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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
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Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Arriba, Colorado) )

MM Docket No. 01-18 )  
RM-10026

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**COUNTERPROPOSAL**

KKDD-FM Broadcasters, LLC. ("KSIR"), licensee of Station KSIR-FM, Brush, Colorado and Metropolitan Radio Group, Inc. ("KNKN"), licensee of Station KNKN(FM), Pueblo, Colorado, ("jointly "KSIR/KNKN") by its respective counsel, hereby submit this Counterproposal to the Notice of Proposed Rule Making, 16 FCC Rcd \_\_\_\_\_, DA 01-106, released January 26, 2001, in the above captioned proceeding. KSIR proposes to substitute Channel 296C for Channel 296C1 and change the community of license for Station KSIR from Brush to Bennett, Colorado as its first local service. This proposal requires only that Station KNKN, Pueblo, Colorado change channels from 296C2 to Channel 295C2 at a new transmitter site.<sup>1</sup> In support hereof, KSIR/KNKN states as follows:

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1. On February 14, 2001, KSIR and KNKN simultaneously filed contingent applications pursuant to Section 75.3517 of the Commission's Rules which would enable KSIR to upgrade to a Class C at Brush (BPH-20010214ACE) and KNKN would change channels and transmitter sites (BPH-20010214ACF). The instant counterproposal is a separate matter and is in no way dependent on favorable action on the applications. Should the applications be granted, both licensees will construct the authorized facilities. Should the rule making proposal be granted both licensees will implement the rule making regardless of the outcome of the applications.

1. KSIR hereby states that should the instant Counterproposal be granted, it will apply for Channel 296C at Bennett and construct the authorized facility.

2. As indicated in the attached Engineering Statement, Channel 296C at the proposed reference coordinates conflicts with the proposed allotment of Channel 297A at Arriba, Colorado. Although, as will be discussed herein, a first local service at Bennett should be preferred under the Commission's allotment priorities over a first local service at Arriba there are numerous alternate Class A channels available to Arriba to eliminate the conflict.

### **CHANGE IN COMMUNITY OF LICENSE**

3. In Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, ("Community of License"), 4 FCC Rcd 4870 (1989) , recons. granted in part, 5 FCC Rcd 7094 (1990), the Commission stated that in order to grant a change in community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities.

4. As indicated in the Engineering Statement, Exhibit E, Figure 1, the proposed use of Channel 296C at Bennett is mutually exclusive with its current use at Brush. Brush will continue to receive local service from Stations KSIR(AM), 1010 kHz and Station KPRB(FM), 106.3 MHz. Bennett (population 1,757 - 1990 U.S. Census) will receive a first local service while Brush (population 4,165) currently has three stations (Priority 4). See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982), recons. denied, 56 RR 2d 448 (1983).<sup>2</sup>

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2. As part of this comparison, and as will be discussed later, a small gray area (88 persons) is  
(continued...)

5. The community of Bennett is not located in an Urbanized Area and the proposed principal community contour (70 dBu) will not cover 50% or more of any Urbanized Area.

6. Bennett fully satisfies the Commission's definition of a community and has a need for a first local service. Bennett, Colorado is an established community whose residents share common interests and identity with their community. The Town of Bennett has a population of 1,757 according to the 1990 U.S. Census. According to Bennett's Town Planner, Mr. James Calvery, the estimated current population for the Town of Bennett is approximately 2,000. The Town is continuing to grow by annexing more land for new subdivisions, and within five (5) years the Town Planner expects the population to reach approximately 10,000.

7. The Town of Bennett has a mayor/city council form of government. The mayor and the city council are elected officials, each holding a four-year term. The current mayor for the Town of Bennett is Alfred Pedro. Bennett has its own post office and zip code (80102). The Town of Bennett operates its own police department in conjunction with Adams County and Arapahoe County. Two (2) full-time officers are employed by the Town of Bennett. Bennett also has its own fire department with four (4) full-time firefighters and six (6) volunteer firefighters. Bennett provides a number of different municipal services to its residents, including water and sewer services. Children attend school in the Bennett School District (District 29J), which includes Bennett Elementary School, Bennett Middle School and Bennett High School. The Town of Bennett has its own public library, which is part of the Adams County Public Library System. It also has its own newspaper, the *1-70 Scout*. See Exhibit A.

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2. (...continued)  
created by the deletion of Channel 296C1 at Brush but a second aural service (gray area) of 166 persons is to be provided by the allotment of Channel 296C to Bennett (Priority 2). This is an additional factor in favor of the proposal.

8. The Town of Bennett has a distinct cultural identity which is reflected in its unique and colorful history, and in its various community events and celebrations. Incorporated in 1930, the Town of Bennett was established as a settlement in the late 1800's as a stage coach station, and the first continuous east/west railroad route ran through the town. The Town of Bennett offers a number of annual activities, including the Harvest Festival, which includes a rodeo and parade, a Community Easter Egg Hunt, Fireworks Program, Turkey Shoot, Breakfast with Santa and Parade of Lights. The Town of Bennett also has its own Parks and Recreation Department that offers soccer, baseball and softball leagues for adults and youth. The Town of Bennett also maintains four (4) public parks -- Troupp, Brothers Four, Centennial and Bennett Memorial. See Exhibit A.

9. There are approximately 200 local businesses in the Town of Bennett. A number of businesses identify with the Town by using "Bennett" in their name, such as, Bennett Super, a grocery store and the third largest employer of Bennett residents, Bennett Video, Bennett Welding, Bennett Gas and Food, Bennett Excavating, Bennett Mini Storage, Bennett Veterinary Clinic, Bennett Pak N' Stack Mini Storage and Bennett Licensed Day Care. There are also several churches in Bennett -- Bennett Baptist Church, Bennett Presbyterian Church and Christ Our Redeemer Lutheran Church. See Exhibit A.

10. Although the town residents use area hospitals and clinics outside of Bennett for medical services, the Town of Bennett does have a number of local health care professionals (dentists and physicians) as well as a rehabilitation/physical therapy clinic, Eastern Plains Rehabilitation Clinic.

## **II. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES**

### **A. Station KSIR-FM Bennett, Colorado**

11. As indicated in the attached channel study, Figure 1, Channel 296C can be allotted to Bennett in compliance with Section 73.207 and provide a 70 dBu signal over Bennett (Figure 2), provided a channel substitution is made for KNKN, Pueblo, Colorado.

12. The upgrade in class for Station KSIR-FM, as proposed, will result in a net gain in population of 1,167,627 persons and a net gain in area of 11,292 sq. km. See Figure 3. Although a small gray area of 88 persons in 386 sq. km. area will be created, this loss is outweighed by the provision of a second service (gray area) to 166 persons in a 490 sq. km area. See Figures 4(b). See e.g., Silverton and Bayfield, Colorado, 14 FCC Rcd 21502 (1999).<sup>3</sup> Nevertheless, if the Commission is still concerned with the loss of a second aural service to 88 persons, KSIR/KNKN offers a new allotment of Channel 238C3 at Pine Bluffs, WY which will cover this gray area entirely. KSIR states that it will apply for the Pine Bluffs channel if allotted and construct the authorized facility. This proposal is discussed further herein.

### **B. Station KNKN Pueblo, Colorado**

13. In order to allot Channel 296C to Bennett, Channel 295C2 must be substituted for Channel 296C2 for Station KNKN at Pueblo, Colorado at a new transmitter site. KNKN is a joint party and thereby evidences its consent to the changes in channel and transmitter site. In this regard,

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3. This analysis of loss of gray area service is based on actual facilities. If KSIR-FM were considered a maximum Class C1 facility, then the potential loss of service is 106 persons in a 473 sq. km. The provision of a second aural service from Channel 296C at Bennett will still outweigh the small increase in the creation of gray area. Nevertheless, based on the Community of License decision, the proper comparison should be the loss of existing service. Supra 5 FCC Rcd 7094 at 7097, para. 19.

as mentioned in note 1, KNKN has already filed its application for Channel 295C2 at a new transmitter site (BPH-20010214ACF). Figure 5 is a channel study showing compliance with the Commission's spacing requirements for KNKN at the new transmitter site. A showing of city grade coverage (Figure 6) and gain/loss coverage areas, (Figure 7) are also provided in the Engineering Statement.

**C. Channel 297A  
Arriba, Colorado**

14. Under the Commission's allotment priorities, a first local service at Bennett (population 1,757 - 1990 U.S. Census) would be preferred over a first local service to Arriba (population 220 - 1990 U.S. Census). See e.g., Three Oaks and Bridgman, Michigan, 5 FCC Rcd 1004 (1990); Pitkin, Louisiana, et al., 15 FCC Rcd 17311 (2000). In addition, the Bennett proposal will provide a net gain in second aural service (Priority 2) to 78 persons, and a net increase in area of 104 sq. km as demonstrated in Figure 4(b).

15. Nevertheless, KSIR/KNKN has determined that there are numerous other Class A channels available for Arriba, including Channel 300A, see Figure 8, which can also be allotted as Class C3 or Channel 240A, see Figure 11.

**D. Channel 238C3  
Pine Bluffs, Wyoming**

16. As discussed earlier, the deletion of Channel 296C1 at Brush will create a small gray area of 88 persons. This loss will be outweighed by the provisions of a second aural service (elimination of gray area) to 166 persons by the reallocation of Channel 296C to Bennett. However, should the Commission prefer that the proposal avoid the creation of any gray area, KSIR proposes the allotment of Channel 238C3 to Pine Bluffs, Wyoming. See Figures 9 and 10. Since Pine Bluffs

already has an allotment (which does not reach this gray area), no showing of community indicia is required. KSIR will apply for Channel 238C3 if allotted and construct the facility if authorized.

17. The proposal for Pine Bluffs should not be considered as contingent because it is offered as a replacement service for the small gray area in the event the Commission prefers that there should be no gray area created. See e.g., Anniston, Alabama and College Park, Georgia, et al., 15 FCC Rcd 9971 (2000), recons. denied 16 FCC Rcd \_\_\_\_ (2001), recons. pending, (where new allotments were made at Anniston and Ashland, Alabama to replace gray area created by the removal of Station WHMA, Anniston, Alabama).

#### **OTHER PUBLIC INTEREST BENEFITS**

18. In addition to (1) a first local service to Bennett; (2) the provision of a second aural service to 166 persons; and (3) a second FM allotment at Pine Bluffs, Wyoming, if needed; the Counterproposal will provide a net overall gain to 1,115,048 persons and a net gain in area of 13,807 sq. km. See Figure 12.

19. Accordingly, for the reasons stated, KSIR/KNKN respectfully requests that the Commission grant this Counterproposal to reallocate Channel 296 from Brush to Bennett, substitute Channel 295C2 for Channel 296C2 at Pueblo, and, if necessary, Channel 238C3 at Pine Bluffs, Wyoming.

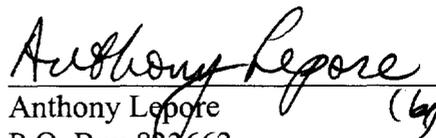
Respectfully submitted,

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March 19, 2001

# **Engineering Statement**

**In Support of a**

**Counterproposal**

**MM Docket 01-18, RM-10026**

**KKDD-FM Broadcasters, LLC**

**March 19, 2001**

**Prepared by:**



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**Engineering Statement  
In Support of a  
Counterproposal  
MM Docket 01-18, RM-10026  
KKDD-FM Broadcasters, LLC**

**C O N T E N T S**

**FOR ENGINEERING EXHIBITS**

1.	Statement of Engineers	1-7
2.	Table 1	Summary of communities and channels
3.	Exhibit E, Figure 1	Allocation study for channel 296C, KSIR.P, Bennett, CO
4.	Exhibit E, Figure 2	KSIR.P 70 dBu contour map
5.	Exhibit E, Figure 3	KSIR.P gain and loss area map
6.	Exhibit E, Figure 4	Map of remaining services for KSIR.P
7.	Exhibit E, Figure 4(a)	Facilities in remaining services study
8.	Exhibit E, Figure 4(b)	Gray area eliminated by AD296C
9.	Exhibit E, Figure 5	Allocation study for channel 295C2, KNKN (296C2) Pueblo, CO
10.	Exhibit E, Figure 6	Channel 295C2 70 dBu contour map, KNKN Pueblo, CO
11.	Exhibit E, Figure 7	KNKN.P gain and loss area map
12.	Exhibit E, Figure 8	Allocation study for channel 300A, (AD Channel 297A), Arriba, CO
13.	Exhibit E, Figure 9	Allocation study for channel 238C3, Pine Bluffs, WY
14.	Exhibit E, Figure 10	KSIR Grey Area Elimination and AD 238C3 60/70 dBu map
15.	Exhibit E, Figure 11	Allocation study for channel 240A (Alternate Channel) Arriba, CO
16.	Exhibit E, Figure 12	Cumulative gain/loss study

## **Engineering Statement**

### **In Support of a Counterproposal**

**MM Docket 01-18, RM-10026  
KKDD-FM Broadcasters, LLC**

#### **General**

The instant counterproposal was prepared for KKDD-FM Broadcasters, LLC ("KSIR"), licensee of KSIR, channel 296C1, Brush, Colorado. It is prepared and submitted in response to an NPRM for MM Docket 01-18 (see DA01-186). KSIR proposes to delete channel 296C1 at Brush and subsequently allocate channel 296C at Bennett, Colorado. They propose that the license of KSIR be modified accordingly. Only one channel change, which includes a site modification, is required to implement the instant counterproposal.

The instant counterproposal is mutually exclusive (MX) with the NPRM in its proposed use of channel 297A at Arriba, Colorado. However, a substitute channel, 300A, is available for use at Arriba. Channel 300 can only be used at Arriba if Channel 297A is not allotted. It should be noted that Channel 300A can also be used at Arriba at a class C3, while Channel 297A has a site restriction to eliminate short spacing to the licensed site of KSIR. If for some technical reason unknown to KSIR, Channel 300A cannot be allotted to Arriba, KSIR proposes the substitution of Channel 240A for Channel 297A. Channel 240A is available without any additional spectrum changes. Also, if Channel 240A is not available, numerous other channels are available for substitution at Arriba. Therefore, if the Commission adopts the KSIR counterproposal as submitted, it can use a proposed substitute channel of 300A or 240A at Arriba as a first local service.

## **Methods**

The KSIR counterproposal is presented in sections, in which each channel or licensed facility where a change is proposed discussed individually. All sections begin with an allocation or channel spacing study. Additional exhibits then support the proposed modification's technical compliance.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.1.586. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted using a professional mapping program from MapInfo Corporation, Version 5.5. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

All modifications that require a class change or antenna site modification have a gain/loss study for population and square kilometers. The one facility that requires a community of license change includes a remaining services study that demonstrates no white area is created by the KSIR counterproposal. A small gray area is also eliminated by the allotment of Channel 238C3 at Pine Bluffs, Wyoming. An expression of interest in the allotment is included in the legal section of the KSIR counterproposal.

### **Nature of the KSIR Counterproposal**

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. KSIR proposes to delete channel 296C1 at Brush and substitute channel 296C at Bennett, Colorado for use by KSIR. In order to accomplish this, one proposed allotment and one licensed facility needs to be modified in order to create compliance with §73.207. The counterproposal provides for first local service at Bennett, Colorado and second local service at Pine Bluffs, Wyoming. The proposed allotment of channel 296C at Bennett provides gray area coverage to 166 persons. It creates a large increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served within the new 60 dBu contour.

The allotment of channel 296C at Bennett requires the following modifications:

- I). KNKN.L - channel 296C2, Pueblo, Colorado The allotment of channel 296C at Bennett creates a short-space to the channel 296C2 allocation at Pueblo of 67.35 kilometers. In order to eliminate this short-spacing, KSIR propose to substitute KNKN first adjacent channel 295C2 at a modified allotment and antenna site. The substitution of channel 295C2 for channel 296C2 at Pueblo will require no additional modifications to the spectrum.

In addition, KSIR proposes the allotment of channel 238C3 at Pine Bluffs, Wyoming. The deletion of channel 296C1 at Brush creates a small gray area (473.0 sq km and 106 persons if KSIR is considered as a maximum C1 and 386.0 sq. KM and 88 persons if the KSIR licensed facility is considered). In the instant counterproposal, KSIR proposes to eliminate this gray area entirely by allotting channel 238C3 to Pine Bluffs, Wyoming as

that community's first local service. This allotment does not require any additional spectrum changes.

## **EXHIBITS EXPLAINED**

### **KSIR**

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 296C at Bennett. The study depicts both of the major on-channel and adjacent channel modifications required, and there are no subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KSIR channel 296C allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of Bennett. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a map depicting the gain and loss areas as a result of channel 296C1 being deleted at Brush and allocated to Bennett as channel 296C. Exhibit E, Figure 4 is a map of the remaining services in the loss area created by the deletion of channel 296C1 at Brush. Exhibit E, Figure 4(a) is list of the facilities included in Exhibit E, Figure 4. The numbers shown for the contours in Exhibit E, Figure 4(a) correspond to the facilities in Exhibit E, Figure 4. Exhibit E, Figure 4(b) is a map showing the gray area that the proposed allotment of channel 296C at Bennett eliminates. The population inside this area is 166 persons. FAA approval has been granted for a site within 1.5 km of the allocation site for a maximum class C tower.

### **KNKN (AL295C2)**

Exhibit E, Figure 5 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 295C2 for channel 296C2 at the proposed

allotment coordinates. The study depicts no major on-channel and adjacent channel modifications required. The only change for this substitution is the site change proposed for KNKN itself. Exhibit E, Figure 6 is a 70 dBu contour for a class C2 facility and the community boundaries of Pueblo. The map depicts full compliance with the requirements of §73.315 of the Rules. Exhibit E, Figure 7 is a gain and loss area map depicting the respective areas created by the site modification of KNKN.

#### AD 300A (AD297A)

Exhibit E, Figure 8 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 300A for channel 297A at Arriba, Colorado, with no site restriction. Channel 300 can also be used at Arriba as a class C3.

#### AD 238C3

Exhibit E, Figure 9 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 238C3 at Pine Bluffs, Wyoming. It depicts that no additional spectrum changes are required to make this allotment. Exhibit E, Figure 10 is a combination map depicting the gray area created by the deletion of channel 296C1 at Brush and its subsequent allotment as channel 296C at Bennett. The map depicts that the 60 dBu of channel 238C3 at Pine Bluffs completely eliminates all gray area. The population inside the gray area (when KSIR's licensed facility is considered) is only 88 persons. When KSIR is considered as a maximum class C1, the population inside the gray increases to 106 persons. In addition, the 70 dBu contour on the map demonstrates compliance with §73.315 of The Rules.

## AD 240A

Exhibit E, Figure 11 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 240A for channel 297A at Arriba. The study shows that this proposed substitution can be made using the community of Arriba reference coordinates and that no additional spectrum modifications are required to use this substitution. KSIR request that this channel be considered only if channel 300A is not available for allotment at Arriba. Furthermore, if channels 300A or 240A are not available for substitution at Arriba, KSIR request the Commission consider channels 222A, 248A, 283A, 285A, 287A, 288A or 291A.

## **Conclusion**

The KSIR counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces one new first local service: Bennett, Colorado, a community of 1,931 persons; and a second local service: Pine Bluffs, Wyoming, a community of 1,132 persons, (all according to the 1990 US Census Bureau). It also proposes an upgrade of KSIR to a full class C. In addition, the residents of Arriba, Colorado will be able to have a first local service on any one of a variety of available channels. The counterproposal creates a cumulative net increase in new 60-dBu service to 13,807 square kilometers and 1,115,048 persons. See Exhibit E, Figure 12.

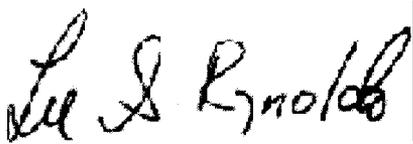
**Statement of the Consultants**

The instant engineering portion of a counterproposal was prepared for KKDD-FM Broadcasters, LLC (“KSIR”) and supports a counterproposal to MM Docket 01-18, RM-10026. It was developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to the Commission by KSIR.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:

A handwritten signature in black ink, reading "Lee S. Reynolds", is written over a horizontal line. A vertical line is drawn to the right of the signature, extending from the top of the signature down to the horizontal line.

Lee S. Reynolds

March 17<sup>th</sup>, 2001

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**Engineering Statement  
In Support of a  
Counterproposal  
MM Docket 01-18, RM-10026  
KKDD-FM Broadcasters, LLC**

**Summary of Channel Assignments**

(Depicting all communities, channels, and modifications)

<b>COMMUNITY</b>	<b>PRESENT</b>	<b>PROPOSED</b>	<b>COMMENTS</b>
Bennett, CO	-----	<b>296C</b>	Delete channel 296C1 at Brush, CO and change community of license to Bennett, CO on Ch 296C as a first local service
Brush, CO	292A, <b>296C1</b>	292A	Deletion of Ch 296C1 does not leave Brush without local service. Ch 292A will continue to operate at Brush.
Pueblo, CO	245C, 255C, 260C, 264C, <b>296C2</b> , 300C1	245C, 255C, 260C, 264C, <b>295C2</b> , 300C1	Delete channel 296C2 at Pueblo, CO and substitute 1 <sup>st</sup> adjacent channel 295C2. Change allotment and antenna reference coordinates
Arriba, CO	<b>297A</b>	<b>300A (or 240A)</b>	Substitute Ch 300A (or Ch 240A) for NPRM channel 297A. Either substitution eliminates the short space with Ch 296C at Bennett. <u>Ch 297A is MX point for KSIR Counterproposal and Arriba NPRM.</u>
Pine Bluffs, WY	-----	<b>238C3</b>	AD Ch 238C3 which eliminates any gray area created by KSIR (Ch 296C1) deletion at Brush.

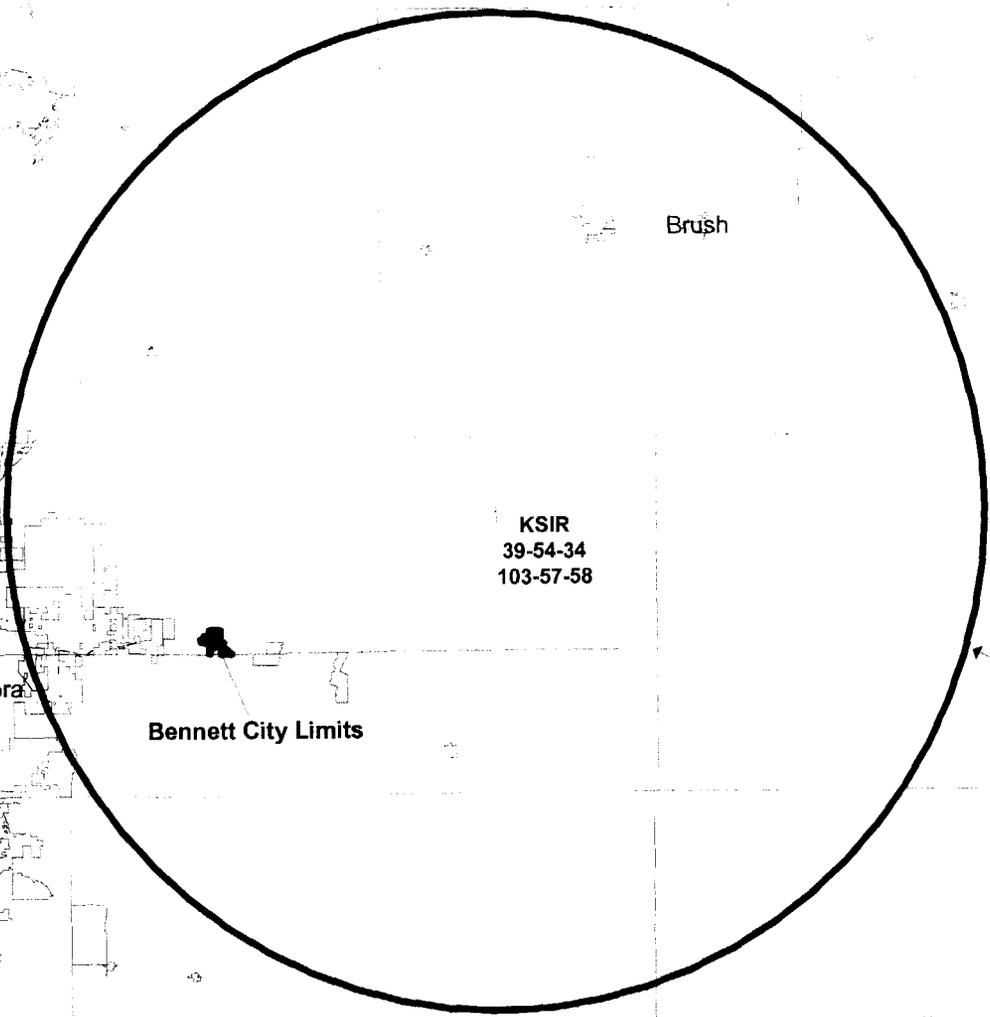
**Engineering Statement  
In Support of a  
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KKDD-FM Broadcasters, LLC**

**Allocation Study – Ch 296C Bennett, CO (KSIR)  
[Depicting spectrum changes required to allot Ch 296C]  
(Using proposed allotment coordinates as reference)**

REFERENCE			Class				DISPLAY DATES
39 54 34 N.			Current rules spacings				DATA 03-15-01
103 57 58 W.			Channel 296A -107.1 MHz				SEARCH 03-17-01
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
<b>Community of Bennett</b>			<b>CO</b>	<b>247.0</b>	<b>42.83</b>		
Reference Coordinates: North Latitude: 39-45-31 West Longitude: 104-25-36							
<b>KSIRFM 296C1 Brush</b>			<b>CO</b>	<b>343.7</b>	<b>42.09</b>	<b>270.0</b>	<b>-227.91 *</b>
Of No Concern: Licensed site of KSIR							
<b>RADD 297A</b>	<b>Arriba</b>		<b>CO</b>	<b>139.6</b>	<b>93.51</b>	<b>165.0</b>	<b>-71.49 *</b>
Of Concern: Substitution of Ch 300A (or 240A) proposed at community reference coordinates.							
<b><u>MX POINT OF INSTANT NPRM AND KSIR COUNTERPROPOSAL</u></b>							
<b>KNKN 296C2</b>	<b>Pueblo</b>		<b>CO</b>	<b>198.6</b>	<b>181.65</b>	<b>249.0</b>	<b>-67.35 *</b>
Of Concern: Substitution of Ch 295C2 proposed with antenna site change.							
<b>KKAW.C 297C3</b>	<b>Albin</b>		<b>WY</b>	<b>356.7</b>	<b>176.02</b>	<b>176.0</b>	<b>0.02 *</b>
<b>KQKS 298C</b>	<b>Lakewood</b>		<b>CO</b>	<b>257.0</b>	<b>105.38</b>	<b>105.0</b>	<b>0.38 *</b>
<b>KQKS 298C</b>	<b>Lakewood</b>		<b>CO</b>	<b>257.0</b>	<b>105.38</b>	<b>105.0</b>	<b>0.38 *</b>
<b>KQKS 298C</b>	<b>Lakewood</b>		<b>CO</b>	<b>257.0</b>	<b>105.38</b>	<b>105.0</b>	<b>0.38 *</b>
<b>KBPI 294C</b>	<b>Denver</b>		<b>CO</b>	<b>259.8</b>	<b>110.53</b>	<b>105.0</b>	<b>5.53 *</b>
<b>KNKN.P 295C2</b>	<b>Pueblo</b>		<b>CO</b>	<b>192.8</b>	<b>204.94</b>	<b>188.0</b>	<b>16.94</b>
Of Note: Channel and site change proposed in instant counterproposal to; NL: 38-06-32, WL: 104-29-18							
<b>KPVW 296C3</b>	<b>Aspen</b>		<b>CO</b>	<b>255.6</b>	<b>265.33</b>	<b>237.0</b>	<b>28.33</b>
<b>RADD 242A</b>	<b>Limon</b>		<b>CO</b>	<b>159.2</b>	<b>77.35</b>	<b>29.0</b>	<b>48.35</b>
<b>ALLO 295A</b>	<b>Minatare</b>		<b>NE</b>	<b>10.5</b>	<b>214.57</b>	<b>165.0</b>	<b>49.57</b>
<b>AVAC 297A</b>	<b>Las Animas</b>		<b>CO</b>	<b>162.6</b>	<b>214.63</b>	<b>165.0</b>	<b>49.63</b>



**KSIR, Bennett, Colorado  
Hypothetical Class C  
70 dBu Contour from  
Allocation Site**



KSIR  
39-54-34  
103-57-58

KSIR  
Hypothetical  
Class C  
70 dBu Contour

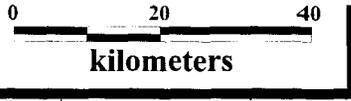
Bennett City Limits

Denver

Aurora

Brush

Exhibit E, Figure 2



Loss Area = 2,078 sq km  
Gain Area = 13,370 sq km  
Pop. Loss = 12,033  
Pop. Gain = 1,179,660

**KSIR, Bennett, Colorado  
Proposed Gain/Loss Area  
Study Map (w/Pop Counts)  
March, 2001**

Loss Area

KSIR.L  
Hypothetical  
60 dBu Contour

KSIR.L  
40-16-24  
104-06-16

Brush

AD296C  
39-54-34  
103-57-58

Denver

Aurora

Gain Area

AD296C  
Hypothetical  
Class C  
60 dBu Contour

Exhibit E, Figure 3

0 20 40  
kilometers



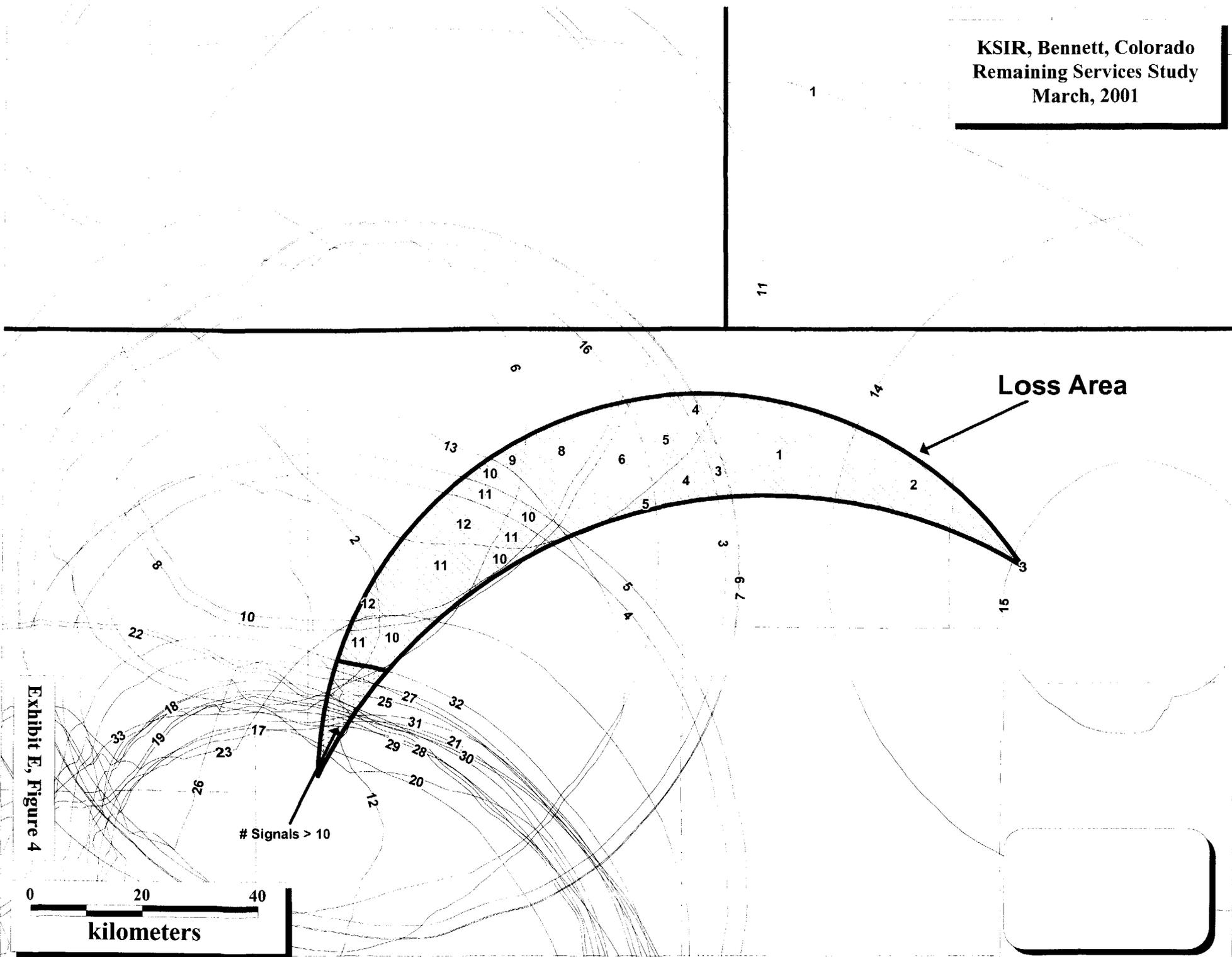


Exhibit E, Figure 4

0 20 40  
kilometers

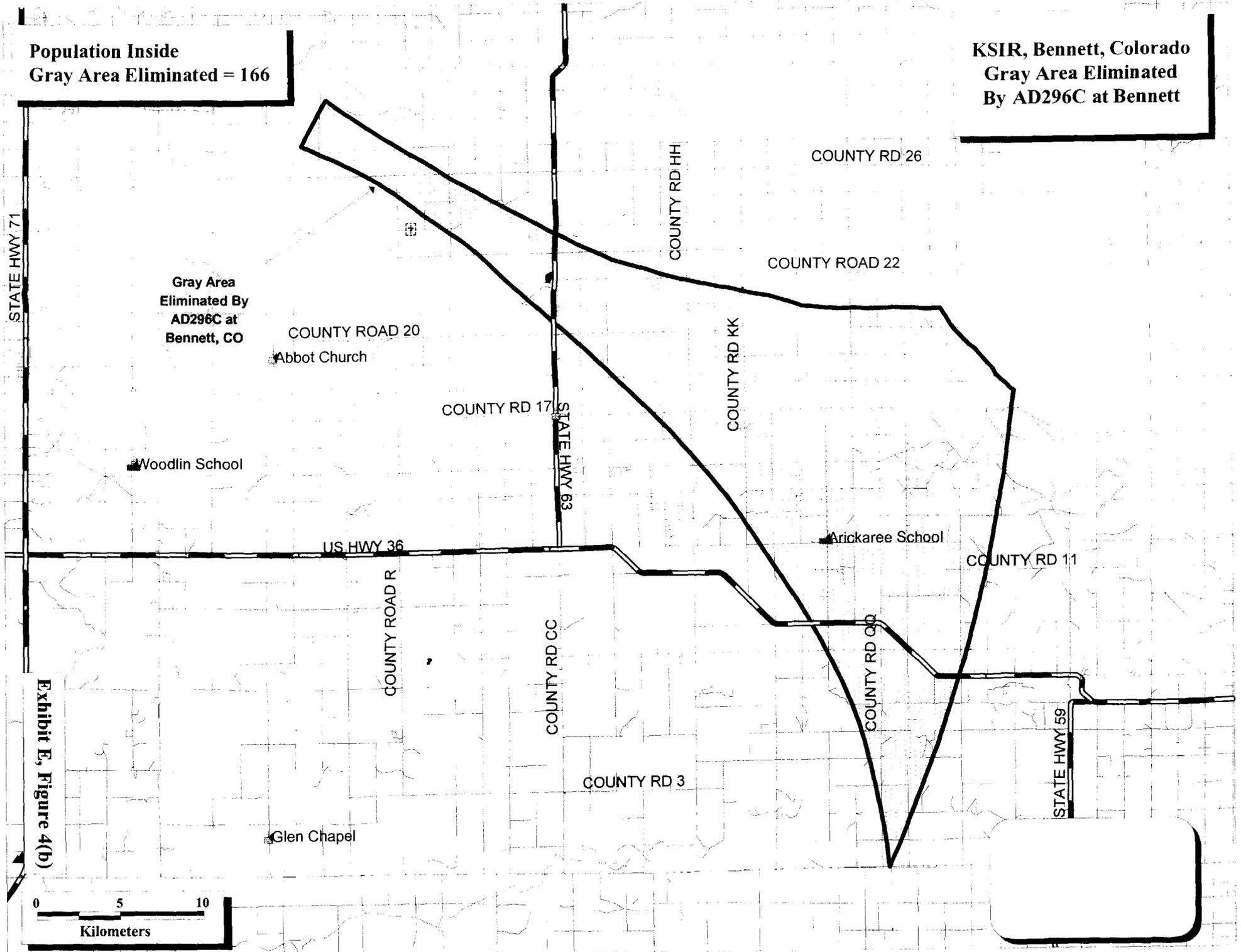
**Engineering Statement  
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KKDD-FM Broadcasters, LLC**

**List of Stations in KSIR (AD296C) Remaining Services Study**

<u>Contour #</u>	<u>Call Letters</u>	<u>City</u>	<u>State</u>	<u>Frequency (MHz)</u>
1	KOA	Denver	CO	0.850
2	KCSUFM	Fort Collins	CO	90.5
3	KUNCFM	Greeley	CO	91.5
4	KVOD	Greeley	CO	92.5
5	KTCL	Fort Collins	CO	93.3
6	NEW	Wellington	CO	94.3
7	KGLL	Greeley	CO	96.1
8	KIGN	Cheyenne	WY	97.9
9	KUADFM	Windsor	CO	99.1
10	KOLZ	Cheyenne	WY	100.7
11	KMUSFM	Burns	WY	101.9
12	KRKI	Estes Park	CO	102.1
13	KTRR	Loveland	CO	102.5
14	KNNG	Sterling	CO	104.7
15	KPMX	Sterling	CO	105.5
16	KPAW	Fort Collins	CO	107.9
17	KUVO	Denver	CO	89.3
18	KCFR	Denver	CO	90.1
19	KWBI	Morrison	CO	91.1
20	KRKSFM	Boulder	CO	94.7
21	KHIH	Denver	CO	95.7
22	KXPK	Evergreen	CO	96.5
23	KBCOFM	Boulder	CO	97.3
24	KYGOFM	Denver	CO	98.5
25	KKHK	Denver	CO	99.5
26	KIMN	Denver	CO	100.3
27	KOSI	Denver	CO	101.1
28	KRFX	Denver	CO	103.5
29	KCKK	Longmont	CO	104.3
30	KXKLFM	Denver	CO	105.1
31	KALC	Denver	CO	105.9
32	KBPI	Denver	CO	106.7
33	KQKS	Lakewood	CO	107.5

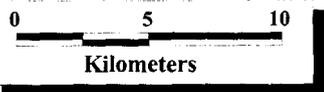
Population Inside  
Gray Area Eliminated = 166

KSIR, Bennett, Colorado  
Gray Area Eliminated  
By AD296C at Bennett



Gray Area  
Eliminated By  
AD296C at  
Bennett, CO

Exhibit E, Figure 4(b)



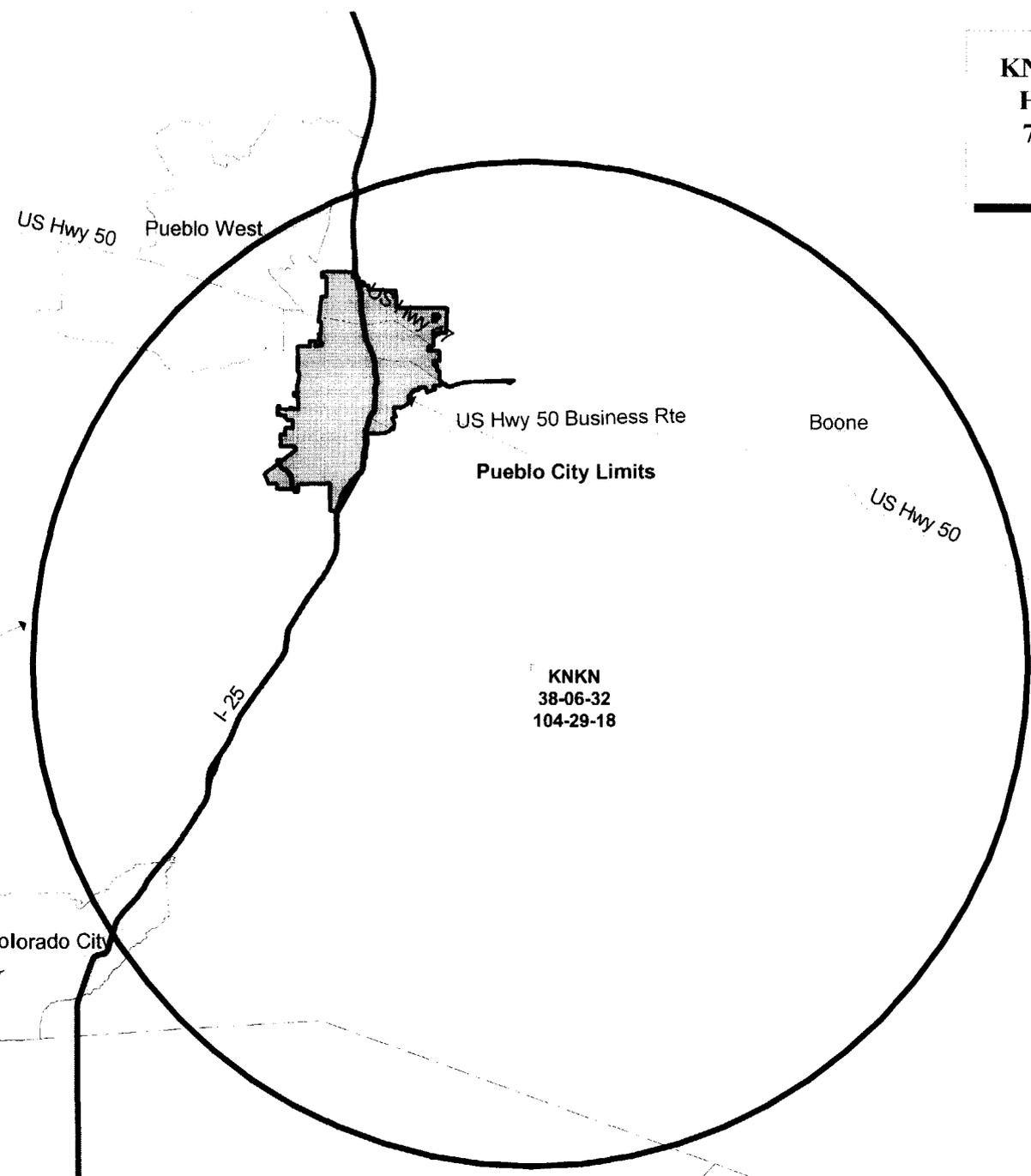
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**Allocation Study – Ch 295C3 Pueblo, CO (KNKN)**  
[Depicting no spectrum changes required to allot Ch 295C3]  
(Using proposed modified allotment coordinates as reference)

REFERENCE				Class C2		DISPLAY DATES	
38 06 32 N.						DATA	03-15-01
104 29 18 W.			Current	rules	spacings	SEARCH	03-17-01
-----		Channel	295	-106.9	MHz	-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Pueblo</b>			<b>CO</b>	<b>326.8</b>	<b>19.26</b>		
Reference Coordinates:							
North Latitude: 38-15-15							
West Longitude: 104-36-31							
<b>KNKN</b>	<b>296C2</b>	<b>Pueblo</b>	<b>CO</b>	<b>334.9</b>	<b>30.65</b>	<b>130.0</b>	<b>-99.35 *</b>
Of No Concern:							
Licensed site of KNKN							
on Ch 296C2							
KBPI	294C	Denver	CO	340.2	191.63	188.0	3.63 *
<b>KSIR.P</b>	<b>296C</b>	<b>Bennett</b>	<b>CO</b>	<b>12.8</b>	<b>204.94</b>	<b>188.0</b>	<b>16.94</b>
Of Note:							
Proposed allotment reference							
for KSIR in instant counterproposal at;							
NL: 39-54-34, WL: 103-57-58							
KKLI	292C2	Widefield	CO	335.1	77.78	58.0	19.78
KKIK.C	293C1	La Junta	CO	119.0	102.95	79.0	23.95
AVAC	297A	Las Animas	CO	92.5	111.09	55.0	56.09
KMOM.C	241C2	Fountain	CO	335.3	77.77	20.0	57.77
KMOM	241C2	Fountain	CO	335.3	77.77	20.0	57.77
KQKS	298C	Lakewood	CO	341.6	185.69	105.0	80.69
KQKS	298C	Lakewood	CO	341.6	185.69	105.0	80.69
KQKS	298C	Lakewood	CO	341.6	185.69	105.0	80.69
<b>KSIREM</b>	<b>296C1</b>	<b>Brush</b>	<b>CO</b>	<b>7.9</b>	<b>242.57</b>	<b>158.0</b>	<b>84.57</b>
Of Note:							
Present licensed site of KSIR on							
Ch 296C1							
-----							

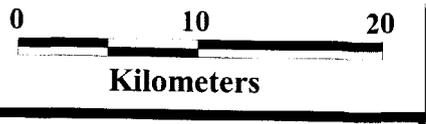


**KNKN, Pueblo, Colorado  
Hypothetical Class C2  
70 dBu Contour from  
Allocation Site**



Hypothetical  
Class C2  
70 dBu Contour

Exhibit E, Figure 6



Loss Area = 1,753 sq km  
Gain Area = 4,268 sq km  
Pop. Loss = 58,184  
Pop. Gain = 5,605

KNKN, Pueblo, Colorado  
Proposed Gain/Loss Area  
Study Map (w/Pop Counts)  
March, 2001

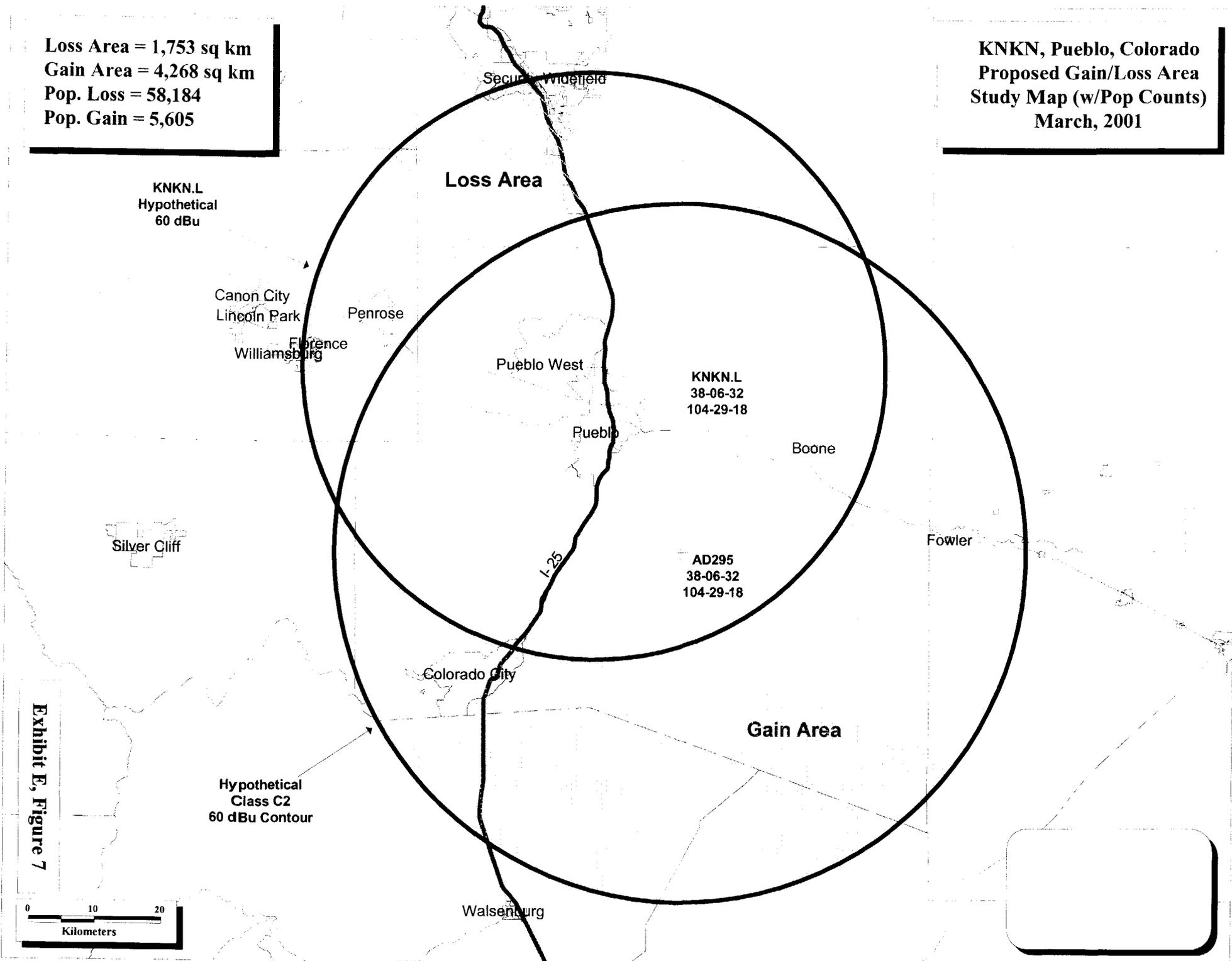


Exhibit E, Figure 7

**Engineering Statement  
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Counterproposal  
MM Docket 01-18, RM-10026  
KKDD-FM Broadcasters, LLC**

**Allocation Study – Ch 300A Arriba, CO (AD 297A)**  
[Depicting no spectrum changes required to allot Ch 300A]  
(Using community of Arriba coordinates as reference)

REFERENCE				Class A		DISPLAT DATES	
39 17 09 N.						DATA	03-15-01
103 16 30 W.			Current rules spacings			SEARCH	03-17-01
-----		Channel	300	-107.9	MHz	-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>RADD</b>	<b>297A</b>	<b>Arriba</b>	<b>CO</b>	<b>147.7</b>	<b>2.33</b>	<b>31.0</b>	<b>-28.67 *</b>
Of No Concern:							
Proposed allotment in instant							
NPRM. Proposed substitution of Ch 300A							
is MX with Ch 297A at Arriba.							
KPAW	300C1	Fort Collins	CO	317.4	210.39	200.0	10.39
KPAW.C	300C1	Fort Collins	CO	317.4	210.39	200.0	10.39
KDZAFM	300C1	Pueblo	CO	225.2	211.46	200.0	11.46
KGCR	299C1	Goodland	KS	86.7	158.01	133.0	25.01
KQKS	298C	Lakewood	CO	285.6	168.84	95.0	73.84
KQKS	298C	Lakewood	CO	285.6	168.84	95.0	73.84
KQKS	298C	Lakewood	CO	285.6	168.84	95.0	73.84
-----							



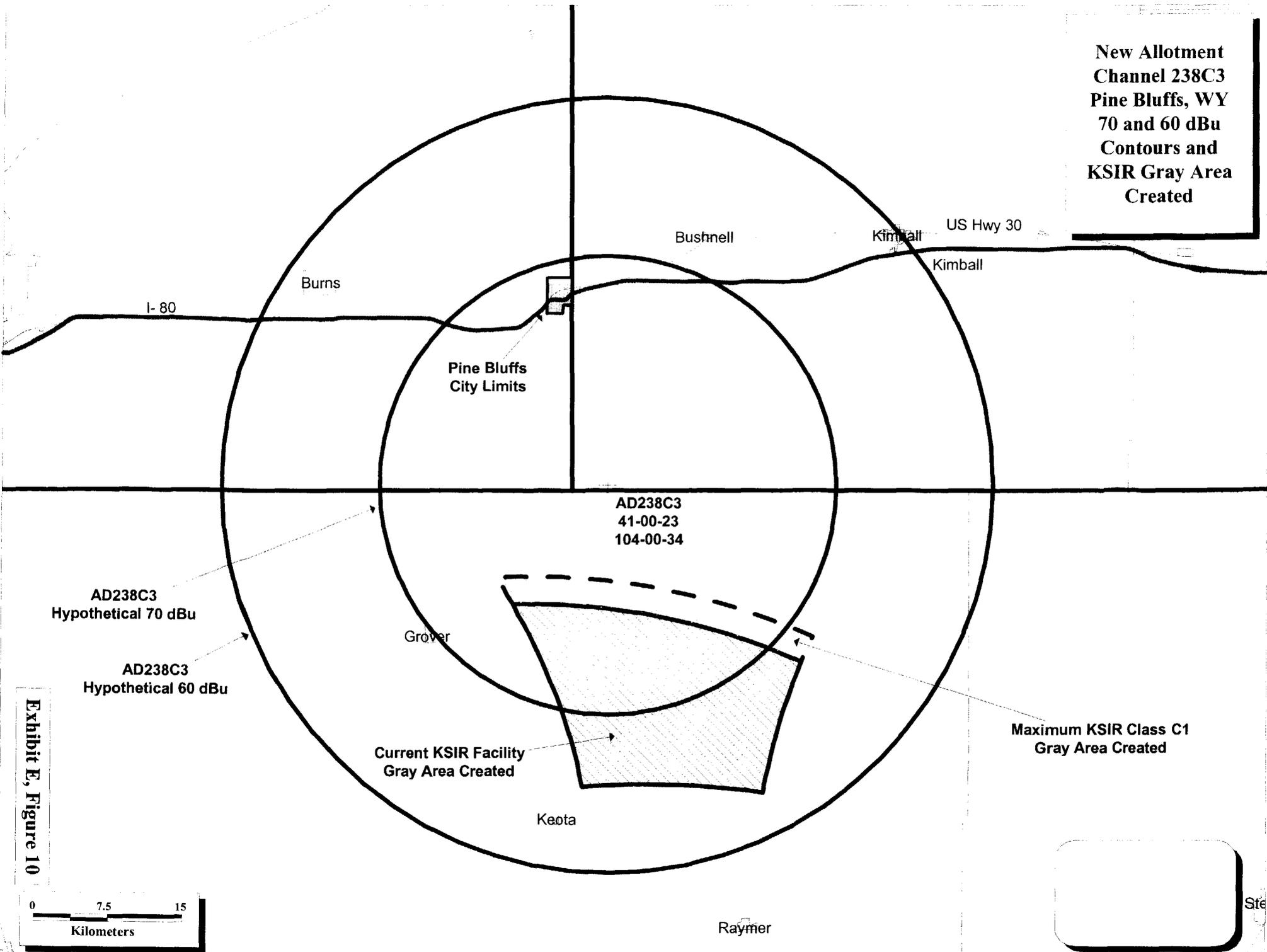
**Engineering Statement  
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KKDD-FM Broadcasters, LLC**

**Allocation Study – Ch 238C3 Pine Bluffs, WY (AD 238C3)**  
[Depicting no spectrum changes required to allot Ch 238C3]  
(Using proposed allotment coordinates as reference)

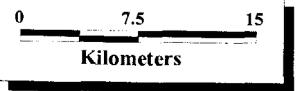
REFERENCE		DISPLAY DATES
41 00 23 N	CLASS = C3	DATA 03-15-01
104 00 34 W	Current Spacings	SEARCH 03-17-01
----- Channel 238 - 95.5 MHz -----		
Call	Channel	Location
		Dist
		Azi
		FCC
		Margin
-----		
<b>Community of Pine Bluffs</b>	<b>WY</b>	<b>20.12 345.8</b>
Reference Coordinates:		
North Latitude: 41-10-55		
West Longitude: 104-04-07		
RADD	ADD 239C3	Gering NE 98.56 14.8 99.0 -0.44
KFMD	LIC 239C	Denver CO 175.63 216.7 176.0 -0.37
KFMD.A	APP 239C	Denver CO 175.63 216.7 176.0 -0.37
KGLL	LIC 241C1	Greeley CO 79.33 239.6 76.0 3.33
KGLL.C	CP 241C1	Greeley CO 86.59 245.5 76.0 10.59
ALLO	VAC 237C1	Eckley CO 162.58 127.2 144.0 18.58
KCGY	LIC 236C	Laramie WY 125.76 286.1 96.0 29.76
KWYY	LIC 238C	Casper WY 271.32 316.2 237.0 34.32
KWYY	LIC 238C	Casper WY 271.32 316.2 237.0 34.32
KSDZ	LIC 238C1	Gordon NE 246.34 35.4 211.0 35.34
-----		



**New Allotment  
Channel 238C3  
Pine Bluffs, WY  
70 and 60 dBu  
Contours and  
KSIR Gray Area  
Created**



**Exhibit E, Figure 10**



Ste

**Engineering Statement  
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KKDD-FM Broadcasters, LLC**

**Allocation Study – Ch 240A Arriba, CO (AD 240A)**  
[Depicting no spectrum changes required to allot Ch 240A]  
(Using the community of Arriba, CO reference coordinates as reference)

REFERENCE			CLASS = A			DISPLAY DATES	
39 17 09 N			Current	Spacings		DATA	03-03-01
103 16 30 W			Channel 240 - 95.9 MHz		SEARCH		03-17-01
Call	Channel	Location	Dist	Azi	FCC	Margin	
RADD	ADD 240A	Arriba	CO 0.00	0.0	115.0	-115.00	
RADD	ADD 242A	Limon	CO 32.15	264.6	31.0	1.15	
KFMD	LIC 239C	Denver	CO 175.82	287.1	165.0	10.82	
KFMD.A	APP 239C	Denver	CO 175.82	287.1	165.0	10.82	
ALLO	VAC 237C1	Eckley	CO 113.99	35.9	75.0	38.99	
KMOM	LIC 241C2	Fountain	CO 149.89	246.8	106.0	43.89	
KMOM.C	CP 241C2	Fountain	CO 149.89	246.8	106.0	43.89	



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**Instant Counterproposal Cumulative Gain/Loss Study**

<u>Call</u>	<u>City, State</u>	<u>Gain Area (km<sup>2</sup>)</u>	<u>Loss Area (km<sup>2</sup>)</u>	<u>Population Gain</u>	<u>Population Loss</u>
KSIR	Bennett, CO	13,370	2,078	1,179,660	12,033
KNKN	Pueblo, CO	4,268	1,753	5,605	58,184
AD238	Pine Bluffs, WY	4,803	-----	4,385	-----
<b>Totals:</b>		<b>22,441</b>	<b>3,831</b>	<b>1,189,650</b>	<b>70,217</b>

Net Area Gain (Loss): 18,610 km<sup>2</sup>

Net Population Gain (Loss): 1,119,433