

**WPTTO**  
**MINOR CHANGE Low Power FM**  
**KPEA-LP SAN FRANCISCO CA**

**Parameters**

Coordinates:	37 52 17.8 N 122 32 03.0 W NAD 27
	37 52 17.5 N 122 32 06.9 W NAD 83
CH:	241
Frequency:	96.1 MHz
Power:	0.017 kW
Type:	LPFM
Ground:	131 M
COR:	138.6 M
HAAT:	71.1 M
AGL:	7.6 M



FCC 60 dBu F(50,50)

## Spacing

World Peace Through Technology Organization

REFERENCE

37 52 17.8 N.  
122 32 03.0 W.

CLASS = L1

Current Spacings to 2nd Adj.

DISPLAY DATES

DATA 11-14-17

SEARCH 11-19-17

----- Channel 241 - 96.1 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
*KOIT	LIC 243B	San Francisco	CA 150.7	14.81	66.5	-51.7
*KGMZ	LIC 239B	San Francisco	CA 157.0	21.93	66.5	-44.6
KPEA-LP	LIC 241L1	San Francisco	CA 102.4	3.44	23.5	-20.1
KEXU-LP	LIC 241L1	Oakland	CA 110.4	28.06	23.5	4.6
KACR-LP	LIC 241L1	Alameda	CA 115.1	28.29	23.5	4.8
KJTZ-LP	LIC 241L1	Alameda	CA 115.1	28.29	23.5	4.8
1594241	APP 241L1	Millbrae	CA 157.4	32.35	23.5	8.9
KYMX	LIC 241B	Sacramento	CA 44.9	120.70	111.5	9.2
KQEM-LP	LIC 241L1	Millbrae	CA 159.1	36.77	23.5	13.3
KSQQ	LIC 241A	Morgan Hill	CA 139.6	100.06	66.5	33.6
KRSH	LIC 240A	Healdsburg	CA 344.2	99.76	55.5	44.3

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All separation margins include rounding  
\*Second Adj - See Waiver

### Spacing Map



Red Circles: KFFD-LP Licensed, and KFFD-LP Current CP

### TOWAIR Determination (PASS)

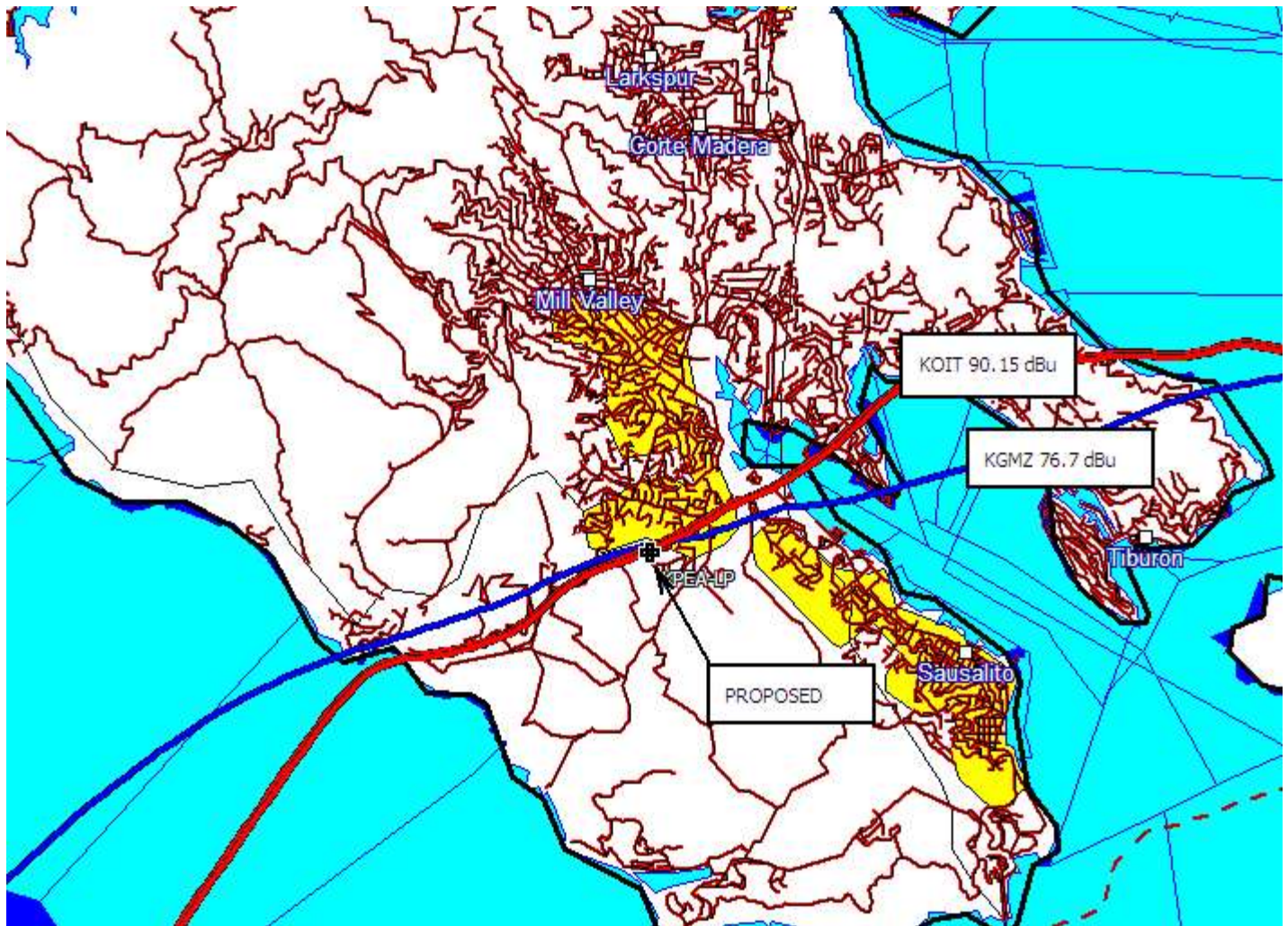
<b>DETERMINATION Results</b>	
<b>Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.</b>	
<b>Your Specifications</b>	
<b>NAD83 Coordinates</b>	
Latitude	37-52-17.5 north
Longitude	122-32-06.9 west
<b>Measurements (Meters)</b>	
Overall Structure Height (AGL)	11
Support Structure Height (AGL)	0
Site Elevation (AMSL)	131
<b>Structure Type</b>	
POLE - Any type of Pole	

### **Second Adjacent Channel Waiver Request**

License respectfully requests a "second adjacent channel waiver" with regards to Section 47 C.F.R. Section 73.807 of the FCC rules based upon the "Living Way" precedence (Living Way Ministries, Inc., Memorandum Opinion and Order, 17 FCC Red 17054, 17056, ¶ 5 (2002), recon. denied 23 FCC Red 15070 (2008)). This will be accomplished by used Free Space methodology of calculation.

Using U/D methodology, at the proposed KPEA-LP transmitter location KOIT has a signal strength of 90.15 dBu and KGMZ has a signal strength of 76.7 dBu. Interference will occur when the lesser signal strength (KGMZ) interfering signal exceeds the desired signal by 40 dbu. So the area of predicted interference would then be bounded by the 116.7 dBu contour.





The distance to this contour, using free space method:

$D = (7.01 \cdot P^{1/2}) / E$ , where P is power (watts), E is field strength (v/m), and D is distance to contour (meters):

P = 17 w, E = 116.7 dBu  
D = 42.2 meters

However, the field strength of the proposed LPFM's antenna system falls quickly at depression angles below the horizon. Using elevation pattern data provided by Nicom (4 bay 0.85 spaced BKG77 antenna) for a 0.85 wave spaced antenna, the distance to the 116.7 dBu contour at various depression angles is tabulated below. The data shows that the lowest point at which the signal strength rises to 116.7 dBu is 4.7 meters below the center of radiation of the antenna system, or 2.5 meters above the ground. Therefore, this is sufficient clearance, and the interference area encompasses zero population. The table below show that the lowest elevation point of the 116.7 dBu

F(50,10) interfering contour is 2.5 meters above the ground. Site is on top of hill on private property.

Due to zero population within this radiation radius, this meets the "Living way" Criteria to qualify for a Waiver of 47 C.F.R. Section 73.807.

Thus, the applicant requests second adjacent waiver based upon evidence no interference is proposed.

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A MAX ERP  
B DEPRESSION ANGLE BELOW HORIZON  
C RELATIVE FIELD  
D dB FROM RELATIVE  
E ERP  
F ANGULAR DISTANCE TO 116.7 dBu CONTOUR  
G VERTICAL DISTANCE (below antenna)  
H HORIZONTAL DISTANCE TO 116.7 dBu CONTOUR  
I CLEARANCE OF CONTOUR ABOVE GROUND

A	B	C	D	E	F	G	H	I
17	0	1	0.000	17.00	42.2	0	42.2	7.6
17	0.5	0.998	-0.017	16.93	42.1	0.3	42	7.3
17	1	0.994	-0.052	16.80	42	0.7	41.9	6.9
17	1.5	0.987	-0.114	16.56	41.7	1	41.6	6.6
17	2	0.977	-0.202	16.23	41.2	1.4	41.1	6.2
17	2.5	0.964	-0.318	15.80	40.7	1.7	40.6	5.9
17	3	0.949	-0.455	15.31	40.1	2	40	5.6
17	3.5	0.931	-0.621	14.73	39.3	2.3	39.2	5.3
17	4	0.911	-0.810	14.11	38.5	2.6	38.4	5
17	4.5	0.888	-1.032	13.41	37.5	2.9	37.3	4.7
17	5	0.863	-1.280	12.66	36.4	3.1	36.2	4.5
17	5.5	0.836	-1.556	11.88	35.3	3.3	35.1	4.3
17	6	0.806	-1.873	11.04	34	3.5	33.8	4.1
17	6.5	0.775	-2.214	10.21	32.7	3.6	32.4	4
17	7	0.742	-2.592	9.36	31.3	3.8	31	3.8
17	7.5	0.707	-3.012	8.50	29.8	3.8	29.5	3.8
17	8	0.671	-3.466	7.65	28.3	3.9	28	3.7
17	8.5	0.634	-3.958	6.83	26.7	3.9	26.4	3.7
17	9	0.596	-4.495	6.04	25.1	3.9	24.7	3.7
17	9.5	0.557	-5.083	5.27	23.5	3.8	23.1	3.8
17	10	0.517	-5.730	4.54	21.8	3.7	21.4	3.9
17	10.5	0.476	-6.448	3.85	20.1	3.6	19.7	4
17	11	0.434	-7.250	3.20	18.3	3.4	17.9	4.2
17	11.5	0.393	-8.112	2.63	16.6	3.3	16.2	4.3
17	12	0.352	-9.069	2.11	14.8	3	14.4	4.6
17	12.5	0.311	-10.145	1.64	13.1	2.8	12.7	4.8
17	13	0.271	-11.341	1.25	11.4	2.5	11.1	5.1
17	13.5	0.231	-12.728	0.91	9.7	2.2	9.4	5.4
17	14	0.193	-14.289	0.63	8.1	1.9	7.8	5.7
17	14.5	0.155	-16.193	0.41	6.5	1.6	6.2	6
17	15	0.118	-18.562	0.24	4.9	1.2	4.7	6.4
17	15.5	0.083	-21.618	0.12	3.5	0.9	3.3	6.7
17	16	0.049	-26.196	0.04	2	0.5	1.9	7.1

17	16.5	0.017	-35.391 0.00	0.7	0.1	0.6	7.5
17	17	0.014	-37.077 0.00	0.5	0.1	0.4	7.5
17	17.5	0.043	-27.331 0.03	1.8	0.5	1.7	7.1
17	18	0.071	-22.975 0.09	3	0.9	2.8	6.7
17	18.5	0.096	-20.355 0.16	4	1.2	3.7	6.4
17	19	0.119	-18.489 0.24	5	1.6	4.7	6
17	19.5	0.141	-17.016 0.34	5.9	1.9	5.5	5.7
17	20	0.161	-15.863 0.44	6.8	2.3	6.3	5.3
17	20.5	0.178	-14.992 0.54	7.5	2.6	7	5
17	21	0.193	-14.289 0.63	8.1	2.9	7.5	4.7
17	21.5	0.206	-13.723 0.72	8.7	3.1	8	4.5
17	22	0.217	-13.271 0.80	9.1	3.4	8.4	4.2
17	22.5	0.226	-12.918 0.87	9.5	3.6	8.7	4
17	23	0.233	-12.653 0.92	9.8	3.8	9	3.8
17	23.5	0.239	-12.432 0.97	10.1	4	9.2	3.6
17	24	0.242	-12.324 1.00	10.2	4.1	9.3	3.5
17	24.5	0.243	-12.288 1.00	10.2	4.2	9.2	3.4
17	25	0.243	-12.288 1.00	10.2	4.3	9.2	3.3
17	25.5	0.241	-12.360 0.99	10.1	4.3	9.1	3.3
17	26	0.237	-12.505 0.95	10	4.3	8.9	3.3
17	26.5	0.232	-12.690 0.92	9.8	4.3	8.7	3.3
17	27	0.225	-12.956 0.86	9.5	4.3	8.4	3.3
17	27.5	0.217	-13.271 0.80	9.1	4.1	8	3.5
17	28	0.208	-13.639 0.74	8.7	4	7.6	3.6
17	28.5	0.198	-14.067 0.67	8.3	3.9	7.2	3.7
17	29	0.186	-14.610 0.59	7.8	3.7	6.8	3.9
17	29.5	0.174	-15.189 0.51	7.3	3.5	6.3	4.1
17	30	0.161	-15.863 0.44	6.8	3.3	5.8	4.3
17	30.5	0.147	-16.654 0.37	6.2	3.1	5.3	4.5
17	31	0.132	-17.589 0.30	5.5	2.8	4.7	4.8
17	31.5	0.117	-18.636 0.23	4.9	2.5	4.1	5.1
17	32	0.102	-19.828 0.18	4.3	2.2	3.6	5.4
17	32.5	0.086	-21.310 0.13	3.6	1.9	3	5.7
17	33	0.07	-23.098 0.08	2.9	1.5	2.4	6.1
17	33.5	0.054	-25.352 0.05	2.2	1.2	1.8	6.4
17	34	0.038	-28.404 0.02	1.6	0.8	1.3	6.8
17	34.5	0.023	-32.765 0.01	0.9	0.5	0.7	7.1
17	35	0.007	-43.098 0.00	0.2	0.1	0.1	7.5
17	35.5	0.008	-41.938 0.00	0.3	0.1	0.2	7.5
17	36	0.023	-32.765 0.01	0.9	0.5	0.7	7.1
17	36.5	0.037	-28.636 0.02	1.5	0.8	1.2	6.8
17	37	0.051	-25.849 0.04	2.1	1.2	1.6	6.4
17	37.5	0.064	-23.876 0.07	2.7	1.6	2.1	6
17	38	0.077	-22.270 0.10	3.2	1.9	2.5	5.7
17	38.5	0.089	-21.012 0.13	3.7	2.3	2.8	5.3
17	39	0.1	-20.000 0.17	4.2	2.6	3.2	5
17	39.5	0.111	-19.094 0.21	4.6	2.9	3.5	4.7
17	40	0.12	-18.416 0.24	5	3.2	3.8	4.4
17	40.5	0.129	-17.788 0.28	5.4	3.5	4.1	4.1
17	41	0.137	-17.266 0.32	5.7	3.7	4.3	3.9
17	41.5	0.144	-16.833 0.35	6	3.9	4.4	3.7
17	42	0.15	-16.478 0.38	6.3	4.2	4.6	3.4
17	42.5	0.156	-16.138 0.41	6.5	4.3	4.7	3.3
17	43	0.16	-15.918 0.44	6.7	4.5	4.9	3.1
17	43.5	0.164	-15.703 0.46	6.9	4.7	5	2.9
17	44	0.167	-15.546 0.47	7	4.8	5	2.8
17	44.5	0.169	-15.442 0.49	7.1	4.9	5	2.7

17	45	0.17	-15.391 0.49	7.1	5	5	2.6
17	45.5	0.17	-15.391 0.49	7.1	5	4.9	2.6
17	46	0.17	-15.391 0.49	7.1	5.1	4.9	2.5
17	46.5	0.169	-15.442 0.49	7.1	5.1	4.8	2.5
17	47	0.167	-15.546 0.47	7	5.1	4.7	2.5
17	47.5	0.165	-15.650 0.46	6.9	5	4.6	2.6
17	48	0.162	-15.810 0.45	6.8	5	4.5	2.6
17	48.5	0.158	-16.027 0.42	6.6	4.9	4.3	2.7
17	49	0.154	-16.250 0.40	6.5	4.9	4.2	2.7
17	49.5	0.149	-16.536 0.38	6.2	4.7	4	2.9
17	50	0.144	-16.833 0.35	6	4.5	3.8	3.1
17	50.5	0.138	-17.202 0.32	5.8	4.4	3.6	3.2
17	51	0.133	-17.523 0.30	5.6	4.3	3.5	3.3
17	51.5	0.126	-17.993 0.27	5.3	4.1	3.3	3.5
17	52	0.12	-18.416 0.24	5	3.9	3	3.7
17	52.5	0.113	-18.938 0.22	4.7	3.7	2.8	3.9
17	53	0.106	-19.494 0.19	4.4	3.5	2.6	4.1
17	53.5	0.098	-20.175 0.16	4.1	3.2	2.4	4.4
17	54	0.091	-20.819 0.14	3.8	3	2.2	4.6
17	54.5	0.083	-21.618 0.12	3.5	2.8	2	4.8
17	55	0.075	-22.499 0.10	3.1	2.5	1.7	5.1
17	55.5	0.067	-23.479 0.08	2.8	2.3	1.5	5.3
17	56	0.06	-24.437 0.06	2.5	2	1.3	5.6
17	56.5	0.052	-25.680 0.05	2.1	1.7	1.1	5.9
17	57	0.044	-27.131 0.03	1.8	1.5	0.9	6.1
17	57.5	0.036	-28.874 0.02	1.5	1.2	0.8	6.4
17	58	0.028	-31.057 0.01	1.1	0.9	0.5	6.7
17	58.5	0.021	-33.556 0.01	0.8	0.6	0.4	7
17	59	0.013	-37.721 0.00	0.5	0.4	0.2	7.2
17	59.5	0.006	-44.437 0.00	0.2	0.1	0.1	7.5
17	60	0.001	-60.000 0.00	0	0	0	7.6
17	60.5	0.008	-41.938 0.00	0.3	0.2	0.1	7.4
17	61	0.015	-36.478 0.00	0.6	0.5	0.2	7.1
17	61.5	0.021	-33.556 0.01	0.8	0.7	0.3	6.9
17	62	0.027	-31.373 0.01	1.1	0.9	0.5	6.7
17	62.5	0.033	-29.630 0.02	1.3	1.1	0.6	6.5
17	63	0.039	-28.179 0.03	1.6	1.4	0.7	6.2
17	63.5	0.045	-26.936 0.03	1.9	1.6	0.8	6
17	64	0.05	-26.021 0.04	2.1	1.8	0.9	5.8
17	64.5	0.055	-25.193 0.05	2.3	2	0.9	5.6
17	65	0.059	-24.583 0.06	2.4	2.1	1	5.5
17	65.5	0.064	-23.876 0.07	2.7	2.4	1.1	5.2
17	66	0.068	-23.350 0.08	2.8	2.5	1.1	5.1
17	66.5	0.071	-22.975 0.09	3	2.7	1.1	4.9
17	67	0.075	-22.499 0.10	3.1	2.8	1.2	4.8
17	67.5	0.078	-22.158 0.10	3.2	2.9	1.2	4.7
17	68	0.081	-21.830 0.11	3.4	3.1	1.2	4.5
17	68.5	0.083	-21.618 0.12	3.5	3.2	1.2	4.4
17	69	0.086	-21.310 0.13	3.6	3.3	1.2	4.3
17	69.5	0.088	-21.110 0.13	3.7	3.4	1.2	4.2
17	70	0.089	-21.012 0.13	3.7	3.4	1.2	4.2
17	70.5	0.091	-20.819 0.14	3.8	3.5	1.2	4.1
17	71	0.093	-20.630 0.15	3.9	3.6	1.2	4
17	71.5	0.094	-20.537 0.15	3.9	3.6	1.2	4
17	72	0.095	-20.446 0.15	4	3.8	1.2	3.8
17	72.5	0.095	-20.446 0.15	4	3.8	1.2	3.8
17	73	0.096	-20.355 0.16	4	3.8	1.1	3.8



17	73.5	0.096	-20.355 0.16	4	3.8	1.1	3.8
17	74	0.096	-20.355 0.16	4	3.8	1.1	3.8
17	74.5	0.096	-20.355 0.16	4	3.8	1	3.8
17	75	0.096	-20.355 0.16	4	3.8	1	3.8
17	75.5	0.096	-20.355 0.16	4	3.8	1	3.8
17	76	0.095	-20.446 0.15	4	3.8	0.9	3.8
17	76.5	0.095	-20.446 0.15	4	3.8	0.9	3.8
17	77	0.094	-20.537 0.15	3.9	3.7	0.8	3.9
17	77.5	0.093	-20.630 0.15	3.9	3.8	0.8	3.8
17	78	0.092	-20.724 0.14	3.8	3.7	0.7	3.9
17	78.5	0.09	-20.915 0.14	3.8	3.7	0.7	3.9
17	79	0.089	-21.012 0.13	3.7	3.6	0.7	4
17	79.5	0.088	-21.110 0.13	3.7	3.6	0.6	4
17	80	0.086	-21.310 0.13	3.6	3.5	0.6	4.1
17	80.5	0.085	-21.412 0.12	3.5	3.4	0.5	4.2
17	81	0.085	-21.412 0.12	3.5	3.4	0.5	4.2
17	81.5	0.084	-21.514 0.12	3.5	3.4	0.5	4.2
17	82	0.083	-21.618 0.12	3.5	3.4	0.4	4.2
17	82.5	0.082	-21.724 0.11	3.4	3.3	0.4	4.3
17	83	0.081	-21.830 0.11	3.4	3.3	0.4	4.3
17	83.5	0.08	-21.938 0.11	3.3	3.2	0.3	4.4
17	84	0.078	-22.158 0.10	3.2	3.1	0.3	4.5
17	84.5	0.077	-22.270 0.10	3.2	3.1	0.3	4.5
17	85	0.076	-22.384 0.10	3.2	3.1	0.2	4.5
17	85.5	0.076	-22.384 0.10	3.2	3.1	0.2	4.5
17	86	0.076	-22.384 0.10	3.2	3.1	0.2	4.5
17	86.5	0.075	-22.499 0.10	3.1	3	0.1	4.6
17	87	0.075	-22.499 0.10	3.1	3	0.1	4.6
17	87.5	0.075	-22.499 0.10	3.1	3	0.1	4.6
17	88	0.075	-22.499 0.10	3.1	3	0.1	4.6
17	88.5	0.009	-40.915 0.00	0.3	0.2	0	7.4
17	89	0.009	-40.915 0.00	0.3	0.2	0	7.4
17	89.5	0.009	-40.915 0.00	0.3	0.2	0	7.4