

ENGINEERING REPORT COVERING
REQUEST FOR CONSTRUCTION PERMIT
ON BEHALF OF ROSE CITY RADIO CORPORATION
FOR STATION KMPC (AM) 1540 KILOHERTZ
LOS ANGELES, CALIFORNIA

DECEMBER 2003

ENGINEERING REPORT COVERING
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FOR STATION KMPC(AM) 1540 KILOHERTZ
LOS ANGELES, CALIFORNIA

SUMMARY

The engineering exhibit of which this statement is part was prepared on behalf of Rose City Radio Corporation, hereinafter referred to as "Rose City", in support of an application for construction permit for AM station KMPC Los Angeles, California. Rose City is the licensee of KMPC. KMPC operates on 1540 kilohertz with power of 50 kilowatts daytime and 10 kilowatts nighttime employing a dual mode directional antenna system. This application proposes minor changes in the KMPC antenna system. Specifically, Rose City seeks to establish a new directional antenna system for the daytime and nighttime operation and increase nighttime power to 40 kilowatts. The existing three tower array will be dismantled and a six tower array will be erected. No other changes are proposed.

DAYTIME ALLOCATION CONSIDERATIONS

The geographic area encompassed by the KMPC daytime allocation study is vast and as a consequence, a conventional allocation map would be hard to read. Accordingly, two maps which provide greater allocation detail in critical areas, are provided in lieu of a conventional map.

An area of prohibited 0.5 and 0.25 mv/m contour overlap exists between the presently licensed KMPC operation and first adjacent channel station KWRN Apple Valley, California. The proposed KMPC operation will reduce the overlap area for both stations. Figure 3 is a detailed allocation mapping which shows the reduced interference area.

A small area of prohibited 5 mv/m contour overlap exists with second adjacent channel station KVTM Port Hueneme, California. As can be seen on Figure 3, the proposed KMPC operation will totally eliminate this overlap.

KMPC also has prohibited co-channel contour overlap with Mexican station XE Ensenada, Baja California Norte and first adjacent channel XEBG Tijuana, Baja California Norte. The FCC has not accepted either of these facilities and has filed an objection with Mexico. As was the case with the nighttime allocation situation, in order to expedite the processing of this application, the KMPC daytime proposal does not increase radiation in the overlap areas beyond what is presently authorized for either station. Figure 4 is a detailed allocation mapping of KMPC, XE and XEBG. The radiation proposed is slightly less than what is authorized. Therefore, XE and XEBG are fully protected.

CRITICAL HOURS ALLOCATION CONSIDERATIONS

KMPC currently protects co-channel Class A station KXEL Waterloo, Iowa during the critical hours. Since the proposed KMPC daytime antenna system does not increase radiation toward KXEL, it can be safely concluded that the proposed KMPC operation will continue to protect KXEL.

NIGHTTIME ALLOCATION CONSIDERATIONS

The protected RSS nighttime limits of any legally qualifying North American station will not be increased by this proposal. The presently licensed facilities result in KMPC being a 50% RSS contributor to two domestic and one international stations. The domestic stations are first adjacent channel KYCY San Francisco, California and co-channel KREA Honolulu, Hawaii. Section 73.182(q) of the rules, footnote 1, requires that the KMPC nighttime proposal decrease its RSS contribution by 10% toward these stations. The proposed KMPC directional antenna system design reduces the RSS toward the KYCY licensed facilities by 10.3%, toward a pending KYCY application by 15.4%, and toward KREA by 15.1%. It should be noted that KMPC's presently licensed facilities are the sole contributor to the KREA 50% RSS. The amount of the contribution is 1.995 mv/m. Section 73.182(q) limits protection to 2 mv/m. Therefore, even though the radiation was reduced, a 10% reduction is not required toward KREA.

The international station for which KMPC is presently a 50% RSS contributor is co-channel XEHOS Villa De Seris, Sonoma, Mexico. The US treaty with Mexico prohibits existing radiation to be increased when a station is a 50% RSS contributor. The FCC has not accepted this station

and has filed an objection with Mexico. In order to expedite the processing of this application, the KMPC proposal does not increase radiation toward XEHOS beyond what is presently authorized. Actually, the radiation proposed is decreased by 3.8%. Therefore, XEHOS is fully protected. The presently licensed facilities also result in KMPC being a 25% contributor to co-channel station KXPA Bellevue, Washington. Section 73.182(q) of the rules, footnote 1, requires that the KMPC night proposal not increase radiation toward these stations. The proposed KMPC nighttime reduces radiation toward KXPA by 0.7%. Tables 5 - 7 provide RSS allocation study data for the licensed and proposed KMPC operations for KYCY and KXPA.

TECHNICAL DATA AND EXHIBITS

Figures 1 and 2 are polar plots of the proposed KMPC antenna patterns. Tables 1 and 2 are tabulations of the daytime horizontal radiation values with appropriate distance to contour computations. Tables 3 and 4 are tabulations of pertinent nighttime vertical radiation values and appropriate distance to contour computations.

A map of the city of license service contours for the existing and proposed KMPC daytime and nighttime operation is not provided since the proposed patterns maintain or increase radiation in all directions toward the city of license, Los Angeles, California. The KMPC nighttime interference free contour has been determined to be 8.78 mv/m.

The combined footprint of the presently licensed KMPC day/night 1000 mv/m contour was compared to the combined footprint of the 1000 mv/m contour for the KMPC day/night proposal.

The results of the comparison indicate that the proposed KMPC day/night operation will reduce the total 1000 mv/m area by 9.3 % and reduce the affected population by 10.2 %.

ANSI RADIATION GUIDELINES

A study of the proposed facility was conducted with respect to standards set forth in FCC Bulletin OST Number 65, Edition 97-01, regarding human exposure to radiofrequency radiation. The study evaluated the proposed KMPC antenna system and was based on data provided in Tables 2 and 3 of Supplement A, "Predicted Distances for Compliance with FCC Limits". Based on Tables 2 and 3, a distance of 4 meters from the tower would have to be observed to achieve ANSI radiofrequency compliance.

When it is necessary for workers to be within the hazard area near the towers, an appropriate power reduction or temporary cessation of broadcasting will be implemented. Access to the towers will be prevented by a fence with a locked gate. Signs, warning of a RF hazard, will be conspicuously posted at the site.

DECLARATION

The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Pittstown, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his own knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

Charles A. Hecht
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(908) 730-7959
December 8, 2003

CHARLES A. HECHT & ASSOCIATES, INC.
BROADCAST ENGINEERING CONSULTANTS

TABLE 1
DISTANCES TO DAYTIME CONTOURS
KMPC 1540 KILOHERTZ 50 KW DA
ROSE CITY RADIO CORPORATION
LOS ANGELES, CALIFORNIA

Azimuth (deg)	1 km Field (mV/m)	Segment		1000	5.00	0.50	0.25	.025
		Conductivity-Distance	*measured	mV/m (km)	mV/m (km)	mV/m (km)	mV/m (km)	mV/m (km)
0.0	721.	8-14.3, 4-45.5, 8-62, 4-101,		0.65	21.2	51.6	71.4	180.
5.0	619.	8-13.9, 4-43.6, 8-72.9, 4-370		0.57	20.0	48.3	66.5	174.
10.0	564.	8-13.7, 4-42.5, 8-85.4, 4-358		0.52	19.3	46.4	63.6	171.
15.0	567.	8-13.5, 4-41.8, 8-99.9, 4-345		0.52	19.3	46.5	64.0	173.
20.0	622.	8-13.5, 4-41.4, 8-115, 4-330		0.57	19.9	48.3	67.3	181.
25.0	707.	8-13.6, 4-41.4, 8-135, 4-136,		0.64	20.9	50.9	71.8	191.
30.0	799.	8-13.8, 4-41.7, 8-158,		0.72	21.9	53.6	76.3	199.
35.0	883.	8-14.1, 4-43.1, 8-184,		0.79	22.8	56.0	79.8	205.
40.0	948.	8-14.5, 4-44.9, 8-328,		0.84	23.5	57.8	82.1	209.
45.0	992.	8-15, 4-47.3, 8-309,		0.88	24.1	59.1	83.3	212.
50.0	1016	8-15.8, 4-50.3, 8-289,		0.90	24.5	59.9	83.5	212.
55.0	1027	8-16.7, 4-54.2, 8-268,		0.90	25.0	60.5	82.9	212.
60.0	1034	8-17.9, 4-59.2, 8-251,		0.91	25.4	61.1	82.0	212.
65.0	1052	8-19.4, 4-67.2, 8-239,		0.92	26.1	62.0	82.0	211.
70.0	1091	8-21.5, 4-78.8, 8-224,		0.96	27.1	63.6	83.9	211.
75.0	1160	8-24.7, 4-95.1, 8-205,		1.01	28.7	66.2	87.0	212.
80.0	1257	8-30.3, 4-118, 8-176,		1.09	31.2	70.1	91.5	214.
85.0	1376	8-39.5, 4-115, 2-9.7, 8-163,		1.18	32.8	75.1	97.3	219.
90.0	1506	8-56.2, 4-91.2, 2-36.8, 8-126,		1.28	34.0	82.0	105.	223.
95.0	1634	8-66.6, 4-74.1, 2-70.6,						
		8-22.9,		1.37	35.2	87.0	111.	223.
100.0	1748	8-82.1, 4-59.8, 2-62.7, 15-295		1.46	36.3	92.7	117.	236.
105.0	1833	8-90.9, 4-68.2, 2-32.5, 15-265		1.52	37.0	96.2	121.	251.
110.0	1878	8-103, 4-85.7, 15-225,		1.55	37.4	98.6	124.	263.
115.0	1871	8-116, 4-95.9, 15-134,		1.55	37.3	98.5	127.	260.
120.0	1804	8-131, 4-110, 15-62.3,		1.50	36.8	97.0	128.	255.
125.0	1674	8-152, 4-121,		1.40	35.6	94.1	124.	252.
130.0	1485	8-176, 4-73.7,		1.26	33.8	89.6	119.	248.
135.0	1255	8-28.9, 15-80.4, 8-96.6,						
		4-25.9, 3-214,		1.08	32.7	101.	130.	257.
140.0	1026	8-17.1, 15-142, 8-59, 3-282		0.90	34.7	98.8	131.	257.
145.0	896.	8-12.2, 15-76.4, 5000-60.6,						
		15-57.9, 3-293		0.80	34.8	119.	172.	284.
150.0	985.	8-9.5, 15-56, 5000-113, 15-.7,						
		5000-23.4, 3-30.3,						
		5000-6.7, 3-27.4, 5000-1.9,						
		3-9.9, 5000-15, 3-206		0.87	37.7	206.	223.	341.
155.0	1291	8-7.9, 15-49.6, 5000-443		1.11	43.6	313.	427.	824.
160.0	1714	8-6.7, 15-40.3, 5000-453		1.43	64.1	413.	529.	929.
165.0	2182	8-5.9, 15-34.2, 5000-460		1.76	133.	490.	606.	1007
170.0	2656	8-5.3, 15-30.5, 5000-464		2.08	182.	544.	662.	1064
175.0	3108	8-4.9, 15-30.2, 5000-465		2.38	209.	575.	693.	1097
180.0	3522	8-4.5, 15-30, 5000-465		2.63	230.	599.	718.	1122
185.0	3883	8-4.3, 15-30.9, 5000-465		2.85	242.	614.	732.	1137

CHARLES A. HECHT & ASSOCIATES, INC.
BROADCAST ENGINEERING CONSULTANTS

TABLE 1
-2-
DISTANCES TO CONTOURS
KMPC LOS ANGELES, CALIFORNIA

190.0	4181	8-4.1, 15-35.4, 5000-461	3.02	233.	606.	725.	1131
195.0	4408	8-3.9, 15-36.4, 5000-460	3.15	237.	611.	730.	1137
200.0	4559	8-3.8, 15-36.3, 5000-460	3.23	243.	618.	737.	1144
205.0	4629	8-3.7, 15-36.6, 5000-460	3.27	245.	620.	739.	1146
210.0	4619	8-3.6, 15-36.8, 5000-460	3.26	244.	619.	738.	1145
215.0	4528	8-3.6, 15-28.6, 5000-468	3.21	280.	654.	773.	1180
220.0	4361	8-3.6, 15-27, 5000-469	3.12	281.	655.	774.	1180
225.0	4124	8-3.6, 15-25.7, 5000-471	2.99	278.	651.	770.	1175
230.0	3828	8-3.7, 15-24.6, 5000-472	2.81	271.	642.	761.	1166
235.0	3488	8-3.7, 15-23.8, 5000-472	2.61	260.	629.	747.	1152
240.0	3127	8-3.8, 15-23.2, 5000-473	2.39	246.	612.	730.	1134
245.0	2780	8-4, 15-22.8, 5000-473	2.17	230.	593.	711.	1114
250.0	2493	8-4.2, 15-23.8, 5000-472	1.98	209.	570.	687.	1090
255.0	2320	8-4.5, 15-25.4, 5000-470	1.86	191.	550.	667.	1069
260.0	2303	8-4.8, 15-27.4, 5000-468	1.85	179.	538.	655.	1056
265.0	2439	8-5.2, 15-33.4, 5000-5.4, 8-15.5, 5000-440	1.94	57.4	403.	520.	922.
270.0	2679	8-5.8, 15-26.5, 8-39.2, 5000-429	2.10	52.1	304.	421.	824.
275.0	2961	8-91.5, 5000-408	2.28	45.3	198.	315.	719.
280.0	3231	8-99, 5000-401	2.45	47.0	188.	306.	710.
285.0	3450	8-115, 5000-32.5, 8-85.7, 5000-267	2.59	48.3	149.	186.	504.
290.0	3591	8-106, 4-56.9, 8-73.8, 5000-263	2.67	49.2	123.	154.	414.
295.0	3642	8-88.1, 4-99.3, 8-58.9, 5000-254	2.70	49.5	120.	151.	381.
300.0	3596	8-75.8, 4-138, 8-65.8, 5000-220	2.68	49.2	117.	147.	316.
305.0	3461	8-67, 4-155, 8-137,	2.59	48.4	113.	143.	289.
310.0	3248	8-60.4, 4-138, 8-184,	2.46	47.1	109.	139.	285.
315.0	2975	8-55.4, 4-84.2, 8-273,	2.29	45.4	104.	133.	286.
320.0	2664	8-51.5, 4-71.6, 8-61, 15-7.6, 8-286,	2.09	43.3	99.3	128.	281.
325.0	2337	8-48.5, 4-68.4, 8-49, 15-58.3, 8-178,	1.87	41.0	93.9	122.	276.
330.0	2015	8-20.6, 4-11.1, 8-14.4, 4-73.4, 8-54.3, 15-76.2, 8-127,	1.65	33.7	84.8	110.	261.
335.0	1716	8-18.8, 4-15.5, 8-9.9, 4-83.8, 8-94.1, 15-58.4,	1.43	30.7	77.9	102.	240.
340.0	1448	8-17.4, 4-20.4, 8-2.3, 4-41.4, 8-10.4, 4-48.7, 8-105,	1.23	28.5	70.5	95.3	224.
345.0	1218	8-16.3, 4-55.1, 8-28.4, 4-79.6, 8-52.5,	1.06	26.4	64.7	89.9	209.
350.0	1022	8-15.4, 4-51, 8-39.5, 4-112,	0.90	24.5	60.0	83.5	197.
355.0	857.	8-14.8, 4-47.9, 8-51.2, 4-106,	0.77	22.8	55.6	77.2	188.

Date 12-08-03 Site Coordinates: 34-04-43 N 118-11-05 W
Curve Number 19 Conductivity File KMPC
Frequency 1540 khz DA Parameter File KMPCDPS

TABLE 2
ROSE CITY RADIO CORPORATION
AM BROADCAST STATION KMPC
LOS ANGELES, CALIFORNIA
1540 KHZ 40 KW, 50 KW-LS U DA-2

DAYTIME STANDARD RADIATION PATTERN DATA
(Radiation Values at One Kilometer)

TOWER Number	Field Ratio	Phase (deg)	Spacing (deg)	Bearing (deg)	Height (deg)
1	0.906	+113.6	0.0	0.0	110.0
2	1.000	+0.0	88.9	233.5	110.0
3	0.435	-159.7	184.7	235.0	110.0
4	0.251	-48.4	137.1	170.0	110.0
5	0.582	+154.6	186.6	195.9	110.0
6	0.225	+71.1	257.1	210.0	110.0
Input Power (kW)	Loop Loss (ohms)	Theoretical RMS (mV/m)	Q RSS (mV/m)	Q Factor (mV/m)	Standard RMS (mV/m)
50.0	1.00	2401.	3390.	84.8	2523.

TABLE 3
ROSE CITY RADIO CORPORATION
AM BROADCAST STATION KMPC
LOS ANGELES, CALIFORNIA
1540 KHZ 40 KW, 50 KW-LS U DA-2

NIGHTTIME STANDARD RADIATION PATTERN DATA
(Radiation Values at One Kilometer)

TOWER Number	Field Ratio	Phase (deg)	Spacing (deg)	Bearing (deg)	Height (deg)
1	0.621	+135.8	0.0	0.0	110.0
2	1.000	+0.0	88.9	233.5	110.0
3	0.573	-130.6	184.7	235.0	110.0
4	0.346	-48.2	137.1	170.0	110.0
5	0.639	-170.5	186.6	195.9	110.0
6	0.340	+48.2	257.1	210.0	110.0
Input Power (kW)	Loop Loss (ohms)	Theoretical RMS (mV/m)	RSS (mV/m)	Q Factor (mV/m)	Standard RMS (mV/m)
40.0	1.00	2229.	3453.	86.3	2342.

TABLE 3
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NIGHTTIME STANDARD RADIATION PATTERN DATA
KMPC LOS ANGELES, CALIFORNIA

Azimuth Angle (deg)	STANDARD RADIATION (at One Kilometer)						
	-----Elevation Angle in Degrees-----						
	0	5	10	15	20	25	30
	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)
0	714.	710.	700.	682.	656.	622.	578.
5	669.	668.	663.	654.	638.	614.	580.
10	586.	587.	590.	591.	588.	578.	558.
15	479.	483.	492.	505.	516.	523.	519.
20	361.	367.	383.	407.	433.	455.	468.
25	247.	255.	276.	309.	348.	385.	413.
30	155.	162.	185.	223.	270.	319.	360.
35	106.	109.	122.	156.	206.	263.	313.
40	106.	101.	96.5	115.	162.	221.	276.
45	116.	108.	92.5	96.4	136.	194.	251.
50	112.	105.	90.0	92.8	130.	184.	239.
55	100.	96.3	91.1	103.	140.	189.	237.
60	106.	106.	112.	131.	165.	205.	243.
65	144.	147.	156.	173.	198.	227.	254.
70	200.	202.	208.	219.	234.	250.	266.
75	253.	253.	255.	258.	263.	268.	273.
80	290.	289.	286.	283.	279.	276.	272.
85	302.	300.	295.	287.	278.	270.	261.
90	286.	284.	278.	269.	260.	250.	240.
95	247.	245.	241.	234.	227.	220.	213.
100	196.	196.	194.	192.	189.	187.	183.
105	160.	160.	161.	161.	161.	161.	158.
110	164.	164.	162.	159.	154.	148.	140.
115	193.	191.	184.	174.	159.	143.	125.
120	211.	207.	196.	179.	156.	130.	104.
125	200.	195.	183.	163.	138.	110.	84.6
130	186.	182.	173.	159.	143.	129.	119.
135	269.	268.	263.	256.	248.	240.	231.
140	487.	485.	477.	464.	446.	424.	398.
145	803.	798.	780.	752.	713.	666.	612.
150	1195.	1184.	1153.	1103.	1037.	956.	864.
155	1643.	1627.	1580.	1505.	1404.	1283.	1147.
160	2131.	2109.	2044.	1939.	1801.	1636.	1452.
165	2637.	2609.	2525.	2391.	2213.	2002.	1768.
170	3144.	3109.	3007.	2842.	2625.	2367.	2082.
175	3630.	3590.	3469.	3276.	3021.	2719.	2385.

TABLE 3
-3-
NIGHTTIME STANDARD RADIATION PATTERN DATA
KMPC LOS ANGELES, CALIFORNIA

STANDARD RADIATION (at One Kilometer)						
Azimuth Angle (deg)	-----Elevation Angle in Degrees-----					
	35 (mV/m)	40 (mV/m)	45 (mV/m)	50 (mV/m)	55 (mV/m)	60 (mV/m)
0	525.	465.	400.	333.	267.	205.
5	536.	482.	420.	354.	286.	221.
10	526.	483.	428.	365.	299.	232.
15	502.	471.	425.	369.	305.	240.
20	467.	449.	415.	366.	308.	244.
25	427.	423.	399.	359.	306.	246.
30	387.	394.	381.	349.	301.	245.
35	350.	367.	362.	336.	294.	241.
40	319.	342.	343.	323.	286.	237.
45	296.	322.	327.	310.	277.	231.
50	282.	307.	312.	298.	267.	224.
55	275.	297.	300.	286.	257.	216.
60	273.	289.	290.	275.	246.	208.
65	274.	283.	280.	263.	235.	198.
70	276.	277.	269.	251.	223.	188.
75	274.	269.	257.	237.	210.	178.
80	266.	257.	242.	222.	197.	167.
85	252.	240.	225.	206.	182.	155.
90	231.	219.	205.	188.	167.	142.
95	205.	196.	184.	169.	150.	130.
100	178.	171.	161.	148.	134.	117.
105	153.	146.	138.	128.	117.	104.
110	131.	122.	113.	107.	100.	93.7
115	108.	95.6	88.6	86.9	87.4	86.6
120	82.1	69.2	68.5	75.6	83.2	86.6
125	67.8	65.7	75.2	87.0	95.1	96.9
130	116.	119.	123.	126.	125.	118.
135	222.	213.	201.	187.	170.	149.
140	369.	337.	302.	265.	227.	188.
145	552.	488.	423.	358.	294.	234.
150	765.	663.	561.	462.	369.	284.
155	1003.	856.	712.	575.	450.	338.
160	1258.	1062.	872.	695.	534.	394.
165	1521.	1274.	1037.	817.	620.	451.
170	1784.	1486.	1200.	937.	704.	506.
175	2036.	1688.	1356.	1053.	785.	559.

TABLE 3
-4-
NIGHTTIME STANDARD RADIATION PATTERN DATA
KMPC LOS ANGELES, CALIFORNIA

Azimuth Angle (deg)	STANDARD RADIATION (at One Kilometer)						
	Elevation Angle in Degrees						
	0	5	10	15	20	25	30
	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)
180	4080.	4033.	3896.	3677.	3387.	3044.	2664.
185	4475.	4423.	4272.	4029.	3709.	3330.	2911.
190	4803.	4748.	4584.	4322.	3977.	3568.	3116.
195	5053.	4994.	4822.	4546.	4181.	3749.	3272.
200	5216.	5156.	4977.	4691.	4314.	3867.	3373.
205	5288.	5226.	5045.	4755.	4372.	3917.	3416.
210	5264.	5202.	5022.	4733.	4351.	3899.	3400.
215	5144.	5084.	4908.	4626.	4253.	3810.	3323.
220	4933.	4875.	4706.	4435.	4078.	3655.	3188.
225	4634.	4580.	4421.	4168.	3833.	3436.	2999.
230	4256.	4207.	4062.	3830.	3524.	3161.	2761.
235	3814.	3770.	3642.	3435.	3164.	2841.	2486.
240	3325.	3287.	3177.	3000.	2766.	2489.	2183.
245	2815.	2784.	2693.	2546.	2353.	2124.	1870.
250	2322.	2297.	2225.	2109.	1956.	1773.	1570.
255	1903.	1884.	1828.	1738.	1618.	1474.	1313.
260	1638.	1622.	1575.	1499.	1398.	1276.	1138.
265	1588.	1571.	1522.	1444.	1340.	1215.	1077.
270	1726.	1706.	1647.	1552.	1428.	1281.	1120.
275	1954.	1929.	1857.	1741.	1591.	1414.	1222.
280	2179.	2150.	2066.	1932.	1757.	1553.	1332.
285	2346.	2314.	2221.	2074.	1882.	1659.	1417.
290	2424.	2391.	2294.	2141.	1941.	1708.	1456.
295	2402.	2369.	2273.	2121.	1922.	1691.	1441.
300	2279.	2248.	2157.	2013.	1825.	1607.	1370.
305	2065.	2037.	1956.	1827.	1658.	1461.	1248.
310	1778.	1754.	1686.	1576.	1433.	1265.	1083.
315	1440.	1422.	1367.	1281.	1167.	1034.	888.
320	1078.	1065.	1026.	963.	882.	785.	679.
325	722.	713.	689.	651.	600.	540.	472.
330	413.	410.	399.	382.	360.	332.	300.
335	266.	265.	262.	257.	251.	241.	228.
340	372.	370.	362.	351.	334.	314.	291.
345	531.	527.	514.	494.	467.	433.	395.
350	649.	644.	629.	605.	573.	532.	485.
355	709.	705.	691.	668.	636.	596.	547.

TABLE 3
-5-
NIGHTTIME STANDARD RADIATION PATTERN DATA
KMPC LOS ANGELES, CALIFORNIA

Azimuth Angle (deg)	STANDARD RADIATION (at One Kilometer)					
	-----Elevation Angle in Degrees-----					
	35	40	45	50	55	60
	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)
180	2269.	1875.	1501.	1159.	859.	607.
185	2474.	2040.	1628.	1252.	924.	649.
190	2645.	2177.	1733.	1329.	977.	683.
195	2774.	2281.	1813.	1388.	1017.	709.
200	2859.	2348.	1864.	1425.	1043.	725.
205	2894.	2376.	1885.	1440.	1053.	731.
210	2880.	2364.	1875.	1432.	1046.	727.
215	2815.	2311.	1834.	1401.	1024.	712.
220	2701.	2219.	1762.	1347.	987.	687.
225	2543.	2091.	1663.	1274.	935.	654.
230	2345.	1932.	1540.	1183.	872.	612.
235	2115.	1747.	1397.	1078.	799.	564.
240	1863.	1545.	1242.	964.	719.	512.
245	1604.	1338.	1082.	847.	637.	458.
250	1355.	1139.	929.	733.	558.	405.
255	1141.	966.	795.	633.	485.	356.
260	992.	842.	694.	554.	426.	314.
265	930.	783.	639.	505.	385.	281.
270	952.	787.	630.	487.	362.	258.
275	1024.	832.	652.	492.	356.	245.
280	1106.	888.	686.	508.	358.	238.
285	1171.	933.	714.	522.	361.	235.
290	1200.	953.	726.	527.	361.	230.
295	1186.	941.	715.	517.	352.	222.
300	1129.	895.	681.	492.	334.	209.
305	1030.	818.	623.	451.	306.	190.
310	896.	715.	546.	396.	269.	168.
315	739.	592.	455.	332.	227.	142.
320	569.	460.	357.	264.	183.	117.
325	402.	331.	263.	200.	144.	96.8
330	265.	228.	191.	154.	120.	88.4
335	212.	193.	171.	147.	121.	95.9
340	265.	237.	207.	176.	145.	115.
345	353.	309.	265.	221.	179.	139.
350	433.	377.	321.	265.	212.	164.
355	491.	430.	367.	304.	243.	186.

TABLE 4
DISTANCES TO NIGHTTIME CONTOURS
ROSE CITY RADIO CORPORATION
KMPC 1540 KILOHERTZ 40 KW DA
LOS ANGELES, CALIFORNIA

Azimuth (deg)	1 km Field (mV/m)	Segment Conductivity-Distance (mS/m) - (km) *measured	1000 mV/m (km)	8.78 mV/m (km)
0.0	714.	8-14.3, 4-45.5,	0.65	17.4
5.0	669.	8-13.9, 4-43.6,	0.61	16.9
10.0	586.	8-13.7, 4-42.5,	0.54	16.0
15.0	479.	8-13.5, 4-41.8,	0.44	14.9
20.0	361.	8-13.5, 4-41.4,	0.34	13.5
25.0	247.	8-13.6,	0.24	11.0
30.0	155.	8-13.8,	0.15	8.32
35.0	106.	8-14.1,	0.10	6.54
40.0	106.	8-14.5,	0.10	6.53
45.0	116.	8-15,	0.11	6.91
50.0	112.	8-15.8,	0.11	6.78
55.0	100.	8-16.7,	0.10	6.30
60.0	106.	8-17.9,	0.10	6.52
65.0	144.	8-19.4,	0.14	7.97
70.0	200.	8-21.5,	0.19	9.72
75.0	253.	8-24.7,	0.24	11.1
80.0	290.	8-30.3,	0.27	12.0
85.0	302.	8-39.5,	0.29	12.3
90.0	286.	8-56.2,	0.27	11.9
95.0	247.	8-66.6,	0.24	11.0
100.0	196.	8-82.1,	0.19	9.61
105.0	160.	8-90.9,	0.15	8.50
110.0	164.	8-103,	0.16	8.63
115.0	193.	8-116,	0.19	9.52
120.0	211.	8-131,	0.20	10.0
125.0	200.	8-152,	0.19	9.71
130.0	186.	8-176,	0.18	9.30
135.0	269.	8-28.9,	0.26	11.5
140.0	487.	8-17.1,	0.45	15.8
145.0	803.	8-12.2, 15-76.4,	0.72	24.1
150.0	1195	8-9.5, 15-56,	1.04	31.4
155.0	1643	8-7.9, 15-49.6,	1.38	37.6
160.0	2131	8-6.7, 15-40.3,	1.73	42.8
165.0	2637	8-5.9, 15-34.2, 5000-460	2.07	83.9
170.0	3144	8-5.3, 15-30.5, 5000-464	2.40	128.
175.0	3630	8-4.9, 15-30.2, 5000-465	2.70	152.
180.0	4080	8-4.5, 15-30, 5000-465	2.96	171.

TABLE 4
-2-
DISTANCES TO CONTOURS
KMPC LOS ANGELES, CALIFORNIA

185.0	4475	8-4.3, 15-30.9, 5000-465	3.18	181.
190.0	4803	8-4.1, 15-35.4, 5000-461	3.36	171.
195.0	5053	8-3.9, 15-36.4, 5000-460	3.50	174.
200.0	5216	8-3.8, 15-36.3, 5000-460	3.58	180.
205.0	5288	8-3.7, 15-36.6, 5000-460	3.62	182.
210.0	5264	8-3.6, 15-36.8, 5000-460	3.61	180.
215.0	5144	8-3.6, 15-28.6, 5000-468	3.55	215.
220.0	4933	8-3.6, 15-27, 5000-469	3.43	217.
225.0	4634	8-3.6, 15-25.7, 5000-471	3.27	213.
230.0	4256	8-3.7, 15-24.6, 5000-472	3.06	205.
235.0	3814	8-3.7, 15-23.8, 5000-472	2.81	193.
240.0	3325	8-3.8, 15-23.2, 5000-473	2.51	176.
245.0	2815	8-4, 15-22.8, 5000-473	2.19	155.
250.0	2322	8-4.2, 15-23.8, 5000-472	1.86	127.
255.0	1903	8-4.5, 15-25.4, 5000-470	1.57	95.9
260.0	1638	8-4.8, 15-27.4, 5000-468	1.38	68.8
265.0	1588	8-5.2, 15-33.4,	1.34	38.0
270.0	1726	8-5.8, 15-26.5, 8-39.2,	1.44	37.0
275.0	1954	8-91.5,	1.60	29.9
280.0	2179	8-99,	1.76	31.3
285.0	2346	8-115,	1.88	32.3
290.0	2424	8-106,	1.93	32.8
295.0	2402	8-88.1,	1.92	32.7
300.0	2279	8-75.8,	1.83	32.0
305.0	2065	8-67,	1.68	30.6
310.0	1778	8-60.4,	1.48	28.7
315.0	1440	8-55.4,	1.23	26.2
320.0	1078	8-51.5,	0.95	23.0
325.0	722.	8-48.5,	0.65	19.1
330.0	413.	8-20.6,	0.39	14.5
335.0	266.	8-18.8,	0.25	11.4
340.0	372.	8-17.4,	0.35	13.7
345.0	531.	8-16.3, 4-55.1,	0.49	16.4
350.0	649.	8-15.4, 4-51,	0.59	17.2
355.0	709.	8-14.8, 4-47.9,	0.64	17.5

Date 12-08-03
Curve Number 19
Frequency 1540

Site Coordinates 34-04-43 N 118-11-05 W
Conductivity File KMPC
DA Parameter File KMPCNP3

TABLE 5
Existing AM Nighttime Allocation Study
KXPA Bellevue, Washington
Coordinates 47-35-29 N 122-10-56 W
Frequency 1540 khz
Power 5.00 kw
Inverse Field 706.8 mV/m

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
KKAD	1550	US	VANCOUVER	WA	218	B	296	6.6	1333	33.0	47.2	834	0.268837	4.482	4.482	4.482
KXEL	1540	US	WATERLOO	IA	2412	A	2421	294.7	3987	0.0	0.2	3987	0.004938	3.939	5.967	5.967
KFBK	1530	US	SACRAMENTO	CA	974	A	974	356.9	4895	6.2	11.6	4512	0.041972	3.788	7.067	7.067
KMPC	1540	US	LOS ANGELES	CA	1539	B	1552	348.7	627	1.9	5.4	626	0.020061	2.512	0.000	7.500
XEHOS1540	MX	VILLA DE SERIS	SO	2275	B	2284	338.1	338.1	786	0.0	0.9	786	0.010122	2.703	0.000	0.000
KRPI	1550	US	FERNDALE	WA	143	B	246	167.3	364	44.9	58.9	205	0.343580	1.406	0.000	0.000

Proposed AM Nighttime Allocation Study
KXPA Bellevue, Washington

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
KKAD	1550	US	VANCOUVER	WA	218	B	296	6.6	1333	33.0	47.2	834	0.268837	4.482	4.482	4.482
KXEL	1540	US	WATERLOO	IA	2412	A	2421	294.7	3987	0.0	0.2	3987	0.004938	3.939	5.967	5.967
KFBK	1530	US	SACRAMENTO	CA	974	A	974	356.9	4895	6.2	11.6	4512	0.041972	3.788	7.067	7.067
KMPC	1540	US	LOS ANGELES	CA	1539	B	1552	348.7	623	1.9	5.4	622	0.020061	2.495	0.000	7.495
XEHOS1540	MX	VILLA DE SERIS	SO	2275	B	2284	338.1	338.1	786	0.0	0.9	786	0.010122	2.703	0.000	0.000
KRPI	1550	US	FERNDALE	WA	143	B	246	167.3	364	44.9	58.9	205	0.343580	2.233	0.000	0.000

TABLE 6
Existing AM Nighttime Allocation Study
KYCY San Francisco, California
Coordinates 37-31-49 N 122-16-29 W
Frequency 1550 khz
Power 10.00 kw
Inverse Field 965.6 mV/m

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
XEBG	1550	MX	TIJUANA	BN	735	B	762	320.8	353	9.4	16.3	344	0.073173	5.037	0.000	0.000
KNZR	1560	US	BAKERSFIELD	CA	380	A	429	311.5	1276	19.9	31.3	986	0.167945	3.313	3.313	3.313
KMPC	1540	US	LOS ANGELES	CA	532	B	569	317.3	1415	13.9	23.0	1285	0.112668	2.895	4.400	4.400
KXEX	1550	US	FRESNO	CA	225	B	301	292.8	50.9	32.1	46.2	50.7	0.273499	2.773	5.201	5.201
KWRN	1550	MX	APPLE AVLLEY	CA	568	B	602	307.4	111	12.9	21.5	103	0.103526	2.140	0.000	5.624
KMRI	1550	US	WEST VALLEY C	UT	951	B	971	251.4	199	6.5	12.0	196	0.047225	1.850	0.000	5.920
KSFT	1550	US	ST. JOSEPH	MO	2394	B	2403	273.0	1057	0.0	0.3	1057	0.008290	1.752	0.000	6.174
XERUV1550		MX	JALAPA	VC	3165	A	3171	314.5	1131	0.0	0.0	1131	0.007099	1.606	0.000	0.000

Proposed AM Nighttime Allocation Study
KYCY San Francisco, California

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
XEBG	1550	MX	TIJUANA	BN	735	B	762	320.8	353	9.4	16.3	344	0.073173	5.037	0.000	0.000
KNZR	1560	US	BAKERSFIELD	CA	380	A	429	311.5	1276	19.9	31.3	986	0.167945	3.313	3.313	3.313
KXEX	1550	US	FRESNO	CA	225	B	301	292.8	50.9	32.1	46.2	50.7	0.273499	2.773	4.320	4.320
KMPC	1540	US	LOS ANGELES	CA	532	B	569	317.3	1273	13.9	23.0	1153	0.112668	2.597	5.041	5.041
KWRN	1550	MX	APPLE AVLLEY	CA	568	B	602	307.4	111	12.9	21.5	103	0.103526	2.140	0.000	5.476
KMRI	1550	US	WEST VALLEY C	UT	951	B	971	251.4	199	6.5	12.0	196	0.047225	1.850	0.000	5.780
KSFT	1550	US	ST. JOSEPH	MO	2394	B	2403	273.0	1057	0.0	0.3	1057	0.008290	1.752	0.000	6.040
XERUV1550		MX	JALAPA	VC	3165	A	3171	314.5	1131	0.0	0.0	1131	0.007099	1.606	0.000	6.250
KKAD	1550	US	VANCOUVER	WA	903	B	925	178.7	157	7.0	12.8	153	0.049757	1.526	0.000	0.000

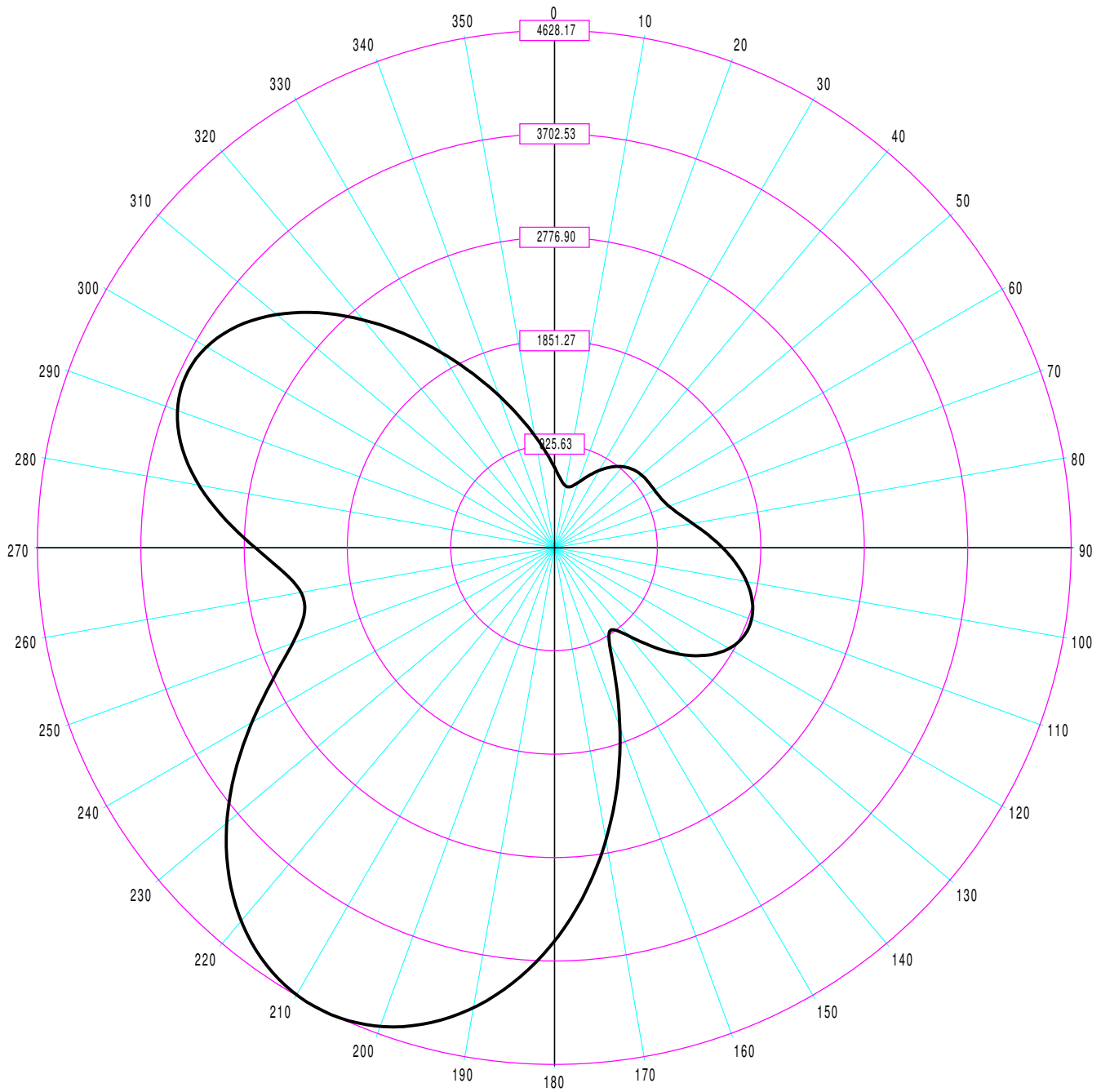
TABLE 7
Existing AM Nighttime Allocation Study
Application KYCY San Francisco, California
Coordinates 37-31-49 N 122-16-29 W
Frequency 1550 khz
Power 15.00 kw
Inverse Field 1266 mV/m

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
XEBG	1550	MX	TIJUANA	BN	690	B	718	322.0	353	10.2	17.5	343	0.079957	5.479	0.000	0.000
KNZR	1560	US	BAKERSFIELD	CA	333	A	389	312.7	1322	22.6	34.9	954	0.192805	3.678	3.678	3.678
KMPC	1540	US	LOS ANGELES	CA	486	B	526	318.7	1386	15.4	25.1	1232	0.126064	3.106	4.814	4.814
KXEX	1550	US	FRESNO	CA	179	B	268	290.3	46.1	38.5	52.8	45.4	0.318956	2.896	5.618	5.618
KWRN	1550	MX	APPLE AVLLEY	CA	521	B	558	307.7	109	14.3	23.5	101	0.115763	2.326	0.000	6.080
KMRI	1550	US	WEST VALLEY C	UT	925	B	946	249.0	199	6.8	12.4	196	0.049393	1.932	0.000	6.380
KSFT	1550	US	ST. JOSEPH	MO	2361	B	2370	272.2	1027	0.0	0.4	1027	0.008579	1.762	0.000	6.619
XERUV	1550	MX	JALAPA	VC	3118	A	3124	314.6	1131	0.0	0.0	1131	0.007341	1.661	0.000	6.824
KRPI	1550	US	FERNDAL	WA	1284	B	1299	176.9	280	3.5	7.6	279	0.026138	1.459	0.000	0.000

Proposed AM Nighttime Allocation Study
Application KYCY San Francisco, California

CALL	FRQ	COUNTRY	CITY	ST	DIST	CLASS	SLANT DIST	AZIMUTH	GND RAD	MIN ELEV	MAX ELEV	MAX RAD	SWAVE FLD	LIMIT	50% RSS	25% RSS
XEBG	1550	MX	TIJUANA	BN	690	B	718	322.0	353	10.2	17.5	343	0.079957	5.479	0.000	0.000
KNZR	1560	US	BAKERSFIELD	CA	333	A	389	312.7	1322	22.6	34.9	954	0.192805	3.678	3.678	3.678
KXEX	1550	US	FRESNO	CA	179	B	268	290.3	46.1	38.5	52.8	45.4	0.318956	2.896	4.681	4.681
KMPC	1540	US	LOS ANGELES	CA	486	B	526	318.7	1175	15.4	25.1	1042	0.126064	2.627	5.368	5.368
KWRN	1550	MX	APPLE AVLLEY	CA	521	B	558	307.7	109	14.3	23.5	101	0.115763	2.326	0.000	5.850
KMRI	1550	US	WEST VALLEY C	UT	925	B	946	249.0	199	6.8	12.4	196	0.049393	1.932	0.000	6.161
KSFT	1550	US	ST. JOSEPH	MO	2361	B	2370	272.2	1027	0.0	0.4	1027	0.008579	1.762	0.000	6.408
XERUV	1550	MX	JALAPA	VC	3118	A	3124	314.6	1131	0.0	0.0	1131	0.007341	1.661	0.000	6.620
KRPI	1550	US	FERNDAL	WA	1284	B	1299	176.9	280	3.5	7.6	279	0.026138	1.459	0.000	0.000

FIGURE 1 DA-D



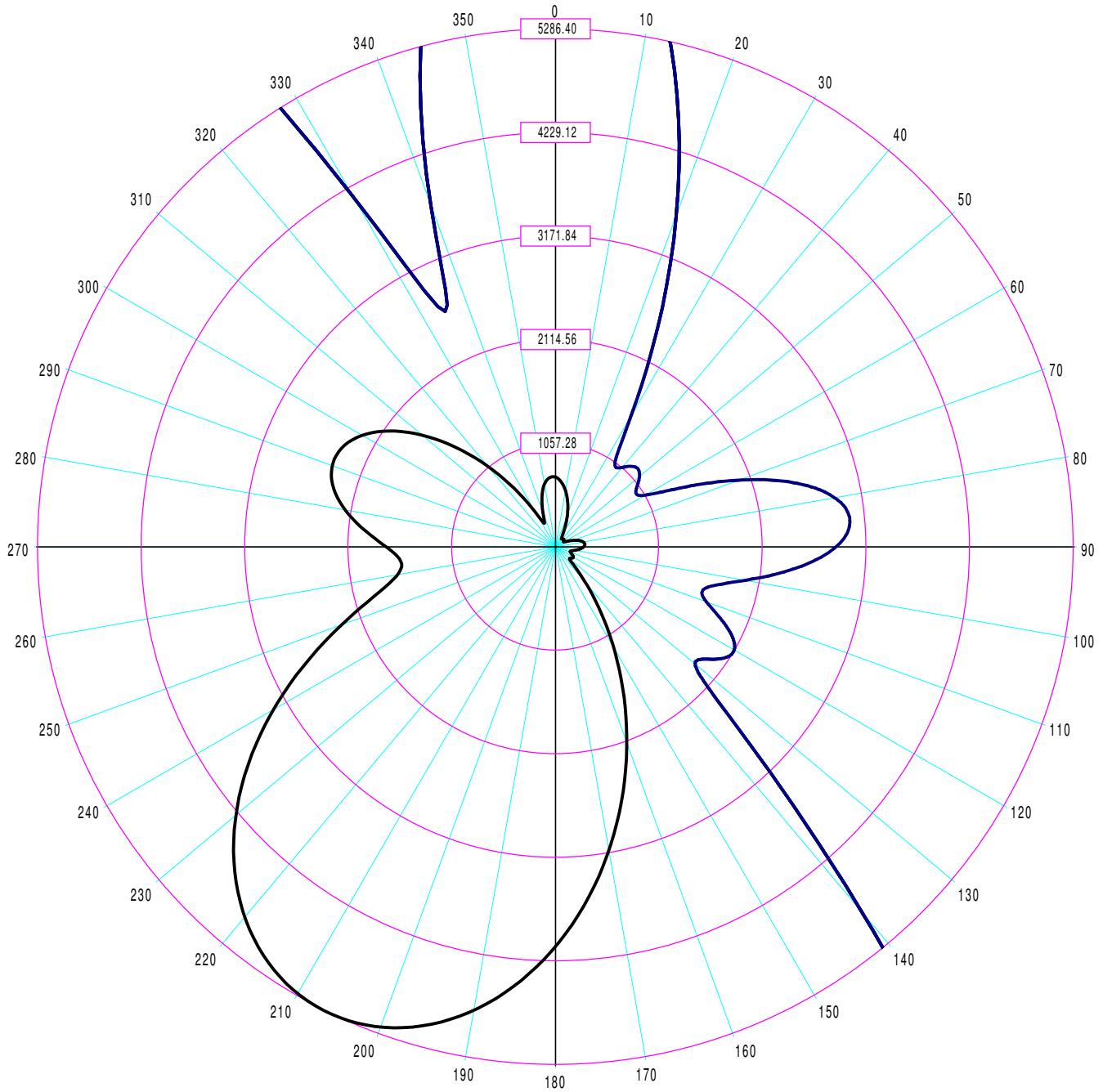
CHARLES A. HECHT & ASSOCIATES, INC. - DECEMBER 2003

Callsign	: KMPC	T#	Field	Phase	Spacing	Orientation	Height	Top Load	Tower Ref
Frequency	: 1540.00 kHz	1	0.9060	113.60	0.00	0.00	110.00	0.00	0
Power	: 50.00 kw	2	1.0000	0.00	88.90	233.50	110.00	0.00	0
ERSS	: 3390.47 mV/m/km	3	0.4350	200.30	184.70	235.00	110.00	0.00	0
Theoretical Pattern RMS	: 2401.19 mV/m/km	4	0.2510	311.60	137.10	170.00	110.00	0.00	0
Standard Pattern RMS	: 2522.82 mV/m/km	5	0.5820	154.60	186.60	195.90	110.00	0.00	0
Modified Pattern RMS	:	6	0.2250	71.10	257.10	210.00	110.00	0.00	0
Latitude	: 34-04-43.0 N								
Longitude	: 118-11-05.0 W								
Number Augmentations	: 0								

Azim	Field [mV/m]
0.0	720.801
5.0	618.845
10.0	564.053
15.0	567.341
20.0	622.265
25.0	707.061
30.0	799.243
35.0	882.747
40.0	948.216
45.0	992.072
50.0	1015.950
55.0	1026.328
60.0	1033.809
65.0	1051.325
70.0	1090.826
75.0	1159.307
80.0	1256.490
85.0	1375.542
90.0	1505.585
95.0	1633.943
100.0	1747.384
105.0	1832.733
110.0	1877.464
115.0	1870.579
120.0	1803.933
125.0	1674.082
130.0	1485.112
135.0	1254.244
140.0	1025.491
145.0	895.372
150.0	985.242
155.0	1290.853
160.0	1713.633
165.0	2181.813
170.0	2654.973
175.0	3107.545
180.0	3521.282
185.0	3882.389
190.0	4180.329
195.0	4407.244

Azim	Field [mV/m]
200.0	4557.630
205.0	4628.166
210.0	4617.668
215.0	4527.177
220.0	4360.229
225.0	4123.361
230.0	3826.996
235.0	3486.866
240.0	3126.256
245.0	2779.046
250.0	2491.983
255.0	2319.741
260.0	2302.876
265.0	2438.168
270.0	2678.041
275.0	2960.096
280.0	3230.271
285.0	3449.085
290.0	3590.668
295.0	3640.859
300.0	3595.739
305.0	3460.335
310.0	3247.143
315.0	2974.287
320.0	2663.289
325.0	2336.593
330.0	2014.991
335.0	1715.217
340.0	1448.044
345.0	1217.489
350.0	1021.837
355.0	856.885

FIGURE 2 - DA-N



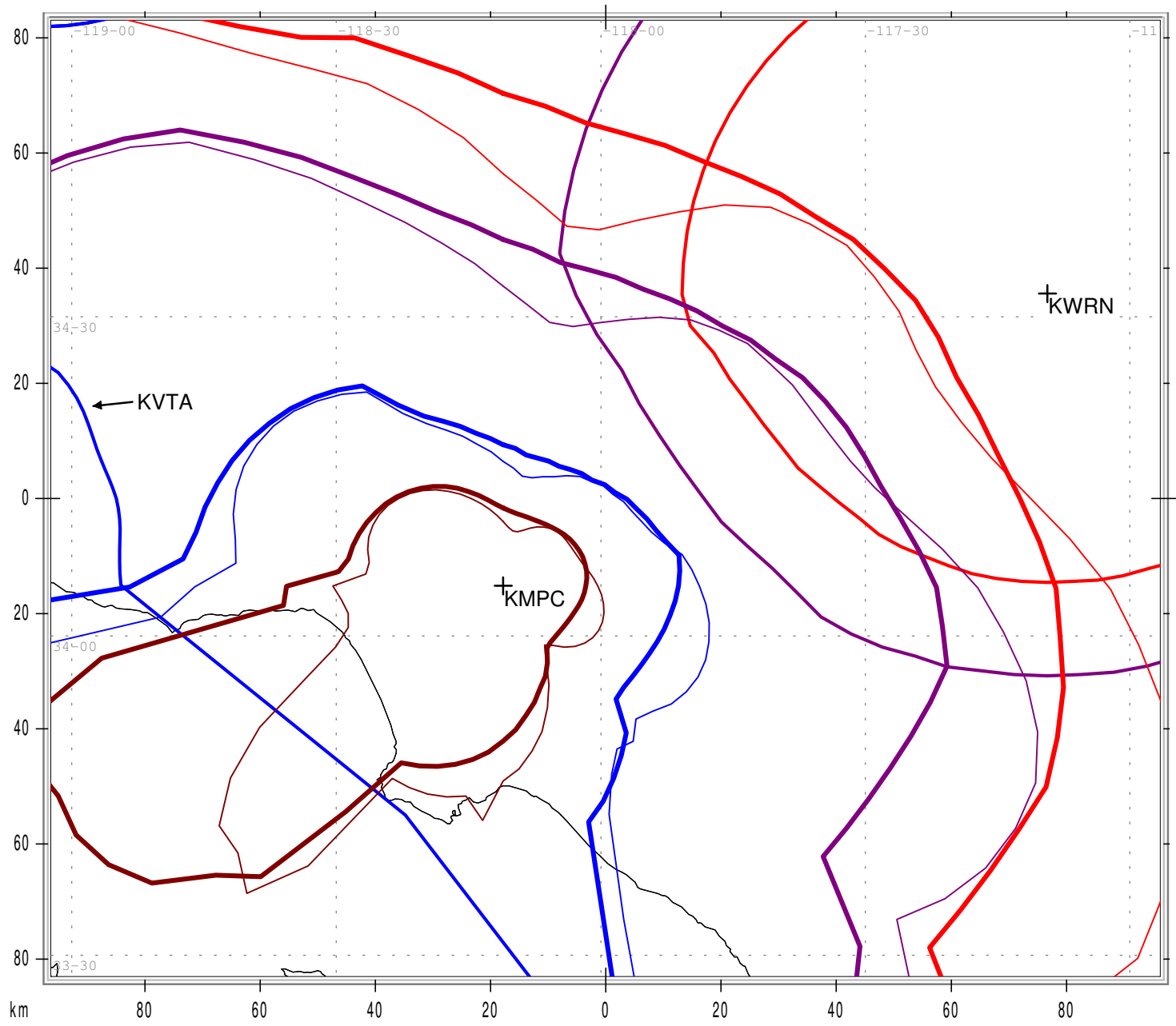
CHARLES A. HECHT & ASSOCIATES, INC. - DECEMBER 2003

Callsign	: KMPC	T#	Field	Phase	Spacing	Orientation	Height	Top Load	Tower Ref
Frequency	: 1540.00 kHz	1	0.6210	135.80	0.00	0.00	110.00	0.00	0
Power	: 40.00 kw	2	1.0000	0.00	88.90	233.50	110.00	0.00	0
ERSS	: 3452.62 mV/m/km	3	0.5730	229.40	184.70	235.00	110.00	0.00	0
Theoretical Pattern RMS	: 2228.76 mV/m/km	4	0.3460	311.80	137.10	170.00	110.00	0.00	0
Standard Pattern RMS	: 2341.95 mV/m/km	5	0.6390	189.50	186.60	195.90	110.00	0.00	0
Modified Pattern RMS	:	6	0.3400	48.20	257.10	210.00	110.00	0.00	0
Latitude	: 34-04-43.0 N								
Longitude	: 118-11-05.0 W								
Number Augmentations	: 0								

Azim	Field [mV/m]	Azim	Field [mV/m]
0.0	713.398	200.0	5215.248
5.0	668.839	205.0	5286.401
10.0	586.358	210.0	5262.498
15.0	478.986	215.0	5143.350
20.0	360.886	220.0	4931.550
25.0	247.029	225.0	4632.661
30.0	154.623	230.0	4255.601
35.0	106.201	235.0	3813.342
40.0	105.990	240.0	3324.173
45.0	115.478	245.0	2814.058
50.0	112.007	250.0	2321.095
55.0	100.411	255.0	1902.671
60.0	105.583	260.0	1637.325
65.0	144.199	265.0	1587.408
70.0	199.984	270.0	1725.900
75.0	252.939	275.0	1953.207
80.0	289.598	280.0	2178.435
85.0	301.706	285.0	2345.277
90.0	286.297	290.0	2423.745
95.0	246.920	295.0	2401.374
100.0	196.204	300.0	2278.340
105.0	159.883	305.0	2064.569
110.0	164.041	310.0	1777.454
115.0	193.021	315.0	1439.741
120.0	210.656	320.0	1077.761
125.0	199.617	325.0	721.366
130.0	185.745	330.0	413.066
135.0	269.218	335.0	265.450
140.0	487.071	340.0	372.139
145.0	803.228	345.0	530.915
150.0	1194.449	350.0	648.564
155.0	1642.880	355.0	709.094
160.0	2130.167		
165.0	2636.863		
170.0	3143.142		
175.0	3629.719		
180.0	4078.655		
185.0	4473.977		
190.0	4802.076		
195.0	5051.939		

FIGURE 3 - DAY ADJACENT CHANNEL ALLOCATION MAP

Where contours of the same color intersect, overlap exists

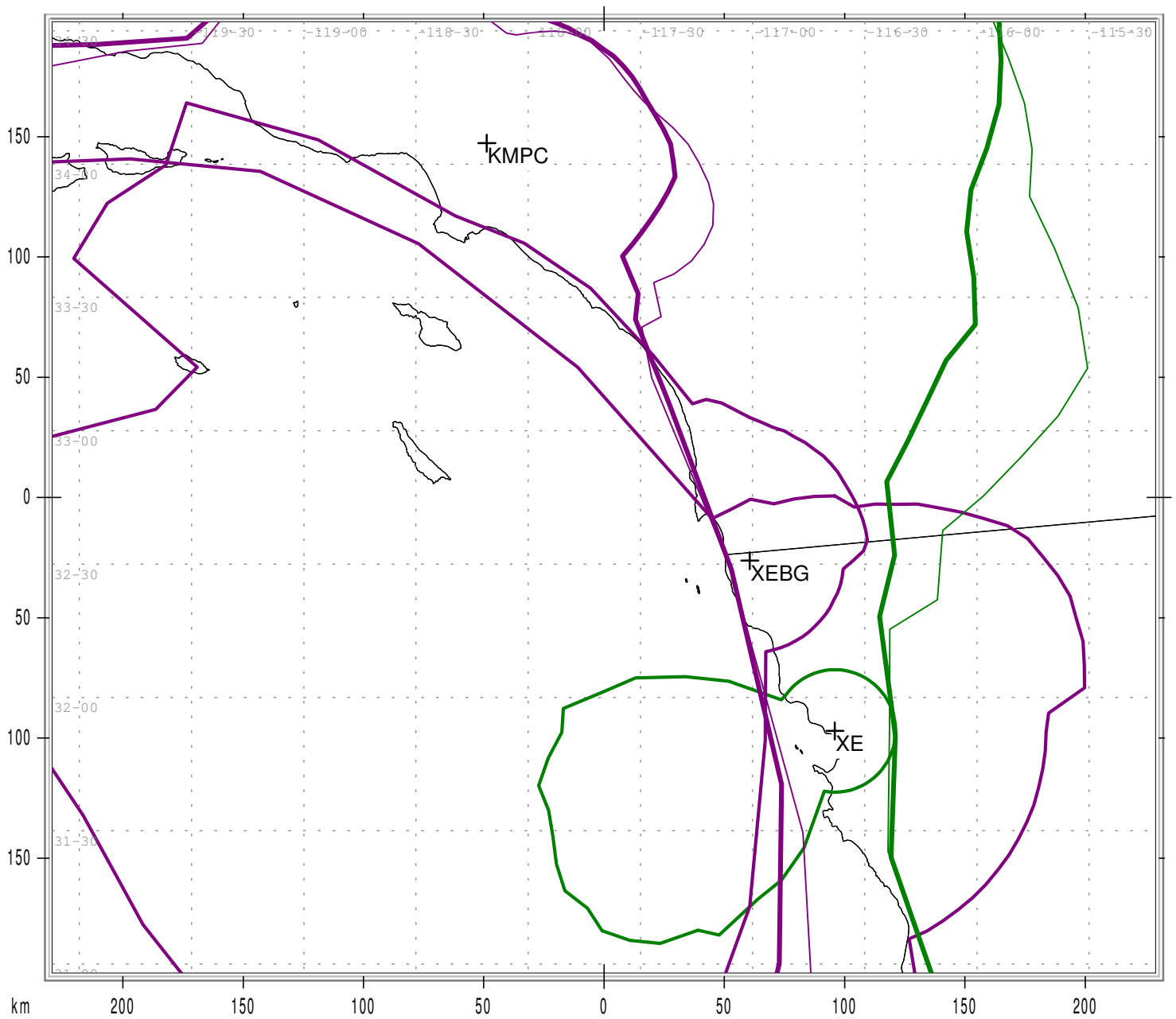


KMPC proposed day pattern shown with thin contours

State Borders Lat/Lon Grid

FIGURE 4 - DAY CO/ADJACENT CHANNEL ALLOCATION MAP

Where contours of the same color intersect, overlap exists



KMPC proposed day pattern shown with thin contours

State Borders Lat/Lon Grid