

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12<sup>th</sup> STREET SW**  
**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
**HOME PAGE:** [www.fcc.gov/mb/audio](http://www.fcc.gov/mb/audio)

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**PROCESSING ENGINEER:** Tung Bui  
**TELEPHONE:** (202) 418-2722  
**FACSIMILE:** (202) 418-1410  
**MAIL STOP:** 1800B3  
**INTERNET ADDRESS:** [tung.bui@fcc.gov](mailto:tung.bui@fcc.gov)

Bustos Media Holdings, LLC  
5110 SE Stark Street  
Portland, OR 97215

In re: KDDS-FM, Elma, WA  
Facility I.D. No.: 33622  
Bustos Media Holdings, LLC  
Request for confirmation of compliance with  
47 C.F.R. § 73.1125

Dear Licensee:

This refers to your attorney letter requesting confirmation that the main studio location of KDDS-FM, Elma, Washington complies with 47 C.F.R. § 73.1125. The letter included a supplemental showing of technical statements and studies which use an alternate propagation methodology to demonstrate that the main studio location is within the 70 dBu field strength contour for the facilities specified by KDDS-FM's license BMLH-20090211ABR, as required by 47 C.F.R. § 73.1125. The main studio is located at 455 SW 152<sup>nd</sup> Street, Burien, WA 98166 (47° 28' 00" N.L., 122° 20' 25" W.L.).

The engineering study which KDDS-FM submitted calculated the desired field strength contours using the Institute of Telecommunications Sciences Irregular Terrain Model, also known as the "Longley-Rice" model, permitted by 47 C.F.R. § 73.313(e) and (f). Your study indicates that the 455 SW 152<sup>nd</sup> Street location lies within the 70 dBu contour as defined using the Longley-Rice prediction methodology. Furthermore, the exhibit demonstrates that the distance to KDDS-FM's authorized 70 dBu field strength contour exceeds the distance to the 70 dBu field strength contour as calculated using the F(50,50) propagation curves by approximately 15% along the azimuth from KDDS-FM's transmitter location in the direction of the proposed main studio. Therefore, your engineering showing was referred to the Commission's Office of Engineering and Technology ("OET") for a detailed propagation analysis.

By way of a Memorandum dated January 29, 2015 the OET confirmed that the main studio location is encompassed by the 70 dBu field strength contour of the facilities specified in KDDS-FM's license. Accordingly, we find that KDDS-FM's main studio location would be in compliance with 47 C.F.R. § 73.1125.

Sincerely,



Rodolfo F. Bonacci  
Assistant Chief  
Audio Division  
Media Bureau

cc: Dennis J. Kelly (via email)