

## **Broadcast Engineering Services of Bonny Doon, Inc.**

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### **Engineering Statement New AM translator Wailuku, Hawaii**

Pacific Radio Group, Inc. (PRE) is requesting a construction permit for a new fill-in translator for KMVI (AM), in accordance with the Revitalization of the AM Service, *Second Report and Order, MB Docket 13-249*, FCC 17-14, Modified Rule Section 74.1201(g).

This will be a fill-in translator for co-owned KMVI(AM) Kahului, Hawai'i (BL-20130812ADJ - Facility ID 9678, a Class B AM facility). The proposed 60 dbu contour of this translator proposal is fully encompassed by the 25 miles radius limit around the KMVI (AM) tower. This translator is proposed to operate with 99 watts, utilizing a directional antenna. The proposed antenna site is just over 17.5 miles from the current licensed site of KMVI(AM), well within the 25 mile limitation. The city of license will be Kahului, Hawai'i. The proposed 60 dbu contour does not exceed the 25 mile radius from the KMVI(AM) tower at any azimuth.

An allocation study, attached to this engineering statement, reveals no conflicts with existing or proposed stations, except for full-power KQMY (FM) Paia (BLH-20021021ABG and BMLED-20170405ABD – Facility 9678). KQMY is 2<sup>nd</sup> adjacent to Ch 273, but the proposed 100DBU contour of this translator does not overlap any populated areas. The site itself is located atop Pu'u Niania, within state land, and far from populated areas. The attached 100 dbu contour maps show the area in question. Based upon these mitigating factors, the applicant respectfully requests a waiver of C.F.R. 74.1024(d) of the Commission's rules based on the fact that there is no population within the area of predicted overlap.

The proposed antenna system is an Scala CA5, a circularly polarized yagi periodic directional design. Because the proposed effective radiated power is less than 100 watts, this proposal is exempt from environmental processing. This site is fenced and isolated on closed state land, and not readily accessible by the general public.

Respectfully submitted,



Donald E. Mussell Jr. NCE-CBT  
Consulting Engineer  
October 9, 2018

Broadcast Engineering Services of Bonny Doon, Inc  
Don Mussell, Consulting Engineer

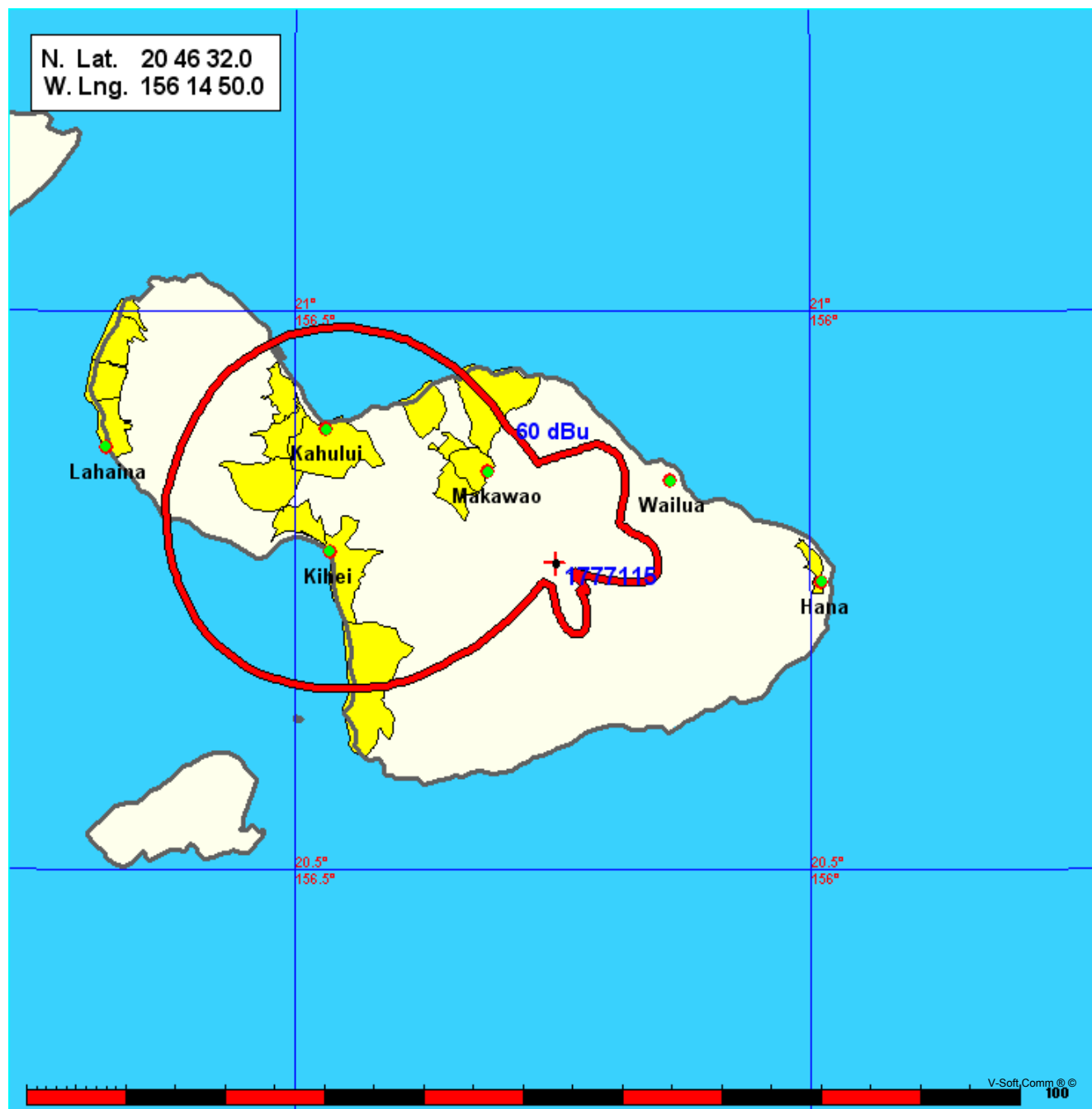
New Pacific Radio Group, Inc.										
REFERENCE	CH#	273D	-	102.5	MHz,	Pwr= 0.099 kW	DA, HAAT= 0.0 M,	COR= 2093 M	DISPLAY DATES	
20 46 32.0 N.							Average Protected F(50-50)= 5.62 km		DATA	10-02-18
156 14 50.0 W.							Standard Directional		SEARCH	10-09-18
CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR(kw)	INT(km)	PRO(km)	*IN*
CITY		STATE		<--	FILE #	LNG	HAAT(M)	COR(M)	LICENSEE	*OUT*
273D	1777115	APP DC_		0.0	0.00	20 46 32.0	0.099		---	Reference---
Kahului		HI		0.0	BNPFT20180130AIH	156 14 50.0		2093	Pacific Radio Group, Inc.	
271C1	KQMY	CP NCX		193.1	7.51	20 42 34.0	0.900	2.1	60.9	0.7
Paia		HI		13.0	BPH20171005ACF	156 15 49.0	1755	2985	Hochman Hawaii Four, Inc.	-53.5*
271C2	KQMY	LIC _CX		193.1	7.51	20 42 34.0	0.330	1.3	51.0	1.5
Paia		HI		13.0	BLED20170705AAH	156 15 49.0	1796	2993	Hochman Hawaii Four, Inc.	-43.6*
276C2	KFNZ	CP _HX		276.6	68.50	20 50 41.0	3.400	3.7	56.0	25.1
Kualapuu		HI		96.3	BMPH20180129AGS	156 54 04.0	511	700	Jackman Holding Company, L	11.6
274C	KDDB	LIC DEN		290.1	204.39	21 23 49.0	61.000	131.8	89.4	33.2
Waipahu		HI		109.4	BLH19881205KA	158 05 58.0	577	703	Ohana Broadcast Company L	55.5

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Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM  
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.  
All separation margins (if shown) include rounding.  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
"\*"affixed to 'IN' or 'OUT' values = site inside restricted contour.

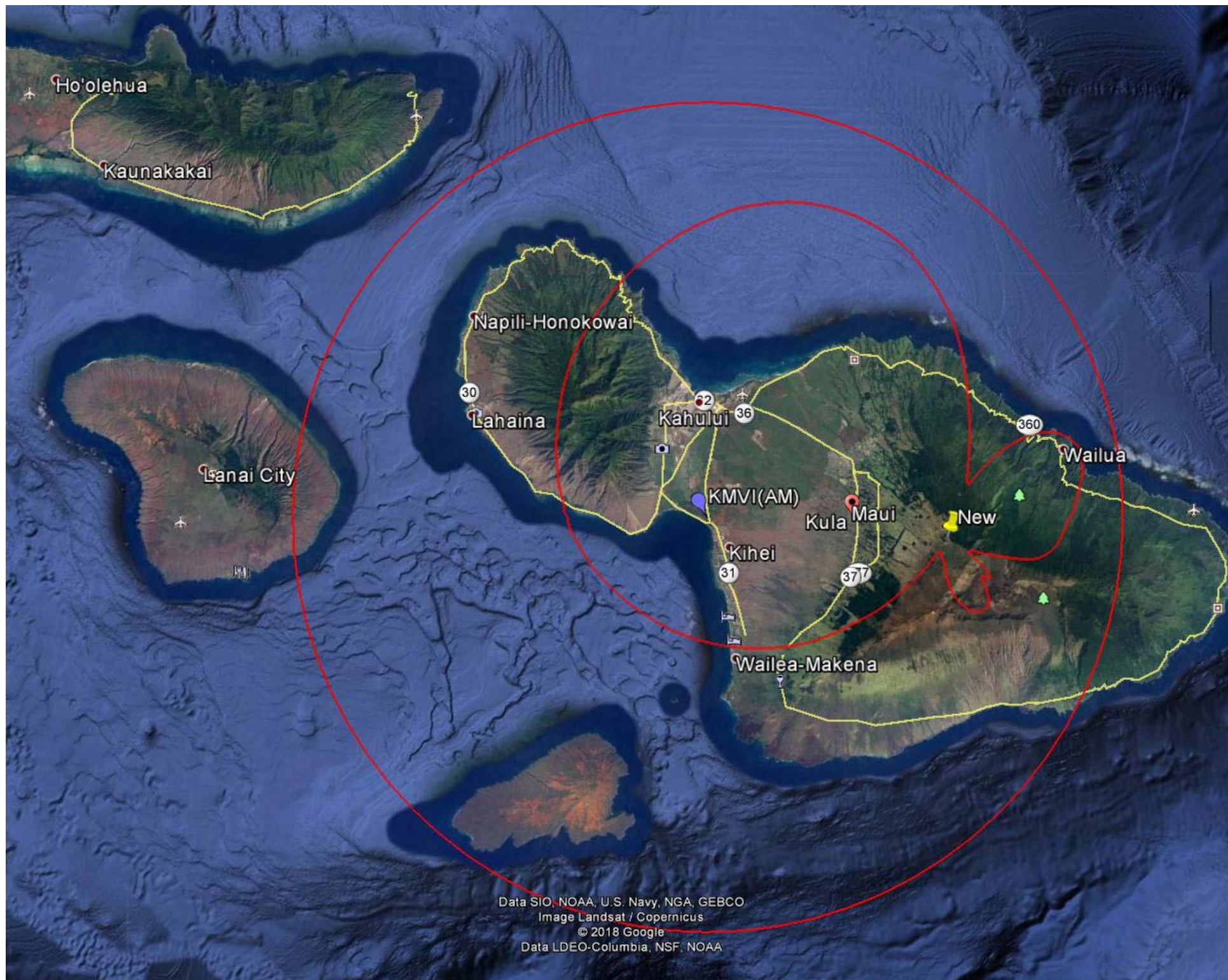
New  
Pacific Radio Group, Inc.

Coverage Study - FCC NGDC 30 Sec  
10-09-2018

1777115 CH273 D , 0.099 kW, 0.0m HAAT, 2093.0m COR AMSL  
Service Contour = 60 dBu. Population = 92,913







New - KQMY.C  
Pacific Radio Group, Inc.

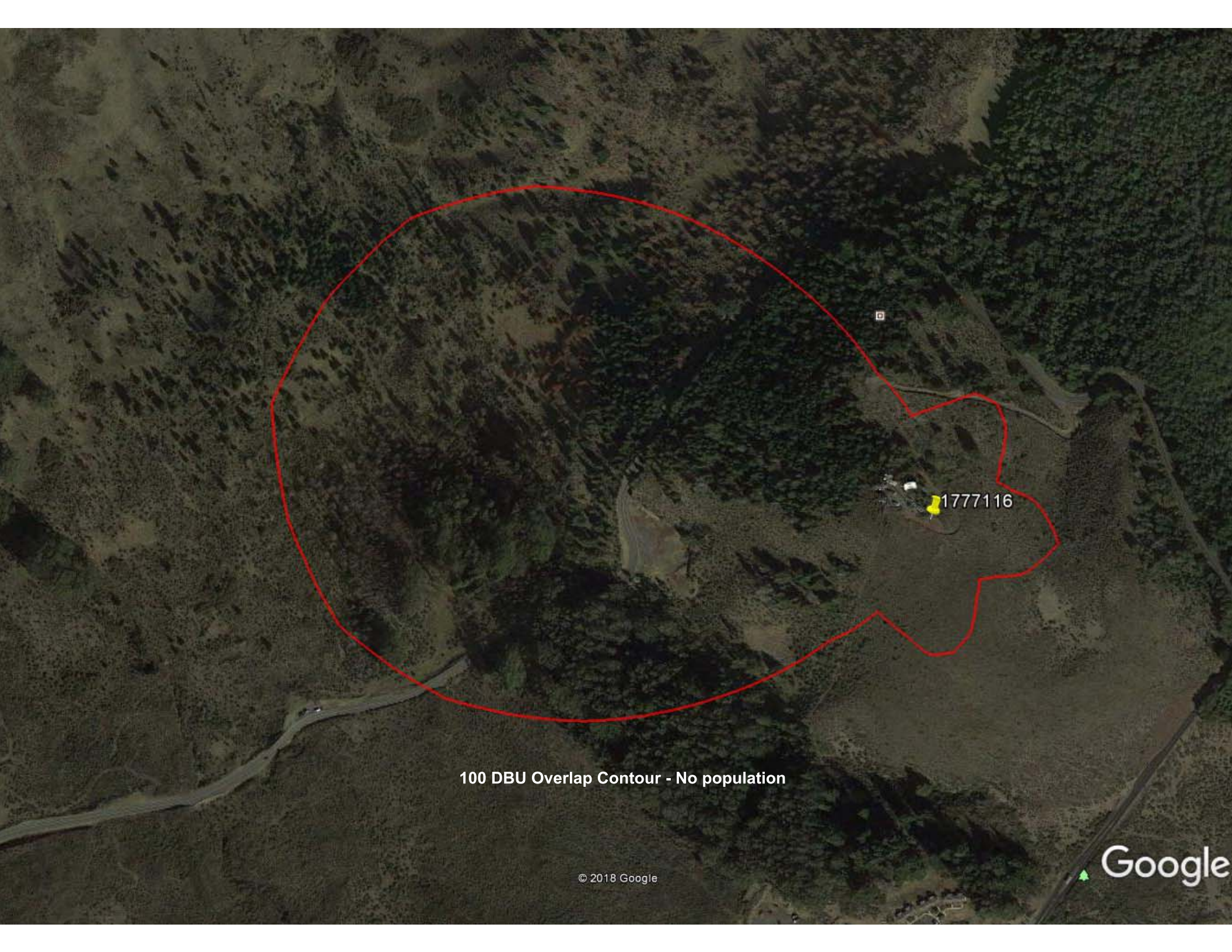
FMCommander Single Allocation Study - 10-09-2018 - FCC NGDC 30 Sec  
1777115's Overlaps (In= 0.7 km, Out= -53.51 km)

1777115 CH 273 D DA  
Lat= 20 46 32.0, Lng= 156 14 50.0  
0.099 kW 0 m HAAT, 2093 m COR  
Prot.= 60 dBu, Intef.= 100 dBu

KQMY-C CH 271 C1 73.215 N BPH20171005ACF  
Lat= 20 42 34.0, Lng= 156 15 49.0  
0.9 kW 1755 m HAAT, 2985 m COR  
Prot.= 60 dBu, Intef.= 100 dBu







100 DBU Overlap Contour - No population

State of Hawaii )  
Kilauea )  
County of Kauai )

That he declares, under penalty of perjury, that the foregoing engineering exhibits were prepared by him or under his direction and supervision; and that the statements contained therein are true and correct to the best of his belief and knowledge.

Donald E. Mussell Jr. NCE-CBT  
Consulting Engineer  
October 9, 2018