

**AMEND BMPH-20070523ADS**  
**CHANGE COMMUNITY OF LICENSE**  
**AIREN BROADCASTING COMPANY**  
**KZCC (FM) RADIO STATION**  
**CH 238C3 - 95.5 MHZ - 5.0 KW**  
**TRINIDAD, CALIFORNIA**  
**June 2007**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Airen Broadcasting Company ("ABC"), permittee of station KZCC, Channel 238C3, McCloud, California. ABC submitted a modification of construction permit application proposing a change in community of license for KZCC. The proposed change necessitated an involuntary channel change at McKinleyville, California. ABC proposed that Channel 249C3 be substituted for Channel 236C3 at McKinleyville. Unbeknownst to ABC, the Auction 70 winner at Willow Creek, California sought to upgrade its facility, which required the substitution of Channel 249C1 for Channel 256C1 at Ferndale, California. There is a conflict between the use of Channel 249 at both McKinleyville and Ferndale.

While the Willow Creek application was entered into the Commission's CDBS database in a matter of days after filing, the requested change at Ferndale was not entered into the database until weeks later and, therefore, ABC had no knowledge of the conflicting use of Channel 249. ABC herein provides an alternate channel for its requested channel change at McKinleyville, which will have no impact to the Willow Creek/Ferndale proposals. It will, however, necessitate a second involuntary change to make the alternate channel for McKinleyville viable. Aside from

the channel change proposals, no other changes to the modification application are proposed. All previously prepared exhibits are being resubmitted herein for the staff's convenience.

Attached as Exhibit A is a demonstration that the proposed Channel 238C3 allotment to Trinidad, California complies with the allocation criteria and §73.207 of the Commission's rules, provided that Channel 299C3 is substituted for Channel 236C3 at McKinleyville, California. ABC herein requests an Order to Show Cause directed to William W. McCutchen, III, to state why his new facility at McKinleyville, California should not operate on Channel 299C3 in lieu of Channel 236C3. Further ABC requests that Channel 273C2 be substituted for Channel 297C2 at Rio Dell, California, and that station KNHT be ordered to change channels. ABC herein requests the FCC issue an Order to Show Cause to the licensee of KNHT as why this change should not be made. The channels requested at McKinleyville and Rio Dell can be implemented at the application site at McKinleyville and the KNHT licensed site at Rio Dell.

ABC is proposing to implement this change at a new tower site. As the proposed antenna structure, a telephone pole, is less than 200 feet, the Federal Aviation Administration was not apprised of this proposal. Further, the pole on which the KZCC antenna is to be located does not require tower registration.<sup>1</sup> Due to the location of the KZCC antenna on a relatively short mounting structure, the worksheets associated with FCC Form 301 could not be used to show compliance with the Commission's radio frequency radiation exposure limits. Therefore, attached as Exhibit B is a study showing that this proposal is in compliance with the RF limits.<sup>2</sup>

- 
- 1) The pole height and site elevation were reviewed using the Commission's TOWAIR program.
  - 2) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All other reviews, where necessary, have been or will be addressed by the applicant.

Exhibit C is all the required technical material demonstrating the proposed city of license change is a preferable assignment. As ABC has no interest in any other radio stations in or near the proposed community of Trinidad, California, this proposal complies with the Commission's ownership rules.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to ABC and is available to the Commission upon request.