

**GREG BEST
CONSULTING, INC.**

9223 N. Manning Ave.
Kansas City, MO 64157
816-792-2913

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**2ND ADJACENT CHANNEL
WAIVER REQUEST FOR FCC
FILE BNPL 20131105AJX**

INTRODUCTION AND BACKGROUND

The purpose of this document is to describe the request for a 2nd adjacent channel waiver for the proposed facility and provide the necessary showings that will substantiate the basis for compliance with FCC policy for the request.

WAIVER REQUEST BASIS

The basis of this waiver request is predicated on the fact that the interference contour of the proposed station will not create interference to the protected station. The evidence is based upon the fact that no interference contours at the 103.65 dBu level will touch down on any location on the public highway or street. The interference contours are all contained on land that is owned by the applicant and there are no potential listeners within the contours. This is demonstrated by the attached exhibits. There are five exhibits.

1. Exhibit #1 provides a macro view showing the protected 60 dBu F(50,50) contour for 2nd adjacent channel KTTS. Also shown is the KTTS contour signal level that passes the proposed site. The contour signal level is 63.65 dBu F(50,50). There are no other potentially interfering stations to consider.
2. Exhibit #2 provides a better look by zooming in to show the proposed facility 103.65 dBu F(50,10) interfering contour (i.e. 40 dB greater than the KTTS protected contour).
3. Exhibit #3 provides a copy of spreadsheet calculations for critical radials that confirms that the interference contours do not extend onto public highways or streets. This was accomplished because the terrain rises in some radials and the critical radials that are the closest to the proposed facility occur at 230 degrees and 90 degrees with 330 degrees coming close. For the given ERP, the calculation process uses the antenna pattern depression angle and computes the distance to the interference contour along the depression angle, determines the horizontal distance from the interference contour to the tower base, then computes the vertical height between the radiation center of the antenna down to the height of the interference contour. For each radial calculated, a terrain chart is provided that covers the proposed facility location on the left of the chart to the extent of the terrain distance on the right. The results of the calculations indicate that all the interference contours occur above ground where the public highway and streets occur.
4. The 4th exhibit is a Google Earth map showing the 103.65 dBu F(50,10) contour and radials for calculation and reference.
5. The 5th exhibit is the antenna elevation pattern for the proposed facility.

Exhibits 1 & 2 provide the technical parameters for the proposed facility in terms of ERP, location, and RCAGL. The entire area encircled by the black contour shown in exhibit #2 and #4 is land owned by the Kimberling City Adventist Church (applicant for the LPFM construction permit). Thus there are no "potential listeners" within the contour and thus no interference potential is created to KTTS.

This attached exhibits should provide sufficient detail to allow the grant of a 2nd adjacent channel waiver for the proposed facility.

Regards,



Attachments