FCC MAIL SECTION

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May 6, 1992

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MAY - 8 1992

Federal Communications Commission
Office of the Secretary

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Petition for Rulemaking
WWLF-FM
Copenhagen, New York
Channel 294C3

Dear Ms. Searcy,

Enclosed please find an original and five (5) copies of a Petition for Rulemaking filed at my request, as permittee of WWLF-FM, Copenhagen, NY, to upgrade its facilities from Class A to Class C3.

If there are any questions, please do not hesitate to contact me or my engineering consultant, Craig Fox.

Sincerely,

Tia A. Soliday

Tia A. Soliday

Encs.

No. of Copies rec'd 0+5
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MAY - 8 1992

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	RM_____
Amendment of Section 73.202(b)	)	
Table of Allotments	)	MM Docket_____
FM Broadcast Stations	)	
Copenhagen, New York	)	
Channel 294C3	)	

To: The Commission

PETITION FOR RULEMAKING TO UPGRADE

Tia A. Soliday, permittee of WWLF-FM, Copenhagen, New York, pursuant to Section 1.401 of the Commission's Rules, respectfully requests the Commission to institute a rulemaking proceeding to upgrade WWLF-FM, from Channel 294A to 294C3.

Attached hereto and included as part of this proposal is an engineering discussion for Channel 294C3 using coordinates 7 miles northeast of Copenhagen. It is noted that this site restriction is needed to avoid a shortspacing with WPCX, Channel 295B, Auburn, NY.

If the requested petition is acted upon favorably, the permittee will promptly apply for the upgrade when instructed to do so by the Commission.

Respectfully submitted,

Tia A. Soliday

Tia A. Soliday
May 6, 1992

ENGINEERING DISCUSSION

WWLF, Copenhagen, New York, by its permittee, Tia A. Soliday, is proposing an upgrade from its Class A (3 kW) status on Channel 294 to that of a C3 on its same channel. The proposal meets all domestic spacing requirements with a site restriction 7 miles (11.3 km.) northeast of the reference coordinates for Copenhagen (See Exhibit 1) to avoid a shortspacing with WPCX, Channel 295B, Auburn, NY.

There are also two Canadian assignments which require study. One is an allotment for Channel 293A at Brockville, ON. Exhibit 2 shows that a limitation will have to placed on the WWLF proposed upgrade. Specifically, radiation at 330° True must be limited to approximately 4.0 kW @ 100 m. HAAT, or whatever value is deeemed appropriate to prevent the proposed .25 mv/m (50,10) interfering contour from overlappong the .5 mv/m (or greater along the border) protected contour of the Brockville allotment. The FM study in Exhibit 1 also reveals a slight shortspacing with respect to CKO1, Channel 295C1, at Ottawa, ON. However, there is only a 5.86 km. shortspacing proposed, and as a result, there would be no prohibitive overlap of the proposed .25 mv/m interfering contour with the .5 mv/m protected contour of CKO1, utilizing a full 25 kW ERP for Copenhagen.

Thus, WWLF will be able to employ an antenna with a single null having a depth of approximately -7.96 dB from the 25 kW maximum. (Exhibit 3)

In summary, this proposed upgrade will greatly enhance the service area of WWLF, and it is respectfully requested that this be proposed to Canada as a specially negotiated short-spaced allotment.

Respectfully submitted,

Craig L. Fox
Engineering Consultant
4853 Manor Hill Dr.
Syracuse, NY 13215-1336
315-468-0908

Dated: 5/6/92

Craig L. Fox
Engineering Consultant
Syracuse, New York
315-468-0908

FM Spacing study

May 6, 1992

Title: COPENHAGEN
Channel 294C3 (106.7 MHz)
Database: FCC 03/24/92

Latitude: 43-56-30
Longitude: 75-33-00
Safety zone: 60 km

Call City of License	Auth	Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
WYLR-FM	LIC	Normandy Broadcasting Co	240A	.24	43-18-17	115.5	161.5	12
Glens Falls		NY BLH-3822	95.9	280	73-45-07	296.7	149.5	CLEAR
ALLOC			241B1		43-12-18	176.0	82.04	14
Rome		NY DOC-87-23	96.1		75-28-48	356.1	68.04	CLEAR
CHEZ-FM			291C1	100	45-30-11	352.3	175.1	92
Ottawa		ON	106.1	291	75-51-02	172.1	83.14	CLEAR
ALLOC			292A		43-02-48	185.4	99.88	42
Oneida		NY	106.3		75-39-58	5.3	57.88	CLEAR
WMCR-FM	LIC	Warren Broadcasting Comp	292A	.39	43-02-48	185.4	99.88	42
Oneida		NY BLH-5612	106.3	219	75-39-58	5.3	57.88	CLEAR
ALLOC			293A		44-36-00	351.8	73.92	113
Brockville		ON	106.5		75-41-00	171.7	-39.1	SHORT
WPYX	LIC	Cap-Town Broadcasting, I	293B	15.5	42-38-09	138.7	191.9	145
Albany		NY BLH-870128KA	106.5	275	74-00-05	319.7	46.95	CLEAR
ALLOC			293B		42-38-09	138.7	191.9	145
Albany		NY	106.5		74-00-05	319.7	46.95	CLEAR
WWLF-FM	CP	Tia A. Soliday	294A	.20	43-52-47	243.2	15.27	142
Copenhagen		NY BPH-880721MB	106.7	374	75-43-11	63.1	-127	SHORT
ALLOC			294A		43-50-06	219.6	15.39	142
Copenhagen		NY DOC-87-500	106.7		75-40-20	39.5	-127	SHORT
Filing window 06/21-07/21/88 **CLOSED**								
ALLOC			294A		43-14-15	245.7	185.8	142
Irondequoit		NY DOC-84-231	106.7		77-38-12	64.3	43.79	CLEAR
Filing window 10/10-11/26/86 **CLOSED**								
WOSB	CP	Auburn Cablevision, Inc.	294A	3.50	43-11-27	244.1	186.9	142
Irondequoit		NY BMPH-900921ID	106.7	81	77-37-11	62.7	44.87	CLEAR
DOC-87-517								
ALLOC			294C2		44-18-40	76.6	189.2	177
Vergennes		VT	106.7		73-14-34	258.2	12.17	CLOSE
WIZN	LIC	Burlington, Broadcasters	294C2	50	44-18-40	76.6	189.2	177
Vergennes		VT BLH-870424KA	106.7	114	73-14-34	258.2	12.17	CLOSE
WPCX	LIC	Great Scott Broadcasting	295B	14	42-48-05	209.8	145.7	145
Auburn		NY BLH-880505KE	106.9	287	76-26-14	29.2	.669	CLOSE

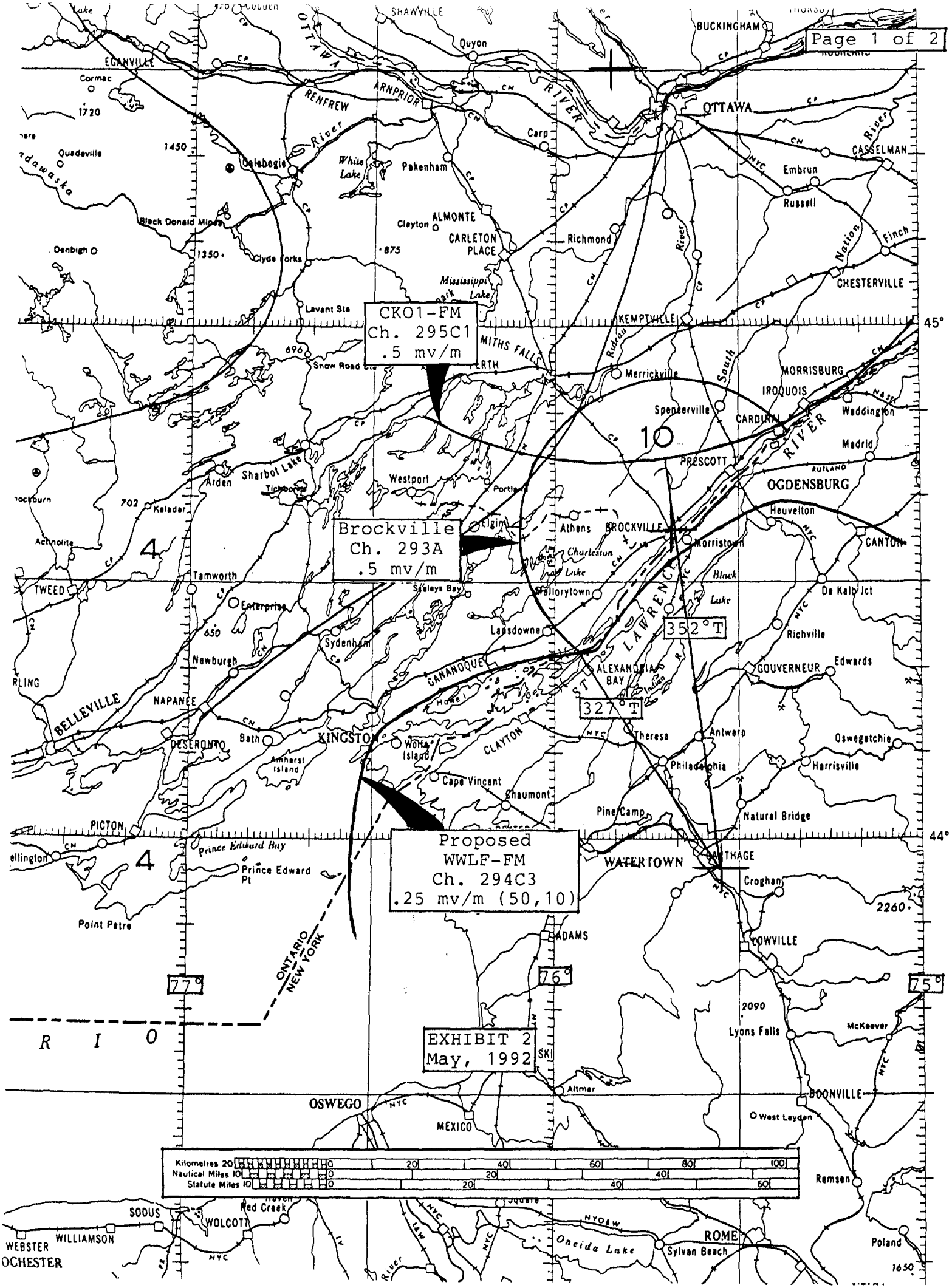
Craig L. Fox
Engineering Consultant
Syracuse, New York
315-468-0908
FM Spacing study

Title: COPENHAGEN
Channel 294C3 (106.7 MHz)

Latitude: 43-56-30
Longitude: 75-33-00

Call City of License	Auth	Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
ALLOC			295B		42-48-05	209.8	145.7	145
Auburn		NY	106.9		76-26-14	29.2	.669	CLOSE
CKO1			295C1	100	45-30-11	352.3	175.1	181
Ottawa		ON	106.9	291	75-51-02	172.1	-5.86	SHORT
WAYI-FM	LIC	Northway Broadcasting In	296A	.28	43-17-22	115.9	162.9	42
Hudson Falls		NY BMLH-790709AE	107.1	257	73-44-35	297.1	120.9	CLEAR
ALLOC			297B		43-08-40	161.1	93.60	71
Utica		NY	107.3		75-10-32	341.3	22.60	CLEAR
WRCK	LIC	H & D Media Limited Part	297B	50	43-08-40	161.1	93.60	71
Utica		NY BLH-801015AB	107.3	152	75-10-32	341.3	22.60	CLEAR

>> End of channel 294C3 study <<

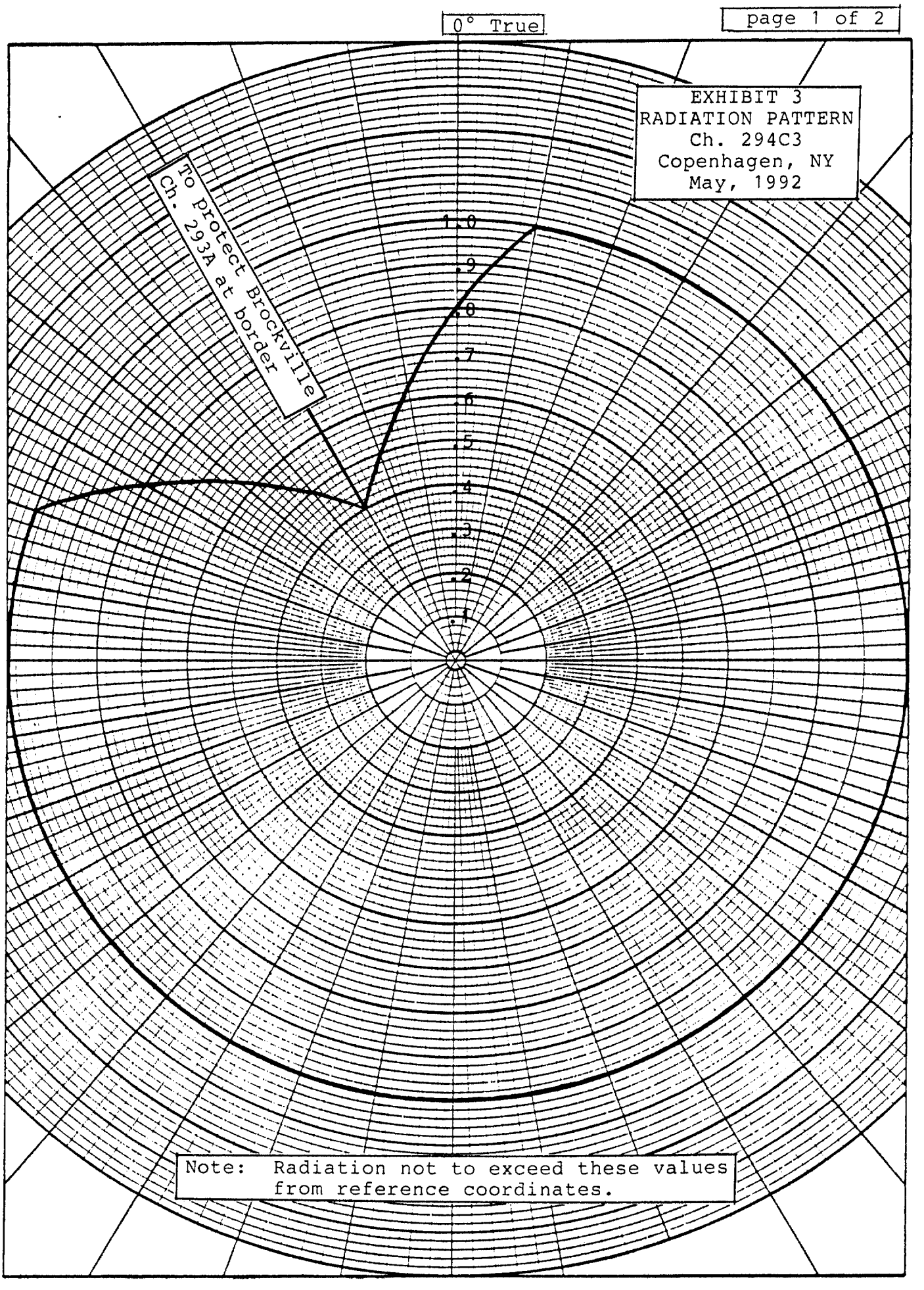

CKO1-FM
Ch. 295C1
.5 mv/m
Brockville
Ch. 293A
.5 mv/m
Proposed
WWLF-FM
Ch. 294C3
.25 mv/m (50,10)
352°T
327°T
EXHIBIT 2
May, 1992
OTTAWA
BUCKINGHAM
EGANVILLE
Quyon
Carp
Pakenham
ALMONTE
CARLETON PLACE
Richmond
CASSELMAN
Embrun
Russell
CHESTERVILLE
KEMPTVILLE
Merrickville
MORRISBURG
IROQUOIS
Waddington
Spencerville
CARDINAL
PRESCOTT
OGDENSBURG
Madrid
Heuvelton
CANTON
Morristown
BROCKVILLE
Athens
Elgin
Westport
Portland
Sharbot Lake
Arden
Tichborne
Kaladar
Tamworth
TWEED
Enterprise
Sydenham
Newburgh
NAPANEE
BELLEVILLE
DESERONTO
Bath
KINGSTON
Wolfe Island
Amherst Island
Cape Vincent
Chaumont
Lansdowne
Mallorytown
Charleston Lake
Black Lake
ALEXANDRIA BAY
GANANOQUE
CLAYTON
Theresa
Antwerp
Philadelphia
Pine Camp
Natural Bridge
GOUVERNEUR
Edwards
Richville
De Kalb Jct
Oswegatchie
Harrisville
WATERTOWN
CARTHAGE
Croghan
LOWVILLE
ADAMS
Lyons Falls
McKeever
BOONVILLE
West Leyden
Altmar
OSWEGO
MEXICO
Remsen
Poland
ROME
Sylvan Beach
Oneida Lake
PICTON
Prince Edward Bay
Prince Edward Pt
Point Petre
ONTARIO
NEW YORK
R I O
ST LAWRENCE RIVER
OTTAWA RIVER
Mississippi Lake
Black Donald Mines
Denbigh
Quadeville
Cormac
Calabogie
Clyde Forks
Lavant Sta
Snow Road Sta
Kilometres 20
Nautical Miles 10
Statute Miles 10
45°
44°
77°
76°
75°

Interference contours based on FCC F(50,10) curves

Title: COPENHAFGEN
Channel: 294

Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	48 dBu (.25 mV/m) contour
.0	100.0	15.92	73.3 km
	328.1	12.02	45.5 mi
* 10.0	100.0	25.00	80.2 km
	328.1	13.98	49.8 mi
* 290.0	100.0	25.00	80.2 km
	328.1	13.98	49.8 mi
* 300.0	100.0	15.92	73.3 km
	328.1	12.02	45.5 mi
* 310.0	100.0	10.05	66.5 km
	328.1	10.02	41.3 mi
* 320.0	100.0	6.339	60.3 km
	328.1	8.020	37.5 mi
* 330.0	100.0	3.999	54.8 km
	328.1	6.020	34.1 mi
* 340.0	100.0	6.339	60.3 km
	328.1	8.020	37.5 mi
* 350.0	100.0	10.05	66.5 km
	328.1	10.02	41.3 mi
HAAT:	100.0		
	328.1		

Note: Radial(s) denoted by "*" not included in HAAT calculation.



CITADEL® NO. 670 - POLAR CO-ORDINATE - 360 DEGREES

EXHIBIT 3
RADIATION PATTERN TABULATION
May, 1992

CITY: Copenhagen, NY

CHANNEL: 294C3

POWER: 25 kW ERP max.

DEGREES/T	FIELD	dBk	DEGREES/T	FIELD	dBk
0	.80	12.02	180	1.00	13.98
10	1.00	13.98	190		
20			200		
30			210		
40			220		
50			230		
60			240		
70			250		
80			260		
90			270		
100			280		
110			290		
120			300	.80	12.02
130			310	.63	10.02
140			320	.50	8.02
150			330	.40	6.02
160			340	.50	8.02
170			350	.63	10.02