

Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

In this case, KBPI and KALC are thus affected. In both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

KALC-Lic has a signal in the area of the proposed FMT of 135.6 dBu. Thus using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules, the proposed 175.6 dBu interference contour would be the area of possible interference. That area extends 1 meter from the proposed FMT site, and that area is fenced off, unpopulated and uninhabited. The only building or structure within that area is the transmitter and equipment building, which is uninhabited.

Similarly KBPI has a signal in the area of the proposed FMT of 134.5 dBu, and as outlined above, the area affected by the proposed FMT (174.5 dBu interference contour) would be uninhabited and unpopulated.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of undesirable to desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

| Minor Change to K292FM | | | | | | | | | | | | |
|--|----------|---------------|-----|--|----------------------------|---------------------------|--------------------|-------------------|------------------------------------|-------------------------|---|------------|
| REFERENCE 39 43 46.0 N. 105 14 08.0 W. | | | CH# | 292D - 106.3 MHz, Pwr= 0.035 kW, HAAT=0.0 M, Average Protected F(50-50)= 4.3 km | | | | | COR= 2241 M | | DISPLAY DATES DATA 02-09-07 SEARCH 02-09-07 | |
| CH CITY | CALL | TYPE STATE | | AZI. <-- | DIST FILE # | LAT. LNG. | Pwr(kW) HAAT(M) | INT(km) COR(M) | PRO(km) LICENSEE | *IN* (Overlap in km) | *OUT* | |
| 294C Denver | KBPI | LIC CO | CN | 346.7 166.7 | 0.41 BLH19851120KC | 39 43 59.0 105 14 12.0 | 100.000 227 | 8.8 2316 | 66.3 Jacor Broadcasting | -12.27*< | -65.97*< | Of Colo |
| 290C Denver | KALC | CP CO | CY | 0.0 180.0 | 0.37 BMPH20020927AAT | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Entercom Denver | -10.63*< | -54.11*< | License, L |
| 294C Denver | KBPI | APP CO | CY | 0.0 180.0 | 0.37 BPH20030424AAP | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Jacor Broadcasting | -10.63*< | -54.11*< | Of Colo |
| 290C Denver | KALC | LIC CO | C | 0.0 180.0 | 0.37 BLH20050602ABO | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Entercom Denver | -10.63*< | -54.11*< | License, L |
| 294C Denver | KBPI | APP CO | CY | 0.0 180.0 | 0.37 BPH20030424AAP | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Jacor Broadcasting | -10.63*< | -54.11*< | Of Colo |
| 294C Denver | KBPI | APP CO | CY | 0.0 180.0 | 0.37 BPH20061116ACX | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Jacor Broadcasting | -10.63*< | -54.11*< | Of Colo |
| 294C Denver | KBPI | APP CO | CY | 0.0 180.0 | 0.37 BPH20030424AAP | 39 43 58.0 105 14 08.0 | 100.000 121 | 6.4 2292 | 54.4 Jacor Broadcasting | -10.63*< | -54.11*< | Of Colo |
| 292C2 Kremmling | KZMV | LIC CO | NHX | 297.3 116.6 | 95.96 BLH20051114AFN | 40 07 12.0 106 14 13.0 | 50.000 159 | 139.0 2695 | 53.4 New Field Broadcasting | -44.02< | 40.40 | LI |
| 292C2 Kremmling | KZMV | RSV CO | | 296.5 115.8 | 105.73 | 40 08 51.0 106 20 49.0 | 50.000 150 | 146.9 2639 | 59.1 New Field Broadcasting | -42.09< | 44.51 | LI |
| 292D Denver | K292FM | LIC CO | DH | 162.8 342.9 | 25.34 BLFT20061226AAA | 39 30 41.0 105 08 54.0 | 0.016 388 | 43.8 2330 | 12.8 Educational Communi | -30.04< | -26.40< | cations |
| 292C2 Widened | KKLI | LIC CO | CN | 163.5 343.8 | 113.96 BLH19901205KE | 38 44 41.0 104 51 46.0 | 1.600 678 | 132.4 2933 | 56.5 Capstar Tx Limited Partner | -29.79< | 19.71 | |
| 292D Boulder | AP0112 | APP CO | C | 0.1 180.1 | 26.12 BNPFT20030317EME | 39 57 53.0 105 14 07.0 | 0.099 -146 | 18.5 1699 | 5.6 Educational Media Foundati | 3.02 | 1.13 | |
| 292D Westminster | AP5994 | APP CO | C | 33.0 213.1 | 32.34 BNPFT20030317HFR | 39 58 24.1 105 01 44.1 | 0.140 19 | 20.4 1674 | 6.1 Radio Assist Ministry, Inc | 7.87 | 6.41 | |
| 292D Empire | KZMV-FM3 | LIC CO | DV | 279.3 99.0 | 45.83 BLFTB20061215AAO | 39 47 42.0 105 45 49.0 | 0.000 841 | 18.5 3818 | 2.5 New Field Broadcasting | 26.88 | 41.31 | LI |
| 292D Fraser | KZMV-7 | APP CO | DV | 296.2 115.8 | 55.23 BNPFTB20070129AE | 39 56 49.0 105 48 57.0 | 0.315 -505 | 25.2 2629 | 7.5 New Field Broadcasting | 29.08 | 45.62 | LI |
| 292D Eagle | KZMV-FM6 | APP CO | DV | 266.7 85.7 | 123.96 BPFTB20070131ADO | 39 39 20.0 106 40 39.0 | 0.920 | 91.3 2841 | 33.8 New Field Broadcasting | 32.27 | 88.58 | LI |
| 292D Longmont | AP1531 | APP CO | DE | 15.0 195.1 | 58.72 BNPFT20030312ACU | 40 14 24.0 105 03 23.0 | 0.000 110 | 4.4 1637 | 1.2 Educational Communi | 49.51 | 36.73 | cations |
| 292C3 Brush | KPRB | RSV CO | | 70.9 252.0 | 156.62 | 40 10 33.0 103 29 49.0 | 25.000 100 | 116.3 1450 | 41.4 Northeast Colorado Broadca | 39.91 | 111.51 | |
| 292D Dillon | KZMV-FM5 | LIC CO | DV | 261.3 80.8 | 70.42 BLFTB20060522ACZ | 39 37 51.0 106 02 47.0 | 1.700 | 28.7 2786 | 8.6 New Field Broadcasting | 41.30 | 60.26 | LI |
| 292C3 Brush | KPRB | CP CO | CX | 70.9 252.0 | 156.62 BPH20020926ACP | 40 10 33.0 103 29 49.0 | 25.000 80 | 112.8 1430 | 38.3 Northeast Colorado Broadca | 43.39 | 114.57 | |
| 292D Estes Park | AP1316 | APP CO | C | 347.1 166.9 | 78.74 BNPFT20030313BES | 40 25 13.0 105 26 39.0 | 0.010 | 29.6 2743 | 8.9 Educational Media Foundati | 45.27 | 56.12 | |
| 292D Greene | AP2603 | APP CO | C | 31.3 211.6 | 87.54 BNPFT20030317BNS | 40 24 04.0 104 41 54.0 | 0.250 | 35.2 1500 | 10.4 Educational Media Foundati | 48.10 | 56.91 | |
| 292D Eagle | KZMV-FM6 | LIC CO | DV | 266.7 85.7 | 123.96 BLFTB20060814AAE | 39 39 20.0 106 40 39.0 | 0.200 | 72.9 2841 | 23.9 New Field Broadcasting | 50.63 | 98.44 | LI |
| 292A Cheyenne | KLEN | LIC WY | NCX | 12.9 193.2 | 150.86 BLH20051114AFQ | 41 03 09.0 104 49 55.0 | 6.000 99 | 93.2 1977 | 33.2 Citicasters Licenses, L.p. | 52.81 | 96.73 | |
| 292D Granby | KZMV-FM1 | CP CO | DC | 300.2 119.8 | 69.16 BPFTB20051114AFR | 40 02 24.0 105 56 11.0 | 0.400 | 9.6 2534 | 3.0 New Field Broadcasting | 58.30 | 63.76 | LI |

| CH CITY | CALL | TYPE STATE | AZI . <-- | DI ST FILE # | LAT. LNG. | Pwr(kW) HAAT(M) | INT(km) COR(M) | PRO(km) LI CENSEE | *IN* (Overl ap i n km) | *OUT* |
|----------------------|----------|---------------|------------------|----------------------------|-----------------------------|--------------------|-------------------|--------------------------------------|---------------------------|---------|
| 292D Granby | KZMV-FM1 | LI C DC CO | 300. 2 119. 8 | 69. 16 BLFTB20040225ABC | 40 02 24. 0 105 56 11. 0 | 0. 400 | 9. 6 2534 | 3. 0 New Fi el d Broadcasting, LI | 58. 30 | 63. 76 |
| 292D Greel ey | AP1581 | APP DE CO | 30. 1 210. 5 | 84. 86 BNPFT20030312AXA | 40 23 19. 0 104 43 56. 0 | 0. 050 | 10. 5 1528 | 3. 3 Educational Communi cations | 70. 00 | 61. 17 |
| 292D Ft. Coll ins | AP1545 | APP DE CO | 3. 1 183. 1 | 84. 95 BNPFT20030312ADN | 40 29 36. 0 105 10 52. 0 | 0. 006 | 1. 6 2078 | 0. 2 Educational Communi cations | 78. 65 | 64. 72 |
| 292A Brush | KPRB | LI C C CO | 67. 0 248. 0 | 142. 23 BLH20010808ABF | 40 13 02. 0 103 41 46. 0 | 3. 000 81 | 67. 1 1401 | 19. 0 Northeast Colorado Broadca | 74. 44 | 117. 64 |

Terrain database is NGDC 30 SEC

ERP and HAAT are on direct line to and from reference station.

"*"affixed to 'IN' or 'Out' values = site inside protected contour. "<" = contour overlap

Terrain and Contour Study

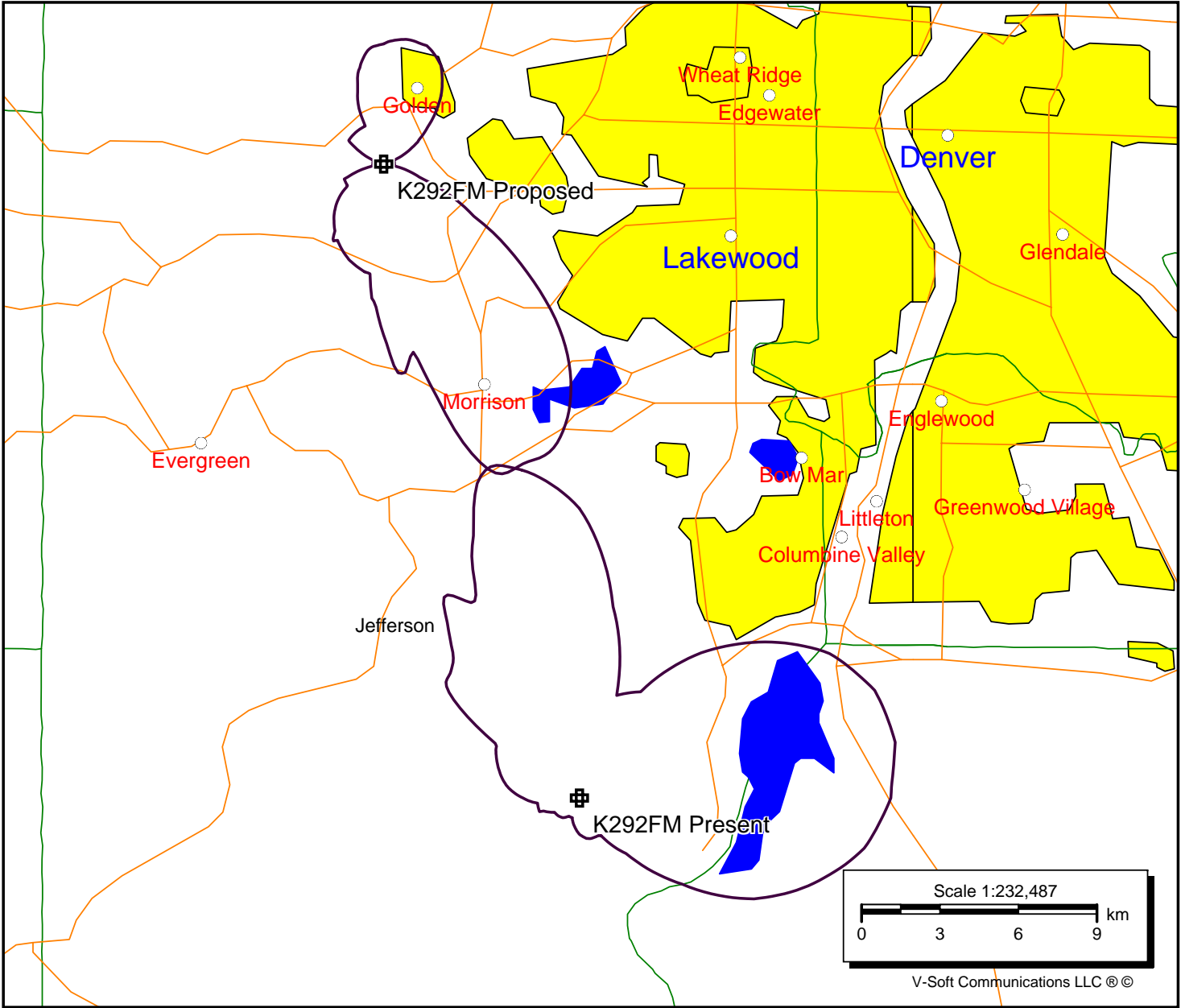
N. Lat. = 39 43 46 W. Lng. = 105 14 08

HAAT and Distance to Contour - FCC Method - 30 Arc. Sec.

| Azi. | AV EL | HAAT | ERP kW | dBk | Field | 60-F5 |
|------|--------|--------|--------|--------|-------|-------|
| 000 | 1843.5 | 397.5 | 0.0006 | -31.95 | 0.135 | 4.58 |
| 030 | 1747.5 | 493.5 | 0.0005 | -32.98 | 0.120 | 4.36 |
| 060 | 1696.3 | 544.7 | 0.0000 | -45.02 | 0.030 | 1.24 |
| 090 | 1718.6 | 522.4 | 0.0000 | -54.56 | 0.010 | 0.41 |
| 120 | 1815.2 | 425.8 | 0.0004 | -33.73 | 0.110 | 3.97 |
| 150 | 1840.5 | 400.5 | 0.0144 | -18.42 | 0.641 | 12.69 |
| 180 | 2172.6 | 68.4 | 0.0350 | -14.56 | 1.000 | 6.51 |
| 210 | 2222.1 | 18.9 | 0.0144 | -18.42 | 0.641 | 3.45 |
| 240 | 2378.5 | -137.5 | 0.0004 | -33.73 | 0.110 | 1.61 |
| 270 | 2249.3 | -8.3 | 0.0000 | -54.56 | 0.010 | 0.41 |
| 300 | 2376.6 | -135.6 | 0.0000 | -45.02 | 0.030 | 1.24 |
| 330 | 2250.2 | -9.2 | 0.0005 | -32.98 | 0.120 | 1.61 |

Ave El= 2025.88 M HAAT= 215.12 M AMSL= 2241

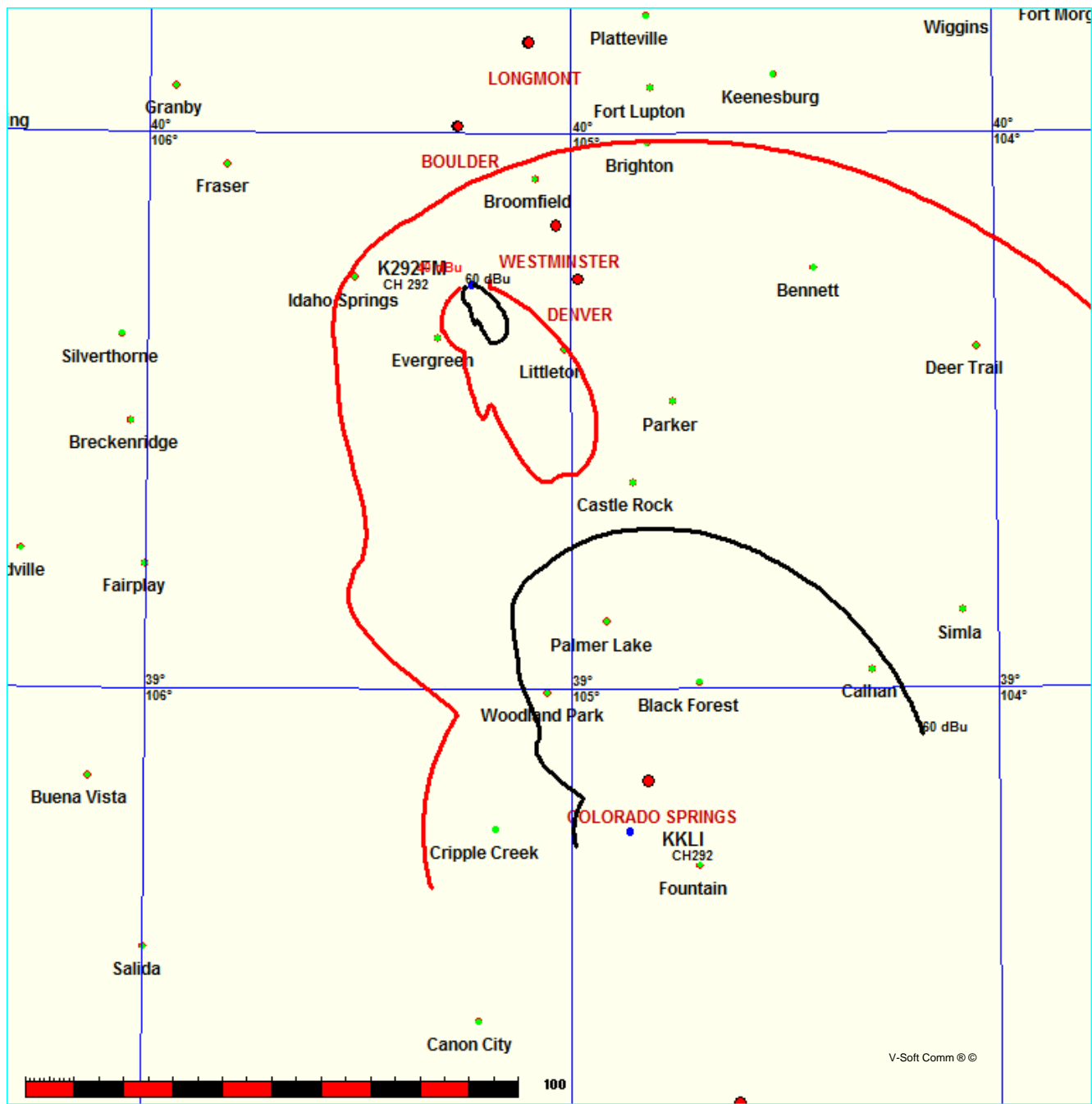
K292FM Present
Present vs Proposed
60 dBu Contours



Minor Change to K292FM
vs KKLI

FMCommander Single Allocation Study
02-09-2007

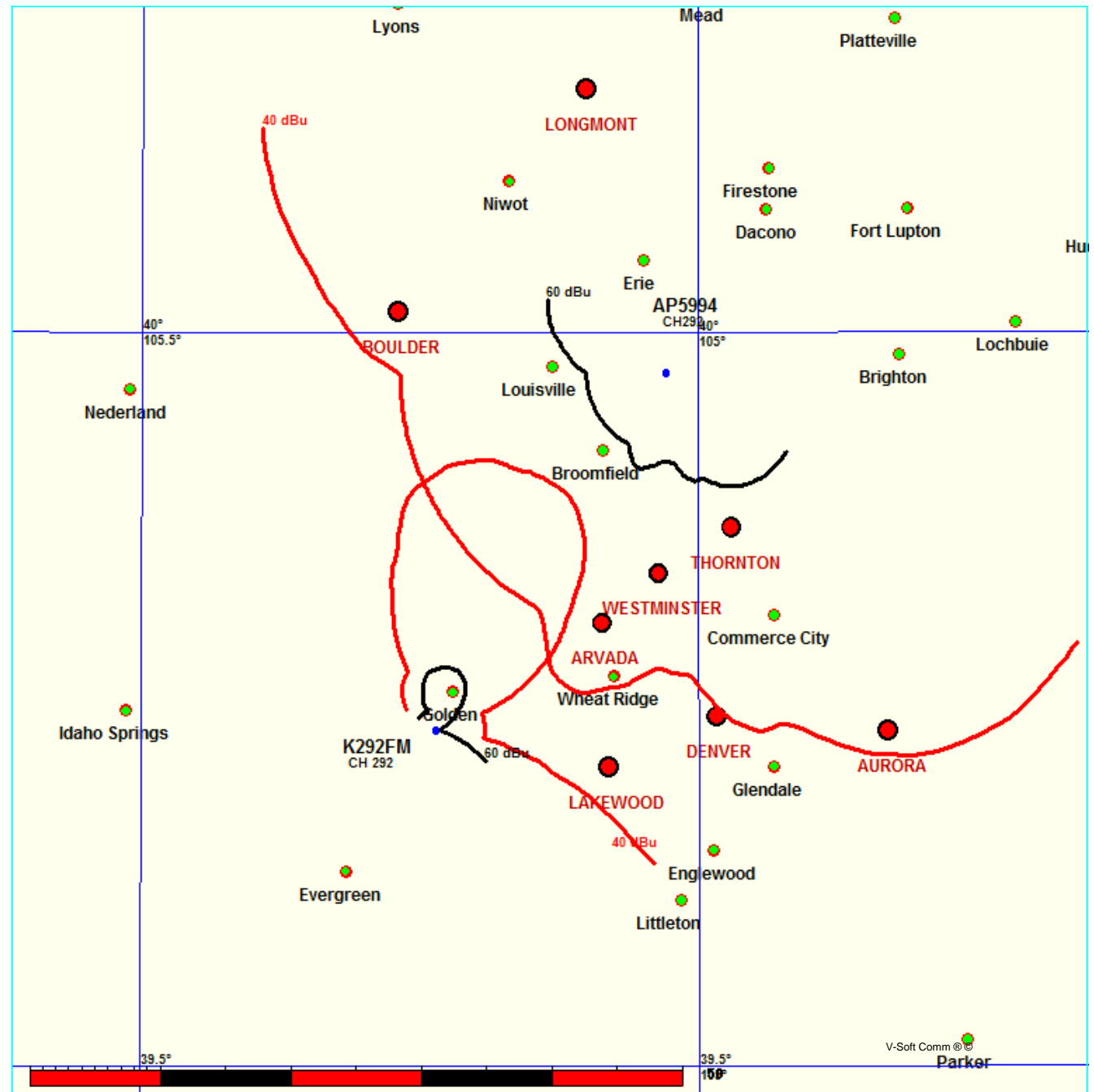
| | | | | |
|-----------------|---------------|-----------------|------------|---------------------|
| K292FM | CH 292 D | KKLI | CH 292 C2 | BLH19901205KE |
| 0.035 kW | 2241 M COR DA | 1.6 kW, | 2933 M COR | |
| Prot. = 60 dBu | | Prot. = 60 dBu | | |
| Intef. = 40 dBu | | Intef. = 40 dBu | | Scale = 1:2,000,000 |



Minor Change to K292FM
vs AP292 Westminster, CO

FMCommander Single Allocation Study
02-09-2007

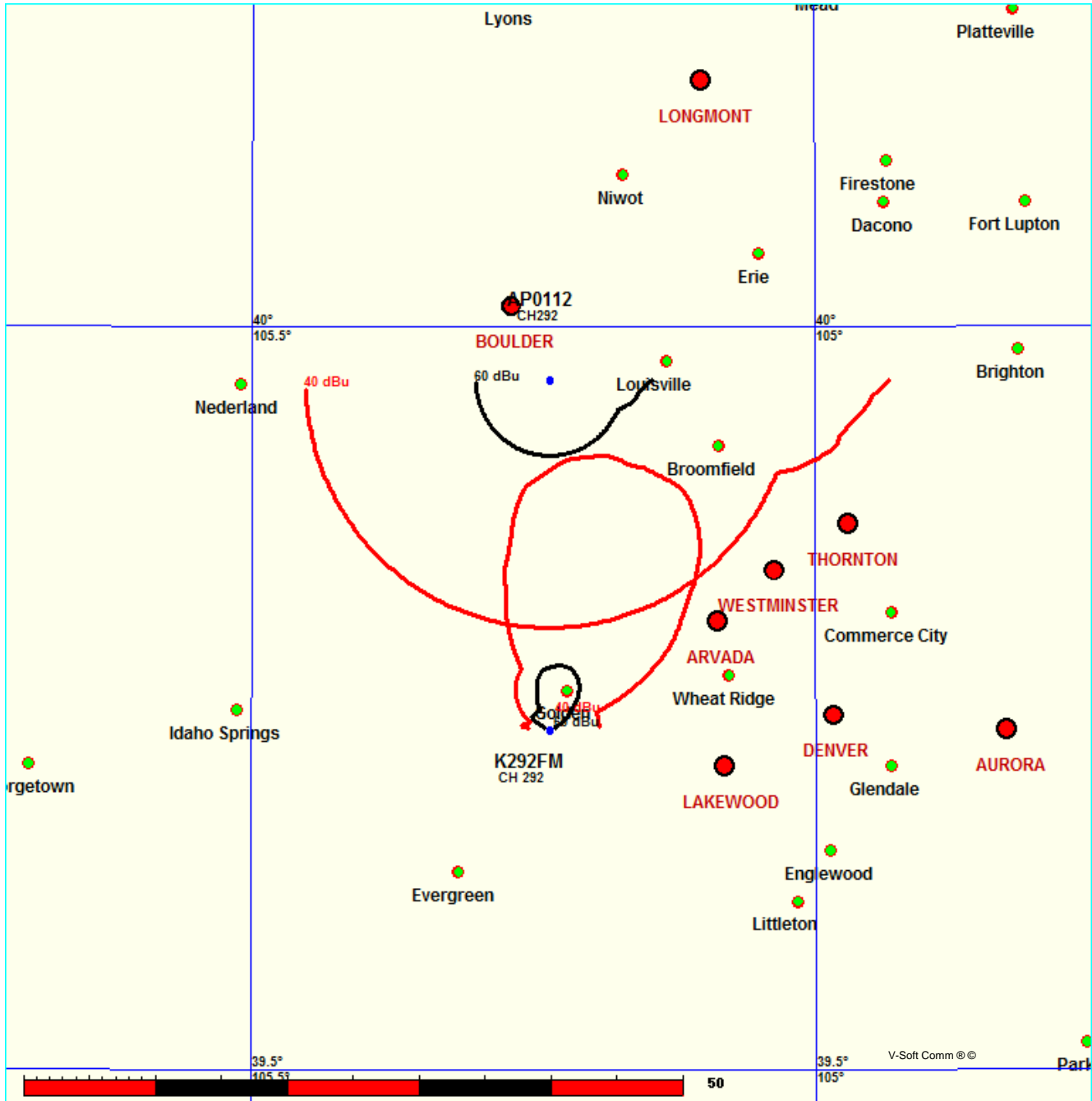
| | | | | |
|-----------------|---------------|-----------------|--------------|-------------------|
| K292FM | CH 292 D | AP5994 | CH 292 D | BNPFT20030317HFR |
| 0.035 kW | 2241 M COR DA | 0.14 kW, | 1674.1 M COR | |
| Prot. = 60 dBu | | Prot. = 60 dBu | | |
| Intef. = 40 dBu | | Intef. = 40 dBu | | Scale = 1:750,000 |



Minor Change to K292FM
vs AP292 Boulder, CO

FMCommander Single Allocation Study
02-09-2007

| | | | | |
|-----------------|---------------|-----------------|------------|-------------------|
| K292FM | CH 292 D | AP0112 | CH 292 D | BNPFT20030317EME |
| 0.035 kW | 2241 M COR DA | 0.099 kW, | 1699 M COR | |
| Prot. = 60 dBu | | Prot. = 60 dBu | | |
| Intef. = 40 dBu | | Intef. = 40 dBu | | Scale = 1:750,000 |



July 28, 2005

Ronald Johnson,
Consulting Engineer
Educational Communications
Of Colorado Springs, Inc.
1665 Briargate Blvd., Suite 200
Colorado Springs, CO 80920

RE: Lookout Mountain Transmitter Site

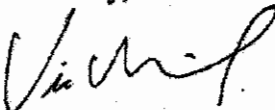
Dear Dr. Johnson:

In response to your inquiry, our tower site at Lookout Mountain (39-43-46 105-14-08) is indeed both uninhabited and unpopulated within 10 meters of our tower. The building adjacent to the tower is our transmitter and equipment building. Because of its size and its age it is represented on the 7.5 min topographical map as a building or structure.

The building was used as a dwelling many years ago, but has long since been abandoned in favor of its current function as a transmitter and electronic equipment building. No one lives there, no one can live there, and the building is fenced off with warning signs posted warning the general public away from the area. There is no running water or septic in use at the facility.

If there is any additional information that I can provide for you, please do not hesitate to contact me.

Sincerely,



Vic Michael,
Mauna Towers, LLC.
6807 Foxglove Drive
Cheyenne, WY 82009
307-778-9318
307-632-9349(fax)
vicmichael@aol.com



07.24.2005