

Allocation Study**1. Compliance with 47 C.F.R. 73.207**

The proposed facility meets all minimum distance separation requirements with regard to co-channel, first, second, or third adjacent channel stations, and those separated by 53/54 channels, except the license of KCYN Channel 246C1 Moab, UT (FIN 72729). The proposed facility is 9.7 kilometers short-spaced to KCYN.

This application proposes contour protection for KCYN according to the guidelines of 47 C.F.R. 73.215. Section 47 C.F.R. 73.215(e) states that the minimum separation requirement between a class A and a class C1 facility, which are separated by 200 kHz, is 111 km. Exhibit 17-A shows that KCYN is separated from the proposed facility by 123.26 km.

Therefore, the proposed facility is permitted to use contour protection toward the short-space facilities (See Exhibit 20 for compliance with contour protection requirements).

2. Fully Spaced Theoretical Site

A theoretical allotment site has been identified. It is located at 38° 47' 59" N by 107° 47' 58"W and is, in fact, fully spaced.

Exhibit Index:

- Exhibit 17-A shows the spacing at the proposed site.
- Exhibit 17-B demonstrates that the theoretical allotment site meets the minimum distance separation requirements of 47 C.F.R. 73.207.
- Exhibit 17-C shows the city of license coverage map for the allotment site.
- Exhibit 20 shows the protected and interfering contours, in all directions, for the proposed operation.

Educational Media Foundation

5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Exhibit 17-A

Hotchkiss, CO

Proposed Site Spacing

REFERENCE

38 49 04.0 N.

CLASS = A

DISPLAY DATES

DATA 04-22-16

107 56 20.0 W.

Current Spacings to 3rd Adj.

SEARCH 04-22-16

----- Channel 245 - 96.9 MHz -----

Call	Channel	Location		Azi	Dist	FCC	Margin	
KCYN	LIC	246C1	Moab	UT	255.2	123.26	133.0	-9.7
KDAG	LIC	245C0	Farmington	NM	178.9	222.38	215.0	7.4
KUUR	LIC-N	244A	Carbondale	CO	36.1	82.93	72.0	10.9
KAYV	LIC	246A	Crested Butte	CO	83.3	84.38	72.0	12.4
KSYF	LIC-N	298C1	Olathe	CO	154.2	53.04	22.0	31.0
KBCR-FM	LIC	245C2	Steamboat Springs	CO	26.7	205.11	166.0	39.1
KCCY-FM	LIC	245C	Pueblo	CO	90.8	267.53	226.0	41.5

Allotment Site Spacing

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REFERENCE                                     DISPLAY DATES
38 47 59.0 N.                                CLASS = A      DATA 05-17-16
107 47 58.0 W.                               Current Spacings to 3rd Adj.  SEARCH 05-17-16
----- Channel 245 - 96.9 MHz -----
    
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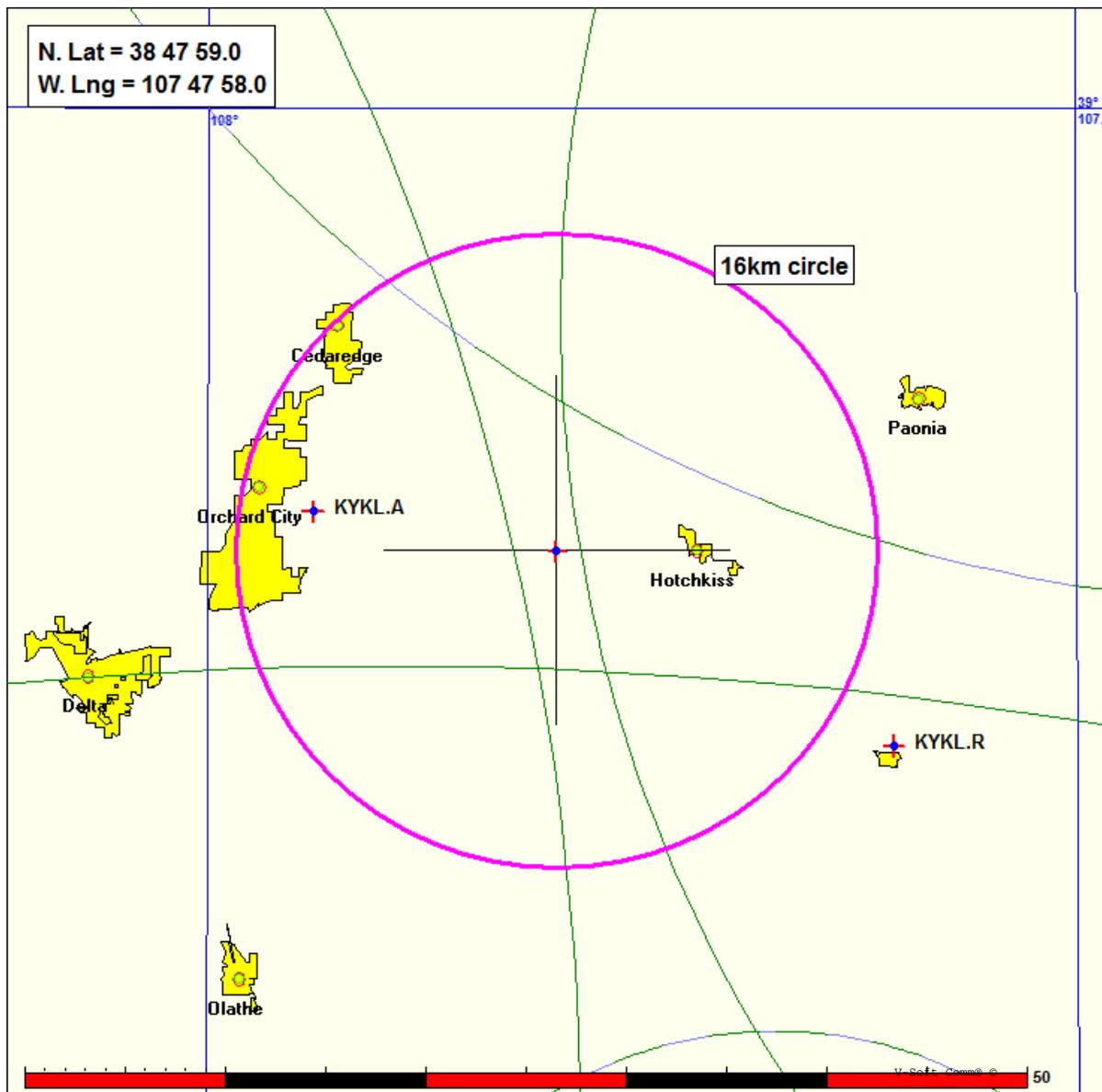
Call	Channel	Location		Azi	Dist	FCC	Margin
KYKL	APP-N 245A	Hotchkiss	CO	279.5	12.27	115.0	-102.7
KYKL	RSV-A 245A	Hotchkiss	CO	120.2	19.51	115.0	-95.5
KAYV	LIC 246A	Crested Butte	CO	80.6	72.66	72.0	0.7
KCYN	LIC 246C1	Moab	UT	257.4	134.56	133.0	1.6
KDAG	LIC 245C0	Farmington	NM	182.1	220.49	215.0	5.5
KUUR	LIC-N 244A	Carbondale	CO	28.2	78.15	72.0	6.2
KSYF	LIC-N 298C1	Olathe	CO	166.6	47.04	22.0	25.0
KCCY-FM	LIC 245C	Pueblo	CO	90.4	255.40	226.0	29.4
KBCR-FM	LIC 245C2	Steamboat Springs	CO	23.5	201.77	166.0	35.8
NEW	CP 247A	Lake City	CO	154.9	98.56	31.0	67.6

 RSV-R = reserved - needs protection, RSV-A = allocation.

CH 245 A 96.9 MHz

Current Spacings to 3rd Adj.
Exhibit 17-C

Exhibit 17-C



Data Date:05-17-16 Job Date:05-17-16

Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
KYKL.A	245A	APP-N	Hotchkiss	CO	279.5	12.27	115.0	-102.7
KYKL	245A	RSV-A	Hotchkiss	CO	120.2	19.51	115.0	-95.5
KAYV	246A	LIC	Crested Butte	CO	80.6	72.66	72.0	0.7
KCYN	246C1	LIC	Moab	UT	257.4	134.56	133.0	1.6
KDAG	245C0	LIC	Farmington	NM	182.1	220.49	215.0	5.5
KUUR	244A	LIC-N	Carbondale	CO	28.2	78.15	72.0	6.2
KSYF	298C1	LIC-N	Olathe	CO	166.6	47.04	22.0	25.0
KCCY-FM	245C	LIC	Pueblo	CO	90.4	255.40	226.0	29.4
KBCR-FM	245C2	LIC	Steamboat Spring	CO	23.5	201.77	166.0	35.8
NEW.C	247A	CP	Lake City	CO	154.9	98.56	31.0	67.6

RSV-R, reserved, needs protection, RSV-A, allocation, does not if a CP or LIC has been granted.