

ENGINEERING STATEMENT IN SUPPORT OF  
REQUEST FOR SPECIAL TEMPORARY AUTHORITY  
New Rushmore Radio, Inc.  
Rapid City, SD

This engineering exhibit supports a request for special temporary authority (“STA”) to permit the signal of KKLS(AM) - Rapid City, South Dakota to be rebroadcast by FM Translator K248BT (formerly K258AJ) - Rapid City, South Dakota pursuant to the new rules which have been adopted in MB Docket 07-172, but which are not yet effective, to permit FM translators to rebroadcast the signals of AM stations.

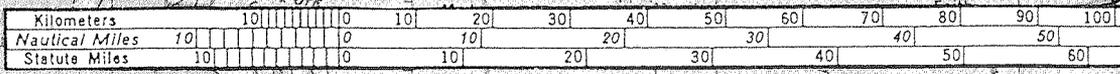
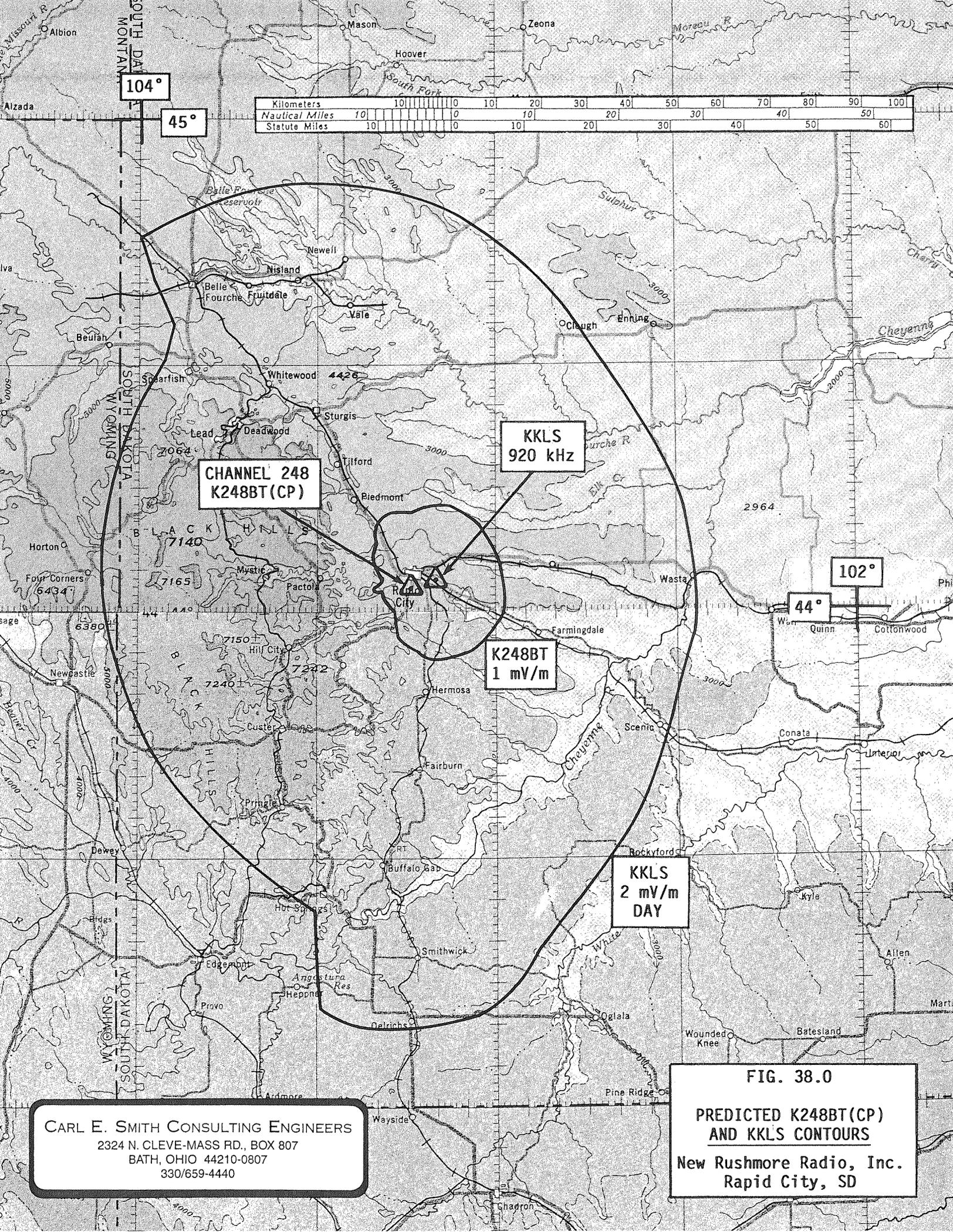
K248BT is presently licensed to operate on Channel 258, but holds a construction permit (BPFT-20090506AAV) authorizing operation on FM Channel 248 with a nondirectional effective radiated power of 180 watts.<sup>1</sup> Figure 38.0 is a map exhibit depicting the predicted K248BT 1 mV/m contour, which was projected using the operating facilities authorized by the above referenced construction permit and terrain data from the NGDC 30 second terrain database. This map exhibit also depicts the predicted 2 mV/m daytime contour for KKLS, which was projected based on the licensed KKLS daytime operating facilities using conductivity data from FCC Figure M3. As shown in this map exhibit, the predicted K284BT 1 mV/m contour is contained wholly within the predicted KKLS 2 mV/m daytime contour.<sup>2</sup>

Based on the above information, it is obvious that the use of K248BT to retransmit the signal of KKLS would comply with the rules adopted in the *Report and Order* in MB Docket 07-172, which will permit FM translators to rebroadcast the signals of AM stations once they become effective. Furthermore, since no change is proposed in the authorized K284BT transmitting facilities, it is obvious that the grant of the requested special temporary authority will comply with the FCC standard regarding human exposure to nonionizing radiation with regard to both general public exposure and occupational exposure.

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<sup>1</sup>A license application to cover this construction permit is being filed in conjunction with the submission of this request for special temporary authority.

<sup>2</sup>It is also obvious from an examination of this map exhibit that the predicted K284BT 1 mV/m contour is located wholly within a 25 mile radius of the KKLS transmitter site.



**CHANNEL 248  
K248BT(CP)**

**KKLS  
920 kHz**

**K248BT  
1 mV/m**

**KKLS  
2 mV/m  
DAY**

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**FIG. 38.0**  
**PREDICTED K248BT(CP)**  
**AND KKLS CONTOURS**  
 New Rushmore Radio, Inc.  
 Rapid City, SD