TECHNICAL EXHIBIT
MINOR MODIFICATION APPLICATION
NEW FM STATION (FACILITY ID 170999)
LOWRY CITY, MISSOURI

JULY 31, 2009

CH 285A 1.1 KW 127 M

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Technical Narrative

This Technical Exhibit was prepared on behalf of a new FM station at Lowry City, Missouri, resulting from FCC Auction 70 (MM-FM554-A). A subsequent "long-form" application was also timely filed (BNPH-20070419AEP).

This modification is intended to modify the transmitter site coordinates, decrease effective radiated power (ERP) and increase antenna height above average terrain (HAAT) for the proposal. FCC Section 73.215 processing is also requested.

Proposed Facilities

This application proposes to construct a Class A facility at the following site coordinates (NAD27): 38-09-08 N, 93-39-43 W (see Figure 1). It is proposed to operate with a non-directional ERP of 1.1 kW and antenna HAAT of 127 meters (less than maximum Class A facilities). A sketch of the proposed structure is shown in Figure 2. The Federal Aviation Administration (FAA) is being notified of the proposed structure. When a *Determination of No Hazard* is issued, the tower will be registered with the FCC.

Interference Concerns

The 115 dBu predicted "blanketing" contour of the proposed station is predicted to extend radially 0.4 kilometer from the transmitting site. No interference is expected. However, the applicant recognizes its responsibility to resolve complaints of interference, including blanketing and receiver-induced interference as required by Sections 73.315(b), 73.316(e) and 73.318.

Proposed Coverage Analysis

Figure 3 is a map showing the predicted FCC coverage contours for the proposed operation. The FCC predicted 70 dBu coverage contour will encompass the entire Lowry City limits as derived from 2000 U.S. Census data.

The overall average HAAT (127 meters, rounded to the nearest meter) was determined using the N.G.D.C. 30-second terrain database and 8 evenly spaced radials (every 45 degrees of azimuth).

Allocation Study

Figure 4 is an allocation study for channel 285A from the proposed allotment reference point coordinates. The allotment reference point meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations. The allotment reference point is that of ASRN 1012449.

Sheet 1 of Figure 5 is an allocation study for channel 285A from the proposed site. As indicated the proposed site meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations except to a station KCJK, on channel 286C1 at Garden City, Missouri. There are no other allocation issues.

Processing pursuant to the short-spacing provisions is requested with respect to station KCJK. Station KCJK is being protected using contour overlap procedures (see Figure 5). The protected and interfering contours for KCJK were generated using maximum equivalent Class C1 facilities (100 kW/299 meters).

Radiofrequency Electromagnetic Field Exposure

The proposed FM facility was evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. Based on the FCC's FM Model program using a 4-bay "rototiller" antenna, the calculated power density at a point 2 meters above ground level will not exceed 0.006 mW/cm^2, which is less than 5% of the FCC's recommended limit of 0.2 mW/cm^2 for FM channels, applicable to general population/uncontrolled exposure areas.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the station is at reduced power or shut down. The proposed operation appears to be otherwise categorically excluded from environmental processing.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner.

Jonathan N. Edwards

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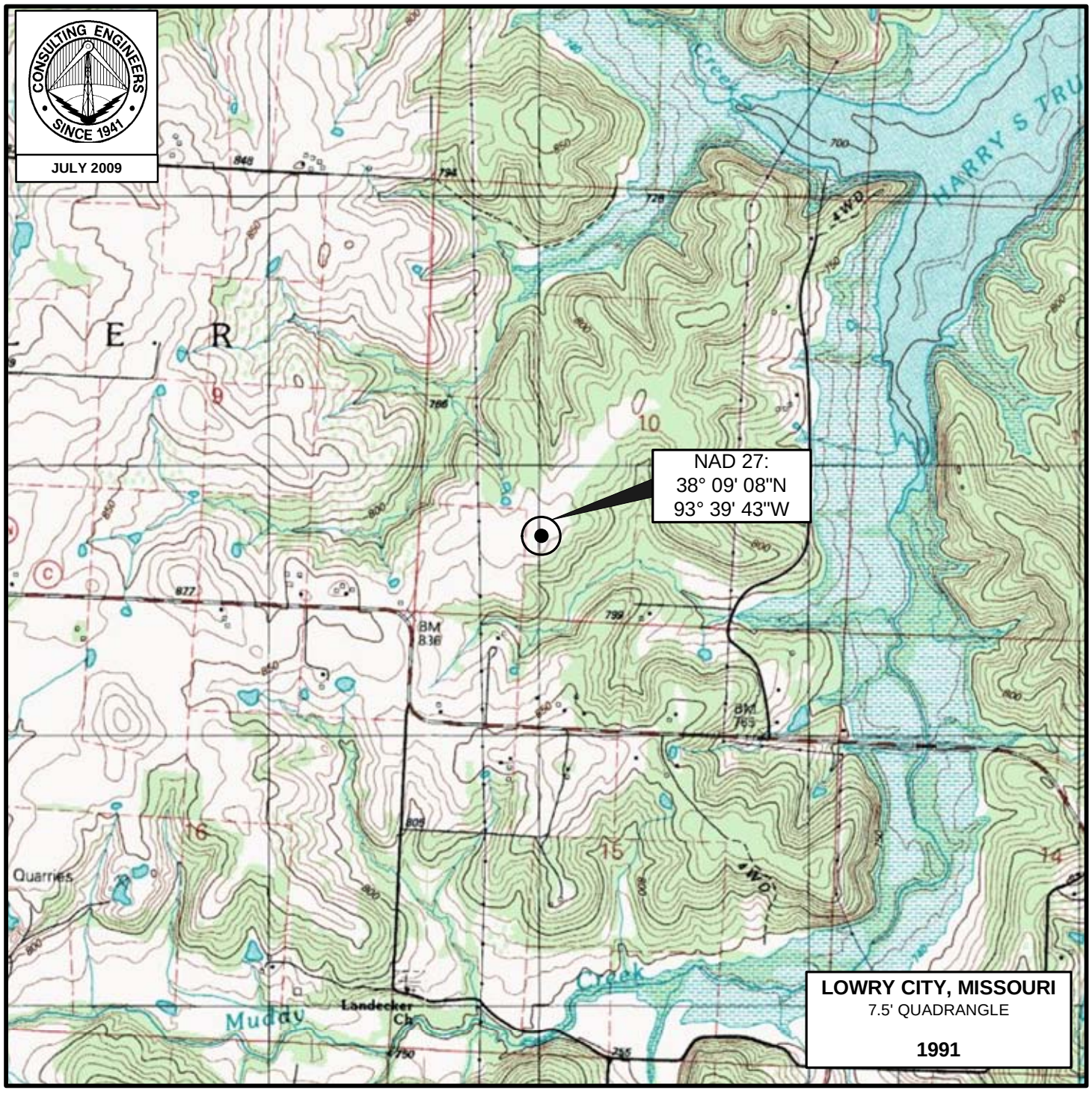
July 31, 2009

Figure 1



PROPOSED TRANSMITTER SITE

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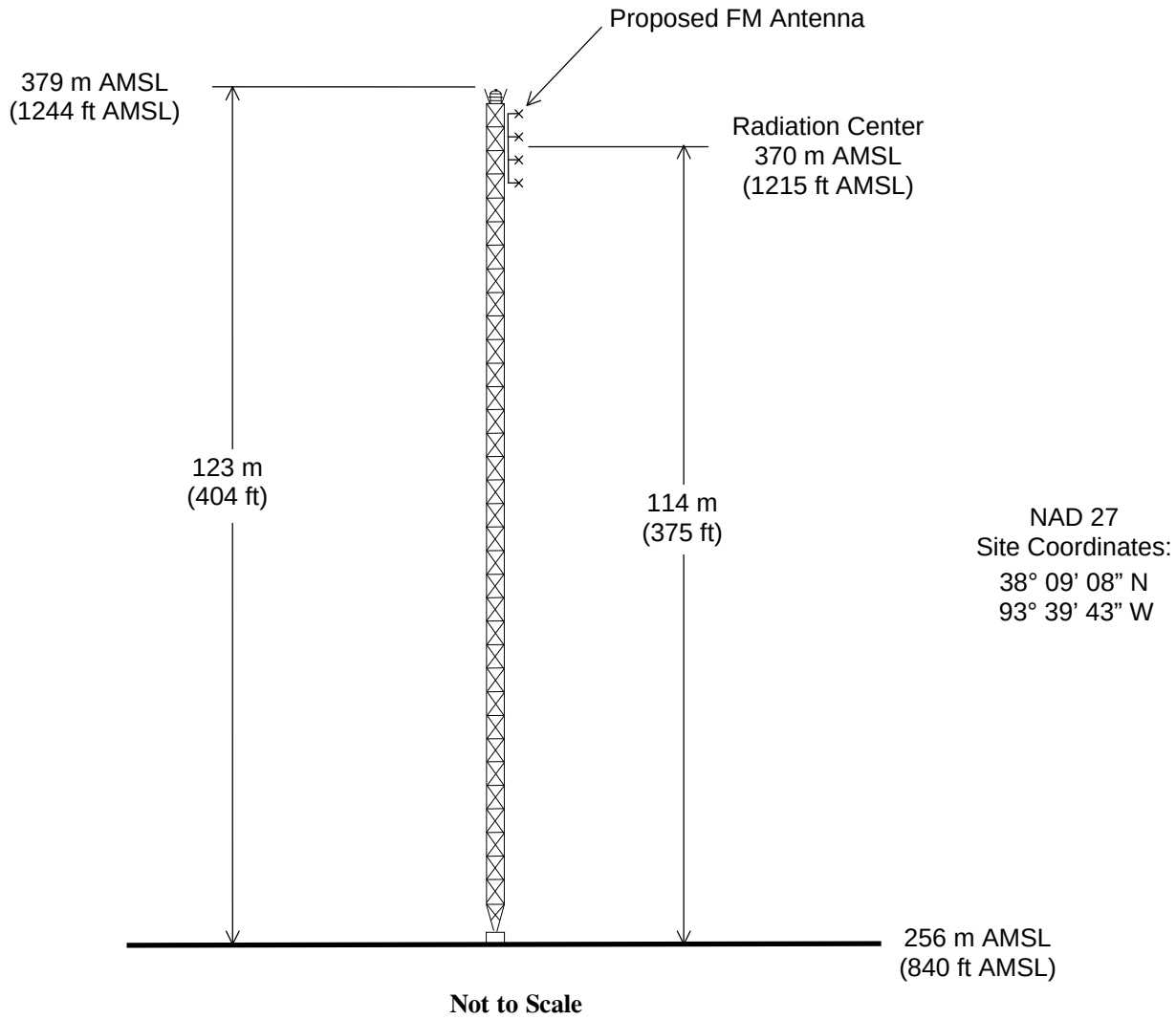
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

JULY 2009

(FAA being applied for)



Not to Scale

PROPOSED ANTENNA AND SUPPORTING STRUCTURE

NEW FM STATION

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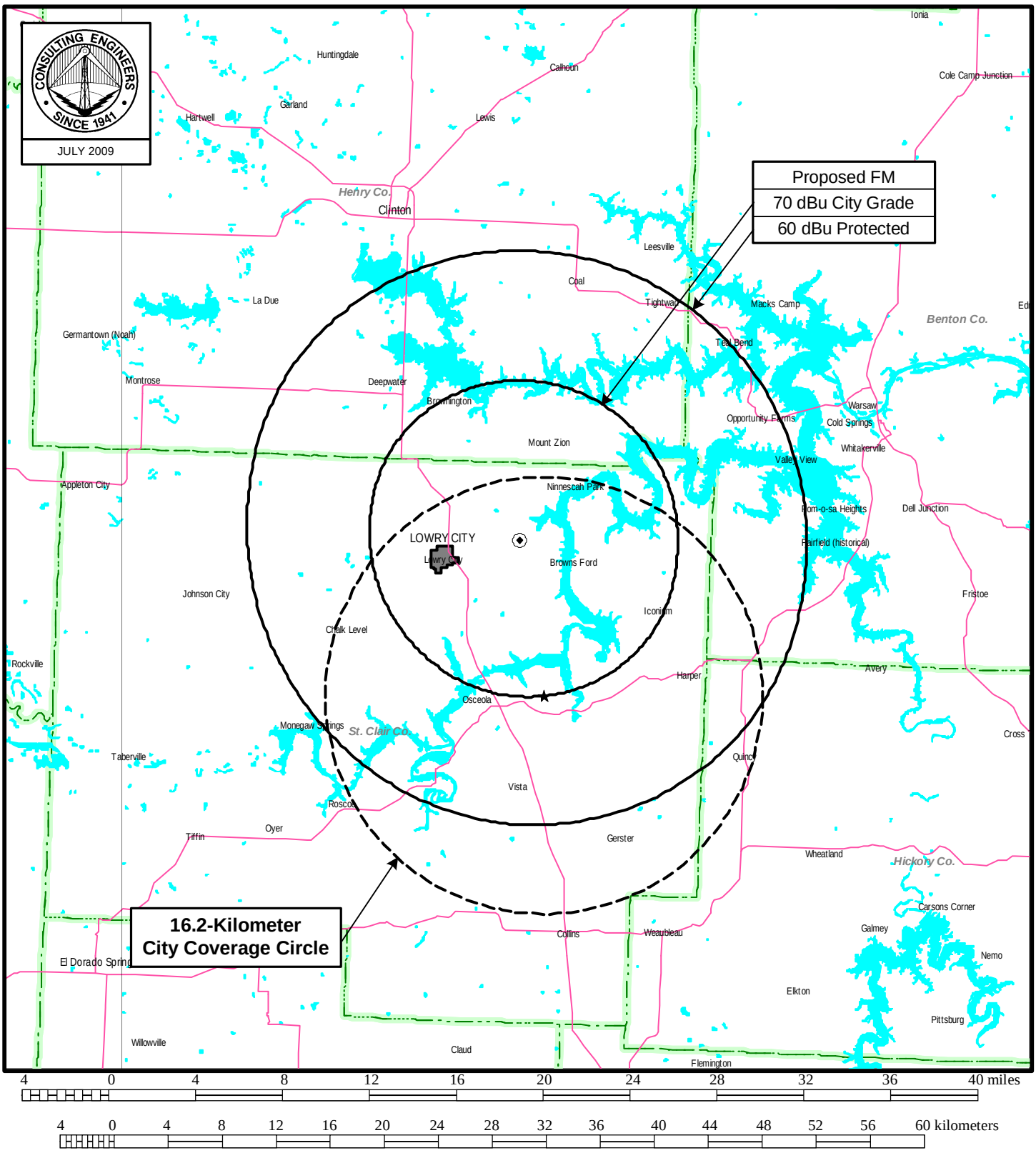
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3



PREDICTED COVERAGE CONTOURS

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LOWRY CITY, MO (ALLOTMENT REF POINT) FM SEPARATION STUDY

Channel: 285 **Coordinates:** 038-02-54 93-38-30 **Date:** 07/31/2009
Class: A **Buffer Distance:** 16 km

Callsign / Fac. ID	Status / ARN	Chan.	Serv.	Freq. / Class	City / DA / Ant. ID	ERP(kW)	State / HAAT(m)	Latitude / Longitude	Dist.(km) / Bear.(deg)	Sep.(km) / 73.215	Spacing(km) / Comment
KKLH	LIC	284	FM	104.7	MARSHFIELD		MO	037-12-21	113.87	106	7.87
24424	BMLH 20080229AAB			C2	N	34	181	092-54-20	145.09	**89 N**	**CLOSE**
KVCY	LIC	284	FM	104.7	FORT SCOTT		KS	037-52-43	96.9	89	7.9
73062	BLED 19970929KE			C3	N	16	125	094-43-24	259.08	**72 N**	**CLOSE**
KRES	LIC	284	FM	104.7	MOBERLY		MO	039-27-35	176.69	165	11.69
35890	BLH 19830124BA			C		100	311	092-42-07	27.15	**142 N**	**CLEAR**
NEW	CP	285	FM	104.9	LOWRY CITY		MO	038-02-54	0	115	
170999	BNPH 20070419AEP			A	N	6	100	093-38-30	141.78	**92 N**	
	Applicant's existing authorization										
	VAC	285	FA	104.9	LOWRY CITY		MO	038-02-24	0.93	115	
	RM 9845			A				093-38-28	176.99	**92**	
KCJK	LIC	286	FM	105.1	GARDEN CITY		MO	039-05-26	136.44	133	3.44
87565	BLH 20010620AAM			C1	N	69	349	094-28-18	328.35	**111 N**	**CLOSE**
KOSP	LIC	286	FM	105.1	WILLARD		MO	037-01-08	114.86	106	8.86
35427	BLH 19940602KB			C2	N	50	150	093-30-31	174.11	**89 N**	**CLOSE**
KESM-FM	LIC	288	FM	105.5	EL DORADO SPRINGS		MO	037-51-51	38.66	31	7.66
72447	BMLH 19921014KA			A	N	6	57	094-00-54	238.08	**25 N**	**CLOSE**

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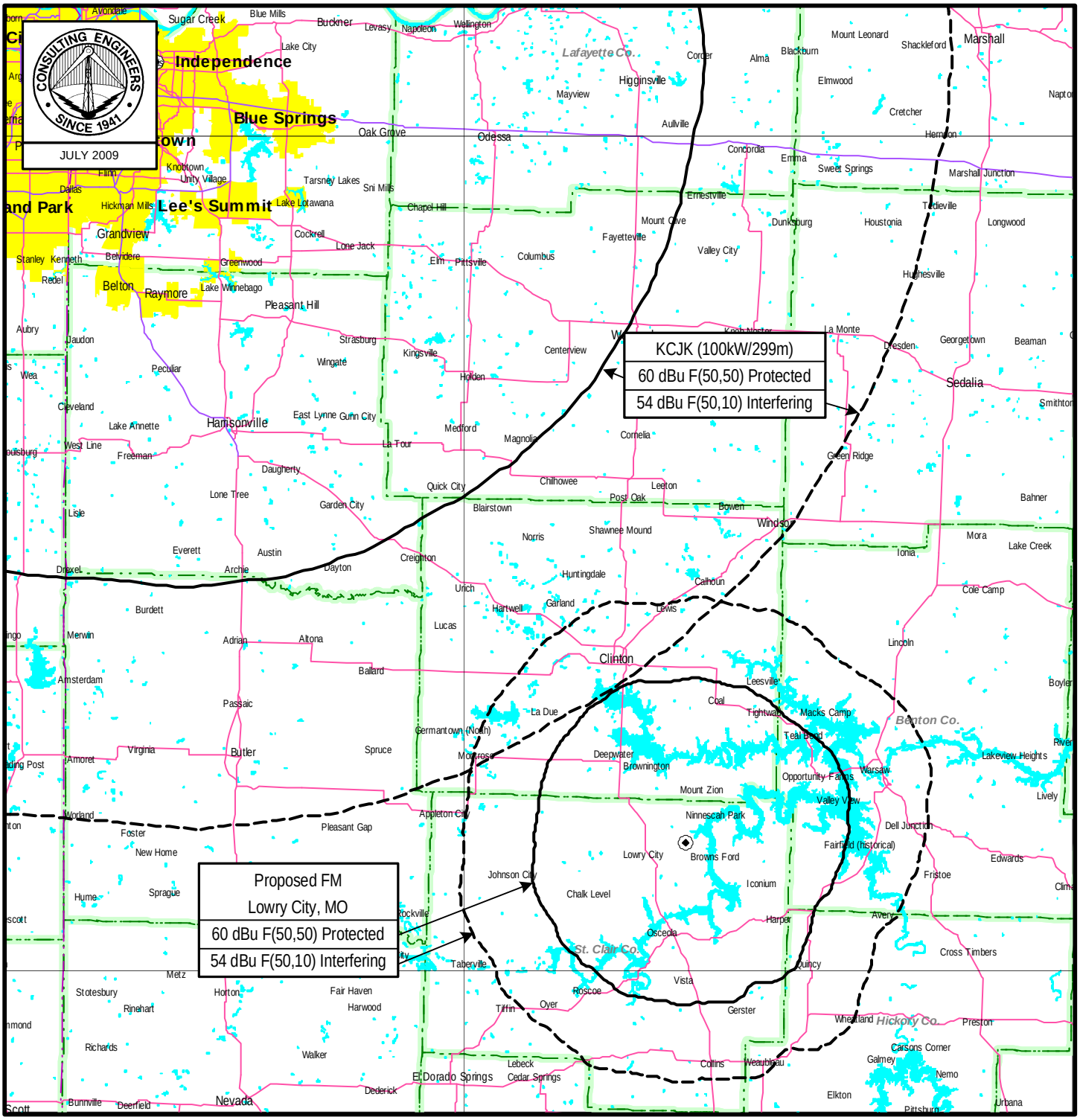
LOWRY CITY, MO (PROPOSED SITE) FM SEPARATION STUDY

Channel: 285 **Coordinates:** 038-09-08 93-39-43 **Date:** 07/31/2009
Class: A **Buffer Distance:** 16 km

Callsign / Fac. ID	Status / ARN	Chan.	Serv. / Class	Freq. / DA	City / Ant. ID	ERP(kW)	State / HAAT(m)	Latitude / Longitude	Dist.(km) / Bear.(deg)	Sep.(km) / 73.215	Spacing(km) / Comment
KRES	LIC	284	FM	104.7	MOBERLY		MO	039-27-35	167.39	165	2.39
35890	BLH 19830124BA		C			100	311	092-42-07	29.48	**142 N**	**CLOSE**
KVCY	LIC	284	FM	104.7	FORT SCOTT		KS	037-52-43	98.03	89	9.03
73062	BLED 19970929KE		C3	N		16	125	094-43-24	252.21	**72 N**	**CLOSE**
NEW	CP	285	FM	104.9	LOWRY CITY		MO	038-02-54	11.67	115	-103.33
170999	BNPH 20070419AEP		A	N		6	100	093-38-30	171.26	**92 N**	**SHORT**
	Applicant's existing authorization										
	VAC	285	FA	104.9	LOWRY CITY		MO	038-02-24	12.59	115	-102.41
	RM 9845		A					093-38-28	171.68	**92**	**SHORT**
KCJK	LIC	286	FM	105.1	GARDEN CITY		MO	039-05-26	125.79	133	-7.21
87565	BLH 20010620AAM		C1	N		69	349	094-28-18	326.26	**111 N**	**SHORT**
	Section 73.215 processing requested										
KESM-FM	LIC	288	FM	105.5	EL DORADO SPRINGS		MO	037-51-51	44.54	31	13.54
72447	BMLH 19921014KA		A	N		6	57	094-00-54	224.11	**25 N**	**CLEAR**



PREDICTED SITE ALLOCATION STUDY

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du Treil, Lundin & Rackley, Inc Sarasota, Florida