

Engineering Statement  
On behalf of Spokane Public radio, Inc  
BNPFT-20130822AFA  
Coeur d'Alene

Reference is made to the Petition to Deny the application filed by Spokane Public Radio, Inc (SPR) by QueenB Radio Inc. (QB) It should be made clear that this application meets all the contour protection requirements found under Section 74.204 (1) - (3). The SPR application causes no contour overlap to any existing license, construction permit, application, reservation or allocation. Further, the proposal complies with the FCC's new rules with regard to protection to frequencies that are available for LPFM operations.

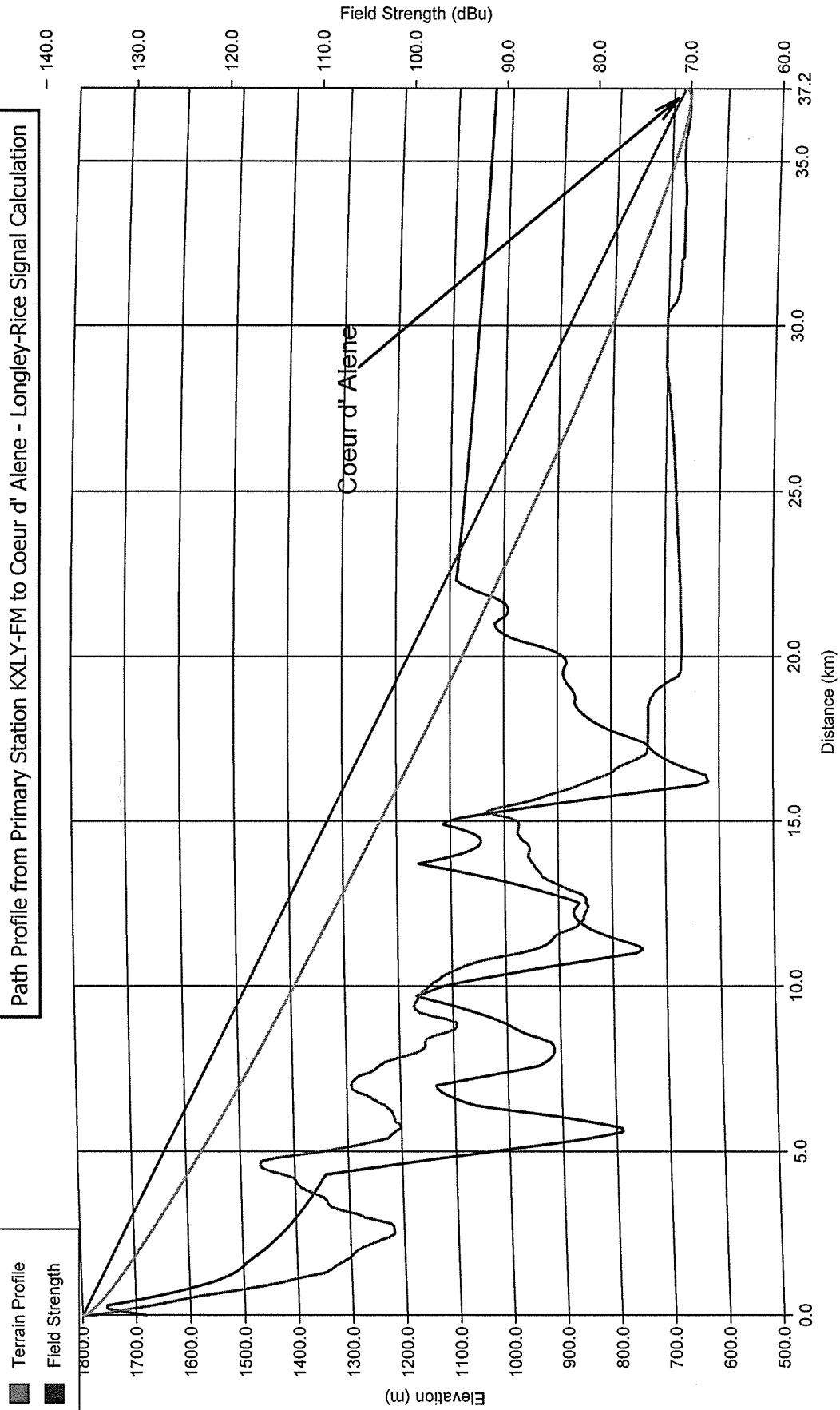
QB claims the proposed SPR translator will cause interference to the reception of K262AG, owned by Spokane Radio, Inc. and licensed to Spokane, Washington. As evidence, it submits a series of emails written by its listeners supposedly within the 60 dBu of the proposed SPR service contour, surprisingly all with exactly the same date and most with identical sentences. However, QB fails to provide a reasonable technical showing or explanation that any of these listeners will receive actual interference in the Coeur d' Alene area. QB fails to show the location of the listeners who sent the emails thus leaving the reader to wonder whether they are within the proposed SPR service contour.

Furthermore, the K262AG licensed primary station, KXLY-FM , is a class C station operating from an HAAT of 914 meters with a power of 39 kW. The path from the KXLY-FM antenna to Coeur d' Alene is completely unobstructed as the reader can see from attachment #1 to this statement. Based on Longley-Rice analysis, the signal strength at Coeur d' Alene is 92 dBu. Using FCC methodology, the signal strength at Coeur 'd Alene is predicted to be 80 dBu. With this kind of signal from the primary station, one wonders why a QB translator is needed at all, except to monopolize the airways.

Attachment #2 is a map of the KXLY-FM 60 and 80 dBu FCC contours. The K262AG 60 dBu contour is also shown on the map. This map shows the distance between the translator and the area where QB claims it has listeners. Attachment #3 is a Profile Path between K262AG and Coeur 'd Alene showing that there is a mountain range between the two locations and the signal at Coeur 'd Alene is only 10 dB, far below the typical level needed for translation.

Consequently, QB's claims of interference are unproven and K262AG has a direct signal level at Coeur d 'Alene that is not adequate for regular listening, however the licensed primary station KXLY-FM has a very strong signal at Coeur 'd Alene. QB's Petition should be dismissed.

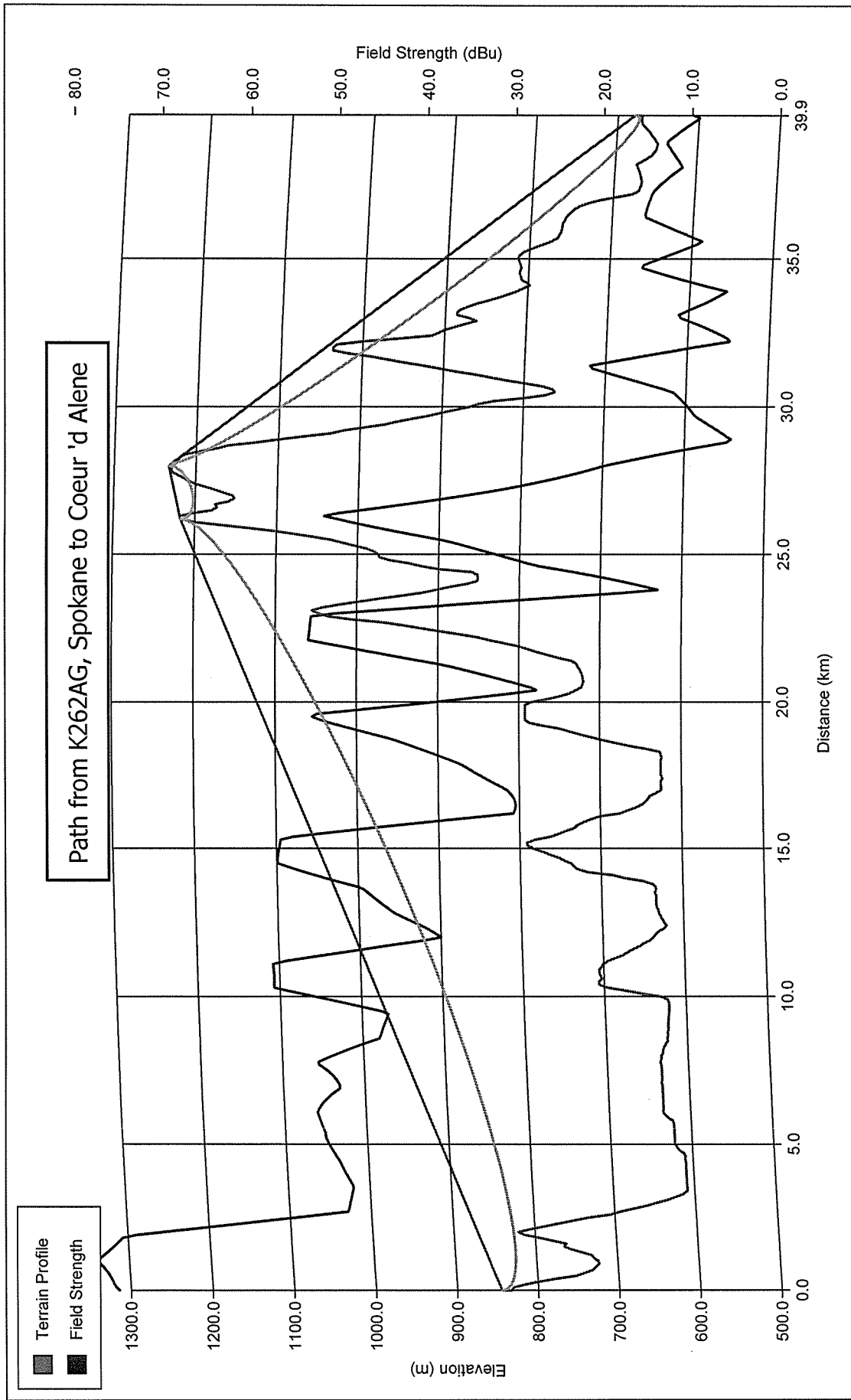
# Path Profile from Primary Station KXLY-FM to Coeur d' Alene - Longley-Rice Signal Calculation



Start Latitude: 47-55-18 N  
Start Longitude: 117-06-48 W

End Latitude: 47-40-33.07 N  
End Longitude: 116-46-34.05 W

Distance: 37.22 km  
Bearing: 137.13 deg



Start Latitude: 47-37-43 N  
Start Longitude: 117-18-48 W

End Latitude: 47-40-44.41 N  
End Longitude: 116-47-15.63 W

Distance: 39.89 km  
Bearing: 81.73 deg

**KXLY-FM**

BMLH19971023KH  
Latitude: 47-55-18 N  
Longitude: 117-06-48 W  
ERP: 37.00 kW  
Channel: 260  
Frequency: 99.9 MHz  
AMSL Height: 1813.0 m  
Elevation: 1792.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

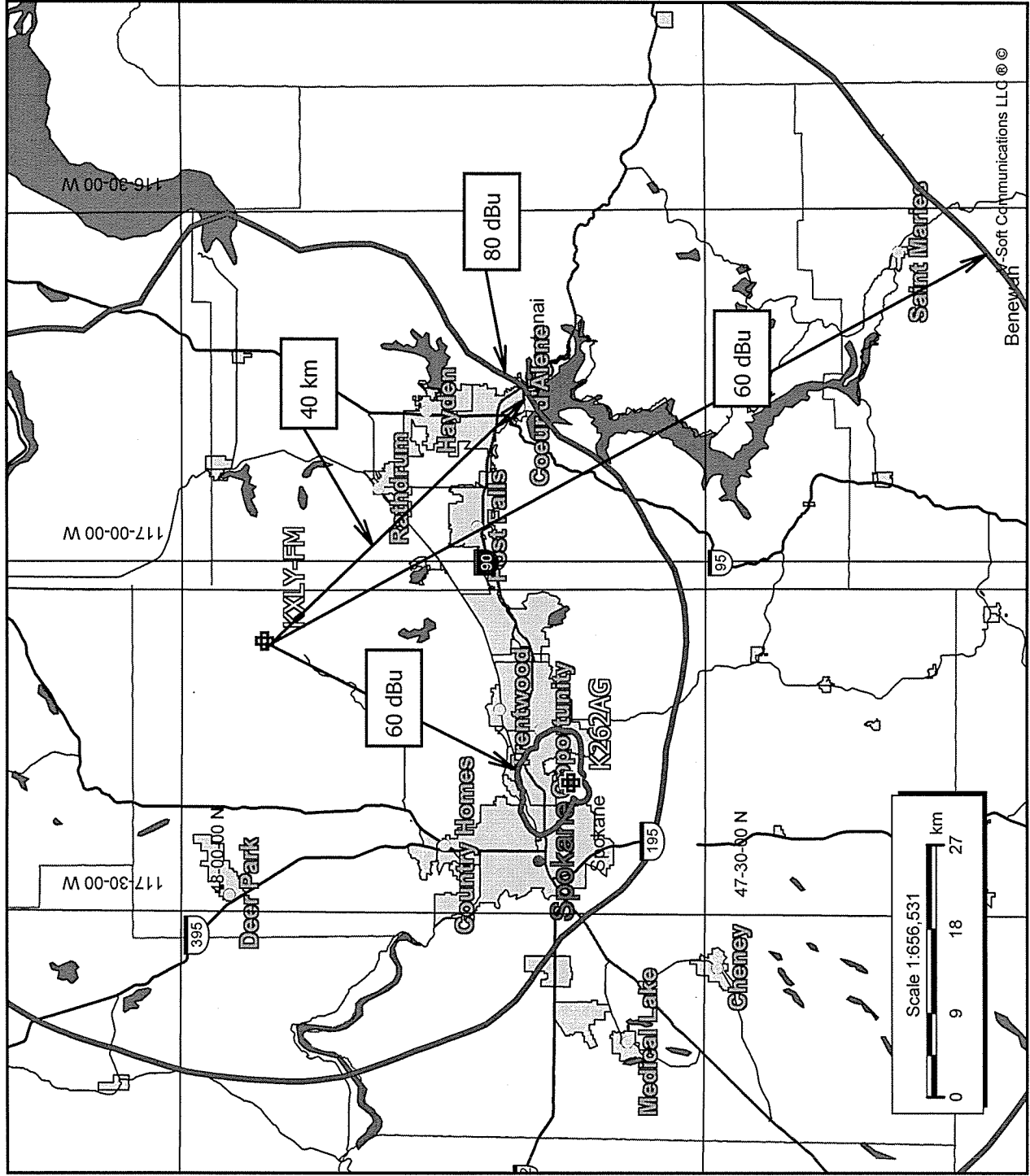
**K262AG**

BLFT19980323TD  
Latitude: 47-37-43 N  
Longitude: 117-18-48 W  
ERP: 0.003 kW  
Channel: 262  
Frequency: 100.3 MHz  
AMSL Height: 853.0 m  
Elevation: 841.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No

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**Declaration:**

I, Douglas L. Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 30 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

That, I am certified as a Life-Time Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Re-certified 1/2010)

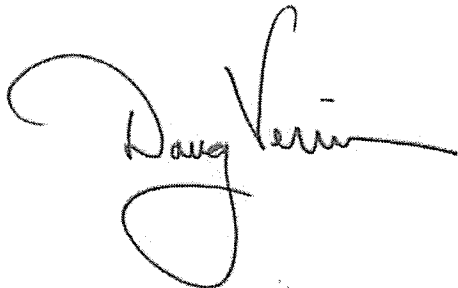
That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by the Spokane Public radio Inc. to prepare the engineering showings appended hereto:

That, I have prepared these broadcast engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

That, under penalty of perjury, I declare that the foregoing is correct.

Douglas L. Vernier

A handwritten signature in black ink, appearing to read "Doug Vernier", with a large, stylized loop at the end.

Executed of September 30, 2013