

**RECORDING NW
KOUV-LP 107.9 FM VANCOUVER, WASHINGTON
FAC ID NO. 196567**

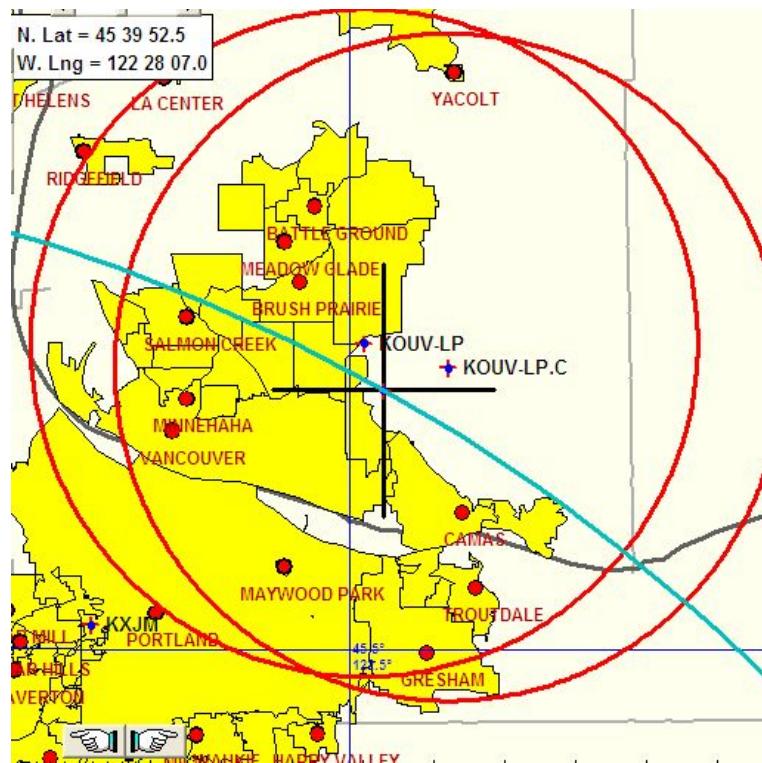
MINOR MODIFICATION OF CP

Channel 300
New Location: 45° 39' 51.9" N 122° 28' 11.3" W-- NAD 83
45° 39' 52.2" N 122° 28' 07.0" W -- NAD 27
Antenna AGL 14 m (mounted on existing support structure; antenna-sharing structure)
Tower Total 16 m
Antenna Ground 81 m
Antenna COR 95 m
HAAT -44 m
Power 50 w

Recording Nw

REFERENCE		CLASS = L1			DISPLAY DATES		
45 39 52.5 N.	45 39 52.5 N.	122 28 07.0 W.	122 28 07.0 W.	Current	Spacings to 2nd Adj.	DATA 07-17-18	SEARCH 07-17-18
----- Channel 300 - 107.9 MHz -----							
Call	Channel	Location	Azi	Dist	FCC	Margin	
*KXJM	LIC	298C0 Banks	OR	231.4	26.41	83.5	-57.1
KOUV-LP	LIC	300L1 Vancouver	WA	337.1	3.60	23.5	-19.9
KOUV-LP	CP	300L1 Vancouver	WA	70.4	4.80	23.5	-18.7
KHPE	LIC	300C Albany	OR	209.3	129.53	129.5	0.03

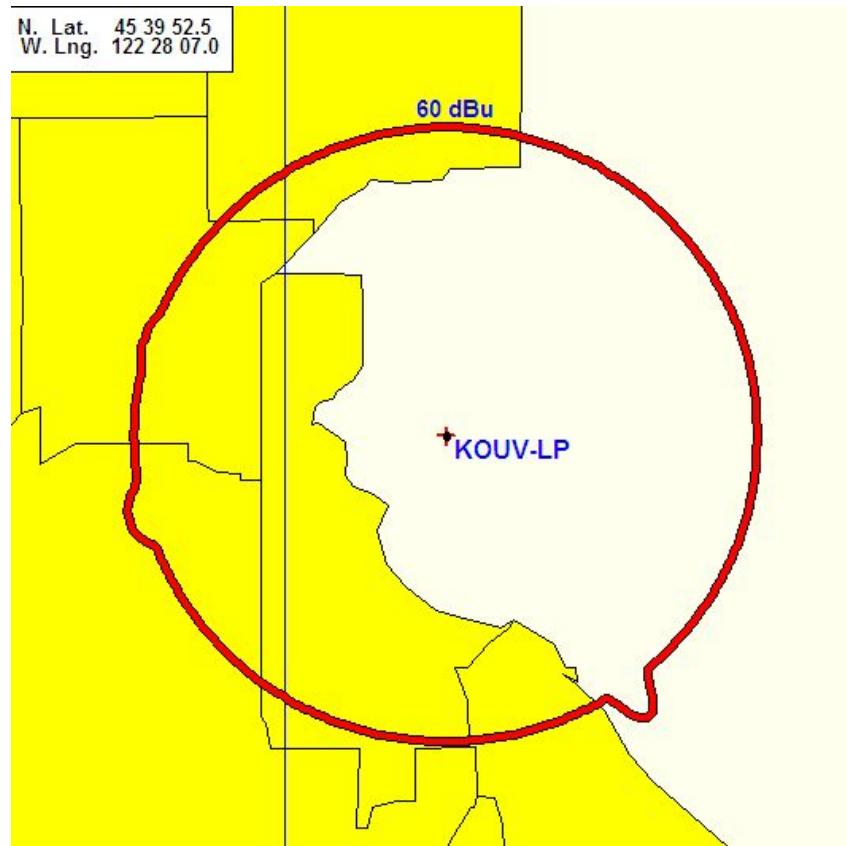
Reference station has protected zone issue: Canada							
All separation margins include rounding							
*See Second Adjacent Waiver							



Minor Change Move

Facility proposes 3.6 km move from licensed facility.

60 dBu FCC Contour



TOWAIR (PASS)

Second Adjacent Waiver Request

License respectfully requests a "second adjacent channel waiver" with regards to Section 47 C.F.R. Section 73.807 of the FCC rules based upon the "Living Way" precedence (Living Way Ministries, Inc., Memorandum Opinion and Order, 17 FCC Red 17054, 17056, ¶ 5 (2002), recon. denied 23 FCC Red 15070 (2008)). This will be accomplished by used Free Space methodology of calculation.

Using U/D methodology, at the proposed KOUV-LP transmitter location KXJM has a signal strength of 87.1 dBu. Interference will occur when the signal strength interfering signal exceeds the desired signal by 40 dbu. So the area of predicted interference would then be bounded by the 114 dBu contour.

The distance to this contour, using free space method:

$$D = (7.01 * P^{1/2}) / E,$$

where P is power (watts), E is field strength (v/m), and D is distance to contour (meters):

$$P = 50 \text{ w}, E = 127.1 \text{ dBu} \quad D = 22 \text{ meters}$$

However, the field strength of the proposed LPFM's antenna system falls quickly at depression angles below the horizon. Using elevation pattern data provided by Scala for a vertical dipole antenna (Model FMVP - <https://www.kathreinusa.com/patterns/product-number-fmvmp/>), the distance to the 127.1 dBu contour at various depression angles is tabulated below. The data shows that the lowest point at which the signal strength rises to 127.1 dBu is 9.1 meters below the center of radiation of the antenna system, or 3.9 meter above the ground. There are only some signal story buildings within the proximity of the private-property automotive salvage yard for with the antenna is co-located. Therefore, this is sufficient clearance, and the interference area encompasses zero population. The table below show that the lowest elevation point of the 127.1 dBu F(50,10) interfering contour is 3.9 meters above the roof.

Due to zero population within this radiation radius, this meets the "Living Way" Criteria to qualify for a Waiver of 47 C.F.R. Section 73.807.

Thus, the applicant requests second adjacent waiver based upon evidence no interference is proposed.

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- A MAX ERP
 - B DEPRESSION ANGLE
 - C RELATIVE FIELD
 - D dB FROM RELATIVE
 - E ERP
 - F ANGULAR DISTANCE TO 127.1 dBu CONTOUR

G VERTICAL DISTANCE (below antenna)

H HORIZONTAL DISTANCE TO 127.1 dBu CONTOUR

I CLEARANCE OF CONTOUR ABOVE GROUND

A	B	C	D	E	F	G	H	I
50	-90	0.025	-31.890	0.03	0.5	0.4	0	12.6
50	-89	0.017	-35.560	0.01	0.3	0.2	0	12.8
50	-88	0.01	-40.000	0.01	0.2	0.1	0	12.9
50	-87	0.01	-40.000	0.01	0.2	0.1	0	12.9
50	-86	0.01	-39.940	0.01	0.2	0.1	0	12.9
50	-85	0.019	-34.300	0.02	0.4	0.3	0	12.7
50	-84	0.028	-30.910	0.04	0.6	0.5	0	12.5
50	-83	0.038	-28.420	0.07	0.8	0.7	0	12.3
50	-82	0.047	-26.480	0.11	1	0.9	0.1	12.1
50	-81	0.057	-24.860	0.16	1.2	1.1	0.1	11.9
50	-80	0.067	-23.490	0.22	1.4	1.3	0.2	11.7
50	-79	0.077	-22.270	0.30	1.6	1.5	0.3	11.5
50	-78	0.087	-21.200	0.38	1.9	1.8	0.3	11.2
50	-77	0.098	-20.210	0.48	2.1	2	0.4	11
50	-76	0.108	-19.330	0.58	2.3	2.2	0.5	10.8
50	-75	0.119	-18.490	0.71	2.6	2.5	0.6	10.5
50	-74	0.13	-17.730	0.84	2.8	2.6	0.7	10.4
50	-73	0.141	-17.010	1.00	3	2.8	0.8	10.2
50	-72	0.152	-16.340	1.16	3.3	3.1	1	9.9
50	-71	0.164	-15.690	1.35	3.5	3.3	1.1	9.7
50	-70	0.176	-15.08	1.55	3.8	3.5	1.3	9.5
50	-69	0.188	-14.5	1.77	4.1	3.8	1.4	9.2
50	-68	0.201	-13.95	2.01	4.3	3.9	1.6	9.1
50	-67	0.214	-13.41	2.28	4.6	4.2	1.7	8.8
50	-66	0.226	-12.9	2.56	4.9	4.4	1.9	8.6
50	-65	0.24	-12.4	2.88	5.2	4.7	2.2	8.3
50	-64	0.254	-11.92	3.21	5.5	4.9	2.4	8.1
50	-63	0.268	-11.45	3.58	5.8	5.1	2.6	7.9
50	-62	0.282	-11.01	3.96	6.1	5.3	2.8	7.7

50	-61	0.296	-10.57	4.39	6.4	5.5	3.1	7.5
50	-60	0.31	-10.16	4.82	6.7	5.8	3.3	7.2
50	-59	0.326	-9.75	5.30	7.1	6	3.6	7
50	-58	0.341	-9.35	5.81	7.4	6.2	3.9	6.8
50	-57	0.356	-8.96	6.35	7.8	6.5	4.2	6.5
50	-56	0.372	-8.59	6.92	8.1	6.7	4.5	6.3
50	-55	0.388	-8.22	7.53	8.4	6.8	4.8	6.2
50	-54	0.404	-7.87	8.17	8.8	7.1	5.1	5.9
50	-53	0.421	-7.52	8.85	9.2	7.3	5.5	5.7
50	-52	0.438	-7.18	9.57	9.5	7.4	5.8	5.6
50	-51	0.455	-6.85	10.33	9.9	7.6	6.2	5.4
50	-50	0.472	-6.53	11.12	10.3	7.8	6.6	5.2
50	-49	0.489	-6.22	11.94	10.6	7.9	6.9	5.1
50	-48	0.506	-5.92	12.79	11	8.1	7.3	4.9
50	-47	0.523	-5.63	13.68	11.4	8.3	7.7	4.7
50	-46	0.541	-5.34	14.62	11.8	8.4	8.2	4.6
50	-45	0.558	-5.07	15.56	12.2	8.6	8.6	4.4
50	-44	0.575	-4.8	16.56	12.5	8.6	8.9	4.4
50	-43	0.593	-4.54	17.58	12.9	8.7	9.4	4.3
50	-42	0.61	-4.29	18.62	13.3	8.8	9.8	4.2
50	-41	0.628	-4.05	19.68	13.7	8.9	10.3	4.1
50	-40	0.645	-3.81	20.80	14.1	9	10.8	4
50	-39	0.662	-3.59	21.88	14.4	9	11.1	4
50	-38	0.678	-3.37	23.01	14.8	9.1	11.6	3.9
50	-37	0.695	-3.16	24.15	15.2	9.1	12.1	3.9
50	-36	0.711	-2.96	25.29	15.5	9.1	12.5	3.9
50	-35	0.727	-2.77	26.42	15.9	9.1	13	3.9
50	-34	0.743	-2.58	27.60	16.2	9	13.4	4
50	-33	0.758	-2.4	28.77	16.6	9	13.9	4
50	-32	0.774	-2.23	29.92	16.9	8.9	14.3	4.1
50	-31	0.788	-2.07	31.04	17.2	8.8	14.7	4.2
50	-30	0.803	-1.91	32.21	17.5	8.7	15.1	4.3
50	-29	0.816	-1.76	33.34	17.8	8.6	15.5	4.4
50	-28	0.83	-1.62	34.43	18.1	8.4	15.9	4.6

50	-27	0.842	-1.49	35.48	18.4	8.3	16.3	4.7
50	-26	0.855	-1.36	36.56	18.7	8.1	16.8	4.9
50	-25	0.867	-1.24	37.58	18.9	7.9	17.1	5.1
50	-24	0.878	-1.13	38.55	19.2	7.8	17.5	5.2
50	-23	0.889	-1.02	39.53	19.4	7.5	17.8	5.5
50	-22	0.899	-0.92	40.45	19.6	7.3	18.1	5.7
50	-21	0.909	-0.83	41.30	19.8	7	18.4	6
50	-20	0.918	-0.74	42.17	20.1	6.8	18.8	6.2
50	-19	0.927	-0.66	42.95	20.2	6.5	19.1	6.5
50	-18	0.935	-0.58	43.75	20.4	6.3	19.4	6.7
50	-17	0.942	-0.51	44.46	20.6	6	19.7	7
50	-16	0.95	-0.45	45.08	20.7	5.7	19.8	7.3
50	-15	0.956	-0.39	45.71	20.9	5.4	20.1	7.6
50	-14	0.962	-0.34	46.23	21	5	20.3	8
50	-13	0.967	-0.29	46.77	21.1	4.7	20.5	8.3
50	-12	0.973	-0.24	47.31	21.2	4.4	20.7	8.6
50	-11	0.977	-0.2	47.75	21.3	4	20.9	9
50	-10	0.982	-0.16	48.19	21.4	3.7	21	9.3
50	-9	0.985	-0.13	48.53	21.5	3.3	21.2	9.7
50	-8	0.989	-0.1	48.86	21.6	3	21.3	10
50	-7	0.991	-0.08	49.09	21.6	2.6	21.4	10.4
50	-6	0.993	-0.06	49.31	21.7	2.2	21.5	10.8
50	-5	0.995	-0.04	49.54	21.7	-1.8	21.6	14.8
50	-4	0.997	-0.03	49.66	21.8	-1.5	21.7	14.5
50	-3	0.998	-0.02	49.77	21.8	-1.1	21.7	14.1
50	-2	0.999	-0.01	49.89	21.8	-0.7	21.7	13.7
50	-1	0.999	0	50.00	21.8	-0.3	21.7	13.3
50	0	1	0	50.00	21.8	0	21.8	13
50	1	0.999	0	50.00	21.8	0.3	21.7	12.7
50	2	0.999	-0.01	49.89	21.8	0.7	21.7	12.3
50	3	0.998	-0.02	49.77	21.8	1.1	21.7	11.9
50	4	0.997	-0.03	49.66	21.8	1.5	21.7	11.5
50	5	0.995	-0.04	49.54	21.7	1.8	21.6	11.2
50	6	0.993	-0.06	49.31	21.7	2.2	21.5	10.8

50	7	0.991	-0.08	49.09	21.6	2.6	21.4	10.4
50	8	0.989	-0.1	48.86	21.6	3	21.3	10
50	9	0.985	-0.13	48.53	21.5	3.3	21.2	9.7
50	10	0.982	-0.16	48.19	21.4	3.7	21	9.3
50	11	0.977	-0.2	47.75	21.3	4	20.9	9
50	12	0.973	-0.24	47.31	21.2	4.4	20.7	8.6
50	13	0.967	-0.29	46.77	21.1	4.7	20.5	8.3
50	14	0.962	-0.34	46.23	21	5	20.3	8
50	15	0.956	-0.39	45.71	20.9	5.4	20.1	7.6
50	16	0.95	-0.45	45.08	20.7	5.7	19.8	7.3
50	17	0.942	-0.51	44.46	20.6	6	19.7	7
50	18	0.935	-0.58	43.75	20.4	6.3	19.4	6.7
50	19	0.927	-0.66	42.95	20.2	6.5	19.1	6.5
50	20	0.918	-0.74	42.17	20.1	6.8	18.8	6.2
50	21	0.909	-0.83	41.30	19.8	7	18.4	6
50	22	0.899	-0.92	40.45	19.6	7.3	18.1	5.7
50	23	0.889	-1.02	39.53	19.4	7.5	17.8	5.5
50	24	0.878	-1.13	38.55	19.2	7.8	17.5	5.2
50	25	0.867	-1.24	37.58	18.9	7.9	17.1	5.1
50	26	0.855	-1.36	36.56	18.7	8.1	16.8	4.9
50	27	0.842	-1.49	35.48	18.4	8.3	16.3	4.7
50	28	0.83	-1.62	34.43	18.1	8.4	15.9	4.6
50	29	0.816	-1.76	33.34	17.8	8.6	15.5	4.4
50	30	0.803	-1.91	32.21	17.5	8.7	15.1	4.3
50	31	0.788	-2.07	31.04	17.2	8.8	14.7	4.2
50	32	0.774	-2.23	29.92	16.9	8.9	14.3	4.1
50	33	0.758	-2.4	28.77	16.6	9	13.9	4
50	34	0.743	-2.58	27.60	16.2	9	13.4	4
50	35	0.727	-2.77	26.42	15.9	9.1	13	3.9
50	36	0.711	-2.96	25.29	15.5	9.1	12.5	3.9
50	37	0.695	-3.16	24.15	15.2	9.1	12.1	3.9
50	38	0.678	-3.37	23.01	14.8	9.1	11.6	3.9
50	39	0.662	-3.59	21.88	14.4	9	11.1	4
50	40	0.645	-3.81	20.80	14.1	9	10.8	4

50	41	0.628	-4.05	19.68	13.7	8.9	10.3	4.1
50	42	0.61	-4.29	18.62	13.3	8.8	9.8	4.2
50	43	0.593	-4.54	17.58	12.9	8.7	9.4	4.3
50	44	0.575	-4.8	16.56	12.5	8.6	8.9	4.4
50	45	0.558	-5.07	15.56	12.2	8.6	8.6	4.4
50	46	0.541	-5.34	14.62	11.8	8.4	8.2	4.6
50	47	0.523	-5.63	13.68	11.4	8.3	7.7	4.7
50	48	0.506	-5.92	12.79	11	8.1	7.3	4.9
50	49	0.489	-6.22	11.94	10.6	7.9	6.9	5.1
50	50	0.472	-6.53	11.12	10.3	7.8	6.6	5.2
50	51	0.455	-6.85	10.33	9.9	7.6	6.2	5.4
50	52	0.438	-7.18	9.57	9.5	7.4	5.8	5.6
50	53	0.421	-7.52	8.85	9.2	7.3	5.5	5.7
50	54	0.404	-7.87	8.17	8.8	7.1	5.1	5.9
50	55	0.388	-8.22	7.53	8.4	6.8	4.8	6.2
50	56	0.372	-8.59	6.92	8.1	6.7	4.5	6.3
50	57	0.356	-8.96	6.35	7.8	6.5	4.2	6.5
50	58	0.341	-9.35	5.81	7.4	6.2	3.9	6.8
50	59	0.326	-9.75	5.30	7.1	6	3.6	7
50	60	0.31	-10.16	4.82	6.7	5.8	3.3	7.2
50	61	0.296	-10.57	4.39	6.4	5.5	3.1	7.5
50	62	0.282	-11.01	3.96	6.1	5.3	2.8	7.7
50	63	0.268	-11.45	3.58	5.8	5.1	2.6	7.9
50	64	0.254	-11.92	3.21	5.5	4.9	2.4	8.1
50	65	0.24	-12.4	2.88	5.2	4.7	2.2	8.3
50	66	0.226	-12.9	2.56	4.9	4.4	1.9	8.6
50	67	0.214	-13.41	2.28	4.6	4.2	1.7	8.8
50	68	0.201	-13.95	2.01	4.3	3.9	1.6	9.1
50	69	0.188	-14.5	1.77	4.1	3.8	1.4	9.2
50	70	0.176	-15.08	1.55	3.8	3.5	1.3	9.5
50	71	0.164	-15.69	1.35	3.5	3.3	1.1	9.7
50	72	0.152	-16.34	1.16	3.3	3.1	1	9.9
50	73	0.141	-17.01	1.00	3	2.8	0.8	10.2
50	74	0.13	-17.73	0.84	2.8	2.6	0.7	10.4

50	75	0.119	-18.49	0.71	2.6	2.5	0.6	10.5
50	76	0.108	-19.33	0.58	2.3	2.2	0.5	10.8
50	77	0.098	-20.21	0.48	2.1	2	0.4	11
50	78	0.087	-21.2	0.38	1.9	1.8	0.3	11.2
50	79	0.077	-22.27	0.30	1.6	1.5	0.3	11.5
50	80	0.067	-23.49	0.22	1.4	1.3	0.2	11.7
50	81	0.057	-24.86	0.16	1.2	1.1	0.1	11.9
50	82	0.047	-26.48	0.11	1	0.9	0.1	12.1
50	83	0.038	-28.42	0.07	0.8	0.7	0	12.3
50	84	0.028	-30.91	0.04	0.6	0.5	0	12.5
50	85	0.019	-34.3	0.02	0.4	0.3	0	12.7
50	86	0.01	-39.94	0.01	0.2	0.1	0	12.9
50	87	0.01	-40	0.01	0.2	0.1	0	12.9
50	88	0.01	-40	0.01	0.2	0.1	0	12.9
50	89	0.017	-35.56	0.01	0.3	0.2	0	12.8
50	90	0.025	-31.89	0.03	0.5	0.4	0	12.6