

**NEW FM, DELTA JUNCTION, AK****EXHIBIT 23 – NARRATIVE****ENGINEERING STATEMENT**

Radio Layne, LLC ("RLL") was selected in the final round of FM Auction No. 37 as the winning bidder for Channel 228A, serving the community of Delta Junction, Alaska (BSFH-20040805AFQ, FIN 164233; see Public Notice, DA-04-3694, Attachment A, page 1, market FM002). The instant application is the complete form 301-FM requested of all such winning bidders in the Public Notice. The RLL application also proposes an instant upgrade to Class C3.

Exhibit 23.1 contains a contour map of the predicted community coverage from the selected transmission site, which is to be located upon an existing tower (ASRN 1014788) which affords good coverage of the community of license and several adjacent communities. The RLL proposal is predicted to extend the 70 dBu contour over the entire population of the principal community, and thus MEETS the requirements of 47 CFR §73.315.

Exhibit 25 is the interference study list, which shows that the RLL proposal is fully-spaced to all allocations and assignments (they are too distant to appear on the study), and thus MEETS the requirements of 47 CFR §73.207. The proposed site is 231.0 km from the nearest point on the Canadian border, and thus does NOT clear the 320 km coordination distance. The underlying allocation has been previously accepted by the Canadian administration, and no Canadian allocations or allotments are close enough to be impacted by the RLL proposal for Class C3. The proposed site is 388.4 km from the nearest FCC monitoring site, and thus CLEARS the required coordination distance. The proposed transmission site coordinates are also the One-Step Proposal allotment coordinates (see question 4). RLL affirms that it will locate its studio in accordance with 47 CFR §73.1125.

Exhibit 30 contains the ANSI (RF safety) study. This study utilizes the OET FMMODEL program to predict RF power densities at 2 meters above ground for various distances. The maximum power density predicted to occur is approximately 15  $\mu\text{W}/\text{cm}^2$ . This value is 7.5% of the limit for uncontrolled (general population) exposure (200  $\mu\text{W}/\text{cm}^2$ ). Thus the RLL proposal MEETS the requirements of 47 CFR §1.1310. RLL further affirms that it will reduce power or suspend transmission as necessary to protect workers from radiation in excess of that permitted in the regulation. No other environmental impact from this proposal is known to exist.

The above and attached information is correct and true as to my knowledge and belief.

December 28, 2004



Gary O. Keener

