

TECHNICAL STATEMENT
MINOR CHANGE APPLICATION K243BD, SALINA, KS.
MODIFICATION APPLICATION & SPECIFY KMCP(AM) 1540 KHZ MCPHERSON, KS
AS PRIMARY STATION. WAIVER OF SECTION 74.1233(a)(1) "MATTOON WAIVER"
AUGUST 27, 2023

This Technical Statement supports the application for FM Construction Permit, to relocate K243BD, Salina, KS (FCC ID 142242). K243BD is an existing FM translator of KLBG (FM), Channel 238C3 (95.5 MHz.) Lindsborg, KS (FCC Facility ID 3483). Both KLBG and K243BD are commonly owned by Ad Astra Per Aspera Broadcasting (Astra). This proposal will move K243BD to a new site, change height, change frequency to first-adjacent FM Channel 242, and change the primary station to co-owned KMCP (AM), McPherson, KS. Exhibit 1 is a map depicting the present and proposed signals.

The proposed FM fill in contour is within the 2.0 mV/m daytime contour of KMCP, and within 25 miles (40.2 KM) of the KMCP tower site.

This application requests processing utilizing a Mattoon Waiver.

INTRODUCTION: Astra is the licensee of K243BD. It hereby requests approval of this minor change application to relocate translator K243BD to serve as a fill-in service for AM station KMPC (AM) 1540 kHz. This approval is sought in a one-step filing. To accomplish this one-step move, a waiver of Section 74.1233(a)(1) of the Commission's Rules is respectfully requested; commonly referred to as a "Mattoon Waiver".

REQUEST FOR WAIVER OF SECTION 74.1233(A)(1) A waiver of Section 74.1233(a)(1) of the Commission's rules is requested to permit in a single move the modification of FM translator K243BD from its current transmitter site to an existing tower near Lindsborg, KS. This waiver, if granted, would provide FM translator fill-in service for AM station KMCP (AM) in an expedited manner, avoid unnecessary and onerous translator site move expenses, and eliminate the processing of multiple interim step applications, thereby, preserving the Commission limited staff resources. Grant of the waiver would also expeditiously provide for improved coverage to the Public during nighttime operations of KMCP(AM). Strict adherence to the procedural standards of Section 74.1233(a)(1) in the instant case would only result in a delay.

Section 74.1233(a)(1) currently classifies as minor only those changes where the 60 dBu contours of the existing and proposed FM translator facilities overlap. However, pursuant to Section 74.1204(a) of the Commission's overlap rules, a first-adjacent translator cannot be located at a distance less than the distance in which the protected and interfering contours of the existing and proposed translator transmitter overlap. The Commission has therefore approved "Mattoon waivers" to permit the relocation of translator where the proposed site would be mutually exclusive with the current site based on these interference limitations, provided that the translator is intended as a fill-in service for an AM station. This application qualifies under these Mattoon waiver standards.

The proposed modification of the subject translator is being moved no more than the distance of the sums of distance to each of the protected and interfering co-channel contours. The existing and proposed sites are mutually exclusive. Therefore, it is submitted that a waiver of Section 74.1233(a)(1) of the Commission's rules is in the public interest provided the subject translator is intended to provide

fill-in service for an AM station. It is respectfully requested that the Commission grant a waiver of Section 74.1233 (a)(1) in this application as the move complies with the Mattoon standards (See attached Exhibit).

CONCLUSION : Accordingly, for the reasons state above, it is respectfully requested that the Commission grant this waiver permitting a one-step move for K243BD which proposes to serve as a fill-in translator for an AM station KMCP(AM).

SITE SURVEY:

Proposed tower site ASR: 1212387

There are NO FM stations or applications within 10 km of the reference point.

There are NO TV stations or applications within 10 km of the reference point.

There are NO AM stations or applications within 3 km of the reference point.

INTERNATIONAL/QUIET ZONE COORDINATION:

Point nearest is 1037.5 km at 201.0 deg. true to MEXICAN BORDER; site CLEARS the required 320 km separation FM translator > 125 km and CLEAR for 250 Watts.

Point nearest is 1148.3 km at 14.4 deg. true to CANADIAN BORDER; Site CLEARS the required 320 km separation.

Point nearest is 269.7 km at 345.8 deg. true to FCC MONITORING SITES

CLEARS all required distances for MONITORING Coordination.

CLEARS Astronomy Observatory at Green Bank WV.

CLEARS all required distances for Boulder, CO Coordination.

SECTION 74.1204 CHANNEL STUDY: Exhibit 2 is a channel study for channel 242B based on section 74.1204. The exhibit lists the results of a numerical analysis of the potential for contour overlap to all nearby co-channel, first, second and third-adjacent channel facilities, and IF frequencies. For the purposes of the numerical study, the maximum height AMSL (497.8 meters) and ERP (0.25 KW) values were used in determining the maximum distance in any direction to the predicted coverage and interfering contours. As shown, the site clears all potential outgoing interference overlap, with the exception of the reference coordinates for the current facilities of K243BD.

RFR COMPLIANCE: The proposed facility was evaluated in terms of potential radio frequency (RF) energy exposure to workers and the general public. The proposed transmitting antenna will be side-mounted at the 95 meter level on an existing tower. Using the FCC's FM Model program, with antenna height of 95 meters above ground level, 250 watts in both vertical and horizontal polarization, and 2- element EPA Type 2 Opposed V Dipole with 0.75 wavelength spacing, the calculated peak power density of 0.11 uW/cm-squared occurs at 37.6 meters from the tower base, which is .001% of the maximum 1000 uW/sq cm. in the controlled environment, and 0.056% of the maximum limit in the uncontrolled environment.

Access to the transmitting will be restricted and appropriately marked with warning signs. Furthermore, a protocol will be in place to ensure that appropriate measures will be taken to assure

worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing accepted RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

CERTIFICATION: This comprehensive technical report has been prepared on behalf of Ad Astra Per Aspera Broadcasting by the undersigned or under his direction and is true and correct to the best of his information, knowledge and belief. My qualifications are a matter of record before the FCC.

A handwritten signature in black ink that reads "George Nicholas". The signature is fluid and cursive, with a long horizontal flourish at the end.

George Nicholas
Technical Consultant
George Nicholas Communications, LLC
8/28/2023