

Engineering Statement

In Support of an Application for a Construction Permit

KVST(FM), Channel 279C, La Porte, Texas

General

Cumulus Licensing LLC (“Cumulus”), the proposed assignee of radio station KVST(FM), La Porte, Texas, is filing in the instant application to relocate KVST’s transmitter location (as well as the associated changes in elevation). This application is filed contingently with KBIU in Lake Charles, Louisiana. KBIU will downgrade from a class C1 to C2 and change its channel from 279 to 277.

Exhibits Explained

Exhibit E, Figure 1 is a channel spacing study that demonstrates that once the proposed modification to KBIU is made, KVST (on channel 279C) will be fully spaced to all other broadcast facilities. The proposed spacing to KBIU’s modified facility is shown on this exhibit.

Exhibit E, Figure 2 shows the height above average terrain and the distances to the F(50,50) 70 and 60 dBu contours. The results of this exhibit are shown in map form in Exhibit E, Figure 3.

Exhibit E, Figure 4 is a vertical sketch that demonstrates all pertinent elevations as they relate to the proposed construction of KVST at this new site.

When evaluating the effects of human exposure to radiofrequency radiation, Worksheet #1A demonstrates that 100 kW (horizontal and vertical) at 595 meters AGL poses no exposure issues. The result of the worksheet is a power density of $19.0 \mu\text{W}/\text{cm}^2$, which is below the controlled and uncontrolled guidelines.

Exhibit E, Figure 5 is a portion of the Whites Bayou, Texas USGS 7.5-minute topographic map that clearly shows the proposed coordinates for KVST.

Environmental Impact
(No Exhibits)

A grant of the proposed construction would not constitute a major action as defined in the Commission's Rules and Regulations.

During operation, the facility will produce no chemical or significant thermal pollution, and no ionizing radiation will be generated. Areas of high intensity radiofrequency fields will be confined to the immediate area of the transmitting antenna, far above the ground and away from any human and wildlife population.

The area is not officially designated as a wilderness area or wildlife preserve and is not pending consideration. The area has no significant value in American history, architecture, archaeology, or culture, which is listed in the Register of Historic Places, and it is not eligible for listing. It is not recognized either nationally or locally for special scenic or recreational value. Cumulus proposes to locate KVST on a new tower.

Conclusion

This statement/application has been prepared for Cumulus by utilizing the latest available information, cross-checked with the Federal Communications Commission and other sources. Therefore, it is submitted that the proposed is in compliance with the Commission's Rules and Regulations and other sources. Therefore, it is submitted that the engineering data compiled and demonstrated herein for the proposed is in compliance with Commission's Rules and Regulations at the time of this application's filing date.

We welcome the opportunity to discuss with the staff of the Federal Communications

Commission the engineering data contained in this application. Should any questions arise concerning the information, please contact Reynolds Technical Associates.

The following pages are exhibits prepared and assembled in support of the proposed.

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Statement of the Consultants

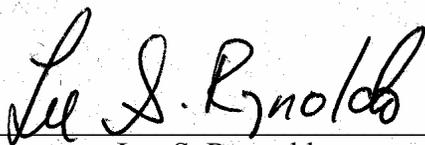
The instant engineering statement was prepared for Cumulus Licensing LLC and supports an application for a construction permit of KVST(FM), La Porte, Texas. It was developed by Reynolds Technical Associates (“RTA”) and may not be used for purposes other than submission to the Commission by Cumulus.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

It is prepared for The Applicant under contractual agreement, and its certification by RTA is used accordingly. If The Applicant fails in its contractual obligation, RTA reserves the right to withdraw its certification.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For RTA:

A handwritten signature in black ink that reads "Lee S. Reynolds". The signature is written in a cursive style and is positioned above a horizontal line.

Lee S. Reynolds

February 3rd, 2004

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