

ENGINEERING STATEMENT

This engineering data contained herein have been prepared on behalf of ENLANCE ADVENTISTA, permittee of a new LPFM station on Channel 251 in St. Paul, Minnesota, in support of this application for modification Construction Permit (BNPL-20131115AFJ). The purpose of this application is to specify a slightly different site.

It is proposed to mount a one-bay antenna on a pole on top of the roof of a building, such that the antenna center of radiation will be situated 11 meters above ground. The predicted service contour of the newly proposed facility is plotted in Exhibit B. A second-adjacent-channel waiver request with respect to station KTIS-FM is provided in Exhibit C. A new power density calculation is provided in Exhibit D.

Due to the fact that the overall height of the existing building will be increased by only 15 feet, the FAA has not been notified of this application and FCC antenna structure registration is not required.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KEVIN T. FISHER

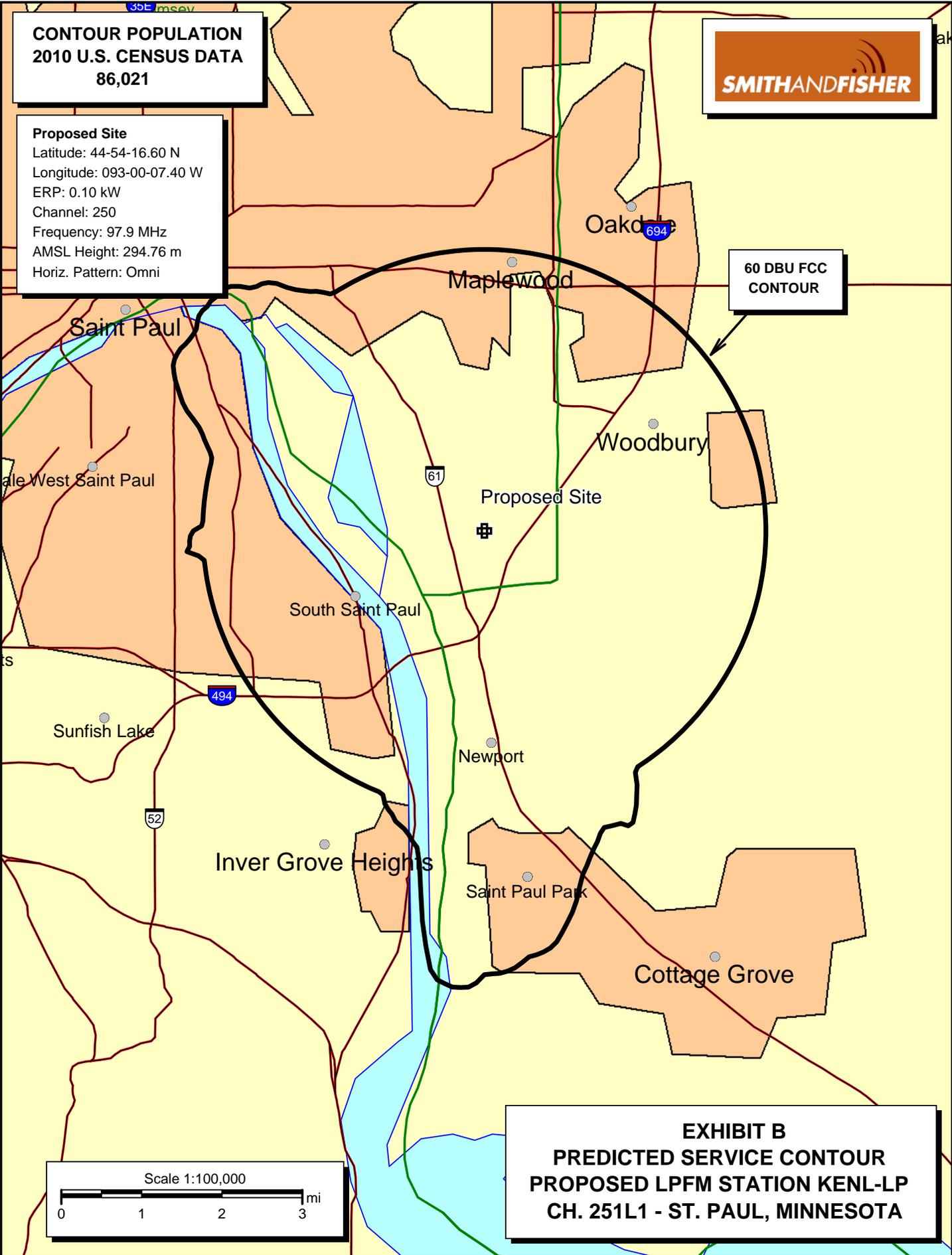
September 2, 2015

**CONTOUR POPULATION
2010 U.S. CENSUS DATA
86,021**



Proposed Site
Latitude: 44-54-16.60 N
Longitude: 093-00-07.40 W
ERP: 0.10 kW
Channel: 250
Frequency: 97.9 MHz
AMSL Height: 294.76 m
Horiz. Pattern: Omni

**60 DBU FCC
CONTOUR**



**EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED LPFM STATION KENL-LP
CH. 251L1 - ST. PAUL, MINNESOTA**

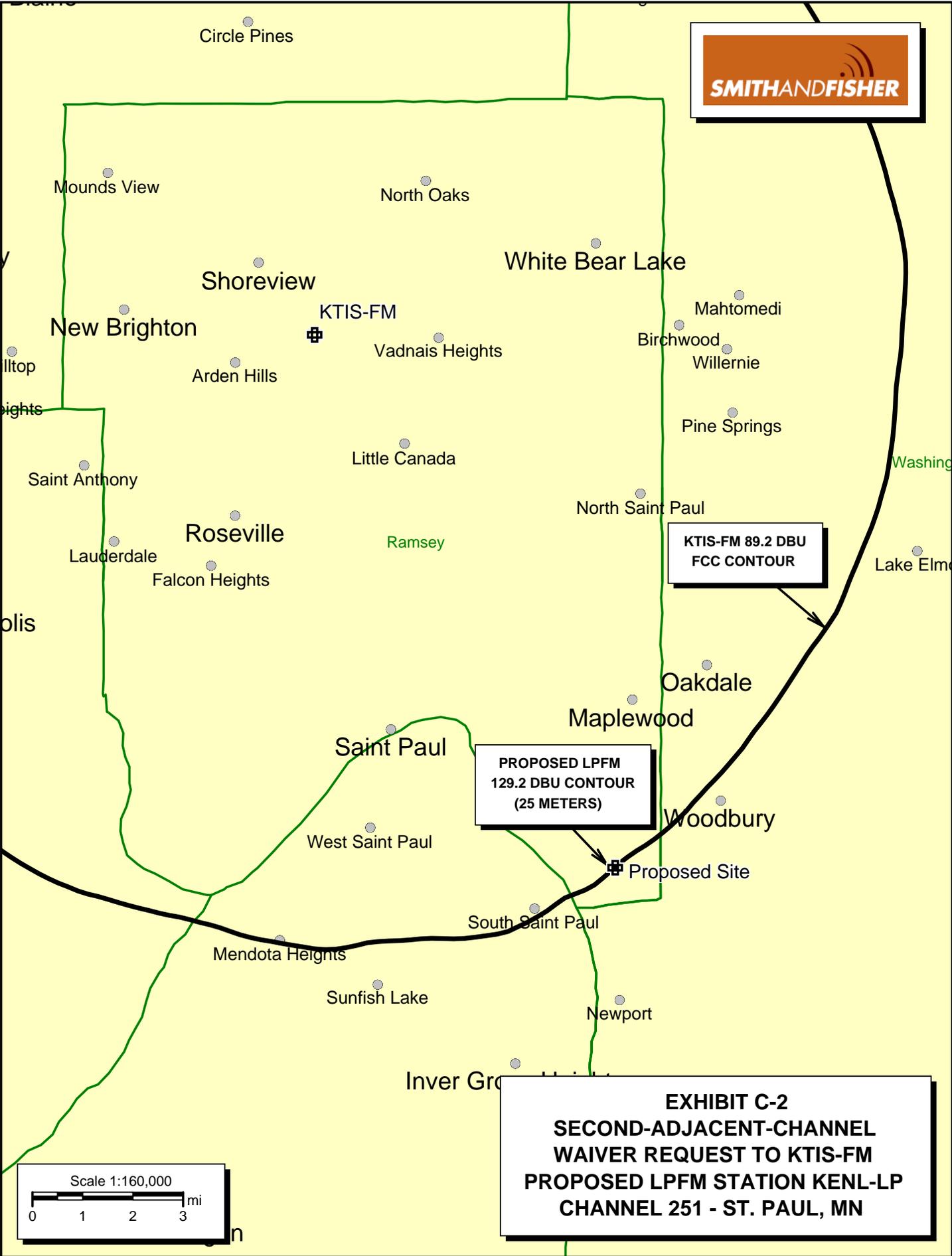
REQUEST FOR WAIVER OF SECOND-ADJACENT-CHANNEL SPACING RULE
PROPOSED LPFM STATION KENL-LP
CHANNEL 251 – ST. PAUL, MINNESOTA
[MODIFICATION OF BNPL-20131115AFJ]

The proposed LPFM site is located 19.6 kilometers from that of KTIS-FM. Since the required spacing to this station is 84 kilometers, a waiver of the Commission's spacing rules with regard to this station is requested and believed to be justified for the reasons stated below.

In Exhibit C-2, we have plotted the newly proposed LPFM site. As shown, the 89.2 dBu contour of KTIS-FM passes close to the proposed site. Based on the 40 dB desired-to-undesired ratio applied to second-adjacent-channel situations such as this, the proposed LPFM 129.2 dBu interference contour extends only 25 meters from the antenna, if one assumes an ERP of 100 watts at all elevation angles.

Since there are no houses within 25 meters of the proposed site, as shown in Exhibit C-3, operation of the LPFM station will not cause any predicted interference to anyone living in the area surrounding the transmitter site.

As a result, a waiver of the FCC's 2nd-adjacent-channel spacing Rule with regard to KTIS-FM is respectfully requested and believed to be justified.

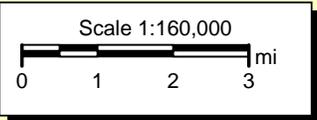


KTIS-FM

KTIS-FM 89.2 DBU
FCC CONTOUR

PROPOSED LPFM
129.2 DBU CONTOUR
(25 METERS)

EXHIBIT C-2
SECOND-ADJACENT-CHANNEL
WAIVER REQUEST TO KTIS-FM
PROPOSED LPFM STATION KENL-LP
CHANNEL 251 - ST. PAUL, MN





Google earth



POWER DENSITY CALCULATION
PROPOSED LPFM STATION KENL-LP
CH. 251 – ST. PAUL, MINNESOTA
[MODIFICATION OF BNPL-20131115AFJ]

Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 100 watts (H,V), an antenna radiation center 11 meters above ground, and assuming a vertical relative field value of 40 percent at the steeper elevation angles for the proposed antenna, maximum power density two meters above ground of 0.013 mW/cm^2 is calculated to near the base of the tower. Since this is only 6.6 percent of the 0.20 mW/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating in the FM band, a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing electromagnetic radiation.