

Engineering Statement

Purpose

The instant Form 318 has been prepared on behalf of Zuma Beach FM and Emergency Community Broadcasters, Inc. (“Zuma”), permittee of Low Power FM station KBUU-LP, Malibu, CA, Facility ID 195574, channel 248 (97.5 MHz).

The instant application is being filed as a minor modification to existing construction permit BNPL-20131113BMD. Specifically, Zuma is proposing to change the transmitter location, increase the HAAT and decrease the ERP. Figure 1 shows the overlapping 60 dBu contours of the authorized construction permit and the proposed facilities.

Background

The FCC granted Zuma’s construction permit on March 10, 2014. Since receiving its CP, Zuma has been trying to obtain a local building permit for the authorized transmitter site; however, it does not appear that Zuma will be able to obtain the necessary permits to build a tower at the CP site in a timely manner due to land use and zoning restrictions. Therefore, other transmitter sites have been researched and considered.

Malibu is a uniquely shaped community; it is probably the longest and narrowest city in America. The city limits extend east-west for almost 21 miles (34 kilometers) along the Pacific Ocean, while the average north-south width extends less than 1 mile (1.7 kilometers) into the Santa Monica Mountains. The mountainous terrain, along with local zoning and height restrictions for antenna structures, has made it extremely challenging to find a new transmitter location. Complicating the site search is the fact that Malibu is located within the protected contour of 2nd adjacent KLAX-FM, East Los Angeles; this requires that the KBUU-LP transmitter site not be located in a populated area to avoid predicted interference to the listeners of KLAX-FM.

The proposed transmitter site in the instant application appears to be a suitable location both from a local zoning/permitting perspective and for being able to provide good signal strength to a majority of Malibu residents while meeting FCC interference criteria.

Proposed Facilities and HAAT Calculation

Zuma proposes to construct and operate KBUU-LP with the following parameters:

| | |
|-------------------|------------------------------|
| Channel: | 248 (97.5 MHz) |
| Coordinates: | 34-02-26 / 118-47-20 (NAD27) |
| Ground Elevation: | 282 m |
| Antenna HAGL: | 9 m |
| Antenna HAMSL: | 291 m |
| HAAT: | 50 m |
| ERP: | 0.035 kW |

As per section 73.813 of the rules and regulations, LPFM stations follow the procedures in section 73.313(d) for calculation of HAAT. Because the proposed KBUU-LP transmitter site has radials that go over the Pacific Ocean, and because most computer programs do not automatically account for the portion or the entire radial that goes over the ocean, the HAAT was manually calculated; the tabulation is shown below. The NGDC 30-second terrain database¹, which closely matches the FCC's 30-second terrain database, was used. A sampling interval of 0.2 km was used for the 3.0-16.0 km land portion of each radial. Figure 2 depicts the 3-16 km radials.

| <u>Radial (deg)</u> | <u>AT (m)</u> | <u>HAAT (m)</u> | <u>Comment</u> |
|---------------------|---------------|-------------------------|----------------------------------|
| 0 | 407.8 | -116.8 | |
| 45 | 363.9 | -72.9 | |
| 90 | 87.3 | 203.7 | |
| 135 | - - | - - | Omitted; entirely over the ocean |
| 180 | - - | - - | Omitted; entirely over the ocean |
| 225 | 35.8 | 255.2 | 3-4 km over land |
| 270 | 92.9 | 198.1 | 3-10 km over land |
| 315 | 457.9 | -166.9 | |
| | | <u>300.4</u> / 6 = 50 m | |

After calculating the HAAT, the maximum ERP was then calculated. LP100 stations are allowed a maximum ERP of 100 watts at a HAAT of 30 meters. With a HAAT of 50 meters, the ERP was computed as 35 watts to produce an equivalent maximum facility.

Interference Analysis and 2nd Adjacent Channel Waiver Request

Attached as Table 1 is a spacing study for the proposed KBUU-LP transmitter site. With the exception of KLAX-FM, East Los Angeles on 2nd adjacent channel 250B (97.9 MHz), the proposed KBUU-LP facility is fully spaced from all licensed facilities and pending applications for new stations. The proposed KBUU-LP transmitter site is short-spaced to KLAX-FM by 10.6 km and is located within KLAX-FM's protected 54 dBu contour (see Figure 3). The proposed KBUU-LP transmitter site is 1.3 km closer to KLAX-FM than the currently authorized site.

Section 73.807(e)(1) states:

Waiver of the second-adjacent channel separations. The Commission will entertain requests to waive the second-adjacent channel separations in paragraphs (a) through (c) of this section on a case-by-case basis. In each case, the LPFM station must establish, using methods of predicting interference taking into account all relevant factors, including terrain-sensitive propagation models, that its proposed operations will not result in interference to any authorized radio service. The LPFM station may do so by demonstrating that no actual interference will occur due to intervening terrain or lack of population. The LPFM station may use an undesired/desired signal strength ratio methodology to define areas of potential interference.

¹ Software by EDX Engineering, Inc. was used for extracting the terrain values from the database.

The Commission previously granted Zuma a 2nd adjacent waiver for the currently authorized site based on a non-interference showing using the Desired-to-Undesired methodology to identify potentially affected population. Zuma again respectfully requests that a waiver be granted based on this methodology.

Similar to FM translator stations, LPFM stations use the same D/U ratios shown in 74.1204(a)(1) for protecting short-spaced 2nd and 3rd adjacent full power FM stations. For these stations, the D/U ratio is -40 dB (i.e., the undesired signal has to be 40 dB or more stronger than the desired signal to cause interference).

Referring again to Figure 3, KLAX-FM has a calculated field strength of 61.3 dBu (F50,50) at the proposed KBUU-LP transmitter site; therefore, the interfering contour for identifying potentially affected population is the KBUU-LP 101.3 dBu (F50,10) contour. At the proposed ERP of 35 watts at 50 m HAAT, the KBUU-LP interfering contour has a free-space radius of approximately 360 meters.²

As shown in Figure 4, there is only one residence located within the KBUU-LP 101.3 dBu contour - that of the proposed KBUU-LP transmitter site property owner. The property owner is a supporter of KBUU-LP and has made his land available for the construction of the tower and supporting equipment shed. The property owner has been made aware of the potential for receiving interference to KLAX-FM and has agreed to accept such interference, should it exist.

AFFIDAVIT

I, Timothy P. Schultz, do hereby certify that this Engineering Statement, the accompanying figures and tables, and all technical portions of this application were prepared by me personally. All facts herein are known to be true based on fact, belief and personal experience.

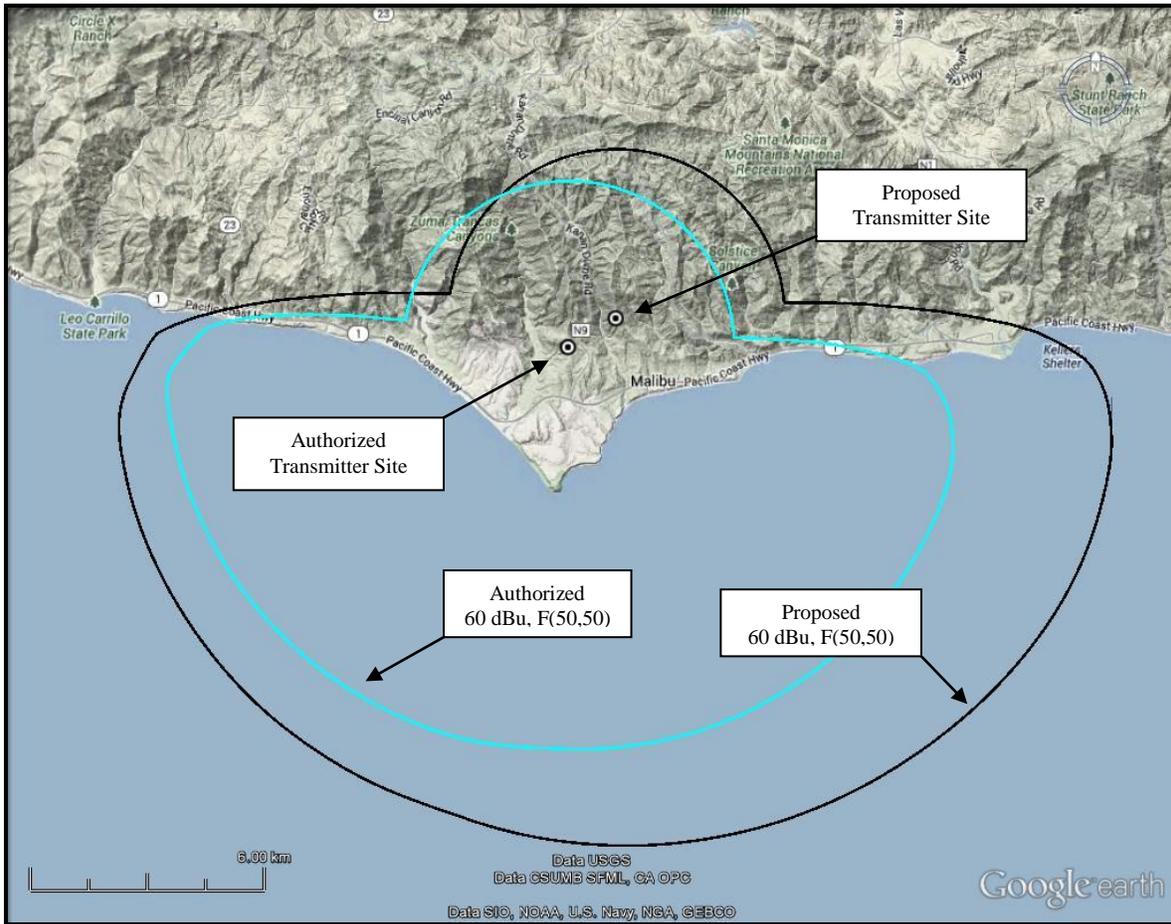
I have been gainfully employed in the broadcast engineering field since 1977, working in all phases of AM, FM and Television engineering. I have prepared several engineering applications for the Commission and have a working knowledge of current FCC Rules and Regulations. I hold valid FCC License PG-11-27583 and am Professionally Certified by the Society of Broadcast Engineers.

Signed: Timothy P. Schultz

Dated: 5-23-14

Timothy P. Schultz, CPBE
7007 Arizona Avenue
Los Angeles, CA 90045

² For contour distances calculated to be less than 1.5 km, the FCC's free-space formula is used.



60 dBu Contour Overlap Map

KBUU-LP, Malibu, CA
Channel 248 (97.5 MHz)
0.035 kW – ND, 50 m HAAT

Figure 1

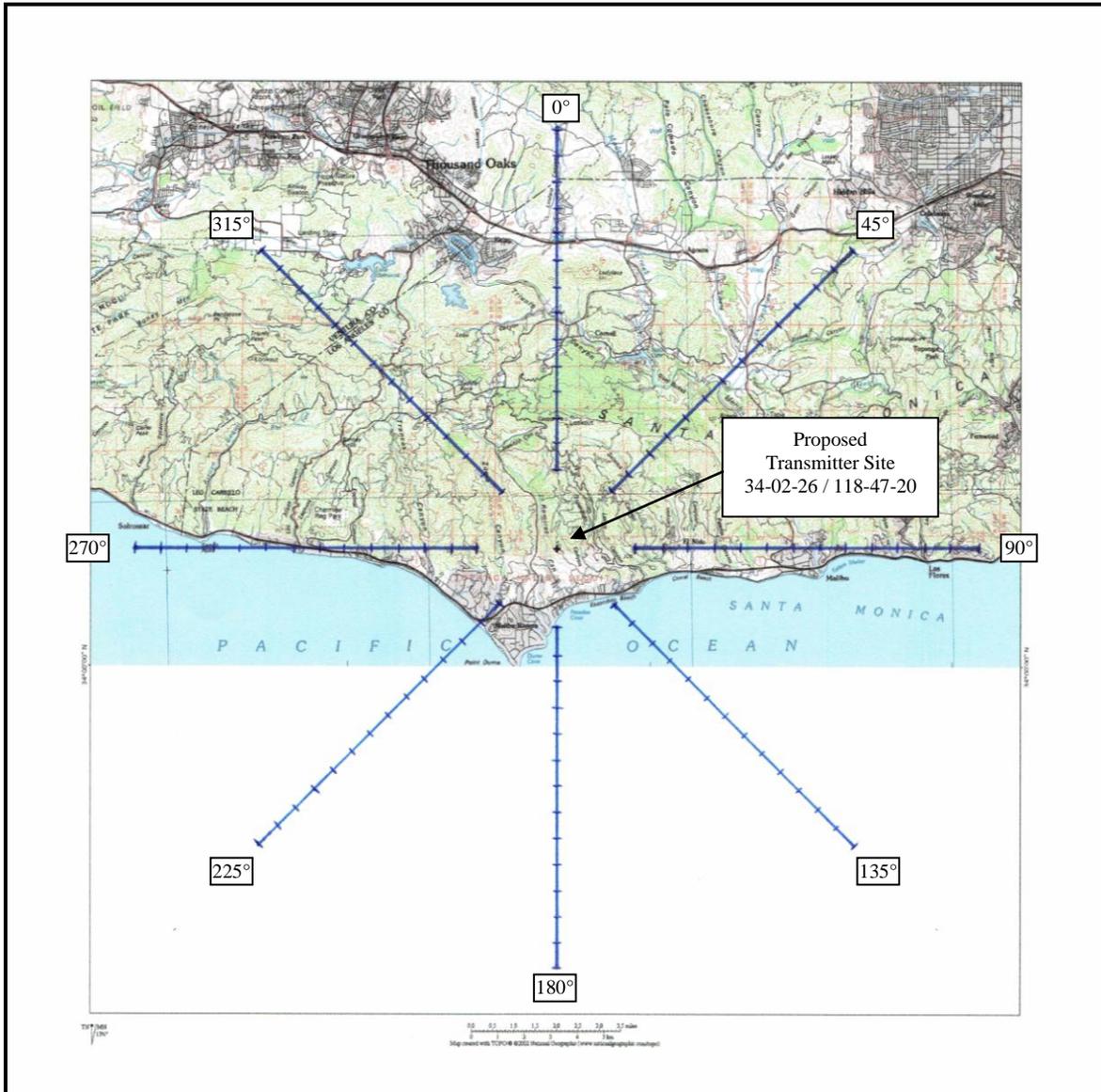
TABLE 1

Applicant: Zuma Beach FM Emergency and Community Broadcasters, Inc. - KBUU-LP, Malibu, CA
 Channel: 248L1 (97.5 MHz)
 Coordinates: 34-02-26 / 118-47-20 (NAD27)
 Search Radius: 150 km
 FCC Database: 5/22/2014

| Callsign City of License | Auth | Licensee State FCC File No. | Chan Freq | HAAT HAMSL | ERP (kW) | Latitude Longitude | Bear (deg) | Dist (km) | Req (km) |
|-----------------------------|------|---|---------------|---------------|--------------------|-----------------------|---------------|--------------|--------------|
| NEW SANTA BARBARA | APP | SOUTH COAST COMMUNITY MEDIA ACCESS CA BNPL-20131113BOA | 245L1 96.9 | -148 25 | 0.1 H 0 V | 34-25-50 119-40-90 | 298.1 | 91.4 | 0 CLEAR |
| NEW SANTA BARBARA | APP | CALVARY CHAPEL OF SANTA BARBARA CA BNPL-20131113AIR | 245L1 96.9 | -125 21 | 0.1 H 0 V | 34-25-00 119-40-00 | 297.3 | 92.4 | 0 CLEAR |
| KAMP-FM LOS ANGELES | LIC | CBS RADIO EAST INC. CA BMLH-19900206KB | 246B 97.1 | 915 1809 | 21 H 21 V | 34-13-00 118-03-00 | 72.5 | 69.8 | 67 CLOSE |
| KAMP-FM LOS ANGELES | LIC | CBS RADIO EAST INC. CA BXLH-20100806AAO | 246B 97.1 | 405 851 | 7 H 7 V | 34-11-12 118-15-58 | 70.3 | 51.9 | 67 SHORT |
| KRJK LAMONT | LIC | BUCK OWENS PRODUCTION COMPANY, INC CA BLH-20111004AAT | 247A 97.3 | 171 838 | 2 H 2 V | 35-11-00 118-43-00 | 2.8 | 128.0 | 56 CLEAR |
| K247BU LANCASTER | CP | MARY V. GUTHRIE CA BNPFT-20130822AFZ | 247D 97.3 | -17 770 | 0.055 H 0.055 V | 34-39-00 118-07-00 | 41.1 | 91.6 | 13 CLEAR |
| KLYY RIVERSIDE | LIC | ENTRAVISION HOLDINGS, LLC CA BXLH-20020225AAS | 248B 97.5 | 485 928 | 3 H 3 V | 33-57-00 117-17-00 | 93.0 | 138.8 | 112 CLEAR |
| KYGA GOLETA | LIC | EDUCATIONAL MEDIA FOUNDATION CA BLEED-20130307ABR | 248B 97.5 | 890 1252 | 17.5 H 17.5 V | 34-31-00 119-57-00 | 297.0 | 120.3 | 112 CLEAR |
| KBUU-LP MALIBU | CP | ZUMA BEACH FM EMERGENCY AND COMMUN CA BNPL-20131113BMD | 248L1 97.5 | 9 175 | 0.05 H 0 V | 34-02-04 118-48-33 | 238.6 | 1.4 | 24 SHORT |
| NEW SAN PEDRO | APP | SAN PEDRO HISPANIC COMMUNITY RADIO CA BNPL-20131112ALV | 248L1 97.5 | 414 465 | 0.0011 H 0 V | 33-44-00 118-20-00 | 127.9 | 52.9 | 24 CLEAR |
| NEW CANOGA PARK | APP | CANOGA PARK HISPANIC COMMUNITY CA BNPL-20131112ADP | 248L1 97.5 | 299 672 | 0.0014 H 0 V | 34-14-00 118-40-00 | 25.2 | 25.0 | 24 CLOSE |
| NEW LOS ANGELES | APP | COMUNIDAD HISPANA DE LOS ANGELES CA BNPL-20131112BHF | 248L1 97.5 | 288 481 | 0.0015 H 0 V | 34-07-00 118-22-00 | 76.1 | 40.0 | 24 CLEAR |
| NEW CASTAIC | APP | SLOAN CANYON COMMUNICATIONS CA BMPL-20140430AAA | 248L1 97.5 | 0 0 | 0 H 0 V | 34-34-10 118-44-20 | 4.3 | 58.7 | 24 CLEAR |
| KTPI-FM MOJAVE | LIC | RZ RADIO LLC CA BLH-19880201KG | 249A 97.7 | 91 945 | 3 H 3 V | 34-58-00 118-10-00 | 28.4 | 118.7 | 56 CLEAR |
| KLAX-FM EAST LOS ANGELES | LIC | KLAX LICENSING, INC. CA BLH-19971231KC | 250B 97.9 | 184 596 | 33 H 33 V | 34-09-00 118-11-00 | 75.8 | 56.4 | 67 SHORT |
| KLAX-FM EAST LOS ANGELES | LIC | KLAX LICENSING, INC. CA BXMLH-20011015AAD | 250B 97.9 | 119 189 | 14 H 14 V | 34-00-00 118-21-00 | 95.3 | 39.3 | 67 SHORT |
| KCPK-LP PINE MOUNTAIN CL | CP | CENTER OF THE WORLD FESTIVAL, INC. CA BNPL-20131021ACM | 250L1 97.9 | 98 1678 | 0.009 H 0 V | 34-50-30 119-09-30 | 339.1 | 96.2 | 0 CLEAR |
| KCPK-LP PINE MOUNTAIN CL | APP | CENTER OF THE WORLD FESTIVAL, INC. CA BMPL-20140505AAN | 250L1 97.9 | 0 0 | 0 H 0 V | 34-51-20 119-09-10 | 339.2 | 96.2 | 0 CLEAR |
| K251AH GRAND TERRACE | LIC | THE ASSOCIATION FOR COMMUNITY EDUC CA BLFT-19970929TH | 251D 98.1 | 0 0 | 0 H 0.008 V | 34-01-00 117-17-00 | 90.4 | 137.9 | 6 CLEAR |

TABLE 1 (con't)

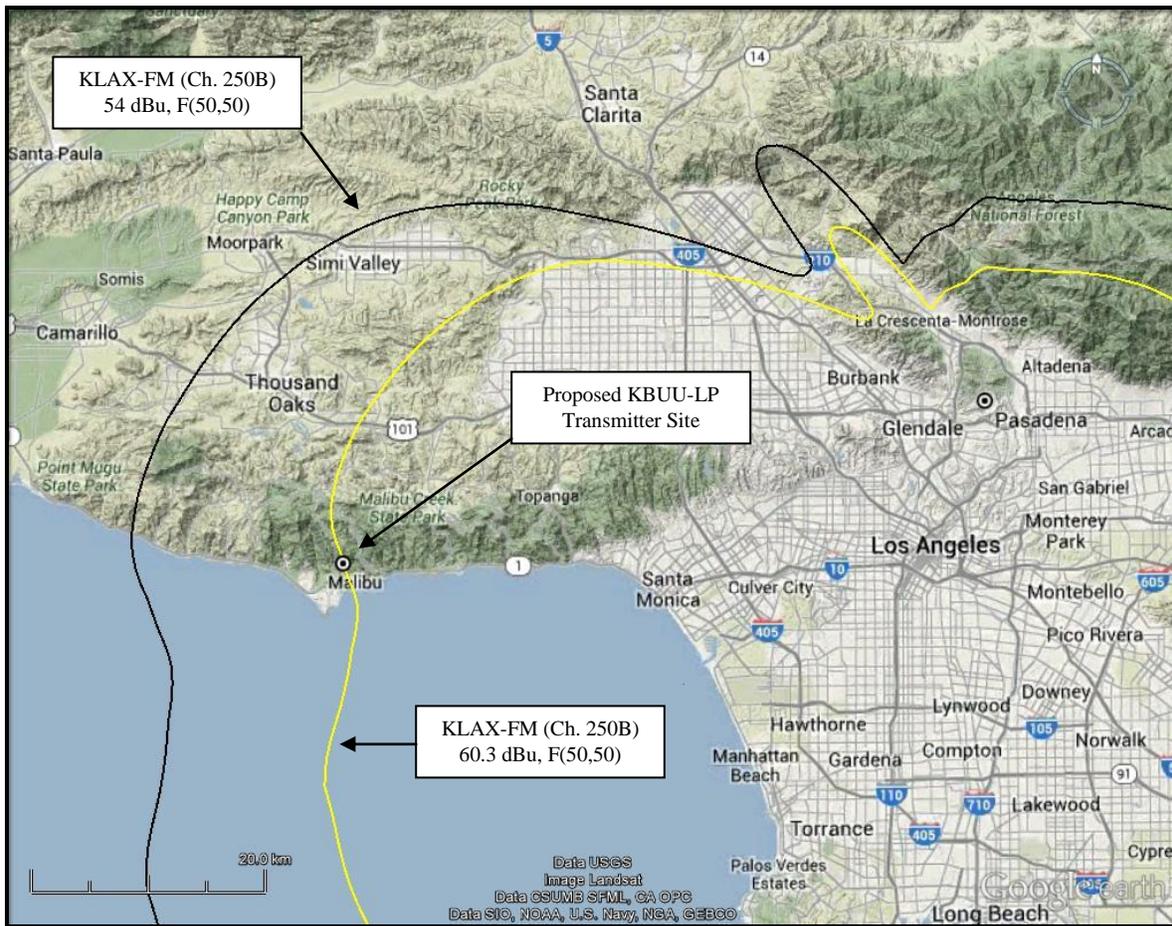
| Callsign | Auth | Licensee | Chan | HAAT | ERP | Latitude | Bear | Dist | Req |
|-----------------|------|------------------------------------|-------|-------|----------|-----------|-------|-------|-------|
| City of License | | State FCC File No. | Freq | HAMSL | (kW) | Longitude | (deg) | (km) | (km) |
| K251BK | CP | GOLD COAST BROADCASTING LLC | 251D | 722 | 0 H | 34-41-00 | 15.3 | 74.0 | 6 |
| THREE POINTS | | CA BNPFT-20130829AGT | 98.1 | 0 | 0.0075 V | 118-34-00 | | | CLEAR |
| KCGV-LP | CP | CALIFORNIA FAMILY COUNSELING NETWO | 251L1 | 0 | 0.1 H | 35-02-60 | 352.1 | 111.3 | 0 |
| LEBEC | | CA BNPL-20131028AAX | 98.1 | 257 | 0 V | 118-57-60 | | | CLEAR |



3 - 16 km Radials Map

KBUU-LP, Malibu, CA
Channel 248 (97.5 MHz)
0.035 kW – ND, 50 m HAAT

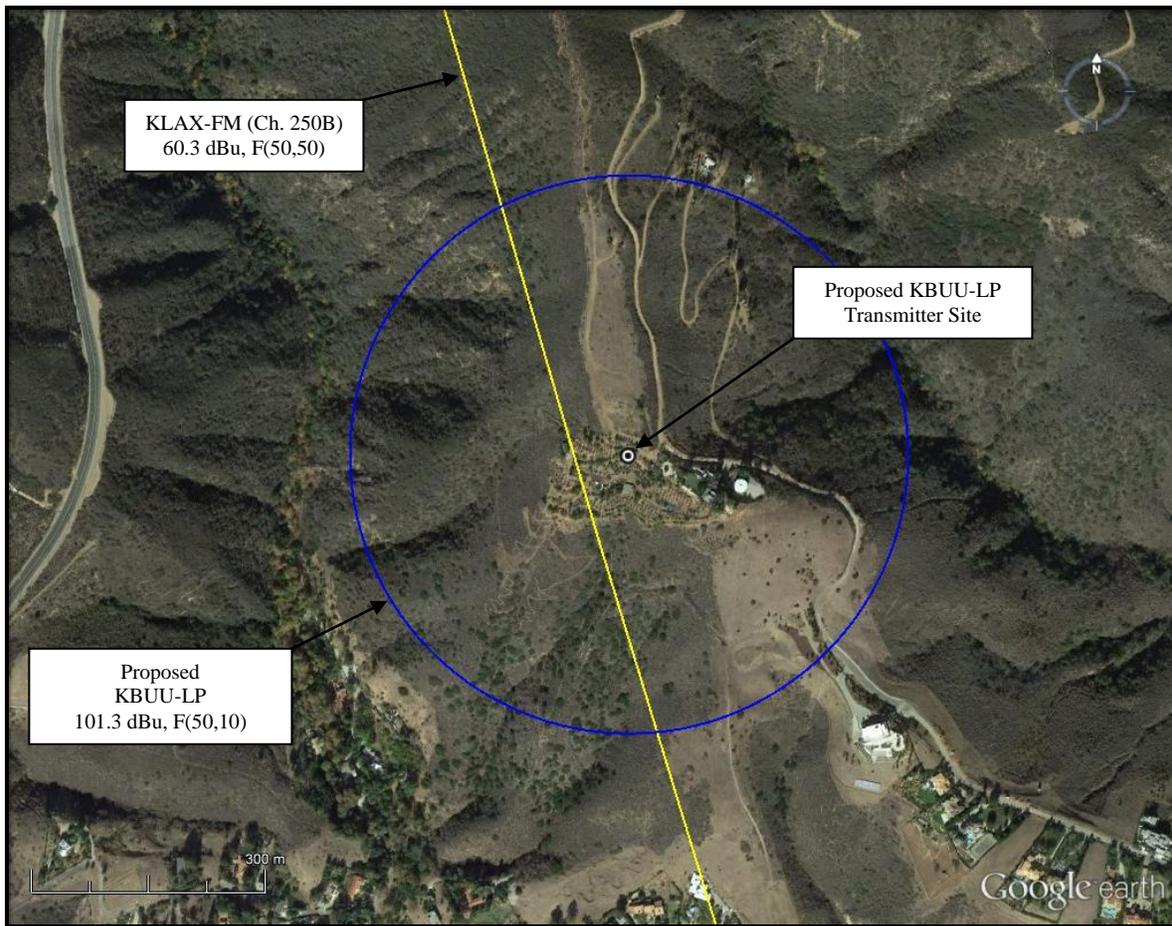
Figure 2



2nd Adjacent Contour Overlap Map

KBUU-LP, Malibu, CA
Channel 248 (97.5 MHz)
0.035 kW – ND, 50 m HAAT

Figure 3



2nd Adjacent Contour Overlap - Aerial Photograph

**KBUU-LP, Malibu, CA
Channel 248 (97.5 MHz)
0.035 kW – ND, 50 m HAAT**

Figure 4