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Attorney at Law

September 21, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals/445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Main Studio Location Request
KOMO-FM, Seattle, Washington

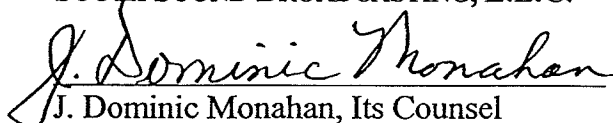
Dear Madame Secretary:

South Sound Broadcasting, L.L.C., the licensee of Station KOMO-FM [FIN 51167], Oakville, Washington, through its counsel, and pursuant to §73.1125(d)(2) respectfully requests approval for the relocation of the Station's main studio to 140 4th Avenue North, Seattle, Washington. Although this location is outside the 70dBu contour for the station as calculated using the standard contour prediction methodology of §73.313 of the Commissions Rules, the Longley-Rice v1.2.2 methodology demonstrates that the proposed location is well within the 80dBu contour of the station using the Longley-Rice method. Attached hereto is an engineering study demonstrating that the proposed main studio location is well within the actual 70dBu service contour of Station KOMO-FM.

An extra copy of this transmittal letter is enclosed, as well as a pre-addressed, stamped envelope. Please confirm your receipt of the filing of this application by date stamping the extra copy of this transmittal letter and returning it to the undersigned counsel.

Should additional information be desired concerning this request please contact the undersigned counsel.

SOUTH SOUND BROADCASTING, L.L.C.


J. Dominic Monahan, Its Counsel

JDM/slc

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Rudolfo Bonacci, FCC

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Coverage Study for Proposed Main Studio
KOMO-FM Channel 249C
Oakville, Washington
September 2011

This Engineering Statement has been prepared on behalf of South Sound Broadcasting, LLC ("South Sound"), licensee of station KOMO-FM, which operates on Channel 249C at Oakville, Washington. South Sound proposes to locate the KOMO-FM main studio at 140 Fourth Avenue North in Seattle, Washington. The NAD27 coordinates of this location are N47-37-09 x W122-20-50.

The 70 dBu contour from KOMO-FM, as calculated using the standard contour prediction methodology described in §73.313 of the Commission's Rules, does not encompass the proposed main studio site. The proposed main studio is located 84 kilometers from the proposed transmitter site at a bearing of 66 degrees True. The standard 70 dBu contour extends 67.6 kilometers along this radial, based on an ERP of 43.65 kW at 866 meters HAAT. South Sound is unable to avail itself of the other standard options for main studio location set forth in §73.1125 as a) there are no other stations licensed to Oakville, and b) the proposed main studio is not located within 40 km of Oakville. However, it is believed that a supplemental showing using alternative contour prediction methodology is justified in this instance in accordance with §73.313(e).

Longley-Rice for KOMO-FM Licensed Facility

Study has been made of the predicted 70 dBu field strength in the direction of the proposed main studio, using the Longley-Rice v1.2.2 methodology. This study has been conducted using the software program SIGNAL™ from EDX Wireless.

A sample calculation has been made to the proposed main studio location to verify the presence of at least 70 dBu service, using the formula:

$$\text{Field Strength} = \text{Free Space} - \text{Diffraction Loss} - \text{Clutter}$$

$$\text{Where Free Space} = 106.9 + \text{power in dBk} - 20\log(\text{distance in km to point of interest})$$

For the path studied (16.40 dBk over an 84 km path), the result of this calculation is:

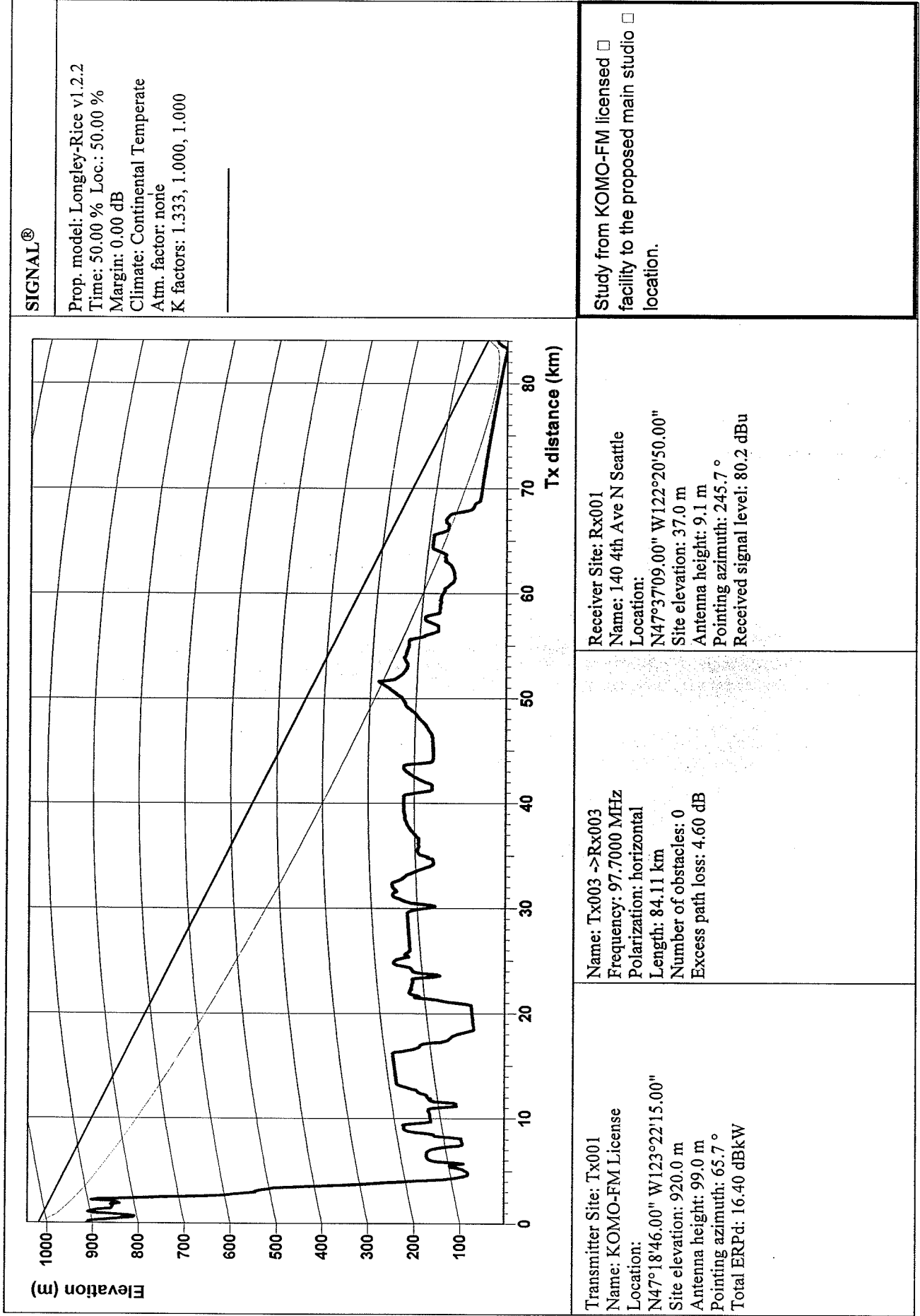
Radial	Free Space Field	Minus Diffraction Loss	Yields
66 deg	84.8 dBu	4.60 dB	80.2 dBu

Attached is a plot of the terrain path from the transmitter site to the proposed main studio location. The attached terrain path plot includes a list of the Longley-Rice study parameters.

The location of the Longley-Rice contour in the direction of the proposed main studio has been determined for 1-degree increment radials passing through the proposed main studio, as well as the radials on either side.

Radial	ERP HAAT	F(50,50) 70 dBu	L-R 75 dBu	L-R exceeds F(50,50) by
65 deg	16.50 dBk 861 m	67.7 km	84.7 km	25%
66 deg	16.40 dBk 866 m	67.6 km	87.2 km	29%
67 deg	16.30 dBk 871 m	67.5 km	86.7 km	28%

The attached map exhibit depicts the results of this analysis as a 75 dBu (chosen to allow for 5 dB of local clutter loss at the receive locations) contour over the span of 65 to 67 degrees.



Longley-Rice for KOMO-FM CP & Application Facility

KOMO-FM also holds a construction permit (FCC File No. BMPH-20100602AKM) for operation from the licensed tower site, but at a lower height above ground. In addition, a pending application (FCC File No. BMPH-20110630AGT) proposes operation with technical facilities identical to those specified in the construction permit, but with a change in community of license from Oakville to Belfair. An additional study has been made of the predicted 70 dBu field strength from the CP and application facility, in the direction of the proposed main studio, using the Longley-Rice v1.2.2 methodology. This study has been conducted using the software program SIGNAL™ from EDX Wireless.

A sample calculation has been made to the proposed main studio location to verify the presence of at least 70 dBu service, using the formula:

$$\text{Field Strength} = \text{Free Space} - \text{Diffraction Loss} - \text{Clutter}$$

$$\text{Where Free Space} = 106.9 + \text{power in dBk} - 20\log(\text{distance in km to point of interest})$$

For the path studied (18.39 dBk over an 84 km path), the result of this calculation is:

Radial	Free Space Field	Minus Diffraction Loss	Yields
66 deg	86.8 dBu	4.4 dB	82.4 dBu

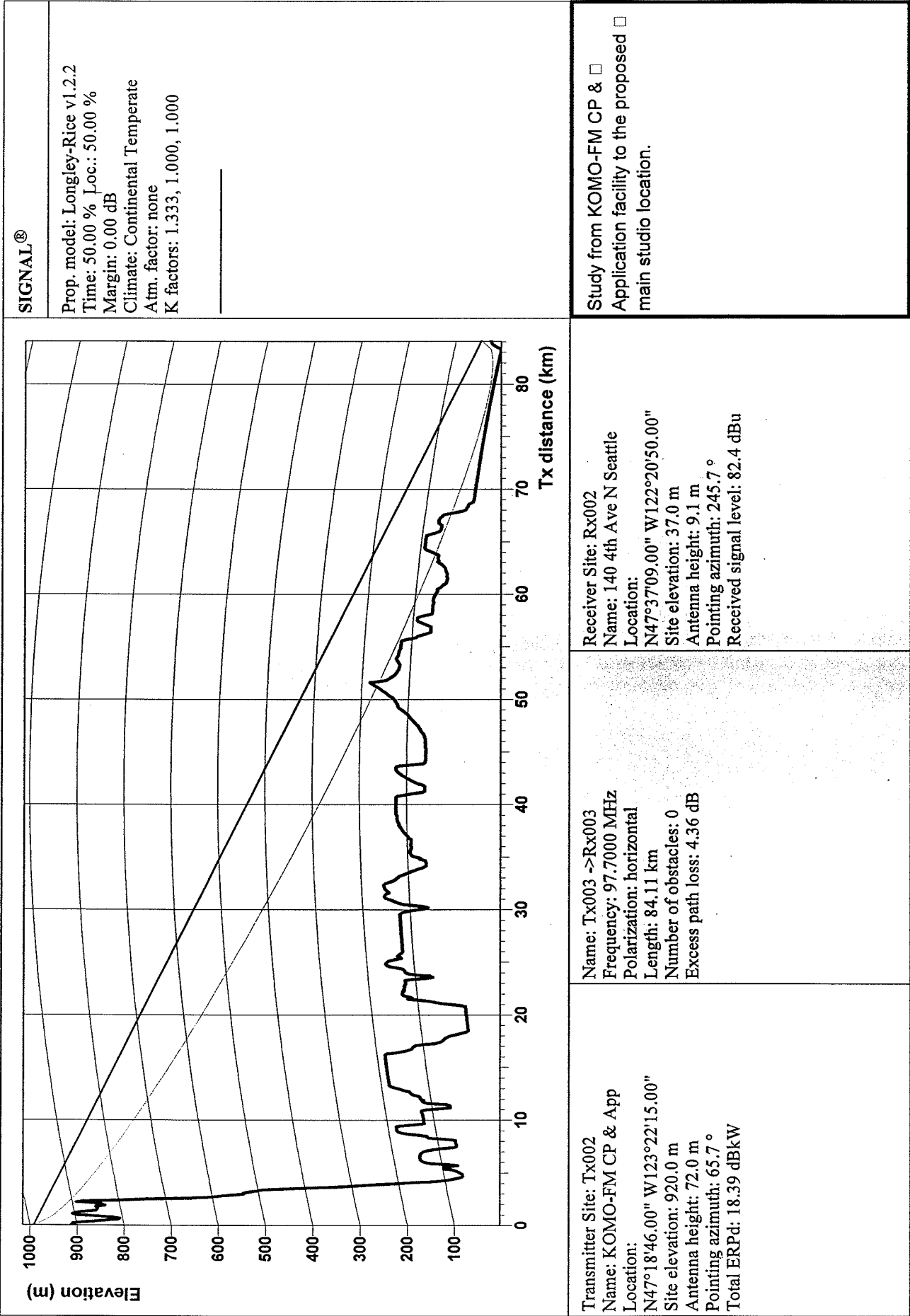
Attached is a plot of the terrain path from the transmitter site to the proposed main studio location. The attached terrain path plot includes a list of the Longley-Rice study parameters.

The location of the Longley-Rice contour in the direction of the proposed main studio has been determined for 1-degree increment radials passing through the proposed main studio, as well as the radials on either side.

Radial	ERP HAAT	F(50,50) 70 dBu	L-R 75 dBu	L-R exceeds F(50,50) by
65 deg	18.39 dBk 834 m	71.7 km	84.7 km	18%

66 deg	18.39 dBk 839 m	71.8 km	87.2 km	21%
67 deg	18.39 dBk 844 m	72.0 km	86.7 km	20%

The attached map exhibit depicts the results of this analysis as a 75 dBu (chosen to allow for 5 dB of local clutter loss at the receive locations) contour over the span of 65 to 67 degrees.



Statement of Engineer

This Engineering Statement has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Colorado.

Signed this 15th day of September 2011



Erik C. Swanson, P.E.

Hatfield & Dawson Consulting Engineers