

SEPTEMBER 2002

EXHIBIT E-18

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PROPOSED KPRB
JMS BROADCASTING LLC
106.3 MHz CH.292C3 15 kW ERP H & V
BRUSH, COLORADO

ENGINEERING STATEMENT - ONE STEP UPGRADE

Concerning an application for Construction Permit and One Step Upgrade for KPRB Brush, Colorado.

JMS Broadcasting LLC herein requests the allotted Channel 292 be upgraded from Class A to Class C3 and applies for a Construction Permit to upgrade to Class C3 on FM Channel 292 (106.3 MHz) for Brush, Colorado.

The applicant is now applying for Channel 292 C3 with an effective radiated power of 15 kW horizontally and vertically polarized and an antenna height above average terrain of 81 m.

The applicant requests authorization of this construction permit under FCC Section 73.215.

JMS Broadcasting LLC has retained the services of Vir James P.C., Consulting Radio Engineers to prepare the engineering portions of this FM application.

PROPOSED SITE

The proposed KPRB operation will use the present KPRB antenna as presently mounted on the existing 67.3 m overall tower. The coordinates of the tower are as notified;

NL: 40 Deg 13 min 02 sec

WL: 103 Deg 41 min 46 sec

ALLOCATIONS - ONE STEP UPGRADE REFERENCE SITE

The proposed site is located short spaced to existing station KLEN under FCC Section 73.207 but within allowable spacing distances for authorization under FCC Section 73.215.

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UPGRADE REFERENCE SITE

The fully spaced reference site for the One Step Upgrade is specified on FCC Form 301. This site meets all criteria for Class C3 Allocation to Brush, Colorado.

The Reference coordinates are:

NL: 40 Deg 15 min 11 sec
WL: 103 Deg 34 min 21 sec

An allocation study of existing and proposed FM stations and allocations on file as of the date of this application shows that there are neither cochannel or adjacent channel FM stations within the minimum distance separations from the reference site as specified in Section 73.207 of the FCC rules.

CH.	FREQ.	NEAREST ALLOCATION		CALL	SEPARATION IN KM	
		CITY			ACTUAL	MIN REQ
289C3	105.7	Sterling	CO	KPMX	49	43
290C	105.9	Denver	CO	KALC	153	96
291A	106.1	Basalt	CO	KNFO	308	89
292C3	106.3	Cheyenne	WY	KLEN	153	153
293C1	106.5	Ogallala	NE	KMCX	186	144
294C	106.7	Denver	CO	KBPI	153	96
295A	106.9	Minatare	NE	ALLOC	173	42

There are no stations or allocations separated 10.6 or 10.8 MHz from 106.3 MHz located within 50 km therefore no IF interference could result at the reference site.

Therefore it is requested that the FCC table of FM Allotments in Section 73.202 be amended as follows:

Present Brush, SD 292A, 296C

Proposed Brush, SD 292C3, 296C

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PROPOSED FACILITY

The proposed KPRB operation will use the existing SWR Model FM3 4bay FM antenna at the 62 m level on the existing 67.3 m overall vertical, steel, guyed tower. A type accepted transmitter will be used. The transmitter building is located near the base of the tower. The main studio will remain at the presently authorized location.

The facility will comply with FCC RF power level standards under OET-65 by virtue of the height of the antenna above ground level. See Exhibit E-5. No employee will be allowed to climb the tower when energized. Power will be reduced or operation will cease as necessary when maintenance is needed to protect all employees.

ALLOCATIONS - PROPOSED SITE

A study of existing and proposed FM stations and allocations on file as of the date of this application shows that there are neither cochannel nor adjacent channel commercial FM stations within the minimum distance separations specified in Section 73.207 or 73.215(indicated by *) of the FCC rules.

CH.	FREQ.	NEAREST ALLOCATION		CALL	SEPARATION IN KM	
		CITY			ACTUAL	MIN REQ
289C3	105.7	Sterling	CO	KPMX	60	43
290C	105.9	Denver	CO	KALC	142	96
291A	106.1	Basalt	CO	KNFO	297	89
292C3	106.3	Cheyenne	WY	KLEN	147.9	142*
293C1	106.5	Ogallala	NE	KMCX	197	144
294C	106.7	Denver	CO	KBPI	142	96
295A	106.9	Minatare	NE	ALLOC	177	42

There are no stations or allocations separated 10.6 or 10.8 MHz from 106.3 MHz located within 50 km therefore no IF interference could result from the proposed operation.

The proposed KPRB interference and coverage contours shown along with the KLEN contours were computed in compliance with FCC Section 73.215 and are shown in Exhibit E-6D.

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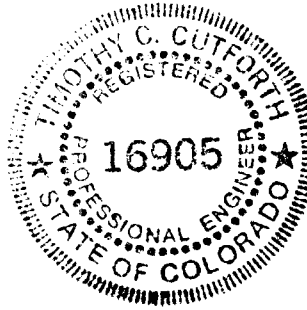
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SUMMARY

There will be no prohibited overlap resulting from the proposed KPRB operation based on FCC Section 73.215 standards and methods. The proposed operation meets FCC Section 73.215 standards for spacing as Class C3. The Reference site meets all standards for One Step Upgrade to Class C3 on Channel 292 assigned to Brush, Colorado.

Hence, the proposed operation on Channel 292C3 in Brush, Colorado would neither cause nor receive interference with respect to existing or proposed FM stations.

This application for an FM Construction Permit has been prepared in accordance with the appropriate parts of Section 73 of the FCC Rules and Regulations.



Respectfully submitted,

Timothy C. Cutforth, P.E.
18 September 2002