

AM Station KKJY

Exhibit 11, Compliance with Commission Rules

This application proposes the relocation of the authorized transmitter site of KKJY to a tower currently licensed for use by AM stations KKIM (1000 kHz.) and KRKE (1600 kHz.). Concurrently with this application, an application is being filed for the relocation of KRKE to a tower currently licensed for use by KXKS (1190 kHz.), which is necessary to accommodate the operation on KKJY on the KKIM tower.

KKJY is required to relocate as the tower currently employed for KKJY is licensed to KABQ, and the licensee, Clear Channel Broadcasting Licenses, wishes to employ broadbanding techniques for digital broadcasting. This will render the use of the tower, which is one element of a directional antenna system, impossible to reasonably use for the KKJY operation only 200 kHz. separated from the KABQ digital operation on 1350 kHz. KABQ is operating under Special Temporary Authority to allow non-directional operation during its construction (BSTA20051114AOT). To accommodate the construction process at KABQ, KKJY has requested Special Temporary Authority to use the shorter of two towers at the KABQ site pending the grant of this application.

REQUEST FOR EXPEDITED PROCESSING

Expedited processing of this application and the concurrently filed application for minor change for station KRKE is respectfully requested. As the owner of the current KKJY tower, Clear Channel is operating under an STA pending the completion of construction of its broadbanded directional antenna system. That construction cannot be completed until KKJY no longer occupies the site, and Clear Channel has requested that KKJY move to its new location as soon as possible so as to resolve the STA. This application and that of KRKE are only for relocation of existing facilities to towers already authorized for AM broadcasting, with no change in daytime operating power and nighttime power changes only to the extent provided by the change in radiation efficiency of the different towers to be employed. Expedited processing of this and the KRKE applications will enable Vanguard Media to continue providing uninterrupted broadcast service to its community of license by both KKJY and KRKE.

RULES COMPLIANCE BY RULE SECTION

1. Section 73.24(e): This application proposes the co-location use of an existing tower (KKIM) for non-directional daytime and nighttime operation. The antenna is situated near the city of Albuquerque, which will provide coverage to the greatest possible number of people.

2. Section 73.24(g): The 1.0 V/m contour from the proposed operation extends 0.78 kilometers. The population count in this area is shown as 1413 persons.
3. Section 73.33: The antenna system parameters are provided in Sections 4 and 5 of this application.
4. Section 73.45: The details of the antenna system are provided in this application in Sections 4 and 5. The estimated efficiency is 368.55 mV/m for both daytime and nighttime operation.
5. Section 73.150: This application proposes the use of a non-directional antenna system, therefore Section 73.150 does not apply.
6. Section 73.152: This application proposes the use of a non-directional antenna system, therefore Section 73.152 does not apply.
7. Section 73.160: The proposed antenna is a uniform cross section, conventional radiator that does not employ top loading.
8. Section 73.182: KRKE is licensed as a Class D station. Daytime and nighttime protection to existing stations is discussed in Exhibits 15 and 16 of this application.
9. Section 73.186: The details of the antenna system are provided in this application in Sections 4 and 5. the estimated efficiency is 368.55 mV/m for both daytime operation as well as nighttime operation.
10. Section 73.189: The details of the antenna system are provided in this application in Sections 4 and 5. the estimated efficiency is 368.55 mV/m for both daytime operation as well as nighttime operation.
11. Section 73.1650: The proposed daytime and nighttime operations of KKJY meet the requirements of international agreements to the best knowledge of the applicant.