

## **Exhibit 17 - KCFL Request to Move to Non-Adjacent FM Channel as a Non-Major Facility Change**

To take advantage of an improved transmitter site would require KCFL to change from Channel 217A to non-adjacent channel 208A. A meaningful coverage increase on licensed Channel 217A is not possible because interference would be created with co-channel KACW, 217A South Bend, WA as well as first adjacent KGHI, 216A at Westport, WA as shown in Figure 17A.

Therefore, operation at the proposed site would not be allowed on 217A, KCFL's currently licensed channel.

However, if KCFL were allowed to move to Channel 208A as detailed in the instant proposal, there would be no interference given to or received from any other station. There would be a non-interfering close approach of contours with co-channel KNHC, Seattle as shown in Exhibit 18.

Coverage would continue to Elma, WA, the current Community of License.

The instant proposal would increase estimated 60 dBu population coverage from the current 5,947 to 18,523. Service would also be added to the cities of Montesano and Cosmopolis.

60 dBu coverage would increase from the current 100 sq km to approximately 545 sq km.

The Community of License would continue to be Elma, WA.

We ask that this application be considered a non-major facility change under: **Part 73.3573 (a) (1)**

**(iv) a channel substitution, subject to the provisions of Section 316 of the Communications Act for involuntary channel substitutions.**

**In the case of a Class D or an NCE FM reserved band channel station, a major facility change is any change in antenna location which would not continue to provide a 1 mV/m service to some portion of its previously authorized 1 mV/m service area. In the case of a Class D station, a major facility change is any change in community of license or any change in frequency other than to a first-, second, or third adjacent channel.**

We infer that the specific reference to a Class D station, where "**any change in frequency other than to a first-, second, or third adjacent channel**" would only be a major facility change for a Class D station., and not an NCE FM. Since the instant application is for a Class A NCE FM station, this would appear not to be a major facility change under this definition.

We therefore request that KCFL be allowed to move from Channel 217A to non-adjacent Channel 208A to permit a signal upgrade in a similar fashion to what is currently allowed for Non-reserved band FM stations.

We further request that the instant application be considered a standard Form 340 Application without the requirement for a petition in a manner similar to the process available to Non-reserved FM stations using FCC Form 301.