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7 August 2001

Magalie Roman Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

ATTENTION: Audio Services Division, MMB - Rudy Bonacci
REFERENCE: KYMG(FM) Anchorage, AK, BPH-19960111IS
Directional Antenna Pattern RMS

Dear Madame Secretary:

When the measured directional pattern RMS of the Dielectric antenna installed for KYMG is calculated using 10° evenly spaced azimuths, the RMS is found to be 83.6% of the RMS of the authorized directional composite pattern. This is below the 85% specified in §73.316(ix)(A) of the Commission's Rules. This rule requires:

For a station authorized pursuant to §73.215 or §73.509, a showing that the root mean square (RMS) of the measured composite antenna pattern (encompassing both the horizontally and vertically polarized radiation components (in relative field)) is at least 85 percent of the RMS of the authorized composite directional antenna pattern (in relative field).

However, this rule applies only to contour protection stations authorized under §73.215 or §73.509 of the Commission's Rules. This policy was clarified in the Report and Order in MM Docket No. 96-58 ("Minor Changes Without a Construction Permit") at Paragraph 60:

The policy objective of the proposed rule is to prevent this [wasted spectrum]. Thus, we will apply the proposed rule only to directional noncommercial educational FM stations authorized pursuant to 47 C.F.R. Section 73.509 and directional stations authorized pursuant to 47 C.F.R. Section 73.215. It will not be applied to fully spaced commercial stations utilizing a directional antenna simply to conserve energy by restricting radiation over unpopulated areas.

The KYMG directional facility is not authorized under either §73.215 or §73.509. The purpose of the KMYG directional antenna is to provide protection to the FCC Anchorage Monitoring Station. KYMG is fully-spaced with respect to all co-channel and adjacent channel stations, and is entitled to full protection as an omnidirectional station. It is in the best interests of KYMG to retain such protection in case the Anchorage Monitoring Station is relocated.

Since KYMG is not authorized as a contour protection station, we believe that the 85% RMS requirement does not pertain in this case.

Please call or e-mail with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Lockwood', with a stylized flourish at the end.

Stephen S. Lockwood, P.E.