

## Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

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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.

Channel Study																			
Proposed 292 Denver																			
REFERENCE	CH#	292D	-	106.3	MHz,	Pwr=	0.01	kW,	HAAT=	0.0	M,	COR=	2156	M	DISPLAY DATES				
39 23 18 N						Average Protected F(50-50)=	3.15	km							DATA 07-12-03				
105 01 54 W						Ave. F(50-10)	40	dBu=	10.2	54	dBu=	4.4	80	dBu=	1.6	100	dBu=	.2	SEARCH 07-13-03
CH	CALL	TYPE	STATE	AZI.	DI ST	LAT.	Pwr (kW)	COR(M)	PRO (km)	*IN*	*OUT*								
CITY				<--	FILE #	LNG.	HAAT (M)	INT (km)	LICENSEE	(Overlap	in km)								
292D Denver	AP292	APP CO	DE	254.8 74.8	1.41 BNPFT20030312ALR	39 23 06 105 02 51	0.000 490	2352 2.1	0.0 Educational	0.48<	-0.68<								
294C Denver	KBPI . A	APP CO	CY	335.5 155.5	42.06 BPH20030424AAP	39 43 58 105 14 08	100.000 391	2292 0.2	79.1 Jacor Broadcasting Of Colo	21.03	-37.20*<								
290C Denver	KALC. A	APP CO	CY	335.5 155.5	42.06 BMPH20020927AAT	39 43 58 105 14 08	100.000 391	2292 0.2	79.1 Entercom Denver License, L	21.03	-37.20*<								
290C Denver	KALC. C	CP CO	DC	335.5 155.5	42.06 BPH20020409AAF	39 43 58 105 14 08	100.000 384	2285 0.2	78.6 Entercom Denver License, L	21.11	-36.68*<								
294C Denver	KBPI . A	APP CO	CY	335.5 155.5	42.06 BPH20030424AAP	39 43 58 105 14 08	100.000 391	2292 0.2	79.1 Jacor Broadcasting Of Colo	21.03	-37.20*<								
290C Denver	KALC	LIC CO	DCY	335.4 155.4	42.13 BMLH19860130KC	39 43 59 105 14 12	100.000 394	2293 0.2	79.3 Entercom Denver License, L	21.16	-37.35*<								
294C Denver	KBPI	LIC CO	CN	335.4 155.4	42.13 BLH19851120KC	39 43 59 105 14 12	100.000 417	2316 0.2	81.0 Jacor Broadcasting Of Colo	20.87	-39.06*<								
292C2 Wi defi el d	KKLI	LIC CO	CN	168.4 348.4	72.93 BLH19901205KE	38 44 41 104 51 46	1.600 882	2933 11.1	57.8 Capstar Tx Limited Partner	-64.73<	4.00								
292D Engl ewood	AP292	APP CO	DE	325.8 145.8	50.83 BNPFT20030312AGP	39 45 57 105 21 59	0.005 276	2509 24.5	8.0 Educational	16.59	18.34								
292D Val mont	AP292	APP CO	C	339.1 159.1	62.44 BNPFT20030310BEW	39 54 48 105 17 33	0.010 599	2545 34.5	13.7 Way-fm Medi a Group, Inc.	1.99	14.30								
292D Westmi nster	AP292	APP CO	C	0.2 180.2	64.95 BNPFT20030317HFR	39 58 24 105 01 44	0.140 37	1674 37.8	6.7 Radio Assist Ministry Inc.	31.25	20.44								
292D Boul der	AP292	APP CO	C	344.9 164.9	66.34 BNPFT20030317EME	39 57 53 105 14 07	0.099 -95	1699 36.3	5.6 Educational	37.23	24.45								
292D Longmont	AP292	APP CO	DE	358.7 178.7	94.58 BNPFT20030312ACU	40 14 24 105 03 23	0.000 121	1637 37.5	0.0 Educational	83.54	57.11								
292D KRKM F1 Granby		CP CO	DC	313.4 133.4	106.08 BNPFTB20001120AA	40 02 24 105 56 11	0.006 -98	2534 15.1	2.8 Grand County Wi reless, Inc	92.52	88.21								
292D Leadvi lle	AP292	APP CO	C	262.1 82.1	110.64 BNPFT20030317LUE	39 14 39 106 18 04	0.115 -577	3056 1.9	5.8 Lake County Tv-fm, Inc.	90.52	102.86								
292C3 KRKM Kremml ing		LIC CO	NC	299.9 119.9	139.53 BLH20000310ACM	40 00 18 106 26 57	2.350 414	2851 4.3	43.6 Grand County Wi reless, Inc	26.88	91.63								
292D Greel ey	AP292	APP CO	DE	12.8 192.8	113.98 BNPFT20030312AXA	40 23 19 104 43 56	0.001 87	1528 38.1	2.9 Educational	93.15	72.94								
292D Greel ey	AP292	APP CO	C	14.1 194.1	116.01 BNPFT20030317BNS	40 24 04 104 41 54	0.250 64	1500 38.0	10.5 Educational	69.53	67.52								
292C3 KPRB. A Brush		APP CO	NCX	50.6 230.6	146.81 BPH20020926ACP	40 13 02 103 41 46	15.000 53	1401 27.4	26.2 Jms Broadcasting, LI c	44.67	93.15								
292D Estes Park	AP292	APP CO	C	343.1 163.1	119.88 BNPFT20030313BES	40 25 13 105 26 39	0.010 266	2743 35.8	9.5 Educational	77.80	74.53								
292D Ft. Coll ins	AP292	APP CO	DE	354.1 174.1	123.35 BNPFT20030312ADN	40 29 36 105 10 52	0.000 481	2078 36.6	0.0 Educational	112.55	86.75								
292D Buena Vi sta TRANSLATOR FOR KVRH-FM,	DK292A	LIC CO	CN	235.5 55.5	125.66 BLFT102	38 44 37 106 13 30	0.053 804	3324 3.1	25.5 Chaffee County Tv Translat	43.51	97.01								
292A Brush	KPRB	LIC CO	C	50.6 230.6	146.81 BLH20010808ABF	40 13 02 103 41 46	3.000 53	1401 27.4	17.9 Jms Broadcasting, LI c	73.68	101.51								
292C3 KPRB. A Brush		APP CO	CX	55.8 235.8	157.89 BPH20020926ACP	40 10 33 103 29 49	25.000 93	1430 26.1	37.9 Jms Broadcasting, LI c	37.84	93.93								
292C3 KPRB. A Brush		APP CO	CX	55.8 235.8	157.89 BPH20020926ACP	40 10 33 103 29 49	25.000 93	1430 26.1	37.9 Jms Broadcasting, LI c	37.84	93.93								

Page # 2

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
290D Colorado Springs	AP290	APP DE CO	168.3 348.3	72.90 BNPFT20030312AJY	38 44 43 104 51 39	0.000 683	2718 0.1	0.0 Educational	69.71 Communications	72.85
294D Colorado Springs	AP294	APP DE CO	168.3 348.3	72.90 BNPFT20030312AJZ	38 44 43 104 51 39	0.010 683	2718 0.1	14.6 Educational	69.49 Communications	58.23

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\*\*\*Affixed to 'IN' or 'Out' values = site inside protected contour.  
ERP and HAAT are on direct line to and from reference station. "<" = Contour Overlap

Terrain and Contour Study

N. Lat. = 39 23 18 W. Lng. = 105 01 54

HAAT and Distance to Contour - FCC Method - 03 Arc. Sec.

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	54-F1	40-F1	100-F1
000	1775.6	380.4	0.0096	-20.17	0.981	11.21	16.12	38.21	0.22
030	1821.8	334.2	0.0083	-20.81	0.911	10.15	14.31	34.08	0.20
060	1867.4	288.6	0.0030	-25.16	0.552	7.09	10.44	24.54	0.12
090	1887.4	268.6	0.0000	-47.23	0.043	0.96	1.75	5.92	0.01
120	1924.1	231.9	0.0000	-48.43	0.038	0.84	1.50	5.10	0.01
150	1927.7	228.3	0.0002	-36.59	0.148	2.69	4.32	10.75	0.03
180	2234.2	-78.2	0.0006	-32.01	0.251	1.60	2.29	5.00	0.06
210	2461.8	-305.8	0.0005	-32.74	0.231	1.52	2.20	4.79	0.05
240	2223.5	-67.5	0.0000	-44.00	0.063	1.40	1.61	2.54	0.01
270	2204.0	-48.0	0.0000	-49.95	0.032	0.71	1.41	1.82	0.01
300	2178.6	-22.6	0.0004	-33.68	0.207	1.61	2.08	4.51	0.05
330	1834.3	321.7	0.0053	-22.78	0.726	8.79	12.59	29.60	0.16

Ave El= 2028.37 M HAAT= 127.63 M AMSL= 2156

Channel Study  
Proposed 292 Denver vs KKLI

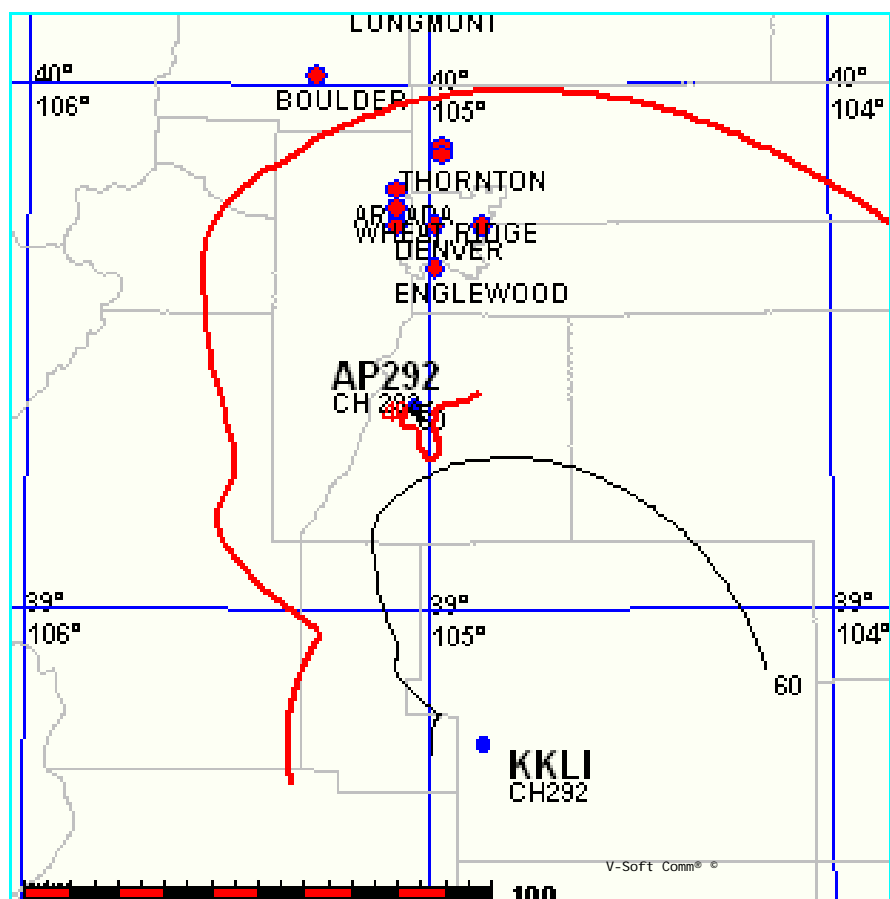
FMCONT Allocation Study

08-29-2003

AP292 CH 292 D  
.01 kW 2156M COR DA  
Prot. = 60 dBu  
Intef. = 40 dBu

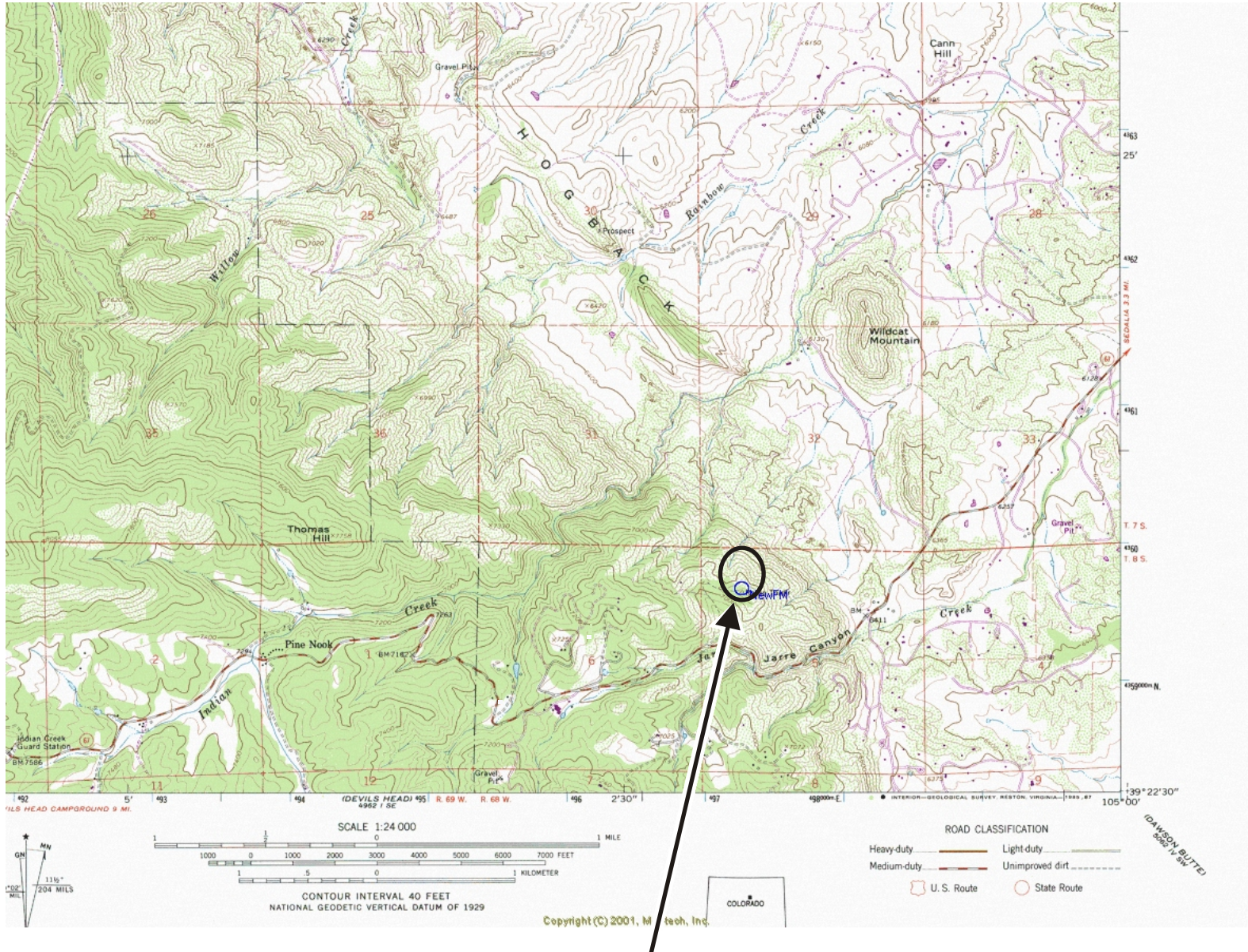
KKLI CH 292 C2  
1.6kW, 2933 M COR  
Prot. = 60 dBu  
Intef. = 40 dBu  
File # BLH19901205KE

1: 1,718,750



## EXHIBIT 12b

### Demonstration of No Population in 100 dBu Interference Contour



100 dBu  
Interference Contour  
Uninhabited/Unpopulated