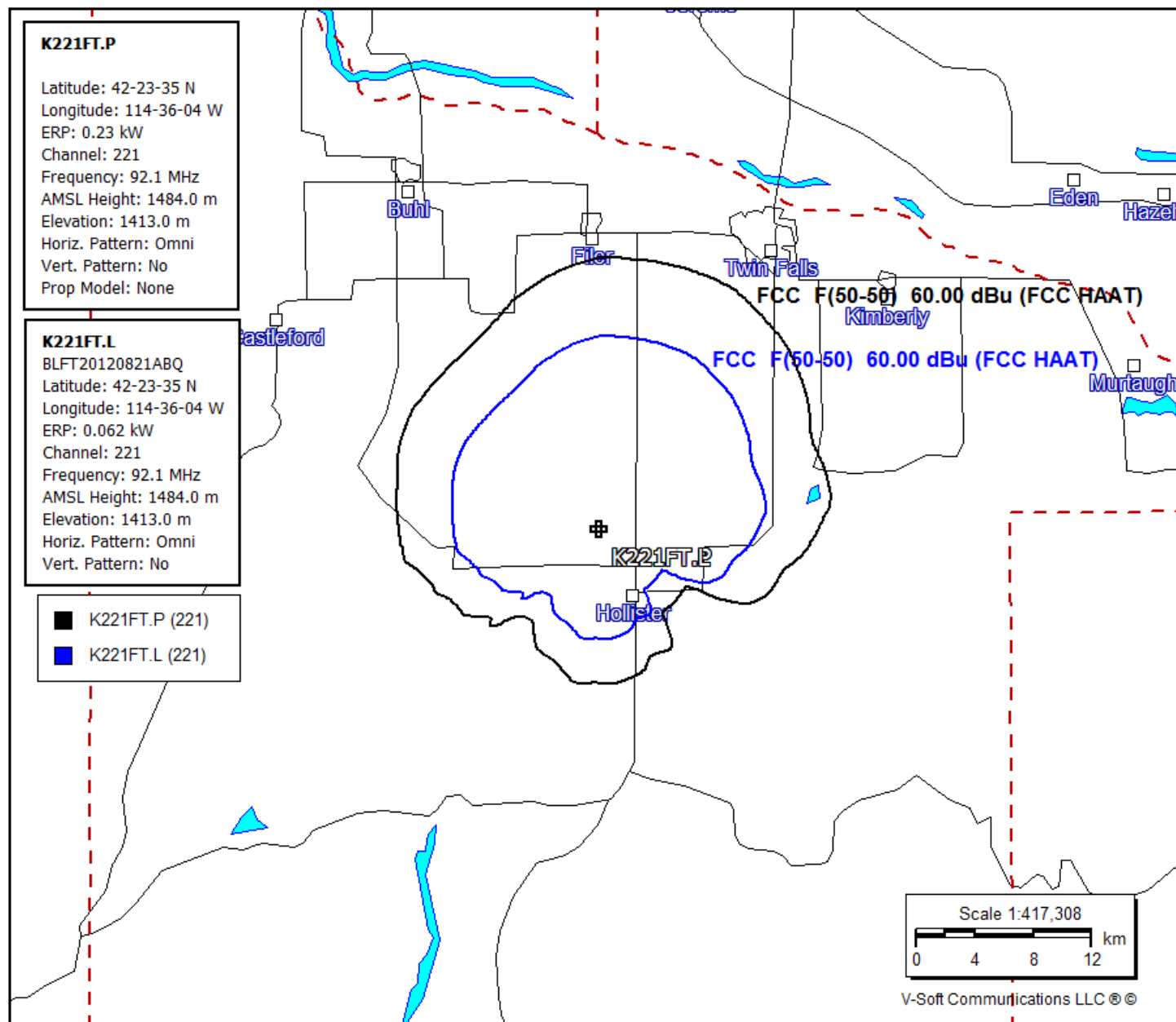


## Proposed Minor Change

Shown on the map below is the FCC F(50/50) 60dBu contour of the licensed and proposed facility of K221FT.



## Channel Study

| REFERENCE  |             | CH# 221D - 92.1 MHz, Pwr= 0.23 kW, HAAT= 117.5 M, COR= 1484 M |              |             |                 |              |                    |                   |                            | DISPLAY DATES           |        |
|--|-------------|---|--------------|-------------|-----------------|--------------|--------------------|-------------------|----------------------------|-------------------------|--------|
| 42 23 35.0 N.  |             | Average Protected F(50-50)= 13.6 km                           |              |             |                 |              |                    |                   |                            | DATA 03-18-14           |        |
| 114 36 04.0 W.   |             | Omni-directional  |              |             |                 |              |                    |                   |                            | SEARCH 03-18-14         |        |
| CH<br>CITY   | CALL        | TYPE  | ANT<br>STATE | AZI.<br><-- | DIST<br>FILE #  | LAT.<br>LNG. | Pwr(kW)<br>HAAT(M) | INT(km)<br>COR(M) | PRO(km)<br>LICENSEE        | *IN*<br>(Overlap in km) | *OUT*  |
| 221D<br>Filer  | K221FT      | LIC   | C            | 0.0         | 0.00            | 42 23 35.0   | 0.062              | 43.6              | 13.2                       | -62.1*                  | -71.0* |
|  |             |   | ID           | 0.0         | BLFT20120821ABQ | 114 36 04.0  | 118                | 1484              | Educational Media Foundati |                         |        |
| 221D<br>Filer  | K221FT      | CP  | C            | 33.6        | 20.66           | 42 32 52.0   | 0.099              | 27.1              | 5.6                        | -21.4*                  | -43.1  |
|  |             |   | ID           | 213.7       | BPFT20130328APX | 114 27 41.0  | 46                 | 1222              | Educational Media Foundati |                         |        |
| <b>224C1</b><br>Hazelton   | <b>KTPZ</b> | CP  | CX           | 21.7        | 40.52           | 42 43 54.0   | 100.000            | 9.7               | 70.5                       | 12.1                    | -31.1* |
|  |             |   | ID           | 201.8       | BPH20111003ABE  | 114 25 04.0  | 226                | 1398              | Locally Owned Radio, Llc   |                         |        |
| <b>224C3</b><br>Hazelton   | <b>KTPZ</b> | LIC   | CX           | 21.7        | 40.52           | 42 43 54.0   | 4.900              | 3.7               | 42.4                       | 18.1                    | -2.9*  |
|  |             |   | ID           | 201.8       | BLH20110804ABB  | 114 25 04.0  | 226                | 1398              | Locally Owned Radio, Llc   |                         |        |
| 219C3<br>Twin Falls  | KBSW        | LIC   | CN           | 21.7        | 40.34           | 42 43 48.0   | 4.500              | 3.3               | 36.6                       | 18.4                    | 2.7    |
|  |             |   | ID           | 201.8       | BLED19980820KB  | 114 25 06.0  | 150                | 1320              | Idaho State Board Of Educa |                         |        |
| 221C2<br>Pocatello   | KEGE        | LIC   | CX           | 71.9        | 178.93          | 42 52 26.0   | 12.000             | 138.9             | 58.6                       | 24.0                    | 69.0   |
|  |             |   | ID           | 253.3       | BMLH20120314ADS | 112 30 48.0  | 301                | 1808              | Rich Broadcasting Idaho Ls |                         |        |
| 220A<br>Burley   | KBWE        | LIC   | EX           | 75.0        | 72.40           | 42 33 32.0   | 4.900              | 22.3              | 14.9                       | 34.3                    | 33.8   |
|  |             |   | ID           | 255.5       | BLED20121030ABJ | 113 44 50.0  | 12                 | 1288              | Idaho Community Action Net |                         |        |
| 222C<br>Boise  | KIZN        | LIC   | CY           | 321.8       | 194.26          | 43 45 21.0   | 48.000             | 135.9             | 92.8                       | 42.6                    | 78.6   |
|  |             |   | ID           | 140.7       | BLH20010831AAH  | 116 05 54.0  | 828                | 2215              | Radio License Holding Cbc, |                         |        |
| Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM<br>In & Out distances between contours are shown at closest points. Reference Zone=West Zone, Co to 3rdadjacent.<br>Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E),Beamtilt(Y,N,X)<br>***affixed to 'IN' or 'OUT' values = site inside protected contour. |             |   |              |             |                 |              |                    |                   |                            |                         |        |

Exhibit 13 - A addresses the 3<sup>rd</sup> adjacent construction permit and license of KTPZ on channel 224

**Compliance with C.F.R. 74.1204**

The proposed FM Translator is located within the protected 60 dBu contour of third adjacent channel stations KTPZ.C channel 224C1 and KTPZ channel 224C3, each facility specifies Hazelton, Idaho as its community of license. According to 74.1204(a)(3), in order to protect second and third adjacent facilities, the difference in dBu between the two facilities must not exceed 40dBu.

The proposed ERP for K221FT: 230 watts

The proposed COR for K221FT: 71 meters

**KTPZ.C** F(50/50) contour at proposed site: 74.1 dBu

The F(50/10) contour of proposed K221FT 114.1 dBu

The predicted distance to K221FT interference contour: 209.8 meters

**KTPZ** F(50/50) contour at proposed site: 61 dBu

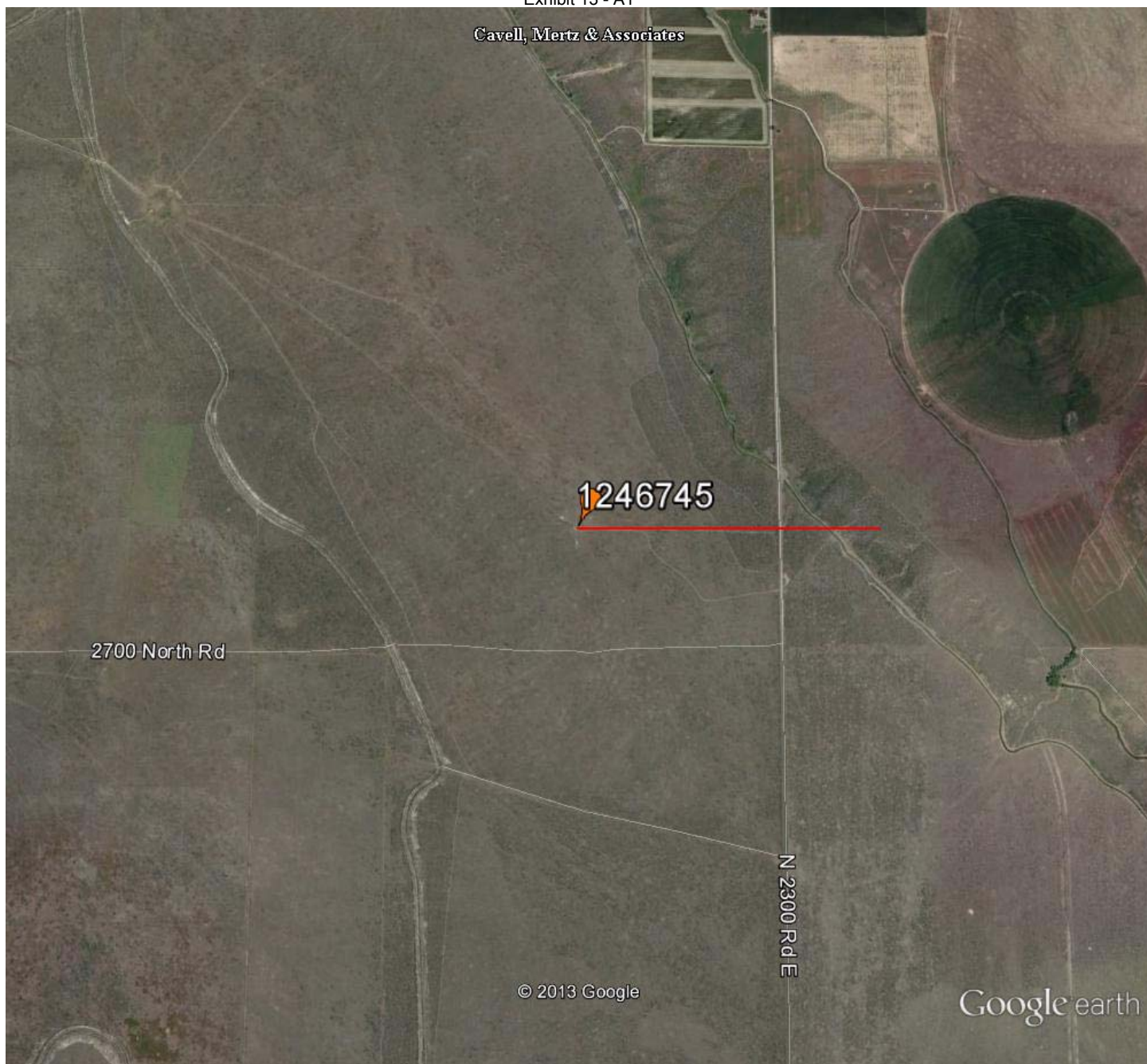
The F(50/10) contour of proposed K221FT 101 dBu

The predicted distance to K221FT interference contour: 947.7 meters

As can be seen in Exhibit 13 - A1 the site is rural. There are no regularly occupied structures at the base of the tower or within the furthest maximum distance to interference contour of 947.7 m.

Therefore, EMF respectfully requests a waiver of C.F.R. 74.1204 based on no population within the area of predicted interference.

Cavell, Mertz & Associates



Google earth

miles 1  
km 1



NAD27 COORDINATES

42 23 35 N

114 36 04 W

The tower is in a rural area. The red line on the map measures 947.7m from the base of the tower which is marked by the antenna structure registration number.