

KUDD(FM)
Randolph, UT
Proposed Minor Modification
Of Licensed Facility

CONTINGENT Application Overview:

The following parties contemporaneously and contingently file 301 Applications:

- KQEO(FM) 300C1 (FCC Facility ID #87926) Idaho Falls, ID
- KAOX 296C1 (FCC Facility ID #31169) Shelley, ID
- KUDD(FM) 300C (FCC Facility ID #33438) Randolph, UT

In order for the proposed KQEO(FM) antenna site to be fully spaced under Section 73.207, it is contingent upon the grant of the contemporaneously and contingently proposed facilities for KAOX(FM) and KUDD(FM).

KUDD(FM) (FCC Facility ID# 33438) proposes to implement the Report and Order in MB Docket 05-243 and modify its currently Licensed Facilities using the following parameters:

Tech Box:

Channel:	300
Class:	C
Antenna Coordinates:	N40-52-16, W110-59-43 (NAD 27)
ASRN:	N/A
Tower Height AMSL:	58 m
COR AMSL:	3330 m

COR AMSL:	3330 m
COR AGL:	47 m
COR HAAT:	647 m
ERP:	Horizontally Polarized 89 kW
Directional Antenna:	Yes - see Exhibit 7

Antenna Site City-Grade Coverage (Alternate Propagation Method):

As can be seen in Exhibit 4, KUDD(FM)'s community of license, Randolph, UT, lies beyond the FCC predicted F(50,50) 70 dBu contour but completely within the FCC predicted F(50,50) 60 dBu contour on the 350 degree radial.¹ As shown in Exhibit 4, the F(50,50) 70 dBu community coverage contour is predicted to extend a radial distance of approximately 76 kilometers on the 350 degree radial toward Randolph, UT.

SPECIAL NOTE: It should be noted that station KDUT(FM) 272C Randolph, UT, is co-located with the proposed facilities of KUDD(FM) with an identical CORAMSL and “full field” ERP in the direction of Randolph, UT. The facilities of KDUT(FM) were previously found to meet the Commission’s Antenna Site City Grade Coverage requirements (BMPH-20020214AAM). Therefore, the Applicant believes that the Commission Staff can also depend on the previous examination of the KDUT(FM) showing to satisfy the Community Coverage requirement instantly proposed without additional study. Nonetheless, the Applicant has included an Alternate Propagation Showing herein.

¹ The predicted coverage contours for the proposed operation were calculated in accordance with the provisions of Section 73.313. Pursuant with current FCC practice, the distances to the contours were calculated without consideration given to terrain roughness correction factors. The average terrain elevations from 3 to 16 kilometers along eight radials evenly spaced at 45 degree intervals were obtained from the 30-second N.G.D.C. terrain database. The terrain elevations were then used in combination with the effective radiated power for determining the distances to coverage contours.

Even though the FCC predicted F(50,50) 70 dBu contour does not fully encompass Randolph, due to the drastic change in elevation between the transmitter site and Randolph, higher field strengths would be expected over the community than what FCC predicted contours would show. Therefore, the Longley-Rice alternate propagation model has been used to verify this expectation.

As can be seen on the map in Exhibit 4A, the first occurrence 73 dBu coverage contour, as predicted by Longley-Rice using the software code and input parameters as suggested by OET Bulletin 69, actually extends 99.8 kilometers on the 350 degree radial from the transmitter site, thereby easily covering the entire community of Randolph. The Community enjoys line of sight from the antenna site.

The topographic profile in Exhibit 4B further bolsters this assessment and shows that Longley-Rice actually predicts better than 87 dBu signal across the community of Randolph on the 350 degree azimuth.

Therefore, it is the undersigned's opinion that the instant application complies with Section 73.315 with respect to Community of License coverage.

Compliance with the Commission's current staff policies with respect to the application of the Longley-Rice alternate propagation model is met:

- The FCC predicted 60 dBu coverage contour entirely encompasses the community of license of Randolph (see Exhibit 4).
- The radial distance to the 70 dBu Longley-Rice propagation model contour exceeds the distance to the FCC F(50,50) 70 dBu contour by more than ten percent. In this case, the 73 dBu Longley-Rice propagation model Mean Occurrence contour exceeds the distance to the FCC F(50,50) 70 dBu contour by more than 31.0% on the 350 degree radial (see Exhibit 4A).
- The “delta-h” requirement is achieved along 350 degree radial as calculations indicate a delta-h value of 179 meters at 350 degrees when considering the elevations extending from 10 kilometers to 50 kilometers from the proposed transmitter site. This complies with the current Commission policy requiring a “delta-h” of less than 20 meters or greater than 100 meters in order to utilize an alternate propagation method to determine coverage such as Longley-Rice or FM Point to Point.

Interference Study (Requesting Section 73.215 Contour Protection):

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

-KBKL(LIC & CP) Grand Junction, CO 300C (see BLH-19980304KI & BPH-20070723AEK)

Therefore, the applicant requests Section 73.215 contour protection processing.

KUDD(FM) is eligible to request 73.215 Contour Protection towards KBKL(LIC & CP) 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 KUDD(FM) 300C antenna location is spaced 277.59 kilometers from the KBKL(LIC & CP) site. In order to be eligible for 73.215 Contour Protection, the minimum “C to C” spacing for Co channel stations must be at least 270 kilometers. The proposed KUDD(FM) 300C antenna site satisfies this requirement by 7.59 kilometers.

Using the facilities proposed herein, KUDD(FM) 300C complies with the contour protection requirements of Section 73.215 towards KBKL(LIC & CP). The attached overlap tabulation studies and overlap 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 KBKL(LIC & CP) does not utilize maximum Class C facilities, the following overlap studies were conducted assuming “Maximized” Class C Facilities for KBKL(LIC & CP) (100 kW at an HAAT of 600 meters).

Using the KUDD(FM) 300C technical parameters proposed in this application, Exhibit 5A demonstrates that the proposed KUDD(FM) F(50,50) 60 dBu Protected Contour does not overlap the F(50,10) 40 dBu Interfering Contour of KBKL(LIC & CP) operations on Channel 300C. Likewise, Exhibit 5A demonstrates that the F(50,50) 60 dBu Protected Contour for

KBKL(LIC & CP) does not overlap the proposed F(50,10) 40 dBu Interfering Contour of the instant KUDD(FM) application on 300C. Therefore, it appears as though the instant application meets the requirements of Section 73.215 towards KBKL(LIC & CP).

Downward Radiation Study (Measure Upon Construction)

Due to the fact that several existing and proposed emitters are located at or near the site, the applicant agrees to conduct a Radiofrequency Electromagnetic Field survey at the site upon construction of the proposed facility to ensure that any areas at ground level that exceed the Commission's exposure guideline values are appropriately marked and fenced. The results of the survey will be provided with the application for license.

Even though the site will fully comply with the Uncontrolled Site Standards, access to the transmitting site will be 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:

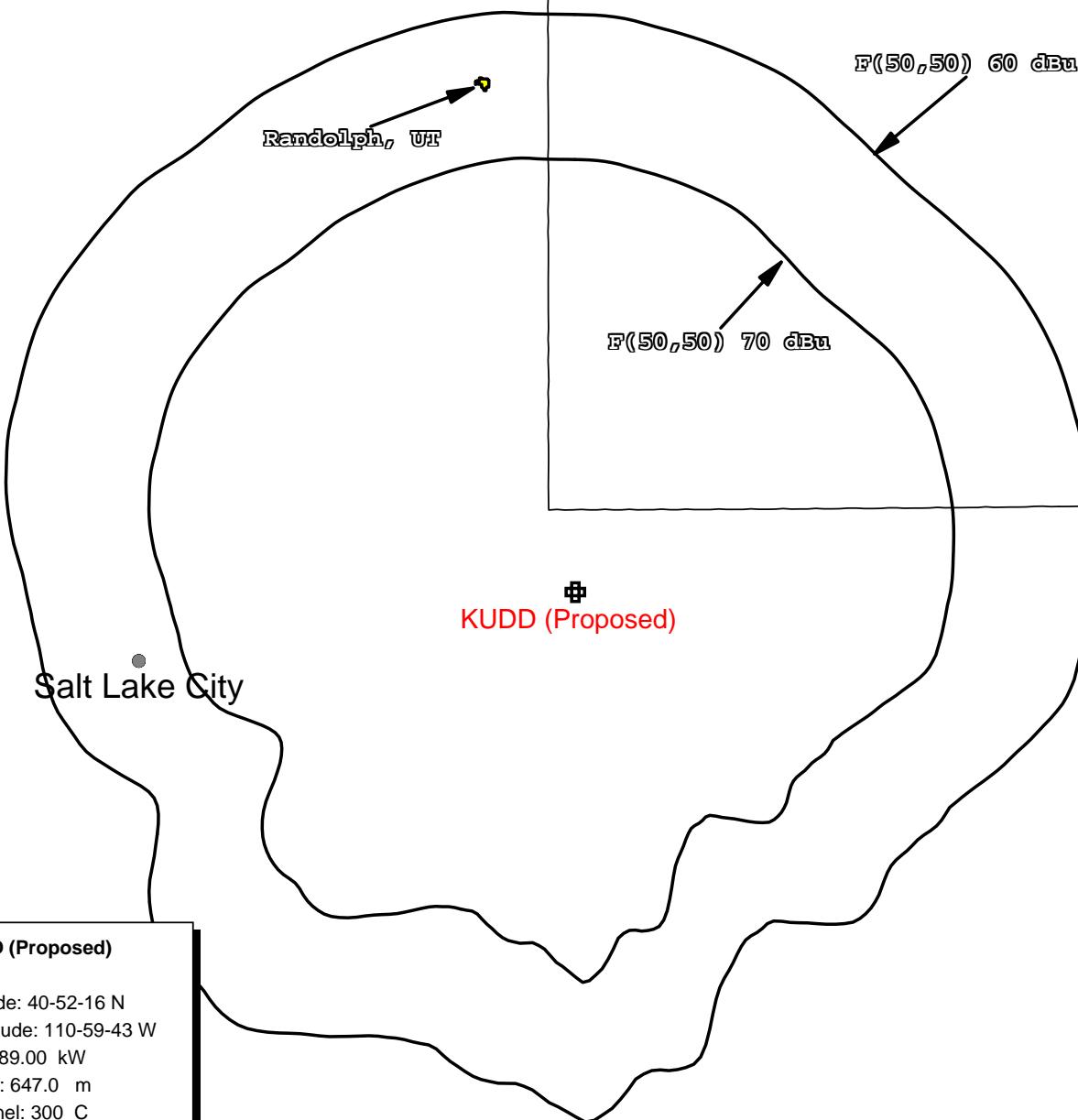
The proposed facility is exempt from environmental processing because the facility is not located at a location specified in Section 1.1307(a)(1)-(8) of the Commission's Rules and since the tower in question already exists.

Exhibit 4

Proposed Antenna Site Contour Map:

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

KUDD(FM) 300C Randolph, UT
Community Coverage Contour Map



KUDD (Proposed)

Latitude: 40-52-16 N
Longitude: 110-59-43 W
ERP: 89.00 kW
HAAT: 647.0 m
Channel: 300 C
Frequency: 107.9 MHz
AMSL Height: 3330.0 m
Elevation: 3283.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0150
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

Scale 1:1,198,906
0 10 20 30 km

Exhibit 4A

Alternate Propagation Method Coverage Map

**Longley-Rice Method
Mean Occurrence
73 dBu Contour**

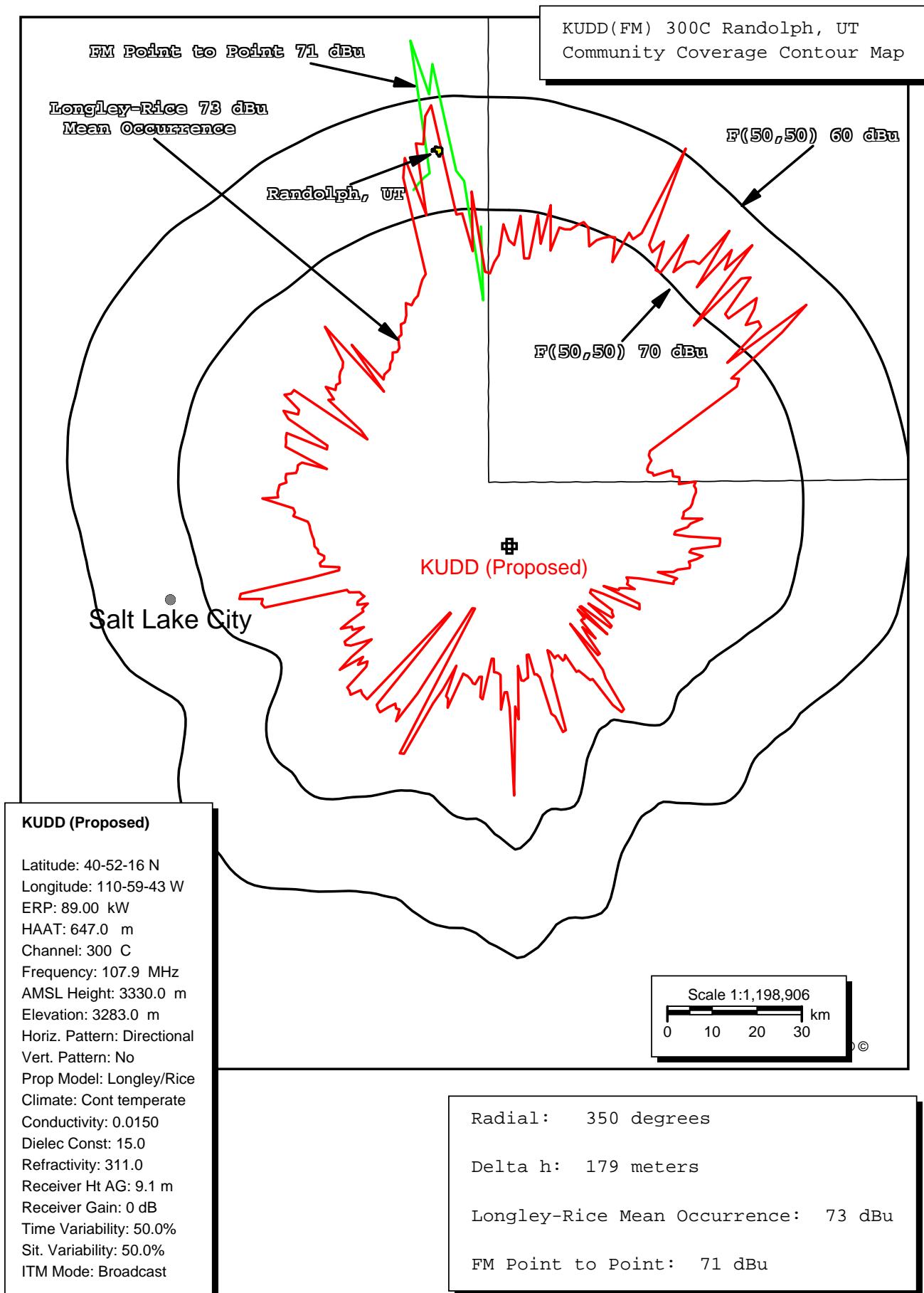
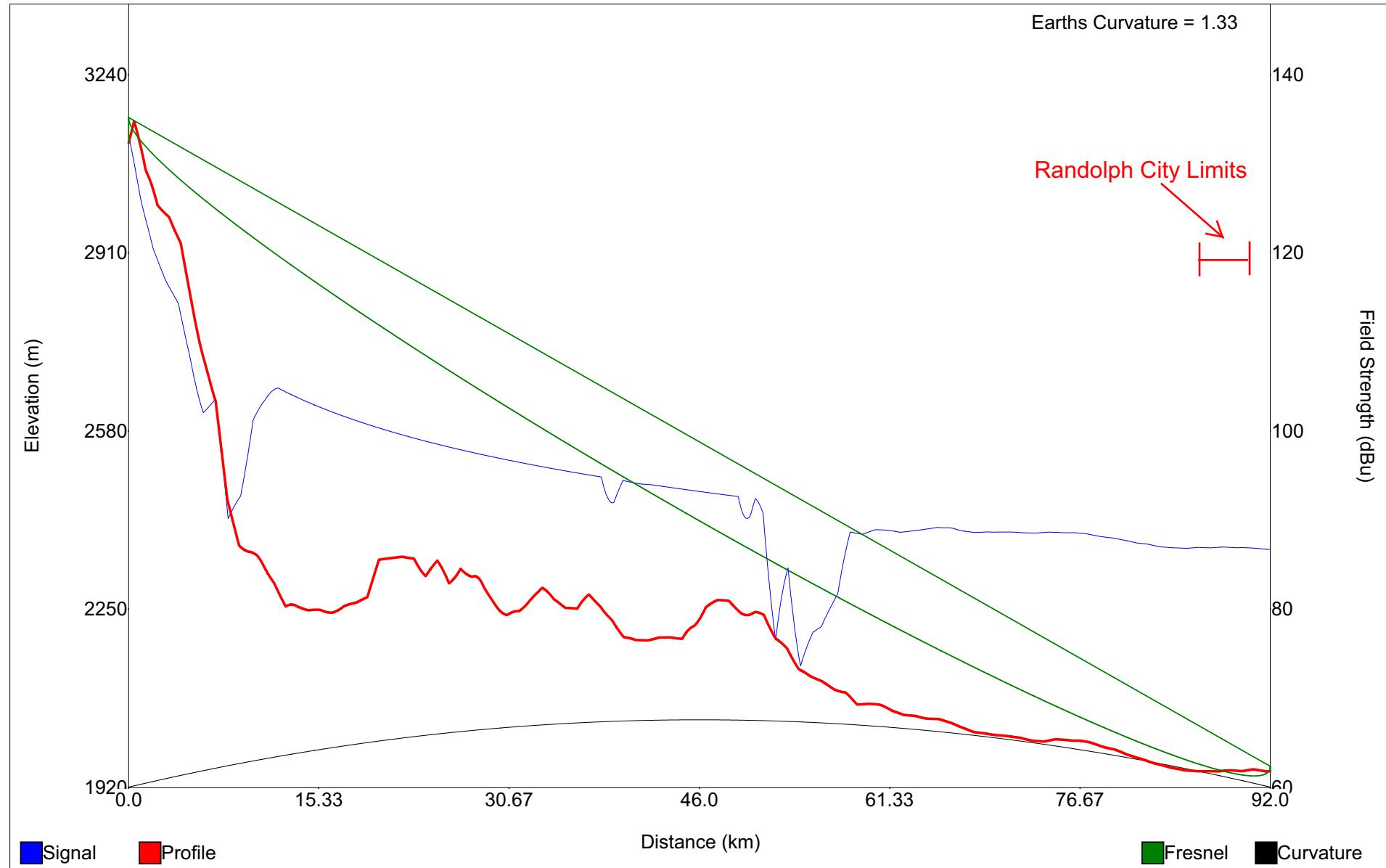


Exhibit 4B

**Alternate Propagation Method
Profile Map
to
Randolph, UT**

KUDD(FM) Profile to Randolph, UT



Starting Latitude: 40-52-16 N

Starting Longitude: 110-59-43 W

End Latitude: 41-41-12.38 N

End Longitude: 111-11-13.75 W

Distance: 92 km

Bearing: 350 deg

Transmitter Height (AG) = 47.0 m

Receiver Height (AG) = 9.1 m

Transmitter Elevation = 3113.6 m

Receiver Elevation = 1949.1 m

Frequency = 107.9 MHz

Fresnel Zone: 0.6

Exhibit 5

Proposed Antenna Site Channel Spacings Study

KUDD(FM) 300C Randol ph, UT Section 73.207 Antenna Site Spacings Study

SECTION 78.267 ANTENNA SITE SPACINGS STUDY
REFERENCE 40 52 16.0 N. CLASS = C DISPLAY DATES
110 59 43.0 W. Current Spacings DATA 02-26-08
----- Channel 300 - 107.9 MHz SEARCH 02-29-08

Call I	Channel	Location	Azi	Dist	FCC	Margin		
RADD Of Note:	ADD Addition of Channel	300C 300C at Randolph	UT for KUDD(FM)'s use in MB	340.7	24.59	289.5	-264.91	
RDEL KUDD Of Note:	DEL LIC	300C 300C	Roy Roy	UT UT	264.9 290.0	75.83 128.79	289.5 289.5	-213.67 -160.71
KBKL Of Concern:	LIC CP	300C 300C	Grand Junction Grand Junction	CO CO	135.6 135.6	277.59 277.59	289.5 289.5	-11.91 -11.91
RDEL KKAT-FM Of Note:	DEL LIC	298C 298C	Orem Orem	UT UT	230.7 230.7	103.13 103.13	104.5 104.5	-1.37 -1.37
KKAT-FM Of Note:	APP	298C	Kaysville	UT	257.4	104.51	104.5	0.01
RADD Of Note:	ADD	298C	Kaysville	UT	257.3	104.51	104.5	0.01
RDEL KAOX RDEL KZHT	DEL LIC	297C2 297C2	Kemmerer Kemmerer	ID WY	20.7 20.7	115.04 115.04	104.5 104.5	10.54 10.54
RDEL LIC	DEL	297C2	Kemmerer	WY	20.7	115.04	104.5	10.54
RDEL LIC	246C	Sal t Lake Ci ty	UT	257.3	104.51	47.5	57.01	

Exhibit 5A

Section 73.215 Contour Overlap Tabulations and Contour Overlap Map

**KUDD(FM) 300C
vs:
KBKL(LIC & CP) 300C**

330. 0	100. 0000	0802. 5	099. 7	128. 5	066. 5517	0354. 6	181. 5	37. 7
331. 0	100. 0000	0813. 1	100. 1	128. 0	064. 9988	0362. 1	181. 8	37. 7
332. 0	100. 0000	0822. 6	100. 4	127. 4	063. 4818	0368. 4	182. 1	37. 6
333. 0	100. 0000	0831. 8	100. 8	126. 9	061. 9955	0368. 4	182. 5	37. 5
334. 0	100. 0000	0841. 2	101. 1	126. 3	060. 5341	0374. 8	183. 0	37. 4
335. 0	100. 0000	0851. 5	101. 5	125. 8	059. 0903	0374. 8	183. 5	37. 2
336. 0	100. 0000	0862. 8	101. 9	125. 2	057. 6624	0384. 3	184. 0	37. 2
337. 0	100. 0000	0874. 4	102. 3	124. 7	056. 2646	0384. 3	184. 5	36. 9
338. 0	100. 0000	0884. 4	102. 6	124. 2	054. 9245	0395. 6	185. 2	36. 9
339. 0	100. 0000	0891. 0	102. 9	123. 7	053. 6655	0395. 6	186. 0	36. 6
340. 0	100. 0000	0894. 2	103. 0	123. 2	052. 4919	0405. 8	187. 0	36. 5
341. 0	100. 0000	0894. 4	103. 0	122. 8	051. 3959	0405. 8	188. 1	36. 3
342. 0	100. 0000	0893. 0	102. 9	122. 3	050. 3589	0412. 9	189. 2	36. 1
343. 0	100. 0000	0891. 3	102. 9	121. 9	049. 3661	0412. 9	190. 4	35. 8
344. 0	100. 0000	0890. 4	102. 8	121. 5	048. 3989	0412. 9	191. 6	35. 5
345. 0	100. 0000	0890. 5	102. 8	121. 1	047. 4512	0418. 0	192. 8	35. 3
346. 0	100. 0000	0890. 8	102. 9	120. 7	046. 5362	0418. 0	194. 0	34. 9
347. 0	100. 0000	0890. 2	102. 8	120. 4	045. 6717	0422. 8	195. 3	34. 7
348. 0	100. 0000	0888. 9	102. 8	120. 0	044. 8723	0422. 8	196. 7	34. 4
349. 0	100. 0000	0887. 9	102. 8	119. 6	045. 2683	0422. 8	198. 0	34. 1
350. 0	100. 0000	0887. 8	102. 8	119. 3	045. 6599	0427. 3	199. 4	34. 0
351. 0	100. 0000	0888. 9	102. 8	119. 0	046. 0499	0427. 3	200. 7	33. 8
352. 0	100. 0000	0891. 1	102. 9	118. 6	046. 4385	0427. 3	202. 1	33. 6
353. 0	100. 0000	0894. 7	103. 0	118. 3	046. 8261	0431. 9	203. 5	33. 4
354. 0	100. 0000	0898. 5	103. 1	118. 0	047. 2049	0431. 9	204. 9	33. 2
355. 0	100. 0000	0901. 9	103. 2	117. 7	047. 5679	0431. 9	206. 3	32. 9
356. 0	100. 0000	0904. 8	103. 3	117. 4	047. 9157	0437. 4	207. 8	32. 8
357. 0	100. 0000	0908. 2	103. 4	117. 1	048. 2547	0437. 4	209. 3	32. 5
358. 0	100. 0000	0912. 4	103. 5	116. 8	048. 5882	0437. 4	210. 8	32. 3
359. 0	100. 0000	0915. 4	103. 6	116. 5	048. 9005	0437. 4	212. 3	32. 0

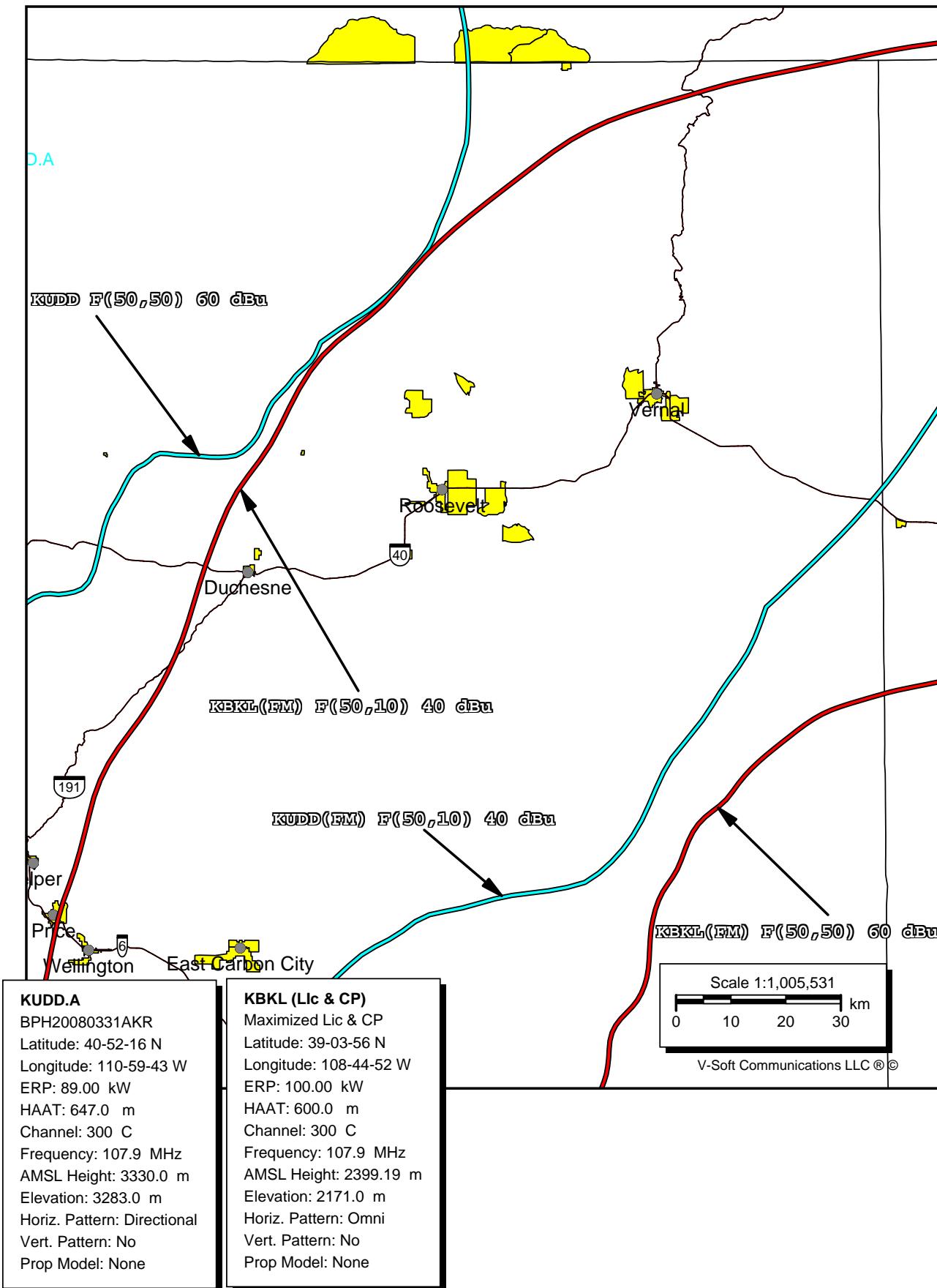


Exhibit 7

Proposed Directional Pattern Azimuth Tabulations

KUDD Envelope

Pre-Rotation Antenna Pattern....

Azimuth (deg)	Effective Field
0.0	1.000
10.0	1.000
20.0	1.000
30.0	1.000
40.0	1.000
50.0	1.000
60.0	1.000
70.0	1.000
80.0	1.000
90.0	1.000
100.0	0.870
110.0	0.800
120.0	0.710
130.0	0.891
140.0	1.000
150.0	1.000
160.0	1.000
170.0	1.000
180.0	1.000
190.0	1.000
200.0	1.000
210.0	1.000
220.0	1.000
230.0	1.000
240.0	1.000
250.0	1.000
260.0	1.000
270.0	1.000
280.0	1.000
290.0	1.000
300.0	1.000
310.0	1.000
320.0	1.000
330.0	1.000
340.0	1.000
350.0	1.000

Rotation Angle = 0

