February 2011
LPFM Station KONR-LP
Anchorage, Alaska Channel 291L1
Allocation Study

LPFM station KONR-LP is presently licensed for operation on Channel 285L1 at Anchorage. Owing to the activation of station KMVV on Channel 285C1 in the vicinity of Anchorage, it is necessary for KONR-LP to secure authorization on a new channel in order to provide continued service to the public.

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class L1 stations as prescribed in §73.207 of the Commission's Rules, with the exception of short-spacings to the licensed facility of KNLT 289C1 Anchorage and the licensed facility of KWHL 293C1 Anchorage.[1]

The KONR-LP licensee has secured a letter from the KWHL licensee, consenting to grant of the instant application. That letter is included as an attachment to this application.

KNLT 289C1 Anchorage
The proposed LPFM operation will be short-spaced to second-adjacent channel station KNLT on Channel 289C1 at Anchorage. The proposed LPFM transmitter site is located within the 60 dBu protected contour of KNLT, 28.69 km from the KNLT transmitter site at a bearing of 222 degrees True. The 100 dBu interfering contour (i.e. the standard FM second-adjacent-channel interfering contour) from the proposed facility would extend 700 meters from the transmitter site.

However, given the KNLT antenna's 514 meter HAAT and 51 kW ERP along this radial, that station places an 83.6 dBu contour at the LPFM transmitter site. The corresponding interfering contour from the LPFM is 83.6 + 40 = 123.6 dBu, which (given the anticipated LPFM ERP of 100 watts) extends at most 46 meters from the LPFM transmitting antenna. The area within 46 meters of the tower site is commercial in nature, with primarily transient population.

KWHL 293C1 Anchorage
The proposed LPFM operation will be short-spaced to second-adjacent channel station KWHL on Channel 293C1 at Anchorage. The proposed LPFM transmitter site is located within the 60 dBu protected contour of KWHL, 3.11 km from the KWHL transmitter site at a bearing of 21 degrees True. The 100 dBu interfering contour (i.e. the standard FM second-adjacent-channel interfering contour) from the proposed facility would extend 700 meters from the transmitter site.

However, given the KWHL antenna's 83 meter HAAT and 100 kW ERP along this radial, that station places a 108.8 dBu contour at the LPFM transmitter site. The corresponding interfering

[1] An apparent short-spacing to application BMPFT-20100415ACB for modification of FM translator K292FY at Anchorage is being resolved by a simultaneous request by the K292FY permittee for that application to be dismissed.

contour from the LPFM is 108.8 + 40 = 148.8 dBu, which (given the anticipated LPFM ERP of 100 watts) extends at most 2.5 meters from the LPFM transmitting antenna and does not reach ground level.

Conclusion

Implementation of the KMVV modification (now licensed as BLH-20080304AAA) has resulted in the displacement of LPFM station KONR-LP. A comprehensive search of the FM band reveals that there is no alternate, fully-spaced, and rule-compliant channel available for the LPFM station.

Based on the preceding analysis, the proposed operation of KONR-LP is predicted to result in only *de minimis* interference to reception of KNLT and KWHL. To the extent necessary, waiver of §73.807 of the Commission's Rules is respectfully requested to allow KONR-LP to operate short-spaced to second-adjacent-channel stations KNLT and KWHL.

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SEARCH PARAMETERS FM Database Date: 110204

Channel: 291L1 106.1 MHz

Latitude: 61 8 48

Longitude: 149 52 28

Safety Zone: 32 km

Job Title: KONR-LP 291L1 ANCHORAGE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)		Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K238BE	ANCHORAGE		238D	0.075	DA	61-11-18	355.0	4.66	5
CP	AK	BNPFT-80616ADR	95.5	0.0		149-52-55		-0.34	SHORT
KNLT	ANCHORAGE		289C1	51.000		61-20-11	42.3	28.69	73
LIC	AK	BLH-10720ABJ	105.7	326.0		149-30-48		-44.31	SHORT
K292FY	ANCHORAGE		291D	0.020		61-12-36	27.0	7.92	0
APP	AK	BMPFT-00415ACB	106.1	0.0		149-48-27		0.00	TRANS
NOTE: TO BE DISMISSED PER APPLICANT'S REQUEST									
NEW-T	PALMER		291D	0.099	DA	61-28-21	46.7	53.29	39
APP	AK	BNPFT-30317JCQ	106.1	0.0		149-08-47		14.29	CLEAR
K292FY	EAGLE RIVER		292D	0.035	DA	61-20-12	42.3	28.74	28
CP	AK	BNPFT-80617ABW	106.3	0.0		149-30-45		0.74	CLEAR
KWHL	ANCHORAGE		293C1	100.000	DA	61-07-14	200.8	3.11	73
LIC	AK	BLH-00911AAO	106.5	20.0		149-53-42		-69.89	SHORT

44444 END OF FM SPACING STUDY FOR CHANNEL 291 44444