

EXHIBIT 1

SANTA ROSA, CA CHANNEL 262 APPLICATION – BNPFT-20030317BUQ LPFM NON-PRECLUSION STUDY

Minor amendments are proposed to the Santa Rosa channel 263 translator application including channel, site, ERP, DA antenna and HAAT. In accordance with the Commission's notice (DA 13-427) this short form amendment and LPFM non-preclusion showing are submitted with respect to two spectrum limited markets – Santa Rosa and San Francisco.

LPFM grid points test:

As the LPFM6 outputs included below show, there are no channel 260, 261, 262 or 264 channel points in the Santa Rosa 30X30 spectrum limited grid. Exhibit 1A attached shows that the proposed co-channel 262 adjacent channel LPFM preclusion radius of 26 km does not reach the closest channel 263 LPFM grid point in the Santa Rosa grid. This radius is based on the 0.050 kW ERP and 194 meter 12 radial HAAT which results in a 60 dBu of 12.1 km. It is noted that even a 39 km radius does not reach the San Francisco grid.

LPFM site test:

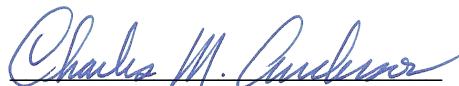
The proposed channel 262 site is in Sonoma County, CA which is part of the San Francisco ARB metro market. Therefore, a site test is provided in accordance with DA 13-427, Appendix B. which instructs that the site test "...ignore LPFM second-adjacent and intermediate-frequency protection requirements..." The Commission's LPFM channel finder tool was used at the proposed site and indicates there are available LPFM channels 222 and 223 at the proposed site. Furthermore, and excerpt of an FM preclusion study is provided herein

demonstrating that other co-channel and first adjacent channel facilities preclude LPFMs on channels 260-264 at the proposed site.

REFERENCE					DISPLAY DATES			
38 29 20.0 N.			Class L1	Preclusions	DATA	04-18-13		
123 01 53.0 W.			Current	Spacings	SEARCH	04-18-13		
Call	Channel	Location			Azi	Dist	FCC	Margin
--- Channel 260 99.9 MHz. ---								
KZST	LIC	261A	Santa Rosa	CA	104.1	32.0	56.0	-23.5
--- Channel 261 100.1 MHz. ---								
KZST	LIC	261A	Santa Rosa	CA	104.1	32.0	67.0	-34.5
--- Channel 262 100.3 MHz. ---								
KZST	LIC	261A	Santa Rosa	CA	104.1	32.0	56.0	-23.5
KTDE	LIC-N	263B1	Gualala	CA	308.9	60.0	74.0	-13.5
--- Channel 263 100.5 MHz. ---								
KTDE	LIC-N	263B1	Gualala	CA	308.9	60.0	87.0	-26.5
640086	APP	263D	Santa Rosa	CA	109.2	32.7	39.0	-5.8
1548777	APP-D	263D	Santa Rosa	CA	173.3	21.1	26.0	-4.5
--- Channel 264 100.7 MHz. ---								
KSXY	LIC	265A	Forestville	CA	30.0	31.7	56.0	-23.8
KTDE	LIC-N	263B1	Gualala	CA	308.9	60.0	74.0	-13.5

Therefore, this application does not preclude the only or any LPFM facility at the proposed site.

It is concluded that the amended Santa Rosa application passes the grid test and the site test. It does not preclude any LPFM channel point in an Appendix A market or any LPFM channel at its proposed site.



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SANTA ROSA, CA LPFM 30X30 GRID

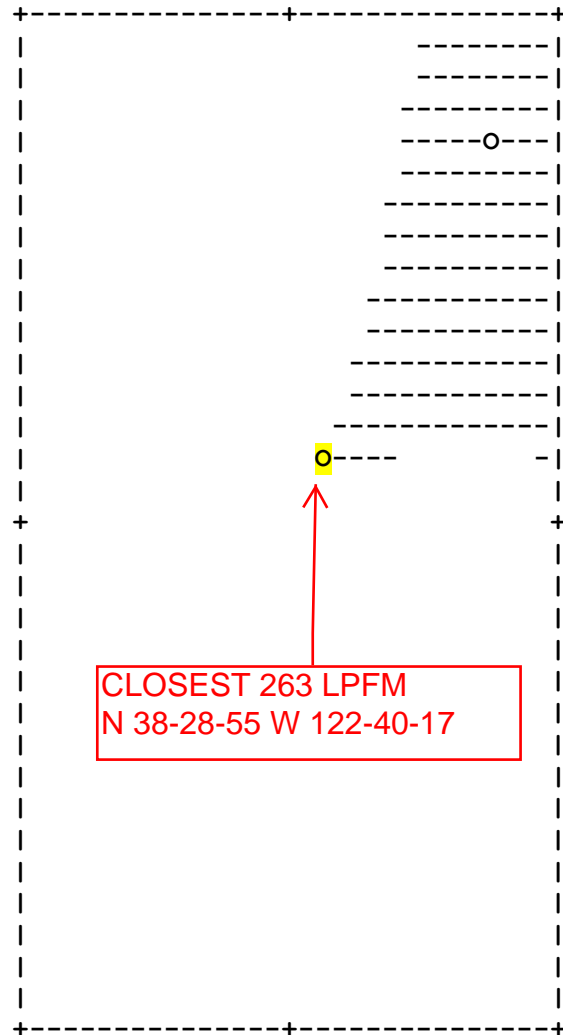
Latitude 38-26-55
 Longitude 122-42-17
 Grid Size 31 x 31
 Micro FM 100 Watts at 30m HAAT
 Co-Channel and 1st Adjacent Protected
 2nd Adjacent Channel Not Protected
 3rd Adjacent Channel Not Protected
 I.F. Not Protected
 TV Channel 6 Protected
 CP Records Protected
 APP Records Protected
 FM Translators Protected
 TV Channel 6 Translators/LP Protected
 Auc83 FX App Records Not Protected

Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail	Chan	Avail
200	0	220	0	240	0	260	0	280	0
201	0	221	0	241	40	261	0	281	0
202	0	222	456	242	134	262	0	282	0
203	0	223	444	243	0	263	138	283	3
204	0	224	0	244	0	264	0	284	0
205	0	225	0	245	56	265	0	285	0
206	0	226	0	246	0	266	0	286	0
207	0	227	43	247	0	267	70	287	5
208	0	228	0	248	0	268	0	288	0
209	0	229	0	249	0	269	0	289	0
210	0	230	0	250	0	270	0	290	0
211	0	231	1	251	0	271	0	291	0
212	0	232	0	252	0	272	0	292	0
213	0	233	16	253	129	273	8	293	11
214	0	234	0	254	0	274	0	294	24
215	0	235	73	255	0	275	0	295	0
216	0	236	0	256	31	276	9	296	0
217	0	237	0	257	0	277	174	297	0
218	0	238	0	258	0	278	0	298	0
219	0	239	0	259	0	279	3	299	0
								300	0

 Total 1868

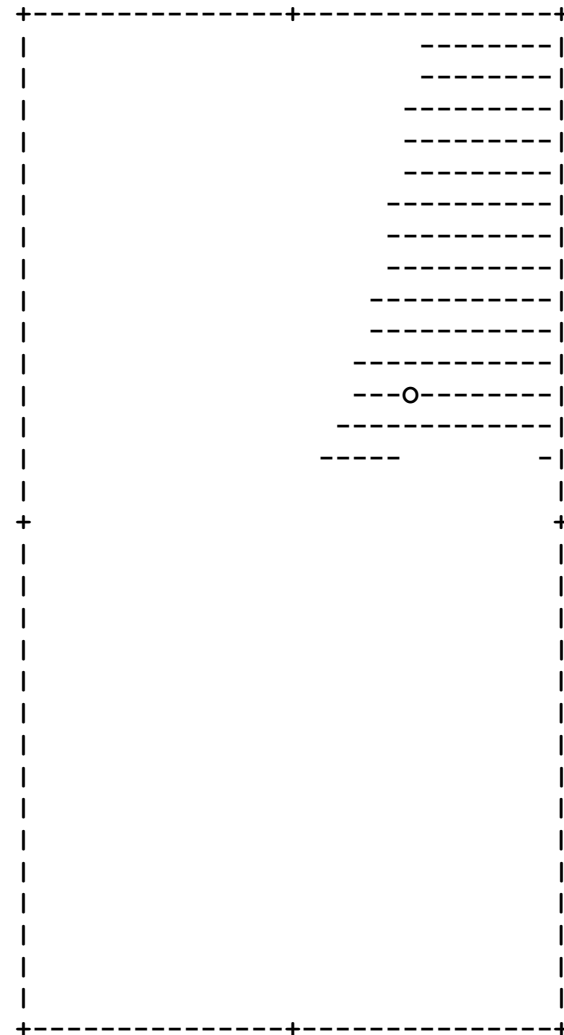
Total allotments, least preclusive spacing: 37
 Total allotments, most preclusive spacing: 27

SANTA ROSA, CA
Latitude 38-26-55
Longitude 122-42-17
Least preclusive siting
Availability of Channel 263 (X)



Point #421 at 38-28-55 122-40-17
Point #121 at 38-38-55 122-30-17

SANTA ROSA, CA
Latitude 38-26-55
Longitude 122-42-17
Most preclusive siting
Availability of Channel 263 (X)



Point #268 at 38-30-55 122-35-17

EXHIBIT 1A

SANTA ROSA 30X30 LPFM GRID (GRAY)

ANDERSON ASSOCIATES

NEW

Sonoma

Windsor

263 LPFM

Santa Rosa

Rohnert Park

Petaluma

NEAREST CH 263 POINT
N 38-28-55 W 122-40-17

Napa

12 RADIAL HAAT = 194 M
60 DBU AT 0.050 KW = 12.1 KM
ADJACENT CHANNEL PRECLUSION
CIRCLE = 26 KM

DOES NOT REACH CLOSEST CH 263
LPFM POINTS.

39 KM RADIUS DOES NOT
REACH SAN FRANCISCO GRID

Marin

Vallejo

Benicia

Martinez

San Rafael

Larkspur

Mill Valley

San Pablo

Richmond

Berkeley

Piedmont

Daly City

San Francisco

San Francisco

Alameda

San Leandro

Castroville

Ha

Un

San Bruno

Millbrae

San Mateo

Belmont

SAN FRANCISCO 30X30 GRID (GRAY)

NEW

Latitude: 38-29-20 N
Longitude: 123-01-53 W
ERP: 0.05 kW
Channel: 262
Frequency: 100.3 MHz
AMSL Height: 363.0 m
Elevation: 340.0 m
Horiz. Pattern: Directional

Scale 1:600,000

0 8 16 24 km

EXHIBIT 1B



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Audio Division

Low Power FM (LPFM) Channel Finder

(202)-418-2700

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Thu Apr 18 15:46:05 2013

EXCLUDES second-adjacent channel spacings
EXCLUDES intermediate frequency (I.F.) spacings

Input options:

Latitude, Longitude: 38° 29' 20", 123 1' 53"

Google Map: [5.6 km radius \(approximate 60 dBu service contour coverage\)](#)



CONDITIONAL. The requested latitude and longitude meet the PROPOSED LPFM spacing requirements for one or more second adjacent and/or intermediate frequency (I.F.) channels.

These proposed spacing rules are not yet in effect.

Channels Available for LPFM LP100 Stations
[Channels 201 to 300, [corresponding to 88.1 to 107.9 MHz](#)]

Channel 222 ---- 92.3 MHz
Channel 223 ---- 92.5 MHz

4/18/2013 2:46 PM