

**October 2009**  
**New(FM) Channel 238A**  
**Twentynine Palms Base, CA**  
**Section 307(b) Analysis Engineering**

Sunnylands Broadcasting was the winning bidder for Permit MM-FM633-A (Channel 237A at Amboy, California) in FM Auction #79. By the instant application, it is proposed to implement that allotment, simultaneous with a modification to Channel 238A at Twentynine Palms Base, California. Unless otherwise noted, all population numbers are from the 2000 Census.

**Spacing Study**

Since the proposed technical facility will require processing under the §73.215 short-spacing rules, a separate location is being specified for the proposed allotment site at Twentynine Palms Base. The attached spacing study shows that the proposed Channel 238A allotment site meets the co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules. This proposal is mutually-exclusive with the existing allotment on Channel 237A at Amboy. The proposed allotment site is suitable for tower construction.

**First Local Service to Twentynine Palms Base**

The attached contour map demonstrates that the proposed allotment will provide 70 dBu service to 100% of Twentynine Palms Base.

The proposed operation will provide the first local service to Twentynine Palms Base, which is listed as a Census Designated Place in the 2000 Census with a population of 8,413 persons. The FCC considers a town or city to be a community for allotment purposes when it is either incorporated or listed in the US Census.

While Amboy will lose its sole allotted local service, that is not believed to be an impediment to the instant proposal because Channel 237A at Amboy is only an allotment and not an operational licensed station. The Commission has previously stated that the loss of a potential service does not raise the same level of concern as that of an existing service.<sup>1</sup> Furthermore, the population of

---

<sup>1</sup> *Old Forge and Black River, New York*, 21 FCC Rcd 2470 (MB 2006), *Pelham and Meigs, Georgia*, 18 FCC Rcd 12187 (MB 2003); *Chatom and Grove Hill, Alabama*, 12 FCC Rcd 7664 (MMB 1997)

Twentynine Palms Base (8,413 persons) is considerably greater than the population of Amboy (estimated in the context of MB Docket No. 02-124 to be 20 persons). Therefore, the instant proposal represents a preferential arrangement of allotments under Priority 3.

Nevertheless, simultaneous with the instant application Sunnylands is filing a Notice of Proposed Rulemaking proposing the allotment of a replacement Class A channel at Amboy, in order to provide continued potential service at that community, and to ensure that there is no loss area associated with the instant proposal.

#### **“Tuck” Study Not Required**

As is demonstrated by the attached map exhibit, Twentynine Palms Base is not located within any Urbanized Area as defined in the 2000 Census, nor does the 70 dBu contour from the proposed allotment site encompass at least 50% of any Urbanized Area. Therefore, this proposal does not trigger the requirement for a “Tuck” study.

#### **Gain and Loss Areas**

There is no overlap of the Twentynine Palms Base 238A gain area and the Amboy 237A loss area. The gain area associated with the proposed reallocation encompasses an area of 2,516 sq km and a population of 39,926 persons. With the addition of Channel 284A at Amboy, there is no loss area associated with this proposal. (It should be noted that even if Channel 284A were to not be allotted at Amboy, the loss area associated with the proposed reallocation encompasses an area of 2,516 sq km and a population of just 27 persons.)

## Loss Area Remaining Services Analysis

Since Channel 284A is proposed for allotment at Amboy, there is no loss area associated with this proposal. For the sake of a complete record, however, a study has been made of the loss area which would result if the Amboy 284A allotment were excluded. As depicted on the attached "Amboy Loss Area Study Map", as a result of the proposed reallocation a small unpopulated white area and a gray area with *de minimis* population would be created.<sup>2</sup> Specifically, zero aural services would remain in an unpopulated 1 sq km area, and one aural service will remain in a 693 sq km area encompassing just 9 persons. Certain other areas would remain underserved, i.e. with fewer than five aural services remaining, but again containing only *de minimis* population.<sup>3</sup>

The following facilities provide service to part or all of the Amboy loss area.

KFI	640 kHz	Los Angeles	(Class A 0.5 mV/m)
KHWY	255B	Essex	
KHWZ	261B1	Ludlow	
KDUQ	273A	Ludlow	
Vacant	280B	Essex	

It is noted that the proposed reallocation (hypothetically ignoring the proposed allotment of Channel 284A at Amboy) would result in the creation of an unpopulated white area and a gray area (1 aural service remaining) encompassing just 9 persons. This is a *de minimis* loss, and is not believed to be an impediment to the grant of the instant application because Amboy 237A is only a vacant

---

<sup>2</sup> In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

<sup>3</sup> 12 persons will be left with 2 services.

allotment and as such is only a potential service. The Commission has previously stated that the loss of a potential service does not raise the same level of concern as that of an existing service.<sup>4</sup>

### Gain Area Existing Services Analysis

The allotment of Channel 238A at Thousand Palms Base will not provide new service to any existing white or gray areas. Certain underserved areas will receive one additional service. Specifically, a 10 sq km area encompassing 36 persons will receive its third aural service, a 32 sq km area encompassing 28 persons will receive its fourth aural service, and a 164 sq km area encompassing 25 persons will receive its fifth aural service.

The following facilities provide service to part or all of the Thousand Palms Base gain area. Letters correspond to contour labels on the attached map exhibit.

A	KFI	640 kHz	Los Angeles (Class A 0.5 mV/m)
B	New CP	201B1	Yucca Valley
C	KPSC	203A	Palm Springs
D	KCRI	207B1	Indio
E	KLRD	211B	Yucaipa
F	KPCV	212A	Coachella
G	KPSH	215A	Coachella
H	KWTH	217B	Barstow
I	KHCS	219A	Palm Desert
J	KQCM	221A	Thermal
K	KKUU	224A	Indio
L	KCLB-FM	229B	Coachella
M	KLOB	234A	Thousand Palms
N	KAJR	240A	Indian Wells
O	KXCM	242A	Joshua Tree
P	KUNA-FM	244A	La Quinta

<sup>4</sup> *Old Forge and Black River, New York, 21 FCC Rcd 2470 (MB 2006), Pelham and Meigs, Georgia, 18 FCC Rcd 12187 (MB 2003); Chatom and Grove Hill, Alabama, 12 FCC Rcd 7664 (MMB 1997)*

Q	KRCK-FM	249A	Mecca
R	KWXY-FM	253B	Cathedral City
S	KMRJ	258A	Rancho Mirage
T	KHWZ	261B1	Ludlow
U	KPSI-FM	263B1	Palm Springs
V	vacant	270A	Twentynine Palms
W	KEZN	276A	Palm Desert
X	vacant	278A	Coachella
Y	KPLM	291B	Palm Springs
Z	KDGL	295B	Yucca Valley
AA	KCDZ	299B	Twentynine Palms

**Conclusion**

Based on the preceding analysis, grant of the instant proposal would be consistent with precedent and in the public interest, and represents a preferential arrangement of allotments.

=====

SEARCH PARAMETERS FM Database Date: 090921

Channel: 238A 95.5 MHz Page 1

Latitude: 34 8 0

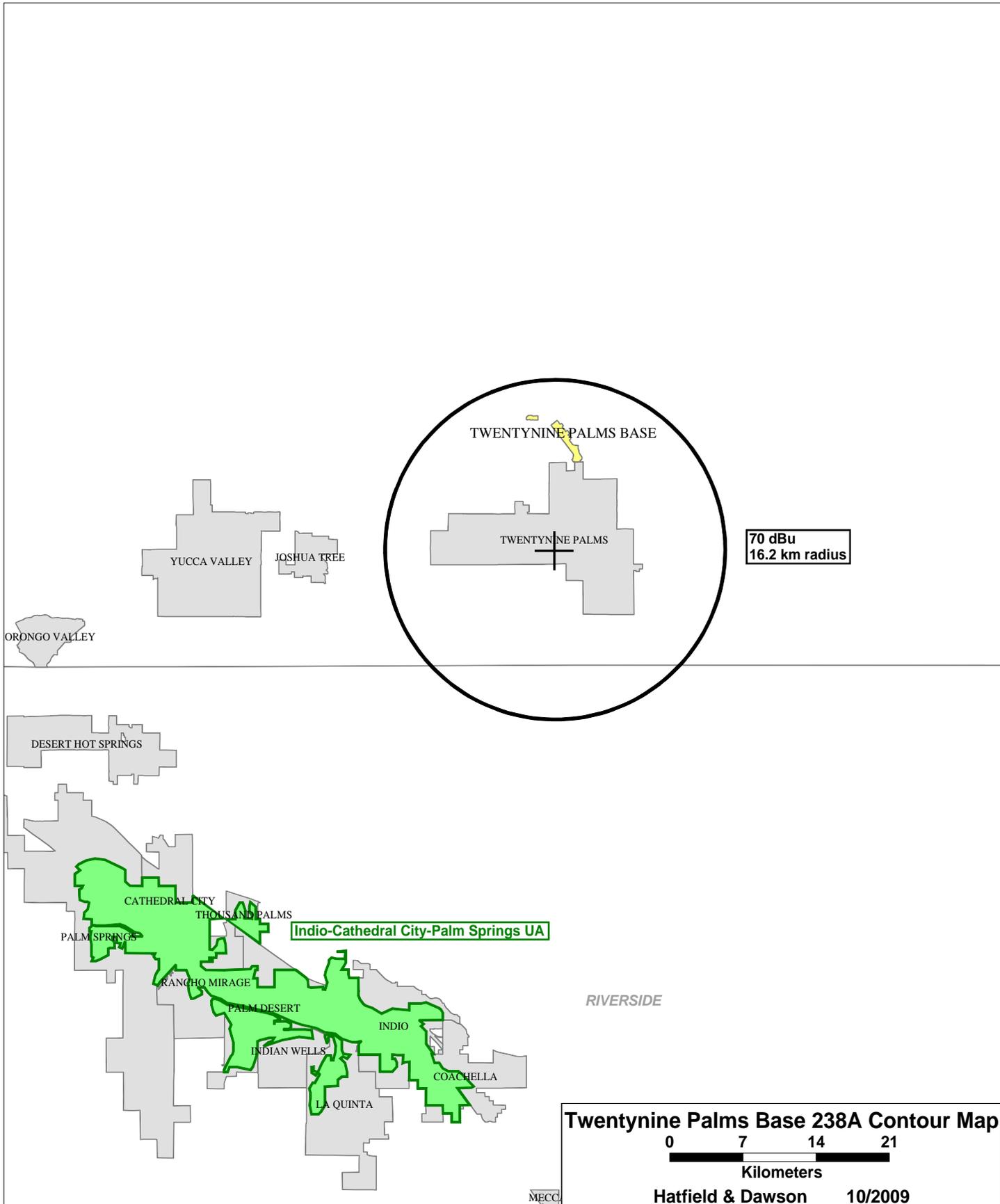
Longitude: 116 3 55

Safety Zone: 32 km

Job Title: TWENTYNINE PALMS BASE 238A ALLOT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
VAC	AMBOY CA	RM-10446	237A 95.3	0.000 0.0	34-36-00 115-40-52	34.1	62.68 -9.32	72 SHORT
K237EN LIC	YUCCA VALLEY CA	BLFT-71004AAA	237D 95.3	0.010 665.0	34-04-55 116-20-34	257.5	26.23 0.00	0 TRANS
NEW-T APP	BRAWLEY CA	BNPFT-30317CKJ	238D 95.5	0.019 109.0	32-57-12 115-30-05	158.1	140.97 0.00	0 TRANS
KLOS LIC	LOS ANGELES CA	BLH-840702CP	238B 95.5	63.000 954.0	34-13-37 118-03-58	273.8	184.75 6.75	178 CLOSE
KLOSaux LIC	LOS ANGELES CA	BMLH-70524ADX	238B 95.5	72.000 890.0	34-13-37 118-03-58	273.8	184.75 0.00	0 AUX
KLOSaux LIC	LOS ANGELES CA	BXLH-60410AES	238B 95.5	50.000 893.0	34-12-46 118-03-42	273.3	184.28 0.00	0 AUX
K238AK LIC	PALM DESERT CA	BLFT-80716AHG	238D 95.5	0.025 526.0	33-48-04 116-13-28	201.7	39.68 0.00	0 TRANS
K238BB LIC	PALM SPRINGS CA	BLFT-80109AAY	238D 95.5	0.006 431.0	33-51-58 116-26-05	229.0	45.21 0.00	0 TRANS
KWNR CP	HENDERSON NV	BPH-80327ACG	238C 95.5	100.000 452.0	36-00-28 115-00-21	24.5	229.31 3.31	226 CLOSE
KWNR LIC	HENDERSON NV	BLH-890629KB	238C 95.5	100.000 354.0	36-00-31 115-00-22	24.5	229.38 3.38	226 CLOSE
	BLYTHE CA	RM-coord-11	239B 95.7	0.000 0.0	33-40-35 114-35-07	110.0	145.97 32.97	113 CLEAR
KAJR LIC	INDIAN WELLS CA	BLH-70911ACV	240A 95.9	1.750 189.0	33-48-04 116-13-28	201.7	39.68 8.68	31 CLOSE
KPLM-FM1 LIC	JOSHUA TREE & TWENTY CA	BLFTB-90831AAL	291D 106.1	0.200 86.0	34-09-16 116-11-51	281.0	12.42 0.00	0 BOOST
KPLM LIC	PALM SPRINGS CA	BLH-981105KC	291B 106.1	50.000 121.0	33-52-14 116-13-39	207.1	32.77 17.77	15 CLEAR

44444 END OF FM SPACING STUDY FOR CHANNEL 238 44444



SAN BERNARDINO

Existing Allotment  
Amboy 237A  
60 dBu -- 28.3 km radius

Proposed Allotment  
Amboy 284A  
60 dBu -- 28.3 km radius

**no change**

**+1 service**

Proposed Allotment  
Twentynine Palms Base 238A  
60 dBu -- 28.3 km radius

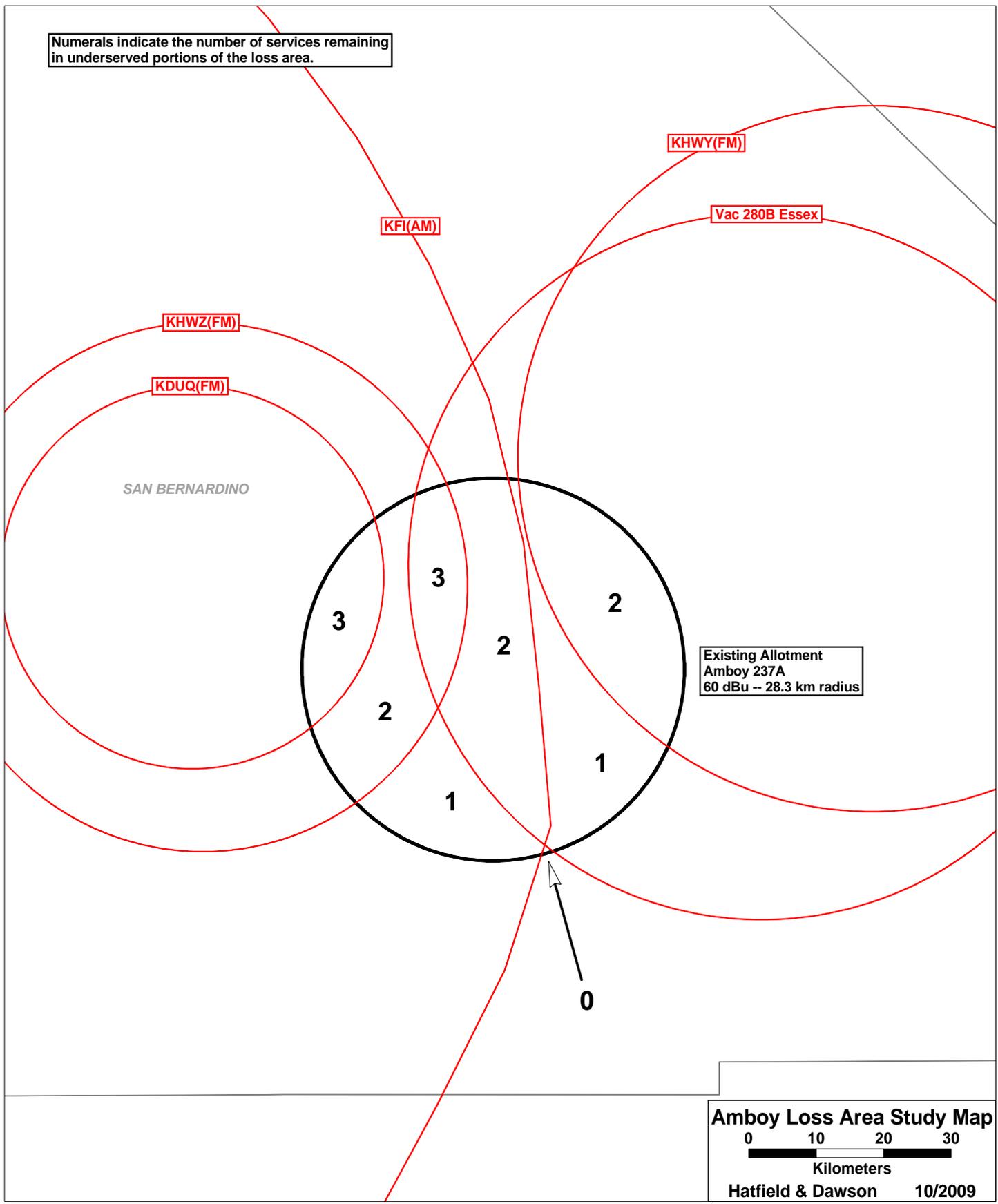
RIVERSIDE

**Gain and Loss Area Study Map**



Hatfield & Dawson 10/2009

Numerals indicate the number of services remaining in underserved portions of the loss area.

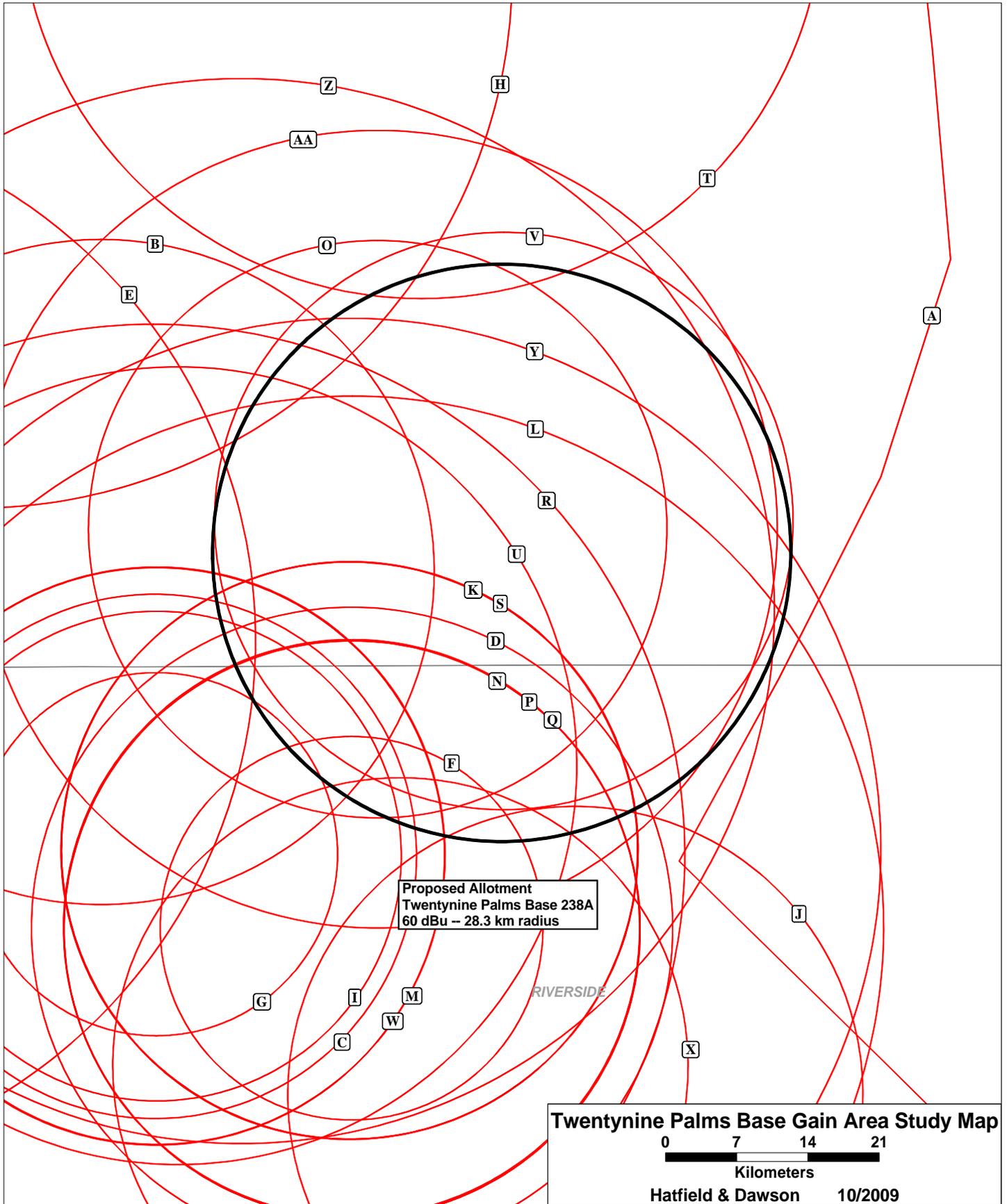


Existing Allotment  
Amboy 237A  
60 dBu -- 28.3 km radius

**Amboy Loss Area Study Map**

0 10 20 30  
Kilometers

Hatfield & Dawson 10/2009



Proposed Allotment  
Twentynine Palms Base 238A  
60 dBu – 28.3 km radius

RIVERSIDE

**Twentynine Palms Base Gain Area Study Map**



Hatfield & Dawson 10/2009