Broadcast Engineering Services of Bonny Doon, Inc.

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Engineering Statement
Minor Change to K265ET
Princeville, Hawaii
BNPFT-20130813AAI

Ohana Broadcast Company LLC (Ohana) is requesting a modification to the construction permit for K265ET, in accordance with the Revitalization of the AM Service, First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, FCC 15-142, ¶ 13 (rel. October 23, 2015) ("AMR Order") and DA-1491 (released on Dec. 23, 2015).

Ohana requests a change to the location, effective radiated power and operating frequency of the construction permit for K265ET to 104.5 MHz (Ch 283). This would become a fill-in translator for co-owned KUAI-AM Lihue, Hawai`i (BL-20130703AFP - Facility ID 58938, a Class B AM facility). The proposed 60 dbu contour of this translator proposal is fully encompassed by the KUAI-AM 2mV/M contour.

A power increase to 250 watts, utilizing a non-directional antenna is requested. New site coordinates and RCAMSL are also requested. The new site is 17.12 miles from the currently authorized site of this translator, well within the 250 mile limitation. This site is co-located and adjacent with the KUAI-AM tower. The new city of license will be Lihue, Hawai`i.

An allocation study, attached to this engineering statement, reveals no conflicts with existing or proposed stations. The proposed site itself is located on rural agricultural land, within private property. The support structure is an existing 20 meter wood pole, adjacent to the 123.7 meter registered tower (1049182), the KUAI-AM tower. The proposed antenna is an existing emergency antenna, and has been in place for a number of years, and was taken into account when base impedance measurements of KUAI-AM were made in 2015. No change in the operating parameters of KUAI-AM were noted at the time.

The proposed antenna system is a Nicom BKG77-2, a circularly polarized non-directional design. This antenna, mounted at 18 meters above ground, will produce a calculated worst-case RFR energy field of 9.3 microwatts per squared centimeter at a distance of 11 meters from the base of the tower support structure. This is under 1% of the public limit, and is therefore compliant with the FCC rules concerning RFR both on and adjacent to the proposed tower location.

This site is fenced and isolated on private property, and not readily accessible by the general public.

Respectfully submitted,

Donald E. Mussell Jr. NCE-CBT
Consulting Engineer
June 29, 2016

Broadcast Engineering Services of Bonny Doon, Inc.
Don Mussell NCE-CBT

KUAI-X
Ohana Broadcast Company Llc

REFERENCE CH# 283D - 104.5 MHz, Pwr= 0.25 kW, HAAT= 23.2 M, COR= 200 M
21 59 31.0 N. Average Protected F(50-50)= 7.09 km
159 24 21.0 W. Omni-directional

DISPLAY DATES
DATA 07-26-16
SEARCH 07-28-16

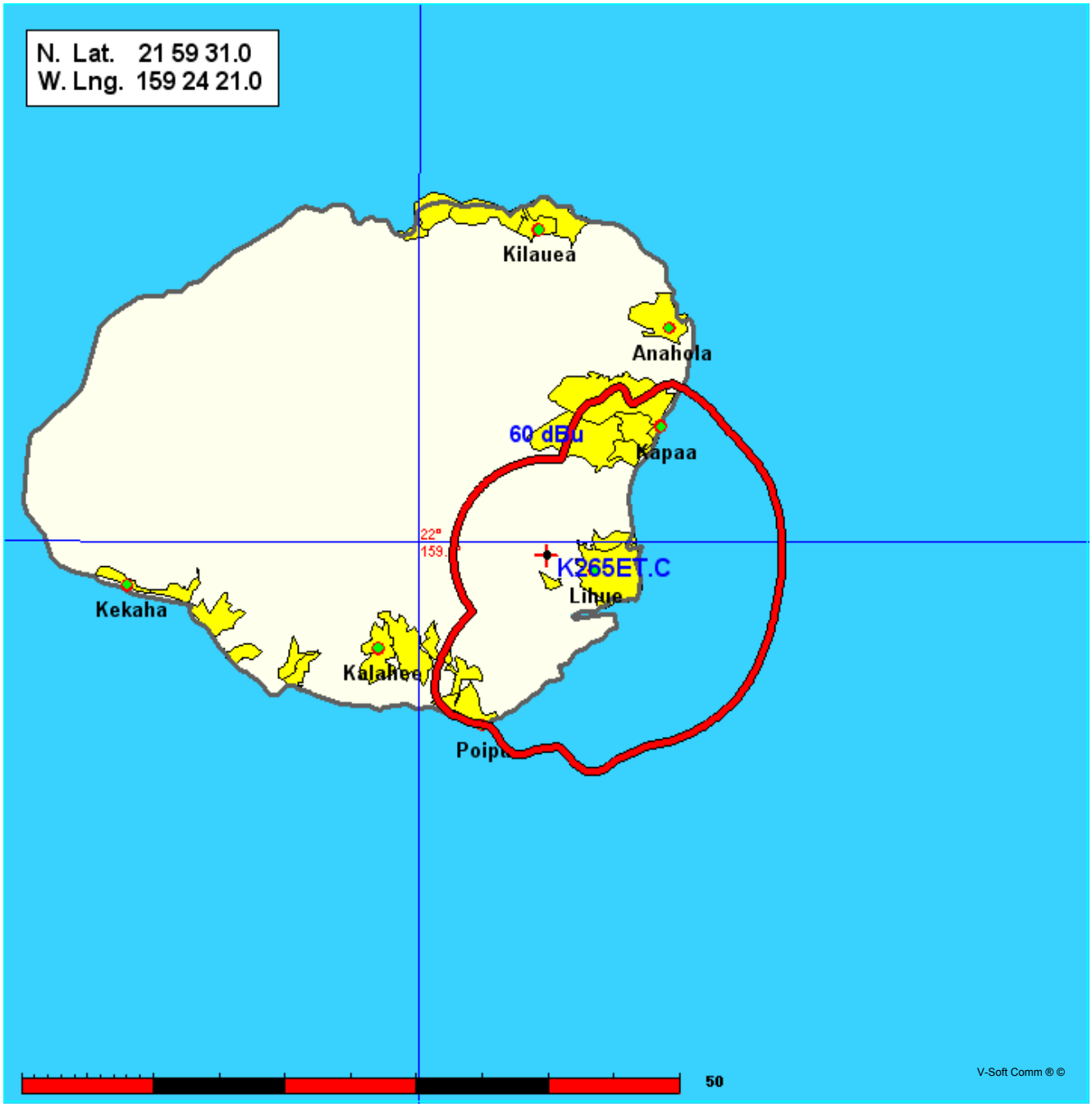
CH CITY	CALL STATE	TYPE ANT <--	AZI DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
280D Princeville	K280EZ HI	LIC _H_ 159.7	339.7 27.57 BLFT20040817ABL	22 13 31.0 159 29 57.0	0.008 -163	0.2 46	3.0 Ohana Broadcast Company Ll	19.2	23.5
282C Kaneohe	KPHW HI	LIC _CX 293.7	113.0 185.75 BMLH20130125AEB	21 19 49.0 157 45 24.0	75.000 645	118.3 771	79.4 Sm-kphw, Llc	49.7	74.9

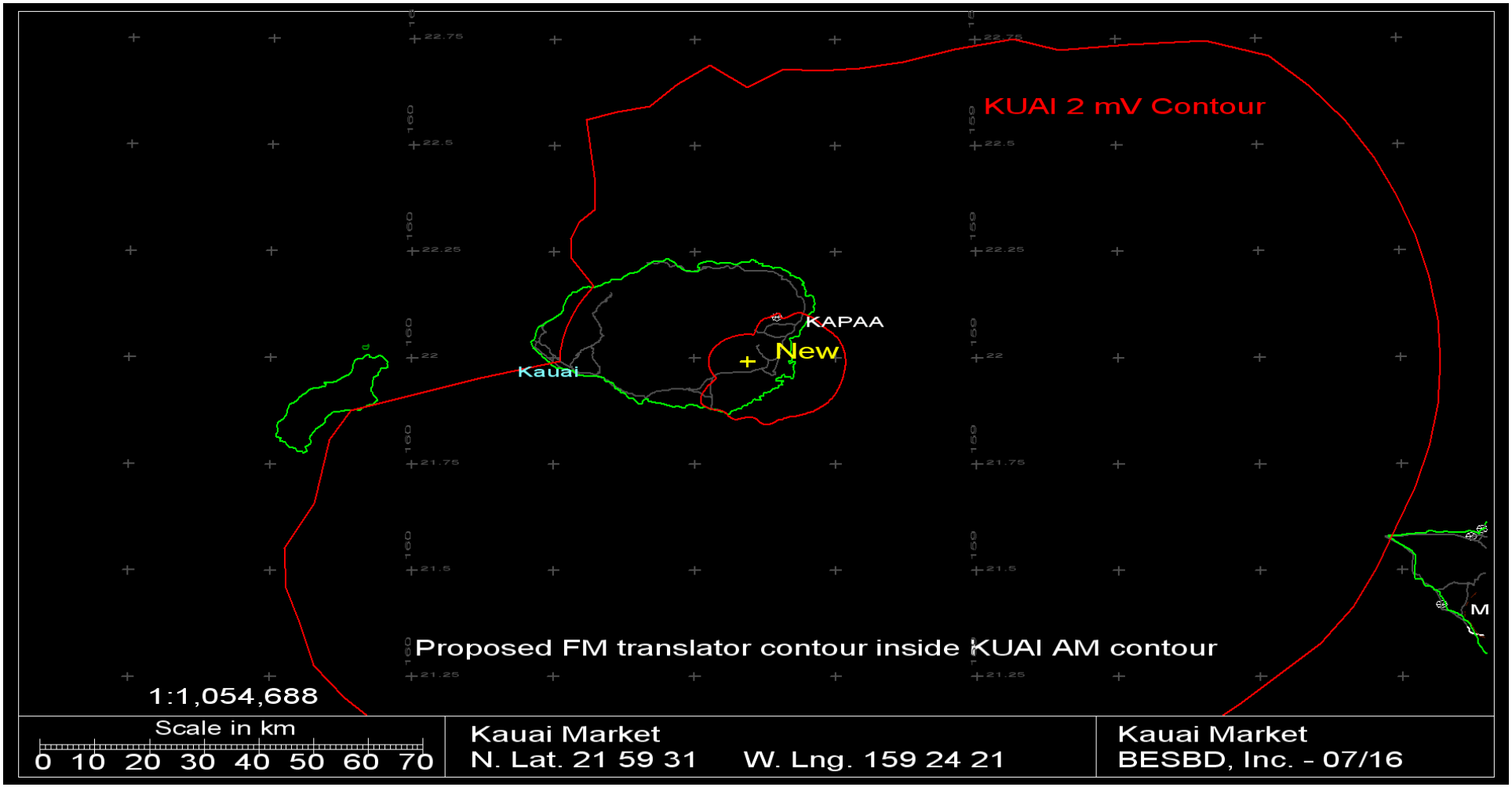
Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
Reference station has protected zone issue: AM tower

KUAI-X
Ohana Broadcast Company Llc

Coverage Study - FCC NGDC 30 Sec
07-29-2016

K265ET CH283 D , 0.25 kW, 23.2m HAAT, 200.0m COR AMSL
Service Contour = 60 dBu. Population = 34,514



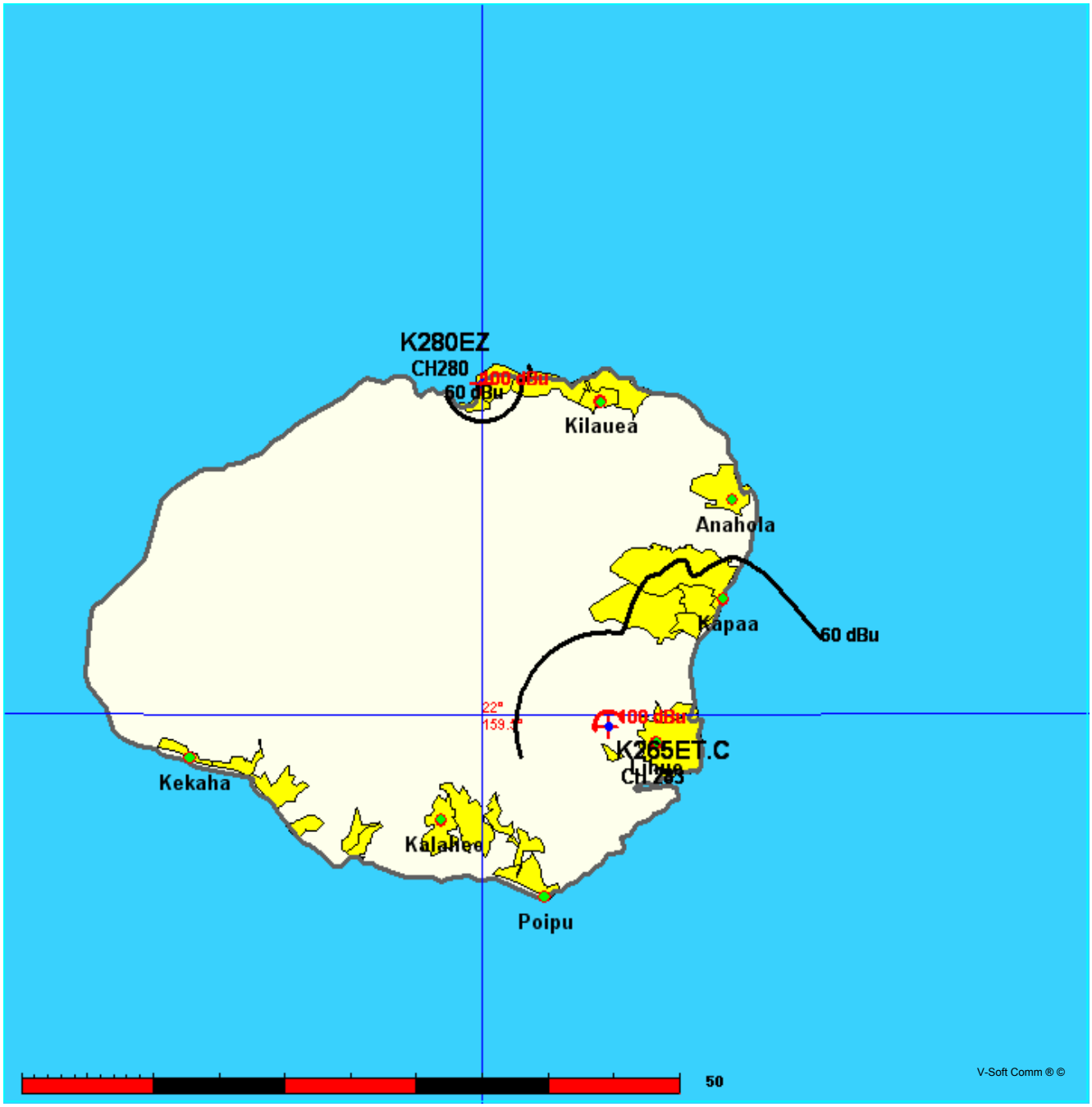

KUAI 2 mV Contour
KAPAA
New
Kauai
Proposed FM translator contour inside KUAI AM contour
1:1,054,688
Scale in km
0 10 20 30 40 50 60 70
Kauai Market
N. Lat. 21 59 31 W. Lng. 159 24 21
Kauai Market
BESBD, Inc. - 07/16

KUAI-X
Ohana Broadcast Company Llc

FMCommander Single Allocation Study - 07-29-2016 - FCC NGDC 30 Sec
K265ET.C's Overlaps (In= 19.16 km, Out= 23.5 km)

K265ET.C CH 283 D
Lat= 21 59 31.0, Lng= 159 24 21.0
0.25 kW 23.2 m HAAT, 200 m COR
Prot.= 60 dBu, Intef.= 100 dBu

K280EZ CH 280 D BLFT20040817ABL
Lat= 22 13 31.0, Lng= 159 29 57.0
0.008 kW -162.5 m HAAT, 46 m COR
Prot.= 60 dBu, Intef.= 100 dBu

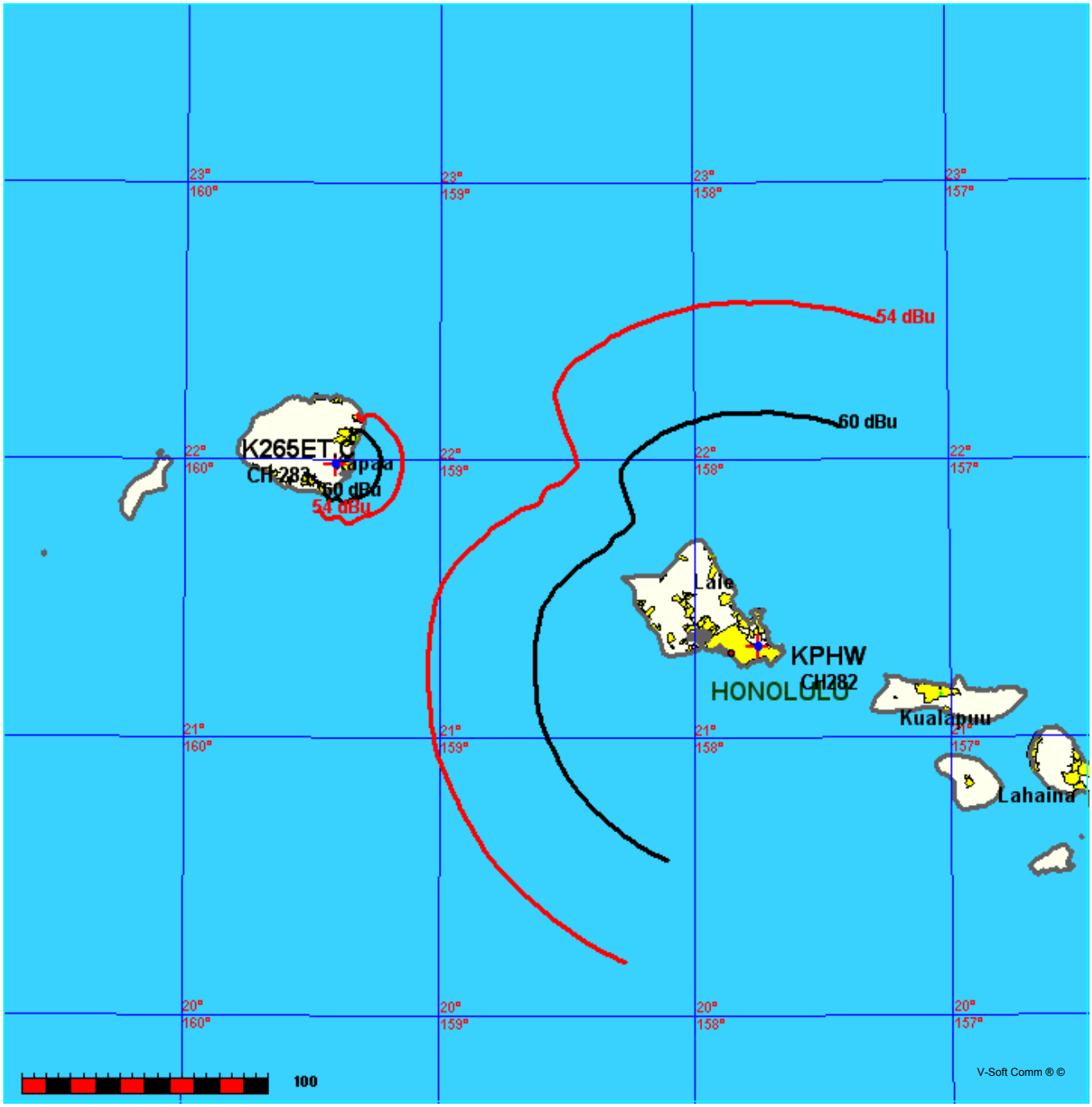


KUAI-X
Ohana Broadcast Company Llc

FMCommander Single Allocation Study - 07-29-2016 - FCC NGDC 30 Sec
K265ET.C's Overlaps (In= 49.73 km, Out= 74.93 km)

K265ET.C CH 283 D
Lat= 21 59 31.0, Lng= 159 24 21.0
0.25 kW 23.2 m HAAT, 200 m COR
Prot.= 60 dBu, Intef.= 54 dBu

KPHW CH 282 C BMLH20130125AEB
Lat= 21 19 49.0, Lng= 157 45 24.0
75.0 kW 645 m HAAT, 771 m COR
Prot.= 60 dBu, Intef.= 54 dBu



AFFIDAVIT AND QUALIFICATIONS OF
DONALD E. MUSSELL JR.

State of Hawaii)
Kilauea)
County of Kauai)

Donald E. Mussell Jr. affirms that he is a consulting radio and electronics engineer; that he is Certified as a Broadcast Engineer, Class 1, by the National Association of Radio and Telecommunications Engineers, Inc., License #E1-00619, issued in 1985;

That he is recognized as a Broadcast Technologist by the Society of Broadcast Engineers, License # 22301, and a member of the Society of Broadcast Engineers since 1980;

That he held a First Class Radiotelephone License from 1975 until 1985, when it was replaced by a lifetime General Class Radiotelephone license (PG-12-20588), issued by the Federal Communications Commission in January of 1985;

That he has submitted many applications to the Federal Communications Commission for broadcast and auxiliary broadcast construction permits and licenses, and that his experience in Radio and Television broadcast engineering extends over four decades;.

That he declares, under penalty of perjury, that the foregoing engineering exhibits were prepared by him or under his direction and supervision; and that the statements contained therein are true and correct to the best of his belief and knowledge.

Donald E. Mussell Jr. NCE-CBT
Consulting Engineer
July 29, 2016