

Exhibit 13 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**KY3, Inc.**  
K15CZ Springfield, Missouri  
Facility ID 49186  
Ch. 15 15 kW (Max-DA)

*KY3, Inc.* (“*KY3*”) is the licensee of UHF low-power television station K15CZ, Channel 15, Springfield, Missouri. *KY3* proposes herein to modify the K15CZ digital flash-cut Construction Permit<sup>1</sup> to specify a change in location, ERP, and antenna pattern.

**Nature of the Proposal**

The antenna system proposed herein is the same directional antenna currently employed by the operating K15CZ facility. The antenna will be side-mounted on an existing antenna structure (Antenna Structure Registration number 1007779), albeit with a different orientation.

**Exhibit 13 - Figure 1** depicts the coverage contours of the present K15CZ analog<sup>2</sup> and proposed digital facilities. As shown on the provided map, the coverage area of the proposed site overlaps with that of the licensed site. Therefore, the proposed facility is considered a minor change according to the criteria specified in §73.3572 of the Commission’s Rules.

**Allocation Considerations**

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)<sup>3</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

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<sup>1</sup> See file number BDFCDTL-20081014AEG

<sup>2</sup> *KY3* has constructed the analog facility specified in file number BPTTL-20120511AFT and applied for a license to cover that construction. See BLTTL-20121113AFF.

<sup>3</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.**

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The results, summarized in **Exhibit 13 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations.) Accordingly, the instant proposal complies with §74.705 - §74.710 regarding interference protection to digital television, low power television, television translator, and Class A television facilities.

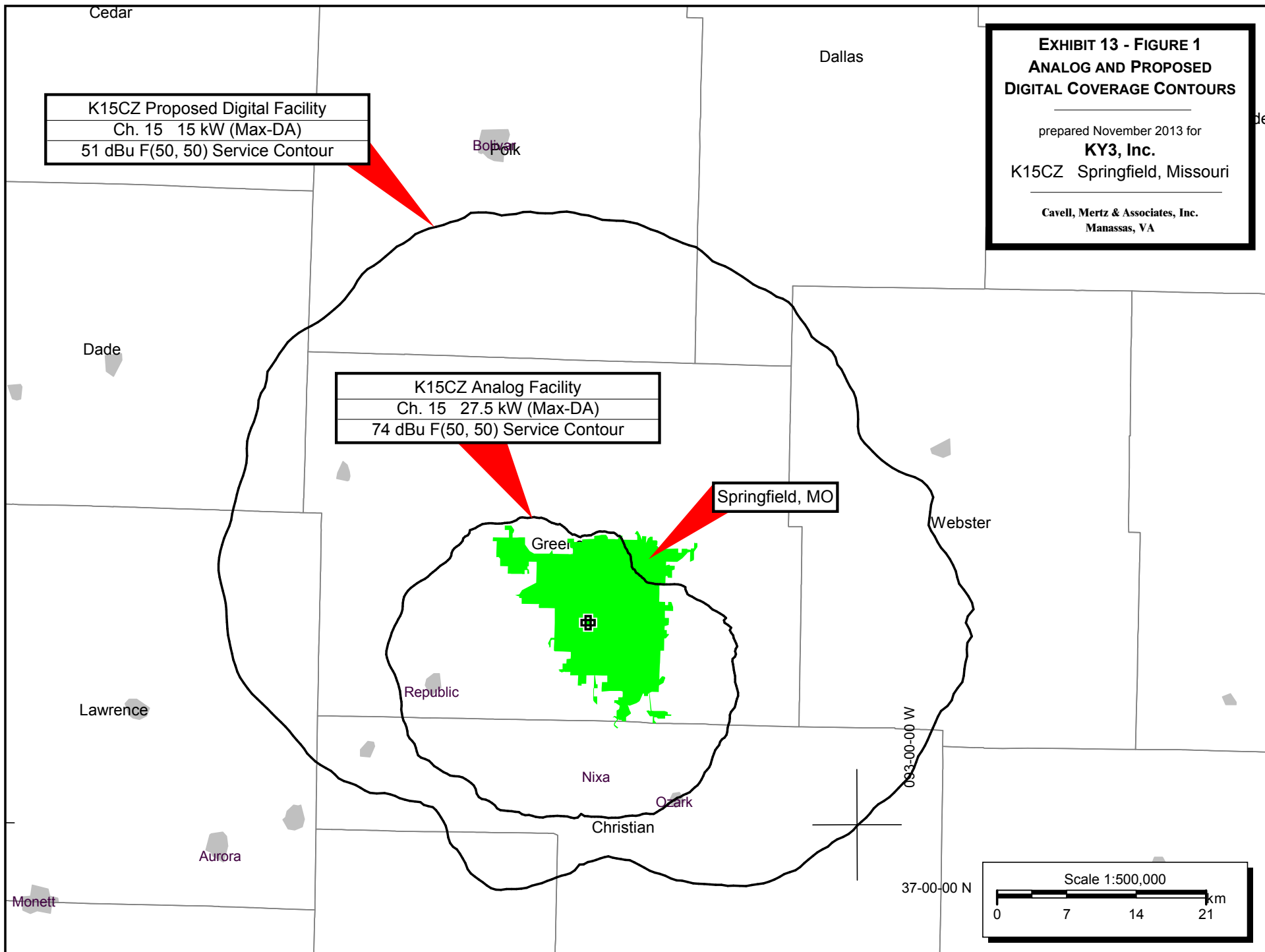
**International Coordination**

The proposed transmitter site is located over 1,000 km from any international border and is well beyond the coordination distances specified in the agreements with both Canada and Mexico.

**Other Allocation Considerations**

The nearest FCC monitoring station is at Grand Island, Nebraska, at a distance of 607 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no non-directional AM stations located within one kilometer and no directional AM stations located within 3.2 km of the proposed site, according to information extracted from the Commission's engineering database.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.



**EXHIBIT 13 - FIGURE 1**  
**ANALOG AND PROPOSED**  
**DIGITAL COVERAGE CONTOURS**

prepared November 2013 for  
**KY3, Inc.**  
K15CZ Springfield, Missouri

Cavell, Mertz & Associates, Inc.  
Manassas, VA

**Exhibit 13 - Table I**  
**INTERFERENCE STUDY RESULTS**

prepared for  
**KY3, Inc.**  
K15CZ Springfield, MO  
Facility ID: 49186  
Ch. 15 15 kW 465.2 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
14	KHMF-CA	Bentonville, AR	BDFCDTA-20120719ABE			--- No Interference ---		
14	KHMF-CA	Bentonville, AR	BLTT-19940525JL			--- No Interference ---		
14	K14OM-D	Clarksville, AR	BNPDTL-20100504AMK			--- No Interference ---		
14	K14NX-D	Pittsburg, KS	BNPDTL-20100106AGD			--- No Interference ---		
14	K14OI-D	Columbia, MO	BMPDTL-20110318ABA			--- No Interference ---		
15	DK15FW	Batesville, AR	BMPDTL-20120224AAP			--- No Interference ---		
15	DK15FW	Batesville, AR	BSTA-20121025AAH			--- No Interference ---		
15	KHOG-TV	Fayetteville, AR	BLCDT-20020904AAX	557,896	25,235	25,289	54	0.010 %
15	WSEC	Jacksonville, IL	BLEDT-20031031ADN			--- No Interference ---		
15	W15BU-D	Johnson City, IL	BLDTA-20090804AAF			--- No Interference ---		
15	KMJT-LP	Ogden, KS	BLTTL-19940203JC			--- No Interference ---		
15	K15IJ-D	Pittsburg, KS	BNPDTL-20100106AGE			--- No Interference ---		
15	K15CN	Salina, KS	BMPDTL-20121022AAF			--- No Interference ---		
15	K15CN	Salina, KS	BSTA-20121031ABJ			--- No Interference ---		
15	K15DD-D	Wichita, KS	BLDTL-20110331AHX			--- No Interference ---		
15	KPOB-TV	Poplar Bluff, MO	BLCDT-20090623ABU			--- No Interference ---		
15	KMOS-TV	Sedalia, MO	BLEDT-20030108ABK	734,045	763	4,408	3,645	0.497 %
15	K15AA-D	Hugo, OK	BLDDT-20100226AFI			--- No Interference ---		
15	K15DA	Tulsa, OK	BLTTL-19961024JC			--- No Interference ---		
15	W15CH	Memphis, TN	BLTTL-20111121DBI			--- No Interference ---		
16	K16JO-D	Clarksville, AR	BNPDTL-20100504AMJ			--- No Interference ---		
16	KAJL-LD	Fayetteville, AR	BLDTL-20130724ACZ			--- No Interference ---		
16	K16IS-D	Pittsburg, KS	BNPDTL-20100106AGF			--- No Interference ---		
22	K22HS-D	Eureka Springs, AR	BDISTTL-20070322ABE			--- No Interference ---		