

EXHIBIT A

Technical Narrative

I. Proposed 246A Cameron, AZ

The Petitioner in Docket 02-73, RM-10400 has requested channel 246A at coordinates 35-52-30 N and 111-24-48 W. Cameron is a Census Designated Place [CDP] with 2000 Census population of 978 persons.

The allotment of 246A at Cameron, AZ is mutually exclusive with Arizona Radio Partners request for 247C at First Mesa, AZ. First Mesa, AZ is also a CDP but with 2000 Census population of 1,124 persons, some 16% greater than that of Cameron. Arizona Radio Partners' Counterproposal put forth a plan which would allot 289A at the coordinates used in the NPRM. NPR filed a counterproposal in the same proceeding specifying several possible alternate channels at Cameron. Finally, Tusayan Broadcasting has requested that 293C1 be allotted at Cameron. With at least two expressions of interest for a station at Cameron in this proceeding, and in the context of the Global Resolution, any or all these channels or facilities are acceptable to Arizona Radio Partners.

II. Proposed 247C First Mesa, AZ

The Arizona Radio Partners Counterproposal requested the allotment of 247C at First Mesa, AZ at coordinates 35-41-09 North Latitude 110-21-43 West Longitude. First Mesa, AZ as previously mentioned, has a 2000 US Census population of 1,124 persons. At the proposed site, First Mesa is completely within the hypothetical city-grade contour of 247C. Additionally, some 63,294 persons would receive an additional full time reception service. Arizona Radio Partners renews its request for this allotment in the context of the Global Resolution.

In a large number of cases, this new allotment would represent only the second full time reception service (Gray Area). It is estimated that an area of approximately 411 square kilometers and over 4,400 persons are affected.

The communities which fall within this gray area are:

247C at First Mesa, AZ

Gray Area Coverage

Community	Type	Population	% Cvr	Persons
Chilchinbito	CDP	462	15%	69
Rough Rock	CDP	469	45%	211
Chinle	CDP	5366	60%	3220
Chinle	CCD	9903	5%	465
Pinon	CCD	6284	8%	496
Total				4462

The method used to determine the affected populations is based on uniform population distribution per unit of area.

247C can be allotted at the site reference previously mentioned in full compliance with 73.207 spacing requirements except for two short spacings, KVNA 248C Flagstaff, AZ and the vacant allotment 246C3 at Bagdad, AZ. These short spacings are eliminated by subsequent changes put forth within the Arizona Radio Partners Counterproposal and Arizona Radio Partners renews the request for these changes in the context of the Global Resolution.

III. KVNA 248C Dewey-Humboldt, AZ

KVNA 248C Flagstaff, AZ proposes to move, thus eliminating the first short spacing mentioned in paragraph II above and permitting the allotment of 247C at First Mesa, AZ. KVNA, by changing reference site to coordinates 34-14-42 North Latitude 112-21-27 West Longitude, proposes to provide a first local radio service to Dewey-Humboldt, AZ. At the proposed site, Dewey-Humboldt, AZ, a CDP with 6,295 persons according to the 200 US Census, is completely within the hypothetical city-grade contour of 248C.

The reallocation of 248C from Flagstaff, AZ to Dewey-Humboldt, AZ results in a coverage increase of some 1,783,000 persons in an area of 19,630 sq. km. While service is lost to only 105,246 persons in an area of 14,129 sq. km. The land areas differ principally because a full facilities Class C is proposed at Dewey-Humboldt. The coverage results are tabulated in the table which can be found in the Summary section below. Arizona Radio Partners renews its request for this allotment. As has been previously shown, no person is underserved by this reallocation.

This move and the associated new site reference for KVNA are also consistent with the spacing requirements of 73.207, with the exception of three short spacings and one related allotment.

Two of the short spacings, both at Parker AZ, arise from a pending proceeding. Another of these short spacings is a vacant allotment 246C3 Bagdad, AZ. The last of these of these is station KRXS 247C2 at Globe, AZ. These short spacings are eliminated by subsequent changes contained within this Counterproposal.

IV. Proposed 247C3 and 248B1 Parker, AZ

The short spacing and implication of a related allotment encountered in the move and reallocation of KVNA are to proposed allotments at Parker, AZ in Docket 2001-69. Although an Order has been issued in that Docket, it is not yet effective. As such, to eliminate any issue of contingency and to preserve any rights the proponents of these Parker allotments may have going forward, Arizona Radio Partners previously offered a single channel which could be substituted for either of the two mutually-exclusive proposals in that proceeding. There is further benefit to considering these allotments together which impacts the future usable area for KVNA at Dewey-Humboldt, AZ.

While 248C at Dewey-Humboldt is short spaced to only the 248B1 proposal, channel 252 can be substituted for either proposed allotment at the sites proposed in the respective petitions. Although not explicitly required by 73.207, should the ordered 247C3 be the eventual allotment result at Parker, Arizona Radio Partners renews the request that 252C3 be allotted instead in the context of the Global Resolution, as the result would be greater flexibility in site selection for KVNA without prejudicing any possible outcome in Docket 2001-69.

V. Vacant 246C3 Bagdad, AZ

Vacant allotment 246C3 at Bagdad, AZ is shortspaced to both the allotment of 247C at First Mesa, AZ and the reallocation of 248C from Flagstaff, AZ to Dewey-Humboldt, AZ. This Counterproposal offers alternate channel 269C3 which can be allotted at the identical reference site to that of 246C3. Arizona Radio Partners renews the request for this channel substitution.

VI. KRXS 247C2 Globe, AZ

To accommodate the move of KVNA as described in III above, the final short spacing which must be eliminated involves KRXS 247C2 Globe, AZ. 231C2 can be allotted at the present KRXS site in full compliance with 73.207 except for two short spacings.

One of the short spacings appears to involve a Mexican 231B1 allotment at Sonoita, Sonora, Mexico. Upon further analysis, KRXS is already short spaced to a Mexican Class B allotment on 247B at Sonoita and the two Mexican allotments are at the identical site. Because both the present KRXS channel 247 and the proposed replacement channel 231 are subject to identical co-channel short spacings, the channels would seem to be equivalent.

Closer study reveals that the reference site for both the 231B and the 247B allotments at Sonoita, SO, MX is actually located within the United States. In order to confirm this, a surveyor was hired by the Petitioner to map the coordinates and certify that the point described is North of the US-Mexico border.

The city of Sonoita is at 32-51-02 North Latitude 109-32-15 West Longitude, a distance of 247.15 KM at bearing 230.7 degrees from the KRXS site. If the reference site for Sonoita 231B and 247B is at the Community coordinates, the existing facility and the proposed channel substitution are both clear by over 10 KM. If, however, all that can be assumed is that the reference site is South of the US-Mexico border, then the Surveyor's statement that the reference is "...approximately 1.4 miles North of the US Mexican border..." or 2 KM inside the US border, where the apparent short spacing is only 1.48 KM, would seem to eliminate any reasonable possibility of a short space. The nearest point of land in Mexico which meets the 237 KM spacing requirement to KRXS is 31-50-21 N 112-41-5 W and is closer to either of Ejido Desierta de Sonora, SO or Santa Rosa, SO than to Sonoita, SO. The next nearest allotment site in Mexico is Colonia Reforma, SO. The first point of land inside Mexico and 237 KM from KRXS (calculated to be 31-50-21 N 112-41-5 W) is actually 2 KM closer to the city of Colonia Reforma than to the city of Sonoita.

Finally, an analysis of FCC contours, presuming the actual facility at KRXS and a full-facilities Class B at the likely-erroneous north-of-the-border reference site for Sonoita showed no interference overlap. Mexican concurrence for a co-channel class B facility at Globe was apparently had with the issuance of the 247C2 CP (BPH-19980824IA).

Arizona Radio Partners renews the request for this reallocation in the context of a Global Resolution.

The replacement of 247C2 at Globe, AZ with 231C2 is short spaced to only one domestic facility, KXKQ 231C1, Safford, AZ. This remaining short space is eliminated by a move and downgrade of KXKQ.

VII. KXKQ 232C2 Safford, AZ

To accommodate the replacement of 247C2 at Globe, AZ as described in VI above requires a move, channel change and downgrade of KRXS, Safford, AZ. This Counterproposal offers 232C2 as the replacement facility for KXKQ Safford, AZ. 232C2 can be allotted in full compliance with 73.207 spacing requirements at 32-51-02 North Latitude 109-32-15 West Longitude.

This site has the advantage of being considerably closer to the community and Safford, AZ is entirely within the hypothetical city grade contour of the proposed facility. Arizona Radio Partners renews the request for this reallocation in the context of the Global Resolution.

VIII. Summary

The contribution of the Arizona Radio Partners' component of the Global Resolution is first local service to two Arizona communities and second reception service to an additional population. There are no individuals that would be underserved as a result of the plan.

Dewey-Humboldt, AZ, a Census Designated Place that is home to 6,295 persons receives a first local service. First Mesa, AZ, A Census Designated Place that is home to 1,124 persons receives a first local service. An estimated 4,462 persons who now receive only one interference free service from KTNN-AM, Window Rock will now have a second reception service. I expect if you asked some of those individuals, they would tell you that on stormy nights, KTNN is anything but interference free. As such, a first interference free FM reception service has even greater merit.

In addition, almost one and three-quarters millions of persons will receive another interference free service.

The following was compiled from the 2000 U.S. Census:

Population Gain - Loss

Allotment	Community	Present	Proposed	Gain/Loss
248C	Dewey-Humboldt	176,693	1,960,057	1,783,364
231C1/232C2	Safford, AZ	48,961	36,189	-12,772
			Cumulative Gain	1,770,592

Finally, the request for a new first local service at Cameron, AZ can be accommodated at coordinates identical to those in the NPRM or in a variety of other ways detailed herein. Additionally, all the requested changes to the Table of Allotments in the NPR Counterproposal have been accommodated allowing for the associated benefits to be realized.

For these reasons, this Counterproposal and the Global Resolution should be adopted in its entirety.

EXHIBIT B

ENGINEERING STATEMENT
And
EXHIBITS
IN SUPPORT of REPLY COMMENTS
Filed By
NPR PHOENIX, L.L.C.
In
MB Docket # 02-73
RM-10400

JUNE 2002

ABSTRACT:

The engineering exhibits found herein were prepared by the firm of **KLEIN BROADCAST ENGINEERING, L.L.C.**, in support of REPLY COMMENTS filed with the Federal Communications Commission by NPR in MB Docket #02-73 / RM-10400.

The geographic coordinates found in this engineering statement are from the North American Datum 1927 (NAD27). The reference geographic coordinates for the communities specified herein were obtained from The U.S. Census Bureau, Gazetteer of "Places" in the United States. This database may be found on the Internet at: <http://ftp.census.gov/geo/www/gazeteer/places.html>.

ENGINEERING STATEMENT:

CAMERON , ARIZONA

FM CHANNEL 293 C1 / 106.5 mHz. is proposed for allotment to this community as this community's First Local Aural Service and First Local Aural Wide Area Service. NPR finds that FM CHANNEL 293 Class C1 / 106.5 mHz. or as an alternative Channel 293 A may be assigned to Cameron, Arizona, as a substitute FM Channel for FM Channel 246 A without the use of a site restriction for either a Class C1 or Class A allotment, either may be assigned in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission. The 70dBu contour of a maximum Class C1 facility extends 50.2 kilometers distant from the transmitter site. Therefore this proposed allotment will provide the entire Principal Community of Cameron, Arizona, with the required "City Grade" 70dBu service, in compliance with Section 73.315 of the Rules and Regulations of the Federal Communications Commission.

CAMERON , ARIZONA cont'd

Engineering Exhibit E-1 is a complete FM Channel Spacing Study that shows the proposed allotment can be made in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission from the following geographic coordinates: NL:35-52-33 / WL:111-24-44.

(Because Class A allotments are less demanding from a spacing standpoint than the spacing requirements of a Class C1 allotment, a Class A facility on FM Channel 293 will easily "fit" at Cameron, Arizona, as an allotment alternative.) NPR has performed a complete FM Band Study at Cameron, Arizona, using the Reference Site Coordinates specified previously herein. As a result of "running " this study NPR has determined there are more than fifteen (15) Class A Channels that may be allotted to the Community of Cameron, Arizona. A partial listing of FM Class A Channels that qualify under Section 73.207 of the Commission's Rules from the Reference Site Coordinates specified herein are: FM Channel 292A, 284A, 242A, 294A, 241A and 289A.

GRAND CANYON VILLAGE , ARIZONA

FM CHANNEL 273 C1 / 102.5mHz. is proposed for allotment to this community and may be assigned in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission. No Site Restriction is necessary for this proposed allotment. The reference coordinates for this site are: NL: 36-02-47 / WL: 112-09-13.

The 70dBu contour of maximum Class C1 facilities extends 50.2 kilometers from the transmitter site and this proposed allotment would provide the entire Principal Community, Grand Canyon Village, Arizona, with the required "City Grade" 70dBu service in compliance with Section 73.315 of the Rules and Regulations of the Federal Communications Commission.

GRAND CANYON VILLAGE , ARIZONA cont'd

FM Channel 273 Class C1 may be allotted to Grand Canyon Village, Arizona, without the use of a site restriction. Engineering Exhibit E-2 is a complete FM Channel Spacing Study that shows the proposed allotment can be made in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission.

BAGDAD , ARIZONA

FM CHANNEL 269 C3 / 101.7 mHz may be allotted to the proposed Principal Community of Bagdad, Arizona in lieu of FM Channel 246 C3 / 97.1 mHz. The reference coordinates for this proposed FM Channel substitution of FM Channel 269 Class C3 for the presently allotted and vacant FM Channel 246 Class C3 would remain unchanged at: NL:34-36-11 / WL:113-12-04 This site would be Site Restricted 2.4 kilometers NW of Bagdad, Arizona on a bearing of 317 degrees True. The 70dBu contour extends 23.3 kilometers distant from a Maximum Class C3 facility transmitter site, therefore the entire proposed Principal Community of Bagdad, Arizona would receive 70dBu coverage as required in compliance with Section 73.315 of the Rules and Regulations of the Federal Communications Commission.

Engineering Exhibit E-3 is an FCC FM Channel Spacing Study based on the requirement of Section 73.207 of the Rules and Regulations of the Federal Communications Commission. This study shows the requested allotment of FM Channel 269 Class C3 may be made as proposed in full compliance with the Rule Section captioned above.

ASH FORK , ARIZONA

NPR proposes the allotment of FM Channel 267 / 101.3MHz Class A. at Ash Fork, Arizona. The proposed allotment of FM Channel 267 Class A may be made to the community of Ash Fork, Arizona, in complete compliance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission. Engineering Exhibit E-4 clearly demonstrates this compliance at the reference coordinates for this proposed FM channel allotment. The reference coordinates for FM Channel 267 Class A at Ash Fork, Arizona, are: NL:35-16-13 / WL:112-32-31

This proposed reference site requires the use of a moderate Site Restriction of 7.35 kilometers NW of the community of Ash Fork, Arizona, on a bearing of 314 degrees True from the proposed Principal Community, Ash Fork, Arizona. The 70dBu City Grade Contour of a maximum Class A facility extends 16.6 kilometers distance from its transmitter site. Therefore even with the consideration of the required moderate proposed site restriction, the Principal Community of Ash Fork, Arizona, will be wholly contained within the predicted 70dBu City Grade Contour from a maximum Class A facility transmitting from the proposed site restricted reference coordinates for this allotment, as required by Section 73.315 of the Rules and Regulations of the Federal Communications Commission. Thus, the allotment of FM Channel 267 A may be made to Ash Fork, Arizona , in full compliance with the Rules and Regulations of the Federal Communications, as amended to date.

CHINO VALLEY , ARIZONA

FM CHANNEL 232 C3 / 94.3mHz. is proposed for allotment to Chino Valley, Arizona, and may be assigned in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission with a moderate site restriction of 14.7 kilometers NNW of Chino Valley, Arizona, on a bearing of 323 degrees True from the proposed Principal Community, Chino Valley, Arizona.

The 70dBu contour of maximum Class C3 facilities extends 23.3 kilometers from the transmitter site and this proposed allotment would provide the entire Principal Community, Chino Valley, Arizona, with the required "City Grade" 70dBu service in compliance with Section 73.315 of the Rules and Regulations of the Federal Communications Commission. Engineering Exhibit E-5 is a complete FM Channel Spacing Study that shows the proposed allotment can be made in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission from the following reference coordinates for the site restricted location: NL:34-52-03 / WL:112-33-04. At the present time FM Broadcast Station KFPB(FM) (formerly KPZ) is operating on FM Channel 280C3 at Chino Valley, Arizona. This station has consented to relocate its transmission main facility and change frequency to FM CHANNEL 232 C3 / 94.3mHz. if the Commission allocates FM CHANNEL 232C3 in place of FM CHANNEL 280C3 at Chino Valley, Arizona. When the Commission acts favorably on the proposed allotment of FM Channel 232 Class C3 at Chino Valley, Arizona, we respectfully request the Commission modify the FM Broadcast Station License of FM Broadcast Station KFPB(FM) to specify operation on FM Channel 232 Class C3. The substitution of FM Channel 232 Class C3 at Chino Valley, Arizona, will allow for the proposed allotment of FM Channel 280 Class C1 at Gilbert, Arizona, as proposed previously in the NPR Counterproposal Engineering Statement as previously filed with the Commission in this docketed proceeding.

GILBERT , ARIZONA

FM CHANNEL 280 C1 / 103.9mHz. is proposed for allotment to this community and may be assigned in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission with a site restriction 29.6 kilometers NE of Gilbert, Arizona on a bearing of 69 degrees True. It is proposed to upgrade the existing allotment of FM CHANNEL 280 C2 / 103.9mHz. at Gilbert, Arizona, to Class C1 status for the use of FM Broadcast Station KEDJ(FM). KEDJ(FM) now operates on FM Channel 280 Class C2, at Gilbert, Arizona. Upon adopting the requested upgraded allotment of FM Channel 280 Class C1, at Gilbert, Arizona, NPR requests the license of FM Station KEDJ(FM) be modified to specify operation on FM Channel 280 Class C1. Upon receipt of this modification order, NPR will file FCC Form 301 a minor change application to construct the upgraded Class C1 facility on FM Channel 280 at Gilbert, Arizona. Upon a grant of such an application by the Commission, NPR will construct the facility authorized as quickly and expeditiously as possible to bring this upgraded service to the Principal Community of Gilbert, Arizona.

The 70dBu contour from a maximum Class C1 facility extends 50.2 kilometers from the transmitter site. This proposed allotment would provide the entire Principal Community, Gilbert, Arizona, with the required "City Grade" 70dBu service in compliance with Section 73.315 of the Rules and Regulations of the Federal Communications Commission. Engineering Exhibit E-6 is a complete FM Channel Spacing Study and shows the proposed upgraded allotment can be made in accordance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission for the Principal Community of Gilbert, Arizona, at the site restricted geographic coordinates of: NL: 33-25-39 / WL: 111-28-03

Engineering Exhibit E-6, the FM Channel Spacing Study shows a "short spacing" to FM Channel 280 Class C3 at Chino Valley, Arizona, which has previously been addressed herein (see **CHINO VALLEY, ARIZONA**) and is eliminated by the proposed substitution of FM Channel 232 Class C3 to that community.

GILBERT , ARIZONA cont'd

Another "short spacing" is shown in Engineering Exhibit E-6, also, that has just recently appeared in the Commission's CDBS FM Database. It is the proposed allotment of FM Channel 282 Class C to the Community of Lake Montezuma, Arizona. NPR proposes the Commission change the proposed reference site coordinates for this allotment to eliminate this "short spacing" to the proposed reference site for FM Channel 280 Class C1 at Gilbert, Arizona. This requested change in reference site coordinates may be effectuated easily in compliance with FCC Rule Sections 73.207 and 73.315.

(see **LAKE MONTEZUMA, ARIZONA**) Therefore, the allotment of FM CHANNEL 280 C1 at Gilbert, Arizona, will comply with Section 73.207 of the Rules and Regulations of the Federal Communications Commission. As a great benefit to the General Public, additional large increases in area and population served within the protected 60dBu contour of the proposed upgraded allotment of FM Channel 280 Class C1, at Gilbert, Arizona, are compelling reasons to adopt the proposed allotment of FM Channel 280 Class C1, at Gilbert, Arizona. The upgraded allotment of FM CHANNEL 280 C1 at Gilbert, Arizona, (a Class C1 maximum facility from the Section 73.207 reference site) would provide the public with an increase in coverage area of 47.3% within the "Primary Protected Contour" (60dBu / 1.00mV/M) over the existing Class C2 facility and an increase in population within the "Primary Protected Contour" (60dBu/1.00mV/M) of the proposed FM CHANNEL 280Class C1 upgraded facility of 46.1%. The actual calculated area within the existing Class C2 facility (60dBu / 1.00 mV/M) contour is 8,566.152 square kilometers compared to the proposed Class C1 facility area within the (60dBu / 1.00mV/M) contour of 16,245.19 square kilometers.

GILBERT , ARIZONA cont'd

The population now served within the existing Class C2 (60dBu / 1.00mV/M) contour is 1,666,029 persons (2000 U. S. Census) as compared to the population to be served within the proposed Class C1 upgrade of 3,088,824 persons (2000 U. S. Census) The areas with the existing Class C2 and proposed Class C1 (60dBu / 1.00mV/M) "Primary Protected Contours" quoted on the previous page were calculated using the Commission's "Standard Contour Prediction Method" found in Section 73 of the Rules and Regulations of the Federal Communications Commission. Clearly, these percentage increases are significant and benefit the public interest.

LAKE MONTEZUMA , ARIZONA

In a previous filing with the Commission, NPR has established the Section 73.207 Reference Site and Geographic Coordinates for the proposed FM Channel 280 Class C1 Upgrade at Gilbert, Arizona. It has come to the attention of NPR that the licensee of FM Broadcast Station KAJM, Payson, Arizona, has filed a petition for rulemaking proposing to allot FM Channel 282 Class C at Lake Montezuma, Arizona, and delete the same channel from Payson, Arizona. In this petition for rulemaking the petitioner proposed a reference site that is "short spaced" to the reference site proposed for FM Channel 280 Class C1 at Gilbert, Arizona, as proposed by NPR. NPR has a curative solution to what appears to be a Mutually Exclusive proposal at Lake Montezuma, Arizona, with the NPR proposal of the Class C1 upgrade of FM Channel 280 at Gilbert, Arizona.

LAKE MONTEZUMA , ARIZONA cont'd

Looking at Engineering Exhibit E-6, the FM Channel Spacing Study for the Reference Site Class C1 upgrade at Gilbert, Arizona, one sees a 3.78 kilometer short spacing to the proposal at Lake Montezuma, Arizona. This Mutual Exclusivity and Short Spacing may be eliminated by a very small change in the Reference Coordinates for the proposal of FM Channel 282 Class C at Lake Montezuma, Arizona. NPR proposes the Commission adopt new Reference Coordinates for the proposed allotment of FM Channel 282 Class C, at Lake Montezuma.

The proposed new reference coordinates are: NL: 34-21-58 / WL: 111-34-26.

If changed to these coordinates the short spacing to the NPR upgrade of FM Channel 280 Class C1, at Gilbert, Arizona, may be completely eliminated. Engineering Exhibit E-7 is an FM Channel Spacing Study for FM Channel 282 Class C for Lake Montezuma, Arizona, and demonstrates compliance with Section 73.207 of the Rules and Regulations of the Federal Communications Commission. The proposed reference site for this allotment is Site Restricted 36.4 kilometers SE of the proposed Principal Community of Lake Montezuma, Arizona, on a bearing of 146 degrees True. The 70dBu "City Grade" contour of a maximum Class C facility extends 66.0 kilometers from its transmitter site and would wholly encompass the proposed Principal Community, Lake Montezuma, Arizona, in compliance with Section 73.315 of the Commission's Rules. Engineering Exhibit E-7A is an AREA TO LOCATE MAP based on the above proposed reference coordinates and is included herein as an aid to Commission staff.

NPR continued to study the proposed allotment of FM Channel 282 Class C at Lake Montezuma, Arizona, and found the present LICENSED site of Station KAJM(FM) may also be used as the reference site for the proposed allotment to Lake Montezuma, Arizona. NPR also found the LICENSED site of KAJM(FM) is slightly closer to the proposed Principal Community of Lake Montezuma, Arizona, and requires slightly less of a Site Restriction.

LAKE MONTEZUMA , ARIZONA cont'd

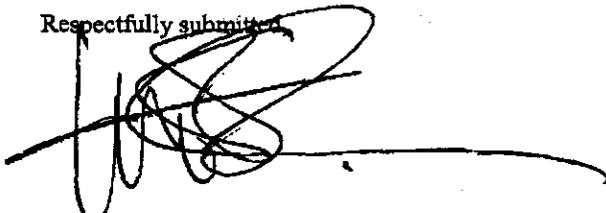
Engineering Exhibit E-8 is an FM Channel Study based on the licensed site of Station KAJM(FM). This exhibit demonstrates compliance with Section 73.207 of the Commission's Rules for the allotment of FM Channel 282 Class C at Lake Montezuma, Arizona, with a Site Restriction of 35.6 kilometers SE of the proposed Principal Community on a bearing of 131 degrees True. The 70dBu "City Grade" contour extends 66.0 kilometers distant from the transmitter site of a maximum Class C facility and would encompass the entire Principal Community of Lake Montezuma, Arizona, in compliance with Section 73.315 of the Commission's Rules. Engineering Exhibit E-8A is an AREA TO LOCATE MAP prepared and presented herein as an aid to the Commission's staff.

Of course it should be recognized that because a reference site is adopted for an allotment by the Commission, it is not mandatory and sometimes not practical to build a transmission facility at the reference coordinate location of an allotment, thus the petitioner, Sierra H Broadcasting, has complete latitude in making the choice for a suitable transmitter location should its proposal of FM Channel 282 Class C be adopted by the Commission for the Community of Lake Montezuma, Arizona.

NPR proposes the Commission adopt these reference site coordinates for the proposed allotment of FM Channel 282 Class C at Lake Montezuma, Arizona: **(EITHER) NL:34-21-58 / WL:111-34-26, or NL:34-25-48 / WL:111-30-16 (KAJM(FM) Presently Licensed Site)** With the adoption **(of either pair of geographic coordinates)** these proposed Reference Site Coordinates for Lake Montezuma, Arizona, any question of Mutual Exclusivity or Short Spacing is completely eliminated.

NPR respectfully requests the Commission adopt the proposed FM Channel allotments as proposed herein and amend Section 73.202 of the Commission's Rules accordingly, as clearly being in the Public Interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'E. Klein', with a long horizontal line extending to the right.

Elliott Kurt Klein,
Consulting Broadcast Engineer,
KLEIN BROADCAST ENGINEERING, L.L.C.

02 June 2002

JUNE 2002

NPR Phoenix, L.L.C.

MB DOCKET# 02-73
RM# 10400
CAMERON , ARIZONA

REPLY COMMENTS

ENGINEERING EXHIBITS E-1 through E-8

(Follow this page)

Klein Broadcast Engineering, L.L.C.

Job: CAMERON,AZ293C1.fmj

Master Database: 2002_MAY_31W.fmd

REFERENCE SITE COORDINATES: Lat: N35:52:33 Lon: W111:24:44

Channel: 293 Class: C1

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km

Comments: ENGINEERING EXHIBIT E-1 FM CHANNEL 293 CLASS C1 at CAMERON,AZ (NO SITE RESTRICTION)

Description: ENGINEERING EXHIBIT E-1 FM CHANNEL 293 CLASS C1 at CAMERON,AZ (NO SITE RESTRICTION)

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min	Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KPPV	N34:29:25	W112:32:00	PRESCOTT VALLEY	AZ	FM	294 : 106.7 MHz	C2	LIC	158		26.54	3.70	493	1st Adj	184.54	214
	N34:56:44	W111:38:22	MUNDS PARK	AZ	FM	291 : 106.1 MHz	A	VAC	75		30.25	0.00	0	2nd Adj	105.25	191
KSNE-FM	N36:00:30	W115:00:20	LAS VEGAS	NV	FM	293 : 106.5 MHz	C	LIC	270		54.57	100.00	352	Primary	324.57	273
KKMR	N32:56:39	W111:42:00	ARIZONA CITY	AZ	FM	293 : 106.5 MHz	C	VAC	270		56.27	0.00	0	Primary	326.27	185
DKKGL	N34:07:30	W109:56:12	PINETOP	AZ	FM	294 : 106.7 MHz	C1	VAC	177		59.37	0.00	0	1st Adj	236.37	145
951108MB	N34:03:42	W109:54:22	PINETOP	AZ	FM	294 : 106.7 MHz	C1	APP	177		66.77	100.00	299	1st Adj	243.77	146
951109MG	N34:15:06	W109:35:06	PINETOP	AZ	FM	294 : 106.7 MHz	C1	APP	177		68.45	55.00	378	1st Adj	245.45	137
K292DF	N35:14:28	W111:36:35	FLAGSTAFF	AZ	FM	292 : 106.3 MHz		LIC	0		72.66	0.01	695	1st Adj	72.66	194
KOMR	N33:57:21	W112:28:34	SUN CITY	AZ	FM	292 : 106.3 MHz	C2	LIC	158		76.14	23.00	221	1st Adj	234.14	205

Page 1 of 1

Date: 5/31/2002 12:58:29 PM

rfDetective-FM Version 1.3.4

Klein Broadcast Engineering, L.L.C.

Job: GRANDCANYONVILLAGE273C1.fmj

Master Database: 2002_MAY_31W.fmd

REFERENCE SITE COORDINATES: Lat: N36:02:47 Lon: W112:09:13

Channel: 273 Class: C1

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km

Comments: ENGINEERING EXHIBIT E-2 FM CHANNEL 273 CLASS C at GRAND CANYON VILLAGE, AZ (NO SITE RESTRICTION)

Description: ENGINEERING EXHIBIT E-2 FM CHANNEL 273 CLASS C at GRAND CANYON VILLAGE, AZ (NO SITE RESTRICTION)

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KQST	N34:58:05	W111:30:29	SEDONA	AZ	FM	275 : 102.9 MHz	C	LIC	105	28.20	90.00	437	2nd Adj	133.20	154
KNIX-FM	N33:19:58	W112:03:53	PHOENIX	AZ	FM	273 : 102.5 MHz	C	LIC	270	31.14	98.00	494	Primary	301.14	178
KAHM	N34:41:14	W112:07:01	PRESCOTT	AZ	FM	271 : 102.1 MHz	C	LIC	105	45.83	54.00	770	2nd Adj	150.83	179
	N36:00:30	W115:00:20	BOULDER CITY	NV	FM	274 : 102.7 MHz	C	ADD	209	48.09	0.00	0	1st Adj	257.09	269
KSTJ	N35:56:46	W115:02:34	BOULDER CITY	NV	FM	274 : 102.7 MHz	C	LIC	209	51.75	96.00	603	1st Adj	260.75	268
KNAD	N36:41:51	W111:37:57	PAGE	AZ	FM	219 : 91.7 MHz	C2	LIC	27	59.06	1.00	498	IF	86.06	033
	N37:50:30	W112:49:30	PAROWAN	UT	FM	272 : 102.3 MHz	A	ADD	133	75.01	0.00	0	1st Adj	208.01	343
KPUB	N35:14:34	W111:36:40	FLAGSTAFF	AZ	FM	219 : 91.7 MHz	C3	LIC	24	77.80	0.50	560	IF	101.80	151
	N37:10:30	W113:17:24	HURRICANE	UT	FM	275 : 102.9 MHz	C3	VAC	76	85.31	0.00	0	2nd Adj	161.31	321
KJJJ	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	272 : 102.3 MHz	C2	LIC	158	90.86	1.05	814	1st Adj	248.86	228

Klein Broadcast Engineering, L.L.C.

Job: BAGDAD,AZ269C3.fmj

Master Database: 2002_MAY_31W.fmd

REFERENCE SITE COORDINATES: Lat: N34:36:11 Lon: W113:12:04

Channel: 269 Class: C3

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km

Comments: ENGINEERING EXHIBIT E-3 FM CHANNEL 269 CLASS C3 at BAGDAD,AZ
(SITE RESTRICTION 2.4km NW of BAGDAD,AZ on a bearing of 317deg.T.)

Description: ENGINEERING EXHIBIT E-3 FM CHANNEL 269 CLASS C3 at BAGDAD,AZ
(SITE RESTRICTION 2.4km NW of BAGDAD, AZ on a bearing of 317deg.T.)

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KZON	N33:19:52	W112:03:46	PHOENIX	AZ	FM	268 : 101.5 MHz	C	LIC	176	-0.01	100.00	530	1st Adj	175.99	143
KAHM	N34:41:14	W112:07:01	PRESCOTT	AZ	FM	271 : 102.1 MHz	C	LIC	96	3.84	54.00	770	2nd Adj	99.84	085
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C0	CP	87	4.25	20.00	822	3rd Adj	91.25	266
	N33:46:54	W113:36:42	SALOME	AZ	FM	270 : 101.9 MHz	A	ADD	89	9.66	0.00	0	1st Adj	98.66	203
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C1	LIC	76	15.25	7.10	825	3rd Adj	91.25	266
	N34:33:06	W114:11:37	YUCCA	AZ	FM	266 : 101.1 MHz	C1	ADD	76	15.25	0.00	0	3rd Adj	91.25	266
KJJJ	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	272 : 102.3 MHz	C2	LIC	56	35.25	1.05	814	3rd Adj	91.25	266
KFMS-FM	N36:00:28	W115:00:20	LAS VEGAS	NV	FM	270 : 101.9 MHz	C	LIC	176	50.32	100.00	360	1st Adj	226.32	314
KGCB	N34:41:15	W112:07:02	PRESCOTT	AZ	FM	215 : 90.9 MHz	C	LIC	31	68.81	58.00	772	IF	99.81	085
K269EE	N34:32:27	W112:25:40	PRESCOTT	AZ	FM	269 : 101.7 MHz		LIC	0	71.30	0.08	197	Primary	71.30	096
KNLB	N34:29:10	W114:13:06	LAKE HAVASU CITY	AZ	FM	216 : 91.1 MHz	C3	APP	14	80.27	8.00	138	IF	94.27	262
KAZL	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	CP	76	80.97	57.00	377	3rd Adj	156.97	097
KAZL	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	LIC	76	80.97	77.00	326	3rd Adj	156.97	097
KNLB	N34:29:10	W114:13:06	LAKE HAVASU CITY	AZ	FM	216 : 91.1 MHz	A	APP	12	82.27	3.00	138	IF	94.27	262
KNLB	N34:29:10	W114:13:06	LAKE HAVASU CITY	AZ	FM	216 : 91.1 MHz	A	LIC	12	82.27	1.15	138	IF	94.27	262
K268AC	N35:04:52	W113:54:12	KINGMAN	AZ	FM	268 : 101.5 MHz		LIC	0	83.29	0.01	1083	1st Adj	83.29	310
K270AD	N34:31:27	W114:17:05	LAKE HAVASU CITY	AZ	FM	270 : 101.9 MHz		LIC	0	99.83	0.05	-10	1st Adj	99.83	265

Klein Broadcast Engineering, L.L.C.

Job: ASHFORK,AZ267A.fmj

Master Database: 2002_MAY_31W.fmd

REFERENCE SITE COORDINATES: Lat: N35:16:13 Lon: W112:32:31

Channel: 267 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km

Comments: ENGINEERING EXHIBIT E-4 FM CHANNEL 267 CLASS A at ASH FORK, AZ

(SITE RESTRICTED 7.35km NW of ASH FORK, AZ on a bearing of 314deg.T.)

Description: ENGINEERING EXHIBIT E-4 FM CHANNEL 267 CLASS A at ASH FORK, AZ

(SITE RESTRICTED 7.35km NW of ASH FORK, AZ on a bearing of 314deg.T.)

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rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KAZL	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	CP	133	0.01	57.00	377	1st Adj	133.01	134
KAZL	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	LIC	133	0.01	77.00	326	1st Adj	133.01	134
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C0	CP	152	18.70	20.00	822	1st Adj	170.70	242
	N34:33:06	W114:11:37	YUCCA	AZ	FM	266 : 101.1 MHz	C1	ADD	133	37.70	0.00	0	1st Adj	170.70	242
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C1	LIC	133	37.70	7.10	825	1st Adj	170.70	242
KZON	N33:19:52	W112:03:46	PHOENIX	AZ	FM	268 : 101.5 MHz	C	LIC	165	54.58	100.00	530	1st Adj	219.58	168
KHUL	N37:17:45	W112:50:34	KANAB	UT	FM	266 : 101.1 MHz	C	LIC	165	61.38	100.00	600	1st Adj	226.38	353
DKEPT	N34:32:18	W112:27:58	PRESCOTT	AZ	FM	214 : 90.7 MHz	C2	VAC	15	66.49	0.00	0	IF	81.49	175
None	N34:42:04	W112:07:04	COTTONWOOD	AZ	FM	213 : 90.5 MHz		APP	0	74.07	0.01	0	IF	74.07	148
K265BU	N34:41:13	W112:06:59	COTTONWOOD	AZ	FM	265 : 100.9 MHz		LIC	0	75.48	0.09	811	2nd Adj	75.48	149
K269EE	N34:32:27	W112:25:40	PRESCOTT	AZ	FM	269 : 101.7 MHz		LIC	0	81.59	0.08	197	2nd Adj	81.59	173
K265DN	N35:14:27	W111:35:49	FLAGSTAFF	AZ	FM	265 : 100.9 MHz		LIC	0	86.06	0.01	584	2nd Adj	86.06	092
K214DT	N35:14:26	W111:35:48	FLAGSTAFF	AZ	FM	214 : 90.7 MHz		LIC	0	86.09	0.01	0	IF	86.09	092
K269AR	N35:14:26	W111:35:45	FLAGSTAFF	AZ	FM	269 : 101.7 MHz		LIC	0	86.16	0.04	587	2nd Adj	86.16	092

Klein Broadcast Engineering, L.L.C.
 Job: CHINOVALLEY,AZ232C3.fmj
 Master Database: 2002_MAY_31W.fmd
 REFERENCE SITE COORDINATES: Lat: N34:52:03 Lon: W112:33:04
 Channel: 232 Class: C3

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 100 km

Comments: ENGINEERING EXHIBIT E-5 FM CHANNEL 232 CLASS C3 at CHINO VALLEY, AZ
 (SITE RESTRICTION 14.7km NNW of CHINO VALLEY, AZ on a bearing of 323deg.T.)
 Description: ENGINEERING EXHIBIT E-5 FM CHANNEL 232 CLASS C3 at CHINO VALLEY, AZ
 (SITE RESTRICTED 14.7km NNW of CHINO VALLEY, AZ on a bearing of 323deg.T.)

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
	N34:46:10	W112:31:03	CHINO VALLEY	AZ	FM	232 : 94.3 MHz	A	ADD	142	-130.70	0.00	0	Primary	11.30	164
	N35:52:03	W112:33:04	CHINO VALLEY	AZ	FM	232 : 94.3 MHz	C3	ADD	153	-42.06	0.00	0	Primary	110.94	000 *correction 34-52-03/112-33-04
KMGN	N34:58:08	W111:30:28	FLAGSTAFF	AZ	FM	230 : 93.9 MHz	C	LIC	96	0.00	96.00	460	2nd Adj	96.00	083 FCC notified of incorrect data
KOOL-FM	N33:20:02	W112:03:42	PHOENIX	AZ	FM	233 : 94.5 MHz	C	LIC	176	0.00	100.00	504	1st Adj	176.00	165
KSWG	N33:55:34	W112:47:40	WICKENBURG	AZ	FM	231 : 94.1 MHz	C3	LIC	99	7.80	6.40	197	1st Adj	106.80	192
	N33:57:00	W113:10:30	AGUILA	AZ	FM	231 : 94.1 MHz	C3	ADD	99	17.83	0.00	0	1st Adj	116.83	209
	N35:12:27	W112:37:49	ASH FORK	AZ	FM	285 : 104.9 MHz	A	ADD	12	26.40	0.00	0	IF	38.40	349
KFLG-FM	N35:06:40	W113:53:08	KINGMAN	AZ	FM	234 : 94.7 MHz	C	LIC	96	28.80	46.00	760	2nd Adj	124.80	283
NEW	N34:34:29	W112:28:45	PRESCOTT	AZ	FM	232 : 94.3 MHz	L1	APP	0	33.14	0.00	0	Primary	33.14	169
NEW	N34:32:45	W112:27:34	PRESCOTT	AZ	FM	232 : 94.3 MHz	L1	APP	0	36.66	0.00	0	Primary	36.66	167
NEW	N34:32:38	W112:28:00	PRESCOTT	AZ	FM	232 : 94.3 MHz	L1	APP	0	36.72	0.00	0	Primary	36.72	168
NEW	N34:32:38	W112:28:00	PRESCOTT	AZ	FM	232 : 94.3 MHz	L1	APP	0	36.72	0.00	0	Primary	36.72	168
NEW	N34:33:12	W112:24:53	PRESCOTT	AZ	FM	232 : 94.3 MHz	L1	APP	0	37.02	0.00	0	Primary	37.02	160
	N34:23:27	W110:33:09	OVERGAARD	AZ	FM	232 : 94.3 MHz	C3	ADD	153	37.75	0.00	0	Primary	190.75	106
K285CW	N34:29:20	W112:32:15	PRESCOTT	AZ	FM	285 : 104.9 MHz	LIC	0	42.02	0.05	480	IF	42.02	178	
DK285AC	N34:41:12	W112:06:59	CAMP VERDE	AZ	FM	285 : 104.9 MHz	LIC	0	44.56	0.04	821	IF	44.56	117	
KBUX	N33:40:58	W114:13:59	QUARTZSITE	AZ	FM	232 : 94.3 MHz	A	LIC	142	61.12	0.20	-49	Primary	203.12	230
KFLX	N34:58:06	W111:30:29	KACHINA VILLAGE	AZ	FM	286 : 105.1 MHz	C2	LIC	17	78.97	5.00	444	IF	95.97	083
KMXB	N36:00:30	W115:00:20	HENDERSON	NV	FM	231 : 94.1 MHz	C	CP	176	80.30	100.00	354	1st Adj	256.30	300
KMXB	N36:00:26	W115:00:24	HENDERSON	NV	FM	231 : 94.1 MHz	C	LIC	176	80.33	100.00	369	1st Adj	256.33	300
	N35:31:39	W113:19:49	PEACH SPRINGS	AZ	FM	285 : 104.9 MHz	C3	ADD	14	87.96	0.00	0	IF	101.96	316

Klein Broadcast Engineering, L.L.C.
 Job: GILBERT,AZ280C1207SITE.fmj
 Master Database: 2002_MAY_30W.fmd
 REFERENCE SITE COORDINATES: Lat: N33:25:39 Lon: W111:28:03
 Channel: 280 Class: C1

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 100 km

Comments: ENGINEERING EXHIBIT E-6 FM CHANNEL 280 CLASS C1 GILBERT, AZ (SITE RESTRICTED 29.7km NE of GILBERT,AZ on a bearing of 69deg. T.)
 Description: ENGINEERING EXHIBIT E-6 FM CHANNEL 280 CLASS C1 GILBERT, AZ REFERENCE SITE

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
	N33:25:39	W111:28:03	GILBERT	AZ	FM	280 : 103.9 MHz	C1	ADD	245	-245.00	0.00	0	Primary	0.00	000
KEDJ	N33:23:59	W111:26:45	GILBERT	AZ	FM	280 : 103.9 MHz	C2	APP	224	-220.32	50.00	150	Primary	3.68	147
KEDJ	N33:14:50	W111:31:49	GILBERT	AZ	FM	280 : 103.9 MHz	C2	LIC	224	-203.17	48.00	150	Primary	20.83	196
KFPB	N34:42:52	W112:31:33	CHINO VALLEY	AZ	FM	280 : 103.9 MHz	C3	LIC	211	-38.02	8.10	173	Primary	172.98	326
	N34:20:03	W111:35:31	LAKE MONTEZUMA	AZ	FM	282 : 104.3 MHz	C	ADD	105	-3.78	0.00	0	2nd Adj	101.22	353 *see ENGINEERING STATE ME
KZPT	N32:17:23	W111:01:06	TUCSON	AZ	FM	281 : 104.1 MHz	A	APP	133	0.00	3.00	100	1st Adj	133.00	162
KLNZ	N33:35:33	W112:34:49	GLENDALE	AZ	FM	278 : 103.5 MHz	C	LIC	105	0.00	48.00	740	2nd Adj	105.00	280
KZPT	N32:17:23	W111:01:05	TUCSON	AZ	FM	281 : 104.1 MHz	A	LIC	133	0.01	3.00	31	1st Adj	133.01	162
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	LIC	105	6.25	91.00	326	2nd Adj	111.25	358
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	CP	105	6.25	86.00	600	2nd Adj	111.25	358
KDKB	N33:20:04	W112:03:36	MESA	AZ	FM	227 : 93.3 MHz	C	LIC	41	15.09	96.00	469	IF	56.09	259
	N30:58:57	W110:18:01	CANANEA	SO	FM	280 : 103.9 MHz	B		270	22.60	0.00	0	Primary	292.60	158
	N31:35:30	W112:19:30	SAN FRANCISQUITO	SO	FM	280 : 103.9 MHz	A		196	22.95	0.00	0	Primary	218.95	202
	N35:13:24	W112:36:56	ASH FORK	AZ	FM	280 : 103.9 MHz	A	ADD	200	25.49	0.00	0	Primary	225.49	332
	N35:17:19	W111:38:26	FLAGSTAFF	AZ	FM	279 : 103.7 MHz	C3	VAC	144	63.06	0.00	0	1st Adj	207.06	356
	N32:02:48	W110:42:42	VAIL	AZ	FM	283 : 104.5 MHz	A	ADD	75	93.72	0.00	0	3rd Adj	168.72	155
	N34:27:54	W110:05:26	TAYLOR	AZ	FM	278 : 103.5 MHz	C3	ADD	76	95.60	0.00	0	2nd Adj	171.60	048

Klein Broadcast Engineering, L.L.C.
 Job: LAKEMONTEZUMA,AZ282C.fmj
 Master Database: 2002_MAY_31W.fmd
 REFERENCE SITE COORDINATES: Lat: N34:21:58 Lon: W111:34:26
 Channel: 282 Class: C

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 Date: 5/31/2002 2:39:59 PM
 rfDetective-FM Version 1.3.4

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 100 km

Comments: ENGINEERING EXHIBIT E-7 FM CHANNEL 282 CLASS C at LAKE MONTEZUMA,AZ
 (SITE RESTRICTED 36.4KM SE of LAKE MONTEZUMA, AZ on a bearing of 146deg.T.) (NPR PROPOSED REFERENCE SITE)
 Description: ENGINEERING EXHIBIT E-7 FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ (NPR PROPOSED REFERENCE SITE)
 (SITE RESTRICTED 36.4KM SE of LAKE MONTEZUMA,AZ on a bearing of 146deg.T.)

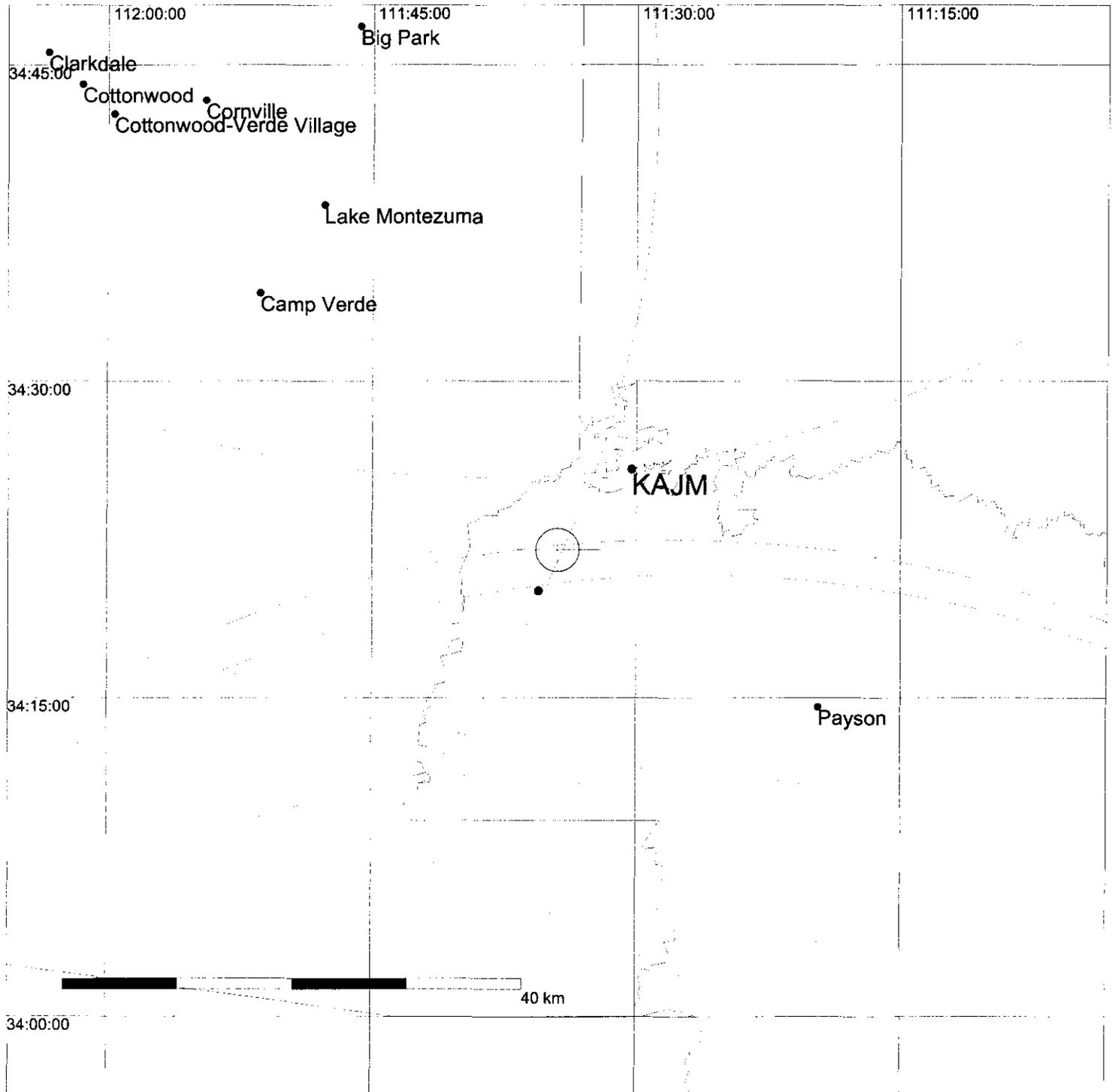
Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
	N34:20:03	W111:35:31	LAKE MONTEZUMA	AZ	FM	282 : 104.3 MHz	C	ADD	290	-286.09	0.00	0	Primary	3.91	205
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	LIC	290	-280.46	91.00	326	Primary	9.54	042
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	CP	290	-280.46	86.00	600	Primary	9.54	042
KFPB	N34:42:52	W112:31:33	CHINO VALLEY	AZ	FM	280 : 103.9 MHz	C3	LIC	96	-0.45	8.10	173	2nd Adj	95.55	294
	N33:25:39	W111:28:03	GILBERT	AZ	FM	280 : 103.9 MHz	C1	ADD	105	-0.43	0.00	0	2nd Adj	104.57	175
KEDJ	N33:23:59	W111:26:45	GILBERT	AZ	FM	280 : 103.9 MHz	C2	APP	105	2.84	50.00	150	2nd Adj	107.84	174
	N35:17:19	W111:38:26	FLAGSTAFF	AZ	FM	279 : 103.7 MHz	C3	VAC	96	6.52	0.00	0	3rd Adj	102.52	357
KZZP	N33:20:04	W112:03:35	MESA	AZ	FM	284 : 104.7 MHz	C	LIC	105	17.95	100.00	472	2nd Adj	122.95	201
KEDJ	N33:14:50	W111:31:49	GILBERT	AZ	FM	280 : 103.9 MHz	C2	LIC	105	19.17	48.00	150	2nd Adj	124.17	178
	N31:51:53	W112:46:30	SONOITA	SO	FM	282 : 104.3 MHz	B		270	29.21	0.00	0	Primary	299.21	202
	N35:12:27	W112:37:49	ASH FORK	AZ	FM	285 : 104.9 MHz	A	ADD	95	39.39	0.00	0	3rd Adj	134.39	314
	N35:13:24	W112:36:56	ASH FORK	AZ	FM	280 : 103.9 MHz	A	ADD	95	39.65	0.00	0	2nd Adj	134.65	315
KZUL-FM	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	283 : 104.5 MHz	C2	LIC	188	53.60	1.05	814	1st Adj	241.60	275
DK285AC	N34:41:12	W112:06:59	CAMP VERDE	AZ	FM	285 : 104.9 MHz		LIC	0	61.20	0.04	821	3rd Adj	61.20	306
KZPT	N32:17:23	W111:01:06	TUCSON	AZ	FM	281 : 104.1 MHz	A	APP	165	71.02	3.00	100	1st Adj	236.02	167
KZPT	N32:17:23	W111:01:05	TUCSON	AZ	FM	281 : 104.1 MHz	A	LIC	165	71.03	3.00	31	1st Adj	236.03	167
	N31:19:49	W110:56:42	NOGALES	SO	FM	282 : 104.3 MHz	B		270	71.78	0.00	0	Primary	341.78	170
K228DF	N34:29:20	W112:32:15	PRESCOTT	AZ	FM	228 : 93.5 MHz		LIC	0	89.62	0.08	486	IF	89.62	279
K285CW	N34:29:20	W112:32:15	PRESCOTT	AZ	FM	285 : 104.9 MHz		LIC	0	89.62	0.05	480	3rd Adj	89.62	279
K280BU	N35:14:27	W111:35:47	FLAGSTAFF	AZ	FM	280 : 103.9 MHz		LIC	0	97.06	0.02	587	2nd Adj	97.06	359

Klein Broadcast Engineering, L.L.C.
Job: LAKEMONTEZUMA,AZ282C.fmj
Master Database: 2002_MAY_31W.fmd
Lat: N34:21:58 Lon: W111:34:26
Scale: 1:500000

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Date: 5/31/2002 3:13:31 PM
rfDetective-FM Version 1.3.4

Channel: 282 Class: C
Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
Range: 100 km : Clearance = FCC
Comments: ENGINEERING EXHIBIT E-7A FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ

(SITE RESTRICTED 36.4km SE of LAKE MONTEZUMA, AZ on a bearing of 146deg.T.)
Description: ENGINEERING EXHIBIT E-7A FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ
(NPR PROPOSED REFERENCE COORDINATES) (SITE RESTRICTED 36.4 km SE
of LAKE MONTEZUMA, AZ on a bearing of 146deg.T.)



Klein Broadcast Engineering, L.L.C.

Job: LAKEMONTEZUMAREFatKAJM.fmj

Master Database: 2002_MAY_31W.fmd

REFERENCE SITE COORDINATES: Lat: N34:25:48 Lon: W111:30:16 (LICENSED SITE of KAJM(FM))

Channel: 282 Class: C

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km

Comments: ENGINEERING EXHIBIT E-8 FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ REFERENCE COORDINATES, LICENSED SITE of KAJM(FM)

Description: ENGINEERING EXHIBIT E-8 FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ REFERENCE COORDINATES, LICENSED SITE of KAJM(FM)
(SITE RESTRICTION: 35.6km SE of LAKE MONTEZUMA, AZ on a bearing of 131deg.T.)

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Sep	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	LIC	290	-290.00	91.00	326	Primary	0.00	000
KAJM	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	CP	290	-290.00	86.00	600	Primary	0.00	000
	N34:20:03	W111:35:31	LAKE MONTEZUMA	AZ	FM	282 : 104.3 MHz	C	ADD	290	-276.67	0.00	0	Primary	13.33	217
	N35:17:19	W111:38:26	FLAGSTAFF	AZ	FM	279 : 103.7 MHz	C3	VAC	96	0.06	0.00	0	3rd Adj	96.06	353
KFPB	N34:42:52	W112:31:33	CHINO VALLEY	AZ	FM	280 : 103.9 MHz	C3	LIC	96	2.89	8.10	173	2nd Adj	98.89	289
	N33:25:39	W111:28:03	GILBERT	AZ	FM	280 : 103.9 MHz	C1	ADD	105	6.25	0.00	0	2nd Adj	111.25	178
KEDJ	N33:23:59	W111:26:45	GILBERT	AZ	FM	280 : 103.9 MHz	C2	APP	105	9.40	50.00	150	2nd Adj	114.40	177
KEDJ	N33:14:50	W111:31:49	GILBERT	AZ	FM	280 : 103.9 MHz	C2	LIC	105	26.21	48.00	150	2nd Adj	131.21	181
KZZP	N33:20:04	W112:03:35	MESA	AZ	FM	284 : 104.7 MHz	C	LIC	105	26.93	100.00	472	2nd Adj	131.93	203
	N31:51:53	W112:46:30	SONOITA	SO	FM	282 : 104.3 MHz	B		270	38.21	0.00	0	Primary	308.21	203
	N35:12:27	W112:37:49	ASH FORK	AZ	FM	285 : 104.9 MHz	A	ADD	95	39.35	0.00	0	3rd Adj	134.35	310
	N35:13:24	W112:36:56	ASH FORK	AZ	FM	280 : 103.9 MHz	A	ADD	95	39.45	0.00	0	2nd Adj	134.45	311
KZUL-FM	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	283 : 104.5 MHz	C2	LIC	188	59.37	1.05	814	1st Adj	247.37	273
DK285AC	N34:41:12	W112:06:59	CAMP VERDE	AZ	FM	285 : 104.9 MHz		LIC	0	62.97	0.04	821	3rd Adj	62.97	297
KZPT	N32:17:23	W111:01:06	TUCSON	AZ	FM	281 : 104.1 MHz	A	APP	165	76.65	3.00	100	1st Adj	241.65	169
KZPT	N32:17:23	W111:01:05	TUCSON	AZ	FM	281 : 104.1 MHz	A	LIC	165	76.65	3.00	31	1st Adj	241.65	169
	N31:19:49	W110:56:42	NOGALES	SO	FM	282 : 104.3 MHz	B		270	77.72	0.00	0	Primary	347.72	171
K280BU	N35:14:27	W111:35:47	FLAGSTAFF	AZ	FM	280 : 103.9 MHz		LIC	0	90.34	0.02	587	2nd Adj	90.34	355
K228DF	N34:29:20	W112:32:15	PRESCOTT	AZ	FM	228 : 93.5 MHz		LIC	0	95.15	0.08	486	IF	95.15	274
K285CW	N34:29:20	W112:32:15	PRESCOTT	AZ	FM	285 : 104.9 MHz		LIC	0	95.15	0.05	480	3rd Adj	95.15	274

Klein Broadcast Engineering, L.L.C.

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REFERENCE SITE COORDINATES: Lat: N34:25:48 Lon: W111:30:16 (LICENSED SITE of KAJM)

Scale: 1:500000

Channel: 282 Class: C

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km : Clearance = FCC

Comments: EXHIBIT E-8A AREA TO LOCATE MAP FM CHANNEL 282 CLASS C at LAKE MONTEZUMA, AZ.

Description: (SITE RESTRICTION 35.6km SE of LAKE MONTEZUMA, AZ on a bearing of 131deg.T.)

Key: Short, Close, Clear, Short/Directional

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Date: 5/31/2002 3:05:32 PM

rfDetective-FM Version 1.3.4

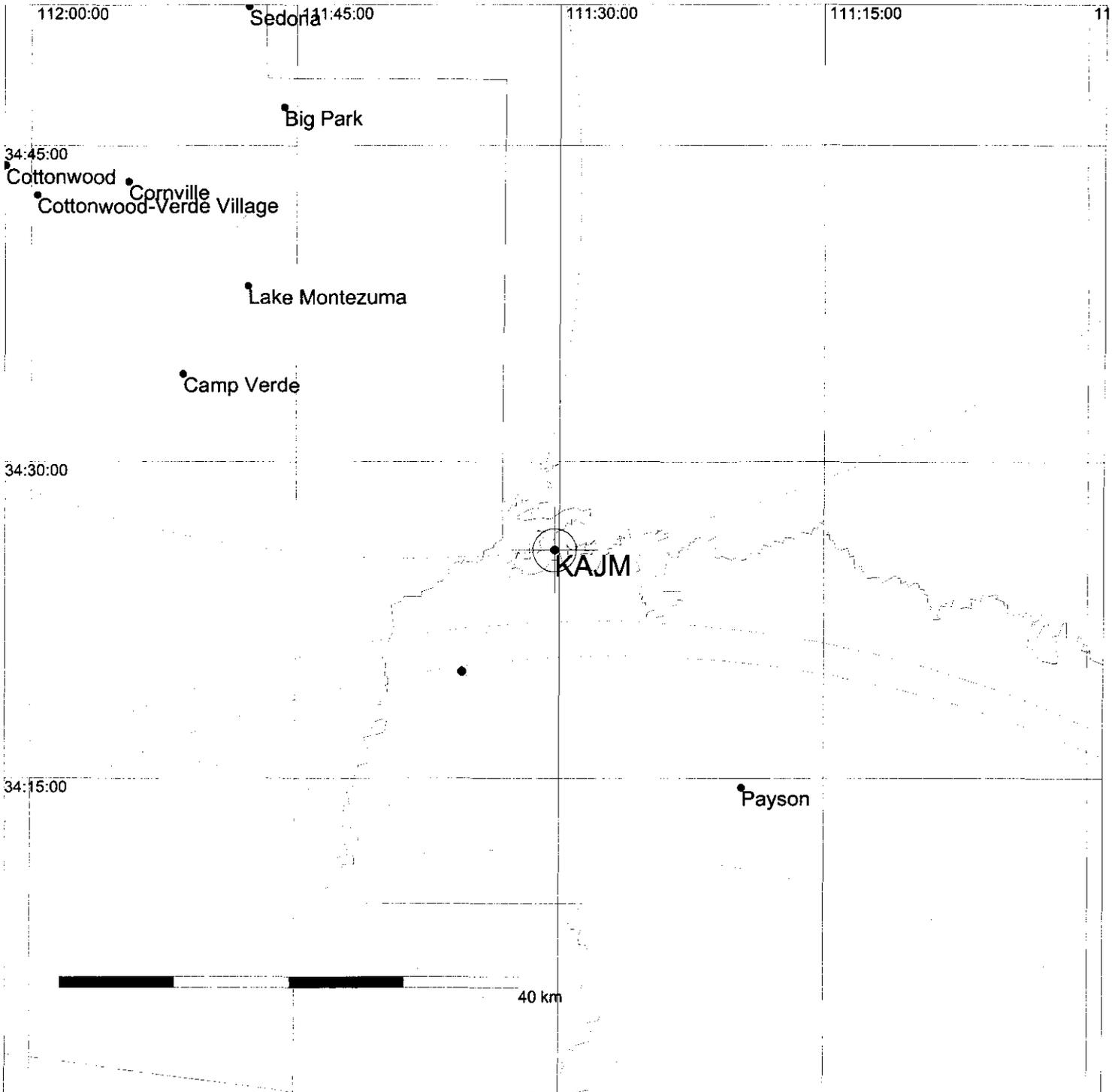


EXHIBIT C

**Station KRXS-FM
Globe, Arizona**

I Linda C. (Potyka) Corso, licensee of Station KRXS-FM, Globe, Arizona, hereby agree to have Station KRXS-FM's channel changed from Channel 247C2 to Channel 231C2, facilities to remain at the present 247C2 site. I will apply to implement the foregoing changes should the Commission so order. I understand that this statement may be used in a filing with the Commission and hereby authorizes its use for that purpose.

I verify that this statement is true, complete and correct to the best of my knowledge and belief and is made in good faith.

Linda C. (Potyka) Corso

By: *Linda C. (Potyka) Corso*
Its: *Licensee*

CERTIFICATE OF SERVICE

I hereby certify that I have this Fourth day of June, 2002, sent a copy of the foregoing **JOINT REPLY COMMENTS** by first class United States mail, postage prepaid, to:

<p>McCody Broadcast Group, Inc. 885 Third Avenue, 34th Floor New York, New York 10022 Petitioner, MM Docket No. 02-73 (Cameron, Arizona)</p>	<p>Scott C. Cinnamon, Esq. Law Offices of Scott C. Cinnamon, PLLC 1090 Vermont Avenue, Northwest, Suite 800 Washington, D.C. 20005 Counsel to Liberty Ventures III, LLC, Petitioner, MM Docket No. 02-12 (Ash Fork, Arizona,)</p>
<p>Linda C. Potyka 1730 East Indigo Street Mesa, Arizona 85203 Licensee, Radio Station KRXS-FM</p>	<p>Denise B. Moline, Esq. PMB No. 215 1212 South Naper Boulevard, No. 119 Naperville, Illinois 60540 Counsel to Tusayan Broadcasting Company, Inc., Licensee, Station KSGC(FM)</p>
<p>Prescott Radio Partners 9222 Loma Street Villa Park, California 92861 Licensee, Radio Station KFPB(FM)</p>	<p>Lee J. Peltzman, Esq. Shainis & Peltzman, Chartered 1850 M Street, Northwest, Suite 240 Washington, D.C. 20036 Counsel to McMurray Communications, Inc., Licensee, Radio Station KXXQ</p>
<p>Harry F. Cole, Esq. Fletcher, Heald & Hildreth PLC 1300 North Seventeenth Street, Eleventh Floor Arlington, Virginia 22209 Counsel to Spectrum Scan, LLC, Counterproposer in MM Docket No. 02-12</p>	<p>Alan C. Campbell, Esq. Irwin, Campbell & Tannenwald, PC 1730 Rhode Island Avenue NorthWest, Suite 200 Washington, D.C. 20036-3101</p>
<p>Mark N. Lipp, Esq. Shook, Hardy & Bacon 600 14th Street, Northwest, Suite 800 Washington, D.C. 20005 Counsel to McMullen Valley Broadcasting Company, Petitioner in MM Docket 01-69</p>	<p>Anne Thomas Paxson, Esq. Borsari & Paxson 2021 L Street, Northwest, Suite 402 Washington, D.C. 20036 Counsel to Farmworker Educational Radio Network, Inc., Counterproposer in MM Docket 01-69</p>

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Movant in MM Docket No. 01-69

Lisa A Blackburn