

**April 2021**  
**FM Translator K288GG**  
**Anacortes, Washington Channel 286D**  
**Allocation Study**

**Allocation Study**

The attached spacing study shows the spacing between the proposed translator site and the location of cochannel and adjacent channel stations and proposals. This study was made with the Commission's Class A spacing requirements, and individual situations were examined to determine the lack of prohibited contour overlap per the requirements of §74.1204 of the Rules. The attached allocation study maps demonstrates compliance with the Commission's Rules for protection of FM broadcast stations and FM translators as outlined in §74.1204.

**Request for Waiver of §74.1235(d)(3)**

This application explicitly requests waiver of §74.1235(d)(3), which would limit the 34 dBu F(50,10) interfering contour from exceeding 60 kilometers in any direction. As is depicted on the attached map exhibit, the 34 dBu F(50,10) contour only exceeds 60 km over US land area. Even at that, the contour reaches only to 60.1 kilometers, at 55 to 58 degrees True; the extension is not perceptible on this map.

Since any Canadian stations are protected only over Canadian land area under the terms of the *Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service*, as amended in 1997 ("*Working Arrangement*"), and since the 34 dBu F(50,10) contour does not extend more than 60 km in any direction over Canadian land area, there is not believed to be any adverse effect upon Canadian allocations and assignments. The applicant therefore respectfully requests that §74.1235(d)(3) be waived to the extent necessary, and that this proposal be referred to Canadian authorities for concurrence.

**Compliance With the Working Arrangement**

The proposed facility is located within the US-Canada border zone. Analysis of this proposal has been made with regard to the *Working Arrangement*, to verify compliance with the cross-border interference protection requirements as set forth in that document.

***CKVX 285C Vancouver (CKKS-FM-2)***

As is demonstrated on the attached first-adjacent channel study map exhibit, the 48 dBu F(50,10) contour from the proposed facility does not overlap any Canadian land area. The *Working Arrangement* requires protection only to Canadian land area.

***Lake Cowichan 286A (Vacant)***

As is demonstrated on the attached 34 dBu contour map, the proposed 34 dBu F(50,10) contour does not overlap the 38 kilometer protected service radius of this vacant channel.

***Metchosin Etc. 286A (CBU-FM-2)***

According to the Commission's CDBS database, CBU-FM-2 is a "Specially negotiated short-spaced allotment LTD to .064kW ERP". This limitation comports with the CBU-FM-2 entry in the Canadian FM database, which lists an ERP of 64 watts at an antenna height of 370 meters AMSL. The attached allocation study map demonstrates that the 34 dBu F(50,10) contour from the proposed Anacortes translator only overlaps the CBU-FM-2 54 dBu F(50,50) contour over water areas. The *Working Arrangement* requires protection only to Canadian land area.

It should be noted that the Canadian islands in the vicinity where the two contours approach each other are unpopulated. (Discovery Island did house a lighthouse keeper until the lighthouse was automated in 1996.)

## SEARCH PARAMETERS

FM Database Date: 20210407

Channel: 286A 105.1 MHz  
 Latitude: 48 27 14.0 (NAD83)  
 Longitude: 122 37 33.0  
 Safety Zone: 50 km  
 Job Title: ANACORTES 286

Page 1

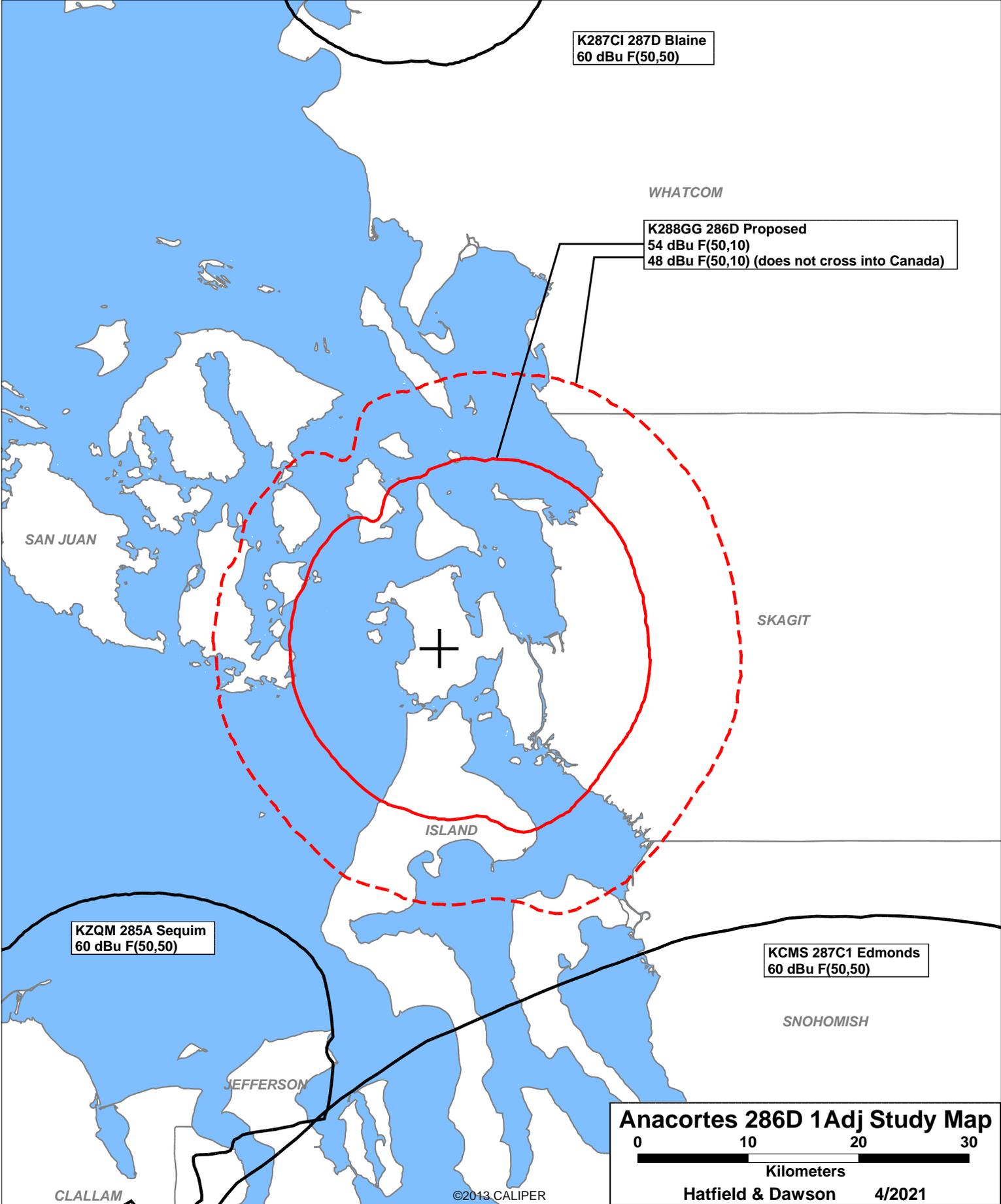
Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW ALC	OAK HARBOR WA		233A 94.5	0.000 0.0	48 17 35.4 122 38 35.6	184.1	17.92 7.92	10 CLOSE
K284BL LIC	BELLINGHAM WA	BLFT-20111207ALY	284D 104.7	0.012 0.0	DA 48 46 56.4 122 22 9.6	27.2	41.13 0.00	0 TRANS
KTFJ-LP LIC	BURLINGTON WA	BLL-20161031AAX	284L1 104.7	0.100 0.0	48 28 55.3 122 18 44.5	82.2	23.39 -5.61	29 SHORT
NEW ALC	VANCOUVER BC		285C 104.9	0.000 0.0	49 21 28.4 122 57 13.7	346.7	103.37 -78.63	182 SHORT
KHUH-LP LIC	SEATTLE WA	BLL-20170918AAC	285L1 104.9	0.015 78.0	47 36 47.3 122 18 18.4	165.6	96.50 40.50	56 CLEAR
CISQFM ALC	SQUAMISH BC		285A 104.9	0.000 0.0	49 42 30.4 123 8 3.7	345.3	144.38 46.38	98 CLEAR
ALC	VANCOUVER BC		285C 104.9	0.000 0.0	49 21 11.4 122 57 22.7	346.5	102.90 -79.10	182 SHORT
KZQM LIC	SEQUIM WA	BLH-20171221ACM	285A 104.9	6.000 22.0	DA 48 7 33.3 123 7 1.6	225.1	51.57 -20.43	72 SHORT
KAPY-LP LIC	DUVALL WA	BLL-20180501AAT	285L1 104.9	0.100 19.0	47 42 55.1 121 55 26.0	147.3	97.36 41.36	56 CLEAR
K288GG CP	ANACORTES WA	BPFT-20180327ACA	286D 105.1	0.014 0.0	DA 48 27 14.4 122 37 32.6	33.6	0.01 0.00	0 TRANS
CP	METCHOSIN ETC. BC		286A 105.1	0.000 0.0	48 24 8.3 123 34 24.7	265.7	70.37 -80.63	151 SHORT
ALC	LAKE COWICHAN BC		286A 105.1	0.000 0.0	48 50 31.3 124 4 17.8	292.7	114.95 -36.05	151 SHORT
ALC	OSOYOOS BC		286B 105.1	0.000 0.0	49 5 59.6 119 34 49.3	71.0	235.09 25.09	210 CLEAR
K287CI LIC	BLAINE WA	BLFT-20181206AAT	287D 105.3	0.045 0.0	DA 48 59 47.4 122 38 56.6	358.4	60.36 0.00	0 TRANS

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SEARCH PARAMETERS                               FM Database Date: 20210407
Channel: 286A 105.1 MHz                        Page 2
Latitude: 48 27 14.0 (NAD83)
Longitude: 122 37 33.0
Safety Zone: 50 km
Job Title: ANACORTES 286
    
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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KCMS	EDMONDS		287C1	54.000	47 32 39.4	159.0	108.26	133
LIC	WA	BLH-20010212AAE	105.3	385.0	122 6 30.4		-24.74	SHORT
K288GG	MOUNT VERNON		288D	0.043	DA 48 35 41.3	65.2	37.74	0
LIC	WA	BLFT-20110819AAK	105.5	0.0	122 9 39.5		0.00	TRANS
KZGI	SEDRO-WOLLEY		289A	0.700	48 31 17.7	75.8	31.03	31
LIC	WA	BLH-20170124ABU	105.7	-88.4	122 13 6.8	SS	0.03	CLOSE
CBUFM	VANCOUVER		289C	100.000	49 21 11.4	346.5	102.90	101
LIC	BC		105.7	567.0	122 57 22.7		1.90	CLOSE

==== END OF FM SPACING STUDY FOR CHANNEL 286 =====



K287C1 287D Blaine  
60 dBu F(50,50)

WHATCOM

K288GG 286D Proposed  
54 dBu F(50,10)  
48 dBu F(50,10) (does not cross into Canada)

SAN JUAN

SKAGIT

ISLAND

KZQM 285A Sequim  
60 dBu F(50,50)

KCMS 287C1 Edmonds  
60 dBu F(50,50)

SNOHOMISH

JEFFERSON

CLALLAM

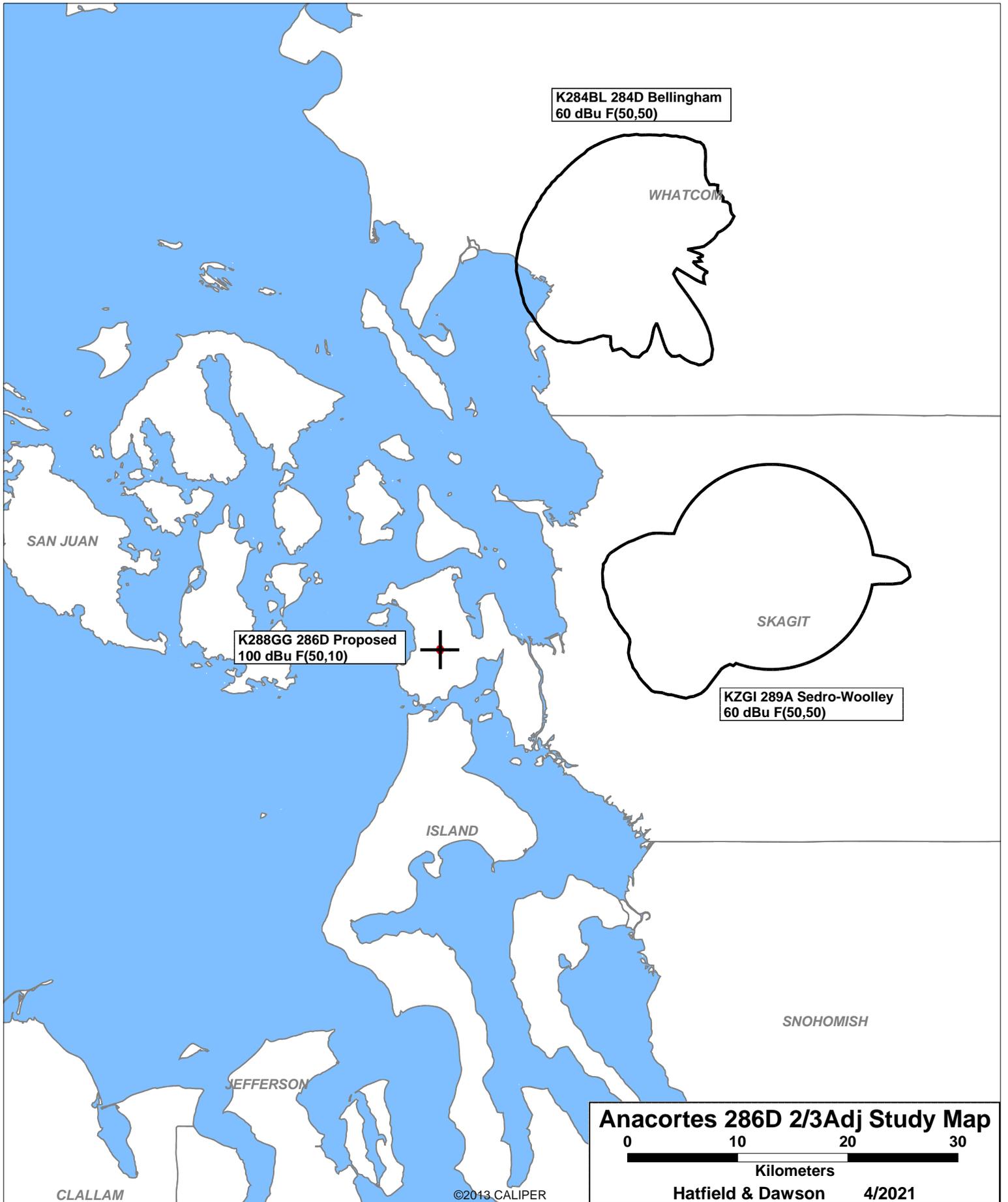
©2013 CALIPER

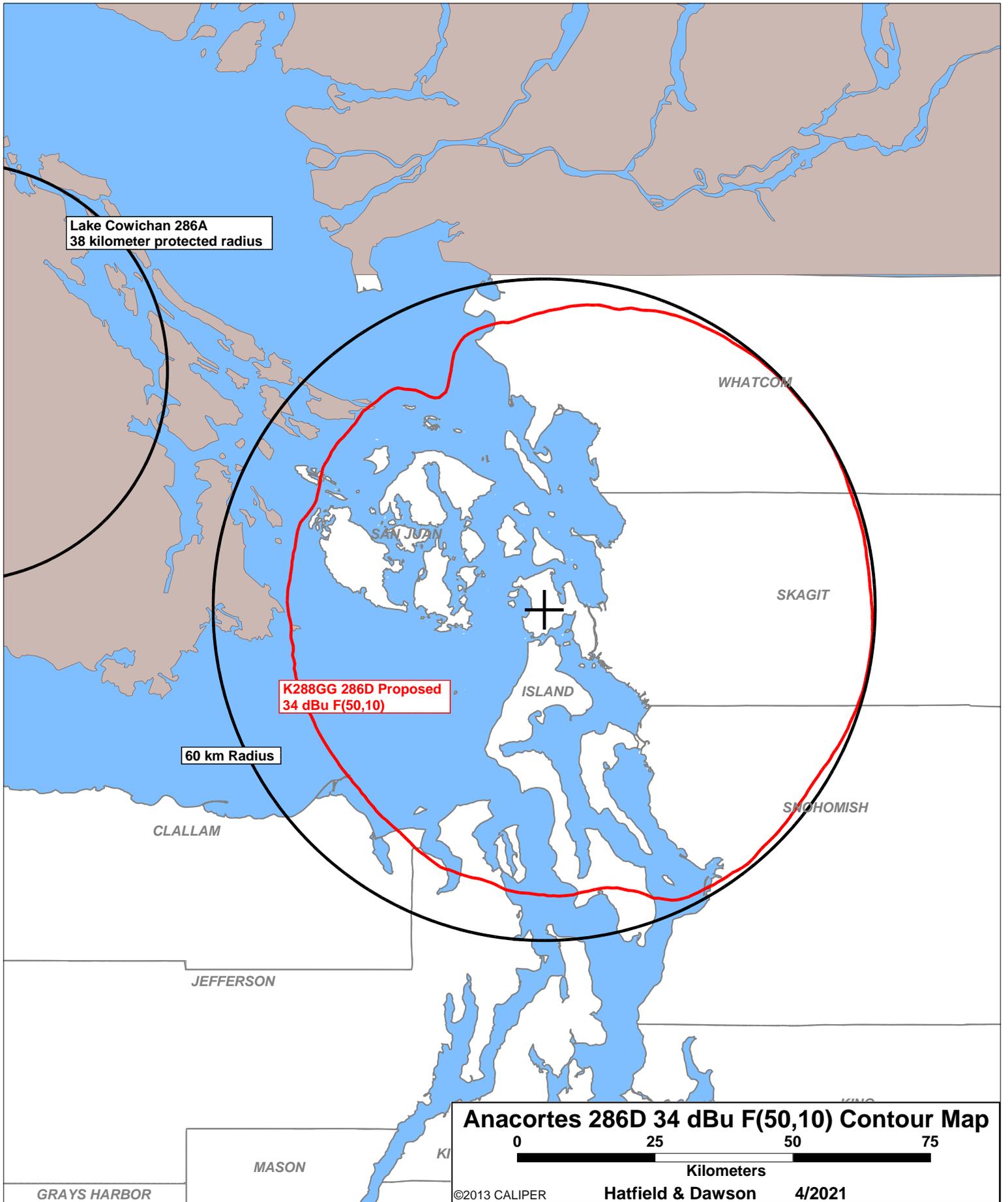
**Anacortes 286D 1 Adj Study Map**

0 10 20 30

Kilometers

Hatfield & Dawson 4/2021





Lake Cowichan 286A  
38 kilometer protected radius

K288GG 286D Proposed  
34 dBu F(50,10)

60 km Radius

**Anacortes 286D 34 dBu F(50,10) Contour Map**

0 25 50 75

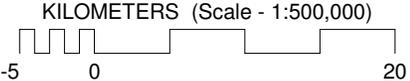
Kilometers

Hatfield & Dawson 4/2021

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SIGNAL™: K288GG Mt Vernon



Anacortes 286D to Metchosin 286A

Hatfield & Dawson

Exhibit

Mar 2018

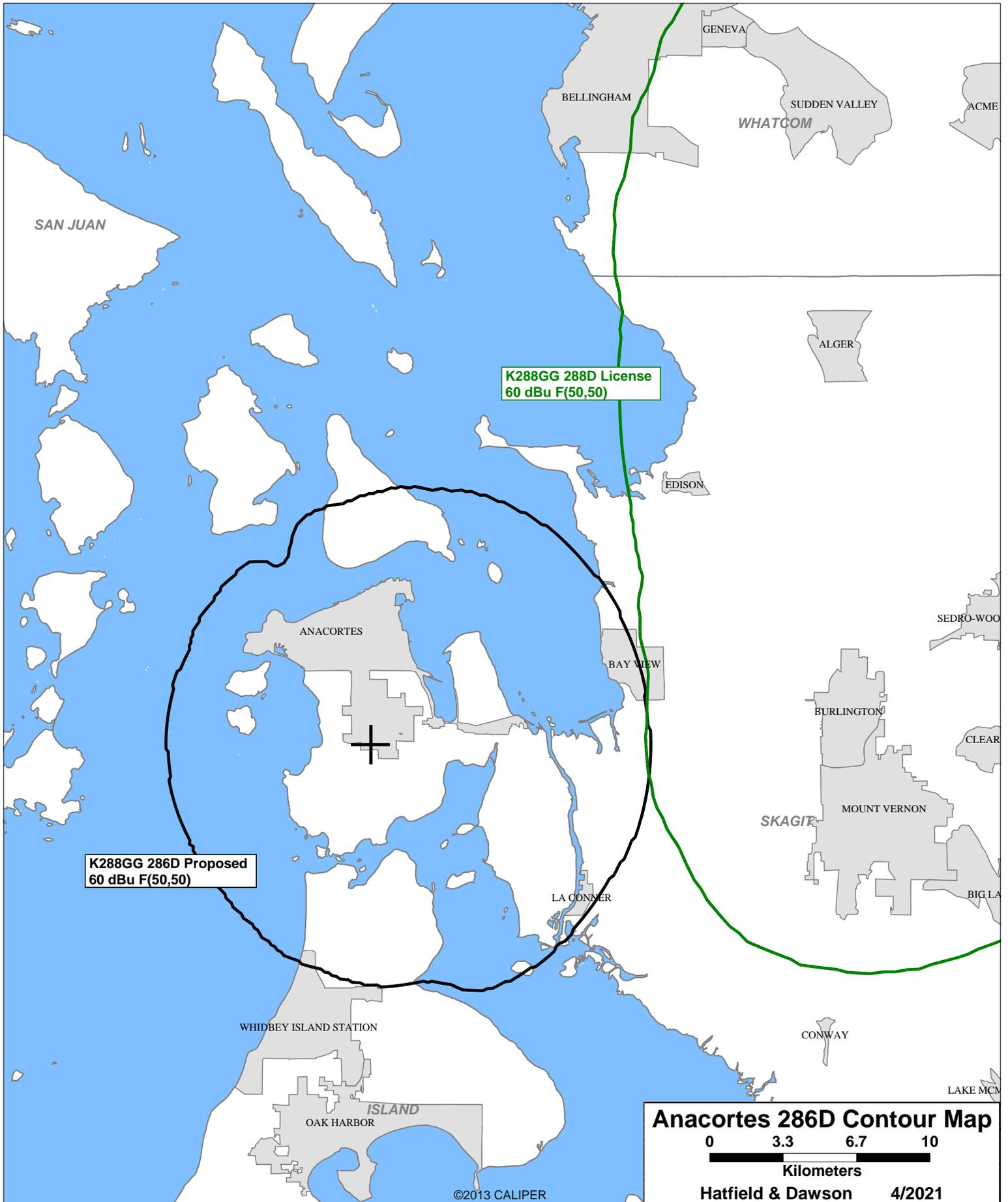
**April 2021**  
**FM Translator K288GG**  
**Anacortes, Washington Channel 286D**  
**RF Exposure Study**

**Facilities Proposed**

The proposed operation will be on Channel 286D (105.1 MHz) with an effective radiated power of 14.5 watts. Operation is proposed with a single-bay dipole antenna to be mounted on an existing tower on Mount Erie, with FCC Antenna Structure Registration Number 1033080.

**RF Exposure Considerations**

Section 1.1307(b)(1) of the Commission's Rules exempts FM translators and boosters operating with an effective radiated power of 100 watts or less from the requirement to submit an Environmental Assessment to determine compliance with FCC specified guidelines for human exposure to radiofrequency electromagnetic fields. The applicant proposes operation with a maximum lobe effective radiated power of 14.5 watts and therefore no calculations have been submitted. Nonetheless, public access to the site is restricted and all station personnel and contractors are required to follow appropriate safety procedures, including turning off the transmitter if necessary, prior to commencing work on the antenna tower.



**K288GG 288D License  
60 dBu F(50,50)**

**K288GG 286D Proposed  
60 dBu F(50,50)**

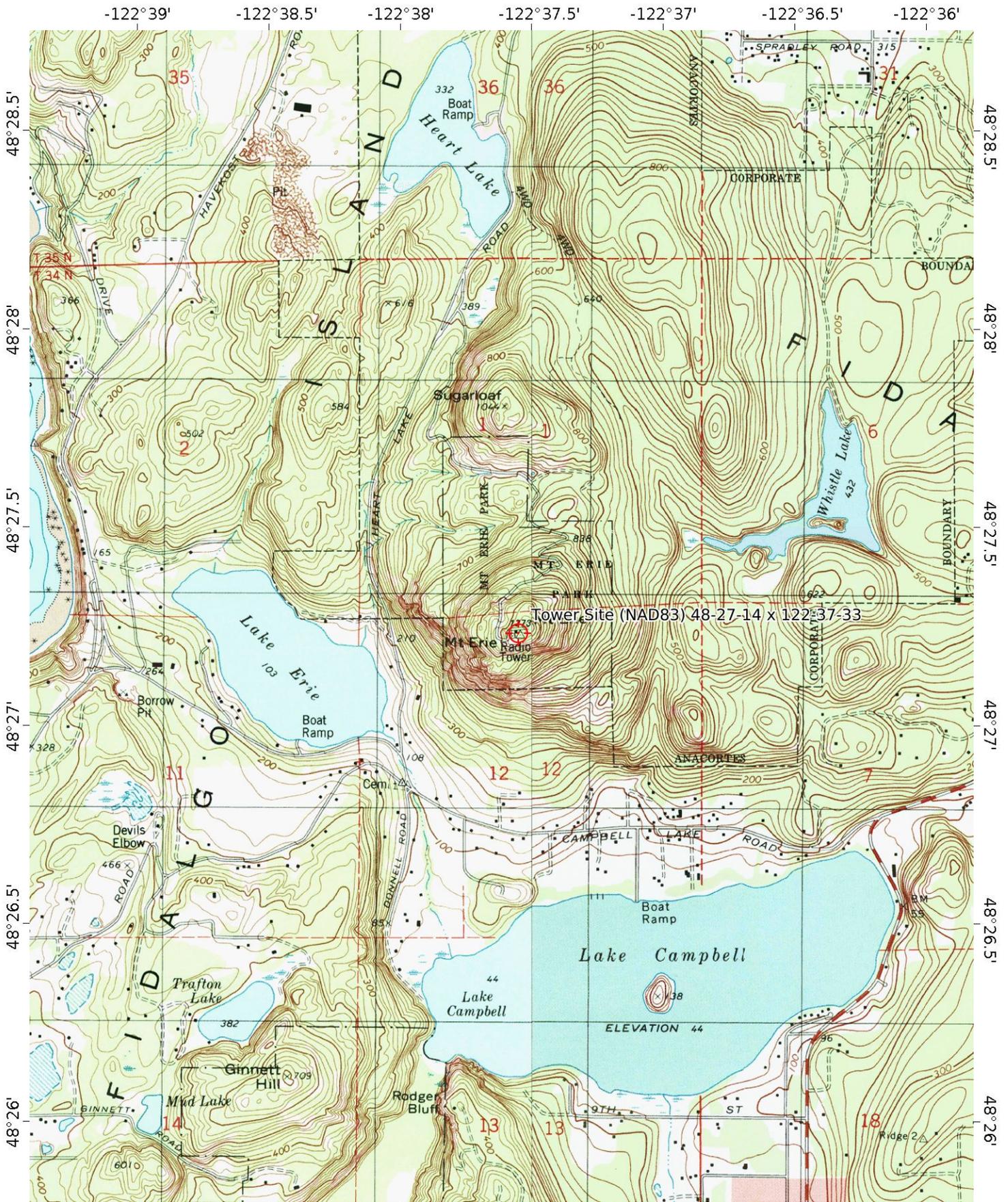
**Anacortes 286D Contour Map**

0 3.3 6.7 10

Kilometers

Hatfield & Dawson 4/2021

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Mercator Projection  
 WGS84  
 USNG Zone 10UEU  