



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN APPLICATION
FOR CONSTRUCTION PERMIT
KAST-FM - GLADSTONE, OREGON
CHANNEL 226C3, 0.480 kW (max), 387 METERS HAAT
FACILITY ID NUMBER 82062**

Applicant: New Northwest Broadcasters, LLC

I am a Radio Engineer in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by New Northwest Broadcasters, LLC, the licensee of FM broadcast station KAST-FM, Astoria, Oregon, to prepare this statement and the associated exhibits in support of a minor change Application for Construction Permit. Radio station KAST-FM, Astoria, OR, is presently licensed (FCC File No BLH-991209AA) to operate on Channel 225C1. This minor change application is filed in response to the Commission's Report and Order in MB Docket 02-136, Adopted July 7, 2004, Released July 9, 2004 ("Report and Order"). The Report and Order, required KAST-FM to file a minor change application for construction permit to change community of license to Gladstone, Oregon and change from Channel 225C1 to Channel 226C3. Accordingly, the instant application requests authority to relocate KAST-FM to an existing tower, change

community of license to Gladstone, and implement a nondirectional Class C3 technical facility on Channel 226 using the provisions of Section 73.215 of the FCC Rules.

ALLOCATION CONSIDERATIONS

The proposed KAST-FM transmitter site is located 168.6 km from cochannel station KGNU(FM), Springfield-Eugene, OR. The Report and Order, which approved the KAST-FM community of license and channel change, also required KGNU(FM) to change from Channel 226C (cochannel to KAST-FM, Gladstone, OR) to Channel 227C (a first-adjacent channel to KAST-FM, Gladstone, OR). This allocation study considers KGNU(FM) on the newly approved Channel 227C.

Because the proposed KAST-FM transmitter site would be 7.4 km short-spaced to first-adjacent channel Class C station KGNU(FM), the applicant requests Section 73.215 processing with respect to KGNU(FM). The 168.6 kilometer KAST-FM/KGNU separation satisfies the 165 km minimum distance separation specified in Section 73.215(e) for first-adjacent channel related Class C3-to-Class C facilities. Exhibit 1 depicts the proposed KAST-FM protected and interfering contours as well as the protected and interfering

contours resulting from a maximum Class C facility at KGNU(FM).¹ As shown in Exhibit 1, no overlap will be caused or received as a result of the instant proposal.

According to the Commission's engineering database, the proposed KAST-FM, Gladstone, OR, Channel 226C3, transmitter site is also 36.8 kilometers short-spaced to a proposed allotment at Trout Lake, WA (Channel 226A) and 96 kilometers short-spaced to the KPDQ-FM, Portland, OR, licensed transmitter site (Channel 229C). The Report and Order, which approved the KAST-FM community of license change and channel change, added the Trout Lake allotment on Channel 236A (not Channel 226A; ten channels removed from KAST-FM) and Ordered KPDQ-FM to Channel 230C2 (four channels removed from KAST-FM). As a result, neither KPDQ-FM nor the new Trout Lake allotment present any allocation concerns to instant proposal.

TECHNICAL FACILITIES

The applicant proposes to use the existing master antenna on an existing tower. A type-accepted transmitter of adequate power for the required Transmitter Power Output (TPO) will be used to achieve the proposed Effective Radiated Power.

¹ The maximum Class C parameters for KGNU(FM) were calculated as follows:
KGNU(FM) Licensed HAAT = 396 meters
Maximum Class C HAAT = 600 meters
Section 73.215 antenna height adjustment = +204 meters
KGNU(FM) Licensed Radiation Centerline Height Above Mean Sea Level = 588 meters
KGNU(FM) Maximum Class C adjusted RCAMSL = 792 meters
KGNU(FM) Maximum Class C ERP = 100 kW

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.313 of the Rules utilizing the appropriate F(50,50) propagation curves from the Rules (Section 73.333, Figure 1), effective radiated power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3.2 kilometers to 16.1 kilometers from the proposed site was obtained from a National Geophysical Data Center Thirty Second Point Topographic Database (TGP-0050).

The 3.16 mV/m (70 dBu) city-grade contour completely encompasses the principal community to be served, as required by Section 73.315(a) of the Commission's Rules.

BLANKETING AND INTERMODULATION INTERFERENCE

In the event that blanketing interference occurs, the applicant will take appropriate steps to minimize the interference within the blanketing contour. Further, the applicant accepts the responsibility to alleviate any new intermodulation interference, including receiver induced, resulting from the instant proposal combined with a broadcast facility located within 10 kilometers of the proposed site as required by FCC rules.

In accordance with Commission precedent (See WK LX, Inc., 6 FCC Rcd 225 (1991)), the applicant will exclude both mobile and battery-powered receivers from Receiver Induced Third Order Intermodulation and Blanketing Interference Resolution

Requirements. In the event any type of intermodulation interference occurs with any other facilities which have not been identified, the applicant will take appropriate steps (i.e., install and maintain traps or filters) to minimize the interference in fixed receivers. The applicant will respond to complaints of blanketing interference for a period of one year in compliance with Section 73.318(b) of the Commission's Rules.

FAA NOTIFICATION AND TOWER REGISTRATION

No new tower construction is proposed herein. KAST-FM will use an existing master antenna on an existing tower structure. The FCC tower registration number for the existing support structure is 1033770.

RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The current guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations, as well as "uncontrolled" situations that apply in cases that affect the general public. The FCC's

Office of Engineering and Technology (OET) Commission issued a technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997), to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The Bulletin contains updated and additional technical information for evaluating compliance with the current FCC policies and guidelines.

The current FCC MPE level for "uncontrolled" environments is 0.2 milliwatt per centimeter squared (mW/cm^2) for FM facilities. The MPE level for FM facilities in a "controlled" environment is $1.0 \text{ mW}/\text{cm}^2$.

There are a total of seven full service FM stations licensed at the proposed KAST-FM transmitter site. As a result, the instant transmitter site is considered a multiple use site. In accordance with Section 1.1307(b) of the FCC Rules, "when performing an evaluation for compliance with the FCC RF guidelines all significant contributors to the ambient RF environment should be considered". As discussed below, the predicted KAST-FM power density contribution at the multiple use site is not considered significant and does not require consideration.

Based on a worst-case RFR analysis, the proposed KAST-FM facility will produce a predicted power density at two meters above ground level of $0.00114 \text{ mW}/\text{cm}^2$. This represents only 0.7% of the FCC guideline value in an "uncontrolled" RFR environment.

STATEMENT OF WILLIAM J. GETZ
KAST-FM, GLADSTONE, OREGON
PAGE 7

Pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed KAST-FM facility would contribute less than 5% of the uncontrolled and controlled exposure limit at the multiple use site, the proposal's power density contribution is insignificant.

OCCUPATIONAL SAFETY

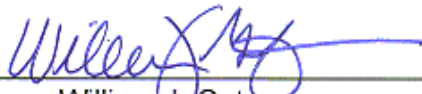
Radio station KAST-FM will cooperate/coordinate with other site users and reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

In light of the above, the proposed KAST-FM facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Section III-B, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: August 9, 2004



William J. Getz