

**LANCASTER EDUCATIONAL BROADCAST SERVICE
KLQS-LP 97.5 FM AGUA DULCE, CALIF
FAC ID NO. 195731**

MINOR CHANGE OF LICENSED FACILITY

Channel	248L1
New Location:	34° 28' 17.2" N 118° 22' 13.6" W-- NAD 83 34° 28' 17.2" N 118° 29' 20.2" W -- NAD 27
Antenna AGL	7 m
Tower Total	7 m
Antenna Ground	677 m
Antenna COR	684 m
HAAT	-139.5 m
Power	50 w

Lancaster Educational Broadcast Service

REFERENCE 34 28 17.2 N. CLASS = L1 Int = DISPLAY DATES DATA 06-30-19
 118 22 10.3 W. Current Spacings to 2nd Adj. SEARCH 07-31-19
 ----- Channel 248 - 97.5 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
*KLAX-FM LIC-Z	250B	East Los Angeles	CA 154.9	37.71	66.5	-28.8
*KAMP-FM LIC-D	246B	Los Angeles	CA 134.2	38.92	66.5	-27.6
KLQS-LP APP	248L1	Agua Dulce	CA 65.9	5.83	23.5	-17.7
KHUG-LP LIC	248L1	Castaic	CA 276.9	24.80	23.5	1.3
KTPI-FM LIC	249A	Mojave	CA 18.1	59.29	55.5	3.8
KLYY LIC-D	248B	Riverside	CA 102.8	116.13	111.5	4.6
KRJK LIC	247A	Lamont	CA 338.4	86.24	55.5	30.7
KLSE LIC	248B	Goleta	CA 272.8	145.99	111.5	34.5
K287AL CP	247D	Mojave	CA 18.1	59.29	20.5	38.8

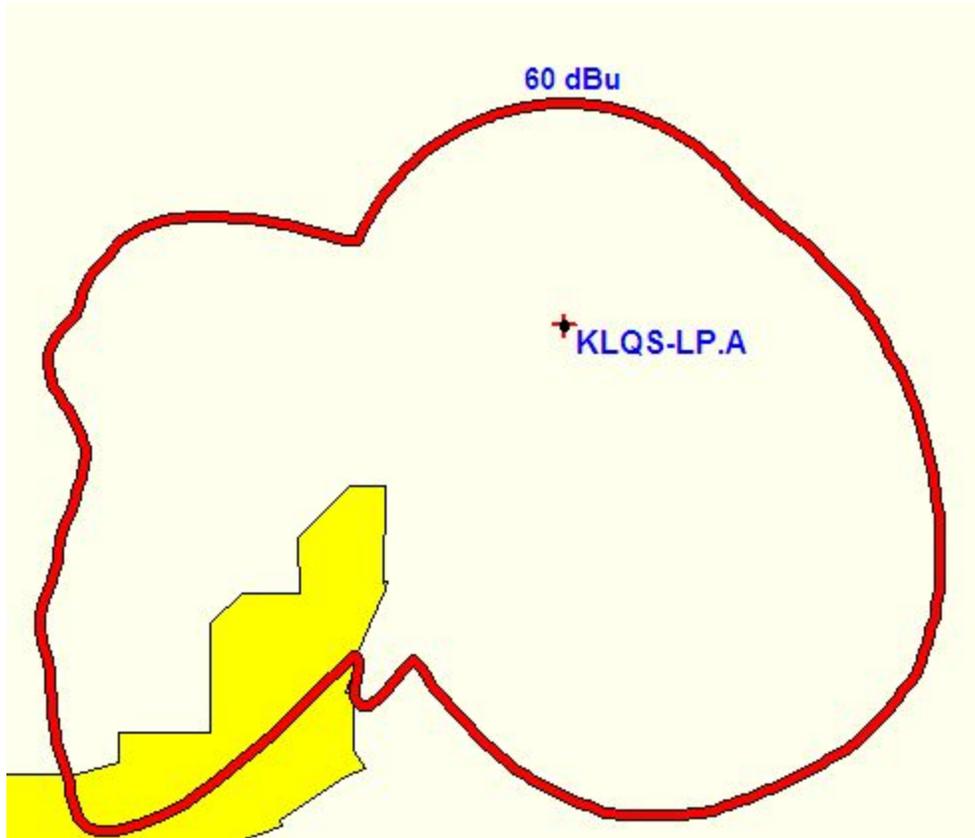
 Reference station has protected zone issue: Mexico- AM tower
 All separation margins include rounding

* See second adjacent waiver

Minor Change Move

Facility proposes 5.8 km move from licensed facility, which is considered a minor change. Minor change moves of 5.6 km prescribed in Section 73.870(a) round to 6.0 km, for which covers moves up to 6.499 km considering rounding.¹ Similar LPFM moves have been approved without waiver (e.g., BMPL-20150205ABP, The Rock FM Communications, Inc, LPFM, St. Cloud, MN, BMPL-20170602AAA, KOUV-LP, Recording NW, LPFM for Vancouver, WA).

¹ Rounding is used FM station distance calculation from § 73.208(c)(8). See Calvary Chapel of Costa Mesa, Inc., 27 FCC 557 (2012), where “The issue is whether a licensee filing a corrective modification of license application under Section 73.1690 may use the rounding methodology of Section 73.208”, reflecting on In Leonard S. Joyce, Esq. (13 FCC Rcd at 19605) for decision, where “The staff found that rigid application of the spacing requirements in such circumstances might have a deterrent effect.”

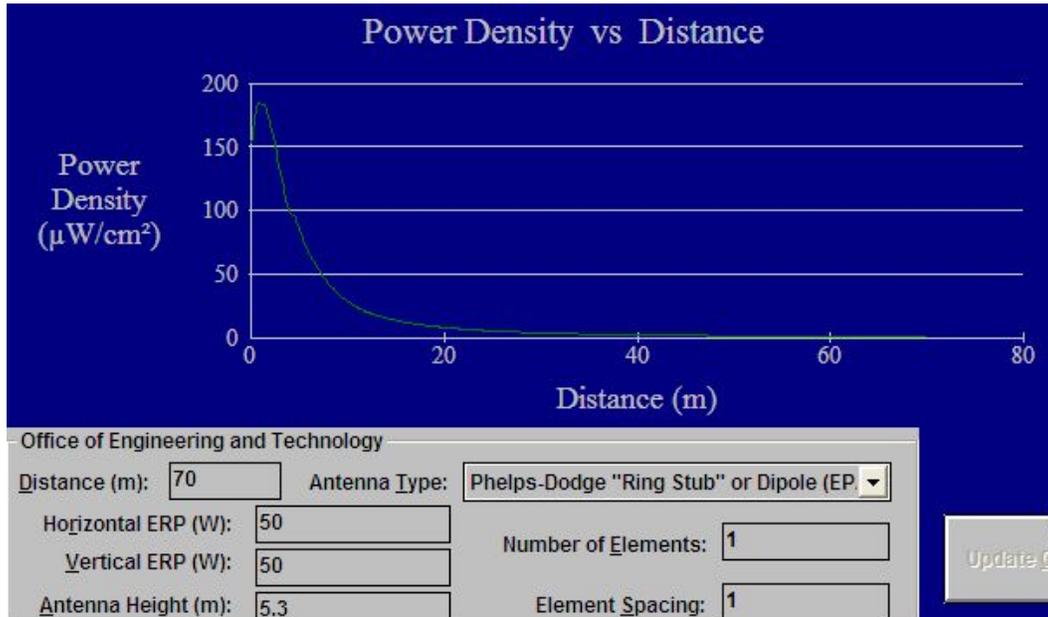


TOWAIR (PASS)

DETERMINATION Results							
PASS SLOPE(100:1)NO FAA REQ - 5658.0 Meters (18562.7 Feet)away & below slope by 150.0 Meters (492.12 Feet)							
Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	34-29-59.00N	118-19-9.00W	AGUA DULCE	LOS ANGELES AGUA DULCE, CA	778.0	1402.0999999999999
Your Specifications							
NAD83 Coordinates							
Latitude						34-28-17.2 north	
Longitude						118-22-13.6 west	
Measurements (Meters)							
Overall Structure Height (AGL)						7	
Support Structure Height (AGL)						0	
Site Elevation (AMSL)						677	
Structure Type							
MAST - Mast							

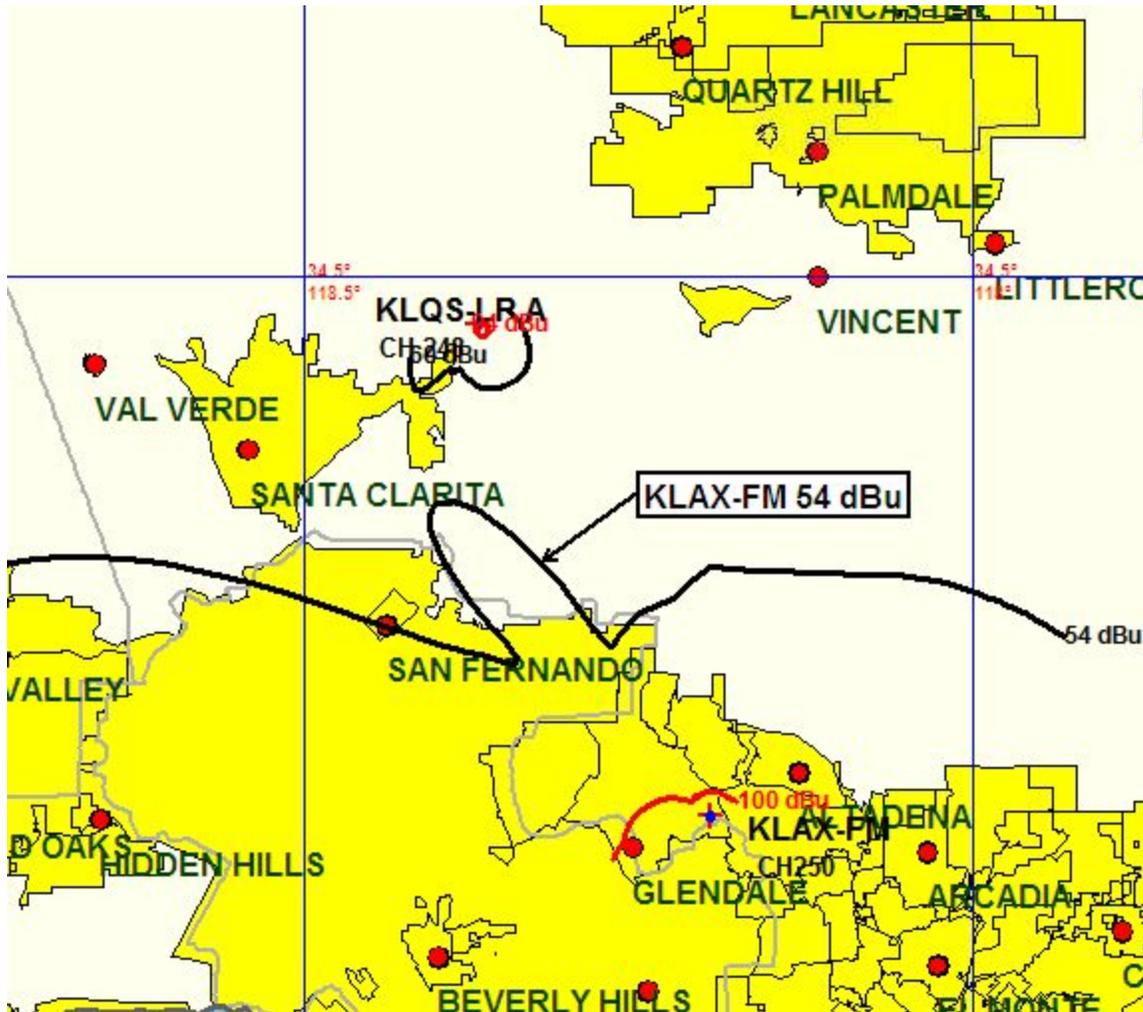
Environmental Compliance

A Phelps-Dodge Ring Stub/Dipole (the worst possible downwards radiation scenario) was used to gauge the maximum RF for the proposal in OET program FM Model for Windows because the desired antenna was not included in the software. This demonstrates a peak exposure of $184.4 \mu\text{W}/\text{cm}^2$ 0.98 m from the antenna for a person 1.7 meters standing under the antenna. This is 92.2% of the FCC's Maximum Permissible Exposure (MPR) for $200 \mu\text{W}/\text{cm}^2$ for Unrestricted Areas so the proposal passes compliance. The antenna is on private property surrounded by field. A RF warning sign shall be posted. In the case any work is done to the facility, it will be powered-down.



Second Adjacent Waiver Request

First, the proposed resides outside of second adjacent channel KLAX-FM's 54 dBu contour (below), even though it is short-spaced. Thus, the KLAX_FM 54 dBu is protected from interference.



The proposed does reside within the 54 dBu of second adjacent channel KAMP-FM. Applicant respectfully requests a "second adjacent channel waiver" with regards to Section 47 C.F.R. Section 73.807 of the FCC rules based upon the "Living Way" precedence (Living Way Ministries, Inc., Memorandum Opinion and Order, 17 FCC Red 17054, 17056, ¶ 5 (2002), recon. denied 23 FCC Red 15070 (2008)). This will be accomplished by the use of a directional antenna protecting populated area, permitted under Section 73.816(c)(2) of the FCC rules.

Using U/D methodology, at the proposed KLQS-LP transmitter location second adjacent channel KAMP-FM has a signal strength of 59.3 dBu. Interference will occur when the KAMP signal strength's interfering signal exceeds the desired signal by 40 dbu. So the area of predicted interference would then be bounded by the 99.3 dBu contour.



The red line delineates the interference area. This contour was generated via V-Soft FM Commander software and outputted to a Google Earth kml file. No population exists within the interference.

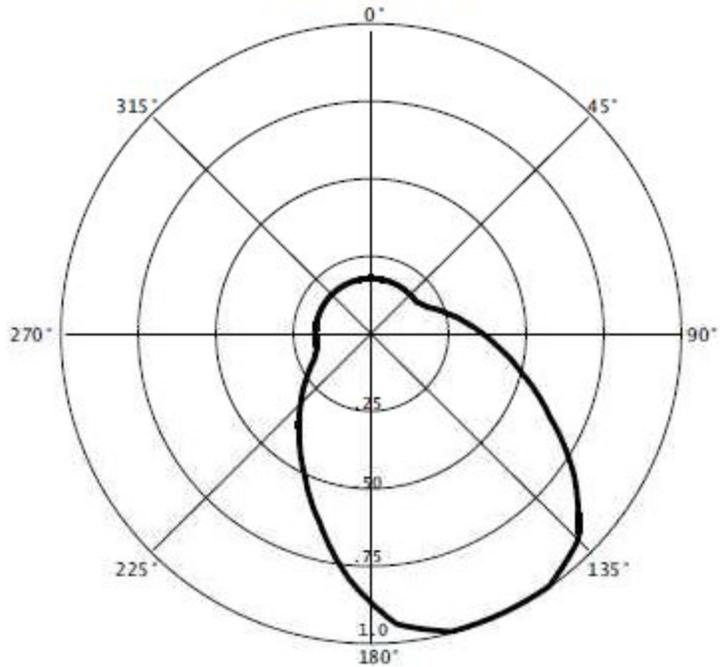
KLQS-LP.A

07-31-2019

RMS(V)= .49

Graph is Relative Field

Azi	Field	dbk	kw
000	0.179	-27.953	0.002
010	0.179	-27.953	0.002
020	0.179	-27.953	0.002
030	0.179	-27.953	0.002
040	0.179	-27.953	0.002
050	0.179	-27.953	0.002
060	0.191	-27.412	0.002
070	0.228	-25.852	0.003
080	0.287	-23.853	0.004
090	0.361	-21.860	0.007
100	0.454	-19.869	0.010
110	0.571	-17.878	0.016
120	0.718	-15.894	0.026
130	0.872	-14.200	0.038
140	0.973	-13.253	0.047
150	1.000	-13.010	0.050
160	1.000	-13.010	0.050
170	0.973	-13.253	0.047
180	0.872	-14.200	0.038
190	0.718	-15.894	0.026
200	0.571	-17.878	0.016
210	0.454	-19.869	0.010
220	0.361	-21.860	0.007
230	0.287	-23.853	0.004
240	0.228	-25.852	0.003
250	0.191	-27.412	0.002
260	0.179	-27.953	0.002
270	0.179	-27.953	0.002
280	0.179	-27.953	0.002
290	0.179	-27.953	0.002
300	0.179	-27.953	0.002
310	0.179	-27.953	0.002
320	0.179	-27.953	0.002
330	0.179	-27.953	0.002
340	0.179	-27.953	0.002
350	0.179	-27.953	0.002



The antenna is a Samco SAM-137 yagi.

Due to zero population within this radiation radius, this meets the "Living Way" Criteria to qualify for a Waiver of 47 C.F.R. Section 73.807.

Thus, the applicant requests second adjacent waiver based upon evidence no interference is proposed.