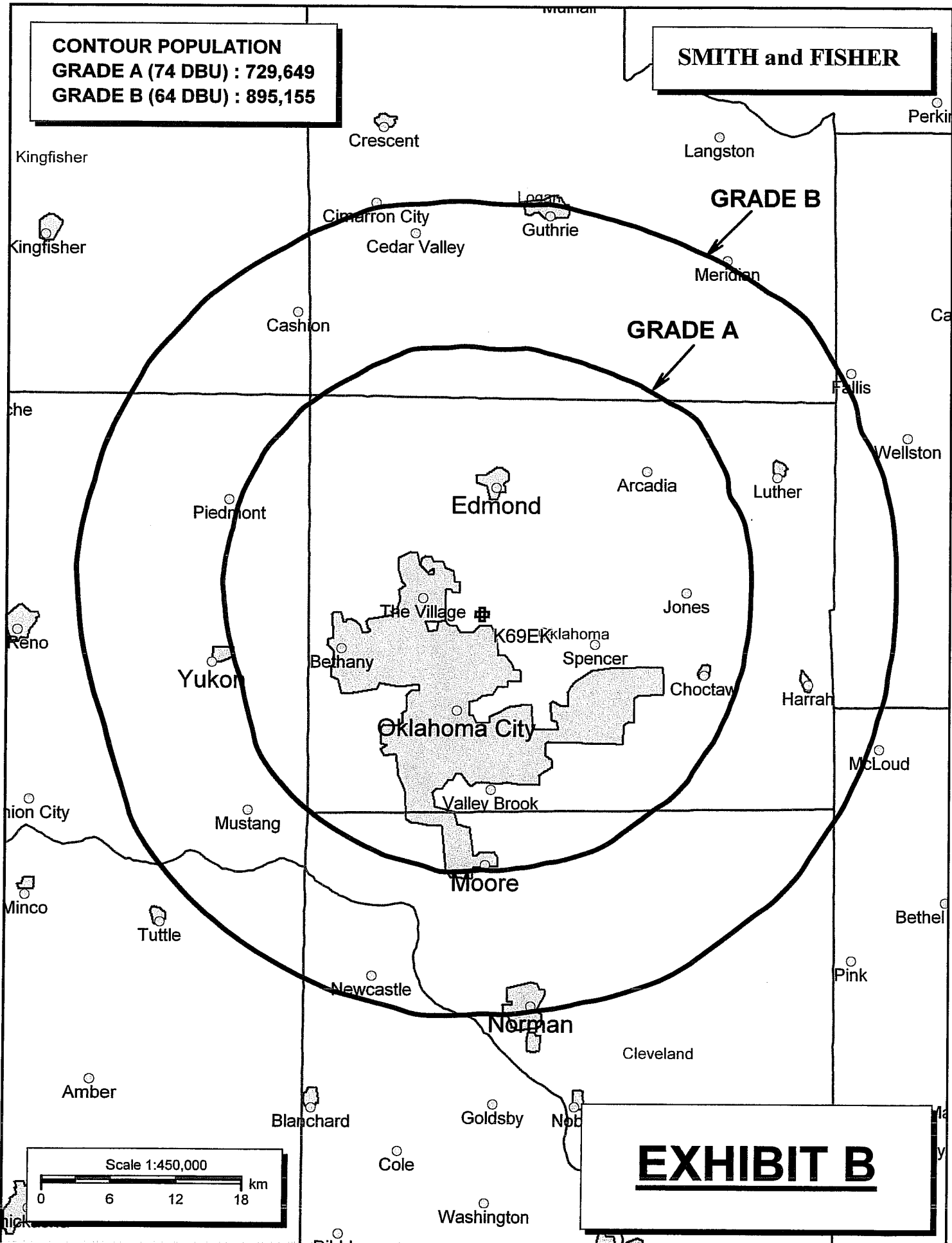


CONTOUR POPULATION
GRADE A (74 DBU) : 729,649
GRADE B (64 DBU) : 895,155

SMITH and FISHER



GRADE A

GRADE B

EXHIBIT B

Scale 1:450,000

0 6 12 18 km

CONTOUR OVERLAP AND
LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED K69EK STA
CHANNEL 48 – OKLAHOMA CITY, OKLAHOMA

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit C-2. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to four stations: KWHB-DT, Channel 48 in Tulsa, Oklahoma; KOCB(TV), Channel 34 in Oklahoma City, Oklahoma; K48AP, Channel 48 in Elk City, Oklahoma; and, two applications for a new LPTV facility on Channel 48 in McAlister, Oklahoma (BNPTTL-20000830AIV and BNPTTL-20000830ARZ).

It is important to note that there is a pending application filed by MS Communications, for a site-change/displacement of K30EC (BPTTL-20021029AAY) from Batesville, Arkansas to Oklahoma City. However, due to the excessive distance proposed for this site change (over 500 kilometers), the application is being opposed by the licensee of K69EK, as outlined in the K69EK Channel 48 displacement application (BPTTL-20030829BDM).

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to the facilities of concern. The software utilizes a 2-square kilometer cell size (except where

EXHIBIT C-1

noted), calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed K69EK) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit C-3. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, waivers of Section 74.705 of the Commission's Rules with respect to interference to KOCB, Section 74.706 with regard to KWHB-DT, and Section 74.707 with respect to K48AP and the McAlister LPTV applications are requested and believed to be justified based on the aforementioned Longley-Rice studies.

SMITH AND FISHER

EXHIBIT C-2

PROPOSED K69EK STA
CH. 48 - OKLAHOMA CITY OK

REFERENCE
35 32 52 N LPTV Pwr = 18.1 kW, HAMSL COR= 557 M
97 29 29 W
..... Channel 48Z, 674 MHz

DISPLAY DATES
DATA 03-29-
SEARCH 03-30-

Call	Channel	Location	Dist	Azi	FCC	Margin	
KWHB-D*CPM	48	Tulsa	OK	172.36	71.7	> 303.21	-129.
KOCB*	CP 34-	Oklahoma City	OK	0.33	56.1	> 093.50	-93.
KOCB*	LI 34-	Oklahoma City	OK	1.46	22.1	> 087.12	-85.
K48AP*	CP 48N	Elk City, Etc.	OK	162.75	263.0	> 180.66	-17.
K48AP*	LI 48N	Elk City, Etc.	OK	162.75	263.0	> 175.70	-11.
NEW*	AP 48Z	Mcalister	OK	173.50	111.0	> 175.09	-1.
NEW*	AP 48Z	Mcalister	OK	173.50	111.0	> 175.09	-1.
K48HD*	CP 48+	Enid	OK	101.09	342.7	> 099.22	5.
KSTR-D	LI 48	Irving	TX	336.89	171.5	> 327.59	9.
AL400	AL 48+	Hugo	OK	248.98	132.8	> 239.29	9.
K58AX	CP 48Z	Buffalo	OK	239.37	304.0	> 187.26	52.
AL339	AL 48-	Columbus	KS	298.73	52.0	> 239.29	59.
KWHB	LI 47Z	Tulsa	OK	172.36	71.7	> 105.69	66.
KWHB	CP 47Z	Tulsa	OK	172.36	71.7	> 099.51	72.
KGEB-D	CP 49	Tulsa	OK	149.53	67.9	> 076.55	72.

* Actual radials antenna height and directional patterns used (if any)

INTERFERENCE SUMMARY

PROPOSED K69EK STA
CHANNEL 48 – OKLAHOMA CITY, OKLAHOMA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
KWHB-DT BMPCDT-20041028AGV	CP	Tulsa, OK	48	970,107	81	<0.1
KOCB(TV) BPCT-20020722AAF	CP	Oklahoma City, OK	34	1,253,433	0	0
KOCB(TV) BLCT-19791029KF	Lic.	Oklahoma City, OK	34	1,216,035	0	0
K48AP BPTT-20010625ABH	CP	Elk City, OK	48	8,221	0	0
K48AP BLTT-19881215IB	Lic.	Elk City, Ok	48	3,092	0	0
NEW-T BNPTTL-20000830AIV	Appl.	McAlister, OK	48	21,859	0	0
NEW-T BNPTTL-20000830ARZ	Appl.	McAlister, OK	48	21,859	0	0

POWER DENSITY CALCULATION
PROPOSED K69EK STA
CHANNEL 48 – OKLAHOMA CITY, OKLAHOMA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Oklahoma City facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 18.1 kw (H, V), an effective antenna height of 213 meters above ground, and assuming a vertical relative field value of 20 percent at the steeper elevation angles for the proposed SWR antenna, maximum power density two meters above ground of 0.00054 mw/cm^2 is calculated to occur near the base of the tower. Since this is only 0.1 percent of the 0.45 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 48 (674-680 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.