

Section 74.1204 - Statement of Compliance
Minor Amendment to AM Revitalization 250-Mile Window Application
FCC File No. BMPFT-20160729ALG
K239CD, Lahaina, HI to Honolulu, HI, Channel 232
FM Translator Facility ID. 142632
February, 2017

The Applicant proposes a minor amendment to the above-referenced, non-reserved band, FM translator application for Modification of Construction Permit. Specifically, the applicant proposed herein to relocate and decrease power and antenna height. No further changes are proposed herein. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel stations KUBT(FM), Honolulu, HI (Channel 230C1) and KUMU-FM, Honolulu, HI (Channel 234C1) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of the second-adjacent channel, full service stations listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator's proposed transmitter site, KUMU-FM is predicted to produce an F(50,50) signal strength of 103 dBu while KUBT(FM) is predicted to produce an F(50,50) signal strength of 130 dBu. Therefore, KUMU-FM provides for a worst-case interference analysis.

The proposed FM translator antenna will be pole mounted atop a building such that it is located 6 meters above roof level and 19 meters above ground level. In the vicinity of this antenna, the translator's relevant interfering contour is the 143 dBu contour relative to KUMU(FM). According to free space calculations, the translator's worst-case predicted 143 dBu interfering contour will extend, at most, 2.5 meters from the proposed antenna and will be wholly contained above roof level (See the attached Table and also Exhibit 2). Therefore, the predicted interference area will cause no interference to any population served by KUBT(FM) or by KUMU-FM.

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been “demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable”.

Section 74.1204 CoChannel Contour Overlap Study

Amended Exhibit 1 February, 2017

Key to Stations on Map

- AMEND.232D.FAC.ID.142632
- KDLX.CH.232C1.FAC.ID.14699
- KZZV.CP.CH.232C1.FAC.ID.189523

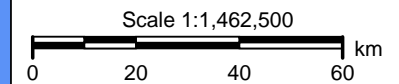
AMEND.232D.FAC.ID.142632

Honolulu, HI
Latitude: 21-19-45 N
Longitude: 157-52-19 W
ERP: 0.025 kW
Channel: 232
Frequency: 94.3 MHz
AMSL Height: 23.0 m
Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):
40 dBu F(50,10) to Class A & FX & LPFM
37 dBu F(50,10) to Class B1 FM Station
34 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):
Class A & FX & LPFM = 60 dBu F(50,50)
Class B1 FM Station = 57 dBu F(50,50)
Class B FM Station = 54 dBu F(50,50)



K239CD.232**Honolulu, HI (Facility ID 142632)****ERP 25.00 WATTS**

Maximum ERP *Interfering contour value ----->* **143** dBu
 0.025 kW *RCAGL (m)----->* **19** meters
 Antenna Type -----> **7**

Antenna Type 7 = **Nicom, BKG77, one bay**

Angle Below Horizontal (degrees)	Vertical Pattern (REL. FIELD)	K239CD.232 ERP (kW)	K239CD.232 ERP (dBk)	K239CD.232 Free-Space Distance to interfering contour (meters)	Slant Distance (meters) *	Height of interfering contour above ground (feet)**	Proposed Interference within 30 ' of ground level?	Horizontal Distance (meters) ***	Horizontal Distance (feet) ***
0	1.000	0.0250	-16.021	2.5	N/A	62.3			8.1
5	0.999	0.0250	-16.029	2.5	113.6	61.6	No	2.5	8.1
10	0.982	0.0241	-16.178	2.4	57.0	61.0	No	2.4	7.9
15	0.954	0.0228	-16.430	2.4	38.3	60.3	No	2.3	7.5
20	0.918	0.0211	-16.764	2.3	28.9	59.8	No	2.1	7.0
25	0.872	0.0190	-17.210	2.2	23.4	59.3	No	2.0	6.4
30	0.818	0.0167	-17.766	2.0	19.8	59.0	No	1.8	5.8
35	0.758	0.0144	-18.427	1.9	17.3	58.8	No	1.5	5.0
40	0.691	0.0119	-19.231	1.7	15.4	58.7	No	1.3	4.3
45	0.616	0.0095	-20.229	1.5	14.0	58.8	No	1.1	3.5
50	0.538	0.0072	-21.405	1.3	12.9	59.0	No	0.9	2.8
55	0.465	0.0054	-22.672	1.2	12.1	59.2	No	0.7	2.2
60	0.391	0.0038	-24.177	1.0	11.4	59.6	No	0.5	1.6
65	0.313	0.0024	-26.110	0.8	10.9	60.0	No	0.3	1.1
70	0.239	0.0014	-28.453	0.6	10.5	60.5	No	0.2	0.7
75	0.176	0.0008	-31.110	0.4	10.2	61.0	No	0.1	0.4
80	0.129	0.0004	-33.809	0.3	10.1	61.3	No	0.1	0.2
85	0.103	0.0003	-35.764	0.3	9.9	61.5	No	0.0	0.1
90	0.105	0.0003	-35.597	0.3	9.9	61.5	No	0.0	0.0

* Slant distance from antenna center of radiation to location 30 feet (9.1 meters) above ground level at angle below horizontal.

** A negative number indicates that the interfering contour is predicted to reach ground level. If a negative number is present, the interfering contour reaches ground level at the "Horizontal Distance" described below.

*** Horizontal distance from tower base to interfering contour at the indicated height above ground level. If a negative height above ground level is indicated, this horizontal distance is the distance from the tower base to the interfering contour. This horizontal distance is only relevant if the proposed interference is predicted to occur within 30 feet of ground level.



Rooftop FM Translator Antenna Placement
Salem Media of Hawaii, Inc.
1160 N. King St. Honolulu, Hawaii
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