

**Section 74.1204 - Statement of Compliance**  
**K275AA, Springfield, OR to Channel 251D**  
**FCC File No. BLFT-19940620TA**  
**FM Translator Facility ID. 30652**  
**May, 2021**

As demonstrated elsewhere in this Application, the Applicant proposes a minor modification to the above-referenced, non-reserved band, FM translator authorization. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent first-adjacent channel (See Exhibit 1) assignments, authorizations and applications. Presently, FM translator station K251BN (Facility ID 49823) is licensed to operate with the same technical facilities proposed herein for K275AA pursuant to FCC License No. BLFT-20171121ABH. In order to facilitate the processing of this application, the Applicant requests a Special Operating Condition on the resulting Construction Permit relating to K251BN. The Applicant will not begin program tests for K275AA on the proposed Channel 251 until the K251BN license is surrendered and canceled.

The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

As shown in Exhibit 2, the proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect second-adjacent channel translator station K253CF, Cottage Grove, OR (Channel 253D). The required protection to third-adjacent channel stations KEQB(FM), Coburg, OR (Channel 249C3) and K245DN, Eugene, OR (Channel 254D) are discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of the stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, KEQB(FM) is predicted to produce an F(50,50) signal strength of 132 dBu while K254DN is predicted to produce an F(50,50) signal strength of 91 dBu. Therefore, K254DN provides for a worst-case interference analysis.

In the vicinity of the third-adjacent channel translator station, the translator's relevant interfering contour is the 131 dBu contour relative to K254DN. According to

free space calculations, the translator's predicted interfering contour will extend only 28.5 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 46 meters above ground level, the predicted interference area will neither reach ground level nor reach any people within a horizontal distance of 28.5 meters of the antenna. Therefore, the instant proposal will cause no interference to any population served by either KEQB(FM) or K254DN.

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules with respect to both KEQB(FM) and K254DN because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

#### Section 74.1204 Contours

##### Proposed FX Interfering Contour (DASHED):

54 dBu F(50,10) to Class A & FX & LPFM  
54 dBu F(50,10) to Class C, C0, C1, C2 & C3  
51 dBu F(50,10) to Class B1 FM Station  
48 dBu F(50,10) to Class B FM Station

##### Relevant Protected Contours (SOLID):

Class A & FX & LPFM = 60 dBu F(50,50)  
Class C, C0, C1, C2 & C3 = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

■ K275AA.APP (251)

■ K252DL (252)

■ KTUP (252)

■ KMWV (252)

Note: KTUP and KMWV  
have identical technical  
facilities.

#### Section 74.1204 First-Adjacent Channel Contour Overlap Study

Exhibit 1 May, 2021

##### K275AA.APP

Eugene, OR  
Latitude: 44-00-03.40 N  
Longitude: 123-06-49.30 W  
ERP: 0.195 kW  
Channel: 251  
Frequency: 98.1 MHz  
AMSL Height: 441.0 m  
Horiz. Pattern: Omni

Scale 1:800,000

0 10 20 30 km

# Section 74.1204 2nd & 3rd Adjacent Channel Contour Overlap Study

Exhibit 2

May, 2021

## Key to Stations on Map

- K275AA.APP (251)
- K253CF (253)

## K275AA.APP

Eugene, OR  
Latitude: 44-00-03.40 N  
Longitude: 123-06-49.30 W  
ERP: 0.195 kW  
Channel: 251  
Frequency: 98.1 MHz  
AMSL Height: 441.0 m  
Horiz. Pattern: Omni

## Section 74.1204 Contours

Proposed FX Interfering Contour (SMALL):  
100 dBu F(50,10) to Class A & FX & LPFM  
100 dBu F(50,10) to Class C, C0, C1, C2 & C3  
97 dBu F(50,10) to Class B1 FM Station  
94 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class C, C0, C1, C2 & C3 = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

Scale 1:350,000

0 4 8 12 km