



INDEPENDENT BROADCAST CONSULTANTS, INC.

110 COUNTY RD. 146,
TRUMANSBURG, N.Y. 14886-9721
(607) 273-2970

May 9, 2011

Mr. Dan J. Alpert, Esq.
The Law Office of Dan J. Alpert
2120 North 21st Road, Suite 400
Arlington, VA 22201

In Re: Eastern Sierra Broadcasting
Proposed NEW(AM), Reno, NV
Facility ID No: 160544
File No: BNP-20080602BQY

Dear Mr. Alpert:

This letter serves as the CERTIFICATION that I, Robert A. Lynch, staff engineer with Independent Broadcast Consultants, Inc., Trumansburg, New York, the engineering consultant firm of record for Eastern Sierra Broadcasting ("ESB"), has undertaken and completed this date a thorough Census Block Population Study for the above-referenced NEW AM Broadcast Station Application at Reno, Nevada.

The purpose of this study was to address the issue raised previously by Federal Communications Commission ("FCC") staff as to whether the applicant's proposed Nighttime Interference-Free ("NIF") contour would cover at least eighty per cent (80%) of the population of Reno (city), Nevada in compliance with Section 73.24(i) of the Commission's Rules. (See staff letter of March 2, 2011.)

Based on the completed analysis and the proposed amended 950 watt (0.95 kW.) directional nighttime pattern advanced in ESB's May 2, 2011 minor technical amendment to application BNP-20080602BQY, I have determined that the amended proposal's NIF contour Satisfies the nighttime coverage requirement of Section 73.24(i).

To be specific, the Census Block Population Study calculates that the amended proposal's NIF contour of 11.452 mV/m would cover 89.6 per cent of the Reno (city) 2000 U.S. Census population.

At the outset, it should be noted that Census Tract and Block Group population data is available from the more recent 2010 U.S. Census based on the 2011 on-line release from the U.S. Census Bureau. However, the accompanying maps required for a Block Study of this type have not yet been released. Census Bureau staff advise this company that completion and on-line release of said maps is at least several months away. And since the new 2010 data tabulations often refer to Census Tracts and Block Groups which differ from those listed in the 2000 Census, the newer block data is impossible to accurately utilize at present. Therefore, use of the 2000 Census data and maps serves as the only practical alternative.

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To undertake this Census Block Population Study, the undersigned first identified which of the Census Tracts covering Washoe County, Nevada, the county in which Reno is situated, contained portions of Reno city, in whole or in part. A total of 45 Census Tracts containing as many as 142 Block Groups were identified. Examination was then made to determine which blocks within each Tract or Block Group were located within Reno city limits. (The boundaries of Reno are highly irregular, and many Block Groups constitute a hybrid between city and non-city locations.) The proposed amended ESB application's NIF contour was then overlaid upon a computerized street map of Reno and determinations made as to whether each pertinent block received interference-free nighttime coverage. The exhaustive study consumed several weeks of staff time.

All data and maps were accessed through the Census Bureau's on-line American FactFinder service. On rare occasions, American FactFinder maps would be at odds over whether a particular block would stand inside or outside Reno city limits. Given that discrepancy, our firm's calculation of Reno city 2000 population, namely 180,038 persons, falls slightly under the Census Bureau's official 2000 Census tally of 180,480. This difference of 442 persons, one-quarter of one per cent of the total, is viewed as insignificant. The error, if on our part, was impossible to resolve. Should a Census Block within Reno be predicted to receive only partial NIF coverage, that block's population was apportioned based on the percentage of area within the NIF contour.

After all pertinent Census Tracts and Block Groups were considered, the results were as follows:

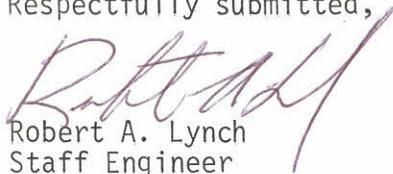
Block Population Total for Reno, Nevada:	<u>180,038 persons</u>
Population receiving NIF Coverage within Reno, Nevada Population Blocks:	<u>161,301 persons</u>
Percentage of NIF Coverage from Proposed:	<u>89.593 %</u>

[Block-by-block calculations will be made available upon the Commission's request.]

The conclusion from this study is that the pending application by Eastern Sierra Broadcasting for a New AM broadcast station at Reno, NV, File No: BNP-20080602BQY, as Amended by engineering filed May 2, 2011, stands in FULL COMPLIANCE with the Nighttime Interference-Free coverage requirements of Section 73.24(i) of the Rules.

For the record, the undersigned has served as a staff engineer for Independent Broadcast Consultants, Inc. for more than 24 years, has assisted and submitted numerous broadcast engineering applications on behalf of this company's clients, and has undertaken numerous population coverage studies, the results of which have been accepted by the Federal Communications Commission with authorizations subsequently granted.

Respectfully submitted,


Robert A. Lynch
Staff Engineer