

Allocation Study

Below is a listing of the exhibits for the many factors that were taken into consideration in this study.

- Exhibit 15A –provides an overview of all nearby allocations.
- Exhibit 15A-1 – shows the relationship between the proposed facility and KOCU.
- Exhibit 15A-2 – shows the relationship between the proposed facility and KOCU.C.
- Exhibit 15A-3 – shows the relationship between the proposed facility and KVRK.
- Exhibit 15B – a request for a waiver of 47 C.F.R. 73.509 in regard to interference received.
- Exhibit 15B1-4 – shows the relationship between the proposed facility and those facilities for which the above waiver has been requested.

Educational Media Foundation

Exhibit 15A

5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Grandfield, OK

REFERENCE		CH# 210C1- 89.9 MHz, Pwr= 45 kW, HAAT=152.0M, COR= 453 M								DISPLAY DATES	
34 16 19 N		Average Protected F(50-50)= 51.5 km								DATA 07-28-04	
98 25 30 W		Ave. F(50-10) 40 dBu= 135.7 54 dBu= 76.9 80 dBu= 19.5 100 dBu= 5.8								SEARCH 07-30-04	
CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap	*OUT* in km)	
210C3 Grandfield	KWKL	LIC OK	VX OK	0.0 180.0	0.00 BLED20040217ADJ	34 16 19 98 25 30	11 158	453 105.6	50.3 Educational Media Foundati	-155.84 -174.36*	
211A Altus	KOCU.C	CP OK	CN OK	298.2 118.2	94.74 BPED19990723MB	34 40 14 99 20 13	1 45	449 18.1	49.7 Cameron University	26.88 7.47	
211A Altus	KOCU	LIC OK	CX OK	298.2 118.2	94.74 BLED20020626AAU	34 40 14 99 20 13	5 44	448 27.1	49.7 Cameron University	17.88 1.36	
212A Lawton	KVRS	LIC OK	V OK	346.4 166.4	40.36 BLED19990907AAK	34 37 32 98 31 43	1 84	434 1.5	51.0 American Family Associatio	-12.14 17.79	
208C3 Wichita Falls	KMOC	LIC TX	CN TX	194.3 14.3	42.46 BLED19870720KA	33 54 04 98 32 21	3 199	506 2.9	51.5 Christian Service Foundati	-11.88 3.51	
207A Lawton	KCCU	LIC OK	EN OK	19.8 199.8	41.53 BLED19890731KB	34 37 26 98 16 15	2 147	486 2.3	50.0 Cameron University	-10.71 9.73	
213C3 Wichita Falls	KTEO	LIC TX	CN TX	194.6 14.6	42.96 BLED19930823KH	33 53 50 98 32 33	7 123	430 3.1	51.4 Cornerstone University	-11.57 4.86	
210A Ada	KTGS	LIC OK	C OK	70.1 250.1	168.32 BLED19990111KA	34 46 31 96 41 44	0.3 62	369 36.6	52.0 S Central Ok Christian Bro	79.79 21.42	
209C1 Sanger	KVRK	LIC TX	C TX	119.9 299.9	156.84 BLED19990811KC	33 33 36 96 57 35	14 501	738 97.3	53.8 Research Educational Found	5.73 11.46	
211C1 Edmond	KCSC	LIC OK	CN OK	30.4 210.4	167.96 BLED19980428KC	35 34 24 97 29 08	100 250	605 100.2	50.4 The University Of Central	17.39 24.01	
213A Chickasha	970203	APP OK	CN OK	26.3 206.3	91.58 BPED19970203MA	35 00 37 97 58 41	1 64	432 1.6	50.1 American Family Associatio	39.82 71.31	
213A Chickasha	970807	APP OK	CN OK	28.4 208.4	93.57 BPED19970807MY	35 00 43 97 56 07	1.3 85	439 1.7	50.3 Sister Sherry Lynn Foundat	41.61 69.69	
211C0 Dallas	KERA	LIC TX	CX TX	143.6 323.6	232.39 BLED20031103ACS	32 34 43 96 57 12	100 413	582 119.8	53.2 North Texas Public Broadca	59.40 72.78	
212C3 Ardmore	KLCU	LIC OK	CN OK	93.4 273.4	117.41 BLED19980519KA	34 12 10 97 09 12	25 46	323 2.8	52.4 Cameron University	62.18 83.95	
208C1 Carnegie	KJCC	CP OK	DCN OK	6.0 186.0	126.99 BNPED20000214AAM	35 24 37 98 16 43	15.61 166	600 4.5	50.1 Csn International	72.31 77.50	
210C Amarillo	KACVFM	LIC TX	CN TX	292.0 112.0	332.80 BLED19900208KD	35 20 33 101 49 21	100 317	1384 173.9	50.4 Amarillo Junior College Di	108.49 124.61	
213A Weatherford	KAYM.C	CP OK	CX OK	348.3 168.3	138.78 BPED20011231ABD	35 29 47 98 44 10	2.7 103	590 2.2	51.1 American Family Associatio	85.45 109.00	
213A Weatherford	KAYM	LIC OK	C OK	348.3 168.3	138.78 BLED20000210ABT	35 29 47 98 44 11	1 103	590 1.6	51.1 American Family Associatio	86.05 114.12	
207A Norman	950714	APP OK	CN OK	41.1 221.1	140.15 BPED19950714MD	35 13 04 97 24 37	4.5 46	396 1.9	50.7 Sister Sherry Lynn Foundat	87.55 116.11	
207A Norman	941026	APP OK	CN OK	41.6 221.6	143.43 BPED19941026MA	35 13 57 97 22 35	1 101	445 1.6	50.8 American Family Associatio	91.05 118.99	
209C0 Ponca City	KJTH.C	CP OK	CN OK	16.3 196.3	268.96 BPED19960307MD	36 35 41 97 34 37	100 302	626 105.2	50.1 The Love Station, Inc,	113.60 121.08	
209C2 Abilene	KACU	LIC TX	CN TX	211.1 31.1	232.13 BLED19860616KA	32 28 34 99 42 22	33 80	596 59.7	50.9 Abilene Christian Universi	121.53 118.21	
208C3 Weatherford	KYQX.C	CP TX	CX TX	169.4 349.4	160.27 BMPED20040123ACH	32 51 05 98 06 31	4.5 133	455 2.8	53.2 Cssi Non-profit Educationa	104.29 124.16	

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap	*OUT* in km)
263A Newcastle	RADD	ADD TX	193.1 13.1	119.83	33 13 10 98 43 01	6 975	1336 87.8	51.5 Charles Crawford	22.0R	97.8M
209C3 Stephenville	KEQX.C	CP DVX TX	170.0 350.0	241.88 BMPED20040427AAJ	32 07 24 97 58 48	2.493 166	500 43.7	53.2 Cssi Non-profit Educationa	144.97	134.04
208A Weatherford	KYQX	LIC CN TX	161.0 341.0	178.28 BLED19860107KE	32 45 06 97 48 06	0.37 28	376 1.3	53.1 Cssi Non-profit Educationa	123.80	164.36
210C2 Temple	KBDE	LIC DV TX	163.1 343.1	347.76 BLED19991008ABH	31 16 05 97 21 34	11.5 135	361 103.1	53.2 American Family Associatio	191.53	172.68
264C Highland Village	KWRDFM	LIC NCX TX	118.7 298.7	168.49 BLH20020822AAL	33 32 08 96 49 54	98 607	821 114.7	53.7 Inspiration Media Of Texas	41.0R	127.5M
263C Oklahoma City	RDEL	DEL OK	30.1 210.1	169.56	35 35 22 97 29 03	100 356	711 91.4	50.4 Charles Crawford	41.0R	128.6M
263C Oklahoma City	KATTFM	LIC CY OK	30.1 210.1	169.56 BLH19841105DA	35 35 22 97 29 03	100 356	711 91.4	50.4 Citadel Broadcasting Compa	41.0R	128.6M
263C0 Oklahoma City	RADD	ADD OK	30.1 210.1	169.56	35 35 22 97 29 03	100 356	711 91.4	50.4 Charles Crawford	37.0R	132.6M
213C3 Wheeler	KPDR	LIC CN TX	307.9 127.9	212.62 BLED19930125KC	35 25 57 100 16 31	10 160	892 3.9	49.1 Top O' Texas Educational B	159.67	167.70
207A Langston	KALU	LIC C OK	29.4 209.4	213.74 BLED19951003KA	35 56 36 97 15 32	0.15 38	364 0.9	50.3 Langston University	162.53	201.13
213C3 Stephenville	980909	APP DCN TX	176.6 356.6	217.44 BPED19980909MW	32 18 53 98 17 21	13.888 80	481 3.1	52.3 Broadcasting For The Chall	162.02	180.68
210A San Saba	VA210	VAC N TX	184.7 4.7	342.39	31 11 40 98 43 08	6 999	1384 160.3	52.0	130.15	132.32
213C2 Stephenville	980730	APP DCN TX	170.3 350.3	224.59 BPED19980730ME	32 16 31 98 01 22	2.998 400	706 3.4	53.2 The North Texas Music Poun	168.05	173.45
207A Stuart	KLRB	LIC VX OK	70.5 250.5	221.80 BLED20021010AAW	34 54 57 96 08 10	3 83	336 2.1	52.0 Lighthouse Of Prayer, Inc.	167.71	193.77
207C1 Dallas	KNON	LIC DCN TX	143.8 323.8	230.31 BLED19900309KA	32 35 24 96 58 21	4.78 284	449 3.7	53.2 Agape Broadcasting Foundat	173.40	181.65
213C3 Bluff Dale	980122	APP CN TX	171.1 351.1	226.47 BPED19980122MC	32 15 16 98 02 59	9.9 139	452 3.6	53.1 Provident Educational Broa	169.70	183.59
211C1 Lubbock	KAMY.C	CP CX TX	255.9 75.9	330.13 BPED20021220AAP	33 30 08 101 52 20	63 176	1128 84.9	50.8 Family Life Broadcasting,	194.40	196.74
264C2 Reydon	AL264	VAC OK	313.5 133.5	181.47 RM10255	35 23 11 99 52 38	50 113	711 54.3	48.8 Katherine Pyeatt	27.0R	154.5M
213C3 Abilene	KAGTFM	LIC C TX	212.3 32.3	230.58 BLED20021107ABJ	32 30 37 99 44 28	23 126	624 4.4	51.0 Gospel Radio Network	175.19	182.65
213A Stephenville	980212	APP CN TX	176.0 356.0	231.31 BPED19980212MA	32 11 29 98 15 08	0.5 58	478 1.6	52.5 American Family Associatio	177.27	213.46
06-2C Wichita Falls	KAUZTV	LI HN TX	194.3 14.3	42.46 BLCT1576	33 54 04 98 32 21	100 305	612	0.0 Hoak Media Of Wichita Fall	To Grd B=	-61.50

ERP and HAAT are on direct line to and from reference station.

**Affixed to 'IN' or 'Out' values = site inside protected contour.



Exhibit 15A-1

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KOCU
BLED20020626AAU
Latitude: 34-40-14 N
Longitude: 099-20-13 W
ERP: 5.00 kW
Channel: 211
Frequency: 90.1 MHz
AMSL Height: 448.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

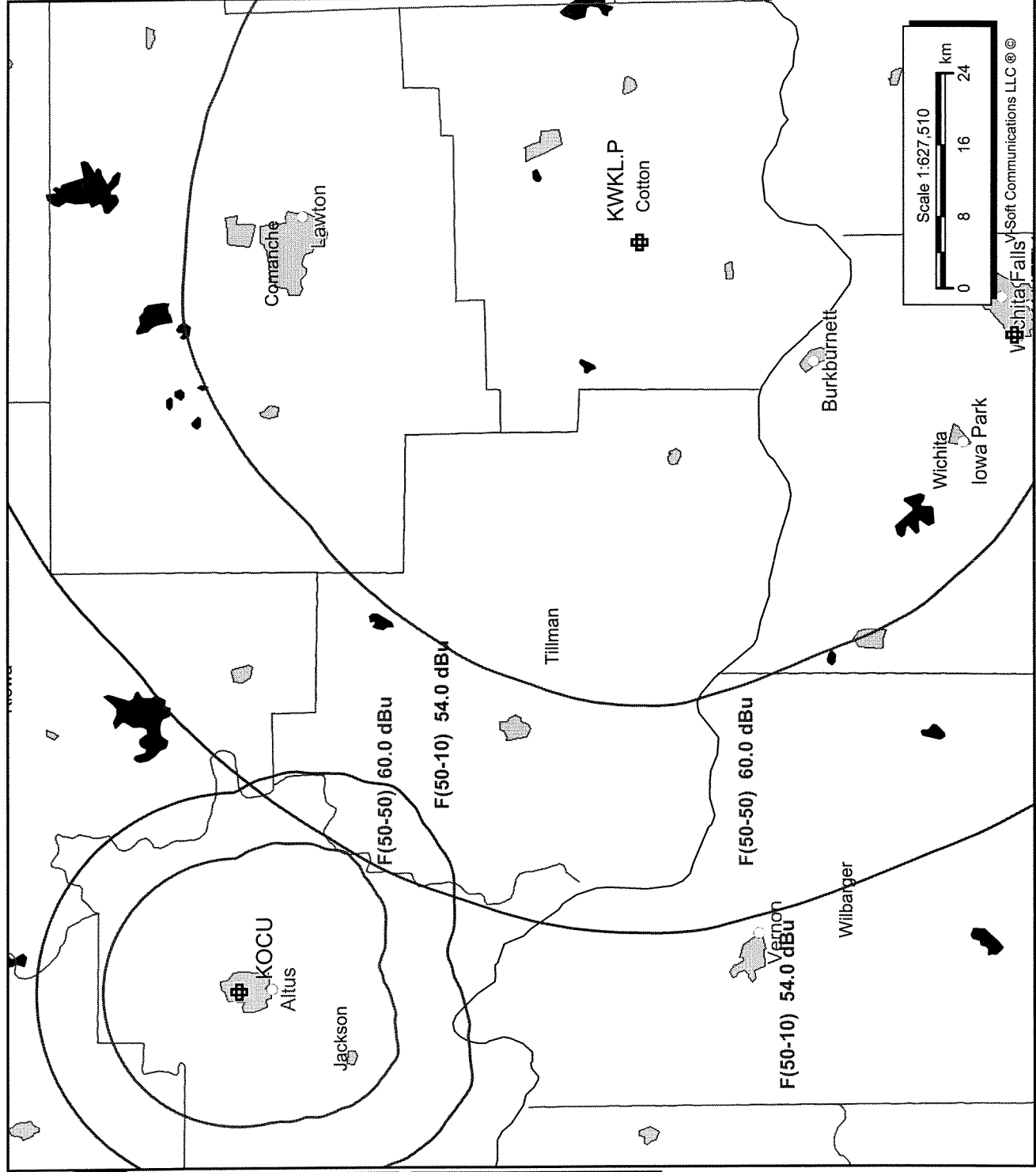




Exhibit 15A-2

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KOCU.C
BPED19990723MB
Latitude: 34-40-14 N
Longitude: 099-20-13 W
ERP: 1.00 kW
Channel: 211
Frequency: 90.1 MHz
AMSL Height: 449.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

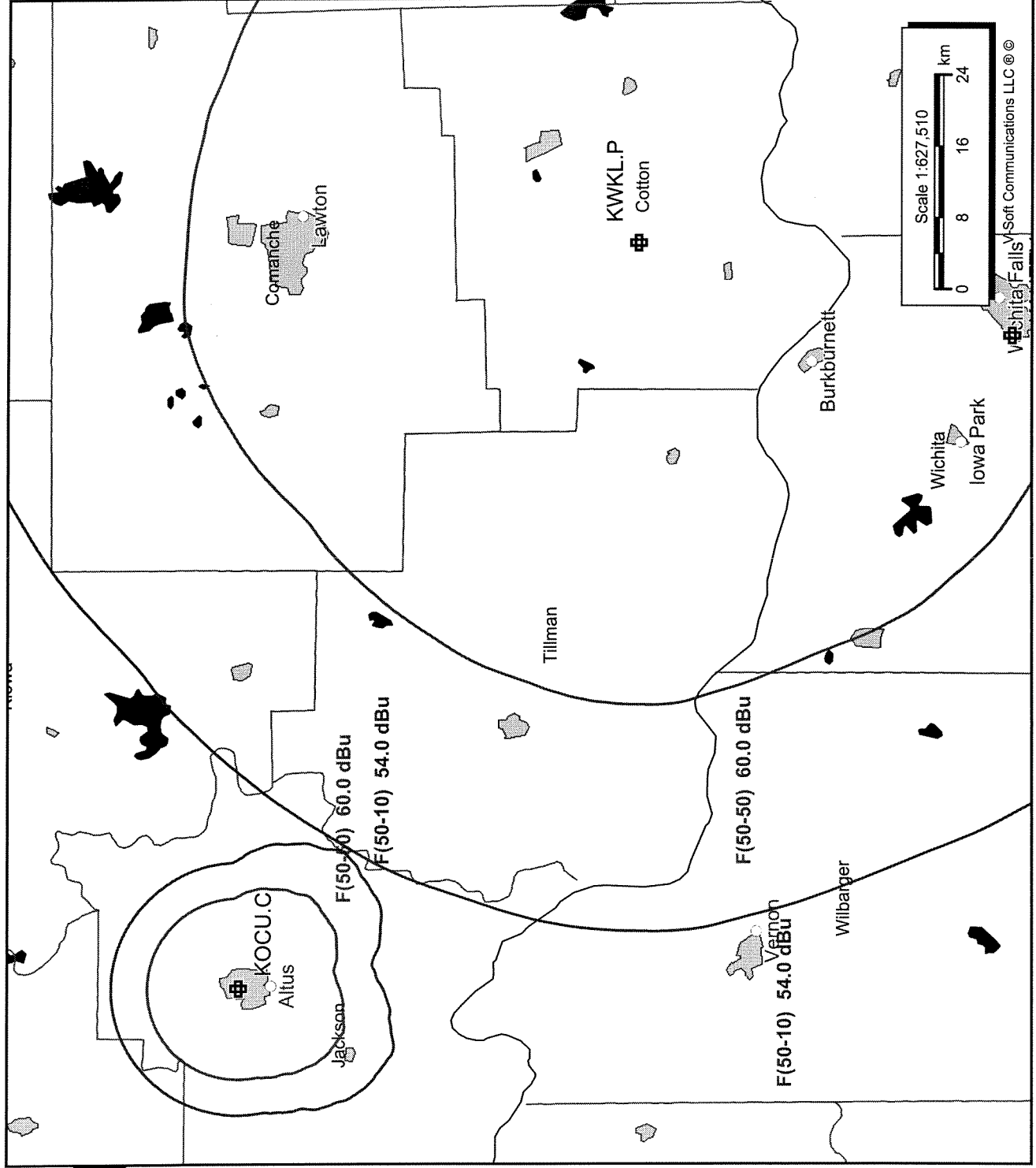
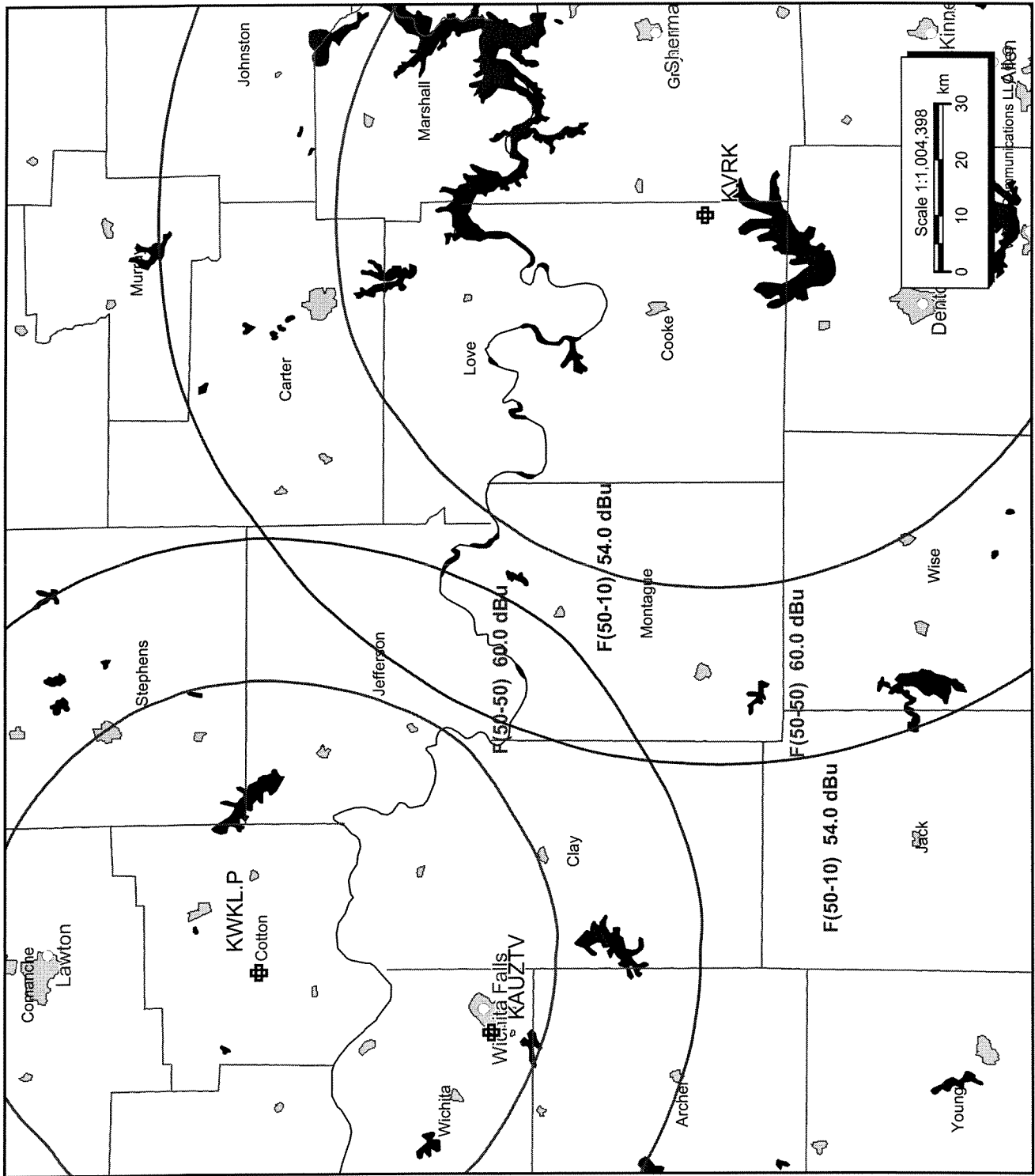




Exhibit 15A-3

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KVRK
BLED19990811KC
Latitude: 33-33-36 N
Longitude: 096-57-35 W
ERP: 14.00 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 738.0 m
Horiz. Pattern: Omni
Vert. Pattern: No



Educational Media Foundation

5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Exhibit 15B

Grandfield, OK

Request for Waiver of 47 C.F.R. Section 73.509

Educational Media Foundation ("EMF") desires to increase the power and service area of station KWKL, Grandfield, Oklahoma. This proposal is engineered so as to NOT CAUSE interference to any existing station, known application or allocation. However, the proposed increased service area would RECEIVE interference from the following second and third adjacent facilities:

Facility ID	Status	Call Sign (or File #)	City of License	Exhibit
36822	Lic	KVRS	Lawton, OK	15B-1
11107	Lic	KMOC	Wichita Falls, TX	15B-2
8484	Lic	KCCU	Lawton, OK	15B-3
55381	Lic	KTEO	Wichita Falls, TX	15B-4

Again, this proposal will not cause interference to the above applications as KWKL's proposed interfering 100 dBu contour will not overlap the applications' protected 60 dBu contour. KWKL's proposed protected contour would, however, receive prohibited overlap from the applications listed above. The area of "overlap received" from the above referenced facilities will be approximately:

Call Sign (or File #)	Square km	Total area of KWKL's proposed 60 dBu
KVRS	8.14	0.10%
KMOC	26.82	0.32%
KCCU	15.72	0.19%
KTEO	32.17	0.39%

The grant of this waiver request will allow KWKL to increase its overall coverage area by 3471.16 square kilometers, an increase of 71.92%. It will provide new service to an estimated 171,599 persons, an increase of 167.87%. This waiver request is nearly identical to the requests made by the licensees of WCPE(FM) and WCCE(FM) in Educational Information Corporation, 6 FCC Rcd 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimus* overlap "received," and WCCE(FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received*.

Significant service will be maintained and enhanced by the proposed expansion of KWKL, and the overlap area is very small and well within the scope of the Commission's waiver policy. Clearly, this benefit heavily outweighs the potential for interference in an area that constitutes 1% (total) of the station's proposed service area. Accordingly EMF respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

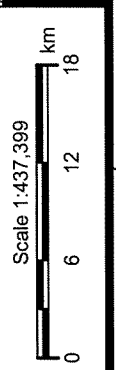
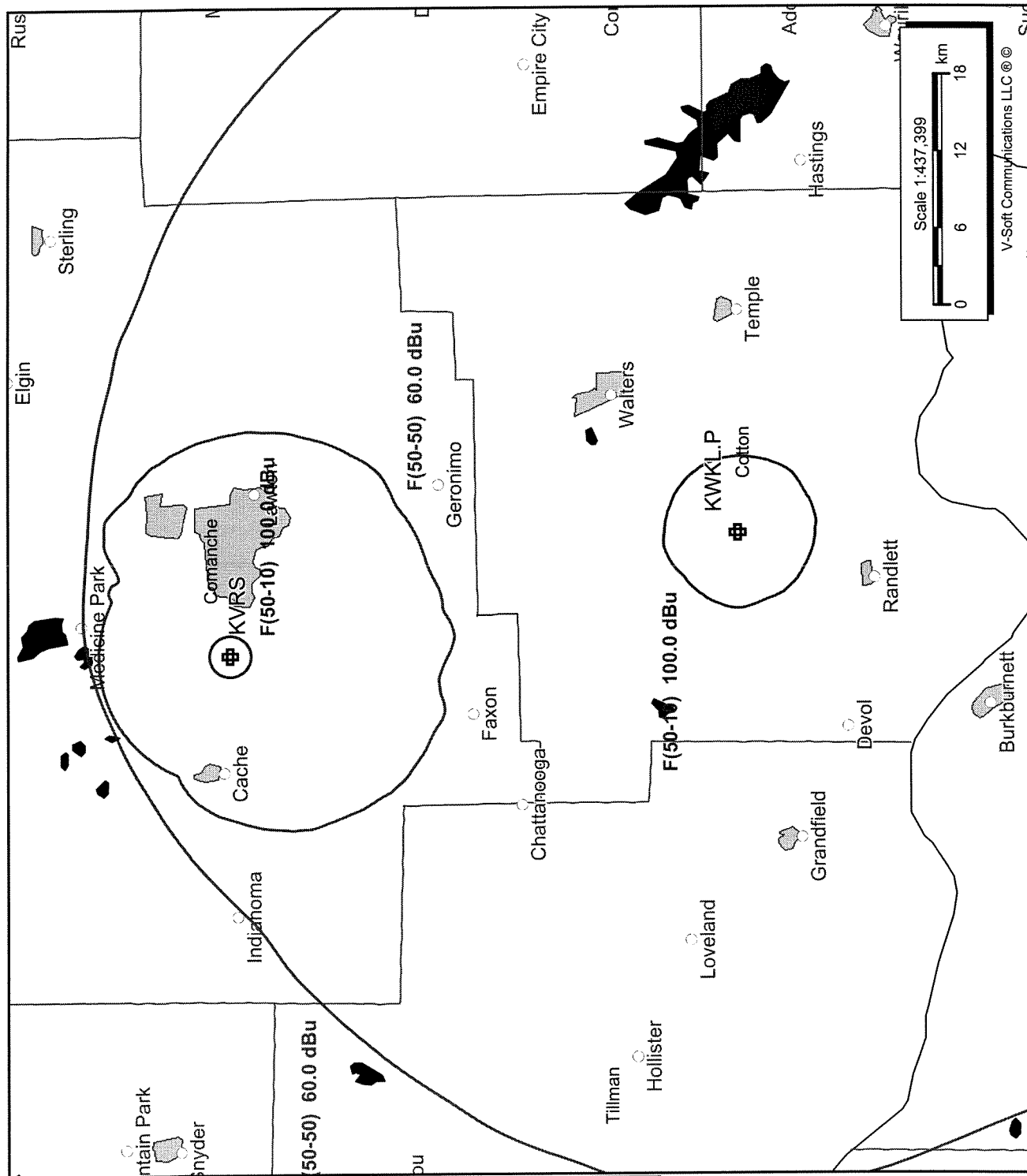
* EMF wishes to emphasize that its request is not at all similar to the second waiver request made by WCPE in Educational Information Corporation, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in that second case.



Exhibit 15B-1

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KVRS
BLED19990907AAK
Latitude: 34-37-32 N
Longitude: 098-31-43 W
ERP: 1.00 kW
Channel: 212
Frequency: 90.3 MHz
AMSL Height: 434.0 m
Horiz. Pattern: Omni
Vert. Pattern: No



V-Soft Communications LLC ©

Exhibit 15B-1

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-10) Cutoff: 100.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KVRS

File Number: BLED19990907AAK

Latitude: 34-37-32 N

Longitude: 098-31-43 W

ERP: 1.00 kW

Channel: 212

Frequency: 90.3 MHz

AMSL Height: 434.0 m

Elevation: 379.0 m

HAAT: 57.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 880

Total Housing Units Within Contour: 294

Total Area Within Contour: 8.14 sq. km



Exhibit 15B-2

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KMOC
BLED19870720KA
Latitude: 33-54-04 N
Longitude: 098-32-21 W
ERP: 3.00 kW
Channel: 208
Frequency: 89.5 MHz
AMSL Height: 506.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

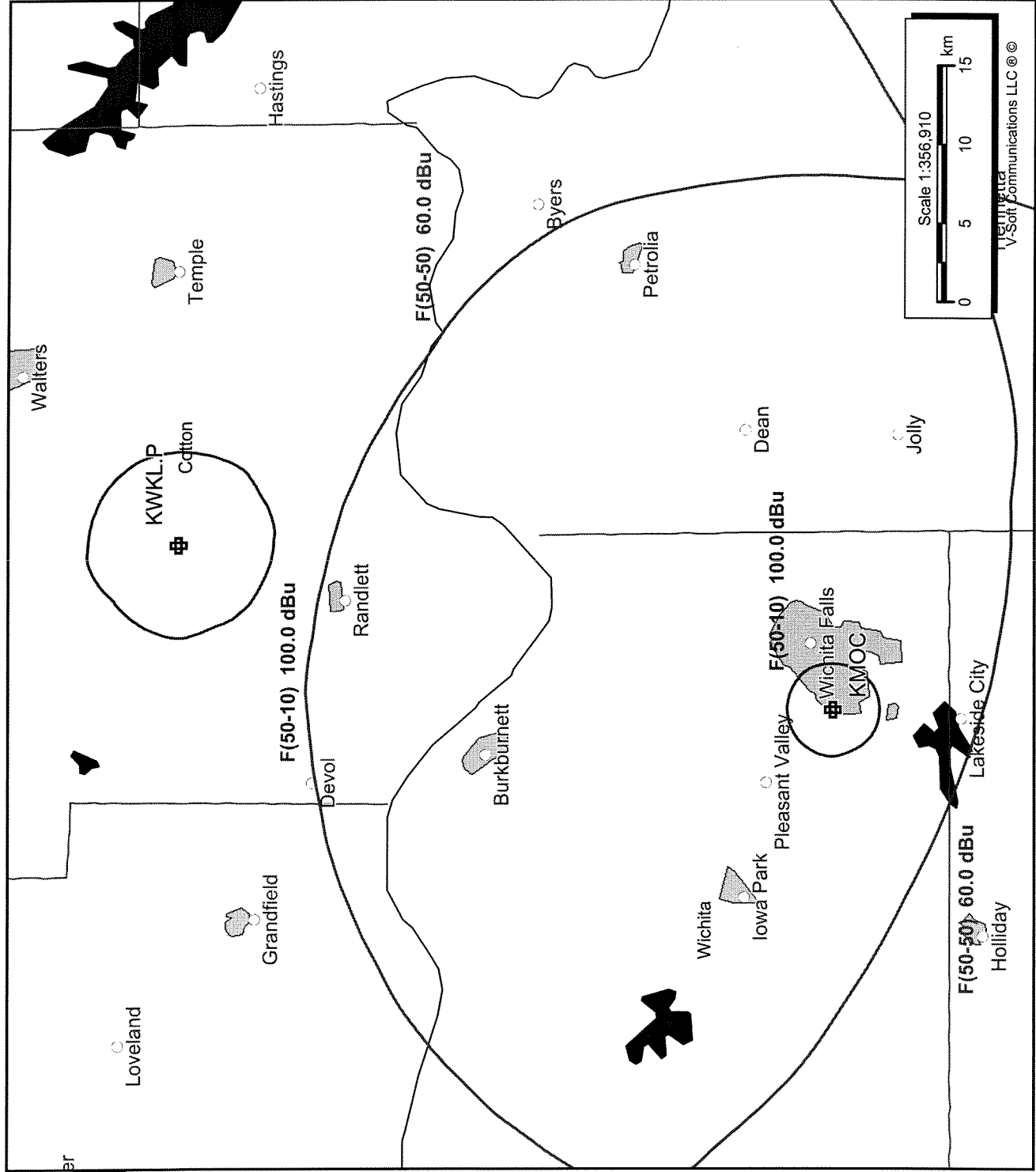


Exhibit 15B-2

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-10) Cutoff: 100.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KMOC

File Number: BLED19870720KA

Latitude: 33-54-04 N

Longitude: 098-32-21 W

ERP: 3.00 kW

Channel: 208

Frequency: 89.5 MHz

AMSL Height: 506.0 m

Elevation: 308.0 m

HAAT: 207.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 21,070

Total Housing Units Within Contour: 9,936

Total Area Within Contour: 26.82 sq. km



Exhibit 15B-3

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KCCU
BLED19890731KB
Latitude: 34-37-26 N
Longitude: 098-16-15 W
ERP: 2.00 kW
Channel: 207
Frequency: 89.3 MHz
AMSL Height: 486.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

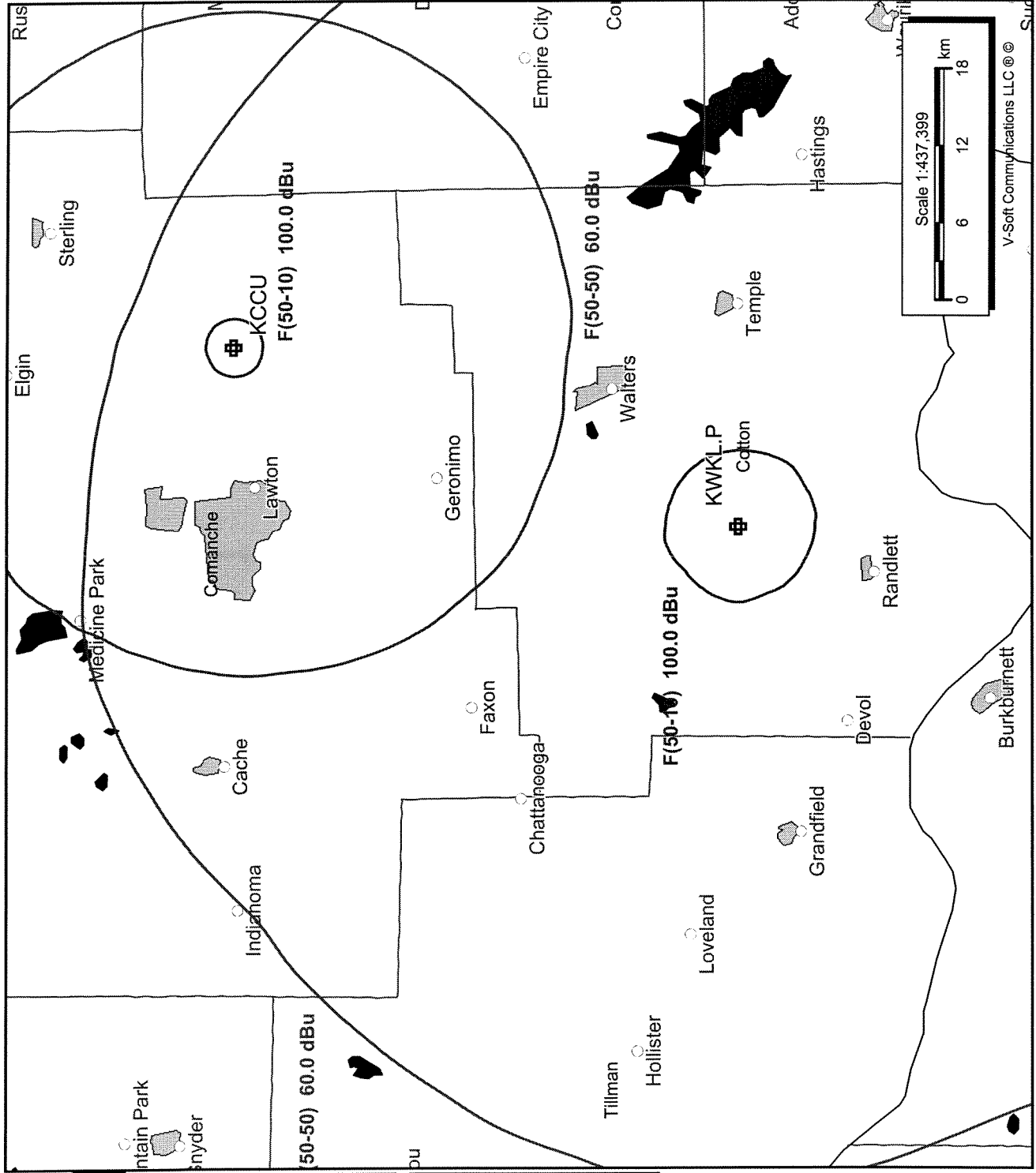


Exhibit 15B-3

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-10) Cutoff: 100.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KCCU

File Number: BLED19890731KB

Latitude: 34-37-26 N

Longitude: 098-16-15 W

ERP: 2.00 kW

Channel: 207

Frequency: 89.3 MHz

AMSL Height: 486.0 m

Elevation: 396.0 m

HAAT: 141.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 45

Total Housing Units Within Contour: 21

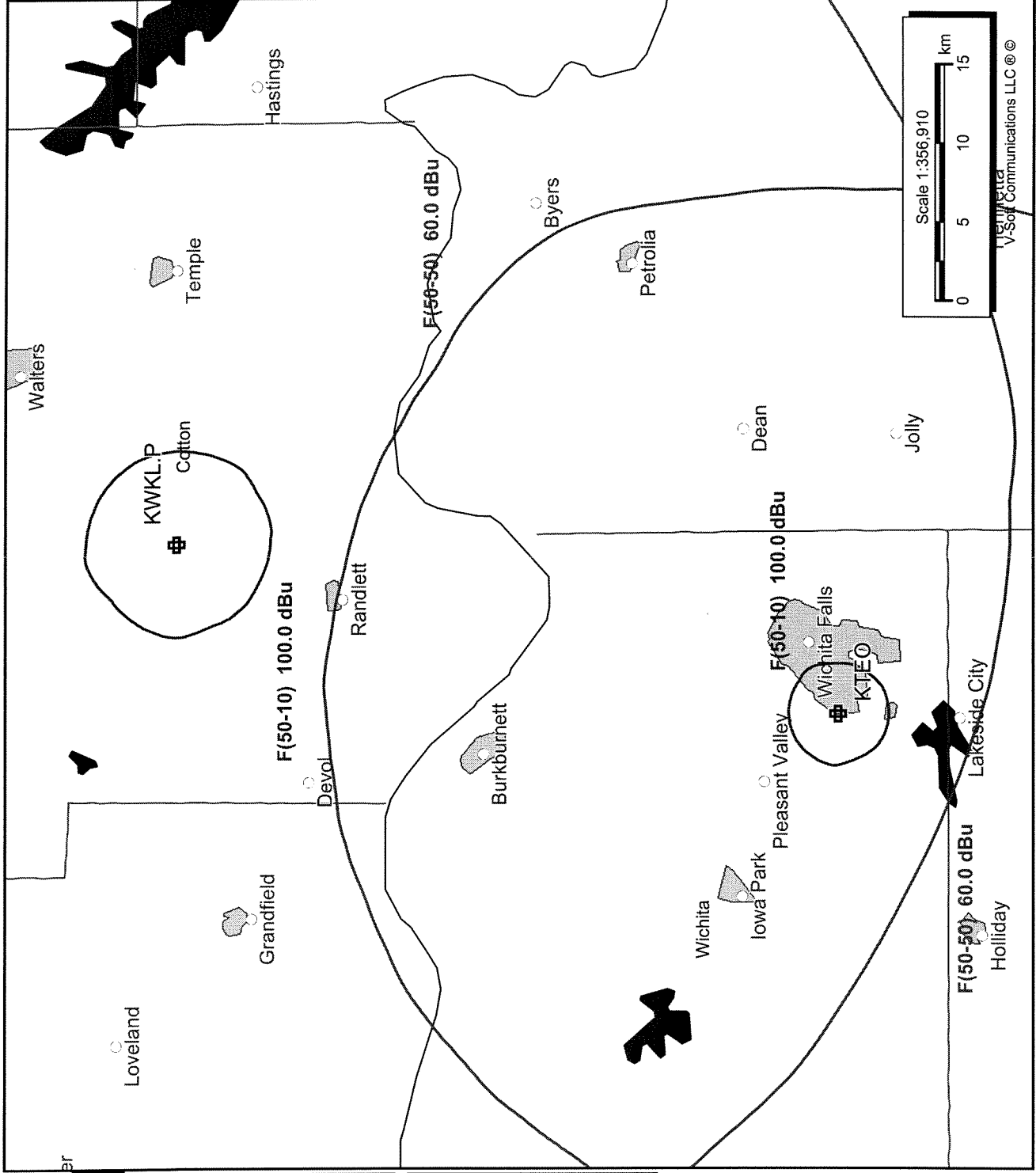
Total Area Within Contour: 15.72 sq. km



Exhibit 15B-4

KWKL.P
BLED20040217ADJ
Latitude: 34-16-19 N
Longitude: 098-25-30 W
ERP: 45.00 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 453.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KTEO
BLED19930823KH
Latitude: 33-53-50 N
Longitude: 098-32-33 W
ERP: 7.00 kW
Channel: 213
Frequency: 90.5 MHz
AMSL Height: 430.0 m
Horiz. Pattern: Omni
Vert. Pattern: No



V-Sort Communications LLC ©

Exhibit 15B-4

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-10) Cutoff: 100.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KTEO

File Number: BLED19930823KH

Latitude: 33-53-50 N

Longitude: 098-32-33 W

ERP: 7.00 kW

Channel: 213

Frequency: 90.5 MHz

AMSL Height: 430.0 m

Elevation: 308.0 m

HAAT: 131.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 24,874

Total Housing Units Within Contour: 11,296

Total Area Within Contour: 32.17 sq. km