FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET SW
WASHINGTON DC 20554

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

PROCESSING ENGINEER: Jerome Manarchuck
TELEPHONE: (202) 418-7226
FACSIMILE: (202) 418-1411
MAIL STOP: 1800B3
INTERNET ADDRESS: Jerome.Manarchuck@fcc.gov

JUN 28 2012

EADS Broadcasting Corporation
P.O. Box 749
Albany, OR 97321-0258

Re: EADS Broadcasting Corporation
KGAL, Lebanon, OR
Facility ID No. 18039
FCC File No. BP-20111230ACA

Dear Applicant:

The staff has under consideration the above-captioned application proposing to increase the daytime directional power of AM station KGAL and also change its directional antenna pattern.

Our analysis indicates that there are discrepancies in Tech Box 4 of the FCC Form 301 which need to be addressed. Specifically, the overall height above ground (OHAGL) of each of the towers specified on the Form 301 does not agree with the information in the FCC's Antenna Structure Registration data base (ASR). The applicant specifies a height of 74.3 meters and the ASR data base shows a height of 77.7 meters. Secondly, the height of the radiator above base insulator is specified as 72.5 meters. This does not agree with the KGAL license which shows a height of 76.2 meters. The electrical height of the radiator in degrees was specified to be 144.6°. This value matches the KGAL license and corresponds to a radiator height above the base insulator of 76.2 meters.

Additionally, the KGAL site coordinates do not match the coordinates of either of the registered towers in the array or the center of the array. The proposed NAD27 transmitter site coordinates are N 44° 34′ 25″, W 122° 55′ 05. According to the ASR database the NAD27 coordinates for tower 1 of the array (ASRN 1034246) are N 44° 34′ 25″, W 122° 55′ 08, the NAD27 coordinates for tower 2 of the array (ASRN 1034247) are N 44° 34′ 25″, W 122° 55′ 03, and the NAD27 coordinates for the center of the array are N 44° 34′ 31″, W 122° 55′ 11″.[1]

Finally, the theoretical RMS for the Daytime Operation should be based on an assumed loss

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[1] A representative of the applicant noted that AM stations KSHO and KGAL diplex into the same antenna system. However, according to the FCC's CDBS, the KSHO transmitter site coordinates are N 44° 34′ 30″, W 122° 55′ 15″ (NAD27).

resistance of 1 ohm. Based on our calculations it is believed the proposed theoretical RMS was based on a slightly higher loss resistance (1.05 ohms).

Please submit a corrective amendment addressing the deficiencies described above. Failure to address the deficiency in the pending application within 30 days from the date of this letter may result in dismissal of the application for failure to prosecute under 47 C.F.R. §73.3568(a)(1). If you have questions, you may contact the processing engineer.

Sincerely,

Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau

cc: Ron Erickson
Keith Hammond