

COMMUNITY COVERAGE
Journal Broadcast Corporation
Tucson, AZ

Table 22.0(a) lists the predicted principal community contour (3.16 mV/m) for the licensed KZPT facilities. Likewise, Table 22.0(b) lists the predicted 3.16 mV/m contour for the proposed KZPT facilities. These contours were calculated pursuant to Section 73.313 of the FCC Rules using terrain data extracted from the NGDC 30 second terrain database and are shown in relation to the Tucson city limits in Figure 22.0. As demonstrated by this figure, neither of these facilities provide the required 3.16 mV/m coverage to at least 80% of Tucson, which is necessary under current FCC policy to achieve substantial compliance with Section 73.315(a) of the FCC Rules. The city of Tucson encompasses a total land area 324.5 square kilometers. The present KZPT 3.16 mV/m contour encompasses 123.3 square kilometers or 38.0% of Tucson. The 3.16 mV/m contour for the proposed KZPT facilities will encompass 203.1 square kilometers or 62.6% of Tucson. This amounts to 24.6% increase in principal community coverage by the proposed facilities. It should be noted that Channel 281A was allotted to Tucson, Arizona, in the November 8, 1985 Memorandum Opinion and Order in MM Docket 84-231. In this Memorandum Opinion and Order the FCC recognized that because of the size of Tucson, a Class A station would not be able not provide city grade coverage to all of this community and on its own motion waived Section 73.315 of its Rules to permit the allotment of this channel to Tucson, Arizona. Based upon the above information, it felt that a waiver of Section 73.315(a) of the FCC Rules should not be required for the facilities proposed in the instant application. Should such a waiver be deemed necessary by the FCC, however, a waiver of Section 73.315(a) of the FCC Rules is respectfully requested.

KZPT(LIC) CH281A
 70.0 dBu CONTOUR
 (F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk) (kW)		DISTANCE TO CONTOUR (km)
0.0 *	760.7	73.3	4.77	3.000	11.6
45.0 *	1046.1	-212.1	4.77	3.000	7.4
90.0 *	768.1	65.9	4.77	3.000	11.1
135.0 *	738.0	96.0	4.77	3.000	13.2
180.0 *	764.3	69.7	4.77	3.000	11.4
225.0 *	851.0	-17.0	4.77	3.000	7.4
270.0 *	826.5	7.5	4.77	3.000	7.4
315.0 *	671.7	162.3	4.77	3.000	17.5

AVERAGE(*) =	803.3	meters			

TABLE 22.0(a)

KZPT PRESENT
3.16 mV/m CONTOUR

Journal Broadcast Corp.
 Tucson, AZ

KZPT PROPOSED CH281A
 70.0 dBu CONTOUR
 (F(50,50) Curves Utilized)

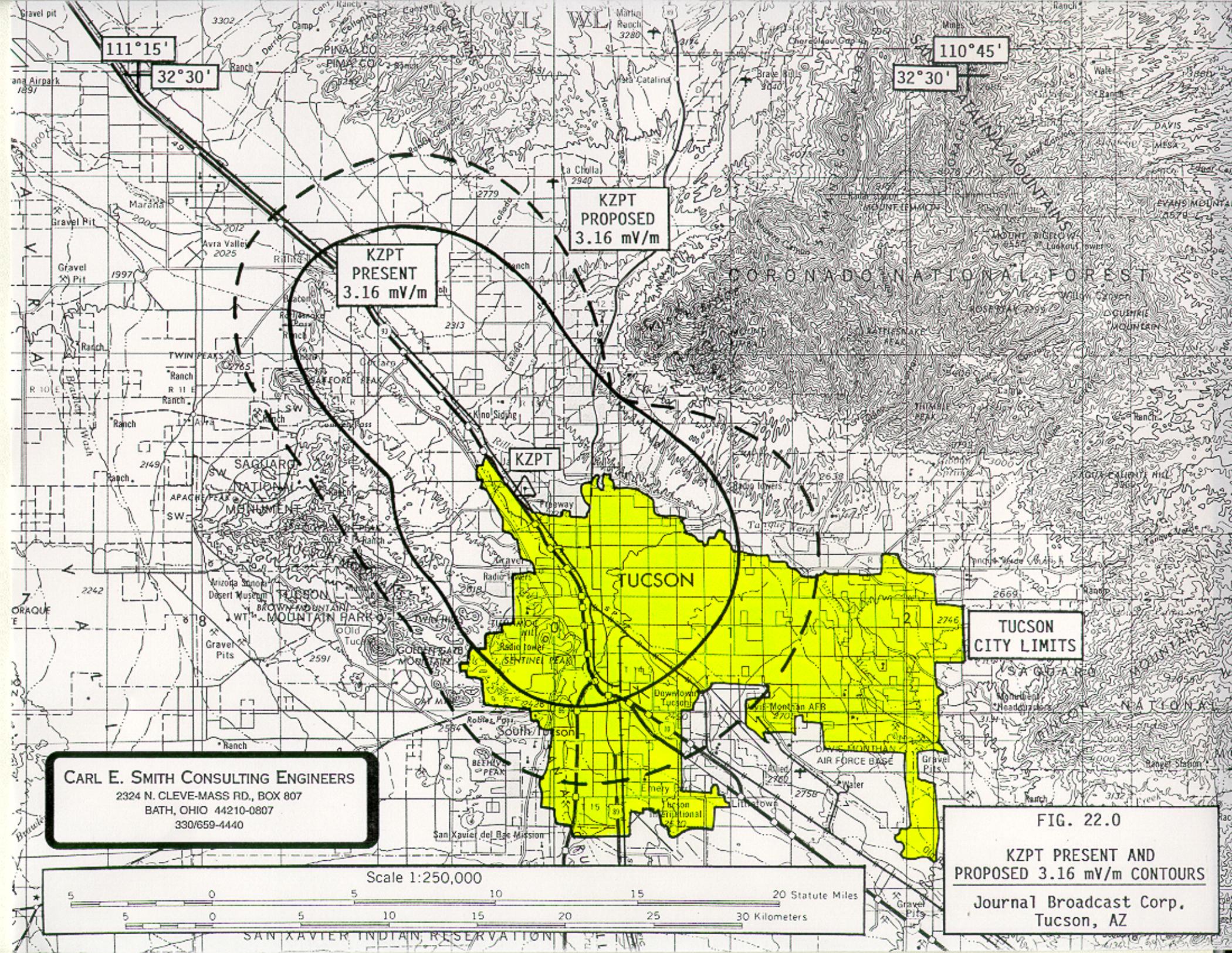
BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk) (kW)		DISTANCE TO CONTOUR (km)
0.0 *	760.6	142.5	4.77	3.000	16.2
45.0 *	1045.6	-142.5	4.77	3.000	7.4
90.0 *	767.9	135.2	4.77	3.000	15.7
135.0 *	737.8	165.3	4.77	3.000	17.7
180.0 *	764.7	138.4	4.77	3.000	15.9
225.0 *	850.7	52.4	4.77	3.000	10.0
270.0 *	826.8	76.3	4.77	3.000	11.8
315.0 *	671.7	231.4	4.77	3.000	20.8

AVERAGE(*) = 803.2 meters

TABLE 22.0(b)

KZPT PROPOSED
3.16 mV/m CONTOUR

Journal Broadcast Corp.
 Tucson, AZ



111°15'

32°30'

110°45'

32°30'

**KZPT
PRESENT
3.16 mV/m**

**KZPT
PROPOSED
3.16 mV/m**

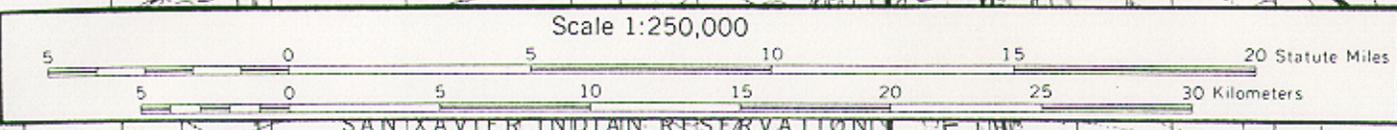
KZPT

TUCSON

**TUCSON
CITY LIMITS**

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FIG. 22.0
**KZPT PRESENT AND
 PROPOSED 3.16 mV/m CONTOURS**
**Journal Broadcast Corp.,
 Tucson, AZ**



SAN XAVIER INDIAN RESERVATION