

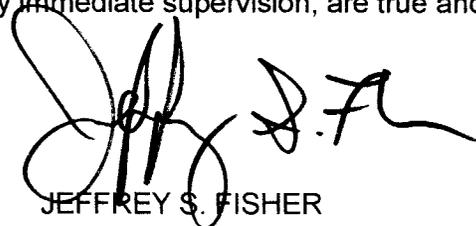
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FORT SMITH 46, INC., licensee of low power television station K64FO, Channel 64 in Fayetteville, Arkansas, in support of this Application for Construction Permit to specify operation on Channel 48 from a new site. This proposal is being submitted in response to the Commission's reclamation of Channel 64 spectrum for future use as a public safety channel, thereby placing this translator in a displacement situation.

It is proposed to mount a standard MCI directional antenna on the side of an existing 118-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 74 dBu contour encompasses a significant portion of that which obtains from the licensed K64FO facility. Operating parameters for the proposed facility are tabulated in Exhibit C. A contour overlap analysis and interference study are provided in Exhibit D, and a power density calculation follows as Exhibit E.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1040585 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



JEFFREY S. FISHER

March 8, 2004

CONTOUR POPULATIONS
GRADE A : 112,252
GRADE B : 194,063

Smith and Fisher

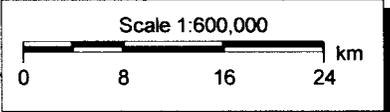
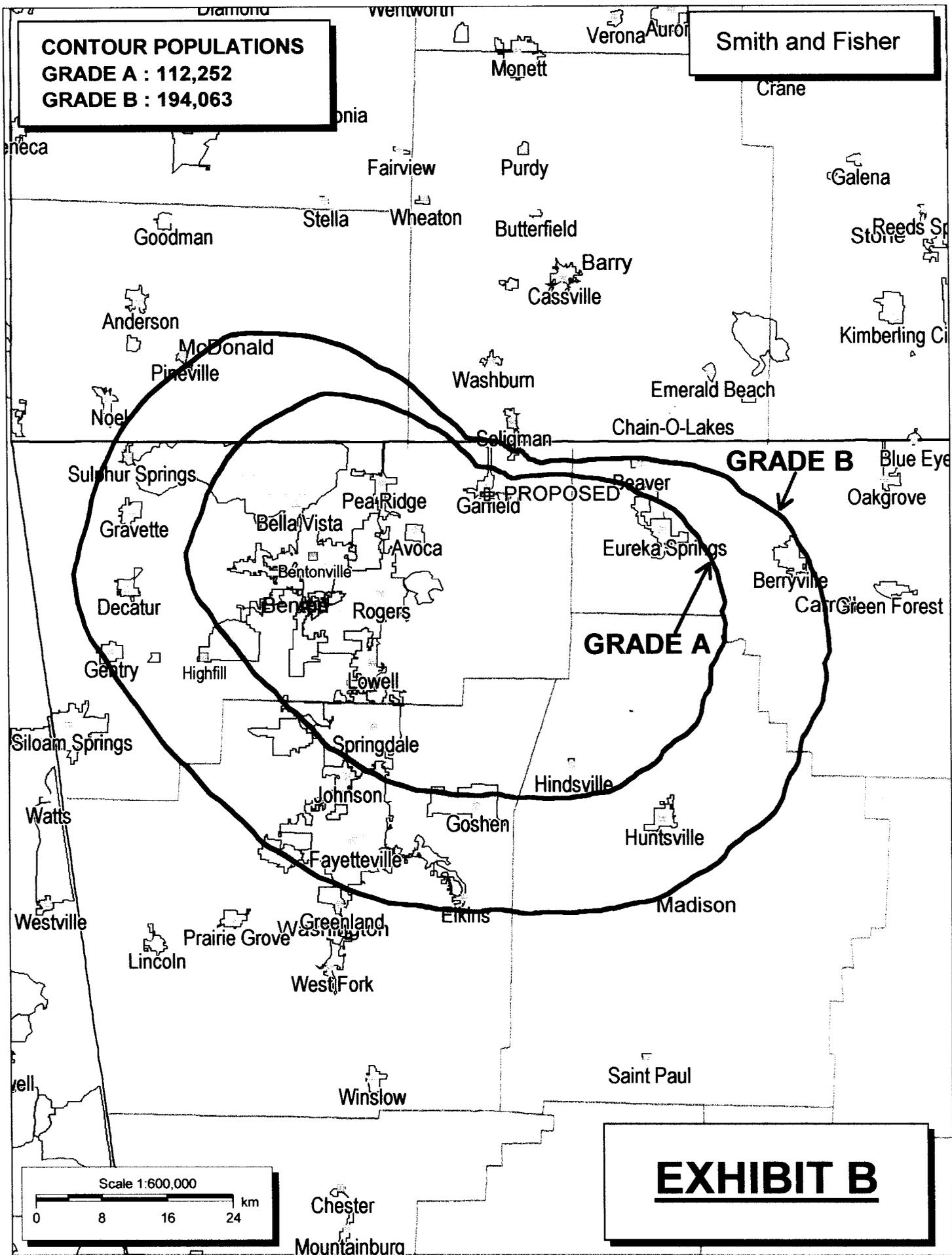


EXHIBIT B

PROPOSED OPERATING PARAMETERS

PROPOSED K64FO
CHANNEL 48 – FAYETTEVILLE, ARKANSAS

Transmitter Power Output:	4.2 kw
Transmission Line Efficiency:	67.4%
Antenna Power Gain – Toward Horizon:	53.2
Antenna Power Gain – Main Lobe:	53.2
Effective Radiated Power – Toward Horizon:	150 kw
Effective Radiated Power – Main Lobe:	150 kw
Transmitter Make and Model:	Type-accepted
Rated Output	5.0 kw
Transmission Line Make and Model:	Andrew HJ7-50A
Size and Type:	1-5/8" air heliax
Length:	304 feet
Antenna Make and Model:	MCI 955316
Orientation	220 degrees
Beam Tilt	0.5 degrees
Effective Height Above Ground:	85.1 meters
Effective Height Above Mean Sea Level:	593 meters

CONTOUR OVERLAP AND
LONGLY-RICE INTERFERENCE STUDIES
PROPOSED K64FO
CHANNEL 48 – FAYETTEVILLE, ARKANSAS

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D-2. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except in six stations: KWHB-DT (STA), Channel 48, Tulsa, Oklahoma; K48FL (Lic., CPM), Channel 48, Ft. Smith, Arkansas; KWBS-TV (Lic., CP), Channel 34, Eureka Springs, Arkansas; KELF-LP (CPM), Channel 48, Grove, Oklahoma; KFAA (Lic., Appl.), Channel 51, Rogers, Arkansas; and, K27FF (Appl.), Channel 48, Little Rock, Arkansas.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within each station's protected contour where interference from another source (other than Fort Smith's proposed K64FO) already is predicted to exist (also known as "masking"). The results of these

EXHIBIT D-1

studies are provided in Exhibit D-3. It concludes that the facility proposed herein causes no new interference to any of the above stations.

As a result, a waiver of Section 74.705 of the Commission's Rules with respect to interference to KFFA(TV) and KWBS-TV, and Section 74.706 with respect to interference to KWHB-DT, and Section 74.707 with respect to interference to K48FL, KELF-LP, and K27FF are requested and believed to be justified based on the aforementioned Longley-Rice studies.

SMITH AND FISHER

EXHIBIT D-2

PROPOSED K64FO
FAYETTEVILLE - AR

REFERENCE

36 26 30 N
93 58 25 W

LPTV Pwr = 150 kW, HAMS L COR= 613 M

DISPLAY DATES

DATA 02-28-04
SEARCH 03-05-04

..... Channel 48Z, 674 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin
KWHB-D*ST	48	Tulsa	OK 177.46	255.8	> 318.30	-136.69
K48FL* LI	48Z	Fort Smith	AR 115.85	197.8	> 224.56	-108.71
KWBSTV*CP	34+	Eureka Springs	AR 0.00	0.0	> 074.11	-72.89
KWBSTV*LI	34+	Eureka Springs	AR 0.00	0.0	> 061.07	-60.02
KELF-L*CPM	48+	Grove	OK 74.93	290.1	> 105.26	-30.33
KFAA AP	51-	Rogers	AR 3.58	151.7	> 032.00	-28.42
K48FL* CPM	48-	Fort Smith	AR 114.23	221.5	> 149.27	-15.07
KFAA LI	51-	Rogers	AR 28.74	203.5	> 032.00	-3.26
K27FF* AP	48Z	Little Rock	AR 225.92	143.5	> 262.09	-0.91
NEW* AP	48Z	Mcalister	OK 226.48	224.5	> 223.35	3.13
KSPR* LI	33-	Springfield	MO 125.68	46.2	> 111.17	19.84
NEW AP	48Z	Mcalister	OK 226.48	224.5	> 199.01	27.47
K33FG LI	33Z	Siloam Springs	AR 58.32	236.6	> 028.59	29.73
AL8612 AL	45+	Grove	OK 73.44	283.5	> 032.00	41.44
KJPX-L LI	47-	Joplin	MO 77.29	331.6	> 035.19	42.10
AL400 AL	48+	Hugo	OK 303.72	207.7	> 254.45	49.27
KWHB CP	47Z	Tulsa	OK 159.97	253.5	> 108.35	51.62
KWHB LI	47Z	Tulsa	OK 159.97	253.5	> 097.02	62.95

* Actual radials antenna height and directional patterns used (if any)

INTERFERENCE SUMMARY
 PROPOSED K64FO
 CHANNEL 48 – FAYETTEVILLE, ARKANSAS

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
KWHB-DT BDSTA-20030113ACX	STA	Tulsa, OK	48	622,975	805	0.1
K48FL BLTTL-19960723IV	Lic.	Fort Smith, AR	48	72,253	0	0
KWBS-TV BPCT-20010927AAQ	CP	Eureka Springs, AR	34	312,226	0	0
KWBS-TV BLCT-20000616AGN	Lic.	Eureka Springs, AR	34	242,476	0	0
KELF-LP BMPTTL-20020805AAV	CPM	Grove, OK	48	11,774	23	0.2
KFAA (LP) BPCT-20040121ADD	Appl.	Rogers, AR	51	236,013	0	0
K48FL BMPTTL-20030611AAW	CPM	Fort Smith, AR	48	21,605	64	0.3
KFAA (LP) BLCT-19921005KH	Lic.	Rogers, AR	51	222,838	91	<0.1
K27FF BPTTL-20020814ABF	Appl.	Little Rock, AR	48	339,328	0	0