

Exhibit 13-E Narrative
Section 74.1233(a) Common Overlap
Request for Mattoon Waiver

Alpine Broadcasting Corp., (“Alpine”), licensee of FM translator K295CH, Facility ID No. 36259, Channel 295D, Harrisonville, Missouri herein request the Commission for a waiver of Section 74.1233(a)(1) that requires that for FM translator minor changes there must be overlap of the FCC F(50,50) 60 dBu contours between the current and proposed modifications.

The Commission has previously waived Section 74.1223(a)(1)¹ where an applicant has demonstrated that: (1) it does not have a history of filing “serial” minor modification applications; (2) the proposed facility is mutually exclusive to its licensed facility; (3) the proposed move would not foreclose future licensing opportunities in the LPFM service in certain markets, and (4) the translator will rebroadcast an AM station as an AM fill-in translator. *This amendment is being filed to change the transmit antenna from horizontal to vertical polarization. This is necessary to demonstrate that the K295CH licensed and proposed facilities are mutually exclusive.*

None of Alpine's four licensed translators have changed transmit locations since 2011. K295CH has been licensed from its current location since September 29, 2011. The proposed K295CH facility is mutually exclusive to the K295CH licensed facility. The proposed facility would not affect any licensed LPFM stations or pending LPFM applications, and the proposed K295CH would rebroadcast AM station KCTE(AM),

¹ *John F. Garziglia, Esq.*, 26 FCC Rcd 12685 (2011) (“*Garziglia*”)

Facility ID No. 64637, 1510 kHz, Independence, Missouri as an AM fill-in translator.

The attached map demonstrates that the proposed K295CH FCC F(50,10) 40 interfering contour does overlap with the licensed K295CH FCC F(50,50) 60 dBu contour. Because both K295CH facilities specify operation on the same frequency, Channel 295D, the two facilities are mutually exclusive.

Therefore it is believed this proposed modification of K295CH is eligible for a waiver of Section 74.1233(a)(1) of the Commission's rules.

Exhibit 13-E
Section 74.1233(a) Waiver Request
K295CH licensed and proposed
sites are mutually exclusive.

