

Section 74.1204 - Statement of Compliance
K293CJ-CP, Omaha, Nebraska
FCC File No. BMPFT-20160129AXR
FM Translator Facility ID. 156454
August, 2016

The Applicant proposes herein to modify the above-referenced, non-reserved band, FM translator authorization by means of a conventional minor change application. The K293CJ predicted 60 dBu F(50,50) contour coverage proposed herein largely replicates the 60 dBu coverage of the technical facility authorized in the outstanding construction permit and the tower location specified herein is only 1.43 kilometers from the tower site specified in the outstanding K293CJ construction permit (FCC File No. BMPFT-20160129AXR).¹

The relocation proposed herein became necessary because the authorized tower could not support the K293CJ antenna without substantial structural modifications. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent first-adjacent channel (See Exhibit 1) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel station KOPW(FM), Plattsmouth, NE (Channel 295C3) and third-adjacent channel station KKCD(FM), Omaha, NE (Channel 290C2) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

¹ The K293CJ, January, 2016, Modification of Construction Permit Application was granted in the First FM translator application modification filing window for AM stations to modify and/or relocate FM translator stations. See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015. The K293CJ site authorized in the January 2016 minor modification was 200.9 miles from the transmitter site authorized in the translator's outstanding Construction Permit (FCC File No. BNPFT-20130328ATN). The K293CJ site proposed herein is 200.8 miles from the transmitter site authorized in 2013. Therefore, this conventional minor modification application does not undermine the policy and procedures set forth in the above-referenced Public Notice.

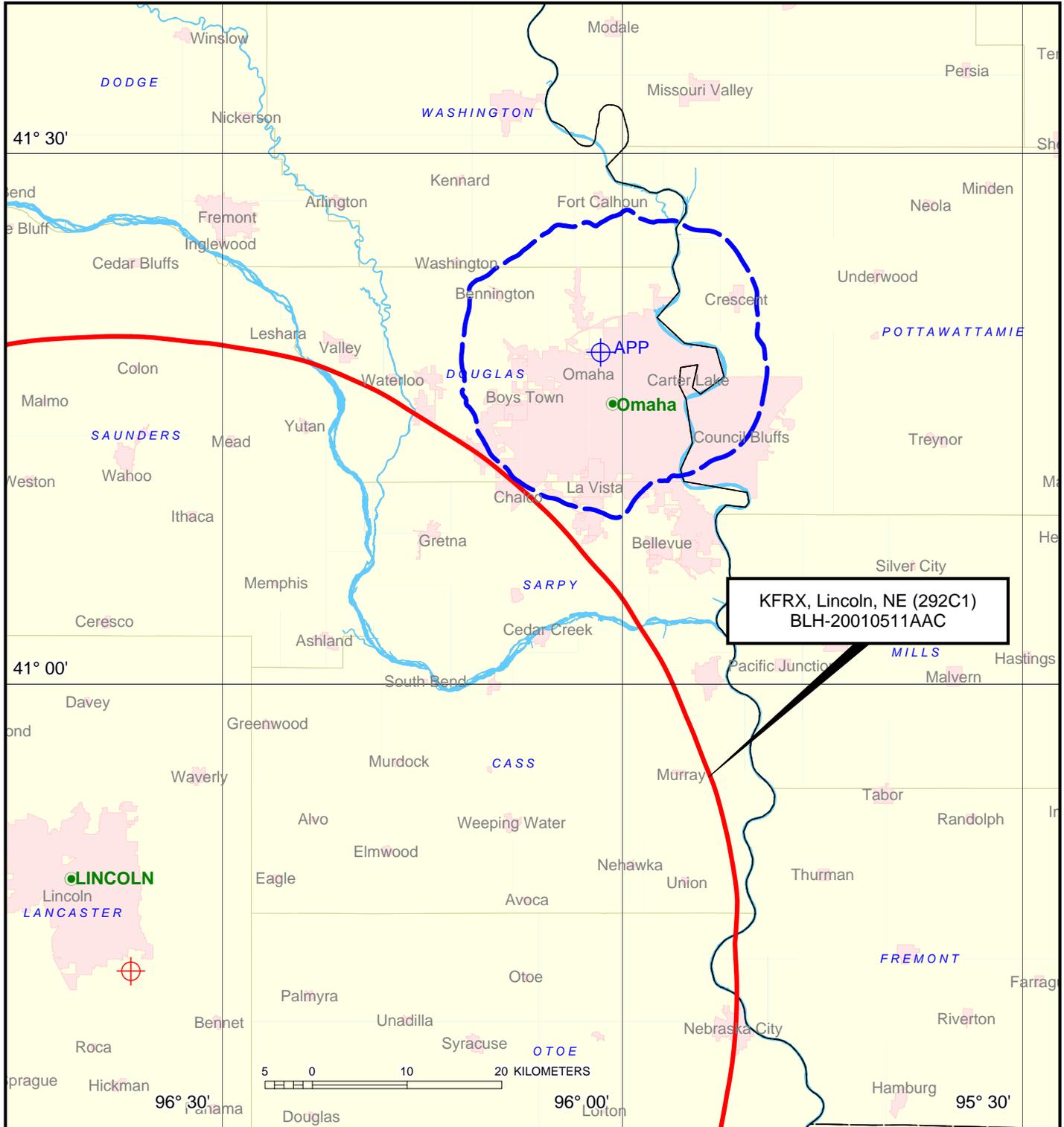
The proposed transmitting antenna will be located within the protected contour of second and third adjacent channel, full service stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, KKCD(FM) is predicted to produce an F(50,50) signal strength of 83 dBu while KOPW(FM) is predicted to produce an F(50,50) signal strength of only 69 dBu. Therefore, KOPW(FM) provides for a worst-case interference analysis.

In the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 109 dBu contour relative to KOPW(FM). According to free space calculations, the translator's worst-case 109 dBu interfering contour will extend, at most, 192 meters from the proposed transmitter site and interference is predicted to occur only at heights above ground level of 66 feet or higher (See the attached Table).

As shown on the attached aerial view map, only at-grade roadways, and low clearance buildings and residences are located in this vicinity. Therefore, the translator's worst-case interfering contour relative to KOPW(FM) not only remains well above ground level, but also does not impinge upon any buildings or major roads where there may be an affected population. Therefore, the proposed minor change will cause no interference to any population served by KOPW(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

First-Adjacent Channel FM Protected Contours: 60 dBu F(50,50) - Solid Contours
Proposed Translator Interfering Contour: 54 dBu F(50,10) - Dashed Contour



FIRST-ADJACENT CHANNEL SECTION 74.1204
CONTOUR OVERLAP STUDY
K293CJ, OMAHA, NE (FAC. ID 156454)
CP: CH. 293D, 110 watts (ND), 463 m RCAMSL
MOD: CH. 293D, 60 watts (ND), 486 m RCAMSL
AUGUST, 2016

There are no buildings, inhabitable space or major roadways above an elevation of 66 feet within the worst-case interference contour shown below.



KOPW, Plattsmouth, NE
Ch. 295C3, 25 kW ERP, 100 m HAAT
FCC File No. BLH-19990827AAA

Worst-Case Channel 293 Interfering Contour
to Second-Adjacent Channel Station KOPW
K293CJ-CP, Omaha, NE (Facility ID 93806)
APP: ERP: 60 watts (ND) , 122 m RCAGL
August, 2016