Educational Media Foundation **Exhibit 19**
5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765 **Dodge City, KS**

Compliance with 47 C.F.R. 73.525

Introduction

There are several considerations outlined in 47 C.F.R. 73.525 for TV channel 6 protection. Outlined below are the various factors as they apply to the proposed operation and KBSDTV.

Distance between proposed operation and KBSDTV

47 C.F.R. 73.525(a)(1) requires a minimum separation of 196 kilometers for a channel 210 operation. The distance between the proposed station and KBSDTV is 32.4 kilometers.

Population Limitation

When a proposed non-commercial station is not co-located with the channel 6 station in question, the applicant is required to show that the interference area (as predicted by the procedures outlined in 47 C.F.R. 73.525(e)(1)) contains no more than 3,000 persons. The actual population figures are contained in Exhibit 19-B, and a map of the interference area is shown in Exhibit 19-A.

Vertically Polarized Transmissions

When an applicant wishes to use vertically polarized transmissions only, C.F.R. 74.525(e)(4) limits the vertical ERP to the maximum permissible horizontally polarized ERP multiplied by 40 (if the predicted interference area lies entirely outside the limits of a city of 50,000 persons) or 10 (if not). The maximum permissible horizontally polarized ERP for the proposed facility is 2.5 kilowatts (See Exhibit 19-A). Since the predicted interference area lies entirely outside the limits of a city of 50,000 persons, that is multiplied by 40 to obtain the vertical-only ERP of 100 kilowatts specified in this application.

Discussion

Population in the predicted interference area was determined using the centroid method and the 2000 census. The predicted interference contour (of the theoretical horizontal component of 2.5 kilowatts) is contained within the KBSDTV channel 6 grade A (68 dBu F(50,50)) contour (see Exhibit 19-A).

The predicted interference contour is determined from 47 C.F.R. 73.599 for channel 210 to range from 70.5 dBu to 81.4 dBu. (See Exhibit 19-C for a tabulation of the KBSDTV protected contour values and the corresponding channel 210 interfering contours)

Exhibit 19-A shows the 68 dBu through 82 dBu F(50,50) contours for KBSDTV. Also shown are the corresponding F(50,10) interfering contours for the proposed channel 210 facility. This map also shows the interpolated interfering contour determined from

connecting the intersections of the KBSDTV protected contours and the corresponding interfering contours of the proposed facility (see 47 C.F.R 73.525(e)(1)(ii)).

Additionally shown in exhibit 19-A is a population scattergraph of the area of proposed operation. A population report of the area contained within the interpolated interfering contour is included at Exhibit 19-B. The total population contained within the interfering contour is 234 persons.

Conclusion

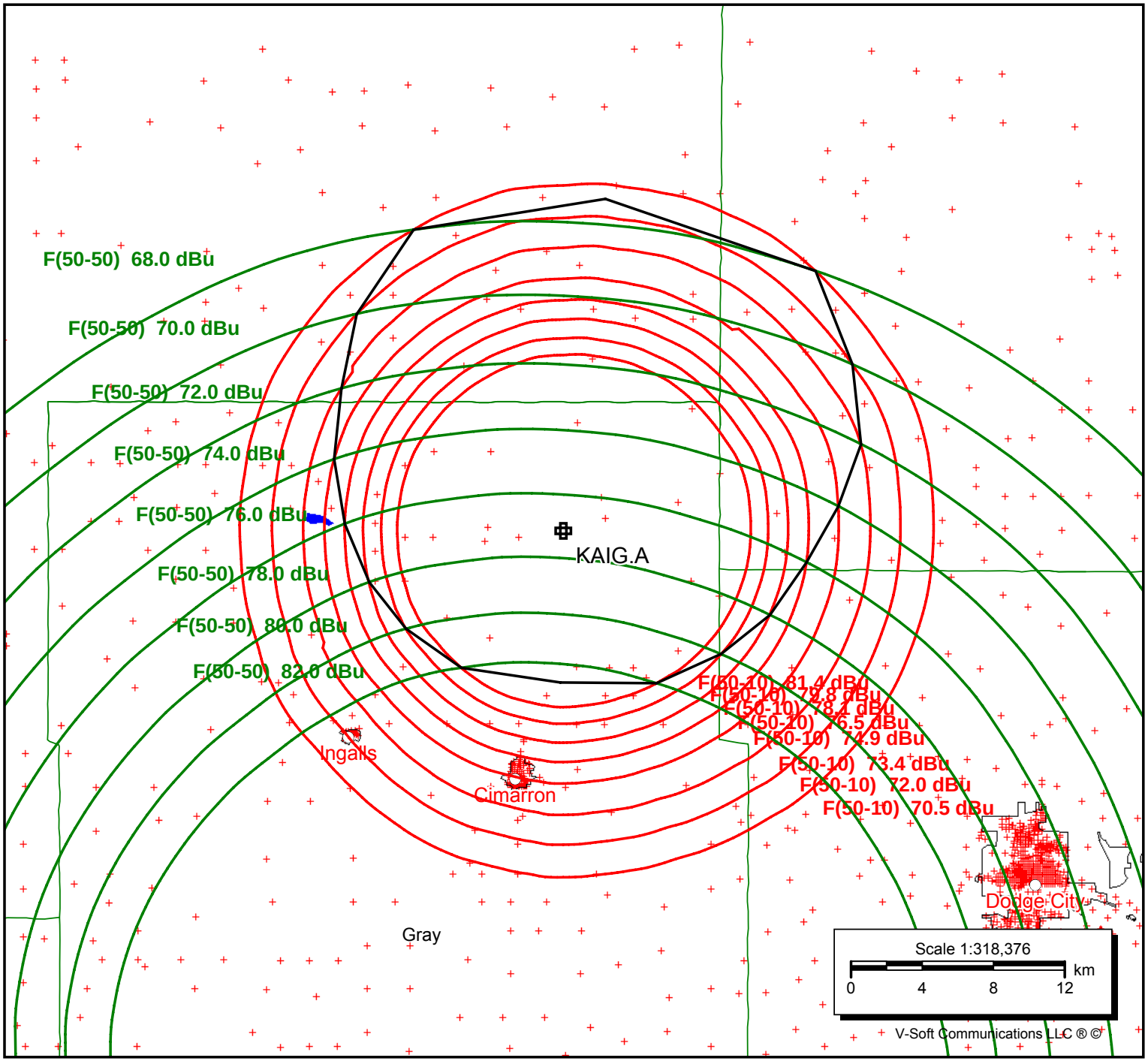
For the reasons outlined above, the proposed operation fully complies with the provisions of 47 C.F.R. 73.525.

Exhibit 19 - A

KAIG.A

Latitude: 37-55-56 N
Longitude: 100-19-02 W
ERP: 2.50 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 1032.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KBSDTV
BMLCT20040826AAG
Latitude: 37-38-28 N
Longitude: 100-20-39 W
ERP: 100.00 kW
Channel: 06+
Frequency: 85.5 MHz
AMSL Height: 1046.0 m
Horiz. Pattern: Omni
Vert. Pattern: Yes
Elec Tilt: 0.0



Population Report

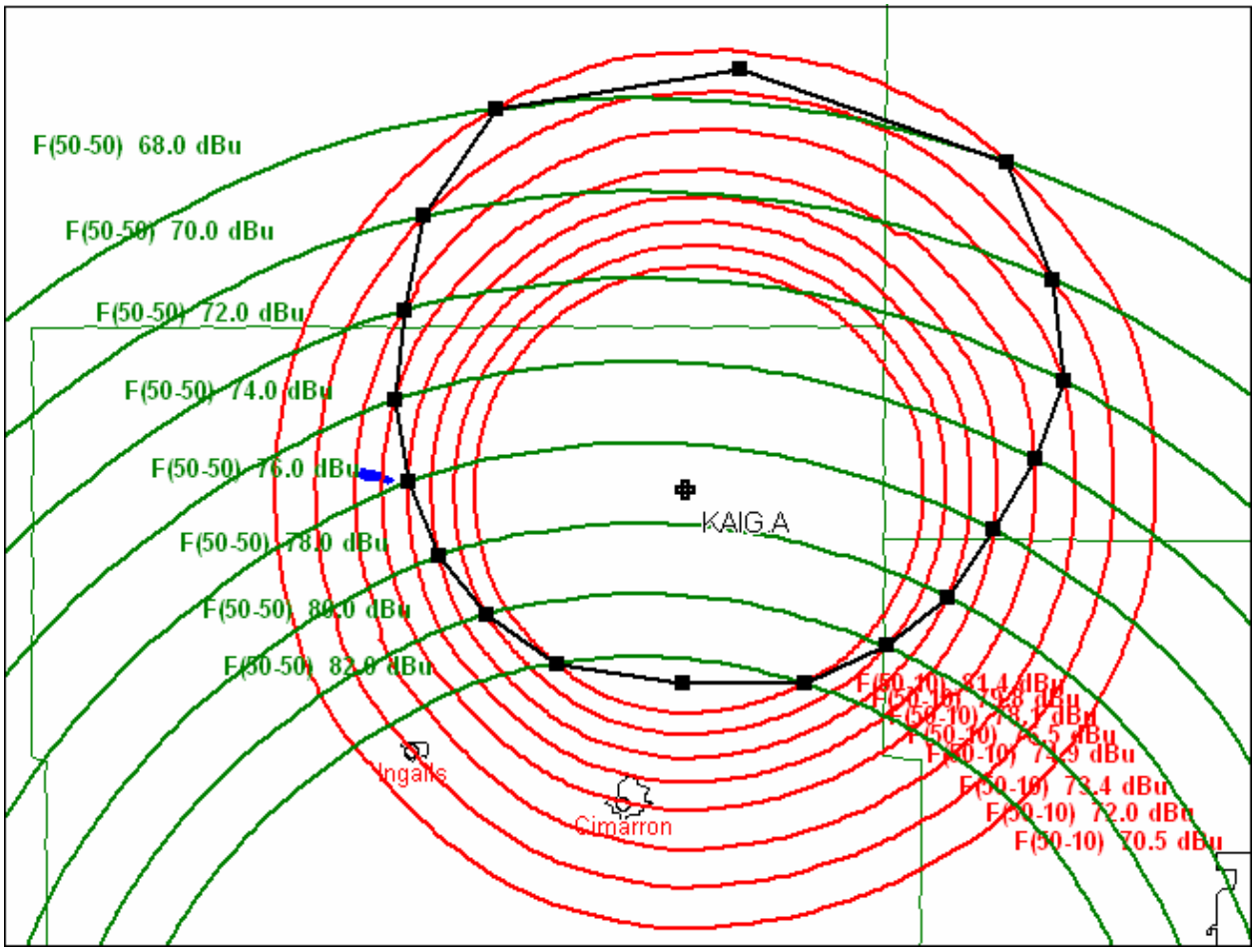
```
Polygon Population Report

Population Database: 2000 US Census (SF1)

Total Population: 234
Housing Units: 113
Polygon Area: 639.67 sq. km

-----------------------------------------------------------
```

Interpolated Interfering Contour



Channel 6 vs Channel 210

Channel 6 Contour	Value from 73.599	Channel 210 Contour
47 (grade B)	20.3	67.3
48	18.6	66.6
49	17.4	66.4
50	16.2	66.2
51	15	66
52	13.9	65.9
53	13	66
54	12	66
55	11.2	66.2
56	10.3	66.3
57	9.4	66.4
58	8.5	66.5
59	7.7	66.7
60	6.9	66.9
61	6.3	67.3
62	5.5	67.5
63	5	68
64	4.4	68.4
65	3.8	68.8
66	3.4	69.4
67	3	70

Channel 6 Contour	Value from 73.599	Channel 210 Contour
68 (grade A)	**2.5**	**70.5**
69	2.3	71.3
70	**2**	**72**
71	1.7	72.7
72	**1.4**	**73.4**
73	1.3	74.3
74	**0.9**	**74.9**
75	0.7	75.7
76	**0.5**	**76.5**
77	0.4	77.4
78	**0.1**	**78.1**
79	-0.1	78.9
80	**-0.2**	**79.8**
81	-0.4	80.6
82	**-0.6**	**81.4**
83	-0.7	82.3
84	-0.9	83.1
85	-1.1	83.9
86	-1.2	84.8
87	-1.4	85.6
88	-1.6	86.4
89	-1.7	87.3
90	-1.8	88.2