

Exhibit B-17
KPPT-FM Channel 264C2 Depoe Bay, Oregon
NIER Analysis

Facilities Proposed

The proposed operation will be on Channel 264C2 (100.7 MHz) with an effective radiated power of 17.5 kilowatts. Continued operation is proposed with the existing 5-element circularly-polarized omni-directional antenna, which is side-mounted on a tower located at the Otter Crest transmitter site.

The antenna support structure does not exceed 60.96 meters (200 feet) above ground and does not require notification to the Federal Aviation Administration. Therefore, this structure does not require an Antenna Structure Registration Number.

NIER Calculations

The Otter Crest transmitter site is an established antenna farm on a ridge which is only accessible by a rugged access road protected by a substantial locked gate. Public access is strictly restricted and the site is considered to be a controlled environment.

It should be noted that no change is proposed in the KPPT transmitting facilities. Location, height, antenna type, and power will remain the same as are presently in use and authorized under BLH-20011204ABC. The only change proposed by this application is a change in community of license, consistent with the Report and Order in MB Docket No. 02-255.

In addition to KPPT, seven other FM stations operate from this transmitter site:

KLCO 213C3 Newport

KNCU 224C3 Newport

KSND 236C2 Lincoln City

KCRF 244C1 Lincoln City

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KSHL 248C2 Gleneden Beach

KYTE 274C1 Newport

KDEP 288C3 Depoe Bay

(Several television translators operate from sites which are at least 250 meters distant from KPPT. Thus, the ground level NIER values from the translators in the vicinity of the KPPT tower are believed to be negligible.)

KNCU, KCRF, KSHL, and KYTE are co-located on a single tower approximately 90 meters from the KPPT tower. KSND is located approximately 180 meters from the KPPT tower. KLCO and KDEP are located approximately 240 meters from the KPPT tower.

Calculations of the power density produced by the KPPT antenna system alone have been made using the FMModel program, and assume a Type 2 element pattern, which is the element pattern for the SWR FM3/5 "double V" antenna used by that station. The highest calculated ground level power density occurs at a distance of 8 meters from the base of the tower. At this point the power density is calculated to be 264.1 FW/cm². The KPPT ground level power density level falls below 50 FW/cm² (i.e. 5% of 1000 FW/cm², the FCC standard for controlled environments) at 15 meters from the tower, and never rises above 40 FW/cm² at points beyond 15 meters.

Since the maxima from the various stations operating at Otter Crest do not coincide, an analysis has been made of the combined contributions on a 5 meter grid covering the hilltop. The assumptions and caveats recommended by OET-65 (as revised) have been employed in this analysis. This methodology has previously been applied to existing antenna operations at the Lookout Mountain transmitter site near Denver, and the results compared well with spatially-averaged measured values of NIER at that site.

Most of the stations operating from this transmitter site have a tower base elevation of 311 meters, so that figure has been used as the base elevation for this study. The KPPT tower

site has a base elevation of 303 meters, so the KPPT antenna height above ground has been adjusted down from 25 meters to 17 meters for the purposes of this study.

According to this analysis, no location is predicted to have a maximum combined exposure (spatially averaged) of more than 40% of the controlled environment standard.

It should be noted that as a result of the same proceeding which changed the KPPT community of license to Depoe Bay, station KDEP 288C3 Depoe Bay will be relocating about 75 kilometers north to the community of Garibaldi. In addition, station KSND 236C2 Lincoln City has recently been approved to relocate inland to the community of Monmouth. Thus, it is anticipated that in the near future KDEP and KSND will no longer be operating from the Otter Crest transmitter site.

Public access to the site is restricted by a locked gate and the antenna tower is posted with warning signs. Pursuant to OST Bulletin No. 65, all station personnel and contractors are required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.

The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency radiation in excess of FCC guidelines.

Spatially-Averaged NIER Calculations at Otter Crest

EXPOSURE HEIGHT = 2.0 METERS Above 311m level ground
 GRID SPACING = 5.0 METERS
 PERCENT-OF-LIMIT VALUES (GRID DIMENSIONS IN METERS):

	-100	-075	-050	-025	+000	+025	+050	
+075	.	-	-	-	-	-	-	+075
+070	-	-	-	-	-	-	-	+070
+065	-	-	-	-	-	-	-	+065
+060	-	-	-	-	-	-	-	+060
+055	-	-	-	-	-	-	-	+055
+050	-	-	-	-	-	-	-	+050
+045	-	-	-	-	-	-	-	+045
+040	-	-	-	-	-	-	-	+040
+035	-	-	-	-	-	-	-	+035
+030	-	+	*	+	+	+	+	+030
+025	-	+	*	+	+	+	+	+025
+020	-	+	+	+	+	+	+	+020
+015	-	+	+	+	+	+	+	+015
+010	-	+	+	+	+	+	+	+010
+005	-	+	+	+	+	+	+	+005
+000	-	+	+	+	+	+	+	+000
-005	-	+	+	+	+	+	+	-005
-010	-	+	+	+	+	+	+	-010
-015	-	+	+	+	+	+	+	-015
-020	-	+	+	+	+	+	+	-020
-025	-	+	+	+	+	+	+	-025
-030	-	+	+	+	+	+	+	-030
-035	-	+	+	+	+	+	+	-035
-040	-	+	+	+	+	+	+	-040
-045	-	+	+	+	+	+	+	-045
-050	-	+	+	+	+	+	+	-050
-055	-	+	+	+	+	+	+	-055
-060	-	+	+	+	+	+	+	-060
-065	-	+	+	+	+	+	+	-065
-070	-	+	+	+	+	+	+	-070
-075	-	+	+	+	+	+	+	-075

TABLE OF STATION DATA

STATION	FREQ.(MHz)	X(m)	Y(m)	ERP(kW)	HT.(m)	ANTENNA	LAMBDA	MPE
KPPT FM	100.700	-85.0	29.0	35.000	17.0	5 bay dblv	1.000	1.000
KSND FM	95.100	90.0	63.0	12.000	25.0	4 bay roto	0.500	1.000
KNCU FM	92.700	0.0	0.0	7.600	27.0	3 bay roto	1.000	1.000
KCRF FM	96.700	0.0	0.0	39.000	40.0	5 bay roto	1.000	1.000
KSHL FM	97.500	0.0	0.0	34.000	28.0	2 bay dblv	1.000	1.000
KYTE FM	102.700	0.0	0.0	132.000	39.0	4 bay dblv	1.000	1.000
KLCO FM	90.500	158.0	64.0	6.000	27.0	4 bay roto	0.500	1.000
KDEP FM	105.500	158.0	64.0	7.200	24.0	3 bay dblv	1.000	1.000

SPATIALLY AVERAGED: (BLANK) LESS THAN 1% OF CONTROLLED AREA M.P.E.
 UNCONTROLLED AREA . 1% TO LESS THAN 5%
 " " - 5% TO LESS THAN 10%
 " " + 10% TO LESS THAN 20%
 CONTROLLED AREA * 20% TO LESS THAN 50%
 " " # 50% TO LESS THAN 100%
 PROHIBITED AREA & 100% TO LESS THAN 500%
 " " @ 500% TO LESS THAN 1000%
 " " M 1000% OR HIGHER

X KPPT TOWER LOCATION

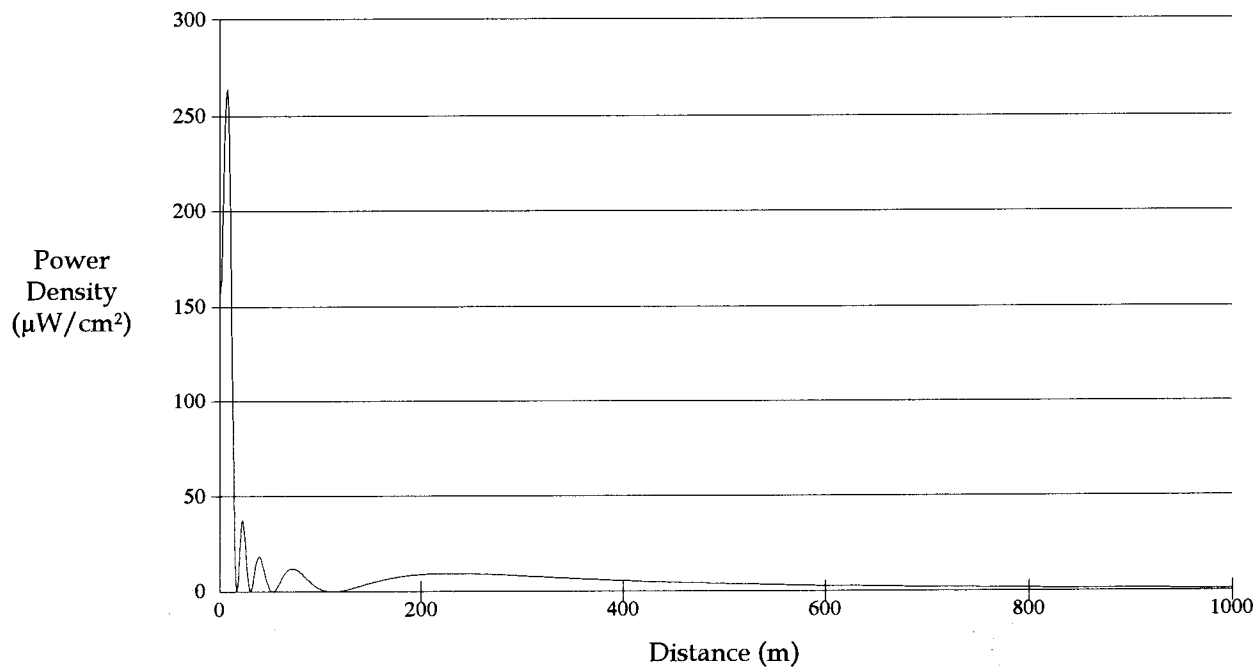
Y KYTE TOWER LOCATION

(OTHER TOWERS ARE BEYOND THE BOUNDS OF THIS STUDY, BUT WITH NO AREAS ABOVE THE CONTROLLED AREA M.P.E.)

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TABLE OF INDIVIDUAL STATION MAXIMA					
STATION	FREQ.(MHz)	X(m)	Y(m)	S.A.(%)	%@BASE OF TOWER
KPPT FM	100.700	-90.0	30.0	26.480	0.490
KSND FM	95.100	35.0	-10.0	0.681	0.501
KNCU FM	92.700	-10.0	10.0	1.841	0.167
KCRF FM	96.700	-10.0	10.0	3.054	0.114
KSHL FM	97.500	-5.0	15.0	14.575	1.143
KYTE FM	102.700	-10.0	10.0	19.771	0.665
KLCO FM	90.500	50.0	65.0	0.286	0.116
KDEP FM	105.500	158.0	64.0	1.255	1.255
MAXIMUM EXPOSURE		15.0	0.0	40.143	

Power Density vs Distance



Ground-Level NIER Analysis

OET FMModel

KPPT-FM Depoe Bay

Antenna Type: SWR FM3/5

Number of Elements: 5

Element Spacing: 1.0 wavelength

Distance: 1000 meters

Horizontal ERP: 17.5 kW

Vertical ERP: 17.5 kW

Antenna Height: 25 meters AGL

Maximum Power Density is 264.1 $\mu\text{W}/\text{cm}^2$ at 8 meters from the antenna structure.

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