

EXHIBIT E-1
TECHNICAL STATEMENT AND 73.215 PROCESSING REQUEST
KEZZ MASONVILLE, COLORADO
KEVIN J. YOUNGERS
FCC FORM 301
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This Technical Statement is in support of a minor change application FCC form 301 filed by Kevin J. Youngers for KEZZ(FM)(CP) facility ID # 165959, currently authorized for channel 231C2 at Walden, Colorado. This CP was acquired during FM broadcast auction number 62, and the facility has not yet been constructed.

KEZZ seeks to change its proposed city of license from Walden, Colorado to the new first local service community of Masonville, Colorado on channel 230A. Masonville is a community of an estimated 500 persons according to the U.S. 2000 Census. Walden is a community of 734 persons according to the U.S. 2000 Census, but has significantly declined from a population of 890 persons in the 1990 U.S. Census. Masonville is an independent community without an AM, FM or TV station authorized to it.

Figure 1 is a channel spacing study which shows that channel 230A can be allotted to Masonville with a site restriction of 5.3 kilometers south of the community at the coordinates of N.40°-26'-22", W 105°-12'-21". The community reference coordinates for Masonville, Colorado are: N. 40°-29'-14", W. 105°-12'-37". The allotment point is well within the 16.2 kilometers allowed for allotment of a class A channel to a community. The proposed allotment point is fully spaced to all of the pertinent stations under 73.207 of the Commission's rules. There is an apparent short spacing to KTCL Fort Collins on channel 227C. However, KTCL has been ordered to channel 227CO at Wheat Ridge, Colorado in MB Docket 03-57. There is an apparent short spacing to

KEZZ Berthoud, but this application replaces that application. There are no other spacing concerns for the proposed allotment point for 230A at Masonville, except of course, the short spacing of the authorized facilities of KEZZ at Walden, Colorado on channel 231C2, which will be eliminated by this change in channel assignments proposed in this application.

Figure 2 shows the proposed 70 dB μ predicted (F50,50) contour from a full class A facility (6 KW ERP at 100 Meters HAAT) operating at the proposed allotment point. It shows a facility at this reference point would produce more than adequate 70 dB μ coverage over the entire community of Masonville.

Figure 3 shows a U.S.G.S. map showing the allotment point for channel 230A at Masonville, Colorado. The proposed allotment point is located on privately owned land and is undeveloped at this time, and could be available for construction of a new tower site.

Figure 4 shows a channel spacing study from the proposed transmitter site for KEZZ at Masonville on channel 230A. It is located at N. 40°-29'-37", W 105°-10'-53", which is an existing antenna site on Milner Mountain 2.6 kilometers northeast of the community of Masonville. This site shows that KEZZ will be separated to all other pertinent stations as required under 73.207, with the exception of KZDR Cheyenne, Wyoming on channel 229C3. KZDR is spaced 82.3 kilometers from the proposed site of KEZZ. Under 73.215 the minimum spacing required between these two facilities is 72 kilometers, thus, processing under 73.215 of the Commission's rules is being requested in regards to KZDR Cheyenne. Once again, there is an apparent short spacing to KTCL Fort Collins on channel 227C. However, KTCL has been ordered to channel 227CO at Wheat

Ridge, Colorado in MB Docket 03-57. Also, there is an apparent short spacing to KEZZ Berthoud, but this application replaces that application.

Figure 5 is an interference study conducted against KZDR Cheyenne, Wyoming operating on channel 229C3, adjusted for maximum class C3 facilities from its licensed tower site. It shows that there will not be any overlap between the proposed 54 dB μ (F50,10) interference contour from either station, with the protected 60 dB μ (F50,50) contour from the opposite station.

Figure 6 shows the predicted coverage contours for the new KEZZ at Masonville. It shows that the 70 dB μ contour does encompass the entire community of Masonville as required by Commission rules from the proposed existing Milner Mountain antenna site.

Figure 7 is a Longley-Rice predicted coverage map showing that greater than 70 dB μ coverage will be delivered over the entire community of Masonville with the proposed facilities of KEZZ. It should be noted that the Land Cover Attenuation option was used to calculate this predicted coverage as documented on the map.

Figure 8 shows a terrain profile between the proposed tower site for KEZZ and the reference community coordinates for the community of Masonville, Colorado.

There will not be any loss of service to the community of Walden, Colorado, since KEZZ is a CP awarded in FM broadcast auction # 62, and as of the date has not yet constructed its authorized facilities at Walden, Colorado on channel 231C2. There will remain 9 primary service contours in Walden, Colorado from facilities located in nearby communities.

It should also be noted that channel 222C3 could be allotted at Walden, Colorado should the Commission determine that an FM allotment is still warranted at Walden.

However, channel 231C2 being exchanged for channel 230A at Masonville, would certainly be the preferred distribution of channels, based on a much more efficient use of the available spectrum and population covered.

In summary, it was determined that the new proposed operation of KEZZ at Masonville, Colorado on channel 230A can meet all of the technical requirements under current FCC rules.