

Engineering Statement in Support of Change to the Community of License

Introduction

Educational Media Foundation requests a community of license change for NEW from Hotchkiss, CO to Colona, CO.

This statement is included to show that the proposed move to the station NEW will comply with the 307(b) fair distribution guidelines.

Discussion

The FCC describes several points that are required for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b). Those requirements have been divided into the two sections below:

1. Minimum Requirements

The commission has requested that any 307(b) showing contain the following minimum information:

- The number of stations licensed to the current community of license is 0. The number of stations licensed to the proposed community of license is 1.
- The number of stations providing service to the current community of license is 10. The number of stations providing service to the proposed community of license is 10.
- The population of the proposed community of license is 30.
- Currently, the AM station of KAVP is licensed to the community of Colona, Colorado. Therefore, Colona, Colorado is a licensable community.

2. Other Relevant Information

A. Service Area

There is no tower site for station NEW currently located at the coordinates of 38-46-03 N by 107-42-17 W, nor is there a known plan for one to be built. However, in order to show that a maximum classed facility at the current allotted coordinates will be served when the proposed move is granted, several exhibits have been attached.

- Exhibit 35-A shows all facilities that serve any portion of the maximum class contour of the current NEW construction permit's coverage area. See Exhibit 35-A1 for a corresponding station list.
- Exhibit 35-B is similar to Exhibit 35-A, however contours that combine to provide at least 4 services over the entire current maximum class contour area remain while the extraneous contours have been removed. Exhibit 35-

B1 provides a report of the number of stations that completely cover the service area and those that provide at least partial coverage to the area. As can be seen the entire area is well served by 4 stations, not including NEW.

B. Gain/Loss

The proposed move to NEW will make more efficient use of the FM spectrum and increase service to the public, as it will result in an increase in population served as illustrated Exhibit 35-C.

- Exhibit 35-C is a population report of the maximum class facility for NEW and the proposed facility for NEW. As can be seen, the current facility theoretically would serve an area of 2,100 sq. km and a population of 30,740 persons. The proposed facility serves an area of 1,636 sq. km and a population of 32,414 persons.

Therefore, although there is an overall loss of 22% (464 sq. km) of the area served, the population served increases by 5% (1,674 persons).

C. Number of Aural Services

The proposed move to NEW will result in preferential arrangement of facilities. This facility will provide Colona, Colorado with its first FM Broadcast local aural transmission.

Conclusion

The entire area within the maximum classed contour of NEW continues to be served should the proposed facility be granted. Further it is in the public interest to grant the proposed facility since it will result in both an increase in population served and a first FM service to Colona.

Respectfully submitted,

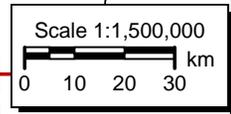
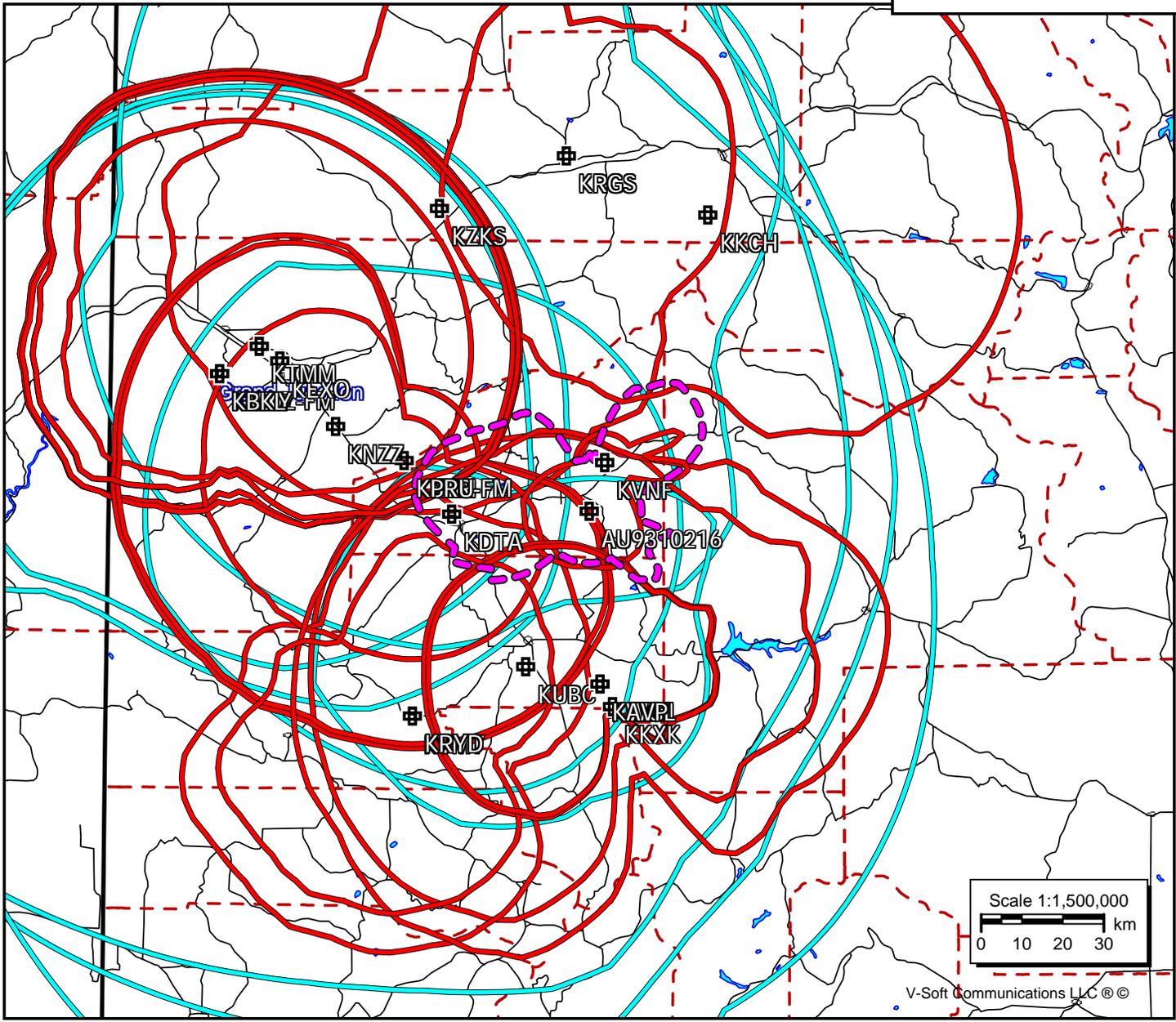


Cristina Baron
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Educational Media Foundation
May 29, 2012

Exhibit 35-A

AU9310216
RM11105
Latitude: 38-46-03 N
Longitude: 107-42-17 W
ERP: 25.00 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 2019.235 m
Elevation: 1716.36 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

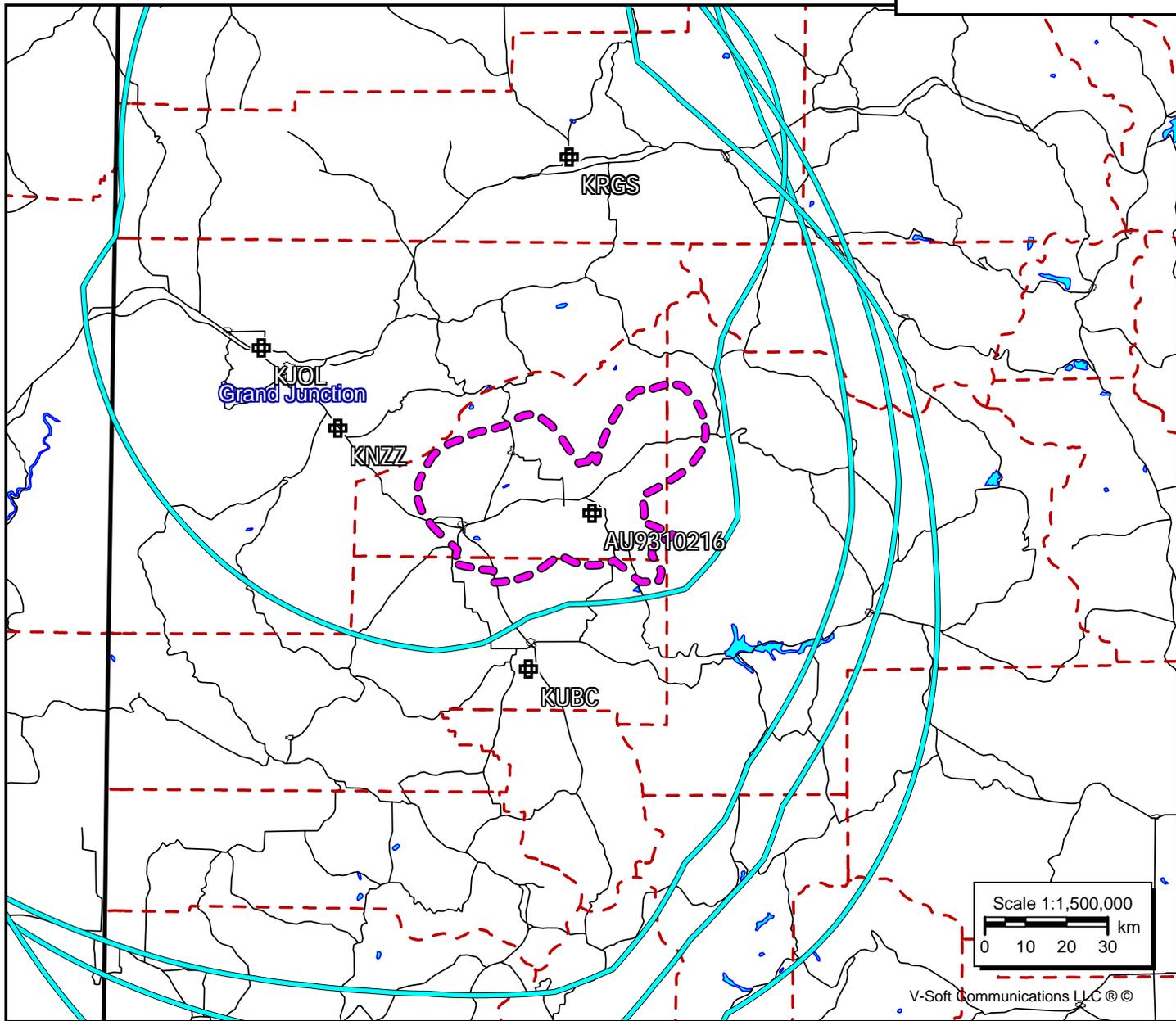
- Contours
- AM Contour
 - FM Contour



Call	Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
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AU9310216	VAC		258	A	C3	Hotchkiss	CO	No	25.0
KPRH	LIC		202	M	C1	Montrose	CO	No	3.5
KVMT	LIC		206	M	C1	Montrose	CO	No	8.0
KTMH	LIC		210	M	C1	Montrose	CO	No	4.0
KVNF	LIC		215	M	A	Paonia	CO	No	2.6
KJYE	LIC		222	M	C	Grand Junction	CO	No	100.0
KKCH	LIC		224	M	C	Glenwood Springs	CO	No	56.0
KMGJ	LIC		226	M	C0	Grand Junction	CO	No	100.0
KKXK	LIC		231	M	C	Montrose	CO	No	100.0
KKNN	LIC		236	M	C0	Delta	CO	No	100.0
KSTR-FM	LIC		241	M	C0	Montrose	CO	No	100.0
KEKB	LIC		260	M	C	Fruita	CO	No	79.0
KMOZ-FM	LIC		264	M	C1	Grand Junction	CO	No	30.0
KPRU	LIC		277	M	C2	Delta	CO	No	12.0
KSNN	LIC		279	M	C2	Ridgway	CO	No	4.1
KMXV	LIC		282	M	C0	Grand Junction	CO	No	100.0
KRYD	LIC		285	M	C1	Norwood	CO	No	24.0
KZKS	LIC		287	M	C	Rifle	CO	No	60.0
KWGL	LIC		289	M	C	Ouray	CO	No	60.0
KBKL	LIC		300	M	C	Grand Junction	CO	No	100.0
KUBC			580			MONTROSE	CO		
KAVP			1450			COLONA	CO		
KNZZ			1100			GRAND JUNCTION	CO		
KDTA			1400			DELTA	CO		
KRGS			690			RIFLE	CO		
KJOL			620			GRAND JUNCTION	CO		
KEXO			1230			GRAND JUNCTION	CO		
KTMM			1340			GRAND JUNCTION	CO		

Exhibit 35-B

AU9310216
RM11105
Latitude: 38-46-03 N
Longitude: 107-42-17 W
ERP: 25.00 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 2019.235 m
Elevation: 1716.36 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None



Reference Area: AU9310216 (258): FCC F(50-50) 70.00 dBu (FCC HAAT)

Contours that completely cover the reference area (4):

- KUBC : Imported: 0.5 mV/m
- KNZZ : Imported: 0.5 mV/m
- KRGS : Imported: 0.5 mV/m
- KJOL : Imported: 0.5 mV/m

Contours that partially cover the reference area (23):

- KPRH (202) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KVMT (206) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KTMH (210) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KVNF (215) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KJYE (222) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KKCH (224) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KMGJ (226) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KKXK (231) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KKNN (236) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KSTR-FM (241) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KEKB (260) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KMOZ-FM (264) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KPRU (277) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KSNN (279) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KMXV (282) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KRYD (285) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KZKS (287) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KWGL (289) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KBKL (300) : FCC F(50-50) 70.00 dBu (FCC HAAT)
- KAVP : Imported: 0.5 mV/m
- KDTA : Imported: 0.5 mV/m
- KEXO : Imported: 0.5 mV/m
- KTMM : Imported: 0.5 mV/m

Exhibit 35-C

Population Report

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
of Radials Calculated: 360
FCC Matching HAAT Calculation Used
Field Strength: 70.00 dBuV/m
Primary Terrain: V-Soft 30 Second US Database
Secondary Terrain: V-Soft 3 Second US Terrain
Population Database: 2010 US Census (PL)

Transmitter Information:

Call Letters: NEW
Latitude: 38-23-15 N
Longitude: 107-40-26 W
ERP: 0.85 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 2904.0 m
Elevation: 2860.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Population Summary:

Total Population Within Contour: **32,414**
Total Area Within Contour: **1,636 sq. km**

Population Report

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
of Radials Calculated: 360
FCC Matching HAAT Calculation Used
Field Strength: 70.00 dBuV/m
Primary Terrain: V-Soft 30 Second US Database
Secondary Terrain: V-Soft 3 Second US Terrain
Population Database: 2010 US Census (PL)

Transmitter Information:

Call Letters: AU9310216
File Number: RM11105
Latitude: 38-46-03 N
Longitude: 107-42-17 W
ERP: 25.00 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 2019.235 m
Elevation: 1716.36 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Population Summary:

Total Population Within Contour: **30,740**
Total Area Within Contour: **2,100 sq. km**