Technical Statement

and Exhibits

in support of a Minor Modification

to

Commercial FM Station Construction Permit

BNPH-20091019AFR

Channel 228A

Stuart, OK

March 10, 2013

EXHIBIT II-4

MULTIPLE OWNERSHIP SHOWING
STUART, OK 228A

The instant application proposes a facility to be licensed to the community of Stuart, Oklahoma, which is not within any Arbitron-rated market.

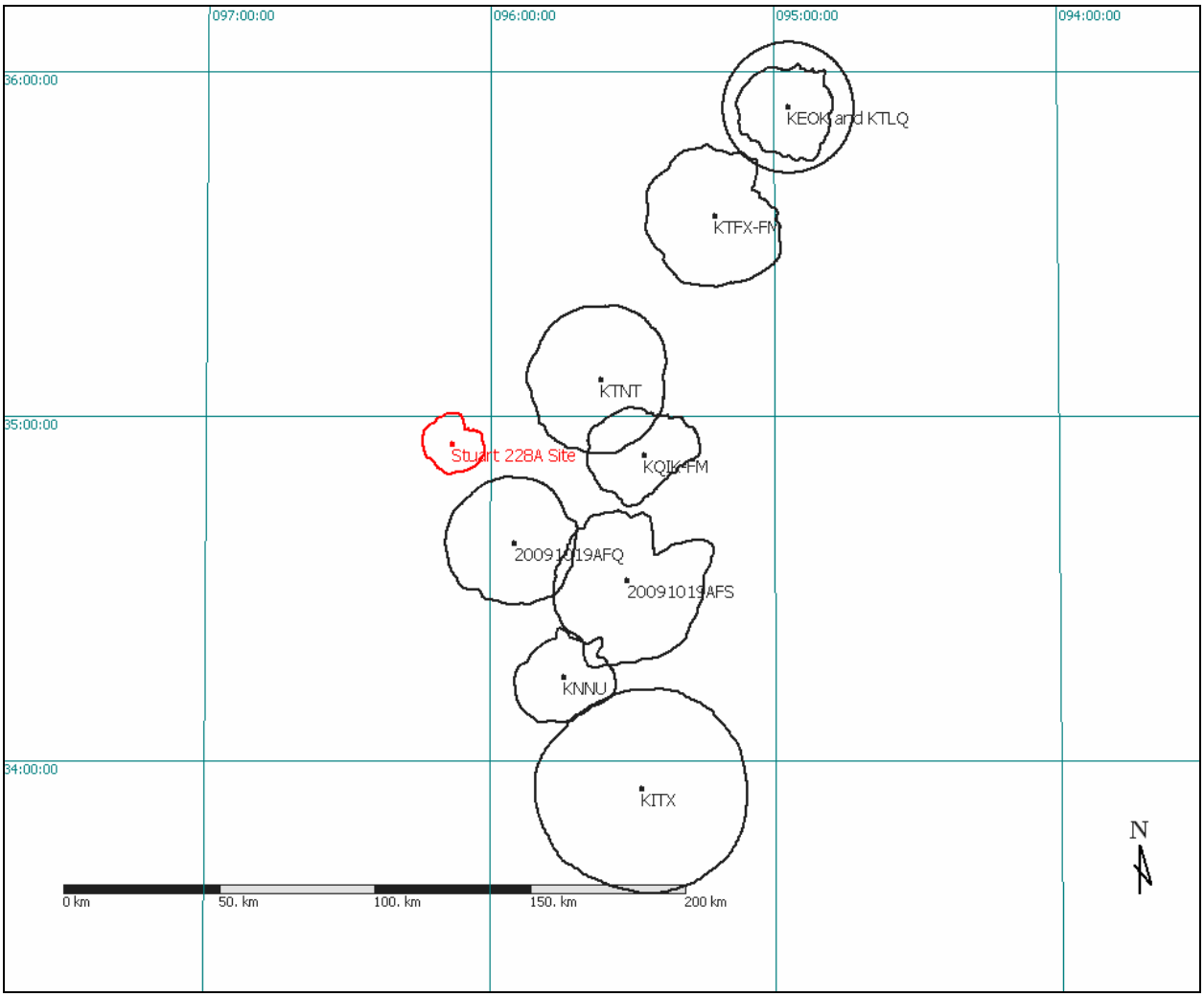
Accordingly, an ownership analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database.

The service contours were plotted using correct map projection mathematics. All contours have been labeled. A list of all stations considered is included with this statement.

The Applicant possesses an attributable interest in the following stations and construction permits:

- Stuart, OK New 228A CP (The instant application.)
- Kiowa, OK New 254C3 CP
- Clayton, OK New 262C3 CP
- Haileyville, OK New 290A.AP
- KEOK(FM) 271A Tahlequah, OK
- KITX(FM) 238C2 Hugo, OK
- KNNU(FM) 222C2 Antlers, OK
- KTFX(FM) 269C3 Warner, OK
- KTLQ(AM) 1350 kHz Tahlequah, OK
- KTNT(FM) 273C3 Eufaula, OK

The following illustration demonstrates that the city grade contour of the facility proposed in the instant application (red) does not overlap the city grade contour of any other facility (black) in which the Applicant has an attributable interest.



The Multiple Ownership Rules always permit a party to possess an attributable interest in only one facility within a market. Therefore, the Applicant's proposal within the instant application complies with 47 C.F.R. § 73.3555(a).

EXHIBIT III-13A

ALLOTMENT CHANGE IN
CLASS TO
STUART, OK 228A

This technical report has been developed in support of an application for a minor modification to the Stuart OK 228C3 allocation. The Applicant requests a change in class to Class A.

Allocation Analysis

The Stuart, OK 228A allocation will be located at:

N 34-54-57 W 96-8-10 (NAD27)

The spacing study on the following page (Exhibit III-13B) demonstrates that the proposed Stuart 228A allotment site meets the domestic co-channel and adjacent channel spacing requirements for Class A stations as prescribed in § 73.207 of the Commission's Rules. The spacing study also demonstrates that this proposal is mutually-exclusive with retention of the existing allotment of Channel 228C3 at Stuart.

Furthermore, as demonstrated in Exhibit III-13C, the proposed allotment will provide minimum signal strength of at least 70 dBu to the entire community of Stuart, OK.

EXHIBIT III-13B

ALLOTMENT CHANGE IN
CLASS TO
STUART, OK 228A

The following table demonstrates that the proposed allotment is fully spaced pursuant to 47 C.F.R. § 73.207 to every existing station, construction permit, and allotment other than the one the instant application proposes to modify.

Facility_ID	Callsign	Latitude (NAD27)	Longitude (NAD27)	City	State	Channel	Adjacency	Class	73 207 Min Separation	Distance	73 207 Clearance
183382	20091019AFR	N34:48:25	W096:07:35	STUART	OK	228 : 93.5 MHz	Co-Chan	C3	142	12.1	-129.9
50168	KJKE	N35:11:28	W097:35:49	NEWCASTLE	OK	227 : 93.3 MHz	1st Adj	C1	133	136.7	3.7
63336	KISR	N35:31:22	W094:23:32	FORT SMITH	AR	229 : 93.7 MHz	1st Adj	C*	165	172.5	7.5
190411	KWLB	N34:55:01	W095:19:46	RED OAK	OK	226 : 93.1 MHz	2nd Adj	C3	42	73.7	31.7
36289	KNOR	N33:29:05	W097:24:44	KRUM	TX	229 : 93.7 MHz	1st Adj	C0	152	197.6	45.6
21597	KIKT	N33:13:16	W095:41:20	COOPER	TX	228 : 93.5 MHz	Co-Chan	C3	142	192.5	50.5
55707	KBEZ	N36:11:26	W096:05:50	TULSA	OK	225 : 92.9 MHz	3rd Adj	C0	86	141.5	55.5
63438	KSPI-FM	N36:06:30	W097:11:47	STILLWATER	OK	229 : 93.7 MHz	1st Adj	C2	106	163.6	57.6
28850	KTSO	N36:07:52	W096:04:13	GLENPOOL	OK	231 : 94.1 MHz	3rd Adj	C1	75	135.0	60.0
21597	KIKT (CP)	N33:11:00	W096:03:19	GREENVILLE	TX	228 : 93.5 MHz	Co-Chan	A	115	192.3	77.3
7992	KOYN	N33:49:36	W095:27:49	PARIS	TX	230 : 93.9 MHz	2nd Adj	C2	55	135.7	80.7
77588	KMKT	N33:41:31	W096:26:36	BELLS	TX	226 : 93.1 MHz	2nd Adj	C3	42	138.7	96.7

EXHIBIT III-13C

ALLOTMENT CHANGE IN
CLASS TO
STUART, OK 228A

The proposed Channel 2228A allotment site is 3.2 km from the corporate limits of Stuart. The far side of Stuart is approximately 4.3 kilometers from the allotment site. The standard 70 dBu contour distance for a Class A facility is 16.2 km.

Therefore, and as depicted on the following contour map, the proposed allotment will provide 70 dBu service to 100% of Stuart, OK.

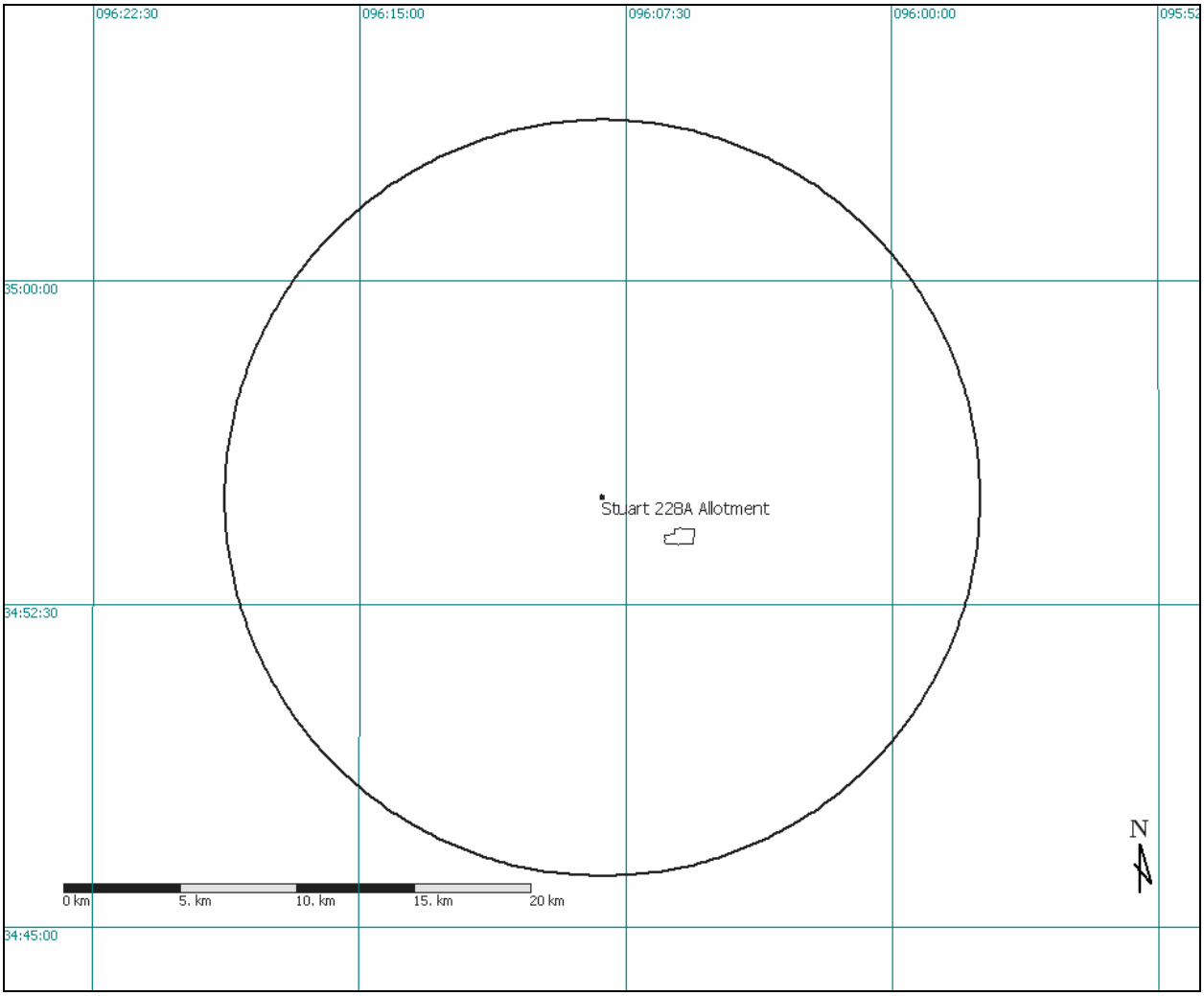


EXHIBIT III-14

COMMUNITY COVERAGE
STUART, OK 228A

The following illustration demonstrates that Stuart, OK lies entirely within the 70 dBu contour of the proposed facility. Therefore, the instant application complies with 47 C.F.R. § 73.315.

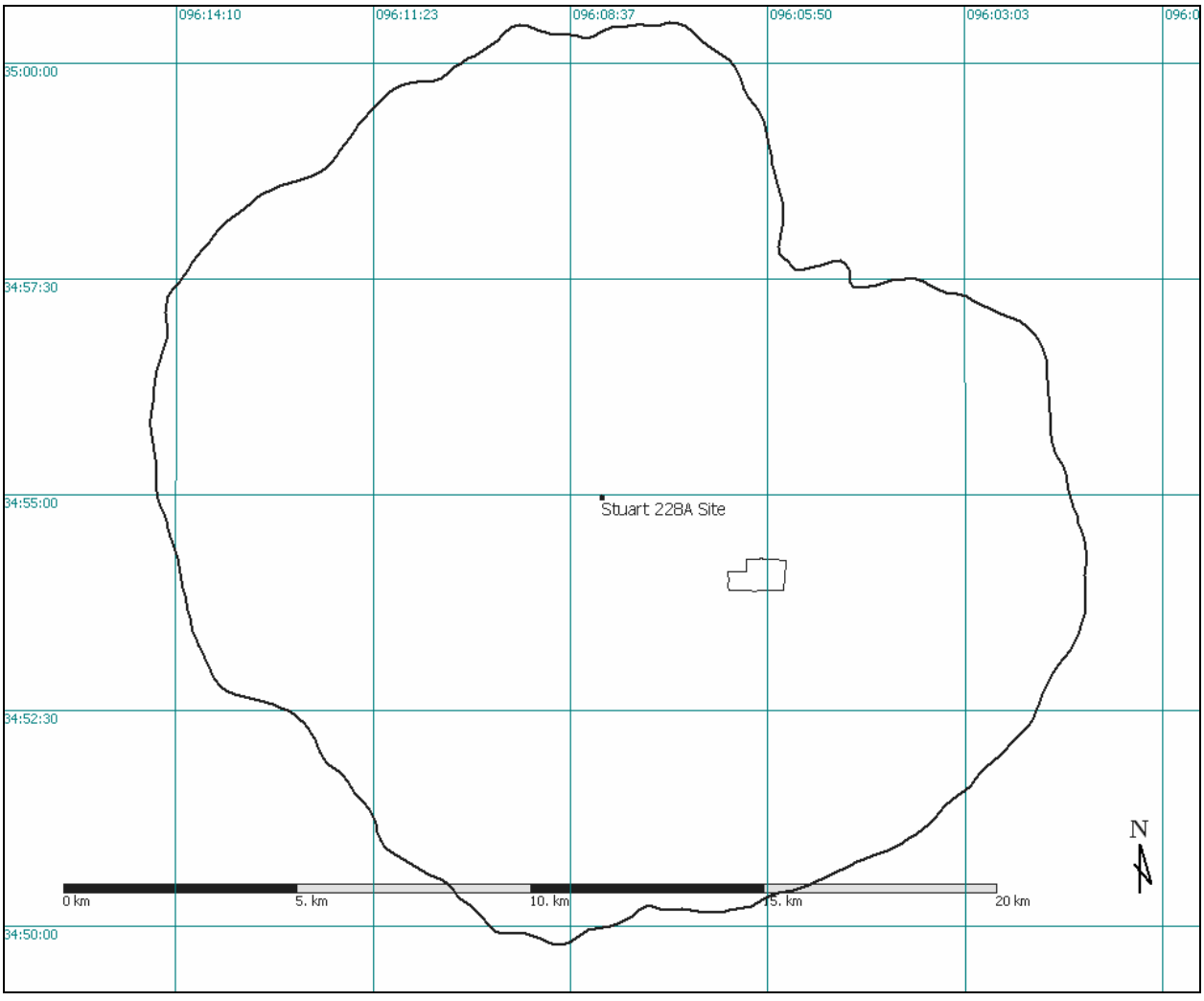


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EXHIBIT III-16A

SEPARATION REQUIREMENTS
STUART, OK 228A

The following table demonstrates that the proposed facility is fully spaced pursuant to 47 C.F.R. § 73.207 to every existing station, construction permit, and allotment other than the one the instant application proposed to replace.

Facility_ID	Callsign	Latitude (NAD27)	Longitude (NAD27)	City	State	Channel	Adjacency	Class	73 207 Min Separation	Distance	73 207 Clearance
183382	20091019AFR	N34:48:25	W096:07:35	STUART	OK	228 : 93.5 MHz	Co-Chan	C3	142	12.1	-129.9
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EXHIBIT III-17

RADIOFREQUENCY RADIATION IMPACT
STUART, OK 228A

The proposed facility will not result in human exposure to radiofrequency (RF) radiation in excess of safety standards specified in Section 1.1307(b). Effective October 15, 1997, the FCC adopted revised guidelines and procedures for evaluating the environmental effects of RF emissions. These revised guidelines incorporate two tiers of exposure limits based on whether exposure occurs in a "controlled" (occupational) situation of an "uncontrolled" (general population) situation. Based on the methods published in OET Bulletin No. 65 (entitled "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields"), the predicted power density value produced by the proposed facility will be well below the established ANSI guideline limits.

Verification of compliance with FCC-specified guidelines for human exposure to RF radiation was determined utilizing the equations and graphs set forth in OET Bulletin No. 65. The bulletin prescribes that the fraction of the recommended limit incurred within each frequency interval should be determined and that the sum of all fractional contributions should not exceed 100%.

The proposed facility will operate on an existing tower with a radiation centerline at 19.0 meters above ground level (AGL) and an ERP of 900 watts on Channel 228 operating with circular polarization. The Applicant intends to use a four-bay OMB MP-4 antenna. The antenna will employ 3/4 wave spacing.

Utilizing FMMODEL it was determined that the highest value of power density occurs at 10.4 meters from the base of the tower. The power density at this location is 8.44 uW/cm² or 4.22% of the 200 uW/cm² MPE limit for uncontrolled/general exposures. It is 0.844% of the MPE for occupational/controlled areas.

Since the proposed power density is less than 100 percent of the ANSI guideline, the proposed facility complies with FCC requirements regarding radiofrequency radiation. In addition, the base of the tower will be fenced and warning signs will be posted at appropriate intervals to preclude casual access.

Furthermore, the applicant will ensure protection to station personnel working in the vicinity of their antenna. Access to the antenna supporting tower base will be restricted to authorized personnel only. The applicant for the proposed station will reduce power or cease operation, when appropriate and deemed necessary, during times of service or maintenance of the transmitting system or when work is being performed on the tower to avoid potentially harmful exposure to station personnel or workers. The applicant will initiate joint procedures with common users to be followed during times of service or maintenance of the transmission systems when necessary to avoid potentially harmful exposure to personnel.