

NEW 279C3, FLAGSTAFF, AZ**EXHIBIT 22 - NARRATIVE****ENGINEERING STATEMENT**

Tower Investment Trust, Inc. ("TI") is an applicant in FM Auction 62 for a new FM broadcast station at Flagstaff, Arizona (BSFH-20050811AEQ, Facility ID 165966; see Attachment A to the relevant Public Notice, DA 05-1598, page A-1, FM005). Staff has determined TI to be the winning bidder for this permit, and TI is therefore required to submit a complete 301-FM. The instant application is a response to that requirement.

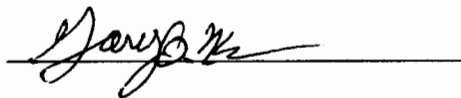
Exhibit 23 is a contour map of the community coverage from the TI proposal, showing that the proposed 70 dBu contour covers the entire community of license (2000 Census, block data; contours calculated pursuant to 47 CFR §73.313). The TI proposal clears the coordination distances to both international borders and all monitoring stations and radio observatories.

Exhibit 25 contains the interference study list, showing that the TI proposal clears all other records in the database, with the exception of KAJM-LIC, Payson, Arizona, and the accompanying allocation. KAJM holds a construction permit to move to Camp Verde, Arizona (see BMPH-20041124AAZ, Facility ID 52818), which will remove the spacing conflict seen in the study list. TI respectfully requests that the instant application be granted contingent on the subsequent issuance of a license to cover the KAJM permit.

TI affirms that it will locate the studio in accordance with 47 CFR §73.1125. Exhibit 30 contains a radio frequency radiation study of the TI proposal, showing that it meets the requirements of 47 CFR §1.1310 and OET 65A. No other environmental impacts are known to exist from this proposal. TI affirms that it will cease transmission as necessary to prevent RF exposure to workers in excess of the regulation.

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

February 20, 2006



Gary O. Keener