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KCAW, Sitka  
KFSK, Petersburg  
KRBD, Ketchikan  
KSTK, Wrangell  
KTOO, Juneau

Re: Construction Permits BXPB-20050503ABX and BPH-20050503ABY

Please consider this response to the Special Operating Conditions specified in the above referenced Construction Permits awarded to Rainbird Community Broadcasting, licensee for KRBD, Ketchikan, Alaska.

Special Operating Condition #2, BPH-20050503ABY, and #3, BXPB-20050503ABX, result from proposed changes to the KRBD main antenna, which is located within 0.8 kilometers of the non-directional AM antenna for KTKN, Ketchikan, Alaska. Because of the proximity to KTKN, KRBD's proposals are subject to the requirements of 47 CFR 73.1692.

We believe the Conditions are not applicable for the following reasons:

- ***The Proposed Changes are Insignificant.*** The KRBD antenna and tower were installed and licensed in 1984. Measurements made before and after the installation indicated no effect on the KTKN signal. KRBD presently proposes to change frequency and ERP, and license an Auxiliary Antenna. The corresponding physical change on the antenna tower would be to remove the four existing antenna elements and replace them with four similarly sized elements in exactly the same location (the main antenna would go from four to two elements; the second set of two elements would be the new Auxiliary). An second feedline would be added. Given the lack of impact by the original KRBD installation, and the similarity between the new antenna and old antenna, any change in the physical or electrical characteristics of the tower could be expected to be insignificant.
- ***The KRBD Facility is Distant from KTKN.*** Regulation 73.1692 is triggered when changes are proposed within 0.8 km of an AM antenna. KRBD's tower is located 0.76 km from the KTKN antenna. If the KRBD facility were located an additional four meters to the northwest of its present location, any proposed changes would be beyond the scope of 73.1692. The KRBD facility is 'barely over the line'. (The distance calculation is based on the following NAD27 coordinates: KTKN, N 55-20-22/W 131-28-12; KRBD, N 55-20-23/W 131-37-29)

- ***The Licensee for KTKN Does Not Object to Removing the Conditions.*** 47 CFR 73.1692 requires notification of a specified AM station prior to construction so that it may commence determining operating power by the indirect method. Alaska Broadcast Communications, licensee for KTKN, was notified accordingly, but after considering the distance of the KRBD facility from KTKN, and the nature of the proposed changes, Alaska Broadcast Communications does not believe the measures specified in 73.1692 are applicable. In a letter to KRBD, the KTKN licensee states it would not object to a request to remove the Special Operating Condition from the Construction Permits (see Exhibit "A").

Rainbird Community Broadcasting respectfully requests consideration of the points above, in determining the applicant's response to the Special Operating Conditions.

Attachments: Exhibit "A", Letter from Alaska Broadcast Communications

A L A S K A  
**BROADCAST**  
C O M M U N I C A T I O N S

September 2, 2005

Mr. Jeff Seifert, General Manager  
KRBD-FM  
Rainbird Community Broadcasting  
123 Stedman  
Ketchikan, Alaska 99901

Re: FCC Construction Permit BXPB-20050503ABX

Dear Mr. Seifert:

Alaska Broadcast Communications, Inc, licensee for AM station KTKN, Ketchikan, is aware that your construction permit, referenced above, contains a Special Condition resulting from the proximity of your facility to the KTKN antenna.

We understand that Special Condition #3 is based up 47 CFR 73.1692(c) of the Commission's Rules. After reviewing the circumstances, we believe this rule is not applicable to the changes proposed in your construction permit. We would not object if you were to request the FCC remove this condition from your application.

Sincerely,



Steven L. Rhyner  
General Manager  
Alaska Broadcast Communications, Inc.