

SECTION 74.1204 OVERLAP STUDY

THE INSTANT TRANSLATOR APPLICATION EASILY COMPLIES WITH THE OVERLAP REQUIREMENTS STIPULATED IN SECTION 74.1204 TOWARDS ALL CO-CHANNEL STATIONS. THE FCC (50,10) 40 DBU INTERFERENCE CONTOUR DOES NOT APPROACH THE PROTECTED 60 DBU CONTOUR OF ANY CURRENTLY AUTHORIZED FACILITIES, ALLOTMENTS, CONSTRUCTION PERMITS, OR APPLICATIONS.

THIS APPLICATION ALSO COMPLIES WITH THE OVERLAP REQUIREMENTS STIPULATED IN SECTION 74.1204 TOWARDS ALL FIRST ADJACENT STATIONS. THE FCC (50,10) 54 DBU INTERFERENCE CONTOUR DOES NOT OVERLAP THE PROTECTED 60 DBU CONTOUR OF ANY CURRENTLY AUTHORIZED FACILITIES, ALLOTMENTS, CONSTRUCTION PERMITS OR APPLICATIONS. APPENDIX A DEMONSTRATES COMPLIANCE TOWARDS 1ST ADJACENT STATIONS.

THIS APPLICATION ALSO COMPLIES WITH THE OVERLAP REQUIREMENTS TOWARDS ALL SECOND AND THIRD ADJACENT STATIONS EXCEPT FOR KGNT 280A SMITHFIELD, UTAH, AND KBNZ 285C TREMONTON, UTAH. OTHER THAN THOSE OF KGNT AND KBNZ, THE FCC (50,10) 100 DBU INTERFERENCE CONTOUR DOES NOT OVERLAP THE PROTECTED 60 DBU CONTOUR OF ANY CURRENTLY AUTHORIZED FACILITIES, ALLOTMENTS, CONSTRUCTION PERMITS OR APPLICATIONS. APPENDIX B DEMONSTRATES COMPLIANCE TOWARDS ALL 2ND AND 3RD ADJACENT STATIONS WITH THE EXCEPTIONS OF KGNT AND KBNZ.

KBNZ IS THE PRIMARY STATION FOR THE PROPOSED TRANSLATOR. SINCE THE TRANSLATOR'S 100 DBU INTERFERENCE CONTOUR DOES NOT APPROACH THE KBNZ CITY OF LICENSE OF TREMONTON, SECTION 74.1204 (B)(4)(E) ALLOWS THE PROPOSED TRANSLATOR TO BE EXEMPT FROM THE OVERLAP REQUIREMENTS OF SECTION 74.1204.

HOWEVER, THIS EXEMPTION DOES NOT EXCUSE THE PROPOSED TRANSLATOR FROM THE OVERLAP REQUIREMENTS OF SECTION 74.1204 WITH RESPECT TO KGNT. THEREFORE, THE APPLICANT RESPECTFULLY REQUESTS A WAIVER TOWARDS KGNT WHICH WILL BE FOUND LATER IN THIS STUDY.

FINALLY, THE PROPOSED TRANSLATOR COMPLIES WITH THE I.F. SEPARATION REQUIREMENTS STIPULATED IN SECTIONS 74.1204 AND 73.207 TOWARDS ALL STATIONS 53 OR 54 CHANNELS REMOVED FROM ITS OWN CHANNEL. FOR PURPOSES OF THIS I.F. STUDY, TRANSLATORS WERE TREATED AS CLASS "A" FULL SERVICE STATIONS. IT SHOULD BE NOTED THAT A SEPARATE TRANSLATOR APPLICATION ON CHANNEL 230D AT SMITHFIELD, UTAH WAS FILED BY ANOTHER PARTY IN AUCTION 83. HOWEVER, THE 230D TRANSLATOR APPLICATION ONLY SPECIFIED AN ERP OF 10 WATTS. SECTION 74.1204 (B)(4)(G) ALLOWS A TRANSLATOR OPERATING WITH LESS THAN 100 WATTS ERP TO BE TREATED AS A CLASS D STATION AND, THEREFORE, IS NOT SUBJECT TO THE INTERMEDIATE FREQUENCY SEPARATION REQUIREMENTS. IN THIS CASE, THE 230D TRANSLATOR APPLICATION ONLY SPECIFIED AN ERP OF 10 WATTS. THEREFORE, IT WILL BE TREATED AS A CLASS D STATION AND WILL BE EXEMPT FROM I.F. SEPARATION REQUIREMENTS.

REQUEST FOR WAIVER TO 3RD ADJACENT STATION

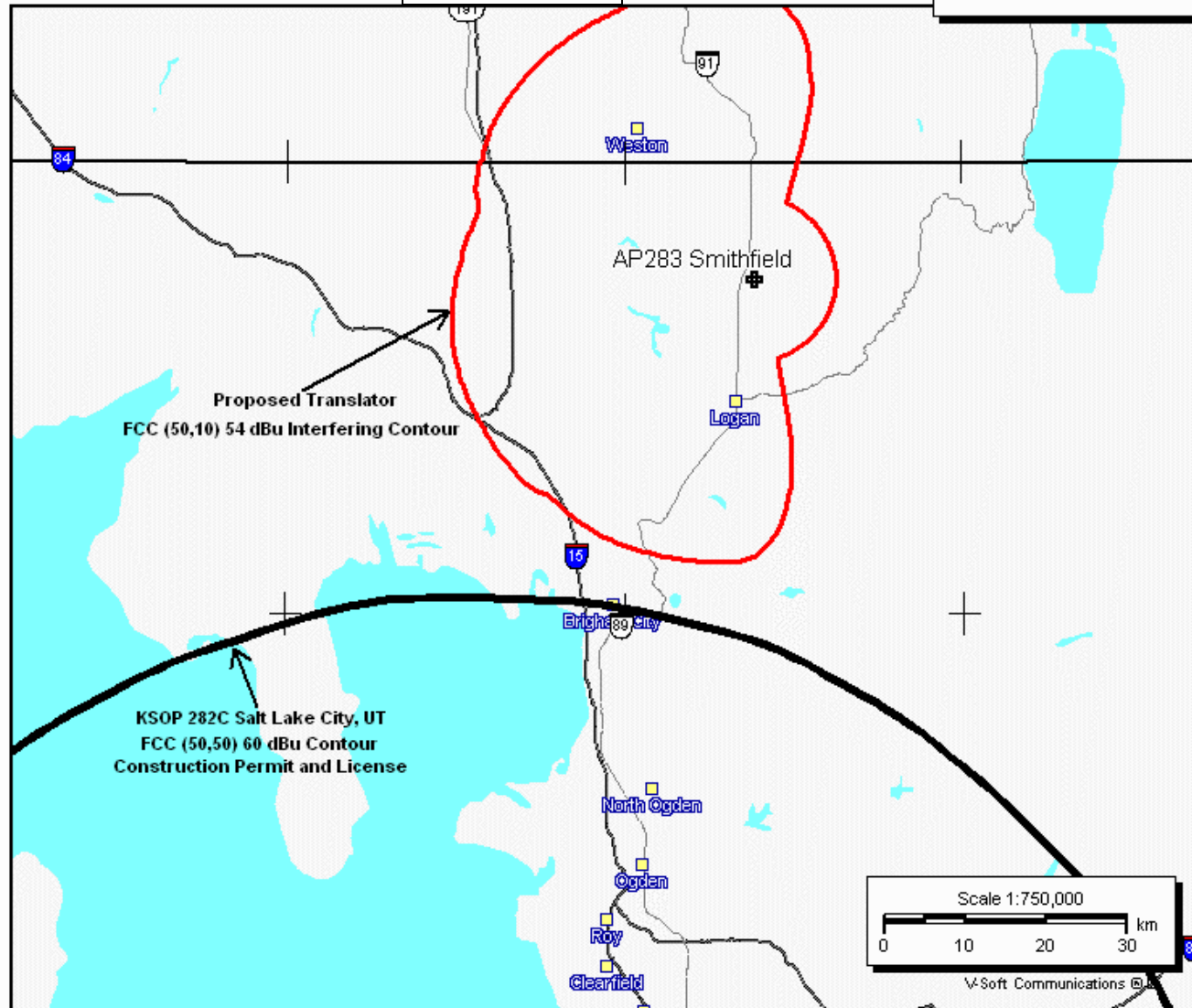
THE PROPOSED TRANSLATOR ON CHANNEL 283D WILL BE ON THE 3RD ADJACENT CHANNEL TO KGNT ON 280A. ALTHOUGH THE 100 DBU INTERFERING CONTOUR OF THE PROPOSED TRANSLATOR IS FULLY ENCOMPASSED BY THE PROTECTED 60 DBU CONTOUR OF KGNT, THE APPLICANT REQUESTS A WAIVER TO SECTION 74.1204(a)(3) BECAUSE OF THE FOLLOWING REASONS:

THERE IS NO POPULATION WITHIN THE PROPOSED TRANSLATOR'S 100 DBU INTERFERING CONTOUR. THE TRANSLATOR'S 100 DBU INTERFERING CONTOUR, AT ITS MOST DISTANT POINT FROM THE TRANSLATOR ANTENNA, IS ONLY 1.11 KILOMETERS. THE TRANSMITTER IS LOCATED ON A REMOTE MOUNTAIN TOP, FAR MORE THAN 1.11 KILOMETERS FROM THE NEAREST HIGHWAY, DWELLING, OR BUSINESS. ALSO, THE ONLY ROADS WITHIN THE 100 DBU INTERFERING CONTOUR ARE ROADS THAT ACCESS THE TRANSMITTER SITE. THEREFORE NO POPULATION RESIDES WITHIN OR REGULARLY TRAVELS THROUGH THE EXTREMELY SMALL PREDICTED 100 DBU CONTOUR. SEE APPENDIX C FOR A MAP OF THE 100 DBU CONTOUR. FINALLY, THE TRANSMITTER SITE FOR KGNT IS LOCATED ONLY 6.75 KILOMETERS FROM THE PROPOSED TRANSLATOR'S ANTENNA SITE. THEREFORE, THE TWO STATIONS CAN BE CONSIDERED CO-LOCATED AND ONE CAN SAFELY ASSUME THAT THE TRANSLATOR WILL NOT INTERFERE WITH KGNT IN ANY WAY.

APPENDIX A

Translator Contour Study

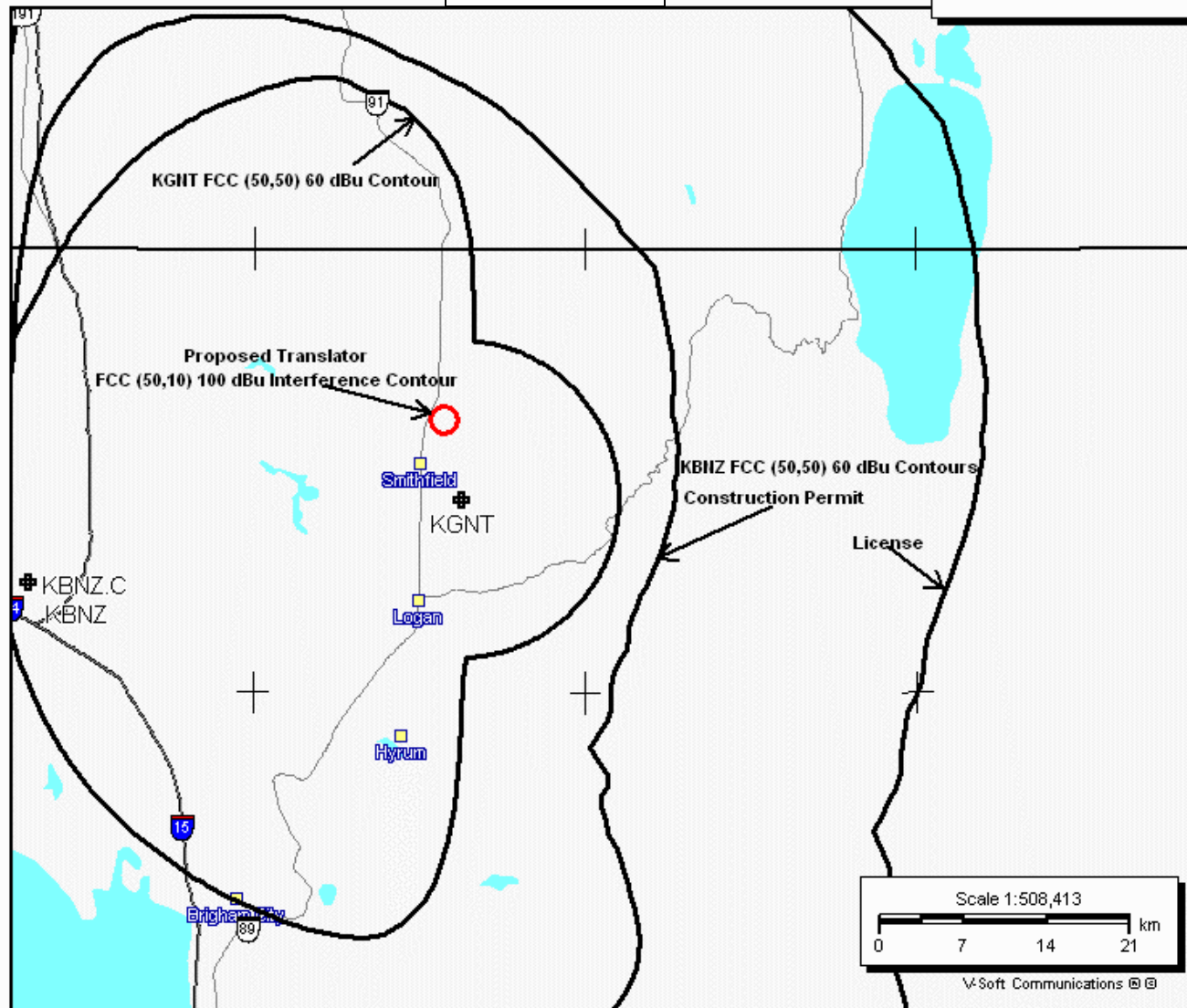
AP283 Smithfield
 BNPFT20030317MNU
 Latitude: 41-52-18 N
 Longitude: 111-48-31 W
 ERP: 0.25 kW
 Channel: 283
 Frequency: 104.5 MHz
 AMSL Height: 1728.0 m
 Elevation: 1716.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: FCC



APPENDIX B

Translator Contour Study

AP283 Smithfield
 BNPFT20030317MNU
 Latitude: 41-52-18 N
 Longitude: 111-48-31 W
 ERP: 0.25 kW
 Channel: 283
 Frequency: 104.5 MHz
 AMSL Height: 1728.0 m
 Elevation: 1716.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: FCC



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APPENDIX C

Translator Contour Study

AP283 Smithfield

BNPFT20030317MNU
Latitude: 41-52-18 N
Longitude: 111-48-31 W
ERP: 0.25 kW
Channel: 283
Frequency: 104.5 MHz
AMSL Height: 1728.0 m
Elevation: 1716.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC

