

TECHNICAL NARRATIVE

This Technical Statement and attached exhibits were prepared on behalf of Riverfront Broadcasting, LLC (Riverfront). Riverfront is the permittee of construction permit BNPH-20120529AEW for Channel 283C0 at Murdo, South Dakota (Facility ID No. 190370). Riverfront is filing an FCC Form 301 construction permit modification to specify operation on Channel 283C1 with service to Blunt, South Dakota. The proposal is described in its entirety for the convenience of the FCC staff but the actual requests are made by the application itself.

The proposed Channel 237C1 application and hypothetical/reference site, located at 44° 18' 42" North Latitude 100° 21' 10" West Longitude (NAD 27), is mutually exclusive with the current Channel 283C0 construction permit. The existing tower is associated with Antenna Structure Registration (ASR) No. 1042183. This modification is also compliant with all the requirements of 47CFR §73.207 and 47CFR §73.315. The proposed Channel 283C1 facility will operate with 100 kW @ 154 meters HAAT.

Riverfront is proposing to implement this change at an existing tower and will require the modification of the existing tower by increasing the overall height to 152.1 meters above ground. The Federal Aviation Administration (FAA) issued Aeronautical Study No. 2013-AGL-3766-OE on April 30, 2013 made a "Determination of No Hazard To Air Navigation". A complete description of SHPO/THPO Section 106 compliance can be found in the Environmental Exhibit titled "Compliance with RFR Exposure Levels and Section 106. The reference and application site Channel Study for Blunt, SD Channel

283C1 is fully spaced to all full power FM facilities. The proposed application site is short spaced to low power FM station (LPFM) KPGN-LP Channel 284L1, Facility ID No. 132351, licensed to Pierre, SD. Riverfront is not responsible for expenses associated with the relocation of KPGN-LP to a new channel. However, a channel study from the KPGN-LP licensed site indicates a minimum of 44 alternate channels are available including 3rd adjacent channel 287L1. Therefore, it should not be difficult for KPGN-LP to relocate to a new frequency and remain operating.

Both the reference site hypothetical 70 dBu community contour and the application site FCC F(50,50) 70 dBu city grade contour both cover 100% of the Blunt, SD corporate boundaries. The proposed Channel 283C1 facility would serve within the FCC F(50,50) 60 dBu protected contour an area of 11,063.1 sq. km. and 22,836 persons (2010 U.S Census).