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APR 23 1992

Federal Communications Commission  
Office of the Secretary

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March 27, 1992

APR 23 1992

FCC MAIL BRANCH

Donna R. Searcy  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

**RE: Amendment of FM Table of Allotments  
Comments in MM Docket 92-32**

Dear Ms. Searcy:

Please let this letter and attached spacing study serve as the official comments of Seneca Broadcasting, Inc., licensee of WKCJ (FM), in MM Docket 92-32 involving the communities of Blacksburg and Roanoke, Virginia and Lewisburg, West Virginia. That docket proposes to change the channel of WKCJ at Lewisburg, WV, from 288A to 275A.

WKCJ would prefer not to have its channel changed since this would cause listener confusion and will result in a degradation of its service to the public (although only temporary). However, WKCJ realizes that the upgrading of the two other stations involved will result in an increased service to the public and, therefore, WKCJ will not object provided reasonable expenses, as indicated in the notice, are reimbursed by the petitioner. WKCJ would request that Channel 276A be used in lieu of 275A since this channel will provide WKCJ with more flexibility in future technical changes it hopes to make in an effort to better serve its local listeners. The use of 276A is totally consistent with the other channel assignments involved in this proceeding.

The attached spacing study by Mullaney Engineering indicates that from WKCJ's existing site (37-48-17 / 80-21-03) Channel 276A fully complies with the relevant spacing requirements.

Donna Searcy  
Comments in MM Docket 92-32  
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The address stated below is our current address and should channel 276A be substituted, WKCJ will promptly apply and begin operation on this new channel. Certification is hereby made that copies of this material are being sent today via First Class Mail to Mark J. Prak, Esquire (Counsel for petitioner) and to Julian P. Freret, Esquire (Counsel for Susan Brown).

Sincerely,



Kenneth Bryant, Secy/Treas.  
Seneca Broadcasting, Inc.  
P.O. Box 610  
White Sulphur Springs, WV 24986  
304-536-1310

encl - Spacing Study

cc: Mark J. Prak, Esquire  
Julian P. Ferret, Esquire

MULLANEY ENGINEERING, INC.

\*\*\*\*\* FM CHANNEL STUDY NO. 3 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 17-MAR-92 06:54:39 \*\*\*\*\*  
 \*\*\*\*\*  
 LAST UPDATE: 920316 \*\*\*\*\*

WKCJ	276 A	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
Lewisburg WV	US			HOR PLN	BM TILT	(METER)
37.4817	80.2103 (D.MSS)		HORIZONTAL	6.000	0.000	100.0
			VERTICAL	0.000	0.000	0.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

INTERFERING	DOMESTIC		AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
	DBU	KM	DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
			0.0	160.0	524.8	20.7	35.2
CO CHANNEL ( 40.0)		86.7	45.0	41.2	135.1	10.4	18.6
1ST ADJACENT ( 54.0)		43.7	90.0	82.0	268.9	14.5	25.8
2ND ADJACENT ( 80.0)		9.1	135.0	81.4	267.2	14.4	25.7
3RD ADJACENT (100.0)		2.8	180.0	58.5	191.8	12.4	22.2
			225.0	156.7	514.2	20.5	34.8
			270.0	133.7	438.8	18.9	32.2
			315.0	86.5	283.9	14.9	26.4
PROTECTED ( 60.0)		28.3					
CITY GRADE ( 70.0)		16.2					
			AVERAGE	100.0	328.1	16.2	28.3

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 THIS STUDY LOCATION FALLS WITHIN THE NATIONAL RADIO ASTRONOMY  
 OBSERVATORY QUIET ZONE AT GREEN BANK, WV.  
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AZIMUTH				LAT	LONG	ERP (KW)	HAAT	D	I-CON	P-CON	INTE	PROT	REZLT						
FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MSS)	REL CHN	HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR	IC
									(KM)	(KM)	(KM)	(KM)	(KM)	(KM)	(KM)	(KM)	(KM)	(KM)	(KM)
0.0	0.0	WKCJ	ADD		Lewisburg WV	A	37.4817	80.2103	1ST	275A	H	V			0.0	72.			
143.8	324.4	WAKG	LIC	BLH900904KB	Danville	VA	A 36.4428	79.2305	1ST	277C1	100.H100.V	199			145.9	133.			
281.0	100.4	WCIRFM	LIC	BLH850219LM	Beckley	WV	A 37.5651	81.1832	3RD	279B	5.0H 5.0V	452			85.8	69.			

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