

KUNV, LAS VEGAS, NV

EXHIBIT 13 - NARRATIVE

## ENGINEERING STATEMENT

Board of Regents, Nevada System of Higher Education ("NSHE") is the licensee of KUNV(FM), Las Vegas, Nevada (BLED-19840906DM, FCC ID number 68921). In the instant application, NSHE proposes to upgrade the facilities of KUNV by changing the transmission site, the ERP and adding a directional antenna.

See the RFR Study, Exhibit 22 for a detailed summary of the antenna and tower proposed. Exhibits 13.1 and 13.2 contain a polar plot and a tabulation of the proposed directional pattern. This pattern meets the front-to-back ratio and slope limitations of 47 CFR §§73.316(b) and 73.510(b).

Exhibit 14 is a contour map of the predicted community coverage from the NSHE proposal. The 60 dBu F(50,50) contour is predicted to enclose 100 percent of the community area and population (2000 Census, block data). Thus the NSHE proposal meets the requirements of 47 CFR §73.515.

Exhibit 15 contains the spacing study of the NSHE proposal, showing that the proposal is clear to all records in the database, except where noted. The proposal is clear to all international borders, observatories, and monitoring stations.

Exhibits 16 through 16.3 are contour maps of the NSHE proposal into the short records, BPED-19970822MA, KWTH, KVKL-LIC and KVKL-CP. Note that the licensed KVKL and KUNV facilities protect each other completely, but that the KVKL permit (BMPED-20070305ABP) receives considerable interference from KUNV. The NSHE proposal would reduce the population in the interference contour dramatically, but would also create a very small area of interference to the licensed KVKL facility. Note that the NSHE proposal would overlap the KVKL site, but that the impacted population would be zero. All data are based on the 2000 Census, block data. The populations which would receive interference under the two scenarios can be summarized as follows:

	KUNV-LIC		PROPOSAL	
	Received	Given	Received	Given
KVKL-LIC	0	0	0	6
KVKL-CP	0	73,565	0	28

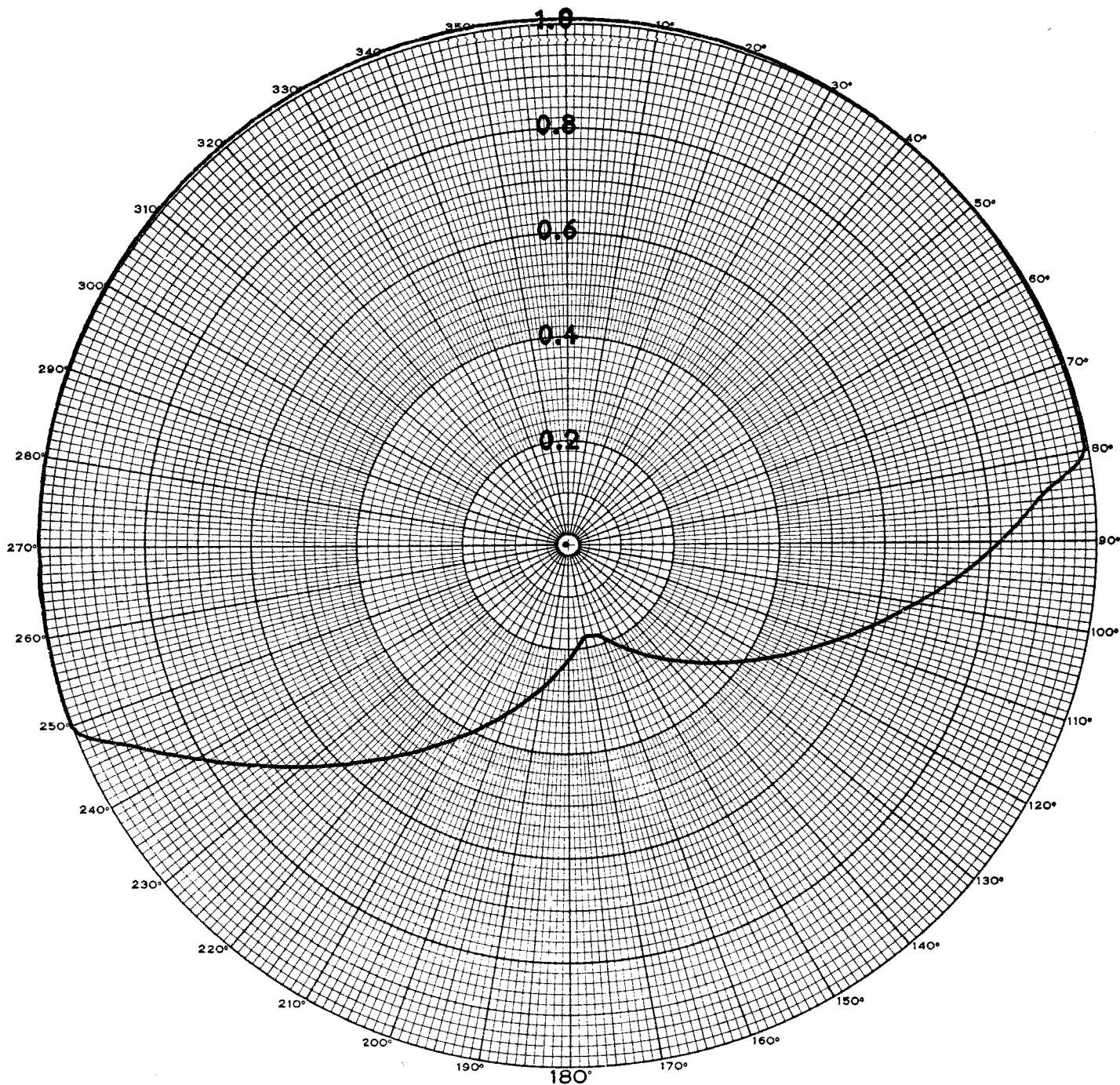
Exhibit 19 is a contour map of the NSHE proposal into KMOH-TV, showing that the proposal clears the KMOH contour. The above exhibits, with the exception noted, show that the proposal meets the requirements of 47 CFR §§73.509(a) and 73.525. NSHE respectfully requests a waiver of 73.509(a) relative to KVKL.

Exhibit 22 contains a study of the radio-frequency radiation impact of the NSHE proposal, showing that the general public and workers would be protected from exposure to radiation in excess of the limits contained in 47 CFR §1.1310. No other environmental impact is known to result from the NSHE proposal.

The above and attached information is true and correct as to my knowledge and belief.

September 7, 2007

  
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Gary O. Keener



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*KUNV, LAS VEGAS, NV EXHIBIT 13.1*  
**PROPOSED PATTERN - POLAR PLOT**

**PROPOSED PATTERN - TABULATION**

KUNVP Pattern  
HORIZONTAL PLANE PATTERN  
Pattern RMS 0.811 Field

Azimuth	Field	dBk	ERP(kW)	Azimuth	Field	dBk	ERP(kW)
0	1.000	+12.67	18.5	180	0.224	-0.31	0.931
5	1.000	+12.67	18.5	185	0.250	+0.62	1.153
10	1.000	+12.67	18.5	190	0.278	+1.55	1.429
15	1.000	+12.67	18.5	195	0.309	+2.48	1.770
20	1.000	+12.67	18.5	200	0.344	+3.41	2.192
25	1.000	+12.67	18.5	205	0.383	+4.34	2.716
30	1.000	+12.67	18.5	210	0.426	+5.27	3.364
35	1.000	+12.67	18.5	215	0.475	+6.20	4.167
40	1.000	+12.67	18.5	220	0.528	+7.13	5.162
45	1.000	+12.67	18.5	225	0.588	+8.06	6.395
50	1.000	+12.67	18.5	230	0.654	+8.99	7.922
55	1.000	+12.67	18.5	235	0.728	+9.92	9.814
60	1.000	+12.67	18.5	240	0.811	+10.85	12.2
65	1.000	+12.67	18.5	245	0.902	+11.78	15.1
70	1.000	+12.67	18.5	250	1.000	+12.67	18.5
75	1.000	+12.67	18.5	255	1.000	+12.67	18.5
80	1.000	+12.67	18.5	260	1.000	+12.67	18.5
85	0.900	+11.75	15.0	265	1.000	+12.67	18.5
90	0.825	+11.00	12.6	270	1.000	+12.67	18.5
95	0.749	+10.16	10.4	275	1.000	+12.67	18.5
100	0.674	+9.24	8.397	280	1.000	+12.67	18.5
105	0.605	+8.31	6.778	285	1.000	+12.67	18.5
110	0.544	+7.38	5.472	290	1.000	+12.67	18.5
115	0.489	+6.45	4.417	295	1.000	+12.67	18.5
120	0.439	+5.52	3.566	300	1.000	+12.67	18.5
125	0.394	+4.59	2.878	305	1.000	+12.67	18.5
130	0.354	+3.66	2.324	310	1.000	+12.67	18.5
135	0.318	+2.73	1.876	315	1.000	+12.67	18.5
140	0.286	+1.80	1.514	320	1.000	+12.67	18.5
145	0.257	+0.87	1.222	325	1.000	+12.67	18.5
150	0.231	-0.06	0.987	330	1.000	+12.67	18.5
155	0.208	-0.99	0.797	335	1.000	+12.67	18.5
160	0.186	-1.92	0.643	340	1.000	+12.67	18.5
165	0.180	-2.23	0.599	345	1.000	+12.67	18.5
170	0.181	-2.17	0.607	350	1.000	+12.67	18.5
175	0.202	-1.24	0.752	355	1.000	+12.67	18.5