

Engineering Statement Regarding Second &/or Third Adjacent Channel Interference With Additional Comments regarding Co-Channel Interference

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

In this case, KCCY and KIBT are thus affected. In both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

KCCY has a signal in the area of the proposed FMT of 99.1 dBu. Thus using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules, the proposed 139.1 dBu interference contour would be the area of possible interference. That area extends 0.6 meters from the proposed FMT site, and that area is fenced off, unpopulated and uninhabited.

Similarly KIBT has a signal in the area of the proposed FMT of 76.8 dBu, and as outlined above, the area affected by the proposed FMT (116.8 dBu interference contour) extends 48.3 meters from the proposed FMT site, and that area is fenced off, unpopulated and uninhabited.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed or possible areas of interference are uninhabited and/or unpopulated and thus will there not be caused any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of undesirable to desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Minor Change to K243AM

REFERENCE		CH# 243D - 96.5 MHz, Pwr= 0.023 kW, HAAT=0.0 M, COR= 2213 M								DISPLAY DATES	
38 53 10 N		Average Protected F(50-50)= 3.87 km								DATA 07-01-06	
104 53 24 W		Ave. F(50-10) 40 dBu= 12.4 54 dBu= 5.5 80 dBu= 1.6 100 dBu= .3								SEARCH 07-02-06	
CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT* (in km)	
245C Pueblo	KCCY	LIC CO	CY 171.0 351.0	15.83 BLH19940217KC	38 44 43 104 51 41	72.000 944	2946 15.4	100.3 Capstar Tx	-3.29<	-84.58*<	
243C Evergreen	ALLO	USE CO	338.0 158.0	81.78	39 34 06 105 14 50	100.000 289	2724 170.9	71.5	-90.69<	6.51<	
243C Evergreen	KXPK	LIC CO	CN 329.9 149.9	101.69 BLH19940701KC	39 40 35 105 29 09	100.000 685	3281 203.2	95.1 Entravi sion	-103.01<	1.80 Holdi ngs, LI c	
243D Colorado Springs	K243AM	CP CO	DC 170.8 350.8	15.84 BNPFT20030808ADH	38 44 43 104 51 39	0.000 721	2718 0.0	0.0 Educational	12.06<	3.88< Communi cations	
241C2 Fountain	KIBT	LIC CO	NCX 171.1 351.1	15.80 BLH20060503AAK	38 44 44 104 51 42	0.460 869	2872 1.5	45.5 Amfm Texas	10.54	-29.88*< Li mite	
245C Pueblo	ALLO	USE CO	119.7 299.7	65.60	38 35 33 104 14 07	100.000 1054	2724 18.3	107.1	34.08	-41.79*<	
Coordinates updated from CP record				BPH830418AD							
241C2 Fountain	ALLO	USE CO	150.4 330.4	32.63	38 37 50 104 42 16	50.000 971	2724 12.7	96.6	8.13	-64.26*<	
240D Cripple Creek	K240CH	LIC CO	DCN 238.3 58.3	29.25 BLFT19940314TE	38 44 52 105 10 36	0.006 -453	2908 0.2	2.8 Superior	27.47	26.44 Broadcasti ng Of D	
Translator for KKCSFM, Colorado Springs, CO. -											
241D Lakewood	AP241	APP CO	DE 346.3 166.3	57.03 BNPFT20030312ALH	39 23 06 105 02 51	0.000 255	2352 0.0	0.0 Educational	55.42	57.01 Communi cations	
241D Ponderosa Park	AP241	APP CO	C 18.8 198.8	62.74 BNPFT20030310AXJ	39 25 14 104 39 15	0.050 67	2090 0.5	7.0 Way-fm Medi a Group, Inc.	61.21	55.69	

ERP and HAAT are on direct line to and from reference station.

"*"Affixed to 'IN' or 'Out' values = site inside protected contour. "<" = Contour Overlap

Terrain and Contour Study

N. Lat. = 38 53 10 W. Lng. = 104 53 24

HAAT and Distance to Contour - FCC Method - 30 Arc. Sec.

Minor Change to K243AM

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5	40-F1	116.8-F1
000	2187.4	25.6	0.0000	-44.61	0.039	1.31	2.46	0.00
030	2011.7	201.3	0.0000	-43.92	0.042	1.41	6.47	0.00
060	1998.6	214.4	0.0065	-21.84	0.534	7.60	25.75	0.03
090	1951.1	261.9	0.0187	-17.28	0.902	11.06	36.93	0.04
120	1869.0	344.0	0.0222	-16.53	0.983	13.19	44.24	0.05
150	1844.2	368.8	0.0125	-19.02	0.738	11.84	40.07	0.04
180	2186.4	26.6	0.0012	-29.25	0.227	1.90	5.88	0.01
210	2795.3	-582.3	0.0000	-46.39	0.032	1.06	2.24	0.00
240	2934.6	-721.6	0.0001	-40.65	0.061	1.61	3.03	0.00
270	2743.9	-530.9	0.0012	-29.24	0.228	1.90	5.89	0.01
300	2573.6	-360.6	0.0015	-28.35	0.252	2.00	6.20	0.01
330	2677.5	-464.5	0.0005	-32.63	0.154	1.53	4.82	0.01

Ave El= 2314.44 M HAAT= -101.44 M AMSL= 2213

K243AM (modified) vs KXPK

K243AM.C

BNPFT20030808ADH

Latitude: 38-53-10 N

Longitude: 104-53-24 W

ERP: 0.023 kW

Channel: 243

Frequency: 96.5 MHz

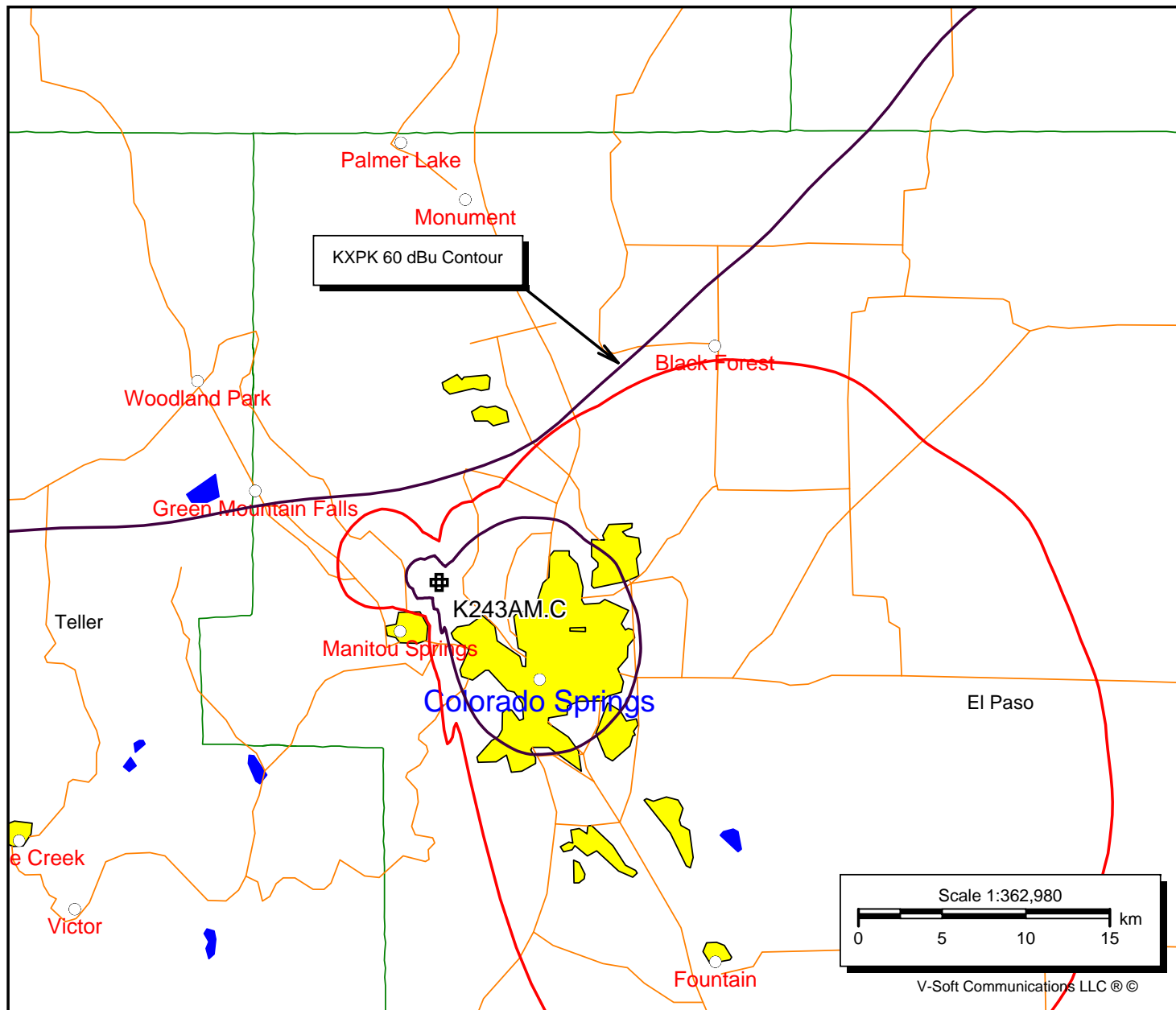
AMSL Height: 2213.0 m

Elevation: 2112.0 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None



Scale 1:362,980

0 5 10 15 km

V-Soft Communications LLC ©

KXPK BLH19940701KC
Channel = 243C
Max ERP = 100 kW
RCAMSL = 3281 M
N. Lat = 39 40 35
W. Lng = 105 29 09

K243AM
Channel = 243D
Max ERP = 0.023 kW
RCAMSL = 2213 M
N. Lat = 385310
W. Lng = 1045324

Protected
60 dBu

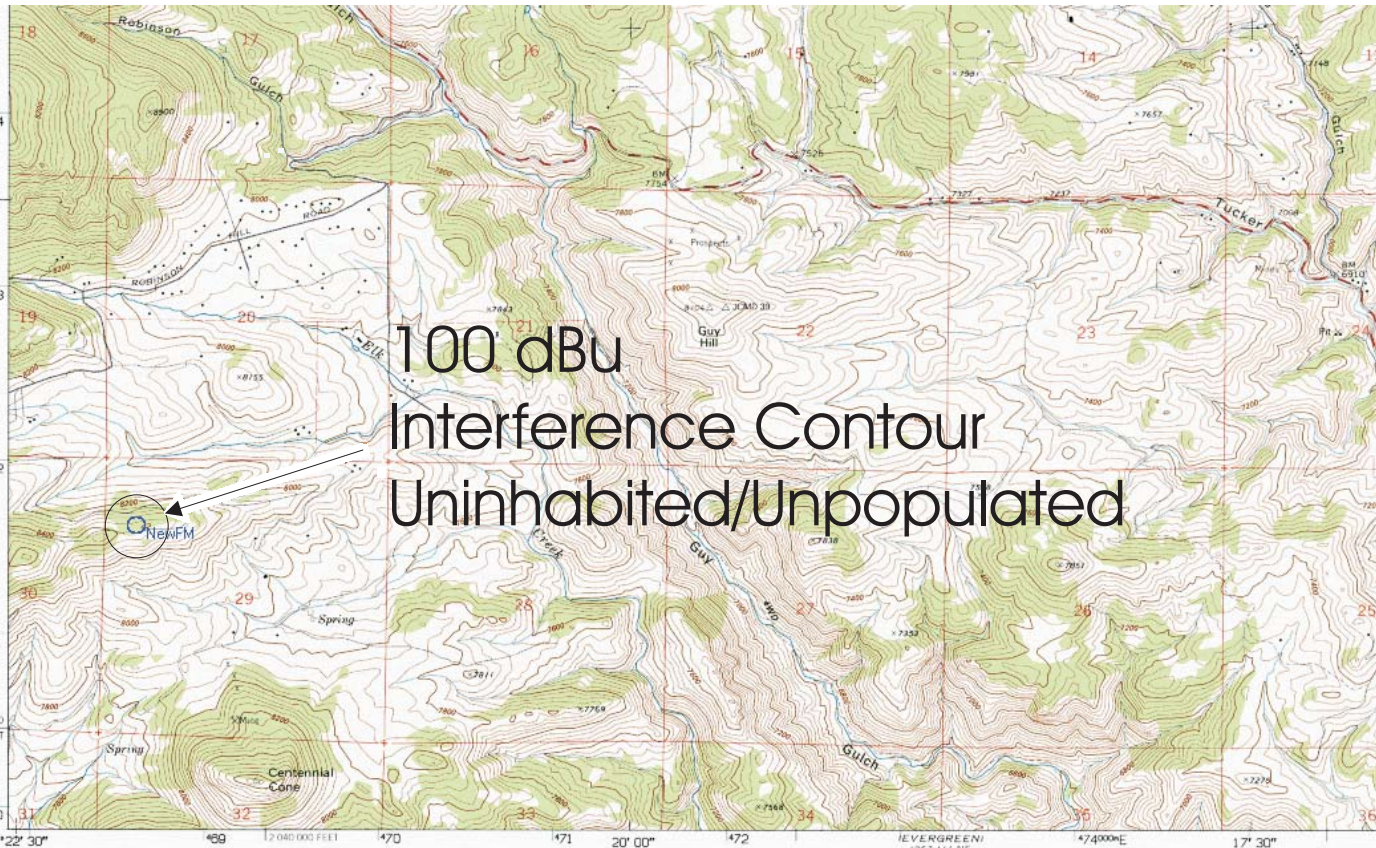
Interfering
40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
130.0	100.0000	0748.6	097.6	042.9	000.0010	0211.7	034.3	26.6
131.0	100.0000	0745.6	097.5	042.5	000.0009	0212.4	032.4	27.2
132.0	100.0000	0745.6	097.4	042.5	000.0009	0211.7	030.7	28.1
133.0	100.0000	0745.8	097.5	042.6	000.0009	0211.7	029.0	29.2
134.0	100.0000	0743.3	097.4	042.3	000.0009	0212.4	027.3	30.1
135.0	100.0000	0739.0	097.2	041.8	000.0008	0212.4	025.6	30.8
136.0	100.0000	0736.3	097.1	041.3	000.0007	0212.8	023.9	31.7
137.0	100.0000	0736.9	097.1	041.0	000.0007	0212.8	022.2	32.7
138.0	100.0000	0738.7	097.2	040.6	000.0006	0212.8	020.5	33.8
139.0	100.0000	0740.2	097.2	040.1	000.0006	0212.7	018.8	34.8
140.0	100.0000	0741.3	097.3	039.3	000.0005	0212.0	017.1	35.5
141.0	100.0000	0743.1	097.4	038.4	000.0004	0211.1	015.4	36.1
142.0	100.0000	0746.3	097.5	037.3	000.0003	0210.1	013.7	36.6
143.0	100.0000	0750.6	097.6	035.9	000.0002	0209.0	012.1	37.4
144.0	100.0000	0752.2	097.7	033.5	000.0001	0205.1	010.4	36.2
145.0	100.0000	0747.9	097.5	028.5	000.0000	0200.6	008.9	34.3
146.0	100.0000	0738.3	097.2	020.3	000.0000	0176.6	007.7	33.4
147.0	100.0000	0727.0	096.7	008.6	000.0000	0111.8	006.7	32.8
148.0	100.0000	0715.2	096.3	353.8	000.0000	-0116.6	006.1	25.1
149.0	100.0000	0701.6	095.7	337.4	000.0002	-0476.5	006.2	32.1
150.0	100.0000	0684.5	095.1	322.6	000.0009	-0482.1	006.8	36.3
151.0	100.0000	0665.3	094.3	311.5	000.0013	-0541.2	007.9	35.1
152.0	100.0000	0646.8	093.6	303.5	000.0014	-0410.2	009.3	33.1
153.0	100.0000	0631.1	093.0	297.4	000.0015	-0341.1	010.6	30.9
154.0	100.0000	0618.0	092.5	292.5	000.0015	-0319.0	012.0	28.8
155.0	100.0000	0607.2	092.1	288.6	000.0015	-0380.7	013.5	26.7
156.0	100.0000	0597.8	091.7	285.4	000.0015	-0402.7	014.9	24.8
157.0	100.0000	0588.0	091.4	282.9	000.0014	-0402.8	016.4	23.4
158.0	100.0000	0577.5	090.9	281.1	000.0014	-0406.4	018.0	22.0
159.0	100.0000	0565.8	090.4	279.9	000.0014	-0411.4	019.6	20.7
160.0	100.0000	0554.4	089.9	279.0	000.0014	-0417.3	021.2	19.3

EXHIBIT 12b

Demonstration of No Population in 100 dBu Interference Contour

100 dBu
Interference Contour
Uninhabited/Unpopulated



Produced by the United States Geological Survey
Control by USGS and NOS/NOAA

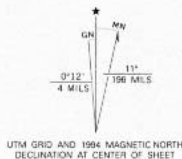
Compiled from aerial photographs taken 1964. Field checked 1965.
Revised from aerial photographs taken 1988 and 1990 and other
sources. Map edited 1994. Contours and land elevations have
not been revised and may conflict with other content.

North American Datum of 1927 (NAD 27). Projection and
blue 1000-meter Universal Transverse Mercator ticks, zone 13
10 000-foot ticks: Colorado Coordinate System, central zone.

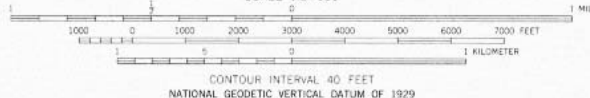
North American Datum of 1983 (NAD 83) is shown by dashed
corner ticks. The values of the shift between NAD 27 and NAD 83
for 7.5-minute intersections are obtainable from National Geodetic
Survey NADCON software.

There may be private inholdings within the boundaries of the
National or State reservations shown on this map.

Fine red dashed lines indicate selected fence and field lines where
generally visible on aerial photographs. This information is unchecked.



UTM GRID AND 1994 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



CONTOUR INTERVAL 40 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Present vs. Proposed Service Contours

