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**Engineering Statement  
KVFR-LD FID 168117**

Application is to move to new tower site nearby thanks to loss of tower space at present site. Same antenna is used; 250 Watt transmitter allows operation at 1.5 kw ERP. Tower is unregistered; less than 200' tall. No airports are located within 8 km of the site. NIER is less than 5% of the limit for this service. OET69 study shows compliance with all pertinent portions of 47 CFR 1.1307.

Respectfully submitted,

B. W. St. Clair  
Engineering Consultant  
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