

COMPREHENSIVE TECHNICAL EXHIBIT

DISCUSSION

Applicant seeks modification of its current Construction Permit (BMPH-20090121ACC) to relocate full-service KXCD(FM), Fairfield, ID, FID # 164259, to a different tower location with a corresponding change in the CORAMSL, ERP, and antenna pattern.

ANTENNA SITE CITY GRADE COVERAGE

Figures 1&2 below reveals continued 100% 70 dBu city-grade coverage of the City of License (Fairfield, ID).

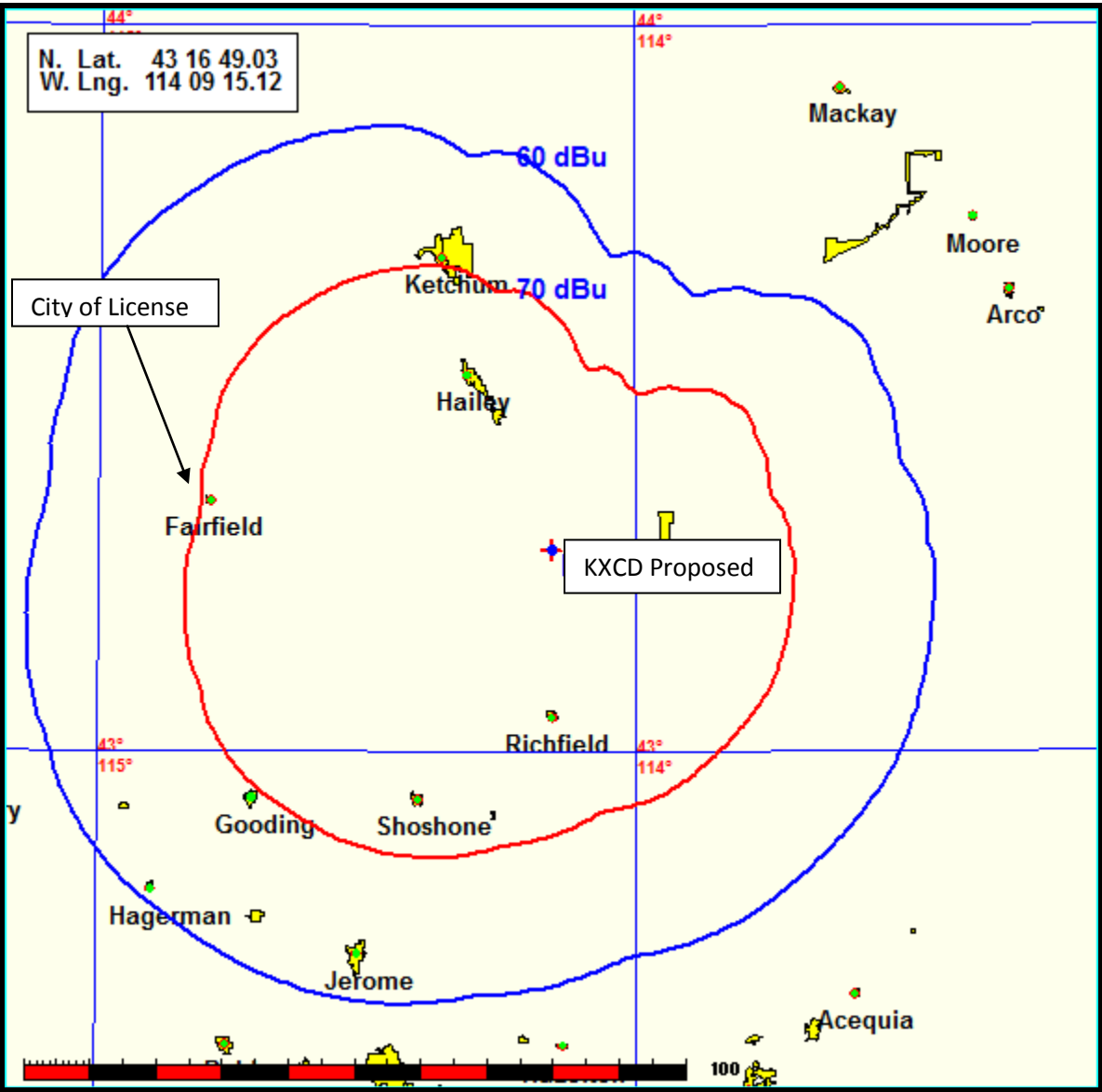


Figure 1

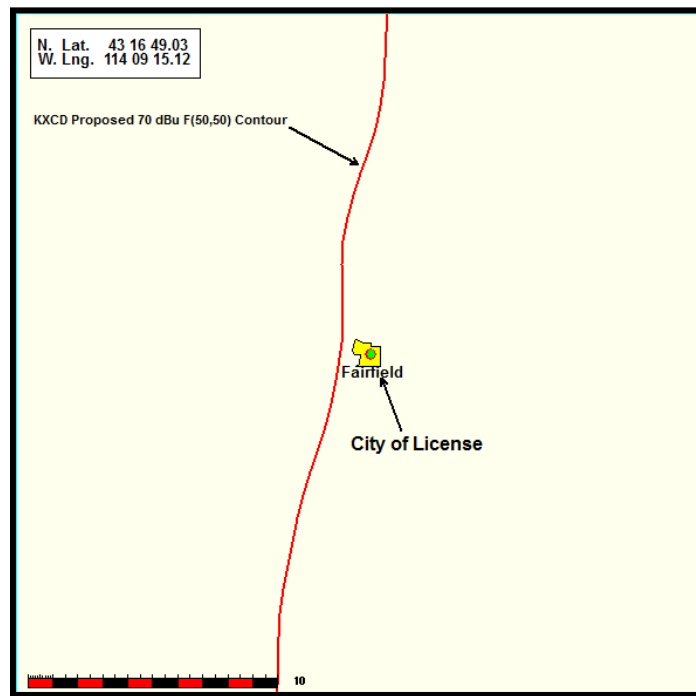


Figure 2

INTERFERENCE STUDY (Requesting Section 73.215 Contour Protection):

Figure 3 is a 73.207 channel spacing study from the proposed KXCD(FM) antenna site noting that the proposed KXCD(FM) antenna site would be short-spaced 5.5 km to co-channel Class C3 KUPY(FM) Sugar City, ID, FID #190386.

REFERENCE		KXCD Move to New Site				DISPLAY DATES	
43 16 49.03 N.		Lee Family Braodcasting, Inc.				DATA 08-19-20	
114 09 15.12 W.		CLASS = C				SEARCH 08-20-20	
		Current Spacings to 3rd Adj.					
		Channel 260 - 99.9 MHz					
Call	Channel	Location		Azi	Dist	FCC	Margin
KXCD CP	260C	Fairfield	ID	268.6	103.96	289.5	-185.5
NOTE: Reference							
KZDX%	LIC	260C	Burley	ID	156.7	114.22	289.5 -175.3
NOTE: Reallocated to Channel 228C at Burley per Report and Order in MB Docket No. 05-243 (see text)							
AL1673%	RSV-A	260C1	Salmon	ID	3.1	207.50	269.5 -62.0
NOTE: Reserved for KXCD per Docket 05-243							
KXCD	LIC	260A	Salmon	ID	6.0	210.87	225.5 -14.6
NOTE: Reference							
KUPY	LIC	260C3	Sugar City	ID	76.5	231.05	236.5 -5.5
KQPI	LIC-N	258C2	Aberdeen	ID	110.6	145.61	104.5 41.1
KCHQ	LIC	261A	Soda Springs	ID	108.1	219.23	164.5 54.7
KQXR	LIC	262C1	Payette	ID	288.5	199.68	104.5 95.2
KLXI	LIC	258C1	Fruitland	ID	287.3	202.74	104.5 98.2

% = Station fails 73.215.

RSV-R = reserved - needs protection, RSV-A = allocation.

All separation margins include rounding

73.215 processing requested

Figure 3

The spacing study indicates an apparent short-spacing to the licensed operation of station KZDX on Channel 260C at Burley, Idaho. However, per the Report and Order in MB Docket No. 05-243¹ that station was reallocated to Channel 228C at Burley. That action is now effective and final, and KZDX holds a construction permit for operation on Channel 228C at Burley (BPH-20110616ACJ granted on 08/30/2011). Per the policy enunciated in Auburn, Alabama, ² no further protection of the KZDX licensed facility on Channel 260C is required. It is understood that the resulting KXCD construction permit (if issued prior to licensing of KZDX on Channel 228C) will bear a condition requiring activation of the new KZDX facility prior to or simultaneous with activation of the proposed KXCD facility.

The applicant requests Section 73.215 contour protection processing. KXCD(FM) is eligible to request 73.215 Contour Protection towards KUPY(FM) as it complies with the minimum separation requirements on its Co-channel at its proposed antenna site. In order to be eligible for 73.215 Contour Protection, the minimum “C to C3” spacing for Co-channel stations must be at least 225.5 kilometers. The proposed KXCD(FM) 260C antenna site satisfies this requirement by 5.55 kilometers (rounded).

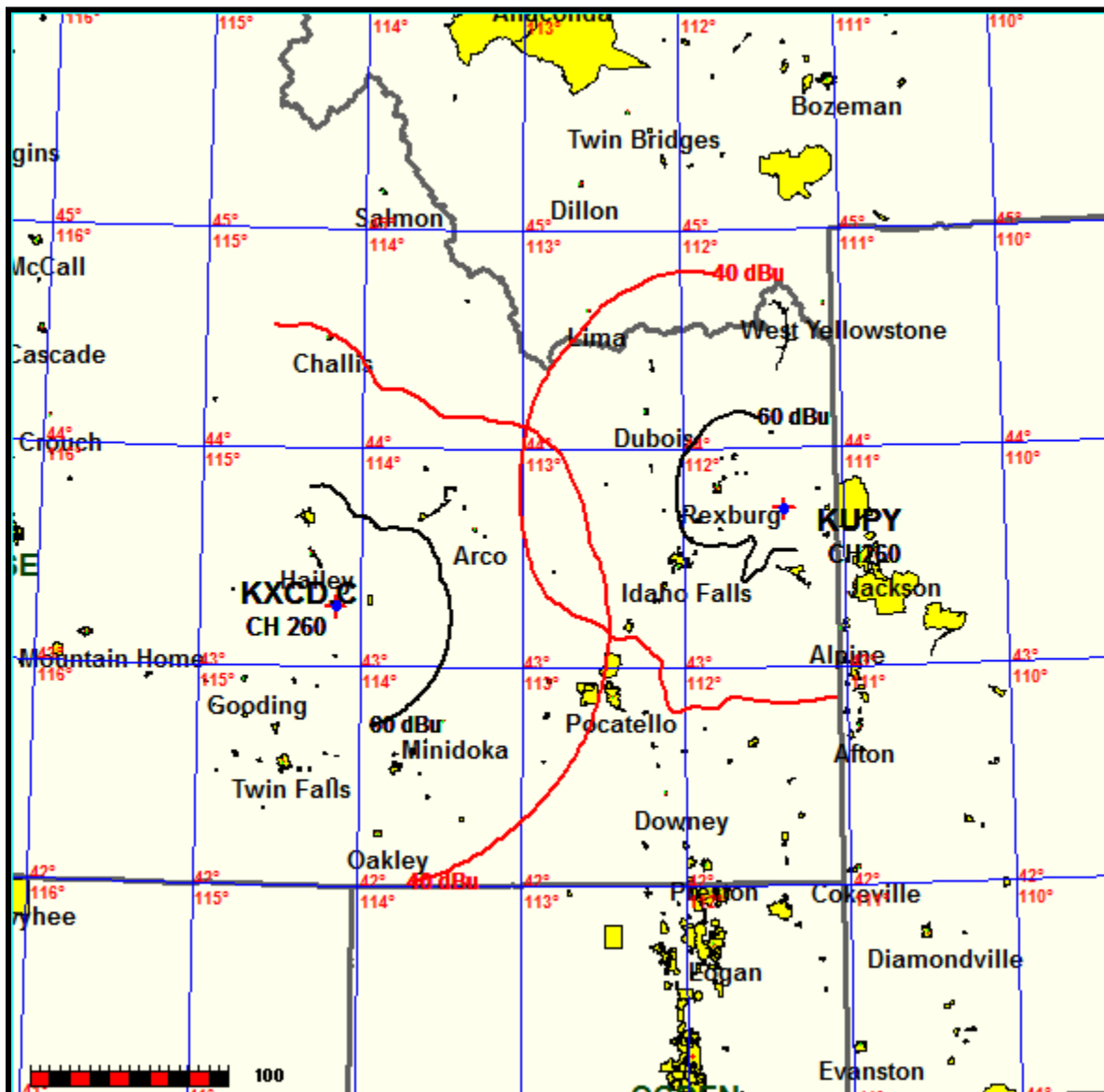
Using the facilities proposed herein, KXCD(FM) 260C complies with the contour protection requirements of Section 73.215 towards KUPY(FM) 260C3, see **Figures 4&5**. The overlap map in **Figure 5** demonstrates that this application complies with the contour protection requirements of Section 73.215. **Figure 5** demonstrates that the proposed KXCD(FM) F(50,50) 60 dBu Protected Contour does not overlap the F(50,10) 40 dBu Interfering Contour of KUPY(FM) operations on Channel 260C3. Likewise, **Figure 5** demonstrates that the F(50,50) 60 dBu Protected Contour for KUPY(FM) does not overlap the proposed F(50,10) 40 dBu Interfering Contour of the instant KXCD(FM) application on 260C. Therefore, it appears as though the instant application meets the requirements of Section 73.215 towards KUPY(FM).

¹ See Meeteetse, Wyoming, Fruita, Colorado, Ashton, Burley, Dubois, Idaho Falls, Pocatello, Rexburg, Shelley, Soda Springs, and Weston, Idaho, Lima, Montana, American Fork, Ballard, Brigham City, Centerville, Delta, Huntington, Kaysville, Logan, Manti, Milford, Naples, Oakley, Orem, Price, Randolph, Roosevelt, Roy, Salina, South Jordan, Spanish Fork, Vernal, Wellington, and Woodruff, Utah, Diamondville, Evanston, Kemmerer, Marbleton, Superior, Thayne, and Wilson, Wyoming, Report and Order in MB Docket No. 05-243, 23 FCC Rcd 447, January 18, 2008.

² See Auburn, Alabama, et al., Memorandum Opinion and Order, 18 FCC Rcd 10333 (MB 2003) (stating that parties may rely on actions taken in earlier rule making proceedings that are effective but not yet final) (“Auburn”).

73.215 Contour Protection Study Lee Family Broadcasting, Inc.											
REFERENCE		CH# 260C - 99.9 MHz, Pwr= 74 kW DA, HAAT= 496.7 M, COR= 2018 M						DISPLAY DATES			
43 16 49.0 N.		Average Protected F(50-50)= 83.5 km						DATA 08-19-20			
114 09 15.1 W.		73.215 Directional						SEARCH 08-20-20			
CH	CALL	TYPE	ANT	AZI.	DIST	LAT.	Pwr(kw)	INT(km)	PRO(km)	*IN*	*OUT*
CITY		STATE		<--	FILE #	LNG.	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)	
260C	KZDX%	LIC		156.7	114.22	42 20 05.60	100.000	216.3	101.7	269.5R	-155.3M
Burley		ID		337.1	BLH20040817AAG	113 36 18.00	600	2389	Lee Family Broadcasting, I		
NOTE: Reallocated to Channel 228C at Burley per Report and Order in MB Docket No. 05-243 (see text)											
260C	KXCD!	CP		268.6	103.96	43 14 58.60	40.000		---	Reference---	
Fairfield		ID		87.7	BMPH20090121ACC	115 26 02.20	708	2268	Lee Family Broadcasting, I		
260C1	AL1673%	RSV-A		3.1	207.50	45 08 41.72	100.000	167.1	69.9	248.5R	-41.0M
Salmon		ID		183.2	RM11340	114 00 39.26	299	2237			
NOTE: Reserved for KXCD per Docket 05-243											
260A	KXCD!	LIC		6.0	210.98	45 10 01.70	0.200		---	Reference---	
Salmon		ID		186.2	BLH20080411AHM	113 52 17.20	-400	1226	Lee Family Broadcasting, I		
260C3	KUPY%	LIC		76.5	230.41	43 43 53.60	25.000	129.8	52.4	35.4	32.3
Sugar City		ID		258.4	BLH20141113AAY	111 21 54.80	100	2187	Frandsen Media Company, LL		
258C2	KQPI«	LIC N		110.6	145.61	42 48 30.60	2.200	3.1	56.8	104.5R	41.1M
Aberdeen		ID		291.7	BLH20080317ABD	112 29 12.90	597	2213	Sandhill Media Group, LLC		
261A	KCHQ«	LIC		108.1	219.23	42 38 29.70	3.000	36.4	21.9	164.5R	54.7M
Soda Springs		ID		289.8	BLH19811229AK	111 36 42.80	-84	1831	Jackson Hole Media LLC		
262C1	KQXR«	LIC		288.5	199.68	43 49 30.60	100.000	6.2	52.8	104.5R	95.2M
Payette		ID		106.9	BMLH20020715AAX	116 30 32.50	216	1047	Lotus Boise Corp.		
258C1	KLXI«	LIC		287.3	202.74	43 47 49.60	100.000	6.9	57.2	104.5R	98.2M
Fruitland		ID		105.7	BLED20190326AAM	116 33 35.50	221	1008	Educational Media Foundati		
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. Call signs with exclamation marks need not be protected.											
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.											
^ = Power and antenna height 'Max classed' as per Sec 73.215 protection requirements											
% = Station Fails minimum 73.215 spacings. 73.215 spacings are used											

Figure 4



KXCD vs KUPY
Figure 5

ENVIRONMENTAL COMPLIANCE:

Downward Radiation Study (Measure Upon Construction)

Due to the fact that several existing and proposed emitters are located at or near the site, the applicant agrees to conduct a Radiofrequency Electromagnetic Field survey at the site upon construction of the proposed facility to ensure that any areas at ground level that exceed the Commission's exposure guideline values are appropriately marked and fenced. The results of the survey will be provided with the application for license. Even though the site will fully comply with the Uncontrolled Site Standards, access to the transmitting site will be restricted and appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency radiation will not exceed the FCC guidelines.

Existing Tower:

The proposed facility is exempt from environmental processing because the facility is not located at a location specified in Section 1.1307(a)(1)-(8) of the Commission's Rules and since the tower in question already exists.