ORIGINAL

ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

RECEIVED

APR - 8 1992

Federal Communications Commission
Office of the Secretary

In re Application of SKYLINE BROADCASTERS, INC. For Authority to Construct and Operate a New Commercial FM Broadcast Station to Serve the Community of Kalispell, Montana on Channel 292A	)))))))))	File No. BPH-910925MD

RECEIVED

APR 09 1992

FM EXAMINERS

To: The Chief, FM Branch

PETITION FOR LEAVE TO AMEND

Skyline Broadcasters, Inc. ("Skyline"), an applicant for Channel 292A at Kalispell, Montana, pursuant to Section 73.3522(a)(6) of the Rules, hereby seeks the Commission's leave to amend its instant application. As Skyline will show herein, good cause exists for the filing of this amendment.

1. The Federal Aviation Administration had advised Skyline that, to obtain clearance for Skyline's proposed antenna structure under Part 77 obstruction standards, Skyline should modify its proposal by slightly reducing its proposed structure height. Skyline agreed to do so, and on March 6, 1992, the FAA issued a Determination of No Hazard to Air Navigation with respect to Skyline's modified proposal.

2. Skyline's originally proposed HAAT exceeded 100 meters, the nominal Class A maximum. Skyline's consulting engineer had derated the ERP accordingly. Although reducing tower height causes a slight reduction in HAAT, Skyline can compensate with a slight ERP increase. Skyline can thus maintain equivalence to Class A maximum, and its proposed service area will not change. The accompanying amendment specifies the modified technical parameters acceptable to the FAA. This amendment thus perfects the grantability of Skyline's application.

3. Skyline has acted with due diligence in proferring this amendment. No voluntary act of Skyline has prompted this filing. The FCC has not yet been designated the Kalispell proceeding for hearing, so this amendment will not trigger any addition or modification of issues; nor will it disrupt any current hearing nor necessitate any additional hearing. This amendment will also not require any addition or modification of parties or cause unfair prejudice to any of the other Channel 292A Kalispell applicants. Skyline will not gain any competitive advantage from this amendment. In all respects, good cause exists for the acceptance of this amendment. See, Erwin O'Conner Broadcasting Co., 22 FCC 2d 140, 143 (Rev. Bd. 1970).

Accordingly, Skyline seeks the Commission's leave to amend its application to modify its technical proposal as described in the accompanying material.

Respectfully submitted,

SKYLINE BROADCASTERS, INC.

By J. J. McVeigh
John Joseph McVeigh

Its Counsel

Fisher, Wayland, Cooper and Leader
1255 Twenty-third Street Northwest,
Suite 800
Washington, D.C. 20037-1125
(202) 659-3494

Date: April 8, 1992

FCC Form 301
NEW(FM), Channel 292A,
Kalispell, Montana
File No. BPH-910525MD

CERTIFICATE OF AMENDMENT

Skyline Broadcasters, Inc., applicant for a construction permit for Channel 292A at Kalispell, Montana, hereby amends its pending FCC Form 301 application to include the attached materials. This amendment, which modifies Skyline Broadcasters' original technical proposal to conform to FAA requirements, should substitute for the corresponding portions of Skyline Broadcasters' application as originally filed.

SKYLINE BROADCASTERS, INC.

By _____
Ambrose G. Measure
Its President

Date: April 1-92

HATFIELD & DAWSON
CONSULTING ELECTRICAL ENGINEERS
4226 SIXTH AVE. N.W.
SEATTLE, WASHINGTON 98107

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE

PAUL W. LEONARD, PE
L.S. CHRISTIANE ENSLOW

TELEPHONE
(206) 783-9151
FACSIMILE
(206) 789-9834

MAURY L. HATFIELD, PE
CONSULTANT
BOX 1326
ALICE SPRINGS, NT 5950
AUSTRALIA

ENGINEERING REPORT:

MODIFICATION OF BPH-910925MD
APPLICATION FOR CONSTRUCTION PERMIT
CHANNEL 292 A, 106.3 MHZ
KALISPELL, MT

SKYLINE BROADCASTERS, INC.

3/92

TABLE OF CONTENTS

1. Purpose of Application

2. Allocation Considerations

   a. FM Channel Study

3. Facilities Proposed

   a. NIER Study

   b. Blanketing Contour

   c. Facilities and Coverage Contours

4. Exhibits Per FCC Form 301, Section V-B

a. Exhibit VB-5	Copy of F.A.A. Determination
b. Exhibit VB-8	Vertical Plan Sketch
c. Exhibit VB-15	Site Map
d. Exhibit VB-15-A	Photoreduction of Site Map
e. Exhibit VB-16	Proposed Coverage Contours
f. Exhibit VB-16-A	Proposed Contours on Census Map

5. FCC Form 301, Section V-B

6. Statement of Engineer

1. Purpose of Application

This Engineering Report is part of a modification of BPH-910925MD, an application for construction permit for a new FM broadcast station at Kalispell, Montana, by Skyline Broadcasters, Inc. Due to tower height restrictions imposed by the F.A.A., it is necessary to amend the pertinent exhibits in the application to reflect a reduction in overall tower height. The proposed station will operate on FM channel 292 A (106.3 MHz) with an effective radiated power of 2.05 kilowatts (3.12 dBk) at an antenna height above average terrain of 169 meters. The ERP specified is the maximum for Class A facilities at this antenna height, as calculated in accordance with the Commission's Rules.

2. Allocation Considerations

The attached computerized data summary shows that the proposed operation meets the co-channel and adjacent channel mileage spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules. Additionally, the attached computerized data summary shows that concurrence was obtained from the Canadian government to upgrade the Kalispell allotment to B1 in the appropriate bi-lateral table. MM Docket No. 88-375 (47) states, "Applications for a vacant Class Allotment which specify facilities in excess of 3 kW at 100 m within the Canadian border zone.....are not acceptable for filing unless the table of allotments in the applicable agreement has already been changed to a higher class. Further, applications for vacant allotments which do not conform to a bi-lateral table but which are accompanied by requests for negotiations to amend the bi-lateral table also are not acceptable for filing." This application is believed to fully comply with these requirements.

Hatfield & Dawson
Consulting Engineers
Seattle, Washington

FM SEPARATION STUDY

Job Title :PROP(FM) KALISPELL, MONTANA — Separation Buffer 100 km
FCC DB Date : 01/28/92
Channel 292A (106.3 MHz) — Coordinates : 48-09-58 114-19-51

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
CBYSFM	Sparwood		289A	0.80 DA	49-43-28	347.6	177.65	54
	BC		105.7	.0	114-51-48		123.65	CLEAR
	Creston		291B		49-09-56	303.7	205.51	149
	BC		106.1	.0	116-40-39		56.51	CLEAR
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.								
NEW	Kalispell		292A	1.95	48-09-58	.0	.00	115
APP	MT	BPH910925MD	106.3	174.0	114-19-51		-115.00	SHORT
ERP/HAAT Combination exceeds the maximum value for the international agreement								
NEW	Kalispell		292A	3.8	48-10-34	311.1	1.71	115
APP	MT	BPH910926MD	106.3	126.0	114-20-53		-113.29	SHORT
ERP exceeds the maximum allowed under international agreements								
NEW	Kalispell		292A	3.8	48-10-34	311.1	1.71	115
APP	MT	910926MB	106.3	126.0	114-20-53		-113.29	SHORT
Amended 920107								
ERP exceeds value for International agreements								
NEW	Kalispell		292A	3.9	48-10-34	311.1	1.71	115
APP	MT	BPH910926MI	106.3	123.0	114-20-53		-113.29	SHORT
ERP exceeds the maximum allowed under international agreements								
	Kalispell		292A		48-11-42	22.0	3.48	115
ALC	MT		106.3	.0	114-18-48		-111.52	SHORT
Proposed to Canada as B1 901005-Accepted by Canada 901030								
Effective 08-26-91								
K292CD	Whitefish, etc.		292D		48-30-11	359.0	37.48	0
LIC	MT	BLFT840925MH	106.3	.0	114-20-23		.00	TRANS
TRANSLATOR FOR KMBI, SPOKANE, WA.								
	Elkford		293A		50-00-00	351.6	206.24	113
	BC		106.5	.0	114-45-00		93.24	CLEAR
	Fort Macleod		295B		49-43-00	20.8	184.99	71
	AB		106.9	.0	113-25-00		113.99	CLEAR

** End of separation study for channel 292A **

3. Facilities Proposed

The proposed operation will be on channel 292 A (106.3 MHz) with an effective radiated power of 2.05 kilowatts. Operation is proposed with a 4 element circularly polarized omni-directional antenna, side-mounted on a uniform cross-section guyed tower to be constructed at a site located 3.7 kilometers southwest of central Kalispell. K18AJ, a television translator owned by KNAX(TV) currently operates from another tower at this site. When construction is complete, K18AJ will move to the proposed tower and the existing tower will be removed.

a. NIER Calculations

Study of the area within 1000 meters of the proposed site reveals no likely sources of non-ionizing radiation other than those mentioned above. Thus, the ground level NIER values near the base of the proposed structure are believed to be negligible. Precise calculations are made only with regard to the levels from this proposal and the translator.

The power density calculations shown below were made using the techniques outlined in the EPA report titled: *An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM, and TV Broadcast Services* (Gailey & Tell, April, 1985). All calculations contained herein are based on the measured element patterns for the antenna, and follow the procedure shown in the Gailey and Tell report. The patterns were identified by applying the procedure outlined in the report to the measurement data contained in the report titled: *Element Pattern Measurements on FM Antennas* (EPA-520/ 6-85-107, June 1985).

"Ground level" calculations in this report have been made at a reference height of 2 meters above ground to provide a worst-case estimate of exposure for persons standing on the ground in the vicinity of the tower. Equation #1, contained in the Gailey & Tell report and shown below, was used to calculate the ground level power density figures from each antenna at incremental distances from the base of its supporting tower.

$$S(\mu W/cm^2) = \frac{(\text{Adjusted ERP in Watts}) \times 1.64 \times 2.56 \times 100}{4 \times \pi \times (\text{Distance})^2}$$

Where: Adjusted ERP in Watts is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

Distance = Distance in meters from the center of radiation to the calculation point.

Calculations of the power density produced by the proposed antenna system assume a Type 3 element pattern, which is the element pattern for the ERI antenna which the applicant proposes to use. Ground level power densities have been calculated for locations extending from the base of the tower to a distance of 1000 meters. Values past this point are increasingly negligible.

The highest calculated ground level power density occurs at a distance of 32 meters from the base of the antenna support structure. At this point the power density is calculated to be 2.3 $\mu W/cm^2$, 0.23% of the ANSI standard.

"Worst-case" calculations of the power density produced by the translator operation proposed in their application for construction permit, BPTTL-910503XK, assume a Type

2 element pattern, which is the element pattern for the UHF antenna which is used by K18AJ. The highest calculated ground level power density occurs at a distance of 13 meters from the base of the antenna support structure. At this point the power density is calculated to be 12.4 $\mu W/cm^2$, 0.75% of the ANSI standard at the appropriate frequency.

These calculations show that the maximum calculated power density produced at two meters above ground level by the proposed operation and the "worst-case" operation of the translator is less than 1% of the ANSI standard.

The site is located in a rural area and public access is restricted by a gate. The antenna tower will be fenced and posted with warning signs and all station personnel and contractors will be required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.

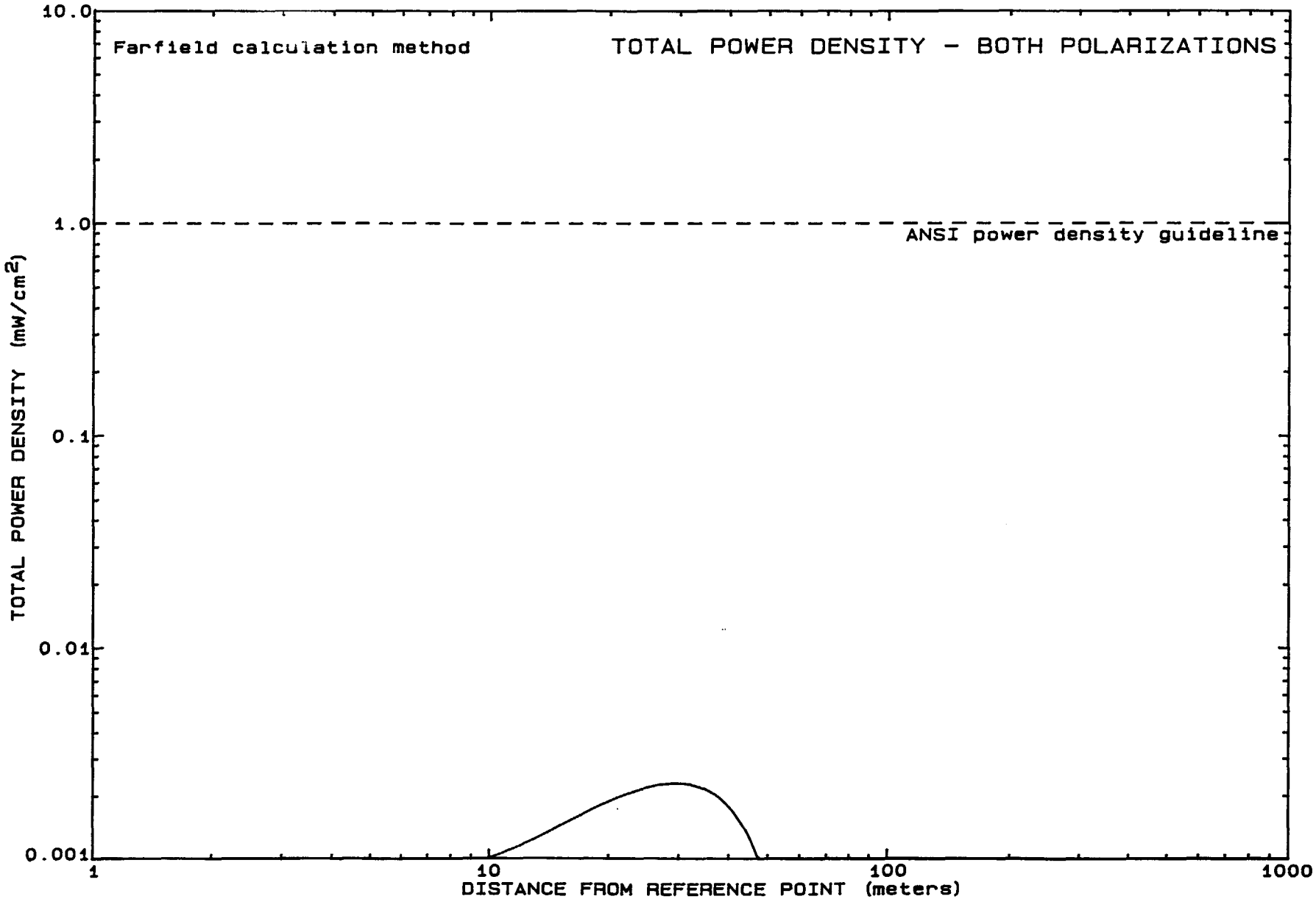
b. Blanketing Contour

The 115 dbu contour for the proposed facilities extends 564 meters from the tower, based on the calculation methodology shown in §73.318 of the Commission's Rules. Much of the area within the blanketing contour is unpopulated. The height of the proposed antenna above ground and its vertical radiation characteristics should mitigate any adverse effects to nearby residents or other communications facilities. If such adverse effects occur, the applicant will be responsible for their amelioration as prescribed in

§73.318, including receiver-induced intermodulation to facilities in existence or authorized or receivers in use prior to grant of this application as noted in Form 301, Section VB, Paragraph 14.

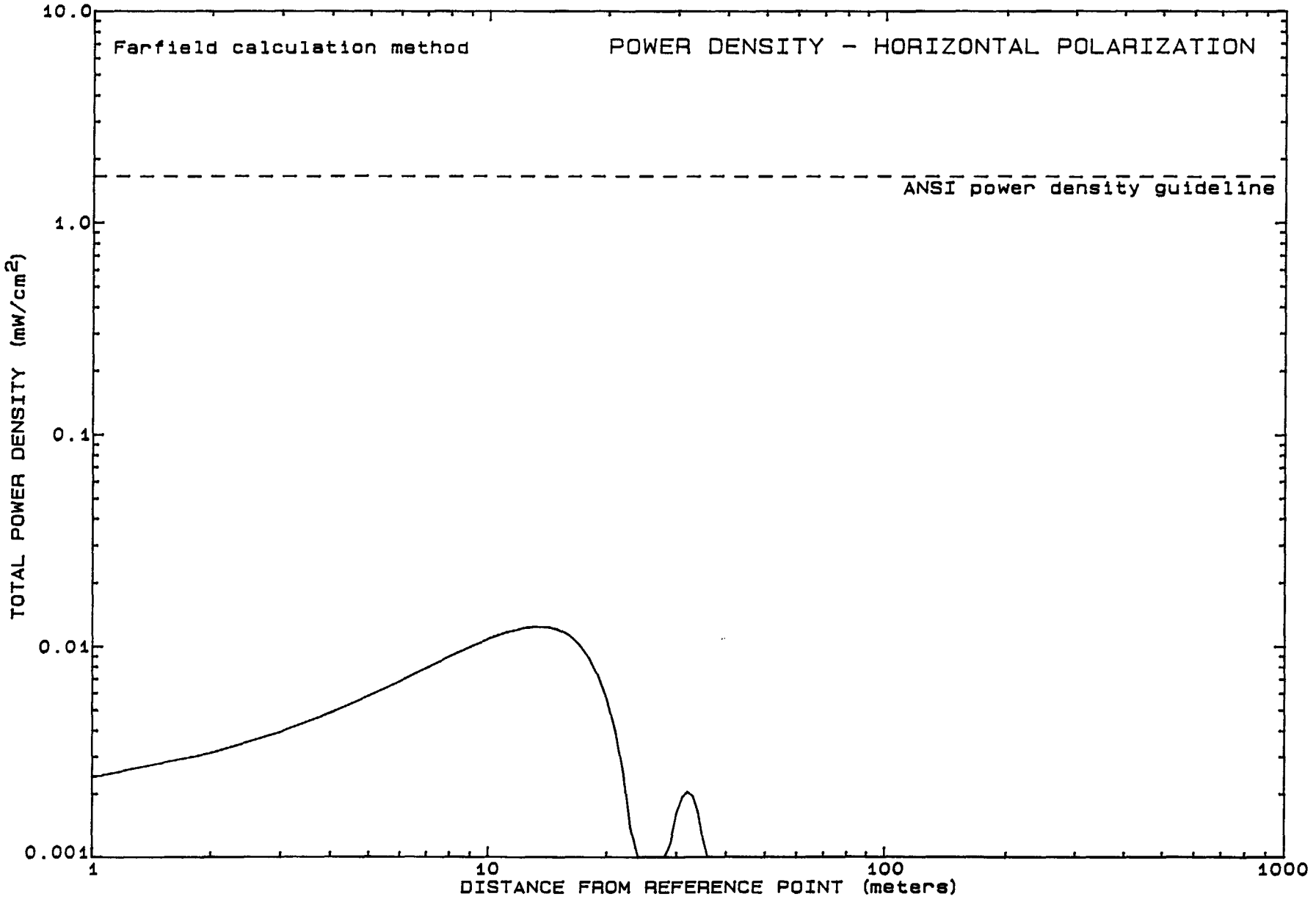
Station: PROP Frequency: 106.300 MHz Height of Observer (ARP): 2.0 Meters

	No. of Elements	Element Type	Height of Center (ARP)	Power (ERPd)
Horizontal Polarization:	4	EPA REPORT	74.0 m	2.051 kW
Vertical Polarization:	4	EPA REPORT	74.0 m	2.051 kW



Station: K18AJ Frequency: 495.250 MHz Height of Observer (ARP): 2.0 Meters

	No. of Elements	Element Type	Height of Center (ARP)	Power (ERPd)
Horizontal Polarization:	12	UHF ELEMENT	61.0 m	45.800 kW



FACILITIES & COVERAGE CONTOURS

PROPOSED FM RADIO STATION

KALISPELL, MONTANA

Channel 292 106.3 MHz

Class A, Omnidirectional Antenna

HAAT = 169 Meters

TERRAIN AVG. = 1033 Meters AMSL

RAD. CENTER = 1202 Meters AMSL

AZIMUTH (°True)	HAT (m)	HAAT (m)	ERP (kW)	ERP (dBk)	DISTANCE TO CONTOURS F(50,50) 70 dBu (km)	60 dBu (km)
0	927	276	2.05	3.12	20.5	35.4
45	910	293	2.05	3.12	21.1	36.3
90	886	316	2.05	3.12	22.0	37.6
135	894	308	2.05	3.12	21.7	37.1
180†	1325	-123	2.05	3.12	6.8	12.2
225	1169	33	2.05	3.12	7.1	12.6
270	1131	71	2.05	3.12	10.5	18.7
315	1024	178	2.05	3.12	16.6	28.9
* 23	908	294	2.05	3.12	21.2	36.4

† - Contour computed using 30 m per §73.313(e).
* - Extra radial, not included in average.

HATFIELD & DAWSON
CONSULTING ENGINEERS

US Department of Transportation
Federal Aviation Administration

Federal Aviation Administration
Northwest Mountain Region
System Management Branch, ANM-530
1601 Lind Avenue, S.W.
Renton, WA 98055-4056

EXHIBIT VB-5
COPY OF FAA DETERMINATION

IN REPLY REFER TO
AERONAUTICAL STUDY NO.
91-ANM-0781-OE

DETERMINATION OF NO HAZARD TO AIR NAVIGATION

SPONSOR	Paul Doolittle c/o KGEZ P.O. Box 169 Kalispell, MT 59903	CONSTRUCTION LOCATION PLACE NAME Kalispell, MT	
		LATITUDE 48-09-58	LONGITUDE 114-19-51
CONSTRUCTION PROPOSED	DESCRIPTION FM Antenna Freq. CH 292A Power 1.94 Kw ERP	HEIGHT (IN FEET) ABOVE GROUND 260	ABOVE MSL 3970

An aeronautical study of the proposed construction described above has been completed under the provisions of Part 77 of the Federal Aviation Regulations. Based on the study it is found that the construction would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the construction would not be a hazard to air navigation provided the following conditions are met:

Conditions:

See reverse.

Supplemental notice of construction is required any time the project is abandoned (use the enclosed FAA form), or

☐ At least 48 hours before the start of construction (use the enclosed FAA form)
☒ Within five days after the construction reaches its greatest height (use the enclosed FAA form)

This determination expires on OCT 15 1992 unless:

(a) extended, revised or terminated by the issuing office;
(b) the construction is subject to the licensing authority of the Federal Communications Commission and an application for a construction permit is made to the FCC on or before the above expiration date. In such case the determination expires on the date prescribed by the FCC for completion of construction, or on the date the FCC denies the application.

NOTE: Request for extension of the effective period of this determination must be postmarked or delivered to the issuing office at least 15 days prior to the expiration date.

This determination is subject to review if an interested party files a petition on or before APR - 5 1992. In the event a petition for review is filed, it should be submitted in triplicate to the Manager, Flight Information and Obstructions Branch, AAT-210, Federal Aviation Administration, Washington, D.C. 20591, and contain a full statement of the basis upon which it is made.

This detemination becomes final on APR 15 1992 unless a petition for review is timely filed, in which case the determination will not become final pending disposition of the petition. Interested parties will be notified of the grant of any review.

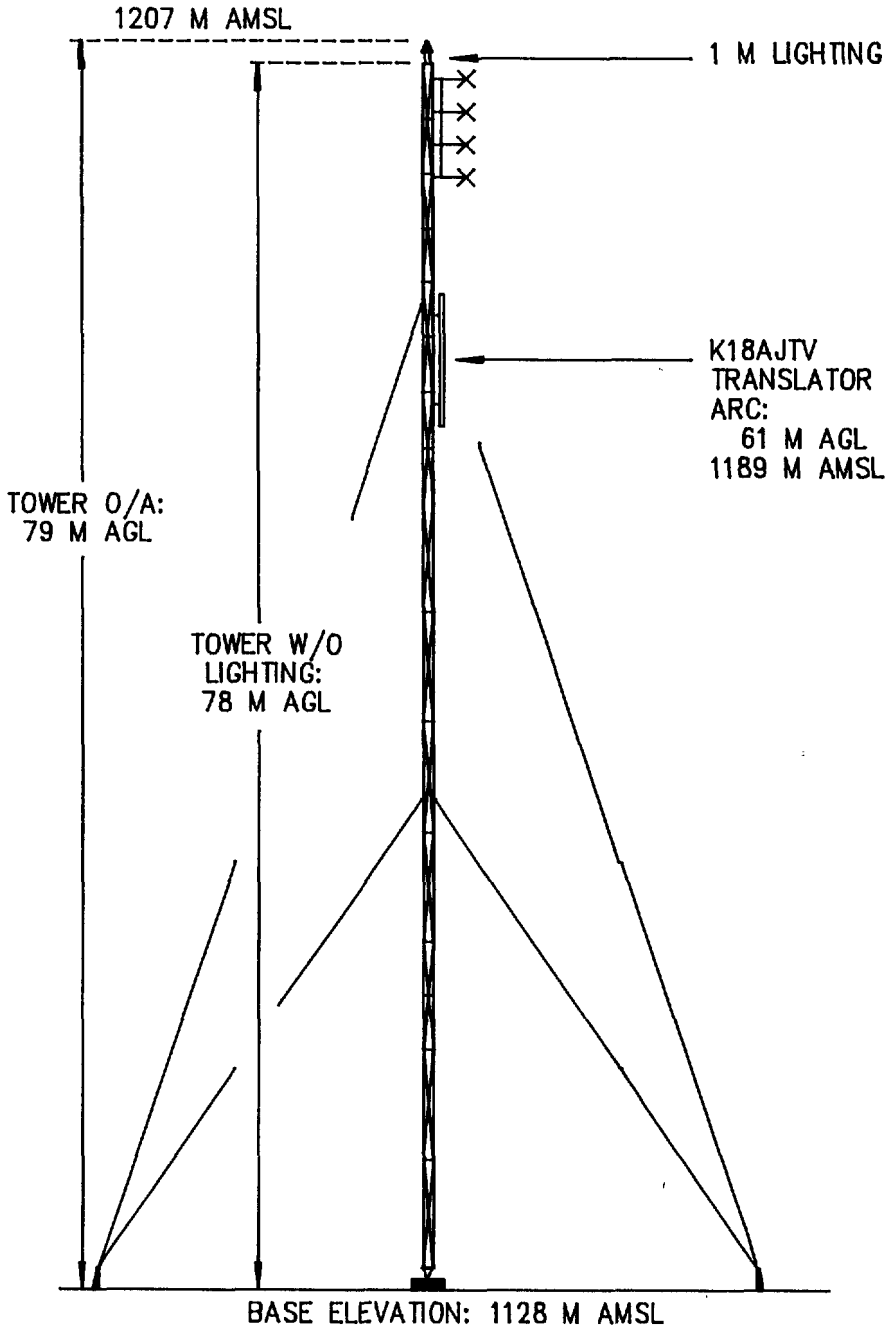
An account of the study findings, aeronautical objections, if any, registered with the FAA during the study, and the basis for the FAA's decision in this matter will be found on the following page(s).

If the structure is subject to the licensing authority of the FCC, a copy of this determination will be sent to that Agency.

This determination, issued in accordance with FAA Part 77, concerns the effect of this proposal on the safe and efficient use of the navigable airspace by aircraft and does not relieve the sponsor of any compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

SIGNED Richard E. Prang TITLE Manager, System Management Branch

ISSUED IN Seattle, Washington ON MAR - 6 1992

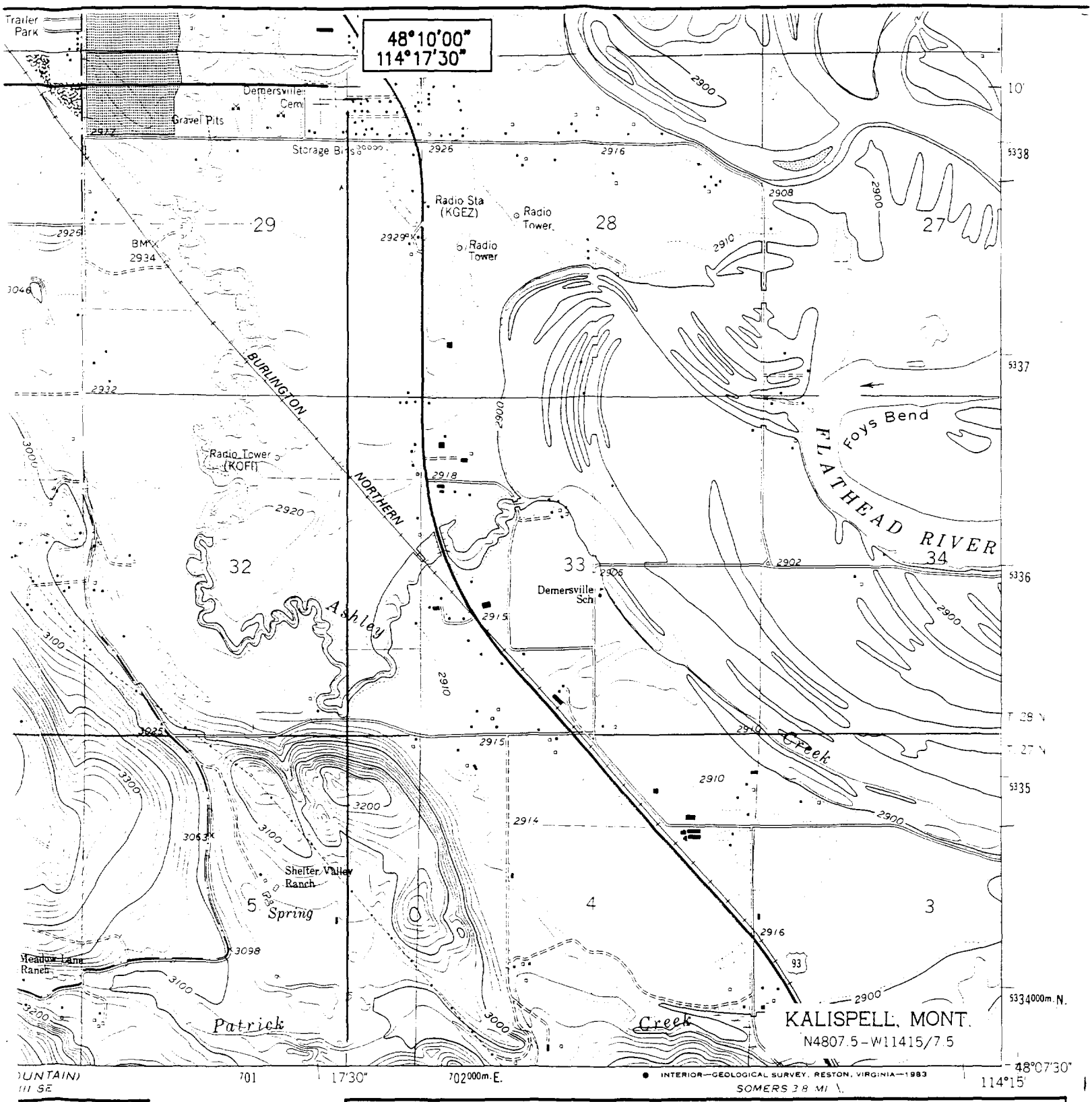


HATFIELD & DAWSON
CONSULTING ENGINEERS

EXHIBIT VB-8

VERTICAL PLAN SKETCH

PROPOSED FM KALISPELL, MT 3/92

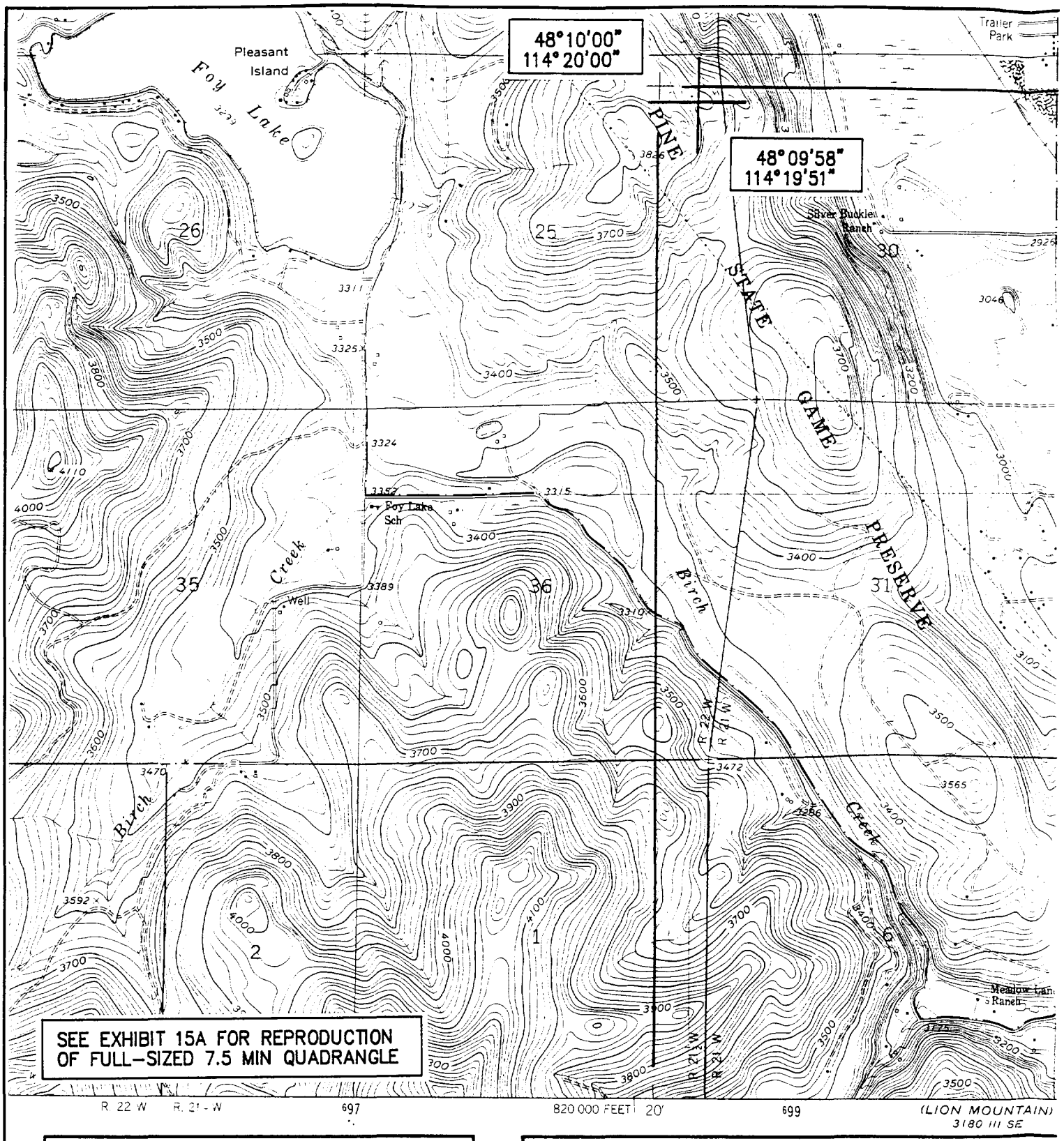


SCALE 1:24,000

0 KILOMETERS 1 2 3

0 MILES 1 2

3/92



SEE EXHIBIT 15A FOR REPRODUCTION OF FULL-SIZED 7.5 MIN QUADRANGLE

HATFIELD & DAWSON
CONSULTING ENGINEERS

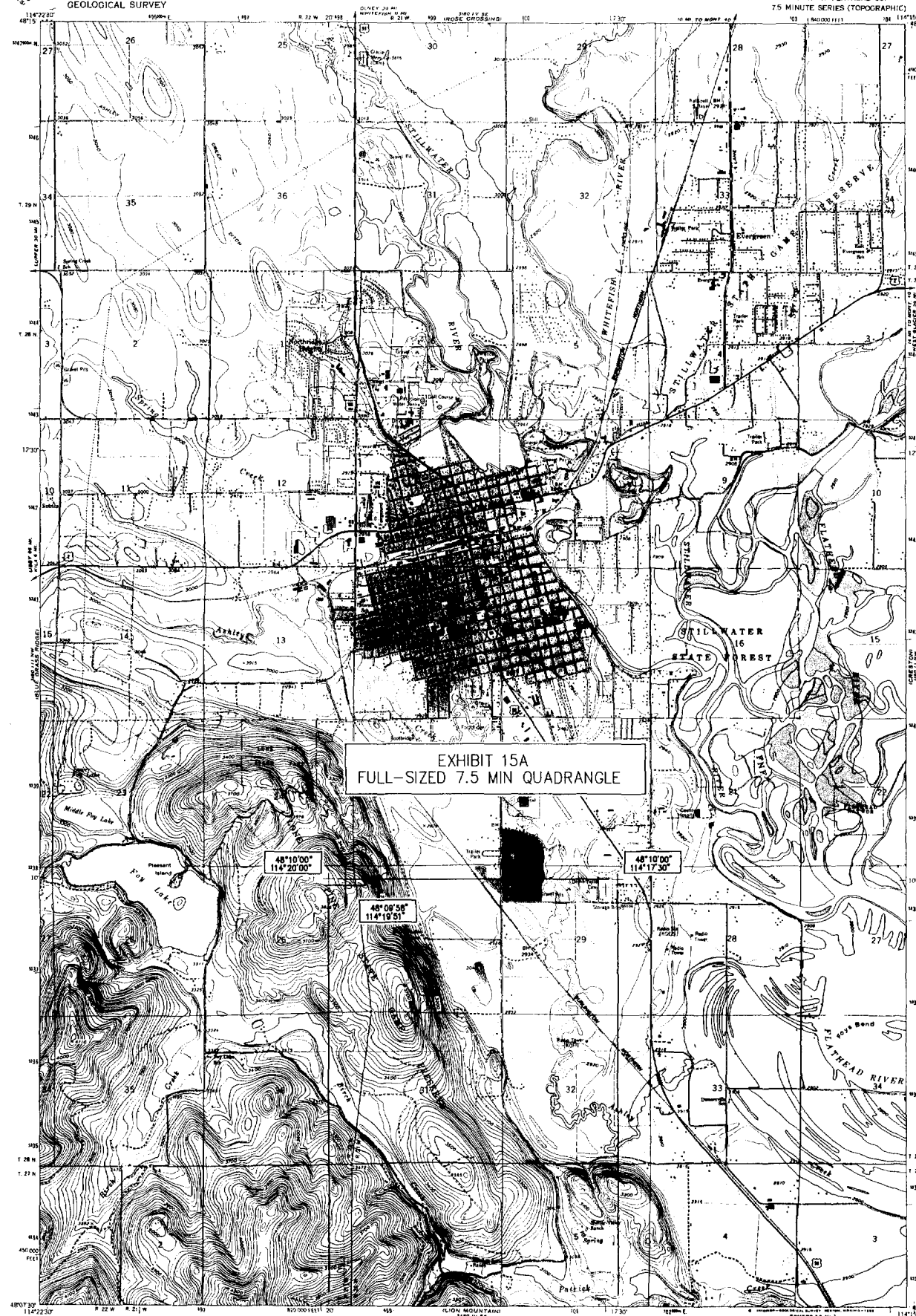
EXHIBIT VB-15

TRANSMITTER SITE MAP

PROPOSED FM KALISPELL, MT 3/92

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

KALISPELL QUADRANGLE
MONTANA-FLATHEAD CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1956. Field checked 1962

Polyconic projection. 1927 North American datum
10,000 foot grid based on Montana coordinate system, north zone
1000 meter Universal Transverse Mercator grid ticks, zone 11, shown in blue

Red tint indicates areas in which only landmark buildings are shown

Fine red dashed lines indicate selected fence lines

There may be private inholdings within the boundaries of the National or State reservations shown on this map

UTM GRID AND 1982 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET
DOTTED LINES REPRESENT 10-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple and woodland compiled from aerial photographs taken 1978 and other source data. This information not field checked. Map edited 1982

QUADRANGLE LOCATION

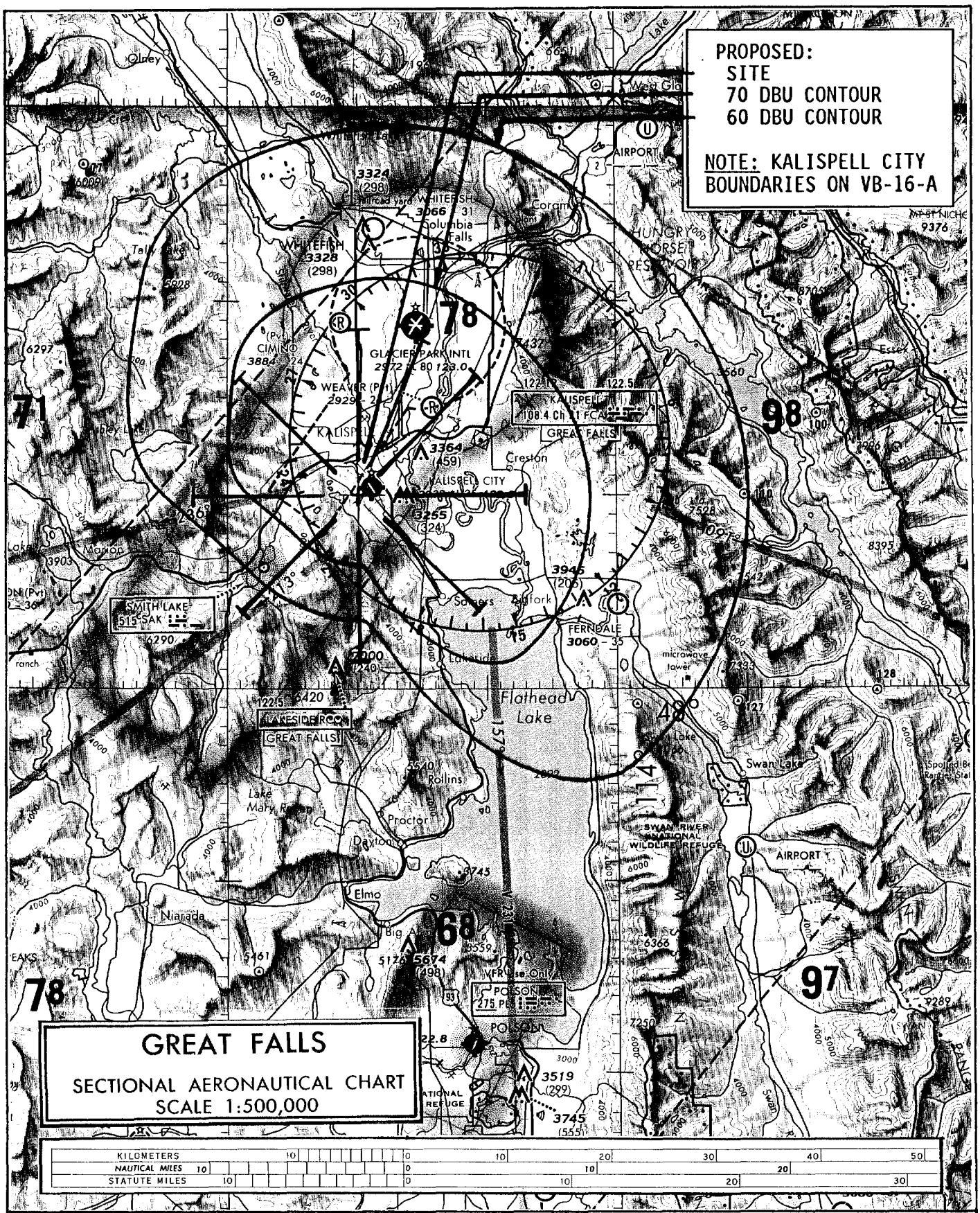
To place on the predicted North American Datum 1983 move the projection lines 12 meters north and 71 meters east as shown by dashed corner ticks

ROAD CLASSIFICATION

Medium duty — Light duty
Unimproved dirt
U.S. Route — State Route
Primary highway, hard surface

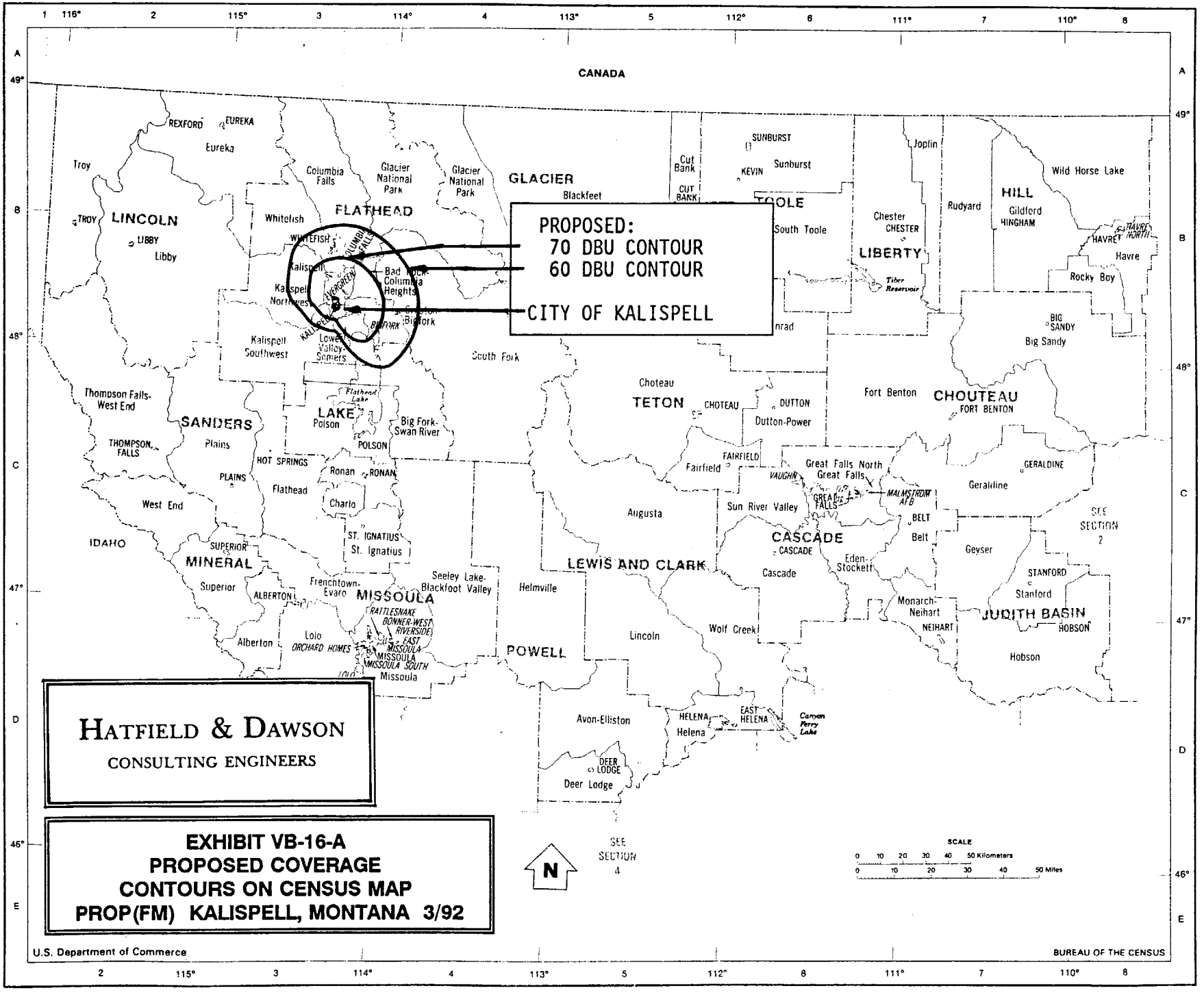
KALISPELL, MONT.
N4807.5—W11415/7.5

1962
PHOTOREVISED 1982
DMA 3180 III NE—SERIES V884



HATFIELD & DAWSON
CONSULTING ENGINEERS

EXHIBIT VB-16
PROPOSED COVERAGE CONTOURS
PROP(FM) KALISPELL, MONTANA 9/91


CANADA
PROPOSED:
70 DBU CONTOUR
60 DBU CONTOUR
CITY OF KALISPELL
GLACIER
FLATHEAD
LINCOLN
SANDERS
LAKE
MINERAL
MISSOULA
TETON
CHOUTEAU
LIBERTY
HILL
TOOLE
CASCADE
LEWIS AND CLARK
POWELL
JUDITH BASIN
HATFIELD & DAWSON
CONSULTING ENGINEERS
EXHIBIT VB-16-A
PROPOSED COVERAGE
CONTOURS ON CENSUS MAP
PROP(FM) KALISPELL, MONTANA 3/92
SCALE
0 10 20 30 40 50 Kilometers
0 10 20 30 40 50 Miles
N
U.S. Department of Commerce
BUREAU OF THE CENSUS

Section V-B - FM BROADCAST ENGINEERING DATA	For Commission Use Only File No. _____ ASB Referral Date _____ Referred by _____

Name of Applicant
SKYLINE BROADCASTERS, INC.

Call Letters (if issued) NEW	Is this application being filed in response to a window? ___ Yes _X_ No If Yes, specify closing date:

Purpose of Application (Check appropriate boxes)

*_X_ Construct a new (main) facility

___ Construct a new auxiliary facility

___ Modify existing construction permit for main facility

___ Modify existing construction permit for auxiliary facility

___ Modify licensed main facility

___ Modify licensed auxiliary facility

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

_X_ Antenna supporting-structure height

_X_ Effective radiated power

_X_ Antenna height above average terrain

___ Frequency

___ Antenna location

___ Class

___ Main studio location

_*_ Other (summarize briefly)

File Number(s) BPH-910925MD

* THIS IS A MINOR AMENDMENT TO THE NAMED APPLICATION FOR CONSTRUCTION PERMIT.

1. Allocation:

Channel No.	Principal community to be served:		
	City	County	State
292	KALISPELL	FLATHEAD	MT

Class (Check only one below)

_X_ A ___ B1 ___ B ___ C3

___ C2 ___ C1 ___ C

2. Exact location of antenna.

(a) Specify address, city, county, and state, If no address, specify distance and bearing relative to the nearest town or landmark.

3.7 KILOMETERS SOUTHWEST OF CENTRAL KALISPELL AT 203° TRUE.

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	48°	09′	58″	Longitude	114°	19′	51″

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ___ Yes _X_ No

If Yes, give call letter(s) or file number(s) or both DNA

If proposal involves a change in height of existing structure, specify existing height above ground level, including antenna, all other appurtenances, and lighting, if any.

DNA

4. Does the application propose to correct previous site coordinates? ___ Yes _X_ No
If Yes, list old coordinates.

Latitude ° ′ ″	Longitude ° ′ ″

5. Has the FAA been notified of the proposed construction? _X_ Yes ___ No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. Exhibit No. VB-5

Date 9/6/91 Office where filed NORTHWEST MOUNTAIN REGIONAL OFFICE

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to the nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	KALISPELL CITY AIRPORT	2.4	60°
(b)			

7. (a) Elevation: (to the nearest meter)

(1) of site above mean sea level; 1128 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 79 meters

(3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)] 1207 meters

(b) Height of radiation center: (to the nearest meter) H = Horizontal; V = Vertical

(1) above ground 61 meters (H)
61 meters (V)

(2) above mean sea level [(a)(1) + (b)(1)] 1189 meters (H)
1189 meters (V)

(3) above average terrain 169 meters (H)
169 meters (V)

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional-array element, specify heights and orientations of all array towers as well as location of FM radiator. Exhibit No. VB-8

9. Effective Radiated Power:
(a) ERP in the horizontal plane 2.05 kW (H*) 2.05 kW (V*)

(b) Is beam tilt proposed? ___ Yes _X_ No

If Yes, specify maximum ERP in the plane of the tilted beam, and attach as an Exhibit a vertical elevational plot of radiated field. Exhibit No. DNA

_____ kW (H*) _____ kW (V*)

* Polarization

10. Is a directional antenna proposed? ___ Yes _X_ No

If Yes, attach as an Exhibit a statement with all data specified in 47 C.F.R. Section 73.316 including plot(s) and tabulations of the relative field. Exhibit No. DNA

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.315(a) and (b)? _X_ Yes ___ No

If No, attach as an Exhibit a request for waiver and justification therefor, including amounts and percentages of population and area that will not receive 3.16 mV/m service. Exhibit No. DNA

12. Will the main studio be within the protected 3.16 mV/m field strength contour of this proposal? _X_ Yes ___ No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125. Exhibit No. DNA

13. (a) Does the proposed facility satisfy the requirements of 47 C.F.R. Section 73.207? _X_ Yes ___ No

(b) If the answer to (a) is No does 47 C.F.R. Section 73.213 apply? ___ Yes ___ No

(c) If the answer to (b) is Yes, attach as an Exhibit a justification, including a summary of any previous waivers. Exhibit No. DNA

(d) If the answer to (a) is No and the answer to (b) is No, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose. Exhibit No. DNA

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following: Exhibit No. DNA

(1) Protected and interfering contours, in all directions (360°), for the proposed operation

(2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications, and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as the transmitter location.

(3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.

(4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.

(5) The official title(s) of the map(s) used in the exhibit(s).

14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters, or any nonbroadcast (except citizens band or amateur) radio stations; or (b) within the blanketing contour, any established commercial or government receiving stations, cable head-end facilities, or populated areas; or (c) within ten (10) kilometers of the proposed antenna, any proposed or authorized FM or TV transmitters which may produce receiver-induced intermodulation interference? ___ Yes _X_ No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by receiver-induced or other types of modulation) to facilities in existence or authorized or to radio receivers in use prior to grant of this application. (See 47 C.F.R. Sections 73.315(b), 73.316(e) and 73.318.) Exhibit No. ENG. RPT.