

October 2005
KISW(FM) Channel 260C Seattle, WA
Allocation Study

The attached spacing study shows that the proposed operation meets all domestic co-channel and adjacent channel spacing requirements for Class C stations as prescribed in §73.207 of the Commission's Rules, with the exception of a short-spacing to the licensed operation of KHHK Channel 259C3 at Yakima. Processing pursuant to §73.215 of the Commission's Rules is requested with respect to KHHK, and the attached allocation study map is included to demonstrate the lack of prohibited contour overlap with that facility.

Canadian Short-Spacings

The attached spacing study indicates short-spacings to Canadian stations and allotments as follows:

CBUF-FM-9	259A	Victoria, BC
New	260C	Abbotsford, BC
CBU-FM-7	260A	Chilliwack, BC
CJMG-FM-2	260B	Oliver, BC

Notably, the Abbotsford 260C proposal does not appear in either the latest version of the Canadian FM facilities database or in the Working Arrangement, and is therefore likely an abandoned proposal.

Channel 260C at Seattle (the underlying allotment for KISW) is included in the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service as an unlimited (albeit short-spaced) allotment. Neither CBUF-FM-9 259A Victoria nor CBU-FM-7 260A Chilliwack existed when in 2000 it was first proposed to locate KISW at the West Tiger Mountain transmitter site, and each of those Canadian

stations operates with a negotiated power limitation towards Channel 260C at Seattle.¹ Since KISW does not operate with any negotiated power restriction towards Victoria and Chilliwack, it is believed that the station is entitled to operate with maximum Class C facilities in the direction of Victoria and Chilliwack.

CJMG-FM-2 Channel 260B Oliver, British Columbia, Canada

The proposed operation is short-spaced to Canadian station CJMG-FM-2, which operates on Channel 260B at Oliver, British Columbia. Under the terms of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the required co-channel Class C to Class B spacing is 274 kilometers, whereas the distance between the KISW site and the CJMG-FM-2 site is 249 kilometers. The attached allocation study map demonstrates that the proposed KISW 38 dBu F(50,10) contour will not overlap the CJMG-FM-2 54 dBu F(50,50) contour. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CJMG-FM-2 54 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 65 kilometers.²

Therefore, the proposed KISW operation is believed to be in full compliance with domestic and international allotment requirements.

¹ CBUF-FM-9 Victoria: "Limited to 550W and 250m towards 260C Seattle, WA." CBU-FM-7 Chilliwack: "Limited to 2.4 kW and 30m towards 260C Seattle."

² In actuality, CJMG-FM-2 operates on a specially negotiated short-spaced allotment limited to A) 0.285 kW ERP and 1103 meters HAAT or the equivalent along the 125 degree azimuth towards Channel 260C in Spokane, WA and B) 2.4 kW ERP and 708 meters HAAT along the 226.5 degree azimuth towards KISW. The instant application errs on the conservative side by assuming omnidirectional operation for CJMG-FM-2.

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SEARCH PARAMETERS FM Database Date: 041025

Channel: 260C 99.9 MHz
 Latitude: 47 30 14
 Longitude: 121 58 29
 Safety Zone: 32 km
 Job Title: KISW 260C SEATTLE

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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K205DD CP	BREMERTON WA	BPFT-050304AAW	206D 89.1	0.011 477.0	47-32-58 122-46-56	275.1	61.02 0.00	0 TRANS
K206DL LIC	GRANITE FALLS/EVERET WA	BLFT-050314AAS	206D 89.1	0.005 639.0	48-03-06 121-51-37	7.9	61.51 0.00	0 TRANS
K206CJ LIC	ISSAQUAH WA	BLFT-030320ACJ	206D 89.1	0.003 772.0	47-30-32 121-59-09	303.7	1.00 0.00	0 TRANS
KASB LIC	BELLEVUE WA	BLFT-941	207D 89.3	0.008 18.0	47-36-17 122-11-47	304.1	20.10 0.00	0 CLS=D
K207AZ LIC	GIG HARBOR WA	BLFT-010507ABF	207D 89.3	0.033 49.0	47-15-14 122-37-13	240.5	56.12 0.00	0 TRANS
K207AP LIC	SUMMER AND LAKE TAPP WA	BLFT-880115TH	207D 89.3	0.020 148.0	47-13-27 122-12-28	209.5	35.74 0.00	0 TRANS
KDDSaux LIC	ABERDEEN WA	BXLH-000822ABQ	257C1 99.3	0.680 615.0	46-58-31 123-08-21	236.7	105.96 0.00	0 AUX
KDDSaux LIC	ELMA WA	BLH-040723ACJ	257C 99.3	41.000 620.0	47-19-12 123-20-41	259.3 SS	105.40 0.40	105 CLOSE
KDDSaux CP	ELMA WA	BMXPH-050208AFA	257C 99.3	0.900 630.0	46-58-31 123-08-16	236.6	105.87 0.00	0 AUX
KDDSaux APP	ELMA WA	BPH-050601AMD	257C 99.3	64.000 742.0	47-18-46 123-22-15	259.1 SS	107.49 2.49	105 CLOSE
KDDSaux CP	ELMA WA	BXPH-041025AEP	257C 99.3	0.680 630.0	46-58-31 123-08-16	236.6	105.87 0.00	0 AUX
KDDSaux RSV	ELMA WA	-	257C 99.3	0.000 0.0	47-14-17 123-40-45	257.7	132.09 27.09	105 CLEAR
K205DO CP	CAPE GEORGE WA	BPFT-040330AAW	258D 99.5	0.005 687.0	48-00-58 122-55-32	309.1	91.24 0.00	0 TRANS
K258BJ CP	EVERETT WA	BNPFT-030828BBB	258D 99.5	0.015 190.0	48-01-28 122-06-40	350.1	58.77 0.00	0 TRANS

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KCTK-LP CP	MOUNT VERNON WA	BNPL-010615ACI	258L1 99.5	0.100 -24.3	48-26-24 122-20-03	345.7	107.49 0.00	0 LPPM
KAAP LIC	ROCK ISLAND WA	BLH-970616KD	258A 99.5	5.300 DA -25.0	47-22-52 120-17-15	95.5	127.99 32.99	95 CLEAR
CBUFFM9 PROP NOTE:	VICTORIA BC -	-	259A 99.7	1.200 DA 143.0	48-30-20 123-28-23	315.5	157.81 -24.19	182 SHORT
SEE TEXT FOR DISCUSSION								
K259BG CP	CHEHALIS WA	BNPFT-030826AOB	259D 99.7	0.200 188.0	46-48-15 123-11-45	230.3	120.94 0.00	0 TRANS
NEW-T APP	CHELAN WA	BNPFT-030317CCF	259D 99.7	0.002 871.0	47-48-24 120-02-09	76.2	149.50 0.00	0 TRANS
KHHK LIC	YAKIMA WA	BLH-990520KA	259C3 99.7	4.100 245.0	46-31-20 120-20-08	130.7	165.67 -10.33	176 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 165 KM								
NEW	ABBOTSFORD BC -	-	260C 99.9	18.000 DA 336.8	49-03-48 122-12-55	354.2	174.32 -131.68	306 SHORT
NOTE: SEE TEXT FOR DISCUSSION								
CBU-FM-7 OPER	CHILLIWACK BC -	-	260A 99.9	0.790 219.0	49-06-36 121-50-47	3.0	178.85 -68.15	247 SHORT
NOTE: SEE TEXT FOR DISCUSSION								
CJMG2FM	OLIVER BC -	-	260B 99.9	0.180 DA 921.0	49-08-08 119-40-08	42.4	249.33 -24.67	274 SHORT
NOTE: SEE TEXT FOR DISCUSSION								
	PARKSVILLE BC -	-	260B1 99.9	0.000 0.0	49-17-40 124-19-25	319.8	264.38 5.38	259 CLOSE
K262AL CP	ICICLE CREEK WA	BPFT-041210ABP	260D 99.9	0.250 DA 16.0	47-33-55 120-40-52	85.5	97.64 0.00	0 TRANS
NEW-T APP	MANSON WA	BNPFT-030317CCA	260D 99.9	0.007 478.0	47-51-15 120-10-04	73.3	141.16 0.00	0 TRANS
NEW-T APP	MANSON WA	BNPFT-030317EBO	260D 99.9	0.099 DA 246.0	47-51-52 120-02-20	73.8	150.77 0.00	0 TRANS

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K207DM CP	PORT ANGELES WA	BPFT-041021ACZ	260D 99.9	0.010 434.0	DA 48-04-10 123-26-52	300.3	127.04 0.00	0 TRANS
NEW-T APP	RICHLAND WA	BNPFT-030317KJO	260D 99.9	0.250 77.0	46-20-40 119-20-43	121.9	238.17 0.00	0 TRANS
KISWaux LIC	SEATTLE WA	BXLH-001018ACN	260C 99.9	50.000 388.0	DA 47-32-35 122-06-25	293.7	10.87 0.00	0 AUX
KISW LIC	SEATTLE WA	BLH-000204AAG	260C 99.9	58.000 714.0	DA 47-30-14 121-58-29	0.0 SS	0.00 -290.00	290 SHORT
	BURNABY BC	RM-	261D 100.1	0.000 0.0	49-16-45 122-55-05	340.9	209.41 27.41	182 CLEAR
CHRHFM	MAPLE RIDGE BC	-	261D 100.1	0.050 21.0	49-12-57 122-36-05	346.6	195.95 0.00	0 TRANS
NEW-T APP	CHELAN WA	BNPFT-030317CCE	261D 100.1	0.002 871.0	47-48-24 120-02-09	76.2	149.50 0.00	0 TRANS
NEW-T APP	PATEROS WA	BNPFT-030317ABE	261D 100.1	0.001 1303.0	48-01-00 119-58-57	68.3	159.87 0.00	0 TRANS
NEW-T APP	SATSOP WA	BNPFT-030314AIE	261D 100.1	0.005 493.0	46-53-30 123-24-59	238.5	128.71 0.00	0 TRANS
NEW	VICTORIA BC	-	262C 100.3	0.000 0.0	48-35-41 123-32-37	316.7	168.50 15.50	153 CLEAR
NEW	VICTORIA BC	-	262C 100.3	100.000 494.0	DA 48-35-41 123-32-37	316.7	168.50 15.50	153 CLEAR
NEW-T APP	CAMANO WA	BNPFT-030317KPA	262D 100.3	0.115 143.0	48-05-11 122-34-56	325.2	79.16 0.00	0 TRANS
NEW-T APP	COAL CREEK WA	BNPFT-030317ACB	262D 100.3	0.015 414.0	47-32-31 122-06-28	293.0	10.88 0.00	0 TRANS
K262AL LIC	ICICLE CREEK WA	BLFT-041025ACY	262D 100.3	0.250 16.0	DA 47-33-55 120-40-52	85.5	97.64 0.00	0 TRANS

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NEW-T APP	LONGVIEW WA	BNPFT-030317MYF	262D 100.3	0.080 69.0	46-56-44 122-56-36	230.0	96.10 0.00	0 TRANS
NEW-T APP	LONGVIEW WA	BNPFT-030317MEI	262D 100.3	0.080 69.0	46-56-44 122-56-36	230.0	96.10 0.00	0 TRANS
NEW-T APP	MCCLEARY WA	BNPFT-030312BEX	262D 100.3	0.007 758.0	46-58-31 123-08-16	236.6	105.87 0.00	0 TRANS
NEW-T APP	MERCER ISLAND WA	BNPFT-030311ARG	262D 100.3	0.010 224.0	47-36-57 122-18-26	296.6	27.95 0.00	0 TRANS
NEW-T APP	NEWCASTLE WA	BNPFT-030317ACC	262D 100.3	0.015 411.0	47-32-31 122-06-28	293.0	10.88 0.00	0 TRANS
NEW-T APP	OLYMPIA WA	BNPFT-030314ADU	262D 100.3	0.140 141.0	47-03-44 122-49-49	233.0	81.24 0.00	0 TRANS
NEW-T APP	ORTING WA	BNPFT-030310ASW	262D 100.3	0.010 517.0	47-02-52 122-08-33	194.1	52.27 0.00	0 TRANS
NEW-T APP	SEATTLE WA	BNPFT-030317KJA	262D 100.3	0.028 292.0	47-36-57 122-18-26	296.6	27.95 0.00	0 TRANS
NEW-T APP	TACOMA WA	BNPFT-030317KIH	262D 100.3	0.250 7.0	47-12-26 122-19-26	218.7	42.23 0.00	0 TRANS

44444 END OF FM SPACING STUDY FOR CHANNEL 260 44444



