

Exhibit 14 - Statement A
ALLOCATION CONSIDERATIONS
prepared for
Public Radio Capital, Inc.
KXOT(FM) Tacoma, Washington
Facility ID 62470
Ch. 219C2 39 kW 168 m

Public Radio Capital, Inc., (“*PRC*”), is the proposed transferee of non-commercial educational FM radio station KXOT(FM) (Ch.219C3, Tacoma, WA, file number BLED-19821119AF) under a pending assignment application. The KXOT license authorizes directional operation at 7.9 kW effective radiated power (“ERP”) at an antenna height above average terrain (“HAAT”) of 168 meters. *PRC* herein proposes to modify the KXOT facility.

Specifically, the instant proposal seeks to increase the KXOT ERP to 39 kW, using the existing tower structure (ASR number 1037820) and using a new directional antenna system side-mounted at the same HAAT as currently authorized. No change to the structure’s overall height is proposed. *PRC* also proposes to correct the site’s geographic coordinates to correspond with the ASR. The proposed coordinate change results in a difference of 1 second latitude, and 1 second longitude.

Terrain elevation averages to establish the HAAT for the proposed facility are obtained from the KXOT license file. Terrain data for the eight “cardinal” radials were derived from U.S.G.S. 7.5 arc-second maps. Averaging these eight radials, the antenna’s resulting HAAT is 168 meters.

A directional antenna system is proposed. The attached **Exhibit 14 - Figure 1** supplies a plot of the proposed directional “envelope” pattern. Tabulated relative field data is supplied in the accompanying FCC Form 340 Section VII “Tech Box” item 11. The resulting 60 dBu contour of the proposed facility is depicted in **Exhibit 14 - Figure 2**, along with that of the licensed facility.

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An allocation study for the proposed facility shows that the following existing FM facilities require study in regard to prohibited overlap under §73.509 of the Commission's Rules:

Channel Applicant/Licensee	Call		City		State	Lat Long	Distance Bearing
217C3 BELLEVUE COMMUNITY COLLEGE	KBCS(FM)	LIC	BELLEVUE	8.0 KW	WA 64M	47-35-09 122-08-43	36.58 30.86
217C3 BELLEVUE COMMUNITY COLLEGE	KBCS(FM)	CP	BELLEVUE	8.0 KW	WA 65M	47-35-10 122-08-42	36.62 30.86
218C0 OREGON PUBLIC BROADCASTING	KOPB-FM	LIC	PORTLAND	73.0 KW	OR 470M	45-31-21 122-44-45	199.84 187.85
219A BD OF TRUSTEES OF SKAGIT VALLEY COLLEGE	KSVR(FM)	LIC	MOUNT VERNON	0.17KW	WA 204M	48-23-49 122-18-26	121.71 3.06
220C2 TILLICUM FOUNDATION	KMUN(FM)	LIC	ASTORIA	7.2 KW	OR 332M	46-15-46 123-53-09	162.33 224.98
220C1 NORTHWEST COMMUNITIES EDUCATION CENTER	KDNA(FM)	LIC	YAKIMA	18.5 KW	WA 280M	46-31-42 120-31-03	167.02 120.47

The attached **Exhibit 14 - Figure 3, 3A, 4, 5, and 5A** depict the pertinent protected and interfering contours of the stations listed and the proposed KXOT facility. The contours were plotted using the actual ERP and height above terrain along each radial for each facility, as specified in §73.509(c). For the facilities under study, the antenna elevation above mean sea level, geographic coordinates, and ERP (including directional antenna relative field values, where appropriate) were retrieved from the FCC's engineering database. The requisite contours were determined using U.S.G.S. 3-second digitized terrain data along each radial of interest from each transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The F(50,10) distances are used to calculate distance to interfering contours, however if the distance is less than 16 km the F(50,50) curves are used, as specified by §73.509(c)(1).

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Exhibit 14 - Figure 3 illustrates that there is no prohibited overlap between the proposed KXOT facility and pertinent co-channel facilities. A detail view to demonstrate the lack of prohibited contour overlap to KSVR is provided in **Exhibit 14 - Figure 3A**. **Exhibit 14 - Figure 4** supplies an allocation map of the three nearest first adjacent stations. **Exhibit 14 - Figure 5** depicts the allocation situation with pertinent second and third adjacent stations. KBCS is the only second adjacent facility near enough for consideration. A detail view to demonstrate the lack of prohibited contour overlap to KBCS is provided in **Exhibit 14 - Figure 5A**. There are no third adjacent facilities close enough to warrant study. Although omitted from **Exhibit 14 - Figure 5** and **5A** for clarity, the KBCS Construction Permit facility is slightly more distant (approximately 30 meters) than the licensed facility, and does not involve prohibited contour overlap with the proposed KXOT.

Thus, **Exhibit 14 - Figure 3** through **5A** shows that the proposed KXOT facility fully complies with the prohibited overlap criteria of §73.509.

A spacing study was performed as required by §73.507(c) (regarding facilities differing in frequency by 10.6 or 10.8 MHz from the proposal). The proposed facility meets the minimum distance separation requirements of §73.207 in all such instances. The nearest stations on the pertinent channels are summarized below.

Channel	Call		City	State	Lat	Distance	Reqr'd
Applicant/Licensee					Long	Bearing	Clear
=====							
272C3	KCRX-FM LIC		SEASIDE	OR	45-57-08	191.12	35.00
NEW NORTHWEST BROADCASTERS, LLC		25.0 KW		100M	123-56-14	218.63	156.12
273C	KZOK-FM LIC		SEATTLE	WA	47-30-17	39.24	35.00
INFINITY RADIO HOLDINGS, INC.		73.0 KW		698M	121-58-04	55.13	4.24

TV Channel 6 Considerations

Under §73.525(a)(1), an affected TV Channel 6 station must be considered with a proposed non-commercial educational facility on Channel 219 if the distance between the respective

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transmitter sites is 159 km or less. The nearest Channel 6 TV facility is KOIN(TV), Portland, Oregon (BLCT-2115), at a distance of 200.4 km. Thus, the proposed KXOT facility complies with the protection requirements of §73.525.

International Coordination

The U.S. - Canadian agreement calls for protection consideration for stations within 320 km of the border. However, information from FCC staff and from the Industry Canada database suggests that previous coordination for Channel 219 in Tacoma, Washington establishes it as Class C2, with a limit of 20 kW at 600 meters. From an international perspective, the instant proposal is requesting a smaller Class B equivalent of 50 kW at 150 meters. Thus, it is believed that further international coordination is not required. As appropriate, however, any necessary additional coordination with Canada is requested.

Other Considerations

The nearest FCC monitoring station is 184.1 km distant at Ferndale, Washington. This exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

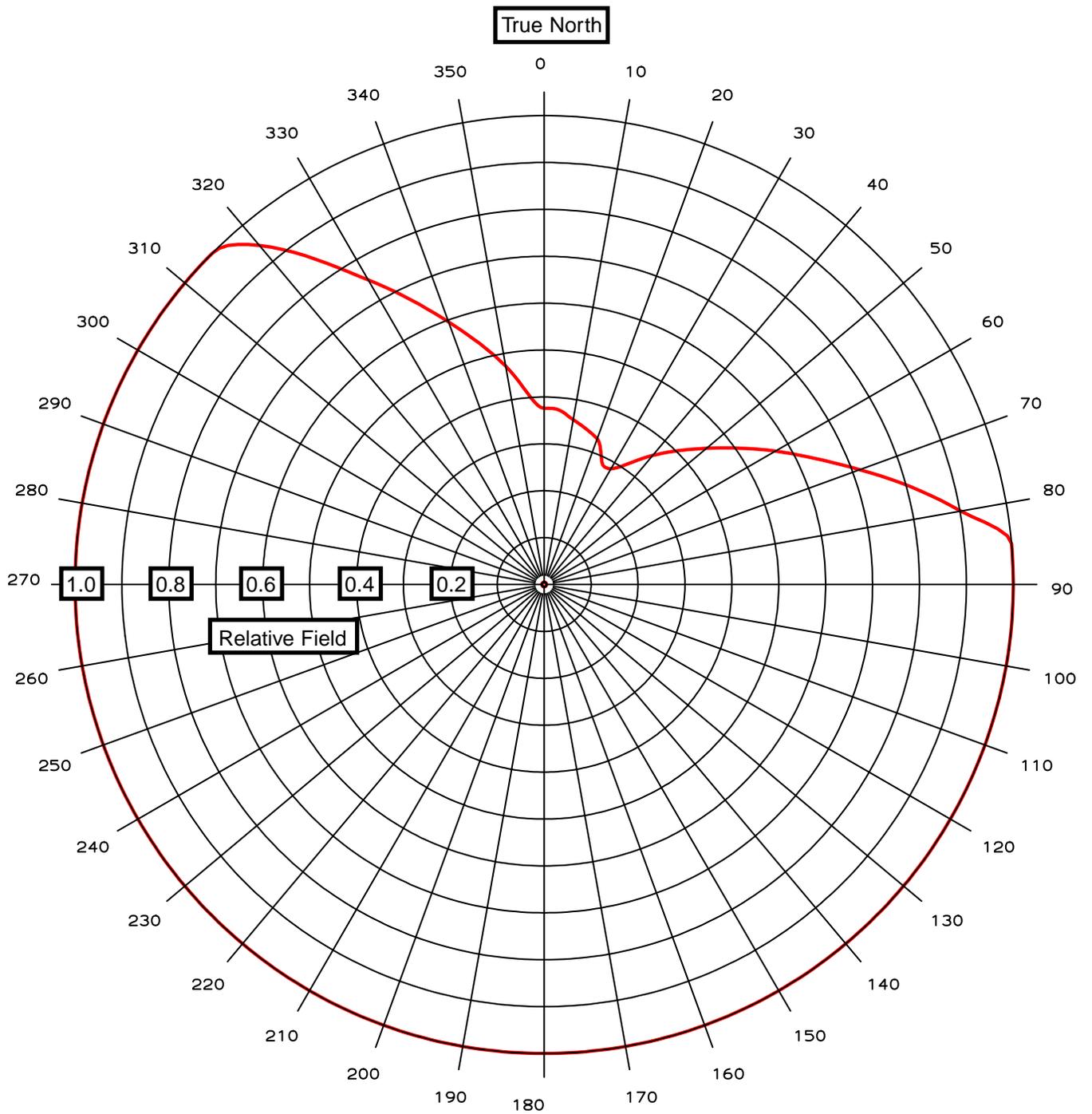


EXHIBIT 14 - FIGURE 1
HORIZONTAL PLANE RADIATION PATTERN

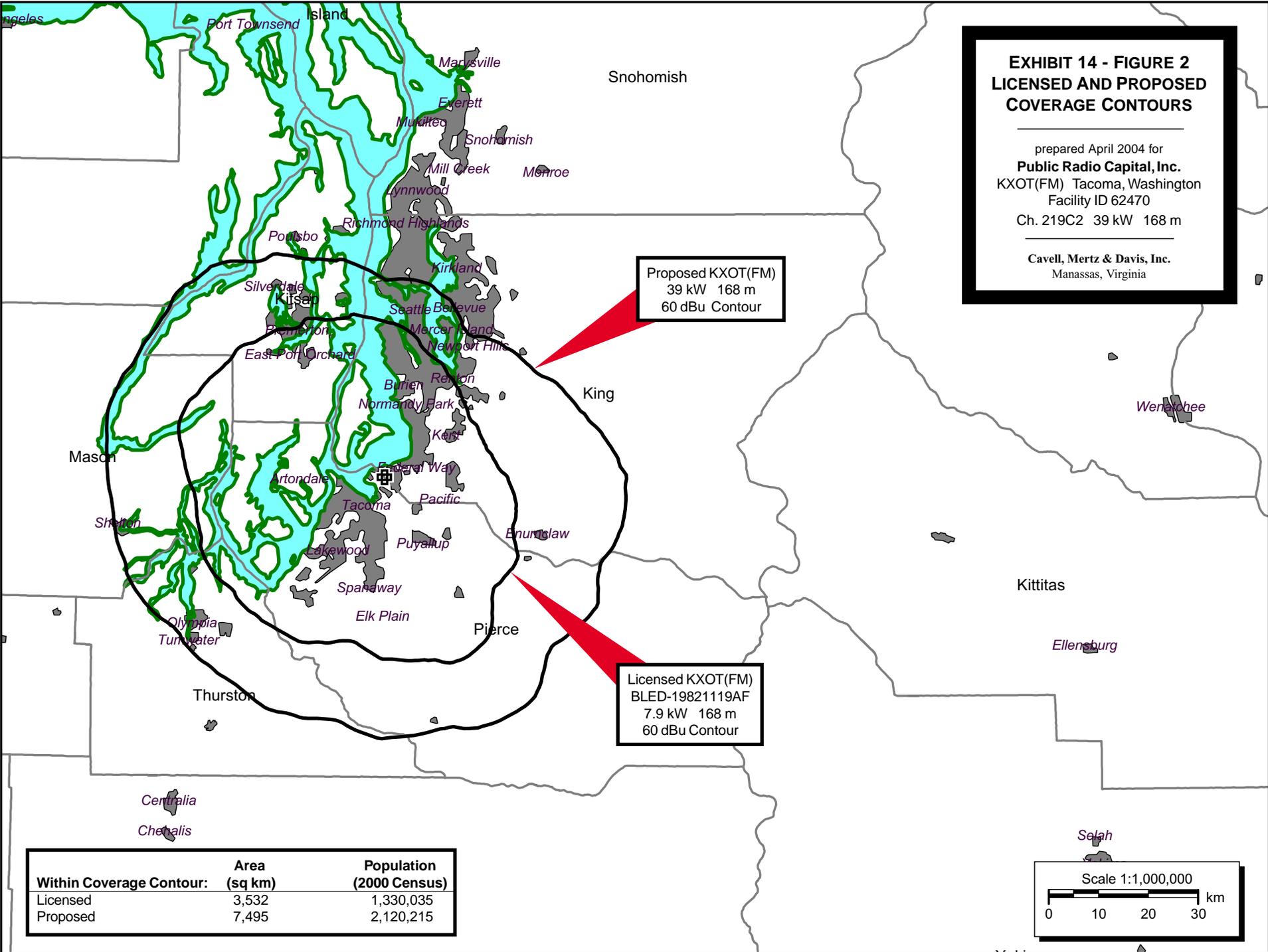
prepared April 2004 for
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Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

**EXHIBIT 14 - FIGURE 2
LICENSED AND PROPOSED
COVERAGE CONTOURS**

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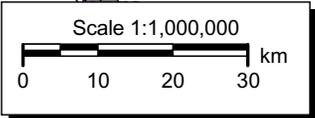
Cavell, Mertz & Davis, Inc.
 Manassas, Virginia



Proposed KXOT(FM)
 39 kW 168 m
 60 dBu Contour

Licensed KXOT(FM)
 BLED-19821119AF
 7.9 kW 168 m
 60 dBu Contour

Within Coverage Contour:	Area (sq km)	Population (2000 Census)
Licensed	3,532	1,330,035
Proposed	7,495	2,120,215



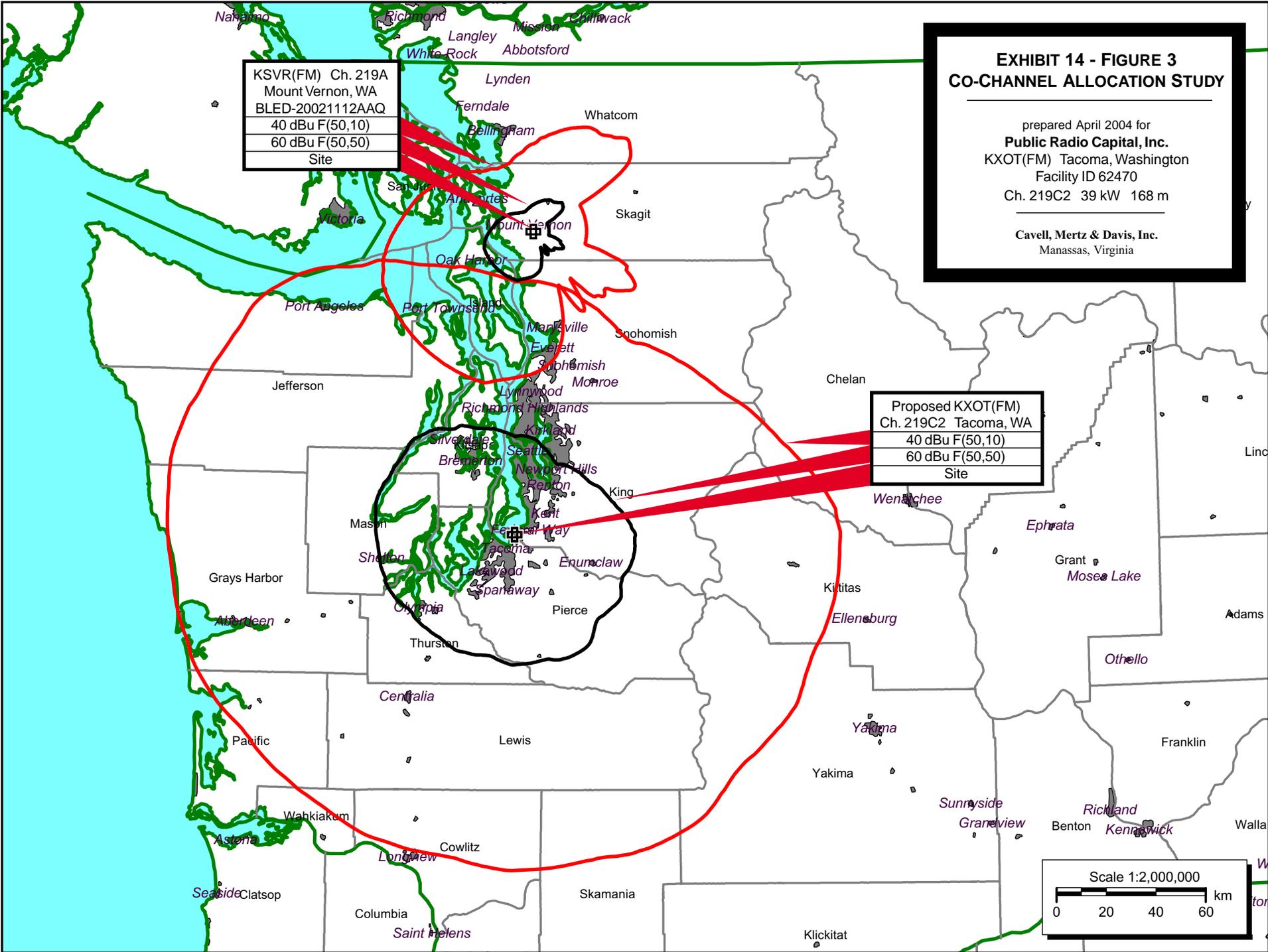
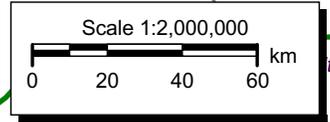
**EXHIBIT 14 - FIGURE 3
CO-CHANNEL ALLOCATION STUDY**

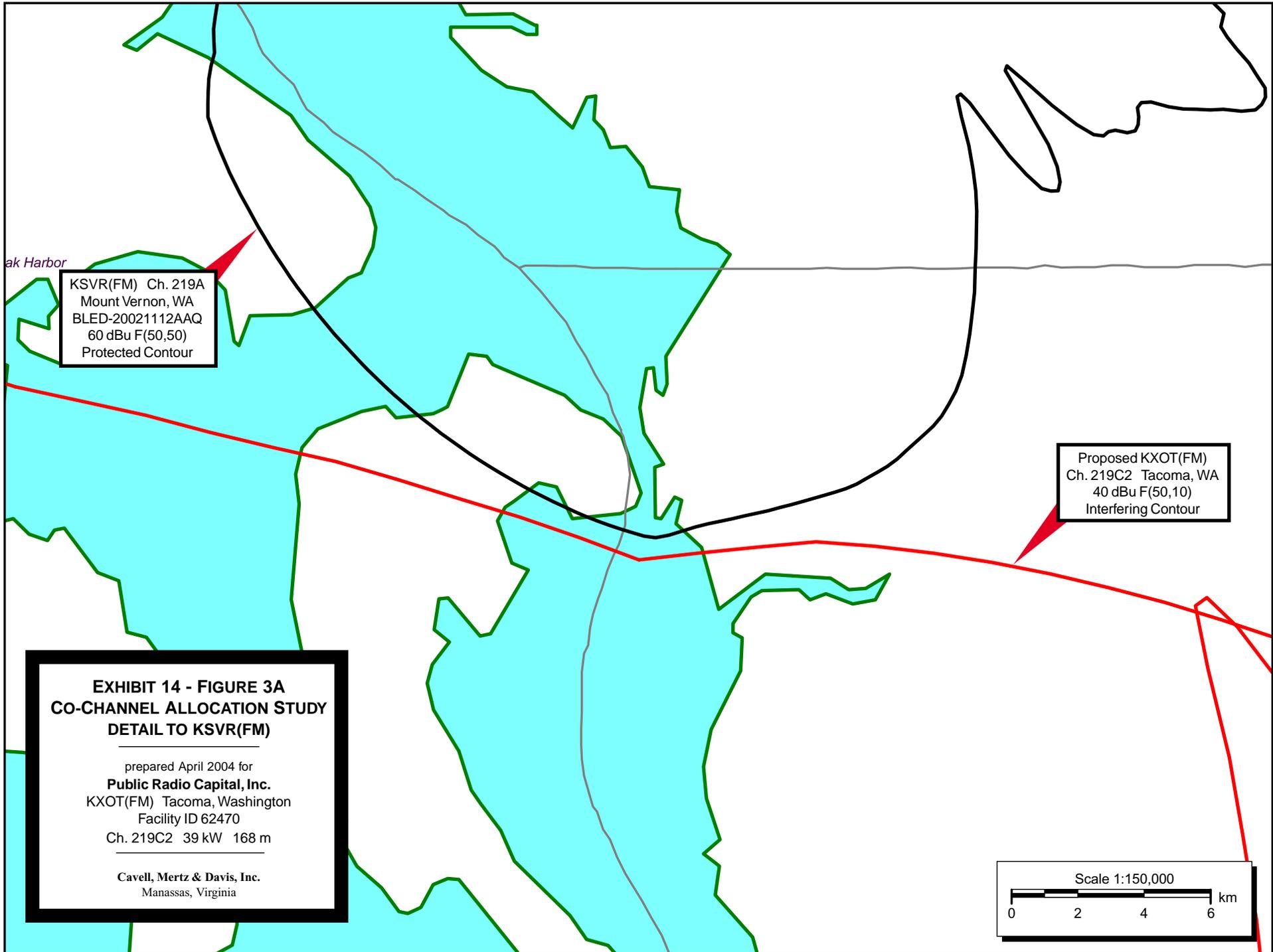
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KSVR(FM) Ch. 219A
Mount Vernon, WA
BLED-20021112AAQ
40 dBu F(50,10)
60 dBu F(50,50)
Site

Proposed KXOT(FM)
Ch. 219C2 Tacoma, WA
40 dBu F(50,10)
60 dBu F(50,50)
Site





ak Harbor

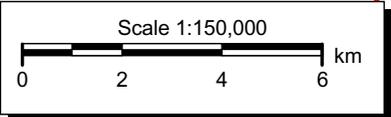
KSVR(FM) Ch. 219A
Mount Vernon, WA
BLED-2002112AAQ
60 dBu F(50,50)
Protected Contour

Proposed KXOT(FM)
Ch. 219C2 Tacoma, WA
40 dBu F(50,10)
Interfering Contour

EXHIBIT 14 - FIGURE 3A
CO-CHANNEL ALLOCATION STUDY
DETAIL TO KSVR(FM)

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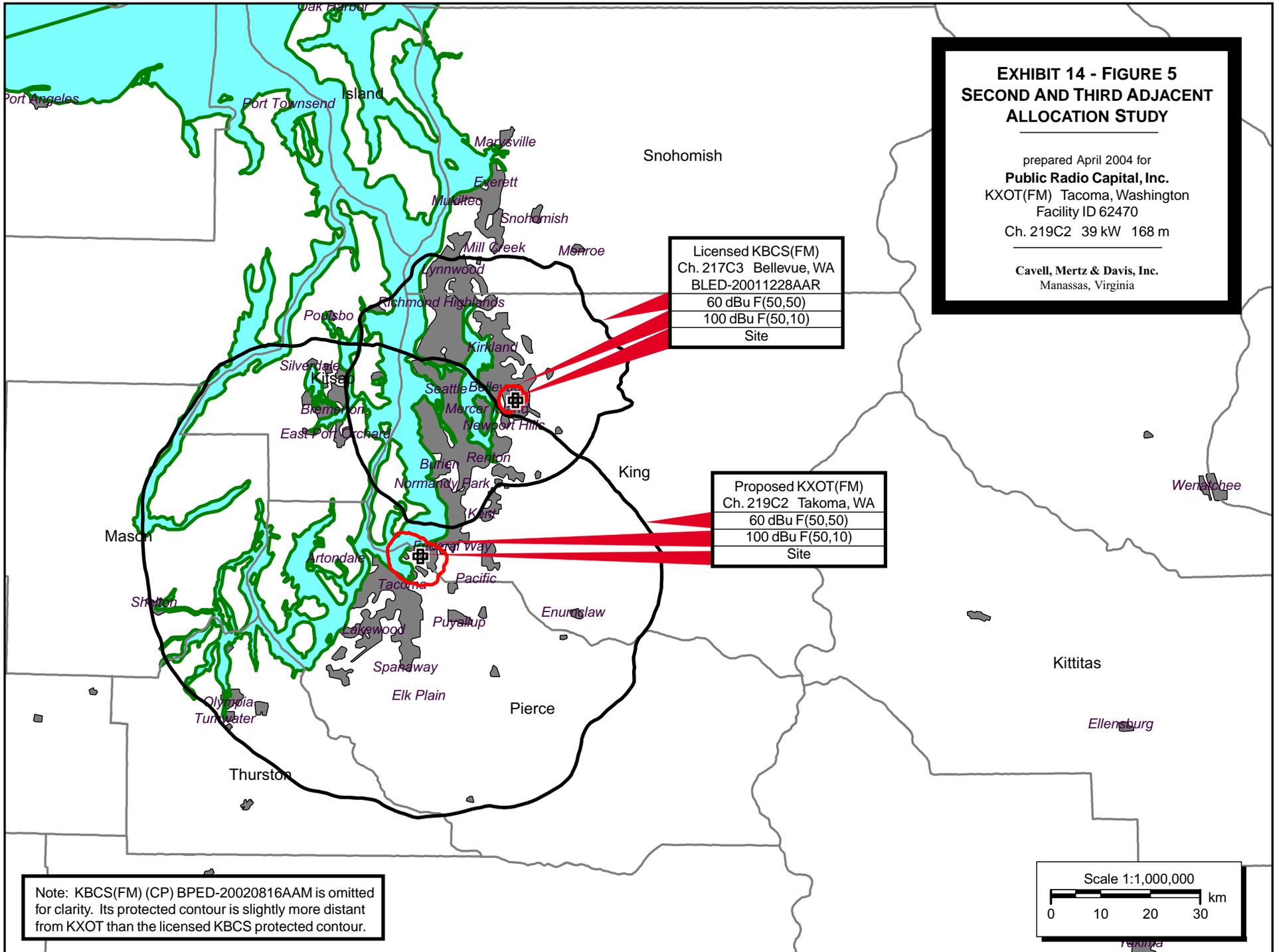
Cavell, Mertz & Davis, Inc.
Manassas, Virginia



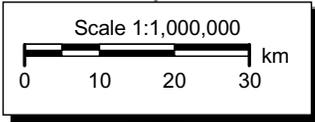
**EXHIBIT 14 - FIGURE 5
SECOND AND THIRD ADJACENT
ALLOCATION STUDY**

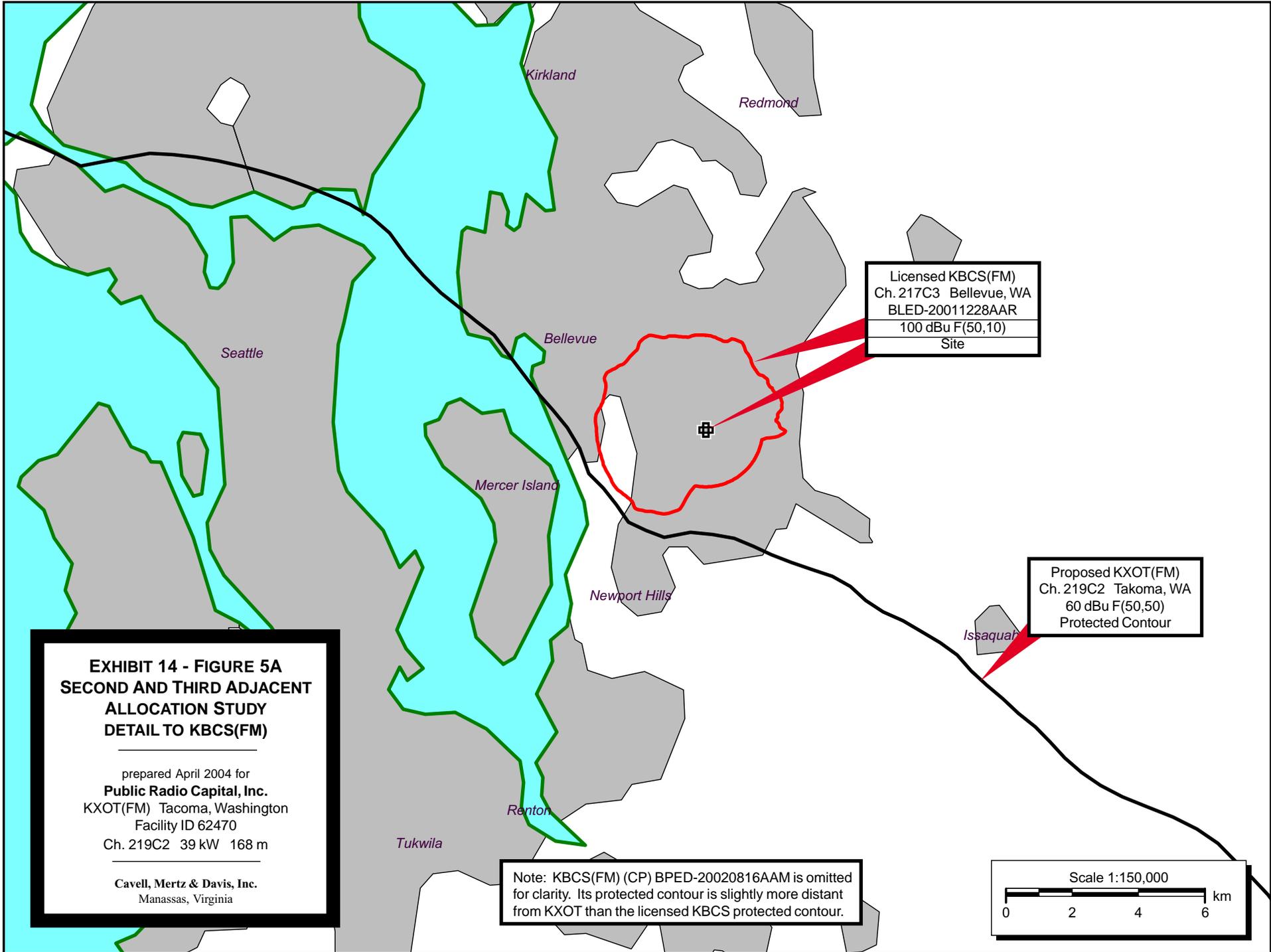
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Note: KBCS(FM) (CP) BPED-20020816AAM is omitted for clarity. Its protected contour is slightly more distant from KXOT than the licensed KBCS protected contour.





Licensed KBCS(FM)
 Ch. 217C3 Bellevue, WA
 BLED-20011228AAR
 100 dBu F(50,10)
 Site

Proposed KXOT(FM)
 Ch. 219C2 Takoma, WA
 60 dBu F(50,50)
 Protected Contour

EXHIBIT 14 - FIGURE 5A
SECOND AND THIRD ADJACENT
ALLOCATION STUDY
DETAIL TO KBCS(FM)

prepared April 2004 for
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 Ch. 219C2 39 kW 168 m

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 Manassas, Virginia

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