

Exhibit 11-1
Waiver Request for 2nd adjacent Spacing

(Sioux Falls, SD Proposal, channel 286, 105.1 MHz)

4/8/2004

Refuge Media Group respectfully requests waiver of 47 C.F.R. § 74.1204(a)

This application is 2nd adjacent to Station KKLS-FM. The distance from this proposal's location to KKLS-FM's transmitting facility is *less* than what is required pursuant to § 74.1204(a). However, pursuant to the *lack of population* criteria set forth in § 74.1204(d), a waiver of § 74.1204(a) can be granted. As shown below, the predicted interference signal reaches a population of zero as the interfering signal does not reach the ground.

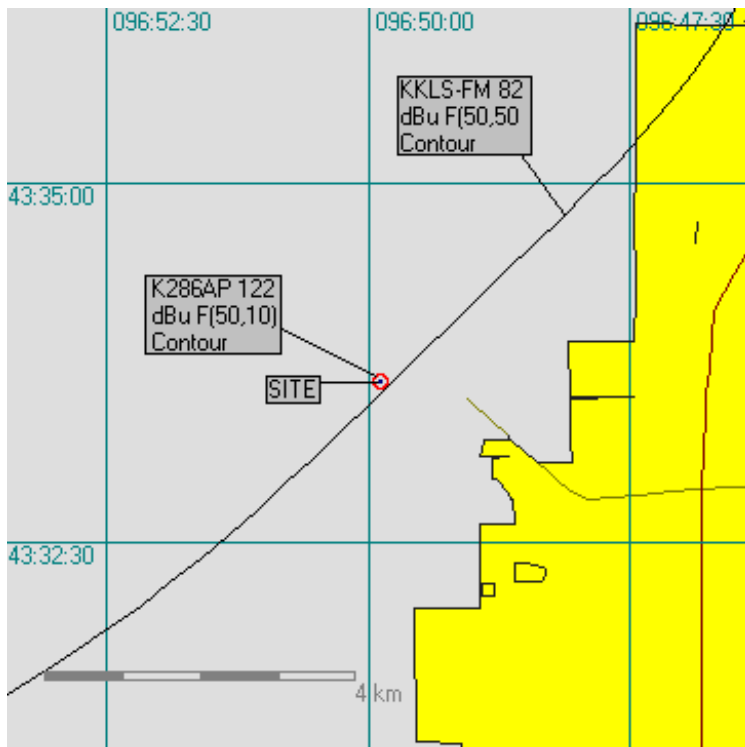
KKLS-FM

Channel 284C1 (104.7 MHz)
43° 43' 46" NL, 97° 5' 14" WL
RCAMSL: 797m
RCAGL: 248 meters
Bearing toward Proposal: 132° True
ERP: 100.0 kW
HAAT @ 132° True: 300.6 meters
Distance to Proposed site: 27.9 km
F(50,50) Signal @ 27.988 km in 132° radial: 82.0 dBu

K286AP:

Channel 286FX (105.1 MHz)
43° 33' 37" NL, 96° 49' 53" WL
RCAMSL: 502 meters
RCAGL: 59 meters
Bearing to KKLS-FM: 312° True
ERP: 0.250 kW
HAAT: (max of 12 radials:) 66.9 m
Interference Signal: 122.0 dBu F(50,10)*
Distance to Interference signal: 88 meters

*Based on the ratios set forth in § 74.1204(a) for stations separated by 2 or 3 channels, the interference signal of this proposed 2nd adjacent translator must be 40 dB (100:1 ratio) higher before predicted interference to KKLS-FM will occur. (82 + 40 = 122)



Interference Does Not Hit the Ground:

Based on the above data, the predicted interference *does* hit the ground. However, the field strength of the proposed translator's antenna *varies* with angle of depression from horizontal. As shown in the table in Page 2 below, the interference contour **stays above** the ground by 18.1 m. Therefore a grant of this proposal will not cause predicted interference with anyone trying to receive station KKLS-FM.

NOTE: Even though the predicted interference stays above the ground, in the event any real world interference should occur to KKLS-FM or any other station, Refuge Media Group certifies to comply with 47 C.F.R. § 74.1203 concerning actual interference.

Terrain Source: FCC 30-sec DEM (NGDC)

Exhibit 11-1 Page 2
Vertical Ground Clearance Tabulations

Antenna Manufacturer: Armstrong

Max ERP: 0.250

Antenna Model: FMA-707-1 (Single Element)

RCAGL: 59 meters

Note: See Exhibit 11-2 “Antenna’s Vertical Pattern”

Interfering contour: F(50,10) 122.0 dBu

| Depression Angle (from COR) | Antenna Relative Field | ERP (watts) | Dist to F(50,10) Interfering Contour from antenna (m) | Horizontal Dist of F(50,10) Interfering from Tower (m) | Vertical Clearance of F(50,10) Interfering Contour above ground (m) |
|--------------------------------|---------------------------|----------------|---|--|---|
| 5 | .99 | 245.0 | 87.0 | 86.7 | 51.4 |
| 10 | .98 | 240.1 | 86.0 | 84.7 | 44.1 |
| 15 | .94 | 220.9 | 83.0 | 80.2 | 37.5 |
| 20 | .91 | 207.0 | 80.0 | 75.2 | 31.6 |
| 25 | .88 | 193.6 | 78.0 | 70.7 | 26.0 |
| 30 | .84 | 176.4 | 74.0 | 64.1 | 22.0 |
| 35 | .77 | 148.2 | 68.0 | 55.7 | 20.0 |
| 38 | .73 | 133.2 | 64.0 | 50.4 | 19.6 |
| 39 | .72 | 129.6 | 63.0 | 49.0 | 19.4 |
| 40 | .71 | 126.0 | 63.0 | 48.2 | 18.5 |
| 41 | .70 | 122.5 | 62.0 | 46.8 | 18.3 |
| 42 | .69 | 119.0 | 61.0 | 45.3 | 18.2 |
| 43 | .67 | 112.2 | 59.0 | 43.1 | 18.8 |
| 44 | .66 | 108.9 | 58.0 | 41.7 | 18.7 |
| 45 | .65 | 105.6 | 57.0 | 40.3 | 18.7 |
| 46 | .64 | 102.4 | 56.0 | 38.9 | 18.7 |
| 47 | .63 | 99.2 | 55.0 | 37.5 | 18.8 |
| 48 | .62 | 96.1 | 55.0 | 36.8 | 18.1 |
| 49 | .61 | 93.0 | 54.0 | 35.4 | 18.2 |
| 50 | .60 | 90.0 | 53.0 | 34.0 | 18.4 |
| 51 | .58 | 84.1 | 51.0 | 32.0 | 19.4 |
| 52 | .57 | 81.2 | 50.0 | 30.8 | 19.6 |
| 55 | .52 | 67.6 | 46.0 | 26.3 | 21.3 |
| 60 | .45 | 50.6 | 40.0 | 20.0 | 34.6 |
| 70 | .32 | 25.6 | 28.0 | 9.58 | 32.7 |
| 80 | .18 | 8.10 | 16.0 | 2.78 | 43.2 |
| 90 | .10 | 2.50 | 9.0 | 0 | 50.0 |

Minimum Distance Above Ground Level: 18.1 meters