

## K241CH FCC Form 349 Minor Change Request

### Mexican Compliance

The “*Agreement Between The Government of the United States of America and the Government of the United Mexican States*” of 1992, Annex 1, Section 2, defines the current regulation concerning translators located within 320 km of the Mexican border as follows:

#### *2.1 Low Power FM Stations (LPFM)*

*2.1.1 LPFM stations may operate on any channel from 201 to 300 and they must protect the allotments and assignments of the other Administration based on their maximum permitted parameters in accordance with the Table of Allotment's and Assignments.*

*2.1.2 An LPFM station is permitted to operate with ERP that shall not exceed 50 watts in the direction of the other country and to produce an interfering contour not to exceed 32 km in the direction of the other country.*

*2.1.3 The maximum distance to the protected contour (60 dBu) of an LPFM station shall be 8.7 km in the direction of the other country.*

*2.1.4 LPFM stations located within 125 km of the common border must be notified in accordance with the notification procedures in Article 8.*

*2.1.5 An LPFM station located in excess of 125 km from the common border may operate with an ERP in excess of 50 watts in the direction of the other country, provided the protected contour produced is not greater than, starting from 125 km from the common border, 8.7 km in the direction of the other country. Before the station can commence operation it must comply with a notification procedures contained in Article 8 and the provisions of 2.1.1, 2.1.6, and 2.1.7 of this section.*

*2.1.6 Should any interference be caused by an LPFM station, the offending station must immediately correct the interference or cease operation.*

*2.1.7 The use of a channel by an LPFM station shall not prejudice in any manner the future allotment of such channel by the other Administration.*

The proposed translator is located 21.4 km from the Mexican border; as such, it falls under the provisions of the Agreement, Sections 2.1.1, 2.1.2, 2.1.3, and 2.1.4 (LPFM stations not in excess of 125 km from the common border).

Compliance with Section 2.1.1: This is demonstrated in the Attached Channel Study showing the proper distances to the Mexican Allotments. The azimuth to Mexico from the proposed transmitter site is from 110 degrees to 190 degrees as shown on the attached compliance map.

Compliance with Section 2.1.5: LPFM stations within 125 km from the border must certify that their relevant interfering contour in the direction of the other country should not exceed 32 km. The protected co-channel facility herein is XHAD-FM which is a Class B facility. Therefore, the protected interfering contour is the [34 dBu F(50,10) of the proposed facility. The attached Exhibit demonstrates that the maximum distance toward Mexico is 28.8 km. All other azimuths less than 110 degrees are only toward US mainland, and all other azimuths greater than 190 degrees are over the Pacific Ocean.

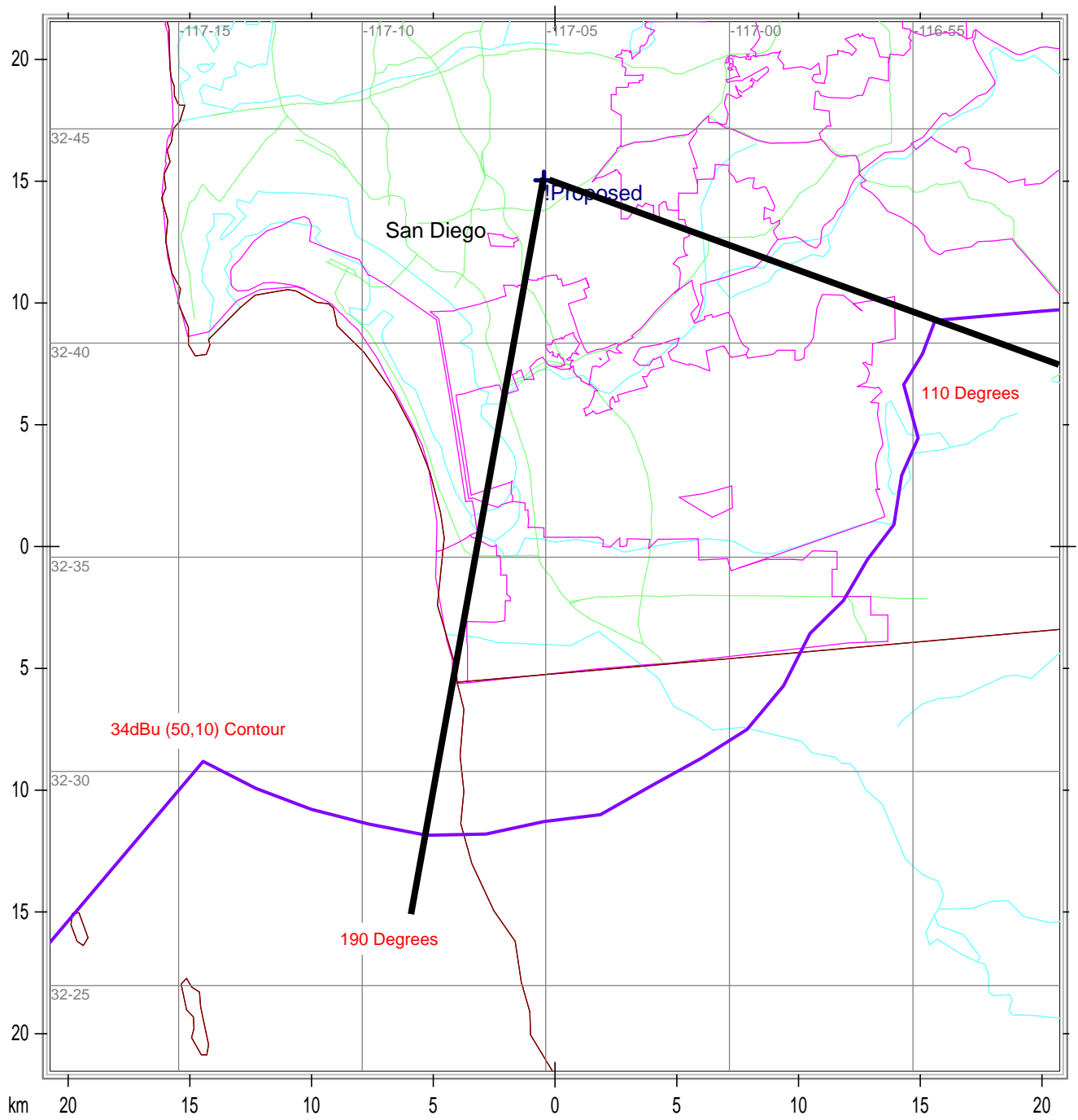
Additionally, as the facility operates at more than 50 watts Effective Radiated Power, the Distance to Contour Chart demonstrates that the distance to the 60dBu (50,50) protected contour does not extend toward Mexico by more than 5.9 km. All other azimuths less than 110 degrees are only toward US mainland, and all other azimuths greater than 190 degrees are over the Pacific Ocean.

The Antenna Data chart in this exhibit shows the maximum ERP toward Mexico is 0.078 kW (7.8 Watts) at the azimuths between 110 and 190 degrees. All other azimuths less than 110 degrees are only toward US mainland, and all other azimuths greater than 190 degrees are over the Pacific Ocean.

Therefore this proposal completely satisfies the requirements of the Agreement in all relevant sections. The applicant respectfully requests that the Mexican Government be immediately notified in accordance with established procedure for a low power fm application filed in proximity to the Mexican border.

ComStudy 2.2  
Search of channel 295  
(106.9 MHz Class D)  
at  
32-43-48.0 N, 117-05-03.0 W.

| CALL     | CITY   | ST CHN CL | DIST   | SEP    | BRNG  | CLEARANCE |
|----------|--|-----------|--------|--------|-------|-----------|
| KLNV     | SAN DIEGO  | CA 293 B  | 1.62   | 69.00  | 125.0 | -81.37 dB |
|          | Adjacent Channel Waiver Requested in Narrative               |           |        |        |       |           |
| XHFG-FM  | TIJUANA  | BN 297 C1 | 33.33  | 75.00  | 148.5 | -21.09 dB |
|          | Adjacent Channel Waiver Requested in Narrative               |           |        |        |       |           |
| K241CH   | SAN DIEGO  | CA 241 D  | 7.37   | 0.00   | 319.6 | 7.40 km   |
|          | This Facility - Minor Change to Intermediate Channel Request |           |        |        |       |           |
| KSSD     | FALLBROOK  | CA 296 A  | 73.14  | 72.00  | 352.4 | 8.39 dB   |
| KDGL     | YUCCA VALLEY   | CA 295 B  | 165.06 | 178.00 | 24.4  | 12.41 dB  |
| KYDO-FM1 | SANTEE   | CA 241 D  | 14.59  | 0.00   | 104.3 | 14.60 km  |
| XHADAFM  | ENSENADA   | BN 295 B  | 105.74 | 178.00 | 156.5 | 15.27 dB  |
| XHADAFM  | ENSENADA   | BN 295 B  | 106.05 | 178.00 | 156.5 | 15.19 dB  |
| KLNV-FM1 | RANCHO BERNARDO  | CA 293 D  | 31.84  | 0.00   | 7.4   | 18.03 dB  |
| KDGL-FM1 | PALM SPRINGS   | CA 295 D  | 139.79 | 0.00   | 25.4  | 20.48 dB  |
| KLVE     | LOS ANGELES  | CA 298 B  | 189.70 | 69.00  | 331.6 | 20.59 dB  |
| K294CS   | FALLBROOK  | CA 294 D  | 75.02  | 0.00   | 352.5 | 21.24 dB  |
| KSSD     | FALLBROOK  | CA 296 A  | 73.14  | 72.00  | 352.4 | 22.29 dB  |
| KDGL     | YUCCA VALLEY   | CA 295 B  | 165.06 | 178.00 | 24.4  | 24.58 dB  |
| K295AI   | MUSCOY   | CA 295 D  | 171.13 | 0.00   | 351.4 | 26.68 dB  |
| KROQ-FM  | PASADENA   | CA 294 B  | 195.92 | 113.00 | 326.6 | 27.64 dB  |
| KROQ-FM  | PASADENA   | CA 294 B  | 195.92 | 113.00 | 326.6 | 27.53 dB  |
| KROQ-FM  | PASADENA   | CA 294 B  | 189.69 | 113.00 | 327.4 | 28.53 dB  |
| KLVE     | LOS ANGELES  | CA 298 B  | 189.67 | 69.00  | 327.4 | 30.25 dB  |
| K260CG   | SAN DIEGO  | CA 241 D  | 32.70  | 0.00   | 18.7  | 32.70 km  |
| XEWVFM   | MEXICALI   | BN 294 B1 | 151.47 | 96.00  | 93.0  | 34.15 dB  |
| XEWVFM   | MEXICALI   | BN 294 B1 | 151.47 | 96.00  | 93.0  | 34.15 dB  |
| KSSE     | ARCADIA  | CA 296 A  | 183.25 | 72.00  | 331.8 | 35.21 dB  |
| K241AV   | BAKER  | CA 296 D  | 123.61 | 0.00   | 5.3   | 35.55 dB  |
| KXO-FM   | EL CENTRO  | CA 298 B  | 144.42 | 69.00  | 86.2  | 37.73 dB  |
| KALI-FM  | SANTA ANA  | CA 292 A  | 134.55 | 31.00  | 328.1 | 39.82 dB  |
|          | CIUDAD MORELOS   | BN 296 B  | 209.82 | 125.00 | 92.3  | 39.83 dB  |



State Borders City Borders Highways Water Features Lat/Lon Grid

# K241CH FCC Form 349

## Minor Change Request

### DISTANCE TO INTERFERING CONTOUR CHART – 34dBu (50,10)

Callsign : !Proposed

Coordinates : 32-43-48.0 N, 117-05-03.0 W

Frequency (MHz): 106.90000

HAAT (m): 142.84 AMSL (m): 231.00

Elevation (m): 76.00 Tower AGL (m): 155.00

ERP (w): 250

City/State : SAN DIEGO, CA Contour type : F(50,10)

Signal strength : 34.000 dBu

Contour HAAT (m) : 140.4

Brg AT HAAT Dist Brg AT HAAT Dist Brg AT HAAT Dist Brg AT HAAT Dist

|    |     |     |      |     |     |     |      |     |    |     |      |     |    |     |      |
|----|-----|-----|------|-----|-----|-----|------|-----|----|-----|------|-----|----|-----|------|
| 0  | 125 | 106 | 61.3 | 90  | 155 | 76  | 55.1 | 180 | 28 | 203 | 27.7 | 270 | 38 | 193 | 74.6 |
| 5  | 158 | 73  | 54.4 | 95  | 176 | 55  | 44.1 | 185 | 18 | 213 | 28.4 | 275 | 36 | 195 | 74.8 |
| 10 | 152 | 79  | 55.9 | 100 | 198 | 33  | 29.0 | 190 | 12 | 219 | 28.8 | 280 | 41 | 190 | 74.2 |
| 15 | 145 | 86  | 57.5 | 105 | 213 | 18  | 21.8 | 195 | 11 | 220 | 28.8 | 285 | 40 | 191 | 74.3 |
| 20 | 159 | 72  | 54.1 | 110 | 182 | 49  | 17.7 | 200 | 9  | 222 | 29.0 | 290 | 39 | 192 | 74.5 |
| 25 | 166 | 65  | 52.2 | 115 | 168 | 63  | 17.7 | 205 | 8  | 223 | 29.0 | 295 | 44 | 187 | 73.8 |
| 30 | 149 | 82  | 56.6 | 120 | 144 | 87  | 17.7 | 210 | 8  | 223 | 29.0 | 300 | 51 | 180 | 72.9 |
| 35 | 151 | 80  | 56.1 | 125 | 129 | 102 | 19.4 | 215 | 8  | 223 | 58.1 | 305 | 61 | 170 | 71.6 |
| 40 | 159 | 72  | 54.1 | 130 | 125 | 106 | 19.8 | 220 | 7  | 224 | 72.4 | 310 | 64 | 167 | 71.2 |
| 45 | 161 | 70  | 53.6 | 135 | 113 | 118 | 21.0 | 225 | 8  | 223 | 75.4 | 315 | 78 | 153 | 69.1 |
| 50 | 157 | 74  | 54.6 | 140 | 109 | 122 | 21.4 | 230 | 9  | 222 | 78.1 | 320 | 85 | 146 | 68.0 |
| 55 | 164 | 67  | 52.8 | 145 | 100 | 131 | 22.2 | 235 | 10 | 221 | 78.0 | 325 | 93 | 138 | 66.7 |
| 60 | 177 | 54  | 48.5 | 150 | 95  | 136 | 22.6 | 240 | 12 | 219 | 77.7 | 330 | 93 | 138 | 66.7 |
| 65 | 191 | 40  | 41.5 | 155 | 78  | 153 | 24.1 | 245 | 16 | 215 | 77.3 | 335 | 94 | 137 | 66.5 |
| 70 | 185 | 46  | 44.8 | 160 | 64  | 167 | 25.3 | 250 | 18 | 213 | 77.0 | 340 | 90 | 141 | 67.2 |
| 75 | 165 | 66  | 52.5 | 165 | 56  | 175 | 25.9 | 255 | 24 | 207 | 76.3 | 345 | 88 | 143 | 67.5 |
| 80 | 144 | 87  | 57.7 | 170 | 46  | 185 | 26.6 | 260 | 26 | 205 | 76.1 | 350 | 97 | 134 | 66.0 |
| 85 | 146 | 85  | 57.2 | 175 | 31  | 200 | 27.5 | 265 | 26 | 205 | 76.1 | 355 | 99 | 132 | 65.7 |

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## Minor Change Request

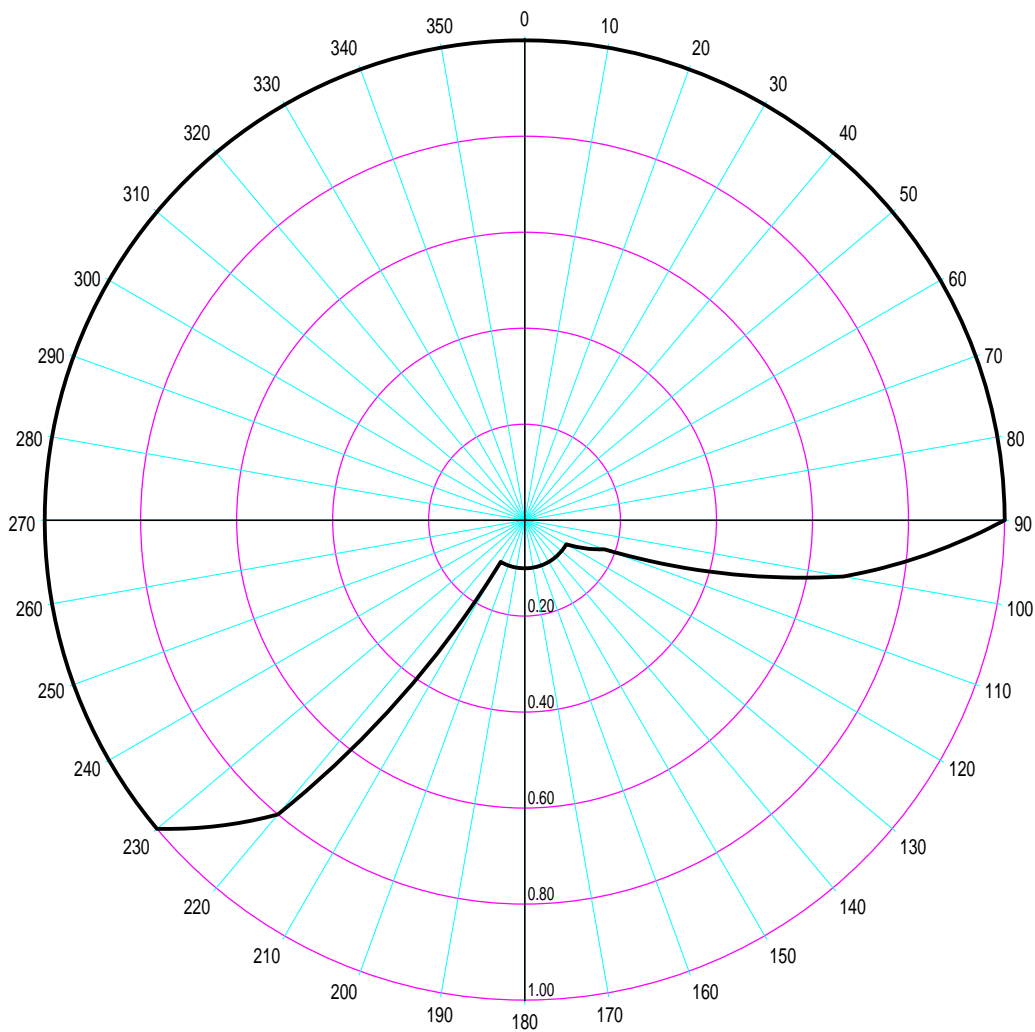
### DISTANCE TO INTERFERING CONTOUR CHART – 60dBu (50,50)

Contour type : F(50,50)

Signal strength : 60.000 dBu

Contour HAAT (m) : 140.4

| Brg AT |     |     |      | HAAT  |     |     |      | Dist  |    |     |      | Brg AT |    |     |      | HAAT  |  |  |  | Dist  |  |  |  | Brg AT |  |  |  | HAAT  |  |  |  | Dist  |  |  |  |
|--------|-----|-----|------|-------|-----|-----|------|-------|----|-----|------|--------|----|-----|------|-------|--|--|--|-------|--|--|--|--------|--|--|--|-------|--|--|--|-------|--|--|--|
| -----  |     |     |      | ----- |     |     |      | ----- |    |     |      | -----  |    |     |      | ----- |  |  |  | ----- |  |  |  | -----  |  |  |  | ----- |  |  |  | ----- |  |  |  |
| 0      | 125 | 106 | 13.2 | 90    | 155 | 76  | 11.3 | 180   | 28 | 203 | 5.7  | 270    | 38 | 193 | 18.2 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 5      | 158 | 73  | 11.1 | 95    | 176 | 55  | 8.9  | 185   | 18 | 213 | 5.8  | 275    | 36 | 195 | 18.3 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 10     | 152 | 79  | 11.5 | 100   | 198 | 33  | 6.1  | 190   | 12 | 219 | 5.9  | 280    | 41 | 190 | 18.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 15     | 145 | 86  | 12.0 | 105   | 213 | 18  | 4.6  | 195   | 11 | 220 | 5.9  | 285    | 40 | 191 | 18.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 20     | 159 | 72  | 11.0 | 110   | 182 | 49  | 3.8  | 200   | 9  | 222 | 5.9  | 290    | 39 | 192 | 18.2 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 25     | 166 | 65  | 10.5 | 115   | 168 | 63  | 3.8  | 205   | 8  | 223 | 5.9  | 295    | 44 | 187 | 17.9 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 30     | 149 | 82  | 11.7 | 120   | 144 | 87  | 3.8  | 210   | 8  | 223 | 5.9  | 300    | 51 | 180 | 17.6 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 35     | 151 | 80  | 11.6 | 125   | 129 | 102 | 4.1  | 215   | 8  | 223 | 13.0 | 305    | 61 | 170 | 17.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 40     | 159 | 72  | 11.0 | 130   | 125 | 106 | 4.2  | 220   | 7  | 224 | 17.5 | 310    | 64 | 167 | 16.9 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 45     | 161 | 70  | 10.9 | 135   | 113 | 118 | 4.4  | 225   | 8  | 223 | 18.5 | 315    | 78 | 153 | 16.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 50     | 157 | 74  | 11.2 | 140   | 109 | 122 | 4.5  | 230   | 9  | 222 | 19.5 | 320    | 85 | 146 | 15.7 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 55     | 164 | 67  | 10.7 | 145   | 100 | 131 | 4.6  | 235   | 10 | 221 | 19.5 | 325    | 93 | 138 | 15.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 60     | 177 | 54  | 9.7  | 150   | 95  | 136 | 4.7  | 240   | 12 | 219 | 19.4 | 330    | 93 | 138 | 15.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 65     | 191 | 40  | 8.1  | 155   | 78  | 153 | 5.0  | 245   | 16 | 215 | 19.2 | 335    | 94 | 137 | 15.1 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 70     | 185 | 46  | 8.8  | 160   | 64  | 167 | 5.2  | 250   | 18 | 213 | 19.1 | 340    | 90 | 141 | 15.3 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 75     | 165 | 66  | 10.6 | 165   | 56  | 175 | 5.3  | 255   | 24 | 207 | 18.8 | 345    | 88 | 143 | 15.5 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 80     | 144 | 87  | 12.0 | 170   | 46  | 185 | 5.5  | 260   | 26 | 205 | 18.8 | 350    | 97 | 134 | 14.9 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |
| 85     | 146 | 85  | 11.9 | 175   | 31  | 200 | 5.7  | 265   | 26 | 205 | 18.8 | 355    | 99 | 132 | 14.8 |       |  |  |  |       |  |  |  |        |  |  |  |       |  |  |  |       |  |  |  |



| Azim | Rel.FS | ERP [W] | dBk    | Azim  | Rel.FS | ERP [W] | dBk     | Azim  | Rel.FS | ERP [W] | dBk     | Azim  | Rel.FS | ERP [W] | dBk    |
|------|--------|---------|--------|-------|--------|---------|---------|-------|--------|---------|---------|-------|--------|---------|--------|
| 0.0  | 1.000  | 250.000 | -6.021 | 90.0  | 1.000  | 250.000 | -6.021  | 180.0 | 0.100  | 2.500   | -26.021 | 270.0 | 1.000  | 250.000 | -6.021 |
| 5.0  | 1.000  | 250.000 | -6.021 | 95.0  | 0.837  | 175.142 | -7.566  | 185.0 | 0.100  | 2.500   | -26.021 | 275.0 | 1.000  | 250.000 | -6.021 |
| 10.0 | 1.000  | 250.000 | -6.021 | 100.0 | 0.674  | 113.569 | -9.447  | 190.0 | 0.100  | 2.500   | -26.021 | 280.0 | 1.000  | 250.000 | -6.021 |
| 15.0 | 1.000  | 250.000 | -6.021 | 105.0 | 0.425  | 45.156  | -13.453 | 195.0 | 0.100  | 2.500   | -26.021 | 285.0 | 1.000  | 250.000 | -6.021 |
| 20.0 | 1.000  | 250.000 | -6.021 | 110.0 | 0.177  | 7.832   | -21.061 | 200.0 | 0.100  | 2.500   | -26.021 | 290.0 | 1.000  | 250.000 | -6.021 |
| 25.0 | 1.000  | 250.000 | -6.021 | 115.0 | 0.138  | 4.761   | -23.223 | 205.0 | 0.100  | 2.500   | -26.021 | 295.0 | 1.000  | 250.000 | -6.021 |
| 30.0 | 1.000  | 250.000 | -6.021 | 120.0 | 0.100  | 2.500   | -26.021 | 210.0 | 0.100  | 2.500   | -26.021 | 300.0 | 1.000  | 250.000 | -6.021 |
| 35.0 | 1.000  | 250.000 | -6.021 | 125.0 | 0.100  | 2.500   | -26.021 | 215.0 | 0.450  | 50.625  | -12.956 | 305.0 | 1.000  | 250.000 | -6.021 |
| 40.0 | 1.000  | 250.000 | -6.021 | 130.0 | 0.100  | 2.500   | -26.021 | 220.0 | 0.800  | 160.000 | -7.959  | 310.0 | 1.000  | 250.000 | -6.021 |
| 45.0 | 1.000  | 250.000 | -6.021 | 135.0 | 0.100  | 2.500   | -26.021 | 225.0 | 0.900  | 202.500 | -6.936  | 315.0 | 1.000  | 250.000 | -6.021 |
| 50.0 | 1.000  | 250.000 | -6.021 | 140.0 | 0.100  | 2.500   | -26.021 | 230.0 | 1.000  | 250.000 | -6.021  | 320.0 | 1.000  | 250.000 | -6.021 |
| 55.0 | 1.000  | 250.000 | -6.021 | 145.0 | 0.100  | 2.500   | -26.021 | 235.0 | 1.000  | 250.000 | -6.021  | 325.0 | 1.000  | 250.000 | -6.021 |
| 60.0 | 1.000  | 250.000 | -6.021 | 150.0 | 0.100  | 2.500   | -26.021 | 240.0 | 1.000  | 250.000 | -6.021  | 330.0 | 1.000  | 250.000 | -6.021 |
| 65.0 | 1.000  | 250.000 | -6.021 | 155.0 | 0.100  | 2.500   | -26.021 | 245.0 | 1.000  | 250.000 | -6.021  | 335.0 | 1.000  | 250.000 | -6.021 |
| 70.0 | 1.000  | 250.000 | -6.021 | 160.0 | 0.100  | 2.500   | -26.021 | 250.0 | 1.000  | 250.000 | -6.021  | 340.0 | 1.000  | 250.000 | -6.021 |
| 75.0 | 1.000  | 250.000 | -6.021 | 165.0 | 0.100  | 2.500   | -26.021 | 255.0 | 1.000  | 250.000 | -6.021  | 345.0 | 1.000  | 250.000 | -6.021 |
| 80.0 | 1.000  | 250.000 | -6.021 | 170.0 | 0.100  | 2.500   | -26.021 | 260.0 | 1.000  | 250.000 | -6.021  | 350.0 | 1.000  | 250.000 | -6.021 |
| 85.0 | 1.000  | 250.000 | -6.021 | 175.0 | 0.100  | 2.500   | -26.021 | 265.0 | 1.000  | 250.000 | -6.021  | 355.0 | 1.000  | 250.000 | -6.021 |