TECHNICAL EXHIBIT
AMENDMENT TO
APPLICATION FOR FM CONSTRUCTION PERMIT
FCC FILE NO. BPH-20051117ABV
FM STATION KMGL
FACILITY ID 55708
OKLAHOMA CITY, OKLAHOMA
CH 281C 100 KW 472 M

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an amendment to the pending application for construction permit to modify the licensed facilities of FM station KMGL at Oklahoma City, Oklahoma. Currently, KMGL is licensed (BLH-19820830AH) to operate on channel 281C (104.1 MHz) with a nondirectional antenna maximum effective radiated power (ERP) of 100 kilowatts and an antenna radiation center height above average terrain (HAAT) of 415 meters. The pending application (BPH-20051117ABV) proposes operation on channel 281C from a new transmitter site and with an ERP of 100 kW and an HAAT of 518 meters.

Background and Purpose of Instant Amendment Application

In response to a petition for rule making filed by Charles Crawford ("Crawford Petition") seeking to allot channel 281C2 to Shattuck, Oklahoma, the FCC issued an Order to Show Cause directed to KMGL to show cause why its facilities should not be reclassified to a Class C0 facility because its current HAAT (415 meters) was less than the Class C minimum (451 meters) with an ERP of 100 kW.[1]

In response to the Order to Show Cause, KMGL filed the pending application (BPH-20051117ABV) which proposes to relocate the KMGL transmitter site, increase the KMGL HAAT to 518 meters and maintain KMGL's Class C status.

This instant amendment application is being filed in response to the FCC's letter of January 24, 2006[2] to provide information concerning the status of the registration of the antenna structure and to conform the overall tower height data

[1] See Order to Show Cause in RM-11211, adopted April 6, 2005, released April 8, 2005.
[2] See Letter dated January, 24, 2006 from Rodolfo F. Bonacci, Assistant Chief, Audio Division, Media Bureau to Renda Broadcasting Corp. of Nevada, Re: KMGL(FM); Oklahoma City, OK, Facility ID No. 55708, Renda Broadcasting Corp. of Nevada, BPH-20051117ABV.

to the FAA approved data. The FAA has issued a Determination of No Hazard to Air Navigation in Aeronautical Study No. 2005-ASW-3912-OE for the tower proposed to be used by KMGL. A copy of the FAA Determination is attached as Figure 3. The FAA Determination becomes final on March 18, 2006. According to an agent of the tower proponent, the tower will be registered immediately after the FAA Determination becomes final. The FCC will be immediately notified of the antenna structure registration number upon receipt.

Response to Paragraph 5 - Antenna Structure Registration

It is proposed to operate from a new tower. The FAA has issued a Determination of No Hazard to Air Navigation in Aeronautical Study No. 2005-ASW-3912-OE for the tower proposed to be used by KMGL. A copy of the FAA Determination is attached as Figure 3. The FCC will be immediately notified of the antenna structure registration number upon receipt.

Response to Paragraph 14 – Community Coverage

Figure 1 is a map which demonstrates that KMGL's proposed operation complies with the provisions of Section 73.315. Specifically, it has been determined that the proposed 70 dBu contour will encompass 100% of the area within the Oklahoma City limits.

Response to Paragraph 16

Figure 2 is a separation study from KMGL's proposed antenna location for the channel 281C operation. As shown, the proposed antenna location complies with the minimum distance separation requirements of Section 73.207 for Class C operation on channel 281 towards all existing, authorized and proposed stations and allotments with the exceptions of the proposal to allot channel 281C2 at Shattuck, Oklahoma as set forth in the Crawford Petition and KTDK on channel 281C3 at Sanger, Texas. Each short-spacing is addressed below.

The proposed KMGL operation is short-spaced by 7.12 kilometers to the proposal to allot channel 281C2 to Shattuck, Oklahoma set forth in the Crawford Petition. The Crawford Petition requested the downgrade of KMGL to Class C0

status. However, the instant KMGL application will maintain KMGL's Class C status.

The proposed KMGL operation is short-spaced by 2.90 kilometers to the licensed operation of KTDK on channel 281C3 at Sanger, Texas (BLH-20050309AAI). The licensed KTDK operation short-spaced KMGL's licensed operation (BLH-19820830AH) under Section 73.215 (4.00 kilometer short-spacing). As the distance to KTDK's licensed operation is increased (i.e. the short-spacing is decreased), KMGL is permitted to operate with maximum Class C facilities (ERP 100 kW/HAAT 600 m) towards KTDK's licensed operation.

Environmental Considerations

The proposed KMGL facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields.

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. Figure 4 is vertical plane relative field pattern for the proposed ERI 10-bay, 1 wavelength bay spacing, nondirectional antenna. As shown on Figure 4, the maximum vertical relative field value towards the tower base (-60° to -90° elevation) is less than 0.30. Therefore, using a "worst-case" vertical relative field value of 0.30, the total ERP of 200 kW (H+V) and an antenna center of radiation height above ground level of 475 meters, the calculated power density at 2 meters above ground level at the base of the tower is 0.0027 milliwatt per square centimeter (mW/cm^2), or 1.34% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.2 mW/cm^2 for FM frequencies). Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the tower will be restricted and appropriately marked with warning signs. Furthermore, as this will be a multi-user site, procedures will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such procedures include reducing the average exposure by spreading out the work over a longer period of time, wearing “accepted” RFR protective clothing and/or RFR exposure monitors or scheduling work when the station is at reduced power or shut down.

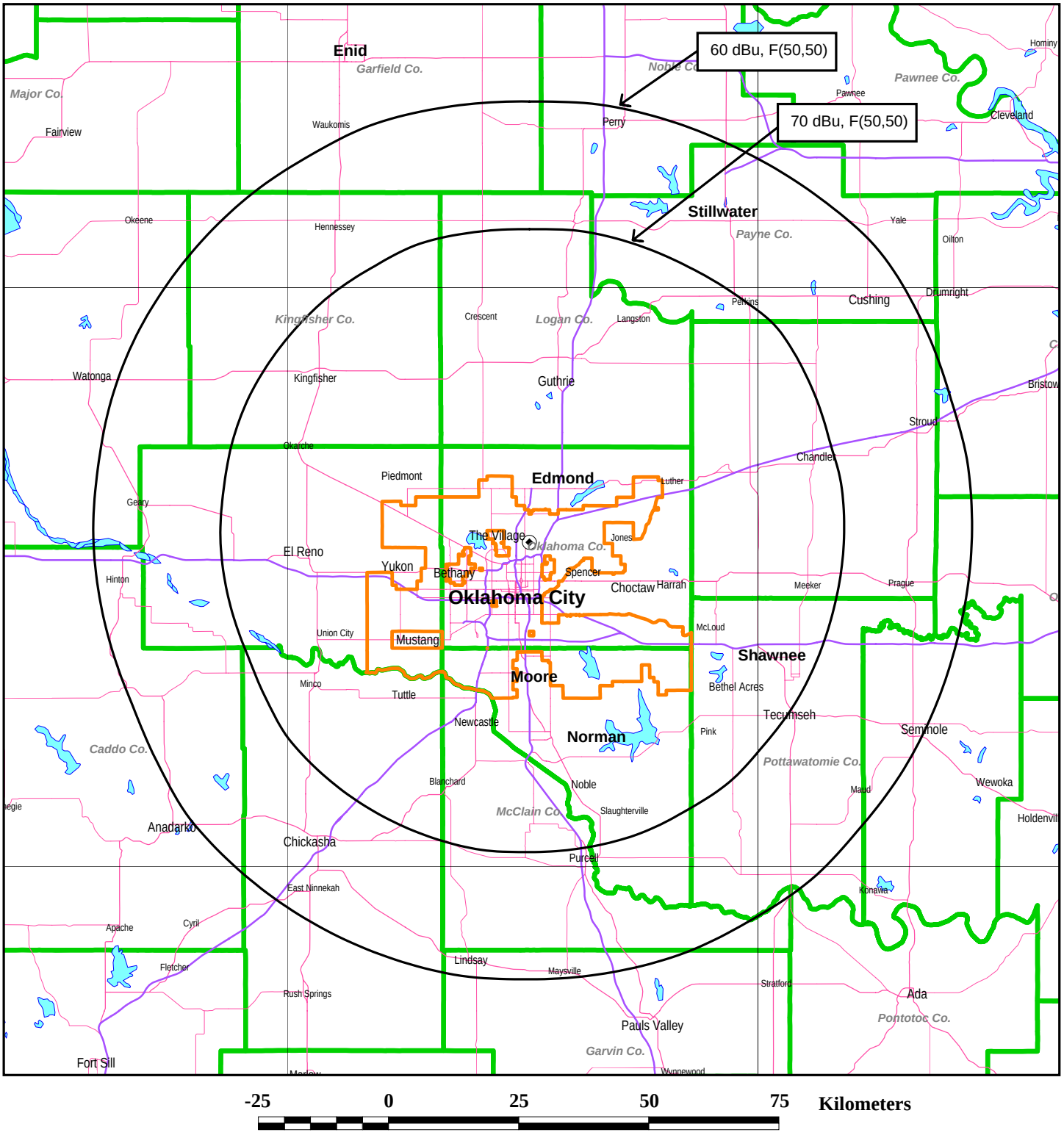
Finally, it is noted that this technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be provided to the FCC by the tower owner as part of the tower registration process.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL 34237-6019
(941) 329-6000
JEFF@DLR.COM

February 16, 2005

Figure 1



COMPLIANCE WITH SECTION 73.315

STATION KMGL
OKLAHOMA CITY, OKLAHOMA
CH 281C 100 KW 472 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CDBS FM SEPARATION STUDY

Job Title: Proposed KMGL, Ch. 281C, Oklahoma City, OK Separation Buffer: 32 km
Channel: 281 C Coordinates: 35-33-36 097-29-07

Call Id	City St	Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
KKNG-FM	NEWCASTLE		BLH	227 C1	100.000	N	35-11-28	N	193.9	42.17	0.0	41.0
50168	OK	LIC C	19980223KC	93.3	243		097-35-49			1.17	Close	
	ANADARKO		RM	278 C	0.000	N	35-23-18	N	259.9	105.45	99.0	105.0
	OK	RSV C	9548	103.5			098-37-41			0.45	Close	
KVSP	ANADARKO		BLH	278 C	100.000	N	35-15-04	N	251.8	108.17	99.0	105.0
2189	OK	LIC C	20040723AAG	103.5	600		098-36-53			3.17	Close	
	OKEMAH		RM	279 C1	0.000		35-14-22		108.2	112.25	99.0	105.0
	OK	ADD C	11228	103.7			096-18-48			7.25	Close	
KBVL	PAWHUSKA		BLH	280 A	6.000	N	36-44-56	N	38.5	169.79	142.0	165.0
56088	OK	LIC C	19970716KB	103.9	100		096-17-51			4.79	Close	
KQXC-FM	WICHITA FAL		BLH	280 C2	19.000	N	33-54-04	N	207.9	207.80	176.0	188.0
55380	TX	LIC C	20030903ABP	103.9	246		098-32-21			19.80	Clear	
KMGL	OKLAHOMA CI		BPH	281 C	100.000	N	35-33-36	N	90.0	0.00		
55708	OK	APP C	20051117ABV	104.1	518		097-29-07					
KMGL	OKLAHOMA CI		BLH	281 C	100.000	N	35-32-58	N	193.3	1.20[1]		
55708	OK	LIC C	19820830AH	104.1	415		097-29-18					
	OKLAHOMA CI		RM	281 C	0.000		35-32-58		193.3	1.20		
	OK	DEL C	11211	104.1			097-29-18					
	OKLAHOMA CI		RM	281 C0	0.000		35-32-58		193.3	1.20		
	OK	ADD C	11211	104.1			097-29-18					
KTDK	SANGER		BLH	281 C3	6.200	N	33-28-47	Y	170.2	234.10	226.0	237.0
26146	TX	LIC C	20050309AAI	104.1	192		097-03-22			-2.90	**Short[2]**	
	SHATTUCK		RM	281 C2	0.000		36-06-45		285.5	241.88	237.0	249.0
	OK	ADD C	11211	104.1			100-04-30			-7.12	**Short[3]**	

[1] Pending KMGL application being amended by the instant proposal.

[2] The licensed KTDK operation (BLH-20050309AAI) short-spaced KMGL's licensed operation (BLH-19820830AH) under Section 73.215. As the distance to KTDK's licensed operation is increased (i.e. the short-spacing is decreased), KMGL is permitted to operate with maximum Class C facilities (ERP 100 kW/HAAT 600 m) towards KTDK's licensed operation.

[3] A petition for rule making filed by Charles Crawford ("Crawford Petition") seeking to allot channel 281C2 to Shattuck, Oklahoma, requested the downgrade of KMGL to Class C0 status. However, the instant KMGL application will maintain KMGL's Class C status.

Call Id	City St Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
KGGF-FM	FREDONIA KS LIC C 19970724KA	BLH	281 C3 104.1	7.300 163	N	37-22-31 095-43-41	Y	37.4	255.70 18.70	226.0 Clear	237.0
NEW 165381	GRANITE OK APP C 20050812ASW	BSFH	282 C3 104.3	0.000		34-52-15 099-17-36		245.5	181.51 5.51	165.0 Close	176.0
	GRANITE OK VAC C		282 C3 104.3	0.000	N	34-57-38 099-22-00	N	249.2	183.67 7.67	165.0 Close	176.0
NEW 166022	GRANITE OK APP C 20050812AVD	BSFH	282 C3 104.3	0.000		34-57-38 099-22-00		249.2	183.67 7.67	165.0 Close	176.0
95786	WYNNEWOOD OK VAC C		283 A 104.5	0.000	N	34-38-42 097-10-00	N	164.0	105.58 10.58	89.0 Close	95.0
	WYNNEWOOD OK DEL C CP-03181	RM	283 A 104.5	0.000		34-38-42 097-10-00		164.0	105.58 10.58	89.0 Close	95.0
	ELMORE CITY OK ADD C CP-03181	RM	283 A 104.5	0.000		34-34-30 097-30-30		181.1	109.30 14.30	89.0 Close	95.0
KSLE 77278	WEWOKA OK LIC C 19971211KC	BLH	284 A 104.7	1.700 154	N	35-05-31 096-32-29	Y	121.0	100.31 5.31	89.0 Close	95.0

Federal Aviation Administration
Air Traffic Airspace Branch, ASW-520
2601 Meacham Blvd.
Fort Worth, TX 76137-0520

Aeronautical Study No.
2005-ASW-3912-OE
Prior Study No.
1977-ASW-482-OE

Issued Date: 02/06/2006

Tony Flores
Richland Towers
4890 W. Kennedy Blvd., Suite 920
Tampa, FL 33609

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has completed an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure Type:	Antenna Tower
Location:	Oklahoma City, OK
Latitude:	35-33-36.2 NAD 83
Longitude:	97-29-8.1
Heights:	1609 feet above ground level (AGL)
	2749 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the structure would not be a hazard to air navigation provided the following condition(s) is(are) met:

As a condition to this Determination, the structure should be marked and/or lighted in accordance with FAA Advisory Circular 70/7460-1 K, Obstruction Marking and Lighting, paint/red lights - Chapters 3(Marked),4,5(Red),&12.

It is required that the enclosed FAA Form 7460-2, Notice of Actual Construction or Alteration, be completed and returned to this office any time the project is abandoned or:

X__ At least 10 days prior to start of construction
(7460-2, Part I)

X__ Within 5 days after the construction reaches its greatest height
(7460-2, Part II)

As a result of this structure being critical to flight safety, it is required that the FAA be kept appraised as to the status of the project. Failure to respond to periodic FAA inquiries could invalidate this determination.

See attachment for additional condition(s) or information.

While the structure does not constitute a hazard to air navigation, it would be located within or near a military training area and/or route.

This determination expires on 08/06/2007 unless:

(a) extended, revised or terminated by the issuing office.
(b) the construction is subject to the licensing authority of

the Federal Communications Commission (FCC) and an application for a construction permit has been filed , as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE POSTMARKED OR DELIVERED TO THIS OFFICE AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE.

This determination is subject to review if an interested party files a petition on or before March 8, 2006. In the event a petition for review is filed, it must contain a full statement of the basis upon which it is made and be submitted in triplicate to the Manager, Airspace and Rules Division - Room 423, Federal Aviation Administration, 800 Independence Ave, Washington, D.C. 20591.

This determination becomes final on March 18, 2006 unless a petition is timely filed. In which case, this determination will not become final pending disposition of the petition. Interested parties will be notified of the grant of any review.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

This aeronautical study considered and analyzed the impact on existing and proposed arrival, departure, and en route procedures for aircraft operating under both visual flight rules and instrument flight rules; the impact on all existing and planned public-use airports, military airports and aeronautical facilities; and the cumulative impact resulting from the studied structure when combined with the impact of other existing or proposed structures. The study disclosed that the described structure would have no substantial adverse effect on air navigation.

An account of the study findings, aeronautical objections received by the FAA during the study (if any), and the basis for the FAA's decision in this matter can be found on the following page(s).

A copy of this determination will be forwarded to the Federal Communications Commission if the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at (202)267-9219. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2005-ASW-3912-OE.

Signature Control No: 427658-437133 (DNH)

Kevin P. Haggerty
Manager, Obstruction Evaluation Service

Attachment(s)
Additional Information
Frequency Data
Map
7460-2 Attached

Additional Information for ASN 2005-ASW-3912-OE

The proposed increase in height of an existing 1257 foot AGL / 2399 foot AMSL to a height of 1609 feet AGL / 2749 feet AMSL would be located approximately 8.06 NM east of the Wiley Post Airport, Oklahoma City, Oklahoma, and approximately 11.48 NM north/northeast of the Will Rogers World Airport, Oklahoma City, Oklahoma.

The proposal was originally submitted at an overall height of 1809 feet AGL / 2949 feet AMSL. Subsequent to the initial submission, the sponsor has reduced the requested height to 1609 feet AGL / 2749 feet AMSL. At this reduced height, the proposal would exceed the obstruction standards of Title 14, Code of Federal Regulations, part 77 as follows:

- Section 77.23(a) (1) by 1109 feet - a height that exceeds more than 500 feet above ground level (AGL). NOTE: A nearby existing 1619 foot AGL / 2749 foot AMSL structure exceeds this standard by 1119 feet.

The proposal was not circularized to the public for aeronautical comment because it would be located in proximity to existing structures of comparable heights, would have no greater effect on aeronautical operations than the existing structures, and there is no plan on file with the Federal Aviation Administration (FAA) to either alter or remove the existing structures. An existing 1619 foot AGL / 2749 foot AMSL tower structure is located approximately 3,966 feet south of the proposal, and an existing 1602 foot AGL / 2749 foot AMSL structure is located approximately 3,196 feet north/northwest of the proposal. Other existing towers of comparable heights are also located nearby.

Part 77 establishes standards used to identify obstructions, which are subsequently studied to determine the impact on air navigation. The fact that the proposed structure exceeds certain standards of Part 77 is not, in itself, sufficient grounds for issuance of a Determination of Hazard.

Aeronautical study disclosed that the proposed structure would have no greater effect on any existing or proposed arrival, departure, or en route instrument flight rule (IFR) operations, procedures, or minimum flight altitudes than nearby existing tower structures of comparable heights.

Study for possible visual flight rules (VFR) effect disclosed that the proposed structure would have no effect on any existing or proposed arrival or departure VFR operations or procedures. It would not conflict with airspace required to conduct normal VFR traffic pattern operations at any known public use or military airports.

The proposed structure would penetrate altitudes commonly considered available for VFR en route flight. Although it would be within 2 statute miles of a highway, which may be used for VFR navigational reference, its location has no greater effect on VFR navigation than nearby existing structures of comparable heights.

The proposed structure will be appropriately obstruction marked and lighted to make it more conspicuous to airmen should circumnavigation be necessary.

This proposal has been approved at the highest above mean sea level (AMSL) height that would not have an adverse effect on aircraft operations in the area. Any height exceeding an overall height of 2749 feet AMSL may have resulted in a determination of hazard. Therefore, should any subsequent information be

received, such as survey data or a change in ground elevation, indicating the overall height of this structure exceeds the height approved, the FAA will request that the structure be lowered not to exceed the overall approved height.

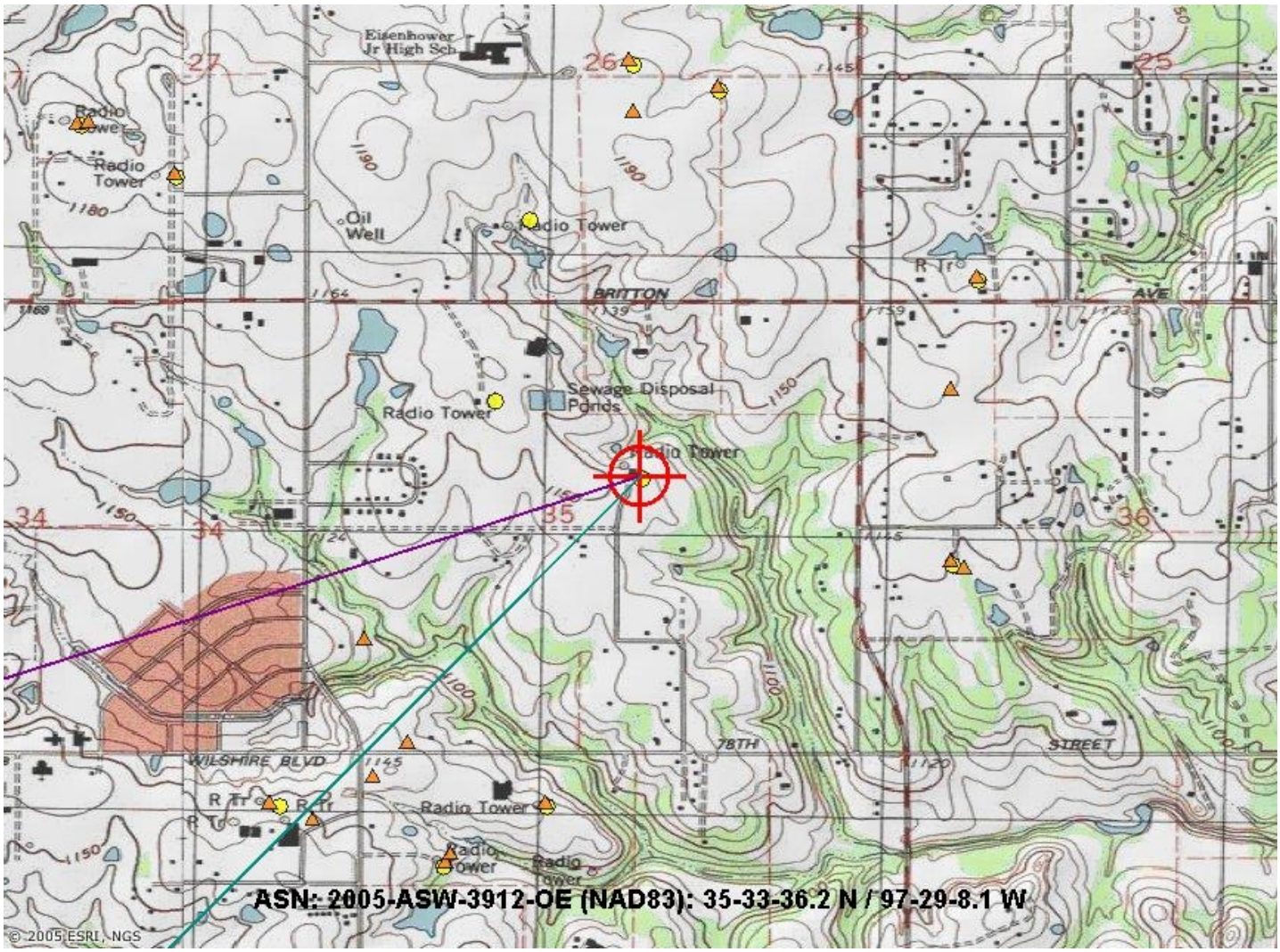
The cumulative impact of the proposed structure, when combined with other existing structures, is not considered significant. Study did not disclose any greater effect on existing or proposed public-use or military airports or navigational facilities than nearby existing structures of comparable heights. Nor would the proposal affect the existing capacity of any known existing or planned public-use or military airport.

Therefore, it is determined that the proposed construction would not have a substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on any air navigation facility and would not be a hazard to air navigation.

Frequency Data for ASN 2005-ASW-3912-OE

LOW FREQUENCY	HIGH FREQUENCY	FREQUENCY UNIT	ERP	ERP UNIT
901	902	MHz	7	W
932	932.5	MHz	17	dBW
806	824	MHz	500	W
824	849	MHz	500	W
851	866	MHz	500	W
869	894	MHz	500	W
896	901	MHz	500	W
935	940	MHz	1000	W
1850	1910	MHz	1640	W
1930	1990	MHz	1640	W
2305	2310	MHz	2000	W
2345	2360	MHz	2000	W
930	931	MHz	3500	W
931	932	MHz	3500	W
940	941	MHz	3500	W

Map for ASN 2005-ASW-3912-OE



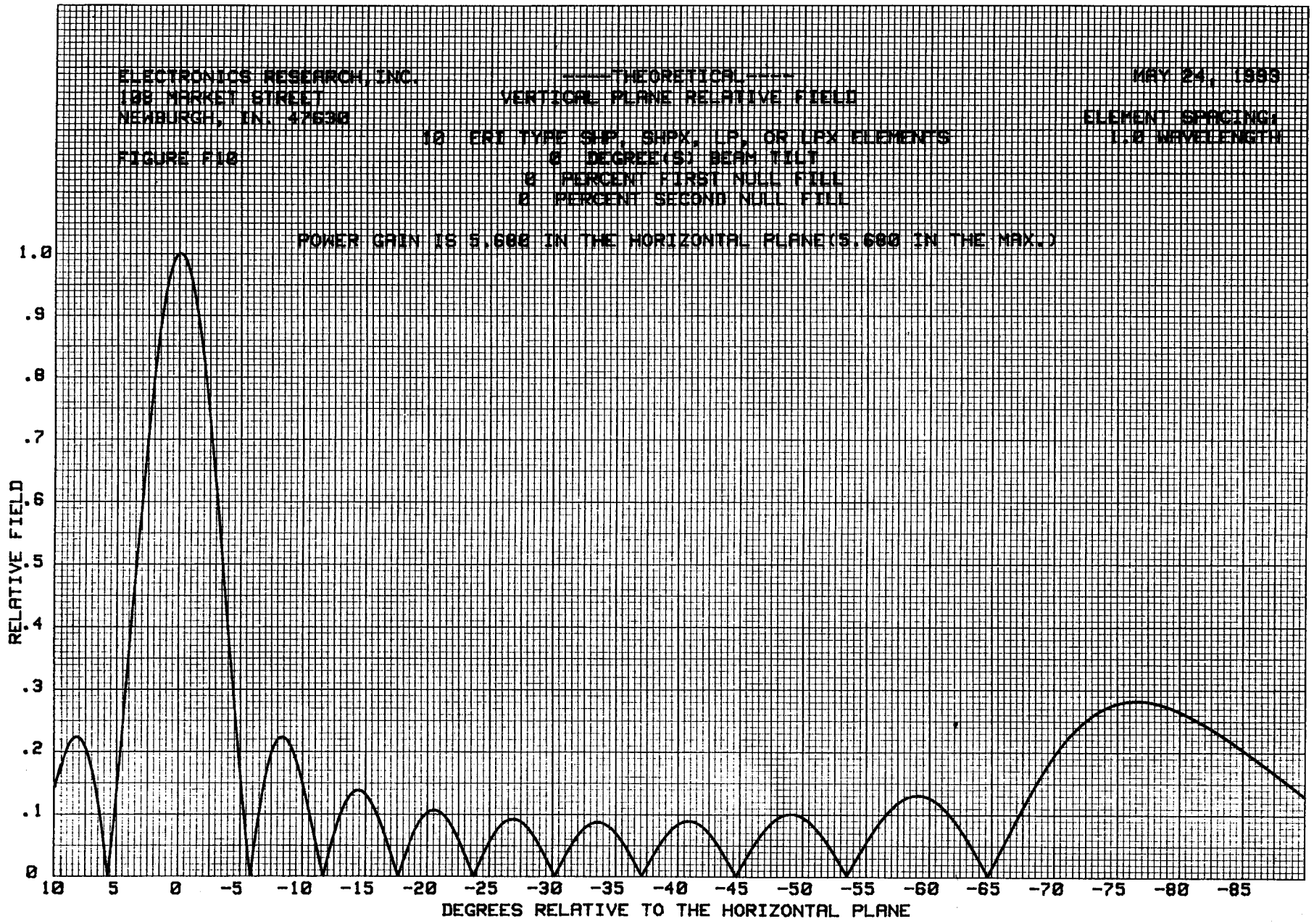

ELECTRONICS RESEARCH,INC.
108 MARKET STREET
NEWBURGH, IN. 47630
FIGURE F10
-----THEORETICAL-----
VERTICAL PLANE RELATIVE FIELD
MAY 24, 1993
10 ERI TYPE SHP, SHPX, LP, OR LPX ELEMENTS
ELEMENT SPACING:
1.0 WAVELENGTH
0 DEGREE(S) BEAM TILT
0 PERCENT FIRST NULL FILL
0 PERCENT SECOND NULL FILL
POWER GAIN IS 5.600 IN THE HORIZONTAL PLANE(5.600 IN THE MAX.)
RELATIVE FIELD
1.0
.9
.8
.7
.6
.5
.4
.3
.2
.1
0
10 5 0 -5 -10 -15 -20 -25 -30 -35 -40 -45 -50 -55 -60 -65 -70 -75 -80 -85
DEGREES RELATIVE TO THE HORIZONTAL PLANE

Figure 4