TECHNICAL STATEMENT K293DA SEDONA, ARIZONA, CH. 293D TABBACK BROADCASTING CO., INC. MINOR MODIFICATION OF LICENSE APRIL 2022

This Technical Statement is made in support of a minor modification of FM translator station, K293DA at Sedona, Arizona, facility ID 202336, license # 0000168319. K293DA seeks to relocate to an adjacent existing tower site, FCC registration number 1003531, and remain a "fill-in" translator for KAZK(AM) Sedona, Arizona, facility ID 64494. K293DA seeks to make some minor technical changes to relocate the proposed transmitter site from the adajacent 11 meter tall monopole currently used for a remote pickup antenna at the KAZM(AM) transmitter site, to the formerly utilized Tower # 2 of the KAZM(AM) night directional array. KAZM(AM) was recently granted a Construction Permit ("CP"), BP-20211208AAB, which basically modified KAZM(AM) to specify a non-directional operation during the daytime and night operation. Thus, eliminating KAZM(AM)'s former directional antenna operation. A license application to cover that CP is now pending with the Commission, BL-20220412AAD. Thus, the former night directional tower #2 which has a separate ASR from the non-directional tower #1 now utilized by KAZM(AM) has been grounded and is proposed to be utilized by K293DA. An increase its ERP to 0.17 kilowatts (170 watts) Effective Radiated Power, with an antenna height to 1334 meters AMSL. The following will show that the new proposed operation of K293DA will meet all the Commissions technical requirements for an FM translator station.

The new proposed operation of K293DA is proposing the use of a Nicom model BKG-88/2L 2 bay, directional antenna system with dual polarization and three quarter wavelength spacing (0.75) between the two bays. The antenna will be mounted on an existing registered tower, # 1003531. The tower has an overall height of 57.0 meters above the ground. The antenna will be mounted with a Center of Radiation of 53.8 meters above the ground, and 1334 meters Above Mean Sea Level. The coordinates of this tower are located at N 34° 51' 39.0", W 111° 49' 13.0", NAD 83.

Figure 1 is a detailed interference study conducted on channel 293D with these new proposed facilities. It shows that the new operation of K293DA will not cause any interference to any existing or proposed FM stations on any of the pertinent same channel or adjacent channels to channel 293 with the exception of second adjacent channel station, KFSZ(AM) Munds Park, Arizona, facility ID 164209, operating on channel 291C2.

The proposed operation of K293DA on 293D is located within the protected 60 dBμ contour of 2nd adjacent channel of KFSZ(FM). Figure 2 shows the predicted F(50-50) field strength of KFSZ(FM) at the proposed K293DA transmitter site is 72.2 dBμ. Therefore, the respective predicted interfering contour F(50-10) generated by the proposed K293DA on channel 293D is an additional 40 dBμ or 112.2 dBμ.

Figure 3 shows the coverage area for the worse case $112.2 \text{ dB}\mu$ interference contour F(50-10) and shows that there is no population in the area of interference.

Figure 4 is a Vertical Pattern study for the proposed K293DA. It documents the proposed operation of K293DA with the proposed Nicom BKG88/2L with three quarter wavelength spacing vertical pattern and the distances to the 112.2 dBμ contour.

The applicant, Tabback Broadcasting Co., Inc.., respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference. There are no homes immediately nearby the proposed existing tower site which is a 20 acre privately owned open field utilized by the relatively large former two tower directional tower array. Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K293DA until such interference can be eliminated.

Figure 5 is a more detailed contour overlap study with a pending application for K296GN Prescott Valley, AZ, facility ID 156453, file number 0000135242, proposing operation on channel 283D.

Figure 6 is the proposed directional antenna data for K293DA.

Figure 7 shows the present and proposed 60 dBµ contours of K293DA. It documents that the two facilities will overlap as required.

The proposed operation of K293DA Sedona, Arizona will remain a "Fill-In" operation for KAZK(AM) Sedona, Arizona. Figure 8 shows that the proposed 60 dBμ contour for the proposed K293DA and the currently licensed daytime 2.0 mv/m contour for KAZM(AM). The proposed 60 dBμ contour will not extend beyond the 2 mv/m daytime contour of KAZM(AM) at any point.

It was determined that the new proposed operation of K293DA Sedona, Arizona on channel 293D, will satisfy all the required commission rules and regulations for an FM translator station.

FIGURE 1 - DETAILED CHANNEL INTERFERENCE STUDY, CH. 293D

K293DA Sedona, AZ, ch. 293D

CH# 293D - 106.5 MHz, Pwr= 0.17 kw DA, HAAT= -142.1 M, COR= 1334 M DISPLAY DATES

Average Protected F(50-50)= 6.44 km DATA 04-23-22

Standard Directional SEARCH 04-23-22 REFERENCE 34 51 39.00 N. 111 49 13.00 W.

111 49 13.00 W.			Standar	d Directional			SEARCH 04-23-22
CH CALL	TYPE ANT	AZI	DIST	LAT	PWR(kW) I		PRO(km) *IN* *OUT*
CITY	STATE	<	FILE #	LNG	HAAT(M) C		LICENSEE (Overlap in km)
293C1 DKLFZ	VAC	36.4	104.56	35 37 00.00	100.000	176.8	74.9 -78.2* 7.9
Leupp	AZ	216.8		111 08 02.51	299	1741	From CDBS
291C2 KFSZ *	LIC _CN	67.1	30.86	34 58 06.10	4.300	4.1	56.7 20.4 -26.7*
Munds Park	AZ	247.3	BLH20080219BFC	111 30 31.50	468	2646	Southwest Media, Inc.
293D K293DA Sedona	LIC _CN AZ	50.0 230.0	0.05 0000168319	34 51 40.10 111 49 11.40	0.001	1363	Reference Tabback Broadcasting Co.,
294C2 KPPV	LIC _CN	237.9	77.25	34 29 25.10	3.700	76.8	50.8 -8.6 13.5
Prescott Valley	AZ	57.5	ВLH19930204КВ	112 32 02.60	493	2181	Prescott Valley Broadcasti
294C2 KPPV Prescott Valley	RUL AZ	237.9 57.5	77.25	34 29 25.10 112 32 02.60	50.000 150	74.8 1836	48.9 -6.5 13.8
293D K296GN Prescott Valley	APP DVN AZ	234.7 54.6	33.33 0000135242	34 41 14.80 112 07 03.70	0.099	18.4 2363	2.1 5.2 0.3 Itm, LLC
240C0 KKLD	LIC NCN	234.6	33.40	34 41 12.10	21.000	85.6	30.7 24.5R 8.9M
Cottonwood	AZ	54.5	BMLH20100428AEO	112 07 04.60	799	2388	Yavapai Broadcasting Corpo
294D KPPV-FM2	LIC DVN	236.9	32.58	34 42 02.30	0.100	5.2	2.8 17.7 17.0
Prescott Valley	AZ	56.7	BLFTB20120525AAF	112 07 07.00		2389	Prescott Valley Broadcasti
295C2 KPPV Prescott Valley	RUL AZ	237.9 57.5	77.25	34 29 25.10 112 32 02.60	50.000 150	5.1 1836	48.9 62.5 23.2
295C2 R17780 Prescott Valley	RSV-R AZ	237.9 57.5	77.25	34 29 25.08 112 32 02.61	50.000 150	5.1 1836	48.9 62.5 23.2 From CDBS
296D K296GN Prescott Valley	LIC DVN AZ	234.7 54.6	33.32 BLFT20150612AAD	34 41 15.10 112 07 03.60	0.250	0.0 2363	4.1 23.5 28.7 Itm, LLC
295C2 KPPV	CP _CN	237.9	77.26	34 29 24.20	4.000	3.9	51.1 63.6 24.2
Prescott Valley	AZ	57.5	0000124846	112 32 02.00	483	2174	Prescott Valley Broadcasti
292C2 KOMR	LIC _CN	211.1	117.13	33 57 21.10	23.000	64.9	42.2 42.5 56.8
Sun City	AZ	30.7	ВLH19961025КС	112 28 36.60	221	1098	Univision Radio Stations G
295A R23032 Star Valley	RUL AZ	142.7 323.0	87.94	34 13 47.10 111 14 25.50	6.000 100	2.6 1591	25.7 75.9 59.8
294CO KNKI Pinetop	RSV-A	115.9 297.1	207.96	34 01 36.17 109 47 37.35	100.000 450	139.3 2776	93.5 61.3 104.7 From CDBS
294D K294AN	LIC DVN	137.8	85.73	34 17 17.10	0.012	13.5	9.5 63.1 66.1 Family Life Broadcasting,
Payson	AZ	318.1	BLFT19950920TA	111 11 34.40	306	1952	
291D K291AL	LIC _CN	237.9	77.25	34 29 24.10	0.010	0.2	12.3 67.3 64.2
Prescott	AZ	57.5	BLFT20070402KSB	112 32 01.60	483	2175	Arizona Board Of Regents F
294C1 KNKI	LIC _CN	107.7	215.94	34 15 06.10	65.000	124.1	83.5 85.5 122.7
Pinetop	AZ	288.9	BLH20100426AAU	109 35 08.30	357	2600	Wsk Family Credit Shelter
290C2 KHOT-FM	LIC ZCN		141.31	33 35 16.10	36.000	2.5	24.6 129.9 101.3
Paradise Valley	AZ		ВLH19981216КВ	111 45 40.50	176	688	Univision Radio Stations G
293A AL8990 Salome	RSV-A AZ	234.5 53.5	203.64	33 47 04.10 113 36 45.75	6.000 100	90.5 709	31.1 103.3 141.3 From CDBS
294C3 AL9806 Buckeye	AZ	200.5 20.1	185.87	33 17 23.16 112 31 14.57	25.000 100	66.9 412	44.6 108.7 130.3 From CDBS
296C3 KVVA-FM	LIC _CN	173.4	158.03	33 26 44.10	17.000	3.8	37.6 145.0 118.8
Apache Junction	AZ	353.5	BLH20130315ABB	111 37 21.40	124	651	Entravision Holdings, LLC
296C2 KVVA-FM	CP NCN	187.6	170.91	33 20 00.20	2.050	2.9	49.1 158.5 121.4
Sun Lakes	AZ	7.5	ВРН20190723ААО	112 03 51.50	508	880	Entravision Holdings, LLC
290D KHOT-FM1	LIC DEN	188.5	158.11	33 27 03.20	7.000	3.0	30.8 145.6 126.0
Glendale	AZ	8.4	BLFTB20030318AHA	112 04 22.50		490	Univision Radio Stations G

Terrain database is GLOBE 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= West Zone, 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.
Reference station has protected zone issue: AM tower
*No acutual interference will be caused to KFSZ since the 112.2 dBu contour will not cover any population.

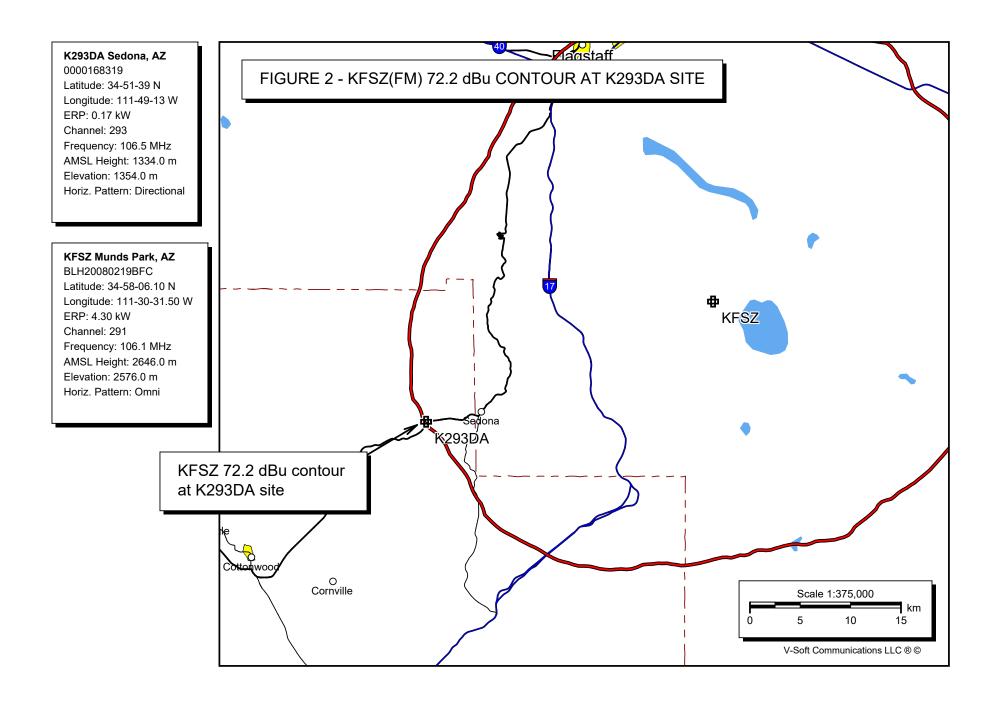


FIGURE 3 - PREDICTED 112.2 DBU CONTOUR K293DA Sedona, AZ, ch. 293D

Coverage Study - GLOBE 30 Sec 04-23-2022

K293DA CH293 D , 0.17 kW, -142.1m HAAT, 1334.0m COR AMSL Interference Contour = 112.2 dBu. Population = 0

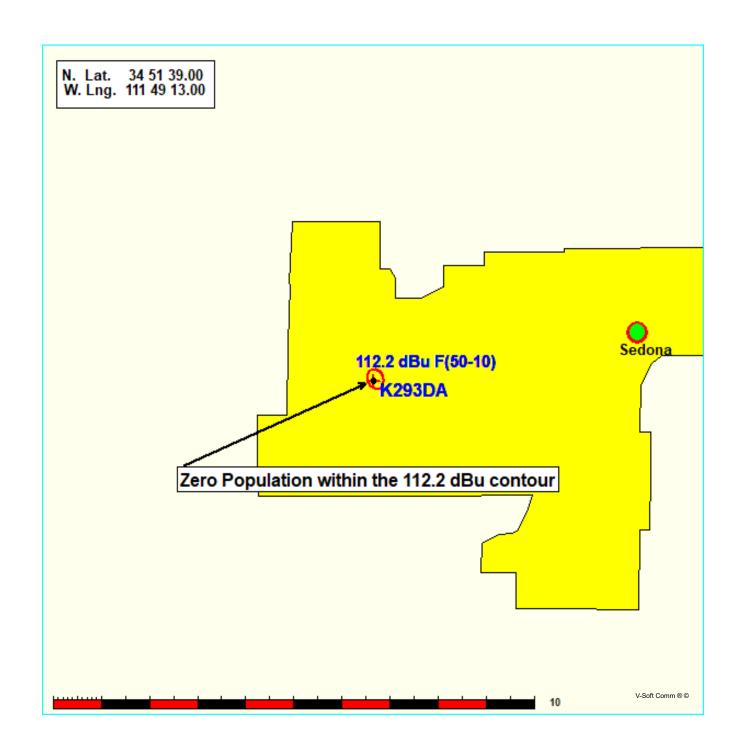


FIGURE 4 - VERTICAL PATTERN STUDY

K293DA Sedona, AZ, Showing Protection to KFSZ , Channel: 291 Geographic Coordinates: N. 34 51 39.00 W. 111 49 13.00 74.1204(d) Study - Using GLOBE 30 Terrain Database Translator or LPFM Maximum Licensed ERP = 0.17 kW, Channel: 293 Translator or LPFM Antenna Height AG = 53.8 meters K293DA Antenna Azimuth Model = Vertical Model Name = BKG88 2 bay 0.75 spacing

Protected Station's Contour = 72.17453 dBu Translator's or LPFM's full Interference contour 112.17453

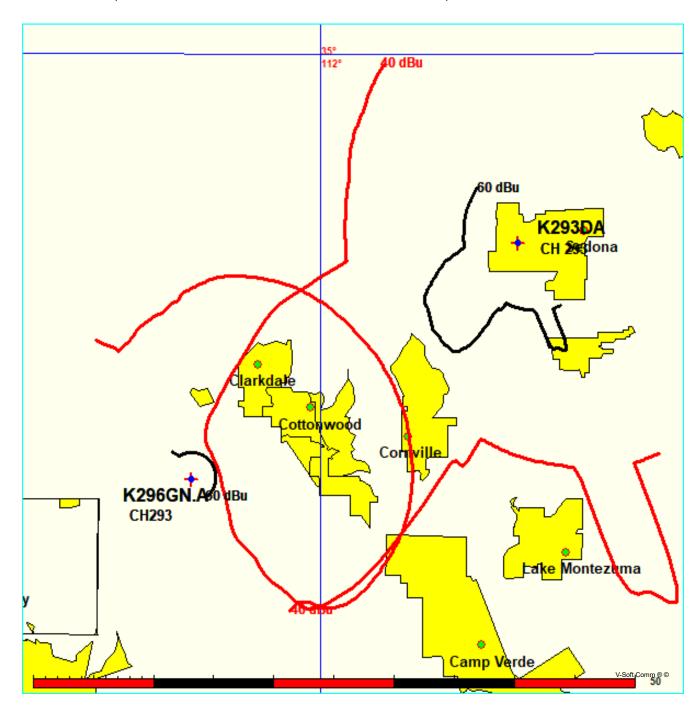
Review Azimuth = 0 Degrees True Horizontal Relative Field at Review Azimuth = 0.966 Translator/LPFM ERP on the horizontal at Review Azimuth = 0.159 kW Distance between stations = 30.8 km Protected Station= KFSZ, 4.3 kW, 2646 M meters COR AMSL

Depression Angle From	Vertical Relative	Horizontal Relative	ERP (kw)	Dist to IX Contour Along	Dist to IX Contour From	Height IX Above
Degree (Deg)	Field	Field		Dep. Angle(m)	Tower Base(m)	Ground (m)
00.00	1.0	0.97	0.1642	223.8652	223.8652	053.800
05.00	0.98	0.97	0.1577	219.3879	218.5530	034.679
10.00	0.95	0.97	0.1482	212.6719	209.4409	016.870
15.00	0.895	0.97	0.1315	200.3593	193.5322	001.943
20.00	0.82	0.97	0.1104	183.5694	172.4988	-008.984
25.00	0.735	0.97	0.0887	164.5409	149.1247	-015.738
30.00	0.645	0.97	0.0683	144.3930	125.0480	-018.397
35.00	0.563	0.97	0.0520	125.9242	103.1510	-018.427
40.00	0.47	0.97	0.0363	105.2166	080.6006	-013.832
45.00	0.36	0.97	0.0213	080.5915	056.9868	-003.187
50.00	0.25	0.97	0.0103	055.9663	035.9744	010.927
55.00	0.155	0.97	0.0039	034.6991	019.9026	025.376
60.00	0.085	0.97	0.0012	019.0285	009.5143	037.321
65.00	0.045	0.97	0.0003	010.0739	004.2574	044.670
70.00	0.02	0.97	0.0001	004.4773	001.5313	049.593
75.00	0.01	0.97	0.0000	002.2387	000.5794	051.638
80.00	0.01	0.97	0.0000	002.2387	000.3887	051.595
85.00	0.01	0.97	0.0000	002.2387	000.1951	051.570
90.00	0.01	0.97	0.0000	002.2387	000.0000	051.561

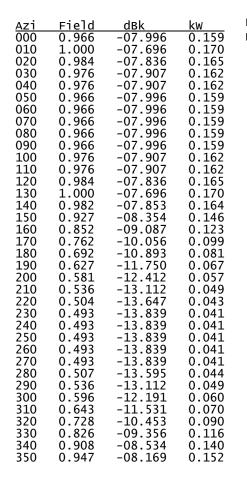
FIGURE 5 - CONTOUR STUDY WITH K296GN (ch. 293A) app. K293DA Sedona, AZ, ch. 293D

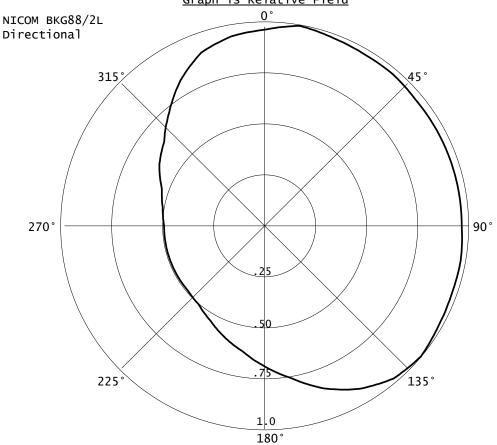
FMCommander Single Allocation Study - 04-23-2022 - GLOBE 30 Sec K293DA's Overlaps (In= 5.17 km, Out= 0.34 km)

K293DA CH 293 D DA Lat= 34 51 39.00, Lng= 111 49 13.00 0.17 kW -142.1 m HAAT, 1334 m COR Prot.= 60 dBu, Intef.= 40 dBu K296GN CH 293 D DA 0000135242 Lat= 34 41 14.80, Lng= 112 07 03.70 0.099 kW 0 m HAAT, 2363 m COR Prot.= 60 dBu, Intef.= 40 dBu









Coverage Study - GLOBE 30 Sec 04-23-2022

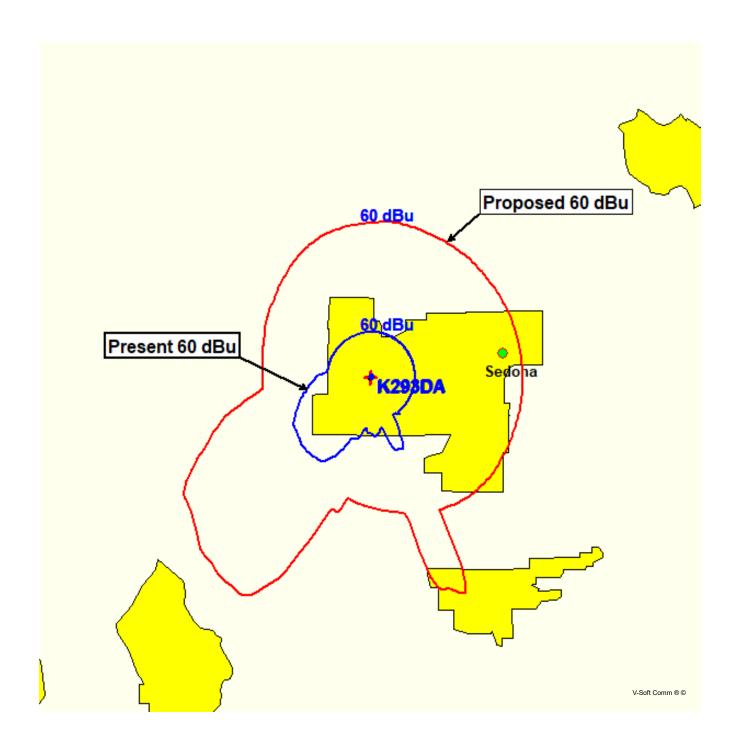


FIGURE 8 - FILL-IN MAP WITH KAZM(AM) K293DA Sedona, AZ, ch. 293D

Coverage Study - GLOBE 30 Sec 04-23-2022

K293DA CH293 D , 0.17 kW, -142.1m HAAT, 1334.0m COR AMSL Service Contour = $60~\mathrm{dBu}$.

