

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of RADIO PARADISE in support of its Application for Construction Permit to operate a Low Power FM station on Channel 276 (103.1MHz) in Las Vegas, Nevada.

It is proposed to mount a standard two-bay circularly polarized antenna at the 58-meter level of a proposed 60-meter tower. The proposed effective radiated power is 100 watts. Exhibit B is a map upon which the proposed 60 dBu service contour for the proposed facility is plotted. It is important to note that the proposed location meets all of the Commission's spacing requirements to pertinent co-channel and adjacent-channel full-power, FM translator and LPFM stations, except in one instance. The proposed site is short-spaced to second-adjacent-channel station KISF(FM) in Henderson, Nevada and KCYE(FM) in Boulder City, Nevada. As a result, we request a waiver of the Commission's Rules with respect to KISF(FM) and KCYE(FM) and the justification appears in Exhibit C. We have also determined that the proposed facility should not cause objectionable interference to the input signal of any existing translator station, based on the information contained in the FCC's CDBS database.

Employing the methods of OET Bulletin No. 65, and based on the elevation pattern of a standard 2-bay FM antenna, maximum power density two meters above ground of  $0.00048 \text{ mW/cm}^2$  is calculated to occur 26 meters from the base of the tower. Since this is only 0.2 percent of the  $0.2 \text{ mW/cm}^2$  reference for uncontrolled environments (areas with public access) surrounding a facility operating in the FM band, a grant of this proposal can be considered a minor environmental action with respect to human exposure to non-ionizing electromagnetic

EXHIBIT A

radiation. Further the station owner will take whatever precautionary steps are necessary to ensure that workers operating in the vicinity of the antenna are not exposed to RF energy in excess of the Commission's guideline values.

Due to the diminutive height of the proposed tower and its proximity to the nearest airport runways, the FAA has not been notified of this application. In addition, FCC registration of this structure is not required for the same reasons. This conclusion is supported by the Commission's TOWAIR program.

I declare under penalty of perjury that the foregoing statements and the attached exhibit, which was prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



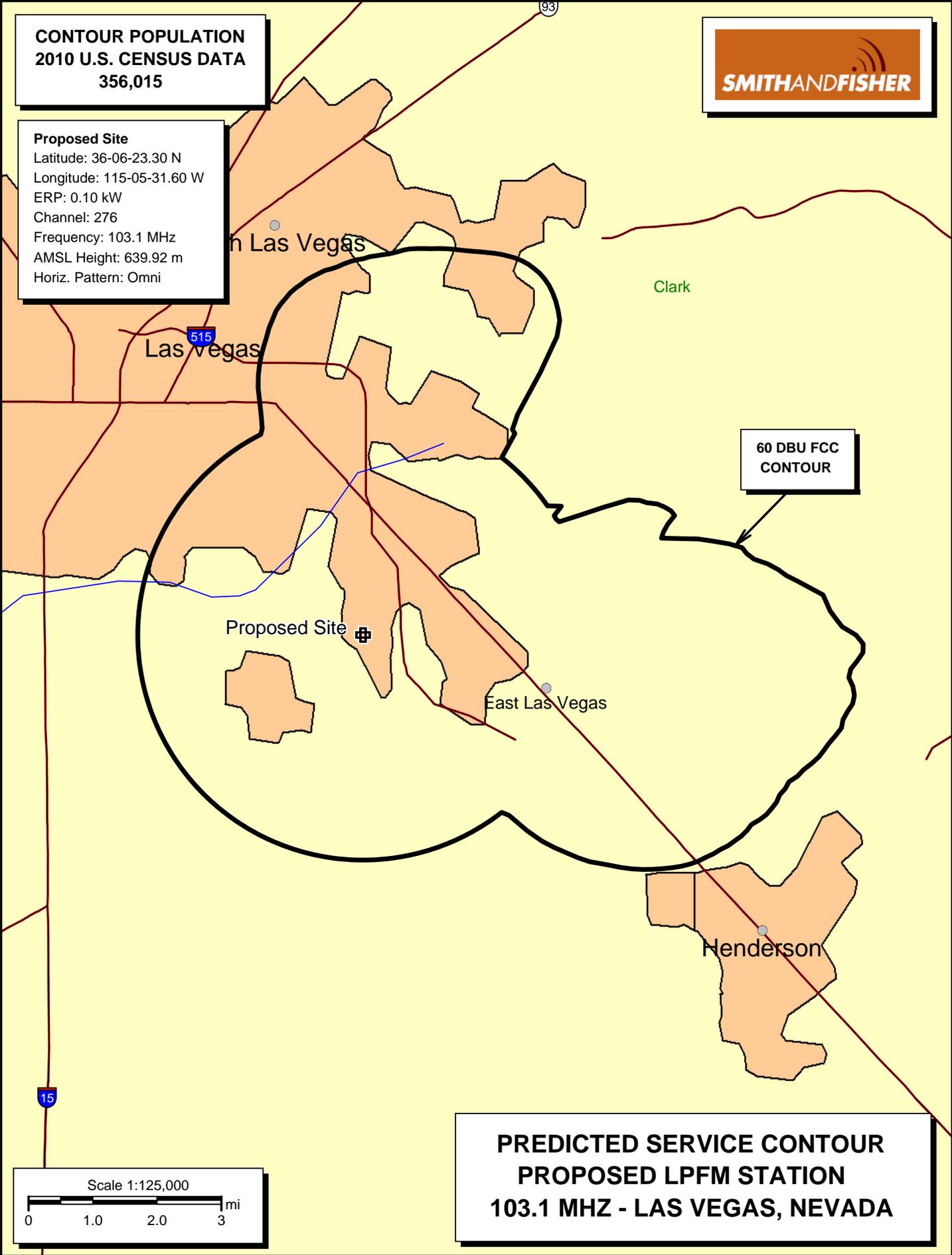
KYLE T. FISHER

November 11, 2013

**CONTOUR POPULATION  
2010 U.S. CENSUS DATA  
356,015**



**Proposed Site**  
Latitude: 36-06-23.30 N  
Longitude: 115-05-31.60 W  
ERP: 0.10 kW  
Channel: 276  
Frequency: 103.1 MHz  
AMSL Height: 639.92 m  
Horiz. Pattern: Omni



**60 DBU FCC  
CONTOUR**

Proposed Site

East Las Vegas

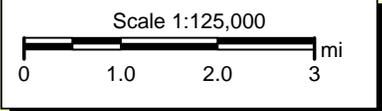
Henderson

Las Vegas

Las Vegas

Clark

**PREDICTED SERVICE CONTOUR  
PROPOSED LPFM STATION  
103.1 MHZ - LAS VEGAS, NEVADA**



REQUEST FOR WAIVER OF SECOND-ADJACENT-CHANNEL SPACING RULE  
PROPOSED LPFM STATION  
CHANNEL 276 – LAS VEGAS, NEVADA

The site proposed herein is located 13.4 kilometers from that of KISF(FM), which operates on Channel 278C in Henderson, Nevada, and 18.3 kilometers from that of KCYE(FM), which operates on Channel 274C in Boulder City, Nevada. Since the required spacing to both stations is 93 kilometers, a waiver of the Commission's spacing rules with regard to these stations is requested and believed to be justified for the reasons stated below.

Attached, as Exhibit C-2, is a map on which the proposed LPFM site is plotted in relation to the KISF 98.7 dBu contour and the KCYE 97.3 dBu contour, both of which pass close to the LPFM site. With a 40 dBu desired-to-undesired ratio for second-adjacent-channel stations applied in both instances, we have also plotted the proposed LPFM proposal's 138.7 dBu and 137.3 dBu interference contours. Both of these contours extends a maximum of 10 meters from the proposed LPFM antenna.

Since the LPFM antenna will be mounted 58 meters above ground level, the proposed interference contour to both stations will exist 48 meters above ground and will therefore have no adverse effect on FM receivers, even if they are being utilized on the roof of a dwelling (10 meters above ground).

Accordingly, a waiver of the Commission's Rules with regard to KISF and KCYE is requested and believed to be justified.



NOTE : BECAUSE THE PROPOSED LPFM ANTENNA WILL BE MOUNTED 58 METERS ABOVE GROUND AND SINCE THE PREDICTED INTERFERENCE CONTOUR TO BOTH KISF AND KCYE EXTENDS ONLY 10 METERS FROM THE PROPOSED ANTENNA, NO RECEIVERS WILL BE AFFECTED.

LAS VEGAS

515

KCYE 97.3 DBU  
FCC CONTOUR

Proposed Site

PROPOSED LPFM  
137.3 AND 138.7 DBU  
CONTOURS (10 m.)

KISF 98.7 DBU  
FCC CONTOUR

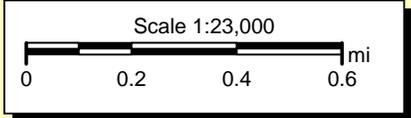


EXHIBIT C-2  
2ND-ADJACENT-CHANNEL WAIVER  
PROPOSED LPFM STATION  
CH. 276 - LAS VEGAS, NEVADA