TECHNICAL EXHIBIT
AMENDMENT TO
APPLICATION FOR FM CONSTRUCTION PERMIT
BPH-20050531ANM
FM STATION KOMA
FACILITY ID 72469
OKLAHOMA CITY, OKLAHOMA
CH 223C 100 KW 518 M

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an amendment to the pending application for construction permit to modify the licensed facilities of FM station KOMA at Oklahoma City, Oklahoma. Currently, KOMA is licensed (BMLH-19960329KD) to operate on channel 223C (92.5 MHz) with a nondirectional antenna maximum effective radiated power (ERP) of 100 kilowatts and an antenna radiation center eight above average terrain (HAAT) of 300 meters. The pending application (BPH-20050531ANM) proposes operation on channel 223C from a new transmitter site and with an ERP of 100 kW and an HAAT of 518 meters.

Background and Purpose of Instant Amendment Application

In response to a petition for rule making filed by Charles Crawford ("Crawford Petition") seeking to allot channel 228A to Wetumka, Oklahoma, which included the substitution of channel 224A for vacant channel 228A at Stuart, Oklahoma, the FCC issued an Order to Show Cause directed to KOMA to show cause why its facilities should not be reclassified to a Class C0 facility because its current HAAT (300 meters) was less than the Class C minimum (450 meters) with an ERP of 100 kW.[1]

In response to the Order to Show Cause, KOMA filed the pending application (BPH-20050531ANM) which proposes to relocate the KOMA transmitter site, increase the KOMA HAAT to 518 meters and maintain KOMA's Class C status.

This instant amendment application is being filed in response to the FCC's letter of July 22, 2005[2] to provide

[1] See Order to Show Cause in RM-10755, adopted October 13, 2004, released October 15, 2004.
[2] See Letter dated July 22, 2005 from George W. Gwinn, Supervisory Engineer, Audio Division, Media Bureau to Mark N. Lipp, Esq., Re: KOMA(FM); Oklahoma

information concerning the status of the registration of the antenna structure and to conform the overall tower height data to the FAA approved data. The FAA has issued a Determination of No Hazard to Air Navigation in Aeronautical Study No. 2005-ASW-3912-OE for the tower proposed to be used by KOMA. A copy the FAA Determination is attached as Figure 3. According to an agent of the tower proponent, the tower will be registered when the tower proponent closes on the tower which should occur in about 30 days. The FCC will be immediately notified of the antenna structure registration number upon receipt.

Response to Paragraph 14 – Community Coverage

Figure 1 is a map which demonstrates that KOMA's proposed operation complies with the provisions of Section 73.315. Specifically, it has been determined that the proposed 70 dBu contour will encompass 100% of the area within the Oklahoma City limits.

Response to Paragraph 16

Figure 2 is a separation study from KOMA's proposed antenna location for the channel 223C operation. As shown, the proposed antenna location complies with the minimum distance separation requirements of Section 73.207 for Class C operation on channel 223 towards all existing, authorized and proposed stations and allotments with the exception of the proposal to substitute channel 224A for vacant channel 228A at Stuart, Oklahoma included as part of the Crawford Petition. The Crawford Petition requested the downgrade of KOMA to Class C0 status. However, the instant KOMA amendment application will maintain KOMA's Class C status.

Environmental Considerations

The proposed KOMA facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, “Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation”. This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields.

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. Using a “conservative” vertical relative field value of 0.5, the total ERP of 200 kW (H+V) and an antenna center of radiation height above ground level of 521 meters, the calculated power density at 2 meters above ground level at the base of the tower is 0.0062 milliwatt per square centimeter (mW/cm^2), or 3.1% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.2 mW/cm^2 for FM frequencies). Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the tower will be restricted and appropriately marked with warning signs. Furthermore, as this will be a multi-user site, procedures will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such procedures include reducing the average exposure by spreading out the work over a longer period of time, wearing “accepted” RFR protective clothing and/or RFR exposure monitors or scheduling work when the station is at reduced power or shut down.

Finally, it is noted that this technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be provided to the FCC by the tower owner as part of the tower registration process.

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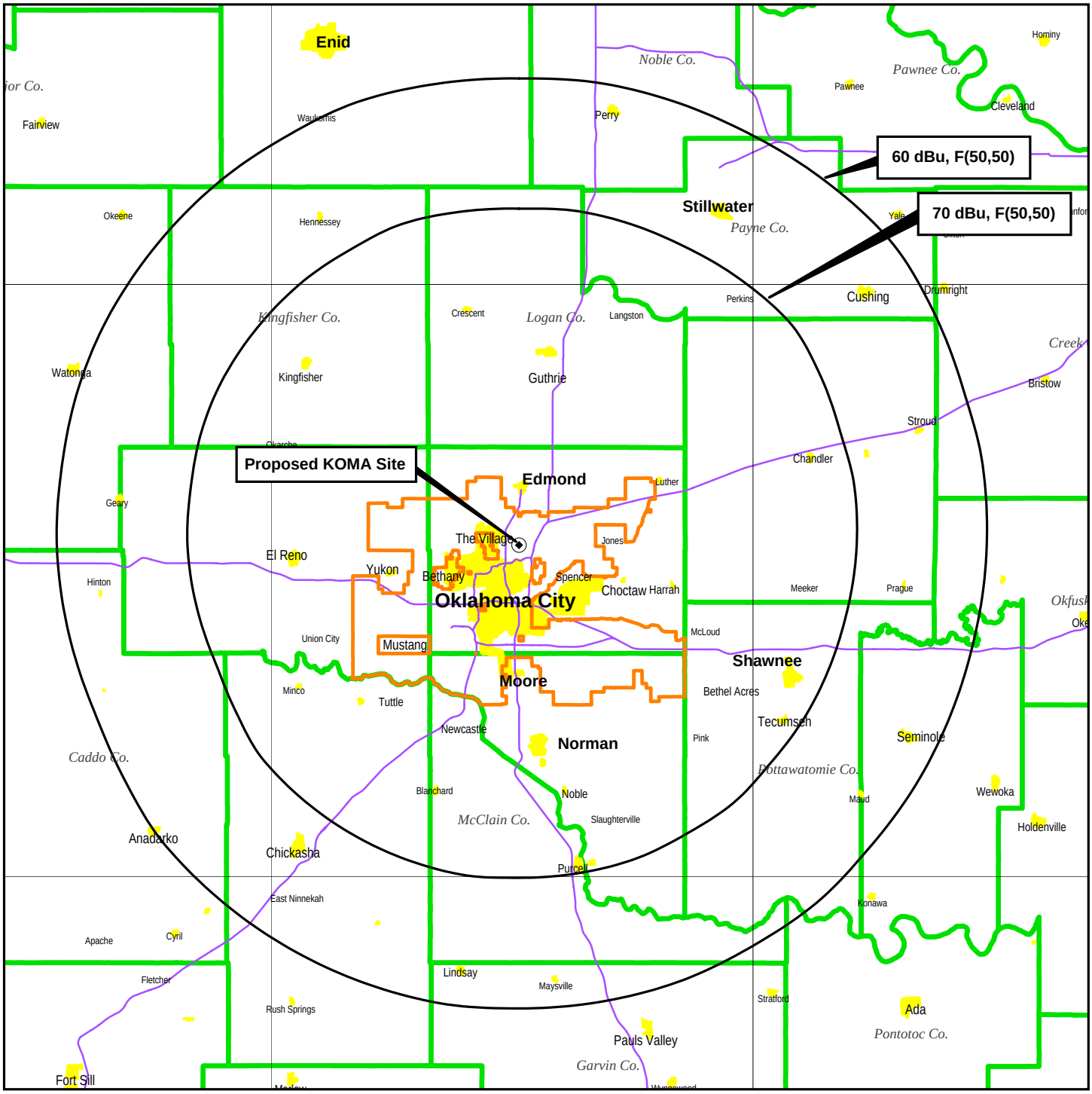
October 14, 2005



COMPLIANCE WITH SECTION 73.315

STATION KOMA
OKLAHOMA CITY, OKLAHOMA
CH 223C 100 KW 518 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CDBS FM SEPARATION STUDY

Job Title: Proposed KOMA, Ch. 223C, Oklahoma City, OK Separation Buffer: 32 km
Channel: 223 C Coordinates: 35-33-36 097-29-07

Call Id	City St Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude 73 Longitude 215	Bear	Dist. (km)	Req. (km) 215	207
KFXI	MARLOW	BLH	221 C1	100.000	N	34-42-35	N 208.7	107.46	99.0	105.0
3338	OK LIC C	20001220ABC	92.1	119		098-03-00		2.46	Close	
KFXI	MARLOW	BPH	221 C1	100.000	N	34-40-50	N 206.5	108.95	99.0	105.0
3338	OK APP C	20031003ABG	92.1	166		098-01-02		3.95	Close	
KFXI	MARLOW	BPH	221 C1	100.000	N	34-40-50	N 206.5	108.96	99.0	105.0
3338	OK APP C	20031003ABG	92.1	166		098-01-03		3.96	Close	
KOMA	OKLAHOMA CI	BPH	223 C	100.000	N	35-33-36	N 90.0	0.00		
72469	OK APP C	20050531ANM	92.5	518		097-29-07				
KOMA	OKLAHOMA CI	BMLH	223 C	100.000	N	35-32-52	N 202.1	1.47		
72469	OK LIC C	19960329KD	92.5	300		097-29-29				
	OKLAHOMA CI	RM	223 C0	0.000		35-32-52	202.1	1.47		
	OK ADD C	10755	92.5			097-29-29				
	OKLAHOMA CI	RM	223 C	0.000		35-32-52	202.1	1.47		
	OK DEL C	10755	92.5			097-29-29				
KKRE	HOLLIS	BLH	223 A	6.000	N	34-36-34	N 244.5	239.99	203.0	226.0
164095	OK LIC C	20050509ACC	92.5	100		099-50-57		13.99	Close	
KKRE	HOLLIS	BNPH	223 A	6.000	N	34-36-34	N 244.5	239.99	203.0	226.0
164095	OK CP C	20041221AAU	92.5	100		099-50-57		13.99	Close	
	HOLLIS		223 A	0.000	N	34-41-00	N 246.9	241.89	203.0	226.0
96741	OK VAC C		92.5			099-54-54		15.89	Close	
KSYN	JOPLIN	BPH	223 C0	100.000	N	37-05-49	Y 55.9	312.15	270.0	281.0
73244	MO CP C	20020528AAS	92.5	300		094-34-25		31.15	Clear	
	STUART	RM	224 A	0.000		34-48-23	122.4	154.82	142.0	165.0
	OK ADD C	10755	92.7			096-03-17		-10.18	**Short**[1]	
	LONE WOLF	RM	224 A	0.000		34-58-53	247.6	165.75	142.0	165.0
	OK VAC C	11025	92.7			099-09-53		0.75	Close	
	DICKSON	RM	224 A	0.000	N	34-07-17	N 163.8	166.14	142.0	165.0
	OK RSV C	9548	92.7			096-58-49		1.14	Close	
KTRX	DICKSON	BLH	224 A	5.500	N	34-06-56	N 164.5	166.23	142.0	165.0
88041	OK LIC C	20010502AAP	92.7	104		097-00-06		1.23	Close	
KANR	BELLE PLAIN	BLH	224 C3	12.000	N	37-20-08	N 0.5	197.03	165.0	176.0
15410	KS LIC C	19960313KA	92.7	143		097-27-53		21.03	Clear	

[1] A petition for rule making filed by Charles Crawford ("Crawford Petition") seeking to allot channel 228A to Wetumka, Oklahoma, included the substitution of channel 224A for vacant channel 228A at Stuart, Oklahoma. The Crawford Petition also requested the downgrade of KOMA to Class C0 status. However, the instant KOMA amendment application will maintain KOMA's Class C status.

Figure 3
Sheet 1 of 2

OE Case Data for ASN: 2005-ASW-3912-OE

Overview

Study (ASN): 2005-ASW-3912-OE
Prior Study: 1977-ASW-482-OE
Status: Determined
Letters: Determination

Received Date: 06/27/2005
Entered Date: 06/27/2005
Completion Date: 07/13/2005
Expiration Date:

Sponsor Information

Sponsor: Richland Towers
Attention Of: Tony Flores
Address: 4890 W. Kennedy Blvd., Suite 920
City: Tampa
State: FL
Postal Code: 33609
Country: USA
Phone: (813)490-2412
Fax: (813)286-4130

Sponsor's Representative Information

Representative:
Attention Of: Clair Billington
Address: 308 Oak Haven Dr.
City: Keller
State: TX
Postal Code: 76248
Country: US
Phone: (817)431-1736
Fax: (817)431-8762

Construction Info

Notice Of: Alteration
Duration: Permanent (Months: 0 Days: 0)
Work Schedule:
Date Built:

Structure Summary

Structure Type: Antenna Tower
Other Description:
NACO Number: 37-0855
FCC Number:

Structure Details

Latitude (NAD 83): 35° 33' 36.20" N
Longitude (NAD 83): 97° 29' 08.10" W
Datum: NAD 83
Accuracy:
Marking/Lighting: Red lights and paint
Other Description:
Name: OKC Site
City: Oklahoma City
State: OK
Nearest Airport: 2DT
Distance to Structure: 42,748.87 feet
On Airport: No
Direction to Structure: 19.30
Traverseway: NO
Description of Location: 4.8 NM Northeast of the BMC Heliport
Description of Proposal: Increase height of existing communications Tower (77-ASW-482-OE)

Height and Elevation

	Proposed	DNE	DET
Site Elevation:	1140		
Structure Height:	1809	0	0
Total Altitude from Mean Sea Level:	2949	0	0

Frequencies

Low Freq.	High Freq.	Unit	ERP	Unit
806	824	MHz	500	W
824	849	MHz	500	W
851	866	MHz	500	W
869	894	MHz	500	W
896	901	MHz	500	W
901	902	MHz	7	W
930	931	MHz	3500	W
931	932	MHz	3500	W
932	932.5	MHz	17	dBW
935	940	MHz	1000	W
940	941	MHz	3500	W
1850	1910	MHz	1640	W

Figure 3
Sheet 2 of 2

	1930	1990	MHz	1640	W
	2305	2310	MHz	2000	W
	2345	2360	MHz	2000	W