

***APPLICATION FOR MODIFICATION
OF CONSTRUCTION PERMIT***

**FM TRANSLATOR STATION K242CW
OXNARD, CALIFORNIA
FACILITY ID: 156020
96.3 MHz / 0.130 kW ERP / DA**

HIGH DESERT BROADCASTING LLC

APRIL, 2017

APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT

The following engineering statement and attached exhibits have been prepared for **High Desert Broadcasting LLC** ("High Desert"), permittee of FM translator station K242CW, formerly K264BW, at Oxnard, California, and is in support of their application for modification of construction permit.¹ The proposed modification to the existing construction permit has become necessary due to earlier weather conditions in California, which have in addition to making construction at the site problematic, delayed ongoing repairs to the KVTA array. This modification to the construction permit is therefore being requested to allow for immediate construction of the facility due to the upcoming construction permit expiration.

High Desert seeks to modify the existing construction permit so as to utilize a single twenty-foot tower section that will be attached to the roof of the transmitter site. Following construction of this facility, which will be utilized on a temporary and interim basis, High Desert will seek a new construction permit to return to the elevation specified in the current construction permit.

The proposed structure to be utilized for this temporary operation would be 20 feet (6.1 meters) in height, and attached to an existing mount on the roof of the transmitter building. The center of radiation is to be located at 19 feet (5.8 meters) above the roof of the transmitter building, which is 47 feet (14.3 meters) above ground level. Due to the size of the antenna, a portion of it is located above the top of the single tower section. Thus, the overall structure height is 21.3 feet (6.5 meters) above the roof elevation, or 49.3 feet (15.0 meters) above ground level.

¹ The Facility ID for K242CW, formerly K264BW, at Oxnard, California, is 156020.

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The overall height of the structure above the roof elevation of 21.3 feet (6.5 meters) is 12.3 electrical degrees at the KVTa frequency of operation. If the transmitter building is also included, the overall height of 49.3 feet, 15.0 meters above ground level, corresponds to a height of 28.7 electrical degrees at the KVTa carrier frequency. This height is less than the action height for structures in the vicinity of AM transmission facilities, and as a result, no special notifications or considerations required.² Additionally, a TOWAIR study indicates that this structure would not require registration, and passes slope calculations to the Oxnard Airport.

K242CW is authorized to operate on FM channel 242, with a maximum effective radiated power of 100 Watts at a center of radiation of 70 meters above mean sea level, 55 meters above ground level, utilizing a directional antenna. The proposed facility would operate on FM channel 242 with a maximum effective radiated power of 130 Watts. The proposed center of radiation is 32.9 meters above mean sea level, which corresponds to an elevation of 15.0 meters, 49.3 feet, above ground level. The same directional antenna authorized for use under the current construction permit is proposed for use at this application, albeit at a different orientation than currently authorized.

The proposed site location is approximately 58 meters from the authorized location. This relocation distance implies significant overlap between the proposed and authorized facilities. This fact combined with the lack of change in the channel of operation, implies that the proposed changes to the K242CW technical parameters are minor in nature.

² The Facility ID for KVTa at Ventura, California is 7746. KVTa is licensed to Gold Coast Broadcasting LLC, which is an entity related to High Desert.

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K242CW is currently authorized to serve as a translator for AM station KKZZ at Port Hueneme, California.³ The proposed facility would continue to qualify as a translator for that station, which is licensed to Gold Coast Broadcasting LLC ("Gold Coast"). Gold Coast is a related entity to High Desert, and a written retransmission agreement remains in effect for the translating of KKZZ by K242CW. Exhibit E-1 provides an illustration of the proposed K242CW 60 dBu service contour, along with the KKZZ 2 mV/m daytime contour, and a 25 mile radius centered on the KKZZ transmitter site. As this map demonstrates, the proposed K242CW 60 dBu contour complies with the translator siting rules.

The proposed facility complies with the provisions of Section 74.1204 of the Commission's Rules. Exhibit E-2 is a tabular interference study for the proposed facility. This study demonstrates that the proposed K242CW facility would comply with the contour overlap provisions of that section of the Commission's Rules to all relevant facilities with the exception of KCAQ at Camarillo, California, and KLJR-FM at Santa Paula, California.⁴ The situation to these two facilities will be considered under the provisions of Section 74.1204(d) of the Commission's Rules. This tabular study is graphically illustrated in the contour map that comprises Exhibit E-3.

Although normally prohibited contour overlap between the proposed facility and both KCAQ and KLJR-FM would occur, no populated areas would be affected by the potential interference region. Exhibit E-4 illustrates the proposed transmitter site location for K242CW, along with the 77.2 dBu service contour for the licensed KCAQ facility, the 72.0 dBu service contour for the KCAQ

³ The Facility ID for KKZZ at Port Hueneme, California is 25091.

⁴ The Facility ID for KCAQ at Camarillo, California, licensed to Gold Coast, is 70563. The Facility ID for KLJR-FM at Santa Paula, California is 35925.

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construction permit, and the 70.44 dBu service contour for KLJR-FM. Each of these facilities is second adjacent to the proposed translator facility, and as a result, interference to any one is predicted to occur when the translator field strength is at least 40 dB above that of the full power station under consideration.

Specifically, interference to the KCAQ licensed and construction permit facilities would be predicted to occur in regions where the translator field strength is 117.2 dBu and 112.0 dBu respectively. In the case of KJLR-FM, the translator interfering field strength is at least 110.44 dBu. Since the field strength to cause interference to KJLR-FM results in a worst-case scenario, it will be utilized as the basis for interference for each of the facilities.

The following satellite derived image illustrates the proposed K242CW transmitter site, and the immediate surroundings of the site. This image also depicts the 110.44 dBu contour. This image demonstrates that the predicted interference contour intersects no structures except the KVTa transmitter building.

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The proposed facility would not result in a significant environmental impact, and is exempt from environmental processing. The addition of the antenna to the building on a temporary basis will not increase the existing impact already present from the structure.

The antenna utilized is a Kathrein-Scala CA5-FM/CP/RM circularly polarized antenna. This particular antenna is not one of the types specifically identified under the Commission's *FM Model* utility. As a result, it will be assumed to be a single bay type-1 antenna. The power density calculated for this set of parameters is $34.5 \mu\text{W}/\text{cm}^2$. This value complies with the upper limit permissible under the uncontrolled environment condition.

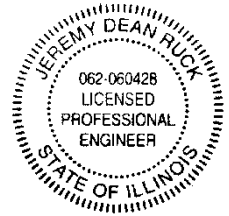
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4.19.2017

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2017

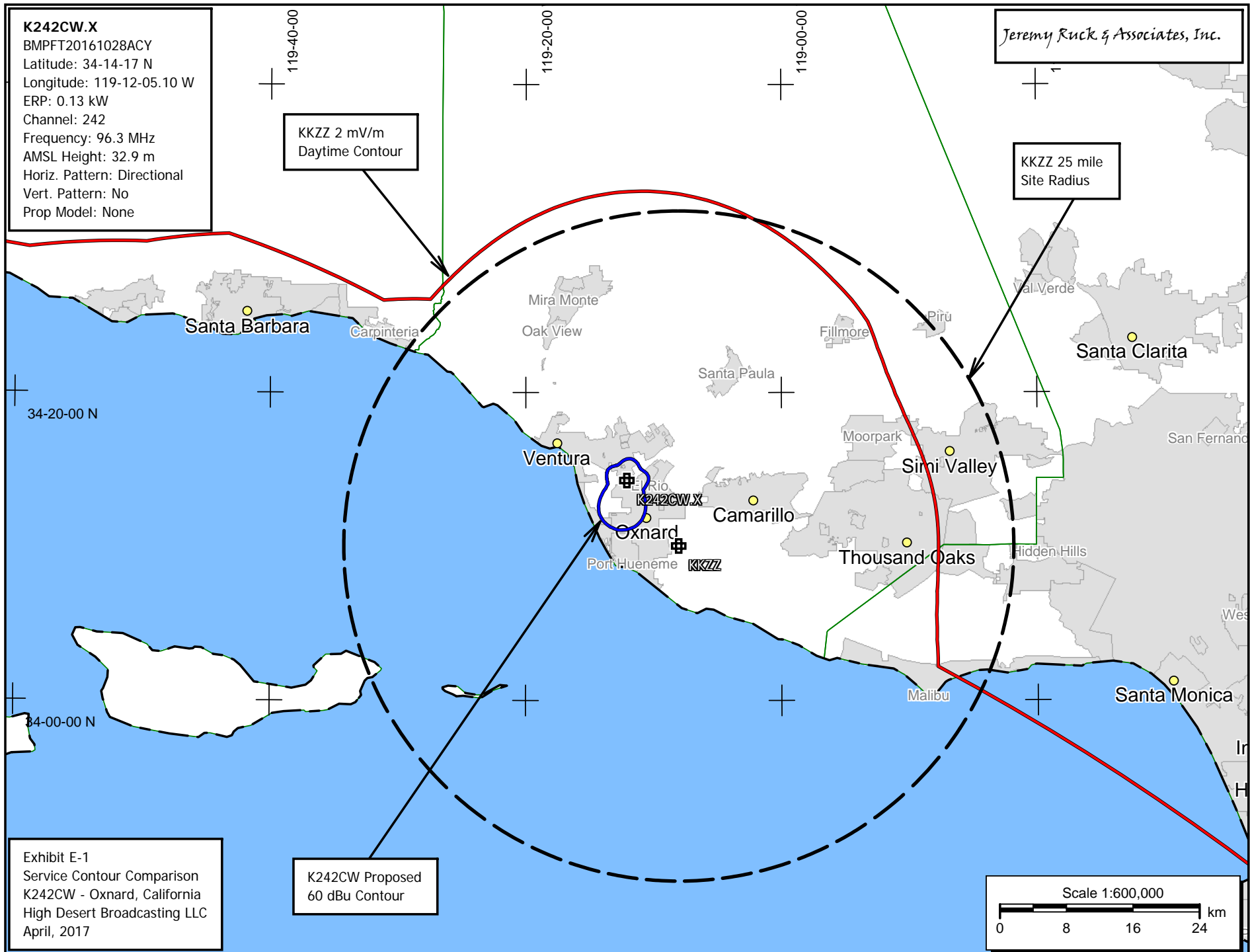
Jeremy D. Ruck, PE
April 19, 2017

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4.19.2017



Jeremy Ruck & Associates, Inc.
Consulting Engineers - Canton, Illinois

Exhibit E-2 - Tabular Interference Study
K242CW - Oxnard, California
CH# 242D - 96.3 MHz, Pwr= 0.13 kW DA, HAAT= -39.5 M, COR= 32.9 M
Average Protected F(50-50)= 6.01 km
Standard Directional

REFERENCE
34 14 17.0 N.
119 12 05.1 W.

DISPLAY DATES
DATA 04-19-17
SEARCH 04-19-17

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DI ST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
242B Los Angeles	KXOL-FM	LIC ZCX CA		92.8 273.3	86.82 BLH20060926AHF	34 11 48.0 118 15 30.0	6.600 398	138.3 848	72.8 Kxol Licensing, Inc.	-53.6*	0.3
240B1 Camarillo	KCAQ	LIC NCN CA		314.7 134.6	17.49 BLH19980209KF	34 20 55.0 119 20 13.0	1.200 444	2.3 689	52.7 Gold Coast Broadcasting LI	12.6	-35.4*
240A Camarillo	KCAQ	CP _CX CA		36.8 216.9	25.57 BPH20151120ASM	34 25 20.0 119 02 04.0	1.000 245	2.2 892	49.4 Gold Coast Broadcasting LI	20.9	-23.9*
242D Oxnard	K242CW	CP DC_ CA		218.9 38.9	0.15 BMPFT20161028ACY	34 14 13.0 119 12 09.0	0.100 70	13.2 70	4.1 High Desert Broadcasting L	-18.3*	-21.0*
244A Santa Paula	KLJR-FM	LIC _CX CA		56.9 237.0	17.88 BMLH20040420AAV	34 19 33.0 119 02 18.0	0.280 457	1.2 703	32.7 Lazer Licenses, LIc	14.3	-15.0*
244D Ventura	KLJR-FM1	LIC DHN CA		305.6 125.6	9.97 BLFTB19911226TA	34 17 25.0 119 17 23.0	0.003 24	0.0 142	0.1 Lazer Licenses, LIc	7.4	9.0
296A Ventura	KSSC	LIC _C_ CA		315.6 135.6	17.20 BLH20010102AAI	34 20 55.0 119 19 57.0	0.370 395	23.5 679	15.8 Entravision Holdings, LIc	9.5R	7.7M
242D Santa Clarita	KXOL-FM1	LIC DC_ CA		79.4 259.7	56.28 BLFTB20140804ABJ	34 19 48.0 118 35 56.0	0.014 1118	20.0 1118	3.4 Kxol Licensing, Inc.	33.7	44.5
243L1 Santa Barbara	KZAA-LP	LIC _ CA		294.8 114.5	48.87 BLL20170117ABP	34 25 17.2 119 41 06.8	0.100 45			36.4 La Casa De La Raza	38.4
243B Bakersfield	KPSL-FM	LIC _CX CA		11.5 191.7	141.60 BMLH20050720AEX	35 29 08.0 118 53 19.0	50.000 152	97.7 514	81.1 Lotus Bakersfield Corp.	41.2	55.2

Terrain database is FCC 30 meter , 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= East Zone 2A, 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.
Reference station has protected zone issue: Mexico- AM tower

K242CW.X

BMPFT20161028ACY
Latitude: 34-14-17 N
Longitude: 119-12-05.10 W
ERP: 0.13 kW
Channel: 242
Frequency: 96.3 MHz
AMSL Height: 32.9 m
Elevation: 17.9 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

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- 60 dBu F(50,50) Service Contour
- 57 dBu F(50,50) Service Contour
- 54 dBu F(50,50) Service Contour
- 34 dBu F(50,10) Interference Contour
- 40 dBu F(50,10) Interference Contour
- 54 dBu F(50,10) Interference Contour
- 97 dBu F(50,10) Interference Contour
- 100 dBu F(50,10) Interference Contour

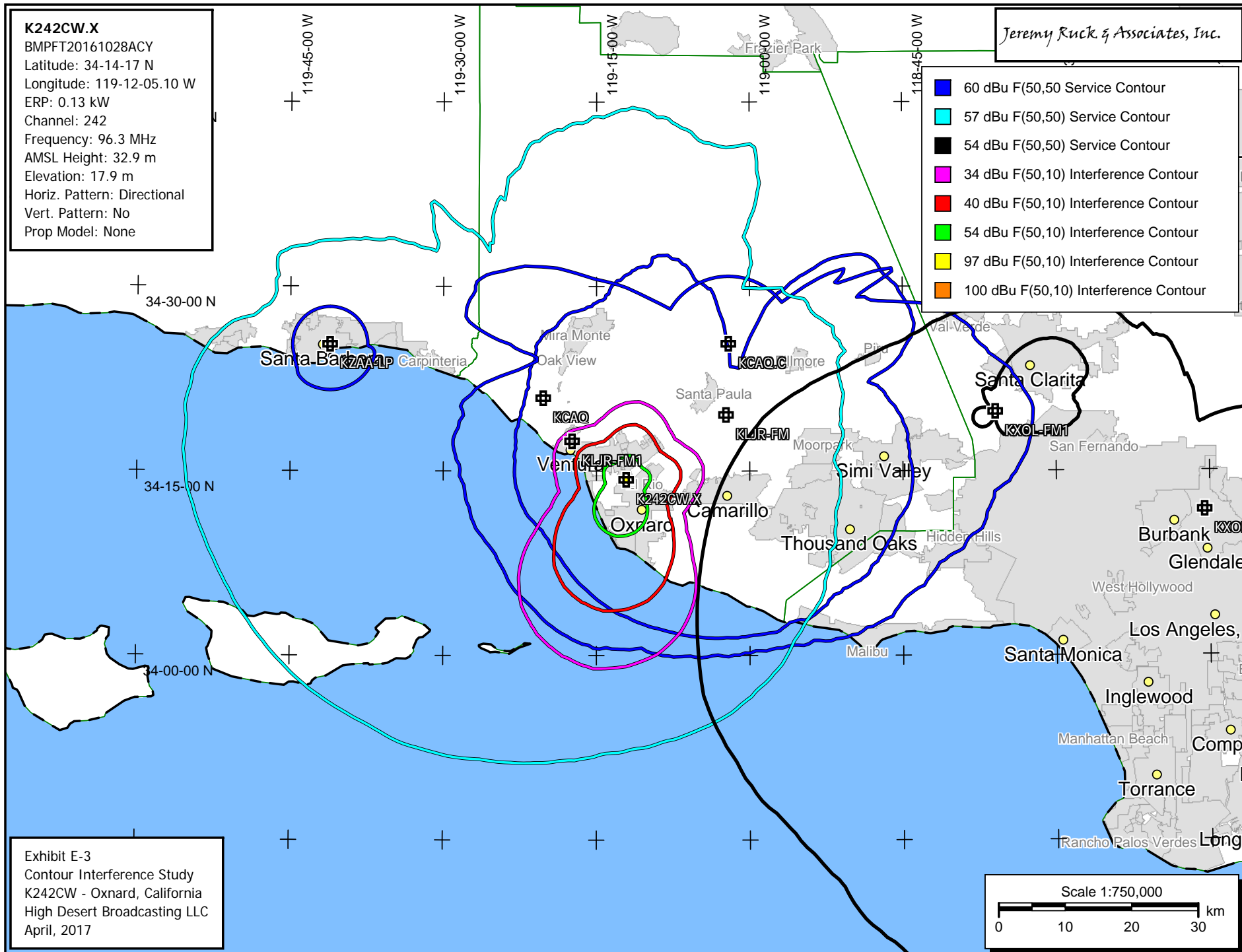


Exhibit E-3
Contour Interference Study
K242CW - Oxnard, California
High Desert Broadcasting LLC
April, 2017

K242CW.X

BMPFT20161028ACY
Latitude: 34-14-17 N
Longitude: 119-12-05.10 W
ERP: 0.13 kW
Channel: 242
Frequency: 96.3 MHz
AMSL Height: 32.9 m
Horiz. Pattern: Directional

KCAQ

BLH19980209KF
Latitude: 34-20-55 N
Longitude: 119-20-13 W
ERP: 1.20 kW
Channel: 240
Frequency: 95.9 MHz
AMSL Height: 689.0 m
Horiz. Pattern: Omni

KCAQ.C

BPH20151120ASM
Latitude: 34-25-20 N
Longitude: 119-02-04 W
ERP: 1.00 kW
Channel: 240
Frequency: 95.9 MHz
AMSL Height: 892.0 m
Horiz. Pattern: Omni

KLJR-FM

BMLH20040420AAV
Latitude: 34-19-33 N
Longitude: 119-02-18 W
ERP: 0.28 kW
Channel: 244
Frequency: 96.7 MHz
AMSL Height: 703.0 m
Horiz. Pattern: Omni

Exhibit E-4
Interference Study
K242CW - Oxnard, California
High Desert Broadcasting LLC
April, 2017

Jeremy Ruck & Associates, Inc.

K242CW Transmitter
Site Location

KLJR-FM 70.44 dBu
Service Contour

KCAQ Licensed
77.2 dBu Contour

KCAQ CP
72.0 dBu Contour

Scale 1:50,000

0 0.7 1.4 2.1 km

Oxnard