

FURTHER DOCUMENTATION IN SUPPORT OF WAIVER REQUEST OF SECTION 73.870(A)

SBK is here amending its application to more comprehensively elucidate the limiting “unique” circumstances that necessitates relocation to non-adjacent channel 298, requiring a waiver request of Section 73.870(a). The primary waiver request is located within the Engineering Attachment. The scenario concerning KBQS-LP is as follows:

- (1) SBK has not found a way to effectively overcome the second adjacent interference requirement. KBQS-LP is 41.6 km away from second-adjacent channel KRXQ, within its 60 dBu contour. KRXQ’s signal strength is 70.6 dBu at KBQS-LP’s current site. A zero-population buffer of 206.5 meters is required around the antenna to permit a second adjacent waiver. Two ASR towers are available within the proximity of Section 73.807 full spacing:

(A) ASRN 1269735 Height: 21.5 m

(B) ASRN 1275687 Height: 9.0 m

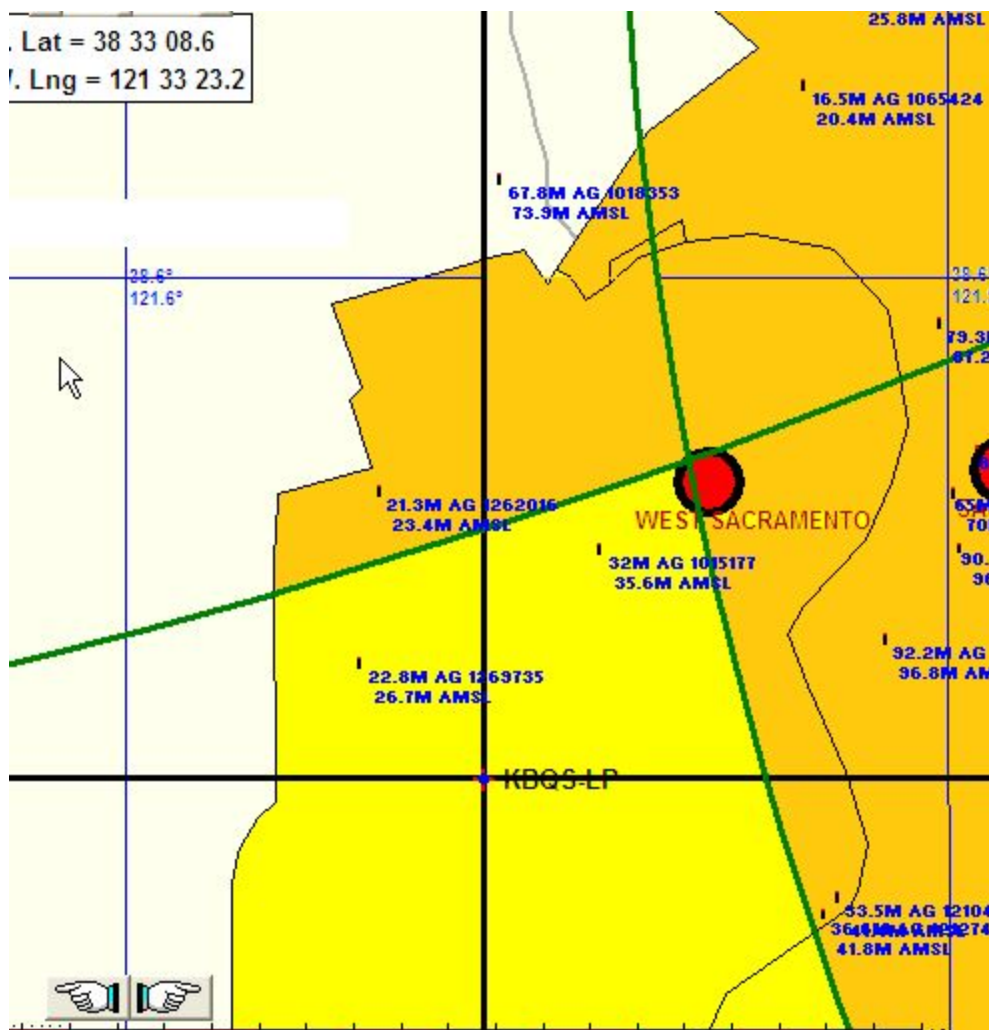


Figure 1: ASR map (yellow is within full spacing)

Both towers are unsuitable for co-location given their small heights. Alternately, SBK does not have the required \$100,000's to buy land, acquire permits, and build a tower of over 50 meters in height (pending authorization from the City of West Sacramento)—it is beyond the revenue scope of LPFM. KBQS-LP previously downgraded to 50 watts, attempting to utilize a 4-bay array strapped to a tree. The signal was found to be attenuated and had poor coverage. The current 50 watt contour barely inches into Sacramento city proper (Figure 2). The station is effectively unbuildable without abiding by 205.6 m zero-population buffer (or 146 m at 50 watts).

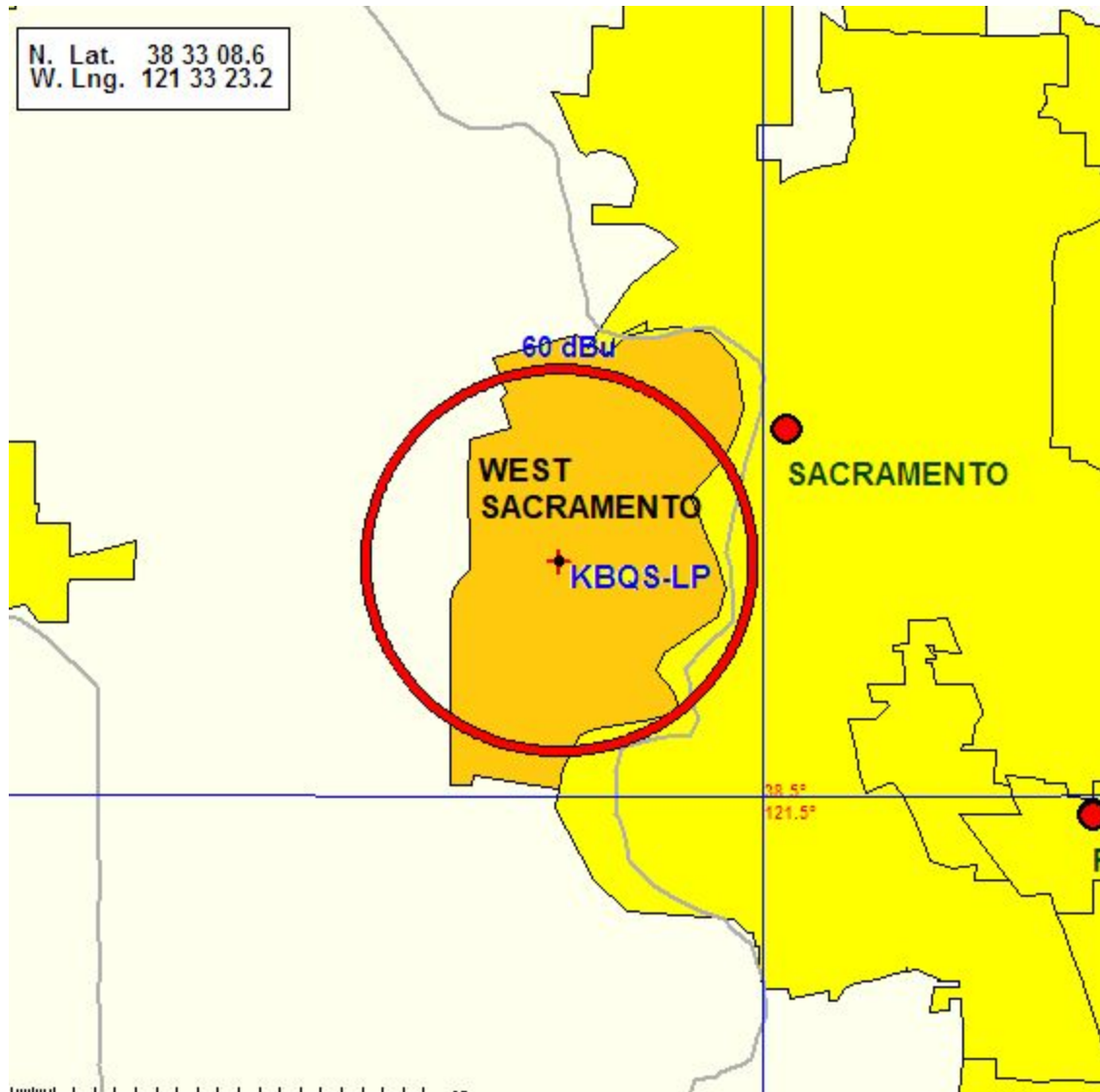


Figure 2: 60 dBu at 50 watts

(2) While it is true K255CL is relocating to the first adjacent channel, the construction permit, File ID BPFT-20170320AAB, expires 04/05/2020. It is plausible that SBK could wait up to almost two years for co-channel interference to cease in order to commence service.

It is believed these circumstances constitute unique obstacles precluding the execution of the Low Power FM station on its current channel. The licensee believes the grant of a waiver

of Section 73.870(a) would be in the public interest for this case because of the additional constraints of: (A) The availability of feasibly-priced tall structures without intervening population are not available to facilitate licensing the facility. (B) The prospect of waiting as much as two years to run a facility unencumbered by rife co-channel interference could be considered an untenable wait for being dark and is prohibited via Section 312(g) of the Communications Act of 1934. Because of the latter, the might be forced to operate simply to create interference with K255CL, which is not in the public interest. These additionally factors should be taken into consideration regarding waiver reconsideration within BPL-20180117ABJ.