

Exhibit B-16
KTWS-FM Channel 252C3 Bend, Oregon
Allocation Study

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C3 stations as prescribed in §73.207 of the Commission's Rules, with the exception of a number of pending or proposed allotment changes, discussed in detail below.

In the Report & Order in Docket No. 00-87 substituted Channel 253C3 for Channel 252C3 for use by KTWS at Bend, in order to accommodate the assignment of Channel 251C1 for use at Madras. A Petition for Reconsideration is pending in this proceeding, so the channel substitution at Bend is not yet final. In addition, the Madras allotment is/would be vacant, so there is no licensee or permittee to pay Combined Communications' expenses for the channel change. The instant application requests only a small site change for KTWS, to a new tower to be constructed at the present KTWS transmitter site. Therefore, the effective but not yet final assignment of Channel 251C1 at Madras is no obstacle to the grant of the instant application.

Combined Communications has a pending proposal in Docket No. 03-78 to upgrade KTWS to Channel 253C1 at Bend. The Commission has not yet issued a decision in this docket, most likely pending final resolution of Docket No. 00-87. The instant application requests only a small site change for KTWS, to a new tower to be constructed at the present KTWS transmitter site. Therefore, Combined Communications' proposed but not

yet approved assignment of Channel 253C1 at Bend is no obstacle to the grant of the instant application.

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Channel: 252C3 98.3 MHz
 Latitude: 44 4 39
 Longitude: 121 19 57
 Safety Zone: 32 km
 Job Title: KTWS 252C3 BEND

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
ADD	MADRAS OR	RM-9961	251C1 98.1	0.000 0.0	44-50-02 120-45-55	28.0	95.41 -48.59	144 SHORT
KTWS LIC	BEND OR	BLH-950629KC	252C3 98.3	6.800 191.0	44-04-41 121-19-57	340.2	0.07 -152.93	153 SHORT
DEL	BEND OR	RM-9961	252C3 98.3	0.000 0.0	44-04-41 121-19-57	340.2	0.07 -152.93	153 SHORT
VAC	DALLAS OR	-	252C3 98.3	0.000 0.0	44-55-06 123-19-00	301.4	183.40 30.40	153 CLEAR
ADD	MONMOUTH OR	RM-DD-142	252C3 98.3	0.000 0.0	44-53-08 123-05-36	303.4	166.39 13.39	153 CLEAR
ADD	BEND OR	RM-9961	253C3 98.5	0.000 0.0	44-04-41 121-19-57	340.2	0.07 -98.93	99 SHORT
ADD	BEND OR	RM-10684	253C1 98.5	0.000 0.0	44-04-41 121-19-57	340.2	0.07 -143.93	144 SHORT
DEL	PRINEVILLE OR	RM-9961	254C3 98.7	0.000 0.0	44-13-30 120-46-30	69.6	47.52 4.52	43 CLOSE
VAC	PRINEVILLE OR	-	254C3 98.7	0.000 0.0	44-13-30 120-46-30	69.6	47.52 4.52	43 CLOSE
ADD	PRINEVILLE OR	RM-9961	255C3 98.9	0.000 0.0	44-13-30 120-46-30	69.6	47.52 4.52	43 CLOSE

44444 END OF FM SPACING STUDY FOR CHANNEL 252 44444