

Exhibit B-16B

Section 73.213(a) Short-Spacing Analysis

The proposed operation of KOSO is 88 kilometers short-spaced to the licensed operation of first-adjacent-channel station KYCY 227B San Francisco. The licensed KOSO facility operates as a "pre-1964" grandfathered short-spaced station with respect to KYCY. The instant application proposes to increase the spacing to KYCY from the present 70 km to 81 km. A directional antenna is proposed to ensure that the proposed facility complies with §73.213(a)(2) of the Commission's Rules with respect to the areas and population subject to caused and received interference.

The attached allocation map exhibits (maps 1-4) depict the KOSO/KYCY licensed and proposed interference areas. These interference area calculations have been made using the contour ratio method described in §73.213(a)(1) of the Commission's Rules.

The following tables list the areas and population (1990 Census) subject to caused and received interference from the KOSO licensed and proposed facilities:

KOSO License	Population	Land Area
Interference caused to KYCY	47,053	627 km ²
Interference received from KYCY	29,866	981 km ²
Total	76,919	1,608 km ²

KOSO Proposed	Population	Land Area
Interference caused to KYCY	35,712	438 km ²
Interference received from KYCY	13,030	631 km ²
Total	48,742	1,069 km ²

These figures demonstrate that the proposed facility will result in:

- a) A decrease in the total area and population subject to first-adjacent-channel interference, caused and received, and;
- b) A decrease in the area and population subject to caused first-adjacent-channel interference.

New Caused Interference Area

As depicted on the attached map exhibit ("Allocation Study Map #5"), grant of the instant application will result in the creation of a new area subject to first-adjacent-channel interference within the KYCY 54 dBu F(50,50) contour. However, this area will be left with adequate aural service. The following stations provide protected service to 100% of the new area subject to caused interference:

KKUP	218B1	Cupertino
KSJO	222B	San Jose
KBAY	233B	Gilroy
KRTY	237A	Los Gatos
KSQQ	241A	Morgan Hill
KFFG	249A	Los Gatos
KUFX	253B	San Jose
KZOL	256B	Santa Cruz
KBRG	262B	San Jose
KARA	289B	Santa Clara
KEZR	293B	San Jose
KSTN	297B	Stockton

Several other stations provide service to all or part of the new area subject to caused interference. A list of those stations can be provided if the Commission so requires.

New Received Interference Area

As depicted on the attached map exhibit ("Allocation Study Map #6"), grant of the instant application will result in the creation of received interference in an area which is a) within the licensed KOSO interference-free limit, b) within the proposed KOSO 54 dBu contour, and c) outside the proposed KOSO interference-free limit. However, this area will be left with

adequate aural service. The following stations provide protected service to 100% of the new area subject to received interference:

KNBR	680 kHz	San Francisco	(Class A 0.5 mV/m)
KGO	810 kHz	San Francisco	(Class A 0.5 mV/m)
KFBK	1530 kHz	Sacramento	(Class A 0.5 mV/m)
KATM	277B	Modesto	
KHKK	281B	Modesto	
KSTN	297B	Stockton	

Several other stations provide service to all or part of the new area subject to received interference. A list of those stations can be provided if the Commission so requires.

Other Areas

Certain other areas are either a) within the licensed KOSO interference-free limit but outside the proposed KOSO 54 dBu contour, or b) within the proposed KOSO received interference area but outside the licensed KOSO 54 dBu contour. §73.213(a)(2) states, in part:

In all cases, the applicant must also show that any area predicted to lose service as a result of new co-channel or first-adjacent-channel interference has adequate aural service remaining.

This rule is not applicable to the areas described above. Case “a” describes areas where there is a loss of service due to differences in the average terrain values around the licensed KOSO site as compared with the average terrain values around the new KOSO site proposed in this minor change application. The loss of service in case “a” is not due to new interference. Case “b” describes “new” interference areas which do not presently receive service from KOSO. Thus, there is no actual loss of service in case “b”.

Conclusion

The preceding analysis demonstrates that the proposed facility is in full compliance with the provisions of §73.213(a)(2) with respect to first-adjacent-channel station KYCY.











