

**Proposed Minor Modification**

This minor modification proposes a coordinates correction, resulting in a correction of the site & tower AMSL, antenna COR AMSL, and HAAT, and a decrease in ERP including a slight change in the directional pattern.

	LICENSED	CONSTRUCTION PERMIT	PROPOSED
CHANNEL	216	216	216
CLASS	C3	C1	C1
ERP	1.6 kW, Vertical-only, non-DA	44.8 kW, Circular, DA	40.8 kW, Circular, DA
HAAT	303 M	316 M	325 M
COORDINATES	35 37 37 / 115 16 11	35 37 37 / 115 16 11	35 37 41 / 115 16 24
SITE AMSL	1444 M	1444 M	1445 M
Tower AGL	23 M	34 M	34 M
Tower AMSL	1467 M	1478 M	1479 M
COR AGL	19 M	32 M	32 M
COR AMSL	1463 M	1476 M	1477 M

The 1 mV/m contour proposed in this minor modification will be slightly decreased from that specified in the construction permit (2.4% area reduction), however, it will continue to provide 1 mV/m contour coverage to more than 50% of the city of license of Las Vegas, NV, and will overlap the Licensed and Construction Permit 1 mV/m contours. KVKL will operate in compliance with all applicable FCC rules and regulations including those not specifically addressed in this minor modification.

The below listed pages of this Exhibit contains information as indicated.

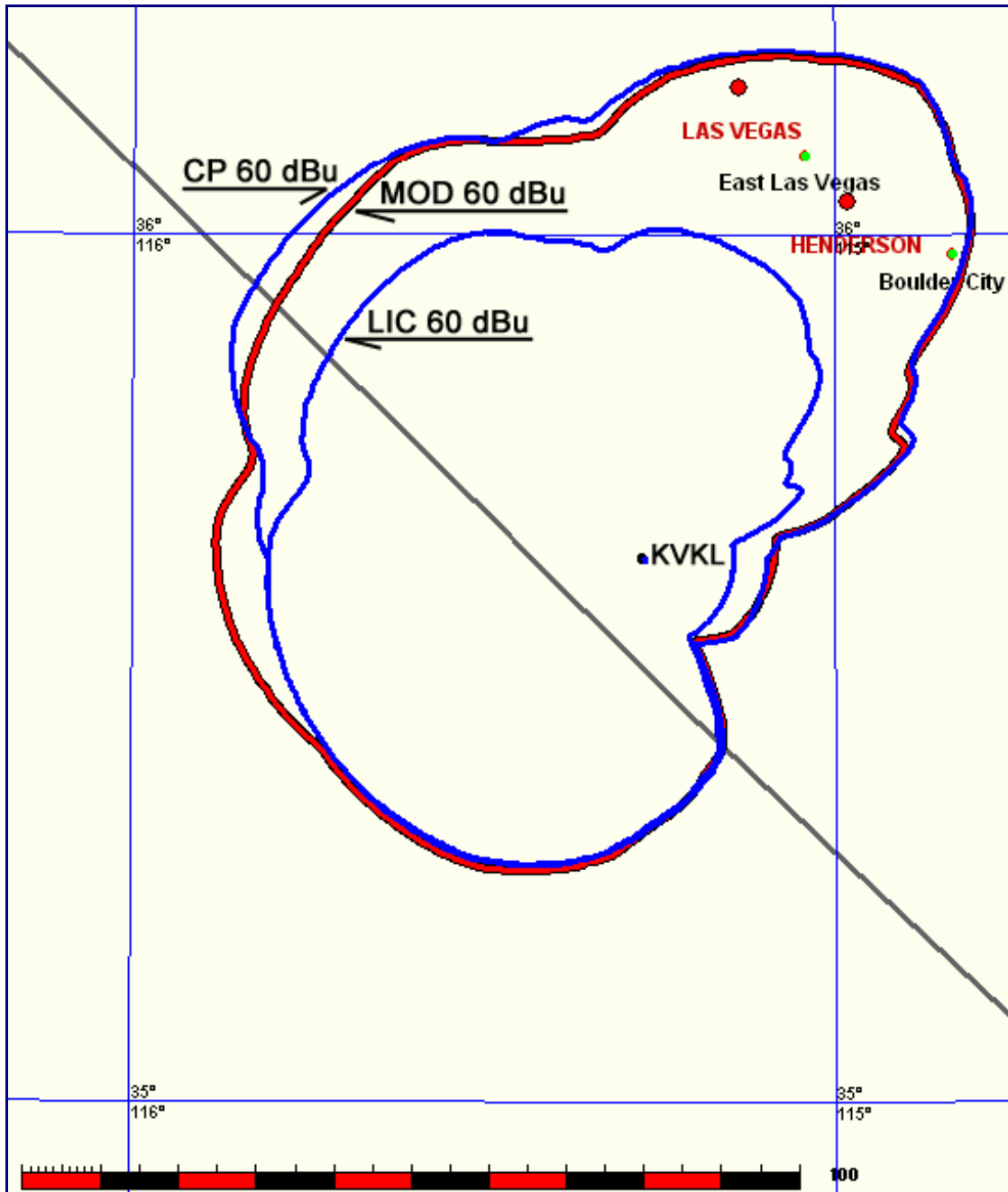
Page 2	Tabulation of HAAT / ERP / distance to 1 mV/m contour
Page 3	Existing and proposed 1 mV/m contour map
Page 4 - 16	Allocation Study

**Tabulation of HAAT / ERP / distances to 1 mV/m contour**

35 37 41 / 115 16 24 40.8 kW ERP (Circular, Directional) 1477 M COR AMSL 325 M HAAT

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	1012.7	464.3	10.0375	10.02	0.496	59.96
010	1005.0	472.0	15.8865	12.01	0.624	65.13
020	1031.1	445.9	25.1420	14.00	0.785	68.31
030	1071.1	405.9	39.5852	15.98	0.985	70.47
040	1174.5	302.5	40.8000	16.11	1.000	63.53
045	1200.2	276.8	32.8647	15.17	0.897	59.55
050	1273.4	203.6	25.7866	14.11	0.795	51.68
060	1354.7	122.3	16.2965	12.12	0.632	38.84
070	1368.6	108.4	10.7373	10.31	0.513	33.72
080	1432.9	44.1	8.4838	9.29	0.456	20.98
090	1551.2	-74.2	7.6849	8.86	0.434	16.88
100	1619.5	-142.5	6.9256	8.40	0.412	16.40
110	1653.6	-176.6	6.2695	7.97	0.392	15.94
120	1631.3	-154.3	5.6765	7.54	0.373	15.51
130	1651.9	-174.9	5.1418	7.11	0.355	15.11
135	1629.2	-152.2	4.1779	6.21	0.320	14.33
140	1570.7	-93.7	3.3140	5.20	0.285	13.54
150	1423.5	53.5	2.1209	3.27	0.228	16.27
160	1287.3	189.7	1.5198	1.82	0.193	27.54
170	1226.1	250.9	1.5198	1.82	0.193	31.59
180	1159.0	318.0	1.5198	1.82	0.193	35.43
190	1071.8	405.2	1.5198	1.82	0.193	39.58
200	1002.8	474.2	1.5198	1.82	0.193	42.72
210	952.7	524.3	1.5198	1.82	0.193	45.19
220	928.1	548.9	1.5198	1.82	0.193	46.45
225	916.8	560.2	1.5198	1.82	0.193	46.98
230	907.1	569.9	1.5198	1.82	0.193	47.41
240	888.3	588.7	1.5198	1.82	0.193	48.19
250	873.2	603.8	1.9390	2.88	0.218	51.18
260	864.7	612.3	2.4291	3.85	0.244	53.71
270	876.8	600.2	2.8868	4.60	0.266	54.96
280	942.1	534.9	3.2446	5.11	0.282	53.13
290	919.2	557.8	3.4077	5.32	0.289	54.81
300	882.7	594.3	3.5989	5.56	0.297	56.92
310	871.4	605.6	3.7706	5.76	0.304	57.80
315	867.8	609.2	3.9971	6.02	0.313	58.52
320	867.4	609.6	4.2303	6.26	0.322	59.10
330	880.6	596.4	5.0553	7.04	0.352	60.40
340	940.4	536.6	4.8001	6.81	0.343	57.09
350	1024.1	452.9	6.3336	8.02	0.394	54.84

**1 mV/m Contour Map**  
**Licensed, Construction Permit, Proposed Minor Modification**



**Southern Nevada Educational Broadcasters  
KVKL, Las Vegas, NV, Facility ID 88719  
Modification of Construction Permit BMPED-20070305ABP**

**Exhibit 16  
December 2008**

**Allocation Study**

CH 216 C1      40.8 kW ERP (DA)      325 M HAAT      1477 M COR AMSL      35 37 41 / 115 16 24

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
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**Reference station:**

216C3 KVKL Las Vegas	LIC VX NV	110.7 290.7	0.35 BLED20061201AJD	35 37 37.0 115 16 11.0	1.600 303	119.3 1463	47.3 Southern Nevada Educational	-134.85* -116.10*
216C1 KVKL Las Vegas	CP DCX NV	110.7 290.7	0.35 BMPED20070305ABP	35 37 37.0 115 16 11.0	44.800 316	133.8 1476	56.2 Southern Nevada Educational	-149.36* -125.00*

**First, second, & third adjacent channel relationships (more detailed study included for yellow highlighted):**

213C KSOS Las Vegas	LIC CN NV	29.7 209.8	48.61 BLED19850819KW	36 00 29.0 115 00 20.0	100.000 387	3.2 1074	31.0 Faith Communications Corpo	-25.00* 8.77
215C1 NEW Beatty	CP DCX NV	316.3 135.3	202.70 BNPED20071018ARO	36 56 05.0 116 51 00.0	4.000 514	92.5 1774	62.6 Hilltop Church	51.47 53.09
215A KAIZ Mesquite	CP CX NV	31.7 212.3	166.22 BMPED20070306AAJ	36 53 48.0 114 17 23.0	0.400 247	41.1 1145	27.1 Educational Media Foundati	55.42 36.79
216A KAIZ Mesquite	LIC CX NV	31.8 212.4	166.47 BLED20050630AGN	36 53 51.0 114 17 10.0	0.400 252	78.5 1145	27.1 Educational Media Foundati	18.35 -22.39
216C3 KNLB Lake Havasu City	LIC CX AZ	142.6 323.2	159.10 BLED20041214AES	34 29 10.0 114 13 06.0	8.000 138	97.6 650	35.4 New Life Christian School	48.26 70.56
216C0 KNLB Lake Havasu City	CP DCX AZ	140.3 320.9	154.77 BPED20050623AAE	34 33 06.0 114 11 37.0	15.000 793	133.6 1435	56.9 New Life Christian School	7.63 42.81
216B KFRJ China Lake	LIC CX CA	266.3 84.9	220.64 BLED20080317AGX	35 28 38.0 117 41 59.0	5.500 386	120.9 1351	49.3 Family Stations Inc	45.13 40.76
217B KWTB Barstow	LIC CX CA	228.8 48.0	164.74 BLED20060106ABX	34 38 39.0 116 37 38.0	1.550 700	80.1 1838	53.7 Living Proof, Inc.	37.37 39.40
218C1 KUNV Las Vegas	LIC CN NV	29.7 209.8	48.59 BLED19840906DM	36 00 28.0 115 00 20.0	15.000 335	2.0 1042	20.1 University System Of High	-23.89* 19.64

**i.f. relationships:**

270C KWID Las Vegas	LIC CX NV	29.6 209.8	48.64 BMLH20020307AAA	36 00 30.0 115 00 20.0	100.000 360	1.9 1067	15.4 Citicasters Licenses, L.p.	40.5R 8.1M
270C KWID Las Vegas	CP NCX NV	29.7 209.8	48.57 BPH20080402AAI	36 00 28.0 115 00 21.0	100.000 452	1.9 1143	15.4 Citicasters Licenses, L.p.	40.5R 8.1M

**CH 6 TV relationships:**

06-2C KMOHTV Kingman	LI DHN AZ	128.5 309.1	105.73 BLCT20020627AAL	35 01 57.0 114 21 56.0	100.000 592	6.4 1377	100.5 Hero Licenseco Llc	176.5R -1.1M
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Terrain database is NGDC 30 SEC Distance + R = 73.215 or FCC spacings in KM, Distance + M = Margin in KM  
Contour distances are on direct line to and from reference station. Reference Zone = . With 3rd Adj Channels.  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
"\*"affixed to 'IN' or 'OUT' values = site inside protected contour.

### **Allocation Study**

The original KVKL modification of license was filed concurrently with and contingent upon an application for a minor change to KAIZ (LIC), CH 216, pursuant to Section 73.3517(E) of the Commission's rules, including an agreement for such between Southern Nevada Educational Broadcasters and Educational Media Foundation, Licensee of KAIZ. The subsequent construction permits for both KVKL and KAIZ were granted based on these contingent filings. The changes proposed in this minor modification of the KVKL (CP) results in a reduction of the protected/interference contours towards KAIZ (CP). The following pages contain a detailed study of the relationship between the proposed minor modification of KVKL and KAIZ (CP).

**Allocation Study**

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

CH 215 KAIZ (CP)  
 .400 kW ERP  
 1145 M COR AMSL  
 36 53 48 / 114 17 23

60 dBu Protected

54 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
010.0	015.8865	0472.0	065.1	225.2	000.4000	0296.5	108.5	28.93
011.0	016.7169	0470.6	065.6	224.8	000.4000	0298.4	107.5	29.27
012.0	017.5684	0468.7	066.0	224.4	000.4000	0300.3	106.5	29.61
013.0	018.4411	0466.4	066.3	224.0	000.4000	0302.4	105.6	29.94
014.0	019.3349	0464.2	066.7	223.5	000.4000	0304.5	104.7	30.27
015.0	020.2499	0461.7	067.0	223.0	000.4000	0306.7	103.8	30.60
016.0	021.1860	0459.3	067.4	222.5	000.4000	0308.9	103.0	30.93
017.0	022.1433	0456.1	067.6	222.0	000.4000	0311.3	102.3	31.23
018.0	023.1217	0452.4	067.8	221.4	000.4000	0313.8	101.6	31.53
019.0	024.1213	0448.9	068.1	220.9	000.4000	0316.4	100.9	31.82
020.0	025.1420	0445.9	068.3	220.3	000.4000	0319.0	100.3	32.11
021.0	026.4394	0443.6	068.7	219.7	000.4000	0321.6	099.5	32.43
022.0	027.7695	0441.3	069.1	219.1	000.4000	0324.2	098.8	32.75
023.0	029.1322	0438.5	069.4	218.5	000.4000	0326.8	098.1	33.03
024.0	030.5276	0434.7	069.6	217.8	000.4000	0329.3	097.6	33.28
025.0	031.9556	0430.5	069.9	217.2	000.4000	0331.7	097.1	33.50
026.0	033.4162	0426.3	070.1	216.5	000.4000	0334.0	096.7	33.71
027.0	034.9095	0421.9	070.2	215.8	000.4000	0336.4	096.3	33.89
028.0	036.4354	0417.1	070.4	215.1	000.4000	0338.8	096.0	34.06
029.0	037.9940	0411.7	070.4	214.3	000.4000	0341.3	095.8	34.20
030.0	039.5852	0405.9	070.5	213.6	000.4000	0343.7	095.7	34.31
031.0	039.7058	0399.5	070.1	212.8	000.4000	0346.0	096.0	34.28
032.0	039.8267	0391.6	069.6	212.1	000.4000	0348.1	096.5	34.20
033.0	039.9477	0382.4	069.0	211.4	000.4000	0350.0	097.1	34.08
034.0	040.0689	0372.5	068.3	210.7	000.4000	0351.7	097.8	33.93
035.0	040.1903	0361.8	067.6	210.1	000.4000	0353.3	098.6	33.75
036.0	040.3119	0349.9	066.8	209.4	000.4000	0354.8	099.5	33.54
037.0	040.4336	0336.3	065.9	208.9	000.4000	0356.2	100.6	33.28
038.0	040.5556	0321.9	064.9	208.3	000.4000	0357.5	101.8	32.99
039.0	040.6777	0309.7	064.0	207.8	000.4000	0358.7	102.8	32.73
040.0	040.8000	0302.5	063.5	207.2	000.4000	0360.0	103.5	32.58
041.0	039.1443	0299.9	062.9	206.7	000.4000	0361.1	104.4	32.39
042.0	037.5230	0297.9	062.4	206.2	000.4000	0362.2	105.2	32.21
043.0	035.9359	0293.6	061.6	205.8	000.4000	0363.3	106.2	31.97
044.0	034.3831	0286.4	060.7	205.4	000.4000	0364.1	107.5	31.68
045.0	032.8647	0276.8	059.6	205.1	000.4000	0364.9	108.9	31.33
046.0	031.3805	0265.0	058.2	204.8	000.4000	0365.5	110.5	30.94
047.0	029.9306	0251.5	056.8	204.6	000.4000	0365.9	112.2	30.52
048.0	028.5150	0237.0	055.3	204.5	000.4000	0366.2	114.0	30.07
049.0	027.1336	0221.1	053.6	204.4	000.4000	0366.4	115.9	29.58
050.0	025.7866	0203.6	051.7	204.4	000.4000	0366.4	118.0	29.04

**Allocation Study**

CH 215 KAIZ (CP)  
.400 kW ERP  
1145 M COR AMSL  
36 53 48 / 114 17 23

CH 216 KVKL (CP MOD)  
40.8 kW ERP  
1477 M COR AMSL  
35 37 41 / 115 16 24

60 dBu Protected

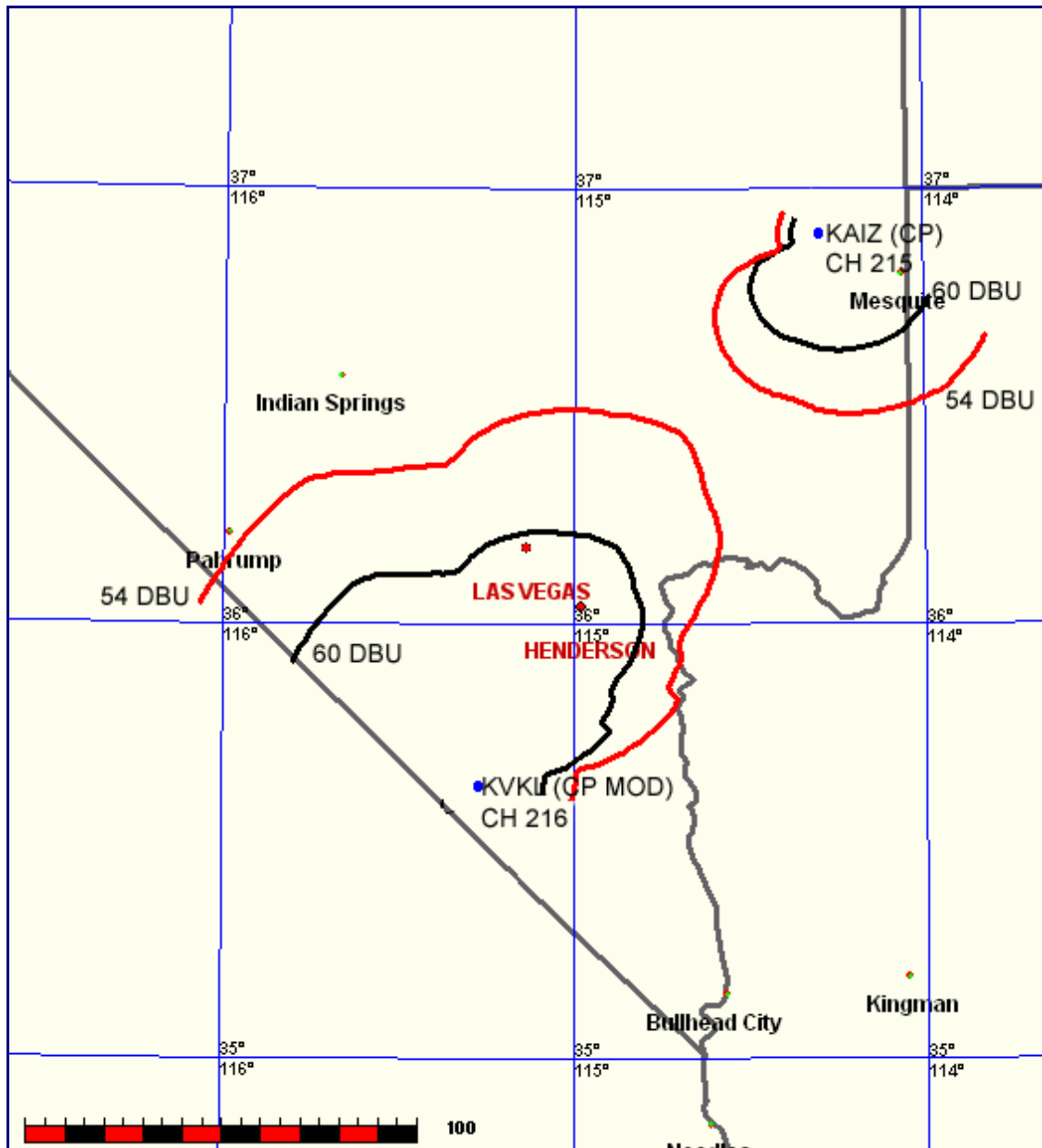
54 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
195.0	000.4000	0373.6	028.1	035.2	040.2124	0359.7	139.7	43.55
196.0	000.4000	0373.5	028.1	035.0	040.1896	0361.8	139.5	43.64
197.0	000.4000	0373.4	028.1	034.8	040.1665	0363.9	139.4	43.73
198.0	000.4000	0373.1	028.1	034.6	040.1432	0366.0	139.3	43.82
199.0	000.4000	0372.8	028.0	034.4	040.1198	0368.1	139.1	43.90
200.0	000.4000	0372.5	028.0	034.2	040.0962	0370.1	139.0	43.98
201.0	000.4000	0371.7	028.0	034.0	040.0723	0372.2	138.9	44.06
202.0	000.4000	0370.6	028.0	033.8	040.0482	0374.2	138.8	44.13
203.0	000.4000	0369.1	027.9	033.6	040.0239	0376.2	138.8	44.19
204.0	000.4000	0367.2	027.8	033.4	039.9995	0378.2	138.8	44.25
205.0	000.4000	0365.1	027.8	033.2	039.9751	0380.2	138.8	44.30
206.0	000.4000	0362.8	027.7	033.0	039.9507	0382.1	138.8	44.35
207.0	000.4000	0360.5	027.6	032.8	039.9264	0384.1	138.8	44.39
208.0	000.4000	0358.2	027.5	032.6	039.9022	0385.9	138.9	44.43
209.0	000.4000	0355.9	027.4	032.4	039.8781	0387.8	138.9	44.47
210.0	000.4000	0353.5	027.3	032.2	039.8542	0389.5	139.0	44.50
211.0	000.4000	0351.1	027.2	032.0	039.8304	0391.3	139.1	44.53
212.0	000.4000	0348.4	027.1	031.8	039.8068	0393.0	139.2	44.55
213.0	000.4000	0345.5	027.0	031.6	039.7835	0394.6	139.3	44.57
214.0	000.4000	0342.4	026.9	031.5	039.7604	0396.1	139.4	44.57
215.0	000.4000	0339.0	026.8	031.3	039.7376	0397.6	139.6	44.58
216.0	000.4000	0335.6	026.6	031.1	039.7151	0399.0	139.7	44.57
217.0	000.4000	0332.2	026.5	030.9	039.6929	0400.3	139.9	44.57
218.0	000.4000	0328.7	026.3	030.7	039.6711	0401.5	140.1	44.55
219.0	000.4000	0324.6	026.2	030.5	039.6498	0402.6	140.3	44.53
220.0	000.4000	0320.3	026.0	030.4	039.6290	0403.7	140.6	44.50
221.0	000.4000	0315.8	025.8	030.2	039.6087	0404.7	140.8	44.47
222.0	000.4000	0311.3	025.6	030.0	039.5888	0405.7	141.1	44.44
223.0	000.4000	0306.8	025.5	029.9	039.5744	0406.7	141.3	44.38
224.0	000.4000	0302.2	025.3	029.7	039.1232	0407.6	141.6	44.31
225.0	000.4000	0297.4	025.1	029.6	038.8808	0408.5	141.9	44.24
226.0	000.4000	0292.2	024.9	029.4	038.6476	0409.4	142.2	44.17
227.0	000.4000	0286.8	024.7	029.3	038.4241	0410.2	142.6	44.09
228.0	000.4000	0281.2	024.4	029.1	038.2104	0411.0	142.9	44.01
229.0	000.4000	0275.3	024.2	029.0	038.0062	0411.7	143.3	43.93
230.0	000.4000	0269.1	023.9	028.9	037.8135	0412.4	143.7	43.84
231.0	000.4000	0262.8	023.7	028.8	037.6308	0413.0	144.1	43.76
232.0	000.4000	0256.3	023.4	028.7	037.4583	0413.6	144.5	43.67
233.0	000.4000	0249.6	023.1	028.6	037.2978	0414.2	144.9	43.58
234.0	000.4000	0242.5	022.8	028.5	037.1525	0414.7	145.3	43.48
235.0	000.4000	0234.8	022.5	028.4	037.0256	0415.1	145.8	43.38

**Allocation Study**

CH 216 KVKL (CP MOD)  
40.8 kW ERP  
1477 M COR AMSL  
35 37 41 / 115 16 24

CH 215 KAIZ (CP)  
.400 kW ERP  
1145 M COR AMSL  
36 53 48 / 114 17 23





**Allocation Study**

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

CH 216 KNLB (CP)  
 15.0 kW ERP  
 1435 M COR AMSL  
 34 33 06 / 114 11 37

60 dBu Protected

40 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
150.0	002.1209	0053.5	016.3	319.8	002.3215	0689.9	138.8	38.22
151.0	002.0563	0065.9	018.0	319.5	002.2996	0686.7	137.2	38.57
152.0	001.9927	0081.5	019.9	319.2	002.2740	0682.9	135.4	38.94
153.0	001.9301	0098.9	021.8	318.8	002.2456	0678.6	133.7	39.29
154.0	001.8685	0115.3	023.2	318.5	002.2186	0674.5	132.4	39.54
155.0	001.8079	0130.7	024.3	318.2	002.1939	0670.7	131.5	39.68
156.0	001.7482	0146.2	025.3	317.9	002.1684	0666.9	130.6	39.81
157.0	001.6896	0160.9	026.2	317.6	002.1430	0663.3	129.9	39.90
158.0	001.6320	0172.9	026.9	317.3	002.1198	0660.0	129.5	39.93
159.0	001.5754	0182.2	027.3	317.0	002.0993	0657.3	129.3	39.90
160.0	001.5198	0189.7	027.5	316.8	002.0804	0654.9	129.2	39.85
161.0	001.5198	0195.8	027.9	316.5	002.0594	0652.5	129.1	39.82
162.0	001.5198	0200.7	028.3	316.2	002.0393	0650.4	129.0	39.77
163.0	001.5198	0205.4	028.6	316.0	002.0191	0648.5	128.9	39.72
164.0	001.5198	0210.9	029.0	315.7	001.9979	0646.6	128.8	39.67
165.0	001.5198	0217.7	029.4	315.4	001.9750	0645.1	128.7	39.64
166.0	001.5198	0225.2	030.0	315.1	001.9510	0643.7	128.5	39.62
167.0	001.5198	0232.1	030.4	314.8	001.9301	0642.7	128.4	39.59
168.0	001.5198	0238.5	030.8	314.5	001.9107	0642.2	128.3	39.55
169.0	001.5198	0244.9	031.2	314.2	001.8916	0641.9	128.3	39.51
170.0	001.5198	0250.9	031.6	313.9	001.8729	0641.9	128.3	39.46
171.0	001.5198	0256.6	031.9	313.6	001.8544	0642.2	128.4	39.40
172.0	001.5198	0262.8	032.3	313.3	001.8354	0642.7	128.5	39.35
173.0	001.5198	0268.7	032.7	313.0	001.8169	0643.4	128.5	39.29
174.0	001.5198	0274.6	033.0	312.7	001.7985	0644.1	128.7	39.23
175.0	001.5198	0280.8	033.4	312.4	001.7800	0644.9	128.8	39.16
176.0	001.5198	0286.8	033.7	312.1	001.7620	0645.8	128.9	39.08
177.0	001.5198	0291.8	034.0	311.8	001.7451	0646.5	129.2	38.99
178.0	001.5198	0300.3	034.5	311.5	001.7248	0647.2	129.3	38.92
179.0	001.5198	0309.2	035.0	311.2	001.7044	0647.7	129.4	38.84
180.0	001.5198	0318.0	035.4	310.8	001.6841	0648.1	129.6	38.75
181.0	001.5198	0326.1	035.9	310.5	001.6647	0648.3	129.8	38.65
182.0	001.5198	0333.9	036.3	310.2	001.6459	0648.5	130.0	38.54
183.0	001.5198	0342.9	036.8	309.9	001.6277	0648.7	130.2	38.43
184.0	001.5198	0352.3	037.2	309.5	001.6126	0648.9	130.5	38.33
185.0	001.5198	0363.1	037.8	309.2	001.5967	0649.2	130.7	38.22
186.0	001.5198	0373.8	038.2	308.9	001.5816	0649.7	131.0	38.11
187.0	001.5198	0383.0	038.6	308.6	001.5682	0650.4	131.4	37.98
188.0	001.5198	0391.0	039.0	308.3	001.5560	0651.2	131.8	37.85
189.0	001.5198	0397.8	039.3	308.0	001.5448	0652.1	132.2	37.71
190.0	001.5198	0405.2	039.6	307.8	001.5334	0653.2	132.7	37.57

**Allocation Study**

CH 216 KNLB (CP)  
 15.0 kW ERP  
 1435 M COR AMSL  
 34 33 06 / 114 11 37

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

60 dBu Protected

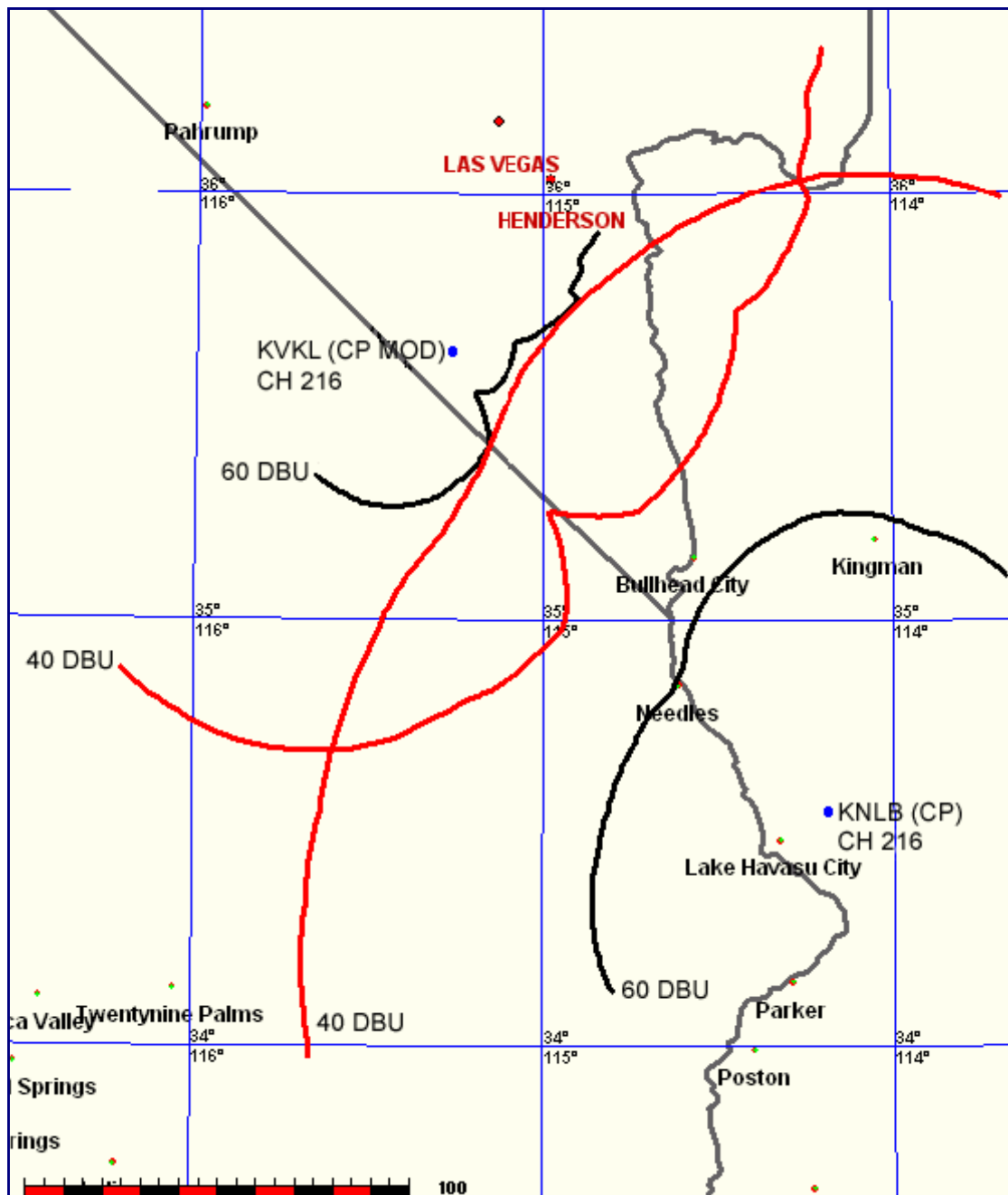
40 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
320.0	002.3404	0692.6	056.1	140.8	003.2076	-0082.0	098.5	31.35
321.0	002.4616	0703.2	057.0	140.2	003.2828	-0090.3	097.6	31.62
322.0	002.5859	0712.2	057.8	139.6	003.3733	-0098.8	096.9	31.89
323.0	002.7132	0720.0	058.5	139.0	003.4762	-0107.3	096.2	32.16
324.0	002.8436	0727.6	059.2	138.4	003.5844	-0115.8	095.6	32.42
325.0	002.9771	0735.4	059.9	137.7	003.6980	-0124.0	095.0	32.67
326.0	003.1136	0743.2	060.6	137.0	003.8169	-0131.9	094.5	32.92
327.0	003.2531	0750.5	061.2	136.3	003.9410	-0139.4	094.0	33.15
328.0	003.3958	0756.8	061.9	135.6	004.0695	-0146.6	093.6	33.38
329.0	003.5415	0762.1	062.5	134.9	004.2022	-0153.4	093.3	33.58
330.0	003.6902	0766.6	063.0	134.1	004.3387	-0159.7	093.0	33.77
331.0	003.8618	0770.5	063.6	133.4	004.4809	-0165.1	092.7	33.97
332.0	004.0373	0774.1	064.2	132.6	004.6270	-0169.0	092.6	34.14
333.0	004.2167	0777.3	064.7	131.8	004.7768	-0171.5	092.4	34.31
334.0	004.4000	0780.5	065.3	131.1	004.9304	-0173.1	092.3	34.47
335.0	004.5871	0783.9	065.8	130.3	005.0877	-0174.5	092.3	34.61
336.0	004.7782	0787.3	066.3	129.5	005.1691	-0175.9	092.3	34.68
337.0	004.9732	0790.5	066.9	128.7	005.2106	-0177.3	092.4	34.70
338.0	005.1721	0793.4	067.4	127.9	005.2521	-0178.3	092.5	34.71
339.0	005.3748	0796.2	067.9	127.1	005.2936	-0178.5	092.7	34.71
340.0	005.5815	0798.8	068.4	126.3	005.3350	-0177.4	092.9	34.69
341.0	005.8725	0801.2	069.0	125.5	005.3790	-0174.8	093.1	34.69
342.0	006.1709	0803.0	069.6	124.7	005.4226	-0171.3	093.3	34.68
343.0	006.4767	0804.2	070.1	123.9	005.4656	-0167.7	093.6	34.65
344.0	006.7899	0804.8	070.6	123.1	005.5080	-0164.2	094.0	34.61
345.0	007.1105	0804.8	071.2	122.3	005.5495	-0161.1	094.4	34.55
346.0	007.4385	0804.8	071.6	121.6	005.5905	-0158.5	094.9	34.48
347.0	007.7738	0804.9	072.1	120.8	005.6310	-0156.3	095.5	34.40
348.0	008.1166	0804.7	072.6	120.1	005.6705	-0154.5	096.1	34.31
349.0	008.4668	0804.0	073.0	119.4	005.7107	-0153.2	096.7	34.21
350.0	008.8243	0803.1	073.5	118.7	005.7501	-0152.5	097.4	34.10
351.0	009.2081	0802.0	073.9	118.1	005.7891	-0152.3	098.2	33.98
352.0	009.6000	0800.9	074.3	117.4	005.8270	-0152.8	099.0	33.85
353.0	010.0001	0800.4	074.7	116.8	005.8644	-0153.9	099.8	33.71
354.0	010.4083	0800.8	075.2	116.1	005.9014	-0155.7	100.6	33.57
355.0	010.8248	0800.6	075.6	115.5	005.9368	-0157.9	101.5	33.42
356.0	011.2493	0799.8	076.0	115.0	005.9705	-0160.5	102.5	33.25
357.0	011.6821	0798.7	076.4	114.4	006.0027	-0163.3	103.5	33.08
358.0	012.1230	0797.5	076.8	113.9	006.0336	-0166.2	104.5	32.90
359.0	012.5721	0796.1	077.1	113.4	006.0631	-0168.9	105.6	32.71
000.0	013.0294	0794.7	077.5	113.0	006.0913	-0171.2	106.6	32.51

**Allocation Study**

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

CH 216 KNLB (CP)  
 15.0 kW ERP  
 1435 M COR AMSL  
 34 33 06 / 114 11 37



### **Allocation Study**

#### Request for Waiver of 47 C.F.R. Section 73.509

Southern Nevada Educational Broadcasters ("SNEB") filed a minor modification on December 5, 2006 (BPED-20061205ACJ) that included a request for a waiver of received interference from second adjacent station KUNV (CH 218), Las Vegas, NV, and third adjacent station KSOS (CH 213), Las Vegas, NV, due to an increase in ERP and antenna height which would allow KVKL to provide the required 60 dBu contour coverage over more than 50% of Las Vegas, NV, the community of license, which the current licensed facility of KVKL does not provide. The minor modification and waiver request was granted on February 6, 2007. A subsequent minor modification and waiver request was filed ((BMPED-20070305ABP) which was granted on July 16, 2007, to further increase KVKL's service area by an increase in ERP. As in the previous waiver request, the minor modification was engineered so as to NOT CAUSE interference to any existing station, known application or allocation, including to either KSOS or KUNV.

This minor modification proposes changes that include a necessary coordinates correction requiring a slight decrease in the ERP and a change in the directional antenna pattern. This results in a continuance of the "overlap received" from KSOS and KUNV as requested in the previously granted waiver requests. This proposal is engineered so as to NOT CAUSE interference to any existing station, known application or allocation, including to either KSOS or KUNV, in that KVKL's proposed 100 dBu interference contour will not overlap the KSOS or KUNV protected 60 dBu contours.

The proposed KVKL 60 dBu contour has an area of 6,831 sq. km, and will continue to completely encompass the 100 dBu interference contours of both KSOS and KUNV, thus this minor modification will result in no "overlap received" area change from either KSOS or KUNV. The KSOS 100 dBu interference contour has an area of 380 sq. km. The "overlap received" area of KSOS's 100 dBu interference contour is 5.56% of KVKL's proposed 60 dBu contour area. The KUNV 100 dBu interference contour has an area of 106 sq. km. The "overlap received" area of KUNV's 100 dBu interference contour is 1.55% of KVKL's proposed 60 dBu contour area.

The first granted waiver request (BPED-20061205ACJ) specified a total "overlap received" area from the KSOS and KUNV 100 dBu interference contours of 7.37% of KVKL's 60 dBu contour area, and increased the 60 dBu coverage area population from 6,351 to 907,780. The second granted waiver request (BMPED-20070305ABP) specified a slight reduction in the total "overlap received" area from the KSOS and KUNV 100 dBu interference contours of 7.14% of KVKL's 60 dBu contour area, and a slight increase in the 60 dBu coverage area population to 1,074,697. Due to the necessary changes proposed in this minor modification, this waiver request proposes a total "overlap received" area from the KSOS and KUNV 100 dBu interference contours of 7.11% of KVKL's 60 dBu contour area, which is slightly less than the 7.14% granted in the BMPED-20070305ABP waiver request. The proposed 60 dBu coverage area population is 1,067,217, representing a slight decrease of .7% from the population specified in the BMPED-20070305ABP waiver request.

Pages 14-16 of this Exhibit contain detailed information on the relationship between KVKL and KSOS and KUNV.

This waiver request is nearly identical to the requests made by the licensees of WCPE (FM) and WCCE (FM) in Educational Information Corporation, 6 FCC Rcd 2207 (1991). WCPE (FM) requested a waiver in its application to permit *de minimus* overlap "received", and WCCE (FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received\*.

\* SNEB wishes to emphasize that its request is not at all similar to the second waiver request made by WCPE in Educational Information Corporation, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in that second case.

**Allocation Study**

Request for Waiver of 47 C.F.R. Section 73.509 (continued)

The grant of this waiver request will continue to allow KVKL to increase its overall 60 dBu coverage area and will also continue to allow KVKL to provide the required 60 dBu contour coverage over more than 50% of Las Vegas, NV, the community of license. It will also result in significant service being maintained and enhanced equal to that proposed in the prior granted waiver requests. The overlap area is small and well within the scope of the Commission's waiver policy, and clearly this benefit heavily outweighs the potential for interference in an area that constitutes no more than 7.11% (total) of KVKL's proposed 60 dBu service area. Accordingly SNEB respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

**Allocation Study**

CH 213 KSOS (LIC)  
 100 kW ERP  
 1074 M COR AMSL  
 36 00 29 / 115 00 20

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

60 dBu Protected

100 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
192.0	100.0000	0035.6	033.3	061.0	015.7095	0116.0	019.8	72.84
193.0	100.0000	0003.8	031.0	055.1	020.7051	0129.2	021.0	73.95
194.0	100.0000	-0022.1	031.0	053.9	021.7790	0134.1	020.7	74.78
195.0	100.0000	-0041.8	031.0	052.8	022.9349	0149.7	020.3	76.30
196.0	100.0000	-0056.6	031.0	051.5	024.1764	0173.4	020.0	78.17
197.0	100.0000	-0069.8	031.0	050.3	025.5102	0198.6	019.7	79.81
198.0	100.0000	-0081.7	031.0	048.9	027.2377	0222.4	019.4	81.33
199.0	100.0000	-0090.8	031.0	047.5	029.1750	0244.0	019.1	82.62
200.0	100.0000	-0095.4	031.0	046.1	031.2514	0263.8	018.9	83.75
201.0	100.0000	-0094.4	031.0	044.6	033.4794	0281.1	018.7	84.76
202.0	100.0000	-0087.0	031.0	043.1	035.8536	0293.3	018.5	85.57
203.0	100.0000	-0075.0	031.0	041.5	038.3787	0299.1	018.3	86.18
204.0	100.0000	-0061.4	031.0	039.8	040.7811	0303.2	018.1	86.69
205.0	100.0000	-0047.7	031.0	038.2	040.5783	0319.3	018.0	87.20
206.0	100.0000	-0034.6	031.0	036.5	040.3727	0343.4	017.9	87.88
207.0	100.0000	-0022.0	031.0	034.8	040.1644	0364.1	017.8	88.45
208.0	100.0000	-0009.7	031.0	033.1	039.9544	0381.8	017.7	88.91
209.0	100.0000	0003.3	031.0	031.3	039.7436	0397.2	017.7	89.29
210.0	100.0000	0017.1	031.0	029.6	038.8898	0408.5	017.7	89.48
211.0	100.0000	0031.5	031.6	027.7	035.9826	0418.6	017.0	89.89
212.0	100.0000	0046.5	037.7	022.6	028.5579	0439.8	011.0	95.93
213.0	100.0000	0061.3	042.4	009.7	015.7127	0472.4	006.7	99.97
214.0	100.0000	0075.3	045.7	343.0	005.2443	0504.9	004.5	99.92
215.0	100.0000	0088.2	048.5	304.1	003.6683	0600.0	004.3	98.91
216.0	100.0000	0100.1	050.9	280.0	003.2446	0534.9	005.7	95.30
217.0	100.0000	0110.5	052.8	270.3	002.8956	0600.0	007.5	92.07
218.0	100.0000	0120.2	054.3	266.2	002.7083	0607.4	009.2	89.53
219.0	100.0000	0129.4	055.6	264.4	002.6279	0610.5	010.8	87.47
220.0	100.0000	0137.7	056.8	263.7	002.5960	0611.3	012.3	85.70
221.0	100.0000	0144.9	057.8	263.9	002.6047	0611.1	013.7	84.25
222.0	100.0000	0151.3	058.6	264.6	002.6365	0610.2	015.0	83.25
223.0	100.0000	0157.2	059.4	265.6	002.6789	0608.7	016.3	82.31
224.0	100.0000	0162.9	060.1	266.6	002.7262	0606.5	017.5	81.42
225.0	100.0000	0168.7	060.7	267.6	002.7751	0604.2	018.7	80.54
226.0	100.0000	0174.6	061.4	268.7	002.8257	0601.9	019.9	79.69
227.0	100.0000	0180.5	062.0	269.8	002.8781	0600.4	021.1	78.88
228.0	100.0000	0186.6	062.5	270.9	002.9181	0599.3	022.2	78.08
229.0	100.0000	0192.9	063.1	271.9	002.9536	0598.3	023.4	77.29
230.0	100.0000	0199.2	063.7	272.9	002.9883	0595.1	024.6	76.47
231.0	100.0000	0205.3	064.3	273.9	003.0230	0589.8	025.8	75.64
232.0	100.0000	0211.4	064.9	274.8	003.0572	0584.5	027.0	74.84

**Allocation Study**

CH 218 KUNV (LIC)  
 15 kW ERP  
 1042 M COR AMSL  
 36 00 28 / 115 00 20

CH 216 KVKL (CP MOD)  
 40.8 kW ERP  
 1477 M COR AMSL  
 35 37 41 / 115 16 24

60 dBu Protected

100 dBu Interference

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
200.0	015.0000	-0127.2	020.1	036.5	040.3787	0342.7	029.0	79.75
201.0	015.0000	-0126.5	020.1	035.9	040.2978	0351.4	028.9	80.03
202.0	015.0000	-0119.5	020.1	035.2	040.2161	0359.4	028.8	80.29
203.0	015.0000	-0107.7	020.1	034.5	040.1337	0366.9	028.8	80.53
204.0	015.0000	-0094.3	020.1	033.8	040.0506	0374.0	028.7	80.74
205.0	015.0000	-0080.7	020.1	033.2	039.9671	0380.8	028.6	80.94
206.0	015.0000	-0067.6	020.1	032.5	039.8832	0387.4	028.6	81.13
207.0	015.0000	-0055.0	020.1	031.8	039.7988	0393.5	028.6	81.30
208.0	015.0000	-0042.7	020.1	031.1	039.7144	0399.0	028.5	81.44
209.0	015.0000	-0029.9	020.1	030.4	039.6299	0403.6	028.5	81.56
210.0	015.0000	-0016.2	020.1	029.7	039.0546	0407.9	028.5	81.61
211.0	015.0000	-0001.9	020.1	029.0	037.9419	0411.9	028.5	81.58
212.0	015.0000	0012.9	020.1	028.3	036.8480	0415.7	028.5	81.54
213.0	015.0000	0027.7	020.1	027.6	035.7730	0419.3	028.6	81.48
214.0	015.0000	0041.7	023.3	026.0	033.4031	0426.4	025.4	83.40
215.0	015.0000	0054.8	026.5	023.7	030.1031	0435.9	022.3	85.38
216.0	015.0000	0066.8	028.9	021.0	026.4819	0443.5	020.1	86.63
217.0	015.0000	0077.3	030.9	017.8	022.9633	0453.0	018.4	87.58
218.0	015.0000	0087.1	032.8	013.9	019.2694	0464.3	016.8	88.27
219.0	015.0000	0096.3	034.4	009.5	015.5346	0472.7	015.6	88.47
220.0	015.0000	0104.8	035.8	004.7	012.6427	0474.4	014.8	88.13
221.0	015.0000	0112.1	036.9	000.2	010.1418	0465.0	014.3	87.55
222.0	015.0000	0118.5	037.7	356.0	008.4454	0432.5	014.1	86.41
223.0	015.0000	0124.4	038.4	352.0	007.0221	0437.4	014.2	85.67
224.0	015.0000	0130.1	039.1	348.2	006.0384	0468.0	014.3	85.36
225.0	015.0000	0135.9	039.8	344.3	005.4357	0493.4	014.5	85.02
226.0	015.0000	0141.7	040.6	340.5	004.8768	0530.9	014.8	84.78
227.0	015.0000	0147.6	041.3	336.9	004.8785	0562.8	015.2	85.08
228.0	015.0000	0153.7	042.1	333.4	004.9673	0582.1	015.6	85.10
229.0	015.0000	0160.0	042.8	330.2	005.0504	0595.8	016.2	84.95
230.0	015.0000	0166.2	043.5	327.3	004.8292	0602.1	016.8	84.36
231.0	015.0000	0172.3	044.2	325.0	004.6311	0604.5	017.5	83.67
232.0	015.0000	0178.3	044.8	323.0	004.4715	0606.7	018.3	82.97
233.0	015.0000	0184.6	045.3	321.4	004.3426	0608.4	019.1	82.27
234.0	015.0000	0191.3	045.8	320.0	004.2282	0609.6	019.9	81.56
235.0	015.0000	0198.5	046.4	318.6	004.1626	0610.4	020.7	80.87
236.0	015.0000	0205.7	047.0	317.3	004.1048	0610.4	021.6	80.17
237.0	015.0000	0212.6	047.5	316.3	004.0577	0609.9	022.5	79.46
238.0	015.0000	0219.0	048.0	315.5	004.0207	0609.5	023.5	78.78
239.0	015.0000	0225.0	048.5	314.9	003.9923	0609.2	024.4	78.11
240.0	015.0000	0230.7	048.9	314.4	003.9716	0609.0	025.3	77.46



CH 216, KVKL proposed 60 dBu and 100 dBu interference contours  
CH 213, KSOS (LIC) & CH 218, KUNV (LIC) protected 60 dBu contours and 100 dBu interference contours ("overlap received" area)

