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AMENDMENT

to

FCC FILE NO. BP-20011024ABI

FCC FORM 301, SECTION III-A
KAJO, 1270 kHz, Grants Pass, OR
Grants Pass Broadcasting Corporation

This amendment concerns the application tendered to the FCC, File No. BP-20011024ABI, for a construction permit to increase the power for standard AM radio station KAJO, 1270 kHz, Grants Pass, Oregon, licensed to Grants Pass Broadcasting Corporation (GPBC). A waiver of 47 CFR Section 73.24(g) is requested.

A correction of the overall height of the tower initially stated as 124.4 meters is necessary in Section III-A, Tech Box question 4.c. and 5.c. The correct overall height is **123.4** meters. The tower height stated elsewhere in the application is correct.

The existing and proposed 1 V/m contours are plotted on a USGS 7.5 minute topographic map in Exhibit E-3A of the original application. As stated in the application, a current aerial photograph of the area surrounding the KAJO antenna site could not be located. Therefore, in compliance with the Instructions for Form 301, Item 7, photographs taken in eight cardinal directions from an elevated position on the KAJO tower were taken and are included as Exhibit EA-8.

The total 2000 census population within the proposed 1 V/m contour is 1699 persons. This is greater than 1.0 percent of the population within the 25 mV/m contour. **Therefore, a waiver of 47 CFR Section 73.24(g) is requested.** The original application stated "The Applicant acknowledges the responsibility to satisfy all reasonable complaints of blanketing interference within the contour (1 V/m) in compliance with 47 CFR Section 73.318(b), (c) and (d)."

The above referenced Section 73.318 generally requires correction of interference only to RF devices and **specifically excludes** malfunctioning receivers, improperly installed antenna systems, high gain antennas or booster amplifiers, mobile receivers and non-RF devices such as tape recorders, hi-fi amplifiers and phonographs.

The Applicant, GPBC, believes the above referenced FCC requirements are minimal and do not sufficiently protect the public. GPBC is the only commercial AM radio station serving the greater Grants Pass area and has, and will continue to be, operated in the public's best interest.

GPBC has continued to provide technical assistance to all persons calling the station regarding interference to electronic devices of all kinds. This technical assistance will continue to be provided to all persons whether or not they actually live within the 1 V/m contour. GPBC has a technical staff that can offer this service and knows that the FCC "Interference Handbook" is a publication describing useful initial mitigation methods only but that successful correction of interference to computers, modems, etc. often requires extensive and sophisticated electronic filtering techniques.

GPBC has choosen to increase power only to 10 kW, and not the 35 kW possible, specifically to minimize potential for radio frequency interference to homes in the vicinity of the tower. Providing a responsible broadcast service to the community, GPBC will make every effort to correct all instances of RF interference resulting from the operation of KAJO, and believes a waiver of 47 CFR Section 73.24(g) is in the public's interest.

Compliance with 47 CFR Section 73.37 was completely tabulated in Exhibit E-5 of the original application. Pages 1-5 detailed the soil conductivity from FCC Figure M3 for all directions from the KAJO antenna site. Pages 6-9 are a tabulation of 61 co-channel and adjacent channel licensed stations, applications, and construction permits, on frequencies of 1240 kHz to 1300 kHz, that were checked with the computer for potential for interference resulting from the power increase from 5 kW to 10 kW. Pages 10-12 of Exhibit E-5 tabulates the Daytime Permissible Horizontal Radiation limits from KAJO in every direction. The most limiting restriction for a daytime power increase is 2322.6 mV/m at 1 kilometer on the 7 degree radial towards KRVM, 1280 kHz. This corresponds to a maximum possible non-directional power of 35 kW for KAJO.

Exhibit E-5 was computed on February 29, 2000. Therefore, current data was obtained from the FCC AM Search data files for the 12 closest co-channel and adjacent channel stations which did confirm that the data used in Exhibit E-5 had not changed. Attached as Exhibit EA-7 is a portion of the FCC Figure M3 soil conductivity map showing the proposed 10 kW KAJO contours and the interfering and protected contours for the four closest AM stations, KRVM, KBAM, KBZZ and KXBX. As can be seen on Exhibit EA-7 there is ample clearance between all protected and interfering contours for all stations. No further detailed investigation is necessary.

The distances to these protected and interfering contours are as follows.

KAJO. 10 kW, 42° 26' 16"N, 123° 21' 27"W

RMS =	389.50 mV/m @ 1km per 1 kW
0.5 mV/m	73 km
0.25 mV/m	98 km
0.025 mV/m	228 km

KRVM. 5.0 kW, 44° 06' 03"N, 123° 03' 06"W
RMS = 370.30 mV/m @ 1km per 1 kW
0.5 mV/m 61 km
0.25 mV/m 83 km

KBAM. 5.0 kW, 46° 10' 59"N, 122° 57' 29"W
RMS = 313.82 mV/m @ 1km per 1 kW
0.5 mV/m 56 km
0.025 mV/m 188 km

KBZZ. 13 kW, 39° 32' 01"N, 119° 39' 48"W
RMS = 305.78 mV/m @ 1km per 1 kW
0.5 mV/m 96 km all pertinent radials
0.025 mV/m 278 km N295E radial
251 km N300E radial
254 km N305E radial
255 km N310E radial
262 km N315E radial

KXBX. 0.5 kW, 39° 00' 50"N, 122° 53' 39"W
RMS = 296.12 mV/m @ 1km per 1 kW
0.5 mV/m 47 km N320E radial
47 km N330E radial
46 km N340E to N030E radial
0.025 mV/m 139 km N320E radial
138 km N330E radial
137 km N340E radial
137 km N350E radial
139 km N000E radial
150 km N010E radial
170 km N020E radial
168 km N030E radial

Respectfully submitted,

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McClanathan and Associates, Inc.

March 22, 2002