

EXHIBIT 21

The KALC transmitter is located at an electronic site on Lookout Mountain near Golden, CO with the KALC FM antenna mounted on a multi-user tower. The tower has been registered with the FCC and assigned ASR number 1044149. The registered geographic coordinates, ground elevation and heights AGL and AMSL are inconsistent with those shown on the KALC license. This application supports a request for a construction permit to modify the KALC license to bring it into compliance with the technical parameters that have been registered by the owner of the tower.

There are no physical changes in the licensed operation of KALC. The revised license parameters include a correction in geographic coordinates of one second in latitude and four seconds in longitude. There is also a change in ground elevation, and radiation center above mean sea level and above average terrain.

The precise figures are listed in the associated Tech Box. The height above average terrain is recalculated from the new coordinates. Note that average terrain data was determined excluding four radials that extend primarily over the Rocky Mountains. See attached Appendix A. The Commission has recognized this method of calculating HAAT in previous cases involving stations in the Denver area. In the Second Report and Order in MM Docket No. 98-93 -- Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules, released Nov. 1, 2000, the Commission specifically recognized the need to prevent improper skewing of the antenna HAAT of stations in that area. It stated that it would continue to grant waivers of Section 73.313(d) to Class C stations located in mountainous areas by allowing radials extending primarily over the Rocky Mountains to be excluded for the purpose of calculating HAAT. FM stations KFMD, KKHK and KOSI located on Lookout Mountain are all licensed with heights established by excluding from the terrain calculations those radials extending over the Rocky Mountains. Accordingly, we respectfully request a waiver of Section 73.313(d) to exclude the terrain data on radials extending over the mountains from the corrected KALC antenna coordinates as shown in Appendix A.

**APPENDIX A
TERRAIN CALCULATIONS
KALC TRANSMITTER SITE
N 39° 43' 58" W 105° 14' 08"**

<u>RADIAL</u>	<u>AVERAGE TERRAIN</u>	<u>HAAT</u>
N 0°	1847 METERS	438 METERS
N 45°	1715 METERS	570 METERS
N 90°	1704 METERS	581 METERS
N 135°	1796 METERS	489 METERS
N 180°	2171 METERS	114 METERS
N 225°	2277 METERS	8 METERS
N 270°	2219 METERS	66 METERS
N 315°	2408 METERS	-123 METERS

Radiation Center AMSL 2285 Meters
Average Terrain 1766 Meters
Height Above Average Terrain 519 Meters

Radials 180 °, 225°, 270° and 315° that extend over the Rocky Mountains are excluded from the terrain calculations.

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