

Exhibit 11 (8 pages)

LANCASTER EDUCATIONAL BROADCAST SERVICE

Minor Modification for LPFM, KLQS-LP, Facility 195731

BNPL - 20131114BXI

KLQS-LP, permittee of a new LPFM station for the area of Lancaster, California, respectfully requests a minor modification to allow the station to be licensed by the expiration of the Construction Permit on 02/06/2017. Since being permitted, unexpected problems have arisen regarding channel displacement and transmitter site availability that necessitates the permittee to request modifications in order to license a viable facility.

Since being permitted, the facility has been short spaced to a new full-power construction permit for station KHHT as illustrated below in Figure 1. Additionally, K256BS was granted a new Construction Permit moving their community of license from North Edwards to Palmdale. The conflict has not only produced a short-spacing issue, but also both K256BS and KLQS-LP are permitted to serve the Lancaster-Palmdale community on the same channel, namely channel 256. Therefore the two facilities will interfere with each other with the more powerful K256BS dominating since it is located closer to Lancaster while KLQS-LP is distanced roughly 14 miles from central Lancaster. Moreover, KLQS-LP is limited to 2 watts ERP due to higher elevation. See Figure 1 below.

As a consequence, a displacement channel is requested per Section 73.870(a)(1) which allows such modifications if licensee/permittee can demonstrate reduced interference on any other open channel.

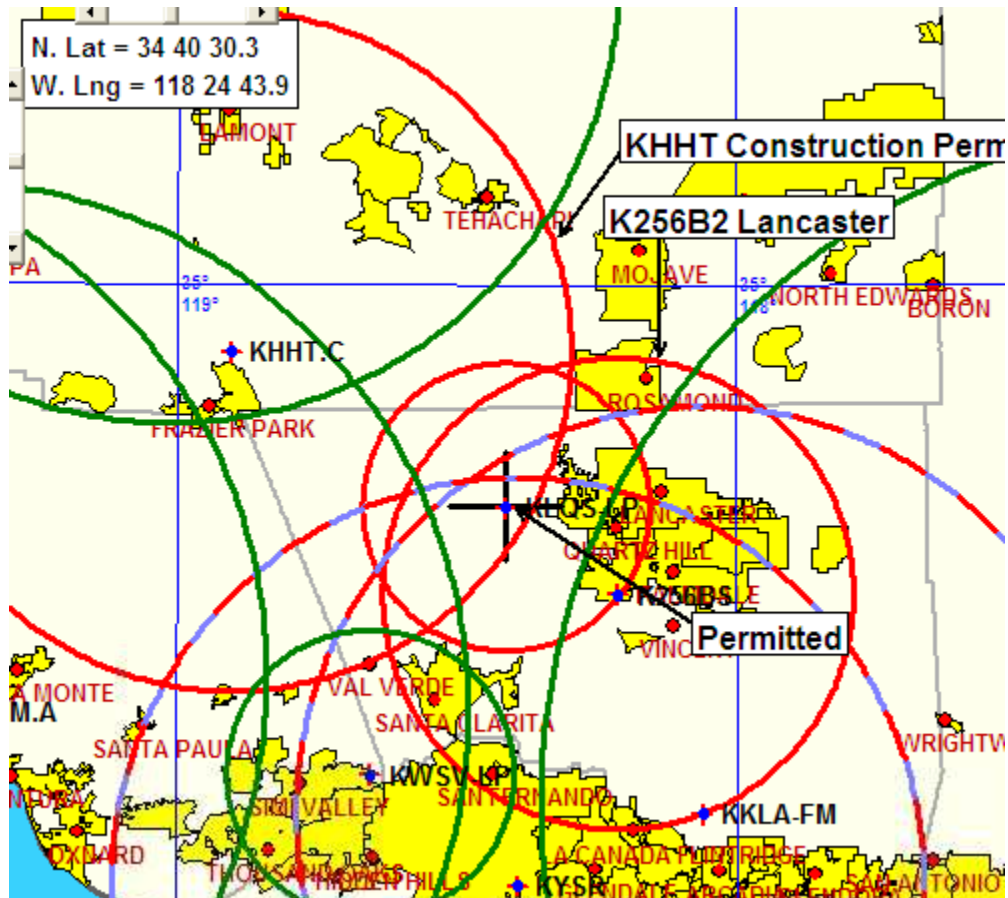


Figure 1: Current KLOS-LP CP: Spacing to KHHT and K256BS

Figure 2 represents the co-channel interference with 2-watt KLOS-LP which is unable to service the population within the greater Lancaster area from the current site. (The stations are within 15 km of each other.)

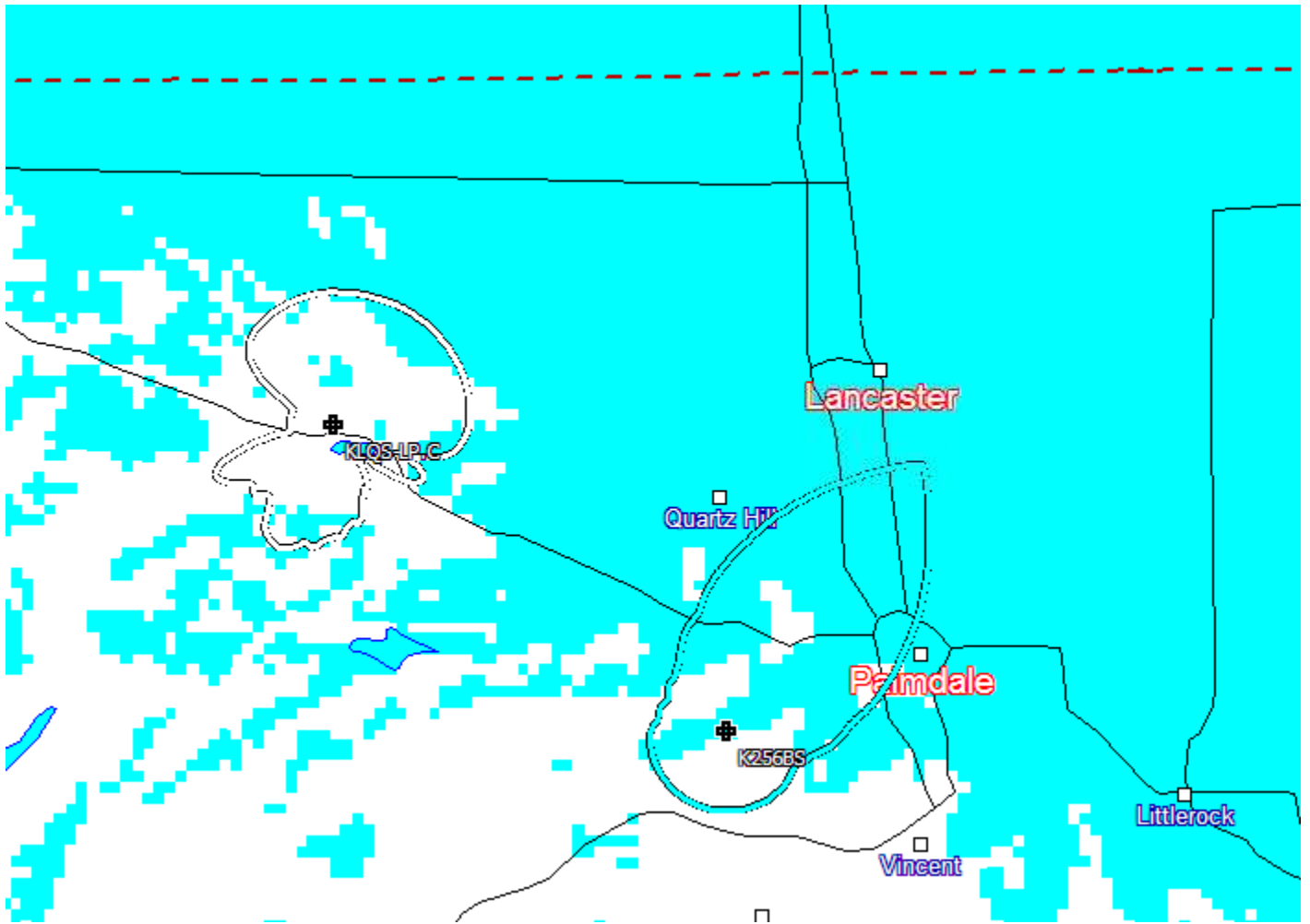


Figure 2: Interference from K256BS on co-channel to KLOS-LP in the Lancaster, CA area.

At the current location, there is no suitable channel available that allows for substantial population coverage.

The problems the KLOS-LP permittee has at the current proposed site are as follows:

- (A) Suitable power is not available to run the facility at the chosen site.
- (B) The area is mountainous necessitating the transmitter be placed on a mountain top. The available mountain-top sites are either too high in terms of HAAT to facilitate a LPFM facility, or only allow 1 to 2 watts ERP, which cannot overcome the incoming interference of the crowded Los Angeles County FM band. Figure 3 below shows the areas in which these peaks reside within the yellow circle.
- (C) At the current location, KLOS-LP is unable to service the population within the greater Lancaster area as intended. The remaining service area is very sparsely populated.
- (D) The Los Angeles National Forest (shown in Green in Figure 3) encompasses other possible transmitter sites where it is difficult or impossible to obtain permission for new construction.

Therefore, the permittee proposes moving to the nearest viable location beyond the National Forest which is approximately 12.7 miles to the south (See Figure 3 below).

In a similar case, a LPFM permittee in Castaic, CA, **BMPL-20140623AAG**, was granted a waiver to move a substantial distance across the Los Angeles National Forest to the nearest location offering a viable site.

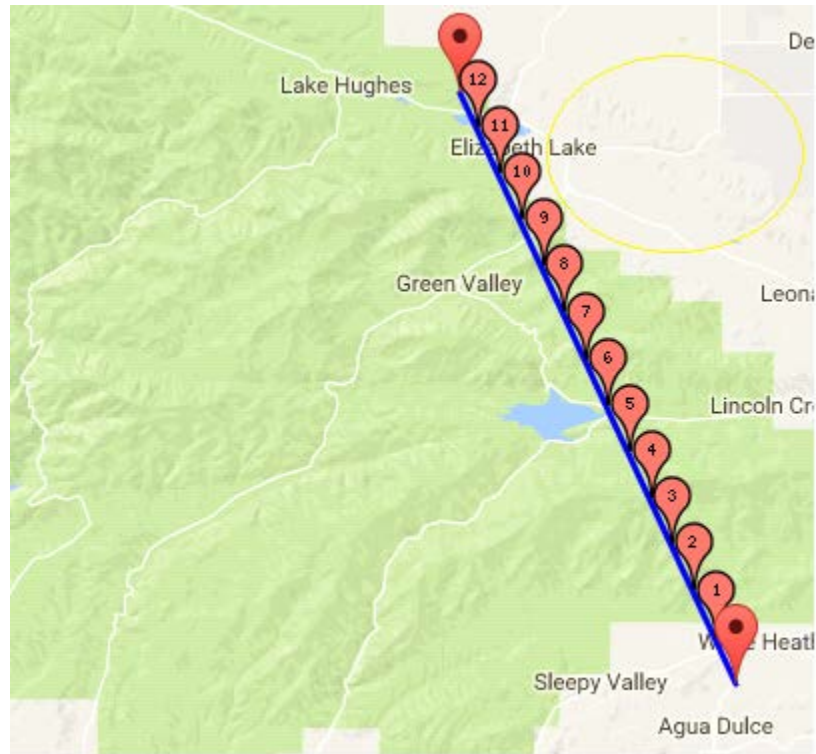


Figure 3: Relocation vector, across National Forest land.

It is worth noting, the previous site and the newly proposed site are approximately equidistant to Lancaster.

Waiver Request

Permittee respectfully requests a waiver to move a distance greater than 5.6 km due to the very limited amount of relocation sites within the mountainous Los Angeles National Forest.

Channel Displacement Request

Permittee respectfully requests channel relocation to channel 244 where there is less interference.

The proposed site lies 91.3 km away from co-channel KWIZ Santa Ana at the edge of its 40 dBu contour behind a high mountain range, and 69 km away from co-channel KLJR-FM (280 watts ERP) Santa Paula near the edge of its 40 dBu contour. The proposed channel is expected to have considerably less incoming interference. Refer to Figure 4.

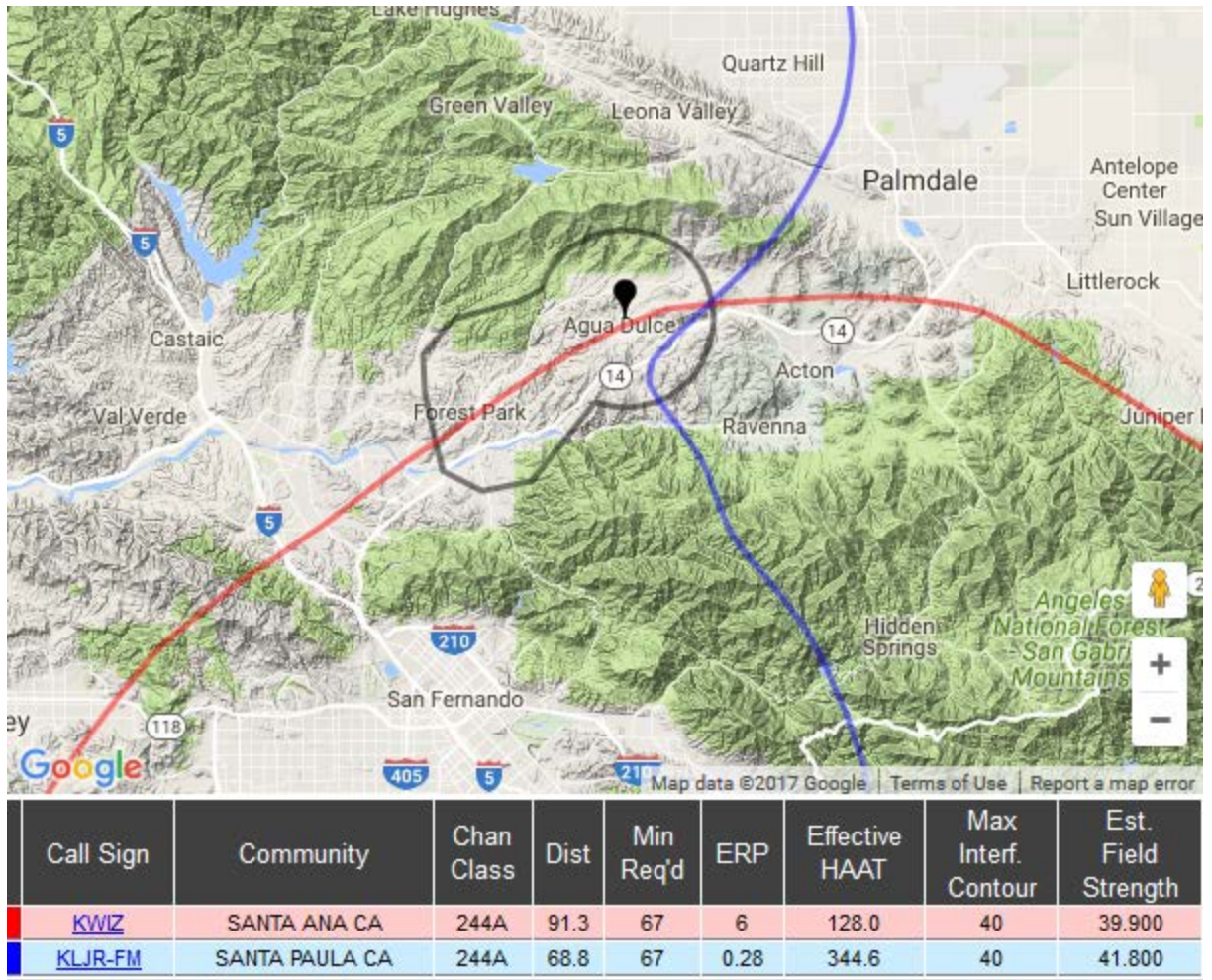


Figure 4: Estimated co-channel interference contours from KWIZ and KLJR-FM relative to Proposed.

Coordinates/Elevation/Channel

Nad83 Lat: 34 30 30.0 N Long: 118 19 7.1 W
 Nad27 Lat: 34 30 30.0 N Long: 118 19 03.8 W
 Elevation 799.2 m (Ground) + 10 m = 809.2 m
 Channel 244

Spacing

Lancaster Educational Broadcast Service

REFERENCE

34 30 30.0 N.
118 19 03.8 W.

CLASS = L1 Int = L1
Current Spacing to 2nd Adj.

DISPLAY DATES

DATA 04-08-16
SEARCH 01-20-17

----- Channel 244 - 96.7 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin

* KXOL-FM	LIC-Z 242B	Los Angeles	CA	171.0	35.00	66.5 -31.5
* KAMP-FM	LIC-D 246B	Los Angeles	CA	143.5	38.85	66.5 -27.7
KLJR-FM	LIC 244A	Santa Paula	CA	253.1	69.27	66.5 2.8
K242CR	CP -D 242D	Palmdale	CA	79.6	16.92	13.5 3.4
NEW	CP 244L1	North Hollywood	CA	180.4	32.66	23.5 9.2
KFXM-LP	LIC 244L1	Lancaster	CA	20.8	37.89	23.5 14.4
KPSL-FM	LIC 243B	Bakersfield	CA	334.6	120.28	96.5 23.8
KWIZ	LIC-D 244A	Santa Ana	CA	148.4	91.95	66.5 25.5
KCAL-FM	LIC 244A	Redlands	CA	109.8	100.98	66.5 34.5

Reference station has protected zone issue: Mexico
All separation margins include rounding

* Waiver Request, Second Adjacent

Spacing Map

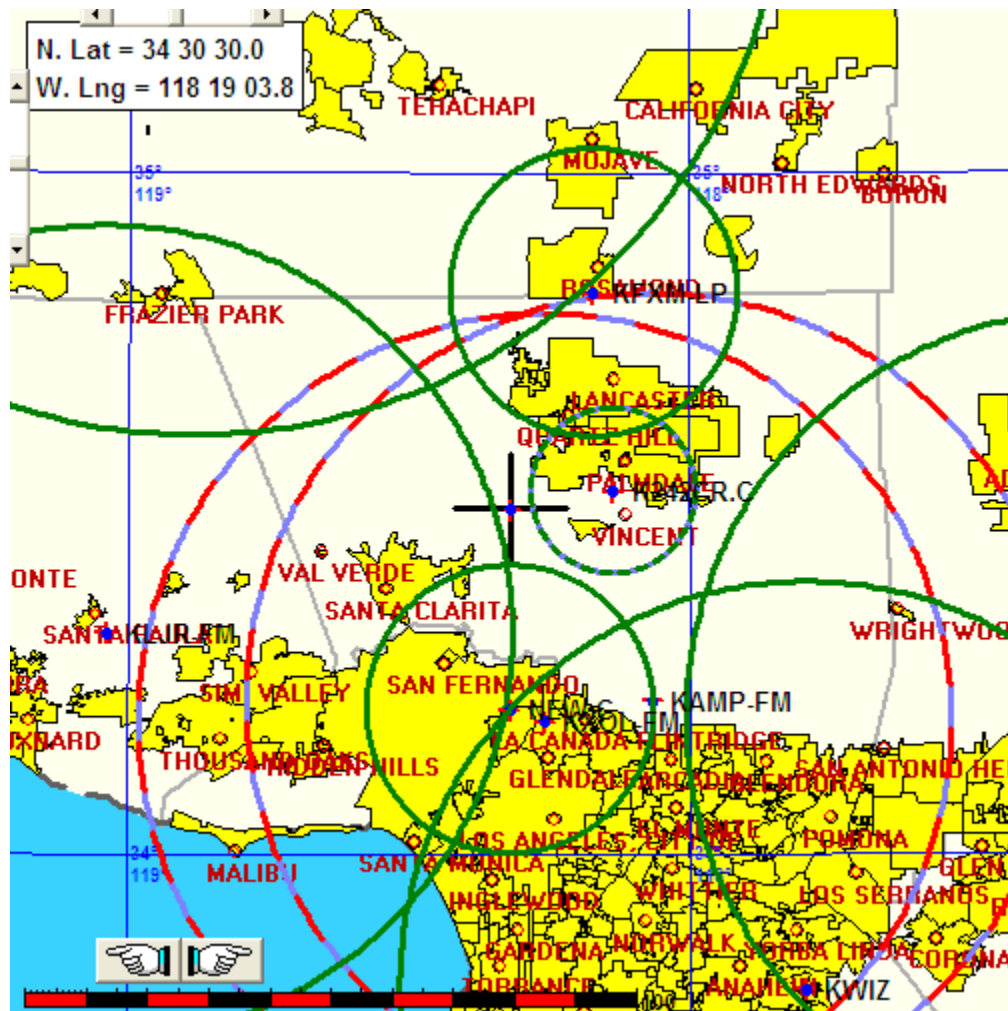


Figure 5.

Second Adjacent Waiver Request: Proposed resides short-spaced to second adjacent channels KXOL and KAMP. U/D analysis was undertaken; it was found that Proposed lies outside of the 54 dBu protected contours of KXOL and KAMP (and the 60 dBu of K242CR), providing no interference within all three protected contours. See Figure 6 below. The proposed thus passes waiver request muster for zero population interference overlaps for all second adjacent facilities.

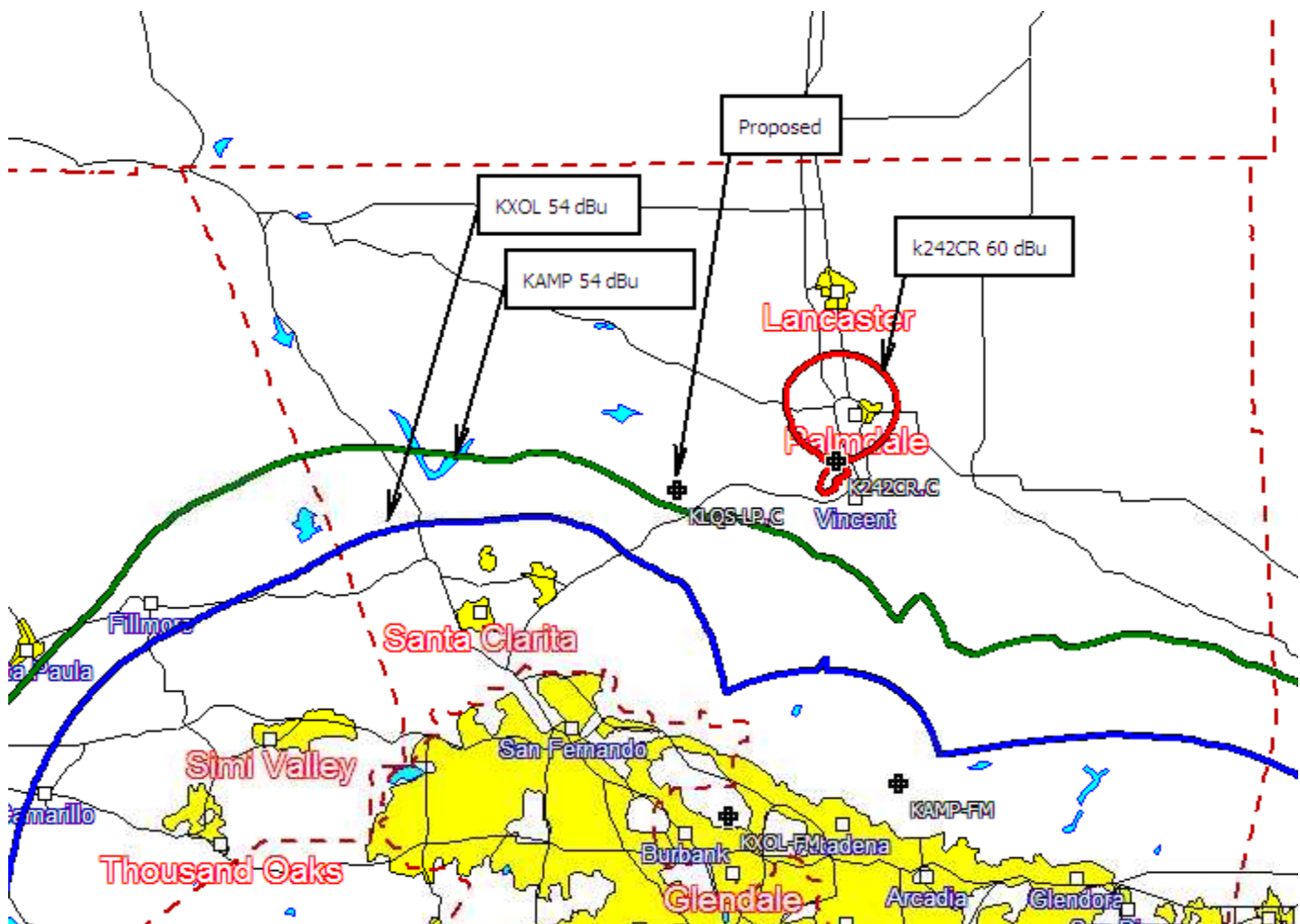


Figure 6: Protected Channel Spacing.