

Exhibit 30

Engineering Statement in Support of Change to the Community of License of KHRD

A. Introduction

This is a technical showing in support of the minor change proposal of the community of license from Weaverville, CA to Redding, CA, as well as the transmitter location, ERP and HAAT of station KHRD (Fac. ID 82720), Channel 276C2. This proposal is being concurrently filed with the minor change application of KNCQ (Fac. ID 40828), Channel 247C2, to change its community of license from Redding, CA to Weaverville, CA with no change in its currently licensed facilities. Applicant is licensee of both KHRD and KNCQ.

B. Background and Purpose

FM station KHRD is licensed as a Class C2 facility, operating at 0.6 kW ERP with an HAAT of 1,095 meters. The purpose of this statement is to demonstrate that under current FCC policy, KHRD could change its community of license to Redding. The proposed change in transmitter location, ERP and HAAT would provide city-grade coverage to the city of Redding. A concurrent application is being filed for KNCQ which is licensed as a Class C facility co-located with KHRD and operating with a power of 28 kW at an HAAT of 1,088 meters. The application of KNCQ is to change that station's community of license from Redding, CA to Weaverville, CA with no change in its transmitter location, ERP or HAAT.

C. Reference Coordinates for Redding

KHRD's current and proposed facilities are fully-spaced from all other stations in accordance with FCC Rules Section 73.207 except for a minor close spacing with KUKI-FM, Channel 277B (Fac. ID 31620) (BLH-20071030ABV) which is in compliance with Section 73.215. In recognition of this close spacing, Applicant submits new reference coordinates for a fully spaced allotment site for Channel 276C2 at Redding, CA of 40-43-54.9 N, 122-28-13.3 W (NAD 27).

Figure 1 below is a study showing all permitted licensed facilities and Construction Permits within 600 kHz and 320 km of the reference coordinates that are required to be considered under 73.207, including IF channels. Figure 2 is a map demonstrating compliance with 73.207 and community of license contour requirements.

D. Full City-Grade Coverage from Proposed Site and Request for 73.215 Processing

Applicant proposes to change transmitter location to coordinates 40-39-6.0 N, 122-31-32.0 W (NAD 27), ERP to 4.2 kW, and HAAT to 468 meters, which will create no new short spacings or prohibited overlaps that did not exist prior to the filing of this application. Figure 3-A is a study showing all facilities within 600 kHz and 320 km of the proposed site as required by 73.207, including IF channels. As noted in figure 3, the proposed site is close spaced to first adjacent channel station KUKI-FM by 8.7 km, which is an improvement of the currently permitted close spacing of 17.7 km. Applicant requests processing under Section 73.215 of the Rules.

The required spacings and contour overlaps that must be observed when requesting processing under 73.215 for a first adjacent channel in this instance are:

KUKI Chan 277B Protected Contour:	54 dBu F(50,50)
KHRD Interfering Contour:	48 dBu F(50,10)
KHRD Chan 277C2 Protected Contour:	60 dBu F(50,50)
KUKI Interfering Contour:	54 dBu F(50,10)
Required Full Spacing, 1 st adjacent channel, Class C2 to B:	169 km
Minimum 73.215 1 st adjacent channel, Class C2 to B:	145 km
Distance from KHRD proposed site to KUKI site:	160.29 km

These spacings and contours are illustrated in Figure 3-B. Since KUKI has never requested processing under 73.215, its protected and interfering contours are shown as a full facility for a Class B, which is 50 kW ERP at 150 m HAAT¹ at the licensed coordinates. The proposed KHRD site meets all requirements of 73.215.

The proposed facility will provide a city-grade contour, 70 dBu F(50,50), over 100% of the city of Redding as shown in Figure 4. Facilities at both the reference and proposed coordinates are mutually exclusive with the existing facility.

E. Section 307(b) Requirements

In the instructions for the new Form 301, the Commission describes several points that are minimally required for a showing that the proposed community of license change would result in a preferential arrangement of allotments under Section 307(b):

1. Areas and population²: The proposed facility will result in an increase in population covered by both the 60 dBu F(50,50) and 70 dBu F(50,50) contours as shown in Table 1. The population that gains coverage in both contours far outnumbers those who lose coverage by a ratio of approximately ten to one.

¹ KUKI-FM is licensed for 2.9 kW at 542 m HAAT.

² Population is based on US Census 2010.

	60 dBu Population	70 dBu Population
Existing Facility	184,373	144,733
Proposed Facility	209,776	166,883
Increase %	14%	15%
Increased pop	25,403	22,150
Population losing old service	2,816	3,600
Population losing old service %	1.5%	2.5%
Population gaining new service	28,219	25,750
Population gaining new service %	15.3%	24.9%

Table 1

It is important to note that the proposed change in contours follows the eastward movement of population in the region over the past several years. Most of the population coverage loss is in Trinity County to the west, while most of the coverage gain is in Shasta County to the east and in the city of Red Bluff in Tehama County to the southeast. In the decennial Census, the population of Trinity County increased from 13,022 in 2000 to 13,786 in 2010, a 5.9% increase, however the Census Department has estimated that between 2010 and 2013, the population of Trinity County has *decreased* by 2.5% to 13,488.³ The Shasta County Population increased from 163,256 in 2000 to 177,223 in 2010, an 8.6% increase, and then continued to increase another 1% to 178,980 by 2013.⁴ In the 23 years between 1990 and 2013, Trinity County grew only 2.9%, a total of 425 residents while Shasta County grew 21.7%, gaining 31,944 residents⁵.

The proposed 60 dBu contour will add new coverage to all of the population of the city of Red Bluff. Red Bluff's population increased 7% from 13,147 in 2000 to 14,076 in 2010⁶. The current population distribution in relation to the current and proposed 60 dBu contours is graphically illustrated in Figure 5.

Areas of coverage do not change substantially since both the existing and proposed facilities are Class C2. This is shown in Table 2.

	60 dBu area sq. km	70 dBu area sq. km
Existing Facility	8,377	2,959
Proposed Facility	7,918	3,122
Changed area %	-5%	+6%
Changed area km	-459	+163

Table 2

³ Source: US Census 1990, 2000 and 2010, and US Census *State and County QuickFacts*, May 31, 2014

⁴ *Ibid*

⁵ *Ibid*

⁶ US Census 2000, 2010

2. Number of remaining local transmission services: A concurrent application has been filed that will change the community of license of station KNCQ from Redding to Weaverville, which will result in the number of stations licensed to Weaverville remaining at one.
3. Remaining stations providing service to community: The number of stations that will continue to provide protected service to Weaverville is approximately 9, which qualifies as abundant radio service for a community its size with a 2010 population of 3,600. Redding will continue to be served by 5 AM stations and 18 FM stations that have facilities or Construction Permits with protected contours over 100% of the population and area of the city. These stations are summarized in Figure 6-A and illustrated in Figure 6-B.

The proposed minor modification does not create any new white or grey areas. Commission policy disfavors any change that would result in the net loss of a third, fourth or fifth reception service to more than 15% of the population in the station's current protected contour⁷. This proposal meets that qualification as demonstrated in Figure 7. The only area that will be left with only four reception services is a small, unpopulated triangle, 24 square km in area, approximately 12 km from north to south and 4 km wide of extremely rough, mountainous terrain that is shown in a close-up aerial view in Figure 8. As can be seen, there are no roads, homes or structures within the triangle. Therefore, it can be stated with confidence that *no* population will lose its third, fourth or fifth reception service as a result of the proposed minor modification of KHRD.

4. The population of the proposed community of license, Redding, CA is 92,328.⁸
5. The proposed city is a licensable community: This is demonstrated by the fact that there are currently five AM and five FM stations licensed to Redding. The city was incorporated in 1887, is the county seat and largest community of Shasta County, has three high schools, six middle schools, 46 elementary schools, six charter schools, 30 private schools and five colleges and universities⁹. The city is served by a daily newspaper, *The Redding Record Searchlight*, and in 2007, the city opened a 55,000 square foot, two story library building¹⁰. Redding has two large hospitals that employ a combined total of 1,100 people¹¹.

⁷ *Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rule Making*. MB Docket No. 09-52. FCC 11-28

⁸ "2010 Census Interactive Population Search: CA - Redding city". U.S. Census Bureau. Retrieved July 12, 2014.

⁹ Wikipedia "Redding, California"

¹⁰ *Ibid*

¹¹ *Ibid*

F. Preferential Arrangement of Allotments Under Section 307(b)

In 2000, Weaverville became a Census Designated Place, and the permitted transmitter location, ERP and HAAT of existing station KHRD rendered 70 dBu coverage to 82% the population that was believed to represent the community in 1998 when the Construction Permit was granted¹². KHRD now covers only about 25% of the area of the CDP and while grandfathered under its existing license, no longer meets the requirements of 73.315. The concurrently filed application of KNCQ for a change in its community of license, when combined cumulatively with this application, will result in the first City Grade coverage of 100% of the population and area of the Weaverville CDP which arguably qualifies as a First Local Service (Priority 3)¹³, thus creating a preferential arrangement of allotments under Section 307(b), and will allow the ‘repurposing’ of KHRD to better serve the continuous and rapid eastward-moving expansion of the regional population. This is demonstrated in Figure 9. Additionally, the proposed transmitter location reduces an existing close spacing with first adjacent channel station KUKI-FM from 17.7 km to 8.7 km.

¹² Weaverville is an unincorporated community, and as such has no recorded city borders. In the year 2000, the U.S. Census Bureau declared Weaverville to be a Census Designated Place (CDP) and for the purpose of this application, the CDP boundaries are used to define Weaverville’s borders.

¹³ The FM allotment priorities are: (1) First full-time aural service; (2) Second full-time aural service; (3) First local service; and (4) Other public interest matters. Co-equal weight is given to Priorities (2) and (3). See Revision of FM Assignment Policies and Procedures, Second Report and Order, 90 FCC 2d 88 (1982), recon. denied, Memorandum Opinion and Order, 56 RR 2d 448 (1983)

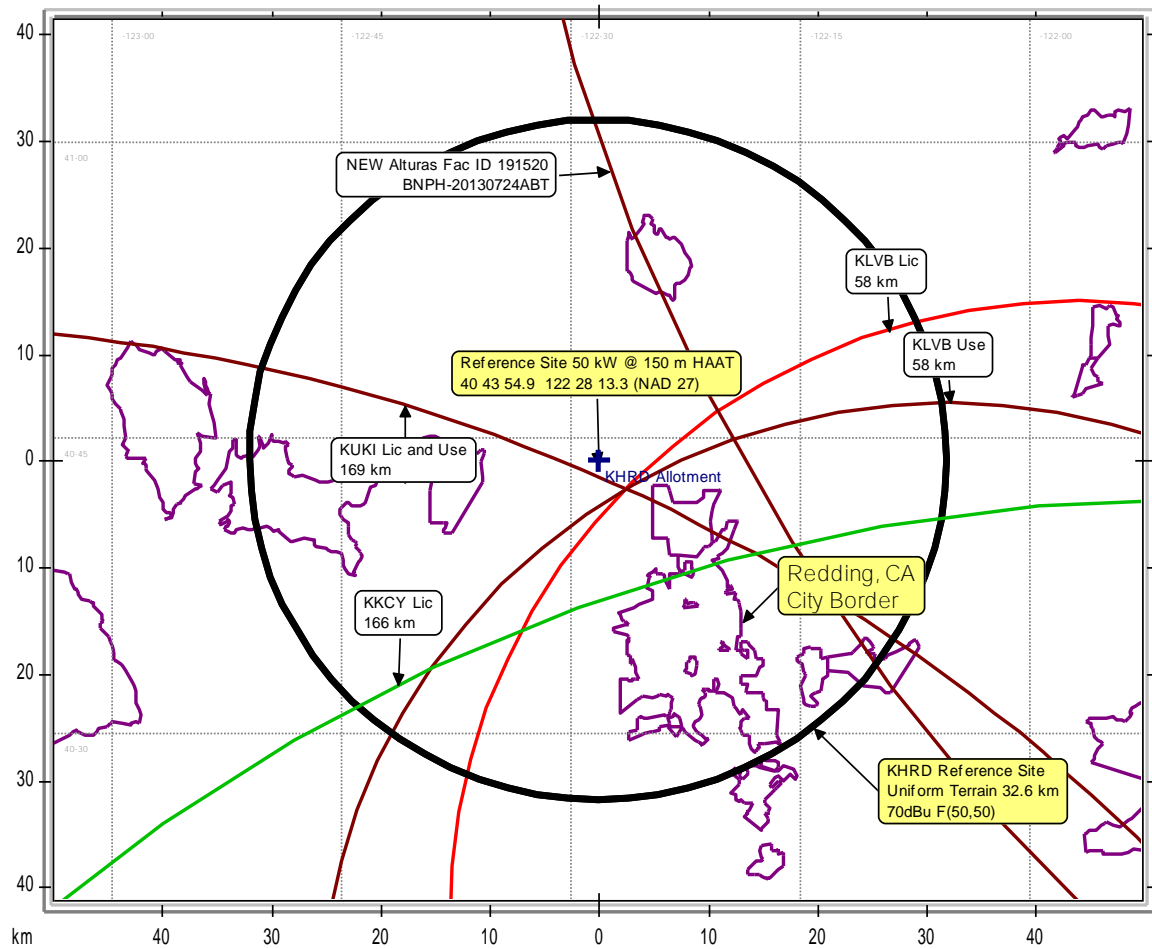
Figure 1

Separation Study for KHRD Allotment Coordinates for Redding, CA
ComStudy 2.2 search of Channel 276C2 at 40-43-54.9 N, 122-28-13.3 W (NAD 27)

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
KWRZ	OR	CANYONVILLE	92.3	222	850.0	C3	LIC	262.84	17.00	245.8
KRED	CA	EUREKA	92.3	222	25000.0	C1	LIC	126.99	27.00	100.0
KBEB	CA	SACRAMENTO	92.5	223	50000.0	B	LIC	240.43	20.00	220.4
KLAD-FM	OR	KLAMATH FALLS	92.5	223	63000.0	C	LIC	167.01	35.00	132.0
	CA	RIO DELL	102.5	273	0.0	C2	RSV	155.78	58.00	97.8
KSFM	CA	WOODLAND	102.5	273	500.0	B	LIC	246.38	74.00	172.4
KSFM	CA	WOODLAND	102.5	273	16000.0	B	LIC	246.38	74.00	172.4
KSFM	CA	WOODLAND	102.5	273	50000.0	B	LIC	246.38	74.00	172.4
KWVF	CA	GUERNEVILLE	102.7	274	1600.0	A	LIC	253.65	55.00	198.7
KKRO	CA	RED BLUFF	102.7	274	5500.0	C2	LIC	61.78	58.00	3.8
KCNA	OR	CAVE JUNCTION	102.7	274	100000.0	C	LIC	196.51	105.00	91.5
KYSF	OR	BONANZA	102.9	275	460.0	C3	LIC	166.98	117.00	50.0
KWYL	CA	SOUTH LAKE TAHOE	102.9	275	7200.0	C	LIC	287.28	188.00	99.3
KWYL	CA	SOUTH LAKE TAHOE	102.9	275	39000.0	C	LIC	271.43	188.00	83.4
KRSB-FM	OR	ROSEBURG	103.1	276	0.0	C2	RSV	295.44	190.00	105.4
KKCY	CA	COLUSA	103.1	276	135.0	A	LIC	178.33	166.00	12.3
KHRD*	CA	WEAVERVILLE	103.1	276	600.0	C2	LIC	20.85	190.00	-169.1
KHRD*	CA	WEAVERVILLE	103.1	276	700.0	C2	LIC	10.06	190.00	-179.9
KHRD*	CA	WEAVERVILLE	103.1	276	700.0	C2	LIC	10.06	190.00	-179.9
KRSB-FM	OR	ROSEBURG	103.1	276	2750.0	A	LIC	284.66	166.00	118.7
KBAA	CA	GRASS VALLEY	103.3	277	530.0	A	LIC	209.15	106.00	103.2
KUKI-FM	CA	UKIAH	103.3	277	2900.0	B	LIC	170.32	169.00	1.3
KHSM	CA	MCKINLEYVILLE	103.3	277	3100.0	C3	CP MOD	145.31	117.00	28.3
NEW	CA	ALTURAS	103.3	277	60000.0	C	CP	204.98	188.00	17.0
KHSL-FM	CA	PARADISE	103.5	278	1500.0	B1	LIC	107.32	56.00	51.3
KHHM	CA	SACRAMENTO	103.5	278	6000.0	A	LIC	255.02	55.00	200.0
KLDZ	OR	MEDFORD	103.5	278	100000.0	C1	LIC	178.36	79.00	99.4
KLVG	CA	GARBERVILLE	103.7	279	0.0	C0	RSV	155.17	89.00	66.2
KODS	CA	CARNELIAN BAY	103.7	279	5900.0	C1	LIC	271.43	79.00	192.4
KLVG	CA	GARBERVILLE	103.7	279	11000.0	C0	LIC	145.67	89.00	56.7

* KHRD currently licensed facilities.

Allotment Coordinates for KHRD, C2, CH 276, Redding, CA



Site is fully spaced and renders City Grade coverage to 100% of Redding.

State Borders City Borders Lat/Lon Grid

Map Scale: 1:578792 1 cm = 5.79 km V/H Size: 82.64 x 99.72 km

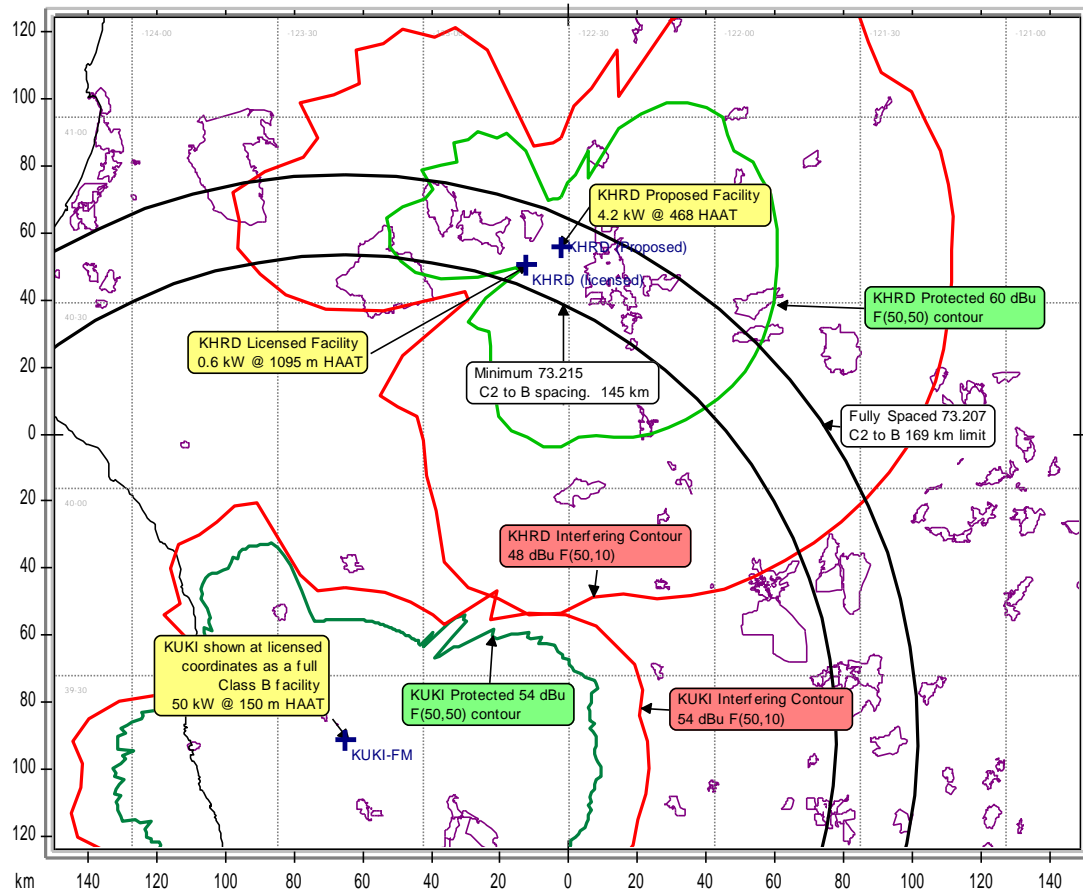
Figure 3-A
Separation Study for KHRD Proposed Transmitter Site, Redding, CA
ComStudy 2.2 search of channel 276 (103.1 MHz Class C2) at 40-39-6.0 N, 122-31-32.0 W.

Callsign		City	Freq	Chan	ERP_w	Class	Status	Actual Sep km	Reqrd Sep km	Clear km	
KRED	State	EUREKA	92.3	222	25000	C1	LIC	122.69	27	95.7	
KBEB	CA	SACRAMENTO	92.5	223	50000	B	LIC	233.92	20	213.9	
KLAD-FM	CA	KLAMATH FALLS	92.5	223	63000	C	LIC	177.06	35	142.1	
KSFM	CA	WOODLAND	102.5	273	500	B	LIC	239.11	74	165.1	
KSFM	CA	WOODLAND	102.5	273	16000	B	LIC	239.11	74	165.1	
KSFM	CA	WOODLAND	102.5	273	50000	B	LIC	239.11	74	165.1	
KWVF	CA	GUERNEVILLE	102.7	274	1600	A	LIC	244.02	55	189	
KKRO	CA	RED BLUFF	102.7	274	5500	C2	LIC	59.75	58	1.7	
KCNA	CA	CAVE JUNCTION	102.7	274	100000	C	LIC	202.07	105	97.1	
KYSF	OR	BONANZA	102.9	275	460	C3	LIC	177.02	117	60	
KWYL	OR	SOUTH LAKE TAHOE	102.9	275	7200	C	LIC	286.37	188	98.4	
KWYL	CA	SOUTH LAKE TAHOE	102.9	275	39000	C	LIC	270.37	188	82.4	
KRSB-FMCA		ROSEBURG	103.1	276	0	C2	RSV	302.47	190	112.5	
KKCY	OR	COLUSA	103.1	276	135	A	LIC	171.5	166	5.5	
KHRD*	CA	WEAVERVILLE	103.1	276	600	C2	LIC	11.8	190	-178.2	
KHRD*	CA	WEAVERVILLE	103.1	276	700	C2	LIC	0	190	-190	
KHRD*	CA	WEAVERVILLE	103.1	276	700	C2	LIC	0	190	-190	
KRSB-FMCA		ROSEBURG	103.1	276	2750	A	LIC	292.16	166	126.2	
KBAA	OR	GRASS VALLEY	103.3	277	530	A	LIC	205.28	106	99.3	
KUKI-FM	CA	UKIAH	103.3	277	2900	B	LIC	160.29	169	-8.7	Close**
KHSM	CA	MCKINLEYVILLE	103.3	277	3100	C3	CP MOD	143.77	117	26.8	
NEW	CA	ALTURAS	103.3	277	60000	C	CP	213.24	188	25.2	
KHSL-FMCA		PARADISE	103.5	278	1500	B1	LIC	103.42	56	47.4	
KHHM	CA	SACRAMENTO	103.5	278	6000	A	LIC	248.33	55	193.3	
KLDZ	CA	MEDFORD	103.5	278	100000	C1	LIC	185.97	79	107	
KLVG	OR	GARBERVILLE	103.7	279	0	C0	RSV	148.21	89	59.2	
KODS	CA	CARNELIAN BAY	103.7	279	5900	C1	LIC	270.37	79	191.4	
KLVG	CA	GARBERVILLE	103.7	279	11000	C0	LIC	138.77	89	49.8	

* Currently licensed facility

** See Figure 3-B

Spacings and contours for 73.215. Protected contours are green, interfering contours are red

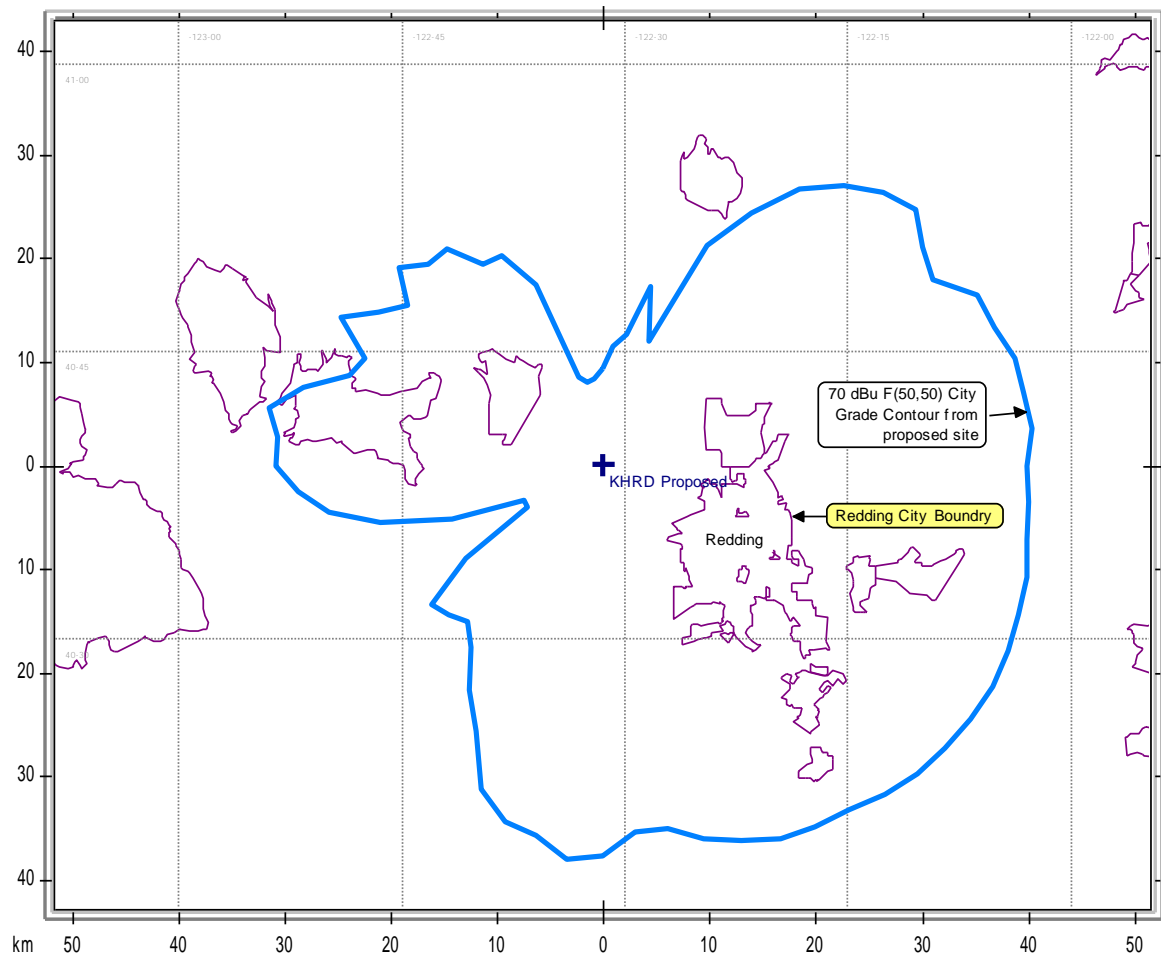


The proposed KHRD facility qualifies for processing under 73.215

State Borders City Borders Lat/Lon Grid

Map Scale: 1:1733952 1 cm = 17.34 km V/H Size: 247.80 x 298.73 km

City Grade Contour of Proposed KHRD Facility

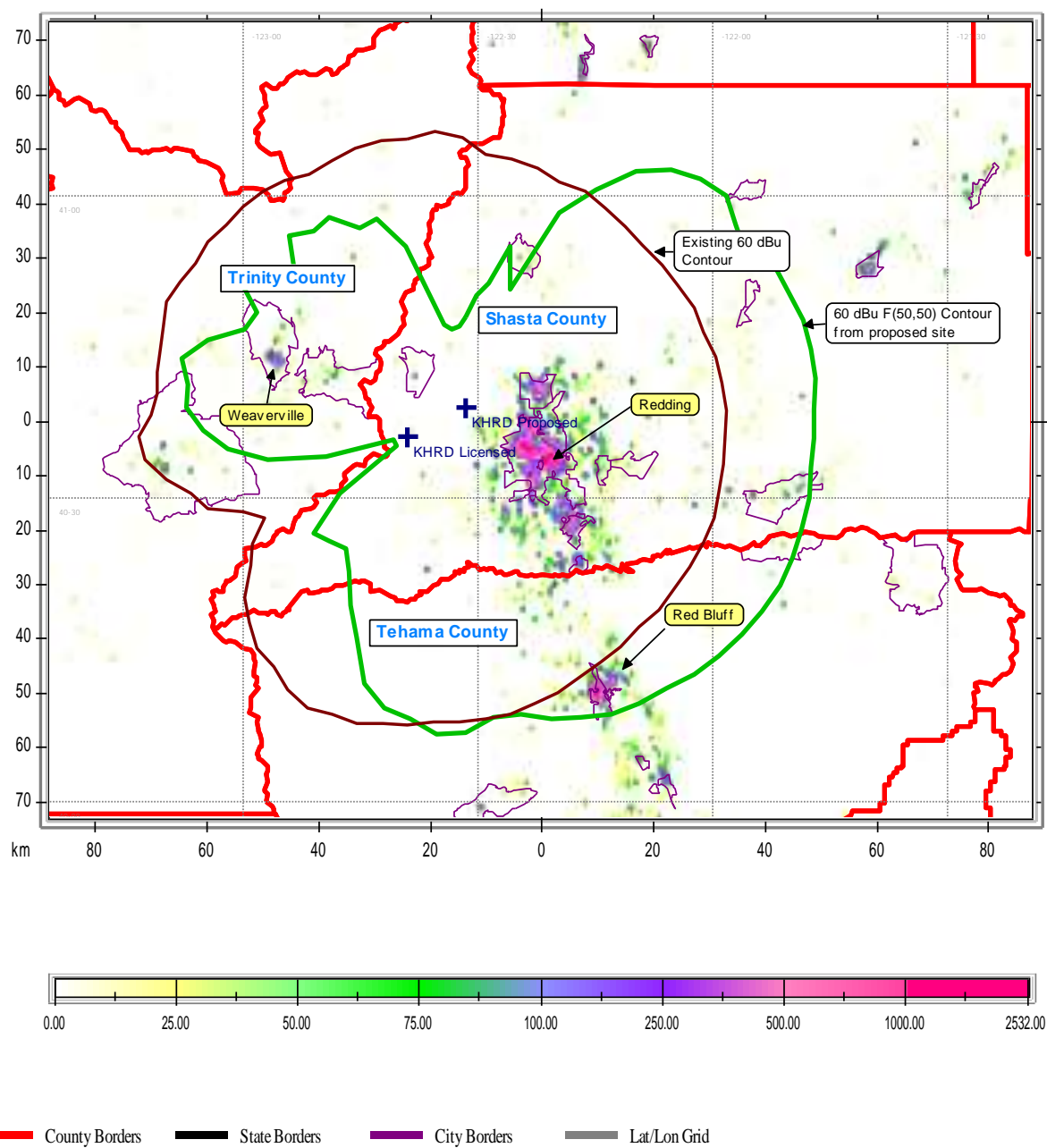


City Grade Contour covers 100% of the population and area of Redding, CA

State Borders City Borders Lat/Lon Grid

Map Scale: 1:599626 1 cm = 6.00 km V/H Size: 85.69 x 103.31 km

Protected Contours of Licensed and Proposed KHRD Facilities



Map Scale: 1:1023195 1 cm = 10.23 km V/H Size: 146.23 x 176.28 km

Figure 6-A

Stations Serving Weaverville with Protected Coverage

Facility ID Number	Call Sign	Channel/Frequency	Community of License
51177	KVIP-AM	540 kHz	Redding
40828	KNCQ ¹⁴	247C	Redding
66567	KFPR	205C1	Redding
51183	KVIP-FM	251C	Redding
51641	KSHA	282C	Redding
54487	KEWB	234C2	Anderson
82720	KHRD	276C2	Weaverville ¹⁵
41241	KRRX	291C	Burney
86670	KWCA	266A	Palo Cedro

Stations Serving Redding with Protected Coverage

Facility ID Number	Call Sign	Channel/Frequency	Community of License
66567	KFPR	205C1	Redding
51641	KSHA	282C	Redding
77093	KSTN	218A	Redding
51183	KVIP-FM	251C	Redding
55413	KLXR	1230	Redding
51639	KQMS-AM	1400	Redding
40828	KNCQ ¹⁶	247C	Redding
87171	KNRO	1670	Redding
51177	KVIP-AM	540	Redding
82720	KHRD ¹⁷	276C2	Weaverville
50621	KNCA	209C0	Burney
77121	KTHM (CP)	215C1	Red Bluff
170993	KRBN (CP)	232C3	Manton
54487	KEWB	234C2	Anderson
83787	KKXS	241C3	Shingletown
54039	KQMS-FM	257C2	Shasta Lake
21223	KZRO (CP)	261C1	Dunsmuir
86670	KWCA	266C2	Palo Cedro
40829	KKRO	274C2	Red Bluff
41620	KRDG	287C1	Shingletown
82687	KESR	296C3	Shasta Lake
60022	KKLC	300C1	Fall River Mills
64414	KCNR	1460	Shasta

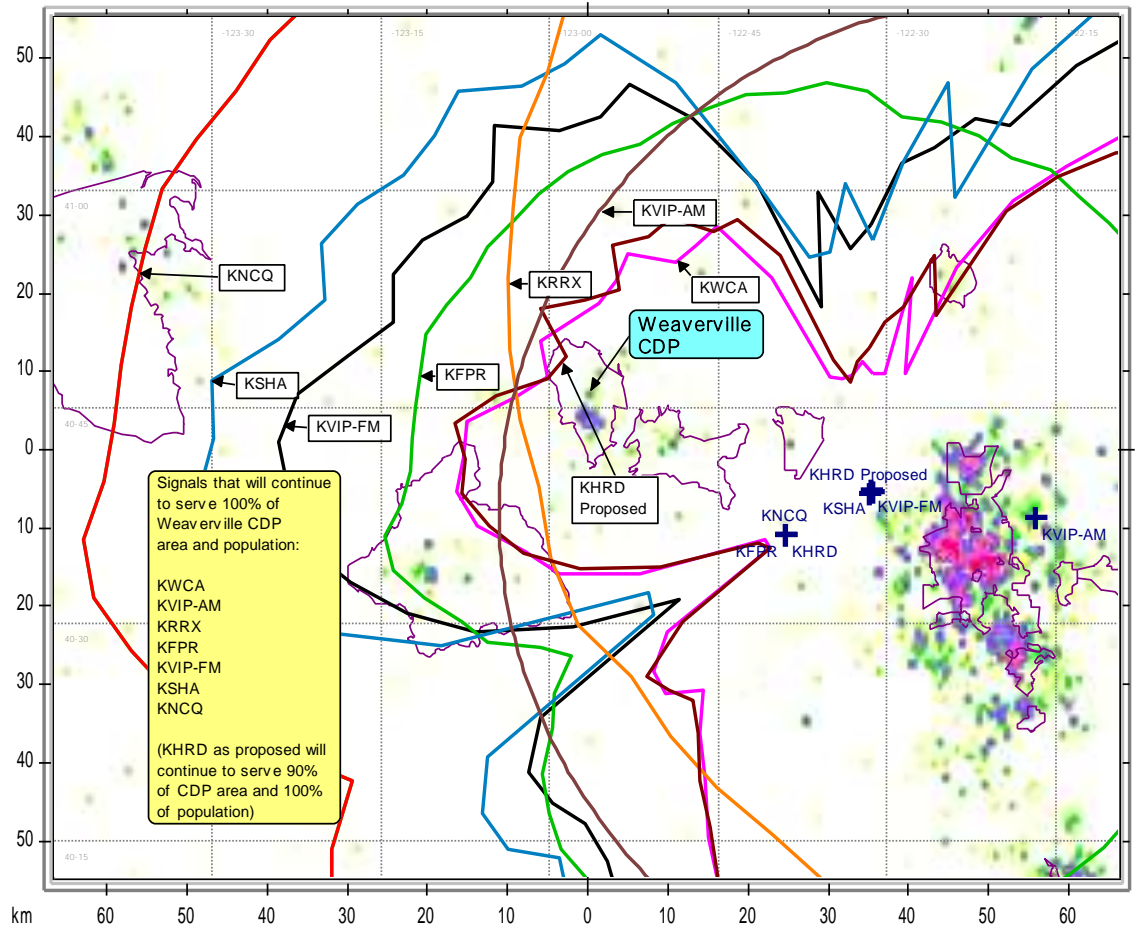
¹⁴ A concurrent application has been filed to change the community of license of KNCQ from Redding to Weaverville.

¹⁵ The proposed KHRD facility will still cover 100% of the population and 90% of the area of the Weaverville CDP with a 60 dBu F(50,50) contour.

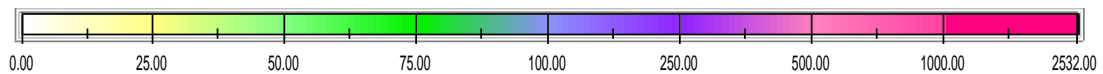
¹⁶ A concurrent application has been filed to change the community of license of KNCQ from Redding to Weaverville.

¹⁷ This application requests to change the community of license of KHRD from Weaverville to Redding. 100% of Redding is covered by the existing and proposed KHRD facilities.

Protected contours of stations remaining with Weaverville CDP coverage



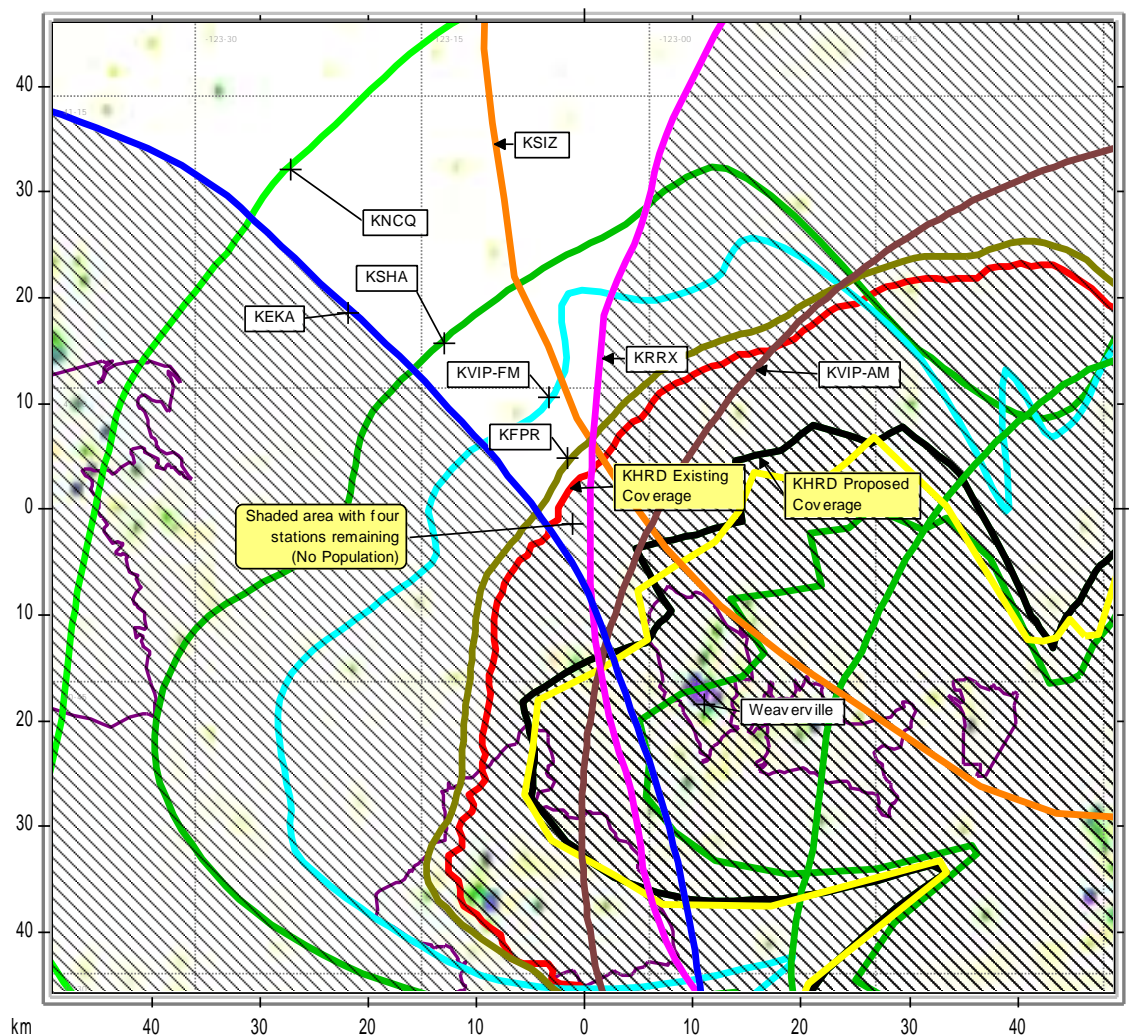
Weaverville residents will continue to receive nine stations



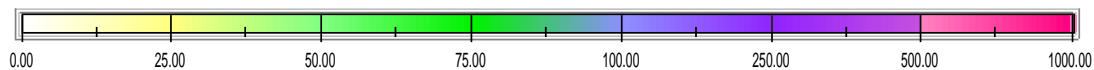
State Borders City Borders Lat/Lon Grid

Map Scale: 1:794099 1 cm = 7.94 km V/H Size: 110.19 x 132.84 km

Protected Service Contours of Stations Serving Loss Area of KHRD



Shaded area will have only four stations remaining. All other areas will have five or more.



State Borders City Borders Lat/Lon Grid

Map Scale: 1:579916 1 cm = 5.80 km V/H Size: 91.73 x 97.97 km

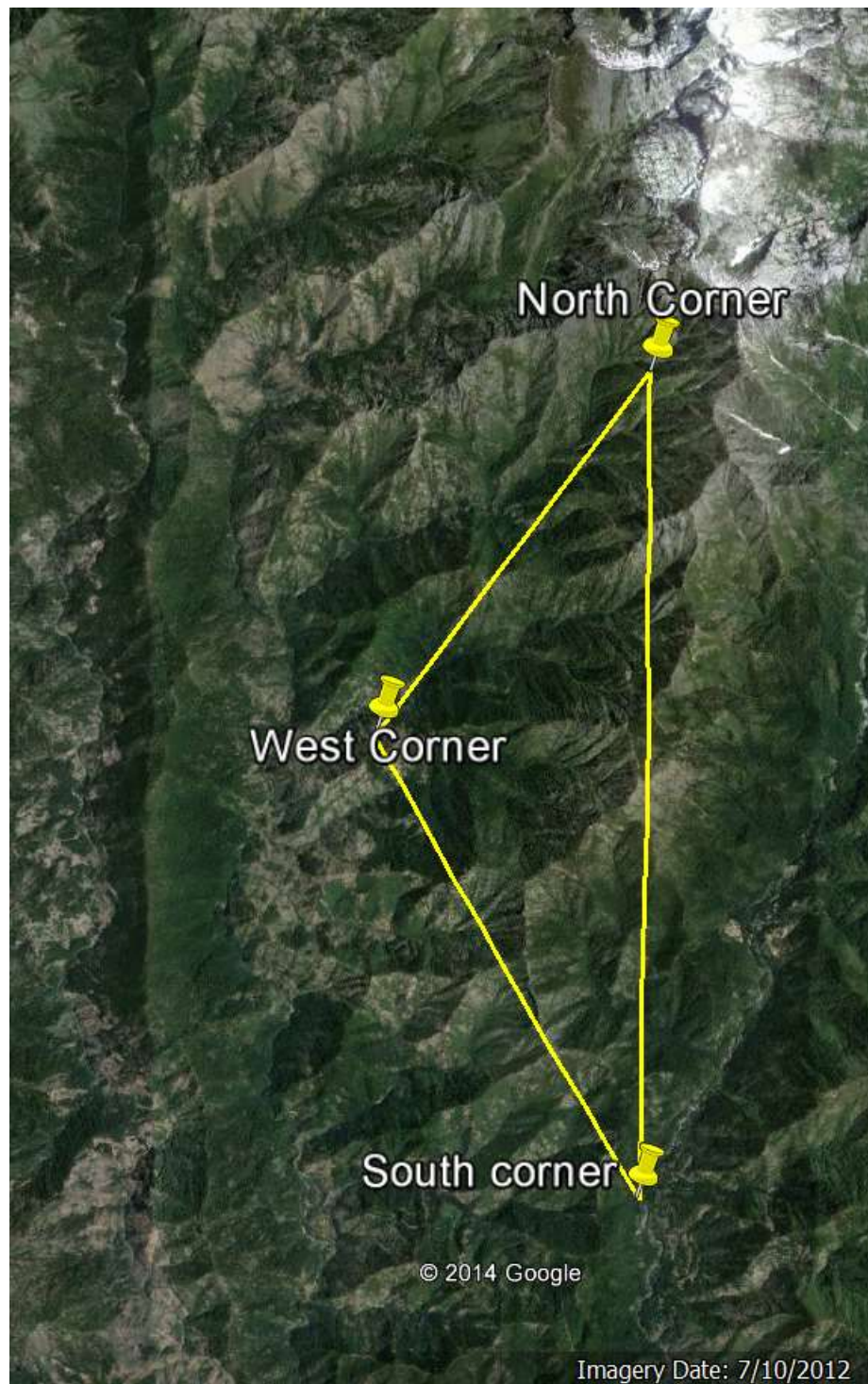
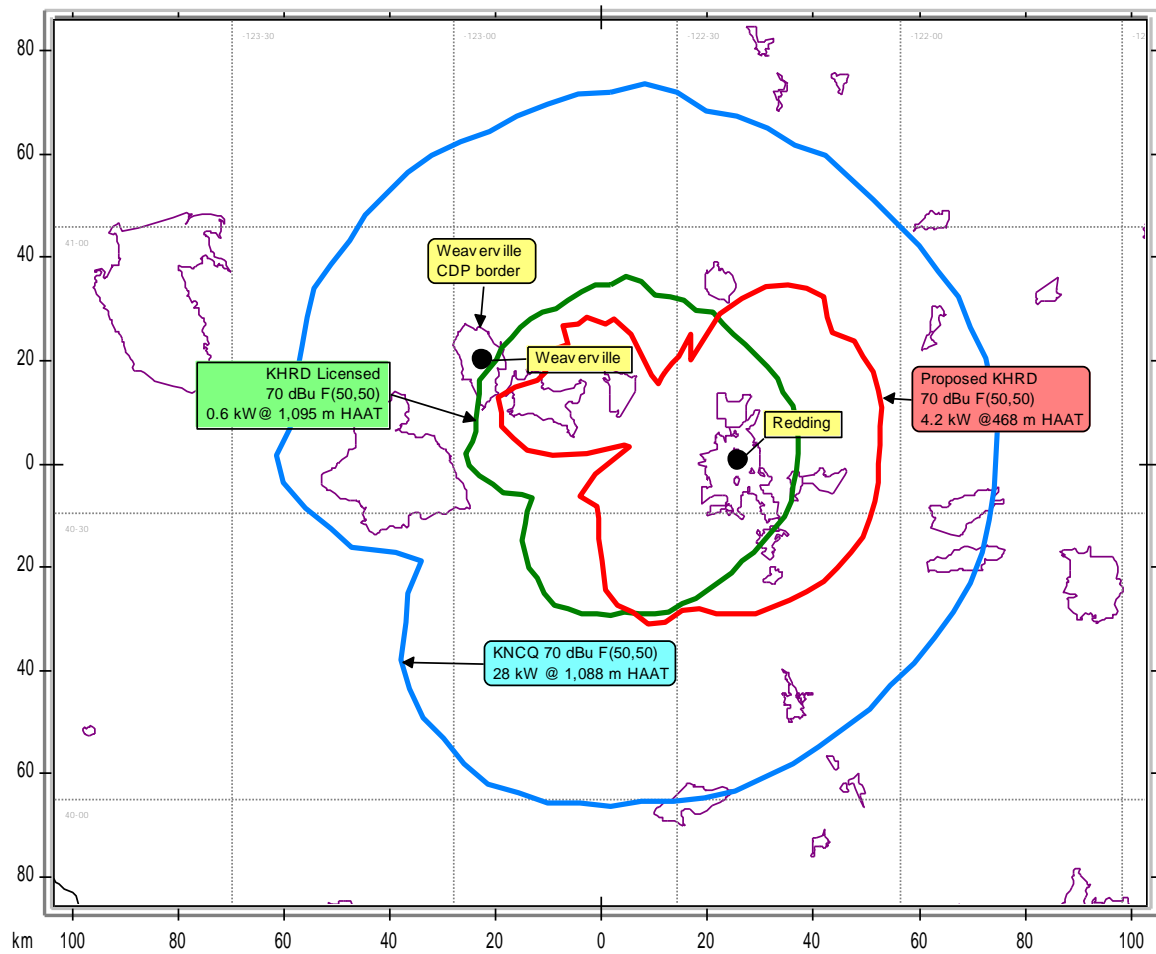


Figure 8 depicting unpopulated 24 sq. km area which will be left with only four reception services

70 dBu coverage of Weaverville from KNCQ and of KHRD licensed and proposed sites



KNCQ covers 100% of Weaverville CDP. KHRD does not

State Borders City Borders Lat/Lon Grid

Map Scale: 1:1199252 1 cm = 11.99 km V/H Size: 171.39 x 206.61 km