

COMPREHENSIVE TECHNICAL EXHIBIT

DISCUSSION

Applicant seeks to relocate full-service KZHK(FM), St. George, UT, FID # 40519, 0.32 km to a new nearby tower with a corresponding change in the CORAMSL and ERP.

ANTENNA SITE CITY GRADE COVERAGE

Figure 1 below reveals continued 100% 70 dBu city-grade coverage of the City of License (St. George, UT)

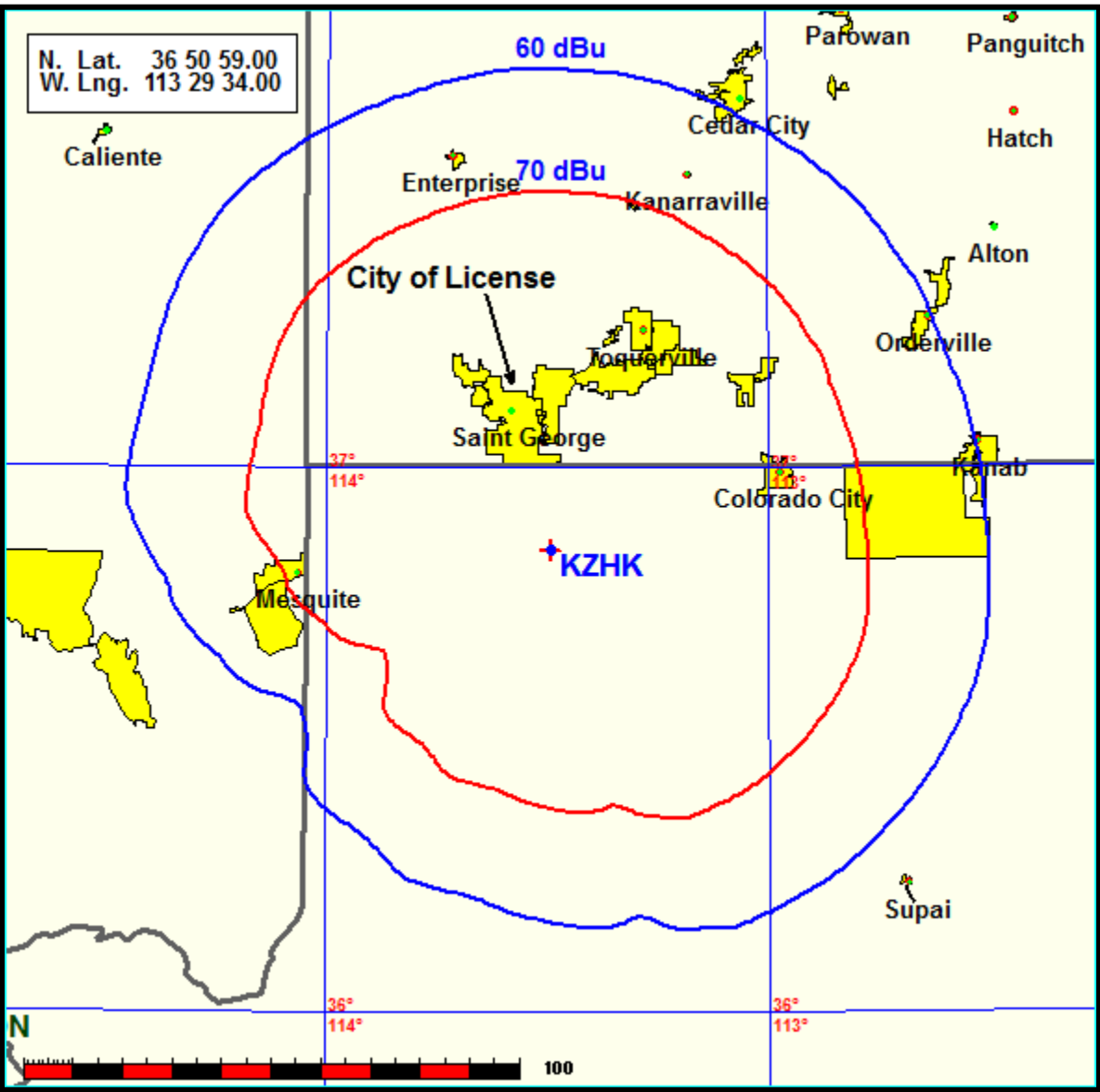


Figure 1

INTERFERENCE STUDY (Requesting Section 73.215 Contour Protection):

Figure 2 is a channel spacing study from the proposed KZHK(FM) antenna site noting that the proposed KZHK(FM) antenna site would be short-spaced 10.2 km to KKLD(FM) Cottonwood, AZ, 240C0, FID # 51642. **(KKLD is licensed as a 73.215 facility)**. The applicant requests Section 73.215 contour protection processing. KZHK(FM) is eligible to request 73.215 Contour Protection towards KKLD(FM) as it complies with the minimum separation requirements on its Co-channel at its proposed antenna site. The channel spacing study in **Figure 2** shows that the proposed KZHK(FM) 240C0 antenna location is spaced 270.28 kilometers from the KKLD(FM) site. In order to be eligible for 73.215 Contour Protection, the minimum “C to C0” spacing for Co-channel stations must be at least 271.5 kilometers. The proposed KZHK(FM) 240C0 antenna site satisfies this requirement by -10.0 kilometers (rounded).

Spacing Study Marvin Kent Frandsen									
REFERENCE				DISPLAY DATES					
36 50 59.00 N.				CLASS = C Int = C					
113 29 34.00 W.				Current Spacings to 3rd Adj.					
-----				Channel 240 - 95.9 MHZ -----					
Call		Channel		Location		Azi	Dist	FCC	Margin
-----		-----		-----		-----	-----	-----	-----
KZHK	LIC-N	240C	St. George	UT	165.8	0.32	289.5	-289.2	
KKLD	LIC-N	240C0	Cottonwood	AZ	152.3	270.28	280.5	-10.2	
KKLZ	LIC	242C	Las Vegas	NV	235.8	164.76	104.5	60.3	
KWNR	LIC	238C	Henderson	NV	235.8	164.76	104.5	60.3	
KPKR	LIC	239B1	Parker	AZ	192.4	288.28	192.5	95.8	
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All separation margins include rounding									
73.215 processing requested									

Figure 2

Using the facilities proposed herein, KZHK(FM) 240C complies with the contour protection requirements of Section 73.215 towards KKLD(FM) 240C0, see **Figure 3**. The overlap map in **Figure 4** demonstrates that this application complies with the contour protection requirements of Section 73.215. **Figure 4** demonstrates that the proposed KZHK(FM) F(50,50) 60 dBu Protected Contour does not overlap the F(50,10) 40 dBu Interfering Contour of KKLD(FM) operations on Channel 240C0. Likewise, **Figure 4** demonstrates that the F(50,50) 60 dBu Protected Contour for KKLD(FM) does not overlap the proposed F(50,10) 40 dBu Interfering Contour of the instant KZHK(FM) application on 240C. Therefore, it appears as though the instant application meets the requirements of Section 73.215 towards KKLD(FM).

73.215 Contour Protection Study

Marvin Kent Frandsen

REFERENCE
36 50 59.0 N.
113 29 34.0 W.

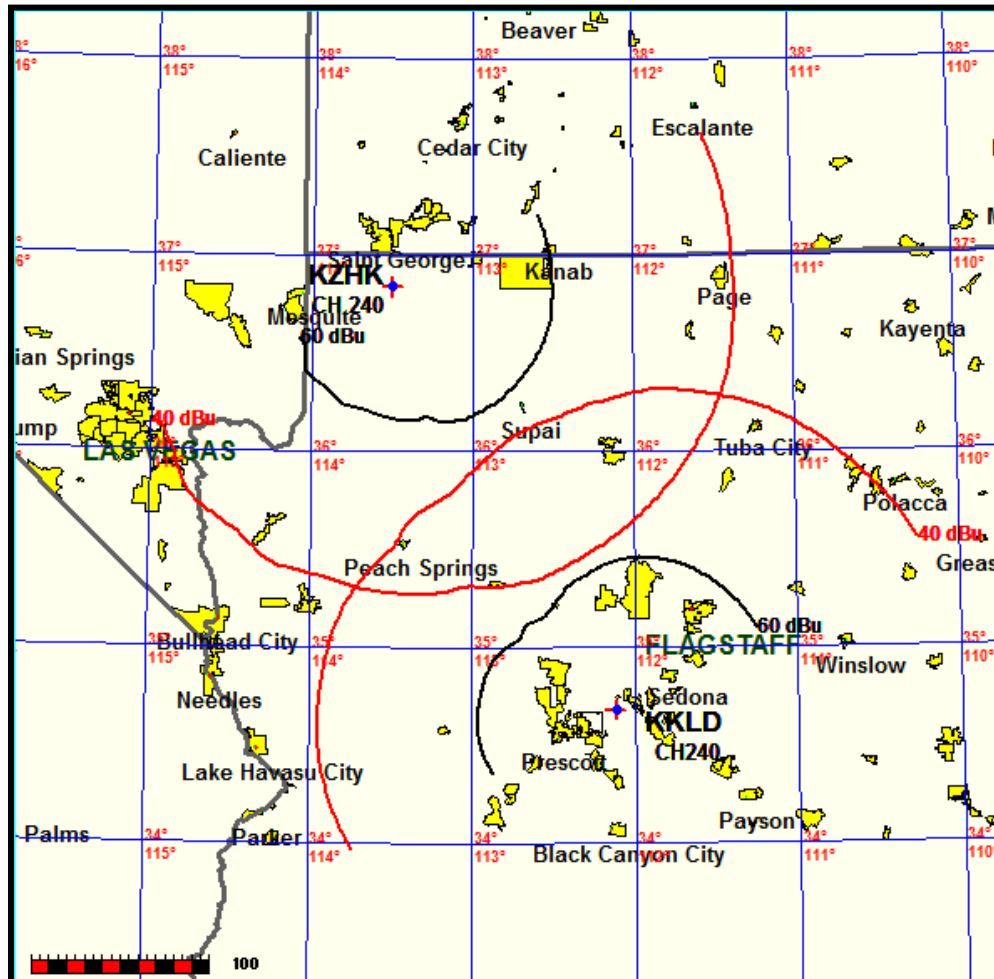
CH# 240C - 95.9 MHz, Pwr= 70 kW, HAAT= 599.8 M, COR= 1955 M
Average Protected F(50-50)= 88.2 km
73.215 Omni-directional

DISPLAY DATES
DATA 09-11-20
SEARCH 09-11-20

CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
240C	KZHK!	LIC	N	165.8	0.32	36 50 48.90	70.000		---Reference---		
St. George			UT	345.8	BMLH20130325ACG	113 29 30.80	595	1960	Marvin Kent Frandsen		
240C0	KKLD	LIC	N	152.3	270.57	34 41 12.10	21.000	163.9	70.5	22.1	9.3
Cottonwood			AZ	333.1	BMLH20100428AEO	112 07 04.60	799	2388	Yavapai Broadcasting Corpo		
242C	KKLZ«	LIC		235.8	164.76	36 00 28.90	100.000	12.4	80.0	104.5R	60.3M
Las Vegas			NV	54.9	BMLH20111201LCE	115 00 22.90	358	1056	Beasley Media Group Licens		
238C	KWNR«	LIC		235.8	164.76	36 00 30.90	100.000	12.3	79.3	104.5R	60.3M
Henderson			NV	54.9	BLH19890629KB	115 00 24.90	354	1044	Citicasters Licenses, Inc.		
239B1	KPKR«	LIC		192.4	288.28	34 18 39.10	6.300	54.2	42.2	192.5R	95.8M
Parker			AZ	12.0	BMLH20190906AAK	114 10 10.80	200	537	River Rat Radio, LLC		

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference Zone= - Zone 2, Co to 3rd adjacent.
All separation margins (if shown) include rounding. Call signs with exclamation marks need not be protected.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
« = Station meets FCC minimum distance spacing for its class.

Figure 3



KZHK vs KKLD

Figure 4

ENVIRONMENTAL COMPLIANCE:

Downward Radiation Study (Measure Upon Construction)

Due to the fact that several existing and proposed emitters are located at or near the site, the applicant agrees to conduct a Radiofrequency Electromagnetic Field survey at the site upon construction of the proposed facility to ensure that any areas at ground level that exceed the Commission's exposure guideline values are appropriately marked and fenced. The results of the survey will be provided with the application for license. Even though the site will fully comply with the Uncontrolled Site Standards, access to the transmitting site will be restricted and appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency radiation will not exceed the FCC guidelines.

Existing Tower:

The proposed facility is exempt from environmental processing because the facility is not located at a location specified in Section 1.1307(a)(1)-(8) of the Commission's Rules and since the tower in question already exists.