TECHNICAL STATEMENT
IN SUPPORT OF A CHANGE IN COMMUNITY
CHANNEL 288A BEAUMONT, CALIFORNIA
LAZER LICENSES, LLC

Lazer Licenses, LLC proposes a change in community of license for KXRS, from Hemet, California to Beaumont, California, under Section 307(b) of the Communications Act.[1] This proposal constitutes a Priority 4 FM allotment as Beaumont currently has one other local commercial radio service. The present community of license has three local commercial radio services and thus it also falls under Priority 4. After the proposed change in community, both Hemet and Beaumont will have two local services. This proposal is considered to be a preferential arrangement of allotments because the addition of a second local service is generally preferred over the retention of a third local service.

KXRS currently holds a construction permit (CP) that authorizes an adjacent channel change and thus the station is now operating under an implied special temporary authorization (STA) at its licensed site.[2] The present CP facility entails building a new 43 ft. tall antenna structure and a new 100 sq. ft. equipment building, which would be located approximately 650 ft. a part on a vacant 38 acre parcel that the station owns. Because the local jurisdiction has imposed numerous conditions for land disturbance in these two separate areas that are collectively too burdensome for KXRS to undertake, the station is unable to be licensed at its CP site. However, for the purpose of this analysis, the CP site was used for comparison under Section 307(b).

For the reasons stated above, KXRS is now seeking to consolidate the antenna structure and equipment building at one common site. This will result in a smaller footprint of land disturbing activity, which will significantly reduce the potential impact on the environment and make the undertaking feasible for the station. The new site will also enable the station to serve most of the areas that would have been covered if the present CP facility had been effectuated.

[1] 47 U.S.C. § 307(b) ("Section 307(b)").

[2] BMPH-20180716AAU authorizes KXRS to move from Channel 289A to Channel 288A.

The Urbanized Area Service Presumption (UASP) requires that the present and proposed communities also be compared under Priority 4. This is because the facilities for both communities would provide a 70 dBu signal over more than 50 percent of the Hemet, CA urbanized area as depicted in Figure 1.

A comparison of the 60 dBu contours for the present and proposed communities are shown in Figure 2. This figure also provides the service population and technical parameters associated with both communities. Figure 3 demonstrates there will be no gain or loss of service in areas where the total number of radio reception services is fewer than six. Therefore, the resultant gain and loss areas are both considered to be well-served.

In conclusion, the proposed change in community is believed to be grantable based on the findings provided herein. It is further believed that such a grant will serve the public interest as a second local service at Beaumont, CA is preferable to the retention of a third local service at Hemet, CA under Priority 4.

The undersigned, who has been engaged in the field of consulting radio and television engineering since 1985 and whose qualifications are a matter of record with the Federal Communications Commission, declares under penalty of perjury that all of the facts and data included in or attached to the foregoing statement are true and correct to the best of his knowledge and belief.

Respectfully submitted,

Scott Turpie
Senior Technical Consultant
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Alexandria, VA 22302
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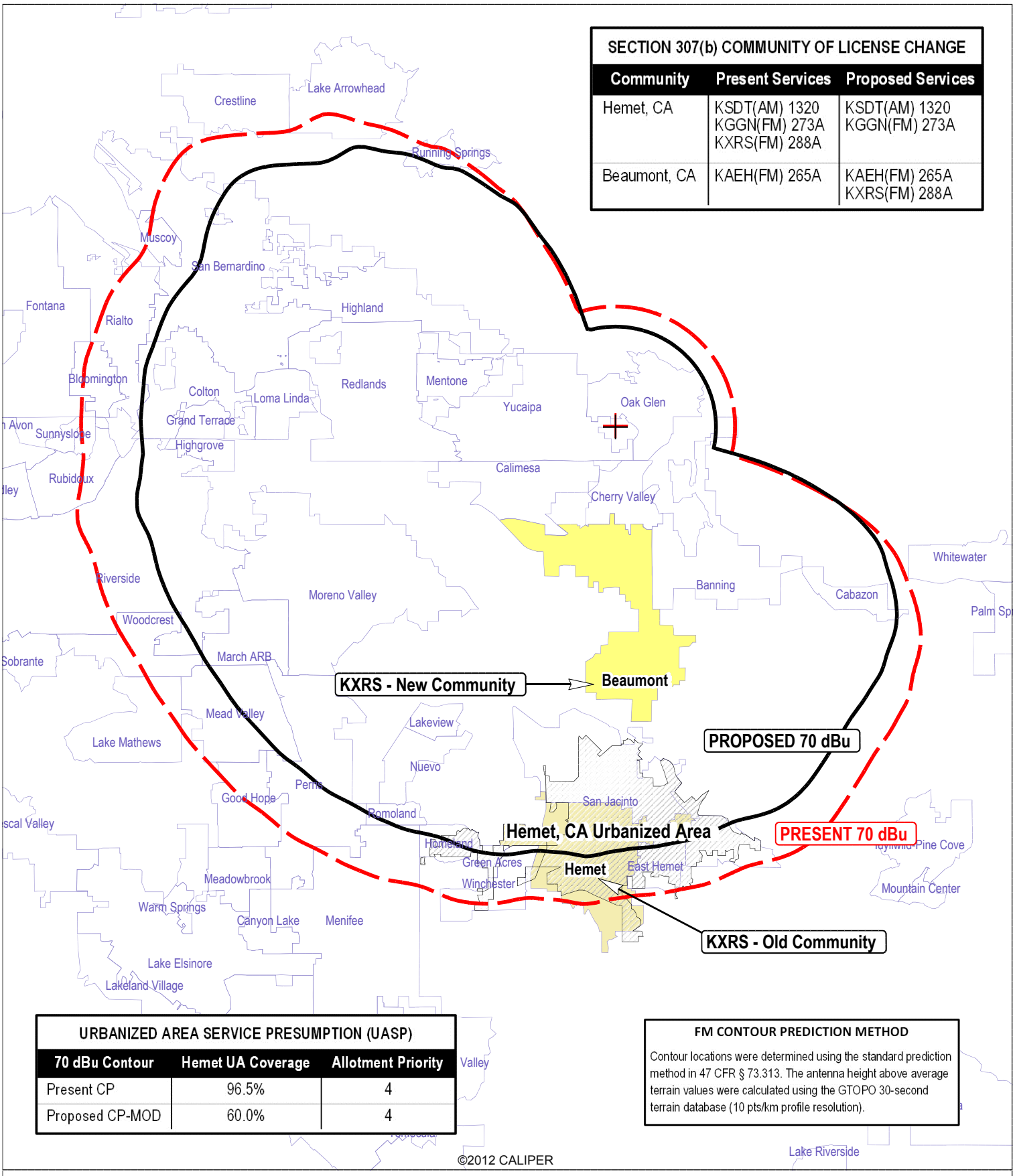
December 15, 2021

Attachments:
Figure 1 – FM Allotment Priority
Figure 2 – Change in Service Area
Figure 3 – Other Services



SECTION 307(b) COMMUNITY OF LICENSE CHANGE		
Community	**Present Services**	**Proposed Services**
Hemet, CA	KSDT(AM) 1320 KGGN(FM) 273A KXRS(FM) 288A	KSDT(AM) 1320 KGGN(FM) 273A
Beaumont, CA	KAEH(FM) 265A	KAEH(FM) 265A KXRS(FM) 288A

URBANIZED AREA SERVICE PRESUMPTION (UASP)		
70 dBu Contour	**Hemet UA Coverage**	**Allotment Priority**
Present CP	96.5%	4
Proposed CP-MOD	60.0%	4

FM CONTOUR PREDICTION METHOD

Contour locations were determined using the standard prediction method in 47 CFR § 73.313. The antenna height above average terrain values were calculated using the GTOPO 30-second terrain database (10 pts/km profile resolution).

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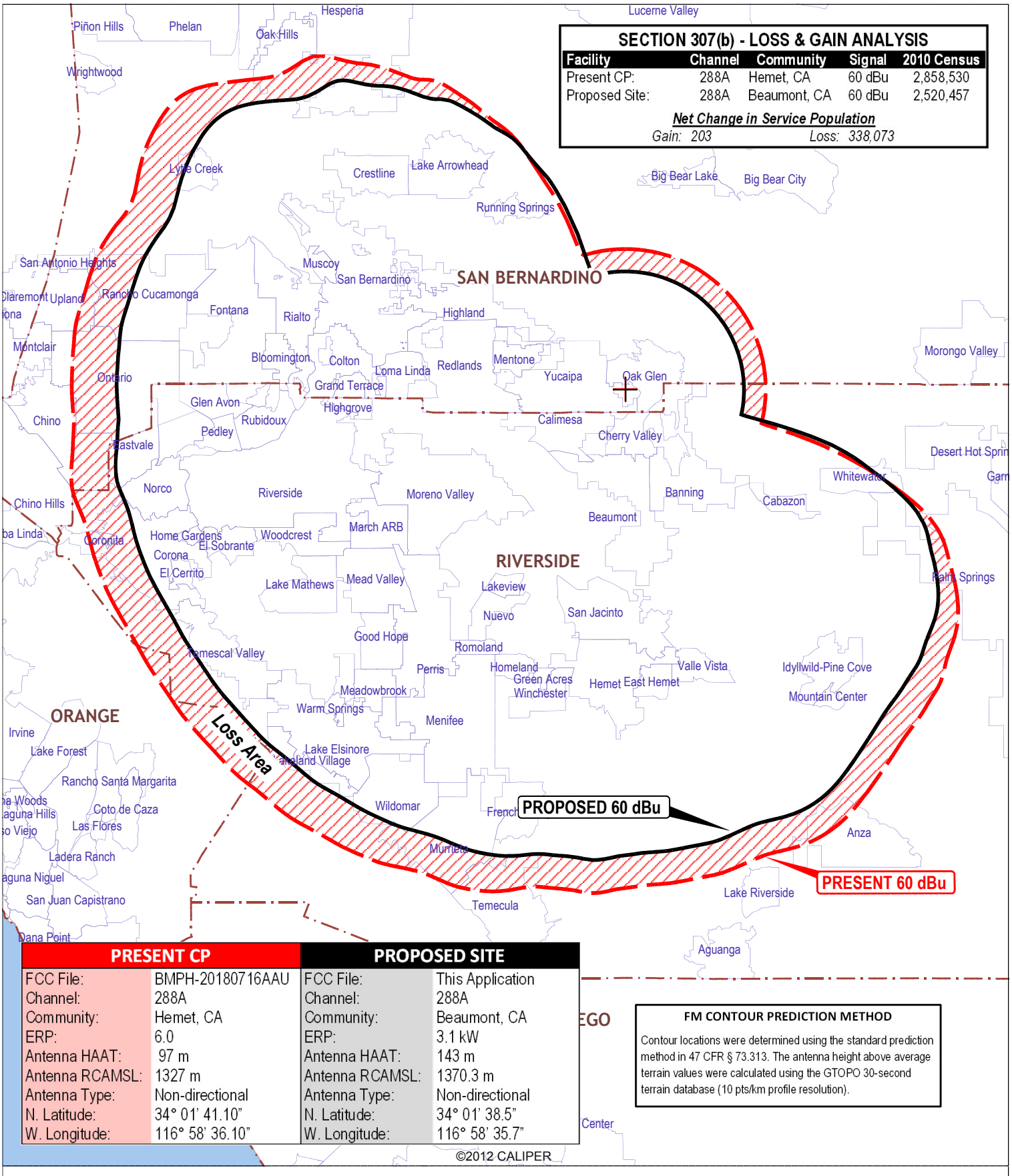
Scale 1:400,000

4 0 4 8 12 16
Kilometers

FIGURE 1
FM ALLOTMENT PRIORITY
PRESENT & PROPOSED COMMUNITIES
KXRS FACILITY ID NO. 36829
LAZER LICENSES, LLC

December 2021



PRESENT CP		PROPOSED SITE	
FCC File:	BMPH-20180716AAU	FCC File:	This Application
Channel:	288A	Channel:	288A
Community:	Hemet, CA	Community:	Beaumont, CA
ERP:	6.0	ERP:	3.1 kW
Antenna HAAT:	97 m	Antenna HAAT:	143 m
Antenna RCAMSL:	1327 m	Antenna RCAMSL:	1370.3 m
Antenna Type:	Non-directional	Antenna Type:	Non-directional
N. Latitude:	34° 01' 41.10"	N. Latitude:	34° 01' 38.5"
W. Longitude:	116° 58' 36.10"	W. Longitude:	116° 58' 35.7"

FM CONTOUR PREDICTION METHOD

Contour locations were determined using the standard prediction method in 47 CFR § 73.313. The antenna height above average terrain values were calculated using the GTOPO 30-second terrain database (10 pts/km profile resolution).

Scale 1:600,000

5 0 5 10 15 20

Kilometers

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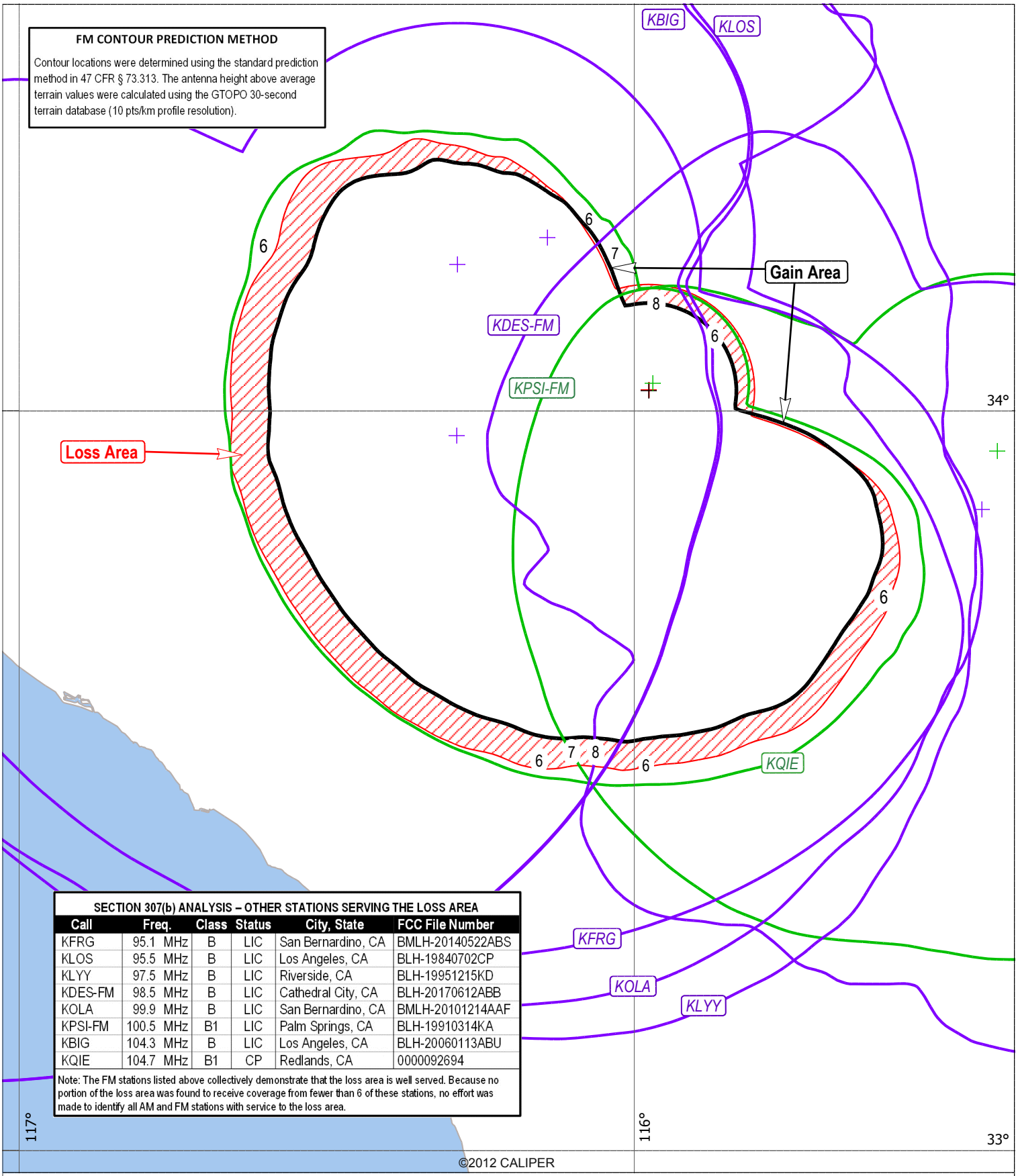
FIGURE 2
CHANGE IN SERVICE AREA
PRESENT CP AND PROPOSED SITE
KXRS FACILITY ID NO. 36829
LAZER LICENSES, LLC

December 2021



SECTION 307(b) ANALYSIS – OTHER STATIONS SERVING THE LOSS AREA

Call	Freq.	Class	Status	City, State	FCC File Number
KFRG	95.1 MHz	B	LIC	San Bernardino, CA	BMLH-20140522ABS
KLOS	95.5 MHz	B	LIC	Los Angeles, CA	BLH-19840702CP
KLYY	97.5 MHz	B	LIC	Riverside, CA	BLH-19951215KD
KDES-FM	98.5 MHz	B	LIC	Cathedral City, CA	BLH-20170612ABB
KOLA	99.9 MHz	B	LIC	San Bernardino, CA	BMLH-20101214AAF
KPSI-FM	100.5 MHz	B1	LIC	Palm Springs, CA	BLH-19910314KA
KBIG	104.3 MHz	B	LIC	Los Angeles, CA	BLH-20060113ABU
KQIE	104.7 MHz	B1	CP	Redlands, CA	0000092694

Note: The FM stations listed above collectively demonstrate that the loss area is well served. Because no portion of the loss area was found to receive coverage from fewer than 6 of these stations, no effort was made to identify all AM and FM stations with service to the loss area.

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RADIO SERVICE CONTOURS

Loss Area — Proposed 60 dBu
FM Class B1 57 dBu — FM Class B 54 dBu

Scale 1:800,000
5 0 5 10 15 20
Kilometers

FIGURE 3
OTHER SERVICES
TO LOSS & GAIN AREAS SHOW
THESE AREAS ARE WELL SERVED
KXRS FACILITY ID NO. 36829
LAZER LICENSES, LLC

December 2021