

**ORIGINAL  
FILE**

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June 12, 1992

**RECEIVED**

**JUN 12 1992**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: MM Docket No. 92-107  
Bible Broadcasting Network, Inc.  
File No. BPED-900816MA  
Fort Smith, Arkansas

Dear Ms. Searcy:

Transmitted herewith, on behalf of Bible Broadcasting Network, Inc. ("BBN"), applicant for a construction permit for a new noncommercial educational FM station at Fort Smith, Arkansas, are an original and two copies of an amendment to the above-referenced application.

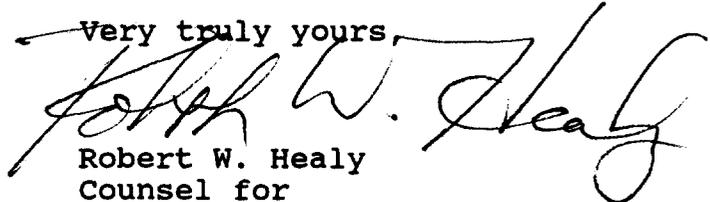
This amendment is submitted pursuant to the Post-Designation Amendment Rules and is subject to the Order of the Presiding Administrative Law Judge authorizing the processing of this amendment.

Also being filed separately is a "Motion to Request Suspension of Procedural Dates".

Simultaneously, BBN and National Christian Network, Inc. ("NCN") are also filing a "Joint Petition for Leave to Amend and for Approval of Joint Settlement Agreement"

If there are any questions with respect to this matter, please communicate with the undersigned.

Very truly yours,



Robert W. Healy  
Counsel for  
BIBLE BROADCASTING NETWORK, INC.

GSS/pn.A0612  
Enc.

cc: As per Certificate of Service  
Bible Broadcasting Network, Inc.

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Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

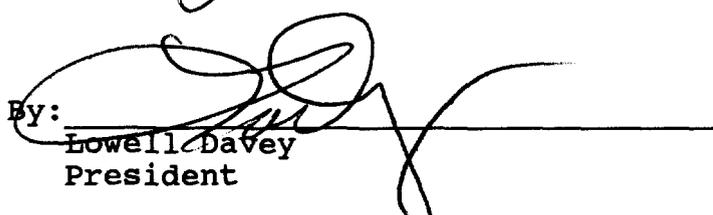
In re Application of )  
BIBLE BROADCASTING NETWORK, INC. ) File No. BPED-900816MA  
For Construction Permit for a New )  
Noncommercial Educational FM )  
Station on Channel 209A, )  
Fort Smith, Arkansas )

**AMENDMENT**

Bible Broadcasting Network, Inc. ("Broadcasting"), applicant for a construction permit for a new noncommercial educational FM station at Fort Smith, Arkansas (File No. BPED-900816MA), hereby amends its above-captioned application by submission of the attached engineering data. This engineering data is submitted pursuant to a Joint Petition for Leave to Amend filed with National Christian Network, Inc. in order to resolve this proceeding.

Executed this 11, day of June, 1992.

**BIBLE BROADCASTING NETWORK, INC.**

By:   
Lowell Davey  
President

**CERTIFICATE OF SERVICE**

I, Michelle M. Lamarre, a legal assistant in the law firm of Smithwick, & Belendiuk, P.C., certify that on this 12th day of June 1992, copies of the foregoing were mailed, postage prepaid, to the following:

Hon. Walter C. Miller\*  
Administrative Law Judge  
FCC, Rm 213  
2000 L Street, N.W.  
Washington, DC 20554

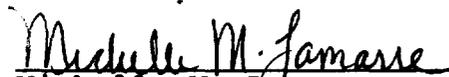
Paulette Laden, Esquire  
Hearing Branch, Enforcement  
Division Mass Media Bureau  
FCC, 2025 M St., NW.  
Suite 7212  
Washington, DC 20554

Chief, Data Management Staff\*  
Audio Services Division  
Mass Media Bureau, FCC  
1919 M St., N.W. Rm 350  
Washington, DC 20554

Chief, Audio Services  
Division\*  
Mass Media Bureau, FCC  
1919 M St., N.W., Rm 302  
Washington, DC 20554

Raymond A. Kassis  
President  
National Christian  
Network, Inc.  
1150 W. King Street  
Cocoa, FL 32922

\*By hand

  
Michelle M. Lamarre

# EXHIBIT E-5A



**SITE**

FREQ INFO ON ATIS

WIZER  
233 FS 12.8

NOTE: That portion of the TRSA overlying R-2401 and R-2402 is not effective when these areas are active.

E. HAROLD MUNN, JR.  
& ASSOCIATES, INC.  
Broadcast Engineering Consultants  
Coldwater, Michigan

RAPIDLY RISING TERRAIN  
USE CAUTION DURING PERIOD  
OF LOW CEILING AND VISIBILITY

**MEMPHIS**  
SECTIONAL AERONAUTICAL CHART  
SCALE 1:500,000

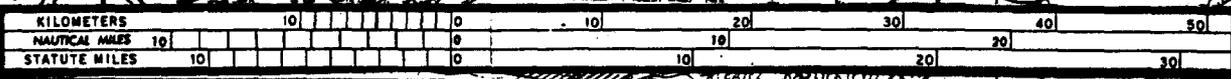


EXHIBIT E-6

06-02-1992

E. H. MUNN JR. &amp; ASSOC.

517-2787339

CH# 209A - 89.7 MHz  
FORT SMITH AR AMENDMENT

INTERFERENCE CHECKS WITH NEW, FORT SMITH, AR at N. LAT. 35 26 51 W. LNG. 94 21 54

PWR = .8 kW H.A.A.T. = 118 M C.O.R. = 278 M AMSL

Protected F(50-50) 60 dBu = 18.76 km

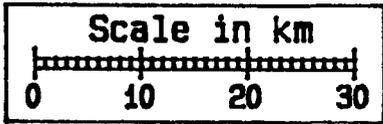
F(50-10) 40 dBu = 60.7 54 dBu = 28.68 80 dBu = 5.99 100 dBu = 1.61

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY		STATE	LICENSEE		(---		LNG.	HAAT(M)	COR(M)	FILE #
207C2	AP207	AP CN	20.4	4.2	34.3	54.51 km	35 51 12	4.50	15.37	44.35
Fayetteville		AR	National Christian Network		214.3	33.87 Mi	94 1 33	324.0	866	BPED900823MA
208C1	KW6S	LI CN	17.8	38.7	298.2	134.55 km	36 1 15	50.00	97.98	67.19
Tulsa		OK	The University of Tulsa		118.2	83.61 Mi	95 40 32	325.0	519	BLED860707KG
209A	AP209	AP CN	-82.2	-80.5	0.0	0.00 km	35 26 51	1.00	63.44	19.84
Fort Smith		AR	Bible Broadcasting Network		180.0	0.00 Mi	94 21 54	118.0	278	BPED900816MA
210C	KRPS	LI CN	86.2	109.5	348.9	210.84 km	37 18 44	100.00	105.86	72.68
Pittsburg		KS	Pittsburg State University		168.9	131.01 Mi	94 48 58	305.0	579	BLED880518KC
211A	AP211	AP CN	42.8	45.1	7.0	66.23 km	36 2 24	3.00	4.72	15.14
Fayetteville		AR	Mission Boulevard Christia		187.0	41.15 Mi	94 16 33	39.0	427	BPED910123MF
i.f. RELATIONSHIPS:										
262A	KHJM	LI CN	10.0 R	96.0 M	290.1	105.98 km	35 46 31	3.00	6.20	19.55
Taft		OK	Taft Broadcasting, Inc.		110.1	65.85 Mi	95 27 49	67.0	247	BLH900223KA

- Nearest CH 6 Grade B =KOTV at 8.1 km

The map exhibit included shows the clearance between the proposed Channel 209A at Fort Smith, AR., and the proposed use of Channel 207C2 at Fayetteville, AR, BPED-900823MA, as AMENDED.

It is believed that no additional map studies are required in this allocation.



✱ SPRINGDALE  
INTERCHK

✱ FAYETTEVILLE

✱ MUSKOGEE

+ AP207

80 dBu

60 dBu

+ AP209

80dBu

60dBu

AP207 207C2 - 4.5kW

AP209 - BPED900816MA

209A - .8kW

Predicted Signal Contours:

35 26 51 - PROPOSED FORT SMITH AR  
94 21 54 - FM SERVICE

ERP = .8 kW, -.969 dBk      FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	60 dBu.5	54 dBu.1
0 Degr.	42.4M	0.800	-0.969	1.000	11.3	16.2
45 Degr.	93.2M	0.800	-0.969	1.000	16.8	25.0
90 Degr.	138.1M	0.800	-0.969	1.000	20.6	30.4
135 Degr.	155.9M	0.800	-0.969	1.000	21.9	32.4
180 Degr.	136.3M	0.800	-0.969	1.000	20.5	30.2
225 Degr.	154.0M	0.800	-0.969	1.000	21.7	32.2
270 Degr.	104.2M	0.800	-0.969	1.000	17.9	26.5
315 Degr.	117.5M	0.800	-0.969	1.000	19.1	28.1

-----

Ave. HAAT= 117.7M,      Ant. COR= 278.0M AMSL

EXHIBIT E-6

LICENSED KWGS, Tulsa, Oklahoma CALCULATED CONTOURS

KWGS.60

Page no. 4 of 4

DISTANCES TO CONTOURS (Kilometers):

Frequency: 89.5000 MHz

F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 60.0
78.0	350	17.00	69.0
88.0	347	17.00	68.7
98.0	343	17.00	68.5
108.0	339	17.00	68.2
118.0	339	17.00	68.2
128.0	333	17.00	67.7
138.0	329	17.00	67.5
148.0	323	17.00	67.0
158.0	327	17.00	67.3

DISTANCES TO CONTOURS (Kilometers):

Frequency: 89.5000 MHz

F(50,10) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 54.0
78.0	350	17.00	101.0
88.0	347	17.00	100.7
98.0	343	17.00	100.2
108.0	339	17.00	99.8
118.0	339	17.00	99.8
128.0	333	17.00	99.1
138.0	329	17.00	98.6
148.0	323	17.00	98.0
158.0	327	17.00	98.4

EXHIBIT E-7

STUDY CONCERNING THE POTENTIAL INTERFERENCE TO CHANNEL 6 TELEVISION

The proposed transmitter site for the Fort Smith, AR., Channel 209(A) is located within the 196 km affected radius of two Channel 6 television stations. Those stations are KOTV, Tulsa, OK., and KEMV, Mountain View, AR. Therefore, in accordance with the provisions of Section 73.525 of the Rules, a study has been made of the potential for interference to the reception of KOTV and KEMV.

Calculations were done in accordance with section 73.525(e), and there is contour overlap between the proposed FM station and only one of the Channel 6 facilities. That TV station is KOTV. The interference area has been plotted on the map included in this exhibit. The population affected was determined as specified in the Rules. A total of 723 persons reside in the interference area.

An exemption of the total number of persons affected is claimed, under the provisions of Section 73.525(e)(3)(iii). The entire area of theoretical interference to Channel 6 is within the 74 dBu (city grade) contour of KFSM-TV, Channel 5, Fort Smith, AR. This contour is also shown on the map portions of this exhibit.

The provisions of this section apply because the entire area of interference is located outside the affected TV Channel 6 station's Area of Dominant Influence (ADI), outside the Grade A field strength contour of the Channel 6 station, and within the predicted city grade contour of a TV Broadcast Station whose only network affiliation is the same as the network affiliation of the affected Channel 6 station.

The respective network affiliations are CBS, and the station providing the city grade service to the affected area is KFSM-TV, Channel 5, Fort Smith, Arkansas. Thus, the total number of persons affected may be subtracted, leaving a 0 balance.

The fm to tv U/D ratio has been determined by reference to 47 C.F.R. Section 73.599, Figure 1. This ratio is tabulated in this section. In accordance with the provisions of Section 73.525(e)(1)(iii) an adjustment has been made for television reception antenna directivity.

## Predicted Signal Contours:

35 26 51 - DETAIL STUDY PROPOSED CH.209  
 94 21 54 - FORT SMITH AR TO KOTV

ERP = .8 kW, -.969 dBk		FM - 2-6 Tables			
Radial	HAAT	kW	dBk	Field	73.3 dBu.1
270 Degr.	104.2M	0.800	-0.969	1.000	8.2
272 Degr.	98.0M	0.800	-0.969	1.000	8.0
274 Degr.	91.7M	0.800	-0.969	1.000	7.7
276 Degr.	84.9M	0.800	-0.969	1.000	7.4
278 Degr.	82.1M	0.800	-0.969	1.000	7.3
280 Degr.	78.1M	0.800	-0.969	1.000	7.1
282 Degr.	70.2M	0.800	-0.969	1.000	6.7
284 Degr.	64.6M	0.800	-0.969	1.000	6.4
286 Degr.	64.9M	0.800	-0.969	1.000	6.5
288 Degr.	69.4M	0.800	-0.969	1.000	6.7
290 Degr.	70.8M	0.800	-0.969	1.000	6.7
292 Degr.	71.7M	0.800	-0.969	1.000	6.8
294 Degr.	73.6M	0.800	-0.969	1.000	6.9
296 Degr.	74.4M	0.800	-0.969	1.000	6.9
298 Degr.	76.6M	0.800	-0.969	1.000	7.0
300 Degr.	81.7M	0.800	-0.969	1.000	7.2
302 Degr.	92.3M	0.800	-0.969	1.000	7.7
304 Degr.	105.7M	0.800	-0.969	1.000	8.3
306 Degr.	113.8M	0.800	-0.969	1.000	8.6
308 Degr.	119.1M	0.800	-0.969	1.000	8.8
310 Degr.	124.4M	0.800	-0.969	1.000	9.0
312 Degr.	125.1M	0.800	-0.969	1.000	9.0
314 Degr.	120.8M	0.800	-0.969	1.000	8.9
316 Degr.	113.9M	0.800	-0.969	1.000	8.6
318 Degr.	107.5M	0.800	-0.969	1.000	8.4
320 Degr.	102.9M	0.800	-0.969	1.000	8.2
322 Degr.	98.7M	0.800	-0.969	1.000	8.0
324 Degr.	94.8M	0.800	-0.969	1.000	7.8
326 Degr.	90.4M	0.800	-0.969	1.000	7.6
328 Degr.	84.3M	0.800	-0.969	1.000	7.4
330 Degr.	81.0M	0.800	-0.969	1.000	7.2
332 Degr.	79.9M	0.800	-0.969	1.000	7.2
334 Degr.	74.9M	0.800	-0.969	1.000	6.9
336 Degr.	65.7M	0.800	-0.969	1.000	6.5
338 Degr.	59.3M	0.800	-0.969	1.000	6.2
340 Degr.	56.0M	0.800	-0.969	1.000	6.0
342 Degr.	51.1M	0.800	-0.969	1.000	5.8
344 Degr.	49.1M	0.800	-0.969	1.000	5.7
346 Degr.	50.4M	0.800	-0.969	1.000	5.7
348 Degr.	53.3M	0.800	-0.969	1.000	5.9
350 Degr.	52.6M	0.800	-0.969	1.000	5.9
352 Degr.	46.8M	0.800	-0.969	1.000	5.5
354 Degr.	44.6M	0.800	-0.969	1.000	5.4
356 Degr.	41.7M	0.800	-0.969	1.000	5.2
358 Degr.	42.4M	0.800	-0.969	1.000	5.2

Ave. HAAT= 80.0M, Ant. COR= 278.0M AMSL

FACILITIES STUDIED FOR 47 C.F.R. 73.525 COMPLIANCE


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TULSA	OK	KOTV	Ch. 06+
100 kW	573 M, 1880'	HAAT	
36 1 15	95 40 32		LIC CY
KOTV, INC.		BLCT841031K	
Bearing= 298.2 °	118.2 °	Distance= 134.55 km.,	83.61 Mi.
Grade A (68 dBu)=	71.31 km.,	44.31945 Mi.	
Grade B (47 dBu)=	126.45 km.,	78.58919 Mi.	

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MOUNTAIN VIEW	AR	KEMV	Ch. 06-
100 kW	424 M, 1391'	HAAT	
35 48 47	92 17 24		LIC HN
ARKANSAS EDUCATIONAL TV CO		BLET800903K	
Bearing= 77.8 °	257.8 °	Distance= 192.29 km.,	119.48 Mi.
Grade A (68 dBu)=	62.09 km.,	38.58919 Mi.	
Grade B (47 dBu)=	113.49 km.,	70.53449 Mi.	

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73.599 Figure 1 U/D Ratio

FM Channel= 209  
 Cutoff Distance= 196 km  
 Maximum collocated power at < .4 km = 17.8 kW  
 TV Contour= 47 dB  
 U/D= 20.3 dB  
 Total= 67.3 dB - Directional total= 73.3 dB

TABULATION OF CONTOURS EMPLOYED IN CHANNEL 6 EXHIBIT

Predicted Signal Contours:

35 26 51 - FORT SMITH AR  
 94 21 54 - TV 6 INTERFERENCE CONTOUR

ERP = .8 kW, -.969 dBk      FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	73.3 dBu.1
0 Degr.	42.4M	0.800	-0.969	1.000	5.2
45 Degr.	93.2M	0.800	-0.969	1.000	7.8
90 Degr.	138.1M	0.800	-0.969	1.000	9.5
135 Degr.	155.9M	0.800	-0.969	1.000	10.1
180 Degr.	136.3M	0.800	-0.969	1.000	9.4
225 Degr.	154.0M	0.800	-0.969	1.000	10.1
270 Degr.	104.2M	0.800	-0.969	1.000	8.2
315 Degr.	117.5M	0.800	-0.969	1.000	8.8

Ave. HAAT= 117.7M,      Ant. COR= 278.0M AMSL

KOTV

KOTV Grade "B" CONTOUR

DISTANCES TO CONTOURS (Kilometers):

Frequency:      83.2600 MHz

F(50,50) Curves      Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 47.0
78.0	596	20.00	127.8
88.0	593	20.00	127.6
98.0	589	20.00	127.3
108.0	585	20.00	127.0
118.0	585	20.00	127.0
128.0	579	20.00	126.6
138.0	575	20.00	126.3
148.0	569	20.00	125.9
158.0	573	20.00	126.2

TABULATION OF CONTOURS EMPLOYED IN CHANNEL 6 EXHIBIT

KFSM.74

KFSM City Grade Study Page no.

DISTANCES TO CONTOURS (Kilometers):

Frequency: 77.2500 MHz

F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 74.0
.0	315	20.00	42.8
45.0	303	20.00	42.0
90.0	382	20.00	46.6
135.0	438	20.00	49.7
180.0	448	20.00	50.2
225.0	453	20.00	50.5
270.0	383	20.00	46.7
315.0	354	20.00	45.1

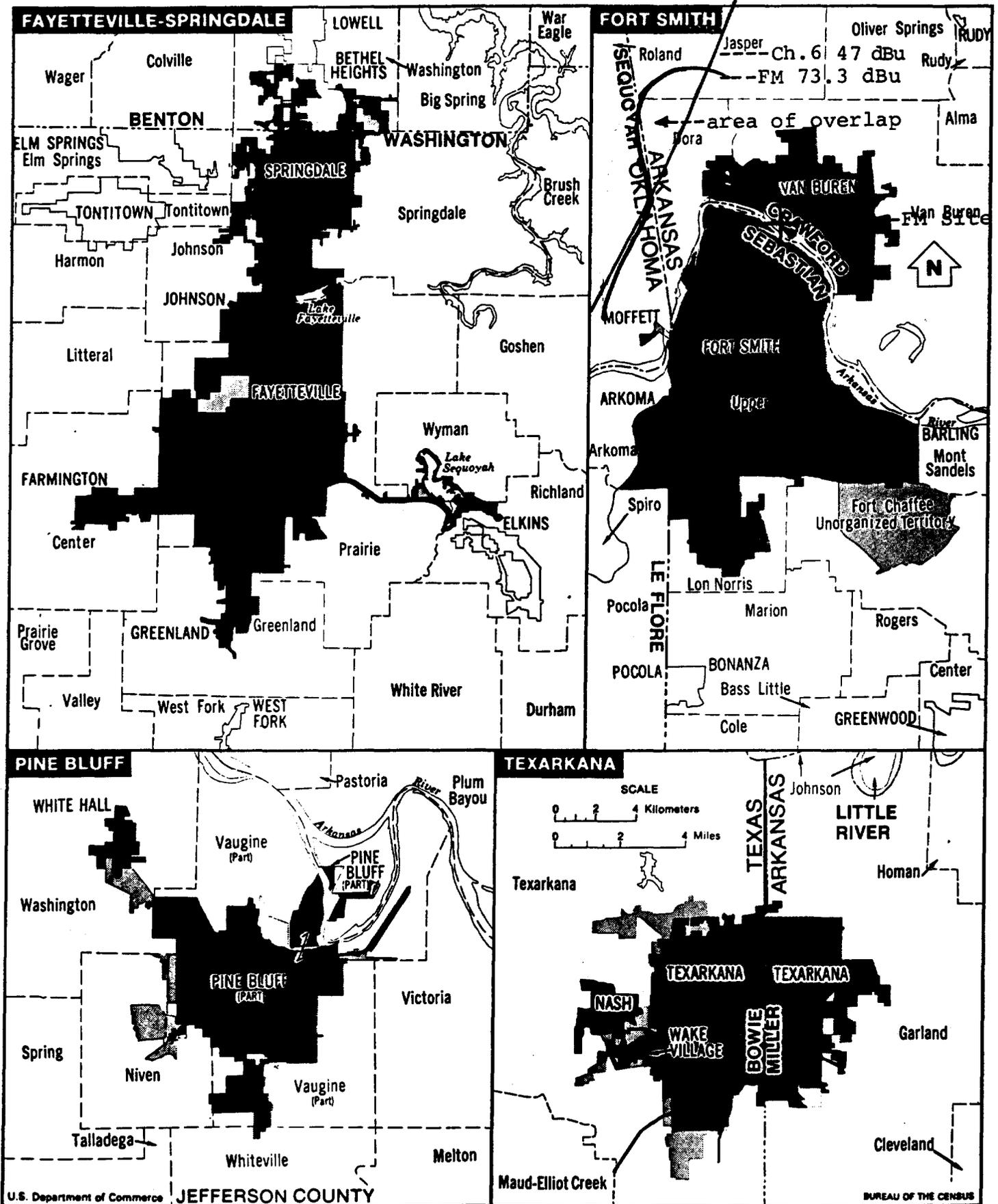
KEMV Channel 6 Grade "B"

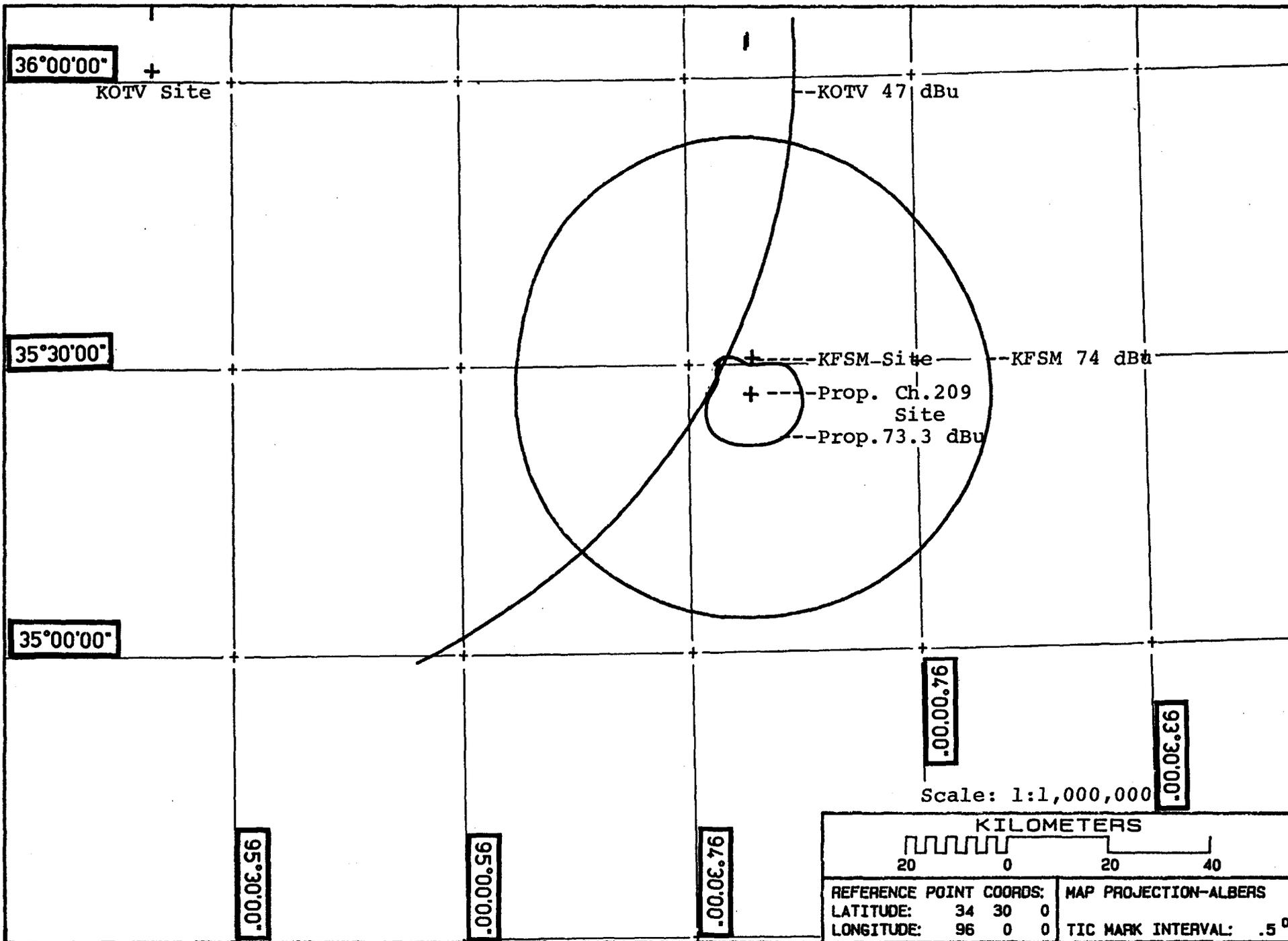
DISTANCES TO CONTOURS (Kilometers):

Frequency: 83.2400 MHz

F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 47.0
218.0	384	20.00	110.1
228.0	444	20.00	115.5
238.0	414	20.00	112.8
248.0	418	20.00	113.2
258.0	417	20.00	113.0
268.0	374	20.00	109.4
278.0	381	20.00	109.9
288.0	365	20.00	108.8
298.0	339	20.00	106.9





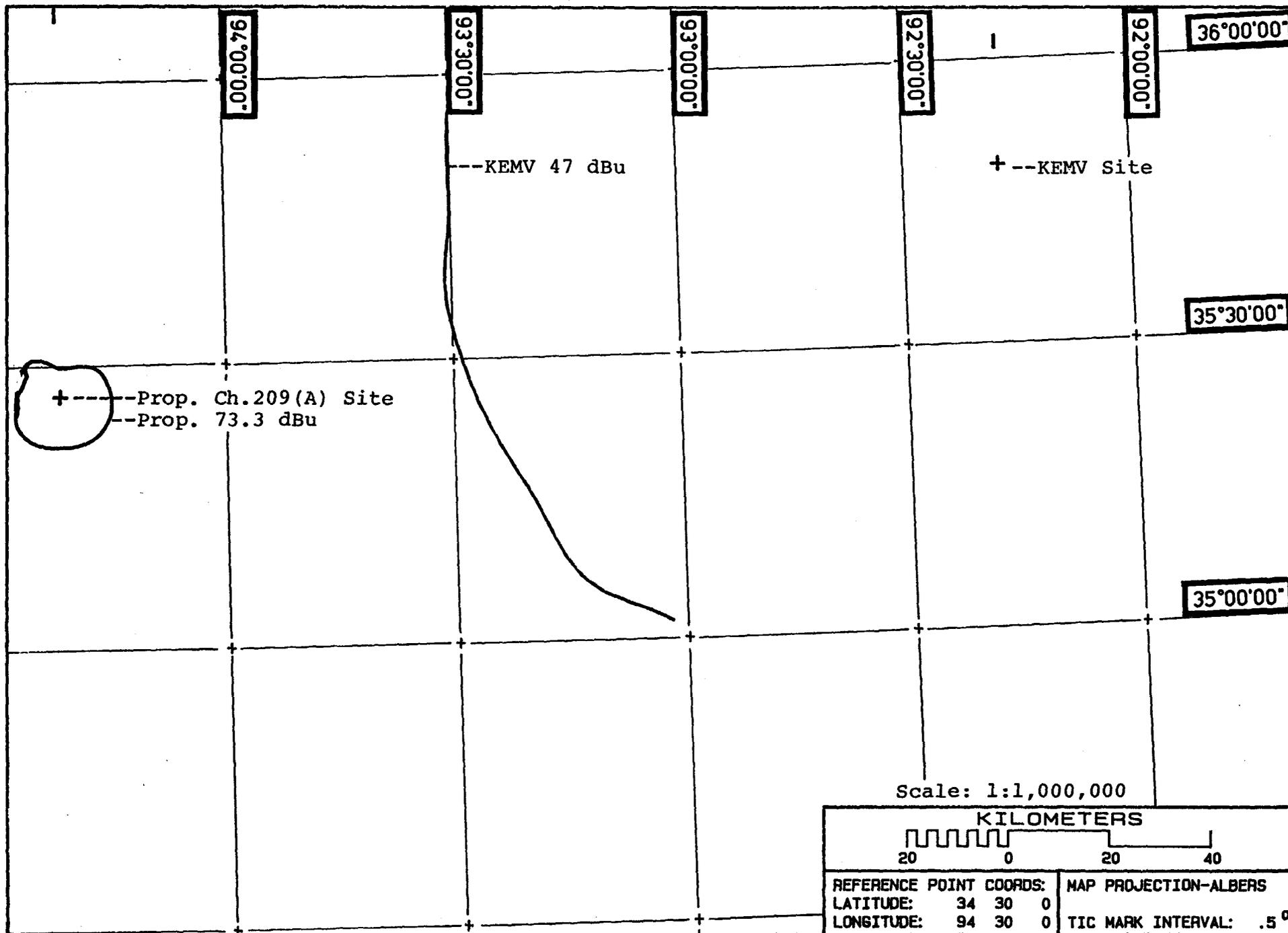


EXHIBIT E-7

Page 8 of 8

STUDY SHOWING COMPLIANCE WITH GUIDELINES CONCERNING  
HUMAN EXPOSURE TO RADIOFREQUENCY RADIATION FROM FM  
FACILITY AS PROPOSED

This proposal to add an Educational FM antenna to an existing tower structure has been evaluated for compliance with FCC guidelines concerning human exposure to radiofrequency radiation, as detailed in OST Bulletin No. 65, October, 1985.

There are no other FM Broadcast or AM Broadcast facilities in proximity to the transmitter site proposed in this application which would require study under this section. The tower proposed for use by the FM station supports various land mobile stations, which are excluded from the studies.

However, on an adjacent tower, there are three (3) Low Power Television stations (LPTV) existing or authorized. Therefore, this proposal has been studied, assuming all three of the LPTV stations to be operating. The data obtained shows that the combined station fields are below the ANSI guidelines for permitted field exposure.

The field from each station has been calculated, and the decimal fraction of the ANSI limit contributed by each station determined. The sum was then taken for the decimal fractions of the limit. The total is less than unity, therefore there is full compliance with the rules.

<u>STATION</u>	<u>FIELD</u>	<u>LIMIT</u>	<u>FRACTION</u>
K27DI	0.0058 mW/cm <sup>2</sup>	1.9 mW/cm <sup>2</sup>	0.003
K46BZ	0.0023	2.2	0.001
K63EG	0.0032	2.4	0.0013
Prop.FM Ch209	0.0038	1.0	0.0038
		Sum:	0.0091

## METHODOLOGY FOR FM RADIATION STUDY

The EPA has developed a computer model which serves as a general means of estimating the power densities in the vicinity of typical FM broadcast stations. As is typical of such models, this frequently results in a "worst case" type of determination, as contrasted with lesser amounts of radiation which may actually be determined to exist by taking of field strength measurements. The EPA model considers the following variable factors:

- (1) Effective radiated power
- (2) Radiation center height above ground
- (3) Polarization of the transmitted signal
- (4) Type of antenna (generic)
- (5) Number of sections (elements or bays) in the array

This particular model is discussed by Gailey and Tell in EPA Report No. 520/6-85-011, April, 1985.

This model makes use of the element and array pattern product and takes into account ground reflections. It is considered to be a reasonable approach for determining the upper bounds of field intensity near transmitting towers on which FM facilities are located.

Calculations are normally made at 2 meters above the ground. Total ERP is used--adding of the vertical and horizontal components. The FCC's OST Report No. 65 provides tables listing the estimates of antenna heights required for compliance with "worst case" situations. (See Table 1.) Reasonable predictions may be made from use of those data. More specific calculations are made by computer, extrapolating the basic data, and providing a printout graphical presentation of the data.

In the case of joint use of a site by TV and FM stations, the fractional contributions are summed. If the sum of all such fractional contributions is less than unity (1.0), it is concluded that there is no problem of exceeding the ANSI guidelines.

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**References:**

1. P. C. Gailey & R. A. Tell. "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services," U. S. Environmental Protection Agency, April, 1985.
2. Federal Communications Commission, OST Bulletin No. 65, "Evaluating Compliance with FCC-Specified Guidelines for Evaluating Human Exposure to Radiofrequency Radiation," by Robert F. Cleveland, October, 1985.
3. Kraus, J. D. "Antennas," McGraw-Edison Book Co., NYC, 1950

## METHODOLOGY FOR TV RADIATION STUDY

The EPA has developed a computer model which serves as a general means of estimating the power densities in the vicinity of typical TV broadcast stations. As is typical of such models, this frequently results in a "worst case" type of determination, as contrasted with lesser amounts of radiation which may actually be determined to exist by taking of field strength measurements. The EPA model considers the following variable factors:

- (1) Effective radiated power
- (2) Radiation center height above ground
- (3) Polarization of the transmitted signal
- (4) Type of antenna (generic)
- (5) Number of sections (elements or bays) in the array

This particular model is discussed by Gailey and Tell in EPA Report No. 520/6-85-011, April, 1985.

This model makes use of the element and array pattern product and takes into account ground reflections. It is considered to be a reasonable approach for determining the upper bounds of field intensity near transmitting towers on which TV facilities are located.

Calculations are normally made at 2 meters above the ground. Total ERP is used--adding of the vertical and horizontal components. The FCC's OST Report No. 65 provides tables listing the estimates of antenna heights required for compliance with "worst case" situations. (See Table 1-4) Reasonable predictions may be made from use of those data. More specific calculations are made by computer, extrapolating the basic data, and providing a printout graphical presentation of the data.

In the case of joint use of a site by TV and FM stations, the fractional contributions are summed. If the sum of all such fractional contributions is less than unity (1.0), it is concluded that there is no problem of exceeding the ANSI guidelines.

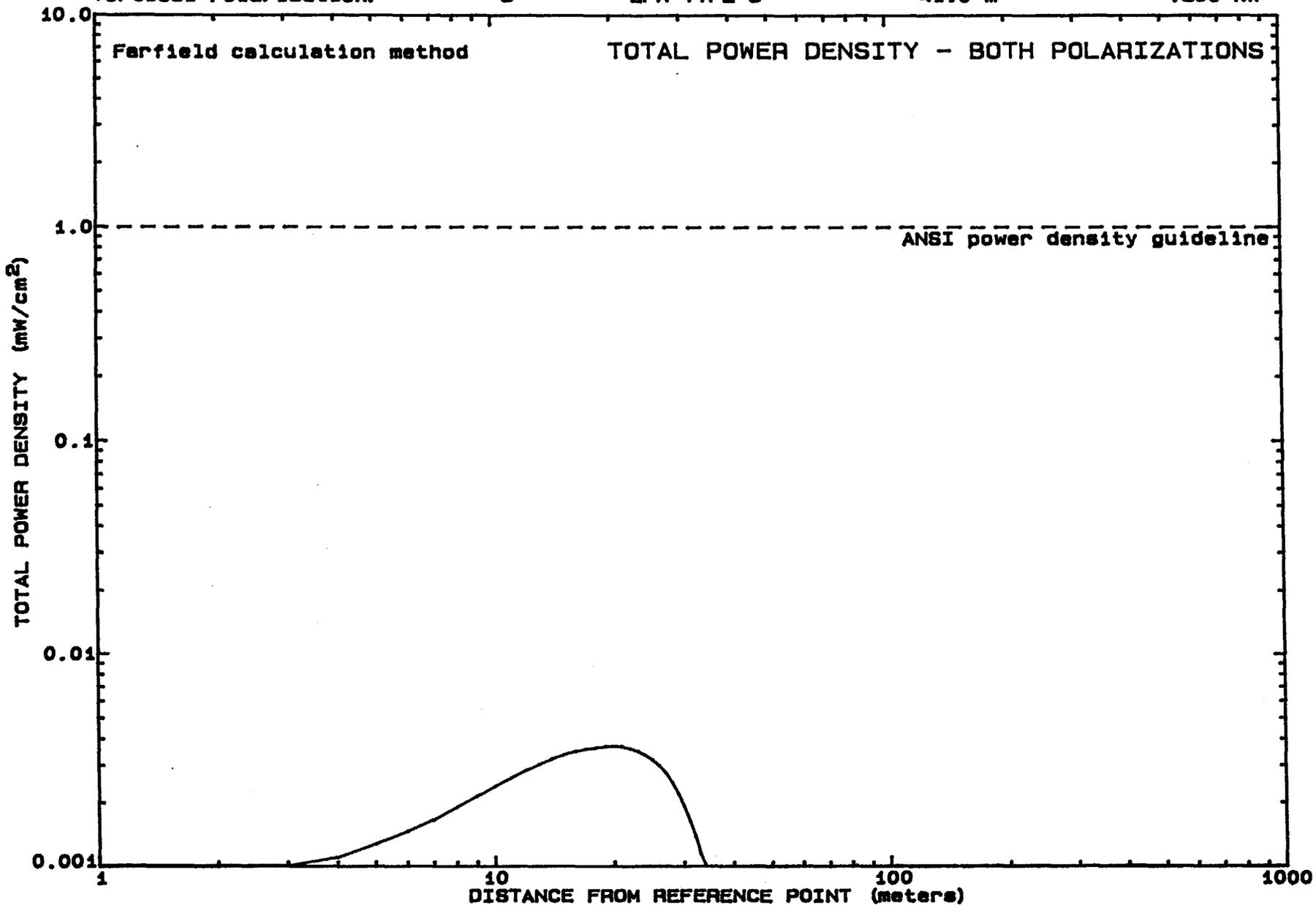
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**References:**

1. P. C. Gailey & R. A. Tell. "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services," U. S. Environmental Protection Agency, April, 1985.
2. Federal Communications Commission, OST Bulletin No. 65, "Evaluating Compliance with FCC-Specified Guidelines for Evaluating Human Exposure to Radiofrequency Radiation," by Robert F. Cleveland, October, 1985.
3. Kraus, J. D. "Antennas," McGraw-Edison Book Co., NYC, 1950

Station: BBN      Frequency: 89.700 MHz      Height of Observer (ARP): 2.0 Meters

	<u>No. of Elements</u>	<u>Element Type</u>	<u>Height of Center (ARP)</u>	<u>Power (ERPd)</u>
Horizontal Polarization:	3	EPA TYPE 3	41.0 m	.800 kW
Vertical Polarization:	3	EPA TYPE 3	41.0 m	.800 kW





Station: K46BZ      Frequency: 663.260 MHz      Height of Observer (ARP): 2.0 Meters

	<u>No. of Elements</u>	<u>Element Type</u>	<u>Height of Center (ARP)</u>	<u>Power (ERPd)</u>
Horizontal Polarization:	16	UHF ELEMENT	84.0 m	20.800 kW

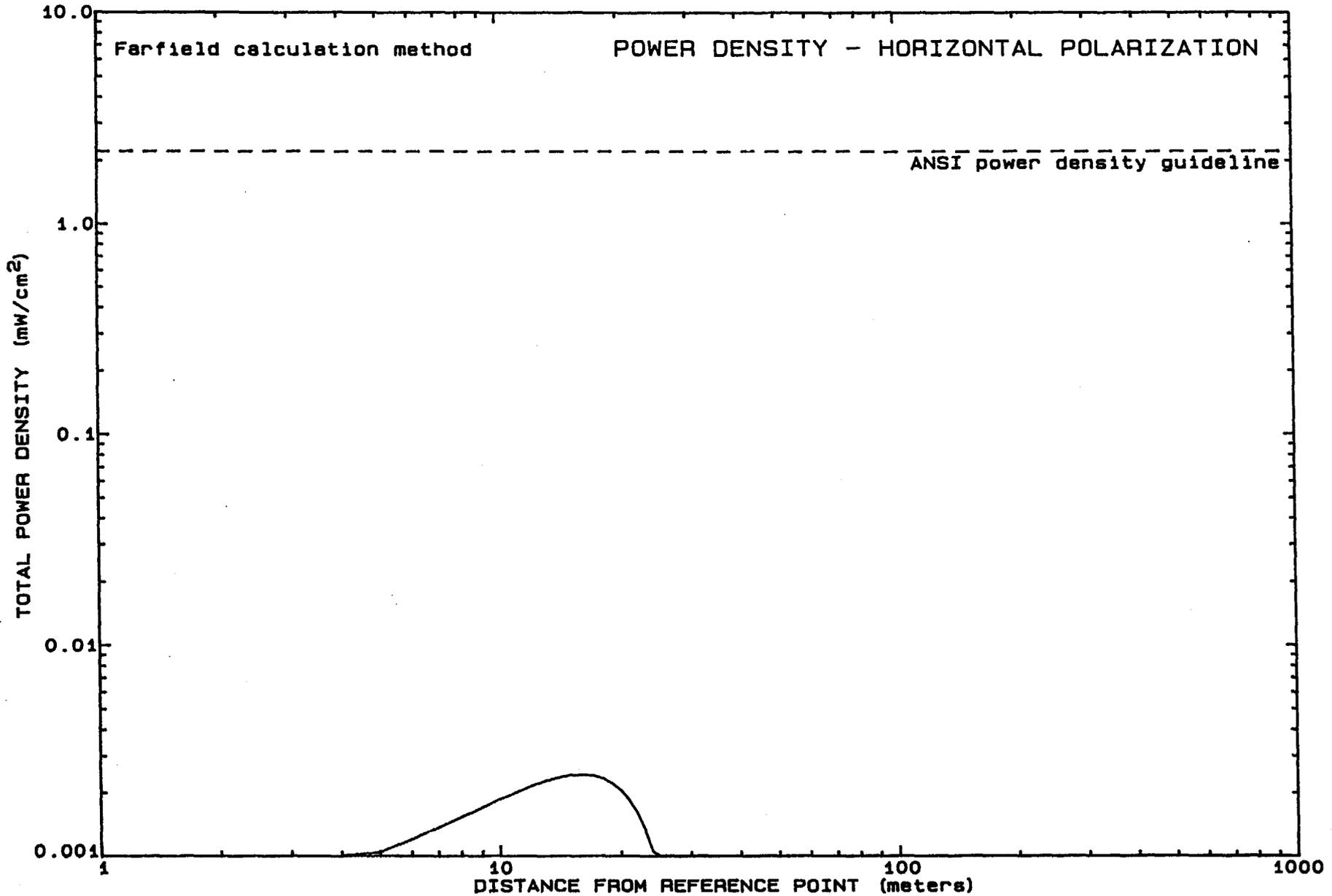




EXHIBIT E-8A

The FM Broadcast facility proposed in the referenced application will not result in human exposure to radiofrequency radiation in excess of the applicable safety standards specified in Section 1.1307(b) of the Commission's rules.

**RADIATION PROTECTION:** This proposal has been evaluated for compliance with FCC guidelines concerning human exposure to radiofrequency radiation. The standards employed are detailed in OST Bulletin No. 65, October, 1985.

Table 1 of Appendix B was employed for the initial study concerning FM broadcast radiation protection.

For the effective radiated power and type of antenna proposed, the minimum antenna radiation center above ground is specified as about 8.2 meters. This application proposes an antenna height above ground of at least 41 meters. Therefore, full compliance with the guidelines is attained by the instant application.

In addition to the protection afforded by the proposed antenna height above ground, the facility will be properly marked with signs, and entry to the facility will be restricted by means of locked gates.

In the event work would be required in proximity to the antenna, or on the tower structure, such that the person or persons working in the area or on the tower would be potentially exposed to fields in excess of the ANSI guidelines, the FM facility will reduce power, or cease operation during the critical period.

FCC  
APP.

AMENDMENT TO APPLICATION

FILE NO. BPED-900816MA

For a New FM Station at  
Fort Smith, Arkansas

June, 1992

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