

**MODIFY BPH-20070119AFH**  
**CUMULUS LICENSING LLC**  
**KNRQ-FM RADIO STATION**  
**CH 250C2 - 97.9 MHZ - 3.7 KW**  
**TUALATIN, OREGON**  
**March 2008**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of station KNRQ-FM, Channel 250C, Eugene, Oregon. Cumulus also holds an outstanding construction permit to change the community of license of KNRQ-FM to Tualatin, Oregon and downgrade the station to Channel 250A (BPH-20070119AFH). Cumulus herein proposes to modify the outstanding permit for KNRQ-FM by upgrading the station to Channel 250C2 at Tualatin, Oregon at its present permit site.

In order to accommodate the upgrade to Channel 250C2, two additional changes of channel are needed. As shown on Exhibit A, in order to allow for the proposed upgrade to Channel 250C2 at Tualatin, Oregon, Channel 228C2 must be substituted for Channel 249C2 at The Dalles, Oregon. Further, to allow for the substitution at The Dalles, Oregon, Channel 291C1 must be substituted for Channel 228C1 at Condon, Oregon. Cumulus herein requests an Order to Show Cause directed to Biacoastal Media Licenses IV, LLC, licensee of KACI-FM, The Dalles, Oregon and to First Broadcast Investment Partners, LLC, permittee of KHAL, Condon, Oregon, to state why their respective facilities should not operate on Channel 228C2 in lieu of Channel 249C2 at The Dalles, Oregon, and on Channel 291C1 in lieu of Channel 228C1 at Condon,

Oregon. The channels requested at The Dalles, Oregon and Condon, Oregon can be implemented at the respective station's operating, authorized, or proposed sites. Cumulus herein states that it will reimburse the licensee of KACI-FM for costs to implement the channel change. Further, Cumulus will reimburse the permittee of KHAL for costs to implement the channel change.<sup>1</sup>

Cumulus is proposing to implement this change at an existing tower site. As such, the Federal Aviation Administration was not apprised of this proposal. KNRQ-FM will share an existing antenna already located on the tower, presently used by several other area stations. Cumulus will take sufficient measurements on the shared antenna to demonstrate that the KNRQ-FM facility meets §73.317 of the rules. These will be submitted with the KNRQ-FM license application. The tower has been registered with the Commission and assigned Antenna Structure Registration Number 1204059.

As the proposed implementation site for Channel 250C2 at Tualatin, Oregon has a minor shortspace to another facility, a clear allocation reference site has been determined for the channel. Information regarding the allocation reference site is attached as Exhibit B. Further, as the proposed implementation site has a shortage to KCYS, Channel 251A, Seaside, Oregon, Cumulus requests processing pursuant to §73.215 for the improved KNRQ-FM (see Exhibit C for details).

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1) As the permittee of KHAL has not commenced program test and has filed a modification of permit application, Cumulus requests that, should the pending modification still be pending when the proposed channel change request is ready for consideration, the modified permit be issued on Channel 291C1. Should this occur, there should be no requirement for reimbursement.

Due to the co-location of the KNRQ-FM antenna with other FM and TV stations on the same tower, and with nearby towers, the worksheets associated with FCC Form 301 could not be used to show compliance with the Commission's radio frequency radiation exposure limits. Therefore, attached as Exhibit D is a study showing that this proposal is in compliance with the RF limits.

It is noted that there is one AM station within 3.2 kilometers (2.0 miles) of this proposal. The site for station KCMD, 970 kHz, Portland, Oregon is located 1.3 kilometers from the proposed site. KCMD operates a non-directional facility during the day and a two tower directional antenna array at night. As KNRQ-FM will be diplexed into an existing antenna and transmission line already located on the tower and no tower construction is proposed, KCMD will not be impacted by this instant request. Therefore, Cumulus respectfully requests that no pre- or post-construction conditions be placed on the herein requested permit with respect to KCMD.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Cumulus and is available to the Commission upon request.<sup>2</sup>

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2) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All other necessary reviews have been or will be addressed by the applicant.