

## **Exhibit 15**

### **Allocation Narrative**

The allocation situation for the proposed station is reported on the following pages. A complete explanation of how to read the printout is shown on the page after the tabulation. Summarizing the explanation, each group of lines represents an existing or proposed full service station. Entries which have a negative number in the columns marked \*IN\* or \*OUT\* could cause interference with the proposed station.

None of the stations listed in the printout has negative values in the \*IN\* and \*OUT\* columns. This indicates that no potential for interference occurs on the line directly between the proposed facility and any of those stations where both numbers are positive.

The proposed station has been exhaustively evaluated to certify the protection of each of the stations in the tabulation where the \*IN\* or \*OUT\* contour separation is significant. In each case, a digitally generated map is provided showing the appropriate protected (thin line) and interfering (thick line) contours. In cases where the map is also inconclusive, the value of the interfering signal is tabulated along the protected contour. It is shown to not exceed the mandated value at any point on the protected contour. That tabulation is also appended to the exhibit in those cases. Since there is no point on the protected contour where the interfering signal strength exceeds the mandated value, no contour overlap exists, and no area of interference is predicted.

#### **NCE Stations**

The first two entries are for antecedents of the current application. Since they will not coexist with the current application, they need not be contour protected.

The third entry, 980810, is an application for the Coos Bay School District. For the outgoing interference from the proposed station, the map is sufficient to demonstrate the lack of prohibited overlap. The incoming interference situation appears inconclusive from the map, so a tabulation of the interfering signal from the Coos Bay School District along the protected contour of the proposed station is provided to certify the absence of prohibited contour overlap.

Maps are sufficient to certify the clearance of all the other entries.

#### **IF Spacings**

No IF spacing stations were found in the search.

#### **TV6 Protection**

There are no TV channel 6 stations within the 180 km reporting radius for channel 215.

#### **Class Contour Distance**

The proposed ERP is 2.39 kW, and the HAAT is 162.0 meters. The distance to the class contour, circled at the top of the page, is 28.42 km, which is less than the 28.4 km maximum for a class A station. This is therefore an application for a class A station.

#### **Summary**

**This allocation study shows that no interference to any existing or proposed station will be produced by granting the proposed station. It can therefore immediately proceed to be granted.**

## Exhibit 15

OR Coos Bay minor mod

REFERENCE CH# 215C1 - 90.9 MHz, Pwr= 2.39 kW, HAAT=162.0 M, COR= 221 M DISPLAY DATES  
 43 09 57 N Average Protected F(50-50)= 28.42 km DATA 01-13-05  
 124 19 38 W Ave. F(50-10) 40 dBu= 82.4 54 dBu= 42.9 80 dBu= 9.2 100 dBu= 2.5 SEARCH 01-22-05

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr (kW) HAAT (M)	COR (M) INT (km)	PRO (km) LICENSEE	*IN* (Overlap	*OUT* in km)
215C1 KJCH.C Coos Bay	CP DCN OR	169.2 349.2	23.41 BPED19980320ML	42 57 32 124 16 23	2.477 492	697 120.5	48.1 Csn International	-108.06<	-62.01*<	
215C2 KJCH.A Coos Bay	APP CX OR	169.2 349.2	23.41 BMPED20040524ALM	42 57 32 124 16 23	1.400 484	689 110.0	42.5 Csn International	-97.58<	-56.40*<	
217A 980810 Coos Bay	APP CN OR	26.5 206.5	24.43 BPED19980810MC	43 21 45 124 11 33	6.000 -8	71 1.6	15.8 Coos Bay School District 9	0.24	6.82	
213A 970909 Coos Bay	APP CN OR	32.5 212.5	29.70 BPED19970909MD	43 23 27 124 07 47	0.880 224	283 1.9	26.4 St Bd Of Higher Ed For The	6.63	1.67	
216C1 KWAX Eugene	LIC EN OR	46.1 226.1	135.05 BLED19930308KB	44 00 04 123 06 45	21.500 331	562 86.9	59.3 State Of Oregon Acting By	28.74	47.02	
06-2C KVIQ Eureka	LI HN CA	173.7 353.7	272.52 BLCT1115	40 43 36 123 58 18	100.000 558	920	125.2 Ackerley Media Group, Inc.	To Grd B=	147.33	

ERP and HAAT are on direct line to and from reference station.

\*\*\*Affixed to 'IN' or 'Out' values = site inside protected contour. "&lt;" = Contour Overlap

## HOW TO READ THE FM COMPUTER PRINT-OUT

The computer print-out should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

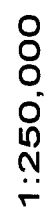
The column listed "\* IN \*" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights along the azimuths between the reference station and the database station are used and visa versa. The column labeled "\* OUT \*" shows the distance of kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing interference.

For I.F., commercial, international and other spacing based relationships, the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum required distance in kilometers, while the letter "M" in the next column follows the available clear space separation in kilometers or "Margin". Minimum commercial separation distances were taken from Sec 73.207 of the rules as amended. This procedure is also used for all Canadian and Mexican spacing. Canadian separation distances were derived from the "Canadian/American Working Agreement".

Under the "BEARING" column, the first row of numbers indicate the bearings from true north of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "INT" and "PRO" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

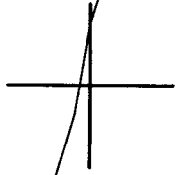
The first three letters of the "TYPE" column identify the current F.C.C. status of the stations. The fourth letter will be a "D" or "Z" (Sec. 73.215) if the facility is directional. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a 'Y' if the antenna uses beam tilt.



**Prop vs 980810**  
**Bob Moore - 01/05**

1000 d

3000 e



Bob Moore  
01-24-2005 30 Sec. Terrain Data

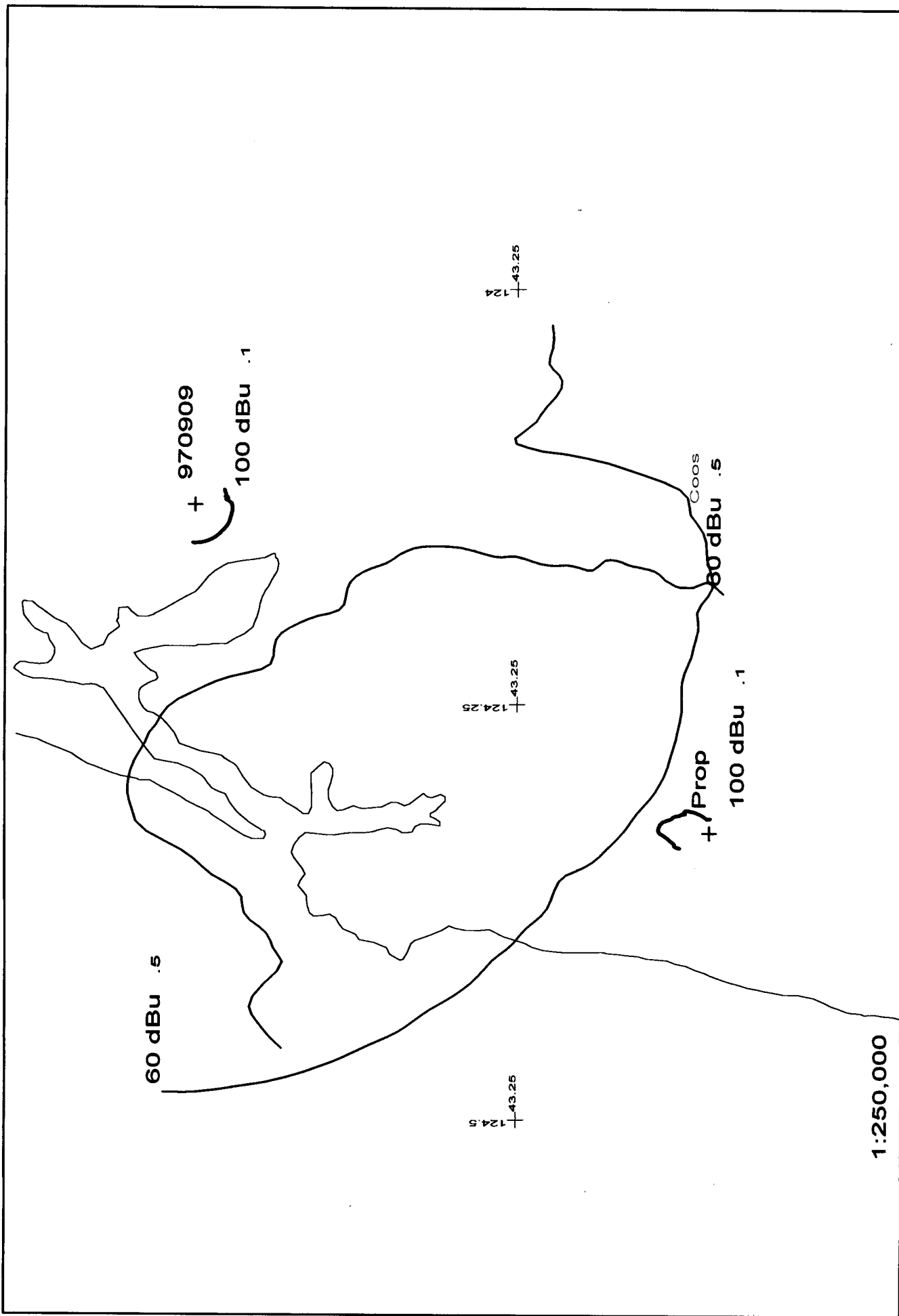
Prop BMPED20040524ALM  
Channel = 215A  
Max ERP = 2.39 kW  
RCAMSL = 221 M  
N. Lat = 430957  
W. Lng = 1241938

980810 BPED19980810MC  
Channel = 217A  
Max ERP = 6 kW  
RCAMSL = 71 M  
N. Lat = 43 21 45  
W. Lng = 124 11 33

Protected  
60 dBu

Interfering  
100 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
010.0	002.3900	0152.5	027.6	311.4	006.0000	0063.0	008.1	77.9
011.0	002.3025	0152.0	027.4	311.6	006.0000	0063.4	007.6	79.0
012.0	002.2165	0153.1	027.2	312.5	006.0000	0063.4	007.1	80.1
013.0	002.1323	0153.3	027.0	312.9	006.0000	0063.8	006.6	81.5
014.0	002.0496	0151.3	026.6	311.8	006.0000	0063.4	006.0	83.2
015.0	001.9686	0147.8	026.1	309.2	006.0000	0062.2	005.4	85.1
016.0	001.8892	0144.3	025.6	305.7	006.0000	0061.3	004.7	87.1
017.0	001.8115	0140.8	025.1	301.1	006.0000	0060.0	004.2	89.1
018.0	001.7353	0136.1	024.5	293.5	006.0000	0056.2	003.6	90.9
019.0	001.6609	0130.2	023.8	281.7	006.0000	0054.8	003.2	92.7
020.0	001.5880	0125.4	023.2	269.0	006.0000	0049.8	003.0	93.3
021.0	001.5234	0124.1	022.9	259.7	006.0000	0039.3	002.8	92.5
022.0	001.4601	0127.1	022.9	254.9	006.0000	0024.3	002.4	92.5
023.0	001.3981	0131.8	023.0	250.9	006.0000	0016.2	002.0	95.8
024.0	001.3375	0135.8	023.1	243.4	006.0000	0016.1	001.7	98.7
025.0	001.2782	0137.5	023.0	229.6	006.0000	0014.7	001.6	99.8 <-
026.0	001.2203	0137.5	022.7	213.9	006.0000	-0008.3	001.7	98.7
027.0	001.1637	0136.9	022.4	201.6	006.0000	-0016.9	002.0	96.1
028.0	001.1084	0136.2	022.1	192.9	006.0000	0008.3	002.4	93.1
029.0	001.0545	0134.9	021.8	187.4	006.0000	0002.6	002.8	89.7
030.0	001.0020	0132.7	021.4	184.1	006.0000	-0007.6	003.4	86.6
031.0	000.9612	0131.4	021.1	181.2	006.0000	-0004.6	003.8	84.4
032.0	000.9212	0133.2	021.0	177.3	006.0000	-0012.2	004.1	83.3
033.0	000.8821	0138.0	021.1	172.2	006.0000	-0022.2	004.2	82.7
034.0	000.8439	0143.4	021.3	167.1	006.0000	-0027.7	004.3	82.2
035.0	000.8065	0147.5	021.3	163.4	006.0000	-0016.7	004.6	81.2
036.0	000.7699	0150.0	021.3	161.3	006.0000	-0022.3	004.9	80.1
037.0	000.7342	0151.4	021.1	160.3	006.0000	-0029.2	005.3	78.9
038.0	000.6994	0152.0	020.9	160.0	006.0000	-0029.2	005.7	77.5
039.0	000.6654	0152.3	020.7	160.1	006.0000	-0029.2	006.1	76.3
040.0	000.6322	0153.0	020.5	160.0	006.0000	-0029.2	006.6	75.2



<p>Prop vs 970909 Bob Moore - 01/05</p>	<p>Prop 215A 2.39kW 221M AMSL 970909 213A .88kW 283M AMSL</p>	<p>Scale in km 0 10 20</p>
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