

## **EXHIBIT 11**

Calvary Chapel of Twin Falls, Inc.

February 2004

Reason for Modification of K201DR, Sun Valley, NV BLFT-19970519TE, Facility ID #83363

Calvary Chapel of Twin Falls, Inc. ("CCTF") was notified by Educational Media Foundation, licensee of KLRH, Sparks, of plans to begin operation on Channel 202. K201DR, Sun Valley, operating on Channel 201, has ceased broadcasting and has requested Special Temporary Authority from the Commission to remain silent.

K201DR, Sun Valley, NV is a Class D noncommercial educational licensed FM radio broadcast station, as defined by CFR §74.1201 (e) as defined in §2.1, which states:

TITLE 47—TELECOMMUNICATION

CHAPTER I--FEDERAL COMMUNICATIONS COMMISSION

PART 2--FREQUENCY ALLOCATIONS AND RADIO TREATY MATTERS;

GENERAL RULES AND REGULATIONS--Table of Contents

Subpart A--Terminology

Sec. 2.1 Terms and definitions.

(a) Where a term or definition appears in this part of the Commission's Rules, it shall be the definitive term or definition and shall prevail throughout the Commission's Rules.

K201DR had been in operation since May 1997 and has been required to cease operations and is now required to change channel in order to continue operations. Due to a "freeze" in the reserved band, the only change available to K201DR is a minor change. A minor change according to FCC C.F.R. §74.1233 includes changes to first, second or third adjacent channels, or intermediate frequency channels, and any change in antenna location where the station would continue to provide 1 mV/m service to some portion of its previously authorized 1 mV/m service area. K201DR is not able to modify to channels 202,203 or 204 or IF channels 254 or 255. A modification to channels 202,203,204, 254 or 255 would create prohibited contour overlap with co-channel or first adjacent FM stations:

KLRH, Sparks, NV Channel 202

KUNR, Reno, NV Channel 204

K254AK, Reno, NV

CCTF is requesting to continue to serve the public, as has been done with K201DR since May 1997, by continuing operation on Channel 200, according to CFR Subpart C – Noncommercial Educational FM Broadcast Station §73.501(a) footnote (1) and specific standards governing its use as contained in §73.512.

**1) Compliance with §74.1204 & §74.1205:**

Operation on Channel 200 would involve Contour Overlap of KLRH, Sparks operating on Channel 202. A Waiver Request of §74.1204 is being submitted to show that operation of K201DR on Channel 200 would reveal that there is no population that would be affected in the interference area making operation on channel 200 FCC Compliant with §74.1204:

**2) Operation on Channel 200 complies with Section §73.501 (a) footnote (1):**

- a) K201DR is an existing Class D FM station that was required to cease operation and change Channel due to KLRH, Sparks on Channel 202.
- b) Channel 200 does create contour overlap with KLRH but produces no population in the interference area using the U/D method for calculating proposed interference, as provided for in §74.1204(d). Channel 200 will not affect any other adjacent channel noncommercial educational FM station.
- c) TV Channel 6 KVIE, Sacramento, CA: Due to terrain shielding and a distance of 198.36 kilometers, Channel 200 meets TV 6 specifications for interference.
- d) Canadian Border: Closest point approximately 1200 kilometers (well outside 402 km).
- e) Mexican Border: Closest point approximately 645 kilometers (well outside 320 km).

**3) Compliance with Section §73.512:**

- a) No other noncommercial or commercial FM Channel is available due to a “freeze” in the NCE reserved band and §73.512(2) which specifically states that if a commercial channel is unavailable, to the extent possible each application should propose operation on Channel 200(87.9MHz). It is possible that K201DR can operate on Channel 200 free of any interference to TV Channel 6, any other FM station and all Canadian and Mexican broadcasts.

Because Calvary Chapel of Twin Falls, Inc. has shown that it meets all stipulations concerning non availability of Channels, Compliance with rules and regulations for adjacent FM stations, TV Channel 6 interference and distances to the Canadian and Mexican borders, K201DR should be allowed to operate on Channel 200/87.9MHz, as stated in CFR §74.1202, §73.201 with further instructions for channel availability in §73.501 (a)(1) and §73.512 the specific standards governing the use of Channel 200.