

**Engineering Exhibit For  
Santa Barbara Broadcasting, Inc.  
K245DD  
Santa Barbara, California  
October 2021**

**Special Operating Condition Responses**

Construction permit BNPFT-20180425AAV contains five special operating conditions, all of which are met. One requires a specific response:

2 The AM station identified below may be affected by the facilities authorized by this construction permit. Pursuant to Section 1.30004 of the Commission's Rules, at least 30 days prior to commencement of construction of the facilities authorized herein, the permittee must provide notification of the construction to the AM station licensee. As part of this notification, the permittee must examine the potential impact of the construction of the authorized facilities on the AM station using a moment method analysis. The analysis shall consist of a model of the AM antenna together with the potential re-radiating tower in a lossless environment. The model shall employ the methodology specified in Section 73.151(c) of the Commission's Rules, except that the AM antenna elements may be modeled as a series of thin wires driven to produce the required radiation pattern, without any requirement for measurement of tower impedances. If the AM station was authorized pursuant to a directional proof of performance based on field strength measurements, the permittee may, in lieu of the moment method analysis, demonstrate with measurements taken before and after construction that field strength values at the monitoring points do not exceed the licensed values. If the construction results in radiation values in excess of the AM station's licensed standard pattern or augmented pattern values, the permittee is responsible for the installation and maintenance of any detuning apparatus necessary to restore proper operation of the directional antenna. (See Section 1.30002 of the Commission's Rules.) The permittee must submit confirmation of completion of these notice and analysis requirements in the application for license to cover this construction permit. If the facilities authorized by this Construction Permit do not result in a significant modification of the existing tower specified as defined in Section 1.30002(d) of the Commission's Rules, the permittee shall submit a certification and any necessary evidence supporting that certification in the Application for License.

Station KTMS(AM), Santa Barbara, CA, 990 kHz

The tower is that specified in construction permit BNPFT-20180424AAV is a wooden pole at an established communications site, part of a larger wooden structure. It is approximately 500.4 meters (594.5° at 990 KHz) at 192° true from the southernmost KTMS tower, which is closest to this site. The antenna and 6.1 meters of transmission line will be mounted to that pole. The added metal elements are 7.25 electrical degrees tall at 990 KHz.



Section §1.30002(b) requires an analysis if “construction or significant modification of a tower” is within ten wavelengths of a directional AM antenna and is taller than 36 electrical degrees at the directional AM station frequency. The subject tower is 1.65 wavelengths distant but only 7.25 degrees tall and as such “is presumed to have no significant effect” on KTMS per §1.30002(g).

Furthermore, section §1.30002(e) states “[t]he addition or modification of an antenna or antenna-supporting structure on a building shall be considered a construction or modification subject to the analysis and notice requirements of this subpart if and only if the height of the antenna-supporting structure alone exceeds the thresholds in paragraphs (a) and (b) of this section.” The antenna-supporting structure here does not exceed 36° and is not being increased in height. Therefore the addition of the K245DD antenna qualifies as not being subject to the analysis and notice requirements of this subpart under this section.