

## **TECHNICAL NARRATIVE**

This Technical Statement and attached exhibits were prepared on behalf of Hog Radio, Inc. (“Hog”), licensee of station KCYT, Channel 244C2, Facility ID Number 51098, licensed to Ozark, Arkansas. Hog herein proposed a minor change application FCC Form 301 to modify the facilities of KCYT from Channel 244C2 at Ozark, Arkansas to Channel 244C3 at Fayetteville, Arkansas. The proposed KCYT facility would operate with 4.1 kW at 166 meters HAAT. Hog is proposing to implement this change at an existing tower site. As such, the Federal Aviation Administration was not apprised of this proposal. The tower has been registered with the Commission and assigned Antenna Structure Registration Number 1038000.

The Reference Site Channel Study using coordinates 36 degrees 4 minutes 10 seconds North Latitude, 94 degrees 8 minutes 30 seconds (NAD 27) is fully spaced to all full power FM stations. The Hypothetical Site Community Coverage demonstrates that the 23.2 km hypothetical 70 dBu contour encompasses 100 percent of the Fayetteville, AR corporate boundaries. The Application Site Channel Study for KCYT Channel 244C3 using coordinates 36 degrees 08 minutes 49.7 seconds North Latitude, 94 degrees 11 minutes 13.3 seconds West Longitude (NAD 27), is fully spaced to all full power FM stations under Section 73.207 with two exceptions. The proposed application is short spaced to KRAV-FM, Channel 243C, Tulsa, OK by 3.54 km. and KKOW-FM, Channel 245C1, Pittsburg, KS by 2.5 km. Hog proposes to operate KCYT under Section 73.215 contour protection and operate with 4.1 kW at 166 meters HAAT with a non-directional antenna to avoid contour overlap with KRAV-FM and KKOW-FM.

The proposed KCYT modification would receive interference from four existing Low Power FM (LPFM) stations. KDUA-LP, Channel 243L1, Rogers, AR operates on a first adjacent channel to KCYT and is located 20.0 km. from the proposed KCYT transmitter site. KHBR-LP, Channel 244L1, Decatur, AR. KHBR-LP operates co-channel to KCYT and is located 31.7 km. from the proposed KCYT transmitter site. KTPV-LP, Channel 245L1, operates on a first adjacent channel to KCYT and is located 25.6 km. from the proposed KCYT transmitter site. KHEL-LP, Channel 247L1, Rogers, AR operates on a third adjacent channel and is located 21.1 km. from the proposed KCYT transmitter site. In FCC 12-29, "FOURTH REPORT AND ORDER AND THIRD ORDER ON RECONSIDERATION", released March 19, 2012, the FCC repealed the requirement that LPFM stations be certain minimum distances from nearby stations operating on "third-adjacent" channels. Therefore it is believed the KHEL-LP facility can continue to operate on Channel 247L1. Channel studies were conducted and alternate channels have been identified for the other three LPFM stations. Those channel studies and a detailed narrative are included as an exhibit in the Engineering section of this application. Hog understands when a minor modification application proposes a city of license change, the licensee is required to offer technical assistance to identify alternate channels to relocate LPFM stations. Hog also understands and agrees to reimburse those LPFM station licensees for reasonable expenses associated with changing frequencies.

The Application Site F(50,50) 70 dBu city grade contour covers 100% of the Fayetteville, Arkansas corporate boundaries.

The present KCYT Channel 244C2 licensed facility FCC F(50,50) 70 dBu contour currently serves 55.0 % of the Fort Smith, AR Urbanized Area. Therefore the proposed minor modification proposes to modify KCYT as an Intra-Urbanized Area move as the proposed modification is moving from one Urbanized Area (Fort Smith, AR-OK) to another (Fayetteville, Springdale, Rogers, AR-MO). See *Gearhart, Madras, Manzanita, and Seaside, Oregon*, DA 11-1209, rel. July 19, 2011 and FCC *Goleta and Oakview, CA* DA-11-1460A1, rel. August, 26, 2011. A commercial FM station is considered to serve an Urbanized Area when the station is licensed to a community located in an Urbanized Area or when the FCC F(50,50) 70 dBu contour of the station services a majority (greater than 50%) of an Urbanized Area. Fayetteville, the proposed city of license is located in the Fayetteville, Springdale, Rogers, AR-MO Urbanized Area and the proposed KCYT FCC F(50,50) 70 dBu contour will serve more than 50% of the Urbanized Area.

The current KCYT Channel 244C2 facility serves within the FCC F(50,50) 60 dBu protected contour an area of 7,957.2 sq. km and 271,082 persons (2010 U.S. Census). The proposed KCYT Channel 244C3 facility would serve within the FCC F(50,50) 60 dBu protected contour an area of 3,347.9 sq. km. and 377,689 persons (2010 U.S. Census). Thus, granting of this instant application will create a net loss in area of 4,609.3 sq. km and a net gain population served of 106,607. The current KCYT Channel 244C2 facility serves within the FCC F(50,50) 60 dBu protected contour an area of 7,957.2 sq. km and 271,082 persons (2010 U.S. Census). The proposed KCYT Channel 244C3 facility would serve within the FCC F(50,50) 60 dBu protected contour an area of 3,347.9 sq. km. and 377,689 persons (2010 U.S. Census). The area of common overlap

includes 497.5 sq. km. and 15,011 persons. Thus, granting of this instant application will create a net loss in area of 4,609.3 sq. km and a net gain population served of 106,607 persons.