

Part 1 - Channel Study

REFERENCE		CH# 201C3-		88.1 MHz, Pwr= 1.2 kW, HAAT=321.0M,		COR= 2348.1 M		DISPLAY DATES			
39 40 18.0 N.				Average Protected F(50-50)= 33.8 km				DATA 04-21-07			
105 13 05.0 W.								SEARCH 04-24-07			
CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kW)	INT(km)	PRO(km)	*IN*	*OUT*	
CITY		STATE	<--	FILE #	LNG.	HAAT(M)	COR(M)	LICENSEE	(Overlap in km)		
201A	KFDN	LIC	VX	0.0	0.00	39 40 18.0	0.430	91.3	32.1	-131.86*	-138.46*
Lakewood		CO		0.0	BLED20041202AGK	105 13 05.0	472	2348	Educational Media Foundati		
06-2E	KRMATV	LI	HY	337.3	7.06	39 43 49.0	100.000		106.0	161.7R	-154.6M
Denver		CO		157.2	BLET19950504KE	105 15 00.0	292	2349	Rocky Mountain Public Broa		
06-2E	KRMATV	CP	DCY	23.8	0.24	39 40 25.0	100.000		2.2	88.8R	-88.6M
Denver		CO		203.8	BPET19990107KE	105 13 01.0	342	2363	Rocky Mountain Public Broa		
**203A	KGNU-FM	LIC	CN	8.9	36.03	39 59 32.0	1.300	1.6	10.8	-8.43*	22.88
Boulder		CO		188.9	BLED1807	105 09 10.0	-3	1731	Boulder Community Broadcas		
*201C3	KWYH	APP	VX	14.6	170.97	41 09 37.0	47.000	116.9	30.2	9.56	26.22
Cheyenne		WY		194.9	BPED20070327AEO	104 42 13.0	42	1890	Educational Media Foundati		
202A	KLHV	LIC	VX	355.0	105.44	40 37 03.0	0.150	35.0	22.9	30.65	21.81
Fort Collins		CO		174.9	BLED20060117AFJ	105 19 40.0	403	2552	Educational Media Foundati		
204C1	KCME	LIC	CY	163.3	107.45	38 44 40.0	12.000	6.8	77.3	67.38	27.97
Manitou Springs		CO		343.5	BLED19990203KA	104 51 41.0	819	2918	Cheyenne Mountain Public B		
201C2	KDNK	LIC	DEX	262.0	187.05	39 25 08.0	0.990	133.4	57.8	35.45	69.10
Glenwood Springs		CO		80.7	BLED20041022ABU	107 22 10.0	1122	3227	Carbondale Community Acces		
201A	KWYH	LIC	CX	14.6	170.97	41 09 37.0	1.000	42.6	11.9	83.91	44.56
Cheyenne		WY		194.9	BLED20060221ABY	104 42 13.0	42	1890	Educational Media Foundati		
202C1	KTPL	LIC	CX	174.3	192.68	37 56 40.0	65.000	103.4	71.0	65.09	85.46
Pueblo		CO		354.4	BLED20050309AAH	104 59 56.0	340	2593	Educational Communications		

Terrain database is NGDC 30 SEC

ERP and HAAT on direct-line with reference station.

• affixed to TV6 Margin= no direct-line contour overlap.

""affixed to 'IN' or 'Out' values = site inside protected contour.

* see part 2, waiver request

** see exhibit 16-A for contour map

Part 2 - 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 KFDN, Lakewood, Colorado. 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 facility (see exhibit 16-B for a contour map of the interference area):

Facility ID	Status	Call Sign (or File #)	City of License
6512	LIC	BLED-1807	Boulder, CO

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

Call Sign (or File #)	Square km	Total area of KFDN's proposed 60 dBu
KGNU-FM	10.29	0.28%

The grant of this waiver request will allow KFDN to increase its overall coverage area by 1,353 square kilometers, an increase of 59%. It will provide new service to an estimated 267,314 persons, an increase of 14%. 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 KFDN, 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.

* 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 16 - A

FMCommander Single Allocation Study
04-27-2007

KFDN CH 201 C3
1.2 kW 2348.1 M COR
Prot. = 60 dBu
Intef. = 40 dBu

KWYH-A CH 201 C3 BPED20070327AEO
47.0 kW, 1890 M COR
Prot. = 60 dBu
Intef. = 40 dBu

Scale = 1:4,000,000

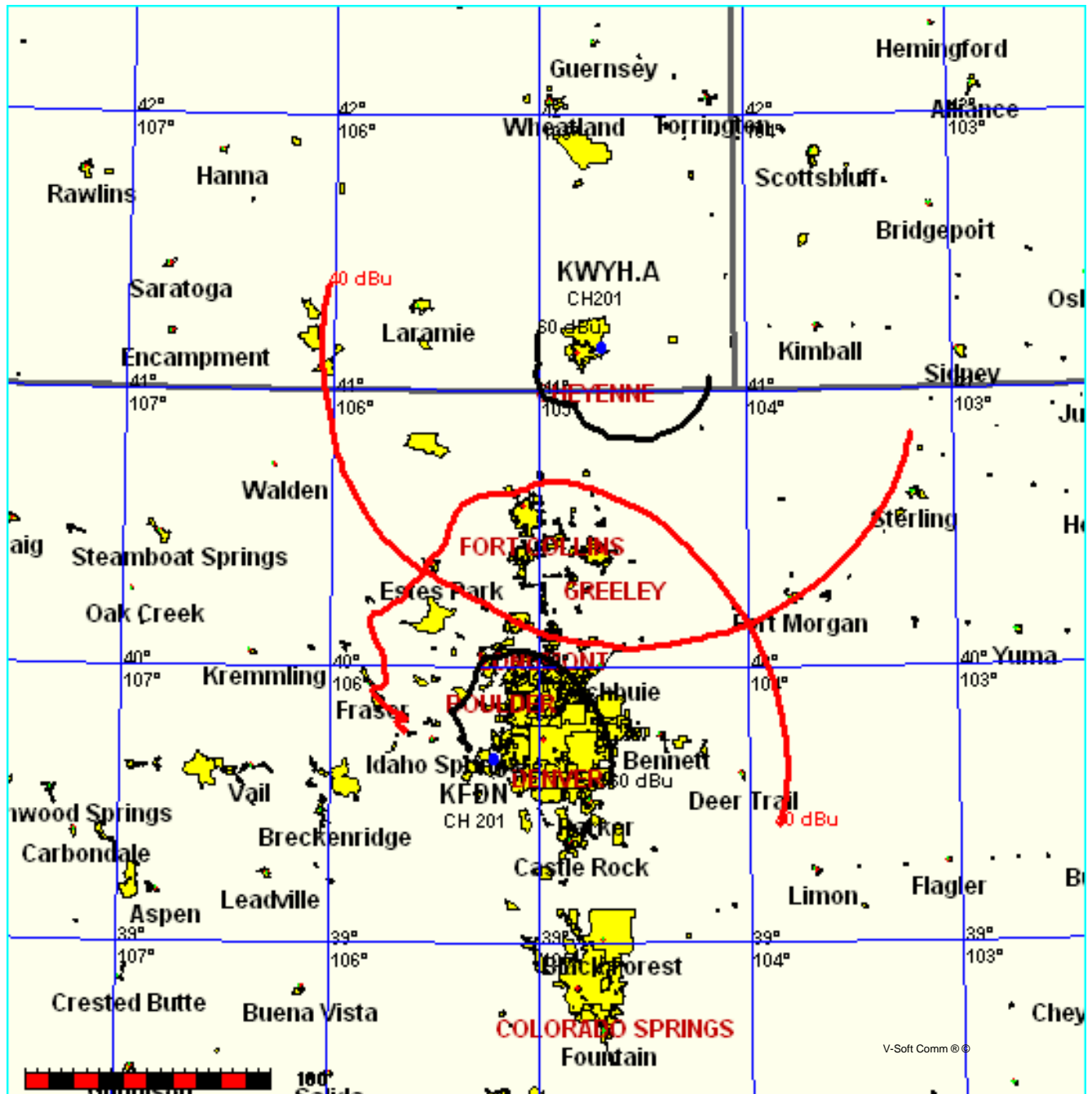


Exhibit 16 - B

KFDN

Latitude: 39-40-18 N
Longitude: 105-13-05 W
ERP: 1.20 kW
Channel: 201
Frequency: 88.1 MHz
AMSL Height: 2348.1 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KGNU-F

BLED1807
Latitude: 39-59-32 N
Longitude: 105-09-10 W
ERP: 1.30 kW
Channel: 203
Frequency: 88.5 MHz
AMSL Height: 1731.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

Contour Color Legend

