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Runnels Broadcasting System, LLC
FCC Form 301

Runnels Broadcasting System, LLC, the licensee of KNFT-FM, Bayard, NM, proposes to install a Main Antenna, at an existing multiple-user transmitter site located at geographic coordinates 32° 51' 49' North Latitude, 108° 14' 27" West Longitude (NAD 27) using a circularly polarized antenna, 29 kW radiated power at 481 meters antenna radiation center height above average terrain. The proposed antenna radiation center is 38 meters above ground level (AGL).

An analysis was made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition 97-01, prepared by the FCC Office of Engineering and Technology. A 5 bay ERI "Rototiller" type-transmitting antenna was selected for the calculation of the KNFT-FM antenna power density as this will be the antenna of use.

At the base of the tower and two meters above ground level the predicted KNFT-FM antenna power density would be 45.0 uW/cm2, which is 22.5% of the FCC MPE limit for general population/uncontrolled exposure, and 4.5% of the FCC MPE limit for occupational/controlled exposure. Given that the antenna will be mounted 38 meters above ground level, additional analysis was conducted to look at all areas of the environment for the "worst case" power density level. As a result the highest predicted KNFT-FM antenna power density would be located 13 meters from the base of the supporting structure and is 113.0 uW/cm2, which is 57% of the FCC MPE limit for general population/uncontrolled exposure, and 11% of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of OET Bulletin 65, at multiple-user transmitter sites, those licensees whose transmitters produce power density levels in excess of 5.0% of the applicable exposure limit are considered "significant contributors" and share responsibility for actions necessary to bring the local RF environment in compliance with

FCC exposure limits. Since the KNFT-FM antenna is new to a multiple user site and will be considered a "significant contributor", other sources at the site were studied at all accessible locations. An RFR survey was conducted on April 14, 2003 by Rita Nickum using a Holaday HI-3012 RF Field Strength Meter, Serial #81301 and associated probes all calibrated 7/11/02. All contributors at the site were operating at their licensed power levels during the entire RFR survey and the readings were noted at two meters above ground level. The highest measured reading was observed four to six feet from the tower and was 2.3 uW/cm2 which is 1.1% of the FCC MPE limit for general population/uncontrolled exposure, and .23% of the FCC MPE limit for occupational/controlled exposure. Walking out in all directions from the tower and across all parking areas, roads, sidewalks and rooftops the readings remained at or below .26uW/cm2, which is .1% of the FCC MPE limit for general population/uncontrolled exposure, and .02% of the FCC MPE limit for occupational/controlled exposure. These other sources of RFR are less than 5% of the FCC MPEs for both the uncontrolled and the controlled environments and as a result are exempt from consideration.

In light of these measurements it is demonstrated that the addition of the proposed KNFT-FM to these other sources will not exceed the FCC MPEs for either general population/uncontrolled or the occupational/controlled exposure guidelines. If work is done on the tower in an area where over exposure could occur, Runnels will take necessary action to prevent the overexposure of workers on the tower including reducing the KNFT-FM transmitting power or ceasing operation completely. In addition, Runnels will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1) or (3) of the FCC Rules would be involved for the following reasons:

1. The KNFT-FM antenna facility will utilize an existing supporting structure that is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest.
2. With regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.

Patrick J. Parks
Consulting Engineer
7847 FM 2153
Aubrey, TX 76227

940-380-1317
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