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COMPREHENSIVE EXHIBIT FOR INTERFERENCE ANALYSIS

This exhibit supports an application for the minor mod of license for K259CF (BLFT-20161229AAP), with proposed new location in Fresno, CA. This proposal complies fully with the requirements of C.F.R. §74.1204(a) with the exception of a facility protected under 47 C.F.R. §74.1204(d) (KWDO) by the Undesired to Desired (U/D) Living Way methodology described below. The proposed modified facility creates no mutual exclusivities with any licensed facilities, or construction permits.

This exhibit contains the Proposed Service exhibit, Contour Overlap Analysis according to C.F.R. §74.1204, the Living Way methodology with analysis to comply with §74.1204(d), a preclusion study for the new location, and RF exposure assessment for the proposed facility.

Proposed Facility

K259CF has presently authorized facilities with file number BLFT-20161229AAP. This application proposes a small move from its authorized location. At the proposed location, a Comet 95SL antenna is proposed. Its radiation center is located 71 feet above ground. The proposed ERP for the facility is 125 watts. The proposed facility serves as a translator with primary station KJOI-FM.

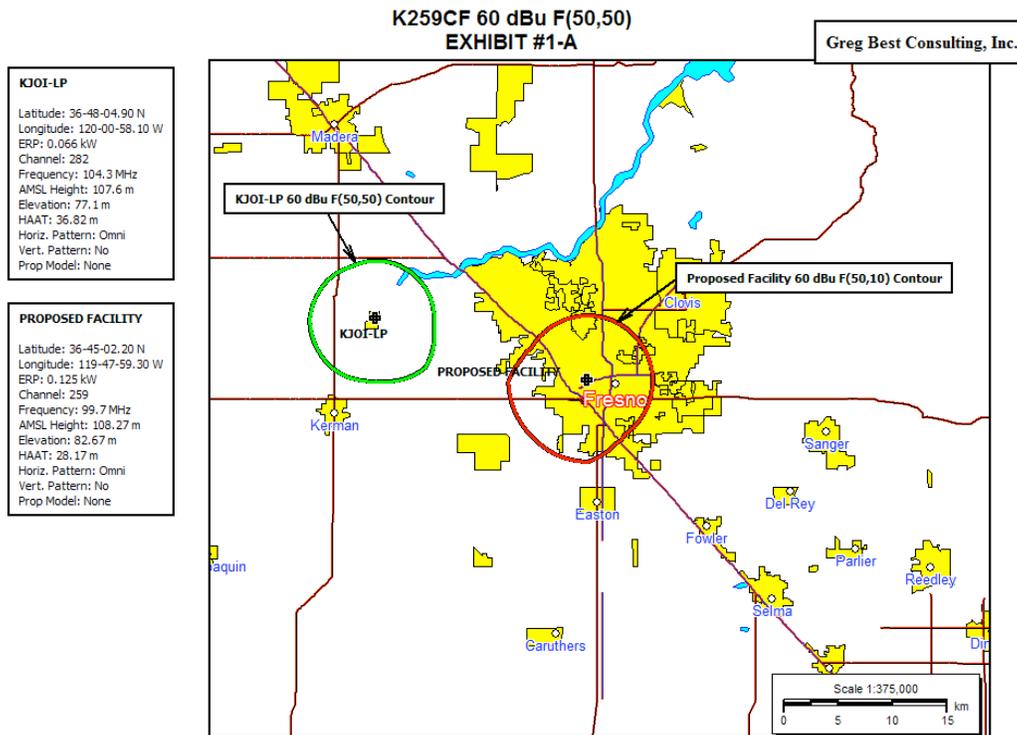


Exhibit #1-A Proposed Translator K259CF to re-transmit KJOI-FM

Interference analysis—Contour Analysis

An interference analysis was conducted using C.F.R. §74.1204. The contour overlap analysis is shown in Exhibit #1-B identifying that no prohibited contour overlap exists, except with KWDO whose protected contour encircles the new proposed location. The contour overlap with KWDO is addressed in the next section of this analysis. The analysis does not consider application #1564460 as it is not a valid accepted application.

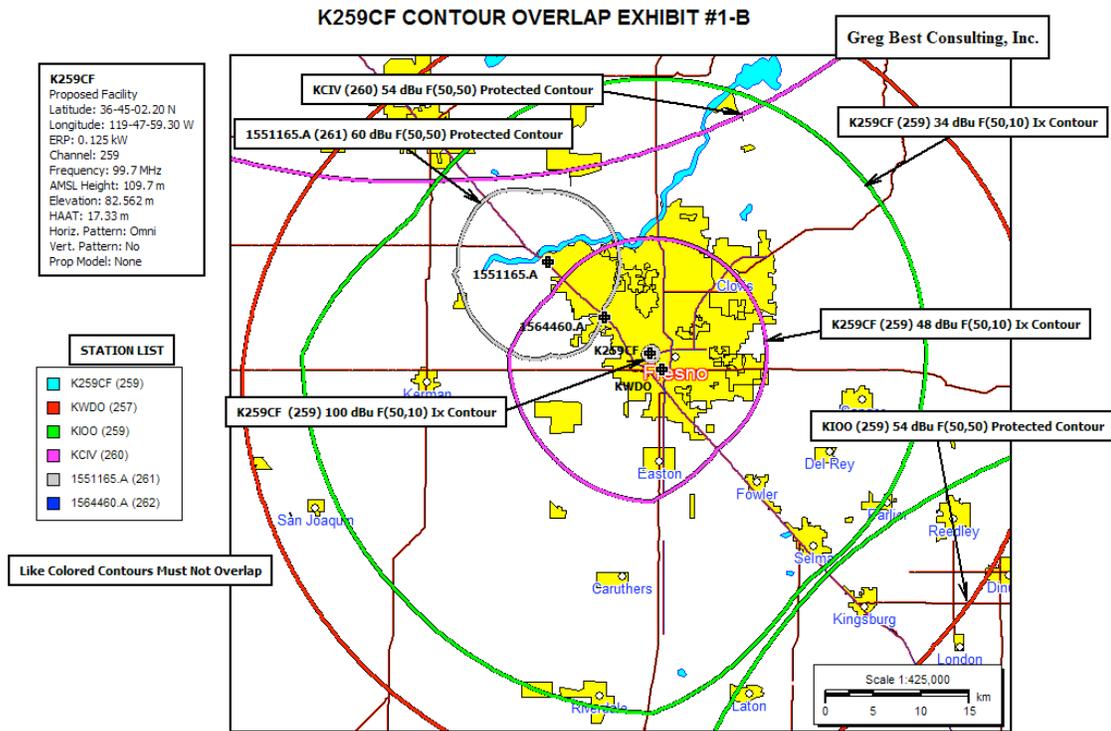


Exhibit #1-B Contour Overlap Analysis for modified K59CF (Like Colors must not overlap)

Undesired to Desired Method

Protection to the KWDO facility is provided through the use of Undesired to Desired Signal Strength Ratio (U/D) calculations according to the widely accepted Living Way exhibits.

The K259CF proposed antenna is a Comet 95SL antenna with radiation center at 21.6 meters RCAGL. The elevation pattern is shown in Exhibit #3.

The KWDO facility produces a field strength calculated at ground level of the proposed K259CF location of 108.0 dBu, as shown on the Close-in Interference Contour Analysis Map, Exhibit #2. For the translator interference contours, free space calculations are used along with the elevation pattern of the proposed antenna. To assure no interference occurs, a 40 dB stronger signal than the KWDO at the K259CF location must not be received at the ground level. The K259CF proposed facility 148 dBu field strength Ix contour was calculated in Exhibit #4-A and plotted in

Exhibit #4-B. The proposed antenna location is 21.6 meters above ground. The height of the K259CF interference signal contour above ground is indicated on Exhibit #4-B. As can be seen, the interfering 148 dBu contour (or higher) field strength level does not reach ground level.

The applicant recognizes that the U/D method is only a tool for predicting likely interference. Should any actual interference be experienced, the applicant will cooperate fully in correcting the interference. Corrective steps may require changes in the transmitting antenna or other steps which would require Commission authorization, may require that the translator cease operation except for brief equipment tests, or may require filtering at the receivers which report interference.

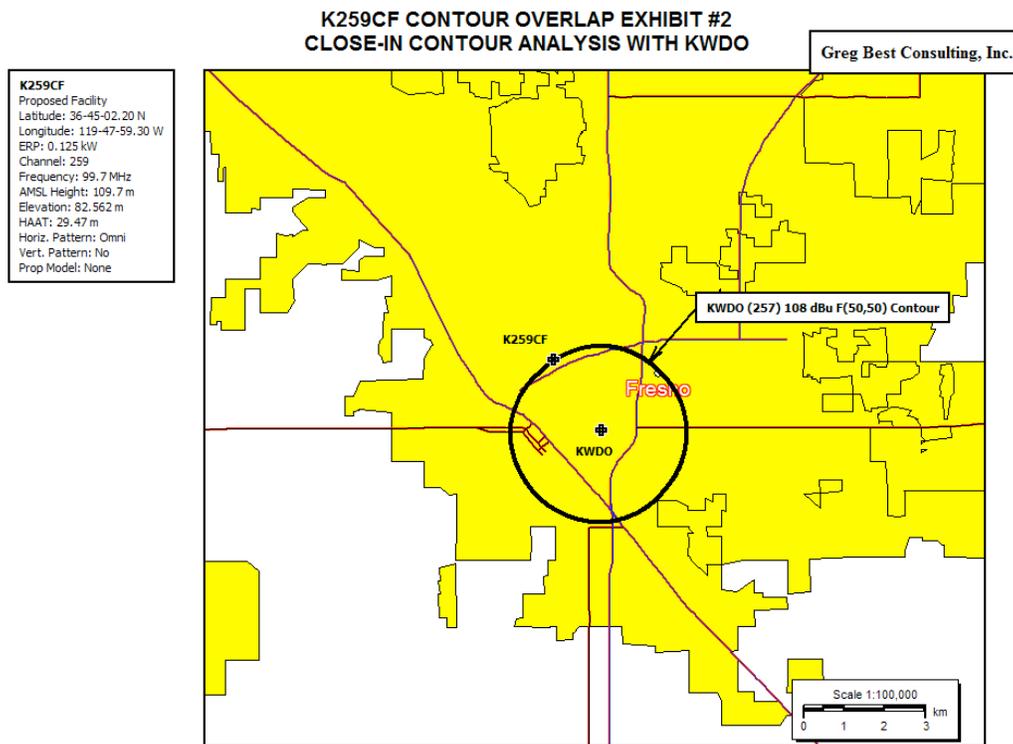


Exhibit #2—Close In Contour Overlap Analysis showing 108 dBu F (50,50) KJZN contour crosses the K259CF new location.

5/8 wave ground plane elevation pattern

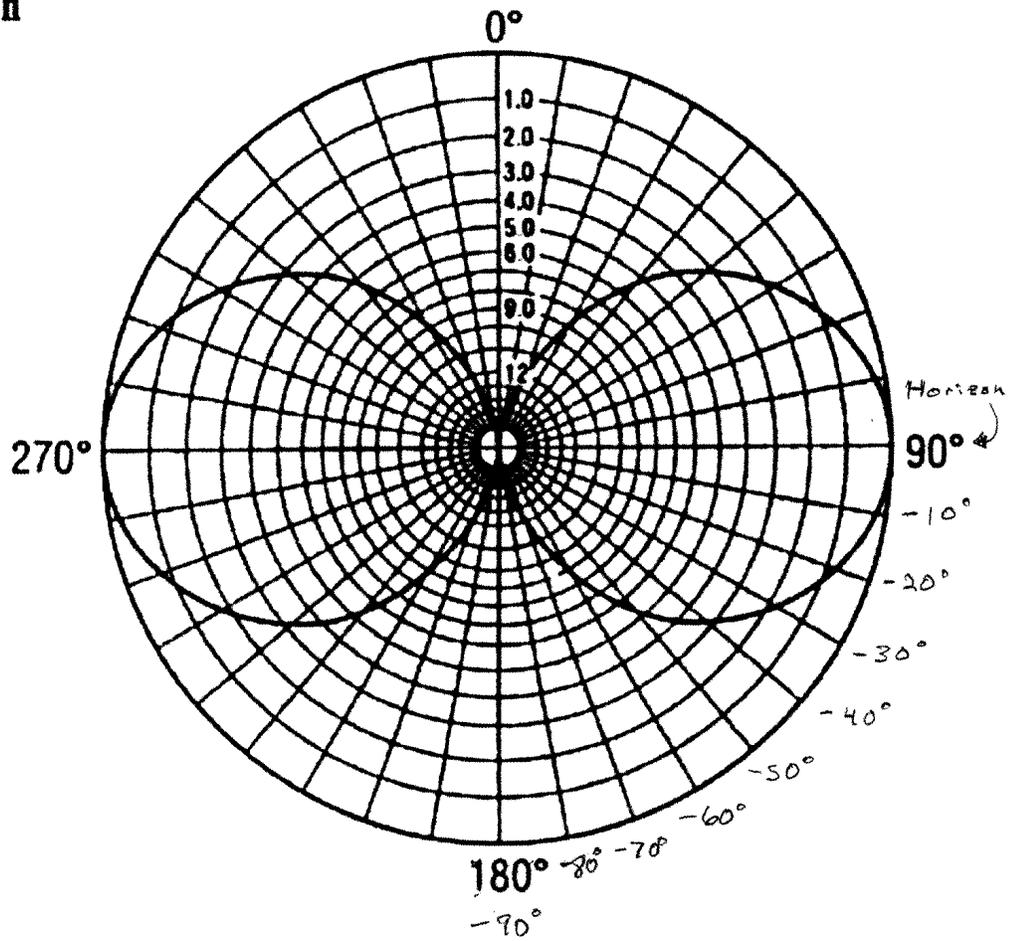
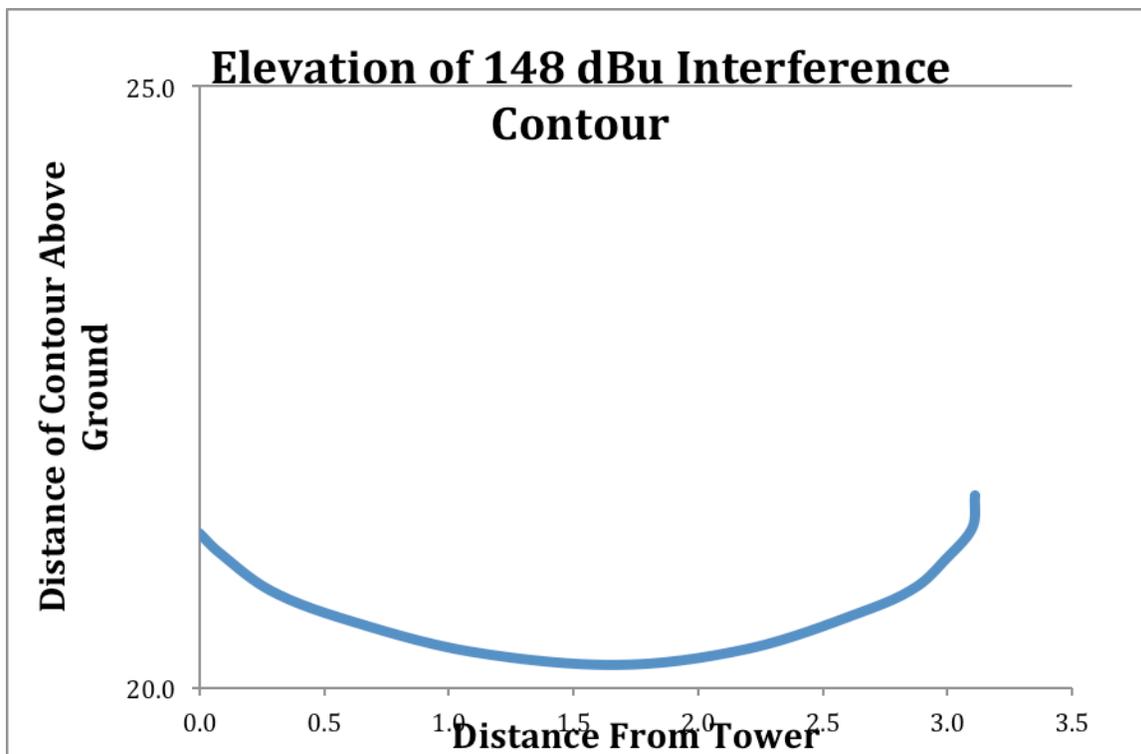


Exhibit #3-- Elevation Pattern of the K259CF antenna with the horizon pointed towards the right side of the page.

Exhibit #4-A—Parameters and Calculation of the 148 dBu signal contour at the K259CF location.

Floating Contour Spreadsheet						
Proposed Station	K259CF					
Protected Station:	KWDO					
dBu @ proposed location:	148					
Proposed RCAGL (m)	21.6					
Proposed ERP (W)	125					
Depression Angle	Distance to contour (m)		E (v/m)	dBu	Distance from Tower (m)	Contour Height (r)
0	3.1		25.216	148.0	3.1	21.6
5	3.1		24.957	147.9	3.1	21.3
10	3.0		25.022	148.0	3.0	21.1
15	3.0		24.825	147.9	2.9	20.8
20	2.8		25.235	148.0	2.7	20.6
30	2.5		24.957	147.9	2.2	20.3
40	2.2		25.047	148.0	1.7	20.2
50	1.7		25.420	148.1	1.1	20.3
60	1.2		24.794	147.9	0.6	20.6
70	0.8		24.957	147.9	0.3	20.8
80	0.5		25.354	148.1	0.1	21.1
90	0.3		24.739	147.9	0.0	21.3
Calculated EIRP	205					
Depression angle	EL Field	Az Field	EIRP @ Angle			
0	1	1	205			
5	0.99	1	200.9205			
10	0.97	1	192.8845			
15	0.94	1	181.138			
20	0.91	1	169.7605			
30	0.81	1	134.5005			
40	0.7	1	100.45			
50	0.55	1	62.0125			
60	0.38	1	29.602			
70	0.27	1	14.9445			
80	0.16	1	5.248			
90	0.1	1	2.05			

Exhibit #4-B--Elevation of interference Contour above Ground (in meters)



Preclusion Study

In addition to the interference study conducted above, a preclusion study was executed at the proposed location. The study indicates no problems for co-channels and adjacent channels.

PRECLUSION STUDY

Fresno, CA
 Latitude 36-45-02.2
 Longitude 119-47-59.3 NAD 83
 Grid Size 21 x 21
 Micro FM 100 Watts at 30m HAAT
 Co-Channel and 1st Adjacent Protected
 2nd Adjacent Channel Not Protected
 3rd Adjacent Channel Not Protected
 I.F. Not Protected
 TV Channel 6 Protected
 CP Records Protected
 APP Records Protected
 FM Translators Protected
 TV Channel 6 Translators/LP Protected
 Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	0	241	38	261	0	281	0
202	0	222	0	242	0	262	0	282	0
203	0	223	3	243	0	263	0	283	136
204	0	224	0	244	0	264	159	284	0
205	0	225	0	245	0	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	175	247	0	267	0	287	0
208	0	228	0	248	0	268	0	288	0
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	0	251	0	271	0	291	0
212	0	232	0	252	0	272	45	292	0
213	0	233	0	253	0	273	0	293	0
214	0	234	0	254	0	274	0	294	61
215	0	235	0	255	0	275	0	295	0
216	0	236	0	256	0	276	139	296	0
217	0	237	0	257	0	277	250	297	0
218	0	238	0	258	0	278	0	298	0
219	0	239	0	259	0	279	0	299	0
300	0								

 Total 1006

RF EXPOSURE

The FM Model RF Exposure program was used with the worst-case antenna to determine if the proposed facility would constitute a RF hazardous RF exposure condition. The results of the FM Model RF exposure study indicates the proposed facility creates a maximum RF exposure level of 10.4 uw/sq. cm. and this is well below the OET Bulletin 65 maximum level for General Population Exposure and therefore no hazardous situation is created.

Source of Data

Transmitter location, effective radiated power, antenna patterns, and elevation data are extracted from the Commission's CDBS for the existing facility stations. All contours for existing and proposed facilities are calculated using height above average terrain calculated at one degree horizontal increments using the FCC broadcast link for FM HAAT. The proposed antenna pattern was provided by the antenna manufacturer.

Sincerely,

A handwritten signature in black ink that reads "Gregory L. Best, PE". The signature is written in a cursive style.

President