Educational Media Foundation **EXHIBIT 13**
K280GB, Pleasant View, CO August 2016

Proposed Minor Construction Permit Modification Application

The proposed construction permit modification specifies a new site with changes to the technical parameters as is indicated below:

	Construction Permit	CP Mod
Channel / Class	280 D	280 D
Geographical Coordinates	39 44 37 / 104 59 18	39 39 29 / 105 00 49
ASRN	1063701	1024664
Site AMSL	1594.0 m	1630.7 m
Tower AGL	249.9 m	62.5 m
COR AGL	246 m	55 m
COR AMSL	1840 m	1686 m
HAAT	201 m	7 m
ERP	0.085 kW (H&V, DA)	0.099 kW (H&V, DA)

The below listed pages of this exhibit contains information as indicated.

Page 2 Tabulation of HAAT / ERP / distance to 60 dBu contour
Page 3 CP & Proposed 60 dBu contour map
Page 4 - 5 Allocation study

Tabulation of HAAT / ERP / distance to 60 dBu contour

CH 280 39 39 29 / 105 00 49 0.099 kW ERP (DA) 1686 m COR AMSL 7 m HAAT

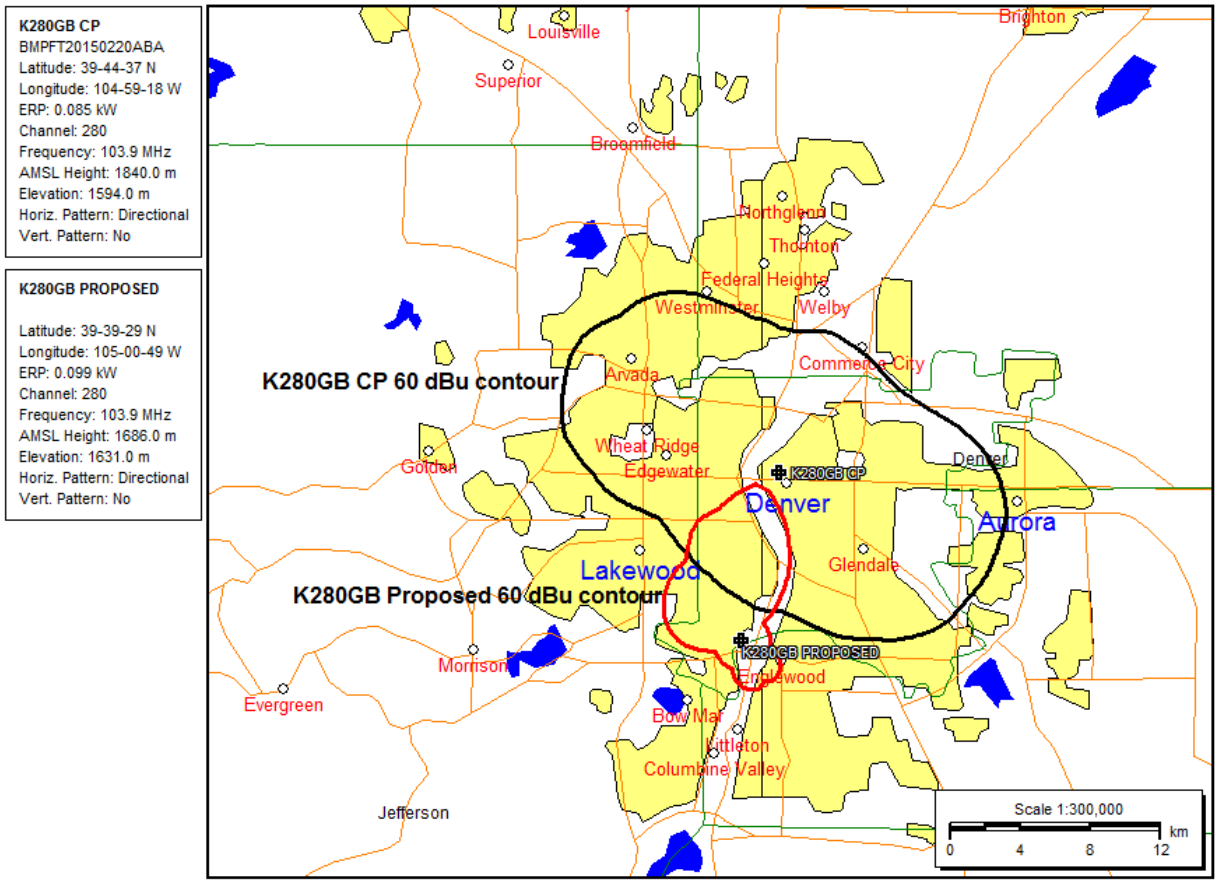
Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	1601.9	84.1	0.0680	-11.67	0.829	8.58
010	1586.2	99.8	0.0506	-12.96	0.715	8.70
020	1599.6	86.4	0.0322	-14.93	0.570	7.18
030	1614.0	72.0	0.0149	-18.27	0.388	5.45
040	1623.9	62.1	0.0035	-24.61	0.187	3.51
050	1633.8	52.2	0.0002	-36.98	0.045	1.61
060	1646.0	40.0	0.0001	-40.50	0.030	1.61
070	1662.0	24.0	0.0001	-39.94	0.032	1.61
080	1674.2	11.8	0.0001	-38.68	0.037	1.61
090	1679.3	6.7	0.0002	-36.79	0.046	1.61
100	1692.9	-6.9	0.0004	-33.79	0.065	1.61
110	1696.5	-10.5	0.0020	-27.00	0.142	2.16
120	1704.9	-18.9	0.0040	-23.94	0.202	2.55
130	1705.7	-19.7	0.0054	-22.66	0.234	2.73
140	1714.7	-28.7	0.0062	-22.08	0.250	2.82
150	1717.6	-31.6	0.0067	-21.74	0.260	2.87
160	1721.6	-35.6	0.0062	-22.08	0.250	2.82
170	1702.1	-16.1	0.0054	-22.66	0.234	2.73
180	1680.5	5.5	0.0040	-23.94	0.202	2.55
190	1660.0	26.0	0.0020	-27.00	0.142	2.16
200	1653.5	32.5	0.0004	-33.79	0.065	1.61
210	1678.6	7.4	0.0002	-36.79	0.046	1.61
220	1704.4	-18.4	0.0001	-38.68	0.037	1.61
230	1722.5	-36.5	0.0001	-39.94	0.032	1.61
240	1746.0	-60.0	0.0001	-40.50	0.030	1.61
250	1749.1	-63.1	0.0002	-36.98	0.045	1.61
260	1736.2	-50.2	0.0035	-24.61	0.187	2.46
270	1712.5	-26.5	0.0149	-18.27	0.388	3.47
280	1735.3	-49.3	0.0322	-14.93	0.570	4.21
290	1785.4	-99.4	0.0506	-12.96	0.715	4.72
300	1721.0	-35.0	0.0680	-11.67	0.829	5.11
310	1686.9	-0.9	0.0838	-10.77	0.920	5.39
320	1668.0	18.0	0.0949	-10.23	0.979	5.56
330	1649.7	36.3	0.0990	-10.04	1.000	6.13
340	1633.8	52.2	0.0949	-10.23	0.979	7.32
350	1625.6	60.4	0.0838	-10.77	0.920	7.64

FCC 30 second terrain database

(yellow highlighted values establish average HAAT)

CP & Proposed 60 dBu contours

The proposed 60 dBu contour will continue to have overlap with the CP 60 dBu contour.



Allocation Study

CH 280 39 39 29 / 105 00 49 0.099 kW ERP (DA) 1686 m COR AMSL 7 m HAAT

CH CALL / CITY	TYPE / STATE	AZI. <--	DIST / FILE #	LAT. / LNG.	Pwr(kW) / HAAT(M)	INT(km) / COR(M)	PRO(km) / LICENSEE	*IN* (Overlap in km)	*OUT* (Overlap in km)
Reference station:									
280D K280GB Pleasant View	CP CO	12.8 192.8	9.74 BMPFT20150220ABA	39 44 37.0 104 59 18.0	0.085	25.7 1840	7.6 Educational Media Foundation	-24.3	-25.6
1st, 2nd, & 3rd adjacent channel relationships:									
277D K277DB Silverthorne	LIC CO	263.5 82.8	95.24 BLFT20160425ACA	39 33 22.0 106 06 53.0	0.110	0.5 3550	20.2 Krystal Broadcasting, Inco	91.9	74.8
278C0 KRFX Denver	LIC CO	293.7 113.6	20.82 BLH20070927AIC	39 43 59.0 105 14 10.0	100.000 346	12.3 2256	84.8 Citicasters Licenses, Inc.	3.6	-64.5
280C2 KRXP Pueblo West	LIC CO	172.6 352.7	102.14 BLH20070326AGF	38 44 44.0 104 51 42.0	1.750 657	137.5 2912	59.8 Colorado Springs Radio Bro	-38.0	33.9
280D K280FZ Black Hawk	CP CO	285.0 104.7	47.06 BMPFT20150313AAB	39 45 59.0 105 32 39.0	0.024	44.1 2971	11.3 Clear Creek Radio, Inc.	-1.5	21.5
280C1 KRKA Severance	LIC CO	346.0 165.8	109.84 BMLED20130916AAT	40 37 03.0 105 19 40.0	16.500 372	150.3 2560	64.6 Educational Media Foundation	-48.0	20.2
280D K280FZ Black Hawk	LIC CO	285.0 104.7	47.06 BLFT20150506ADJ	39 45 59.0 105 32 39.0	0.024	45.6 2971	11.8 Clear Creek Radio, Inc.	-3.0	21.0
281C3 KBVC Buena Vista	LIC CO	225.6 44.8	143.99 BLH19961127KB	38 44 45.0 106 11 55.0	0.600 362	69.9 3335	46.9 Three Eagles Communication	72.5	95.5
282C1 KKFN Longmont	LIC CO	288.0 107.9	13.64 BLH19991214ABH	39 41 45.0 105 09 54.0	100.000 206	11.7 2081	80.8 Bonneville International C	-2.7	-67.7
I.F. relationships:									
None									

Terrain database is FCC 30 SEC
Contour distances are on direct line to and from reference station.

Allocation Study

K280GB will be located within the 60 dBu contour of the following second adjacent facilities:

KRFX (LIC), CH 278C0, Denver, CO

KRFX signal strength at the K280GB site	91.3 dBu
K280GB interference contour	131.3 dBu
Distance to K280GB interference contour	19.1 meters

KKFN (LIC), CH 282C1, Longmont, CO

KKFN signal strength at the K280GB site	97.4 dBu
K280GB interference contour	137.4 dBu
Distance to K280GB interference contour	9.4 meters

The K280GB proposed antenna COR AGL height is 55 meters. The 19.1 meter interference contour (worst case, KRFX) will not reach the ground or any population including any populated structures by a margin of 35.9 meters (see below map). Therefore, based on the showing of no population within the area of predicted interference, a waiver of Section 74.1204(d) is respectfully requested.

