

**ORIGINAL**

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C.  
**DOCKET FILE COPY ORIGINAL**

**RECEIVED**  
AUG 16 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments, )  
FM Broadcast Stations )  
(Johannesburg and Edwards, California )

MM Docket No. 99-239  
RM-9658

**COMMENTS**

High Desert Broadcasting Company ("High Desert"), the licensee of stations KUTY(AM), Palmdale, CA, KLKX(FM), Rosamond, CA, KHJJ(AM), Lancaster, CA and KGMX(FM), Lancaster, CA, hereby submits its comments in the above-referenced proceeding. As set forth below, the rulemaking proponent, Adelman Communications, Inc. ("Adelman" or "Petitioner"), has not demonstrated that the public interest will be served by the reallocation of channel 285 from Johannesburg to Edwards. Thus, as the public interest benefits have not been demonstrated, the proposed change in the Table of Allotments should be denied.

**Background**

Adelman is the licensee of KEDD(FM), Johannesburg, California. It requests, through this proceeding, to relocate KEDD to Edwards; thereby downgrading the facility from a Class B1 station to a Class A. According to the engineering statement filed with the Petition for Rulemaking, Adelman claims that the change in allocation will not create any new underserved area.

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As set forth in the engineering statement attached hereto, the principal assumption on which the Adelman proposal is based is flawed. There is in fact underserved area which will be created by the move of KRAJ to Edwards. Furthermore, Adelman's proposal would reduce service to the public by reducing the class of the station from B1 to A. Based on the loss of service which will result from a grant of this change in city of license, the proposed modification to the Table of Allotments should not be made.

### **Service Losses**

Adelman claims that, while certain populations will lose service because of the move, none of those persons are in an underserved area.<sup>1/</sup> As shown in the attached engineering statement (Exhibit A), this is incorrect. In fact, as the result of this move, 1,127 persons will receive less than 5 full time services. 1,125 of those persons currently are not underserved and will drop to underserved status as a result of Adelman's proposal. In addition, Adelman's proposal would result in a net reduction of service by approximately 14,000 persons. This is a huge loss of service for an area such as Johannesburg which has very few signals available to it and is unlikely to receive more due to the necessary protection of the heavy concentration of licensed stations elsewhere in California.

### **Flawed Claims of Service Gains**

Adelman claims that underserved areas which will be provided service by the move KRAJ to Edwards. However, this assumes that the hypothetical transmitter site by the Petitioner is in fact available. High Desert believes that the proposed site, and any other site in the vicinity proposed, will be unavailable due to the aeronautical hazard it would create. As shown in Exhibit

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<sup>1/</sup> Petitioner admits that there will be a slight area where service which will receive less than 5 full time signals, yet claims that the area contains no population.

B, a plotting on a local map of the location which High Desert believes to be the Adelman site, this site is immediately adjacent to the borders of Edwards Air Force Base. Edwards is an extremely active military airfield that is world renowned for the training of pilots and testing of highly experimental military aircraft. It is often used for landing the Space Shuttle. The construction of a broadcast tower immediately adjacent to this air base would create unacceptable risk of aeronautical collisions with the tower and interference to highly sensitive experimental avionics. Neither the FAA nor the Air Force would permit a broadcast tower anywhere near the location proposed by Adelman.

Because of these potential concerns, and the importance of the specific transmitter site specified in the Petition for Rulemaking to an areas and populations analysis of the Adelman proposal, the Petitioner should be required to demonstrate the availability and suitability of the site which it proposes. In similar circumstances, where the particular site specified in a rulemaking proceeding is important to a specific issue in that proceeding, the Commission has required the applicant to make such a showing. E.g., FM Table of Allotments (Woodstock & Broadway, Virginia), 3 FCC Rcd 6398, 65RR2d 713 (1988); FM Table of Allotments (Caldwell, Texas, et al), 13 FCC Rcd 13772, 13775 (1998) (where rulemaking proponent needed to make a special coverage showing to demonstrate city-grade coverage of his proposed city of license, a showing of proposed transmitter site availability and of FAA approval for the site were necessary). There is no reason to depart from that precedent here. In order to demonstrate that there will in fact be new underserved areas which will receive service from its relocated station, Adelman must be able to show that the specific site from which such purported service gains can be provided is available to it. Given the substantial defense and national security risks associated with the Adelman proposal, this showing becomes even more important.

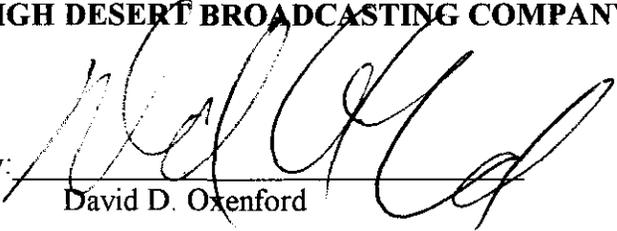
Without such a showing, there can be no determination that the proposal is in the public interest. High Desert has demonstrated that people will lose service from the relocation of the station. There is no proof that such losses will be made up by the gain of new services, as there are substantial questions of the availability of the site specified by the Petitioner. Therefore, the Petition must be rejected.

**Conclusion**

As there has been no showing that the proposal of Adelman benefits the public interest, it must be rejected. High Desert respectfully requests that the Commission take this action.

Respectfully submitted,

**HIGH DESERT BROADCASTING COMPANY**

By: 

David D. Oxenford

Its Attorney

FISHER WAYLAND COOPER LEADER  
& ZARAGOZA L.L.P.  
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Suite 400  
Washington, D.C. 20006  
(202) 659-3494

Dated: August 16, 1999

**EXHIBIT A**

**ENGINEERING EXHIBITS  
IN SUPPORT OF  
COMMENTS TO NOTICE OF  
PROPOSED RULE MAKING**

**August 13, 1999**

**High Desert Broadcasting Company, Commenter  
Adelman Communications, Inc., Petitioner  
MM Docket No. 99-239, RM-9658  
Johannesburg and Edwards, California**



**LAWRENCE L. MORTON ASSOCIATES  
2667 BELDEN DRIVE  
HOLLYWOOD HILLS, CALIFORNIA 90068-1801  
(323) 467-5010 / FAX (323) 467-5848**

## TABLE OF CONTENTS

### EXHIBIT DOCUMENT DESCRIPTION

- E-1      Engineering Statement and Affidavit**
- E-2      Map Showing Comparison of KEDD(FM) Service Contours Between Licensed Channel 280B1 Facility at Johannesburg and Proposed Channel 280A Allotment at Edwards AFB, California, and Proposed Gain and Loss Areas**
- E-3      Map Showing Comparison of Service Areas Between Licensed Channel 280B1 Facility of KEDD(FM) at Johannesburg, and Proposed Channel 280A Allotment at Edwards AFB, California and Contours of Other Fulltime Aural Broadcast Services**
- E-4      Maps Showing Portions of Proposed Loss Area That Receive Service From Other Fulltime Aural Broadcast Services**
- E-5      Tabulation of Other Fulltime Aural Broadcast Services Within Proposed Loss Area of KEDD(FM) at Johannesburg**
- E-6      Tabulation of AM and FM Broadcast Stations Providing Fulltime Aural Broadcast Services Within Proposed Loss Area of KEDD(FM) at Johannesburg**
- E-7      Maps Showing Portions of Proposed Loss Area That Receive Service From Other Fulltime Aural Broadcast Services**
- E-8      Tabulation of Other Fulltime Aural Broadcast Services Within Proposed Gain Area of KEDD(FM) at Edwards AFB**
- E-9      Tabulation of AM and FM Broadcast Stations Providing Fulltime Aural Broadcast Services Within Proposed Gain Area of KEDD(FM) at Edwards AFB**

## **EXHIBIT E-1 ENGINEERING STATEMENT**

The information and data contained within these engineering exhibits were prepared on behalf of High Desert Broadcasting Company ("High Desert"), in support of comments to *Notice of Proposed Rule Making*, MM Docket No. 99-239, RM-9658, released June 25, 1999.

### **I. DISCUSSION**

The proposed allotment of Channel 280A to Edwards and removal of the Channel 280B1 allotment at Johannesburg results in a considerable change to the area served by station KEDD(FM). The proposed gain and loss areas were studied to determine whether the proposed changes would result in equitable distribution of aural broadcast services.

The 1990 U.S. Census population within the KEDD(FM) licensed 60 dB $\mu$  service contour at Johannesburg encompasses 43,420 persons. The population within a full Class A facility of 100 meters HAAT and 6 kW ERP at the proposed allotment reference site at Edwards would encompass a population of 29,407 persons.

Exhibit E-2 shows in pink the portion of the area within the present KEDD(FM) service contour that will lose service if the petitioner's request is granted. This area encompasses a 1990 U.S. Census population of 37,424 persons. The map shows also in light green the gain area associated with the petitioner's proposal. The population within this area is 23,411 persons. The 1990 U.S. Census population within the area common to both contours is 5,996 persons. The proposed loss area encompasses 86 percent of the population and 91 percent of the land area within the licensed KEDD(FM) service contour.

### **II. SECTION 307(b) STUDY**

Exhibit E-3 is a map showing the KEDD(FM) licensed contour at Johannesburg and the contour from a full Class A facility at Edwards. In pink is the loss area and shown in light green is the gain area. The area shown in light yellow is common to both contours.

A study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the proposed loss area within the KEDD(FM) licensed 60 dB $\mu$  service contour at Johannesburg. The loss area is defined to be that region within the KEDD(FM) contour that will not be served by the proposed Class A facility at Edwards.

Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all

**EXHIBIT E-1  
August 1999**

Page 2

full-time AM facilities within the vicinity of the area under study to determine those AM stations that provide nighttime interference-free service within the KEDD(FM) proposed loss area.

Also studied were the 60 dB $\mu$  contours of all FM stations in the area to determine those that provide service to portions of the KEDD(FM) proposed loss area. For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater. Exhibit E-6 is a tabulation of the stations that provide full-time aural broadcast reception within the KEDD(FM) proposed loss area.

Exhibit E-3 is a "spaghetti" map depicting the KEDD(FM) licensed and proposed 60 dB $\mu$  service contours and the contours of all AM and FM stations that provide full-time aural broadcast service within the KEDD(FM) proposed gain and loss areas. Exhibits E-4A through E-4E are a series of maps showing the licensed service contour of KEDD(FM), and the service contours of the existing full-time aural services within the loss area portion of the KEDD(FM) contour. Blue shading is used to represent the areas that receive a specific number of full-time aural broadcast services corresponding to the number indicated in the title block of the map. Exhibit E-5 tabulates these data and indicates the land areas and populations within the identified regions.

There is a 1990 U.S. Census population of 1,127 persons within the proposed loss area of KEDD(FM) that will become under-served by adoption of the petition. An underserved area is a region that will be served by fewer than five full-time aural broadcast services as a result of the proposed move of KEDD(FM). Thus, the proposed move of KEDD(FM) from Johannesburg to Edwards would cause 1,125 persons who now are well served under the Commission's definition to become under-served, and would reduce service to two persons that are already under-served.

A further study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the proposed gain area within the KEDD(FM) proposed 60 dB $\mu$  service contour at Edwards. Presently, there are 4,601 persons that are under-served that would be provided with a new service by adoption of the petitioner's request. Of these under-served people, 1,549 persons would become well-served by the move of KEDD(FM) to Edwards. The proposed gain area does not contain any *gray* or *white* areas.

### III. METHODS

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from topographic data obtained from the computerized Defense Mapping Agency three arc-second point elevation database. Along each radial 261 points were linearly interpolated according to the requirements of § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

**EXHIBIT E-1  
August 1999**

**Page 3**

The locations of the 60 dB $\mu$  F(50,50) service contours were determined using computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. These computer methods use digitized data taken from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

Technical data for AM broadcast stations were obtained from the latest version of the FCC AM Engineering Database. Soil conductivities used in the determination of distances to the nighttime interference-free contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed. In accordance with § 73.183(e), the "equivalent-distance" (Kirke) method was used to determine the distances to the nighttime interference-free contours where more than one conductivity zone exists over the path length.

Population figures for the areas within the contours were obtained through use of the computerized *1990 Census of Population and Housing Public Law 94-171 Data* made available by the U.S. Department of Commerce, Bureau of the Census. The census counts were taken down to the block level for maximum accuracy and resolution. There are approximately seven million block level records in the database. When the centroid coordinates of a census block fell within the contour the entire population associated with the block was assumed to reside within the contour. When the centroid fell outside the contour no portion of the population was counted.

The areas within the contours were computed using numerical integration employing the computed distances to the contours for each degree of azimuth. Distances to contours along intermediate azimuths were obtained mathematically by piecewise third-order polynomial approximations.

In cases where stations had a licensed and authorized facility, the contours were based on the authorized facility.



**Lawrence L. Morton, P.E.  
Consulting Engineer to High Desert Broadcasting Company  
August 13, 1999**

### AFFIDAVIT

State of California                    )  
                                           )    ss:  
 County of Los Angeles            )

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

Date: August 13, 1999

**ORIGINAL COPY SIGNED**

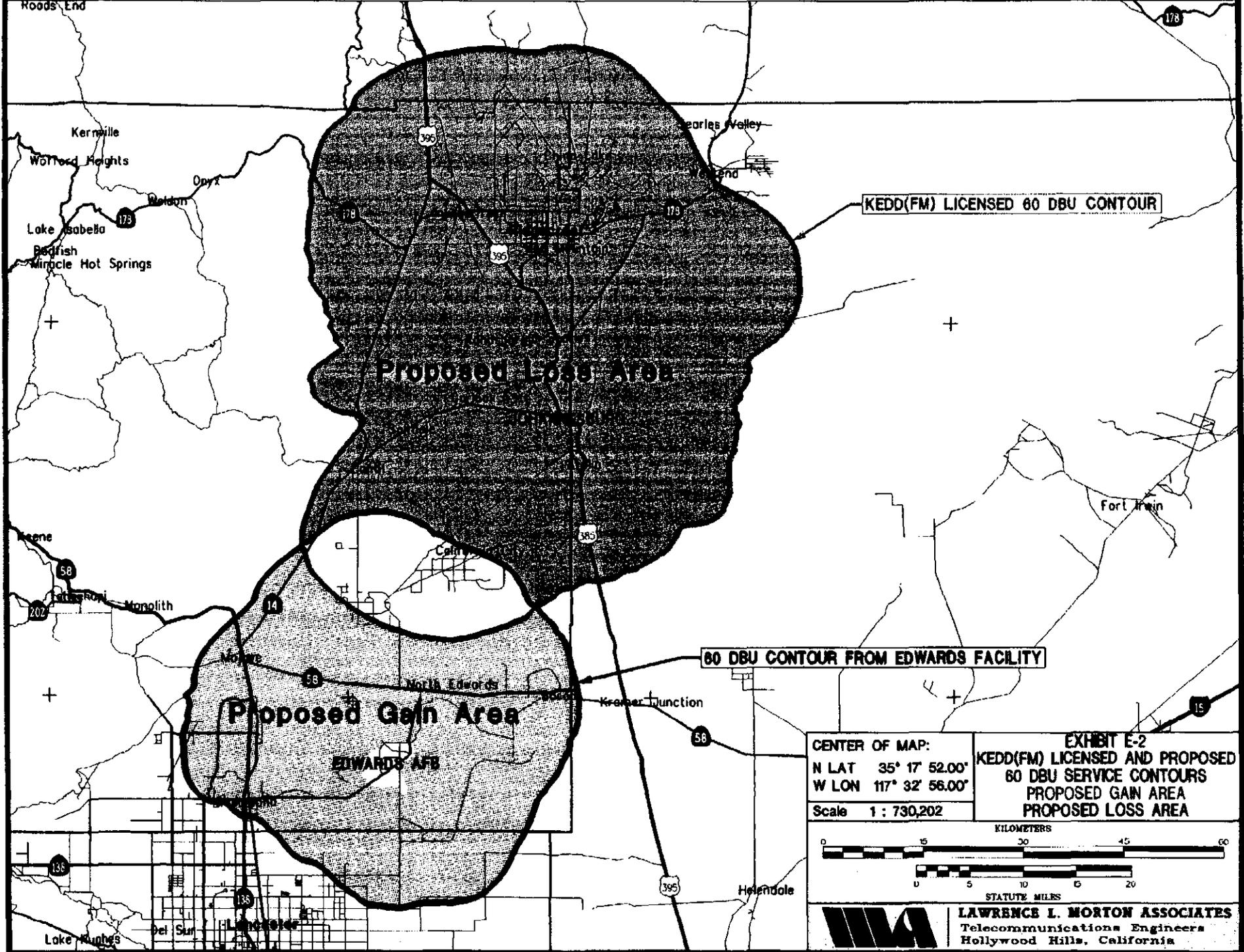
Lawrence L. Morton, P.E.

On August 13, 1999, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/99

**ORIGINAL COPY NOTARIZED**

Notary Public

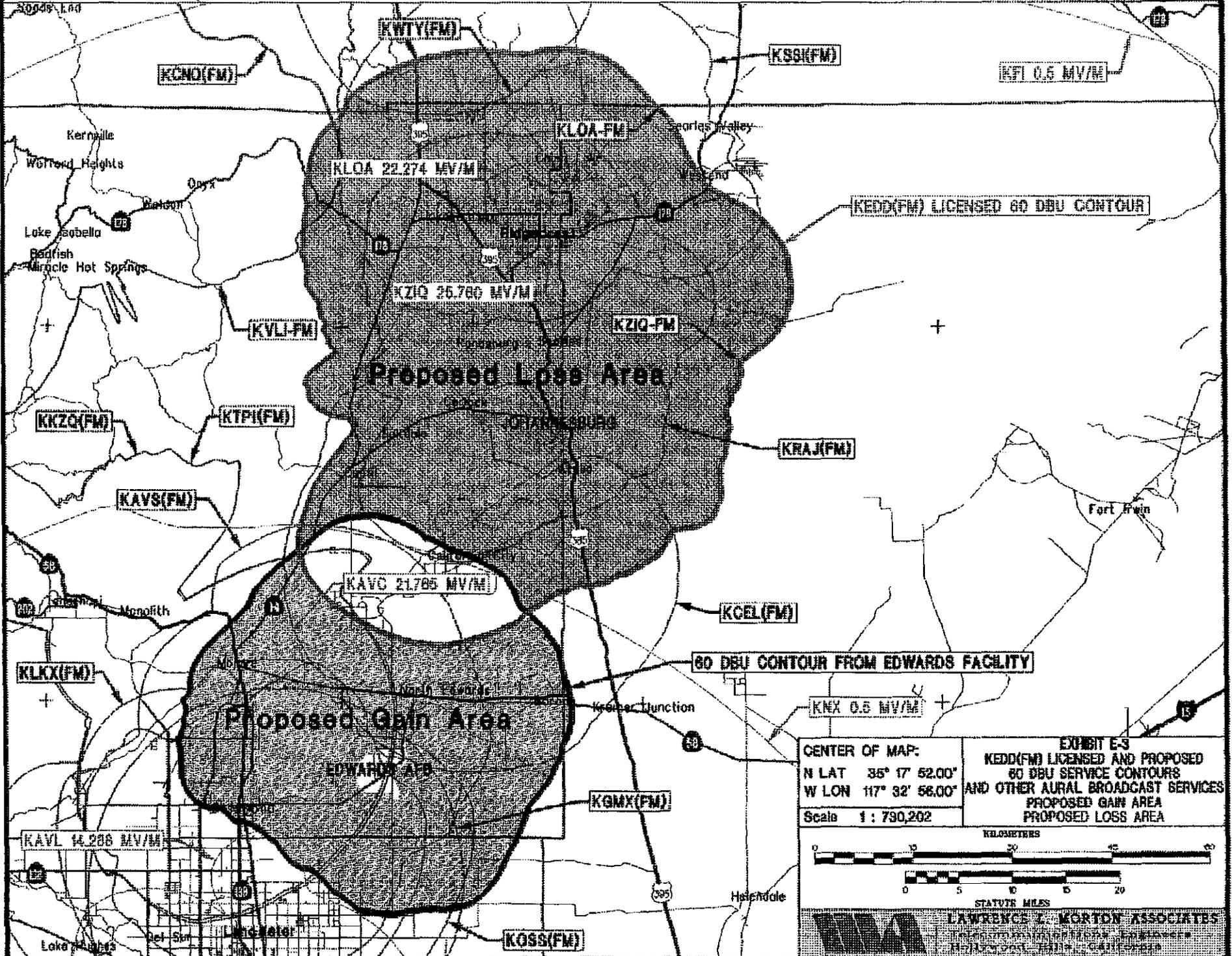


CENTER OF MAP:  
 N LAT 35° 17' 52.00"  
 W LON 117° 32' 56.00"  
 Scale 1 : 730,202

EXHIBIT E-2  
 KEDD(FM) LICENSED AND PROPOSED  
 60 DBU SERVICE CONTOURS  
 PROPOSED GAIN AREA  
 PROPOSED LOSS AREA

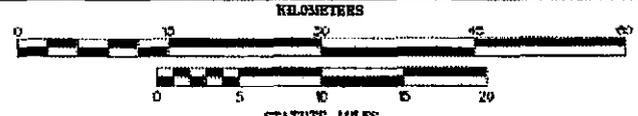


**LMA**  
**LAWRENCE L. MORTON ASSOCIATES**  
 Telecommunications Engineers  
 Hollywood Hills, California



**EXHIBIT E-3**  
**KEDD(FM) LICENSED AND PROPOSED**  
**60 DBU SERVICE CONTOURS**  
**AND OTHER AURAL BROADCAST SERVICES**  
**PROPOSED GAIN AREA**  
**PROPOSED LOSS AREA**

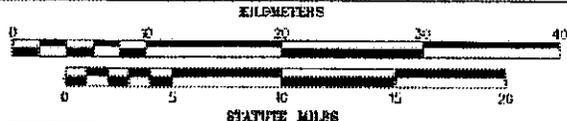
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 Scale 1 : 730,202



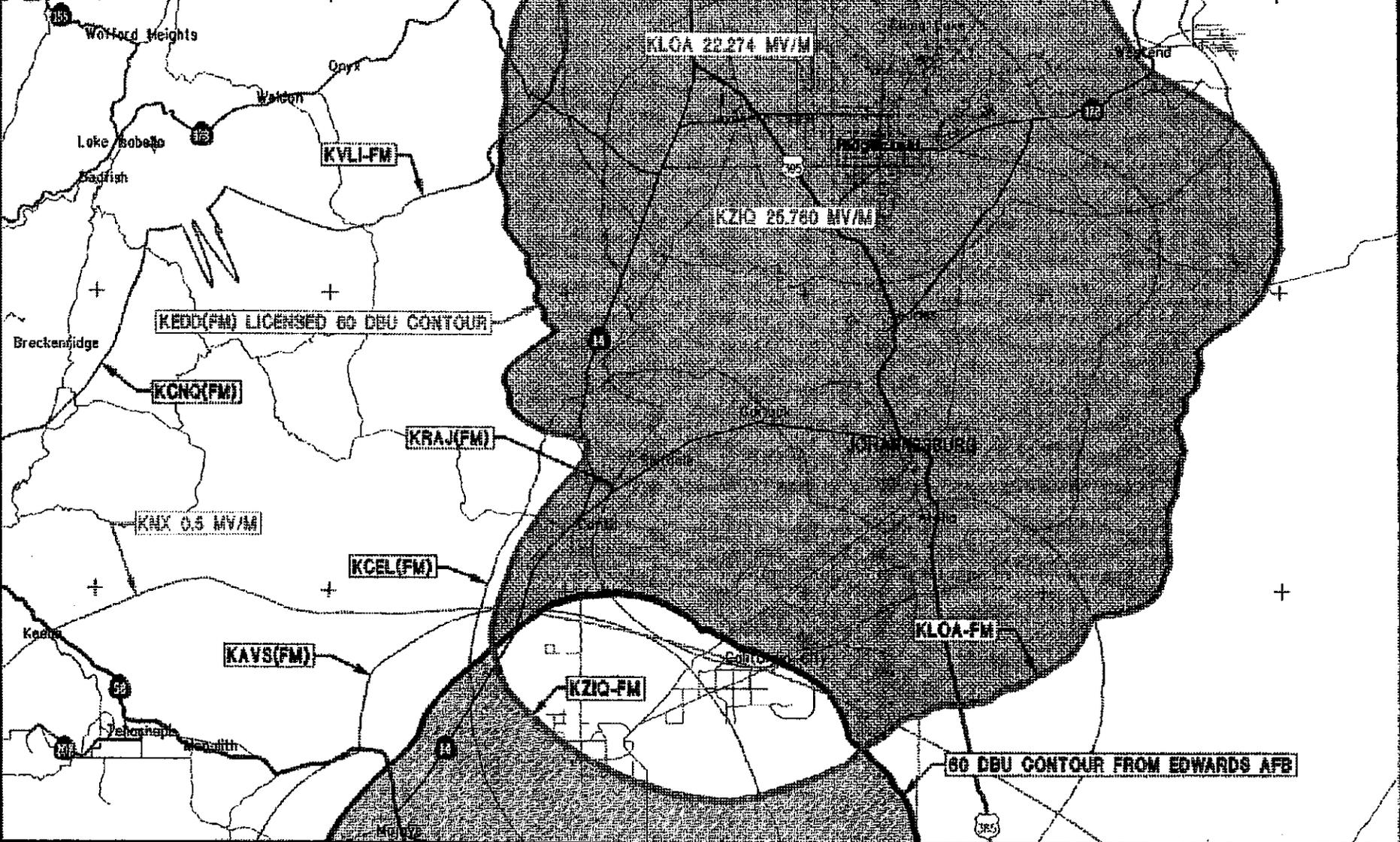
**LAWRENCE T. MORTON ASSOCIATES**  
 11750 East Main Street, Gardnerville, NV 89450  
 Telephone: (775) 784-1111

CENTER OF MAP:  
N LAT 35° 29' 59.00"  
W LON 117° 51' 51.00"  
Scale 1 : 527401

**EXHIBIT E-4A**  
**KEDD(FM) PROPOSED LOSS AREA**  
**AND OTHER AURAL BROADCAST SERVICES**  
**AREAS SERVED BY 1 STATION**



**LAWRENCE L. MORTON ASSOCIATES**  
10000 Wilshire Blvd., Suite 1000  
Beverly Hills, California 90210



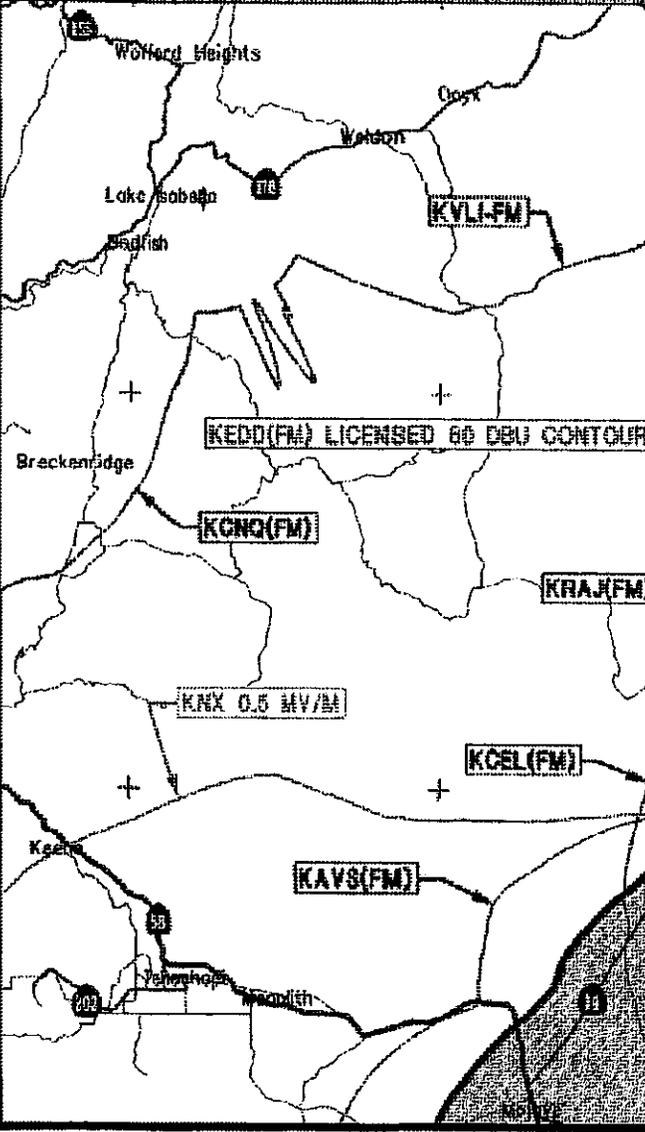
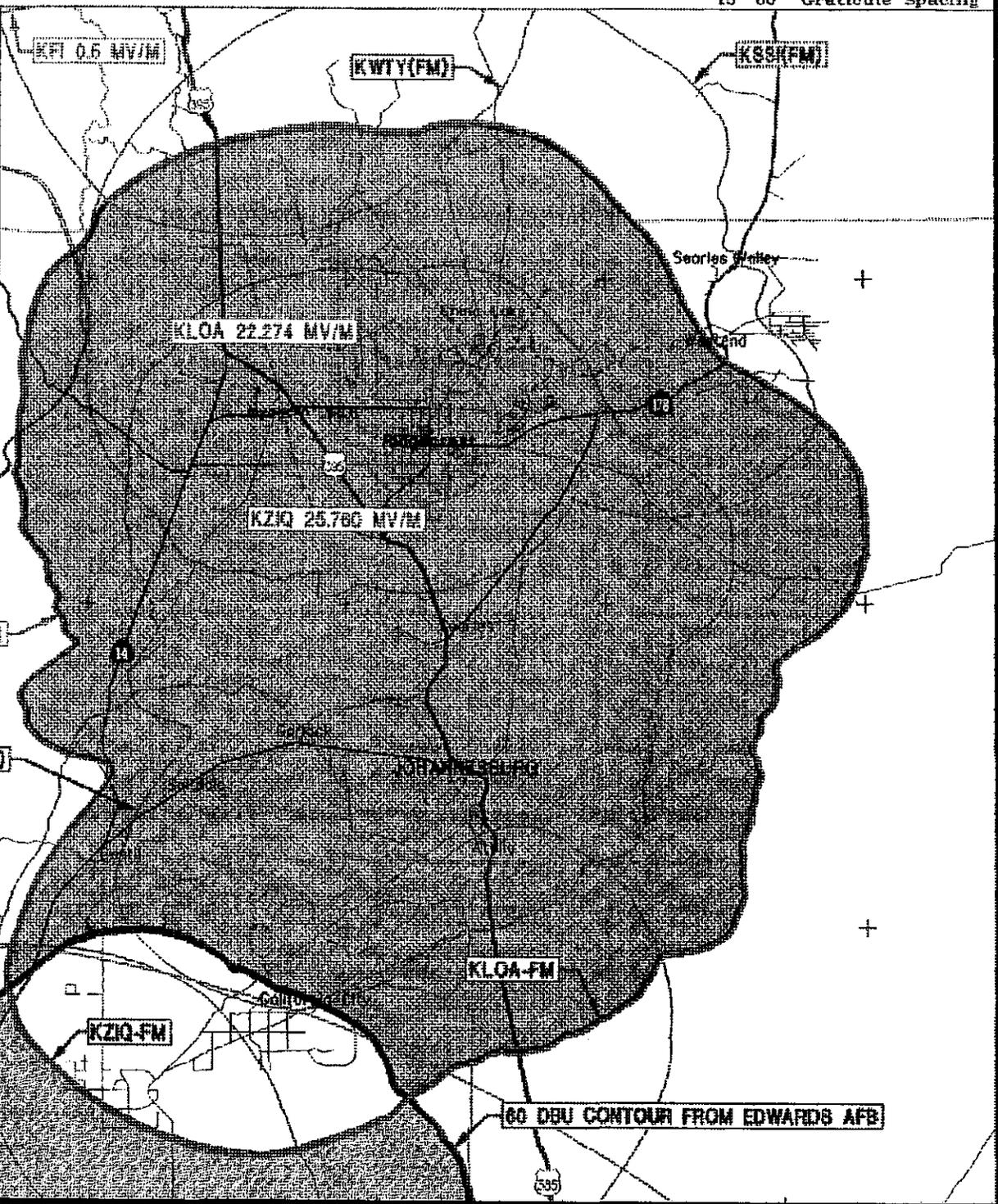
CENTER OF MAP:  
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W LON 117° 51' 51.00"

**EXHIBIT E-4B**  
**KEDD(FM) PROPOSED LOSS AREA**  
**AND OTHER AURAL BROADCAST SERVICES**  
**AREAS SERVED BY 2 STATIONS**

Scale 1 : 627,401



**LAWRENCE L. MORTON ASSOCIATES**  
Telecommunications Engineers  
Hollywood Hills, Glendale, California



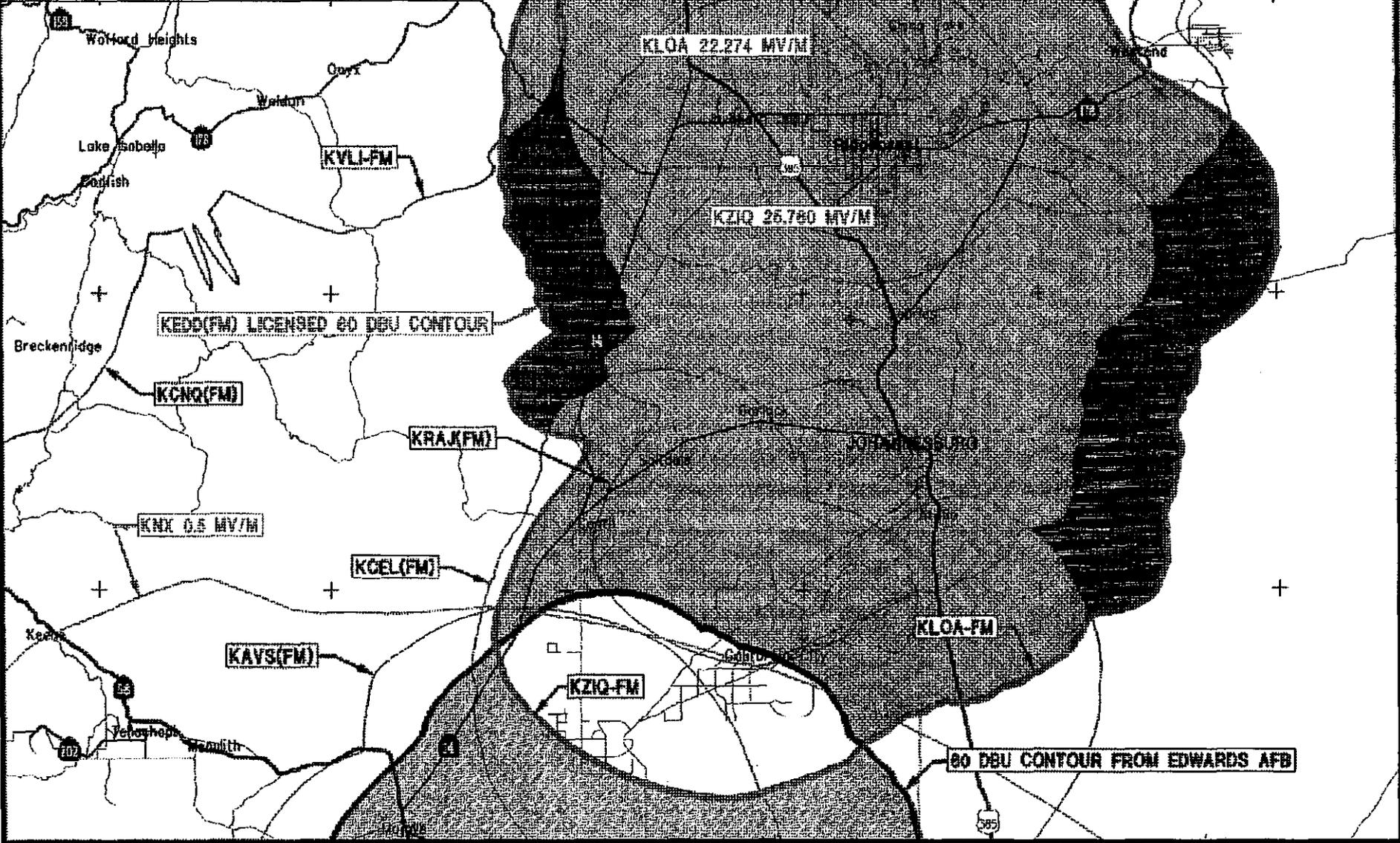
60 DBU CONTOUR FROM EDWARDS AFB

CENTER OF MAP:  
N LAT 35° 28' 59.00"  
W LON 117° 51' 51.00"  
Scale 1 : 627,401

**EXHIBIT E-4C**  
**KEDD(FM) PROPOSED LOSS AREA**  
**AND OTHER AURAL BROADCAST SERVICES**  
**AREAS SERVED BY 3 STATIONS**



**LAWRENCE D. MORTON ASSOCIATES**  
Telephone: 310-205-1100  
10010 Wilshire Blvd., Suite 200  
Beverly Hills, California 90210



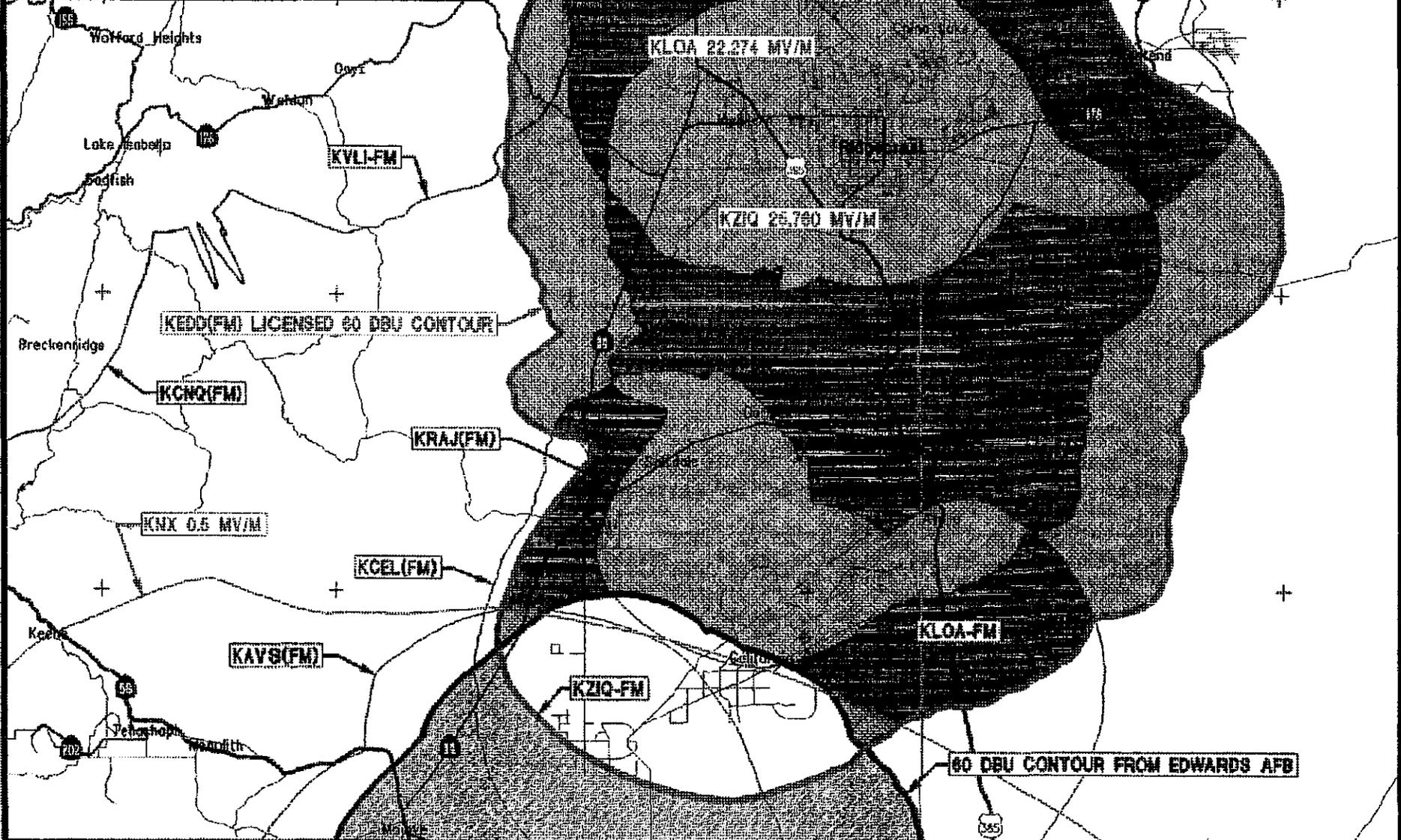
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W LON 117° 51' 51.00"

**EXHIBIT E-4D**  
**KEDD(FM) PROPOSED LOSS AREA**  
**AND OTHER AURAL BROADCAST SERVICES**  
**AREAS SERVED BY 4 STATIONS**

Scale 1 : 527,401



**LAWRENCE I. MORTON ASSOCIATES**  
TELECOMMUNICATIONS ENGINEERS  
WOLFSWOOD ROAD, CALIFORNIA



CENTER OF MAP:

N LAT 35° 29' 59.00"

W LON 117° 51' 51.00"

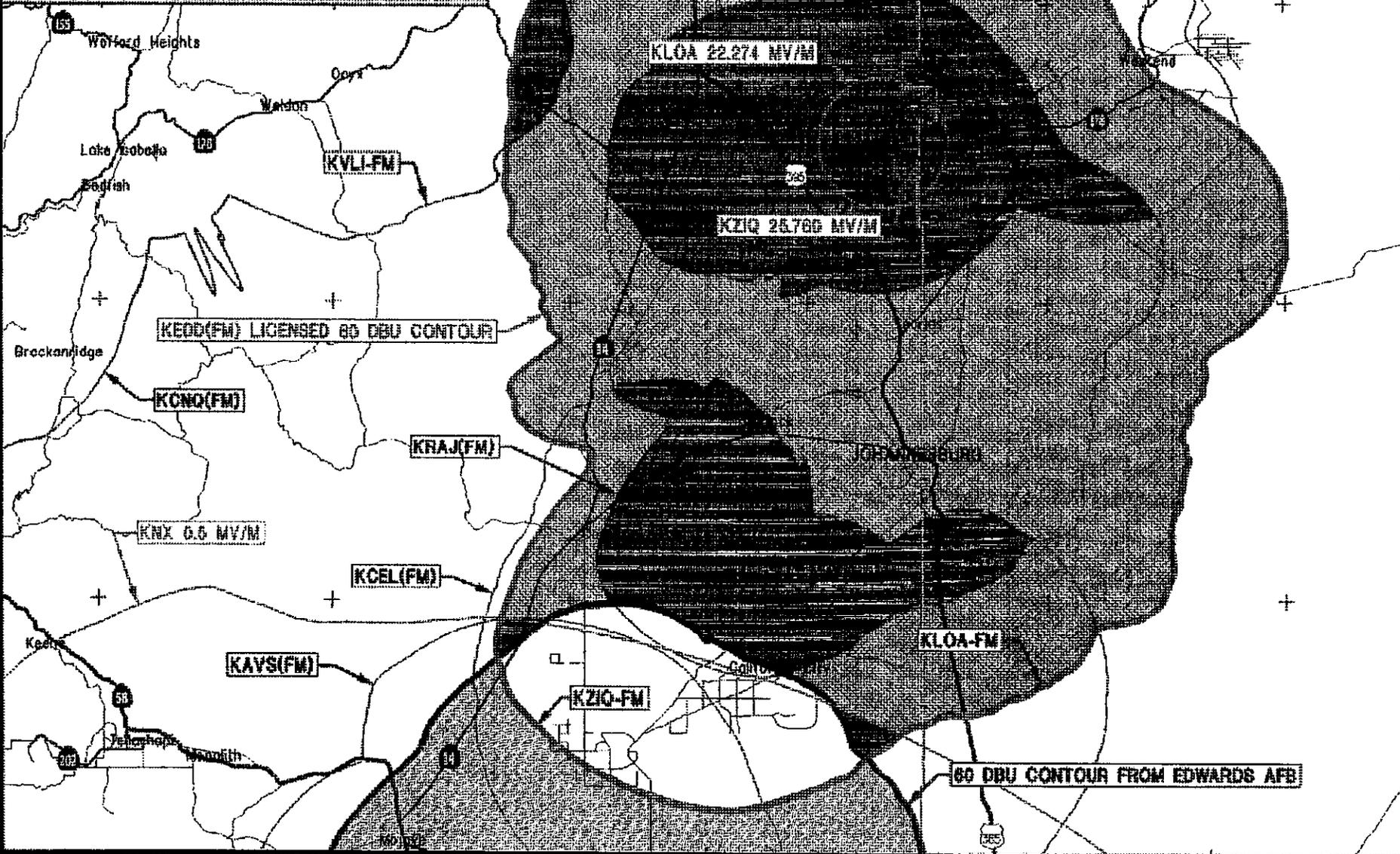
Scale 1 : 527,401

EXHIBIT E-4E

KEDD(FM) PROPOSED LOSS AREA  
AND OTHER AURAL BROADCAST SERVICES  
AREAS SERVED BY 5+ STATIONS



**LAWRENCE I. MORTON ASSOCIATES**  
 PROFESSIONAL ENGINEERS  
 10000 N. 10th Street, Suite 100  
 Scottsdale, Arizona 85258



**EXHIBIT E-5  
OTHER AURAL SERVICES WITHIN KEDD(FM)  
PROPOSED LOSS AREA AT JOHANNESBURG**

High Desert Broadcasting Company

August 1999

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	1990 CENSUS POPULATION	% OF LOSS AREA
0	0.00	0.00	0.00	0	0.00
1	13.81	5.33	0.31	0	0.00
2	18.17	7.01	0.40	0	0.00
3	653.22	252.21	14.48	2	0.01
4	2,005.38	774.28	44.46	1,125	3.01
5	1,693.16	653.73	37.54	5,821	15.55
6	119.43	46.11	2.65	25,002	66.81
7	7.29	2.82	0.16	5,474	14.63
8	0.00	0.00	0.00	0	0.00
9	0.00	0.00	0.00	0	0.00
10	0.00	0.00	0.00	0	0.00
11	0.00	0.00	0.00	0	0.00
12	0.00	0.00	0.00	0	0.00
13	0.00	0.00	0.00	0	0.00
14	0.00	0.00	0.00	0	0.00
15	0.00	0.00	0.00	0	0.00
16	0.00	0.00	0.00	0	0.00
17	0.00	0.00	0.00	0	0.00
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
<b>TOTALS:</b>	<b>4,510.46</b>	<b>1,741.50</b>	<b>100.0 %</b>	<b>37,424</b>	<b>100.0 %</b>

**EXHIBIT E-6**  
**STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES**  
**WITHIN KEDD(FM) PROPOSED LOSS AREA**

High Desert Broadcasting Company  
August 1999

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KZIQ-FM	RIDGECREST	CA	92.7 MHz
2	KAVS(FM)	MOJAVE	CA	97.7
3	KRAJ(FM)	JOHANNESBURG	CA	100.9
4	KCNQ(FM)	KERNVILLE	CA	102.5
5	KSSI(FM)	CHINA LAKE	CA	102.7
6	KWTY(FM)	CARTAGO	CA	102.9
7	KVLI-FM	LAKE ISABELLA	CA	104.5
8	KLOA-FM	RIDGECREST	CA	104.9
9	KCEL(FM)	CALIFORNIA CITY	CA	106.9
10	KFI	LOS ANGELES	CA	640. kHz
11	KNX	LOS ANGELES	CA	1070
12	KLOA	RIDGECREST	CA	1240
13	KZIQ	RIDGECREST	CA	1360

KFI 0.5 MV/M CONTOUR ENCOMPASSES ENTIRE MAP

KNX 0.5 MV/M KEDD(FM) LICENSED 80 DBU CONTOUR

KAYC 21765 MV/M

KAVS(FM)

KO98(FM)

EDWARDS AFB

KCEL(FM)

80 DBU CONTOUR FROM EDWARDS AFB

KGMX(FM)

KKZQ(FM)

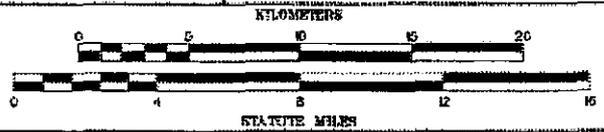
KTPK(FM)

KAVL 14238 MV/M

KLKX(FM)

CENTER OF MAP:  
N LAT 34° 58' 39.00"  
W LON 117° 50' 06.00"  
Scale 1 : 334,073

EXHIBIT E-7A  
KEDD(FM) PROPOSED GAIN AREA  
AND OTHER AURAL BROADCAST SERVICES  
AREAS SERVED BY 2 STATIONS



LAWRENCE T. MORTON ASSOCIATES  
Telecommunications Engineers  
Hollywood Hills, California

KFI 0.5 MV/M CONTOUR ENCOMPASSES ENTIRE MAP

[KNX 0.5 MV/M] [KEDD(FM)] LICENSED 60 DBU CONTOUR

KAVC 21.765 MV/M

[KAVS(FM)]

[KOSS(FM)]

EDWARDS AFB

[KCEL(FM)]

60 DBU CONTOUR FROM EDWARDS AFB

[KQMX(FM)]

[KKZO(FM)]

[KTPK(FM)]

KAVL 14.205 MV/M

[KCLK(FM)]

CENTER OF MAP:  
N LAT 34° 58' 38.00"  
W LON 117° 50' 08.00"  
Scale 1 : 894,073

EXHIBIT E-78  
KEDD(FM) PROPOSED GAIN AREA  
AND OTHER AURAL BROADCAST SERVICES  
AREAS SERVED BY 3 STATIONS



LAWRENCE L. MORTON ASSOCIATES  
Telecommunications Engineers  
HOLLYWOOD BLVD., CALIFORNIA

KFI 0.5 MV/M CONTOUR ENCOMPASSES ENTIRE MAP

KDX 0.5 MV/M KEDD(FM) LICENSED 60 DBU CONTOUR

KAVC 21,765 MV/M

KAVS(FM)

KOSS(FM)

EDWARDS AFB

KCEL(FM)

60 DBU CONTOUR FROM EDWARDS AFB

KGMX(FM)

KKZQ(FM)

KTP(FM)

CENTER OF MAP:

N LAT 34° 58' 38.00"

W LON 117° 50' 06.00"

Scale 1 : 334,073

EXHIBIT E-7C

KEDD(FM) PROPOSED GAIN AREA  
AND OTHER AURAL BROADCAST SERVICES  
AREAS SERVED BY 4 STATIONS

KILOMETERS



STATUTE MILES

LAWRENCE L. MORTON ASSOCIATES

10000 N. UNIVERSITY AVENUE, SUITE 100  
DENVER, COLORADO 80202

**EXHIBIT E-8**  
**OTHER AURAL SERVICES WITHIN KEDD(FM)**  
**PROPOSED GAIN AREA AT EDWARDS AFB**  
 High Desert Broadcasting Company  
 August 1999

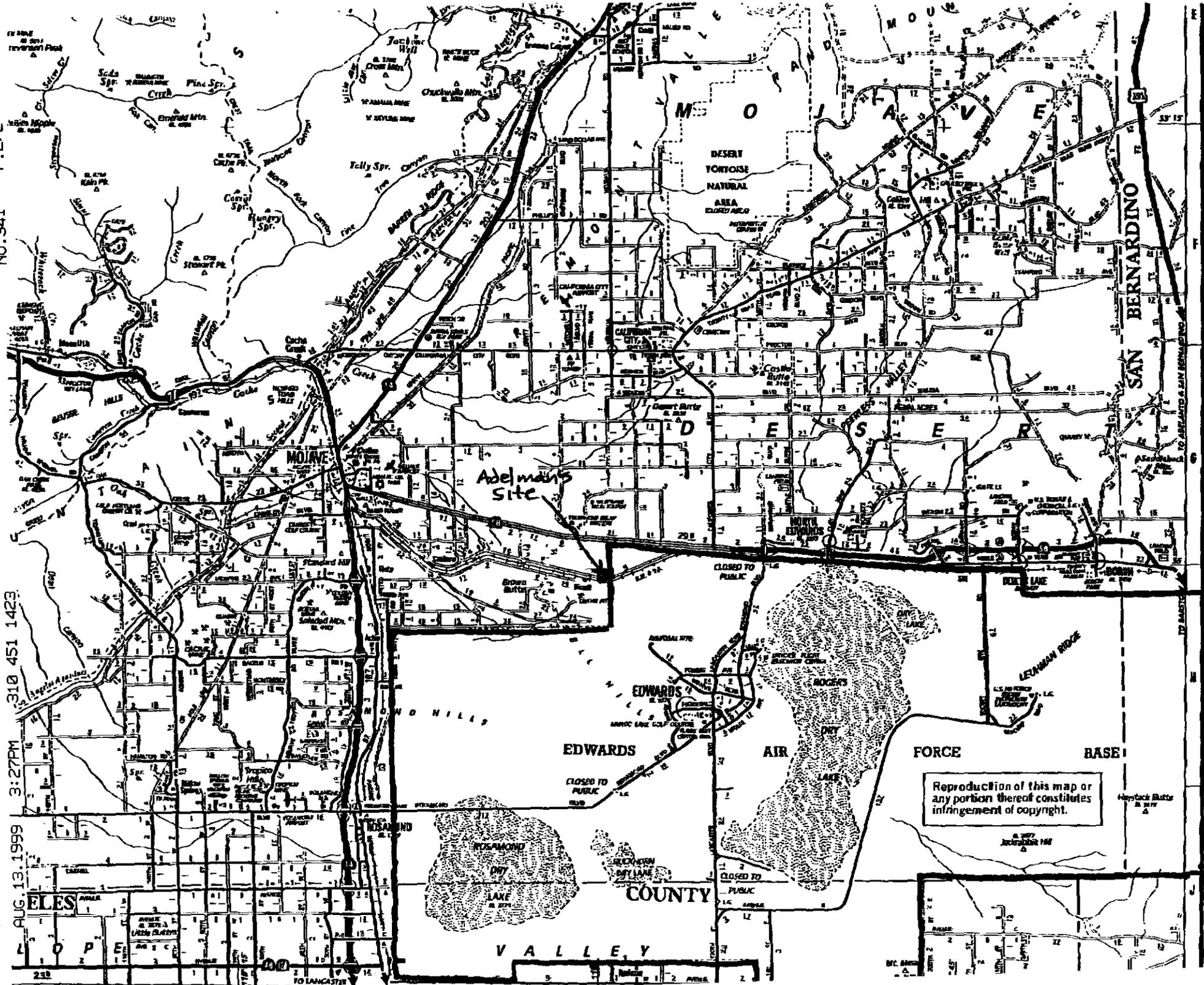
NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF GAIN AREA	1990 CENSUS POPULATION	% OF GAIN AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	140.69	54.32	6.85	142	0.61
3	285.78	110.34	13.92	2,910	12.43
4	319.66	123.42	15.57	1,549	6.62
5	149.96	57.90	7.31	14	0.06
6	449.99	173.74	21.92	3,805	16.25
7	108.43	41.86	5.28	1,011	4.32
8	545.80	210.74	26.59	13,980	59.72
9	52.11	20.12	2.54	0	0.00
10	0.00	0.00	0.00	0	0.00
11	0.00	0.00	0.00	0	0.00
12	0.00	0.00	0.00	0	0.00
13	0.00	0.00	0.00	0	0.00
14	0.00	0.00	0.00	0	0.00
15	0.00	0.00	0.00	0	0.00
16	0.00	0.00	0.00	0	0.00
17	0.00	0.00	0.00	0	0.00
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
<b>TOTALS:</b>	<b>2,052.42</b>	<b>792.44</b>	<b>100.0 %</b>	<b>23,411</b>	<b>100.0 %</b>

**EXHIBIT E-9**  
**STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES**  
**WITHIN KEDD(FM) PROPOSED GAIN AREA**

High Desert Broadcasting Company  
August 1999

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KLKX(FM)	ROSAMOND	CA	93.5 MHz
2	KAVS(FM)	MOJAVE	CA	97.7
3	KKZQ(FM)	TEHACHAPI	CA	100.1
4	KTPI(FM)	TEHACHAPI	CA	103.1
5	KOSS(FM)	ROSAMOND	CA	105.5
6	KGMX(FM)	LANCASTER	CA	106.3
7	KCEL(FM)	CALIFORNIA CITY	CA	106.9
8	KAVL	LANCASTER	CA	610. kHz
9	KFI	LOS ANGELES	CA	640
10	KNX	LOS ANGELES	CA	1070
11	KAVC	MOJAVE	CA	1340

**EXHIBIT B**

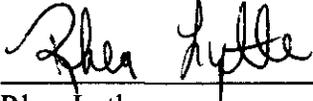


**CERTIFICATE OF SERVICE**

I, Rhea Lytle, do hereby certify that I have this 16th day of August, 1999, mailed by first-class United States mail, postage prepaid, copies of the foregoing "COMMENTS" to the following:

Nancy Joyner\*  
Federal Communications Commission  
Mass Media Bureau  
445 12th Street, S.W.  
Room 3-A267  
Washington, D.C. 20554

David M. Hunsaker, Esq.  
John C. Trent, Esq.  
Putbrese, Hunsaker & Trent, P.C.  
100 Carpenter Drive, Suite 100  
P.O. Box 217  
Sterling, VA 20167-0217

  
\_\_\_\_\_  
Rhea Lytle

**\*Hand Delivery**