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EXHIBIT TO APPLICATIONS FOR MODIFICATION AND LICENSE TO COVER
CONSTRUCTION PERMIT BMPFT-20041021ACX

K240CZ, Tigard, OR, Facility ID - 141196 Educational Media Foundation

This facility proposes to move to an existing tower that is located at the same antenna facility as KCMD 970 kHz, Portland, OR. Specifically, K240CZ proposes to locate there facility to an existing tower (ARS-1035120) that is 90 meters from the KCMD array.

This exhibit addresses the likely Special Operating Condition on the modified construction permit, which would deal with the potential adverse affects to the array of AM station KCMD. Typically, these conditions would require a partial proof of performance on KCMD be conducted both before and after construction of the facilities authorized by the modified construction permit. We believe that these condition would be unnecessary, as the antenna for the translator is to be mounted on an existing tower, and is therefore unlikely to have any significant affect on the AM station's array. More recent construction permits for FM translators have updated AM proximity conditions such as the following:

*If the antenna is mounted on an existing tower that is not base-insulated or detuned
at the AM frequency, the permittee shall submit a certification to this effect.*

We certify that the antenna for K240CZ is proposed to be mounted on a pre-existing grounded steel tower, and respectfully request that no condition for a partial proof be placed on the construction permit.

STATEMENT OF ENGINEER

This Engineering Exhibit prepared for K240CZ, Tigard, OR has been prepared by myself or under my direct supervision. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Alaska.

Stephen S. Lockwood, P.E.

4 January 2007

