APPLICATION FOR CONSTRUCTION PERMIT

NEW FM TRANSLATOR STATION
CLINTON, MISSOURI
BNPFT-20030312BBJ
103.9 MHz / 0.250 kW ND

COMMUNITY BROADCASTING, INC.

FEBRUARY, 2013

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APPLICATION FOR CONSTRUCTION PERMIT

The following engineering statement and attached exhibits have been prepared for **Community Broadcasting, Inc.** ("CBI"), applicant for a new FM translator facility to serve Clinton, Missouri, and are in support of their application for construction permit for that facility. This application is being filed as the long-form submission for the original short-form engineering proposal under FCC File No. BNPFT-20030312BBJ.[1]

The proposed facility would operate with an effective radiated power of 250 Watts at a center of radiation of 321.9 meters AMSL utilizing a non-directional antenna. The primary station for the proposed facility is KYLF(FM) at Adrian, Missouri.[2] The proposed facility would not operate as a fill-in translator for KYLF. Exhibit E-1 illustrates the predicted 60 dBu service contour of both the translator and its primary facility.

The center of radiation and effective radiated power are consistent with the power and height limitations table in Section 74.1235 of the Commission's Rules. The average terrain was determined through a 12 radial sample of a 30-second linearly interpolated terrain database. That study indicated that the average elevation along the 150 degree true radial was the lowest of any of the sampled radials. The average elevation on this radial was determined to be 214.9 meters AMSL. This yields a center of radiation height above average terrain of 107.0 meters.

This application proposes a change to the site specified in the original short-form application submitted in 2003. The change in the technical parameters would not, however, constitute a major

[1] The Facility ID for NEW / BNPFT-20030312BBJ at Clinton, Missouri is 140421.
[2] The Facility ID for KYLF(FM) at Adrian, Missouri is 174965.

change to the original short-form engineering proposal. Exhibit E-2 illustrates the predicted 60 dBu service contour resulting from the original short-form proposal along with the 60 dBu service contour based on the technical parameters described in this application. As this map demonstrates, there would be overlap of the 60 dBu service contours.

The coordinates specified in this application vary slightly from those originally submitted with the short-form proposal. No actual change in the facility location is proposed. Rather the difference in the coordinates is a result of a modification of the ASR data by the owner of that structure. The proposed facility would not affect any of the Appendix A markets. The closest Appendix A market to the proposed facility is the Kansas City market. Exhibit E-2 illustrates that the site for the proposed facility would lie outside the market boundaries, outside the market grid, and outside the market grid buffer.

The proposed facility would comply with the contour overlap and interference provisions of Section 74.1204 of the Commission's Rules. Exhibit E-3 is a tabular based allocation study for the proposed facility. As this study demonstrates, there would be no areas of prohibited contour overlap between the proposed facility, and any other proposed or authorized facility of relevance. Exhibit E-4 illustrates the tabular study in a graphical contour format.

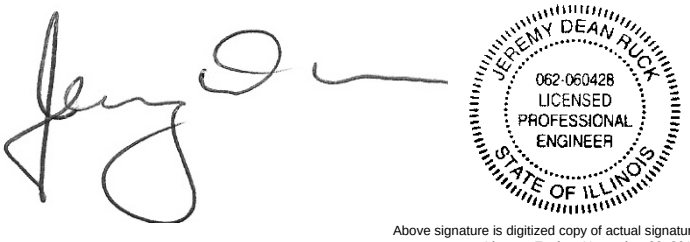
As indicated on the form pages, the proposed facility would operate with an effective radiated power of 250 Watts. Exhibit E-5 is a single channel spacing study for the proposed translator. As this study demonstrates, the requisite intermediate frequency spacing requirements would be met.

CBI has several other pending translator applications and licensed translator facilities in the region. There is no overlap of the proposed 60 dBu service contour with the 60 dBu service contour of any other CBI translator facility. As a result, the proposed facility would be in compliance with the multiple translator provisions of the Commission's Rules.

The facility specified in this application would not constitute a significant environmental impact, and is exempt from environmental processing. The translator would utilize an existing tower that is registered with the Commission. The addition of the translator antenna to this tower would not increase the existing environmental impact already present from the facility.

In addition, the proposed facility would not constitute a radiofrequency radiation hazard to persons at the site. As indicated on the form pages, the proposed facility would operate with a Shively model 6812B-2 model antenna. The Commission's *FM Model* software package predicts a maximum power density of 0.34 $\mu W/cm^2$ at a distance of 52 meters from the base of the tower. This value is considerably less than the maximum value permissible under the applicable safety standards. CBI certifies that it will coordinate with all present and future users of the site to ensure that workers having access to the site are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Such coordination will include, but is not necessarily limited to, a reduction in transmitter power or cessation of operation.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2013

Jeremy D. Ruck, PE
February 28, 2013

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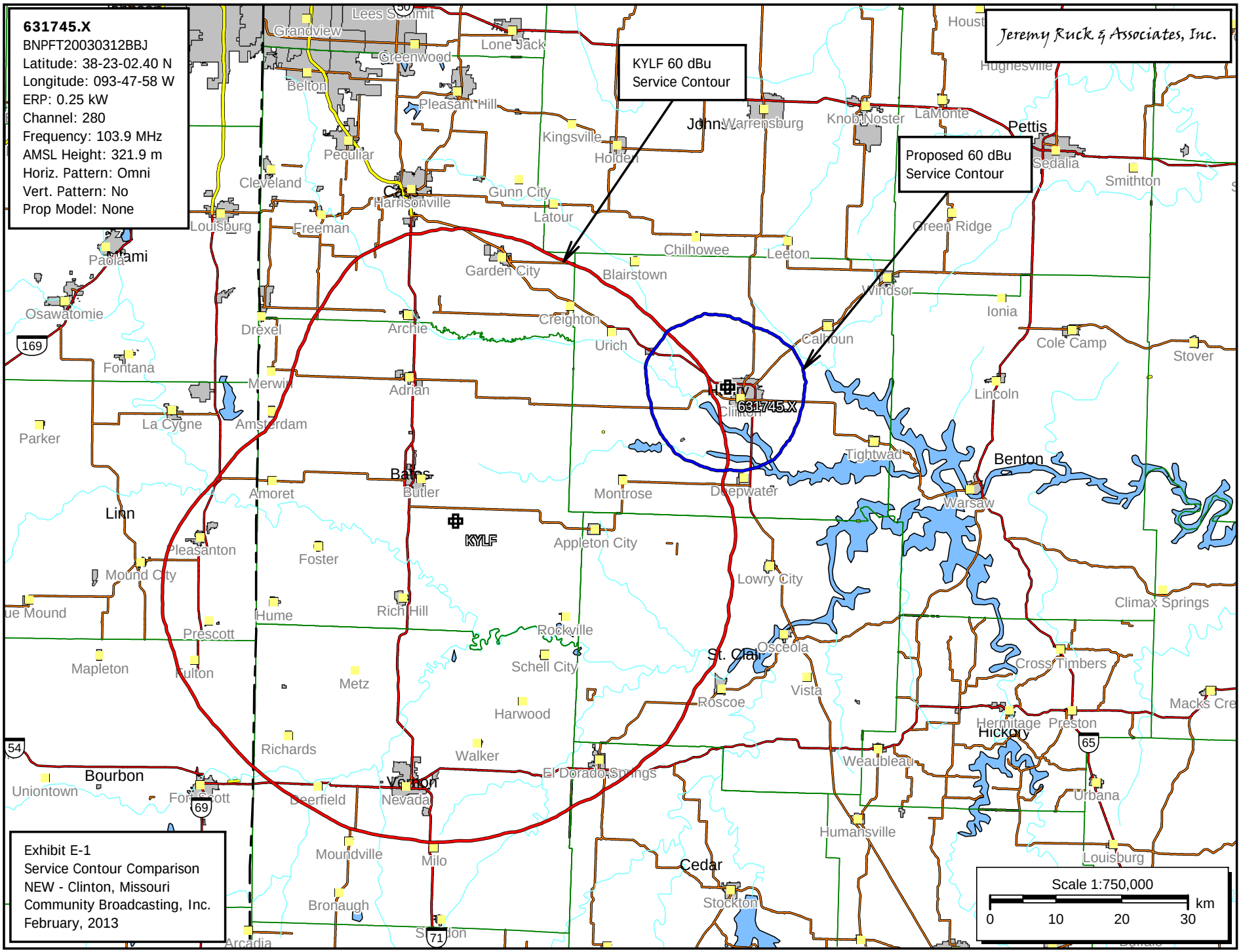
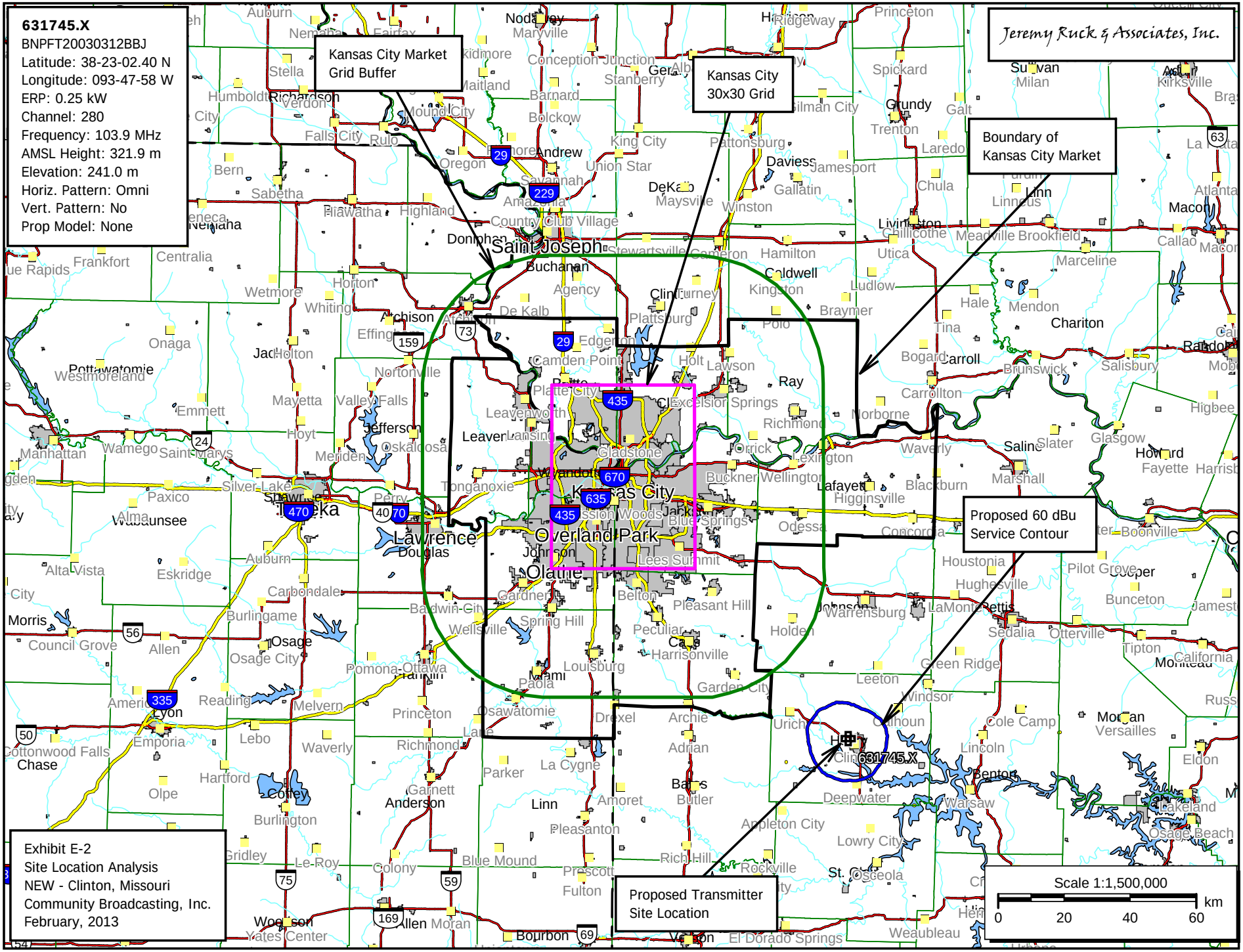

631745.X
BNPFT20030312BBJ
Latitude: 38-23-02.40 N
Longitude: 093-47-58 W
ERP: 0.25 kW
Channel: 280
Frequency: 103.9 MHz
AMSL Height: 321.9 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Jeremy Ruck & Associates, Inc.
KYLF 60 dBu
Service Contour
Proposed 60 dBu
Service Contour
631745.X
KYLF
Exhibit E-1
Service Contour Comparison
NEW - Clinton, Missouri
Community Broadcasting, Inc.
February, 2013
Scale 1:750,000
0 10 20 30 km
Lees Summit
Grandview
Greenwood
Lone Jack
Belton
Pleasant Hill
Peculiar
Cleveland
Harrisonville
Gunn City
Latour
Louisburg
Freeman
Paola
Osawatomie
Garden City
Blairstown
Chilhowee
Leeton
Green Ridge
Windsor
Ionia
Creighton
Archie
Drexel
Urich
Calhoun
Cole Camp
Stover
Fontana
Merwin
Adrian
Lincoln
La Cygne
Amsterdam
Parker
Tightwad
Benton
Amoret
Butler
Montrose
Deepwater
Warsaw
Linn
Appleton City
Pleasanton
Foster
Mound City
Lowry City
Climax Springs
Hume
Rich Hill
Rockville
Prescott
Osceola
St. Clair
Mapleton
Fulton
Schell City
Metz
Cross Timbers
Vista
Roscoe
Harwood
Hermitage
Preston
Hickory
Macks Creek
Richards
Walker
Weaubleau
El Dorado Springs
Bourbon
Uniontown
Deerfield
Nevada
Urbana
Humansville
Moundville
Milo
Cedar
Louisburg
Bronaugh
Stockton
Arcadia
Johnstown
Warrensburg
Knob Noster
LaMonte
Pettis
Sedalia
Smithton
Hughesville
Houst
Kingsville
Holden
169
54
69
71
65


631745.X
BNPFT20030312BBJ
Latitude: 38-23-02.40 N
Longitude: 093-47-58 W
ERP: 0.25 kW
Channel: 280
Frequency: 103.9 MHz
AMSL Height: 321.9 m
Elevation: 241.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Kansas City Market Grid Buffer
Kansas City 30x30 Grid
Boundary of Kansas City Market
Jeremy Ruck & Associates, Inc.
Proposed 60 dBu Service Contour
Proposed Transmitter Site Location
631745.X
Scale 1:1,500,000
0 20 40 60 km
Exhibit E-2
Site Location Analysis
NEW - Clinton, Missouri
Community Broadcasting, Inc.
February, 2013
Saint Joseph
Kansas City
Lawrence
Overland Park
Olathe
Topeka

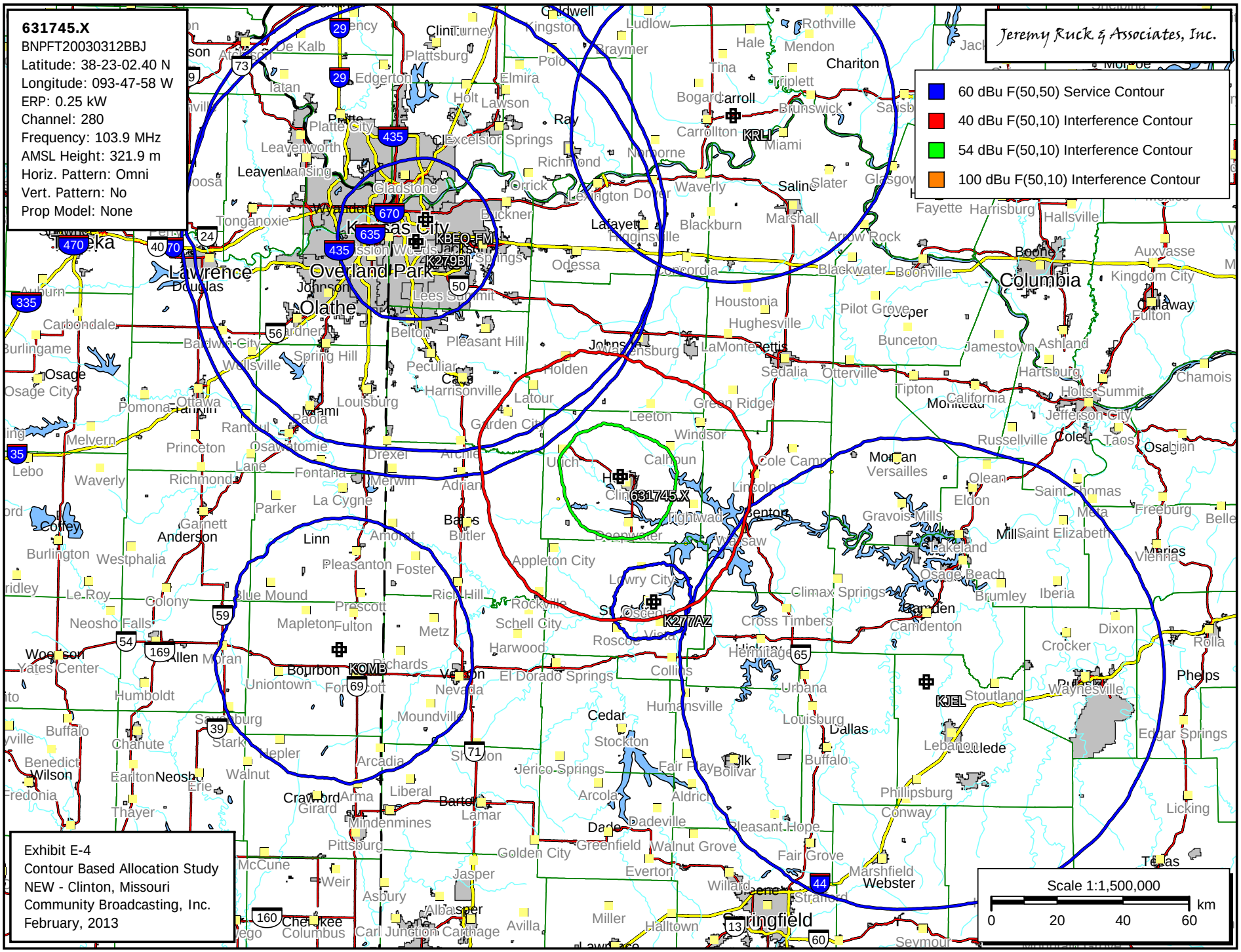
Jeremy Ruck & Associates, Inc.
Consulting Engineers - Canton, Illinois

Exhibit E-3 - Tabular Allocation Study
NEW - Clinton, Missouri

REFERENCE CH# 280D - 103.9 MHz, Pwr= 0.25 kW, HAAT= 88.4 M, COR= 321.9 M DISPLAY DATES
38 23 02.4 N. Average Protected F(50-50)= 12.12 km DATA 02-28-13
93 47 58.0 W. Omni-directional SEARCH 02-28-13

CH CITY	CALL STATE	TYPE ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
280D Clinton	631745 MO	APP _C_	0.0 180.0	0.00 BNPFT20030312BBJ	38 23 03.0 93 47 58.0	0.250 89	44.4 322	12.9 Community Broadcasting, In	-55.3*	-49.9*
280C3 Fort Scott	KOMB LIC KS	_C_	238.3 57.7	99.81 BLH20070906AAT	37 54 28.0 94 46 02.0	25.000 100	113.6 368	39.1 Fort Scott Broadcasting Co	-26.2*	17.5
280C2 Malta Bend	KRLI LIC NCX MO		17.3 197.6	114.47 BLH20060301ABF	39 21 59.0 93 24 12.0	12.000 268	122.0 479	50.3 Kanza, Inc.	-18.1*	28.5
279C0 Lebanon	KJEL LIC _CN MO		124.0 304.6	111.39 BLH19881115KC	37 49 10.0 92 44 51.0	100.000 300	107.9 620	74.1 Waynesville/ Lebanon Licen	-9.0	18.6
277C Kansas City	KPRS LIC _CN MO		319.1 138.6	93.27 BLH19870522KA	39 00 57.0 94 30 24.0	100.000 303	10.0 577	71.9 Carter Broadcast Group, In	70.8	20.4
277D Osceola	K277AZ LIC _C_ MO		165.2 345.2	39.33 BLFT20070726AHP	38 02 31.0 93 41 04.0	0.250 89	1.1 334	11.4 Community Broadcasting, In	24.8	26.6
282C0 Kansas City	KBEQ-FM LIC _CY MO		323.0 142.6	97.60 BLH19850813KT	39 04 59.0 94 28 49.0	100.000 301	9.8 562	70.7 Wilks License Company-kans	75.5	25.9
279D Kansas City	K279BI LIC _C_ MO		319.1 138.6	94.20 BLFT20100309ABW	39 01 20.0 94 30 49.0	0.250 349	36.0 621	23.9 Susquehanna Radio Corp.	45.8	52.3

Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West 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.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Jeremy Ruck & Associates, Inc.
60 dBu F(50,50) Service Contour
40 dBu F(50,10) Interference Contour
54 dBu F(50,10) Interference Contour
100 dBu F(50,10) Interference Contour
KBEQ-FM
K279BI
KRLI
K277AZ
KOMB
KJEL
631745.X
Exhibit E-4
Contour Based Allocation Study
NEW - Clinton, Missouri
Community Broadcasting, Inc.
February, 2013
Scale 1:1,500,000
0 20 40 60 km

Jeremy Ruck & Associates, Inc.
Consulting Engineers - Canton, Illinois
Exhibit E-5 - Single Channel Spacing Study
NEW - Clinton, Missouri

REFERENCE
38 23 02.4 N.
93 47 58.0 W.

CLASS = D
Current Spacings to 3rd Adj.
Channel 280 - 103.9 MHz

DISPLAY DATES
DATA 02-28-13
SEARCH 02-28-13

Call	Channel	Location		Azi	Dist	FCC	Margin
631745	APP 280D	Clinton	MO	0.0	0.01	83.0	-83.0
K277AZ	LIC 277D	Osceola	MO	165.2	39.28	92.0	-52.7
KPRS	LIC 277C	Kansas City	MO	319.1	93.29	93.5	-0.21
KOMB	LIC 280C3	Fort Scott	KS	238.3	99.95	92.5	7.5
KRLI	LIC-N 280C2	Malta Bend	MO	17.3	114.34	104.5	9.8
KBEQ-FM	LIC 282C0	Kansas City	MO	323.0	97.60	83.5	14.1
KJEL	LIC 279C0	Lebanon	MO	124.0	111.53	93.5	18.0
K281AT	LIC 281D	Lebanon	MO	127.0	129.79	103.0	26.8
K279BI	LIC 279D	Kansas City	MO	319.1	94.22	60.5	33.7

All separation margins include rounding