

ENGINEERING REPORT

FM Translator “Long Form” Filing for Original Construction Permit Application

NEW246D – Las Cruces, NM

File No. BNPFT-20030317KWJ

Facility ID No. 148434

Long-Form Filing pursuant to
DA 13-283 (AUC-03-83-D)
“Auction 83 Singleton”

March 2013

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- Exhibit 17.1 – RF Radiation Study

(Exhibit numbering is in response to FCC Online Form 349, Section III-A)

DISCUSSION OF REPORT

On March 17, 2003 Family Life Broadcasting System ("FLBS"), submitted BNPFT-20030317KWJ application for a new FM Translator in Las Cruces, New Mexico. Pursuant to Public Notice DA 13-233 (Report Number AUC-03-83-D) and its Attachment B, FLBS now files its "Long Form" application. The original "Short-Form" application specified operation on CH246D (97.1 MHz.) with 0.050 kW of non-directional power at an antenna at 1,234 meters Center of Radiation Above Mean Seal Level ("CORAMSL"). This "Long-Form" filing proposes to amend only its CORAMSL 9 meters below the original CORAMSL height onto the same tower at the same frequency and power as originally applied in its Short-Form application. The proposed FM operating specifications are listed in **Exhibit 12.1**. The Antenna Structure Registration is shown in **Exhibit 12.2**. A comparison of both the Short-Form and Long-Form 60 dBu contours is shown in **Exhibit 12.3**.

Pursuant to Public Notice DA 13-283, this "Long-Form" application proposes parameters more than 39 km from any Appendix A Market Grid. Therefore submittal of a supplemental LPFM Grid Test Showings is not required. Additional, the site is not located within any "out-of-grid" Top-50 Spectrum Limited Market Boundaries. Therefore, no supplemental Top-50 transmitter site test showings are required.

The Tabulation of Allocations as of March 7, 2013 is shown in **Exhibit 13.1**. It shows that the translator proposed in this Long-Form application will not give interference to any existing FM broadcast station, facility or application. There are three (3) facilities, existing or proposed, close enough to warrant additional studies. Contour protection studies have been provided showing the lack of given interference to KBNA-FM, El Paso, Texas (**Exhibit 13.2a & 13.2b**), Application Number 1543236 CH 246D application for Anthony, New Mexico (**Exhibit 13.3**) as well as Mexican Allocation Facility ID Number 94398, in Las Paloma, CH (**Exhibit 13.4**).

On March 11, 2013 Your Christian Companion Network, Inc. ("YCCN") submitted an Auction 83 Singleton Long-Form application BNPFT-20130311ACN for CH 244D that created a new second adjacent channel conflict with our Auction 83 Short-Form Tech Box Proposal BNPFT-20030317KWJ for CH246D. This conflict was prohibited by Public Notice DA 13-283, which clearly states that the Form 349 Long-Form application "may not create a new conflict to any pending Auction 83 tech box proposal." On March 20, 2013, FLBS submitted a Motion to Dismiss the YCCN application, believing YCCN's BNPFT-20130311ACN was subject to immediate dismissal to remove the prohibited second adjacent channel conflict. However, on March 21, 2013 YCCN amended its application to remove the conflict. FLBS then requested dismissal of its Motion to Dismiss, contingent upon acceptance of the YCCN March 21 amendment.

The 60-dBu Service Contour of the proposed Translator lies totally outside of the Primary Station KFLQ(FM) as shown in **Exhibit 13.5**. The Translator will rebroadcast KFLQ(FM) off-the-air through a FLBS FM Translator.

The proposed Translator is 60.6 km from the international border of Mexico. Compliance with the Agreement Between the Government of the United States of America and the Government of the United Mexican States Relating to the FM Broadcast Service in the Band 88-108 for "Low Power FM Stations" is shown in **Exhibit 13.6**.

Since the TV Channel 6 protection provisions of CFR §73.525 apply only to facilities on Channels 200-220, and this Long-Form Application pertains to an FM Translator facility on Channel 246, no TV Channel 6 protection is warranted.

The proposed FM Translator facility will not produce human exposure to radiofrequency radiation in excess of the safety standards specified in §1.1307(b)(3) of the Commission's rules concerning RF contributors of less than 5% as shown in **Exhibit 17.1**.

In the event work would be required in proximity to the antenna so that the person(s) working in the area would be potentially exposed to fields in excess of the guidelines set forth in OET Bulletin No. 65 (Edition 97-01), the transmitter power will be reduced or the station will cease operation during the critical period.

The following tabulation of the distances to the proposed 60-dBu service contours results from calculations performed in accordance with CFR §73.313(d) utilize the USGS 03 second terrain database.

N. Lat. = 39-19-47.0 W. Long. = 106-46-51.0		
HAAT and Distance to Contour = FCC Method - USGS 03 SEC		
Bearing (deg)	Distance (km)	HAAT (m)
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0.0	4.71	-143.2
45.0	4.71	-108.8
90.0	4.71	-160.7
135.0	4.71	-33.9
180.0	5.45	40.0
225.0	4.71	-8.0
270.0	4.71	-58.4
315.0	4.71	-6.1
Average HAAT for radials shown: -59.9 meters		

The USGS 03 second terrain database was utilized for all allocation, contour and HAAT calculations contained in this Application.