

## SPACING NARRATIVE

This exhibit is submitted to demonstrate that this proposal fully complies with the interference criteria set forth in Section 73.509 and 73.515 of the Commission's rules. Attached as exhibits are a spacing study and maps demonstrating clearly that there is no prohibited overlap between this proposal and any other FM services. The attached FM spacing study demonstrates that this proposal would be fully spaced even as a full power Class A FM station to all other FM facilities.

A map is included to show that 100 percent of the area the community of license, Tonopah, NV, is within the required 60 dBu contour

A scale of kilometers has been included on the maps. These maps were drawn to scale using the rfSoftware series of computer programs.

By: Kevin Fitzgerald, Chief Engineer

Kevin Fitzgerald  
 Job: New NCE FM Tonopah.fmj  
 Master Database: 2021\_Nov\_02.fmd  
 Lat: N38:04:18 Lon: W117:13:56 NAD-83  
 Channel: 210 Class: A  
 Status: Licensed, Construction Permit, Application  
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
 Range: 100 km  
 Comments: No Comments  
 Description: New NCE FM, 89.9, Tonopah, NV; Spacing Study

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 Date: 11/3/2021 10:01:25 PM  
 rfInvestigator Version 3.8.16  
 by rfSoftware, Inc.

| Callsign | Ser | City     | State | Latitude (NAD83) | Longitude (NA) | Channel     | Class | Stat | 73  | 207 | CIERP | HAAT  | Adjacen | Distanc | Bear   | 73  | 215    | CI |
|----------|-----|----------|-------|------------------|----------------|-------------|-------|------|-----|-----|-------|-------|---------|---------|--------|-----|--------|----|
| KQMC     | FM  | HAWTHORN | NV    | N38:27:28        | W118:45:56     | 211 : 90.1  | MC2   | LIC  | 106 |     | 34.85 | 0.00  | 957     | 1st Adj | 140.85 | 288 | 140.85 |    |
| KQNV     | FM  | FALLON   | NV    | N39:54:46        | W118:55:21     | 210 : 89.9  | MC1   | LIC  | 200 |     | 51.44 | 12.50 | 601     | Co-Chan | 251.44 | 324 | 251.44 |    |
| KEFR     | FM  | LE GRAND | CA    | N37:32:01        | W120:01:54     | 210 : 89.9  | MB    | LIC  | 178 |     | 75.66 | 1.80  | 653     | Co-Chan | 253.66 | 256 | 253.66 |    |
| KIBS     | FM  | BISHOP   | CA    | N37:25:00        | W118:11:03     | 264 : 100.7 | B     | LIC  | 15  |     | 96.01 | 1.00  | 902     | IF      | 111.01 | 229 | 96.01  |    |

# Contour Analysis

Kevin Fitzgerald  
Job: New NCE FM Tonopah COL.fmj  
Master Database: 2021\_Nov\_02.fmd  
Lat: N38:04:18 Lon: W117:13:56 NAD-83  
Scale: 1:200000  
Channel: 210 Class: A  
Status: Licensed, Construction Permit, Application  
Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
Range: 100 km, Clearance: -0.5km  
Comments: No Comments  
Description: New NCE FM, 89.9, Tonopah, NV; COL Study

rfInvestigator Version 3.8.16  
by rfSoftware, Inc.  
Date: 11/3/2021 9:58:44 PM  
Key:  
City Grade  
Protected  
Co-Channel  
1st Adj  
2nd/3rd Adj

