

EXHIBIT 12 – NARRATIVE

Proposed Translator
BNPFT – 20180129AGB
Facility ID 202666
Richardson, TX
Channel 239

This is a Window application, per DA 18 – 986 for a new AM Fill-in translator to re-broadcast AM station KKLF submitted on behalf of Claro Communications, LTD.

Station to be re-broadcast:

KKLF
1700 Khz
Facility ID 86684
Richardson, Texas
Licensee – Claro Communications

Proposed Locations:

NAD(27)
32 – 46 – 13 N
96 – 57 – 37 W

Antenna: Custom Composite two Scala CA5 - CP

The 60 dbu contour of the translator is completely inside of the 2 mV/m limit of KKLF as shown in the attached Exhibit 10 – AM Fill-in compliance.

No new interference is created by this application to any other licensed facility, CP, or application.

Exhibit 10: AM Fill-in Compliance

Exhibit 12: Narrative, Translator 60 db contour overlap, Exhibits 10, 13, and 17 are part of this Exhibit.

Exhibit 13: Overlap Requirements, Overlap Map, Third Adjacent Channel Wavier Request, Aerial Photo of site.

Exhibit 17: Environment – RFE: This facility complies with the requirements 47 CFR 1.1306.

THIRD ADJACENT CHANNEL WAVIER

Applicant is requesting a third adjacent channel wavier to KSCS Facility ID 71201 Fort Worth, Texas channel 242 (96.3 MHz).

KSCS F(50,50) at proposed translator site is 92.6 db.
Proposed translator F(50,10) interfering contour is 132.6 db.

FCC Graph program calculated the distance to this contour (132.6 db) is 23 meters. RCAGL of the proposed translator is 34 meters. This contour is 11 meters above ground level and does not reach 2 meters above ground level. There are no tall buildings, elevated roadways or other structures within 11 meters of the antenna site. Refer to Exhibit 13 – Aerial Photo.

There are no persons inside the 132.5 db contour.

Exhibit 17 – Radio Frequency Exposure

Worse case:

A RCAGL of 34 meters, less 2 meters, specified in this application, the RFE is calculated using the formula

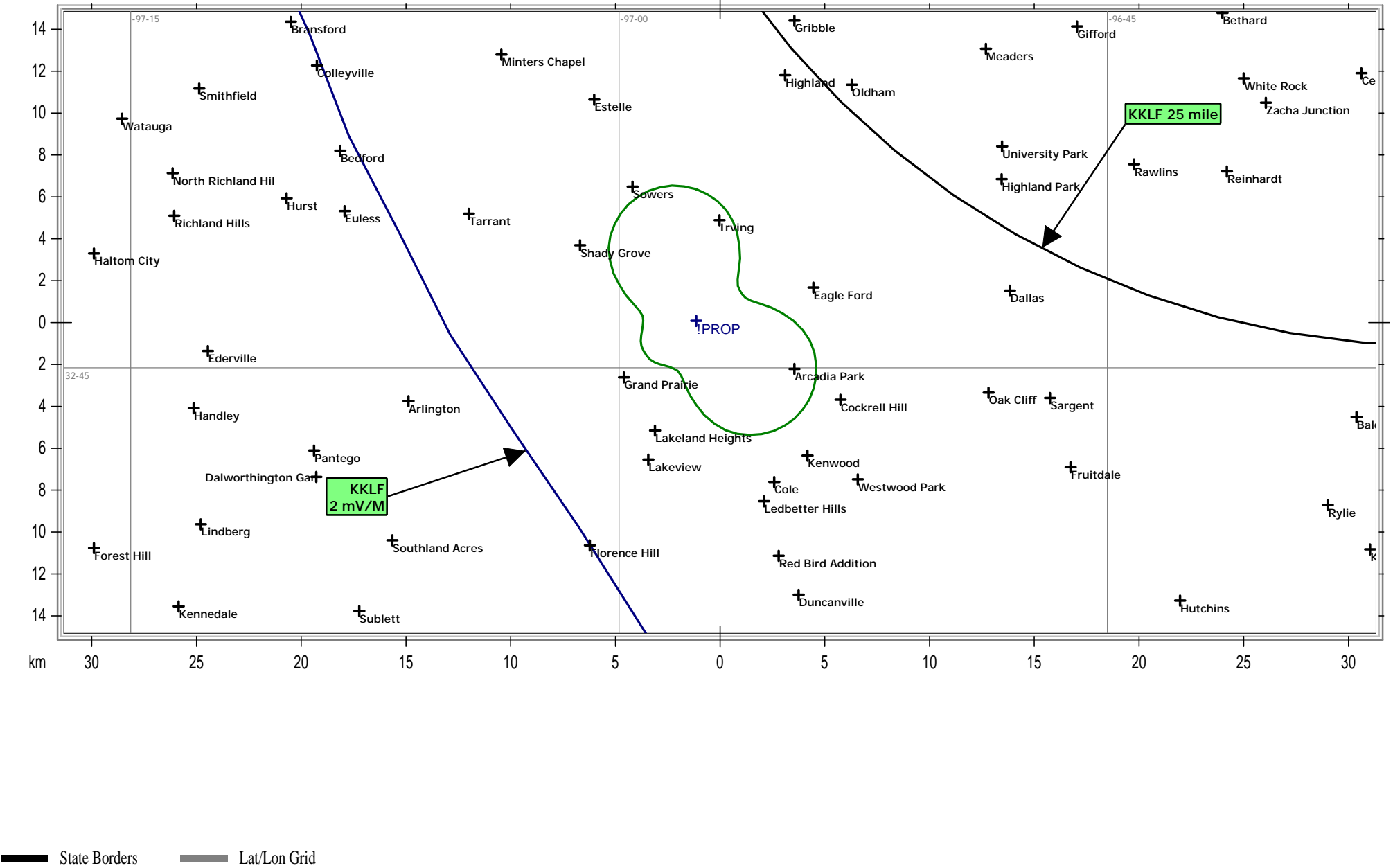
$$S = \frac{33.4 (F^2) ERP}{R^2}$$

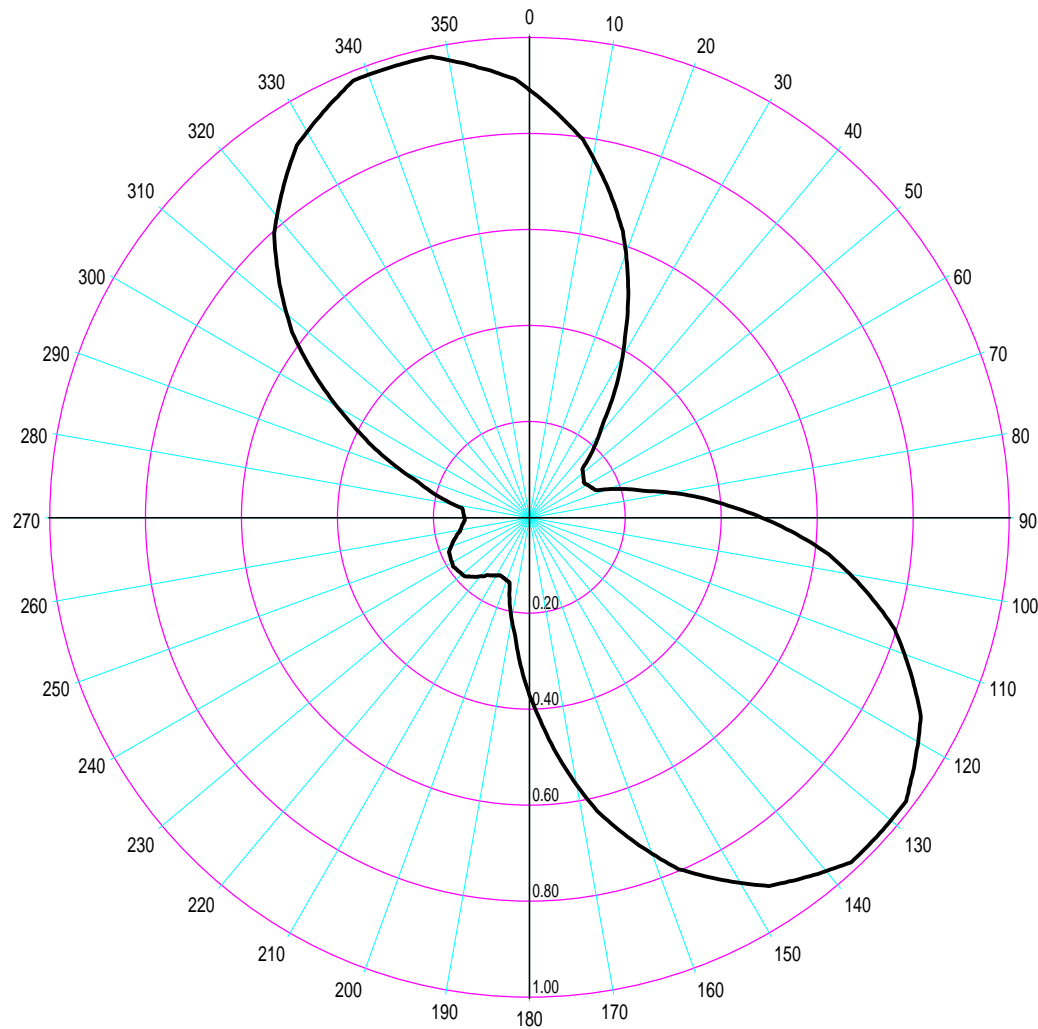
R = 32 meters

ERP = 0.4 kw

F = 1

$S = 13.05 \mu\text{W}/\text{cm}^2$, which is 6.53 % of the $200 \mu\text{W}/\text{cm}^2$ maximum allowable for uncontrolled public access. This proposal is the only RF radiator on this tower. Applicant will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic fields in excess of FCC guidelines.





Azim	Rel.FS	ERP [W]	dBk
0.0	0.891	158.776	-7.992
5.0	0.831	138.112	-8.598
10.0	0.762	116.129	-9.351
15.0	0.678	91.937	-10.365
20.0	0.587	68.914	-11.617
25.0	0.484	46.851	-13.293
30.0	0.387	29.954	-15.235
35.0	0.299	17.880	-17.476
40.0	0.226	10.215	-19.908
45.0	0.173	5.986	-22.229
50.0	0.145	4.205	-23.762
55.0	0.138	3.809	-24.192
60.0	0.138	3.809	-24.192
65.0	0.145	4.205	-23.762
70.0	0.173	5.986	-22.229
75.0	0.226	10.215	-19.908
80.0	0.299	17.880	-17.476
85.0	0.387	29.954	-15.235
90.0	0.484	46.851	-13.293
95.0	0.587	68.914	-11.617
100.0	0.678	91.937	-10.365
105.0	0.762	116.129	-9.351
110.0	0.831	138.112	-8.598
115.0	0.891	158.776	-7.992
120.0	0.935	174.845	-7.573
125.0	0.968	187.405	-7.272
130.0	0.982	192.865	-7.147
135.0	0.982	192.865	-7.147
140.0	0.961	184.704	-7.335
145.0	0.928	172.237	-7.639
150.0	0.879	154.528	-8.110
155.0	0.819	134.152	-8.724
160.0	0.745	111.005	-9.547
165.0	0.661	87.384	-10.586
170.0	0.566	64.071	-11.933
175.0	0.464	43.059	-13.659
180.0	0.370	27.380	-15.626

Azim	Rel.FS	ERP [W]	dBk
185.0	0.282	15.905	-17.985
190.0	0.215	9.245	-20.341
195.0	0.163	5.314	-22.746
200.0	0.139	3.864	-24.129
205.0	0.136	3.699	-24.319
210.0	0.139	3.864	-24.129
215.0	0.147	4.322	-23.643
220.0	0.160	5.120	-22.907
225.0	0.174	6.055	-22.179
230.0	0.184	6.771	-21.693
235.0	0.187	6.994	-21.553
240.0	0.187	6.994	-21.553
245.0	0.184	6.771	-21.693
250.0	0.174	6.055	-22.179
255.0	0.160	5.120	-22.907
260.0	0.147	4.322	-23.643
265.0	0.139	3.864	-24.129
270.0	0.136	3.699	-24.319
275.0	0.139	3.864	-24.129
280.0	0.163	5.314	-22.746
285.0	0.215	9.245	-20.341
290.0	0.282	15.905	-17.985
295.0	0.370	27.380	-15.626
300.0	0.464	43.059	-13.659
305.0	0.566	64.071	-11.933
310.0	0.661	87.384	-10.586
315.0	0.745	111.005	-9.547
320.0	0.819	134.152	-8.724
325.0	0.879	154.528	-8.110
330.0	0.928	172.237	-7.639
335.0	0.961	184.704	-7.335
340.0	0.982	192.865	-7.147
345.0	0.982	192.865	-7.147
350.0	0.968	187.405	-7.272
355.0	0.935	174.845	-7.573

EXHIBIT 12

Aerial Photo of site

Legend

Ch 239

Ch 239

MacArthur Blvd

Google Earth

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200 m



**EXHIBIT 13
OVERLAP REQUIREMENTS
NEW CH 239**

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
!NEW	TX	RICHARDSON	95.7	239	145	D	APP	10.3	0	-59.51 dB
KSCS	TX	FORT WORTH	96.3	242	99000	C	LIC	20.28	0	-33.38 dB
K239CC	TX	BURLESON	95.7	239	250	D	LIC	36.78	0	0.89 dB
NEW	TX	DALLAS	95.9	240	250	D	APP	21.54	0	-0.31 dB
K238CC	TX	DALLAS	95.5	238	250	D	CP	11.68	0	-0.38 dB
KRQP-LP	TX	ARLINGTON	95.5	238	58	LP100	LIC	12.74	13	3.42 dB
K239CZ	TX	PLANO	95.7	239	124	D	CP	31.72	0	4.21 dB
KVWR-LP	TX	DALLAS	95.5	238	70	LP100	LIC	20.19	13	6.95 dB
KFWR	TX	JACKSBORO	95.9	240	100000	C0	CP	103.6	0	6.37 dB
KFWR	TX	JACKSBORO	95.9	240	100000	C0	LIC	103.6	0	6.38 dB
K240DS	TX	GARLAND	95.9	240	115	D	LIC	38.08	0	10.32 dB
KHYI	TX	HOWE	95.3	237	17000	C2	LIC	79.24	0	10.76 dB
K239CG	TX	BONHAM	95.7	239	250	D	LIC	110.86	0	19.22 dB
K293CM	TX	DALLAS	106.5	293	100	D	LIC	20	0	20
NEW	TX	FORT WORTH	95.3	237	150	D	APP	31.52	0	20.18 dB
NEW	TX	FORT WORTH	95.3	237	150	D	APP	31.52	0	20.18 dB
KSGV-LP	TX	SEAGOVILLE	95.5	238	27	LP100	LIC	41.95	13	21.47 dB
NEW	TX	DALLAS	106.5	293	5	D	APP	21.54	0	21.5
NEW	TX	DALLAS	95.3	237	250	D	APP	21.54	0	22.45 dB
KWAH-LP	TX	ENNIS	95.5	238	100	LP100	LIC	59.26	13	25.69 dB
KYEN-LP	TX	ENNIS	95.9	240	100	LP100	CP	57.38	13	25.78 dB
KKAJ-FM	OK	DAVIS	95.7	239	50000	C2	LIC	180.49	0	25.42 dB
KBGO	TX	WACO	95.7	239	24000	C2	LIC	141.03	0	26.65 dB
K239CB	TX	TYLER	95.7	239	250	D	CP MOD	164.73	0	27.20 dB
K239CB	TX	TYLER	95.7	239	250	D	LIC	164.73	0	27.20 dB
KYNC-LP	TX	SACHSE	95.7	239	16	LP100	LIC	60.75	24	27.47 dB
K239AM	TX	PALESTINE	95.7	239	250	D	LIC	168.15	0	28.90 dB
KOME-FM	TX	MERIDIAN	95.3	237	11000	C3	LIC	111.86	0	28.78 dB
KCKL	TX	MALAKOFF	95.9	240	6000	A	LIC	115.73	0	32.10 dB
KFCE-LP	TX	WILLS POINT	95.5	238	50	LP100	LIC	89.48	13	35.07 dB
K238CC	TX	DECATUR	95.5	238	25	D	LIC	95.38	0	36.11 dB
K239CT	TX	LONGVIEW	95.7	239	250	D	CP	213.89	0	38.46 dB
KITX	OK	HUGO	95.5	238	50000	C2	LIC	185.66	0	38.29 dB
KSCH	TX	SULPHUR SPRINGS	95.9	240	6000	A	LIC	133.77	0	39.87 dB

