

**Exhibit B-17**  
**KTWS-FM Channel 252C3 Bend, Oregon**  
**NIER Analysis**

**Facilities Proposed**

The proposed operation will be on Channel 259C2 (99.7 MHz) with a maximum lobe effective radiated power of 26 kilowatts. Operation is proposed with a 4-element circularly-polarized directional antenna. The antenna will be side-mounted on a new tower to be located at Awbrey Butte.

Notice of the proposed tower construction has been filed with the Federal Aviation Administration on FAA Form 7460-1. Upon receipt of the FAA's determination of no hazard, FCC Antenna Structure Registration for the tower will be filed on FCC Form 854, and the resulting Antenna Structure Registration Number will be promptly supplied to the Audio Services Division.

**NIER Analysis**

Awbrey Butte is a multi-user broadcast site hosting a number of FM and TV broadcast stations. Combined Communications plans to relocate its three FM stations to a new 300 foot tower to be constructed adjacent to the 300 foot Oregon Public Broadcasting tower, which in turn is planned to be extended to 350 feet. KMTK will operate from a four-bay directional antenna. KLRR and KTWS will operate diplexed into a six-bay omnidirectional antenna.

Calculations have been made of the maximum power density produced at two meters above ground level by the proposed operations of the Combined Communications Stations and the present operations of the other stations at this site. A worst-case simplified analysis indicates that if the maxima from all facilities at the site were summed as if they occurred at a single point (which they do not), the total would exceed the applicable FCC standards for controlled and uncontrolled environments.

The various broadcast facilities on Awbrey Butte operate from several separate tower sites. Consequently, the maxima from the various facilities do not occur at the same location. Furthermore, the individual tower sites are fenced to prevent casual access to potentially hazardous areas. The terrain falls away steeply from the communications site, which causes actual ground-level radiation levels to fall more rapidly than indicated by these calculations.

Radiofrequency electromagnetic field measurements will be conducted at Awbrey Butte when construction of this facility is completed. Such measurements would be used to identify any specific locations where the operations of KMTK, KLRR, and KTWS cause ground-level radiation levels to exceed the FCC standards for controlled and/or uncontrolled environments, so that remediation efforts (such as fencing off those areas) can be undertaken.

The tower site is fenced and the antenna tower will be posted with warning signs. Pursuant to OST Bulletin No. 65, all station personnel and contractors are required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.