

**December 2021
KZGD(AM) 1390 kHz
Hubbard, Oregon
Section 307(b) Analysis Engineering**

Background

The instant application is being filed by the licensee of AM station KZGD, proposing a change in transmitter site, and a change in community of license from Salem, Oregon to Hubbard, Oregon. The station will operate from an existing antenna tower currently in use by AM station KWBY.

Hubbard Allocation Study

The allocation study exhibit included in this application demonstrates that the proposed 1390 kHz facility at Hubbard satisfies the relevant interference protection requirements in the FCC Rules. This proposal is mutually-exclusive with the licensed KZGD facility at Salem.

First Local Service at Hubbard, Oregon

The proposed modification will provide the first local service licensed to Hubbard, which is an incorporated city with a 2010 Census population of 3,173 persons. Hubbard therefore qualifies as a community for allotment purposes. The FCC considers a town or city to be a community for allotment purposes when it is either incorporated or listed in the US Census.

Salem will retain local service from 2 AM stations (KSLM and KBZY) and 2 full-power FM stations (KAJC and KWBX).

Gain and Loss Area Study

There is some overlap of the licensed and proposed 2 mV/m contours. The loss area will encompass a land area of 1,639 sq km and a population of 279,662 persons. The gain area will encompass a land area of 1,121 sq km and a population of 181,291 persons.

While this proposal will result in a net reduction of service area and population, it will provide a first local service (Priority 3) to Hubbard, which is a rural community. This is favored over the retention of a fifth local service at Salem.¹

No White or Gray Areas Will Be Created

No white or gray areas (zero or one aural services remaining) will be created as a result of this proposal. 100% of the loss area is covered by the 60 dBu contour of each of the following four FM stations KRKT 260C0 Albany, KLOO 292C Corvallis, KHPE 300C Albany, and KYTE 274C0 Independence.

In addition, numerous other stations provide service to the loss area, such that the entire loss area is considered to be well-served, with in excess of five reception services remaining. (See attached “Loss Area Study Map”.) The entire gain area is also considered to be well-served.

No Tuck Analysis Required

Hubbard is not located within any Urbanized Area, and the proposed KZGD facility provides daytime 5 mV/m service to only about 1% each of the nearby Salem Urbanized Area and Portland Urbanized Area.

Salem UA: While the licensed daytime 5 mV/m contour encompasses 98% of the Salem Urbanized Area, the proposed facility reduces that figure to 1%. Consequently the instant proposal does not trigger the requirement of a “Tuck” study with regard to the Salem UA. Indeed, as can be seen on the attached “UA Study Map”, this proposal represents a relocation from the central city of the Salem UA, to a rural area. This is a result which is favored by the policies enunciated in the *Rural Radio* proceeding.

¹ Additionally, it should be noted that this relocation is being pursued because KZGD has lost the use of its licensed transmitter site. As was noted in the November 12, 2021 *Notification of Suspension of Operations and Request for Silent STA* (BLSTA-20211112AAF), the station “went silent on November 5, 2021 at approximately 11:30 A.M. Pacific Time due to termination of the station’s lease. Applicant has been informed that the landlord intends to sell the property. Applicant is therefore unable to renew or extend the lease and request Special Temporary Authority to remain silent pending location of a new site”

Portland UA: The instant proposal relocates KZGD closer to the Portland Urbanized Area, and will provide a daytime 5 mV/m contour to a small portion (approximately 1%) for the first time. However, as can be seen on the attached “UA Study Map” this proposal is located far from being able to provide 5 mV/m service to any significant portion of the Portland UA. Additionally, there is an existing second-adjacent channel station in Portland (KBNP 1410 kHz, which operates 5 kW nondirectional day). Consequently it would not be possible to file a rule-compliant minor modification to the instant proposal, without changing the proposed antenna configuration or site, to provide a daytime 5 mV/m contour to 50% or more of the Portland UA.





