

Exhibit B-16D

Section 73.213(c) Short-Spacing Analysis

The proposed operation of KOSO is 8 kilometers short-spaced to the licensed operation of first-adjacent-channel station KSKD 227A Chowchilla. The licensed KOSO facility operates as a grandfathered short-spaced station with respect to KSKD under the “prior rules” provisions of §73.213(c)(1). The licensed KOSO facility is 109 km from KSKD, meeting the “prior rules” spacing distance of 105 km. The original KSKD application was filed on September 28, 1988. KOSO and KSKD became short-spaced as a result of the revision of §73.207 in the Second Report and Order in MM Docket No. 88-375.

The instant application proposes continued short-spacing to KSKD under the “prior rules” provisions of §73.213(c)(1). The proposed operation of KOSO is 105 km from the licensed and authorized operations of KSKD.

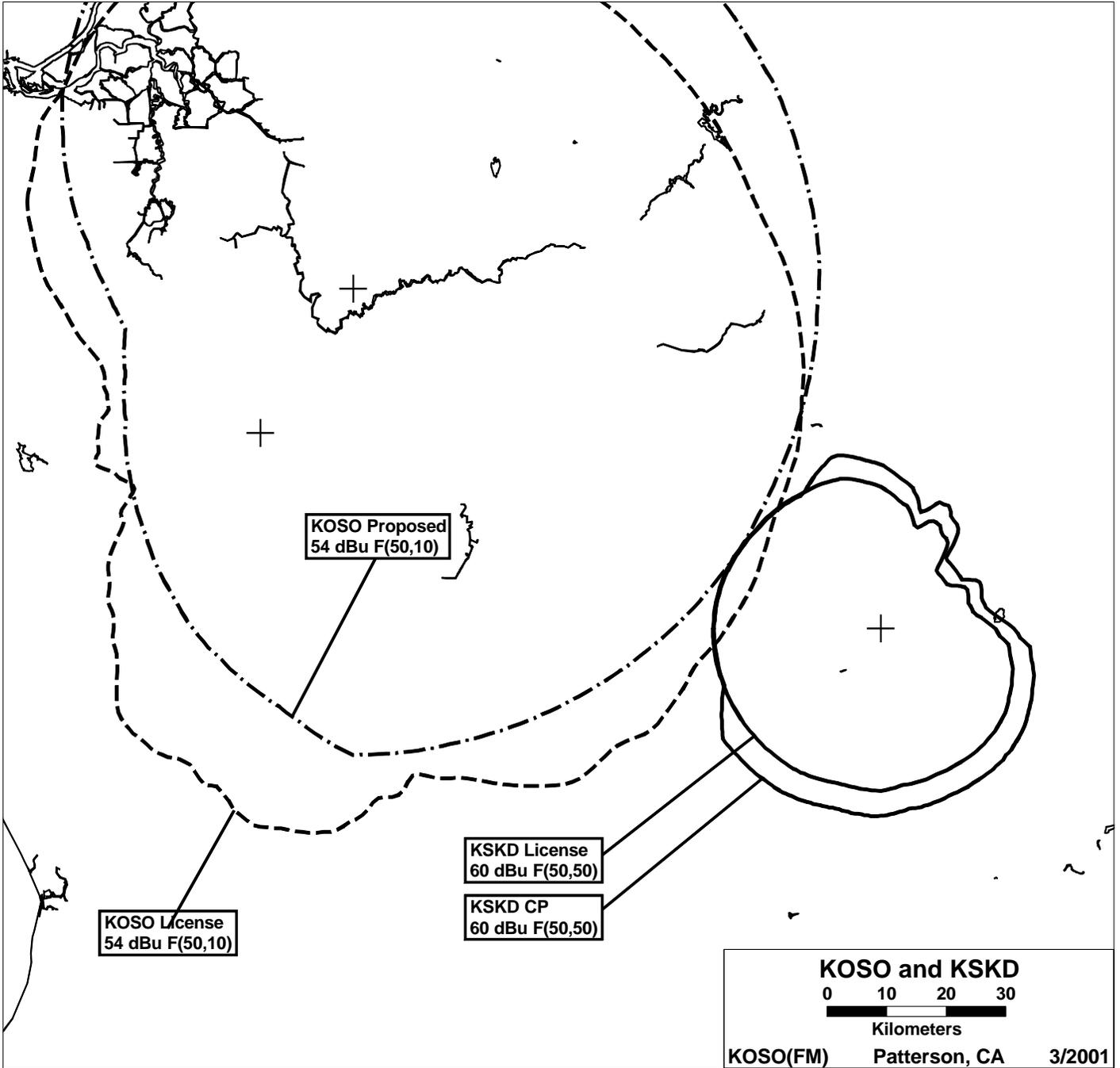
The licensed operation of KSKD (BMLH-19991209ACS) is a 3 kW-equivalent facility. KSKD holds a construction permit (BPH-20000118AEJ) for 6 kW directional operation from its licensed transmitter site. A copy of the KSKD construction permit is attached. The KSKD construction permit was not authorized under the terms of §73.215 of the Commission’s Rules; therefore, the grandfathered short-spacing provisions between KOSO and KSKD are believed to still pertain.

The application underlying the KSKD construction permit BPH-20000118AEJ contained a showing that the 6 kW directional operation of that station would not cause any increased contour overlap to KOSO. (The licensed 3 kW-equivalent operation of KSKD has contour overlap with the licensed operation of KOSO.)

Since a) KOSO and KSKD became short-spaced after November 16, 1964 and prior to October 1, 1989; b) the stations have remained short-spaced since that time; c) neither station is authorized under §73.215; and d) the proposed operation of KOSO meets the “prior rules”

spacing of 105 km to KSKD, it is believed that the proposed operation of KOSO complies with the terms of §73.213(c)(1) with respect to KSKD.

Nevertheless, it is also relevant to point out that the proposed operation of KOSO will not be prejudicial to KSKD. The attached contour map demonstrates that while the KSKD construction permit maintains the contour overlap which the licensed KSKD operation receives from the licensed operation of KOSO, the proposed operation of KOSO will eliminate any such overlap. Therefore, grant of the instant application would serve the public interest.





United States of America
FEDERAL COMMUNICATIONS COMMISSION
FM BROADCAST STATION CONSTRUCTION PERMIT

Official Mailing Address:

EDUCATIONAL MEDIA FOUNDATION
1425 N MARKET BOULEVARD
SACRAMENTO CA 95834

Facility ID: 18858

Call Sign: KSKD-FM

Permit File Number: BPH-20000118AEJ

Authorizing Official:

Dale E. Bickel
Dale E. Bickel

Senior Engineer
Audio Services Division
Mass Media Bureau

Grant Date: FEB 18 2000

This permit expires 3:00 a.m.
local time, February 18, 2003.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Commission rules which became effective on February 16, 1999, have a bearing on this construction permit. See Report & Order, Streamlining of Mass Media Applications, MM Docket No. 98-43, 13 FCC RCD 23056, Para. 77-90 (November 25, 1998); 63 Fed. Reg. 70039 (December 18, 1998). Pursuant to these rules, this construction permit will be subject to automatic forfeiture unless construction is complete and an application for license to cover is filed prior to expiration. See Section 73.3598.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Name of Permittee: EDUCATIONAL MEDIA FOUNDATION

Station Location: CA-CHOWCHILLA

Frequency (MHz):

Channel: 227

Class: A

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: As required to achieve authorized ERP.

Antenna type: (directional or non-directional): Directional

Antenna Coordinates: North Latitude: 37 deg 13 min 2 sec

West Longitude: 120 deg 11 min 56 sec

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW):	6	6
Height of radiation center above ground (Meters):	122	122
Height of radiation center above mean sea level (Meters):	205	205
Height of radiation center above average terrain (Meters):	100	100

Antenna structure registration number: 1024397

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

Special operating conditions or restrictions:

- 1 The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.
- 2 BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee shall submit the results of a complete proof-of-performance to establish the horizontal plane radiation patterns for both the horizontally and vertically polarized radiation components. This proof-of-performance may be accomplished using the complete full size antenna, or individual bays therefrom, mounted on a supporting structure of identical dimensions and configuration as the proposed structure, including all braces, ladders, conduits, coaxial lines, and other appurtenances; or using a carefully manufactured scale model of the entire antenna, or individual bays therefrom, mounted on an equally scaled model of the proposed supporting structure, including all appurtenances. Engineering exhibits should include a description of the antenna testing facilities and equipment employed, including appropriate photographs or sketches and a description of the testing procedures, including scale factor, measurements frequency, and equipment calibration.
- 3 BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee shall submit an affidavit from a licensed surveyor to establish that the directional antenna has been oriented at the proper azimuth.
- 4 BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee/licensee shall submit an affidavit that the installation of the directional antenna system was overseen by a qualified engineer. This affidavit shall include a certification by the engineer that the antenna was installed pursuant to the manufacturer's instructions and list the qualifications of the certifying engineer.

Special operating conditions or restrictions:

- 5 The relative field strength of neither the measured horizontally nor vertically polarized radiation component shall exceed at any azimuth the value indicated on the composite radiation pattern authorized by this construction permit.

A relative field strength of 1.0 on the composite radiation pattern herein authorized corresponds to the following effective radiated power:

6.0 kilowatts.

Principal minima and their associated field strength limits:

250 clockwise to 330 degrees = 3.00 kW

*** END OF AUTHORIZATION ***