

TELECOMMUNICATIONS ENGINEERING
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27 February 2023

Prepared for KORE Broadcasting, LLC
K239CM – Eugene, Oregon

Request for Waiver of the Rules

The applicant hereby respectfully requests a waiver of 47CFR§74.1233(a)(1)(A)(1) and 47CFR§74.1233(b)(3), to the degree necessary.

The applicant proposes a change in frequency to a channel that is neither 1, 2 or 3 or 53 or 54 channels removed the authorized frequency.

K239CM has consistently suffered from co-channel interference from K239BP, Flynn, Oregon.

The applicant respectfully requests that the *instant* application be treated as a displacement application and treated as a minor modification per long-standing Commission policy.

Attached are preclusion studies demonstrating the a change in frequency to the adjacent and IF-related channels is not possible.

Gray Frierson Haertig & Assoc.
Portland, Oregon

CHANNEL PRECLUSION STUDY
Preclusion Study Channels 236 Through 241
KORE Broadcasting

REFERENCE
44 00 06.00 N.
123 06 51.60 W.

Class= D , Pwr=.25 kW, HAAT= 237.7 M, COR= 436 M
Average Protected F(50-50)= 20.17 km
Omni-directional

DISPLAY DATES
DATA 06-07-23
SEARCH 06-24-23

CH CITY	CALL	TYPE ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
--- Channel 236 95.1 MHz. ---										
237C3 KUJZ Creswell		LIC _CN OR	148.1 328.1	0.10 BLH20190724AAB	44 00 03.00 123 06 49.00	1.750 366	63.9 567	42.1 Cumulus Licensing LLC	-83.7*	-71.5*
233C1 KMGJ Eugene		LIC _EN OR	147.5 327.5	0.09 BLH19970925KE	44 00 03.40 123 06 49.30	49.000 396	10.0 588	76.4 Mckenzie River Broadcastin	-29.7*	-77.5*
235D K235BF Eugene		LIC _CN OR	348.2 168.2	0.07 BLFT20111024AIT	44 00 08.40 123 06 52.30	0.099 236	18.3 433	12.3 Catholic Broadcasting Nort	-41.2*	-46.6*
236C3 KSND Monmouth		LIC _CN OR	338.5 158.1	106.10 BMLH20050705ADS	44 53 18.40 123 36 30.30	1.000 477	113.3 1007	37.7 Bustos Media Holdings, LLC	-26.8*	-6.3
239D K239CM Eugene		LIC _CN OR	0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	0.7 436	18.7 Kore Broadcasting, LLC	-23.5*	-19.8*
--- Channel 237 95.3 MHz. ---										
237C3 KUJZ Creswell		LIC _CN OR	148.1 328.1	0.10 BLH20190724AAB	44 00 03.00 123 06 49.00	1.750 366	108.5 567	42.1 Cumulus Licensing LLC	-128.2*	-103.3*
235D K235BF Eugene		LIC _CN OR	348.2 168.2	0.07 BLFT20111024AIT	44 00 08.40 123 06 52.30	0.099 236	0.7 433	12.3 Catholic Broadcasting Nort	-23.6*	-13.4*
239D K239CM Eugene		LIC _CN OR	0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	0.7 436	18.7 Kore Broadcasting, LLC	-23.5*	-19.8*
--- Channel 238 95.5 MHz. ---										
237C3 KUJZ Creswell		LIC _CN OR	148.1 328.1	0.10 BLH20190724AAB	44 00 03.00 123 06 49.00	1.750 366	63.9 567	42.1 Cumulus Licensing LLC	-83.7*	-71.5*
241C KZEL-FM Eugene		RSV-A OR	146.9 327.0	12.80	43 54 18.45 123 01 37.29	100.000 600	13.9 891	92.5 From CDBS	-20.8*	-80.8*
241C0 KZEL-FM Eugene		LIC _EN OR	147.5 327.5	0.09 BMLH20120808ABF	44 00 03.40 123 06 49.30	100.000 333	11.5 525	79.3 Cumulus Licensing LLC	-31.2*	-80.3*
239D K239CM Eugene		LIC _CN OR	0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	27.6 436	18.7 Kore Broadcasting, LLC	-50.4*	-52.7*
235D K235BF Eugene		LIC _CN OR	348.2 168.2	0.07 BLFT20111024AIT	44 00 08.40 123 06 52.30	0.099 236	0.7 433	12.3 Catholic Broadcasting Nort	-23.6*	-13.4*
--- Channel 239 95.7 MHz. ---										
239D K239CM Eugene		LIC _CN OR	0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	58.9 436	18.7 Kore Broadcasting, LLC	-81.7*	-87.3*
241C KZEL-FM Eugene		RSV-A OR	146.9 327.0	12.80	43 54 18.45 123 01 37.29	100.000 600	13.9 891	92.5 From CDBS	-20.8*	-80.8*
241C0 KZEL-FM Eugene		LIC _EN OR	147.5 327.5	0.09 BMLH20120808ABF	44 00 03.40 123 06 49.30	100.000 333	11.5 525	79.3 Cumulus Licensing LLC	-31.2*	-80.3*
237C3 KUJZ Creswell		LIC _CN OR	148.1 328.1	0.10 BLH20190724AAB	44 00 03.00 123 06 49.00	1.750 366	2.7 567	42.1 Cumulus Licensing LLC	-22.5*	-43.1*
239D K239BP Flynn		LIC _CN OR	349.9 169.7	72.12 BLFT20141031ADT	44 38 24.40 123 16 29.30	0.016	43.3 460	12.7 Community Media Assistance	5.8	-9.7
239D K239BP Flynn		APP _CN OR	349.9 169.7	72.12 0000214301	44 38 24.40 123 16 29.30	0.016	43.3 460	12.7 Community Media Assistance	5.8	-9.7
--- Channel 240 95.9 MHz. ---										
241C KZEL-FM Eugene		RSV-A OR	146.9 327.0	12.80	43 54 18.45 123 01 37.29	100.000 600	137.4 891	92.5 From CDBS	-144.3*	-108.9*
241C0 KZEL-FM Eugene		LIC _EN OR	147.5 327.5	0.09 BMLH20120808ABF	44 00 03.40 123 06 49.30	100.000 333	117.6 525	79.3 Cumulus Licensing LLC	-137.3*	-108.6*
239D K239CM Eugene		LIC _CN OR	0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	27.6 436	18.7 Kore Broadcasting, LLC	-50.4*	-52.7*

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	Page # 2 *IN* (Overlap in km)	*OUT*
237C3 Creswell	KUJZ	LIC _CN OR		148.1 328.1	0.10 BLH20190724AAB	44 00 03.00 123 06 49.00	1.750 366	2.7 567	42.1 Cumulus Licensing LLC	-22.5*	-43.1*
--- Channel 241 96.1 MHz. ---											
241C Eugene	KZEL-FM	RSV-A OR		146.9 327.0	12.80	43 54 18.45 123 01 37.29	100.000 600	198.9 891	92.5 From CDBS	-205.8*	-140.6*
241C0 Eugene	KZEL-FM	LIC _EN OR		147.5 327.5	0.09 BMLH20120808ABF	44 00 03.40 123 06 49.30	100.000 333	182.3 525	79.3 Cumulus Licensing LLC	-202.0*	-140.3*
239D Eugene	K239CM	LIC _CN OR		0.0 0.0	0.00 BLFT20161123ABD	44 00 06.00 123 06 51.60	0.110	0.7 436	18.7 Kore Broadcasting, LLC	-23.5*	-19.8*

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin KM
In & Out distances between contours are shown at closest points. Reference Zone= - ZN2
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside restricted contour.
All separation margins include rounding

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Portland, Oregon

CHANNEL PRECLUSION STUDY
Preclusion Study Channels 292 and 293
KORE Broadcasting

REFERENCE
44 00 06.00 N.
123 06 51.60 W.

Class= D , Pwr=.25 kw, HAAT= 237.7 M, COR= 436 M
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--- Channel 292 106.3 MHz. ---										
292C	KLOO-FM	LIC _CN	350.2	72.73	44 38 46.40	100.000	185.1	81.8	-135.4*	-78.1*
Corvallis		OR	170.1	BMLH20140324AAA	123 16 14.30	347	500	Bicoastal Media Licenses V		
--- Channel 293 106.5 MHz. ---										
292C	KLOO-FM	LIC _CN	350.2	72.73	44 38 46.40	100.000	121.4	81.8	-71.7*	-43.4*
Corvallis		OR	170.1	BMLH20140324AAA	123 16 14.30	347	500	Bicoastal Media Licenses V		
296C1	KLVU	LIC NCN	38.2	68.22	44 28 58.40	10.000	6.4	78.3	40.8	-11.2*
Sweet Home		OR	218.5	BLED20151029AHG	122 34 58.30	725	1249	Educational Media Foundati		
294L1	KSOW-LP	LIC _CN	173.7	27.98	43 45 05.40	0.100		0.4		-3.5
Cottage Grove		OR	353.7	BLL20041101AAA	123 04 33.20	-38	245	Real Rural Radio		

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"*"affixed to 'IN' or 'OUT' values = site inside restricted contour.
All separation margins include rounding