

**FM Translator K204BI
Bellingham, Washington Channel 204D
Allocation Study
November 2006**

Background

On December 13, 2004, Pacific Lutheran University, Inc. ("PLU") filed its application BPFT-20041213ABN for modification of FM translator K204BI at Bellingham, Washington. By letter dated October 16, 2006, the FCC notified PLU of a Canadian coordination problem with respect to a Channel 204 operation at Abbotsford, British Columbia. The suggestion was made that the use of a directional antenna might permit both stations to co-exist.

Research into the Canadian databases indicates that the Canadian facility in question must be the Channel 204LP grant to Trinity Lutheran Church in Abbotsford. The CRTC approved the Abbotsford application by Broadcasting Decision CRTC 2004-146 on April 16, 2004. But that facility was not included in the FCC database when this firm conducted the allocation study for K204BI several months later. Indeed, the Abbotsford 204LP operation was only entered into the US database within the past six months, based on review of archival databases which this firm maintains.

Regardless, it is clear that the Abbotsford 204LP facility was authorized by the time the K204BI application was originally filed. Therefore, the instant amendment to BPFT-20041213ABN proposes the use of a directional antenna to provide the required interference protection to the Abbotsford facility. In order to implement this directional antenna, this application also includes a change in the antenna height and ERP.

The attached allocation study maps demonstrate compliance with the Commission's Rules for protection of FM broadcast stations and FM translators as outlined in §74.1204.

Cochannel

With regard to co-channel facilities, the only existing facilities close enough to require detailed study are Canadian station CHNW-FM Channel 204LP New Westminster, and the authorized 204LP facility at Abbotsford, British Columbia. The attached allocation study map demonstrates that there is no overlap of the proposed 34 dBu F(50,10) contour to the 54 dBu F(50,50) contours of CHNW-FM or Abbotsford 204LP. (Note that CHNW-FM and Abbotsford 204LP are Class LP stations according to the Canadian database, equivalent to a domestic Class D or translator stations.)

1st Adjacent

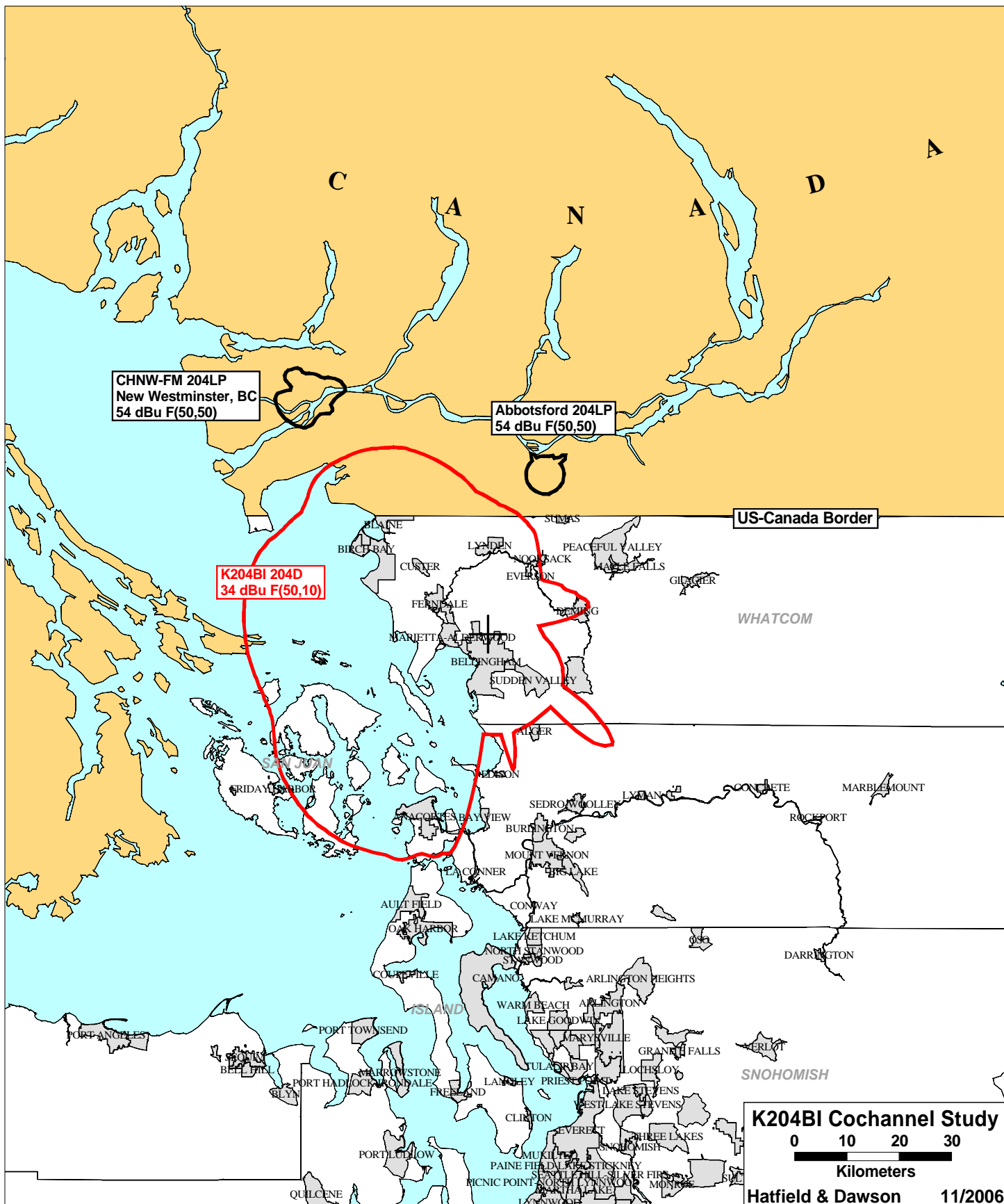
With regard to first-adjacent-channel facilities (other than co-owned parent station KPLU-FM), the only existing facilities close enough to require detailed study are Canadian stations and allotments at Chilliwack, Harrison Hot Springs, Surry, and Victoria. The attached allocation study map demonstrates that there is no overlap of the proposed 48 dBu F(50,10) contour to Canadian land areas.

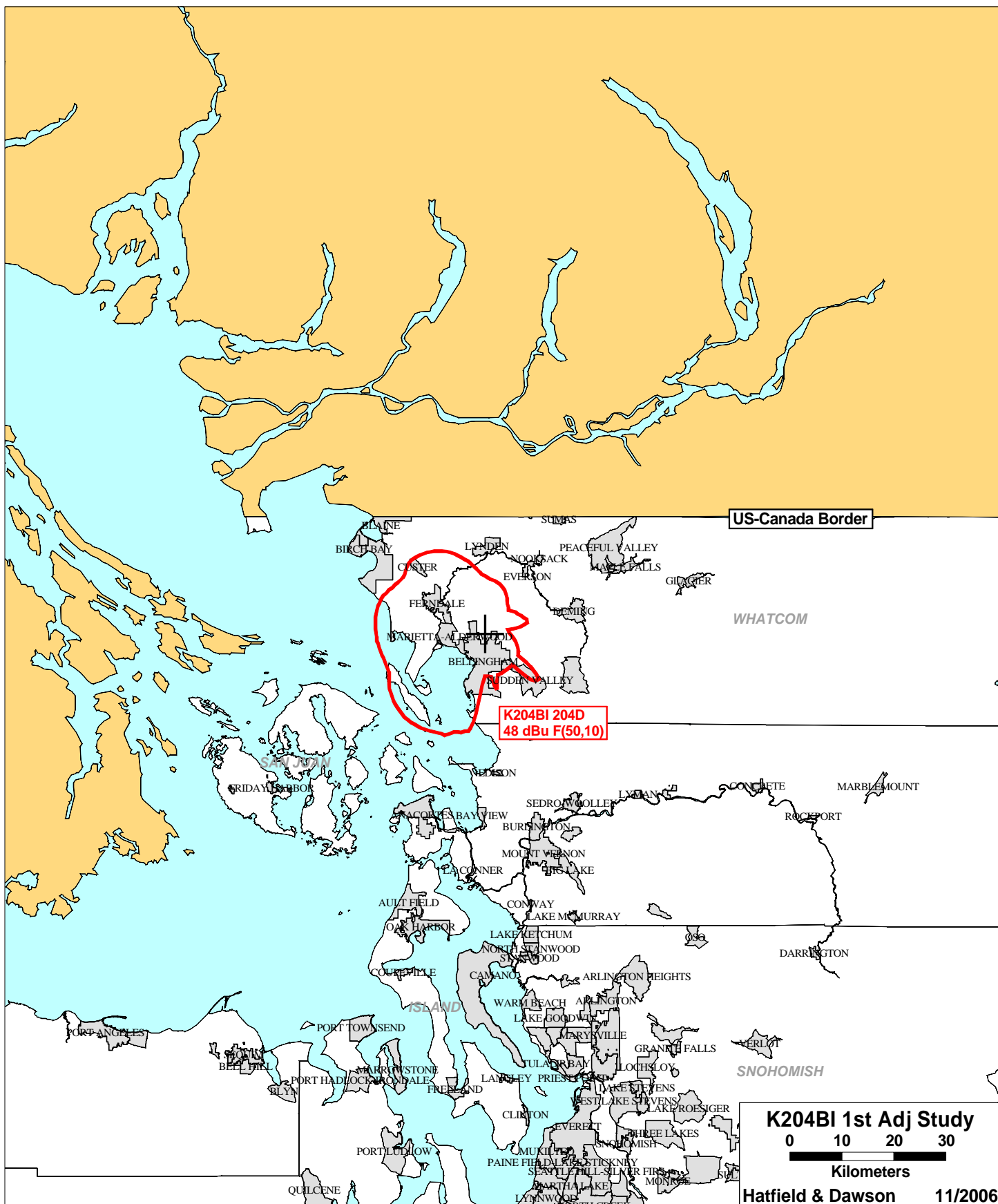
2nd and 3rd Adjacent

With regard to second- and third-adjacent-channel facilities, there is no overlap of the proposed 94 dBu F(50,10) contour to Canadian land areas.

Domestically, there is no overlap of the proposed 100 dBu F(50,10) contour to the 60 dBu contour of FM translator K201FH Bellingham, for both the licensed and authorized operations of that station.

The proposed 100 dBu F(50,10) contour is completely encompassed by the licensed and authorized 60 dBu contours of third-adjacent-channel station KUGS Channel 207A Bellingham. However, the same circumstance pertains to the licensed K204BI 100 dBu F(50,10) contour, and the two stations have co-existed with no known interference problems for well over 12 years. The extent of the licensed overlap area (i.e. the area of the licensed 100 dBu F(50,10) contour) is less than 0.5 sq km, as is the extent of the proposed overlap area (0.26 sq km). Therefore, since the extents of both the licensed and proposed overlap areas are less than 0.5 sq km, the existing overlap area is believed to be grandfathered. Waiver of Section 74.1204 of the Commission's Rules with respect to overlap caused to KUGS is respectfully requested to the extent required.





US-Canada Border

WHATCOM

K204BI 204D
48 dBu F(50,10)

SNOHOMISH

K204BI 1st Adj Study

0 10 20 30
Kilometers

Hatfield & Dawson 11/2006

