

1. Purpose of Application

This Engineering Report is part of an application for facilities changes for FM station KUBB at Mariposa, CA by Buckley Broadcasting Corp. of Monterey Inc. The proposed station will operate on FM channel 242B (96.3 MHz) with an effective radiated power of 1.9 kilowatts (2.79 dBk) at an antenna height above average terrain of 639 meters. The ERP specified is the maximum for Class B facilities at this antenna height, as calculated in accordance with the Commission's Rules.

2. Allocation Considerations

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class B stations as prescribed in §73.207 of the Commission's Rules, with the exception of KNTD 240A Livingston, CA. As this short spacing was created by the spacing requirements adopted in Docket 80-90, and has existed continuously since that time, §73.213(c) applies. The proposed site is less than 500 meters from the licensed site. When calculated per §73.208(c) the distance to KNTD from both the licensed and proposed KUBB sites is 66 km. As such, this application maintains the existing separation. See attached e-mail from FCC staff.

----- Original Message -----

From: "Dale Bickel" <DBICKEL@fcc.gov>
To: <dawson@hatdaw.com>
Sent: Monday, February 26, 2001 4:50 AM
Subject: Re: A shortspacing question

Some years back we had a similar case with a station in Ohio (Hamilton, Ohio, if I remember rightly) which was grandfathered under 73.213(c) as is the case here. After a lot of discussion back and forth, we decided that the rounding rule did indeed apply, and that since both the new and old spacings rounded to the same value in km, the application was granted.

So you don't need to show overlap areas, which will simplify the application greatly.

If you want to, you can include a note in the application (or a copy of this e-mail) that you discussed the matter with me. That way, if any question arises (since this doesn't come up very often), the processing staff member will ask me about it.

Dale Bickel dbickel@fcc.gov
Senior Electronics Engineer
Audio Services Division, FCC

"Benjamin F. Dawson III" <ben-dawson@hatdaw.com 02/23/01 02:03PM>
Dale

I have a short-spacing question which my research in our library hasn't resolved. You are one of the Commissions' best sources of "institutional memory" so I thought I would ask you for some assistance.

An existing class B and Class A station are 2nd adjacent and are spaced just over 66 km. The B is from 1977 or so, and the A was licensed in '84 as the result of an application in early 1983 or before, so the spacing standard for this situation at the time of the initial licensing and CP for the A was 65 km. We now need to change the class B from one tower to a different one on the same mountaintop, and the new spacing would be just under 66 km, a difference of perhaps 350 meters.

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Because this isn't a case covered by 73.213 and its precedent rules, I have a note that I asked Bob Greenburg about this kind of situation back in June of '88 and he told me it would be a "first impression" question at that time.

But the spacings both round to 66 km per 73.208(c)(8). I remember some controversy a few years ago whether the spacing calculation round-off rule applied to short-spacing cases, but I don't remember the resolution, if any.

So, my questions are (1) do I just show that they both round to 66 km and that's enough, or (2) do I have to show that the areas of overlap and/or interference don't increase or at least trade off to no net gain, or (3) do I have to use 73.215?

73.213 doesn't cover this situation, even though it probably should, since the stations are not both pre-Docket 14185.

Any light you can shed will be most appreciated.

ben

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FM Database Date: 010510

Channel: 242B 96.3 MHz Page 1
Latitude: 37 32 0
Longitude: 120 1 29
Safety Zone: 100 km
Job Title: **KUBB Licensed**

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KJFX LIC	FRESNO CA	BLH-880616KB	239B 95.7	17.500 259.0	36-56-55 119-29-09	143.6	80.61 6.61	74 CLOSE
KZQZ-FM LIC	LIVERMORE, CA	ETC. BLFTB-960913TE	239D 95.7	0.090 DA 495.0	37-37-12 121-55-16	273.9	167.80 0.00	0 BOOST
NEW APP	STOCKTON CA	BNPL-000605AAC	239L1 95.7	0.020 60.9	37-59-47 121-12-46	296.6	116.62 49.62	67 CLEAR
NEW APP	STOCKTON CA	BNPL-000605AJL	239L1 95.7	0.100 30.3	37-59-33 121-12-54	296.4	116.61 49.61	67 CLEAR
KBYN LIC	ARNOLD CA	BLH-951010KF	240A 95.9	0.500 334.0	38-18-07 120-19-08	343.3	89.15 20.15	69 CLEAR
KBYN CP	ARNOLD CA	BPH-981005IB	240A 95.9	0.980 246.0	38-22-42 120-11-36	351.1	94.95 25.95	69 CLEAR
ADD	DOS PALOS CA	RM-9857	240A 95.9	0.000 0.0	37-04-03 120-44-52	231.2	82.36 13.36	69 CLEAR
KNT0 APP	LIVINGSTON CA	BPH-010214ACG	240A 95.9	3.300 DA 135.0	36-55-35 120-43-42	222.9	91.85 22.85	69 CLEAR
KNT0 LIC	LIVINGSTON CA	BLH-841113KK	240A 95.9	3.000 93.0	37-18-57 120-43-20	248.8	66.29 -2.71	69 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 63 KM								
NEW APP	MANTECA CA	BNPL-000608AFB	240L1 95.9	0.100 13.7	37-48-28 121-11-49	286.8	107.81 40.81	67 CLEAR
K240AH LIC	SALINAS, ETC. CA	BLFT-870302TF	240D 95.9	0.010 DA -46.0	36-45-40 121-30-00	237.2	156.60 0.00	0 TRANS
K240CE LIC	YOSEMITE VILLAGE, ET CA	BLFT-910515TB	240D 95.9	0.020 DA 887.0	37-43-45 119-34-20	61.2	45.47 0.00	0 TRANS
NEW-T APP	CARMEL HIGHLANDS CA	BPFT-950720TA	241D 96.1	0.250 DA 561.0	36-29-38 121-54-15	235.9	203.19 0.00	0 TRANS
KSQQ LIC	MORGAN HILL CA	BLH-940801KD	241A 96.1	4.700 49.0	37-11-01 121-48-09	256.6	162.21 49.21	113 CLEAR

FM Database Date: 010510

Channel: 242B 96.3 MHz Page 2
Latitude: 37 32 0
Longitude: 120 1 29
Safety Zone: 100 km
Job Title: **KUBB Licensed**

Call	City	Channel	ERP(kW)	Latitude	Bearing	Dist	Req
Status	St FCC File No.	Freq.	HAAT(m)	Longitude	deg-True	(km)	(km)
KYMAux CP	SACRAMENTO CA BPH-99041AIJ	241B 96.1	50.000 115.0	38-38-13 121-33-08	313.0	181.56 0.00	0 AUX
KYMLIC	SACRAMENTO CA BLH-850313KK	241B 96.1	50.000 145.0	38-38-09 121-33-11	313.0	181.53 12.53	169 CLEAR
KSLY-FM LIC	SAN LUIS OBISPO CA BLH-971104KE	241B 96.1	3.400 514.0	35-21-37 120-39-17	193.3	247.66 78.66	169 CLEAR
KSLY-FM CP	SAN LUIS OBISPO CA BPH-001003ACE	241B 96.1	3.400 514.0	35-21-37 120-39-18	193.3	247.66 78.66	169 CLEAR
KSLK LIC	VISALIA CA BLH-941115KA	241A 96.1	4.800 110.0	36-21-59 119-10-45	149.7 SS	149.81 36.81	113 CLEAR
KUBBLIC	MARIPOSA CA BLH-870202KH	242B 96.3	1.900 644.0	37-32-00 120-01-29	0.0	0.00 -241.00	241 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 211 KM							
NEW APP	SALINAS CA BNPL-000602AHO	242L1 96.3	0.000 0.0	36-41-18 121-33-18	235.8	165.21 53.21	112 CLEAR
K240AH APP	SALINAS, ETC. CA BPFT-001020AAH	242D 96.3	0.010 890.0	36-45-22 121-30-05	237.0	157.01 0.00	0 TRANS
KKXX-FM LIC	BAKERSFIELD CA BLH-7231	243B 96.5	50.000 152.0	35-29-08 118-53-19	155.6	248.98 79.98	169 CLEAR
K243AK LIC	MAMMOTH LAKES CA BLFT-981221TG	243D 96.5	0.010 DA 651.0	37-42-45 118-39-27	80.2	122.33 0.00	0 TRANS
KOIT-FM LIC	MARTINEZ, ETC. CA BLFT-920824TD	243D 96.5	3.300 DA 305.0	37-55-57 122-07-21	284.2	190.16 0.00	0 BOOST
KOIT-FM LIC	SAN FRANCISCO CA BLH-980304KK	243B 96.5	24.000 480.0	37-45-20 122-27-05	277.3	215.59 46.59	169 CLEAR
KLCA LIC	TAHOE CITY CA BLH-980116KC	243C1 96.5	6.100 903.0	39-18-38 119-53-01	3.5 SS	197.66 2.66	195 CLOSE
KEZLIC	FOWLER CA BLH-920210KA	244B1 96.7	25.000 DA 100.0	36-41-39 119-43-57	164.4	96.68 25.68	71 CLEAR

44444 END OF FM SPACING STUDY FOR CHANNEL 242 44444

FM Database Date: 010510

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Longitude: 120 1 46

Job Title: **KUBB @**

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KYMAux CP	SACRAMENTO CA	BPH-990414IJ	241B 96.1	50.000 115.0	38-38-13 121-33-08	313.1	181.23 0.00	0 AUX
KYMLIC	SACRAMENTO CA	BLH-850313KK	241B 96.1	50.000 145.0	38-38-09 121-33-11	313.1	181.21 12.21	169 CLEAR
KSLY-FM LIC	SAN LUIS OBISPO CA	BLH-971104KE	241B 96.1	3.400 514.0	35-21-37 120-39-17	193.2	247.59 78.59	169 CLEAR
KSLY-FM CP	SAN LUIS OBISPO CA	BPH-001003ACE	241B 96.1	3.400 514.0	35-21-37 120-39-18	193.2	247.60 78.60	169 CLEAR
KSLK LIC	VISALIA CA	BLH-941115KA	241A 96.1	4.800 110.0	36-21-59 119-10-45	149.5 SS	150.05 37.05	113 CLEAR
KUBB LIC	MARIPOSA CA	BLH-870202KH	242B 96.3	1.900 644.0	37-32-00 120-01-29	94.2	0.42 -240.58	241 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 211 KM								
NEW APP	SALINAS CA	BNPL-000602AHO	242L1 96.3	0.000 0.0	36-41-18 121-33-18	235.7	164.88 52.88	112 CLEAR
K240AH APP	SALINAS, ETC. CA	BPFT-001020AAH	242D 96.3	0.010 890.0	36-45-22 121-30-05	236.9	156.68 0.00	0 TRANS
KKXX-FM LIC	BAKERSFIELD CA	BLH-7231	243B 96.5	50.000 152.0	35-29-08 118-53-19	155.5	249.19 80.19	169 CLEAR
K243AK LIC	MAMMOTH LAKES CA	BLFT-981221TG	243D 96.5	0.010 651.0	DA 37-42-45 118-39-27	80.2	122.73 0.00	0 TRANS
KOIT-FM LIC	MARTINEZ, ETC. CA	BLFT-920824TD	243D 96.5	3.300 305.0	DA 37-55-57 122-07-21	284.2	189.74 0.00	0 BOOST
KOIT-FM LIC	SAN FRANCISCO CA	BLH-980304KK	243B 96.5	24.000 480.0	37-45-20 122-27-05	277.3	215.17 46.17	169 CLEAR
KLCA LIC	TAHOE CITY CA	BLH-980116KC	243C1 96.5	6.100 903.0	39-18-38 119-53-01	3.6 SS	197.66 2.66	195 CLOSE
KEZL LIC	FOWLER CA	BLH-920210KA	244B1 96.7	25.000 100.0	DA 36-41-39 119-43-57	164.2	96.83 25.83	71 CLEAR

FM Database Date: 010510

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Longitude: 120 1 46

Safety Zone: 100 km

Job Title: **KUBB @**

44444 END OF FM SPACING STUDY FOR CHANNEL 242 44444