

Exhibit B-16
KFJO(FM) Channel 221A Walnut Creek, CA
Allocation Study

KFJO is presently licensed for operation as a 3 kilowatt Class A station at coordinates N37-53-59 x W122-05-38. It has been determined, however, that the site coordinates were originally calculated in error. This application serves to correct the station's coordinates to N37-54-02 x W122-05-07. It should be noted that no change in the station's transmitting facilities are proposed by this application. The only change is a "paper change" in the station's location, correcting an error which date back to the late 1950s.

The attached spacing study shows that at the corrected coordinates, KFJO meets the co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules, with the exception of short-spacings to stations KALW Channel 219B1 San Francisco, KLVR Channel 220B Santa Rosa, and KSJO Channel 222B San Jose.

KALW Channel 219B1 San Francisco

KFJO operates as a "pre 1964" grandfathered short-spaced station with respect to KALW (FCC File No. BLED-1644). KFJO and KALW are second-adjacent channel stations which have remained continuously short-spaced since prior to November 16, 1964. Therefore, pursuant to §73.213(a)(4) of the Commission's Rules, there are no distance separation or interference protection requirements for KFJO with respect to KALW.

KLVR Channel 220B Santa Rosa

KLVR operates as a §73.215 short-spaced station with respect to KFJO. In the application for the present licensed facility (FCC File No. BLED-19920806KA), KLVR was required to demonstrate that it provided contour protection to KFJO, assuming that KFJO were operating with full Class A facilities of 6 kW ERP and 100 meters HAAT.

The instant application proposes to correct the KFJO coordinates to a site which is 280 meters farther from KLVR than are the licensed KFJO coordinates.

Since the proposed corrected coordinates for KFJO are farther from KLVR than are the licensed KFJO coordinates, and since KLVR operates as a §73.215 short-spaced station with respect to KFJO, it is not believed necessary to request KFJO operation pursuant to §73.215 with respect to KLVR. Nevertheless, the attached map exhibit demonstrates that the licensed KLVR facility will continue to provide the requisite §73.215 contour protection to KFJO at its corrected coordinates.

SEARCH PARAMETERS

FM Database Date: 031126

Channel: 221A 92.1 MHz
 Latitude: 37 54 2
 Longitude: 122 5 7
 Safety Zone: 32 km
 Job Title: KFJO SITE CORRECTION

| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|------------------------------------|----------------------|-----------------|------------------|--------------------|-----------------------|---------------------|-----------------|--------------|
| KASK CP | FAIRFIELD CA | BPED-960606MB | 218A 91.5 | 0.080 198.0 | 38-19-09 121-59-30 | 10.0 | 47.18 16.18 | 31 CLEAR |
| K220IP LIC | LEISURE TOWN CA | BLFT-970506TD | 218D 91.5 | 0.010 750.0 | 38-23-32 122-05-46 | 359.0 | 54.58 0.00 | 0 TRANS |
| KALW LIC | SAN FRANCISCO CA | BLED-1644 | 219B1 91.7 | 1.900 280.0 | 37-45-17 122-26-44 | 243.0 | 35.61 -12.39 | 48 SHORT |
| KLVR-FM1AETNA SPRINGS, ETC. LIC | CA | BLFTB-880712TA | 220D 91.9 | 0.080 0.0 | 38-39-22 122-36-57 | 331.3 | 95.86 0.00 | 0 BOOST |
| K220IP CP | LEISURE TOWN CA | BPFT-020426ABF | 220D 91.9 | 0.010 749.0 | 38-23-31 122-05-45 | 359.0 | 54.55 0.00 | 0 TRANS |
| K220BV LIC | SAN JOSE, ETC. CA | BLFT-030925ATN | 220D 91.9 | 0.010 932.0 | 37-09-35 121-54-29 | 169.2 | 83.70 0.00 | 0 TRANS |
| KLVR LIC | SANTA ROSA CA | BLED-920806KA | 220B 91.9 | 0.830 911.0 | 38-40-09 122-37-53 | 331.0 SS | 97.78 -15.22 | 113 SHORT |
| NEW-T APP | LODI CA | BNPFT-030317HIS | 221D 92.1 | 0.080 55.0 | 38-06-43 121-15-07 | 71.9 | 76.86 0.00 | 0 TRANS |
| NEW-T APP | LODI CA | BNPFT-030731ATC | 221D 92.1 | 0.080 55.0 | 38-06-43 121-15-07 | 71.9 | 76.86 0.00 | 0 TRANS |
| KFJO-FM3MARTINEZ LIC | CA | BLFTB-931118TD | 221D 92.1 | 0.250 0.0 | 38-00-43 122-08-10 | 340.2 | 13.15 0.00 | 0 BOOST |
| NEW-T APP | PATTERSON CA | BNPFT-030313ARA | 221D 92.1 | 0.020 325.0 | 37-34-30 121-21-17 | 119.2 | 73.84 0.00 | 0 TRANS |
| NEW-T APP | PATTERSON CA | BNPFT-030313ASM | 221D 92.1 | 0.020 325.0 | 37-34-30 121-21-17 | 119.2 | 73.84 0.00 | 0 TRANS |
| K221DQ CP | PETALUMA CA | BPFT-960910TM | 221D 92.1 | 0.010 392.0 | 38-21-20 122-37-00 | 317.6 | 68.71 0.00 | 0 TRANS |
| K221DQ LIC | PETALUMA CA | BLFT-001127AAR | 221D 92.1 | 0.020 392.0 | 38-21-20 122-37-00 | 317.6 | 68.71 0.00 | 0 TRANS |

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SEARCH PARAMETERS FM Database Date: 031126

Channel: 221A 92.1 MHz Page 2

Latitude: 37 54 2

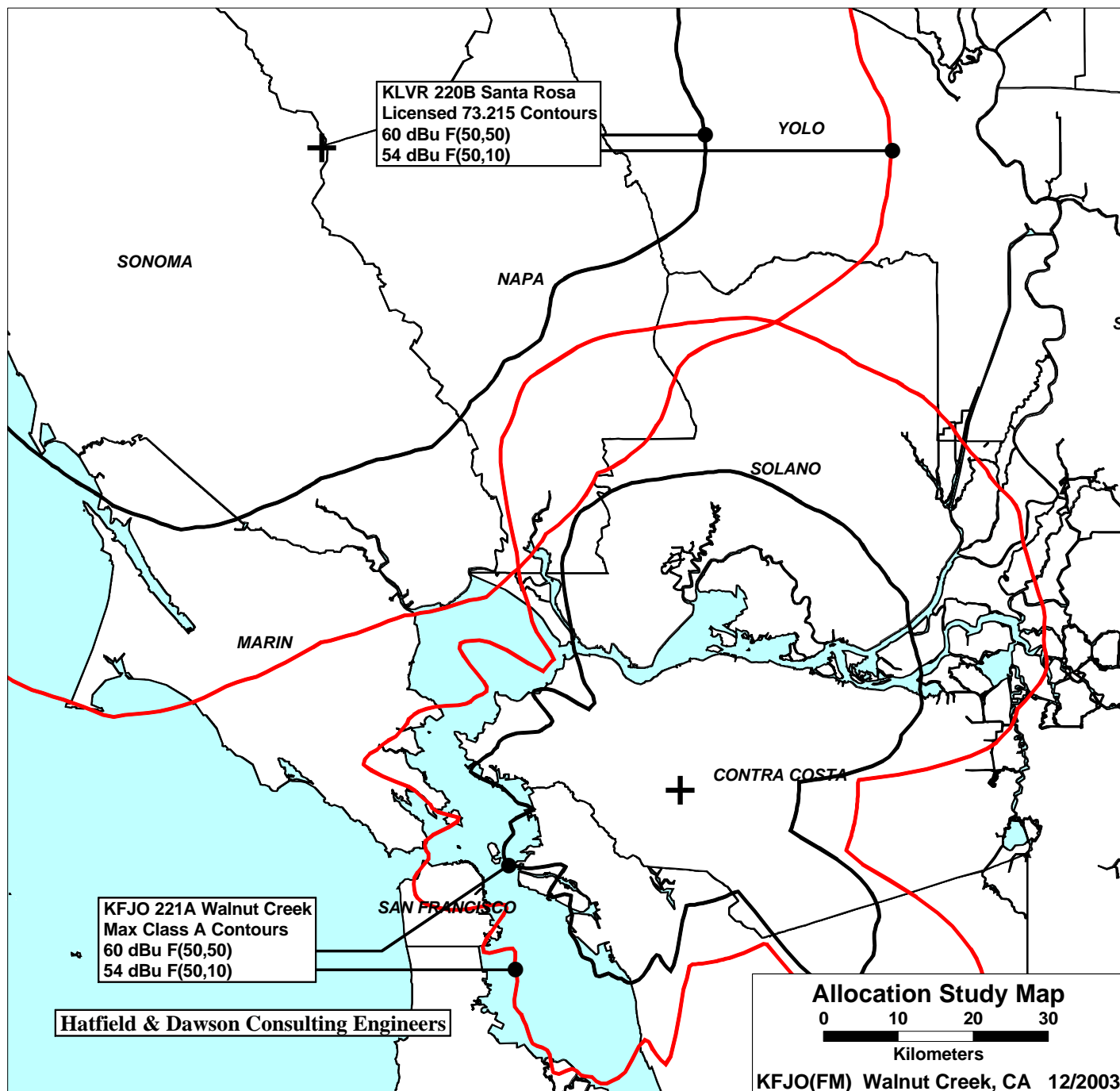
Longitude: 122 5 7

Safety Zone: 32 km

Job Title: KFJO SITE CORRECTION

| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|-----------------|----------------------|-----------------|------------------|--------------------|-----------------------|---------------------|-----------------|--------------|
| KZSA LIC | PLACERVILLE CA | BLH-000114ABM | 221A 92.1 | 1.850 127.0 | 38-43-07 120-47-40 | 50.7 | 144.89 29.89 | 115 CLEAR |
| K221CH LIC | STOCKTON CA | BLFT-890901TA | 221D 92.1 | 0.010 55.0 | 37-58-50 121-18-29 | 82.3 | 68.90 0.00 | 0 TRANS |
| KFJO LIC | WALNUT CREEK CA | BLH-4499 | 221A 92.1 | 3.000 27.0 | 37-53-59 122-05-38 | 263.0 | 0.76 -114.24 | 115 SHORT |
| KFJO-FM1 LIC | WEST PITTSBURG CA | BLFTB-950628TE | 221D 92.1 | 0.090 88.0 | 38-01-27 121-58-43 | 34.2 | 16.62 0.00 | 0 BOOST |
| NEW-T APP | COLLEGEVILLE CA | BNPFT-030313AWC | 222D 92.3 | 0.250 59.0 | 37-53-54 121-06-36 | 89.9 | 85.78 0.00 | 0 TRANS |
| NEW-T APP | MODESTO CA | BNPFT-030317ASX | 222D 92.3 | 0.120 42.0 | 37-38-30 121-00-07 | 106.5 | 99.68 0.00 | 0 TRANS |
| KSJO LIC | SAN JOSE CA | BLH-000706AEK | 222B 92.3 | 32.000 142.0 | 37-12-33 121-46-30 | 160.3 | 81.49 -31.51 | 113 SHORT |
| NEW-T APP | PETALUMA CA | BNPFT-030310BKO | 223D 92.5 | 0.010 0.0 | 38-13-55 122-29-48 | 315.8 | 51.54 0.00 | 0 TRANS |
| KPTI LIC | ALAMEDA CA | BLH-980908KD | 224A 92.7 | 3.600 128.0 | 37-47-54 122-24-59 | 248.7 | 31.27 0.27 | 31 CLOSE |
| KBLXaux LIC | BERKELEY CA | BLH-920702KB | 275B 102.9 | 7.000 336.0 | 37-41-20 122-26-07 | 232.7 | 38.76 0.00 | 0 AUX |
| KBLX-FM LIC | BERKELEY CA | BLH-790419AD | 275B 102.9 | 6.600 393.0 | 37-41-20 122-26-07 | 232.7 | 38.76 23.76 | 15 CLEAR |
| KBLX-FM2 LIC | PLEASANTON CA | BLFTB-010302ABP | 275D 102.9 | 0.190 927.0 | 37-52-55 121-55-05 | 98.0 | 14.85 0.00 | 0 BOOST |

44444 END OF FM SPACING STUDY FOR CHANNEL 221 44444



KSJO Channel 222B San Jose

KFJO operates as a "pre 1964" grandfathered short-spaced station with respect to KSJO.

An interference analysis has been conducted to determine the areas and populations (2000 Census) subject to caused and received interference from both the licensed and corrected KFJO facilities.

| KFJO License | Area | Population |
|---------------------------------|---------------------|-------------------|
| Interference caused to KSJO | 583 km ² | 484,468 |
| Interference received from KSJO | 186 km ² | 68,785 |
| Total | 769 km ² | 553,253 |

| KFJO at Corrected Site | Area | Population |
|---------------------------------|---------------------|-------------------|
| Interference caused to KSJO | 581 km ² | 490,881 |
| Interference received from KSJO | 186 km ² | 63,182 |
| Total | 767 km ² | 554,063 |

These figures demonstrate that the KFJO site correction will result in a slight decrease in the total area subject to first-adjacent-channel interference, caused and received. There will also be a decrease in the area subject to caused interference.

There will, however, be a slight increase in the total population subject to first-adjacent-channel interference, caused and received, as well as an increase in the population subject to caused interference. It should be noted that these increases are merely a

“paper change”, as the instant application is intended to correct a long-standing error in the station’s transmitter site coordinates.

New Caused Interference Area

As depicted on the attached map exhibit #5, grant of the instant application will result in the creation of a “new” area subject to first-adjacent-channel interference within the KSJO 54 dBu F(50,50) contour. However, this area will be left with adequate aural service. The following stations provide protected service to 100% of the new area subject to caused interference:

| | | |
|---------|------|---------------|
| KQED-FM | 203B | San Francisco |
| KPFA-FM | 231B | Berkeley |
| KYLD-FM | 235B | San Francisco |
| KOIT-FM | 243B | San Francisco |
| KLLC-FM | 247B | San Francisco |
| KISQ-FM | 251B | San Francisco |
| KFRC-FM | 259B | San Francisco |
| KIOI-FM | 267B | San Francisco |
| KDFC-FM | 271B | San Francisco |
| KITS-FM | 287B | San Francisco |
| KMEL-FM | 291B | San Francisco |
| KEAR-FM | 295B | San Francisco |
| KSTN-FM | 297B | Stockton |

Several other stations provide service to all or part of the new area subject to caused interference. A list of those stations can be provided if the Commission so requires.

New Received Interference Area

As depicted on the attached map exhibit #6, grant of the instant application will result in the creation of “new” received interference in some areas which are a) within the licensed

KFJO interference-free limit, b) within the proposed KFJO 60 dBu contour, and c) outside the proposed KFJO interference-free limit. However, this area will be left with adequate aural service. The following stations provide protected service to 100% of the new area subject to received interference:

| | | |
|---------|------|---------------|
| KQED-FM | 203B | San Francisco |
| KPFA-FM | 231B | Berkeley |
| KYLD-FM | 235B | San Francisco |
| KOIT-FM | 243B | San Francisco |
| KLLC-FM | 247B | San Francisco |
| KISQ-FM | 251B | San Francisco |
| KFRC-FM | 259B | San Francisco |
| KIOI-FM | 267B | San Francisco |
| KDFC-FM | 271B | San Francisco |
| KITS-FM | 287B | San Francisco |
| KMEL-FM | 291B | San Francisco |
| KEAR-FM | 295B | San Francisco |
| KSTN-FM | 297B | Stockton |

Several other stations provide service to all or part of the new area subject to received interference. A list of those stations can be provided if the Commission so requires.

Other Areas

Certain other areas are either a) within the licensed KFJO interference-free limit but outside the proposed KFJO 60 dBu contour, or b) within the proposed KFJO received interference area but outside the licensed KFJO 60 dBu contour.

Case “a” describes areas where there is a loss of service due to the shift in transmitter site. The loss of service in case “a” is not due to new interference. Case “b” describes “new”

interference areas which do not presently receive service from KFJO. Thus, there is no actual loss of service in case “b”.

Conclusion and Request for Waiver

When reviewed using the criteria of §73.213(a) with respect to first-adjacent KSJO, the KFJO coordinate correction satisfies all requirements with the exception of a) a slight increase in the total population subject to first-adjacent-channel interference, caused and received, and b) an increase in the population subject to caused interference.

The present licensee of KFJO is endeavoring to correct improperly-calculated site coordinates which date back to the inception of this station in the late 1950s. Any “new” areas of interference resulting from the analysis described in detail above have in actuality existed for many years. This is merely a “paper change”. No actual new areas of interference will be created as a result of the grant of the instant application.

The licensed KFJO coordinates are not and never were used as a transmitter site by KFJO. The site is not on a hilltop, is not at the same elevation as the actual KFJO site, and is located within a residential area.

Therefore, the applicant respectfully requests that the Commission waive to the extent necessary the provisions of §73.213(a) with respect to a) a slight increase in the total population subject to first-adjacent-channel interference, caused and received, and b) an increase in the population subject to caused interference.

Hatfield & Dawson Consulting Engineers

