

**MINOR CHANGE/
ONE-STEP APPLICATION
KANZA, INC.
KRLI (FM) RADIO STATION
CH 280C2 - 103.9 MHZ - 12.0 KW
MALTA BEND, MISSOURI
November 2002**

TECHNICAL STATEMENT

This technical statement and attached exhibits were prepared on behalf of Kanza, Inc. ("Kanza"), licensee of KRLI (FM), Channel 280C3, Malta Bend, Missouri.¹ Kanza herein proposes to make minor changes in the facilities of KRLI by increasing the effective radiated power and changing the class of the facility to C2. No other changes are proposed.

The potential for a Class C2 upgrade is based on protecting KJEL, Channel 279C, Lebanon, Missouri, and KBEQ-FM, Channel 282C, Kansas City, Missouri, as Class C0 facilities.² In the Second Report and Order in MM Docket #98-93, a new Class of FM stations was created, Class C0. Pursuant to Note #4, §73.3573, *"A Class C station operating with a height above average terrain ("HAAT") of less than 451 meters is subject to re-classification as a Class C0 station upon the filing of a triggering application for a construction permit that is short-spaced to such Class C station under Section 73.207 but would be fully spaced to such a station as a Class C0 assignment..."* This instant application for KRLI proposes to upgrade the

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- 1) KRLI is presently licensed on Channel 276C3 at Malta Bend, Missouri, but was ordered to Channel 280C3 at Malta Bend, Missouri, in MM Docket #00-129. Kanza has submitted a license modification application, indicating it is now operating KRLI on Channel 280C3, in lieu of Channel 276C3 (BMLH-20021028AAF).
 - 2) An Order to Show Cause regarding the downgrade of KJEL has already been issued in response to a Petition for Rule Making. The licensee of KJEL did not respond to the order and has therefore been deemed to have consented to the downgrade. This instant application requests an Order to Show Cause directed to the licensee of KBEQ-FM and, to the extent necessary, also requests the KJEL downgrade.

station to Channel 280C2, based on both KJEL and KBEQ-FM being considered Class C0 facilities, rather than Class C facilities. As Class C0 facilities, both KJEL and KBEQ-FM are fully spaced to the proposed site of KRLI on Channel 280C2. No other Class C2 channels are available for use at the KRLI site. Therefore, this proposal complies with Note #4 in §73.3573 of the rules.

KI is proposing to remain at the authorized KRLI site. However, during the process of preparing this instant application the ground elevation at the site and geographic coordinates of the tower were found to be at variance with the tower registration for the existing tower. As such, the Federal Aviation Administration has been apprised. Once the revised Determination of No Hazard is issued, the tower registration will be updated. It is noted that the existing KRLI tower structure has been registered with the Commission and assigned Antenna Structure Registration #1007395.

From the proposed KRLI site, Channel 280C2 does not meet the minimum distance separation requirements to two other facilities (aside from the licensed KJEL and KBEQ-FM Class C facilities). Therefore, as denoted on FCC Form 301, Section III-B, an allocation site for Channel 280C2 at Malta Bend is proposed. This allocation site, while still requiring the downgrade of KJEL and KBEQ-FM, meets the Commission's minimum distance separation requirements to all facilities (assuming KJEL and KBEQ-FM as Class C0 stations). The site is not located off-shore or on airport property and is, therefore, suitable for tower construction. Further, a 3.16 mV/m contour from the allocation site will encompass Malta Bend, Missouri.³ Therefore, this proposal meets the Commission's allocation criteria.

3) Based on a maximum Class C2 facility city grade contour radius of 32.6 kilometers (no terrain).

Attached as Exhibit A is a §73.215 review for KRLI based on the actual site proposed for the implementation of Channel 280C2 at Malta Bend, Missouri. All of the remaining exhibits used to certify the information contained in the technical portion of the application has been forwarded to Kanza and are available to the Commission upon request.