Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
237.0	8.2	172.6	88.9	252	93.3	50.8	33.9	237.0	8.22	142	6.00	84.7
238.0	5.9	171.3	87.8	256	93.3	51.5	39.1*	238.0	5.89	142	6.00	90.6
239.0	5.9	171.3	87.7	256	93.3	51.5	39.1*	239.0	5.90	143	6.00	90.6
240.0	5.9	171.4	87.6	256	93.3	51.5	39.0*	240.0	5.91	143	6.00	90.6
241.0	5.9	171.4	87.5	256	93.3	51.6	39.0*	241.0	5.93	144	6.00	90.5
242.0	5.9	171.4	87.4	256	93.3	51.6	38.9*	242.0	5.94	144	6.00	90.5
243.0	5.9	171.5	87.3	256	93.3	51.7	38.9*	243.0	5.95	145	6.00	90.5
244.0	6.0	171.5	87.2	256	93.3	51.7	38.8*	244.0	5.97	145	6.00	90.5
245.0	6.0	171.5	87.1	256	93.3	51.7	38.8*	245.0	5.98	146	6.00	90.5
246.0	6.0	171.5	87.0	256	93.3	51.8	38.7*	246.0	5.99	146	6.00	90.5
247.0	6.0	171.6	86.9	256	93.3	51.8	38.7*	247.0	6.01	147	6.00	90.5
248.0	6.0	171.6	86.8	256	93.3	51.9	38.6*	248.0	6.02	147	6.00	90.5
249.0	6.0	171.6	86.7	256	93.3	51.9	38.6*	249.0	6.03	148	6.00	90.5
250.0	6.0	171.6	86.6	256	93.3	51.9	38.5*	250.0	6.04	148	6.00	90.4
251.0	6.1	171.7	86.5	256	93.3	52.0	38.5*	251.0	6.05	148	6.00	90.4
252.0	6.1	171.7	86.4	256	93.3	52.0	38.4*	252.0	6.06	149	6.00	90.4
253.0	6.1	171.7	86.3	256	93.3	52.1	38.4*	253.0	6.08	149	6.00	90.4
254.0	6.1	171.7	86.2	256	93.3	52.1	38.3*	254.0	6.09	150	6.00	90.4
255.0	6.1	171.7	86.1	256	93.3	52.2	38.2*	255.0	6.11	150	6.00	90.4
256.0	6.1	171.8	86.0	256	93.3	52.2	38.2*	256.0	6.12	151	6.00	90.4
257.0	6.1	171.8	85.9	256	93.3	52.3	38.1*	257.0	6.13	151	6.00	90.4
258.0	6.2	171.8	85.8	256	93.3	52.3	38.1*	258.0	6.15	152	6.00	90.4
259.0	6.2	171.8	85.7	256	93.3	52.3	38.0*	259.0	6.16	152	6.00	90.4
260.0	6.2	171.8	85.6	256	93.3	52.4	38.0*	260.0	6.17	153	6.00	90.4
261.0	6.2	171.8	85.5	256	93.3	52.4	37.9*	261.0	6.19	153	6.00	90.3
262.0	6.2	171.8	85.4	256	93.3	52.5	37.9*	262.0	6.20	154	6.00	90.3

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
263.0	6.2	171.8	85.3	256	93.3	52.5	37.8*	263.0	6.22	154	6.00	90.3
264.0	6.2	171.9	85.2	256	93.3	52.6	37.7*	264.0	6.23	155	6.00	90.3
265.0	6.2	171.9	85.1	256	93.3	52.6	37.7*	265.0	6.24	155	6.00	90.3
266.0	6.3	171.9	84.9	256	93.3	52.7	37.6*	266.0	6.26	155	6.00	90.3
267.0	6.3	171.9	84.8	256	93.3	52.7	37.6*	267.0	6.27	156	6.00	90.3
268.0	6.3	171.9	84.7	256	93.3	52.8	37.5*	268.0	6.29	156	6.00	90.2
269.0	6.3	171.9	84.6	256	93.3	52.8	37.4*	269.0	6.30	157	6.00	90.2
270.0	6.3	171.9	84.5	256	93.3	52.9	37.4*	270.0	6.31	157	6.00	90.2
271.0	6.3	171.9	84.4	256	93.3	52.9	37.3*	271.0	6.31	157	6.00	90.2
272.0	6.3	171.8	84.3	256	93.3	52.9	37.3*	272.0	6.31	157	6.00	90.2
273.0	6.3	171.8	84.2	256	93.3	53.0	37.2*	273.0	6.31	156	6.00	90.2
274.0	6.3	171.8	84.1	256	93.3	53.0	37.2*	274.0	6.30	156	6.00	90.2
275.0	6.3	171.8	84.0	256	93.3	53.1	37.1*	275.0	6.30	156	6.00	90.2
276.0	6.3	171.8	83.9	256	93.3	53.1	37.0*	276.0	6.30	155	6.00	90.1
277.0	6.3	171.7	83.8	256	93.3	53.2	37.0*	277.0	6.29	155	6.00	90.2
278.0	6.3	171.7	83.7	256	93.3	53.2	36.9*	278.0	6.29	155	6.00	90.1
279.0	6.3	171.7	83.5	256	93.3	53.3	36.9*	279.0	6.29	154	6.00	90.1
280.0	6.3	171.7	83.4	256	93.3	53.3	36.8*	280.0	6.28	154	6.00	90.1
281.0	6.3	171.7	83.3	256	93.3	53.4	36.8*	281.0	6.28	154	6.00	90.1
282.0	6.3	171.6	83.2	256	93.3	53.4	36.7*	282.0	6.27	153	6.00	90.1
283.0	6.3	171.6	83.1	256	93.3	53.4	36.7*	283.0	6.27	153	6.00	90.1
284.0	6.3	171.6	83.0	256	93.3	53.5	36.6*	284.0	6.26	153	6.00	90.1
285.0	6.3	171.5	82.9	256	93.3	53.5	36.6*	285.0	6.26	152	6.00	90.1
286.0	6.3	171.5	82.8	256	93.3	53.6	36.5*	286.0	6.25	152	6.00	90.1
287.0	6.3	171.5	82.7	256	93.3	53.6	36.5*	287.0	6.25	152	6.00	90.1
288.0	6.2	171.4	82.7	256	93.3	53.6	36.5*	288.0	6.24	151	6.00	90.1

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
289.0	6.2	171.4	82.6	256	93.3	53.7	36.4*	289.0	6.23	151	6.00	90.1
290.0	6.2	171.3	82.5	256	93.3	53.7	36.4*	290.0	6.23	151	6.00	90.1
291.0	6.2	171.3	82.4	256	93.3	53.8	36.3*	291.0	6.22	150	6.00	90.1
292.0	6.2	171.3	82.3	256	93.3	53.8	36.3*	292.0	6.22	150	6.00	90.1
293.0	6.2	171.2	82.2	256	93.3	53.8	36.2*	293.0	6.21	150	6.00	90.1
294.0	6.2	171.2	82.1	256	93.3	53.9	36.2*	294.0	6.20	149	6.00	90.1
295.0	6.2	171.1	82.0	256	93.3	53.9	36.2*	295.0	6.20	149	6.00	90.1
296.0	6.2	171.1	81.9	256	93.3	54.0	36.1*	296.0	6.19	148	6.00	90.1
297.0	6.2	171.0	81.9	256	93.3	54.0	36.1*	297.0	6.18	148	6.00	90.1
298.0	6.2	171.0	81.8	261	93.3	54.2	35.9*	298.0	6.18	148	6.00	90.0
299.0	6.2	170.9	81.7	261	93.3	54.2	35.8*	299.0	6.17	147	6.00	90.1
300.0	6.2	170.9	81.6	261	93.3	54.3	35.8*	300.0	6.17	147	6.00	90.0
301.0	6.2	170.8	81.5	261	93.3	54.3	35.7*	301.0	6.16	147	6.00	90.0
302.0	6.2	170.8	81.4	261	93.3	54.3	35.7*	302.0	6.15	146	6.00	90.1
303.0	6.2	170.7	81.4	261	93.3	54.4	35.7*	303.0	6.15	146	6.00	90.0
304.0	6.1	170.7	81.3	261	93.3	54.4	35.6*	304.0	6.14	146	6.00	90.0
305.0	6.1	170.6	81.2	261	93.3	54.4	35.6*	305.0	6.13	145	6.00	90.0
306.0	6.1	170.6	81.1	261	93.3	54.5	35.6*	306.0	6.13	145	6.00	90.0
307.0	6.1	170.5	81.1	261	93.3	54.5	35.5*	307.0	6.12	145	6.00	90.0
308.0	6.1	170.5	81.0	261	93.3	54.5	35.5*	308.0	6.11	144	6.00	90.0
309.0	6.1	170.4	80.9	261	93.3	54.6	35.5*	309.0	6.11	144	6.00	90.0
310.0	6.1	170.3	80.9	261	93.3	54.6	35.5*	310.0	6.10	144	6.00	90.0
311.0	6.1	170.3	80.8	261	93.3	54.6	35.4*	311.0	6.09	143	6.00	90.0
312.0	6.1	170.2	80.8	261	93.3	54.6	35.4*	312.0	6.09	143	6.00	90.0
313.0	6.1	170.2	80.7	261	93.3	54.7	35.4*	313.0	6.08	143	6.00	90.0
314.0	6.1	170.1	80.6	261	93.3	54.7	35.3*	314.0	6.08	142	6.00	90.0

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
315.0	6.1	170.0	80.6	261	93.3	54.7	35.3*	315.0	6.07	142	6.00	90.0
316.0	6.0	170.0	80.5	265	93.3	54.9	35.1*	316.0	6.04	140	6.00	90.0
317.0	6.0	169.9	80.5	265	93.3	54.9	35.1*	317.0	6.02	139	6.00	90.0
318.0	6.0	169.8	80.5	265	93.3	54.9	35.1*	318.0	5.99	137	6.00	90.0
319.0	5.9	169.7	80.5	265	93.3	55.0	35.1*	319.0	5.95	136	6.00	90.0
320.0	5.9	169.7	80.4	265	93.3	55.0	35.0*	320.0	5.92	134	6.00	90.0
321.0	5.9	169.6	80.4	265	93.3	55.0	35.0*	321.0	5.89	132	6.00	90.0
322.0	5.8	169.5	80.4	265	93.3	55.0	35.0*	322.0	5.85	131	6.00	90.0
323.0	5.8	169.4	80.4	265	93.3	55.0	35.0*	323.0	5.82	129	6.00	90.0
324.0	5.8	169.4	80.4	265	93.3	55.0	35.0*	324.0	5.79	128	6.00	90.0
325.0	5.8	169.3	80.3	265	93.3	55.0	35.0*	325.0	5.75	126	6.00	90.0
326.0	5.7	169.2	80.3	265	93.3	55.0	35.0*	326.0	5.72	124	6.00	90.0
327.0	5.7	169.1	80.3	265	93.3	55.0	35.0*	327.0	5.69	123	6.00	90.0
328.0	5.7	169.1	80.3	265	93.3	55.0	35.0*	328.0	5.65	121	6.00	90.0
329.0	5.6	169.0	80.3	270	93.3	55.2	34.8*	329.0	5.63	120	6.00	90.0
330.0	5.6	168.9	80.3	270	93.3	55.2	34.8*	330.0	5.60	118	6.00	90.0
331.0	5.6	168.8	80.3	270	93.3	55.2	34.8*	331.0	5.57	116	6.00	90.0
332.0	5.5	168.8	80.3	270	93.3	55.2	34.8*	332.0	5.53	115	6.00	90.0
333.0	5.5	168.7	80.3	270	93.3	55.2	34.8*	333.0	5.49	113	6.00	90.0
334.0	5.4	168.6	80.3	270	93.3	55.2	34.8*	334.0	5.45	112	6.00	90.0
335.0	5.4	168.5	80.4	270	93.3	55.2	34.8*	335.0	5.41	110	6.00	90.0
336.0	5.4	168.5	80.4	270	93.3	55.2	34.8*	336.0	5.37	108	6.00	90.0
337.0	5.3	168.4	80.4	270	93.3	55.2	34.8*	337.0	5.33	107	6.00	90.0
338.0	5.3	168.3	80.4	270	93.3	55.2	34.8*	338.0	5.29	105	6.00	90.0
339.0	5.2	168.3	80.4	270	93.3	55.1	34.8*	339.0	5.24	104	6.00	90.0
340.0	5.2	168.2	80.5	270	93.3	55.1	34.9*	340.0	5.21	102	6.00	90.0

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	O/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
341.0	5.2	168.1	80.5	270	93.3	55.1	34.9*	341.0	5.16	101	6.00	90.0
342.0	5.1	168.1	80.5	270	93.3	55.1	34.9*	342.0	5.12	98.9	6.00	90.0
343.0	5.1	168.0	80.6	274	93.3	55.3	34.7*	343.0	5.08	97.3	6.00	90.0
344.0	5.0	167.9	80.6	274	93.3	55.2	34.7*	344.0	5.03	95.7	6.00	90.0
345.0	5.0	167.9	80.6	274	93.3	55.2	34.7*	345.0	4.99	94.1	6.00	89.9
346.0	4.9	167.8	80.7	274	93.3	55.2	34.8*	346.0	4.94	92.5	6.00	89.9
347.0	4.9	167.7	80.7	274	93.3	55.2	34.8*	347.0	4.89	90.9	6.00	90.0
348.0	4.8	167.7	80.8	274	93.3	55.2	34.8*	348.0	4.84	89.3	6.00	90.0
349.0	4.8	167.6	80.8	274	93.3	55.2	34.8*	349.0	4.79	87.7	6.00	90.0
350.0	4.7	167.6	80.9	274	93.3	55.1	34.9*	350.0	4.75	86.2	6.00	90.0
351.0	4.7	167.5	80.9	274	93.3	55.1	34.9*	351.0	4.70	84.6	6.00	90.0
352.0	4.6	167.4	81.0	274	93.3	55.1	34.9*	352.0	4.65	83.0	6.00	90.0
353.0	4.6	167.4	81.0	274	93.3	55.1	34.9*	353.0	4.60	81.4	6.00	90.0
354.0	4.6	167.3	81.1	274	93.3	55.0	35.0*	354.0	4.55	79.8	6.00	90.0
355.0	4.5	167.3	81.2	274	93.3	55.0	35.0*	355.0	4.50	78.2	6.00	90.0
356.0	4.5	167.2	81.2	274	93.3	55.0	35.0*	356.0	4.46	76.6	6.00	90.0
357.0	4.4	167.2	81.3	274	93.3	55.0	35.0*	357.0	4.41	75.0	6.00	90.0
358.0	4.4	167.1	81.3	274	93.3	54.9	35.1*	358.0	4.37	73.4	6.00	90.0
359.0	4.3	167.1	81.4	274	93.3	54.9	35.1*	359.0	4.32	71.8	6.00	90.0

Total interference area: 106.992 sq km (41.3100 sq km.)

FM site coordinates: 41-53-00 73-46-30 FM height above mean sea level: 257 m

6 dB TV receiving antenna directivity applied per 73.525(e)(1)(iii).

FM effective radiated power (in kW): 6.000

TV site coordinates: 42-38-12 73-59-45

TV height above average terrain: 311 m

TV effective radiated power (in kW): 93.30

Area of Interference.

bear. (deg)	Dist. (km)
.0	4.3
5.0	4.3
10.0	4.3
15.0	4.3
20.0	4.3
25.0	4.3
30.0	4.3
35.0	4.4
40.0	4.4
45.0	4.4
50.0	4.2
55.0	4.1
60.0	3.9
65.0	3.7
70.0	3.5
75.0	3.2
80.0	3.0
85.0	2.8
90.0	2.8
95.0	2.8
100.0	4.0
105.0	4.3
110.0	4.6
115.0	4.8
120.0	5.0
125.0	5.3
130.0	5.4
135.0	5.6
140.0	5.9
145.0	6.2
150.0	6.4
155.0	6.7
160.0	7.0
165.0	7.2
170.0	7.4
175.0	7.6
180.0	7.8
185.0	7.8
190.0	7.8
195.0	7.9
200.0	7.9
205.0	7.9
210.0	7.9
215.0	7.9
220.0	8.0
225.0	8.0
230.0	8.1
235.0	8.2
240.0	5.9
245.0	6.0
250.0	6.0
255.0	6.1
260.0	6.2
265.0	6.2
270.0	6.3
275.0	6.3
280.0	6.3
285.0	6.3
290.0	6.2
295.0	6.2
300.0	6.2
305.0	6.1
310.0	6.1
315.0	6.1
320.0	5.9
325.0	5.8
330.0	5.6
335.0	5.4
340.0	5.2
345.0	5.0
350.0	4.7
355.0	4.5

Population within coverage area
Total Population (1990 Census): 4,179

CERTIFICATE OF SERVICE

I, Joy N. Johnson, of Dow, Lohnes & Albertson, certify that a copy of the forgoing Comments of SUNY were mailed, first class, postage prepaid, this 6th day of October, 1997 to the following:

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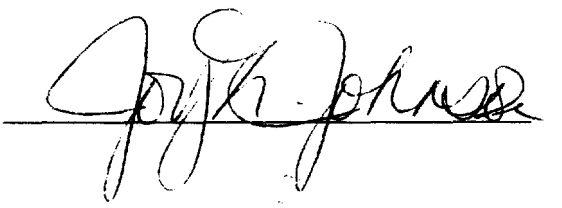

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TO: William C. Robedee
State University College at New Paltz

FAX NUMBER: 914-257-3099

CONFIRMATION NO.: 914-257-3084

FROM: Margaret L. Miller MLM DIRECT DIAL: 202-776-2914

DATE: October 6, 1997

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FAX NUMBER: 914-257-3099

CONFIRMATION NO.: 914-257-3084

FROM: Margaret L. Miller MLM DIRECT DIAL: 202-776-2914

DATE: October 6, 1997

MESSAGE: Please see attached copy of SUNY's comments, as filed with FCC today.

** If you do not receive all of the pages, please call the Fax Center at (202) 776-2820 or Sue Fischer at (202) 776-2772 as soon as possible.

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 97-178
Table of Allotments,	)	RM-8329
FM Broadcast Stations,	)	RM-8739
(West Hurley and Rosendale, New York,	)	
North Canaan and Sharon, Connecticut)	)	

RECEIVED
OCT 21 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

REPLY of SUNY

State University of New York ("SUNY"), by its counsel, replies to the comments filed with respect to the above-captioned matter.

As previously explained by SUNY, the allotments proposed in this proceeding are entirely contingent on resolution of MM Docket 93-17 and SUNY's proposed use of Channel 255A or Channel 273A for modified Station WFNP(FM) at Rosendale, New York.

With that understanding in mind, SUNY reviewed the comments in the instant proceeding. Under the FCC's well-established criteria for FM allotments, SUNY's counterproposal for Channel 273A at Rhinebeck, New York is preferred over the West Hurley or North Canaan proposals. *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982), *recon. denied* 56 RR2d 48 (1984). First, allotting Channel 273A to Rhinebeck, New York would provide first local aural transmission service to the community, in accordance with Priority 3. Second, Rhinebeck, New York (population 7,558 persons) is a larger community than either West Hurley, New York (population 2,252 persons) or North Canaan, Connecticut (population 3,284 persons). In a choice among competing proposals that involved Priority 3, the Commission has uniformly preferred the larger community under Priority 4, based on a straight

population comparison. *See, e.g., Blanchard, Louisiana and Stephens, Arkansas,* 8 FCC Rcd 7083 (1993), *rev. denied,* 10 FCC Rcd 9828 (1995); *Good Hope and Bostwick, Georgia,* 6 FCC Rcd 5796 (1990).

Third, reserving Channel 273A for noncommercial educational use is consistent with Commission policies, because use of a reserved band channel is precluded by Channel 6 interference considerations. Moreover, reserving Channel 273A would provide significant numbers of persons with a first or second noncommercial educational radio programming service, consistent with Section 396(a) of the Communications Act of 1934, which declares that the public interest is served by extending noncommercial educational broadcasting service to unserved and underserved areas. Fourth, while SUNY sympathizes with the applicants for Channel 273A at Rosendale, New York, who must select new transmitter sites, those applicants are not entitled to have their individual site preferences protected by SUNY's counterproposal or the other proposals in this rulemaking.

Finally, Sacred Heart University ("SHU") claims that public interest benefits will flow from the allotment of Channel 277A to North Canaan because Station WQQQ can be upgraded from 3 kilowatts to 6 kilowatts on Channel 273A with a site relocation. This public interest benefit is illusory. As shown in the attached Engineering Statement, Station WQQQ could be upgraded on its current channel with a site relocation (and could be upgraded, to some degree, at its current site or applied-for site). Thus, any public interest benefits associated with the upgrade of Station WQQQ are unrelated to SHU's proposal and should not be considered by the Allocations Branch in this proceeding.

For the reasons stated above, SUNY submits that its counterproposal is preferred to the West Hurley and North Canaan proposals under Commission rules, policies and precedent. SUNY reiterates its intention to apply for Channel *273A at the Town of Rhinebeck, New York, if allotted as proposed, and to promptly construct the station if the permit is awarded to SUNY.

Respectfully submitted,

STATE UNIVERSITY OF NEW YORK

By: Margaret L. Miller

Todd D. Gray
Margaret L. Miller
Its Attorneys

DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Avenue, N.W., #800
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October 21, 1997

ATTACHMENT 1

ENGINEERING STATEMENT

Engineering Exhibit #EE-1 in support of the State University of New York Reply Comments in MM Docket 97-178

General

Radio South Burlington, Inc. (RSB), Licensee of WQQQ, Sharon, CT expressed in its comments their belief that a change in frequency from the existing channel 277A to channel 273A would serve the public's interest because channel 273A offers areas to locate that would allow WQQQ to serve a larger population. WQQQ is currently licensed at the equivalent of 3kW at 100m due to a minor short spacing to WGNY, 276A, Newburgh, NY. RSB also has an application pending for modification of WQQQ's facilities specifying a new transmitter location, HAAT and power. The purpose of this engineering exhibit is to demonstrate that a large area exists on WQQQ's present channel where operation at maximum class A facilities is possible. Additionally, if WQQQ elected to change sites to the clear spaced area on channel 277A, a larger population could be covered than from either their present or proposed locations.

Discussion

Table 1 is a frequency search showing the constraining factors for locating WQQQ's transmitter. Figure 1 is a map, graphically showing the available area in which WQQQ can locate on channel 277A using maximum facilities. Of course, many other locations are possible, including the existing WQQQ site by employing section 73.215 of the rules.

Figure 2 is a coverage map from one possible upgrade location. The 60dBu contour covers the large community of Kingston, NY and would serve a total population of 133,572 persons. By contrast, WQQQ were to upgrade on channel 273A at their existing site, the total population within the 60dBu contour would be 99,883 persons. Figure 3 is a map showing WQQQ's possible coverage from the existing site on channel 273A. An upgrade on channel 273A at the location proposed in WQQQ's application would serve 121,174 persons in the 60dBu contour. Figure 4 is a map depicting coverage from maximum facilities on at WQQQ's application site. Clearly, it is not necessary for WQQQ to change frequencies in order to increase its coverage area or upgrade to 6kW.

Engineering prepared by:

Kyle Magrill
Technical Consultant
(352) 336-0567
3716 SW 3rd Place
Gainesville, FL 32607

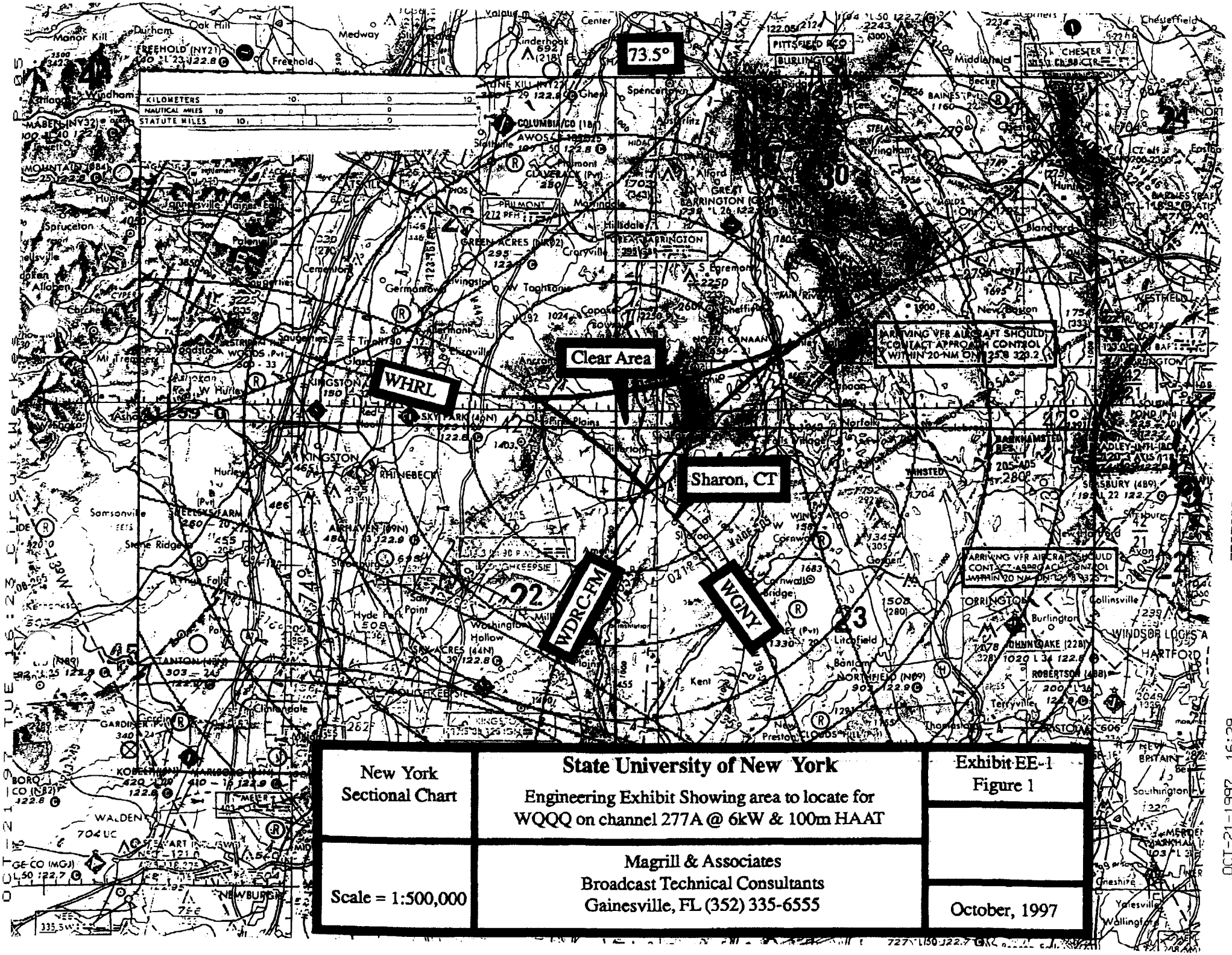
Magrill & Associates
Source Data is the NTIS/FCC database. We are not responsible for data errors.

Exhibit # EE-1, Table 1
One possible WQQQ 6kW Upgrade location on ch 277A

REFERENCE
41 59 00 N
73 33 30 W

CLASS A
Current rules spacings
CHANNEL 277 -103.3 MHz

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WGNYFM LI CN	276A 41 28 22	Newburgh 74 08 22	NY 3.500 kW	220.5 84M	74.52 46.3	72.0 44.8	2.52 <
		Sunrise Broadcasting of New Y			BMLH920407KD		
WHRL LI CN	276A 42 39 46	Albany 73 40 37	NY 3.000 kW	352.6 99M	76.10 47.3	72.0 44.8	4.10
		Regal Broadcasting Corporatio			BLH690324IA		
>Referred to Canada as B1 on 951011-Accepted by Canada 960220							
WDRCFM LI CN	275B 41 33 44	Hartford 72 50 40	CT 19.500 kW	128.2 247M	75.57 47.0	69.0 42.9	6.57
		Buckley Broadcasting Corporat			BLH791106AH		
WODS LI CN	277B 42 18 27	Boston 71 13 27	MA 16.000 kW	79.4 270M	196.28 122.0	178.0 110.6	18.28
		CBS Inc.			BLH871029KC		
WQBJ LI CN	278B 42 58 21	Cobleskill 74 29 30	NY 50.000 kW	325.1 150M	134.03 83.3	113.0 70.2	21.03
		Maximum Media, Inc.			BLH950118KB		
WKTU.C CP CN	278B 40 43 38	Lake Success 74 02 14	NY 2.000 kW	196.0 164M	145.14 90.2	113.0 70.2	32.14
		BPI New York License Subsidia			BPH950306IY	961020	
WPRB LI CN	277B 40 17 00	Princeton 74 41 20	NJ 14.000 kW	206.7 223M	211.32 131.3	178.0 110.6	33.32
		Princeton Broadcasting Servic			BLH911028KB		



New York Sectional Chart	**State University of New York** Engineering Exhibit Showing area to locate for WQQQ on channel 277A @ 6kW & 100m HAAT	Exhibit EE-1 Figure 1
Scale = 1:500,000	Magrill & Associates Broadcast Technical Consultants Gainesville, FL (352) 335-6555	October, 1997

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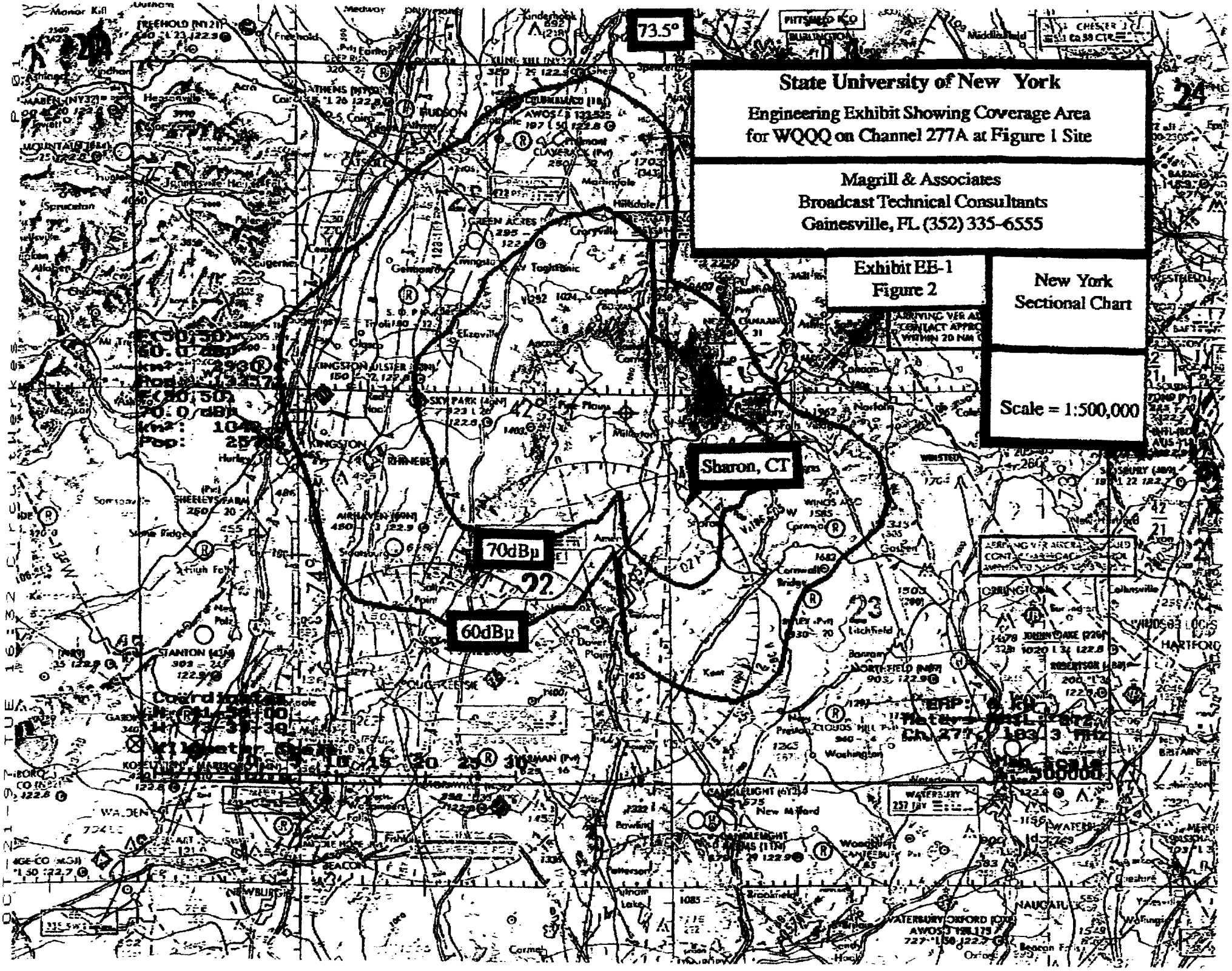
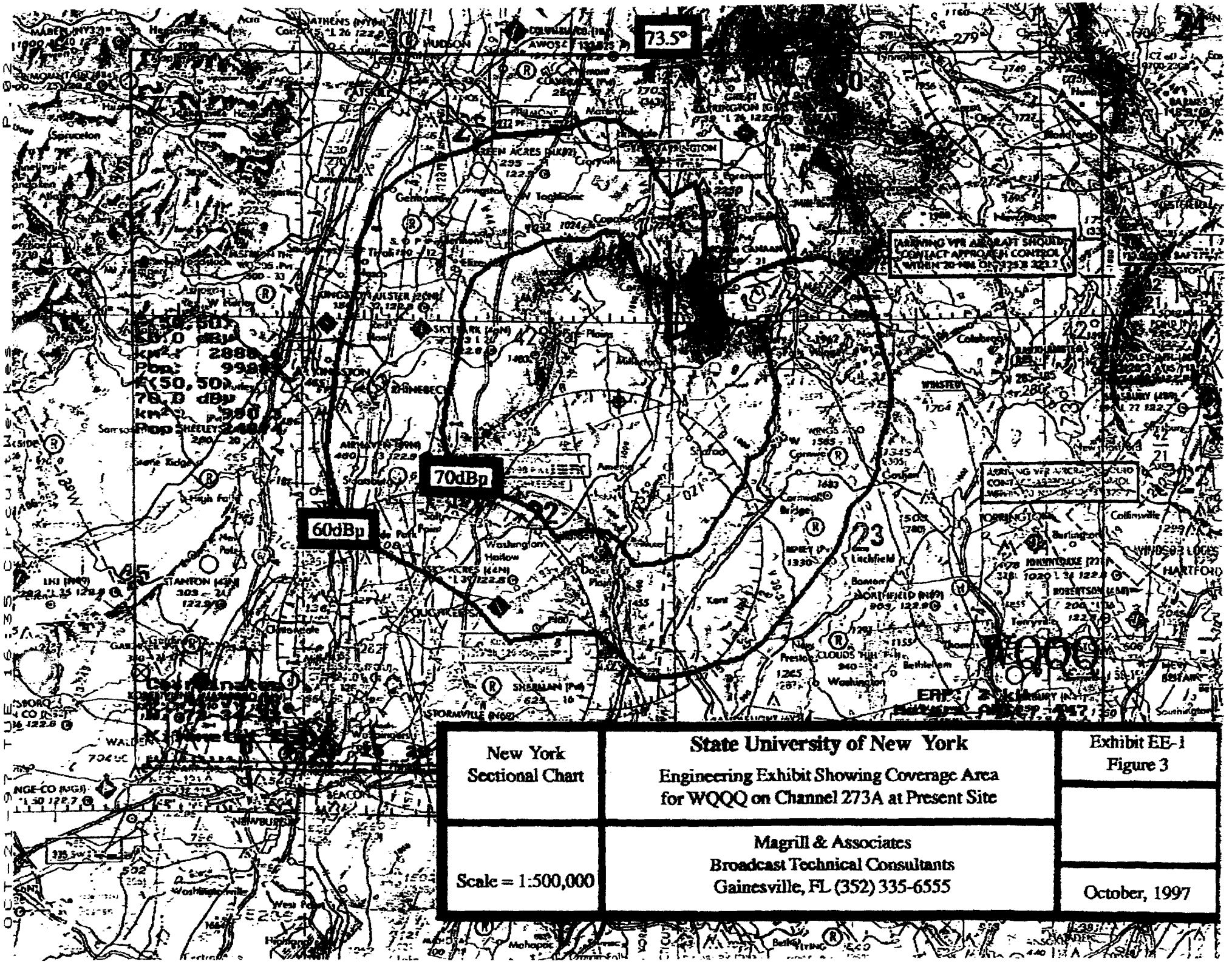
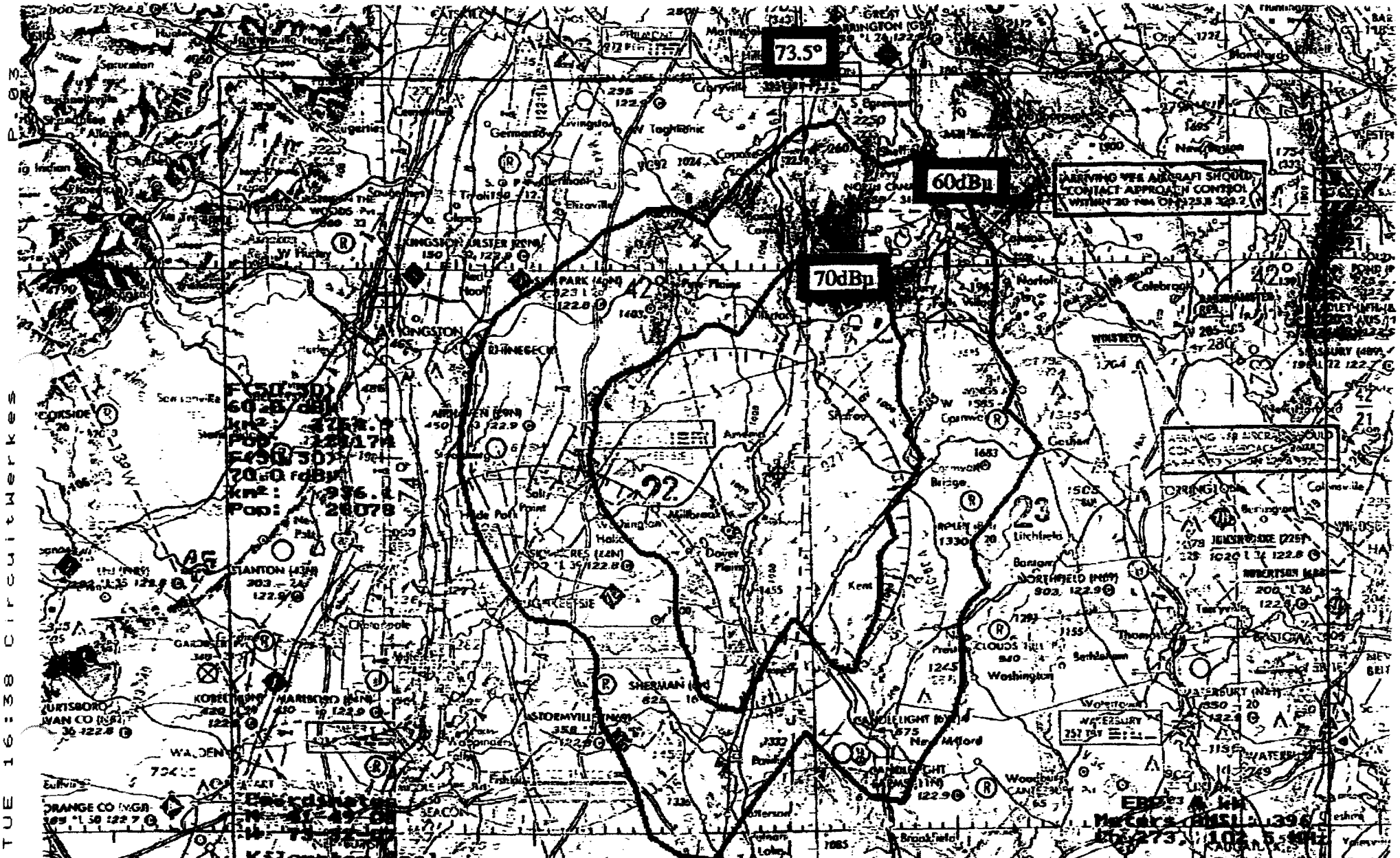

73.5°
State University of New York
Engineering Exhibit Showing Coverage Area
for WQQQ on Channel 277A at Figure 1 Site
Magrill & Associates
Broadcast Technical Consultants
Gainesville, FL (352) 335-6555
Exhibit EE-1
Figure 2
New York
Sectional Chart
Scale = 1:500,000
Sharon, CT
70dBu
60dBu


73.5°
70dBμ
60dBμ
New York Sectional Chart
State University of New York
Engineering Exhibit Showing Coverage Area for WQQQ on Channel 273A at Present Site
Exhibit EE-1
Figure 3
Magrill & Associates
Broadcast Technical Consultants
Gainesville, FL (352) 335-6555
Scale = 1:500,000
October, 1997



New York Sectional Chart	**State University of New York** Engineering Exhibit Showing Coverage Area for WQQQ on Channel 273A at Application Site	Exhibit EE-1 Figure 4
Scale = 1:500,000	Magrill & Associates Broadcast Technical Consultants Gainesville, FL (352) 335-6555	October, 1997

OCT-21-97 TUE 16:38 Circuitwerkes

CERTIFICATE OF SERVICE

I, Susan J. Fischer, of Dow, Lohnes & Albertson, certify that a copy of the forgoing Comments of SUNY were mailed, first class, postage prepaid, this 21st day of October, 1997 to the following:

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I certify that a copy of the foregoing "Reply Comments in Support of Counterproposal" was served this 11th day of May, 2001, by hand delivery or First Class United States mail, postage prepaid, upon the following:

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