

Exhibit 15 - Statement A
ALLOCATION CONSIDERATIONS
prepared for
Board Of Trustees Of The University Of Arkansas
KUAR (FM) Little Rock, Arkansas
Facility ID 4296
Ch. 206C1 56 kW 342 m

Board Of Trustees Of The University Of Arkansas (“*University*”) is the licensee of non-commercial educational radio station KUAR(FM) (Ch. 206C1, Little Rock, Arizona, FCC file number BLED-19910502KA). KUAR is licensed to operate with 74 kW effective radiated power (“ERP”) horizontally polarized, 100 kW ERP vertically polarized, and an antenna height above average terrain (“HAAT”) of 269 meters using a non-directional antenna. The instant application seeks authorization to move the transmitting antenna to a nearby tower at a higher antenna elevation along with a commensurate reduction in ERP.

Nature of the Proposal

The instant application specifically seeks authorization to operate its main facility at 56 kW ERP using a circularly polarized antenna mounted at 342 meters HAAT. The proposed transmitter facility will utilize an existing support structure (Antenna Structure Registration number 1263739). No change to the structure’s overall height is proposed.

The proposed transmitting antenna is an ERI model SHPX-12AC omni-directional antenna. The attached **Exhibit 15 – Figure 1** supplies a coverage contour map for the proposed facility. This map includes the boundaries of Little Rock, KUAR’s principal community. As demonstrated in **Exhibit 15 – Figure 1**, the community of Little Rock is completely enclosed by the 60 dBμ contour, thus satisfying the requirement of §73.515. Since the proposed transmitter site is very close to that of the KUAR licensed site, there is 60 dBμ contour overlap as demonstrated in **Exhibit 15 – Figure 2**, thus satisfying §73.3573(a)(1) of the Rules.

A listing of the pertinent surrounding FM facilities that may require study in regard to prohibited overlap under §73.509 of the Commission’s Rules is provided in **Exhibit 15 – Table I**.

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The attached **Exhibit 15 – Figure 3** depicts the pertinent protected and interfering contours of the co-channel and first adjacent stations listed along with the proposed facility. 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-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. The F(50,10) curves are used to calculate distance to interfering contours, however if the distance is less than 16 km the F(50,50) curves are used, as specified by §73.509(c)(2). As demonstrated in **Exhibit 15 – Figure 3**, there is no prohibited overlap between the proposed facility and pertinent co-channel or first adjacent facilities.

Exhibit 15 – Figure 4 illustrates that there is no prohibited overlap between the proposed facility and pertinent second and third adjacent channel facilities, including a number of other applications from the October, 2007 NCE filing window. **Exhibit 15 – Figure 4A** provides a detailed view of the protection demonstrating that no prohibited overlap will occur to a proposed facility at Hot Springs, Arkansas (file number BNPED-20071019ACL). To supplement the contour protection, **Exhibit 15 – Table II** has been prepared to tabulate the calculations between the proposed KUAR and the New(FM) application at Hot Springs, Arkansas. As demonstrated by the tabulation, all points along the 100 dBμ contour for the Hot Springs facility lie outside the KUAR proposed 60 dBμ contour. In fact, the KUAR license and the proposal’s 60 dBμ contour does not extend beyond that of the Licensed KUAR 60 dBμ contour in the direction of Hot Springs.

Considering the close proximity of the Hot Springs application contour to the KUAR licensed contour, extra effort was taken to maintain the same contour spacing relationship between the two facilities in the instant application. The highlighted portion of the tabulation, ranging from 20 through 40 degrees azimuth from the Hot Springs facility, was calculated for every degree of azimuth

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since this portion of the contour is closest to the KUAR 60 dBμ contour. As demonstrated by the tabulation, there is no prohibited overlap by the proposal.

A spacing study was performed as required by §73.507(c)(1) (regarding facilities differing in frequency by 10.6 or 10.8 MHz from the proposal). The proposed facility meets the minimum distance separation requirements of §73.207 in all such instances. The nearest domestic Channel 259 station is a translator application at Malvern, Arkansas, at a distance of 68.9 km. The nearest domestic Channel 260 station is KWCK-FM, Searcy, Arkansas, at a distance of 87.4 km.

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 206 if the distance between the respective transmitter sites is 211 km or less. Within a 211 km radius of the proposed facility, the only full service TV Channel 6 facility is that of KEMV(TV), Mountain View, Arkansas (BLET-19800903KE), at a distance of 114.2 km.

On April 1, 2009, the Commission issued a Public Notice to clarify its policies with regard to NCE proposals and Channel 6 protection. According to the Public Notice, an NCE proposal, “must submit either a showing regarding predicted interference or a copy of an agreement between such applicant and the affected Channel 6 station, ‘concurring with the proposed NCE-FM facilities.’”¹ Accordingly, University has obtained an unconditional letter of concurrence from the affected station. A copy of that letter is attached as **Exhibit 19 – Attachment 1**. Consequently, the proposed operation fully complies with the protection of TV Channel 6 facilities as specified in §73.525.

FCC Monitoring Stations and Other Broadcast Facilities

The nearest FCC monitoring station is located at Powder Springs, GA and is 722.1 km distant. This exceeds, by a great margin, the threshold minimum distance specified in

¹ Public Notice “*Media Bureau Provides Guidance to NCE FM Stations Regarding Television Channel 6 Protection Requirements*”, DA 09-744, April 1, 2009.

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§73.1030(c)(3)(iv) that would suggest consideration of the monitoring station. The proposed site is also located outside the bounds of the coordination distances specified in §73.1030(a)(1) and 73.1030(b)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia or Table Mountain, Colorado, is not required. The proposed facility is not located within 3.2 km of any AM broadcast facility.

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.

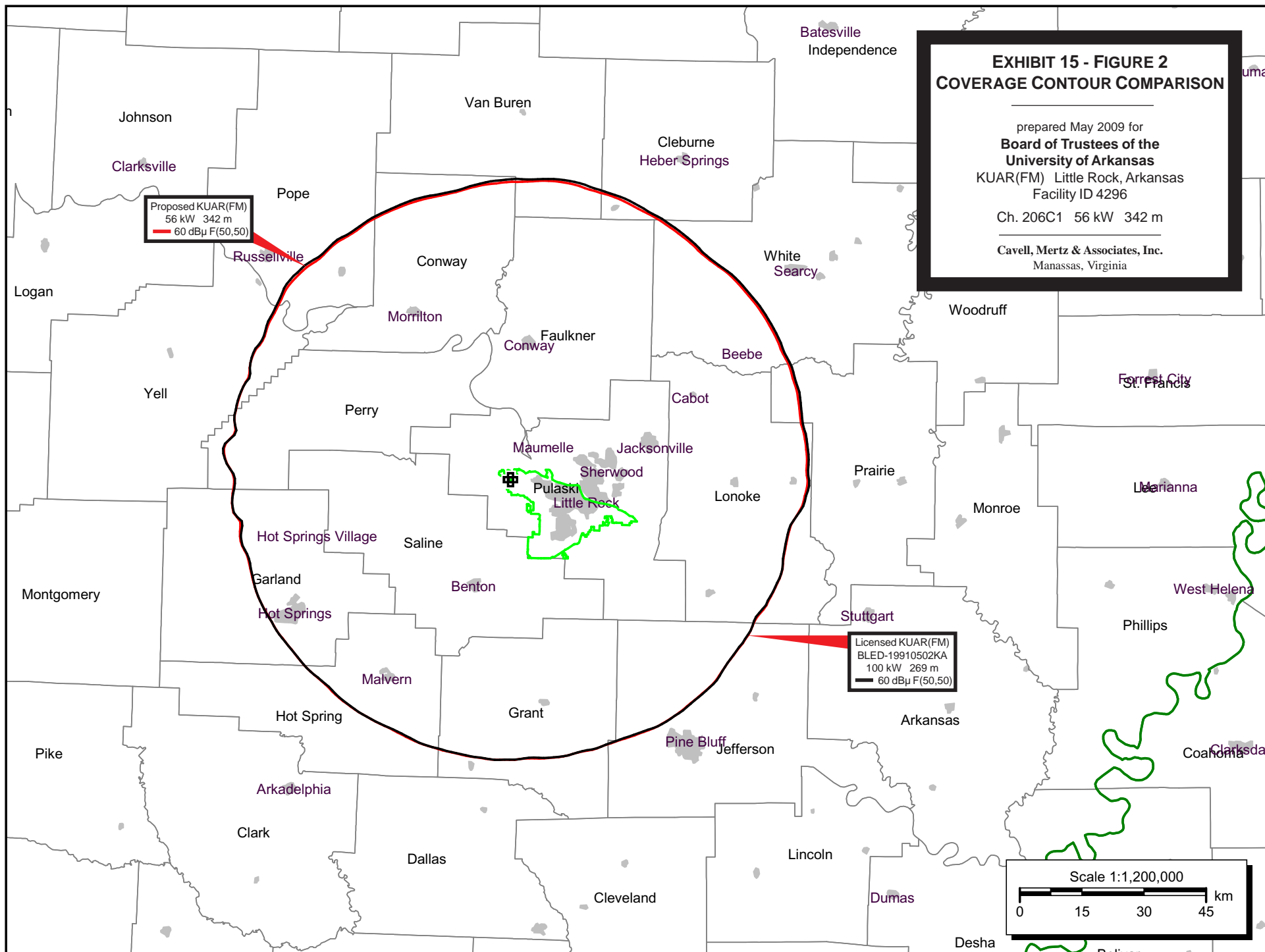


Exhibit 15 - Table I
ALLOCATION SPACING SUMMARY FOR KUAR(FM)
 prepared for
Board Of Trustees Of The University Of Arkansas
 KUAR(FM) Little Rock, Arkansas
 Facility ID 4296
 Ch. 206C1 56 kW 342 m

Channel Status	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing
206C1 LIC	KUAR FM	LITTLE ROCK, AR BLED-19910502KA	4296	34 47 50 92 29 26	100 269	0.16 281.47
207C1 CP	NEW FM	BANKS, AR BNPED-20071022BRW	177200	33 37 24 92 05 38	60 69	135.17 164.33
204C1 APP	NEW FM	HOT SPRINGS, AR BNPED-20071019ACL	175879	34 24 14 93 07 14	20 259	72.52 233.09
205C2 APP	NEW FM	CALICO ROCK, AR BNPED-20071019AQS	175285	36 07 36 92 07 41	3.2 215	151.14 12.36
204C2 APP	NEW FM	LAKE HAMILTON, AR BNPED-20071019ATE	173352	34 24 14 93 07 14	5 321	72.52 233.09
209C2 CP	KUAP FM	PINE BLUFF, AR BPED-20061115ADP	6113	34 14 33 92 01 02	50 81.7	75.22 144.84
206C LIC	KWFC FM	SPRINGFIELD, MO BLED-19980501KA	3681	37 12 06 92 56 33	100 342	269.94 351.46
209A LIC	KUAP FM	PINE BLUFF, AR BLED-19960220KE	6113	34 14 33 92 01 02	6 87	75.22 144.84
204C2 APP	NEW FM	RUSSELLVILLE, AR BNPED-20071015AHM	173872	35 29 41 92 53 58	5.4 380.2	85.97 334.43
205C2 APP	NEW FM	WALNUT RIDGE, AR BNPED-20071018ACN	175725	35 58 31 91 20 09	40 106.5	167.53 38.25
204C1 APP	NEW FM	VILONIA, AR BNPED-20071018AQI	175902	35 37 47 92 14 10	100 211	95.21 13.86
204A APP	NEW FM	JOPLIN, AR BNPED-20071022BSK	177431	34 34 31 93 25 42	1.6 8.64	89.52 254.26
205C2 LIC	KAKV FM	EL DORADO, AR BLED-20031125AMS	91423	33 12 30 92 42 30	26 115	177.37 186.59
208C1 LIC	KBMJ FM	HEBER SPRINGS, AR BLED-20050715AAG	87466	35 44 00 92 15 37	70 224	105.95 11.21

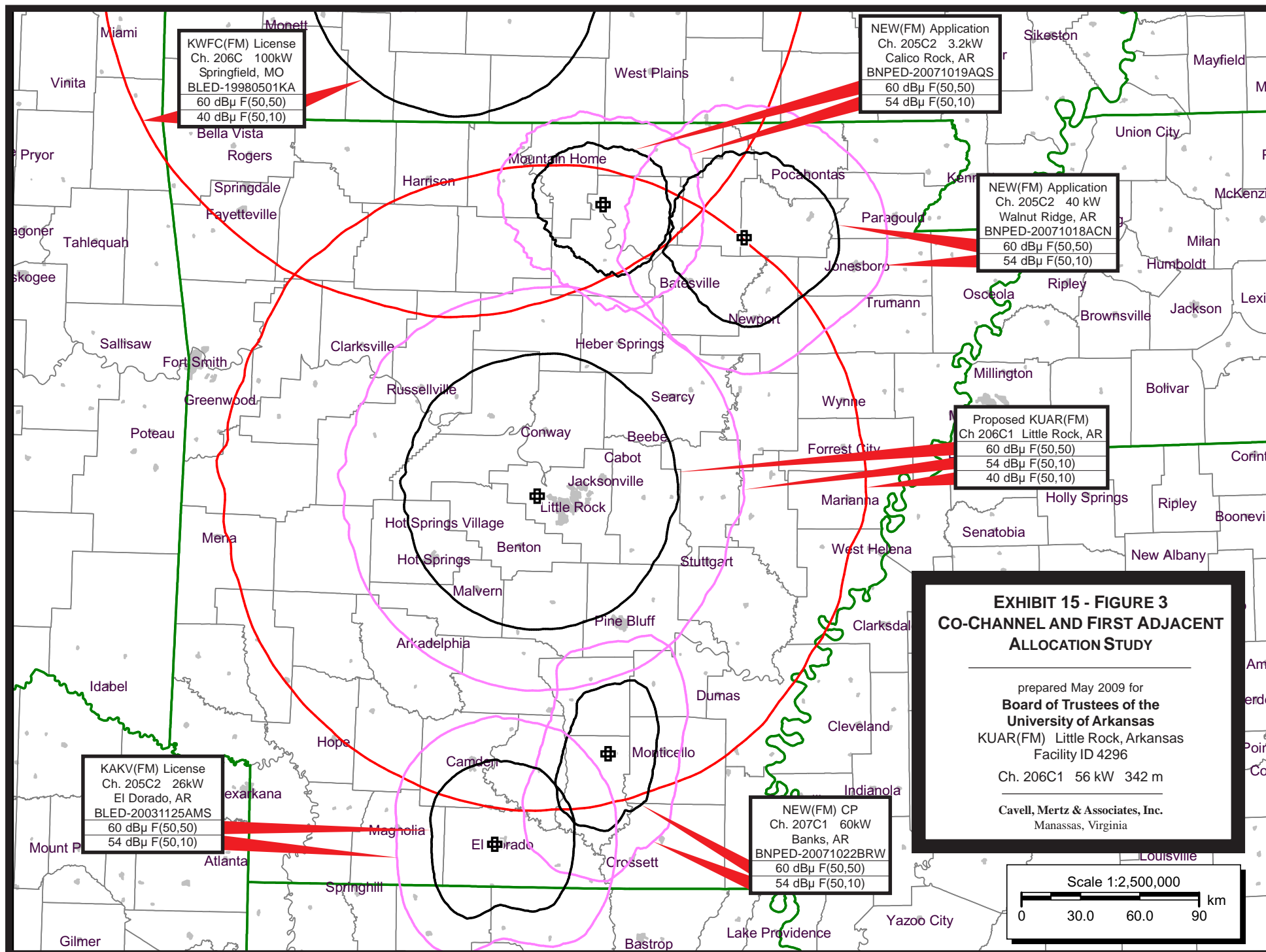


EXHIBIT 15 - FIGURE 4

2ND AND 3RD ADJACENT

ALLOCATION STUDY

prepared May 2009 for

Board of Trustees of the

University of Arkansas

KUAR(FM) Little Rock, Arkansas

Facility ID 4296

Ch. 206C1 56 kW 342 m

Cavell, Mertz & Associates, Inc.

Manassas, Virginia

KBMJ(FM) License

Ch. 208C1 70kW

Heber Springs, AR

BLER-20050715AAG

60 dBμ F(50,50)

100 dBμ F(50,10)

NEW(FM) Application

Ch. 204C1 100kW

Vilonia, AR

BNPED-20071018AQI

100 dBμ F(50,10)

60 dBμ F(50,50)

NEW(FM) Application

Ch. 204C2 5.4kW

Russellville, AR

BNPED-20071015AHM

60 dBμ F(50,50)

100 dBμ F(50,10)

Proposed KUAR(FM)

Ch 206C1 Little Rock, AR

60 dBμ F(50,50)

100 dBμ F(50,10)

NEW(FM) Application

Ch. 204A 1.6kW

Joplin, AR

BNPED-20071022BSK

60 dBμ F(50,50)

100 dBμ F(50,10)

NEW(FM) Application

Ch. 204C1 20kW

Hot Springs, AR

BNPED-20071019ACL

100 dBμ F(50,10)

60 dBμ F(50,50)

NEW(FM) Application

Ch. 204C2 5kW

Lake Hamilton, AR

BNPED-20071019ATE

100 dBμ F(50,10)

60 dBμ F(50,50)

KUAP(FM) CP

Ch. 209C2 50kW

Pine Bluff, AR

BPED-20061115ADP

100 dBμ F(50,10)

60 dBμ F(50,50)

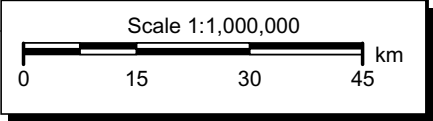


EXHIBIT 15 - FIGURE 4A
2ND AND 3RD ADJACENT ALLOCATION
DETAIL

prepared May 2009 for
Board of Trustees of the
University of Arkansas
KUAR(FM) Little Rock, Arkansas
Facility ID 4296

Ch. 206C1 56 kW 342 m

Cavell, Mertz & Associates, Inc.

Licensed KUAR(FM)
BLED-19910502KA
100 kW 269 m
— 60 dBμ F(50,50)

NEW(FM) Application
Ch. 204C1
Hot Springs, AR
BNPED-20071019ACL
100 dBμ F(50,10)

Proposed KUAR(FM)
56 kW 342 m
— 60 dBμ F(50,50)

Hot Springs

Scale 1:75,000

0 1 2 3 km

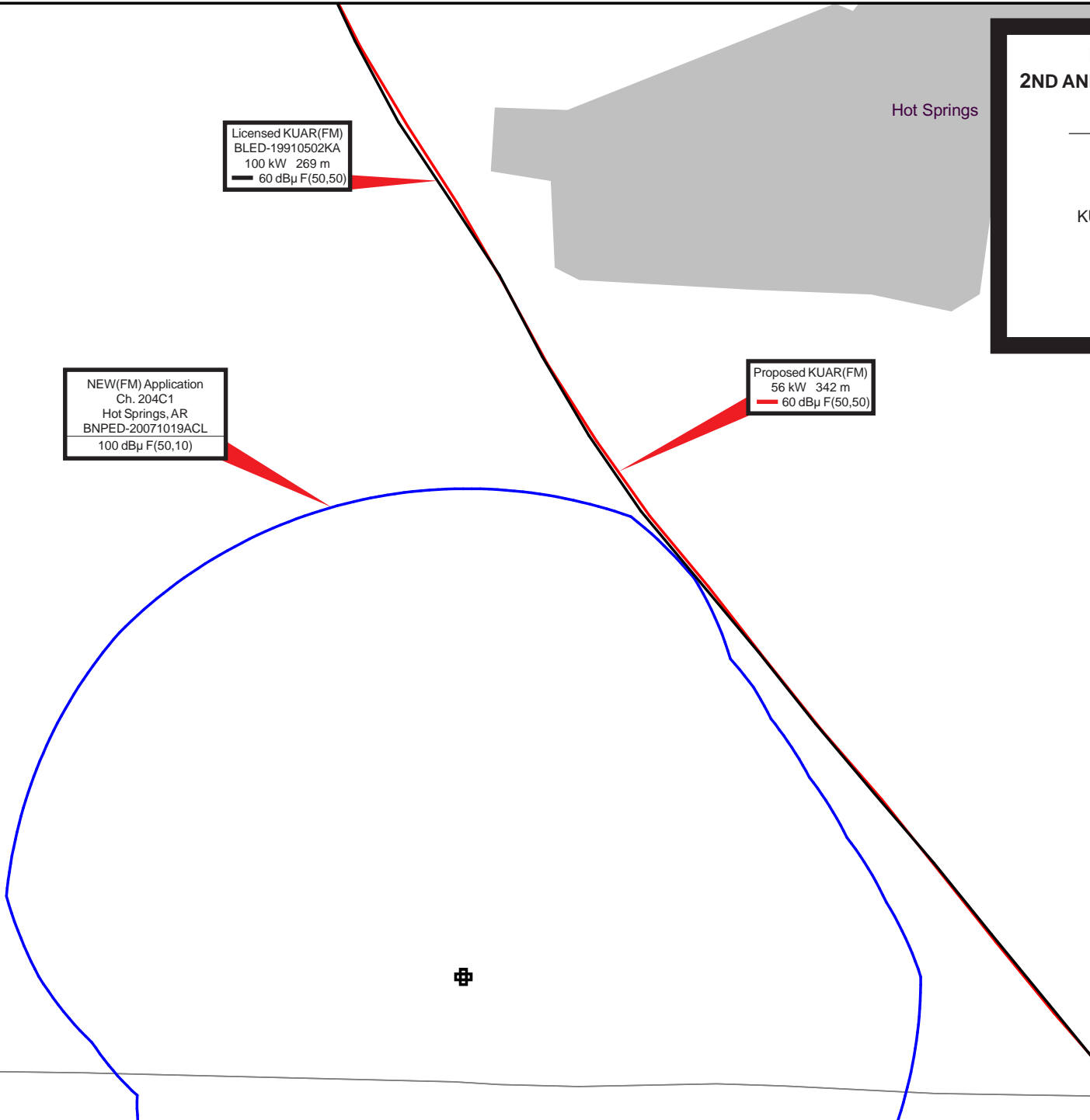


Exhibit 15 - Table II
CONTOUR OVERLAP STUDY TABULATION

prepared for
Board of Trustees of the University of Arkansas
KUAR(FM) Little Rock, Arkansas
Facility Id: 4296
Ch. 206C1 56 kW 342 m

DTC for : New FM - BNPED-20071019ACL

Fac #2 Call: KUAR Proposal

Azim (deg)	Radial Average	Antenna HAAT	Relative Field	Radial ERP	100 dBu Distance	AZ from Sta#2	Dist from Sta#2	Radial Average	Relative Field	Actual dBu	Overlap Pass/Fail
0	139.68	290.32	1.000	20.00	6.23	237.22	68.94	158.27	1.000	59.24	Pass
5	152.61	277.39	1.000	20.00	6.11	236.88	68.57	158.29	1.000	59.40	Pass
10	167.73	262.27	1.000	20.00	5.95	236.49	68.28	158.35	1.000	59.53	Pass
15	179.12	250.88	1.000	20.00	5.84	236.11	68.00	158.57	1.000	59.64	Pass
20	181.05	248.95	1.000	20.00	5.82	235.76	67.70	158.94	1.000	59.75	Pass
21	178.32	251.68	0.991	19.64	5.82	235.69	67.65	159.06	1.000	59.77	Pass
22	177.95	252.05	0.982	19.28	5.79	235.60	67.62	159.19	1.000	59.78	Pass
23	175.74	254.26	0.973	18.92	5.77	235.52	67.57	159.32	1.000	59.80	Pass
24	173.88	256.12	0.964	18.57	5.76	235.44	67.53	159.43	1.000	59.81	Pass
25	172.24	257.76	0.955	18.22	5.74	235.36	67.50	159.55	1.000	59.82	Pass
26	170.54	259.46	0.945	17.88	5.72	235.28	67.46	159.65	1.000	59.83	Pass
27	172.07	257.93	0.936	17.53	5.67	235.19	67.46	159.77	1.000	59.83	Pass
28	176.17	253.83	0.927	17.19	5.60	235.08	67.48	159.89	1.000	59.82	Pass
29	174.85	255.15	0.918	16.86	5.57	235.00	67.46	159.99	1.000	59.83	Pass
30	163.10	266.90	0.909	16.53	5.65	234.95	67.35	160.03	1.000	59.87	Pass
31	157.63	272.37	0.896	16.06	5.65	234.87	67.31	160.11	1.000	59.88	Pass
32	156.66	273.34	0.883	15.59	5.60	234.78	67.31	160.19	1.000	59.88	Pass
33	153.56	276.44	0.870	15.14	5.57	234.70	67.30	160.25	1.000	59.88	Pass
34	150.84	279.16	0.857	14.69	5.54	234.61	67.30	160.32	1.000	59.88	Pass
35	149.34	280.66	0.844	14.25	5.49	234.52	67.31	160.39	1.000	59.88	Pass
36	148.48	281.52	0.831	13.81	5.44	234.43	67.32	160.45	1.000	59.87	Pass
37	146.80	283.20	0.818	13.38	5.40	234.34	67.34	160.49	1.000	59.86	Pass
38	143.30	286.70	0.805	12.96	5.37	234.25	67.34	160.52	1.000	59.86	Pass
39	139.86	290.14	0.792	12.55	5.33	234.17	67.35	160.54	1.000	59.85	Pass
40	138.35	291.65	0.779	12.14	5.28	234.08	67.37	160.57	1.000	59.84	Pass
45	134.52	295.48	0.764	11.67	5.23	233.69	67.33	160.60	1.000	59.86	Pass
50	128.10	301.90	0.749	11.22	5.20	233.30	67.32	160.78	1.000	59.86	Pass
55	119.05	310.95	0.754	11.36	5.27	232.91	67.24	161.08	1.000	59.88	Pass
60	123.79	306.21	0.758	11.49	5.27	232.52	67.29	161.48	1.000	59.85	Pass
65	116.12	313.88	0.778	12.11	5.41	232.11	67.23	161.83	1.000	59.86	Pass
70	120.53	309.47	0.798	12.74	5.48	231.71	67.29	162.00	1.000	59.83	Pass
75	122.57	307.43	0.840	14.11	5.67	231.26	67.29	161.97	1.000	59.83	Pass
80	124.97	305.03	0.882	15.56	5.84	230.81	67.36	161.85	1.000	59.81	Pass
85	149.85	280.15	0.941	17.71	5.90	230.42	67.58	161.75	1.000	59.72	Pass
90	179.61	250.39	1.000	20.00	5.84	230.11	67.94	161.61	1.000	59.56	Pass
95	201.41	228.59	1.000	20.00	5.61	229.93	68.44	161.51	1.000	59.35	Pass
100	185.02	244.98	1.000	20.00	5.78	229.54	68.70	161.38	1.000	59.25	Pass
105	196.56	233.44	1.000	20.00	5.67	229.37	69.17	161.33	1.000	59.05	Pass
110	190.33	239.67	1.000	20.00	5.73	229.12	69.56	161.20	1.000	58.88	Pass
115	205.88	224.12	1.000	20.00	5.57	229.06	70.08	161.17	1.000	58.66	Pass
120	199.47	230.53	1.000	20.00	5.64	228.86	70.51	161.07	1.000	58.48	Pass
125	185.02	244.98	1.000	20.00	5.78	228.64	70.94	160.97	1.000	58.30	Pass
130	181.44	248.56	1.000	20.00	5.82	228.53	71.43	160.94	1.000	58.09	Pass
135	178.24	251.76	1.000	20.00	5.85	228.47	71.94	160.93	1.000	57.87	Pass
140	178.77	251.23	1.000	20.00	5.84	228.47	72.45	160.93	1.000	57.65	Pass
145	180.09	249.91	1.000	20.00	5.83	228.51	72.95	160.94	1.000	57.43	Pass
150	184.20	245.80	1.000	20.00	5.79	228.60	73.45	160.96	1.000	57.22	Pass
155	186.55	243.45	1.000	20.00	5.77	228.72	73.93	160.99	1.000	57.01	Pass
160	183.85	246.15	1.000	20.00	5.79	228.83	74.42	161.05	1.000	56.80	Pass
165	186.18	243.82	1.000	20.00	5.77	229.00	74.87	161.14	1.000	56.61	Pass
170	187.89	242.11	1.000	20.00	5.75	229.19	75.31	161.24	1.000	56.42	Pass
175	189.12	240.88	1.000	20.00	5.74	229.41	75.72	161.34	1.000	56.24	Pass
180	191.76	238.24	1.000	20.00	5.72	229.66	76.10	161.43	1.000	56.07	Pass

Exhibit 15 - Table II
CONTOUR OVERLAP STUDY TABULATION
(page 2 of 2)

Azim (deg)	Radial Average	Antenna HAAT	Relative Field	Radial ERP	100 dBu Distance	AZ from Sta#2	Dist from Sta#2	Radial Average	Relative Field	Actual dBu	Overlap Pass/Fail
185	193.68	236.32	1.000	20.00	5.70	229.93	76.45	161.51	1.000	55.92	Pass
190	193.56	236.44	1.000	20.00	5.70	230.20	76.79	161.65	1.000	55.77	Pass
195	196.17	233.83	1.000	20.00	5.67	230.51	77.07	161.77	1.000	55.65	Pass
200	201.44	228.56	1.000	20.00	5.61	230.84	77.29	161.86	1.000	55.55	Pass
205	202.20	227.80	1.000	20.00	5.61	231.16	77.52	161.95	1.000	55.45	Pass
210	200.50	229.50	1.000	20.00	5.62	231.49	77.73	162.02	1.000	55.36	Pass
215	199.24	230.76	1.000	20.00	5.64	231.83	77.90	161.97	1.000	55.28	Pass
220	201.10	228.90	1.000	20.00	5.62	232.18	78.01	161.78	1.000	55.25	Pass
225	211.26	218.74	0.939	17.63	5.30	232.57	77.78	161.44	1.000	55.35	Pass
230	227.45	202.55	0.878	15.42	4.92	232.92	77.44	161.08	1.000	55.51	Pass
235	238.37	191.63	0.815	13.28	4.60	233.23	77.12	160.84	1.000	55.66	Pass
240	244.96	185.04	0.752	11.31	4.32	233.50	76.81	160.67	1.000	55.79	Pass
245	263.96	166.04	0.713	10.17	3.99	233.73	76.43	160.59	1.000	55.96	Pass
250	261.18	168.82	0.674	9.09	3.89	233.96	76.25	160.58	1.000	56.03	Pass
255	252.44	177.56	0.714	10.20	4.12	234.27	76.36	160.52	1.000	55.99	Pass
260	225.45	204.55	0.754	11.37	4.49	234.63	76.55	160.30	1.000	55.91	Pass
265	194.21	235.79	0.821	13.48	5.03	235.10	76.83	159.88	1.000	55.81	Pass
270	179.80	250.20	0.888	15.77	5.41	235.54	76.91	159.30	1.000	55.79	Pass
275	168.45	261.55	0.944	17.82	5.74	235.97	76.88	158.68	1.000	55.83	Pass
280	157.61	272.39	1.000	20.00	6.06	236.42	76.78	158.37	1.000	55.88	Pass
285	166.07	263.93	1.000	20.00	5.97	236.64	76.34	158.32	1.000	56.07	Pass
290	167.47	262.53	1.000	20.00	5.96	236.88	75.93	158.29	1.000	56.24	Pass
295	156.57	273.43	1.000	20.00	6.07	237.17	75.56	158.28	1.000	56.40	Pass
300	151.69	278.31	1.000	20.00	6.12	237.41	75.12	158.27	1.000	56.59	Pass
305	150.49	279.51	1.000	20.00	6.13	237.59	74.64	158.33	1.000	56.79	Pass
310	145.95	284.05	1.000	20.00	6.18	237.76	74.15	158.37	1.000	57.00	Pass
315	142.20	287.80	1.000	20.00	6.21	237.89	73.64	158.41	1.000	57.22	Pass
320	140.37	289.63	1.000	20.00	6.23	237.98	73.11	158.44	1.000	57.45	Pass
325	141.66	288.34	1.000	20.00	6.22	238.01	72.56	158.46	1.000	57.68	Pass
330	136.31	293.69	1.000	20.00	6.26	238.05	72.02	158.47	1.000	57.91	Pass
335	125.52	304.48	1.000	20.00	6.35	238.08	71.46	158.48	1.000	58.15	Pass
340	134.91	295.09	1.000	20.00	6.28	237.94	70.93	158.43	1.000	58.38	Pass
345	135.78	294.22	1.000	20.00	6.27	237.82	70.40	158.39	1.000	58.61	Pass
350	134.11	295.89	1.000	20.00	6.28	237.68	69.88	158.36	1.000	58.83	Pass
355	133.37	296.63	1.000	20.00	6.29	237.49	69.38	158.30	1.000	59.05	Pass