

DOCKET FILE COPY ORIGINAL
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JAN 23 2002
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Amendment of Section 73.202(b), Table of
Allotments, FM Broadcast Stations
(Antlers, Oklahoma)

MM Docket: _____

RM: _____

TO: CHIEF, ALLOCATIONS BRANCH

PETITION FOR RULEMAKING

Keystone Broadcasting Corporation ("Keystone"), by and through its attorneys, hereby submits this "Petition for Rulemaking" requesting the modification of the allocation of Channel 272A at Antlers, Oklahoma. Specifically, Keystone is requesting the modification of the reference coordinates of Channel 272A so to eliminate severe short-spacing with Station KHKC-FM, Atoka, Oklahoma. Operation from the modified reference coordinates will continue to provide city-grade service to Antlers, and also will permit KHKC-FM to modify its facility to provide additional service in its community of license. Keystone respectfully submits that the public interest will be served by Commission approval of this Petition.

DISCUSSION

A. Station KHKC-FM Suffers From Extreme Short-Short Spacing Requirements.

At present, Station KHKC-FM operates on a directional basis with 3.3 kW effective radiated power. However, due to the directional nature of its operation, service to Atoka cannot be optimized. The attached Engineering Report by Cohen, Dippel and Everist, P.C., attached hereto as Exhibit A, notes that:

- (1) KHKC's antenna relative field towards its community of license is only 0.1 kW;
- (2) KHKC serves an area within its 60 dBu contour of 1,404 square kilometers; and

- (3) KHKC serves a population of 12,686 within its 60 dBu coverage contour.

Should the instant Petition, and the concurrently filed Modification Application to upgrade the facilities, be granted by the Commission:

- (1) KHKC's antenna relative field towards its community of license would increase 15 times the original value to 1.656 kW;
- (2) KHKC would serve an additional 778 square kilometers, an increase of 35%, within its 60 dBu coverage contour to 2182 square kilometers; and
- (3) KHKC would serve an additional 2,714 persons, an increase of 21.4%, to 15,400 persons within its 60 dBu contour.

As such, it is clear that the modification of Station KHKC would greatly increase its coverage to Atoka and the surrounding areas.

Keystone filed a minor modification application on January 11, 2002 specifying the modified facilities (BPH-20020111AAI), a copy of which is attached as Exhibit B hereto.¹ The application demonstrates that the modification of the reference coordinates of Channel 272A at Antlers is the sole impediment to this substantial increase in service to Keystone's community of license. The Commission has continuously reiterated an interest in maximizing broadcast facilities to better serve the public interest.² The instant Petition and the Modification Application clearly support this goal.

B. The Modification of the Antlers Allocation Would Serve The Public Interest

The leading cause for the severe directionalization of Station KHKC is the vacant allotment at Antlers on Channel 272A. This allotment has remained vacant for more than 10 years. Originally, the allotment was on Channel 281A. However, in subsequent rulemakings, Channel

¹ Keystone will construct and operate the modified KHKC facility upon approval of this Petition and the pending application.

² See Ironton and Salem, Missouri, 14 FCC Rcd 9240, R 4 (1999)(modifying allocation of two allotments to provide for expanded service); See also Pauls Valley, Oklahoma, *et al.* 13 FCC Rcd 13458, ¶ 7 (1998) (modifying allotment is "in the public interest since it will enable the station to... increase the number of people it serves."); See also Parris Island and Hampton, South Carolina, 12 FCC Rcd 17331, ¶ 5 (1997)("We believe the public interest would be served... since [the re-allocation] will enable [the Station] to expand its coverage area and improve its service.").

284A was substituted in 1992, and then Channel 272A was substituted in 2000.³ According to the FCC records, no application was filed with the Commission for either Channels 281, 284, or 272. While Channel 272A is scheduled to be auctioned in the Broadcast Auction #37, the auction has been postponed indefinitely.⁴ Moreover, the Commission allocated Channel 222C2 at Antlers in 1998,⁵ and is currently entertaining proposals for additional allotments on Channel 284A and 262A at Antlers.⁶ Finally, the modified reference coordinates would provide new 60 dBu service to both Hugo, Oklahoma (pop. 5,978) and Fort Towson, Oklahoma (pop. 568), that would not otherwise be available from the current reference coordinates.

Thus, while the Commission has a general policy against initiating a rulemaking proceeding solely for the modification of an allocation's reference coordinates,⁷ the instant request would not harm the Commission's laudable goal of protecting the integrity of the FM Table of Allotments. Instead, the instant Petition, along with the Modification Application, actually would support this goal by eliminating the substantial short-spacing between KHKC and Channel 272A at Antlers.

Moreover, the fact that Auction 37 is postponed indefinitely, along with the existence of the more desirous C2 allotment at Antlers and pending proposals for Channel 262A and 284A, the effect of this minor modification, solely to change the reference coordinates for Channel 272, on any "prospective applicant...[that]...may be in the process of obtaining specific site locations" is negligible, if any.⁸ Further, as evident from attached Exhibit 4E of Exhibit A, the new reference coordinates permit inclusion of added communities in the service area. Petitioner's engineer

³ See Wilburton and Antlers, Oklahoma, 7 FCC Rcd 1968 (1992); See Cross Plains, Texas, et al., 15 FCC Rcd 5506 (2000).

⁴ See Public Notice, DA 01-2148 (rel. Sept. 14, 2001).

⁵ See Detroit, Texas, et al., 13 FCC Rcd 15591 (1998).

⁶ See Petition for Rulemaking, RM-10249 (filed Aug. 22, 2001 by Charles Crawford); See Petition For Rulemaking, RMDD-13 (filed July 10, 2001 by Maurice Salsa).

⁷ See Granada, Artisia & Oklahoma, Mississippi, 7 FCC Rcd 4838, ¶ 5 (1992).

⁸ See Fair Bluff, North Carolina, 10 FCC Rcd 9255, ¶ 4 (1995), *aff'd sub. nom.* 11 FCC Rcd 12662 (1996).

estimates that more than 6,500 additional persons would receive service from the modified Antlers allocation providing another public interest basis for the proposed change.

III. CONCLUSION

The proposed modification is in the public interest, as it will eliminate short-spacing between KHKC-FM and Channel 272A, and permit Station KHKC-FM to upgrade its facilities. Additionally, the modification of the reference coordinates will cause no harm to third parties, since Broadcast Auction #37 remains postponed indefinitely and improves the Antlers allotment. Moreover, as demonstrated in the Engineering Exhibit and Modification Application attached hereto, the proposed modification greatly increases the coverage area and population served by Station KHKC-FM, and improves service to Atoka, the community of license. The public interest will be served by approval of the proposal set forth in this Petition.

Therefore, Keystone Broadcasting Corporation respectfully requests that the allocation of Channel 272A at Antlers, Oklahoma be modified to provide new reference coordinates.

Respectfully submitted,

**KEYSTONE BROADCASTING
CORPORATION**

By: 
M. Scott Johnson
Gardner, Carton & Douglas
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Suite 900, East Tower
Washington, DC 20005-3317
(202) 408-7122 - Telephone
(202) 289-1504 - Telecopier

Its Attorney

January 23, 2002

CERTIFICATION OF
KEYSTONE BROADCASTING CORPORATION

I, Robert S. Sullins, the President of Keystone Broadcasting Company, do hereby affirm and attest that I have reviewed the foregoing Petition for Rulemaking, and the supporting Engineering Exhibit prepared by Cohen, Dippell and Everist, P.C., and that, to my knowledge, the facts contained therein are true and correct.

KEYSTONE BROADCASTING COMPANY

By: Robert S. Sullins
Robert S. Sullins
Its President

January 23, 2002

EXHIBIT A

ENGINEERING STATEMENT
ON BEHALF OF
ROBERT S. SULLINS
RE PROPOSED RULE MAKING TO AMEND REFERENCE
COORDINATES OF UNUSED FM ALLOTMENT
FCC RULE 73.202(b)
CHANNEL 272A, ANTLERS, OKLAHOMA

JANUARY 2002

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

Introduction

This engineering report has been prepared on behalf of Keystone Broadcasting Corporation, licensee of radio station KHKC-FM, Channel 271A (102.1 MHz), Atoka, Oklahoma, in support of his request for a proposed rule making (PRM) to modify the reference coordinates of the unused Channel 272A (102.3 MHz) allotment of Antlers, Oklahoma in Section 73.202(b) of the FCC Rules. The present NAD-27 reference coordinates of Antlers (N 34°18'05", W 95°33'06") are short-spaced to KHKC-FM which results in a very restrictive directional antenna pattern for KHKC-FM.

An application to relax KHKC-FM's restrictive directional pattern across its community of license from 0.178 field (0.105 kW ERP) to 0.700 (1.656 kW ERP) in being filed concurrently with this PRM request. This 15 times increase in ERP will increase the 60 dBu coverage area from 1404 sq. km to 2182 sq. km with an increase in population served from 12,686 to 15,400 based on the 2000 Census of population. See Exhibit E-3.

Fully-Spaced Allotment Site

The proposed fully-spaced Channel 272A, Antlers, Oklahoma, allotment site coordinates (NAD-27) are as follows:

North Latitude: 34° 14' 40"

West Longitude: 95° 26' 28"

Exhibits E-1 and E-1A are 7.5 minute USGS topographical maps depicting the Channel 272A allotment site.

Exhibit E-2 is a City Grade coverage map which demonstrates that 70 dBu service completely encompasses the Antlers, Oklahoma, city limits using facilities of 6 kW/100 meters from the fully-spaced allotment site.

COHEN, DIPPELL AND EVERIST, P.C.

The allocation situation from the allotment site in Table I shows that the site is in full compliance with Section 73.207 of the FCC Rules and Regulations.

The reference site is rural and complies with the Commission's environmental requirements, and would be suitable for tower construction. See Exhibit E-4.

60 dBu (1 mV/m) Coverage

Based on maximum Class A FM facilities of 6 kW/100 meters, the predicted 60 dBu contour from the fully-spaced Antlers Channel 272A allotment encompasses a population of 18,987 (2000 Census) with an area of 2,544 sq. km, compared to a population of 11,621 within an area of 2,526 sq. km from the current allotment site.

Topographic Data

The terrain data between 3 to 16 kilometers from the eight radials (each 45 degrees of azimuth starting with true north) and the radial through Antlers, Oklahoma, were obtained from the NGDC 3-second data base.

Contour Data

The distances along these radials to the limits of the 3.16 mV/m (70 dBu) contour was determined from reference to Figure 1, Section 73.333 of the Rules and are shown on the attached Table II. The 3.16 mV/m contour is shown on an attached map (Exhibit E-2).

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
ALLOCATION SITUATION
FOR THE PROPOSED CHANNEL 272A
FULLY-SPACED ALLOTMENT SITE AT
ANTLERS, OKLAHOMA
JANUARY 2002

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Geographic Coordinates NAD-27</u>	<u>Separation</u>	
				<u>Actual km</u>	<u>Required km</u>
272A	Vacant	Antlers, OK	34°14'40" 95°26'28"	—	—
269C	None within 120 km			—	95
270C2	KBUS	Paris, TX	33°45'04" 95°24'51"	54.8	55
271A	KHKC-FM	Atoka, OK	34°25'08" 96°11'24"	71.6	72
271C3	KENA-FM CP mod.	Mena, AR	34°32'42" 94°18'21"	109.6	89
272C2	KRTQ	Sand Springs, OK	36°12'39" 96°06'03"	226.3	166
273C2	KMAD-FM	Whitesboro, TX	33°41'31" 96°26'36"	111.1	106
274C	None within 120 km			—	95
275A	KQIB	Idabel, OK	33°59'57" 94°47'29"	65.8	31
218C	None within 60 km				
219C	None within 60 km				

COHEN, DIPPELL AND EVERIST, P.C.

TABLE II
COMPUTED CITY COVERAGE CONTOUR
FOR THE CHANNEL 272A
ANTLERS, OKLAHOMA
JANUARY 2002

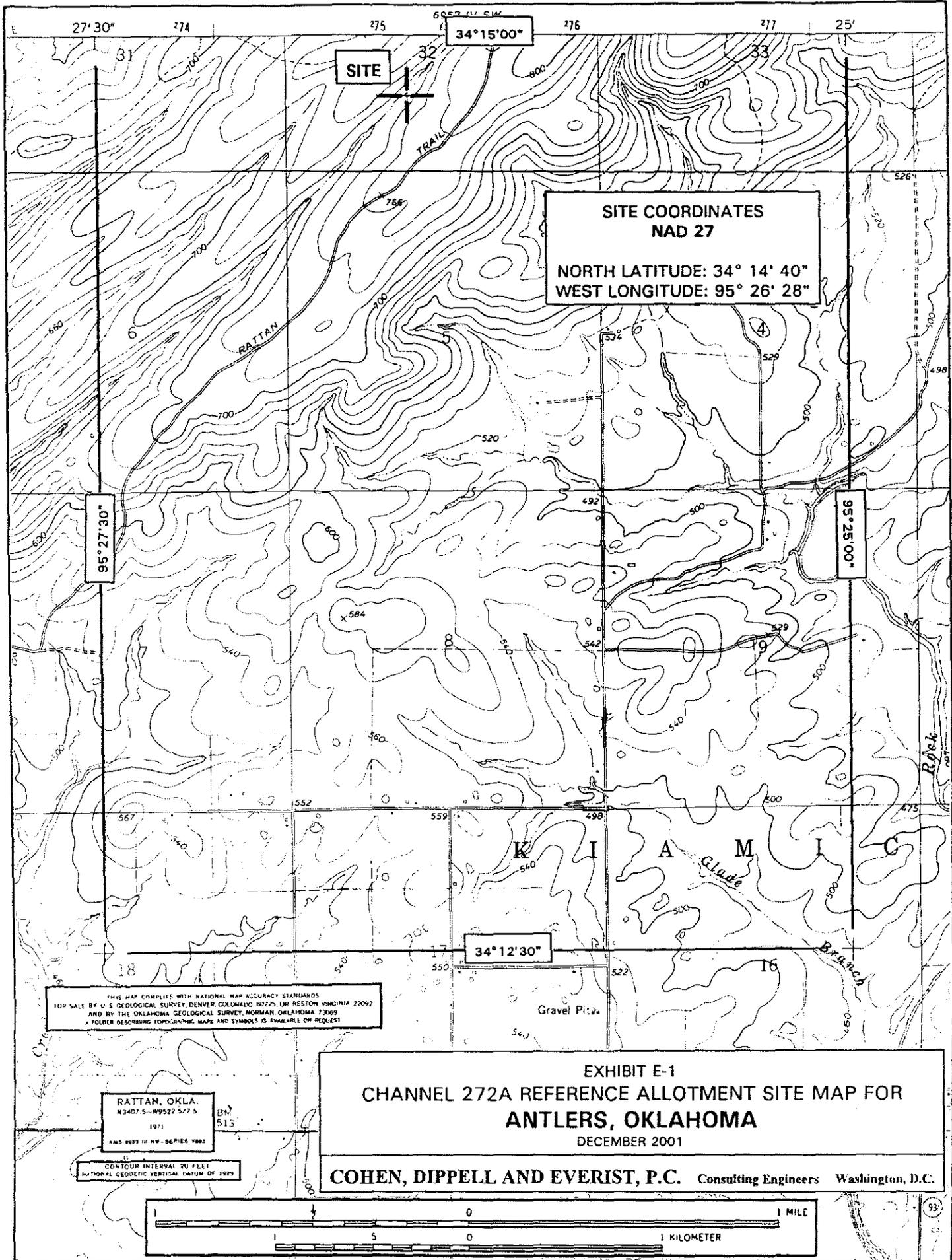
<u>Radial</u> <u>Bearing</u> N ° E, T	<u>Average*</u> <u>Elevation</u> <u>3 to 16 km</u> meters	<u>Distance to Contour</u> <u>3.16 mV/m</u> km
0	82	14.4
45	24	9.0
90	78	14.1
135	125	18.3
180	146	19.8
225	116	17.6
270	125	18.2
315	104	16.6
265	119	17.8

*Terrain data obtained from NGDC 3-second data base.

Channel 272A (102.3 MHz)
Effective Radiated Power 6 kW (7.78 dBk)
Average Elevation 3 to 16 km 178.2 meters AMSL
Center of Radiation 278.2 meters AMSL
Antenna Height Above Average Terrain 100 meters

NAD-27

North Latitude: 34° 14' 40"
West Longitude: 95° 26' 28"



6952 IV SW
34° 15' 00"

SITE

**SITE COORDINATES
NAD 27**
NORTH LATITUDE: 34° 14' 40"
WEST LONGITUDE: 95° 26' 28"

95° 27' 30"

95° 25' 00"

34° 12' 30"

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092 AND BY THE OKLAHOMA GEOLOGICAL SURVEY, NORMAN, OKLAHOMA 73069. A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST.

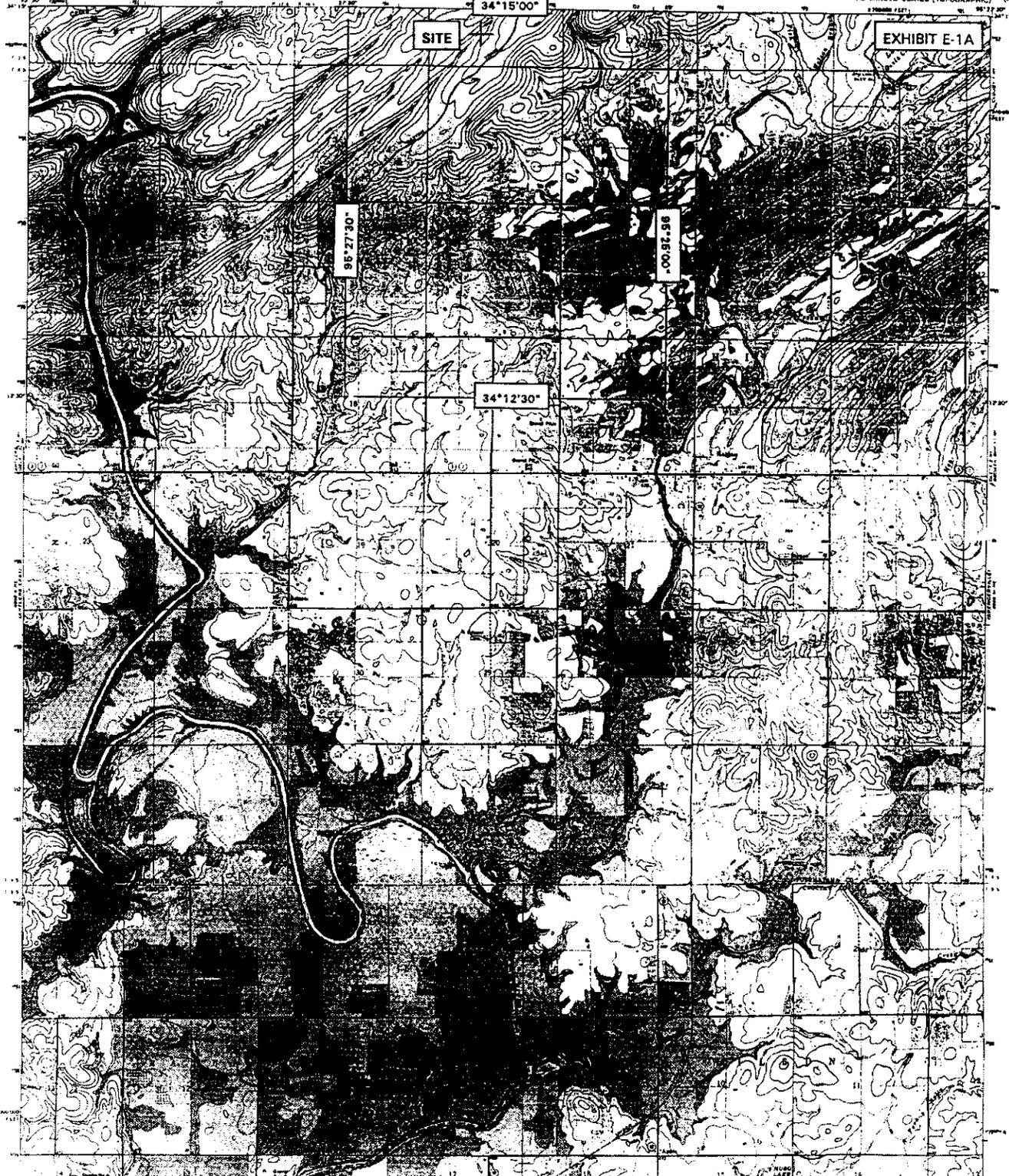
RATTAN, OKLA.
N3407.5-W9522.5/7.5
1971
AND 9037 OF NW-SERIES 7803

CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

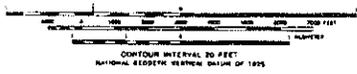
EXHIBIT E-1
CHANNEL 272A REFERENCE ALLOTMENT SITE MAP FOR
ANTLERS, OKLAHOMA
DECEMBER 2001

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.





Maplet, 65-162, and 65-163, submitted by the Geological Survey
in cooperation with the Oklahoma Highway Dept., the
Oklahoma Water Resources Board, and Oklahoma State Soil
Conservation Board.
Compiled by USGS and USMC, 1965.
Topography by leveling and aneroid methods from 1910
to 1965 (see 1:62,500 1970). Fuel checked 1971.
Photographic reduction: 1977 Photo America Station
C-10, Elmore, Oklahoma. Original contour interval, 20 feet.
1:62,500 contour interval. 1:62,500 contour interval.
1:62,500 contour interval. 1:62,500 contour interval.
Black contouring reduction done by the Oklahoma State Soil
Conservation Board.
This maplet is based on contouring from the original
1:62,500 map. The original map is available in microfiche
format on the microfiche North. See page 10 of this maplet.



ROAD CLASSIFICATION

Primary Highway	Light duty road, for C. & H.
Secondary Highway	Improved surface
Highway	Unimproved surface
Trail	Unimproved surface
Trail	Unimproved surface
Trail	Unimproved surface

THIS MAP CONFORMS WITH NATIONAL MAP ACCURACY STANDARDS
FOR MAPS BY U. S. GEOLOGICAL SURVEY, DENVER COLORADO 80275, OF RESOLUTION 1:62,500
AND BY THE OKLAHOMA GEOLOGICAL SURVEY, NORMAN, OKLAHOMA 73069.
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST.

RATTAN, OKLA
R41075-6-1965:2 1:62,500
1971

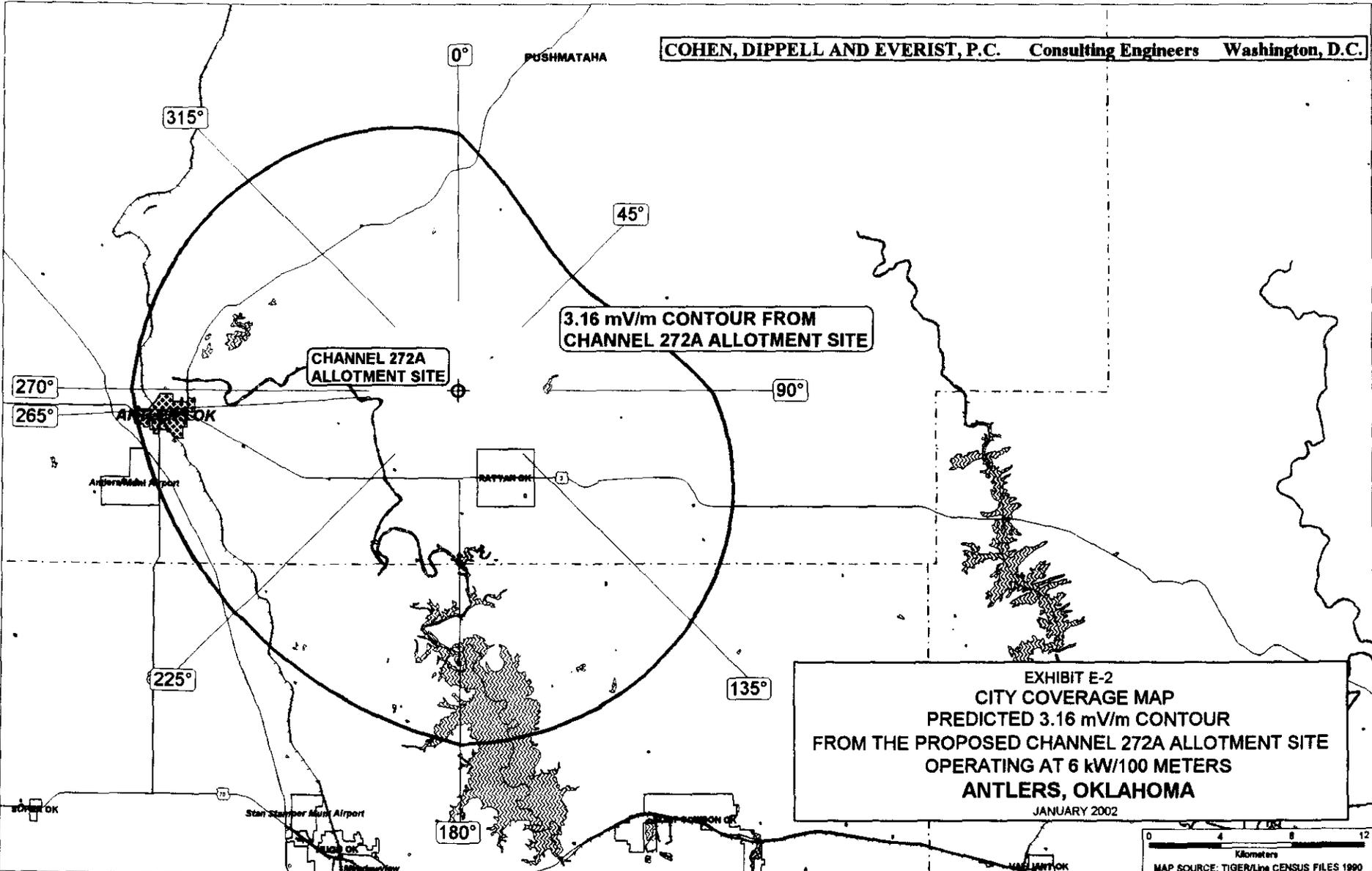


EXHIBIT E-2
CITY COVERAGE MAP
PREDICTED 3.16 mV/m CONTOUR
FROM THE PROPOSED CHANNEL 272A ALLOTMENT SITE
OPERATING AT 6 kW/100 METERS
ANTLERS, OKLAHOMA
JANUARY 2002

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

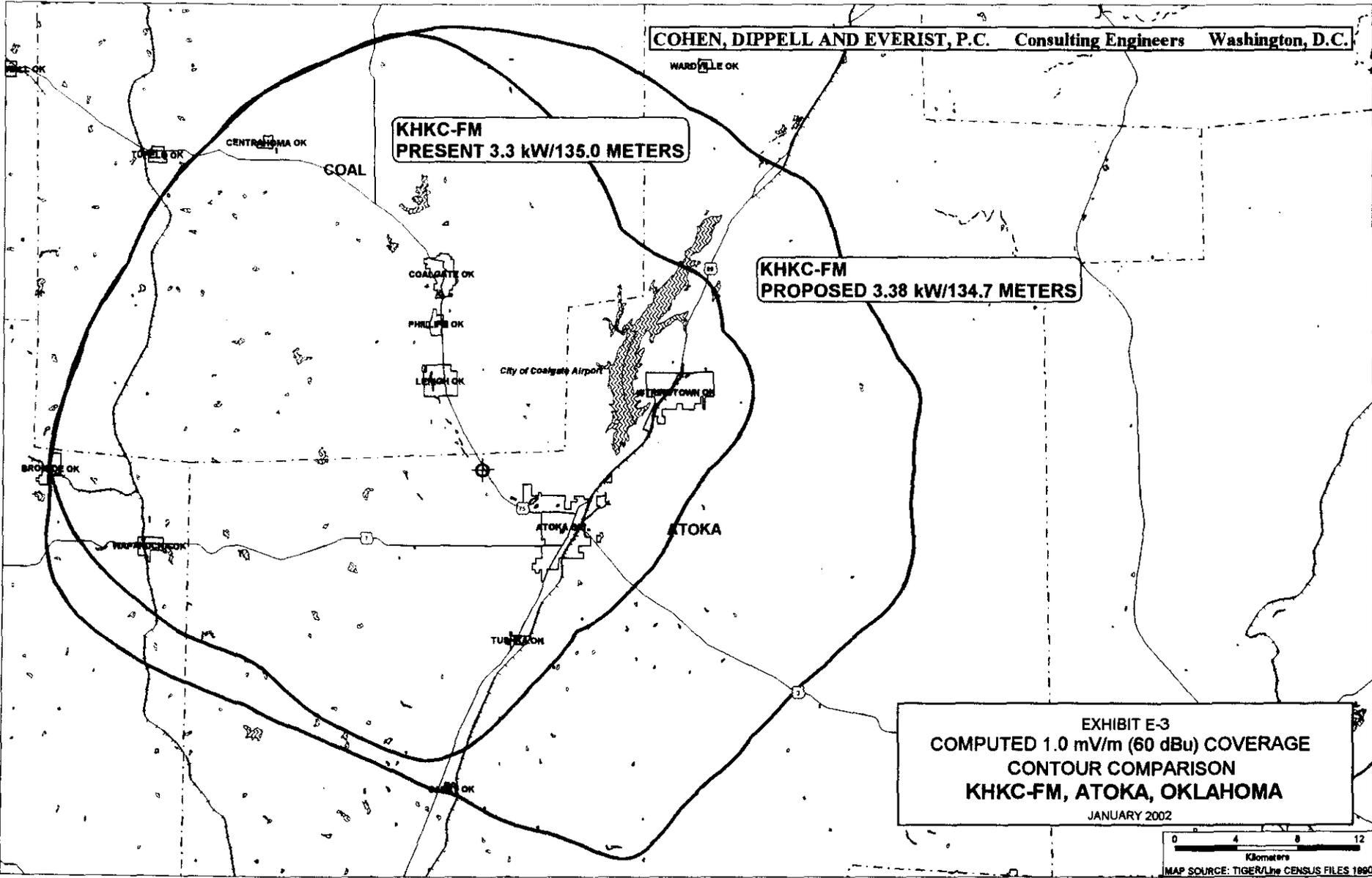
WARDVILLE OK

**KHKC-FM
PRESENT 3.3 kW/135.0 METERS**

**KHKC-FM
PROPOSED 3.38 kW/134.7 METERS**

EXHIBIT E-3
COMPUTED 1.0 mV/m (60 dBu) COVERAGE
CONTOUR COMPARISON
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002

0 4 8 12
Kilometers
MAP SOURCE: TIGER/Line CENSUS FILES 1990



COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

FCC REFERENCE SITE
N 34° 18' 05"W 95° 33' 06"

PROPOSED SITE
N 34° 14' 40" W 95° 26' 28"

EXHIBIT E-4
COMPUTED 1.0 mV/m (60 dBu)
COVERAGE CONTOUR COMPARISON
AT 6 KW/100 METERS AT
ANTLERS CHANNEL 272A ALLOTMENT
JANUARY 2002

0 5 10 15
Kilometers
MAP SOURCE: TIGER/Line CENSUS FILES 1990

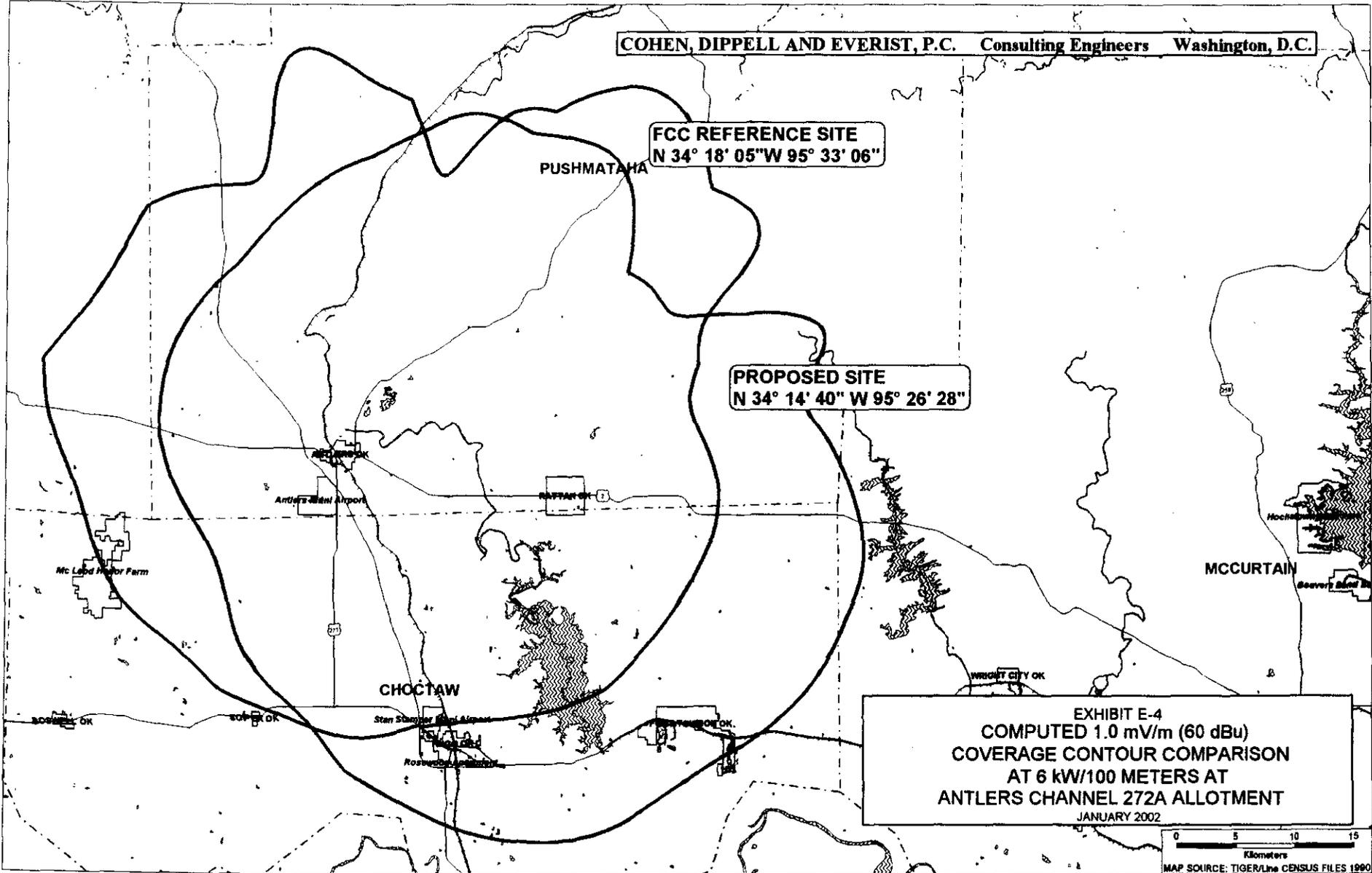


EXHIBIT B

Federal Communications Commission Washington, D.C. 20554 <p style="text-align: center;">FCC 301</p>	Approved by OMB 3060-0027 (March 2001)	FOR FCC USE ONLY
APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION		FOR COMMISSION USE ONLY FILE NO. BPH - 20020111AAI
Read INSTRUCTIONS Before Filling Out Form		

Section 1 - General Information

1. Legal Name of the Applicant KEYSTONE BROADCASTING CORPORATION		
Mailing Address 1913 WEST ELM STREET		
City DURANT	State or Country (if foreign address) OK	ZIP Code 74701 -
Telephone Number (include area code) 5809243100	E-Mail Address (if available)	
	Call Sign KHKC-FM	Facility ID Number 3652

2. Contact Representative (if other than applicant) M. SCOTT JOHNSON, ESQUIRE		Firm or Company Name GARDNER, CARTON & DOUGLAS
Mailing Address 1301 K STREET, N.W. SUITE 900 - EAST TOWER		
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20005 -
Telephone Number (include area code) 2024087122	E-Mail Address (if available) SJOHNSON@DC.GCD.COM	

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Other
--

4. Application Purpose	
<input type="radio"/> New station <input type="radio"/> Major Change in licensed facility <input checked="" type="radio"/> Minor Change in licensed facility	<input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application <input type="radio"/> Minor Amendment to pending application
(a) File number of original construction permit:	<input checked="" type="checkbox"/> NA
(b) Service Type:	<input type="radio"/> AM <input checked="" type="radio"/> FM <input type="radio"/> TV <input type="radio"/> DTV
(c) Community of License: City: ATOKA State: OK	
(d) Facility Type	<input checked="" type="radio"/> Main <input type="radio"/> Auxiliary
If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised.	
	[Exhibit 1]

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1.	<p>Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No										
2.	<p>Parties to the Application.</p> <p>a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.</p> </div> <div style="width: 45%;"> <p>(2) Citizenship.</p> <p>(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standatd, etc.</p> <p>(4) Percentage of votes.</p> <p>(5) Percentage of total assets (equity plus debt).</p> </div> </div> <p>[Enter Parties/Owners Information]</p> <div style="text-align: center; margin: 10px 0;"> <p>Parties to the Application</p> <p>List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>(1) Name and address of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address, and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.</p> </div> <div style="width: 45%;"> <p>(2) Citizenship.</p> <p>(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.</p> <p>(4) Percentage of votes.</p> <p>(5) Percentage of equity.</p> </div> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 45%;">(1) Name and Address</th> <th style="width: 15%;">(2) Citizenship</th> <th style="width: 15%;">(3) Positional Interest</th> <th style="width: 10%;">(4) Percentage of Votes</th> <th style="width: 15%;">(5) Percentage of Equity</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NOT REQUIRED</td> <td style="text-align: center;">US</td> <td style="text-align: center;">NOT REQUIRED</td> <td></td> <td></td> </tr> </tbody> </table> </div>		(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Equity	NOT REQUIRED	US	NOT REQUIRED		
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Equity								
NOT REQUIRED	US	NOT REQUIRED										

4.	<p>Multiple Ownership.</p> <p>a. Applicant certifies that the proposed facility:</p> <ol style="list-style-type: none"> 1. complies with the Commission's multiple and cross-ownership rules; 2. does not present an issue under the Commission's policies relating to media interests of immediate family members; 3. complies with the Commission's policies relating to future ownership interests; and 4. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors. <p>b. Radio Applicants Only. If the grant of the application would result in certain principal community service contour overlaps, see Local Radio Ownership Worksheet, Question 1, applicant certifies that all relevant information has been placed in public inspection file(s) and submitted to the Commission.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 4]</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 5]</p>
5.	<p>Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <ol style="list-style-type: none"> a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised. 	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]</p>
6.	<p>Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]</p>
7.	<p>Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]</p>
8.	<p>Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
9.	<p>Local Public Notice. Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
10.	<p>Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p> <p>An exhibit is required unless this question is inapplicable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 9]</p>
11.	<p>Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
12.	<p>Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing ROBERT S. SULLINS	Typed or Printed Title of Person Signing ROBERT S. SULLINS
Signature	Date 12/15/2001

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Section III-B - FM Engineering		
TECHNICAL SPECIFICATIONS		
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.		
TECH BOX		
1.	Channel Number: 271	
2.	Class (select one): <input checked="" type="radio"/> A <input type="radio"/> B1 <input type="radio"/> B <input type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C <input type="radio"/> D	
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 34 Minutes 25 Seconds 8 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 96 Minutes 11 Seconds 24 <input checked="" type="radio"/> West <input type="radio"/> East	
4.	One Step Proposal Allotment Coordinates: (NAD 27) <input checked="" type="checkbox"/> Not Applicable Latitude: Degrees Minutes Seconds <input type="radio"/> North <input type="radio"/> South Longitude: Degrees Minutes Seconds <input type="radio"/> West <input type="radio"/> East	
5.	Antenna Structure Registration Number: 1010436 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA	
6.	Overall Tower Height Above Ground Level:	138.5meters
7.	Height of Radiation Center Above Mean Sea Level:	323 meters(H) 323 meters(V)
8.	Height of Radiation Center Above Ground Level:	134.6meters(H) 134.6meters(V)
9.	Height of Radiation Center Above Average Terrain:	134.7meters(H) 134.7meters(V)
10.	Effective Radiated Power:	3.38 kW(H) 3.38 kW(V)
11.	Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable (Beam-Tilt Antenna ONLY)	kW(H) kW(V)
12.	Directional Antenna Relative Field Values: <input type="checkbox"/> Not applicable (Nondirectional) Rotation (Degrees): 0 <input type="checkbox"/> No Rotation	

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	1	10	1	20	1	30	1	40	1	50	1
60	1	70	1	80	1	90	1	100	1	110	0.83
120	0.72	130	0.7	140	0.72	150	0.78	160	0.876	170	0.696
180	0.56	190	0.515	200	0.475	210	0.48	220	0.515	230	0.585
240	0.737	250	0.927	260	1	270	1	280	1	290	1
300	1	310	1	320	1	330	1	340	1	350	1
Additional Azimuths		123	0.707	135	0.7	225	0.525				

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

13.	Allotment. The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 21]
14.	Community Coverage. The proposed facility complies with 47 C.F.R. Section 73.315.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 22]
15.	Main Studio Location. The proposed main studio location complies with 47 C.F.R. Section 73.1125.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 23]
16.	Interference. The proposed facility complies with all of the following applicable rule sections: Check all those that apply: Separation Requirements. <input type="checkbox"/> a) 47 C.F.R. Section 73.207 Grandfathered Short-Spaced. <input type="checkbox"/> b) 47 C.F.R. Section 73.213(a) with respect to station(s): [Exhibit 25] Exhibit required <input type="checkbox"/> c) 47 C.F.R. Section 73.213(b) with respect to station(s): [Exhibit 26] Exhibit required <input type="checkbox"/> d) 47 C.F.R. Section 73.213(c) with respect to station(s): [Exhibit 27] Exhibit required. Contour Protection <input checked="" type="checkbox"/> e) 47 C.F.R. Section 73.215 with respect to station(s): [Exhibit 28] Exhibit required.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 24]

17	<p>Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required.</p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 29]</p>
<p>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</p>		

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name WARREN M. POWIS	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 12/15/2001	
Mailing Address 1300 L STREET, N.W. SUITE 1100		
City WASHINGTON	State or Country (if foreign address) DC	Zip Code 20005 -
Telephone Number (include area code) 2028980111	E-Mail Address (if available) CDE@ATTGLOBAL.NET	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 3

Description: OTHER AUTHORIZATIONS

ROBERT S. SULLINS IS THE OWNER OF KEOR (AM).

Attachment 3

Exhibit 28

Description: EXHIBIT 28

PLEASE SEE ATTACHED ENGINEERING EXHIBIT.

Attachment 28

Description	Type
Engineer's Report in Support of KHKC-FM Minor Modification Application	Adobe Acrobat File

ENGINEERING REPORT
RE MINOR CHANGE APPLICATION
KHKC-FM, ATOKA, OKLAHOMA
CH. 271A (102.1 MHZ) 3.38 KW (H&V) 134.7 M HAAT

JANUARY 2002

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P C.

City of Washington)
) ss
District of Columbia)

Warren M. Powis, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the University of Canterbury, New Zealand, a Registered Professional Engineer in the District of Columbia, the State of Virginia, the State of South Carolina, and Vice President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005; previously employed for 15 years with the New Zealand Broadcasting Corporation; a member of the Institution of Professional Engineers New Zealand (IPENZ), the Association of Federal Communications Consulting Engineers (AFCCE), and the National Society of Professional Engineers (NSPE).

That his qualifications are a matter of record in the Federal Communications Commission;

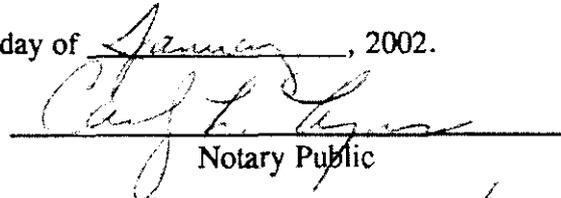
That the attached engineering report was prepared by him or under his supervision and direction and,

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Warren M. Powis
District of Columbia
Professional Engineer
Registration No. 8339

Subscribed and sworn to before me this 11th day of January, 2002.


Notary Public

My Commission Expires: 2/28/2003

Introduction

This engineering report has been prepared on behalf of Keystone Broadcasting Corporation in support of his minor change application to relax directional antenna constraints of KHKC-FM. The FM operation is proposed on Channel 271A (102.1 MHz) with 3.38 kW (H&V) (directional) effective radiated power (ERP) and 134.7 meters height above average terrain (HAAT) redetermined using the computerized 3-second NGDC data base.

The proposed operation has been designed for mutual protection with KDGE(FM), Channel 271C, Fort Worth-Dallas, Texas (FCC File No. BLH-19910508KB) and to KBUS(FM), Channel 270C2, Paris, Texas (FCC File No. BLH-19881116KB). Therefore, the applicant requests processing of its application under Section 73.215 of the Commission's Rules. Since KHKC-FM is also short-spaced to the unused Channel 272A allotment at Antlers, Oklahoma, the applicant is concurrently filing a request for proposed rule making to amend the reference coordinates for the Antlers Channel 272A allotment.

Public Interest

This proposal will increase the antenna relative field across Atoka from 0.178 (0.105 kW ERP) to 0.700 (1.656 kW) and increase the 60 dBu coverage area from 1,404 to 2,182 sq. km with an associated 21.4% increase in population served from 12,686 to 15,400 (2000 Census).

In addition the predicted 60 dBu contour at 6 kW/100 meters above average terrain from the fully-spaced Antlers, Oklahoma, allotment will encompass an area of 2,544 sq. km and a population of 18,987 compared to an area of 2,526 sq. km and a population of 11,621 from the current allotment site. This represents a 63.4% increase in population served by the Antlers Channel 272A allotment.

Antenna Site

The proposed 2-bay, half-wavelength spaced FM antenna will be side-mounted on the existing KEOR(AM) tower. The proposed antenna is located at Hwy. 75, 4 miles northwest of Atoka located in both Coal and Atoka Counties, Oklahoma.

The geographic coordinates (NAD-27) of the proposed antenna site are as follows:

North Latitude: 34° 25' 08"

West Longitude: 96° 11' 24"

The following tabulation shows the pertinent data for the proposed installation.

Equipment Data

Transmitter:	Type-approved
Transmission Line:	450 feet (137.2 meters) Cablewave, Type HCC158-50 coaxial cable having an outer diameter of 1-5/8" or equivalent
Antenna:	ERI or equivalent 2-bay, half-wavelength spaced, circularly polarized

Power Data

Transmitter output power	3.206 kW
Transmission line efficiency	81.1%
Power input to antenna	2.60 kW
Antenna power gain (H&V) (assumed)	1.3
Effective Radiated Power (H&V)	3.38 kW

Elevation Data

Elevation of the site above mean sea level	188.4 meters
Elevation of the top of supporting structure above ground including lighting	138.5 meters
Elevation of the top of supporting structure above mean sea level including lighting	326.9 meters
Height of radiation center above ground (H&V)	134.6 meters
Height of radiation center above mean sea level (H&V)	323.0 meters
Height of radiation center above average terrain (H&V)	134.7 meters
Tower Registration No. 1010436	

Allocation Situation

The attached Table I shows the distances to the pertinent co-channel and adjacent channel stations and allotments from the proposed antenna site. As indicated, all distances comply with the minimum separation requirements listed under Section 73.207 of the Commission's Rules with the exception of that co-channel station KDGE, Fort Worth-Dallas, Texas, and to first-adjacent channel station KBUS, Paris, Texas. The proposed non-directional 3.38 kW operation at Atoka has been analyzed according to Section 73.215 of the Commission's Rules and meets the protection requirements to KDGE and KBUS (see Exhibit E-2).

Topographic Data

The average elevation data between 3 to 16 km used for the prediction of coverage and interfering contours is based on the NGDC computerized 3-second terrain data base.

Contour Data

The distances to the predicted 100 mV/m, 3.16 mV/m, 1.0 mV/m, 0.5 mV/m, and 0.1 mV/m contours were determined from Figure 1 and 1a, Section 73.333 of the Commission's Rules and are shown on the attached Tables II, III, IV, and V. The predicted coverage and interfering contours are shown on Exhibits E-1, E-2, and E-3.

Main Studio Location

The main studio is located inside the predicted 3.16 mV/m contour.

Other Radio Stations

The proposed FM antenna will be side-mounted on the existing KEOR(AM) guyed tower. There is one FM translator station, but no TV stations located within 10 km of the proposed FM site. There are no other AM broadcast stations located within 3.22 km of the proposed site.

In case of problem to any authorized non-broadcast facilities of radio receivers, the applicant will take the necessary remedial steps to resolve the intermodulation interference.

Blanketing Contour

The blanketing contour (115 dBu) based on an ERP of 3.38 kW will extend 0.72 km from the proposed site. The applicant will comply with all the pertinent requirements of Section 73.318 of the Commission's Rules.

Environmental Statement

According to the applicant, the antenna site is not located near any known wilderness area, wildlife preserve, historic place, or Indian religious site. The proposed facilities are not located in a flood plain area. The proposed facilities will not affect or jeopardize the threatened or endangered

species or their critical habitats. The existing guyed tower does not involve significant changes in the surface features.

The existing guyed tower is lighted and painted as required by the FAA. The proposed site is not located near any residential neighborhood.

The proposed facilities will not affect any districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF radiation as set forth in the OET Bulletin 65 (Edition 97-01). For a combined effective radiated power of 6.76 kW, a radiation center of 134.6 meters above ground, and a relative downward field of 0.6 at 30° depression angle, the proposed FM operation would have a maximum of 1.2 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RF radiation level at 2 meters above the base of the tower. The FCC standard for the FM band is 200 $\mu\text{W}/\text{cm}^2$ for an uncontrolled environment and 1000 $\mu\text{W}/\text{cm}^2$ for a controlled environment. The proposed antenna will replace the existing antenna which is located on the south tower of the KEOR, 5 kW, 1110 KHz, two-tower antenna array. The KEOR towers are precluded from public access by security fences and locked gates located at least two meters away from each tower.

Therefore, members of the public and personnel working around the proposed FM facility would not be exposed to RF radiation levels exceeding the FCC standards. With respect to work performed on the tower, the applicant will establish procedure to ensure that workers are not exposed to RF radiation levels above those prescribed by FCC, by reducing or turning off the power, as appropriate.

For the reasons stated above, the proposal does not involve any action specified in Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.

TABLE I
FM ALLOCATION SITUATION
FOR THE CHANNEL 271A OPERATION OF
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Geographic Coordinates NAD-27</u>	<u>Separation</u>	
				<u>Actual km</u>	<u>Required km</u>
271A	KHKC-FM	Atoka, OK	34°25'08" 96°11'24"	–	–
268C	None within 150 km			–	95
269C3	KZMP-FM	Denison- Sherman, TX	33°38'11" 96°41'57"	98.7	42
270C2	KBUS	Paris, TX	33°45'04" 95°24'51"	103.0 ¹	106
270C	KTST	Oklahoma City, OK	35°35'52" 97°29'22"	176.6	165
271C	KDGE	Fort Worth- Dallas, TX	32°34'54" 96°58'32"	216.5 ¹	226
272	Vacant Allot.	Antlers, OK	34°18'05" 95°33'06"	60.2 ²	72
273C3	KMAD-FM	Madill, OK	33°41'31" 96°26'36"	84.0	42
274C	None within 150 km			–	95
217C	None within 50 km			–	29
218C	None within 50 km			–	29

¹Equivalent contour protection provided in accordance with Section 73.215 of the FCC Rules.

²Refer concurrently filed proposed rule making to change Ch. 272A, Antlers, OK reference coordinates to fully-spaced site at N 34°14'40", W 95°26'28".

TABLE II
COMPUTED COVERAGE DATA
FOR THE PROPOSED FM OPERATION OF
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>Average*</u> <u>Elevation</u> <u>3 to 16 km</u> <u>meters</u>	<u>ERP</u> <u>kW</u>	<u>Predicted Distance to Contour</u>	
			<u>3.16 mV/m</u> <u>km</u>	<u>1.0 mV/m</u> <u>km</u>
0	139	3.38	16.5	28.6
45	127	3.38	15.7	27.6
90	132	3.38	16.0	28.0
135	139	1.66	13.7	24.5
180	139	1.06	12.3	22.1
225	142	0.93	12.0	21.7
270	133	3.38	16.1	28.1
315	127	3.38	15.7	27.6
123	145	1.69	14.1	25.0

*NGDC 30-second terrain data base.

**Radial through principal community not included in the calculation of HAAT.

Channel 271A (102.1 MHz)
 Effective Radiated Power 3.38 kW (5.29 dBk)
 Center of Radiation 323.0 meters AMSL
 Antenna Height Above Average Terrain 134.7 meters

NAD-27

North Latitude: 34° 25' 08"
 West Longitude: 96° 11' 24"

TABLE III
COMPUTED CONTOUR DATA
FOR THE PROPOSED FM OPERATION OF
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT</u> meters	<u>ERP</u> kW	<u>Predicted Distance to Contours</u>			
			<u>F(50,50)</u> <u>60 dBu</u> km	<u>F(50,10)</u> <u>100 dBu</u> km	<u>F(50,10)</u> <u>54 dBu</u> km	<u>F(50,10)</u> <u>40 dBu</u> km
0	139	3.38	28.6	2.6	43.6	84.0
5	136	3.38	28.4	2.6	43.3	83.6
10	134	3.38	28.2	2.6	43.0	83.3
15	133	3.38	28.2	2.6	42.9	83.2
20	129	3.38	27.8	2.6	42.3	82.5
25	125	3.38	27.4	2.5	41.9	82.0
30	120	3.38	27.0	2.5	41.1	81.1
35	123	3.38	27.2	2.5	41.5	81.6
40	120	3.38	27.0	2.5	41.1	81.1
45	127	3.38	27.6	2.6	42.0	82.2
50	133	3.38	28.2	2.6	42.9	83.2
55	128	3.38	27.7	2.6	42.3	82.5
60	119	3.38	26.9	2.5	41.1	81.0
65	121	3.38	27.1	2.5	41.3	81.3
70	126	3.38	27.5	2.5	42.0	82.1
75	130	3.38	27.9	2.6	42.5	82.7
80	140	3.38	28.8	2.6	43.7	84.2
85	134	3.38	28.2	2.6	43.0	83.3
90	132	3.38	28.0	2.6	42.7	83.0
95	130	3.38	27.9	2.6	42.5	82.8
100	136	3.38	28.4	2.6	43.3	83.7
105	146	2.92	28.4	2.6	43.0	83.0
110	153	2.33	27.5	2.4	41.6	80.7
115	150	1.95	26.2	2.3	39.6	77.8
120	148	1.75	25.5	2.2	38.4	76.0
125	144	1.66	24.8	2.1	37.4	74.6
130	141	1.66	24.6	2.1	37.0	74.1
135	140	1.66	24.5	2.1	36.9	73.9
140	139	1.75	24.8	2.1	37.3	74.6
145	137	1.85	24.9	2.2	37.6	75.1
150	136	2.06	25.4	2.2	38.4	76.4
155	135	2.47	26.4	2.4	40.0	78.8
160	136	2.59	26.8	2.4	40.6	79.7
165	134	2.06	25.3	2.2	38.2	76.2

TABLE III
COMPUTED CONTOUR DATA
FOR THE PROPOSED FM OPERATION OF
KHHC-FM, ATOKA, OKLAHOMA
JANUARY 2002
(continued)

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT</u> meters	<u>ERP</u> kW	<u>Predicted Distance to Contours</u>			
			<u>F(50,50)</u> <u>60 dBu</u> km	<u>F(50,10)</u> <u>100 dBu</u> km	<u>F(50,10)</u> <u>54 dBu</u> km	<u>F(50,10)</u> <u>40 dBu</u> km
170	133	1.64	23.9	2.1	36.0	72.7
175	138	1.30	23.1	1.9	34.5	70.2
180	139	1.06	22.1	1.8	32.9	67.7
185	133	0.97	21.2	1.7	31.3	65.5
190	135	0.90	20.9	1.7	30.9	64.7
195	134	0.83	20.5	1.6	30.2	63.6
200	137	0.76	20.3	1.6	29.9	63.0
205	137	0.76	20.3	1.6	30.0	63.0
210	136	0.78	20.4	1.6	30.0	63.1
215	137	0.83	20.7	1.6	30.6	64.1
220	139	0.90	21.2	1.7	31.4	65.4
225	142	0.93	21.7	1.7	32.1	66.5
230	141	1.16	22.7	1.9	33.8	69.1
235	141	1.45	23.9	2.0	35.9	72.3
240	142	1.84	25.3	2.2	38.1	75.7
245	142	2.31	26.6	2.3	40.3	79.0
250	142	2.90	27.9	2.5	42.4	82.2
255	140	3.38	28.7	2.6	43.7	84.2
260	139	3.38	28.7	2.6	43.6	84.1
265	133	3.38	28.2	2.6	42.9	83.2
270	133	3.38	28.1	2.6	42.8	83.1
275	131	3.38	27.9	2.6	42.6	82.8
280	125	3.38	27.5	2.5	41.9	82.0
285	121	3.38	27.1	2.5	41.3	81.3
290	121	3.38	27.1	2.5	41.3	81.3
295	118	3.38	26.8	2.5	40.8	80.8
300	116	3.38	26.6	2.5	40.6	80.6
305	121	3.38	27.0	2.5	41.2	81.2
310	124	3.38	27.3	2.5	41.7	81.8
315	127	3.38	27.6	2.6	42.1	82.3
320	127	3.38	27.6	2.6	42.1	82.3
325	133	3.38	28.1	2.6	42.8	83.1

TABLE III
COMPUTED CONTOUR DATA
FOR THE PROPOSED FM OPERATION OF
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002
 (continued)

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT</u> meters	<u>ERP</u> kW	<u>Predicted Distance to Contours</u>			
			<u>F(50,50)</u> <u>60 dBu</u> km	<u>F(50,10)</u> <u>100 dBu</u> km	<u>F(50,10)</u> <u>54 dBu</u> km	<u>F(50,10)</u> <u>40 dBu</u> km
330	135	3.38	28.3	2.6	43.2	83.5
335	136	3.38	28.4	2.6	43.2	83.6
340	136	3.38	28.4	2.6	43.2	83.6
345	139	3.38	28.6	2.6	43.6	84.0
350	140	3.38	28.7	2.6	43.7	84.2
355	141	3.38	28.8	2.7	43.8	84.3

*NGDC 3-second data base.

Channel 271A (102.1 MHz)
 Effective Radiated Power 3.38 kW (5.29 dBk)
 Center of Radiation 323.0 meters AMSL
 Antenna Height Above Average Terrain 134.7 meters

NAD-27

North Latitude: 34° 25' 08"
 West Longitude: 96° 11' 24"

TABLE IV
COMPUTED CONTOUR DATA
KDGE, FORTH WORTH-DALLAS, TEXAS
CHANNEL 271C, 100 KW, 600 METERS
JANUARY 2002

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 40 dBu 0.1 mV/m km	<u>F(50,50)</u> 60 dBu 1.0 mV/m km
0	631	199.8	93.0
5	626	199.4	92.8
10	609	198.3	92.1
15	598	197.6	91.7
20	577	196.1	90.9
25	572	195.8	90.7
30	575	196.1	90.8
35	577	196.2	90.9
40	582	196.5	91.1
45	586	196.8	91.3
50	589	197.0	91.4
55	589	197.0	91.4
60	588	196.9	91.4
65	588	196.9	91.3
70	591	197.1	91.5
75	593	197.2	91.5
80	592	197.2	91.5
85	585	196.7	91.2
90	580	196.4	91.0
95	575	196.0	90.8
100	579	196.3	91.0
105	577	196.2	90.9
110	582	196.5	91.1
115	586	196.8	91.2
120	590	197.0	91.4
125	593	197.3	91.5
130	592	197.2	91.5
135	580	196.4	91.0
140	572	195.8	90.7
145	565	195.4	90.4
150	564	195.3	90.3
155	566	195.4	90.4
160	575	196.1	90.8

TABLE IV
COMPUTED CONTOUR DATA
KDGE, FORTH WORTH-DALLAS, TEXAS
CHANNEL 271C, 100 KW, 600 METERS
JANUARY 2002
 (continued)

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 40 dBu <u>0.1 mV/m</u> km	<u>F(50,50)</u> 60 dBu <u>1.0 mV/m</u> km
165	570	195.7	90.6
170	565	195.3	90.4
175	561	195.1	90.2
180	558	194.8	90.0
185	555	194.6	89.9
190	555	194.6	89.9
195	566	195.4	90.4
200	582	196.5	91.1
205	591	197.1	91.5
210	598	197.6	91.7
215	601	197.8	91.8
220	605	198.1	92.0
225	609	198.3	92.1
230	616	198.8	92.4
235	615	198.7	92.4
240	613	198.6	92.3
245	611	198.4	92.2
250	609	198.3	92.1
255	615	198.7	92.4
260	611	198.5	92.2
265	614	198.7	92.3
270	618	198.9	92.5
275	616	198.8	92.4
280	612	198.5	92.3
285	611	198.5	92.2
290	615	198.7	92.4
295	616	198.8	92.4
300	619	199.0	92.5
305	622	199.2	92.6
310	624	199.3	92.7
315	625	199.4	92.7
320	624	199.3	92.7

TABLE IV
COMPUTED CONTOUR DATA
KDGE, FORTH WORTH-DALLAS, TEXAS
CHANNEL 271C, 100 KW, 600 METERS
JANUARY 2002
 (continued)

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 40 dBu <u>0.1 mV/m</u> km	<u>F(50,50)</u> 60 dBu <u>1.0 mV/m</u> km
325	625	199.4	92.7
330	625	199.4	92.8
335	629	199.6	92.9
340	631	199.8	93.0
345	633	199.9	93.0
350	634	199.9	93.1
355	632	199.8	93.0

Channel 271C (102.1 MHz)
 Effective Radiated Power 100 kW (20 dBk)**
 Center of Radiation 792 meters AMSL**
 Assumed Antenna Height Above Average Terrain 600 meters*

NAD-27

North Latitude: 32° 34' 54"
 West Longitude: 96° 58' 32"

*NGDC 3-second data base

**Presumed use of maximum ERP and AHAAT for a Class C FM operation.

TABLE V
COMPUTED CONTOUR DATA
KBUS, PARIS, TEXAS
CHANNEL 270C2, 50 KW, 150 METERS
JANUARY 2002

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 54 dBu <u>0.5 mV/m</u> km	<u>F(50,50)</u> 60 dBu <u>1.0 mV/m</u> km
0	164	80.1	53.9
5	166	80.3	54.1
10	166	80.4	54.2
15	167	80.5	54.2
20	164	80.2	54.0
25	162	79.9	53.7
30	161	79.6	53.5
35	157	79.1	53.1
40	152	78.4	52.5
45	159	79.4	53.3
50	160	79.6	53.5
55	157	79.1	53.1
60	152	78.4	52.5
65	150	78.2	52.2
70	151	78.2	52.3
75	150	78.1	52.2
80	149	77.9	52.0
85	148	77.8	51.9
90	147	77.6	51.8
95	143	77.1	51.3
100	138	76.2	50.5
105	134	75.7	50.0
110	135	75.7	50.0
115	136	75.9	50.2
120	135	75.8	50.1
125	134	75.7	50.0
130	136	75.9	50.2
135	134	75.6	50.0
140	132	75.3	49.7
145	132	75.4	49.8
150	132	75.3	49.7
155	128	74.7	49.1
160	126	74.3	48.8

TABLE V
COMPUTED CONTOUR DATA
KBUS, PARIS, TEXAS
CHANNEL 270C2, 50 KW, 150 METERS
JANUARY 2002
 (continued)

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 54 dBu <u>0.5 mV/m</u> km	<u>F(50,50)</u> 60 dBu <u>1.0 mV/m</u> km
165	124	73.9	48.5
170	124	74.1	48.6
175	128	74.6	49.1
180	132	75.3	49.7
185	133	75.4	49.8
190	132	75.4	49.7
195	135	75.7	50.0
200	136	75.9	50.2
205	137	76.1	50.4
210	136	76.0	50.3
215	137	76.2	50.5
220	139	76.4	50.6
225	139	76.4	50.7
230	141	76.7	51.0
235	146	77.4	51.6
240	145	77.3	51.5
245	147	77.6	51.8
250	151	78.2	52.3
255	153	78.5	52.5
260	157	79.2	53.1
265	159	79.4	53.3
270	158	79.2	53.2
275	156	78.9	52.9
280	153	78.6	52.6
285	151	78.2	52.3
290	148	77.8	52.0
295	151	78.3	52.3
300	153	78.5	52.6
305	151	78.2	52.3
310	152	78.4	52.4
315	150	78.2	52.2
320	152	78.5	52.5

TABLE V
COMPUTED CONTOUR DATA
KBUS, PARIS, TEXAS
CHANNEL 270C2, 50 KW, 150 METERS
JANUARY 2002
 (continued)

Radial <u>Bearing</u> N ° E, T	<u>HAAT*</u> meters	<u>Predicted Distance to Contour**</u>	
		<u>F(50,10)</u> 54 dBu <u>0.5 mV/m</u> km	<u>F(50,50)</u> 60 dBu <u>1.0 mV/m</u> km
325	156	79.0	53.0
330	160	79.5	53.4
335	162	79.8	53.6
340	161	79.7	53.6
345	162	79.8	53.7
350	164	80.0	53.9
355	166	80.3	54.1

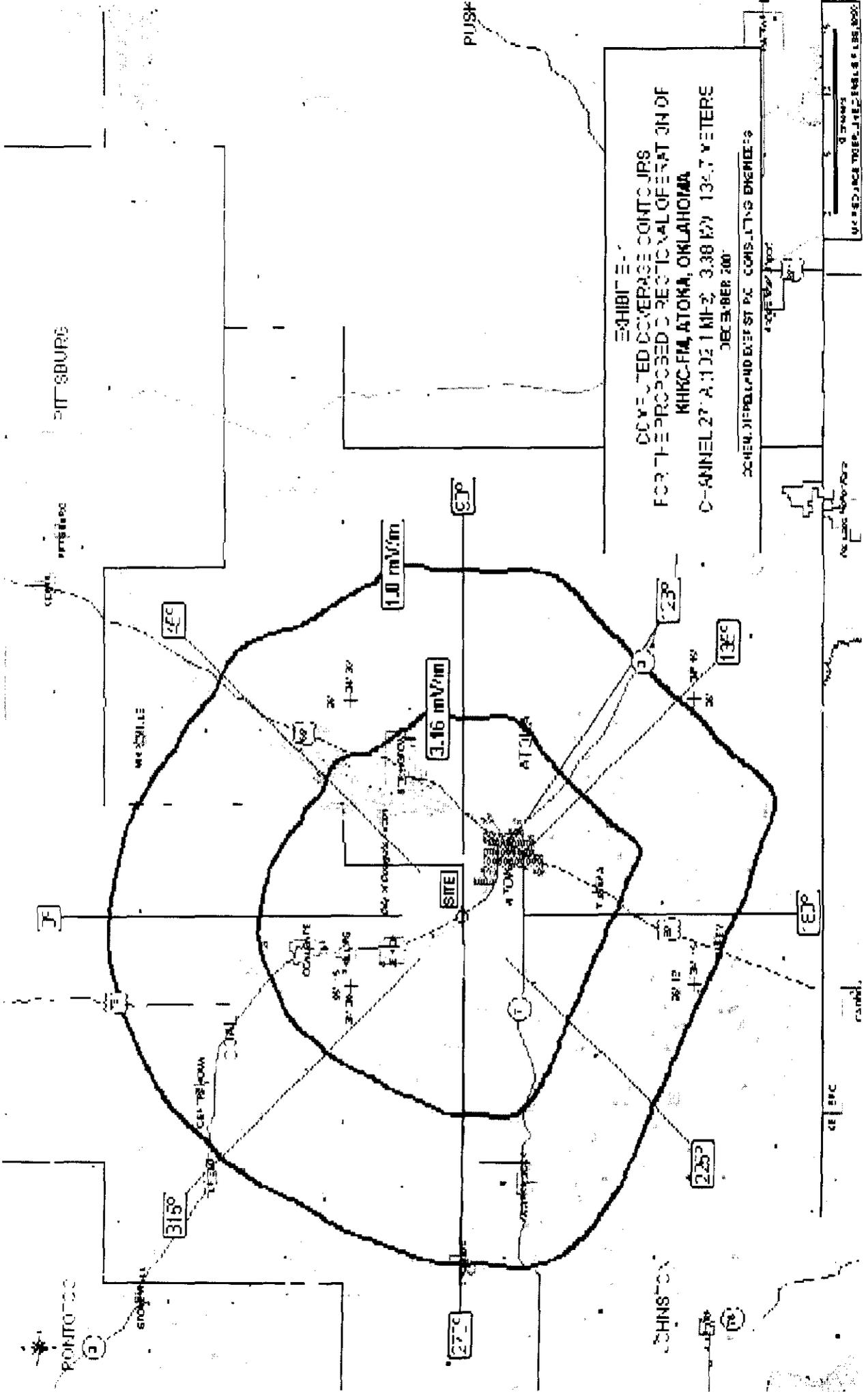
Channel 270C2 (101.9 MHz)
 Effective Radiated Power 50 kW (16.99 dBk)**
 Center of Radiation 297 meters AMSL**
 Assumed Antenna Height Above Average Terrain 150 meters*

NAD-27

North Latitude: 32° 34' 54"
 West Longitude: 96° 58' 32"

*NGDC 3-second data base.

**Presumed use of maximum ERP and AHAAT for a Class C2 FM operation.



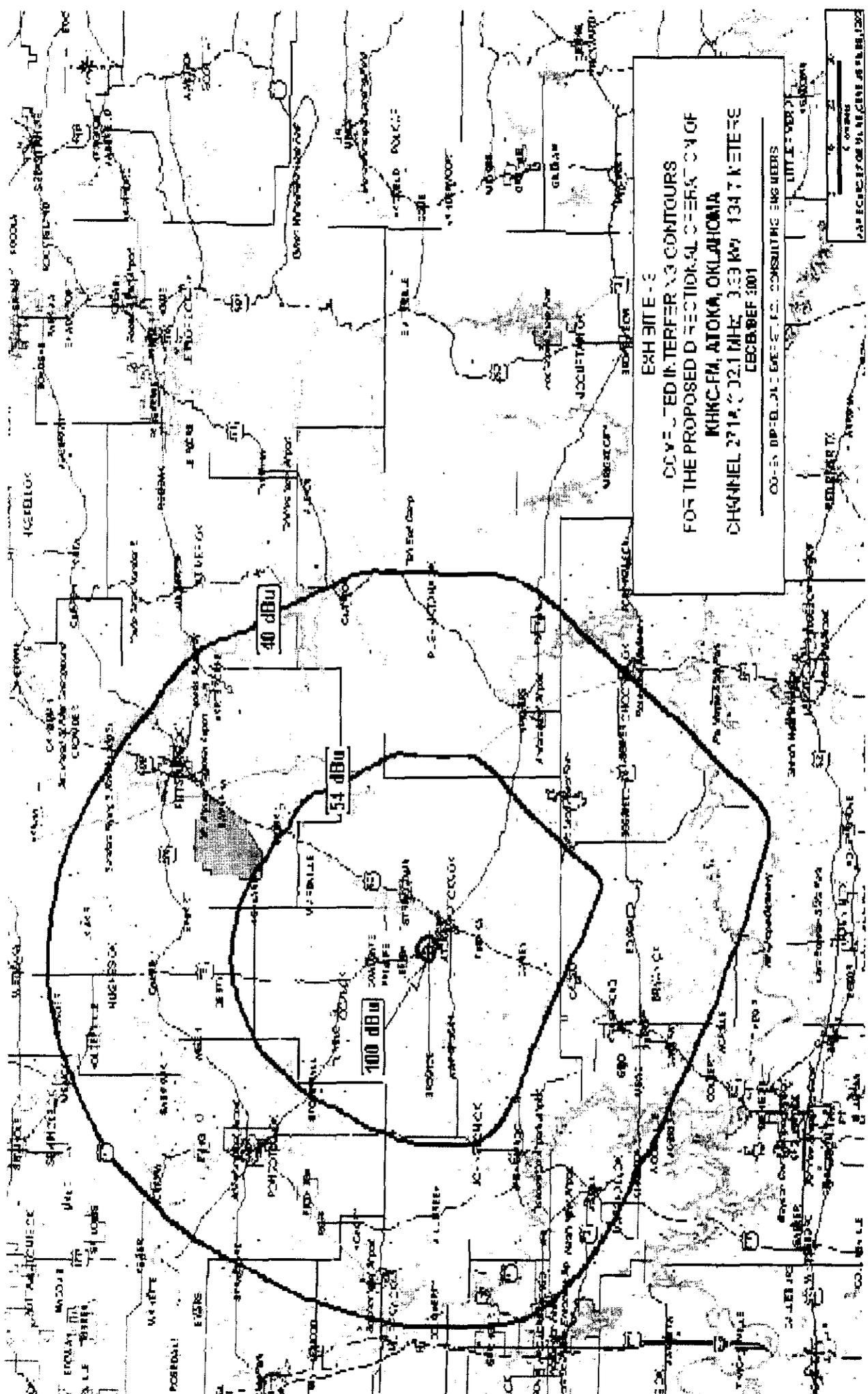


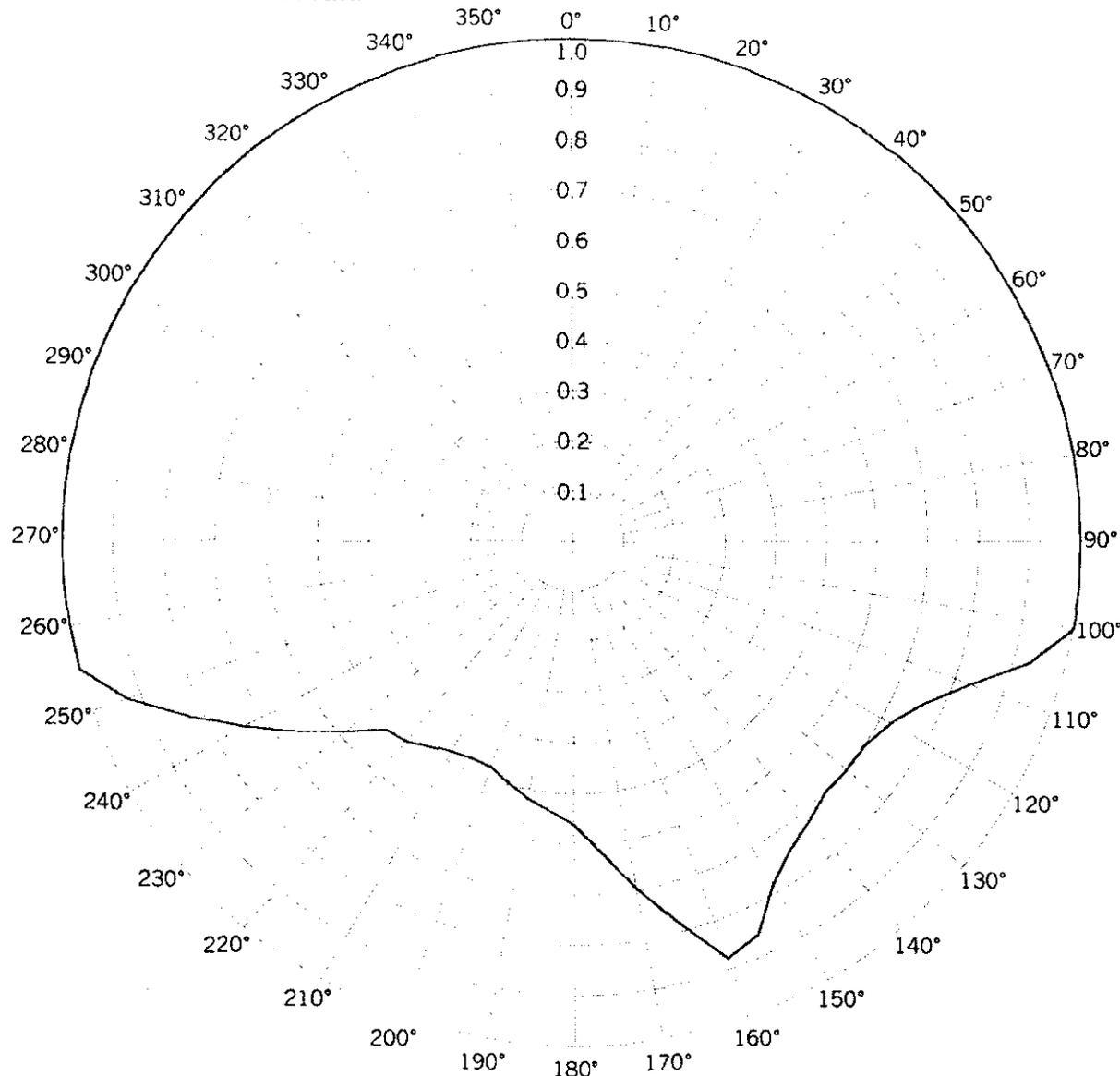
EXHIBIT E-3
 PREDICTED INTERFERENCE CONTOURS
 FOR THE PROPOSED FEDERAL OPERATION OF
 KHHC-FM, ATOKA, OKLAHOMA
 CHANNEL 271A, 122.1 MHz, 3.63 KW, 134.7 METERS
 CO-EN. DR. B. J. L. GREEN, P.E., CONSULTING ENGINEERS
 DECEMBER 2001

TITLE SHEET 1
 1 2 3 4 5 6 7 8 9 10 11 12
 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32
 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100
 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200
 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300
 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400
 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500
 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600
 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700
 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800
 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900
 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000

EXHIBIT E-4
TABULATION OF
HORIZONTAL RADIATION PATTERN FOR
KHKC-FM, ATOKA, OKLAHOMA
JANUARY 2002

<u>Azimuth</u> N ° E, T	<u>Relative</u> <u>Field</u>	<u>ERP</u> kW	<u>Azimuth</u> N ° E, T	<u>Relative</u> <u>Field</u>	<u>ERP</u> kW
0	1.000	3.38	180	0.560	1.06
5	1.000	3.38	185	0.535	0.97
10	1.000	3.38	190	0.515	0.90
15	1.000	3.38	195	0.495	0.83
20	1.000	3.38	200	0.475	0.76
25	1.000	3.38	205	0.475	0.76
30	1.000	3.38	210	0.480	0.78
35	1.000	3.38	215	0.495	0.83
40	1.000	3.38	220	0.515	0.90
45	1.000	3.38	225	0.525	0.93
50	1.000	3.38	230	0.585	1.16
55	1.000	3.38	235	0.656	1.45
60	1.000	3.38	240	0.737	1.84
65	1.000	3.38	245	0.826	2.31
70	1.000	3.38	250	0.927	2.90
75	1.000	3.38	255	1.000	3.38
80	1.000	3.38	260	1.000	3.38
85	1.000	3.38	265	1.000	3.38
90	1.000	3.38	270	1.000	3.38
95	1.000	3.38	275	1.000	3.38
100	1.000	3.38	280	1.000	3.38
105	0.930	2.92	285	1.000	3.38
110	0.830	2.33	290	1.000	3.38
115	0.760	1.95	295	1.000	3.38
120	0.720	1.75	300	1.000	3.38
125	0.700	1.66	305	1.000	3.38
130	0.700	1.66	310	1.000	3.38
135	0.700	1.66	315	1.000	3.38
140	0.720	1.75	320	1.000	3.38
145	0.740	1.85	325	1.000	3.38
150	0.780	2.06	330	1.000	3.38
155	0.855	2.47	335	1.000	3.38
160	0.876	2.59	340	1.000	3.38
165	0.781	2.06	345	1.000	3.38
170	0.696	1.64	350	1.000	3.38
175	0.620	1.30	355	1.000	3.38

HORIZONTAL PLANE PATTERN



Relative Intensity

EXHIBIT E - 5
COMPUTED HORIZONTAL
RADIATION PATTERN
(MAXIMUM ENVELOPE
PLOTTED IN RELATIVE FIELD)
KHKC-FM, ATOKA, OKLAHOMA
DECEMBER 2001

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS

SECTION III-B FM Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: 271

2. Class: A B1 B C3 C2 C1 C D

3. Antenna Location Coordinates: (NAD 27)
34 ° 25 ' 08 " N S Latitude
96 ° 11 ' 24 " E W Longitude

4. One-Step Proposal Allotment Coordinates: (NAD 27) Not applicable
 _____ ° _____ ' _____ " N S Latitude
 _____ ° _____ ' _____ " E W Longitude

5. Antenna Structure Registration Number: 1010436
 Not applicable FAA Notification Filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: 188.4 meters

7. Overall Tower Height Above Ground Level: 138.5 meters

8. Height of Radiation Center Above Ground Level: 134.6 meters (H) 134.6 meters (V)

9. Height of Radiation Center Above Average Terrain: 134.7 meters (H) 134.7 meters (V)

10. Effective Radiated Power: 3.38 kW (H) 3.38 kW (V)

11. Maximum Effective Radiated Power: Not applicable _____ kW (H) _____ kW (V)
 (Beam-Tilt Antenna ONLY)

12. Directional Antenna Relative Field Values: Not applicable (Nondirectional)
 Rotation: 0 ° No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	1.0	60	1.0	120	0.720	180	0.560	240	0.737	300	1.0
10	1.0	70	1.0	130	0.700	190	0.515	250	0.927	310	1.0
20	1.0	80	1.0	140	0.720	200	0.475	260	1.0	320	1.0
30	1.0	90	1.0	150	0.780	210	0.480	270	1.0	330	1.0
40	1.0	100	1.0	160	0.876	220	0.515	280	1.0	340	1.0
50	1.0	110	0.830	170	0.696	230	0.585	290	1.0	350	1.0
Additional Azimuths		123	0.707	135	0.700	225	0.525				

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

13. **Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203. Yes No

See Explanation in Exhibit No.

14. **Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315. Yes No

See Explanation in Exhibit No.

15. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125. Yes No

See Explanation in Exhibit No.

16. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. Yes No

See Explanation in Exhibit No.

Separation Requirements.

a. 47 C.F.R. Section 73.207.

Grandfathered Short-Spaced.

b. 47 C.F.R. Section 73.213(a) with respect to station(s): _____
Exhibit Required.

Exhibit No.

c. 47 C.F.R. Section 73.213(b) with respect to station(s): _____
Exhibit Required.

Exhibit No.

d. 47 C.F.R. Section 73.213(c) with respect to station(s): _____
Exhibit Required.

Exhibit No.

Contour Protection.

c. 47 C.F.R. Section 73.215 with respect to station(s): KDGE, KBUS
Exhibit Required.

Exhibit No. E

17. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.* the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.** Yes No

See Explanation in Exhibit No. E

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Warren M. Powis Cohen, Dippell and Everist, P.C.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature <i>Warren M. Powis</i>		Date <i>January 11, 2002</i>	
Mailing Address 1300 L Street, N.W., Suite 1100			
City Washington		State or Country (if foreign address) D.C.	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111		E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).