4.63	28.58	L
7	WNLE	91.70	30. 37 20	81. 31 48	10.000	174.	16.67	178.27	C
8	WNLE	91.70	30. 37 20	81. 31 48	3.000	190.	16.67	178.27	L
9	WNLE	91.70	30. 37 20	81. 31 48	38.000	174.	16.67	178.27	A
10	NEWx	91.90	29. 38 54	81. 39 42	3.000	171.	42.41	9.98	A
11	NEWx	91.90	29. 55 5	81. 23 26	3.000	341.	26.45	345.26	A
12	WJXR	92.10	30. 17 54	82. 0 55	3.000	423.	25.79	83.84	L
13	WJXR	92.10	30. 17 54	82. 0 55	6.000	423.	25.79	83.84	C
14	WOKF	92.50	30. 43 45	81. 56 21	3.000	364.	31.65	136.84	A
15	WZAZ	92.70	30. 4 12	81. 38 50	1.300	515.	17.73	21.79	C
16	WZAZ	92.70	30. 4 12	81. 38 50	3.000	318.	17.73	21.79	L
17	WAIA	93.30	30. 33 22	81. 33 13	50.000	469.	12.82	172.27	L
18	NEW-	94.30	30. 16 23	81. 33 13	.009	299.	4.62	21.95	A
19	WAPE	95.10	30. 19 22	81. 38 34	100.000	997.	6.48	78.42	L
20	WEJZ	96.10	30. 19 22	81. 38 34	100.000	997.	6.48	78.42	L
21	WKQL	96.90	30. 16 34	81. 33 53	98.000	1004.	4.70	29.31	L
22	WKQL	96.90	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	C
23	WUVU	97.70	29. 54 26	81. 18 51	3.000	200.	28.33	337.82	L
24	WUVU	97.90	30. 6 12	81. 28 8	50.000	495.	14.71	349.56	C
25	WQIK	99.10	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	L
26	WIOI	100.70	30. 16 53	81. 34 15	8.000	551.	4.60	34.69	A
27	WIOI	100.70	30. 49 17	81. 44 13	36.000	1476.	30.73	158.64	L
28	WHJX	101.50	30. 49 17	81. 44 13	100.000	1476.	30.73	158.64	L
29	WHJX	101.50	30. 49 18	81. 44 10	100.000	1453.	30.73	158.73	C
30	WIVY	102.90	30. 16 34	81. 33 53	98.000	1033.	4.70	29.31	A
31	WFYV	104.50	30. 16 34	81. 33 53	100.000	1033.	4.70	29.31	C
32	NEWx	105.30	30. 34 59	81. 31 34	6.000	331.	14.32	178.79	A
33	NEWx	105.30	30. 35 6	81. 32 8	3.000	341.	14.45	176.87	A
34	NEWx	105.30	30. 35 6	81. 32 8	6.000	338.	14.45	176.87	A
35	NEWx	105.30	30. 35 42	81. 31 5	6.000	331.	15.03	180.44	A

	36	NEWx	105.30	30.	38	53	81.	27	27	6.000	331.	18.50	190.10	A
	37	NEWx	105.30	30.	38	59	81.	27	30	6.000	338.	18.59	189.92	A
	38	NEWx	105.30	30.	39	5	81.	27	37	6.000	312.	18.68	189.56	A
	39	NEWx	105.30	30.	39	9	81.	26	31	6.000	338.	18.92	192.36	A
	40	NEWx	105.30	30.	39	20	81.	27	11	6.000	331.	18.99	190.55	A
	41	NEWx	105.30	30.	39	27	81.	26	3	6.000	328.	19.30	193.33	A
	42	NEWx	105.30	30.	39	58	81.	26	13	6.000	331.	19.77	192.58	A
	43	NEWx	105.30	30.	40	2	81.	26	17	6.000	331.	19.83	192.38	A
	44	WSOS	105.50	29.	50	52	81.	19	42	.000	0.	31.42	341.51	A
	45	WSOS	105.50	29.	55	5	81.	23	26	2.250	404.	26.45	345.26	L
*	46	PROP	105.70	30.	23	25	82.	0	37	6.000	404.	25.51	96.19	A
	47	WEAG	106.30	29.	55	50	82.	6	16	1.350	643.	39.19	50.67	L
	48	WKBX	106.30	30.	48	4	81.	40	43	3.000	331.	28.59	163.38	L
	49	NEWx	106.50	30.	9	29	81.	23	41	3.000	335.	12.94	329.80	A
	50	NEWx	106.50	30.	13	8	81.	30	3	3.000	344.	7.60	352.38	A
	51	NEWx	106.50	30.	15	26	81.	27	1	3.000	348.	6.37	325.28	A
	52	NEWx	106.50	30.	15	30	81.	27	2	3.000	338.	6.30	325.04	A
	53	NEWx	106.50	30.	15	33	81.	26	13	3.000	338.	6.69	319.84	A
	54	NEWx	106.50	30.	15	38	81.	27	18	3.000	341.	6.06	326.11	A
	55	NEWx	106.50	30.	15	39	81.	27	16	3.000	341.	6.07	325.79	A
	56	NEWx	106.50	30.	15	39	81.	27	18	3.000	341.	6.05	326.02	A
	57	NEWx	106.50	30.	15	40	81.	27	16	3.000	338.	6.05	325.70	A
	58	NEWx	106.50	30.	15	40	81.	27	18	3.000	341.	6.04	325.93	A
	59	NEWx	106.50	30.	16	31	81.	24	40	3.000	338.	7.01	306.27	A
	60	WCRJ	107.30	30.	16	53	81.	34	15	100.000	719.	4.60	34.69	L
	61	VNZC	108.20	30.	12	46	81.	53	28	.050	56.	20.78	67.65	V
	62	Vxxx	111.00	30.	29	33	81.	41	24	.050	55.	12.49	135.33	V
	63	VCRG	114.50	30.	20	19	81.	30	36	.050	57.	.64	303.33	V
	64	VVQQ	117.90	30.	13	12	81.	52	16	.050	56.	19.65	67.67	V

Adjacent Channel (A2) analysis not required for station PROP
due to frequency separation of NAVAID > 500 KHz

No Receiver Overload (B2) points found.

Plot file name is : PROP1E16.plt

Total of 101 Intermodulation (B1) points at 111.70 for stations
PROP(46), WIVY(30), and WKQL(22).
The 3-frequency equisignal intermodulation (B1) interference threshold
for the above combination is -60.47 dBm, based on a constant
-86.00 dBm localizer signal level.

Plot file name is : PROP1E15.plt

Total of 116 Intermodulation (B1) points at 111.70 for stations

PROP(46), WIVY(30), and WKQL(21).
T' -frequency equisignal intermodulation (B1) interference threshold
for the above combination is -60.47 dBm, based on a constant
-86.00 dBm localizer signal level.

Listing of 3-frequency intermodulation (B1) combinations

Freq 1	ID	Freq 2	ID	Freq 3	ID	B1 Freq	Offset	# Points
105.70	(46)	102.90	(30)	96.90	(22)	111.70	on-channel	101
105.70	(46)	102.90	(30)	96.90	(21)	111.70	on-channel	116