

**Proposed Minor Modification**

The proposed minor change of K205FF specifies a change from CH 205 to CH 216. A waiver of Section 74.1233(a)(1) is hereby requested due to the displacement of K205FF by KWCV, CH 205, Walnut Ridge, AR (BPED-20130904ACL). An interference study determined that it is not technically feasible to operate on a first, second, or third adjacent channel, thus in order to continue to provide service to listeners this move to an alternate frequency (CH 216) is necessary and believed to be in the public interest to do so.

The only change proposed is the move from CH 205 to CH 216. All other technical parameters of the facility will remain the same as is indicated below:

|                          | <b>LIC</b>              | <b>Proposed Modification</b> |
|--------------------------|-------------------------|------------------------------|
| Channel                  | 205                     | 216                          |
| Class                    | D                       | D                            |
| Geographical Coordinates | 35 54 26 / 90 41 38     | 35 54 26 / 90 41 38          |
| ASRN                     | 1039870                 | 1039870                      |
| Site AMSL                | 126.8 m                 | 126.8 m                      |
| Tower AGL                | 104.9 m                 | 104.9 m                      |
| COR AGL                  | 64 m                    | 64 m                         |
| ERP                      | 0.01 kW non-DA (V only) | 0.01 kW non-DA (V only)      |
| COR AMSL                 | 191 m                   | 191 m                        |
| HAAT                     | 96 m                    | 96 m                         |

The below listed pages of this exhibit contains information as indicated.

- Page 2            Tabulation of HAAT / distance to 60 dBu contour
- Page 3            60 dBu contour map
- Page 4-5        Allocation study for CH 216
- Page 6-7        Request for waiver of Section 74.1233(a)(1)

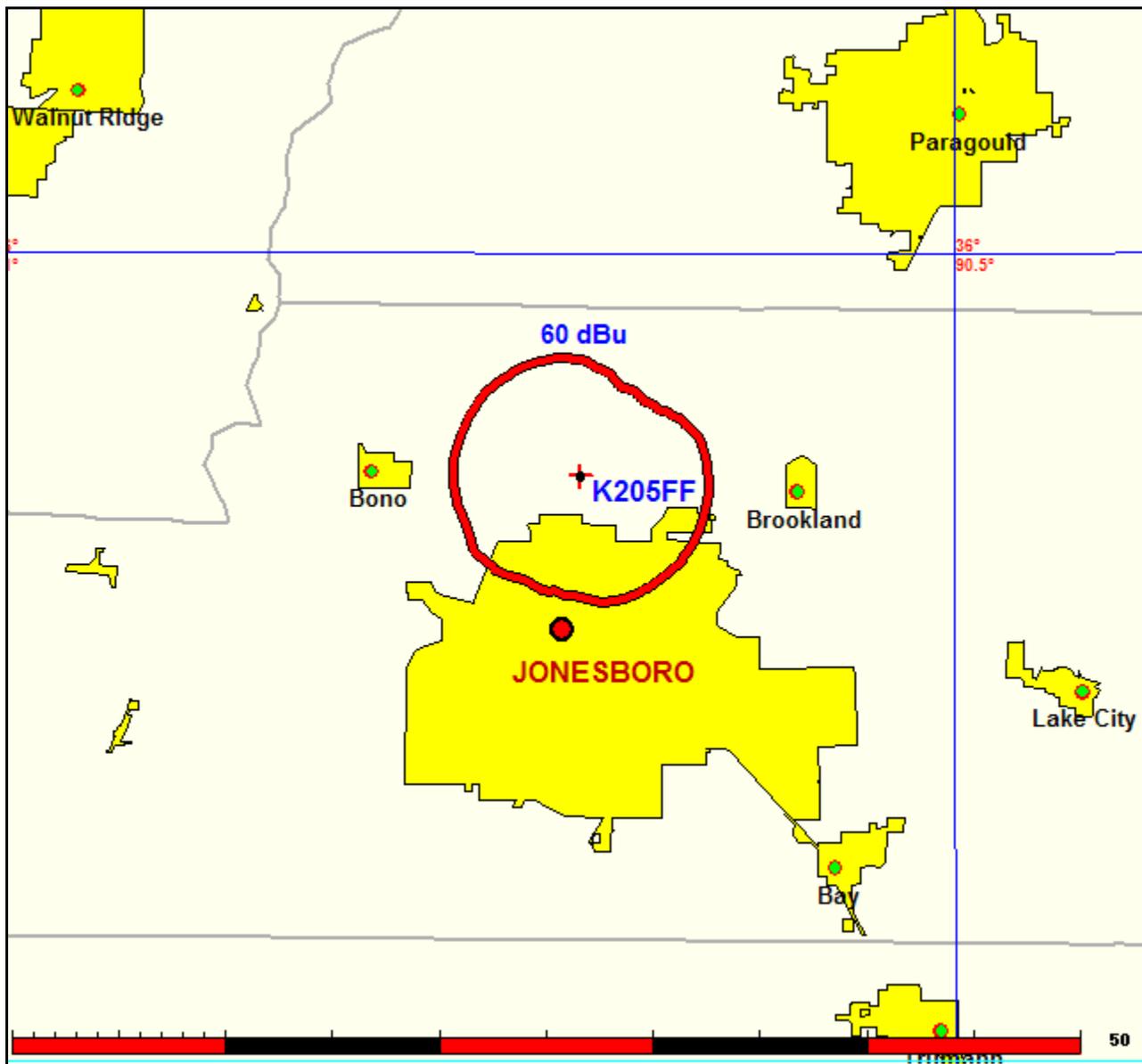
Tabulation of HAAT / distance to 60 dBu contour

| CH 216 | 35 54 26 / 90 41 38 | 0.01 kW ERP non-da | 191 m COR AMSL | 96 m HAAT |       |       |       |
|--------|---------------------|--------------------|----------------|-----------|-------|-------|-------|
|        | Azi.                | AV EL              | HAAT           | ERP kW    | dBk   | Field | 60-F5 |
| 000    | 107.5               | 83.5               | 0.0100         | -20.00    | 1.000 | 5.32  |       |
| 010    | 117.1               | 73.9               | 0.0100         | -20.00    | 1.000 | 5.00  |       |
| 020    | 125.1               | 65.9               | 0.0100         | -20.00    | 1.000 | 4.73  |       |
| 030    | 129.5               | 61.5               | 0.0100         | -20.00    | 1.000 | 4.57  |       |
| 040    | 129.8               | 61.2               | 0.0100         | -20.00    | 1.000 | 4.56  |       |
| 050    | 124.3               | 66.7               | 0.0100         | -20.00    | 1.000 | 4.75  |       |
| 060    | 108.5               | 82.5               | 0.0100         | -20.00    | 1.000 | 5.29  |       |
| 070    | 95.5                | 95.5               | 0.0100         | -20.00    | 1.000 | 5.71  |       |
| 080    | 90.2                | 100.8              | 0.0100         | -20.00    | 1.000 | 5.87  |       |
| 090    | 86.3                | 104.7              | 0.0100         | -20.00    | 1.000 | 5.99  |       |
| 100    | 83.2                | 107.8              | 0.0100         | -20.00    | 1.000 | 6.08  |       |
| 110    | 82.4                | 108.6              | 0.0100         | -20.00    | 1.000 | 6.10  |       |
| 120    | 80.6                | 110.4              | 0.0100         | -20.00    | 1.000 | 6.15  |       |
| 130    | 78.9                | 112.1              | 0.0100         | -20.00    | 1.000 | 6.20  |       |
| 140    | 80.4                | 110.6              | 0.0100         | -20.00    | 1.000 | 6.16  |       |
| 150    | 80.2                | 110.8              | 0.0100         | -20.00    | 1.000 | 6.16  |       |
| 160    | 80.9                | 110.1              | 0.0100         | -20.00    | 1.000 | 6.14  |       |
| 170    | 83.2                | 107.8              | 0.0100         | -20.00    | 1.000 | 6.08  |       |
| 180    | 94.6                | 96.4               | 0.0100         | -20.00    | 1.000 | 5.74  |       |
| 190    | 98.1                | 92.9               | 0.0100         | -20.00    | 1.000 | 5.63  |       |
| 200    | 97.7                | 93.3               | 0.0100         | -20.00    | 1.000 | 5.64  |       |
| 210    | 97.9                | 93.1               | 0.0100         | -20.00    | 1.000 | 5.63  |       |
| 220    | 88.1                | 102.9              | 0.0100         | -20.00    | 1.000 | 5.94  |       |
| 230    | 84.6                | 106.4              | 0.0100         | -20.00    | 1.000 | 6.04  |       |
| 240    | 87.5                | 103.5              | 0.0100         | -20.00    | 1.000 | 5.95  |       |
| 250    | 90.7                | 100.3              | 0.0100         | -20.00    | 1.000 | 5.86  |       |
| 260    | 88.2                | 102.8              | 0.0100         | -20.00    | 1.000 | 5.93  |       |
| 270    | 88.4                | 102.6              | 0.0100         | -20.00    | 1.000 | 5.93  |       |
| 280    | 87.1                | 103.9              | 0.0100         | -20.00    | 1.000 | 5.96  |       |
| 290    | 88.9                | 102.1              | 0.0100         | -20.00    | 1.000 | 5.91  |       |
| 300    | 90.2                | 100.8              | 0.0100         | -20.00    | 1.000 | 5.87  |       |
| 310    | 89.8                | 101.2              | 0.0100         | -20.00    | 1.000 | 5.89  |       |
| 320    | 93.2                | 97.8               | 0.0100         | -20.00    | 1.000 | 5.78  |       |
| 330    | 95.2                | 95.8               | 0.0100         | -20.00    | 1.000 | 5.72  |       |
| 340    | 99.0                | 92.0               | 0.0100         | -20.00    | 1.000 | 5.60  |       |
| 350    | 102.6               | 88.4               | 0.0100         | -20.00    | 1.000 | 5.48  |       |

(yellow highlighted values establish average HAAT)

60 dBu contour map

There is no change specified to the technical parameters of K205FF thus there is no change to the 60 dBu contour.



Allocation Study

CH 216 35 54 26 / 90 41 38 0.01 kW ERP non-da 191 m COR AMSL 96 m HAAT

| CH<br>CITY | CALL | TYPE | ANT<br>STATE | AZI.<br><-- | DIST<br>FILE # | LAT.<br>LNG. | Pwr (kW)<br>HAAT (M) | INT (km)<br>COR (M) | PRO (km)<br>LICENSEE | *IN*<br>(Overlap in | *OUT* |
|------------|------|------|--------------|-------------|----------------|--------------|----------------------|---------------------|----------------------|---------------------|-------|
|------------|------|------|--------------|-------------|----------------|--------------|----------------------|---------------------|----------------------|---------------------|-------|

First, second, and third adjacent relationships:

|                    |         |     |          |                |                          |                          |                |              |                                    |         |         |
|--------------------|---------|-----|----------|----------------|--------------------------|--------------------------|----------------|--------------|------------------------------------|---------|---------|
| 213C2<br>Jonesboro | KAOG    | LIC | DC<br>AR | 224.7<br>44.6  | 15.2<br>BLED20000127AAM  | 35 48 36.0<br>90 48 45.0 | 40.000<br>121  | 3.3<br>200   | 33.5<br>American Family Associatio | 5.9     | -18.5*< |
| 214C1<br>Dyersburg | WZKV    | LIC | EN<br>TN | 78.5<br>259.2  | 110.9<br>BLED19931013KA  | 36 06 00.0<br>89 29 12.0 | 100.000<br>171 | 7.9<br>259   | 62.3<br>Educational Media Foundati | 97.2    | 48.4    |
| 215C3<br>Newark    | KLLN    | LIC | CN<br>AR | 253.4<br>73.0  | 70.8<br>BLED19860116KD   | 35 43 25.0<br>91 26 40.0 | 4.000<br>139   | 48.8<br>236  | 32.5<br>Cedar Ridge School Distric | 16.1    | 30.0    |
| 216C1<br>Memphis   | WKNO-FM | LIC | C<br>TN  | 136.5<br>317.0 | 115.1<br>BLED20010418AAF | 35 09 14.0<br>89 49 19.0 | 100.000<br>175 | 159.9<br>268 | 62.3<br>Mid-south Public Communica | -51.0*< | 32.3    |
| 217C1<br>Van Buren | KBIY    | LIC | DE<br>MO | 348.8<br>168.6 | 135.8<br>BLED20010511ABG | 37 06 25.0<br>90 59 30.0 | 100.000<br>150 | 89.6<br>379  | 59.8<br>New Life Evangelistic Cent | 40.7    | 68.3    |
| 218D<br>Jonesboro  | K218DE  | LIC | V<br>AR  | 0.0<br>0.0     | 0.0<br>BLFT20010919AAN   | 35 54 26.0<br>90 41 38.0 | 0.250<br>91    | 1.1<br>186   | 11.5<br>Calvary Chapel Of Twin Fal | -6.4*<  | -11.7*< |

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM

Contour distances are on direct line to and from reference station. 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), Beamtillt(Y,N,X)

""affixed to 'IN' or 'OUT' values = site inside protected contour.

< = Contour Overlap

**Allocation Study**

Operating on Channel 216, K205FF will be located within the 60 dBu contour of the below stations as indicated:

KAOG (LIC), CH 213, Jonesboro, AR

|   |             |
|---|-------------|
| KAOG signal strength at the K205FF site   | 74.1 dBu    |
| K205FF corresponding interference contour | 114.1 dBu   |
| Distance to K205FF interference contour   | 44.0 meters |

K218DE, CH 218, Jonesboro, AR

Located at same site as K205FF

For purposes of this study, only KAOG will be considered as the worst case situation.

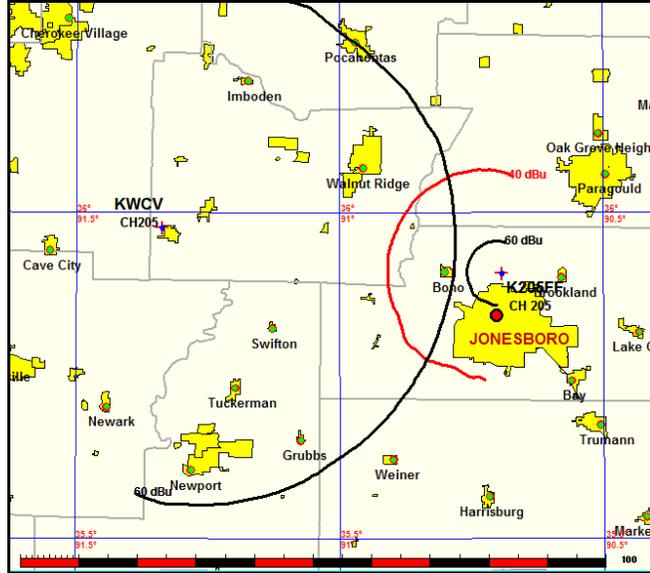
The K205FF antenna is located 64.0 meters above ground. The interference contour to KAOG extends out 44.0 meters, therefore no interference will reach the ground by a margin of 20.0 meters. Furthermore there are no structures at the site that are tall enough to be within the above-ground predicted interference area (see below map). Therefore, a waiver of Section 74.1204(d) is respectfully requested based on the showing of no population within the area of predicted interference.



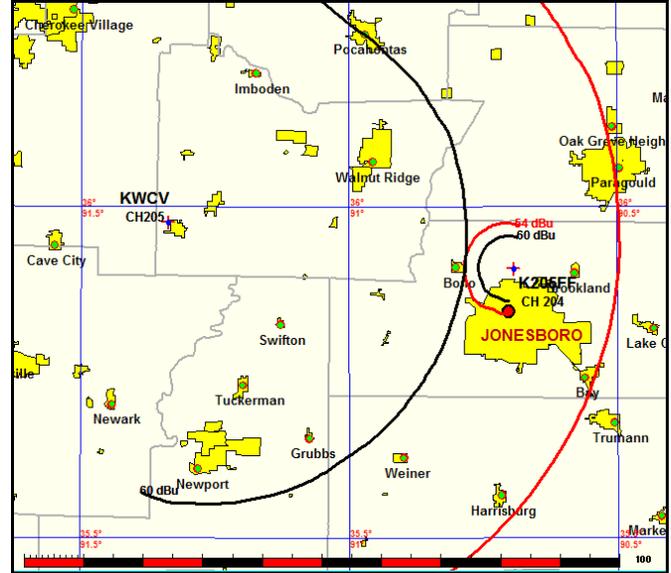
Displacement Study

The use of CH 205, K205FF's currently licensed channel, and first adjacent channels 204 and 206 are precluded from use by K205FF as there would be prohibited overlap with and cause interference to KWCV, CH 205, Walnut Ridge, AR (BPED-20130904ACL) as is indicated on the below maps:

K205FF, CH 205 to KWCV, CH 205

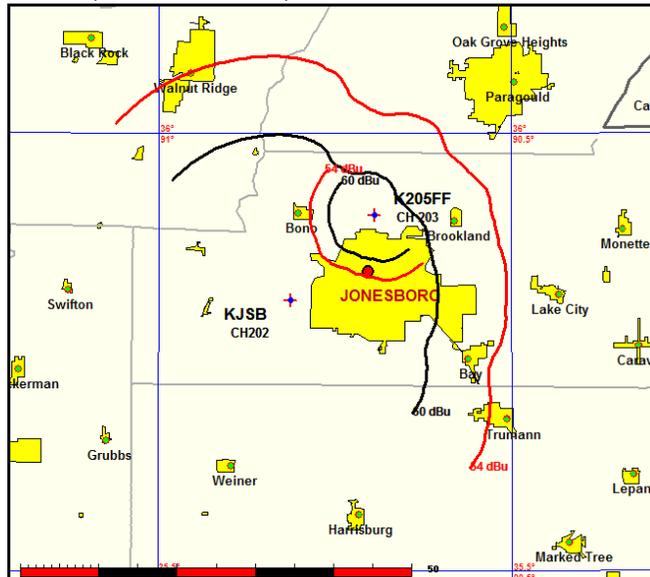


K205FF, CH 204/CH 206 to KWCV, CH 205

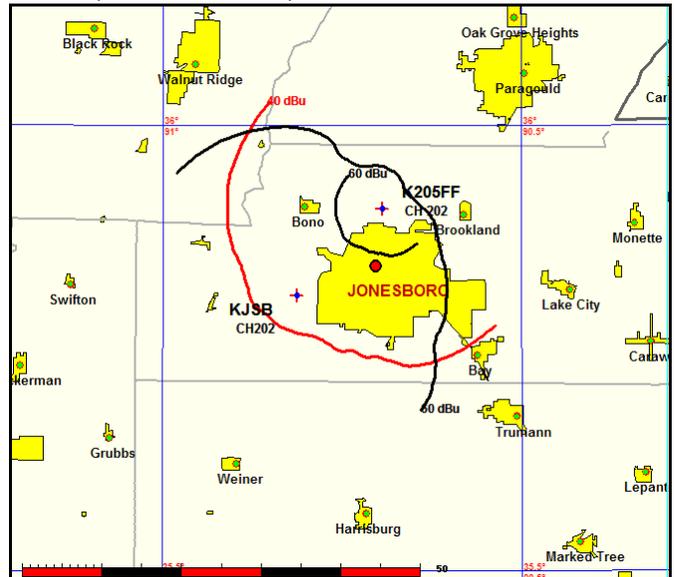


The use of second adjacent CH 203 and third adjacent CH 202 is precluded from use by K205FF as there would be prohibited overlap with and cause interference to KJSB, CH 202, Jonesboro, AR, as is indicated on the below maps:

K205FF, CH 203 to KJSB, CH 202



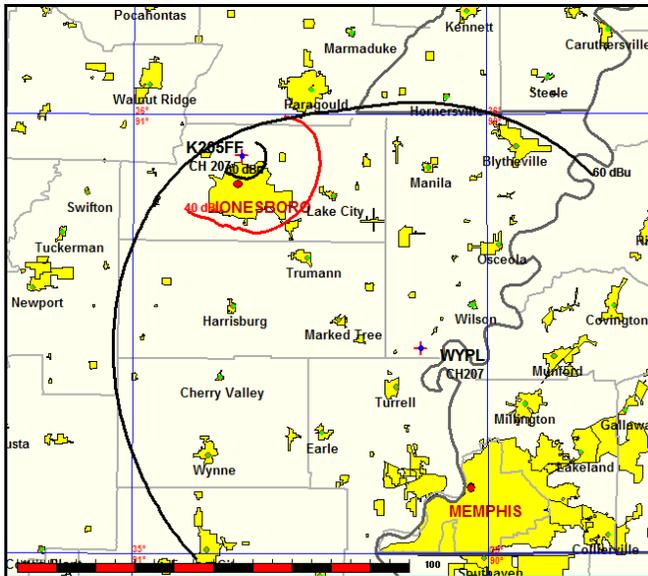
K205FF, CH 202 to KJSB, CH 202



Displacement Study

The use of second adjacent CH 207 and third adjacent CH 208 is precluded from use by K205FF as it would have prohibited overlap with and cause interference to WYPL, CH 207, Memphis, TN as is indicated on the below maps:

K205FF, CH 207 to WYPL, CH 207



K205FF, CH 208 to WYPL, CH 207

