

**Call letters:** KXRU-LP (FM)  
**City of License:** Portland, OR  
**Channel:** CH288L1 (105.5 MHz)  
**File No:** Minor Construction Permit Modification  
of LMS-0000093014  
**Facility ID:** 193303  
**Applicant:** Portland Russian Media Center

## **Explanation of LPFM Waiver Request(s), Schedule 318 Form Issues and Expedited Processing Request**

### **Waiver Request of 47 C.F.R. Section 73.811(a)**

A waiver of 47 C.F.R. Section 73.811(a) is respectfully requested concerning use of the Globe 1 km terrain database for calculation of the HAAT value. Pursuant to the procedures as detailed in 47 C.F.R. Section 73.313(d), an HAAT value of 83 meters is returned utilizing the Globe 1 km terrain database. This calculated HAAT value results in an operational power of 13 watts ERP. A copy of the proposed HAAT calculation has been included in Exhibit 5 of the master engineering packet.

### **Waiver Request of 47 C.F.R. Section 73.807(e)(1)**

A waiver of 47 C.F.R. Section 73.807(e)(1) for second adjacent channel given interference is respectfully requested toward KRSK(FM) - Molalla, OR (CH286C1) and KFBW(FM) - Vancouver, WA (CH290C1) as included in Exhibit 8 of the master engineering packet. Protection of the worst case calculated 128.2 dBμ F(50:10) Interference Contour, corresponding to the worst case calculated 88.2 dBμ F(50:50) Protected Contour, has been demonstrated through a downward radiation study. Full protection will be afforded all concerns as this area will not reach the ground nor a seven meter artificial plane representing a standard two story house when taking into account the downward radiation characteristics of the antenna as supplied by the antenna manufacturer. A copy of the manufacturer's antenna specifications has been included in Exhibit 9.

### **Schedule 318 Form Issues**

Due to limitations within the LMS Schedule 318 Form, the 47 C.F.R. Section 73.811(a) requested 83 meter HAAT value and 13 watts ERP values cannot be manually entered. Therefore, the applicant respectfully requests the Commission enter these corrected values internally. Documentation regarding the waiver request of 47 C.F.R. Section 73.811(a) for use of the Globe 1 km terrain database for calculation of the 83 meter HAAT value and operational power of 13 watts ERP has been previously noted.

### **Expedited Processing Request**

The applicant would like to request expedited processing for this Minor Construction Permit Modification of LMS-0000093014. In this instance, the applicant will be losing access to the licensed tower site as of June 1, 2022. Therefore, an expeditious grant of this application will serve the public by minimizing the need for KXRU-LP(FM) Silent Authority.