

# 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

Michael D. Brown

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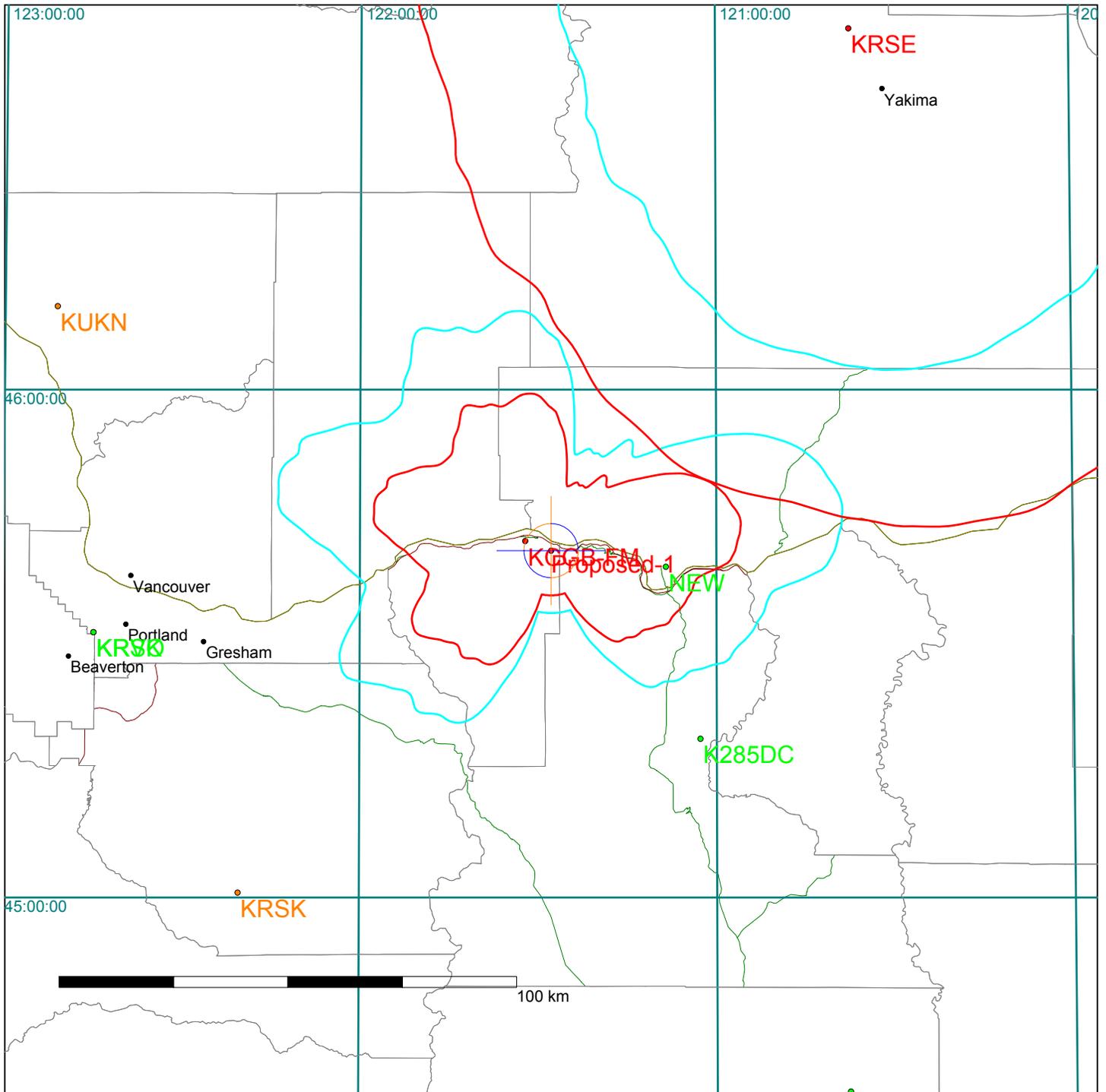
503-245-6065

# 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

