

JOB 106154-AMD  
CITY OF LICENSE Tulare, CA

VER 1

# **CONSOLIDATED ENGINEERING EXHIBIT**

FCC Form 340 - Section VII - FM Engineering

**BROWN BROADCAST SERVICES**  
INCORPORATED  
Michael D. Brown 3740 S.W. Comus St. Portland, Oregon 97219-7418 503-245-6065

# CONSOLIDATED ENGINEERING EXHIBIT

## ENGINEERING STATEMENT

This application is a curative minor amendment to the original application filed by South Valley Peace Center (“SVPC”) for a new NCE station at Tulare, CA (BNPED-20071022ANE). The application was dismissed due to its failure to provide contour protection to the licensed facility of first-adjacent channel KOND, Clovis, CA, on Channel 221B. KOND is short-spaced using the spacing requirements of §73.207, but is within the §73.215 limits. The original proposed 48 dBu interfering contour overlapped KOND’S 54 dBu protected contour.

The original application also neglected to check Section VII, Item 15d, to formally request processing pursuant §73.215. **A Petition for Reconsideration with a request for reinstatement is being filed concurrently with this minor amendment, which corrects these deficiencies.**

Processing pursuant to §73.215 is also required to provide protection to KPSL-FM, Bakersfield, CA on Channel 221A. The original application showed the proper contour protection to KPSL-FM.

This minor amendment eliminates the contour overlap with KOND with a change in the proposed antenna pattern. Processing pursuant to 47 C.F.R. §73.215 is requested with respect to both KPSL-FM and KOND, in Exhibit 18.

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## EXHIBIT 14

### COMMUNITY COVERAGE

The proposed facility complies with the community coverage requirements of §73.515, as shown by the data below and Exhibit 14a. This Rule requires that at least 50% of the area **or** population of the community of license must be covered by a 60dbu signal.

Total Population of Community of License	43,994
Population within 60dbu	29,930
Population within 60dbu %	68.03%
Total Area of Community of License - km <sup>2</sup>	43.2
Area within 60dbu - km <sup>2</sup>	30.2
Area within 60dbu%	69.91%

**BROWN BROADCAST SERVICES**  
INCORPORATED

Michael D. Brown

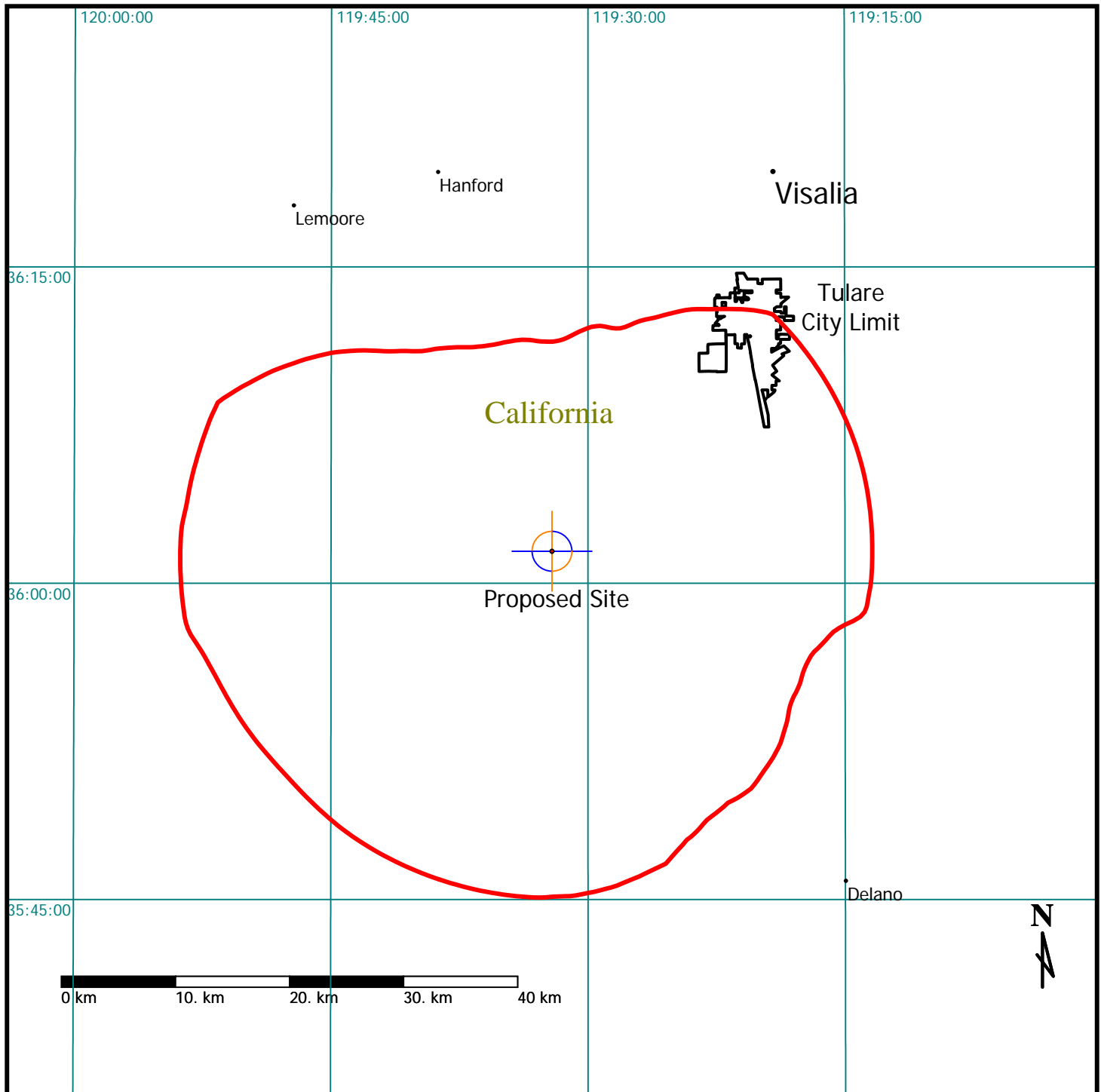
3740 S.W. Comus St. Portland, Oregon 97219-7418

503-245-6065

## Exhibit 14a - Community of License Coverage

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Lat: N36:01:31 Lon: W119:32:06 NAD-27  
Scale: 1:500000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 5:06:11 PM  
Key:  
City Grade  
Protected  
Co-Channel  
1st Adj  
2nd/3rd Adj



# EXHIBIT 16

## CONTOUR OVERLAP PROTECTION TO OTHER RESERVED-BAND STATIONS

The proposed facility is a minor-amendment to the original application filed during the October 2007 filing window. A change in antenna pattern is proposed.

The proposed facility meets the contour overlap requirements of §73.509 with respect to all reserved-band stations, with the exception of the three pending MX applications highlighted in yellow in the table below. The proposed facility and the three MX applications constitute all of the applications in MX group 320. No new mutual exclusivities would be created by this proposal.

Domestic stations considered:

ID	City	St	Chan	CL	Stat	Prefix	ARN	Dist	Min 207	Clear 207
<b>Co-Channel</b>										
20071019ABH	HANFORD	CA	220	A	APP	BNPED	20071019ABH	35.3	143	-107.7
20071019AAS	LOST HILLS	CA	220	A	APP	BNPED	20071019AAS	37.0	143	-106.0
KCSB-FM	SANTA BARBARA	CA	220	B	LIC	BLED	19840928DF	170.8	211	-40.2
KWTD	RIDGECREST	CA	220	B	LIC	BLED	20050621AAO	176.8	211	-34.2
<b>1st Adjacent</b>										
KFHL	WASCO	CA	219	A	LIC	BLED	20050815ADD	73.0	96	-23.0
KNBX	SAN ARDO	CA	219	B	LIC	BLED	20010110AAB	132.5	145	-12.6
<b>2nd &amp; 3rd Adjacent</b>										
20071019ATR	HANFORD	CA	217	A	APP	BNPED	20071019ATR	35.3	48	-12.7

All contour calculations were made using the methods and procedures described in 47 CFR §73.313(c). Areas were calculated using a spline integration in one-degree increments. Population totals were calculated by testing each U.S. Census-defined block-centroid population point in the region with a point-in-polygon method. The population was summed for each point within the polygon using data from the 2000 Census.

## Exhibit 16a - Co-Channel Contour Analysis

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Lat: N36:01:31 Lon: W119:32:06 NAD-27  
Scale: 1:2000000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 5:04:37 PM

### PROPOSED

Protected: 60dbu F(50,50)

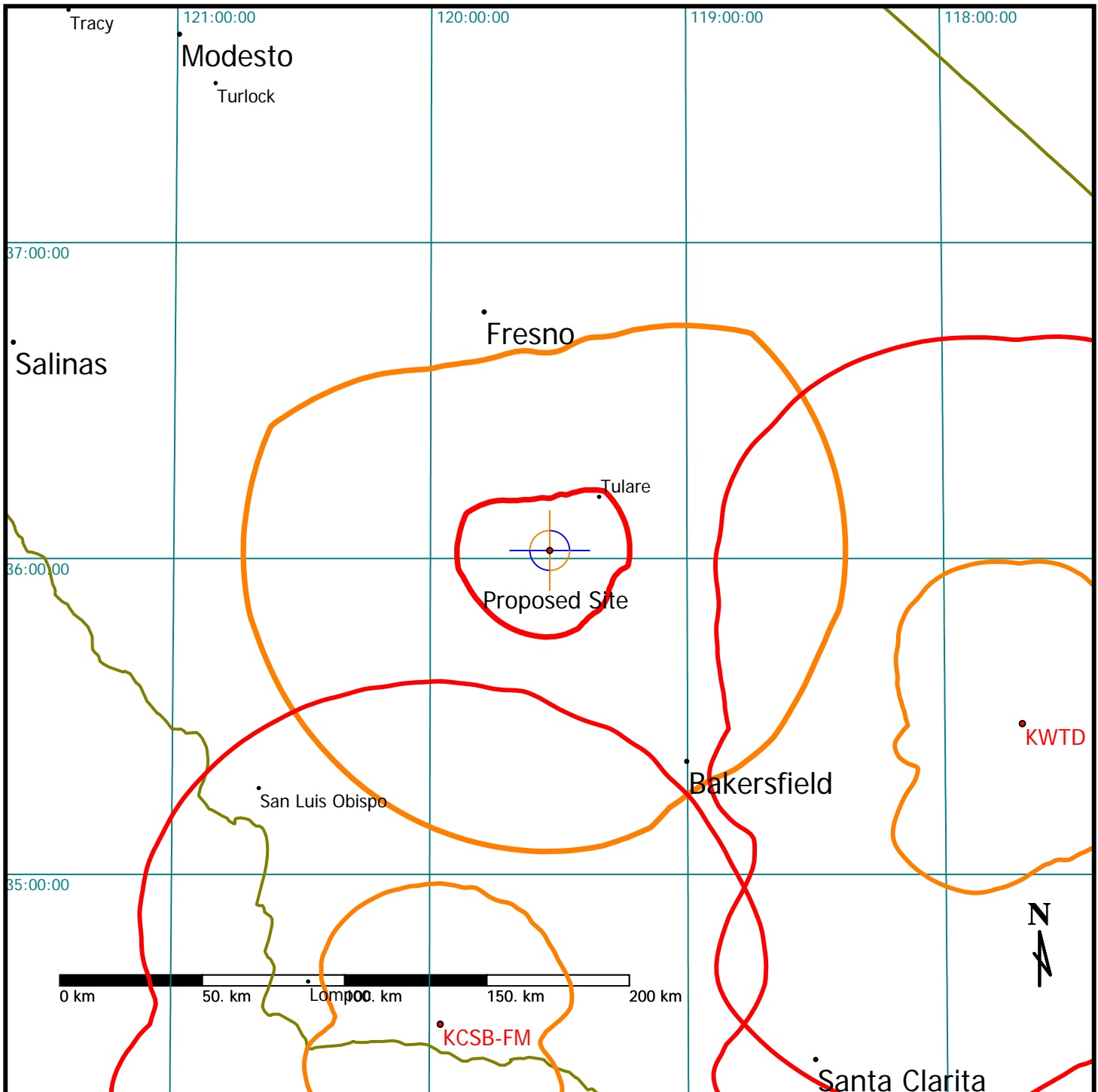
Interfering: 40dbu F(50,10)

### AFFECTED

Protected: 60dbu F(50,50)

Interfering: 40dbu F(50,10)

Not shown: 20071019ABH & 20071019AAS, which remain part of MX Group 320.



## Exhibit 16b - 1st Adjacent-Channel Contour Analysis

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Lat: N36:01:31 Lon: W119:32:06 NAD-27  
Scale: 1:1500000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 5:07:46 PM

### PROPOSED

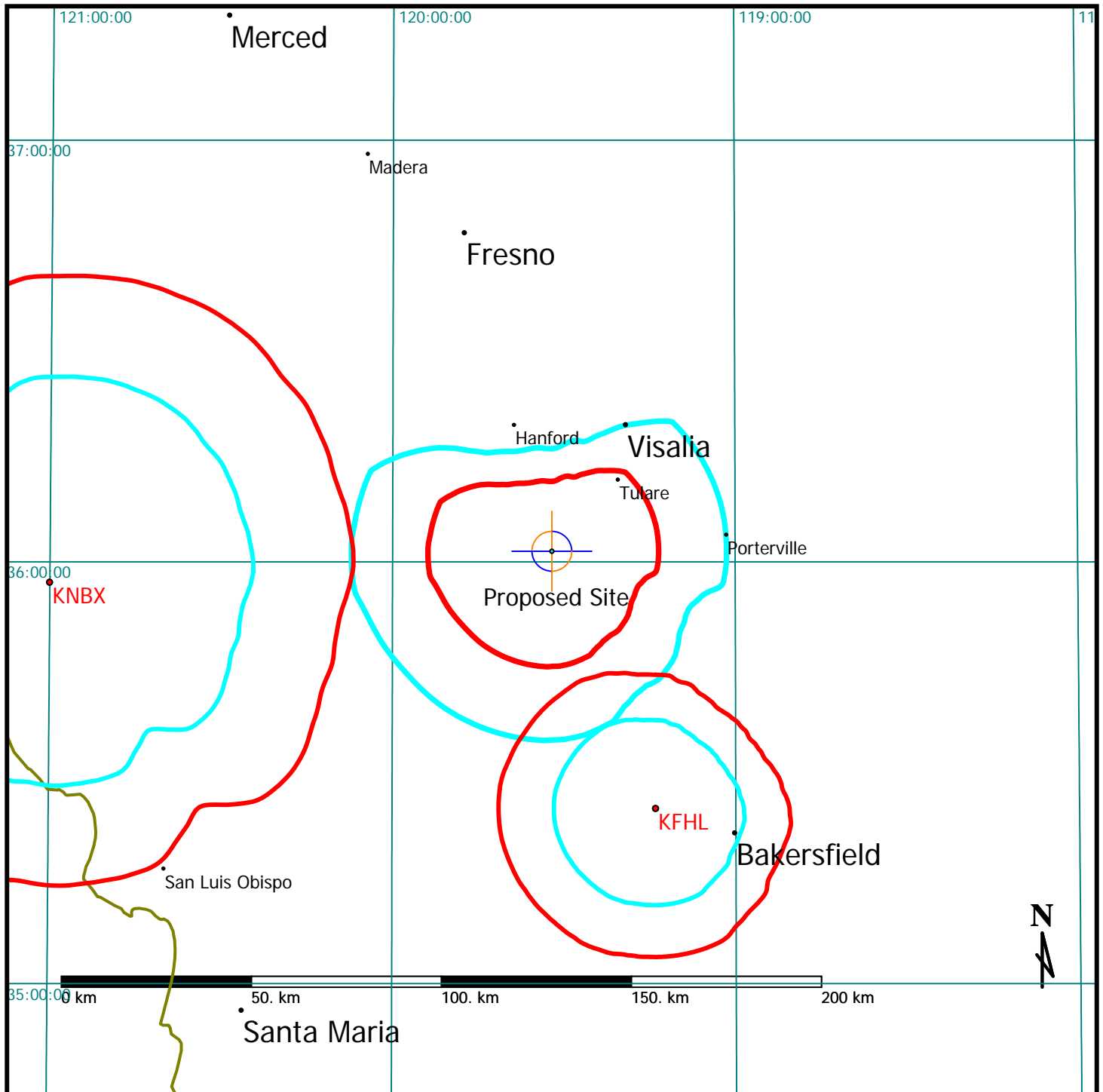
Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)

### AFFECTED

Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)



## Exhibit 16c - 1st Adjacent-Channel Contour Analysis - Detail

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Scale: 1:75000  
Channel: 220 Class: B1

### PROPOSED

Protected: 60dbu F(50,50)

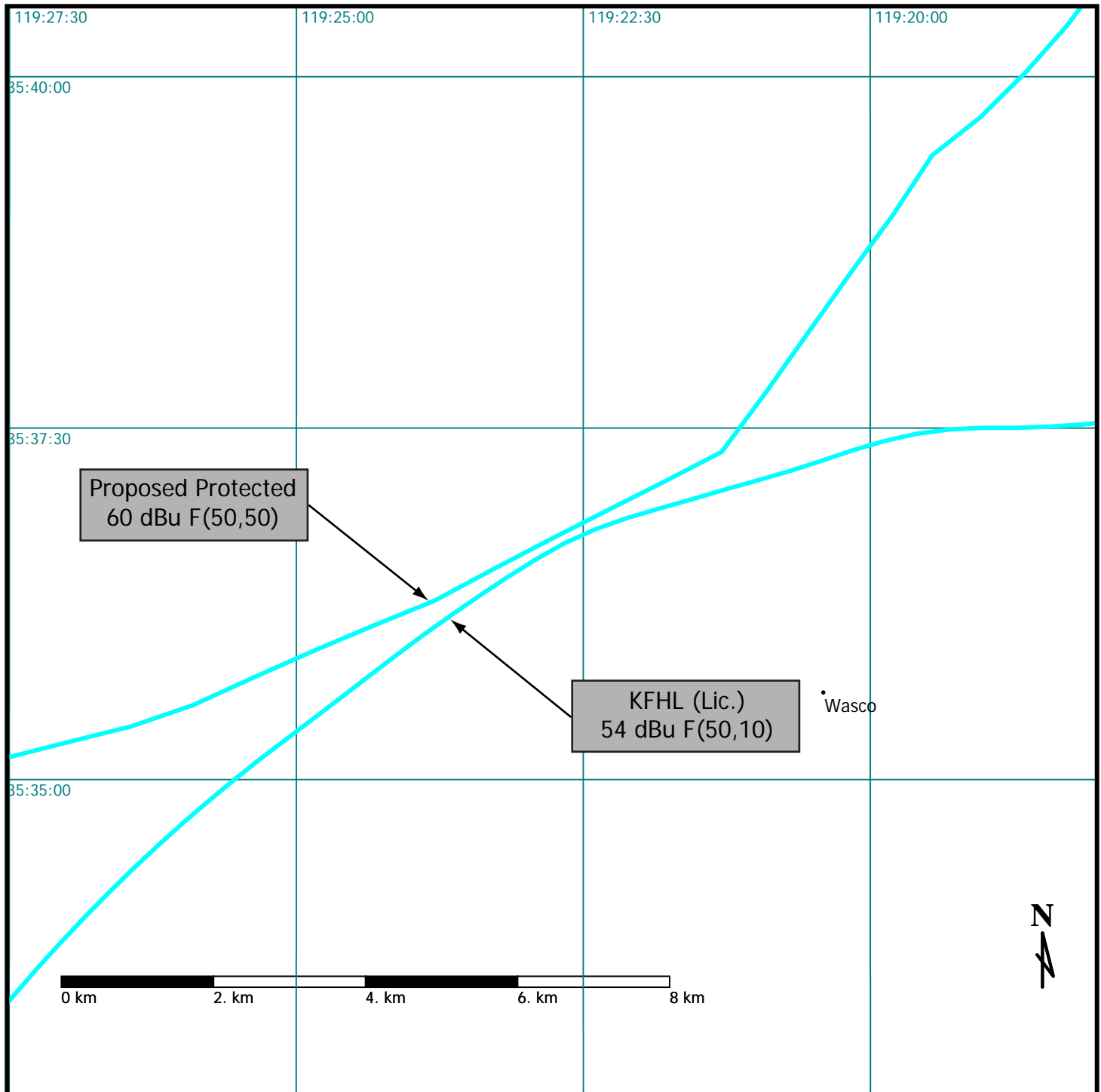
Interfering: 54dbu F(50,10)

### AFFECTED

Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 5:20:56 PM





**Exhibit 16d**

10-12-2009

FCC NGDC 30 Sec Terrain Data

FMOver Analysis

**Proposed 1212038**

Channel = 220B1

Max ERP = 25 kW

RCAMSL = 107 M

N. Lat. 36 01 31.0

W. Lng. 119 32 06.0

Protected

60 dBu

**KFHL BLED20050815ADD**

Channel = 219A

Max ERP = 6 kW

RCAMSL = 179.5 M

N. Lat. 35 24 55.0

W. Lng. 119 14 01.0

Interfering

54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
113.0	025.0000	0035.6	024.3	355.2	006.0000	0065.6	058.5	45.84	
114.0	025.0000	0035.6	024.3	355.0	006.0000	0065.7	058.1	45.97	
115.0	025.0000	0035.5	024.3	354.8	006.0000	0065.7	057.8	46.09	
116.0	025.0000	0035.7	024.4	354.7	006.0000	0065.8	057.4	46.21	
117.0	025.0000	0036.0	024.5	354.5	006.0000	0065.8	057.0	46.34	
118.0	025.0000	0036.3	024.6	354.3	006.0000	0065.8	056.5	46.48	
119.0	025.0000	0036.5	024.6	354.2	006.0000	0065.9	056.2	46.61	
120.0	025.0000	0036.6	024.7	353.9	006.0000	0065.9	055.8	46.73	
121.0	025.0000	0036.7	024.7	353.7	006.0000	0065.9	055.4	46.85	
122.0	025.0000	0036.9	024.7	353.5	006.0000	0066.0	055.0	46.98	
123.0	025.0000	0037.2	024.8	353.2	006.0000	0066.0	054.6	47.11	
124.0	025.0000	0037.8	025.0	353.1	006.0000	0066.1	054.2	47.26	
125.0	025.0000	0038.5	025.2	352.9	006.0000	0066.1	053.7	47.41	
126.0	025.0000	0039.1	025.4	352.8	006.0000	0066.1	053.3	47.57	
127.0	025.0000	0039.7	025.6	352.6	006.0000	0066.2	052.8	47.72	
128.0	025.0000	0040.2	025.7	352.3	006.0000	0066.3	052.4	47.87	
129.0	025.0000	0040.8	025.9	352.1	006.0000	0066.4	052.0	48.02	
130.0	025.0000	0041.5	026.1	351.9	006.0000	0066.5	051.5	48.18	
131.0	024.6512	0042.1	026.2	351.6	006.0000	0066.6	051.1	48.32	
132.0	024.3049	0042.8	026.3	351.3	006.0000	0066.8	050.8	48.47	
133.0	024.0100	0043.4	026.4	351.0	006.0000	0067.0	050.4	48.61	
134.0	023.6682	0044.0	026.5	350.6	006.0000	0067.2	050.0	48.74	
135.0	023.3289	0044.6	026.6	350.2	006.0000	0067.4	049.7	48.87	
136.0	022.9920	0045.2	026.7	349.8	006.0000	0067.7	049.4	49.01	
137.0	022.6576	0045.9	026.8	349.4	006.0000	0068.0	049.0	49.15	
138.0	022.3729	0046.6	026.9	349.0	006.0000	0068.4	048.7	49.30	
139.0	022.0430	0047.3	027.0	348.6	006.0000	0068.8	048.4	49.44	
140.0	021.7156	0047.9	027.1	348.2	006.0000	0069.1	048.1	49.58	
141.0	021.1600	0048.4	027.1	347.7	006.0000	0069.5	047.9	49.68	
142.0	020.6116	0048.9	027.0	347.1	006.0000	0069.8	047.7	49.77	
143.0	020.1152	0049.3	027.0	346.6	006.0000	0070.1	047.5	49.85	
144.0	019.5806	0049.7	026.9	346.1	006.0000	0070.3	047.4	49.92	
145.0	019.0532	0050.0	026.8	345.5	006.0000	0070.6	047.3	49.98	
146.0	019.0096	0050.3	026.9	345.0	006.0000	0070.8	047.1	50.08	
147.0	018.9660	0050.6	027.0	344.5	006.0000	0071.1	046.9	50.18	
148.0	018.9225	0050.8	027.0	343.9	006.0000	0071.5	046.7	50.27	
149.0	018.8790	0051.1	027.1	343.4	006.0000	0071.8	046.5	50.37	
150.0	018.8356	0051.4	027.1	342.8	006.0000	0072.3	046.4	50.47	
151.0	019.0096	0051.8	027.3	342.3	006.0000	0072.8	046.1	50.62	
152.0	019.1844	0052.4	027.5	341.8	006.0000	0073.3	045.8	50.77	
153.0	019.3160	0052.9	027.7	341.2	006.0000	0073.8	045.6	50.90	

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
154.0	019.4922	0053.3	027.8	340.6	006.0000	0074.2	045.4	51.02	
155.0	019.6692	0053.5	027.9	340.0	006.0000	0074.5	045.2	51.10	
156.0	020.3852	0053.5	028.1	339.4	006.0000	0074.8	044.9	51.23	
157.0	021.1140	0053.5	028.4	338.8	006.0000	0075.0	044.7	51.33	
158.0	021.8556	0053.6	028.6	338.2	006.0000	0075.1	044.5	51.44	
159.0	022.6100	0053.7	028.9	337.5	006.0000	0075.3	044.2	51.55	
160.0	023.3772	0053.9	029.1	336.9	006.0000	0075.5	044.0	51.66	
161.0	023.5225	0054.0	029.2	336.2	006.0000	0075.7	043.9	51.69	
162.0	023.7169	0054.0	029.2	335.5	006.0000	0076.0	043.9	51.72	
163.0	023.8632	0054.1	029.3	334.9	006.0000	0076.3	043.9	51.76	
164.0	024.0100	0054.3	029.4	334.2	006.0000	0076.7	043.9	51.79	
165.0	024.2064	0054.4	029.5	333.5	006.0000	0077.0	043.9	51.83	
166.0	024.3542	0054.5	029.5	332.8	006.0000	0077.4	044.0	51.85	
167.0	024.5025	0054.6	029.6	332.2	006.0000	0077.8	044.0	51.87	
168.0	024.6512	0054.8	029.7	331.5	006.0000	0078.2	044.1	51.89	
169.0	024.8502	0055.0	029.8	330.8	006.0000	0078.6	044.1	51.91	
170.0	025.0000	0055.1	029.9	330.1	006.0000	0079.0	044.2	51.91	
171.0	025.0000	0055.3	029.9	329.5	006.0000	0079.2	044.4	51.88	
172.0	025.0000	0055.5	030.0	328.8	006.0000	0079.4	044.5	51.84	
173.0	025.0000	0055.7	030.0	328.2	006.0000	0079.5	044.7	51.78	
174.0	025.0000	0055.9	030.1	327.6	006.0000	0079.5	044.9	51.71	
175.0	025.0000	0056.1	030.1	327.0	006.0000	0079.5	045.1	51.65	
176.0	025.0000	0056.3	030.2	326.3	006.0000	0079.5	045.3	51.57	
177.0	025.0000	0056.5	030.2	325.7	006.0000	0079.5	045.5	51.48	
178.0	025.0000	0056.5	030.2	325.2	006.0000	0079.5	045.8	51.38	
179.0	025.0000	0056.5	030.2	324.6	006.0000	0079.5	046.1	51.28	
180.0	025.0000	0056.6	030.2	324.1	006.0000	0079.5	046.4	51.18	
181.0	025.0000	0056.8	030.3	323.5	006.0000	0079.5	046.6	51.08	
182.0	025.0000	0057.0	030.4	323.0	006.0000	0079.5	046.9	50.98	
183.0	025.0000	0057.1	030.4	322.5	006.0000	0079.5	047.3	50.86	
184.0	025.0000	0057.1	030.4	322.0	006.0000	0079.5	047.6	50.74	
185.0	025.0000	0057.1	030.4	321.5	006.0000	0079.6	048.0	50.62	
186.0	025.0000	0057.1	030.4	321.1	006.0000	0079.6	048.3	50.50	
187.0	025.0000	0057.2	030.4	320.6	006.0000	0079.7	048.7	50.38	
188.0	025.0000	0057.2	030.4	320.2	006.0000	0079.8	049.1	50.25	
189.0	025.0000	0057.2	030.4	319.8	006.0000	0079.8	049.5	50.12	
190.0	025.0000	0057.2	030.4	319.4	006.0000	0079.9	049.9	49.99	
191.0	025.0000	0057.2	030.4	319.0	006.0000	0080.0	050.3	49.85	
192.0	025.0000	0057.2	030.4	318.7	006.0000	0080.1	050.7	49.71	
193.0	025.0000	0057.2	030.4	318.3	006.0000	0080.2	051.1	49.56	
194.0	025.0000	0057.2	030.4	318.0	006.0000	0080.3	051.6	49.42	
195.0	025.0000	0057.2	030.4	317.7	006.0000	0080.3	052.0	49.26	
196.0	025.0000	0057.2	030.4	317.4	006.0000	0080.4	052.5	49.11	
197.0	025.0000	0057.3	030.4	317.1	006.0000	0080.5	052.9	48.96	
198.0	025.0000	0057.3	030.4	316.8	006.0000	0080.5	053.4	48.80	
199.0	025.0000	0057.3	030.4	316.5	006.0000	0080.6	053.8	48.64	
200.0	025.0000	0057.3	030.4	316.3	006.0000	0080.6	054.3	48.47	
201.0	025.0000	0057.3	030.4	316.0	006.0000	0080.7	054.8	48.31	
202.0	025.0000	0057.3	030.4	315.8	006.0000	0080.7	055.3	48.14	
203.0	025.0000	0057.3	030.4	315.6	006.0000	0080.8	055.8	47.97	

10-12-2009 FCC NGDC 30 Sec Terrain Data

**KFHL BLED20050815ADD**

Channel = 219A  
 Max ERP = 6 kW  
 RCAMSL = 179.5 M  
 N. Lat. 35 24 55.0  
 W. Lng. 119 14 01.0  
 Protected  
 60 dBu

**Proposed 1212038**

Channel = 220B1  
 Max ERP = 25 kW  
 RCAMSL = 107 M  
 N. Lat. 36 01 31.0  
 W. Lng. 119 32 06.0  
 Interfering  
 54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
293.0	006.0000	0085.3	026.3	176.9	025.0000	0056.5	057.6	51.51	
294.0	006.0000	0085.1	026.2	176.7	025.0000	0056.5	057.2	51.63	
295.0	006.0000	0084.8	026.2	176.4	025.0000	0056.4	056.8	51.74	
296.0	006.0000	0084.5	026.1	176.2	025.0000	0056.4	056.5	51.85	
297.0	006.0000	0084.1	026.1	175.9	025.0000	0056.3	056.1	51.96	
298.0	006.0000	0083.7	026.0	175.6	025.0000	0056.2	055.7	52.06	
299.0	006.0000	0083.4	026.0	175.3	025.0000	0056.2	055.4	52.16	
300.0	006.0000	0083.1	025.9	175.0	025.0000	0056.1	055.0	52.26	
301.0	006.0000	0082.9	025.9	174.7	025.0000	0056.0	054.7	52.36	
302.0	006.0000	0082.8	025.9	174.4	025.0000	0056.0	054.3	52.46	
303.0	006.0000	0082.7	025.9	174.1	025.0000	0055.9	054.0	52.56	
304.0	006.0000	0082.6	025.8	173.8	025.0000	0055.8	053.6	52.65	
305.0	006.0000	0082.4	025.8	173.4	025.0000	0055.8	053.3	52.75	
306.0	006.0000	0082.3	025.8	173.1	025.0000	0055.8	053.0	52.85	
307.0	006.0000	0082.2	025.8	172.7	025.0000	0055.7	052.7	52.94	
308.0	006.0000	0082.0	025.8	172.4	025.0000	0055.6	052.4	53.02	
309.0	006.0000	0081.9	025.8	172.0	025.0000	0055.5	052.1	53.10	
310.0	006.0000	0081.7	025.7	171.6	025.0000	0055.4	051.8	53.18	
311.0	006.0000	0081.6	025.7	171.2	025.0000	0055.3	051.5	53.26	
312.0	006.0000	0081.4	025.7	170.8	025.0000	0055.3	051.2	53.33	
313.0	006.0000	0081.3	025.7	170.4	025.0000	0055.2	051.0	53.40	
314.0	006.0000	0081.1	025.6	170.0	025.0000	0055.1	050.7	53.47	
315.0	006.0000	0080.9	025.6	169.6	024.9358	0055.1	050.5	53.53	
316.0	006.0000	0080.7	025.6	169.1	024.8700	0055.1	050.3	53.58	
317.0	006.0000	0080.5	025.5	168.7	024.7872	0055.0	050.1	53.62	
318.0	006.0000	0080.3	025.5	168.2	024.6964	0054.9	049.9	53.65	
319.0	006.0000	0080.0	025.5	167.8	024.6159	0054.8	049.7	53.69	
320.0	006.0000	0079.8	025.4	167.3	024.5458	0054.7	049.5	53.72	
321.0	006.0000	0079.6	025.4	166.8	024.4753	0054.6	049.3	53.75	
322.0	006.0000	0079.5	025.4	166.3	024.4050	0054.5	049.1	53.78	
323.0	006.0000	0079.5	025.4	165.9	024.3345	0054.5	049.0	53.82	
324.0	006.0000	0079.5	025.4	165.4	024.2633	0054.5	048.8	53.85	
325.0	006.0000	0079.5	025.4	164.9	024.1863	0054.4	048.6	53.88	
326.0	006.0000	0079.5	025.4	164.4	024.0892	0054.3	048.5	53.90	
327.0	006.0000	0079.5	025.4	163.9	023.9960	0054.3	048.4	53.91	
328.0	006.0000	0079.5	025.4	163.4	023.9216	0054.2	048.2	53.92	
329.0	006.0000	0079.4	025.4	162.9	023.8461	0054.1	048.1	53.92	
330.0	006.0000	0079.0	025.3	162.4	023.7692	0054.0	048.1	53.92	
331.0	006.0000	0078.5	025.3	161.8	023.6826	0054.0	048.1	53.90	
332.0	006.0000	0077.9	025.2	161.3	023.5784	0054.0	048.1	53.87	
333.0	006.0000	0077.3	025.1	160.8	023.4869	0053.9	048.1	53.85	

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
334.0	006.0000	0076.7	025.0	160.2	023.4102	0053.9	048.1	53.82	
335.0	006.0000	0076.3	024.9	159.7	023.1481	0053.8	048.2	53.76	
336.0	006.0000	0075.8	024.8	159.2	022.7486	0053.8	048.2	53.66	
337.0	006.0000	0075.4	024.8	158.7	022.3555	0053.7	048.2	53.56	
338.0	006.0000	0075.2	024.8	158.2	021.9684	0053.6	048.3	53.47	
339.0	006.0000	0074.9	024.7	157.6	021.5860	0053.5	048.3	53.37	
340.0	006.0000	0074.5	024.7	157.1	021.2102	0053.5	048.4	53.27	
341.0	006.0000	0073.9	024.6	156.6	020.8429	0053.5	048.5	53.16	
342.0	006.0000	0073.1	024.4	156.1	020.4864	0053.5	048.7	53.04	
343.0	006.0000	0072.2	024.3	155.7	020.1414	0053.5	048.8	52.91	
344.0	006.0000	0071.4	024.2	155.2	019.8033	0053.5	049.0	52.78	
345.0	006.0000	0070.8	024.1	154.7	019.6198	0053.4	049.2	52.69	
346.0	006.0000	0070.4	024.0	154.3	019.5374	0053.4	049.3	52.62	
347.0	006.0000	0069.9	024.0	153.8	019.4566	0053.3	049.5	52.53	
348.0	006.0000	0069.2	023.9	153.4	019.3789	0053.1	049.7	52.44	
349.0	006.0000	0068.4	023.7	152.9	019.3072	0052.9	049.9	52.33	
350.0	006.0000	0067.6	023.6	152.5	019.2529	0052.7	050.1	52.22	
351.0	006.0000	0067.0	023.5	152.1	019.1985	0052.5	050.4	52.12	
352.0	006.0000	0066.4	023.4	151.7	019.1322	0052.2	050.6	52.00	
353.0	006.0000	0066.1	023.4	151.3	019.0603	0052.0	050.8	51.90	
354.0	006.0000	0065.9	023.4	150.9	018.9881	0051.8	050.9	51.80	
355.0	006.0000	0065.7	023.3	150.5	018.9174	0051.6	051.1	51.71	
356.0	006.0000	0065.5	023.3	150.1	018.8485	0051.4	051.3	51.61	
357.0	006.0000	0065.3	023.3	149.7	018.8495	0051.3	051.5	51.53	
358.0	006.0000	0065.2	023.3	149.3	018.8663	0051.1	051.8	51.46	
359.0	006.0000	0065.1	023.2	148.9	018.8828	0051.0	052.0	51.39	
000.0	006.0000	0064.9	023.2	148.5	018.8989	0051.0	052.2	51.31	
001.0	006.0000	0064.9	023.2	148.2	018.9152	0050.9	052.4	51.24	
002.0	006.0000	0064.9	023.2	147.8	018.9313	0050.8	052.6	51.17	
003.0	006.0000	0064.9	023.2	147.4	018.9471	0050.7	052.9	51.10	
004.0	006.0000	0064.9	023.2	147.1	018.9625	0050.6	053.1	51.02	
005.0	006.0000	0064.9	023.2	146.7	018.9777	0050.5	053.3	50.94	
006.0	006.0000	0064.8	023.2	146.4	018.9919	0050.5	053.6	50.85	
007.0	006.0000	0064.0	023.1	146.2	019.0027	0050.4	054.0	50.74	
008.0	006.0000	0062.8	022.9	146.0	019.0110	0050.3	054.4	50.62	
009.0	006.0000	0061.7	022.7	145.8	019.0190	0050.3	054.8	50.50	
010.0	006.0000	0061.0	022.6	145.6	019.0285	0050.2	055.1	50.39	
011.0	006.0000	0060.5	022.5	145.3	019.0391	0050.1	055.4	50.29	
012.0	006.0000	0060.4	022.5	145.1	019.0509	0050.0	055.7	50.20	
013.0	006.0000	0060.5	022.5	144.8	019.1720	0049.9	056.0	50.14	
014.0	006.0000	0060.6	022.5	144.5	019.3147	0049.8	056.3	50.08	
015.0	006.0000	0060.4	022.5	144.3	019.4379	0049.8	056.6	50.00	
016.0	006.0000	0059.9	022.4	144.1	019.5401	0049.7	057.0	49.92	
017.0	006.0000	0059.2	022.3	143.9	019.6180	0049.6	057.4	49.82	
018.0	006.0000	0058.2	022.2	143.8	019.6704	0049.6	057.8	49.72	
019.0	006.0000	0057.1	022.0	143.8	019.7060	0049.6	058.2	49.60	
020.0	006.0000	0056.1	021.8	143.7	019.7411	0049.6	058.6	49.49	
021.0	006.0000	0055.5	021.7	143.6	019.7997	0049.5	059.0	49.40	
022.0	006.0000	0055.2	021.6	143.4	019.8808	0049.5	059.3	49.31	
023.0	006.0000	0054.9	021.6	143.3	019.9599	0049.4	059.7	49.23	

**EXHIBIT 18**  
**§73.215 “SHORT-SPACED” CONTOUR PROTECTION**

KOND and KPSL-FM are short spaced using §73.207, but are within the §73.215 spacing limits.

ID	City	St	Chan	CL	Stat	Prefix	ARN	Dist	Min 207	Clear 207	Min 215	Clear 215
<b>1st Adj.</b>												
KOND	CLOVIS	CA	221	B	LIC	BLH	20010821AAG	123.0	145	-22.0	114	9.0
KPSL-FM	BAKERSFIELD	CA	221	A	LIC	BLH	19970714KA	83.6	96	-12.4	72	11.6

Required contour protection to KOND is shown by the map in Exhibit 18a. Processing pursuant to §73.215 is hereby requested, with respect to KOND.

Required contour protection to KPSL-FM is shown by the map in Exhibit 18b. Processing pursuant to §73.215 is hereby requested, with respect to KPSL-FM.

## Exhibit 18a - 1st Adjacent-Channel Contour Analysis vs. KOND

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Lat: N36:01:31 Lon: W119:32:06 NAD-27  
Scale: 1:1500000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/12/2009 8:48:46 PM

### PROPOSED

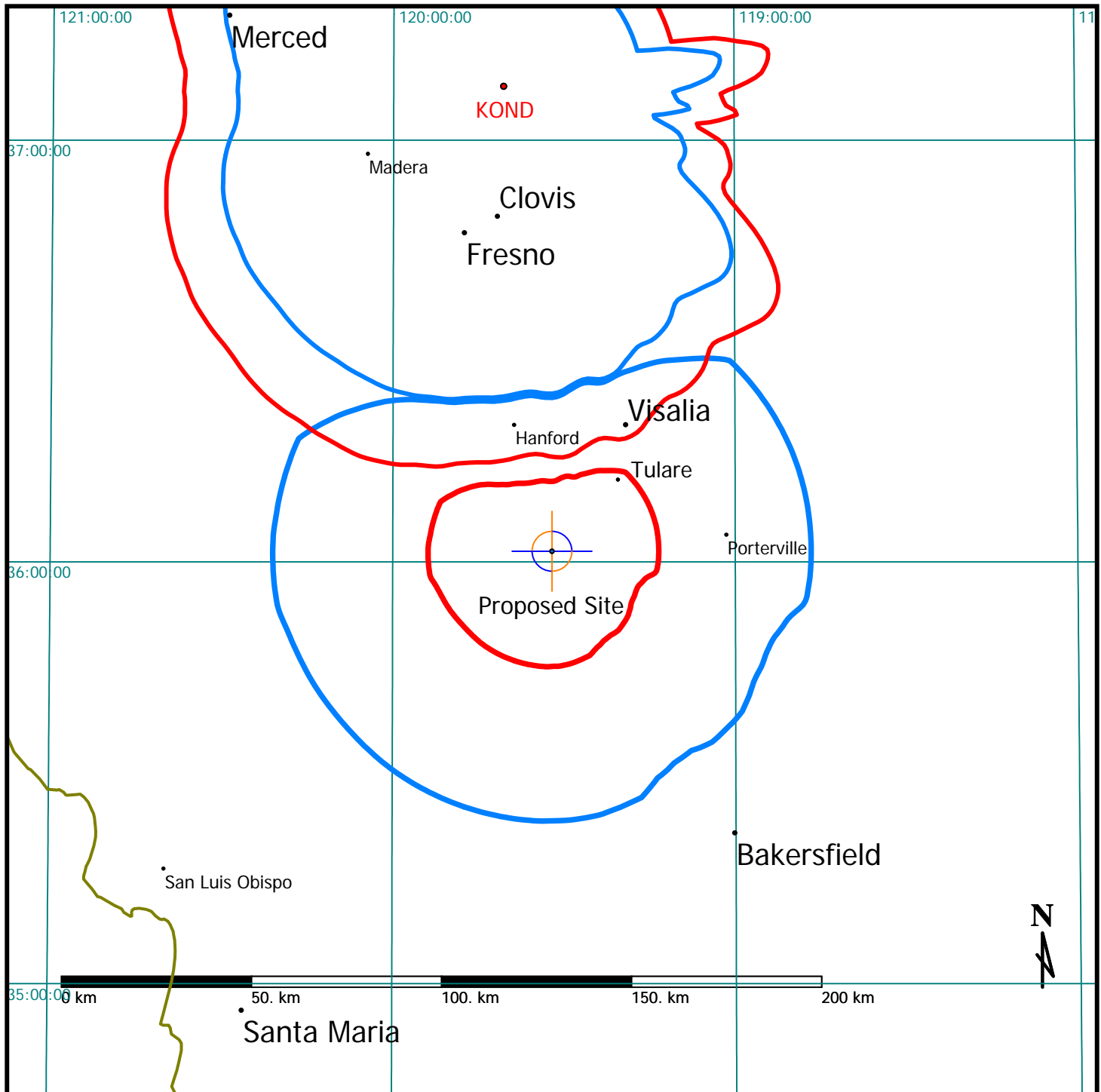
Protected: 60dbu F(50,50)

Interfering: 48dbu F(50,10)

### AFFECTED

Protected: 54dbu F(50,50)

Interfering: 54dbu F(50,10)



## Exhibit 18b - 1st Adjacent-Channel Contour Analysis vs. KONF - Detail

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Scale: 1:150000  
Channel: 220 Class: B1

### PROPOSED

Protected: 60dbu F(50,50)

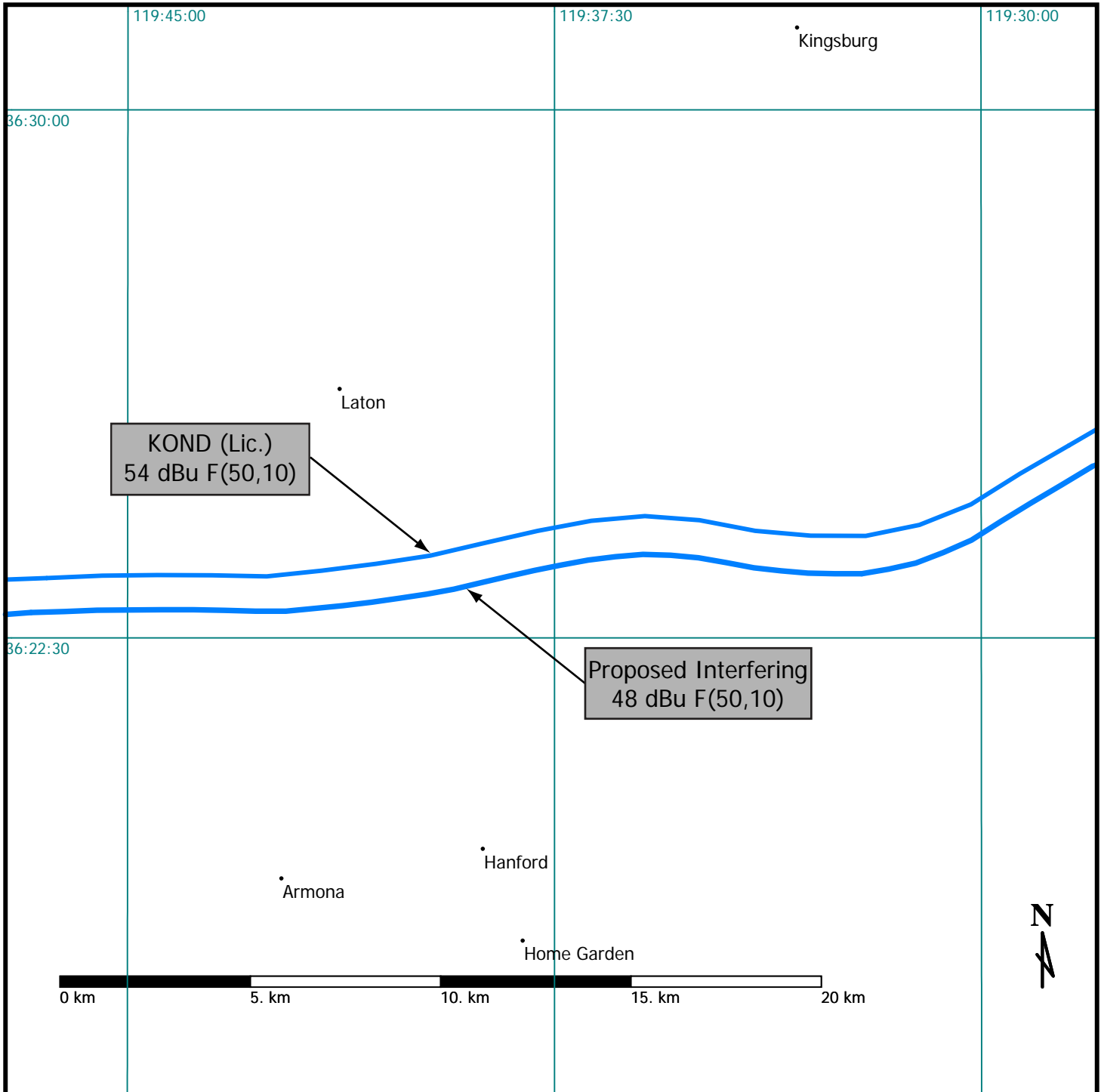
Interfering: 48dbu F(50,10)

### AFFECTED

Protected: 54dbu F(50,50)

Interfering: 54dbu F(50,10)

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 6:21:07 PM



**Exhibit 18c**

10-12-2009

FCC NGDC 30 Sec Terrain Data

FMOver Analysis

**Proposed 1212038**

Channel = 220B1

Max ERP = 25 kW

RCAMSL = 107 M

N. Lat. 36 01 31.0

W. Lng. 119 32 06.0

Protected

60 dBu

**KOND BLH20010821AAG**

Channel = 221B

Max ERP = 50 kW

RCAMSL = 601 M

N. Lat. 37 07 40.0

W. Lng. 119 40 38.0

Interfering

54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
309.0	012.6025	0062.6	027.0	184.5	050.0000	0339.3	105.9	52.11	
310.0	012.0409	0062.2	026.7	184.2	050.0000	0338.9	105.7	52.15	
311.0	011.4921	0061.8	026.3	183.9	050.0000	0338.5	105.5	52.18	
312.0	010.9892	0061.4	026.0	183.6	050.0000	0338.0	105.4	52.21	
313.0	010.4976	0060.7	025.6	183.3	050.0000	0337.7	105.2	52.23	
314.0	010.0172	0059.9	025.2	183.0	050.0000	0337.7	105.2	52.25	
315.0	009.5790	0059.1	024.8	182.6	050.0000	0337.8	105.1	52.27	
316.0	009.1506	0058.4	024.4	182.3	050.0000	0337.7	105.0	52.29	
317.0	008.7320	0057.7	024.1	182.0	050.0000	0337.4	105.0	52.28	
318.0	008.3232	0056.9	023.6	181.7	050.0000	0336.6	105.0	52.25	
319.0	007.9524	0056.1	023.3	181.4	050.0000	0335.8	105.0	52.22	
320.0	007.5900	0055.4	022.9	181.1	050.0000	0334.9	105.0	52.18	
321.0	007.2630	0054.8	022.5	180.8	050.0000	0334.2	105.0	52.15	
322.0	006.9432	0054.5	022.2	180.5	050.0000	0333.4	105.0	52.13	
323.0	006.6306	0054.3	022.0	180.3	050.0000	0332.7	105.0	52.11	
324.0	006.3252	0054.1	021.7	180.0	050.0000	0332.0	105.0	52.08	
325.0	006.0516	0053.8	021.4	179.8	050.0000	0331.3	105.0	52.05	
326.0	005.8322	0053.4	021.1	179.5	050.0000	0330.6	105.0	52.02	
327.0	005.6644	0053.0	020.9	179.3	050.0000	0329.9	105.0	52.00	
328.0	005.5460	0052.7	020.7	179.1	050.0000	0329.2	105.0	51.99	
329.0	005.4289	0052.5	020.6	178.8	050.0000	0328.5	104.9	51.98	
330.0	005.3130	0052.4	020.5	178.6	050.0000	0327.5	104.9	51.96	
331.0	005.1756	0052.3	020.3	178.4	050.0000	0326.5	104.8	51.93	
332.0	005.0400	0052.1	020.2	178.2	050.0000	0325.7	104.8	51.91	
333.0	004.9284	0051.9	020.0	178.0	050.0000	0324.9	104.8	51.89	
334.0	004.8400	0051.7	019.9	177.8	050.0000	0324.2	104.8	51.86	
335.0	004.7742	0051.3	019.7	177.6	050.0000	0323.5	104.8	51.84	
336.0	004.7089	0050.9	019.6	177.4	050.0000	0322.7	104.8	51.81	
337.0	004.6440	0050.5	019.4	177.2	050.0000	0321.9	104.8	51.78	
338.0	004.5796	0050.1	019.3	177.0	050.0000	0321.2	104.8	51.74	
339.0	004.5369	0049.8	019.2	176.8	050.0000	0320.4	104.8	51.72	
340.0	004.5156	0049.5	019.1	176.6	050.0000	0319.7	104.8	51.69	
341.0	004.4944	0049.2	019.0	176.4	050.0000	0319.1	104.8	51.68	
342.0	004.4944	0048.9	018.9	176.2	050.0000	0318.9	104.8	51.68	
343.0	004.4944	0048.7	018.9	176.0	050.0000	0318.8	104.7	51.68	
344.0	004.4944	0048.4	018.8	175.9	050.0000	0318.7	104.7	51.69	
345.0	004.5156	0048.2	018.8	175.7	050.0000	0318.7	104.7	51.70	
346.0	004.5582	0047.9	018.8	175.5	050.0000	0318.6	104.6	51.71	
347.0	004.6010	0047.7	018.8	175.3	050.0000	0318.6	104.6	51.73	
348.0	004.6225	0047.6	018.8	175.1	050.0000	0318.6	104.5	51.73	



Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
349.0	004.6440	0047.4	018.8	175.0	050.0000	0318.6	104.5	51.74	
350.0	004.6872	0047.3	018.8	174.8	050.0000	0318.8	104.5	51.76	
351.0	004.6872	0047.1	018.8	174.6	050.0000	0319.2	104.5	51.78	
352.0	004.6872	0047.0	018.7	174.4	050.0000	0319.7	104.5	51.80	
353.0	004.6440	0047.0	018.7	174.2	050.0000	0320.5	104.5	51.81	
354.0	004.6010	0047.0	018.6	174.1	050.0000	0321.5	104.6	51.83	
355.0	004.5369	0047.0	018.6	173.9	050.0000	0322.6	104.6	51.85	
356.0	004.4521	0047.0	018.5	173.7	050.0000	0323.7	104.7	51.86	
357.0	004.4100	0047.0	018.4	173.5	050.0000	0324.7	104.8	51.88	
358.0	004.3890	0047.0	018.4	173.4	050.0000	0325.8	104.8	51.90	
359.0	004.3681	0047.0	018.4	173.2	050.0000	0326.7	104.9	51.92	
000.0	004.3681	0047.0	018.4	173.0	050.0000	0327.6	104.9	51.94	
001.0	004.4100	0047.0	018.4	172.8	050.0000	0328.4	104.9	51.97	
002.0	004.4732	0047.0	018.5	172.7	050.0000	0329.1	104.9	52.00	
003.0	004.5796	0047.0	018.6	172.5	050.0000	0329.8	104.9	52.04	
004.0	004.7306	0047.0	018.8	172.3	050.0000	0330.5	104.8	52.10	
005.0	004.9284	0047.0	019.0	172.1	050.0000	0331.3	104.6	52.17	
006.0	005.1529	0047.0	019.2	171.9	050.0000	0332.2	104.5	52.24	
007.0	005.3824	0047.0	019.4	171.7	050.0000	0332.9	104.4	52.30	
008.0	005.6169	0047.0	019.6	171.5	050.0000	0333.6	104.3	52.36	
009.0	005.8564	0047.0	019.8	171.2	050.0000	0334.1	104.2	52.41	
010.0	006.0762	0047.0	020.0	171.0	050.0000	0334.5	104.1	52.44	
011.0	006.2250	0047.0	020.1	170.8	050.0000	0334.7	104.1	52.44	
012.0	006.3756	0046.9	020.2	170.6	050.0000	0334.6	104.2	52.43	
013.0	006.5280	0046.4	020.2	170.4	050.0000	0334.5	104.3	52.39	
014.0	006.7340	0045.7	020.2	170.3	050.0000	0334.2	104.4	52.34	
015.0	006.9960	0045.0	020.2	170.1	050.0000	0333.8	104.5	52.29	
016.0	007.2900	0044.4	020.3	169.9	050.0000	0333.4	104.6	52.24	
017.0	007.5900	0044.1	020.4	169.7	050.0000	0332.8	104.7	52.20	
018.0	007.9524	0044.1	020.7	169.4	050.0000	0331.9	104.6	52.19	
019.0	008.3232	0044.5	021.0	169.2	050.0000	0330.6	104.5	52.17	
020.0	008.7320	0045.0	021.3	168.9	050.0000	0329.1	104.4	52.15	
021.0	009.1506	0045.3	021.7	168.6	050.0000	0327.2	104.3	52.10	
022.0	009.5790	0045.5	021.9	168.4	050.0000	0325.2	104.3	52.04	
023.0	010.0172	0045.6	022.2	168.1	050.0000	0323.1	104.3	51.96	
024.0	010.4976	0045.8	022.5	167.9	050.0000	0321.1	104.3	51.90	
025.0	010.9892	0046.2	022.8	167.6	050.0000	0319.1	104.3	51.84	
026.0	011.4921	0046.7	023.2	167.3	050.0000	0317.3	104.2	51.79	
027.0	012.0409	0047.1	023.5	167.0	050.0000	0315.5	104.2	51.73	
028.0	012.6025	0047.5	023.9	166.7	050.0000	0313.8	104.2	51.67	
029.0	013.2132	0047.9	024.2	166.4	050.0000	0311.9	104.2	51.60	
030.0	013.8384	0048.1	024.5	166.1	050.0000	0310.2	104.3	51.53	
031.0	014.4780	0048.1	024.8	165.8	050.0000	0308.7	104.4	51.45	
032.0	015.1710	0048.1	025.0	165.6	050.0000	0307.6	104.6	51.37	
033.0	015.8802	0048.2	025.3	165.3	050.0000	0306.7	104.7	51.31	
034.0	016.6464	0048.4	025.6	165.0	050.0000	0306.3	104.8	51.26	
035.0	017.4306	0048.7	026.0	164.7	050.0000	0306.2	104.9	51.21	
036.0	018.2329	0049.0	026.3	164.4	050.0000	0306.4	105.1	51.18	
037.0	019.0969	0049.2	026.6	164.1	050.0000	0307.1	105.2	51.15	
038.0	019.9809	0049.4	027.0	163.8	050.0000	0308.3	105.4	51.13	
039.0	020.9306	0049.6	027.3	163.5	050.0000	0310.0	105.6	51.12	

10-12-2009 FCC NGDC 30 Sec Terrain Data

**KOND BLH20010821AAG**

Channel = 221B  
 Max ERP = 50 kW  
 RCAMSL = 601 M  
 N. Lat. 37 07 40.0  
 W. Lng. 119 40 38.0  
 Protected  
 54 dBu

**Proposed 1212038**

Channel = 220B1  
 Max ERP = 25 kW  
 RCAMSL = 107 M  
 N. Lat. 36 01 31.0  
 W. Lng. 119 32 06.0  
 Interfering  
 48 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
129.0	050.0000	0255.6	075.5	031.3	014.6725	0048.1	087.9	41.08	
130.0	050.0000	0259.1	075.8	031.4	014.7310	0048.1	086.5	41.41	
131.0	050.0000	0259.9	075.9	031.3	014.6680	0048.1	085.2	41.71	
132.0	050.0000	0257.7	075.7	031.0	014.4751	0048.1	083.9	41.95	
133.0	050.0000	0253.1	075.3	030.5	014.1837	0048.1	082.7	42.14	
134.0	050.0000	0247.4	074.8	030.0	013.8386	0048.1	081.5	42.31	
135.0	050.0000	0241.8	074.3	029.4	013.4925	0048.0	080.4	42.46	
136.0	050.0000	0237.2	073.9	028.9	013.1650	0047.9	079.3	42.60	
137.0	050.0000	0233.0	073.6	028.4	012.8359	0047.7	078.2	42.74	
138.0	050.0000	0229.0	073.2	027.8	012.5081	0047.5	077.1	42.86	
139.0	050.0000	0224.3	072.8	027.2	012.1530	0047.2	076.0	42.96	
140.0	050.0000	0219.7	072.4	026.5	011.7915	0047.0	075.0	43.04	
141.0	050.0000	0218.6	072.3	026.1	011.5378	0046.8	073.9	43.18	
142.0	050.0000	0222.9	072.7	025.9	011.4653	0046.7	072.6	43.45	
143.0	050.0000	0232.6	073.5	026.1	011.5545	0046.8	071.1	43.84	
144.0	050.0000	0244.1	074.5	026.4	011.6913	0046.9	069.5	44.27	
145.0	050.0000	0253.9	075.4	026.5	011.7568	0046.9	067.9	44.66	
146.0	050.0000	0260.6	076.0	026.4	011.7011	0046.9	066.5	44.97	
147.0	050.0000	0266.3	076.5	026.2	011.5959	0046.8	065.0	45.25	
148.0	050.0000	0270.8	076.9	025.9	011.4344	0046.7	063.7	45.50	
149.0	050.0000	0274.1	077.2	025.5	011.2169	0046.5	062.4	45.71	
150.0	050.0000	0275.3	077.3	024.8	010.9083	0046.2	061.2	45.86	
151.0	050.0000	0274.4	077.2	024.0	010.5136	0045.9	060.2	45.93	
152.0	050.0000	0272.1	077.0	023.1	010.0631	0045.6	059.2	45.95	
153.0	050.0000	0272.9	077.1	022.3	009.7183	0045.5	058.2	46.07	
154.0	050.0000	0278.6	077.6	021.8	009.4973	0045.5	056.8	46.33	
155.0	050.0000	0286.0	078.2	021.4	009.3040	0045.4	055.4	46.63	
156.0	050.0000	0293.2	078.8	020.8	009.0733	0045.3	054.0	46.89	
157.0	050.0000	0302.4	079.6	020.3	008.8590	0045.1	052.5	47.17	
158.0	050.0000	0312.8	080.3	019.8	008.6293	0044.9	051.0	47.45	
159.0	050.0000	0319.4	080.8	018.9	008.2886	0044.5	049.7	47.56	
160.0	050.0000	0322.5	081.0	017.8	007.8788	0044.1	048.6	47.57	
161.0	050.0000	0323.5	081.1	016.5	007.4420	0044.2	047.7	47.59	
162.0	050.0000	0321.3	081.0	015.0	006.9938	0045.0	047.0	47.63	
163.0	050.0000	0313.8	080.4	013.2	006.5657	0046.3	046.8	47.64	
164.0	050.0000	0307.4	079.9	011.4	006.2861	0047.0	046.5	47.63	
165.0	050.0000	0306.3	079.8	009.8	006.0364	0047.0	046.0	47.61	
166.0	050.0000	0309.6	080.1	008.3	005.6987	0047.0	045.2	47.60	
167.0	050.0000	0315.7	080.5	006.9	005.3553	0047.0	044.3	47.62	

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
168.0	050.0000	0322.1	081.0	005.3	005.0048	0047.0	043.4	47.62	
169.0	050.0000	0329.6	081.6	003.7	004.6900	0047.0	042.4	47.64	
170.0	050.0000	0333.7	081.9	001.9	004.4699	0047.0	041.8	47.64	
171.0	050.0000	0334.5	081.9	000.0	004.3697	0047.0	041.5	47.65	
172.0	050.0000	0331.7	081.7	358.1	004.3879	0047.0	041.5	47.66	
173.0	050.0000	0327.6	081.4	356.1	004.4488	0047.0	041.7	47.66	
174.0	050.0000	0321.9	081.0	354.1	004.5924	0047.0	042.1	47.67	
175.0	050.0000	0318.6	080.8	352.2	004.6770	0047.0	042.4	47.66	
176.0	050.0000	0318.8	080.8	350.3	004.6872	0047.2	042.4	47.67	
177.0	050.0000	0321.2	081.0	348.4	004.6318	0047.5	042.4	47.67	
178.0	050.0000	0324.9	081.2	346.5	004.5794	0047.8	042.4	47.68	
179.0	050.0000	0329.0	081.5	344.5	004.5059	0048.3	042.4	47.67	
180.0	050.0000	0331.9	081.7	342.6	004.4944	0048.8	042.6	47.67	
181.0	050.0000	0334.7	081.9	340.7	004.4999	0049.3	042.9	47.67	
182.0	050.0000	0337.4	082.1	338.9	004.5420	0049.8	043.2	47.68	
183.0	050.0000	0337.7	082.2	337.2	004.6335	0050.4	043.8	47.67	
184.0	050.0000	0338.6	082.2	335.5	004.7433	0051.1	044.4	47.67	
185.0	050.0000	0340.4	082.4	333.8	004.8571	0051.7	045.0	47.67	
186.0	050.0000	0343.3	082.6	332.1	005.0247	0052.1	045.6	47.68	
187.0	050.0000	0346.6	082.8	330.5	005.2430	0052.3	046.3	47.69	
188.0	050.0000	0351.7	083.2	328.8	005.4483	0052.5	046.9	47.70	
189.0	050.0000	0356.9	083.5	327.2	005.6400	0052.9	047.5	47.70	
190.0	050.0000	0360.5	083.8	325.7	005.8903	0053.5	048.3	47.72	
191.0	050.0000	0362.1	083.9	324.4	006.2036	0054.0	049.3	47.72	
192.0	050.0000	0363.3	084.0	323.2	006.5554	0054.2	050.3	47.68	
193.0	050.0000	0365.1	084.1	322.1	006.9186	0054.5	051.4	47.62	
194.0	050.0000	0368.6	084.4	320.9	007.3034	0054.9	052.4	47.60	
195.0	050.0000	0372.2	084.6	319.7	007.6881	0055.5	053.4	47.58	
196.0	050.0000	0374.8	084.8	318.7	008.0590	0056.3	054.5	47.51	
197.0	050.0000	0375.9	084.9	317.8	008.3886	0057.0	055.8	47.39	
198.0	050.0000	0377.3	085.0	317.0	008.7270	0057.7	057.0	47.25	
199.0	050.0000	0378.9	085.1	316.2	009.0553	0058.2	058.2	47.08	
200.0	050.0000	0380.4	085.2	315.5	009.3614	0058.7	059.5	46.89	
201.0	050.0000	0380.9	085.2	314.9	009.6262	0059.2	060.9	46.66	
202.0	050.0000	0380.5	085.2	314.4	009.8490	0059.6	062.2	46.41	
203.0	050.0000	0379.5	085.1	314.0	010.0392	0060.0	063.6	46.13	
204.0	050.0000	0378.1	085.0	313.6	010.2122	0060.3	065.1	45.86	
205.0	050.0000	0376.6	084.9	313.3	010.3674	0060.5	066.5	45.57	
206.0	050.0000	0375.6	084.9	313.0	010.5180	0060.8	067.9	45.28	
207.0	050.0000	0375.1	084.8	312.7	010.6682	0061.0	069.4	44.99	
208.0	050.0000	0374.6	084.8	312.4	010.8046	0061.2	070.8	44.68	
209.0	050.0000	0373.4	084.7	312.2	010.9059	0061.3	072.3	44.36	
210.0	050.0000	0371.3	084.6	312.0	010.9702	0061.4	073.7	44.01	
211.0	050.0000	0369.8	084.4	311.9	011.0367	0061.4	075.2	43.67	
212.0	050.0000	0369.6	084.4	311.7	011.1256	0061.5	076.7	43.35	
213.0	050.0000	0370.0	084.5	311.5	011.2190	0061.6	078.1	43.02	
214.0	050.0000	0370.0	084.5	311.4	011.2867	0061.6	079.6	42.69	
215.0	050.0000	0369.3	084.4	311.3	011.3279	0061.7	081.0	42.34	
216.0	050.0000	0368.5	084.4	311.3	011.3554	0061.7	082.5	41.98	
217.0	050.0000	0367.4	084.3	311.2	011.3660	0061.7	084.0	41.62	
218.0	050.0000	0365.9	084.2	311.3	011.3574	0061.7	085.4	41.24	
219.0	050.0000	0364.0	084.0	311.3	011.3334	0061.7	086.9	40.86	

## Exhibit 18d - 1st Adjacent-Channel Contour Analysis vs. KPSL-FM

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Lat: N36:01:31 Lon: W119:32:06 NAD-27  
Scale: 1:1500000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/12/2009 8:48:46 PM

### PROPOSED

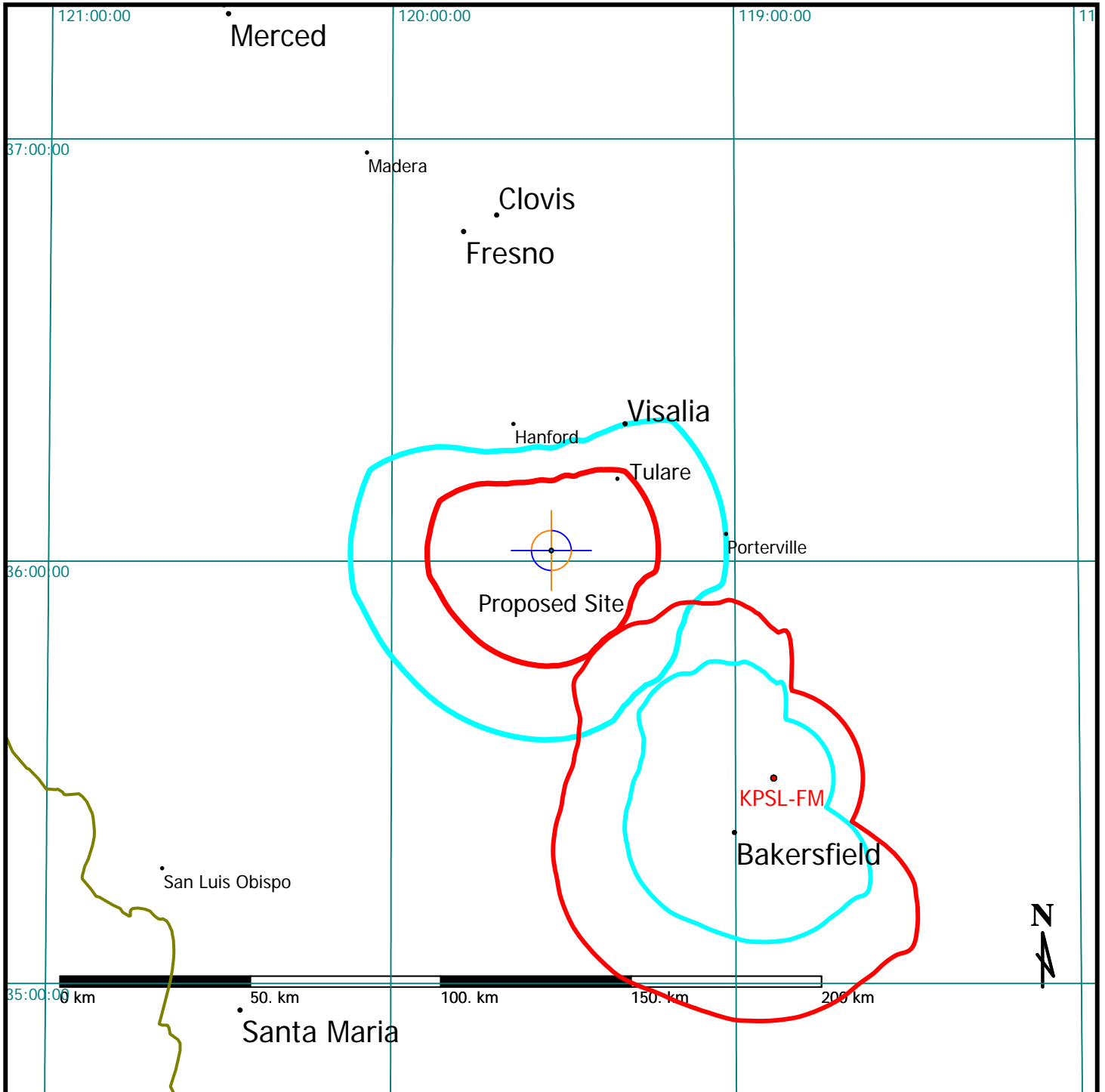
Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)

### AFFECTED

Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)



## Exhibit 18e - 1st Adjacent-Channel Contour Analysis vs. KPSL-FM - Detail

Brown Broadcast Services, Inc.  
Job: NCE Tulare - Visalia 10-12-09.fmj  
Master Database: 2009\_Oct\_12.fmd  
Scale: 1:75000  
Channel: 220 Class: B1

rfInvestigator Version 3.2.83  
by rfSoftware, Inc.  
Date: 10/14/2009 6:22:00 PM

### PROPOSED

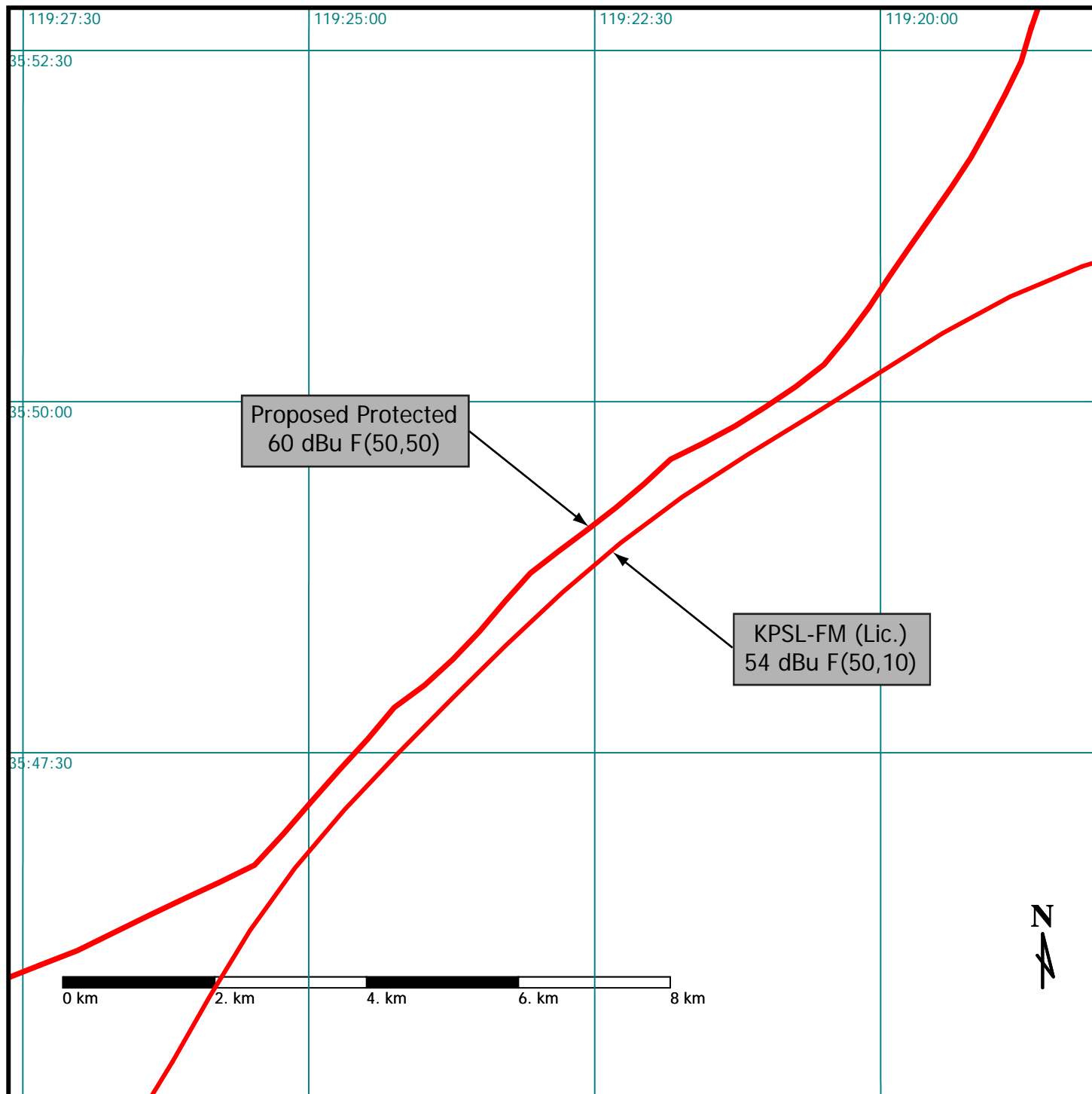
Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)

### AFFECTED

Protected: 60dbu F(50,50)

Interfering: 54dbu F(50,10)



**Exhibit 18f**

10-12-2009

FCC NGDC 30 Sec Terrain Data

FMOver Analysis

**Proposed 1212038**

Channel = 220B1

Max ERP = 25 kW

RCAMSL = 107 M

N. Lat. 36 01 31.0

W. Lng. 119 32 06.0

Protected

60 dBu

**KPSL-FM BLH19970714KA**

Channel = 221A

Max ERP = 6 kW

RCAMSL = 463 M

N. Lat. 35 29 11.0

W. Lng. 118 53 21.0

Interfering

54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
091.0	025.0000	0048.2	028.0	333.1	006.0000	0151.5	066.7	48.50	
092.0	025.0000	0048.2	028.0	332.9	006.0000	0152.1	066.3	48.67	
093.0	025.0000	0048.2	028.0	332.7	006.0000	0152.7	065.9	48.84	
094.0	025.0000	0048.2	028.0	332.4	006.0000	0153.2	065.4	49.01	
095.0	025.0000	0048.3	028.0	332.2	006.0000	0153.8	065.0	49.18	
096.0	025.0000	0048.2	028.0	332.0	006.0000	0154.4	064.6	49.35	
097.0	025.0000	0048.1	028.0	331.7	006.0000	0155.0	064.2	49.51	
098.0	025.0000	0048.0	028.0	331.4	006.0000	0155.6	063.8	49.66	
099.0	025.0000	0048.0	028.0	331.1	006.0000	0156.0	063.5	49.81	
100.0	025.0000	0048.0	028.0	330.9	006.0000	0156.3	063.1	49.96	
101.0	025.0000	0047.5	027.8	330.5	006.0000	0156.7	062.8	50.08	
102.0	025.0000	0046.4	027.5	330.0	006.0000	0156.9	062.6	50.14	
103.0	025.0000	0044.4	027.0	329.3	006.0000	0156.9	062.7	50.13	
104.0	025.0000	0042.3	026.4	328.6	006.0000	0156.8	062.8	50.09	
105.0	025.0000	0040.7	025.9	328.0	006.0000	0156.6	062.8	50.07	
106.0	025.0000	0039.5	025.5	327.5	006.0000	0156.3	062.8	50.07	
107.0	025.0000	0038.7	025.3	327.1	006.0000	0156.1	062.7	50.10	
108.0	025.0000	0038.0	025.1	326.6	006.0000	0155.8	062.5	50.13	
109.0	025.0000	0037.4	024.9	326.2	006.0000	0155.6	062.4	50.15	
110.0	025.0000	0036.7	024.7	325.8	006.0000	0155.3	062.3	50.17	
111.0	025.0000	0036.1	024.5	325.3	006.0000	0155.2	062.2	50.19	
112.0	025.0000	0035.7	024.4	325.0	006.0000	0155.0	062.1	50.24	
113.0	025.0000	0035.6	024.3	324.6	006.0000	0155.0	061.9	50.30	
114.0	025.0000	0035.6	024.3	324.3	006.0000	0155.0	061.7	50.38	
115.0	025.0000	0035.5	024.3	323.9	006.0000	0155.0	061.5	50.45	
116.0	025.0000	0035.7	024.4	323.6	006.0000	0155.1	061.2	50.54	
117.0	025.0000	0036.0	024.5	323.3	006.0000	0155.3	061.0	50.65	
118.0	025.0000	0036.3	024.6	322.9	006.0000	0155.6	060.7	50.76	
119.0	025.0000	0036.5	024.6	322.6	006.0000	0156.0	060.5	50.86	
120.0	025.0000	0036.6	024.7	322.2	006.0000	0156.6	060.3	50.97	
121.0	025.0000	0036.7	024.7	321.9	006.0000	0157.5	060.1	51.08	
122.0	025.0000	0036.9	024.7	321.5	006.0000	0158.6	059.9	51.21	
123.0	025.0000	0037.2	024.8	321.1	006.0000	0160.0	059.6	51.36	
124.0	025.0000	0037.8	025.0	320.8	006.0000	0161.7	059.4	51.56	
125.0	025.0000	0038.5	025.2	320.4	006.0000	0163.6	059.0	51.76	
126.0	025.0000	0039.1	025.4	320.0	006.0000	0165.6	058.7	51.97	
127.0	025.0000	0039.7	025.6	319.7	006.0000	0167.7	058.5	52.17	
128.0	025.0000	0040.2	025.7	319.3	006.0000	0169.8	058.2	52.37	
129.0	025.0000	0040.8	025.9	318.9	006.0000	0171.9	058.0	52.56	
130.0	025.0000	0041.5	026.1	318.4	006.0000	0173.8	057.7	52.75	

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
131.0	024.6512	0042.1	026.2	318.0	006.0000	0175.7	057.5	52.91	
132.0	024.3049	0042.8	026.3	317.6	006.0000	0177.4	057.4	53.04	
133.0	024.0100	0043.4	026.4	317.1	006.0000	0179.0	057.2	53.17	
134.0	023.6682	0044.0	026.5	316.7	006.0000	0180.5	057.1	53.28	
135.0	023.3289	0044.6	026.6	316.2	006.0000	0181.9	057.0	53.38	
136.0	022.9920	0045.2	026.7	315.7	006.0000	0183.2	056.9	53.47	
137.0	022.6576	0045.9	026.8	315.3	006.0000	0184.3	056.9	53.55	
138.0	022.3729	0046.6	026.9	314.8	006.0000	0185.3	056.8	53.63	
139.0	022.0430	0047.3	027.0	314.3	006.0000	0186.3	056.7	53.70	
140.0	021.7156	0047.9	027.1	313.8	006.0000	0187.3	056.7	53.75	
141.0	021.1600	0048.4	027.1	313.3	006.0000	0188.2	056.7	53.77	
142.0	020.6116	0048.9	027.0	312.9	006.0000	0189.3	056.8	53.78	
143.0	020.1152	0049.3	027.0	312.4	006.0000	0190.4	057.0	53.78	
144.0	019.5806	0049.7	026.9	312.0	006.0000	0191.6	057.1	53.77	
145.0	019.0532	0050.0	026.8	311.5	006.0000	0192.7	057.3	53.75	
146.0	019.0096	0050.3	026.9	311.1	006.0000	0193.8	057.3	53.78	
147.0	018.9660	0050.6	027.0	310.6	006.0000	0194.9	057.4	53.80	
148.0	018.9225	0050.8	027.0	310.1	006.0000	0195.8	057.5	53.80	
149.0	018.8790	0051.1	027.1	309.7	006.0000	0196.5	057.6	53.80	
150.0	018.8356	0051.4	027.1	309.2	006.0000	0197.4	057.7	53.79	
151.0	019.0096	0051.8	027.3	308.7	006.0000	0198.2	057.7	53.82	
152.0	019.1844	0052.4	027.5	308.2	006.0000	0198.9	057.8	53.85	
153.0	019.3160	0052.9	027.7	307.7	006.0000	0199.6	057.8	53.86	
154.0	019.4922	0053.3	027.8	307.2	006.0000	0200.3	057.9	53.86	
155.0	019.6692	0053.5	027.9	306.7	006.0000	0200.9	058.0	53.84	
156.0	020.3852	0053.5	028.1	306.2	006.0000	0201.8	058.1	53.86	
157.0	021.1140	0053.5	028.4	305.7	006.0000	0202.6	058.1	53.87	
158.0	021.8556	0053.6	028.6	305.1	006.0000	0203.3	058.2	53.88	
159.0	022.6100	0053.7	028.9	304.6	006.0000	0204.0	058.2	53.88	
160.0	023.3772	0053.9	029.1	304.0	006.0000	0204.6	058.3	53.88	
161.0	023.5225	0054.0	029.2	303.6	006.0000	0204.9	058.6	53.79	
162.0	023.7169	0054.0	029.2	303.2	006.0000	0205.0	058.8	53.70	
163.0	023.8632	0054.1	029.3	302.7	006.0000	0205.1	059.1	53.60	
164.0	024.0100	0054.3	029.4	302.3	006.0000	0205.1	059.4	53.50	
165.0	024.2064	0054.4	029.5	301.9	006.0000	0204.9	059.7	53.39	
166.0	024.3542	0054.5	029.5	301.5	006.0000	0204.8	060.0	53.27	
167.0	024.5025	0054.6	029.6	301.1	006.0000	0204.8	060.3	53.15	
168.0	024.6512	0054.8	029.7	300.7	006.0000	0204.9	060.6	53.04	
169.0	024.8502	0055.0	029.8	300.3	006.0000	0205.0	060.9	52.92	
170.0	025.0000	0055.1	029.9	299.9	006.0000	0205.2	061.3	52.81	
171.0	025.0000	0055.3	029.9	299.6	006.0000	0205.6	061.7	52.68	
172.0	025.0000	0055.5	030.0	299.3	006.0000	0206.1	062.0	52.57	
173.0	025.0000	0055.7	030.0	298.9	006.0000	0206.7	062.4	52.46	
174.0	025.0000	0055.9	030.1	298.6	006.0000	0207.4	062.8	52.34	
175.0	025.0000	0056.1	030.1	298.3	006.0000	0208.0	063.2	52.22	
176.0	025.0000	0056.3	030.2	298.0	006.0000	0208.6	063.6	52.10	
177.0	025.0000	0056.5	030.2	297.8	006.0000	0209.3	064.1	51.98	
178.0	025.0000	0056.5	030.2	297.5	006.0000	0209.7	064.5	51.84	
179.0	025.0000	0056.5	030.2	297.3	006.0000	0210.1	065.0	51.70	
180.0	025.0000	0056.6	030.2	297.1	006.0000	0210.5	065.4	51.55	
181.0	025.0000	0056.8	030.3	296.8	006.0000	0210.7	065.9	51.41	

10-12-2009 FCC NGDC 30 Sec Terrain Data

**KPSL-FM BLH19970714KA**

Channel = 221A  
 Max ERP = 6 kW  
 RCAMSL = 463 M  
 N. Lat. 35 29 11.0  
 W. Lng. 118 53 21.0  
 Protected  
 60 dBu

**Proposed 1212038**

Channel = 220B1  
 Max ERP = 25 kW  
 RCAMSL = 107 M  
 N. Lat. 36 01 31.0  
 W. Lng. 119 32 06.0  
 Interfering  
 54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
271.0	006.0000	0171.8	036.4	159.6	023.0871	0053.8	063.2	49.36	
272.0	006.0000	0168.7	036.1	159.1	022.7222	0053.8	062.7	49.41	
273.0	006.0000	0166.0	035.8	158.7	022.3702	0053.7	062.3	49.45	
274.0	006.0000	0164.0	035.6	158.3	022.0587	0053.6	061.8	49.52	
275.0	006.0000	0163.5	035.6	158.0	021.8286	0053.6	061.3	49.61	
276.0	006.0000	0163.0	035.5	157.7	021.5991	0053.5	060.7	49.71	
277.0	006.0000	0162.4	035.5	157.3	021.3503	0053.5	060.2	49.80	
278.0	006.0000	0161.5	035.4	156.9	021.0722	0053.5	059.7	49.88	
279.0	006.0000	0160.5	035.3	156.5	020.7795	0053.5	059.3	49.95	
280.0	006.0000	0159.6	035.2	156.1	020.4851	0053.5	058.8	50.02	
281.0	006.0000	0159.8	035.2	155.8	020.2530	0053.5	058.3	50.12	
282.0	006.0000	0160.8	035.3	155.6	020.0622	0053.5	057.7	50.24	
283.0	006.0000	0162.1	035.4	155.3	019.8754	0053.5	057.1	50.37	
284.0	006.0000	0163.3	035.6	155.0	019.6723	0053.5	056.6	50.48	
285.0	006.0000	0164.1	035.6	154.7	019.6111	0053.4	056.0	50.63	
286.0	006.0000	0165.1	035.7	154.3	019.5515	0053.4	055.5	50.77	
287.0	006.0000	0166.9	035.9	154.1	019.5011	0053.3	054.9	50.93	
288.0	006.0000	0170.4	036.3	153.9	019.4680	0053.3	054.2	51.12	
289.0	006.0000	0175.2	036.8	153.7	019.4470	0053.2	053.4	51.35	
290.0	006.0000	0180.7	037.3	153.6	019.4255	0053.2	052.6	51.59	
291.0	006.0000	0186.5	037.7	153.5	019.3974	0053.1	051.8	51.81	
292.0	006.0000	0192.0	038.2	153.2	019.3600	0053.1	051.0	52.03	
293.0	006.0000	0197.5	038.6	153.0	019.3163	0052.9	050.2	52.24	
294.0	006.0000	0203.0	039.1	152.7	019.2784	0052.8	049.5	52.44	
295.0	006.0000	0207.8	039.4	152.3	019.2303	0052.6	048.8	52.62	
296.0	006.0000	0210.4	039.6	151.8	019.1562	0052.3	048.2	52.73	
297.0	006.0000	0210.6	039.6	151.2	019.0394	0051.9	047.8	52.77	
298.0	006.0000	0208.7	039.5	150.4	018.9029	0051.5	047.5	52.77	
299.0	006.0000	0206.6	039.3	149.6	018.8539	0051.2	047.3	52.78	
300.0	006.0000	0205.2	039.2	148.8	018.8882	0051.0	047.0	52.84	
301.0	006.0000	0204.8	039.2	148.0	018.9209	0050.8	046.7	52.91	
302.0	006.0000	0205.0	039.2	147.3	018.9535	0050.7	046.4	52.99	
303.0	006.0000	0205.1	039.2	146.5	018.9868	0050.5	046.1	53.06	
304.0	006.0000	0204.6	039.2	145.7	019.0218	0050.2	045.9	53.11	
305.0	006.0000	0203.5	039.1	144.9	019.1134	0050.0	045.7	53.14	
306.0	006.0000	0202.1	039.0	144.0	019.5636	0049.7	045.6	53.24	
307.0	006.0000	0200.5	038.9	143.2	020.0230	0049.4	045.5	53.32	
308.0	006.0000	0199.2	038.8	142.3	020.4557	0049.0	045.4	53.38	
309.0	006.0000	0197.8	038.7	141.5	020.9112	0048.6	045.4	53.44	



Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
310.0	006.0000	0196.0	038.5	140.6	021.3903	0048.2	045.4	53.47	
311.0	006.0000	0193.9	038.3	139.7	021.8089	0047.7	045.4	53.47	
312.0	006.0000	0191.5	038.2	138.8	022.0930	0047.2	045.5	53.41	
313.0	006.0000	0189.0	037.9	138.0	022.3754	0046.6	045.7	53.33	
314.0	006.0000	0186.9	037.8	137.1	022.6149	0046.0	045.8	53.25	
315.0	006.0000	0184.9	037.6	136.3	022.8849	0045.4	045.9	53.17	
316.0	006.0000	0182.4	037.4	135.5	023.1596	0044.9	046.1	53.08	
317.0	006.0000	0179.4	037.1	134.7	023.4294	0044.4	046.4	52.98	
318.0	006.0000	0175.7	036.8	133.9	023.6916	0044.0	046.8	52.85	
319.0	006.0000	0171.2	036.4	133.2	023.9415	0043.6	047.2	52.69	
320.0	006.0000	0165.9	035.8	132.5	024.1516	0043.1	047.9	52.49	
321.0	006.0000	0160.6	035.3	131.9	024.3455	0042.7	048.5	52.29	
322.0	006.0000	0157.1	034.9	131.2	024.5647	0042.3	049.0	52.14	
323.0	006.0000	0155.6	034.7	130.6	024.7923	0041.9	049.3	52.03	
324.0	006.0000	0155.0	034.7	129.9	025.0000	0041.4	049.5	51.95	
325.0	006.0000	0155.1	034.7	129.2	025.0000	0041.0	049.6	51.84	
326.0	006.0000	0155.5	034.7	128.6	025.0000	0040.5	049.7	51.74	
327.0	006.0000	0156.0	034.8	127.9	025.0000	0040.2	049.9	51.64	
328.0	006.0000	0156.6	034.8	127.2	025.0000	0039.8	050.0	51.55	
329.0	006.0000	0156.9	034.9	126.5	025.0000	0039.4	050.2	51.44	
330.0	006.0000	0156.9	034.9	125.9	025.0000	0039.0	050.4	51.32	
331.0	006.0000	0156.2	034.8	125.3	025.0000	0038.7	050.8	51.18	
332.0	006.0000	0154.3	034.6	124.8	025.0000	0038.3	051.2	51.02	
333.0	006.0000	0151.7	034.3	124.4	025.0000	0038.0	051.7	50.83	
334.0	006.0000	0149.1	034.0	123.9	025.0000	0037.7	052.3	50.65	
335.0	006.0000	0146.4	033.7	123.6	025.0000	0037.5	052.9	50.48	
336.0	006.0000	0143.1	033.3	123.2	025.0000	0037.3	053.5	50.30	
337.0	006.0000	0139.2	032.9	123.0	025.0000	0037.2	054.2	50.11	
338.0	006.0000	0135.5	032.4	122.7	025.0000	0037.1	054.8	49.93	
339.0	006.0000	0132.6	032.1	122.5	025.0000	0037.0	055.4	49.77	
340.0	006.0000	0130.4	031.9	122.2	025.0000	0036.9	056.0	49.63	
341.0	006.0000	0128.5	031.6	121.9	025.0000	0036.8	056.5	49.49	
342.0	006.0000	0126.9	031.5	121.5	025.0000	0036.8	057.0	49.37	
343.0	006.0000	0125.8	031.3	121.2	025.0000	0036.7	057.4	49.26	
344.0	006.0000	0126.0	031.4	120.8	025.0000	0036.7	057.8	49.16	
345.0	006.0000	0126.6	031.4	120.3	025.0000	0036.6	058.1	49.08	
346.0	006.0000	0126.1	031.4	120.0	025.0000	0036.6	058.5	48.98	
347.0	006.0000	0123.8	031.1	119.8	025.0000	0036.6	059.1	48.84	
348.0	006.0000	0120.0	030.7	119.7	025.0000	0036.6	059.8	48.69	
349.0	006.0000	0116.8	030.4	119.7	025.0000	0036.6	060.4	48.54	
350.0	006.0000	0113.1	029.9	119.6	025.0000	0036.6	061.1	48.39	
351.0	006.0000	0108.9	029.4	119.7	025.0000	0036.6	061.8	48.23	
352.0	006.0000	0106.2	029.1	119.7	025.0000	0036.6	062.4	48.09	
353.0	006.0000	0102.8	028.7	119.7	025.0000	0036.6	063.1	47.95	
354.0	006.0000	0098.9	028.1	119.8	025.0000	0036.6	063.8	47.80	
355.0	006.0000	0096.5	027.8	119.8	025.0000	0036.6	064.4	47.67	
356.0	006.0000	0092.3	027.2	120.0	025.0000	0036.6	065.1	47.52	
357.0	006.0000	0088.2	026.7	120.1	025.0000	0036.6	065.8	47.38	
358.0	006.0000	0084.6	026.1	120.3	025.0000	0036.6	066.5	47.24	
359.0	006.0000	0081.5	025.7	120.4	025.0000	0036.6	067.1	47.12	
000.0	006.0000	0079.3	025.4	120.5	025.0000	0036.6	067.6	47.01	
001.0	006.0000	0077.1	025.0	120.5	025.0000	0036.6	068.2	46.89	

## **EXHIBIT 22**

### **ENVIRONMENTAL PROTECTION ACT / NIER ANALYSIS**

The applicant proposes mounting a new antenna on an existing 67 meter tower. The proposed center of radiation is 50m AGL. A Shively 6810 4-bay antenna is anticipated. Calculations were made using FM Model for Windows. FM Model predicted a peak exposure of  $53.2\mu\text{w}/\text{cm}^2$ , at 21.6 meters from the tower. This represents 26.6% of the Maximum Permissible Exposure (MPE) of  $200\mu\text{w}/\text{cm}^2$  for uncontrolled environments. The other facilities at this site are non-broadcast in nature, and are not significant RF Exposure contributors for humans at ground level.

The applicant will ensure that public access to the tower is restricted by fencing, anti-climb devices, or other appropriate measures. The site will be posted with appropriate RF exposure warning signs. If tower climbing by authorized personnel becomes necessary, transmitter power will be reduced or operation will cease, as necessary, so as to not exceed the RF exposure limits.

No modification of the existing tower is proposed, other than side-mounting the antenna. The tower was constructed prior to March 16, 2001. The Nationwide Programmatic Agreement generally allows such a collocation without consultation or review under Section 106 and Subpart B of 36 CFR §800. The applicant believes that it is in full compliance with the Agreement, and that no further study is required.