

MODIFY BMPH-20080331ACU
CUMULUS LICENSING LLC
KNRQ-FM RADIO STATION
CH 250C1 - 97.9 MHZ - 10.0 KW
ALOHA, OREGON
August 2010

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of FM station KNRQ-FM, Channel 250C, Eugene, Oregon. Cumulus also holds an outstanding permit to change the community of license to Tualatin, Oregon and change to Channel 250C2 (BMPH-20080331ACU). Cumulus herein proposes to upgrade KNRQ-FM to Channel 250C1, and proposes to change the community of license from Tualatin, Oregon to Aloha, Oregon, using the one-step application procedure, as outlined in MB Docket #05-210 (released November 29, 2006). As will be shown, the use of Channel 250C1 at the proposed new community of license is mutually exclusive with the present KNRQ-FM operation on Channel 250C at both Eugene, Oregon and the permitted facilities on Channel 250C2 at Tualatin, Oregon. The proposed KNRQ-FM facility will share an antenna system with several other FM stations co-located at the proposed KNRQ-FM site. Cumulus will provide measurements following construction demonstrating that the KNRQ-FM facility is in compliance with §73.317 of the Commission's rules.

In order to accommodate the upgrade to Channel 250C1, Cumulus requests the Commission issue an Order to Show Cause to the licensee of FM station KCYS, Channel 251A, Seaside, Oregon as to why its license should not be modified to specify Channel 243A in lieu of

Channel 251A. The proposed use of Channel 243A at Seaside, Oregon is mutually exclusive with the proposed use of Channel 243A at Gearhart, Oregon as requested in MB Docket #10-118. Therefore, this instant application is being submitted as part of a hybrid counterproposal in that docket. In addition to the proposed substitution at Seaside, Oregon, Cumulus also proposes the substitution of Channel *243C1 for the vacant allotment of Channel *251C1 at Madras, Oregon.¹ Additional information containing the proposed channel change at Seaside and other requested changes to vacant allotments to accommodate the Seaside/Gearhart proposal are contained herein following the proposed KNRQ-FM facility review.

Cumulus is proposing to implement this change of community of license at the existing tower site specified in its outstanding permit. Therefore, the Federal Aviation Administration (“FAA”) was not apprised of this proposal. The tower has been registered with the FCC and assigned Antenna Structure Registration Number 1204059. At the proposed implementation site, Channel 250C1 does not meet the Commission’s minimum distance separation requirements to one other station. Therefore, a designated allocation reference site for Channel 250C1 has been identified. Attached as Exhibit A is a demonstration that the proposed Channel 250C1 allotment at Aloha, Oregon complies with the allocation criteria and §73.207 of the Commission’s rules.

At the implementation site KNRQ-FM is shortspaced to our other facility which is addressed pursuant to §73.215 of the rules. See Exhibit B for details. Due to the location of the KNRQ-FM antenna on a tower with other nearby FM and TV stations, the worksheets associated

1) There are two pending applications for Channel 8251C1 at Madras, Oregon. The proposed replacement channel can be used at either of these application sites, in addition to the Channel *251C1 allocation site. It is noted that the Channel *251C1 is reserved for non-commercial operation. However, since Channel *243C1 can be allotted at the same allocation site as Channel *251C1, a reservation review was not undertaken.

with FCC Form 301 could not be used to show compliance with the Commission's radio frequency radiation exposure limits. Therefore, attached as Exhibit C is a study showing that this proposal is in compliance with the RF limits.

As indicated in Exhibit D, the proposed change of community of license from Tualatin, Oregon to Aloha, Oregon² is mutually exclusive with the presently licensed operation of Channel 250C at Eugene, Oregon and the permitted facility for KNRQ-FM at Tualatin, Oregon, from a designated allocation site (different than the proposed implementation site), Channel 250C1 meets the Commission's minimum distance separation requirements; will deliver a signal over all of Aloha, Oregon; and a review of the gain of service area shows this proposal is in the public interest. Therefore, this proposal meets the Commission's technical rules for a city of license change.

Attached as Exhibit E is a copy of the engineering portion of the counterproposal in MB Docket #10-118 which shows the requested channel change needed to accommodate the alternate change at Gearhart, Oregon.

It is noted that the proposed implementation site for KNRQ-FM site is located within 3.2 kilometers of daytime/nighttime antenna system for KXFD, 970 kHz, Portland, Oregon. The antenna that KNRQ-FM will share is already located on the tower, along with the associated transmission line. As such, the KXFD antenna array is not expected to be impacted. Further, the

2) As KNRQ-FM is not operational in Tualatin, Oregon, no actual or potential loss of service is created.

tower on which the FM antenna is installed is not base insulated nor detuned at the KXFD frequency. Therefore, it is respectfully requested that no pre-construction or post-construction measurement conditions be placed on the requested KNRQ-FM permit.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Cumulus and is available to the Commission upon request.³

3) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All data regarding broadcast facilities was extracted from the CDBS database on the date indicated on the spacing studies. We assume no liability for errors or omissions in that database which may be adverse to the request contained herein.