

# EXHIBIT 11

Western Inspirational Broadcasters, Inc.  
January, 2004  
Minor Change – FM Translator K213BD, ID# 71804  
Lovelock, NV

Western Inspirational Broadcasters, Inc. (WIBI) is supplying the following explanation/Exhibits in support of this application:

WIBI is proposing...

1. This minor change to an IF channel in order to eliminate co-channel interference to and from full-service KKTO, ID# 8331,
2. A change in the transmit antenna from vertical to horizontal polarization, and
3. A change in antenna coordinates and COR (a “correction” of coordinates – there will be no physical change of the transmitter site).

FM Translator K213BD received its original construction permit in 1988, which authorized an effective radiated power of 73 watts (vertical) at HAAT of 691 meters. This power enabled the placement of a 1 mV/m service contour over the city of license.

When the Commission adopted new FM translator power limitations in 1990, K213BD was “grandfathered” with regard to its ERP.

## REQUEST FOR WAIVER

In this application, WIBI is seeking a **WAIVER** of the power limitations as set forth in CFR 74.1235(b)(2) and continued “grandfathering” to retain the currently authorized ERP.

In support of this request, WIBI submits the following:

1. The Commission established a precedent for this request with its approval in 1991 of an application for a change of frequency for FM translator K228DF, ID# 20633, serving Prescott, AZ.

The licensee of K228DF submitted its application on 4/25/1991, and the Commission granted the construction permit on 6/28/1991. The translator was allowed to retain its “grandfathered” power of 77 watts at HAAT of 486 meters.

Application of the parameters of CFR 74.1235(b)(2) at the time would have required a reduction in ERP to less than 20 watts.

The license application for K228DF was subsequently granted on 11/18/1991.

The Commission did not apply the power limitations which were in effect at the time this application was processed.

2. Translator K213BD's "displacement" by KKTO necessitates a frequency change.
3. A reduction in power to 10 watts ERP from its current transmitter site, as required by 74.1235(b)(2) would result in significant reduction of the 1 mV/m service contour such that it would fall approximately nine (9) kilometers short of the city of license.
4. A reduction in power of the magnitude required under 74.1235(b)(2) would jeopardize the operation of three (3) other FM translators;
  - a. K207AA, Imlay, NV which receives over-the-air from K213BD
  - b. K213BG, Winnemucca, NV and K219BT, Orovada, NV which receive their over-the-air inputs from K207AA.

In all likelihood, a reduction to 10 watts ERP at K213BD is likely to introduce significant noise into these downline translators.

5. An alternative site closer to the city of license is not available without Sacrificing the elevation advantage which currently assures reliable, consistent reception of the over-the-air signal from the primary station.
6. A "white area waiver" request is not possible due to the proximity of the KKTO signal.

Because the retention of the currently licensed "grandfathered" power for FM Translator K213BD would assure four (4) remote communities of continued, reliable programming service, and the precedent setting approval a similar application (K228DF, cited above), Western Inspirational Broadcasters, Inc. respectfully requests a **waiver** of the FM translator power limitations and continued "grandfathering" of the currently licensed ERP for FM Translator K213BD.

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Exhibit 12 – Waiver Request of Section 74.1204 and Contour Compliance

Exhibit 12 – Topographic overlay to show absence of population in the contour overlap with KRNG

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