

Translator K269AR
Seeks Channel 284D – 104.7 MHz
Flagstaff, Arizona
December 2008

Waiver Request

FM Translator K269AR at Flagstaff, AZ is currently operating on Channel 269D utilizing a directional antenna with an effective radiated power of 0.044 kW. On May 24, 2006 a construction permit was issued to KQLP (FM), a new full-service broadcast station on Channel 268C1 (File No. BMPH-20080110ACB) that will displace Translator K269AR. The KQLP (FM) transmitter site is located only 60.49 km away from Translator K269AR. The Translator K269AR site is inside the 60 dBu contour of KQLP (FM). Once this KQLP (FM) facility is constructed and licensed, Translator K269AR will be forced to either locate on another frequency or cease broadcasting.

A frequency search was conducted to locate a new channel for K269AR. This search was limited to first, second and third-adjacent channels and intermediate frequency (I.F.) channels. All of the adjacent channels are precluded by existing stations or authorizations. The I.F. channels related to Channel 269 are in the reserved band. The preclusions are shown in the table below.

<u>Channel</u>	<u>Preclusion</u>
266	KNRJ (License) – 266C1 – BLH-19981230KA
267	KQLP (CP) – 268C1 – BMPH-20080110ACB
268	KQLP (CP) – 268C1 – BMPH-20080110ACB
270	KAHM (License) – 271C – BLH-19960111BK
271	KAHM (License) – 271C – BLH-19960111BK
272	KAHM (License) – 271C – BLH-19960111BK

Since no adjacent channels are available, the frequency search was broadened to include the rest of the non-reserved band. This frequency search found that Channel

284D is the best suitable option for this translator. Because this proposed channel change is outside the three adjacencies and I.F. channels, this would be considered a major change. However, since Translator K269AR is being displaced by KQLP (FM), the applicant is requesting a waiver of §74.1233 of the FCC's Rules. It is requested that this channel change be considered a minor change.

Grant of the requested waiver will serve the public interest by permitting the translator to rebroadcast the signal of KVNA-AM, a station that has provided a unique off-air signal to the Flagstaff area for over 24 years. Due to the loss of its licensed transmitter site, KVNA-AM has been operating with temporary, limited facilities for some time until a new permanent transmitter site can be found. KVNA-AM was authorized to rebroadcast its signal on K269AR in order to enhance the station's coverage.

However, as noted above that option will no longer be available in the near future.

Based on our technical consultant's search, it appears that the only other channel that can be used to rebroadcast KVNA-AM is 284, subject to the grant of a waiver of Rule 74.1233 to accept and process this application.

KVNA-AM (originally KCLS) is one of the original radio frequencies in Flagstaff. It is the sole News/Talk/Sports station serving Northern Arizona. KVNA-AM is uniquely situated at the crossroad of two major US Interstate Highways, I-40 and I-17, and is a vital information source in its community for everything from road/traffic conditions to weather related emergencies and local news. The local television station no longer carries local news and the local newspaper is rumored to be going out of business, which will leave KVNA-AM as the community's main source of local news.

KVNA-AM works with the law enforcement agencies and governmental and emergency services to provide timely and accurate information, such as emergency broadcasts related to recent devastating forest fires and the crash of two medical helicopters. KVNA-AM focuses on its community's needs by providing support to area food banks, homeless shelters, animal shelters, blood banks, etc.; by coverage of high school sporting events, as well as professional ones; by broadcasting locally originated weekly programs on finance, current affairs, computers, etc.; and by broadcasting feature programs such as Dennis Miller, Bill O'Reilly, Dr. Laura, Clark Howard, Ed Schultz, and Coast to Coast. Additionally, KVNA-AM reaches out to the minority population in its community through a weekly six-hour program co-hosted by a member of the county supervisors.