

TECHNICAL STATEMENT
KEZF(FM) GRANTS, NEW MEXICO, CHANNEL 216C2
CEDAR COVE BROADCASTING, INC
MODIFICATION OF CONSTRUCTION PERMIT
APRIL 2021

This Technical Statement is prepared on behalf of Cedar Cove Broadcasting, Inc., licensee of KEZF(FM) Grants, New Mexico, facility ID 172582. KEZF(FM) is proposing to modify its outstanding Constructed Permit (“CP”), 0000106757. KEZF(FM) seeks to relocate to a new existing tower site on the same Mt. Taylor communications site, and increase its ERP to 1.0 kilowatts (1000 watts), with circular polarization, and antenna to increase its center of Radiation Height AMSL to 3355 meters and 824 meters HAAT. KEZF(FM) seeks to equivalent class channel change from 204C2 to 216C2. KEZF(FM) also now is proposing the use of a non-directional antenna system which was proposed in the outstanding CP.

The new operation was evaluated for compliance with all of the Commission technical rules and regulations for Non-Commercial FM broadcast stations.

Compliance with Section 73.509 in regards to interference to other stations was determined as follows:

Figure 1 – Channel Interference Study. Shows compliance with interference contours toward other stations. There is apparent overlap with KQGC(FM) Belen, NM, facility ID 85845, on channel 216C3. However, there is no longer overlap with KQGC(FM) since the licensee of KQGC(FM) failed timely respond to an FCC inquiry letter (see figure 3 attached) requesting its operational status. Thus, this license should

now be cancelled for failure to be operation for more than a 12 month period per Commission rules as specified under Section 312(g).

Figure 2 – Predicted 60 dbμ principle coverage contour for compliance with community coverage.

The application was determined to meet or exceed all of the technical requirements for a FM Non-Commercial Station set for by the Commission.

FIGURE 1 - DETAILED CHANNEL INTERFERENCE STUDY

KEZF(FM) GRANTS, NM, CH. 216C2

REFERENCE CH# 216C2 - 91.1 MHz, Pwr= 1 kw, HAAT= 823.6 M, COR= 3355 M
 35 15 10.00 N. Average Protected F(50-50)= 51.85 km
 107 35 47.70 W. Omni-directional

DISPLAY DATES
 DATA 04-15-21
 SEARCH 04-16-21

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
216C2 Grants	KFCY/KEZF	CP	DCN NM	167.9 347.9	0.06 0000106757	35 15 08.10 107 35 47.20	1.000 820	127.9 3351	53.9	-180.7*	-180.1*
216C3 Belen	KQGC**	LIC	_HN NM	150.6 330.9	109.08 BMLED20090630AFW	34 23 44.20 107 00 44.10	7.000 49	72.0 1724	16.4	-16.7	-41.5**
214C Santa Fe	KQLV	LIC	_CN NM	92.0 272.7	104.38 BLED20090624AEO	35 12 50.20 106 27 03.10	20.000 1261	9.0 3281	95.6	46.6	6.4
218C Albuquerque	KFLQ	LIC	_CN NM	92.0 272.7	104.36 BMLED20121126AQG	35 12 51.10 106 27 04.00	20.000 1232	9.1 3252	95.4	46.6	6.5
215A Zuni	KSHI	LIC	_CN NM	260.8 80.1	110.24 BLED19860407KF	35 05 18.10 108 47 24.20	0.100 -76	8.0 1996	5.6	47.9	24.1
219C3 Gallup	KGLP	LIC	_CN NM	292.0 111.4	105.79 BLED20060126AHR	35 36 13.10 108 40 47.30	0.880 350	1.9 2414	29.0	51.3	73.6
215C3 Farmington	KSJE	LIC	_CN NM	340.9 160.5	169.94 BLED19901108KB	36 41 52.00 108 13 16.30	15.000 119	37.0 1824	20.1	84.2	61.5
217A Houck	KHCK	LIC	_HN AZ	271.8 90.8	150.31 BLED20110822AEV	35 17 01.10 109 14 53.30	0.200 1	13.8 1930	9.9	84.0	62.3
216C2 Truth Or Consequenc	KLCF	LIC	DCN NM	172.3 352.5	255.72 BLED20190225ABC	32 58 04.20 107 13 39.00	1.000 824	124.6 2338	52.0	78.7	77.9
217C2 Ignacio	KSUT	LIC	_CN CO	2.6 182.7	214.53 BLED20100713AGQ	37 11 03.00 107 29 08.20	2.000 497	73.1 2713	47.4	88.6	87.4
269A Rio Rancho	KQTM«	LIC	_CN NM	93.4 274.0	102.65 BLH19860421KB	35 11 35.10 106 28 17.00	3.000 30	46.4 2006	30.7	14.5R	88.2M
216A Las Vegas	KEDP	LIC	_HN NM	79.3 260.7	219.00 BLED20070118AAF	35 35 39.10 105 13 17.00	1.320 -61	39.2 1983	10.9	131.9	89.4
219C3 Fruitland	KTGW	LIC	_CN NM	340.9 160.5	169.75 BLED20190529ABJ	36 41 46.00 108 13 15.30	12.000 116	1.9 1825	19.0	112.5	141.7
215A Arroyo Seco	KRRT	LIC	DHN NM	54.9 236.1	224.82 BLED20120203ABW	36 23 52.10 105 32 38.00	5.100 -186	35.3 2283	22.3	144.1	130.1
217C2 Ruidoso	KKLB	LIC	_CN NM	140.5 321.5	264.42 BLED20140925AFV	33 24 15.40 105 46 56.60	0.500 882	69.0 3308	46.3	141.6	138.1
06 -- Chamita	K06PR-D«	CP	D_N NM	54.4 235.2	163.08 BNPDVL-20090923ABL	36 05 52.19 106 07 21.71	0.300	21.0 2040	1.9	22.9R	140.2M
219C2 Springerville	AL4362	---	---	239.1 57.9	213.31	34 15 06.16 109 35 08.35	50.000 150	8.8 2392	67.8	152.3	143.3
213C3 Dulce	KCIE	APP	DEN NM	16.1 196.5	200.15 0000143026	36 59 01.20 106 58 14.00	0.550 470	1.6 2738	38.3	146.9	159.6
213A Dulce	KCIE	LIC	D_-- NM	16.1 196.5	200.11 BLED19901001KA	36 59 00.00 106 58 14.10	0.100 468	0.7 2757	25.6	147.7	172.3
219A Chama	KYOL	LIC	_CN NM	25.7 206.3	203.48 BLED20120827ABA	36 53 58.00 106 36 08.10	0.220 99	1.0 2667	22.9	152.6	178.1
215C Safford	VA9006	VAC	_N AZ	216.6 35.4	332.16	32 50 00.23 109 42 59.30	100.000 600	125.0 1595	83.6	153.5	168.8
217A Show Low	KSHM	LIC	_CN AZ	248.1 66.6	263.64 BLED20110926AEB	34 20 26.10 110 15 24.40	2.700 75	46.1 2025	30.6	164.1	153.9
217C3 Silver City	KRXG	LIC	_HN NM	192.8 12.4	271.64 BLED20131129AHV	32 51 48.20 108 14 30.10	0.620 432	39.0 2456	25.5	179.8	169.1
216C2 San Carlos	KYAY	LIC	DCN AZ	234.6 53.1	316.34 BLED20120810AAQ	33 34 30.10 110 22 44.30	1.900 515	47.0 2029	14.1	218.1	176.5
213C1 Towaoc	KZET	LIC	_CN CO	334.0 153.2	243.93 BLED20140513AEK	37 13 12.90 108 48 26.30	2.000 873	3.0 2726	62.8	185.5	179.0

CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kw)	INT(km)	PRO(km)	Page # 2	
CITY		STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	*IN*	*OUT*
										(Overlap	in km)
215C2	KSQF	LIC _VN		211.7	306.80	32 53 22.20	0.600	68.5	45.9	184.0	180.8
Thatcher		AZ		30.7	BLD20121121ASL	109 19 25.20	687	1980	Good News Radio Broadcasti		
270C1	KTAO«	LIC _CN		57.2	207.39	36 14 48.10	1.200	46.4	30.7	26.5R	180.9M
Taos		NM		238.3	BLH19990308KD	105 39 17.00	852	3303	Taos Communication Corpora		
269C1	KQAZ«	LIC ZCN		239.1	213.31	34 15 06.10	55.000	46.4	30.7	26.5R	186.8M
Springerville		AZ		57.9	BLH20001114AAB	109 35 08.30	379	2620	wsk Family Credit Shelter		
217C0	KGHR	LIC DHN		291.7	348.34	36 21 26.90	100.000	106.7	73.8	188.5	197.3
Tuba City		AZ		109.6	BLD20060718AAF	111 12 14.50	322	2097	Tuba City High School Boar		
217A	VA8943	VAC _N		193.0	282.49	32 46 12.27	6.000	23.5	15.8	206.1	190.4
Silver City		NM		12.6		108 16 43.17	100	1962			
214C3	KNAA	LIC _CN		238.6	249.61	34 03 42.20	3.000	1.7	15.6	195.7	223.9
Show Low		AZ		57.3	BLD20021121AAL	109 54 24.40	249	2375	Arizona Board Of Regents		
217A	KAWN	LIC _CN		265.8	283.75	35 01 36.10	0.300	10.6	7.4	219.0	196.8
Winslow		AZ		84.0	BLD20100504AAY	110 41 52.50	36	1489	American Family Associatio		
218A	KSJD	LIC _CN		342.0	260.64	37 28 56.90	1.200	2.2	29.7	203.2	226.6
Cortez		CO		161.5	BLD20060810AIL	108 30 36.30	95	2272	Community Radio Project, I		
215A	KASF	LIC _CN		31.4	290.58	37 28 20.00	1.100	14.5	10.4	227.1	207.8
Alamosa		CO		212.5	BLD20010419AAA	105 52 41.10	27	2316	Adams State University		
219C3	KOTO	LIC _CN		356.0	298.17	37 55 59.00	8.900	1.8	17.6	243.0	266.6
Telluride		CO		175.9	BLD20070212BAQ	107 50 01.20	-68	3229	San Miguel Educational Fun		
219C2	KLAG	APP _CN		149.2	311.66	32 49 47.90	1.400	2.6	58.5	255.3	250.8
Alamogordo		NM		330.2	0000143288	105 53 14.10	512	2401	Educational Media Foundati		
219C2	KLAG	LIC _CN		149.2	311.70	32 49 47.30	1.400	2.6	58.4	255.3	250.9
Alamogordo		NM		330.2	BMLED20131107AGU	105 53 11.90	512	2401	Educational Media Foundati		
214A	KLMQ	LIC _HN		353.8	305.75	37 59 29.00	0.100	0.7	19.8	251.3	278.9
Placerville		CO		173.6	BLD20170927ABP	107 58 23.20	456	3365	Educational Media Foundati		
213C	880303MR	VAC _N		125.3	349.77	33 23 47.36	100.000	13.2	90.2	283.8	257.3
Roswell		NM		307.0		104 31 27.88	600	1706			
214C1	KRWG	LIC _CN		170.0	336.97	32 15 33.30	100.000	5.0	45.2	279.3	289.0
Las Cruces		NM		350.4	BMLED20170313AAV	106 58 32.00	103	1432	Regents Of New Mexico Stat		
218A	KRUX	LIC DCN		166.4	338.64	32 16 58.90	1.900	1.6	11.9	284.2	323.6
Las Cruces		NM		346.9	BLD20170809AAE	106 44 51.70	-42	1235	Bd Of Regents, New Mexico		
219A	KGCN	LIC _VN		126.9	343.74	33 21 47.40	3.500	2.1	20.8	288.7	320.3
Roswell		NM		308.5	BLD20090625ACS	104 38 12.90	120	1283	Educational Media Foundati		
214A	KTDL	LIC _CN		54.5	341.02	36 59 33.10	0.450	1.5	27.1	293.4	310.6
Trinidad		CO		236.3	BLD20071115AAB	104 28 26.00	296	2610	Educational Communications		
219A	KCCS	LIC _CN		54.5	341.02	36 59 33.10	0.370	1.3	26.1	293.5	311.7
Starkville		CO		236.3	BLD20080912AAL	104 28 26.00	303	2615	The Colorado College		
219A	KVLP	LIC _CN		90.9	351.12	35 08 23.20	0.570	1.6	13.3	300.8	334.3
Tucumcari		NM		273.2	BLD20090408AMZ	103 44 36.80	95	1371	Educational Media Foundati		
213A	KZTU-FM	LIC _CN		90.2	353.16	35 10 45.90	6.000	1.6	15.8	303.0	335.2
Tucumcari		NM		272.4	BLD20120504ADD	103 43 07.80	24	1275	Iglesia Shekina		
270A	AL4321«	RSV-A _		237.1	355.69	33 28 31.19	6.000	46.4	30.7	14.5R	341.2M
Miami		AZ		55.3	RM11155	110 48 53.39	100	1337	Lazer Licenses, Llc		
270A	KQSS«	LIC NCN		236.1	359.18	33 24 30.20	6.000	46.4	30.7	14.5R	344.7M
Miami		AZ		54.3	BLH20060821ABQ	110 48 16.40	-24	1244	Globecasting, Inc.		

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.

* KEZF CP being modified by this application

** KQGC(FM) Belen, NM, failed to timely respond to an FCC's operational status letter. Hence, this license should be cancelled for failure to be operational for more than a 12 months period of time. See the Technical Statement for more details.

FIGURE 2 - PREDICTED 60 DBU COVERAGE CONTOUR
KEZF(FM) GRANTS, NM, CH. 216C2

Coverage Study - NGDC 30 SEC
04-17-2021

KEZF CH216 C2, 1.0 kW, 823.6m HAAT, 3355.0m COR AMSL
Service Contour = 60 dBu.

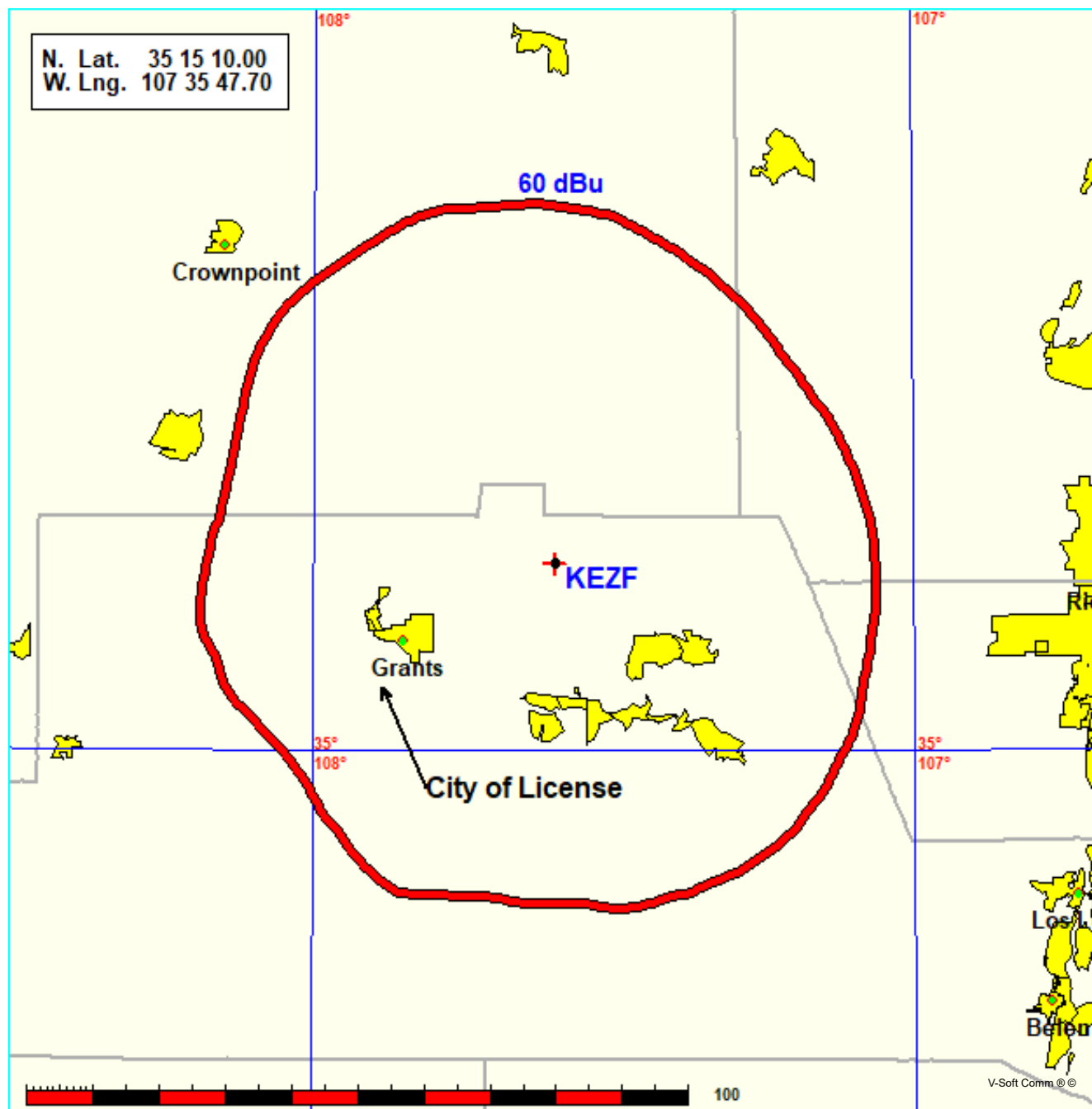




FIGURE 3 - FCC INQUIRY LETTER TO KQGC(FM)

Federal Communications Commission
Washington, D.C. 20554

March 17, 2021

In reply refer to: 1800B3-VM

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Carlos Arana Ministries, Inc.
7842 Grape Street
Highland, CA 92346

Re: KQGC(FM), Belen, NM
Facility ID No. 85845
Operational Status Inquiry

Dear Licensee:

It has come to our attention that Station KQGC(FM), Belen, New Mexico (Station), licensed to Carlos Arana Ministries, Inc. (CAM) may be currently off the air. However, Commission records show that CAM has indicated that the Station is licensed and operating. Pursuant to section 73.1740 of the Commission's Rules, CAM is required to clarify this matter in writing within thirty days of the date of this letter.

On January 10, 2020, we received a complaint from Cedar Cove Broadcasting (CCB).¹ CCB alleges that the Station has not been operational for more than twelve months and that its license should be cancelled.² CCB further states that Mr. Victor Michael, its President and technical consultant sporadically monitored the Station's operation on 91.1 MHz for more than 12 months while travelling from Loveland, Colorado to Phoenix, Arizona.³ Mr. Michael reported that when he was driving through the community of Belen on his travels over that time period, he never heard any broadcasts from the Station's licensed frequency.⁴ CCB also reports that its efforts to contact CAM by mail were unsuccessful, and that it learned that Mr. Carlos Arana, the Director/CEO of CAM, had died several years ago.⁵ In addition, CCB states that pictures of the licensed tower dated May 8, 2018, show that there is no 6-bay antenna as required by the Station's license,⁶ and the tower owner, American Tower, states that the lease was terminated on April 6, 2016.⁷ CCB also states that the Station's FCC Public File web page shows that nothing has been filed by CAM since consummation of the assignment to it on May 7, 2015.⁸

Based on this information, it appears that the Station may have been silent (or failed to operate with authorized facilities) for more than one year. Pursuant to section 312(g) of the Communications Act

¹ See *Request for Cancellation of License; Station KQGC(FM), Belen NM FAC. ID 85845* filed by Cedar Cove Broadcasting, Inc. (Jan. 10, 2020) (CCB Complaint).

² CCB Complaint at 1.

³ *Id.* at 1-2, Exh. 1.

⁴ *Id.* at 2, Exh. 1.

⁵ *Id.* at 3, Exh. 5.

⁶ *Id.* at 3, Exh. 3, Exh. 6.

⁷ *Id.* at 3, Exh. 4.

⁸ *Id.* at 3, Exh. 7.

of 1934, as amended, **if a broadcast station fails to transmit broadcast signals with its authorized facilities for any consecutive 12-month period, then the station license granted for the operation of that broadcast station expires at the end of that period, notwithstanding any provision, term, or condition of the license to the contrary, except that the Commission may extend or reinstate such station license to promote equity and fairness.**⁹

Please provide evidence documenting the Station's operational status since December 22, 2018. This evidence must indicate the location, effective radiated power and antenna height above ground level for **all periods of operation** from December 22, 2018 to the present. Also include copies of all leases, personnel records (including payroll records appropriately redacted to protect the privacy of individual employees), engineering records, and station records, including EAS logs, for that period of time. In addition, you must provide copies of all invoices, bills, checks written or received, credit card charges, wire transfers or deposits of funds relating to the Station's operation.¹⁰ You **must also include pictures** of the Station's studio facilities and transmission facilities during this timeframe, and provide exact Station coordinates.

We also note that it is imperative to the safety of air navigation that any prescribed painting and illumination of the Station's tower shall be maintained.¹¹

All submissions must be addressed to Marlene S. Dortch, Secretary, FCC 45 L Street N.E., Washington, DC, 20554, and **sent via email ONLY**, to Victoria.McCauley@FCC.gov.

Failure to respond to this letter within the specified time will result in adverse actions jeopardizing both the Station's license and call letters. If you have any questions concerning the content of this letter, please contact Victoria McCauley, Attorney, by phone at (202) 418-2136 or via e-mail at the address above.

Sincerely,

Albert Shuldiner

Albert Shuldiner
Chief, Audio Division
Media Bureau

cc (via electronic mail):

Mr. Victor Michael, Cedar Cove Broadcasting, Inc. (vicmichael@aol.com)

⁹ 47 U.S.C. § 312(g). The Commission has exercised its discretion under section 312(g) to extend or reinstate a station's expired license "to promote equity and fairness" only in limited circumstances where a station's failure to transmit a broadcast signals for 12 consecutive months is due to compelling circumstances that were beyond the licensee's control. *See e.g., A-O Broad. Corp.*, Memorandum Opinion and Order, 23 FCC Rcd 603, 617, para. 27 (2008) ("This limited, discretionary provision is phrased as an exception to the general rule that most affected licenses will be forfeited").

¹⁰ In addition, if the Station uses accounting software to maintain financial records, provide printouts of the data recorded for this period.

¹¹ *See* 47 CFR §§ 17.6 and 73.1740(a)(4).