

**GREG BEST  
CONSULTING, INC.**

9223 N. Manning Ave.  
Kansas City, MO 64157  
816-792-2913

March 19, 2009

**ENGINEERING STATEMENT**

The licensee of K268AR, is experiencing some substantial interference from the newly licensed KOCK radio station. Translator K268AR rebroadcasts the programming of KEPC. Both facilities are operated by Pikes Peak Community College, located in Colorado Springs, CO. The proposed instant application seeks to change the transmission facilities of K268AR to operation on channel 228 to prevent the translator from not being able to serve its audience and ceasing operation.

An extensive engineering analysis indicates that no channel consistent with FCC Rule 74.1204 is available. The channel list associated with +/-3 channels from the existing channel of operation, as well as channels exhibiting the IF spacing all have contour overlap conflicts and/or will create interference to other stations that will prevent operation. Maps showing the particular conflicts arising from the given channels are shown below.

Current Operating Channel = 268.

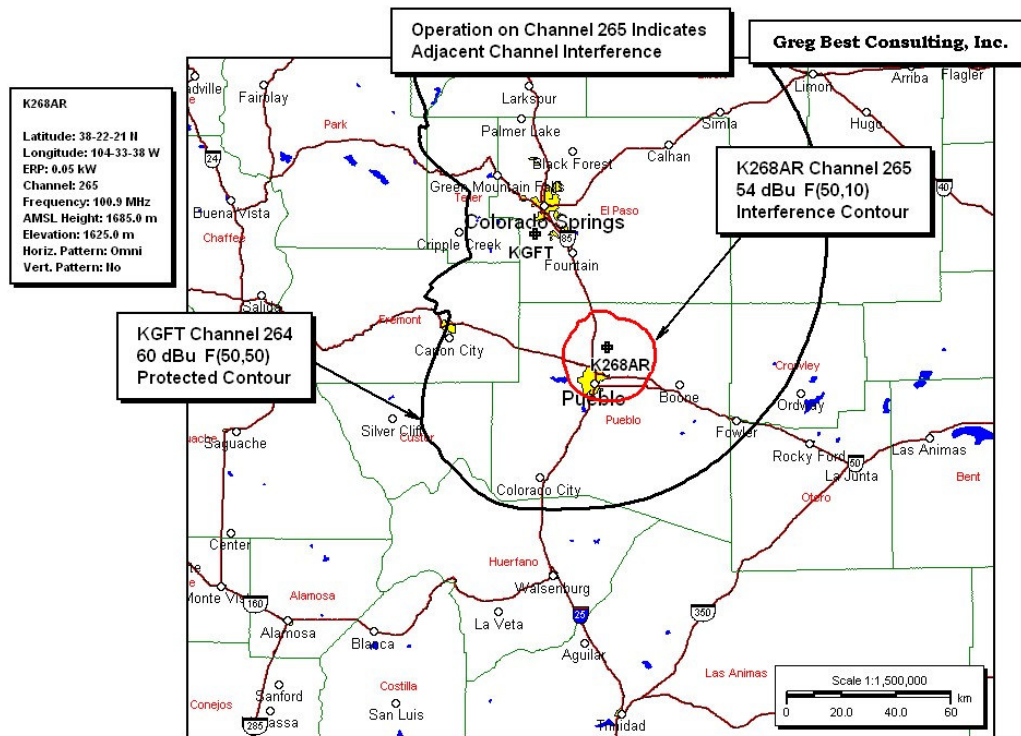
Possible operating channels 265, 266, 267, 269, 270, 271, 214, 215 according to FCC 74.1204.

FCC rule 73.207 was used to create a culling list of potentially impacted authorizations and applications for each of the above channels assuming that translators and LPFM authorizations and applications were treated as Class A facilities.

**INTERFERENCE MAPS**

The following maps show contour overlap conflicts when operation is proposed on the channels that are allowed by FCC rules and the subsequent text defines the population within the contour overlap regions. Contour overlap may exist with more than one authorization but only one has been shown for ease of communication of the situation.

The following map shows contour overlap conflicts when operation is proposed on channel 265.



K268AR / KGFT

This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 54.00 dBu

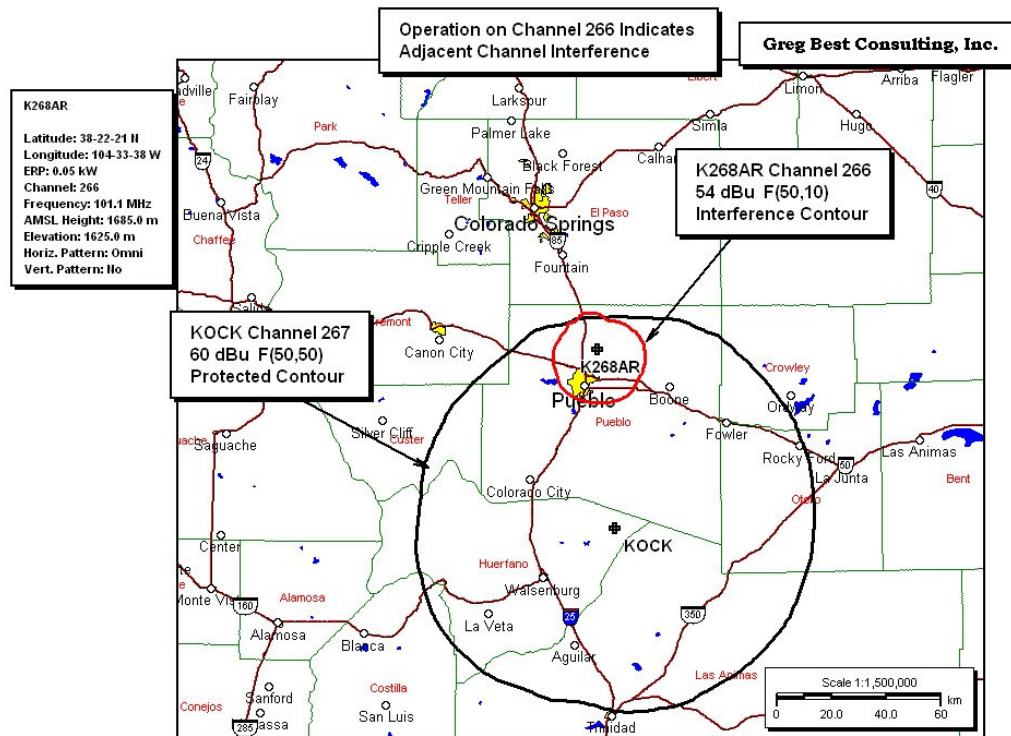
KGFT: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 118,244

Total Area Within Overlap Region: 844.17 sq. km

The following map shows contour overlap conflicts when operation is proposed on channel 266.



K268AR / KOCK

This overlap region consists of the intersection of the following contours:

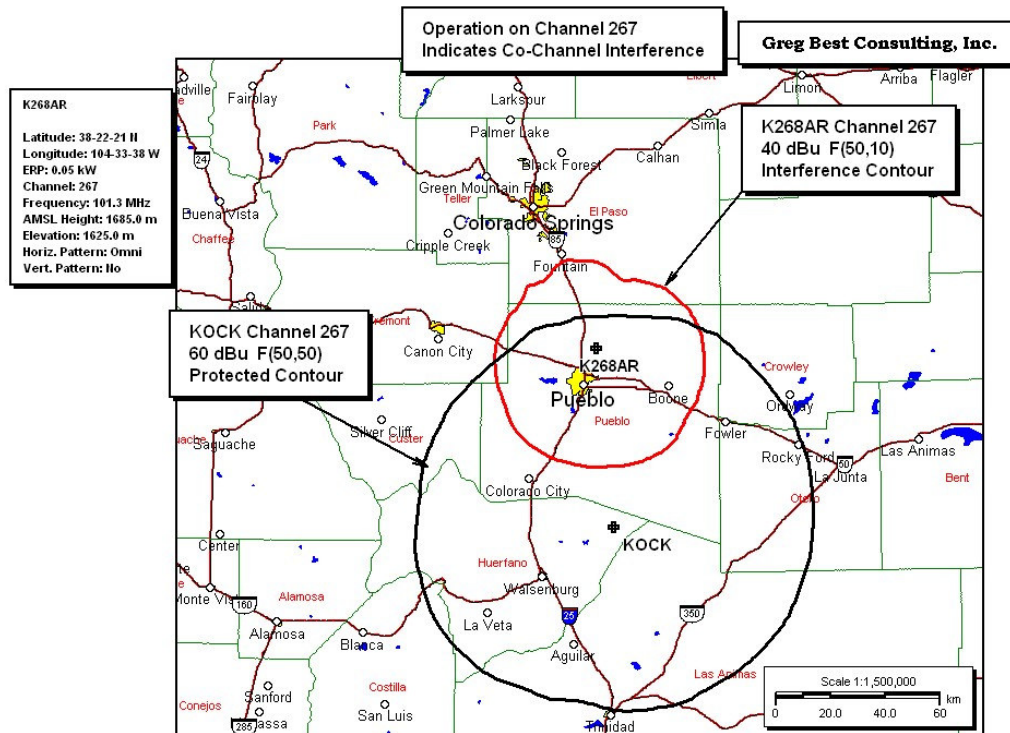
K268AR: FCC F(50-10) 54.00 dBu  
 KOCK: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 118,244

Total Area Within Overlap Region: 844.17 sq. km

The following map shows contour overlap conflicts when operation is proposed on channel 267.



K268AR / KOCK

This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 40.00 dBu

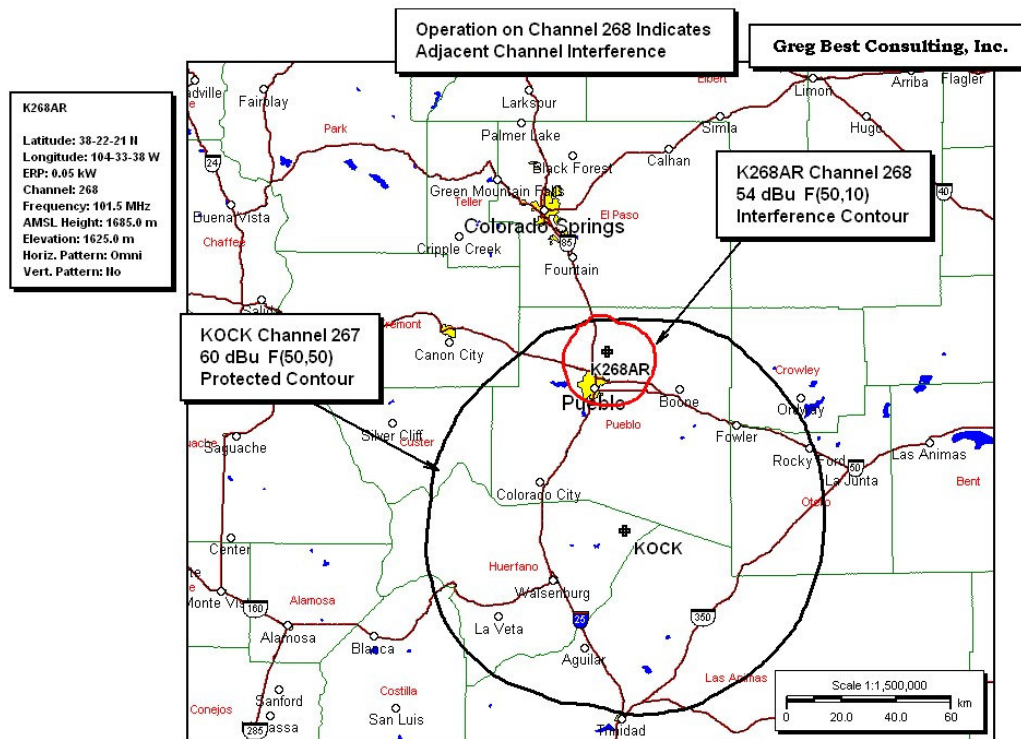
KOCK: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 136,126

Total Area Within Overlap Region: 3361.10 sq. km

K268AR currently operates on channel 268 and interference is shown and is documented to exist.



K268AR / KOCK

This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 54.00 dBu

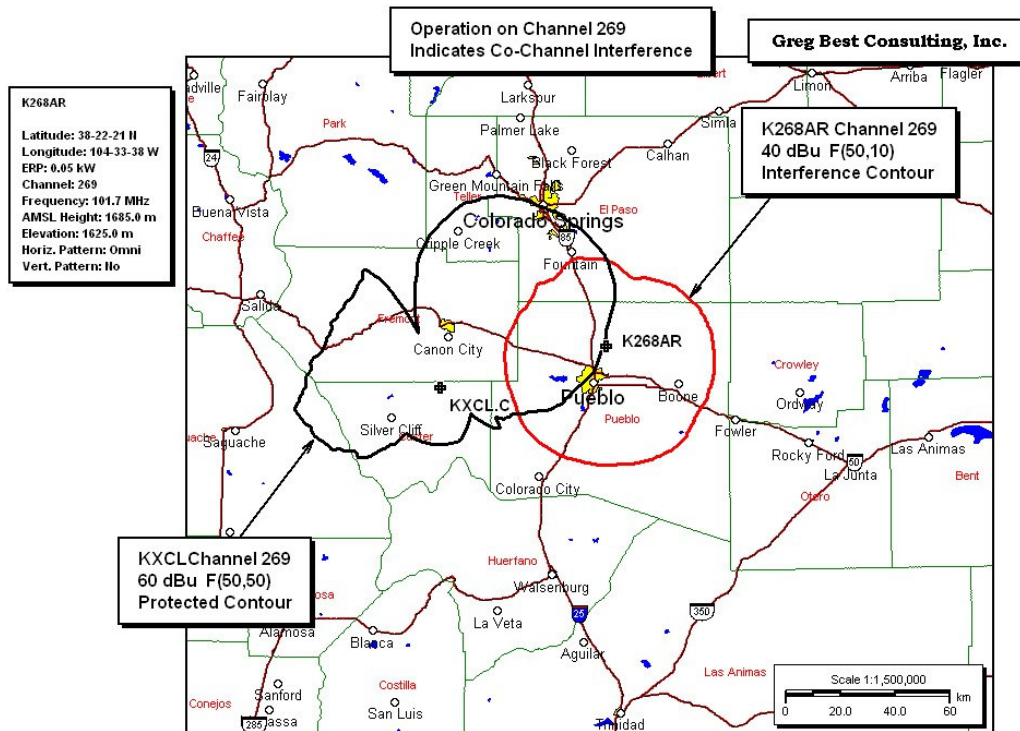
KOCK: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 118,244

Total Area Within Overlap Region: 844.17 sq. km

The following map shows contour overlap conflicts when operation is proposed on channel 269.



K268AR / KXCL.C

This overlap region consists of the intersection of the following contours:

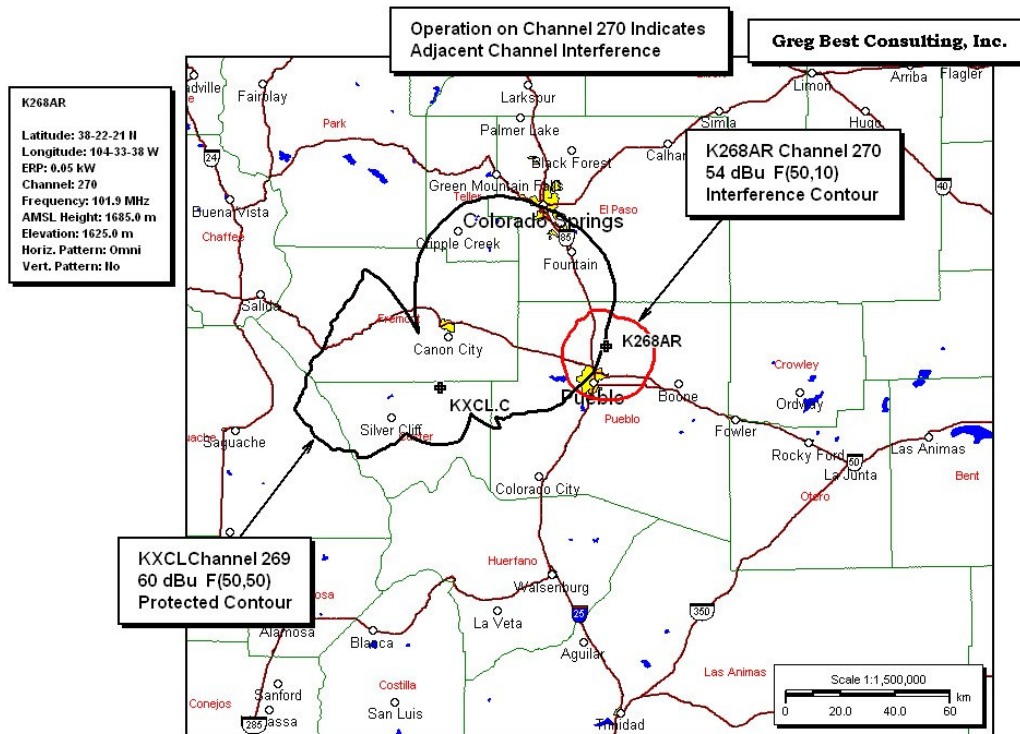
K268AR: FCC F(50-10) 40.00 dBu  
KXCL.C: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: **39,096**

Total Area Within Overlap Region: 1557.24 sq. km

The following map shows contour overlap conflicts when operation is proposed on channel 270.



K268AR / KXCL.C

This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 54.00 dBu  
 KXCL.C: FCC F(50-50) 60.00 dBu

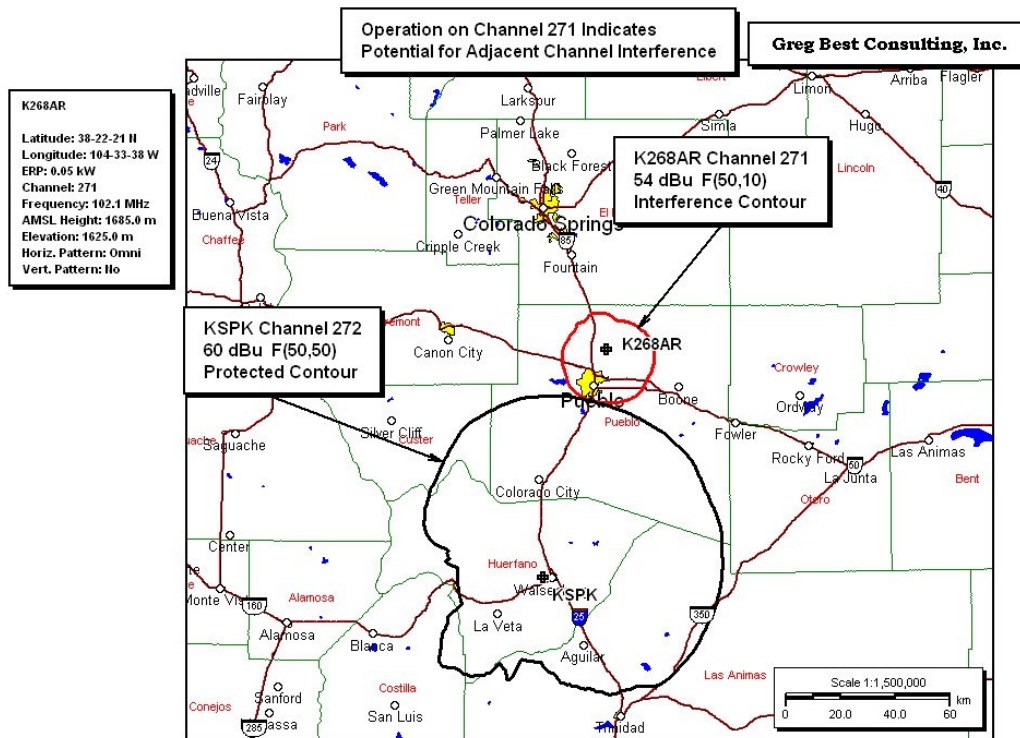
Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 27,740

Total Area Within Overlap Region: 313.28 sq. km



The following map shows contour overlap conflicts when operation is proposed on channel 271.



K268AR / KSPK

This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 54.00 dBu  
KSPK: FCC F(50-50) 60.00 dBu

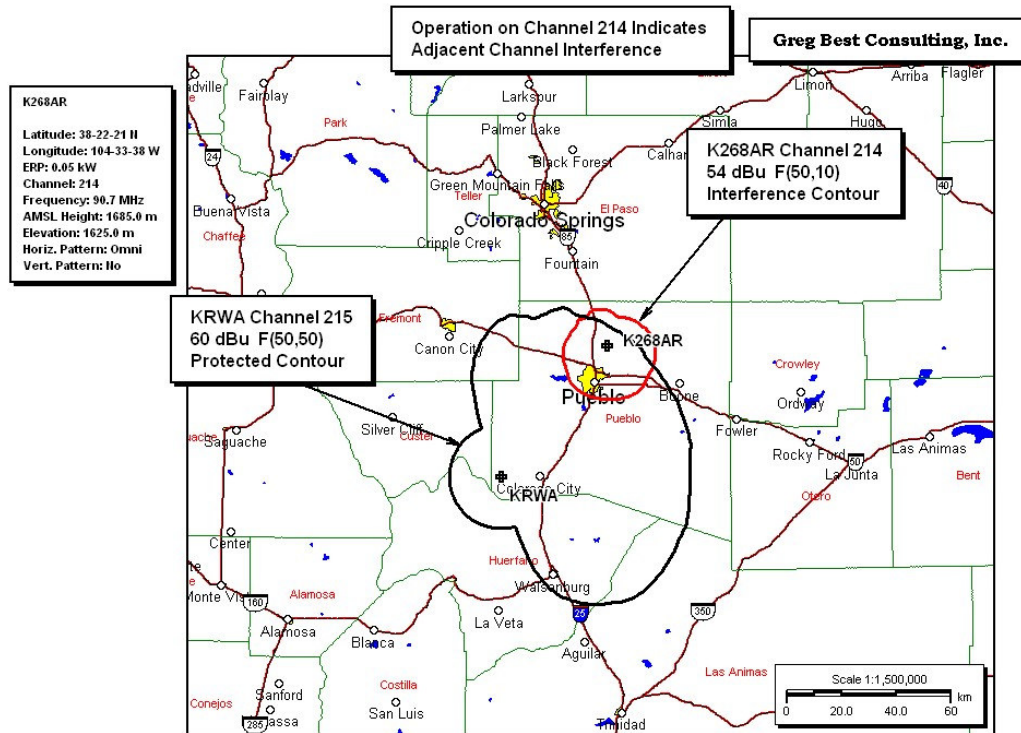
Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 0  
Total Area Within Overlap Region: 0.00 sq. km

While there is technically no contour overlap, the contours are tangent and there is good likelihood for interference to occur. The primary service area of K268AR is Pueblo, CO and KSPK has demonstrated very good signal strengths resulting in good reception all through Pueblo. Thus the presence of K268AR on channel 271 would result in interference to and from KSPK.



The following map shows contour overlap conflicts when operation is proposed on channel 214.



K268AR / KRWA

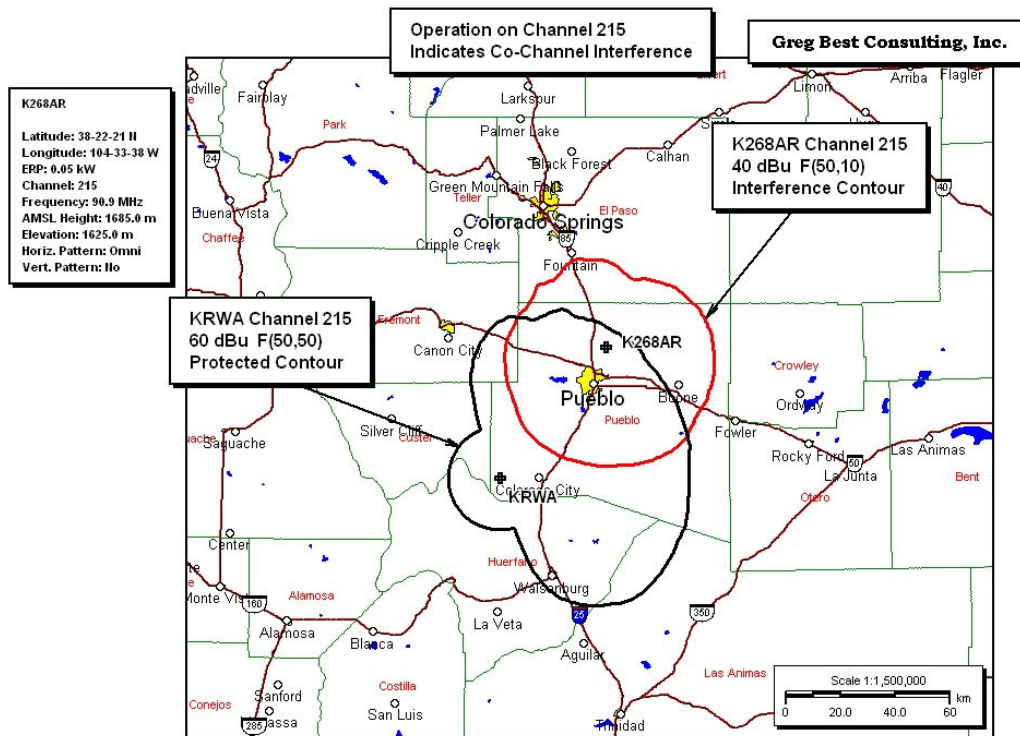
This overlap region consists of the intersection of the following contours:

K268AR: FCC F(50-10) 54.00 dBu  
 KRWA: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 118,194  
 Total Area Within Overlap Region: 687.87 sq. km

The following map shows contour overlap conflicts when operation is proposed on channel 215.



K268AR / KRWA

This overlap region consists of the intersection of the following contours:

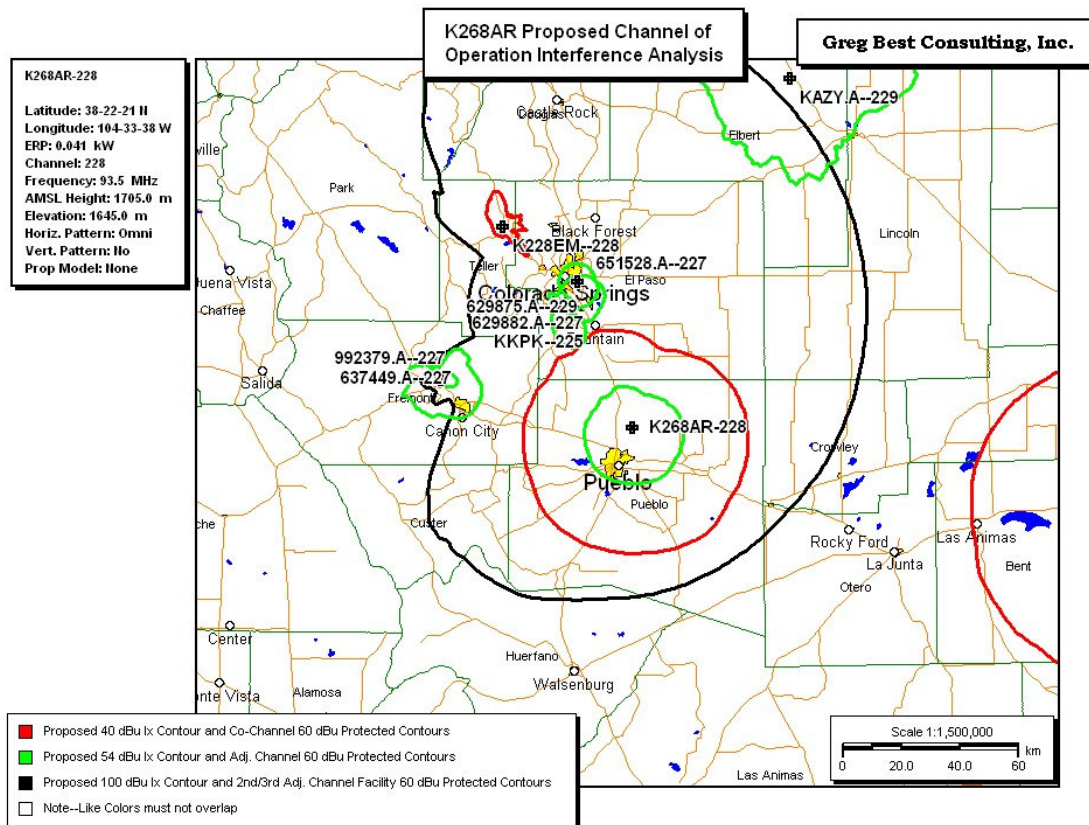
K268AR: FCC F(50-10) 40.00 dBu  
 KRWA: FCC F(50-50) 60.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 135,339

Total Area Within Overlap Region: 2683.80 sq. km

The following map shows the proposed channel 228 and ERP with regard to potential interference to authorizations and applications. FCC rule 73.207 was once again used to search potential authorizations that might receive or cause interference. Even though KKPK's protected contour completely envelopes the K268AR location, there is no interference. The second and third adjacent interference contour, 100 dBu F(50,10), for K268AR is so small it cannot be seen due to the crosshair identifying the translator location. Because the contour is so small there is no population contained within the contour and thus no interference occurs.



No evidence of any possible interference is predicted with this scenario even with K268AR operating at the maximum allowed ERP adjusted for its HAAT.

Therefore, the licensee of K268AR respectfully submits this exhibit as part of the application for a request that is in the public interest and is deserving of a waiver.

Respectfully submitted,

*Gregory L. Best, PE*