

## Engineering Standards and Assignment Compliance

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On November 5, 2018, the Audio Division granted KUBT(FM) a Construction Permit (FCC File No. BPH-20180921AAZ) which authorized a transmitter site change to an existing tower (ASR 1031769) and a one-step upgrade to a Class C facility. It was recently discovered that the 2018 Construction Permit specifies the wrong tower on Palikea Ridge. Accordingly, the Applicant will surrender the 2018 Construction Permit, which is set to expire on November 5, 2021, and submits the instant application to correct the planned KUBT(FM) tower location to ASR 1218023. The instant proposal requests a -6.4 second correction in the Latitude and a +4.1 second correction in the Longitude in comparison to 2018 CP coordinates. Therefore, the coordinate correction requested herein results in a 0.21 km change in the authorized transmitter site location. Further, the KUBT(FM) antenna heights proposed herein conform with the data on file for the stations that share the master antenna on ASR 1218023.

- Community of License Coverage Requirements 47 C.F.R. Section 73.315

Attached as Exhibit 1 is a map which depicts the proposed 3.16 mV/m (70 dBu) F(50,50) principal community coverage contour. As illustrated in Exhibit 1, the proposed principal community coverage contour covers the entire community of license. Therefore, the instant proposal is compliant with Section 73.315 of the FCC Rules.

- Spacing Requirements 47 CFR Section 73.207 and Assignment Compliance

The transmitter site specified herein remains fully-spaced under Section 73.207 of the FCC Rules with all pertinent co-channel, adjacent-channel and I.F.-related full service allotments, assignments and applications. By virtue of the grant of the 2018 one-step upgrade application discussed above, the KUBT(FM) Honolulu, HI, FM assignment has been modified to add Channel 230C and delete Channel 230C1. Further, pursuant to Section 316(a) of the Communication Act of 1934, as amended, the KUBT(FM) FCC License, File No. BMLH-20040624ACU, has been modified to specify operation on Channel 230C in lieu of Channel 230C1. Therefore, the instant application is a routine minor change application for KUBT(FM) on its assigned Channel 230C (i.e. the instant proposal is not a one-step upgrade application).

Accordingly, the instant proposal satisfies all applicable allotment and city-grade coverage requirements.