

Exhibit 27 – Statement A
NATURE OF THE PROPOSAL
prepared for
BMG Billings, LLC
KQBL(FM) Billings, Montana
Facility ID 76918
Ch. 283C1 100 kW 124 m

BMG Billings, LLC (“*BMG*”), licensee of FM radio station KQBL(FM), Billings, MT is licensed¹ to operate KQBL as a Class A facility on channel 286. The instant application seeks to upgrade the KQBL class status to Class C1 on third-adjacent channel 283 as a minor change². This upgrade represents a 339% increase in 60 dBμ coverage area and thus permits improved service to the public.

The facility specified herein is identical to that of Construction Permit facility BPH-20060720AAW. This Construction Permit expired September 19, 2009, just a few months after the KQBL license was assigned to *BMG*.³

The proposed KQBL facility will operate with an effective radiated power (“ERP”) of 100 kW and an antenna height above average terrain (“HAAT”) of 124 meters. The proposed non-directional antenna will be side-mounted on an existing structure (ASR 1239653) having an overall height of 157 meters above ground. The proposed tower is located immediately adjacent to that presently authorized for KQBL.

The proposed transmitter site is located on Sacrifice Cliff, Montana, elevations of which vary widely from the surrounding area. U.S.G.S. 3 arc-second digitized terrain data was employed in the determination of average terrain elevations. For greater accuracy, 36 evenly spaced radials were utilized to develop the resulting antenna HAAT, as detailed in **Exhibit 25 – Table 1**, in lieu of the eight “standard” radials. The varying terrain elevations provided in **Exhibit 25 – Table 1** demonstrates that the surrounding terrain in this region is far from uniform. Established Commission policy encourages the use of additional evenly spaced radials where increased accuracy is desirable⁴.

¹ File Number BLH-19981229KD

² See 47 C.F.R. 73.3573(a)(1); see also *Amendment of the Commission's Rules to Permit FM Channel and Class Modifications by Application*, Report and Order, 8 FCC Rcd 4735, note 1 (1993).

³ See BAL-20090427ADH, granted June 5, 2009.

⁴ *Amendment of Parts 22, 73, 81, and 90 of the Commission's Rules to Standardize the Use of Digitized Terrain Data*

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As shown in the attached **Exhibit 25 - Figure 1**, a coverage contour map for the proposed facility, the principal community of Billings, Montana is predicted to be completely encompassed by the 70 dBμ contour of the proposed Channel 283C1 facility. The KQBL main studio is also located within Billings.

The proposed Channel 283C1 facility meets the minimum distance separation requirements of Section 73.207 of the Commission's Rules with respect to all other stations, allotments, and proposals as contained within the Commission's CDBS database.

REFERENCE							DISPLAY DATES	
45 45 54.0 N.			CLASS = C1				DATA	11-17-09
108 27 19.0 W.			Current Spacings to 3rd Adj.				SEARCH	11-17-09
----- Channel 283 - 104.5 MHz -----								
Call	Channel		Location		Azi	Dist	FCC	Margin

KQBL	LIC	286A	Billings	MT	270.0	0.0	74.5	74.5
KCGL	LIC	281C	Powell	WY	201.4	151.4	104.5	46.9

The site is located 360 km from the U.S. - Canadian border, which is outside the "border area" specified in the Canadian Agreement⁵. Therefore, international coordination is not believed to be a factor in this case. The nearest FCC monitoring station is 975 km at Grand Island, NE. This distance exceeds by a great margin the threshold minimum distance specified in §73.1030 that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site according to information extracted from the Commission's engineering database.

It is thus believed that the facility proposed herein satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

for Determining Antenna Heights Above Average Terrain, GEN Docket 84-705, FCC 84-594, released December 10, 1984, at para 11.

⁵*Agreement between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service and the Associated Working Arrangement*, publication date June 1997.

Exhibit 27 - Table 1
ANTENNA HEIGHT ABOVE AVERAGE TERRAIN
 prepared for
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 KQBL(FM) Billings, Montana
 Ch. 283C1 100 kW 124 m

Curve: F(50,50) FM
 ERP: 100 kW

Antenna C/R AMSL: 1168 m
 Location: 45° 45' 54" N. Lat. 108° 27' 19" W. Long. (NAD27)

Azimuth (°T)	<u>Average Elevation (m AMSL)</u>	<u>Antenna Effective Height (m)</u>	---- Contour ---- Distances		Azimuth (°T)	<u>Average Elevation (m AMSL)</u>	<u>Antenna Effective Height (m)</u>	---- Contour ---- Distances	
			<u>70 dBμ (km)</u>	<u>60 dBμ (km)</u>				<u>70 dBμ (km)</u>	<u>60 dBμ (km)</u>
0	992.30	175.70	26.18	43.96	190	1109.90	58.10	15.19	26.84
10	963.40	204.60	28.03	46.31	200	1103.20	64.80	16.05	28.09
20	952.60	215.40	28.76	47.15	210	1099.70	68.30	16.51	28.73
30	957.50	210.50	28.42	46.77	220	1079.60	88.40	18.99	32.49
40	1002.10	165.90	25.52	42.95	230	1040.80	127.20	22.68	38.24
50	1043.50	124.50	22.48	37.92	240	968.70	199.30	27.68	45.90
60	1061.60	106.40	20.91	35.52	250	966.00	202.00	27.86	46.11
70	1052.60	115.40	21.75	36.80	260	974.70	193.30	27.29	45.42
80	1068.90	99.10	20.17	34.37	270	979.90	188.10	26.95	45.00
90	1079.00	89.00	19.06	32.60	280	988.80	179.20	26.40	44.27
100	1090.40	77.60	17.68	30.44	290	1038.70	129.30	22.84	38.49
110	1098.30	69.70	16.68	28.97	300	1053.30	114.70	21.69	36.71
120	1092.00	76.00	17.49	30.15	310	1040.00	128.00	22.74	38.34
130	1105.40	62.60	15.77	27.69	320	1026.30	141.70	23.78	40.03
140	1097.10	71.00	16.84	29.21	330	1010.90	157.10	24.90	41.93
150	1104.20	63.90	15.92	27.91	340	987.20	180.80	26.50	44.41
160	1103.60	64.40	15.99	28.01	350	989.50	178.50	26.35	44.21
170	1124.10	43.90	13.16	23.54					
180	1124.00	44.00	13.18	23.58					
Average:					1043.60	124.40	(36 Radials)		

EXHIBIT 27 - FIGURE 1
PROPOSED COVERAGE CONTOURS

prepared November 2009 for
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Ch. 283C1 100 kW 124 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

