Comprehensive Engineering Exhibit
Minor Modification of BNPFT-20130823ABA
W268CC, Facility ID No. 140101

This exhibit is in support of a minor modification to specify a new transmitter location for W268CC.

Antenna Location

The proposed facility antenna is to be mounted on ASR 1023126, at 86 meters above ground level. Below as **Figure 1** is an overlap and spacing study from which it can be determined that this proposal is within the permitted protected contour of **second** adjacent channel stations W266CN channel 266, Hillsboro.

Concerning W266CN, Section 74.1204(d) states that "*The provisions of this section concerning prohibited overlap will not apply where the area of such overlap lies entirely over water. In addition, an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such other factors as may be applicable*."

We will demonstrate that a lack of population and/or other factors allow this proposal to be compliant with 74.1204. The process commonly called "Living Way"[1], which allows for the use of U/D Analysis, also known as "signal strength ratio methodology" is to be utilized. In this instant case the facilities of to be protected are second adjacent and are to be afforded protection from signals 40 dB stronger[2] than they present in the location of the proposed antenna location.

Figure 2 is a map showing the predicted 66 dBu signal contour of W266CN at the proposed translator antenna location utilizing the FCC F50:50 curves. Thus only a signal exceeding 106 dBu (66 + 40) in a habitable area is predicted to cause interference to W266CN from this instant proposal. Utilizing the line of sight equation[3] and proposed antenna pattern it has been determined that a 106 dBu signal developed by 250 watts, as proposed, emitted by the proposed antenna mounted 86 meters above ground will not reach habitable space as demonstrated in **Figures 3, 4, and 4a**. With examination of the images in **Figures 4 and 4a** it can be determined that no habitable space is within the confines of the interference contour. Thus the provisions of the rules section concerning prohibited overlap will not apply as it has been demonstrated that no actual interference will occur due to a lack of population and other factors as applied in this instant proposal.

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[1] As recently described in FCC 08-242 in connection with BPFT-19981001TA
[2] See §74.1204(a)(3)
[3] ReachDistMeters=106.92-(20*(LOG10[DistMeters]/1000)))+[ERPin dBk]

Minor Change Status

This modification qualifies as a minor change[4] as there is contour overlap as shown in **Figure 2** by the proposed site being within the 76 dBu of the permitted facility**,** with no change in channel.

RF Radiation Statement

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

The proposed antenna system is a Scale "FMVMP-3", 3- element vertical polarity antenna mounted 86 meters above ground. As this element type is not modeled in the FM Model program, a worst-case "Ring-Stub" type of antenna element array was used in the program, with an effective radiated power of 0.250 Kilowatts in the vertical plane. At 2 meters above the surface, at 15 meters from the base of the tower, this proposal will contribute worst case, 0.1 microwatts per square centimeter, or 0.01 percent of the allowable ANSI limit for controlled exposure, and 0.05 percent of the allowable limit for uncontrolled exposure. This figure is less than 5% of the applicable FCC exposure limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be less than 5% of the applicable exposure limit. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

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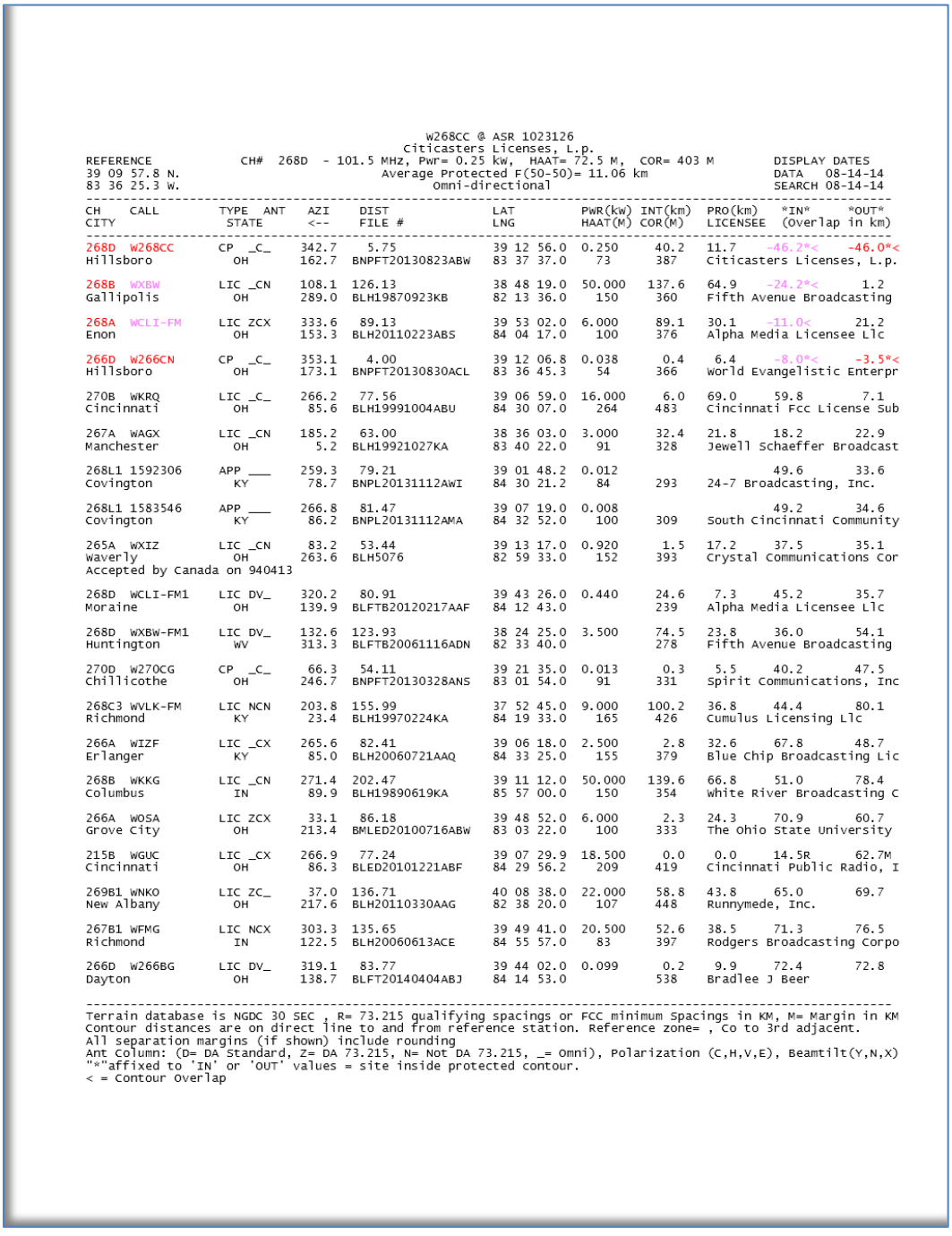
[4] See §74.1233

Figure 1. Overlap and Spacing Study



W268CC @ ASR 1023126
Citicasters Licenses, L.p.

REFERENCE CH# 268D - 101.5 MHz, Pwr= 0.25 kW, HAAT= 72.5 M, COR= 403 M DISPLAY DATES
39 09 57.8 N. Average Protected F(50-50)= 11.06 km DATA 08-14-14
83 36 25.3 W. Omni-directional SEARCH 08-14-14

CH CALL / CITY	TYPE ANT / STATE	AZI / <--	DIST / FILE #	LAT / LNG	PWR(kW) / HAAT(M)	INT(km) / COR(M)	PRO(km) / LICENSEE	*IN* (Overlap in km)	*OUT*
268D W268CC	CP _C_	342.7	5.75	39 12 56.0	0.250	40.2	11.7	-46.2*<	-46.0*<
Hillsboro	OH	162.7	BNPFT20130823ABW	83 37 37.0	73	387	Citicasters Licenses, L.p.		
268B WXBW	LIC _CN	108.1	126.13	38 48 19.0	50.000	137.6	64.9	-24.2*<	1.2
Gallipolis	OH	289.0	BLH19870923KB	82 13 36.0	150	360	Fifth Avenue Broadcasting		
268A WCLI-FM	LIC ZCX	333.6	89.13	39 53 02.0	6.000	89.1	30.1	-11.0<	21.2
Enon	OH	153.3	BLH20110223ABS	84 04 17.0	100	376	Alpha Media Licensee Llc		
266D W266CN	CP _C_	353.1	4.00	39 12 06.8	0.038	0.4	6.4	-8.0*<	-3.5*<
Hillsboro	OH	173.1	BNPFT20130830ACL	83 36 45.3	54	366	World Evangelistic Enterpr		
270B WKRQ	LIC _C_	266.2	77.56	39 06 59.0	16.000	6.0	69.0	59.8	7.1
Cincinnati	OH	85.6	BLH19991004ABU	84 30 07.0	264	483	Cincinnati Fcc License Sub		
267A WAGX	LIC _CN	185.2	63.00	38 36 03.0	3.000	32.4	21.8	18.2	22.9
Manchester	OH	5.2	BLH19921027KA	83 40 22.0	91	328	Jewell Schaeffer Broadcast		
268L1 1592306	APP ___	259.3	79.21	39 01 48.2	0.012		49.6	33.6	
Covington	KY	78.7	BNPL20131112AWI	84 30 21.2	84	293	24-7 Broadcasting, Inc.		
268L1 1583546	APP ___	266.8	81.47	39 07 19.0	0.008		49.2	34.6	
Covington	KY	86.2	BNPL20131112AMA	84 32 52.0	100	309	South Cincinnati Community		
265A WXIZ	LIC _CN	83.2	53.44	39 13 17.0	0.920	1.5	17.2	37.5	35.1
Waverly	OH	263.6	BLH5076	82 59 33.0	152	393	Crystal Communications Cor		
Accepted by Canada on 940413									
268D WCLI-FM1	LIC DV_	320.2	80.91	39 43 26.0	0.440	24.6	7.3	45.2	35.7
Moraine	OH	139.9	BLFTB20120217AAF	84 12 43.0		239	Alpha Media Licensee Llc		
268D WXBW-FM1	LIC DV_	132.6	123.93	38 24 25.0	3.500	74.5	23.8	36.0	54.1
Huntington	WV	313.3	BLFTB20061116ADN	82 33 40.0		278	Fifth Avenue Broadcasting		
270D W270CG	CP _C_	66.3	54.11	39 21 35.0	0.013	0.3	5.5	40.2	47.5
Chillicothe	OH	246.7	BNPFT20130328ANS	83 01 54.0	91	331	Spirit Communications, Inc		
268C3 WVLK-FM	LIC NCN	203.8	155.99	37 52 45.0	9.000	100.2	36.8	44.4	80.1
Richmond	KY	23.4	BLH19970224KA	84 19 33.0	165	426	Cumulus Licensing Llc		
266A WIZF	LIC _CX	265.6	82.41	39 06 18.0	2.500	2.8	32.6	67.8	48.7
Erlanger	KY	85.0	BLH20060721AAQ	84 33 25.0	155	379	Blue Chip Broadcasting Lic		
268B WKKG	LIC _CN	271.4	202.47	39 11 12.0	50.000	139.6	66.8	51.0	78.4
Columbus	IN	89.9	BLH19890619KA	85 57 00.0	150	354	White River Broadcasting C		
266A WOSA	LIC ZCX	33.1	86.18	39 48 52.0	6.000	2.3	24.3	70.9	60.7
Grove City	OH	213.4	BMLED20100716ABW	83 03 22.0	100	333	The Ohio State University		
215B WGUC	LIC _CX	266.9	77.24	39 07 29.9	18.500	0.0	0.0	14.5R	62.7M
Cincinnati	OH	86.3	BLED20101221ABF	84 29 56.2	209	419	Cincinnati Public Radio, I		
269B1 WNKO	LIC ZC_	37.0	136.71	40 08 38.0	22.000	58.8	43.8	65.0	69.7
New Albany	OH	217.6	BLH20110330AAG	82 38 20.0	107	448	Runnymede, Inc.		
267B1 WFMG	LIC NCX	303.3	135.65	39 49 41.0	20.500	52.6	38.5	71.3	76.5
Richmond	IN	122.5	BLH20060613ACE	84 55 57.0	83	397	Rodgers Broadcasting Corpo		
266D W266BG	LIC DV_	319.1	83.77	39 44 02.0	0.099	0.2	9.9	72.4	72.8
Dayton	OH	138.7	BLFT20140404ABJ	84 14 53.0		538	Bradlee J Beer		

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference zone= , Co to 3rd adjacent.
All separation margins (if shown) include rounding
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
< = Contour Overlap

Figure 2. Contour Map

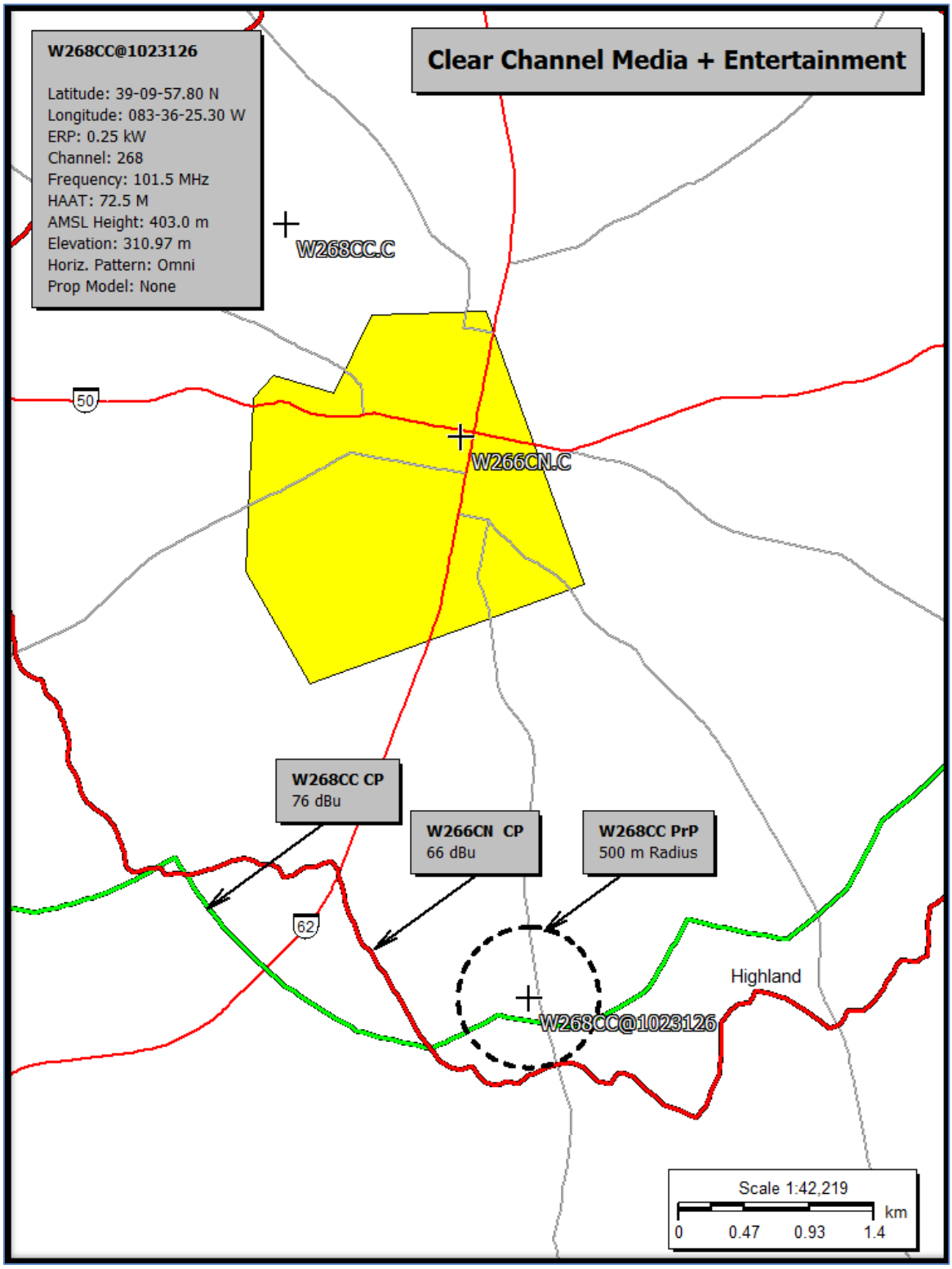


Figure 3. Distance to Signal Contour

Proposed Antenna:	Scala FMVMP-3	
Proposed Power:	0.25	kW
Antenna Height AGL:	86	meters
Interference Contour:	106	dBu f(50:10)
Artificial Rcv Antenna Height:	2	meters

Distance (Free Space) Equation: =(10^((106.92-[desired dBu]+[ERP in dBk])/20))*1000

Field Strength (dBu) Equation "=106.92-(20*(LOG10[DistMeters]/1000)))+[ERPin dBk]

Depression Angle Below Horizon	Antenna Relative Field	ERP in kW	ERP in dBk	Distance from Ant. to Interf Contour	Distance from Ant. to Artificial Plane	Field Strength in dBu @ Artificial Plane	Distance from Ant. to Ground Level	Field Strength in dBu @ Ground Level
0°	1.000	0.250	-6.02	555.87 m	infinite	---	infinite	---
-5°	0.921	0.212	-6.74	511.95 m	963.79 m	100.50 dBu	986.74 m	100.30 dBu
-10°	0.708	0.125	-9.02	393.78 m	483.74 m	104.21 dBu	495.25 m	104.01 dBu
-15°	0.418	0.044	-13.61	232.07 m	324.55 m	103.09 dBu	332.28 m	102.88 dBu
-20°	0.126	0.004	-24.02	69.98 m	245.60 m	95.10 dBu	251.45 m	94.89 dBu
-25°	0.100	0.003	-25.99	55.81 m	198.76 m	94.97 dBu	203.49 m	94.76 dBu
-30°	0.224	0.012	-19.04	124.24 m	168.00 m	103.38 dBu	172.00 m	103.17 dBu
-35°	0.242	0.015	-18.33	134.74 m	146.45 m	105.28 dBu	149.94 m	105.07 dBu
-40°	0.186	0.009	-20.65	103.17 m	130.68 m	103.95 dBu	133.79 m	103.74 dBu
-45°	0.093	0.002	-26.67	51.58 m	118.79 m	98.75 dBu	121.62 m	98.55 dBu
-50°	0.001	0.000	-66.02	0.56 m	109.65 m	60.10 dBu	112.27 m	59.89 dBu
-55°	0.069	0.001	-29.22	38.47 m	102.55 m	97.48 dBu	104.99 m	97.28 dBu
-60°	0.108	0.003	-25.36	59.98 m	96.99 m	101.82 dBu	99.30 m	101.62 dBu
-65°	0.118	0.003	-24.56	65.76 m	92.68 m	103.02 dBu	94.89 m	102.81 dBu
-70°	0.107	0.003	-25.42	59.53 m	89.39 m	102.47 dBu	91.52 m	102.26 dBu
-75°	0.082	0.002	-27.71	45.75 m	86.96 m	100.42 dBu	89.03 m	100.22 dBu
-80°	0.050	0.001	-32.04	27.79 m	85.30 m	96.26 dBu	87.33 m	96.06 dBu
-85°	0.015	0.000	-42.50	8.34 m	84.32 m	85.90 dBu	86.33 m	85.70 dBu
-90°	0.020	0.000	-39.96	11.17 m	84.00 m	88.48 dBu	86.00 m	88.27 dBu

Figure 4. Aerial View.

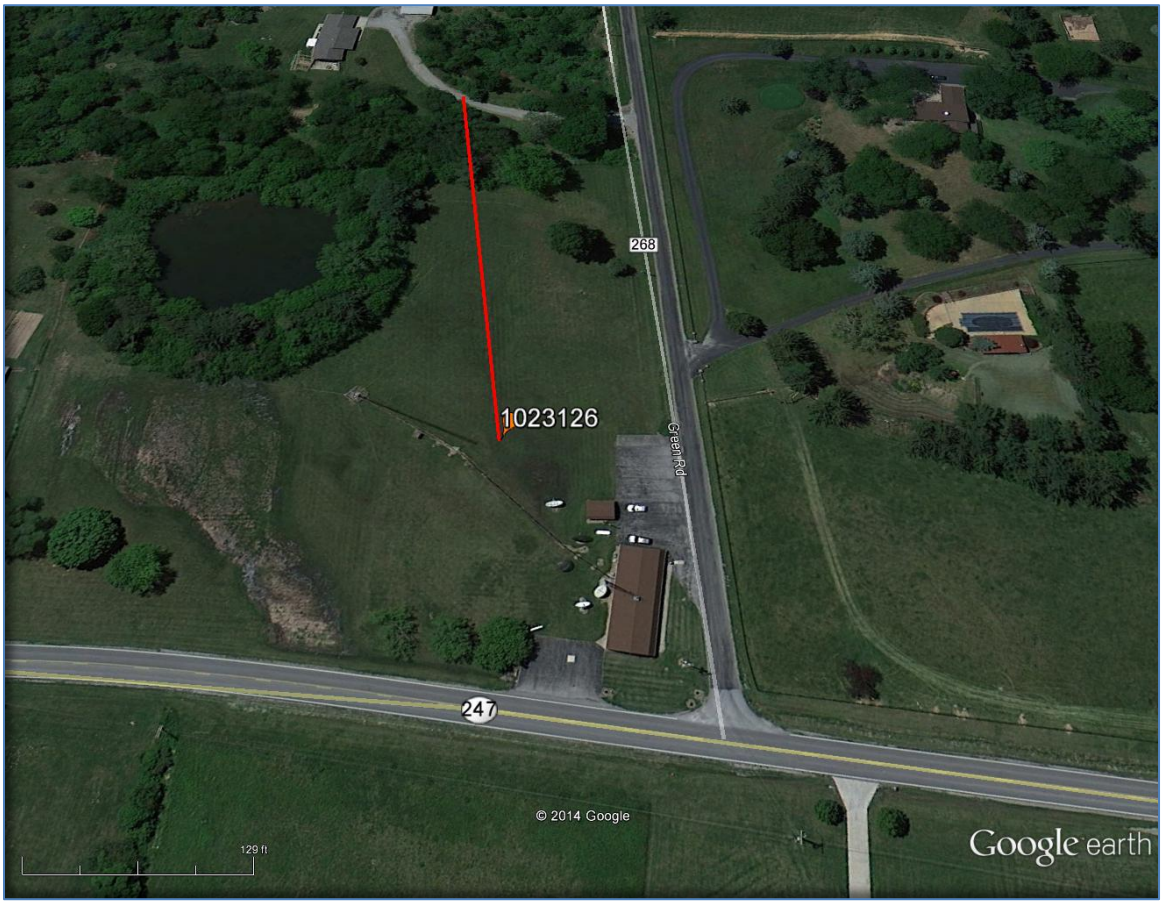


Figure 4a. Road View.