EXHIBIT 11 – WAIVER REQUESTS

WAIVER OF 73.870 REQUESTED

THE APPLICANT IS REQUESTING WAIVER OF SECTION 73.870 OF THE COMMISSION'S RULES WITH REGARD TO THE PROPOSED ANTENNA RELOCATION.

THE PROPOSED MOVE WILL BE 6.76 KILOMETERS, WHICH IS GREATER THAN THE 5.6 KILOMETERS PERMITTED UNDER THE COMMISSION'S RULES. APPLICANT IS LOSING USE OF ITS CURRENT SITE, A NEW SITE COULD NOT BE FOUND WITHIN THE REQUIRED DISTANCE, AND A WAIVER OF SECTION 73.870 OF THE COMMISSION'S RULES IS REQUESTED TO ALLOW THIS FACILITY TO CONTINUE TO PROVIDE ITS SERVICE TO THE PUBLIC. THE COMMISSION HAS FOUND IT APPROPRIATE TO APPROVE SUCH WAIVERS IN OTHER CASES UNDER SIMILAR CIRCUMSTANCES.[1]

WAIVER OF 73.807 REQUESTED

The proposed application meets all spacing requirements relative to nearby co-channel, and 1st and 2nd adjacent channels, with the exception of KIFS, Ashland, OR.

The proposed transmitter site for KJCR-LP is short-spaced by 0.6 km (FCC rounded) with 2nd adjacent station KIFS, Ashland, OR (see Figure 1), therefore, the Applicant requests waiver relative to 2nd adjacent station KIFS using the desired to undesired signal ratio methodology.

The FCC predicted field strength of KIFS at the proposed site is 66.4 dBu. The corresponding interfering contour is therefore 106.4 dBu (utilizing the 40 dBu

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[1] For example, see BPL-20131025AAA, FCC ID# 135324, KVFS-LP, granted 1/10/2014; BPL-20130805AAA, FCC ID# 132224, WPHF-LP, granted 8/20/2013; and BPL-20120926ASY, FCC ID# 133357, WPVM-LP, granted 2/19/13.

KJCR-LP Modification
Wtl Communications, Inc.

REFERENCE						DISPLAY DATES
42 24 13.2 N.			CLASS = L1			DATA 03-22-14
123 21 40.7 W.			Current Spacings to 2nd Adj.			SEARCH 03-22-14

Channel 300 - 107.9 MHz

Call		Channel	Location		Azi	Dist	FCC	Margin
KJCR-LP	APP	300L1	Grants Pass	OR	0.0	0.00	23.5	-23.5
KJCR-LP	APP	300L1	Grants Pass	OR	0.0	0.00	23.5	-23.5
KJCR-LP	LIC	300L1	Grants Pass	OR	346.9	6.76	23.5	-16.7
KIFS	LIC-N	298C2	Ashland	OR	102.9	51.86	52.5	-0.6
DKBCC-LP	LIC	300L1	Cave Junction	OR	209.9	35.74	23.5	12.2
K300BE	LIC-D	300D	Ashland	OR	110.8	54.39	25.5	28.9
NEW	CP	300L1	Riddle	OR	359.2	58.90	23.5	35.4
KUMP-LP	LIC	300L1	Days Creek	OR	24.4	64.47	23.5	41.0
650069	APP	299D	Glide	OR	12.7	90.23	27.5	62.7
650119	APP	299D	Roseburg	OR	358.9	88.72	20.5	68.2
KBDF	LIC-N	299A	Diamond Lake	OR	48.7	132.22	55.5	76.7
650008	APP	299D	Elkton/days Creek	OR	355.3	111.62	20.5	91.1
KKLC	LIC-N	300C1	Fall River Mills	CA	142.1	209.65	110.5	99.2

All separation margins include rounding

Figure 1

undesirable to desirable ratio). An omnidirectional 0.100 kW signal would produce a 106.4 dBu F(50,10) interfering contour extending 335.8 meters from the antenna. This would encompass nearby structures.

In order to eliminate any interference to 2nd adjacent KIFS, a directional antenna is proposed. This antenna will comply with requirements of 73.816(c)(2) which states the following:

> *LPFM permittees and licensees proposing a waiver of the second-adjacent requirements of paragraph 73.807 may utilize directional antennas for the sole purpose of justifying such a waiver.*

A directional antenna will be used solely for the purpose of providing interference protection to a second-adjacent channel at a nearby residence.[2] The applicant proposes to utilize a single off-the-shelf Kathrein-Scala CA5-FM/CP directional antenna (see Figure 2), mounted with a rotation of 54 degrees true in order to eliminate any possible interference to an adjacent structure. This antenna will radiate 0.100 kW in the horizontal plane and 0.100 kW in the vertical plane.

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[2] See FCC grant of similar request for KUOL-LP, FID # 196131, granted 02/24/2014.

KJCR-LP

03-21-2014 RMS(V)= .432

Graph is Relative Field

Azi	Field	dBk	kW
000	0.247	-22.157	0.006
010	0.423	-17.467	0.018
020	0.628	-14.037	0.039
030	0.796	-11.982	0.063
040	0.915	-10.774	0.084
050	0.978	-10.194	0.096
060	0.975	-10.220	0.095
070	0.915	-10.774	0.084
080	0.796	-11.982	0.063
090	0.628	-14.037	0.039
100	0.423	-17.467	0.018
110	0.247	-22.157	0.006
120	0.142	-26.973	0.002
130	0.135	-27.393	0.002
140	0.150	-26.478	0.002
150	0.170	-25.391	0.003
160	0.189	-24.485	0.004
170	0.183	-24.765	0.003
180	0.155	-26.193	0.002
190	0.123	-28.181	0.002
200	0.127	-27.944	0.002
210	0.145	-26.773	0.002
220	0.170	-25.391	0.003
230	0.188	-24.503	0.004
240	0.188	-24.503	0.004
250	0.170	-25.391	0.003
260	0.145	-26.773	0.002
270	0.127	-27.944	0.002
280	0.123	-28.181	0.002
290	0.155	-26.193	0.002
300	0.183	-24.765	0.003
310	0.189	-24.485	0.004
320	0.170	-25.391	0.003
330	0.150	-26.478	0.002
340	0.135	-27.393	0.002
350	0.142	-26.973	0.002

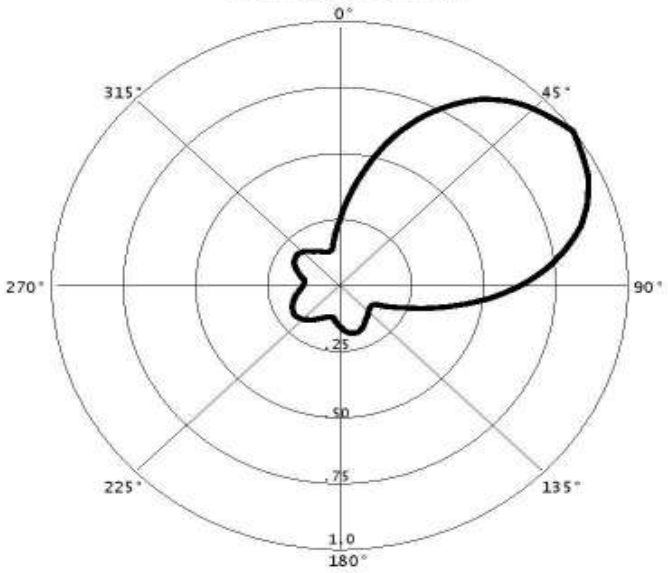


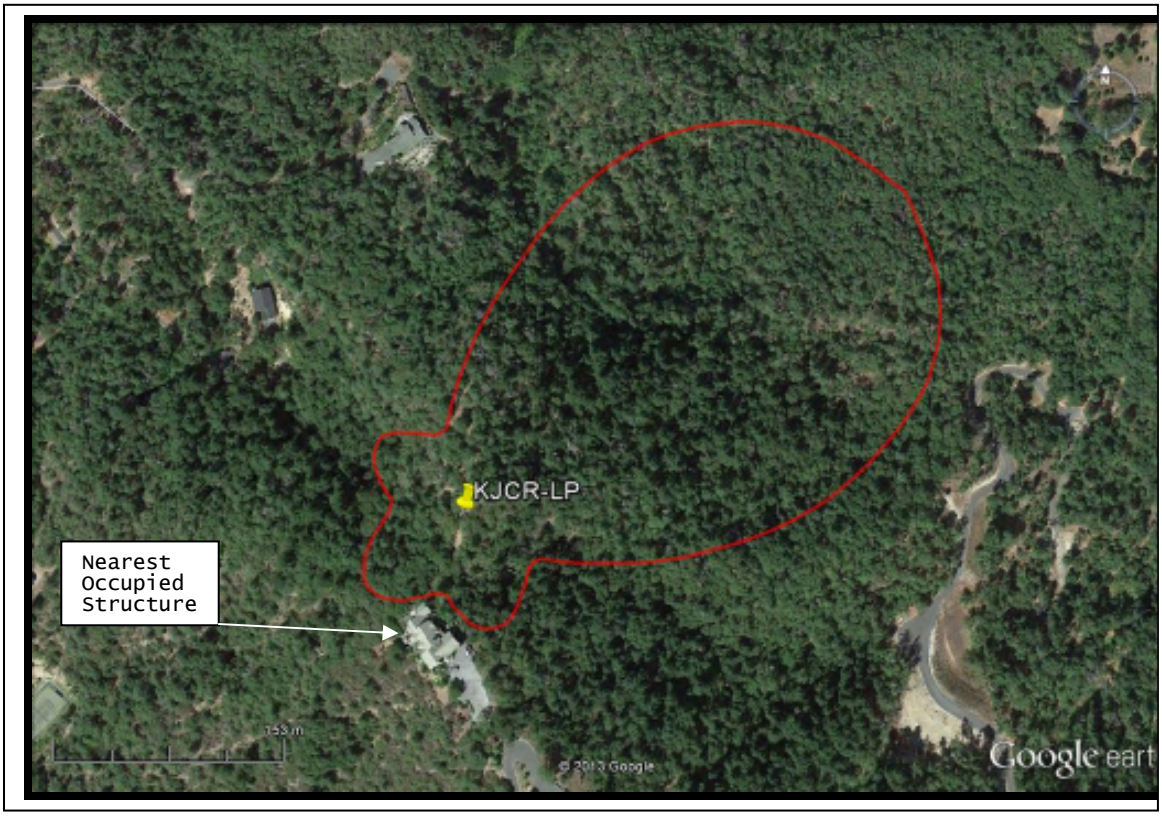
Figure 2

The respective distances and effective radiated power levels to the 106.4 dBu interfering contour are noted in Table 1 (free space method used). The azimuth noted in the table includes the 54 degree rotation.

Azimuth (degrees)	Relative Field	Power(kW)	106.4 Dist (m)F(50,10)		Azimuth (degrees)	Relative Field	Power(kW)	106.4 Dist (m)F(50,10)
0	0.247	0.006	82		180	0.155	0.002	47
10	0.423	0.018	142		190	0.123	0.002	47
20	0.628	0.039	210		200	0.127	0.002	47
30	0.796	0.063	266		210	0.145	0.002	47
40	0.915	0.084	308		220	0.17	0.003	58
50	0.978	0.096	329		230	0.188	0.004	67
60	0.975	0.095	327		240	0.188	0.004	67
70	0.915	0.084	308		250	0.17	0.003	58
80	0.796	0.063	266		260	0.145	0.002	47
90	0.628	0.039	210		270	0.127	0.002	47
100	0.423	0.018	142		280	0.123	0.002	47
110	0.247	0.006	82		290	0.155	0.002	47
120	0.142	0.002	47		300	0.183	0.003	58
130	0.135	0.002	47		310	0.189	0.004	67
140	0.15	0.002	47		320	0.17	0.003	58
150	0.17	0.003	58		330	0.15	0.002	47
160	0.189	0.004	67		340	0.135	0.002	47
170	0.183	0.003	58		350	0.142	0.002	47

Table 1 – Distance to the 106.4 dBu F(50,10) interfering contour

The interfering contour is shown overlaid on an aerial view of the surrounding terrain in Figure 3 below. The closest occupied structure is a residence on a bearing of 204 degrees, at which, the distance from the structure to the antenna is 49 meters. As can be seen from Table 1, the distance to the interfering contour in the range of 180 – 210 degrees is 47 meters and therefore does not intersect the closest part of this nearby structure. As can also be observed from Figure 3, there are no other structures within reach of the interfering contour. (Because this map does not take into account the height of the transmitting antenna or the elevation pattern of the antenna, it displays a worst-case interference scenario.)



106.4 dBu F(50,10) Interfering Contour
Figure 3

Since there is no population within the interfering contour, the Applicant respectfully submits that this application qualifies for a waiver with respect to KIFS, Ashland, OR as provided for in 73.807(e)(1) of the Commission's Rules.

FM TRANSLATOR/BOOSTER INTERFERENCE

Table 2 details all FM translators/boosters located within a 10 km radius of the proposed transmitter site for KJCR-LP. KJCR-LP does not occupy a third adjacent channel relative to any of the off-air inputs to any of the translators, and therefore complies with 47 C.F.R. Section 73.827(a).

GRANTS PASS, OR FM TRANSLATORS WITHIN 10 KM OF PROPOSED CHANNEL 300

FCC ID	DISTANCE (km)	Translator INPUT	Primary CHANNEL
K201DI	7.54	KDOV(FM)	219
K217BZ	6.64	KSMF(FM)	206
K225AC	8.87	KIFS(FM)	298
K241AB	6.64	KTMT-FM	229
K254BS	6.59	KRWQ(FM)	262
K268BZ	8.9	KSOR(FM)	211
K284AF	6.64	KTMT-FM	229
K288CP	8.87	KRWQ(FM)	262

Table 2

(NOTE: KJCR-LP is 2nd adjacent to the primary input of FM Translator K225AC (channel 298), however, as demonstrated in **Figure 8** below, KJCR is not located within the FCC defined capture zone of the translator.)

Figure 8