

**July 2019**  
**KISN(FM) Channel 244C3**  
**Belgrade, Montana**  
**Allocation Study**

**Background**

The instant application proposes a “one step” modification of KISN, from Channel 244C2 Belgrade to Channel 244C3 Belgrade, at a new transmitter site. Since this is a same-channel downgrade, Commission policy does not require the specification of a fully-spaced allotment site.

**Spacing Study**

The attached spacing study shows that the proposed Channel 244C3 transmitter site meets the co-channel and adjacent channel spacing requirements for Class C3 stations as prescribed in §73.207 of the Commission's Rules, with the exception of a short-spacing to the licensed operation of KQRV on Channel 245C1 at Deer Lodge. This proposal satisfies the minimum spacing requirements which are specified in §73.215(e). Processing pursuant to §73.215 of the Commission's Rules is requested with respect to KQRV.

Despite the fact that the licensed KISN facility operates from a transmitter site which is fully-spaced to KQRV, there is existing overlap of the licensed KISN 54 dBu F(50,10) contour to the licensed KQRV 60 dBu F(50,50) contour, and of the licensed KQRV 100 dBu F(50,10) contour to the licensed KISN 60 dBu F(50,50) contour.

As depicted on the attached allocation study maps and in the following table, implementation of the proposed KISN facility will result in a decrease in the overlap received by both stations.

	KQRV Overlap Received	KISN Overlap Received
Licensed KISN	1,761 sq km	2,481 sq km
Proposed KISN	732 sq km	2,203 sq km
Change	- 1,029 sq km	- 278 sq km

Commission policy permits areas of existing “fully spaced” overlap to be maintained in short-spaced applications so long as the area of overlap is not increased.<sup>1</sup> Therefore, it is believed that the instant application complies with all allocation requirements with respect to KQRV. It is not believed necessary to request a waiver in this situation, but waiver of §73.215 is nevertheless requested to the extent required.

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<sup>1</sup> See, for example: KRBN 232C3 Manton, CA, BPH-20180827AAA; KNOB Healdsburg, CA, BPH-20180227AAQ; KQFO Pasco, WA, BPH-20160315ABS; KWVR-FM Enterprise, OR, BPH-20150630AAG; KLXB Bermuda Dunes, CA, BPH-20150622AFT; KRKZ-FM Chinook, WA, BPH-20130415ACM, and others.

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SEARCH PARAMETERS FM Database Date: 190722

Channel: 244C3 96.7 MHz Page 1

Latitude: 45 38 16

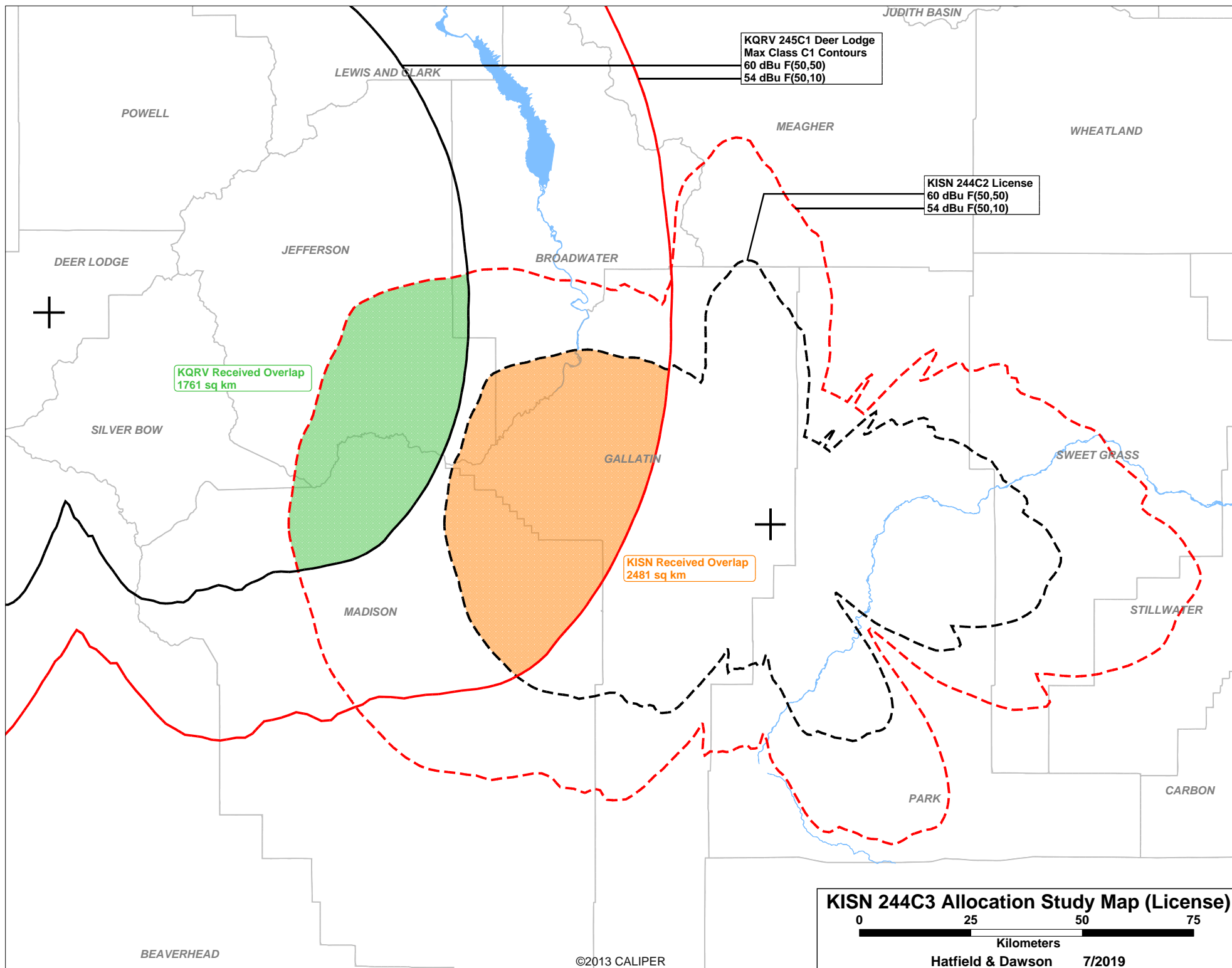
Longitude: 111 16 5

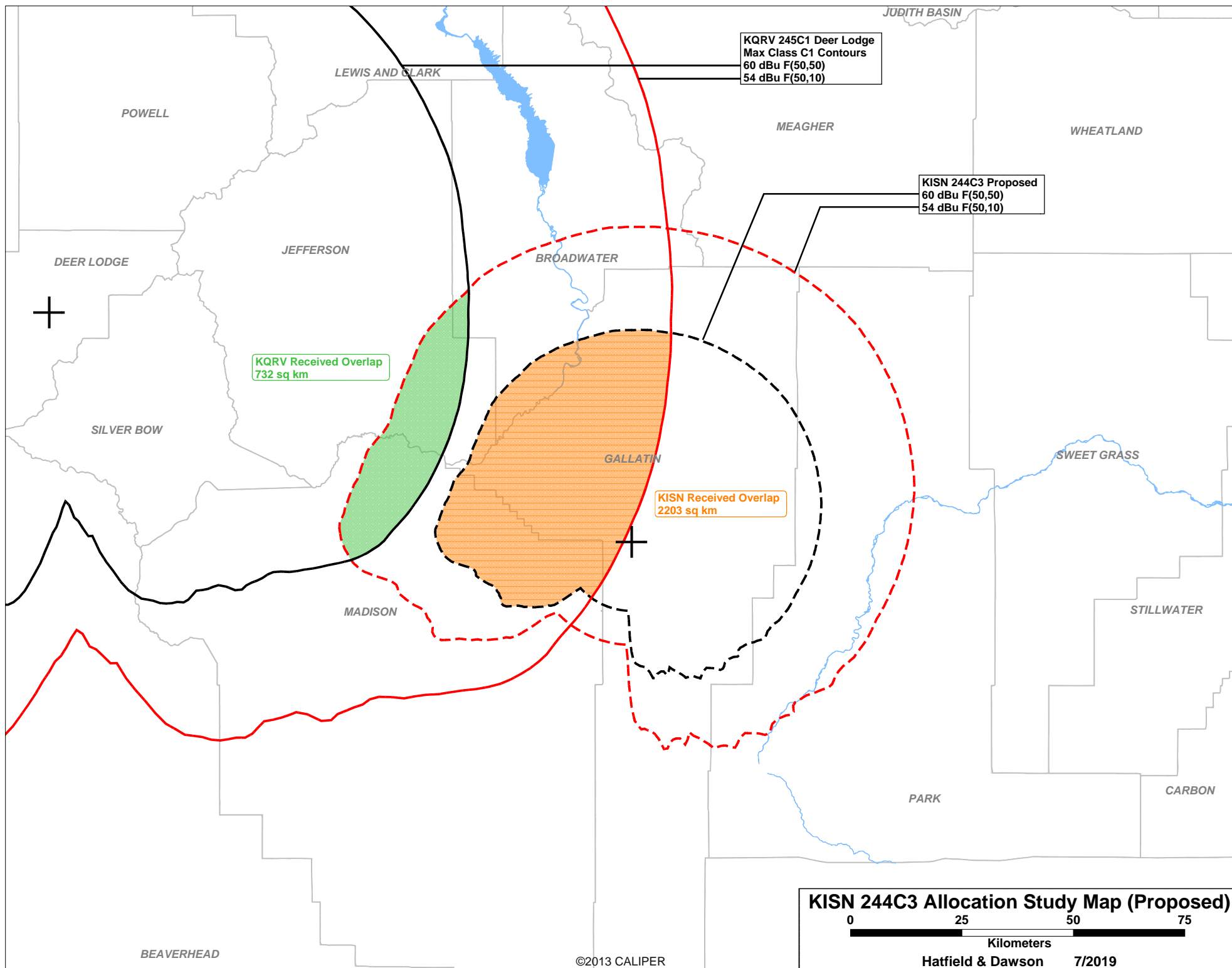
Safety Zone: 32 km

Job Title: KISN 244C3 HIGH FLAT

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K242DC	BIG SKY	242D	0.010	45-16-28	193.6	41.54	0	
LIC	MT BLFT-80726AAF	96.3	639.0	111-23-34		0.00	TRANS	
KISN	BELGRADE	244C2	18.500	45-40-24	82.6	31.49	177	
LIC	MT BLH-60921ABM	96.7	248.0	110-52-02		-145.51	SHORT	
KQRV	DEER LODGE	245C1	20.000	46-06-03	292.2	140.37	144	
LIC	MT BLH-00407ACG	96.9	300.0	112-57-00		-3.63	SHORT	
ABSOLUTE MINIMUM 73.215 SPACING = 133 KM								
K246BA	BOZEMAN	246D	0.028	45-39-59	79.5	17.57	0	
LIC	MT BLFT-00128AGJ	97.1	134.0	111-02-47		0.00	TRANS	
K246BL	LIVINGSTON	246D	0.010 DA	45-41-49	80.2	39.56	0	
LIC	MT BLFT-70821AEN	97.1	-74.0	110-46-03		0.00	TRANS	

===== END OF FM SPACING STUDY FOR CHANNEL 244 =====









Mercator Projection  
NAD27 Conus  
USNG Zone 12TVR  
CalTopo

