

# **ENGINEERING EXHIBIT 28**

## **KNOF-FM, Selby Gospel Broadcasting Corporation**

### ***47 CFR 73.215 Discussion, WGMO-FM:***

A short spacing as defined under 47 CFR 73.207 exists with WGMO-FM, Shell Lake, Wisconsin. The short spacing arose from WGMO-FM's own efforts in seeking upgrade to its facilities under 47 CFR 73.215. As such, it was incumbent upon Zoe Communications, Inc. ("Zoe") the licensee of WGMO-FM in its application for upgrade to demonstrate that no prohibited contour overlap would occur with KNOF-FM as defined under 47 CFR 73.215.

For the purposes of WGMO-FM's analysis it was required that KNOF-FM be considered as a maximum class A facility (6.0 Kilowatts at 100 meters HAAT) at its licensed coordinates and that the proposed facility technical parameters (7.1 Kilowatts at 156 meters HAAT) at the proposed coordinates be utilized for WGMO-FM. In effect, WGMO was required to "protect" the licensed KNOF-FM site as a maximum, class A facility. It is noted that the coordinates specified by KNOF-FM in this amendment to the pending construction permit are the licensed coordinates, the same coordinates for KNOF-FM as were specified in the WGMO-FM 47 CFR 73.215 proposal.

As the WGMO-FM upgrade proposal was granted under 47 CFR 73.215, the allocation for KNOF-FM maximum class A facilities at its present licensed coordinates is thus "protected" from prohibited contour overlap with the facilities of WGMO-FM by that grant. The facilities proposed herein in this amendment to the pending KNOF-FM construction permit are therefore compliant with 47 CFR 73.215.