

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 but one other FM facility. The attached maps demonstrate that there is no prohibited contour overlap between this facility and the instant proposed FM NCE facility. Five NCE FM stations have also been included to better show no prohibited overlap. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The six facilities that have been included on the attached maps are: FID 767768, 90.5, Bishop, CA; FID 765532, 91.1, Ridgecrest, CA; KLXY, 90.5, Woodlake, CA; KTQX, 90.1, Bakersfield, CA; KPFK, 90.7, Los Angeles, CA; and KWBP, 90.1, Big Pine, CA.

A map is included to show that 100 percent of the area the community of license, Cartago, CA, 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 Cartago Amend.fmj

Master Database: 2021_Nov_03.fmd

Lat: N36:12:33 Lon: W117:59:57 NAD-83

Channel: 214 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, 90.7, Cartago, CA; Spacing Study; see contour study for detail.

Page 1 of 1

Date: 1/27/2022 1:23:08 AM

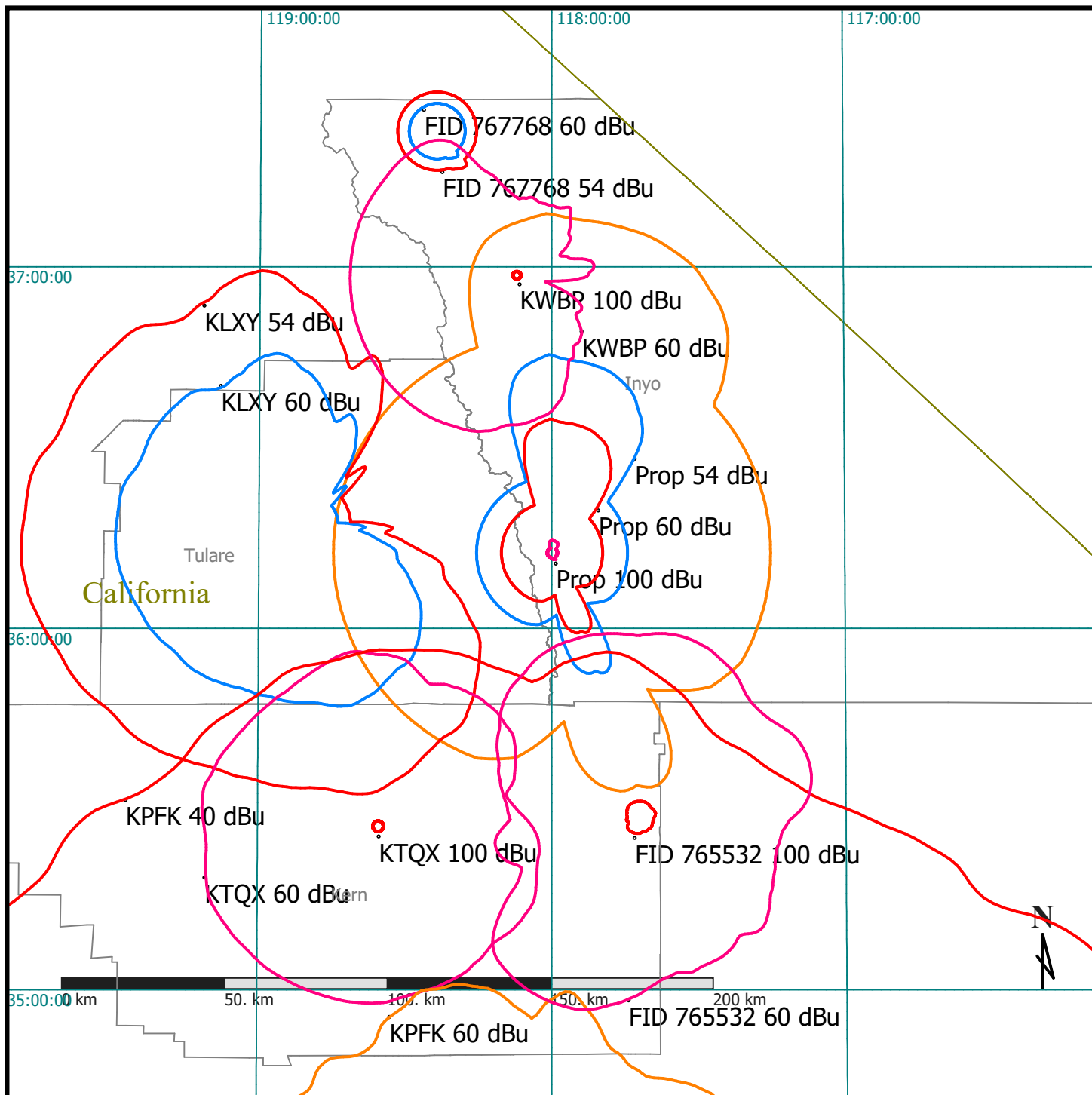
rfInvestigator Version 3.8.16
by rfSoftware, Inc.

| Callsign | Ser | City | State | Latitude (NAD83) | Longitude (NAD83) | Channel | Class | Stat | 73 | 207 | CIERP | HAAT | Adjacen | Distanc | Bear | 73 | 215 | CI |
|----------|-----|------------|-------|------------------|-------------------|----------------|-------|------|--------|-------|-------|---------|---------|---------|--------|----|-----|----|
| KLXY | FM | WOODLAKE | CA | N36:17:09 | W118:50:18 | 213 : 90.5 MB | LIC | 113 | -37.10 | 0.85 | 761 | 1st Adj | 75.90 | 276 | 75.90 | | | |
| KTQX | FM | BAKERSFIEL | CA | N35:27:11 | W118:35:28 | 211 : 90.1 MB | LIC | 69 | 30.51 | 0.57 | 1104 | 3rd Adj | 99.51 | 213 | 99.51 | | | |
| KFRB | FM | BAKERSFIEL | CA | N35:26:17 | W118:44:25 | 217 : 91.3 MB | LIC | 69 | 39.67 | 0.00 | 417 | 3rd Adj | 108.67 | 218 | 108.67 | | | |
| KPFK | FM | LOS ANGELE | CA | N34:13:45 | W118:04:06 | 214 : 90.7 MB | LIC | 178 | 41.77 | 110.0 | 863 | Co-Chan | 219.77 | 182 | 219.77 | | | |
| KFSR | FM | FRESNO | CA | N36:48:42 | W119:44:47 | 214 : 90.7 MA | LIC | 115 | 55.17 | 2.55 | 20 | Co-Chan | 170.17 | 293 | 170.17 | | | |
| KDOX | FM | BIG PINE | CA | N37:24:42 | W118:11:10 | 217 : 91.3 MB | LIC | 69 | 65.46 | 0.17 | 926 | 3rd Adj | 134.46 | 353 | 134.46 | | | |
| KGZO | FM | SHAFTER | CA | N35:16:51 | W119:44:56 | 215 : 90.9 MB | LIC | 113 | 75.82 | 1.90 | 631 | 1st Adj | 188.82 | 237 | 188.82 | | | |
| K217DA | FM | RIDGECREST | CA | N35:28:41 | W117:42:01 | 217 : 91.3 MDX | LIC | 0 | 85.52 | 0.01 | 374 | 3rd Adj | 85.52 | 162 | 85.52 | | | |
| KFNO | FM | FRESNO | CA | N37:04:25 | W119:25:56 | 212 : 90.3 MB | LIC | 69 | 91.05 | 2.20 | 594 | 2nd Adj | 160.05 | 307 | 160.05 | | | |
| KGFM | FM | BAKERSFIEL | CA | N35:26:17 | W118:44:25 | 268 : 101.5 B | LIC | 15 | 93.67 | 6.70 | 396 | IF | 108.67 | 218 | 93.67 | | | |
| K267CG | FM | PORTERVILL | CA | N36:05:46 | W119:03:08 | 267 : 101.3 DX | LIC | 0 | 95.59 | 0.00 | 0 | IF | 95.59 | 262 | 95.59 | | | |
| K214ED | FM | BENA | CA | N35:27:10 | W118:35:28 | 214 : 90.7 MDX | LIC | 0 | 99.54 | 0.00 | 1104 | Co-Chan | 99.54 | 213 | 99.54 | | | |

Contour Analysis

Kevin Fitzgerald
 Job: New NCE FM Cartago Amend.fmj
 Master Database: 2021_Nov_03.fmd
 Lat: N36:12:33 Lon: W117:59:57 NAD-83
 Scale: 1:1750000
 Channel: 214 Class: A
 Status: Licensed, Construction Permit, Application
 Channels:
 Range: 100 km, Clearance: -0.5km
 Comments: No Comments
 Description: New NCE FM, 90.7, Cartago, CA; Contour Study showing spacings to: FID 767768, Bishop; FID 765532, Ridgecrest; KLXY, Woodlake; KTQX, Bakersfield; KPFF, Los Angeles; and KWBP, Big Pine.

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 Date: 1/27/2022 1:19:24 AM
 Key:
 City Grade
 Protected
 Co-Channel
 1st Adj
 2nd/3rd Adj



Contour Analysis

Kevin Fitzgerald
Job: New NCE FM Cartago COL Amend.fmj
Master Database: 2021_Nov_03.fmd
Lat: N36:12:33 Lon: W117:59:57 NAD-83
Scale: 1:500000
Channel: 214 Class: A
Status: Licensed, Construction Permit, Application
Channels:
Range: 100 km, Clearance: -0.5km
Comments: No Comments
Description: New NCE FM, 90.7, Cartago, CA; COL Study

rfInvestigator Version 3.8.16
by rfSoftware, Inc.
Date: 1/27/2022 1:25:51 AM
Key:

City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

