

Section 73.215 Compliance

The proposed facility meets all minimum distance separation requirements with regard to co-channel, first, second, and third adjacent channel authorizations including those separated by 53/54 channels (see Exhibit 30) with the exception of the following station:

KWCA (LIC) CH 266 C2 (73.215 station)
Palo Cedro, CA
4.9 kW ERP
450 M HAAT
40 39 15 / 122 31 12

| | |
|-------------------------|-----------|
| Separation distance | 183.55 km |
| Required 73.207 spacing | 190 km |
| Margin | -5.95 km |

This application proposes contour protection to KWCA in accordance with the guidelines of Section 73.215. The minimum spacing requirements of Section 73.215(e) have been met as follows:

| | |
|-------------------------|-----------|
| Separation distance | 183.55 km |
| Required 73.215 spacing | 177 km |
| Margin | 6.55 km |

KWCA is a 73.215 station. In accordance with Section 73.215(iii), contour protection to KWCA is based on its authorized ERP and height (It should be noted that KWCA's ERP of 4.9 kW and HAAT of 450 m is equivalent to a full Class C2 facility). Based on this, KLMD's proposed facility will not have any prohibited contour overlap with KWCA as is shown on the below map.



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A theoretical allotment site has been identified that meets the Class C2 full spacing requirements of Section 73.207(b) . The allotment site provides a 70 dBu contour that encompasses the community of license of Talent, OR (see Exhibit 28).

Allocation Study for Theoretical Allotment Site

| CH 266 C2 | | 42 21 38 / 122 48 38 | | 50 kW / 150 M HAAT | | Site AMSL 600 M / COR AMSL 739 M | | |
|-----------|-------|----------------------|------------|--------------------|-------|----------------------------------|-------|--------|
| Call | | Channel | Location | | Azi | Dist | FCC | Margin |
| KLKF | CP | 264C3 | Malin | OR | 106.4 | 101.57 | 55.5 | 46.1 |
| KSKR-FM | CP | 265C3 | Sutherlin | OR | 338.7 | 120.81 | 116.5 | 4.3 |
| KWCA | LIC-N | 266C2 | Palo Cedro | CA | 172.6 | 191.06 | 189.5 | 1.6 |
| KSKR-FM | LIC | 266C3 | Sutherlin | OR | 338.7 | 120.81 | 176.5 | -55.7 |

KLMD BPH-20120210AAH application (CP granted, License to Cover application filed) was filed contingent to KSKR-FM's filing for a change from CH 266 to CH 265. KSKR-FM now has a CP on CH 265, therefore, KSKR-FM on CH 266 is not being considered in this allocation study.

Theoretical Allotment Site

