

**PROPOSED MINOR CHANGE
License LMS- 0000105920
K202BY (FX) Enid, OK
FACID 21057**

TECHNICAL STATEMENTS

This instant application requests a modification of the antenna for this translator facility at a tower which is adjacent to the licensed location at a modified height and Effective Radiated Power on an adjacent operating channel. The proposed facility will continue to repeat co-owned non-reserved non-commercial educational station KJIL, FACID 24987. This application is necessary because of co-channel NCE full power application LMS- 0000167076 which is the predicted winner in MX Group 176 and will displace the licensed operation of this translator.

CONTOUR OVERLAP REQUIREMENTS

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

There is no prohibited overlap of this facility with any other facility in the allocation landscape with the exception of second adjacent translator facility K206CA collocated on the same tower 30 meters below. The overlap of the K206CA 100dBu contour is accepted interference by the proposed facility herein. The Proposed 100dBu (50,10) contour is within the licensed K206CA 60dBu (50,50) contour. An interference analysis would normally be conducted based on the u/d ratio of +40 dB at the proposed site. The signal of K206 CA is almost immeasurably high making the relevant interfering contour also almost immeasurably high. In no case would the free space distance to this contour in a worse-case scenario utilizing a single dipole antenna be no more than mere meters from the aperture of the antenna. The proposed antenna height remains 113 above ground, making the relevant interfering contour incapable of reaching the ground.

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.

MAP OF INTERFERING CONTOURS:

