Request for Waiver – Displacement Relief
University of Wyoming
Minor Change to FM Translator Station K210AF, Torrington, WY

The University of Wyoming (Wyoming) respectfully requests a waiver of Section 74.1233(a)(1) of the FCC's Rules in connection with the instant application for a minor change to the license facility of FM translator station K210AF, Torrington, WY. This application seeks displacement relief to modify the existing FM translator station for use of Channel 219.

FM Translator Displacement:

FM translator Station K210AF has been in use by Wyoming since it was originally licensed in 1984 (see File No. BLFT- 19840206MD). Presently, however, station K210AF is facing displacement from its operating frequency due to the grant of the license for KEUW, FCC File No. BLED20140312AAN (Attachment 1). The full-service FM station's authorization displaces Wyoming's FM translator K210AF and requires that, to continue to operate, the translator must broadcast over a different frequency. Wyoming requested and received a Special Transmitting Authority to go silent on July 1, 2014, with an application to extend the STA filed on 12/31/2014.

Channel Availability and Preclusion

The Channel Preclusion studies in Attachments 2 and 3 to this request demonstrate that Wyoming cannot use any adjacent, second adjacent, third adjacent or I.F. channel in connection with the displacement modification of FM translator K210AF. As a result, Wyoming is unable to propose a channel change for this translator which corresponds with the minor change provisions of Section 74.1233(a)(1), which states that a major change for an FM translator station is "...is any change in frequency (output channel) except changes to first, second or third adjacent channels, or intermediate frequency channels, and any change in antenna location where the station would not continue to provide 1 mV/m service to some portion of its previously authorized 1 mV/m service area. All other changes will be considered minor." It should be noted that the use of minor change, 2nd adjacent, channel 208 will cause contour overlap within the normally protected 60 dBu of KEUW. Further, it is our experience that the six kW R.F. energy coming from the co-located KEUW antenna, operating only 0.4 MHz from the displaced translator station antenna, will overcome the final stage of the translator, causing the VSWR to fold back the translator's power, thereby causing the translator to be unable to achieve its licensed ERP. For this reason, and the reason expressed above, a change of frequency to a minor change channel is not an option for K210AF.

(Continued)

Use of Channel 219

As detailed in the instant application, however, Wyoming may utilize the proposed channel 219 for this FM translator station in compliance with all applicable protection requirements and technical considerations. Accordingly, Wyoming requests a waiver of Section 74.1233(a)(1) to permit displacement of K210AF to channel 219. Wyoming respectfully submits that the public interest will be well served by the requested channel change and waiver, which would allow continued use of this FM translator station to broadcast noncommercial educational programming to Torrington, WY area. Wyoming utilizes FM translator K210AF to rebroadcast the signal of co-licensed noncommercial educational radio station KUWY(FM), Laramie, WY. As part of the Wyoming Public Radio statewide network of public radio stations, KUWY and K210AF provide a mix of local and national noncommercial educational programming, including news, public affairs, and talk for their local communities.

Doug Vernier Telecommunications Consultants

Attachment 1

K210AF - Displacement on Channel 210
University Of Wyoming

REFERENCE CH# 210D - 89.9 MHz, Pwr= 0.25 kW, HAAT= 2.6 M, COR= 1299 M
42 04 35.0 N. Average Protected F(50-50)= 7.09 km
104 11 28.0 W. Omni-directional
DISPLAY DATES
DATA 02-24-15
SEARCH 02-24-15

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
210A Torrington	KEUW	LIC _C_ WY		0.0 0.0	0.00 BLED20140312AAN	42 04 35.0 104 11 28.0	6.000 4	68.3 1299	15.8 University Of Wyoming	-75.4*	-39.5*
210D Torrington	~~K210AF~~	LIC _C_ WY		0.0 0.0	0.00 BLFT20080123AAI	42 04 35.0 104 11 28.0	0.250 3	23.8 1299	7.1 University Of Wyoming	-30.8*	-30.8*
212D Scottsbluff	K212EJ	LIC _V_ NE		108.7 289.1	46.75 BLFT20070905AAS	41 56 25.0 103 39 20.0	0.205 54	1.0 1303	9.5 Calvary Chapel Of Twin Fal	36.8	35.1
208D Scottsbluff	K208CK	LIC _CN NE		108.6 289.0	46.70 BLFT19970306TG	41 56 28.0 103 39 21.0	0.170 53	0.9 1303	9.0 Bible Broadcasting Network	36.9	35.5
209C0 Loveland	KXGR	LIC _EX CO		210.7 29.9	187.90 BLED20081218AEY	40 37 03.0 105 19 40.0	80.000 372	132.8 2561	89.4 Calvary Chapel Aurora	48.1	87.9
212C2 Cheyenne	KWYC	LIC _CX WY		192.7 12.5	97.90 BLED20100511ABH	41 13 01.0 104 26 53.0	20.500 130	4.2 1848	40.8 Calvary Chapel Of Twin Fal	86.6	55.8
06 D Crawford	K06KR-D	LI D_N NE		44.2 224.7	92.49 BLDTV20081125ANV	42 40 13.0 103 24 09.0	0.028 100	3.3 1179	3.0 Nebraska Educational Telec	6.3R	86.2M
06 D Chadron	K06JC-D	LI D_N NE		49.5 230.3	127.11 BLDTV20081121AKA	42 48 46.8 103 00 22.0	0.066 155	3.3 1153	5.4 Nebraska Educational Telec	8.7R	118.4M
06NT Denver	KXDP-LP	LI D_N CO		201.4 20.7	257.63 BLTVL20100716ABT	39 54 48.0 105 17 33.0	3.000 879	3.3 2536	3.0 Syncom Media Group, Inc.	134.5R	123.1M
06 T Denver	KXDP-LP	CP D_N CO		201.4 20.7	257.63 BDFCDVL20141003ACE	39 54 48.0 105 17 33.0	3.000 879	3.3 2536	3.0 Syncom Media Group, Inc.	134.5R	123.1M
06 2 Hayes Center	KWNB-DR	APR _HN NE		120.4 302.5	309.25 BPRM20080801BDB	40 37 32.0 101 01 45.0	3.000 221	1.1 1160	19.3 Pappas Telecasting Of Cent	134.5R	174.8M
06 2C Hayes Center	KWNB-TV	LI _HN NE		120.4 302.5	309.25 BLCDT20090604ABL	40 37 32.0 101 01 45.0	11.900 221	3.3 1160	3.0 Pappas Telecasting Of Cent	134.5R	174.8M
06 2C Hayes Center	KWNB-TV	AP _HN NE		120.4 302.5	309.25 BDSTA20121024ABA	40 37 32.0 101 01 45.0	6.300 221	3.3 1160	3.0 Pappas Telecasting Of Cent	134.5R	174.8M
06 2C Hayes Center	KWNB-TV	AP _HN NE		120.4 302.5	309.25 BDSTA20110930BHG	40 37 32.0 101 01 45.0	6.300 221	3.3 1160	3.0 Pappas Telecasting Of Cent	134.5R	174.8M
06 D Broadus	K06AA-D	LI __N MT		346.2 165.4	382.34 BLDTV20101103ACF	45 24 38.0 105 21 28.0	0.088 160	3.3 1078	3.0 Powder River T.v. Board	134.5R	247.8M
06 D Aspen	K06HU-D	LI D_N CO		216.0 34.3	387.50 BLDTV20130103AEF	39 13 33.0 106 50 08.0	0.006 594	3.3 2855	3.0 Pitkin County Translator D	134.5R	253.0M
06 D New Castle	K06GW-D	LI D_N CO		226.3 44.1	396.12 BLDTV20101013AAO	39 33 56.0 107 31 57.0	0.005 251	3.3 1940	3.0 Rocky Mountain Public Broa	134.5R	261.6M

Terrain database is FCC 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.

Doug Vernier Telecommunications Consultants

Attachment 2

CHANNEL PRECLUSION STUDY
K210AF - Preclusion of Adjacent Channels
University Of Wyoming

REFERENCE — Class= D , Pwr=0.25 kW, HAAT= 2.6 M, COR= 1299 M — DISPLAY DATES
42 04 35. N. — Average Protected F(50-50)= 7.09 km — DATA 02-24-15
104 11 28. W. — Omni-directional — SEARCH 02-24-15

CH	CALL	TYPE	ANT	AZI.	DIST	LAT.	Pwr(kW)	INT(km)	PRO(km)	*IN*	*OUT*
CITY		STATE		<--	FILE #	LNG.	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)	
--- Channel 207	89.3 MHz. ---										
206C3	KDAI	LIC	_CX	131.4	39.75	41 50 21.0	1.400	48.3	32.0	-18.3*	-5.8
Scottsbluff		NE		311.7	BLED20080523AER	103 49 53.0	238	1532	Educational Media Foundati		
210A	KEUW	LIC	_C_	0.0	0.00	42 04 35.0	6.000	1.6	15.8	-8.7*	-16.9*
Torrington		WY		0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
210D	~~K210AF~~	LIC	_C_	0.0	0.00	42 04 35.0	0.250	1.1	7.1	-8.2*	-8.2*
Torrington		WY		0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
06 D	K06KR-D	LI	D_N	44.2	92.49	42 40 13.0	0.028	3.3	3.0	6.3R	86.2M
Crawford		NE		224.7	BLDTV20081125ANV	103 24 09.0	100	1179	Nebraska Educational Telec		
06 D	K06JC-D	LI	D_N	49.5	127.11	42 48 46.8	0.066	3.3	5.4	8.7R	118.4M
Chadron		NE		230.3	BLDTV20081121AKA	103 00 22.0	155	1153	Nebraska Educational Telec		
--- Channel 208	89.5 MHz. ---										
210A	KEUW	LIC	_C_	0.0	0.00	42 04 35.0	6.000	1.6	15.8	-8.7*	-16.9*
Torrington		WY		0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
210D	~~K210AF~~	LIC	_C_	0.0	0.00	42 04 35.0	0.250	1.1	7.1	-8.2*	-8.2*
Torrington		WY		0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
06 D	K06KR-D	LI	D_N	44.2	92.49	42 40 13.0	0.028	3.3	3.0	6.3R	86.2M
Crawford		NE		224.7	BLDTV20081125ANV	103 24 09.0	100	1179	Nebraska Educational Telec		
06 D	K06JC-D	LI	D_N	49.5	127.11	42 48 46.8	0.066	3.3	5.4	8.7R	118.4M
Chadron		NE		230.3	BLDTV20081121AKA	103 00 22.0	155	1153	Nebraska Educational Telec		
--- Channel 209	89.7 MHz. ---										
210A	KEUW	LIC	_C_	0.0	0.00	42 04 35.0	6.000	23.5	15.8	-30.6*	-25.9*
Torrington		WY		0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
210D	~~K210AF~~	LIC	_C_	0.0	0.00	42 04 35.0	0.250	10.1	7.1	-17.2*	-17.2*
Torrington		WY		0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
209C0	KXGR	LIC	_EX	210.7	187.90	40 37 03.0	80.000	192.5	89.4	-11.6*	74.3
Loveland		CO		29.9	BLED20081218AEY	105 19 40.0	372	2561	Calvary Chapel Aurora		
06 D	K06KR-D	LI	D_N	44.2	92.49	42 40 13.0	0.028	3.3	3.0	6.3R	86.2M
Crawford		NE		224.7	BLDTV20081125ANV	103 24 09.0	100	1179	Nebraska Educational Telec		
06 D	K06JC-D	LI	D_N	49.5	127.11	42 48 46.8	0.066	3.3	5.4	8.7R	118.4M
Chadron		NE		230.3	BLDTV20081121AKA	103 00 22.0	155	1153	Nebraska Educational Telec		
--- Channel 210	89.9 MHz. ---										
210A	KEUW	LIC	_C_	0.0	0.00	42 04 35.0	6.000	68.3	15.8	-75.4*	-39.5*
Torrington		WY		0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
210D	~~K210AF~~	LIC	_C_	0.0	0.00	42 04 35.0	0.250	23.8	7.1	-30.8*	-30.8*
Torrington		WY		0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
06 D	K06KR-D	LI	D_N	44.2	92.49	42 40 13.0	0.028	3.3	3.0	6.3R	86.2M
Crawford		NE		224.7	BLDTV20081125ANV	103 24 09.0	100	1179	Nebraska Educational Telec		
06 D	K06JC-D	LI	D_N	49.5	127.11	42 48 46.8	0.066	3.3	5.4	8.7R	118.4M
Chadron		NE		230.3	BLDTV20081121AKA	103 00 22.0	155	1153	Nebraska Educational Telec		
--- Channel 211	90.1 MHz. ---										
210A	KEUW	LIC	_C_	0.0	0.00	42 04 35.0	6.000	23.5	15.8	-30.6*	-25.9*
Torrington		WY		0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
210D	~~K210AF~~	LIC	_C_	0.0	0.00	42 04 35.0	0.250	10.1	7.1	-17.2*	-17.2*
Torrington		WY		0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
214C3	KUWV	LIC	_CX	4.2	28.73	42 20 02.8	14.000	3.6	35.9	18.0	-8.3*
Lingle		WY		184.2	BLED20110316AAQ	104 09 56.2	96	1510	University Of Wyoming		
06 D	K06KR-D	LI	D_N	44.2	92.49	42 40 13.0	0.028	3.3	3.0	6.3R	86.2M
Crawford		NE		224.7	BLDTV20081125ANV	103 24 09.0	100	1179	Nebraska Educational Telec		

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* / in km)
06 D K06JC-D Chadron	LI D_N NE	49.5 230.3	127.11 BLDTV20081121AKA	42 48 46.8 103 00 22.0	0.066 155	3.3 1153	5.4 Nebraska Educational Telec	8.7R	118.4M
--- Channel 212 90.3 MHz. ---									
212C2 KWYC Cheyenne	LIC _CX WY	192.7 12.5	97.90 BLED20100511ABH	41 13 01.0 104 26 53.0	20.500 130	113.0 1848	40.8 Calvary Chapel Of Twin Fal	-22.1*	33.1
210A KEUW Torrington	LIC _C_ WY	0.0 0.0	0.00 BLED20140312AAN	42 04 35.0 104 11 28.0	6.000 4	1.6 1299	15.8 University Of Wyoming	-8.7*	-16.9*
212C KCSP-FM Casper	LIC _CX WY	293.7 112.3	188.66 BLED20140923ABP	42 44 24.0 106 18 23.0	100.000 593	197.8 2554	91.9 Western Inspirational Broa	-16.6*	72.9
214C3 KUWV Lingle	LIC _CX WY	4.2 184.2	28.73 BLED20110316AAQ	42 20 02.8 104 09 56.2	14.000 96	3.6 1510	35.9 University Of Wyoming	18.0	-8.3*
210D ~~K210AF~~ Torrington	LIC _C_ WY	0.0 0.0	0.00 BLFT20080123AAI	42 04 35.0 104 11 28.0	0.250 3	1.1 1299	7.1 University Of Wyoming	-8.2*	-8.2*
06 D K06KR-D Crawford	LI D_N NE	44.2 224.7	92.49 BLDTV20081125ANV	42 40 13.0 103 24 09.0	0.028 100	3.1 1179	3.0 Nebraska Educational Telec	6.2R	86.3M
06 D K06JC-D Chadron	LI D_N NE	49.5 230.3	127.11 BLDTV20081121AKA	42 48 46.8 103 00 22.0	0.066 155	3.1 1153	5.4 Nebraska Educational Telec	8.5R	118.6M
--- Channel 213 90.5 MHz. ---									
214C3 KUWV Lingle	LIC _CX WY	4.2 184.2	28.73 BLED20110316AAQ	42 20 02.8 104 09 56.2	14.000 96	55.0 1510	35.9 University Of Wyoming	-33.6*	-17.3*
210A KEUW Torrington	LIC _C_ WY	0.0 0.0	0.00 BLED20140312AAN	42 04 35.0 104 11 28.0	6.000 4	1.6 1299	15.8 University Of Wyoming	-8.7*	-16.9*
210D ~~K210AF~~ Torrington	LIC _C_ WY	0.0 0.0	0.00 BLFT20080123AAI	42 04 35.0 104 11 28.0	0.250 3	1.1 1299	7.1 University Of Wyoming	-8.2*	-8.2*
267C0 KOZY-FM Bridgeport	LIC _C_ NE	131.0 311.3	40.00 BLH20010827AAD	41 50 23.0 103 49 36.0	100.000 339	12.8 1630	58.8 Legacy Communications, Llc	24.5R	15.5M
06 D K06KR-D Crawford	LI D_N NE	44.2 224.7	92.49 BLDTV20081125ANV	42 40 13.0 103 24 09.0	0.028 100	3.0 1179	3.0 Nebraska Educational Telec	6.0R	86.5M
06 D K06JC-D Chadron	LI D_N NE	49.5 230.3	127.11 BLDTV20081121AKA	42 48 46.8 103 00 22.0	0.066 155	3.0 1153	5.4 Nebraska Educational Telec	8.4R	118.7M

Terrain database is FCC NGDC 30 Sec, R= 73.215 qualifing spacings or FCC minimum spacings in KM, M= Margin KM
In & Out distances between contours are shown at closest points. Reference Zone= West Zone
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.

All separation margins include rounding

Doug Vernier Telecommunications Consultants

Attachment 3

CHANNEL PRECLUSION STUDY
K210AF - Preclusion of IF Channels
University Of Wyoming

REFERENCE — Class= D , Pwr=0.25 kW, HAAT= 2.6 M, COR= 1299 M — DISPLAY DATES
42 04 35. N. — Average Protected F(50-50)= 7.09 km — DATA 02-24-15
104 11 28. W. — Omni-directional — SEARCH 02-24-15

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*
--- Channel 263 100.5 MHz. ---									
210D ~~K210AF~~	LIC _C_	0.0	0.00	42 04 35.0	0.250	23.8	7.1	9.5R	-9.5M
Torrington	WY	0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
210A KEUW	LIC _C_	0.0	0.00	42 04 35.0	6.000	68.3	15.8	9.5R	-9.5M
Torrington	WY	0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		
--- Channel 264 100.7 MHz. ---									
264C1 KOLZ	LIC NC_	207.2	128.24	41 02 55.0	100.000	164.2	65.8	-43.1*	38.6
Cheyenne	WY	26.8	BLH20080625AAB	104 53 28.0	202	2103	Citicasters Licenses, Inc.		
267C0 KOZY-FM	LIC _C_	131.0	40.00	41 50 23.0	100.000	11.1	77.3	19.1	-38.4*
Bridgeport	NE	311.3	BLH20010827AAD	103 49 36.0	339	1630	Legacy Communications, Llc		
210D ~~K210AF~~	LIC _C_	0.0	0.00	42 04 35.0	0.250	23.8	7.1	9.5R	-9.5M
Torrington	WY	0.0	BLFT20080123AAI	104 11 28.0	3	1299	University Of Wyoming		
210A KEUW	LIC _C_	0.0	0.00	42 04 35.0	6.000	68.3	15.8	9.5R	-9.5M
Torrington	WY	0.0	BLED20140312AAN	104 11 28.0	4	1299	University Of Wyoming		

Terrain database is FCC NGDC 30 Sec, R= 73.215 qualifing spacings or FCC minimum spacings in KM, M= Margin KM
In & Out distances between contours are shown at closest points. Reference Zone= West Zone
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.

All separation margins include rounding