

TABLE III - Page 3

**BEACON BROADCASTING CORPORATION
 AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
 NON-COMMERCIAL FM RADIO STATION
 ALLENTOWN, PENNSYLVANIA**

Channel 207A 0.125 kW (V) 245 Meters

CHANNEL 207a
 New Application, 891019MF
 ALLENTOWN, PENNSYLVANIA
 0.12 kW ERP/245 Meters EAH

40° 33' 54" N/75° 26' 26" W

<u>Bearing °True</u>	<u>EAH Meters</u>	<u>ERP (kw)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu 2/</u>	<u>40 dBu 3/</u>
All	245	0.12	17.0	54.5

Channel 207A, WRDV
 Apc,. BPED-880422MA
 Warminster, Pennsylvania
 0.10 kW ERP/35 m EAH

40° 12' 19" N/75° 06' 27" W

<u>Bearing °True</u>	<u>EAH Meters</u>	<u>ERP (kw)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu 2/</u>	<u>40 dBu 3/</u>
0	18.8	0.9	9.9	34.3
45	46.7	0.38	9.9	33.5
90	51.0	0.2	8.8	29.2
135	49.8	0.6	11.5	40.0
180	43.4	1.0	12.1	43.4
225	41.7	1.0	11.8	42.5
270	15.3	1.0	10.2	35.7
315	19.5	1.0	10.2	35.7

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Channel 207A, WRDV
 Apc,. BPED-880422MA
 Warminster, Pennsylvania
 0.2 kW ERP/27 m EAH
 40° 12' 19" N/75° 06' 27" W

<u>Bearing °True</u>	<u>EAH Meters</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu 1 /</u>	<u>40 dBu 3 /</u>
0	16.9	0.2	4.2	13.9
45	123.4	0.2	4.6	15.5
90	132.4	0.2	4.8	16.1
135	143.1	0.2	5.0	16.7
180	106.7	0.2	4.3	14.5
225	122.0	0.2	4.6	15.4
270	23.0	0.2	4.2	13.9
315	39.4	0.2	4.2	13.9

Channel 207A, WHHS
 Havertown, Pennsylvania
 0.004 kW/54 m EAH
 39° 59' 02" N/75° 17' 58" W

<u>Bearing °True</u>	<u>EAH Meters 1 /</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu 2 /</u>	<u>40 dBu 3 /</u>
All	54	0.004	3.41	10.85

Channel 206A, WXVU
 Villanova, Pennsylvania
 0.70 kW/68 m
 40° 03' 22" N/75° 22' 30" W

<u>Bearing °True</u>	<u>EAH Meters 1 /</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu 2 /</u>	<u>54 dBu 3 /</u>
All	68	0.70	13.73	20.48

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Channel 206A, WYBF
 Radnor Towns, PA
 0.70 kW/68 m
 40° 03' 22" N/75° 22' 30" W

<u>Bearing °True</u>	<u>EAH Meters</u> <u>1 /</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu</u> <u>2 /</u>	<u>54 dBu</u> <u>3 /</u>
All	68	0.70	13.73	20.48

Channel 205A
 WBYO Application, BPED-870514MN
 0.10 kW/133 m
 Sellersville, Pennsylvania
 40° 23' 02" N/75° 21' 02" W

<u>Bearing °True</u>	<u>EAH Meters</u> <u>1 /</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu</u> <u>2 /</u>	<u>80 dBu</u> <u>3 /</u>
All	133	0.1	11.8	3.58

Channel 209A, WDVR
 Delaware Town, NJ
 0.01 kW/92 m
 40° 30' 37" N/74° 57' 29"

<u>Bearing °True</u>	<u>EAH Meters</u> <u>1 /</u>	<u>ERP (kW)</u>	<u>Predicted Contours (km)</u>	
			<u>60 dBu</u> <u>2 /</u>	<u>80 dBu</u> <u>3 /</u>
All	92	0.01	4.68	1.57

TABLE IV

TV CHANNEL 6 INTERFERENCE STUDY

BEACON BROADCASTING CORPORATION
 AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
 NON-COMMERCIAL FM RADIO STATION
 ALLENTOWN, PENNSYLVANIA

Channel 207A 0.125 kW (V) 245 Meters

<u>Az</u>	<u>HAAT</u> <u>M.</u>	<u>ERP</u> <u>kW</u>	<u>EQ. ERP</u> <u>dBk</u>	<u>WPVI</u> <u>F(50,50)</u> <u>dBu</u>	<u>Prop</u> <u>F(50,10)</u> <u>dBu</u>	<u>Distance</u> <u>km</u>
0	269.3	.0159	-34.1	64	68.4	1.5
15	270.8	.0311	-31.1	64	68.4	2.12
30	272.3	.0634	-28.1	64	68.4	2.80
45	273.9	.124	-25.1	64	68.4	3.6
60	267.	.125	-25.1	64	68.4	3.6
75	260.1	.125	-25.1	64.5	68.6	3.50
90	253.2	.111	-25.6	65	68.8	3.30
105	245.6	.073	-27.4	65	68.8	2.83
120	237.9	.045	-29.5	65	68.8	2.32
135	230.3	.029	-31.4	65	68.8	1.93
150	219.2	.025	-32.0	65.5	70.1	1.62
165	208.2	.036	-30.5	65.5	70.1	1.8
180	197.1	.050	-29.0	65.5	70.1	2.07
195	190.5	.060	-28.2	65.5	70.1	2.4
210	183.9	.060	-28.2	65.5	70.1	2.4
225	177.3	.040	-30.0	65	68.8	2.09
240	209.2	.021	-33.0	64.7	68.7	1.61
255	241.1	.010	-36.0	64.5	68.6	1.22
270	273.0	.027	-38.8	64.5	68.6	0.88
285	276.9	.0046	-39.4	64.5	68.6	0.82
300	280.7	.0042	-39.8	64.5	68.6	0.79
315	284.6	.00400	-40.0	64.5	68.6	0.77
330	279.5	.00400	-40.0	64.5	68.6	0.77
345	274.9	.00798	-37.0	64.5	68.6	1.08

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TV CHANNEL 6 INTERFERENCE STUDY

BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
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ALLENTOWN, PENNSYLVANIA

Channel 207A 0.125 kW (V) 245 Meters

The population within the predicted area of interference is determined as follows:

<u>Census Tract</u>	<u>Total Tract Population</u>	<u>Within Interference Area Percent</u>	<u>Population</u>
6701	4833	0.4	19
6702	2647	58	1535
6903	4166	25	1041
180.02	4201	0.3	126
6904	5448	7	<u>381</u>
		Total	3102

JUNE 1992

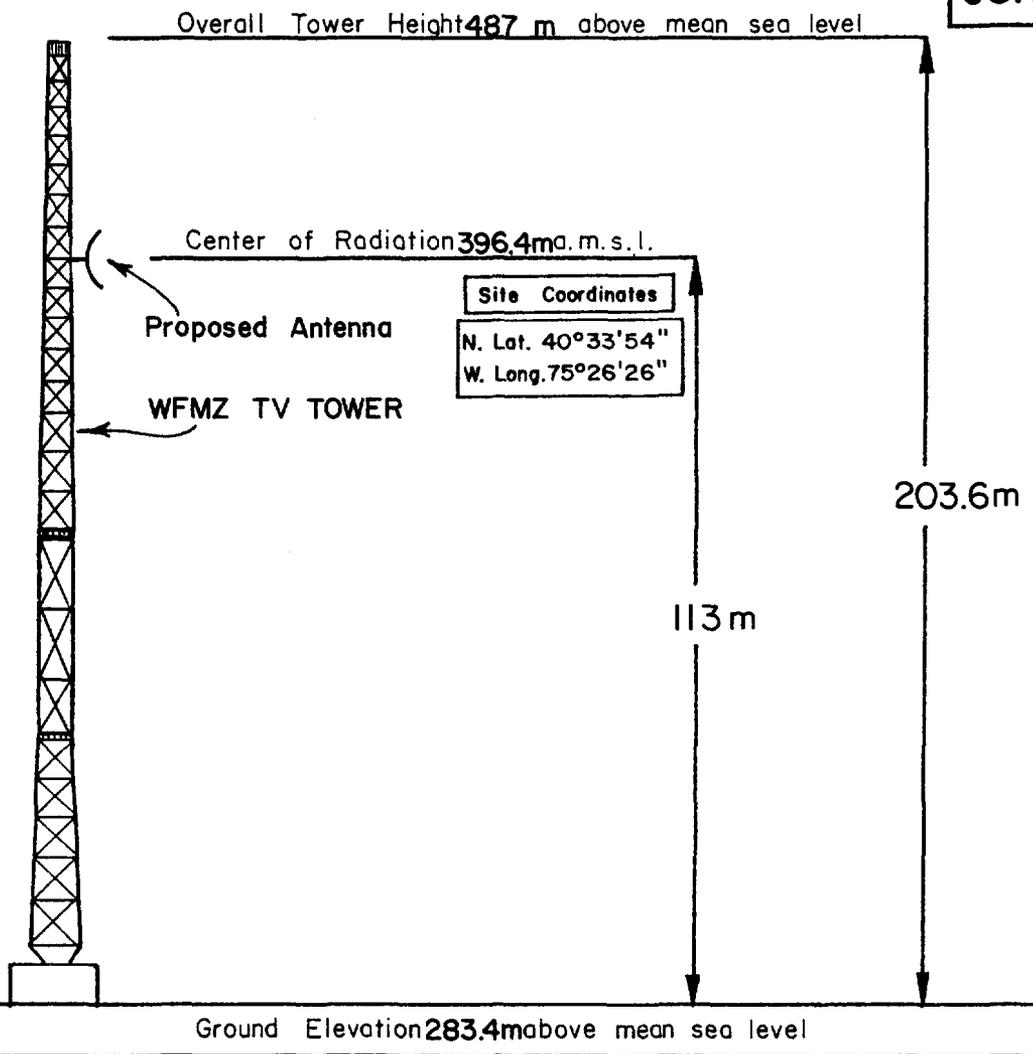


EXHIBIT VB-1

BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA

Channel 207A 0.125 kW (V) 245 Meters

LECHMAN & JOHNSON, INC.
TELECOMMUNICATIONS CONSULTANTS
14301 TRADE ZONE AVENUE, SUITE 108
UPPER MARLBORO, MD 20773
(301) 390-0900

EXHIBIT VB-2

INTERFERENCE STATEMENT

**BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA**

Channel 207A

0.125 kW (V)

245 Meters

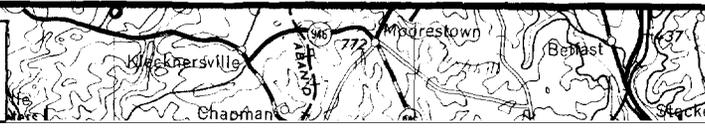
It is proposed to locate the FM Channel 203 operation on the WFMZ-TV, television Channel 69 tower. There are numerous communications services in the vicinity of the proposed operation. However, the proposed operation is not expected to have any adverse effect upon WFMZ-TV or WFMZ(FM). No interference is expected to any of the other communications facilities located in the general vicinity primarily because of the relatively low ERP. The applicant will address all complaints of alleged interference within its blanketing contour as established by Section 73.318 of the Rules and resolve such complaints satisfactory to the complainant provided a device that is malfunctioning is not included in this statement. The applicant's telecommunications consultant is not aware of any cable headend facilities within the blanketing contour. The proposed operation is not expected to cause receiver-induced intermodulation interference within 10 km of the proposed site.

Should interference occur due to the direct results of the construction of this FM facility, the licensee will take the necessary steps to correct the interference and resolve the issue of interference.

Beacon understands its responsibility to effectively install at least 102 filters in the case of interference to WPVI-TV service. As pointed out in the prior applications, it is believed that off the air viewing of WPVI-TV is limited in this area and wide spread interference is not expected to be a problem. In any event, correcting interference to WPVI-TV may be readily accomplished by the applicant.

Area : 494 sq. km.

Pop. : 286,093 persons



JUNE 1992

JUNE 1992

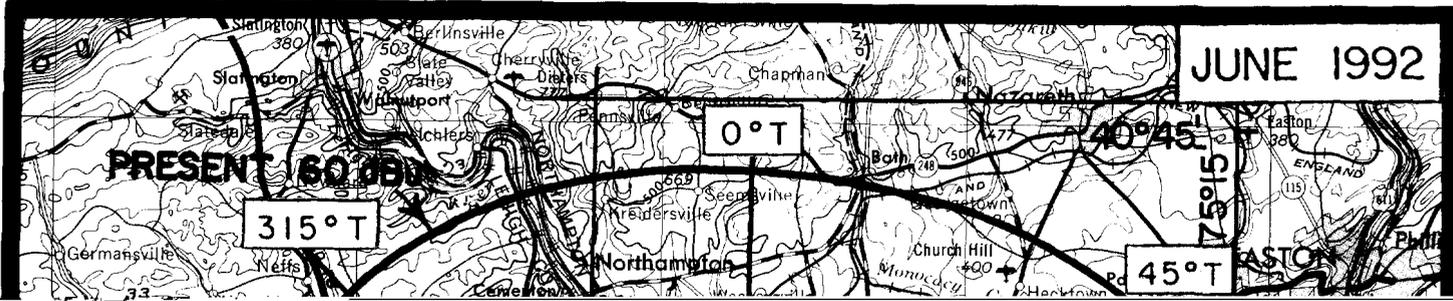
PRESENT / 60 JBL

315° T

0° T

40° 45'

45° T



JUNE 1992

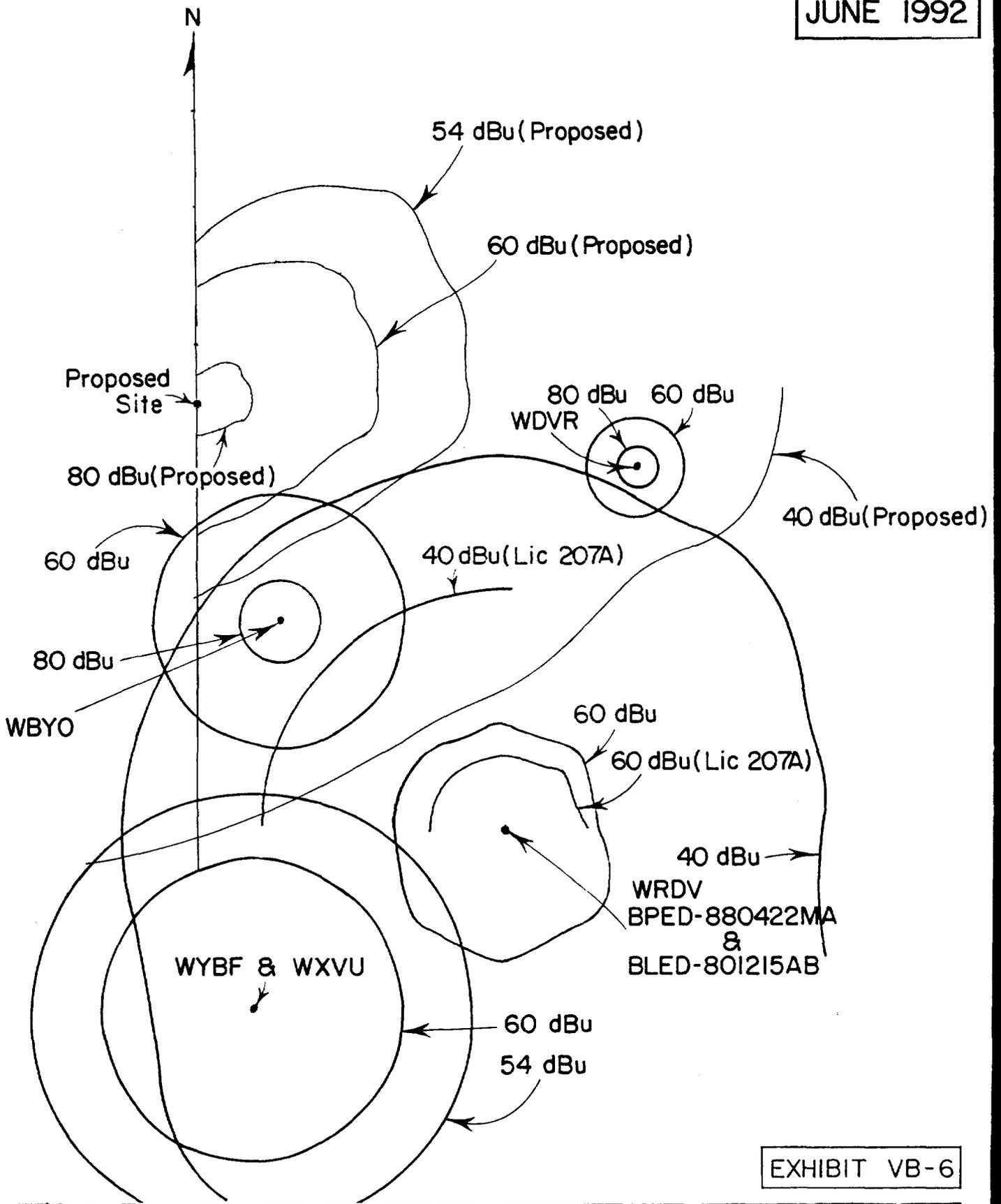


EXHIBIT VB-6

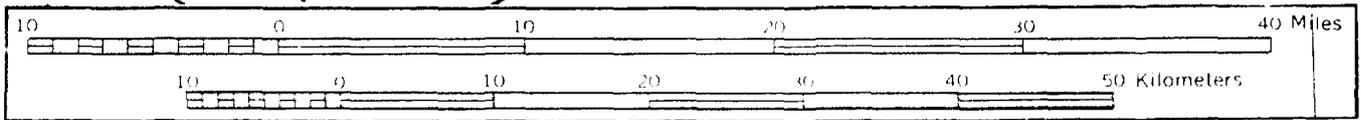


EXHIBIT VB-7

DIRECTIONAL ANTENNA INFORMATION

**BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA**

Channel 207A 0.125 kW (V) 245 Meters

It is proposed to install a directional antenna on an existing tower. An envelope design is proposed such that the radiated fields would not cause predicted objectional interference to other facilities. The suppression of the proposed directional antenna is within the ratio of maximum to minimum radiation in the horizontal plane of 15 decibels as required by Section 73.510(b) of the Rules. The horizontal pattern does not exceed a variation of 2 dB per 10° of azimuth. If the applicant is successful in obtaining a construction permit for these facilities, the proposed directional antenna system envelope will be submitted to various antenna manufacturers to design a pattern that fits within that envelope. All appropriate patterns will be submitted to the Commission when the license application is filed with the FCC. Should the Commission require such information prior to licensing, the applicant hereby requests a waiver of the Rules whereby such waiver is supported by the above statement.

Exhibit VB-7, Page 4, is a tabulation of the relative fields for the proposed directional antenna system with the ERP expressed in dBk and kW. Exhibits VB-7, Page 2, and VB-7, Page 3, are polar plots of the horizontal plane pattern in relative field and dBk, respectively.

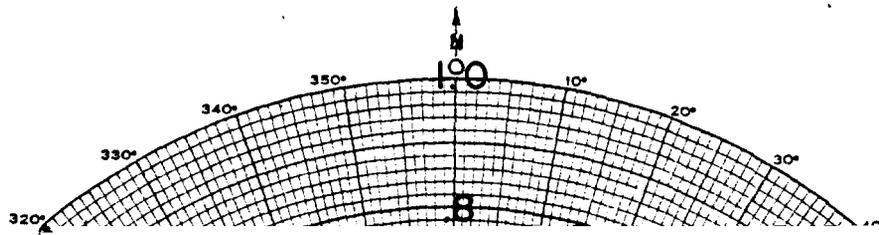
DIRECTIONAL ANTENNA INFORMATION

BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA

Channel 207A 0.125 kW (Max) DA 245 Meters

<u>Azimuth</u>	<u>Rel.Fld.</u>	<u>dB</u>	<u>dBk</u>	<u>kW</u>
0	0.357	-8.95	-17.98	0.0159
10	0.449	-6.95	-15.98	0.0252
20	0.566	-4.95	-13.98	0.0400
30	0.712	-2.95	-11.98	0.0634
40	0.896	-0.95	-9.98	0.100
45	0.995	-0.04	-9.07	0.124
50	1.000	0.00	-9.03	0.125
60	1.000	0.00	-9.03	0.125
70	1.000	0.00	-9.03	0.125
80	1.000	0.00	-9.03	0.125
90	0.941	-0.53	-9.56	0.111
100	0.826	-1.66	-10.69	0.085
110	0.697	-3.14	-12.17	0.0610
120	0.598	-4.47	-13.50	0.045
130	0.528	-5.55	-14.58	0.035
135	0.481	-6.35	-15.38	0.29
140	0.448	-6.97	-16.00	0.025
150	0.448	-6.97	-16.00	0.025
160	0.490	-6.19	-15.22	0.0300
170	0.551	-5.17	-14.20	0.0380
180	0.633	-3.97	-13.00	0.050
190	0.689	-3.24	-12.27	0.0593
200	0.693	-3.19	-12.22	0.0600
210	0.693	-3.19	-12.22	0.0600
220	0.633	-3.97	-13.00	0.0501
225	0.566	-4.95	-23.98	0.0400
230	0.515	-5.75	-14.78	0.0333
240	0.410	-7.75	-16.78	0.0210
250	0.325	-9.75	-18.78	0.0132
260	0.259	-11.75	-20.78	0.00836
270	0.205	-13.75	-22.78	0.00527
280	0.197	-14.13	-23.16	0.00482
290	0.190	-14.43	-23.46	0.00451
300	0.183	-14.75	-23.78	0.00420
310	0.179	-14.95	-23.98	0.00400
315	0.179	-14.95	-23.98	0.00400
320	0.179	-14.95	-23.98	0.00400
330	0.179	-14.95	-23.98	0.00400
340	0.225	-12.95	-21.98	0.00634
350	0.283	-10.95	-19.98	0.0100

RELATIVE FIELD PATTERN



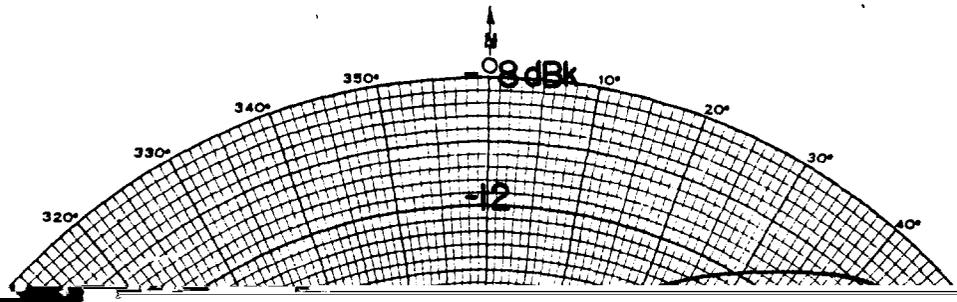


EXHIBIT VB-8

RADIOFREQUENCY RADIATION STUDY

**BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA**

Channel 207A 0.125 kW (V) 245 Meters

The following calculations are performed in order to determine, whether the proposed FM station has a significant environmental effect. The calculations to determine power densities (mW/cm^2) and power density levels of all TV and FM facilities are computed by using the following equation:

$$\text{Power density in } \text{mW}/\text{cm}^2 \text{ (S)} = \frac{(33.4)(F^2)[(.4)(\text{Visual ERP}) + \text{Aural ERP}]}{(\text{Distance from Center of Radiation})^2}$$

In the above equation, ERP is the total power of horizontal and vertical polarization in kilowatts, distance to a location is in meters and F is the relative field strength towards the location from the vertical plane pattern. For the proposed FM facility, the total ERP is 0.125 kW and the center of radiation is 113 meters above ground. At a depression angle of 90 degrees F is assumed to be 1.0, that is the "worst case" assumption. Therefore, maximum power density for the proposed FM facility at the base of the tower is $0.000333 \text{ mW}/\text{cm}^2$ or 0.03 percent of the FM permitted maximum. For television station WFMZ-TV "worst case" power density near the tower base, F is 1.0 and aural power is 22 percent of visual. Therefore worst case WVTM-TV power density is $0.92 \text{ mW}/\text{cm}^2$. This 34.3 percent of the maximum permitted for operation on channel 69 ($2.68 \text{ mW}/\text{cm}^2$). In the case of station WFMZ(FM) the calculated power density for "worst case", $F = 1$, is $0.065 \text{ mW}/\text{cm}^2$ or 6.5 percent of the FM maximum.

Therefore, the total calculated "worst case" power density at the base of the tower is less than 41 percent of the permitted maximum. Thus, the proposal is in compliance with OST Bulletin No. 65 and the ANSI Standards.

To assure that personnel working on the tower is not excessively exposed, the applicant will reduce power or turn the transmitter off, as necessary, to make sure that such persons will not be exposed to excessive levels of Radiofrequency Radiation.

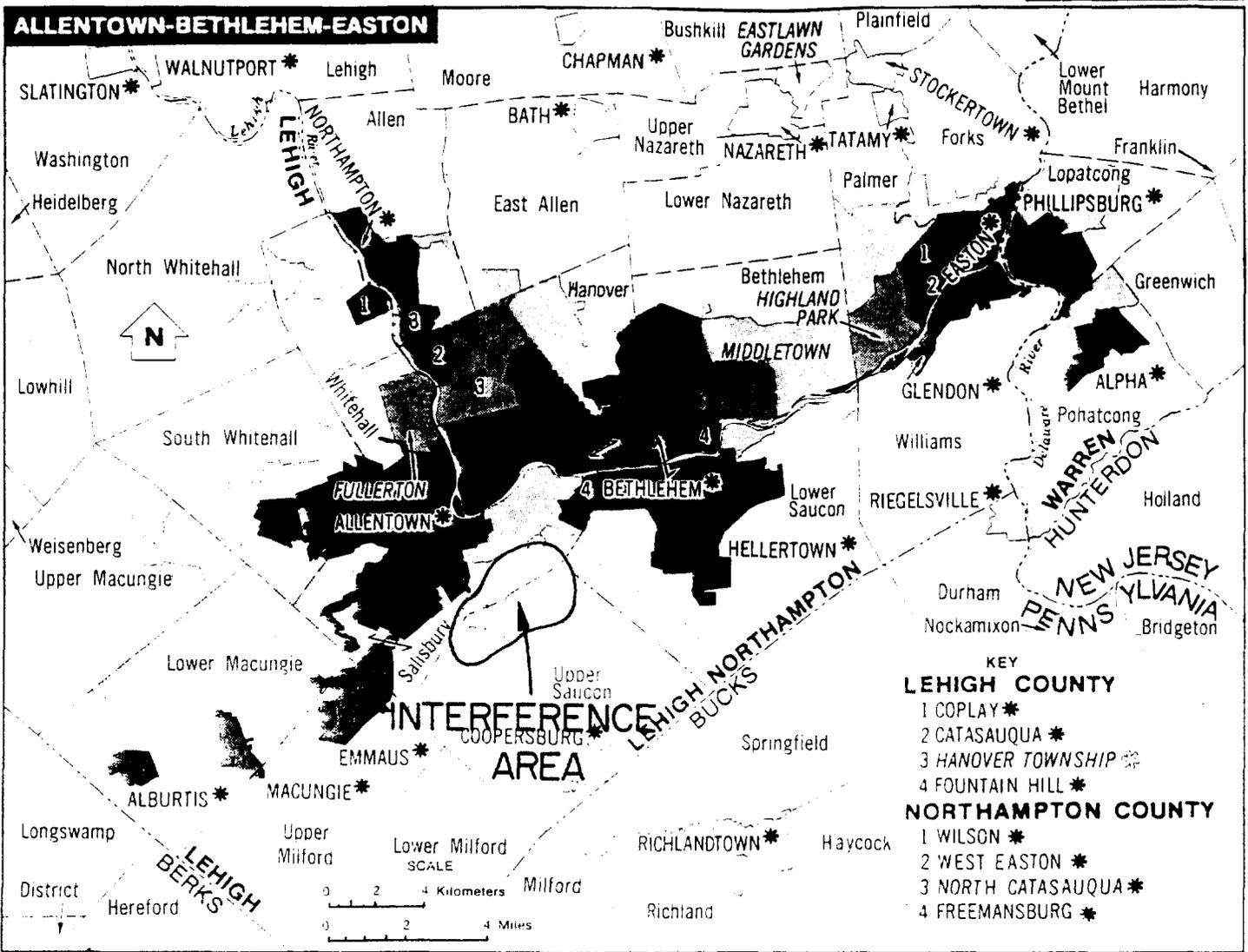


EXHIBIT VB- 9

BEACON BROADCASTING CORPORATION
AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT (BPED-900905ML)
NON-COMMERCIAL FM RADIO STATION
ALLENTOWN, PENNSYLVANIA

Channel 207A 0.125 kW (V) 245 Meters

LECHMAN & JOHNSON, INC.
 TELECOMMUNICATIONS CONSULTANTS
 16801 TRADE ZONE AVENUE, SUITE 108
 UPPER MARLBORO, MD 20778
 (301) 390-0900

DECLARATION

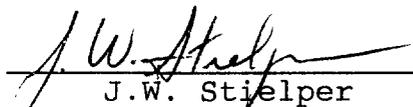
ENGINEERING STATEMENT
PREPARED FOR
BEACON BROADCASTING CORPORATION INC.
ALLENTOWN, PENNSYLVANIA

The firm of Lechman and Johnson, Inc. has been retained by Beacon Broadcasting Corporation Inc. ("Beacon"), applicant for a new non commercial FM station at Allentown, Pennsylvania (File No. BPED-900905KL), to make engineering studies of the informal objection on May 27, 1992, filed by Capital Cities/ABC, Inc. ("ABC") licensee of station WPVI-TV Channel 6, Philadelphia Pennsylvania. Beacon proposes operation on channel 207A at a site within the predicted coverage area of station WPVI-TV. The predicted WPVI-TV Grade B contour extends approximately 102.0 kilometers from WPVI-TV toward the proposed Beacon transmitting site. The Beacon site is 60.3 kilometers from WPVI-TV, not 97 kilometers as stated in the ABC Engineering Statement. In any event, there is potential for interference to WPVI-TV service from the proposed Beacon operation on Channel 207A.

In the original application Beacon used a series of terrain profiles to show that there is rough terrain between the WPVI-TV site and the proposed Beacon site that would affect WPVI-TV coverage of the area. The ABC objection includes an engineering statement which contained calculations of predicted interference to WPVI-TV service that ignored this terrain. ABC used the method of the Commission's rules which includes the propagation curves that are intended to reflect "average terrain" situations. To resolve this conflict, Beacon is amending its application to specify facilities that comply with the Channel 6 interference provisions when the method of the Rules appropriate for average terrain is used to predict interference.

In summary, the ABC informal objections do not apply to the proposed Beacon operation as amended by the application dated June 30, 1992.

I declare under penalty of perjury, the forgoing facts and information is true to the best of my knowledge.



J.W. Stielper
Telecommunications Consultant
June 30, 1992