

# **EXHIBIT NO. 1**

**Technical Comments Prepared by Graham Brock**

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**TECHNICAL COMMENTS**  
**MB DOCKET #02-76**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC.**  
**ALLOT CHANNEL 291A**  
**POQUOSON, VIRGINIA**  
**July 2002**

**TECHNICAL EXHIBIT**

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TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc. ("Counterproponents"). The counterproponents submitted a counterproposal in MB Docket #02-76 that, among other requests, requested the Commission to allot Channel 291A to Poquoson, Virginia. In reply comments submitted to the Commission, Tidewater Communications, Inc. ("TCT") claims that the proposed reference site for Channel 291A is located offshore.

DISCUSSION

To determine the location of the proposed reference site in preparing the counterproposal, we placed the set of coordinates into a computer mapping program<sup>1</sup> to verify the proposed coordinates were located on land. This location was also reviewed using the Delorme Topo USA, Version 3.0, which also confirmed the location was not off-shore. Attached, as Exhibit #1, is a portion of the map produced by the Delorme Topo USA program, showing the site is located on land. This map was the basis for the certification in the Technical Statement attached to the counterproposal. Further, a representative of the counterproponents visited the location and,

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1) Delorme Street Atlas USA version 8.0.

utilizing a GPS receiver, confirms that the reference site is located on land.<sup>2</sup> He also submitted photographs verifying this conclusion in a separate declaration.

Although the issue of whether the site is on land has been confirmed, we additionally note that if the coordinates for the proposed reference site were changed to North Latitude 37° 12' 30" and West Longitude 76° 29' 07" (a change of only 2 seconds longitude), the reference site will plot on land on the 7.5 minute map submitted by TCI, as shown on Exhibit #2. Further, from this location, Channel 291A still meets the Commission's minimum distance separation requirements, as shown on Exhibit #3. Also attached as Exhibit #4 is a map depicting the area to locate a transmitter site for Channel 291A at Poquoson, Virginia.<sup>3</sup> It illustrates that there is sufficient area available for a transmitter site to serve Poquoson with a city grade signal. Based on the foregoing, Channel 291A can be allotted to Poquoson, Virginia, in compliance with the Commission's technical rules.

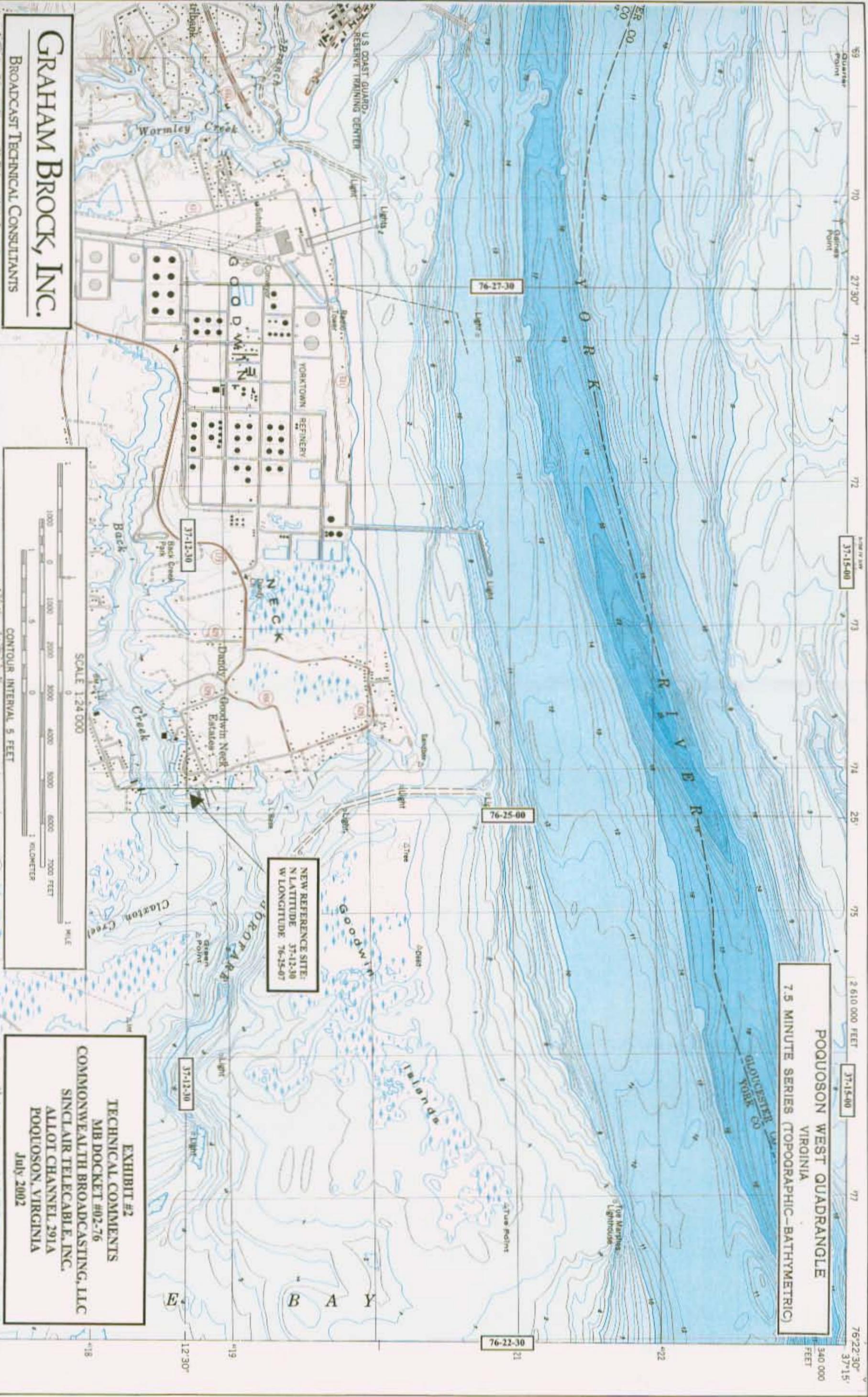
This information was prepared on behalf of Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc., by Graham Brock, Inc., their Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge.

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- 2) The map used by TCI was apparently a 1983 version of the Poquoson West, Virginia, 7.5 minute topographic map, which does not accurately depict the area in question. Unfortunately, there is not a later version of this map available from U.S.G.S..
  - 3) The spacing limits for WRDU and the proposed Nassawadox reference point are based on a rounded clearance distance. The required spacing distance was reduced by 0.49 kilometers.



POOUSON WEST QUADRANGLE  
 VIRGINIA  
 7.5 MINUTE SERIES (TOPOGRAPHIC-BATHYMETRIC)

340 000  
 FEET



NEW REFERENCE SITE:  
 N LATITUDE 37-12-30  
 W LONGITUDE 76-25-07

**GRAHAM BROCK, INC.**  
 BROADCAST TECHNICAL CONSULTANTS

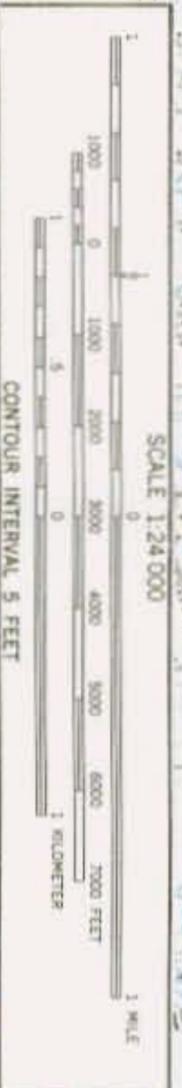


EXHIBIT #2  
 TECHNICAL COMMENTS  
 MB DOCKET #02-76  
 COMMONWEALTH BROADCASTING, LLC  
 SINCLAIR TELECABLE, INC.  
 ALLOT CHANNEL 291A  
 POOUSON, VIRGINIA  
 July 2002

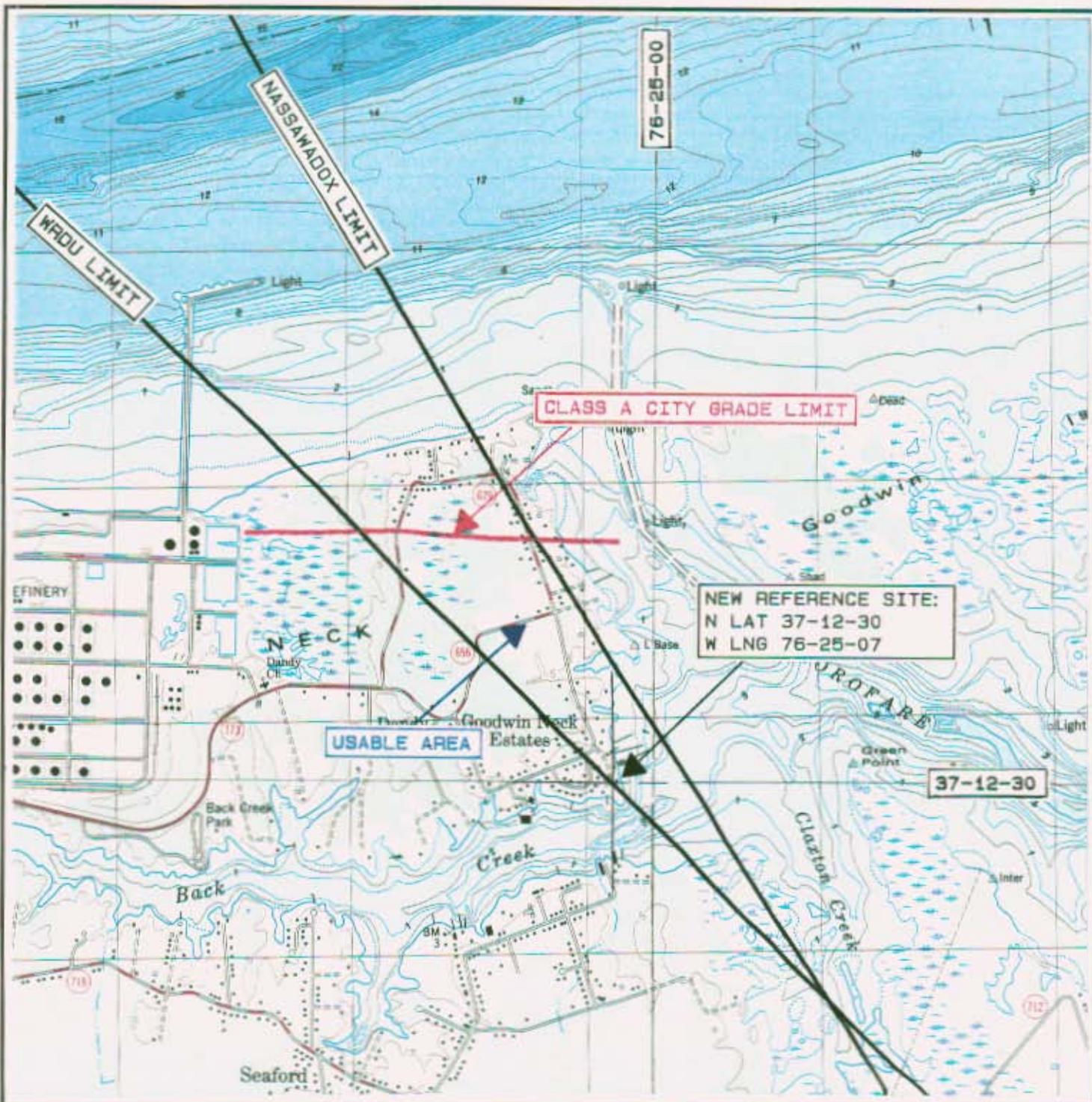
**TECHNICAL COMMENTS**  
**MB DOCKET #02-76**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC.**  
**ALLOT CHANNEL 291A**  
**POQUOSON, VIRGINIA**  
**July 2002**

**EXHIBIT #3**

ALLOCATION STUDY FOR POQUOSON, VIRGINIA  
 USING ALTERNATE REFERENCE SITE

REFERENCE		DISPLAY DATES
37 12 30 N	CLASS A	DATA 07-12-02
76 25 07 W	Current rules spacings	SEARCH 07-18-02
----- CHANNEL 291 -106.1 MHz -----		

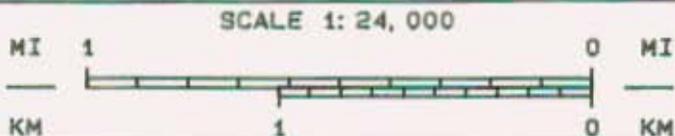
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-MI	R-KM R-MI	MARGIN (KM)
WEXM.C	291B	Exmore	VA	51.3	57.29	178.0	-120.71
CP CX	37 31 46	75 54 44	30.000 kW	81M	35.6	110.6	
	Commonwealth Broadcasting, LLC			BPH-20010502AAR			
RADD	291A	Poquoson	VA	90.0	0.05	115.0	-114.95
ADD	37 12 30	76 25 05	0.000 kW	0M	0.0	71.5	
RDEL	291A	Exmore	VA	51.3	57.29	115.0	-57.71
DEL	37 31 46	75 54 44	0.000 kW	0M	35.6	71.5	
WEXM	291A	Exmore	VA	51.3	57.29	115.0	-57.71
LIC	37 31 46	75 54 44	1.500 kW	81M	35.6	71.5	
	Commonwealth Broadcasting, LLC			BLH-20010420AAT			
WRDU	291C	Wilson	NC	225.0	225.54	226.0	-0.46
LIC CN	35 45 36	78 11 04	100.000 kW	411M	140.2	140.5	
	Capstar TX Limited Partnership			BLH-19840912CR			
WRDU.A	291C	Wilson	NC	225.0	225.54	226.0	-0.46
APP CX	35 45 36	78 11 04	100.000 kW	416M	140.2	140.5	
	Capstar TX Limited Partnership			BPH-20020529AAO			
RADD	290A	Nassawadox	VA	56.5	71.78	72.0	-0.22
ADD	37 33 43	75 44 24	0.000 kW	0M	44.6	44.8	
WRARFM	288A	Tappahannock	VA	339.9	78.76	31.0	47.76
LIC CN	37 52 27	76 43 37	6.000 kW	100M	49.0	19.3	
	Rappahannock Communications			BLH-19910812KA			
WBTJ	293B	Richmond	VA	286.6	118.01	69.0	49.01
LIC CN	37 30 14	77 41 53	7.600 kW	376M	73.3	42.9	
	Capstar TX Limited Partnership			BLED-19880808LB			
WJMOFM	289A	Richmond	VA	289.8	102.30	31.0	71.30
LIC CN	37 30 52	77 30 28	2.300 kW	162M	63.6	19.3	
	Radio One Licenses, LLC			BLH-19981023KA			
WRSF	289C1	Columbia	NC	173.4	147.44	75.0	72.44
LIC CN	35 53 18	76 13 50	100.000 kW	187M	91.6	46.6	
	East Carolina Radio, Inc.			BLH-19840316AA			



**USABLE AREA STUDY**

MAP IS A 1: 24, 000 SCALE U.S.G.S.  
 TOPGRAPHIC MAP "POQUOSON WEST,  
 VIRGINIA"

**EXHIBIT #4**  
 TECHNICAL COMMENTS  
 MB DOCKET #02-76  
 COMMONWEALTH BROADCASTING  
 SINCLAIR TELECABLE, INC.  
 POQUOSON, VIRGINIA  
 July 2002



**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

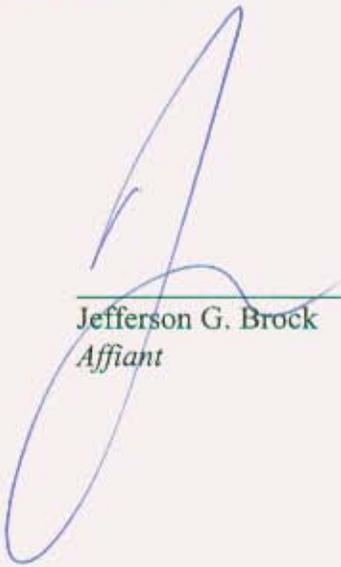
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

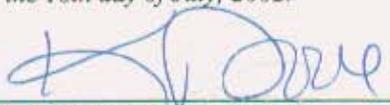
*This the 18th of July, 2002*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 18th day of July, 2002.*



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*Notary Public, State of Georgia  
My Commission Expires: April 16, 2006*

## **EXHIBIT NO. 2**

**Declaration of L. Joseph Hardin**

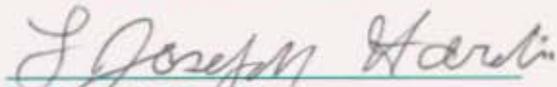
**DECLARATION OF L. JOSEPH HARDIN**

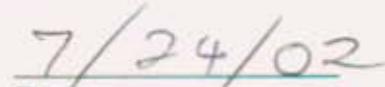
I, L. Joseph Hardin, am employed by Commonwealth Broadcasting, LLC and Sinclair TeleCable, Inc., as Chief Engineer for stations WNIS, WTAR, WROX-FM WKOC and WEXM. I have been active in the radio and TV broadcasting industry for 39 years. I hold an FCC General Telephone License (#PG5-7363).

Under the direction of Graham Brock, Inc., I visited the proposed allocation site for Channel 291A at Poquoson, Virginia, to verify the location of the reference point. Using a Garmin Global Positioning System ("GPS") receiver, Model ETREX (see attached), I have determined the following:

The geographic coordinates of the site, as measured with the GPS receiver, are North Latitude 37°12'30.5" and West Longitude 76°29'03.8" (NAD 1983). Using the NADCON program, the coordinates converted to NAD 1927 and North Latitude 37°12'30.0" and West Longitude 76°29'05.0". The site is located on land, with a sufficient buffer of land between the site and the water line. I have attached photographs of myself at the proposed reference site, clearly showing that the reference point is on land.

I declare the foregoing under penalty of perjury.

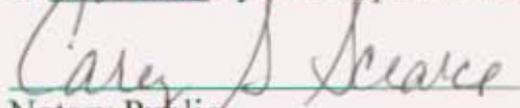
  
L. Joseph Hardin

  
Date

**Certificate of Acknowledgment:**

City Norfolk  
Commonwealth of Virginia

The foregoing instrument was acknowledged before me this 24<sup>th</sup> day of July, 2002 by L. Joseph Hardin.

  
Notary Public

My commission expires: 9/30/05



# eTrex personal navigator

owner's  
manual



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Part Number 190-00205-00 Rev. B

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**Let the Fun Begin**

**fun (noun):**

1. A source of enjoyment, amusement, or pleasure.
2. Employment, amusement, have fun at the party.
3. Playful, often noisy, activity.

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