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AUDIO SERVICES DIVISION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Accepted / Filed

OCT 11 2016

**Federal Communications Commission
Office of the Secretary**

Re: Station KCVR-FM
Columbia, California
FIN: 12063
Request for Confirmation of Compliance with
47 CFR 73.1125

Dear Ms. Dortch:

This office is counsel to Entravision Holdings, LLC (“Entravision”), the licensee of Station KCVR-FM, Columbia, California.

Pursuant to Section 73.1125 of the Commission’s Rules, Entravision is hereby requesting confirmation from the Commission that its proposal to locate at main studio for KCVR-FM will be in compliance with the applicable main studio location requirements.

The Commission’s Rules provide, in Section 73.1125(a)(2), that a main studio can be located within the principal community contour of any broadcast station licensed to the same community of license. In determining whether a proposed location is within such principal community contour, the Commission has previously considered whether a determination can be made applying alternate propagation methodology to calculate field strength contours. This includes the so-called “Longley-Rice” methodology as described in Section 73.313 of the Commission’s Rules. *See Letter to Xana Oregon, LLC* (Audio Division, November 13, 2015).

Consistent with the Commission’s processing standard for alternate propagation methodology to support the location of a main studio, Entravision is submitting the attached “Coverage Study for Proposed Main Studio,” which applies the “Longley-Rice” methodology to demonstrate that the main studio location proposed by Entravision lies within the principal community contour of KCVR-FM.

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Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Barry A. Friedman', with a stylized, cursive-like flow.

Barry A. Friedman

Enclosure

cc: Mr. Rodolfo Bonacci, FCC Audio Division

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**Coverage Study for Proposed Main Studio
KCVR-FM Channel 255A
Columbia, California
September 2016**

This Engineering Statement has been prepared on behalf of Entravision Holdings, LLC ("Entravision"), licensee of FM station KCVR-FM, which operates on Channel 255A at Columbia, California. Entravision proposes to locate the KCVR-FM main studio at 1620 N Carpenter Road in Modesto, California. The NAD27 coordinates of this location are N37-39-36.1 x W121-01-43.8.

The 70 dBu contour from KCVR-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 71.6 kilometers from the transmitter site at a bearing of 234 degrees True. The standard 70 dBu contour extends 30.4 kilometers along this radial, based on an ERP of 6 kW at 360 meters HAAT. Entravision 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 Columbia, and b) the proposed main studio is not located within 40 km of Columbia. 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 KCVR-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 (7.78 dBk over a 71.6 km path), the result of this calculation is:

Radial	Free Space Field	Minus Diffraction Loss	Yields
234 deg	77.6 dBu	6.8 dB	70.8 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.

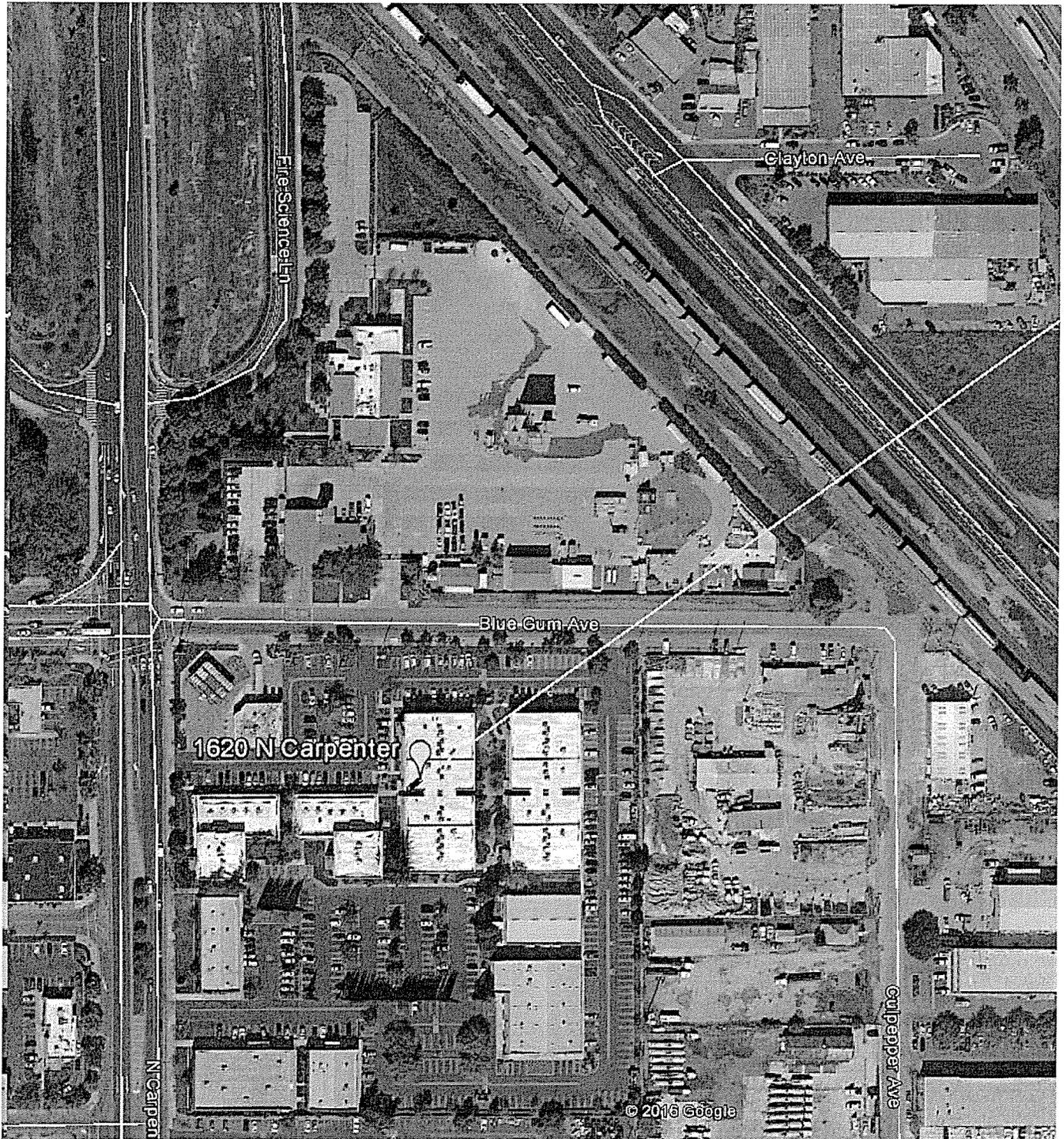
Radial	ERP HAAT	F(50,50) 70 dBu	L-R 70 dBu	L-R exceeds F(50,50) by
233 deg	7.78 dBk 361 m	30.4 km	76.0 km	150%
234 deg	7.78 dBk 360 m	30.4 km	75.6 km	149%
235 deg	7.78 dBk 359 m	30.4 km	75.2 km	147%

This study presumes that no additional attenuation factor need be included to account for local clutter loss in the vicinity of the main studio location. This main studio location is in the Central Valley of California, an area which is characterized by extremely flat terrain. Vegetation in the vicinity is sparse, comprised generally of widely-spaced deciduous trees no more than 20 feet in height.

The buildings in this vicinity are all of only one or two stories in height, with the exception of the three-story Spring Hill Suites building (which is situated 200 meters off the direct path between

KCVR-FM and the studio location, and a practice fire structure at the Modesto Fire Station across the street (which is situated 80 meters off the direct path). The campus within which the main studio would be located is comprised of two-story buildings of about 20 feet in height, with flat roofs. See attached overhead photo. Given a receive antenna elevation of 30 feet above ground, there will be no local obstruction of the KCVR-FM signal.

In this circumstance, the effect of local “clutter” is believed to be so minimal that it cannot be quantified, and is therefore assumed to be zero.



Statement of Engineer

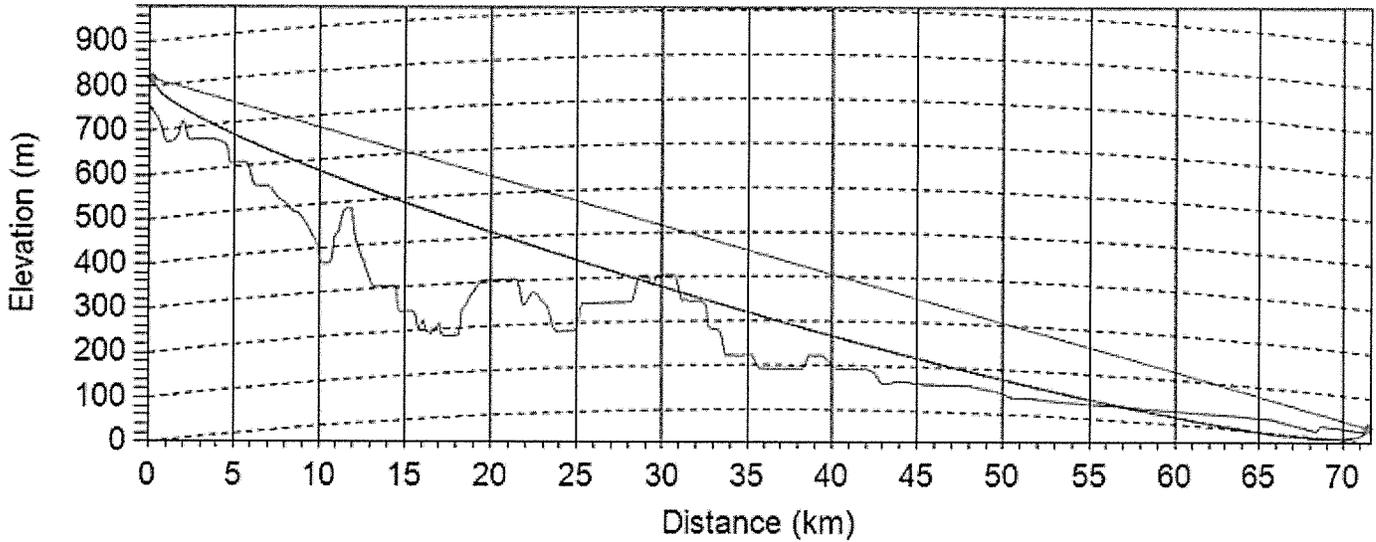
This Engineering Statement has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield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

Signed this 28th day of September 2016



Erik C. Swanson, P.E.

Link: Tx001 -> Rx001



Link end 1 ID:	Tx001	Link end 2 ID:	Rx001
Site name:	KCVR-FM	Site name:	1620 N Carpenter
Latitude:	N38°02'15.00"	Latitude:	N37°39'36.10"
Longitude:	W120°22'05.00"	Longitude:	W121°01'43.80"
Transmitter Frequency:	98.9 MHz	Received signal level:	-44.15 dBmW (70.8 dBu)
Polarization:	horizontal	Receiver noise level:	-100.63 dBmW
Antenna elevation (AMSL):	818.00 m	Antenna elevation (AMSL):	33.10m (9.1m AGL)
Point az. to link end 2:	234.32°	Point az. to link end 1:	53.91°
Pointing elev. to link end 2:	-0.93°	Pointing elev. to link end 1:	0.31°
Antenna gain toward link end 2:	0.00 dBd	Antenna gain toward link end 1:	0.00 dBd
ERPd toward link end 2:	7.78 dBkW	Net diversity gain:	0.00 dB

Path:	Tx001 -> Rx001
Length:	71.5940 km
Number of obstacles:	0
Excess pathloss:	6.77 dB
Atm. Absorption loss:	0.00 dB
Path loss for Stats:	116.23 dB
Path Fresnel zone clearance:	----
K factor:	1.333