

## Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

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This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

It either or both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Channel Study																			
Proposed 266 Aspen																			
REFERENCE	CH#	266D	-	101.1	MHz,	Pwr=	0.045	kW,	HAAT=	0.0	M,	COR=	2877	M	DISPLAY DATES				
39 13 33 N						Average Protected	F(50-50)=	4.58	km						DATA 07-12-03				
106 50 00 W						Ave. F(50-10)	40	dBu=	14.6	54	dBu=	6.5	80	dBu=	1.6	100	dBu=	.5	SEARCH 07-12-03
CH	CALL	TYPE	STATE	AZI	DIST	LAT	Pwr(kW)	COR(M)	PRO(km)	*IN*	*OUT*								
CITY				<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap	in km)								
266D Aspen	AP266	APP DC	CO	0.0 180.0	0.00 BNPFT20030317BQP	39 13 33 106 50 00	0.002 25	25 6.7	2.2 Educational	-8.92*<	-8.98*<								
268C Eagle	RDEL	DEL CO		2.9 182.9	56.97	39 44 18 106 47 58	100.000 -2178	-2178 0.0	31.0	51.72	25.96								
268C Eagle	RDEL	DEL CO		2.9 182.9	56.97	39 44 18 106 47 58	100.000 -2178	-2178 0.0	31.0	51.72	25.96								
268C Eagle	KTUN	LIC CY	CO	2.9 182.9	56.97 BLH19840427D0	39 44 18 106 47 58	37.000 993	993 0.0	93.8 Salisbury	43.59	-36.82*<								
WAIIVER OF MINIMUM POWER GRANTED FOR CLASS C												Broadcasting Col							
269C1 Eagle	KTUN. A	APP ZCX	CO	2.9 182.9	56.97 BPH20020813ABK	39 44 18 106 47 58	11.800 993	993 0.0	81.2 Salisbury	47.97	-24.22*<								
269C1 Eagle	RADD	ADD CO		354.2 174.2	58.97	39 45 15 106 54 13	100.000 -2193	-2193 0.0	31.0	54.19	27.98								
269C1 Eagle	RADD	ADD CO		354.2 174.2	58.97	39 45 15 106 54 13	100.000 -2193	-2193 0.0	31.0	54.19	27.98								
266D Gypsum	AP266	APP DE	CO	343.1 163.1	50.89 BNPFT20030313APM	39 39 51 107 00 22	0.000 394	394 7.0	0.8 Educational	43.28	43.10								
269D Aspen	K269DS	LIC HN	CO	106.7 286.7	1.83 BLFT19890224TN	39 13 16 106 48 47	0.019 690	690 0.0	18.1 Pitkin County	-0.01<	-16.27*<								
TRANSLATOR FOR KVOD, DENVER, CO.												Translator D							
266C Denver	KOSI	LIC DC	CO	67.3 247.3	148.45 BLH20020118AAJ	39 43 45 105 14 06	25.283 -154	-154 5.3	22.7 Entercom	46.67	120.46								
263A El Jebel	ALLO	VAC CO		308.6 128.6	30.23 RM9699	39 23 42 107 06 29	6.000 -2259	-2259 0.1	15.8	22.89	14.41								
265C2 Gunnison	RADD	ADD CO		193.2 13.2	69.47	38 37 00 107 01 00	50.000 -2644	-2644 6.1	26.5	19.87	36.91								
265D Carbondale	K265CS	LIC DHN	CO	295.7 115.7	51.61 BLFT19890224TM	39 25 33 107 22 25	0.018 1011	1011 8.8	20.8 Pitkin County	12.69	21.96								
TRANSLATOR FOR KVOD, DENVER, CO.												Translator D							
265D Eagle	AP265	APP DC	CO	2.8 182.8	57.12 BNPFT20030313ANY	39 44 23 106 48 03	0.010 1017	1017 3.0	16.9 Educational	26.74	37.23								
266D Oak Creek	AP266	APP DC	CO	358.2 178.2	112.23 BNPFT20030317HFD	40 14 10 106 52 30	0.000 211	211 7.1	2.7 Educational	99.81	102.42								
266L1 Parachute	KSBP-L	CP CO		282.6 102.6	86.49 BNPL20010118AAV	39 23 27 107 48 48	0.100 -614	-614 27.1	5.6 Ksun Community	60.39	53.70								
267D Gunnison	K267AB	LIC DHN	CO	184.7 4.7	78.25 BLFT19940929TK	38 31 24 106 54 25	0.191 137	137 8.0	14.0 Woodland	51.35	56.19								
Translator For KKXK, Montrose, CO												Communications Co							
263D Gunnison	K210BS	APP C	CO	184.5 4.5	77.67 BPFT20020923AAI	38 31 42 106 54 15	0.044 94	94 0.3	8.1 Crested Butte	71.49	69.30								
264D Dillon	K264AG	CP CN	CO	56.5 236.5	78.79 BPFT19970310TE	39 36 50 106 04 02	0.250 -369	-369 0.1	7.1 The Lake Hill	75.91	71.63								
Translator for KRKM(FM), Kremmling, CO-												Translator G							
266D Steamboat Springs	AP266	APP C	CO	3.3 183.3	137.01 BNPFT20030317JUR	40 27 28 106 44 28	0.010 425	425 6.9	11.9 Edgewater	93.69	118.19								
264D Dillon	K264AG	LIC C	CO	56.3 236.3	81.31 BLFT20001122AAP	39 37 42 106 02 40	0.250 -338	-338 0.1	7.1 The Lake Hill	78.43	74.15								
												Translator G							

\*\*\*Affixed to 'IN' or 'Out' values = site inside protected contour.  
ERP and HAAT are on direct line to and from reference station. "<" = Contour Overlap

Terrain and Contour Study

N. Lat. = 39 13 33 W. Lng. = 106 50 00

HAAT and Distance to Contour - FCC Method - 03 Arc. Sec.

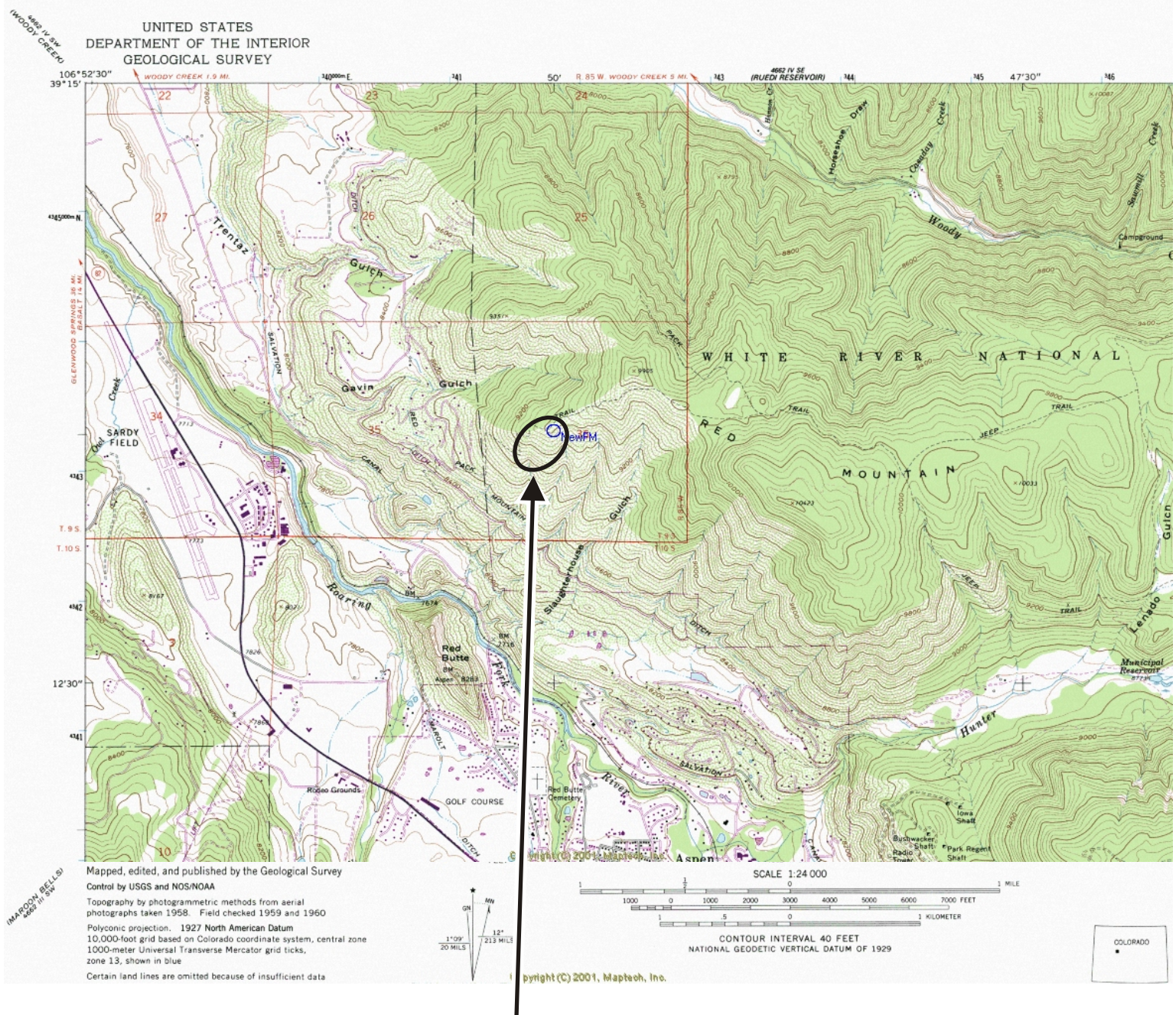
AP266 , Educational Communications Of, BNPFT20030317BQP

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	100-F1
000	2779.6	97.4	0.0002	-37.21	0.065	1.97	0.03
030	2977.5	-100.5	0.0009	-30.64	0.139	1.75	0.07
060	3163.8	-286.8	0.0009	-30.64	0.139	1.75	0.07
090	3278.2	-401.2	0.0002	-37.21	0.065	1.61	0.03
120	3286.4	-409.4	0.0004	-33.91	0.095	1.61	0.04
150	2665.8	211.2	0.0009	-30.58	0.139	4.20	0.07
180	2852.0	25.0	0.0094	-20.25	0.458	3.11	0.22
210	2631.4	245.6	0.0380	-14.21	0.919	12.69	0.43
240	3075.1	-198.1	0.0380	-14.21	0.919	4.38	0.43
270	2570.6	306.4	0.0094	-20.25	0.458	10.07	0.22
300	2370.3	506.7	0.0009	-30.58	0.139	5.47	0.07
330	2472.1	404.9	0.0004	-33.91	0.095	3.85	0.04

Ave El= 2843.57 M HAAT= 33.43 M AMSL= 2877 M

# EXHIBIT 12b

## Demonstration of No Population in 100 dBu Interference Contour



100 dBu  
Interference Contour  
Uninhabited/Unpopulated