

DELAWDER COMMUNICATIONS, INC.

P.O. Box 1095
Ashburn, Virginia 20146-1095
(703) 299-9222

ENGINEERING REPORT

Lead, SD, Channel 244C FM Application

channel 244C, pursuant to Section 73.207 of the FCC Rules, once the involuntary change for KZMX-FM is made. (Note that the 232C allotment site is site restricted 52 kilometers NW of Lead.)

Table 2, attached, is a channel 242A separation study that demonstrates compliance with Section 73.207 for KZMX-FM, Hot Springs, SD. The Applicant respectfully asks the Commission to issue an order to Show Cause why KZMX-FM should not be ordered onto channel 242A².

Show Cause Public Interest Statement

The Public Interest will be served by displacing KZMX-FM to channel 242A thus allowing this proposal for channel 244C. The herein proposed transmitter site is on an existing mountain site (Terry Peak; ASR #1042361) that is not available for use on channel 232C. No other FM channel can support Class C service from this tower site with Lead as the community of license. (There are other existing communication facilities on the mountain range but all such facilities will not work on channel 232C and will work only on channel 244C with the KZMX-FM channel displacement to 242A.)

The proposed channel 244C facility has a 60 dBu F50,50 service contour population of 176,164 persons with line-of-sight ("LOS") service to Rapid City, SD.³ (LOS service to this city is not possible on channel 232C due to the site restriction on channel 232C being significantly to the west of the proposed mountain site.) A maximum Class C facility on channel 232 from the 232C allotment site (using a 92 kilometer radius as service) has a predicted 60 dBu service contour population of only 67,459 persons. Therefore, the channel 244C proposal represents a 161% increase

² The Applicant agrees to bear the reasonable cost associated with the channel displacement of KZMX-FM to channel 242A in accordance with FCC Rules and Policies. The Applicant also supports the alternative channels 272A and 277A that also appear to be available to a displacement of KZMX-FM, should KZMX-FM prefer either of these alternative channels.

³ All population figures of this application are stated for Census year 2010 data.

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over the 232C reference population.

Finally, channel 232C is available for re-allotment to Lead, SD should the FCC grant the two proposed channel substitutions.

SECTION 73.207 SEPARATION STUDY**PROJECT: LEAD, SD, 244C FROM PROPOSED SITE****STUDY COORDINATES: N 44-19-35.0; W 103-50-06.0 (N D-M-S; W D-M-S)**

Call Docket	Channel FacilityID	Class Service	Frequency ERP	Status DA?	City HAAT	State RCAMSL	Country RCAGL	File Number
Latitude	Longitude			ASRN	Dist (km)	Dist (mi)	Azimuth	
Licensee/Permittee								
KZMX-FM	242 A	FM	96.3 MHz	INVOL	HOT SPRINGS	SD	US	
-	46712		1.4 kW		135. m	1283. m	12. m	
N 43 26	34.00	W 103 27	27.00	-		102.76 km	63.85 mi	162.75°
MT. RUSHMORE BROADCASTING, INC.								
Section 73.207 Requirement: 95 km					7.76 km CLEAR			
NOTE: Added Listing to reflect proposed involuntary displacement of KZMX-FM								
KLGT	243 C1	FM	96.5 MHz	LIC	BUFFALO	WY	US	BLH-20120106AAJ
-	12698		100. kW		101.4 m	1697. m	140. m	
N 44 34	31.90	W 106 52	21.70	1236144		243.38 km	151.23 mi	277.62°
LEGEND COMMUNICATIONS OF WYOMING, LLC								
Section 73.207 Requirement: 209 km					34.38 km CLEAR			
KZMX-FM	244 A	FM	96.7 MHz	LIC	HOT SPRINGS	SD	US	BMLH-19901010KC
-	46712		1.4 kW		135. m	1283. m	12. m	
N 43 26	34.00	W 103 27	27.00	-		102.76 km	63.85 mi	162.75°
MT. RUSHMORE BROADCASTING, INC.								
Section 73.207 Requirement: 226 km					-123.24 km SHORT			
NOTE: KZMX-FM is being involuntarily displaced to 242A by this application.								
KRNK	244 C2	FM	96.7 MHz	LIC	CASPER	WY	US	BLH-20110804ABG
-	7360		2.7 kW		554. m	2524. m	79. m	
N 42 44	37.00	W 106 18	24.00	1033353		266.16 km	165.38 mi	229.40°
TOWNSQUARE MEDIA CASPER LICENSE, LLC								
Section 73.207 Requirement: 249 km					17.16 km CLEAR			
KAML-FM	247 C0	FM	97.3 MHz	LIC	GILLETTE	WY	US	BLH-20081002ADT
-	24211		100. kW		334.7 m	1761. m	335.4 m	
N 43 59	57.00	W 105 15	15.00	1257220		119.20 km	74.07 mi	252.68°
LEGEND COMMUNICATIONS OF WYOMING, LLC								
Section 73.207 Requirement: 105 km					14.20 km CLEAR			

Study Complete

SECTION 73.207 SEPARATION STUDY**PROJECT: KZMX-FM, HOT SPRINGS, SD, 242A FROM LICENSED SITE****STUDY COORDINATES: N 43-26-34.0; W 103-27-27.0 (N D-M-S; W D-M-S)**

Call Docket	Channel FacilityID	Class Service	Frequency ERP	Status DA?	City HAAT	State RCAMSL	Country RCAGL	File Number
Latitude	Longitude			ASRN	Dist (km)	Dist (mi)	Azimuth	
Licensee/Permittee								

KZZI 240 C FM 95.9 MHz LIC BELLE FOURCHE SD US BLH-20000112ABG
 - 38630 100. kW 545. m 2262. m 139. m
 N 44 19 35.00 W 103 50 6.00 1203805 102.76 km 63.85 mi 343.02°
 WESTERN SOUTH DAKOTA BROADCASTING, LLC
Section 73.207 Requirement: 95 km 7.76 km CLEAR

- 242 A FA 96.3 MHz USE LUSK WY US ---
 - - kW - m - m - m
 N 42 44 43.00 W 104 31 16.00 - 116.20 km 72.21 mi 228.44°
 -
Section 73.207 Requirement: 115 km 1.20 km CLEAR

KZMX-FM 244 A FM 96.7 MHz LIC HOT SPRINGS SD US BMLH-19901010KC
 - 46712 1.4 kW 135. m 1283. m 12. m
 N 43 26 34.00 W 103 27 27.00 - 0.00 km 0.00 mi 0.00°
 MT. RUSHMORE BROADCASTING, INC.
Section 73.207 Requirement: 31 km -31.00 km SHORT
NOTE: Facility being involuntarily displaced.

244 C FA 96.7 MHz PROP LEAD SD US ---
 - kW - m - m - m
 N 44 19 35.00 W 103 50 06.00 - 102.76 km 63.85 mi 343.02° -
Section 73.207 Requirement: 95 km 7.76 km CLEAR
NOTE: Facility of this application (See Table 1)

Study Complete