

**PROPOSED BIFURCATION OF LPFM MX GROUP NO. 295
ALLOWING FOR TWO SINGLETON GRANTS**

The applicants Cascade Community Radio and Tool Shed PDX (“Applicants”) are the parties that make up LPFM MX Group 295:¹

Line	MX	ST	City	CH Applicant	File	Fac ID
1203	295	OR	Portland 268	Cascade Community Radio	20131114BUM	196380
1204	295	OR	Portland 268	Tool Shed PDX	20131114BUU	195722

Applicants propose a novel method of solving the mutually exclusive filing. Both applicants would like to use the same radio channel. However, instead of proposing a “share time”, the applicants propose two separate facilities because the groups are located in different areas of Portland. Applicants propose bifurcating the MX by providing simultaneously-filed minor amendment to space two facilities by a distance of 24 kilometers to permit two different singleton grants. The arrangement requires Fac. No. 196380 to amend its coordinates to move 7.5 miles, and Fac. No. 195722 to move 9.6 miles to make the arrangement possible (>3.5 miles). The applicants respectfully request the move via two simultaneously-filed applications for a number of reasons:

- The Public Notice (DA 13-2397) states “relocation amendments of more than 5.6 (3.5 miles) kilometers will be permitted... for time-share proponents.” Applicants would like to work together on a co-channel, but desire to serve different neighborhoods. The resolution is in the spirit of a co-channel share-time, but allow independent facilities to be licensed on one channel. If any waiver request is required, Applicants respectfully request that here. In the past, the Commission has granted waivers of §73.870(a) if the move was justifiable within circumstances of limited options.²
- The proposal permits expedient dissolving of LPFM MX Group 295 so the FCC does not need to assist in intervening, streamlining legal paperwork. Applicants are not proposing channel changes, and would like to expedite construction to serve their respective city regions.
- The proposal conserves the use of radio channels via compact co-channel spacing.
- The proposal allows for maximizing local community radio service for not one, but two communities. Double the local programming can be produced with increased local participation.
- Applicants both propose “community radio” formats in which members of the public are allowed to volunteer and participate at community media centers.
- Applicants procured professional engineering services to competently demonstrate to the FCC proposed facilities comply with second-adjacent interference concerns and environmental factors.

¹ See Public Notice: “Media Bureau Identifies Mutually Exclusive Applications Filed in the LPFM Window and Announces 60-day Settlement Period; CDBS is Now Accepting Form 318 Amendments.” DA 13-2397, December 16, 2013.

² Example, LPFM Minor Modification File No. BPL-20080324AAN: 9.2 km move.

Applicants believe the arrangement is in the public interest. The proposal would allow immediate construction of new facilities to provide two new local non-commercial facilities—the first in Portland since decades.