COMPREHENSIVE TECHNICAL EXHIBIT
REQUEST FOR SPECIAL TEMPORARY AUTHORITY

FM Translator Station K209EC
BLFT-20010724ABT / Facility ID: 92765
Kansas City, Missouri

Community Broadcasting, Inc.

June, 2012

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REQUEST FOR SPECIAL TEMPORARY AUTHORITY

The following engineering statement and attached exhibits have been prepared for **Community Broadcasting, Inc.** ("CBI"), licensee of FM translator station K209EC at Kansas City, Missouri, and are in support of their request for special temporary authority.[1]

This request proposes the use of an alternate site by the translator in order to return to operation on a temporary basis until the construction of the new permanent facility can be implemented. The translator was acquired by the current licensee in 2010. The licensed transmitter site is no longer available. The translator has been silent since June 29, 2011, thus implementation of this STA is necessary to preserve the license until issues plaguing the facility authorized in BPFT-20111214ADM can be rectified. CBI has been working to implement a final facility for the translator, and will continue to do so while operating pursuant to the parameters proposed in this STA.

K209EC is licensed to operate with an effective radiated power of 205 Watts at a center of radiation of 343 meters AMSL from the tower bearing 1057465 as its antenna structure registration number utilizing a directional antenna. The proposed STA facility would operate with an effective radiated power of 3 Watts at a center of radiation of 482 meters AMSL utilizing an Electronics Research, Inc. (ERI) LPX-2E non-directional antenna. The tower on which this antenna is located has been assigned 1211744 as its antenna structure registration number. This combination of parameters causes the predicted 60 dBu service contour of the STA to be wholly contained within

[1] The Facility ID for K209EC at Kansas City, Missouri is 92765.

the predicted 60 dBu service contour of the licensed facility. Exhibit E-1 illustrates the predicted 60 dBu contour of the licensed translator facility, and the proposed STA facility.

The primary station during the operation of the special temporary authority would be co-owned KSIV-FM at St. Louis, Missouri.[2] Due to the distance separation between the two facilities, the translator would not function as a fill-in translator. Of the twelve translator cardinal radials, the 180 degree true radial has the lowest average elevation at 191.9 meters above mean sea level. This results in the transmitting antenna having a center of radiation of 191.9 meters above average terrain. The proposed maximum effective radiated power of 3 Watts is consistent with the power/height limitation table in Section 74.1235(b)(2) of the Commission's Rules. Delivery of program material to the translator will be via an internet stream.

The proposed STA would not result in predicted interference to any proposed or authorized facility. Exhibit E-2 is a tabular allocation study for the proposed facility. This study demonstrates that there is predicted contour overlap with KCUR-FM and KKFI, both at Kansas City, Missouri, but this overlap would not result in predicted interference to either facility.[3] The tabular allocation study is illustrated in the map that is Exhibit E-3.

Although there would be normally prohibited contour overlap between the proposed facility and both KCUR-FM and KKFI, no interference to either facility would result. Both KCUR-FM and KKFI are located in close proximity to the proposed K209EC STA site. Respectively they are

[2] The Facility ID for KSIV-FM at St. Louis, Missouri is 4276.
[3] The Facility ID for KCUR-FM at Kansas City, Missouri is 14738. The Facility ID for KKFI at Kansas City, Missouri is 41857.

located 1.11 and 0.95 kilometers distant. Exhibit E-4 illustrates the predicted field strength by the FCC method of these two stations in the immediate vicinity of the STA facility.

The predicted field strength of KCUR-FM is 126 dBu, while that of KKFI is 127.5 dBu. Since KCUR-FM and KKFI are both second adjacent to the proposed translator STA, interference is assumed to occur when the undesired signal from the translator is more than 40 dB above the signal level of the desired FM facilities. For brevity it will be assumed that the field strength in both cases is 126 dBu, thus interference is predicted to occur only in those areas where the translator field strength is 166 dBu or greater. It can logically be inferred that this area would be at an extremely close range from the proposed translator antenna. Since the translator antenna is located 213 meters above ground level, it logically follows that any interference area, should it exist, would be highly localized in the vicinity of the antenna some 700 feet above ground level.

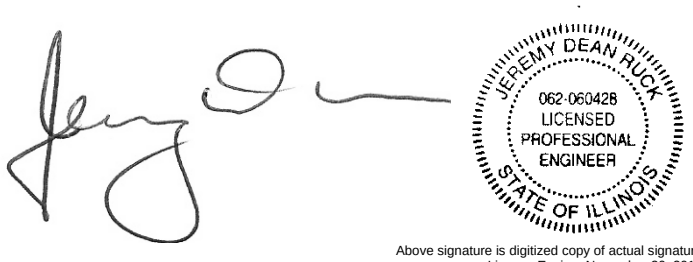
More simply the effective radiated power of both KCUR-FM and KKFI is 100 kW. The proposed ERP of the translator is 3 Watts. The difference between these two values is 45 dB. By this difference alone it can logically be inferred that no interference would result to either station.

The proposed facility would comply with the television channel six interference provisions of Section 74.1205. The closed proposed or authorized facility operating on channel six of any type is at Columbia, MI, and is located 186 kilometers from the site of the proposed translator. The table in Section 74.1205 specifies that a channel six station located less than 135 kilometers from the proposed translator must be considered. The actual distance between the proposed STA site and the site of any television channel six facility is 185.94 kilometers. Therefore, the proposed facility would not affect any channel six facilities.

The proposed facility would not constitute a significant environmental impact. An existing tower registered with the Commission would be utilized. Thus, the addition of the translator would not increase the existing environmental impact already present from the structure. The facility would not result in general population exposure to levels of non-ionizing radiation in excess of the applicable safety standards.

From the Commission's *FM Model* software package, the predicted power density at ground level is 0.00065 $\mu W/cm^2$. This is 0.0003 percent of the upper limit of 200 $\mu W/cm^2$ permissible. The proposed facility is therefore categorically excluded. CBI certifies that it will coordinate with all other users of the site to ensure that workers are not exposed to levels of non-ionizing radiation in excess of the applicable safety standards. Such coordination will include, but is not necessarily limited to, a reduction in power or cessation of operation as necessary.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2013

Jeremy D. Ruck, PE
June 15, 2012

JEREMY RUCK & ASSOCIATES, INC.
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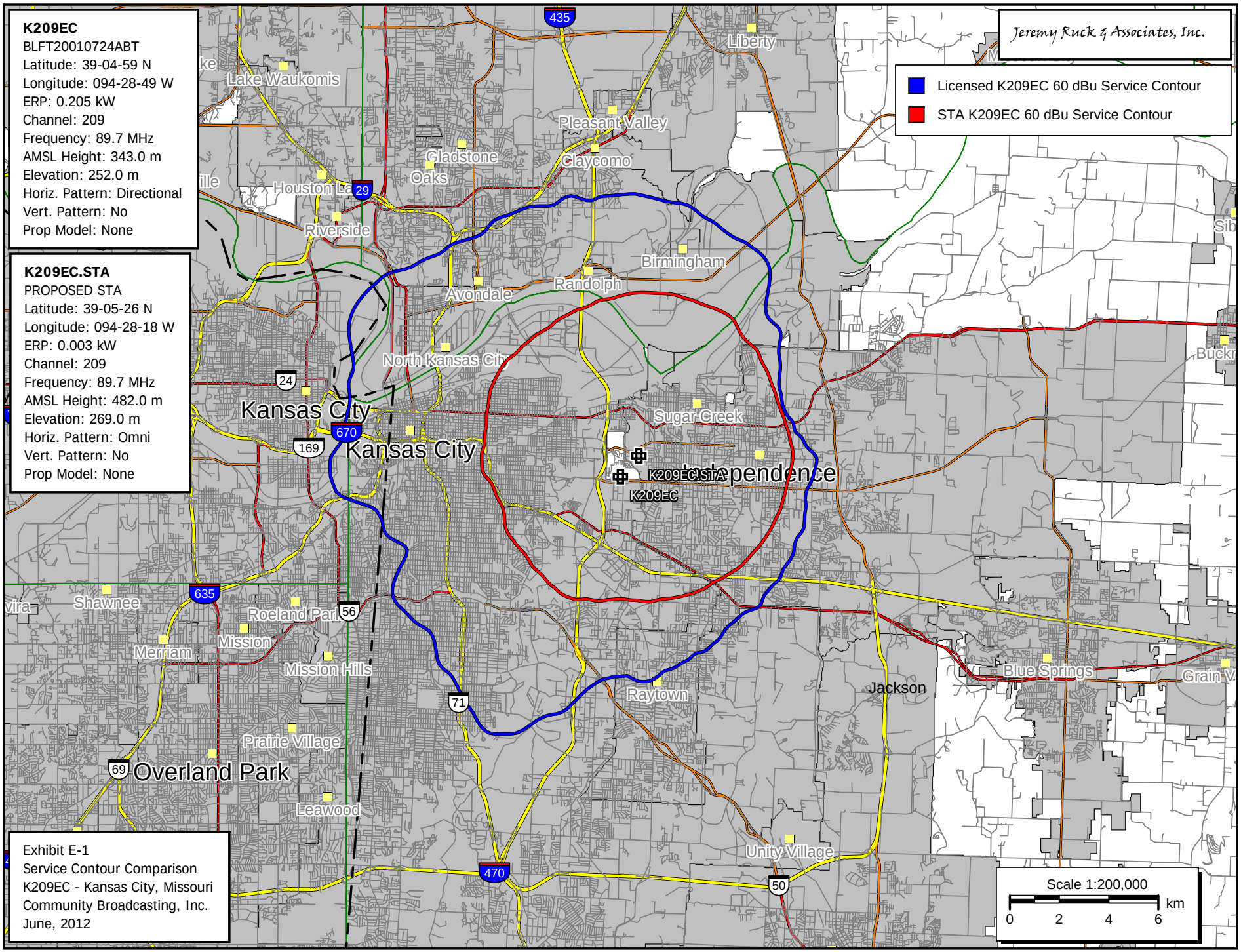

K209EC
BLFT20010724ABT
Latitude: 39-04-59 N
Longitude: 094-28-49 W
ERP: 0.205 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 343.0 m
Elevation: 252.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None
K209EC.STA
PROPOSED STA
Latitude: 39-05-26 N
Longitude: 094-28-18 W
ERP: 0.003 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 482.0 m
Elevation: 269.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Jeremy Ruck & Associates, Inc.
Licensed K209EC 60 dBu Service Contour
STA K209EC 60 dBu Service Contour
Exhibit E-1
Service Contour Comparison
K209EC - Kansas City, Missouri
Community Broadcasting, Inc.
June, 2012
Scale 1:200,000
km
0 2 4 6
Kansas City
Overland Park
Independence
Liberty
Lake Waukomis
Pleasant Valley
Claycomo
Gladstone
Oaks
Houston Lake
Riverside
Birmingham
Randolph
Avondale
North Kansas City
Sugar Creek
K209EC STA
K209EC
Shawnee
Roeland Park
Mission
Merriam
Mission Hills
Prairie Village
Leawood
Raytown
Jackson
Blue Springs
Unity Village
435
29
24
670
169
635
56
71
69
470
50

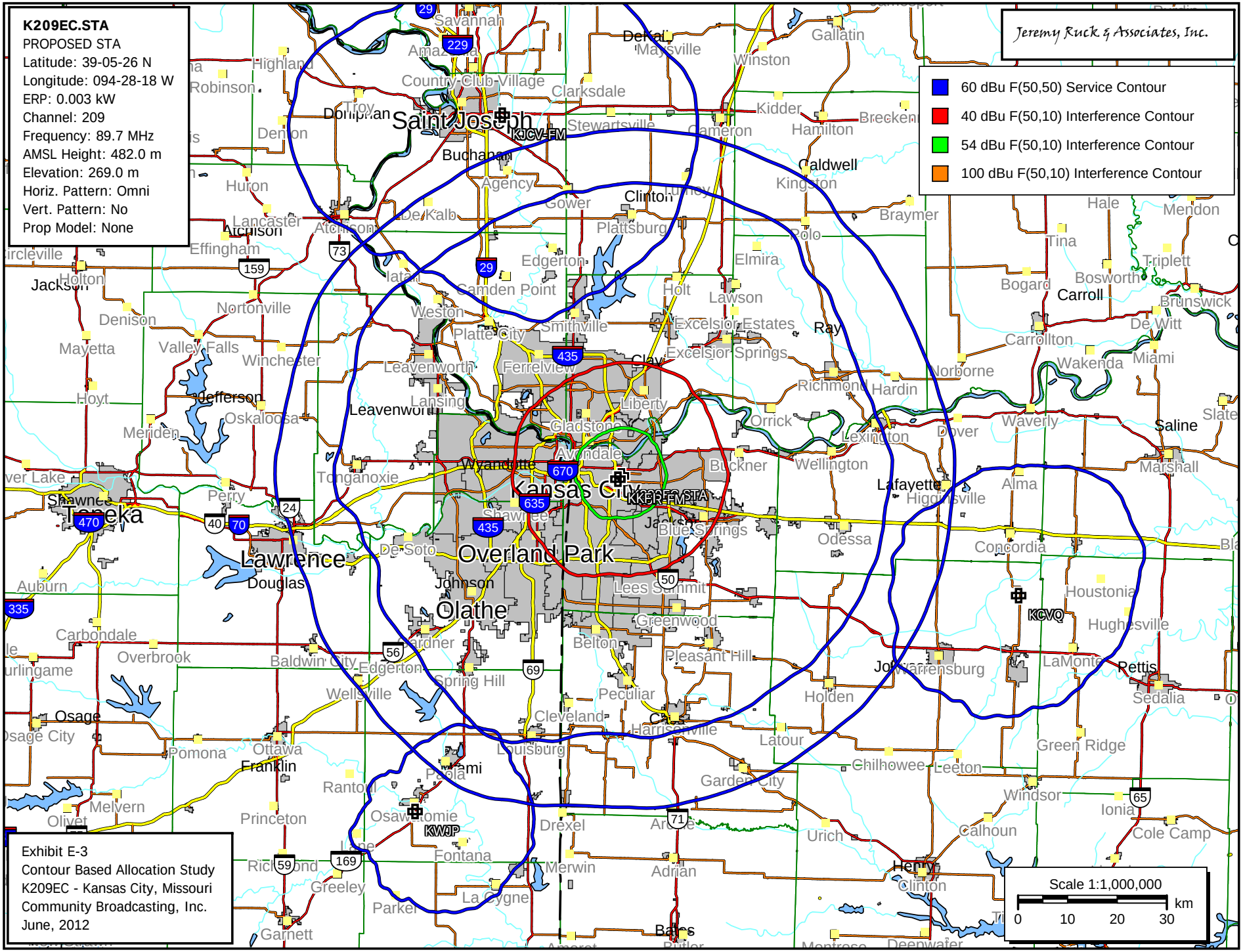
Jeremy Ruck & Associates, Inc.
Consulting Engineers - Canton, Illinois

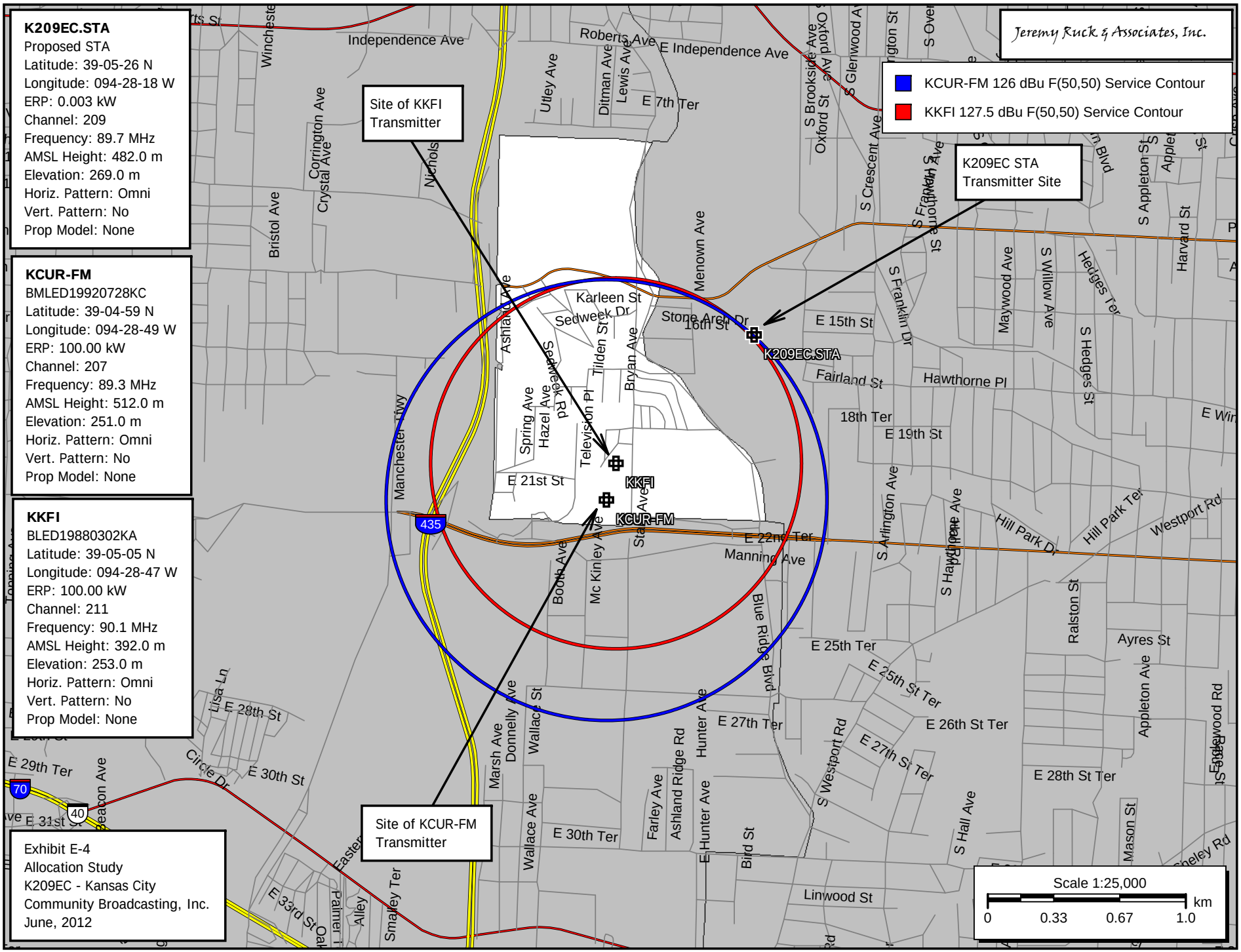
Exhibit E-2 - Tabular Allocation Study
K209EC - Kansas City, Missouri

REFERENCE CH# 209D - 89.7 MHz, Pwr= 0.003 kW DA, HAAT= 224.9 M, COR= 482 M DISPLAY DATES
39 05 26.0 N. Average Protected F(50-50)= 6.27 km DATA 06-13-12
94 28 18.0 W. Standard Directional SEARCH 06-15-12

CH CALL / CITY	TYPE ANT / STATE	AZI <--	DIST / FILE #	LAT / LNG	PWR(kW) INT(km) / HAAT(M) COR(M)	PRO(km) / LICENSEE	*IN* / (Overlap in km)	*OUT*
207C1 KCUR-FM Kansas City	LIC _CN MO	221.7 41.7	1.11 BMLED19920728KC	39 04 59.0 94 28 49.0	100.000 9.4 250 512	69.0 The Curators Of The Univer	-14.4*	-68.0*
211C1 KKFI Kansas City	LIC _CN MO	227.0 47.0	0.95 BLED19880302KA	39 05 05.0 94 28 47.0	100.000 7.0 129 392	57.8 Mid-coast Radio Project, I	-12.1*	-57.0*
209C2 KJCV-FM Country Club	LIC DCX MO	341.8 161.6	76.63 BLED20100707FCN	39 44 42.0 94 45 06.0	25.000 116.4 106 386	41.3 Community Broadcasting, In	-45.7*	13.8
209D K209EC Kansas City	LIC DV_ MO	221.7 41.7	1.11 BLFT20010724ABT	39 04 59.0 94 28 49.0	0.205 30.0 81 343	9.0 Community Broadcasting, In	-35.0*	-29.0*
209C3 KCVQ Knob Noster	LIC _C_ MO	106.9 287.4	83.40 BLED20120202ACI	38 52 10.0 93 32 58.0	7.700 86.4 70 296	26.1 Lake Area Educational Broa	-7.2*	42.6
209A KWJP Paola	LIC DCX KS	211.5 31.2	79.42 BLED20110623ACP	38 28 49.0 94 56 53.0	4.500 67.1 68 349	19.4 Gospel To The Nations Mini	6.4	36.2
209D K209CT St. Joseph	LIC _C_ MO	339.2 159.0	76.67 BLFT19991104ABZ	39 44 05.0 94 47 26.0	0.170 37.4 90 367	10.9 Community Broadcasting, In	33.4	44.9
209A KNBU Baldwin City	LIC _CN KS	241.0 60.6	70.92 BLED19920407KF	38 46 45.0 95 11 15.0	0.100 21.4 36 338	6.4 Baker University	43.5	43.3
06 D 1337131 Columbia	AP __N MO	94.6 276.0	185.46 BNPDVL20091020AAM	38 56 12.0 92 20 02.0	0.300 0.1 58 236	46.6 Live Sports Radio, Inc.	0.0R	185.5M
06 D 1330630 Rolla	AP __N MO	117.3 299.0	265.16 BNPDVL20090825BJS	37 57 54.0 91 47 01.0	0.300 0.1 214 470	46.6 Alma Corporation	0.0R	265.2M
06Z2 616942 Hutchinson	AP _HN KS	250.1 67.7	358.00 BPRM20011009AEG	37 55 43.0 98 18 36.0	0.000 0.1 0	46.6 Sierra Grande Broadcasting	0.0R	358.0M
06 D K06QG-D Sioux City	CP __N IA	339.8 158.7	415.61 BMJADVL20100519AAZ	42 35 12.0 96 13 19.0	0.300 0.1 593 956	46.6 Hispanic Family Christian	0.0R	415.6M

Terrain database is NED 03 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
All separation margins (if shown) include rounding
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
Reference station has protected zone issue: AM tower


K209EC.STA
PROPOSED STA
Latitude: 39-05-26 N
Longitude: 094-28-18 W
ERP: 0.003 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 482.0 m
Elevation: 269.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Jeremy Ruck & Associates, Inc.
60 dBu F(50,50) Service Contour
40 dBu F(50,10) Interference Contour
54 dBu F(50,10) Interference Contour
100 dBu F(50,10) Interference Contour
Saint Joseph
KJCV-FM
Kansas City
KKFR-FM
KKFR-FM STA
Overland Park
Olathe
Lawrence
Topeka
Leavenworth
KCVQ
KWJP
Exhibit E-3
Contour Based Allocation Study
K209EC - Kansas City, Missouri
Community Broadcasting, Inc.
June, 2012
Scale 1:1,000,000
0 10 20 30 km


K209EC.STA
Proposed STA
Latitude: 39-05-26 N
Longitude: 094-28-18 W
ERP: 0.003 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 482.0 m
Elevation: 269.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
KCUR-FM
BMLED19920728KC
Latitude: 39-04-59 N
Longitude: 094-28-49 W
ERP: 100.00 kW
Channel: 207
Frequency: 89.3 MHz
AMSL Height: 512.0 m
Elevation: 251.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
KKFI
BLED19880302KA
Latitude: 39-05-05 N
Longitude: 094-28-47 W
ERP: 100.00 kW
Channel: 211
Frequency: 90.1 MHz
AMSL Height: 392.0 m
Elevation: 253.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Exhibit E-4
Allocation Study
K209EC - Kansas City
Community Broadcasting, Inc.
June, 2012
Jeremy Ruck & Associates, Inc.
KCUR-FM 126 dBu F(50,50) Service Contour
KKFI 127.5 dBu F(50,50) Service Contour
Site of KKFI Transmitter
K209EC STA Transmitter Site
Site of KCUR-FM Transmitter
K209EC.STA
KKFI
KCUR-FM
Scale 1:25,000
0 0.33 0.67 1.0 km
Independence Ave
E Independence Ave
Roberts Ave
Utley Ave
Ditman Ave
Lewis Ave
E 7th Ter
Corrington Ave
Crystal Ave
Bristol Ave
Nichols
Menown Ave
Karleen St
Sedweek Dr
Stone Arch Dr
16th St
E 15th St
Fairland St
Hawthorne Pl
18th Ter
E 19th St
E 21st St
Ashland Ave
Tilden St
Bryan Ave
Television Pl
Spring Ave
Hazel Ave
Seaweek Rd
Manchester Tfwy
435
Booth Ave
Mc Kinley Ave
Stanley Ave
E 22nd Ter
Manning Ave
Blue Ridge Blvd
S Arlington Ave
S Hawthorne Ave
Hill Park Dr
Hill Park Ter
Westport Rd
Ralston St
Ayres St
E 25th Ter
E 25th St Ter
E 26th St Ter
E 27th Ter
E 27th St Ter
E 28th St Ter
S Westport Rd
Appleton Ave
Englewood Rd
S Hall Ave
Mason St
Linwood St
Hunter Ave
E Hunter Ave
Bird St
Ashland Ridge Rd
Farley Ave
Wallace St
Wallace Ave
E 30th Ter
Marsh Ave
Donnelly Ave
Lisa Ln
E 28th St
E 29th Ter
Circle Dr
E 30th St
E 31st St
Beacon Ave
70
40
Smalley Ter
Alley
E 33rd St
S Brookside Ave
Oxford St
S Glenwood Ave
S Crescent Ave
S Franklin Dr
S Willow Ave
Maywood Ave
Hedges Ter
S Hedges St
S Appleton St
Harvard St
Blvd