

ENGINEERING REPORT COVERING  
REQUEST FOR CONSTRUCTION PERMIT  
ON BEHALF OF ROSE CITY RADIO CORPORATION  
FOR STATION KMPC (AM) 1540 KILOHERTZ  
LOS ANGELES, CALIFORNIA

MARCH 2006

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SUMMARY

The engineering exhibit of which this statement is part was prepared on behalf of Rose City Radio Corporation, hereinafter referred to as "Rose City", in support of an application for construction permit for AM station KMPC Los Angeles, California. Rose City is the licensee of KMPC. KMPC is licensed to operate on 1540 kilohertz with power of 50 kilowatts daytime and 10 kilowatts nighttime employing a dual mode directional antenna system. This application proposes minor changes in the KMPC antenna system. Specifically, Rose City seeks to modify the daytime and nighttime directional antenna patterns and increase nighttime power to 46 kilowatts. To implement this change, it will be necessary to relocate tower 3 approximately eight feet from its present location. No other changes are proposed.

### DAYTIME ALLOCATION CONSIDERATIONS

The geographic area encompassed by the KMPC daytime allocation study is vast and as a consequence, a conventional allocation map would be hard to read. Accordingly, two maps which provide greater allocation detail in critical areas are provided in lieu of a single conventional map.

An area of prohibited 0.5 and 0.25 mv/m contour overlap exists between the presently licensed KMPC operation and first adjacent channel station KWRN Apple Valley, California. The proposed KMPC operation will reduce the overlap area for both stations. Figure 1 is a detailed allocation mapping which shows the reduced interference area.

A small area of prohibited 5 mv/m contour overlap exists with second adjacent channel station KVTB Port Hueneme, California. As can be seen on Figure 1, the proposed KMPC operation will reduce this overlap.

KMPC also has prohibited co-channel contour overlap with Mexican station XE Ensenada, Baja California Norte and first adjacent channel XEBG Tijuana, Baja California Norte. The FCC has not accepted either of these facilities and has filed an objection with Mexico. In order to expedite the processing of this application, the KMPC daytime proposal does not increase radiation in the overlap areas beyond what presently exists for either station. Figure 2 is a detailed allocation mapping of KMPC, XE and XEBG. The radiation proposed is slightly less than what presently exists. Therefore, XE and XEBG are fully protected.

### CRITICAL HOURS ALLOCATION CONSIDERATIONS

KMPC currently protects co-channel Class A station KXEL Waterloo, Iowa during the critical hours. Since the proposed KMPC daytime antenna system does not increase radiation toward KXEL, it can be safely concluded that the proposed KMPC operation will continue to protect KXEL.

### NIGHTTIME ALLOCATION CONSIDERATIONS

The protected RSS nighttime limits of any legally qualifying North American station will not be increased by this proposal. The presently licensed facilities result in KMPC being a 50% RSS contributor to three domestic and one international station. The domestic stations are first adjacent channel Class A station KFBK Sacramento, California, first adjacent channel KYCY San Francisco, California and co-channel KREA Honolulu, Hawaii. Section 73.182(q) of the rules, footnote 1, requires that the KMPC nighttime proposal decrease its RSS contribution by 10% toward these stations.

The proposed KMPC nighttime directional antenna system design reduces the RSS toward KYCY by 10.3% and by 65.6% toward KFBK. An additional allocation consideration for KFBK is the presently licensed KMPC 10% 0.25 mv/m skywave contour totally overlaps the KFBK 0.5 mv/m contour. The proposed KMPC nighttime directional antenna design reduces the KFBK overlap. Figure 3 is a comparative mapping of the KFBK overlap area.

As to KREA, it should be noted that KMPC's presently licensed facilities are the sole contributor to the KREA 50% RSS. The amount of the contribution is 1.995 mv/m. Section 73.182(q) limits protection to 2 mv/m. Therefore, a 10% reduction is not required toward KREA. The proposed KMPC nighttime directional antenna system reduces the RSS to KREA by 1.5%.

The international station for which KMPC is presently a 50% RSS contributor is co-channel XEHOS Villa De Seris, Sonoma, Mexico. The US treaty with Mexico prohibits existing radiation to be increased when a station is a 50% RSS contributor. The FCC has not accepted this station and has filed an objection with Mexico. In order to expedite the processing of this application, the KMPC proposal does not increase radiation toward XEHOS beyond what presently exists. Actually, the radiation proposed is decreased by 4.4%. Accordingly, XEHOS is fully protected.

The presently licensed facilities also result in KMPC being a 25% contributor to co-channel station KXPA Bellevue, Washington. Section 73.182(q) of the rules, footnote 1, requires that the KMPC night proposal not increase radiation toward this station. The proposed KMPC nighttime reduces radiation toward KXPA by 1.5%.

KMPC must protect the 0.5 mv/m 50% skywave contour of Class A co-channel station KXEL Waterloo, Iowa. Figure 4 is a map that demonstrates the proposed KMPC nighttime 0.025 mv/m 10% skywave contour will not cause interference to KXEL.

## TECHNICAL DATA AND EXHIBITS

Figures 5 and 6 are polar plots of the proposed KMPC antenna patterns with tabulated horizontal plane radiation values. Table 1 is a tabulation of pertinent nighttime vertical plane radiation values.

A map of the city of license service contours for the existing and proposed KMPC daytime and nighttime operation is not provided since the proposed patterns maintain or increase radiation in all directions toward the city of license, Los Angeles, California. The KMPC nighttime interference free contour has been determined to be 7.96 mv/m.

## ANSI RADIATION GUIDELINES

A study of the proposed facility was conducted with respect to standards set forth in FCC Bulletin OST Number 65, Edition 97-01, regarding human exposure to radiofrequency radiation. The study evaluated the proposed KMPC 50 kilowatt antenna system as it provides a worst case analysis, and was based on data provided in Tables 2 and 3 of Supplement A, "Predicted Distances for Compliance with FCC Limits". Based on Tables 2 and 3, a distance of 4 meters from the tower would have to be observed to achieve ANSI radiofrequency compliance.

When it is necessary for workers to be within the hazard area near the towers, an appropriate power reduction or temporary cessation of broadcasting will be implemented. Access to the towers will be prevented by a fence with a locked gate. Signs, warning of a RF hazard, will be conspicuously posted at the site.

DECLARATION

The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Pittstown, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

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