

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

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	BLEDD-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.

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



