Exhibit A

Technical Exhibit
by Hatfield & Dawson

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# ENGINEERING STATEMENT

## PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE COMMISSION'S RULES

## TO ASSIGN:
## FM CHANNEL 226C3 FOR USE AT GLADSTONE, OR

## FM CHANNEL 230C2 FOR USE AT PORTLAND, OR

## FM CHANNEL 232C3 FOR USE AT TILLAMOOK, OR

## FM CHANNEL 227C FOR USE AT SPRINGFIELD-EUGENE, OR

## FM CHANNEL 225A FOR USE AT COOS BAY, OR

## FM CHANNEL 224A FOR USE AT LONG BEACH, WA

## FM CHANNEL 228C3 FOR USE AT MANZANITA, OR

## FM CHANNEL 259A FOR USE AT ILWACO, WA

## FM CHANNEL 236A FOR USE AT TROUT LAKE, WA

## PREPARED FOR:
## NEW NORTHWEST BROADCASTERS, LLC

**7/2002**

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## Section I: Description of the Proposed Reallotment Plan

This Engineering Statement has been prepared on behalf of New Northwest Broadcasters, LLC (licensee of stations KAST-FM on Channel 225C1 at Astoria, Oregon, and KAQX-FM on Channel 232A at Long Beach, Washington) ("NNB"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

1) Substitute Channel 226C3 for Channel 225C1 at Astoria, Oregon, reallot Channel 226C3 to Gladstone, Oregon, and modify the license of station KAST-FM to specify operation on Channel 226C3 at Gladstone;
2) Substitute Channel 230C2 for Channel 229C at Portland, Oregon, and modify the license of station KPDQ-FM to specify operation on the new channel;
3) Substitute Channel 232C3 for Channel 231C3 at Tillamook, Oregon, and modify the license of station KTIL-FM to specify operation on the new channel;
4) Substitute Channel 227C for Channel 226C at Springfield-Eugene, Oregon, and modify the license of station KKNU-FM to specify operation on the new channel;
5) Substitute Channel 225A for Channel 228A at Coos Bay, Oregon, and modify the license of station KDCQ-FM to specify operation on the new channel;
6) Substitute Channel 224A for Channel 232A at Long Beach, Washington, and modify the license of station KAQX-FM to specify operation on the new channel;

7) Assign Channel 228C3 for use at Manzanita, Oregon;

8) Assign Channel 259A for use at Ilwaco, Washington;

9) Assign Channel 236A for use at Trout Lake Washington, in lieu of the Channel 226A previously requested for use at that community.

| City | Present | Proposed |
|---|---|---|
| Astoria, OR | 225C1 | —[1] |
| Coos Bay, OR | 228A, 254C2, 290C2 | 225A, 254C2, 290C2 |
| Gladstone, OR | — | 226C3 |
| Manzanita, OR | — | 228C3 |
| Portland, OR | 222C, 229C, 238C, 246C, 254C1, 258C1, 262C, 266C, 270C | 222C, 230C2, 238C, 246C, 254C1, 258C1, 262C, 266C, 270C |
| Springfield-Eugene, OR | 226C | 227C |
| Tillamook, OR | 231C3 | 232C3 |
| Ilwaco, WA | 280C3 | 259A, 280C3 |
| Long Beach, WA | 232A | 224A |
| Trout Lake, WA | — | 236A |

This proposal is being filed as a counterproposal in MB Docket No. 02-136, in which First Broadcasting Company, L.P., and Mid-Columbia Broadcasting, Inc. ("the Initial Petitioners"), have proposed: the reallotment of station KMCQ-FM Channel 283C at The Dalles, Oregon,

[1]Astoria will retain full-time local service from KZNX-FM on Channel 209A, KMUN-FM on Channel 220C2, KKEE-AM on 1230 kHz, and KAST-AM on 1370 kHz.

to Channel 283C3 at Covington, Washington; the allotment of Channel 226A at Trout Lake, Washington; the allotment of Channel 261C2 at Arlington, Oregon; and the allotment of Channel 283C1 at Moro, Oregon.

The instant proposal is mutually exclusive with the Covington proposal in that NNB's proposed allotment of Channel 226C3 at Gladstone, Oregon, conflicts with the Initial Petitioners' proposed allotment of Channel 226A at Trout Lake, Washington. As is further described below, however, NNB has determined that Channel 236A can be assigned for use at Trout Lake in lieu of the Initial Petitioners' requested Channel 226A. Thus, it is possible for the Commission to accommodate both the Initial Petitioners' proposal and NNB's proposal, while still providing a first local service at Trout Lake.

The proposed reallotment plan will provide several benefits:

1) Gladstone, Oregon, an incorporated city with a 2000 Census population of 11,438, will receive its first local service.
2) Manzanita, Oregon, an incorporated city with a 2000 Census population of 564, will receive its first local service.
3) Trout Lake, Washington, a Census Designated Place with a 2000 Census population of 494, will receive its first local service.
4) Ilwaco, Washington, an incorporated city with a 2000 Census population of 950, will receive its second local service.

5) At least 1,737,386 (and possibly as many as 1,738,788) persons will receive an additional aural service.

6) In accommodating the benefits listed above, no white, gray, or populated underserved areas[2] will be created.

**Channel 226C3 at Gladstone, Oregon**

As outlined in the attached channel study, Channel 226C3 can be assigned for use by KAST-FM at Gladstone, Oregon, as the first local service to that community in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 227C is substituted for Channel 226C at Springfield-Eugene, that Channel 230C2 is substituted for Channel 229C at Portland, and that Channel 236A is assigned for use at Trout Lake in lieu of Channel 226A. The coordinates of the proposed allotment site (an existing tower site) are NL 45• 32' 27" x WL 122• 33' 51". This site is 18 kilometers from Gladstone, the coordinates of which are NL 45• 22' 51" x WL 122• 35' 37". The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, and as depicted on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Gladstone.

[2]One unpopulated 2 km² area will be left with 4 remaining aural services.

As outlined in the attached channel study, the proposed allotment of Channel 226C3 at Gladstone is mutually-exclusive with KAST-FM's present assignment on Channel 225C1 at Astoria.

No aural services are presently assigned to Gladstone. The proposed allotment of Channel 226C3 at Gladstone will provide the first local service to that community. Astoria will retain full-time local service from stations KZNX-FM on Channel 209A, KMUN-FM on Channel 220C2, KKEE-AM on 1230 kHz, and KAST-AM on 1370 kHz.

The proposed Channel 226C3 60 dBu service area will contain 1,736,793[3] persons in a 4,808 $km^2$ land area.

**Channel 230C2 at Portland, Oregon**

As outlined in the attached channel study, Channel 230C2 can be assigned for use by KPDQ-FM at Portland, Oregon, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments assuming that Channel 232C3 is substituted for Channel 231C3 at Tillamook. The proposed allotment site coordinates (an existing tower site) are NL 45• 30' 58" x WL 122• 43' 59". This site is located within the City of Portland, and will provide greater than 70 dBu coverage for all of Portland.

[3]All population figures provided in this Engineering Statement have been calculated using the "block centroid" method and Census 2000 data.

The proposed Channel 230C2 60 dBu service area will contain 1,932,974 persons in a 8,569 km² land area.

**Channel 232C3 at Tillamook, Oregon**

As outlined in the attached channel study, Channel 232C3 can be assigned for use by KTIL-FM at Tillamook, Oregon, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 224A is substituted for Channel 232A at Long Beach. The proposed allotment site coordinates are NL 45• 27' 59" x WL 123• 55' 11". This is the site of the licensed KTIL-FM operation, and therefore will continue to provide greater than 70 dBu coverage for all of Tillamook.

The proposed Channel 232C3 60 dBu service area will contain 24,053 persons in a 2,628 km² land area.

**Channel 227C at Springfield-Eugene, Oregon**

As outlined in the attached channel study, Channel 227C can be assigned for use by KKNU-FM at Springfield-Eugene, Oregon, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 225A is substituted for Channel 228A at Coos Bay. The proposed allotment site coordinates are NL 44• 00' 04" x WL 123• 06' 45". This is the site of the licensed KKNU-FM operation, and therefore will continue to provide greater than 70 dBu coverage for all of Springfield-Eugene.

It is noted in this context that the Commission's FM Engineering Database includes an entry for a proposed assignment of Channel 227A at Pacific City, Oregon. That channel was advanced in a counterproposal in MM Docket No. 01-106. Per the Report and Order in that proceeding, however, no channel was assigned for use at Pacific City, and that action is now final. Therefore, the apparent short-spacing to Channel 227A at Pacific City is moot.

It is further noted that the Commission's FM Engineering Database includes entries for proposed assignments of Channels 227A and 227C3 at Madras, Oregon. Those channels were advanced in MM Docket No. 00-87 as potential alternate channels for use at Madras, in lieu of a counterproposal's requested Channel 251C1. Per the Report and Order in that proceeding, however, Channel 251C1 was assigned for use at Madras. Therefore, the apparent short-spacings to Channels 227A and 227C3 at Madras are moot.[4]

[4]The original filing in MM Docket No. 00-87 was a request by Muddy Broadcasting Company ("MBC") for the assignment of Channel 251C3 for use at Brightwood, Oregon. A counterproposal was filed by Madras Broadcasting, seeking the assignment of Channel 251C1 for use at Madras, Oregon, along with other associated changes to the Table of Allotments. In Reply Comments, MBC suggested several alternate channels for use at Madras: Channels 291C1, 291C2, 227C3, 299C3, 293A, and 227A. Of these, only Channel 291C1 was of the same Class as requested by Madras Broadcasting, the only proponent to have stated an intention to apply for the channel at Madras, if allotted. The Report and Order in this proceeding assigned Channel 251C1 for use at Madras, noting that "There are alternate channels available for assignment at Madras, but none are feasible or equivalent to the requested Channel 251C1, and the proponent has stated that it has no interest in a lower class channel...Channel 291C1 would not work because of massive terrain blocking..."

While a Petition for Reconsideration of that decision is pending, the Petition primarily focuses on a claim that Channel 291C1 is indeed suitable for use at Madras, and does not question the Commission's rejection of the other, sub-Class-C1 channels.

The proposed Channel 227C 60 dBu service area will contain 514,392 persons in a 19,875 km² land area (based on the licensed KKNU-FM power and height).

**Channel 225A at Coos Bay, Oregon**

As outlined in the attached channel study, Channel 225A can be assigned for use by KDCQ-FM at Coos Bay, Oregon, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 227C is substituted for Channel 226C at Springfield-Eugene. The proposed allotment site coordinates are NL 43• 21' 15" x WL 124• 14' 34". This is the site of the licensed KDCQ operation, and therefore will continue to provide greater than 70 dBu coverage for all of Coos Bay.

The proposed Channel 225A 60 dBu service area will contain 51,739 persons in a 1,651 km² land area.

**Channel 224A at Long Beach, Washington**

As outlined in the attached channel study, Channel 224A can be assigned for use by KAQX-FM at Long Beach, Washington, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 225C1 at Astoria is reallotted to Gladstone as Channel 226C3. (The assignment of Channel 224A for use at Long Beach is mutually-exclusive with continued operation of KAST-FM on Channel 225C1 at Astoria.) The proposed allotment site coordinates are those of the existing KAQX-FM operation at NL 46• 18' 51" x WL 124• 03' 07". This site is 4 kilometers from Long Beach,

the coordinates of which are NL 46• 21' 09" x WL 124• 03' 11". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, and as depicted on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Long Beach.

The proposed Channel 224A 60 dBu service area will contain 29,580 persons in a 782 km² land area.

**Channel 228C3 at Manzanita, Oregon**

In order to address the loss area created by the reallotment of Channel 225C1 Astoria to Channel 226C3 Gladstone, NNB proposes the allotment of Channel 228C3 at Manzanita, Oregon, as the first local service to that community. No aural services are presently assigned to Manzanita. As outlined in the attached channel study, Channel 228C3 can be assigned for use at Manzanita in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 225C1 at Astoria is reallotted to Gladstone as Channel 226C3, that Channel 230C2 is substituted for Channel 229C at Portland, and that Channel 232C3 is substituted for Channel 231C3 at Tillamook. The coordinates for the City of Manzanita are NL 45• 43' 07" x WL 123• 56' 02". This allotment, however, requires a site restriction 4 km southeast of Manzanita, at NL 45• 41' 05" x WL 123• 54' 38", in order to avoid short-spacing to Channel 228A at Ocean Shores, and to avoid locating the allotment site within Nehalem Bay State Park. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, and as depicted

on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Manzanita.

The proposed Channel 228C3 60 dBu service area will contain 30,735 persons in a 2,667 km² land area.

It is noted in this context that the Commission's FM Engineering Database includes an entry for a proposed assignment of Channel 227A at Pacific City, Oregon, advanced in MM Docket No. 01-106. Per the Report and Order in that proceeding, however, no Channel was assigned for use at Pacific City, and that action is now final. Therefore, the apparent short-spacing to Channel 227A at Pacific City is moot.

NNB hereby expresses its intention to apply for the Manzanita channel, if allotted.

**Channel 259A at Ilwaco, Washington**

In order to address the loss area created by the reallotment of Channel 225C1 Astoria to Channel 226C3 Gladstone, NNB proposes the allotment of Channel 259A at Ilwaco, Washington, as the second local service to that community. Currently, station KVAS-FM on Channel 280C3 is assigned to Ilwaco. As outlined in the attached channel study, Channel 259A can be assigned for use at Ilwaco in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. This allotment can be made at Ilwaco without a site restriction at community coordinates of NL 46• 18' 33" x WL 124• 02'

31". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, and as depicted on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Ilwaco.

The proposed Channel 259A 60 dBu service area will contain 30,032 persons in a 796 km² land area.

NNB hereby expresses its intention to apply for the Ilwaco channel, if allotted.

**Channel 236A at Trout Lake, Washington**

NNB's proposed allotment of Channel 226C3 at Gladstone, Oregon, is mutually-exclusive with the Initial Petitioners' proposed allotment of Channel 226A at Trout Lake, Washington. In order to eliminate this conflict, NNB has identified an alternate channel for use at Trout Lake, which will allow both NNB's and the Initial Petitioners' proposals to be granted, and which will permit the community of Trout Lake to receive its first local service.

As outlined in the attached channel study, Channel 236A can be assigned for use at Trout Lake, Washington, in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. The reference coordinates for Trout Lake are NL 45• 59' 51" x WL 121• 31' 37". This allotment, however, requires a site restriction 6.7 km northwest of Trout Lake, at NL 46• 03' 10" x WL 121• 33' 47". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, and as depicted

on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Trout Lake.

The proposed Channel 236A 60 dBu service area will contain 2,002 persons in a 2,519 km² land area.

NNB hereby expresses its intention to apply for the Trout Lake channel, if allotted.

## Section II: Analysis of Gain and Loss Areas

The reallotment of Channel 225C1 at Astoria to Channel 226C3 at Gladstone will involve a transmitter site change. The gain area directly associated with this modification will encompass 4,808 km² (land area) and a 2000 Census population of 1,737,442 persons. The loss area will encompass 9,902 km² and a 2000 Census population of 160,134 persons.

The substitution of Channel 230C2 for Channel 229C at Portland will involve a transmitter site change. The loss area directly associated with this modification will encompass 10,958 km² (land area) and a 2000 Census population of 364,783 persons. All of this loss area will continue to be well-served, as demonstrated in Section III. There is no gain area directly associated with this modification.

The substitution of Channel 232C3 for Channel 231C3 at Tillamook will not involve a transmitter site change. Therefore, there are no gain or loss areas associated with this modification.

The substitution of Channel 227C for Channel 226C at Springfield-Eugene will not involve a transmitter site change. Therefore, there are no gain or loss areas associated with this modification.

The substitution of Channel 225A for Channel 228A at Coos Bay will not involve a transmitter site change. Therefore, there are no gain or loss areas associated with this modification.

The substitution of Channel 224A for Channel 232A at Long Beach will not involve a transmitter site change. Therefore, there are no gain or loss areas associated with this modification.

The gain area directly associated with the assignment of Channel 228C3 for use at Manzanita will encompass 2,569 km² (land area) and a 2000 Census population of 30,882 persons.

The gain area directly associated with the assignment of Channel 259A for use at Ilwaco will encompass 796 km² (land area) and a 2000 Census population of 30,032 persons.

The gain area directly associated with the assignment of Channel 236A for use at Trout Lake will encompass 2,519 km² (land area) and a 2000 Census population of 2,002 persons.

Many of the individual gain and loss areas described above overlap. Therefore the attached map exhibits at Exhibit D[5] are included to depict the overall gain and loss areas associated with the proposed reallotment taken as a whole.

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[5]Note that these maps do not include depictions of the Tillamook, Coos Bay, Springfield-Eugene, and Long Beach 60 dBu service areas, since the proposed allotment changes at those communities do not involve transmitter site or Class changes.

In calculating the overall gain and loss areas, two scenarios come into play with respect to the proposed Trout Lake Channel 236A allotment.

**Scenario "A":** The Initial Petitioners are unsuccessful in their proposal, and thus station KMCQ-FM remains at The Dalles on Channel 283C and Channel 283C1 cannot be assigned at Moro. Consequently, the entire Trout Lake Channel 236A 60 dBu service area would be counted as gain area.

**Scenario "A" Table of Gain and Loss Areas**

| Service Change | Land Area | Population |
|---|---|---|
| +1 | 7,740 km² | 1,738,788 |
| -1 | 15,417 km² | 355,318 |
| -2 | 1,279 km² | 61,251 |

Taken as a whole, under Scenario "A" the proposed reallotment plan will result in a gain area encompassing 7,740 km² (land area) and a 2000 Census population of 1,738,788 persons, and a loss area encompassing 16,696 km² (land area) and a 2000 Census population of 416,569 persons. Subtracting the loss areas from the gain areas would yield a net population gain of 1,322,219 persons and a net area loss of 8,956 km².

**Scenario "B":** The Initial Petitioners are successful in their proposal, and thus station KMCQ-FM is reassigned to Covington on Channel 283C3 and Channel 283C1 is assigned for use at

Moro. Consequently, only that portion of the Trout Lake Channel 236A 60 dBu service area which overlaps with the Moro Channel 283C1 60 dBu service area would be counted as gain area in evaluating the gains associated with this counterproposal.

**Scenario "B" Table of Gain and Loss Areas**

| Service Change | Land Area | Population |
|---|---|---|
| +1 | 5,520 km² | 1,737,386 |
| -1 | 15,417 km² | 355,318 |
| -2 | 1,279 km² | 61,251 |

Taken as a whole, under Scenario "B" the proposed reallotment plan will result in a gain area encompassing 5,520 km² (land area) and a 2000 Census population of 1,737,386 persons, and a loss area encompassing 16,696 km² (land area) and a 2000 Census population of 416,569 persons. Subtracting the loss areas from the gain areas would yield a net population gain of 1,320,817 persons and a net area loss of 11,176 km².

## Section III: Analysis of White, Gray and Underserved Areas

A detailed study has been undertaken to determine whether the proposed reallotment plan will result in the creation of, or provide new service to, any white, gray, or underserved areas.[6] As is fully described below and illustrated by the attached map exhibits, no white, gray, or populated underserved areas will be created.

Under Scenario "A" (as described in Section II), grant of the proposed reallotment plan will provide additional aural service to 1,704 presently underserved persons in a 2,159 km² area. No white areas will receive additional aural service. An unpopulated gray area of 242 km² will receive an additional aural service.

Under Scenario "B" (as described in Section II), grant of the proposed reallotment plan will provide additional aural service to 410 presently underserved persons in a 152 km² area. No white or gray areas will receive an additional aural service.

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[6]In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

**Gain Areas**

There are three discrete gain areas which will result from approval of the proposed reallotment plan. One of these gain areas is directly associated with the allotment of Channel 226C3 at Gladstone, one with the allotment of Channel 236A at Trout Lake, and one with the allotment of Channel 228C3 at Manzanita.

**Gladstone 226C3:** All of the gain area associated with the allotment of Channel 226C3 at Gladstone is considered to be well-served, receiving at least five aural services. Each of the following stations provides 60 dBu service to 100% of the Gladstone gain area: KGON-FM Channel 222C at Portland, KXJM-FM Channel 238C at Portland, KKSN-FM Channel 246C at Portland, KKRZ-FM Channel 262C at Portland, KINK-FM Channel 270C at Portland, KKCW-FM Channel 277C at Beaverton. In addition, numerous other stations provide service to all or part of the Gladstone gain area.

**Trout Lake 236A:** Analysis of white, gray, and underserved areas within the Trout Lake Channel 236A gain area has been made under both scenarios described in Section II.

Under Scenario "A", an additional aural service will be provided to 1,545 persons in a 2,140 $km^2$ area, of which 242 $km^2$ comprise an unpopulated gray area.

Under Scenario "B", an additional aural service will be provided to 251 persons in a 143 km² area, none of which includes white or gray area.

**Manzanita 228C3:** The allotment of Channel 228C3 at Manzanita will not provide service to any existing white or gray areas, but will provide an additional aural service to 159 presently underserved persons in a 9 km² area.

**Tabulation of Underserved Areas**
**Which Will Gain Additional Service**
**As a Result of Grant of the Instant Proposal**
**(Population per 2000 Census)**

| Gain Area | Number of Existing Services | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Zero Services | | 1 Service | | 2 Services | | 3 Services | | 4 Services | |
| Gladstone | — | --- | --- | — | --- | — | — | — | — | — |
| Manzanita | — | --- | --- | — | --- | — | — | — | 159 pop | 9 km² |
| Trout Lake Scenario "A" | — | --- | 0 pop | 242 km² | 646 pop | 1,388 km² | 503 pop | 248 km² | 396 pop | 262 km² |
| Trout Lake Scenario "B" | — | --- | --- | — | --- | — | 182 pop | 31 km² | 69 pop | 112 km² |

**Loss Areas**

The loss area which will result from approval of the proposed reallotment plan is associated with the allotment changes for stations KAST-FM (currently on Channel 225C1 at Astoria) and KPDQ-FM (currently on Channel 229C at Portland). For the sake of convenience of analysis, the contiguous loss area has been divided into two discrete areas: 1) that portion of the loss area which is within the present KPDQ-FM Channel 229C 60 dBu contour (the "Portland loss area"), and 2) that portion of the loss area which is within the present KAST Channel 225C1 60 dBu contour, but outside the present KPDQ-FM Channel 229C 60 dBu contour (the "Astoria loss area").

All of the Portland loss area will continue to be well-served. Each of the following stations provides 60 dBu service to 100% of the Portland loss area; KGON-FM Channel 222C at Portland, KXJM-FM Channel 238C at Portland, KKSN-FM Channel 246C at Portland, KKRZ-FM Channel 262C at Portland, KINK-FM Channel 270C at Portland, KKCW-FM Channel 277C at Beaverton. Numerous other stations also provide service to this loss area.

Nearly 100% of the Astoria loss area will continue to be well-served. The attached "Astoria Loss Area Study" map exhibit depicts the contours of stations which will continue to provide service to the Astoria loss area. No portion of the Astoria loss area will be left with fewer than five services, with the exception of an unpopulated 2 $km^2$ area which will have four remaining services.

## Section IV: Analysis of need for *Tuck* study

Gladstone is located within the Portland Urbanized Area, and the allotment of Channel 226C3 at Gladstone will provide 70 dBu service to 80% of the land area and 82% of the population of the Portland Urbanized Area. Therefore, a *Tuck* analysis is believed to be required in support of the proposed reallotment plan, and is included in the legal portion of this filing.

Aside from the allotment of Channel 226C3 at Gladstone,[7] no other aspect of the proposed reallotment plan involves changes in service near an Urbanized Area or would result in principal community coverage of 50% or more of an Urbanized Area.

[7]Neither the modification of station KPDQ-FM from Channel 229C to Channel 230C2 at Portland, nor the modification of KKNU-FM from Channel 226C to Channel 227C at Springfield-Eugene, involve a community of license change.

## Section V: Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Astoria, Coos Bay, Gladstone, Manzanita, Portland, Springfield-Eugene, and Tillamook, Oregon; and Ilwaco, Long Beach, and Trout Lake, Washington, has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 29th day of July, 2002.


Benjamin F. Dawson III, P.E.