

Exhibit 15 - Statement A
ALLOCATION CONSIDERATIONS
prepared for
Board Of Trustees Of The University Of Arkansas
New (FM) Nashville, Arkansas
Ch. 203A 1.5 kW (MAX-DA) 100 m

Board Of Trustees Of The University Of Arkansas (“Board”) herein proposes to construct a new non-commercial educational FM radio station to serve Nashville, Arkansas. The instant application proposes to operate on Channel 203 (88.5 MHz) with 1.5 kW effective radiated power (“ERP”) utilizing a directional, vertically polarized antenna located at 100 meters above average terrain (“HAAT”). This application is being filed in the October 2007 NCE new station filing window.¹

The proposed transmitter facility will be located at site to be developed by the applicant. An Environmental Assessment is believed to be necessary and will be conducted once the instant submission is considered to be a “singleton” application. Thus, Item 18 of Section VII – FM Engineering has been answered “NO” until it is appropriate to conduct the environmental study. When appropriate, an amendment will be filed to address the outstanding environmental questions. An FAA “Notice of Proposed Construction or Alteration” is not believed to be necessary since the proposed tower structure height is less than 200 feet and passes the FCC’s “Towair” program. Given the foregoing, the proposed tower does not require registration with the FCC.

A vertically polarized directional antenna system is proposed. The attached **Exhibit 15 - Figure 1** supplies a plot of the proposed directional “envelope” pattern. Tabulated relative field data is supplied in the accompanying FCC Form 340 Section VII “Tech Box” item 12. The principal community of Nashville is encompassed by the proposed 60 dB μ coverage contour. The attached **Exhibit 15 - Figure 2** supplies a coverage contour map for the proposed facility.

¹ See FCC Public Notice *Media Bureau Announces NCE FM New Station and Major Modification Filing Window for New and Certain Pending Proposals; Window to open on October 12, 2007*, DA 07-1613, Released April 4, 2007.

Exhibit 15 - Statement A
ALLOCATION CONSIDERATIONS
 (page 2 of 4)

A study of the minimum separation requirements for the proposed transmitter site shows that the following domestic FM facility requires study in regard to prohibited overlap under 73.509 of the Commission's Rules:

Channel Status	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Required Clear
202C1 LIC	KABF FM	LITTLE ROCK, AR BLED-19900803KC	2772	34 47 31 92 28 38	91.0 237	163.80 57.00	133.00 30.80
202A APP	NEW FM	MANDERVILLE, AR BNPED-20000124ABM	122484	33 28 18 93 56 43	1.8 74	58.63 176.83	72.00 -13.37
203C2 LIC	KTKL FM	STIGLER, OK BLED-20030116ABD	106473	35 08 30 95 21 20	22.0 196	178.83 315.63	166.00 12.83
203C2 APP	960814MD FM	COTTON VALLEY, LA BPED-19960814MD	82989	32 42 19 93 38 24	32.0 135	146.99 167.52	166.00 -19.01
204A LIC	KBPU FM	DE QUEEN, AR BLED-20020906AAA	92030	34 02 38 94 17 41	0.25 37.3	29.46 279.77	72.00 -42.54

The attached **Exhibit 15 - Figure 3** depicts the pertinent protected and interfering contours of the stations listed and the proposed facility. The contours were plotted using the actual ERP and height above terrain along each radial for each facility, as specified in §73.509(c). For the facilities under study, the antenna elevation above mean sea level, geographic coordinates, and ERP (including directional antenna relative field values, where appropriate) were retrieved from the FCC's engineering database. The requisite contours were determined using U.S.G.S. 3-second digitized terrain data along each radial of interest from each transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The F(50,10) distances are used to calculate distance to interfering contours, however if the distance is less than 16 km the F(50,50) curves are used, as specified by §73.509(c)(2).

Exhibit 15 - Figure 3 illustrates that there is no prohibited overlap between the proposed facility and pertinent co-channel and first adjacent channel facilities. There are no second or third adjacent channel stations that require evaluation.

A spacing study was performed as required by §73.507(c)(1) (regarding facilities differing in frequency by 10.6 or 10.8 MHz from the proposal). The proposed facility meets the minimum distance separation requirements of §73.207 in all such instances. The nearest domestic Channel

Exhibit 15 - Statement A
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(page 3 of 4)

256 station is KVMZ(FM), Waldo, AR, at a distance of 97.8 km. There are no Channel 257 stations within 100 km of the proposed Channel 203 site.

TV Channel 6 Considerations

Under §73.525(a)(1), an affected TV Channel 6 station must be considered with a proposed non-commercial educational facility on Channel 203 if the distance between the respective transmitter sites is 246 km or less. Within a 246 km radius of the proposed facility, the only full service TV Channel 6 facility is that of KTAL-TV, Texarkana, Texas (BLCT-1135), at a distance of 121.6 km.

Accordingly, **Exhibit 15 - Figure 4** depicts the calculated interference area using the method described in §73.525(e). Also shown in **Exhibit 15 - Figure 4** the Grade B contour of KTAL-TV. The instant proposal specifies an antenna using vertical polarization only due to its proximity to KTAL-TV. The interference area was calculated using the procedures outlined in §73.525(e) and an interfering power level of 0.0375 kW (1.5 kW divided by 40). The population within this predicted interference area is 1,041 persons. This number is less than the 3,000 person threshold stated in §73.525(c). Consequently, this proposed operation fully complies with the protection of TV Channel 6 facilities as specified in §73.525.

FCC Monitoring Stations and Other Broadcast Facilities

The nearest FCC monitoring station is located at Kingsville, TX and is 817.5 km distant. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3)(iv) that would suggest consideration of the monitoring station. The proposed site is also located outside bounds of the coordination distances specified in §73.1030(a)(1) and 73.1030(b)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia or Table Mountain, Colorado, is not required. The proposed facility is not located within 3.2 km of any AM broadcast facility.

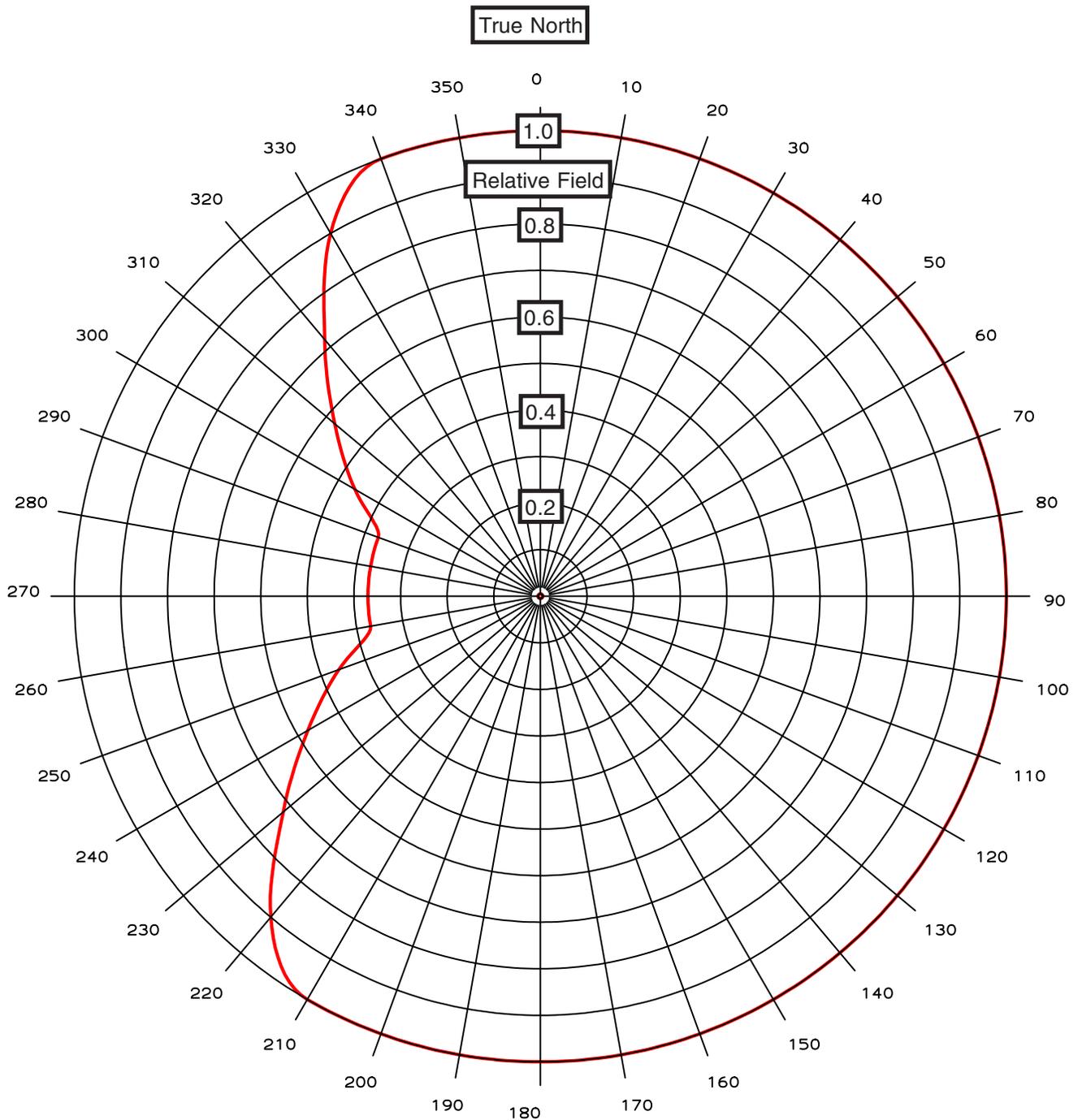
Exhibit 15 - Statement A
ALLOCATION CONSIDERATIONS
(page 4 of 4)

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

Fair Distribution Analysis

The proposed coverage area was evaluated to determine if the facility would provide a first or second NCE service to any portion of the coverage area. As shown in **Exhibit 15 – Figure 5**, a significant portion of the proposed coverage area will provide a first NCE coverage. The total population within the 60 dBu contour of the proposed facility is 14,221 persons, and an area of 1,088 sq. km. According to the 2000 Census, 14,192 people (99.8 percent) within the proposed coverage area will receive a *Priority One* First NCE service, and 29 (0.2 percent) will receive a *Priority Two* Second NCE service as defined in the Commission’s 307(b) criteria. The NCE stations shown in **Exhibit 15 – Figure 4** include only FM NCE facilities on Channels 201 through 220 according to information extracted from the FCC’s CDBS database.²

² See *Memorandum Opinion and Order, Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, MM Docket 95-31, 16 FCC Rcd. 5089 (2001).



**EXHIBIT 15 - FIGURE 1
ANTENNA HORIZONTAL PLANE
ENVELOPE PATTERN**

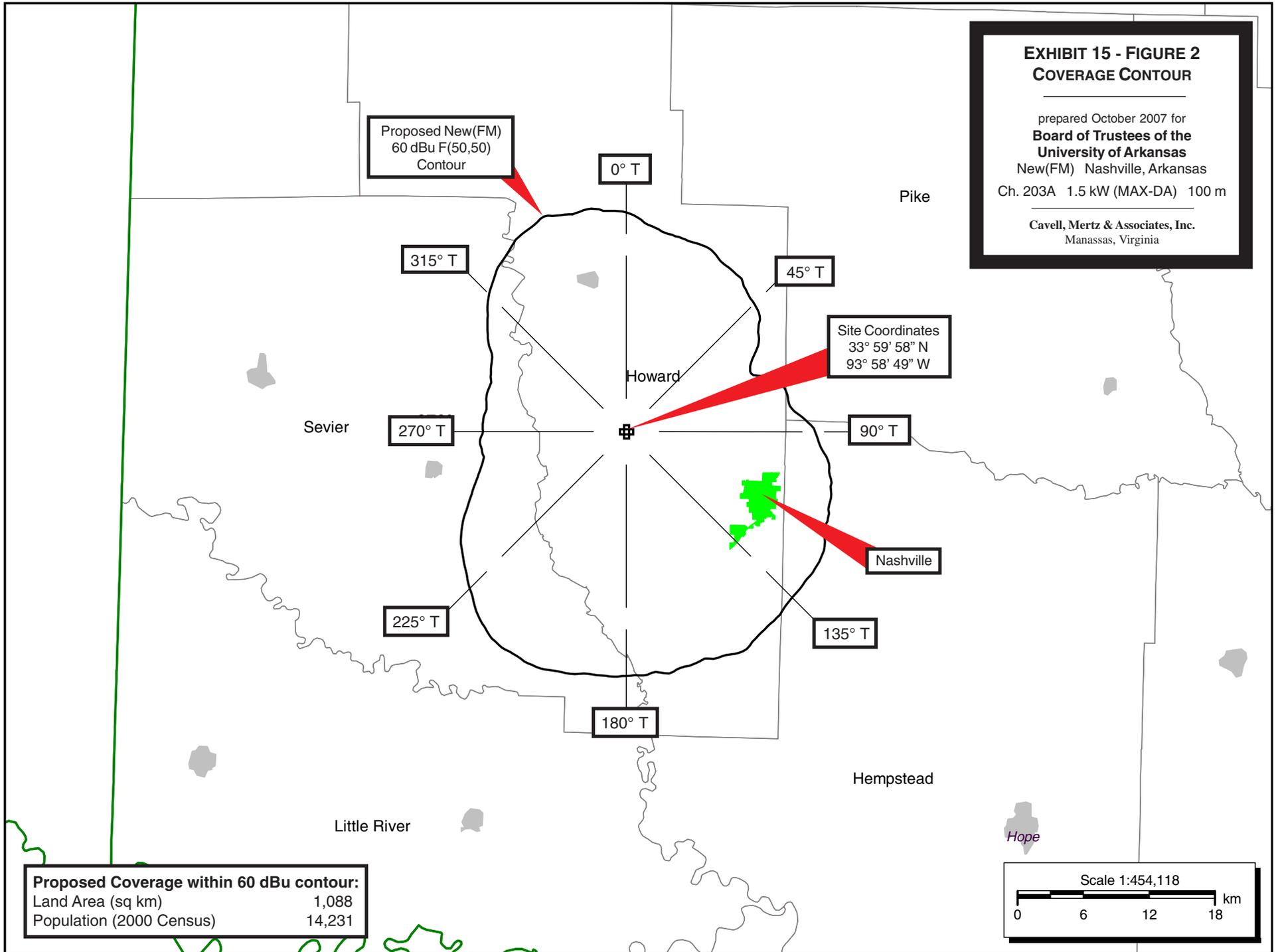
prepared October 2007 for
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Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

**EXHIBIT 15 - FIGURE 2
COVERAGE CONTOUR**

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Proposed New(FM)
 60 dBu F(50,50)
 Contour

0° T

315° T

45° T

Site Coordinates
 33° 59' 58" N
 93° 58' 49" W

Howard

270° T

90° T

Nashville

225° T

135° T

180° T

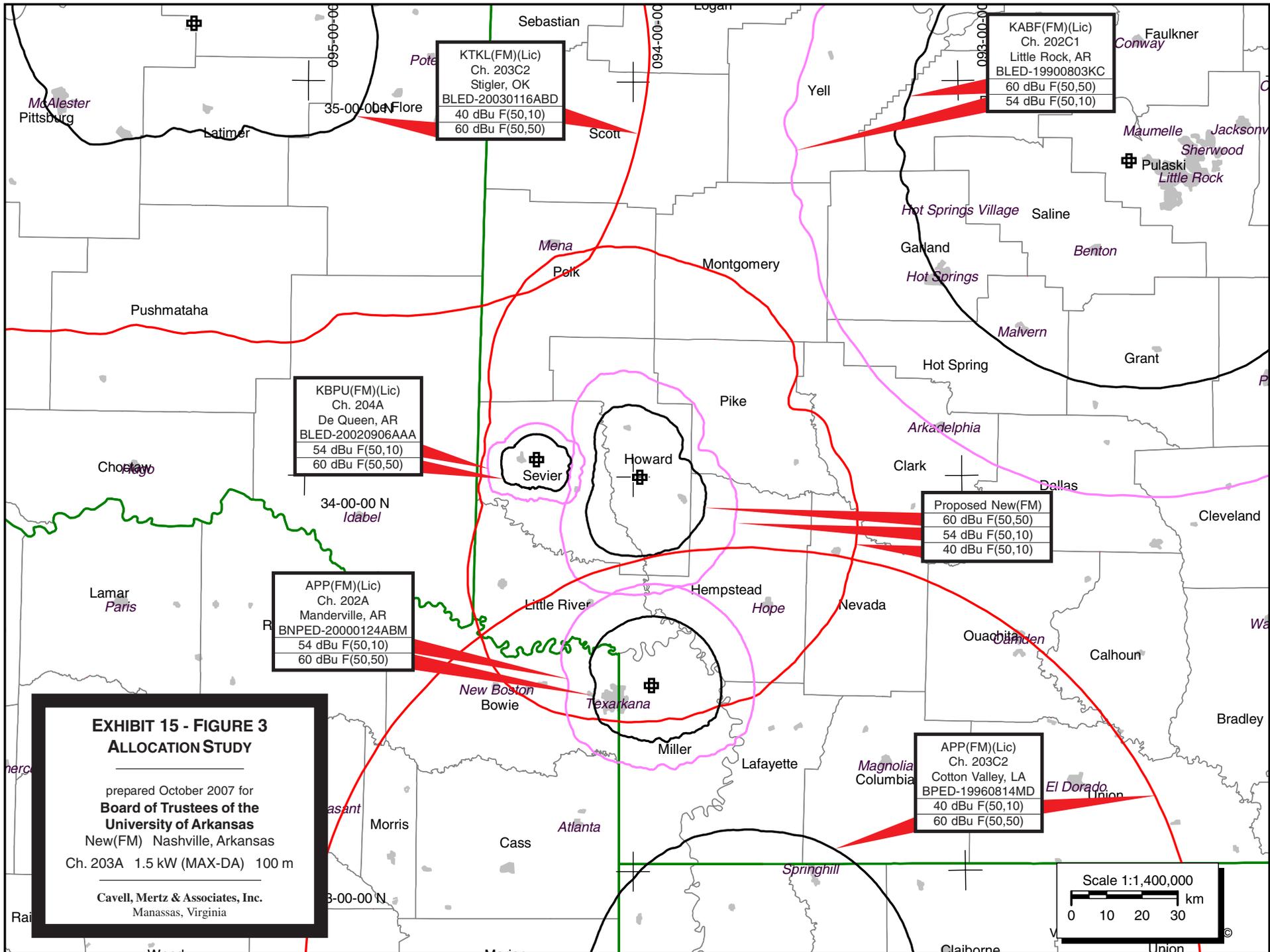
Hempstead

Little River

Hope

Proposed Coverage within 60 dBu contour:
 Land Area (sq km) 1,088
 Population (2000 Census) 14,231

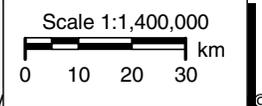
Scale 1:454,118
 0 6 12 18 km



**EXHIBIT 15 - FIGURE 3
ALLOCATION STUDY**

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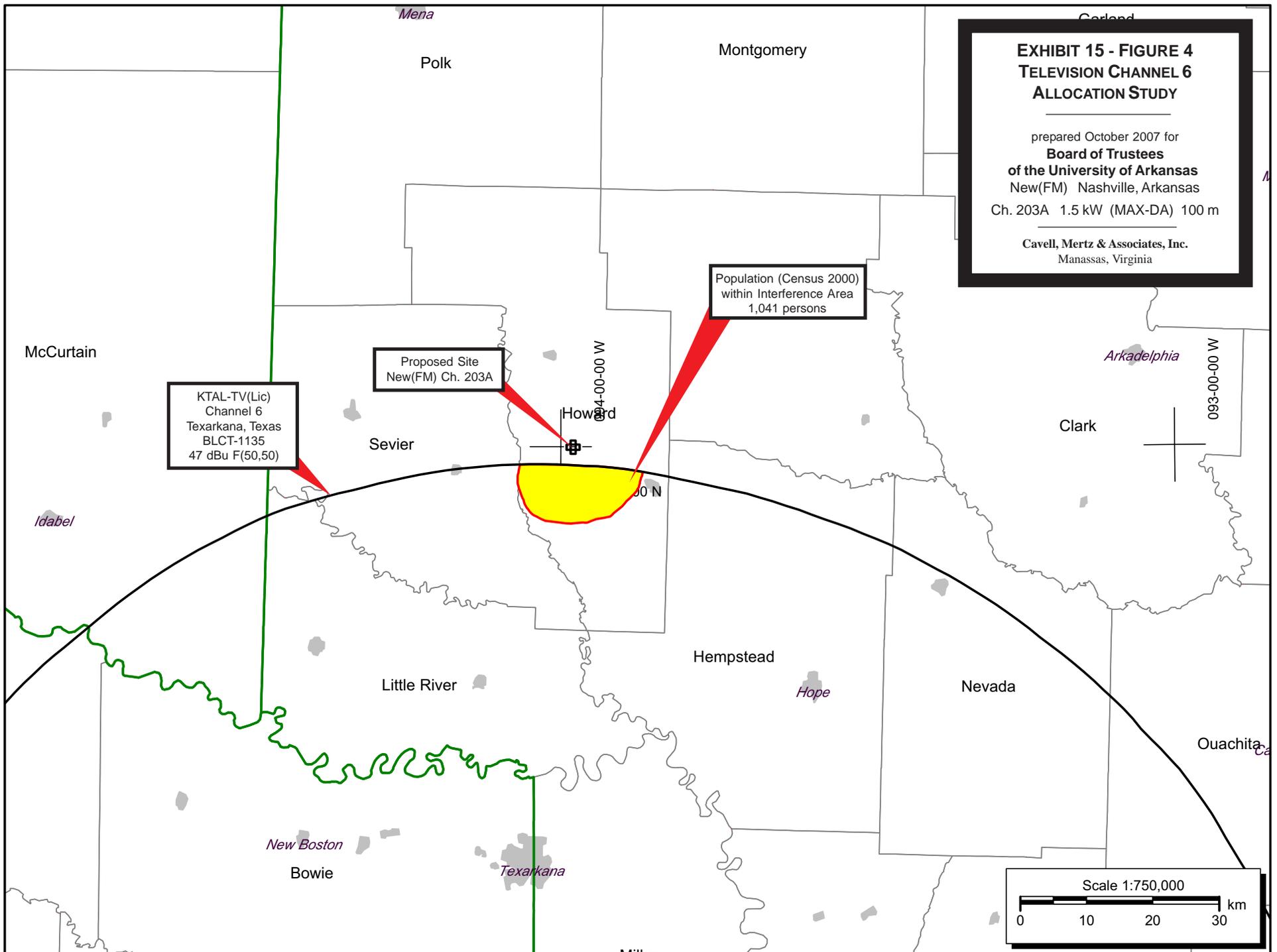
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**EXHIBIT 15 - FIGURE 4
TELEVISION CHANNEL 6
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Proposal will provide:	Population (2000 Census)	Percentage of Population
1st NCE Service	14,192	99.80%
2nd NCE Service	29	00.20%
3 or greater NCE Service	0	0%
Total Contour	14,221	100.0%

EXHIBIT 15 - FIGURE 5
FIRST AND SECOND
NEW FM NCE SERVICE

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