

**Engineering Statement
in Support of an
Application for a Construction Permit
KWOX, Channel 266C0, Woodward, Oklahoma**

General

The instant application is being filed for KWOX as a result of the Report and Order in MB Docket 05-136. As a result of KWOX downgrading from a class C to a class C0 facility, KVRO will be able to remain at its current licensed site and merely change frequency from channel 251A to channel 266A. KWOX will voluntarily downgrade to a class C0 facility and reduce its ERP from 100 kW to 84 kW to as to avoid overlap with KVRO at its current site on channel 266A. KWOX proposes no new construction in the instant application; it merely proposes a downgrade and a power reduction.

Exhibits Explained

Exhibit E, Figure 1 is a channel spacing study demonstrating that the proposed class C0 (at its current licensed site) is short spaced only to the proposed KVRO on channel 266A. As a result, KWOX will be accepting section 73.215 spacing.

Exhibit E, Figures 2 and 3 show that the proposed facility will continue to cover the city of license (Woodward, OK) easily after the proposed downgrade. Exhibit E, Figure 4 is a vertical sketch showing all pertinent elevations on the tower.

Exhibit E, Figures 5 and 6 are maps that show that the proposed KWOX class C0 operating at 84 kW will not create any prohibitive contour overlap. Exhibit E, Figure 6 is a zoomed view of the two contours (the KWOX interfering and the KVRO protected) that are closest to overlapping. This map clearly shows that no overlap will exist.

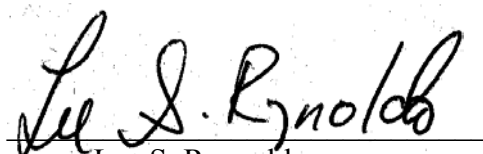
Human Exposure to Radiofrequency Radiation (No Exhibits)

Using the FCC Worksheet #1A, the proposed facility will produce approximately a power density of $45.8 \mu\text{W}/\text{cm}^2$ at a point 2 meters above ground directly under the tower (worst case scenario). This is well below the FCC's uncontrolled $200 \mu\text{W}/\text{cm}^2$ for uncontrolled areas and easily below the controlled limit as well ($1000 \mu\text{W}/\text{cm}^2$).

Conclusion

The proposed KWOX facility (84 kW ERP at 366 meters HAAT) at its current antenna location as a class C0 will be fully compliant with FCC rules and regulations.

For the applicant:



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Channel Spacing Study

| | | |
|-------------------------------------|------------------|-----------------|
| REFERENCE | | DISPLAY DATES |
| 36 16 06 N | CLASS = C0 | DATA 05-23-07 |
| 99 26 56 W | Current Spacings | SEARCH 06-07-07 |
| ----- Channel 266 - 101.1 MHz ----- | | |

| Call | Channel | Location | Dist | Azi | FCC | Margin |
|-------------|-----------------|-----------------|-----------------|--------------|--------------|----------------|
| KWOX | LIC 266C | Woodward | OK 0.00 | 0.0 | 281.0 | -281.00 |
| RDEL | DEL 266C | Woodward | OK 0.00 | 0.0 | 281.0 | -281.00 |
| RADD | ADD 266C | Woodward | OK 24.51 | 308.2 | 281.0 | -256.49 |

Of no concern:
Coordinates used by KWOX.

| | | | | | | |
|-------------|-----------------|-------------------|------------------|-------------|--------------|--------------|
| RADD | ADD 266A | Stillwater | OK 205.54 | 90.8 | 215.0 | -9.46 |
|-------------|-----------------|-------------------|------------------|-------------|--------------|--------------|

Of note:
Allocation (and proposed application site) for KVRO, Stillwater, OK on channel 266A. KVRO, although it is to be a section 215 station as a result of the application filed contingently with the instant application, is protected as a maximum class A facility (6 kW at 100 meters HAAT). See Exhibit E, Figures 5 and 6.

| | | | | | | | | |
|--------|-------|-------|----------------|----|--------|-------|-------|-------|
| KLAW | LIC-N | 267C1 | Lawton | OK | 207.81 | 156.4 | 196.0 | 11.81 |
| AL9245 | VAC | 267C3 | McLean | TX | 176.47 | 222.1 | 163.0 | 13.47 |
| AL8438 | VAC | 264C2 | Reydon | OK | 105.23 | 201.6 | 89.0 | 16.23 |
| KFDI-F | LIC | 267C | Wichita | KS | 240.45 | 44.5 | 220.0 | 20.45 |
| AU7057 | VAC | 269C2 | Sayre | OK | 109.79 | 189.1 | 89.0 | 20.79 |
| AP9959 | APP | 269C2 | Sayre | OK | 109.79 | 189.1 | 89.0 | 20.79 |
| AP3286 | APP | 269C2 | Sayre | OK | 115.73 | 182.6 | 89.0 | 26.73 |
| AL8610 | VAC | 268C3 | Okeene | OK | 113.75 | 90.7 | 87.0 | 26.75 |
| KXGL | LIC-N | 265C0 | Amarillo | TX | 241.19 | 244.6 | 207.0 | 34.19 |
| KREJ | LIC | 269C2 | Medicine Lodge | KS | 128.07 | 32.9 | 89.0 | 39.07 |
| RDEL | DEL | 265C2 | Quanah | TX | 223.32 | 181.2 | 176.0 | 47.32 |
| KWFB | LIC | 265C2 | Quanah | TX | 223.32 | 181.2 | 176.0 | 47.32 |

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Terrain/Contour Study

Reference Coordinates:

ERP: 84 kW

North Latitude: 36-16-6

West Longitude: 99-26-56

| Azimuth °T. | Ave. Elev. 3 to 16 km (Meters AMSL) | FM - 2-6 Tables Effective Antenna Height (Meters AAT) | ERP (dBk) | F(50-50) Distance to 70 dBu Contour (km) | F(50-50) Distance to 60 dBu Contour (km) |
|----------------|--|--|--------------|---|---|
| 0 | 667.2 | 376.8 | 19.243 | 53.3 | 76.3 |
| 5 | 664.3 | 379.7 | 19.243 | 53.5 | 76.5 |
| 10 | 661.0 | 383.0 | 19.243 | 53.7 | 76.7 |
| 15 | 654.0 | 390.0 | 19.243 | 54.0 | 77.2 |
| 20 | 648.7 | 395.3 | 19.243 | 54.3 | 77.6 |
| 25 | 642.5 | 401.5 | 19.243 | 54.7 | 78.1 |
| 30 | 639.7 | 404.3 | 19.243 | 54.8 | 78.3 |
| 35 | 635.2 | 408.8 | 19.243 | 55.1 | 78.6 |
| 40 | 631.3 | 412.7 | 19.243 | 55.3 | 78.9 |
| 45 | 631.2 | 412.8 | 19.243 | 55.3 | 78.9 |
| 50 | 631.6 | 412.4 | 19.243 | 55.3 | 78.9 |
| 55 | 633.2 | 410.8 | 19.243 | 55.2 | 78.8 |
| 60 | 635.1 | 408.9 | 19.243 | 55.1 | 78.6 |
| 65 | 633.4 | 410.6 | 19.243 | 55.2 | 78.7 |
| 70 | 629.3 | 414.7 | 19.243 | 55.4 | 79.1 |
| 75 | 628.7 | 415.3 | 19.243 | 55.4 | 79.1 |
| 80 | 629.7 | 414.3 | 19.243 | 55.4 | 79.0 |
| 85 | 629.1 | 414.9 | 19.243 | 55.4 | 79.1 |
| 90 | 627.1 | 416.9 | 19.243 | 55.5 | 79.2 |
| 95 | 630.5 | 413.5 | 19.243 | 55.3 | 79.0 |
| 100 | 636.6 | 407.4 | 19.243 | 55.0 | 78.5 |
| 105 | 644.5 | 399.5 | 19.243 | 54.6 | 77.9 |
| 110 | 649.9 | 394.1 | 19.243 | 54.3 | 77.5 |
| 115 | 653.1 | 390.9 | 19.243 | 54.1 | 77.3 |
| 120 | 658.1 | 385.9 | 19.243 | 53.8 | 76.9 |
| 125 | 662.9 | 381.1 | 19.243 | 53.6 | 76.6 |
| 130 | 667.8 | 376.2 | 19.243 | 53.3 | 76.2 |
| 135 | 673.5 | 370.5 | 19.243 | 53.0 | 75.8 |
| 140 | 679.7 | 364.3 | 19.243 | 52.6 | 75.3 |
| 145 | 683.8 | 360.2 | 19.243 | 52.3 | 75.0 |
| 150 | 686.8 | 357.2 | 19.243 | 52.2 | 74.8 |
| 155 | 688.8 | 355.2 | 19.243 | 52.0 | 74.7 |

Continued on next page

ERP: 84 kW

| Azimuth °T. | Ave. Elev. 3 to 16 km (Meters AMSL) | FM - 2-6 Tables Effective Antenna Height (Meters AAT) | ERP (dBk) | F(50-50) Distance to 70 dBu Contour (km) | F(50-50) Distance to 60 dBu Contour (km) |
|----------------|--|--|--------------|---|---|
| 160 | 690.3 | 353.7 | 19.243 | 52.0 | 74.6 |
| 165 | 691.5 | 352.5 | 19.243 | 51.9 | 74.5 |
| 170 | 693.3 | 350.7 | 19.243 | 51.8 | 74.4 |
| 175 | 697.1 | 346.9 | 19.243 | 51.5 | 74.1 |
| 180 | 700.8 | 343.2 | 19.243 | 51.3 | 73.8 |
| 185 | 703.5 | 340.5 | 19.243 | 51.1 | 73.6 |
| 190 | 706.1 | 337.9 | 19.243 | 51.0 | 73.4 |
| 195 | 706.6 | 337.4 | 19.243 | 50.9 | 73.4 |
| 200 | 705.4 | 338.6 | 19.243 | 51.0 | 73.5 |
| 205 | 703.3 | 340.7 | 19.243 | 51.1 | 73.6 |
| 210 | 700.5 | 343.5 | 19.243 | 51.3 | 73.8 |
| 215 | 705.5 | 338.5 | 19.243 | 51.0 | 73.5 |
| 220 | 710.9 | 333.1 | 19.243 | 50.6 | 73.1 |
| 225 | 715.7 | 328.3 | 19.243 | 50.3 | 72.7 |
| 230 | 720.4 | 323.6 | 19.243 | 50.0 | 72.4 |
| 235 | 725.5 | 318.5 | 19.243 | 49.7 | 72.0 |
| 240 | 726.1 | 317.9 | 19.243 | 49.7 | 72.0 |
| 245 | 724.6 | 319.4 | 19.243 | 49.8 | 72.1 |
| 250 | 720.0 | 324.0 | 19.243 | 50.1 | 72.4 |
| 255 | 716.1 | 327.9 | 19.243 | 50.3 | 72.7 |
| 260 | 713.1 | 330.9 | 19.243 | 50.5 | 72.9 |
| 265 | 707.1 | 336.9 | 19.243 | 50.9 | 73.3 |
| 270 | 702.9 | 341.1 | 19.243 | 51.2 | 73.7 |
| 275 | 699.5 | 344.5 | 19.243 | 51.4 | 73.9 |
| 280 | 695.4 | 348.6 | 19.243 | 51.6 | 74.2 |
| 285 | 693.5 | 350.5 | 19.243 | 51.8 | 74.3 |
| 290 | 691.5 | 352.5 | 19.243 | 51.9 | 74.5 |
| 295 | 691.6 | 352.4 | 19.243 | 51.9 | 74.5 |
| 300 | 691.4 | 352.6 | 19.243 | 51.9 | 74.5 |
| 305 | 692.1 | 351.9 | 19.243 | 51.8 | 74.4 |
| 310 | 690.5 | 353.5 | 19.243 | 51.9 | 74.6 |
| 315 | 688.2 | 355.8 | 19.243 | 52.1 | 74.7 |
| 320 | 688.5 | 355.5 | 19.243 | 52.1 | 74.7 |
| 325 | 689.8 | 354.2 | 19.243 | 52.0 | 74.6 |
| 330 | 690.8 | 353.2 | 19.243 | 51.9 | 74.5 |
| 335 | 692.6 | 351.4 | 19.243 | 51.8 | 74.4 |
| 340 | 689.4 | 354.6 | 19.243 | 52.0 | 74.6 |
| 345 | 684.3 | 359.7 | 19.243 | 52.3 | 75.0 |
| 350 | 679.6 | 364.4 | 19.243 | 52.6 | 75.4 |
| 355 | 672.5 | 371.5 | 19.243 | 53.0 | 75.9 |

KWOX

Latitude: 36-16-06 N
Longitude: 099-26-56 W
ERP: 84.00 kW
Channel: 266
Frequency: 101.1 MHz
AMSL Height: 1044.0 m
Elevation: 692.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

**KWOX, Channel 266C0, Woodward, OK
Proposed FCC Contours Map**

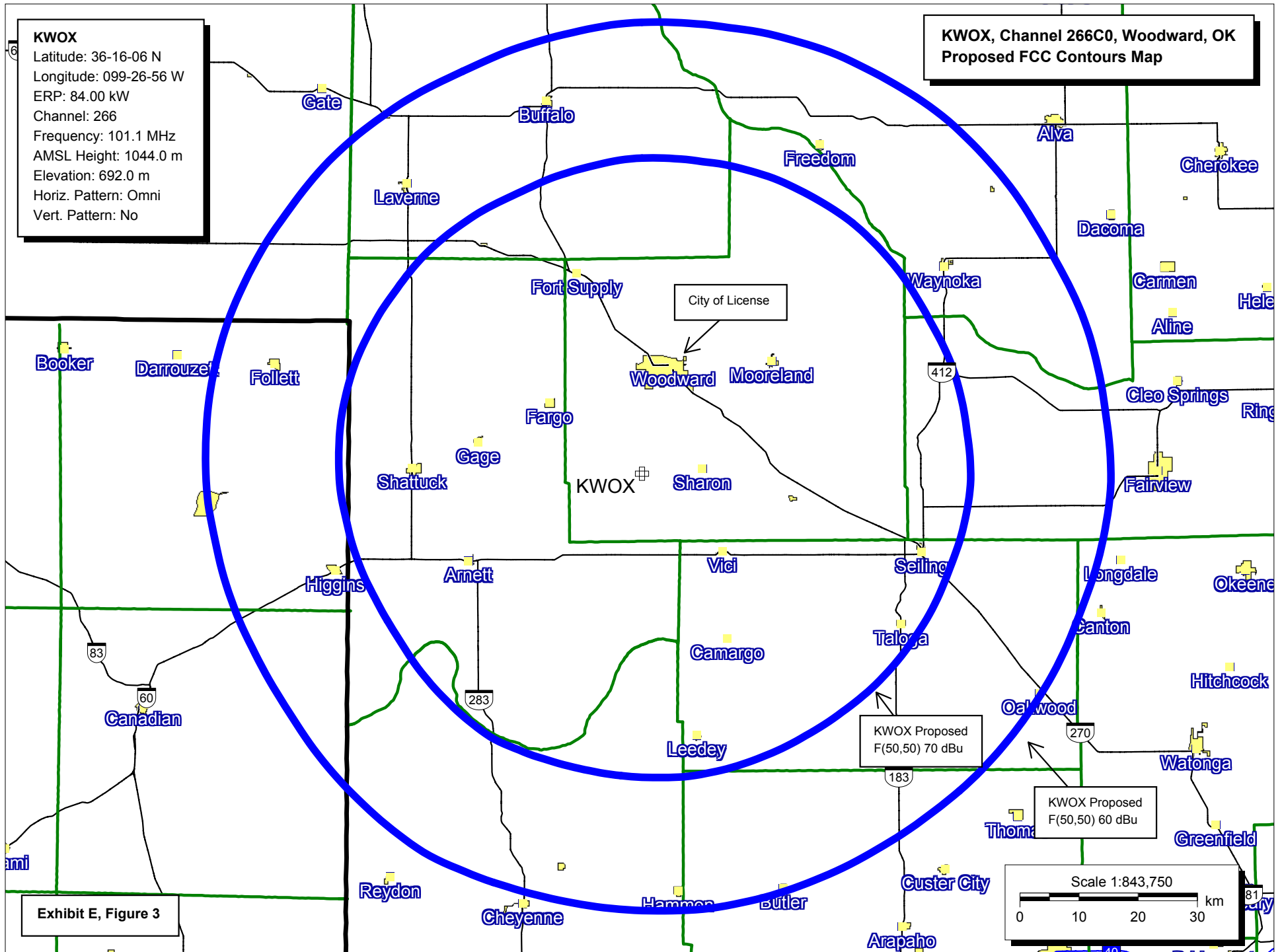
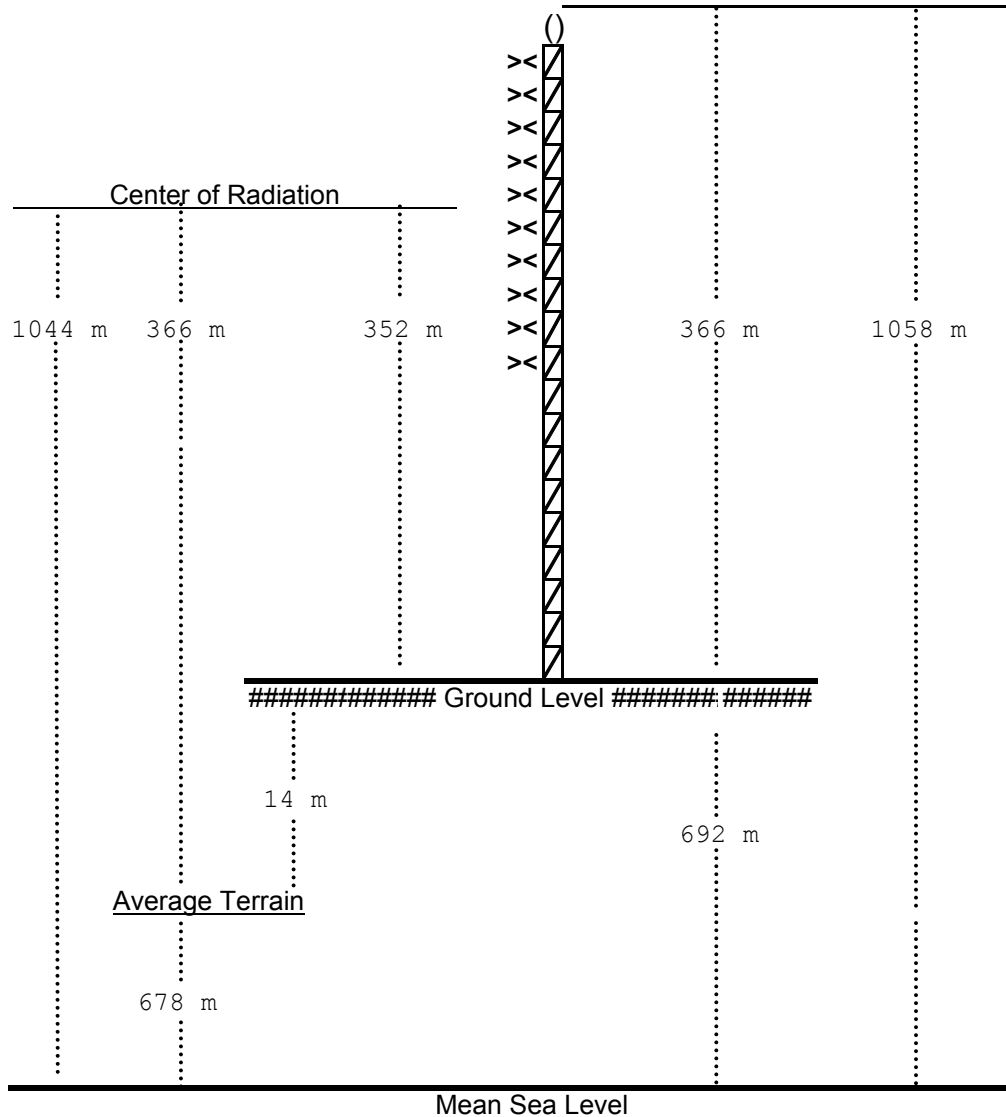


Exhibit E, Figure 3

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Vertical Sketch



Proposed Location: 36° 16' 6" N. Lat.

99° 26' 56" W. Long. [NAD27]

NOT DRAWN TO SCALE

Proposed Antenna: 10 elements

KVRO

Latitude: 36-13-10 N
Longitude: 097-09-47 W
ERP: 6.00 kW
Channel: 266
Frequency: 98.1 MHz
AMSL Height: 413.0 m
Elevation: 338.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KWOX

Latitude: 36-16-06 N
Longitude: 099-26-56 W
ERP: 84.00 kW
Channel: 266
Frequency: 101.1 MHz
AMSL Height: 1044.0 m
Elevation: 692.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

**KVRO, Channel 266A, Stillwater, OK
KWOX, Channel 266C0, Woodward, OK
Protected and Interfering Contours
(Showing No Contour Overlap)**

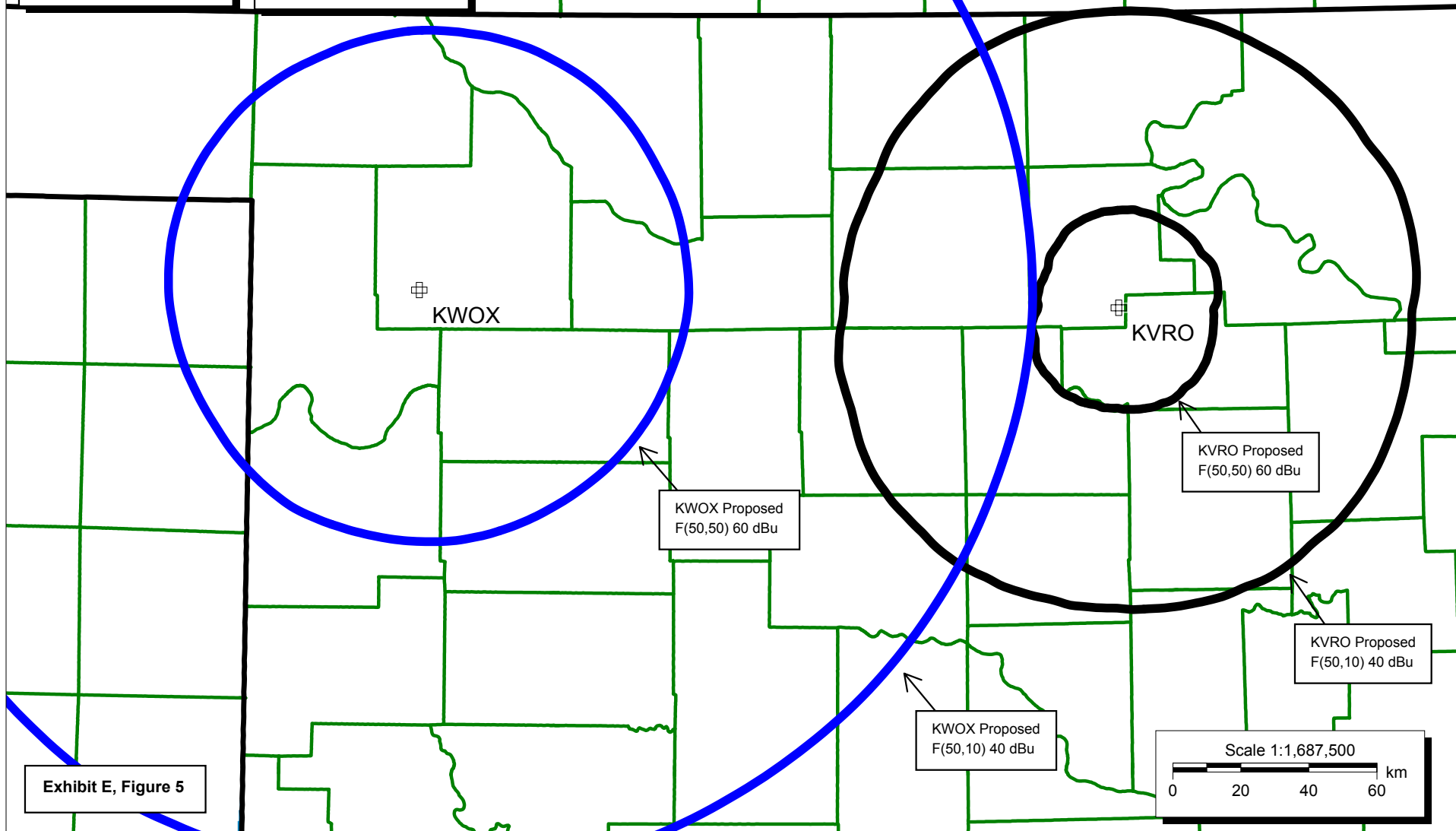


Exhibit E, Figure 5

KVRO

Latitude: 36-13-10 N
Longitude: 097-09-47 W
ERP: 6.00 kW
Channel: 266
Frequency: 98.1 MHz
AMSL Height: 413.0 m
Elevation: 338.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KWOX

Latitude: 36-16-06 N
Longitude: 099-26-56 W
ERP: 84.00 kW
Channel: 266
Frequency: 101.1 MHz
AMSL Height: 1044.0 m
Elevation: 692.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KVRO, Channel 266A, Stillwater, OK
F(50,50) 60 dBu Contour
KWOX, Channel 266C0, Woodward, OK
F(50,10) 40 dBu Contour
Zoomed View
(Showing No Contour Overlap)

KVRO Proposed
F(50,50) 60 dBu

KWOX Proposed
F(50,10) 40 dBu

Exhibit E, Figure 6

Scale 1:24,000

0 0.33 0.67 1.0 km