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ENGINEERING STATEMENT

**HARBIT COMMUNICATIONS, INC.
KNMO, NEVADA, MISSOURI**

**MODIFICATION OF PENDING APPLICATION
File # BPH-20020329ADJ**

**Change in Location(minor)
Decrease HAAT**

6/14/02

INTRODUCTION

This application serves to modify an application which is pending on behalf of the applicant, Harbit Communications, Inc. for station KNMO-FM Nevada, Mo. (BPH-20020329ADJ) Specifically this application modifies the co-ordinates of the proposed antenna/transmitter location based on a certified survey recently completed and seeks a reduction in facility HAAT.

The changes applied for herein are to comply with MM Docket 00-129 which requires changes to the KNMO facility.

CHANGE IN LOCATION

Subsequent to the original filing for construction permit, a Missouri State Certified surveyor was engaged for the purpose of locating the exact position of the tower and anchor positions. The tower base was relocated very slightly to better fit the structure on to the property and the certified co-ordinates of that location are used for the purpose of this modification.

CHANGE IN HAAT

All suitable locations for the modified facility of KNMO which are fully spaced for the purposes of 47CFR 73.207 are within the approach corridor to Nevada Municipal Airport. For that reason, the height of the supporting structure proposed in the filing for construction permit is of too great a height for the FAA to grant its construction. After discussions with the FAA Central Regional Airspace Branch, a tower height AGL of 255 feet was agreed to and a finding of no hazard has been issued. Reference Aeronautical Study # 2002-ACE-540-OE which authorizes the structure of the height requested in this application. Other locations were investigated, but presented similar problems for airspace clearance and were rejected in favor of the original location proposed with the attendant reduction of tower height.

An application for Antenna Structure Registration is being filed concurrently with this application.

RESULTS OF CHANGES

There is a small reduction in the area of coverage of the 70dBu contour of the proposed facility due to the reduction in antenna HAAT. The 70dBu contour proposed herein is still more than adequate for coverage of the city of license. The very small change due to correction of tower co-ordinates (less than 20 M) does not materially affect the spacing of the facility nor coverage and should be disregarded other than its status as the most accurate location of the facility available.

The proposed antenna is to be located at 73.7 M above ground level with an ERP in the Horizontal and Vertical radiation plane of 6 KW. Power density at 2 M above ground is calculated at 0.077 mw/cm^2 . This is well below the allowable limit for both general and occupational exposure. Therefore, the change in antenna height has not created any hazard due to non-ionizing radiation concerns. Agreements are in effect to see that transmitter power is sufficiently reduced on the part of the applicant's facility and all others that may, in the future, have facilities co-located, for the protection of workers on or near the tower.

All other environmental concerns were addressed in the original application for CP and remain un-altered. All other items addressed in the original application for Modification referenced above with the exception of those modified by this application remain correct and are not modified or included herein.

EXHIBITS SUBMITTED WITH THIS APPLICATION

The following exhibits have been prepared for this application and are submitted as part of this Engineering statement and attachments to the application.

- Exhibit E-1 Spacing Study using Certified Co-ordinates
- Exhibit E-2 Calculation of Contours at modified Height
- Exhibit E-3 Digitally Generated map showing 70dBu and 60dBu contours
Of proposal and city of license coverage
- Exhibit E-4 Sketch of support structure

Since no change in location due to the more accurate co-ordinates would be discernable on the topographic map showing the transmitter location originally submitted, it is not duplicated herein.

CONCLUSION

The data submitted with this application show these changes to the original proposals in BPH 20020329ADJ will not cause objectional interference nor environmental impact and will comply with all current Commission Rules and Regulations should they be approved. By grant of this request, the applicant can proceed swiftly to comply with the requirements of MM Docket 00-129. Such grant would not constitute a major action as defined by the Commission's Rules.

CERTIFICATION

The undersigned has been retained as a Technical Consultant by the applicant for the purpose of preparation of this application. The application was prepared by the undersigned using the most current information available at the time of preparation. All statements are believed to be true and correct to the best knowledge of the undersigned consultant. The undersigned had submitted numerous filings which were found acceptable by the Commission and his qualifications are a matter of record. Inquiries by Commission staff which will facilitate their processing of the information contained herein are welcomed.

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