

**JCE Licenses L.L.C.
KCKN Roswell , New Mexico
1020 kHz 50 / 50 kW DA2**

Engineering Exhibit EE

In support of
Application for Minor Change of Daytime Antenna System

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Technical Narrative

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General.

This exhibit supports the attached FCC form 301 application of JCE Licenses LLC (hereinafter JCE) for minor change of KCKN's daytime antenna system. KCKN currently operates as a 50 kW daytime / 50 kW nighttime radio station serving Roswell, NM. with a 6 tower stagger-ed parallel (nighttime) directional antenna system. Three of these 6 radiators are currently used for KCKN's 50 kW daytime antenna system. JCE proposes **no physical change** to the existing 6 tower array or site.

Proposed Modification

Although KCKN easily serves its local community with adequate signal strength, JCE believes it may serve outlying areas better with a simple change of electrical parameters. The proposed change would increase field intensity significantly to these desired areas without any increase to existing interference. Answers to all applicable questions contained in FCC form 301 (section III AM Engineering) are contained in exhibit EE as described in the following sub sections.

Exhibit EE1 serves to update location data currently on file. Exhibit EE1A is the most recent boundary survey of the transmitter site. Exhibit EE2 is an aerial photograph of the transmitter site along with the maximum radiation azimuth's of the proposed daytime array. Exhibit EE3 is a description of the proposed directional antenna system. Exhibit EE3A is a standard pattern polar plot of the proposed directional antenna systems 1 km fields. Exhibit EE4 and its associated sub exhibits, comprise the complete groundwave allocation and interference study.

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73.37 Waiver Request

KCKN was originally licensed prior to the 1992 "AM Improvement Factors" docket. As such, it is noted that KCKN both causes and receives first adjacent channel interference as defined by the post 92 rules (Reference EE 4B). JCE proposes complete elimination of the caused interference area, and greatly reduced received interference area. Special exhibit EE4C demonstrates the above. It is noted that the existing caused interference area is 730 square kilometers. The JCE proposal completely eliminates the interference caused to KT NZ.

In addition, the JCE proposal significantly reduces the received interference area to KCKN. We note the existing interference area is comprised of 1423 square kilometers. Although the JCE proposal creates a new interference area, it greatly reduces the total interference area. We note the JCE proposal reduces the total interference area from 1423 to 1176 square kilometers. When analyzed in detail (exhibit EE 4C.), it is noted that the JCE proposal reduces caused interference area by -100%, and received interference area by -21%. JCE believes that its proposals attributes are more than enough basis and purpose for waiver. JCE prays the Commission for acceptance and waiver in accordance with the provisions set forth in 73.37(a)(1). Implementation of the JCE proposal will greatly reduce existing interference areas.

Summary

This proposal appears to easily comply with 72.24(g) with regard to population. Because there will essentially be no change to the existing site, the applicant believes its proposal will not significantly effect the environment since it does not meet any of the criteria specified in Section 1.1307 of the rules. The existing structures have a fence distance that easily complies within the minimum recommendations for compliance with ANSI RF radiation exposure limits contained in the Office of Engineering and Technology Bulletin 65A, for the electrical height's and power level of this proposal.

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The applicant agrees to reduce power or turn the transmitter off, as appropriate at any time any authorized person is working within four meters of the tower's for any purpose other than making readings or adjustments of brief duration. There are no known non-broadcast or government receiving stations in the vicinity of the proposed transmitter site that are likely to receive interference as a result of the implementation of this application. If any interference should occur, the applicant will correct the problem in accordance with current FCC rules and regulations. If any blanketing interference is reported as a result of this application, the applicant will discharge its responsibilities in correcting it in accordance with 73. 88.

The undersigned believes that, other than the requested waiver, this proposal is in full compliance with all applicable FCC rules and regulations and grant of the construction permit shall be in the best interest of the public.


Ralph Ray Barnes