

PROPOSED MINOR MODIFICATION TO LPFM FACILITY
Stockton, California

File No. BNPL-20131115AAL

Applicant proposes moving to another channel during LPFM
Major Modification filing window to partially trifurcate
LPFM MX 63:

Site Location: 37° 57' 36.5" 121° 12' 16.4" (NAD83)

Site Location: 37° 57' 36.8" 121° 12' 12.6" (NAD27)

GROUND 14 m

TOWER 31 m

AGL 30 m

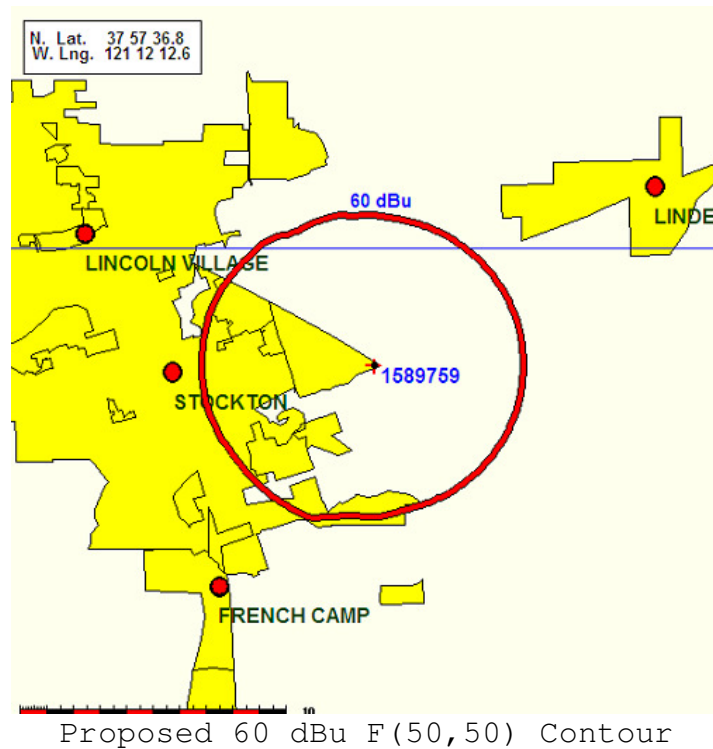
ASR NA

AMSL 44 m

HAAT 30 m

WATTS 100

CHANNEL 255



SPACING

With Our Words, Inc.

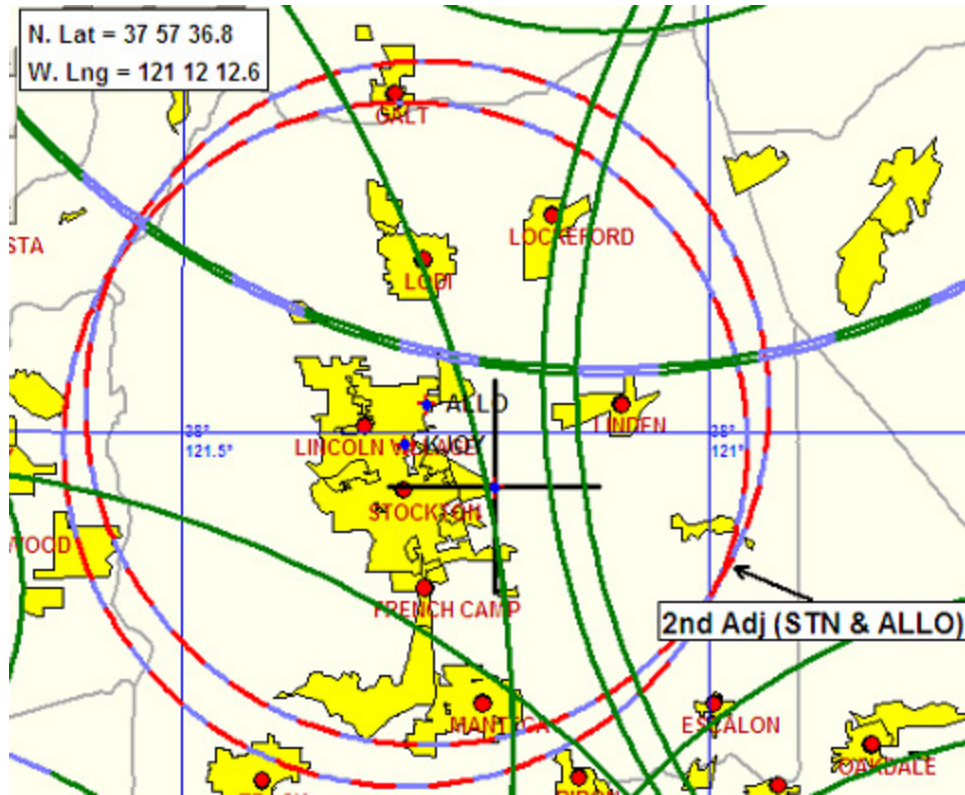
REFERENCE 37 57 36.8 N. CLASS = L1 DISPLAY DATES DATA 12-22-13
 121 12 12.6 W. Current Spacings to 2nd Adj. SEARCH 06-30-14
 ----- Channel 255 - 98.9 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
*KJOY	LIC-Z 257A	Stockton	CA 295.3	8.20	28.5	-20.3
*ALLO	USE 257A	Stockton	CA 321.0	8.91	28.5	-19.6
ALLO	USE 255B	San Francisco	CA 258.6	112.14	111.5	0.6
KSOL	LIC 255B	San Francisco	CA 258.6	112.17	111.5	0.7
ALLO	USE 255A	Columbia	CA 82.9	71.05	66.5	4.6
KCVR-FM	LIC 255A	Columbia	CA 83.0	73.88	66.5	7.4
ALLO	USE 253B	Sacramento	CA 6.9	76.35	66.5	9.9
KRXQ	LIC 253B	Sacramento	CA 6.9	76.91	66.5	10.4
ALLO	USE 256B	Santa Cruz	CA 211.1	109.94	96.5	13.4
KSQL	LIC-D 256B	Santa Cruz	CA 211.1	109.94	96.5	13.4
ALLO	USE 254A	Winton	CA 140.4	82.28	55.5	26.8
KLOQ-FM	LIC 254A	Winton	CA 146.0	91.25	55.5	35.8
K256AG	CP -D 255D	Clarksville	CA 6.9	76.91	38.5	38.4
KSOL-FM3	LIC-D 255D	Pleasanton	CA 262.3	63.42	23.5	39.9
KUFY	LIC 253B	San Jose	CA 218.2	106.61	66.5	40.1
ALLO	USE 253B	San Jose	CA 218.2	106.61	66.5	40.1
K257FN	CP 257D	Angels Camp	CA 82.8	54.69	13.5	41.2
1592981	APP 256L1	Sacramento	CA 341.8	61.26	13.5	47.8

 All separation margins include rounding

* See Second Adjacent Waiver Request

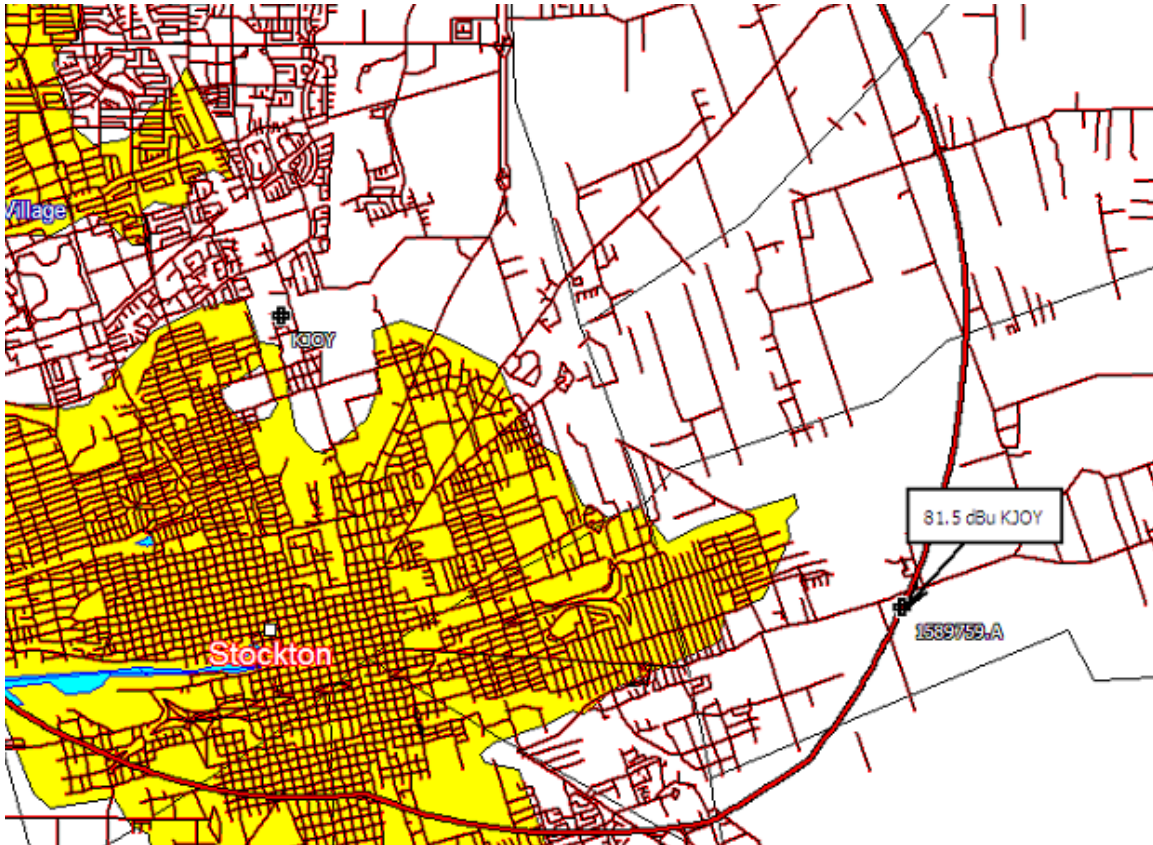
SPACING MAP



SECOND ADJACENT WAIVER REQUEST

Applicant requests a waiver of the Second Adjacent minimum spacing requirements stated in §73.807 of the FCC rules using U/D no-population inference protocol. The channel second adjacent to proposed are as followed:

CALL	COL	CH/CLSDIST	ERP	HAAT	Field	Overlap	Overlap/ground
KJOY	STOCKTON CA	257A 8.2	4	112.5	81.5 dBu	59	52



At the proposed facility site, KJOY Stockton, CA has an estimated signal strength of 81.5 dBu.

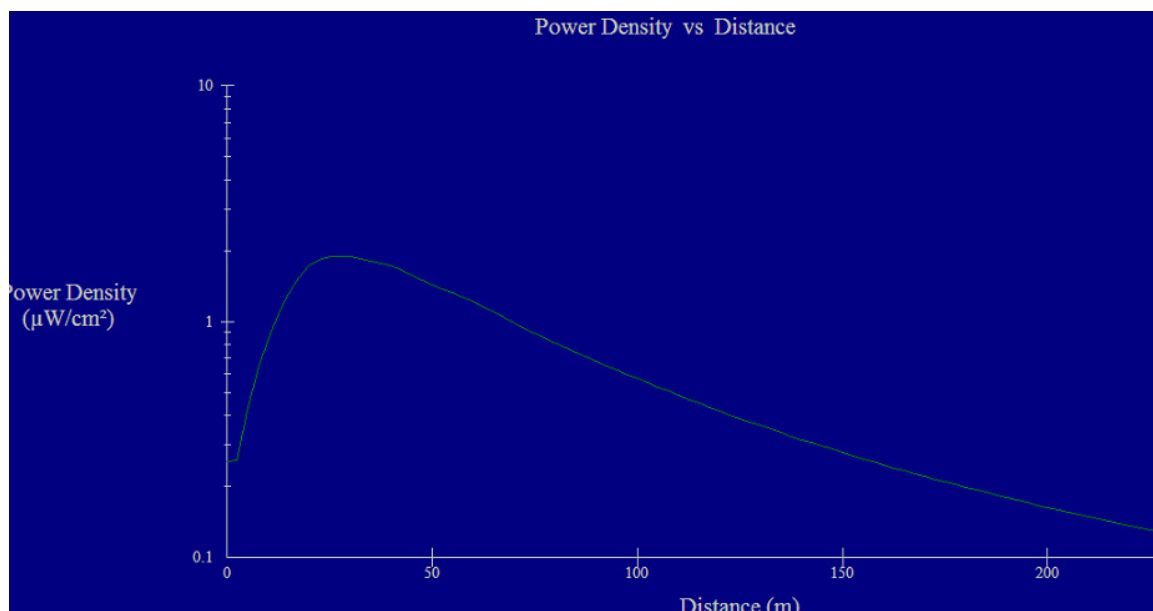
Contour protection to second adjacent station KJOY is provided using the ratio method. Using the appropriate U/D ratio of 40 db, the corresponding interfering contour of the proposed facility is thus 21.5 dBu. At 100 watts, this contour would extend to a distance of 59 meters from the antenna. On the ground this radius is projected to 52 meters. The proposed tower location is located on rural farmland next to a levee. No population resides in the overlap area. Because of this, applicant contends zero population will be interfered with. An aerial photo of the proposed facility with interference radius is below.



NON-IONIZING ELECTROMAGNETIC RADIATION (NEIR) ANALYSIS

The Effective Radiated Power for proposed will be 100 watts, mounted on a tower 30 meters tall. The OET program *FM Model* for Windows, Version 2.10 Beta was used to determine the maximum predicted RF exposure. The settings used were:

Antenna: Jampro "Flying V" (closest match)
Vertical ERP (W): 100
Horizontal ERP (W): 100
Antenna Height (m): 30
Number of Elements: 1
Spacing: 1



Using these settings, the maximum predicted RF exposure for a human standing on the ground would be less than 1.2 at 27.5 m. This represents less than 5% of the FCC Maximum Permissible Exposure (MPE) of $200 \mu\text{W}/\text{cm}^2$ for uncontrolled environments. 47 CFR 1.1307(b)(3) exempts applicants from preparing an Environmental Assessment when the predicted

exposure levels when the predicted exposure levels would be less than 5% of the FCC limits.

The tower is inaccessible by the public (private site/private property) and will have a no climbing with a warning sign to potential climbers. Facility is on private property. If work on tower is required facility will be temporarily powered down.