ENGINEERING REPORT RE
APPLICATION TO CHANGE PRINICAPAL COMMUNITY
AND CLASS OF AM STATION

KCKY, APACHE JUNCTION, ARIZONA

1150 kHz – 0.185N / 5 D kW – DA-1

DECEMBER 2004

Exhibit 11 - FCC Form 301, Section III-AM Engineering Technical Specifications

INTRODUCTION

This engineering report has been prepared on behalf of Cortaro Broadcasting Corporation, licensee of radio station KCKY(AM), Coolidge, Arizona and is in support of a major change application to change the station's principal community to Apache Junction and the Class of station from a Class B to a Class D with a secondary nighttime service. KCKY(AM) is currently licensed for operation on 1150 kHz with 5 kW power daytime and 1 kW nighttime utilizing different directional antenna systems (DA-2).

This instant application has been prepared in accordance with the applicable Commission's AM Rules and requests a modification of the KCKY(AM) license to change principal community and continue operation with the licensed daytime power of 5 kW, with its current daytime directional antenna parameters. The proposed secondary nighttime operation will utilize the licensed daytime directional pattern with the power reduced to 185 watts which results in an antenna efficiency of 132.8 mV/m at one kilometer (see attached directional pattern). KCKY proposes to utilize the existing two tower KCKY directional daytime antenna system for the day and secondary nighttime operation. No other changes to the station's operations are proposed.

ANTENNA SITE

There is no change proposed to the existing antenna site which is located approximately 4.5 kilometers northwest of Coolidge, Pinal County, Arizona. The geographic coordinates (NAD-27) corresponding to the center of the existing KCKY daytime antenna array are as follows:

North Latitude: 33° 00' 27"
West Longitude: 111° 32' 57"

DAYTIME ALLOCATION SITUATION

Since the proposed changes do not impact the KCKY daytime allocation situation, the requirements of Section 73.37 of the Commission's Rules concerning prohibitive contour overlap have not been addressed or considered relevant to the requested changes in the KCKY facilities.

NIGHTTIME ALLOCATION SITUATION

The proposed changes in the nighttime operation of KCKY are to reduce the current licensed power of 1 kW to 0.185 kW and utilize the current licensed directional daytime antenna parameters as previously indicated. Since KCKY would only be reducing the input power to the

presently licensed directional daytime antenna system, the station will operate as a DA-1. The proposed 0.185 kW nighttime directional secondary operation of KCKY(AM) will not cause any predicted increase to the RSS nighttime limitation of other co or adjacent channel AM stations in accordance with FCC engineering allocation standards prescribed in Section 73.182 of the Commission's Rules. In fact, the nighttime interference level to several stations would be reduced as indicated below:

		Existing RSS		Proposed RSS	
Call	City/State	50% (mV/m)	25% (mV/m)	50% (mV/m)	25% (mV/m)
WJBO	Baton Rouge, LA	4.0	4.9	4.0	4.6
KSVE	El Paso, TX	15.0	16.2	12.1	13.4
KDEF	Albuquerque, NM	12.3	14.1	12.3	13.7
KAGO	Klamath Falls, OR	5.7	7.3	5.7	7.2
KKNW	Seattle, WA	3.2	4.3	3.2	4.2

The nighttime allocation data showing the present and proposed nighttime limitations are attached in Exhibit 16.

CONTOUR DATA

Exhibit 12 shows the computed 5 mV/m daytime contour in relation to KCKY's proposed community of license, Apache Junction, AZ. The KCKY 5 kW daytime directional operation will provide 5 mV/m service to all of Apache Junction and therefore, is in compliance to the community coverage requirement. The conductivity basis and distance to the 5 mV/m contour are shown in Exhibit 14 (attached).

1 V/m CONTOUR

Since there would be no change in the 1 mV/m contour, Section 73.24(g) of the Rules is not applicable.

MAIN STUDIO LOCATION

The main studio will be located within the predicted 5 mV/m daytime contour of KCKY(AM).

FAA DATA

Notification to the FAA has not been submitted since the proposal does not involve any tower modification. Additionally, both towers have FCC antenna structure registration (Nos. 1242681, 1242682).

ENVIRONMENTAL STATEMENT

An environmental assessment (EA) is categorically excluded under Section 1.1307 of the FCC Rules and Regulations since the towers are registered and there is no construction associated with the existing two tower antenna site.

KCKY has previously certified compliance with the FCC specified standards for human exposure to RF radiation as set forth in the OET Bulletin No. 65 dated August 1997. Since there are no changes proposed in the daytime power, the RFF compliance issues are unchanged.

With respect to workers having access to the site or tower, KCKY has established procedures which include reducing or terminating the transmitter power to ensure that workers are not exposed to levels of RF Fields in excess of the Commission's guidelines.

The Commission guidelines for the AM band are the same (614 V/m Electric Field and 1.63 A/m Magnetic Field) for the occupational/controlled environment and for the general population/uncontrolled environment. For the reasons stated above, this proposal does not involve any action specified in Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.