

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	Class	Service	Frequency	Status	City	State	Country	File Number	
Latitude	Longitude	ERP	DA?	ASRN	HAAT	RCAMSL	RCAGL	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	Class	Service	Frequency	Status	City	State	Country	File Number
	FacilityID		ERP	DA?	HAAT	RCAMSL	RCAGL		
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