

December 2019

**Engineering Exhibit – Amendment to Minor Modification**

**KBCC FM – Tracy, CA  
Facility ID# 176022**

Coordinates:	37 42 34.36 N, 121 28 40.82 W (NAD 83)
Site elevation:	43.1 meters
AGL:	11.4 meters
AMSL:	54.5 meters
Power:	240 watts ERP
<b>HAAT:</b>	<b>-81 meters</b>
<b>Terrain:</b>	<b>FCC 30 second terrain database</b>

**Description:**

Amendment to minor modification for power increase to 240 watts ERP providing more detail for the 100 dBu f (50,10) interference contour.

For consistency, calculations are updated and matched to the original HAAT values listed in authorizations for co-channel and adjacent stations using FCC 30 second terrain database.

Calculations generated with VSoft FM Commander and Probe 4 software are cross-referenced with the Distance, ERP, and HAAT calculators at the FCC.gov website. The data and mappings posted below show KBCC's 60 dBu contour at 54.5 meters AMSL and -81 m HAAT remaining clear of the 54 dBu f (50,10) contour of first-adjacent station KLRS, as well as the 40 f(50,10) contour of co-channel station KBES.

At -81 meters HAAT, KBCC's 100 dBu f(50,10) signal at 1.1km radius is also confirmed as sufficiently clearing KYCC's 60 dBu f(50,50) contour along critical radials at 211° & 212° degrees. Parameters used for distance, propagation, and HAAT calculations from FCC 30 second terrain database are provided below to confirm ERP values along each radial of KYCC's directional antenna, with no overlap.

Per §73.509, proposed modification complies with contour overlap requirements with reserved-band facilities using methodology outlined in §73.313(c).

## CHANNEL STUDY

REFERENCE	KBCC - Tracy, CA	DISPLAY DATES
37 42 34.36 N.	CLASS = A	DATA 12-08-19
121 28 40.82 W.	Current Spacings to 3rd Adj.	SEARCH 12-13-19
----- Channel 208 - 89.5 MHz -----		

Call	Channel	Location	Azi	Dist	FCC	Margin
KBES	LIC	208A	Ceres	CA	106.1	47.84 114.5 -66.7
KSMC	LIC-D	208A	Moraga	CA	284.8	57.62 114.5 -56.9
KLRS	LIC-D	209B	Lodi	CA	357.8	62.43 112.5 -50.1
KYCC	LIC-D	211B	Stockton	CA	31.7	32.50 68.5 -36.0
KZCT	LIC-D	208A	Vallejo	CA	308.4	79.62 114.5 -34.9
KZCT	CP -D	208A	Vallejo	CA	303.1	80.30 114.5 -34.2
KCAI	APP	207A	Linden	CA	56.8	38.61 71.5 -32.9
KPOO	LIC-D	208A	San Francisco	CA	276.7	83.13 114.5 -31.4
KOHL	LIC-D	207A	Fremont	CA	243.1	42.26 71.5 -29.2
KFJC	LIC	209B1	Los Altos	CA	233.8	72.90 95.5 -22.6
KCAI	LIC-D	207B1	Linden	CA	55.2	80.31 95.5 -15.2
KNVM	LIC-D	209B	Prunedale	CA	181.2	105.83 112.5 -6.7
KXPR	LIC-D	205B	Sacramento	CA	357.9	62.64 68.5 -5.9
KMTG	LIC-D	207A	San Jose	CA	211.1	65.85 71.5 -5.7
KPFB	LIC-D	207A	Berkeley	CA	284.8	72.29 71.5 0.8
KCJH	LIC-D	206B1	Livingston	CA	104.4	57.47 47.5 10.0

-----  
All separation margins include rounding  
-----

### Station List

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power	HAAT (m)
Facility ID		File Number			Licensee				
KBCCmod 176022	LIC	208 MOD	M	A	Tracy Peace And Justice Network OfSan Joaquin	CA	No	0.24	-81.0
KYCC 63464	LIC	211 BLED20080930ATZ	M	B	Stockton Your Christian Companion Network, Inc.	CA	Yes	41.0	107.0
KLRS 89079	LIC	209 BLED20081103AAE	M	B	Lodi Educational Media Foundation	CA	Yes	2.5	487.0
KBES 4938	LIC	208 BLED20100901ACT	M	A	Ceres Bet Nahrain, Inc.	CA	No	0.15	40.0

## KBCC to KLRS – First Adjacent Channel

KBCC.C

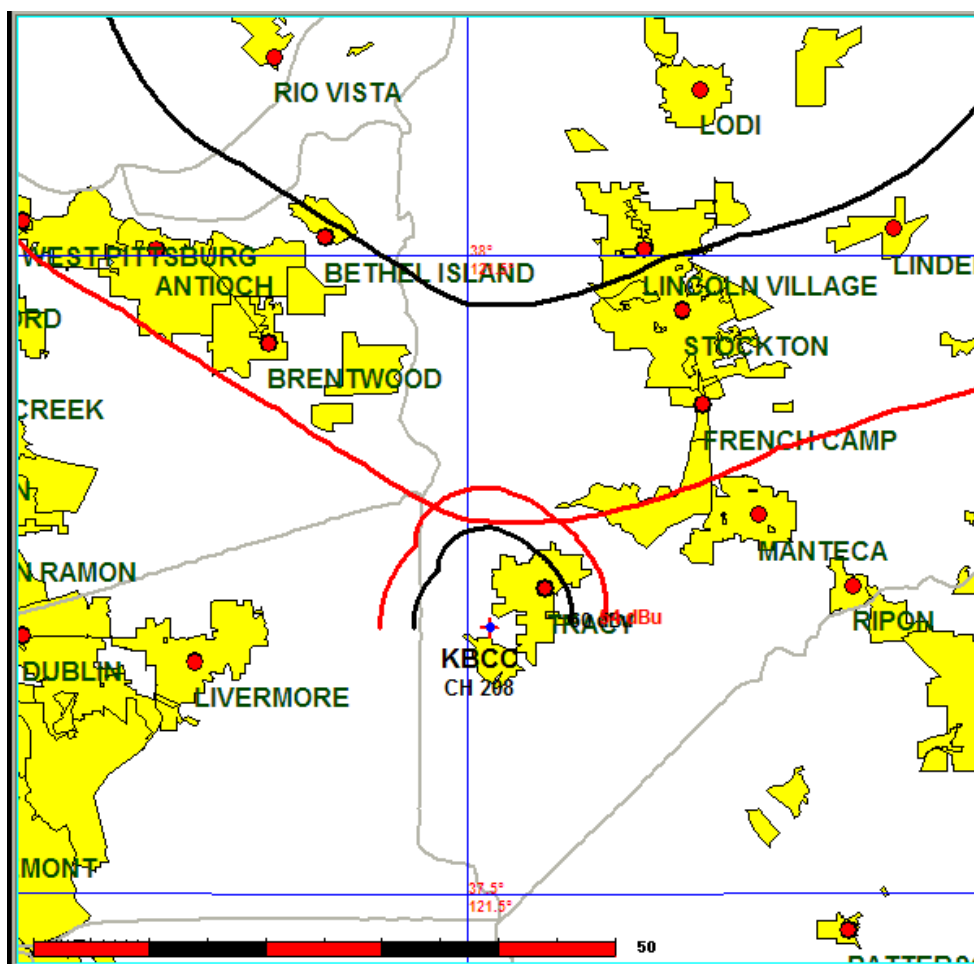
Channel = 208A  
Max ERP = 0.24 kW  
RCAMSL = 54.5 m  
HAAT = -81.0 m  
N. Lat. 37 42 34.36  
W. Lng. 121 28 40.82

Protected  
60 dBu

KLRS BLED20081103AAE

Channel = 209B  
Max ERP = 2.5 kW  
RCAMSL = 489 m  
HAAT = 487.0 m  
N. Lat. 38 16 17.70  
W. Lng. 121 30 21.80

Interfering  
54 dBu



## KBCC to KBES - Cochannel

KBCC.C

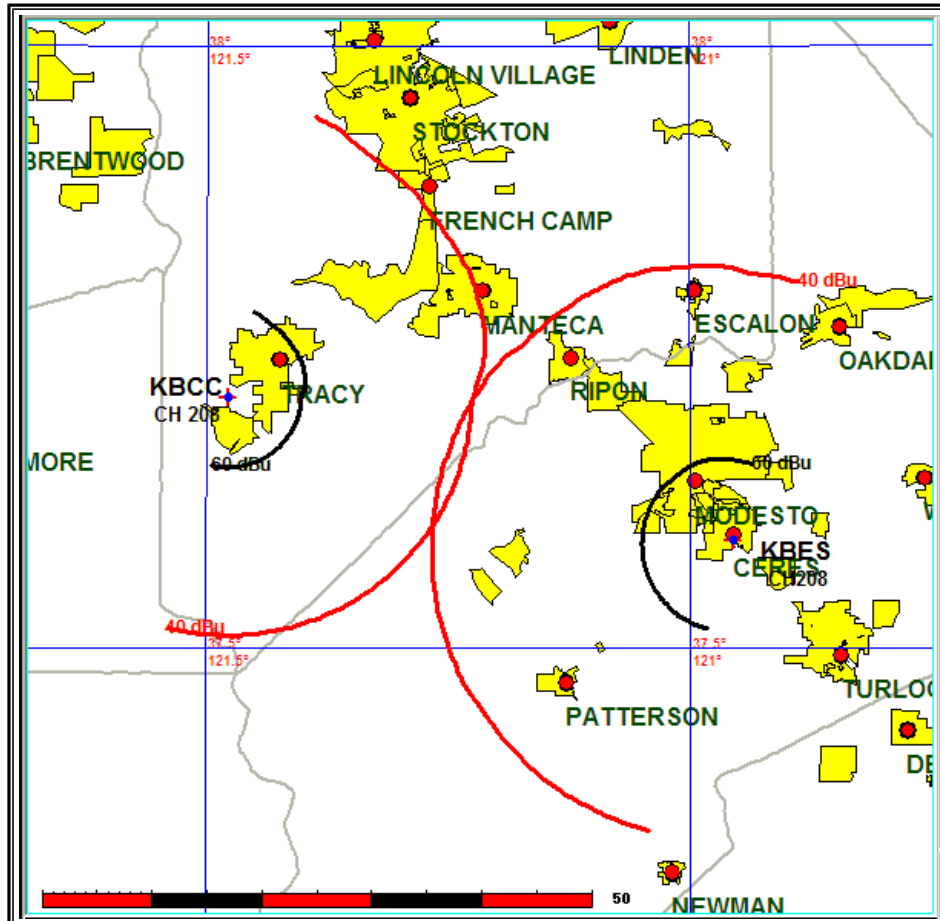
Channel = 208A  
Max ERP = 0.24 kW  
RCAMSL = 54.5 m  
HAAT = -81.0 m  
N. Lat. 37 42 34.36  
W. Lng. 121 28 40.82

Protected  
60 dBu

KBES BLED20100901ACT

Channel = 208A  
Max ERP = 0.15 kW  
RCAMSL = 72 m  
HAAT = 40.0 m  
N. Lat. 37 35 20.76  
W. Lng. 120 57 26.75

Interfering  
40 dBu



### KBCC to KYCC - 3<sup>rd</sup> Adjacent Channel

KBCC.C

Channel = 208A  
Max ERP = 0.24 kW  
RCAMSL = 54.5 m  
HAAT = -81.0 m  
N. Lat. 37 42 34.36  
W. Lng. 121 28 40.82

**Protected**

\* 60 f(50,50) dBu

KYCC BLED20080930ATZ

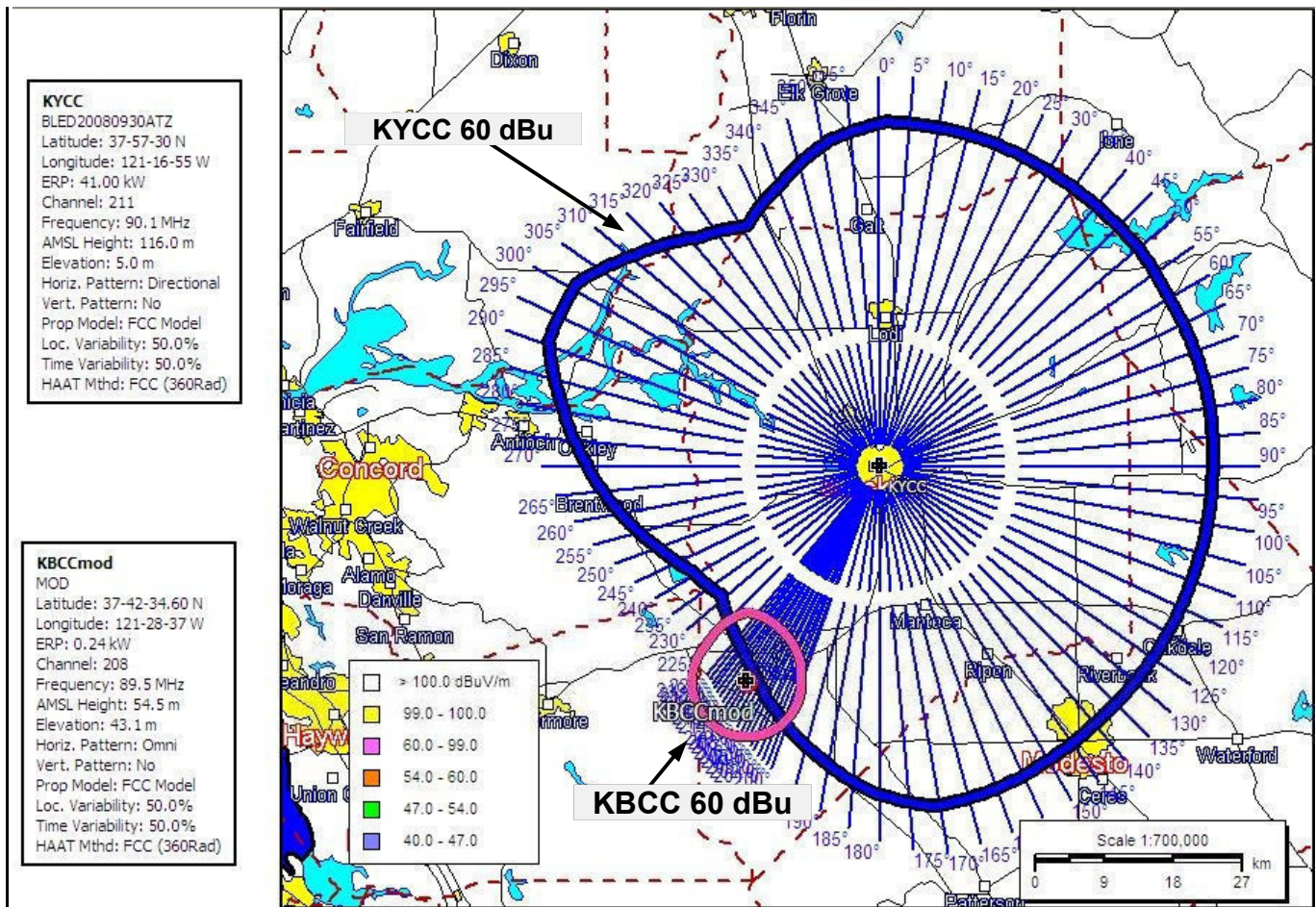
Channel = 211B  
Max ERP = 41.0 kW  
RCAMSL = 116 m  
HAAT = 107.0 m  
N. Lat. 37 57 29.72  
W. Lng. 121 16 58.81

**Protected**

\* 60 f(50,50) dBu

\* Note: 60 dBu contours visible with Map scale at 1:700,000.

(Following pages detail 100 dBu f(50,10) contour as outside of KYCC's 60 dBu)





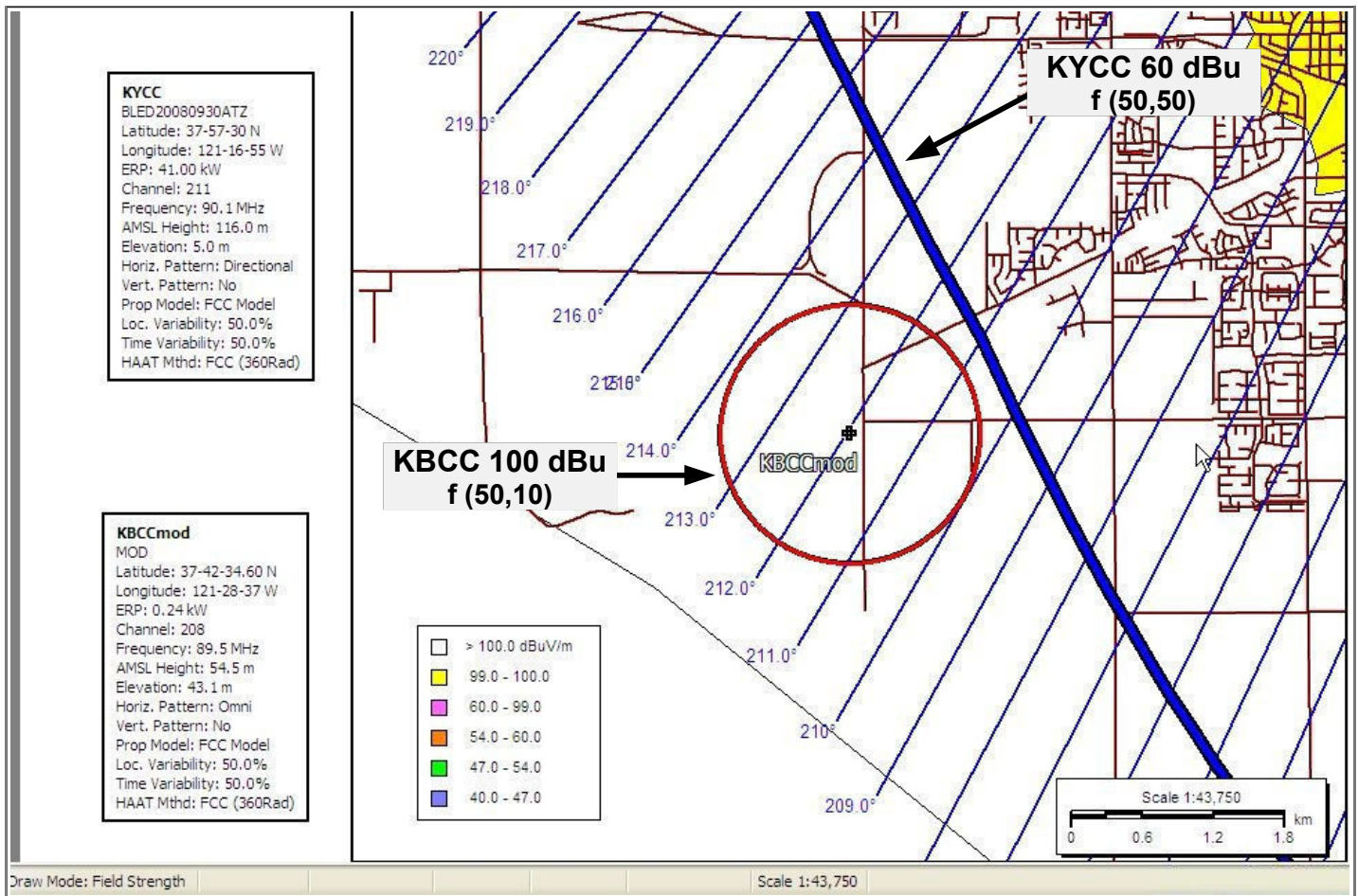
## KBCC to KYCC - 3<sup>rd</sup> Adjacent Channel

### **KBCC.C**

Channel = 208A  
Max ERP = 0.24 kW  
RCAMSL = 54.5 m  
HAAT = -81.0 m  
N. Lat. 37 42 34.36  
W. Lng. 121 28 40.82  
Interfering  
**100 f(50,10) dBu**

### **KYCC BLED20080930ATZ**

Channel = 211B  
Max ERP = 41.0 kW  
RCAMSL = 116 m  
HAAT = 107.0 m  
N. Lat. 37 57 29.72  
W. Lng. 121 16 58.81  
**Protected**  
**60 f(50,50) dBu**



### Contour Area Coverage Report

Reference Area: KBCCmod (208): FCC F(50-10) 100.00 dBu (FCC HAAT)

Contours that completely cover the reference area (1):

KBCCmod (208) : FCC F(50-50) 60.00 dBu (FCC HAAT)

Contours that do not cover any of the reference area (1):

KYCC (211) : FCC F(50-50) 60.00 dBu (FCC HAAT)

## **Environmental Protection Act / NIER Analysis**

Modification of FM facility proposes a single-bay circular-polarized antenna at 11.4 meters above ground level operating at 240 watts ERP. Using the FM Model application with the "EPA Type 1" setting to approximate worst-case exposure, FM Model predicted a maximum peak of  $108.36 \mu\text{W}/\text{cm}^2$ , at 3.3 meters below center of radiation. This represents 54.18 % of FCC Maximum Permissible Exposure (MPE) of  $200 \mu\text{W}/\text{cm}^2$  for uncontrolled environments. Level fall to  $55.4 \mu\text{W}/\text{cm}^2$  (27.7 % of MPE) at 13.3 meters, and continues dissipating further from the tower.

Site is near a greenhouse used for day parking by crews going out on landscaping jobs. Immediate area is not accessible to general public or other unauthorized persons, further reducing potential exposure. Antenna mounted on a pole is only accessible using a tall extension ladder. In an abundance of caution, a sign will be posted indicating potential RF exposure hazards. Facility will be powered down before any work is performed.

---

### **Exhibits:**

- FM Model RF calculations
- NADCON NAD 27 -> NAD 83 conversion
- TOWAIR FAA clearance
- HAAT calculations: - 81 meters (FCC 30 second terrain database)

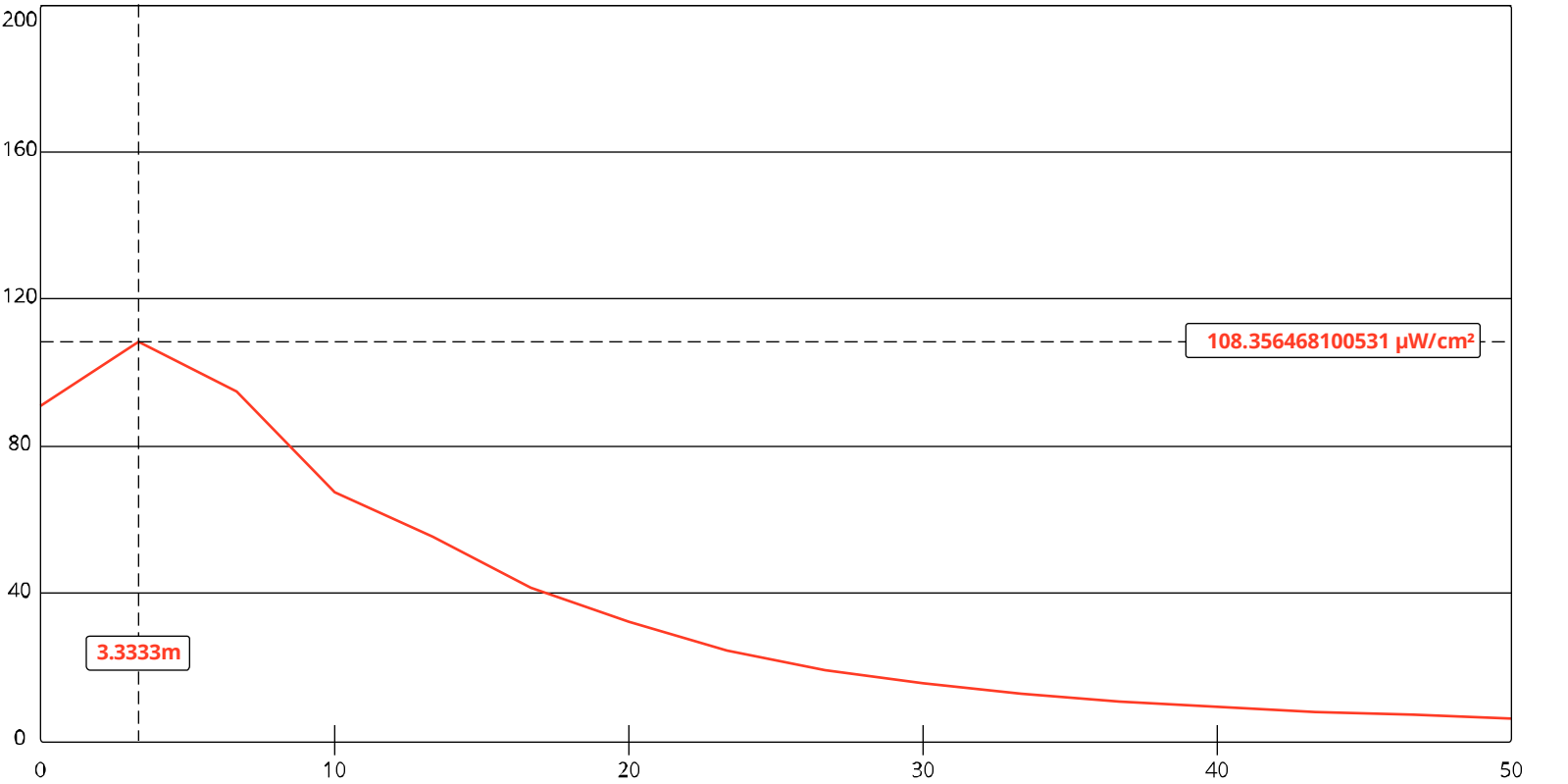
## **Supplemental Exhibit - Details on 100 dBu vs 60 dBu 3<sup>rd</sup> Adjacent contour**

- KYCC - FCC Engineering Authorization
- Calculations – HAAT, Distance, ERP, and Field Strength at critical radials (KYCC 211° - 213° degrees -> to KBCC )
- KYCC Directional Antenna - Relative Field at each azimuth (360° degrees)
- KYCC HAAT calculations: 107 meters (FCC 30 second terrain database)



# FM Model

The FM Model calculator determines the potential exposure from radiofrequency (RF) electromagnetic fields produced by FM broadcast station antennas at ground level. The FM Model software was originally developed by the FCC in 1997 as a standalone executable program and this improved version provides more precise predictions and runs via a JavaScript enabled web browser. The FM Model is originally based on measured data [published in 1985 by the EPA](http://nepis.epa.gov/Exe/ZyNET.exe/2000ED2W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A\zyfiles\Index%20Data\81thru85\Txt\00000003\2000ED2W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h|-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=p|f&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL) (<http://nepis.epa.gov/Exe/ZyNET.exe/2000ED2W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A\zyfiles\Index%20Data\81thru85\Txt\00000003\2000ED2W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h|-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=p|f&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>). [▼ Show More....](#)



Channel Selection	Channel 250 (97.9 MHz)		
Antenna Type +	EPA Type 1: Ring-and-Stub or "Other"		
Height (m)	11.4	Distance (m)	50
ERP-H (W)	240	ERP-V (W)	240
Num of Elements	1	Element Spacing (λ)	0
Num of Points	15	Apply	



Hide Tabular Results -

Distance (m)	Power Density ( $\mu\text{W}/\text{cm}^2$ )
0	90.7
3.3333	108.4
6.6667	94.8
10	67.3
13.3333	55.4
16.6667	41.4
20	32.1
23.3333	24.4
26.6667	19.1
30	15.3
33.3333	12.5
36.6667	10.5
40	9.0
43.3333	7.8
46.6667	6.8
50	6.0

Go to the Top of the Page

**Bureau/Office:**

Engineering & Technology (<https://www.fcc.gov/engineering-technology>)

**Updated:**

Friday, June 8, 2018

# Output from NADCON for station

North American Datum Conversion

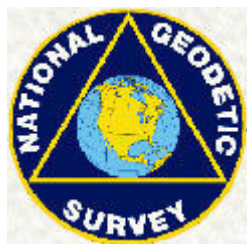
NAD 27 to NAD 83

NADCON Program Version 2.11

=====

Transformation #: 1                      Region: Conus

	Latitude	Longitude
NAD 27 datum values:	37 42 34.61000	121 28 37.02000
NAD 83 datum values:	37 42 34.35707	121 28 40.82374
NAD 83 - NAD 27 shift values:	-0.25293	3.80374 (secs.)
	-7.798	93.168 (meters)
Magnitude of total shift:		93.494 (meters)



[NGS HOME PAGE](#)



## Antenna Structure Registration

[FCC](#) > [WTB](#) > [ASR](#) > [Online Systems](#) > TOWAIR

[FCC Site Map](#)

### TOWAIR Determination Results

[? HELP](#)
[New Search](#) [Printable Page](#)

A routine check of the coordinates, heights, and structure type you provided indicates that this structure does not require registration.

#### \*\*\* NOTICE \*\*\*

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

#### DETERMINATION Results

**PASS SLOPE(100:1)NO FAA REQ - 3360.0 Meters (11023.4 Feet)away & below slope by 27.0 Meters (88.5799 Feet)**

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	37-41-26.00N	121-26-54.00W	TRACY MUNI	SAN JOAQUIN TRACY, CA	52.6	1219.5

**PASS SLOPE(100:1)NO FAA REQ - 3478.0 Meters (11410.6 Feet)away & below slope by 28.0 Meters (91.8599 Feet)**

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	37-41-28.00N	121-26-46.00W	TRACY MUNI	SAN JOAQUIN TRACY, CA	52.6	1219.5

#### Your Specifications

##### NAD83 Coordinates

Latitude	37-42-34.4 north
Longitude	121-28-40.8 west

##### Measurements (Meters)

Overall Structure Height (AGL)	16
Support Structure Height (AGL)	0
Site Elevation (AMSL)	43.1

##### Structure Type

POLE - Any type of Pole

## Antenna Height Above Average Terrain Calculations -- Results

### Input Data

Latitude **37° 42' 34.61" North**

Longitude **121° 28' 37.02" West (NAD 27)**

These coordinates convert to NAD 83 coordinates of

37° 42' 34.36", North, 121° 28' 40.82" West (NAD 83).

Height of antenna radiation center above mean sea level: **54.5 meters AMSL**

Number of Evenly Spaced Radials = **360** 0° is referenced to True North

### Results

Calculated HAAT = **-81 meters**

Antenna Height Above Average Terrain calculated  
using FCC 30 second terrain database (continental USA only)

### Individual "Radial HAAT" Values, in meters

0°	47.4 m	120°	11.3 m	240°	-338.1 m
1°	47.4 m	121°	10.0 m	241°	-335.7 m
2°	47.2 m	122°	8.6 m	242°	-335.9 m
3°	47.1 m	123°	7.3 m	243°	-339.8 m
4°	46.9 m	124°	6.2 m	244°	-344.6 m
5°	46.3 m	125°	5.1 m	245°	-347.8 m
6°	45.6 m	126°	3.9 m	246°	-348.2 m
7°	45.0 m	127°	2.4 m	247°	-343.8 m
8°	44.4 m	128°	0.8 m	248°	-334.8 m
9°	44.1 m	129°	-0.9 m	249°	-322.7 m
10°	43.8 m	130°	-2.8 m	250°	-309.5 m
11°	43.5 m	131°	-5.2 m	251°	-297.8 m
12°	43.2 m	132°	-8.1 m	252°	-287.9 m
13°	43.0 m	133°	-11.2 m	253°	-278.6 m
14°	42.9 m	134°	-14.4 m	254°	-269.3 m
15°	42.9 m	135°	-17.8 m	255°	-259.3 m
16°	42.6 m	136°	-21.5 m	256°	-248.9 m
17°	42.0 m	137°	-25.2 m	257°	-239.9 m
18°	41.3 m	138°	-28.7 m	258°	-230.7 m
19°	41.0 m	139°	-32.5 m	259°	-221.8 m
20°	40.9 m	140°	-36.9 m	260°	-213.4 m
21°	41.0 m	141°	-41.8 m	261°	-203.5 m
22°	41.1 m	142°	-47.1 m	262°	-194.1 m
23°	41.1 m	143°	-52.7 m	263°	-185.4 m
24°	41.1 m	144°	-58.7 m	264°	-178.4 m
25°	41.1 m	145°	-64.2 m	265°	-173.3 m
26°	40.9 m	146°	-68.3 m	266°	-170.1 m
27°	40.6 m	147°	-71.7 m	267°	-166.8 m
28°	40.3 m	148°	-75.8 m	268°	-163.8 m
29°	40.0 m	149°	-81.2 m	269°	-161.1 m
30°	39.6 m	150°	-87.0 m	270°	-157.3 m
31°	39.2 m	151°	-92.7 m	271°	-152.0 m
32°	38.7 m	152°	-98.9 m	272°	-146.6 m
33°	38.4 m	153°	-105.8 m	273°	-141.3 m
34°	38.1 m	154°	-112.4 m	274°	-134.5 m
35°	38.0 m	155°	-118.2 m	275°	-128.0 m
36°	37.8 m	156°	-124.1 m	276°	-121.4 m
37°	37.7 m	157°	-130.6 m	277°	-115.8 m
38°	37.6 m	158°	-136.0 m	278°	-113.0 m
39°	37.5 m	159°	-139.0 m	279°	-109.0 m
40°	37.6 m	160°	-141.9 m	280°	-104.5 m
41°	37.7 m	161°	-145.1 m	281°	-97.7 m
42°	37.7 m	162°	-148.0 m	282°	-90.7 m
43°	37.7 m	163°	-151.8 m	283°	-85.2 m

44°	37.6 m	164°	-157.3 m	284°	-81.5 m
45°	37.6 m	165°	-164.0 m	285°	-79.9 m
46°	37.7 m	166°	-171.8 m	286°	-78.6 m
47°	37.8 m	167°	-183.0 m	287°	-77.2 m
48°	37.9 m	168°	-195.3 m	288°	-75.6 m
49°	38.0 m	169°	-204.1 m	289°	-74.5 m
50°	37.8 m	170°	-210.1 m	290°	-73.0 m
51°	37.4 m	171°	-212.7 m	291°	-69.9 m
52°	36.7 m	172°	-219.0 m	292°	-65.8 m
53°	35.9 m	173°	-225.9 m	293°	-61.4 m
54°	35.2 m	174°	-230.1 m	294°	-57.1 m
55°	34.8 m	175°	-231.3 m	295°	-52.5 m
56°	34.5 m	176°	-234.1 m	296°	-46.5 m
57°	34.4 m	177°	-235.9 m	297°	-39.8 m
58°	34.4 m	178°	-236.6 m	298°	-33.4 m
59°	34.4 m	179°	-236.0 m	299°	-28.1 m
60°	34.4 m	180°	-237.4 m	300°	-22.5 m
61°	34.4 m	181°	-240.1 m	301°	-16.9 m
62°	34.4 m	182°	-242.7 m	302°	-11.8 m
63°	34.3 m	183°	-245.0 m	303°	-7.9 m
64°	34.3 m	184°	-246.5 m	304°	-5.1 m
65°	34.2 m	185°	-249.8 m	305°	-2.8 m
66°	34.1 m	186°	-257.4 m	306°	-0.5 m
67°	33.9 m	187°	-267.2 m	307°	2.2 m
68°	33.7 m	188°	-276.2 m	308°	5.6 m
69°	33.5 m	189°	-282.1 m	309°	9.2 m
70°	33.3 m	190°	-286.2 m	310°	12.6 m
71°	33.1 m	191°	-290.6 m	311°	15.7 m
72°	33.0 m	192°	-296.1 m	312°	18.5 m
73°	32.8 m	193°	-302.1 m	313°	21.0 m
74°	32.7 m	194°	-309.1 m	314°	23.1 m
75°	32.7 m	195°	-312.4 m	315°	24.8 m
76°	32.6 m	196°	-316.9 m	316°	26.5 m
77°	32.4 m	197°	-320.7 m	317°	28.3 m
78°	32.1 m	198°	-323.9 m	318°	29.8 m
79°	31.7 m	199°	-324.1 m	319°	31.1 m
80°	31.3 m	200°	-322.7 m	320°	32.2 m
81°	31.0 m	201°	-323.0 m	321°	33.3 m
82°	30.8 m	202°	-323.8 m	322°	34.3 m
83°	30.6 m	203°	-324.1 m	323°	35.4 m
84°	30.5 m	204°	-323.5 m	324°	36.3 m
85°	30.4 m	205°	-323.7 m	325°	37.2 m
86°	30.2 m	206°	-326.4 m	326°	38.0 m
87°	30.1 m	207°	-330.3 m	327°	38.8 m
88°	30.0 m	208°	-332.8 m	328°	39.6 m
89°	29.8 m	209°	-334.3 m	329°	40.2 m
90°	29.7 m	210°	-337.8 m	330°	40.6 m
91°	29.5 m	211°	-343.5 m	331°	41.0 m
92°	29.4 m	212°	-347.7 m	332°	41.4 m
93°	29.2 m	213°	-348.8 m	333°	41.8 m
94°	29.0 m	214°	-346.9 m	334°	42.4 m
95°	28.8 m	215°	-342.1 m	335°	43.1 m
96°	28.4 m	216°	-334.0 m	336°	43.6 m
97°	28.1 m	217°	-326.9 m	337°	44.0 m
98°	27.8 m	218°	-323.2 m	338°	44.4 m
99°	27.5 m	219°	-322.3 m	339°	44.7 m
100°	27.0 m	220°	-323.2 m	340°	44.9 m
101°	26.4 m	221°	-324.6 m	341°	45.2 m
102°	25.7 m	222°	-325.4 m	342°	45.5 m
103°	25.0 m	223°	-326.0 m	343°	45.8 m
104°	24.3 m	224°	-326.0 m	344°	46.0 m
105°	23.7 m	225°	-324.9 m	345°	46.2 m
106°	23.1 m	226°	-323.7 m	346°	46.3 m
107°	22.4 m	227°	-325.1 m	347°	46.4 m
108°	21.6 m	228°	-328.2 m	348°	46.4 m
109°	21.1 m	229°	-328.4 m	349°	46.5 m
110°	20.6 m	230°	-323.6 m	350°	46.7 m
111°	20.2 m	231°	-317.1 m	351°	46.9 m
112°	19.8 m	232°	-312.7 m	352°	47.0 m
113°	19.4 m	233°	-312.6 m	353°	47.1 m
114°	18.6 m	234°	-317.1 m	354°	47.3 m
115°	17.4 m	235°	-324.4 m	355°	47.4 m
116°	15.9 m	236°	-331.9 m	356°	47.4 m
117°	14.5 m	237°	-337.5 m	357°	47.4 m
118°	13.3 m	238°	-340.3 m	358°	47.4 m
119°	12.4 m	239°	-340.3 m	359°	47.4 m