

Technical Statement Regarding LMS File No. 0000034640 – AM Conditions

The KMIR-TV Construction permit, LMS File No. 0000034640, includes a special condition requiring a study of the potential impact of the installation of the KMIR-TV antenna on nearby AM radio stations KPFS and KXPS. The special condition appears on the construction permit because of the height of the KMIR-TV antenna support tower and the distance between the KMIR-TV transmitter site and the licensed KPSF and KXPS transmitter sites.

The FCC rule that governs such situations, 47 CFR 1.30002(b), requires notification before construction, and an analysis of potential impact, when a new antenna is to be installed on a structure within the lesser of 10 wavelengths or 3 kilometers of a directional AM station, the structure height is taller than 36 electrical degrees at the AM station's frequency, and the installation of the new antenna will be a significant modification of the structure. Although the KMIR-TV antenna will be installed on an existing tower that is taller than 36 electrical degrees, and is closer than 10 wavelengths to both KPSF on 1200 kHz and KXPS on 1010 kilohertz, it is exempted from those requirements because installation of the antenna on the existing tower will not be a significant modification as defined in 47 CFR 1.30002(d). There will be no increase in the height of the tower, it is grounded, rather than insulated, at its base, and it is not detuned.