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Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of Application of	)
TRUTH BROADCASTING CORPORATION	) File No. **BPH-20121113AMW**) Facility ID No. 6417
For Construction Permit to Change Community of License of Station KTIA-FM from Boone, IA, to Huxley, IA	)

To: Office of the Secretary
Attention: Chief, Audio Division, Media Bureau

SUPPLEMENT TO INFORMAL OBJECTION

Saga Communications of Iowa, LLC ("Saga")[1], by its attorneys, and pursuant to Section 73.3587[2] of the Commission's Rules, hereby respectfully files this Supplement to Informal Objection against the above-captioned application (FCC File No. BPH-20121113AMW), as amended January 20, 2014,[3] filed by Truth Broadcasting Corporation ("TBC") seeking a minor change construction permit for commercial FM station KTIA-FM, Boone, Iowa.

In its Informal Objection, filed February 19, 2013, Saga showed that TBC's application is a barefaced second attempt to position KTIA-FM for a move into the Des Moines, Iowa radio market, in blatant disregard for the Commission's policy set forth in *Policies to Promote Rural*

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1 Saga is licensee of six commercial radio stations in the Des Moines, Iowa, radio market.

2 Title 47 CFR § 73.3587.

3 The amendment appeared in CDBS on January 22, 2014.

Radio Service and to Streamline Allotment and Assignment Procedures, 26 FCC Rcd 2556 (2011) and Order on Reconsideration, 27 FCC Rcd 12829 (2012) ("Rural Radio"). In a letter to counsel dated December 20, 2013 ("Dismissal Letter"), the Audio Division granted Saga's Informal Objection and dismissed the captioned application. On January 16, 2014, the Audio Division set aside its Dismissal Letter and reinstated the captioned application. This action was followed on January 20, 2014, by TBC's amendment.[4] TBC's amendment reduces the hypothetical center of radiation for KTIA-FM at ASR #1207229, which raises additional issues discussed herein. Saga, once more, urges the Audio Division to dismiss TBC's application because TBC has failed to rebut the presumption that its facility is really designed to serve the urbanized areas of Ames or Des Moines rather than the hamlet of Huxley.[5] In support of Saga's request to dismiss the captioned application, the following is shown:

Background

This proceeding began on November 13, 2012, when TBC filed its captioned application to relocate KTIA-FM from Boone to Huxley, Iowa. As noted above, Saga filed an Informal Objection, arguing that (1) TBC's application should be subject to the rebuttable presumption in Rural Radio and treated as a move-in to the Ames or Des Moines urbanized areas; and (2) in the absence of a rebuttal to the presumption, the relocation of KTIA-FM would not result in a preferential arrangement of allotments. Saga argued that the retention of a fourth local service at Boone under Priority (4) should be preferred over the addition of a 17th local service to the Des Moines urbanized area or a 6th local service to the Ames urbanized area under Priority (4).

4 Having set aside the *Dismissal Letter,* Saga's Informal Objection remains pending, and a Supplement to that Informal Objection is procedurally proper to update the record.

5 Huxley had a population of 3,317 at the 2010 census.

In *Letter to James P. Riley, Esq., and Gary S. Smithwick, Esq.*, (MB June 6, 2013) ("*Deficiency Letter*"), the Audio Division found that neither of the towers identified by Saga could be used to provide 70 dBμ coverage to 50 percent or more of the Ames or Des Moines urbanized areas and at the same time provide a city grade signal to Huxley (herein referred to as "Presumption Criteria"), but identified an additional tower from a KTIA-FM hypothetical facility that would meet the Presumption Criteria. Accordingly, the Audio Division denied Saga's Informal Objection in part and provided a 30-day period for TBC to amend its Section 307(b) showing by rebutting the urbanized area service presumption.[6]

TBC did not amend its Section 307(b)[7] showing as directed by the *Deficiency Letter*. Instead, it filed a Petition for Reconsideration, arguing that the *Deficiency Letter* should be reviewed and reversed because the staff erred in determining that KTIA-FM could operate as Class C3 facility and meet the Presumption Criteria. Saga argued that the TBC Petition was an impermissible request for reconsideration of an interlocutory action under Section 1.106(a) of the Rules, and that, having failed to amend its Section 307(b) showing, the captioned application should be dismissed for failure to prosecute under Section 73.3568 of the Rules. Saga also, in the alternative, suggested the Commission should impose special operating conditions to require TBC to maintain KTIA-FM as a Huxley station (should the Commission grant the application).[8]

In a letter to counsel, DA 13-2437, dated December 20, 2013 ("Dismissal Letter"), the Audio Division dismissed TBC's application because, on further review, the Audio Division's

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6 Saga has consistently argued that ASR #1207229 could be used to meet the Presumption Criteria by considering the possibility of relocating other tower appurtenances at ASR #1207229 in determining the feasibility of a tower structure. The Audio Division refused to consider this possibility. As discussed herein, this was error.

7 Title 47 USC § 307(b), Section 307(b) of the Communications Act of 1934, as amended (the "Act").

8 Although the Commission declined to impose a condition, TBC indicated that it would be willing to accept a less restrictive condition than the one requested by Saga.

staff engineering analysis revealed that at a site previously suggested by Saga, ASR #1207229, KTIA-FM could operate on Channel 257A with a directional antenna and meet the Presumption Criteria.

On December 24, 2013, TBC filed a letter requesting the Chief, Audio Division, to set aside the *Dismissal Letter* under Section 1.113(a) of the Rules, contending that the staff erred in finding that, by use of a directional antenna mounted on ASR #1207229, Station KTIA-FM could meet the Presumption Criteria. TBC claimed the Audio Division's directional pattern (Antenna ID 114555) would not adequately protect KDAO-FM, Eldora, Iowa.

On January 8, 2014, Saga filed a Motion to Strike and Conditional Opposition and Comments, in which Saga submitted a new engineering study showing that a redesigned directional pattern at ASR #1207229 would enable KTIA-FM to protect properly KDAO-FM and meet the Presumption Criteria. In its Opposition to Motion to Strike and Reply to Conditional Comments, filed January 9, 2014, TBC contended that Saga's latest directional pattern from ASR #1207229 is not rule compliant because it violates Section 73.316(b)(2) of the Rules. In a letter dated January 16, 2014, the Chief set aside the *Dismissal Letter,* reinstated the captioned application, and dismissed Saga's Motion to Strike as moot. The Chief indicated there would be "further review of the technical matters" raised in his letter. The purpose of this Supplement is to provide additional information supporting the Audio Division's correct and justified action in dismissing the captioned application. While the Audio Division's design of the directional antenna pattern may have been flawed, the fact remains that ASR #1207229 can be used to provide a hypothetical facility for KTIA-FM that meets the Presumption Criteria, and, as a result, the application must be dismissed.

The Audio Division Was Correct in Dismissing the Captioned Application.

The Audio Division's design for a directional pattern (Antenna ID 114555) described on

page 7 of the *Dismissal Letter* that did not properly protect KDAO-FM does not result in the conclusion that a directional antenna pattern cannot be designed to do so. Attached hereto is an Engineering Report that demonstrates that use of ASR # 1207229 with **"a Directional Antenna Pattern employing a § 73.316(b) rule compliant 15 dB front to back ratio and 2 dB per 10 degree ratio (under the rounding provisions as allowed by the Commission) represents a fully grantable minor change filing option of the KTIA-FM parameters as submitted in BPH-20121113AMW"** [emphasis added.]. Therefore, even though the Division's pattern design was imperfect, the fact remains that KTIA-FM can operate from ASR # 1207229 and meet the Presumptive Criteria. Meeting those criteria means that TBC's captioned application is subject to the urbanized area service presumption, and, accordingly, the application must be dismissed.

TBC's own proposal is fatal. Even assuming *arguendo* that TBC's hypothetical parameters are correct, TBC's hypothetical operation from ASR #1207229 would cover 50% of the Ames, Iowa, urbanized area (when rounding is employed). In its latest amendment, TBC reduced the presumed study height of 352 meters above mean sea level ("AMSL") to 350 meters AMSL. As the Engineering Report states, this was done in an apparent attempt to "keep its predicted Ames, IA, Urbanized Area coverage at a razor-thin 49.73% (which rounds to a nominal 50% already.)" Notwithstanding TBC's attempts to play fast and loose with its Presumptive Criteria showings, Saga show herein that the actual predicted coverage of the Ames, Iowa, urbanized area exceeds 52%, thus supporting the presumption that KTIA-FM intends to serve a large urbanized area, rather than Huxley.

It was Error to Reject ASR #1207229 in the *Deficiency Letter.*

In the *Deficiency Letter*, the Audio Division disagreed with Saga "to consider the possibility of relocating other tower appurtenances at ASR #1207229 in determining the feasibility of a tower

structure." The Division recited the criteria set out in *Rural Radio* that "the Commission specified to consider widely-used techniques, such as directional antennas and contour protection, when certifying that the proposal could not be modified to provide a principal community signal over 50 percent or more of an Urbanized Area." Review of *Rural Radio* (footnote 97)[9] reveals that there is nothing therein that excludes the possibility of relocation of other tower appurtenances from the "widely-used techniques" expected of a proponent.

The Audio Division should state clearly that studies of antenna structures that might meet the Presumption Criteria should be made from the top of such structures without any regard to the appurtenances thereon. This is because the Commission is seeking **hypothetical** sites, not actually buildable sites. There is no requirement that an applicant, seeking to rebut the urbanized area presumption, needs to have "reasonable assurance" of the availability or suitability of a tower structure. Maintaining the position taken by the Audio Division in the *Deficiency Letter* will open the way to gaming the system (as, indeed, TBC has done) by specifying an antenna configuration that will not fit within the apertures of existing towers. As set forth in detail in the attached Engineering Report, if the Audio Division has adopted such a restriction, it should disavow it, as it opens the door to the potential for abuse. A proponent, in order to avoid the presumption, could propose an antenna with so many bays that it would be too large to fit on the proposed tower, where a one-bay antenna could be accommodated.

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9 *Rural Radio* footnote 97 provides: "Specifically, a proponent would need to certify that there could be no rule-compliant minor modification on the proposed channel to provide a principal community signal over 50 percent or more of an Urbanized Area, in addition to covering the proposed community of license. In doing so, proponents will be required to consider all existing registered towers in the Commission's Antenna Structure Registration database, in addition to any unregistered towers currently used by licensed radio stations. Furthermore, we expect all applicants and allotment proponents to consider widely-used techniques, such as directional antennas and contour protection, when certifying that the proposal could not be modified to provide a principal community signal over the community of license and 50 percent or more of an Urbanized Area. While this is not a conclusive test, it is one that the Commission will treat as establishing a rebuttable presumption of an allotment that could not be modified to serve both the majority of an Urbanized Area and the community of license."

The source of the Audio Division's error is a quotation from the statement of William J. Getz of Carl T. Jones Corporation, technical consultant to TBS, noted at p. 2 of TBS's March 18, 2013, "Opposition to Informal Objection" where Mr. Getz states, "The Truth Study [of ASR #1207229] actually considered the *applicant's antenna* as required by *Rural Radio*... " The Audio Division apparently picked up on this, and interpreted the sentence to limit consideration of hypothetical towers to structures where the antenna configuration proposed by the applicant could be mounted. That interpretation would exclude the possibility of relocation of other tower appurtenances when considering towers from which the Presumptive Criteria could be met.

If the Audio Division intended to announce a change in policy in its *Dismissal Letter,* the change should be promptly reversed. In its decision on the captioned application, the Audio Division should reject this limitation. The Audio Division is considering hypothetical towers from whence the proponent's facility will never operate. In light of this, the Audio Division should direct proponents to run their studies from the top of each viable tower without regard to existing aperture space or appurtenances on the tower. As the Engineering Report notes, such a policy would remove" the potential for abuse and is more easily replicable by all parties involved."

Finally, the Audio Division should revisit Saga's request to impose a condition on any construction permit that it might issue restricting any future moves by KTIA-FM to preclude service of the Ames or Des Moines urbanized areas. Although the *Dismissal Letter* remarks, "As a preliminary matter, we are unaware of any precedent for the imposition of such conditions," the lack of such precedent does not prevent the Commission from imposing such a condition to protect the precepts set forth in *Rural Radio,* and Saga renews its request for the imposition of such a condition.[10]

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10 Conditions have been imposed in the Noncommercial Educational service. See *Albert J. Catalano, Esq.*, 27 FCC Rcd 2109 (2012) ("NTC's permit bore a condition requiring construction substantially as proposed with no

Conclusion

In light of the foregoing, Saga respectfully requests the Commission to again dismiss the captioned TBC application for failure to comply with the policies of *Rural Radio*, and this time, dismiss it with prejudice.

Respectfully submitted,

SAGA COMMUNICATIONS OF IOWA, LLC

By: _____
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January 23, 2014

downgrade to 'the area' upon which the preference was based for a period of four years of on-air operations.")

ATTACHMENT

ENGINEERING REPORT

ENGINEERING REPORT

Section 307(b) Presumptive
Urbanized Area Preclusion Study

Ames, IA Urbanized Area
Coverage from ASR #1207229

KTIA-FM – Huxley, IA
Channel 257A – 99.3 MHz
(Facility ID No. 6417)

Engineering Statement & Report to Support a
"Supplement to Informal Objection"

CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

January 23, 2014

By Wayne S. Reese
Wayne S. Reese, President

By Justin W. Asher
Justin W. Asher, Project Engineer

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Coldwater, Michigan 49036

Telephone: 517-278-7339

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Supplemental HAAT Data:

N. Lat. = 415529 W. Lng. = 933449
HAAT and Distance to Contour,
FCC, FM 2-10 Mi, 51 pts Method - NED 03 SEC

Azi.	AV EL	HAAT	ERP kW	dBk	Field	70-F5	60-F5
000	284.1	67.9	3.2679	5.14	0.738	11.46	20.52
045	290.3	61.7	0.6455	-1.90	0.328	7.22	12.91
090	282.8	69.2	1.5852	2.00	0.514	9.69	17.19
135	259.5	92.5	6.0000	7.78	1.000	15.43	27.27
180	303.6	48.4	6.0000	7.78	1.000	11.31	20.24
225	309.8	42.2	6.0000	7.78	1.000	10.53	18.80
270	315.5	36.5	6.0000	7.78	1.000	9.79	17.40
315	308.5	43.5	6.0000	7.78	1.000	10.70	19.12

Ave El= 294.26 M HAAT= 57.74 M AMSL= 352 M

The table above shows the distances to the 3.16 mV/m and 1.0 mV/m contours from the proposed Section 307(b) Presumptive Urbanized Area Preclusion Study facility using an ERP of 6.0 kW at an HAAT of 58 meters. These distances have been calculated based on the FCC F(50-50) curves.

DISCUSSION OF REPORT

This firm was retained to prepare this engineering report in support of a "Supplement to Informal Objection" and further Section 307(b) Presumptive Urbanized Area Preclusion Study against KTIA-FM – Boone, IA to Huxley, IA (CH257A) pending application BPH-20121113AMW (as amended 01/03/2013 and further amended 01/22/2014) filed by Truth Broadcasting Corp ("Truth"). The KTIA-FM application was originally opposed by Saga Broadcasting of Iowa, LLC ("Saga"). This further Presumptive Preclusion Study is in response to a recent January 16, 2014 letter (the "*Reinstatement Letter*") in which KTIA-FM application BPH-20121113AMW was reinstated under pending review of technical matters raised therein.

History. Previous Commission letters first disavowed Saga's use of ASR #1207229 for Class A, objection based, Presumptive Preclusion Showings by stating Saga's presumed (hypothetical) study height of 370 meters AMSL on the 371.5 meter AMSL tower (255 ft AGL on the 260 ft AGL tower) would require the relocation of other appurtenances currently occupying this height. In essence, the Commission set forth a modified "*reasonable site assurance*" precedent that hypothetical Presumptive Preclusion Showings not only be limited to existing ASR Towers (or other non-registered towers housing licensed aural services), but also be limited to the available aperture space on the tower studied. In this instance, Truth originally specified a presumed study height of 352 meters AMSL on the 371.5 meter AMSL tower (195 ft AGL on the 260 ft AGL tower). Truth now attempts to change the bar (in its 01/22/2014 Amendment) by further lowering the study height to 350 meters AMSL on the 371.5 meter AMSL tower (190 ft AGL on the 260 ft AGL tower). Truth backs this up with a statement that the tower owner assures a reasonable site aperture of 175 ft to 205 ft AGL on ASR #1207229. Truth also continues to employ the vertical requirements of an arbitrary 4-Bay antenna as opposed to a worst-case 1-bay antenna. *It should be noted this new "reasonable site assurance policy" opens the Commission for ripe abuse as future applicants may now specify a Presumptive Preclusion Study (based on an arbitrary multi-bay antenna) which may artificially preclude or lower the study height of otherwise viable towers. Case-in-point is Truth's 01/22/2014 Amendment which has already inched down its study height from 352 meters AMSL to 350 meters AMSL in order to keep its predicted Ames, IA Urbanized Area coverage at a razor-thin 49.73% (which rounds to a nominal 50% already)*[1] *. An actual predicted coverage scenario of the Ames, IA Urbanized Area in excess of 52% has been documented below.*

Revised Presumptive Preclusion Study. This report identifies and clarifies use of ASR No. 1207229 which will allow for more than 50% coverage of the Ames, IA Urbanized Area while maintaining 70 dBμ service to Huxley, IA. Operation from ASR No. 1207229 would require §73.215 short-spaced processing toward two facilities and require the use of a directional antenna. However, the Presumptive Operation would remain wholly rule compliant allowing for Class A parameters of 6.0 kW at 352 meters AMSL. *The preparer acknowledges Truth's aforementioned attempt to revise the study height of 352 meters AMSL to 350 meters AMSL. However as the Commission has tentatively accepted a study height of 352 meters AMSL, this height will be maintained here-in. The preparer respectfully requests an allowance to revise study results should the Commission further revise it accepted height.*

The Presumptive Preclusion Study service contours have been calculated in accordance with the Rules. The data obtained has been tabulated and plotted in this report. The plotted service contours are found in ***Exhibit 1.1*** of this report. This exhibit shows the overall service provided by the 3.16 mV/m (70.0 dBμ) contour which serves 52.3% of the land area of the Ames, IA Urbanized Area. The community of Huxley, IA resides well within the 70.0 dBμ service contour. Community coverage of Huxley, IA has also been documented in ***Exhibit 1.1***.

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[1] *Supplemental Statement (January 2014 Amendment)*, KTIA-FM (Facility ID: 6417) Pending Application BPH-20121113AMW (As Amended 01/22/2014); Attachment 1; Exhibit 1.

DISCUSSION OF REPORT (continued)

Use of this tower and a Directional Antenna Pattern employing a §73.316(b) rule compliant 15 dB front to back ratio and 2 dB per 10 degree ratio (under the rounding provisions as allowed by the Commission) represents a fully grantable minor change filing option of the KTIA-FM parameters as submitted in BPH-20121113AMW. As a result, a presumption can be made that a grant of the KTIA-FM proposal could allow the addition of yet another transmission service to an urbanized area at the expense of the removal of an existing rural service. Therefore, public interest would be better served by retention of KTIA-FM as an existing fourth aural service to Boone, IA as opposed to the potential addition of at least the 6th local service[2] to the Ames, IA Urbanized Area.

The tabulation of the distances to the respective contours shown in this discussion is based on the use of the standard eight cardinal bearings, which were also used for the computation of the HAAT. However, the plotted contours shown in ***Exhibit 1.1*** are based on the use of a full 360 terrain radials. The applicant would like to note the use of the NED 03 Second terrain database for all allocation, contour and HAAT calculations contained here-in.

As stated before, this Presumptive Urbanized Area Preclusion Study assumes a hypothetical operation from the existing tower bearing Antenna Structure Registration Number 1207229. A copy of the existing ASR has been included in ***Exhibit 1.2***. The top of ASR 1207229 is listed at 371.5 meters AMSL. Max Class A parameters are not achievable at this tower height, however Class A parameters of 6.0 kW at 58 meters HAAT may be achieved with a CH257A antenna COR of 352 meters AMSL. Therefore, no modification of the existing ASR structure would be required for this hypothetical CH257A operation.

The proposed Presumptive Urbanized Area Preclusion site for the CH257A Class A operation meets all domestic spacing requirements of 47 C.F.R. §73.207 toward other stations in the allocation with the exception of KDAO-FM – Eldora, IA and KSKB(FM) – Brooklyn, IA. A tabulation of the existing and required spacing toward each of the other relevant stations is found in ***Exhibit 3.1.*** Short-spaced processing under §73.215 is allowable towards KDAO-FM and KSKB(FM). Individual contour protection studies towards these stations have been included in ***Exhibit(s) 3.2*** and ***3.3***. Concerning allocation protection KPUL(FM) – Winterset, IA (CH258A), an involuntary channel substitution for KPUL(FM) - Winterset, IA (CH258A to CH269A) is being proposed pursuant to KTIA-FM application BPH-20121113AMW. Therefore, the KPUL(FM) CH258A facility need not be protected for purposes of this Section 307(b) Presumptive Preclusion Study.

A directional antenna will be necessary for the §73.215 short-spaced protections, therefore a copy of the rule compliant directional antenna pattern has been included in ***Exhibit 3.4*** and also below. As noted previously, compliance with §73.316(b) has been maintained concerning the 15 dB front to back ratio and 2 dB per 10 degree ratio(s) under the rounding provisions as allowed by the Commission. Supplemental dB per 10 degree calculations have been included in ***Exhibit 3.4*** as well as here-in. Inspection of each 10 degree increment will yield nominal values of 2 dB per 10 degrees. Values in excess of 2 dB per 10 degrees remain *de minimis* in nature and therefore allowable under §73.316(b).

[2] Information concerning the existing six (6) local services to the Ames, IA Urbanized Area (all licensed directly to Ames, IA) has been taken directly from the FCC's Consolidated Database System (CDBS) internet based public search function and is a matter of public record before the Commission.

DISCUSSION OF REPORT (continued)

Copy of DA Pattern Tabulation (continued):

PROPOSED PRECLUSION PATTERN (See also ***Exhibit 3.4***)

° True	Relative Field	dB/10°	dBk	Equivalent Power (kW)	° True	Relative Field	dB/10°	dBk	Equivalent Power (kW)
0°	0.738	-2.046	5.143	3.268	180°	1.000	0.000	7.782	6.000
10°	0.583	-2.048	3.095	2.039	190°	1.000	0.000	7.782	6.000
20°	0.461	-2.039	1.056	1.275	200°	1.000	0.000	7.782	6.000
30°	0.365	-2.028	-0.973	0.799	210°	1.000	0.000	7.782	6.000
40°	0.332	-0.823	-1.796	0.661	220°	1.000	0.000	7.782	6.000
50°	0.324	-0.212	-2.008	0.630	230°	1.000	0.000	7.782	6.000
60°	0.324	0.000	-2.008	0.630	240°	1.000	0.000	7.782	6.000
70°	0.364	1.011	-0.996	0.795	250°	1.000	0.000	7.782	6.000
80°	0.408	0.991	-0.005	0.999	260°	1.000	0.000	7.782	6.000
90°	0.514	2.006	2.001	1.585	270°	1.000	0.000	7.782	6.000
100°	0.647	1.999	4.000	2.512	280°	1.000	0.000	7.782	6.000
110°	0.815	2.005	6.005	3.985	290°	1.000	0.000	7.782	6.000
120°	1.000	1.777	7.782	6.000	300°	1.000	0.000	7.782	6.000
130°	1.000	0.000	7.782	6.000	310°	1.000	0.000	7.782	6.000
140°	1.000	0.000	7.782	6.000	320°	1.000	0.000	7.782	6.000
150°	1.000	0.000	7.782	6.000	330°	1.000	0.000	7.782	6.000
160°	1.000	0.000	7.782	6.000	340°	1.000	0.000	7.782	6.000
170°	1.000	0.000	7.782	6.000	350°	0.934	-0.593	7.188	5.234

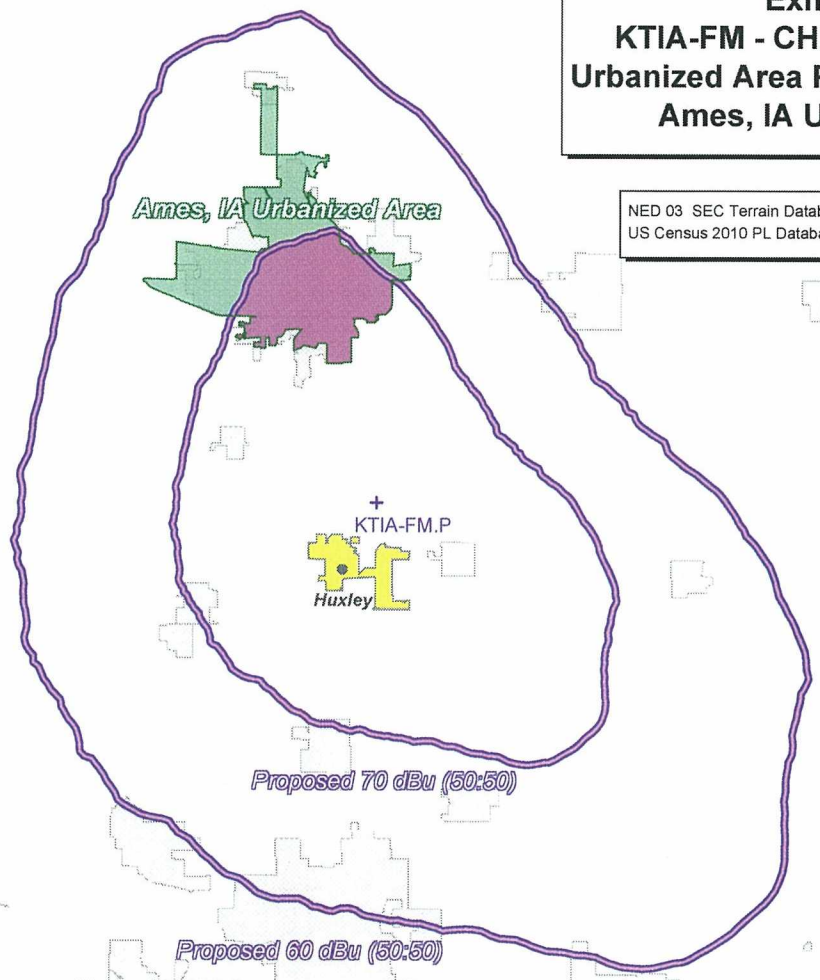
Conclusion. A Presumed Operation from ASR No. 1207229 which allows for more than 50% coverage of the Ames, IA Urbanized Area while maintaining 70 dBμ service to Huxley, IA has been demonstrated here-in. Therefore the KTIA-FM – Boone, IA to Huxley, IA (CH257A) pending application BPH-20121113AMW (as amended 01/17/2014) does not comply with the rebuttable presumption standards as set forth in *Rural Radio*[3]. Dismissal of BPH-20121113AMW as a non-preferential arrangement of allotments is therefore in order.

The Commission is also requested to review its most recent policy changes concerning the preparation of Presumptive Preclusion Showings and the aforementioned reasonable site assurance or "existing aperture policy" as recently implemented in this KTIA-FM Proceeding. Such a policy which allows the applicant to arbitrarily impose preferential study restrictions on itself (with regard to the number of antenna bays and/or studied antenna height), raises serious concerns about what is and isn't in the public interest. This is evident in Truth's pending application which reads, "*This would result in a hypothetical KTIA-FM antenna center of radiation height of 190 feet AGL. Accordingly, for a worst-case analysis (i.e. the best-case coverage toward Ames) this highest possible height for the applicant's antenna was considered for the supplemental analysis of ASR 1207229 submitted herein.*"[1] The truly "worst-case" hypothetical analysis for a 260 ft tower is not 190 ft. A more hypothetical approach remains simply running Presumptive Preclusion Studies from the top of each viable tower without regard to existing aperture space. This concretely removes the potential for abuse and is more easily replicable by all parties involved. Such a hypothetical study would not be exhaustive in nature, but the Commission openly acknowledged these studies were not conclusive tests[3] to begin with. However, regardless if the Commission reverses this precedent and adopts a "top-of-tower policy" (as originally submitted in the Saga Informal Objection) or retains the current "existing aperture policy", as included here-in; a presumed operation which allows for more than 50% coverage of the Ames, IA Urbanized Area while maintaining 70 dBμ service to Huxley, IA has been demonstrated from ASR No. 1207229.

[3] See *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order On Reconsideration, and Second Further Notice of Proposed Rule Making, 26 FCC Rcd 2556, 2567 (2011) (Footnote 97)

Exhibit 1.1
KTIA-FM - CH257A - Huxley, IA
Urbanized Area Presumptive Showing
Ames, IA Urbanized Area

Azi (Deg)	70 dBµ (km)	60 dBµ (km)
000°T	11.46	20.52
010°T	10.16	18.08
020°T	8.90	15.67
030°T	7.70	13.69
040°T	7.27	13.00
050°T	7.10	12.72
060°T	6.86	12.32
070°T	7.34	13.12
080°T	8.21	14.51
090°T	9.69	17.19
100°T	11.03	19.74
110°T	12.50	22.43
120°T	13.19	23.61
130°T	14.70	26.16
140°T	15.45	27.29
150°T	14.75	26.23
160°T	12.89	23.08
170°T	11.81	21.15
180°T	11.31	20.24
190°T	11.05	19.77
200°T	10.92	19.52
210°T	10.51	18.76
220°T	10.74	19.19
230°T	10.59	18.91
240°T	10.29	18.35
250°T	10.22	18.21
260°T	9.99	17.77
270°T	9.79	17.40
280°T	9.66	17.16
290°T	9.82	17.46
300°T	10.18	18.14
310°T	10.46	18.66
320°T	11.29	20.20
330°T	12.56	22.49
340°T	13.45	24.06
350°T	13.51	24.18



NED 03 SEC Terrain Database
US Census 2010 PL Database

KTIA-FM.P
Presumptive Preclusion
from ASR #1207229
Facility ID: 6417
Latitude: 41-55-29 N
Longitude: 093-34-49 W
ERP: 6.00 kW
Channel: 257A
Frequency: 99.3 MHz
AMSL Height: 352.0 m
HAAT: 58 m
Horiz. Pattern: Directional

70 dBu Coverage of UA
Area: 31.55 km² (52.3%)

Ames, IA - UA
Total Area: 60.33 km²
(U.S. Census 2010 Data)

Scale 1:275,000
0 4 8 12 km

MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036
1(517)278-7339

ASR Registration Search

Registration 1207229

Map Registration

Exhibit 1.2 - Copy of Existing Antenna Structure Registration

MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036
1(517)278-7339

Registration Detail

Reg Number	1207229	Status	Constructed
File Number	A0821793	Constructed	01/07/2008
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type: TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	41-55-28.5 N 093-34-49.6 W	Address	29640 560th Ave (Lewis IA6 #303458)
City, State	Cambridge , IA		
Zip	50046	County	STORY
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
292.3	79.2
Overall Height Above Mean Sea Level	**Overall Height Above Ground w/o Appurtenances**
371.5	77.1

Painting and Lighting Specifications

FAA Chapters 4, 8, 12
Paint and Light in Accordance with FAA Circular Number 70/7460-1K

FAA Notification

FAA Study	2007-ACE-4449-OE	FAA Issue Date	10/24/2007

Owner & Contact Information

FRN	0011498342	Owner Entity Type	Limited Liability Company
Assignor FRN	0014344485	Assignor ID	L00132178

Owner

SpectraSite Communications, LLC. through American Towers, LLC.
Attention To: Reguatory Compliance FAA FCC
10 Presidential Way
Woburn , MA 01801

P: (678)265-6770
F:
E: faa-fcc@americantower.com

Contact

Attention To: FAA FCC
10 Presidential Way
Woburn , MA 01801

P: (678)265-6770
F:
E: faa-fcc@americantower.com

Last Action Status

Status	Constructed	Received	01/16/2013
Purpose	Change Owner	Entered	01/16/2013
Mode	Interactive		

Related Applications

01/16/2013	A0821793 - Change Owner (OC)
11/10/2010	A0704340 - Notification (NT)
11/05/2007	A0568261 - Modification (MD)

Related applications (13)

Comments

Comments

None

History

Date	Event
01/17/2013	Registration Printed
01/17/2013	Change of Ownership Letter Sent
01/16/2013	Change of Ownership Received

All History (28)

Automated Letters

01/17/2013	Authorization, Reference
01/17/2013	Ownership Change, Reference 746781
11/11/2008	Construction Reminder, Reference 610152

All letters (12)

Exhibit 3.1
Section 307(b) Presumptive Preclusion Study
Tabulation of Commercial Allocation Spacings

REFERENCE
41 55 29.0 N.
93 34 49.0 W.

CLASS = A
Current Spacings to 3rd Adj.

DISPLAY DATES
DATA 01-17-14
SEARCH 01-17-14

Channel 257 - 99.3 MHz

Call	Channel	Location		Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	Power		HAAT		
KTIA-FM	APP-N 257A	Huxley		IA 235.8	14.49	114.5	-100.0
41 51 05.0	93 43 29.0	NCX	5.300 kW		95 M		
Truth Broadcasting Corpora			BPH20121113AMW				
One Step Application							
KTIA-FM	RSV-A 257A	Huxley		IA 230.2	16.31	114.5	-98.2
41 49 51.0	93 43 53.0		0.000 kW		100 M		
Truth Broadcasting Corpora							
One Step Application							
KTIA-FM	LIC 257A	Boone		IA 297.8	29.73	114.5	-84.8
42 02 55.0	93 53 54.0	CX	5.200 kW		107 M		
Truth Broadcasting Corpora			BMLH20060823AAD				
KDAO-FM	LIC 258A	Eldora		IA 48.2	56.81	71.5	-14.7
42 15 49.0	93 03 57.0	CN	3.000 kW		100 M		
Eldora Broadcasting Compan			BLH19920622KB				
R13803	DEL 258A	Winterset		IA 205.7	64.58	71.5	-6.9
41 24 02.0	93 54 58.0		0.000 kW		100 M		
Truth Broadcasting Corpora							
Involuntary channel substitution per BPH-20100126AGR - to Channel 269A							
KPUL	LIC 258A	Winterset		IA 205.7	64.58	71.5	-6.9
41 24 02.0	93 54 58.0	CN	6.000 kW		100 M		
Positive Impact Media, Inc			BLH19920602KA				
KSKB	LIC 256C2	Brooklyn		IA 104.1	104.82	105.5	-0.7
41 41 23.0	92 21 31.0	C	44.000 kW		160 M		
Florida Public Radio, Inc.			BLED20070328AAA				
KURE	LIC 203A	Ames		IA 334.6	12.92	9.5	3.4
42 01 47.0	93 38 51.0	CX	0.630 kW		22 M		
Residence Associations Bro			BLED20070430AAT				
KWAY-FM	LIC 257A	Waverly		IA 46.1	125.80	114.5	11.3
42 42 13.0	92 28 21.0	CX	4.600 kW		55 M		
Ael Suhr Enterprises, Inc.			BMLH20020114AAB				

RSV-R = reserved - needs protection, RSV-A = allocation
All separation margins include rounding

Green Text denotes the facility to be studied in in Presumptive Preclusion Showing Study. This facility need not be protected.

Blue Highlighted Text denotes allowable §73.215 short-spaced processing toward KDAO-FM - Eldora, IA and KSKB-FM - Brooklyn, IA. Full contour protection may be afforded KDAO-FM and KSKB(FM) as noted in ***Exhibit(s) 3.2*** and ***3.3***. The Rule Compliant directional antenna pattern employed by this Section 307(b) Presumptive Preclusion Study has been included in ***Exhibit 3.4.***

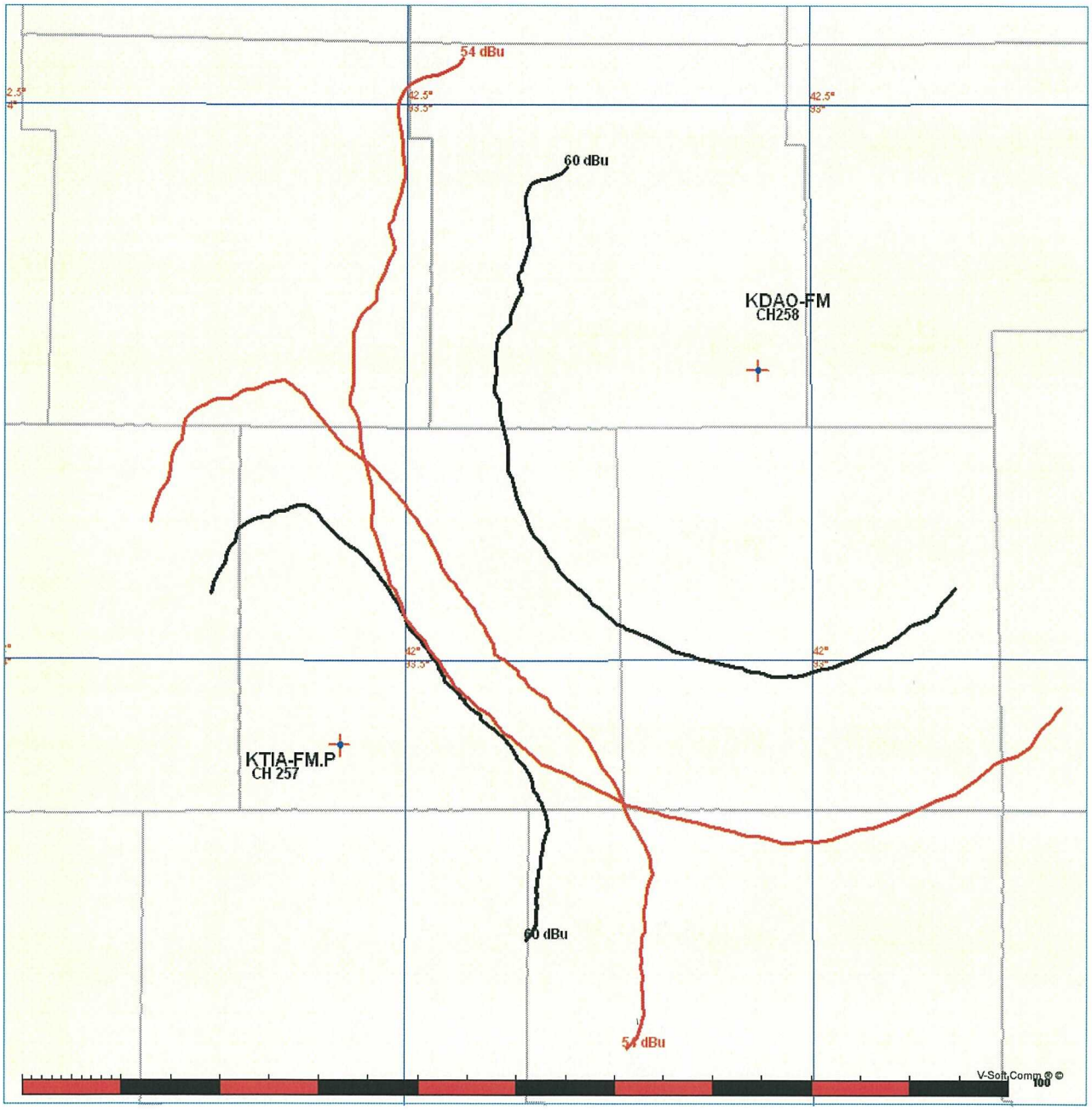
Yellow Highlighted Text denotes the involuntary channel substitution for KPUL(FM) - Winterset, IA (CH258A to CH269A) as proposed by KTIA-FM application BPH-20121113AMW. This facility need not be protected for purposes of this Section 307(b) Presumptive Preclusion Study.

Exhibit 3.2
§73.215 Contour Protection Studies
Toward KDAO-FM - Eldora, IA (Max Class Facilities)

FMCommander Single Allocation Study - 01-17-2014 - NED 03 SEC
KTIA-FM.P's Overlaps (In= 0.36 km, Out= 9.74 km)

KTIA-FM.P CH 257 A DA
Lat= 41 55 29.0, Lng= 93 34 49.0
6.0 kW 57.7 M HAAT, 352 M COR
Prot.= 60 dBu, Intef.= 54 dBu

KDAO-FM^ CH 258 A BLH19920622KB
Lat= 42 15 49.0, Lng= 93 03 57.0
Max Cls: 6.0 kW 100 M HAAT, 409 M COR
Prot.= 60 dBu, Intef.= 54 dBu



MUNN-REESE, INC.
Broadcast Engineering Consultants
COLDWATER, MI 49036

Exhibit 3.2
§73.215 Contour Protection Studies
Toward KDAO-FM - Eldora, IA (Max Class Facilities)

01-17-2014 Terrain Data: NED 03 SEC FMOver Analysis

KTIA-FM.P

Channel = 257A
Max ERP = 6 kW
RCAMSL = 352 M
N. Lat. 41 55 29.0
W. Lng. 93 34 49.0
Protected
60 dBu

KDAO-FM BLH19920622KB
(^ Max Class Parameters)
Channel = 258A
Max ERP = 6 kW
RCAMSL = 409 M
N. Lat. 42 15 49.0
W. Lng. 93 03 57.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
006.0	002.4961	0068.1	019.2	245.5	006.0000	0093.7	044.4	53.20	
007.0	002.3776	0067.7	018.9	244.9	006.0000	0093.8	044.3	53.26	
008.0	002.2620	0067.4	018.7	244.4	006.0000	0094.2	044.2	53.33	
009.0	002.1492	0067.1	018.4	243.8	006.0000	0094.6	044.1	53.40	
010.0	002.0393	0066.9	018.1	243.3	006.0000	0094.8	044.0	53.46	
011.0	001.9549	0066.6	017.8	242.8	006.0000	0095.0	043.9	53.52	
012.0	001.8722	0066.3	017.6	242.3	006.0000	0095.6	043.8	53.60	
013.0	001.7913	0066.0	017.3	241.8	006.0000	0095.9	043.7	53.66	
014.0	001.7122	0065.4	017.1	241.3	006.0000	0096.1	043.7	53.68	
015.0	001.6349	0065.6	016.9	240.8	006.0000	0096.4	043.6	53.74	
016.0	001.5594	0065.5	016.6	240.3	006.0000	0097.0	043.6	53.81	
017.0	001.4856	0065.2	016.4	239.8	006.0000	0097.4	043.6	53.84	
018.0	001.4137	0065.3	016.1	239.3	006.0000	0097.2	043.6	53.83	
019.0	001.3435	0065.3	015.9	238.9	006.0000	0096.8	043.6	53.81	
020.0	001.2751	0065.2	015.7	238.4	006.0000	0097.3	043.6	53.84	
021.0	001.2226	0065.0	015.5	237.9	006.0000	0097.7	043.6	53.87	
022.0	001.1711	0065.1	015.3	237.5	006.0000	0097.7	043.6	53.88	
023.0	001.1208	0065.2	015.1	237.1	006.0000	0097.9	043.5	53.91	
024.0	001.0715	0065.1	014.9	236.7	006.0000	0098.2	043.6	53.93	
025.0	001.0234	0064.8	014.7	236.2	006.0000	0098.6	043.6	53.94	
026.0	000.9764	0064.5	014.5	235.8	006.0000	0099.3	043.6	53.98	
027.0	000.9305	0064.1	014.3	235.4	006.0000	0099.8	043.7	54.00	
028.0	000.8857	0063.9	014.1	235.0	006.0000	0100.0	043.8	53.99	
029.0	000.8420	0063.3	013.9	234.6	006.0000	0099.9	043.9	53.94	
030.0	000.7994	0062.9	013.7	234.2	006.0000	0099.9	044.0	53.91	
031.0	000.7850	0062.6	013.6	233.8	006.0000	0099.9	043.9	53.91	
032.0	000.7707	0062.3	013.5	233.5	006.0000	0099.9	043.9	53.91	
033.0	000.7566	0061.9	013.4	233.2	006.0000	0099.9	043.9	53.91	
034.0	000.7426	0062.1	013.4	232.9	006.0000	0099.8	043.9	53.91	
035.0	000.7287	0062.2	013.3	232.6	006.0000	0099.6	043.9	53.91	
036.0	000.7150	0062.8	013.3	232.3	006.0000	0099.3	043.8	53.91	
037.0	000.7014	0062.1	013.2	231.9	006.0000	0099.0	043.9	53.87	
038.0	000.6879	0062.4	013.2	231.6	006.0000	0099.1	043.9	53.88	

Exhibit 3.2
§73.215 Contour Protection Studies
Toward KDAO-FM - Eldora, IA (Max Class Facilities)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
039.0	000.6746	0062.4	013.1	231.3	006.0000	0099.2	043.9	53.88
040.0	000.6613	0061.9	013.0	231.0	006.0000	0099.3	043.9	53.87
041.0	000.6582	0062.3	013.0	230.7	006.0000	0099.6	043.9	53.92
042.0	000.6550	0061.9	013.0	230.4	006.0000	0099.8	043.9	53.93
043.0	000.6518	0062.0	013.0	230.1	006.0000	0100.0	043.9	53.95
044.0	000.6487	0061.8	012.9	229.8	006.0000	0100.1	043.9	53.95
045.0	000.6455	0061.7	012.9	229.5	006.0000	0100.2	043.9	53.97
046.0	000.6424	0061.1	012.8	229.2	006.0000	0100.3	043.9	53.95
047.0	000.6392	0060.7	012.8	228.9	006.0000	0100.2	044.0	53.93
048.0	000.6361	0060.0	012.7	228.6	006.0000	0100.1	044.0	53.89
049.0	000.6330	0060.1	012.7	228.4	006.0000	0100.0	044.0	53.88
050.0	000.6299	0060.4	012.7	228.1	006.0000	0100.0	044.0	53.88
051.0	000.6299	0060.0	012.7	227.8	006.0000	0100.0	044.1	53.86
052.0	000.6299	0059.7	012.7	227.5	006.0000	0100.3	044.1	53.86
053.0	000.6299	0058.7	012.6	227.2	006.0000	0100.6	044.3	53.84
054.0	000.6299	0058.5	012.5	226.9	006.0000	0100.9	044.3	53.85
055.0	000.6299	0058.4	012.5	226.7	006.0000	0101.1	044.3	53.85
056.0	000.6299	0058.4	012.5	226.4	006.0000	0101.3	044.4	53.86
057.0	000.6299	0058.4	012.5	226.1	006.0000	0101.7	044.4	53.86
058.0	000.6299	0057.7	012.5	225.9	006.0000	0102.1	044.5	53.86
059.0	000.6299	0056.8	012.4	225.6	006.0000	0102.3	044.7	53.81
060.0	000.6299	0056.2	012.3	225.4	006.0000	0102.4	044.8	53.78
061.0	000.6455	0055.8	012.4	225.1	006.0000	0102.4	044.8	53.77
062.0	000.6613	0056.4	012.5	224.8	006.0000	0102.7	044.7	53.81
063.0	000.6774	0057.2	012.6	224.4	006.0000	0103.3	044.7	53.89
064.0	000.6936	0057.2	012.7	224.1	006.0000	0103.5	044.7	53.91
065.0	000.7100	0057.5	012.8	223.8	006.0000	0103.4	044.7	53.90
066.0	000.7266	0057.6	012.9	223.5	006.0000	0103.2	044.7	53.88
067.0	000.7434	0058.3	013.0	223.2	006.0000	0103.1	044.6	53.89
068.0	000.7604	0058.5	013.1	222.9	006.0000	0103.2	044.6	53.89
069.0	000.7776	0057.5	013.1	222.6	006.0000	0103.0	044.8	53.83
070.0	000.7950	0057.2	013.1	222.3	006.0000	0103.0	044.8	53.80
071.0	000.8143	0058.9	013.4	221.9	006.0000	0103.1	044.7	53.85
072.0	000.8339	0058.1	013.4	221.7	006.0000	0103.2	044.9	53.81
073.0	000.8537	0058.0	013.4	221.4	006.0000	0103.0	044.9	53.76
074.0	000.8737	0058.4	013.5	221.0	006.0000	0102.8	044.9	53.74
075.0	000.8940	0059.8	013.8	220.6	006.0000	0102.9	044.9	53.76
076.0	000.9145	0060.7	013.9	220.3	006.0000	0103.3	044.9	53.79
077.0	000.9352	0062.4	014.2	219.8	006.0000	0103.7	044.8	53.84
078.0	000.9562	0064.3	014.4	219.4	006.0000	0103.3	044.8	53.84
079.0	000.9774	0064.0	014.5	219.1	006.0000	0102.9	044.9	53.76
080.0	000.9988	0063.4	014.5	218.8	006.0000	0102.7	045.1	53.68
081.0	001.0514	0063.1	014.7	218.4	006.0000	0102.6	045.1	53.65
082.0	001.1053	0063.7	014.9	218.0	006.0000	0102.8	045.1	53.67
083.0	001.1605	0064.3	015.2	217.5	006.0000	0103.4	045.1	53.71
084.0	001.2172	0064.9	015.4	217.0	006.0000	0103.7	045.1	53.73

Exhibit 3.2
§73.215 Contour Protection Studies
Toward KDAO-FM - Eldora, IA (Max Class Facilities)

01-17-2014 Terrain Data: NED 03 SEC FMOver Analysis

KDAO-FM BLH19920622KB
(^ Max Class Parameters)
Channel = 258A
Max ERP = 6 kW
RCAMSL = 409 M
N. Lat. 42 15 49.0
W. Lng. 93 03 57.0
Protected
60 dBu

KTIA-FM.P
Channel = 257A
Max ERP = 6 kW
RCAMSL = 352 M
N. Lat. 41 55 29.0
W. Lng. 93 34 49.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
184.0	006.0000	0114.9	030.2	079.2	000.9816	0063.8	041.1	43.60	
185.0	006.0000	0114.0	030.1	078.9	000.9744	0064.1	040.7	43.79	
186.0	006.0000	0113.4	030.0	078.6	000.9679	0064.5	040.2	43.99	
187.0	006.0000	0112.8	029.9	078.2	000.9612	0064.5	039.7	44.14	
188.0	006.0000	0112.1	029.8	077.9	000.9535	0064.2	039.2	44.25	
189.0	006.0000	0111.9	029.8	077.6	000.9472	0063.4	038.8	44.32	
190.0	006.0000	0111.5	029.8	077.2	000.9397	0062.8	038.3	44.40	
191.0	006.0000	0111.3	029.7	076.9	000.9325	0062.1	037.8	44.47	
192.0	006.0000	0111.6	029.8	076.6	000.9269	0061.6	037.3	44.58	
193.0	006.0000	0110.7	029.7	076.1	000.9166	0060.8	036.9	44.61	
194.0	006.0000	0110.8	029.7	075.8	000.9093	0060.4	036.4	44.71	
195.0	006.0000	0110.5	029.6	075.3	000.9003	0060.0	036.0	44.80	
196.0	006.0000	0110.9	029.7	075.0	000.8930	0059.7	035.5	44.92	
197.0	006.0000	0111.0	029.7	074.5	000.8846	0059.1	035.1	44.98	
198.0	006.0000	0109.8	029.5	073.9	000.8712	0058.3	034.7	44.96	
199.0	006.0000	0109.4	029.5	073.3	000.8599	0057.8	034.3	45.01	
200.0	006.0000	0108.5	029.4	072.7	000.8470	0057.8	034.0	45.09	
201.0	006.0000	0108.3	029.4	072.1	000.8357	0058.0	033.6	45.22	
202.0	006.0000	0107.8	029.3	071.5	000.8231	0059.0	033.2	45.43	
203.0	006.0000	0107.5	029.3	070.8	000.8108	0058.8	032.9	45.51	
204.0	006.0000	0107.8	029.3	070.3	000.8002	0057.7	032.5	45.48	
205.0	006.0000	0107.5	029.3	069.6	000.7878	0057.0	032.1	45.45	
206.0	006.0000	0107.4	029.3	068.9	000.7762	0057.6	031.8	45.63	
207.0	006.0000	0108.2	029.4	068.4	000.7664	0058.1	031.4	45.83	
208.0	006.0000	0108.0	029.3	067.6	000.7539	0058.7	031.1	46.01	
209.0	006.0000	0108.7	029.4	067.0	000.7429	0058.2	030.7	46.06	
210.0	006.0000	0107.9	029.3	066.1	000.7283	0057.6	030.4	46.00	
211.0	006.0000	0107.1	029.2	065.2	000.7134	0057.5	030.2	46.01	
212.0	006.0000	0106.5	029.1	064.3	000.6989	0057.4	030.0	46.03	
213.0	006.0000	0105.8	029.0	063.4	000.6838	0057.3	029.8	46.02	
214.0	006.0000	0105.0	029.0	062.5	000.6687	0056.6	029.6	45.91	
215.0	006.0000	0105.6	029.0	061.7	000.6559	0056.2	029.3	45.92	
216.0	006.0000	0105.0	028.9	060.7	000.6408	0055.7	029.2	45.84	

Exhibit 3.2
§73.215 Contour Protection Studies
Toward KDAO-FM - Eldora, IA (Max Class Facilities)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
217.0	006.0000	0103.7	028.8	059.7	000.6299	0056.5	029.1	45.92
218.0	006.0000	0102.8	028.7	058.7	000.6299	0057.1	029.1	46.05
219.0	006.0000	0102.8	028.7	057.7	000.6299	0057.9	028.9	46.28
220.0	006.0000	0103.6	028.8	056.8	000.6299	0058.3	028.6	46.48
221.0	006.0000	0102.8	028.7	055.8	000.6299	0058.3	028.6	46.50
222.0	006.0000	0103.1	028.7	054.9	000.6299	0058.3	028.4	46.60
223.0	006.0000	0103.2	028.7	053.9	000.6299	0058.5	028.3	46.69
224.0	006.0000	0103.5	028.8	052.9	000.6299	0058.7	028.2	46.80
225.0	006.0000	0102.4	028.6	051.9	000.6299	0059.7	028.2	46.90
226.0	006.0000	0101.9	028.5	050.8	000.6299	0060.0	028.3	46.92
227.0	006.0000	0100.8	028.4	049.8	000.6305	0060.4	028.4	46.92
228.0	006.0000	0100.0	028.3	048.8	000.6336	0060.1	028.5	46.84
229.0	006.0000	0100.3	028.3	047.8	000.6367	0060.1	028.4	46.89
230.0	006.0000	0100.0	028.3	046.8	000.6398	0060.8	028.5	46.97
231.0	006.0000	0099.3	028.2	045.8	000.6429	0061.1	028.6	46.96
232.0	006.0000	0099.1	028.2	044.9	000.6459	0061.8	028.7	47.02
233.0	006.0000	0099.8	028.3	043.9	000.6491	0061.9	028.6	47.07
234.0	006.0000	0099.9	028.3	042.9	000.6522	0062.0	028.7	47.07
235.0	006.0000	0100.0	028.3	041.9	000.6552	0061.9	028.8	47.02
236.0	006.0000	0098.9	028.1	041.0	000.6580	0062.3	029.1	46.93
237.0	006.0000	0098.0	028.0	040.2	000.6608	0061.9	029.3	46.77
238.0	006.0000	0097.7	028.0	039.3	000.6707	0062.2	029.5	46.76
239.0	006.0000	0096.8	027.9	038.5	000.6814	0062.4	029.8	46.70
240.0	006.0000	0097.3	027.9	037.6	000.6938	0062.2	029.9	46.70
241.0	006.0000	0096.2	027.8	036.8	000.7038	0062.2	030.2	46.59
242.0	006.0000	0095.8	027.7	036.0	000.7146	0062.8	030.5	46.60
243.0	006.0000	0094.9	027.6	035.3	000.7241	0062.2	030.8	46.41
244.0	006.0000	0094.5	027.5	034.6	000.7343	0062.1	031.1	46.32
245.0	006.0000	0093.8	027.5	033.9	000.7438	0062.1	031.4	46.23
246.0	006.0000	0093.3	027.4	033.2	000.7532	0061.9	031.7	46.11
247.0	006.0000	0093.3	027.4	032.5	000.7634	0061.9	032.0	46.05
248.0	006.0000	0093.4	027.4	031.8	000.7733	0062.3	032.2	46.03
249.0	006.0000	0092.0	027.2	031.3	000.7801	0062.5	032.7	45.90
250.0	006.0000	0090.5	027.0	030.9	000.7861	0062.6	033.1	45.75
251.0	006.0000	0089.5	026.9	030.4	000.7929	0062.8	033.5	45.63
252.0	006.0000	0088.9	026.8	029.9	000.8017	0062.9	033.9	45.53
253.0	006.0000	0087.9	026.6	029.5	000.8192	0063.1	034.3	45.47
254.0	006.0000	0087.6	026.6	029.0	000.8408	0063.3	034.7	45.46
255.0	006.0000	0087.5	026.6	028.5	000.8634	0063.7	035.0	45.48
256.0	006.0000	0087.2	026.5	028.0	000.8837	0063.9	035.4	45.44
257.0	006.0000	0087.2	026.5	027.5	000.9064	0064.1	035.7	45.44
258.0	006.0000	0087.6	026.6	027.0	000.9306	0064.1	036.1	45.42
259.0	006.0000	0087.6	026.6	026.5	000.9515	0064.3	036.4	45.40
260.0	006.0000	0087.8	026.6	026.1	000.9734	0064.5	036.8	45.36
261.0	006.0000	0087.2	026.5	025.8	000.9877	0064.5	037.2	45.26

Exhibit 3.3
§73.215 Contour Protection Studies
Toward KSKB(FM) - Brooklyn, IA (Max Class Facilities)

FMCommander Single Allocation Study - 01-17-2014 - NED 03 SEC
KTIA-FM.P's Overlaps (In= 7.96 km, Out= 23.95 km)

KTIA-FM.P CH 257 A DA
Lat= 41 55 29.0, Lng= 93 34 49.0
6.0 kW 57.7 M HAAT, 352 M COR
Prot.= 60 dBu, Intef.= 54 dBu

KSKB^ CH 256 C2 BLED20070328AAA
Lat= 41 41 23.0, Lng= 92 21 31.0
Max Cls: 50.0 kW 150 M HAAT, 416.5 M COR
Prot.= 60 dBu, Intef.= 54 dBu

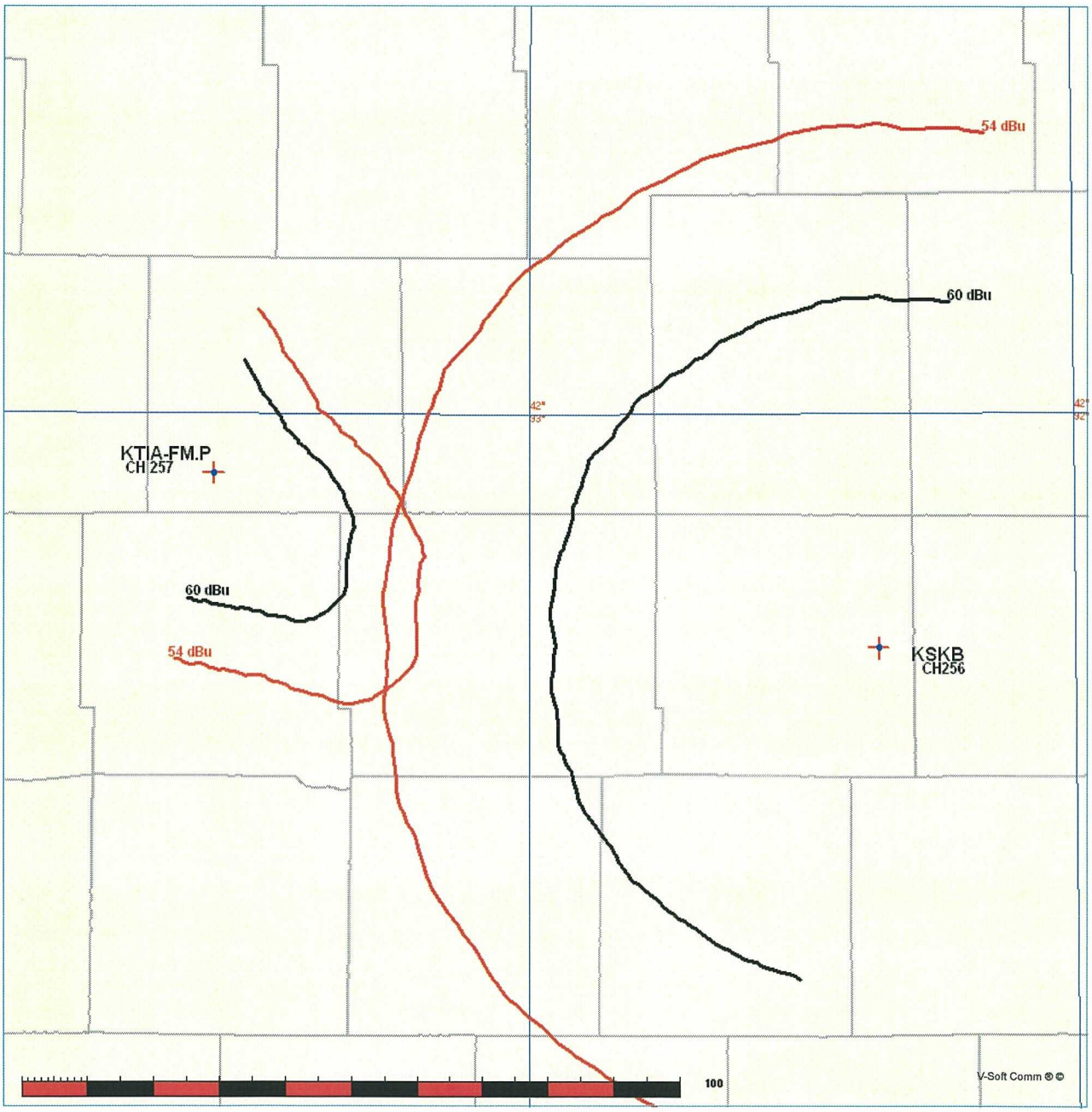


Exhibit 3.3
§73.215 Contour Protection Studies
Toward KSKB(FM) - Brooklyn, IA (Max Class Facilities)

01-17-2014 Terrain Data: NED 03 SEC FMOver Analysis

KTIA-FM.P

Channel = 257A
Max ERP = 6 kW
RCAMSL = 352 M
N. Lat. 41 55 29.0
W. Lng. 93 34 49.0
Protected
60 dBu

KSKB BLED20070328AAA
(^ Max Class Parameters)
Channel = 256C2
Max ERP = 50 kW
RCAMSL = 416.5 M
N. Lat. 41 41 23.0
W. Lng. 92 21 31.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
062.0	000.6613	0056.4	012.5	289.9	050.0000	0135.4	095.7	48.26	
063.0	000.6774	0057.2	012.6	289.9	050.0000	0135.4	095.4	48.33	
064.0	000.6936	0057.2	012.7	289.8	050.0000	0135.4	095.2	48.39	
065.0	000.7100	0057.5	012.8	289.7	050.0000	0135.4	095.0	48.45	
066.0	000.7266	0057.6	012.9	289.7	050.0000	0135.4	094.8	48.50	
067.0	000.7434	0058.3	013.0	289.6	050.0000	0135.3	094.5	48.57	
068.0	000.7604	0058.5	013.1	289.6	050.0000	0135.3	094.3	48.63	
069.0	000.7776	0057.5	013.1	289.5	050.0000	0135.2	094.2	48.66	
070.0	000.7950	0057.2	013.1	289.4	050.0000	0135.2	094.0	48.71	
071.0	000.8143	0058.9	013.4	289.3	050.0000	0135.2	093.6	48.80	
072.0	000.8339	0058.1	013.4	289.2	050.0000	0135.3	093.5	48.84	
073.0	000.8537	0058.0	013.4	289.1	050.0000	0135.5	093.3	48.90	
074.0	000.8737	0058.4	013.5	289.1	050.0000	0135.6	093.1	48.97	
075.0	000.8940	0059.8	013.8	289.0	050.0000	0135.7	092.8	49.06	
076.0	000.9145	0060.7	013.9	288.9	050.0000	0135.9	092.5	49.14	
077.0	000.9352	0062.4	014.2	288.9	050.0000	0136.0	092.2	49.24	
078.0	000.9562	0064.3	014.4	288.8	050.0000	0136.1	091.8	49.35	
079.0	000.9774	0064.0	014.5	288.7	050.0000	0136.2	091.6	49.40	
080.0	000.9988	0063.4	014.5	288.6	050.0000	0136.4	091.5	49.44	
081.0	001.0514	0063.1	014.7	288.5	050.0000	0136.3	091.2	49.51	
082.0	001.1053	0063.7	014.9	288.4	050.0000	0136.3	090.9	49.61	
083.0	001.1605	0064.3	015.2	288.3	050.0000	0136.3	090.6	49.70	
084.0	001.2172	0064.9	015.4	288.2	050.0000	0136.2	090.2	49.80	
085.0	001.2751	0066.5	015.8	288.2	050.0000	0136.2	089.7	49.93	
086.0	001.3344	0066.9	016.1	288.1	050.0000	0136.1	089.4	50.02	
087.0	001.3951	0067.6	016.4	288.0	050.0000	0136.0	089.0	50.13	
088.0	001.4571	0068.8	016.7	287.9	050.0000	0136.0	088.6	50.25	
089.0	001.5205	0069.2	017.0	287.7	050.0000	0135.9	088.3	50.35	
090.0	001.5852	0069.2	017.2	287.6	050.0000	0135.7	088.0	50.42	
091.0	001.6683	0068.9	017.4	287.4	050.0000	0135.6	087.7	50.50	
092.0	001.7535	0068.9	017.6	287.3	050.0000	0135.5	087.4	50.58	
093.0	001.8408	0068.4	017.8	287.1	050.0000	0135.3	087.2	50.64	
094.0	001.9303	0068.6	018.0	287.0	050.0000	0135.3	086.8	50.73	

Exhibit 3.3
§73.215 Contour Protection Studies
Toward KSKB(FM) - Brooklyn, IA (Max Class Facilities)

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
095.0	002.0219	0068.1	018.2	286.8	050.0000	0135.3	086.6	50.79
096.0	002.1156	0069.6	018.6	286.6	050.0000	0135.5	086.2	50.93
097.0	002.2114	0070.2	018.9	286.4	050.0000	0135.8	085.8	51.05
098.0	002.3094	0070.7	019.2	286.2	050.0000	0136.4	085.5	51.17
099.0	002.4095	0071.6	019.5	286.0	050.0000	0136.8	085.1	51.29
100.0	002.5117	0071.7	019.7	285.8	050.0000	0137.1	084.9	51.38
101.0	002.6438	0071.3	019.9	285.6	050.0000	0137.2	084.7	51.45
102.0	002.7793	0070.6	020.1	285.4	050.0000	0137.5	084.5	51.52
103.0	002.9182	0070.3	020.3	285.1	050.0000	0137.6	084.3	51.58
104.0	003.0605	0071.1	020.6	284.9	050.0000	0137.6	083.9	51.69
105.0	003.2062	0071.5	020.9	284.6	050.0000	0137.9	083.6	51.78
106.0	003.3552	0072.6	021.3	284.4	050.0000	0138.0	083.3	51.90
107.0	003.5077	0073.1	021.6	284.1	050.0000	0138.1	083.0	51.98
108.0	003.6635	0073.7	021.9	283.8	050.0000	0138.3	082.7	52.08
109.0	003.8227	0074.4	022.2	283.5	050.0000	0138.2	082.4	52.16
110.0	003.9853	0074.3	022.4	283.3	050.0000	0137.8	082.3	52.18
111.0	004.1683	0073.9	022.6	283.0	050.0000	0137.6	082.2	52.21
112.0	004.3554	0074.1	022.9	282.7	050.0000	0137.6	082.0	52.27
113.0	004.5466	0072.5	022.9	282.4	050.0000	0137.6	082.0	52.24
114.0	004.7419	0070.6	022.8	282.1	050.0000	0137.3	082.2	52.19
115.0	004.9413	0069.9	022.9	281.8	050.0000	0136.7	082.2	52.17
116.0	005.1449	0069.0	023.0	281.6	050.0000	0136.4	082.2	52.15
117.0	005.3525	0068.5	023.1	281.3	050.0000	0136.1	082.2	52.14
118.0	005.5642	0067.5	023.2	281.0	050.0000	0136.0	082.2	52.12
119.0	005.7801	0066.9	023.3	280.7	050.0000	0135.8	082.2	52.10
120.0	006.0000	0067.6	023.6	280.3	050.0000	0135.5	082.1	52.13
121.0	006.0000	0068.8	023.8	280.0	050.0000	0135.1	082.1	52.12
122.0	006.0000	0069.0	023.8	279.8	050.0000	0134.9	082.2	52.07
123.0	006.0000	0070.3	024.0	279.4	050.0000	0135.2	082.2	52.09
124.0	006.0000	0071.6	024.2	279.1	050.0000	0135.6	082.2	52.11
125.0	006.0000	0073.6	024.5	278.8	050.0000	0135.7	082.1	52.13
126.0	006.0000	0075.0	024.7	278.4	050.0000	0136.0	082.1	52.15
127.0	006.0000	0077.6	025.1	278.0	050.0000	0135.8	082.0	52.17
128.0	006.0000	0079.5	025.4	277.7	050.0000	0135.8	082.0	52.18
129.0	006.0000	0082.2	025.8	277.2	050.0000	0136.1	081.9	52.22
130.0	006.0000	0084.7	026.2	276.8	050.0000	0136.4	081.8	52.25
131.0	006.0000	0087.4	026.5	276.4	050.0000	0136.7	081.8	52.28
132.0	006.0000	0089.4	026.8	276.0	050.0000	0136.7	081.8	52.27
133.0	006.0000	0090.8	027.0	275.7	050.0000	0136.8	081.9	52.24
134.0	006.0000	0092.0	027.2	275.4	050.0000	0136.9	082.1	52.19
135.0	006.0000	0092.5	027.3	275.1	050.0000	0136.5	082.4	52.10
136.0	006.0000	0092.6	027.3	274.8	050.0000	0136.0	082.7	51.98
137.0	006.0000	0092.5	027.3	274.6	050.0000	0135.5	083.0	51.86
138.0	006.0000	0092.2	027.2	274.4	050.0000	0135.1	083.4	51.74
139.0	006.0000	0092.4	027.3	274.1	050.0000	0134.7	083.7	51.63
140.0	006.0000	0092.6	027.3	273.9	050.0000	0134.1	084.0	51.51

Exhibit 3.3
§73.215 Contour Protection Studies
Toward KSKB(FM) - Brooklyn, IA (Max Class Facilities)

01-17-2014 Terrain Data: NED 03 SEC FMOver Analysis

KSKB BLED20070328AAA
(^ Max Class Parameters)
Channel = 256C2
Max ERP = 50 kW
RCAMSL = 416.5 M
N. Lat. 41 41 23.0
W. Lng. 92 21 31.0
Protected
60 dBu

KTIA-FM.P
Channel = 257A
Max ERP = 6 kW
RCAMSL = 352 M
N. Lat. 41 55 29.0
W. Lng. 93 34 49.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
240.0	050.0000	0144.5	051.5	132.1	006.0000	0089.6	077.2	42.11	
241.0	050.0000	0145.3	051.6	132.0	006.0000	0089.4	076.3	42.34	
242.0	050.0000	0145.4	051.6	131.8	006.0000	0089.1	075.4	42.56	
243.0	050.0000	0145.5	051.6	131.6	006.0000	0088.7	074.6	42.78	
244.0	050.0000	0144.7	051.5	131.2	006.0000	0087.9	073.8	42.96	
245.0	050.0000	0142.8	051.2	130.8	006.0000	0086.9	073.0	43.10	
246.0	050.0000	0141.7	051.1	130.4	006.0000	0085.8	072.3	43.25	
247.0	050.0000	0140.3	050.9	129.9	006.0000	0084.5	071.6	43.37	
248.0	050.0000	0139.1	050.7	129.5	006.0000	0083.4	070.9	43.51	
249.0	050.0000	0140.3	050.9	129.3	006.0000	0082.9	070.0	43.72	
250.0	050.0000	0141.8	051.1	129.1	006.0000	0082.4	069.1	43.94	
251.0	050.0000	0141.8	051.1	128.7	006.0000	0081.5	068.4	44.09	
252.0	050.0000	0143.0	051.3	128.4	006.0000	0080.7	067.5	44.28	
253.0	050.0000	0143.4	051.3	128.0	006.0000	0079.6	066.7	44.43	
254.0	050.0000	0141.7	051.1	127.4	006.0000	0078.4	066.1	44.52	
255.0	050.0000	0139.2	050.7	126.7	006.0000	0076.5	065.6	44.53	
256.0	050.0000	0137.9	050.5	126.1	006.0000	0075.1	065.1	44.60	
257.0	050.0000	0137.0	050.4	125.5	006.0000	0074.3	064.5	44.71	
258.0	050.0000	0136.4	050.3	124.9	006.0000	0073.5	063.9	44.82	
259.0	050.0000	0134.8	050.1	124.2	006.0000	0072.1	063.4	44.86	
260.0	050.0000	0136.0	050.3	123.8	006.0000	0071.2	062.6	45.02	
261.0	050.0000	0136.6	050.4	123.3	006.0000	0070.5	062.0	45.16	
262.0	050.0000	0137.9	050.5	122.8	006.0000	0070.1	061.2	45.35	
263.0	050.0000	0137.5	050.5	122.1	006.0000	0069.2	060.7	45.44	
264.0	050.0000	0136.3	050.3	121.4	006.0000	0068.9	060.3	45.55	
265.0	050.0000	0134.6	050.1	120.6	006.0000	0068.0	059.9	45.58	
266.0	050.0000	0132.7	049.8	119.7	005.9409	0067.4	059.7	45.58	
267.0	050.0000	0131.8	049.7	119.0	005.7732	0066.9	059.3	45.53	
268.0	050.0000	0131.5	049.6	118.2	005.6146	0067.4	058.9	45.58	
269.0	050.0000	0130.4	049.5	117.4	005.4426	0068.3	058.6	45.61	
270.0	050.0000	0129.7	049.4	116.6	005.2762	0068.8	058.2	45.62	
271.0	050.0000	0130.6	049.5	115.9	005.1295	0069.0	057.7	45.68	
272.0	050.0000	0131.6	049.6	115.2	004.9826	0069.8	057.2	45.77	

Exhibit 3.3
§73.215 Contour Protection Studies
Toward KSKB(FM) - Brooklyn, IA (Max Class Facilities)

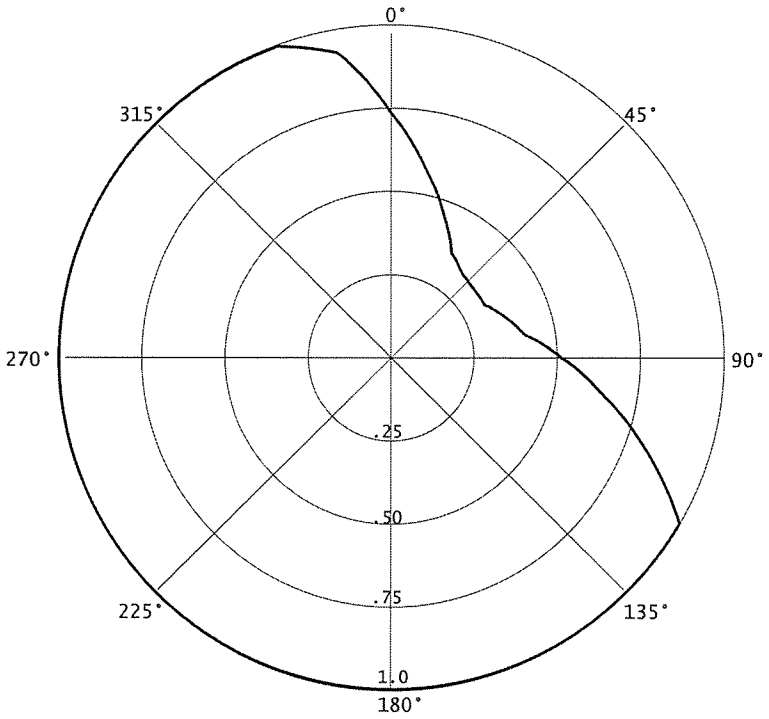
Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
273.0	050.0000	0132.8	049.8	114.5	004.8352	0070.2	056.7	45.84
274.0	050.0000	0134.4	050.0	113.7	004.6889	0071.3	056.2	45.97
275.0	050.0000	0136.3	050.3	113.0	004.5432	0072.6	055.7	46.13
276.0	050.0000	0136.7	050.4	112.1	004.3813	0074.0	055.3	46.20
277.0	050.0000	0136.2	050.3	111.2	004.2127	0073.9	055.2	46.08
278.0	050.0000	0135.8	050.2	110.3	004.0474	0074.2	055.0	45.99
279.0	050.0000	0135.6	050.2	109.4	003.8938	0074.3	054.9	45.88
280.0	050.0000	0135.1	050.1	108.5	003.7469	0074.4	054.8	45.75
281.0	050.0000	0136.0	050.3	107.6	003.6067	0073.2	054.5	45.57
282.0	050.0000	0137.0	050.4	106.7	003.4669	0073.2	054.3	45.48
283.0	050.0000	0137.6	050.5	105.8	003.3272	0072.3	054.1	45.27
284.0	050.0000	0138.1	050.6	104.9	003.1890	0071.4	054.0	45.06
285.0	050.0000	0137.6	050.5	103.9	003.0529	0071.0	054.1	44.81
286.0	050.0000	0136.8	050.4	103.0	002.9208	0070.3	054.2	44.51
287.0	050.0000	0135.3	050.2	102.1	002.7940	0070.6	054.5	44.25
288.0	050.0000	0136.0	050.3	101.2	002.6677	0071.2	054.4	44.12
289.0	050.0000	0135.8	050.2	100.3	002.5467	0071.6	054.6	43.90
290.0	050.0000	0135.5	050.2	099.4	002.4467	0071.8	054.7	43.69
291.0	050.0000	0135.6	050.2	098.5	002.3555	0071.0	054.9	43.40
292.0	050.0000	0136.4	050.3	097.5	002.2645	0070.5	055.0	43.16
293.0	050.0000	0138.4	050.6	096.6	002.1710	0070.1	054.9	42.96
294.0	050.0000	0140.5	050.9	095.6	002.0789	0068.9	054.9	42.68
295.0	050.0000	0140.1	050.8	094.7	001.9987	0068.4	055.2	42.35
296.0	050.0000	0141.4	051.0	093.8	001.9143	0068.6	055.4	42.13
297.0	050.0000	0142.0	051.1	092.9	001.8354	0068.4	055.6	41.85
298.0	050.0000	0142.6	051.2	092.1	001.7594	0068.8	055.9	41.61
299.0	050.0000	0144.7	051.5	091.1	001.6781	0068.9	056.1	41.36
300.0	050.0000	0144.4	051.4	090.3	001.6120	0069.1	056.5	41.06
301.0	050.0000	0146.4	051.7	089.4	001.5461	0069.4	056.7	40.83
302.0	050.0000	0149.0	052.1	088.4	001.4845	0068.9	056.9	40.56
303.0	050.0000	0148.6	052.0	087.7	001.4389	0068.3	057.5	40.19
304.0	050.0000	0146.5	051.7	087.1	001.4034	0067.7	058.2	39.79
305.0	050.0000	0144.7	051.5	086.6	001.3694	0067.1	058.9	39.40
306.0	050.0000	0142.5	051.2	086.1	001.3389	0066.9	059.7	39.05
307.0	050.0000	0142.4	051.2	085.4	001.3007	0066.7	060.3	38.73
308.0	050.0000	0142.2	051.1	084.8	001.2647	0066.3	060.9	38.38
309.0	050.0000	0144.6	051.5	084.0	001.2169	0064.9	061.3	38.00
310.0	050.0000	0144.3	051.4	083.4	001.1849	0064.5	062.0	37.66
311.0	050.0000	0143.7	051.3	082.9	001.1560	0064.2	062.7	37.33
312.0	050.0000	0144.1	051.4	082.3	001.1237	0063.9	063.3	37.01
313.0	050.0000	0144.9	051.5	081.7	001.0912	0063.6	063.9	36.69
314.0	050.0000	0146.6	051.7	081.1	001.0553	0063.1	064.5	36.37
315.0	050.0000	0146.7	051.8	080.6	001.0291	0062.9	065.2	36.05
316.0	050.0000	0146.7	051.8	080.1	001.0051	0063.3	065.9	35.78
317.0	050.0000	0145.5	051.6	079.8	000.9946	0063.6	066.8	35.54

Exhibit 3.4
Copy of Presumptive Preclusion Site Directional Antenna Pattern

KTIA-FM.P 01-17-2014 RMS(V)= .867

Graph is Relative Field

Azi	Field	dBk	kW
000	0.738	05.143	3.268
010	0.583	03.095	2.039
020	0.461	01.056	1.275
030	0.365	-00.973	0.799
040	0.332	-01.796	0.661
050	0.324	-02.008	0.630
060	0.324	-02.008	0.630
070	0.364	-00.996	0.795
080	0.408	-00.005	0.999
090	0.514	02.001	1.585
100	0.647	04.000	2.512
110	0.815	06.005	3.985
120	1.000	07.782	6.000
130	1.000	07.782	6.000
140	1.000	07.782	6.000
150	1.000	07.782	6.000
160	1.000	07.782	6.000
170	1.000	07.782	6.000
180	1.000	07.782	6.000
190	1.000	07.782	6.000
200	1.000	07.782	6.000
210	1.000	07.782	6.000
220	1.000	07.782	6.000
230	1.000	07.782	6.000
240	1.000	07.782	6.000
250	1.000	07.782	6.000
260	1.000	07.782	6.000
270	1.000	07.782	6.000
280	1.000	07.782	6.000
290	1.000	07.782	6.000
300	1.000	07.782	6.000
310	1.000	07.782	6.000
320	1.000	07.782	6.000
330	1.000	07.782	6.000
340	1.000	07.782	6.000
350	0.934	07.188	5.234



Compliance with §73.316(b) has been maintained concerning the 15 dB front to back ratio and 2 dB per 10 degree ratio(s) under the rounding provisions as allowed by the Commission. Inspection of each 10 degree increment will yield nominal values of 2 dB per 10 degrees. Values in excess of 2 dB per 10 degrees are *de minimis* in nature and therefore allowable under §73.316(b).

PROPOSED PRECLUSION PATTERN (additional 10 degree calculations)

° True	Relative Field	dB/10°	dBk	Equivalent Power (kW)	° True	Relative Field	dB/10°	dBk	Equivalent Power (kW)
0°	0.738	-2.046	5.143	3.268	180°	1.000	0.000	7.782	6.000
10°	0.583	-2.048	3.095	2.039	190°	1.000	0.000	7.782	6.000
20°	0.461	-2.039	1.056	1.275	200°	1.000	0.000	7.782	6.000
30°	0.365	-2.028	-0.973	0.799	210°	1.000	0.000	7.782	6.000
40°	0.332	-0.823	-1.796	0.661	220°	1.000	0.000	7.782	6.000
50°	0.324	-0.212	-2.008	0.630	230°	1.000	0.000	7.782	6.000
60°	0.324	0.000	-2.008	0.630	240°	1.000	0.000	7.782	6.000
70°	0.364	1.011	-0.996	0.795	250°	1.000	0.000	7.782	6.000
80°	0.408	0.991	-0.005	0.999	260°	1.000	0.000	7.782	6.000
90°	0.514	2.006	2.001	1.585	270°	1.000	0.000	7.782	6.000
100°	0.647	1.999	4.000	2.512	280°	1.000	0.000	7.782	6.000
110°	0.815	2.005	6.005	3.985	290°	1.000	0.000	7.782	6.000
120°	1.000	1.777	7.782	6.000	300°	1.000	0.000	7.782	6.000
130°	1.000	0.000	7.782	6.000	310°	1.000	0.000	7.782	6.000
140°	1.000	0.000	7.782	6.000	320°	1.000	0.000	7.782	6.000
150°	1.000	0.000	7.782	6.000	330°	1.000	0.000	7.782	6.000
160°	1.000	0.000	7.782	6.000	340°	1.000	0.000	7.782	6.000
170°	1.000	0.000	7.782	6.000	350°	0.934	-0.593	7.188	5.234

CERTIFICATE OF SERVICE

I, Sherry L. Schunemann, a secretary in the law office of Smithwick & Belendiuk, P.C., do hereby certify that a copy of the foregoing "Supplement to Informal Objection" was mailed by First Class U.S. Mail, postage prepaid (or via hand delivery if marked with an asterisk), this 23rd day of January, 2014, to the following:

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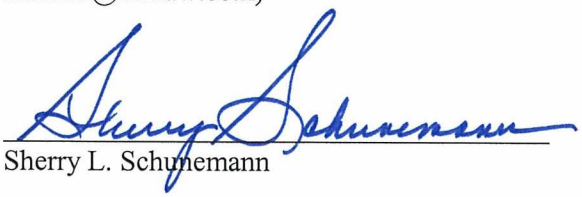

Sherry L. Schunemann