

EXHIBIT 8

SPACING REQUIREMENTS & MINOR CHANGE JUSTIFICATION

Wastecon Environmental LLC (“Wastecon”) was granted a Construction Permit for a new LPFM on Channel 291 (106.1mhz) on 10/31/03, to serve St. George, UT (BNPL-20000605AHT - “KTIM-LP”). Subsequently, on 10/3/04, the FCC released a Report and Order for Docket 01-135, which ordered station KSNN, St. George, UT, to move to Channel 291C2. KSNN complied with the Order, and is now licensed and on the air with a power of 2.4kw ERP, 30.6km from the KTIM-LP CP site..

As shown by attached **Exhibit 8a**, KTIM-LP’s 50dbu interfering contour has significant overlap with the licensed 70dbu contour of KSNN, and that the area of interference includes St. George, UT, KSNN’s City of Licence. Furthermore, KSNN has applied for an upgrade to Class C0, with a power of 45kw ERP. Clearly, KTIM-LP cannot operate on the same channel as KSNN without causing prohibited interference.

Therefore, in full compliance §73.870(a), Wastecon hereby proposes a minor change to Channel 270 (101.9mHz), at a location 3.0km from the current CP site. As shown by **Exhibit 8b**, this location is fully spaced to all existing and proposed facilities.¹ It also is within the 5.6km minor- change limitation.

Wastecon is ready to commence construction promptly, upon approval.

¹§73.870(a) allows a minor-change to *any* frequency, upon a showing of reduced interference

Exhibit 8a - Contour Overlap - KTIM-LP (cp) vs KSNN

Brown Broadcast Services, Inc.
Job: KTIM-LP updated db.fmj
Master Database: 2006_Feb_01.fmd
Lat: N37:06:59 Lon: W113:33:59 NAD-27
Scale: 1:750000
Channel: 291 Class: L1
Status: Licensed, Construction Permit, Application
Channels: Co-Channel
Range: 29 km, Clearance: -0.5km
Comments: No Comments
Description:

rfInvestigator Version 2.6.26
by rfSoftware, Inc.
Date: 2/12/2006 12:00:35 AM
Key:

City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

This exhibit shows that KTIM-LP must move off Ch291 to avoid interference within the KSNN 70dbu contour and within the KSNN City of License, and that a move to any other available frequency will qualify as a minor change under 47 CFR 73.870(a).

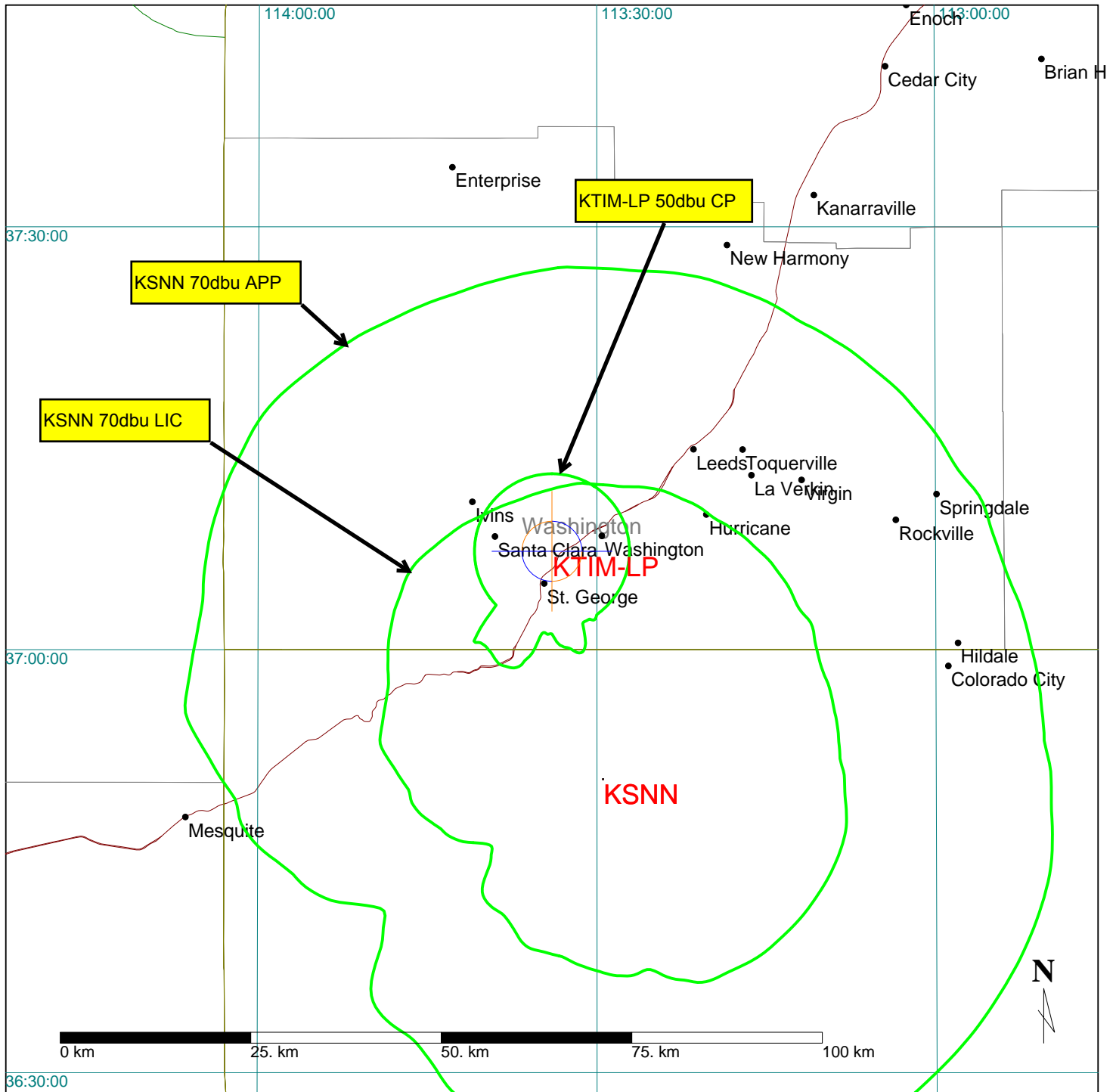


EXHIBIT 8b

SPACING STUDY

KTIM-LP MINOR CHANGE

Ch270

SITE: 37:07:45N; 113:35:46W
Master Database: 22Jan06

Callsign	Latitude	Longitude	City	St	Serv	Ch	Cl	Stat	Min	Clear	ERP	HAAT	Adj	Dist	Bea	Owner	Notes
K272AQ	N37:03:49	W113:34:20	ST. GEORGE	UT	FM	102.3	DX	LIC	8	-0.42	0.014	38	2nd Adj	7.577	164	B. RAY CARPENTER	2
K269AF	N37:10:54	W113:16:53	HURRICANE	UT	FM	101.7	DX	LIC	15	13.56	0.25	-150	1st Adj	28.56	78	BONNEVILLE HOLDING COMPANY	1
NEW	N37:08:56	W113:52:03	SHIVWITS	UT	FM	101.5	DX	APP	21	3.22	0.065	942	2nd Adj	24.22	275	MB MEDIA GROUP, INC.	1
K268BH	N36:46:18	W114:06:03	MESQUITE	NV	FM	101.5	DX	CP	8	51.96	0.25	-93	2nd Adj	59.96	229	BROADCAST TOWERS, INC.	1
KWID	N36:00:30	W115:00:20	LAS VEGAS	NV	FM	101.9	C	LIC	130	47.16	100	360	Co-Chan	177.2	225	CITICASTERS LICENSES, L.P.	

Notes:

- where translator HAATs are missing from the FCC records, they have been reconstructed using FCC 30sec data & 12 radials
- fully spaced with allowable rounding to the nearest km

BROWN BROADCAST SERVICES
INCORPORATED
Portland, Oregon