

Purpose of Application & Technical Statement

This minor change to a Construction Permit requests a change to an alternate tower location and height on the authorized and operating channel and Effective Radiated Power. The translator will continue to be used as a translator for Primary Station KBOB (AM) as currently authorized.

OVERLAP REQUIREMENTS

The attached map of contours depicts the proposed allocation situation with respect to all pertinent co and adjacent facilities. All facilities have been depicted utilizing either the maximum ERP or directional pattern data as on file with the commission and 1 degree radial intervals on close in contours in the interest of accuracy. AAT data for the proposed facility was derived from the FCC's 30 second database, *Comstudy*.

As seen on the attached map of contours, channel 281-D is operable at the proposed location with the following facility notes:

- In compliance with 47 CFR 74.1204(g) the proposed facility operates at an effective radiated power which is over 100 watts, therefore protection to intermediate frequency facilities has been calculated and meets all mileage separation requirements.
- The proposed location is within the protected 60dbu (50,50) contour of second-adjacent station WLLR-FM channel 279-CO located 8.2km away . An interference analysis has been conducted based on the u/d ratio of +40 dB at the proposed site. The signal of WLLR-FM is 104.5 dBu (50,50) making the relevant interfering contour 144.5u (50,10) This interfering signal will not extend more than 6 meters from the aperture of the proposed antenna. As such, the interfering contour is incapable of reaching the general public.
- The proposed 60dBu (50,50) contour overlaps the 100dBu contour of second-adjacent station K283BV; this is received interference only and is not considered in this analysis.
- The proposed location is within the protected 60dbu (50,50) contour of second-adjacent station K283BV located 0.5km away . An interference analysis has been conducted based on the u/d ratio of +40 dB at the proposed site. The signal of K283BV is approximately 140 dBu (50,50) making the relevant interfering contour 180Bu (50,10) This interfering signal will not extend more than 1 meter from the aperture of the proposed antenna. As such, the interfering contour is incapable of reaching the general public.

Based on this showing, a waiver of section 74.1204 is requested in accordance with *Living Way Ministries, Inc.* (FCC 08-242) on the basis of zero population in the area of interference.

It should be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 CFR. 74.1203.

