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MINOR CP MODIFICATION APPLICATION  
K268CS, Las Vegas, NV

**TECHNICAL STATEMENT**

This technical statement and attached exhibits have been prepared on behalf of Beasley Media Group, LLC (“Beasley”), Assignee of translator station K268CS, Facility ID number 157046. The applicant proposes to change the location of the proposed translator. This translator will rebroadcast Facility ID 57281, KCYE (FM), Boulder City, NV as a fill-in translator in compliance with 47 CFR 74.1203. The translator community of license will remain Las Vegas, NV.

**Facilities Proposed**

Location (NAD27)	36° 08' 55" N Latitude, 115° 09' 15" W Longitude
Channel	268D (101.5MHz)
Tower Overall AGL Height-	350m
Tower ASR	N/A
Proposed Antenna	ERI LP-2E-HW-DA
Antenna AGL Height-	344m
Site AMSL Height-	620m
COR AMSL Height	964m
HAAT	n/a
ERP	250w DIRECTIONAL (SEE EXHIBIT A)

## Interference Study

ComStudy 2.2 search of channel 268 (101.5 MHz Class D) at 36-08-55.0 N, 115-09-15.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
KWID	LAS VEGAS	NV 270 C0	24.70	0.00	155.9	-29.44 dB Exhibit B
KVXL-LP	LAS VEGAS	NV 266 LP100	9.02	6.00	305.2	-4.49 dB Exhibit C
KIXF	BAKER	CA 268 B	105.30	0.00	221.4	0.07 dB Exhibit E
K265EZ	HENDERSON	NV 265 D	20.55	0.00	139.4	3.3 dB
K265EZ	HENDERSON	NV 265 D	20.55	0.00	139.4	3.3 dB
K267BZ	HALLORAN SPRINGS	CA 267 D	58.75	0.00	190.5	4.02 dB
KCLS	LEEDS	UT 268 C0	167.95	0.00	61.9	7.83 dB
KXMK	OATMAN	AZ 267 C2	142.94	0.00	149.9	18.90 dB
K268AC	KINGMAN	AZ 268 D	163.92	0.00	136.0	18.82 dB
K267BZ	HALLORAN SPRINGS	CA 265 D	37.31	0.00	237.0	18.18 dB
K215FA	NORTH LAS VEGAS	NV 215 D	19.84	0.00	325.1	19.8
900607ME	BAKER	CA 268 B	128.59	0.00	220.5	20.96 dB
K269GB	CALNEVAIR	NV 269 D	142.94	0.00	149.9	29.33 dB
KPKK	AMARGOSA VALLEY	NV 266 C1	124.32	0.00	296.6	31.54 dB
K265CJ	LAUGHLIN	NV 265 D	105.99	0.00	159.7	38.91 dB
K265CJ	LAUGHLIN	NV 265 D	105.99	0.00	159.7	38.91 dB

### COMPLIANCE, 74.1201(g), 74.1203(d), 74.1233(a)(1), and 74.1204(d)

Exhibit B demonstrates compliance with 74.1201(g) governing the use of a translator as a fill-in for an FM station. The 60dBu contour of the proposed K268CS will be completely contained within the 1mV/m (60dBu) contour of KCYE (FM).

Exhibit C demonstrates compliance with 74.1204(d). There will be no location at ground level where the proposed K268CS will be in excess of 40dB above KWID or KVXL-LP<sup>1</sup>.

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<sup>1</sup> Additionally, there will be no increase in 2<sup>nd</sup> adjacent overlap from the currently approved CP for K268CS.

As demonstrated in Exhibit D, this application remains compliant with FCC rule 74.1233(a)(1) requiring any minor change of a translator's facilities to continue to provide 1mV/m service to some portion of its previously authorized service area.

Exhibits E demonstrates compliance with 74.1204(a). There are no impermissible contour overlaps to any other facilities, specifically, KIXF.

### **Environmental Exhibit**

The proposed K268CS facility as proposed will utilize a directional antenna located on a tower attached to an existing building. The RF density near the tower was calculated using a 2-level half-wave spaced antenna setting at 250 watts horizontal and vertical and 18m above the base of the roof.

Although there is the potential for public exposure at the roof level of this structure, based upon the "FM" Model Calculator<sup>2</sup>, the RF at roof level will be well under 5% of the maximum allowable 200  $\mu\text{W}/\text{cm}^2$ . The maximum RF level of 6.9  $\mu\text{W}/\text{cm}^2$  (3.45% of MPE) is achieved 29.8m away from the tower base. This is well beyond the roof line of the building. The FM Model output is shown in Exhibit F.

Based upon the preceding statement, it is believed the impact of the proposed operation should not be considered to be a factor at rooftop level as defined under §1.1307(b)(3), therefore the proposed K268CF operation is categorically excluded from further environmental review under §1.1306 of the FCC rules and regulations.

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<sup>2</sup> <https://www.fcc.gov/general/fm-model>

Respectfully Submitted

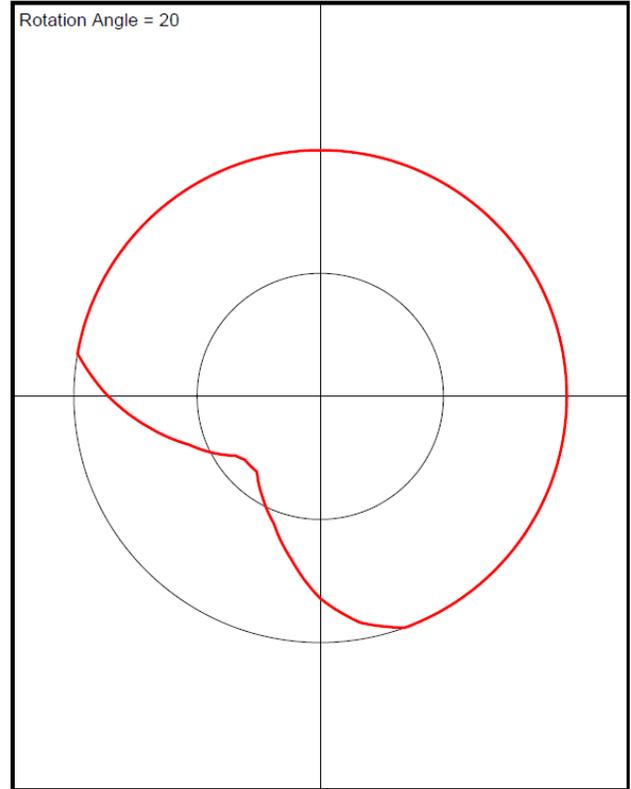
A handwritten signature in black ink that reads "Bert Goldman". The signature is written in a cursive style with a long, sweeping underline.

Bert Goldman  
Goldman Engineering Mgmt.  
1511 Radcliffe Way  
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# EXHIBIT A: ERI LP-2E-HW-DA Pattern

K268CS Proposed Pattern  
Pre-Rotation Antenna Pattern....

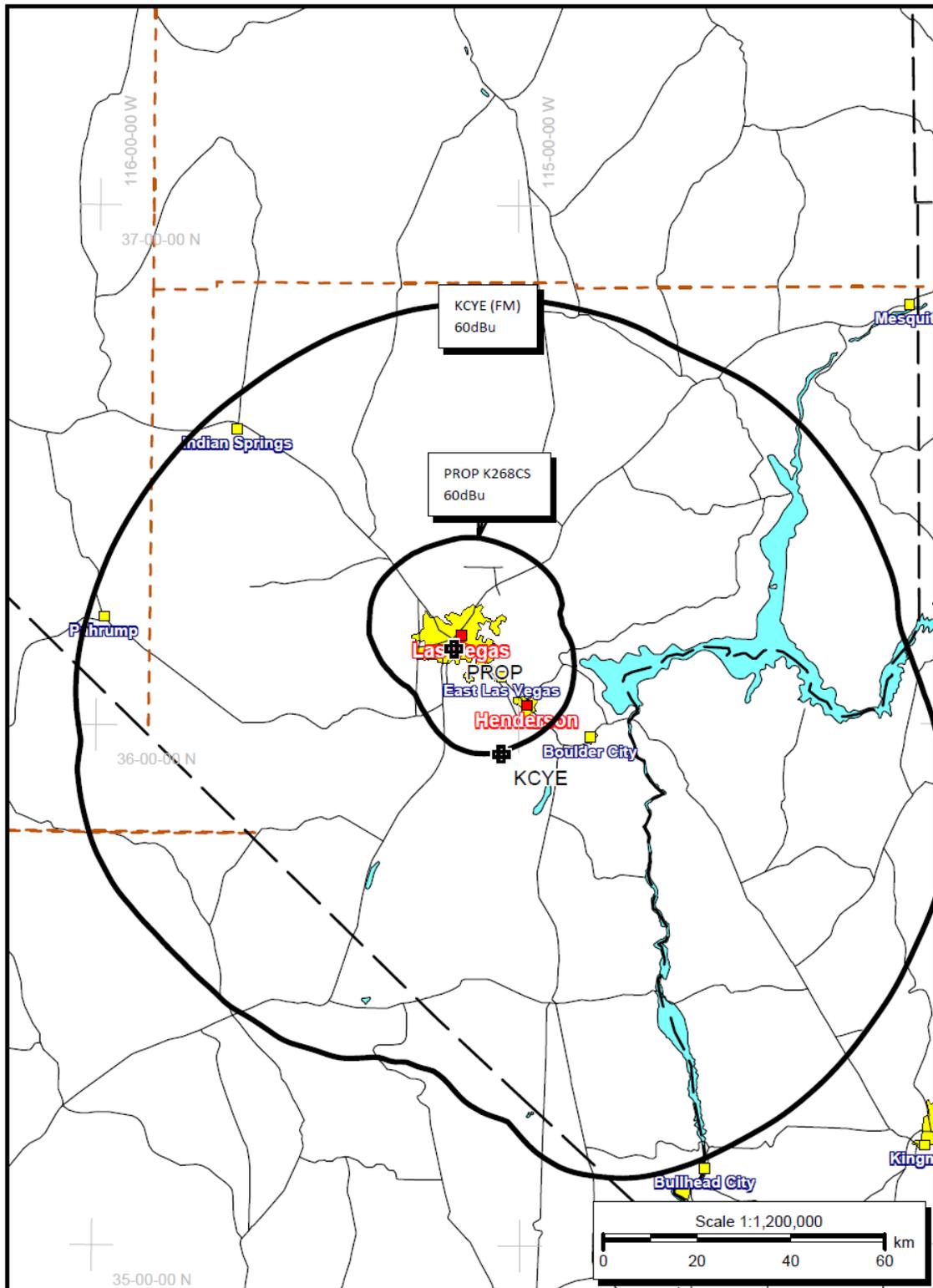
Azimuth (deg)	Relative Field
0.0	1.0
5.0	1.0
10.0	1.0
15.0	1.0
20.0	1.0
25.0	1.0
30.0	1.0
35.0	1.0
40.0	1.0
45.0	1.0
50.0	1.0
55.0	1.0
60.0	1.0
65.0	1.0
70.0	1.0
75.0	1.0
80.0	1.0
85.0	1.0
90.0	1.0
95.0	1.0
100.0	1.0
105.0	1.0
110.0	1.0
115.0	1.0
120.0	1.0
125.0	1.0
130.0	1.0
135.0	1.0
140.0	1.0
145.0	0.9665
150.0	0.933
155.0	0.877
160.0	0.821
165.0	0.747
170.0	0.673
175.0	0.6115
180.0	0.55
185.0	0.51
190.0	0.47
195.0	0.435
200.0	0.4
205.0	0.4
210.0	0.4
215.0	0.42
220.0	0.47
225.0	0.52
230.0	0.57
235.0	0.64
240.0	0.71
245.0	0.785
250.0	0.86
255.0	0.93
260.0	1.0
265.0	1.0
270.0	1.0
275.0	1.0
280.0	1.0
285.0	1.0
290.0	1.0
295.0	1.0
300.0	1.0
305.0	1.0
310.0	1.0
315.0	1.0



320.0	1.0
325.0	1.0
330.0	1.0
335.0	1.0
340.0	1.0
345.0	1.0
350.0	1.0
355.0	1.0

EXHIBIT B-

Proposed K268CS 74.1201(g) Compliance



# EXHIBIT C1 – 74.1204(d) Compliance to KWID (FM)

K268CS Las Vegas, NV  
 74.1204(d) Showing  
 Translator or LPFM Maximum Licensed ERP = 0.25  
 Translator or LPFM Antenna Height AG = 344 Meters  
 K268CS Antenna Model = LPX2H

Protected Station's Contour = 88.70285 dBu  
 Translator's or LPFM's full Interference contour 128.70285

Review Azimuth = 0 Degrees True  
 Relative Field on the horizon at Review Azimuth = 1.000  
 Translator/LPFM ERP on the horizon at Review Azimuth = 0.25 kW  
 Distance between stations = 24.7 km  
 Protected Station= KWID, 47 kW, 1370 M Meters COR AMSL

Depression Angle From Horizon(Deg)	Vertical Relative Field	Horizontal Relative Field	ERP (kw)	Dist to IX Contour Along Dep. Angle(m)	Dist to IX Contour From Tower Base(m)	Height IX Above Ground (m)
00.00	1.0	1.0	0.2500	040.7219	040.7219	344.000
05.00	0.984	1.0	0.2421	040.0703	039.9178	340.508
10.00	0.938	1.0	0.2200	038.1971	037.6168	337.367
15.00	0.865	1.0	0.1871	035.2244	034.0242	334.883
20.00	0.772	1.0	0.1490	031.4373	029.5414	333.248
25.00	0.665	1.0	0.1106	027.0800	024.5428	332.555
30.00	0.553	1.0	0.0765	022.5192	019.5022	332.740
35.00	0.442	1.0	0.0488	017.9991	014.7440	333.676
40.00	0.339	1.0	0.0287	013.8047	010.5750	335.127
45.00	0.248	1.0	0.0154	010.0990	007.1411	336.859
50.00	0.172	1.0	0.0074	007.0042	004.5022	338.635
55.00	0.112	1.0	0.0031	004.5608	002.6160	340.264
60.00	0.068	1.0	0.0012	002.7691	001.3845	341.602
65.00	0.037	1.0	0.0003	001.5067	000.6368	342.634
70.00	0.018	1.0	0.0001	000.7330	000.2507	343.311
75.00	0.007	1.0	0.0000	000.2851	000.0738	343.725
80.00	0.002	1.0	0.0000	000.0814	000.0141	343.920
85.00	0.001	1.0	0.0000	000.0407	000.0035	343.959
90.00	0.0	1.0	0.0000	000.0041	000.0000	343.996

# EXHIBIT C2 – 74.1204(d) Compliance to KVXL-LP

K268CS Las Vegas, NV  
 74.1204(d) Showing  
 Translator or LPFM Maximum Licensed ERP = 0.25  
 Translator or LPFM Antenna Height AG = 344 Meters  
 K268CS Antenna Model = LPX2H

Protected Station's Contour = 61.71918 dBu  
 Translator's or LPFM's full Interference contour 101.71918

Review Azimuth = 0 Degrees True  
 Relative Field on the horizon at Review Azimuth = 1.000  
 Translator/LPFM ERP on the horizon at Review Azimuth = 0.25 kW  
 Distance between stations = 9.0 km  
 Protected Station= KVXL-L, .1 kW, 720 M Meters COR AMSL

Depression Angle From Horizon(Deg)	Vertical Relative Field	Horizontal Relative Field	ERP (kw)	Dist to IX Contour Along Dep. Angle(m)	Dist to IX Contour From Tower Base(m)	Height IX Above Ground (m)
00.00	1.0	1.0	0.2500	909.9363	909.9363	344.000
05.00	0.984	1.0	0.2421	895.3774	891.9702	265.963
10.00	0.938	1.0	0.2200	853.5203	840.5534	195.788
15.00	0.865	1.0	0.1871	787.0949	760.2753	140.285
20.00	0.772	1.0	0.1490	702.4709	660.1067	103.741
25.00	0.665	1.0	0.1106	605.1077	548.4138	088.270
30.00	0.553	1.0	0.0765	503.1948	435.7794	092.403
35.00	0.442	1.0	0.0488	402.1919	329.4563	113.312
40.00	0.339	1.0	0.0287	308.4684	236.3005	145.720
45.00	0.248	1.0	0.0154	225.6642	159.5687	184.431
50.00	0.172	1.0	0.0074	156.5091	100.6021	224.107
55.00	0.112	1.0	0.0031	101.9129	058.4548	260.518
60.00	0.068	1.0	0.0012	061.8757	030.9378	290.414
65.00	0.037	1.0	0.0003	033.6676	014.2286	313.487
70.00	0.018	1.0	0.0001	016.3789	005.6019	328.609
75.00	0.007	1.0	0.0000	006.3696	001.6486	337.847
80.00	0.002	1.0	0.0000	001.8199	000.3160	342.208
85.00	0.001	1.0	0.0000	000.9099	000.0793	343.094
90.00	0.0	1.0	0.0000	000.0910	000.0000	343.909

EXHIBIT D- 74.1233(a)(1) Compliance

Proposed K268CS Vs. Licensed K268CS 60dBu

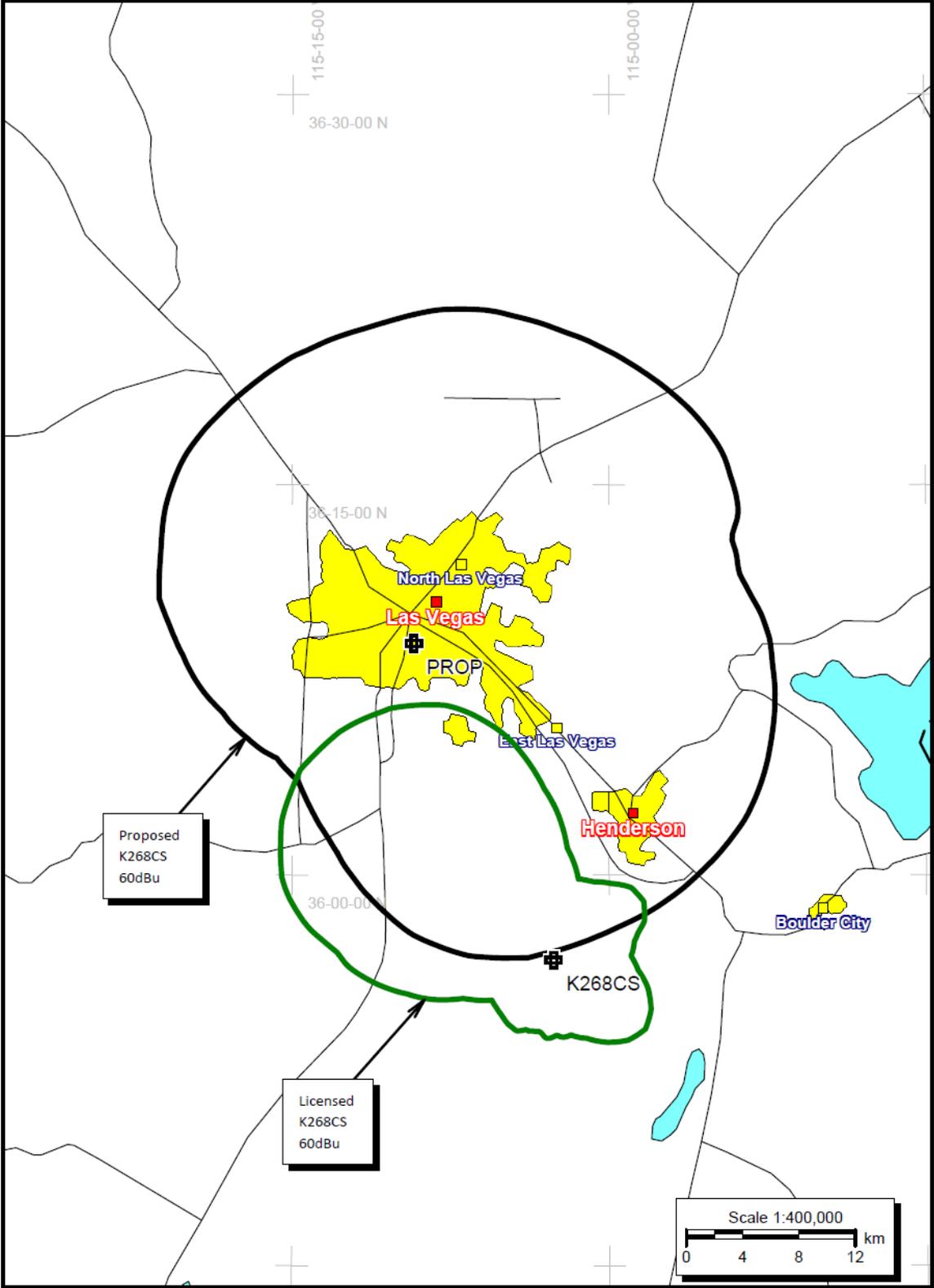
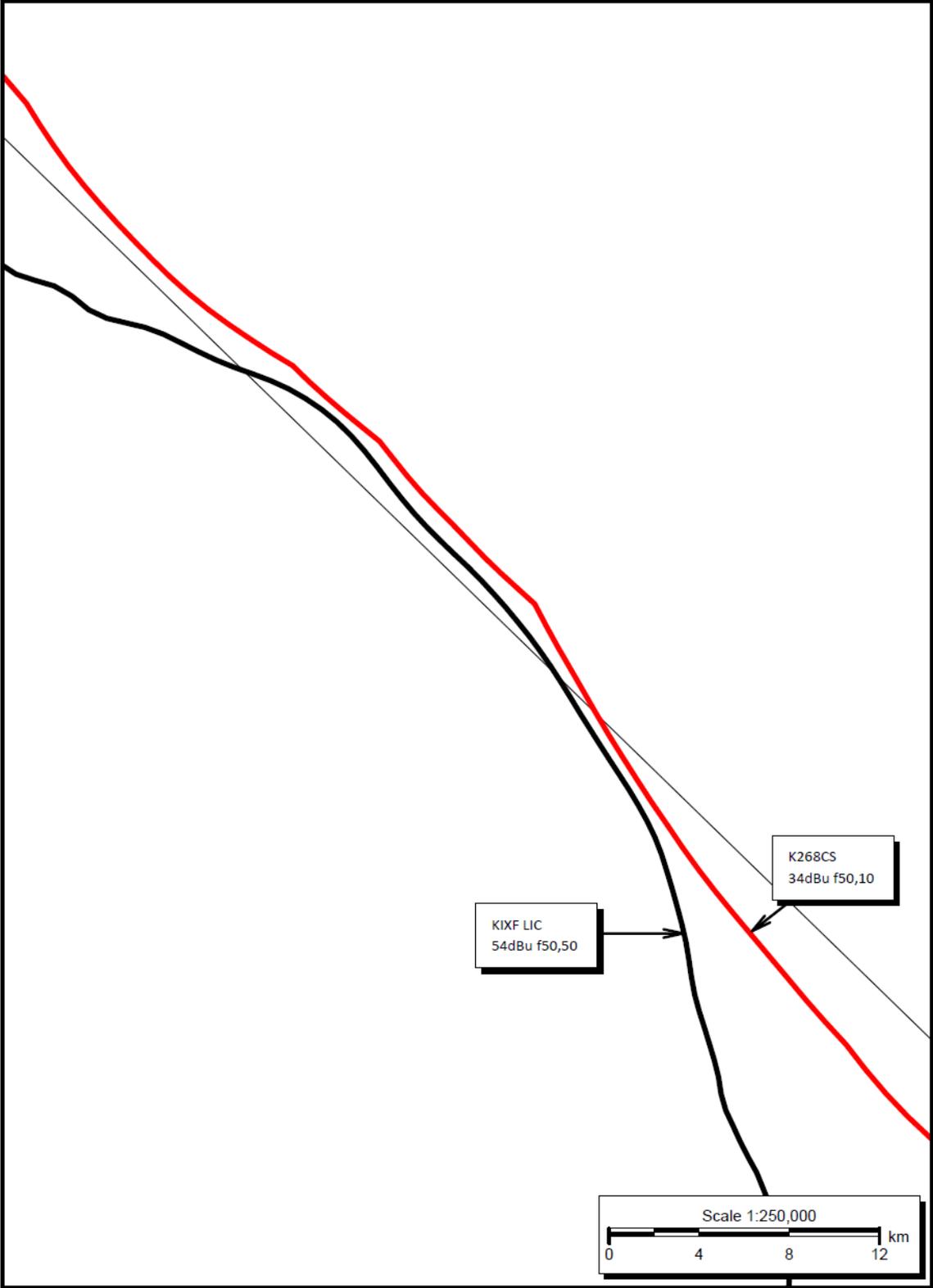
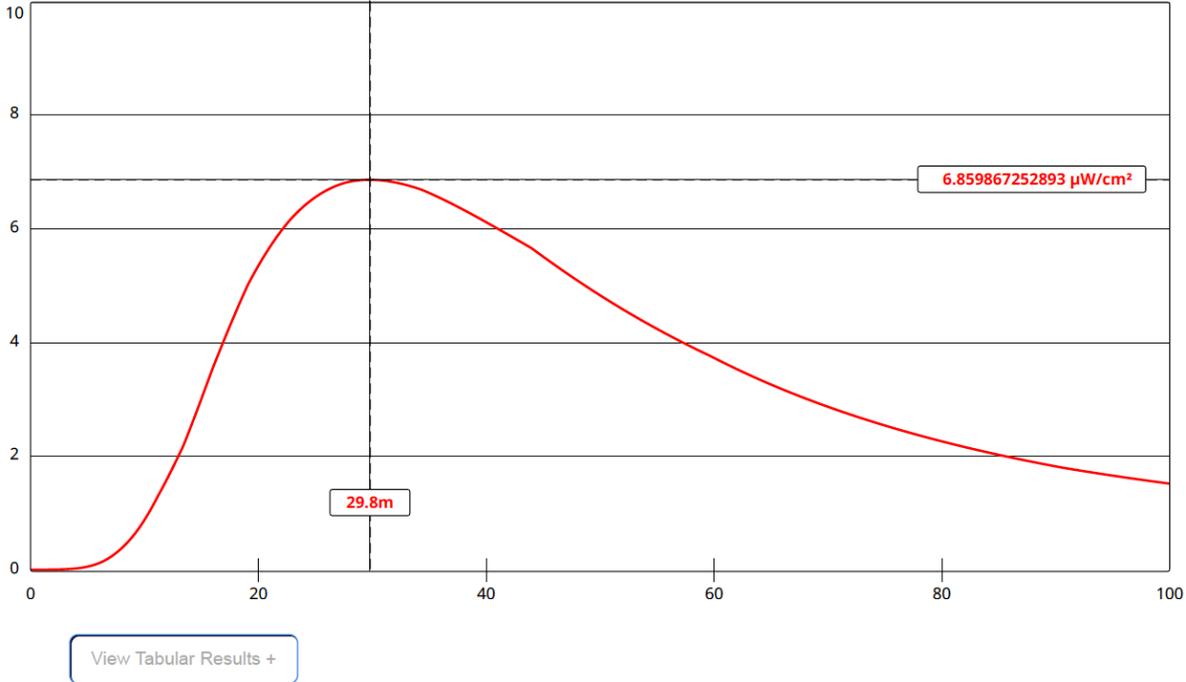


EXHIBIT E- 74.1204(a) Compliance

Proposed K268CS Protection to KIXF



# EXHIBIT F- RFR Calculations



Channel Selection	Channel 268 (101.5 MHz)		
Antenna Type +	EPA Type 2: Opposed V Dipole		
Height (m)	18	Distance (m)	100
ERP-H (W)	250	ERP-V (W)	250
Num of Elements	2	Element Spacing (λ)	0.5
Num of Points	500	Apply	