

MINOR CHANGE APPLICATION
PETRACOM OF HOLBROOK, L.L.C.
KZUA RADIO STATION
CH 221C1 - 92.1 MHZ - 100.0 KW
HOLBROOK, ARIZONA
November 2010

EXHIBIT B

The actual/proposed KZUA antenna location is shortspaced to one other FM facility: the permitted site for station KRDC, Channel 220C1, Many Farms, Arizona. The relevant distance between the stations is shown on Exhibit B1. Petracom proposes to use the provisions of §73.215 of the Commission's rules to address this shortspace. The shortage to this station complies with §73.215(e) of the Commission's rules. Compliance is based on operating with less than maximum Class C1 facilities.

Exhibit B2 specifically demonstrates that there will be no prohibited overlap between the proposed KZUA and KRDC. The contours of KRDC are based on authorized facilities.¹ Attached as Exhibits B3 and B4 are the tabulated distances to the protected and interfering contours along the pertinent arcs of the proposed KZUA and KRDC. Further, attached as Exhibit B5 are the tabulated and protected contours of the proposed KZUA facility, in ten degree increments. Again, there is no prohibited overlap between the facilities.

1) Non-commercial facilities are afforded protection based on actual facilities, rather than at maximum for the Class. Commercial stations adjacent to the non-commercial band, for the purposes of §73.215, were directed to protect non-commercial stations to actual facilities; Memorandum Opinion and Order, MM Docket 87-121, FCC 91-273, Adopted August 28, 1991, Released September 17, 1991, paragraph 53.

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EXHIBIT B1

Clearance Study for KZUA Holbrook, Arizona
Using Actual Site as Reference

REFERENCE	CLASS = C1	DISPLAY DATES
34 55 13.0 N.		DATA 11-01-10
110 07 53.0 W.	Current Spacings to 3rd Adj.	SEARCH 11-01-10
----- Channel 221 - 92.1 MHz -----		

Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
KZUA	LIC 221C1	Holbrook	AZ 253.1	0.8	245.0	-244.2	
	34 55 05.0	110 08 25.0	CN 100.000 kW		81 M		
	Petracom of Holbrook, L.L.C. BLH-19940120KA						
* KRDC	CP -N 220C1	Many Farms	AZ 9.6	161.1	177.0	-15.9	
	36 21 06.0	109 49 51.0	NCX 5.500 kW		496 M		
	Din College BNPED-20071012AUE						
KTHQ	LIC 223C1	Eagar	AZ 145.9	89.5	82.0	7.5	
	34 15 06.0	109 35 06.0	C 65.000 kW		359 M		
	Country Mountain Airwaves BLH-20100426AAW						
NEW	CP 219C2	Springerville	AZ 145.9	89.5	79.0	10.5	
	34 15 06.0	109 35 06.0	CX 5.000 kW		379 M		
	The Sister Sherry Lynn Found BNPED-20071022AAL						
DKSGC	VAC 221A	Tusayan	AZ 303.9	211.3	200.0	11.3	
	35 57 45.0	112 04 45.0	N 6.000 kW		100 M		
KVJC	LIC 220C2	Globe	AZ 199.9	191.8	158.0	33.8	
	33 17 37.0	110 50 09.0	CX 0.660 kW		1035 M		
	Calvary Chapel of Twin Falls BMLED-20090414ADJ						
KTAR-FM	LIC 222C	Glendale	AZ 225.8	250.5	209.0	41.5	
	33 19 58.0	112 03 48.0	C 100.000 kW		545 M		
	Bonnevill Holding Company BLH-20040707ABM						
KPUB	LIC 219C3	Flagstaff	AZ 285.3	139.6	76.0	63.6	
	35 14 34.0	111 36 40.0	CN 0.500 kW		560 M		
	Northern Arizona University BLEED-19960119KA						
NEW	CP -D 220A	Grants	NM 83.1	204.6	133.0	71.7	
	35 07 09.0	107 54 08.0	DCX 3.000 kW		49 M		
	Available Media, Inc. BNPED-20100811AAA						

* Note : This shortage is addressed under \$73.215 of the rules, see Exhibit B.

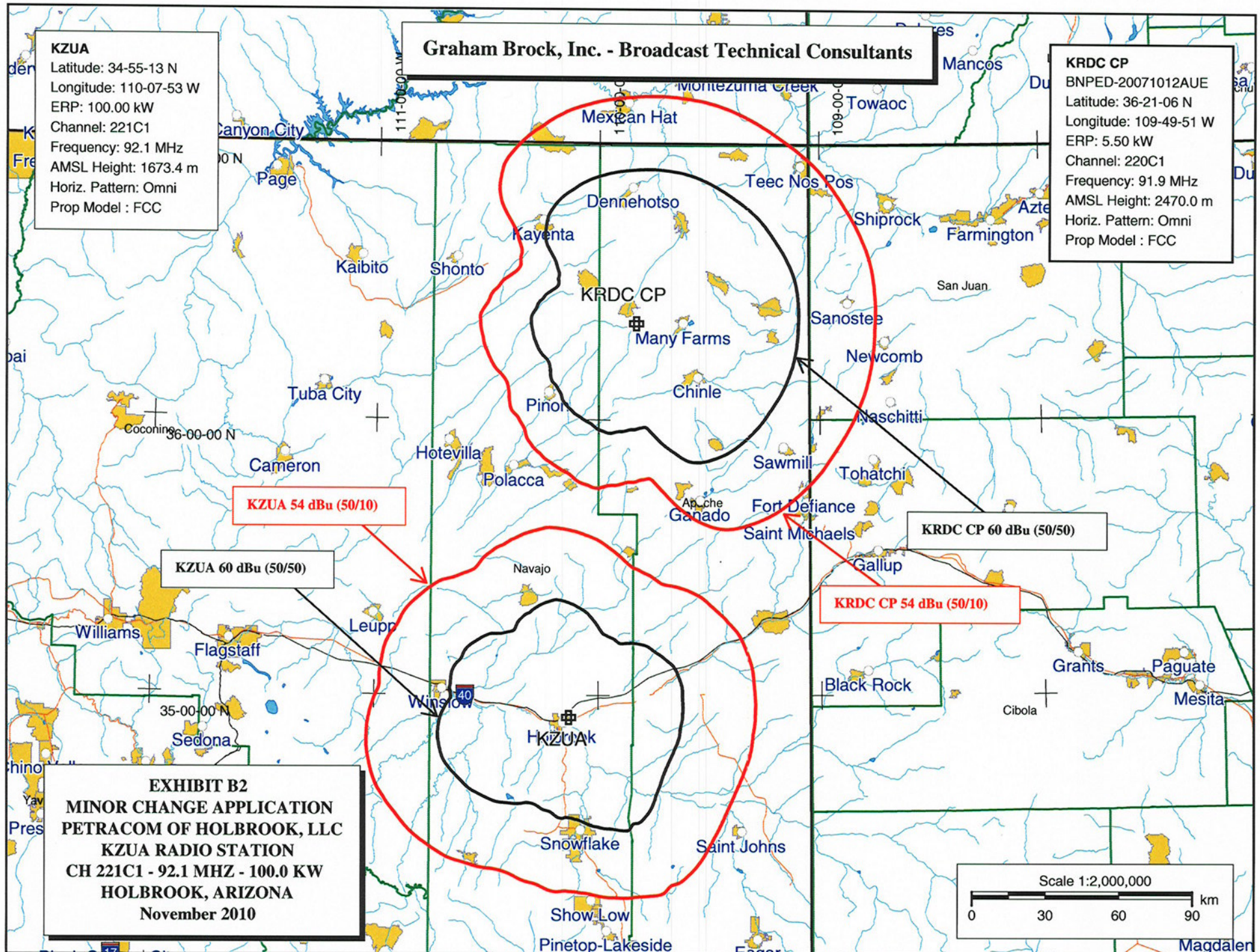
Graham Brock, Inc. - Broadcast Technical Consultants

KZUA

Latitude: 34-55-13 N
Longitude: 110-07-53 W
ERP: 100.00 kW
Channel: 221C1
Frequency: 92.1 MHz
AMSL Height: 1673.4 m
Horiz. Pattern: Omni
Prop Model : FCC

KRDC CP

BNPED-20071012AUE
Latitude: 36-21-06 N
Longitude: 109-49-51 W
ERP: 5.50 kW
Channel: 220C1
Frequency: 91.9 MHz
AMSL Height: 2470.0 m
Horiz. Pattern: Omni
Prop Model : FCC



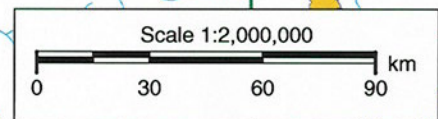
KZUA 54 dBu (50/10)

KZUA 60 dBu (50/50)

KRDC CP 60 dBu (50/50)

KRDC CP 54 dBu (50/10)

EXHIBIT B2
MINOR CHANGE APPLICATION
PETRA COM OF HOLBROOK, LLC
KZUA RADIO STATION
CH 221C1 - 92.1 MHz - 100.0 KW
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CH 221C1 - 92.1 MHZ - 100.0 KW
HOLBROOK, ARIZONA
November 2010

EXHIBIT B3

KZUA - Proposed
Channel = 221C1
Max ERP = 100 kW
RCAMSL = 1673.4 M
N. Lat = 34 55 13
W. Lng = 110 07 53

KRDC - BNPED-20071012AUE
Channel = 220C1
Max ERP = 5.5 kW
RCAMSL = 2470 M
N. Lat = 36 21 06
W. Lng = 109 49 51

Protected
60 dBu

Interfering
54 dBu

30 Second terrain database

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
340.0	100.0000	0073.5	045.3	200.2	005.5000	0312.6	123.8	37.1
341.0	100.0000	0075.0	045.6	200.0	005.5000	0312.6	123.1	37.2
342.0	100.0000	0076.3	045.9	199.8	005.5000	0312.6	122.3	37.4
343.0	100.0000	0077.1	046.1	199.6	005.5000	0312.6	121.7	37.5
344.0	100.0000	0078.3	046.4	199.3	005.5000	0313.3	121.0	37.7
345.0	100.0000	0079.5	046.6	199.1	005.5000	0313.3	120.3	37.8
346.0	100.0000	0080.4	046.8	198.8	005.5000	0313.3	119.7	38.0
347.0	100.0000	0081.2	047.0	198.5	005.5000	0313.3	119.1	38.1
348.0	100.0000	0081.8	047.1	198.2	005.5000	0313.1	118.6	38.2
349.0	100.0000	0082.2	047.2	197.9	005.5000	0313.1	118.1	38.3
350.0	100.0000	0082.6	047.3	197.5	005.5000	0313.1	117.7	38.4
351.0	100.0000	0083.2	047.5	197.2	005.5000	0313.0	117.2	38.5
352.0	100.0000	0084.1	047.6	196.9	005.5000	0313.0	116.6	38.7
353.0	100.0000	0084.7	047.8	196.5	005.5000	0313.0	116.2	38.8
354.0	100.0000	0084.5	047.7	196.1	005.5000	0314.6	115.9	38.9
355.0	100.0000	0083.6	047.5	195.7	005.5000	0314.6	115.8	38.9
356.0	100.0000	0082.8	047.4	195.3	005.5000	0316.2	115.7	39.0
357.0	100.0000	0081.6	047.1	194.9	005.5000	0316.2	115.6	39.0
358.0	100.0000	0080.3	046.8	194.4	005.5000	0315.8	115.7	39.0
359.0	100.0000	0078.8	046.5	194.0	005.5000	0315.8	115.8	39.0
000.0	100.0000	0077.5	046.2	193.6	005.5000	0315.8	115.8	39.0
001.0	100.0000	0076.3	045.9	193.2	005.5000	0312.8	115.9	38.8
002.0	100.0000	0075.0	045.6	192.8	005.5000	0312.8	116.0	38.8
003.0	100.0000	0073.6	045.3	192.3	005.5000	0306.3	116.2	38.6
004.0	100.0000	0071.8	044.9	191.9	005.5000	0306.3	116.5	38.5
005.0	100.0000	0070.2	044.5	191.5	005.5000	0306.3	116.8	38.4
006.0	100.0000	0068.7	044.2	191.1	005.5000	0300.0	117.0	38.2
007.0	100.0000	0067.3	043.9	190.7	005.5000	0300.0	117.3	38.2
008.0	100.0000	0066.0	043.6	190.4	005.5000	0294.4	117.6	38.0
009.0	100.0000	0064.4	043.2	190.0	005.5000	0294.4	117.9	37.9
010.0	100.0000	0062.6	042.7	189.6	005.5000	0294.4	118.4	37.8
011.0	100.0000	0060.5	042.2	189.3	005.5000	0291.3	118.9	37.6
012.0	100.0000	0058.4	041.7	188.9	005.5000	0291.3	119.5	37.5
013.0	100.0000	0056.4	041.1	188.6	005.5000	0291.3	120.1	37.3
014.0	100.0000	0054.7	040.6	188.3	005.5000	0289.3	120.7	37.1
015.0	100.0000	0053.1	040.1	188.0	005.5000	0289.3	121.3	37.0
016.0	100.0000	0051.6	039.5	187.7	005.5000	0289.3	121.9	36.9
017.0	100.0000	0050.0	039.0	187.4	005.5000	0286.3	122.5	36.7

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EXHIBIT B4

KZUA - Proposed
Channel = 221C1
Max ERP = 100 kW
RCAMSL = 1673.4 M
N. Lat = 34 55 13
W. Lng = 110 07 53

KRDC - BNPED-20071012AUE
Channel = 220C1
Max ERP = 5.5 kW
RCAMSL = 2470 M
N. Lat = 36 21 06
W. Lng = 109 49 51

Protected
60 dBu

Interfering
54 dBu

30 Second terrain database

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
340.0	100.0000	0073.5	045.3	200.2	005.5000	0312.6	123.8	37.1
341.0	100.0000	0075.0	045.6	200.0	005.5000	0312.6	123.1	37.2
342.0	100.0000	0076.3	045.9	199.8	005.5000	0312.6	122.3	37.4
343.0	100.0000	0077.1	046.1	199.6	005.5000	0312.6	121.7	37.5
344.0	100.0000	0078.3	046.4	199.3	005.5000	0313.3	121.0	37.7
345.0	100.0000	0079.5	046.6	199.1	005.5000	0313.3	120.3	37.8
346.0	100.0000	0080.4	046.8	198.8	005.5000	0313.3	119.7	38.0
347.0	100.0000	0081.2	047.0	198.5	005.5000	0313.3	119.1	38.1
348.0	100.0000	0081.8	047.1	198.2	005.5000	0313.1	118.6	38.2
349.0	100.0000	0082.2	047.2	197.9	005.5000	0313.1	118.1	38.3
350.0	100.0000	0082.6	047.3	197.5	005.5000	0313.1	117.7	38.4
351.0	100.0000	0083.2	047.5	197.2	005.5000	0313.0	117.2	38.5
352.0	100.0000	0084.1	047.6	196.9	005.5000	0313.0	116.6	38.7
353.0	100.0000	0084.7	047.8	196.5	005.5000	0313.0	116.2	38.8
354.0	100.0000	0084.5	047.7	196.1	005.5000	0314.6	115.9	38.9
355.0	100.0000	0083.6	047.5	195.7	005.5000	0314.6	115.8	38.9
356.0	100.0000	0082.8	047.4	195.3	005.5000	0316.2	115.7	39.0
357.0	100.0000	0081.6	047.1	194.9	005.5000	0316.2	115.6	39.0
358.0	100.0000	0080.3	046.8	194.4	005.5000	0315.8	115.7	39.0
359.0	100.0000	0078.8	046.5	194.0	005.5000	0315.8	115.8	39.0
000.0	100.0000	0077.5	046.2	193.6	005.5000	0315.8	115.8	39.0
001.0	100.0000	0076.3	045.9	193.2	005.5000	0312.8	115.9	38.8
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003.0	100.0000	0073.6	045.3	192.3	005.5000	0306.3	116.2	38.6
004.0	100.0000	0071.8	044.9	191.9	005.5000	0306.3	116.5	38.5
005.0	100.0000	0070.2	044.5	191.5	005.5000	0306.3	116.8	38.4
006.0	100.0000	0068.7	044.2	191.1	005.5000	0300.0	117.0	38.2
007.0	100.0000	0067.3	043.9	190.7	005.5000	0300.0	117.3	38.2
008.0	100.0000	0066.0	043.6	190.4	005.5000	0294.4	117.6	38.0
009.0	100.0000	0064.4	043.2	190.0	005.5000	0294.4	117.9	37.9
010.0	100.0000	0062.6	042.7	189.6	005.5000	0294.4	118.4	37.8
011.0	100.0000	0060.5	042.2	189.3	005.5000	0291.3	118.9	37.6
012.0	100.0000	0058.4	041.7	188.9	005.5000	0291.3	119.5	37.5
013.0	100.0000	0056.4	041.1	188.6	005.5000	0291.3	120.1	37.3
014.0	100.0000	0054.7	040.6	188.3	005.5000	0289.3	120.7	37.1
015.0	100.0000	0053.1	040.1	188.0	005.5000	0289.3	121.3	37.0
016.0	100.0000	0051.6	039.5	187.7	005.5000	0289.3	121.9	36.9
017.0	100.0000	0050.0	039.0	187.4	005.5000	0286.3	122.5	36.7

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EXHIBIT B5

Predicted contour:

N. Lat. = 34 55 13 - Tabulated Protected and Interfering Contour Data
W. Lng. = 110 07 53 - KZUA Radio Station - Holbrook, Arizona

HAAT and Distance to Contour - NGDC 30 Second terrain database									
Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	40-F1	54-F1	100-F1
000	1595.9	77.5	100.0000	20.00	1.000	46.20	142.48	75.92	5.12
010	1610.8	62.6	100.0000	20.00	1.000	42.74	139.76	72.52	4.61
020	1627.6	45.8	100.0000	20.00	1.000	37.45	135.73	67.27	3.92
030	1630.0	43.4	100.0000	20.00	1.000	36.53	135.02	66.27	3.81
040	1623.1	50.3	100.0000	20.00	1.000	39.10	136.98	68.95	4.13
050	1608.1	65.3	100.0000	20.00	1.000	43.40	140.27	73.19	4.71
060	1596.4	77.0	100.0000	20.00	1.000	46.09	142.39	75.82	5.10
070	1588.5	84.9	100.0000	20.00	1.000	47.81	143.78	77.43	5.37
080	1591.3	82.1	100.0000	20.00	1.000	47.20	143.29	76.87	5.27
090	1594.8	78.6	100.0000	20.00	1.000	46.45	142.68	76.16	5.16
100	1597.5	75.9	100.0000	20.00	1.000	45.83	142.19	75.57	5.06
110	1602.1	71.3	100.0000	20.00	1.000	44.81	141.38	74.58	4.91
120	1601.2	72.2	100.0000	20.00	1.000	45.01	141.54	74.78	4.94
130	1591.5	81.9	100.0000	20.00	1.000	47.17	143.26	76.83	5.27
140	1575.5	97.9	100.0000	20.00	1.000	50.46	146.02	79.88	5.78
150	1572.3	101.1	100.0000	20.00	1.000	51.09	146.58	80.47	5.88
160	1590.1	83.3	100.0000	20.00	1.000	47.48	143.51	77.13	5.32
170	1608.4	65.0	100.0000	20.00	1.000	43.32	140.21	73.11	4.70
180	1619.8	53.6	100.0000	20.00	1.000	40.22	137.83	70.04	4.27
190	1623.8	49.6	100.0000	20.00	1.000	38.84	136.79	68.70	4.09
200	1627.2	46.2	100.0000	20.00	1.000	37.59	135.83	67.42	3.94
210	1620.9	52.5	100.0000	20.00	1.000	39.85	137.55	69.69	4.23
220	1604.2	69.2	100.0000	20.00	1.000	44.31	140.99	74.09	4.84
230	1588.9	84.5	100.0000	20.00	1.000	47.73	143.71	77.35	5.35
240	1574.8	98.6	100.0000	20.00	1.000	50.61	146.15	80.02	5.81
250	1559.1	114.3	100.0000	20.00	1.000	53.37	148.83	82.70	6.26
260	1555.7	117.7	100.0000	20.00	1.000	53.90	149.42	83.26	6.34
270	1565.6	107.8	100.0000	20.00	1.000	52.29	147.73	81.62	6.08
280	1584.3	89.1	100.0000	20.00	1.000	48.71	144.51	78.26	5.50
290	1573.7	99.7	100.0000	20.00	1.000	50.82	146.34	80.21	5.84
300	1578.6	94.8	100.0000	20.00	1.000	49.87	145.49	79.33	5.69
310	1586.3	87.1	100.0000	20.00	1.000	48.29	144.17	77.87	5.44
320	1606.0	67.4	100.0000	20.00	1.000	43.89	140.66	73.68	4.78
330	1611.0	62.4	100.0000	20.00	1.000	42.69	139.72	72.47	4.60
340	1599.9	73.5	100.0000	20.00	1.000	45.30	141.77	75.06	4.98
350	1590.8	82.6	100.0000	20.00	1.000	47.33	143.39	76.98	5.29

AMSL= 1673.4 M