

ENGINEERING REPORT

**FM Translator Minor Modification To
Granted Construction Permit
K246CG**

BMPFT-20130325AIW – Las Cruces, NM
Facility ID No. 148434

May 2014

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(Exhibit numbering is in response to FCC Online Form 349, Section III-A)

DISCUSSION OF REPORT

On March 17, 2003 Family Life Broadcasting System ("FLBS"), submitted BNPFT-20030317KWJ application for a new FM Translator in Las Cruces, New Mexico. Pursuant to Public Notice DA 13-233 (Report Number AUC-03-83-D) and its Attachment B, FLBS filed its "Long Form" application (BNPFT-20130325AIW), which was recently granted. The granted Construction Permit specified operation on CH246D (97.1 MHz.) with 0.050 kW of non-directional power at an antenna at 1,234 meters CORAMSL. This application for a minor modification of the Construction Permit proposes to change its location, height, effective radiated power and utilize a directional transmitting antenna. The proposed FM operating specifications are listed in **Exhibit 12.1**. The Antenna Structure Registration is shown in **Exhibit 12.2**. A comparison of the 60 dBu f[50,50] contours of the recently granted Construction Permit as well as those pertaining to this minor modification are shown in **Exhibit 12.3**.

Pursuant to Public Notice DA 13-283, this application proposes parameters more than 39 km from any Appendix A Market Grid. Therefore submittal of a supplemental LPFM Grid Test Showings is not required. Additional, the site is not located within any "out-of-grid" Top-50 Spectrum Limited Market Boundaries. Therefore, no supplemental Top-50 transmitter site test showings are required.

The Tabulation of Allocations as of May 28, 2014 is shown in **Exhibit 13.1**. It shows that the modified translator will not give interference to any existing FM broadcast station, facility or application. There are three (3) facilities, existing or proposed, close enough to warrant additional studies. Contour protection studies have been provided showing the lack of given interference to 2nd adjacent (CH248C) KBNA-FM, El Paso, Texas (**Exhibits 13.2a & 13.2b**), 2nd adjacent (CH244D) application number BNPFT-20130311ACN for Las Cruces, New Mexico (**Exhibit 13.3**) as well as 1st adjacent (CH245B) Mexican Allocation Facility ID Number 94398, in Las Paloma (**Exhibit 13.4**).

The proposed Translator is 57.5 km from the international border of Mexico. Compliance with the Agreement between the Government of the United States of America and the Government of the United Mexican States Relating to the FM Broadcast Service in the Band 88-108 for "Low Power FM Stations" is shown in **Exhibits 13.5a, 13.5b and 13.5c**.

Since the TV Channel 6 protection provisions of CFR §73.525 apply only to facilities on Channels 200-220, and this application pertains to an FM Translator facility on Channel 246, no TV Channel 6 protection is warranted.

The proposed FM Translator facility will not produce human exposure to radiofrequency radiation in excess of the safety standards specified in §1.1307(b)(3) of the Commission's rules concerning RF contributors of less than 5% as shown in **Exhibit 17**.

In the event work would be required in proximity to the antenna so that the person(s) working in the area would be potentially exposed to fields in excess of the guidelines set forth in OET Bulletin No. 65 (Edition 97-01), the transmitter power will be reduced or the station will cease operation during the critical period.

The FCC NGDC 30 second terrain database was utilized for all allocation, contour and HAAT calculations contained in this Application.