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**Engineering Statement**

This engineering exhibit was prepared in support of an application to change the transmitter site and make related power and antenna changes at KWAC, Bakersfield, California (facility ID 35109) which currently operates with 1 KW fulltime into a nondirectional antenna. The proposed facility will share the current facilities of KGEO (AM) (facility ID 36233) and will operate with reduced input power to avoid increasing existing contour overlaps. The proposed facility will not cause or receive additional objectionable interference, and is in compliance with all current FCC rules and policies.

The proposed tower already exists and no tower modifications are required to implement this proposal. The existing shunt feed system will be adjusted to allow both stations to reliably excite the tower, and appropriate diplexing equipment will be installed to properly isolate the transmissions. A formal agreement fixing responsibility for continued proper operation and maintenance thereof will be executed prior to first operation of this new facility.

**Radio Frequency Radiation Exposure Statement**

The proposed facility will share the tower used by 1 KW KGEO. The tower is secured behind a locked fence and gate, and is fenced to the distances required by the FCC OST-65 bulletin for 2 KW. No changes in the fence is required. There is no RF radiation exposure hazard to the general public as the fence is farther away from the towers than the current ANSI and FCC standards require. When workers must enter the fenced area, climb the tower or otherwise place themselves into a situation which could result in overexposure, the station(s) will either reduce power or cease transmitting entirely to protect the workers as necessary. The only access to the towers and their immediate area will be through the locked gates, controlled by the permittee.

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### **Daytime Allocation Study & Existing Overlap Areas**

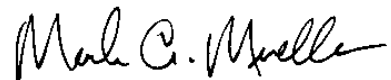
The currently licensed KWAC antenna system has prohibited contour overlap with KBKO, Santa Barbara, CA. The existing caused overlap to KBKO is reduced with no new caused area. The received overlap from KBKO is reduced by 165.2 square kilometers, with a new received overlap area of 132.2 square kilometers, for a net reduction of 33 square kilometers. An auction 84 application filed by first-adjacent KIEV does not properly protect KWAC and others, however it is believed that the proposed facility is in full compliance with the FCC rules at 47 CFR 73.37 Note 1 when measured data (attached) is considered.

### **Community of License Coverage**

The proposed facility will not provide 80% coverage of Bakersfield with it's 50% RSS nighttime interference-free contour, nor 100% coverage of Bakersfield with it's 5 mv/m contour. This is due mostly to annexation along an east-west corridor along the river which has resulted in boundary "wings" to the east and west of the central city. The currently licensed KWAC facility also fails to completely cover Bakersfield day and night, and the proposed facility improves this deficiency slightly. Daytime, the 5 mv/m contour has a "loss area" of 3.8 square kilometers with a "gain area" of 4.6 square kilometers for a net gain of 0.8 square kilometers. Nighttime, the loss area is 26.8 square kilometers with a gain area of 60.4 square kilometers, for a net gain of 33.6 square kilometers. Since the end effect is increased compliance with 47 CFR 73.24(i) it is believed no waiver is required.

This engineering exhibit was prepared by me and is true and correct to the best of my knowledge and belief.

August 20, 2007



Mark A. Mueller