

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NEW TIMES CULTURE AND EDUCATION CENTER in support of its Application for Construction Permit to operate a Low Power FM station on Channel 270 (101.9) in Atlanta, Georgia.

It is proposed to mount a standard two-bay circularly polarized antenna at the 14-meter level of an existing building. The proposed effective radiated power is 100 watts. Exhibit B is a map upon which the proposed 60 dBu service contour for the proposed facility is plotted. It is important to note that the proposed location meets all of the Commission's spacing requirements to pertinent co-channel and adjacent-channel full-power, FM translator and LPFM stations, except in two instances. The proposed site is short-spaced to second-adjacent-channel stations WKHX-FM in Marietta, Georgia and a new application (BPFT-20030317DYG) in Atlanta, Georgia. As a result, we request a waiver of the Commission's Rules with respect to WKHX-FM and the new application and the justification appears in Exhibit C. We have also determined that the proposed facility should not cause objectionable interference to the input signal of any existing translator station, based on the information contained in the FCC's CDBS database.

Employing the methods of OET Bulletin No. 65, and based on the elevation pattern of a standard 2-bay FM antenna, maximum power density two meters above ground of 0.011 mW/cm^2 is calculated to occur 6 meters from the base of the building. Since this is only 5.5 percent of the 0.2 mW/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating in the FM band, a grant of this proposal can be considered a

EXHIBIT A

minor environmental action with respect to human exposure to non-ionizing electromagnetic radiation. Further the station owner will take whatever precautionary steps are necessary to ensure that workers operating in the vicinity of the antenna are not exposed to RF energy in excess of the Commission's guideline values.

Due to the diminutive height of the existing building and its proximity to the nearest airport runways, the FAA has not been notified of this application. In addition, FCC registration of this structure is not required for the same reasons. This conclusion is supported by the Commission's TOWAIR program.

I declare under penalty of perjury that the foregoing statements and the attached exhibit, which was prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KYLE T. FISHER

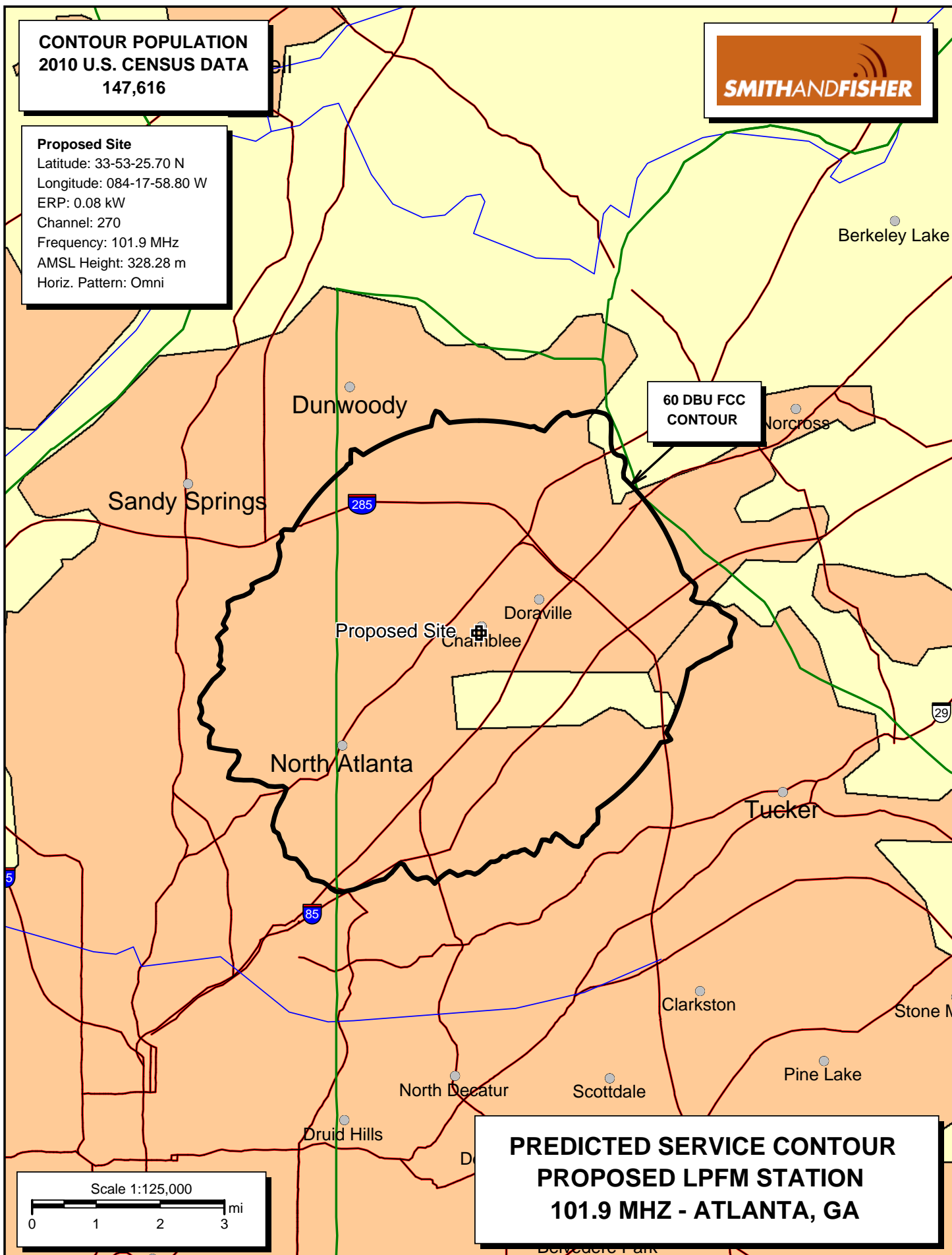
November 13, 2013

CONTOUR POPULATION
2010 U.S. CENSUS DATA
147,616

SMITHANDFISHER

Proposed Site

Latitude: 33-53-25.70 N
Longitude: 084-17-58.80 W
ERP: 0.08 kW
Channel: 270
Frequency: 101.9 MHz
AMSL Height: 328.28 m
Horiz. Pattern: Omni



**60 DBU FCC
CONTOUR**

PREDICTED SERVICE CONTOUR
PROPOSED LPFM STATION
101.9 MHZ - ATLANTA, GA

REQUEST FOR WAIVER OF SECOND-ADJACENT-CHANNEL SPACING RULE
PROPOSED LPFM STATION
CHANNEL 270 – ATLANTA, GEORGIA

The site proposed herein is located 9.9 kilometers from that of WKHX-FM, which operates on Channel 268C0 in Marietta, Georgia, and 17.2 kilometers from the site of a proposed translator on Channel 268 in Atlanta, Georgia (BPFT-20030317DYG). Since the required spacing to each of these stations is 84 and 21 kilometers, respectively, a waiver of the Commission's spacing rules with regard to these stations is requested and believed to be justified for the reasons stated below.

In Exhibit C-2, we have plotted the proposed LPFM site. As shown, the 101 dBu contour of WKHX-FM passes close to the proposed site. Based on the 40 dB desired-to-undesired ratio applied to second-adjacent-channel situations such as this, we have also plotted the proposed LPFM 141 dBu interference contour, which extends only 10 meters from the antenna. Since the antenna will be mounted 14.7 meters above ground, the proposed LPFM facility will not cause any adverse effect on the reception of WKHX-FM.

In Exhibit C-3, we have plotted the protected 60 dBu contour of the proposed translator in relation to the proposed 100 dBu interference contour of the instant facility. As shown, there is no overlap between the protected contour of the translator and the interference contour of the proposed LPFM station.

Finally, we have conducted a Longley-Rice-based interference analysis for WKHX-FM, the results of which are attached as Exhibit C-4. The study was run with a cell size of 1.0 kilometer and a 0.1- kilometer increment spacing. It calculates predicted interference (based on the 40 dBu desired-to-undesired ratio for second-adjacent-channel situations such as this) from the

EXHIBIT C-1

proposed LPFM station in locations where there is a signal of at least 60 dBu for WKHX-FM available. The study concludes that there is no population within the WKHX-FM protected contour that would be adversely affected by the operation of the proposed LPFM station.

Accordingly, a waiver of the Commission's Rules with regard to WKHX-FM and translator proposal BPFT-20030317DYG is requested and believed to be justified.

NOTE: PROPOSED INTERFERENCE CONTOUR EXTENDS ONLY 10 METERS FROM THE PROPOSED LPFM ANTENNA. SINCE ANTENNA WILL BE MOUNTED 14.7 METERS ABOVE GROUND, NO ADVERSE EFFECT TO RECEPTION OF WKHX-FM IS EXPECTED.



Sandy Springs

285

PROPOSED 141 DBU
FCC CONTOUR
(10 METERS)

Doraville

Proposed Site

WKHX-FM 101.0 DBU
FCC CONTOUR

North Atlanta

85

WKHX-FM

Clarkston

North Decatur

Scottdale

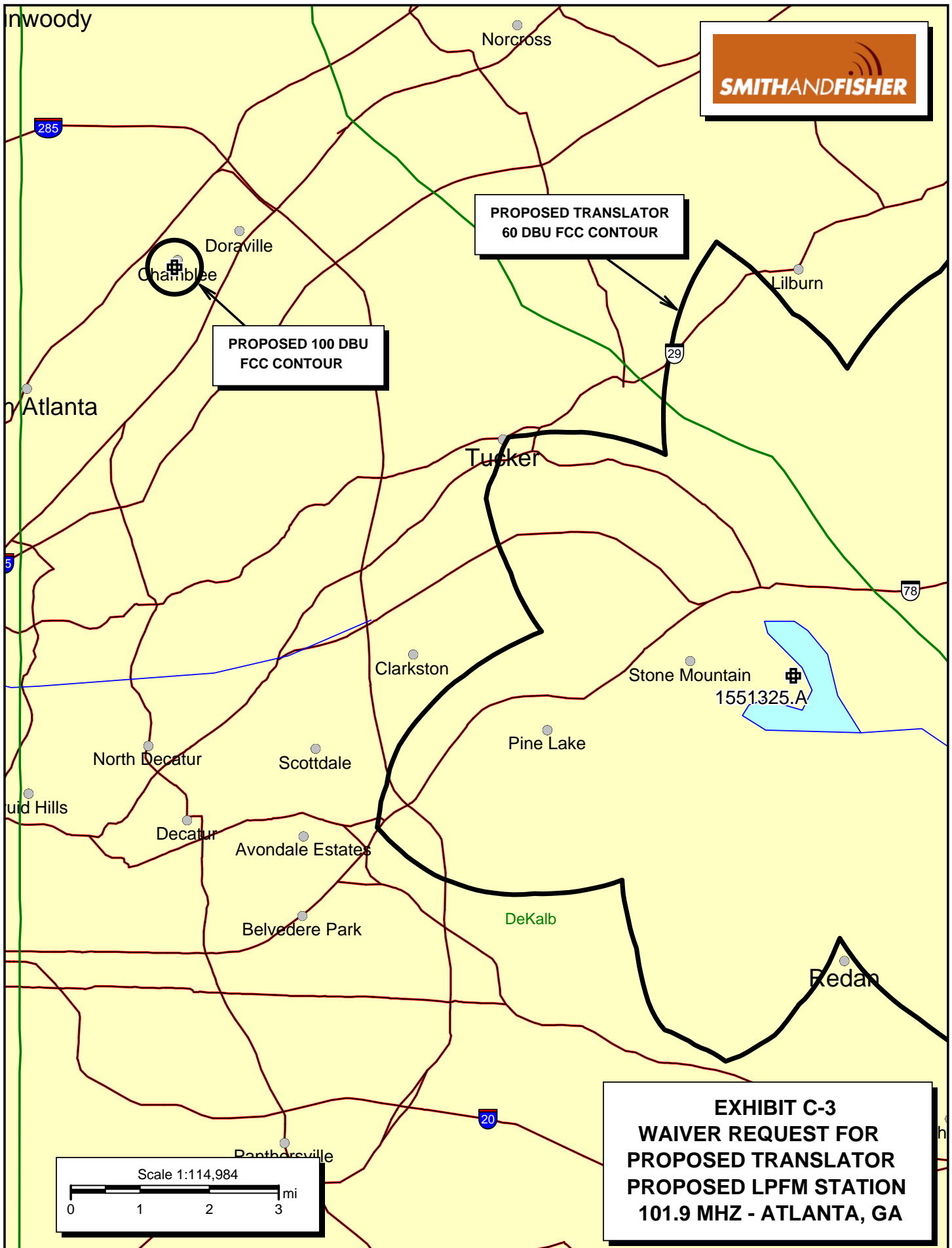
Druid Hills

De

Scale 1:83,160

0 1 2 3 mi

EXHIBIT C-2
WAIVER REQUEST FOR WKHX-FM
PROPOSED LPFM STATION
101.9 MHZ - ATLANTA, GA



*Smith and Fisher Population Report**WKHX-FM (268) Marietta, GA - BLH20050228ADF**Lat: 33-48-26 N Lng: 084-20-22 W ERP: 100.0 kW AMSL: 612.0 m**FM Interference Study**Protected: FCC F(50-50): 60 dBu**Interference considered within 100 km.**Signal Resolution: 1.0 km**Study Date: 11/13/2013**FM Database Date: 10/25/2013**D/U Ratios Used:**Co: 20.0 dB**First Adj: 6.0 dB**Second Adj: -40.0 dB**Third Adj: -40.0 dB**Threshold for reception: 60.0 dBu.**Primary Terrain: V-Soft 3 Second US Terrain**Secondary Terrain: V-Soft 3 Second Alaska Terrain**Population Database: 2010 US Census (PL)**Percentages calculated using a baseline population of 5,112,308.**Stations considered which do not cause interference:**Proposed Atlanta LPFM (270)**Totals for WKHX-FM (268)**Calculation Area Population: 5,282,292 (17322.8 sq. km)**Not Affected by Terrain Loss: 5,112,308 (16558.0 sq. km)**Interfered Population: 0 (1380.9 sq. km)**Interference Free: 5,112,308 (15177.1 sq. km)**Percent Interference: 0.00**Terrain Blocked Population: 169,984 (764.8 sq. km)*