

**73.525 Compliance**

There are several considerations outlined in 47 C.F.R. 73.525 for TV Channel 6 protection. Outlined below are the various factors as they apply to the proposed operation and KRMA-TV License (L) and Construction Permit (CP).

**1) Distance between proposed operation and KRMA-TV**

47 C.F.R. 73.525(a)(1) requires a minimum separation of 195 km for a channel 212 operation. The distance between the proposed station and KRMA-TV(CP) is 0.24 km. The distance between the proposed station and KRMA-TV(L) is 07.06 km.

**2) Population Limitation**

When a proposed non-commercial station is not co-located with the channel 6 station in question, the applicant is required to show that the interference area (as predicted by the procedures outlined in 47 C.F.R. 73.525(e)(1)) contains no more than 3,000 persons.

Per 47 C.F.R. 73.525(e)(4), if an applicant chooses to use mixed polarity, the permissible ERP is determined by the formula:  $[H + (V/A)]$  is not greater than P

Where: H = the horizontally polarized ERP in kilowatts for mixed polarity

V = the vertically polarized ERP in kilowatts for mixed polarity

A = 40 (if the predicted interference area lies entirely outside the limits of a city of 50,000 persons or more), or 10 (if it does not)

P = the maximum permitted horizontally polarized-only power in kilowatts.

Since the predicted interference area lies entirely outside the limits of a city of 50,000 persons or more, the value of 40 was used for A, giving the result:

$$[0.0 + (.43/40)] = 0.01075 \text{ kilowatts}$$

All population limits were calculated using the maximum permitted horizontally polarized-only power of 0.01075 kilowatts. The actual population figures are contained in Exhibit 18-B, and a map of the interference area is shown in Exhibit 18-C.

For the reasons outlined above, the proposed operation fully complies with the provisions of 47 C.F.R. 73.525.

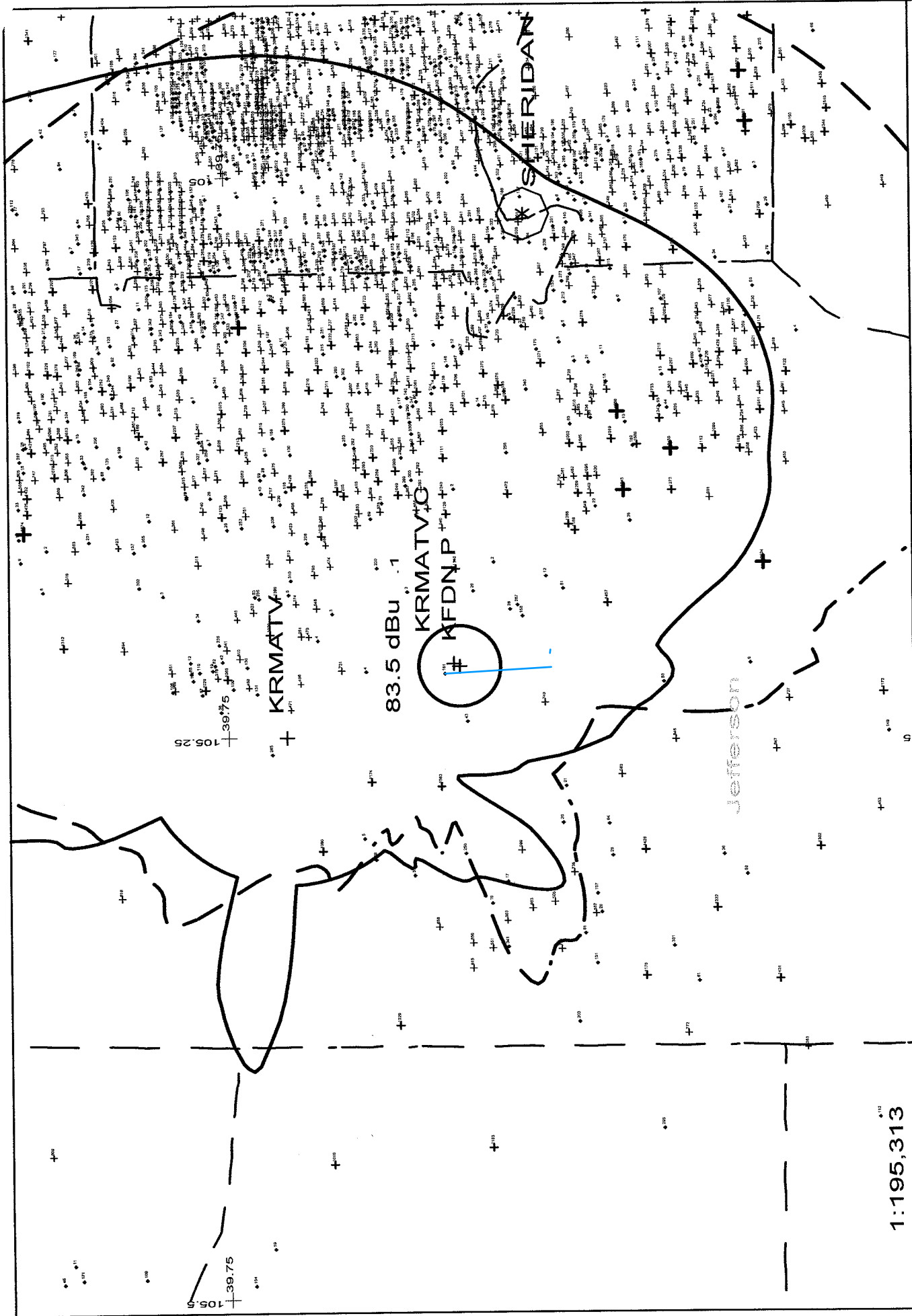
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Population in the predicted interference area was determined using the centroid method and the 2000 census. The predicted interference contour (of the theoretical horizontal component of 0.01075 kilowatts) is contained within both the KRMA-TV(CP) and the KRMA-TV(L) channel 6 grade A (68 dBu F(50,50)) contour (see Exhibit 18-C).

The predicted interference contour is determined from 47 C.F.R. 73.599 for channel 201 to be 83.5 dBu (see Exhibit 18-D).

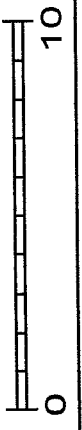
Exhibit 18-C shows the 90 dBu F(50,50) contour for KRMA-TV(L), the 90 dBu F(50,50) for KRMA-TV(CP), and the 83.5 dBu F(50,10) contour for the proposed channel 201 facility, with a population scattergraph of the area of proposed operation. The centroids that are within the predicted interference area are labeled. The total population in these centroids is 151 persons.

Therefore, the proposed operation is within the limitations of 47 CFR 73.525(c).



1:195,313

Scale in km



KFDN.P 201A .01075kW 2348M AMSL

N. Lat. 39 40 18 W. Lng. 105 13 05

Exhibit 18-C

EMF - 11/03

**Educational Media Foundation**  
**5700 West Oaks Blvd.**  
**Rocklin, CA 95765**

**Lakewood, CO**  
**Exhibit 18-D**  
**Channel 6 vs Channel 201**

Channel 6 Contour	Value from 73.599	Channel 201 Contour	Adjusted 6 dB
47 (grade B)	1.0	48.0	54.0
48	0.7	48.7	54.7
49	0.3	49.3	55.3
50	0.0	50.0	56.0
51	-0.3	50.7	56.7
52	-0.6	51.4	57.4
53	-1.0	52.0	58.0
54	-1.2	52.8	58.8
55	-1.5	53.5	59.5
56	-1.8	54.2	60.2
57	-2.0	55.0	61.0
58	-2.4	55.6	61.6
59	-2.6	56.4	62.4
60	-3.0	57.0	63.0
61	-3.2	57.8	63.8
62	-3.5	58.5	64.5
63	-3.6	59.4	65.4
64	-3.9	60.1	66.1
65	-4.1	60.9	66.9
66	-4.3	61.7	67.7
67	-4.5	62.5	68.5

Channel 6 Contour	Value from 73.599	Channel 201 Contour	Adjusted 6 dB
68 (grade A)	-4.6	63.4	69.4
69	-4.7	64.3	70.3
70	-4.9	65.1	71.1
71	-5.0	66.0	72.0
72	-5.1	66.9	72.9
73	-5.2	67.8	73.8
74	-5.3	68.7	74.7
75	-5.4	69.6	75.6
76	-5.5	70.5	76.5
77	-5.5	71.5	77.5
78	-5.6	72.4	78.4
79	-5.7	73.3	79.3
80	-5.8	74.2	80.2
81	-5.9	75.1	81.1
82	-6.0	76.0	82.0
83	-6.0	77.0	83
84	-6.0	78.0	84.0
85	-6.1	78.9	84.9
86	-6.2	79.8	85.8
87	-6.3	80.7	86.7
88	-6.4	81.6	87.6
89	-6.5	82.5	88.5
90	-6.5	83.5	89.5