Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

_____

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

It either or both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Channel Study
Proposed 275 Berthoud

REFERENCE CH# 275D - 102.9 MHz, Pwr= 0.1 kW, HAAT=0.0 M, COR= 1637 M DISPLAY DATES
40 14 24 N Average Protected F(50-50)= 5.64 km DATA 07-12-03
105 03 23 W Ave. F(50-10) 40 dBu= 18.6 54 dBu= 8.0 80 dBu= 1.8 100 dBu= .7 SEARCH 07-12-03

CH CALL	TYPE	AZI.	DIST	LAT.	Pwr(kW)	COR(M)	PRO(km)	*IN*	*OUT*
CITY	STATE	<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)	
275C1 KARSFM	CP CY	322.9	89.07	40 52 37	100.000	392	79.2	-94.71<	4.86
Laramie	WY	142.9	BMPH20020926ABK	105 41 44	392	5.0	Agm-nevada Llc		
275C1 RADD	ADD	323.3	91.65	40 53 55	100.000	-2642	31.0	-40.66<	55.65
Laramie	WY	143.3		105 42 31	-2642	5.0			
278C KRFX.A	APP DCX	195.3	58.34	39 43 59	100.000	449	83.3	35.69	-25.66*<
Denver	CO	15.3	BPH20030424AAO	105 14 10	449	0.7	Jacor Broadcasting Of Colo		
278C KRFX.A	APP DCX	195.3	58.34	39 43 59	100.000	449	83.3	35.69	-25.66*<
Denver	CO	15.3	BPH20030424AAO	105 14 10	449	0.7	Jacor Broadcasting Of Colo		
278C KRFX	LIC CN	195.1	58.59	39 43 50	100.000	333	74.8	37.42	-16.92*<
Denver	CO	15.1	BLH4823	105 14 07	333	0.7	Jacor Broadcasting Of Colo		
278C RDEL	DEL	195.1	58.59	39 43 50	100.000	-1809	31.0	44.91	26.96
Denver	CO	15.1		105 14 07	-1809	0.7			
273C2 KTRR.A	APP CX	25.1	26.43	40 27 19	50.000	102	45.2	19.85	-18.77*<
Loveland	CO	205.1	BPH20030602BAH	104 55 25	102	0.0	Regent Broadcasting Of Ft.		
273C2 KTRR	LIC DCN	25.1	26.43	40 27 19	39.008	102	43.1	20.17	-16.68*<
Loveland	CO	205.1	BLH19880713KA	104 55 25	102	0.0	Regent Broadcasting Of Ft.		
275C KARSFM	LIC CN	344.4	123.55	41 18 39	100.000	187	62.5	-38.25<	55.34
Laramie	WY	164.4	BLH19851018KD	105 27 12	187	5.7	Agm-nevada Llc		
278C0 RADD	ADD	195.1	58.59	39 43 50	100.000	-1809	31.0	44.91	26.96
Denver	CO	15.1		105 14 07	-1809	0.7			
273C2 RADD	ADD	22.5	40.42	40 34 33	50.000	-1484	26.5	36.12	13.89
Loveland	CO	202.5		104 52 22	-1484	0.0			
275D AP275	APP DE	206.7	58.93	39 45 57	0.003	140	4.9	33.12	20.70
Wheat Ridge	CO	26.7	BNPFT20030312AGW	105 21 59	140	33.3	Educational Communications		
273C2 KTRR.A	APP NCX	24.3	49.02	40 38 31	17.000	267	52.7	41.71	-3.67*<
Loveland	CO	204.3	BPH20030430ACT	104 49 03	267	0.0	Regent Broadcasting Of Ft.		
273C2 KTRR.A	APP NCX	24.3	49.02	40 38 31	17.000	267	52.7	41.71	-3.67*<
Loveland	CO	204.3	BPH20030430ACT	104 49 03	267	0.0	Regent Broadcasting Of Ft.		
221D AP221	APP DE	0.0	0.00	40 14 24	0.100	121	11.3	3.2R	-3.2M
Lafayette	CO	180.0	BNPFT20030312ACN	105 03 23	121	1.6	Educational Communications		
276D AP276	APP DC	155.6	17.68	40 05 42	0.000	34	1.4	5.10	0.56
Frederick	CO	335.6	BNPFT20030317AHQ	104 58 14	34	15.8	Frank G. Mccoy		
276D K276BJ	LIC DCN	233.6	31.48	40 04 19	0.000	689	0.6	23.61	21.42
Boulder	CO	53.6	BLFT19830214MC	105 21 14	689	9.5	Jacor Broadcasting Of Colo		
TRANSLATOR FOR KTCL, FT. COLLINS, CO.									
276D AP276	APP DE	58.9	32.12	40 23 19	0.000	67	1.7	28.07	27.93
Greeley	CO	238.9	BNPFT20030312AXE	104 43 56	67	2.5	Educational Communications		
276C ALLO	RSV	135.4	125.00	39 26 08	100.000	-1700	31.0	56.45	80.76
Parker	CO	315.4	RM9890	104 02 05	-1700	13.3			
Counterproposal in MM 00-6; Site Restriction: 63.4 km East.									
221D AP221	APP C	50.9	24.48	40 22 42	0.010	87	5.4	3.2R	21.3M
Elm	CO	230.9	BNPFT20030317AZM	104 49 56	87	1.7	Horizon Christian Fellowsh		
277D AP277	APP DC	339.5	30.06	40 29 36	0.000	462	3.8	28.47	26.21
Fort Collins	CO	159.5	BNPFT20030317JQN	105 10 52	462	0.0	Regent Broadcasting Of Ft.		
276C KAVD.A«	APP CX	134.2	127.23	39 26 15	100.000	594	91.6	-18.39<	22.56
Parker	CO	314.2	BPH20011207AAM	103 59 43	594	13.1	The Meadowlark Group, Inc		
221D AP221	APP DE	339.5	30.06	40 29 36	0.000	465	0.2	3.2R	26.9M
Windsor	CO	159.5	BNPFT20030312ADP	105 10 52	465	1.5	Educational Communications		
221D AP221	APP DE	58.9	32.12	40 23 19	0.001	67	2.9	3.2R	28.9M
Eaton	CO	238.9	BNPFT20030312AWY	104 43 56	67	1.6	Educational Communications		
272C3 KAGM.A	APP ZCX	144.6	73.84	39 41 50	3.146	158	29.9	60.73	43.39
Strasburg	CO	324.6	BPH20030430ACS	104 33 25	158	0.5	Kagm-fm Joint Venture		

CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kW)	COR(M)	PRO(km)	*IN*	*OUT*
CITY		STATE	<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)	
274D	AP274	APP DV	182.9	47.10	39 48 59	0.030	32	4.3	29.93	26.83
Arvada		CO	2.9	BNPFT20030310ABX	105 05 03	32	16.0	Timothy C. Cutforth		
221D	AP221	APP DE	301.5	38.56	40 25 13	0.000	460	1.1	3.2R	35.4M
Estes Park		CO	121.5	BNPFT20030313AOE	105 26 39	460	1.6	Educational Communications		
274D	AP274	APP DV	195.1	58.72	39 43 46	0.008	435	11.1	31.81	32.83
Golden		CO	15.1	BNPFT20030317EGU	105 14 08	435	14.8	Kevin J. Youngers		
272A	RADD	ADD	161.9	71.75	39 37 32	6.000	-1677	15.8	58.95	55.35
Greenwood Village		CO	341.9		104 47 47	-1677	0.7			
272D	AP272	APP C	216.7	69.10	39 44 26	0.005	-69	2.7	60.00	65.91
Idaho Springs		CO	36.7	BNPFT20030317MVZ	105 32 21	-69	0.5	Mitchell A. Beranek		
274C	KBIQ	LIC C	174.2	166.80	38 44 43	72.000	992	101.5	8.06	48.52
Manitou Springs		CO	354.2	BMLH20030423AAT	104 51 39	992	16.8	Bison Media, Inc.		
274L1	KYGT-L	LIC	223.3	77.40	39 43 56	0.100	250	16.3	44.79	49.65
Idaho Springs		CO	43.3	BLL20021003AAE	105 40 38	250	11.4	Clear Creek Radio, Inc.		
276C1	KAVD	LIC NC	124.8	148.52	39 28 12	100.000	210	64.7	44.66	72.38
Limon		CO	304.8	BLH20001129AAZ	103 38 14	210	11.4	The Meadowlark Group, Inc.		
272A	RDEL	DEL	138.4	93.93	39 36 23	6.000	-1709	15.8	82.53	77.71
Strasburg		CO	318.4		104 19 42	-1709	0.5			
272A	KAGM	LIC CN	138.4	93.93	39 36 23	6.000	104	28.9	81.30	64.59
Strasburg		CO	318.4	BLH19960926KD	104 19 42	104	0.5	Kagm, Llc		

"*"Affixed to 'IN' or 'Out' values = site inside protected contour.
ERP and HAAT are on direct line to and from reference station.
"«" = Station meets FCC minimum distance spacing for its class. "<" = Contour Overlap

Terrain and Contour Study
N. Lat. = 40 14 24 W. Lng. = 105 03 23
HAAT and Distance to Contour - FCC Method - 03 Arc. Sec.
AP275 , Educational Communications Of, BNPFT20030312ACW

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	100-F1
000	1528.7	108.3	0.0001	-40.46	0.030	1.59	0.02
030	1514.1	122.9	0.0001	-40.46	0.030	1.64	0.02
060	1529.0	108.0	0.0001	-40.46	0.030	1.59	0.02
090	1490.8	146.2	0.0001	-40.46	0.030	1.70	0.02
120	1502.0	135.0	0.0152	-18.18	0.390	7.46	0.27
150	1501.8	135.2	0.0667	-11.76	0.817	10.79	0.57
180	1515.6	121.4	0.1000	-10.00	1.000	11.30	0.70
210	1530.0	107.0	0.0667	-11.76	0.817	9.66	0.57
240	1558.0	79.0	0.0152	-18.18	0.390	5.73	0.27
270	1629.0	8.0	0.0001	-40.46	0.030	1.61	0.02
300	1618.6	18.4	0.0001	-40.46	0.030	1.61	0.02
330	1546.4	90.6	0.0001	-40.46	0.030	1.51	0.02

Ave El= 1538.67 M HAAT= 98.33 M AMSL= 1637 M

Channel Study
Proposed 275 Berthoud vs AP276 Fredrick, CO

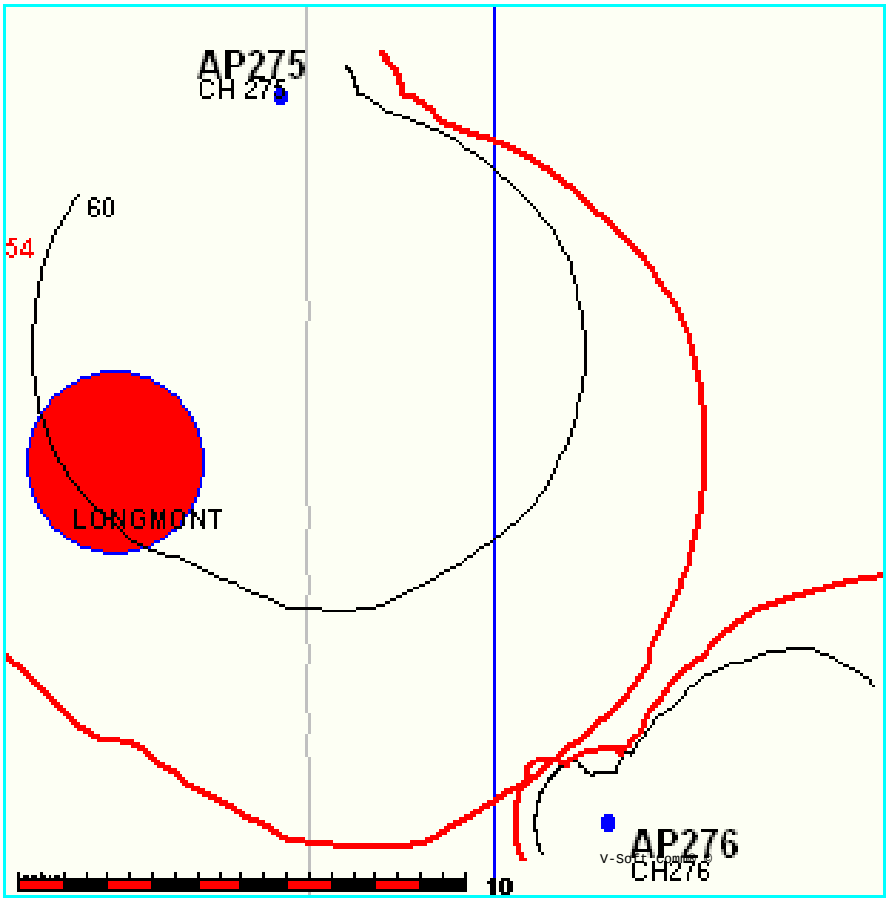
FMCONT Allocation Study

07-12-2003

AP275 CH 275 D
.1 kW 1637M COR DA
Prot. = 60 dBu
Intef. = 54 dBu

AP276 CH 276 D
.25kW, 1544 M COR DA
Prot. = 60 dBu
Intef. = 54 dBu

1:179,688



Channel Study
Proposed 275 Berthoud vs KARS-FM CP

FMCONT Allocation Study

07-12-2003

AP275 CH 275 D
.1 kW 1637M COR DA
Prot. = 60 dBu
Intef. = 40 dBu

KARSFM CH 275 C1
100kW, 2999 M COR
Prot. = 60 dBu
Intef. = 40 dBu

1:3,350,000

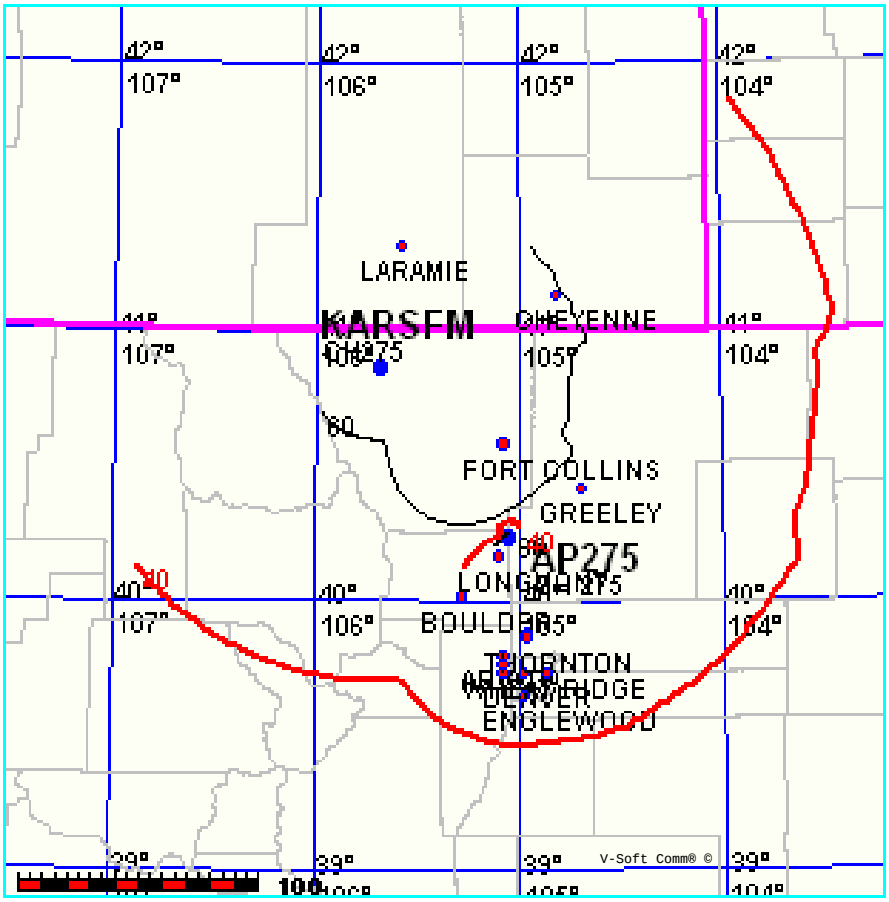


EXHIBIT 12b
Demonstration of No Population in 100 dBu Interference Contour