

EXHIBIT 15

Contour Overlap Requirements

The allocation tabulation for the proposed station is reported on the following pages. A complete explanation of how to read the printout is shown on the page after that. Summarizing the explanation, each pair of lines represents an existing or proposed full service station. Entries which have a negative number in the columns marked **IN** or **OUT** could cause interference with the proposed station. At the bottom of the report the distance to the nearest TV-6 station is reported. For clarity, the groups are discussed in the order they first appear on the tabulation.

Noncommercial Educational Stations and Applications

All the stations/applications listed are clear of prohibited contour overlap on the straight line connecting them to the proposed station, since both the **IN** and **OUT** entries are positive in all cases except, of course, the entry reflecting the station being modified. Maps are provided for each entry where the straight line clearance was less than 20 km to certify the clearance extends to all azimuths. The first application, after the entry of the station being modified on the printout is KTCV.A Kennewick 201A, which is shown to be clear of both incoming and outgoing overlap in the map. Contours of KETP and the NEW McCall 202C will also be provided. Visual inspection clearly shows there is no prohibited contour overlap; no FMOVER proofs are needed. Maps are sufficient to certify the clearance of all the other entries.

IF (53 or 54 channel spacing) relationships

FM CONT shows KUBQ, La Grande as being 36.27 km and distance is 31 km. There are no IF problems.

TV channel 6

KIVI-TV is no longer operating on an analog TV 6 signal, but is examined in Exhibit 19 for compliance.

Class Contour Distance

The maximum proposed ERP is 4.65 kW, the 8 radial HAAT is 551.3 meters and the class contour distance in kilometers is 57.58 km, which after rounding is 58 km. According to §73.211(b)(1), this is a Class C1 class filing.

This allocation study shows that no interference to existing or proposed FM stations will be produced by the proposed application. The Commission may properly grant a construction permit.