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Minor modification for K227CT
AGAT, GU
MCS, LLC
BLFT-20141028ABT

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



AGAT, GU – Channel: 227D (93.3 MHz) ~ ERP: 0.250 kW
Elev: 288 meters ~ RCAGL: 18 meters ~ RCAMSL: 306 meters ~ HAAT: 276 meters
Overall tower height: 27 meters AGL ~ ASR: None (no airports within 5 miles)
NAD83 Latitude: 13° 25' 58.1" NL – Longitude: 144° 42' 45.2" EL

No impacted AM broadcast stations.

R E C NETWORKS
CHANNEL REPORT

NAD83 LATITUDE: 13 - 25' 58.0" - LONGITUDE: 144 - 42' 45.1"
CHANNEL: 227 - CLASS: D

CHAN	FREQ	CALL	LOCATION	CLS	DIST	REQ	CLEAR	BEAR
224	92.7	KMOY : MOY COMMUNICATIONS, INC.	DEDED0	GU C1	13.8	0.0	13.8	296.5
227	93.3	K227CT : MCS, LLC	AGAT	GU D2	2.0	0.0	2.0	13.7
230	93.9	KUAM-FM : PACIFIC TELESTATIONS, LLC	AGANA	GU C2	0.3	0.0	0.3	119.5

BETWEEN CHANNELS 224 AND 230, THESE ARE THE ONLY THREE LICENSED FACILITIES ON ALL OF GUAM AND THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS.

THIRD-ADJACENT CHANNEL OVERLAP WILL BE DISCUSSED ON THE NEXT PAGE.

**REQUEST OF WAIVER OF §74.1201(a)
OVERLAPPING THIRD-ADJACENT CHANNEL STATIONS**

K227CT
Agat, Guam
Channel 227D ~ 93.3 MHz

K227CT is currently third-adjacent channel overlapped with KMOY, Dededo, Guam and KUAM-FM, Agana, Guam. This application is proposing to change transmitter site location and increase power, thus increasing overlap to both stations.

KMOY operates on Channel 224C1 with 42 kW at 36 meters HAAT into a directional antenna. KMOY places a 83.2 dBu service contour at the proposed site.

KUAM operates on Channel 230C2 from a site 300 meters away from the proposed site. KUAM operates with 5.2 kW at 289 meters HAAT. KUAM places a 120 dBu service contour at the proposed site.

When considering multiple stations, we further the facility with the weakest arriving field strength, which in this case would be KMOY. Utilizing the U/D method, the proposed facility is predicted to create an undesired interference overlap in respect to KMOY to the proposed translator station's 123.2 dBu interfering contour (overlap zone). At 250 watts, the overlap zone extends to 77 meters. All surrounding structures within 77 meters at this mountaintop transmitter site are normally unoccupied and are mainly used for maintaining the communications sites at Mount Alutom.

Based on the information provided, it can be demonstrated that the operation of K227CT from the Mount Alutom site with 250 watts ERP will not create any interference to listeners or potential listeners of KUAM-FM and KMOY. Therefore, the applicant is requesting a waiver of §74.1204(a) in respect to KMOY, Dededo, Guam and KUAM-FM, Agana, Guam.

Prepared by,

/S/
Michelle Bradley, CBT
REC Networks

September 27, 2022

Mount Alutom from the north



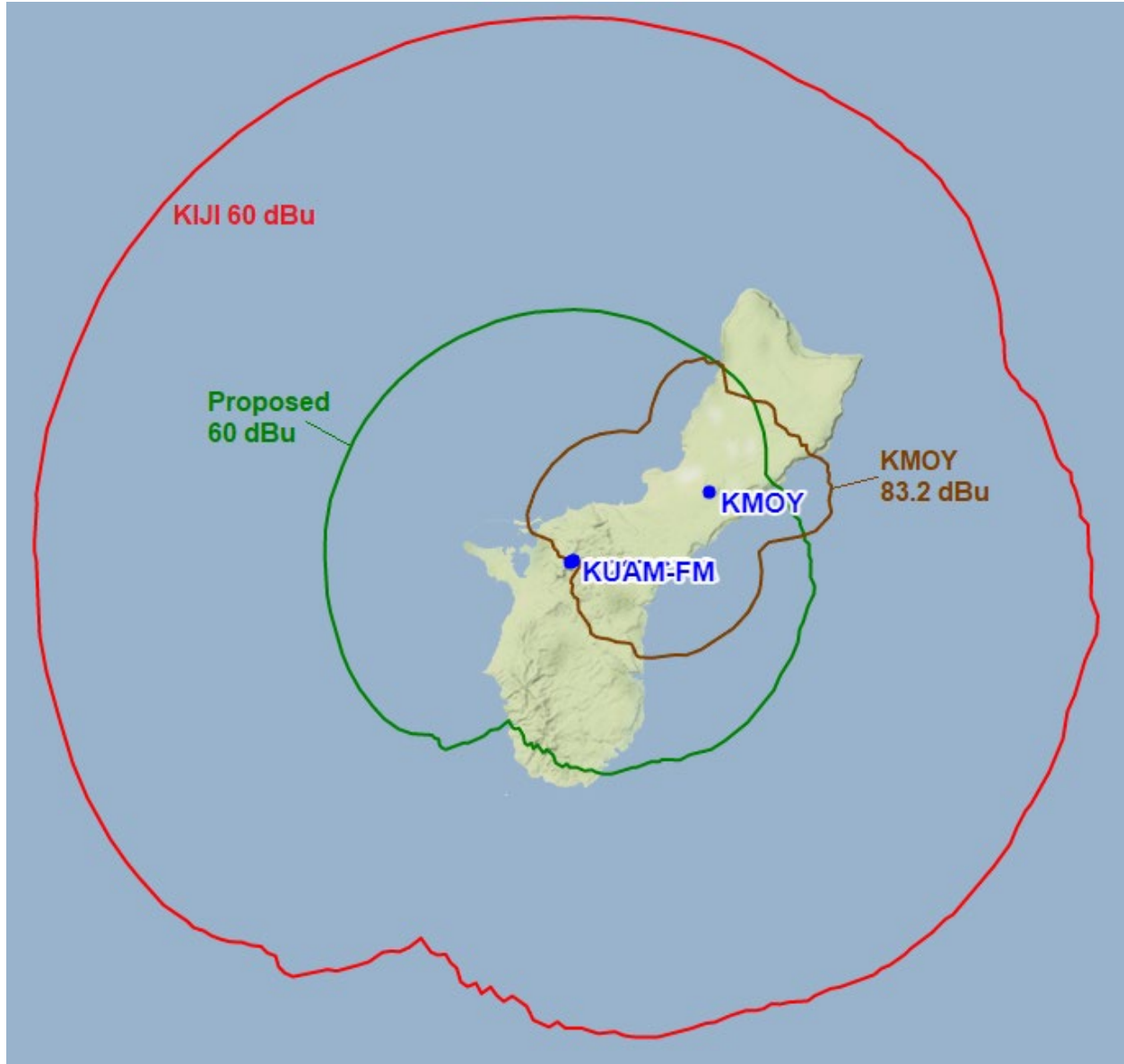
View from the South



123.2 dBu interfering contour of proposed facility



Proposed Fill-in Service with KIJJ, Timon, Guam



NEARBY AM STATIONS

K227CT
Agat, Guam
Channel 227D ~ 93.3 MHz

All nearby AM stations are nondirectional facilities with the longest wavelength being KGUM on 529 meters. There are no AM stations within 529 meters of the proposed facility. The nearest station is 2,158 meters separated. No notification to AM stations is required.

Array Center Latitude	Distance Longitude	Elec. Req'd	Degrees Req'd	Actual	Notify AM Station Req'd Actual
KGUM 567 kHz (529 m) 13 23' 27.60"	BL-20190729ABL 144 45' 42.12"	Non-Directional (Daytime) 529 m	7051 m	60	18.37 NO
KGUM 567 kHz (529 m) 13 23' 27.60"	BL-20190729ABL 144 45' 42.12"	Non-Directional (Nighttime) 529 m	7051 m	60	18.37 NO
KUAM 630 kHz (476 m) 13 26' 52.80"	BML-20210224AAG 144 45' 21.96"	Non-Directional (Daytime) 476 m	5006 m	60	20.41 NO
KUAM 630 kHz (476 m) 13 26' 52.80"	BML-20210224AAG 144 45' 21.96"	Non-Directional (Nighttime) 476 m	5006 m	60	20.41 NO
KTWG 801 kHz (375 m) 13 27' 7.20"	BL-19820930AB 144 42' 32.40"	Non-Directional (Unlimited) 375 m	2158 m	60	25.95 NO
KVOG 1530 kHz (196 m) 13 27' 25.20"	BL-20081017AHV 144 40' 19.92"	Non-Directional (Daytime) 196 m	5125 m	60	49.57 NO
KVOG 1530 kHz (196 m) 13 27' 25.20"	BL-20081017AHV 144 40' 19.92"	Non-Directional (Nighttime) 196 m	5125 m	60	49.57 NO
KUSG 1350 kHz (222 m) 13 27' 25.20"	BL-20120709AGI 144 40' 19.92"	Non-Directional (Daytime) 222 m	5125 m	60	43.74 NO
KUSG 1350 kHz (222 m) 13 27' 25.20"	BL-20120709AGI 144 40' 19.92"	Non-Directional (Nighttime) 222 m	5125 m	60	43.74 NO

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NEPA COMPLIANCE

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Agat, Guam
Channel 227D ~ 93.3 MHz

With the addition of the proposed facility on this tower, the power density will be as follows:

Call	kW	Type	Sect/Spac	Above ground	Peak power density
KIJI	8.6-H/V	EPA-2	5/0.9	21 m	53.3 $\mu\text{W}/\text{cm}^2$ @ 2.6m
Prop	0.25-HV	EPA-1	2/0.85	18 m	29.7 $\mu\text{W}/\text{cm}^2$ @ 2.8m

Utilizing the Commission's FM MODEL software, it has been determined that at no point will the power density exceed $83 \mu\text{W}/\text{cm}^2$ at any point. Therefore, the peak power density from this tower site does not exceed the general population/controlled exposure guideline of $200 \mu\text{W}/\text{cm}^2$.

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