

## **Exhibit E-28**

The proposed facility would be short spaced at the proposed site to KMXP(FM) at Phoenix, Arizona, and a vacant allocation at Salome, Arizona (RM-8901). As a result of these short spacings, the applicant proposes the use of contour protection under Section 73.215 of the Commission's Rules. This exhibit contains both a single channel spacing study, and two allocation maps, which demonstrate that the facility would be in compliance with the provisions of Section 73.215.

The single channel spacing study illustrates multiple short spacing conditions in addition to the two previously mentioned. Those indicating various rulemakings for Wickenburg are moot as they either pertain to the allocation for the facility, or concluded rulemakings in which no channel was allocated. Those spacings indicated for Congress, Bagdad, and Winona, are all rulemakings, which were denied by the Commission on various dates, and are irrelevant. Elimination of these other entries leaves only the KMXP and Salome entries as pertinent.

The two coverage maps contained in this exhibit demonstrate that through the use of contour protection, no prohibited overlap would exist between KSWG and the facilities in question. Since Salome is a vacant allocation, its operation was assumed to be located at the reference coordinates for the allocation. In

addition, since the allocation is for a class A facility, operation with 6 kW ERP at a center of radiation of 100 meters above average terrain at that site was utilized.

In the case of KMXB, that facility is a class C facility operating with an effective radiated power of 100 kW at a center of radiation of 475 meters above average terrain. Even under the change in the rules with the class C0, KMXB would remain as a class C. Therefore, under the provisions of Section 73.215, the center of radiation of this facility for the purposes of this study was increased by 125 meters to 600 meters above average terrain. The contours depicted on these maps represent these changes.

The proponent is utilizing a directional antenna to provide the required protection to KMXB and the vacant allocation at Salome. Although the relative field values for the antenna were entered in the tech-box portion of FCC form 301, additional information regarding the proposed directional pattern is contained in this exhibit. Specifically, a tabulation of the relative field values, horizontal plane radiation plot in relative field, and horizontal plane radiation plot in relative dB have been included.

KSWG 242C3 at Current Site  
D.L. Markley & Associates Inc.

REFERENCE  
33 55 34 N  
112 47 40 W

CLASS = C3  
Current Spacings

DISPLAY DATES  
DATA 10-05-01  
SEARCH 10-05-01

----- Channel 242 - 96.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 242C3	Wickenburg	AZ 8.95	37.5	153.0	-144.05
ALLO	VAC 242C3	Wickenburg	AZ 13.57	41.9	153.0	-139.43
RADD	ADD 242C3	Wickenburg	AZ 13.57	41.9	153.0	-139.43
RDEL	DEL 242C3	Wickenburg	AZ 13.57	41.9	153.0	-139.43
RADD	ADD 242A	Congress	AZ 25.94	350.4	142.0	-116.06
RADD	ADD 242C3	Bagdad	AZ 69.96	332.7	153.0	-83.04
ALLO	VAC 241A	Salome	AZ 77.31	258.2	89.0	-11.69
KMXP	LIC 245C	Phoenix	AZ 94.63	133.9	96.0	-1.37
KZGL	LIC 240C1	Cottonwood	AZ 104.98	36.1	76.0	28.98
RADD	ADD 242C3	Winona	AZ 190.51	41.4	153.0	37.51
KDVA	LIC 295A	Buckeye	AZ 55.79	161.1	12.0	43.79
KLPX	LIC 241C	Tucson	AZ 243.20	139.6	176.0	67.20
KKLZ	LIC 242C	Las Vegas	NV 306.79	319.6	237.0	69.79

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**KSWG**

**PROPOSED**

Latitude: 33-55-34 N  
Longitude: 112-47-40 W  
Power: 6.40 kW  
Channel: 242  
Frequency: 96.3 MHz  
AMSL Height: 943.0 m  
Elevation: 792.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**KMXP**

BMLH19941024KC  
Latitude: 33-20-03 N  
Longitude: 112-03-36 W  
Power: 100.00 kW  
Channel: 245  
Frequency: 96.9 MHz  
AMSL Height: 968.021 m  
Elevation: 749.63 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

**SALOME**

Latitude: 33-46-54 N  
Longitude: 113-36-42 W  
Power: 6.00 kW  
Channel: 241  
Frequency: 533.0 MHz  
AMSL Height: 725.0 m  
Elevation: 575.93 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

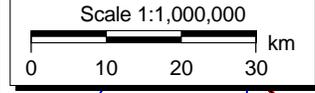
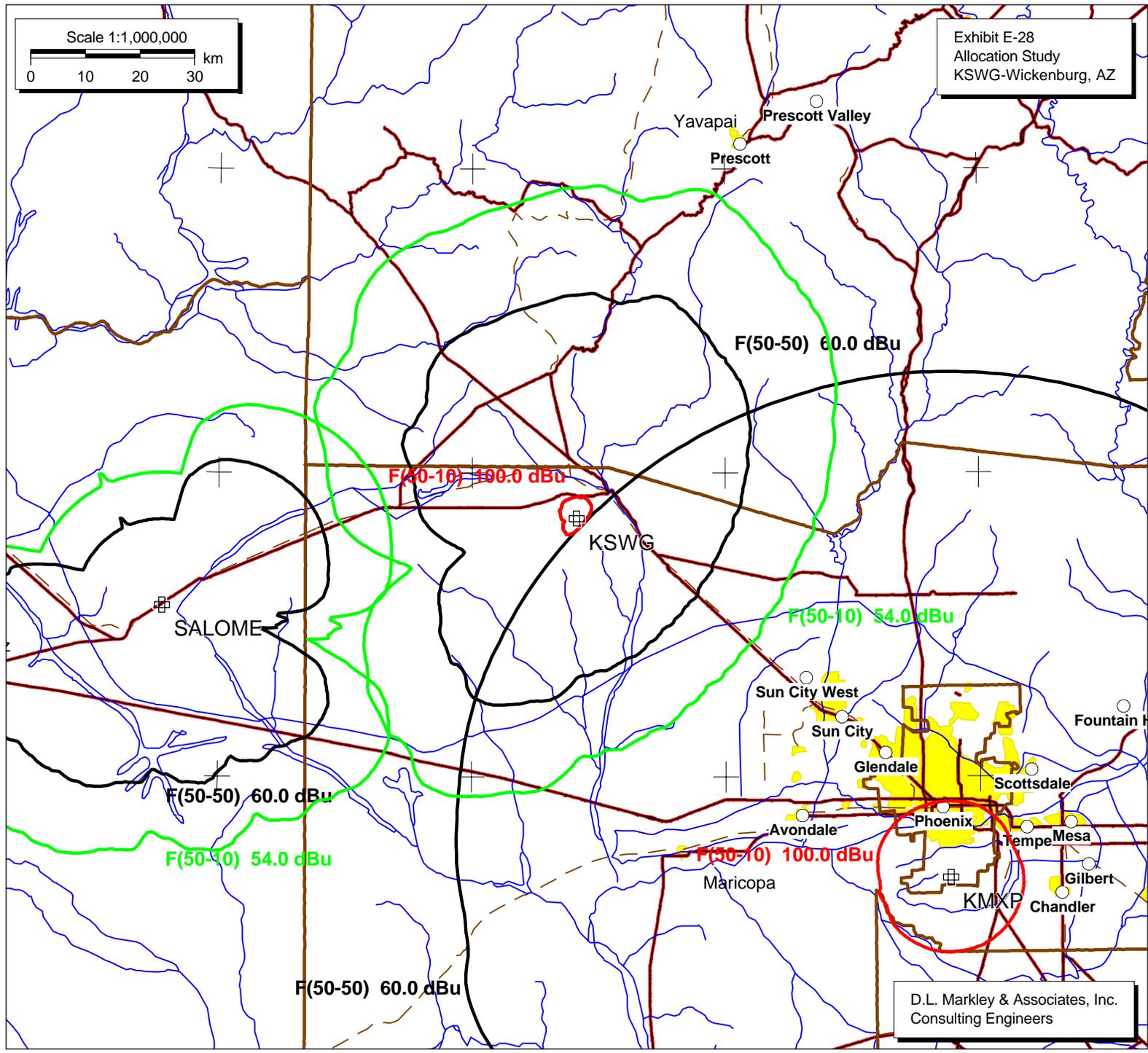


Exhibit E-28  
Allocation Study  
KSWG-Wickenburg, AZ



D.L. Markley & Associates, Inc.  
Consulting Engineers

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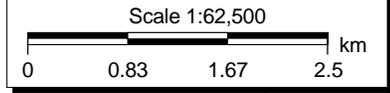
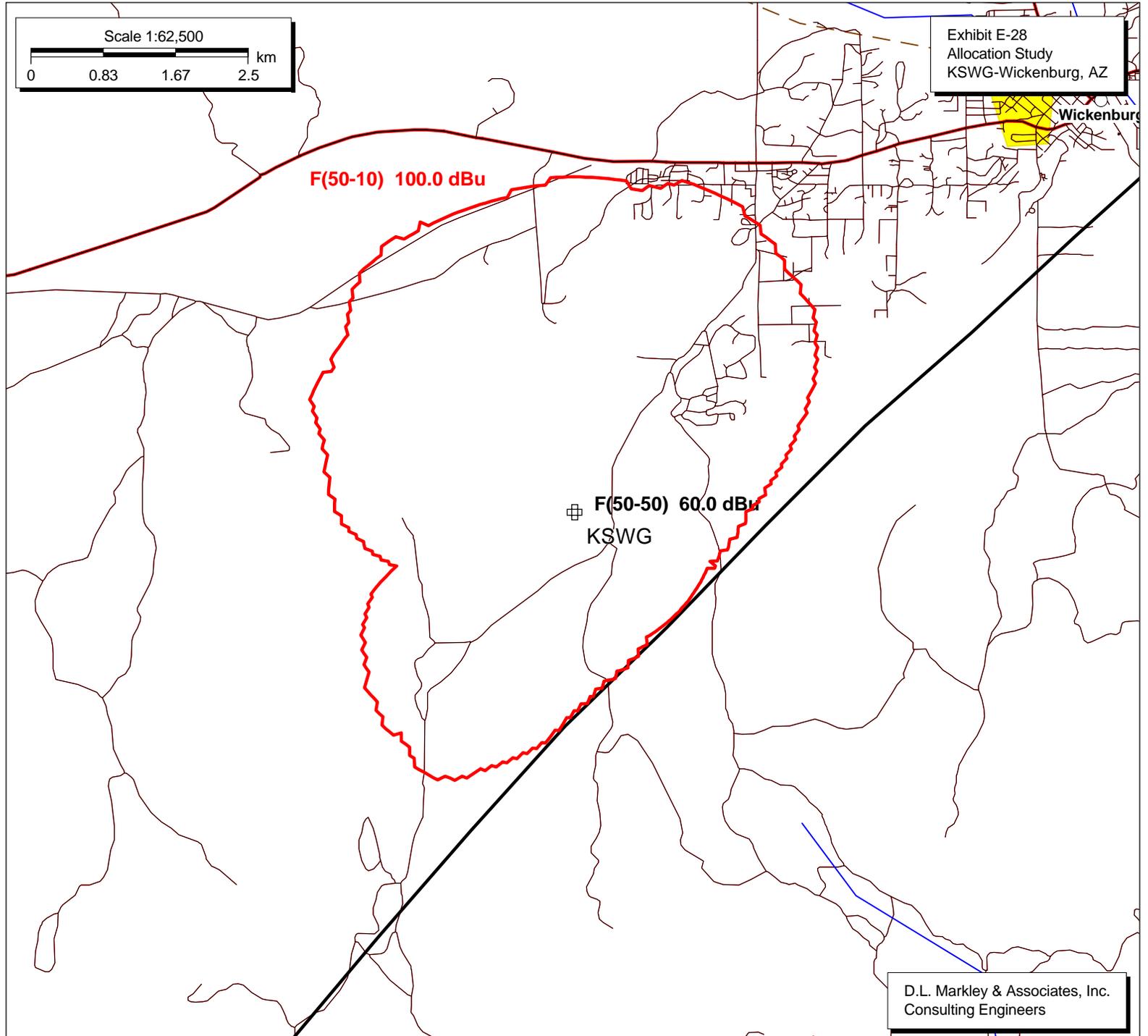


Exhibit E-28  
Allocation Study  
KSWG-Wickenburg, AZ

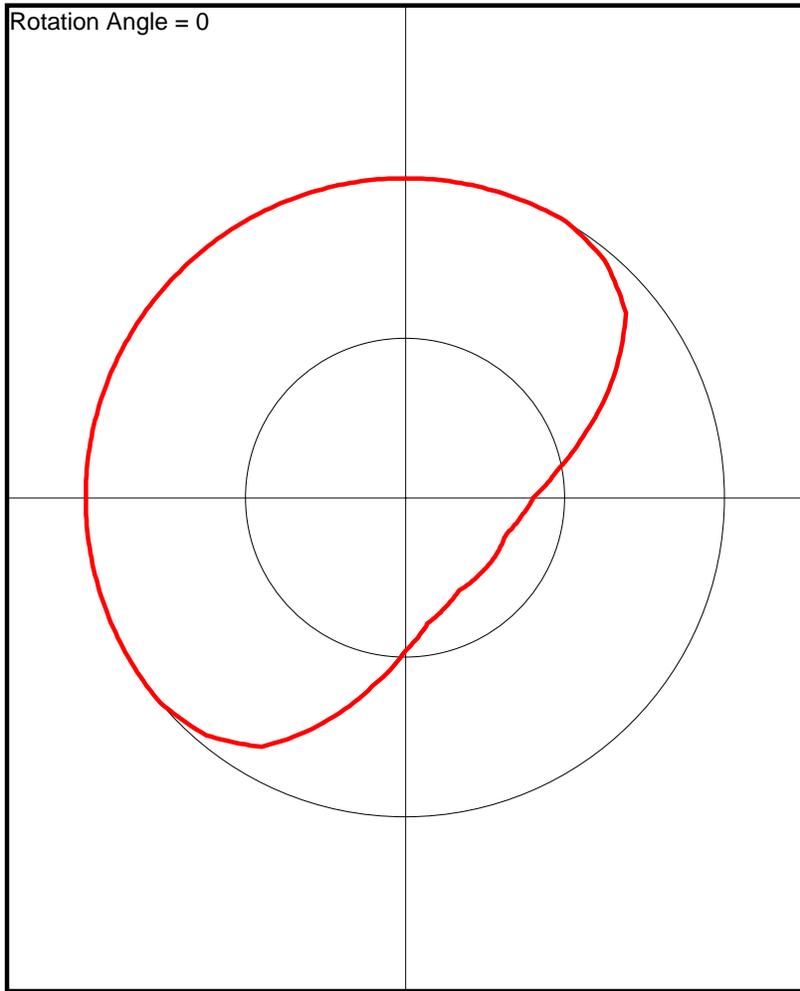


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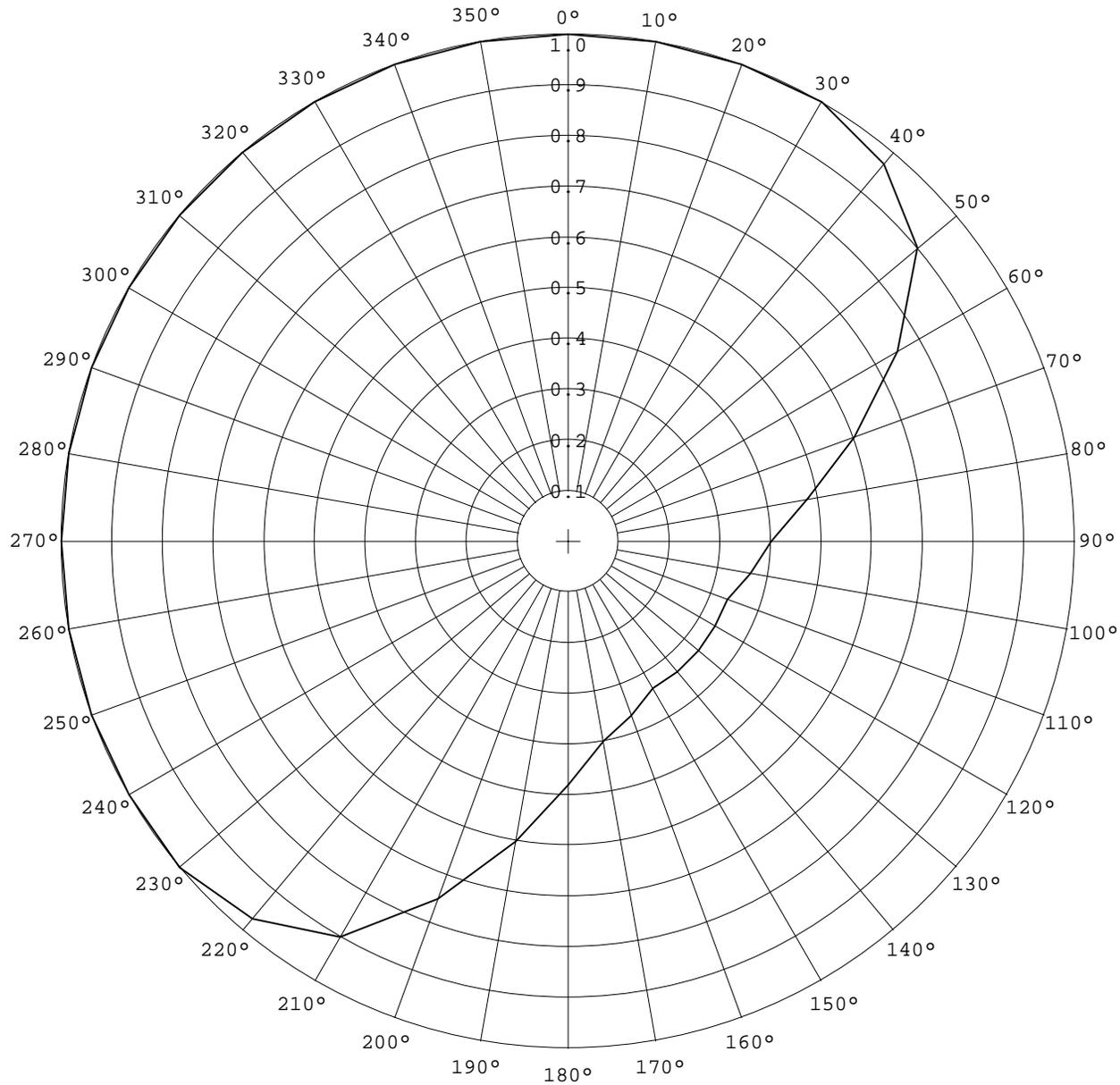
# KSWG Proposed Directional FM Pattern

Pre-Rotation Antenna Pattern....

Azimuth (deg)	Effective Field
0.0	1.000
10.0	1.000
20.0	1.000
30.0	1.000
40.0	0.970
50.0	0.900
60.0	0.750
70.0	0.600
80.0	0.480
90.0	0.400
100.0	0.365
110.0	0.335
120.0	0.335
130.0	0.335
140.0	0.335
150.0	0.335
160.0	0.365
170.0	0.400
180.0	0.480
190.0	0.600
200.0	0.750
210.0	0.900
220.0	0.970
230.0	1.000
240.0	1.000
250.0	1.000
260.0	1.000
270.0	1.000
280.0	1.000
290.0	1.000
300.0	1.000
310.0	1.000
320.0	1.000
330.0	1.000
340.0	1.000
350.0	1.000



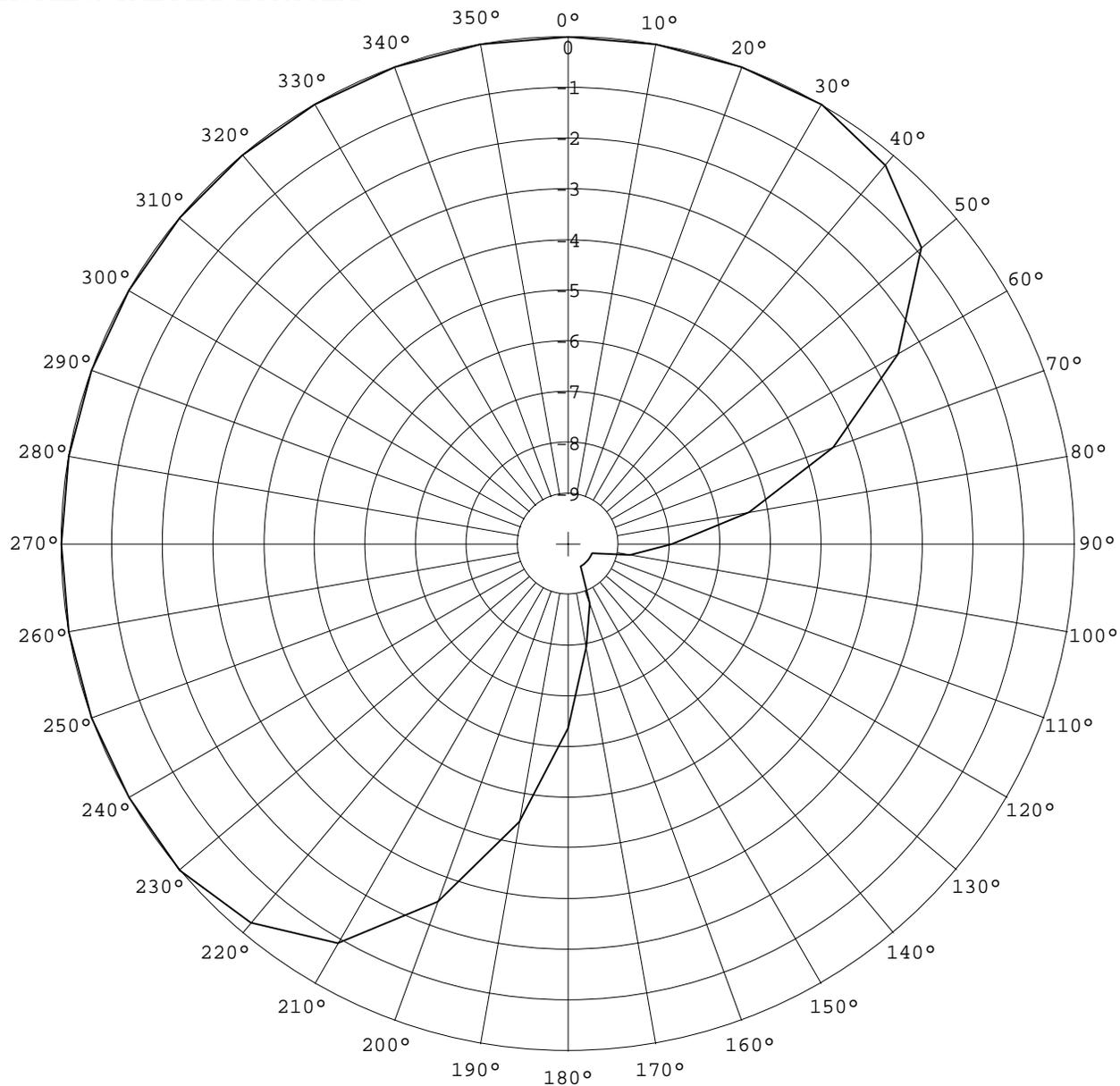
HORIZONTAL PLANE PATTERN



Relative Intensity

Pattern file: KSWG.pat

# HORIZONTAL PLANE PATTERN



Relative dB

Pattern file: KSWG.pat