

Engineering Statement in Support of Change to the Community of License

Introduction

San Joaquin Broadcasting requests a community of license change for KLVS from Stockton, California to Livermore, California.

This statement is included to show that the proposed community of license change to the current licensed station of KLVS Stockton, CA, will not leave any area underserved according to the guidelines of 307(b).

Discussion

In the instructions for the new Form 301, the FCC describes several points that are required for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b). Those requirements have been divided into the two sections below:

1. Minimum Requirements

The commission has requested that any 307(b) showing contain the following minimum information:

- The number of stations licensed to the current community of license is seven (7). The number of stations licensed to the proposed community of license is one (1).
- The number of stations providing service to the current community of license is 33. The number of stations providing service to the proposed community of license is 49.
- The population of the proposed community of license is 73,345.
- Livermore, California was incorporated April 1st, 1876. Livermore is a thriving and independent community. Livermore has its own school district, fire department, police department, and city government and is home to churches, shopping, libraries, and many other services. For further information, please visit <http://www.ci.livermore.ca.us/>. Furthermore, KKIQ(FM) is currently licensed to Livermore, California, hence Livermore is a licensable community.

2. Other Relevant Information

A. No Change in Service/Number of Aural Services

The current KLVS facility does not serve the community of Stockton, CA with an FCC F(50/50) 70dbu signal strength contour. Exhibit 32-A shows the relation between the current community of license and the requested community of license city of Livermore, CA. As can be seen, the currently authorized facility will provide adequate coverage to Livermore but does not provide 70dbu coverage to Stockton. Moving KLVS from Stockton to Livermore will bring the station into compliance with 73.315 and place an adequate and listenable

protected signal over Livermore – something KLVS could not do at Stockton.

The proposed community of license change request does not include a transmitter move and KLVS will function as specified in its current license.

Conclusion

Since the transmitter properties will not change, the entire area within the contour of KLVS will remain the same thus no underserved area will be created or currently served area affected.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Velasquez", with a stylized flourish at the end.

David Velasquez
Technical Consultant
August 26, 2010

Exhibit 33-A

KLVS

BMLH20060721AAP

Latitude: 37-49-17 N

Longitude: 121-46-49 W

ERP: 8.10 kW

Channel: 297

Frequency: 107.3 MHz

AMSL Height: 713.0 m

Elevation: 679.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

