

**Request for Waiver of 47 C.F.R. Section 73.509**

Educational Media Foundation ("EMF") desires to increase the power and service area of station KKRO, Redding, California. This proposal is engineered so as to NOT CAUSE interference to any existing station, known application or allocation. However, the proposed increased service area would RECEIVE interference from the following second adjacent facilities:

Facility ID	Status	Call Sign (or File #)	City of License	Exhibit
10905	App	BPED-19950327MA	Redding, CA	15B-1
77085	App	BPED-19950713MB	Redding, CA	15B-2

Again, this proposal will not cause interference to the above applications as KKRO's proposed interfering 100 dBu contour will not overlap the applications' protected 60 dBu contour. KKRO's proposed protected contour would, however, receive overlap from the applications listed above. The area of "overlap received" from the above referenced facilities will be approximately:

Call Sign (or File #)	Square km	Total area of KKRO's proposed 60 dBu
BPED-19950327MA	6.72	0.28 %
BPED-19950713MB	5.80	0.24 %

The grant of this waiver request will allow KKRO to increase its overall coverage area by 368.08 square kilometers, an increase of 18.34%. It will provide new service to an estimated 57,726 persons, an increase of 711.7%. This waiver request is nearly identical to the requests made by the licensees of WCPE(FM) and WCCE(FM) in Educational Information Corporation, 6 FCC Rcd 2207 (1991). WCPE(FM) requested a waiver in its application to permit *de minimus* overlap "received," and WCCE(FM) requested a waiver in its application to permit *de minimus* overlap "caused." In recognition of the importance of affording noncommercial educational stations the flexibility to expand and meet the growing demand for service, the Commission granted both waiver requests. The instant request fully satisfies the criteria established by the Commission for waiver of Section 73.509 of the Commission's rules as it pertains to overlap received\*.

Significant service will be maintained and enhanced by the proposed expansion of KKRO, and the overlap area is very small and well within the scope of the Commission's waiver policy. Clearly, this benefit heavily outweighs the potential for interference in an area that constitutes less than 1% (total) of the station's proposed service area. Accordingly EMF respectfully submits that a waiver of Section 73.509(a) of the Commission's rules is justified in this instance.

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\* EMF wishes to emphasize that its request is not at all similar to the second waiver request made by WCPE in Educational Information Corporation, 1997 FCC LEXIS 2636 (May 20, 1997). Unlike here, WCPE was seeking a waiver of overlap "caused" in that second case.



### Exhibit 15B-1

#### KKRO.P

Latitude: 40-54-53 N  
Longitude: 122-26-37 W  
ERP: 0.37 kW  
Channel: 218  
Frequency: 91.5 MHz  
AMSL Height: 1210.0 m  
Pattern: Directional

#### 950327MA

BPED19950327MA  
Latitude: 40-39-14 N  
Longitude: 122-31-12 W  
ERP: 1.80 kW  
Channel: 216  
Frequency: 91.1 MHz  
AMSL Height: 978.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No

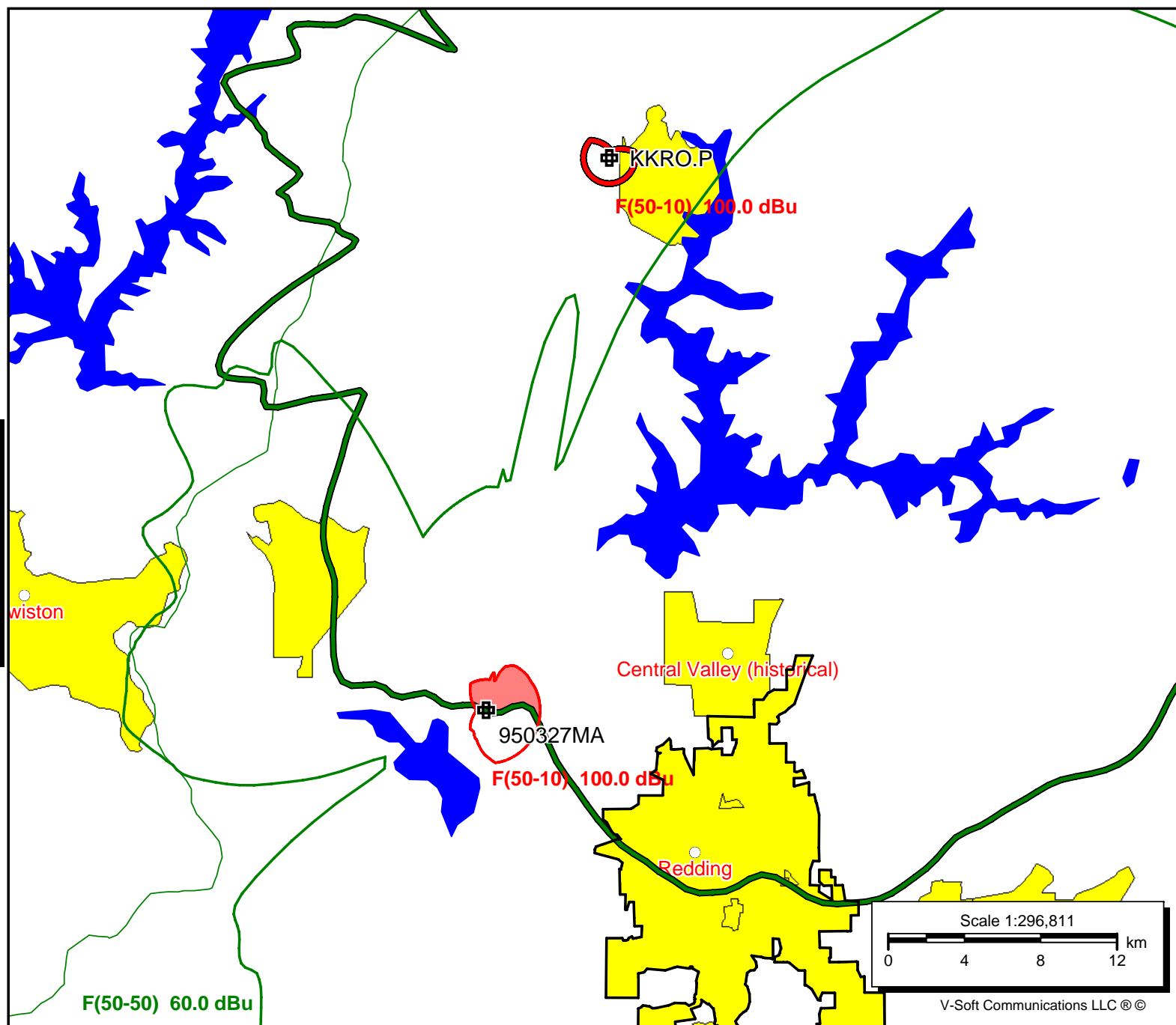


Exhibit 15B-1

V-Soft Communications Population Report

KKRO.P / 950327MA

This overlap region consists of the intersection of the following contours:

KKRO.P: FCC F(50-50) 60.00 dBu

950327MA: FCC F(50-10) 100.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 0

Total Housing Units Within Overlap Region: 0

Total Area Within Overlap Region: 6.72 sq. km

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KKRO.P: FCC F(50-50) 60.00 dBu

Transmitter Information:

Call Letters: KKRO.P

File Number: BLED20021119ABO

Latitude: 40-54-53 N

Longitude: 122-26-37 W

ERP: 0.37 kW

Channel: 218

Frequency: 91.5 MHz

AMSL Height: 1210.0 m

Elevation: 1199.0 m

Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No

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950327MA: FCC F(50-10) 100.00 dBu

Transmitter Information:

Call Letters: 950327MA

File Number: BPED19950327MA

Latitude: 40-39-14 N

Longitude: 122-31-12 W

ERP: 1.80 kW

Channel: 216

Frequency: 91.1 MHz

AMSL Height: 978.0 m

Elevation: 969.0 m

Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No



### Exhibit 15B-2

#### KKRO.P

Latitude: 40-54-53 N  
Longitude: 122-26-37 W  
ERP: 0.37 kW  
Channel: 218  
Frequency: 91.5 MHz  
AMSL Height: 1210.0 m  
Pattern: Directional

#### 950713MB

BPED19950713MB  
Latitude: 40-39-14 N  
Longitude: 122-31-12 W  
ERP: 1.80 kW  
Channel: 216  
Frequency: 91.1 MHz  
AMSL Height: 986.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No

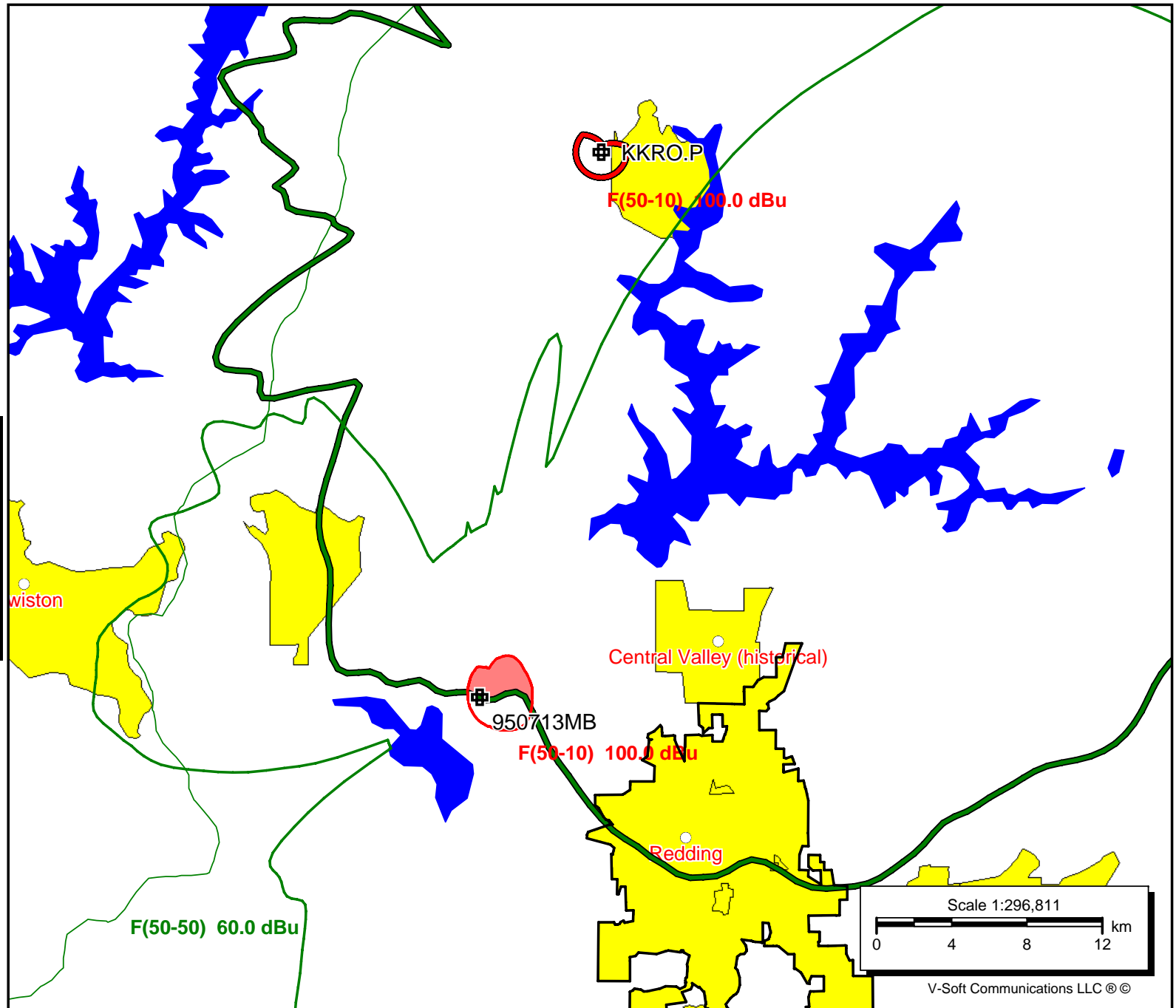


Exhibit 15B-2

V-Soft Communications Population Report

KKRO.P / 950713MB

This overlap region consists of the intersection of the following contours:

KKRO.P: FCC F(50-50) 60.00 dBu

950713MB: FCC F(50-10) 100.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 0

Total Housing Units Within Overlap Region: 0

Total Area Within Overlap Region: 5.80 sq. km

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KKRO.P: FCC F(50-50) 60.00 dBu

Transmitter Information:

Call Letters: KKRO.P

File Number: BLED20021119ABO

Latitude: 40-54-53 N

Longitude: 122-26-37 W

ERP: 0.37 kW

Channel: 218

Frequency: 91.5 MHz

AMSL Height: 1210.0 m

Elevation: 1199.0 m

Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No

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950713MB: FCC F(50-10) 100.00 dBu

Transmitter Information:

Call Letters: 950713MB

File Number: BPED19950713MB

Latitude: 40-39-14 N

Longitude: 122-31-12 W

ERP: 1.80 kW

Channel: 216

Frequency: 91.1 MHz

AMSL Height: 986.0 m

Elevation: 968.0 m

Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No