

Waiver Request
DTDRT for KQSL
April 24, 2020

One Ministries, Inc. (OMI) seeks the ability to locate a digital replacement translator to fill in coverage in the Cloverdale, CA, area. Although KQSL was not repacked, allowing KQSL the ability to reach viewers via a digital replacement translator in northern Sonoma County that can't receive TV signals over the air is a more effective implementation of overall Commission policy. No other full power station has contour coverage over Cloverdale and Alderglen Springs, California, as of May 1, 2020. The Commission has historically allowed waivers to promote its goals of filling in white space areas. As an outcome of the TV incentive auction was no other full power stations being located in the entire northern half of the San Francisco market including the counties of Marin, Napa, Sonoma, Lake, and Mendocino. There were previously two full power TV stations transmitting in Sonoma County prior to the repack, KRCB and KEMO.

The rule that OMI seeks to waive is 47 CFR 74.787 (a)(5)(v) to allow KQSL a digital-to-digital replacement translator to fill in white space over Sonoma County within KQSL's service contour for the community of Cloverdale. A minimum power of 200 watts has been chosen so that the expansion area is minimal.

Digital-to-digital replacement translators were made available to full power TV stations to fill in coverage of stations lost during the repack. Logically, it makes sense when full power stations have vacated an area to allow the remaining TV stations to fill in coverage lost. In the end, it should not matter which station is applying to fill in coverage to people in white space areas but that the people are being covered. The Commission has put great emphasis on full power TV stations to provide emergency information to viewers in the event of natural disaster. Sonoma County has been plagued by natural disasters over the last few years including fires, floods, and pandemics. Allowing KQSL to use a digital-to-digital replacement television translator to reach Cloverdale will help for future calamities to provide viewers essential information.

Below is a map of the white space area for which this proposal will help to cover.

