



FCC FORM 318 EXHIBIT #11

Interference Analysis and Waiver Request

This Technical Statement is in support of FCC Form 318 filed by Pendleton Community Media ("PCM"), permittee of LPFM station KIPC-LP on Channel 243-L1 as authorized in BNPL-20131113BJA. PCM is seeking a modification of the original Construction Permit to utilize another tower location which is being offered to the local Non-Profit organization at no cost. The Public interest will be served in permitting PCM to modify the Construction Permit of KIPC-LP as requested in the FCC Form 318 "Tech Box" by allowing the local organization to build and operate the LPFM facility in a timely and economical fashion.

This instant application seeks a modification of BNPL-20131113BJA from 45-40-34.0 N x 118-45-11.0 W to 45-41-20.0 N x 118-50-29.0 W, which is a distance of 7.0 km. PCM respectfully requests a waiver of the 5.6 km modification restrictions in Section 73.871(c)(2) in order to accomplish the construction of KIPC-LP in a timely and economical manner.

Section 1.3 of the Rules expressly provides that any provision of the Rules may be waived by the Commission in whole or in part, for good cause shown. An applicant seeking a waiver has the burden to plead with particularity the facts and circumstances that warrant such action and waiver of the Commission's policies or rules is appropriate only if both: (i) special circumstances warrant a deviation from the general rule, and (ii) such deviation will serve the public interest.

This instant request is procedural only and is in the spirit of similar waivers granted for other LPFM licensees and permittees in similar circumstances. In this specific case, PCM will be required to erect the tower at the Construction Permit location; while the offer for tower location to PCM specified herein is especially valuable and will add 1,564 persons (Census 2010 data) to the proposed 60dBu(50,50) contour while affording a significant cost savings to PCM on both construction and operating of the station. While it would be a technical possibility for PCM to construct the station at the location authorized in BNPL-20131113BJA and then make a series of modifications which meet the Section 73.871(c)(2) limitation, the financial burden to PCM would be enormous and the time required would be extensive. This waiver would expedite the ability of PCM to serve the community and minimize the Processing Staff administrative burden.

To accomplish the modification requested herein, PCM is also specifying a change of operating frequency from Channel 243-L1 to Channel 296-L1. This change of channel is required to maintain fully spaced protections to the current allocation scheme of full power facilities in the area, and is made on the "+/- 53/54" basis of utilizing the Intermediate Frequency ("IF") channel to that which is authorized. While not specifically addressed in the LPFM rules, this is consistent with other Part 73 and Part 74 facilities as a minor change. In addition, the substitution of Channel 296-L1 for Channel 243-L1 is consistent with the reduction of interference permitted under 73.870(a)(1).

A comparison of Channel 243-L1 and Channel 296-L1 is as follows:

Search of channel 243 (96.5 MHz Class LP100) at 45-40-34.0 N, 118-45-11.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
KLKY	STANFIELD	OR 241 C2	56.96	53.00	248.5	4.0
KLKY	STANFIELD	OR 241 C2	56.97	53.00	248.5	4.0
KMMG	BENTON CITY	WA 244 A	76.06	56.00	325.0	20.1

Search of channel 296 (107.1 MHz Class LP100) at 45-41-20.0 N, 118-50-29.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
K295AV	WALLA WALLA	WA 295 D	61.57	28.00	56.3	33.6
VAC	ARLINGTON	OR 295 C2	115.88	80.00	263.6	35.9
K297BE	KENNEWICK	WA 297 D	57.92	21.00	335.5	36.9
KFFM	YAKIMA	WA 297 C	159.98	120.00	312.1	40.0
KTNH-LP	WALLA WALLA	WA 297 LP100	53.01	14.00	45.2	39.0

It is clear that Channel 296-L1 is superior in distance separation from adjacent channel stations in the current allocation scheme and is preferred to operation on Channel 243-L1.

In conclusion, PCM respectfully requests consideration of the instant application for relocation of KIPC-LP under these circumstances.