

FOR  
FCC  
USE  
ONLY

# FCC 301

## APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY

FILE NO.

### Section I - General Information

1. Legal Name of the Applicant <b>Jeff C. Chang</b>		
Mailing Address <b>269 South Beverly Drive, PMB #704</b>		
City <b>Beverly Hills</b>	State or Country (if foreign address) <b>CA</b>	ZIP Code <b>90212</b>
Telephone Number (include area code) <b>(310) 403-5039</b>	E-Mail Address (if available) <b>changmedia@aol.com</b>	
FCC Registration Number <b>0004293114</b>	Call Sign <b>KKZI</b>	Facility ID Number <b>60423</b>

2. Contact Representative (if other than applicant) <b>Kathleen Victory</b>		Firm or Company Name <b>Fletcher Heald &amp; Hildreth, PLC</b>
Mailing Address <b>1300 N. 17th, Suite 1100</b>		
City <b>Arlington</b>	State or Country (if foreign address) <b>VA</b>	ZIP Code <b>22209</b>
Telephone Number (include area code) <b>(703) 812-0473</b>	E-Mail Address (if available) <b>victory@fhhlaw.com</b>	

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

Governmental Entity       Other \_\_\_\_\_

4. **Application Purpose.**

<input type="checkbox"/> New Station	<input type="checkbox"/> Major Modification of construction permit
<input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments	<input type="checkbox"/> Minor Modification of construction permit
<input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments using Tribal Priority	<input type="checkbox"/> Major Amendment to pending application
	<input type="checkbox"/> Minor Amendment to pending application

Major Change in licensed facility

Minor Change in licensed facility

a. File number of original construction permit: \_\_\_\_\_  N/A

b. Service Type:     AM     FM     TV     DTV     DTS

c. DTV Type:     Pre-Transition     Post-Transition     Both

d. Community of License:	City <b>Barstow</b>	State <b>CA</b>
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e. Facility Type:     Main     Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No.
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**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

**Section II - Legal**

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.  Yes  No

2. **Parties to the Application.**

a. List the applicant, and, if other than a natural person, its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.

(2) Citizenship.

(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc.

(4) Percentage of votes.

(5) Percentage of total assets (equity plus debt).

(1)	(2)	(3)	(4)	(5)
Jeff C. Chang 269 South Beverly Drive PMB #704 Beverly Hills, CA 90121	US	Sole Proprietor	100	100

b. Applicant certifies that equity and financial interests not set forth above are non-attributable.

Yes  No

See Explanation in Exhibit No.

N/A

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.  
1

N/A

4. **Multiple Ownership.**

a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?

Yes  No

If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.

Exhibit No.

**Section II - Legal**

- b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules.

Yes  No

Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. Section 73.3555(a).

See Explanation  
in Exhibit No.  
1

All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R Section 73.3555.

- c. Applicant certifies that the proposed facility:
  - (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;
  - (2) complies with the Commission's policies relating to future ownership interests; and
  - (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

Yes  No

See Explanation  
in Exhibit No.

- d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. Section 121.201), and holds:

Yes  No

See Explanation  
in Exhibit No.

- (1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or
- (2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or
- (3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?

All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.

- 5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application
  - a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
  - b. any pending broadcast application in which character issues have been raised.

Yes  No

See Explanation  
in Exhibit No.

- 6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

Yes  No

See Explanation  
in Exhibit No.

- 7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

Yes  No

See Explanation  
in Exhibit No.

- 8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

Yes  No

- 9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.

Yes  No

10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.

Yes  No  N/A

Exhibit No.

An exhibit is required unless this question is inapplicable.

11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

Yes  No

12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

Yes  No  N/A

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

Yes  No  N/A

14. **Tribal Priority - Threshold Qualifications.** Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.

Yes  No

Exhibit No.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing <b>Jeff C. Chang</b>	Typed or Printed Title of Person Signing <b>Licensee</b>
Signature 	Date <b>May 18, 2023</b>

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**SECTION III PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name <b>Thomas S. Gorton P.E.</b>	Relationship to Applicant (e.g., Consulting Engineer) <b>Consulting Engineer</b>	
Signature 	Date <b>May 16, 2023</b>	
Mailing Address <b>9500 Greenwood Ave N.</b>		
City <b>Seattle</b>	State or Country (if foreign address) <b>WA</b>	ZIP Code <b>98103-3012</b>
Telephone Number (include area code) <b>(206) 783-9151</b>	E-Mail Address (if available) <b>gorton@hatdaw.com</b>	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**SECTION III - A AM Engineering**

**TECHNICAL SPECIFICATIONS** Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1. Frequency: 1310 kHz
2. Class:  A  B  C  D
3. Hours of Operation:  Unlimited  Limited  Daytime  Share Time  Specified Hours: \_\_\_\_\_

4. **Daytime Operation:**  Yes  No

a. Power: 1.0 kW

b. Antenna Location Coordinates: (NAD 27)

34 ° 54 ' 51 "  N  S Latitude  
117 ° 01 ' 04 "  E  W Longitude

c. **Nondirectional:**  Yes  No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 296.173 mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	52.7
Antenna structure registration	_____ Number <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	50.9
Electrical height of radiator (degrees)	80.0
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

**TECH BOX - DAYTIME OPERATION**

**d. Directional:**

Yes  No  
 Exhibit No.

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Theoretical \_\_\_\_\_ mV/m at 1 km

Standard RMS: \_\_\_\_\_ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

Yes  No

If "Yes," complete the following:

Augmented RMS: \_\_\_\_\_ mV/m at 1 km

Azimuth                      Span                      Augmentation radiation (mV/m at 1 km)


**TECH BOX - NIGHTTIME OPERATION**

5. **Nighttime Operation:**

Yes  No

a. Power: 0.08 kW

b. Antenna Location Coordinates: (NAD 27)

34<sup>°</sup> 54<sup>'</sup> 51<sup>"</sup>  N  S Latitude  
117<sup>°</sup> 01<sup>'</sup> 04<sup>"</sup>  E  W Longitude

c. **Nondirectional:**

Yes  No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 296.173 mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	<b>52.7</b>
Antenna structure registration	<p style="text-align: center;">Number</p> <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	<b>50.9</b>
Electrical height of radiator (degrees)	<b>80.0</b>
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

**TECH BOX - NIGHTTIME OPERATION**

**d. Directional:**

Yes  No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical \_\_\_\_\_ mV/m at 1 km

Standard RMS: \_\_\_\_\_ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

**Augmented:**

Yes  No

If "Yes," complete the following:

Augmented RMS: \_\_\_\_\_ mV/m at 1 km

Azimuth \_\_\_\_\_ Span \_\_\_\_\_ Augmentation radiation \_\_\_\_\_


**TECH BOX - CRITICAL HOURS OPERATION**

6. Critical Hours Operation:

Yes  No

a. Power: \_\_\_\_\_ kW

b. Antenna Location Coordinates: (NAD 27)

\_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ "  N  S Latitude  
 \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ "  E  W Longitude

c. Nondirectional:

Yes  No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical \_\_\_\_\_ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<p style="text-align: center;">_____ Number</p> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (meters)	
A	
B	
C	
D	

**TECH BOX - CRITICAL HOURS OPERATION**

**d. Directional:**

Yes  No  
 Exhibit No.

if "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Theoretical \_\_\_\_\_ mV/m at 1 km

Standard RMS: \_\_\_\_\_ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

**Augmented:**

Yes  No

If "Yes," complete the following:

Augmented RMS: \_\_\_\_\_ mV/m at 1 km

Azimuth                      Span                      Augmentation radiation


**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

**CERTIFICATION**

7. **Broadcast Facility.** The proposed facility complies with the engineering standards and assignment requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650. **Exhibit Required.**  Yes  No See Explanation in Exhibit No.  
Exhibit No. Eng Rpt
8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).  Yes  No See Explanation in Exhibit No.
9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.  Yes  No See Explanation in Exhibit No.
10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.
- Groundwave.**
- a.  47 C.F.R. Section 73.37
- Skywave.**
- b.  47 C.F.R. Section 73.182.
- Critical Hours.**
- c.  47 C.F.R. Section 73.187.
11. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.**  Yes  No See Explanation in Exhibit No.  
Exhibit No. Eng Rpt
- By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.
12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).  Yes  No  N/A See Explanation in Exhibit No.  
Exhibit No.
- An exhibit is required** unless this question is not applicable.
13. **Dispositive Section 307(b) Preference**
- a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?  Yes  No
- b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.  Yes  No  N/A See Explanation in Exhibit No.  
Exhibit No.
- c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.  Yes  No See Explanation in Exhibit No.  
Exhibit No.

STEPHEN S. LOCKWOOD, PE, PMP

THOMAS M. ECKELS, PE  
ERIK C. SWANSON, PE, PMP  
THOMAS S. GORTON, PE

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
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MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

## ENGINEERING REPORT

### APPLICATION for CONSTRUCTION PERMIT to REDUCE POWER and MODIFY ANTENNA

KKZI(AM)

1310 kHz

Barstow, California

Facility ID 60423

1 kW Day, 80 Watts Night ND-U

Jeff Chang

May 2023

## Purpose of Application

This Engineering Report has been prepared in support of an application by Jeff Chang to reduce the power of KKZI(AM), 1310 kHz, Barstow, California from 5 kW to 1 kW daytime and from 120 watts to 80 watts nighttime. The presently licensed directional antenna will be replaced by a non-directional antenna, using one of the existing KKZI antennas. No tower construction or modification is proposed. Chang has negotiated a new lease for the currently licensed transmitter site, and KKZI is currently operating from this site under STA.

## Allocation Considerations

### Daytime

The proposed 1 kW non-directional operation of KKZI will not result in prohibited contour overlap with any licensed or proposed facility. Existing contour overlap with KAZN is eliminated by this proposal. All allocation studies included in this report are based on data from the May 16, 2023 edition of the CDBS and M3 ground conductivity data.

### Nighttime

The proposed 80 watt non-directional nighttime operation of KKZI will enter the 25% RSS threshold of the following domestic facilities:

KMKY Oakland, CA (Licensed & CP)

KIHP Mesa, AZ

The RSS contribution of KKZI to both of these facilities will be reduced by this proposal, as demonstrated by the site to site RSS calculations included in this report. KKZI will not enter the 50% RSS of any Mexican facilities.

## Facilities Proposed

Chang proposes continued operation of KKZI on 1310 kHz with a power of 1 kW daytime and 80 watts nighttime using a non-directional antenna. The antenna used will be the #1 (southwest) tower of the existing KKZI array, and the geographic coordinates used in this application are those of this tower rather than the current center of array coordinates.

The unused tower will be floated.

The proposed daytime 5 mV/m contour will cover 100% of Barstow, as demonstrated in the map exhibit titled *KKZI Barstow Community Coverage Contour Map*.

The Ground system consists of 120 equally spaced, buried, copper radials about the base of the tower, each 160 feet in length. Radials are connected to an octagonal ring of ½ inch copper tubing approx. 20 feet out from tower<sup>1</sup>

The calculated efficiency of the 80° tower with a 180 foot (86.3°) ground system is 296.173 mV/m/km at 1 kW.

The population within the 1V/m blanketing contour of the proposed 1 kW daytime operation of KKZI is 29 persons<sup>2</sup>, thus satisfying the requirements of §73.24(g).

Antenna tower access is restricted by fences with locked gates that are at least 2 meters from the tower bases. The antenna towers are posted with warning signs, and all station personnel and contractors will be required to follow appropriate safety procedures before any work is commenced on the antenna towers, including reduction in power or discontinuance of operation before any maintenance work is undertaken.

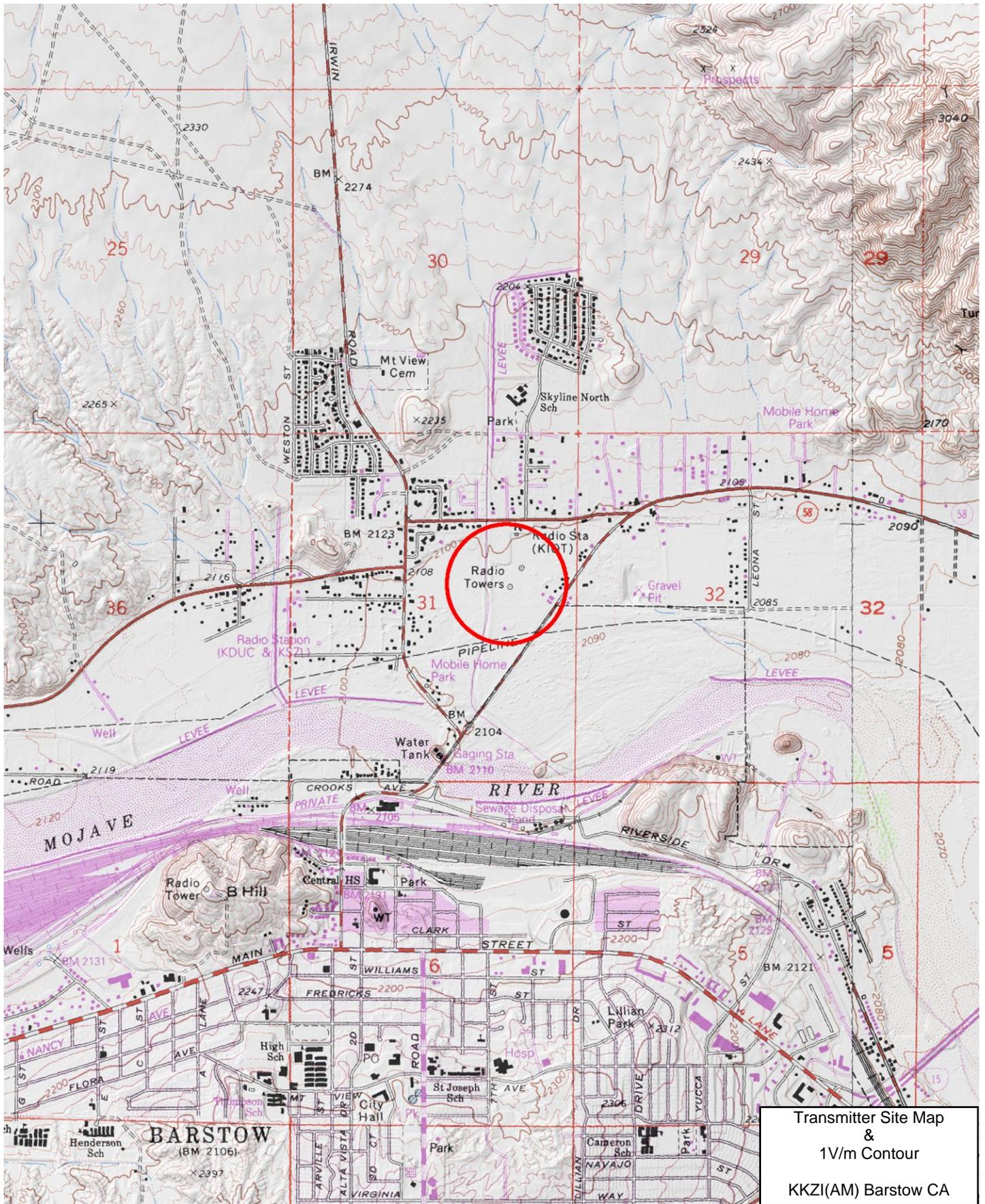
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<sup>1</sup>BZ-830627AD

<sup>2</sup>Based on 2020 US Census data, block centroid method.



KKZI Transmitter Site Photograph



Transmitter Site Map  
&  
1V/m Contour  
KKZI(AM) Barstow CA

Mercator Projection  
WGS84

UTM Zone 11S



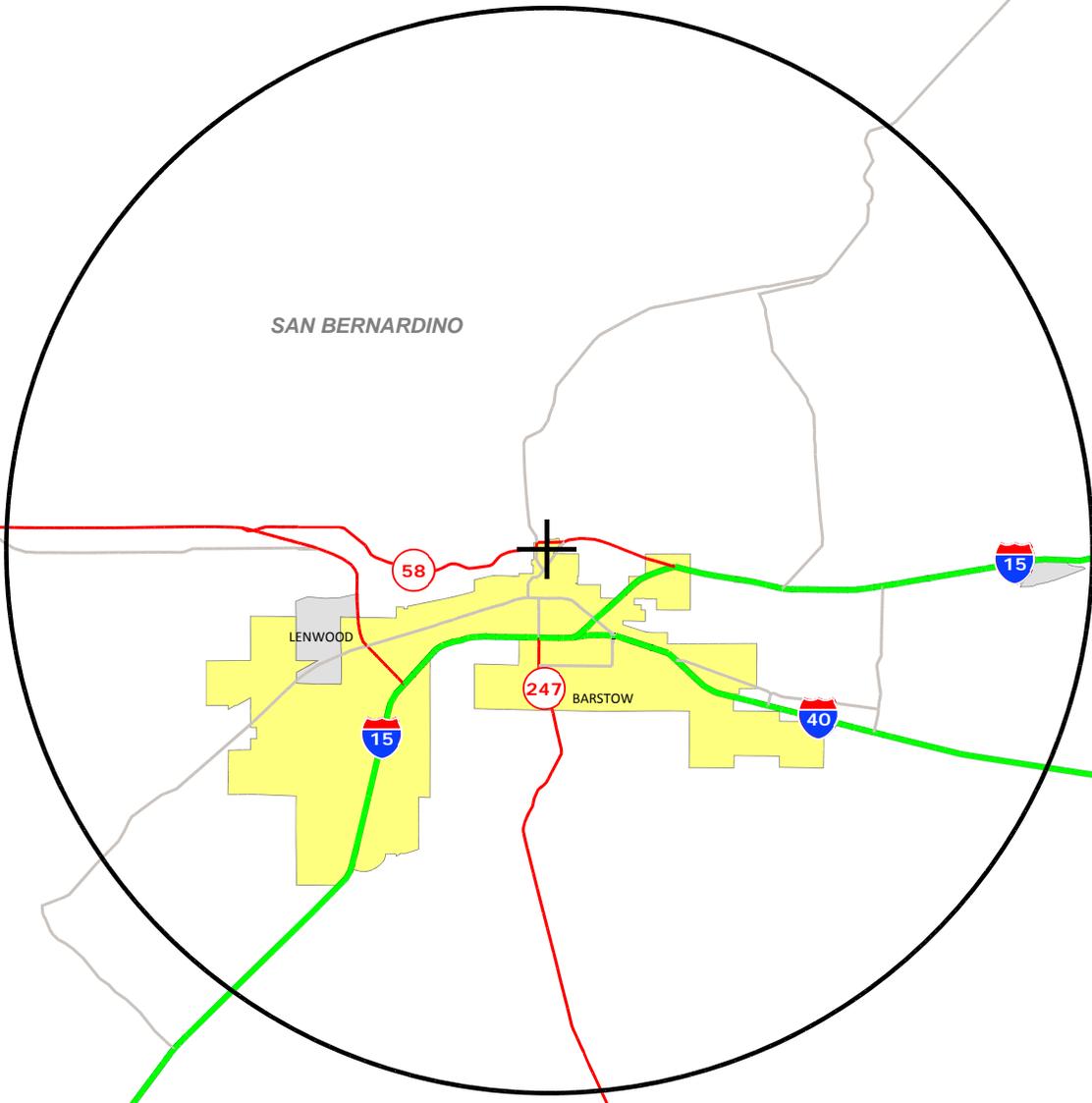
0.5 1.0 1.5 mi  
Scale 1:24000 1 inch = 2000 feet



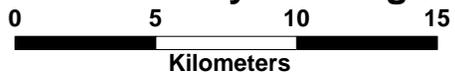
MN  
11.5°



# Day 5 mV/m



**KKZI Barstow Community Coverage Contour Map**



©2013 CALIPER

Hatfield & Dawson

5/2023

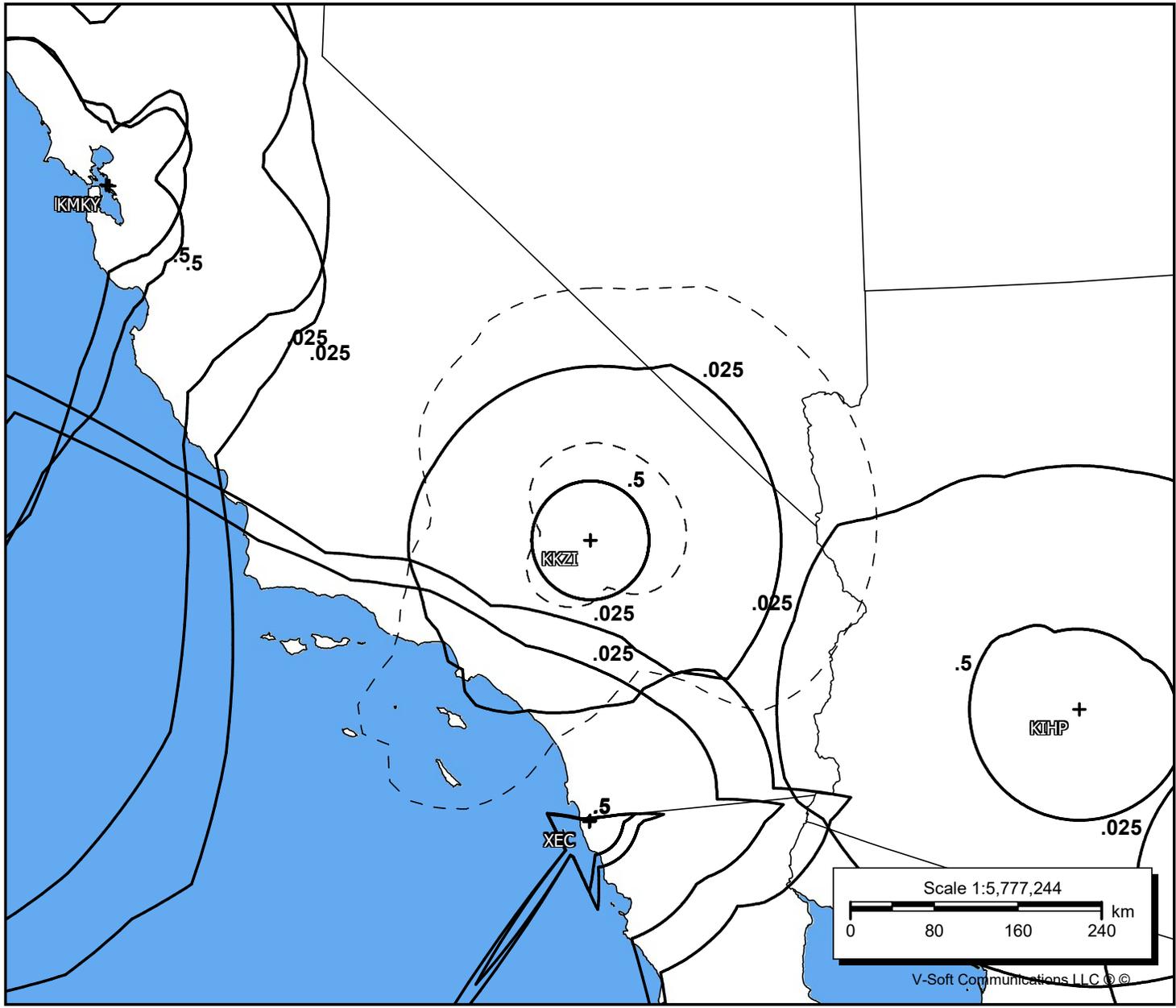
KKZI

Freq: 1310 kHz  
Class: D  
Latitude: 34-54-51 N  
Longitude: 117-01-04 W  
Power: 1 kW  
RMS: 296.173 mV/m @1km  
# Towers: 1  
# Augs: 0

Daytime Allocation Study

Co-Channel

Dashed Lines are  
Licensed Contours



KKZI

Freq: 1310 kHz

Class: D

Latitude: 34-54-51 N

Longitude: 117-01-04 W

Power: 1 kW

RMS: 296.173 mV/m @1km

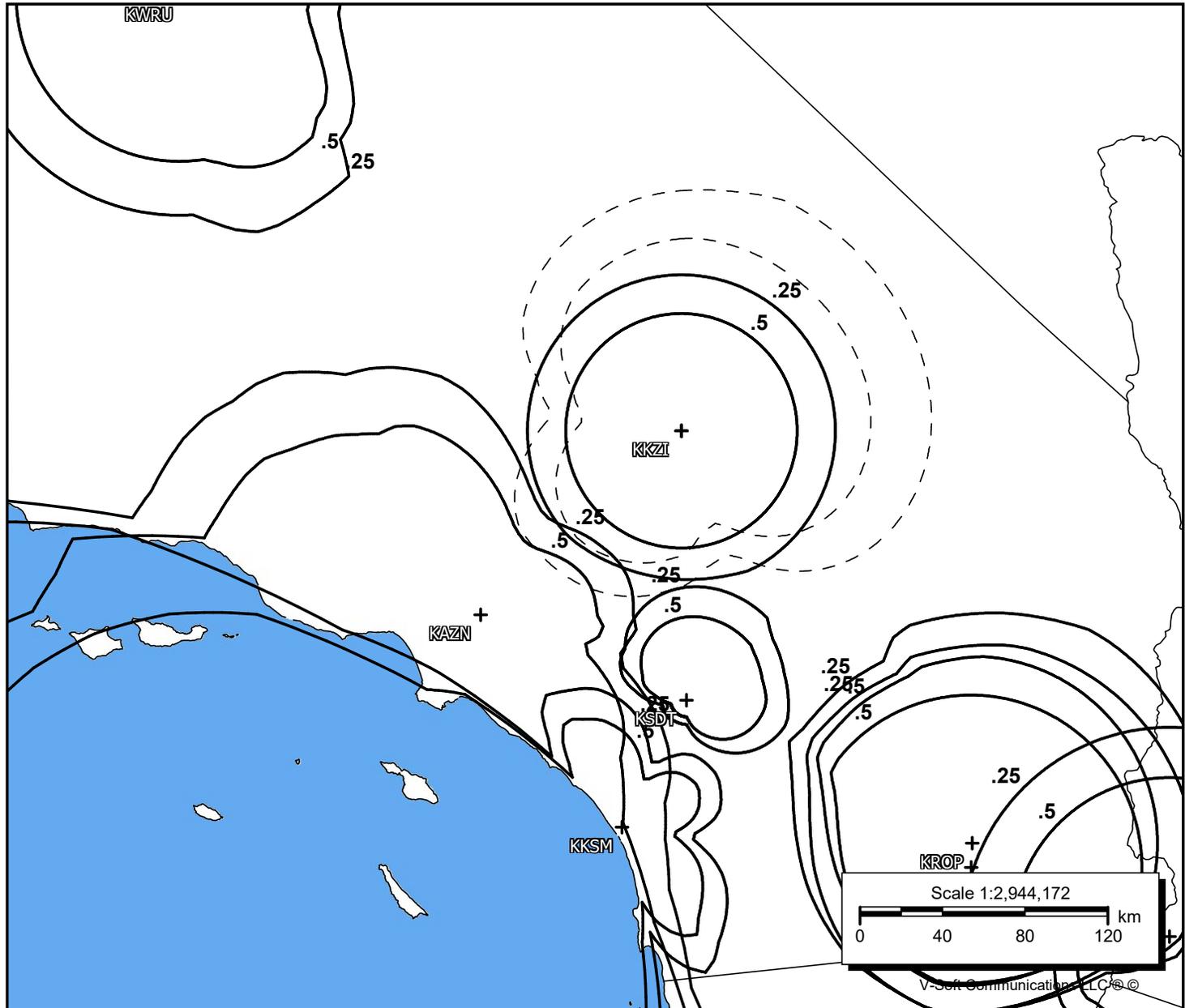
# Towers: 1

# Augs: 0

Daytime Allocation Study

1st-Adjacent Channel

Dashed Lines are  
Licensed Contours



KKZI

Freq: 1310 kHz

Class: D

Latitude: 34-54-51 N

Longitude: 117-01-04 W

Power: 1 kW

RMS: 296.173 mV/m @1km

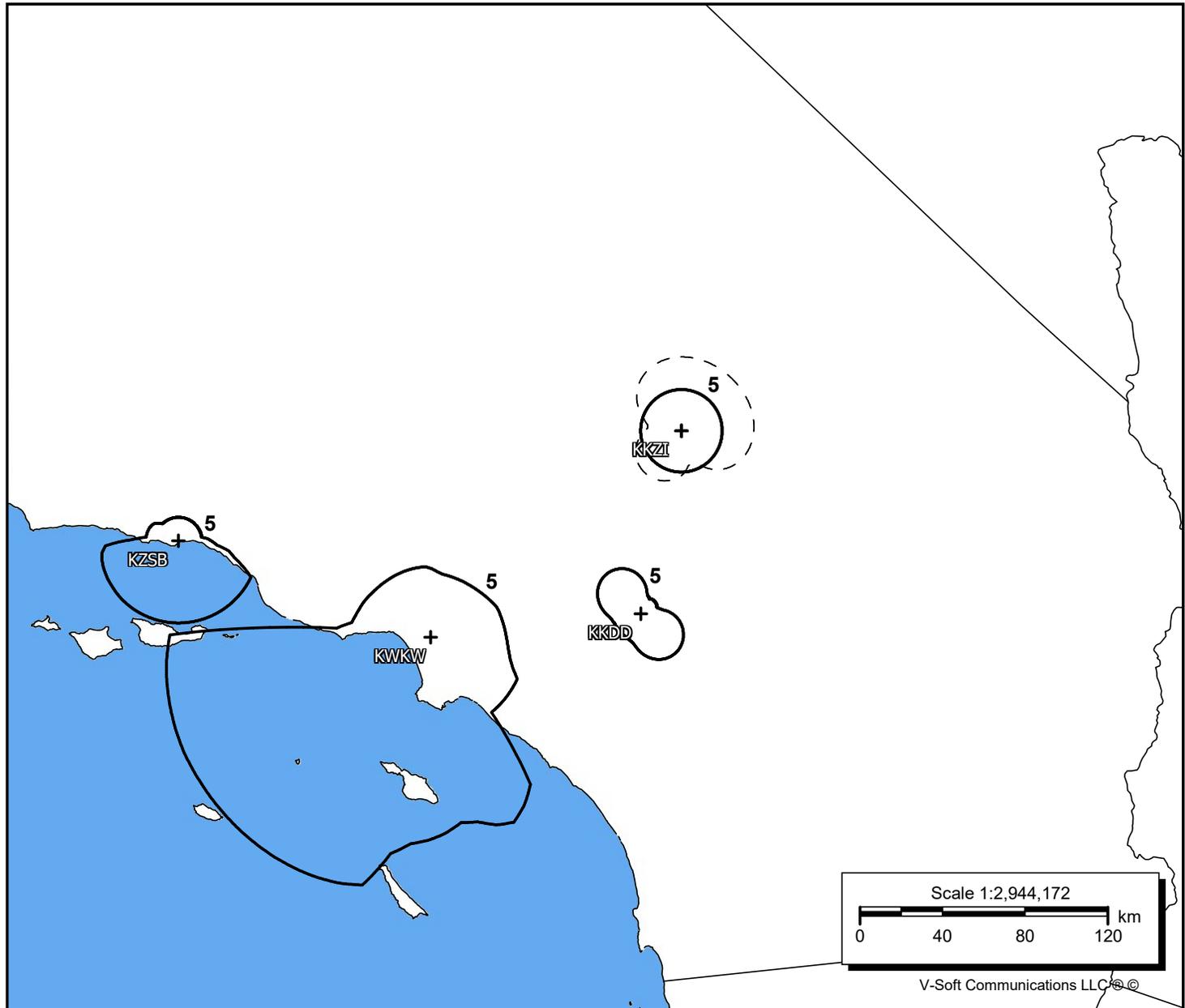
# Towers: 1

# Augs: 0

Daytime Allocation Study

2nd-Adjacent Channel

Dashed Lines are  
Licensed Contours



Scale 1:2,944,172

0 40 80 120 km

V-Soft Communications LLC ©

KKZI

Freq: 1310 kHz

Class: D

Latitude: 34-54-51 N

Longitude: 117-01-04 W

Power: 1 kW

RMS: 296.173 mV/m @1km

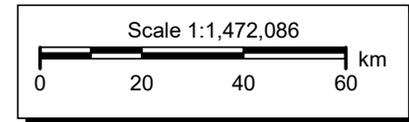
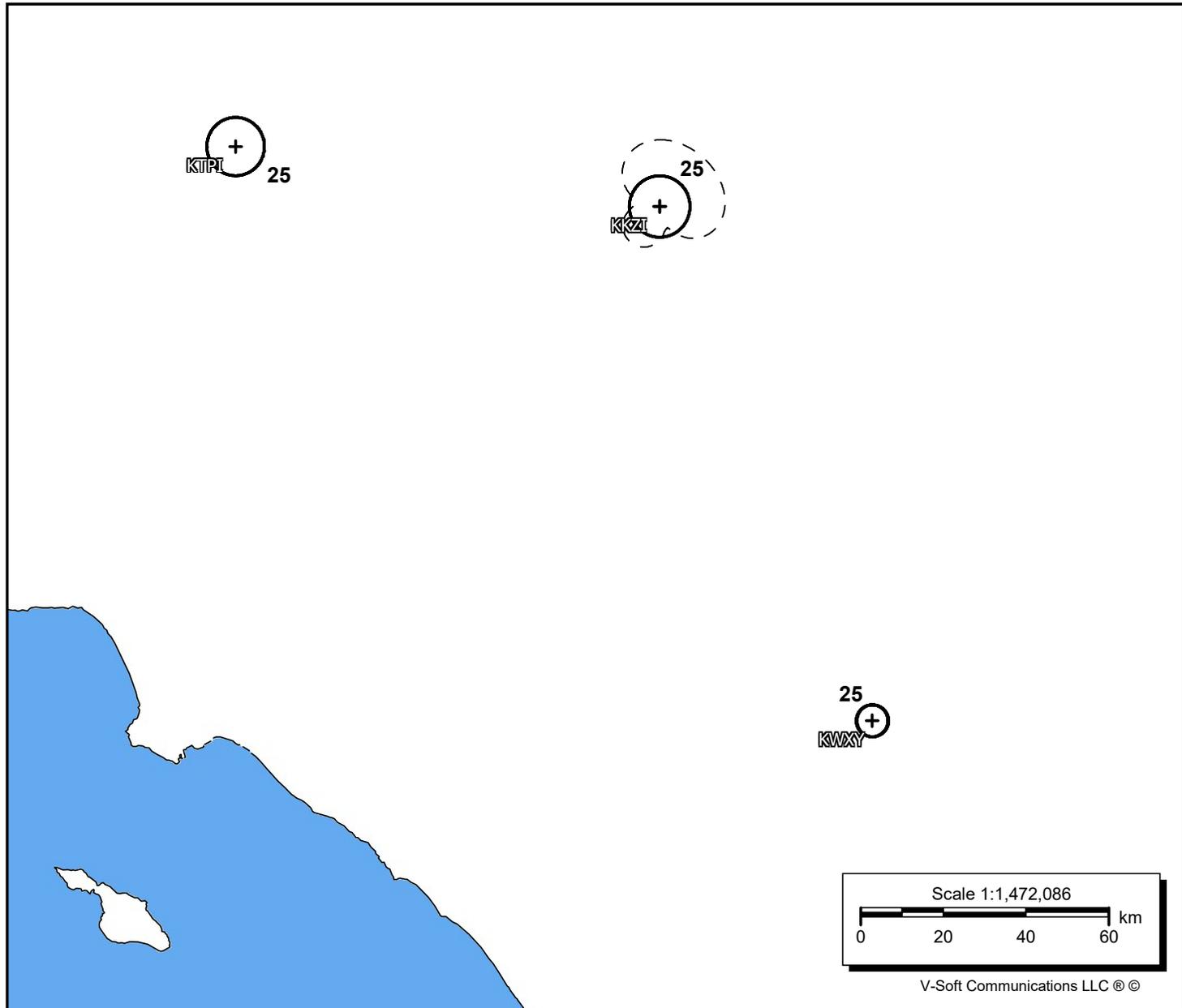
# Towers: 1

# Augs: 0

Daytime Allocation Study

3rd-Adjacent Channel

Dashed Lines are  
Licensed Contours



V-Soft Communications LLC ©

## Site to Site RSS Calculations

Protected Station: KMKY, 1310 kHz - OAKLAND, CA, US  
 Coordinates: 37-49-27 N, 122-19-10 W  
 Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)	Call	Freq (kHz)	Limit (mV/m)	(%)
XEC/A	1310	2.078	100.0	XEC/A	1310	2.078	100.0
KEIN	1310	1.796	86.4	KEIN	1310	1.796	86.4
<b>*KKZI</b>	<b>1310</b>	<b>1.651</b>	<b>60.1</b>	<b>*KKZI-PRO</b>	<b>1310</b>	<b>1.650</b>	<b>60.0</b>
-----	50%	-----		-----	50%	-----	
KWRU	1300	1.468	45.8	KWRU	1300	1.468	45.8
KTCK	1310	1.399	39.6	KTCK	1310	1.399	39.6
KIHP	1310	1.358	35.8	KIHP	1310	1.358	35.8
KNPT	1310	1.288	31.9	KNPT	1310	1.288	31.9
KDSO	1300	1.077	25.4	KDSO	1300	1.077	25.4
-----	25%	-----		-----	25%	-----	
KFKA	1310	1.005	23.0	KFKA	1310	1.005	23.0
KLIX	1310	0.978	21.8	KLIX	1310	0.978	21.8
KIFM	1320	0.956	20.8	KIFM	1320	0.956	20.8
XELPZ/A	1310	0.758	16.1	XELPZ/A	1310	0.758	16.1
WTLC	1310	0.600	12.6	WTLC	1310	0.600	12.6
KOKX	1310	0.587	12.2	KOKX	1310	0.587	12.2
UNK-A	1310	0.555	11.5	UNK-A	1310	0.555	11.5
KAZN	1300	0.553	11.4	KAZN	1300	0.553	11.4
YNKS-A	1310	0.538	11.0	YNKS-A	1310	0.538	11.0
1310CHLW/	1310	0.528	10.7	1310CHLW/	1310	0.528	10.7
KKOL	1300	0.522	10.5	KKOL	1300	0.522	10.5

Protected Station: KMKY, 1310 kHz - OAKLAND, CA, US  
 Coordinates: 37-49-02 N, 122-17-10 W  
 Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEC/A	1310	2.088	100.0
KEIN	1310	1.798	86.1
<b>*KKZI</b>	<b>1310</b>	<b>1.666</b>	<b>60.4</b>
----- 50% -----			
KWRU	1300	1.471	45.6
KTCK	1310	1.403	39.6
KIHP	1310	1.365	35.8
KNPT	1310	1.285	31.7
KDSO	1300	1.063	25.0
----- 25% -----			
KFKA	1310	1.007	23.0
KLIX	1310	0.981	21.8
KIFM	1320	0.946	20.5
XELPZ/A	1310	0.760	16.1
WTLC	1310	0.601	12.6
KOKX	1310	0.589	12.2
UNK-A	1310	0.556	11.5
KAZN	1300	0.550	11.3
YNKS-A	1310	0.539	11.0
1310CHLW/	1310	0.526	10.6
KKOL	1300	0.521	10.5

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEC/A	1310	2.088	100.0
KEIN	1310	1.798	86.1
<b>*KKZI-PRO</b>	<b>1310</b>	<b>1.661</b>	<b>60.2</b>
----- 50% -----			
KWRU	1300	1.471	45.7
KTCK	1310	1.403	39.6
KIHP	1310	1.365	35.8
KNPT	1310	1.285	31.7
KDSO	1300	1.063	25.0
----- 25% -----			
KFKA	1310	1.007	23.0
KLIX	1310	0.981	21.8
KIFM	1320	0.946	20.5
XELPZ/A	1310	0.760	16.2
WTLC	1310	0.601	12.6
KOKX	1310	0.589	12.2
UNK-A	1310	0.556	11.5
KAZN	1300	0.550	11.3
YNKS-A	1310	0.539	11.0
1310CHLW/	1310	0.526	10.6
KKOL	1300	0.521	10.5

Protected Station: XEC/A, 1310 kHz - TIJUANA, BN, MX  
 Coordinates: 32-31-15 N, 117-01-16 W  
 Standard: Mexican [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.172	100.0
KIHP	1310	3.696	88.5
----- 50% -----			
KLIX	1310	2.561	45.9
KTCK	1310	2.251	36.7
XELPZ/A	1310	2.188	33.4
----- 25% -----			
KEIN	1310	1.345	19.5
*KKZI	1310	1.092	15.5
KFKA	1310	0.822	11.5

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.172	100.0
KIHP	1310	3.696	88.5
----- 50% -----			
KLIX	1310	2.561	45.9
<b>*KKZI-PRO</b>	<b>1310</b>	<b>2.409</b>	<b>39.2</b>
KTCK	1310	2.251	34.1
XELPZ/A	1310	2.188	31.4
----- 25% -----			
KEIN	1310	1.345	18.4
KFKA	1310	0.822	11.0

Protected Station: XEC1/O, 1310 kHz - TIJUANA, BN, MX  
 Coordinates: 32-31-15 N, 117-01-16 W  
 Standard: Mexican [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.172	100.0
KIHP	1310	3.696	88.5
-----	50%	-----	-----
KLIX	1310	2.561	45.9
KTCK	1310	2.251	36.7
XELPZ/A	1310	2.188	33.4
-----	25%	-----	-----
KEIN	1310	1.345	19.5
*KKZI	1310	1.092	15.5
KFKA	1310	0.822	11.5

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.172	100.0
KIHP	1310	3.696	88.5
-----	50%	-----	-----
KLIX	1310	2.561	45.9
<b>*KKZI-PRO</b>	<b>1310</b>	<b>2.409</b>	<b>39.2</b>
KTCK	1310	2.251	34.1
XELPZ/A	1310	2.188	31.4
-----	25%	-----	-----
KEIN	1310	1.345	18.4
KFKA	1310	0.822	11.0

Protected Station: XEC/O, 1310 kHz - TIJUANA, BN, MX  
 Coordinates: 32-30-43 N, 117-01-42 W  
 Standard: Mexican [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.169	100.0
KIHP	1310	3.692	88.5
-----	50%	-----	-----
KLIX	1310	2.557	45.9
KTCK	1310	2.249	36.7
XELPZ/A	1310	2.189	33.5
-----	25%	-----	-----
KEIN	1310	1.342	19.4
*KKZI	1310	1.093	15.5
KFKA	1310	0.821	11.5

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KMKY	1310	4.169	100.0
KIHP	1310	3.692	88.5
-----	50%	-----	-----
KLIX	1310	2.557	45.9
<b>*KKZI-PRO</b>	<b>1310</b>	<b>2.407</b>	<b>39.2</b>
KTCK	1310	2.249	34.1
XELPZ/A	1310	2.189	31.4
-----	25%	-----	-----
KEIN	1310	1.342	18.4
KFKA	1310	0.821	11.0

Protected Station: KIHP, 1310 kHz - MESA, AZ, US  
 Coordinates: 33-21-43 N, 111-58-03 W  
 Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KTCK	1310	4.628	100.0
XEC/A	1310	3.681	79.5
<b>*KKZI</b>	<b>1310</b>	<b>3.128</b>	<b>52.8</b>
-----	50%	-----	-----
KFKA	1310	2.539	37.9
XELPZ/A	1310	2.083	29.1
KLIX	1310	2.036	27.3
-----	25%	-----	-----
KEIN	1310	1.529	19.7
XEHY/A	1310	1.158	14.6
XEHV/A	1310	1.084	13.6
YNKS-A	1310	1.008	12.5
XEGRT/A	1310	1.007	12.4
UNK-A	1310	0.998	12.2
XEPO/A	1310	0.994	12.0
XEHJ/A	1310	0.975	11.7
KOKX	1310	0.973	11.6
KZRG	1310	0.867	10.3
KDLS	1310	0.862	10.2

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KTCK	1310	4.628	100.0
XEC/A	1310	3.681	79.5
-----	50%	-----	-----
KFKA	1310	2.539	42.9
XELPZ/A	1310	2.083	32.3
KLIX	1310	2.036	30.0
<b>*KKZI-PRO</b>	<b>1310</b>	<b>1.969</b>	<b>27.8</b>
-----	25%	-----	-----
KEIN	1310	1.529	20.8
XEHY/A	1310	1.158	15.4
XEHV/A	1310	1.084	14.3
YNKS-A	1310	1.008	13.1
XEGRT/A	1310	1.007	13.0
UNK-A	1310	0.998	12.8
XEPO/A	1310	0.994	12.6
XEHJ/A	1310	0.975	12.3
KOKX	1310	0.973	12.2
KZRG	1310	0.867	10.7
KDLS	1310	0.862	10.6
KMKY	1310	0.847	10.4
WTLC	1310	0.841	10.2

Protected Station: KLIX, 1310 kHz - TWIN FALLS, ID, US  
 Coordinates: 42-33-06 N, 114-22-03 W  
 Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KEIN	1310	5.990	100.0
KFKA	1310	3.051	50.9
-----	50%	-----	-----
KMKY	1310	2.030	30.1
-----	25%	-----	-----
KNPT	1310	1.732	24.6
*KKZI	1310	1.617	22.3
KTCK	1310	1.345	18.1
KIHP	1310	1.328	17.6
XEC/A	1310	1.096	14.3
KOKX	1310	1.042	13.4
KNIT	1320	0.959	12.3
WTLC	1310	0.953	12.1
KNOX	1310	0.811	10.2
KDLS	1310	0.810	10.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KEIN	1310	5.990	100.0
KFKA	1310	3.051	50.9
-----	50%	-----	-----
KMKY	1310	2.030	30.1
-----	25%	-----	-----
KNPT	1310	1.732	24.6
KTCK	1310	1.345	18.5
KIHP	1310	1.328	18.0
XEC/A	1310	1.096	14.6
KOKX	1310	1.042	13.7
KNIT	1320	0.959	12.5
WTLC	1310	0.953	12.3
<b>*KKZI-PRO</b>	<b>1310</b>	<b>0.888</b>	<b>11.4</b>
KNOX	1310	0.811	10.4
KDLS	1310	0.810	10.3

Protected Station: XEFH/O, 1310 kHz - AGUA PRIETA, SO, MX  
 Coordinates: 31-17-35 N, 109-32-02 W  
 Standard: Mexican [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KTCK	1310	8.387	100.0
KFKA	1310	5.313	63.3
-----	50%	-----	-----
KIHP	1310	4.205	42.3
XELPZ/A	1310	3.622	33.5
-----	25%	-----	-----
XEC/A	1310	2.809	24.6
KLIX	1310	2.128	18.1
*KKZI	1310	1.978	16.6
KMKY	1310	1.577	13.0
XEPO/A	1310	1.538	12.6
XEHY/A	1310	1.487	12.1
XEVB/A	1310	1.470	11.8
KZRG	1310	1.282	10.2

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KTCK	1310	8.387	100.0
KFKA	1310	5.313	63.3
-----	50%	-----	-----
KIHP	1310	4.205	42.3
XELPZ/A	1310	3.622	33.5
-----	25%	-----	-----
XEC/A	1310	2.809	24.6
KLIX	1310	2.128	18.1
KMKY	1310	1.577	13.2
XEPO/A	1310	1.538	12.8
XEHY/A	1310	1.487	12.2
XEVB/A	1310	1.470	12.0
<b>*KKZI-PRO</b>	<b>1310</b>	<b>1.393</b>	<b>11.3</b>
KZRG	1310	1.282	10.3

## Statement of Engineer

This Engineering Report, relative to a change in facilities for KKZI(AM) has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am an engineer in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Oregon.

Signed this 18th day of May 2023



Thomas S. Gorton, P.E.

## Other Attributable Interests and Multiple Ownership Compliance

Jeff C. Chang is the licensee of the following stations:

KKZI(AM)	60423	Barstow, <b>CA</b>
KQTE(AM)	160413	Helendale, <b>CA</b>
K268DU	200953	Victorville, <b>CA</b>
KPJC-LD	182962	San Francisco, <b>CA</b>
KGBY-LD	187909	Palm Springs, <b>CA</b>
KRPH(FM)	166065	Morristown, AZ – assignment pending

Station KKZI (for which the instant application is file) and Station KQTE are both located in the Victor Valley radio market. As reflected in the attached FCC Geographic Market study, the market has 37 stations. Under Section 73.3555 of the FCC's rules, a single entity may own or operate up to 7 stations not more than 4 of which are in the same service. Since Mr. Chang has two AMs in the market this ownership complies with the FCC's rules.

## FCC Geographic Market Definition for Victor Valley, CA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designn Date	Mkt Rank	Owner		
KATJ	FM	100.7	C	Country	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	George, CA	San Bernardino	
KBTW	FM	104.5	C	Mexican	Victor Valley, CA	07/02/2003	112	Lazer Broadcasting Corporation	Lenwood, CA	San Bernardino	
KCDZ	FM	107.7	C	HotAC/New	Victor Valley, CA	07/02/2003	112	Morongo Basin Broadcasting	Twenty-nine Palms, CA	San Bernardino	
KCLZ	FM	95.5	C	Rock	Victor Valley, CA	07/02/2003	112	Alpha Media	Twenty-nine Palms Bas, CA	San Bernardino	
KDGL	FM	106.9	C	Clsc Hlts	Victor Valley, CA	06/15/2006	112	Alpha Media	Yucca Valley, CA	San Bernardino	
KDUC	FM	94.3	C	CHR/Rhythc	Victor Valley, CA	07/02/2003	112	Dos Costas Communications Corp	Barstow, CA	San Bernardino	
KDUQ	FM	102.5	C	CHR/Rhythc	Victor Valley, CA	07/02/2003	112	Dos Costas Communications Corp	Ludlow, CA	San Bernardino	
KFLG	FM	94.7	C	Country	Victor Valley, CA	07/03/2007	112	Cameron Broadcasting Inc	Big River, CA	San Bernardino	
KHDR	FM	96.9	C	Rock	Victor Valley, CA	07/02/2003	112	HefTel Broadcasting Company LLC	Lenwood, CA	San Bernardino	
KHMJ	FM	95.1	C	Mexican	Victor Valley, CA	12/08/2014	112	Hispanic Target Media	Trona, CA	San Bernardino	
KHMS	FM	88.5	NC	ChrsContem	Victor Valley, CA	07/02/2003	112	Faith Communications Corporation	Victorville, CA	San Bernardino	
KHRQ	FM	94.9	C	Rock	Victor Valley, CA	07/02/2003	112	HefTel Broadcasting Company LLC	Baker, CA	San Bernardino	
KHWY	FM	98.9	C	Hot AC	Las Vegas, NV	03/24/2009	29	HefTel Broadcasting Company LLC	Essex, CA	San Bernardino	
KHYZ	FM	99.7	C	Hot AC	Las Vegas, NV	03/24/2009	29	HefTel Broadcasting Company LLC	Mountain Pass, CA	San Bernardino	
KIHT	FM	104.7	C	DARK	Victor Valley, CA	09/02/2016	112	Point Broadcasting Company	Amboy, CA	San Bernardino	
KIQQ	FM	103.7	C	Span/AdHts	Victor Valley, CA	07/02/2003	112	Lazer Broadcasting Corporation	Newberry Springs, CA	San Bernardino	
KIXA	FM	106.5	C	Clsc Rock	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	Lucerne Valley, CA	San Bernardino	
KIXF	FM	101.5	C	Country	Victor Valley, CA	07/02/2003	112	HefTel Broadcasting Company LLC	Baker, CA	San Bernardino	
KIXW	AM	960	C	Talk	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	Apple Valley, CA	San Bernardino	
KIXW	FM	107.3	C	Country	Victor Valley, CA	07/02/2003	112	HefTel Broadcasting Company LLC	Lenwood, CA	San Bernardino	
KJVV	FM	101.9	C	DARK	Victor Valley, CA	10/02/2014	112	Virtues Communications Network LLC	Twenty-nine Palms, CA	San Bernardino	
KKZI	AM	1310	C	DARK	Victor Valley, CA	07/02/2003	112	Chang Broadcasting	Barstow, CA	San Bernardino	
KLXD	FM	89.5	NC	Chrs/Althv	Victor Valley, CA	07/02/2003	112	Educational Media Foundation	Victorville, CA	San Bernardino	
KMPS	AM	910	C	Mexican	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	Hesperia, CA	San Bernardino	
KNWH	AM	1250	C	News/Talk	Victor Valley, CA	07/02/2003	112	Alpha Media	Yucca Valley, CA	San Bernardino	
KODV	FM	89.1	NC	Span/Cctm	Victor Valley, CA	07/06/2005	112	Ondas de Vida Network	Barstow, CA	San Bernardino	
KOTE	AM	1450	C	Sports	Victor Valley, CA	06/29/2011	112	Chang Broadcasting	Helendale, CA	San Bernardino	
KRXV	FM	98.1	C	Hot AC	Victor Valley, CA	07/02/2003	112	HefTel Broadcasting Company LLC	Yermo, CA	San Bernardino	
KSZL	AM	1230	C	Talk	Victor Valley, CA	07/02/2003	112	Dos Costas Communications Corp	Barstow, CA	San Bernardino	
KVTR	AM	1590	C	Mexican	Victor Valley, CA	07/02/2003	112	RUDex Broadcasting Limited	Victorville, CA	San Bernardino	
KWVE	FM	101.3	C	Rhythc/Olde	Victor Valley, CA	06/14/2016	112	Point Five LLC	Barstow, CA	San Bernardino	
KWRN	AM	1550	C	Mexican	Victor Valley, CA	07/02/2003	112	Lazer Broadcasting Corporation	Apple Valley, CA	San Bernardino	
KXCM	FM	96.3	C	Country	Victor Valley, CA	07/02/2003	112	Copper Mountain Broadcasting Company	Joshua Tree, CA	San Bernardino	
KXVV	FM	103.1	C	Mexican	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	Victorville, CA	San Bernardino	

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

## FCC Geographic Market Definition for Victor Valley, CA

Call Letters	AM/ FM	Freq	Station	Type Format	Home Market	Market		Owner	City & State of License		County of License
						Designth Date	Home Mkt Rank				
KXXZ	FM	95.9	C	Mexican	Victor Valley, CA	07/02/2003	112	Dos Costas Communications Corp	Barstow, CA	San Bernardino	
KYZA	FM	92.7	NC	Chrs/Altve	Victor Valley, CA	07/24/2003	112	Educational Media Foundation	Adelanto, CA	San Bernardino	
KZXY	FM	102.3	C	Hot AC	Victor Valley, CA	07/02/2003	112	Frontier Radio Management Inc	Apple Valley, CA	San Bernardino	

Number of Stations in Geographic Market **37**

### Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed