

KUSF-LP 96.1 FM San Francisco, California
MINOR MODIFICATION OF CONSTRUCTION PERMIT

Channel	241
New Location:	37° 58' 49.1" N, 122° 31' 45.5"W -- NAD 83
Relocation:	Minor Change, see overlapping contours
Antenna AGL	8 m
Antenna Ground	200 m
Antenna COR	208 m
ASR	N/A
Total Tower Height	34 m AMSL
HAAT	101.2 m
Power	8 w



Overlapping Licensed 60 dBu and Proposed 60 dBu¹

¹ The Height of Radiation Center Above Mean Sea Level is listed as 17 m LMS on the licensed facility's original construction permit instead of 145.2 m. The FCC LMS form originally calculated RCAMSL *incorrectly* (LMS form Schedule 318 was in beta testing while put into public use) while the other parameters supplied to calculate this were correct. The LMS LPFM construction permit form was just placed into circulation at this time and contained this autocalculation error for which the Height of Radiation Center Above Mean Sea Level is still listed wrong at 17 m. So the 60 dBu contour is incorrectly still listed as a 3 km contour-radius on the record.

World Peace Through Technology

REFERENCE

DISPLAY DATES

37 58 49.10 N.

CLASS = L1

DATA 05-30-23

122 31 45.50 W.

Current Spacings to 2nd Adj.

SEARCH 08-20-23

----- Channel 241 - 96.1 MHz -----

Call		Channel	Location		Azi	Dist	FCC	Margin
*KOIT	LIC	243B	San Francisco	CA	164.9	25.87	66.5	-40.6
*KGMZ-FM	LIC	239B	San Francisco	CA	166.0	33.25	66.5	-33.3
KPEA-LP/KCP	LIC	241L1	Sausalito	CA	176.3	11.71	23.5	11.8
KUSF-LP	LIC	241L1	San Francisco	CA	182.5	12.00	23.5	11.4
KYMX	LIC	241B	Sacramento	CA	49.1	112.10	111.5	0.6
KEXU-LP	LIC	241L1	Oakland	CA	130.3	33.78	23.5	10.3
KACR-LP	LIC	241L1	Alameda	CA	133.8	34.76	23.5	11.3
KJTZ-LP	LIC	241L1	Alameda	CA	133.8	34.76	23.5	11.3
KRSH	LIC	240A	Healdsburg	CA	341.7	88.37	55.5	32.9
KSQQ	LIC	241A	Morgan Hill	CA	144.0	109.22	66.5	42.7

All separation margins include rounding

*Second adjacent waiver request

Second Adjacent Waiver Request

License respectfully requests a "second adjacent channel waiver" with regards to Section 47 C.F.R. Section 73.807 of the FCC rules based upon the "Living Way" precedence (Living Way Ministries, Inc., Memorandum Opinion and Order, 17 FCC Red 17054, 17056, ¶ 5 (2002), recon. denied 23 FCC Red 15070 (2008)). This will be accomplished by using Free Space methodology of calculation.

Using U/D methodology, at the proposed KUSF-LP transmitter location KOIT has a signal strength of 81.4 dBu with 16.5 m to 121.4 dBu interference contour. At the proposed site, KGMZ has a signal strength of 69.0 dBu with interference area bounded by 70.1 m 109 dBu interference contour interference area. The aerial shot below shows an interference area with zero population located within it.



Due to zero population within this radiation radius, this meets the "Living way" Criteria to qualify for a Waiver of 47 C.F.R. Section 73.807. Thus, the applicant requests second adjacent waiver based upon evidence no interference is proposed.