

Spacing of proposed allotment. No change in allotment is being requested. The existing allotment is fully spaced to all authorized stations and allotments.

Compliance with § 73.215. The actual transmit site specified in this application is short-spaced to the licensed facility of KKZX, Spokane, WA, channel 255C as well as the unassigned Canadian allotment for Fernie, BC, channel 256B.

The distance from the transmit site herein specified to KKZX's transmit site, calculated as required in 47 C.F.R. § 73.208, is **185.3 km**. This exceeds the minimum spacing requirement of 176 km found in § 73.215.

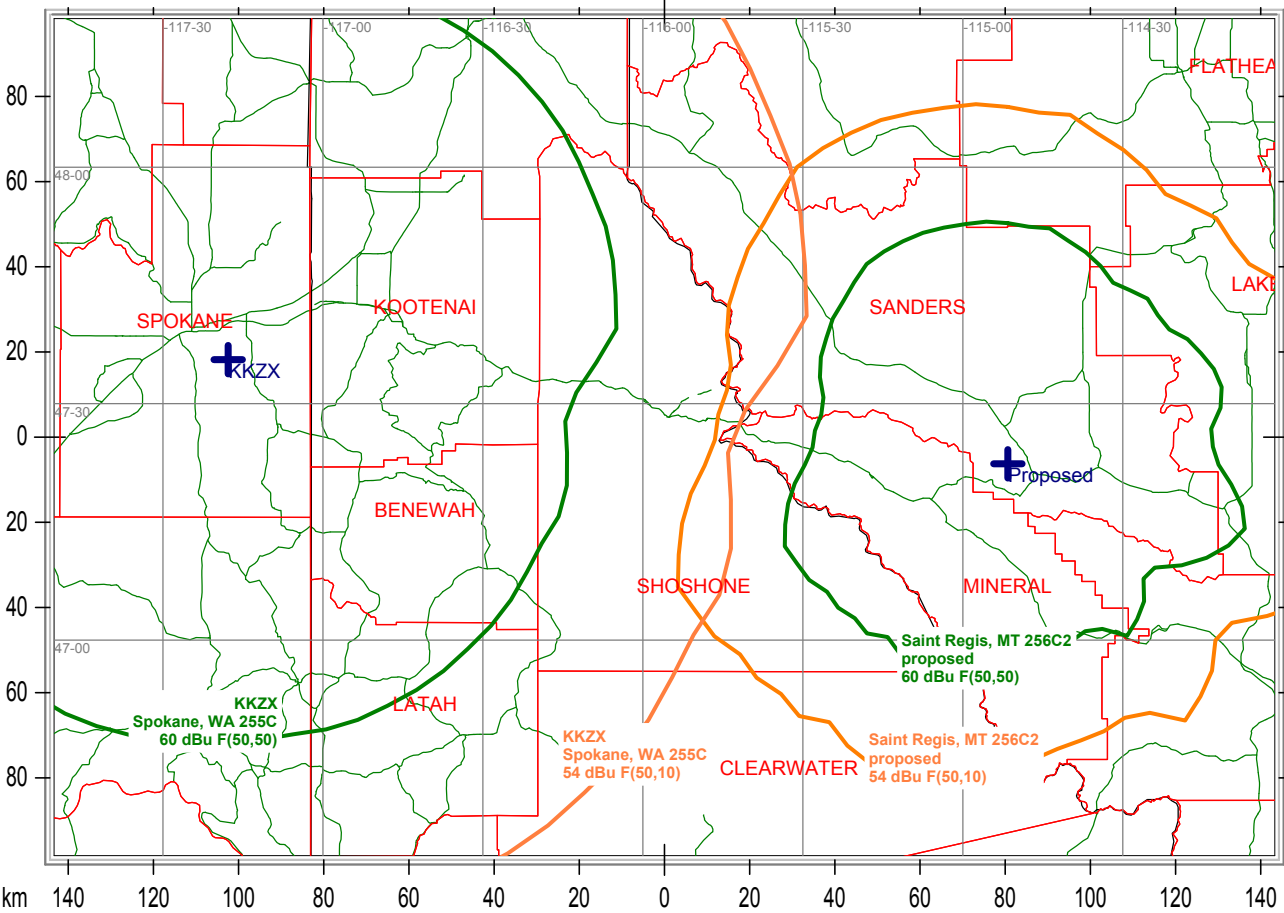
As shown in the attached contour map, the 54 dBu interfering contour of each station clears the 60 dBu protected contour of the other. In accordance with § 73.215, contours for the proposed facility are based on actual facilities and contours for KKZX are based on maximum facilities. Hence, this proposal complies with the provisions of § 73.215 with respect to the licensed facility of KKZX, Spokane, WA, channel 255C.

On page 3 of this exhibit are the 54 dBu F(50,50) and 34 F(50,10) contours of this proposal and the allotment for Fernie, BC, channel 256B at maximum facilities. As shown, there is no overlap. Section 5.2.2 of the US-Canada FM Broadcasting Working Arrangement states:

Proposed allotments which do not conform to the Table of Minimum Distance Separations set out in this Arrangement shall normally be considered acceptable for technical coordination if objectionable interference would not be caused within the protected service contour of existing co-channel and adjacent channel allotments or assignments (except LPFM's).

This proposal does not create any objectionable interference as defined in the subsections of 5.2.2 of the Arrangement. Therefore, it should be acceptable to the Canadian administration.

Saint Regis, MT, channel 256C2 vs. KKZX, Spokane, WA, channel 255C



County Borders State Borders Highways Lat/Lon Grid

Saint Regis, MT, channel 256C2 Proposed vs. Fernie, BC, channel 256C Allotment

