

EXHIBIT E-1
TECHNICAL STATEMENT AND 73.215 PROCESSING REQUEST
YOUNGERS COORADO BROADCASTING LLC
KEZZ PHIPPSBURG, COLORADO 231C2
FCC FORM 301
NOVEMBER 2008

This Technical Statement is in support of a minor change application FCC form 301 filed by Youngers Colorado Broadcasting LLC for KEZZ(FM) facility ID #165959, currently authorized for channel 231C3 at Walden, Colorado. Youngers Colorado Broadcasting LLC respectfully requests 73.215 processing.

KEZZ seeks to change its proposed city of license from Walden, Colorado to the new first local service community of Phippsburg, Colorado on channel 231C2. The Rand McNally 2000 Commercial Atlas & Marketing Guide estimated the 2000 population of Phippsburg at 180 persons. It has grown over 70% to a current population of 309 persons. Conversely, Walden's population declined over 10% from 1990 to 2000, and it has declined an additional 23% since 2000. Phippsburg is an independent community without an AM, FM or TV station authorized to it. This new proposed service to Phippsburg will also provide a new 1st and 2nd service.

Figure 1 is a channel spacing study which shows that channel 231C2 can be allotted to Phippsburg at the coordinates of N. 40°-27'-11", W. 106°-41'-44". The community reference coordinates for Phippsburg, Colorado are: N. 40°-13'-56", W. 106°-56'-34". The proposed allotment point is fully spaced to all of the pertinent stations under 73.207 of the commission's rules. There is an apparent short spacing to KEZZ at Walden, Colorado on channel 231C3. However, that allotment will be eliminated and replaced by the facilities in this proposal.

Figure 2 shows the proposed 70 dB μ predicted (F50,50) contour from a class C2 facility (7 KW ERP at 388 meters HAAT) operating at the proposed allotment point. It shows a facility at this reference point would produce more than adequate 70 dB μ coverage over the entire community of Phippsburg. The allotment point is also within 32.6 km of all of Phippsburg.

Figure 3 shows a channel spacing study from the proposed transmitter site for KEZZ at Phippsburg on channel 231C2. It is located at N. 40°-21'16", W 106°-41'-55", which is an existing antenna site 24.8 kilometers northeast of the community of Phippsburg. The proposed facilities will operate at an RMASL of 3232 meters, HAAT of 528 meters, and with an ERP of 0.82 kW. There is an apparent short spacing to KEZZ at Walden, Colorado on channel 231C2. However, that allotment will be eliminated and replaced by the facilities in this proposal. The proposed facilities will be separated to all other stations as required under 73.207, except KKXK at Montrose, Colorado on channel 231C and KYSL at Frisco, Colorado on channel 230A.

To meet spacing requirements under 73.215 with respect to KKXK, figure 4 shows that there will not be any overlap of the 40 dB μ (F50,10) interference contour of either of the proposed facility for KEZZ or the facility for KKXK, with the 60 dB μ (F50,50) protected contour of the alternate facility. It should be noted that KKXK was adjusted to a maximum class C facility (ERP = 100 kW and HAAT = 600 meters) for the purpose of the interference study.

To meet spacing requirements under 73.215 with respect to KYSL, figure 5 and figure 5B show that there will not be any overlap of the 54 dB μ (F50,10) interference contour of either of the proposed facility for KEZZ or the facility for KYSL, with the 60

dBμ (F50,50) protected contour of the alternate facility. It should be noted that KYSL was adjusted to a maximum class A facility (ERP = 6 kW and HAAT = 100 meters) for the purpose of the interference study.

With respect to KKXK and KYSL, the proposed transmitter site meets all 73.215 spacing requirements. Youngers Colorado Broadcasting LLC respectfully requests 73.215 processing.

Figure 6 shows the predicted coverage contour for the new KEZZ at Phippsburg. It shows that the 70 dBμ contour does encompass the entire community of Phippsburg as required by commission rules.

Figure 7 shows a terrain profile between the proposed transmitter site for KEZZ and the reference community coordinates for the town of Phippsburg, Colorado.

Figure 8 shows the new 1st and 2nd service areas that the proposed facilities will provide.

There will not be any loss of service to the community of Walden, Colorado, since KEZZ was a CP awarded in FM broadcast auction # 62, and as of the date has not yet constructed its authorized facilities at Walden, Colorado on channel 231C3. There will remain 9 primary service contours in Walden, Colorado from facilities located in nearby communities.

It should also be noted that channel 226C3 has been allotted at Walden, Colorado should the Commission determine that an FM allotment is still warranted at Walden. However, channel 231C3 at Walden being exchanged for channel 230C2 at Phippsburg, would certainly be the preferred distribution of channels, based on a much more efficient use of the available spectrum and population covered.

In summary, it was determined that the new proposed operation of KEZZ at Phippsburg, Colorado on channel 231C2 can meet all of the technical requirements under current FCC rules.

Exhibit E-1, Figure 1, Allotment Channel Study
KEZZ Phippsburg, CO 231C3

REFERENCE

40 27 11.0 N.

106 41 44.0 W.

CLASS = C2

Current Spacings to 3rd Adj.

DISPLAY DATES

DATA 11-22-08

SEARCH 11-24-08

Channel 231 - 94.1 MHz ----

Call	Channel	Location	Azi	Dist	FCC	Margin
KEZZ.C	CP -N 231C3	Walden	CO 62.7	52.44	176.5	-124.06
KKXX	LIC 231C	Montrose	CO 199.3	248.52	248.5	0.02
KRAI-FM	LIC 229C1	Craig	CO 280.4	78.53	78.5	0.03
KYSL	LIC 230A	Frisco	CO 153.4	111.25	105.5	5.75
KEZZ.A	APP 230A	Berthoud	CO 91.2	122.28	105.5	16.78
KRKS-FM	LIC-D 234C	Lafayette	CO 110.0	121.72	104.5	17.22
KEZZ	RSV 230A	Berthoud	CO 91.9	130.37	105.5	24.87
KMAX-FM	LIC 232C3	Wellington	CO 67.5	141.41	116.5	24.91
KUSZ	LIC-N 230A	Laramie	WY 42.9	135.37	105.5	29.87
KJEB.C	CP -N 233C1	New Castle	CO 227.6	108.45	78.5	29.95
KILO	LIC 232C	Colorado Springs	CO 139.8	246.47	187.5	58.97
KNEB-FM	LIC 231C1	Scottsbluff	NE 60.2	288.83	223.5	65.33
KJEB	LIC 233C3	New Castle	CO 216.1	121.78	55.5	66.28
KSKE-FM	LIC 284C1	Vail	CO 166.8	93.31	26.5	66.81
NEW.C	CP 228C3	Aspen	CO 190.2	128.29	55.5	72.79
1174201	APP 228A	Aspen	CO 190.2	128.29	54.5	73.79
1174211	APP 228A	Aspen	CO 185.0	136.76	54.5	82.26
AU7052710	VAC 228A	Aspen	CO 184.3	140.62	54.5	86.12
KXRQ	LIC-Z 232C1	Roosevelt	UT 272.7	255.43	157.5	97.93

Exhibit E-1, Figure 2, Allotment Community Coverage
KEZZ Phippsburg, CO 231C3

Coverage Study
11-24-2008

KEZZ CH231 C2 7.0 kW 3130.5M COR
Prot. = 60 dBu.

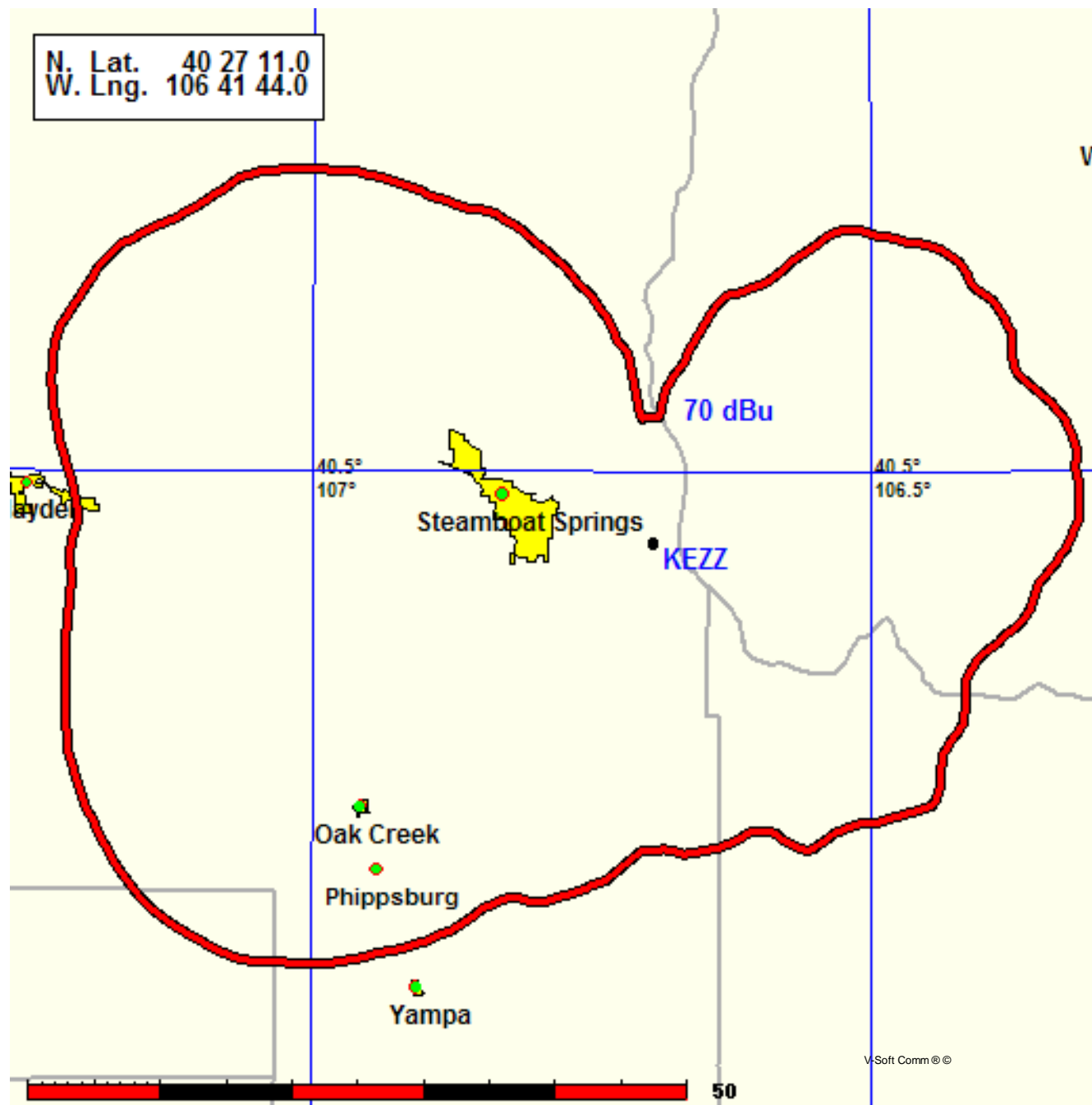


Exhibit E-1, Figure 3, Site Channel Study
KEZZ Phippsburg , CO 231C2

REFERENCE		CLASS = C2	DISPLAY DATES
40 21 16.0 N.			DATA 11-22-08
106 41 55.0 W.	Current Spacings to 3rd Adj.		SEARCH 11-24-08
----- Channel 231 - 94.1 MHz -----			

Call	Channel	Location		Azi	Dist	FCC	Margin
KEZZ.C	CP -N 231C3	Walden	CO	53.2	58.47	177.0	-118.53
KKXK	LIC 231C	Montrose	CO	200.1	238.13	249.0	-10.87
KYSL	LIC 230A	Frisco	CO	150.5	101.71	106.0	-4.29
KRAI-FM	LIC 229C1	Craig	CO	288.1	80.97	79.0	1.97
KRKS-FM	LIC-D 234C	Lafayette	CO	104.9	118.69	105.0	13.69
KEZZ.A	APP 230A	Berthoud	CO	86.1	122.80	106.0	16.80
KJEB.C	CP -N 233C1	New Castle	CO	232.1	101.21	79.0	22.21
KEZZ	RSV 230A	Berthoud	CO	87.1	130.72	106.0	24.72
KMAX-FM	LIC 232C3	Wellington	CO	63.6	146.17	117.0	29.17
KUSZ	LIC-N 230A	Laramie	WY	40.0	143.74	106.0	37.74
KILO	LIC 232C	Colorado Springs	CO	138.1	238.40	188.0	50.40
KSKE-FM	LIC 284C1	Vail	CO	164.9	82.76	27.0	55.76
KJEB	LIC 233C3	New Castle	CO	219.3	112.97	56.0	56.97
NEW.C	CP 228C3	Aspen	CO	191.0	117.47	56.0	61.47
1174201	APP 228A	Aspen	CO	191.0	117.47	55.0	62.47
KNEB-FM	LIC 231C1	Scottsbluff	NE	58.4	294.62	224.0	70.62
1174211	APP 228A	Aspen	CO	185.3	125.83	55.0	70.83
AU7052710	VAC 228A	Aspen	CO	184.6	129.69	55.0	74.69
KXRQ	LIC-Z 232C1	Roosevelt	UT	275.1	255.92	158.0	97.92

Exhibit E-1, Figure 4, KEZZ vs KKXX
KEZZ Phippsburg, CO 231C2

FMCommander Single Allocation Study
11-24-2008

KEZZ CH 231 C2
0.82 kW 3232 M COR
Prot. = 60 dBu
Intef. = 40 dBu

KKXX CH 231 C BLH19961009KC
100.0 kW, 3120 M COR
Prot. = 60 dBu
Intef. = 40 dBu

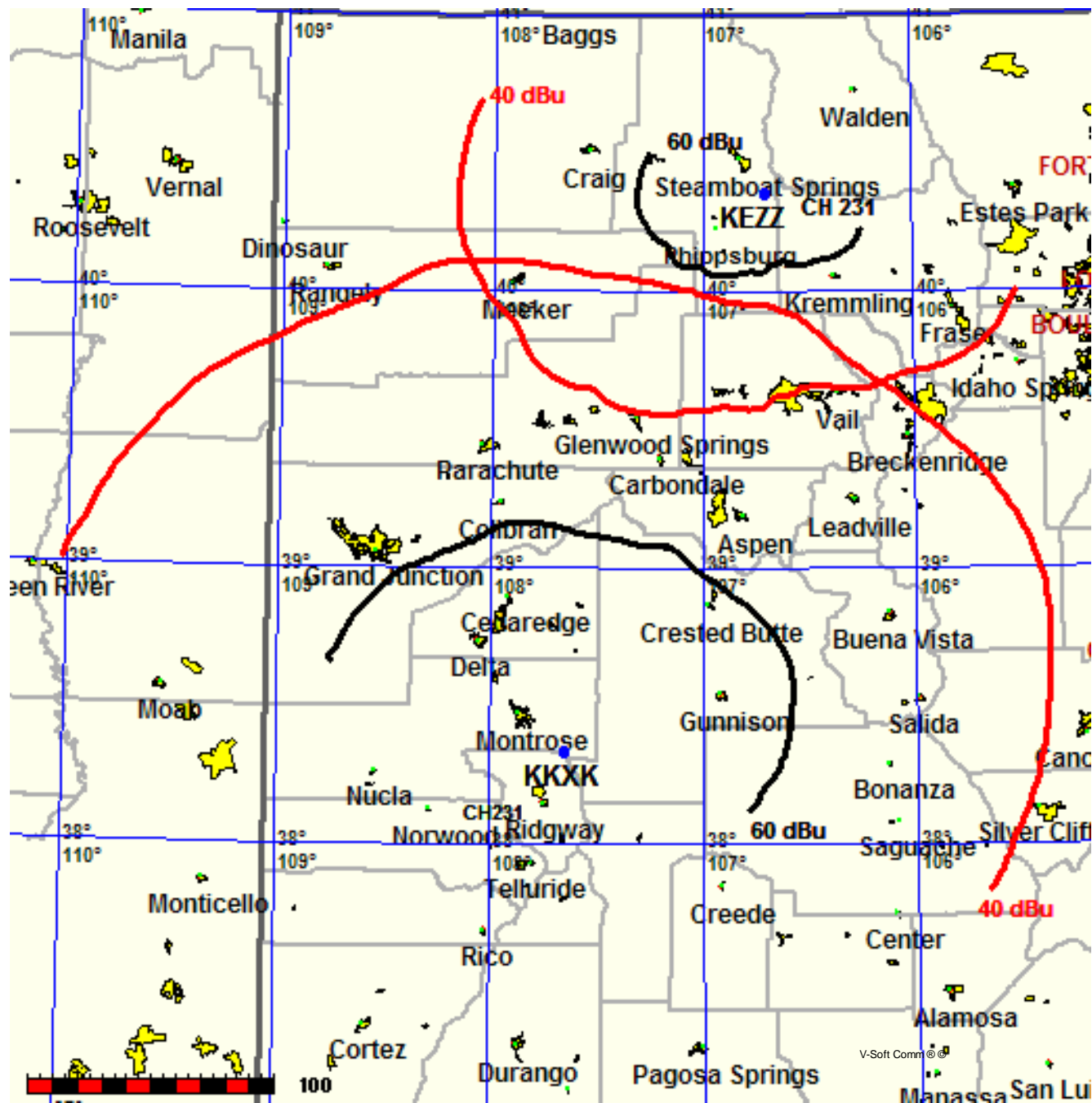


Exhibit E-1, Figure 5B, KEZZ vs KYSL magnified
KEZZ Phippsburg, CO 231C2

FMCommander Single Allocation Study
11-24-2008

KEZZ CH 231 C2
0.82 kW 3232 M COR
Prot. = 60 dBu
Intef. = 54 dBu

KYSL CH 230 A BLH19940808KA
6.0 kW, 3325 M COR
Prot. = 60 dBu
Intef. = 54 dBu



Exhibit E-1, Figure 5, KEZZ vs KYSL
KEZZ Phippsburg, CO 231C2

FMCommander Single Allocation Study
11-24-2008

KEZZ CH 231 C2
0.82 kW 3232 M COR
Prot. = 60 dBu
Intef. = 54 dBu

KYSL CH 230 A BLH19940808KA
6.0 kW, 3325 M COR
Prot. = 60 dBu
Intef. = 54 dBu

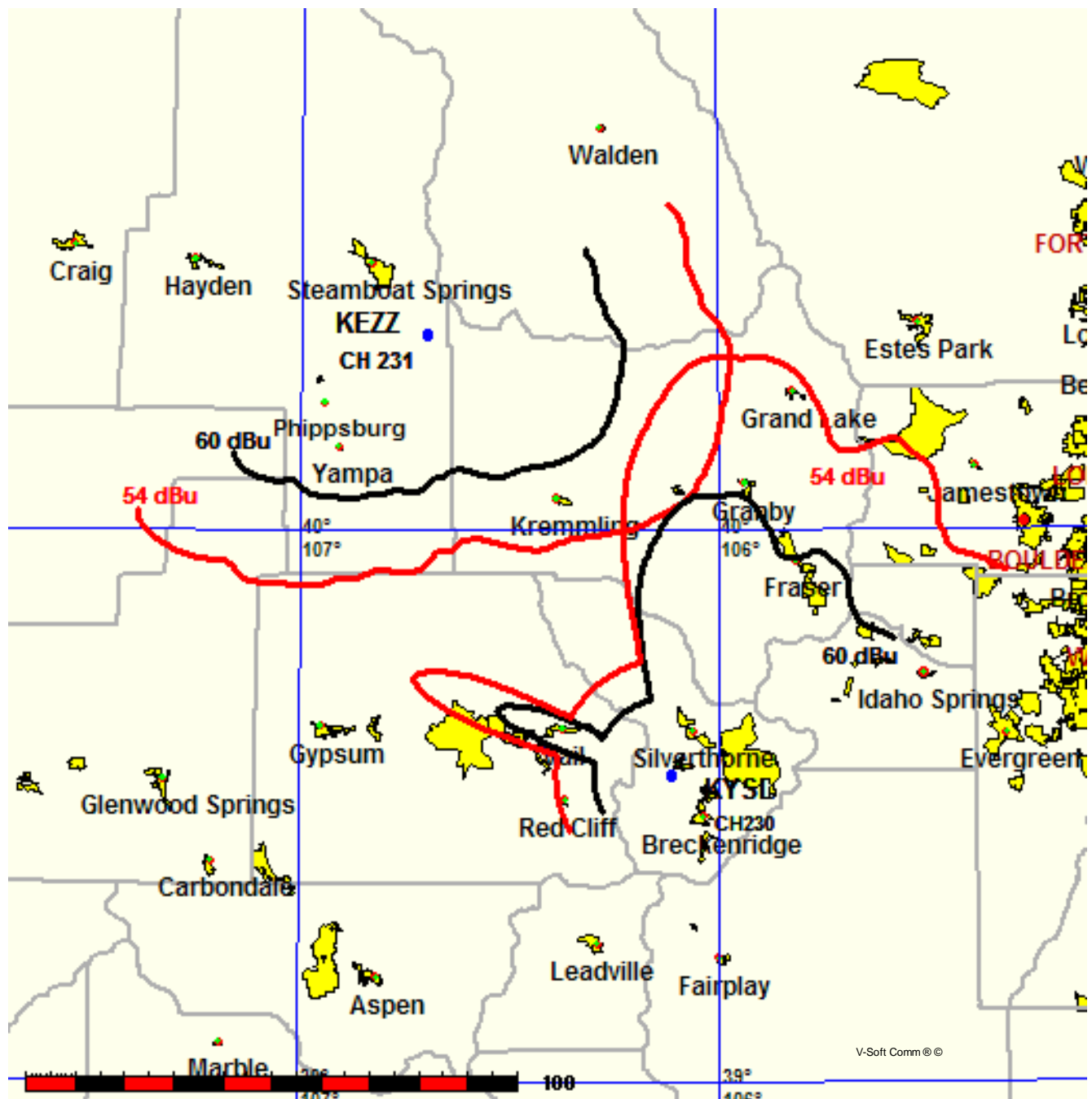
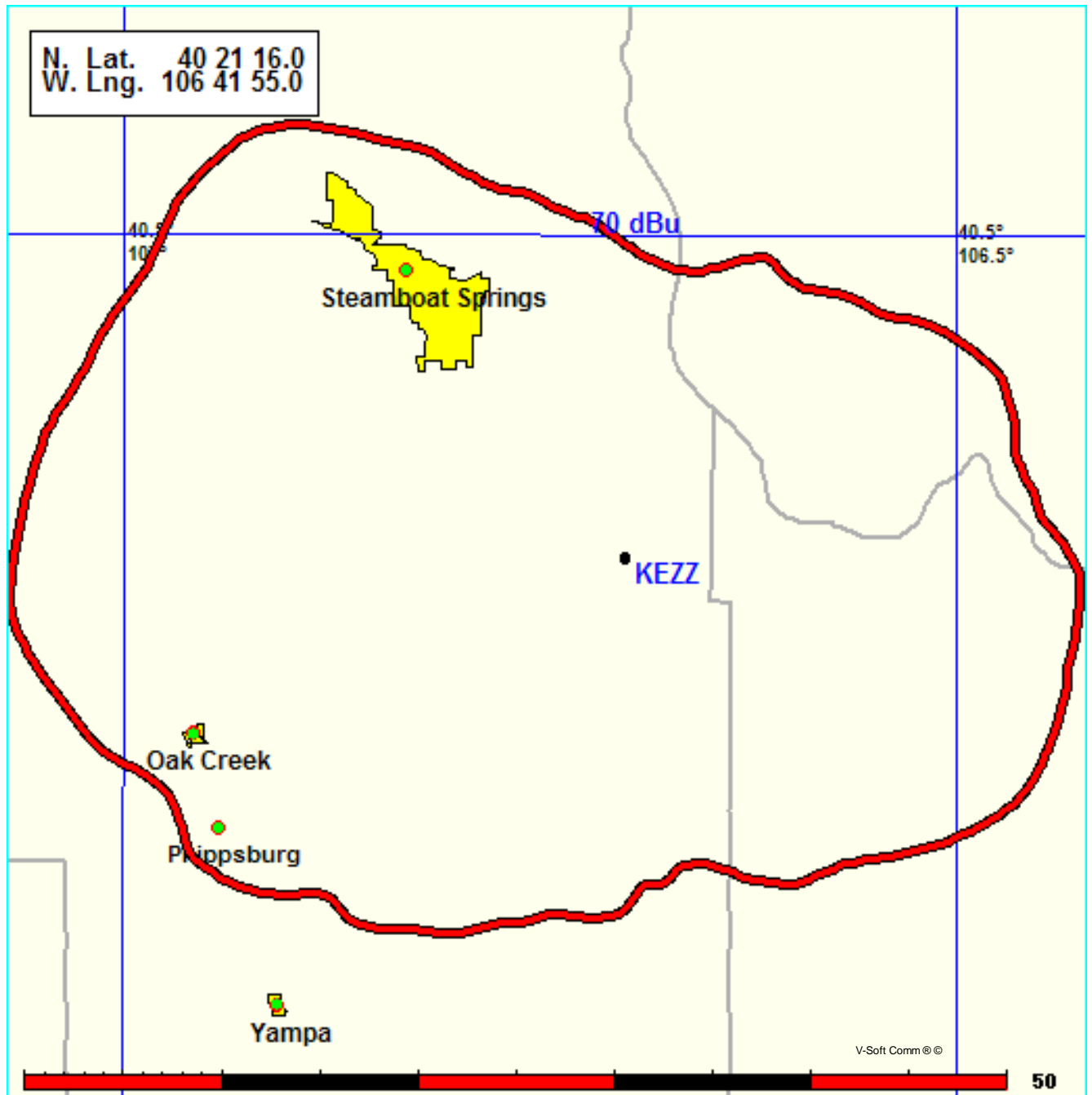
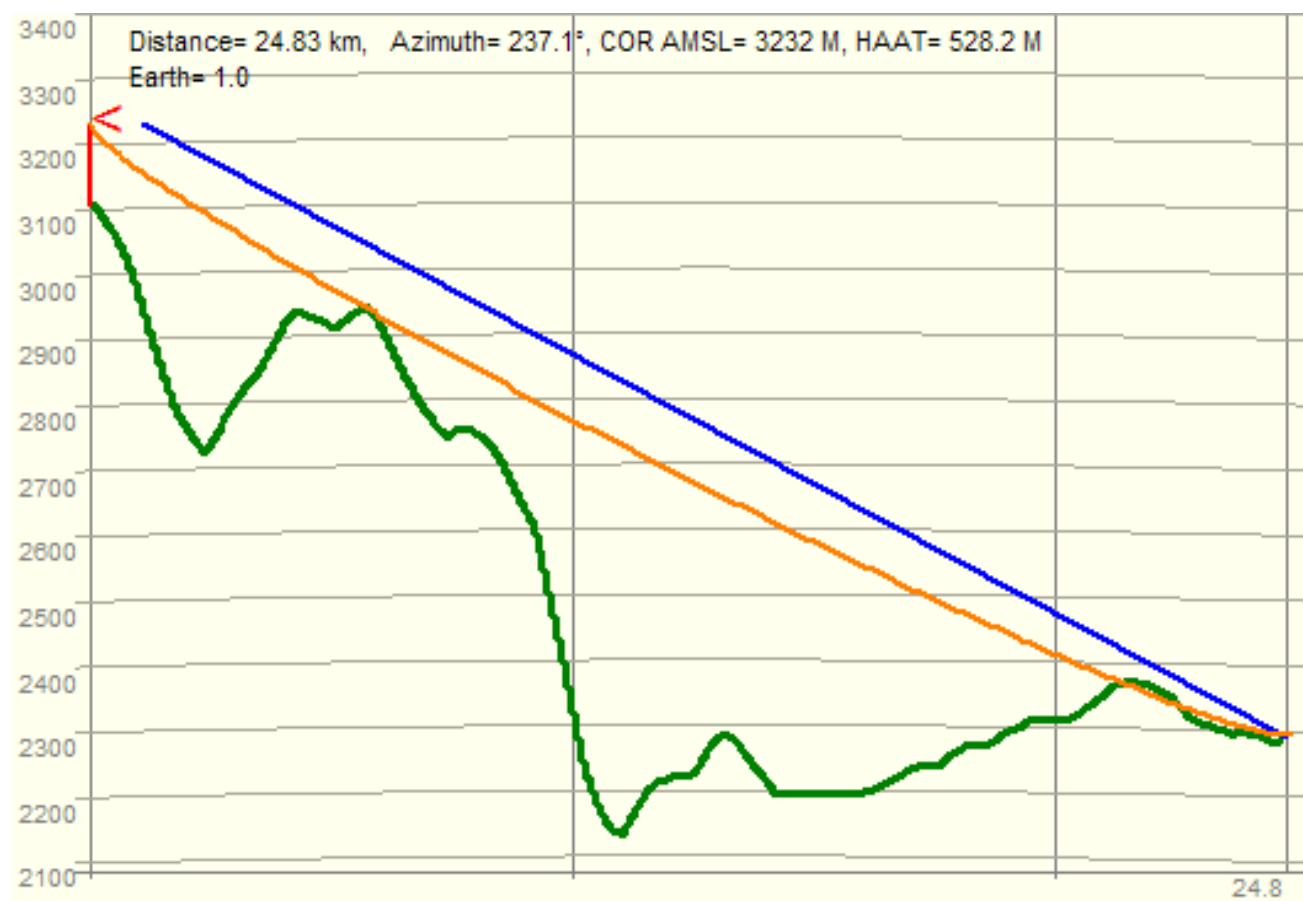


Exhibit E-1, Figure 6, Site Community Coverage
KEZZ Phippsburg, CO 231C2

Coverage Study
11-24-2008

KEZZ CH231 C2 0.82 kW 3232M COR
Prot. = 60 dBu.





KEZZ

Latitude: 40-21-16 N
Longitude: 106-41-55 W
ERP: 0.82 kW
Channel: 231
Frequency: 94.1 MHz
AMSL Height: 3232.0 m
Elevation: 3171.847 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

- 1st Service
- 2nd Service
- 3rd or More Service

