

**Engineering Statement
In Support of an
Application for a Construction Permit
KPNC, Channel 264C3, Ponca City, Oklahoma**

General

The instant application is being prepared in response to the Report and Order issued in MB Docket 05-136. That Order moved KPNC from 265A to 264C3, and it remained licensed to Ponca City. KPNC hereby files its FCC Form 301 to bring the facility into compliance with the Commission's R&O. It is short spaced to the contingently-filed KATT-FM, channel 263C1, Oklahoma City, Oklahoma. KATT and KPNC accept §73.215 spacing to one another.

Exhibits Explained

Exhibit E, Figure 1 shows that the only other facility to which KPNC will be short spaced is the proposed KATT facility on channel 263C1. KPNC will protect KATT (and vice versa) under §73.215 by using a directional antenna.

Exhibit E, Figures 2 and 3 show that the proposed facility provides 70 dBu coverage to 100% of the community of license (Ponca City, Oklahoma). Exhibit E, Figure 4 is a vertical sketch of all the pertinent tower and antenna elevations for the proposed facility. KPNC proposes to locate its antenna below the current licensed antenna of KLOR, channel 257A. Sufficient filtering will be used to prevent any inter-reaction between the two antennas.

Exhibit E, Figures 5 and 5(a) are protected and interfering contour maps proving that the proposed KPNC facility will not overlap KATT's protected or interfering contours.

Exhibit E, Figure 5(a) is a zoomed view map that more clearly shows the questionable areas.

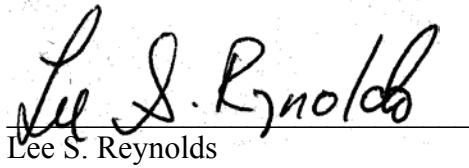
Human Exposure to Radiofrequency Radiation (no exhibits)

By using the RF Worksheet #1A, KLOR produces a power density 2 meters above ground at areas near the tower of $27.74 \mu\text{W}/\text{cm}^2$. By using the "FMModel" program, assuming an ERI 6-bay full-wave antenna (the antenna that the applicant proposes to use), the maximum power density found anywhere near the tower is $21.39 \mu\text{W}/\text{cm}^2$. The sum of these two figures is $49.13 \mu\text{W}/\text{cm}^2$, which is 24.6% of the uncontrolled limit and 4.9% of the controlled limit. Hence, the proposed facility causes no detrimental human exposure to radiofrequency radiation issues.

Conclusion

By using a directional antenna, KPNC can operate from the proposed tower with an AGL of 75 meters and an ERP of 25 kW and be compliant with the FCC's rules and regulations.

For the applicant:

A handwritten signature in black ink, reading "Lee S. Reynolds", is written over a horizontal line. The signature is cursive and stylized, with the first letters of each word being capitalized and prominent. The ink is slightly smudged, giving it a natural, hand-drawn appearance. The signature is positioned above the printed name "Lee S. Reynolds".

Reynolds Technical Associates
6930 Cahaba Valley Road
Suite 202
Birmingham, AL 35242
(205) 618-2020

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Channel Spacing Study

REFERENCE		DISPLAY DATES
36 46 59 N	CLASS = C3	DATA 06-21-07
97 04 15 W	Current Spacings	SEARCH 07-02-07
----- Channel 264 - 100.7 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
AL4924	RSV 264C3	Ponca City	OK 6.56	350.5	153.0	-146.44
KPNC	LIC 265A	Ponca City	OK 13.04	180.5	89.0	-75.96

Of no concern:
Coordinates used by KPNC.

KATT-F	LIC 263C	Oklahoma City	OK 137.56	195.7	176.0	-38.44
RDEL	DEL 263C	Oklahoma City	OK 137.56	195.7	176.0	-38.44
KATT-F	APP-N 263C	Oklahoma City	OK 140.72	195.4	176.0	-35.28
RADD	ADD 263C0	Oklahoma City	OK 137.56	195.7	163.0	-25.44

Of concern:
KATT downgraded to a class C1 facility and changed it coordinates
in a contingent application
(see below).

KATT.A	APP 263C1	Oklahoma City	OK 140.72	195.4	144.0	-3.28
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Of concern:
Protection afforded under §73.215.

AL9344	RSV 264A	Chelsea	OK 147.87	100.8	142.0	5.87
KTFR	LIC 264A	Chelsea	OK 148.99	101.6	142.0	6.99
KIBB	LIC-N 263C3	Augusta	KS 106.14	355.9	99.0	7.14
KXOJ-F	RSV 265C3	Sapulpa	OK 118.28	133.5	99.0	19.28
KXOJ-F	APP 265C3	Sapulpa	OK 118.28	133.5	99.0	19.28
AL4914	RSV 266A	Stillwater	OK 63.08	187.5	42.0	21.08
KFDI-F	LIC 267C	Wichita	KS 119.70	340.2	96.0	23.70
KYFM	LIC 261C2	Bartlesville	OK 80.51	102.1	56.0	24.51
KXOJ-F	LIC 265A	Sapulpa	OK 118.30	132.5	89.0	29.30
KHOK	LIC 264C1	Hoisington	KS 246.39	323.2	211.0	35.39
KTFR	RSV 263C3	Chelsea	OK 142.24	97.1	99.0	43.24
KTFR.A	APP 263C3	Chelsea	OK 142.24	97.1	99.0	43.24

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Terrain/Contour Study

Reference Coordinates:

ERP: 25 kW

North Latitude: 36-46-59

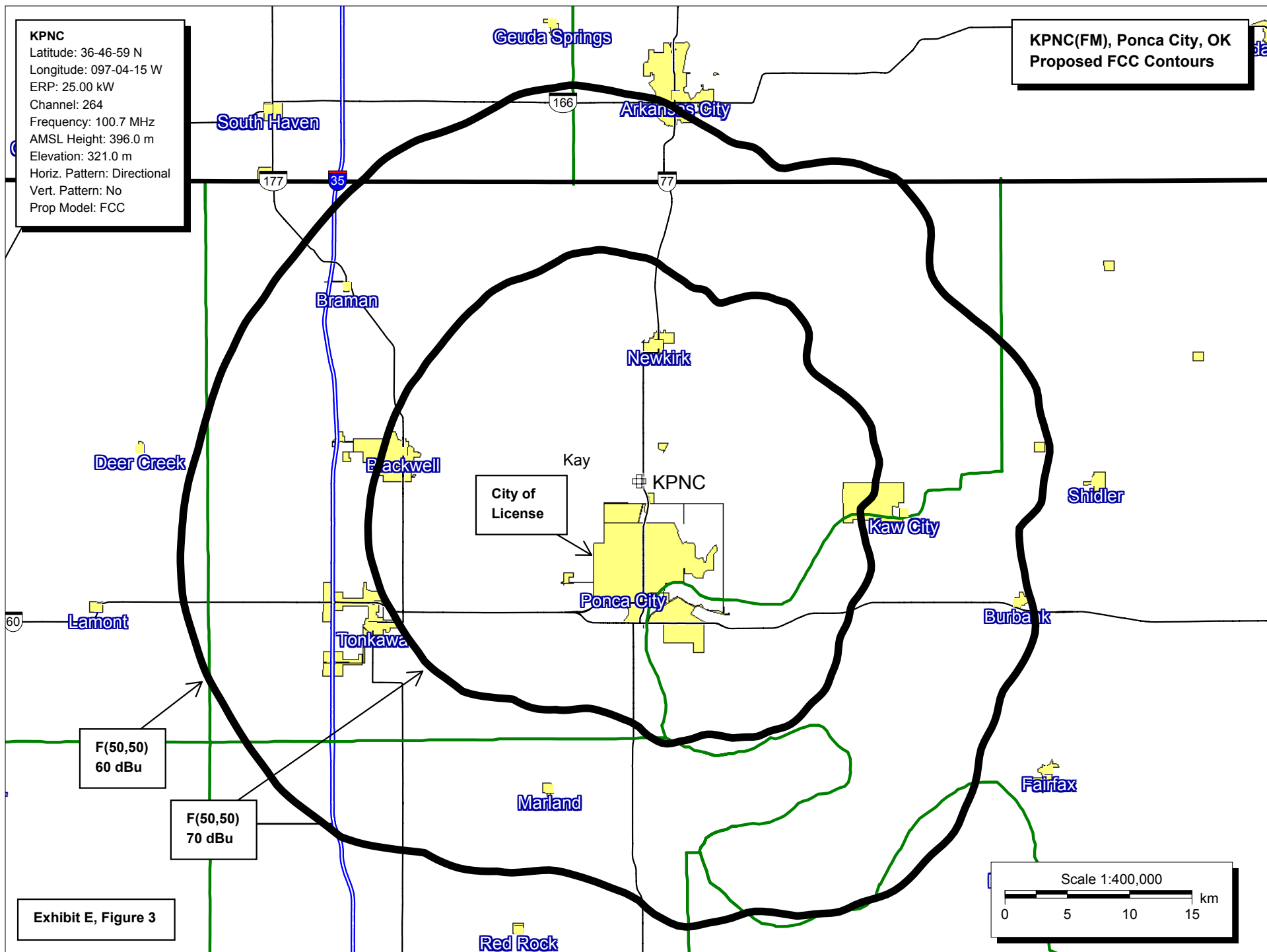
West Longitude: 97-4-15

Azimuth °T.	Ave. Elev. 3 to 16 km (Meters AMSL)	FM - 2-6 Tables Effective Antenna Height (Meters AAT)	ERP (dBk)	F(50-50) Distance to 70 dBu Contour (km)	F(50-50) Distance to 60 dBu Contour (km)
0	336.8	59.2	13.979	18.0	30.9
5	339.6	56.4	13.979	17.5	30.2
10	344.2	51.8	13.979	16.7	29.0
15	347.2	48.8	13.979	16.1	28.2
20	347.3	48.7	13.979	16.1	28.2
25	349.1	46.9	13.979	15.8	27.7
30	342.1	53.9	13.979	17.1	29.6
35	336.3	59.7	13.979	18.1	31.0
40	332.5	63.5	13.979	18.6	31.8
45	333.6	62.4	13.979	18.4	31.6
50	338.1	57.9	13.979	17.8	30.6
55	345.5	50.5	13.979	16.5	28.7
60	344.5	51.5	13.979	16.7	28.9
65	340.2	55.8	13.979	17.4	30.0
70	334.5	61.5	13.979	18.3	31.4
75	329.8	66.2	13.979	19.0	32.4
80	329.0	67.0	13.979	19.1	32.6
85	327.2	68.8	13.979	19.3	33.0
90	329.8	66.2	13.979	19.0	32.4
95	333.8	62.2	13.979	18.4	31.5
100	336.2	59.8	13.979	18.1	31.0
105	331.0	65.0	13.979	18.8	32.2
110	323.5	72.5	13.979	19.8	33.8
115	322.5	73.5	13.979	19.9	34.0
120	324.2	71.8	13.979	19.7	33.7
125	320.4	75.6	13.979	20.2	34.5
130	315.5	80.5	13.979	20.9	35.5
135	307.9	88.1	13.979	21.8	37.0
140	302.5	93.5	13.979	22.5	38.0
145	299.9	96.1	13.979	22.8	38.4
150	299.4	96.6	13.979	22.8	38.5
155	301.9	94.1	13.979	22.6	38.1

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ERP: 25 kW

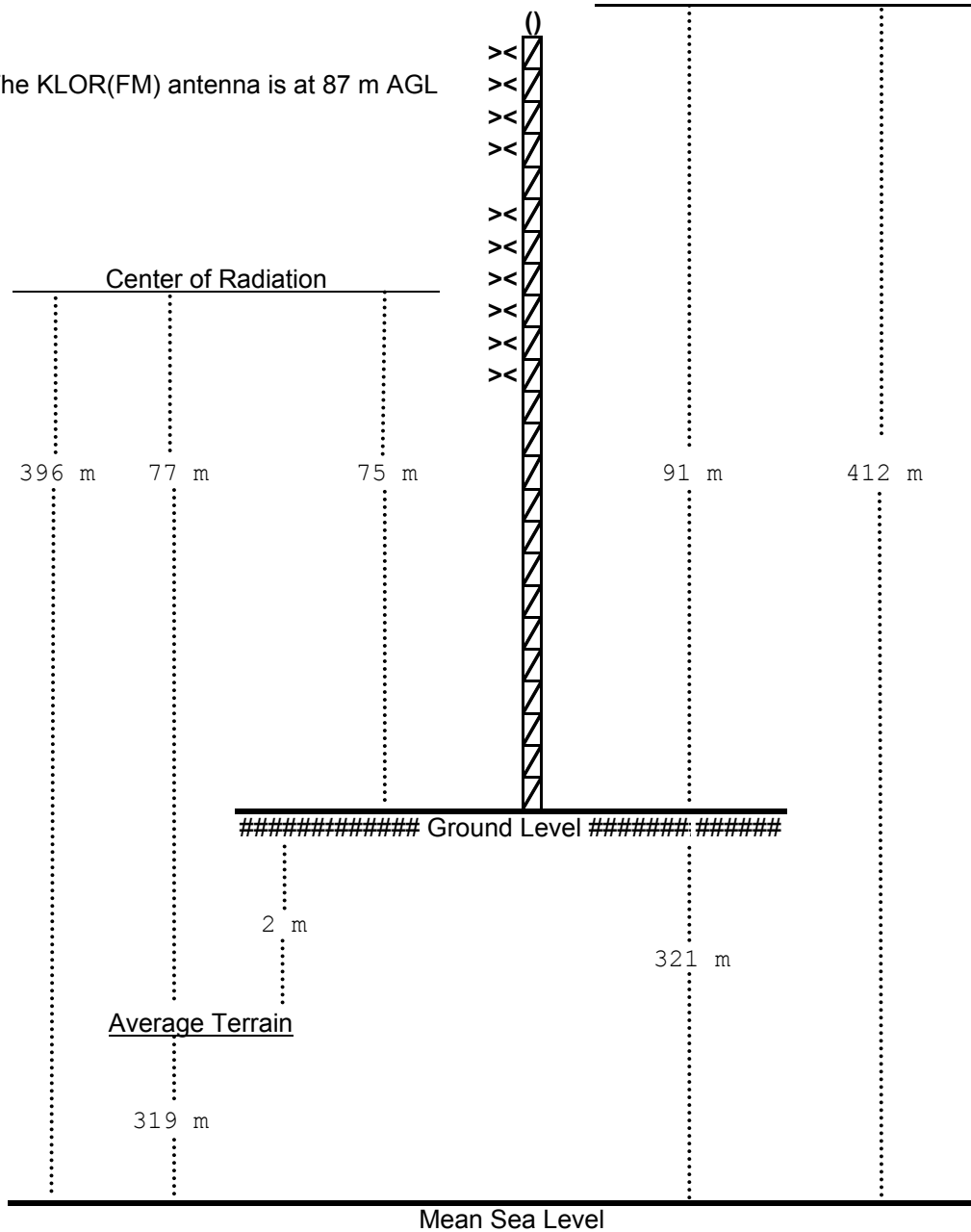
Azimuth °T.	Ave. Elev. 3 to 16 km (Meters AMSL)	FM - 2-6 Tables Effective Antenna Height (Meters AAT)	ERP (dBk)	F(50-50) Distance to 70 dBu Contour (km)	F(50-50) Distance to 60 dBu Contour (km)
160	307.3	88.7	13.979	21.9	37.1
165	309.7	86.3	13.444	21.0	35.7
170	303.5	92.5	12.908	21.1	35.8
175	295.7	100.3	12.101	21.1	35.8
180	299.4	96.6	11.293	19.7	33.6
185	304.4	91.6	11.143	19.0	32.5
190	305.8	90.2	10.992	18.7	31.9
195	303.2	92.8	10.955	18.9	32.3
200	297.5	98.5	10.919	19.5	33.3
205	295.8	100.2	11.274	20.1	34.2
210	298.5	97.5	11.630	20.2	34.4
215	300.4	95.6	12.564	21.1	35.8
220	301.8	94.2	13.497	22.0	37.2
225	302.7	93.3	13.738	22.2	37.5
230	302.9	93.1	13.979	22.4	37.9
235	303.4	92.6	13.979	22.4	37.8
240	303.4	92.6	13.979	22.4	37.8
245	302.7	93.3	13.979	22.5	37.9
250	303.2	92.8	13.979	22.4	37.8
255	303.6	92.4	13.979	22.3	37.8
260	306.1	89.9	13.979	22.1	37.3
265	309.3	86.7	13.979	21.7	36.7
270	312.5	83.5	13.979	21.3	36.1
275	316.2	79.8	13.979	20.8	35.4
280	318.3	77.7	13.979	20.5	34.9
285	320.0	76.0	13.979	20.3	34.6
290	322.0	74.0	13.979	20.0	34.1
295	324.6	71.4	13.979	19.7	33.6
300	326.1	69.9	13.979	19.5	33.3
305	327.6	68.4	13.979	19.3	32.9
310	328.0	68.0	13.979	19.2	32.8
315	328.1	67.9	13.979	19.2	32.8
320	327.9	68.1	13.979	19.2	32.9
325	328.5	67.5	13.979	19.1	32.7
330	330.9	65.1	13.979	18.8	32.2
335	332.3	63.7	13.979	18.6	31.9
340	330.8	65.2	13.979	18.8	32.2
345	330.0	66.0	13.979	18.9	32.4
350	330.7	65.3	13.979	18.8	32.2
355	333.9	62.1	13.979	18.4	31.5



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Vertical Sketch

Note: The KLOR(FM) antenna is at 87 m AGL

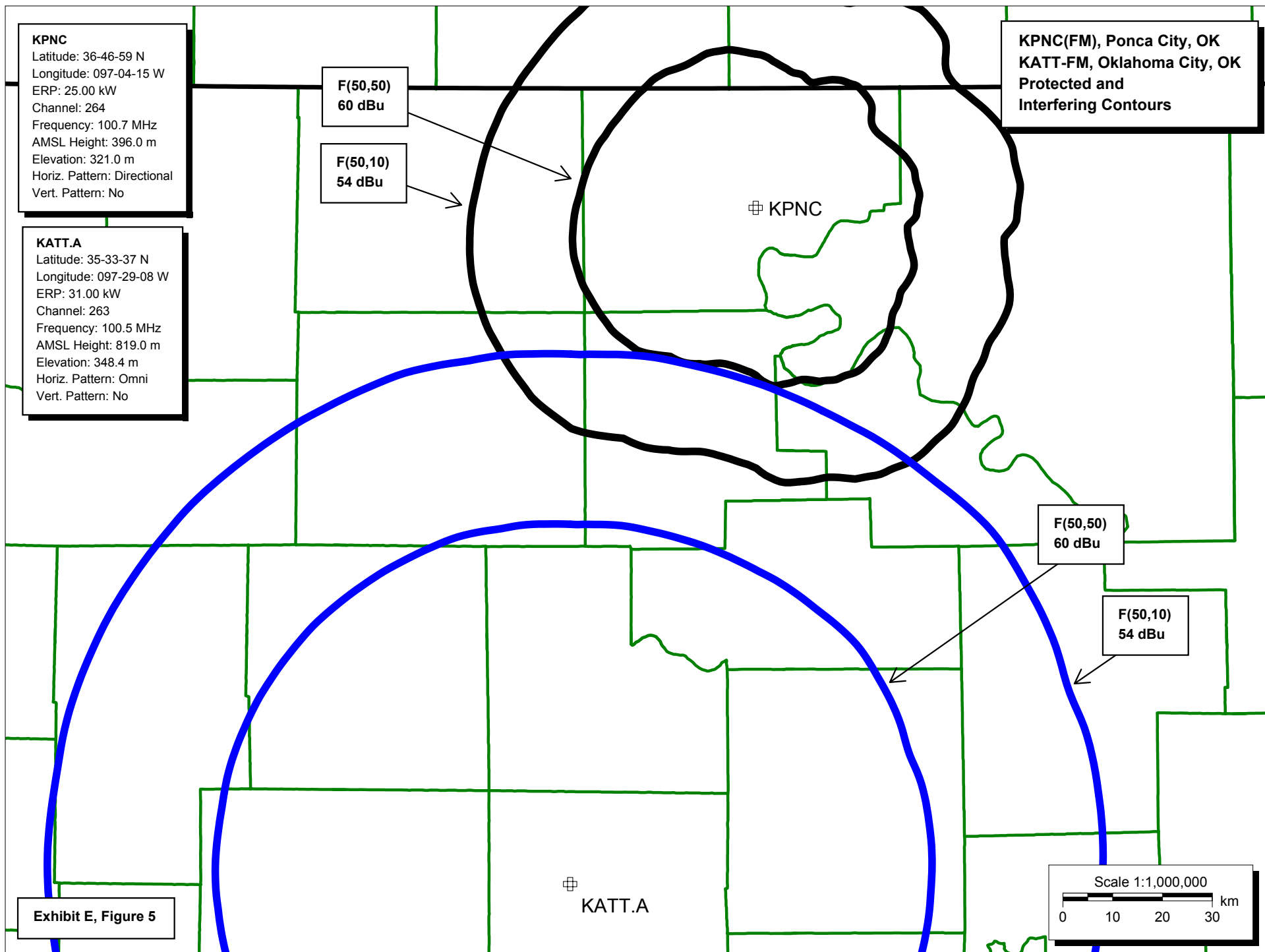


Proposed Location: 36° 46' 59" N. Lat. 97° 4' 15" W. Long. [NAD27]

NOT DRAWN TO SCALE

Proposed Antenna: 6 elements

Tower Registration Number: 1012227



KPNC

Latitude: 36-46-59 N
Longitude: 097-04-15 W
ERP: 25.00 kW
Channel: 264
Frequency: 100.7 MHz
AMSL Height: 396.0 m
Elevation: 321.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KATT.A

Latitude: 35-33-37 N
Longitude: 097-29-08 W
ERP: 31.00 kW
Channel: 263
Frequency: 100.5 MHz
AMSL Height: 819.0 m
Elevation: 348.4 m
Horiz. Pattern: Omni
Vert. Pattern: No

**KPNC(FM), Ponca City, OK
KATT-FM, Oklahoma City, OK
Protected and
Interfering Contours
(Zoomed View)**

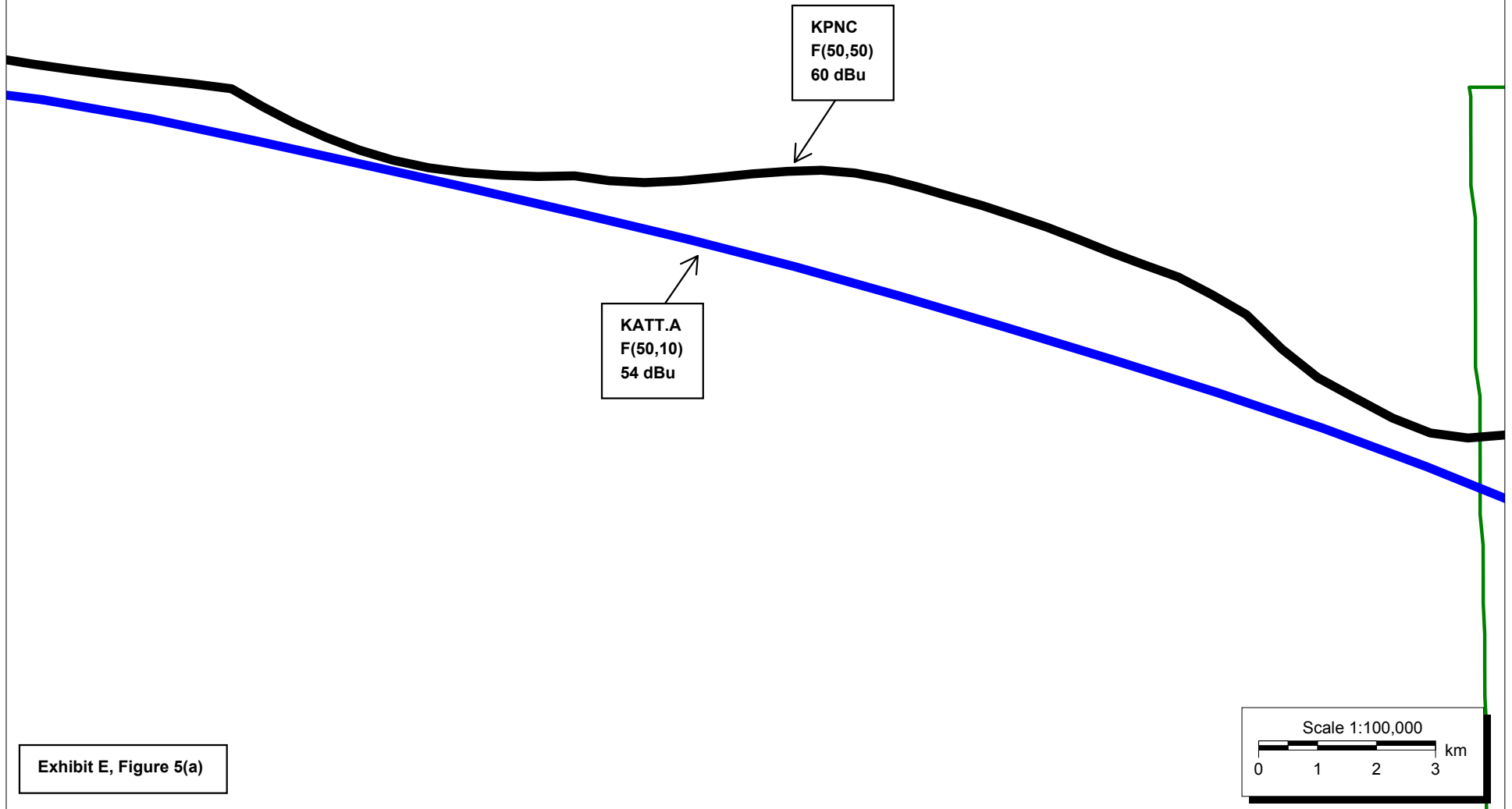


Exhibit E, Figure 5(a)