

CITY OF LICENSE
CALL LETTERS
FACILITY ID
PREPARED FOR
VERSION
JOB

Westley, CA
KCBP
184977
Modesto Peace/Life Center
1.1
118028

CONSOLIDATED

ENGINEERING EXHIBIT

FCC Form 340 - Section VII - FM Engineering

ENGINEERING STATEMENT
PROPOSED AMENDMENT TO A PENDING MINOR-MODIFICATION OF
ORIGINAL CONSTRUCTION PERMIT
KCBP, Westley, CA
95.5MHz - 0.42kW ERP - ND
Modesto Peace/Life Center

SUMMARY

Modesto Peace/Life Center (“MPLC”) hereby proposes a minor-amendment to BMPED-20180426ABW - a pending minor-mod to the original Construction Permit BNPED-20100224ABX. This amendment specifies a new location, and changes the ERP, elevation, and the antenna.

This is a non-reserved-band §73.215 proposal. The original CP calls for a time-share with Calvary Chapel of Turlock, Inc. (BNPED-20100226AGO). No changes in the time share agreement are proposed herein.

EXPEDITED PROCESSING REQUESTED

The applicant respectfully requests expedited processing of this application. The underlying original CP expires on 8/12/2018. MPLC has scheduled to build this site around July 20, 2018.

307(b) FAIR DISTRIBUTION OF SERVICE

KCBP is an NCE CP on a “commercial” channel granted via the Third Channel Reservation Standard, in the 2010 Filing Window. MPLC was ultimately granted this CP on the basis of localism and diversity points, along with Calvary Chapel. It was not granted on the basis of superior population or area coverage. The Commission has consistently held that, because meeting the Reservation Standard was a threshold requirement and not judged comparatively against other applicants, an applicant to modify such facilities need only demonstrate that it continues to qualify under this standard. As shown by **Exhibit E-1**, this proposal continues to meet the Reservation Standard. 2029 persons, or 83.4% of the total

BROWN BROADCAST SERVICES
INCORPORATED

Michael D. Brown

3740 S.W. Cornus St.

Portland, Oregon 97219-7418

503-245-6065

population of 2434 persons within the 60dBu contour, will be provided with a second NCE service.¹

COMMUNITY COVERAGE

Exhibit 16 shows that the entire community of license is within the proposed 70dBu contour.

¹2010 Census, June 22, 2018 FCC database

Exhibit E-1

Fair Distribution of Service

KCBP, Westley, CA

Proposed CP MOD

0.42kW ERP - ND

Brown Broadcast Services, Inc.
 Job: KCBP move to Farm 1 Site.fmj
 Master Database: 2018_Jun_24.fmd
 Lat: N37:32:10 Lon: W121:13:40 NAD-27
 Scale: 1:100000
 Channel: 238 Class: A

rfInvestigator Version 3.8.16
 by rfSoftware, Inc.
 Date: 6/24/2018 10:57:34 PM
 Key:

Cyan = 2nd Service
 Red = 3rd or greater service

1. KYCC, Stockton CA	Proposed 60dBu:	2434 persons (2010 Census)
2. KYKL, Tracy CA	1st NCE Service:	0 0%
Proposal is surrounded by KUOP, Stockton, CA (not shown)	2nd NCE Service:	2029 83.43%

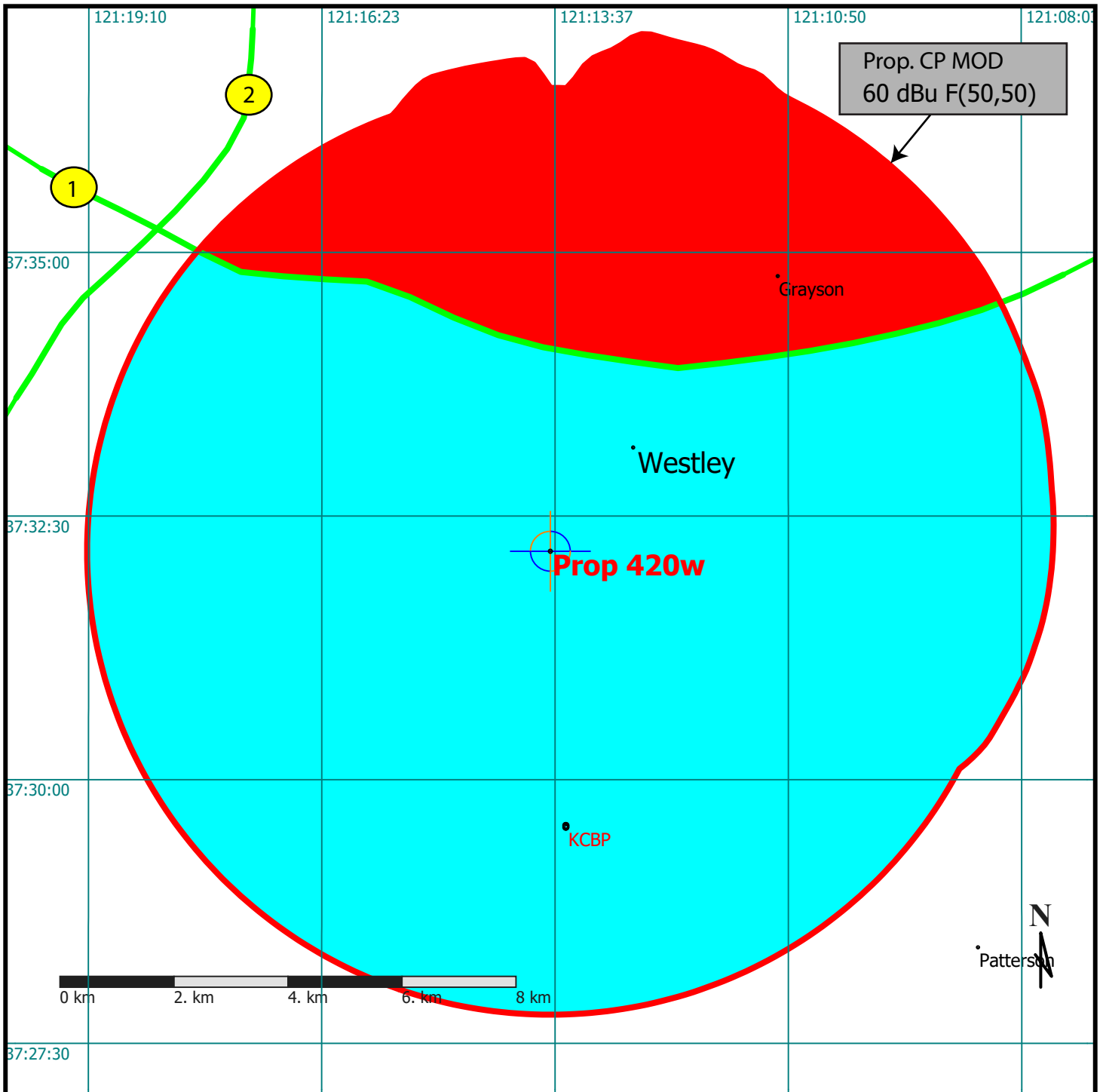


Exhibit 16

Community of License Coverage

Brown Broadcast Services, Inc.
Job: KCBP move to Farm 1 Site.fmj
Master Database: 2018_Jun_24.fmd
Lat: N37:32:10 Lon: W121:13:40 NAD-27
Scale: 1:150000
Channel: 238 Class: A

rfInvestigator Version 3.8.16
by rfSoftware, Inc.
Date: 6/24/2018 11:25:55 PM
Key:
City Grade
Protected

Entire Community of License is within proposed 70dBu

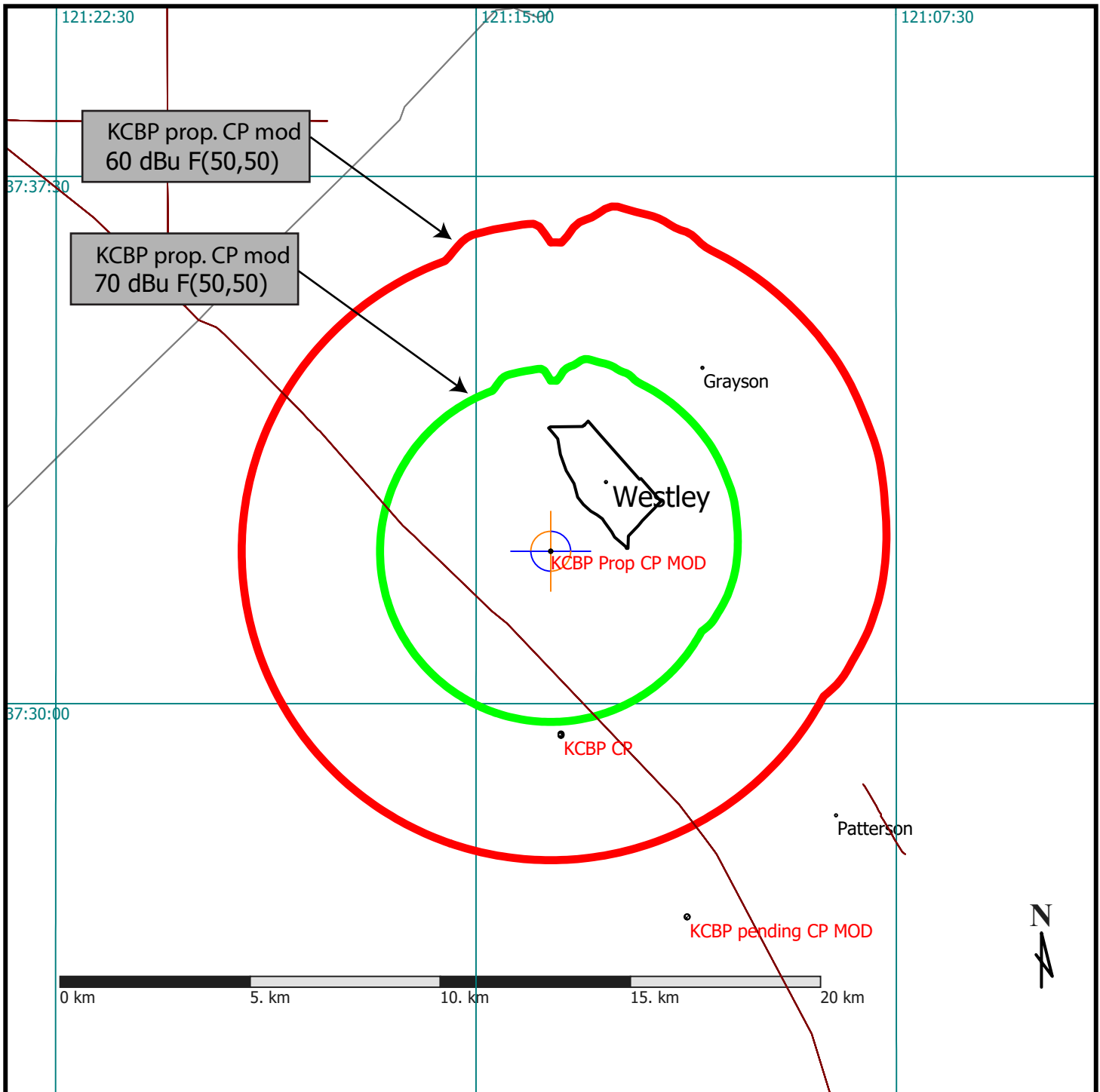


EXHIBIT 18

SPACING STUDY

CHANNEL STUDY

This proposal meets all §73.207 spacing requirements, except with respect to KGMZ-FM, San Francisco, CA. KGMZ-FM, however, complies with the §73.215 spacing limit, which is 96km. Contour protection to this station is shown by **Exhibit 20**. §73.215 processing with respect to KGMZ-FM is hereby requested.

Modesto Peace/Li fe Center					DI SPLAY DATES			
REFERENCE		CLASS = A			DATA 06-04-18			
37 32 10.0 N.		Current			Spacings to 3rd Adj.			SEARCH 06-24-18
121 13 40.0 W.		Channel 238 - 95.5 MHZ						

Call	Channel		Location		Azi	Di st	FCC	Margin

KCBP	CP -Z	238A	Westley	CA	176.8	4.81	115.0	-110.2
KTUR	CP -Z	238A	Westley	CA	176.8	4.84	115.0	-110.2*
KCBP	APP-Z	238A	Westley	CA	159.6	10.26	115.0	-104.7
KGMZ-FM	LIC	239B	San Franci sco	CA	279.5	108.09	113.0	-4.9**
KHOP	LIC	236B	Oakdale	CA	65.2	68.72	69.0	-0.28***
KRTY	LIC	237A	Los Gatos	CA	240.2	73.70	72.0	1.7
KKHK	LIC	238A	Carmel	CA	204.6	119.99	115.0	5.0
KNEV	LIC	238C	Reno	NV	34.2	233.02	226.0	7.0
KSKD	LIC	240A	Li vingston	CA	118.6	50.99	31.0	20.0
KUIC	LIC-N	237B1	Vacaville	CA	321.6	122.27	96.0	26.3
KSQQ	LIC	241A	Morgan Hill	CA	232.5	64.20	31.0	33.2
KSKD	RSV-A	240A	Dos Pal os	CA	140.7	67.19	31.0	36.2
NULL								
KYLD	LIC	235B	San Franci sco	CA	279.5	108.03	69.0	39.0

RSV-R = reserved - needs protection, RSV-A = allocation.

*KTUR is a time-share with KCBP

**Protection shown with 73.215 contour protection

***Fully-spaced with allowable rounding

KTUR, Westley, is the time-share CP of Calvary Chapel of Turlock.

FMOver calculations were done using V-Soft FM Commander software, using “HAAT method 0 (zero)”, 51 data points per radial, and the FCC-modified version of the NGDC 30 second terrain database. According to V-Soft, this combination results in “astounding agreement” with FCC software.

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PROTECTED ZONES REPORT

Protected zones report for KCBP.CP M on channel 238A 06-24-2018

Lat. 37 32 10.0 Lng. 121 13 40.0, ERP= 0.42 kw, HAAT= -92.3 m

Facility is okay with respect to AM station towers.

Closest AM Facility is KVIN, CERES, CA, L, DA2 at 63.9° at a distance of 15.4 km

Facility is okay with respect to FCC monitoring stations.

Closest FCC Monitoring Station is 50.9 km= Livermore, CA

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73.215 CONTOUR PROTECTION TO KGMZ-FM, SAN FRANCISCO

Modesto Peace/Life Center

KCBP.CP M CH 238 A 73.215 N
Lat= 37 32 10.0, Lng= 121 13 40.0
0.42 kW -92.3 m HAAT, 58 m COR
Prot.= 60 dBu, Intef.= 48 dBu

KGMZ-FM^ CH 239 B BMLH19930914KB
Lat= 37 41 23.0, Lng= 122 26 12.0
Max CIs: 50.0 kW 150 m HAAT, 207 m COR
Prot.= 54 dBu, Intef.= 54 dBu

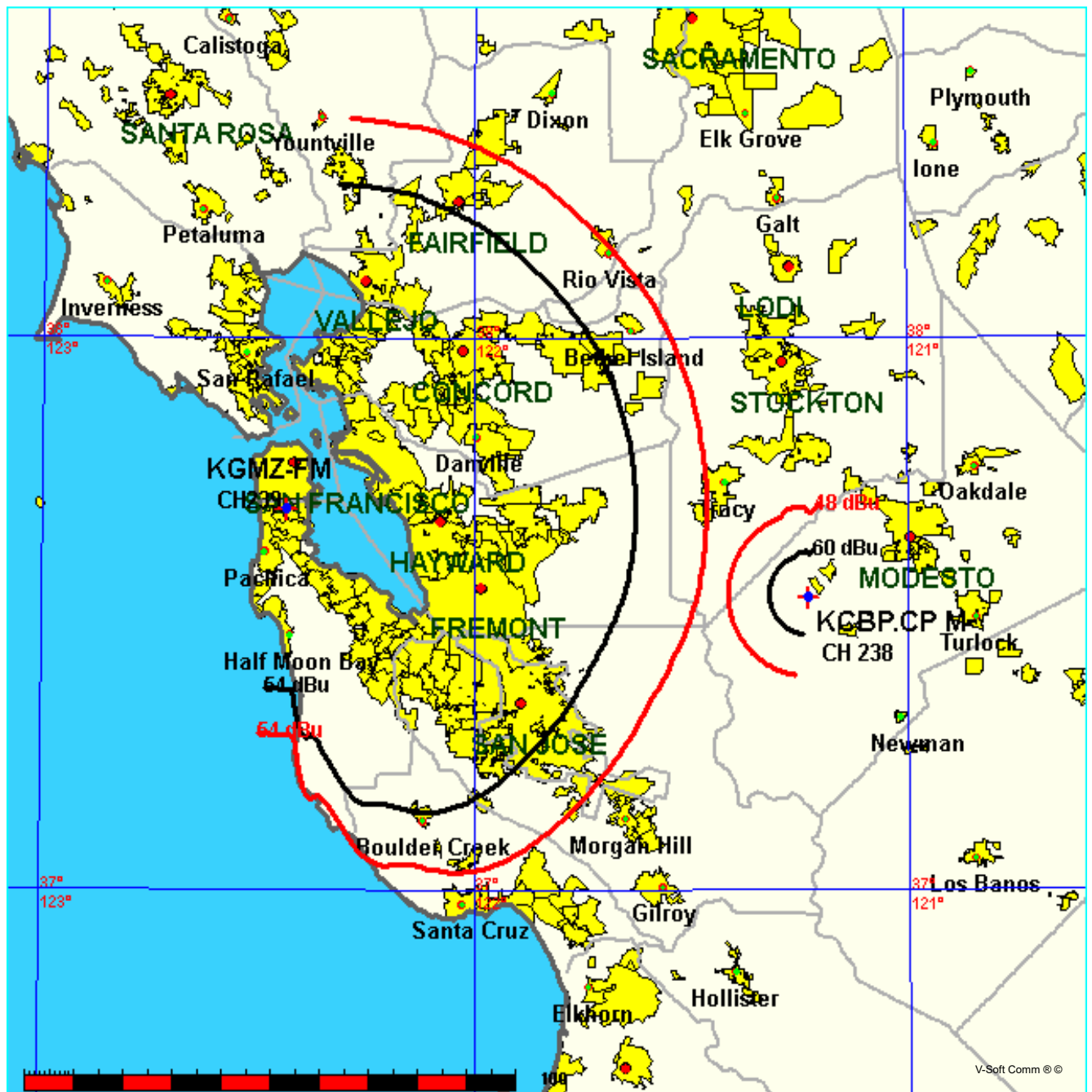


EXHIBIT 24

ENVIRONMENTAL PROTECTION ACT / NIER ANALYSIS

An Environmental Assessment is categorically excluded for this proposal in that no part of 47CFR §1.1307(a)(1) through (8) applies in this case, and RF exposures do not exceed FCC standards.

The applicant proposes mounting a new non-directional antenna on a 9 meter tower. The proposed center of radiation is 9m AGL. A 1 bay Jampro JLLP “Double V” antenna is proposed. The site is near a remote rural farmhouse, surrounded by orchards. There are no other RF facilities in the vicinity.

Calculations were made using FM Model (online version), using the appropriate “Type-2” setting. FM Model predicted a peak “ground-floor” exposure of $157.6\mu\text{W}/\text{cm}^2$, at 7.2 meters from the tower. This represents 78.8% of the Maximum Permissible Exposure (MPE) of $200\mu\text{W}/\text{cm}^2$ for uncontrolled environments.

There is one structure in the vicinity, with 2 floors. The upper floor is 6m below the proposed center of radiation, and at least 24m away,. FM Model predicted that the RF exposure on the 2nd floor at this horizontal distance, would be $45.6\mu\text{W}/\text{cm}^2$. Predicted exposures rapidly drop below this level, at distances greater than 24m.

An anti-climb device will be installed on the tower. The site will be posted with appropriate RF exposure warning signs. If tower climbing by authorized personnel becomes necessary, transmitter power will be reduced or operation will cease, as necessary, so as to not exceed the RF exposure limits.