

Exhibit B  
Narrative Description and Request for Expedited Treatment

The instant application seeks authority to conform the license for KTRR(FM), Loveland, Colorado, to the facilities for that station as constructed. Station KTRR is licensed to broadcast at 50 kW ERP on a directional antenna. The current licensee, Regent Broadcasting of Ft. Collins, Inc. ("Regent"), recently acquired station KTRR, and in the course of its due diligence on the facility Regent discovered that the directional antenna was installed improperly, such that it was in fact broadcasting an omnidirectional signal. The licensee therefore applied for and received special temporary authority ("STA") to reduce power and broadcast an omnidirectional signal at 30 kW ERP.

Since then, Regent has been actively pursuing ways to restore full service to the listeners of KTRR, and has determined (as described more fully elsewhere in this application) that it may increase power to 50 kW ERP with an omnidirectional signal without causing any impermissible interference. Regent therefore is submitting this application to conform the license for station KTRR with the facilities for that station as constructed.

Regent respectfully requests expedited treatment of this application. KTRR's reduction in power has meant that the listening public in KTRR's community of license has been deprived of the level of service which is their due. The public interest would be served by expedited consideration of this application, in order to permit Regent to restore full service as quickly as possible.

Exhibit C  
Protection of Table Mountain Radio Receiving Zone

Station KTRR(FM) was originally licensed with a directional signal in order to protect the Table Mountain Radio Receiving Zone in Boulder, Colorado, in accordance with Section 73.1030(b) of the Commission's rules. Regent has consulted and coordinated with radio engineers at the Department of Commerce listening facility at Table Mountain, and has determined that operation of station KTRR in accordance with the authorization applied for herein will not produce an impermissible level of interference at the Table Mountain listening facility.

Station KTRR, which broadcasts at 102.5 MHz, may not produce a field strength at the Table Mountain Facility in excess of 10 mV/m, or a power flux density in excess of  $-65.8$  dBW/m<sup>2</sup>. Regent has determined that KTRR would, at the nearest point within the Table Mountain facility, produce a field strength of 1.2 mV/m and a power flux density of  $-84$  dBW/m<sup>2</sup>. The field strength and power flux density for this station will therefore be well below the maximum limits permitted under section 73.1030 of the Commission's rules.

Moreover, Regent has successfully coordinated with the Table Mountain facility. The Department of Commerce Radio Frequency Management Office noted that there is significant terrain attenuation between Table Mountain and the KTRR transmitter site, and concluded that the proposed emission levels are "below the maximum permissible." A copy of the email sent by Department of Commerce staff is attached to this application.

The proposed application therefore complies in every respect with Section 73.1030 of the Commission's rules.

Exhibit D  
Previously Filed Application

On April 30, 2003, Regent filed an FCC Form 301 seeking a construction permit for a minor change in station KTRR's licensed facility, File No. BPH-20030430ACT (the "Relocation Application"). The purpose of that application was to relocate the transmitter for station KTRR and thus to expand the population that would receive its signal. However, the new location proposed for the KTRR transmitter will not become available for at least another year, and perhaps longer. Regent is therefore seeking the instant modification to the KTRR facilities, pending construction of the new facilities in accordance with the Relocation Application.

The instant application is not inconsistent with the Relocation Application, as Regent wishes to restore KTRR to full power as soon as possible and to continue broadcasting in accordance with such authorization for a year or more, until such time as it is able to effect the transmitter relocation. Therefore, this application does not violate the prohibition on filing inconsistent applications contained in section 73.3518 of the Commission's rules.

Neither does the instant application violate the prohibition on repetitious applications contained in section 73.3519 of the Commission's rules, as the Commission has not denied or dismissed with prejudice any "like application" within the past 12 months. Nor does the instant application violate the prohibition on multiple applications contained in section 73.3520 of the Commission's rules, as this application does not seek "new or additional facilities," but instead simply a minor change in the existing authorization, in order to conform the license to the facility as constructed. Filing and grant of this application, notwithstanding the pendency or grant of the Relocation Application, therefore does not run afoul of the Commission's rules.

**EXHIBIT E**

**SUCCESSFUL COORDINATION**

## **Carnell, William (DC)**

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**From:** Jonathan Edwards [Jon@dlr.com]  
**Sent:** Tuesday, May 27, 2003 3:53 PM  
**To:** 'WILLIAM.CARNELL@LW.com'  
**Subject:** FW: Successful Coordination: KTRR-FM Modification Proposal for Loveland, CO

Bill,

Below is the approval from Table Mountain for KTRR-FM.

Regards,  
Jon

-----Original Message-----

From: Teresa Maraia [mailto:Teresa.Maraia@noaa.gov]  
Sent: Wednesday, April 30, 2003 5:18 PM  
To: Jonathan Edwards  
Cc: Paul McKenna; Al Vincent; Bill Kissick  
Subject: Successful Coordination: KTRR-FM Modification Proposal for Loveland, CO

Dear Mr. Edwards,

The Department of Commerce Radio Frequency Management Office evaluated your submitted modification proposal for KTRR-FM in Loveland, Colorado. The minor change application eliminates the omnidirectional antenna and operates non directionally.

The ERP towards the Table Mountain site will be 50 kiloWatts. There is significant terrain attenuation between the transmit location and the Table Mountain Radio Quiet Zone. Our calculation estimates that the KTRR field strength is below the maximum permissible of 80 dBuV/m at this FM frequency (102.5 MHz).

The Radio Frequency Management Office grants successful coordination for this KTRR proposal.

This evaluation is based upon information submitted in your April 17, 2003, email and not on actual signal strength. The Department of Commerce must take field strength measurements of the actual signal strength to ensure that the proper limits are achieved, before the final station license is granted by the FCC.

Thanks for your continued efforts to protect the Table Mountain research facility.

Respectfully,  
Teresa Maraia  
Telecommunications Specialist

Jonathan Edwards wrote:

> Terri,  
>  
> We have prepared an application for FM station KTRR at Loveland, CO. This  
> is for a 50 kW (circularly-polarized) operation on 101.3 MHz. We believe  
> that is it well within the 10 mV/m recommendation for Table Mountain.  
> However, we would like your concurrence before filing with the FCC.  
> Attached is a copy of the prepared technical exhibit.  
>  
> <<KTRR(FM) Exhibit.pdf>>  
>  
> Regards,  
> Jon  
>  
> Jonathan N. Edwards, P.E.  
> Consulting Communications Engineer  
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> e-mail: jon@dlr.com  
>  
> du Treil, Lundin & Rackley, Inc.  
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> Sarasota, Florida 34237  
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> (941) 329-6030 (fax)  
>  
> -----  
> Name: KTRR(FM) Exhibit.pdf  
> KTRR(FM) Exhibit.pdf Type: Acrobat (application/pdf)  
> Encoding: base64  
> Download Status: Not downloaded with message