

Exhibit 17 - Statement A  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Board of Trustees of the University of Arkansas**  
KLRE-FM (Aux) Little Rock, Arkansas  
Facility ID 37788  
Ch. 213C2 40 kW 75 m

*Board of Trustees of the University of Arkansas* (“UALR”), licensee of FM radio station KLRE-FM (Ch. 213C2, Little Rock, AR), herein seeks to correct a discrepancy between this station’s licensed coordinates and the actual tower location.<sup>1</sup> No construction or operational change is proposed.

UALR utilizes a circularly polarized FM antenna located at 75 meters above average terrain with an effective radiated power (“ERP”) of 40 kW. Because no construction will take place, there will be no change to the overall tower height or marking and lighting requirements. As shown in **Exhibit 17 - Figure 1**, the principal community of Little Rock will continue to be encompassed by the proposed facility’s 60 dBμ contour.

A preliminary allocations study revealed that the following facilities required further study:

Call	Channel	Location		Azi	Dist
KNLL	LIC-D 213C1	Nashville	AR	222.1	174.4
KANX	LIC-D 216C2	Sheridan	AR	200.5	45.7
KNFR	LIC-D 215A	Gravel Ridge	AR	31.3	42.9
KLMK	LIC-D 214C2	Marvell	AR	92.4	123.0
KZTS	LIC-Z 266A	Cammack Village	AR	310.3	21.2
KEAF	LIC-D 214C0	Fort Smith	AR	294.1	135.4

With the exception of KANX(FM)(Ch. 216C2, Sheridan, Arkansas), there is no prohibited contour overlap with the facilities listed above. The pertinent contour locations are shown in **Exhibit 17 - Figures 2 – 4** and the detailed-view provided in **Exhibit 17 - Figure 5**. All maps depict the licensed KLRE-FM contour locations with solid lines and the coordinate-corrected contour locations with dashed lines. KZTS(FM) (Ch. 266A Cammack Village, AR) has an intermediate frequency channel relationship and meets the minimum 15 kilometer distance spacing requirement specified in §73.207, Table A, of the FCC Rules.

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<sup>1</sup> See Antenna Structure Registration (“ASR”) number 1047396.

Exhibit 17 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(page 2 of 4)

The change in coordinates results in a slight increase in separation distance to KANX. Further, as detailed by the dashed red lines in **Exhibit 17 - Figure 5**, the slight existing contour overlap is virtually eliminated following the coordinate correction. Further, there is no population<sup>2</sup> within the proposed reduced overlap area.

The contours were plotted using the actual ERP and height above terrain along each radial for each facility, as specified in §73.509(c). For the facilities under study, the antenna elevation above mean sea level, geographic coordinates, and ERP (including directional antenna relative field values, where appropriate) were retrieved from the FCC's engineering database. The requisite contours were determined using U.S.G.S. 3 arc-second digitized terrain data along each radial of interest from each transmitter site and an implementation of the Commission's TVFMFS computer program, which simulates the FM propagation curves.

### **TV Channel 6 Considerations**

Under §73.525(a)(1), an affected TV Channel 6 station must be considered with a proposed non-commercial educational facility on Channel 213 if the distance between the respective transmitter sites is 193 km or less. A search of the Media Bureau's engineering database revealed no domestic, full-service Channel 6 facilities within that distance.<sup>3</sup>

### **Other Coordination Considerations**

According to data extracted from the FCC Media Bureau's database, there is only one AM station, KLRG (880 kHz, Sheridan, Arkansas), with a transmitter site located within 3.2 km of the KLRE-FM facility. KLRG utilizes two transmitter sites. The site nearer to KLRE-FM is located at a distance of 2.3 kilometers, is non-directional, and is authorized for use during daytime and critical hours. The second KLRG site is located at a distance of 41 kilometers from KLRE-FM and operates with a directional antenna during night hours. Therefore, the KLRG daytime non-directional and

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<sup>2</sup> Based on the locations of Census 2010 population centroids.

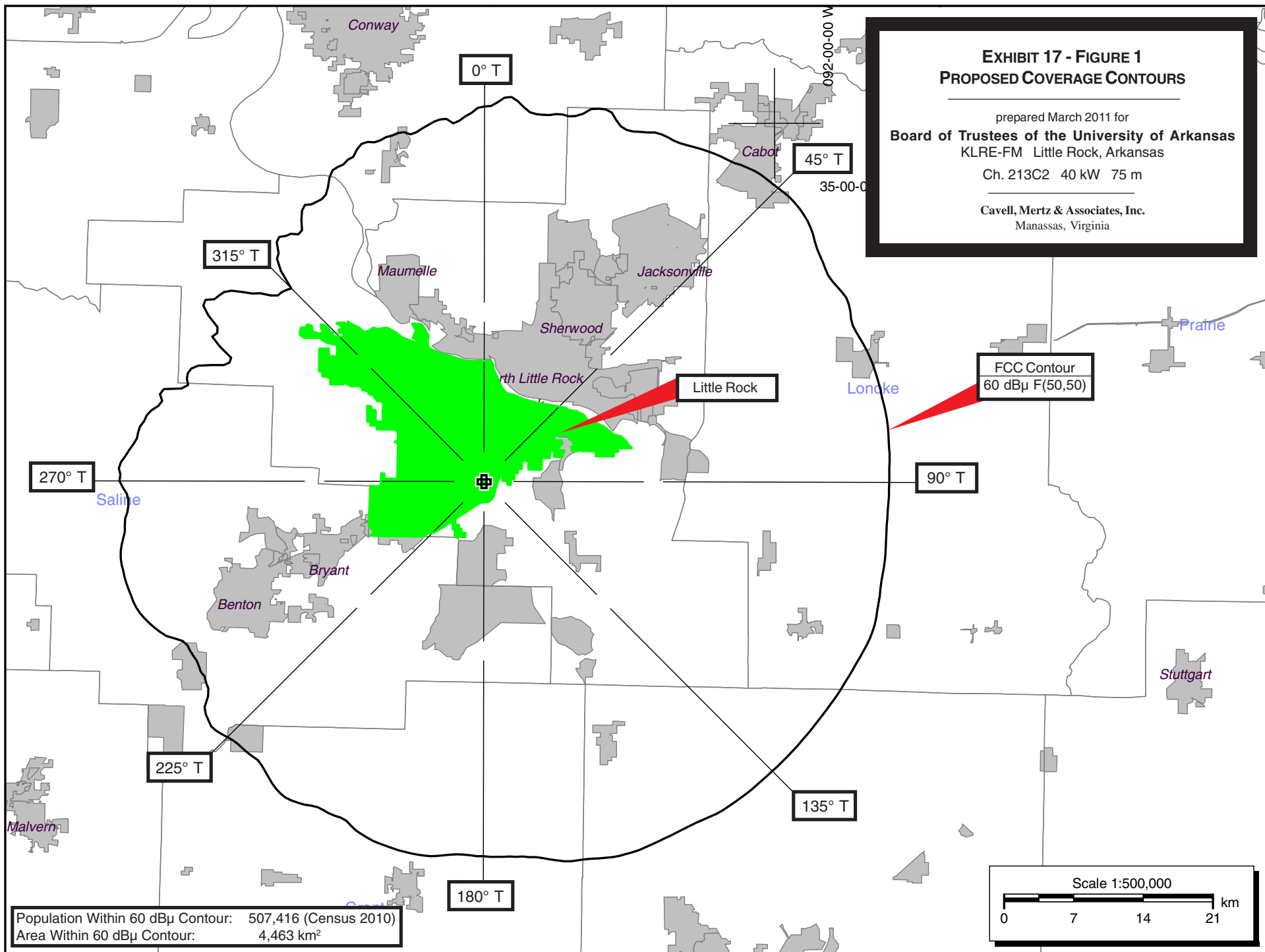
<sup>3</sup> The nearest Channel 6 facility is KZTE-LP, Texarkana, Texas, which is located at a distance of 217 km.

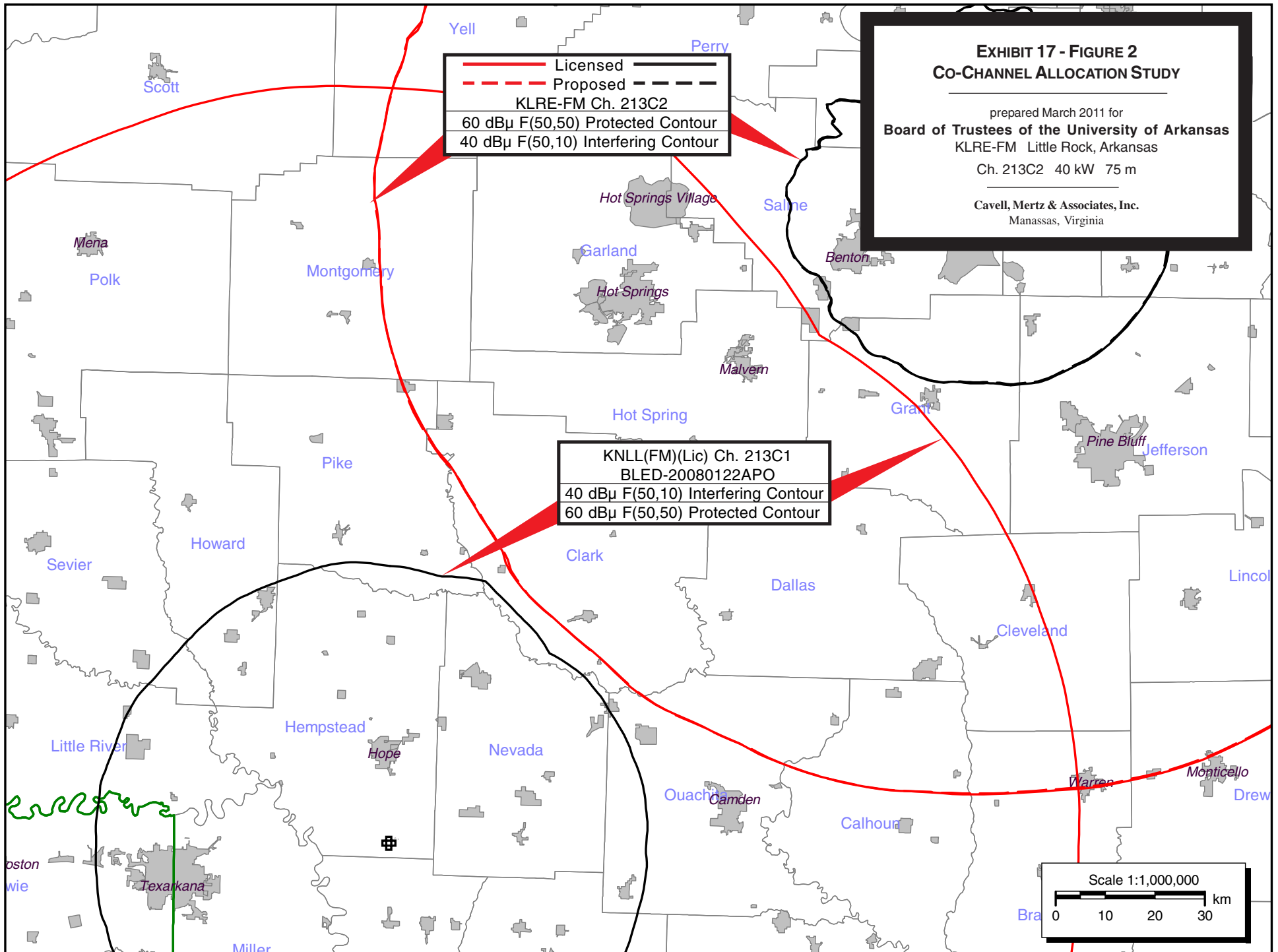
Exhibit 17 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(page 3 of 4)

nighttime directional operations are located at distances that exceed the requirements of §73.1692 and do not require coordination.

The nearest FCC monitoring station is at Powder Springs, Georgia, at a distance of 705 km from the proposed site. The proposed site exceeds by a great margin the minimum distance specified in §73.1030(c)(3)(iii) that would suggest consideration of the monitoring station.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.





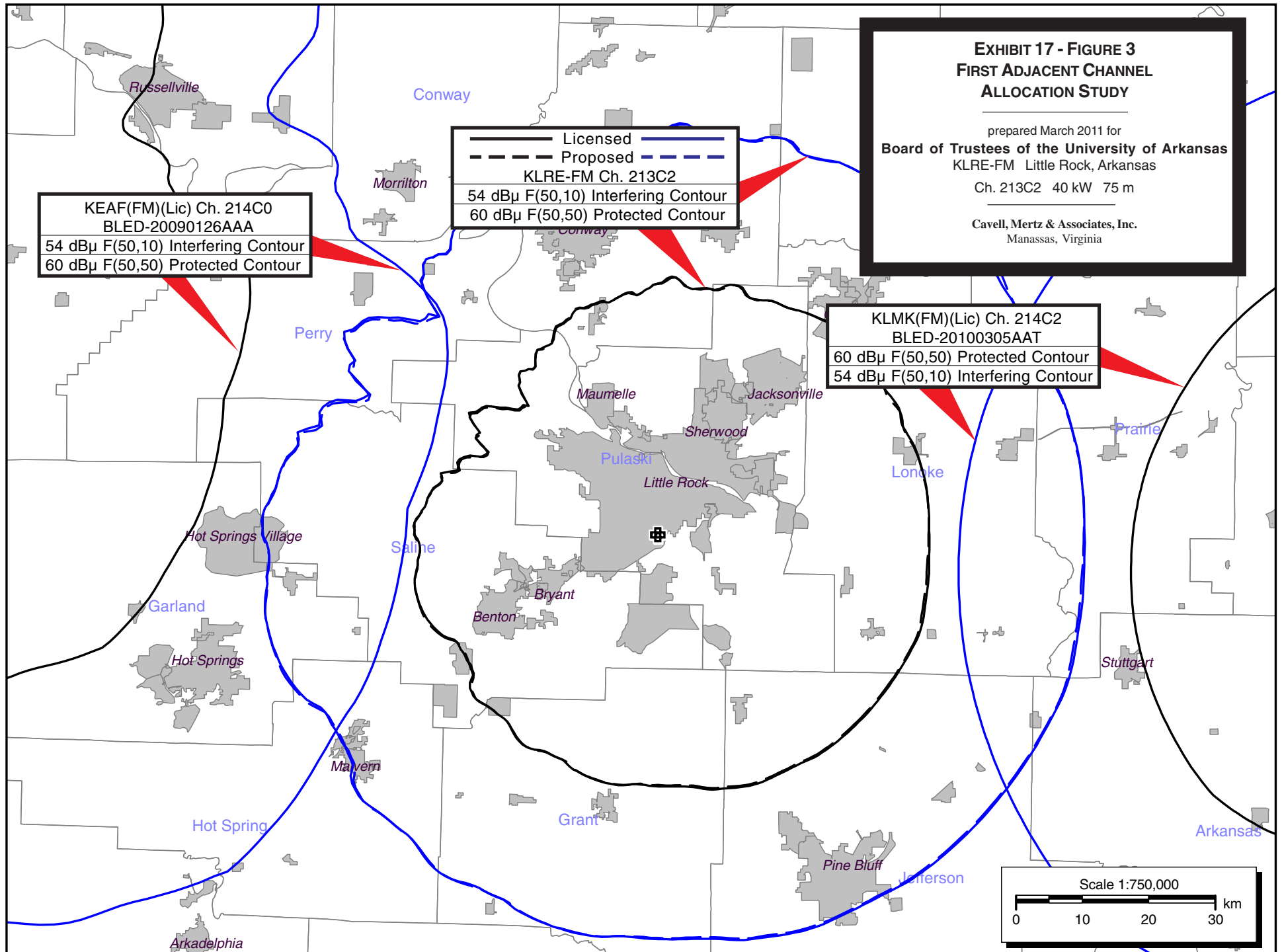
**EXHIBIT 17 - FIGURE 3**  
**FIRST ADJACENT CHANNEL**  
**ALLOCATION STUDY**

prepared March 2011 for  
**Board of Trustees of the University of Arkansas**  
KLRE-FM Little Rock, Arkansas  
Ch. 213C2 40 kW 75 m  
Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

— Licensed — Proposed —  
KLRE-FM Ch. 213C2  
54 dB $\mu$  F(50,10) Interfering Contour  
60 dB $\mu$  F(50,50) Protected Contour

KLMA(FM)(Lic) Ch. 214C2  
BLED-20100305AAT  
60 dB $\mu$  F(50,50) Protected Contour  
54 dB $\mu$  F(50,10) Interfering Contour

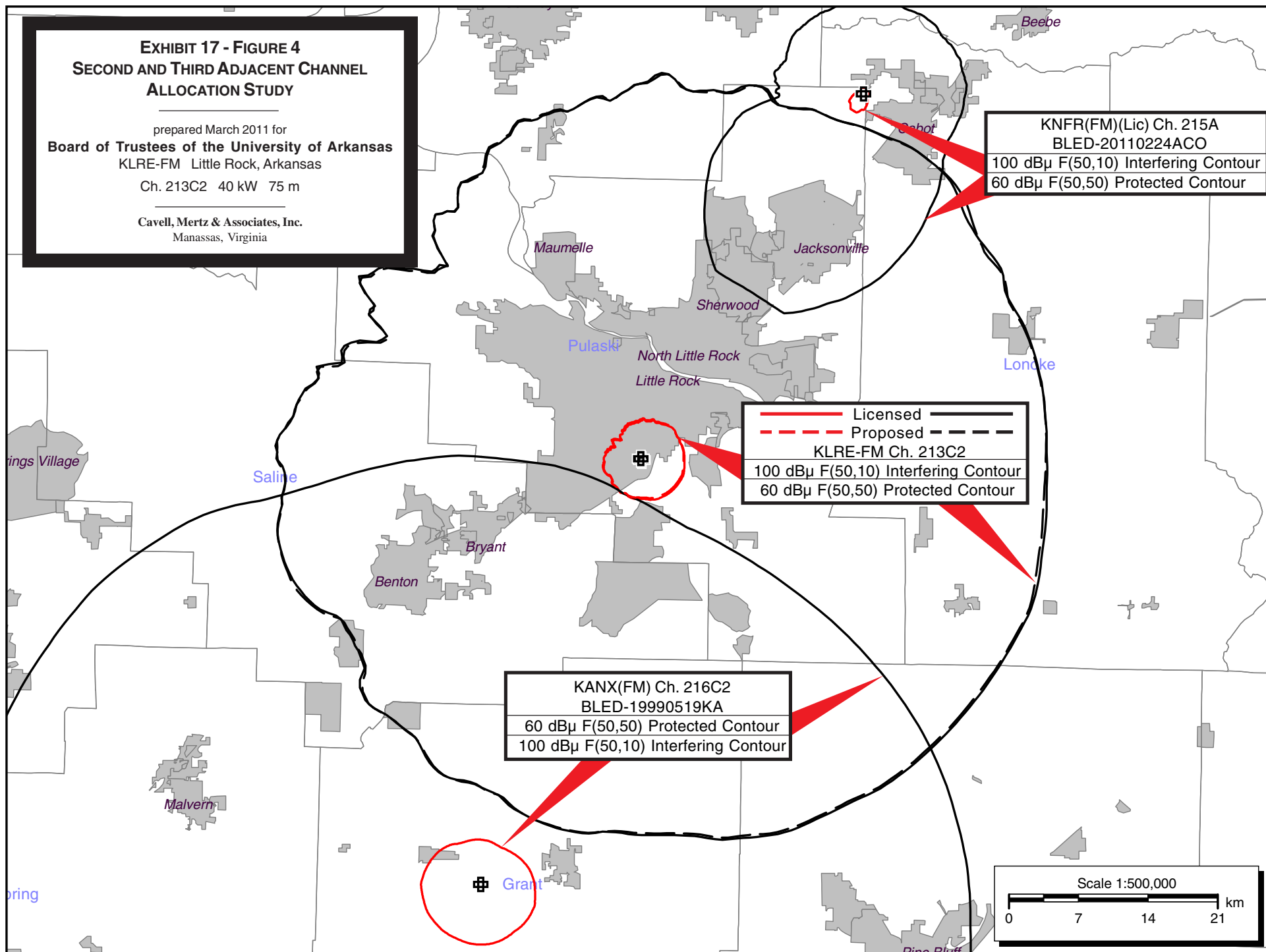
KEAF(FM)(Lic) Ch. 214C0  
BLED-20090126AAA  
54 dB $\mu$  F(50,10) Interfering Contour  
60 dB $\mu$  F(50,50) Protected Contour



**EXHIBIT 17 - FIGURE 4**  
**SECOND AND THIRD ADJACENT CHANNEL**  
**ALLOCATION STUDY**

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KLRE-FM Little Rock, Arkansas  
Ch. 213C2 40 kW 75 m

Cavell, Mertz & Associates, Inc.  
Manassas, Virginia



**EXHIBIT 17 - FIGURE 4**  
**THIRD ADJACENT CHANNEL**  
**ALLOCATION STUDY - DETAIL VIEW**

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Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

KLRE-FM (Corrected) Site  
KLRE-FM (Lic) Site

—	KLRE-FM (Lic) BLED-19830801AH 100 dBμ F(50,10)
- - -	KLRE-FM (Corrected) 100 dBμ F(50,10)

KANX(FM) Ch. 216C2  
BLED-19990519KA  
60 dBμ F(50,50) Protected Contour

Scale 1:50,000  
0 0.7 1.4 2.1 km