

**March 2015**  
**FM Translator K258CN**  
**Richland, Washington Channel 258D**  
**Allocation Study**

The attached spacing study shows the spacing between the proposed translator site and the location of cochannel and adjacent channel stations and proposals. This study was made with the Commission's Class A spacing requirements, and individual situations were examined to determine the lack of prohibited contour overlap per the requirements of §74.1204 of the Rules. The attached allocation study map demonstrates compliance with the Commission's Rules for protection of FM broadcast stations and FM translators as outlined in §74.1204.

The proposed translator transmitter site is located within the 60 dBu protected contour of second-adjacent channel station KUJ-FM 256C1 Burbank. The proposed site is just 0.55 km from the KUJ-FM transmitter site. Given the KUJ-FM antenna's minimum azimuthal ERP of 3.8 kW, KUJ-FM places a minimum 117.9 dBu contour at the translator transmitter site. The corresponding interfering contour from the translator is  $117.9 + 40 = 157.9$  dBu. The 157.9 dBu contour would extend just 0.9 meters from the transmitting antenna per a Free Space calculation, and would not reach ground level. There is no population within this contour. Therefore, the proposed facility is believed to satisfy the requirements of §74.1204(d) with respect to KUJ-FM.

Since the proposed facility will operate with an ERP of less than 100 watts, there are no spacing restrictions to stations which are 53 or 54 channels removed from the proposed operation.

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## SEARCH PARAMETERS

FM Database Date: 150227

Channel: 258A 99.5 MHz  
 Latitude: 46 6 15  
 Longitude: 119 7 48  
 Safety Zone: 50 km  
 Job Title: K258CN RICHLAND

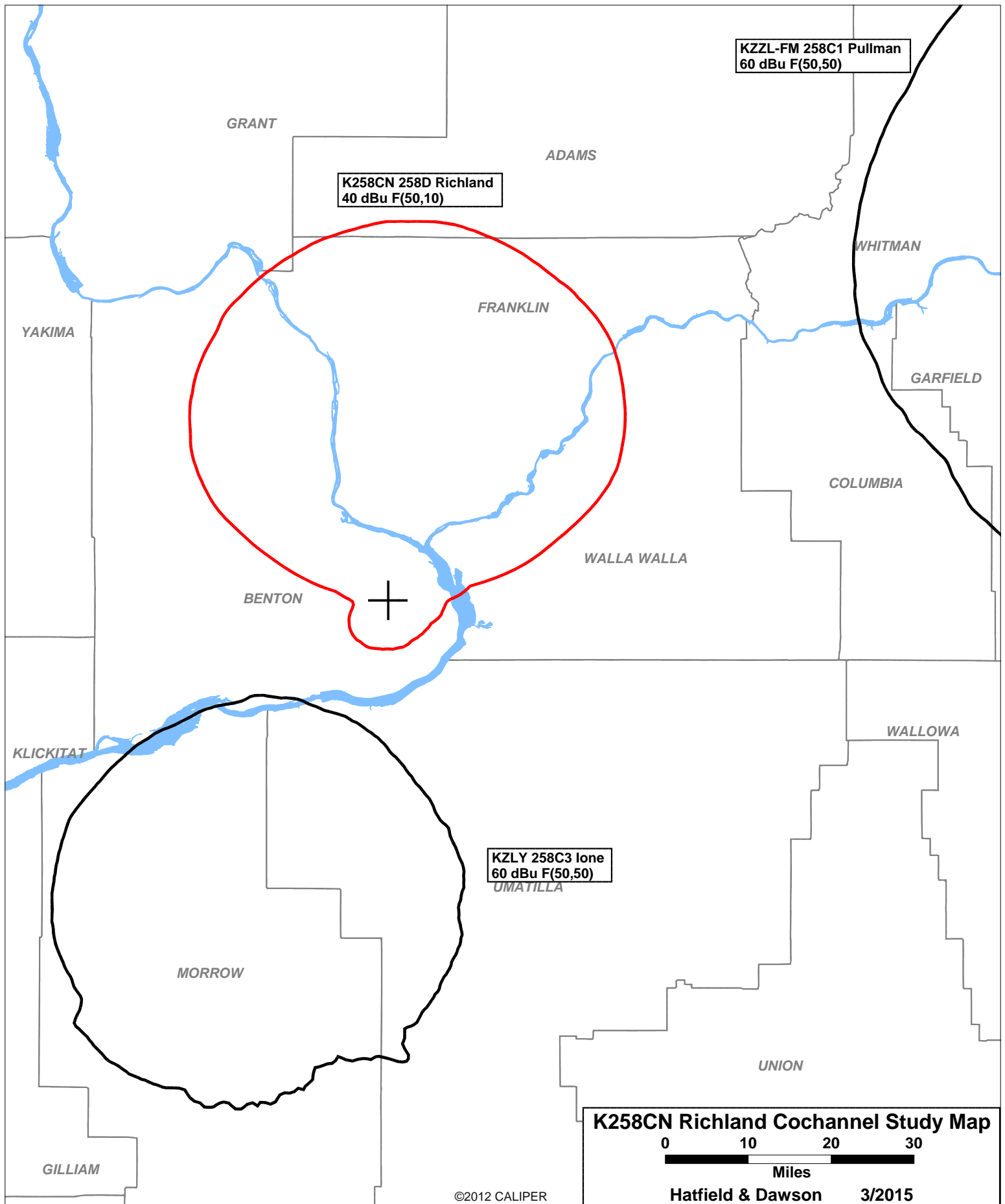
Page 1

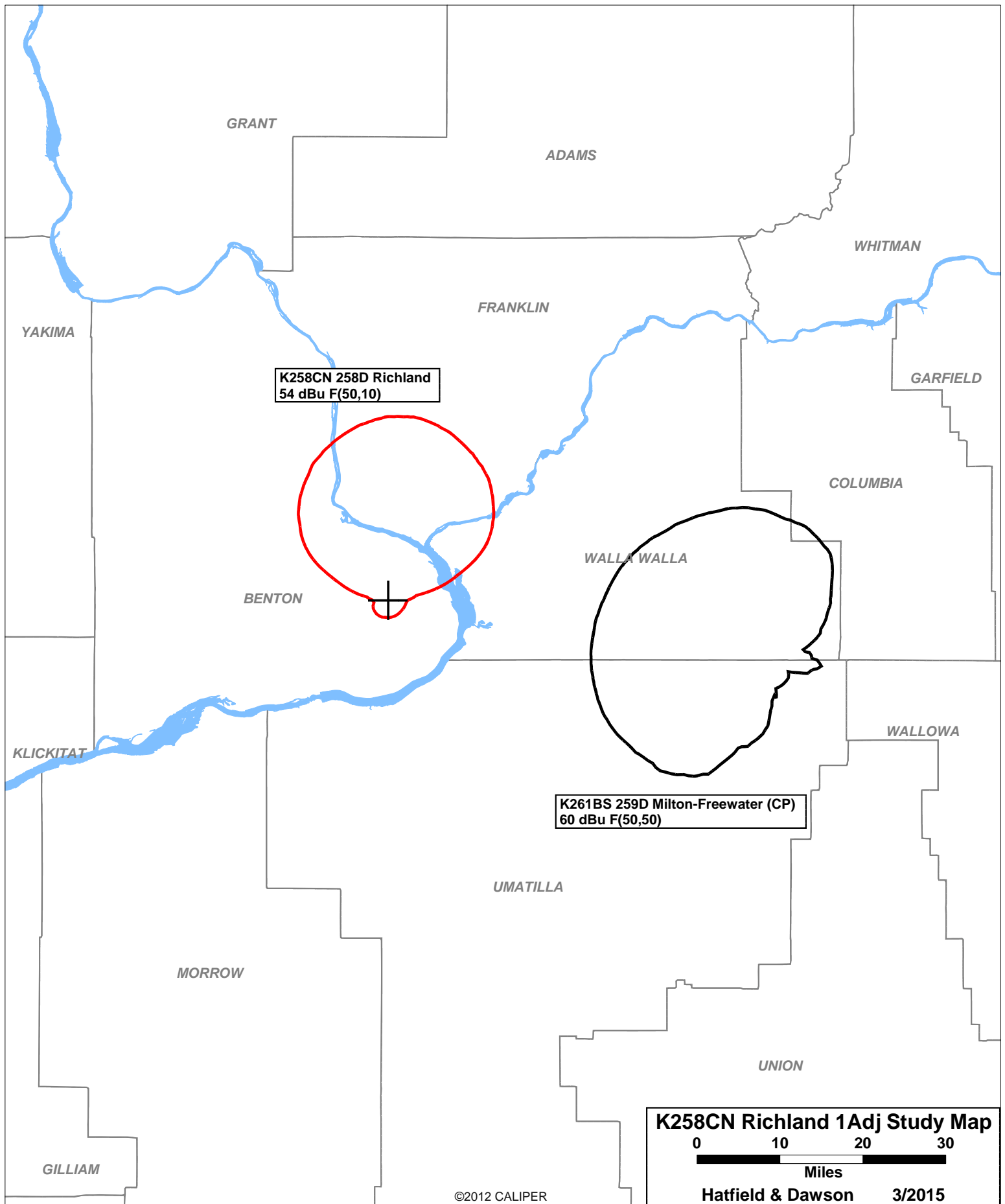
Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K204CZ LIC	KENNEWICK WA	BLFT-90430ABI	204D 88.7	0.010 544.0	46-06-15 119-07-36	83.1	0.26 0.00	0 TRANS
KUJ-FM LIC	BURBANK WA	BLH-60905AAY	256C1 99.1	52.000 385.0	46-05-58 119-07-40	161.9 SS	0.55 -74.45	75 SHORT
KUJ-aux CP	BURBANK WA	BXPB-30122ADS	256C1 99.1	5.000 -15.0	46-13-18 119-11-10	341.7	13.76 0.00	0 AUX
KDRM LIC	MOSES LAKE WA	BLH-801112AJ	257A 99.3	3.000 61.0	47-05-54 119-17-47	353.5	111.25 39.25	72 CLEAR
KZLY LIC	IONE OR	BLH-31126BMX	258C3 99.5	1.800 370.0	45-29-12 119-25-52	198.9 SS	72.52 -69.48	142 SHORT
K258BM LIC	LA GRANDE OR	BLFT-10525ABW	258D 99.5	0.099 129.0	45-20-53 118-07-02	136.6	115.23 0.00	0 TRANS
RSV	PULLMAN WA	RM-coord-22	258C 99.5	0.000 0.0	46-40-49 116-53-18	68.8	183.93 -42.07	226 SHORT
KZZL-FM LIC	PULLMAN WA	BMLH-20920AAD	258C1 99.5	81.000 323.0	46-40-52 116-58-16	68.0	178.01 -21.99	200 SHORT
K258CN CP	RICHLAND WA	BNPFT-30823ABG	258D 99.5	0.099 538.0	46-06-15 119-07-48	0.0	0.00 0.00	0 TRANS
K261BS CP	MILTON-FREEWATER OR	BPFT-41110ADI	259D 99.7	0.170 813.0	45-59-23 118-10-31	99.5	74.98 0.00	0 TRANS
KHHK LIC	YAKIMA WA	BMLH-40204ABJ	259C3 99.7	4.100 245.0	46-31-20 120-20-08	297.1	103.84 14.84	89 CLEAR
KHHKaux LIC	YAKIMA WA	BXLH-40718ABA	259C3 99.7	1.000 -59.0	46-36-09 120-30-13	298.2	119.36 0.00	0 AUX
RSV	HERMISTON OR	RM-11242	261A 100.1	0.000 0.0	45-51-57 119-18-38	207.8	29.96 -1.04	31 SHORT

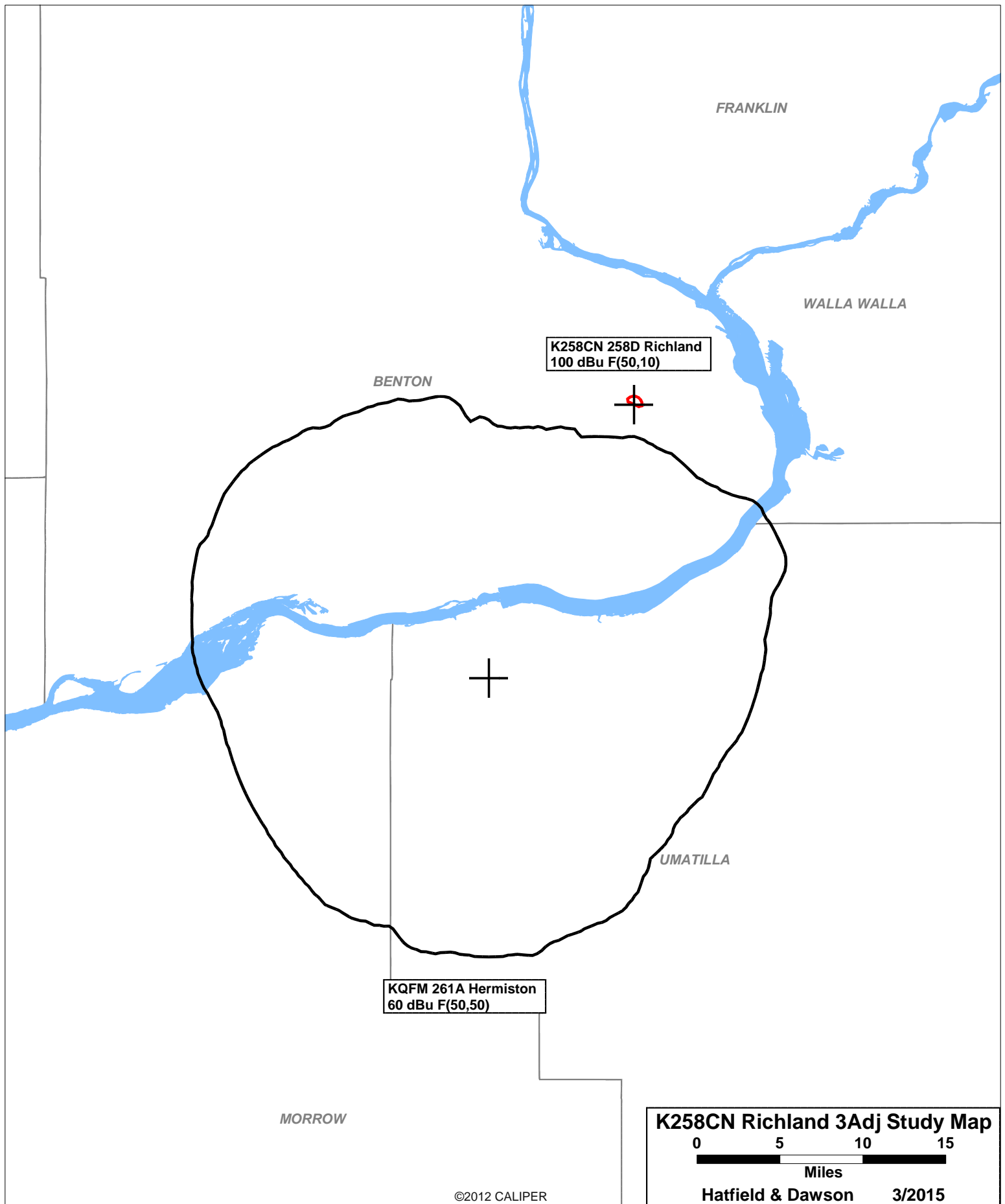
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SEARCH PARAMETERS                               FM Database Date: 150227
Channel: 258A      99.5 MHz                      Page 2
Latitude: 46 6 15
Longitude: 119 7 48
Safety Zone: 50 km
Job Title: K258CN RICHLAND
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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
	HERMISTON		261A	0.000	45-51-57	208.0	30.00	31
	OR RM-inv-54		100.1	0.0	119-18-42		-1.00	SHORT
KQFM	HERMISTON		261A	5.300	45-51-57	208.0	30.00	31
LIC	OR BLH-00211ABO		100.1	94.0	119-18-42		-1.00	SHORT
K261BS	MILTON-FREEWATER		261D	0.190	46-02-33	96.1	62.01	0
LIC	OR BLFT-21004ABK		100.1	146.0	118-20-00		0.00	TRANS
KRKG-FM	PASCO		261A	0.450	46-06-15	0.0	0.00	31
APP	WA BMPH-41119ACU		100.1	361.0	119-07-48		-31.00	SHORT
NOTE: PARENT STATION FOR K258CN								
KRKG-FM	PASCO		261A	0.880	46-14-04	314.7	20.63	31
CP	WA BPH-30529AIA		100.1	262.0	119-19-13		-10.37	SHORT
NOTE: PARENT STATION FOR K258CN								

===== END OF FM SPACING STUDY FOR CHANNEL 258 =====







**March 2015**  
**FM Translator K258CN**  
**Richland, Washington Channel 258D**  
**RF Exposure Study**

**Facilities Proposed**

The proposed operation will be on Channel 258D (99.5 MHz) with a maximum lobe effective radiated power of 99 watts. Operation is proposed with an antenna to be mounted on an existing tower on Jump Off Joe Butte.

The proposed antenna support structure will not exceed 60.96 meters (200 feet) above ground and does not require notification to the Federal Aviation Administration. Therefore, this structure does not require an Antenna Structure Registration Number.

**RF Exposure Calculations**

The power density calculations shown below were made using the techniques outlined in OET Bulletin No. 65. "Ground level" calculations in this report have been made at a reference height of 2 meters above ground to provide a worst-case estimate of exposure for persons standing on the ground in the vicinity of the tower. The equation shown below was used to calculate the ground level power density figures from each antenna.

$$S(\mu W / cm^2) = \frac{33.40981 \times AdjERP(Watts)}{D^2}$$

Where: *AdjERP(Watts)* is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

*D* is the distance in meters from the center of radiation to the calculation point.

Ground level power densities have been calculated for locations extending from the base of the tower to a distance of 1000 meters. Values past this point are increasingly negligible.

Calculations of the power density produced by the proposed translator antenna system have been made using the "worst case" element pattern for a vertical dipole antenna. Under this worst-case assumption, the highest calculated ground level power density from the translator occurs at a distance of 2 meters from the base of the antenna support structure. At this point the power density is calculated to be 49.2  $\mu W/cm^2$ .

**However, the antenna to be used by the translator is not a vertical dipole, and use of the dipole element model dramatically overstates the ground-level power densities produced by this antenna.** Included with this Engineering Statement is a complete tabulation of the Scala CL-FMV vertical plane radiation pattern as provided by Scala (the antenna manufacturer) along with the calculated ground-level power density from the antenna at 1 meter increments from the antenna. A sample calculation is provided to demonstrate that these calculations were performed correctly using appropriate mathematical principles and the formula from OET Bulletin No. 65. The

highest calculated ground level power density from the translator occurs at a distance of 13 meters from the base of the antenna support structure. At this point the power density is calculated to be  $5.4 \mu\text{W}/\text{cm}^2$ , which is less than 5% of  $200 \mu\text{W}/\text{cm}^2$  (the FCC standard for uncontrolled environments).

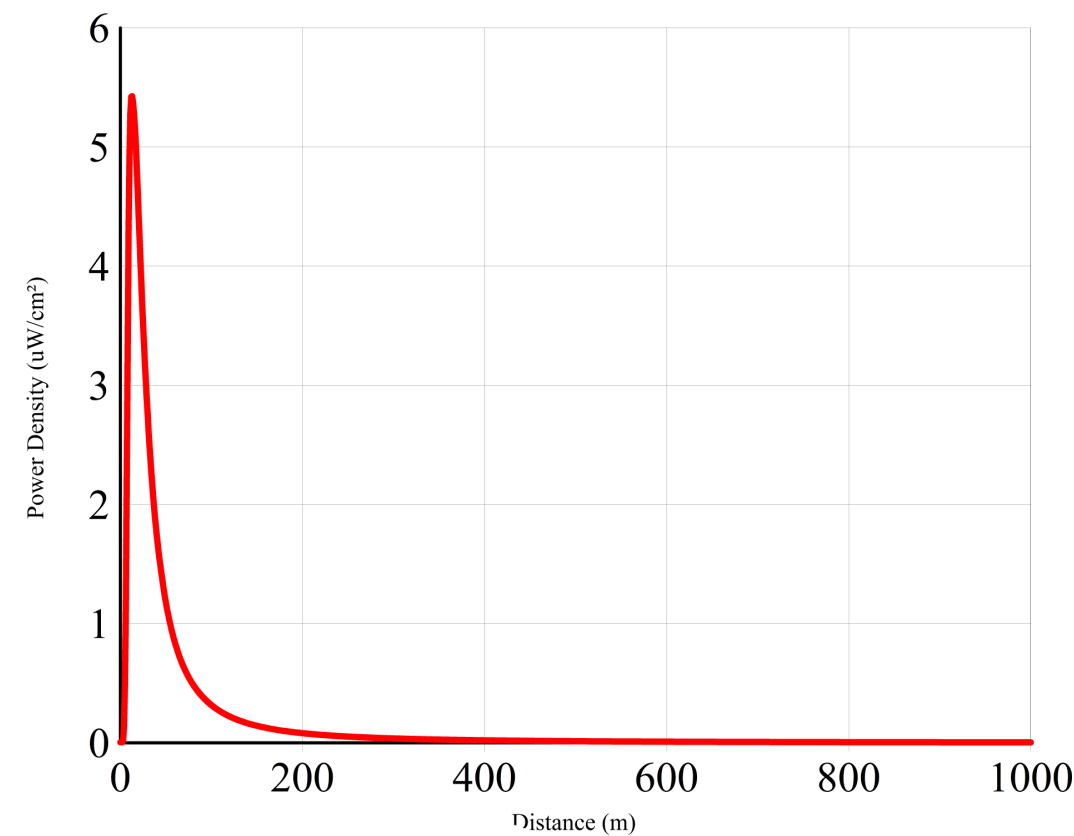
It is understood that the applicant must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency exposure in excess of FCC guidelines.



K258CN Richland  
Ground-Level Power Density Calculations  
Using Manufacturer's Vertical Plane Pattern

Antenna	CLFMV	
ERP	0 Watts H (avg)	
	99 Watts V (avg)	
Antenna AGL	10 meters less 2m is	8 meters above the reference plane
Calculated		
Maximum is	5.4 uW/cm² at	13 meters from the tower

Power Density vs Distance



Distance From Tower (meters)	Hypotenuse (meters)	Depression Angle (degrees)	Interp Rel Field	Adjusted ERP (watts)	Power Density uW/cm <sup>2</sup>
0	8.00	90.00	0.010	0.0	0.01
1	8.06	82.87	0.010	0.0	0.01
2	8.25	75.96	0.010	0.0	0.00
3	8.54	69.44	0.023	0.1	0.02
4	8.94	63.43	0.058	0.3	0.14
5	9.43	57.99	0.113	1.3	0.48
6	10.00	53.13	0.191	3.6	1.20
7	10.63	48.81	0.276	7.5	2.23
8	11.31	45.00	0.360	12.8	3.35
9	12.04	41.63	0.434	18.7	4.30
10	12.81	38.66	0.494	24.2	4.93
11	13.60	36.03	0.543	29.2	5.28
12	14.42	33.69	0.584	33.8	5.42
13	15.26	31.61	0.618	37.8	5.43
14	16.12	29.74	0.650	41.8	5.37
15	17.00	28.07	0.680	45.7	5.29
16	17.89	26.57	0.707	49.5	5.16
17	18.79	25.20	0.731	53.0	5.01
18	19.70	23.96	0.753	56.1	4.83
19	20.62	22.83	0.772	59.0	4.64
20	21.54	21.80	0.789	61.7	4.44
21	22.47	20.85	0.805	64.2	4.25
22	23.41	19.98	0.820	66.6	4.06
23	24.35	19.18	0.832	68.6	3.86
24	25.30	18.43	0.843	70.4	3.68
25	26.25	17.74	0.854	72.2	3.50
26	27.20	17.10	0.863	73.8	3.33
27	28.16	16.50	0.872	75.4	3.17
28	29.12	15.95	0.881	76.8	3.03
29	30.08	15.42	0.889	78.2	2.89
30	31.05	14.93	0.896	79.4	2.75
31	32.02	14.47	0.901	80.3	2.62
32	32.98	14.04	0.906	81.2	2.49
33	33.96	13.63	0.910	82.0	2.38
34	34.93	13.24	0.914	82.8	2.27
35	35.90	12.88	0.918	83.5	2.16
36	36.88	12.53	0.922	84.2	2.07
37	37.85	12.20	0.926	84.9	1.98
38	38.83	11.89	0.929	85.5	1.89
39	39.81	11.59	0.932	86.1	1.81
40	40.79	11.31	0.936	86.7	1.74

### Sample Calculation for Single Scala CL-FMV antenna

At 13 meters from the base of the antenna support structure, the slant distance to a point 2 meters above ground level is 15.26 meters. This is determined by simple trigonometry, determining the length of the hypotenuse for a right triangle which is 13 meters along the base and 8 meters in height (8 meters being 2 meters less than the antenna height above ground level):

$$a^2 + b^2 = c^2$$

$$13^2 + 8^2 = c^2$$

$$c = 15.26 \text{ meters} = \text{hypotenuse}$$

The corresponding depression angle is identical to the angle between the base and hypotenuse, and is determined here as the inverse of the sine of the height over the hypotenuse of the right triangle:

$$\sin(\text{angle}) = \text{opposite} / \text{hypotenuse}$$

$$\sin(\text{angle}) = 8 / 15.26$$

$$\sin(\text{angle}) = 0.530$$

$$\text{angle} = 31.61 \text{ degrees}$$

From the vertical plane pattern tabulation for the Scala CL-FMV antenna, the relative field value at a depression angle of 31 degrees is 0.628, and at a depression angle of 32 degrees is 0.612. Interpolating between these two, we arrive at a relative field value of 0.618 at a depression angle of 31.61 degrees. We use this relative field value to arrive at the adjusted ERP in watts at the depression angle:

$$\text{adjusted ERP} = (\text{watts H} + \text{watts V}) (\text{relative field squared})$$

$$\text{adjusted ERP} = (0 + 99) (0.618^2)$$

$$\text{adjusted ERP} = 37.8 \text{ watts}$$

By plugging this value into the formula from OET Bulletin 65, we arrive at the calculated ground-level power density:

$$S(\mu W / cm^2) = \frac{33.40981 \times \text{AdjERP(Watts)}}{D^2}$$

Where: *AdjERP(Watts)* is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

*D* is the distance in meters from the center of radiation to the calculation point.

Thus, for an adjusted ERP of 37.8 watts and a slant distance of 15.26 meters, *S* is calculated to equal 5.4  $\mu W/cm^2$ .

**Vertical Plane Radiation Pattern for Scala CL-FMV Antenna**  
**Downloaded from Kathrein Scala Pattern & Download Library**

		52	0.212
Dep	Relative Field	53	0.193
Angle		54	0.174
		55	0.155
0	1	56	0.141
1	0.996	57	0.127
2	0.992	58	0.113
3	0.988	59	0.099
4	0.984	60	0.085
5	0.98	61	0.077
6	0.974	62	0.069
7	0.968	63	0.061
8	0.962	64	0.053
9	0.956	65	0.045
10	0.95	66	0.04
11	0.939	67	0.035
12	0.928	68	0.03
13	0.917	69	0.025
14	0.906	70	0.02
15	0.895	71	0.018
16	0.88	72	0.016
17	0.865	73	0.014
18	0.85	74	0.012
19	0.835	75	0.01
20	0.82	76	0.01
21	0.803	77	0.01
22	0.786	78	0.01
23	0.769	79	0.01
24	0.752	80	0.01
25	0.735	81	0.01
26	0.717	82	0.01
27	0.699	83	0.01
28	0.681	84	0.01
29	0.663	85	0.01
30	0.645	86	0.01
31	0.628	87	0.01
32	0.612	88	0.01
33	0.595	89	0.01
34	0.579	90	0.01
35	0.563		
36	0.544		
37	0.525		
38	0.507		
39	0.488		
40	0.47		
41	0.448		
42	0.426		
43	0.404		
44	0.382		
45	0.36		
46	0.338		
47	0.316		
48	0.294		
49	0.272		
50	0.25		
51	0.231		