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ENGINEERING EXHIBIT EE-3:

**BILLY RAY LOCKLEAR
EVANGELISTIC ASSOCIATION, INC.
LUMBERTON, NORTH CAROLINA**

Ch. 208A 2.0 KW-DA-VERT 133.6 M HAAT

AUGUST 11, 2004

**ENGINEERING STATEMENT IN SUPPORT OF
A MINOR AMENDMENT TO
A PENDING APPLICATION FOR A
NEW NON-COMMERCIAL FM STATION**

**File No. BPED-19981022MB - Facility ID: 91947
MX GROUP 981012**

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1. F.C.C. Form 340.
2. Declaration of Engineer
3. Narrative Statement
4. Figure 6, FM to TV Interference Map.

Figures 1 to 5-A & 7, 7-A, 7-B on file no change

Figure 6 replaced herein & 6-A deleted.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am a principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Billy Ray Locklear Evangelistic Association, Inc., to prepare the instant engineering exhibit in support of an amendment to a pending application for Construction Permit for a new non-commercial FM radio station on Channel 208A at Lumberton, North Carolina (FCC Facility ID Number: 91947).

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 11th day of August 2004.

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EVANGELISTIC ASSOCIATION, INC.
LUMBERTON, NORTH CAROLINA**

Ch. 208A 2.0 KW-DA-VERT 133.6 M HAAT

NARRATIVE STATEMENT:

I. General:

This engineering statement has been prepared on behalf of Billy Ray Locklear Evangelistic Association, Inc. The purpose of this statement is to amend its pending application for a Construction Permit to build a new non-commercial FM broadcast facility on Channel 208A at Lumberton, North Carolina. The facility will operate with an ERP of 2.0 KW-DA-VERT and an HAAT of 133.6 Meters.

This amendment corrects the analysis concerning protection of the local TV Channel 6 station. **This amendment proposes no technical changes but is simply a clarification of its compliance with the FCC rules.**

The application is not a major environmental action, as defined by Section 1.1307 of the Commission's Rules. The proposed facility is in full compliance with both the "controlled" & "un-controlled" FCC Radiation Guidelines. Since the proposed facility contributes **less than 1%** of the "controlled" standard it is **categorically excluded** from further consideration.

Answers to questions and exhibits contained in the original, pending application are unchanged except as amended below.

II. Engineering Discussion:

A. TV Channel 6 Protection:

Figure 6 is a replacement map of the FM to TV interference / protection proposed by this FM application. This figure correctly locates the underlining map showing the cities while also eliminating the 6 dB correction factor. The population predicted to receive interference to the direct reception of WECT-TV-6 at Wilmington, NC, increased from the original prediction of 2,690 persons to **2,993** persons which is still **below the 3,000 person permissible threshold permitted by Section 73.525(c)**.

For an FM Channel 208 operation, the appropriate U/D is +20.4 dB at the 47 dBu contour of the TV-6. This translates to an interference F(50,10) FM contour of 67.4 dBu. However, the location of the proposed FM site is inside the 69.7 dBu contour of the TV-6 facility. Thus, the appropriate U/D varies from +2.1 to +1.0 dB. This translates to an interference F(50,10) FM contour of 71.8 dBu to the west of the FM and 74.6 dBu to the east of the FM. It should also be noted that since the FM proposes to operate with **vertical only** polarization and the area involved does **not** include any portion of a city with a population of 50,000 or more persons the applicable adjustment in the FM ERP is 40. Thus, in order to justify a proposed **vertical only** ERP of 2 kW-DA the interference and resulting population TV-6 analysis is based upon an ERP of 50 watts [0.05 kW = 2.0 kW divided by 40].

III. SUMMARY:

Billy Ray Locklear Evangelistic Association, Inc., proposes to construct a new FM facility on Channel 208A at Lumberton, North Carolina. **This amendment proposes no technical changes but is simply a clarification of its compliance with the FCC rules.** Interference to TV-6 is below the 3,000 person threshold and the proposed facility complies with the current RF exposure rules. As a result, this engineering proposal is in **full compliance** with the Commission's Rules.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

August 11, 2004.