

TECHNICAL STATEMENT  
MINOR CHANGE, CONTINGENT PROCESSING AND 73.215 PROCESSING REQUEST  
KEZZ(FM) PHIPPSBURG, CO, CH 231C2  
BLIZZARD BROADCASTING II COLORADO, LLC  
SEPTEMBER 2020

This Technical Statement is being filed in support of a minor change application for KEZZ(FM) Phippsburg, CO. KEZZ seeks to relocate its licensed operation to an existing tower site located on Storm Peak. It will remain a class C2 station operating on channel 231C2. KEZZ is currently licensed under the provisions of 73.215 under the commission rules. It is requesting to remain to be licensed under these same rules under 73.215. This application is being contingently and concurrently filed with a minor change application for co-owned KRAI-FM Craig, Colorado, operating on channel 229C1. While no technical changes are being proposed to the licensed operation of KRAI-FM, the application will specify the election of processing under 73.215 towards co-owned KEZZ (FM) which will allow for the relocation of KEZZ to its new proposed site.

Figure 1 is a channel spacing study conducted from the proposed site for KEZZ(FM). It shows that KEZZ on channel 231C2 will meet all of the spacing requirements under 73.207 with the exception of KRAI-FM Craig, CO on channel 229C1, facility ID 72437, and KXKK(FM) Montrose, CO, on channel 231C, facility ID 73624. Processing under 73.215 is hereby requested towards KRAI-FM and KXKK.

Figure 2 is a detailed interference study with the proposed facilities for KEZZ at the new Storm Peak tower site. As can be seen there will not be any prohibitive overlap with any other pertinent same channel or adjacent channel stations. It should be noted that KEZZ is proposing to operate with a non-directional antenna with less than maximum Class C2 facilities or 0.82

kilowatts at 523 meters HAAT. However, this ERP and HAAT combination is greater than would be allowed by a maximum class C3 facility (0.77 kw at 523 meters HAAT).

Figure 3 is a detailed interference study conducted against KRAI-FM Craig, Colorado, operating on channel 229C1. Since KRAI-FM is licensed under 73.207, it would normally be adjusted for maximum class C1 facilities when utilizing processing under 73.215. However, KRAI-FM is currently licensed to operate with 60 Kilowatts ERP at 299 meters HAAT, or less than maximum class C1 facilities. Since KRAI-FM is under common ownership with KEZZ(FM), KRAI-FM is concurrently and contingently filing a minor change application with this application for KEZZ(FM) to elect processing under 73.215 to allow for the relocation of KEZZ(FM). No change in the technical facilities of KRAI-FM is being proposed, only the election of processing under 73.215. There will be no prohibitive overlap between these two facilities both operating under 73.215.

Figure 4 is a detailed channel interference study conducted against KXKK(FM) Montrose, Colorado on channel 231C. KXKK was adjusted for maximum class C facilities or 100 KW ERP at 600 meters HAAT. As can be seen, there will be no prohibited overlap between the proposed operation of KEZZ(FM) and KXKK.

Figure 5 is the predicted City Grade or 70 dB $\mu$  contour for the proposed new operation of KEZZ(FM). It documents that the new 70 dB $\mu$  predicted contour for KEZZ will completely encompass the community of Phippsburg, Colorado, KEZZ's city of license as required.

It was determined that the new proposed operation of KEZZ(FM) will meet all of the rules and regulations of the Commission.

FIGURE 1 - CHANNEL SPACING STUDY FROM PROPOSED SITE  
KEZZ(FM) PHIPPSBURG, CO, CH 231C2

REFERENCE	CLASS = C2	DISPLAY DATES
40 27 04.80 N.		DATA 09-01-20
106 45 06.00 W.	Current Spacings to 3rd Adj.	SEARCH 09-01-20
----- Channel 231 - 94.1 MHz -----		

Call	Channel	Location		Azi	Dist	FCC	Margin
KEZZ	LIC-N 231C2	Phippsburg	CO	151.4	10.61	189.5	-178.9
KRAI-FM *	LIC-D 229C1	Craig	CO	281.1	73.94	78.5	-4.6
KKXK *	LIC 231C	Montrose	CO	198.3	246.82	248.5	-1.7
KYSL	LIC 230A	Frisco	CO	151.2	113.28	105.5	7.8
KRKS-FM	LIC-D 234C	Lafayette	CO	109.1	126.10	104.5	21.6
KCWA	LIC-Z 230A	Loveland	CO	87.5	133.20	105.5	27.7
KMAX-FM	LIC 232C3	Wellington	CO	68.1	145.85	116.5	29.4
KILO	LIC 232C	Colorado Springs	CO	138.9	249.41	187.5	61.9
KTUN	LIC 233C3	New Castle	CO	214.3	118.90	55.5	63.4
KKVM	LIC 284C1	Vail	CO	164.0	94.32	26.5	67.8
KNEB-FM	LIC 231C1	Scottsbluff	NE	60.6	293.02	223.5	69.5
KTND	LIC 228C3	Aspen	CO	188.1	127.35	55.5	71.9
KXRQ	LIC-Z 232C1	Roosevelt	UT	272.7	250.74	157.5	93.2
KTAK	LIC 230C1	Riverton	WY	335.8	277.45	157.5	120.0
KAZY	LIC 229C3	Cheyenne	WY	65.7	189.60	55.5	134.1
KMLD	LIC 233C	Casper	WY	7.7	255.91	104.5	151.4
DKKAR	VAC 285A	Wamsutter	WY	323.3	169.34	14.5	154.8
KMLD	CP 233C0	Casper	WY	8.1	257.24	88.5	168.7
KRRR	LIC-N 285C2	Cheyenne	WY	65.7	189.60	19.5	170.1
KSBV	LIC 229C2	Salida	CO	163.8	231.55	57.5	174.1
KWYX	LIC 228C1	Casper	WY	8.1	256.96	78.5	178.5
KREO	CP 228C2	James Town	WY	299.0	247.18	57.5	189.7
KREO	LIC 228C3	James Town	WY	299.0	247.18	55.5	191.7
KTRS-FM	LIC 284C1	Casper	WY	8.1	257.26	26.5	230.8
KRYD	LIC 285C1	Norwood	CO	208.1	267.83	26.5	241.3
KCGC	LIC 233C3	Merino	CO	87.1	307.74	55.5	252.2
DKKCS	VAC 284C3	Calhan	CO	127.3	279.10	16.5	262.6
KRYE	LIC 234C3	Beulah	CO	151.0	325.14	55.5	269.6
KALQ-FM	LIC 228A	Alamosa	CO	166.5	339.74	54.5	285.2
KNNG	LIC 284C1	Sterling	CO	86.1	315.51	26.5	289.0
KFVR-FM/K	APP 285C3	Rye	CO	151.0	316.80	16.5	300.3
KWRY	CP 285C3	Rye	CO	151.0	316.80	16.5	300.3
KWRY	LIC 285C3	Rye	CO	151.0	316.80	16.5	300.3
KNIV	LIC 284C	Lyman	WY	278.8	361.94	34.5	327.4

-----  
All separation margins include rounding

\* Processing under 73.215 is hereby being proposed towards KRAI-FM and KKXK(FM). See the Technical Statement for more details.

FIGURE 2 - DETAILED CHANNEL INTERFERENCE STUDY

KEZZ(FM) PHIPPSBURG, CO, CH 231C2

REFERENCE 40 27 04.80 N.  
106 45 06.00 W.

CH# 231C2 - 94.1 MHz, Pwr= 0.82 kw, HAAT= 522.9 M, COR= 3140 M  
Average Protected F(50-50)= 39.62 km  
73.215 Omni-directional

DISPLAY DATES  
DATA 09-01-20  
SEARCH 09-01-20

CH CITY	CALL	TYPE ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap	*OUT* in km)
231C2 KEZZ Phippsburg		LIC N__ CO	151.4 331.4	10.61 BLH20090522ACV	40 22 02.90 106 41 30.10	1.750 380	3107	---Reference---	Blizzard Broadcasting II C	
229C1 KRAI-FM Craig		LIC D__ CO	281.1 100.6	73.94 0000105059	40 34 34.80 107 36 31.20	60.000 299	9.4 2315	70.2 11.4	Blizzard Broadcasting, LLC	1.6
231C KKKK Montrose		LIC ____ CO	198.3 17.7	246.82 BLH19961009KC	38 20 15.90 107 38 25.20	100.000 600	193.2 3143	88.7 2.3	Ccr-Montrose IV, LLC	35.5
230A KYSL« Frisco		LIC ____ CO	151.2 331.6	113.28 BLH19940808KA	39 33 21.90 106 06 55.00	0.560 324	34.8 3549	10.0 105.5R	Krystal Broadcasting, Inco	7.8M
234C KRKS-FM« Lafayette		LIC D__ CO	109.1 290.0	126.10 BMLH19981009KC	40 04 18.90 105 21 15.90	100.000 300	3.0 2442	29.7 104.5R	Salem Media Of Colorado, I	21.6M
230A KCWA« Loveland		LIC Z__ CO	87.5 268.5	133.20 BLH20101214ACL	40 29 36.90 105 10 54.90	0.580 319	12.4 2098	8.8 105.5R	Way Media, Inc.	27.7M
232C3 KMAX-FM« Wellington		LIC ____ CO	68.1 249.2	145.85 BLH20021101AAV	40 55 40.90 105 08 37.90	8.700 168	50.0 2131	32.5 116.5R	Townsquare Media Of Ft. Co	29.4M
232C KILO« Colorado Springs		LIC ____ CO	138.9 320.1	249.41 BLH20070426AAL	38 44 43.90 104 51 43.90	79.000 670	116.7 2922	64.6 187.5R	Colorado Springs Radio Bro	61.9M
233C3 KTUN« New Castle		LIC ____ CO	214.3 33.8	118.90 BLH20050603ABU	39 33 55.90 107 32 03.10	25.000 -121	2.3 1935	22.7 55.5R	Alwaysmountaintime, LLC	63.4M
284C1 KKV« Vail		LIC ____ CO	164.0 344.2	94.32 BMLH20031119AII	39 38 04.90 106 26 49.10	100.000 102	46.4 3015	30.7 26.5R	Rocky Mountain Radio Group	67.8M
231C1 KNEB-FM« Scottsbluff		LIC ____ NE	60.6 242.7	293.02 BLH19810904AB	41 42 03.80 103 40 50.80	100.000 207	153.9 1512	57.7 223.5R	Nebraska Rural Radio Assoc	69.5M
228C3 KTND« Aspen		LIC ____ CO	188.1 7.9	127.35 BLH20100816ABF	39 18 55.90 106 57 34.20	21.000 109	2.2 2682	21.8 55.5R	Bs&t Wireless, Inc.	71.9M
232C1 KXRQ« Roosevelt		LIC Z__ UT	272.7 90.8	250.74 BLH19990111KB	40 31 14.80 109 42 27.50	17.500 568	117.9 2650	80.6 157.5R	Uinta Broadcasting, L.C.	93.2M
230C1 KTAK« Riverton		LIC ____ WY	335.8 154.8	277.45 BLH19811221AS	42 43 09.80 108 08 47.30	50.000 290	79.1 2248	52.8 157.5R	Edwards Communications, Lc	120.0M
229C3 KAZY« Cheyenne		LIC ____ WY	65.7 247.0	189.60 BLH20060615AAH	41 08 03.90 104 41 33.80	25.000 35	2.3 1859	22.7 55.5R	Freisland Broadcasting Cor	134.1M
233C KMLD« Casper		LIC ____ WY	7.7 187.9	255.91 BLH19790130AD	42 44 02.80 106 20 02.00	65.000 582	11.0 2542	76.5 104.5R	Mt. Rushmore Broadcasting,	151.4M
285A DKKAR« Wamsutter		VAC ____ WY	323.3 142.5	169.34	41 39 55.85 107 58 13.28	6.000 100	46.4 2176	30.7 14.5R	White Park Broadcasting, I	154.8M
233C0 KMLD« Casper		CP ____ WY	8.1 188.4	257.24 BMPH20180703AAE	42 44 36.90 106 18 33.10	18.000 591	6.4 2539	55.4 88.5R	Mt. Rushmore Broadcasting,	168.7M
285C2 KRRR« Cheyenne		LIC N__ WY	65.7 247.0	189.60 BLH20031125AIV	41 08 03.90 104 41 33.80	25.500 35	46.4 1859	30.7 19.5R	Brahmin Broadcasting Corpo	170.1M
229C2 KSBV« Salida		LIC ____ CO	163.8 344.3	231.55 BLH20020828AAQ	38 26 46.90 106 00 39.00	1.000 830	2.2 3572	59.7 57.5R	Arkansas Valley Broadcasti	174.1M
228C1 KWYX« Casper		LIC ____ WY	8.1 188.4	256.96 BMLH20100607AFR	42 44 27.80 106 18 33.00	3.800 530	3.5 2497	39.4 78.5R	Cochise Broadcasting LLC	178.5M
228C2 KREO« James Town		CP ____ WY	299.0 117.3	247.18 BPH20190422AAY	41 29 49.90 109 20 38.50	8.000 323	4.4 2341	46.2 57.5R	Pilot Butte Broadcasting L	189.7M
228C3 KREO« James Town		LIC ____ WY	299.0 117.3	247.18 BLH20190301ABQ	41 29 49.80 109 20 38.40	2.350 323	2.8 2341	36.2 55.5R	Pilot Butte Broadcasting L	191.7M
284C1 KTRS-FM« Casper		LIC ____ WY	8.1 188.4	257.26 BLH20060927ANT	42 44 36.90 106 18 26.10	18.000 554	46.4 2524	30.7 26.5R	Townsquare Media Casper Li	230.8M
285C1 KRYD« Norwood		LIC ____ CO	208.1 27.2	267.83 BLH20080519AAS	38 18 58.90 108 11 57.20	24.000 512	46.4 3074	30.7 26.5R	Rocky Iii Investments, Inc	241.3M

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	*OUT* in km)
233C3 Merino	KCGC«	LIC ____ CO		87.1 269.5	307.74 BLH20090622ADG	40 31 57.00 103 07 23.80	15.000 124	4.7 1431	45.5 Northeast Colorado	55.5R	252.2M
284C3 Calhan	DKKCS«	VAC ____ CO		127.3 308.9	279.10	38 54 12.97 104 11 17.85	25.000 100	46.4 2023	30.7 United States	16.5R	262.6M
234C3 Beulah	KRYE«	LIC ____ CO		151.0 332.1	325.14 BLH20111101ALK	37 52 40.00 104 57 21.00	18.000 118	2.1 2426	21.0 Greeley Broadcasting Corpo	55.5R	269.6M
228A Alamosa	KALQ-FM«	LIC ____ CO		166.5 347.1	339.74 BLH4443	37 28 20.00 105 51 15.10	2.800 40	1.8 2341	17.8 Wolf Creek Broadcasting, L	54.5R	285.2M
284C1 Sterling	KNNG«	LIC ____ CO		86.1 268.6	315.51 BLH19810402AB	40 34 57.00 103 01 57.70	100.000 198	46.4 1508	30.7 Media Logic LLC	26.5R	289.0M
285C3 Rye	KFVR-FM/K«	APP ____ CO		151.0 332.1	316.80 0000106674	37 56 40.00 104 59 58.00	25.000 55	46.4 2597	30.7 Educational Media Foundati	16.5R	300.3M
285C3 Rye	KWRY«	CP ____ CO		151.0 332.1	316.80 BPH20180202AAX	37 56 40.00 104 59 58.00	25.000 55	46.4 2597	30.7 Educational Media Foundati	16.5R	300.3M
285C3 Rye	KWRY«	LIC ____ CO		151.0 332.1	316.80 BLH20080307ADA	37 56 40.00 104 59 58.00	25.000 55	46.4 2597	30.7 Educational Media Foundati	16.5R	300.3M
284C Lyman	KNIV«	LIC ____ WY		278.8 96.0	361.94 BLH20061025AFS	40 52 15.80 110 59 45.60	89.000 647	46.4 3330	30.7 Aerostar Communications, L	34.5R	327.4M

-----  
Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM  
In & Out distances between contours are shown at closest points. Reference zone= - Zone 2, Co to 3rd adjacent.  
All separation margins (if shown) include rounding.  
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.  
« = Station meets FCC minimum distance spacing for its class.

FIGURE 3 - INTERFERENCE STUDY WITH KRAI-FM  
KEZZ(FM) PHIPPSBURG, CO, CH 231C2

FMCommander Single Allocation Study - 09-01-2020 - NGDC 30 SEC  
KEZZ's Overlaps (In= 11.45 km, Out= 1.56 km)

KEZZ CH 231 C2 73.215 N  
Lat= 40 27 04.80, Lng= 106 45 06.00  
0.82 kW 522.9 m HAAT, 3140 m COR  
Prot.= 60 dBu, Intef.= 100 dBu

KRAI-FM CH 229 C1 DA 0000105059  
Lat= 40 34 34.80, Lng= 107 36 31.20  
60.0 kW 299 m HAAT, 2315 m COR  
Prot.= 60 dBu, Intef.= 100 dBu

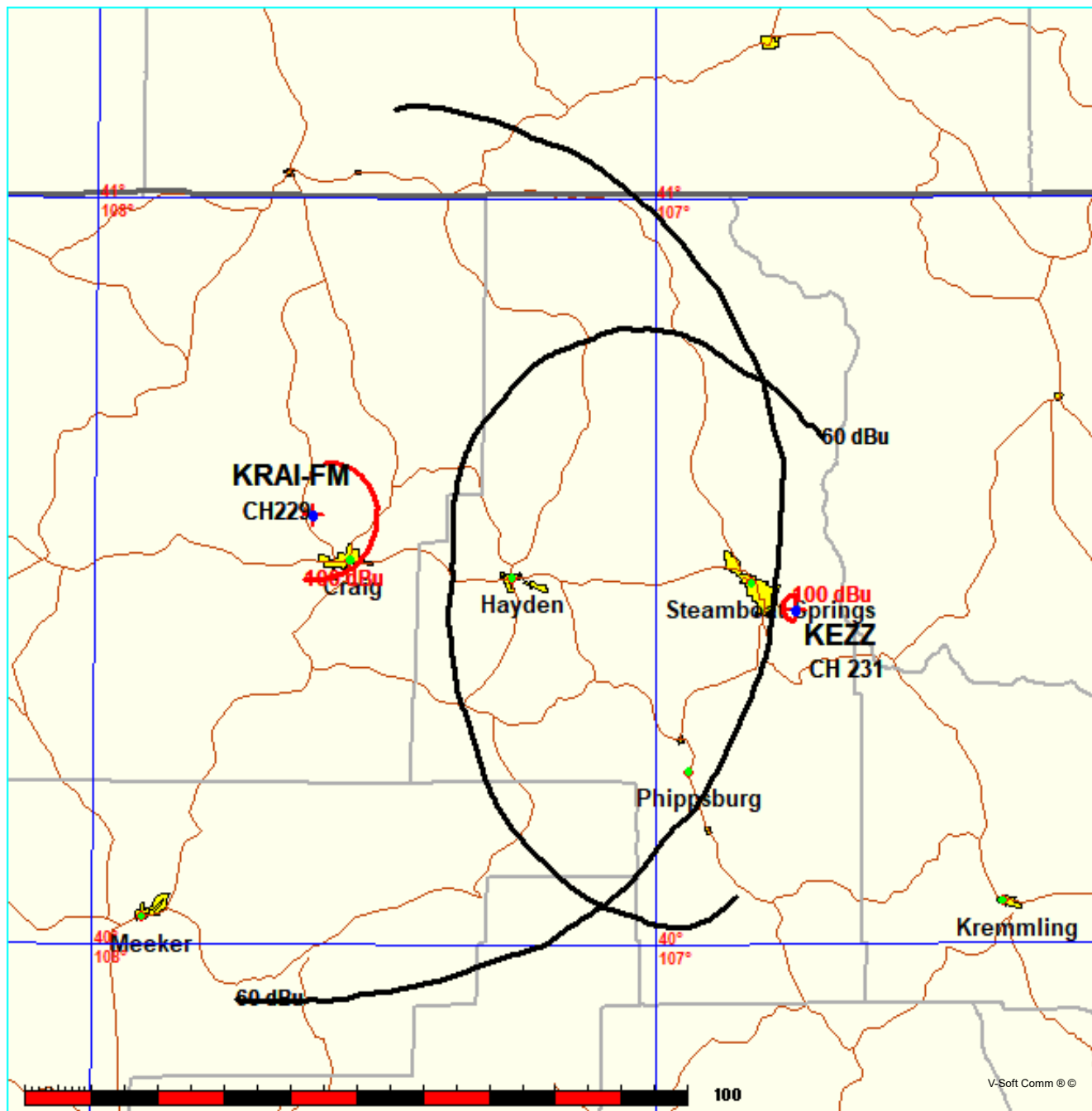


FIGURE 4 - INTEFERENCE STUDY WITH KXKK(FM)  
KEZZ(FM) PHIPPSBURG, CO, CH 231C2

FMCommander Single Allocation Study - 09-01-2020 - NGDC 30 SEC  
KEZZ's Overlaps (In= 2.27 km, Out= 35.53 km)

KEZZ CH 231 C2 73.215 N

Lat= 40 27 04.80, Lng= 106 45 06.00

0.82 kW 522.9 m HAAT, 3140 m COR

Prot.= 60 dBu, Intef.= 40 dBu

KKXK CH 231 C BLH19961009KC

Lat= 38 20 15.90, Lng= 107 38 25.20

100.0 kW 600 m HAAT, 3143 m COR

Prot.= 60 dBu, Intef.= 40 dBu

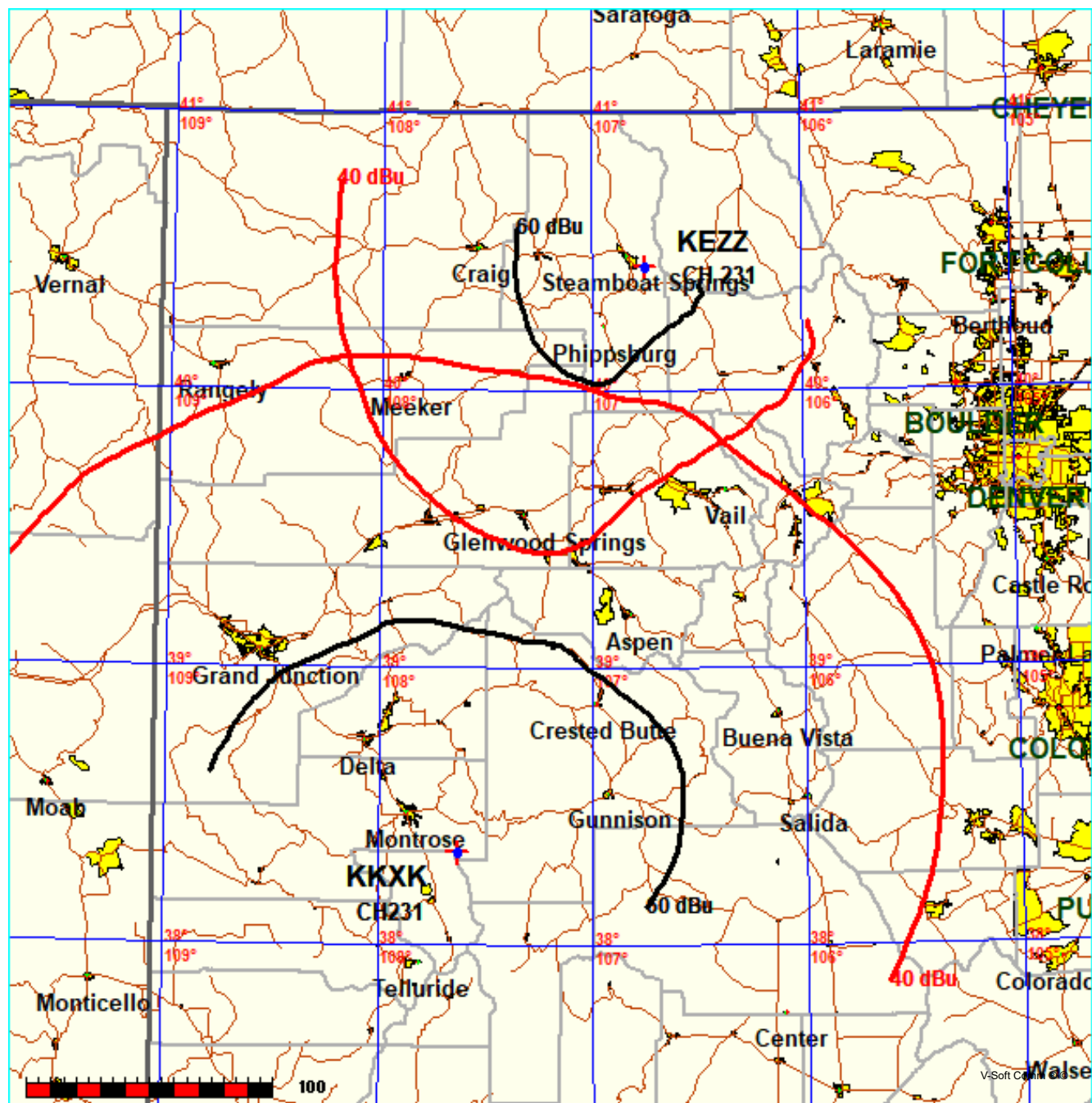


FIGURE 5 - PREDICTED 70 DBU CONTOUR  
KEZZ(FM) PHIPPSBURG, CO, CH 231C2

Coverage Study - NGDC 30 SEC  
09-01-2020

KEZZ CH231 C2, 0.82 kW, 522.9m HAAT, 3140.0m COR AMSL  
Service Contour = 70 dBu.

