The Mars Hill Network
Ministering Life

The heavens declare the glory of God,
and the firmament sheweth his handiwork.
Day unto day uttereth speech, and
night unto night sheweth knowledge."
Psalm 19:1-2 (KJV)

"CHRISTIAN RADIO FROM THE MARS HILL NETWORK"

November 18, 2008

To: Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

WMHR
102.9 FM
Syracuse

WMHI
94.7 FM
Cape Vincent
Watertown
Kingston, Ontario

WMHN
89.3 FM
Webster
Rochester

WMHQ
90.1 FM
Malone/Massena
Cornwall, Ontario

Re: Response to Public Notice MM Docket No. 99-325

It is the desire of Mars Hill Broadcasting Co. of Syracuse, N.Y. to respond to the Public Notice MM Docket No. 99-325 regarding the increase of the maximum permissible digital operating power of FM stations from 1 percent to 10 percent of the stations authorized analog power. In consideration of the 400 kHz bandwidth required of the iboc digital signal we find it difficult to co-exist with both the analog and digital signals. Based on our experience with the present status of 1 percent digital power and the resultant interference we find such an increase to be quite detrimental to listeners.

Case In Point:
Our analog station at Cape Vincent, N.Y. operating at 94.7 MHz is being interfered with the sideband of the digital signal of WYYY , 94.5 MHz, of Syracuse, N.Y. whose analog power is 100 Kw and the digital signal is 1 Kw. WYYY is a class B station with a grandfathered 100 Kw analog signal and the digital signal apparently follows the rule. This station, which is approximately 71 miles distant from the Cape Vincent station (WMHI) is removing approximately one fourth of the listener coverage area now and an increase of 10 dB would affect the coverage significantly.

The normal edge of the coverage area of WMHI is approximately 37 miles from its source and field strength measurements of WYYY at this point is 52.3 dBuv/m with its sideband being 34.7 dBuv/m. which is at the center frequency of WMHI at 94.7MHz. The sideband of WYYY at the 60 dB contour of WMHI is presently measured to be about 30dBuv./m. which tells us the severity of a 10 dB increases of the interference. Thus, to have both analog and digital iboc signals co-existing with a 10 dB increase in the iboc sideband would be very problematic to analog coverage.

STATE OF NEW YORK
CLAYTON ROBERTS
No. 044447-1
LICENSED PROFESSIONAL ENGINEER

Yours truly,

Clayton Roberts, President, Mars Hill

Mars Hill Broadcasting Co., Inc. 4044 Makyes Road, Syracuse, NY 13215-8683
(315) 469-5051 • (800) 677-1881 www.marshillnetwork.org