

# COMPREHENSIVE TECHNICAL EXHIBIT

## Channel Study

KXRK Auxiliary @ KKLTV site  
Broadway Media Ls, LLC

REFERENCE  
40 39 35.0 N.  
112 12 05.0 W.

CLASS = C  
Current Spacings to 3rd Adj.  
Channel 242 - 96.3 MHz

DISPLAY DATES  
DATA 10-01-19  
SEARCH 10-01-19

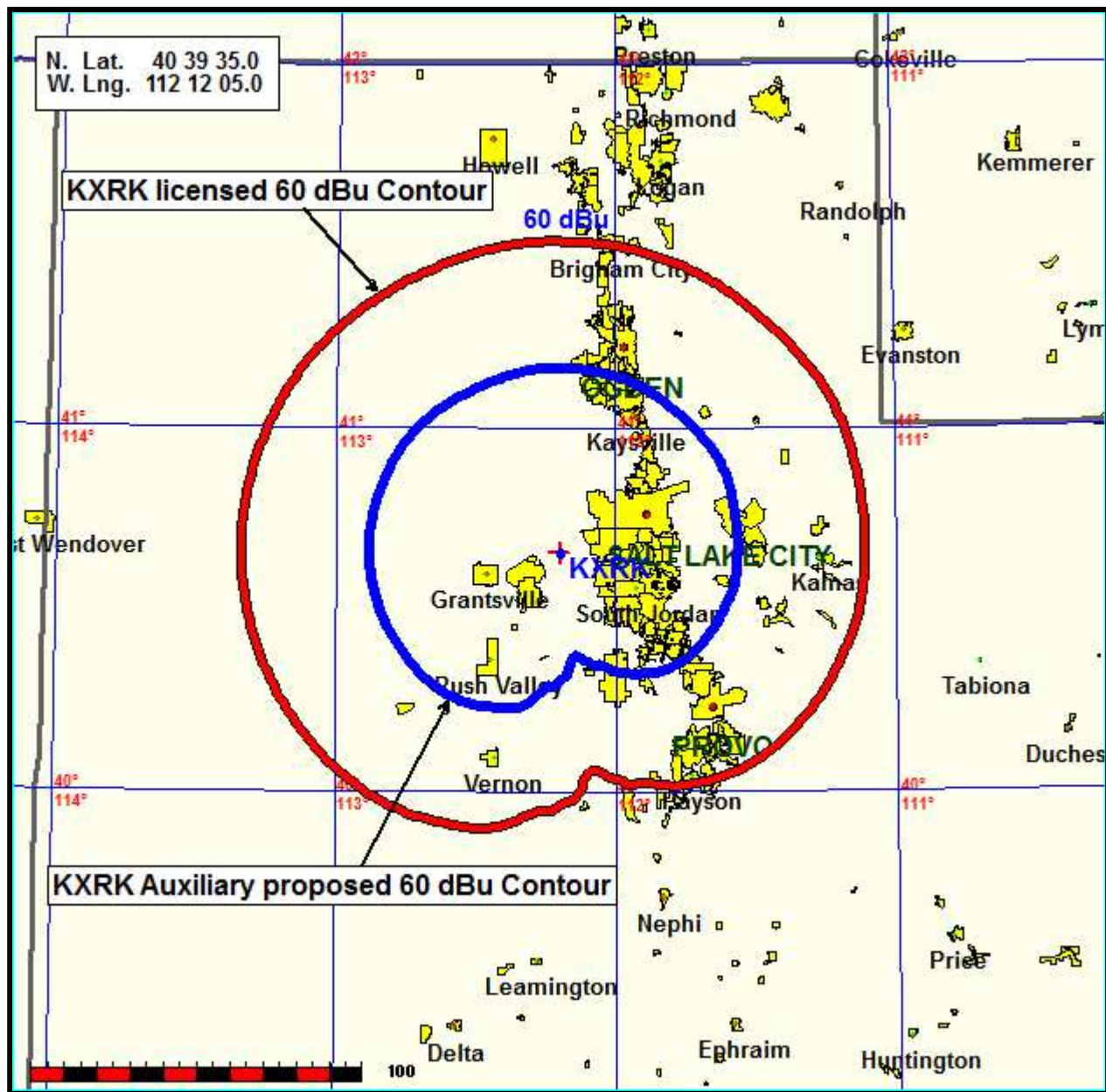
Call	Channel	Location	Azi	Dist	FCC	Margin
KXRK	LIC 242C	Provo	UT 0.0	0.00	289.5	-289.5
KQSW	LIC 243C	Rock Springs	WY 70.6	272.48	240.5	32.0
KKEX	LIC 244C1	Preston	ID 13.6	138.68	104.5	34.2
KLZX	LIC 240C3	Weston	ID 13.6	138.68	95.5	43.2
KUTC	LIC 239C1	Gunnison	UT 166.0	153.24	104.5	48.7
KQMB	LIC 244C	Levan	UT 156.3	160.35	104.5	55.9
KEGH	LIC 296C	Woodruff	UT 76.6	104.24	47.5	56.7
KLIX-FM	LIC 243C1	Twin Falls	ID 318.3	285.05	208.5	76.6
KWFI-FM	LIC 241C	Aberdeen	ID 353.3	317.80	240.5	77.3

-----  
All separation margins include rounding

## Section 73.1675 Compliance

### **Predicted Coverage Map**

Map (**Figure 1**) illustrates that the 60 dBu F(50,50) contour of the proposed auxiliary facility is completely enclosed within the 60 dBu F(50,50) contour of the licensed facility.



60 dBu Contour Comparison

FIGURE 1

## Antenna Technical Data

Emissions from the proposed auxiliary facility will be combined into the currently licensed auxiliary antenna of KKLTV, which is an ERI model SHPX-2AE-HW two bay antenna with 0.5 wavelength spacing.

## **Environmental Protection**

The proposed facility will be built at an existing communications facility. This site is not a “Historic Place” as described in section 1.1307(a) (4). Therefore, this application is excluded from the preparation of an “Environmental Assessment” pursuant to Section 1.1306 Note 1.

In order to comply with OET 65, Broadway Media LS, LLC (Applicant) carefully investigated RF sources on the site, and learned that the site is not straightforward. There are multiple towers and multiple radiators on each tower. The proposed KXRK AUX facility is to be built on a tower that, according to FCC records is within 200 meters of a number of broadcast facilities and applications:

<b>Call</b>	<b>File #</b>	<b>FIN</b>	<b>City of License</b>	<b>Licensee</b>
KUER-FM	BLED-20121009ADB	69171	Salt Lake City, UT	University of Utah
KRCL	BLED-20030310AOH	37766	Salt Lake City, UT	Listeners Community Radio
KUUU	BLH-20080819AAM	37876	South Jordan, UT	Broadway Media LS
KUBL-FM	BLH-20021203ACG	11238	Salt Lake City, UT	Radio License Holding CBC
KODJ	BLH-20061005ADE	48916	Salt Lake City, UT	Citicasters Licenses
KXRK	BLH-20160119ADW	406	Provo, UT	Broadway Media, LS
KZHT	BLH-20030507ACH	63820	Salt Lake City, UT	CC Licenses
KBZN	BLH- 19781208AG	8690	Ogden, UT	Capitol Broadcasting
K257GJ	BLFT-20171213AAQ	6544	Salt Lake City, UT	Citicasters Licenses
KSFI	BMLH- 20021113AAK	60452	Salt Lake City, UT	Bonneville International
KSFI	BLH-19800728AC	60452	Salt Lake City, UT	Bonneville International
KBER	BMLH-20021203AAC	10779	Ogden, UT	Radio License Holdings CBC
KHTB	BLH-20030508AAI	2444	Ogen, UT	Radio License Holdings CBC
KSL-FM	BLH-20021113AAL	54156	Midvale, UT	Bonneville International
KRSP-FM	BLH-20021113AAM	27462	Salt Lake City, UT	Bonneville International
KSOP-FM	BLH-20040205AAJ	35629	Salt Lake City, UT	KSOP, INC
K284AY	BPFT-20160617AAL	156436	Tooele, UT	Broadway Media LS
KUDD	BLH-20151130CJH	59034	American Fork, UT	Broadway Media LS
K288GY	BLFT-20171201AME	13485	Tooele, UT	Broadway Media LS
KNRS-FM	BLH-20151013AGZ	69555	Centerville, UT	Citicasters Licenses
KAZ-FM	BLH-20021125AAT	63536	Spanish Fork, UT	Citicasters Licenses

Because of this large number of facilities and the complexities of calculations with multiple radiators on multiple towers, Applicant believes that theoretical calculations would give inaccurate results at best.

Accordingly, Applicant respectfully requests that the Commission grant the instant Construction Permit with the condition that the Applicant make RF measurements before constructing the facility and submit the results of those measurements, along with the theoretical change caused by the addition of its antenna, prior to Commission grant of Program Test Authority.

If the results of the measurements and subsequent calculations reveal that there are areas that would exceed the requirements of OET 65 for controlled or uncontrolled access, Applicant will work with the site owners and other broadcasters to erect fencing and/or signage to fully comply with OET 65.

Further, after construction of the instant facility, Applicant will continue to cooperate with other site users to reduce power or cease broadcasting as necessary to protect workers and others having access to the site from excessive levels of RF Radiation.