

**Technical Statement in Support of
Center for Communication and Development
Request for Special Temporary Authority
KMOJ (FM), FCC Facility ID # 14679**

Center for Communication and Development ("CCD") has completed construction of the facility contemplated in CP BMPED-20100204ADM for minor modification to its KMOJ (FM), facility id #14679.

Since the facility uses a directional antenna, KMOJ is operating at 50% power (3.1 kW), pursuant to Section 73.1620(a)(2) of the Rules, pending grant of the license application (BLED-20101227AAG).

In the license application, the surveyor's certification of the directional antenna revealed that the tower coordinates contained in the ASR data, upon which CCD relied in its engineering showings, were incorrect.

Upon discovery of the coordinate error, CCD requested verification of the land elevation and physical tower height. A copy of the surveyor's certification of the actual tower coordinates, site elevation, and tower height above ground is attached.

The surveyor found the site elevation to be 7m higher than the ASR data indicate, and the tower to be 23m shorter. Therefore, the overall height of the tower above mean sea level is lower than previously approved by the FAA and contained in the ASR data by 16m. The tower owner has committed to separately correcting this data with the FAA and in the ASR database and has already begun that process. The height of the radiation center of the KMOJ antenna above ground is correct on the construction permit and remains at 116m.

CCD relied in good faith on the accuracy of the ASR data in the creation and prosecution of its application. Given the magnitude of the corrections involved, CCD realizes that it will be required to file an application to modify its construction permit, followed by an amendment to its pending license application. The amendment cannot be filed before the ASR data is corrected, and since an FAA aeronautical study may be triggered, this may take some time.

Meanwhile, KMOJ is seriously disadvantaged by being required to operate at half power.

Given the innocent nature of CCD's involvement, and its commitment to correcting its construction permit, CCD requests an STA to operate at increased power, at a power level that does not exceed what was approved in its construction permit, adjusted for the survey results.

The following map shows that the requested 60 dBu f(50,50) contour of KMOJ will fall entirely within the CP-authorized 60 dBu f(50,50) contour. That is normally sufficient to show that the proposed operation will cause no objectionable interference.

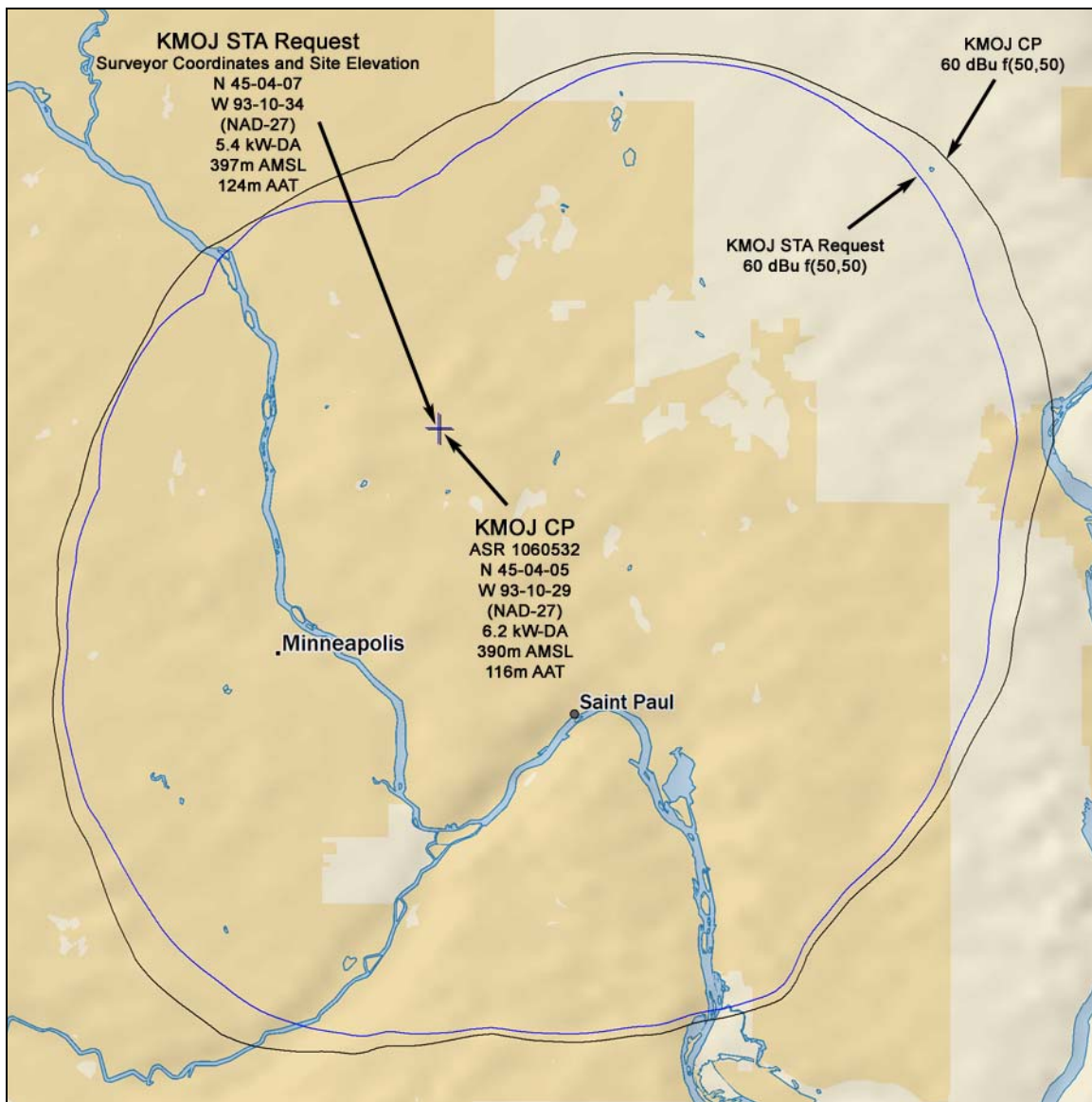
Skywaves Consulting LLC
PO Box 4, Millbury, MA 01527

Main Number: 401-354-2400

Washington: 202-370-6357

<http://www.skywaves.com>

consultants@skywaves.com



The requested 60 dBu f(50,50) contour was generated using the actual, range tested and certified pattern provided by the manufacturer, and a maximum Effective Radiated Power of 5.4 kW. It takes into account the surveyor's findings and is based on an HAAT of 124 m.

The CP 60 dBu f(50,50) contour was generated using the envelope pattern and a 6.2kW maximum ERP at an HAAT of 116m.

Certifications from a surveyor regarding the antenna azimuth, from the antenna manufacturer regarding the pattern, and from the engineer who supervised the installation are on file in BLED-20101227AAG. None of these are affected by the correction in the coordinates, site elevation, and overall height of the tower structure.

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Attachment

Surveyor's certification of coordinates, land elevation, and tower height

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Egan, Field & Nowak, Inc.

Client: Arden Towers, Inc.
3440 Bayside Road
Orono, MN 55356-9218

Horizontal Datum Source (select all that apply):

☐ Ground survey ☒ GPS survey ☒ NAD 83 ☐ NAD 27

Vertical Datum Source (select all that apply):

☐ Ground survey ☒ GPS survey ☒ NAVD 88 ☐ NGVD 29

Structure Type (select one):

☐ New Tower ☒ Existing Tower ☐ Roof Top ☐ Water Tank ☐ Smokestack
☐ Other (describe):

Latitude: 45° 04' 07.11" North NAD 83
Longitude: 93° 10' 35.10" West NAD 83
Ground Elevation: 922 feet NAVD 88 / or 281.02 Meters NAVD 88
Height of Tower: 625 feet AGL / or 190.50 Meters AGL

CERTIFICATION: I certify that the latitude of 45°04'07.11" North and the longitude of 93°10'35.10" West, and that the site ground elevation of 922 feet NAVD 88 was determined based upon a site survey performed under my direct supervision on January 24, 2011.

The horizontal datum (coordinates) are based on the North American Datum of 1983 (NAD 83-96 Adjustment) and are expressed in degrees, minutes and seconds to the nearest hundredth of a second. The vertical datum (heights) are based on the North American Vertical Datum of 1988 (NAVD 88) and are determined to the nearest foot.

Surveyor Signature/Seal:



Printed Name:

Brent R Peters

Professional Surveyor #:

44123

Company:

EGAN, FIELD & NOWAK, INC.

Phone:

612-466-3300

Date:

January 27, 2011