

Exhibit 8: Engineering Exhibit

Proposed minor change to KQRP-LP Salida, CA.

Overview

The applicant, Fellowship of The Earth (“FOTE”), has operated KQRP-LP Salida, CA as a community radio station since May 2005. FOTE is requesting a channel change due to encroachment and interference concerns. The Commission has previously granted LPFM channel changes if another channel is open that will provide for less overall interference.

Current Situation

KQRP-LP is licensed to channel 291. The table below outlines the facility’s current spacing:

REFERENCE					DISPLAY DATES			
37 42 35.0 N.		CLASS = L1			DATA	06-02-10		
121 05 41.0 W.		Current Spacings to 3rd Adj.			SEARCH	06-20-10		
----- Channel 291 - 106.1 MHz -----								
Call	Channel		Location		Azi	Dist	FCC	Margin
KQRP-LP	LIC	291L1	Salida	CA	0.0	0.0	23.5	-23.5
K290BF	LIC	290D	Modesto	CA	131.2	11.4	14.5	-3.1
KVVF	LIC	289B	Santa Clara	CA	236.4	70.2	66.5	3.7
KMEL	LIC	291B	San Francisco	CA	269.3	118.4	111.5	6.9
KGAM	LIC-Z	292A	Merced	CA	118.4	65.8	55.5	10.3
AL0915	VAC	294A	Waterford	CA	95.8	40.3	28.5	11.8
KRVR	LIC	288A	Copperopolis	CA	52.1	43.4	28.5	14.9
KEZR	LIC-D	293B	San Jose	CA	227.3	81.9	66.5	15.4
K290AG	LIC	290D	Stockton	CA	328.4	32.2	14.5	17.7
1358202	APP-Z	238A	Westley	CA	228.6	24.1	5.5	18.6
1358469	APP-Z	238A	Westley	CA	205.4	26.7	5.5	21.2
1360195	APP-Z	238A	Westley	CA	205.6	26.7	5.5	21.2
1358380	APP-Z	238A	Westley	CA	205.4	26.7	5.5	21.2
KCFA	LIC	291B1	Arnold	CA	46.5	108.5	86.5	22.0
1357612	APP	238A	Westley	CA	198.0	27.8	5.5	22.3
VA5156	VAC	238A	Westley	CA	197.0	27.8	5.5	22.3
1357734	APP	238A	Westley	CA	197.2	27.9	5.5	22.4
1354928	APP-N	238A	Westley	CA	189.4	33.1	5.5	27.6
1358327	APP-Z	238A	Westley	CA	189.4	33.1	5.5	27.6
K238AC	LIC-D	238D	Salida	CA	227.8	33.3	4.5	28.8
KBZC	LIC	293B	Sacramento	CA	0.2	103.4	66.5	36.9

Figure 1: KQRP-LP spacing

K290BF: As seen above, the facility is short spaced to a first adjacent translator, K290BF, which went on the air September 2007 (See Figure 2). KQRP-LP now suffers from discernable interference attestable from listeners to the south due to this new facility.

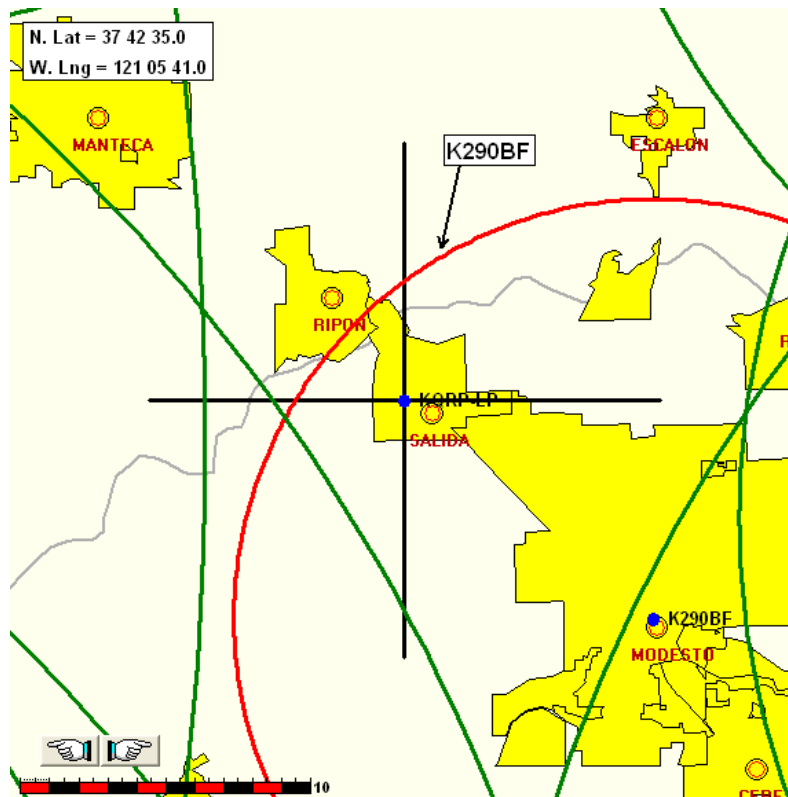


Figure 2: K290BF spacing to KQRP-LP

KMEL: Although KQRP-LP meets the spacing requirements to KMEL, it receives more than the intended interference from KMEL (see Figures 3 & 4), and additionally causes interference to KMEL (see Figure 5). Although LPFM facilities are not protected from incoming interference, the current situation is atypical. KMEL is a grandfathered Class B facility operating at 69 kW at 393 m HAAT. The normal Class B ceiling is 50 kW at 150 m HAAT. Even though full spacing is met, the two facilities interfere with each other outside the intended interference bounds.

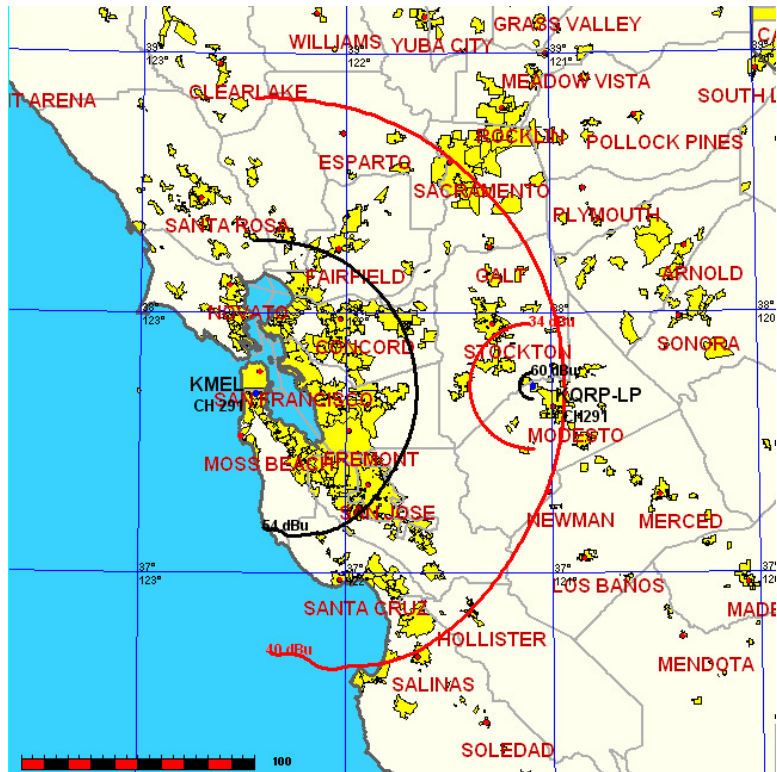


Figure 3: The above shows if KMEL was a “typical” Class B facility following maximum Class B power and HAAT.

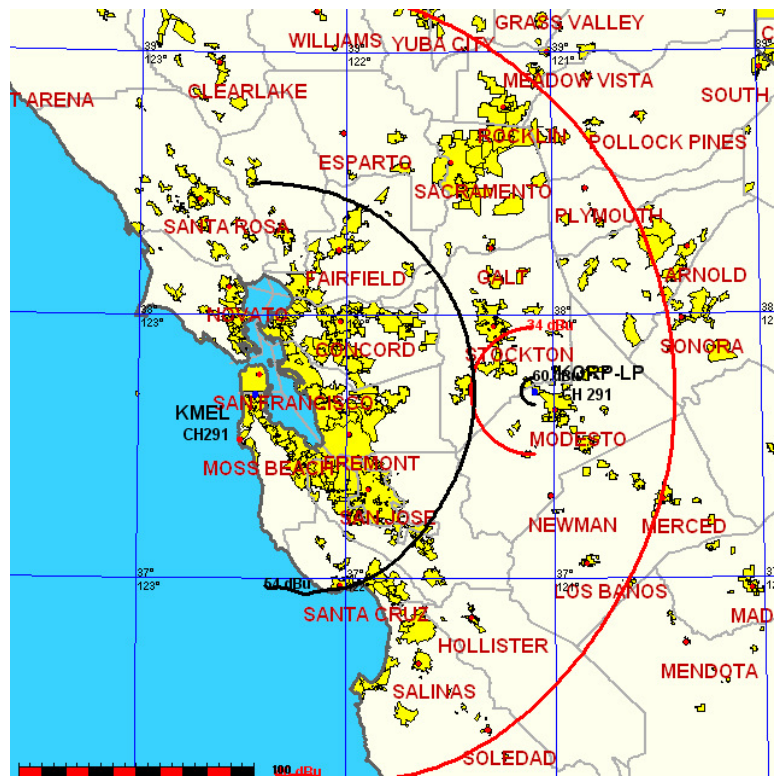


Figure 4: KMEL vs. KQRP-LP actual

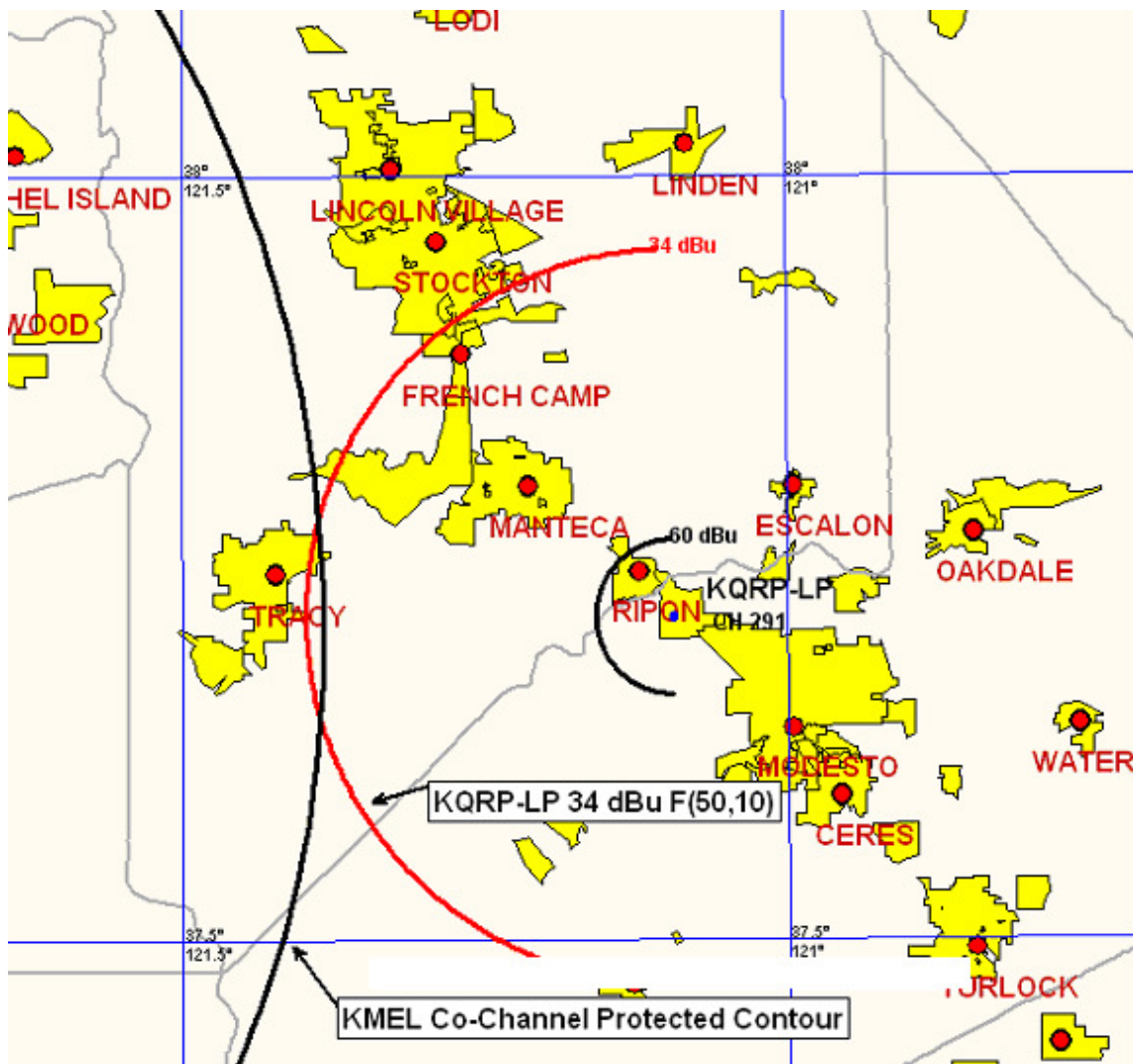


Figure 5: KQRP-LP with interference to KMEL in Tracy, CA.

Proposed

KQRP-LP proposes moving to channel 285 to minimize all cases of interference. Figure 6 demonstrates the LPFM spacing.

REFERENCE							DISPLAY DATES
37 42 35.0 N.			CLASS = L1				DATA 06-02-10
121 05 41.0 W.			Current Spacings to 3rd Adj.				SEARCH 06-20-10
----- Channel 285 - 104.9 MHz -----							

Call	Channel	Location		Azi	Dist	FCC	Margin
KHTN	LIC-Z 284B	Planada	CA	101.5	96.1	96.5	-0.44
KCNL	LIC 285A	Sunnyvale	CA	233.7	72.4	66.5	5.9
KNCI	LIC 286B	Sacramento	CA	0.2	103.5	96.5	7.0
KRVR	LIC 288A	Copperopolis	CA	52.1	43.4	28.5	14.9

Figure 6: Proposed LPFM Spacing, Channel 285

The proposed is actually 0.94 km short of full spacing with respect to KHTN (0.44 km, taking into account 0.5 km rounds down to fully spaced). See Figure 7.

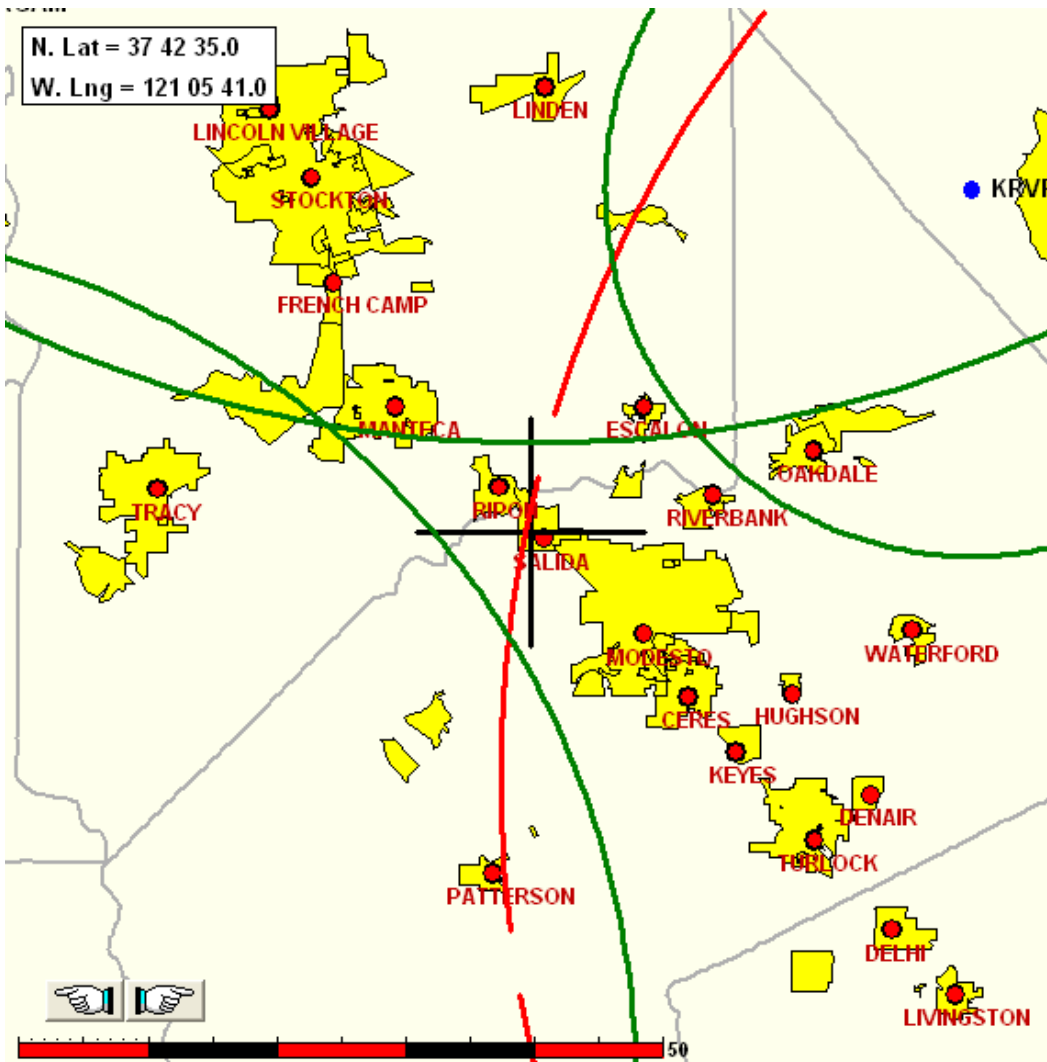


Figure 7: KQRP-LP Proposed

The facility cannot be moved 0.44 km to the west because the facility is already at the edge of town, across the street from a field (see Figure 8).

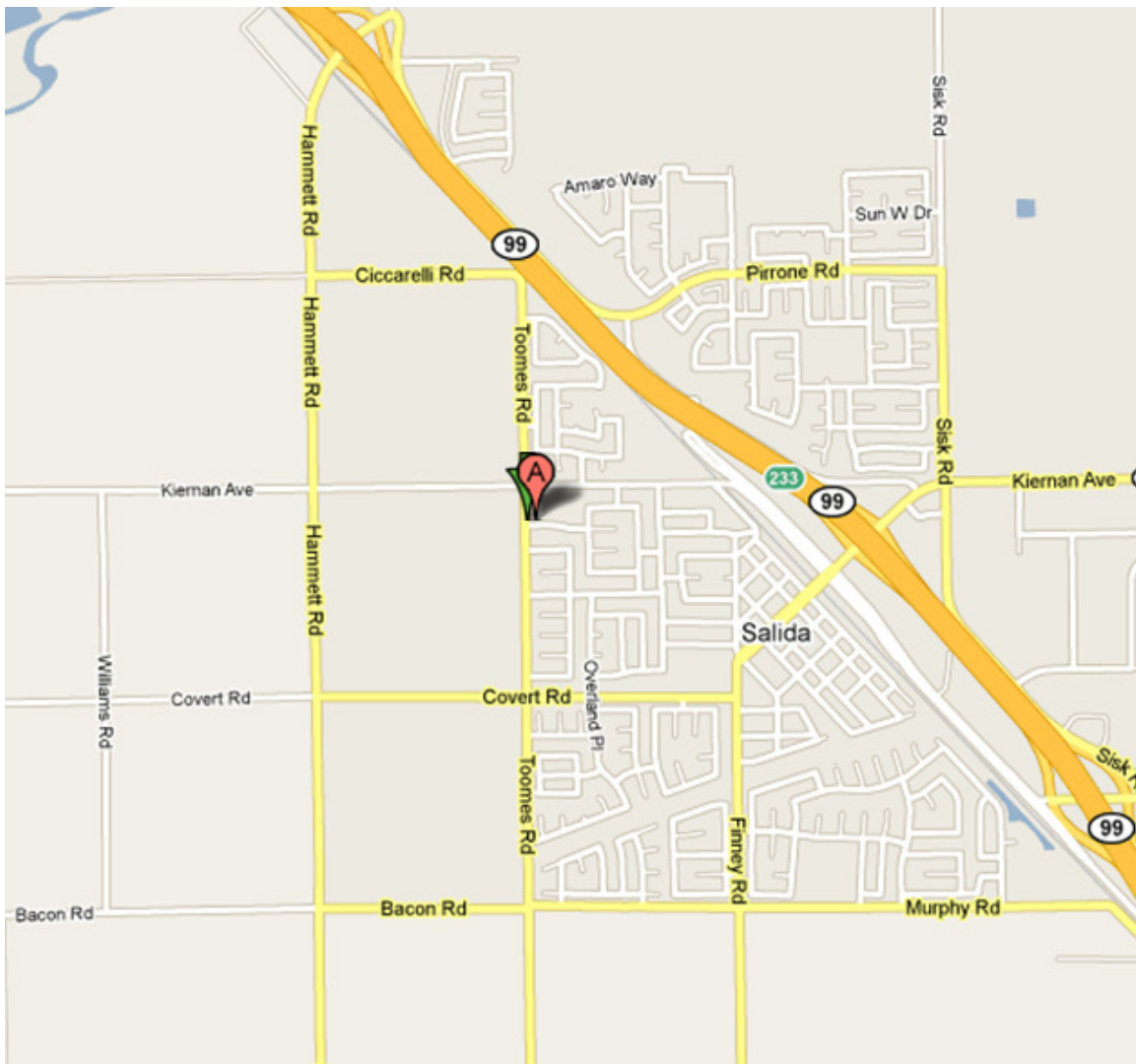


Figure 8: Salida, CA

The proposed, however, provides no interference to KHTN on a contour basis. Just as short spaced commercial stations, the showing in Figure 9 provides a compelling case for licensing.

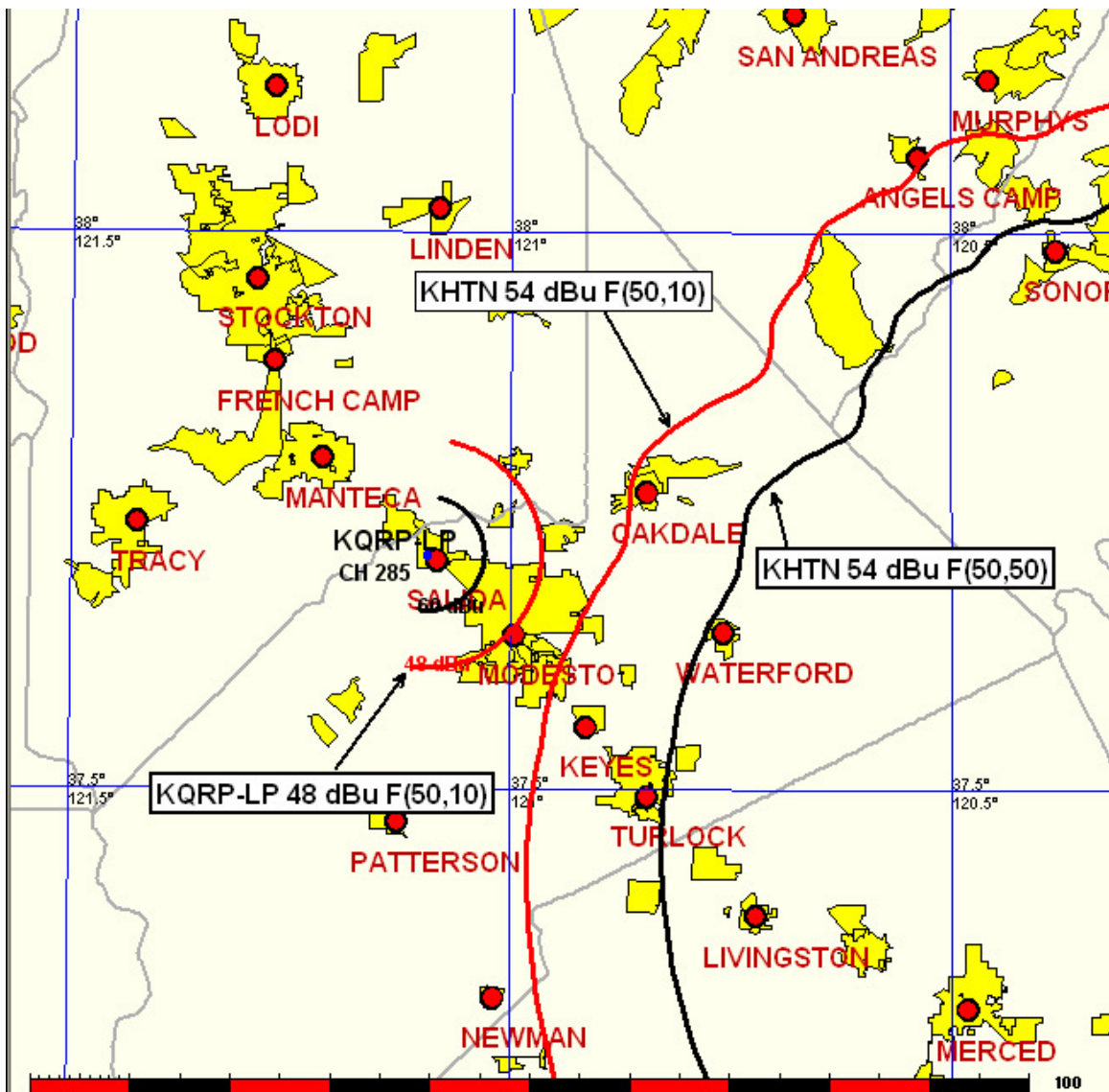


Figure 9: First adjacent interference using contours.

Conclusion

KQRP-LP is in a situation where it is short spaced to a licensed translator. It is additionally fully spaced to a grandfathered Class B station in which both facilities interfere with each other. KQRP-LP desires to remedy this situation by moving to a channel that would relieve all interference problems. FOTE therefore asks the Commission for a waiver of the rules in order to accommodate this request. In this unique situation, the proposed channel, although 0.44 km short of normal full spaced licensing to KHTN, provides for full interference protection to KHTN on a contour basis. The applicant believes it would be in the public interest to restore full interference-free coverage to KMEL, and superior coverage for KQRP-LP within its 60 dBu contour.