

Exhibit 1. Request for Waiver of 47 C.F.R Section 73.509

KAIH, Lake Havasu City, AZ (FIN: 93353)

November 30, 2020

Advance Ministries, Inc. D/B/A New Life Christian School (“AMI”) requests a Waiver of 47 C.F.R Section 73.509 in order to benefit the public interest by providing an increased ERP and service area for FM station KAIH.

This proposal will not cause any interference to any existing stations, authorizations, applications or allotments. This proposal will result in received 3rd adjacent overlap from license BLED-20131202ADC for FM station KAWP, Parker, AZ (FIN: 174119) licensed to Arizona Western College on channel 205A.

This proposal will not cause interference to KAWP. The interfering 100dBμ F(50,10) contour of KAIH will not overlap the protected 60dBμ F(50,50) contour of KAWP. However, the proposed protected contour of KAIH will receive overlap from KAWP’s license BLED-20131202ADC. Please refer to the Contour Map on page of this exhibit.

The area of overlap received described above will be approximately 4.0 km², which represents 0.02% of the total area of KAIH’s proposed 60 dBμ F(50,50) which is calculated to be 16,613.2 km².

Without the waiver, KAIH would be restricted to .450 kW in order to prevent 60 dBμ F(50,50) contour overlap of the proposal with the 100 dBμ F(50,10) contour of KAWP’s license BLED-20131202ADC. At ERP 7.8 kW the 60 dBμ F(50,50) coverage for KAIH would be 6,165.5km² and would provide 60 dBμ F(50,50) service to 54,107 persons. Please refer to the contour map on page 3 of this exhibit.

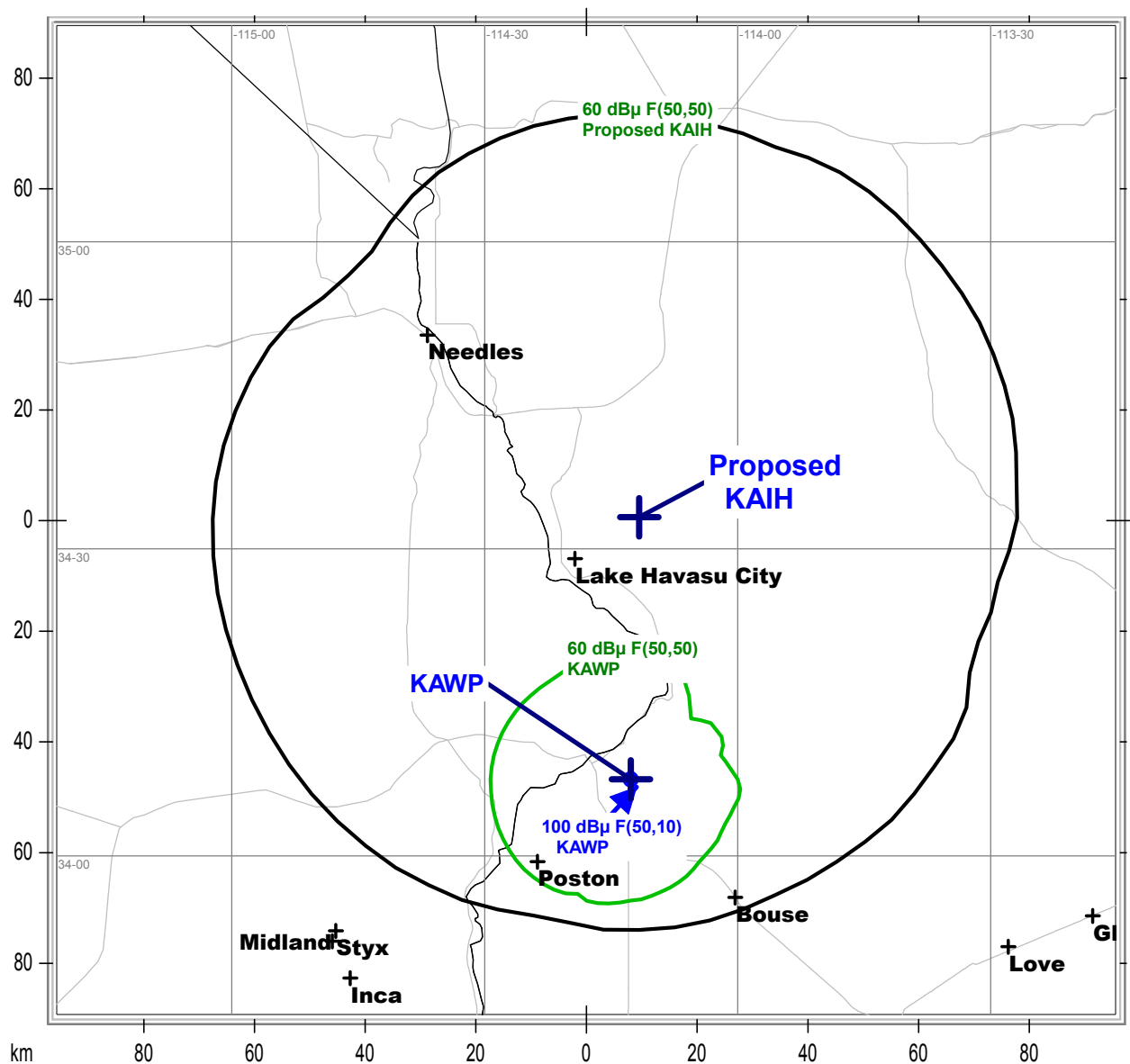
The grant of this waiver request will allow KAIH to increase its overall coverage area by 10,447 km² which represents an increase of 169.5%. This proposal will provide service to an additional 42,636 persons which represents an increase in population of 78.8%.

This requested waiver is similar to the waiver requested by the licensees of WCPE(FM) in *Educational Information Corporation*, 6 FCC Red 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimis* overlap “received”. In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted the waiver request. This proposal fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission’s rules as it pertains to overlap received.¹

Significant service will be maintained and enhanced by the proposed expansion of KAIH, and the overlap area is very small and well within the Commission’s waiver policy. Clearly this benefit heavily outweighs the potential for interference in an area that constitutes less than 0.02% (total) of the station’s proposed service area. Accordingly AMI respectfully submits that a waiver of Section 73.509(a) of the Commission’s rules is justified in this instance and will be a benefit to the public interest.

¹ AMI wishes to emphasize that this request is not similar to the second waiver request made by WCPE in *Educational Information Corporation*, 1997 FCC LEXIS 2636 (may 20, 1997). Unlike here, WCPE was seeking a waiver of overlap “caused” in that second case.

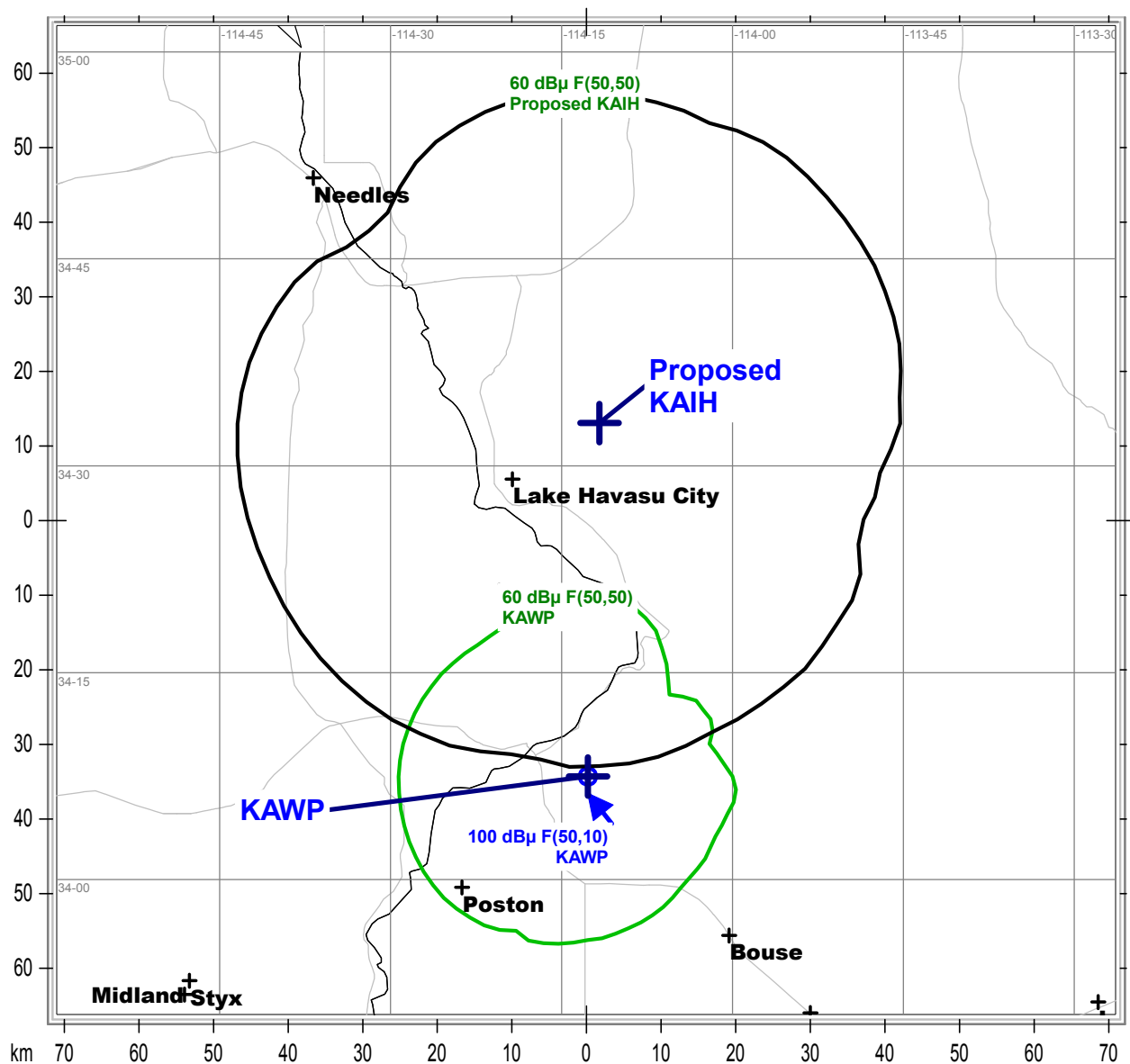
Proposed KAIH With Raleigh Waiver



AZ023C, 38m AGL, 840m HAAT, 7.8 kW, 208C0, BKG77-4(1)

State Borders Highways Lat/Lon Grid

Proposed KAIH Without Raleigh Waiver



AZ023C, 38m AGL, 840m HAAT, 450W, 208C0, BKG77-4(1)

State Borders Highways Lat/Lon Grid

Map Scale: 1:912325 1 cm = 9.12 km V/H Size: 132.73 x 142.13 km

Gene Wisniewski