

ENGINEERING STATEMENT

IN SUPPORT OF AN APPLICATION TO MODIFY THE LICENSED
TRANSMITTER FACILITY OF KEJC-FM @ MODESTO, CA

Modesto Communications Corp.

MARCH 8, 2004

W. Richard Green & Associates has been retained by Modesto Communications Corp. to prepare the engineering portion of an application to modify The transmitter facility of FM Station KEJC licensed to Modesto, Ca. That work has been completed and the results are contained within this engineering statement and the associated application, FCC-301.

PURPOSE OF APPLICATION

The purpose of the enclosed Application is only to correct the geographical coordinates of the "as constructed" FM transmitter antenna support structure (tower). No other changes are requested.

PROPOSED FACILITIES

The applicant is proposing to make no changes in the "as constructed" transmission facility. The FM directional antenna pattern will not be modified from the licensed pattern. The maximum Effective Radiated Power will be reduced from 4.0 KW to 3.95 KW.

The antenna system currently consists of a three bay Jampro model JMPC-3-RFR with half wavelength spaced elements. The antenna system is mounted near the top of the existing tower.

ALLOCATION CONDITIONS

As can be seen in the accompanying Engineering Exhibit E-4 the proposed FM facility meets the spacing requirements for all licensed and proposed facilities with the exception of first adjacent channel KPFA @ Berkeley, Ca and co-channel KZSL @ King City, Ca.

The application is necessarily being filed under 73.215 of the Commission's rules which allows for contour protection utilizing terrain factors and a directional antenna.

As is shown in engineering Exhibit E-2 & E-3, the proposed facility will neither cause interference to nor receive interference from KPFA.

As is shown in Exhibit E-2 and E-3, the proposed facility will neither cause interference to nor receive interference from KPFA. The interference study has been conducted with KPFA as a theoretical maximum transmitter facility of 50 KW @ 150 meters HAAT at the licensed coordinates.

ENVIRONMENTAL CONSIDERATIONS

There should not be any danger to personnel as a result of the proposed operation. The proposed facilities will meet all ANSI requirements as set forth in FCC OST-65 as well as the 1997 ANSI requirements for controlled areas.

With the exception of K49EO LPTV there are no other FM and TV facilities within six hundred meters of the antenna support structure.

The 115-dbu, FM BLANKETING CONTOUR, will extend to 0.78 Km and will cover only an unpopulated area.

There is a possibility of a Receiver Induced Third Order Intermodulation product being developed in existing receivers within the blanketing area of the proposed facility.

While no R.F.I. problems are expected to develop as a result of the construction and operation of the proposed transmitter facility, the applicant will assume the full responsibility to resolve all complaints and at no expense to anyone else.
Ref: FCC 73.318(b)(d)

The applicant has posted permanent metal signs at the base of the tower, the entrance to the transmitter building and at other places within the immediate area advising "NO TRESPASSING". This has been done in order to assure compliance regarding access by unauthorized personnel.

The applicant has a station policy which insures that: operations will cease, power reduced to a required level or maintenance time limited in accordance with the applicable standard should any maintenance in the area of the antenna be required. The applicant will agree to coordinate with any and all other users of the site at any time that work on the antenna supporting structure is required.

Utilizing table 1 found on page 37 of OST-65, as well as the formulas from which the table was derived, the total calculated power density at two meters above ground level will be less than 0.0061 mw/cm² out to a distance of 5,000 meters from the tower base in all directions.

This proposed facility compiles with DRAFT OET BULLETIN No. 65, Second Edition, "Evaluating Compliance With Fcc-Specified Guidelines for Human Exposure to Radio Frequency Radiation".

In addition, the proposed transmitter site is not located in any of the areas described in section 1.1307(A)(1) through (8) of the rules.

TOWER REGISTRATION

The tower FCC registration number is: 1035104

The tower is currently authorized by the FAA to be constructed to 128 meters AGL, 152.1 meters AMSL, however, the attached FAA 7460-1 has been filed in order to correct the geographical coordinates at the FAA.

CONCLUSION

It is the opinion of this engineer that the construction and operation of the FM transmitter facility, proposed herein, conforms fully with the intent and requirements of the Commission's Rules and Technical Standards.

Date: 03/8/04 by W. RICHARD GREEN
William Richard Green
for W. Richard Green & Associates
Cameron Park, California