

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

JUL 25 1995

IN REPLY REFER TO:
1800B3-RPC

Circle S Broadcasting Company, Inc.
Radio Station KBSZ(FM)
801 W. Wickenburg Way
Wickenburg, AZ 85390

Re: KBSZ(FM), Wickenburg, AZ
Circle S Broadcasting Company, Inc.
BPH-950217IH

Dear Licensee:

The staff has under consideration: (1) the above-captioned minor change application filed by Circle S Broadcasting Company, Inc., ("Circle") seeking to upgrade from Channel 229A to Channel 231C3 pursuant to MM Docket 93-71;¹ (2) Circle's May 3, 1995 amendment modifying its technical proposal and requesting waiver of the Commission's rules; and (3) an Informal Objection dated July 17, 1995 filed by Compass Radio of Phoenix, Inc., ("Compass") licensee of KOOL(FM), Phoenix, Arizona. By this letter we will deny Circle's waiver request, dismiss the application and dismiss the Informal Objection.

Proposal. Our study of Circle's amended proposal reveals that it is short-spaced by 10.6 kilometers to licensed first-adjacent Class C station KMGN(FM), Flagstaff, Arizona and short-spaced by 1.54 kilometers to licensed second-adjacent Class C Station KOOL(FM), Phoenix, Arizona. Circle recognizes these short-spacings, requests processing pursuant to § 73.215 and seeks waiver of the Commissions rules.²

The enclosed exhibits reveal that prohibited contour overlap will occur. Exhibit #1 shows Circle's proposed 60 dBu protected contour will be overlapped by KMGN(FM)'s 54 dBu interfering contour by as much as 14.6 kilometers between the azimuths of 2°T to 89°T as referenced from Circle's proposed transmitter site. Exhibit #2 shows Circle's proposed 100 dBu interfering contour will overlap KOOL(FM)'s 60 dBu protected contour by as much as 2.7 kilometers between the azimuths of 313°T to 316°T as referenced from KOOL(FM). This is in contravention with § 73.215(a).³ In addition, Circle's amended proposal violates the minimum

¹ See Report and Order in MM Docket 93-71 9 FCC Rcd 2308 and Memorandum Opinion and Order in MM Docket 93-71, 10 FCC Rcd 1576. The proceeding in MM Docket 93-71 established reference coordinates for the Channel 231C3 Wickenburg, Arizona allotment at 33° 51' 31" NL and 112° 53' 04" WL. Circle's instant application proposes a transmitter site that is 11.2 kilometers from the Channel 231C3 allotment reference coordinates.

² Circle's amendment seeks waiver of the Commission's rules. However, Circle does not cite any specific Commission rule section for which waiver is sought. Upon reviewing Circle's amended proposal, we will take this statement to be a request for waiver of § 73.215.

³ The application, as originally filed, also violates § 73.215(a) with respect to KMGN(FM) and KOOL(FM).

separation requirements of § 73.215(e) with respect to KOOL(FM).⁴ The required spacing pursuant to § 73.215(e) is 95 kilometers, while the proposed spacing is 94.46 kilometers.

In support of its waiver request, Circle: (1) submits supplemental terrain studies pursuant to § 73.313(e) to demonstrate that intervening terrain greatly reduces or eliminates the predicted areas of overlap between its proposal and stations KMGN(FM) and KOOL(FM); (2) cites *New Life Enterprises, Inc.*, 7 FCC Rcd 843, 844 (1992), indicating that the overlap area between its proposal and KOOL(FM) is *de minimis* because the overlap area does not encompass any population and the land area is owned by state and federal governments, which prohibit any construction; and (3) argues that KOOL(FM) and KMGN(FM) have not built full Class C facilities and they are not able to construct full Class C facilities because of local zoning restrictions and Federal Aviation Administration (FAA) considerations.

Discussion. Section 73.215 contains no provisions which would permit the consideration of supplemental showings in a contour overlap study. The provisions of § 73.215, as adopted in the *Report and Order* in MM Docket 87-121 require that the protected and interfering contours be determined using the provisions of § 73.313 subsections (c), (d)(2), and (d)(3) only.⁵ Moreover, the Commission in the *Memorandum Opinion and Order* in MM Docket 87-121 stated that these contour overlap rules do not incorporate terrain shielding or terrain roughness factors, and denied a petition alleging that such alternate showings were used to establish the provisions of § 73.215.⁶ Consequently, supplemental showings can not be employed in lieu of the contour overlap provisions of § 73.215.

Circle cites *New Life Enterprises, Inc.*, as justification for considering the overlap between its proposal and KOOL(FM) as *de minimis*. In *New Life Enterprises, Inc.*, the Commission defined *de minimis* overlap for cases that violated the Commission's multiple ownership rules (§ 73.3555). Based on the Commission's definition of *de minimis* overlap as related to § 73.3555, Circle asserts that the proposed overlap is also *de minimis*. However, Circle's proposed overlap would violate § 73.215(a), not § 73.3555. The difference between these two rule sections is whether interference will occur (§ 73.215) versus whether ownership is prohibited (§ 73.3555). Circle did not cite any precedent where the Commission considered overlap in violation of § 73.215 to be *de minimis*.

Circle's argues that KOOL(FM) and KMGN(FM) can not construct full Class C facilities because of local zoning and FAA constraints. The *Report and Order* in MM Docket 87-121 specifically rejects the notion that local zoning or FAA restrictions be taken into account when determining the protection to be afforded

⁴ The application, as originally filed, also violates § 73.215(e) with respect to KOOL(FM).

⁵ See *Report and Order* 4 FCC Rcd 1681, 54 Fed Reg 09800 (1989) and § 73.215(a)(3).

⁶ See *Memorandum Opinion and Order* 6 FCC Rcd 5356, 56 Fed Reg 57290 (1991)

to stations. The provisions of § 73.215(b)(2)(ii) assure that protected stations are not precluded from achieving maximum facilities for their class in the event of future zoning and FAA changes.

Decision. When an applicant seeks waiver of the Commissions rules it must plead with particularity the facts and circumstances which warrant grant of the waiver. *Columbia Communications Corp. v. FCC* 832 F.2d 189, 192 (D.C. Cir. 1987); *Rio Grande Family Radio Fellowship, Inc v. FCC*, 406 F.2d 644, 666 (D.C. Cir. 1968) (per curiam). We have afforded Circle's waiver request the "hard look" called for under the WAIT Doctrine, *WAIT Radio v. FCC*, 418 F2d 1153 (D.C. Cir. 1969), but find that the facts and circumstances set forth in the justification are insufficient to establish granting waiver of the Commissions rules.

For the reasons stated above, Circle's request for waiver of § 73.215 IS HEREBY DENIED.

The Commission has stated that:

we will not permit corrective amendment of defects that result from staff denial of a waiver request. We have also decided not to consider alternatives to waiver requests supplied in the event of denial of the waiver...even if the original application contains the curative information as an alternative.

See Report and Order in MM Docket 91-347 at paragraph 22, 57 Fed. Reg. 34872, 7 FCC Rcd 5074, 5079 (1992). Consequently, Circle will not be afforded an opportunity to amend the application to rectify the denied waiver request.

Accordingly, application BPH-950217IH IS HEREBY DISMISSED as being unacceptable for filing for violation of § 73.215 and the Informal Objection filed by Compass IS HEREBY DISMISSED as moot. This action is taken pursuant to 47 C.F.R. § 0.283.

Sincerely,



Dennis Williams
Chief, FM Branch
Audio Services Division
Mass Media Bureau

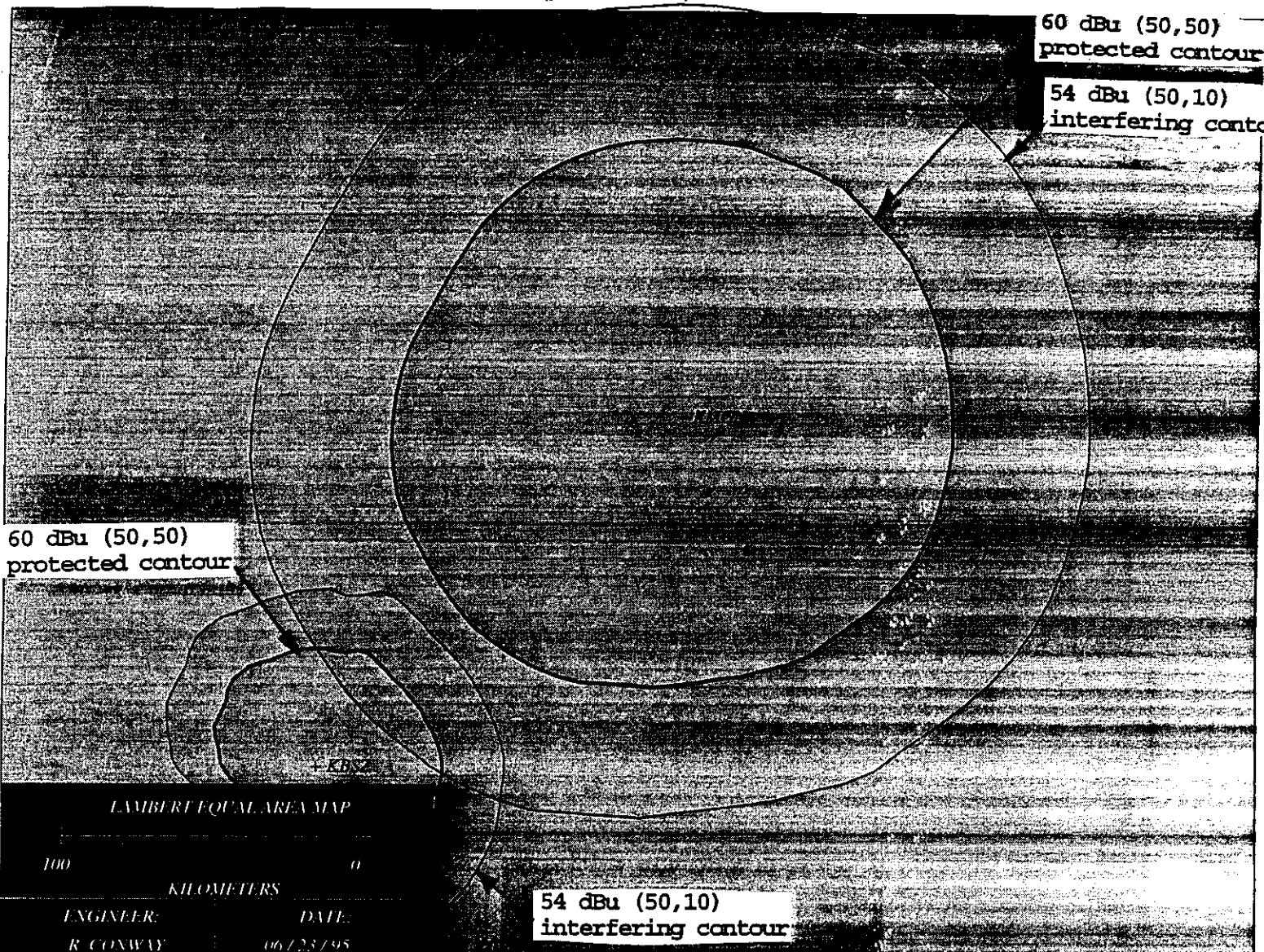
Enclosures

cc: Fisher Wayland Cooper Leader & Zaragoza L.L.P.
Shainis & Peltzman
D.L. Markley & Associates, Inc.
Compass Radio of Phoenix, Inc.

Exhibit #1

60 dBu (50,50)
protected contour

54 dBu (50,10)
interfering contour



THE FOLLOWING IS A LIST OF THE DATA WHICH APPEARS ON THE ABOVE MAP

BOTTOM LATITUDE: 33.39 TOP LATITUDE: 36.18 LEFT LONGITUDE: -113.50 RIGHT LONGITUDE: -109.82

MAP: ENLARGED CONUS MAP PROJECTION: Lambert Equal-area CENTER LAT: 34.78 LONG: -111.66 GRID SPACING: 0.00

KILOMETERS/INCH = 50.89

PLOT MADE ON: 23 June, 1995 11:01 HOURS

call	serv	city,state	application no.	contour	chan	erp	haat	rcams1	coverage area	A1	A7
KBSZ	FM	Wickenburg,AZ	BPH950217IH	60.0 dBu (50,50)	231C3	6.400	197.0	943.0	4771.1 sq km	0	0
KBSZ	FM	Wickenburg,AZ	BPH950217IH	54.0 dBu (50,10)	231C3	6.400	197.0	943.0	10547.0 sq km	0	0
KMGN	FM	Flagstaff,AZ	BMLH940818KG	60.0 dBu (50,50)	230C	100.000	600.0	2766.0	26169.2 sq km	0	0
KMGN	FM	Flagstaff,AZ	BMLH940818KG	54.0 dBu (50,10)	230C	100.000	600.0	2766.0	57938.3 sq km	0	0

A1 - Number of radials where free space equation was used for field strength calculations.

A7 - Number of radials where a HAAT less than 30 meters was adjusted to 30 meters.

* 10:58:02

FM Overlap Study

23-JUN-95 *

BPH950217IH APP KBSZ
 Wickenburg AZ US
 231C3 94.1 MHz Updated 950524
 Circle S Broadcasting Co., Inc.
 N Lat 33-55-32 W Lon 112-47-38

BMLH940818KG LIC KMGN
 Flagstaff AZ US
 230C 93.9 MHz Updated 950216
 Northland Broadcasting, Inc.
 N Lat 34-58- 8 W Lon 111-30-28

ERP HAAT RCAMSL
 + 6.400 kw 197. m 943. m
 / 6.400 kw 197. m 943. m
 DA:N Make: Mod:
 Rotation: degrees
 Is it 73.215: Y

-----ERP/HAAT CHANGES MADE-----
 ERP HAAT RCAMSL
 H 100.000 kw 600. m 2766. m
 V 100.000 kw 600. m 2766. m
 DA:N Make: Mod:
 Rotation: degrees
 Is it 73.215: N

KBSZ
 PROTECTED
 60.00 dBu

KMGN
 INTERFERING
 54.00 dBu

AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	ACTUAL (dBu)	IX (km)
0.0	6.400	216.9	40.6	237.72	100.000	639.1	139.7	53.67	
10.0	6.400	210.6	40.2	235.72	100.000	639.5	134.6	55.03	**
20.0	6.400	251.5	42.9	234.03	100.000	644.2	127.8	56.90	**
30.0	6.400	235.6	41.9	230.83	100.000	650.7	125.4	57.66	**
40.0	6.400	214.9	40.5	227.49	100.000	658.5	125.2	57.83	**
50.0	6.400	216.1	40.6	224.25	100.000	659.0	125.1	57.87	**
60.0	6.400	222.8	41.0	221.04	100.000	650.5	126.2	57.44	**
70.0	6.400	230.4	41.6	218.03	100.000	641.3	128.9	56.57	**
80.0	6.400	243.8	42.5	215.30	100.000	640.1	132.8	55.50	**
90.0	6.400	248.3	42.7	213.25	100.000	637.3	138.5	53.98	
100.0	6.400	242.3	42.4	212.03	100.000	634.1	145.3	52.20	
110.0	6.400	253.3	43.1	210.99	100.000	630.6	152.2	50.41	
120.0	6.400	251.1	42.9	210.79	100.000	629.9	159.7	48.55	
130.0	6.400	248.6	42.8	211.07	100.000	630.9	167.1	46.70	
140.0	6.400	248.1	42.7	211.70	100.000	633.0	174.3	44.98	
150.0	6.400	258.4	43.4	212.47	100.000	635.4	181.5	43.49	
160.0	6.400	254.9	43.2	213.79	100.000	638.4	187.7	42.36	
170.0	6.400	251.5	42.9	215.33	100.000	640.2	193.2	41.37	
180.0	6.400	239.3	42.2	217.13	100.000	640.6	197.5	40.57	
190.0	6.400	244.9	42.5	218.87	100.000	642.8	201.7	39.78	
200.0	6.400	230.8	41.6	220.87	100.000	649.8	203.9	39.45	
210.0	6.400	212.6	40.3	222.89	100.000	656.3	204.6	39.39	
220.0	6.400	168.7	36.7	224.91	100.000	659.7	202.0	39.93	
230.0	6.400	140.8	33.6	226.66	100.000	659.7	198.9	40.53	
240.0	6.400	108.6	29.8	228.10	100.000	657.0	194.4	41.36	
250.0	6.400	75.4	25.2	229.06	100.000	654.4	188.5	42.41	
260.0	6.400	64.9	23.5	230.01	100.000	652.1	185.2	42.98	
270.0	6.400	89.6	27.3	231.78	100.000	649.5	185.7	42.86	
280.0	6.400	106.9	29.6	233.40	100.000	646.0	184.1	43.12	
290.0	6.400	130.0	32.3	235.11	100.000	641.0	181.5	43.55	
300.0	6.400	147.2	34.3	236.59	100.000	638.5	177.5	44.34	
310.0	6.400	158.6	35.6	237.71	100.000	639.1	172.3	45.53	
320.0	6.400	195.3	39.0	239.31	100.000	642.0	166.7	46.95	
330.0	6.400	201.7	39.5	239.65	100.000	642.5	159.9	48.66	
340.0	6.400	192.9	38.8	239.12	100.000	641.6	153.2	50.31	
350.0	6.400	203.4	39.6	238.66	100.000	640.6	146.4	51.99	
360.0	6.400	216.9	40.6	237.72	100.000	639.1	139.7	53.67	

* 10:58:02

FM Overlap Study

23-JUN-95

KBSZ
PROTECTED
60.00 dBu

KMGN
INTERFERING
54.00 dBu

AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	ACTUAL (dBu)	IX (km)
0.0	6.400	216.9	40.6	237.72	100.000	639.1	139.7	53.67	0.00
1.0	6.400	217.6	40.7	237.58	100.000	638.9	139.1	53.83	0.00
2.0	6.400	219.6	40.8	237.46	100.000	638.8	138.5	54.00	0.01
3.0	6.400	221.4	40.9	237.33	100.000	638.7	137.8	54.17	0.65
4.0	6.400	222.7	41.0	237.18	100.000	638.6	137.2	54.33	1.27
5.0	6.400	221.1	40.9	236.96	100.000	638.5	136.7	54.46	1.76
6.0	6.400	218.9	40.8	236.72	100.000	638.5	136.2	54.58	2.22
7.0	6.400	216.0	40.6	236.46	100.000	638.6	135.8	54.69	2.62
8.0	6.400	214.2	40.4	236.22	100.000	638.7	135.4	54.80	3.07
9.0	6.400	213.0	40.3	235.98	100.000	639.0	134.9	54.93	3.54
10.0	6.400	210.6	40.2	235.72	100.000	639.5	134.6	55.03	3.94
11.0	6.400	208.2	40.0	235.46	100.000	640.1	134.2	55.14	4.33
12.0	6.400	207.1	39.9	235.21	100.000	640.7	133.8	55.25	4.77
13.0	6.400	211.2	40.2	235.08	100.000	641.1	133.1	55.44	5.49
14.0	6.400	216.3	40.6	234.95	100.000	641.4	132.3	55.65	6.25
15.0	6.400	221.3	40.9	234.81	100.000	641.8	131.6	55.85	7.00
16.0	6.400	226.3	41.3	234.66	100.000	642.3	130.9	56.05	7.74
17.0	6.400	232.9	41.7	234.53	100.000	642.7	130.1	56.27	8.56
18.0	6.400	240.1	42.2	234.39	100.000	643.1	129.3	56.50	9.40
19.0	6.400	246.7	42.6	234.23	100.000	643.6	128.5	56.71	10.19
20.0	6.400	251.5	42.9	234.03	100.000	644.2	127.8	56.90	10.90
21.0	6.400	253.9	43.1	233.78	100.000	645.0	127.3	57.06	11.47
22.0	6.400	254.1	43.1	233.50	100.000	645.8	126.9	57.18	11.91
23.0	6.400	253.4	43.1	233.19	100.000	646.6	126.6	57.29	12.29
24.0	6.400	252.4	43.0	232.88	100.000	647.4	126.3	57.38	12.63
25.0	6.400	251.0	42.9	232.56	100.000	648.1	126.0	57.46	12.93
26.0	6.400	248.4	42.7	232.22	100.000	648.8	125.8	57.52	13.15
27.0	6.400	244.7	42.5	231.87	100.000	649.4	125.7	57.56	13.28
28.0	6.400	240.8	42.3	231.51	100.000	649.9	125.6	57.58	13.37
29.0	6.400	237.8	42.1	231.17	100.000	650.3	125.6	57.62	13.48
30.0	6.400	235.6	41.9	230.83	100.000	650.7	125.4	57.66	13.63
31.0	6.400	233.7	41.8	230.50	100.000	651.2	125.3	57.70	13.78
32.0	6.400	231.9	41.7	230.17	100.000	651.8	125.2	57.73	13.91
33.0	6.400	230.4	41.6	229.83	100.000	652.5	125.1	57.78	14.04
34.0	6.400	229.1	41.5	229.50	100.000	653.2	125.0	57.82	14.21
35.0	6.400	227.4	41.4	229.17	100.000	654.1	124.9	57.84	14.31
36.0	6.400	224.9	41.2	228.83	100.000	655.1	124.9	57.85	14.31
37.0	6.400	221.2	40.9	228.48	100.000	656.0	125.0	57.84	14.21
38.0	6.400	217.7	40.7	228.14	100.000	656.9	125.2	57.81	14.21
39.0	6.400	215.6	40.5	227.81	100.000	657.7	125.2	57.81	14.21
40.0	6.400	214.9	40.5	227.49	100.000	658.5	125.2	57.83	14.21
41.0	6.400	214.7	40.5	227.16	100.000	659.1	125.1	57.86	14.31
42.0	6.400	214.7	40.5	226.84	100.000	659.5	125.0	57.88	14.5
43.0	6.400	215.1	40.5	226.52	100.000	659.8	125.0	57.91	14.6
44.0	6.400	215.6	40.5	226.19	100.000	660.0	124.9	57.93	14.6
45.0	6.400	215.9	40.5	225.87	100.000	660.1	124.9	57.93	14.6
46.0	6.400	215.9	40.6	225.55	100.000	660.0	124.9	57.93	14.6
47.0	6.400	215.9	40.6	225.22	100.000	659.9	124.9	57.92	14.6
48.0	6.400	215.9	40.6	224.90	100.000	659.7	124.9	57.91	14.5
49.0	6.400	215.9	40.6	224.57	100.000	659.3	125.0	57.89	14.4
50.0	6.400	215.9	40.6	224.25	100.000	659.0	125.1	57.87	14.4

52.0	6.400	218.1	40.8	223.27	100.000	657.2	125.1	57.82	14.24
53.0	6.400	219.4	40.8	223.27	100.000	656.4	125.2	57.79	14.12
54.0	6.400	220.1	40.9	222.94	100.000	655.6	125.4	57.74	13.94
55.0	6.400	220.4	40.9	222.62	100.000	654.7	125.5	57.69	13.77
56.0	6.400	220.9	40.9	222.30	100.000	653.8	125.6	57.64	13.59
57.0	6.400	221.7	41.0	221.98	100.000	652.7	125.8	57.59	13.39
58.0	6.400	222.5	41.0	221.66	100.000	651.6	126.0	57.52	13.14
59.0	6.400	222.9	41.1	221.35	100.000	650.5	126.2	57.44	12.85
60.0	6.400	222.8	41.0	221.04	100.000	649.3	126.5	57.35	12.53
61.0	6.400	222.7	41.0	220.74	100.000	648.1	126.7	57.26	12.20
62.0	6.400	222.5	41.0	220.44	100.000	647.0	127.0	57.17	11.86
63.0	6.400	222.4	41.0	220.14	100.000	646.0	127.3	57.07	11.50
64.0	6.400	222.2	41.0	219.85	100.000	644.9	127.6	56.97	11.14
65.0	6.400	222.1	41.0	219.56	100.000	644.0	127.9	56.88	10.80
66.0	6.400	222.7	41.0	219.26	100.000	643.0	128.2	56.80	10.52
67.0	6.400	224.3	41.2	218.96	100.000	642.3	128.4	56.73	10.27
68.0	6.400	226.6	41.3	218.64	100.000	641.7	128.6	56.66	10.00
69.0	6.400	228.8	41.5	218.33	100.000	641.0	128.9	56.57	9.69
70.0	6.400	230.4	41.6	218.03	100.000	641.3	129.2	56.48	9.34
71.0	6.400	231.6	41.7	217.74	100.000	641.0	129.6	56.38	8.97
72.0	6.400	232.7	41.7	217.46	100.000	640.8	130.0	56.28	8.60
73.0	6.400	233.9	41.8	217.18	100.000	640.6	130.3	56.18	8.22
74.0	6.400	234.9	41.9	216.90	100.000	640.6	130.7	56.07	7.81
75.0	6.400	235.9	41.9	216.63	100.000	640.5	131.2	55.96	7.39
76.0	6.400	237.0	42.0	216.37	100.000	640.4	131.5	55.85	7.00
77.0	6.400	238.8	42.1	216.09	100.000	640.4	132.0	55.74	6.59
78.0	6.400	240.6	42.3	215.82	100.000	640.3	132.4	55.63	6.17
79.0	6.400	242.6	42.4	215.55	100.000	640.2	132.8	55.50	5.69
80.0	6.400	243.8	42.5	215.30	100.000	640.1	133.3	55.38	5.23
81.0	6.400	245.5	42.6	215.04	100.000	639.9	133.8	55.24	4.73
82.0	6.400	246.8	42.6	214.80	100.000	639.7	134.3	55.10	4.21
83.0	6.400	248.0	42.7	214.57	100.000	639.5	134.8	54.96	3.65
84.0	6.400	248.8	42.8	214.35	100.000	639.2	135.4	54.81	3.08
85.0	6.400	249.1	42.8	214.14	100.000	639.0	136.0	54.65	2.47
86.0	6.400	249.0	42.8	213.95	100.000	638.7	136.6	54.49	1.86
87.0	6.400	249.1	42.8	213.76	100.000	638.4	137.2	54.32	1.22
88.0	6.400	248.8	42.8	213.58	100.000	638.1	137.8	54.15	0.58
89.0	6.400	248.5	42.8	213.41	100.000	637.7	138.5	53.98	0.00
90.0	6.400	248.3	42.7	213.25	100.000	637.3			

* 10:58:02

FM Overlap Study

23-JUN-95

BMLH940818KG LIC KMGN
 Flagstaff AZ US
 230C 93.9 MHz Updated 950216
 Northland Broadcasting, Inc.
 N Lat 34-58- 8 W Lon 111-30-28

BPH950217IH APP KBSZ
 Wickenburg AZ US
 231C3 94.1 MHz Updated 950524
 Circle S Broadcasting Co., Inc.
 N Lat 33-55-32 W Lon 112-47-38

-----ERP/HAAT CHANGES MADE-----

ERP HAAT RCAMSL
 H 100.000 kw 600. m 2766. m
 V 100.000 kw 600. m 2766. m
 DA:N Make: Mod:
 Rotation: degrees
 Is it 73.215: N

ERP HAAT RCAMSL
 H 6.400 kw 197. m 943. m
 V 6.400 kw 197. m 943. m
 DA:N Make: Mod:
 Rotation: degrees
 Is it 73.215: Y

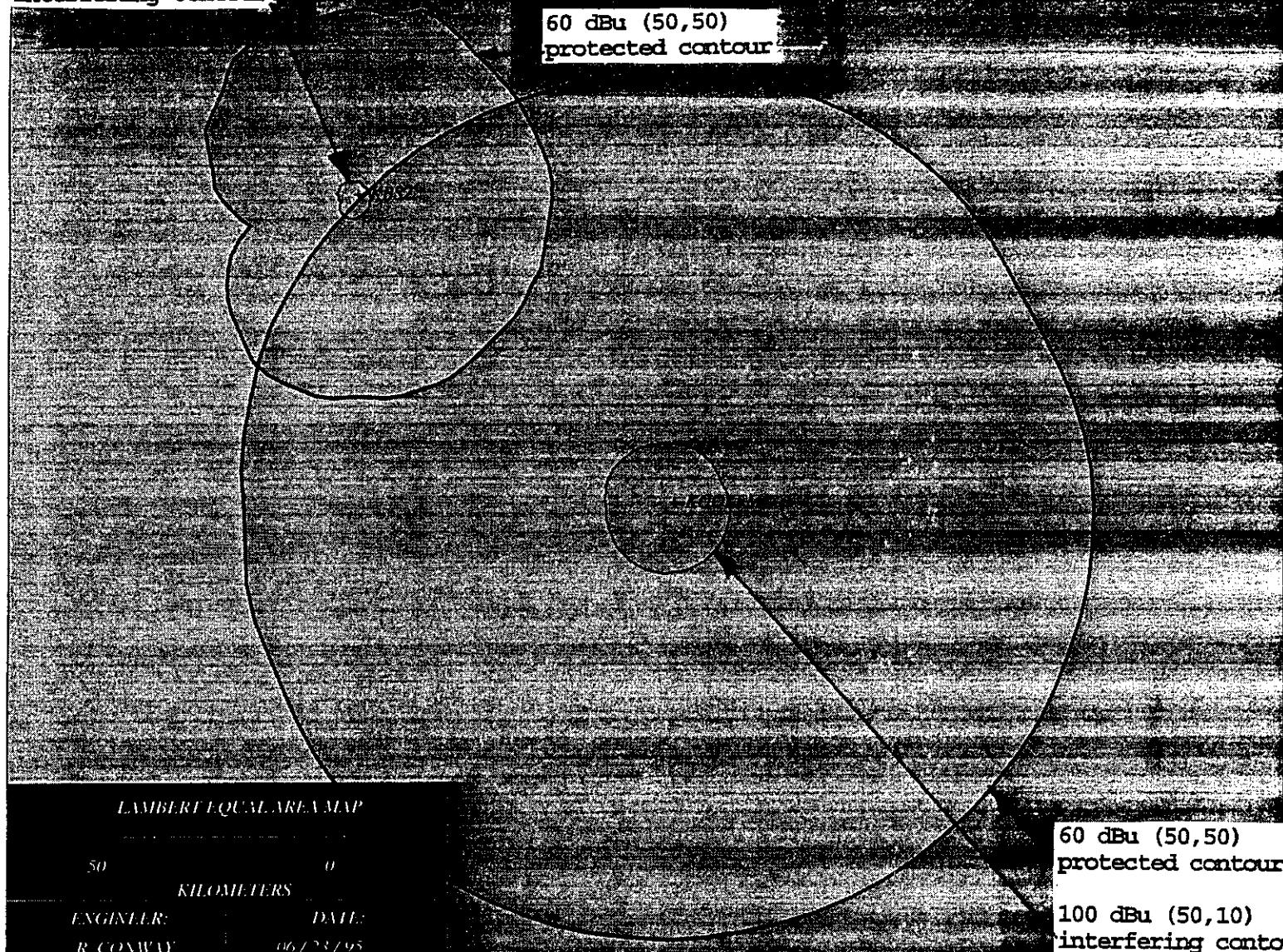
KMGN
 PROTECTED
 60.00 dBu

KBSZ
 INTERFERING
 54.00 dBu

AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	ACTUAL (dBu)	IX (km)
0.0	100.000	609.7	92.2	29.04	6.400	237.7	239.0	15.26	
10.0	100.000	615.9	92.4	32.42	6.400	231.2	246.4	13.86	
20.0	100.000	612.7	92.3	35.91	6.400	225.2	251.7	12.80	
30.0	100.000	644.6	93.5	39.40	6.400	215.2	256.7	11.74	
40.0	100.000	646.7	93.6	43.00	6.400	215.1	258.7	11.39	
50.0	100.000	639.8	93.3	46.61	6.400	215.9	258.6	11.43	
60.0	100.000	617.5	92.5	50.18	6.400	216.2	256.1	11.85	
70.0	100.000	590.8	91.5	53.67	6.400	219.9	251.7	12.70	
80.0	100.000	580.8	91.1	57.10	6.400	221.8	246.2	13.71	
90.0	100.000	583.2	91.2	60.50	6.400	222.8	239.4	14.90	
100.0	100.000	583.7	91.2	63.78	6.400	222.2	231.0	16.32	
110.0	100.000	585.6	91.3	66.93	6.400	224.2	221.0	18.05	
120.0	100.000	582.7	91.1	69.85	6.400	230.2	209.5	20.04	
130.0	100.000	559.8	90.1	72.30	6.400	233.0	196.3	22.39	
140.0	100.000	524.1	88.2	74.05	6.400	235.0	181.7	25.21	
150.0	100.000	528.2	88.4	75.92	6.400	236.9	167.4	27.81	
160.0	100.000	499.4	86.7	76.44	6.400	237.8	152.1	30.52	
170.0	100.000	486.0	85.9	76.34	6.400	237.6	137.1	33.30	
180.0	100.000	494.6	86.4	75.61	6.400	236.5	122.1	36.21	
190.0	100.000	520.9	88.0	73.81	6.400	234.7	107.3	39.56	
200.0	100.000	584.3	91.2	70.61	6.400	231.2	92.3	43.86	
210.0	100.000	627.3	92.9	63.53	6.400	222.3	80.2	47.40	
220.0	100.000	646.5	93.6	52.60	6.400	218.9	72.9	49.65	
230.0	100.000	652.1	93.8	39.69	6.400	215.0	72.2	49.75	
240.0	100.000	643.0	93.5	28.11	6.400	240.4	78.2	48.68	
250.0	100.000	667.3	94.4	19.13	6.400	247.4	88.2	45.69	
260.0	100.000	652.2	93.8	14.14	6.400	217.0	102.4	40.37	
270.0	100.000	630.8	93.0	11.83	6.400	206.9	118.1	36.35	
280.0	100.000	592.4	91.5	11.54	6.400	207.1	134.2	33.16	
290.0	100.000	546.5	89.5	12.61	6.400	209.2	149.9	30.30	
300.0	100.000	531.5	88.6	13.99	6.400	216.2	165.0	27.83	
310.0	100.000	553.6	89.8	15.34	6.400	222.8	180.0	25.29	
320.0	100.000	586.4	91.3	17.21	6.400	234.5	194.7	22.71	
330.0	100.000	614.1	92.3	19.64	6.400	250.0	208.3	20.64	
340.0	100.000	617.0	92.5	22.56	6.400	253.8	220.1	18.80	
350.0	100.000	615.2	92.4	25.72	6.400	249.3	230.4	16.98	
360.0	100.000	609.7	92.2	29.04	6.400	237.7	239.0	15.26	

interfering contour

60 dBu (50,50)
protected contour



THE FOLLOWING IS A LIST OF THE DATA WHICH APPEARS ON THE ABOVE MAP

BOTTOM LATITUDE: 32.47 TOP LATITUDE: 34.33 LEFT LONGITUDE: -113.33 RIGHT LONGITUDE: -110.88

MAP: ENLARGED CONUS MAP PROJECTION: Lambert Equal-area CENTER LAT: 33.40 LONG: -112.10 GRID SPACING: 0.00

KILOMETERS/INCH = 33.83

PLOT MADE ON: 23 June, 1995 11:05 HOURS

call	serv	city,state	application no.	contour	chan	erp	haat	rcamsl	coverage area	A1	A7
KBSZ	FM	Wickenburg,AZ	BPH950217IH	60.0 dBu (50,50)	231C3	6.400	197.0	943.0	4771.1 sq km	0	0
KBSZ	FM	Wickenburg,AZ	BPH950217IH	100.0 dBu (50,10)	231C3	6.400	197.0	943.0	42.5 sq km	0	0
KOOLFM	FM	Phoenix,AZ	BLH860112KB	60.0 dBu (50,50)	233C	100.000	600.0	967.0	26415.3 sq km	0	0
KOOLFM	FM	Phoenix,AZ	BLH860112KB	100.0 dBu (50,10)	233C	100.000	600.0	967.0	587.2 sq km	0	0

A1 - Number of radials where free space equation was used for field strength calculations.

A7 - Number of radials where a HAAT less than 30 meters was adjusted to 30 meters.

* 10:58:02

FM Overlap Study

23-JUN-95 *

BPH950217IH APP KBSZ
Wickenburg AZ US
231C3 94.1 MHz Updated 950524
Circle S Broadcasting Co., Inc.
N Lat 33-55-32 W Lon 112-47-38

BLH860112KB LIC KOOLFM
Phoenix AZ US
233C 94.5 MHz Updated 921004
Adams Radio of Phoenix, Inc.
N Lat 33-20- 2 W Lon 112- 3-42

ERP HAAT RCAMSL
H 6.400 kw 197. m 943. m
V 6.400 kw 197. m 943. m
DA:N Make: Mod:
Rotation: degrees
Is it 73.215: Y

-----ERP/HAAT CHANGES MADE-----
ERP HAAT RCAMSL
H 100.000 kw 600. m 967. m
V 100.000 kw 600. m 967. m
DA:N Make: Mod:
Rotation: degrees
Is it 73.215: N

KBSZ
PROTECTED
60.00 dBu

KOOL
INTERFERING
100.00 dBu

AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	ACTUAL (dBu)	IX (km)
0.0	6.400	216.9	40.6	327.76	100.000	629.2	126.1	57.18	
10.0	6.400	210.6	40.2	330.26	100.000	627.6	121.5	58.44	
20.0	6.400	251.5	42.9	333.68	100.000	624.5	118.6	59.24	
30.0	6.400	235.6	41.9	335.61	100.000	622.6	112.2	61.00	
40.0	6.400	214.9	40.5	336.90	100.000	621.8	105.3	62.82	
50.0	6.400	216.1	40.6	338.45	100.000	621.4	98.8	64.56	
60.0	6.400	222.8	41.0	339.74	100.000	620.9	92.0	66.54	
70.0	6.400	230.4	41.6	340.46	100.000	620.5	84.9	68.78	
80.0	6.400	243.8	42.5	340.64	100.000	620.4	77.5	71.12	
90.0	6.400	248.3	42.7	339.32	100.000	621.1	70.3	73.44	
100.0	6.400	242.3	42.4	336.08	100.000	622.3	63.9	75.53	
110.0	6.400	253.3	43.1	331.94	100.000	626.3	57.8	77.67	
120.0	6.400	251.1	42.9	325.42	100.000	631.6	53.8	79.19	
130.0	6.400	248.6	42.8	317.59	100.000	636.8	51.9	79.96	
140.0	6.400	248.1	42.7	309.38	100.000	640.9	52.2	79.91	
150.0	6.400	258.4	43.4	301.53	100.000	637.7	54.1	79.16	
160.0	6.400	254.9	43.2	295.54	100.000	631.2	58.8	77.38	
170.0	6.400	251.5	42.9	291.41	100.000	621.7	64.9	75.19	
180.0	6.400	239.3	42.2	289.37	100.000	615.1	71.9	72.82	
190.0	6.400	244.9	42.5	287.83	100.000	609.7	79.0	70.46	
200.0	6.400	230.8	41.6	288.23	100.000	611.2	86.4	68.13	
210.0	6.400	212.6	40.3	289.56	100.000	615.8	93.4	66.05	
220.0	6.400	168.7	36.7	292.65	100.000	625.2	99.0	64.57	
230.0	6.400	140.8	33.6	295.54	100.000	631.2	103.5	63.42	
240.0	6.400	108.6	29.8	298.74	100.000	635.8	106.7	62.66	
250.0	6.400	75.4	25.2	302.25	100.000	638.3	107.9	62.36	
260.0	6.400	64.9	23.5	304.38	100.000	640.0	110.0	61.83	
270.0	6.400	89.6	27.3	304.93	100.000	640.4	115.7	60.27	
280.0	6.400	106.9	29.6	306.43	100.000	641.2	120.2	59.00	
290.0	6.400	130.0	32.3	308.31	100.000	641.3	124.7	57.73	
300.0	6.400	147.2	34.3	310.64	100.000	640.3	128.0	56.80	
310.0	6.400	158.6	35.6	313.27	100.000	639.0	130.0	56.25	
320.0	6.400	195.3	39.0	316.11	100.000	637.6	133.3	55.34	
330.0	6.400	201.7	39.5	319.06	100.000	636.2	132.9	55.44	
340.0	6.400	192.9	38.8	321.85	100.000	635.1	130.4	56.08	
350.0	6.400	203.4	39.6	324.79	100.000	632.4	128.6	56.53	
360.0	6.400	216.9	40.6	327.76	100.000	629.2	126.1	57.18	

* 10:58:02

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23-JUN-95

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 Is it 73.215: Y

KOOL
 PROTECTED
 60.00 dBu

KBSZ
 INTERFERING
 100.00 dBu

AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	AZIMUTH (degrees)	ERP (kw)	HAAT (m)	DIST (km)	ACTUAL (dBu)	IX (km)
0.0	100.000	616.6	92.4	68.23	6.400	227.2	72.5	50.09	
10.0	100.000	616.5	92.4	72.93	6.400	233.8	87.3	45.54	
20.0	100.000	621.8	92.6	77.62	6.400	239.9	101.5	41.36	
30.0	100.000	609.3	92.2	82.67	6.400	247.5	114.5	38.13	
40.0	100.000	589.6	91.4	87.77	6.400	248.9	126.4	35.64	
50.0	100.000	556.5	90.0	93.02	6.400	245.0	136.7	33.52	
60.0	100.000	528.1	88.4	98.20	6.400	240.0	145.8	31.71	
70.0	100.000	541.3	89.2	102.80	6.400	245.2	155.5	30.06	
80.0	100.000	569.4	90.6	107.38	6.400	250.9	164.6	28.53	
90.0	100.000	580.4	91.1	112.19	6.400	250.9	171.8	27.30	
100.0	100.000	584.3	91.2	117.07	6.400	248.4	177.4	26.28	
110.0	100.000	585.4	91.3	121.98	6.400	252.3	181.6	25.56	
120.0	100.000	590.7	91.5	126.88	6.400	248.3	184.5	24.92	
130.0	100.000	597.4	91.7	131.80	6.400	248.2	186.1	24.60	
140.0	100.000	601.3	91.9	136.73	6.400	249.7	186.1	24.62	
150.0	100.000	609.6	92.2	141.67	6.400	246.1	184.9	24.79	
160.0	100.000	609.8	92.2	146.61	6.400	256.7	182.0	25.55	
170.0	100.000	610.0	92.2	151.55	6.400	260.4	177.7	26.42	
180.0	100.000	612.5	92.3	156.49	6.400	260.0	172.1	27.39	
190.0	100.000	612.8	92.3	161.42	6.400	256.5	165.2	28.53	
200.0	100.000	610.8	92.2	166.33	6.400	255.0	156.9	29.98	
210.0	100.000	607.5	92.1	171.21	6.400	248.0	147.4	31.58	
220.0	100.000	607.7	92.1	176.10	6.400	238.3	136.8	33.35	
230.0	100.000	601.1	91.9	180.89	6.400	240.2	125.1	35.70	
240.0	100.000	575.3	90.8	185.29	6.400	244.1	112.0	38.62	
250.0	100.000	564.5	90.4	189.75	6.400	245.1	98.5	42.41	
260.0	100.000	574.6	90.8	194.57	6.400	236.9	84.7	46.48	
270.0	100.000	561.4	90.2	198.54	6.400	231.7	69.8	51.17	
280.0	100.000	588.0	91.4	203.68	6.400	226.2	54.9	56.38	
290.0	100.000	617.3	92.5	208.95	6.400	215.9	39.5	62.42	
300.0	100.000	636.7	93.2	213.75	6.400	194.4	23.5	70.70	
310.0	100.000	640.6	93.4	213.03	6.400	198.8	7.2	90.14	
320.0	100.000	635.9	93.2	54.60	6.400	220.3	9.3	86.79	
330.0	100.000	627.8	92.9	55.29	6.400	220.4	25.6	70.26	
340.0	100.000	620.8	92.6	59.25	6.400	222.9	41.6	61.76	
350.0	100.000	618.1	92.5	63.63	6.400	222.3	57.3	55.30	
360.0	100.000	616.6	92.4	68.23	6.400	227.2	72.5	50.09	