

EXHIBIT 28

Compliance with 73.215

The proposed facility is fully-spaced with all other stations and authorizations, except for first-adjacent station KRSE, Yakima WA. The 1.5km short spacing is easily within the 73.215(e) limits. Contour protection with KRSE is shown by **Exhibits 28a and 28b**. The ERP has been reduced slightly below the allowable class maximum to achieve this contour protection, using a non-directional antenna.

A theoretical (and buildable) fully-spaced site is available at 45:41:12N; 121:32:31W. This is just 3km from the reference coordinates of Hood River - the city of license, and just 1.8km from the currently licensed site of KCGB. 70dbu coverage could easily be provided over the entire city of Hood River, from this site.

BROWN BROADCAST SERVICES
INCORPORATED

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Exhibit 28a - Prop. KCGB vs KRSE

Brown Broadcast Services, Inc.
Job: KCGB @ US CELL FINAL.fmj
Master Database: 2004_Jul_21.fmd
Lat: N45:40:59 Lon: W121:27:49 NAD-27
Scale: 1:1250000
Channel: 288 Class: A
Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF
Range: 70 km, Clearance: -0.5km
Comments: No Comments
Description: 860w ERP ND

rfInvestigator-FM Version 2.0.135
by rfSoftware, Inc.
Date: 7/21/2004 2:14:47 PM
Key:

City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

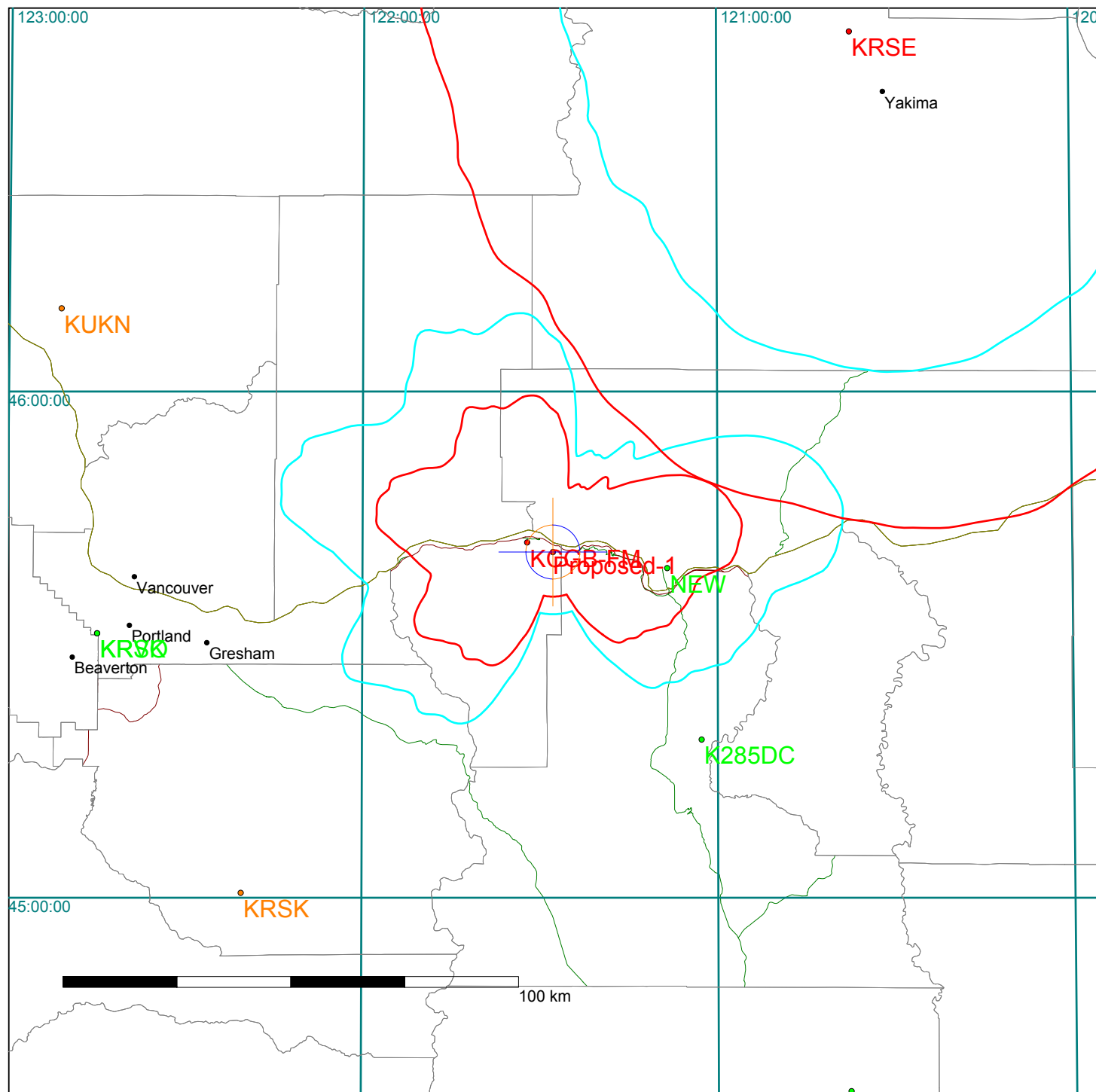


Exhibit 28b - Prop. KCGB vs KRSE - detail

Brown Broadcast Services, Inc.
Job: KCGB @ US CELL FINAL.fmj
Master Database: 2004_Jul_21.fmd
Lat: N45:49:29 Lon: W121:02:10 NAD-27 (center of map - not site)
Scale: 1:75000
Channel: 288 Class: A
Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF
Range: 84 km, Clearance: -0.5km
Comments: No Comments
Description:

rfInvestigator-FM Version 2.0.135
by rfSoftware, Inc.
Date: 7/21/2004 2:04:32 PM
Key:

City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

