



2355 Ranch Drive, Westminster, CO 80234  
Phone: 303-465-5742 ~ Fax: 303-465-4067  
E-Mail: stcl@comcast.net

***B. W. St. Clair***

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### **Engineering Statement**

**KDUG-LP-D FI 128855**

The application is for a small station whose contour is completely contained within that of the previously Mexican-coordinated contour. Its placement allows the move of the station to remain within thirty miles of the original site. OET69 study shows no interference with other facilities and is compliant with 47.793 sections applicable. The mast is less than 6.1M tall and thus requires no registration. The NIER from the facility is less than 5% of the limit for this service. Mask filter is stringent and coordination with Mexico is not required because the previous permit has already been coordinated and this contour is contained within that contour.

Respectfully submitted,

B. W. St. Clair  
Engineering Consultant  
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