

Exhibit 15

Engineering Statement

KGSP
Parkville, MO
Form 340 minor change application

Channel 213D (90.5 MHz)
0.099kW H/V
18 meters HAAT

October 22, 2009

Prepared by Jeff Sibert
Consulting Engineer

Exhibit 15 – Engineering Statement
KGSP form 340 minor change
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This engineering study has been compiled by Jeff Sibert, on behalf of Park University (“Park”) in Parkville, MO for non-commercial educational FM station KGSP (Fac. 6105). This application proposes a minor change for the licensed facility of KGSP (BLED-957) to increase effective radiated power, change channel, and convert to circular polarization.

Reason for application:

This application seeks to augment the KGSP broadcast facilities which serves Parkville, MO. KGSP is presently licensed for 6 watts ERP horizontal at 18 meters HAAT on channel 212D. Park wishes to specify 99 watts (0.099kW) ERP circular on channel 213D. No other changes are proposed.

KGSP presently is severely short-spaced to licensed facility KKFI which operates on channel 211C1 on a first adjacent frequency. The 60dBu contour of KKFI is contained entirely within KGSP's 60dBu protected and 54 dBu interfering contours. As such, both facilities are currently receiving interference. This situation has existed since February 28, 1988 when KKFI first signed on the air as a new class C1 station. Several previous attempts by Park to remedy this situation have been unsuccessful. As a result of this severe short-spacing, KGSP does not have reliable coverage within much of its 60dBu contour and its community of license.

To make matters worse, KKFI is planning to add in-band-on-channel digital operations within the next couple years, at which time KGSP will experience a further degradation of its signal due to the digital sidebands which will be present on KGSP's frequency. It is expected the current six watt signal will degrade to the point of no longer being receivable except within a few blocks of its transmitter on the Park University campus.

Park therefore requests that this application be treated as a displacement application and requests a change in channel to mitigate the received interference.

Channel selection:

Class D stations, such as KGSP, are required to comply with section 73.512 when making channel changes. In order to comply with this provision, all 101 channels available to class D educational FM broadcast stations were studied in an effort to determine the best frequency.

As required by this rule, the 80 non-reserved channels (221D to 300D) were first studied, followed by channel 200D (87.9 Mhz), then the 20 remaining reserved channels (201D to 220D). As KGSP is located in a major metropolitan area (Kansas City), few frequencies were available for selection. None of the non-reserved channels are available without also requesting a waiver of 73.509 to cause second or third adjacent interference. Also, a number of pending translators filed during the March 2003 window additionally will prevent, or may some day prevent, operation on many second or third adjacent channels. As these translators are granted KGSP would wind up having to move channels once again. Channel 200D is unavailable due to prohibited interference to first-adjacent KJTY Topeka, KS (BPED-20081120ACD) and therefore cannot be used. Of the remaining reserved channels, channel 213D (90.5 Mhz) provides the least impact to licensed stations. Only one interference waiver is required to second-adjacent KKFI, and the interference caused to this station already exists and will in fact be significantly reduced. A tabulation of the 101 channels and the reason for the selection is attached to this application as exhibit 15b.

Waiver of power limitations

Park requests waiver of 73.506(a)(1) to allow KGSP to operate with greater than 10 watts transmitter power output (TPO). Section 73.506(a)(1) states “A class D educational (secondary) station is one operating with no more than 10 watts transmitter power output.”

The commission has recently been granting class D educational stations waivers of this rule¹ provided the protected 60dBu contour does not exceed 5.4 km, which is the minimum class A contour distance.

The decision from Media Bureau Asst. Chief James Bradshaw which initially allowed class D educational station WRTE, Chicago to exceed 10 watts TPO is attached as exhibit 16b. KGSP proposes to operate with 99 watts ERP at 18 meters HAAT, which is less than the minimum class A facilities of 100 watts at 30 meters HAAT. Therefore it is believed this proposal would be consistent with previous waivers. Park will require approximately 165 watts transmitter output power to achieve the desired 99 watt ERP.

Community of License:

The community of license is Parkville, MO. No change to the community of license is proposed. As a class D station KGSP is not required to comply with the community of license requirements, however it will provide 60dBu service to the entire community of Parkville, MO.

Height above average terrain:

Eight equally-spaced radials were plotted from 3.2 to 16 km starting at 0 degrees true. The average of these eight radials was approximately 18 meters.

Contour Protection:

Section 73.509 contour protection showings are attached in exhibit 16.

Channel Spacing:

Section 73.207 intermediate frequency (53 or 54 channels above the fundamental frequency) study is fully met to station KCFX by employing less than 100 watts ERP. Although class D educational stations are normally not required to protect IF frequencies due to their normal 10 watt TPO maximum, all other class of stations operating at or above 100 watts are required. In an abundance of caution therefore, Park proposes operation at 99 watts in order to provide full Intermediate Frequency protection to KCFX. It should be noted that KGSP presently operates 54 channels below KCFX.

Channel 6 study:

Section 73.525 study is attached as exhibit 19.

FAA requirements:

No change to the existing tower is being modified by this proposal, other than a change in the antenna which will be mounted at the same height. Therefore the FAA was not notified of this change.

¹ See BPED-20000609ABC WRTE-FM Chicago, IL decision dated November 29, 2000 granting waiver for WRTE to operate with an ERP of 60 watts and transmitter output power of 90 watts. WRTE's 60dBu service contour was less than the class A minimum. See also KASB Bellevue, WA, KRVH Rio Vista, CA, WPUM Rensselaer, IN, WYDM Monroe, MI, and WVAC Adrian, MI which all specified transmitter power in excess of ten watts and were granted by the commission.

Environmental Impact Assessment:

The full environmental impact assessment is located in exhibit 22.

Blanketing interference:

The 115dBu blanketing contour for a 99 watt station is predicted to travel 124 meters. The blanketing contour for the presently licensed KGSP is 31 meters. The additional area primarily includes the Park University campus and very few residential areas. Nevertheless, Park University recognizes its duty under 73.318 to resolve complaints of interference within this area during the first year of operation with these facilities and will comply these requirements.

Certification and full disclosure:

I, Jeff Sibert, have prepared this application for Park University for the underlying KGSP minor change. In the interest of full disclosure, I disclose that I am the vice president of the Mid-Coast Radio Project (licensee of KKFI) Board of Directors and an engineer for KKFI. I have prepared this application without remuneration for the purpose of resolving some very old interference issues between KGSP and KKFI which are expected to worsen following KKFI's planned addition of IBOC digital broadcasts. Neither Park University nor Mid-Coast Radio Project have received any compensation, monetary or non-monetary, for this application nor has this action been taken pursuant to any current request by either party to resolve these interference issues. I am solely acting as a concerned engineer who wishes to assist both organizations in reducing interference caused to one another's broadcasts. Park University remains under no obligation from Mid-Coast Radio Project to make any changes to its broadcast facility.

I further certify and declare, under penalty of perjury, that the information in this application has been prepared in good faith and that this application is believed to fully comply with all commission rules and regulations, except in limited cases where waivers of said rules have been requested.

Jeff Sibert
Consulting Engineer for KGSP
October 22, 2009