

Exhibit 11 -

Description: SPECIAL OPERATING CONDITION - LICENSE TO COVER K253CQ & K300DR

(A) BEFORE PROGRAM TESTS COMMENCE, SUFFICIENT MEASUREMENTS SHALL BE MADE TO ESTABLISH THAT THE OPERATION AUTHORIZED IN THIS CONSTRUCTION PERMIT IS IN COMPLIANCE WITH THE **SPURIOUS EMISSIONS REQUIREMENTS** OF 47 C.F.R. SECTIONS 73.317(b) THROUGH 73.317(d). ALL MEASUREMENTS MUST BE MADE WITH ALL STATIONS SIMULTANEOUSLY UTILIZING THE SHARED ANTENNA. THESE MEASUREMENTS SHALL BE SUBMITTED TO THE COMMISSION ALONG WITH THE FCC FORM 350-FM APPLICATION FOR LICENSE TO COVER.

(B) ANY EMISSION APPEARING ON A FREQUENCY REMOVED FROM THE CARRIER BY BETWEEN 120 KHZ AND 240 KHZ INCLUSIVE MUST BE ATTENUATED AT LEAST 25 DB BELOW THE LEVEL OF THE UNMODULATED CARRIER. COMPLIANCE WITH THIS REQUIREMENT WILL BE DEEMED TO SHOW THE OCCUPIED BANDWIDTH TO BE 240 KHZ OR LESS.

(C) ANY EMISSION APPEARING ON A FREQUENCY REMOVED FROM THE CARRIER BY MORE THAN 240 KHZ AND UP TO AND INCLUDING 600 KHZ MUST BE ATTENUATED AT LEAST 35 DB BELOW THE LEVEL OF THE UNMODULATED CARRIER.

(D) ANY EMISSION APPEARING ON A FREQUENCY REMOVED FROM THE CARRIER BY MORE THAN 600 KHZ MUST BE ATTENUATED AT LEAST $43 + 10 \log_{10}(\text{POWER, IN WATTS})$ DB BELOW THE LEVEL OF THE UNMODULATED CARRIER, OR 80 DB, WHICHEVER IS THE LESSER ATTENUATION.

MEASUREMENTS: TEST EQUIPMENT UTILIZED INCLUDE A TEKTRONIX 492/6 SPECTRUM ANALYZER (1KHZ TO 1.8 GHZ) AND BIRD 4275-020 VARIABLE RF SIGNAL SAMPLER 20 TO 1000 MHZ

RESULTS:

WITH REGARD TO SECTION 73.317 (B) AND (C), BOTH SIGNALS WERE EXAMINED FOR COMPLIANCE OF ALL EMISSIONS TO BE AT LEAST 25 DB DOWN FROM THE UNMODULATED CARRIER REFERENCE BETWEEN 120 AND 240 KHZ (PLUS / MINUS CENTER FREQUENCY) AND AT LEAST 35 DB DOWN FROM THE UNMODULATED CARRIER REFERENCE BETWEEN 240 AND 600 KHZ. **BOTH CARRIERS WERE FOUND TO BE IN COMPLIANCE BOTH WITH AND WITHOUT MODULATION BY MORE THAN THE MINIMUM 35 DB REQUIRED ATTENUATION.**

THE FM TRANSLATOR CARRIERS AT 98.5 MHZ AND 107.9 MHZ ARE SEPARATED BY 9.4 MHZ. A TWO CHANNEL SHIVELY LABS - BRANCHED COMBINER - MODEL 2930-2/3-06 (EQUIVALENT) IS USED THAT PROVIDES GREATER THAN 80 DB ISOLATION FOR BOTH CARRIER FREQUENCIES 9.4 MHZ APART.

WITH REGARD TO SPURIOUS EMISSIONS SECTION 73.317(D), THE FOLLOWING INTERMOD FREQUENCIES ARE POTENTIAL OFFENDERS:

3RD ORDER IM PRODUCTS: **89.1** AND 117.3 MHZ
5TH ORDER IM PRODUCTS: 79.7 AND 126.7 MHZ
7TH ORDER IM PRODUCTS: 70.3 AND 136.1 MHZ
9TH ORDER IM PRODUCTS: 60.9 AND 145.5 MHZ

EXISTING FM STATIONS IN KENAI ALASKA:

KOGJ 88.1 MHZ FM 201ND - A - LIC (NON-COM)

KDLL 91.9 MHZ FM 220ND - A - LIC (NON-COM)

K237CI 95.3 MHZ FX 237ND - D - LIC (NON-COM)

K253CQ 98.5 MHZ FX 253ND-D - CP LICENSE APPLICATION PENDING (COMMERCIAL)

K257ER 99.3 MHZ FX 257ND-D - LIC (COMMERCIAL)

KWHQ 100.1 MHZ FM 261ND-C3 - LIC (COMMERCIAL)

K285EF 104.9 MHZ FX 285ND-D - LIC (COMMERCIAL)

K291BH 106.1MHZ FX 261ND-D - LIC (COMMERCIAL)

K300DR 107.9 MHZ FX 300ND-D - CP LICENSE APPLICATION PENDING (COMMERCIAL)

THE ENTIRE FM BAND WAS EXAMINED FROM 88 TO 108 AND ALL EMISSIONS WERE BELOW THE REQUIRED 63 DB MINIMUM, RELATIVE TO THE UNMODULATED CARRIER LEVELS OF BOTH 98.5 AND 107.9 MHZ. THE STRONGEST THIRD ORDER IM PRODUCT IN BAND FREQUENCY OF 89.1 MHZ FELL WELL BELOW THE 63 DB MINIMUM AT A LEVEL OF APPROXIMATELY 68 DB BELOW THE REFERENCE UNMODULATED CARRIER. THE 117.3 MHZ THIRD ORDER IM PRODUCT (ABOVE THE 108 MHZ UPPER FM BAND ALLOCATION) WAS MORE THAN 70 DB BELOW THE REFERENCE UNMODULATED CARRIER. ALL OTHER IM PRODUCTS ARE OUTSIDE THE FM BAND AND WERE NOT FOUND TO EXIST ABOVE THE BASELINE NOISE LEVEL OF THE SPECTRUM ANALYZER (OR MORE THAN 80 DB BELOW THE REFERENCE LEVEL). **THEREFORE ANY SPURIOUS LEVELS OF BOTH CARRIERS WERE DETERMINED TO BE TOO SMALL TO MEASURE AND BELOW THE MAXIMUM SPURIOUS LEVELS ALLOWED, AS SPECIFIED IN 47 C.F.R. SECTION 73.317 (B,C & D).**

THE TWO NEW FM TRANSLATOR STATIONS ARE LOCATED IN THE COMMERCIAL PORTION OF THE FM BAND ABOVE 92.1 MHZ AND NO INTERFERENCE WAS PRESENT THAT AFFECTED ANY OF THE SEVEN LISTED EXISTING COMMERCIAL AND NON-COMMERCIAL FM STATIONS LICENSED TO KENAI, ALASKA.

THE AM STATION IDENTIFIED AS **KPEN(AM) KENAI, AK** FAC. ID NO. 160571 IS CONNECTED AND LICENSED TO TOWER ASRN **1210091**. ALSO CO-LOCATED NEARBY IS TOWER ASRN **1007554** THAT IS SPECIFIED IN BOTH CP'S FOR MOUNTING THE SHARED BEXT FM TRANSMIT ANTENNA FOR K253CQ AND K300DR. THE PERMITTEE INSTALLED A **3 - WIRE FOLDED UNIPOLE AM DETUNING SYSTEM** MANUFACTURED BY **NOTT LTD.** FARMINGTON, NEW MEXICO ON TOWER ASRN 1007554, USED FOR MOUNTING THE K253CQ AND K300DR SHARED BEXT FM ANTENNA. THIS SYSTEM WAS INSTALLED ON ASRN 1007554 TO ELIMINATE ANY RE-RADIATION BY THIS TOWER DUE TO ANY MUTUAL COUPLING TO NEARBY TOWER ASRN 1210091. THIS DETUNING SYSTEM PREVENTS ANY DISTORTION OF THE KPEN (AM 840 KHZ) NON-DIRECTIONAL PATTERN (TO LESS THAN 2 DB) AS REQUIRED TO SATISFY THIS CONDITION.

THE DETUNING SYSTEM WAS INSTALLED AND ADJUSTED FOR MINIMUM RE-RADIATION PER INSTRUCTIONS PROVIDED BY NOTT LTD.

TESTING OF KPEN AM 840 KHZ AT 5 KW FULL LICENSED POWER SHOWS THAT AT A FORWARD POWER OF 5,000 WATTS, THE REFLECTED POWER IS 1 WATT OR LESS, WITH AN INDICATED VSWR OF 1.00 TO 1. THE INSTALLATION OF THE BEXT 2 BAY FM ANTENNA (MODEL TFC-2K-D) ON TOWER ASRN 1007554 (WHICH IS GROUNDED), WITH THE NOTT AM UNIPOLE DETUNING SYSTEM INSTALLED, HAS RESULTED IN NO INDICATED EFFECT ON THE MEASURED 50 +/-J0 OHMS IMPEDANCE AT 840 KHZ OF ASRN TOWER 1210091.

MEASUREMENTS OF THE AM ASRN 1210091 TOWER IMPEDANCE OF 50 OHMS **REMAINED UNCHANGED BEFORE AND AFTER THE INSTALLATION OF THE BEXT 2 - BAY ANTENNA AND ASSOCIATED COAXIAL TRANSMISSION LINE.** THEREFORE, PERMITTEE CERTIFIES THAT THIS RESULT COMPLIES WITH THIS CONDITION AS SPECIFIED ON THE FCC CONSTRUCTION PERMIT.

STATEMENT OF ENGINEER

THIS ENGINEERING EXHIBIT, RELATIVE TO APPLICATIONS FOR LICENSE TO COVER CONSTRUCTION PERMITS FOR **K253CQ** AND **K300DR**, HAS BEEN PREPARED BY THE UNDERSIGNED. ALL REPRESENTATIONS CONTAINED HEREIN ARE TRUE TO THE BEST OF MY KNOWLEDGE. I AM AN EXPERIENCED RADIO ENGINEER (FCC LICENSE PG 23-1349 SINCE 1966) WHOSE QUALIFICATIONS ARE A MATTER OF RECORD WITH THE FEDERAL COMMUNICATIONS COMMISSION. I HAVE BUILT OVER 30 FM TRANSLATOR STATIONS, 3 FULL SERVICE AM STATIONS AND 3 FULL SERVICE FM STATIONS IN ALASKA SINCE 1979. I HAVE BEEN EMPLOYED AS AN ELECTRONIC DESIGN ENGINEER BY RAYTHEON COMPANY, ELECTROMAGNETICS SYSTEM DIVISION, SANTA BARBARA, CALIFORNIA FROM 1967 -1973. I MOVED TO ALASKA IN 1973 AND WORKED FOR K-COMM AS A MARINE RADAR ENGINEER FROM 1973 -1978. I FOUNDED PENINSULA COMMUNICATIONS, INC. IN 1978 AND HAVE SERVED AS PRESIDENT AND CHIEF ENGINEER FOR 43 YEARS. I HOLD BSEE AND MSEE DEGREES IN ELECTRONIC ENGINEERING AND I AM A MEMBER OF THE SOCIETY OF BROADCAST ENGINEERS (SBE) FOR OVER 30 YEARS. I HOLD AN FCC AMATEUR RADIO EXTRA CLASS LICENSE WITH CALL SIGN AL7DB, FIRST LICENSED IN AUGUST, 1958.

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DAVID F. BECKER
BSEE/MSEE/SBE
PRESIDENT AND CHIEF ENGINEER
PENINSULA COMMUNICATIONS, INC.
HOMER, ALASKA
(907) 399-3283 CELL