

2121 Eisenhower Avenue, Suite 200
Alexandria, Virginia 22314
(703) 299-9222

ENGINEERING REPORT

Willow Creek, CA, FM Minor Modification for New Station--Amendment

EXHIBIT 26 AMENDED –ENGINEERING STATEMENT REGARDING SECTION 73.207

In response to an FCC deficiency letter dated July 31, 2008 (attached), this application is being further amended to add an involuntary "Show Cause" Order of KPOD-FM for displacement to channel 259C2 (from channel 250C2)¹.

Therefore, this proposal (as further amended) is part of the following set of contingent applications and involuntary changes:

Willow Creek, CA, 253A to Willow Creek, CA, 254C3
(Minor modification of new station awarded in FM Auction 70; *This application*)

Ferndale, CA, 256C1 to Ferndale, CA, 249C1
(Involuntary "Show Cause" Order for KJNY)

Crescent City, CA, 250C2 to Crescent City, CA, 259C2
(Involuntary "Show Cause" Order for KPOD-FM)

Table 1, attached, is a channel 254C3 separation study (from April 4, 2007) that demonstrates compliance with Section 73.207. (Any short-spacing that is to be removed by a contingent minor modification is fully protected upon grant of the contingency.)

Table 2, attached, is a channel 249C1 separation study (from April 4, 2007) that demonstrates compliance with Section 73.207 for KJNY, Ferndale, CA. (The KPOD-FM channel 250C2 reserved assignment was not in CDBS until recently and is not shown in Table 2. See footnote 1.) The Applicant respectfully asks the Commission to

¹ The FCC letter cites channel 250C2 as a reserved assignment for KPOD-FM, Crescent City, CA (dating back to MM Docket No. 93-31, Report and Order, released July 30, 1993); and indicates that the proposed involuntary “Show Cause” Order of KJNY to channel 249C1 is short-spaced to the KPOD-FM channel 250C2 reserved assignment. Although KPOD-FM is apparently only licensed for channel 250A (having failed to modify its facilities within 90 days of the Report and Order as required by the FCC) and until recently was not identified as having a reserved assignment for channel 250C2 in CDBS, this amendment to involuntarily “Show Cause” KPOD-FM to channel 259C2 corrects the application’s apparent deficiency.

DELAWDER COMMUNICATIONS, INC.

2121 Eisenhower Avenue, Suite 200

Alexandria, Virginia 22314

(703) 299-9222

ENGINEERING REPORT

Willow Creek, CA, FM Minor Modification for New Station--Amendment

issue an order to Show Cause why KJNY should not be ordered onto channel 249C1. (KJNY is the first of two involuntary changes required of this set of contingent applications.)

Table 3 (added by this amendment), attached, is a channel 259C2 separation study that demonstrates compliance with Section 73.207 for KPOD-FM, Crescent City, CA. (The channel 250C2 reserved assignment reference coordinates are used as the study reference coordinates, and can also be used as the reference coordinates for the proposed channel 259C2 facility.) The Applicant respectfully asks the Commission to issue an order to Show Cause why KPOD-FM should not be ordered onto channel 259C2. (KPOD-FM is the second of two involuntary changes required of this set of contingent applications.)

It should be noted that KPOD-FM can continue to operate with its licensed class A facility from its licensed transmitter site on the new channel 259 (in conformance with the Section 73.207 separation requirements) if it so desires. (Of course, should KPOD-FM indicate that it is no longer interested in the class C2 reserved assignment and wishes to remain as a class A licensed facility, it can do so without the channel change and remain on channel 250A.) Furthermore, various other channels (260, 264 and 283) appear to also be available to KPOD-FM as an alternative for the class C2 assignment.

Delawder Communications, Inc.
Alexandria, VA

TABLE 1, Page 1 of 1
Wednesday, April 04, 2007

BIAfn/Dataworld FM Spacing Study

Title: Willow Creek 254C3

Channel: 254 C3 (98.7 MHz)

Database: FCC 4/4/2007 12:00:00 AM

Latitude: N 40° 52' 28.0"
Longitude: W 123° 43' 52.0"
Safety Zone: 45.0 km

Call	Auth	Licensee name	Chan	HAAT(m)	ERP	Latitude	Br-to	Dist	Req
City of License		St	FCC File Number	Freq	HAMSL(m)	Longitude	-from	(km)	(km)
KMUE	APP	REDWOOD COMMUNITY RADIO, INC	*201 C1	494.0		N 40° 43' 39.0"	231.1	26.03	24.00
EUREKA		CA	BPED-20070403ABK	88.1	882.0	15 V W 123° 58' 17.0"	51.0	2.028	CLOSE
DA: ODD FORM 340 @ 0.0°									
KVIP-FM	USE	PACIFIC CASCADE COMMUNICATIONS C	251 C			N 40° 39' 18.0"	103.1	104.9	96.00
REDDING		CA		98.1		W 122° 31' 21.0"	283.9	8.919	CLOSE
Coordinates updated from LIC record BLH840518D									
KVIP-FM	LIC	PACIFIC CASCADE COMMUNICATIONS C	251 C	521.0	30 H	N 40° 39' 18.0"	103.1	104.9	96.00
REDDING		CA	BMLED-19971006KC	98.1	1045.0	30 V W 122° 31' 21.0"	283.9	8.919	CLOSE
890505MA	USE	E. LARA SHAINIS	252 C2			N 42° 22' 56.0"	12.6	171.7	56.00
HARBECK-FRUITDALE		OR		98.3		W 123° 16' 29.0"	192.9	115.7	CLEAR
City as show									
NEW	APP	MIRIAM MEDIA, INC.	253 A			N 40° 56' 50.0"	49.2	12.40	89.00
WILLOW CREEK		CA	BSFH-20061218ADR	98.5		W 123° 37' 10.0"	229.3		
NOTE: Short Form for this proposal									
	VAC		253 A			N 40° 56' 50.0"	49.2	12.40	89.00
WILLOW CREEK		CA	RM-10020	98.5		W 123° 37' 10.0"	229.3		
NOTE: Allotment for this upgrade proposal									
KSAY	LIC	AXELL BROADCASTING	253 B1	138.0	3.5 H	N 39° 28' 03.0"	180.9	156.2	114.0
FT. BRAGG		CA	BLH-19960507KB	98.5	241.0	3.5 V W 123° 45' 34.0"	0.9	42.24	CLEAR
KSAY	USE	AXELL BROADCASTING	253 B1			N 39° 28' 03.0"	180.9	156.2	114.0
FT. BRAGG		CA		98.5		W 123° 45' 34.0"	0.9	42.24	CLEAR
KSXY	LIC	COMMONWEALTH BROADCASTING, LLC	254 A	572.0	0.165 H	N 38° 47' 16.0"	159.8	246.5	142.0
MIDDLETOWN		CA	BLH-20020529ABJ	98.7	1205.0	0.165 V W 122° 44' 50.0"	340.4	104.5	CLEAR
KRVC	CP	OPUS BROADCASTING SYSTEMS, INC.	255 C2	757.0	1.25 H	N 42° 05' 00.0"	32.2	159.5	117.0
HORN BROOK		CA	BMPH-20061127AAK	98.9	2045.0	1.25 V W 122° 42' 00.0"	212.9	42.51	CLEAR
KJNY	LIC	REDWOOD BROADCASTING COMPANY	256 C1	523.0	6 H	N 40° 30' 03.0"	228.6	62.59	76.00
FERNDAL		CA	BLH-19961202KB	99.1	744.0	6 V W 124° 17' 08.0"	48.2	-13.4	SHORT
NOTE: Contingent filing proposed for involuntary "show cause" of KJNY to ch 249C1; See Table 2 for Section 73.207 Study for KJNY 249C1									
KNNN	LIC	MAPLETON COMMUNICATIONS, LLC	257 C2	465.0	1.6 H	N 40° 39' 15.0"	103.1	105.1	56.00
SHASTA LAKE CITY		CA	BLH-20010605AAC	99.3	996.0	1.6 V W 122° 31' 12.0"	283.9	49.15	CLEAR

>> End of channel 254 C3 study <<

Delawder Communications, Inc.
Alexandria, VA

TABLE 2, Page 1 of 1
Wednesday, April 04, 2007

BIAfn/Dataworld FM Spacing Study

Title: Ferndale CA 249C1

Channel: 249 C1 (97.7 MHz)

Database: FCC 4/4/2007 12:00:00 AM

Latitude: N 40° 30' 03.0"
Longitude: W 124° 17' 08.0"
Safety Zone: 50.0 km

Call City of License	Auth	Licensee name St	FCC File Number	Chan Freq	HAAT(m) HAMS(L)(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
KNCQ REDDING	USE	RESULTS RADIO OF REDDING LICENSE CA		247 C 97.3			N 40° 36' 10.0" W 122° 38' 58.0"	84.8 265.8	139.0 34.05	105.0 CLEAR
Coordinates updated from LIC record BLH851104K										
KNCQ REDDING	LIC	RESULTS RADIO OF REDDING LICENSE CA	BLH-19851104KF	247 C 97.3	1088.0 1913.0	28 H 28 V	N 40° 36' 10.0" W 122° 38' 58.0"	84.8 265.8	139.0 34.05	105.0 CLEAR
KABX-FM MERCED	USE	MAPLETON COMMUNICATIONS, LLC CA		248 B 97.5			N 37° 22' 31.0" W 120° 27' 37.0"	135.2 317.6	480.0 285.0	195.0 CLEAR
Coordinates updated from LIC record BLH787										
KVRV MONTE RIO	LIC	MAVERICK MEDIA OF SANTA ROSA LIC CA	BLH-19920226KB	249 B1 97.7	342.0 513.0	2.05 H 2.05 V	N 38° 32' 25.0" W 122° 57' 40.0"	152.1 332.9	245.7 12.66	233.0 CLOSE
KRAT ALTAMONT	APP	GEORGE J. WADE OR	BMPH-19990429IA	249 C1 97.7	522.0 1931.0	22 H 22 V	N 42° 10' 06.0" W 122° 09' 10.0"	43.1 224.6	257.2 12.24	245.0 CLOSE
KRAT ALTAMONT	APP	GEORGE J. WADE OR	BMPH-19990429IA	249 C1 97.7	522.0 1931.0	21.8 H 21.8 V	N 42° 10' 06.0" W 122° 09' 06.0"	43.2 224.6	257.3 12.30	245.0 CLOSE
KHHZ GRIDLEY	RSV	DEER CREEK BROADCASTING, LLC CA		249 B1 97.7			N 39° 34' 13.0" W 121° 25' 22.0"	112.1 293.9	265.3 32.29	233.0 CLEAR
KHHZ OROVILLE	LIC	DEER CREEK BROADCASTING, LLC CA	BLH-19970501KD	249 B1 97.7	389.0 1003.0	1.5 H 1.5 V	N 39° 30' 18.0" W 121° 18' 35.0"	112.6 294.6	277.1 44.13	233.0 CLEAR
From channel 249A per D88-19										
KHHZ GRIDLEY	APP	DEER CREEK BROADCASTING, LLC CA	BPH-20070126ADB	249 B1 97.7	389.0 1003.0	1.5 H 1.5 V	N 39° 30' 18.0" W 121° 18' 35.0"	112.6 294.6	277.1 44.13	233.0 CLEAR
KPOD-FM CRESCENT CITY	LIC	KPOD, LLC CA	BMLH-20010702AAP	250 A 97.9	-39.0 93.0	6 H 6 V	N 41° 45' 35.0" W 124° 11' 28.0"	3.2 183.3	140.0 7.030	133.0 CLOSE
KVIP-FM REDDING	LIC	PACIFIC CASCADE COMMUNICATIONS C CA	BMLED-19971006KC	251 C 98.1	521.0 1045.0	30 H 30 V	N 40° 39' 18.0" W 122° 31' 21.0"	82.9 264.0	150.3 45.26	105.0 CLEAR
KXBX-FM LAKEPORT	LIC	BICOASTAL MEDIA, LLC CA	BLH-20010207AAH	252 A 98.3	112.0 713.0	4.8 H 4.8 V	N 39° 02' 56.0" W 122° 46' 03.0"	140.7 321.7	207.1 132.1	75.00 CLEAR

>> End of channel 249 C1 study <<

**Delawder Communications, Inc.
Alexandria, VA**

TABLE 3, Page 1 of 1
Wednesday, August 20, 2008

BIAfn/Dataworld FM Spacing Study

Title: KPOD-FM Crescent City, CA for Channel 259C2

Channel: 259 C2 (99.7 MHz)

Database: FCC 8/20/2008 12:00:00 AM

Latitude: N 41° 48' 25.0"
Longitude: W 124° 10' 16.0"
Safety Zone: 65.0 km

Call City of License	Auth	Licensee name St	FCC File Number	Chan Freq	HAAT(m) HAMS(L)(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
KKLJ	LIC	EDUCATIONAL MEDIA FOUNDATION		*205 A	666.0	0.11 H	N 42° 04' 05.0"	80.2	184.8	15.00
KLAMATH FALLS		OR	BLED-20080509ADE	88.9	2017.0	0.11 V	W 121° 58' 13.0"	261.7	169.8	CLEAR
DA: ODD FORM 340 @ 0.0°										
KSMF	LIC	OREGON ST BOARD OF HIGHER ED FOR		*206 C2	412.0	2.3 H	N 42° 17' 54.0"	64.6	129.7	20.00
ASHLAND		OR	BLED-19920511KA	89.1	1172.0	2.3 V	W 122° 44' 59.0"	245.5	109.7	CLEAR
KJNY	USE	REDWOOD BROADCASTING COMPANY		256 C1			N 40° 34' 42.0"	183.1	136.6	79.00
FERNDAL		CA		99.1			W 124° 15' 36.0"	3.1	57.65	CLEAR
KNNN	LIC	MAPLETON LICENSE OF REDDING, LLC		257 C2	465.0	1.6 H	N 40° 39' 15.0"	132.3	188.6	58.00
SHASTA LAKE CITY		CA	BLH-20010605AAC	99.3	996.0	1.6 V	W 122° 31' 12.0"	313.4	130.6	CLEAR
KAGO-FM	USE	NEW NORTHWEST BROADCASTERS, LLC		258 C1			N 42° 12' 56.0"	76.2	201.7	158.0
KLAMATH FALLS		OR		99.5			W 121° 47' 56.0"	257.7	43.68	CLEAR
KAGO-FM	LIC	NEW NORTHWEST BROADCASTERS, LLC		258 C1	112.0	60 H	N 42° 12' 56.0"	76.2	201.8	158.0
KLAMATH FALLS		OR	BLH-20050902ABI	99.5	1439.0	60 V	W 121° 47' 51.0"	257.8	43.80	CLEAR
KTOR	USE	SIERRA RADIO, INC.		259 A			N 40° 20' 00.0"	122.9	294.8	166.0
CHESTER		CA		99.7			W 121° 15' 13.0"	304.8	128.8	CLEAR
KZRO	LIC	BIG TREE COMMUNICATIONS		261 C3	71.0	12.5 H	N 41° 17' 30.0"	109.0	171.0	56.00
DUNSMUIR		CA	BLH-20001002AGI	100.1	1514.0	12.5 V	W 122° 14' 21.0"	290.3	115.0	CLEAR
KRWQ	USE	BICOASTAL MEDIA LICENSES VI, LLC		262 C1			N 42° 27' 07.0"	51.7	116.8	79.00
GOLD HILL		OR		100.3			W 123° 03' 20.0"	232.4	37.79	CLEAR
Coordinates updated from LIC record BLH800903A										
KRWQ	LIC	BICOASTAL MEDIA LICENSES VI, LLC		262 C1	306.0	30 H	N 42° 27' 11.0"	51.6	116.8	79.00
GOLD HILL		OR	BLH-20070614AAN	100.3	860.0	30 V	W 123° 03' 22.0"	232.4	37.83	CLEAR

>> End of channel 259 C2 study <<

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET SW
WASHINGTON DC 20554

JUL 31 2008

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio

PROCESSING ENGINEER: Tung Bui
TELEPHONE: (202) 418-2778
FACSIMILE: (202) 418-1410
MAIL STOP: 1800B3
INTERNET ADDRESS: tung.bui@fcc.gov

Miriam Media, Inc.
6117 Lemon Thyme Drive
Alexandria, VA 22310

In re: NEW(FM), Willow Creek, CA
Facility ID #170982
Miriam Media, Inc. ("Miriam")
BPH-20070406ABY

Dear Applicant:

This letter is in reference to: (1) the above-captioned FM Auction No. 70 application for a new commercial facility, as amended April 27, 2007, to serve Willow Creek, CA and to upgrade from Channel 253A to Channel 254C3; (2) the May 17, 2007 Petition to Deny filed by Redwood Broadcasting, Inc. ("Redwood"); and (3) all other related pleadings. Miriam's application requested the substitution of Channel 249C1 for Channel 256C1 at Ferndale, CA and modification of the FM Station KJNY license.

An engineering study of KJNY's licensed facility on Channel 249C1 reveals that it fails to comply with the spacing requirements of 47 C.F.R. § 73.207 with respect to the first-adjacent channel 250C2 reserved assignment for KPOD-FM, Crescent North, CA.¹ The required spacing pursuant to § 73.207 is 158 kilometers while the actual spacing is 145 kilometers. Therefore, Channel 249C1 cannot be substituted for Channel 256C1 for KJNY. Accordingly, the application must be amended.

Further action on the subject application will be withheld for a period of thirty days from the date of this letter to provide the applicant an opportunity to respond. Failure to respond within this time period will result in the dismissal of the application pursuant to 47 C.F.R. § 73.3568(a). Please note that any amendment must be submitted in the same manner as the original application. This letter does not imply any judgment on the May 17, 2007 Petition to Deny filed by Redwood.

Sincerely,



Rodolfo F. Bonacci
Assistant Chief
Audio Division
Media Bureau

cc: David Tillotson, Esq.
Evan D. Carb, Esq.

¹ See *Report and Order*, MM Docket No. 93-31, released July 30, 1993. Station KPOD-FM's license was modified to specify operations on Channel 250C2.