

**Exhibit 16 – 73.509 Contour overlap  
KGSP form 340 minor change  
October 22, 2009**

As a class D station, KGSP may accept interference from primary licensed facilities and therefore only needs to protect the 1 mV/m (60dBu) F(50,50) service contours of other licensed facilities on the same channel and first through third adjacent, and the 73.507 distance for intermediate frequencies. The following were discovered to fall within the search radius and therefore considered as being potentially affected. The existing licensed facility of KGSP is not included. Power (P) is in kilowatts, average height (H) is in meters above average terrain, and distance is in km. “KGSP int” refers to the 40dBu F(50,10) interfering contour for co-channel, the 54dBu F(50,10) interfering contour for first adjacent stations, the 80dBu F(50,10) interfering contour for second adjacent stations, and the 100dBu F(50,10) interfering contour for third adjacent stations.

Call	COL	Channel	Status	Relationship	P	H	Distance	protected	KGSP int	Margin
KGTR	Albany	210C2	CP	third adjacent	22	129	115.4	42.1	1.5	73.3
KKFI	Kansas City	211C1	Lic	second adjacent	100	129	20.9	55.5	1.8	-36.1
KBUZ	Topeka	212C2	Lic	first adjacent	11	256	120.2	47.9	8.0	64.3
KRBW	Ottawa	213A	Lic	co-channel	.43	57	84.3	11.3	18.5	54.5
KXCV	Maryville	213C1	Lic	co-channel	100	193.1	135.8	63.1	18.5	54.2
New	Clinton	213C2	App	co-channel	15	146	138.7	41.1	18.5	79.1
New	Harrisonville	213C1	App	co-channel	75	141.4	99.7	54.7	18.5	26.5
KJHK	Lawrence	214A	Lic	first adjacent	2.3	85	57.4	21.0	8.0	28.4
KTBG	Warrensburg	215C1	Lic	second adjacent	97	135	80.0	56.1	1.8	22.4
KTBG	Warrensburg	215C0	CP	second adjacent	90*	355	67.1	75.4	1.8	-9.8
KCFX	Harrisonville	266C1	Lic	IF	55	303	21.3	22	0	-0.7
KCFX	Harrisonville	266C1	Allot	IF	100	299	33.1	22	0	11.1

\* Employs a directional antenna which is not taken into account in this table.

There are three facilities that require further study. KKFI, KCFX, and KTBG CP (BPED-20070621AQF). Protection to IF frequency KCFX is satisfied by limiting power to 99 watts.

***Protection to KKFI***

KGSP already receives and causes interference to the licensed facility of KKFI. KGSP will be moving from a first adjacent channel with an ERP of 6 watts (-22.22 dBK) to a second adjacent channel with an ERP of 99 watts (-10.04 dBK). No other changes in height or location will occur.

The difference in power is +12.08 dB. Using an undesirable to desirable (U/D) ratio of -6dB for first adjacent stations and a U/D ratio of +20dB for second adjacent stations (a difference of +26dB), KGSP will reduce interference to KKFI by 13.92 dB (26dB – 12.08dB). No new interference will be created as transmit location and height will not change. Section 73.509(d) provides that for grandfathered short-spaced stations, as long as existing interference to a specific station does not increase, the interference is considered acceptable.

If a waiver is required to continue (but reduce) interference to KKFI, then it is hereby requested.

***Protection to KTBG Warrensburg***

The construction permit for KTBG utilizes a directional antenna in order to protect a licensed facility operating in St. Joseph, MO. The table above does not take this directional antenna into consideration.

KGSP is within the KTBG's directional null as it is nearly along the same path as the St. Joseph

station. Using the distance program available on the Media Bureau's website, KGSP's transmitter site is found to be 67.07 km distant from KTBG's transmitter site, at 284.95 degrees true. Using the HAAT program also found at the Media Bureau's web site shows the HAAT along the 275 to 295 degree radials to vary from 364.7 to 366.8 meters. The KGSP HAAT is a maximum of 62 meters along the 118 degree radial and below 62 meters in all other radials.

The antenna pattern on file from the KTBG (BPED-20070621AQF) file shows the antenna pattern to be 0.31 at 280 degrees and .248 at 290 degrees. Using a worst-case gain of 0.31 would make the effective radiated power =  $90\text{kW} * 0.31^2 = 8.65 \text{ kW}$ . A station with 8.65 kW ERP at 366.8 meters would project a 60dBu service contour 53.02 km. The corresponding 80dBu interfering contour for KGSP would be at a maximum 2.58 km, or a total 55.60 km when adding both together. Since KTBG is 67.1km from KGSP, there is a margin of 11.5km. No interference is therefore expected to occur to KTBG due to this proposal.