

ENGINEERING STATEMENT RE
APPLICATION FOR A CONSTRUCTION PERMIT
FOR SITE CHANGE
KLSY-FM, BELLEVUE, WASHINGTON
CHANNEL 223C 50 KW 698 METERS HAAT

AUGUST 2005

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

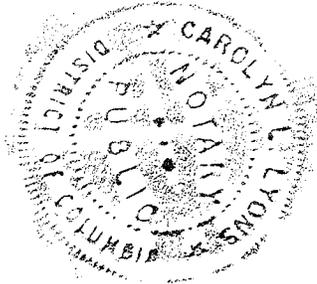
That his qualifications are a matter of record in the Federal Communications Commission;

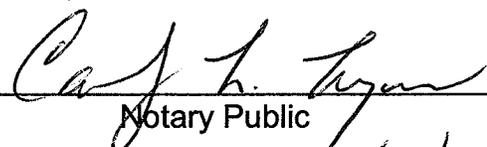
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 12th day of August, 2005.




Notary Public

My Commission Expires: 2/28/2008

Introduction

This engineering report has been prepared on behalf of Bellevue Radio Inc. in support of an application for a construction permit for a change in facilities and change in site of FM broadcast station KLSY-FM licensed to Bellevue, Washington.

This application proposes to change the effective radiated power (“ERP”), the height of the antenna, the location of the transmitter site and operate from a master antenna. Therefore, as indicated below, KLSY-FM requests processing of this application under Section 73.215 of the Commission’s Rules. Also, FCC expedited processing is requested since prior Canadian coordination as provided in Table II and the slight change in site is approximately 0.5 km.

Transmitter Site

The geographic coordinates (NAD-27) of the existing site are as follows:

North Latitude: 47° 30' 17.3"

West Longitude: 121° 58' 3.4"

Tower Registration No. 1056093

The location is described from the tower registration as 10812 279th Avenue South East (West Tiger Mountain). Exhibit E-1 is the vertical antenna sketch of the existing tower.

Power Data

Transmitter output power	19.05 kW	12.8 dB
Combiner and filter loss		0.650 dB
Transmission line--6-1/8" rigid dual run 76.2 meters (250 feet)		0.138 dB
Master antenna		

Type, ERI Model 1084-8CP	3.147	4.979 dB
	Max. Horiz. 2.978	4.739
Maximum Effective Radiated Power (H&V)	50 kW	16.99 dB

Elevation Data

Elevation of the site above mean sea level:	865.3 meters (2838.9 feet)
Elevation of the top of supporting structure: above ground	94.5 meters (310 feet)
Elevation of the top of supporting structure: above mean sea level	959.8 meters (3149 feet)
Height of antenna radiation center: meters above ground	66.7 meters (218.8 feet)
Height of antenna radiation center: above mean sea level	932 meters (3057.7 feet)
Height of antenna radiation center: above average terrain	698 meters

Allocation Situation

Table I lists the distances to the pertinent co-channel and adjacent-channel FM stations from the existing and proposed KLSY-FM sites. Based on the required distance separations found in Section 73.207, the existing and proposed site for KLSY-FM is “short-spaced” to KGON(FM), Portland, Oregon (Channel 222C, FCC File No. BLH-19900820KF) and KULE-FM, Ephrata, Washington (Channel 222C2, FCC File No. BLH-19990108KA). Table II provides the results of the prior coordination with Canada. Exhibit E-2 depicts the allocation situation.

Contour Data

Exhibit E-3 shows the proposed 70 dBu and 60 dBu coverage contours. Table III lists the distances to contours for the proposed operation of KLSY-FM. The proposed 70 dBu contour will cover all of the principal community of Bellevue.

Main Studio Location

The main studio address is unchanged.

Blanketing Contour

The proposed blanketing contour (115 dBu) based on an ERP of 50 kW will extend approximately 2.79 kilometers. The area is rural in nature and no interference problems are anticipated since KLSY-FM has operated for many years from a nearby site with no reported interference complaints.

Environmental Statement

The following evaluation is based on a 100 kW (max) operation (50 kW H plus 50 kW V) with a center of radiation above ground of 218.8 feet (66.7 meters). Based on information from the antenna manufacturer the downward field value is in the range of 0.05 for all stations operating from the master antenna. See Exhibit E-4 for the elevation pattern for KLSY-FM. The proposed operation complies with the FCC Rules, Section 1.1307, as it meets the provisions of the FCC radiation frequency field (“RFF”) guideline as the RFF 2 meters above ground is computed to be $2 \mu\text{W}/\text{cm}^2$ or well below the $200 \mu\text{W}/\text{cm}^2$ FCC guideline for uncontrolled exposure limit. This is based upon the methodology contained in OET Bulletin 65 dated August 1997 and Appendix A.

Therefore, the RFF study will consider the following stations:

<u>Station</u>	<u>Frequency</u> MHz	<u>Status</u>
KLSY-FM	92.5	Prop
KMPS-FM	94.1	Lic
KJAQ(FM)	96.5	CP
KZOK-FM	102.5	Lic
KBKS-FM	106.1	Lic
KWJZ(FM)	98.9	Prop
KWPX(TV)	584-590	Lic
KWPX-DT	578-584	Lic
KWDK(TV)	722-728	Lic
KWDK-DT	638-644	Lic
KHCV(TV)	656-662	Lic
KHCV-DT	650-656	CP
KWOG(TV)	692-698	Lic
KWOG-DT	686-692	CP

The RFF contribution of each station will be calculated using the following formula:

$$S = \frac{33.4(F^2) \text{ Total ERP}}{R^2}$$

where:

S = power density in $\mu\text{W}/\text{cm}^2$

F = relative field factor

Total ERP = ERP Horizontal Polarization + ERP Vertical Polarization

R = RCAGL - 2 meters

ERP = RMS ERP in watts for DTV Stations

ERP = $[0.4 \text{ ERP}_V + \text{ERP}_A]$ for NTSC Stations

ERP_V = peak visual ERP in watts

ERP_A = RMS aural ERP in watts

KLSY-FM FM Facility

Channel 223 Freq: 92.5 MHz range
 ERP = 50 kW
 Polarization = Horizontal + Vertical
 RCAGL -2 meters = 64.7 meters

KLSY-FM proposes to utilize an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this antenna is included in Exhibit E-4. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 50 kW (Horizontal + Vertical)
 R = 64.7 meters
 F = 0.05 (field factor)

$$S = 2.0 \mu\text{W}/\text{cm}^2$$

KLSY-FM contributes 2.0 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is 200 $\mu\text{W}/\text{cm}^2$ for a station broadcasting in 30-300 MHz range.

Therefore:

KLSY-FM FM facility contributes less than 1.0% RFF for an uncontrolled environment two meters above ground at the tower site.

KMPS-FM FM Facility

Channel 231 Freq: 94.1 MHz
 Max ERP = 73 kW
 Polarization = Horizontal + Vertical
 RCAGL -2 meters = 64.7 meters

KMPS-FM is using an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this type of master antenna is included in Exhibit E-4. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 73 kW (Horizontal + Vertical)
R = 64.7 meters
F = 0.05 (field factor)

$$S = 2.9 \mu\text{W}/\text{cm}^2$$

KMPS-FM contributes $2.9 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is $200 \mu\text{W}/\text{cm}^2$ for a station broadcasting in the 30-300 MHz range.

Therefore:

KMPS-FM FM facility contributes less than 1.46% RFF for an uncontrolled environment two meters above ground at the tower site.

KJAQ(FM) FM Facility

Channel 243	Freq:	96.5 MHz
	Max ERP =	52 kW
	Polarization =	Horizontal + Vertical
	RCAGL -2 meters =	64.7 meters

KJAQ(FM) is using an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this type of antenna is included in Exhibit E-4. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 52 kW (Horizontal + Vertical)
R = 64.7 meters
F = 0.05 (field factor)

$$S = 2.1 \mu\text{W}/\text{cm}^2$$

KJAQ(FM) contributes $2.1 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is $200 \mu\text{W}/\text{cm}^2$ for a station broadcasting in 30-300 MHz range.

Therefore:

KJAQ(FM) facility contributes less than 1.04% RFF for an uncontrolled environment two meters above ground at the tower site.

KZOK-FM FM Facility

Channel 273 Freq: 102.5 MHz range
 Max ERP = 73 kW
 Polarization = Horizontal + Vertical
 RCAGL -2 meters = 64.7 meters

KZOK-FM is using an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this type of master antenna is included in Exhibit E-4. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 73 \text{ kW (Horizontal + Vertical)} \\ R = 64.7 \text{ meters} \\ F = 0.05 \text{ (field factor)} \end{array}$$

$$S = 2.9 \mu\text{W/cm}^2$$

KZOK-FM contributes 2.9 $\mu\text{W/cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is 200 $\mu\text{W/cm}^2$ for a station broadcasting in the 30-300 MHz range.

Therefore:

KZOK-FM facility contributes less than 1.46% RFF for an uncontrolled environment two meters above ground at the tower site.

KBKS-FM FM Facility

Channel 291 Freq: 106.1 MHz range
 ERP = 73 kW
 Polarization = Horizontal + Vertical
 RCAGL -2 meters = 64.7 meters

KBKS-FM is using an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this type of master antenna is included in Exhibit E-4. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 73 \text{ kW (Horizontal + Vertical)} \\ R = 64.7 \text{ meters} \\ F = 0.05 \text{ (field factor)} \end{array}$$

$$S = 2.9 \mu\text{W}/\text{cm}^2$$

KBKS-FM contributes $2.9 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is $200 \mu\text{W}/\text{cm}^2$ for a station broadcasting in the 30-300 MHz range.

Therefore:

KBKS-FM facility contributes less than 1.46% RFF for an uncontrolled environment two meters above ground at the tower site.

KWJZ(FM) FM Facility

Channel 255	Freq:	98.9 MHz range
	ERP =	58 kW
	Polarization =	(Horizontal + Vertical)
	RCAGL -2 meters =	64.7 meters

KWJZ(FM) proposes to utilize an ERI, Type 1084-8CP antenna with 1.31° electrical beam tilt. The manufacturer's vertical plane pattern for this antenna is included in Exhibit E-5. Based on this plot, the field factor will be less than 0.05 at any angle greater than 65 degrees below the horizon. A value of 0.05 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{Tot ERP}}{R^2}$$

Tot ERP = 58 kW (Horizontal + Vertical)
R = 64.7 meters
F = 0.05 (field factor)

$$S = 2.3 \mu\text{W}/\text{cm}^2$$

KWJZ(FM) contributes $2.3 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment is $200 \mu\text{W}/\text{cm}^2$ for a station broadcasting in 30-300 MHz range.

Therefore:

KWJZ(FM) facility contributes less than 1.16% RFF for an uncontrolled environment two meters above ground at the tower site.

KWPX(TV) NTSC Facility

Channel 33	Freq:	584-590 MHz range
	ERP =	(0.4) [3720 kW (visual)]+[372 kW (aural)]

Polarization = Horizontal
 RCAGL -2 meters = 81 meters

KWPX(TV) is using a Dielectric, Type TFU-31ETT-RCTSP antenna with 1.0° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 1860 kW (Horizontal Only)
 R = 81 meters
 F = 0.1 (field factor)

$$S = 94.7 \mu\text{W}/\text{cm}^2$$

KWPX(TV) contributes 94.7 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is f/1500 for a station broadcasting in the 300-1500 MHz range.

(587 MHz)/1500 = 391.3 $\mu\text{W}/\text{cm}^2$ is the RFF limit for KWPX(TV)

Therefore:

KWPX(TV) NTSC facility contributes less than 24.2% RFF for an uncontrolled environment two meters above ground at the tower site.

KWPX-DT DTV Facility

Channel 32 Freq: 578-584 MHz range
 ERP = 175 kW
 Polarization = Horizontal
 RCAGL-2 meters = 81 meters

KWPX-DT is using a Dielectric, Type TFU-31ETT-RCTSP antenna with 1.1° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 175 kW (Horizontal Only)
 R = 81 meters
 F = 0.1 (field factor)

$$S = 8.9 \mu\text{W}/\text{cm}^2$$

KWPX-DT contributes 8.9 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is f/1500 for a station broadcasting in the 300-1500 MHz range.

$(581 \text{ MHz})/1500 = 387.3 \mu\text{W}/\text{cm}^2$ is the RFF limit for KWPX-DT

Therefore:

KWPX-DT DTV facility contributes less than 2.3% RFF for an uncontrolled environment two meters above ground at the tower site.

KWDK(TV) NTSC Facility

Channel 56	Freq:	722-728 MHz range
	ERP =	(0.4) [3980 kW (visual)]+[398 kW (aural)]
	Polarization =	Horizontal
	RCAGL -2 meters =	58 meters

KWDK(TV) is using a PSI, Type USM25AC2/56 antenna with 0.75° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{Tot ERP}}{R^2}$$

Tot ERP = 1990 kW (Horizontal Only)
R = 58 meters
F = 0.1 (field factor)

$$S = 197.6 \mu\text{W}/\text{cm}^2$$

KWDK(TV) contributes $197.6 \mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$(725 \text{ MHz})/1500 = 483.3 \mu\text{W}/\text{cm}^2$ is the RFF limit for KWDK(TV)

Therefore:

KWDK(TV) NTSC facility contributes less than 40.9% RFF for an uncontrolled environment two meters above ground at the tower site.

KWDK-DT DTV Facility

Channel 42	Freq:	638-644 MHz range
	ERP =	144 kW
	Polarization =	Horizontal + Vertical
	RCAGL -2 meters =	58 meters

KWDK-DT is using a SWR, Type SWED160I antenna with 1.0° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 144 kW (Horizontal + Vertical)
R = 58 meters
F = 0.1 (field factor)

$$S = 28.6 \mu\text{W}/\text{cm}^2$$

KWDK-DT contributes 28.6 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$$(641 \text{ MHz})/1500 = 427.3 \mu\text{W}/\text{cm}^2 \text{ is the RFF limit for KWDK-DT}$$

Therefore:

KWDK-DT DTV facility contributes less than 6.7% RFF for an uncontrolled environment two meters above ground at the tower site.

KHCV(TV) NTSC Facility

Channel 45	Freq:	656-662 MHz range
	ERP =	(0.4) [2000 kW (visual)]+[200 kW (aural)]
	Polarization =	Horizontal
	RCAGL -2 meters =	77 meters

KHCV(TV) will use a Bogner, Type BU(I)24N-G antenna with 0.5° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$$

Tot ERP = 1000 kW (Horizontal Only)
R = 77 meters
F = 0.1 (field factor)

$$S = 56.3 \mu\text{W}/\text{cm}^2$$

KHCV(TV) contributes 56.3 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$$(659 \text{ MHz})/1500 = 439.3 \mu\text{W}/\text{cm}^2 \text{ is the RFF limit for KHCV(TV)}$$

Therefore:

KHCV(TV) NTSC facility contributes less than 12.8% RFF for an uncontrolled environment two meters above ground at the tower site.

KHCV-DT DTV Facility

Channel 44	Freq:	650-656 MHz range
	ERP =	240 kW
	Polarization =	Horizontal
	RCAGL -2 meters =	77 meters

KHCV-DT is using a Bogner, Type BU(I)24N-G antenna with 0.5° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$S = 33.4 (F^2) \text{ Tot ERP}$	Tot ERP = 240 kW (Horizontal Only)
	R = 77 meters
	F = 0.1 (field factor)

$$S = 13.5 \mu\text{W}/\text{cm}^2$$

KHCV-DT contributes 13.5 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$$(653 \text{ MHz})/1500 = 435.3 \mu\text{W}/\text{cm}^2 \text{ is the RFF limit for KHCV-DT}$$

Therefore:

KHCV-DT DTV facility contributes less than 3.1% RFF for an uncontrolled environment two meters above ground at the tower site.

KWOG(TV) NTSC Facility

Channel 51	Freq:	692-698 MHz range
	ERP =	(0.4) [3800 kW (visual)]+[380 kW (aural)]
	Polarization =	Horizontal
	RCAGL -2 meters =	83 meters

KWOG(TV) is using an Andrew, Type ATW25H3-HTC2U-51 antenna with 0.75° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site. A value of 0.1 will be used in the calculation.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 1900 \text{ kW (Horizontal Only)} \\ R = 83 \text{ meters} \\ F = 0.1 \text{ (field factor)} \end{array}$$

$$S = 92.2 \mu\text{W}/\text{cm}^2$$

KWOG(TV) contributes 92.2 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$$(695 \text{ MHz})/1500 = 463.3 \mu\text{W}/\text{cm}^2 \text{ is the RFF limit for KWOG(TV)}$$

Therefore:

KWOG(TV) NTSC facility contributes less than 19.9% RFF for an uncontrolled environment two meters above ground at the tower site.

KWOG-DT DTV Facility

Channel 50	Freq:	686-692 MHz range
	ERP =	240 kW
	Polarization =	Horizontal
	RCAGL -2 meters =	83 meters

KWOG-DT will use an Andrew, Type ATW25H3-HTC2U-51 antenna with 1.25° electrical beam tilt. The field factor is assumed to be less than 0.1 at any angle below the horizon in the vicinity of the proposed tower site.

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 240 \text{ kW (Horizontal Only)} \\ R = 83 \text{ meters} \\ F = 0.1 \text{ (field factor)} \end{array}$$

$$S = 11.6 \mu\text{W}/\text{cm}^2$$

KWOG-DT contributes 11.6 $\mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $f/1500$ for a station broadcasting in the 300-1500 MHz range.

$$(689 \text{ MHz})/1500 = 459.3 \mu\text{W}/\text{cm}^2 \text{ is the RFF limit for KWOG-DT}$$

Therefore:

KWOG-DT facility contributes less than 2.5% RFF for an uncontrolled environment two meters above ground at the tower site.

Total Uncontrolled RFF at Site

The total uncontrolled RFF contribution for all transmitters can now be calculated:

$$\text{Total uncontrolled RFF} = 1.46\% + 1.04\% + 1.46\% + 1.46\% + 1.00\% + 1.16\% + 24.2\% + 2.3\% + 40.9\% + 6.7\% + 12.8\% + 3.1\% + 19.9\% + 2.5\%$$

$$\text{Total uncontrolled RFF} = 120\%$$

The tower site owner indicates that they are in the process of having an RFF site survey performed and any further restrictions other than the current fencing about the tower sites that are required will be undertaken.

Authorized personnel and rigging contractors will be alerted to the potential zone of high radiation on the tower, and if necessary, KLSY-FM will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

An environmental assessment (“EA”) is categorically excluded under Section 1.1306 of the FCC Rules and Regulations since the licensee understands that:

- (a)(1) The proposed facilities located on an existing tower are not located in an officially designated wilderness area.
- (a)(2) The proposed facilities located on an existing tower are not located in an officially designated wildlife preserve.

- (a)(3) The proposed facilities located on an existing tower will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities located on an existing tower will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities located on an existing tower will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The proposed facilities located on an existing tower are not located near any known Indian religious sites.
- (a)(6) The proposed facilities located on an existing tower are not located in a flood plain.
- (a)(7) The location of the existing FM antenna on an existing tower will not alter significantly the surface features at the site.
- (a)(8) It is not proposed to change the tower lighting and complies with FAA requirements.
- (b) A security fence with a locked gate will surrounds the tower. Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines based on the methodology contained in OET Bulletin 65, Edition 97-01 and Appendix A. Authorized personnel will be alerted to areas of the tower where potential RFF levels are in excess of the current FCC guidelines and the transmitter power will be reduced or terminated as required.

ABOVE GROUND

ABOVE MEAN SEA LEVEL

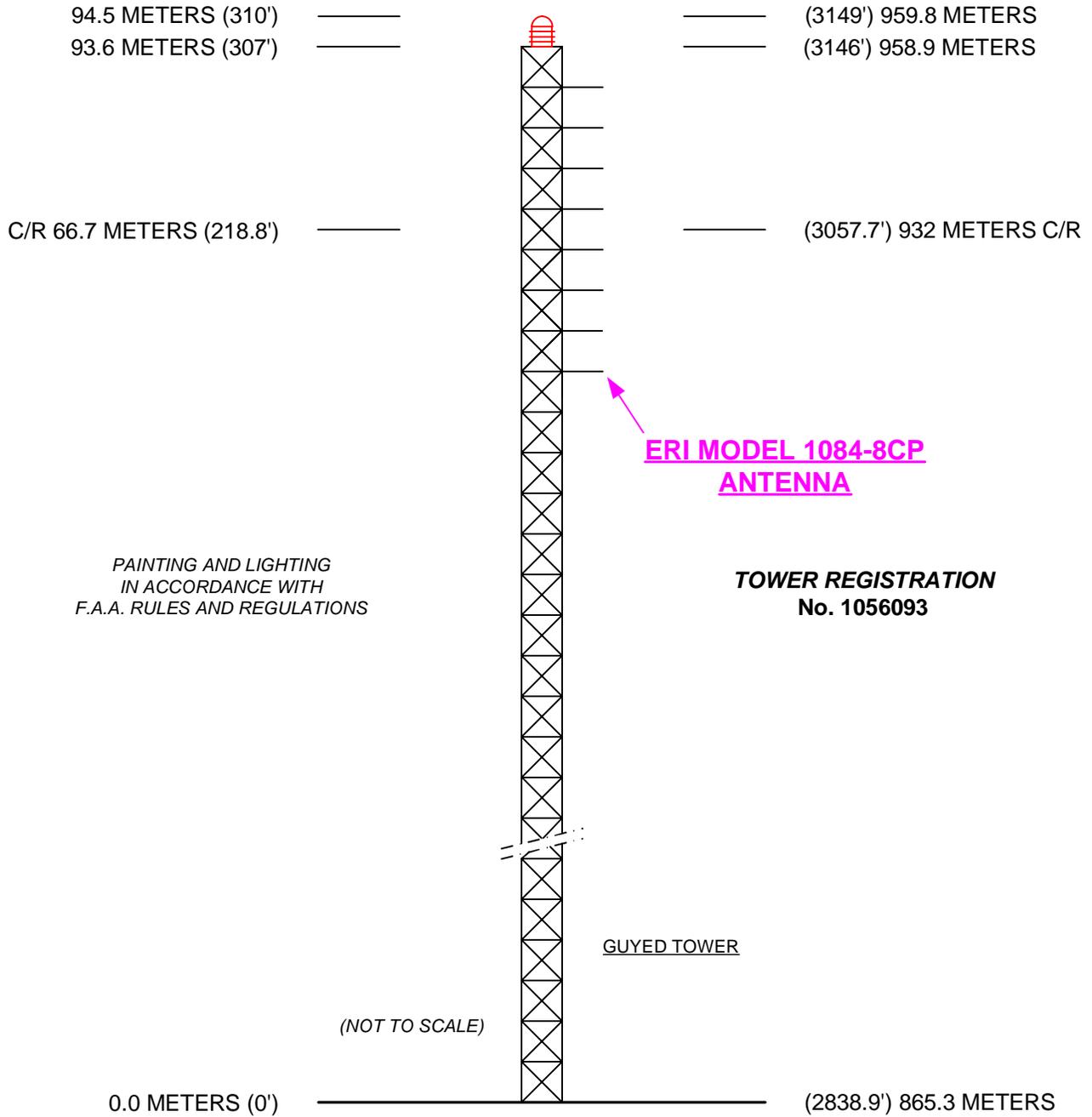


EXHIBIT E - 1
VERTICAL SKETCH
FOR THE PROPOSED FM OPERATION OF
KLSY-FM, BELLEVUE, WASHINGTON
AUGUST 2005

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
ALLOCATION SITUATION
FOR THE PROPOSED OPERATION OF
KLSY-FM, BELLEVUE, WASHINGTON
AUGUST 2005

<u>Channel</u>	<u>Frequency</u> MHz	<u>Call</u>	<u>City/State</u>	<u>ERP</u> kW	<u>HAAT</u> meters	<u>Coordinates</u>	<u>Distance</u>		
							<u>Present</u> km	<u>Proposed</u> km	<u>Required</u> km
223C	92.5	KLSY-FM	Bellevue, WA	56	714	47°30'14" 121°58'29"	0.5	0	--
222C	92.3	KGON(FM)	Portland, OR	97	386	45°29'20" 122°41'40"	230.7	230.9	241
222C2	92.3	KULE-FM	Ephrata, WA	26	205	47°18'18" 119°35'53"	180.8	180.2	188
223C1	92.5	KZHR(FM)	Dayton, WA	54	379	45°59'19" 118°10'28"	335.7	335.3	270
224C3	92.7	KMSW(FM)	The Dalles, OR	3.4	272	45°38'56" 121°16'20"	213.1	213.1	176
224C2	92.7	KNCW(FM)	Omak, WA	4.1	287	48°19'12" 119°32'18"	203.5	203	188
224A	92.7	KAQX(FM) App	Long Beach, WA	6.0	71	46°18'51" 124°03'07"	206.3	206.7	165

Channel 223 (92.5 MHz)
Center of Radiation 932 meters AMSL
Antenna Height Above Average Terrain 698 meters
Effective Radiated Power 50 kW (16.99 dBk) Max. (H&V)

North Latitude: 47° 30' 17.3"
West Longitude: 121° 50' 3.4"
NAD-27

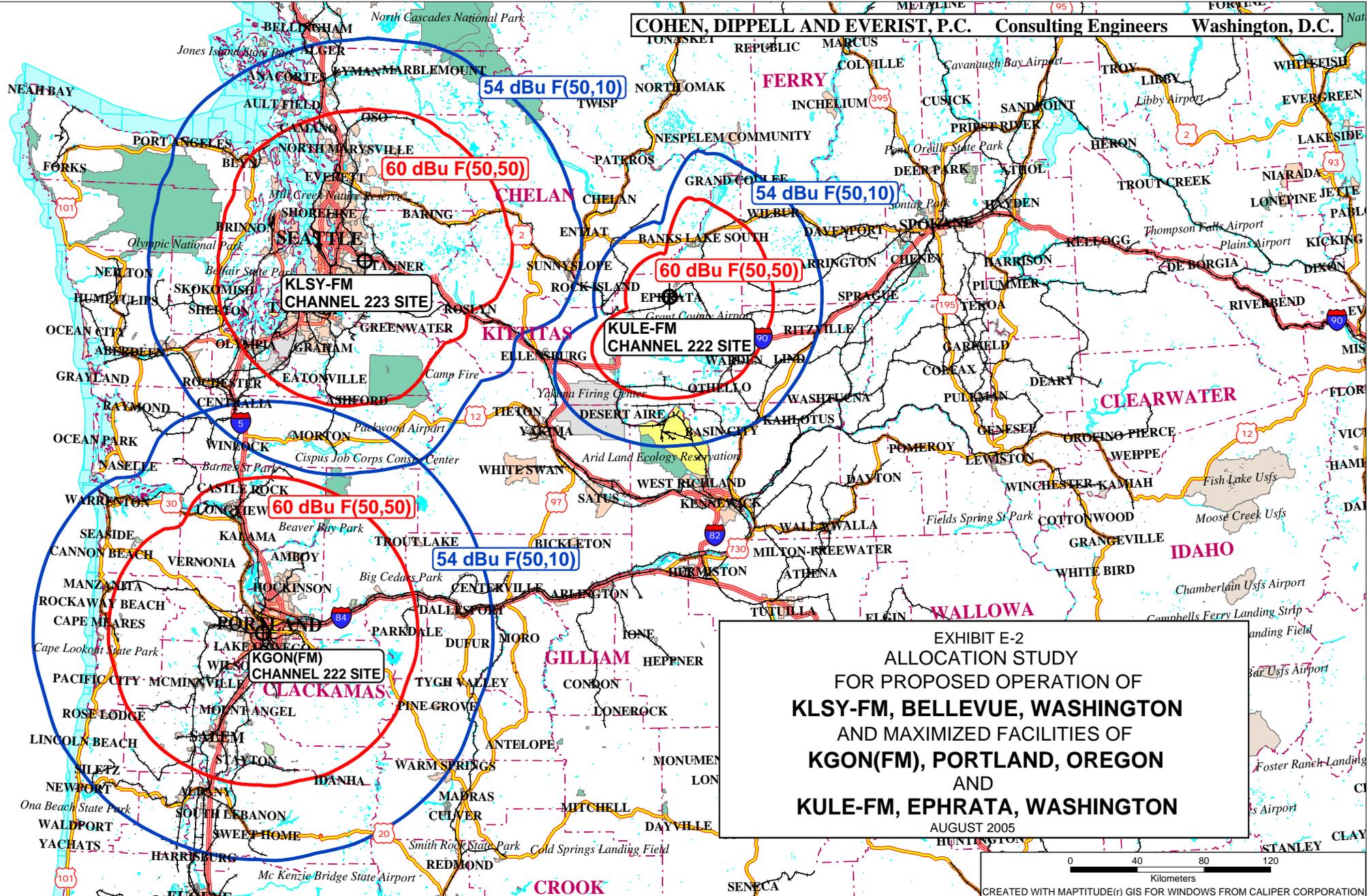


EXHIBIT E-2
ALLOCATION STUDY
FOR PROPOSED OPERATION OF
KLSY-FM, BELLEVUE, WASHINGTON
AND MAXIMIZED FACILITIES OF
KGON(FM), PORTLAND, OREGON
AND
KULE-FM, EPHRATA, WASHINGTON
AUGUST 2005

TABLE II



Industry Canada Industrie Canada
 300 Slater Street
 Ottawa, Ontario
 K1A 0C8

RECEIVED & INSPECTED
 JUL 19 2005
FCC-MAILROOM

6116-2-1 (DBC-E)
 July 15, 2005

Ms. Kathryn O'Brien
 Chief, Strategic Analysis and
 Negotiations Division
 Federal Communications Commission
 445 12th Street, SW
 Washington, DC 20554 USA

Dear Ms. O'Brien,

This is in reply to your letter dated April 11, 2005 requesting comments on the following proposed amendments to Table B of the Working Arrangement pursuant to the Canada-USA FM Broadcasting Agreement of 1997:

<u>Location</u>	<u>Channel Number</u>	
	<u>Delete</u>	<u>Add</u>
Seattle, WA 47-32-41 NL/122-06-28 WL	255C	----
Seattle, WA 47-30-17 NL/121-58-04 WL	----	255C
Bellevue, WA 47-30-14 NL/121-58-29 WL	223C*	----
Bellevue, WA 47-30-17 NL/121-58-04 WL	----	223C*

* Specially negotiated short-spaced allotment (Bellevue is short-spaced to a Canadian proposal on channel 223A*(L) in Abbotsford, BC).

This Administration has no objection to the above proposals as notified and will amend Table B accordingly should we hear further in this regard.

Sincerely,

Paul Vaccani
 Director
 Broadcast Applications
 Engineering
 Broadcasting Regulatory Branch

Canada

TABLE III
COMPUTED COVERAGE DATA
FOR THE PROPOSED FM OPERATION OF
KLSY, BELLEVUE, WASHINGTON
CHANNEL 223 50 KW 698 METERS HAAT
AUGUST 2005

<u>Radial</u> <u>Bearing</u> N ° E, T	<u>Average*</u> <u>Elevation</u> <u>3.2 to 16.1 km</u> meters	<u>Effective</u> <u>Height</u> meters	<u>Depression</u> <u>Angle</u>	<u>ERP At</u> <u>Radio</u> <u>Horizon</u> kW	<u>Distance to Contour F(50,50)</u>	
					<u>70 dBu</u> <u>3.16 mV/m</u> km	<u>60 dBu</u> <u>1 mV/m</u> km
0	138.2	793.8	0.780	50	67.0	91.6
45	180.6	751.4	0.759	50	65.7	90.2
90	255.1	676.9	0.721	50	63.2	87.6
135	546.6	385.4	0.544	50	48.9	71.5
180	267.9	664.1	0.714	50	62.7	87.2
225	159.1	772.9	0.770	50	66.4	90.9
270	224.0	708.0	0.737	50	64.3	88.7
315	80.8	851.2	0.808	50	68.7	93.5
Average	231.5	700.5*				

*Based on data from FCC 3-second data base

FM Channel 223 (92.5 MHz)
Average Elevation 3.2 to 16.1 km 231.5 meters AMSL
Center of Radiation 932 meters AMSL
Antenna Height Above Average Terrain 698 meters
Effective Radiated Power 50 kW (16.99 dBk) Max.
Horizontal ERP 50 kW
Vertical ERP 50 kW

North Latitude: 47° 30' 17"
West Longitude: 121° 58' 04"

(NAD-27)

The value of 698 meters is specified to conform to HAAT values for facilities licensed that operate from this master antenna.

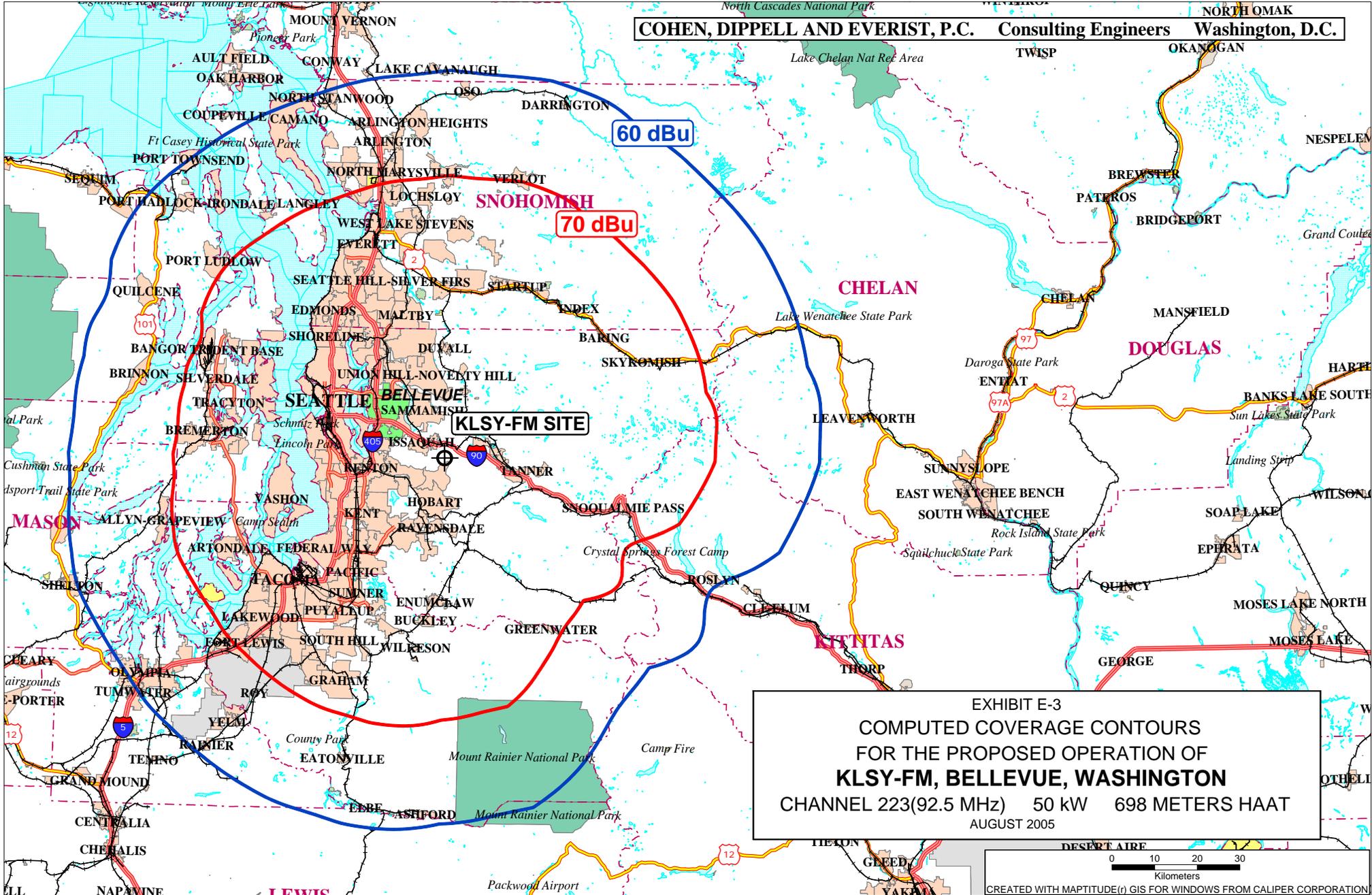
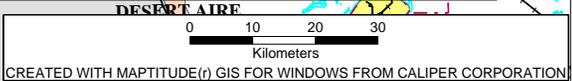


EXHIBIT E-3
COMPUTED COVERAGE CONTOURS
FOR THE PROPOSED OPERATION OF
KLSY-FM, BELLEVUE, WASHINGTON
CHANNEL 223(92.5 MHz) 50 kW 698 METERS HAAT
AUGUST 2005



ELECTRONICS RESEARCH, INC.
7777 GARDNER ROAD
CHANDLER, IN. 47610

FIGURE 1E

----THEORETICAL----
VERTICAL PLANE RELATIVE FIELD

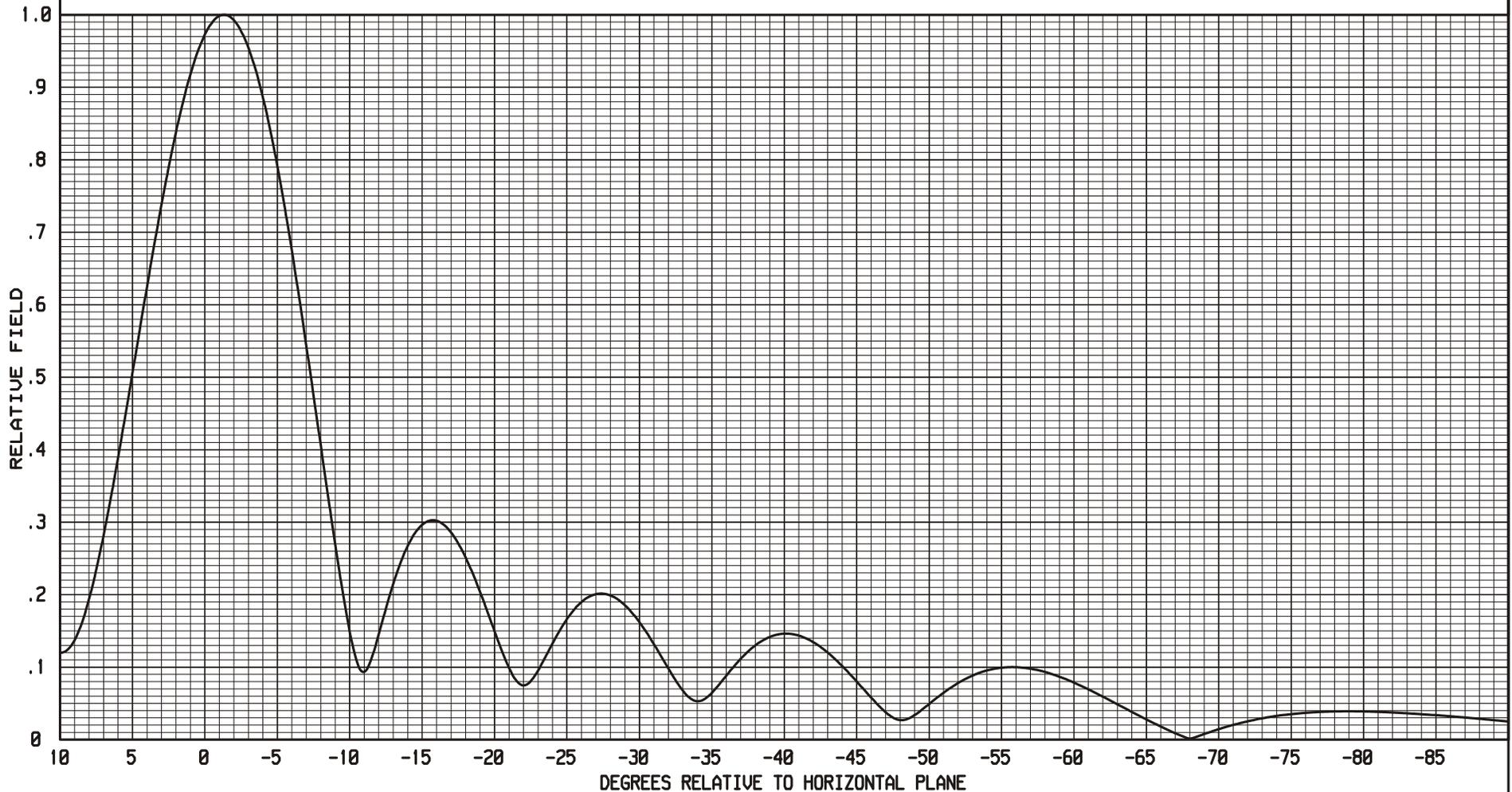
8 LEVELS OF TYPE 1000 ELEMENTS
-1.31 DEGREE(S) BEAM TILT
9 PERCENT FIRST NULL FILL
7 PERCENT SECOND NULL FILL

POWER GAIN IS 2.978 IN THE HORIZONTAL PLANE(3.147 IN THE MAX.)
[POWER GAINS AT 95% ANTENNA EFFICIENCY]

MARCH 31, 2005

92.5 MHz.

BAY SPACING:
92.00 INCHES



ELECTRONICS RESEARCH, INC.
7777 GARDNER ROAD
CHANDLER, IN. 47610

FIGURE 1F

----THEORETICAL----
VERTICAL PLANE RELATIVE FIELD

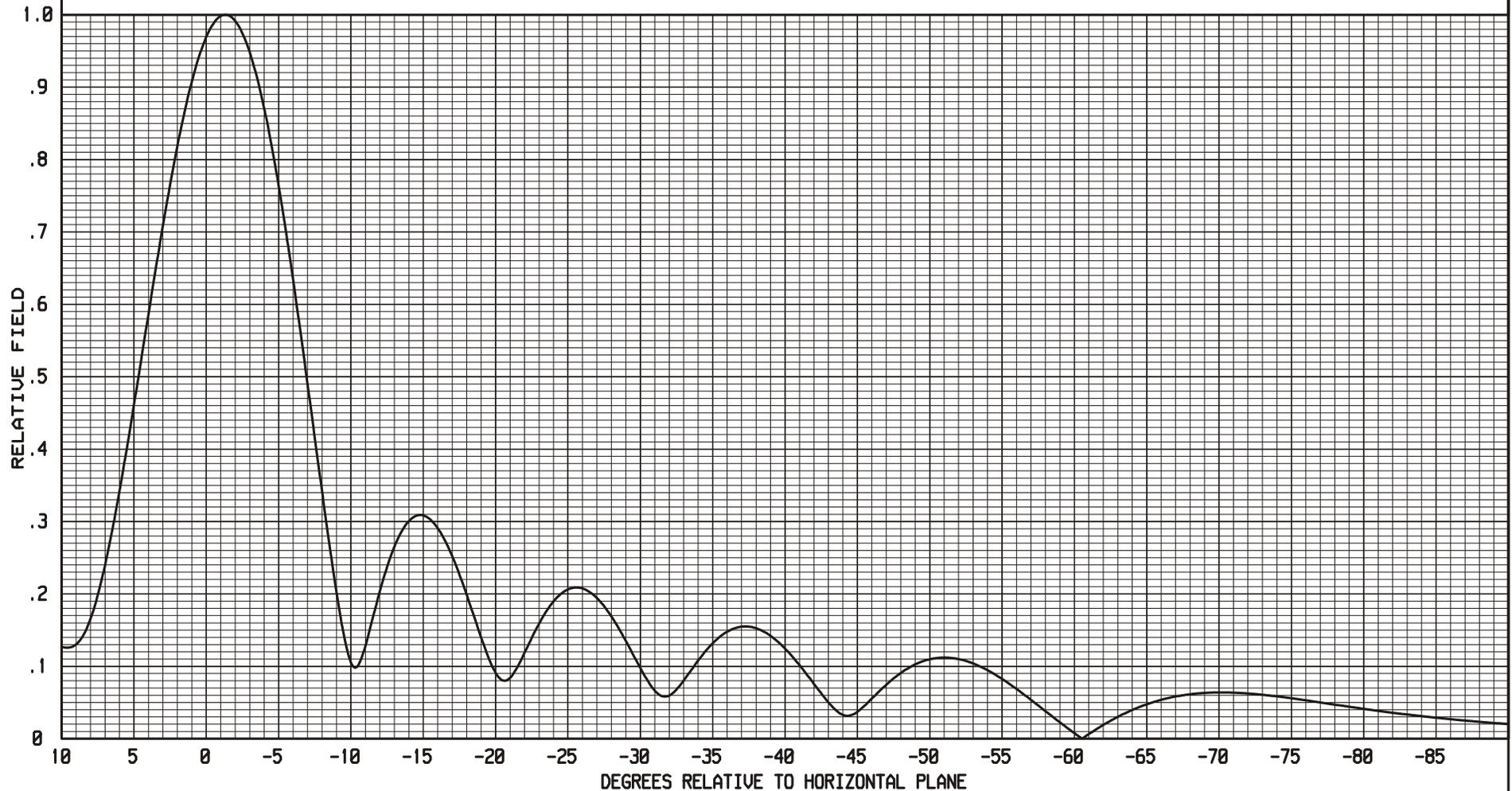
8 LEVELS OF TYPE 1000 ELEMENTS
-1.31 DEGREE(S) BEAM TILT
10 PERCENT FIRST NULL FILL
8 PERCENT SECOND NULL FILL

POWER GAIN IS 3.100 IN THE HORIZONTAL PLANE (3.299 IN THE MAX.)
[POWER GAINS AT 95% ANTENNA EFFICIENCY]

MARCH 31, 2005

98.9 MHz.

BAY SPACING:
92.00 INCHES



SECTION III-B FM Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECHBOX

1. Channel: _____
2. Class: A B1 B C3 C2 C1 C D

3. Antenna Location Coordinates: (NAD 27)
- _____ ° _____ ' _____ " N S Latitude
- _____ ° _____ ' _____ " E W Longitude

4. One-Step Proposal Allotment Coordinates: (NAD 27) Not applicable
- _____ ° _____ ' _____ " N S Latitude
- _____ ° _____ ' _____ " E W Longitude

5. Antenna Structure Registration Number: _____
- Not applicable FAA Notification Filed with FAA

6. Overall Tower Height Above Ground Level: _____ meters
7. Height of Radiation Center Above Mean Sea Level: _____ meters (H) _____ meters (V)
8. Height of Radiation Center Above Ground Level: _____ meters (H) _____ meters (V)
9. Height of Radiation Center Above Average Terrain: _____ meters (H) _____ meters (V)
10. Effective Radiated Power: _____ kW (H) _____ kW (V)
11. Maximum Effective Radiated Power: Not applicable _____ kW (H) _____ kW (V)
(Beam-Tilt Antenna ONLY)

12. Directional Antenna Relative Field Values: Not applicable (Nondirectional)
- Rotation: _____ ° No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

- 13. **Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203. Yes No See Explanation in Exhibit No.

- 14. **Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315. Yes No See Explanation in Exhibit No.

- 15. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125. Yes No See Explanation in Exhibit No.

- 16. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. Yes No See Explanation in Exhibit No.

Separation Requirements.

- a. 47 C.F.R. Section 73.207.

Grandfathered Short-Spaced.

- b. 47 C.F.R. Section 73.213(a) with respect to station(s): _____ Exhibit No.
Exhibit Required.

- c. 47 C.F.R. Section 73.213(b) with respect to station(s): _____ Exhibit No.
Exhibit Required.

- d. 47 C.F.R. Section 73.213(c) with respect to station(s): _____ Exhibit No.
Exhibit Required.

Contour Protection.

- e. 47 C.F.R. Section 73.215 with respect to station(s): _____ Exhibit No.
Exhibit Required.

- 17. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.*, the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.** Yes No See Explanation in Exhibit No.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

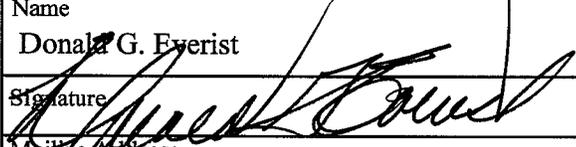
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Donald G. Everist	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date August 12, 2005	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).