

EXHIBIT 9
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ANALOG TV BROADCAST STATION PROTECTION

Ft. Smith 46, Inc.
Siloam Springs, AR

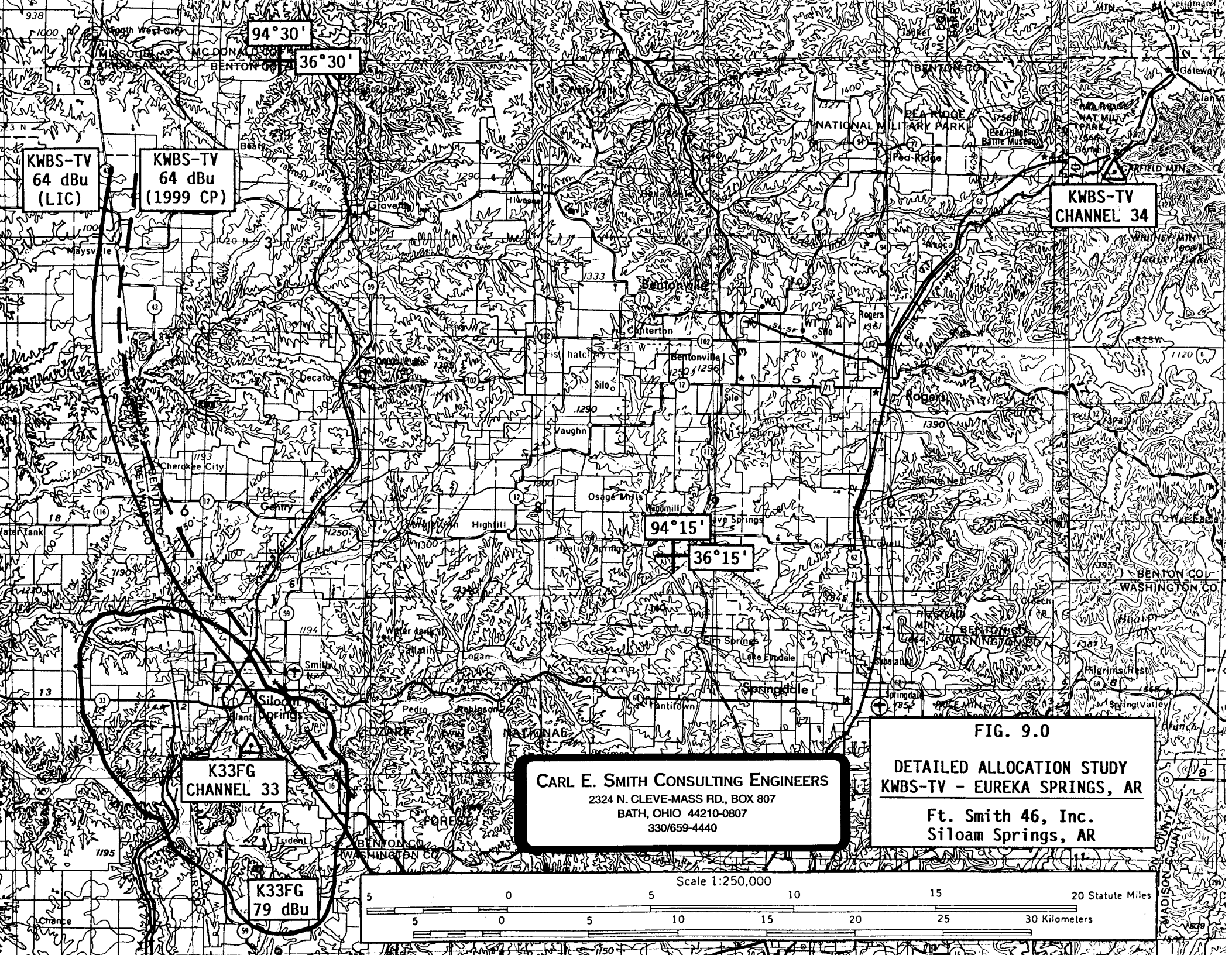
With one exception, the presently licensed K33FG operating facilities will provide the required contour protection to all analog TV broadcast stations requiring protection consideration. This exception involves KWBS-TV - Eureka Springs, Arkansas, which was recently licensed to operate on Channel 34. The licensed KWBS-TV operating facilities are based on a construction permit modification application (BMPCT-20000616AGM) which was filed after November 29, 1999 and, thus, should not be entitled to protection from K33FG in obtaining its initial Class A license. Prior to filing this construction permit modification application, KWBS-TV had been authorized facilities based on an earlier construction permit modification application (BMPCT-19991008AAF), which had been filed prior to November 29, 1999. Thus, the facilities authorized by this prior construction permit must be protected by K33FG in attempting to obtain its initial Class A license.

Figure 9.0 is a map exhibit depicting the 64 dBu protected contours for both the licensed KWBS-TV operating facilities and the facilities authorized by its 1999 construction permit in relation to the 79 dBu interfering contour for the presently licensed operation of K33FG. As shown in this figure, the 79 dBu interfering contour for the presently licensed K33FG operating facilities very slightly overlaps the 64 dBu contour for both the presently licensed KWBS-TV operating facilities and the facilities specified in their 1999 construction permit. Thus, the presently licensed operation of K33FG fails to provide the required contour protection to the KWBS-TV 1999 construction permit facilities

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and would also fail to protect the KWBS-TV licensed facilities if such protection was required.

The applicant, however, has obtained the written consent of the licensee of KWBS-TV to accept any interference which results from this small amount of prohibited contour overlap with the KWBS-TV 64 dBu contour, which should permit K33FG to be granted a Class A license in spite of this prohibited contour overlap. A copy of this consent letter from the licensee of KWBS-TV has been included as a separate attachment to Exhibit 9 of this application. If it is deemed to be necessary, a waiver of Section 73.6011 of the FCC Rules is respectfully requested, based on this consent, to permit K33FG to be granted a Class A license to cover its presently licensed operating facilities in spite of this small amount of prohibited contour overlap with KWBS-TV.



KWBS-TV
64 dBu
(LIC)

KWBS-TV
64 dBu
(1999 CP)

KWBS-TV
CHANNEL 34

K33FG
CHANNEL 33

K33FG
79 dBu

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 9.0
DETAILED ALLOCATION STUDY
KWBS-TV - EUREKA SPRINGS, AR
Ft. Smith 46, Inc.
Siloam Springs, AR

