

# **APPLICATION FOR A MINOR MODIFICATION TO A CONSTRUCTION PERMIT**

**FCC FORM 301**

**File Number – BPH-20010214ACF**

**Facility Identification Number 25526**

**KNKN**

**Pueblo, Colorado**

**CHANNEL 295C2 – 106.9 MHz**

**ERP: 27.5 kW (H&V)**

**HAAT: 202.5 meters (H&V)**

**APPLICANT: Metropolitan Radio Group, Inc.**

**November, 2002**

**Prepared by:**



12585 Old Highway East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020

**Engineering Statement**  
**In Support of a Application for a**  
**Minor Modification to a Construction Permit**  
**KNKN, Pueblo Colorado, Channel 295C2**

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**ENGINEERING STATEMENT**  
**Of**  
**Lee S. Reynolds**  
**And**  
**Virgle Leon Strickland**  
**In Support of an**  
**Application for a Minor**  
**Modification to a Construction Permit**

**KNKN**  
**Pueblo, Colorado**  
**Channel 295C2 – 106.9 MHz**  
**ERP: 27.5 kW(H&V)**  
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**November, 2002**

**General**

As broadcast technical consultants doing business as Reynolds Technical Associates (“RTA”), we have been authorized by Metropolitan Radio Group, Inc. (herein referred to as “Metropolitan” as well as “The Applicant”), licensee of KNKN, Pueblo, Colorado, to conduct engineering studies and prepare the engineering portion of an application for a minor modification to a construction permit, file number BPH-20010214ACF.

This instant application is seeking to change transmitter relocation, effective radiated power and height of radiation center average terrain. The modification is necessary to avoid intrusion into Colorado Bureau of Land Management territory.

**The Proposed Site**  
**(Exhibits E, Figure 1 through 4)**

Exhibit E, Figure 1 is a channel spacing study for the proposed, showing the facilities considered.

The terrain averaging and proposed contour study of the proposed is being included as Exhibit E, Figure 2.

Exhibit E, Figure 3 is the service contour map displaying the FCC F(50,50) 70 and 60 dBu contours of the proposed.

The FAA has been notified of the change in coordinates and upon approval the ASRN will be modified to reflect the change.

Exhibit E, Figure 4 is a vertical sketch of the proposed antenna supporting structure

The distance to the blanketing contour is calculated to be 2.066 kilometer (1.285 mile).

**Human Exposure**  
**(No Exhibits)**

The proposed FM facility was evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with the RF Worksheet #1 [FCC 301 Worksheet 7 (Page 4 and 5)].

The panel antenna for The Applicant's proposed FM broadcast station is to be placed on an existing tower. The proposed center of radiation above ground level of 207.1 meters, with an ERP (both horizontally and vertically) of 27.5 kW. The controlled/occupational limit, as well as the uncontrolled/general public limit is in compliance. Power density two (2) meters above ground is  $0.044 \text{ mW/cm}^2$ , well below the maximum allowable limit of  $0.2 \text{ mW/cm}^2$  for uncontrolled/general public exposure limits as well as the  $1.0 \text{ mW/cm}^2$  for controlled/occupational exposure limits

Should anyone be required to climb the tower, KNKN will either reduce power or cease operation, so as to prevent hazardous exposure to radiofrequency radiation.

**Environmental Impact**  
**(No Exhibits)**

A grant of the proposed construction would not constitute a major action as defined in the Commission's Rules and Regulations.

During operation, the facility will produce no chemical or significant thermal pollution, and no ionizing radiation will be generated. Areas of high intensity radiofrequency fields will be confined to the immediate area of the transmitting antenna, far above the ground and away from any human and wildlife population.

The area is not officially designated as a wilderness area or wildlife preserve and is not pending consideration. The area has no significant value in American history, architecture, archaeology, or culture, which is listed in the Register of Historic Places, and it is not eligible for listing. It is not recognized either nationally or locally for special scenic or recreational value.

**Conclusion**

This statement/application has been prepared for The Applicant by utilizing the latest available information, cross-checked with the Federal Communications Commission and other sources. Therefore, it is submitted that the proposed is in compliance with the Commission's Rules and Regulations and other sources. Therefore, it is submitted that the engineering data compiled and demonstrated herein for the proposed is in compliance with Commission's Rules and Regulations at the time of this application's filing date. We welcome the opportunity to discuss with the staff of the Federal Communications

Commission the engineering data contained in this application. Should any questions arise concerning the information, please contact us.

The following pages are exhibits prepared and assembled in support of the proposed.

Lee S. Reynolds  
12585 Old Highway East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020

Leon Strickland  
12585 Old Highway East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020

### **Statement of the Consultants**

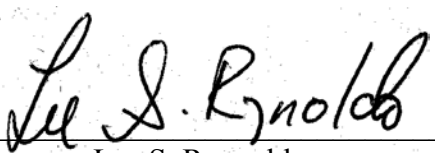
The instant engineering statement (application for a minor modification of a construction permit) was prepared for Metropolitan Radio Group, Inc. ("The Applicant") and supports an application for a construction permit of KNKN, Pueblo, Colorado. It was developed by Lee S. Reynolds and Virgle Leon Strickland of Reynolds Technical Associates and may not be used for purposes other than submission to the Commission by The Applicant.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of Strickland and/or Reynolds.

It is prepared for The Applicant under contractual agreement, and its certification by Strickland/Reynolds is used accordingly. If The Applicant fails in its contractual obligation, Strickland/Reynolds reserve the right to withdraw its certification.

The information in this application is compiled from the most recent Commission and outside data. Strickland/Reynolds are not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Strickland and Reynolds:

  
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Lee S. Reynolds

November 15<sup>th</sup>, 2002

12585 Old Highway East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020