

EXHIBIT 11

ENGINEERING STATEMENT

1.0 INTRODUCTION

This Engineering Statement was prepared for SANTA MONICA COMMUNITY COLLEGE DISTRICT (SMCCD), to support its application for a new FM translator station, on Channel 225D, to serve Borrego Springs, California. This application is filed in response to the results of Auction No. 83 for non-mutually exclusive applications (BNPFT-20030317AHA).

2.0 INTERFERENCE CONSIDERATIONS

This application meets the requirements of Rule Section 74.1204, for all co-channel, first, second and third adjacent channel stations. The allocation study results for Channel 225 are shown in Attachment A.

2.1 First Adjacent Channel: The closest full service first adjacent channel station to the proposed translator is KKUU, Channel 224A, in Indio. Attachment B of this exhibit shows the 60 dBu protected contour of KKUU and the 54 dBu interference contour of the proposed translator. There is no overlap of these two contours.

2.2 TV Channel 6 Considerations: This application meets the requirements of Rule Section 74.1205, as this rule relates to interference to TV Channel 6, which does not apply to FM translators on non-reserved channels.

3.0 FM BROADCAST AGREEMENT WITH MEXICO

This application also meets the requirements of the 1992 USA-Mexico FM Agreement (Agreement), Section 2, Low Power FM Stations. Specifically, the following criteria have been satisfied:

3.1 Per Section 2.1.2 of the Agreement, the ERP in the direction of Mexico does not exceed 50 watts.

3.2 Per Section 2.1.2 of the Agreement, the interfering contour produced in the direction of any Mexican co-channel, first, second or third adjacent channel station or allotment, does not extend beyond 32 km.

Co-channel:

Allotment Channel 225B1 Francisco Zarco, BN
The 37 dBu interference contour distance, from the proposed translator in the direction of Francisco Zarco (190.0°), is 18.6 km.

Second Adjacent Channels:

XHRMFM Channel 223C1 Tijuana, BN
The 100 dBu interference contour distance, from the proposed translator in the direction of Tijuana (217.2°), is 0.50 km.

Third Adjacent Channels:

XHMMFF Channel 222B Mexicali, BN
The 100 dBu interference contour distance, from the proposed translator in the direction of Mexicali (129.1°), is 0.50 km.

3.3 Per Section 2.1.3 of the Agreement, the proposed FM translator station's 60 dBu contour must not extend beyond 8.7 km in the direction of Mexico. From the proposed translator site, the direction of the Mexican border is described by an arc beginning at 110° through 222° (222° is where the USA and Mexican border meet at the Pacific Ocean). The maximum distance to the proposed translator's 60 dBu contour throughout this arc is only 5.3 km (at 110°).

4.0 ENVIRONMENTAL CONSIDERATIONS

The proposed site is an existing communications tower site. The proposed translator will operate with only 50 Watts ERP, so is exempt from the requirements of the provisions of Section 1.1307 of the Commission's Rules. Even so, an RFR study was performed (See Attachment C) which showed a maximum field is only 7.4 : W/sq cm 10 meters from the base of the tower.