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Engineering Report: Site Selection Report

Prepared for:
Radio Station
KRPI, 1550 kHz
Ferndale, Washington

BBC Broadcasting, Inc

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Introduction

Hatfield & Dawson was retained by BBC Broadcasting (“BBC”) in April 2006 to assist in the license renewal process of AM station KRPI, which operates on 1550 kHz at Ferndale, WA. Organized opposition from a group of community residents in Ferndale (supported by letters of opposition from elected officials in local, state, and federal government) led to a contentious and voluminous license renewal process that left the community of Ferndale as a “poisoned well.” While the FCC ultimately approved KRPI’s license renewal application, BBC immediately retained Hatfield & Dawson to assist in finding a new site for the KRPI transmitter that would relieve Ferndale residents of the problems that the current location had caused in an effort to repair ties with a community that no longer wants a transmitter site and is unwilling to support the station.

Site Selection Criteria

The non-negotiable criteria utilized in the search for a new site were:

- \$ Protection of the Ferndale FCC Monitoring Station facility - Any move that KRPI makes may not increase the station’s field strength at this facility.
- \$ Area of lower population density for the area within the 1 V/m contour - Many of the problems with license renewal at the existing site arose from the increased development in the area.
- \$ The new site has to be acceptable to permitting by the county, the FCC, and satisfy environmental considerations - This means avoiding wetland areas, areas of cultural significance, wildlife areas, airport areas, industrial areas (refineries and aluminum smelter), parks, and areas near other AM radio stations.
- \$ The new site should avoid location close to the BC Hydro/BPA 500 kV Intertie transmission line.
- \$ Sufficient land area for the construction of five towers and the ground system.

If any one of these criteria were not met the site was rejected. Attached is a map labeled “KRPI Site Restrictions” with four detail maps of potential site areas. BBC, through its agent, Dale Badh, has spent more than three years searching for available parcels on which to relocate the KRPI transmission site. Based on information provided by BBC and Mr. Badh, the blue boxes on the attached map identify every parcel available for sale or lease, 10 acres or larger, in the correct

orientation, in mainland Whatcom County from 2008 to present. Every single parcel is located in an exclusion area.

Site Limitations

The FCC has maintained a Monitoring Station near Ferndale in northwest Washington since at least the 1940s. This station is used to monitor distress calls in the north Pacific, to help the FCC with enforcement action, and is also used by other government agencies to monitor high frequency radio communication around the world. This facility is a very important part of the monitoring station network as it provides a long baseline for triangulation of signals in not only the north Pacific but across the globe. The radio equipment used at this site is very sensitive and uses very low noise amplifiers to detect extremely small signals. Strong AM radio station signals can cause overload conditions or intermodulation products in these devices, which can destroy the ability to detect small signals throughout the band. The Ferndale Monitoring Station is a very important asset for safety of life, national defense, and spectrum enforcement and KRPI is required by FCC rules to protect the station. The proximity of the Ferndale Monitoring Station has completely eliminated KRPI's ability to move to any location north of Ferndale. Any facilities changes that KRPI proposes may not increase the field strength at the Ferndale Monitoring Station. The monitoring station exclusion area shown on the attached map is based on a 50 kW non-directional signal and also on a reasonably achievable directional antenna system. To move closer to the monitoring station will excessively complicate the directional antenna system, increase the land area needed to implement such a directional antenna system, and reduce the population served by the new facility.

In point of fact, the proposed facility will reduce the KRPI field strength at the Ferndale Monitoring Station and will thereby improve the ability of the monitoring station to receive very low signals.

KRPI's Nighttime Interference Free (NIF) contour value is extremely high, 38 mV/m. Providing nighttime coverage of the city of license – given all of the site restrictions in this area – has proven to be a significant challenge (See Request for Waiver in KRPI Form 301 application).

The BC Hydro/BPA 500 kV Intertie transmission line is a major power distribution line which includes at least six three-phase lines, for a total of 18 phases. Location of KRPI near the Intertie should be avoided due to potential reradiation and attenuation effects which would be caused by the lines. Hatfield & Dawson has had extensive experience in providing counsel to both radio stations and power companies in efforts to mitigate the effects of power distribution lines upon AM antenna systems. The problems caused are not insignificant, and in many cases successful mitigation has proven elusive. For this reason we have excluded from consideration those areas which are within 1.6 km (8 wavelengths at 1550 kHz) of the Intertie.

Potential Sites Areas

There were two areas capable of delivering a daytime and nighttime signal to the community of Ferndale. These search areas were Marrietta and Van Wyck. For reasons discussed below, extensive and failed searches in these search areas led to no available options for a transmitter move in these areas, forcing KRPI to seek a waiver of the nighttime coverage rule. Since nighttime coverage of Ferndale is unattainable from a new location, we identified and evaluated three additional search areas. These areas are: Birch Point, the area east of Van Wyck, and Point Roberts.

Search areas offering daytime and nighttime coverage of Ferndale:

The available search area allowing for both daytime and nighttime coverage of Ferndale is extremely limited based on the distribution of infrastructure in Whatcom County, as shown in the map titled "KRPI Site Restrictions." As the map demonstrates, we identified protection areas around significant infrastructure, where appropriate, eliminating those areas from further consideration. Protection areas for the refineries, smelter, and existing radio transmitter sites were based on the necessity for protecting those facilities from certain levels of radio frequency energy. A protection area for the airport were based on Federal Aviation Administration rules related to airspace penetration for airports utilizing precision instrument approaches and containing runways longer than 6,000 feet. A protection area around the BC Hydro/BPA Intertie was calculated to eliminate unwanted interaction between the directional antenna and the high-voltage transmission system, as indicated above. The Lummi Indian Reservation was also removed from the search area because the Lummi Tribe is a sovereign nation with federal recognition granted by the Treaty

of Point Elliott, signed in 1855. After eliminating land area due to restrictions identified above, we were only able to identify two search areas that could provide both daytime and nighttime coverage of Ferndale.

Marietta (Detail Map #1) – This area is very small, is located in a floodplain, and is also immediately adjacent to the Lummi Indian Reservation. There are approximately 12 parcels of land in the Marietta section. Of those, only two parcels are in the proper orientation and size for the KRPI array. Neither of those two parcels has been for sale or lease from 2008 to present according to BBC and Mr. Badh. Further, use of this site would likely trigger additional tribal consultation for cultural and archaeological resource discussions given its proximity to the Lummi Reservation. Given the lack of available parcels and the potential complications of constructing KRPI's transmission facilities there, we determined that Marietta is not a suitable site.

Van Wyck (Detail Map #2) – The Van Wyck search area contains approximately 474 parcels of land zoned R(5), meaning the majority of the parcels are five acres in size or larger, but most of which are still too small to accommodate KRPI's directional antenna. The area is largely rural residential. Approximately nine parcels are of the correct size and orientation to accommodate the KRPI array, but the majority of these parcels are in the northeast corner of the search area, and are owned by or are proximate to the Shuksan Golf Club. Three parcels are inaccessible. Of the remaining six parcels, none have been available for sale or lease from 2008 to present according to BBC and Mr. Badh. Accordingly, Van Wyck is also not a suitable site.

With fewer than 50 parcels in the proper orientation and size to construct a directional antenna for KRPI divided among three search areas, the task of locating in an area capable of providing daytime and nighttime coverage of Ferndale is exceptionally complicated. In light of this difficulty, we identified additional search areas that would provide daytime coverage only.

Alternate Search Areas (Providing Only Daytime Coverage of Ferndale)

While BBC and Mr. Badh continued to search for parcels affording both daytime and nighttime

coverage of Ferndale, BBC also broadened its search to incorporate additional search areas within Whatcom County. Since the area south of Bellingham is principally comprised of mountainous, rocky terrain, this left three remaining search areas. All three areas are only capable of providing a daytime signal to Ferndale, and thus require a waiver of the Commission's nighttime rules. With respect to coverage, Point Roberts and the area east of Van Wyck are roughly equivalent given the seawater path back to Ferndale from Point Roberts. While the sites would provide comparable service from an engineering perspective, based on the information available to us about land availability, Point Roberts appears to be the superior, and only, option.

Birch Point (Detail Map #3) – Potential sites on Birch Point are located three miles or less from the seven tower array for AM stations KARI 550 kHz Blaine and KVRI 1600 kHz Blaine. Given that KRPI and KVRI are only separated by 50 kHz and both are licensed to operate at 50kW, the interaction of KRPI with KVRI could prove to be an insurmountable problem. Further, the Birch Point area is a desirable location for large vacation homes and has several extensive resort communities in the vicinity. Large areas are used for golf courses, recreation areas, and beaches, limiting the availability of land suitable for KRPI's transmission facilities. Nevertheless, this area contains 14 parcels of the correct size and orientation to accommodate the KRPI antenna. If KRPI attempts to remain at least a half mile from the above-referenced developments, only seven parcels of land remain of the correct size and orientation. Although these parcels exist, based on the information from BBC and Mr. Badh, there have been no parcels over 10 acres in size available for sale or lease in this area from 2008 to present. Given the potentially insurmountable interaction problem with KARI and the lack of available sites or sufficient size, Birch Point is not a suitable site.

Area East of Van Wyck (No detail map included due to the size of this area) – This is an extensive area that includes the communities of Everson, Nooksack, and Sumas. It is bounded on the east by high terrain of the foothills of the Cascade Mountain Range, which is unsuitable for AM station use. None of the parcels in this area would provide NIF coverage of Ferndale. Generally, the parcels in this area would provide comparable coverage from an engineering perspective to the KRPI application site in Point Roberts.

Based on the information from BBC and Mr. Badh, however, there have been no parcels 10 acres or larger in size available for sale or lease in this area from 2008 to present. Accordingly, while the area East of Van Wyck would provide comparable coverage to the KRPI application site, it would not present significant benefits, and the lack of available parcels make it unsuitable.

Point Roberts (Detail Map #4) – Point Roberts is economically depressed and has several suitable parcels available for sale or lease. This is due in part to its physical separation from mainland Whatcom County. This site provides: a location where a local building permit is obtainable, an available parcel of land of sufficient size to construct the array, lower population density directly around the site compared to the existing site in Ferndale, and a significant reduction in field strength at the Ferndale Monitoring Station. Point Roberts is also desirable for its absence of high tension power lines and its abundance of large parcels from which to choose.

Conclusion

Given the numerous constraints on siting KRPI, it is our opinion that the Point Roberts parcel is the only reasonable site for relocation of this facility.

Statement of Engineer

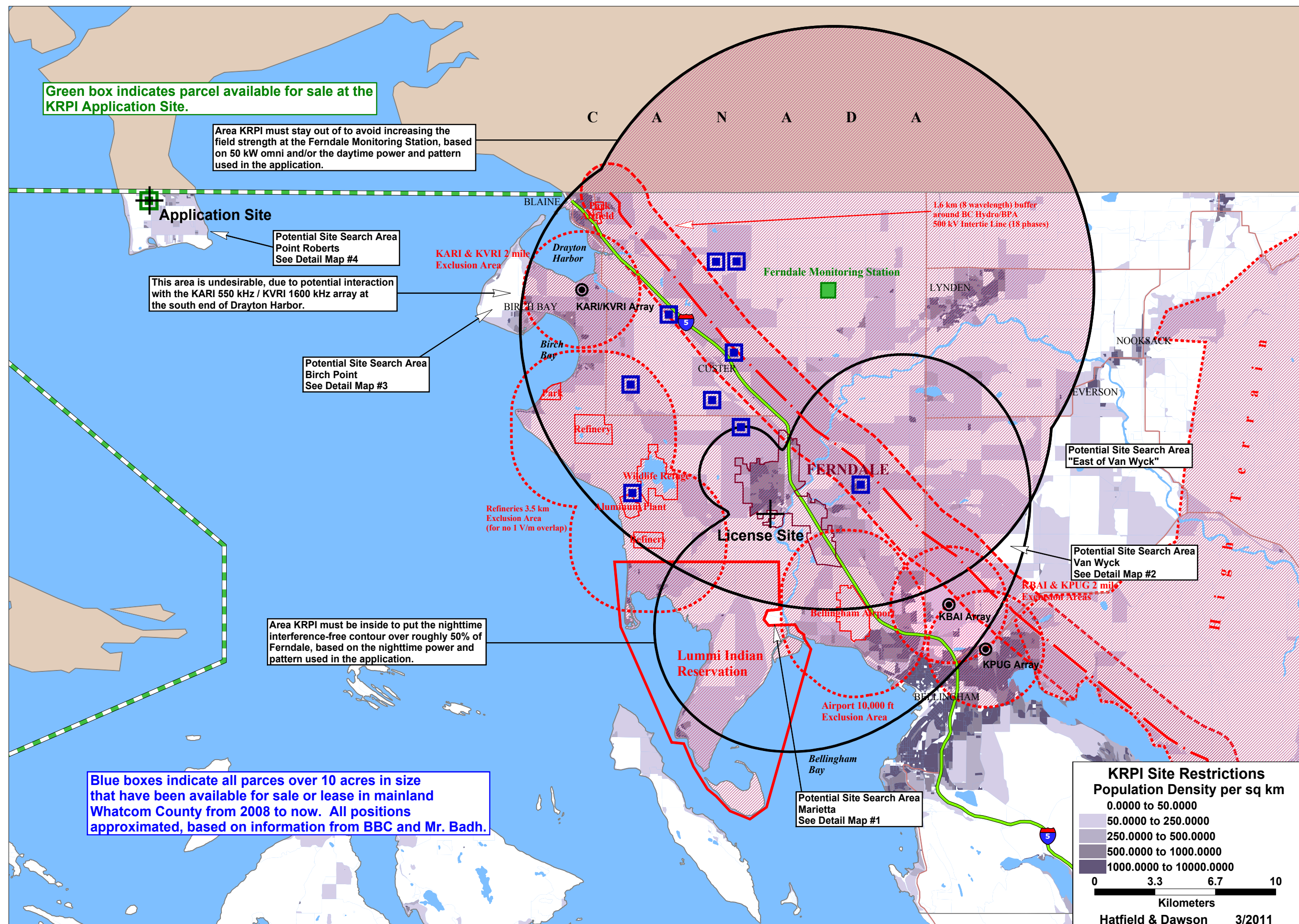
This Engineering Statement, responding to *Site Selection Report for KRPI, 1550 kHz, Ferndale* has been prepared on behalf of BBC Broadcasting. All representations contained herein are true to the best of my knowledge, and I hereby declare that the facts set out in the foregoing Engineering Statement, except those of which official notice may be taken, are true and correct. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington, Alaska and Wyoming and hold an FCC General Radiotelephone Operator License number PG-10-14799, and amateur radio license K7SSL.

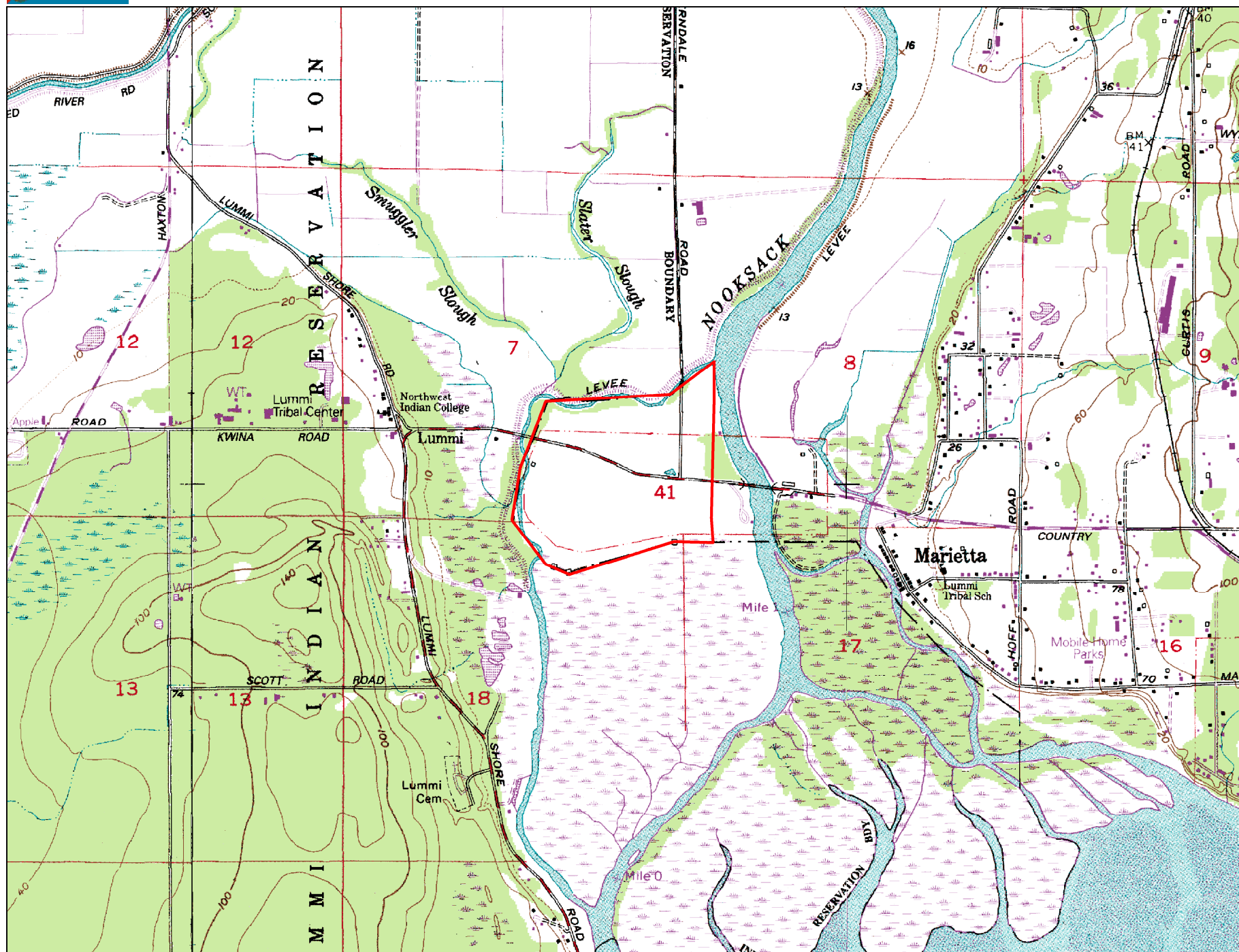
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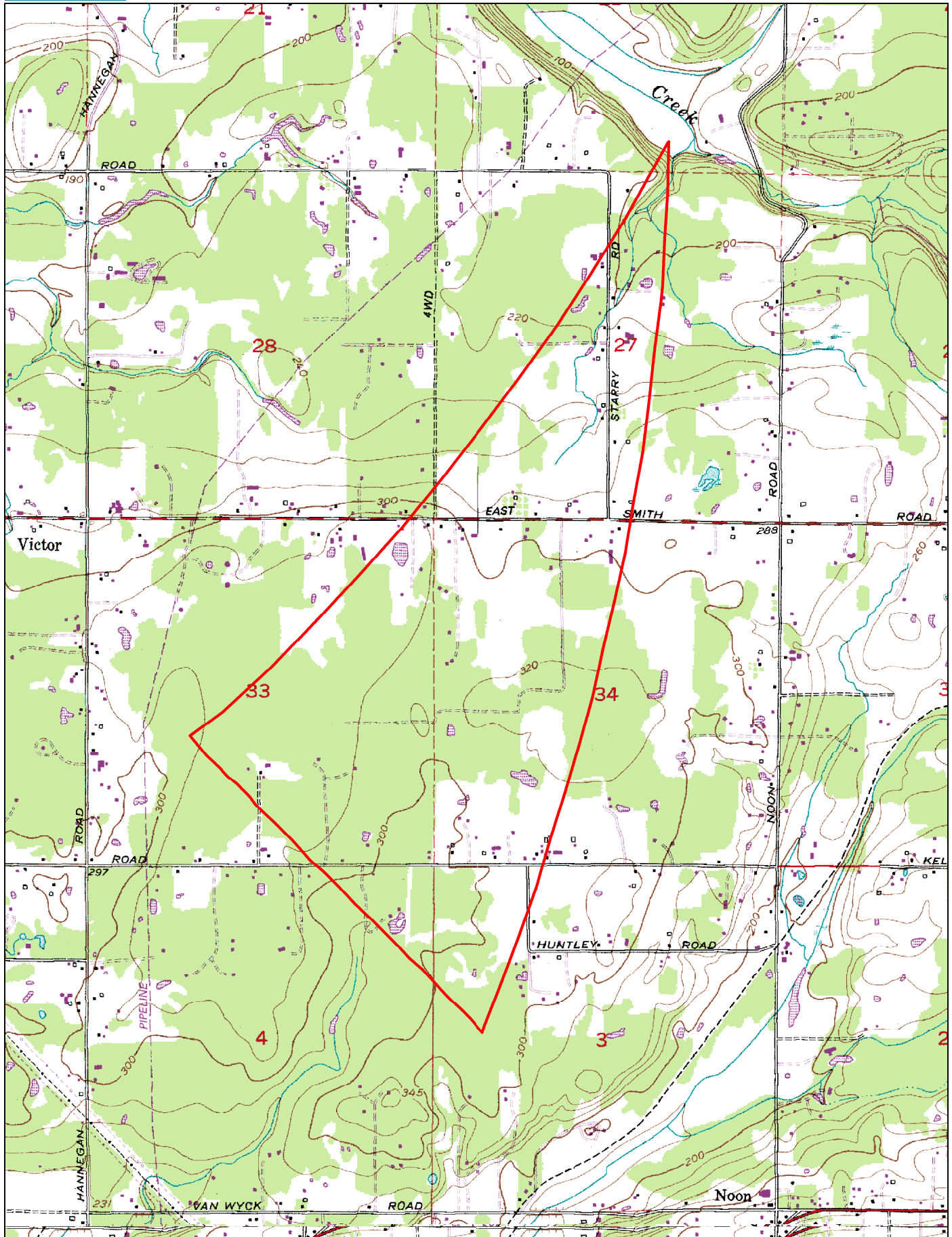


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