

Exhibit 13 – Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATIONS CONSIDERATIONS**

prepared for  
**Legend Communications of Wyoming, LLC**  
K294BD(FX) Gillette, WY  
Facility ID 155774  
Ch. 294D 0.25 kW

Legend Communications of Wyoming, LLC (“*Legend*”), licensee of FM translator station K294BD (Ch. 294D Gillette, WY), herein seeks to relocate this translator station to the tower of co-owned KGWY(FM) in Gillette, WY while specifying a different antenna, antenna height, and maximum effective radiated power (“ERP”).

The proposed facility will operate with a non-directional, circularly-polarized ERP of 250 Watts from an existing tower structure<sup>1</sup>. The location of the proposed 60 dBμ coverage contour is shown in the map provided as **Exhibit 13 - Figure 1**. A study of nearby FM facilities on co-channel, adjacent-channel, and intermediate frequencies was conducted to identify which stations require further study to demonstrate compliance under §74.1204.

REFERENCE					DISPLAY DATES			
44	14	35.0	N.	CLASS = D	DATA	02-12-15		
105	32	19.0	W.	Current Spacings to 3rd Adj.	SEARCH	02-12-15		
----- Channel 294 - 106.7 MHz -----								
Call	Channel	Location		Azi	Dist	FCC	Margin	
-----								
KXXL	LIC	291C1 Moorcroft	WY	102.9	6.23	74.0	-67.8	
KSLT	LIC	296C Spearfish	SD	85.4	136.38	94.0	42.4	
KASS	LIC	295C Casper	WY	200.7	177.85	104.0	73.9	
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Pertinent contour locations for all stations listed above were determined to meet the contour overlap requirements of §74.1204. The contour locations of the proposed K294BD and second adjacent station KSLT-FM are provided in **Exhibit 13 - Figure 2**. Similarly, the contour locations of the proposed K294BD and first adjacent station KASS-FM are provided in **Exhibit 13 – Figure 3**. As shown, there is no prohibited contour overlap.

As shown below, protection of third-adjacent station KXXL-FM is achieved pursuant to §74.1204(d) by demonstrating that K294BD interfering contour does not reach populated areas. KXXL

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<sup>1</sup> See Antenna Structure Registration Number 1009813.

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Page 2 of 2

has an FCC contour-method field strength of at least 97.89 dB $\mu$  at the proposed translator site. Thus, based on the -40 dB desired-to-undesired ratio specified in §74.1204(a)(3), the appropriate third-adjacent interfering contour at this location is 137.89 dB $\mu$ . Using the proposed antenna vertical plane (elevation) pattern, predicted ground-level field strengths<sup>2</sup> were predicted and plotted in **Exhibit 13 - Figure 4**. As shown, a maximum field strength of 111.84 dB $\mu$  is predicted at the ground level location. Thus, considering the antenna height and elevation pattern, the 137.89 dB $\mu$  interfering contour does not reach the ground.

*Legend* proposes to operate K294BD as a fill-in translator for co-owned KIML (1270 kHz Gillette, WY). As shown in **Exhibit 13 – Figure 5**, locations of the proposed translator coverage contour is completely within the 2 mV/m KIML coverage contour and the 25 mile radius for KIML(AM), thus complying with §74.1201(j).

Because there is an extensive area of coverage contour overlap between the licensed and proposed K294BD facilities, the proposal qualifies as a minor change under §74.1233(a) of the Rules. The coverage contours of the licensed and proposed K294BD facilities are provided in **Exhibit 13 - Figure 6**.

The proposed site is located more than 500 km from both the Canadian and Mexican borders, well beyond the coordination distances with either country. The nearest FCC monitoring station is 690 km distant at Grand Island, NE. This distance exceeds by a great margin the threshold minimum distance specified in §73.1030 that would suggest consideration of the monitoring station.

There are no AM stations within 3.2 km of the proposed site of K294BD.

It is therefore believed that the proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

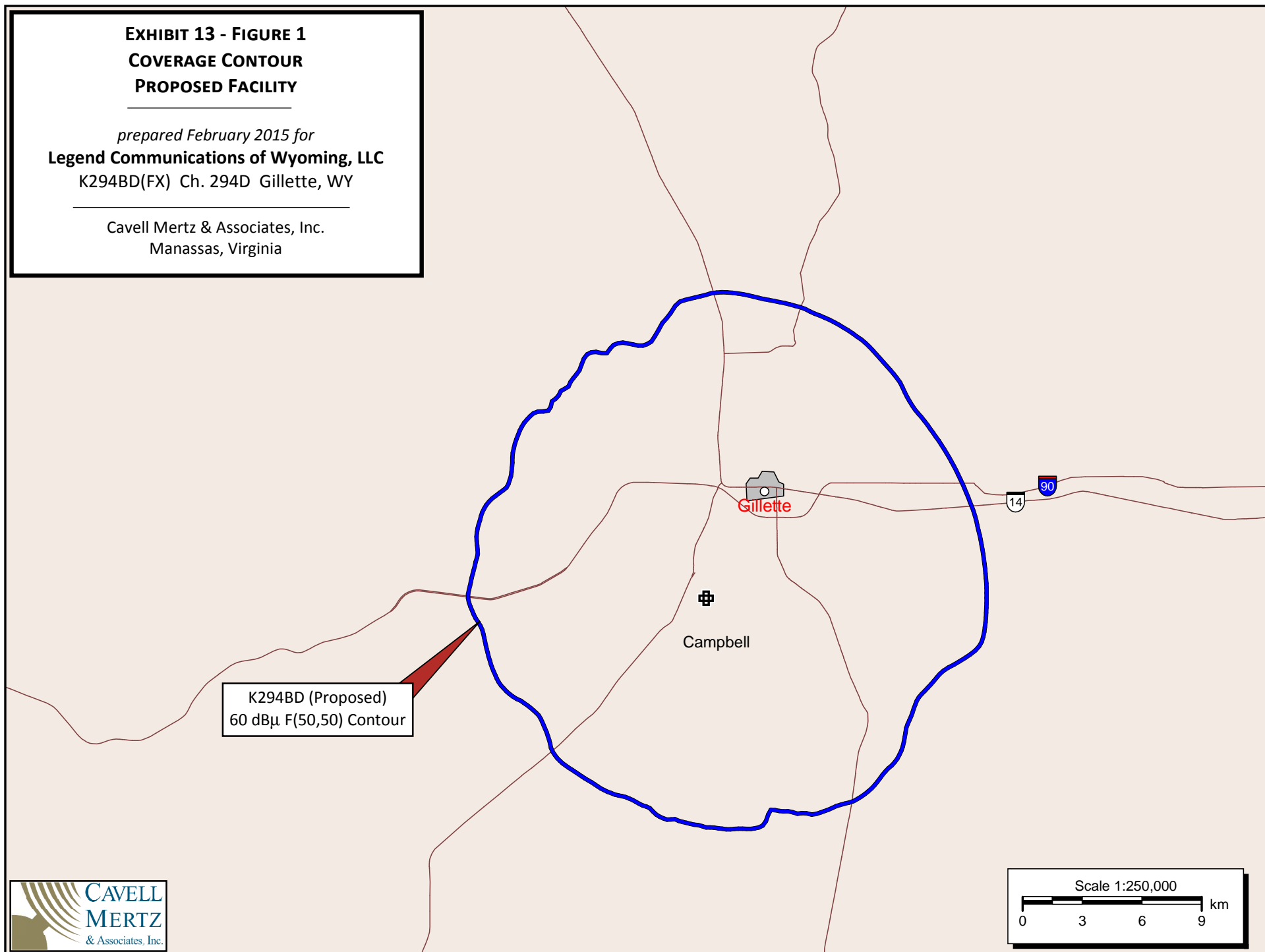
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<sup>2</sup> Free-space-loss predicted field strengths considered the antenna elevation pattern (*see Exhibit 13 - Figure 4*) and slant distances to head-height locations two meters above ground level.

**EXHIBIT 13 - FIGURE 1**  
**COVERAGE CONTOUR**  
**PROPOSED FACILITY**

*prepared February 2015 for*  
**Legend Communications of Wyoming, LLC**  
K294BD(FX) Ch. 294D Gillette, WY

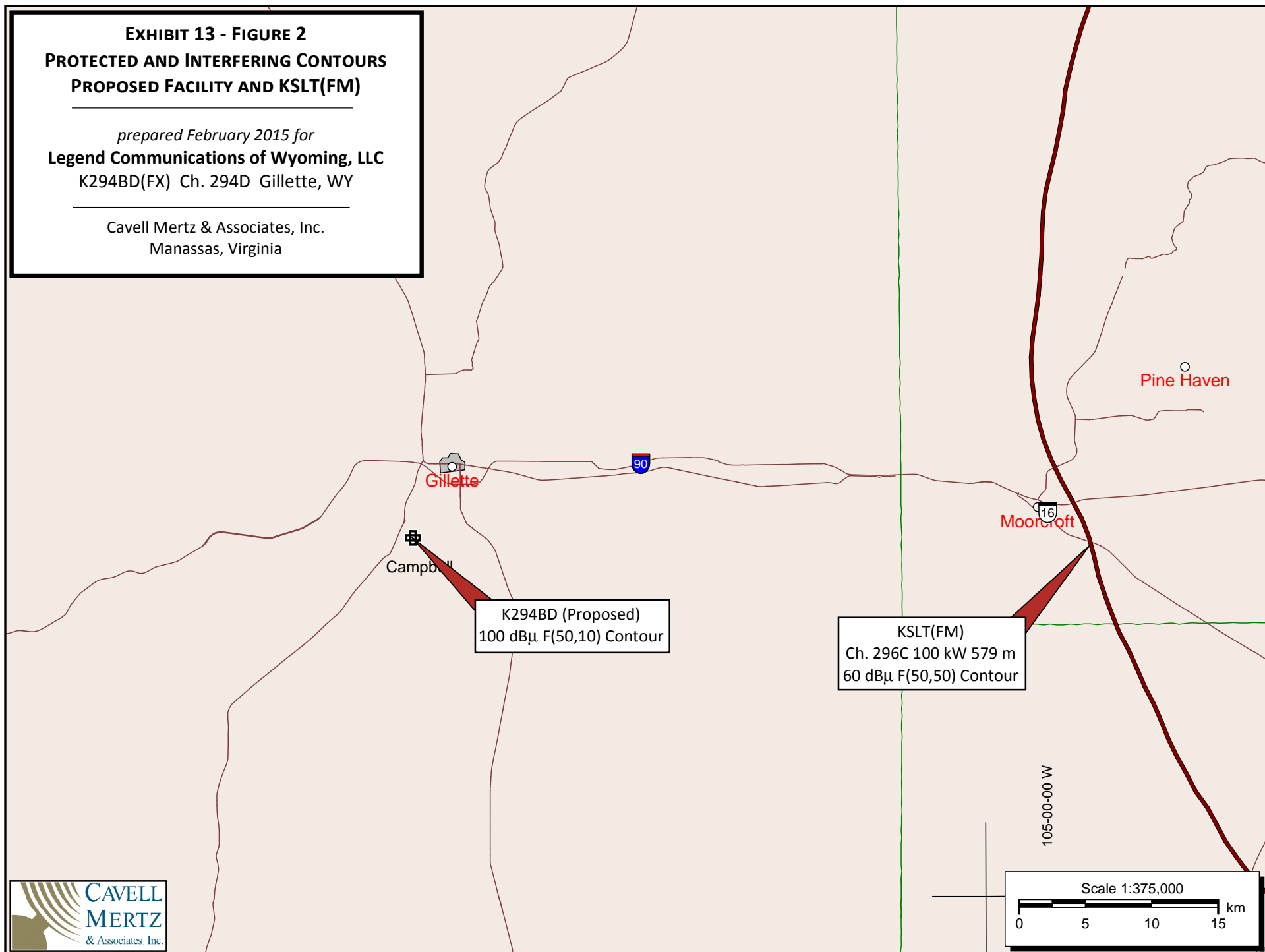
Cavell Mertz & Associates, Inc.  
Manassas, Virginia



**EXHIBIT 13 - FIGURE 2**  
**PROTECTED AND INTERFERING CONTOURS**  
**PROPOSED FACILITY AND KSLT(FM)**

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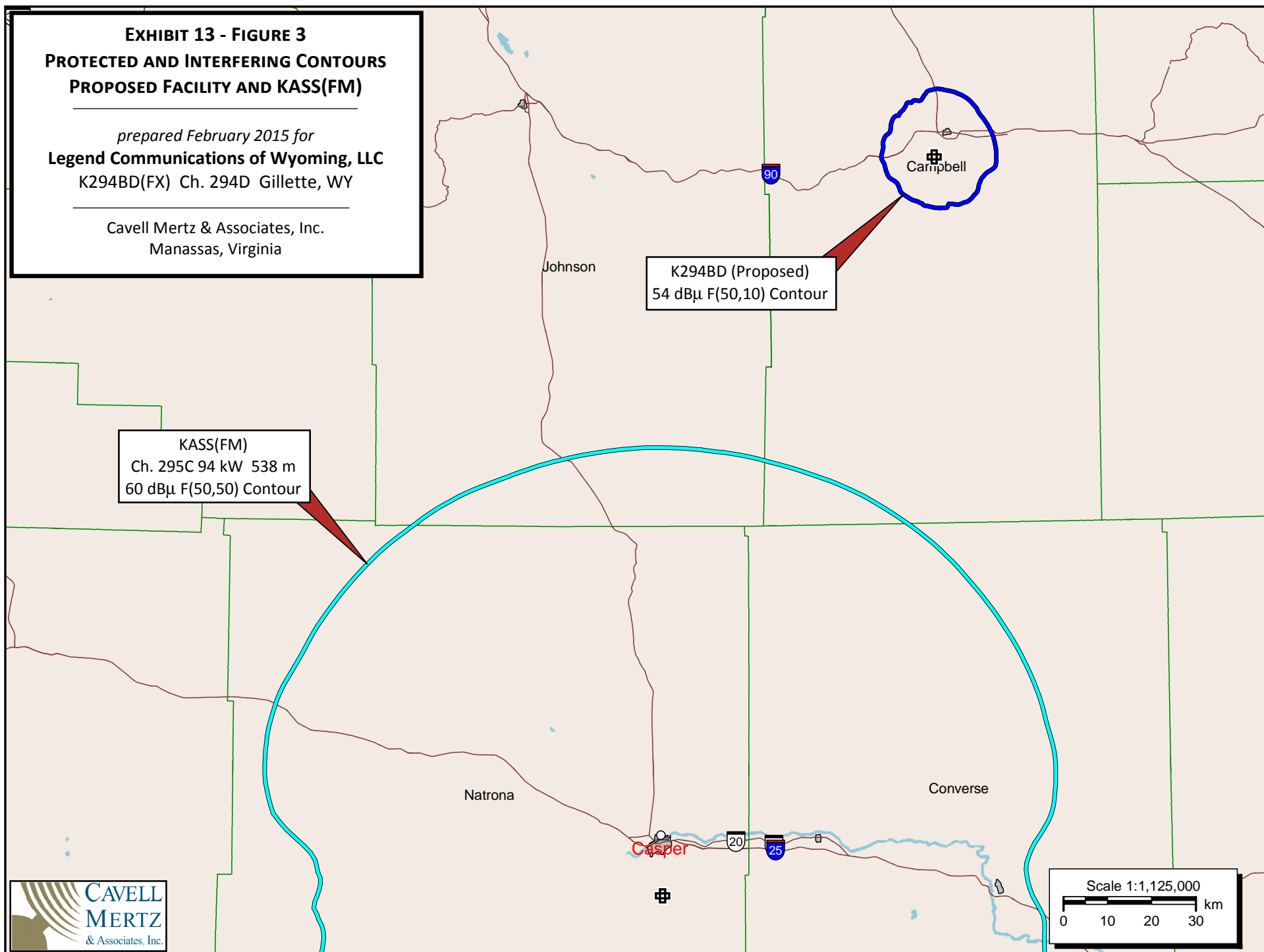
Cavell Mertz & Associates, Inc.  
Manassas, Virginia



**EXHIBIT 13 - FIGURE 3**  
**PROTECTED AND INTERFERING CONTOURS**  
**PROPOSED FACILITY AND KASS(FM)**

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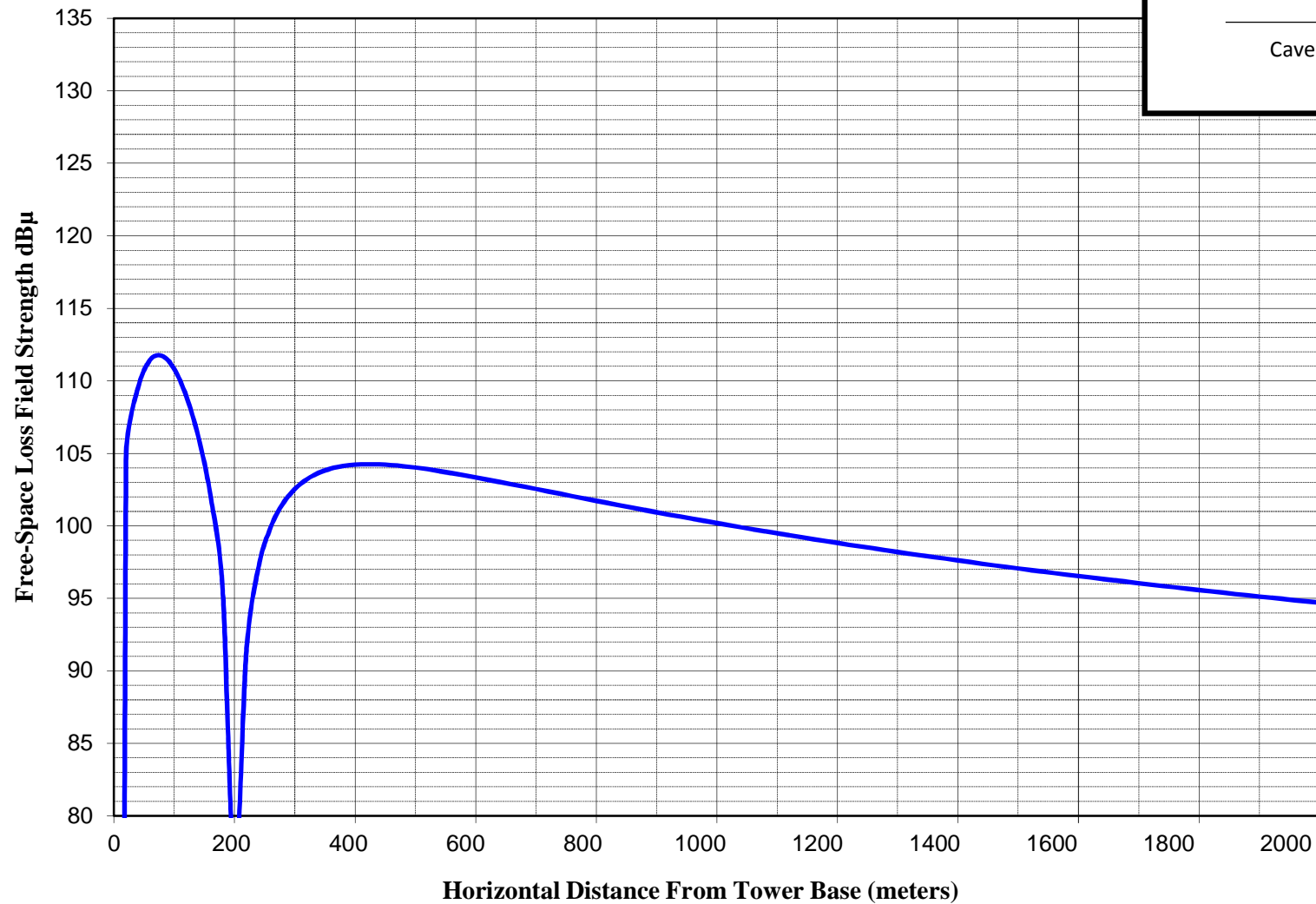
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**EXHIBIT 13 - FIGURE 4**  
**PREDICTED GROUND LEVEL**  
**FIELD STRENGTHS (2 METERS AGL)**

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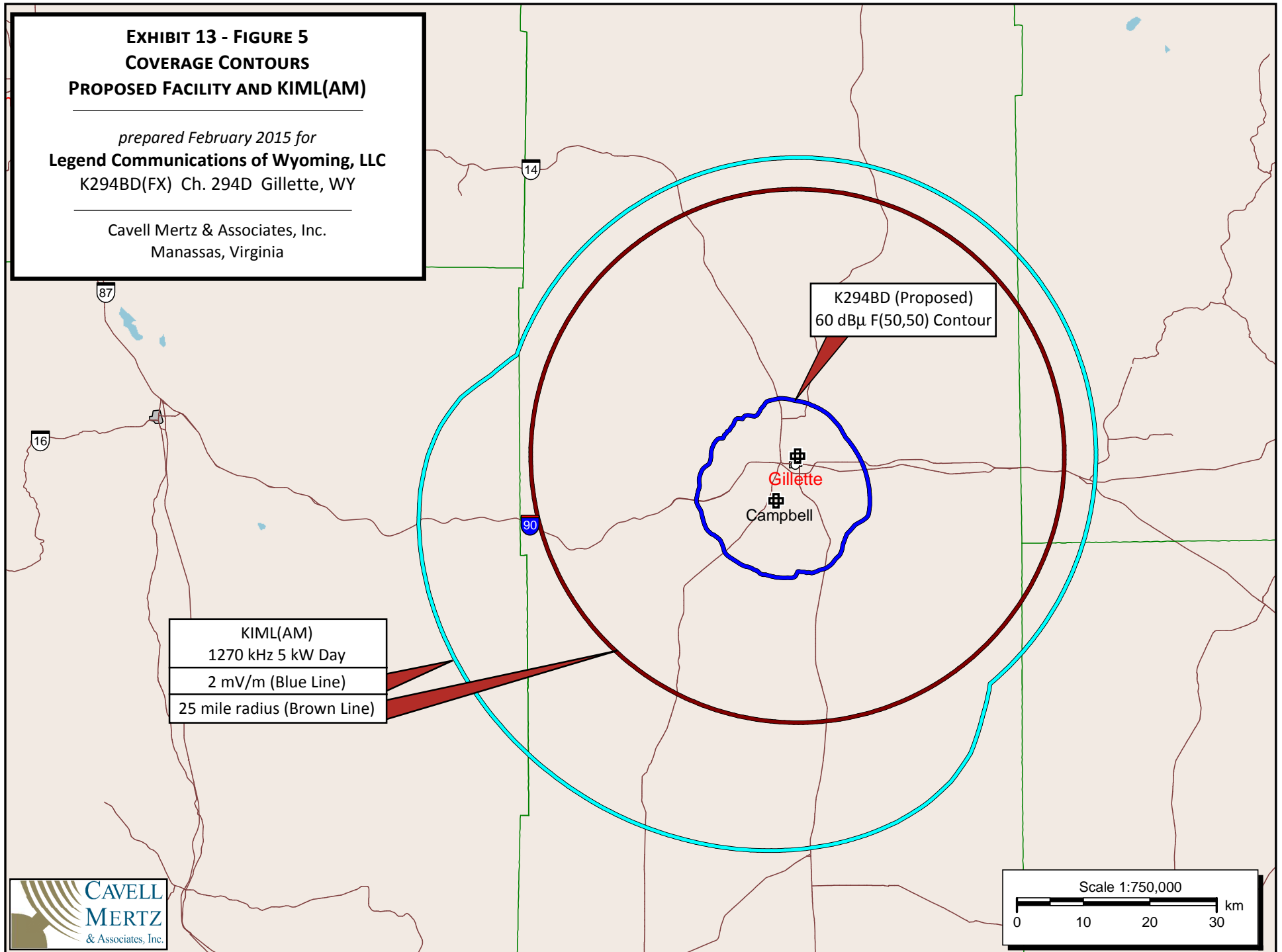
Cavell Mertz & Associates, Inc.



**EXHIBIT 13 - FIGURE 5**  
**COVERAGE CONTOURS**  
**PROPOSED FACILITY AND KIML(AM)**

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**EXHIBIT 13 - FIGURE 6**  
**MUTUAL COVERAGE CONTOUR OVERLAP**  
**LICENSED AND PROPOSED FACILITIES**

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