



PO Box 391  
Twin Falls, ID 83303

**KWCF SHERIDAN                      APRIL 2007**

**Request for Waiver of 47 C.F.R. Section 73.509**

CSN International (“CSN”) desires to increase the service area of KWCF, Sheridan, which is a fully licensed FM station under **bled-20051212ACJ**. CSN is seeking a grant of this minor modification and waiver request, which will better serve the growing demand of the public interest of Sheridan, WY and will place the 60 dBu F(50,50) Contour of this FM Station back within its City of License community. This proposal is engineered so as to **NOT CAUSE** interference to any existing station, known application or allocation. However, the proposed increased service area would **RECEIVE** interference from two existing adjacent full power FM stations, as follows:

Facility ID	Licensed File #	Call Sign	City of License	Related Attached Exhibit
89342	BLED-20051206AGL	KOHR	Sheridan	EX16, (a) – 2 <sup>nd</sup> Adjacent
91354	BPED-19980810MD	KSHW.C	Sheridan	EX16, (b) – 3 <sup>rd</sup> Adjacent

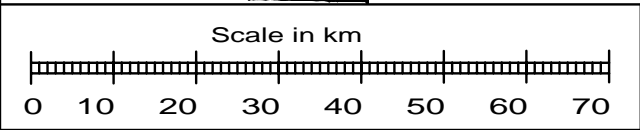
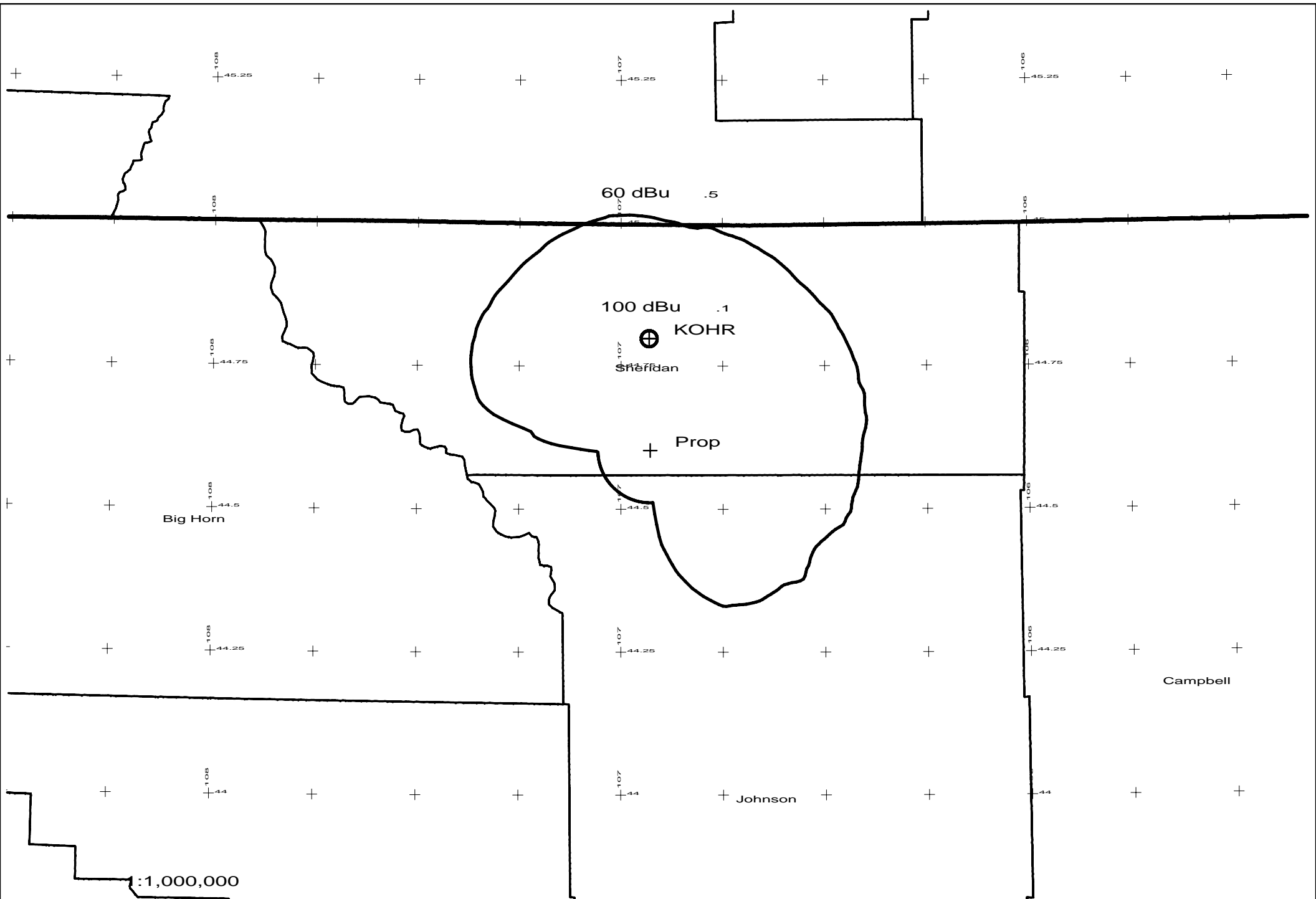
This proposal will not cause interference to the above referenced FM stations as the 100 dBu F(50,10) interfering contour of KWCF will not overlap either stations’ 60 dBu F(50,50) protected contour. However, KWCF’s proposed protected 60 dBu F(50,50) would receive prohibited overlap from both KOHR and KSHW.CP. The area of overlap received from the above referenced facilities will be approximately:

Call Sign	Sq. km	Total area of KWCF’s proposed 60 dBu
KOHR	5.13	.135 %
KSHW.C	4.88	.128 %

Presently the current 60 dBu F(50,50) contour of KWCF contains 2376.38 sq. km and the grant of this waiver request will allow KWCF to increase its overall coverage area to 3801.24 sq. km, which

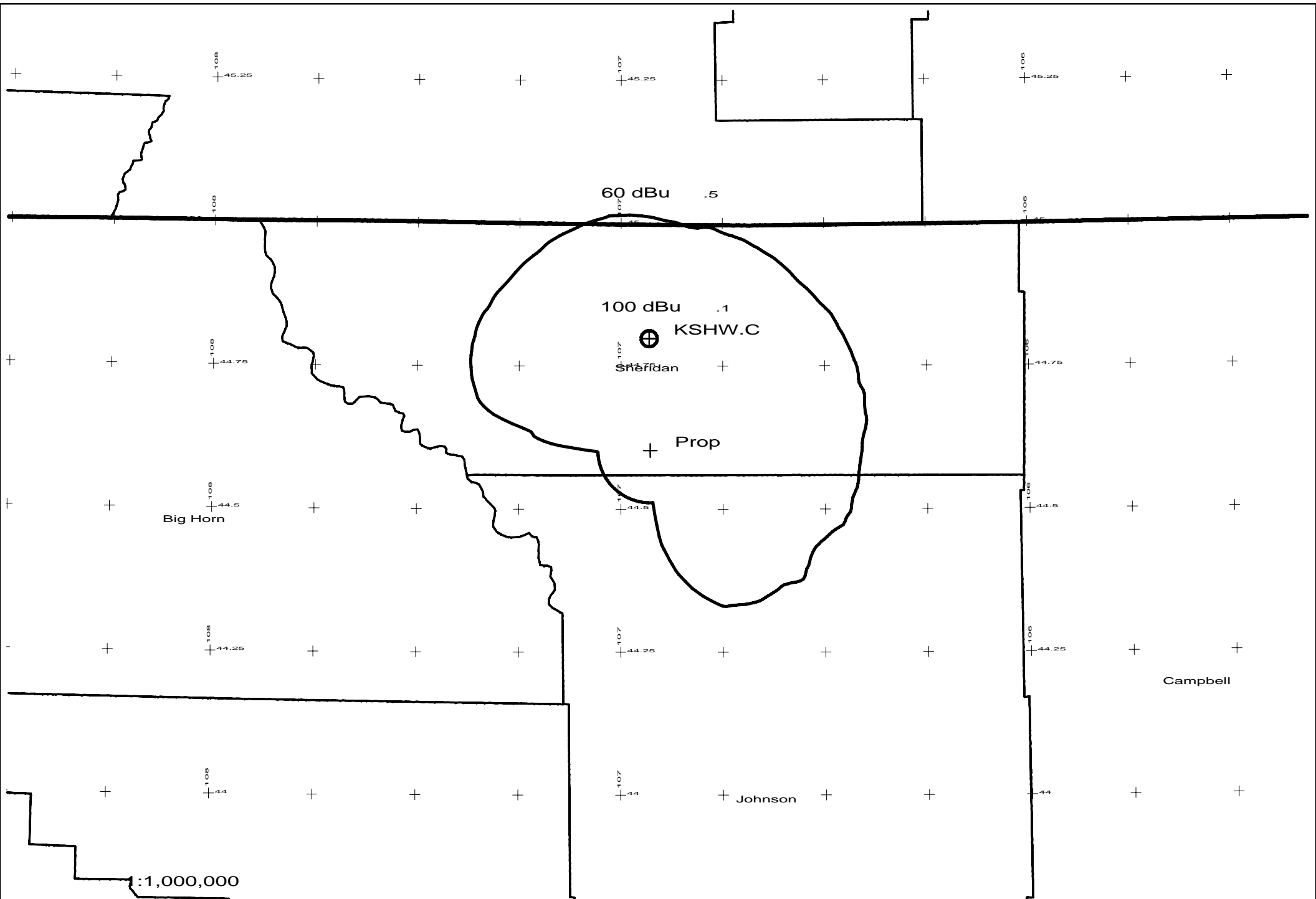
is an increase of 37.5%. Presently KWCF provides service to an estimated 12255 persons and this proposal will provide service to an estimated 27364 persons. This reflects an estimated increase of 15109 more persons, an increase of 123.29%. This waiver request is similar to the request made by the licensee of WCPE(FM) in Educational Information Corporation,<sup>6</sup> FCC Red 2207 (1991). WCPE(FM) requested a waiver in its application to permit de minimus overlap “received” and in the same proceeding WCCE(FM) requested a waiver in its applications to permit de minimus overlap “caused”. Please note that CSN is not requesting overlap “caused”, **ONLY** overlap “received”. More recently the Commission granted this type of a waiver to Educational Media Foundation in its minor change application of KYLV, Oklahoma City, OK BPED-20040210AAQ, to CSN International in its minor change applications of KJCH Coos Bay, OR BPED-20050603AAC and more recently WYJC St. Marks, FL BPED-20070108ACC.

Because the Commission has recognized the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, CSN International believes that its instant request for KWCF, Sheridan, Wyoming fully satisfies the criteria established by the Commission for a waiver of Section 73.509 of the rules as it pertains to overlap received. Clearly, this benefit heavily outweighs the potential for interference in an area that would be a total of only around **1.23%** of KWCF’s proposed service area. Accordingly CSN International respectfully submits its requested waiver of Section 73.509(a) of the Commissions rules is justified in this instance.



Prop 207C3 1kW 1920M AMSL  
N. Lat. 44 36 10 W. Lng. 106 55 42

Sheridan EX 16(a)  
CSN - 04/07



Prop 207C3 1kW 1920M AMSL  
N. Lat. 44 36 10 W. Lng. 106 55 42

Sheridan EX 16(b)  
CSN - 04/07