TECHNICAL STATEMENT
K267CD LOVELAND, COLORADO
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
APRIL 2016

This Technical Statement is made in support of a minor change application for FM translator station, K267CD Loveland, Colorado, facility ID 158249. K267CD seeks to relocate its current authorization to a new site, and remain a fill-in translator for KVAM(AM) Loveland, Colorado, facility ID 35517. The following will show that the new proposed operation of K267CD will meet all of the Commissions technical requirements for an FM translator station.

The proposed operation of K267CD specifies a maximum Effective Radiated Power of 0.04 kilowatts. It will operate with a directional antenna with an "off the shelf" type antenna, or a Scala CA-5/CP with circular polarization. The antenna will be mounted on an existing tower with an over height of 27 meters above the ground. The antenna will be mounted with a Center of Radiation of 13 meters above the ground, and 2083 meters Above Mean Sea Level. The coordinates of this tower are located at N 40° 29' 37", W 105° 10' 53", NAD 27.

Figure 1 is a detailed interference study conducted on channel 267D with these new proposed facilities. It shows that the new operation of K267CD will not cause any interference to any existing or proposed FM stations on any of the pertinent same channel or adjacent channels to channel 267, with the exception of KOLT-FM Cheyenne, Wyoming on channel 264C1, facility ID 30225, and K269EQ Loveland, Colorado, facility ID 140256. No actual interference will be cause to either of these 2nd and 3rd

adjacent channel stations since the proposed worst case 100 dBμ interference contour will not cover any population. See the predicted 100 dBμ interference contour map at Figure 2. The applicant, Mountain Community Translators, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference. There are no homes nearby the proposed existing tower site, which is a privately owned 40 acre square wooded area, with private access. The transmitter building is uninhabited and does not have indoor plumbing. Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K267CD until such interference can be eliminated.

Figure 3 is the directional antenna data for the proposed Scala HDCA-10 antenna system proposed to be used.

Figure 4 shows the present and proposed 60 dBμ contour for K267BU. There will be overlap between the two as required.

The proposed operation of K267CD Loveland will be considered a “Fill-In” operation for KVAM(AM) Loveland, Colorado. KVAM(AM) operates with 7 kilowatts daytime with a non-direction antenna system on 1570 kHz. Figure 5 shows that the proposed 60 dBμ contour for the proposed K267CD will not extend beyond the daytime 2.0 mV/m contour of KVAM. It will also not extend beyond a 25 miles radius from the KVAM tower site. Since this is a “Fill-In” translator, the maximum ERP will not exceed the maximum permissible ERP of 250 watts in any azimuth.

It was found that the new proposed operation of K267CD Loveland, Colorado on channel 267D, will satisfy all of the required commission rules and regulations for an FM translator station.

FIGURE 1 - DETAILED CHANNEL INTERFERENCE STUDY
K267CD LOVELAND, CO, CH. 267D

REFERENCE CH# 267D - 101.3 MHz, Pwr= 0.04 kW DA, HAAT= 337.4 M, COR= 2083 M DISPLAY DATES
40 29 37.0 N. Average Protected F(50-50)= 15.08 km DATA 04-19-16
105 10 53.0 W. Standard Directional SEARCH 04-19-16

CH CALL CITY	TYPE ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
267D K267BU**	LIC DV_	318.1	18.49	40 37 02.0	0.250	75.8	16.9	-60.7	-27.3**
Laramie	WY	138.0	BLFT20150813ACC	105 19 40.0		2587	Mountain Community Transla		
266C KOSI	LIC DC_	183.1	85.03	39 43 44.0	100.000	110.5	73.8	-30.5*	1.1
Denver	CO	3.1	BLH20150622AFR	105 14 08.0	513	2280	Bonneville International C		
267D ~~K267CD~~	LIC DH_	217.7	10.18	40 25 16.0	0.001	21.0	0.6	-18.0*	-27.3
Loveland	CO	37.7	BLFT20160318ACD	105 15 18.0		1960	Mountain Community Transla		
268C KJHM	LIC NCX	121.3	120.93	39 55 22.0	97.000	138.3	93.2	-23.6*	17.9
Strasburg	CO	302.1	BMLH20141014ACF	103 58 18.0	625	2109	Max Radio Of Denver Llc		
269D K269EQ	LIC _C_	0.0	0.00	40 29 37.0	0.010	0.2	10.6	-6.0*	-10.7*
Loveland	CO	0.0	BLFT20110103AAQ	105 10 53.0	338	2085	Mountain Community Transla		
264C1 KOLT-FM	LIC NC_	21.5	66.32	41 02 55.0	100.000	9.6	69.8	51.1	-3.6*
Cheyenne	WY	201.7	BLH20080625AAB	104 53 28.0	202	2103	Citicasters Licenses, Inc.		
268D K267BU	CP DC_	318.2	18.38	40 37 00.0	0.005	10.7	6.0	2.5	5.8
Laramie	WY	138.1	BPFT20151026AAL	105 19 36.0		2545	Mountain Community Transla		
267C0 KOZY-FM	LIC _C_	36.7	187.81	41 50 23.0	100.000	163.2	65.0	18.6	100.0
Bridgeport	NE	217.6	BLH20010827AAD	103 49 36.0	339	1630	Legacy Communications, Llc		
270D K280EQ	CP DV_	106.5	28.45	40 25 15.0	0.020	0.3	5.3	22.4	22.1
Greeley	CO	286.7	BPFT20160129AYN	104 51 35.0		1571	Cedar Cove Broadcasting, I		
268D KJHM-FM1	LIC DC_	163.8	94.59	39 40 31.0	20.000	60.1	39.8	28.4	43.5
Commerce City	CO	344.0	BLFTB20050802ABY	104 52 22.0	84	1766	Max Radio Of Denver Llc		
270C2 KIGN	LIC _CN	31.7	81.63	41 07 01.0	50.000	5.1	45.6	70.9	35.4
Burns	WY	212.1	BMLH19950920KD	104 40 07.0	150	1963	Townsquare Media Cheyenne		
269D K269AE	LIC ?HN	182.7	59.25	39 57 38.0	0.103	0.7	12.8	49.7	46.4
Boulder	CO	2.7	BLFT221	105 12 52.0	-58	1747	Kse Radio Ventures, Llc		
268D KJHM-FM6	CP DV_	155.7	83.13	39 48 39.0	8.000	6.6	2.8	70.5	60.9
Commerce City	CO	336.0	BNPFTB20130815AAL	104 46 52.0	11	1635	Max Radio Of Denver Llc		
268D K268BX	LIC _C_	24.0	78.17	41 08 09.0	0.250	10.1	7.1	62.4	62.9
Cheyenne	WY	204.2	BLFT20130514ACH	104 48 07.0	5	1879	Brahmin Broadcasting Corpo		
266D K277BP	CP _C_	24.0	78.17	41 08 09.0	0.250	10.1	7.1	62.4	62.9
Cheyenne	WY	204.2	BPFT20160129ACJ	104 48 07.0		1874	Cedar Cove Broadcasting, I		
264D K264BO	LIC DC_	183.1	85.00	39 43 45.0	0.099	0.7	21.5	75.3	63.3
Granby	CO	3.1	BLFT20160211ACO	105 14 08.0		2262	Mountain Community Transla		
268D K268CK	LIC DC_	183.1	84.97	39 43 46.0	0.002	11.0	7.0	65.0	69.5
Golden	CO	3.1	BLFT20131101AJL	105 14 08.0		2251	Mary Medicus		
270C3 KXWA	LIC NC_	174.7	123.58	39 23 07.0	9.500	5.5	58.5	109.8	65.1
Centennial	CO	354.8	BLH20071207AAY	105 02 52.0	163	2226	Way Media, Inc.		
270D K270AL	LIC DC_	232.0	81.61	40 02 24.0	0.250	0.3	4.1	71.3	74.7
Granby	CO	51.5	BLFT20120118AES	105 56 11.0	-165	2530	Alwaysmountaintime, Llc		
268D KJHM-FM3	CP DV_	164.0	87.01	39 44 24.0	0.750	3.6	2.6	76.2	73.5
Denver	CO	344.2	BNPFTB20130430ACQ	104 54 05.0	8	1644	Max Radio Of Denver Llc		
268D KJHM-FM5	CP DV_	154.5	94.32	39 43 35.0	6.500	8.4	6.1	79.5	74.5
Greenwood Village	CO	334.8	BNPFTB20130430ACU	104 42 23.0	64	1762	Max Radio Of Denver Llc		
268D KJHM-FM4	CP DV_	166.7	89.34	39 42 38.0	0.100	1.7	1.6	80.2	76.6
Glendale	CO	346.8	BNPFTB20130430ACS	104 56 25.0	29	1675	Max Radio Of Denver Llc		
269D K269CL	LIC DHN	185.5	97.07	39 37 24.0	0.035	0.0	2.0	87.8	87.0
Evergreen	CO	5.4	BLFT19950811TB	105 17 24.0	354	2646	Citicasters Licenses, Inc.		
269C1 KSKE-FM	LIC ZC_	239.1	161.43	39 44 18.0	12.000	6.4	70.1	145.5	90.1
Eagle	CO	58.1	BLH20050915ADE	106 47 58.0	667	3171	Alwaysmountaintime, Llc		
264D K264AG	LIC _C_	217.8	120.92	39 37 51.0	0.240	1.1	7.0	109.3	113.6
Dillon	CO	37.2	BLFT20060314AAU	106 02 47.0	-356	2790	Mountain Community Transla		

CH CALL / CITY	TYPE ANT / STATE	AZI / <--	DIST / FILE #	LAT / LNG	PWR(kW) / HAAT(M)	INT(km) / COR(M)	PRO(km) / LICENSEE	*IN* (Overlap in km)	*OUT*
264C KGFT	LIC ZCY	171.9	196.05	38 44 43.0	78.000	8.6	85.5	179.4	110.5
Pueblo	CO	352.1	BMLH20010216AAB	104 51 39.0	676	2930	Bison Media, Inc		
266D K266BB	LIC _V_	103.2	129.85	40 13 02.0	0.099	9.4	6.5	114.5	114.4
Fort Morgan	CO	284.2	BLFT20070220AAI	103 41 46.0	36	1360	First Ventures Capital Par		

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
All separation margins (if shown) include rounding. Call signs with strikeout need not be protected.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside restricted contour.

* No actual interference will be caused to second and third adjacent channel stations K269EQ and KOLT-FM since the proposed 100 dbu interference contour will not cover any population. See the Technical Statement for more details.

** K267BU Laramie, WY is no longer operating on channel 267. It has built out its Construction Permit on channel 268, BPFT-20151026AAL and has a pending license application BPFT-20151026AAL. Thus, this record can be ignored.

FIGURE 2 - PREDICTED 100 DBU INTEFERENCE CONTOUR
K267CD LOVELAND, CO, CH. 267D

Coverage Study - NGDC 30 SEC
04-19-2016

K267CD CH267 D , 0.04 kW, 337.4m HAAT, 2083.0m COR AMSL
Interference Contour = 100 dBu. Population = 0

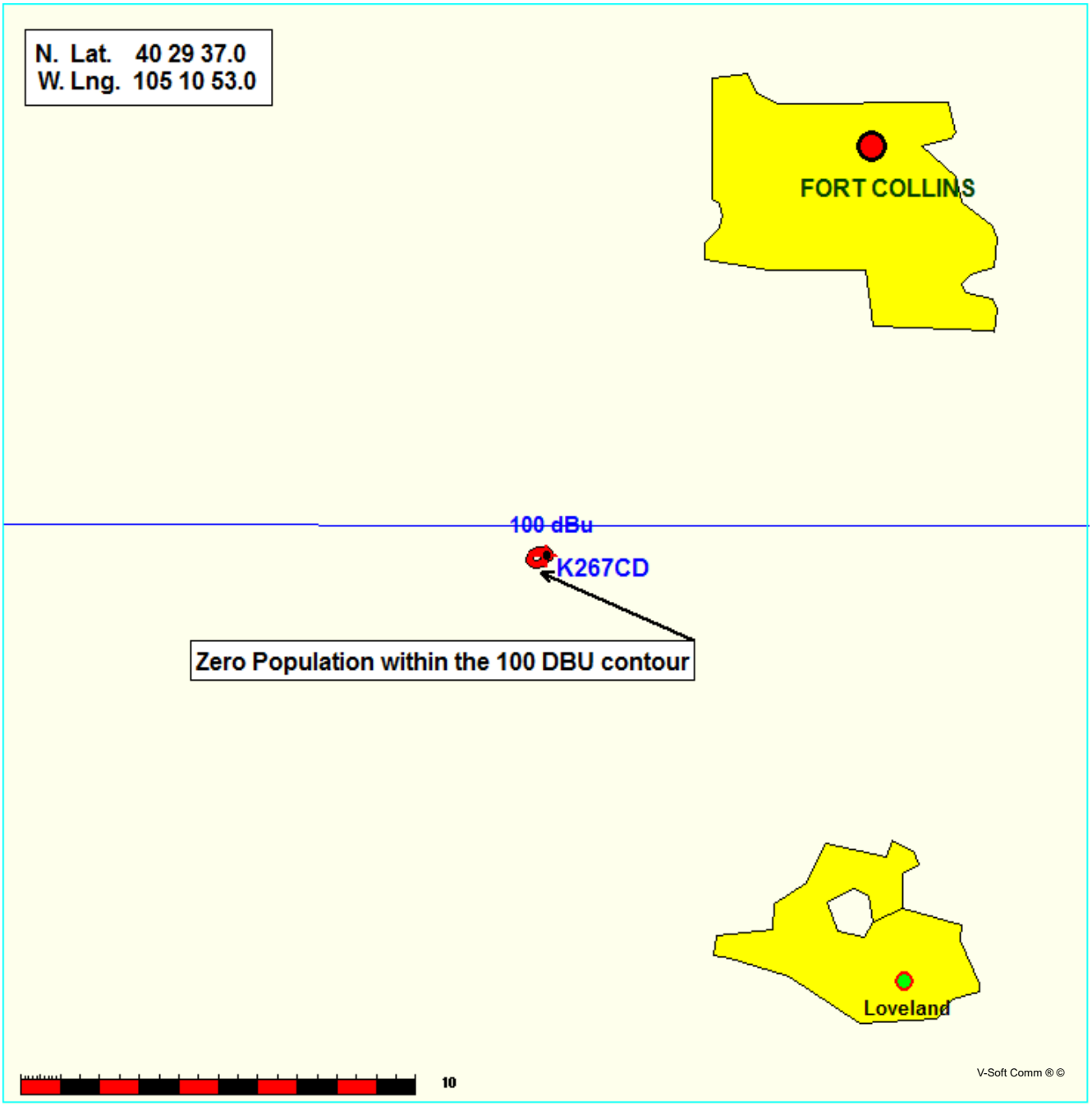


FIGURE 3 K267CD Loveland, Colorado Directional
Antenna Data Scala CA-5-CP

04-19-2016

RMS(V)= .432

Azi	Field	dBk	kW
000	0.187	-28.543	0.001
010	0.171	-29.319	0.001
020	0.140	-31.057	0.001
030	0.123	-32.181	0.001
040	0.135	-31.373	0.001
050	0.160	-29.897	0.001
060	0.182	-28.778	0.001
070	0.193	-28.268	0.001
080	0.182	-28.778	0.001
090	0.160	-29.897	0.001
100	0.135	-31.373	0.001
110	0.123	-32.181	0.001
120	0.140	-31.057	0.001
130	0.171	-29.319	0.001
140	0.187	-28.543	0.001
150	0.181	-28.826	0.001
160	0.157	-30.061	0.001
170	0.142	-30.934	0.001
180	0.134	-31.437	0.001
190	0.190	-28.404	0.001
200	0.329	-23.635	0.004
210	0.528	-19.527	0.011
220	0.718	-16.857	0.021
230	0.866	-15.229	0.030
240	0.952	-14.407	0.036
250	1.000	-13.979	0.040
260	0.952	-14.407	0.036
270	0.866	-15.229	0.030
280	0.718	-16.857	0.021
290	0.528	-19.527	0.011
300	0.329	-23.635	0.004
310	0.190	-28.404	0.001
320	0.134	-31.437	0.001
330	0.142	-30.934	0.001
340	0.157	-30.061	0.001
350	0.181	-28.826	0.001

Graph is Relative Field

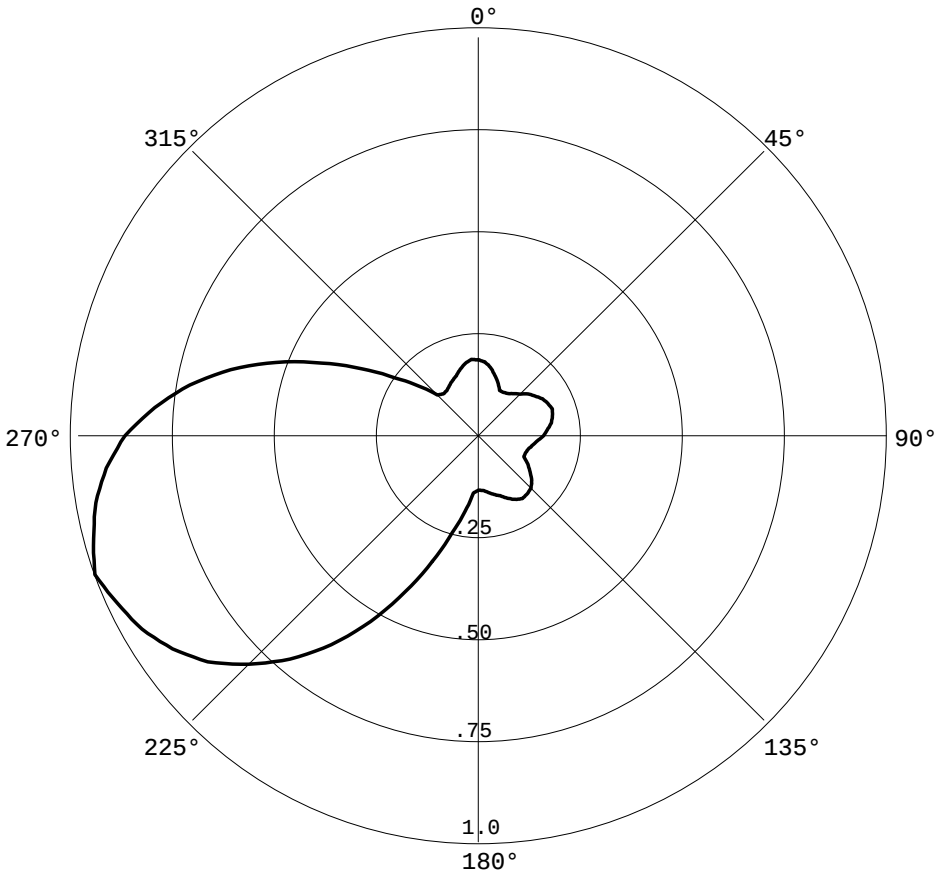
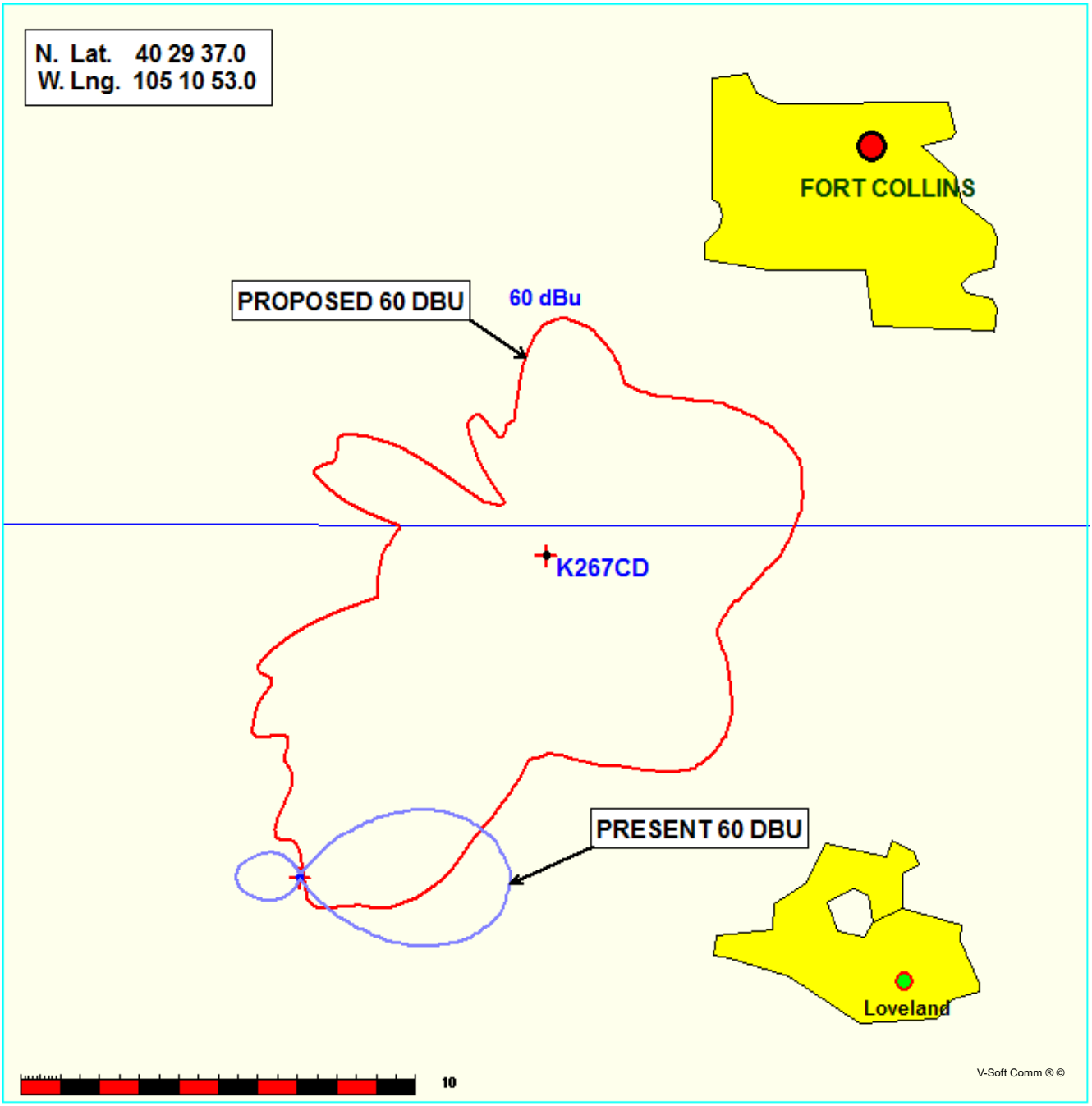


FIGURE 4 - PRESENT AND PROPOSED 60 DBU
K267CD LOVELAND, CO, CH. 267D

Coverage Study - NGDC 30 SEC
04-19-2016



K267CD
BLFT20110103AAQ
Latitude: 40-29-37 N
Longitude: 105-10-53 W
ERP: 0.04 kW
Channel: 267
Frequency: 101.3 MHz
AMSL Height: 2083.0 m
Elevation: 1997.205 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None