

Request for Waiver – Displacement Relief

University of Northern Iowa

Minor Change to FM Translator Station K269EJ, Des Moines, IA

The University of Northern Iowa (UNI) respectfully requests a waiver of Section 74.1233(a)(1) of the FCC's Rules in connection with the instant application for a minor change to the license facility of FM translator station K269EJ, Des Moines, Iowa. This application seeks displacement relief to modify the existing FM translator station for use of Channel 249.

FM Translator Displacement. FM translator Station K269EJ has been in use by UNI since it was originally licensed in 1994 (see File No. BLFT-19940308TG). The station's current channel 269 facility was licensed in 1998, following modifications to the translator facility. Presently, however, station K269EJ is facing displacement from its operating frequency due to the minor change application submitted in FCC File No. BPH-201000126AGR, which calls for modification of KTIA-FM and an associated modification of KPUL(FM) from Channel 258 to Channel 269. The full-service FM station's move to channel 269 will displace UNI's FM translator K269EJ and require the translator to broadcast over a different frequency.

Channel Availability and Preclusion. The Channel Preclusion studies in Attachments 2 and 3 to this request demonstrate that UNI cannot use any adjacent, second adjacent, third adjacent or I.F. channel in connection with the modification of FM translator K269EJ. As a result, UNI is unable to propose a channel change for this translator which corresponds with the minor change provisions of Section 74.1233(a)(1), which states that a major change for an FM translator station is "...is any change in frequency (output channel) except changes to first, second or third adjacent channels, or intermediate frequency channels, and any change in antenna location where the station would not continue to provide 1 mV/m service to some portion of its previously authorized 1 mV/m service area. All other changes will be considered minor."

Use of Channel 249. As detailed in the instant application, however, UNI may utilize the proposed channel 249 for this FM translator station in compliance with all applicable protection requirements and technical considerations. Accordingly, UNI requests a waiver of Section 74.1233(a)(1) to permit displacement of K269EJ to channel 249.

UNI respectfully submits that the public interest will be well served by the requested channel change and waiver, which would allow continued use of this FM translator station to broadcast noncommercial educational programming to the Des Moines, Iowa area. UNI utilizes FM translator K269EJ to rebroadcast the signal of co-licensed noncommercial educational radio station KUNI(FM), Cedar Falls, Iowa. As part of the Iowa Public Radio statewide network of public radio stations, KUNI and K269EJ provide a mix of local and national noncommercial educational programming, including news, public affairs, and talk for their local communities. Iowa Public Radio's mission is to inform, enrich, and engage Iowans through radio programming and other media.

University Of Northern Iowa												
Current K269EJ Channel, Showing Displacement by KPUL												
CH# 269D - 101.7 MHz, Pwr= 0.25 kW, HAAT= 91.0 M, COR= 356 M												
Average Protected F(50-50)= 12.29 km												
Omni-directional												
DISPLAY DATES												
DATA 04-13-10												
SEARCH 04-13-10												
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kW)	INT(km)	PRO(km)	*IN*	*OUT*	
CITY		STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)		
269D	K269EJ	LIC	_CN	0.0	0.0	41 35 02.0	0.250	43.3	12.6	-55.9*<	-55.9*<	
Des Moines		IA		0.0	BLFT19980116TD	93 38 29.0	91	356	University Of Northern Iowa			
269A	KPUL	USR	___	228.4	30.6	41 24 02.0	6.000	87.3	28.8	-68.2*<	-37.6*<	
Winterset		IA		48.2		93 54 58.0	100	396				
268C2	KKSI	LIC	_CN	122.4	93.0	41 07 57.0	49.000	77.4	51.7	2.4	21.6	
Eddyville		IA		303.0	BLH19901127KC	92 42 12.0	152	390	O-town Communications, Inc			
271D	636855	APP	_C_	256.6	17.1	41 32 53.0	0.250	1.1	11.1	4.1	4.9	
West Des Moines		IA		76.5	BNPFT20030314CCK	93 50 29.0		341	University Of Northern Iowa			
266C1	KXIA	LIC	_CN	51.3	75.4	42 00 19.0	100.000	7.9	62.3	55.4	12.0	
Marshalltown		IA		231.8	BLH19950727KE	92 55 45.0	200	491	Marshalltown Broadcasting,			
269C2	KAYL-FM	LIC	_C_	313.3	171.9	42 38 05.0	50.000	136.1	50.6	25.0	84.9	
Storm Lake		IA		132.3	BLH20011011AAR	95 10 10.0	122	538	Sorenson Broadcasting Corp			
268D	641370	APP	_C_	335.4	58.9	42 03 56.1	0.092	19.9	13.3	26.5	26.9	
Boone		IA		155.2	BNPFT20030317IQF	93 56 17.2		470	Radio Assist Ministry, Inc			
271D	640551	APP	_C_	73.4	42.3	41 41 30.0	0.170	0.9	11.9	28.9	29.3	
Newton		IA		253.7	BNPFT20030314BDO	93 09 11.0		364	Holcomb International Mini			

Terrain database is FCC NGDC 30 Sec, R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference zone = 2, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
"<" = Contour Overlap

HOW TO READ THE FM COMPUTER PRINT-OUT

Translator Reference Station

The computer printout should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table. Contour distances are in kilometers and are predicted using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90. The column labeled "* OUT *" shows the greatest distance in kilometers of overlap (or smallest distance of clearance) between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing contour overlap. Since translators are able to receive interference there is no "In" or incoming column in this report.

Listed antenna heights and power are the specific antenna heights and power from the FCC database.

Under the "AZI" column, the first row of numbers indicate the True North azimuths from the reference station toward the database stations, while the numbers in the second row indicate the reverse bearings from the database stations to the reference station. Bearings are calculated using spherical trigonometry.

The columns labeled "INT" and "PRO" contain the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

For I.F. relationships the minimum spacings the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum **required** distance in kilometers, while the letter "M" in the next column follows the **available clear space** separation in kilometers. Minimum separation distances when displayed are taken from Sec 73.207 of the rules as amended. Canadian and Mexican separation distances, U/D ratios and protected contour values are from the US/Mexican Working Agreement and the US/Canada Working Agreement".

The first three letters of the "TYPE" column identify the current FCC status of the stations. The fourth letter will be a "D" if the facility is directional. "Z" indicates a 73.215 directional. An "N" indicates it is a 73.215 station that operates with an omni-directional antenna. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a "Y" if the antenna uses beam tilt or an "X" if the commission is not sure, otherwise it will be an "N" or left blank.

CHANNEL PRECLUSION STUDY

University Of Northern Iowa
With KPUL moving to channel 269
Class= D , Pwr=0.25 kW, HAAT= 91 M, COR= 356 M
Average Protected F(50-50)= 12.29 km
Omni-directional

DISPLAY DATES
DATA 04-13-10
SEARCH 04-13-10

REFERENCE
41 35 02. N.
93 38 29. W.

CH CITY	CALL	TYPE ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
--- Channel 266 101.1 MHz. ---										
269D K269EJ Des Moines		LIC _CN IA	0.0 0.0	0.0 BLFT19980116TD	41 35 02.0 93 38 29.0	0.250 91	1.1 356	12.6 University Of Northern Iowa	-13.7*<	-13.7*<
266C1 KXIA Marshalltown		LIC _CN IA	51.3 231.8	75.4 BLH19950727KE	42 00 19.0 92 55 45.0	100.000 200	160.0 491	62.3 Marshalltown Broadcasting,	-96.7*<	-28.8*<
265D 638594 West Des Moines		APP _C_ IA	262.7 82.7	4.6 BNPFT20030314CCN	41 34 43.0 93 41 48.0	0.099	10.5 297	7.3 Northwestern College	-17.6*<	-19.7*<
264D 629251 Grimes		APP _V_ IA	327.9 147.8	9.4 BNPFT20030310BBM	41 39 19.0 93 42 05.0	0.099	0.7 284	5.6 Calvary Chapel Of Twin Falls	-4.1*<	2.6
264D 635737 Des Moines		APP _C_ IA	313.2 133.1	13.1 BNPFT20030314BEF	41 39 53.0 93 45 24.0	0.115	0.8 419	12.8 Holcomb International Mini	1.7	-0.8*<
--- Channel 267 101.3 MHz. ---										
269D K269EJ Des Moines		LIC _CN IA	0.0 0.0	0.0 BLFT19980116TD	41 35 02.0 93 38 29.0	0.250 91	1.1 356	12.6 University Of Northern Iowa	-13.7*<	-13.7*<
267C3 KSIB-FM Creston		LIC _CN IA	228.6 48.2	81.9 BLH19901130KG	41 05 41.0 94 22 30.0	19.000 111	111.7 499	40.2 G. O. Radio, Limited	-42.4*<	-0.8*<
266C1 KXIA Marshalltown		LIC _CN IA	51.3 231.8	75.4 BLH19950727KE	42 00 19.0 92 55 45.0	100.000 200	92.6 491	62.3 Marshalltown Broadcasting,	-29.3*<	-4.6*<
265D 638594 West Des Moines		APP _C_ IA	262.7 82.7	4.6 BNPFT20030314CCN	41 34 43.0 93 41 48.0	0.099	0.7 297	7.3 Northwestern College	-7.8*<	-3.8*<
264D 629251 Grimes		APP _V_ IA	327.9 147.8	9.4 BNPFT20030310BBM	41 39 19.0 93 42 05.0	0.099	0.7 284	5.6 Calvary Chapel Of Twin Falls	-4.1*<	2.6
264D 635737 Des Moines		APP _C_ IA	313.2 133.1	13.1 BNPFT20030314BEF	41 39 53.0 93 45 24.0	0.115	0.8 419	12.8 Holcomb International Mini	1.7	-0.8*<
--- Channel 268 101.5 MHz. ---										
269D K269EJ Des Moines		LIC _CN IA	0.0 0.0	0.0 BLFT19980116TD	41 35 02.0 93 38 29.0	0.250 91	18.7 356	12.6 University Of Northern Iowa	-31.3*<	-31.3*<
268C2 KKSI Eddyville		LIC _CN IA	122.4 303.0	93.0 BLH19901127KC	41 07 57.0 92 42 12.0	49.000 152	137.0 390	52.0 O-town Communications, Inc	-57.7*<	-5.7*<
269A KPUL Winterset		USR _ IA	228.4 48.2	30.6	41 24 02.0 93 54 58.0	6.000 100	45.9 396	28.8	-27.6*<	-17.3*<
265D 638594 West Des Moines		APP _C_ IA	262.7 82.7	4.6 BNPFT20030314CCN	41 34 43.0 93 41 48.0	0.099	0.7 297	7.3 Northwestern College	-7.8*<	-3.8*<
271D 632743 Grimes		APP _V_ IA	327.9 147.8	9.4 BNPFT20030310AXZ	41 39 19.0 93 42 05.0	0.010	0.2 284	3.2 Calvary Chapel Of Twin Falls	-3.6*<	5.1
271D 641448 Des Moines		APP _C_ IA	313.2 133.1	13.1 BNPFT20030317ITE	41 39 53.0 93 45 24.2	0.075	0.6 442	12.5 Radio Assist Ministry, Inc	1.8	-0.4*<
--- Channel 269 101.7 MHz. ---										
269D K269EJ Des Moines		LIC _CN IA	0.0 0.0	0.0 BLFT19980116TD	41 35 02.0 93 38 29.0	0.250 91	43.3 356	12.6 University Of Northern Iowa	-55.9*<	-55.9*<
269A KPUL Winterset		USR _ IA	228.4 48.2	30.6	41 24 02.0 93 54 58.0	6.000 100	88.6 396	28.8	-70.3*<	-42.3*<
271D 632743 Grimes		APP _V_ IA	327.9 147.8	9.4 BNPFT20030310AXZ	41 39 19.0 93 42 05.0	0.010	0.2 284	3.2 Calvary Chapel Of Twin Falls	-3.6*<	5.1
271D 641448 Des Moines		APP _C_ IA	313.2 133.1	13.1 BNPFT20030317ITE	41 39 53.0 93 45 24.2	0.075	0.6 442	12.5 Radio Assist Ministry, Inc	1.8	-0.4*<
--- Channel 270 101.9 MHz. ---										
269D K269EJ Des Moines		LIC _CN IA	0.0 0.0	0.0 BLFT19980116TD	41 35 02.0 93 38 29.0	0.250 91	18.7 356	12.6 University Of Northern Iowa	-31.3*<	-31.3*<

CH CI TY	CALL	TYPE STATE	ANT	AZI <--	DI ST FI LE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LI CENSEE	Page # 2 *IN* (Overlap in km)		*OUT*
273C	KSTZ	LIC _CY		6.7	24.2	41 48 01.0	100.000	11.5	79.4	0.3		-56.3*<
Des Moines		IA		186.7	BLHRB1104ZZ	93 36 27.0	384	675	Saga Communications Of			Low
269A	KPUL	USR _		228.4	30.6	41 24 02.0	6.000	45.9	28.8	-27.6*<		-17.3<
Winterset		IA		48.2		93 54 58.0	100	396				
270C	KNWS-FM	LIC _CX		58.0	174.1	42 24 02.0	100.000	189.4	85.6	-27.6*<		47.4
Waterloo		IA		239.2	BLED20051102ABH	91 50 36.0	479	762	Northwestern College			
271D	641448	APP _C_		313.2	13.1	41 39 53.0	0.075	19.9	12.5	-17.6*<		-19.2<
Des Moines		IA		133.1	BNPFT20030317ITE	93 45 24.2		442	Radio Assist Ministry, Inc			
271D	636855	APP _C_		256.6	17.1	41 32 53.0	0.250	16.8	11.6	-11.8<		-14.2<
West Des Moines		IA		76.5	BNPFT20030314CCK	93 50 29.0		341	University Of Northern Iowa			
271D	632743	APP _V_		327.9	9.4	41 39 19.0	0.010	4.4	3.2	-7.8*<		-12.9<
Grimes		IA		147.8	BNPFT20030310AXZ	93 42 05.0		284	Calvary Chapel Of Twin Falls			
217C2	KDFR	LIC DCX		69.2	10.2	41 36 59.0	32.000	2.0	12.5	14.5R		-4.3M
Des Moines		IA		249.3	BLED20030923ABC	93 31 36.0	136	405	Family Stations, Inc.			
--- Channel 271 102.1 MHz. ---												
269D	K269EJ	LIC _CN		0.0	0.0	41 35 02.0	0.250	1.1	12.6	-13.7*<		-13.7*<
Des Moines		IA		0.0	BLFT19980116TD	93 38 29.0	91	356	University Of Northern Iowa			
273C	KSTZ	LIC _CY		6.7	24.2	41 48 01.0	100.000	11.5	79.4	0.3		-56.3*<
Des Moines		IA		186.7	BLHRB1104ZZ	93 36 27.0	384	675	Saga Communications Of			Low
271D	641448	APP _C_		313.2	13.1	41 39 53.0	0.075	43.7	12.5	-41.4*<		-44.9<
Des Moines		IA		133.1	BNPFT20030317ITE	93 45 24.2		442	Radio Assist Ministry, Inc			
271D	636855	APP _C_		256.6	17.1	41 32 53.0	0.250	39.7	11.6	-34.7*<		-39.7<
West Des Moines		IA		76.5	BNPFT20030314CCK	93 50 29.0		341	University Of Northern Iowa			
271D	632743	APP _V_		327.9	9.4	41 39 19.0	0.010	10.2	3.2	-13.6*<		-38.1<
Grimes		IA		147.8	BNPFT20030310AXZ	93 42 05.0		284	Calvary Chapel Of Twin Falls			
271D	640551	APP _C_		73.4	42.3	41 41 30.0	0.170	41.6	12.6	-11.4<		-12.9<
Newton		IA		253.7	BNPFT20030314BDO	93 09 11.0		364	Holcomb International Mini			
217C2	KDFR	LIC DCX		69.2	10.2	41 36 59.0	32.000	2.0	12.5	14.5R		-4.3M
Des Moines		IA		249.3	BLED20030923ABC	93 31 36.0	136	405	Family Stations, Inc.			
--- Channel 272 102.3 MHz. ---												
269D	K269EJ	LIC _CN		0.0	0.0	41 35 02.0	0.250	1.1	12.6	-13.7*<		-13.7*<
Des Moines		IA		0.0	BLFT19980116TD	93 38 29.0	91	356	University Of Northern Iowa			
273C	KSTZ	LIC _CY		6.7	24.2	41 48 01.0	100.000	117.8	79.4	-106.6*<		-73.4*<
Des Moines		IA		186.7	BLHRB1104ZZ	93 36 27.0	384	675	Saga Communications Of			Low
271D	641448	APP _C_		313.2	13.1	41 39 53.0	0.075	19.9	12.5	-17.6*<		-19.2<
Des Moines		IA		133.1	BNPFT20030317ITE	93 45 24.2		442	Radio Assist Ministry, Inc			
271D	636855	APP _C_		256.6	17.1	41 32 53.0	0.250	16.8	11.6	-11.8<		-14.2<
West Des Moines		IA		76.5	BNPFT20030314CCK	93 50 29.0		341	University Of Northern Iowa			
271D	632743	APP _V_		327.9	9.4	41 39 19.0	0.010	4.4	3.2	-7.8*<		-12.9<
Grimes		IA		147.8	BNPFT20030310AXZ	93 42 05.0		284	Calvary Chapel Of Twin Falls			
275D	641811	APP _C_		313.2	13.1	41 39 53.0	0.075	0.6	12.5	1.8		-0.4<
Des Moines		IA		133.1	BNPFT20030317ITF	93 45 24.2		442	Radio Assist Ministry, Inc			

Terrain database is FCC NGDC 30 Sec, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin KM
In & Out distances between contours are shown at closest points. Reference Zone = 2
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.

CHANNEL PRECLUSION STUDY
University Of Northern Iowa
With KPUL moving to channel 269 (I.F. Channels)
Class= D , Pwr=0.25 kW, HAAT= 91 M, COR= 356 M
Average Protected F(50-50)= 12.29 km
Omni-directional

DISPLAY DATES
DATA 04-13-10
SEARCH 04-13-10

REFERENCE
41 35 02. N.
93 38 29. W.

CH CITY	CALL	TYPE ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
--- Channel 215 90.9 MHz. ---										
269D	K269EJ	LIC _CN	0.0	0.0	41 35 02.0	0.250	43.3	12.6	9.5R	-9.5M
Des Moines		IA	0.0	BLFT19980116TD	93 38 29.0	91	356	University Of Northern Iowa		
215C2	KLOX	CP _VX	225.4	79.8	41 04 38.0	45.000	137.9	53.4	-70.4*<	-16.7<
Creston		IA	44.9	BPED20080909ADS	94 19 09.0	155	535	Florida Public Radio, Inc.		
217C2	KDFR	LIC DCX	69.2	10.2	41 36 59.0	32.000	5.4	49.1	-7.7*<	-40.0*<
Des Moines		IA	249.3	BLED20030923ABC	93 31 36.0	136	405	Family Stations, Inc.		
215C	KUNI	LIC _CY	60.5	168.4	42 18 59.0	100.000	192.9	88.5	-36.8*<	38.3
Cedar Falls		IA	241.7	BMLED19841106LW	91 51 31.0	524	799	University Of Northern Iowa		
215A	KLOX	LIC _VX	227.6	83.5	41 04 29.0	4.000	82.3	27.1	-11.4<	15.8
Creston		IA	47.1	BLED20080908ACD	94 22 35.0	102	489	Florida Public Radio, Inc.		
213D	K213DV	LIC _C_	86.3	8.6	41 35 20.0	0.062	0.6	12.4	-4.9*<	-4.9*<
Pleasant Hill		IA	266.3	BMLFT20061206AEZ	93 32 17.0		433	Educational Media Foundati		
269A	KPUL	USR _	228.4	30.6	41 24 02.0	6.000	88.6	28.8	9.5R	21.1M
Winterset		IA	48.2		93 54 58.0	100	396			
--- Channel 216 91.1 MHz. ---										
269D	K269EJ	LIC _CN	0.0	0.0	41 35 02.0	0.250	43.3	12.6	9.5R	-9.5M
Des Moines		IA	0.0	BLFT19980116TD	93 38 29.0	91	356	University Of Northern Iowa		
217C2	KDFR	LIC DCX	69.2	10.2	41 36 59.0	32.000	73.0	49.1	-75.3*<	-57.4*<
Des Moines		IA	249.3	BLED20030923ABC	93 31 36.0	136	405	Family Stations, Inc.		
216C	KTPR	LIC _CX	335.4	151.1	42 49 03.0	100.000	175.1	74.2	-37.1*<	33.1
Fort Dodge		IA	154.9	BLED20070911ABL	94 24 41.0	326	676	Iowa State University Of S		
215C2	KLOX	CP _VX	225.4	79.8	41 04 38.0	45.000	79.3	53.5	-11.8<	8.5
Creston		IA	44.9	BPED20080909ADS	94 19 09.0	155	535	Florida Public Radio, Inc.		
213D	K213DV	LIC _C_	86.3	8.6	41 35 20.0	0.062	0.6	12.4	-4.9*<	-4.9*<
Pleasant Hill		IA	266.3	BMLFT20061206AEZ	93 32 17.0		433	Educational Media Foundati		
269A	KPUL	USR _	228.4	30.6	41 24 02.0	6.000	88.6	28.8	9.5R	21.1M
Winterset		IA	48.2		93 54 58.0	100	396			

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"*"affixed to 'IN' or 'OUT' values = site inside protected contour.