

**Exhibit B-16**  
**KMJY-FM 283C1 Newport, Washington**  
**Allocation Study**

**Spacing Study**

A single set of coordinates are specified as both the Channel 283C1 allotment site and the proposed transmitter site. The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C1 stations as prescribed in §73.207 of the Commission's Rules to all domestic stations.

An apparent short-spacing to the licensed KEEH Spokane operation on Channel 284A is moot, as the Report and Order in MM Docket No. 98-74 approved the cross-channel upgrade of KEEH on Channel 285C2. The Commission has subsequently granted a construction permit for KEEH on Channel 285C1 (FCC File No. BPH-20010119AFF).

The proposed operation is short-spaced to three Canadian stations, which are discussed separately below. It should be noted that a directional antenna pattern is specified in this application, to provide the necessary interference and contour protection vis-a-vis these Canadian stations.

**CHRT-FM 281B Trail, British Columbia**

The proposed operation is short-spaced to Canadian station CHRT-FM, which operates on Channel 281B at Trail, British Columbia. Under the terms of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the required co-channel Class C1 to Class B spacing is 115 kilometers, whereas the distance between the proposed KMJY site and CHRT-FM site is 91.69 kilometers. The attached allocation study map demonstrates that the proposed KMJY 74 dBu F(50,10) contour will not overlap the CHRT-FM 54 dBu F(50,50) contour at any location over

Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CHRT-FM 54 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 65 kilometers.

The proposed operation meets the domestic Class C1 to Class B/C2 spacing requirement of 79 kilometers with respect to CHRT-FM. Therefore, no analysis with respect to interference received from CHRT-FM is required in this application.

#### **CKLZ-FM 284C Kelowna, British Columbia**

The proposed operation is short-spaced to Canadian station CKLZ-FM, which operates on Channel 284C at Kelowna, British Columbia. Under the terms of the Working Arrangement, the required co-channel Class C1 to Class C spacing is 230 kilometers, whereas the distance between the proposed KMJY site and CKLZ-FM site is 225.7 kilometers. The attached allocation study map demonstrates that the proposed KMJY 48 dBu F(50,10) contour will not overlap the CKLZ-FM 58 dBu F(50,50) contour at any location over Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CKLZ-FM 58 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 97 kilometers.

The proposed operation meets the domestic Class C1 to Class C spacing requirement of 209 kilometers with respect to CKLZ-FM. Therefore, no analysis with respect to interference received from CKLZ-FM is required in this application.

#### **CKKR-FM 284C Cranbrook, British Columbia**

The proposed operation is short-spaced to Canadian station CKKR-FM, which operates on Channel 284C at Cranbrook, British Columbia. Under the terms of the Working Arrangement, the required co-channel Class C1 to Class C spacing is 230 kilometers, whereas the distance between the proposed KMJY site and CKKR-FM site is 167.8 kilometers. The attached allocation study map demonstrates that the proposed KMJY 48 dBu F(50,10) contour will not overlap the CKKR-FM 58 dBu F(50,50) contour at any

location over Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CKKR-FM 58 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 97 kilometers.

Since the distance between the proposed KMJY site and the CKKR-FM site is also less than the domestic Class C1 to Class C spacing requirement of 209 kilometers, this map also demonstrates that the proposed KMJY 60 dBu F(50,50) contour will not receive overlap from the CKKR-FM 54 dBu F(50,10) contour. The CKKR-FM 54 dBu F(50,10) contour has been calculated assuming operation with maximum Class C facilities of 100 kW ERP at 600 meters HAAT.

### **Conclusion**

Based on the foregoing allocation study, the proposed operation is believed to be in full compliance with domestic and international allotment requirements. Referral of this proposal to Canadian authorities for their concurrence is respectfully requested.

FM Database Date: 020419

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Longitude: 117 14 15

Safety Zone: 50 km

Job Title: KMJY 283C1 at Moon Hill

[illegible]

KDRK-FM	SPOKANE	229C	56.000	47-34-13	172.7	91.41	41
LIC	WA BMLH-001107AAD	93.7	725.0	117-05-00		50.41	CLEAR

KDRK-FM SPOKANE	229C	64.000	47-34-14	172.7	91.39	41
CP WA BPH-010619AAN	93.7	739.0	117-04-55		50.39	CLEAR

KYWL	SPOKANE	280C2	5.500	47-36-04	183.0	87.37	79
LIC	WA BLH-980828KC	103.9	432.0	117-17-53		8.37	CLOSE

KYWL	SPOKANE	280C1	39.000	47-36-04	183.0	87.37	82
CP	WA BPH-010119AFK	103.9	432.0	117-17-53	SS	5.37	CLOSE

CHRT-FM TRAIL	281B	0.100	49-06-11	330.7	91.69	115
LIC BC	104.1	825.0	117-51-09		-23.31	SHORT
NOTE: DOMESTIC C1-TO-C2/B	SPACING IS 79 KM					

KZBE	OMAK	282C2	3.500	48-19-12	268.4	170.69	158
LIC	WA BLH-991018ABQ	104.3	299.0	119-32-18		12.69	CLEAR

KHTR	PULLMAN	282C1	24.000	46-48-40	172.0	176.75	177
LIC	WA BLH-870112KB	104.3	509.0	116-54-55		-0.25	SHORT

KMJY-FM NEWPORT	283C2	0.930	48-19-54	98.3	40.80	224
CP WA BPH-010119AFE	104.5	874.0	116-41-35		-183.20	SHORT

CKKR-FM CRANBROOK	284C	1.260	49-27-34	43.9	167.79	230
LIC BC	104.7	1048.0	115-37-44		-62.21	SHORT
NOTE: DOMESTIC C1-TO-C SPACING IS 209 KM						

CKLZ-FM KELOWNA	284C	36.000	DA	49-46-06	313.9	225.74	230
LIC BC	104.7	115.0		119-29-59		-4.26	SHORT
NOTE: DOMESTIC C1-TO-C SPACING IS 209 KM							

[illegible]

Channel: 283C1 104.5 MHz Page 2

Latitude: 48 23 9

Longitude: 117 14 15

Safety Zone: 50 km

Job Title: KMJY 283C1 at Moon Hill

[illegible]

KEEH	SPOKANE	284A	0.320	47-34-45	182.8	89.80	133
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LIC	WA	BLH-930629KB	104.7	420.0	117-17-48	-43.20	SHORT
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NOTE: TO MOVE TO 285C2 PER MM DOC 98-74, AND 285C1 PER BPH-20010119AFF

BC	-	104.9	0.0	117-30-00	22.73	CLEAR
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E116	WA	DEF	3000000000	10.1.15	12.1.15	11.7.15	31.1.15	10.1.15	SHORT
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01	WA	DTH	010115RTH	101.5	172.0	117	17	10	35	7.00	0605E
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44444 END OF FM SPACING STUDY FOR CHANNEL 283 44444



