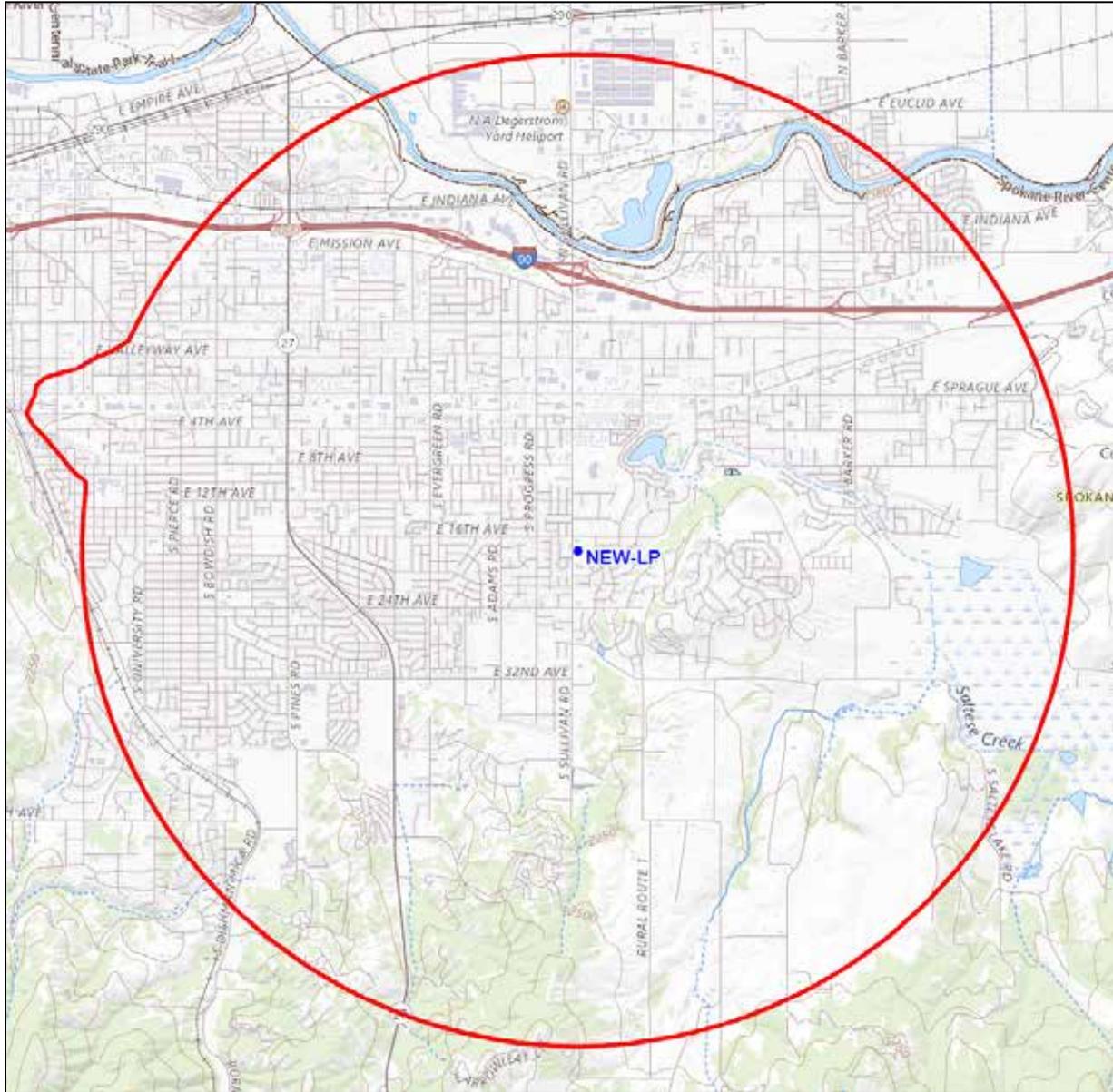




REC Networks/Michelle Bradley CBT
 11541 Riverton Wharf Rd.
 Mardela Springs, MD 21837
 844.REC.LPFM/202.621.2355
 recnet.com

Original Construction Permit Application
 SPOKANE VALLEY, WA
SPOKANE ADVENTIST RADIO KINSHIP
 Facility ID: 787856

PROPOSED 60dBu F(50,50) SERVICE CONTOUR



SPOKANE VALLEY, WA ~ Channel 253LP100 (98.5 MHz) ~ ERP 0.100 kW
 Elev: 628.1 meters ~ RCAGL: 9.1 meters ~ RCAMSL: 637.2 meters ~ HAAT: minus 108 m
 Overall tower height: 9.1 meters AGL ~ ASR: None (No airports within 5 miles)
 NAD83 Latitude: 47° 38' 27.7" NL ~ Longitude: 117° 11' 45.0" WL
 No AM stations within 3 km.
 Elevation and HAAT based on NED1 data from FCC Contours API.
 New antenna construction on roof of building.

SPOKANE ADVENTIST RADIO KINSHIP

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)

Distance separation	<i>§73.807</i>	3
Second-Adjacent Channel Waiver request	<i>§73.807</i>	4
Educational Statement	<i>§73.503(a)</i>	7
Evidence of Corporation Status	<i>§73.503(a)</i>	8
LPFM Point System factors	<i>§73.872</i>	9
Demonstration of localism	<i>§73.853</i>	10

R E C NETWORKS
CHANNEL REPORT

NAD83 LATITUDE: 47 - 38' 27.7" - LONGITUDE: 117 - 11' 45.0"
CHANNEL: 253 - CLASS: LP100

CHAN	FREQ	CALL	LOCATION	CLS	DIST	REQ	CLEAR	BEAR
250	97.9	CBRJ	PHOENIX	BC B	192.4	66.0	126.4	327.5

250	97.9	KZTB : BUSTOS MEDIA HOLDINGS, LLC	MILTON-FREEWATER	OR C1	218.3	0.0	218.3	200.1

250	97.9	CBRJ	PHOENIX	BC B	192.4	66.0	126.4	327.5

251	98.1	KISC : IHM LICENSES, LLC > See waiver request.	SPOKANE	WA C	10.1	93.0	-82.9	228.7

253	98.5	KZID : NELLY BROADCASTING, LLC	CULDESAC	ID C3	132.8	78.0	54.8	170.5

253	98.5	KBBZ : BEE BROADCASTING, INC.	KALISPELL	MT C	231.7	130.0	101.7	64.2

253	98.5	KEYG-FM : Educational Media Foundation	GRAND COULEE	WA C0	131.9	122.0	9.9	279.3

253	98.5	KBBZ	KALISPELL	MT C	231.7	130.0	101.7	64.2

255	98.9	KKZX : IHM LICENSES, LLC > See waiver request.	SPOKANE	WA C	9.3	93.0	-83.7	234.8

256	99.1	NEW	FERNIE	BC B	252.9	66.0	186.9	36.8

256	99.1	NEW	FERNIE	BC B	252.9	66.0	186.9	36.8

256	99.1	KUJ-FM : SMG - TRI-CITIES, LLC	BURBANK	WA C1	226.0	0.0	226.0	221.2

REQUEST FOR WAIVER OF §73.807(a)
SHORT-SPACED SECOND-ADJACENT CHANNEL

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)

The instant application meets all §73.807 distance separation requirements with the exception of second-adjacent channel stations KISC and KKZX, both Spokane, Washington. We address these shortcomings as set forth.

KISC operates on Channel 251C with 94 kW Effective Radiated Power (ERP) at 619 meters Height Above Average Terrain (HAAT) into a nondirectional antenna. KISC places a 104.3 dBu service contour at the proposed site.

KKZX operates on Channel 255C with 100 kW ERP at 490 meters HAAT into a nondirectional antenna. KKZX places a 104.8 dBu service contour at the proposed site.

When evaluating multiple short-spaced second-adjacent channel facilities, we further examine the one with the weaker field strength at the proposed transmitter site. In this case, KISC.

Using the U/D method¹, the proposed LPFM station is predicted to produce an undesired interference overlap in respect to KISC to the proposed LPFM station's 144.3 dBu interfering contour ("overlap zone"). At 100 watts ERP using the free-space equation, the overlap zone only extends to 4 meters from the base of the radiation center of the antenna. The antenna is on the roof of a gymnasium/auditorium that is only a single story with a high ceiling. Therefore, the highest occupied area is 2 meters above ground level.

As the interfering contour only extends 4 meters from the radiation center and the radiation center height is 9.1 meters above ground level, the 144.3 dBu interfering contour will not reach any height lower than 5.1 meters above ground level and therefore, would not reach the occupied area of the structure. As such, it can be concluded that the proposed interfering contour of the instant application will not result in any interference to any listeners or potential listeners of KISC or KKZX.

As we have determined that the proposed facility will not cause any interference, the applicant is requesting a waiver of §73.807(a) in respect to KISC and KKZX, both Spokane, Washington.

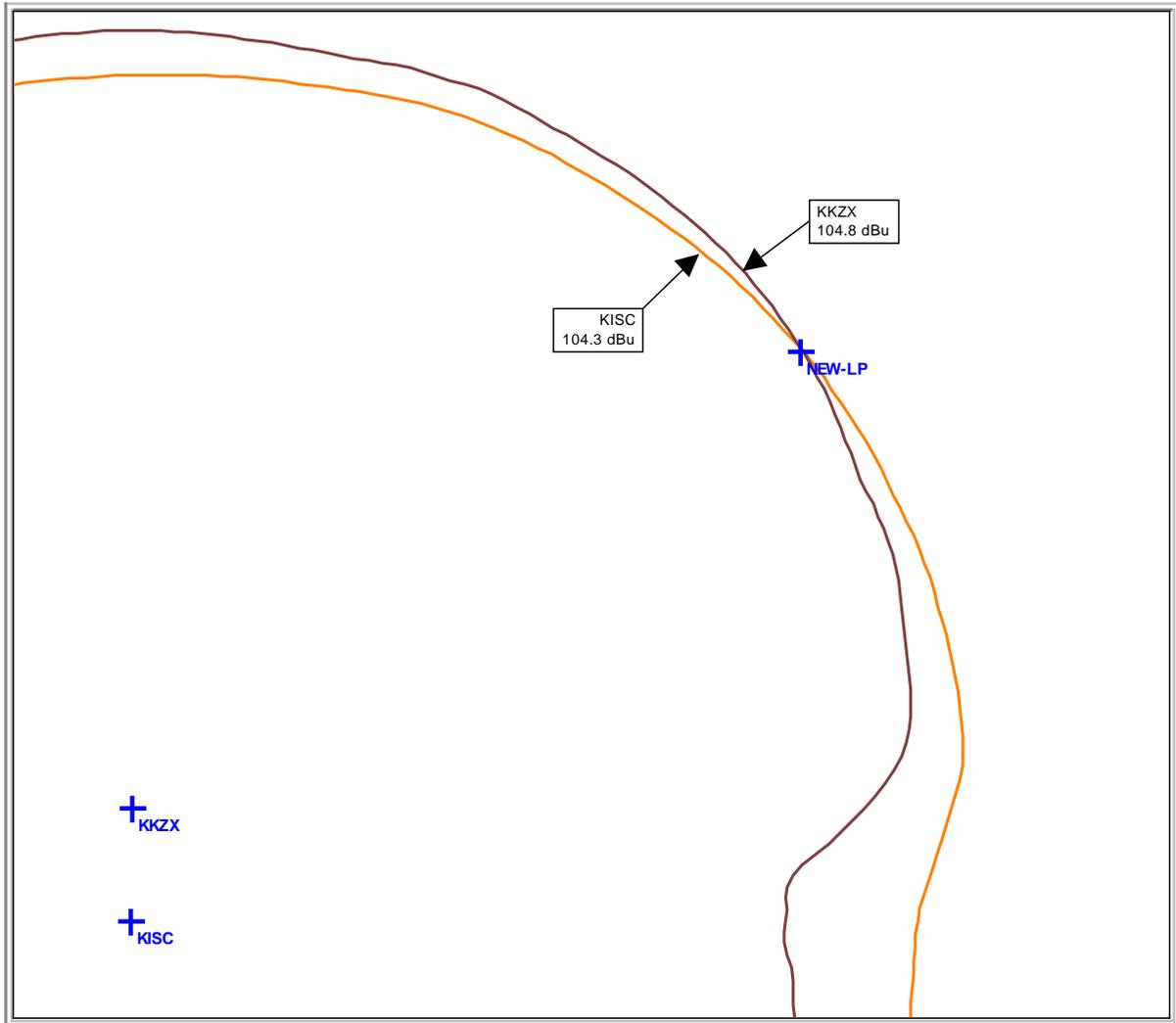
Prepared by,

/S/
Michelle Bradley, CBT
REC Networks

December 6, 2023

¹ See *Living Way Ministries, Inc.* Memorandum Opinion and Order, 17 FCC Rcd 17054, 17056 (2002) at 5. *Recon denied* 23 FCC Rcd 15070 (2008).

Second-adjacent channel short-spaced facilities





EDUCATIONAL STATEMENT

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)

Spokane Adventist Radio Kinship is a media group that is dedicated to providing religious, spiritual and family life educational resources to the local community of young working families.

The radio station will advance the organization's educational objectives through bible-based teachings, instruction on money management, child education resources, family life resources and science educational resources, in addition to information regarding local church and school opportunities that directly benefit the local community.

EVIDENCE OF CURRENT CORPORATION STATUS

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)



Corporations and Charities Filing
System

Business Information

BUSINESS INFORMATION

Business Name:	SPOKANE ADVENTIST RADIO KINSHIP	UBI Number:	605 341 694
Business Type:	WA NONPROFIT CORPORATION	Business Status:	ACTIVE
Principal Office Street Address:		Principal Office Mailing Address:	
Expiration Date:	10/31/2024	Jurisdiction:	UNITED STATES, WASHINGTON
Formation/ Registration Date:	10/12/2023	Period of Duration:	PERPETUAL
Inactive Date:		Nature of Business:	
Charitable Corporation:	<input checked="" type="checkbox"/>	Nonprofit EIN:	
Most Recent Gross Revenue is less than \$500,000:	<input checked="" type="checkbox"/>	Has Members:	<input type="checkbox"/>
Public Benefit Designation:	<input type="checkbox"/>	Host Home:	<input type="checkbox"/>

REGISTERED AGENT INFORMATION

Registered Agent Name:	NORTHWEST REGISTERED AGENT, LLC		
Street Address:	522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES	Mailing Address:	522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES

GOVERNORS

LPFM POINT FACTORS

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)

County of transmitting antenna	Market Name	Market Rank
Spokane, Washington	Spokane, WA	88

The proposed facility will claim 4 points as set forth:

Established Community Presence – no point

As the organization was established on October 12, 2023, the applicant is unable to claim the Established Community Presence point, pursuant to §73.872(b)(1).

Local Programming – 1 point

Applicant pledges to originate at least 8 hours of local programming, pursuant to Commission policies regarding the LPFM point system, pursuant to §73.872(b)(2).

Main Studio – 1 point

Applicant pledges to make available an accessible main studio, capable of program origination for a Applicant of 20 hours per week. Applicant claims the Main Studio point, pursuant to §73.872(b)(3).

Local Programming and Main Studio – 1 point

As both the Local Programming and Main Studio points are being claimed, the additional Local Programming and Main Studio "bonus" point is also claimed, pursuant to §73.872(b)(4).

Diversity of Ownership – 1 point

Applicant has no other attributable interests and therefore is eligible to claim the Diversity of Ownership point, pursuant to §73.872(b)(5) and Page 5 of the Second Window Notice.

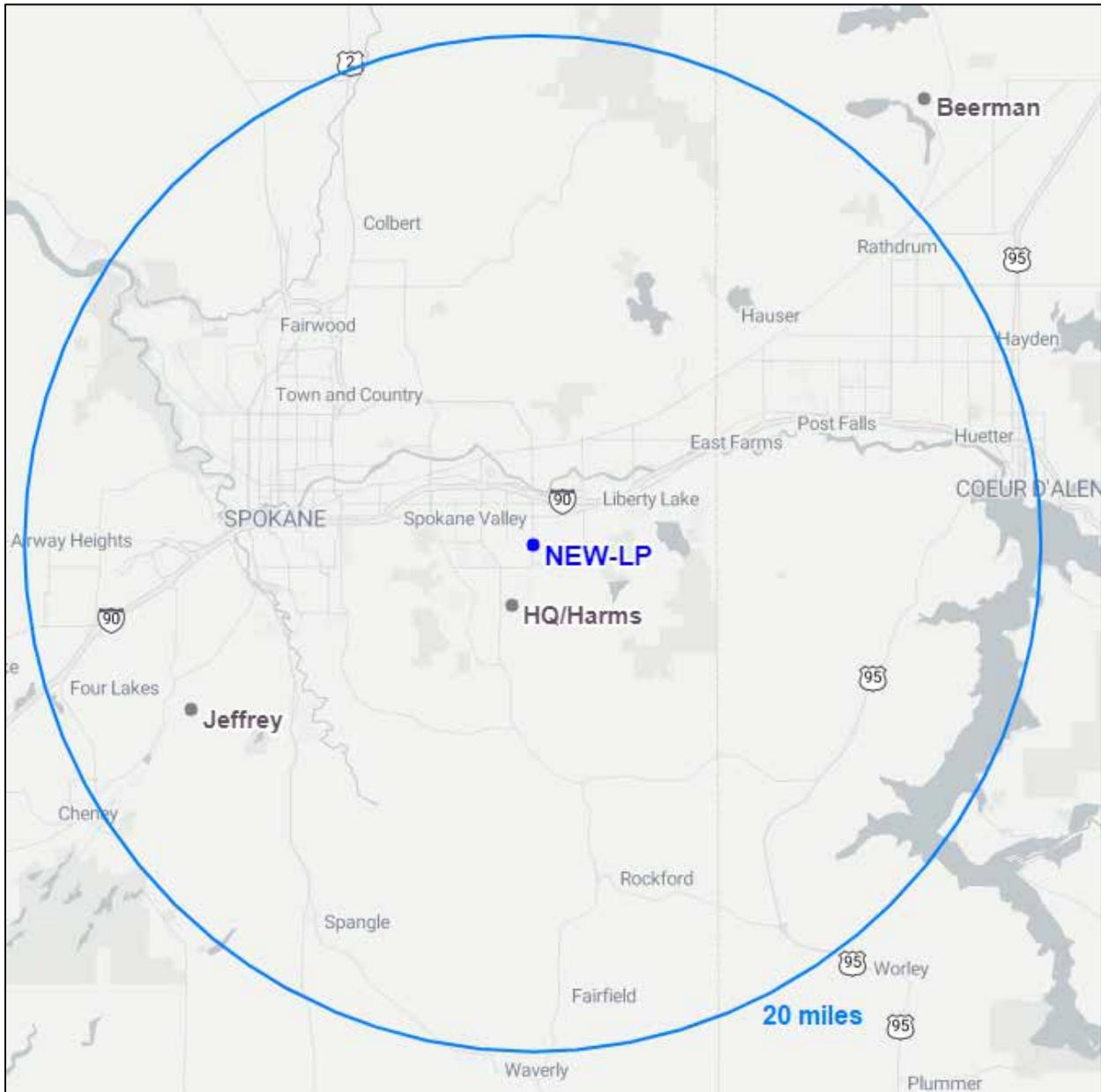
Prepared by,

/S/
Michelle Bradley, CBT
REC Networks

December 6, 2023

LOCALISM

New(LP)
Spokane Valley, Washington
Channel 253LP100 (98.5 MHz)



The main studio is co-located at the transmitter site.

Localism is based on the headquarters, which is located within 20 miles of the proposed site.
2 of 3 board members (66.7%) reside within 20 miles of the proposed site.