

Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

It either or both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Academy Communications

Minor Modification to K292FM CP Change Location, Pattern, Power, HAMSL Average Protected F(50-50)= 4.02 km											
CH# 292D - 106.3 MHz, Pwr= 0.027 kW, HAAT=0.0 M, COR= 2330 M Ave. F(50-10) 40 dBu= 12.9 54 dBu= 5.7 80 dBu= 1.6 100 dBu= .4										DI SPLAY DATES DATA 12-20-06 SEARCH 12-20-06	
CH CITY	CALL	TYPE STATE	AZI. <--	DI ST FI LE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LI CENSEE	*IN* (Overl ap in km)	*OUT*	
294C Denver	KBPI . A	APP CO CY	343.1 163.1	25.70 BPH20030424AAP	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Jacor	2.58 Broadcasting	-47.45*< Of Colo	
294C Denver	KBPI . A	APP CO CY	343.1 163.1	25.70 BPH20030424AAP	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Jacor	2.58 Broadcasting	-47.45*< Of Colo	
290C Denver	KALC. C	CP CO CY	343.1 163.1	25.70 BMPH20020927AAT	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Entercom	2.58 Denver License, L	-47.45*<	
290C Denver	KALC	LI C CO C	343.1 163.1	25.70 BLH20050602ABO	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Entercom	2.58 Denver License, L	-47.45*<	
294C Denver	KBPI . A	APP CO CY	343.1 163.1	25.70 BPH20030424AAP	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Jacor	2.58 Broadcasting	-47.45*< Of Colo	
294C Denver	KBPI	LI C CO CN	343.0 162.9	25.75 BLH19851120KCC	39 43 59 105 14 12	100.000 323	2316 10.5	74.1 Jacor	2.41 Broadcasting	-48.60*< Of Colo	
294CO Denver	KBPI . A	APP CO CY	343.1 163.1	25.70 BPH20061116ACX	39 43 58 105 14 08	100.000 306	2292 10.2	72.9 Jacor	2.58 Broadcasting	-47.45*< Of Colo	
292D Denver	K292FM	CP CO DC	148.3 328.4	16.50 BMPFT20050811ABR	39 23 06 105 02 51	0.005 211	2232 23.6	6.9 Educational	-8.92<	-0.08<	Communications
292C2 Wi defi el d	KKLI	LI C CO CN	163.8 344.0	88.62 BLH19901205KE	38 44 41 104 51 46	1.600 831	2933 132.6	56.6 Capstar Tx	-45.57<	23.33	Limited Partner
292D Boul der	AP0112	APP CO C	351.6 171.6	50.88 BNPFT20030317EME	39 57 53 105 14 07	0.099 -112	1699 18.5	5.6 Educational	19.84	0.67	Media Foundati
292D Westmin ster	AP5994	APP CO C	11.2 191.3	52.30 BNPFT20030317HFR	39 58 24 105 01 44	0.140 43	1674 24.5	7.3 Radio Assist	20.75	15.06	Ministry, Inc
292D Empire	KZMV-F	CP CO DV	301.1 120.7	61.48 BNPFTB20051205AD	39 47 42 105 45 49	0.000 865	3818 18.8	2.5 New Field	39.01	47.08	Broadcasting, LI
292C2 Kremml ing	KZMV	LI C CO NHX	306.4 125.7	115.13 BLH20051114AFN	40 07 12 106 14 13	50.000 158	2695 138.8	53.2 New Field	-29.13<	44.02	Broadcasting, LI
292D Dillon	KZMV-F	LI C CO DV	280.1 99.5	78.30 BLFTB20060522ACZ	39 37 51 106 02 47	0.487 -386	2786 28.3	8.4 New Field	47.14	60.78	Broadcasting, LI
292D Longmont	AP1531	APP CO DE	5.5 185.6	81.28 BNPFT20030312ACU	40 14 24 105 03 23	0.000 114	1637 3.4	0.7 Educational	68.67	44.40	Communications
292C2 Kremml ing	KZMV	RSV CO	305.0 124.3	124.57	40 08 51 106 20 49	50.000 -2359	0 115.0	26.5 New Field	4.70<	82.60	Broadcasting, LI
292D Granby	KZMV-F	LI C CO DC	311.4 130.9	89.46 BLFTB20040225ABC	40 02 24 105 56 11	0.006 -102	2534 9.0	2.8 New Field	73.70	64.07	Broadcasting, LI
292D Granby	KZMV-F	CP CO DC	311.4 130.9	89.46 BPFTB20051114AFR	40 02 24 105 56 11	0.006 -102	2534 9.0	2.8 New Field	73.70	64.07	Broadcasting, LI
292D Estes Park	AP1316	APP CO C	346.1 165.9	104.03 BNPFT20030313BES	40 25 13 105 26 39	0.010 237	2743 29.9	9.0 Educational	60.99	49.60	Media Foundati
292D Greel ey	AP2603	APP CO C	21.0 201.3	106.01 BNPFT20030317BNS	40 24 04 104 41 54	0.250 66	1500 36.0	10.6 Educational	65.76	73.39	Media Foundati
292D Ft. Coll ins	AP1545	APP CO DE	358.5 178.5	109.06 BNPFT20030312ADN	40 29 36 105 10 52	0.000 462	2078 1.6	0.2 Educational	96.09	66.66	Communications
292A Brush	KPRB	LI C CO C	57.2 238.1	146.91 BLH20010808ABF	40 13 02 103 41 46	3.000 56	1401 65.9	18.4 Northeast	70.38	86.09	Colorado Broadca
292C3 Brush	KPRB	RSV CO	61.8 242.9	159.44	40 10 33 103 29 49	25.000 -1335	0 99.8	22.7 Northeast	48.36	92.68	Colorado Broadca
292C3 Brush	KPRB. C	CP CO CX	61.8 242.9	159.44 BPH20020926ACP	40 10 33 103 29 49	25.000 95	1430 112.7	38.2 Northeast	35.50	77.15	Colorado Broadca
292D Eagle	KZMV-F	LI C CO DV	277.5 96.5	132.35 BLFTB20060814AAE	39 39 20 106 40 39	0.195 529	2841 84.4	28.2 New Field	45.28	95.61	Broadcasting, LI

290D	K290AK	LIC DC	164.2	74.69	38 51 50	0.000	2061	1.6	73.04	73.06
Col orado	Spr i ngs	CO	344.4	BLFT20050427ADP	104 54 49	-633	0.0	Educational	Communi cations	

Terrain database is NGDC 30 SEC
ERP and HAAT are on direct line to and from reference station.
"*"affixed to 'IN' or 'Out' values = site inside protected contour. "<" = contour overlap

Terrain and Contour Study

N. Lat. = 39 30 41 W. Lng. = 105 08 54

HAAT and Distance to Contour - FCC Method - 30 Arc. Sec.

K292FM Minor Modification

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	40-F1	100-F1
000	1794.3	535.7	0.0060	-22.23	0.471	11.06	41.45	0.17
030	1719.2	610.8	0.0006	-32.52	0.144	4.68	23.80	0.05
060	1676.8	653.2	0.0047	-23.28	0.417	11.03	43.64	0.15
090	1743.1	586.9	0.0066	-21.78	0.496	11.89	45.00	0.18
120	1772.2	557.8	0.0020	-26.96	0.273	7.70	31.52	0.10
150	2049.7	280.3	0.0001	-41.71	0.050	1.66	8.82	0.02
180	2148.9	181.1	0.0000	-44.09	0.038	1.38	6.11	0.01
210	2234.0	96.0	0.0000	-48.84	0.022	0.80	3.34	0.01
240	2394.9	-64.9	0.0000	-46.14	0.030	1.09	2.27	0.01
270	2493.5	-163.5	0.0019	-27.12	0.268	2.15	6.65	0.10
300	2328.1	1.9	0.0186	-17.29	0.831	3.68	11.81	0.30
330	2186.1	143.9	0.0243	-16.15	0.948	8.69	29.04	0.35

Ave El= 2045.06 M HAAT= 284.94 M AMSL= 2330

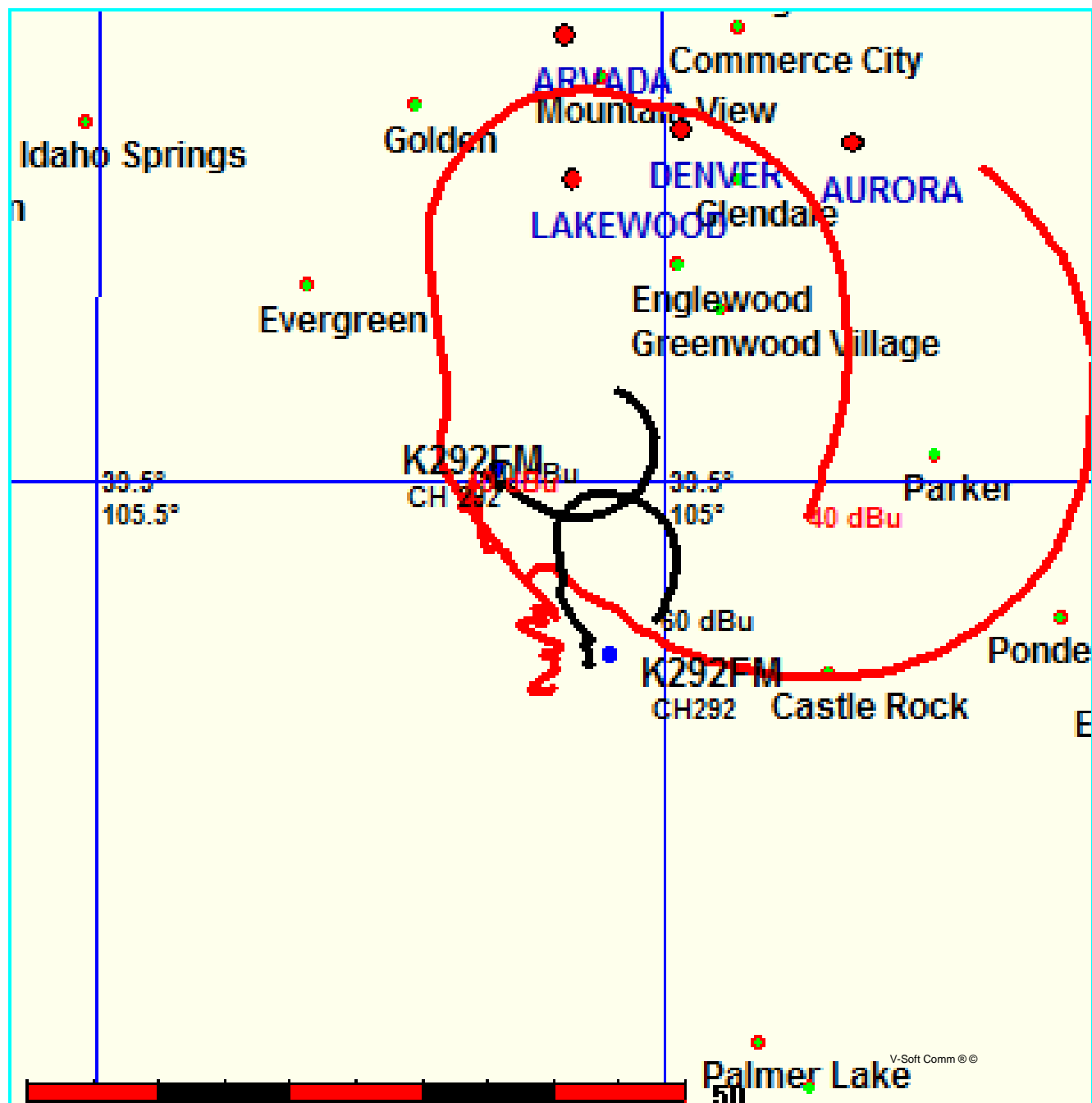
Minor Modification to K292FM CP
Present vs Proposed

FMCommander Allocation Study
12-20-2006

K292FM CH 292 D
0.027 kW 2330 M COR DA
Prot. = 60 dBu
Intef. = 40 dBu

K292FM CH 292 D BMPFT20050811ABR
0.01 kW, 2232 M COR DA
Prot. = 60 dBu
Intef. = 40 dBu

Scale = 1:750,000



Minor Modification to K292FM CP
vs AP292 Westminster, CO

FMCommander Allocation Study
12-20-2006

K292FM CH 292 D

0.027 kW 2330 M COR DA

Prot. = 60 dBu

Intef. = 40 dBu

AP5994 CH 292 D

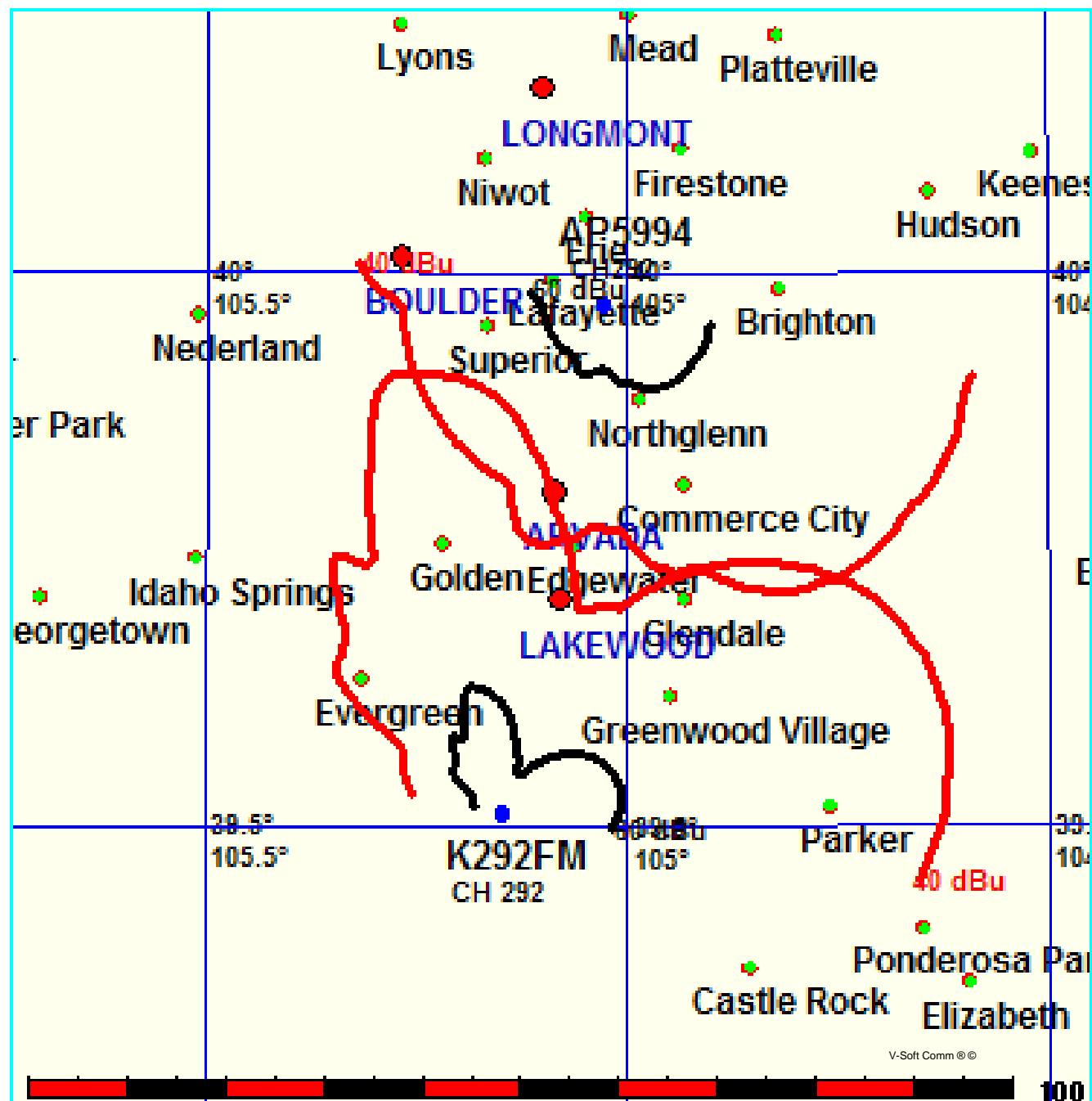
0.14 kW, 1674 M COR

Prot. = 60 dBu

Intef. = 40 dBu

BNPFT20030317HFR

Scale = 1:1,000,000



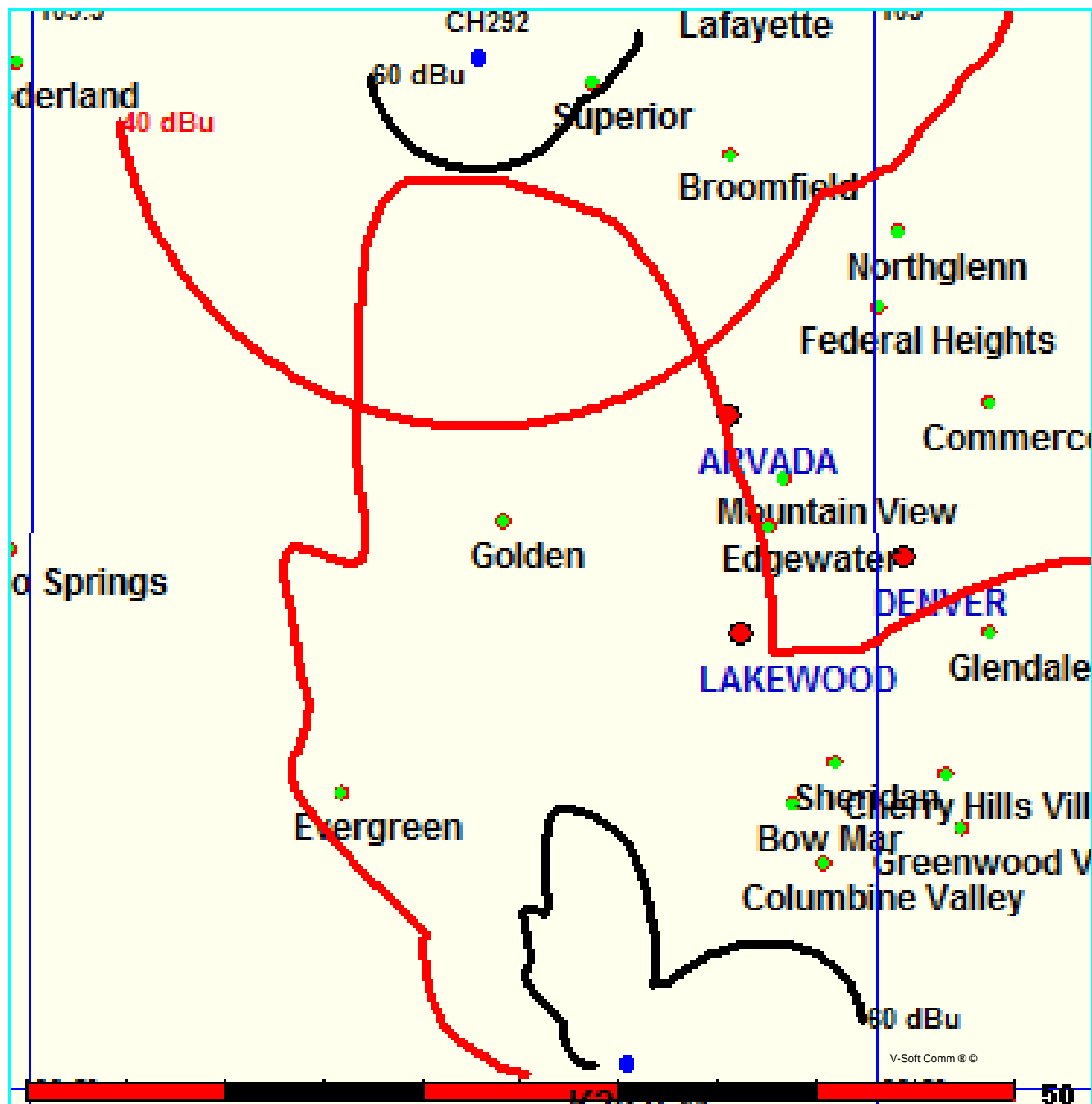
Minor Modification to K292FM CP
vs AP292 Boulder, CO

FMCommander Allocation Study
12-20-2006

K292FM CH 292 D
0.027 kW 2330 M COR DA
Prot. = 60 dBu
Intef. = 40 dBu

AP0112 CH 292 D BNPFT20030317EME
0.099 kW, 1699 M COR
Prot. = 60 dBu
Intef. = 40 dBu

Scale = 1:500,000



Minor Modification to K292FM CP
vs KKLI

FMCommander Allocation Study
12-20-2006

K292FM CH 292 D
0.027 kW 2330 M COR DA
Prot. = 60 dBu
Intef. = 40 dBu

KKLI CH 292 C2 BLH19901205KE
1.6 kW, 2933 M COR
Prot. = 60 dBu
Intef. = 40 dBu

Scale = 1:1,500,000

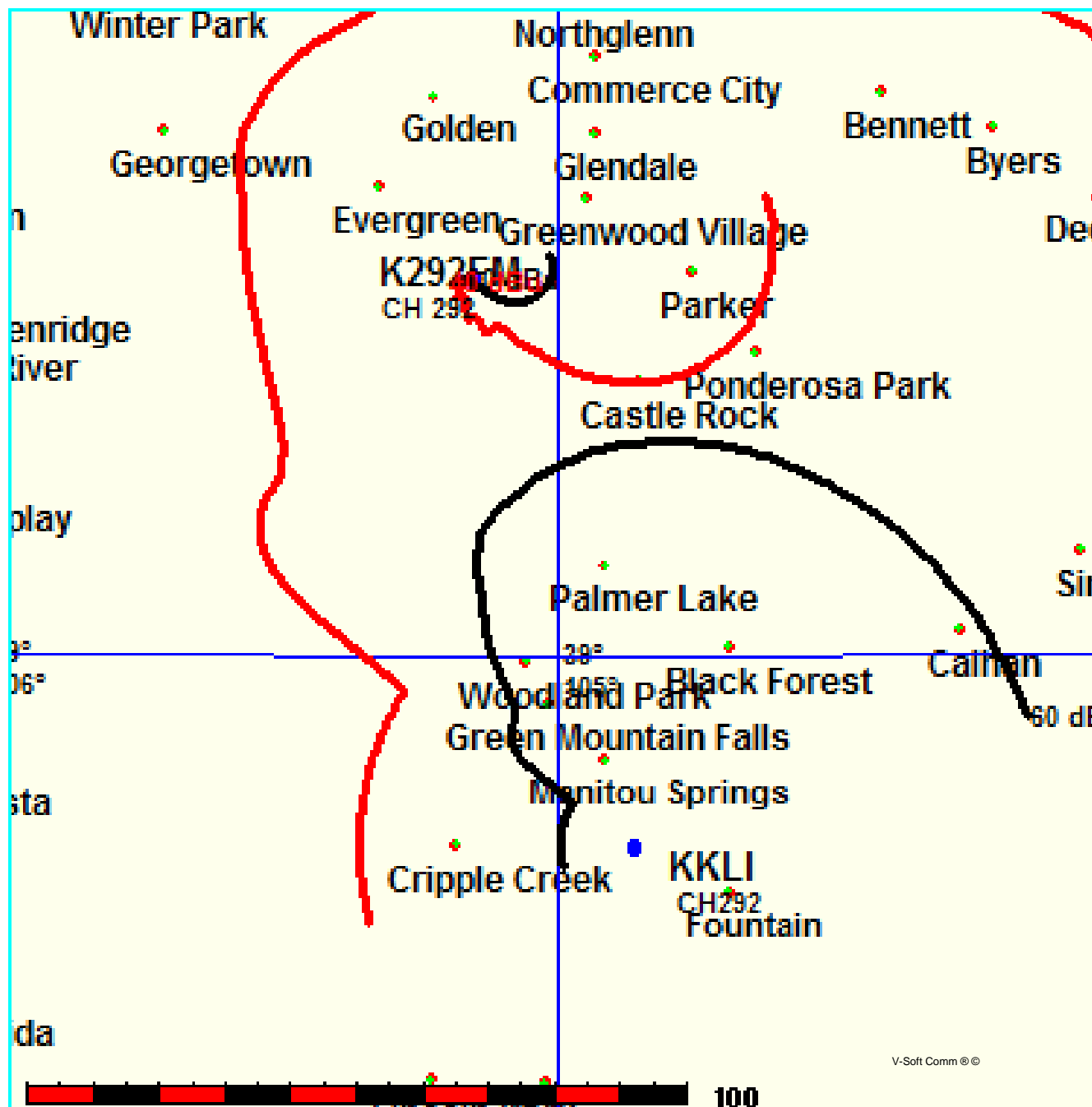
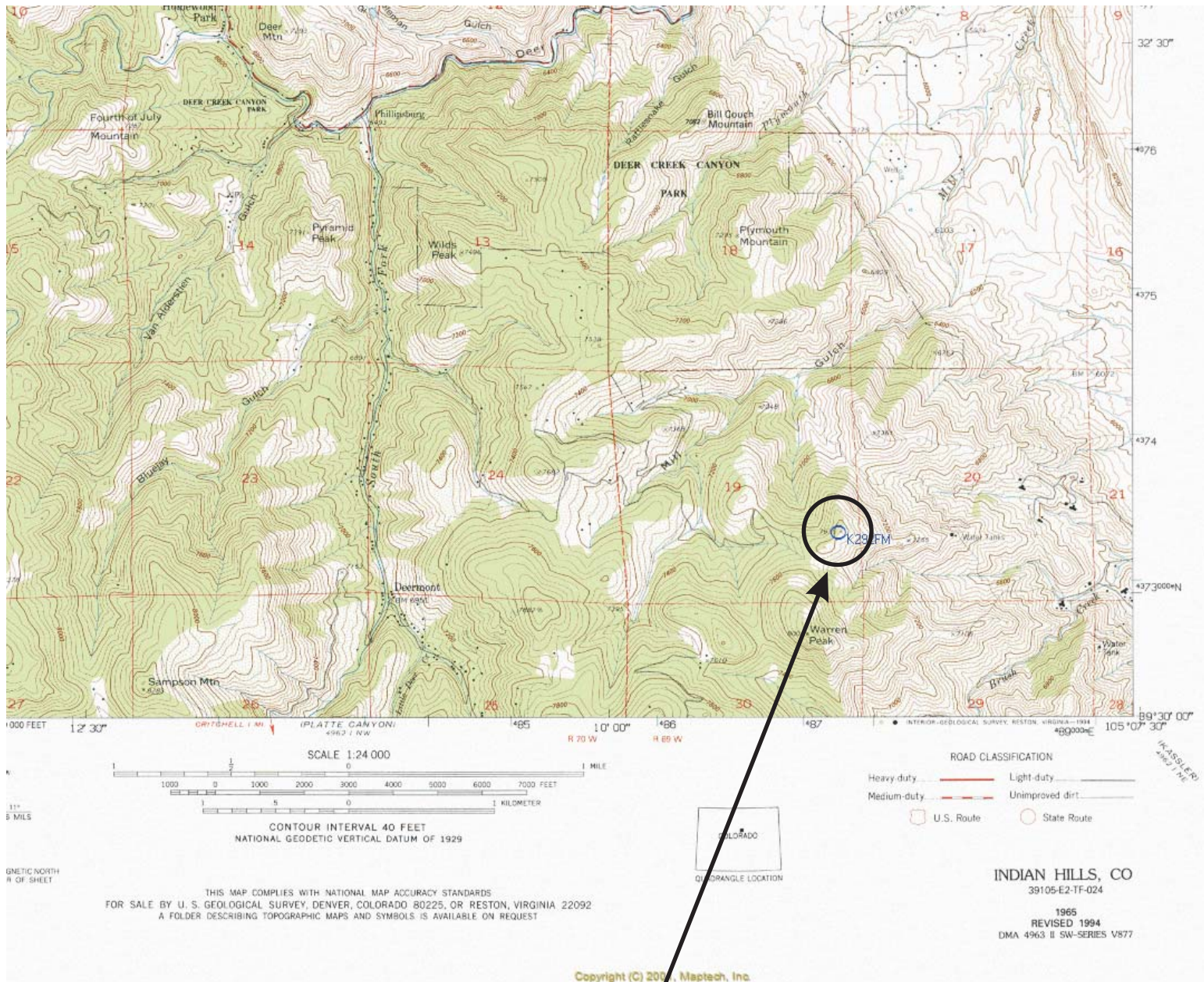


EXHIBIT 12b

Demonstration of No Population in 100 dBu Interference Contour



100 dBu
Interference Contour
Uninhabited/Unpopulated