

**ENGINEERING REPORT RE
MAJOR CHANGE APPLICATION OF AM STATION
KGDP, OILDALE, CALIFORNIA
660 kHz – 2.5 N / 2.5 D kW – DA-2
OCTOBER 2004**

*Exhibit 11 - FCC Form 301, Section III-AM Engineering
Technical Specifications*

INTRODUCTION

This engineering report has been prepared on behalf of Radio Representatives, Inc., licensee of radio station KGDP(AM), Orcutt, California and is in support of an application for major modification to its licensed facilities. KGDP(AM) is currently licensed for operation on 660 kHz with 10 kW power during daytime and 1 kW during nighttime utilizing different directional antenna systems. Both modes of operation are authorized for two tower directional arrays. KGDP is currently operating under a Special Temporary Authorization (STA) from an interim site with 2.5 kW daytime and 0.25 kW nighttime with a non-directional antenna.

KGDP has proposed a major modification of its facilities during the January filing window and has been assigned file number BMJP-20040129ANK. The FCC has determined the application to be a singleton and has requested the complete technical proposal in FCC Form 301.

This instant application has been prepared in accordance with the applicable Commission's AM Rules and requests a modification of the KGDP(AM) license for a change in principal community, antenna site and operation with a daytime and nighttime power of 2.5 kW utilizing a four tower directional antenna system.

ANTENNA SITE

The proposed antenna site is located northwest from Mountain Road, approximately 11 km north of Bakersfield, Kern County, California. The geographic coordinates (NAD-27) corresponding to the center of the KGDP proposed directional antenna array are as follows:

North Latitude: 35° 27' 11"

West Longitude: 118° 56' 35"

A USGS 7.5 minute series topographic map showing the existing site is included with this application.

DAYTIME ALLOCATION SITUATION

The proposed 2.5 kW directional daytime operation of KGDP will not cause any prohibited contour overlap with any authorized or proposed stations operating on 660 KHz and within plus or minus three channels. Therefore, the KGDP proposal is consistent with Section 73.37 of the Commission's Rules concerning prohibitive contour overlap. Detailed maps portraying the contours of KGDP and stations involved in the 660 KHz allocation situation are attached as Exhibits 15-B, 15-C, 15-D, 15-E and 15-F.

Station KGDP has conducted numerous field strength measurements to support its earlier applications. This measurement data has been utilized where applicable as well as measurements contained in the antenna proofs for stations KIRN (licensed), KSTE, Rancho Cordova and station KAFY, Bakersfield, CA that is located in close proximity to the proposed transmitter site of KGDP.

In addition, operating under a special field test authorization (KG6XDP), KGDP has conducted field strength measurements from a transmitter site in the nearby vicinity of the authorized operation of KIRN, Semi Valley, CA. The aforementioned measured data on file is not being re-submitted, but is referred to in the attached Exhibit 15. The new measurement data including the results of the special field tests is attached as Appendix A and includes the tabulation and graphical analysis of the data. The facilities for the special field tests were constructed by or under the supervision of Mr. Norwood Patterson, a long-standing radio consulting engineer whose qualifications are a matter of record with the FCC. Similarly, the field strength measurements were conducted by Mr. Patterson or under his direct supervision.

The values of conductivity, azimuths and inverse distance field strengths, used as a basis for coverage contours and for the prohibitive contour overlap studies with other AM stations, are shown on the attached tables in Exhibit 15. The pertinent contours of other AM stations shown on the allocation maps have been obtained from their respective licensed or pending application files where indicated or computed, based on their standard radiation pattern and the Commission's estimated (Figure M-3) and/or measured conductivities.

NIGHTTIME ALLOCATION SITUATION

The proposed 2.5 kW nighttime directional operation of KGDP(AM) will not cause any predicted increase to the RSS nighttime limitation of other co or adjacent channel AM stations in accordance with engineering allocation standards prescribed in Section 73.182 of the Commission's Rules. The nighttime allocation data showing the proposed nighttime limitations are attached in Exhibit 16. The values of conductivity, azimuths and inverse distance field strengths which are used as a basis for coverage contours, are shown on the attached tables in Exhibit 15-A.

CONTOUR DATA

The distances to various field intensity contours were obtained by referencing the groundwave field strength versus distance graphs 4, 4A, 5 and 5A of Section 73.184 of the Commission's Rules. Where changes in estimated ground conductivity occur, the equivalent distance method of computation was used. The pertinent contours shown were computed based on the station's standard radiation pattern and the Commission's estimated (FCC Figure M-3) or measured conductivities, consistent with 73.24 and 73.183 of the FCC rules. Exhibits 12A and 12C show the computed 5 mV/m and nighttime interference-free contour (36.7 mV/m) respectively, of the proposed 2.5 kW operations in relation to KGDP's community of license, Oildale, CA. The proposed KGDP nighttime interference-free contour will provide service to all of Oildale and therefore is in compliance to the community coverage requirement.

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1 V/m CONTOUR

An air photograph and USGS map showing the KGDP antenna site are attached (see Exhibits 12-E and 12-F). The nature of the area surrounding the proposed KGDP transmitter site is rural, open land. There is no population (2000 US Census data) within the proposed 1 V/m daytime and nighttime contours. Consequently, the proposed operation of KGDP complies with Section 73.24 of the Rules.

MAIN STUDIO LOCATION

The main studio will be located within the predicted 5 mV/m daytime contour of KGDP(AM).

FAA DATA

Notification to the FAA was submitted and a determination of no hazard to air navigation was issued on April 4, 2004 in Aeronautical Study No. 2004-AWP-543-OE (see attached). To avoid unnecessary FAA and FCC paperwork it is respectively requested that the construction permit be granted conditionally with respect to tower registration. Once the antenna site has been surveyed for the final layout of the base piers for the towers including individual ground elevations, KGDP will seek FAA determination on all towers and also follow-up with the required antenna structure registration.

ENVIRONMENTAL STATEMENT

According to the applicant, the proposed site is not located near any known wilderness area, wildlife preserve or Indian religious site. The proposed AM facilities will not affect or jeopardize the continued existence of any threatened or endangered species or their critical habitats.

The proposed AM facilities are not located in a flood plain area.

Construction of radio towers and a building to house the transmitter and associated equipment at the site are proposed. After the construction, the area surrounding the site will be restored, as close as possible, to its original condition. Therefore, the construction of the proposed AM facility does not involve significant changes in the surface features of the site.

There is no proposal to equip the tower with high intensity white lights unless required by the FAA. However, the site is not located near any residential neighborhood.

An evaluation has also been made to determine compliance with the FCC specified standards for human exposure to RF radiation as set forth in the OST Bulletin No. 65 dated August 1997. According to Table 2 in Supplement A to OST Bulletin 65 (Edition 97-01), the Maximum Permissible Exposure (MPE) for specified electric and magnetic fields ("worst case") would not exceed more than 2 meters from the base of the tower for a transmitter power of 2.5 kW, assuming there is 2.5 kW power into each tower. The KGDP four tower 2.5 kW directional daytime operation has an approximate power distribution from 200 watts to 1.45 kW. Similarly, the KGDP four tower 2.5 kW directional nighttime operation has an approximate power

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distribution from 130 watts to 1.1 kW. Therefore, the distance of 2 meters overstates the minimum distance at which the aforementioned field levels may be exceeded for the four individual towers.

The KGDP(AM) transmitter site will be fenced around the perimeter of the property and around the base of each tower. The perimeter fencing and locked gate restrict access to the area by the general public. The security fencing and locked gate at the base of each tower prevents access to those areas. KGDP will also have appropriate warning signs describing the nature of the potential hazard. Additionally, Radio Representatives, Inc., (the applicant), will institute a program of assuring compliance with the Commission's guidelines concerning exposure to RF Fields. Upon grant of the KGDP proposal, further compliance will be accomplished, which could include conducting RF field measurements at the site. Access to any area found to exceed the Commission's guidelines for MPE near the towers will be restricted by installing additional fencing. Such a fence around the towers would effectively block and restrict access and unintentional use of the space near the towers.

With respect to work performed on the tower structures or inside the fenced area, the station will re-establish its written procedures including reducing or terminating the transmitter power to ensure that workers are not exposed to levels of RF Fields in excess of the Commission's guidelines.

The Commission guidelines for the AM band are the same (614 V/m Electric Field and 1.63 A/m Magnetic Field) for the occupational/controlled environment and for the general population/uncontrolled environment. For the reasons stated above, this proposal does not involve any action specified in Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.