

CITY OF LICENSE
CALL LETTERS
FACILITY ID
PREPARED FOR
VERSION
JOB

Westley, CA
KCBP
184977
Modesto Peace/Life Center
1.0
118015

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

ENGINEERING STATEMENT
PROPOSED MINOR-CHANGE TO LICENSED STATION
KCBP, Westley, CA
95.5MHz - 6kW ERP - DA
Modesto Peace/Life Center

SUMMARY

Modesto Peace/Life Center (“MPLC”) hereby proposes to a minor-change to the licensed facilities of KCBP, Westley, CA. MPLC proposes to move to a hilltop site, changing the ERP, elevation, and antenna pattern.

This is a “commercial” band §73.215 proposal. Processing via this Rule section is hereby requested.

REQUEST FOR FULL-TIME OPERATION

The current KCPB license specifies a time-share with KTUR, Westley, CA (FID 185121). However, as shown by **Exhibit E-1**, the KTUR CP¹ expired on 8/12/18, and no application for a station license was filed. The CP was never built, and no arrangements were made to share the KCBP transmitter facility. MPLC hereby requests that the KTUR CP be cancelled, the call sign deleted, and that KCBP be granted a full-time CP.

If this request is deemed to be premature, MPLC will accept a CP with the technical parameters sought herein and the current time share provisions intact, and will request a full time authorization at a later date.

307(b) FAIR DISTRIBUTION OF SERVICE

KCBP is an NCE licensee on a “commercial” channel granted via the Third Channel Reservation Standard, in the 2010 Filing Window. As shown by **Exhibit E-2**, the 60dBu contour proposed herein covers 100% of the population centroids of the licensed 60dBu², and

¹BNPED-20100226AGO, Calvary Chapel of Turlock, Inc.

²2010 Census

therefore includes all first and second NCE areas to which this station is licensed to serve. With this proposal, the total 60dBu population will increase from 2,434, to 555,998 persons. The public interest will be well served by this very substantial improvement in coverage.

COMMUNITY COVERAGE

Exhibit 16 shows that the entire community of license is within the proposed 70dBu contour.

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EXHIBIT E-1

KTUR CP EXPIRED



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Application Search Details

File Number:	BNPED-20100226AGO
Call Sign:	KTUR
Facility Id:	185121
FRN:	0019603778
Applicant Name:	CALVARY CHAPEL OF TURLOCK, INC.
Frequency:	95.5
Channel:	238
Community of License:	WESTLEY, CA
Application Type:	ORIGINAL CONSTRUCTION PERMIT
Status:	GRANTED
Status Date:	08/12/2015
Expiration Date:	08/12/2018
NCE Supplement Date:	
Tolling Code:	
Application Service:	FM
Disposed Date:	08/12/2015
Accepted Date:	
Tendered Date:	08/28/2012
Amendment Received Date:	08/27/2012
Last Public Notice:	08/17/2015
Last Report Number:	48554
Authorization	View Authorization
Engineering Data	View Engineering Data
Legal Actions	View Legal Actions
PN Comment	Public Notice Comment
Correspondence Folder	View Correspondence Folder

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EXHIBIT E-1

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Search returned: 1 matching application

Application Search Results

File Number	Form	Paper/ Elect	Call Sign	Facility Id	Service	Status	Status Date	Details
BNPED 20100226AGO	340	E	KTUR	185121	FM	GRANTED	08/12/2015	Info Application

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Please send comments via standard mail to the Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, S.W., Washington, D.C., 20554. Questions can also be answered by calling the FCC's National Call Center, toll free, at 1-888-Call FCC (1-888-225-5322).

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Commission

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Washington, DC 20554

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The only KTUR CP issued was the original one, approved on 8/12/15. That CP has now expired with no application for a License to Cover being filed. No facility was built, and no arrangements were made to share the KCBP facility.

The applicant hereby requests that the KTUR permit be Cancelled, and the call sign Deleted.

Exhibit E-2

Proposed vs. Licensed 60dBu

Brown Broadcast Services, Inc.
Job: KCBP 2018.fmj
Master Database: 2018_Aug_18.fmd
Lat: N37:26:58 Lon: W121:11:14 NAD-27
Scale: 1:450000
Channel: 238 Class: A

rfInvestigator Version 3.8.16
by rfSoftware, Inc.
Date: 9/4/2018 12:47:36 AM

The proposed 60dBu contour covers 100% of the population centroids contained within the licensed 60dBu contour (2010 Census).

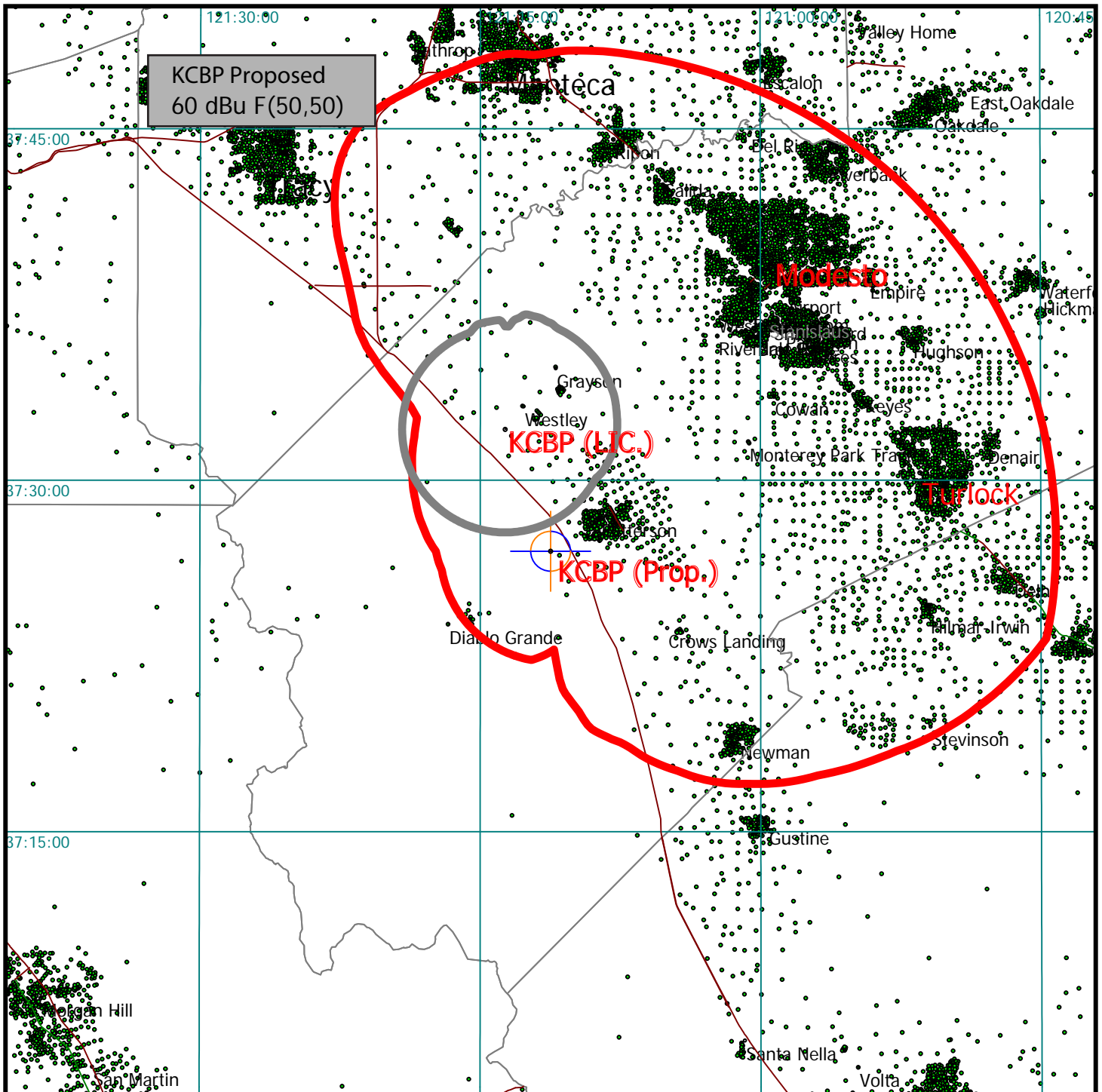


Exhibit 16

Community of License Coverage

Brown Broadcast Services, Inc.
Job: KCBP2018.fmj
Master Database: 2018_Aug_18.fmd
Lat: N37:26:58 Lon: W121:11:14 NAD-27
Scale: 1:250000
Channel: 238 Class: A

rfInvestigator Version 3.8.16
by rfSoftware, Inc.
Date: 9/4/2018 8:50:39 PM
Key:
City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

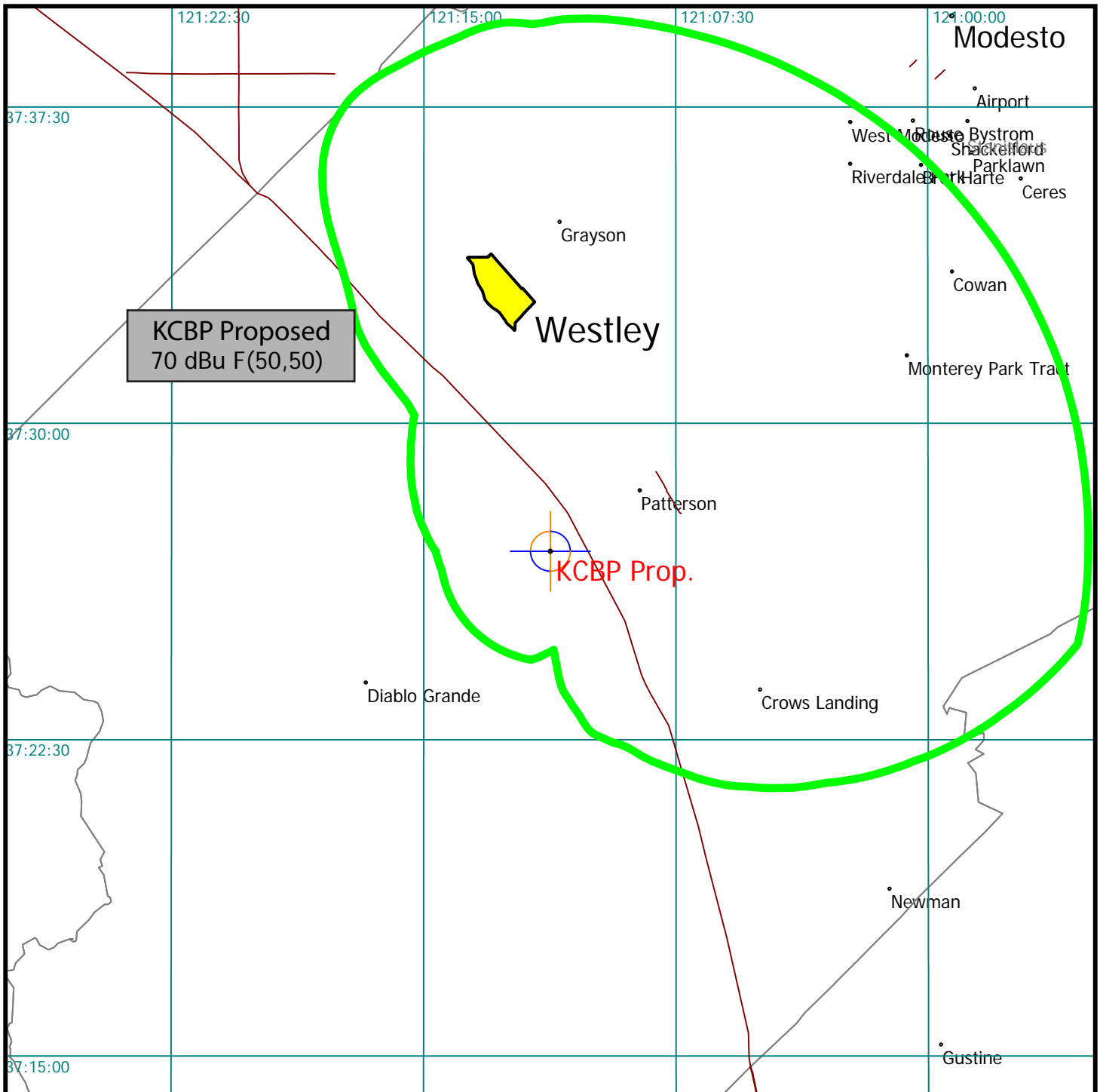


EXHIBIT 18

SPACING STUDY

CHANNEL STUDY

This proposal meets all 73.207 spacing requirements, except with respect to KKHK, Carmel, CA. KKHK-FM, however, is within the §73.215 spacing limits. Contour protection to this station is shown by **Exhibits 20 and 20a**. §73.215 processing with respect to KKHK is hereby requested.

Azevado Site_6kW Modesto Peace/Life Center CH# 238A - 95.5 MHz, Pwr= 6 kW DA, HAAT= 67.0 M, COR= 242 M Average Protected F(50-50)= 23.5 km 73.215 Directional											
REFERENCE 37 26 58.0 N. 121 11 14.0 W.											
DISPLAY DATES DATA 09-03-18 SEARCH 09-03-18											
CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
238A Westley	KTUR%	CP	ZCX CA	325.4 145.3	5.81 BNPED20100226AGO	37 29 33.0 121 13 29.0	2.800 142	92.4 344	34.6 Calvary Chapel	92.0R	-86.2M
238A Westley	KCBP!	LIC	NCN CA	339.6 159.6	10.26 BLED20180806AAT	37 32 10.0 121 13 40.0	0.420 -92	58	---Reference---		
238A Carmel	KKHK^	LIC	C CA	208.3 28.0	113.09 BMLH20050517ACN	36 33 09.0 121 47 17.0	6.000 100	102.7 335	39.9 Mapleton License	0.0	43.8 Of Monter
239B San Francisco	KGMZ-FM«	LIC	CN CA	284.0 103.3	113.55 BMLH19930914KB	37 41 23.0 122 26 12.0	6.900 393	83.2 450	69.3 Entercom License,	113.0R	0.55M Lic
237A Los Gatos	KRTY«	LIC	CN CA	248.2 67.8	72.76 BMLH19930521KA	37 12 17.0 121 56 56.0	0.870 262	59.8 575	38.6 Krtly, Ltd.	72.0R	0.8M
236B Oakdale	KHOP«	LIC	CN CA	56.8 237.2	70.23 BLH19850326KZ	37 47 34.0 120 31 08.0	29.500 193	7.5 433	76.7 Radio License	69.0R	1.2M Holding Cbc,
240A Livingston	KSKD«	LIC	CN CA	109.7 290.0	43.77 BLH19841113KK	37 18 57.0 120 43 20.0	3.000 93	2.2 126	23.9 Kskd, Inc.	31.0R	12.8M
238C Reno	KNEV«	LIC	CX NV	32.3 213.2	239.09 BMLH20170217AAW	39 15 34.0 119 42 16.0	71.000 695	200.6 2339	94.5 Radio License	226.0R	13.1M Holding Cbc,
240A Dos Palos NULL	KSKD«	RSV-A	CA	137.4 317.7	57.58 RM9857	37 04 03.0 120 44 52.0	6.000 100	2.8 137	29.4 Kskd, Inc.	31.0R	26.6M
241A Morgan Hill	KSQQ«	LIC	CN CA	241.7 61.3	62.00 BLH19940801KD	37 11 01.0 121 48 09.0	4.700 49	2.6 349	26.5 Coyote Communications, Inc	31.0R	31.0M
237B1 Vacaville	KUIC«	LIC	NCX CA	323.0 142.5	132.07 BMLH20150430ACI	38 23 42.0 122 05 57.0	0.490 617	62.0 877	46.6 Alpha Media Licensee	96.0R	36.1M Lic
235B San Francisco	KYLD«	LIC	CX CA	284.0 103.2	113.50 BMLH20080403ACF	37 41 22.0 122 26 10.0	30.000 369	8.2 425	83.1	69.0R	44.5M

Terrain database is FCC NGDC 30 Sec, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference Zone= - Zone 1A, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C, H, V, E), Beam tilt (Y, N, X)
***affixed to 'IN' or 'OUT' values = site inside restricted contour.
« = Station meets FCC minimum distance spacing for its class.
^ = Power and antenna height 'Max classed' as per Sec 73.215 protection requirements
% = This station is currently permitted as a time share with KCBP. CP has expired.

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The *IN* and *OUT* numbers indicated above for all but the first three entries, indicate the spacing margins using §73.207. For KKHK, it indicates the contour overlap margins for a station being processed under §73.215, with KKHK listed a maximum-class facility¹. KTUR, Westley, was granted a time share CP with KCBP, but the CP has now expired with no facility being built.

FMOver calculations were done using V-Soft FM Commander software, using “HAAT method 0 (zero)”, 51 data points per radial, and the FCC-modified version of the NGDC 30 second terrain database. According to V-Soft, this combination results in “astounding agreement” with FCC software.

PROTECTED ZONES REPORT

Protected zones report for KCBP on channel 238A 09-03-2018
Lat. 37 26 58.0 Lng. 121 11 14.0, ERP= 6 kw, HAAT= 67 m

Facility is okay with respect to AM station towers.

Closest AM Facility is KVIN, CERES, CA, L, DA2 at 32.0° at a distance of 19.3 km
Facility is okay with respect to FCC monitoring stations.

Closest FCC Monitoring Station is 58.6 km= Livermore, CA

¹Class A, 100m HAAT, 6kW ERP

EXHIBIT 20

§73.215 Contour Protection to KKHK, Carmel, CA

Avezado Site_6kW
Modesto Peace/life Center

FMCommander Single Allocation Study - 09-03-2018 - FCC NGDC 30 Sec
KCBP's Overlaps (In= 0.03 km, Out= 43.79 km)

KCBP CH 238 A 73.215 Z
Lat= 37 26 58.0, Lng= 121 11 14.0
6.0 kW 67 m HAAT, 242 m COR
Prot.= 60 dBu, Intef.= 40 dBu

KKHK^ CH 238 A BMLH20050517ACN
Lat= 36 33 09.0, Lng= 121 47 17.0
Max Cls: 6.0 kW 100 m HAAT, 335 m COR
Prot.= 60 dBu, Intef.= 40 dBu

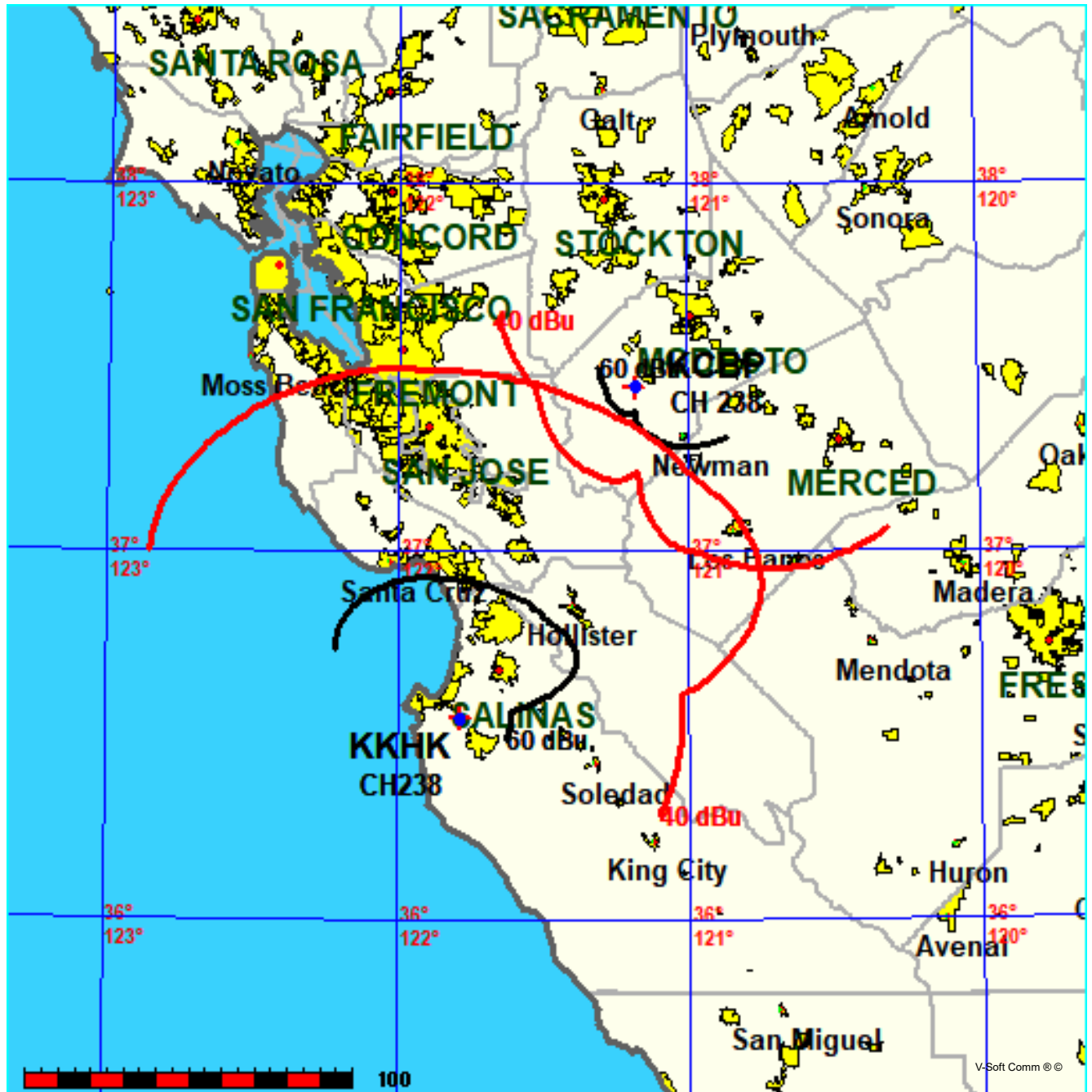


EXHIBIT 20a

FM OVER REPORT WITH KKHK, Carmel, CA

09-03-2018 Terrain Data: FCC NGDC 30 Sec FMOver Analysis

KCBP

Channel = 238A
Max ERP = 6 kW
RCAMSL = 241.98 m
N. Lat. 37 26 58.0
W. Lng. 121 11 14.0
Protected
60 dBu

KKHK BMLH20050517ACN
(^ Max Class Parameters)
Channel = 238A
Max ERP = 6 kW
RCAMSL = 335 m
N. Lat. 36 33 09.0
W. Lng. 121 47 17.0
Interfering
40 dBu

Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Actual (dBu)	I X (km)
163.0	000.3427	0120.9	015.4	034.1	006.0000	0216.2	102.9	39.93	
164.0	000.3285	0119.9	015.1	033.9	006.0000	0216.4	102.8	39.95	
165.0	000.3146	0119.1	014.9	033.7	006.0000	0216.6	102.8	39.97	
166.0	000.2984	0118.5	014.6	033.5	006.0000	0216.8	102.7	39.98	
167.0	000.2851	0117.3	014.4	033.3	006.0000	0216.9	102.7	39.99	
168.0	000.2722	0113.9	014.0	033.0	006.0000	0217.1	102.8	39.97	
169.0	000.2571	0108.3	013.5	032.7	006.0000	0217.3	103.0	39.92	
170.0	000.2448	0100.9	012.9	032.4	006.0000	0217.5	103.3	39.84	
171.0	000.2571	0092.1	012.4	032.1	006.0000	0217.5	103.5	39.80	
172.0	000.2697	0083.9	012.0	031.9	006.0000	0217.5	103.6	39.76	
173.0	000.2825	0076.3	011.7	031.7	006.0000	0217.5	103.8	39.71	
174.0	000.2957	0070.0	011.3	031.5	006.0000	0217.5	103.9	39.67	
175.0	000.3092	0063.0	010.9	031.3	006.0000	0217.4	104.1	39.62	
176.0	000.3257	0053.2	010.2	031.0	006.0000	0217.2	104.6	39.49	
177.0	000.3399	0040.7	009.0	030.5	006.0000	0216.8	105.5	39.21	
178.0	000.3543	0028.7	007.7	030.1	006.0000	0216.4	106.5	38.96	
179.0	000.3690	0021.4	007.8	030.0	006.0000	0216.3	106.3	38.99	
180.0	000.3841	0016.6	007.9	030.0	006.0000	0216.3	106.2	39.03	
181.0	000.3994	0011.7	008.0	029.9	006.0000	0216.3	106.1	39.06	
182.0	000.4150	0005.9	008.1	029.9	006.0000	0216.2	105.9	39.10	
183.0	000.4309	-0001.6	008.2	029.9	006.0000	0216.2	105.8	39.14	
184.0	000.4472	-0011.6	008.2	029.8	006.0000	0216.1	105.6	39.17	
185.0	000.4604	-0022.2	008.3	029.8	006.0000	0216.1	105.5	39.20	
186.0	000.4771	-0031.4	008.4	029.7	006.0000	0216.0	105.4	39.24	
187.0	000.4942	-0039.0	008.5	029.6	006.0000	0216.0	105.2	39.27	
188.0	000.5116	-0048.7	008.6	029.6	006.0000	0215.9	105.1	39.30	
189.0	000.5293	-0058.9	008.6	029.5	006.0000	0215.9	105.0	39.34	
190.0	000.5472	-0066.3	008.7	029.5	006.0000	0215.8	104.9	39.37	
191.0	000.5472	-0065.6	008.7	029.4	006.0000	0215.7	104.8	39.38	
192.0	000.5472	-0066.3	008.7	029.3	006.0000	0215.7	104.8	39.39	
193.0	000.5472	-0073.8	008.7	029.2	006.0000	0215.6	104.7	39.40	
194.0	000.5472	-0084.3	008.7	029.1	006.0000	0215.5	104.7	39.41	
195.0	000.5472	-0090.4	008.7	029.1	006.0000	0215.5	104.6	39.42	
196.0	000.5472	-0092.4	008.7	029.0	006.0000	0215.4	104.6	39.43	
197.0	000.5472	-0089.8	008.7	028.9	006.0000	0215.3	104.6	39.43	
198.0	000.5472	-0084.5	008.7	028.8	006.0000	0215.3	104.5	39.44	
199.0	000.5472	-0080.2	008.7	028.7	006.0000	0215.2	104.5	39.45	
200.0	000.5472	-0079.8	008.7	028.7	006.0000	0215.2	104.5	39.45	
201.0	000.5472	-0083.6	008.7	028.6	006.0000	0215.1	104.5	39.45	
202.0	000.5472	-0087.9	008.7	028.5	006.0000	0215.0	104.4	39.46	
203.0	000.5472	-0092.5	008.7	028.4	006.0000	0215.0	104.4	39.46	
204.0	000.5472	-0097.0	008.7	028.3	006.0000	0214.9	104.4	39.46	
205.0	000.5472	-0101.1	008.7	028.2	006.0000	0214.8	104.4	39.46	
206.0	000.5472	-0105.8	008.7	028.2	006.0000	0214.8	104.4	39.46	
207.0	000.5472	-0112.7	008.7	028.1	006.0000	0214.7	104.4	39.46	
208.0	000.5472	-0119.8	008.7	028.0	006.0000	0214.6	104.4	39.46	
209.0	000.5472	-0125.1	008.7	027.9	006.0000	0214.6	104.4	39.46	
210.0	000.5472	-0129.1	008.7	027.8	006.0000	0214.5	104.4	39.46	
211.0	000.5472	-0133.8	008.7	027.7	006.0000	0214.5	104.4	39.45	
212.0	000.5472	-0139.6	008.7	027.7	006.0000	0214.4	104.4	39.45	
213.0	000.5472	-0144.3	008.7	027.6	006.0000	0214.3	104.4	39.44	
214.0	000.5472	-0147.0	008.7	027.5	006.0000	0214.3	104.4	39.44	
215.0	000.5472	-0148.8	008.7	027.4	006.0000	0214.2	104.4	39.43	
216.0	000.5472	-0151.0	008.7	027.3	006.0000	0214.2	104.5	39.42	
217.0	000.5472	-0154.1	008.7	027.2	006.0000	0214.1	104.5	39.42	

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218.0	000.5472	-0157.2	008.7	027.2	006.0000	0214.1	104.5	39.41
219.0	000.5472	-0160.6	008.7	027.1	006.0000	0214.0	104.5	39.40
220.0	000.5472	-0163.8	008.7	027.0	006.0000	0214.0	104.6	39.39
221.0	000.5472	-0166.2	008.7	026.9	006.0000	0213.9	104.6	39.38
222.0	000.5472	-0166.7	008.7	026.8	006.0000	0213.9	104.7	39.37
223.0	000.5472	-0163.3	008.7	026.8	006.0000	0213.8	104.7	39.35
224.0	000.5472	-0158.9	008.7	026.7	006.0000	0213.8	104.7	39.34
225.0	000.5472	-0156.8	008.7	026.6	006.0000	0213.7	104.8	39.33
226.0	000.5472	-0158.8	008.7	026.5	006.0000	0213.6	104.8	39.31
227.0	000.5472	-0163.9	008.7	026.4	006.0000	0213.6	104.9	39.30
228.0	000.5472	-0170.9	008.7	026.4	006.0000	0213.5	104.9	39.28
229.0	000.5472	-0176.0	008.7	026.3	006.0000	0213.5	105.0	39.26
230.0	000.5472	-0177.4	008.7	026.2	006.0000	0213.4	105.0	39.25
231.0	000.5472	-0176.2	008.7	026.1	006.0000	0213.4	105.1	39.23
232.0	000.5472	-0176.0	008.7	026.1	006.0000	0213.3	105.2	39.21
233.0	000.5472	-0179.1	008.7	026.0	006.0000	0213.3	105.2	39.19
234.0	000.5472	-0186.6	008.7	025.9	006.0000	0213.2	105.3	39.17
235.0	000.5472	-0195.8	008.7	025.8	006.0000	0213.2	105.4	39.15
236.0	000.5472	-0205.7	008.7	025.8	006.0000	0213.1	105.5	39.13
237.0	000.5472	-0216.1	008.7	025.7	006.0000	0213.1	105.5	39.10
238.0	000.5472	-0225.7	008.7	025.6	006.0000	0213.0	105.6	39.08
239.0	000.5472	-0232.2	008.7	025.6	006.0000	0213.0	105.7	39.06
240.0	000.5472	-0234.9	008.7	025.5	006.0000	0212.9	105.8	39.04
241.0	000.5472	-0235.2	008.7	025.4	006.0000	0212.9	105.9	39.01
242.0	000.5472	-0236.2	008.7	025.4	006.0000	0212.8	106.0	38.99
243.0	000.5472	-0239.5	008.7	025.3	006.0000	0212.8	106.0	38.96
244.0	000.5472	-0245.6	008.7	025.2	006.0000	0212.8	106.1	38.94
245.0	000.5472	-0253.8	008.7	025.2	006.0000	0212.7	106.2	38.91
246.0	000.5472	-0261.1	008.7	025.1	006.0000	0212.7	106.3	38.88
247.0	000.5472	-0265.2	008.7	025.0	006.0000	0212.6	106.4	38.86
248.0	000.5472	-0267.2	008.7	025.0	006.0000	0212.6	106.5	38.83
249.0	000.5472	-0266.9	008.7	024.9	006.0000	0212.6	106.6	38.80
250.0	000.5472	-0265.7	008.7	024.9	006.0000	0212.5	106.7	38.77
251.0	000.5472	-0265.2	008.7	024.8	006.0000	0212.5	106.9	38.74
252.0	000.5472	-0263.8	008.7	024.7	006.0000	0212.4	107.0	38.71

09-03-2018 Terrain Data: FCC NGDC 30 Sec FMOver Analysis

KKHK BMLH20050517ACN
 (^ Max Class Parameters)
 Channel = 238A
 Max ERP = 6 kW
 RCAMSL = 335 m
 N. Lat. 36 33 09.0
 W. Lng. 121 47 17.0
 Protected
 60 dBu

KCBP
 Channel = 238A
 Max ERP = 6 kW
 RCAMSL = 241.98 m
 N. Lat. 37 26 58.0
 W. Lng. 121 11 14.0
 Interfering
 40 dBu

Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Actual (dBu)	I X (km)
343.0	006.0000	0273.5	043.8	229.0	000.5472	-0176.0	087.7	25.86	
344.0	006.0000	0271.6	043.7	228.7	000.5472	-0175.0	087.1	26.00	
345.0	006.0000	0269.2	043.5	228.4	000.5472	-0173.5	086.5	26.12	
346.0	006.0000	0266.5	043.4	228.1	000.5472	-0171.3	085.9	26.25	
347.0	006.0000	0263.8	043.2	227.7	000.5472	-0168.9	085.3	26.36	
348.0	006.0000	0261.1	043.0	227.4	000.5472	-0166.5	084.8	26.48	
349.0	006.0000	0258.7	042.9	227.0	000.5472	-0163.9	084.2	26.59	
350.0	006.0000	0255.6	042.7	226.6	000.5472	-0161.5	083.7	26.70	
351.0	006.0000	0251.1	042.4	226.2	000.5472	-0159.4	083.2	26.79	
352.0	006.0000	0246.2	042.1	225.7	000.5472	-0157.7	082.8	26.88	
353.0	006.0000	0242.4	041.8	225.2	000.5472	-0156.8	082.4	26.96	
354.0	006.0000	0240.0	041.7	224.8	000.5472	-0157.0	081.9	27.06	
355.0	006.0000	0238.3	041.6	224.5	000.5472	-0157.6	081.4	27.16	
356.0	006.0000	0236.7	041.5	224.1	000.5472	-0158.7	080.9	27.25	
357.0	006.0000	0235.5	041.4	223.7	000.5472	-0160.2	080.5	27.35	
358.0	006.0000	0234.2	041.3	223.3	000.5472	-0162.0	080.0	27.44	
359.0	006.0000	0232.6	041.2	222.8	000.5472	-0164.1	079.6	27.52	
000.0	006.0000	0230.9	041.1	222.4	000.5472	-0165.7	079.2	27.60	
001.0	006.0000	0229.2	041.0	222.0	000.5472	-0166.8	078.8	27.68	

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002.0	006.0000	0227.6	040.9	221.5	000.5472	-0166.8	078.4	27.75
003.0	006.0000	0226.4	040.8	221.1	000.5472	-0166.3	078.0	27.82
004.0	006.0000	0225.3	040.7	220.6	000.5472	-0165.4	077.7	27.89
005.0	006.0000	0224.5	040.6	220.2	000.5472	-0164.3	077.3	27.96
006.0	006.0000	0224.4	040.6	219.7	000.5472	-0163.0	076.9	28.04
007.0	006.0000	0223.8	040.6	219.3	000.5472	-0161.5	076.6	28.10
008.0	006.0000	0222.9	040.5	218.8	000.5472	-0159.9	076.3	28.16
009.0	006.0000	0221.7	040.4	218.3	000.5472	-0158.3	076.0	28.21
010.0	006.0000	0220.7	040.4	217.8	000.5472	-0156.5	075.7	28.26
011.0	006.0000	0220.4	040.4	217.3	000.5472	-0155.0	075.4	28.32
012.0	006.0000	0220.4	040.4	216.8	000.5472	-0153.6	075.1	28.37
013.0	006.0000	0219.7	040.3	216.3	000.5472	-0151.9	074.9	28.41
014.0	006.0000	0218.3	040.2	215.8	000.5472	-0150.5	074.7	28.45
015.0	006.0000	0216.2	040.0	215.2	000.5472	-0149.2	074.6	28.46
016.0	006.0000	0214.4	039.9	214.7	000.5472	-0148.2	074.5	28.48
017.0	006.0000	0213.4	039.8	214.2	000.5472	-0147.3	074.4	28.51
018.0	006.0000	0212.9	039.8	213.7	000.5472	-0146.3	074.2	28.54
019.0	006.0000	0212.6	039.8	213.1	000.5472	-0144.7	074.1	28.57
020.0	006.0000	0212.3	039.8	212.6	000.5472	-0142.8	073.9	28.59
021.0	006.0000	0211.9	039.7	212.1	000.5472	-0140.0	073.8	28.61
022.0	006.0000	0211.6	039.7	211.5	000.5472	-0136.8	073.7	28.63
023.0	006.0000	0211.6	039.7	211.0	000.5472	-0133.8	073.6	28.65
024.0	006.0000	0212.0	039.7	210.5	000.5472	-0131.2	073.5	28.67
025.0	006.0000	0212.6	039.8	209.9	000.5472	-0128.8	073.4	28.69
026.0	006.0000	0213.3	039.8	209.4	000.5472	-0126.6	073.3	28.70
027.0	006.0000	0214.0	039.9	208.9	000.5472	-0124.4	073.2	28.72
028.0	006.0000	0214.6	039.9	208.3	000.5472	-0121.7	073.2	28.73
029.0	006.0000	0215.4	040.0	207.8	000.5472	-0118.2	073.1	28.74
030.0	006.0000	0216.3	040.1	207.2	000.5472	-0114.3	073.1	28.74
031.0	006.0000	0217.2	040.1	206.7	000.5472	-0110.2	073.1	28.75
032.0	006.0000	0217.5	040.1	206.1	000.5472	-0106.5	073.1	28.74
033.0	006.0000	0217.2	040.1	205.6	000.5472	-0103.5	073.2	28.72
034.0	006.0000	0216.3	040.1	205.0	000.5472	-0101.2	073.4	28.69
035.0	006.0000	0215.5	040.0	204.5	000.5472	-0099.1	073.6	28.66
036.0	006.0000	0215.2	040.0	204.0	000.5472	-0096.9	073.7	28.63
037.0	006.0000	0215.1	040.0	203.5	000.5472	-0094.5	073.9	28.60
038.0	006.0000	0214.7	039.9	202.9	000.5472	-0092.2	074.1	28.56
039.0	006.0000	0213.5	039.9	202.4	000.5472	-0090.0	074.4	28.51
040.0	006.0000	0211.7	039.7	202.0	000.5472	-0087.8	074.7	28.45
041.0	006.0000	0209.7	039.6	201.5	000.5472	-0085.7	075.1	28.38
042.0	006.0000	0208.2	039.5	201.0	000.5472	-0083.7	075.4	28.32
043.0	006.0000	0207.6	039.4	200.6	000.5472	-0081.8	075.7	28.26
044.0	006.0000	0207.8	039.4	200.1	000.5472	-0080.0	076.0	28.21
045.0	006.0000	0209.1	039.5	199.6	000.5472	-0079.4	076.2	28.17
046.0	006.0000	0211.1	039.7	199.1	000.5472	-0080.0	076.4	28.14
047.0	006.0000	0213.9	039.9	198.5	000.5472	-0081.8	076.5	28.11
048.0	006.0000	0217.0	040.1	198.0	000.5472	-0084.5	076.7	28.09
049.0	006.0000	0220.3	040.3	197.5	000.5472	-0087.6	076.8	28.06
050.0	006.0000	0223.7	040.6	196.9	000.5472	-0090.1	077.0	28.02
051.0	006.0000	0227.0	040.8	196.4	000.5472	-0091.8	077.2	27.98
052.0	006.0000	0229.6	041.0	195.9	000.5472	-0092.4	077.5	27.93
053.0	006.0000	0230.7	041.1	195.4	000.5472	-0091.8	077.8	27.86
054.0	006.0000	0230.4	041.0	195.0	000.5472	-0090.5	078.3	27.77
055.0	006.0000	0229.0	041.0	194.7	000.5472	-0088.8	078.8	27.67
056.0	006.0000	0228.0	040.9	194.3	000.5472	-0086.6	079.4	27.57
057.0	006.0000	0227.3	040.8	194.0	000.5472	-0083.9	079.9	27.46
058.0	006.0000	0227.4	040.8	193.6	000.5472	-0080.5	080.4	27.37
059.0	006.0000	0226.6	040.8	193.3	000.5472	-0076.9	080.9	27.26
060.0	006.0000	0224.9	040.7	193.0	000.5472	-0073.6	081.5	27.14
061.0	006.0000	0222.4	040.5	192.7	000.5472	-0071.1	082.2	27.01
062.0	006.0000	0219.4	040.3	192.5	000.5472	-0069.2	082.8	26.87
063.0	006.0000	0215.7	040.0	192.4	000.5472	-0068.0	083.5	26.73
064.0	006.0000	0211.7	039.7	192.2	000.5472	-0067.2	084.3	26.58
065.0	006.0000	0207.2	039.4	192.1	000.5472	-0066.7	085.0	26.42
066.0	006.0000	0202.1	039.0	192.1	000.5472	-0066.5	085.8	26.26
067.0	006.0000	0196.0	038.5	192.1	000.5472	-0066.5	086.6	26.09
068.0	006.0000	0188.4	037.9	192.2	000.5472	-0066.8	087.5	25.91
069.0	006.0000	0179.8	037.2	192.3	000.5472	-0067.6	088.5	25.71
070.0	006.0000	0170.7	036.3	192.6	000.5472	-0069.4	089.5	25.50
071.0	006.0000	0161.1	035.3	192.9	000.5472	-0072.5	090.5	25.29
072.0	006.0000	0151.2	034.2	193.3	000.5472	-0077.0	091.6	25.06

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EXHIBIT 24

ENVIRONMENTAL PROTECTION ACT / NIER ANALYSIS

An Environmental Assessment is categorically excluded for this proposal in that no part of 47CFR §1.1307(a)(1) through (8) applies in this case, and RF exposures do not exceed FCC standards.

The applicant proposes mounting a new directional antenna on a 20 meter monopole. The proposed center of radiation is 13m AGL. A 4 bay 0.75 wave-spaced PSI FML-4A-DA antenna is proposed. The site is a remote rural hilltop used for cattle grazing, is on private land, and is completely surrounded by perimeter fencing hundreds of feet away from the site. Access to the area can only be achieved by passing through locked gates. There are no other structures or RF facilities in the vicinity.

Calculations were made using FM Model (online version), using the appropriate "Type-2" setting. FM Model predicted a peak exposure of $63.7\mu\text{W}/\text{cm}^2$, at 7 meters from the tower. This represents 6.37% of the Maximum Permissible Exposure (MPE) of $1000\mu\text{W}/\text{cm}^2$ for controlled/occupational environments.

A local fence will immediately surround the monopole and the associated equipment shed, further thwarting unauthorized access. The site will be posted with appropriate RF exposure warning signs. If monopole 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.

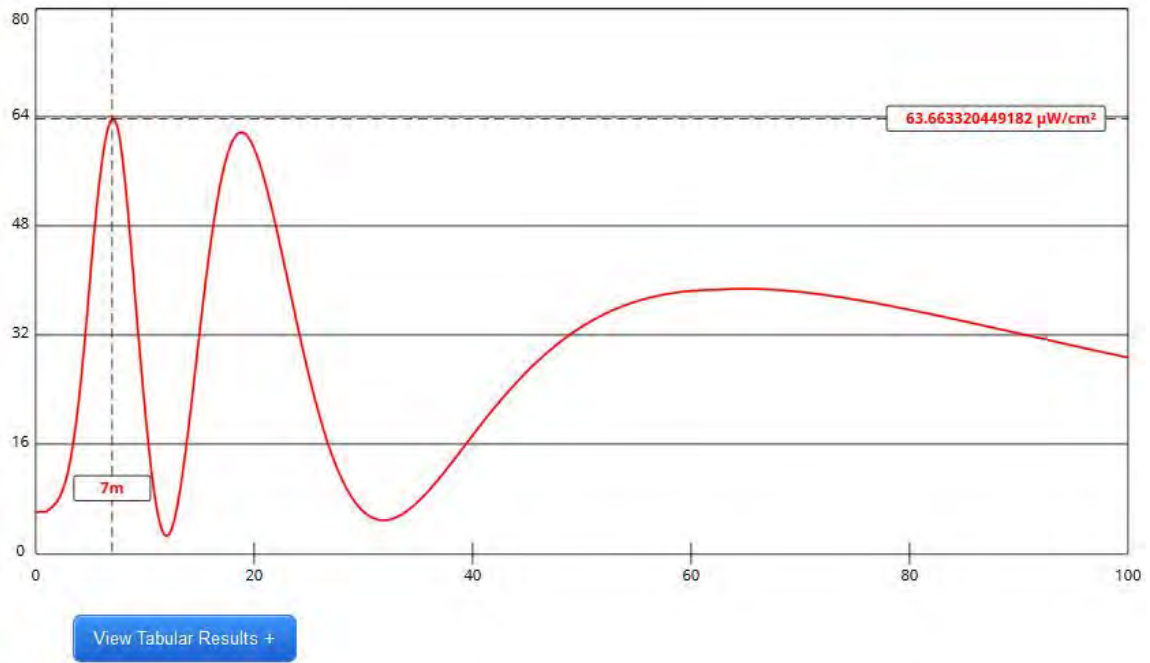
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Channel Selection	Channel 258 (99.5 MHz) ▾		
Antenna Type +	EPA Type 2: Opposed V Dipole ▾		
Height (m)	13	Distance (m)	100
ERP-H (W)	6000	ERP-V (W)	6000
Num of Elements	4	Element Spacing (λ)	0.75
Num of Points	500	Apply	

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