

BEFORE THE OHIO POWER SITING BOARD

In The Matter Of:)	
)	
The Application of American Transmission)	
Systems, Incorporated for a Certificate of) Case No. 11-4152-EL-B	SB
Environmental Compatibility and Public)	
Need for the Construction of the Fulton)	
Substation)	

COMMENTS REGARDING THE APPLICATION SUBMITTED ON BEHALF OF EDUCATIONAL MEDIA FOUNDATION

Applicant American Transmission Systems, Incorporated ("ATSI"), a subsidiary of FirstEnergy Corp., has proposed the construction of a new 345 kV to 138 kV substation to be known as the Fulton Substation located near the intersection of Township Road 3 and County Road J in Fulton Township, Fulton County, Ohio. The proposed locations for the Fulton Substation are located southeast of the intersection of Township Road 3 and County Road J and north of Interstate 80/90, immediately adjacent to the existing Allen Junction-Midway 345 kV Transmission Line in Fulton Township, Fulton County, Ohio.

On or about October 12, 2012, Educational Media Foundation (EMF) received Notice of the pendency of the Application and of a nonadjudicatory hearing, pursuant to Section 4906.08(C), Revised Code, to be held on Tuesday, November 13, 2012 at the Valleywood Golf Club, 13501 Airport Highway, Swanton, Ohio 43558. The Notice further provides that comments on the Application could be submitted either orally or in writing. Since EMF is headquartered in California and will not be able to attend the hearing, EMF submits the

 following written comments:

EMF is a non-profit, 501(c)(3) corporation organized under the California Nonprofit Religious Corporation Act. EMF is licensed to do business in Ohio and owns and operates a 107.9 meter (354 foot) guyed broadcast tower (ASRN 1229323) (the "Tower") located approximately two-tenths mile East of the North Star Steel tap connection point near the proposed site of the Fulton Substation. EMF is licensed by the FCC to operate non-commercial educational radio stations throughout the United States, including FM radio station WNKL 96.9 FM, Wauseon OH (Federal Communications Commission ID Number 78441). WNKL is a 5000 watt FM radio station broadcasting from the Tower via a directional antenna located 341 feet above ground. At the base of that tower is an equipment shelter housing EMF's sensitive electronic equipment.

EMF is of the current belief that the height of WNKL's antenna, the proposed maximum structure height (86 feet), and the distance between the Tower and the Preferred Site and Alternate Site, make it unlikely that the Fulton Substation will negatively impact EMF's broadcast and tower operations. As a result, EMF has no immediate objection to the siting of either the Preferred Site or the Alternate Site. However, EMF reserves the right to reconsider its position and assert an objection at a future point in these proceedings should it determine that it is in its best interest to do so.

As noted earlier, the equipment shelter at the base of the Tower contains sensitive electronic equipment used in connection with EMF's broadcast operations. While we believe this equipment is sufficiently removed from the Preferred Site and the Alternate Site that its operation will not be impacted by the presence of the substation; the possibility exists that the substation may cause interference to, and a degradation of EMF's broadcast signal or may

otherwise have a negative impact on EMF's equipment and operations. In that event, EMF would expect to work cooperatively with Applicant to mitigate such effects at Applicant's expense. Accordingly, EMF requests that any Order entered in this proceeding contain a provision requiring the Applicant to bear the expense of mitigating any interference or deleterious impact to the WNKL's equipment and/or signal resulting from the substation and transmission lines contemplated in the Application.

Respectfully submitted,

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CERTIFCATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments Regarding the Application Submitted on Behalf of Educational Media Foundation" was served upon the following persons by sending a copy by regular mail, postage prepaid on October 26, 2012, to the following addresses:

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