

## Purpose of Application & Technical Statement

This minor change to the licensed facility requests a non-adjacent channel displacement channel change and the licensed tower location, elevation, antenna and effective radiated power.

This displacement request is precipitated by the construction of KXCD as authorized by Construction Permit LMS-0000159152. This licensee has been notified by KXCD of their intention to begin Program Test Authority very soon which will require this translator facility to cease operations. All available alternate channels have been analyzed and CH246 has been deemed the least interference in the spectrum for operation of the translator.

### 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 246-D is operable at the proposed location with the following facility notes:

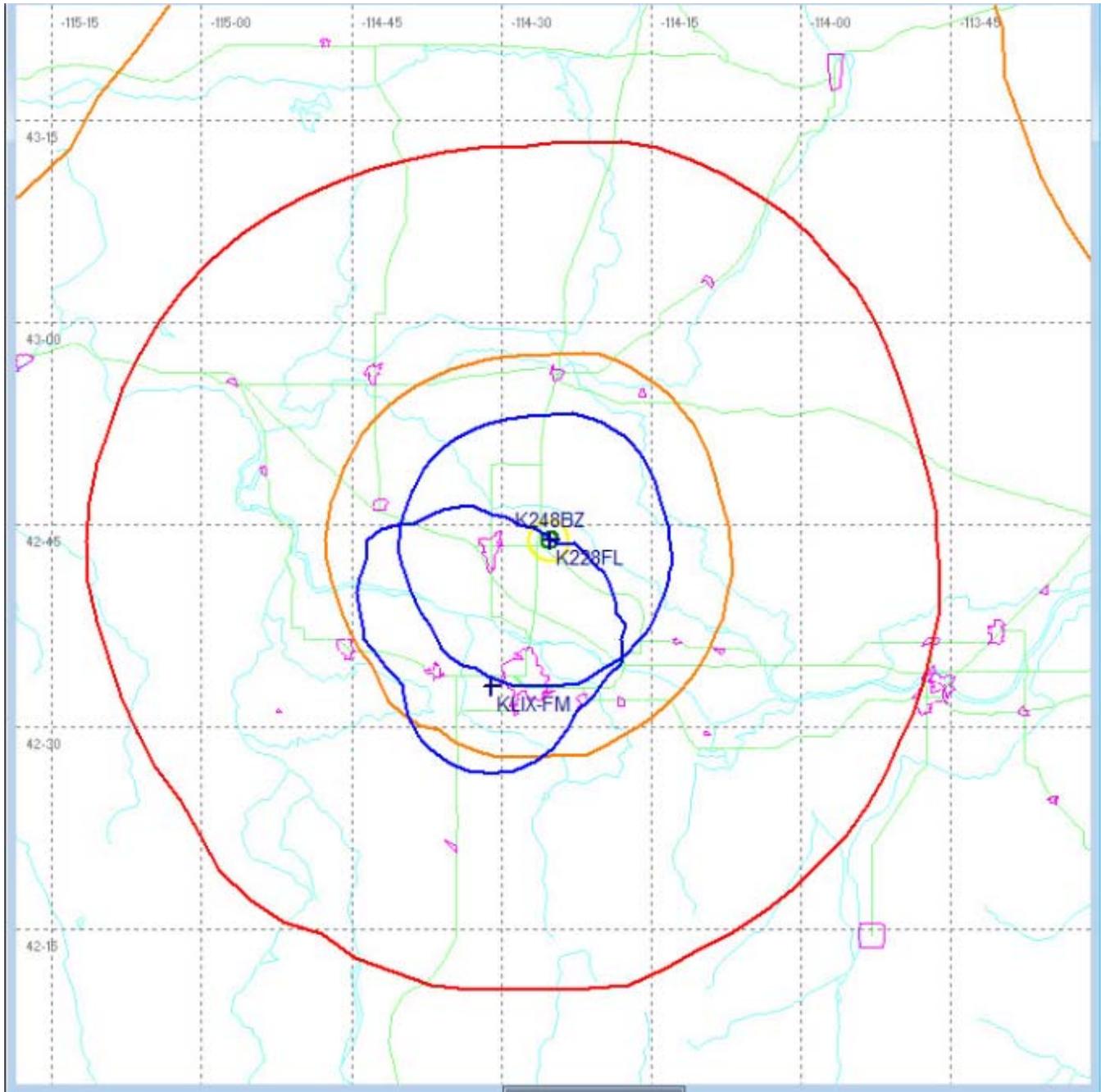
- In compliance with 47 CFR 74.1204(g) the proposed facility operates at an effective radiated power which is over 100 watts, therefore protection to intermediate frequency facilities has been calculated and meets all mileage separation requirements.
- The proposed location is collocated with second-adjacent translator K248BZ and the relevant interfering contour of the proposed facility 100 dBu (50,10), which would extend less than 1 meter from the transmitting antenna under worst-case single dipole conditions.
- The proposed location is within the protected 60dbu (50,50) contour of third-adjacent station KLIX-FM channel 243-C1 located 21.6 meters away. Therefore, an interference analysis has been conducted based on the u/d ratio of +40 dB at the proposed site. The signal of WFLV (FM) at the proposed location is approximately 77 dBu (50,50) making the relevant interfering contour of the proposed facility 117 dBu (50,10), which would extend 156 meter from the aperture of the transmitting antenna under worst-case single dipole conditions.
- The attached aerial photo shows that the tower location, in a 'tower farm' of multiple structures, and the entire 156 meter distance falls within the site restricted tower area, and not where the general public would be permitted at any given time.

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.

## CONTOURS

The attached map of contours utilizes FCC 30 Sec Terrain underlay only and for compliance demonstration the tabular data for the licensed, proposed and primary station 60dbu contours is attached.



AERIAL PHOTO

