

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

AUG 30 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In re Applications of)	MM Docket 94-88
)	
)	
COMMUNITY EDUCATIONAL ASSOCIATION)	File No. BPED-930316MF
Holly Hill, Florida)	
)	
)	
CORNERSTONE COMMUNITY RADIO, INC.)	File No. BPED-930618MG
Flagler Beach, Florida)	
)	
)	
For a Construction Permit for a)	
New Noncommercial Educational FM)	
Station on Channel 212A)	

To: Honorable Joseph Chachkin
Administrative Law Judge

PETITION FOR LEAVE TO AMEND

Community Educational Association ("CEA") by its counsel and pursuant to § 73.3522(b) of the Commission's Rules, offers a post-designation engineering amendment to its application as a matter of right and requests acceptance of the amendment which will remove the conflict between the captioned mutually exclusive applications.

1. After determining the application of CEA was mutually exclusive with the application of Cornerstone Community Radio, Inc. ("CCR") the Chief, Audio Services Division released a Hearing Designation Order, DA 94-789, on August 2, 1994, (the "HDO") designating the two applications for hearing. CEA commissioned an engineering study to determine whether there was a way to resolve

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the conflict between the two applications through an engineering amendment and avoid a comparative hearing.

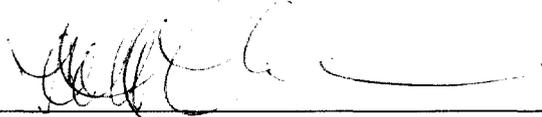
2. The engineering study produced a solution to the conflict between the competing applications, which is set forth in the proffered amendment. The amendment calls for CEA to construct at a new site and change its proposal from Channel 212A to Channel 201A, while retaining the same community of license. CEA's amended application will provide service to approximately 26,000 more people than its original proposal.

3. Section 73.3522(b) of the Commission's Rules allows applicants to file amendments relating to issues first raised in a hearing designation order as a matter of right within 30 days of the release of the order. 47 C.F.R. § 73.3522(b). CEA is filing its engineering amendment contemporaneously under separate cover, and requests its acceptance as a matter of right, as it is proffered less than 30 days from release of the HDO, and will resolve the conflict between the two applications first raised in the HDO. ¹

¹ The applicants have not entered into any type of settlement agreement. CEA has not been reimbursed for any of its prosecution costs or the costs it incurred in preparing and filing the proffered amendment. Therefore, the applicants do not plan to produce any of the documentation required by § 73.3525 of the Rules. 47 C.F.R. § 73.3525.

4. Upon acceptance of CEA's amendment, the Presiding Judge may grant the CCR application and consider grant of the CEA application pending its presentation on the issues specified against it. ²

Respectfully submitted,
COMMUNITY EDUCATIONAL ASSOCIATION



Scott C. Cinnamon
Its Counsel

BROWN NIETERT & KAUFMAN
1920 N Street, N.W.
Suite 660
Washington, D.C. 20036

(202) 887-0600

August 30, 1994

² With respect to the CEA application, there are two issues which will need to be resolved prior to grant, specifically the air hazard issue and the issue concerning CEA's qualifications to be a reserved band license holder. CEA plans to seek summary decision on both of those issues by way of separate amendments as soon as possible.

RECEIVED

AUG 30 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMUNITY EDUCATIONAL ASSOCIATION
P.O. Box 847
Mayaguez, P.R. 00681

August 25, 1994

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 200554

Re: Application of Community Educational
Association for New Non-Commercial
Educational FM Station at Holly Hill, FL
BPED-930316MF
Amendment

Dear Sir/Madam:

I, Jose Mercado, President of applicant Community Educational Association, wish to amend our pending application for a new non-commercial educational FM Station to serve Holly Hill, Florida, to incorporate the engineering proposal attached hereto.

Sincerely Yours,



Jose Mercado, President
Community Educational Association

Section V-B - FM BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ ASB Referral Date _____ Referred by _____
--	--

Name of Applicant

Community Educational Association

Call letters <i>(if issued)</i> <p style="text-align: center;">New</p>	Is this application being filed in response to a window? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, specify closing date: _____
---	---

Purpose of Application: *(check appropriate box(es))* Amend BPED-930316MF

- | | |
|--|---|
| <input type="checkbox"/> Construct a new (main) facility | <input type="checkbox"/> Construct a new auxiliary facility |
| <input type="checkbox"/> Modify existing construction permit for main facility | <input type="checkbox"/> Modify existing construction permit for auxiliary facility |
| <input type="checkbox"/> Modify licensed main facility | <input type="checkbox"/> Modify licensed auxiliary facility |

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Antenna supporting-structure height | <input type="checkbox"/> Effective radiated power |
| <input checked="" type="checkbox"/> Antenna height above average terrain | <input checked="" type="checkbox"/> Frequency |
| <input checked="" type="checkbox"/> Antenna location | <input type="checkbox"/> Class |
| <input type="checkbox"/> Main Studio location | <input type="checkbox"/> Other <i>(Summarize briefly)</i> |

File Number(s) Amend BPED-930316MF

1. Allocation:

Channel No.	Principal community to be served:			Class <i>(check only one box below)</i>				
	City	County	State	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B1	<input type="checkbox"/> B	<input type="checkbox"/> C3	
201	Holly Hill	Volusia	FL	<input type="checkbox"/> C2	<input type="checkbox"/> C1	<input type="checkbox"/> C	<input type="checkbox"/> D	

2. Exact location of antenna.

- (a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.
 7.6 kilometers west-northwest of intersection of Interstate 95 and State Route 40 on north side of Route 40, rural Flagler County, Florida
- (b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude 29 16 44	Longitude 81 11 25
----------------------------------	-----------------------------------

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? Yes No

If Yes, give call letter(s) or file number(s) or both. N/A

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any. N/A

4. Does the application propose to correct previous site coordinates?
If Yes, list old coordinates.

Yes No

Latitude ° ' "	Longitude ° ' "
---	--

5. Has the FAA been notified of the proposed construction?
If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Yes No

Date August 24, 1994 Office where filed Southern Region
Atlanta, Georgia

Exhibit No. <u>1</u>

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

Landing Area	Distance (km)	Bearing (degrees True)
(a) <u>Dan Rice (Pvt)</u>	<u>3.3</u>	<u>200.0 degrees</u>
(a) <u>Big "G" (Pvt)</u>	<u>4.1</u>	<u>251.7 degrees</u>
<u>Cross Creek (Pvt)</u>	<u>5.4</u>	<u>215.4 degrees</u>
(b) <u>Ormond Beach Municipal</u>	<u>7.8</u>	<u>71.7 degrees</u>

7. (a) Elevation: *(to the nearest meter)*

- (1) of site above mean sea level; 8 meters
- (2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 59 meters
- (3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] 67 meters

(b) Height of radiation center: *(to the nearest meter)* H = Horizontal; V = Vertical

- (1) above ground 56 meters (H)
- 56 meters (V)
- (2) above mean sea level [(aX1) + (bX1)] 64 meters (H)
- 64 meters (V)
- (3) above average terrain 58 meters (H)
- 58 meters (V)

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(bX3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of FM radiator.

Exhibit No. <u>2</u>

9. Effective Radiated Power:

(a) ERP in the horizontal plane 0.0 kw (HM) 2.0 kw (VM)

(b) Is beam tilt proposed? Yes No

If Yes, specify maximum ERP in the plane of the tilted beam, and attach as an Exhibit a vertical elevational plot of radiated field.

Exhibit No. <u>N/A</u>

_____ kw (HM) _____ kw (VM)

*Polarization

10. Is a directional antenna proposed?

Yes No

If Yes, attach as an Exhibit a statement with all data specified in 47 C.F.R. Section 73.316, including plot(s) and tabulations of horizontally and vertically polarized radiated components in terms of relative field.

Exhibit No.
3

11. Will the main studio be located within the 70 dBu or 3.16 mV/m contour?

Yes No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.
N/A

12. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters, or any nonbroadcast (except citizens band or amateur) radio stations; or (b) within the blanketing contour, any established commercial or government receiving stations, cable head-end facilities, or populated areas; or (c) within ten (10) kilometers of the proposed antenna, any proposed or authorized FM or TV transmitters which may produce receiver-induced intermodulation interference?

Yes No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by receiver-induced or other types of modulation) to facilities in existence or authorized or to radio receivers in use prior to grant of this application. (See 47 C.F.R. Sections 73.315(b), 73.316(d) and 73.318.)

Exhibit No.
4

13. Attach as an Exhibit a 7.5 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction D for Section V. Further, the map must clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
5

14. Attach as an Exhibit (name the source) a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
6

- (a) the proposed transmitter location, and the radials along with profile graphs have been prepared;
- (b) the 1 mV/m predicted contour and, for noncommercial educational applicants applying on a commercial channel, the 3.16 mV/m contour; and
- (c) the legal boundaries of the principal community to be served.

15. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km) and population (latest census) within the predicted 1 mV/m contour.

Area 610.4* sq. km. Population 77,470 1990 Census (PL 94-171 files
*Land area only

16. Attach as an Exhibit a map (Sectional Aeronautical charts where obtainable) showing the present and proposed 1 mV/m (60 dbu) contours.

Exhibit No.
N/A

Enter the following from Exhibit above: Gain Area N/A sq. mi.
Loss Area N/A sq. mi.

Percent change (gain area plus loss area as percentage of present area) N/A %.
If 50% or more this constitutes a major change. Indicate in question 2(c), Section I, accordingly.

Exhibit No.
N/A

17. For an application involving an auxiliary facility only, attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license. See 47 C.F.R. Section 73.1675. (File No.: _____)

18. Terrain and coverage data (to be calculated in accordance with 47 C.F.R. Section 73.313).

Source of terrain data: (check only one box below)

Linearly interpolated 30-second database 7.5 minute topographic map

(Source: NGDC)

Other (briefly summarize)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances to the 1 mV/m contour (kilometers)
0	57.9	16.7
45	60.4	17.1
90	62.2	17.4
135	57.9	13.2
180	54.4	9.7
225	54.4	9.4
270	57.9	13.4
315	59.0	16.8

Allocation Studies

(See Subpart C of 47 C.F.R. Part 73)

19. Is the proposed antenna location within 320 kilometers (199 miles) of the common border between the United States and Mexico?

Yes No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.

Exhibit No.
N/A

20. Is the proposed antenna location within 320 kilometers of the common border between the United States and Canada?

Yes No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Working Agreement for Allocation of FM Broadcasting Stations on Channels 201-300 under The Canada-United States FM Agreement of 1947.

Exhibit No.
N/A

21. If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as an Exhibit a complete allocation study to establish the lack of prohibited overlap of contours with other U.S. stations. The allocation study should include the following:

Exhibit No.
7

- (a) The normally protected interference-free and the interfering contours for the proposed operation along all azimuths.
- (b) Complete normally protected interference-free contours of all other proposals and existing stations to which objectionable interference would be caused.
- (c) Interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.
- (d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing stations, which require study to show the absence of objectionable interference.
- (e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers and operating or proposed facilities.
- (f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.
- (g) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire Exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (h) The name of the map(s) used in the Exhibit(s).

22. With regard to any stations separated by 53 or 54 channels (10.6 or 10.8 MHz) attach as an Exhibit information required in 1/ (*separation requirements involving intermediate frequency (i.f.) interference*).

Exhibit No.
8

23.(a) Is the proposed operation on Channel 218, 219, or 220?

Yes No

(b) If the answer to (a) is yes, does the proposed operation satisfy the requirements of 47 C.F.R. Section 73.207?

Yes No

(c) If the answer to (b) is yes, attach as an Exhibit information required in 1/ regarding separation requirements with respect to stations on Channels 221, 222 and 223.

Exhibit No.
N/A

(d) If the answer to (b) is no, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose.

Exhibit No.
N/A

1/ A showing that the proposed operation meets the minimum distance separation requirements. Include existing stations, proposed stations, and cities which appear in the Table of Allotments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 6)

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following:

Exhibit No.
N/A

- (1) Protected and interfering contours, in all directions (360), for the proposed operation.
- (2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as transmitter location.
- (3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.
- (4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (5) The official title(s) of the map(s) used in the exhibits(s).

24. Is the proposed station for a channel in the range from Channel 201 to 220 (88.1 through 91.9 MHz) and the proposed antenna location within the distance to an affected TV Channel 6 station(s) as defined in 47 C.F.R. Section 73.525?

Yes No

If Yes, attach as an Exhibit either a TV Channel 6 agreement letter dated and signed by both parties or a map and an engineering statement with calculations demonstrating compliance with 47 C.F.R. Section 73.525 for each affected TV Channel 6 station.

Exhibit No.
9

25. Is the proposed station for a channel in the range from Channel 221 to 300 (92.1-107.9 MHz)?

Yes No

If Yes, attach as an Exhibit information required in 1/. (Except for Class D (secondary) proposals.)

Exhibit No.
N/A

26. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact?

Yes No

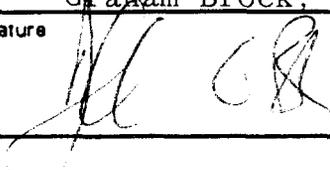
If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311.

Exhibit No.
N/A

If No, explain briefly why not. This application is categorically excluded from environmental processing under the provisions of Section 1.1306 of the Commission's rules. See Exhibit #10 for Radiofrequency Radiation Compliance.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) Jefferson G. Brock Graham Brock, Inc.	Relationship to Applicant (e.g., Consulting Engineer) Technical Consultant
Signature 	Address (Include ZIP Code) 10 Sylvan Drive, #26 P.O. Box 24466 St. Simons Island, GA 31522
Date August 24, 1994	Telephone No. (Include Area Code) (912) 638-8028

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AMEND BPED-930316MF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NONCOMMERCIAL STATION
CH 201A - 88.1 MHZ - 2.0 KW
HOLLY HILL, FLORIDA
August 1994

TECHNICAL EXHIBIT

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AMEND BPED-930316MF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NONCOMMERCIAL STATION
CH 201A - 88.1 MHZ - 2.0 KW
HOLLY HILL, FLORIDA
August 1994

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Community Educational Association ("CEA"), an applicant for a new noncommercial station at Holly Hill, Florida. This instant application amends BPED-930316MF. The amendment proposes to change the requested channel (from Channel 212A to Channel 201A), relocate the proposed facility, change the antenna supporting structure height and antenna height above average terrain of the proposed facility. These changes are to remove the mutual exclusivity between the CEA application at Holly Hill and the proposed Cornerstone Community Radio application for Channel 212A at Flagler Beach, Florida (BPED-930618MG).

Since CEA is proposing a new tower for its proposed Holly Hill facility, the Federal Aviation Administration has been apprised of the requested tower (see Exhibit #1). All of the exhibits required in FCC Form 340 are attached hereto, including a full-scale copy of a portion of the Favoretta, Florida, 7.5 minute topographic map on which the proposed site is located (Exhibit #5). In addition, an original Favoretta Quadrangle map is attached to the original Holly Hill application only as Exhibit #5A.

COMMUNITY EDUCATIONAL ASSOCIATION

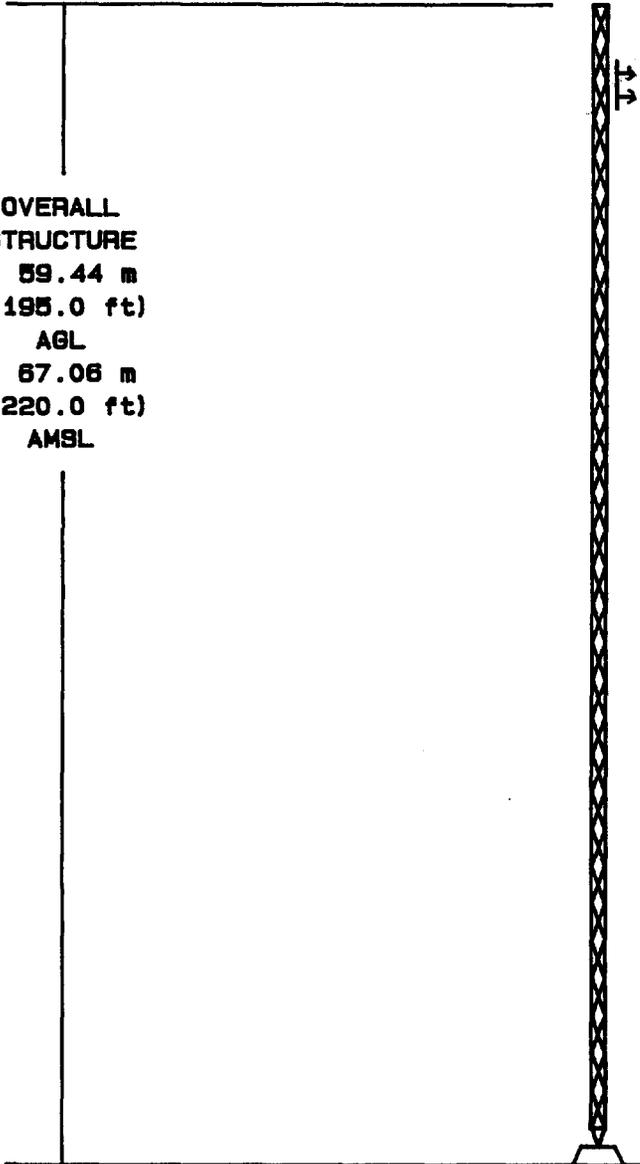
Proposed Radio Tower: 88.1 MHz
 2.0 kilowatts ERP
 2 bay vertical antenna

Site Location: 4.7 statute miles west-northwest of
 intersection of Interstate 95 and State Route
 40, on north side of Route 40, rural Flagler
 County, Florida

NAD 1983 Coordinates (NADCON):

North Latitude 29° 16' 44.926"
West Longitude 81° 11' 24.216"

OVERALL
STRUCTURE
59.44 m
(195.0 ft)
AGL
67.06 m
(220.0 ft)
AMSL



PROPOSED FM Antenna
Center of Radiation
56.38 m (185.0 ft) AGL
64.00 m (210.0 ft) AMSL
58.00 m (190.3 ft) HAAT

North Latitude 29-16-44 Site Elev 7.62 m (25.0 ft) AMSL
West Longitude 81-11-25 Terrain Avg 6.00 m (19.7 ft) AMSL
(Sketch not drawn to scale)

VERTICAL PLAN SKETCH

SITE ELEVATION - 8 m (25 ft) AMSL
TOP OF STRUCTURE - 59 m (195 ft) AGL
67 m (220 ft) AMSL
FM Antenna COR - 56 m (185 ft) AGL
64 m (210 ft) AMSL
58 m (190 ft) HAAT

FIGURES ROUNDED TO NEAREST METER (FOOT) .

EXHIBIT #2

AMEND BPED-930316MF
COMM. EDUCATIONAL ASSOC.
NONCOMMERCIAL FM STATION
CH 201A - 2.0 KW (V)
HOLLY HILL, FLORIDA
August 1984

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AMEND BPED-930316MF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NONCOMMERCIAL STATION
CH 201A - 88.1 MHZ - 2.0 KW
HOLLY HILL, FLORIDA
August 1994

EXHIBIT #3

Directional Antenna System (\$73.316 Compliance)

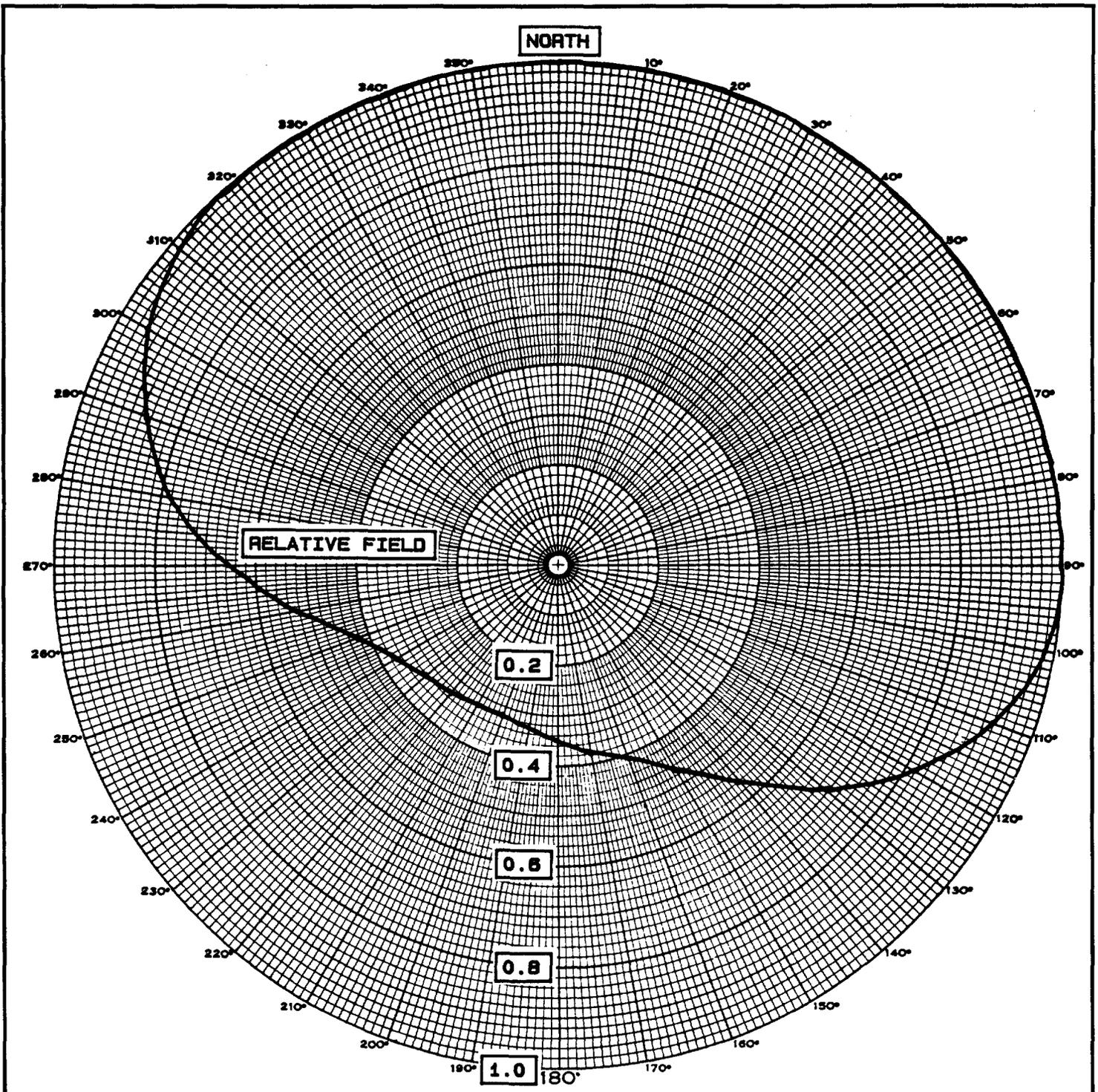
This application at Holly Hill, Florida, is proposing to use a directional FM antenna system to achieve the required amount of protection to several other FM facilities as detailed in Exhibit #7.

The proposed antenna is manufactured by Electronics Research, Inc. ("ERI") located in Chandler, Indiana. The antenna is a vertically polarized two bay radiator, Model #P-300-2. The antenna is to be mounted on the proposed tower structure in accordance with the antenna manufacturer's specifications. An envelope pattern of the proposed system was developed from an actual measured pattern. This pattern was used in the preparation of all the Community Educational Association contours. The actual measured pattern, as submitted with the FCC Form 302-FM (Application for Station License), will come as close as possible to the envelope pattern attached hereto without exceeding the limits of the pattern on any azimuth.

Exhibit #3A is a relative field horizontal plane envelope pattern of the proposed system with the zero degree bearing oriented true north, in accordance with §73.316(c)(2). Attached, as Exhibit #3B, is the tabulated relative field pattern, horizontal plane, of the envelope antenna pattern. Maxima and minima are noted on the tabulation. A representation of the typical vertical plane pattern of the proposed antenna system is included herein as Exhibit #3C.

There will be no other antennas or tower attachments, including top-mounted platforms, installed near the directional antenna system. Any other antennas mounted on the tower structure will be placed far enough away from the directional radiator so as not to affect the directional pattern. This distance which other antennas must be away from the FM radiator will be specified by the antenna manufacturer.

When Community Educational Association files FCC Form 302-FM, it will include a statement from an engineer that the antenna has been properly assembled and installed. A statement from a licensed surveyor will also be included to demonstrate that the antenna has been oriented pursuant to the manufacturer's instructions. As previously noted, the Form 302-FM application will also be accompanied by the antenna manufacturer's measured pattern and tabulated relative field.



HORIZONTAL PLANE PATTERN

NOTE : THIS IS AN ENVELOPE PATTERN OF THE PROPOSED DIRECTIONAL ANTENNA SYSTEM.

EXHIBIT #3A
 AMEND BPED-930316MF
 COMM. EDUCATIONAL ASSOC.
 NONCOMMERCIAL FM STATION
 CH 201A - 2.0 KW (V)
 HOLLY HILL, FLORIDA
 August 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AMEND BPED-930316MF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NONCOMMERCIAL STATION
CH 201A - 88.1 MHZ - 2.0 KW
HOLLY HILL, FLORIDA
August 1994

EXHIBIT #3B

Tabulated Relative Field Pattern

DEGREES	RELATIVE FIELD	DEGREES	RELATIVE FIELD
0	1.000	180	.350
10	1.000	190	.330
20	1.000	+ 200	.320
30	1.000	210	.320
40	1.000	220	.330
50	1.000	230	.340
60	1.000	240	.370
70	1.000	250	.420
80	1.000	260	.525
* 90	1.000	270	.655
100	.980	280	.780
110	.920	290	.870
120	.820	300	.940
130	.700	310	.980
140	.560	* 320	1.000
150	.470	330	1.000
160	.410	340	1.000
170	.380	350	1.000

+ Minima Relative Field.

* Maxima Relative Field.

ELECTRONICS RESEARCH, INC.
308 MARKET STREET
NEW BRUNSWICK, N.J. 07102

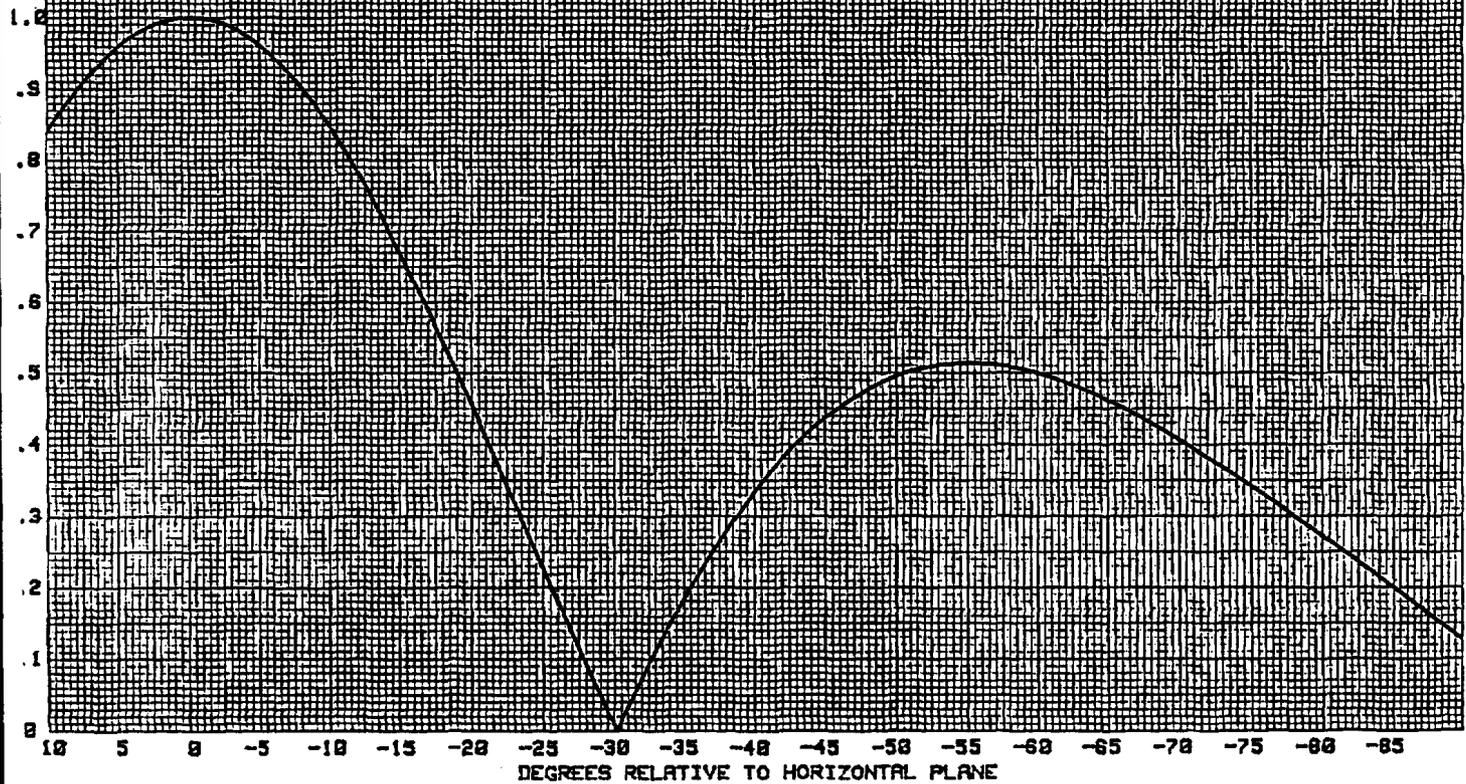
THEORETICAL
VERTICAL PLANE RELATIVE FIELD

JULY 1994

ELEVEN SPACING
WAVELENGTHS

FIGURE 38

2 VERTICAL DIPOLE ELEMENTS WITH A SEPARATION OF 0.5 WAVELENGTHS
3 PERCENT (1 DB) NULL LOSS
4 PERCENT (2 DB) NULL LOSS



VERTICAL PLANE PATTERN

NOTE : THIS IS THE TYPICAL VERTICAL PLANE
RELATIVE FIELD PATTERN OF AN ERI
P300-2 ANTENNA SYSTEM.

EXHIBIT #3C

AMEND BPED-930316MF
COMM. EDUCATIONAL ASSOC.
NONCOMMERCIAL FM STATION
CH 201A - 2.0 KW (V)
HOLLY HILL, FLORIDA
August 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AMEND BPED-930316MF
COMMUNITY EDUCATIONAL ASSOCIATION
NEW NONCOMMERCIAL STATION
CH 201A - 88.1 MHZ - 2.0 KW
HOLLY HILL, FLORIDA
August 1994

EXHIBIT #4

Facilities Within Study

There are no proposed or authorized FM or Television transmitters, or any non-broadcast radio stations, within 60 meters of this proposal. There are no known established commercial or government receiving stations or cable head-end facilities within the blanketing contour of this proposal. However, within the blanketing contour there are some sparsely populated areas. See Exhibit #4A for a detailed FM blanketing study and statement.

There are several authorized or proposed FM transmitters within 10 kilometers of this proposal. A complete list of these facilities/proposals is attached as Exhibit #4B. It is the experience of Graham Brock, Inc., that none of the stations listed will produce any receiver-induced third-order intermodulation effect ("RITOIE") nor otherwise be adversely affected as a result of the grant and subsequent operation of this proposal. Should any problems arise Community Educational Association will use sound engineering, including, but not limited to, the installation of filters and RF traps, as necessary, to remedy any unexpected RITOIE to the Commission's satisfaction. There are no TV stations within 10 kilometers of this proposal. There are no AM stations within 3.2 kilometers (2.0 miles) of this proposal.

FM BLANKETING CONTOUR CALCULATION

The blanketing contour of the proposed new noncommercial station is determined using the following formula as defined in §73.318 of the Commission's Rules:

$$D = 0.394 * \text{SQR}(P)$$

where D= distance to blanketing contour in kilometers.
P= power (in kilowatts) of the proposed station.

The effective radiated power of the proposed new non-commercial station is 2.0 kilowatts which yields a blanketing contour 0.56 kilometers from the tower. While it is the experience of this firm that very little, if any, blanketing interference will be experienced by the grant and subsequent operation of this proposal, Community Educational Association will follow the guidelines of §73.318 and use sound engineering practices to remedy any blanketing complaints to the Commission's satisfaction.

FM BLANKETING CONTOUR STUDY

EXHIBIT #4A

AMEND BPED-930316MF
COMM. EDUCATIONAL ASSOC.
NONCOMMERCIAL FM STATION
CH 201A - 2.0 KW (V)
HOLLY HILL, FLORIDA
August 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AM STATIONS WITHIN 5 KM

FREQ KM MI BEARING LAT / LONG STATUS CL PWR FIELD CL CO ST CITY

NONE

FM STATIONS WITHIN 12 KM

CHANNEL	KM	MI	BEARING	LAT / LONG	STATUS	PWR	CALL	ST	CITY
212A	10.37	(6.44)	6.0	29-22-18/ 81-10-45	AP	2.00	AP212	FL	Flagler Beach
239A	10.52	(6.54)	95.2	29-16-13/ 81- 4-56	AP	3.00	AP239	FL	Ormond-By-The-Sea
239A	11.52	(7.16)	90.1	29-16-43/ 81- 4-17	AP	3.00	AP239	FL	Ormond-By-The-Sea
239A	6.03	(3.75)	6.7	29-19-58/ 81-10-59	AP	3.00	AP239	FL	Ormond-By-The-Sea
239A	6.03	(3.75)	6.7	29-19-58/ 81-10-59	AP	3.00	AP239	FL	Ormond-By-The-Sea
277A	7.20	(4.47)	115.1	29-15- 5/ 81- 7-23	CP	3.00	CP277	FL	Holly Hill

TV STATIONS WITHIN 12 KM

CHANNEL KM MI BEARING LAT / LONG STATUS PWR CALL ST CITY

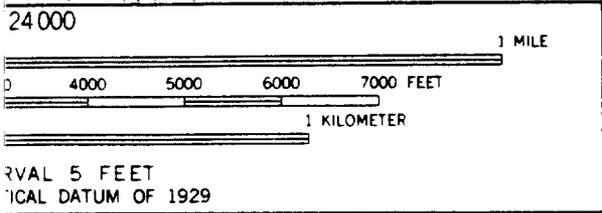
NONE

FACILITIES WITHIN STUDY

EXHIBIT #4B
 AMEND BPED-930316MF
 COMM. EDUCATIONAL ASSOC.
 NONCOMMERCIAL FM STATION
 CH 201A - 2.0 KW (V)
 HOLLY HILL, FLORIDA
 August 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



FAVORETTA QUADRANGLE
FLORIDA
7.5 MINUTE SERIES (TOPOGRAPHIC)

29-17-30

81-10-00

AN ORIGINAL FAVORETTA 7.5 MINUTE TOPOGRAPHIC MAP IS ATTACHED TO THE ORIGINAL HOLLY HILL APPLICATION (ONLY) AS EXHIBIT #5A.

81-07-30

EXHIBIT #5
AMEND BPED-930316MF
COMM. EDUCATIONAL ASSOC.
NONCOMMERCIAL FM STATION
CH 201A - 2.0 KW (V)
HOLLY HILL, FLORIDA
August 1994

29-15-00

U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 1993
 487000m E

29°15'
 81°07'30"