

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

NOVEMBER 2004

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ON BEHALF OF ROSE CITY RADIO CORPORATION  
FOR STATION KMPC(AM) 1540 KILOHERTZ  
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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 a request for modification of construction permit BP-20031216ADK for AM station KMPC Los Angeles, California. Rose City is the licensee of KMPC. KMPC is licensed to operate on 1540 kilohertz with power of 50 kilowatts daytime and 10 kilowatts nighttime employing a dual mode directional antenna system. The construction permit authorizes a modified 50 kilowatt daytime operation and a 2.9 kilowatt nighttime operation with a dual mode directional antenna system from the existing transmitter site. This report proposes a minor modification of the permit. Specifically, changes to the directional antenna electrical parameters and a power increase to 40 kilowatts are sought for the KMPC nighttime antenna system. The only other change proposed is to amend the height above ground for tower number 1 from 60.4 to 66.5 meters. Since the electrical height of this tower, which is also employed for the daytime antenna system, will not change, this amendment has no effect on the proposed daytime operation.

### 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 nighttime 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 16.5%. 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 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 4.0%.

The only other significant nighttime protection requirements are for co-channel Class A station KXEL Waterloo, Iowa and first adjacent channel Class A station KFBK Sacramento, California. Figure 2 is a map that shows the proposed KMPC nighttime operation will continue to provide ample protection to the KXEL protected 0.5 mv/m 50% skywave service area. The entire 0.5 mv/m KFBK groundwave contour area is overlapped by the licensed KMPC nighttime operation. Figure 3 shows the proposed KMPC nighttime operation will significantly reduce the overlap area.

#### TECHNICAL DATA AND EXHIBITS

Figure 1 is a polar plot of the proposed KMPC nighttime antenna pattern. Table 1 is a tabulation of pertinent nighttime vertical radiation.

A map of the city of license service contours for the existing and proposed KMPC nighttime operation is not provided since the proposed pattern maintains or increases radiation in all directions toward the city of license, Los Angeles, California. The KMPC nighttime interference free contour has been determined to be 7.96 mv/m.

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,

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November 29, 2004

TABLE 1  
NIGHTTIME STANDARD RADIATION PATTERN DATA  
ROSE CITY RADIO CORPORATION  
AM BROADCAST STATION KMPC  
1540 KILOHERTZ 40 KW DA-N  
LOS ANGELES, CALIFORNIA

STANDARD RADIATION  
(at One Kilometer)

Azimuth Angle (deg)	-----Elevation Angle in Degrees-----						
	0 (mV/m)	5 (mV/m)	10 (mV/m)	15 (mV/m)	20 (mV/m)	25 (mV/m)	30 (mV/m)
0	714.	711.	701.	683.	658.	623.	580.
5	671.	670.	665.	656.	640.	616.	583.
10	590.	591.	593.	594.	592.	582.	562.
15	485.	488.	498.	510.	521.	527.	523.
20	368.	374.	390.	414.	439.	461.	474.
25	256.	263.	285.	317.	355.	392.	420.
30	163.	170.	193.	231.	278.	326.	367.
35	110.	114.	129.	164.	214.	270.	320.
40	104.	100.	99.0	121.	169.	228.	284.
45	110.	104.	91.5	101.	143.	202.	259.
50	107.	100.	88.5	96.2	136.	191.	246.
55	97.5	94.2	91.7	107.	146.	195.	243.
60	107.	108.	116.	136.	170.	211.	250.
65	148.	151.	161.	179.	204.	233.	261.
70	205.	207.	213.	224.	239.	257.	272.
75	258.	259.	260.	264.	269.	274.	279.
80	295.	294.	292.	288.	285.	282.	279.
85	307.	305.	300.	293.	285.	277.	268.
90	293.	290.	285.	276.	267.	258.	249.
95	254.	253.	248.	242.	235.	228.	221.
100	204.	204.	202.	200.	197.	195.	192.
105	166.	166.	167.	167.	168.	168.	166.
110	163.	163.	162.	160.	156.	151.	145.
115	185.	183.	177.	167.	154.	140.	125.
120	195.	192.	182.	165.	144.	121.	99.0
125	178.	174.	162.	143.	120.	95.0	74.8
130	164.	161.	152.	141.	128.	119.	115.
135	262.	261.	257.	252.	246.	240.	234.
140	492.	489.	481.	469.	452.	431.	405.
145	814.	808.	790.	762.	723.	676.	621.
150	1208.	1198.	1167.	1116.	1049.	967.	875.
155	1658.	1642.	1595.	1519.	1417.	1296.	1159.
160	2146.	2124.	2059.	1954.	1815.	1649.	1465.
165	2653.	2625.	2541.	2406.	2228.	2016.	1780.
170	3159.	3124.	3021.	2857.	2639.	2381.	2095.
175	3645.	3604.	3483.	3290.	3035.	2732.	2397.

TABLE 1  
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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-----					
	35	40	45	50	55	60
	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)
0	528.	469.	405.	338.	273.	211.
5	539.	486.	425.	359.	291.	226.
10	530.	487.	432.	370.	304.	238.
15	507.	475.	430.	374.	311.	245.
20	472.	455.	420.	372.	313.	250.
25	433.	428.	405.	364.	311.	251.
30	393.	400.	387.	354.	307.	250.
35	356.	373.	368.	342.	300.	247.
40	326.	349.	349.	329.	292.	243.
45	303.	329.	333.	317.	283.	237.
50	288.	314.	319.	304.	273.	230.
55	281.	303.	307.	293.	263.	222.
60	280.	296.	296.	281.	253.	214.
65	281.	290.	287.	270.	242.	205.
70	282.	284.	276.	258.	230.	196.
75	280.	276.	264.	245.	218.	185.
80	273.	264.	250.	230.	205.	174.
85	259.	248.	234.	214.	191.	163.
90	239.	228.	214.	197.	176.	151.
95	214.	205.	193.	178.	160.	139.
100	187.	181.	171.	158.	143.	126.
105	162.	156.	148.	138.	127.	114.
110	137.	130.	124.	118.	112.	104.
115	112.	103.	99.3	99.0	99.3	97.3
120	82.5	76.3	80.2	88.4	95.3	97.1
125	66.5	72.7	86.0	98.5	106.	107.
130	118.	125.	132.	136.	134.	127.
135	227.	219.	209.	195.	178.	157.
140	377.	345.	310.	273.	234.	195.
145	561.	497.	431.	365.	301.	240.
150	775.	672.	569.	469.	375.	290.
155	1014.	866.	721.	583.	456.	344.
160	1269.	1072.	881.	702.	541.	400.
165	1533.	1285.	1046.	824.	626.	456.
170	1795.	1496.	1209.	945.	711.	511.
175	2047.	1698.	1365.	1060.	791.	564.

TABLE 1  
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NIGHTTIME STANDARD RADIATION PATTERN DATA  
KMPC LOS ANGELES, CALIFORNIA

STANDARD RADIATION  
(at One Kilometer)

Azimuth Angle (deg)	-----Elevation Angle in Degrees-----						
	0 (mV/m)	5 (mV/m)	10 (mV/m)	15 (mV/m)	20 (mV/m)	25 (mV/m)	30 (mV/m)
180	4092.	4046.	3909.	3689.	3399.	3055.	2675.
185	4486.	4435.	4283.	4041.	3720.	3340.	2921.
190	4813.	4757.	4594.	4332.	3987.	3577.	3125.
195	5061.	5002.	4830.	4554.	4189.	3757.	3280.
200	5222.	5162.	4984.	4698.	4321.	3874.	3380.
205	5292.	5231.	5050.	4760.	4377.	3923.	3422.
210	5267.	5206.	5025.	4737.	4355.	3903.	3404.
215	5146.	5087.	4910.	4628.	4256.	3814.	3327.
220	4933.	4876.	4707.	4437.	4080.	3657.	3190.
225	4633.	4580.	4421.	4168.	3834.	3437.	3000.
230	4255.	4206.	4061.	3830.	3524.	3162.	2762.
235	3812.	3768.	3639.	3433.	3162.	2840.	2484.
240	3321.	3283.	3173.	2996.	2763.	2486.	2180.
245	2808.	2777.	2686.	2540.	2347.	2118.	1864.
250	2310.	2286.	2214.	2098.	1945.	1763.	1560.
255	1885.	1866.	1811.	1721.	1602.	1458.	1298.
260	1612.	1596.	1550.	1474.	1374.	1253.	1117.
265	1556.	1540.	1492.	1414.	1311.	1188.	1051.
270	1694.	1674.	1615.	1521.	1398.	1253.	1093.
275	1923.	1899.	1827.	1712.	1562.	1387.	1196.
280	2152.	2123.	2039.	1906.	1732.	1529.	1309.
285	2322.	2291.	2198.	2051.	1860.	1637.	1396.
290	2404.	2371.	2275.	2122.	1922.	1690.	1439.
295	2386.	2353.	2257.	2105.	1907.	1676.	1426.
300	2267.	2236.	2145.	2001.	1814.	1595.	1358.
305	2057.	2029.	1948.	1818.	1650.	1452.	1239.
310	1773.	1750.	1681.	1571.	1427.	1260.	1077.
315	1439.	1420.	1366.	1279.	1165.	1031.	885.
320	1079.	1066.	1027.	964.	882.	784.	678.
325	725.	717.	693.	654.	602.	541.	474.
330	418.	415.	404.	387.	364.	336.	304.
335	268.	268.	265.	261.	254.	245.	233.
340	370.	368.	361.	350.	335.	316.	294.
345	528.	524.	512.	493.	466.	434.	397.
350	646.	642.	627.	604.	572.	533.	486.
355	708.	703.	690.	668.	636.	596.	548.



TABLE 1  
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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-----					
	35	40	45	50	55	60
	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)	(mV/m)
180	2279.	1885.	1509.	1166.	865.	612.
185	2484.	2049.	1636.	1259.	929.	653.
190	2653.	2185.	1740.	1335.	982.	688.
195	2782.	2288.	1820.	1393.	1022.	713.
200	2866.	2355.	1870.	1430.	1047.	729.
205	2900.	2382.	1891.	1445.	1057.	734.
210	2885.	2369.	1880.	1436.	1050.	730.
215	2819.	2315.	1837.	1404.	1027.	714.
220	2704.	2222.	1765.	1350.	989.	689.
225	2545.	2093.	1665.	1275.	936.	654.
230	2346.	1932.	1540.	1183.	872.	612.
235	2114.	1746.	1396.	1077.	798.	563.
240	1861.	1543.	1239.	961.	717.	510.
245	1598.	1332.	1077.	842.	633.	455.
250	1346.	1130.	921.	726.	551.	400.
255	1127.	953.	783.	623.	477.	349.
260	972.	824.	679.	541.	415.	305.
265	907.	761.	620.	489.	371.	270.
270	927.	764.	609.	469.	347.	246.
275	1000.	809.	632.	474.	340.	232.
280	1085.	867.	667.	491.	343.	225.
285	1151.	915.	697.	506.	347.	222.
290	1183.	937.	711.	513.	348.	218.
295	1173.	928.	703.	505.	341.	211.
300	1117.	885.	670.	482.	324.	200.
305	1021.	810.	615.	442.	298.	183.
310	890.	708.	539.	390.	263.	162.
315	735.	588.	450.	327.	223.	138.
320	567.	458.	354.	261.	181.	115.
325	402.	331.	263.	200.	144.	97.6
330	268.	231.	194.	158.	123.	92.2
335	217.	198.	177.	153.	127.	102.
340	269.	242.	213.	182.	152.	121.
345	356.	313.	270.	226.	185.	145.
350	435.	381.	325.	271.	218.	170.
355	494.	434.	371.	309.	248.	192.