

Southwestern Trails Technologies, Inc.

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Burt Broadcasting - Alamogordo, NM

Exhibit 1

ENGINEERING STATEMENT

**REQUEST FOR EXPEDITED PROCESSING – CORRECTION
OF GEOGRAPHIC COORDINATES AND OTHER
TECHNICAL SPECIFICATIONS – RECENDING OF
SPECIAL OPERATING CONDITION OR RESTRICTION #1**

SUMMARY OF MODIFICATION REQUEST CIRCUMSTANCES

KZZX is licensed to Burt Broadcasting, Inc. It is presently operating as a Class A on FM Channel 288. There presently exists a Construction Permit for KZZX to operate on FM Channel 287 as a Class C3 facility.

Construction Permit BPH-20040624ABL granted December 23, 2004 approved the change of KZZX from a Class A on Channel 288 (105.5 MHz) to Channel 287 (105.3 MHz) and relocation to coordinates 32 deg 49 min 40 sec N by 105 deg 53 min 40 sec W.

I have been contracted to build the KZZX facility which was authorized under this Construction Permit (CP).

The equipment to accomplish this construction is on order and will be on site on or about Dec. 5, 2007. This would normally provide plenty of time to construct the facility before the expiration of the CP.

As a result of crowding on the tower on which this stations was to be constructed at the Long Ridge Communications Site in the Lincoln National Forest, it was decided to relocate to an adjacent tower which is approximately 30 meters from the intended tower.

While preparing to file a modification to relocate to this adjacent tower, I discovered that there is an error in the geographic coordinates listed on the referenced CP.

A check of topographic maps indicates the coordinates on the CP are for a site that is 0.789 km away from the intended site on a bearing of 71.23 deg (T).

The site as listed on the CP is down the side of a mountain. There is a substantial difference in AMSL height between the two sites which produces a difference in HAAT as well. There is no tower at the site specified on the CP.

Attached **Exhibit 1-A** depicts on the USGS Alamogordo South (NM) Quadrangle Map the relative locations of the authorized site and the intended site.

Since I was not involved until very recently in this project, I do not know the source of the error. I do know that Burt Broadcasting, Inc. is ready and able to move forward and construct this facility at the Long Ridge Communications Site.

Attached as **Exhibit 1-B** is a new FM Channel Spacing Study to demonstrate that the location specified in this requested modification to relocate on the tower adjacent to the originally intended tower is fully compliant with spacing requirements.

Further, since this facility required Mexican Concurrence, please take note that the facility modification as proposed will produce virtually identical signal contours to that of the facility as authorized on the CP. The modification will actually INCREASE the spacing with Mexico. Please, reference spacing to XHIM FM, C. Juarez, CH, MX. The spacing will increase by 0.5 km when compared to the spacing listed in the original application for Construction Permit in FCC 301 – Exhibit 1, Figure 2. (a copy of which is attached to this filing as Exhibit 1 – C). Checking the spacing with a vacant allocation at El Porvenir, CH, MX increases by 0.2 km. Thus, this modification can be made without any negative impact on Mexican broadcast facilities existing or proposed.

Attached Exhibit - 2 modifies the original applications Exhibit - II. As originally Proposed, the KZZX facility would be co-located with a future expansion of KYEE which is co-owned by the licensee of KZZX, Burt Broadcasting, Inc.

The KYEE facility has been authorized under CP BPH-20040624ABJ granted April 24, 2007. The permittee is going to have to request a modification of that CP as well since it also specifies the wrong coordinates. FURTHER, that facility can not be constructed at the same site as KZZX since that site is located on the Long Ridge Communications Site in the Lincoln National Forest. The U S Forest Service restricts transmitters on that site to a maximum 1 kW of Transmitter Output Power. That modification will come later since that CP does not expire until April, 2010.

Therefore, the RF radiation issues for KZZX as modified, change markedly for the better. So much so that, the licensee of KZZX respectfully requests that Special Operating Condition or Restriction #1, suspending Automatic Program Test Authority be stricken from the modified CP if granted.

Special Operating Condition or Restriction #2 requiring coordination with other Site users will be complied with by the applicant.

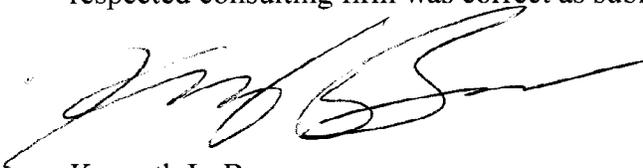
As now proposed in this modification, the KZZX C3 facility will be the only full power FM located on the tower at the coordinates applied for in this modification. It will be in full compliance with RF levels for controlled/occupational human exposure limits.

RF levels will exceed those specified for uncontrolled/general population limits by 15%. Referenced Exhibit - 2 includes a detailed justification of measures and circumstances which the applicant believes renders the RF radiation to be at levels that are acceptable under the rules.

THEREFORE, on behalf of the licensee, Burt Broadcasting, Inc., I respectfully request that this application for modification of CP BPH-20040624ABL be processed on a priority basis so that the facility can be constructed by me and my associates to increase the level of service provided to Alamogordo, NM by station KZZX.

I point out that the need for this request for expedited processing is the result of an error that is clearly not the fault of the FCC? I also believe, also, that it is not the fault of the permittee since the coordinates listed in the CP are for a site off the side of a mountain with no access by road, no power and no tower. Since it is in the Lincoln National Forrest, no tower could be built at these coordinates since they are not within the designated boundaries of the Long Ridge Communications Site.

I apologize for the late submission of this request and regret that I did not earlier question the site as authorized, but, trusted that the application previously submitted by a respected consulting firm was correct as submitted.



Kenneth L. Bass
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