

Exhibit 16

REFERENCE CH# 209B - 89.7 MHz, Pwr= 0.54 kW DA, HAAT= 715.0 M, COR= 1013 M DISPLAY DATES
36 45 22.0 N. Average Protected F(50-50)= 42.7 km DATA 09-18-10
121 30 06.0 W. Standard Directional SEARCH 09-22-10

CH CITY	CALL	TYPE STATE	ANT	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap	*OUT* in km)
209B Prunedale	KLVM	LIC CA	DCX	0.0 0.0	0.0 BLED20060822AJC	36 45 22.0 121 30 06.0	0.450 715	66.9 1013	19.6 Prunedale Educational	-85.8*	-84.9*
209B1 Los Altos	KFJC	LIC CA	C	318.1 137.7	84.6 BMLD19961105KB	37 19 14.0 122 08 29.0	0.110 562	58.1 820	18.3 Foothill-de Anza Community	8.3	3.7
210A Santa Cruz	KFER	LIC CA	CN	304.3 124.0	50.8 BLED19920212KB	37 00 45.0 121 58 25.0	0.200 8	19.4 174	12.9 Santa Cruz Educational Bro	11.2	6.5
210A Soledad	KFRS	LIC CA	VX	158.8 339.0	57.4 BLED20020408ABB	36 16 25.0 121 16 12.0	0.250 93	34.0 386	22.7 Family Stations, Inc.	3.8	4.9
208A San Martin	1213990	APP CA	CX	346.6 166.5	37.6 BNPED20071022ABX	37 05 06.8 121 36 01.0	0.140 -163	8.8 93	6.1 3. Centro Cristiano Cosech	9.7	1.6
208A San Martin	1211359	APP CA	CX	345.4 165.3	42.6 BNPED20071018ABH	37 07 37.6 121 37 23.5	0.500 -1301	15.7 133	11.0 Centro Cristiano Vida Abun	7.8	1.7
208B Dos Palos	NEW	CP CA	DCX	63.0 243.4	59.8 BNPED20071022BOJ	36 59 54.0 120 54 10.0	50.000 -20	39.7 98	24.4 Calvary Chapel Of Modesto,	2.1	7.6
210A Morgan Hill	1394124	APP CA	DCX	335.5 155.4	36.7 BNPED20071022APW	37 03 24.2 121 40 25.5	0.145 62	4.8 301	3.4 Common Frequency, Inc.	13.3	4.3
212B1 Pacific Grove	KAZU	LIC CA	C	228.5 48.4	34.2 BLED20040105AAN	36 33 09.0 121 47 17.0	3.400 168	3.3 394	39.3 University Corporation At	-16.5*	-6.7*
06NT Yosemite Village	DDK06HD	LI CA	DHN	57.1 238.2	202.4 BLTTV19911007JH	37 43 45.0 119 34 20.0	0.079 873	1.6 2190	39.3 Yosemite Concession Servic	0.0R	202.4M
207A San Martin	1210722	APP CA	CX	350.3 170.3	35.1 BNPED20071018AVQ	37 04 03.0 121 34 05.7	0.100 -164	0.7 105	7.8 Centro Cristiano Sion	15.3	27.0
208A Los Banos	1214089	APP CA	CX	69.8 250.2	64.6 BNPED20071022ABS	36 57 14.5 120 49 13.6	1.500 1	15.9 110	11.2 3. Centro Cristiano Cosech	30.8	25.8
208B1 Dos Palos	1214788	APP CA	DEX	71.6 252.1	81.0 BNPED20071019ARS	36 58 57.0 120 38 19.0	25.000 15	35.6 61	22.7 Samsno Educational Media	27.4	30.5
262B San Jose	KBRG«	LIC CA	C	322.6 142.4	49.8 BMLH19980504KC	37 06 40.0 121 50 34.0	14.500 786	9.2 1200	43.1 Univision Radio License Co	20.0R	29.8M
207A Millers Ranch	NEW	CP CA	CX	176.8 356.9	61.6 BNPED20071018AUT	36 12 06.0 121 27 48.9	0.100 -66	0.7 708	15.2 Centro Palebra De Fe Churc	32.7	45.7
208A Dos Palos	1215590	APP CA	DCX	81.9 262.4	76.8 BNPED20071022BLR	36 51 02.0 120 38 56.0	8.500 55	25.5 142	17.2 Advance Ministries, Inc.	34.1	33.0
207A Ben Lomond	1210272	APP CA	DCX	299.3 119.0	58.1 BNPED20071017AAV	37 00 36.5 122 04 16.5	0.170 180	0.3 327	12.2 Pataphysical Broadcasting	36.1	45.5
06 D Ceres	1330972	AP CA	D N	34.1 214.4	98.8 BNPDVL20090825BYV	37 29 26.8 120 52 26.8	0.300 79	10.1 95	3.8 One Ministries, Inc.	13.9R	84.9M

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference Zone = 1A, Co to 3rd adjacent.
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.
« = Station meets FCC minimum distance spacing for its class.

Prunedale Educational Association ("PEA") wishes to use a directional pattern toward KFER and KFJC. By drawing lines from the proposed facility to the protected contour of KFER and KFJC, the critical arcs between the facilities were determined to be 280° to 340°. The pattern for the proposed facility complies with the 2db per 10 degree rule within this critical arc area.

This method is nearly identical to the application granted to Educational Media Foundation, BMPED-20061031AAY.

Relationship between the proposed facility and KFJC

The facilities of KLVM and KFJC (FIN 59064) are Grandfathered short-spaced stations according to the guidelines set forth in 47 C.F.R. 73.213(a). This proposal seeks to modify the facilities of KLVM.

As can be seen in the map attached to Exhibit 16-A, the proposed KLVM facility decreases the overall amount of interference caused to and received from, co-channel facility KFJC. Section 73.213(a)(2) states that as long as the amount of interference is maintained or reduced, then the proposed facility is in compliance.

Therefore the proposed facility complies with 47 C.F.R. 73.213.

Exhibit 16-A

KLVM

BLED20060822AJC
Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.45 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KLVM.P

Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.54 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KFJC

BMLED19961105KB
Latitude: 37-19-14 N
Longitude: 122-08-29 W
ERP: 0.11 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 820.0 m
Elevation: 805.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

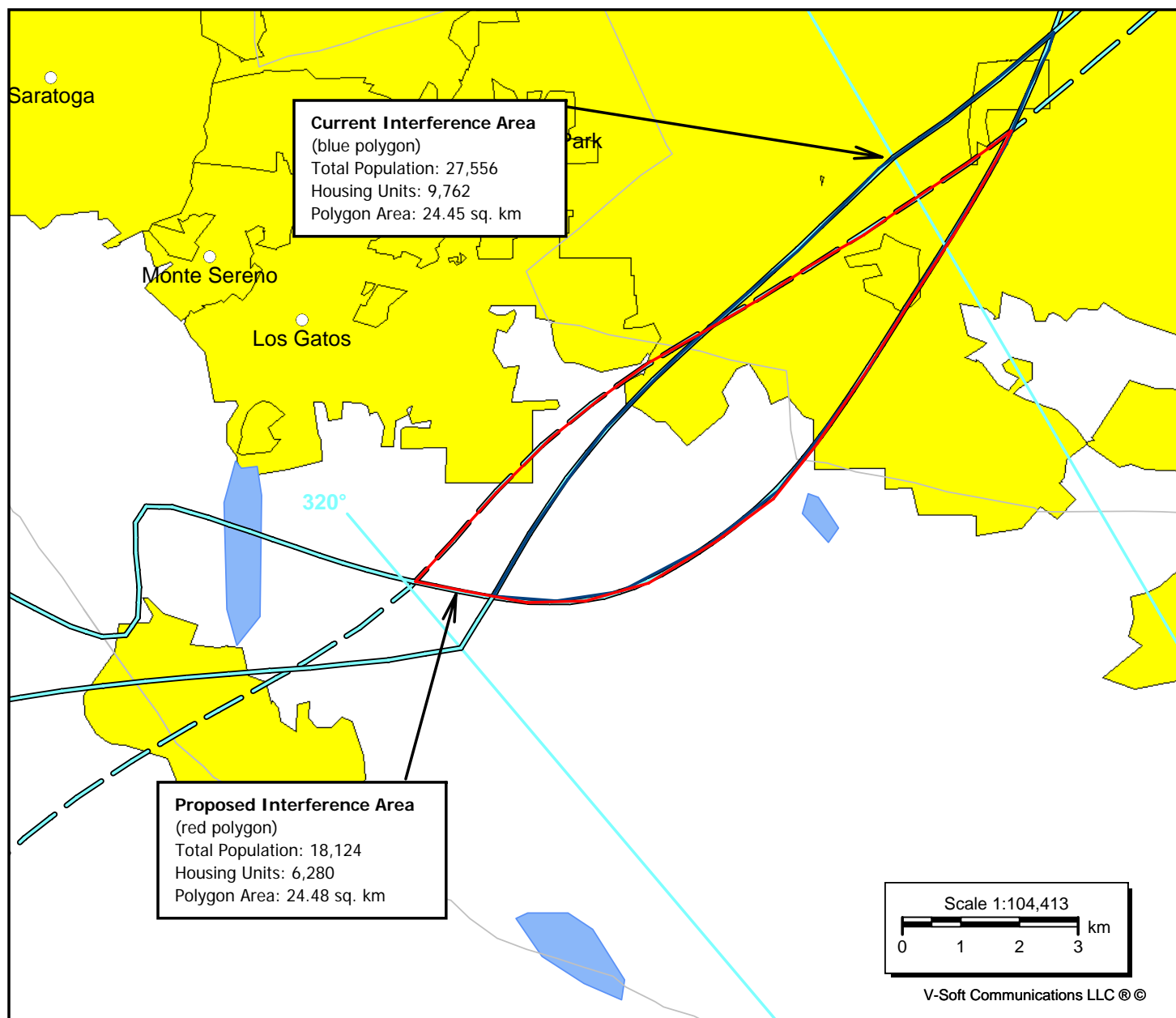


Exhibit 16-B

KLVM.P

Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.54 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KFER

BLED19920212KB
Latitude: 37-00-45 N
Longitude: 121-58-25 W
ERP: 0.20 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 174.0 m
Elevation: 159.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

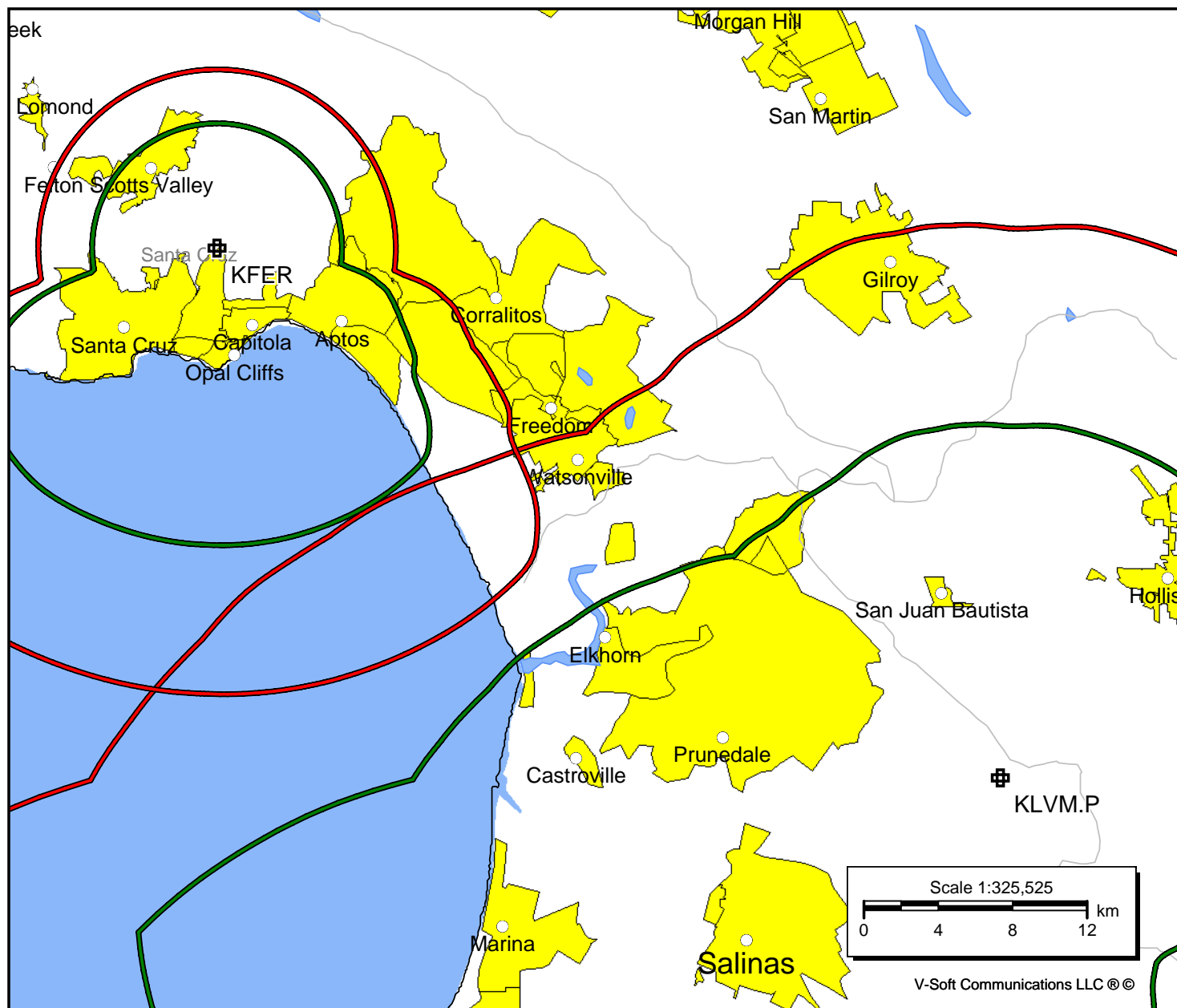
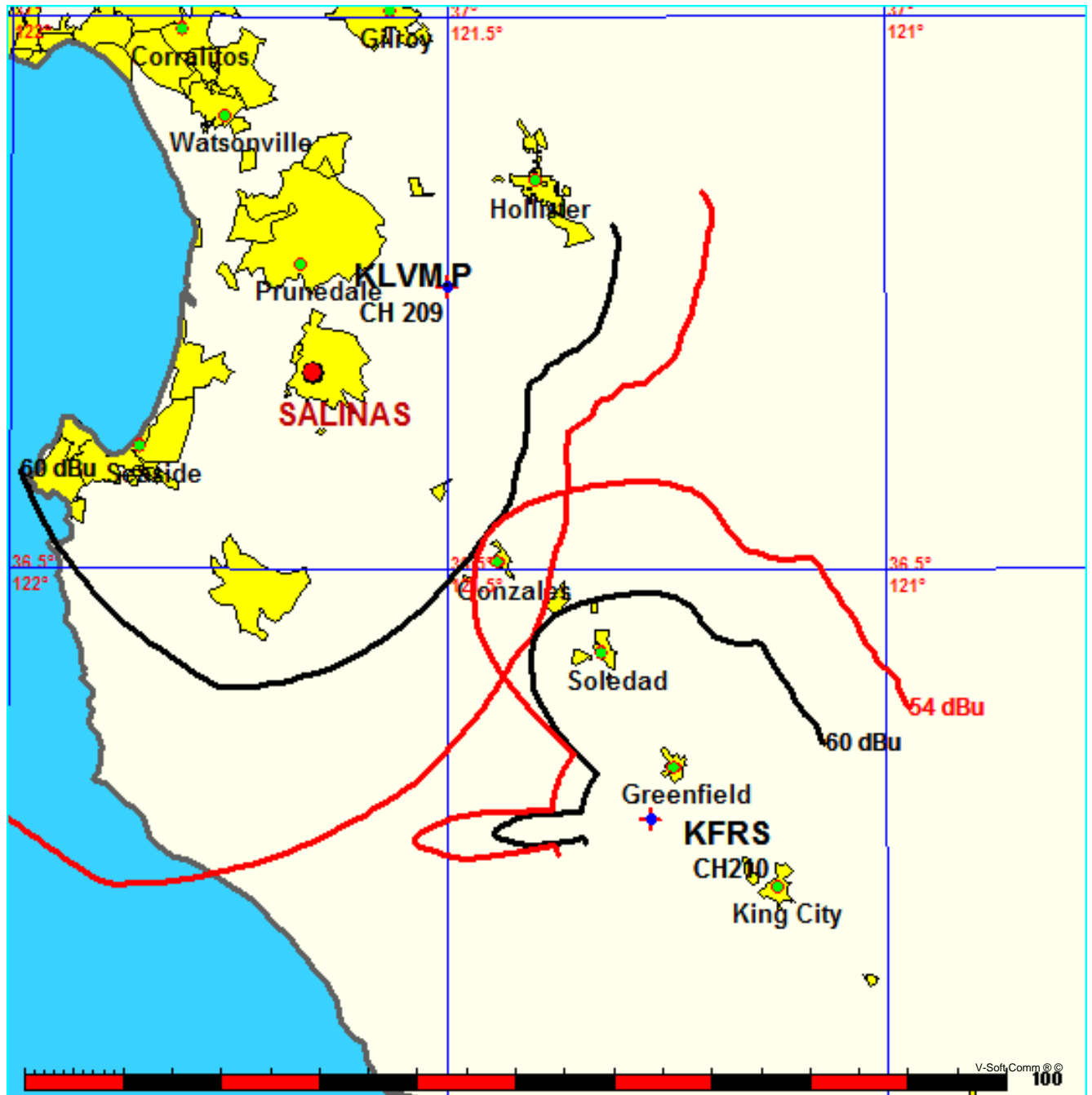


Exhibit 16-C

FMCommander Single Allocation Study - 10-27-2010 - NGDC 30 SEC
KLVM.P's Overlaps (In= 3.77 km, Out= 4.87 km)

KLVM.P CH 209 B DA
Lat= 36 45 22.0, Lng= 121 30 06.0
0.54 kW 715 M HAAT, 1013 M COR
Prot.= 60 dBu, Intef.= 54 dBu

KFRS CH 210 A BLED20020408ABB
Lat= 36 16 25.0, Lng= 121 16 12.0
0.25 kW 93 M HAAT, 386 M COR
Prot.= 60 dBu, Intef.= 54 dBu



KFRS vs. KLVM.P

10-27-2010 Terrain Data FMOver Analysis

KLVM. P

KFRS BLED20020408ABB

Channel = 209B
Max ERP = 0.54 kW
RCAMSL = 1013 M
N. Lat. 36 45 22.0
W. Lng. 121 30 06.0
Protected
60 dBu

Channel = 210A
Max ERP = 0.25 kW
RCAMSL = 386 M
N. Lat. 36 16 25.0
W. Lng. 121 16 12.0
Interfering
54 dBu

Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Actual (dBu)	I X (km)
155.0	000.0514	0437.7	018.3	340.7	000.2500	0304.9	039.2	51.54	
156.0	000.0536	0442.1	018.6	340.3	000.2500	0304.9	038.9	51.68	
157.0	000.0558	0448.1	018.9	339.8	000.2500	0304.9	038.5	51.84	
158.0	000.0581	0457.5	019.3	339.3	000.2500	0304.9	038.1	52.03	
159.0	000.0604	0469.5	019.8	338.8	000.2500	0304.9	037.7	52.24	
160.0	000.0628	0484.8	020.3	338.3	000.2500	0304.8	037.1	52.50	
161.0	000.0648	0502.3	020.9	337.7	000.2500	0304.5	036.5	52.77	
162.0	000.0668	0520.5	021.6	337.0	000.2500	0304.1	035.9	53.05	
163.0	000.0689	0537.6	022.2	336.3	000.2500	0303.5	035.4	53.30	
164.0	000.0710	0554.5	022.7	335.5	000.2500	0302.7	034.8	53.52	
165.0	000.0731	0568.8	023.2	334.7	000.2500	0301.6	034.4	53.69	
166.0	000.0753	0578.8	023.6	333.9	000.2500	0300.3	034.1	53.80	
167.0	000.0775	0585.1	023.9	333.2	000.2500	0298.7	033.9	53.85	
168.0	000.0797	0589.6	024.2	332.4	000.2500	0297.0	033.8	53.87	
169.0	000.0820	0594.4	024.5	331.5	000.2500	0294.9	033.6	53.88	
170.0	000.0843	0601.7	024.8	330.7	000.2500	0292.3	033.5	53.88	
171.0	000.0887	0609.0	025.2	329.7	000.2500	0288.7	033.2	53.91	
172.0	000.0932	0616.4	025.7	328.7	000.2500	0283.8	032.9	53.88	
173.0	000.0978	0626.8	026.2	327.6	000.2500	0277.4	032.7	53.82	
174.0	000.1026	0636.7	026.7	326.5	000.2500	0270.0	032.4	53.71	
175.0	000.1074	0647.2	027.2	325.3	000.2500	0261.1	032.2	53.53	
176.0	000.1124	0658.3	027.8	324.1	000.2500	0250.1	032.0	53.28	
177.0	000.1175	0668.3	028.3	322.9	000.2500	0237.5	031.8	52.94	
178.0	000.1227	0678.4	028.8	321.6	000.2500	0223.8	031.7	52.49	
179.0	000.1280	0689.2	029.3	320.3	000.2500	0209.5	031.6	51.97	
180.0	000.1334	0699.7	029.9	318.9	000.2500	0195.5	031.5	51.40	

KLVM.P vs. KFRS

10-27-2010 Terrain Data

KFRS BLED20020408ABB

KLVM.P

Channel = 210A
Max ERP = 0.25 kW
RCAMSL = 386 M
N. Lat. 36 16 25.0
W. Lng. 121 16 12.0
Protected
60 dBu

Channel = 209B
Max ERP = 0.54 kW
RCAMSL = 1013 M
N. Lat. 36 45 22.0
W. Lng. 121 30 06.0
Interfering
54 dBu

Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Azi muth (degrees)	ERP (kW)	HAAT (m)	Di st (km)	Actual (dBu)	I X (km)
320.0	000.2500	0206.7	018.8	167.6	000.0788	0587.9	040.1	52.71	
321.0	000.2500	0217.3	019.3	167.5	000.0785	0587.3	039.5	52.93	
322.0	000.2500	0228.3	019.8	167.3	000.0782	0586.7	038.9	53.14	
323.0	000.2500	0239.0	020.2	167.1	000.0778	0585.7	038.4	53.33	
324.0	000.2500	0249.3	020.6	166.9	000.0772	0584.5	037.8	53.50	
325.0	000.2500	0258.5	021.0	166.6	000.0766	0582.7	037.4	53.64	
326.0	000.2500	0266.6	021.3	166.2	000.0758	0580.5	036.9	53.74	
327.0	000.2500	0273.6	021.6	165.8	000.0749	0577.3	036.6	53.79	
328.0	000.2500	0279.9	021.8	165.4	000.0739	0573.0	036.2	53.81	
329.0	000.2500	0285.5	022.0	164.9	000.0729	0567.3	035.9	53.77	
330.0	000.2500	0289.9	022.2	164.4	000.0718	0560.0	035.7	53.69	
331.0	000.2500	0293.3	022.3	163.8	000.0706	0551.2	035.4	53.55	
332.0	000.2500	0296.1	022.4	163.2	000.0693	0541.2	035.3	53.37	
333.0	000.2500	0298.4	022.5	162.6	000.0681	0531.1	035.1	53.16	
334.0	000.2500	0300.3	022.6	162.0	000.0668	0520.4	035.0	52.94	
335.0	000.2500	0301.9	022.6	161.4	000.0655	0509.0	034.9	52.69	

Exhibit 16-D

FMCommander Single Allocation Study - 10-27-2010 - NGDC 30 SEC
KLVM.P's Overlaps (In= 9.73 km, Out= 1.55 km)

KLVM.P CH 209 B DA
Lat= 36 45 22.0, Lng= 121 30 06.0
0.54 kW 715 M HAAT, 1013 M COR
Prot.= 60 dBu, Intef.= 54 dBu

1213990 CH 208 A BNPED20071022ABX
Lat= 37 05 06.8, Lng= 121 36 01.0
0.14 kW -163 M HAAT, 93 M COR
Prot.= 60 dBu, Intef.= 54 dBu

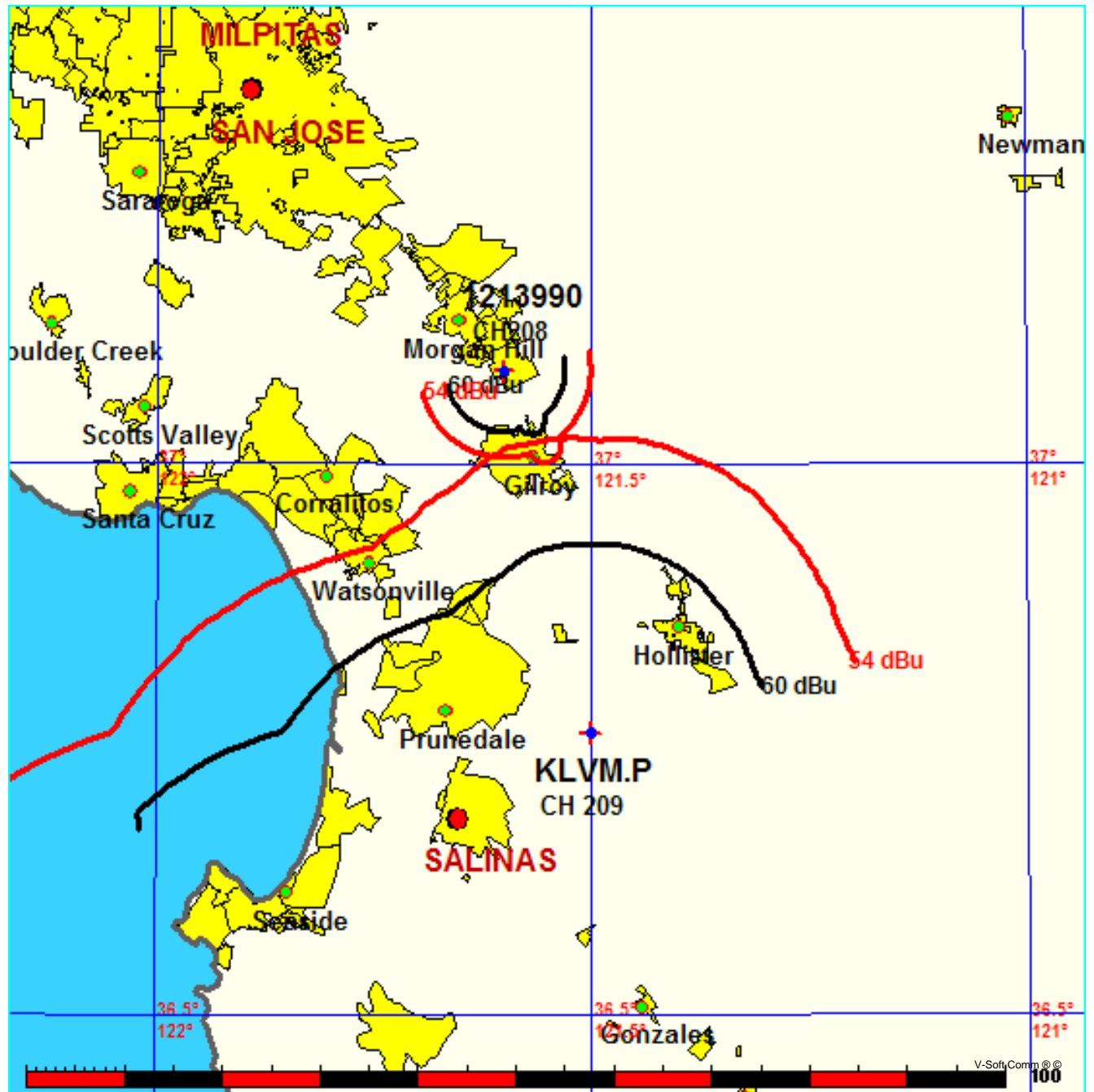


Exhibit 16-E

FMCommander Single Allocation Study - 10-27-2010 - NGDC 30 SEC
KLVM.P's Overlaps (In= 7.8 km, Out= 1.67 km)

KLVM.P CH 209 B DA
Lat= 36 45 22.0, Lng= 121 30 06.0
0.54 kW 715 M HAAT, 1013 M COR
Prot.= 60 dBu, Intef.= 54 dBu

1211359 CH 208 A BNPED20071018ABH
Lat= 37 07 37.6, Lng= 121 37 23.5
0.5 kW -1301 M HAAT, 133 M COR
Prot.= 60 dBu, Intef.= 54 dBu

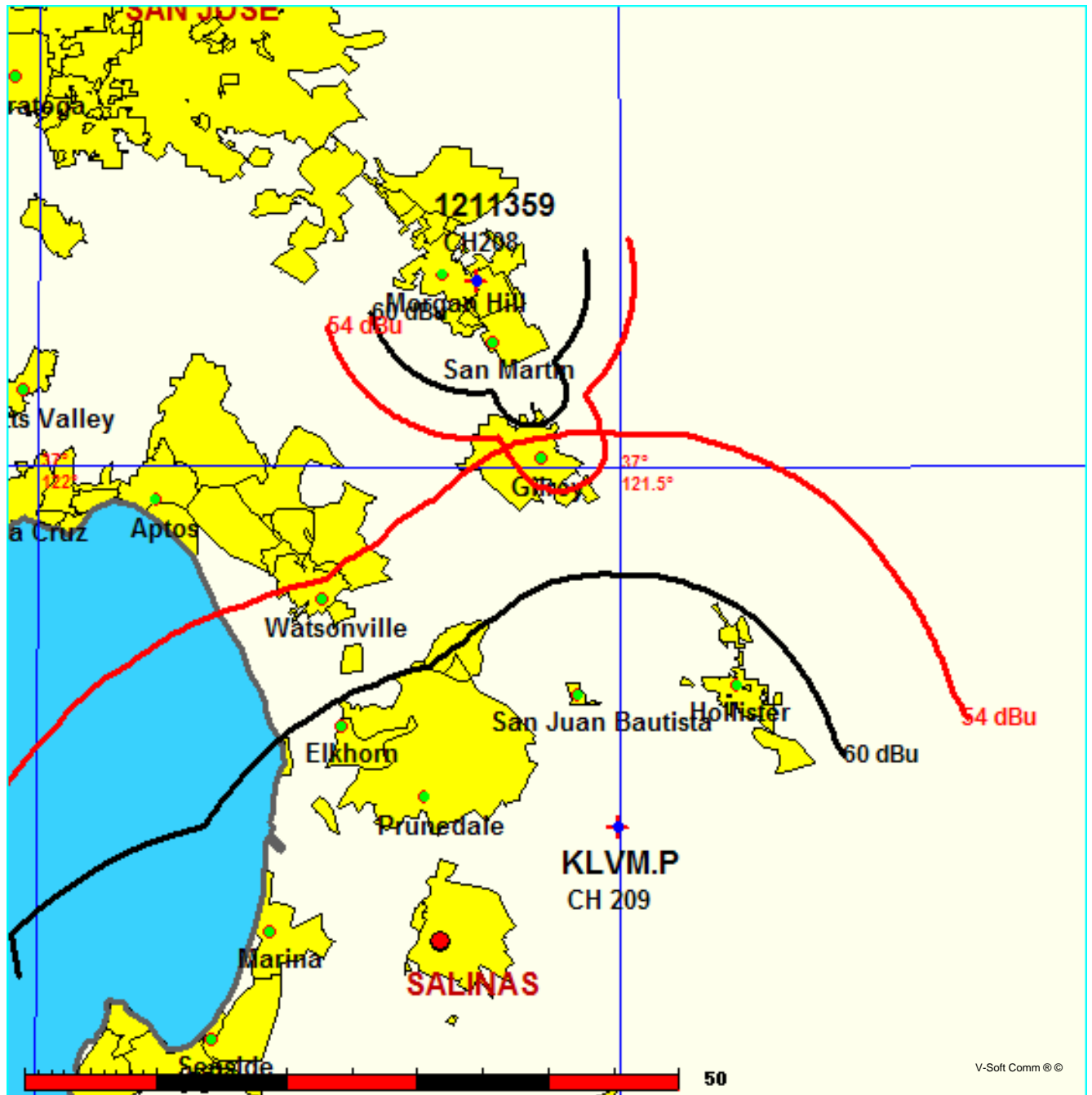


Exhibit 16-F

FMCommander Single Allocation Study - 10-27-2010 - NGDC 30 SEC
KLVM.P's Overlaps (In= 2.14 km, Out= 7.64 km)

KLVM.P CH 209 B DA
Lat= 36 45 22.0, Lng= 121 30 06.0
0.54 kW 715 M HAAT, 1013 M COR
Prot.= 60 dBu, Intef.= 54 dBu

NEW CH 208 B DA BNPED20071022BOJ
Lat= 36 59 54.0, Lng= 120 54 10.0
50.0 kW -20 M HAAT, 98 M COR
Prot.= 60 dBu, Intef.= 54 dBu

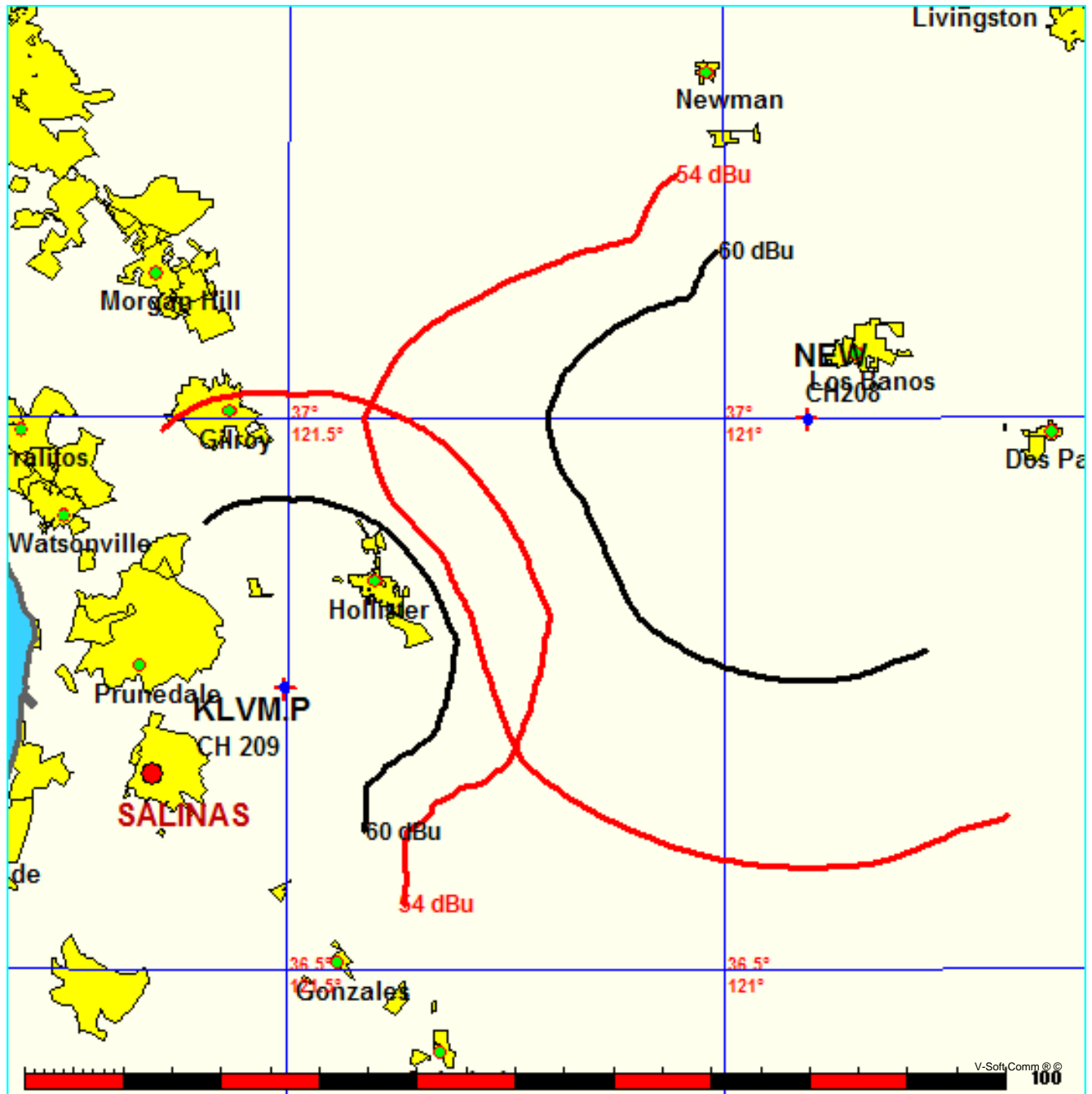
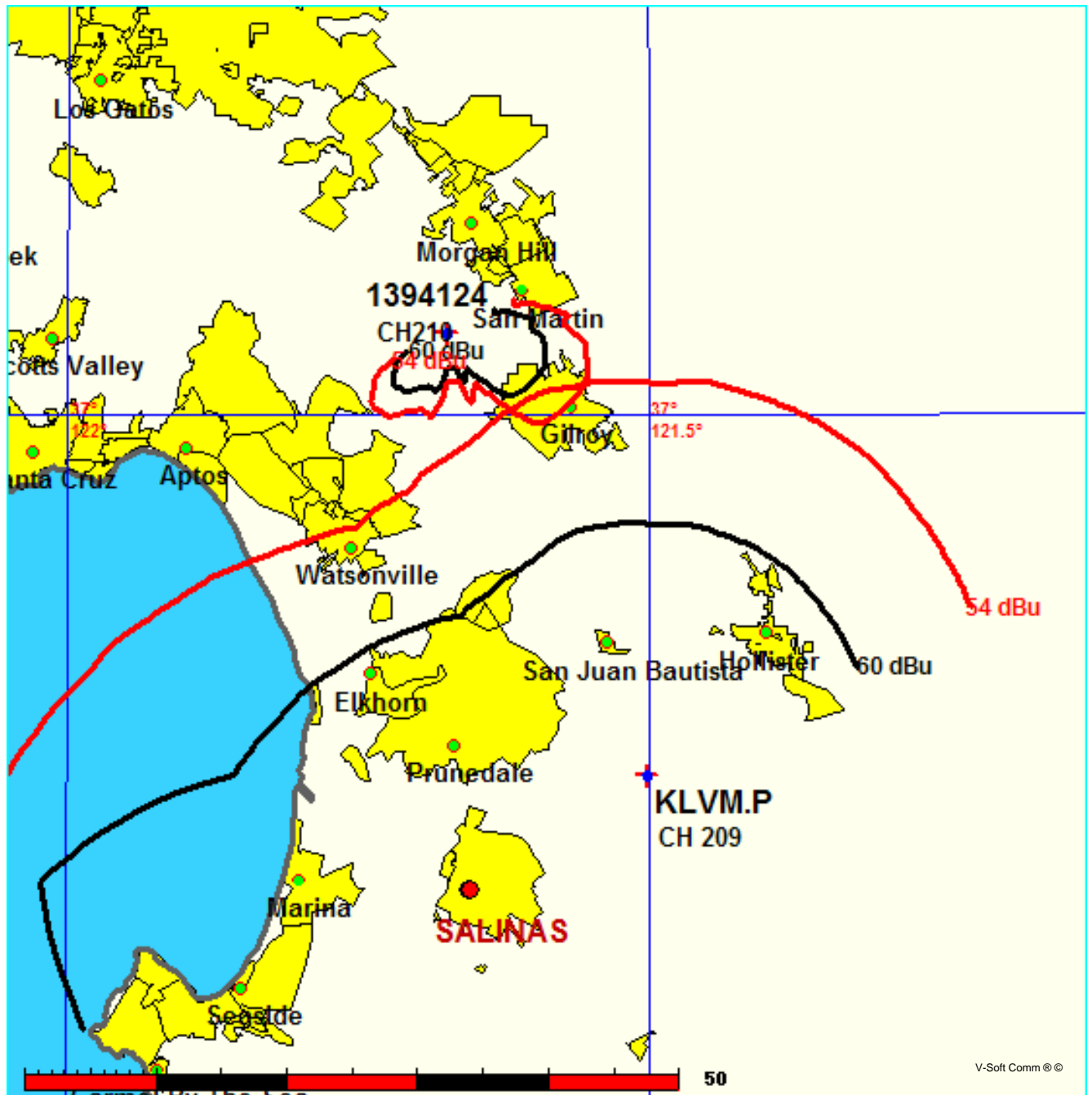


Exhibit 16-G

FMCommander Single Allocation Study - 10-27-2010 - NGDC 30 SEC
KLVM.P's Overlaps (In= 13.27 km, Out= 4.33 km)

KLVM.P CH 209 B DA
Lat= 36 45 22.0, Lng= 121 30 06.0
0.54 kW 715 M HAAT, 1013 M COR
Prot.= 60 dBu, Intef.= 54 dBu

1394124 CH 210 A DA BNPED20071022APW
Lat= 37 03 24.2, Lng= 121 40 25.5
0.145 kW 62 M HAAT, 301 M COR
Prot.= 60 dBu, Intef.= 54 dBu



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

Prunedale Educational Association ("PEA") desires to increase the power and service area of station KLVM, Prunedale, California. This proposal would minimally increase the amount of interference caused to, and would receive interference from, the following third-adjacent facility:

Facility ID	Status	Call Sign (or File #)	City of License
43591	Lic	KAZU	Pacific Grove, CA

1. Interference Caused

KLVM's current licensed F(50,10) 100 dBu interfering contour is entirely contained within the licensed F(50,50) 60 dBu protected contour of KAZU. The area of "overlap caused" covers approximately 1.6 square kilometers and no persons (see Exhibit 16-H1).

The proposed KLVM facility would increase this interference zone to 2.0 square kilometers and no persons (see Exhibit 16-H2). This increases the area from 0.05% to 0.06% of the KAZU protected 60 dBu.

2. Interference Recieved

KLVM's licensed protected contour receives overlap from KAZU. The area of "overlap received" from the above referenced facility is approximately: 24.7 square kilometers and 907 persons (see Exhibit 16-H3). This is 1.08% of the area and 0.24% of the population within the licensed KLVM 60 dBu.

KLVM's proposed protected contour would receive overlap from KAZU. The area of "overlap received" from the above referenced facility would be approximately: 24.7 square kilometers and 907 persons (see Exhibit 16-H4). This is 1.02% of the area and 0.24% of the population within the proposed KLVM 60 dBu.

The grant of this waiver request will allow KLVM to increase its overall coverage area by 144.3 square kilometers, an increase of 6.31%. It will provide new service to an estimated 493 persons, an increase of 0.13%. 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.

Significant service will be maintained and enhanced by the proposed expansion of KLVM, and the overlap areas are very small and well within the scope of the Commission's waiver policy. Clearly, this benefit heavily outweighs the potential for interference in an area that constitutes such a small portion of the station's proposed service area. Accordingly PEA respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

Exhibit 16-H1

KLVM

BLED20060822AJC
Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.45 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KAZU

BLED20040105AAN
Latitude: 36-33-09 N
Longitude: 121-47-17 W
ERP: 3.40 kW
Channel: 212
Frequency: 90.3 MHz
AMSL Height: 394.0 m
Elevation: 363.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

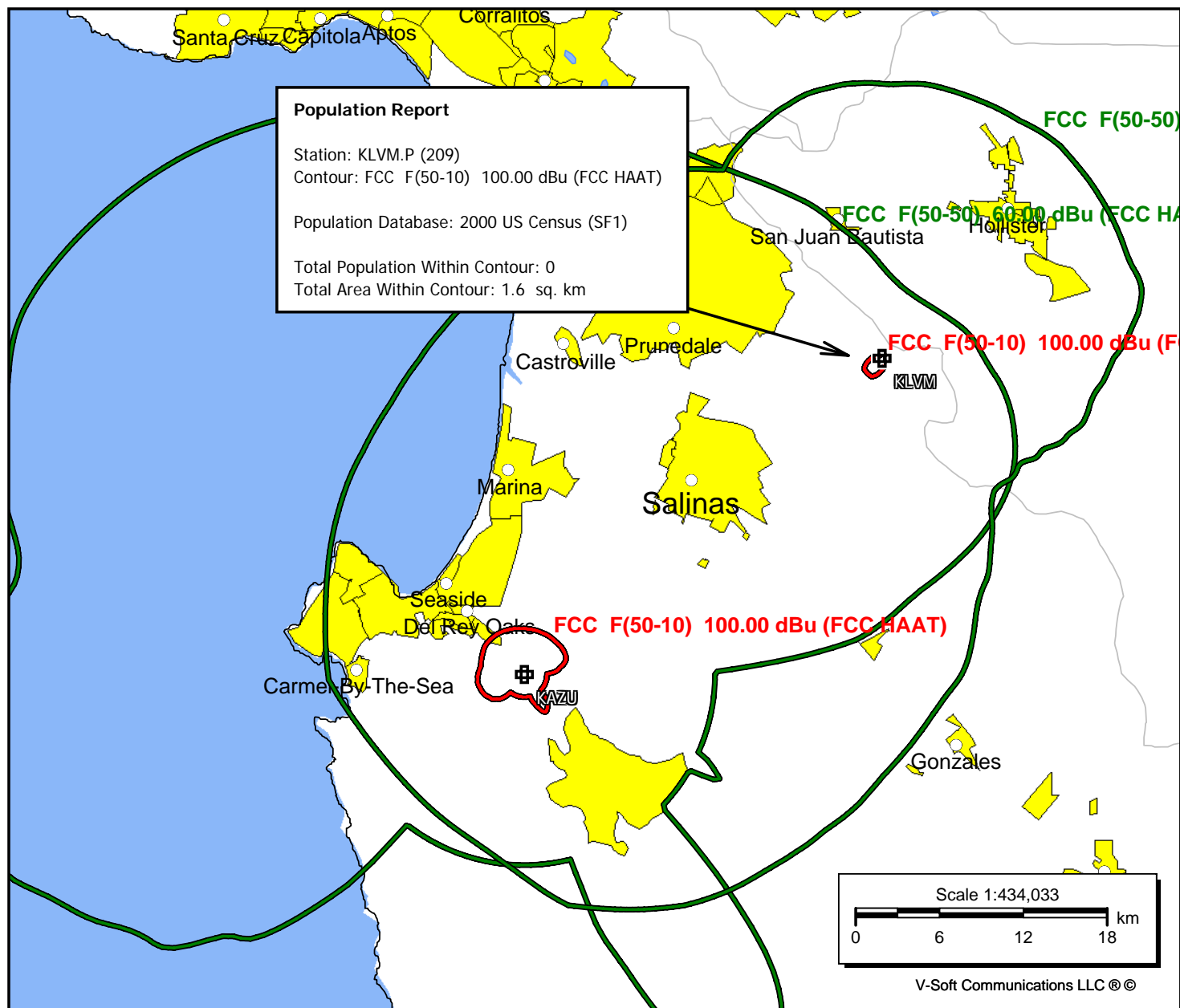


Exhibit 16-H2

KLVM

BLED20060822AJC
Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.45 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KAZU

BLED20040105AAN
Latitude: 36-33-09 N
Longitude: 121-47-17 W
ERP: 3.40 kW
Channel: 212
Frequency: 90.3 MHz
AMSL Height: 394.0 m
Elevation: 363.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

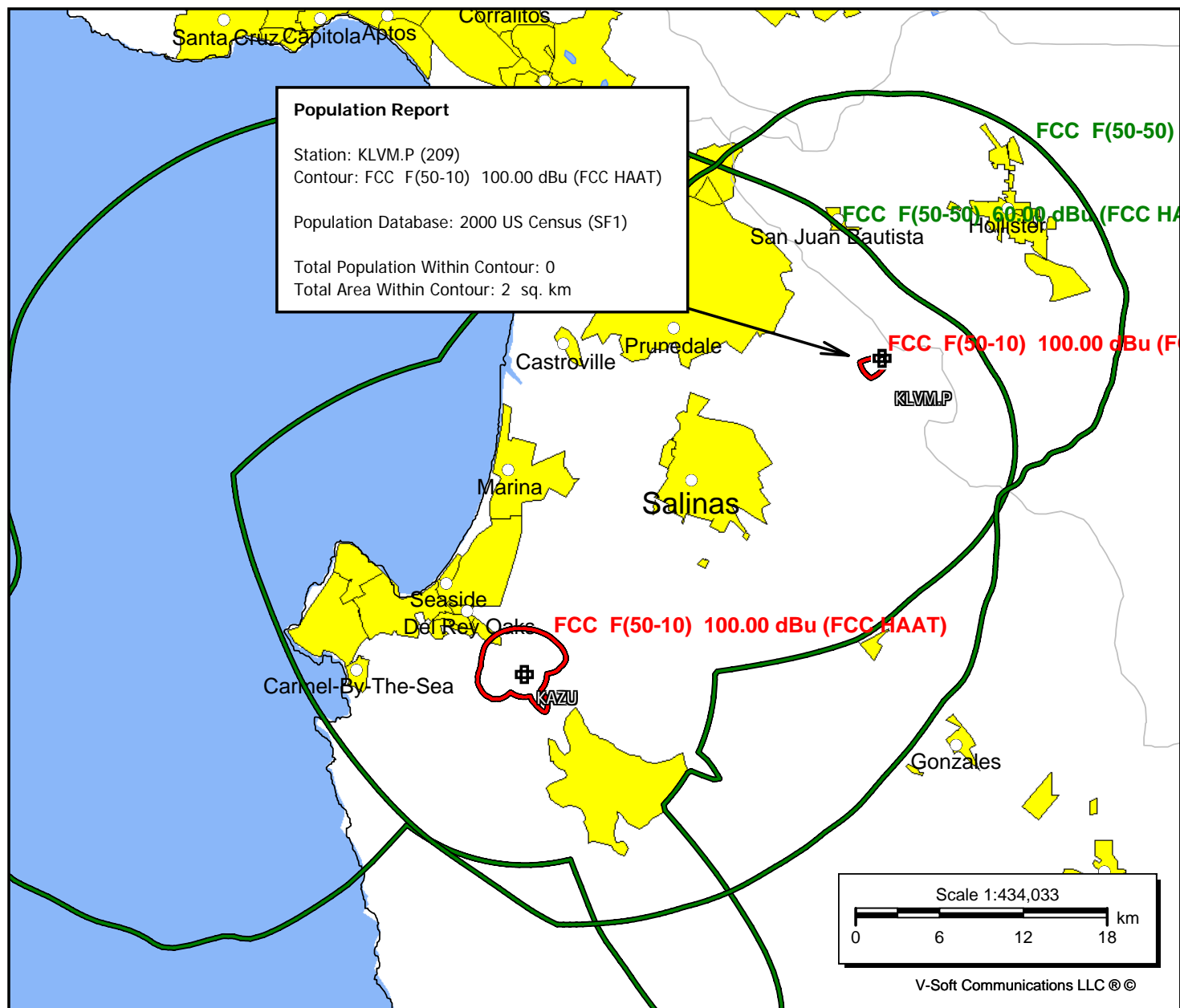


Exhibit 16-H3

KLVM

BLED20060822AJC
 Latitude: 36-45-22 N
 Longitude: 121-30-06 W
 ERP: 0.45 kW
 Channel: 209
 Frequency: 89.7 MHz
 AMSL Height: 1013.0 m
 Elevation: 935.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: No

KAZU

BLED20040105AAN
 Latitude: 36-33-09 N
 Longitude: 121-47-17 W
 ERP: 3.40 kW
 Channel: 212
 Frequency: 90.3 MHz
 AMSL Height: 394.0 m
 Elevation: 363.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No

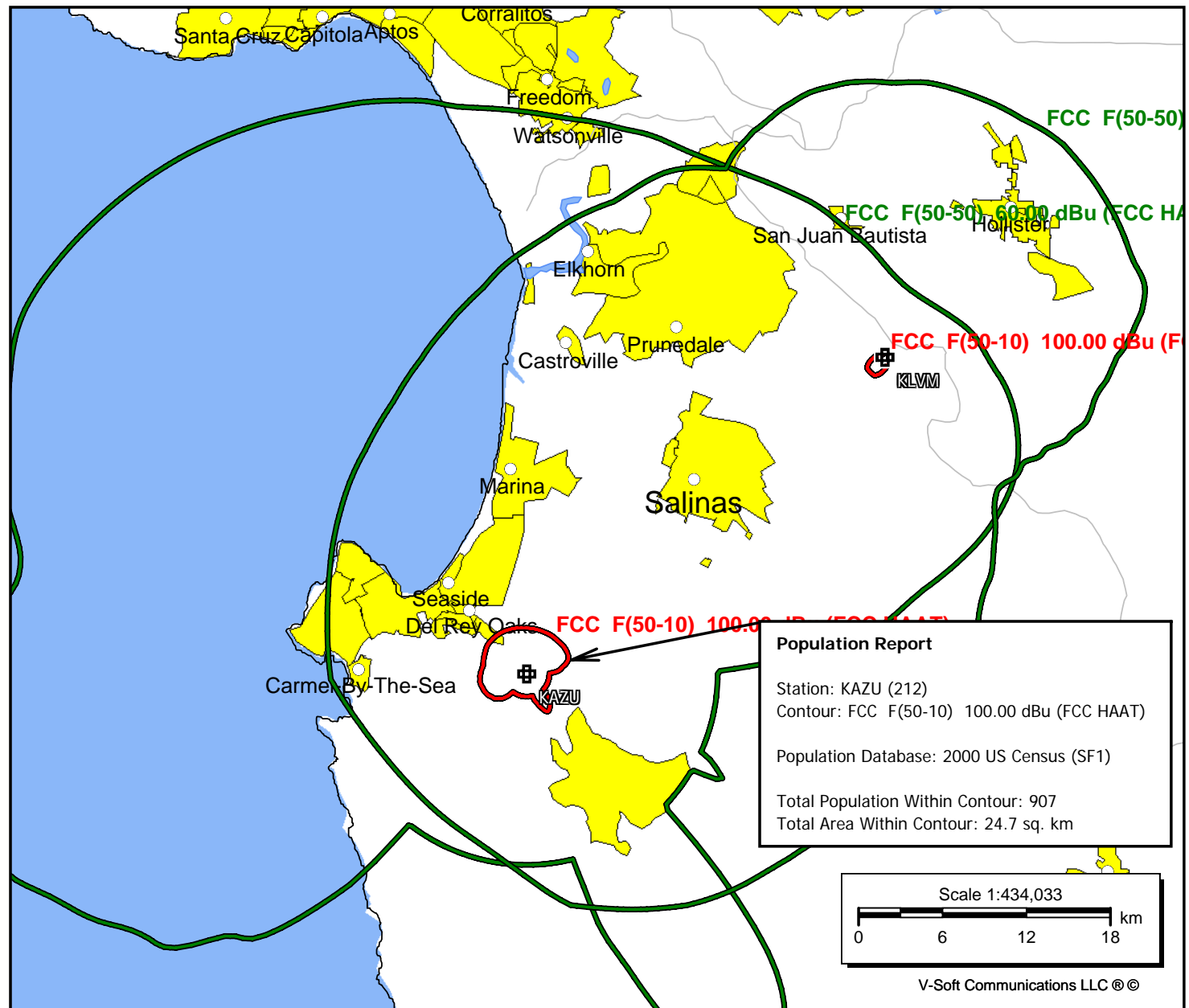


Exhibit 16-H4

KLVM

BLED20060822AJC
Latitude: 36-45-22 N
Longitude: 121-30-06 W
ERP: 0.45 kW
Channel: 209
Frequency: 89.7 MHz
AMSL Height: 1013.0 m
Elevation: 935.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

KAZU

BLED20040105AAN
Latitude: 36-33-09 N
Longitude: 121-47-17 W
ERP: 3.40 kW
Channel: 212
Frequency: 90.3 MHz
AMSL Height: 394.0 m
Elevation: 363.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

