KTWI Engineering Narrative

November 11, 2010

This application seeks relocation of KTWI to 190 meters above ground on a tower identified by registration number 1242828, to operate with 6,100 watts.

As this location and height results in a Height Above Average Terrain 102 meters greater than the reference 100 meters for a class C3 facility, the FCC "FM Power" tool was utilized to determine equivalent ERP.

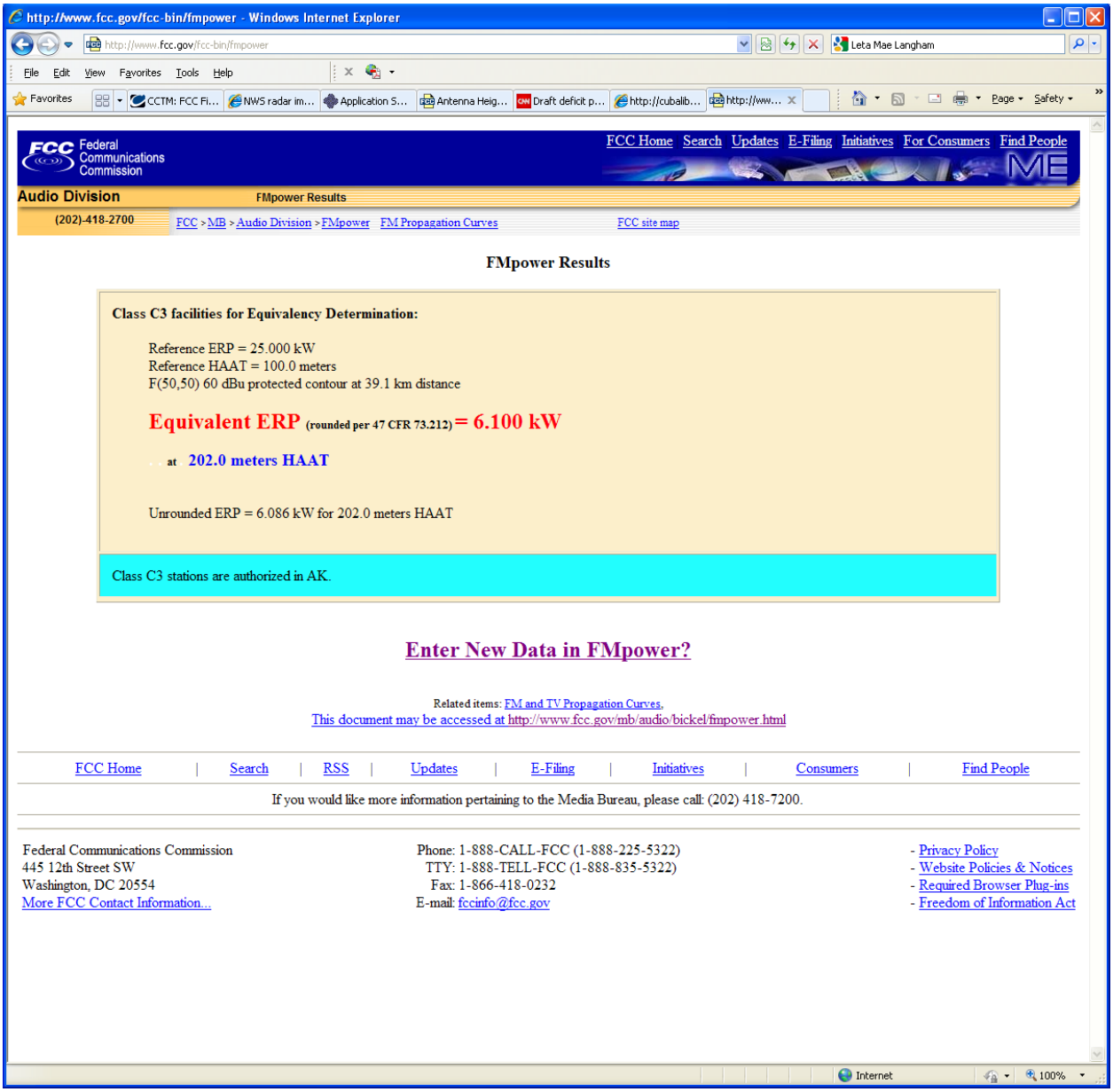
This location does not meet the spacing requirement of Section 73.207 with respect to station KKOT. Utilization of Section 73.215 is requested, a directional antenna is proposed to prevent prohibited contour overlap. A spacing study and contour study are presented below.

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

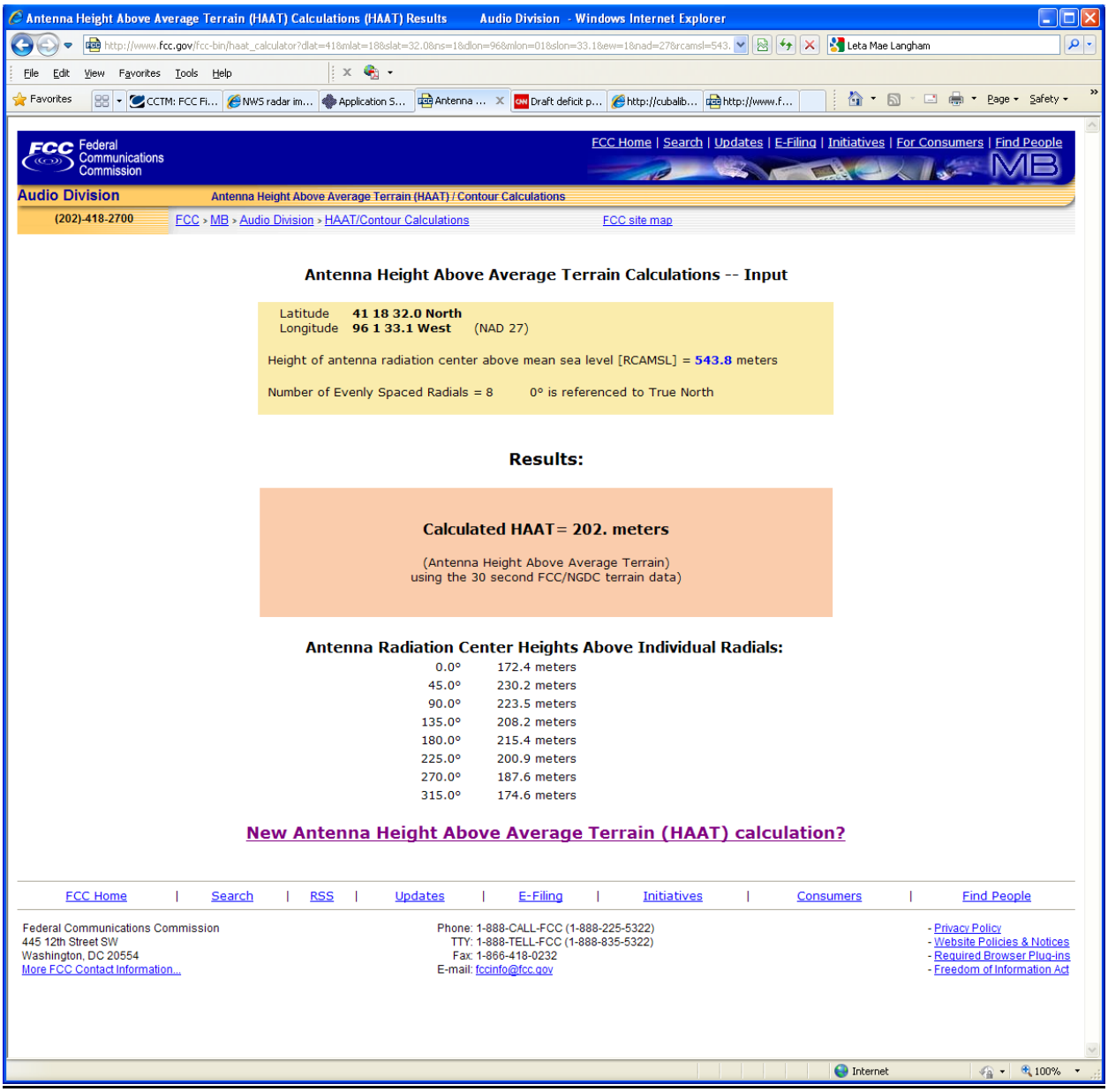
The proposed antenna system is unknown at this time. As a "worst case" study, a single bay, antenna mounted 190 meters above ground has been analyzed using the program " FM Model" set to calculate values for a "Ring Stub" antenna element operated with an effective radiated power of 6.1 Kilowatts in both the horizontal and vertical planes. At 2 meters above the surface, at 51 meters from the base of the tower, this proposal will contribute worst case, 6.94 microwatts per square centimeter, or 0.69 percent of the allowable ANSI limit for controlled exposure, and 3.45 percent of the allowable limit for uncontrolled exposure. This figure is less than 5% of the applicable FCC exposure limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be less than 5% of the applicable exposure limit. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

FM Power Results



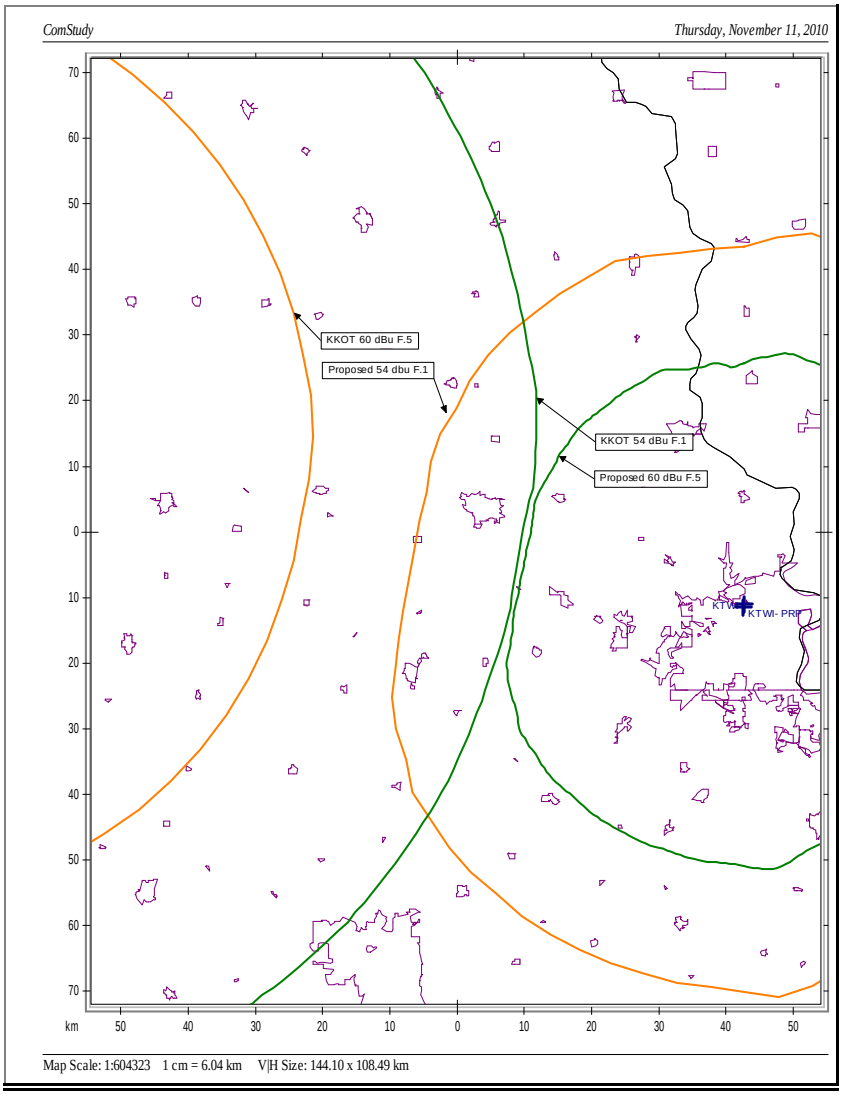
Calculation of Antenna Height Above Average Terrain Calculations



Spacing Study

Callsign	State	City	Freq	Chanl	ERP_w	Class	Status	Dist_km	Sep	Clr
KTWI	NE	BENNINGTON	93.3	227	9600	C3	LIC	0.53	153	-152.5
KKOT	NE	COLUMBUS	93.5	228	100000	C1	LIC	140.59	144	-3.4
KIOA	IA	DES MOINES	93.3	227	82000	C1	LIC	217.55	211	6.6
KRSS	MO	TARKIO	93.5	228	11000	C3	LIC	112.73	99	13.7

Contour Map



FM Model Results