

DIAMOND BROADCASTING CORPORATION.

Radio Station KACE

Tremonton, UT

1470 kHz, 1 kW-D, 0.038 kW-N, U

ENGINEERING STATEMENT

This engineering statement has been prepared on behalf of Diamond Broadcasting Corporation, permittee of commercial broadcast station KACE (AM), Tremonton, UT (CP # BNP-20001023AEU, FCC ID # 129784), in support of a minor change application to change location of its transmitter site, change class, operating power and antenna system. .

The proposed tower will be situated at NAD-27 coordinates of N 41-34-42 W 112-06-03 and antenna structure registration is not applicable since the overall height will not exceed 58.8 meters.

It is pointed out that there is a minor amount of mutual 5 mV/m contour overlap with second adjacent channel station KYFO, Ogden, UT. Figure 8B is a detailed allocation map which clearly shows the overlap area to be totally within Salt Lake and has no population. Hence it is respectfully requested that a waiver be granted for this water area overlap.

ENVIRONMENTAL CONSIDERATIONS

The Commission's Rules implementing the Environmental Policy Act does not categorize this proposal as a major action, as it does not involve any of the facilities or actions listed under §1.305 or §1.307 of the Rules.

Regarding the non-ionizing radiofrequency emission from the proposed antenna, Table I on page 49 of O.E.T. Bulletin No. 65 lists the distance in meters at which fields from AM stations are predicted to fall below the FCC and ANSI maximum. Assuming the worst-case of 1000-watt daytime power being fed into the antenna, Table I requires the fence to be at least 3 meters from the tower face. The applicant proposes a fence at least 3.05 meters (10') from the tower face.

Since the proposed fence is well within agreement with O.E.T. Bulletin No. 65, this proposal will comply with both FCC and ANSI standards regarding radiofrequency exposure. Should any maintenance worker require access to the tower, KACE will either reduce power or suspend operation until workers are outside the tower fence. Appropriate RF warning signs will be placed on all sides of the fences and it may be assumed that there will be no significant effect on the human environment with regard to exposure of the general public.

DAYTIME ALLOCATION CONSIDERATIONS

A study has been made of stations on 1470 kHz and on channels within 30 kHz of that frequency in determining the protection requirements of the proposed KACE operation. Those stations which were deemed to merit particular consideration are:

KRXR- Gooding, ID	1480 kHz, 1 kW-D
KHQN- Spanish Fork, UT	1480 kHz, 1 kW-D
KYFO - Ogden, UT	1490 kHz, 1 kW-U

The remaining stations studied were at such a distance so as not to require detailed contour protection. Figure 8 is an allocation map showing contours of particular allocation interest for this proposal and the above listed stations. Location of contours for these stations employed notified inverse fields for non-directional operation in conjunction with FCC M-3 soil conductivity, except where measured conductivity was available.

Figure 10, Pages 1 and 2, document radial measurements from KYFO at 340°T to indicate measured soil conductivity.

NIGHTTIME ALLOCATION CONSIDERATIONS

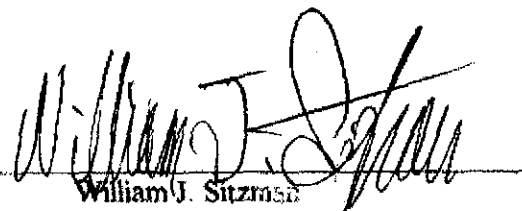
Figure 11A is a nighttime limit study of the proposed KACE nighttime operation, showing the 50% RSS to be 6.845 mV/m with contributions from XERCN and KKTY. The 25% RSS was found to be 8.045 mV/m with contributions from XERCN, KKTY, KJID, KVVZ, and KELA. It is pointed out that the XERCN facility used in the RSS computations is that which is accepted by the Commission, not the objected facility.

Figure 11B, Pages 1 and 2, detail the nighttime protection constraints from the proposed site in tabular form. The most restrictive station is KKTY, Douglas, WY, which limits KACE to 58.6 mV/m at theta angle 12.9 degrees. This will permit KACE to operate with 38 watts nighttime and produce a horizontal field of 61.12 mV/m.

CONCLUSION

The proposed operation of KACE from its new tower site will provide Tremonton, UT with greater than 5 mV/m daytime and provide Class D nighttime operation to that community. Hence this proposal comports with domestic rules and international treaties and is in the public interest.

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