

MINOR CP MODIFICATION APPLICATION
K223AJ, CP modification, Correction of Coordinates, AMSL Height, AGL Height

August 2, 2022

TECHNICAL STATEMENT

This technical statement and attached exhibits have been prepared on behalf of the UNIVERSITY OF SOUTHERN CALIFORNIA, licensee of K223AJ, Ukiah-Lakeport, CA (Facility ID 27945). It was determined after the CP was received that there were additional errors in the coordinates, AMSL height, and the antenna AGL. It was found that the tower is not the one with an ASR, it is one immediately next to that tower and it was also confirmed that the translator is combined with another translator, K267BA. K223AJ will continue to operate as a translator for KOSC (FM), Facility ID 27946.

Facilities Proposed

Location (NAD83)	39° 07' 50.6" N Latitude, 123° 04' 36.6" W Longitude
Channel	223D (92.5MHz)
Tower Overall AGL Height-	26.2m (86ft)
Tower ASR	NONE- See Attached Survey
Proposed Antenna	Existing Non-directional (ERI LPX-1E)
Antenna AGL Height-	24m
Site AMSL Height-	1084.5m (3558ft)
COR AMSL Height	1108.5m
ERP	10w

Interference Study

ComStudy 2.2 search of channel 223 (92.5 MHz Class D) at 39-07-50.6 N, 123-04-36.6 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
K223AJ	UKIAH-LAKEPORT	CA 223 D	0.07	0.00	148.7	-20.78 dB Existing LIC
KFGY	HEALDSBURG	CA 225 B	45.72	0.00	153.5	-5.79 dB 2 nd Adjacent
KBEB	SACRAMENTO	CA 223 B	146.52	0.00	108.3	5.72 dB
KUNK	MENDOCINO	CA 224 A	65.25	0.00	291.4	9.64 dB
KLVR	MIDDLETOWN	CA 220 B	64.20	0.00	143.0	10.44 dB
KUKI-FM	UKIAH	CA 277 B	27.41	15.00	322.5	12.4
KOWS-LP	OCCIDENTAL	CA 223 LP100	80.46	24.00	172.6	13.68 dB
KUNK	MENDOCINO	CA 224 A	70.63	0.00	297.4	16.60 dB
KOWS-LP	OCCIDENTAL	CA 223 LP100	85.27	24.00	169.6	17.19 dB

COMPLIANCE, 74.1204(a) [Contour overlap]

The correction of coordinates does not change any protections to any other facilities.

COMPLIANCE, 74.1204(d) [2nd Adjacent Interference]

The corrected translator location is within the 54dBu contour of KFGY (225B). The tower site is located on Cow Mountain, a remote mountain top on US Forest Service property. There are no residences for miles around the site, therefore no interference is expected to KFGY in any inhabited locations.

COMPLIANCE, 74.1233 [Minor Change]

The coordinate correction of 0.07km clearly provides 1mV/m to some portion of the currently authorized 1mV/m service area. The proposed changes are considered minor based upon 74.1233(a).

Environmental Exhibit

The corrected translator facility will continue utilize a nondirectional antenna located on an existing tower. The attachment of the proposed translator antenna will not alter the existing tower structure for purposes of the Nationwide Programmatic Agreement and the NHPA Section 106.

The facility will continue to operate at 10 watts and 10m AGL using an ERI LPX-1E antenna. Based upon the FCC website “FM MODEL” using an EPA Type 3 “opposed U Dipole” antenna, it will generate 0.3μW/cm² which is 0.15% of the allowable MPE. There are several non-excluded facilities in the proximity of the tower, however, because the RF emission will be less than 5% of the allowable MPE, the facility will be in

compliance with FCC guidelines and is excluded from further Environmental Assessment under 47CFR 1.1306 and 1.1307 and may be considered independently of other facilities operating at the tower site.

The proposed new FM translator along with other users at the site will maintain an occupational safety policy and agrees to reduce power or cease operation during periods of maintenance to avoid potentially harmful exposure of personnel to non-ionizing RF radiation.

Respectfully Submitted

A handwritten signature in cursive script, appearing to read "Bert Goldman", written in dark ink.

Bert Goldman
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EXHIBIT A- Tower Survey

NATIONAL SURVEYING SPECIALISTS, INC.

212 Forest Way
Schertz, Texas 78154
(405) 202-3001

2-C CERTIFICATION

DATE: June 13, 2004
SITE NUMBER: 41549
SITE NAME: COW MTN T2 CA
CITY AND STATE: Lakeport, California

We, **National Surveying Specialists, Inc.**, certify that the latitude **39-07-50.56** North and longitude **123-04-36.60** West are accurate to within +/- 50 feet horizontally; and that the site elevations below are within +/-20 feet vertically. The horizontal datum (coordinates) are in terms of North America Datum of 1983 (NAD 83) and expressed as degrees, minutes and seconds. The vertical datum (elevation) is in terms of the North American Vertical Datum of 1988 (NAVD 88), and is determined in feet.

LOCATION	ELEVATION (AMSL-FEET)	HEIGHT (AGL-FEET)
GROUND ELEVATION AT BASE OF TOWER:	3558'	0'
TOP OF TOWER STEEL:	3638'	80'
TOP OF ANTENNA (Highest Appurtenance):	3644'	86'



June 13, 2004

Earl N. Strom
California Licensed Surveyor # 6087

Date