

EXHIBIT 13
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OVERLAP REQUIREMENTS
Habibi's Broadcasting, LLC.
Little Rock, AR

Figure 13.0 is an allocation study showing the interfering contours for the proposed facilities in relation to the protected contours for all FM broadcast and FM translator stations operating on channels 234 through 240 which require protection consideration. As shown in this figure, the proposed operating facilities provide the contour protection required by Section 74.1204(a) of the FCC Rules to all other stations requiring protection consideration except second adjacent channel stations KHKN(FM) - Maumelle, Arkansas, which operates on Channel 235C, and KSSN(FM) - Little Rock, Arkansas, which operates on Channel 239C. As is documented below in more detail, however, the proposed facilities are not likely to result in any actual interference to KHKN or KSSN. Thus, based on this lack of interference, Section 74.1204(d) of the FCC Rules permits the attached application to be granted in spite of this prohibited contour overlap.

Section 74.1204(a) of the FCC Rules prohibits any overlap between the proposed 100 dBu contour and the 60 dBu protected contours for both KHKN and KSSN. Compliance with this requirement, however, is obviously not possible from this site, since the proposed site is located within the 60 dBu protected contours for both KHKN and KSSN. Figure 13.1 is a map exhibit depicting the predicted 100 dBu contour for the proposed facilities. As shown in this figure, the proposed 100dBu contour extends 1100 meters from the proposed site. This figure also shows that there are buildings and public highways located within this distance of the proposed site. As a result, it was necessary to undertake a more detailed analysis to document that there is no population that is predicted to receive interference within this area of prohibited overlap.

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As part of this detailed analysis, it was determined that the predicted KHKN signal strength at the proposed site is 82.7 dBu, while the predicted KSSN signal strength at the proposed site is 87.2 dBu.¹ Based on the 40 dB undesired to desired (“U/D”) signal strength ratio specified for second adjacent channel stations in Section 74.1204(a)(3) of the FCC Rules, a signal level exceeding 122.7 dBu would be required to cause predicted interference to KHKN and a signal level exceeding 127.2 dBu would be required to cause predicted interference to KSSN. The vertical radiation pattern data for the proposed antenna was utilized in conjunction with free space propagation prediction techniques to calculate the distance to the 122.7 dBu contour² for the proposed facilities at depression angles ranging from 0° down through 90°. The results of these calculations are tabulated in Table 13.2 and depicted in Figure 13.2, which shows a side view of the predicted 122.7 dBu contour for this proposed antenna system. As shown in this figure, the predicted 122.7 dBu contour for these proposed operating facilities never reaches ground level, with its closest approach being 14.1 meters (46 feet) at a depression angle of 60°. Since, as shown in Figure 13.1, there are no tall buildings or other publicly accessible tall structures located near the proposed site, it is obvious that there is no population within the area where this overlap would result in interference being predicted to either KHKN or KSSN. Thus, pursuant to Section 74.1204(d) of the FCC Rules, the attached application can be granted in spite of this prohibited contour overlap, due to the total lack of population within the area of predicted interference. If it is

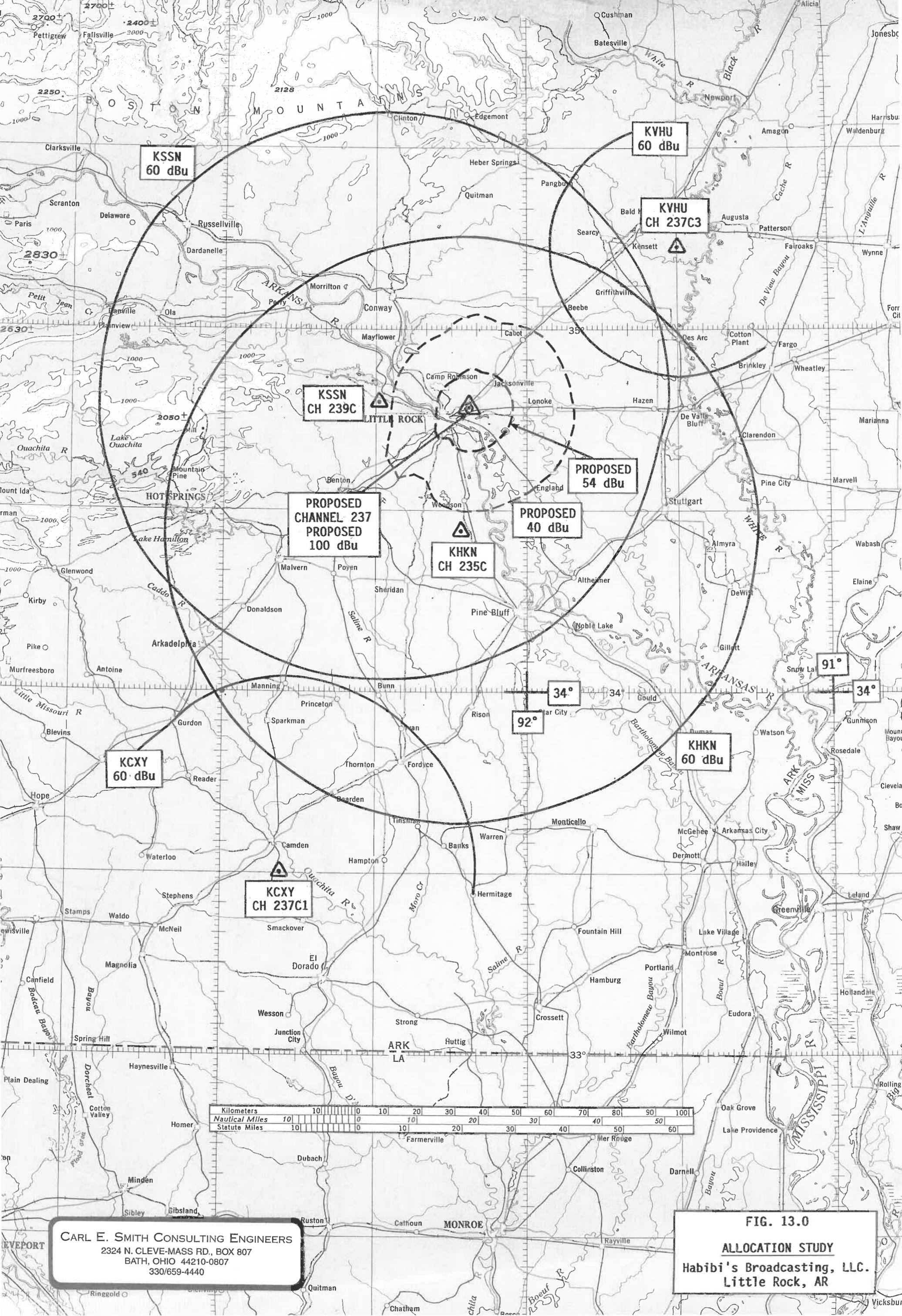
¹These signal strength calculations were made using the F(50,50) curves from Section 73.333 of the FCC Rules and terrain data extracted from the NGDC 30 second terrain database.

²The area where the predicted signal strength exceeds 127.2 dBu will be totally contained within the area where the predicted signal strength exceeds 122.7 dBu.

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deemed to be necessary, a waiver of Section 74.1204(a) of the FCC Rules is respectfully requested with regard to this situation.

Table 13.3 is an FM spacing study which demonstrates that the proposed facilities will comply with the intermediate frequency separation requirements outlined in Section 73.207 of the FCC Rules with regard to all existing or proposed stations operating on FM Channels 290 and 291.



**KSSN
60 dBu**

**KVHU
60 dBu**

**KVHU
CH 237C3**

**KSSN
CH 239C**

**PROPOSED
54 dBu**

**PROPOSED
CHANNEL 237
PROPOSED
100 dBu**

**PROPOSED
40 dBu**

**KHKN
CH 235C**

**KCXY
60 dBu**

34°

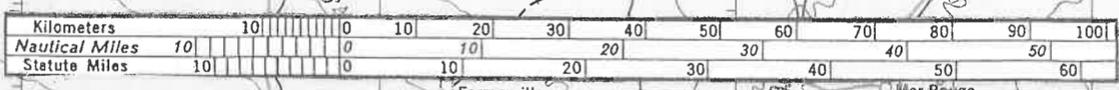
92°

**KHKN
60 dBu**

91°

34°

**KCXY
CH 237C1**



CARL E. SMITH CONSULTING ENGINEERS
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FIG. 13.0
ALLOCATION STUDY
 Habibi's Broadcasting, LLC.
 Little Rock, AR



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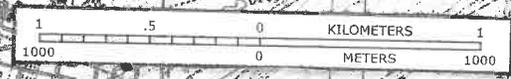


FIG. 13.1
PROPOSED 100 dBu CONTOUR
 Habibi's Broadcasting, LLC.
 Little Rock, AR

TABLE 13.2

PROPOSED 122.7 DBU CONTOUR

Habibi's Broadcasting, LLC.

Little Rock, AR

<u>Depression Angle (Degrees)</u>	<u>Relative Field</u>	<u>ERP (dBk)</u>	<u>122.7 dBu Contour* (Meters)</u>
0	1.000	-6.02	81.3
5	0.960	-6.38	78.0
10	0.850	-7.43	69.1
15	0.675	-9.43	54.9
20	0.450	-12.96	36.6
25	0.225	-18.98	18.3
30	0.010	-46.02	0.8
35	0.190	-20.45	15.4
40	0.340	-15.39	27.6
45	0.450	-12.96	36.6
50	0.500	-12.04	40.6
55	0.525	-11.62	42.7
60	0.510	-11.87	41.4
65	0.470	-12.58	38.2
70	0.410	-13.76	33.3
75	0.350	-15.14	28.4
80	0.275	-17.23	22.4
85	0.200	-20.00	16.3
90	0.140	-23.10	11.4

Horizontal ERP = 250 Watts = -6.02dBk

* - Contour distance calculated using free space calculation techniques.

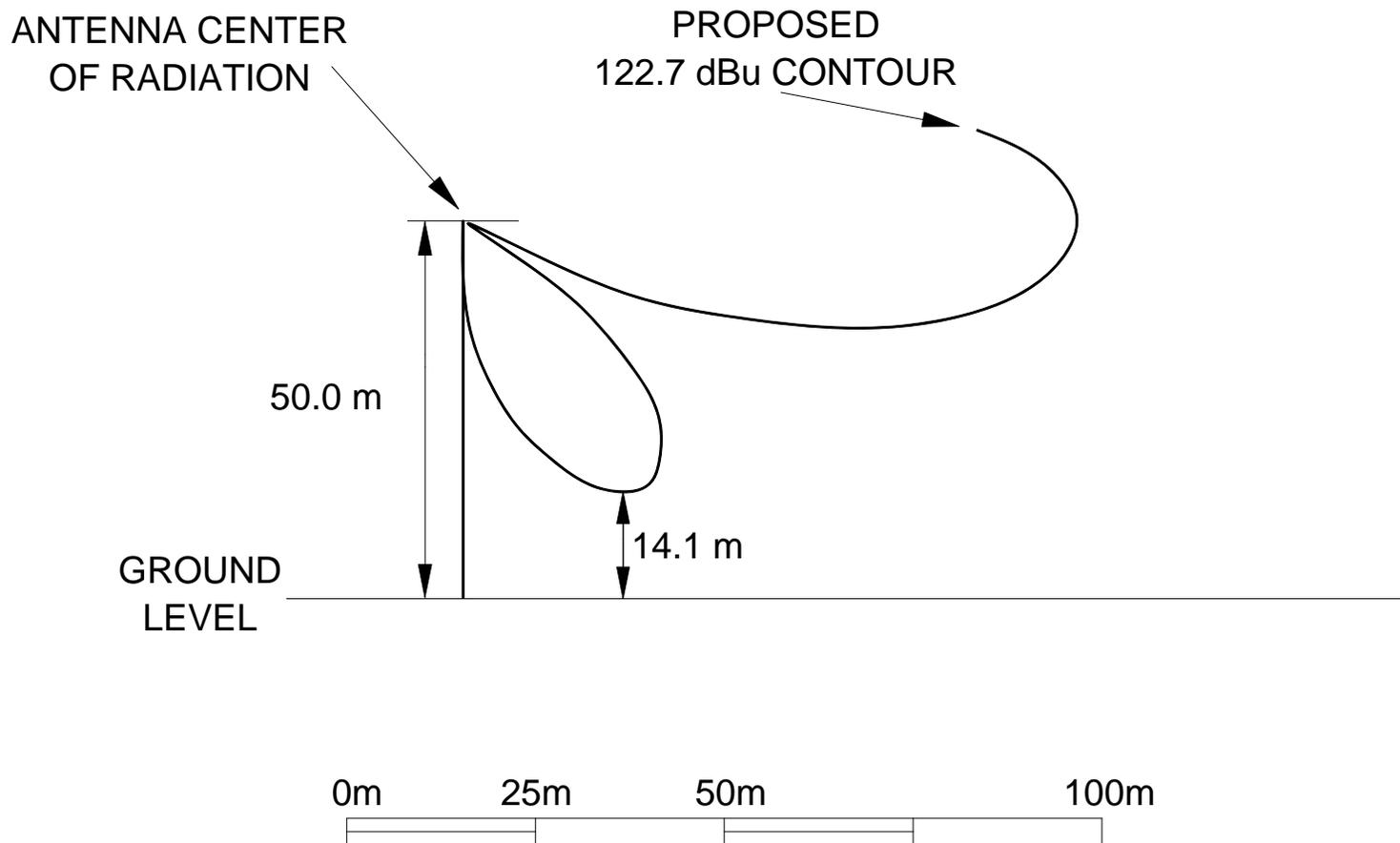


FIG. 13.2

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PROPOSED 122.7 dBu CONTOUR

HABIBI'S BROADCASTING, LLC.
 LITTLE ROCK, AR

TABLE 13.3

FM ALLOCATION STUDY - CHANNEL 237A (95.3 MHz) - LITTLE ROCK, AR

 HABIBI'S BROADCASTING, I.L.C.
 LITTLE ROCK, AR

STUDY COORDINATES: 34/46/58 92/11/27

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING* (km)	NOTES
KLAZ	HOT SPRINGS, AR	290	C1	90.85	22.0	
KFFB	FAIRFIELD BAY, AR	291	C2	105.65	15.0	

* Required Spacing Per Section 73.207 of The FCC Rules

Notes:

- | | |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application |
| 2 - Construction Permit | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed | 9 - Proposed Rulemaking |
| 4 - Move From This Channel Ordered | 10 - Rulemaking Petition |
| 5 - Move to This Channel Ordered | 11 - Short-Spaced |
| 6 - One Step Reference Site | 12 - Vacant Allotment |