

KZHK(FM)
St. George, UT
Proposed Minor Modification
Of Licensed Facility

CONTINGENT Application Overview:

In MB Docket 05-135, Channel 240C was deleted at St. George, UT, and mutually exclusive Channel 240C was added at Bunkerville, Nevada, for use by KZHK(FM). Pursuant to the Report and Order in that docket, KZHK(FM) was issued minor change Construction Permit BPH-20050404AED in order to implement the community change. That Construction Permit was never implemented and the KZHK(FM) licensee desires to remain in St. George, UT, and continue operating with its currently licensed facilities in BLH-19970130AED. To the extent necessary for the station to continue to operate with its licensed facilities, KZHK(FM) is filing this application to formally propose a community of license change back to St. George that complies with the Commission's technical rules and Section 307(b).

To the extent a showing concerning the fact that KZHK(FM) will continue to operate from its licensed facilities is necessary, the licensee offers the following: KZHK(FM) has never commenced service at Bunkerville, and thus there will be no loss of service to residents of that community and the proposed service area, as the station never commenced operations. However, in an abundance of caution, KHIJ(FM), licensed to College Creek Media, LLC, contingently proposes to change its city of license from Mesquite, NV, and instead operate on mutually exclusive Channel 244C at Bunkerville to provide Bunkerville's with a local transmission service. As Mesquite is currently well served by five local transmission services, the removal of that community's fifth local service would not detrimentally impact Section 307(b). Therefore, as will be shown in the Comprehensive Technical Exhibits to both stations' applications and the

Consolidated Section 307(b) Showing, the KZHK(FM) community change from Bunkerville, NV, to St. George, UT, coupled with the contingent KHIJ(FM) community change from Mesquite, NV, to Bunkerville, NV, complies with the Commission's technical rules and furthers the Commission's allotment priorities under Section 307(b), to the extent such a showing is necessary.

KZHK(FM) (FCC Facility ID# 40519) proposes to modify its currently Licensed Facilities using the following parameters:

Tech Box:

Channel:	240
Class:	C
Antenna Coordinates:	N36-50-49, W113-29-28 (NAD 27)
Allotment Ref. Coordinates:	N37-03-49, W113-34-24 (NAD 27)
ASRN:	1032820
Tower Height AGL:	111.1 m
COR AMSL:	1960 m
COR AGL:	70 m
COR HAAT:	595 m
ERP:	100 kW
Directional Antenna:	No

Allotment Modifications:

KZHK(FM) proposes a change in community of license from Bunkerville, NV to St. George, UT. As such, Exhibit 1 is an allotment reference site channel spacings study for

KZHK(FM) on Channel 240C at St. George, UT, demonstrating that the proposed facility is fully spaced pursuant to Section 73.207 towards all other authorizations, allotments, and proposals from the following location:

Allotment Reference Coordinates: N37-03-49, W113-34-24 (NAD 27)

Allotment Site City-Grade Coverage:

In accordance with the city grade coverage requirements of Section 73.315, Exhibit 2 demonstrates that the proposed allotment site provides requisite coverage of KZHK(FM)'s community of license – St. George, UT. As can be seen in the Exhibit, 100% of St. George's community boundaries are encompassed by the theoretical 70 dBu, circle contour. Also, no terrain obstructions are located between the antenna site and the community.

Suitable Allotment Reference Site:

In accordance with Note 1 to Section 73.3573, the proposed allotment site is located at an existing tower farm within the city limits of St. George.

Antenna Site City-Grade Coverage:

Exhibit 4 demonstrates that the proposed facility's antenna site provides city grade coverage of KZHK(FM)'s community of license – St. George, UT. As can be seen in the Exhibit, 100% of St. George's community boundaries are encompassed by the F(50,50) 70 dBu contour of the proposed facility. Also, no major terrain obstructions are located between the antenna site and the community.

Interference Study (Requesting Section 73.215 Contour Protection):

Exhibit 5 is a channel spacings study from the proposed KZHK(FM) antenna site. It notes that the proposed KZHK(FM) antenna site would otherwise be slightly shortspaced to:

- KKLD(FM) Cottonwood, AZ 240C0 (see BLH-20061020ABZ)

It is understood that KKLD(FM) specified Section 73.215 processing to protect the licensed coordinates of KZHK(FM). As the instant application is filed for KZHK(FM) to simply remain at those coordinates with the current licensed facilities, KZHK(FM) does not believe that any protection of KKLD(FM) is required.

However, to the extent the Commission deems it necessary, KZHK(FM) is eligible to request 73.215 Contour Protection towards KKLD(FM) as it complies with the minimum separation requirements on its Co channel at its proposed antenna site. The channel spacings study in Exhibit 5 shows that the proposed KZHK(FM) 240C antenna location is spaced 270 kilometers from the KKLD(FM) site. In order to be eligible for 73.215 Contour Protection, the minimum “C to C0” spacing for Co channel stations must be at least 270 kilometers. The proposed KZHK(FM) 240C antenna site satisfies this requirement by 0 kilometers.

Using the facilities proposed herein, KZHK(FM) 240C complies with the contour protection requirements of Section 73.215 towards KKLD(FM). The attached map in Exhibit 5A demonstrates that this application complies with the contour protection requirements of Section 73.215.

In reviewing the attached studies, it should be noted that since KKLD(FM) does not utilize maximum Class C0 facilities, the following overlap studies were conducted assuming “Maximized” Class C0 Facilities for KKLD(FM) (100 kW at an HAAT of 450 meters).

Using the KZHK(FM) 240C technical parameters proposed in this application, Exhibit 5A demonstrates that the proposed KZHK(FM) F(50,50) 60 dBu Protected Contour does not overlap the F(50,10) 40 dBu Interfering Contour of KKLD(FM) operations on Channel 240C0. Likewise, Exhibit 5A demonstrates that the F(50,50) 60 dBu Protected Contour for KKLD(FM) does not overlap the proposed F(50,10) 40 dBu Interfering Contour of the instant KZHK(FM) application on 240C. Therefore, it appears as though the instant application meets the requirements of Section 73.215 towards KKLD(FM).

As noted in the attached spacing study, KZHK(FM) notes that there is also an indication in the Commission's database that an applicant in FCC Auction No. 79 specified preferred coordinates that are shortspaced to the current licensed facilities of KZHK(FM). KZHK(FM) submits that, as it is still licensed at its current site, that specification of coordinates should not be permissible. However, as noted in the spacing study, the applicant has informed KZHK(FM) that when the freeze on changing coordinates for auction channels is lifted, the applicant will specify a new site.

Downward Radiation Study

The site is the current transmitter site of KZHK(FM) and it is not believed that any radiation hazard presently exists at the site. Even though the site fully complies with the Uncontrolled Site Standards, access to the transmitting site is restricted and appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency radiation will not exceed the FCC guidelines.

Existing Tower:

The proposed facility is exempt from environmental processing because the facility is not located at a location specified in Section 1.1307(a)(1)-(8) of the Commission's Rules and since the tower in question already exists.

Exhibit 1

Allotment Reference Site Channel Spacings Study

ADD 240C St. George, UT
Allotment Site Channel Spacings Study

REFERENCE
37 03 49.0 N.
113 34 24.0 W.

CLASS = C
Current Spacings

DISPLAY DATES
DATA 07-25-09
SEARCH 07-30-09

----- Channel 240 - 95.9 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
KZHK	LIC 240C	St. George	UT	163.1	25.13	289.5 -264.37

Of Note:
Currently authorized facility for KZHK.

KZHK	CP 240C	Bunkerville	NV	225.9	68.19	289.5 -221.31
AL3165	RSV 240C	Bunkerville	NV	253.6	83.96	289.5 -205.54

Of Note:
Mutually Exclusive allotment and construction permit for KZHK(FM) to operate at Bunkerville, NV.

1323556	APP 239C	Salina	UT	36.2	183.01	240.5 -57.49
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Of Concern:
In the short form filing window for FM Auction #79, I-Four Media, LLC, requested preferred allotment coordinates at this site for the facility. The applicant has contacted I-Four regarding this preferred site and I-Four indicated that it was not "married" to the site and was willing to use the original allotment site for the auction station (see entry below). I-Four has, since, attempted to amend its preferred coordinates and was not successful due to limitations in the Auctions Web System. I-Four has also indicated its willingness to accept an alternate substitute channel. However, due to Auction #79 rules and the freeze that is in effect, I-Four is unable to either amend its preferred coordinates or its channel until after the long-form filing window has closed although it is perfectly willing to do so.

AU7910924VAC	239C	Salina	UT	34.2	241.29	240.5 0.79
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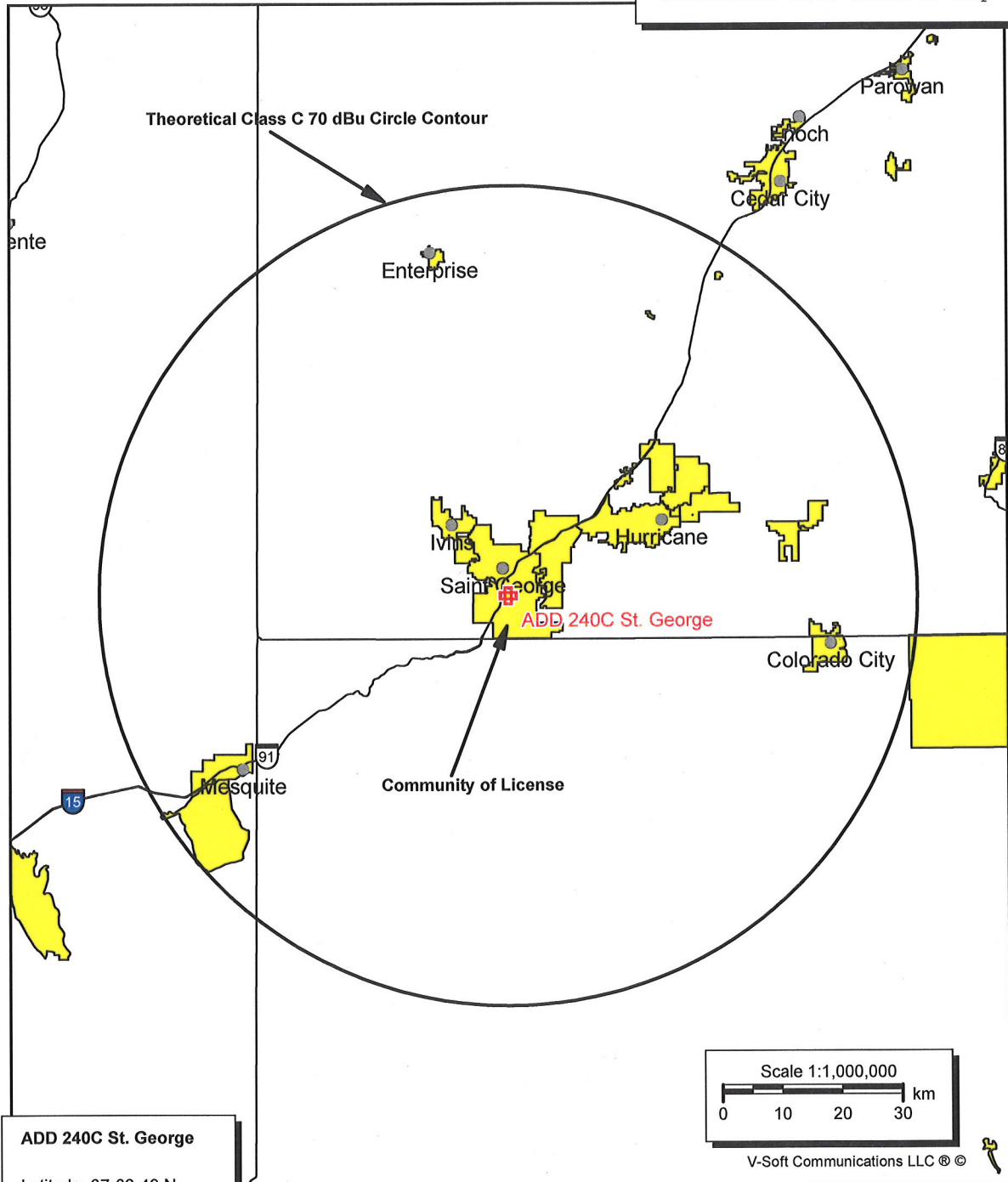
Of Note:
Original Allotment Site for the Salina, UT, station in Auction 79.

KKLD	LIC-N 240C0	Cottonwood	AZ	153.2	294.72	280.5 14.22
R10995	ADD 239C3	Seligman	AZ	159.2	206.26	175.5 30.76
KMGR	LIC 240C1	Delta	UT	25.1	328.74	269.5 59.24

Exhibit 2

Allotment Reference Site City-Grade Coverage Map

Allotment Site Contour Map



ADD 240C St. George

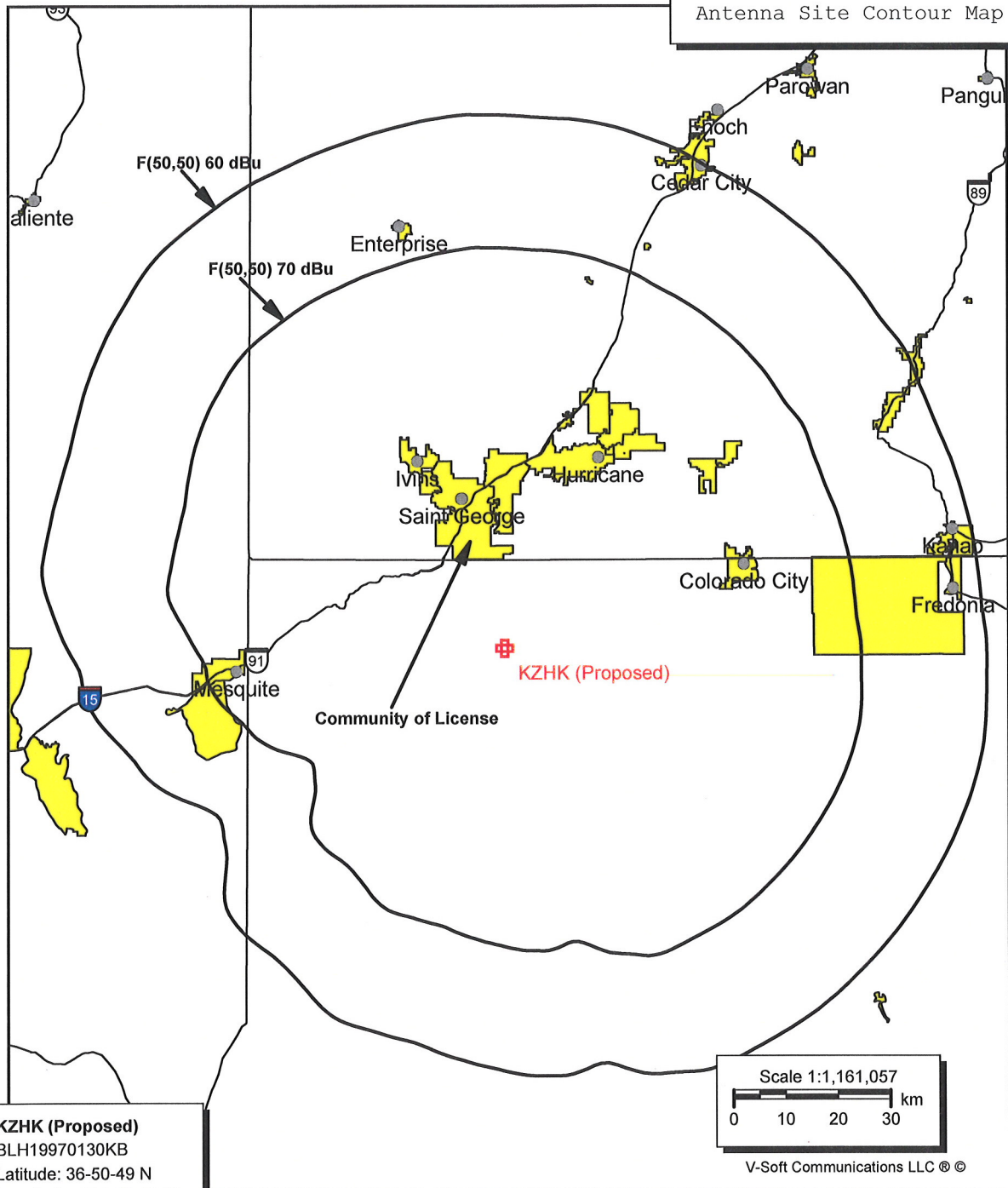
Latitude: 37-03-49 N
Longitude: 113-34-24 W
ERP: 100.00 kW
HAAT: 600.0 m
Channel: 240 C
Frequency: 95.9 MHz
AMSL Height: 1510.54 m
Elevation: 949.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Exhibit 4

Proposed Antenna Site Contour Map:

**F(50,50) Protected Contour
F(50,50) City-Grade Contour**

KZHK(FM) 240C St. George, UT
Antenna Site Contour Map



KZHK (Proposed)
BLH19970130KB
Latitude: 36-50-49 N
Longitude: 113-29-28 W
ERP: 100.00 kW
HAAT: 598.0 m
Channel: 240 C
Frequency: 95.9 MHz
AMSL Height: 1963.0 m
Elevation: 1896.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

V-Soft Communications LLC ©

Exhibit 5

Proposed Antenna Site Channel Spacings Study

KZHK(FM) 240C St. George, UT
Antenna Site Channel Spacings Study

REFERENCE
36 50 49.0 N.
113 29 28.0 W.

CLASS = C
Current spacings

DISPLAY DATES
DATA 07-25-09
SEARCH 07-30-09

----- Channel 240 - 95.9 MHz -----

Call	Channel	Location		Azi	Dist	FCC	Margin
KZHK	LIC 240C	St. George	UT	0.0	0.00	289.5	-289.50

Of Note:
Currently authorized facility for KZHK.

KZHK	CP 240C	Bunkerville	NV	247.5	61.01	289.5	-228.49
AL3165	RSV 240C	Bunkerville	NV	270.4	87.92	289.5	-201.58

Of Note:
Mutually Exclusive allotment and construction permit for KZHK(FM) to operate at Bunkerville, NV.

1323556	APP 239C	Salina	UT	30.5	199.06	240.5	-41.44
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Of Concern:
In the short form filing window for FM Auction #79, I-Four Media, LLC, requested preferred allotment coordinates at this site for the facility. The applicant has contacted I-Four regarding this preferred site and I-Four indicated that it was not "married" to the site and was willing to use the original allotment site for the auction station (see entry below). I-Four has, since, attempted to amend its preferred coordinates and was not successful due to limitations in the Auctions web System. I-Four has also indicated its willingness to accept an alternate substitute channel. However, due to Auction #79 rules and the freeze that is in effect, I-Four is unable to either amend its preferred coordinates or its channel until after the long-form filing window has closed although it is perfectly willing to do so.

KKLD	LIC-N 240C0	Cottonwood	AZ	152.3	270.00	280.5	-10.50
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Of Concern:
Section 73.215 Contour Protection requested towards KKLD(FM).

R10995	ADD 239C3	Seligman	AZ	158.7	181.19	175.5	5.69
AU7910924VAC	239C	Salina	UT	29.9	257.76	240.5	17.26

Of Note:
Original Allotment Site for the Salina, UT, station in Auction 79.

R10995	DEL 239C0	Cottonwood	AZ	152.3	269.94	219.5	50.44
R10995	ADD 240C1	Payson	AZ	145.7	322.93	269.5	53.43

Exhibit 5A

Section 73.215 Contour Overlap Map

KZHK(FM) 240C

vs:

KKLD(FM) 240C0

KZHK(FM) 240C St. George vs KKLD(FM) 240C0 Cottonwood
 Section 73.215 Contour Protection Study

FMCommander Single Allocation Study
 07-30-2009

KZHK CH 240 C
 100.0 kW 1963 M COR
 Prot. = 60 dBu
 Intef. = 40 dBu

KKLD CH 240 C0 BLH20061020ABZ
 100.0 kW, 2038.2 M COR
 Prot. = 60 dBu
 Intef. = 40 dBu

