

**Exhibit to KWMG Application
Minor Change
Anamosa, Iowa
Facility ID: 162475**

This exhibit presents the technical details of a "One-Step" class upgrade of KWMG from Class A to Class C3, with a change in antenna location. No change in principal community or channel is proposed.

Concurrent with this upgrade request, a Petition for Rule Making to change the channel of the vacant allotment for Asbury, Iowa is being filed. This instant application is "contingent" upon that change of channel from 238 to 254. Consequently, this application is part of a "hybrid" proposal together with the concurrent Petition for Rule Making.¹

We have determined that a supplemental method of depicting city grade coverage, as provided in §73.313(e) of the Commission's rules, is appropriate and is part of this application.

Assignment Location

A compliant assignment location² has been identified meeting the requirements of spacing and community coverage, and thought to be compliant with other Commission policies and procedures.

Spacing Compliance

Figure 1 is a spacing study from the proposed assignment location. Other than the present KWMG facilities, the study indicates short spacing exists to the above referenced vacant allotment at Asbury, Iowa. The proposed change of the Asbury allotment to channel 254 will remove this short spacing. The study also indicates a short spacing to an application and hybrid rulemaking for KQMG-FM, both of which have been

¹ See *Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, Report and Order, 21 FCC Rcd 14212 (2006).

² 40° 00' 19.5" N 91° 14' 52.5" W.

dismissed by Commission action.³ Thus the assignment location complies with Section 73.207.

Principal Community Signal

Figure 2 is a map of a 70 dBu contour and the civic boundary of the KWMG principal community of Anamosa, Iowa, demonstrating compliance with Section 73.315 of the Commission's rules.

Antenna Location

The proposed antenna location is upon an element in the array of co-owned standard band station WMT. The licensee is aware and prepared to take steps to assure proper operation of WMT. The directional antenna for KWMG is to be mounted 111 meters above ground on the tower identified by antenna structure registration number 1024392. The FCC web tool has been used to determine an equivalent power of 18.0 kW to be allowed from this location and resultant height above average terrain⁴ of 118 meters.

Spacing Compliance

Attached as Figure 3 is a spacing study from the proposed antenna location. Other than the present KWMG facilities, the study indicates short spacing exists to the above-referenced vacant allotment at Asbury, Iowa. The proposed change of the Ashbury allotment to channel 254 will remove this short spacing. The study also indicates a short spacing to an application and hybrid rulemaking for KQMG-FM, both of which have been dismissed by Commission action.⁵ Thus the proposed antenna location complies with Section 73.207 of the Commission's rules. Also indicated in the study is short spacing to KZAT-FM and WRQT(FM), to which spacing in accordance with Section 73.215 of the Commission's rules is requested.

Section 73.215 Compliance

With respect to KZAT-FM, it is proposed to utilize a directional antenna with the emission pattern shown in

³ Letter dated November 30, 2011 to KM Radio of Independence, LLC as part of BPH-20070119AEI, and DA 12-512, dated April 2, 2012.

⁴ As determined by the FCC tool "Antenna Height Above Average Terrain (HAAT) Calculator".

⁵ *Ibid.*

Figure 4 to limit emission in the direction toward KZAT-FM, in order to prevent prohibited contour overlap.

With respect to WQRT(FM), no prohibited contour overlap with WQRT(FM) is predicted.

Figure 5 is a contour overlap study from the proposed antenna location utilizing the antenna emission pattern given in Figure 4. This contour overlap study utilized the techniques of the microcomputer program "FM Over" to calculate contour clearances or overlaps. The results of the study indicate no prohibited contour overlap with KZAT-FM or WQRT.

The prior-referenced dismissed application/allotment and the allotment subject to the concurrent channel change petition for rule making⁶ are still reflected in this report.

Maps illustrating the contour relationship with KZAT-FM and WQRT(FM) are attached as Figures 6 and 7 respectively.

Supplemental Community Coverage

The proposed KWMG city grade contour (3.16 mV/m, 70 dBu) does not completely encompass the city of Anamosa, Iowa when utilizing the standard FCC method of calculating the contour.⁷ We have determined that a supplemental method of depicting city grade coverage, as provided in §73.313(e) of the Commission's rules, is appropriate. As shown below, the supplementary determined distance to contour exceeds that predicted by the standard method by more than 30%.

The city of Anamosa, Iowa falls in an arc between 72° and 81° from the proposed KWMG transmitter site. Analyzing individual radials from the proposed KWMG site toward the community, we have determined the location of the city grade 70 dBu (3.16 mV/m) contour based on the standard utilization of the Commission's F(50/50) curves.

We have alternatively determined the location of the city grade 70 dBu (3.16 mV/m) signal using the Longley-Rice coverage model, based on NBS Technical Note #101 methodology as implemented in the V-Soft microcomputer program "Probe 4".

⁶ *Ibid.*

⁷ §73.313(c) and §73.333.

In this instant proposal this alternative method provides a more representative prediction of field strength than the standard methodology. A summary of the data and a tabulation of the results of this report, at one degree intervals, is attached.

The distances in the direction of concern depicted by Longley-Rice are in excess of 30% higher than the distances predicted using the Commission's standard methodology.⁸ Based on the Commission and staff policy,⁹ we find that the predicted distance of the contour on these pertinent radials varies widely from the standard methodology, therefore, pursuant to §73.313(e), a supplemental method of depicting city grade coverage is acceptable.

Using this supplemental method, as visually demonstrated in Figure 8 and documented in the tabulation of Figure 9, we find that the city grade contour, in the direction of Anamosa, Iowa,¹⁰ extends well beyond the city boundary. Therefore, based on the supplemental showing, we find that the principal community is completely encompassed by the city grade contour of the proposed KWMG facility, in compliance with §73.315 of the Commission's rules.

Radio Frequency Radiation Study and Statement

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

The proposed antenna system is an ERI MPX 4 bay full wave spaced array which has been evaluated using the program "FM Model" as EPA type 3, "Rototiller " antenna, mounted with its center of radiation 111 meters above ground level, and operated with an effective radiated power of 18 kilowatts in both the horizontal and vertical planes. At 2 meters above

⁸ On average, 65% further utilizing the supplemental methodology.

⁹ See *Amendments of Parts 73 and 74 of the Commission's Rules to Permit Certain Minor Changes in Broadcast Facilities Without a Construction Permit, Report and Order*, 12 FCC Rcd 12371, 12401-03 (1997); *Skytower Communications - 94.3, LLC*, 25 FCC Rcd 13204 (Chief, Audio Div., Med. Bur. 2010).

¹⁰ On a bearing of 72° to 81° True from the antenna site.

ground, at 45 meters from the base of the tower, this proposal will contribute worst case, 8.8 microwatts per square centimeter, or 0.88 percent of the allowable ANSI limit for controlled exposure, and 4.4 percent of the allowable limit for uncontrolled exposure. This figure is less than 5% of the applicable FCC exposure limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be less than 5% of the applicable exposure limit. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

Reallocate Vacant *238A at Asbury, IA to *254A

To allow this proposed upgrade it is necessary to reallocate the vacant Channel *238A allotment at Asbury, Iowa to Channel *254A. This channel substitution matches exactly the proposal channel change of the Asbury allotment that was part of a recently terminated rulemaking proceeding.¹¹

Allocation Location

The proposed new allocation reference coordinates for Channel *254A at Asbury, Iowa are:

42° 29' 23" North Latitude

90° 46' 56" West Longitude

¹¹ *Report and Order*, DA 12-512, MB Docket No. 08-150, RM-11390 (Ass't Chief, Audio. Div., Med. Bur. Rel. April 2, 2012). The proposed channel change for the Asbury, Iowa allotment was terminated because the corresponding hybrid application had been dismissed. See *id.* at ¶ 3.

This is a slight site change of the current reference allocation coordinates for Asbury. This is the same location proposed in MB Docket No. 08-150.

Spacing Compliance

With the exception of the terminated petition, the spacing study attached as Figure 10 demonstrates the proposed location is fully spaced for the proposed channel and class.

Principal Community Signal

Coverage over the community of Asbury is predicted from this allocation location as demonstrated in Figure 11.

Figures and Attachments

Figure 2 - Map of Assignment Community Coverage

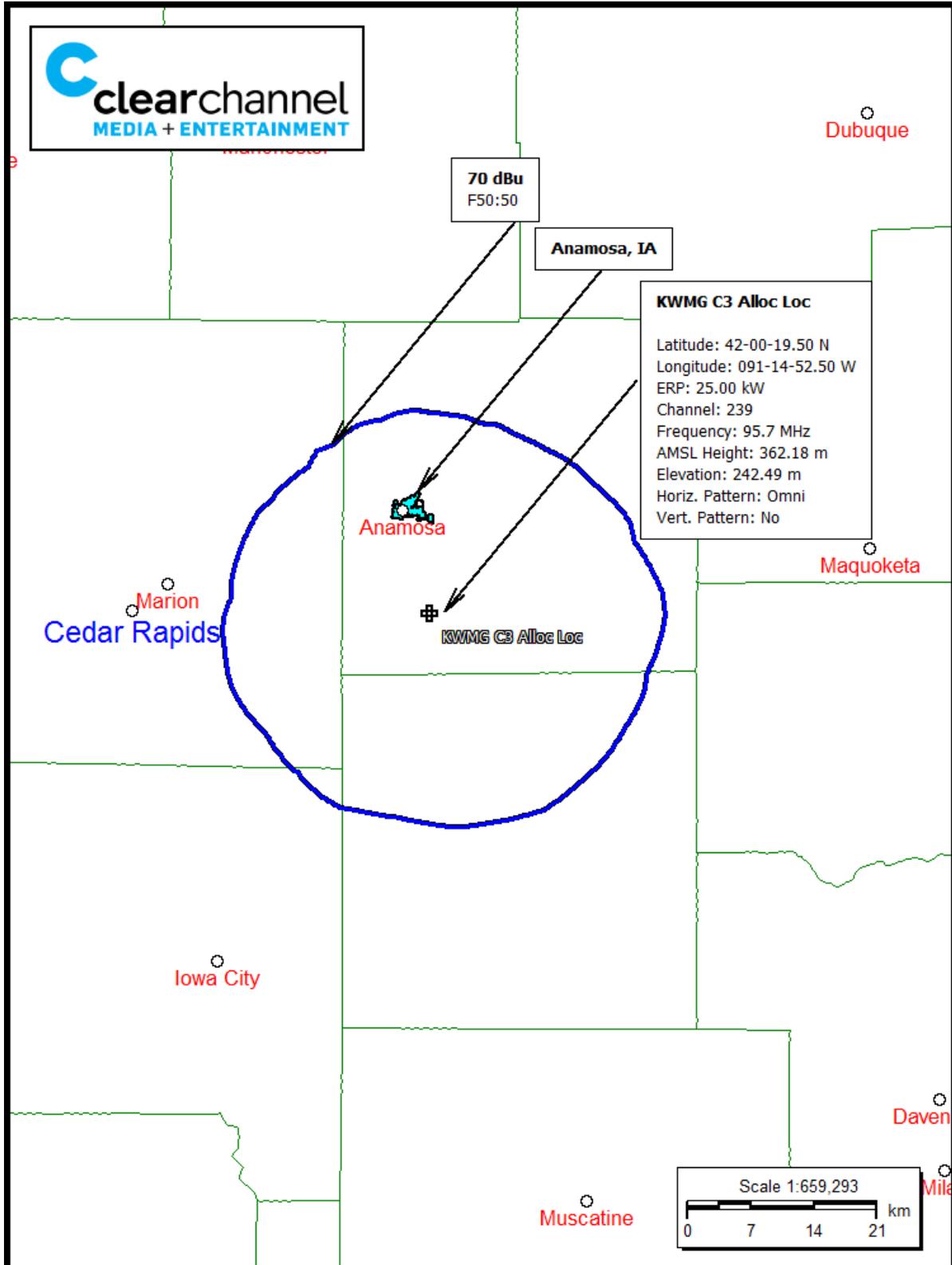


Figure 4 - Proposed Antenna Pattern

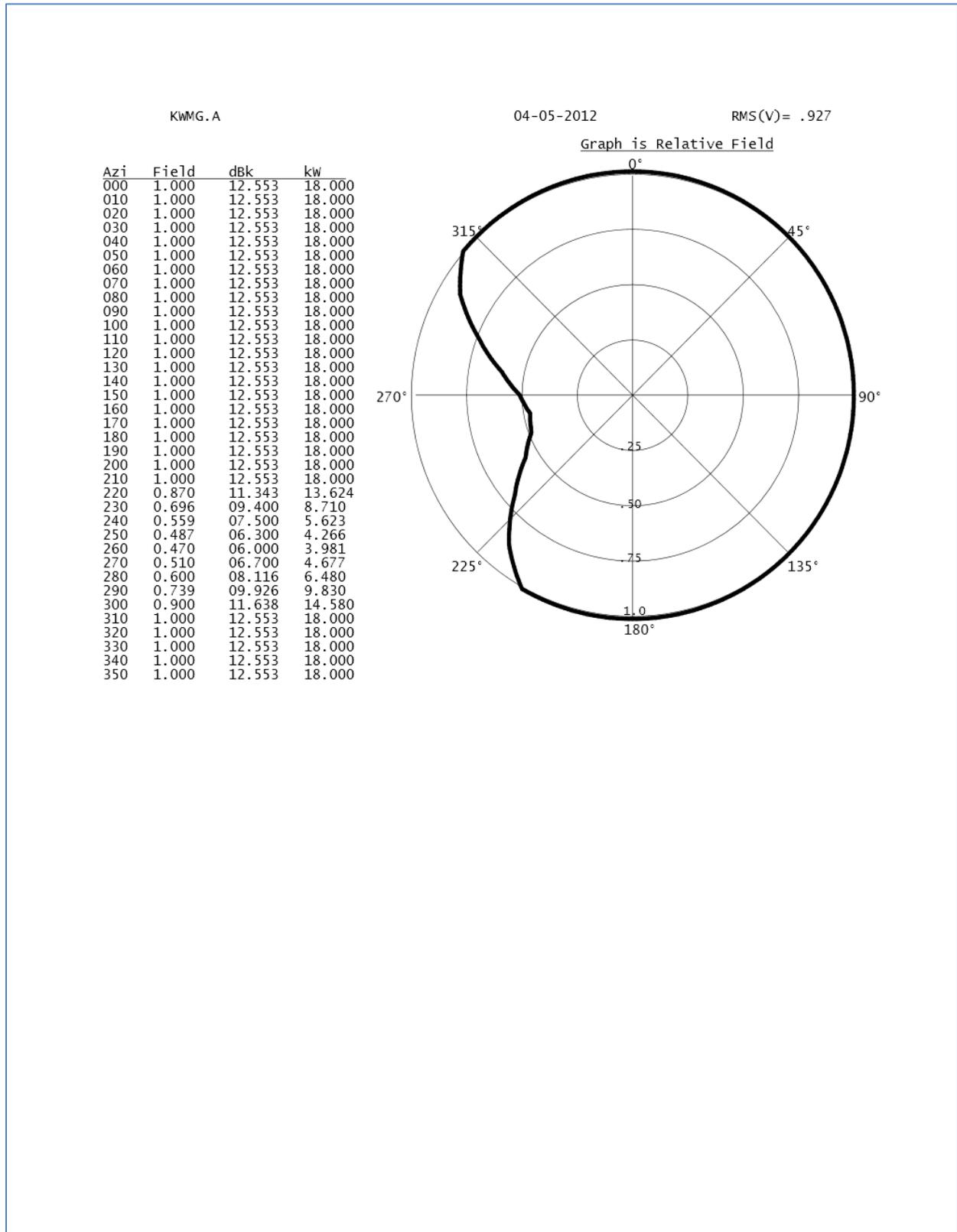


Figure 5 - Antenna Location Overlap Study

KwMG at Antenna Location Overlap Study Rev 1

REFERENCE	CH#	239C3 - 95.7 MHZ, Pwr= 18 kw DA, HAAT= 132.6 M, COR= 373 M						DISPLAY DATES			
42 03 39.0 N.		Average Protected F(50-50)= 40.93 km						DATA 04-03-12			
91 32 35.4 W.		Standard Directional						SEARCH 04-05-12			
CH CITY	CALL	TYPE ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*	
239A	KWMG	APP _CX IA	93.2 273.2	10.06 BPH20111209DSS	42 03 20.9 91 25 18.4	6.000 91	87.8 356	29.2 Citicasters Licenses, Inc.	-115.7*	-126.9*	
239A	KWMG	LIC _CX IA	74.5 254.6	15.90 BLH20080213AAO	42 05 56.0 91 21 28.4	6.000 100	87.4 367	28.9 Citicasters Licenses, Inc.	-108.9*	-120.2*	
236A	KQMG-FM	RSV-A IA	192.7 12.7	21.32	41 52 25.0 91 36 00.0	6.000 100	2.8 338	28.6 Km Radio Of Independence,	36.0R	-14.7M	
One Step Application											
236A	R11701	ADD IA	192.7 12.7	21.32	41 52 25.0 91 36 00.0	6.000 100	2.8 338	28.6 Km Radio Of Independence	36.0R	-14.7M	
Proposed community and channel for KQMG-FM											
236A	KQMG-FM	APP _CX IA	192.7 12.7	21.32 BPH20070119AEI	41 52 25.0 91 36 00.0	6.000 61	2.3 300	23.0 Km Radio Of Independence,	36.0R	-14.7M	
One Step Application											
239C2	WRQT	LIC _CX WI	6.8 187.0	175.86 BMLH20080111ADD	43 37 57.0 91 17 06.0	50.000 150	138.5 417	52.9 Family Radio, Inc.	0.0<	15.7	
238A	KZAT-FM	LIC _CN IA	259.8 79.2	71.98 BLH19970605KA	41 56 35.0 92 23 51.0	4.400 117	41.9 382	27.3 Grupo Roble, LLC	72.0R	-0.02M	
Downgrade From Channel 238C3											
238A	AL2639	VAC _N IA	54.9 235.5	86.65 RM8924	42 30 18.0 90 40 46.0	6.000 100	34.7 346	23.0 Indianapolis Motor Speedwa	14.6	6.4	
Asbury 10/19/2004: per MB 04-91 reserved for noncommercial educ. use.											
238A	R11701	DEL IA	54.9 235.5	86.65	42 30 18.0 90 40 46.0	6.000 100	34.7 346	23.0 Km Radio Of Independence	14.6	6.4	
Proposed channel substitution of vacant allotment											
237A	KQMG-FM<	LIC _CN IA	329.6 149.3	53.54 BLH19950605KB	42 28 32.0 91 52 26.0	2.900 125	2.6 418	28.4 Km Radio Of Independence,	42.0R	11.5M	
237A	R11701<	DEL IA	329.6 149.3	53.54	42 28 32.0 91 52 26.0	6.000 100	3.0 394	31.0 Km Radio Of Independence	42.0R	11.5M	
Proposed change of community and change of channel for KQMG-FM											
237A	R11701<	DEL IA	329.5 149.3	53.65	42 28 34.0 91 52 31.0	6.000 100	3.0 394	31.1 Km Radio Of Independence	42.0R	11.7M	
Proposed deletion of allotment											
241C1	KMXG<	LIC _CN IA	116.5 297.3	105.39 BLH19861017KB	41 37 58.0 90 24 38.0	100.000 299	9.7 502	70.3 Citicasters Licenses, Inc.	76.0R	29.4M	
236A	KMAQ-FM<	LIC _C_ IA	87.2 267.8	75.75 BLH19990316KC	42 05 26.0 90 37 43.0	6.000 100	2.9 335	30.2 Maquoketa Broadcasting Com	42.0R	33.8M	
237A	R11715<	ADD IA	87.2 267.8	75.75	42 05 26.0 90 37 43.0	6.000 100	2.9 329	29.5 Km Radio Of Independence,	42.0R	33.8M	
Maquoketa involuntary channel substitution in BPH-20070119AEI - from Channel 236											
237A	R11701<	ADD IA	87.2 267.8	75.75	42 05 26.0 90 37 43.0	6.000 100	2.9 329	29.5 Km Radio Of Independence	42.0R	33.8M	
Maquoketa Proposed substitute channel											
236A	R11715<	DEL IA	87.2 267.8	75.75	42 05 26.0 90 37 43.0	6.000 100	2.9 329	29.5 Km Radio Of Independence,	42.0R	33.8M	
Maquoketa involuntary channel substitution in BPH-20070119AEI - to Channel 237											
236A	R11701<	DEL IA	87.2 267.8	75.75	42 05 26.0 90 37 43.0	6.000 100	2.9 329	29.5 Km Radio Of Independence	42.0R	33.8M	
Maquoketa Proposed channel substitution											
239A	WSEY<	LIC _CN IL	88.9 270.3	175.82 BLH19990809KB	42 04 19.0 89 25 08.0	3.200 109	73.7 355	22.5 Nrg License Sub, Llc	142.0R	33.8M	
239C3	KQWC-FM<	LIC _CN IA	284.5 103.0	191.35 BLH19910522KA	42 28 04.0 93 47 48.0	25.000 100	111.9 450	37.4 Nrg License Sub, Llc	153.0R	38.4M	
webster City											
240A	KCOB-FM<	LIC _CN IA	254.1 73.1	127.74 BLH19930628KF	41 44 11.0 93 01 12.0	5.100 108	43.1 385	28.0 Newton License Co, Llc	89.0R	38.7M	
Newton											

Figure 6 - Contour Map to KZAT-FM

KWMG and KZAT-FM Contours
KWMG at Tower Antenna Overlap Study Rev 1

FMCommander Single Allocation Study - 04-05-2012 - NGDC 30 SEC
KWMG.A's Overlaps (In= 1.55 km, Out= 1.05 km)

KWMG.A CH 239 C3 DA
Lat= 42 03 39.0, Lng= 91 32 35.4
18.0 kW 132.6 M HAAT, 373 M COR
Prot.= 60 dBu, Intef.= 54 dBu

KZAT-FM CH 238 A BLH19970605KA
Lat= 41 56 35.0, Lng= 92 23 51.0
4.4 kW 117 M HAAT, 382 M COR
Prot.= 60 dBu, Intef.= 54 dBu

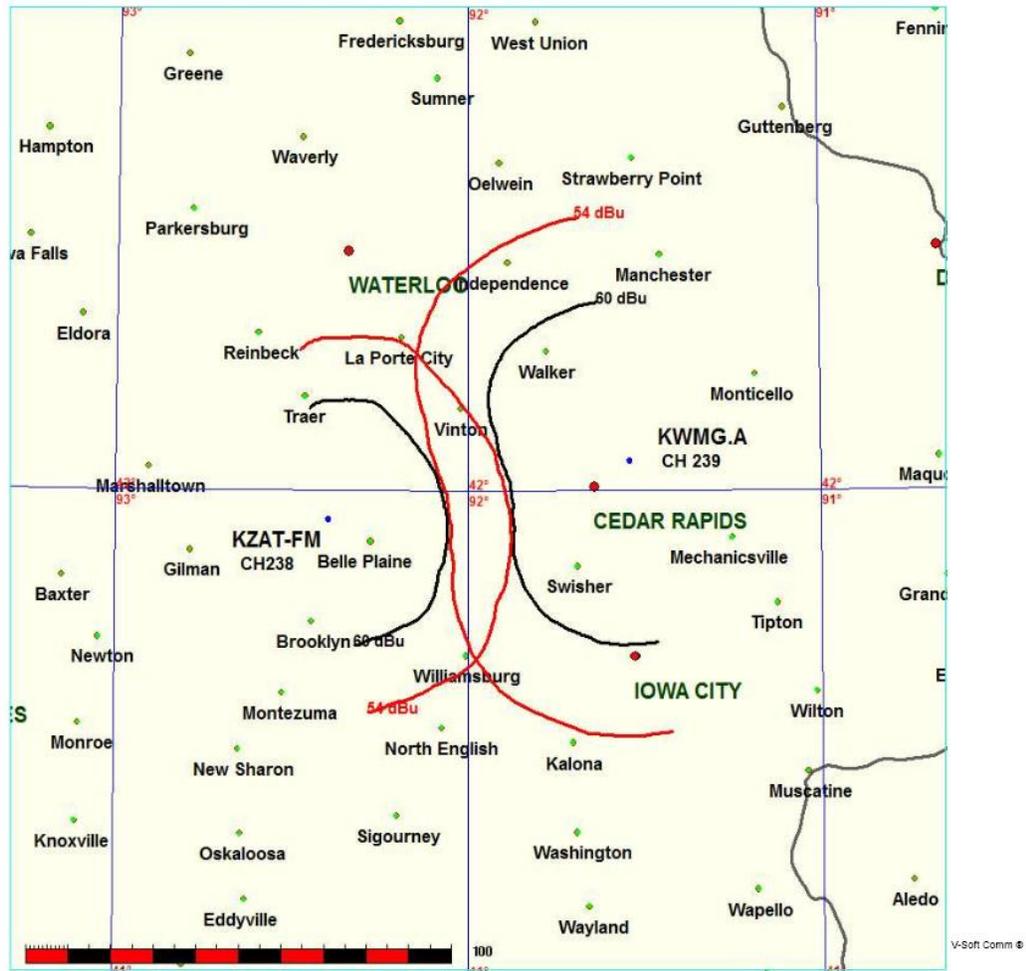


Figure 7 - Contour Map to WRQT

KWMG and WRQT Contours
KWMG at Tower Antenna Overlap Study Rev 1

FMCommander Single Allocation Study - 04-05-2012 - NGDC 30 SEC
KWMG.A's Overlaps (In= 0.0 km, Out= 15.75 km)

KWMG.A CH 239 C3 DA
Lat= 42 03 39.0, Lng= 91 32 35.4
18.0 kW 132.6 M HAAT, 373 M COR
Prot.= 60 dBu, Intef.= 40 dBu

WRQT CH 239 C2 BMLH20080111ADD
Lat= 43 37 57.0, Lng= 91 17 06.0
50.0 kW 150 M HAAT, 417 M COR
Prot.= 60 dBu, Intef.= 40 dBu

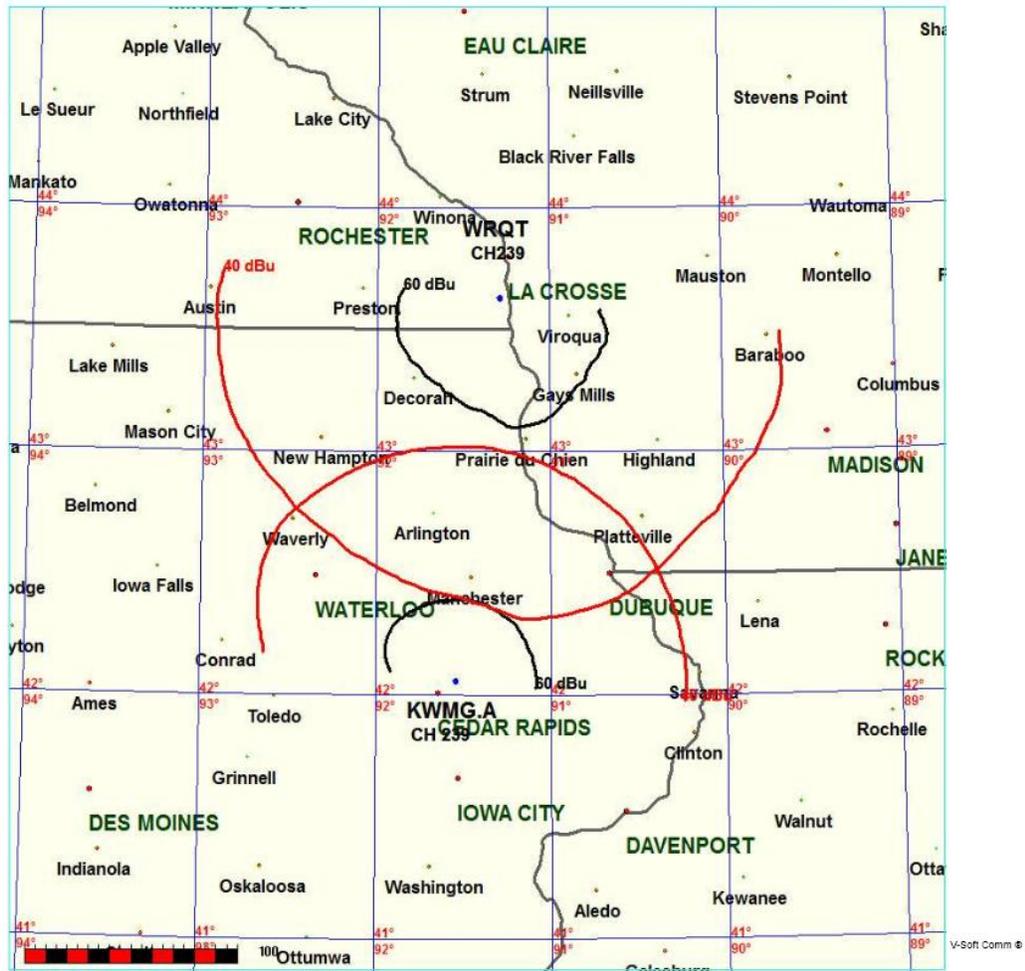


Figure 8 - KWMG Supplemental Contour Map

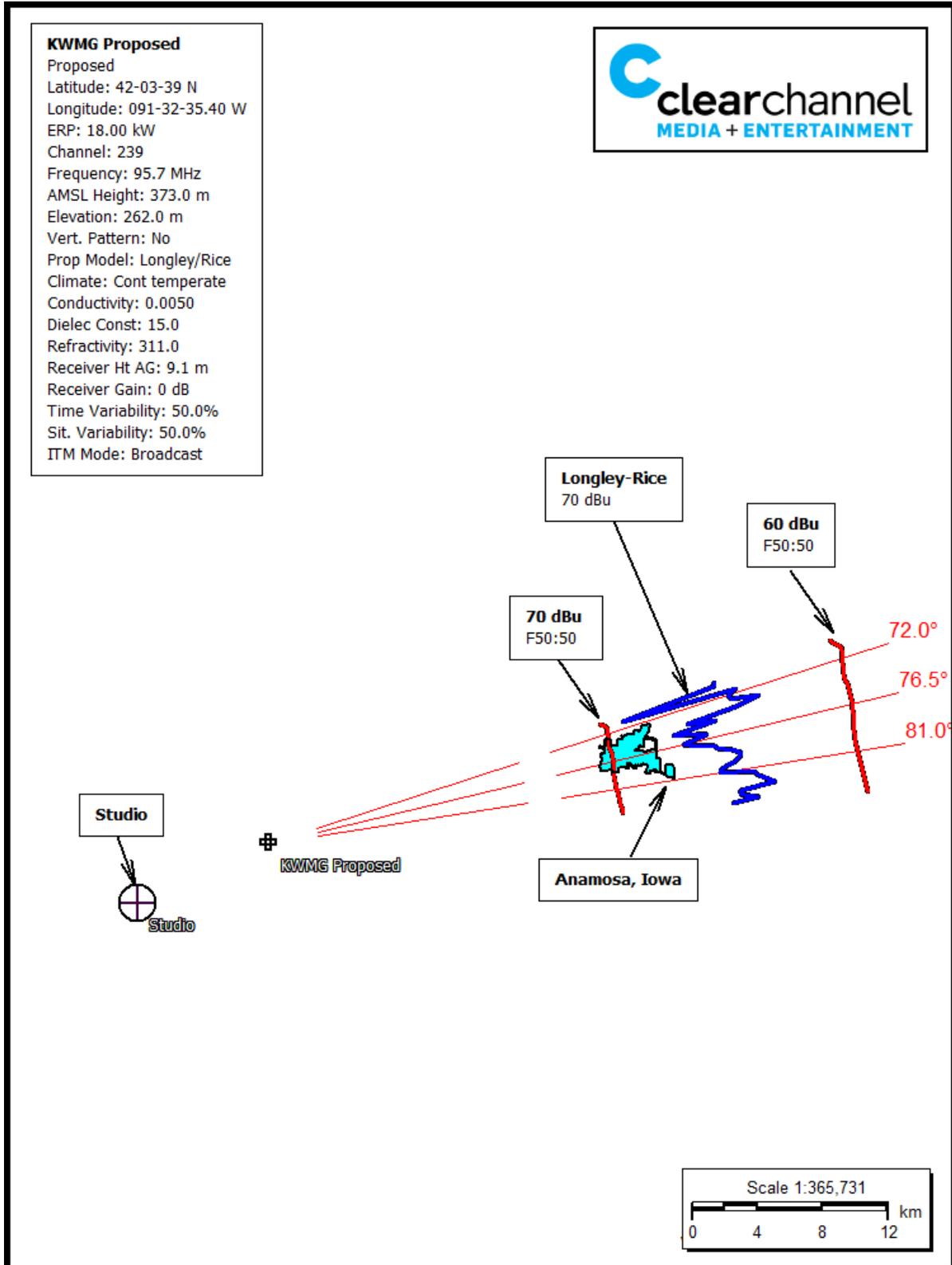


Figure 9 - KWMG Tabulation of Contour Distances

KWMG Tabulation of Contour Distances, and differences between distances as predicted by the FCC Standard and Alternate (Longley-Rice) Methodologies					
Radial		60 dbu FCC Method	70 dbu FCC Method	70 dbu Longley-Rice Method ¹²	
<i>Bearing</i>	<i>HAAT</i>	<i>Distance, km</i>	<i>Distance, km</i>	<i>Distance, km</i>	<i>Change %</i>
72	101.2	36.7	21.7	36.7	69%
73	100.5	36.6	21.6	36.6	69%
74	99.8	36.4	21.5	33.1	54%
75	100.4	36.6	21.6	34.1	58%
76	100.3	36.5	21.6	34.9	62%
77	99.9	36.5	21.5	35.1	63%
78	99.4	36.4	21.5	36.4	70%
79	98.7	36.3	21.4	36.3	70%
80	98.6	36.3	21.4	36.0	68%
81	98.8	36.3	21.4	34.3	60%
				Average of Change	65%

¹² Truncated at 60 dBu F50:50

Figure 11 - Map of Allotment Community Coverage

