

Engineering Statement Regarding Second &/or Third Adjacent Channel Interference

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

In this case, K235BT is thus affected. In this case, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

K235BT has a signal in the area of the proposed FMT of 102.7 dBu. Thus using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules, the proposed 142.7 dBu interference contour would be the area of possible interference. That area extends 7.5 meters from the proposed FMT site, and that area is fenced off, unpopulated and uninhabited. The only building or structure within that area is the transmitter and equipment building, which is uninhabited.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed area of interference is uninhabited and/or unpopulated and thus will there not cause any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of undesirable to desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Educational Communications Of Colorado Springs, Inc.

K237CY to Fill-In Translator

REFERENCE CH# 237D - 95.3 MHz, Pwr= 0.215 kW, HAAT= 0.0 M, COR= 2078 M
 40 29 36.0 N.
 105 10 52.0 W.
 Average Protected F(50-50)= 6.83 km
 Omni-directional

DISPLAY DATES
 DATA 05-15-10
 SEARCH 05-16-10

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT* (Overlap in km)
237D Ft. Collins	K237CY	LIC	DC_	0.0 0.0	0.0 BLFT20061016ADT	40 29 36.0 105 10 52.0	0.010	18.1 2078	4.6 Educational Communications	-40.8*<	-73.5*<
235D Masonville	K235BT	LIC	DV_	339.4 159.4	0.1 BLFT20090731AEP	40 29 38.0 105 10 53.0	0.065	0.1 2081	6.8 Mitchell A. Beranek	-12.2*<	-7.7*<
236C Laramie	KCGY	LIC	_CN	346.0 165.8	93.5 BLH19831107AS	41 18 34.0 105 27 11.0	100.000 326	86.5 2726	57.0 Gap Broadcasting Laramie L	-5.7*<	17.7
237D Denver	630298	APP	_C_	159.6 339.8	86.1 BNPFT20030317AZZ	39 45 59.0 104 49 48.0	0.001	8.3 1643	2.6 Horizon Christian Fellowship	50.9	2.0
239C0 Denver	KPTT	LIC	DCX	183.2 3.1	84.5 BLH20071003ACN	39 43 59.0 105 14 10.0	100.000 346	11.4 2256	80.2 Citicasters Licenses, Inc.	47.1	3.3
234C Lafayette	KRKS-FM	LIC	DCN	197.4 17.3	49.0 BMLH19981009KC	40 04 19.0 105 21 14.0	100.000 300	1.9 2442	36.1 Salem Media Of Colorado, I	22.3	11.9
238C2 Pine Bluffs	1364793	APP	NCX	42.5 223.0	101.8 BNPH20091019AEU	41 09 54.0 104 21 36.0	50.000 93	60.9 1768	36.9 United States Cp, LIC	12.6	20.9
238C2 Pine Bluffs	1364937	RSV	___	50.3 231.1	121.0	41 10 55.0 104 04 07.0	50.000 150	77.4 1736	51.6 United States Cp, LIC	15.1	25.1
236C Colorado Springs	KATC-FM	LIC	_C_	171.9 352.1	196.0 BLH20060622ABT	38 44 43.0 104 51 39.0	72.000 695	146.3 2946	100.8 Citadel Broadcasting Compa	22.3	52.6
238C3 Pine Bluffs	AU7955923	VAC	___	59.6 240.4	114.2 RM10098	41 00 23.0 104 00 34.0	25.000 100	59.3 1717	38.3 Kkdd-fm Broadcasters, Et A	26.2	31.1
238C3 Pine Bluffs	R13048	DEL	___	59.6 240.4	114.2	41 00 23.0 104 00 34.0	25.000 100	59.3 1717	38.3 Kimball Radio, LIC	26.2	31.1
238C3 Pine Bluffs	1334111	APP	___	59.6 240.4	114.2 BSFH20090625ADO	41 00 23.0 104 00 34.0	25.000 100	59.3 1717	38.3 United States Cp, LIC	26.2	31.1
237C1 Eckley	KECK	LIC	_CX	103.9 285.5	212.9 BLH20080229AAG	40 00 33.0 102 45 35.0	100.000 103	142.6 1391	46.3 Arnold Broadcasting, Inc.	41.7	81.4
234D Cheyenne	K234AH	LIC	_C_	11.0 191.1	68.7 BLFT20090723AGJ	41 06 02.0 105 01 29.0	0.092	0.7 2107	9.2 Mountain Community Transla	42.4	58.5

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
 Contour distances are on direct line to and from reference station. Reference zone = 2, Co to 3rd adjacent.
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
 "*"affixed to 'IN' or 'OUT' values = site inside protected contour.
 "<" = Contour Overlap

Contour.out

Terrain and Contour Study

N. Lat. = 40 29 36 W. Lng. = 105 10 52

HAAT and Distance to Contour - FCC Method - 03 Arc Sec.

20030312AEH

Azi .	AV EL	HAAT	ERP kW	dBk	Field	60-F5	100-F1
000	1739.7	338.3	0.0007	-31.26	0.273	4.63	0.06
030	1582.8	495.2	0.0065	-21.86	0.807	11.08	0.18
060	1551.3	526.7	0.0094	-20.25	0.971	12.59	0.22
090	1535.0	543.0	0.0036	-24.38	0.604	9.46	0.13
120	1566.6	511.4	0.0002	-36.12	0.156	3.18	0.03
150	1588.8	489.2	0.0003	-35.32	0.171	3.44	0.04
180	1625.8	452.2	0.0002	-36.34	0.152	3.07	0.03
210	1806.8	271.2	0.0002	-36.48	0.150	2.78	0.03
240	1961.3	116.7	0.0003	-34.59	0.186	2.50	0.04
270	2140.2	-62.2	0.0002	-37.87	0.128	1.61	0.03
300	1914.7	163.3	0.0003	-34.87	0.181	2.77	0.04
330	1884.0	194.0	0.0002	-36.59	0.148	2.56	0.03

Ave EI = 1741.42 M HAAT= 336.58 M AMSL= 2078

Educational Communications Of Colorado Springs, Inc.
K237CY to Fill-In Translator vs KCGY

FMCommander Single Allocation Study - 05-16-2010 - NGDC 30 SEC
K237CY's Overlaps (In= -5.69 km, Out= 17.65 km)

K237CY CH 237 D

Lat= 40 29 36.0, Lng= 105 10 52.0

0.215 kW 0 M HAAT, 2078 M COR

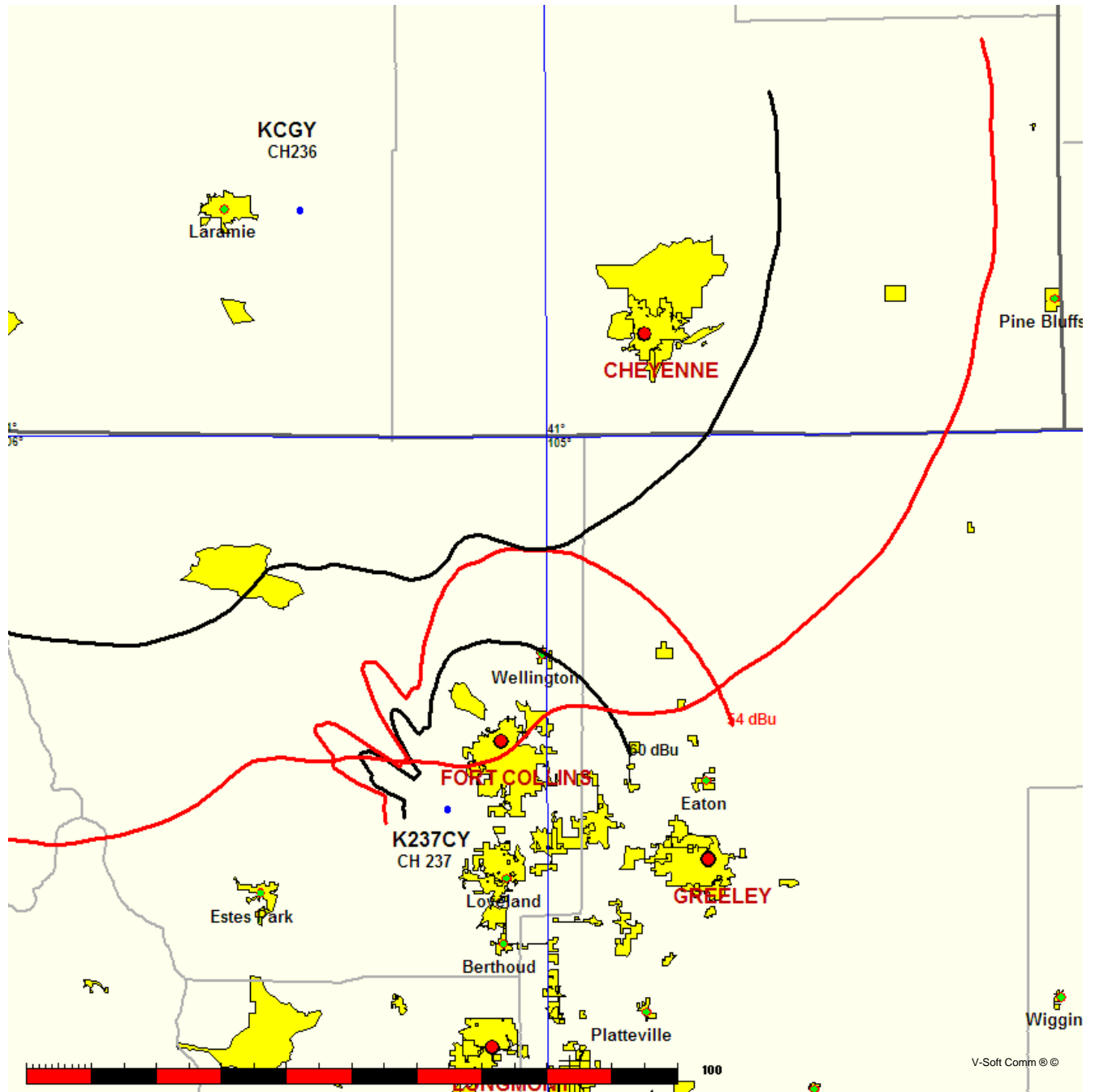
Prot.= 60 dBu, Intef.= 54 dBu

KCGY CH 236 C BLH19831107AS

Lat= 41 18 34.0, Lng= 105 27 11.0

100.0 kW 326 M HAAT, 2726 M COR

Prot.= 60 dBu, Intef.= 54 dBu



K237CY-KCGY-FMOver.txt

05-16-2010

NGDC 30 SEC Terrain Data

FMOver Analysis

KCGY BLH19831107AS

K237CY

Channel = 236C
 Max ERP = 100 kW
 RCAMSL = 2726 M
 N. Lat. 41 18 34.0
 W. Lng. 105 27 11.0
 Protected
 60 dBu

Channel = 237D
 Max ERP = 0.215 kW
 RCAMSL = 2078 M
 N. Lat. 40 29 36.0
 W. Lng. 105 10 52.0
 Interfering
 54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
130.0	100.0000	0243.8	067.7	031.3	000.2150	0494.8	055.3	49.55	
131.0	100.0000	0241.2	067.5	030.9	000.2150	0494.6	054.1	49.95	
132.0	100.0000	0237.9	067.2	030.4	000.2150	0494.3	053.0	50.35	
133.0	100.0000	0234.0	066.9	029.8	000.2150	0494.1	051.9	50.74	
134.0	100.0000	0229.8	066.5	029.1	000.2150	0493.8	050.9	51.12	
135.0	100.0000	0226.1	066.2	028.4	000.2150	0493.4	049.9	51.48	
136.0	100.0000	0223.1	065.9	027.7	000.2150	0492.8	048.8	51.84	
137.0	100.0000	0220.8	065.7	027.0	000.2150	0491.7	047.8	52.19	
138.0	100.0000	0219.1	065.6	026.3	000.2150	0490.2	046.8	52.53	
139.0	100.0000	0217.6	065.5	025.7	000.2150	0488.1	045.8	52.87	
140.0	100.0000	0216.0	065.3	024.9	000.2150	0485.3	044.8	53.18	
141.0	100.0000	0213.7	065.1	024.0	000.2150	0481.4	043.9	53.47	
142.0	100.0000	0209.9	064.7	022.9	000.2150	0476.3	043.1	53.69	
143.0	100.0000	0204.4	064.2	021.6	000.2150	0469.8	042.3	53.85	
144.0	100.0000	0197.3	063.5	020.0	000.2150	0461.9	041.8	53.92	
145.0	100.0000	0189.2	062.8	018.2	000.2150	0454.2	041.3	53.94	
146.0	100.0000	0180.2	061.9	016.4	000.2150	0448.8	041.0	53.96	
147.0	100.0000	0169.6	060.8	014.3	000.2150	0443.8	040.9	53.89	
148.0	100.0000	0158.4	059.5	012.0	000.2150	0431.1	041.0	53.53	
149.0	100.0000	0148.5	058.3	009.7	000.2150	0413.9	041.3	53.01	
150.0	100.0000	0140.6	057.2	007.7	000.2150	0396.2	041.5	52.47	
151.0	100.0000	0135.1	056.4	006.0	000.2150	0383.3	041.5	52.12	
152.0	100.0000	0131.9	056.0	004.5	000.2150	0377.3	041.3	52.03	
153.0	100.0000	0130.9	055.8	003.3	000.2150	0370.6	041.0	52.01	
154.0	100.0000	0131.5	055.9	002.1	000.2150	0359.2	040.4	51.93	
155.0	100.0000	0134.4	056.3	001.2	000.2150	0345.0	039.6	51.89	
156.0	100.0000	0138.9	057.0	000.3	000.2150	0331.7	038.6	51.95	
157.0	100.0000	0144.0	057.7	359.3	000.2150	0317.5	037.6	52.01	
158.0	100.0000	0148.2	058.2	358.2	000.2150	0298.2	036.7	51.86	
159.0	100.0000	0151.1	058.6	356.8	000.2150	0275.5	036.0	51.50	
160.0	100.0000	0152.3	058.8	355.3	000.2150	0244.8	035.5	50.71	

EXHIBIT 12b

Demonstration of No Population in 100 dBu Interference Contour

