

**SELLMEYER ENGINEERING**  
BROADCAST AND COMMUNICATION CONSULTING ENGINEERS  
P.O. Box 356 McKinney, Texas 75070  
MEMBER AFCCE  
(214) 495-9764

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EXHIBIT E-1

TABLE OF CONTENTS  
APPLICATION FOR CONSTRUCTION PERMIT  
GRAHAM NEWSPAPERS, INC.  
RADIO STATION KLXK  
BRECKENRIDGE, TEXAS  
AUGUST, 2002

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- FCC FORM 301
- ENGINEERING STATEMENT
- CERTIFICATION OF ENGINEER
- EXHIBIT E1-1 VERTICAL SKETCH OF ANTENNA SYSTEM
- EXHIBIT E1-2 SPACING STUDY
- EXHIBIT E1-3 MAP SHOWING PROPOSED SITE
- EXHIBIT E1-4 MAP SHOWING SERVICE CONTOURS
- EXHIBIT E1-5 TABULATION OF PROPOSED SERVICE CONTOURS
- EXHIBIT E1-6 TABULATION OF PRESENT SERVICE CONTOURS

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ENGINEERING STATEMENT  
APPLICATION FOR CONSTRUCTION PERMIT  
GRAHAM NEWSPAPERS, INC.  
RADIO STATION KLXK  
BRECKENRIDGE, TEXAS  
AUGUST 28, 2002

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This Firm has been retained by Graham Newspapers, Incorporated , ("GNI"), licensee of Station KLXK, Breckenridge, Texas to prepare this Engineering Statement in support of its application for construction permit. The instant application proposes a minor change in the effective radiated power of Station KLXK.

**SPECIAL CONSIDERATIONS**

Graham Newspapers, Incorporated acquired the license and construction permit file number BPH-19980612IA for Station KLXK from the previous licensee. The proposed site is owned by American Tower Company. Negotiations to utilize the existing site for the authorized facilities were begun in December, 2001 and continued through May, 2002 with no satisfactory outcome. GNI was advised by American Tower Company following a structural study that the tower would not support the proposed antenna system and associated transmission line. In early June, 2002 a search was begun for a suitable site on which to construct suitable facilities. Such a site has been located approximately 1.1 kilometers north of the present site.

A discussion was held with Edward DeLaHunt, Associate Chief of the Aural Services Branch of the Media Bureau regarding the lack of time to construct the proposed facilities. Mr. DeLaHunt advised the undersigned to file a new Form 301 application and request cancellation of construction permit file number BPH-19980612IA upon acceptance of the instant application. Such cancellation is hereby requested.

**PROPOSED TRANSMITTER SITE & ANTENNA SYSTEM**

The proposed transmitter site exceeds the minimum spacings under Section 73.207 of the Rules. The antenna system will be a six element, side mounted antenna employing full wave spacing. A vertical sketch of the proposed tower and antenna system is attached hereto as Exhibit E1-1. The tower is not yet registered, but the FAA has been notified of the proposed construction. An amendment will be filed reporting the registration number upon completion of the registration process.

**COVERAGE CALCULATIONS**

The distances to contours were calculated by a computer program maintained by this Firm which accurately emulates the F(50,50) curves contained in Section 73.333 of the Rules. The height

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above average terrain for the eight standard radials was calculated from a program which uses linear interpolation of the NGDC thirty second terrain database.

The elevation at ground level at the proposed site was taken from the Breckenridge, Texas topographic map, a copy of which is attached as Exhibit E1-3. The center of radiation of the antenna above mean sea level was calculated from the ground level elevations and the center of radiation above ground level.

The proposed facility satisfies all allocation requirements of Section 73.315 of the rules. It will illuminate the entire city limits of Breckenridge, Texas with a signal strength in excess of 3.16 mV/M (70 dBu). The proposed location meets all of the spacing requirements of Section 73.207 of the Rules. Exhibit E1-2 is a spacing study at the proposed transmitter site.

Exhibit E1-4 is a map showing the present and proposed service contours plotted at five degree intervals. Exhibit E1-5 is a tabulation of the distances to the proposed service contours calculated and plotted at five degree intervals. Exhibit E1-6 is a tabulation of the distances to the existing service contours calculated and plotted at five degree intervals.

The main studio location will remain at the present location in downtown Breckenridge, Texas.

Due to the remote location of the transmitting facility, no receiver induced intermodulation problems are expected to occur. Should any such problems be reported, MBC will undertake the necessary remedies in accordance with the Rules of the Commission.

**ANSI RADIATION COMPLIANCE**

The proposed facility will operate with 50 kilowatts effective radiated power from a height above ground level of 141.7 meters. The worst case power density at six feet above ground level is calculated to be 171 uW/Sq. cM. or 17.1 percent of the maximum permissible exposure level for controlled exposure. This is 85.6 percent of the 200 uW/Sq. cM. maximum permissible exposure level for uncontrolled for uncontrolled areas.

The power density was calculated using the "worst case" model of OST Bulletin 65 edition 97-01. It is evident that the proposed facility will be in compliance with Commission Guidelines. During maintenance periods when it is necessary for work to be performed within hazardous areas, the station will reduce power to the extent required or cease operation for the period necessary. The tower base and transmitter building will be fenced to limit access to authorized personnel. Sufficient warning signs will be posted in the area to warn casual visitors to the site of the potential for radiofrequency radiation exposure.

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ENVIRONMENTAL MATTERS

The facility is located on a new tower in rural central Texas. No significant disturbance of the land to construct and maintain the proposed facilities. The site is in an area which is not affected by any of the environmental factors of Section 1.1307 of the Rules.

Upon grant of this application, the applicant is prepared to promptly construct the facilities and place the station in operation.

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CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Graham Newspapers, Inc. to prepare this Engineering Exhibit

I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.



J. S. Sellmeyer, P. E.

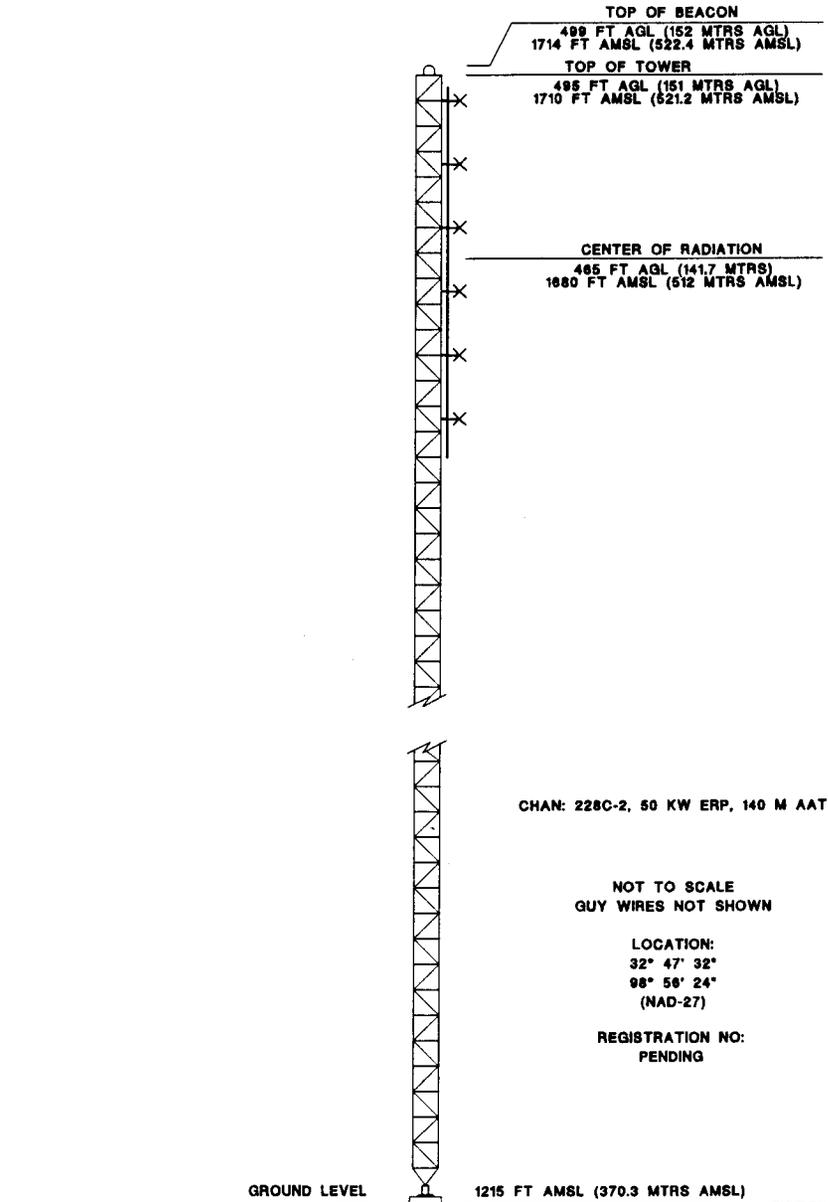
August 28, 2002

P. O. Box 356  
McKinney, Texas 75070  
214-495-9764



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EXHIBIT E1-1  
VERTICAL SKETCH OF PROPOSED ANTENNA SYSTEM  
GRAHAM NEWSPAPERS, INC.  
RADIO STATION KLXK  
CHANNEL 228C-2  
BRECKENRIDGE, TEXAS



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EXHIBIT E1-2  
 GRAHAM NEWSPAPERS, INC.  
 RADIO STATION KLXX  
 CHANNEL 228C-2, XXX MTRS AAT  
 BRECKENRIDGE, TEXAS

FM Study for: KLXX 32-47-32  
 Location: BRECKENRIDGE, TX Channel Class: C2 98-56-24  
 [\*] by HAAT indicates calculated as missing in database.  
 Call City, State Chan Class Freq kW Latitude Dist. Required  
 Status Proponent File Number HAAT Longitude Azm. Clear (km)

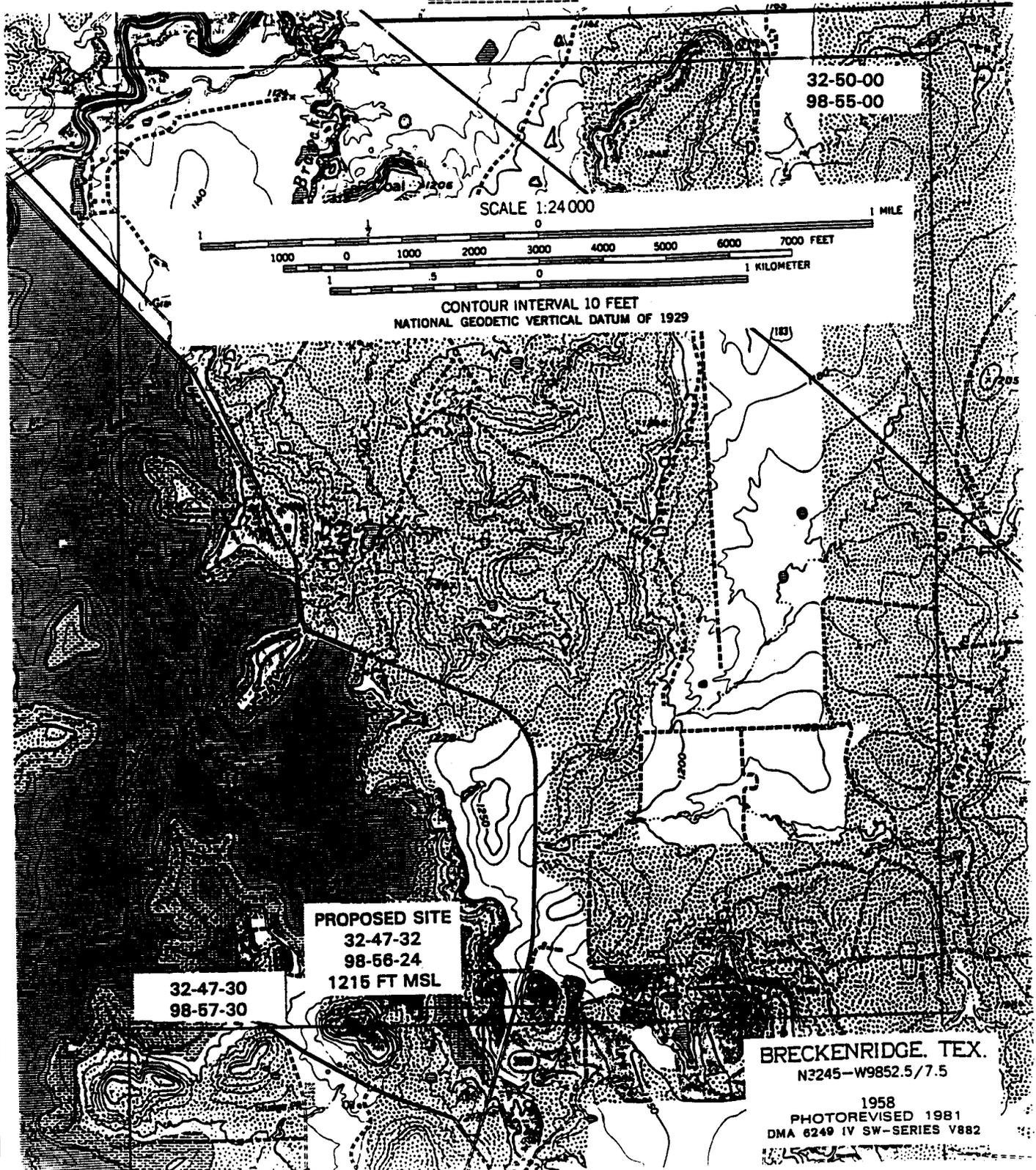
>>>>>> Study For Channel 228 93.5 mHz <<<<<<<<

|        |                  |   |       |       |          |        |        |       |       |
|--------|------------------|---|-------|-------|----------|--------|--------|-------|-------|
| KLXX   | BRECKENRIDGE, TX | 228 C3  | 93.5  | 12.5  | 32-46-55 | 1.1    | 177    |       |       |
| LIC    | Fac. No. 7702    | BLH-19930614KE                                | 136   |       | 98-56-22 | 177.4  | -175.9 | SHORT |       |
| KLXX   | BRECKENRIDGE, TX | 228 C3  | 93.5  | 50.0  | 32-46-55 | 1.1    | 190.0  |       |       |
| CP     | Fac. No. 7702    | BPH-199806121A                                | 130   |       | 98-56-22 | 177.4  | -188.9 | SHORT |       |
| KICM   | KRUM, TX         | 229 C1  | 93.7  | 14.0  | 33-26-13 | 153.5  | 158    | *     |       |
| APP    | Fac. No. 36289   | BMPH-20000725AAZ                              | 299   |       | 97-29-05 | 61.8   | -4.5   | SHORT |       |
|        |                  | Use of 73.215 for short spacing requires: 144 |       |       |          |        |        | +9.5  | CLOSE |
| ALLOC  | KRUM, TX         | 229 C1  | 93.7  |       | 33-27-59 | 157.53 | 158    |       |       |
| RSV    | Fac. No. 36289   | -   |       | 0     | 97-27-15 | 61.3   | -0.47  | CLOSE |       |
| KRKZ   | ALTUS, OK        | 228 C2  | 93.5  | 45.0  | 34-26-20 | 189.94 | 190    |       |       |
| LIC    | Fac. No. 1196    | BLH-19890227KG                                | 161   |       | 99-30-08 | 344.2  | -0.06  | CLOSE |       |
| ALLOCR | BUFFALO GAP, TX  | 227 A   | 93.3  |       | 32-16-55 | 106.31 | 106    |       |       |
| ADD    |                  | RM-10171                                      |       | 0     | 99-53-54 | 238.1  | +0.31  | CLOSE |       |
| ALLOCR | ARCHER CITY, TX  | 230 C1  | 93.9  |       | 33-36-58 | 91.6   | 79     |       |       |
| ADD    |                  | Dockt-2000-148                                |       | 0     | 98-51-42 | 4.5    | +12.6  | CLOSE |       |
| ALLOC  | OLNEY, TX        | 282 C2  | 104.3 |       | 33-08-47 | 39.9   | 20     |       |       |
| VAC    | Fac. No. 95317   | Dockt-1997-225                                |       | 0     | 98-52-00 | 9.9    | +19.9  | CLEAR |       |
| KSEYFM | SEYMOUR, TX      | 230 C2  | 93.9  | 50.0  | 33-32-52 | 89.4   | 58     |       |       |
| CP     | Fac. No. 71535   | BPH-20000406ABD                               | 150   |       | 99-16-29 | 339.7  | +31.4  | CLEAR |       |
| KSTVFM | DUBLIN, TX       | 226 C3  | 93.1  | 7.00+ | 32-10-57 | 91.3   | 56     |       |       |
| APP    | Fac. No. 15742   | BMPH-199904021E                               | 178   |       | 98-17-12 | 137.6  | +35.3  | CLEAR |       |
| ALLOCR | SEYMOUR, TX      | 230 C2  | 93.9  |       | 33-35-59 | 96.0   | 58     |       |       |
| DEL    |                  | Dockt-2000-148                                |       | 0     | 99-18-42 | 338.9  | +38.0  | CLEAR |       |

\* 73.215 application

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EXHIBIT E1-3  
MAP SHOWING PROPOSED LOCATION  
RADIO STATION KLXK  
CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT  
BRECKENRIDGE, TEXAS



32-50-00  
98-55-00

SCALE 1:24 000



CONTOUR INTERVAL 10 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929

PROPOSED SITE  
32-47-32  
98-56-24  
1215 FT MSL

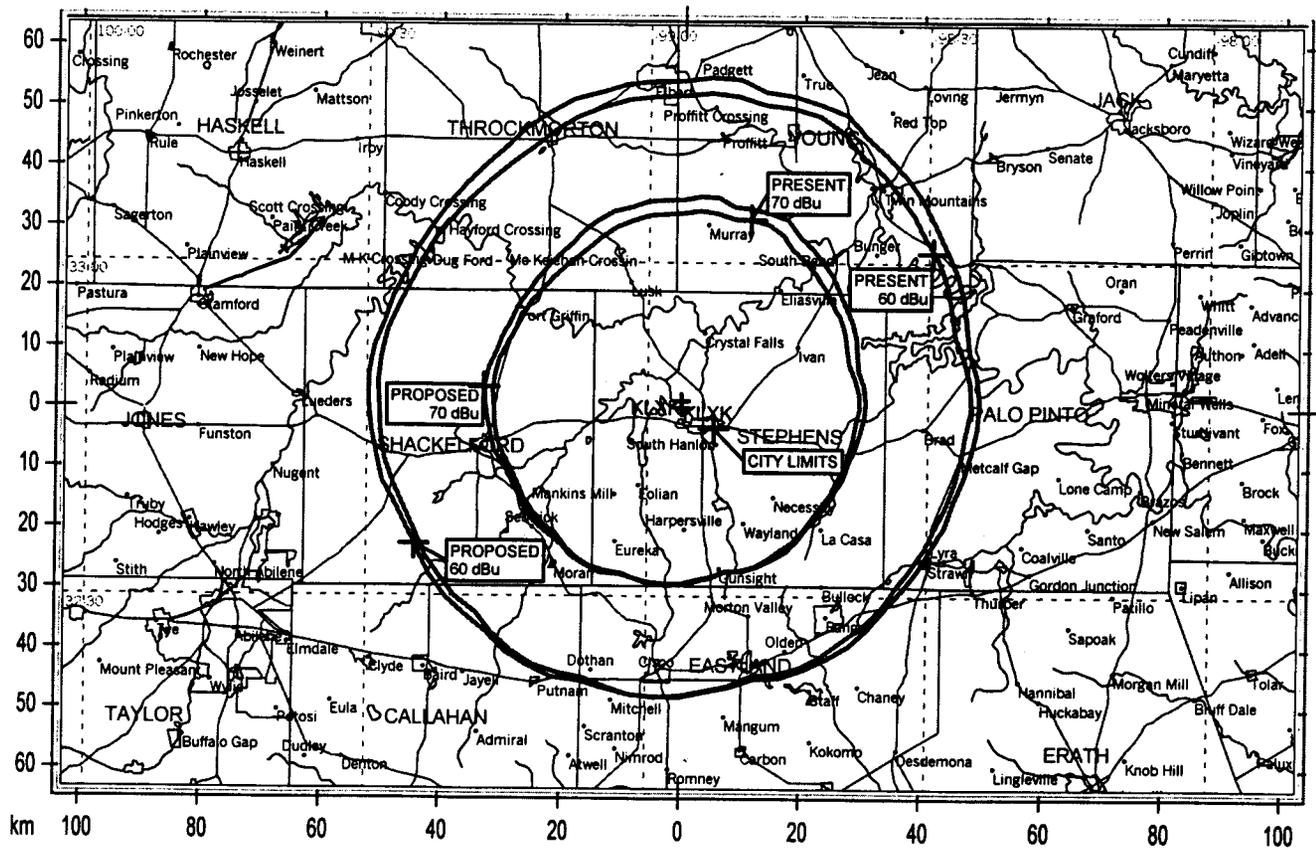
32-47-30  
98-57-30

BRECKENRIDGE, TEX.  
N2245-W9852.5/7.5

1958  
PHOTOREVISED 1981  
DMA 6249 IV SW-SERIES V882

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EXHIBIT E1-4  
 MAP SHOWING PRESENT & PROPOSED SERVICE CONTOURS  
 RADIO STATION KLXX  
 CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT  
 BRECKENRIDGE, TEXAS  
 =====



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EXHIBIT E1-5  
 TABULATION OF DISTANCES TO PROPOSED SERVICE CONTOURS  
 RADIO STATION KLXX  
 CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT  
 BRECKENRIDGE, TEXAS  
 =====

DISTANCES TO CONTOURS (Kilometers):  
 Frequency: 93.5000 MHz  
 Coordinates: N 32 47 32 W 98 56 24  
 F(50,50) Curves Number of Contours: 2

| DISTANCES TO CONTOURS (Kilometers): |      |         |                       |      | DISTANCES TO CONTOURS (Kilometers): |      |         |                       |      |
|-------------------------------------|------|---------|-----------------------|------|-------------------------------------|------|---------|-----------------------|------|
| AZ                                  | HAAT | ERP     | CONTOUR LEVELS (dBu): |      | AZ                                  | HAAT | ERP     | CONTOUR LEVELS (dBu): |      |
| (degs)                              | (m)  | (kW)    | 60.0                  | 70.0 | (degs)                              | (m)  | (kW)    | 60.0                  | 70.0 |
| .0                                  | 158  | 50.0000 | 53.3                  | 33.5 | 180.0                               | 127  | 50.0000 | 48.9                  | 30.1 |
| 5.0                                 | 164  | 50.0000 | 53.9                  | 34.1 | 185.0                               | 129  | 50.0000 | 49.2                  | 30.3 |
| 10.0                                | 165  | 50.0000 | 54.0                  | 34.2 | 190.0                               | 130  | 50.0000 | 49.4                  | 30.5 |
| 15.0                                | 159  | 50.0000 | 53.3                  | 33.6 | 195.0                               | 130  | 50.0000 | 49.3                  | 30.4 |
| 20.0                                | 163  | 50.0000 | 53.8                  | 34.0 | 200.0                               | 130  | 50.0000 | 49.5                  | 30.5 |
| 25.0                                | 167  | 50.0000 | 54.3                  | 34.4 | 205.0                               | 138  | 50.0000 | 50.5                  | 31.2 |
| 30.0                                | 170  | 50.0000 | 54.5                  | 34.7 | 210.0                               | 140  | 50.0000 | 50.9                  | 31.5 |
| 35.0                                | 161  | 50.0000 | 53.6                  | 33.8 | 215.0                               | 140  | 50.0000 | 50.8                  | 31.5 |
| 40.0                                | 156  | 50.0000 | 53.0                  | 33.3 | 220.0                               | 136  | 50.0000 | 50.2                  | 31.0 |
| 45.0                                | 155  | 50.0000 | 52.8                  | 33.1 | 225.0                               | 136  | 50.0000 | 50.3                  | 31.1 |
| 50.0                                | 151  | 50.0000 | 52.3                  | 32.7 | 230.0                               | 140  | 50.0000 | 50.8                  | 31.5 |
| 55.0                                | 146  | 50.0000 | 51.6                  | 32.1 | 235.0                               | 140  | 50.0000 | 50.8                  | 31.5 |
| 60.0                                | 139  | 50.0000 | 50.7                  | 31.4 | 240.0                               | 137  | 50.0000 | 50.3                  | 31.1 |
| 65.0                                | 136  | 50.0000 | 50.2                  | 31.0 | 245.0                               | 136  | 50.0000 | 50.3                  | 31.1 |
| 70.0                                | 132  | 50.0000 | 49.7                  | 30.6 | 250.0                               | 138  | 50.0000 | 50.5                  | 31.3 |
| 75.0                                | 127  | 50.0000 | 48.9                  | 30.1 | 255.0                               | 146  | 50.0000 | 51.6                  | 32.1 |
| 80.0                                | 124  | 50.0000 | 48.5                  | 29.8 | 260.0                               | 146  | 50.0000 | 51.7                  | 32.2 |
| 85.0                                | 127  | 50.0000 | 48.9                  | 30.1 | 265.0                               | 146  | 50.0000 | 51.6                  | 32.1 |
| 90.0                                | 129  | 50.0000 | 49.3                  | 30.4 | 270.0                               | 148  | 50.0000 | 52.0                  | 32.4 |
| 95.0                                | 127  | 50.0000 | 49.0                  | 30.2 | 275.0                               | 148  | 50.0000 | 52.0                  | 32.4 |
| 100.0                               | 126  | 50.0000 | 48.8                  | 30.0 | 280.0                               | 147  | 50.0000 | 51.8                  | 32.3 |
| 105.0                               | 125  | 50.0000 | 48.6                  | 29.9 | 285.0                               | 143  | 50.0000 | 51.2                  | 31.8 |
| 110.0                               | 125  | 50.0000 | 48.6                  | 29.9 | 290.0                               | 141  | 50.0000 | 50.9                  | 31.6 |
| 115.0                               | 125  | 50.0000 | 48.6                  | 29.9 | 295.0                               | 139  | 50.0000 | 50.7                  | 31.4 |
| 120.0                               | 124  | 50.0000 | 48.6                  | 29.9 | 300.0                               | 139  | 50.0000 | 50.6                  | 31.4 |
| 125.0                               | 124  | 50.0000 | 48.6                  | 29.9 | 305.0                               | 138  | 50.0000 | 50.5                  | 31.3 |
| 130.0                               | 123  | 50.0000 | 48.3                  | 29.7 | 310.0                               | 137  | 50.0000 | 50.5                  | 31.2 |
| 135.0                               | 124  | 50.0000 | 48.5                  | 29.8 | 315.0                               | 139  | 50.0000 | 50.6                  | 31.3 |
| 140.0                               | 127  | 50.0000 | 49.0                  | 30.2 | 320.0                               | 140  | 50.0000 | 50.8                  | 31.5 |
| 145.0                               | 130  | 50.0000 | 49.4                  | 30.5 | 325.0                               | 142  | 50.0000 | 51.1                  | 31.7 |
| 150.0                               | 129  | 50.0000 | 49.2                  | 30.3 | 330.0                               | 146  | 50.0000 | 51.7                  | 32.2 |
| 155.0                               | 127  | 50.0000 | 49.0                  | 30.2 | 335.0                               | 152  | 50.0000 | 52.5                  | 32.9 |
| 160.0                               | 125  | 50.0000 | 48.7                  | 29.9 | 340.0                               | 156  | 50.0000 | 53.0                  | 33.3 |
| 165.0                               | 119  | 50.0000 | 47.8                  | 29.3 | 345.0                               | 156  | 50.0000 | 52.9                  | 33.2 |
| 170.0                               | 123  | 50.0000 | 48.3                  | 29.7 | 350.0                               | 158  | 50.0000 | 53.2                  | 33.5 |
| 175.0                               | 123  | 50.0000 | 48.4                  | 29.8 | 355.0                               | 159  | 50.0000 | 53.3                  | 33.6 |

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EXHIBIT E1-6  
 TABULATION OF DISTANCES TO PRESENT SERVICE CONTOURS  
 RADIO STATION KLXK  
 CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT  
 BRECKENRIDGE, TEXAS  
 =====

DISTANCES TO CONTOURS (Kilometers):  
 Frequency: 93.5000 MHz  
 Coordinates: N 32 46 55 W 98 56 22  
 F(50,50) Curves Number of Contours: 2

| DISTANCES TO CONTOURS (Kilometers): |      |         |                       |      | DISTANCES TO CONTOURS (Kilometers): |      |         |                       |      |
|-------------------------------------|------|---------|-----------------------|------|-------------------------------------|------|---------|-----------------------|------|
| AZ                                  | HAAT | ERP     | CONTOUR LEVELS (dBu): |      | AZ                                  | HAAT | ERP     | CONTOUR LEVELS (dBu): |      |
| (degs)                              | (m)  | (kW)    | 60.0                  | 70.0 | (degs)                              | (m)  | (kW)    | 60.0                  | 70.0 |
| .0                                  | 150  | 50.0000 | 52.2                  | 32.6 | 180.0                               | 119  | 50.0000 | 47.8                  | 29.3 |
| 5.0                                 | 154  | 50.0000 | 52.7                  | 33.0 | 185.0                               | 121  | 50.0000 | 48.1                  | 29.5 |
| 10.0                                | 152  | 50.0000 | 52.5                  | 32.8 | 190.0                               | 123  | 50.0000 | 48.3                  | 29.7 |
| 15.0                                | 152  | 50.0000 | 52.4                  | 32.8 | 195.0                               | 121  | 50.0000 | 48.2                  | 29.6 |
| 20.0                                | 158  | 50.0000 | 53.2                  | 33.5 | 200.0                               | 121  | 50.0000 | 48.1                  | 29.5 |
| 25.0                                | 161  | 50.0000 | 53.6                  | 33.8 | 205.0                               | 124  | 50.0000 | 48.6                  | 29.9 |
| 30.0                                | 156  | 50.0000 | 52.9                  | 33.2 | 210.0                               | 129  | 50.0000 | 49.3                  | 30.4 |
| 35.0                                | 146  | 50.0000 | 51.7                  | 32.2 | 215.0                               | 130  | 50.0000 | 49.4                  | 30.5 |
| 40.0                                | 145  | 50.0000 | 51.5                  | 32.0 | 220.0                               | 127  | 50.0000 | 49.0                  | 30.2 |
| 45.0                                | 141  | 50.0000 | 51.0                  | 31.7 | 225.0                               | 124  | 50.0000 | 48.5                  | 29.8 |
| 50.0                                | 137  | 50.0000 | 50.5                  | 31.2 | 230.0                               | 126  | 50.0000 | 48.8                  | 30.1 |
| 55.0                                | 131  | 50.0000 | 49.6                  | 30.6 | 235.0                               | 129  | 50.0000 | 49.3                  | 30.4 |
| 60.0                                | 127  | 50.0000 | 49.0                  | 30.2 | 240.0                               | 129  | 50.0000 | 49.3                  | 30.4 |
| 65.0                                | 123  | 50.0000 | 48.4                  | 29.8 | 245.0                               | 128  | 50.0000 | 49.1                  | 30.2 |
| 70.0                                | 119  | 50.0000 | 47.8                  | 29.3 | 250.0                               | 127  | 50.0000 | 49.0                  | 30.2 |
| 75.0                                | 115  | 50.0000 | 47.2                  | 28.9 | 255.0                               | 130  | 50.0000 | 49.4                  | 30.4 |
| 80.0                                | 118  | 50.0000 | 47.7                  | 29.2 | 260.0                               | 137  | 50.0000 | 50.4                  | 31.2 |
| 85.0                                | 121  | 50.0000 | 48.1                  | 29.5 | 265.0                               | 137  | 50.0000 | 50.4                  | 31.2 |
| 90.0                                | 119  | 50.0000 | 47.9                  | 29.4 | 270.0                               | 137  | 50.0000 | 50.4                  | 31.2 |
| 95.0                                | 116  | 50.0000 | 47.4                  | 29.1 | 275.0                               | 140  | 50.0000 | 50.8                  | 31.5 |
| 100.0                               | 117  | 50.0000 | 47.5                  | 29.1 | 280.0                               | 140  | 50.0000 | 50.9                  | 31.6 |
| 105.0                               | 115  | 50.0000 | 47.3                  | 29.0 | 285.0                               | 139  | 50.0000 | 50.7                  | 31.4 |
| 110.0                               | 114  | 50.0000 | 47.1                  | 28.9 | 290.0                               | 136  | 50.0000 | 50.3                  | 31.1 |
| 115.0                               | 115  | 50.0000 | 47.2                  | 28.9 | 295.0                               | 134  | 50.0000 | 50.0                  | 30.9 |
| 120.0                               | 115  | 50.0000 | 47.2                  | 28.9 | 300.0                               | 133  | 50.0000 | 49.8                  | 30.8 |
| 125.0                               | 114  | 50.0000 | 47.0                  | 28.8 | 305.0                               | 133  | 50.0000 | 49.9                  | 30.8 |
| 130.0                               | 113  | 50.0000 | 46.9                  | 28.7 | 310.0                               | 132  | 50.0000 | 49.7                  | 30.7 |
| 135.0                               | 114  | 50.0000 | 47.1                  | 28.9 | 315.0                               | 131  | 50.0000 | 49.6                  | 30.6 |
| 140.0                               | 117  | 50.0000 | 47.6                  | 29.2 | 320.0                               | 132  | 50.0000 | 49.7                  | 30.6 |
| 145.0                               | 116  | 50.0000 | 47.4                  | 29.1 | 325.0                               | 132  | 50.0000 | 49.7                  | 30.7 |
| 150.0                               | 117  | 50.0000 | 47.6                  | 29.2 | 330.0                               | 134  | 50.0000 | 49.9                  | 30.8 |
| 155.0                               | 117  | 50.0000 | 47.6                  | 29.2 | 335.0                               | 139  | 50.0000 | 50.7                  | 31.4 |
| 160.0                               | 113  | 50.0000 | 47.0                  | 28.7 | 340.0                               | 144  | 50.0000 | 51.4                  | 31.9 |
| 165.0                               | 109  | 50.0000 | 46.3                  | 28.3 | 345.0                               | 146  | 50.0000 | 51.7                  | 32.2 |
| 170.0                               | 114  | 50.0000 | 47.1                  | 28.8 | 350.0                               | 148  | 50.0000 | 51.9                  | 32.4 |
| 175.0                               | 115  | 50.0000 | 47.3                  | 29.0 | 355.0                               | 149  | 50.0000 | 52.0                  | 32.5 |