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February 20, 2013

Honorable Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

FILED/ACCEPTED

FEB 20 2013

Federal Communications Commission  
Office of the Secretary

Attention: Mr. Edward Lubetzky  
Audio Division, Media Bureau

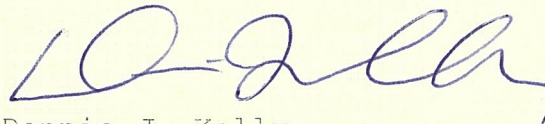
RE: KCEO(AM), Vista, California  
FCC Facility ID # 67666  
File No. BMML-20121016ADQ  
AMENDMENT

Dear Madame Secretary:

On behalf of our client IHR Educational Broadcasting, there is transmitted herewith a further amendment to the above-referenced application for covering license for AM Broadcast Station KCEO, Vista, California. This addresses two matters that were raised in the Commission's letter of December 21, 2012.

Should additional information be desired in connection with the above matter, kindly communicate with this office.

Very truly yours,



Dennis J. Kelly

**AMENDMENT**

February 12, 2013

Honorable Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: KCEO (AM), Vista, California  
FCC Facility ID # 67666  
File No. BMML-20121016ADQ

Dear Madame Secretary:

The above-referenced application of IHR Educational Broadcasting for a covering license for non-commercial educational AM Broadcast Station KCEO, Vista, California, is hereby amended in accordance with the attached material.

Very truly yours,

IHR EDUCATIONAL BROADCASTING

By



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Douglas M. Sherman  
President

insulator shorted to measure the feedline impedance and electrical length from the ATU to the tower as well as at the tower itself with the ATU disconnected. These measurements are documented below and show good agreement with the Westberg theoretical numbers. Each of the towers is of a uniform-cross-section standard triangular construction with three faces of equal width.

The physical tower survey turned up a discrepancy of  $+3^\circ$  for the tower 4 spacing,  $89^\circ$  instead of  $86^\circ$  and a bearing error of  $1^\circ$ . The underlying CP is being modified to account for this difference and this report has been generated using the slightly modified nighttime parameters reflected in the CP Mod. These are less than  $\pm 5\%$  and  $\pm 3^\circ$  from the original construction permit.

The FIM-41 used for the daytime and nighttime measurements was last calibrated by the factory in 2004 but is compared to other similar meters at each station it is used at and has never been more than 1% different. The most recent comparison was in January 2013 with FIM-4100 #250 last calibrated July 27, 2012. When compared, the meters agreed within 0.5%:

<u>Frequency</u>	<u>FIM-41</u>	<u>FIM 4100</u>	<u>% error</u>
670 KHz	92.4 mv/m	92.0 mv/m	+0.43%
1000	254	255	-0.39%
1000	63.7	63.5	+0.32%
1030	0.765	0.762	+0.39%
1570	70.3	70.5	-0.28%

(page amended February 12, 2013 to add tower and new FIM info)