

## Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

---

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

In either or both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules. In this case, KBCO has a signal of 92.2 dBu at the proposed FMT site. (KXPK has a signal strength of 97.2 dBu at the proposed FMT site). Therefore, the 132.2 dBu contour is the effective interference contour that must be demonstrated uninhabited and unpopulated. As shown on the map below, the proposed FMT site is plotted on a 7.5 minute USGS map, as is the proposed 132.2 dBu interference contour (it extends less than 10 meters from the proposed site).

The applicant has personally visited the site, and can attest that the closest building to the proposed FMT site is a storage building, and not a habitable dwelling. A photograph of that building is herein attached.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Exhibit Demonstrating 132.2 dBu Interference Contour  
free of population, structures or dwellings --thus uninhabited

Proposed 132.2 dBu Interference Contour  
Proposed FM Translator Site

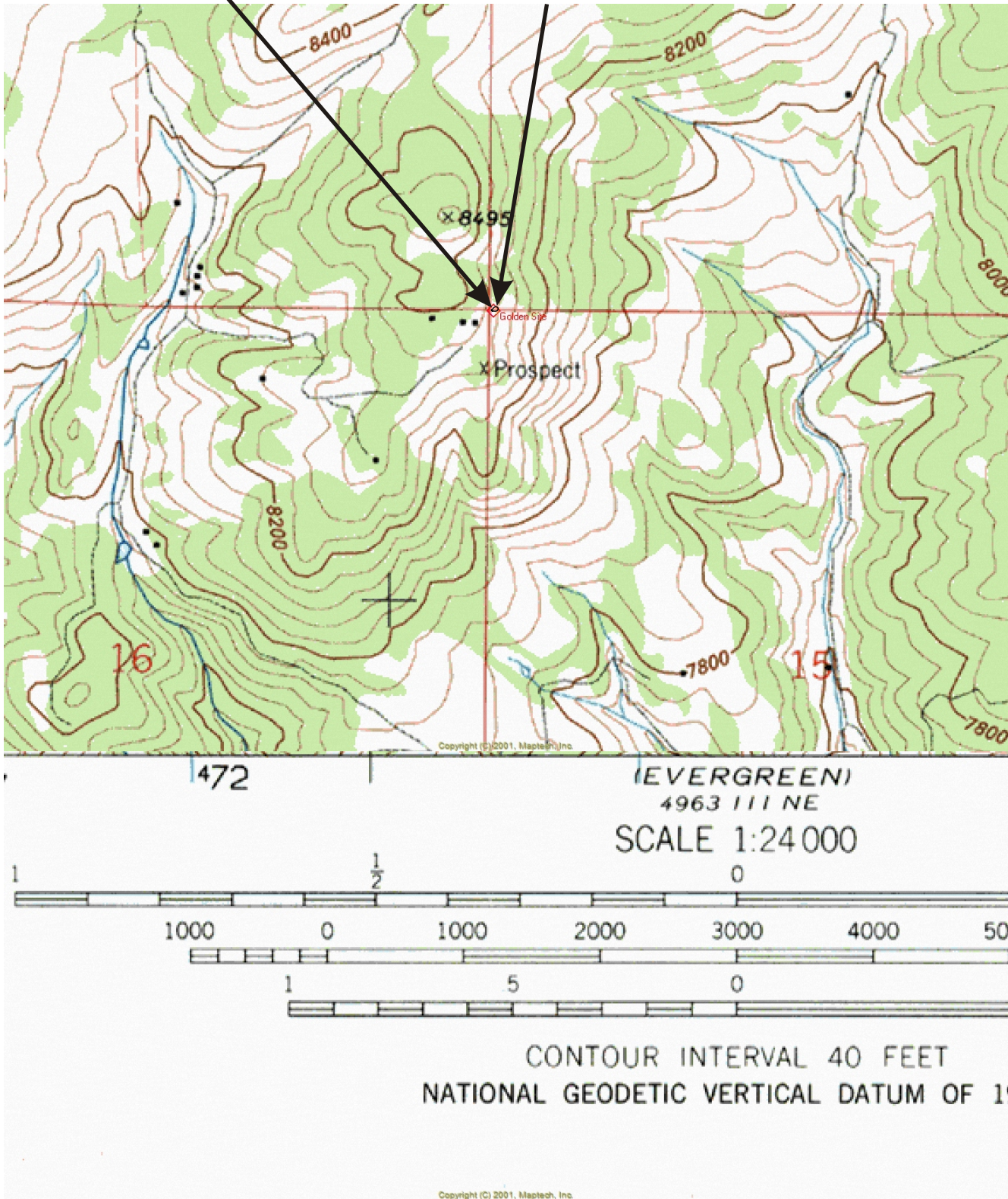


Exhibit demonstrating proposed 132.2 dBu contour overlaid on an aerial photograph of the proposed FMT site. The interference contour area is free of structures or dwellings and is uninhabited.

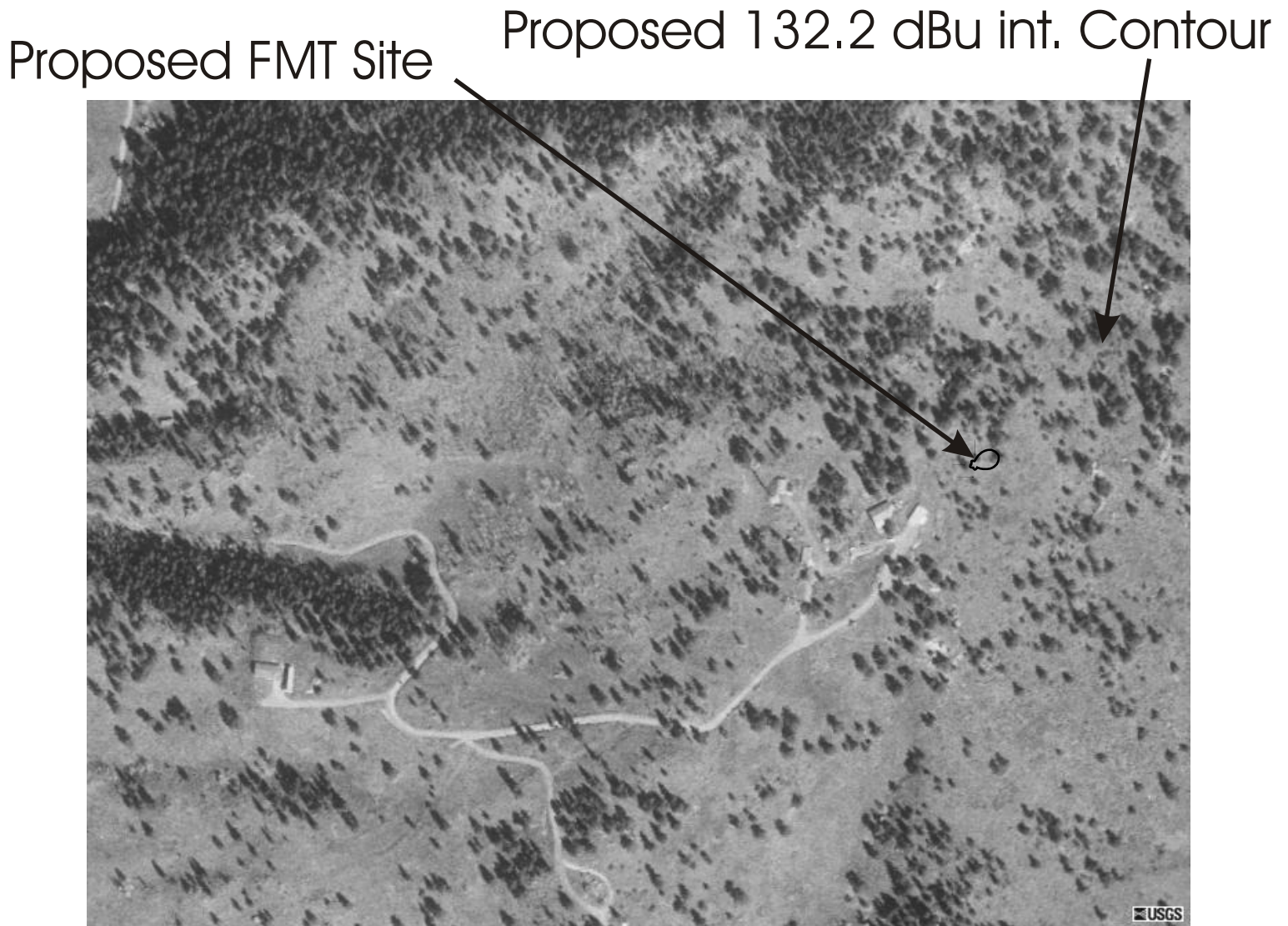


Exhibit Demonstrating nearest structure to proposed FMT site. Structure is a storage building, not a dwelling, thus is uninhabited.



Channel Study										
K245AD Minor Mod. to Nearby Tower										
REFERENCE	CH#	245D	-	96.9 MHz,	Pwr= 0.015 kW,	HAAT=0.0 M,	COR= 2547 M	DISPLAY DATES		
39 47 51 N				Average Protected F(50-50)= 3.48 km				DATA	05-08-04	
105 19 50 W	Ave.	F(50-10)	40 dBu= 11.2	54 dBu= 4.9	80 dBu= 1.6	100 dBu= .3		SEARCH	05-11-04	
CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT* (in km)
247C Boulder	KBCOFM	LIC DEY CO	14.2 194.2	13.27 BMLH19960506KA	39 54 48 105 17 32	96.874 220	2583 8.6	65.4 Citicasters	-0.26<	-52.19*< Licenses, L.p.
247C Boulder	ALLO	USE CO	14.2 194.2	13.27 record BLH850626KN	39 54 48 105 17 32	100.000 195	2558 8.1	63.4	0.21<	-50.15*<
Coordinates updated from LIC										
243C Evergreen	KXPK	LIC CN CO	224.6 44.6	18.92 BLH19940701KC	39 40 35 105 29 09	100.000 767	3281 16.0	98.3 Entravision	1.33<	-79.41*< Holdings, Lic
243C Evergreen	ALLO	USE CO	164.3 344.3	26.43	39 34 06 105 14 50	100.000 269	2558 9.6	69.9	13.15	-43.49*<
245D Arvada	K245AD	APP DC CO	270.0 90.0	0.07 BMPFT20040202AAG	39 47 51 105 19 53	0.008 709	2597 51.7	13.8 Educational	-53.28*<	-18.02*< Communications
245D Arvada	K245AD	CP DC CO	221.0 41.0	4.67 BNPFT20030808ADB	39 45 57 105 21 59	0.008 279	2509 30.6	9.2 Educational	-27.95<	-11.07*< Communications
245C Pueblo	KCCY	LIC CY CO	160.8 340.8	123.63 BLH19940217KC	38 44 43 104 51 41	72.000 809	2946 203.3	96.1 Capstar Tx	-83.24<	12.97 Limited Partner
245C Pueblo	ALLO	USE CO	144.5 324.5	163.86 record BPH830418AD	38 35 33 104 14 07	100.000 841	2558 213.7	101.1	-53.17<	47.46
Coordinates updated from CP										
245D Fort Collins	AP245	APP C CO	9.3 189.3	78.30 BNPFT20030317JQH	40 29 36 105 10 52	0.050 424	2075 59.1	17.9 Regent Broadcasting	15.25	46.23 Of Ft.
245D Loveland	AP245	APP DE CO	9.3 189.3	78.30 BNPFT20030312AEP	40 29 36 105 10 52	0.002 427	2078 27.2	7.1 Educational	47.17	57.04 Communications
243D Boulder	KXPKF1	LIC DCN CO	29.1 209.1	20.74 BLFTB19950119TD	39 57 38 105 12 44	0.001 -249	1753 0.1	1.8 Entravision	10.93	18.78 Holdings, Lic
245D Kersey	AP245	APP DE CO	37.6 217.6	83.14 BNPFT20030312AWU	40 23 19 104 43 56	0.000 92	1528 0.0	0.0 Educational	71.49	40.63 Communications
245D Omega	AP245	APP C CO	7.7 187.7	83.93 BNPFT20030317AZN	40 32 47 105 11 50	0.010 508	2189 45.7	12.6 Horizon Christian Fellowsh	34.51	57.91
245D Fort Collins	AP245	APP C CO	13.7 193.7	89.87 BNPFT20030317BNO	40 35 00 105 04 41	0.250 5	1560 23.8	7.1 Educational	61.25	65.05 Media Foundati
245D Fort Collins, Etc.	K260AC	APP C CO	22.4 202.4	94.27 BMJPFT20030312AO	40 34 53 104 54 20	0.205 98	1588 41.7	12.1 Boulder Community Broadcas	44.99	54.36
245D Wellington	AP245	APP C CO	18.4 198.4	103.47 BNPFT20030317DAZ	40 40 50 104 56 32	0.028 292	1822 42.9	12.9 Radio Assist Ministry Inc.	54.43	68.02
245C2 Steamboat Springs	KBCRFM	LIC H CO	300.3 120.3	148.99 BMLH20010118ACB	40 27 43 106 50 57	27.500 -5	2542 101.9	23.2 Kbcr, Inc.	45.46	121.60
245C2 Steamboat Springs	ALLO	USE CO	300.3 120.3	148.99	40 27 43 106 50 57	50.000 11	2558 115.0	26.5	32.35	118.26
247D Silverthorne	K248AP	CP CN CO	252.3 72.3	66.39 BPFT19970512TC	39 36 50 106 04 02	0.105 -519	2861 0.7	5.7 Salisbury Broadcasting Col	64.15	60.63
Translator for KTUNFM, Eagle, CO										
248D Silverthorne	K248AP	LIC H CO	252.3 72.3	66.39 BLFT20010713ABO	39 36 50 106 04 02	0.105 -519	2861 0.7	5.7 Salisbury Broadcasting Col	64.15	60.63

ERP and HAAT are on direct line to and from reference station.  
 "\*\*\*Affixed to 'IN' or 'Out' values = site inside protected contour.  
 "<" = Station meets FCC minimum distance spacing for its class. "<" = Contour Overlap

Terrain and Contour Study

N. Lat. = 39 47 51 W. Lng. = 105 19 50

HAAT and Distance to Contour - FCC Method - 30 Arc. Sec.

Minor Modification to K245AD

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	40-F1	100-F1	132.2-F1
000	2401.8	145.2	0.0003	-34.67	0.151	2.68	9.52	0.04	0.00
030	2075.7	471.3	0.0051	-22.90	0.585	10.19	36.88	0.16	0.00
060	1920.4	626.6	0.0140	-18.54	0.966	15.62	55.43	0.26	0.01
090	1884.4	662.6	0.0101	-19.95	0.822	14.47	52.87	0.22	0.01
120	1925.4	621.6	0.0012	-29.07	0.287	6.53	29.70	0.08	0.00
150	2162.0	385.0	0.0003	-34.92	0.147	3.45	15.34	0.04	0.00
180	2249.9	297.1	0.0005	-33.03	0.182	3.83	14.93	0.05	0.00
210	2426.1	120.9	0.0002	-36.19	0.127	2.27	7.93	0.03	0.00
240	2454.4	92.6	0.0005	-32.88	0.185	2.55	8.40	0.05	0.00
270	2673.3	-126.3	0.0003	-34.57	0.153	1.61	4.29	0.04	0.00
300	2689.6	-142.6	0.0003	-34.76	0.149	1.61	4.25	0.04	0.00
330	2677.9	-130.9	0.0005	-33.44	0.174	1.61	4.58	0.05	0.00

Ave El= 2295.07 M HAAT= 251.93 M AMSL= 2547

Channel Study - vs KCCY (area view)  
K245AD Minor Mod. to Nearby Tower

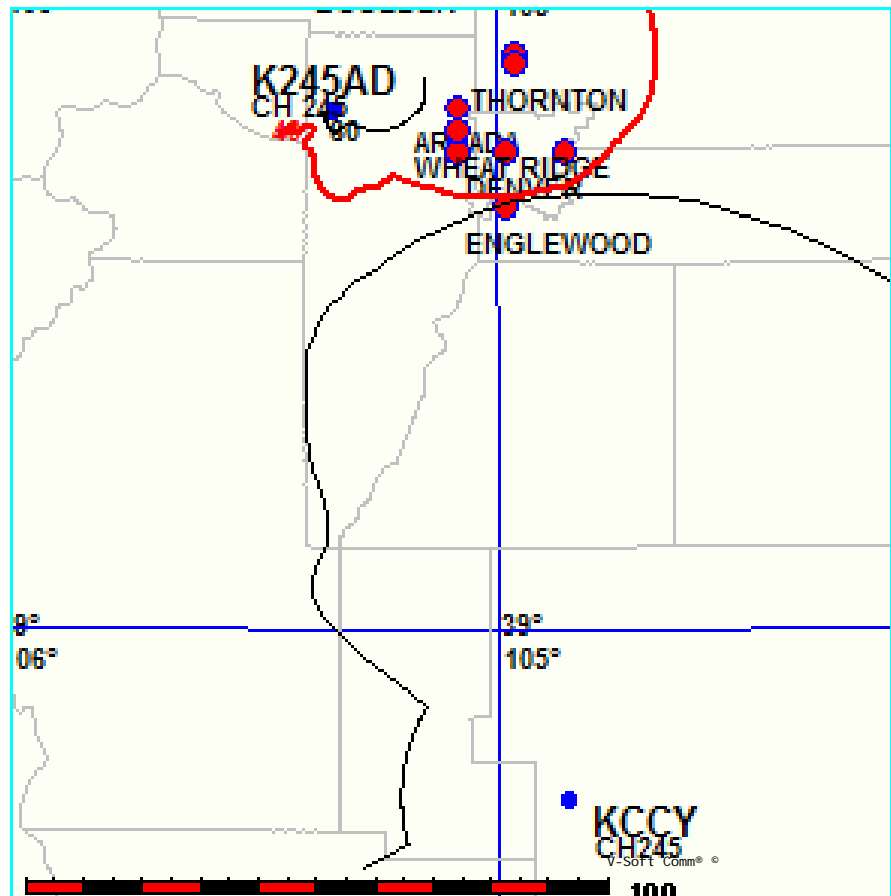
FMCONT Allocation Study

05-11-2004

K245AD CH 245 D  
.015 kW 2547M COR DA  
Prot. = 60 dBu  
Intef. = 40 dBu

KCCY CH 245 C  
72kW, 2946 M COR  
Prot. = 60 dBu  
Intef. = 40 dBu  
File # BLH19940217KC

1: 1, 378, 906



Channel Study - vs KCCY (detailed view)  
K245AD Minor Mod. to Nearby Tower

FMCONT Allocation Study

05-11-2004

K245AD CH 245 D  
.015 kW 2547M COR DA  
Prot. = 60 dBu  
Intef. = 40 dBu

KCCY CH 245 C  
72kW, 2946 M COR  
Prot. = 60 dBu  
Intef. = 40 dBu  
File # BLH19940217KC

1: 625, 000

