

substandard class C while KCLS will be a maximum facility class C. The study demonstrates that the proposed allotment is MX with the licensed site of KCLS (Class A and Class C3 application sites on Channel 269) and that it satisfies all spacing requirements. Figure 8 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 9 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 10 is a remaining services map showing that no underserved area is created by the Counterproposal's deletion of channel 269A at Ely. Figure 9 depicts gains since it compares a substandard class C at Pioche (present KBZB licensed facility) with a maximum class C facility (KCLS proposed maximum class C facility).

KHWY

Exhibit E, Figure 11 is an allotment study for the allocation of channel 280B at the licensed site for KHWY Essex, CA. Exhibit E, Figure 12 is an allotment study for the allocation of channel 280B at the permitted site for KHWY Essex, CA. The studies demonstrate that the proposed allotment can be made at the KHWY licensed and permitted sites when the Vacant Channel also at Essex is changed from 280B to 265B. No additional supporting exhibits are included since there will be no change in the KHWY service area.

VAC Ch 280B1 Essex, CA

Exhibit E, Figure 13 is an allocations study showing that channel 280B can be changed to channel 265B at Essex, CA, with no site modification once channel 266C0 (KRRK) is deleted

from Lake Havasu City, AZ. This substitution is necessary to eliminate short spacing to channel 280B at Essex being substituted herein for use by KHWY.

KRRK

Exhibit E, Figure 14 is an allotment study for the allocation of channel 266C at Spring Valley, AZ. The study demonstrates that the proposed allotment is MX with the licensed site of KRRK and that it satisfies all additional spacing requirements once the spectrum channel modifications proposed by the Joint Parties are implemented. Figure 15 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 16 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 17 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 266C0 at Lake Havasu City since KZKE is proposing herein to move to Desert Hills, AZ, on 276C0 at a site very near KRRK's licensed site.

KNRJ

Exhibit E, Figure 18 is an allocations study showing that channel 240C1 (i) can be substituted for channel 266C1 at the licensed site of KNRJ at Payson, AZ and (ii) satisfy all required spacing separations once channel 239C0 (KZGL) at Cottonwood is deleted and reassigned to MX channel 239C3 at Seligman, AZ, and channel 251C is substituted for channel 239C at St. Johns, AZ. No additional supporting exhibits are needed for KNRJ since the coverage will remain the same.

KZGL

Exhibit E, Figure 19 is an allotment study for the allocation of channel 239C3 at Seligman, AZ. The study demonstrates that the proposed allotment is MX with the licensed site of KZGL and that it satisfies all additional spacing requirements. Figure 20 is a 70 dBu contour map for a maximum class C3. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 21 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 22 is a remaining services map showing that no white area is created by deletion of channel 239C0 at Cottonwood.

KWKM

Exhibit E, Figure 23 is an allocations study showing that channel 251C can be substituted for channel 239C at the licensed site of KWKM at St. Johns, AZ and satisfy all required spacing separations since channel 252A at Miami, AZ, was deleted in MB Docket 05-263. No additional supporting exhibits are needed for KWKM since the coverage will remain the same.

VAC 267A Ash Fork

Exhibit E, Figure 24 is an allocations study showing that channel 277A can be substituted for channel 267A at Ash Fork, AZ. The proposed substitution uses the allocations reference site of VAC channel 267A at Ash Fork. This substitution exists only inside the context of the Counterproposal since, as the spectrum currently exists, channel 277A is short spaced to channel 277A (Ch 277C3 CP) at Seligman. After channel 277 is deleted at Seligman, channel 277A at Ash Fork satisfies all required spacing separations with no additional sub changes. No additional

supporting exhibits are needed for the substitution of channel 277A at As Fork since the coverage will remain the same.

KZKE

Exhibit E, Figure 25 is an allotment study for the allocation of channel 276C0 at Desert Hills, AZ for use by KZKE. The study demonstrates that the proposed allotment is MX with the CP authorized site of KZKE and that it meets all additional spacings once the spectrum channel modifications proposed by The Joint Parties are implemented. Figure 26 is a 70 dBu contour map for a maximum class C0. It depicts that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Desert Hills. Figure 27 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 28 is a remaining services map depicting that no white area is created by the instant counterproposal's deletion of channel 277C3 at Seligman.

KFTT

Exhibit E, Figure 29 is an allotment study for the substitution of channel 299A for channel 276C3 at Bagdad, AZ. The study demonstrates that the proposed allotment meets all additional spacing once the spectrum channel modification proposed by The Joint Parties is implemented. Figure 30 is a 70 dBu contour map for a maximum class A. It depicts that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Bagdad. Figure 31 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 32 is a remaining services map depicting that no white area is created by the instant counterproposal's substitution of channel 299A at Bagdad.

KVGS

Exhibit E, Figure 33 is an allotment study for the deletion of channel 300C at Laughlin, NV and its subsequent allocation to Meadview, AZ. The study demonstrates that the proposed allotment satisfies all spacing requirements and gives clear spacing to the substitution of channel 299A at Bagdad (KFTT). Figure 34 is a 70 dBu contour map for a maximum class C. It depicts that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Meadview. Figure 35 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 36 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 300C at Laughlin and showing its allotment to Meadview for use by KVGS.

New CP 285A (Replacement service)

Exhibit E, Figure 37 is an allocation study for the deletion of channel 285A at Cal-Nev-Ari, NV and its subsequent allotment of channel 285C2 at Laughlin, NV. This is a replacement service for KVGS and uses the New CP of channel 285A (at Cal-Nev-Ari) as the authorized facility to allot to Laughlin. However, it does use a different site from that of the New CP at Cal-Nev-Ari as reference. The study demonstrates that the proposed allotment is MX with the authorized CP site of the new service and that it satisfies all spacing requirements once the modification proposed by the Joint Parties is implemented. Figure 38 is a 70 dBu contour map for a maximum class C2. It depicts that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Laughlin. Figure 39 is a gain/loss area map with population counts from the US Census Bureau 2000 census.

VAC Ch 285C3 Peach Springs

Exhibit E, Figure 40 is an allocations study showing that channel 267C3 can be substituted at Peach Springs, AZ for VAC channel 285C3 when its reference site is used. This substitution is created only inside the context of the Counterproposal when channel 267A is deleted at Ash Fork. It satisfies all other required spacing separations, and no additional sub changes are required. Figure 41 is a 70 dBu contour map for a maximum class C3. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 42 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 43 is a remaining services map showing that no white area is created by the Counterproposal's substitution of channel 267C3 for channel 285C3 at Peach Springs.

VAC Ch 267C3 Quartzsite

Exhibit E, Figure 43 is an allocations study showing that channel 267C3 can be substituted for channel 275C3 at the allocations reference site of VAC channel 275C3 at Quartzsite, AZ. This substitution is created only inside the context of the Counterproposal when channel 266C0 is deleted as Lake Havasu City and allocated to Spring Valley, AZ. It satisfies all other required spacing separations. No additional supporting exhibits are needed for this substitution since it proposes to use the existing allotment reference coordinates of channel 275C3; therefore, the potential coverage will remain the same.

New Ch. 276C

Exhibit E, Figure 44 is an allotment study for the placement of channel 276C at the community reference coordinates of Kanab, UT. This allotment eliminates the short spacing between channels 276C at Hurricane and channel 276C0 at Desert Hills, AZ (KZKE). Exhibit E, Figure 45 is a 70 dBu contour map for a maximum class C depicting 100% city grade coverage to the community of Kanab. Therefore, the proposed allotment is in compliance with §73.315 concerning city grade service to the entire community of Kanab. Figure 46 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 47 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 287C at Hurricane.

KONY

Exhibit E, Figure 48 is an allocations study for the allotment of channel 260C to Hurricane, UT as a replacement local service. Channel 260C is used by the licensed KONY. Exhibit E, Figure 49 is a 70 dBu contour map for a maximum class C. It demonstrates compliance with §73.315 concerning 100% city grade service to proposed community of license. No gain/loss map and remaining services studies are included since no technical modifications are proposed for the allotment of channel 260C to Hurricane.

VAC Ch 278C1 Fredonia, AZ

Exhibit E, Figure 50 is an allocations study showing that channel 247C1 can be substituted for channel 278C1 at the allocations reference site of VAC 278C1 at Fredonia, AZ. No additional

supporting exhibits are needed for this substitution since it proposes to use the existing allotment reference coordinates of channel 278C1; therefore, the coverage will remain the same.

VAC 247C First Mesa

Exhibit E, Figure 51 is an allocations study showing that channel 237C can be substituted for channel 247C at the allocations reference site of VAC 247C at First Mesa, AZ. No additional supporting exhibits are needed for this substitution since it proposes to use the existing allocation reference coordinates of channel 247C; therefore, the coverage will remain the same.

New Ch 237C1 Teec Nos Pos

Exhibit E, Figure 52 is an allocations study depicting that channel 278C2 can be substituted for channel 237C1 with a site modification at Teec Nos Pos, AZ. Figure 53 is a 70 dBu contour map for a maximum class C2. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Teec Nos Pos. Figure 54 is a gain/loss area map with population counts from the US Census Bureau 2000 census. No loss area is shown since the permittee of channel 237C1 at Teec Nos Pos proposed to operate channel 237C1 as a very minimal class C1 (100 KW at 50 meters HAAT). The Joint Parties propose to allocate the new channel as a maximum class C2 on channel 278C2. Therefore, since no loss area is developed by the proposed channel and class substitution, a remaining services study is omitted. **THIS IS THE MUTUALLY EXCLUSIVE POINT BETWEEN THE COUNTERPROPOSAL AND THE NPRM.**

VAC Ch 263C3 Paulden

Exhibit E, Figure 55 is an allocations study depicting that channel 228C3 can be substituted for channel 263C3 at Paulden, AZ. The substitution requires a site modification of the channel's reference coordinates. This substitution is an open channel created by the deletion of channel 228C1 at Laughlin, NV and its subsequent allotment to Logandale, UT, in MB Docket 01-135. It satisfies all required spacing separations with no additional sub changes. Figure 56 is a 70 dBu contour map for a maximum class C3. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 57 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 58 is a remaining services map showing that no white area is created by the Counterproposal's substitution of channel 228C3 for channel 263C3 at Paulden.

VAC Ch 280C3 Bagdad

Exhibit E, Figure 59 is an allocations study depicting that channel 290A can be substituted for channel 269C3 at Bagdad's community reference coordinates. This substitution is created by the channel modification of a vacant allotment at Quartzsite, CA and satisfies all other required spacing separations. Figure 60 is a 70 dBu contour map for a maximum class A. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 61 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 62 is a remaining services map showing that no white area is created by the Counterproposal's substitution and site modification of channel 290A in place of channel 269C3 at Bagdad.

VAC Ch 290C2 Quartzsite

Exhibit E, Figure 63 is an allocations study depicting that channel 251C2 can be substituted for channel 290C2 at Quartzsite, AZ. The substitution requires a site modification of the facility's reference coordinates. Channel 251C2 is available at Quartzsite since the Commission dismissed a petition to add channel 252B1 at Parker in MB Docket 05-263. It satisfies all required spacing separations with no additional sub changes. Figure 64 is a 70 dBu contour map for a maximum class C2. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 65 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 66 is a remaining services map showing that no white area is created by the Counterproposal's substitution and site modification of channel 251C2 in place of channel 290C2 at Quartzsite.

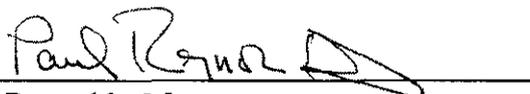
GAIN/LOSS STUDY

Exhibit E, Figure 66 is a composite gain/loss study examining both population and land area changes. It shows that the Counterproposal provides service to 802 persons in a white area, 379 persons in a gray area, a new first local service to three communities totaling 4,702 persons, and a new primary service to 2,583,265 persons. There is a net area gain of 78,723 square kilometers receiving primary service.

CONCLUSION

This engineering statement includes studies clearly documenting that the Counterproposal provides a superior method for obtaining maximum utilization of the spectrum while satisfying all of the current Commission rules concerning FM spectrum modifications. The Counterproposal does not create any white area, and the Counterproposal can be implemented with a minimum of spectrum interruption.

Respectfully Submitted,
REYNOLDS TECHNICAL ASSOCIATES, LLC.


Paul Reynolds, Manager

Reynolds Technical Associates, LLC
12585 Old Highway 280 East
Yellowleaf Creek Landing
Suite 102
Chelsea, AL 35043
205.618.2020

paulr@reynoldstechnical.com

Engineering Statement

In Support of a

Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Summary of Channel Assignments (Depicting all communities, channels, and modifications)

| COMMUNITY | PRESENT | PROPOSED | COMMENTS |
|---|-------------------------------------|-----------------------------|--|
| Ely, NV | 224C3, 269A | 224C3, 256C | Allocate Ch 256C to Ely as community's first wide area service. Delete Ch 269A (KCLS) and allocate MX Ch 268C to Pioche as backfill service for Ch 255C. |
| Pioche, NV | 255C | 268C | Delete Ch 255C (KBZB) at Pioche and allocate Ch 255C at Moapa Valley to accommodate the allotment of Ch 256C at Ely (ADD). |
| Moapa Valley, NV | 224C, 284C1 | 224C, 255C, 284C1 | Allocate Ch 255C at Moapa Valley for use by KBZB. |
| Essex, CA | 255B (KHWY), 280B (VAC) | 280B (KHWY), 265B (VAC) | Delete Channel 255B & substitute Ch 280B for KHWY at its licensed site. |
| Essex, CA | 255B(KHWY), 280B (VAC) | 280B (KHWY), 265B (VAC) | Modify VAC Ch 280B to VAC Ch 265B at its current site.. |
| (Lake Havasu City, AZ) Spring Valley, AZ | 244C2, 266C0, 272C2, 283C2 ----- | 244C2, 272C2, 283C2 266C | Delete Ch 266C0 (KRRK) at Lake Havasu City and allocate Ch 266C to Spring Valley, AZ as first local service. |
| Payson, AZ | 257C3, 266C1, 282C | 227C3, 282C, 240C1 | Substitute Ch 240C1 for Ch 266C1 (KNRJ) at Payson licensed site. |
| Cottonwood, AZ Seligman, AZ | 240C1, 289C3 277C3 | 289C3 239C3 | Delete Channel 240C1 at Cottonwood and allocate MX Ch 239C3 at Seligman (Replacement service). |
| St. Johns, AZ | 239C | 251C | Substitute channel 251C for channel 239C for use by KWKM. |
| Ash Fork, AZ | 267A | 277A | Substitute Ch 277A for Ch 267A at Ch 267A allotment reference. |
| Seligman, AZ Desert Hills, AZ | 277C3 (KZKE) ----- | 239C3 (KZGL) 276C0 | Delete Ch 277C3 (CP) at Seligman and allot MX Ch 276C0 to Desert Hills (first local service). Replacement service at Seligman (KZGL) discussed previously. |
| Bagdad, AZ | 276C3 (KFTT), VAC Ch 269C3 | 299A (KFTT), VAC 290A | Substitute channel 299A for channel 276C3 for use by KFTT. |
| Meadview, AZ | ----- | 300C | Allocate Ch 300C for use by KVGS to Meadview as that community's first local service |

continued

Table 1

**Summary of Channel Assignments
(Depicting all communities, channels, and modifications)**

| | | | |
|---------------------------------|--|---------------------------------|--|
| Laughlin, NV Cal-Nev-Ari | 300C (KVGS) 285A | 285C2 (New.C) | Delete Ch 300C at Laughlin & allocate MX Ch 300C Meadview, AZ (see below) for use by KVGS. Delete Ch 285A at Cal-Nev-Ari, NV and allocate MX Ch 285C2 to Laughlin (for use by New.C) as a replacement service. |
| Peach Springs, AZ | 285C3 (VAC) | 267C3 (VAC) | Substitute Ch 267C3 for VAC Ch 285C3 at Peach Springs using Ch 285C3 allotment coordinates as reference. |
| Quartzsite, AZ | 232A, 275C3 (VAC), 290C2 | 232A, 267C3 (VAC), 251C2 | Substitute Ch 267C3 for VAC Ch 275C3 at Quartzsite using Ch 275C3 allotment coordinates as reference. |
| Kanab, UT | 266C | 266C, 276C | Delete Ch 276C at Hurricane and allocate it to Kanab as a replacement service. Ch 260C as a replacement at Hurricane discussed previously. |
| Hurricane, UT St. George, UT | 276C (New.C) 260C (KONY), 291C2 | 260C (KONY) 291C2 | Delete Ch 260C at St George, UT and allocate to Hurricane as a replacement service. |
| Fredonia, AZ | 278C1 (VAC) | 247C1 (VAC) | Delete Ch 278C1 at Fredonia & substitute channel 247C1 at Ch 278C1 allotment coordinates. |
| First Mesa, AZ | 247C | 237C | Substitute Ch 237C for Ch 247C at the current allocation site. |
| Teec Nos Pos, AZ | 237C1 (New.C) | 278C2 (New.C) | Delete Ch 237C1 at Teec Nos Pos & substitute channel 278C2 with a modification of site coordinates. |
| Paulden, AZ | 263C3 | 228C3 | Substitute Ch 228C3 for Ch 263C3 with an allotment reference site modification. |
| Bagdad, AZ | 269C3 (VAC), 276C3 (KFTT) | 290A (VAC), 299A (KFTT) | Substitute Ch 290A for Ch 269C3 at the city's reference coordinates. |
| Quartzsite, AZ | 232A, 275C3 (VAC), 290C2 | 232A, 267C3 (VAC), 251C2 | Substitute Ch 251C2 for VAC Ch 290C2 at Quartzsite with a modified site. |

Engineering Statement

In Support of a

Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 256C at Ely, NV (ADD 256C)
 Allocating Ch 256C at Ely, NV after deleting Ch 255C at Pioche, NV
 (Using Community of Ely coordinates as reference)

| | | | | | | | |
|---|---------|----------|--|------------------|--------------|--------------|-----------------|
| REFERENCE | | | | | | | DISPLAY DATES |
| 39 14 51 N | | | | CLASS = C | | | DATA 10-11-05 |
| 114 53 16 W | | | | Current Spacings | | | SEARCH 10-16-05 |
| ----- Channel 256 - 99.1 MHz ----- | | | | | | | |
| Call | Channel | Location | | Dist | Azi | FCC | Margin |
| ----- | | | | | | | |
| Community of Pioche | | | | NV 0.0 | 0.0 | | |
| Reference Coordinates: | | | | | | | |
| North Latitude: 39-14-51 | | | | | | | |
| West Longitude: 114-53-16 | | | | | | | |
| KBZB LIC 255C Pioche | | | | NV 152.48 | 169.7 | 241.0 | -88.52 |
| KBZB.C CP 255C Pioche | | | | NV 201.70 | 169.4 | 241.0 | -39.30 |
| Of Concern: | | | | | | | |
| Deletion of Ch 255C at Pioche and | | | | | | | |
| allotment of Ch 255C at Moapa Valley, NV proposed | | | | | | | |
| for use by KBZB. See KBZB below. | | | | | | | |
| AL256 RSV 256C Nephi | | | | UT 290.38 | 77.6 | 290.0 | 0.38 |
| KUDE.C CP 256C Nephi | | | | UT 290.38 | 77.6 | 290.0 | 0.38 |
| KBZB.P PRO 255C Moapa Valley | | | | NV 268.79 | 172.2 | 241.0 | 27.79 |
| Of Note: | | | | | | | |
| Proposed allotment reference of | | | | | | | |
| Ch 255C for use by KBZB at; | | | | | | | |
| NL: 36-50-52, WL: 114-28-37 | | | | | | | |
| KQMR RSV 257C Indian Springs | | | | NV 323.97 | 194.7 | 241.0 | 82.97 |
| KQMR LIC 257C0 Indian Springs | | | | NV 329.89 | 190.6 | 220.0 | 109.89 |
| AL259 VAC 259A Beaver | | | | UT 223.09 | 118.3 | 95.0 | 128.09 |
| ----- | | | | | | | |

White Area Eliminated
Area = 15,943 sq km
Population = 802

Gray Area Eliminated
Area = 5,729 sq km
Population = 395

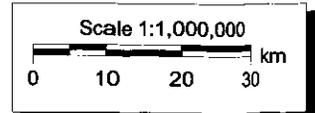
Channel 256C
Ely, NV
White/Gray Area Study

KWPR
KDSS
Channel 276C at Ely, NV

White Area Eliminated

Gray Area Eliminated

Exhibit E, Figure 2



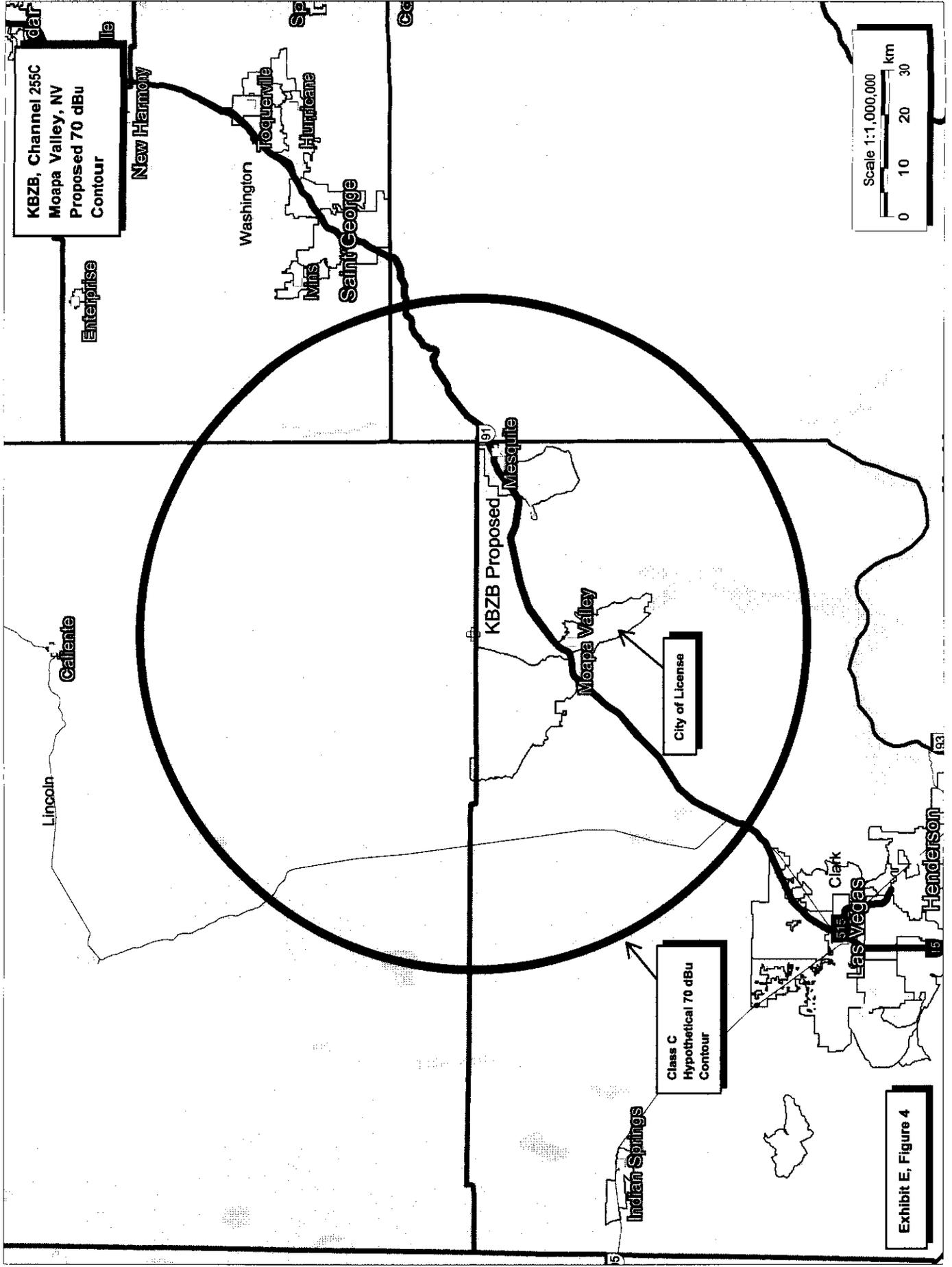
Engineering Statement

In Support of a
Counterproposal
 The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 255C at Moapa Valley (KBZB)
 Deleting Ch 255C at Pioche and allotting to Moapa Valley, NV
 (Using proposed Ch 255C allotment coordinates at Moapa Valley as reference)

| REFERENCE | | | | | DISPLAY DATES | | |
|---|------------|-------------|----------------|-----------|-----------------|----------------|----------------------|
| 36 50 52 N | | | | | DATA 10-11-05 | | |
| 114 28 37 W | | | | | SEARCH 10-16-05 | | |
| ----- Channel 255 - 98.9 MHz ----- | | | | | | | |
| Call | Channel | Location | | Dist | Azi | FCC | Margin |
| ----- | | | | | | | |
| Community of Moapa Valley | | | | NV | 30.38 | 176.8.0 | |
| Reference Coordinates: | | | | | | | |
| North Latitude: 36-34-28 | | | | | | | |
| West Longitude: 114-27-29 | | | | | | | |
| KBZB.C | CP | 255C | Pioche | NV | 68.07 | 0.9 | 290.0 -221.93 |
| KBZB | LIC | 255C | Pioche | NV | 116.63 | 355.6 | 290.0 -173.37 |
| Of No Concern: | | | | | | | |
| Current licensed and CP site of KBZB | | | | | | | |
| KHWY | LIC | 255B | Essex | CA | 224.71 | 193.9 | 274.0 -49.29 |
| KHWY.C | CP | 255B | Essex | CA | 224.71 | 193.9 | 274.0 -49.29 |
| Of Concern: | | | | | | | |
| Change of channel (265B) proposed in | | | | | | | |
| instant counterproposal at KHWY licensed site | | | | | | | |
| KLUCFM | LIC | 253C | Las Vegas | NV | 104.54 | 207.0 | 105.0 -0.46 |
| KQMR | LIC | 257C0 | Indian Springs | NV | 113.46 | 239.4 | 105.0 8.46 |
| KQMR | RSV | 257C | Indian Springs | NV | 128.24 | 248.7 | 105.0 23.24 |
| RDEL | DEL | 255A | Trona | CA | 282.90 | 244.8 | 226.0 56.90 |
| AL255 | VAC | 255A | Trona | CA | 282.90 | 244.8 | 226.0 56.90 |
| KCEP | LIC | 201C2 | Las Vegas | NV | 104.51 | 207.1 | 35.0 69.51 |
| ----- | | | | | | | |



KBZB, Channel 25.5C
 Moapa Valley, NV
 Proposed 70 dBu
 Contour

City of License

Class C
 Hypothetical 70 dBu
 Contour



Exhibit E, Figure 4

Pop. Gain = 265,041
Pop. Loss = 2,116
Gain Area = 22,759 sq km
Loss Area = 12,785 sq km

KBZB, Channel 255C
Moapa Valley, NV
Gain/Loss Study

Loss Area

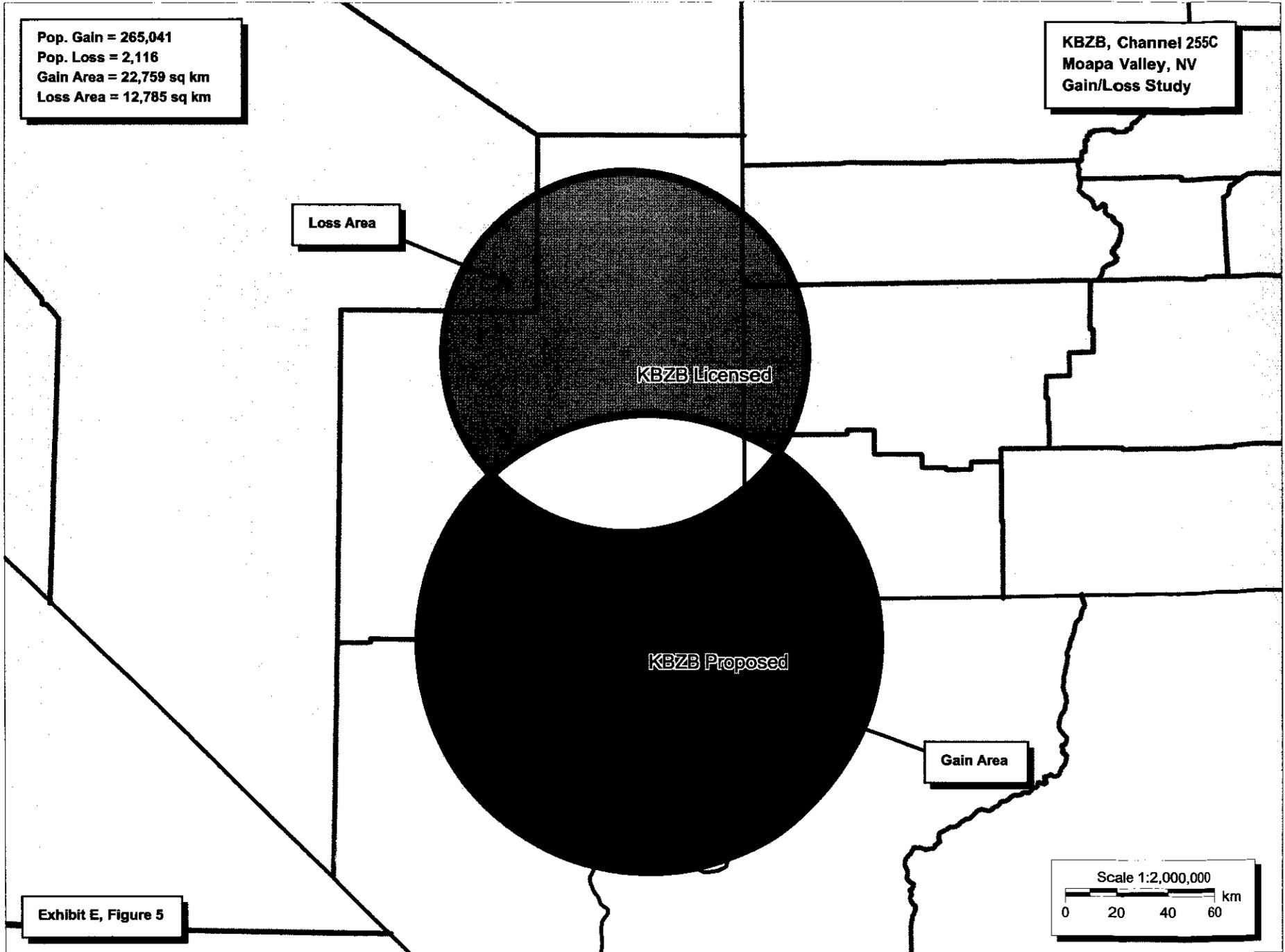
KBZB Licensed

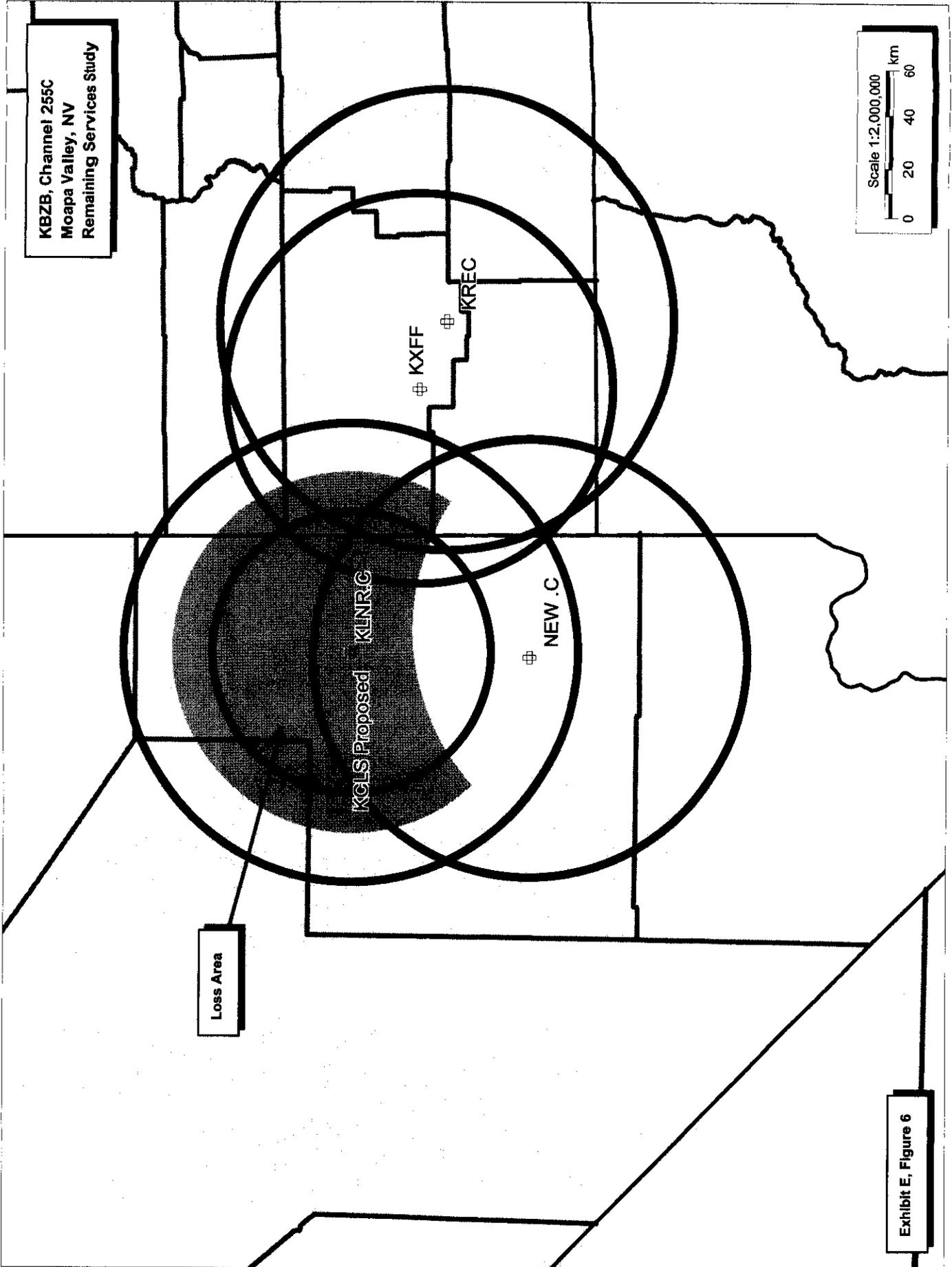
KBZB Proposed

Gain Area

Exhibit E, Figure 5

Scale 1:2,000,000
0 20 40 60 km





KBZB, Channel 255C
Moapa Valley, NV
Remaining Services Study

Scale 1:2,000,000
0 20 40 60 km

Loss Area

Exhibit E, Figure 6

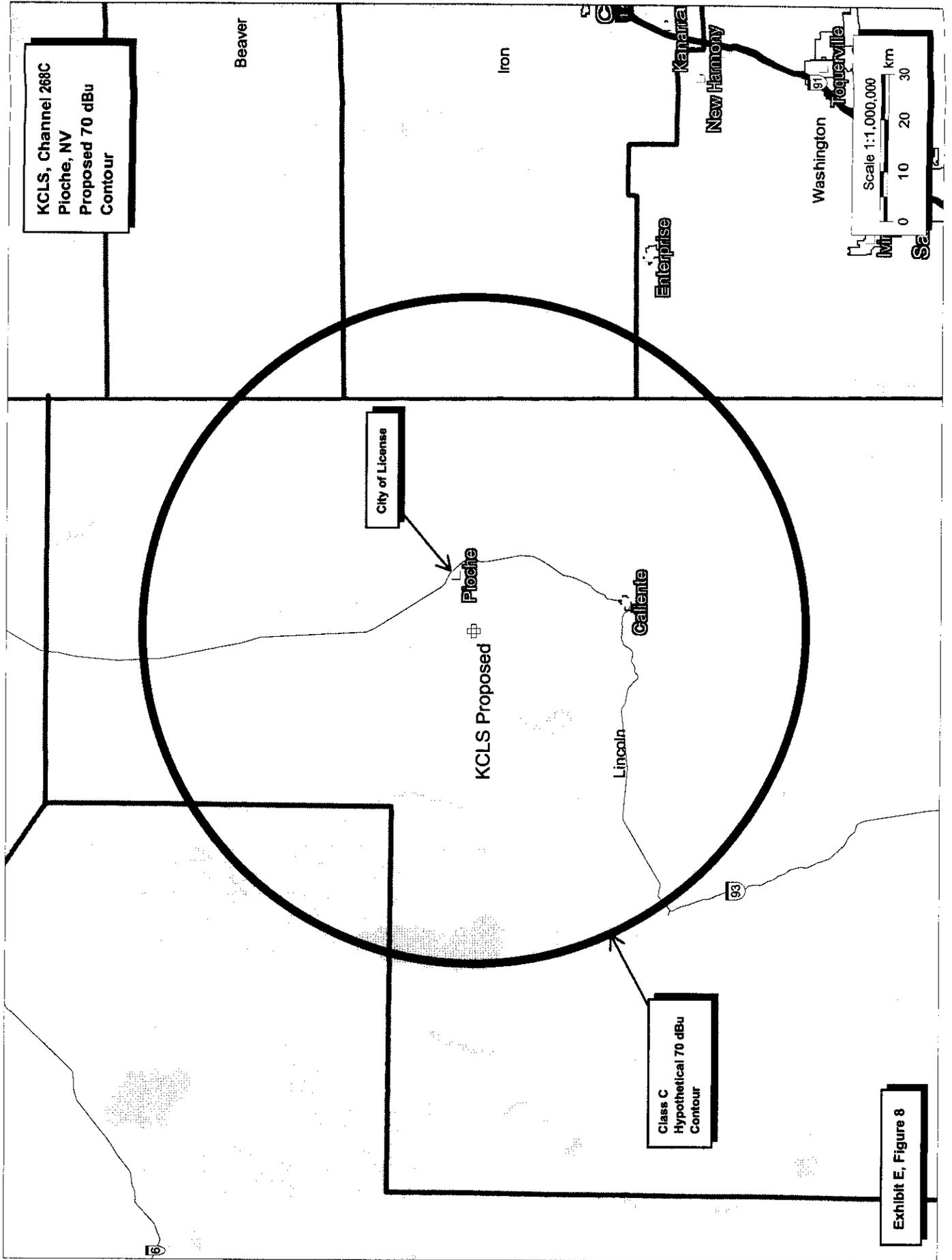
Engineering Statement

In Support of a
Counterproposal
 The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 268C at Pioche, NV (KCLS)
 Deleting Ch 269A (269C3.A) at Ely, NV and allotting Ch 268C to Pioche, NV
 (Using licensed site of KBZB Ch 255C coordinates as reference)

| REFERENCE | | | | | DISPLAY DATES | | |
|---|------------------|--------------|------------------------|------------------|---------------|--------------|---------------|
| 37 53 44 N | CLASS = C | | | | DATA | 10-11-05 | |
| 114 34 41 W | Current Spacings | | | | SEARCH | 10-16-05 | |
| ----- Channel 268 - 101.5 MHz ----- | | | | | | | |
| Call | Channel | Location | | Dist | Azi | FCC | Margin |
| ----- | | | | | | | |
| Community of Pioche | | | | NV 11.78 | 71.3 | | |
| Reference Coordinates: | | | | | | | |
| North Latitude: 37-55-46 | | | | | | | |
| West Longitude: 114-27-04 | | | | | | | |
| KCLS | RSV | 269C3 | Ely | NV 154.41 | 349.9 | 176.0 | -21.59 |
| KCLS.A | APP | 269C3 | Ely | NV 154.44 | 349.9 | 176.0 | -21.56 |
| KCLS | LIC | 269A | Ely | NV 154.41 | 349.9 | 165.0 | -10.59 |
| Of No Concern: | | | | | | | |
| Licensed and CP site of KCLS before modification proposed in instant counterproposal | | | | | | | |
| KIXF | LIC | 268B | Baker | CA 298.26 | 204.1 | 274.0 | 24.26 |
| KPLD | LIC | 266C | Kanab | UT 167.08 | 113.0 | 105.0 | 62.08 |
| KPLD.C | CP -N | 266C | Kanab | UT 167.08 | 113.0 | 105.0 | 62.08 |
| Of Note: | | | | | | | |
| Licensed and CP facility of KPLD Before proposed modification. See below. | | | | | | | |
| KPLD.P | PRO | 266C | Indian Springs | NV 181.69 | 223.0 | 105.0 | 76.69 |
| Of Note: | | | | | | | |
| Proposed modified facility of KPLD at; NL: 36-41-33, WL: 115-58-04 | | | | | | | |
| KPKK.C | CP -N | 266C | Amargosa Valley | NV 187.12 | 221.2 | 105.0 | 82.12 |
| Of Note: | | | | | | | |
| CP site of KRRK before proposed deletion and substitution of Ch 276C. | | | | | | | |
| VAC.P | ADD | 267C3 | Peach Springs | AZ 280.42 | 158.5 | 176.0 | 104.42 |
| Of Note: | | | | | | | |
| Substitution of Ch 267C3 for Ch 285C3 proposed at; NL: 35-31-39, WL: 113-19-49 | | | | | | | |
| KWID | LIC | 270C | Las Vegas | NV 212.87 | 190.4 | 105.0 | 107.87 |
| KPKK | LIC | 266C1 | Amargosa Valley | NV 213.07 | 229.7 | 105.0 | 108.07 |
| ----- | | | | | | | |



KCLS, Channel 288C
 Pioche, NV
 Proposed 70 dBu
 Contour

City of License

Class C
 Hypothetical 70 dBu
 Contour

Exhibit E, Figure 8

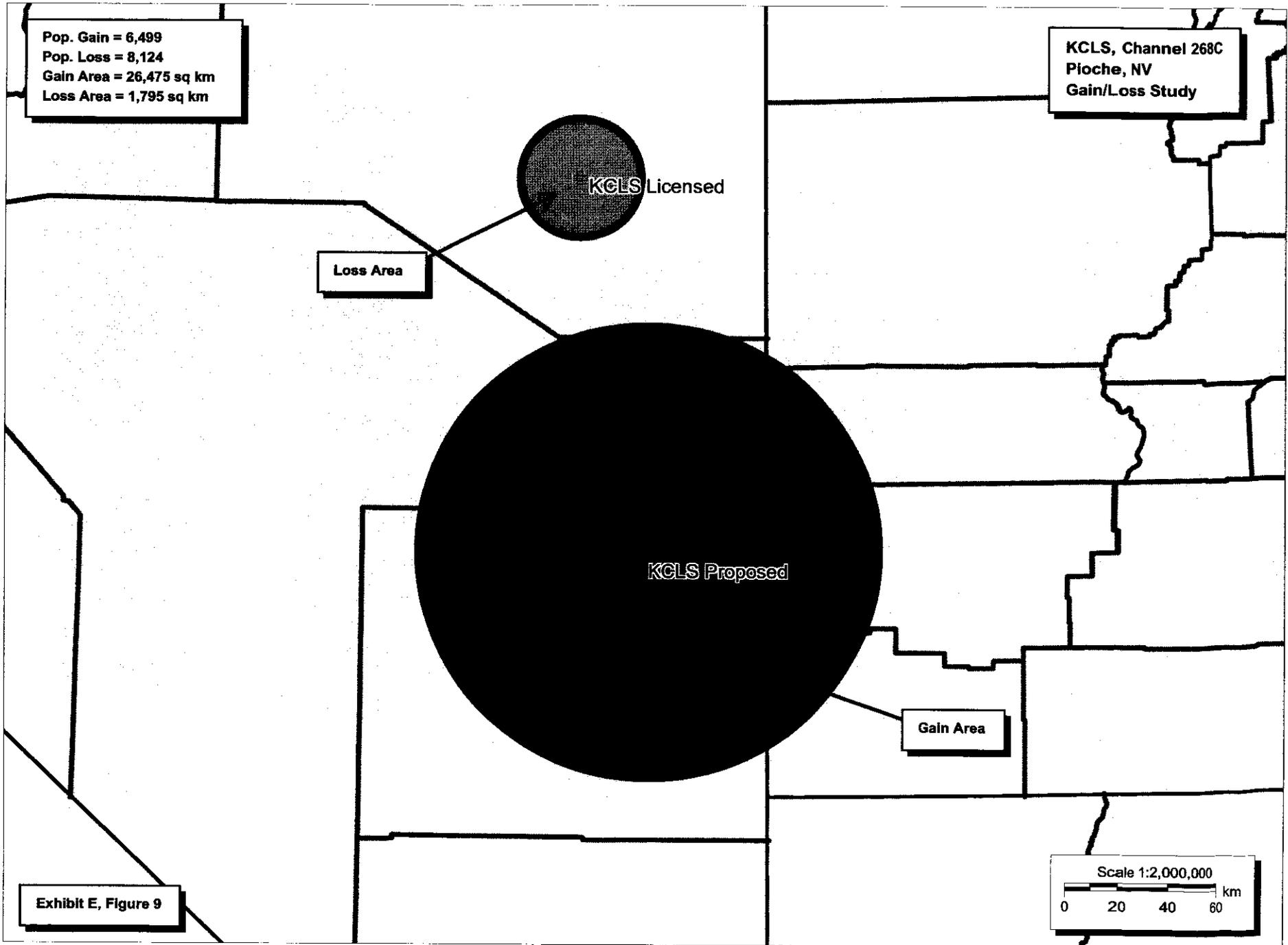
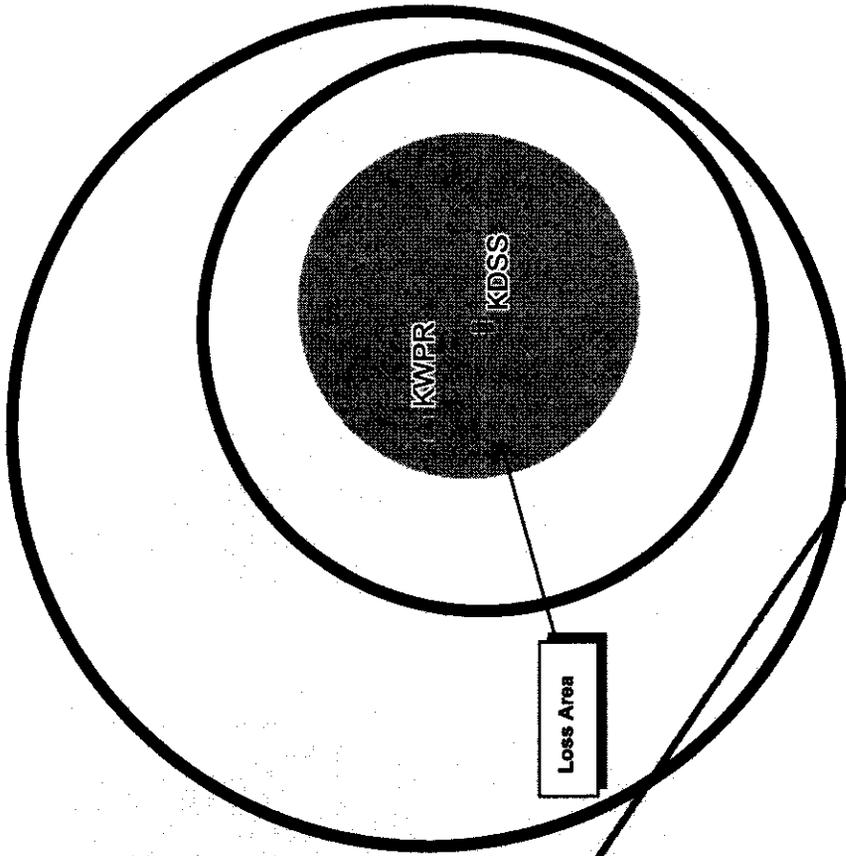


Exhibit E, Figure 9

KCLS, Channel 268C
Pioche, NV
Remaining Services Study



Loss Area

Exhibit E, Figure 10

Engineering Statement

In Support of a
Counterproposal
 The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 280B at Essex, CA (KHWY.L)
 Substituting Ch 280B for Ch 255B at Essex
 (Using KHWY licensed coordinates as reference)

| REFERENCE | | | | | DISPLAY DATES | | | |
|--|------------|-------------|------------------|-----------|-----------------|--------------|--------------|----------------|
| 34 52 50 N | | | | | DATA 10-11-05 | | | |
| 115 04 05 W | | | | | SEARCH 10-17-05 | | | |
| ----- Channel 280 - 103.9 MHz ----- | | | | | | | | |
| Call | Channel | Location | Dist | Azi | FCC | Margin | | |
| ----- | | | | | | | | |
| Community of Essex | | | | CA | 22.90 | 224.6 | | |
| Reference Coordinates: | | | | | | | | |
| North latitude: 34-44-01 | | | | | | | | |
| West Longitude: 115-14-39 | | | | | | | | |
| 950921 | VAC | 280B | Essex | CA | 22.84 | 225.6 | 241.0 | -218.16 |
| Of Concern: | | | | | | | | |
| Substitution of Ch 265B for Vacant (unused) | | | | | | | | |
| Ch 280B proposed at it allotment reference coordinates | | | | | | | | |
| KZULFM | LIC | 283C2 | Lake Havasu City | AZ | 88.02 | 114.3 | 74.0 | 14.02 |
| KISF | LIC | 278C | Las Vegas | NV | 125.22 | 2.6 | 105.0 | 20.22 |
| KJUL | LIC | 282C | North Las Vegas | NV | 126.83 | 342.1 | 105.0 | 21.83 |
| KCXX | LIC | 280A | Lake Arrowhead | CA | 203.25 | 249.8 | 178.0 | 25.25 |
| AL280 | VAC | 280C | Toquerville | UT | 308.49 | 30.8 | 274.0 | 34.49 |
| KEDD.C | CP | 280B1 | Johannesburg | CA | 248.69 | 286.3 | 211.0 | 37.69 |
| KEDD | LIC | 280B1 | Johannesburg | CA | 248.69 | 286.3 | 211.0 | 37.69 |
| XHBAFM | OPE | 281C | Mexicali | BN | 258.71 | 187.9 | 215.0 | 43.71 |
| ALLO | | 281C | Mexicali | BN | 258.71 | 187.9 | 215.0 | 43.71 |
| KIQQFM | LIC | 279A | Newberry Springs | CA | 167.10 | 270.7 | 113.0 | 54.10 |
| ----- | | | | | | | | |

Engineering Statement

In Support of a

Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 280B at Essex, CA (KHWY.C)
Substituting Ch 280B for Ch 255B at Essex
(Using KHWY CP coordinates as reference)

| REFERENCE | | | | CLASS = B | | DISPLAY DATES | | |
|--|------------|-------------|------------------|-------------------------|--------------|---------------|--------------|----------------|
| 34 52 50 N | | | | Current | Spacings | DATA | 10-11-05 | |
| 115 04 06 W | | | | Channel 280 - 103.9 MHz | | SEARCH | 10-17-05 | |
| Call | Channel | Location | | Dist | Azi | FCC | Margin | |
| Community of Essex | | | | CA | 22.50 | 224.5 | | |
| Reference Coordinates: | | | | | | | | |
| North latitude: 34-44-01 | | | | | | | | |
| West Longitude: 115-14-39 | | | | | | | | |
| 950921 | VAC | 280B | Essex | CA | 22.83 | 225.6 | 241.0 | -218.17 |
| Of Concern: | | | | | | | | |
| Substitution of Ch 265B for Vacant (unused) | | | | | | | | |
| Ch 280B proposed at it allotment reference coordinates | | | | | | | | |
| KZULFM | LIC | 283C2 | Lake Havasu City | AZ | 88.04 | 114.3 | 74.0 | 14.04 |
| KISF | LIC | 278C | Las Vegas | NV | 125.22 | 2.6 | 105.0 | 20.22 |
| KJUL | LIC | 282C | North Las Vegas | NV | 126.82 | 342.1 | 105.0 | 21.82 |
| KCXX | LIC | 280A | Lake Arrowhead | CA | 203.23 | 249.8 | 178.0 | 25.23 |
| AL280 | VAC | 280C | Toquerville | UT | 308.50 | 30.8 | 274.0 | 34.50 |
| KEDD.C | CP | 280B1 | Johannesburg | CA | 248.67 | 286.3 | 211.0 | 37.67 |
| KEDD | LIC | 280B1 | Johannesburg | CA | 248.67 | 286.3 | 211.0 | 37.67 |
| XHBAFM | OPE | 281C | Mexicali | BN | 258.70 | 187.9 | 215.0 | 43.70 |
| ALLO | | 281C | Mexicali | BN | 258.70 | 187.9 | 215.0 | 43.70 |
| KIQQFM | LIC | 279A | Newberry Springs | CA | 167.07 | 270.7 | 113.0 | 54.07 |