

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**K296AL, Crested Butte, CO to Colorado Springs, CO, Channel 266**  
**FM Translator Facility ID. 25634**  
**July, 2016**

The Applicant proposes to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.<sup>1</sup> The FM translator will relocate, change frequency and rebroadcast Class B AM station KZNT(AM), Colorado Springs, CO (Facility ID 70825). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached are two maps which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) and first-adjacent channel (See Exhibit 2) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

As shown on Exhibit 3, the proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect third-adjacent channel station KXCL(FM), Rock Creek Park, CO (Channel 269A). The required protection to second-adjacent channel station KGFT(FM), Pueblo, CO (Channel 264C) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of KGFT(FM) resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, KGFT(FM) is predicted to produce an F(50,50) signal strength of 110 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator’s relevant interfering contour is the 150 dBu contour relative to KGFT(FM). According to free space calculations, the translator’s

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<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

predicted interfering contour will extend only 2.2 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 15 meters above ground level, the predicted interference area will neither reach ground level nor reach any people. Therefore, the proposed minor change will cause no interference to any population served by KGFT(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been “demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable”.

**Section 74.1204 CoChannel  
Contour Overlap Study**  
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**Exhibit 1      July, 2016**

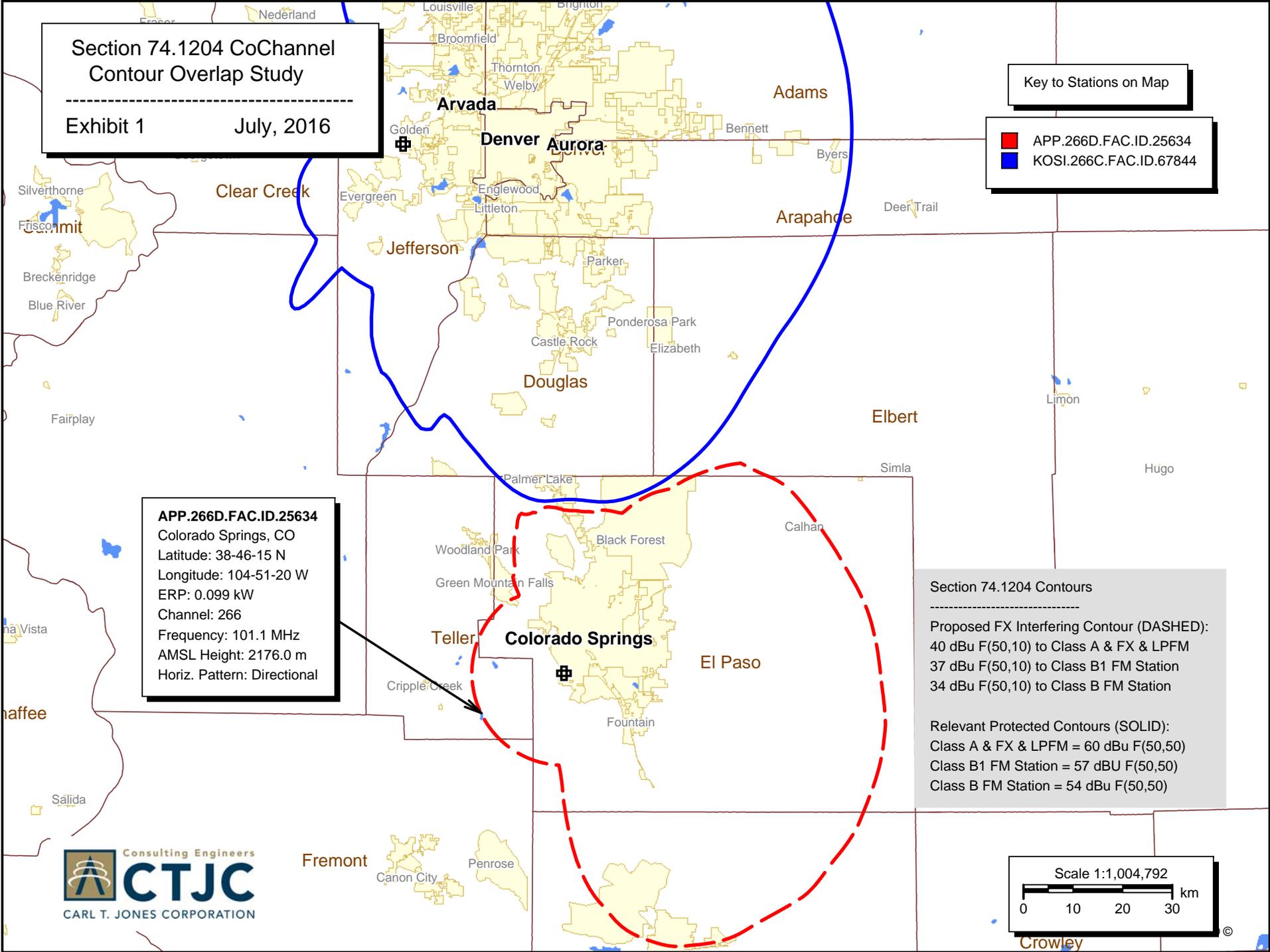
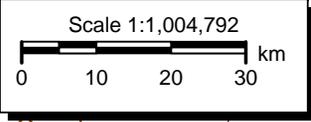
**Key to Stations on Map**

- APP.266D.FAC.ID.25634
- KOSI.266C.FAC.ID.67844

**APP.266D.FAC.ID.25634**  
 Colorado Springs, CO  
 Latitude: 38-46-15 N  
 Longitude: 104-51-20 W  
 ERP: 0.099 kW  
 Channel: 266  
 Frequency: 101.1 MHz  
 AMSL Height: 2176.0 m  
 Horiz. Pattern: Directional

**Section 74.1204 Contours**  
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**Proposed FX Interfering Contour (DASHED):**  
 40 dBu F(50,10) to Class A & FX & LPFM  
 37 dBu F(50,10) to Class B1 FM Station  
 34 dBu F(50,10) to Class B FM Station

**Relevant Protected Contours (SOLID):**  
 Class A & FX & LPFM = 60 dBu F(50,50)  
 Class B1 FM Station = 57 dBu F(50,50)  
 Class B FM Station = 54 dBu F(50,50)



# Section 74.1204 First-Adjacent Channel Contour Overlap Study

Exhibit 2

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### Key to Stations on Map

- APP.266D.FAC.ID.25634
- KFEZ.267.FAC.ID.164170
- K267BR.CP.267D.FAC.ID.139103

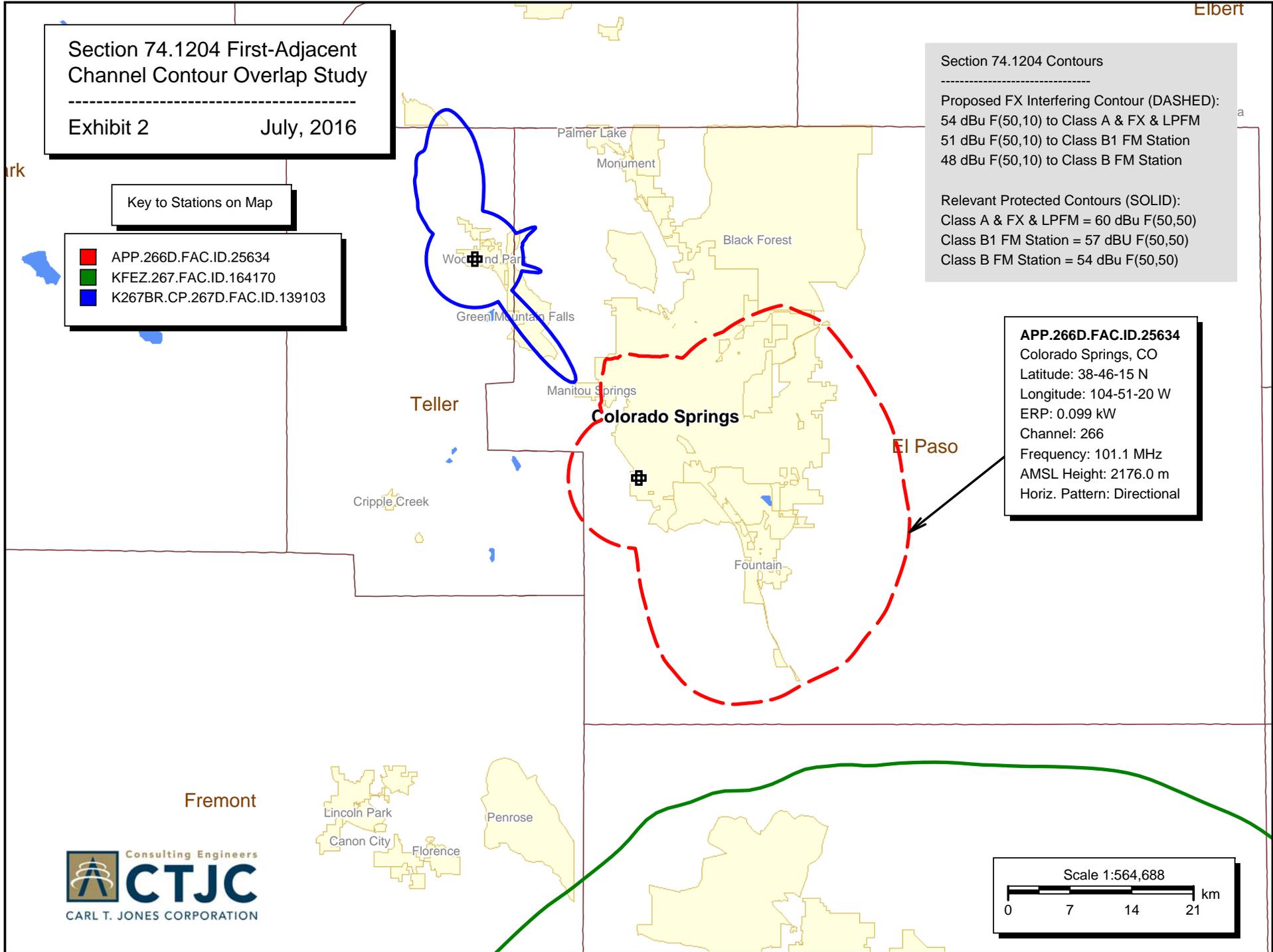
### Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):  
 54 dBu F(50,10) to Class A & FX & LPFM  
 51 dBu F(50,10) to Class B1 FM Station  
 48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
 Class A & FX & LPFM = 60 dBu F(50,50)  
 Class B1 FM Station = 57 dBu F(50,50)  
 Class B FM Station = 54 dBu F(50,50)

### APP.266D.FAC.ID.25634

Colorado Springs, CO  
 Latitude: 38-46-15 N  
 Longitude: 104-51-20 W  
 ERP: 0.099 kW  
 Channel: 266  
 Frequency: 101.1 MHz  
 AMSL Height: 2176.0 m  
 Horiz. Pattern: Directional



# Section 74.1204 2nd & 3rd Adjacent Channel Contour Overlap Study

Exhibit 3

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**Section 74.1204 Contours**

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Proposed FX Interfering Contour (SMALL):  
100 dBu F(50,10) to Class A & FX & LPFM  
97 dBu F(50,10) to Class B1 FM Station  
94 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

**APP.223D.FAC.ID.25634**  
Colorado Springs, CO  
Latitude: 38-46-15 N  
Longitude: 104-51-20 W  
ERP: 0.099 kW  
Channel: 266  
Frequency: 101.1 MHz  
AMSL Height: 2176.0 m  
Horiz. Pattern: Directional

Key to Stations on Map

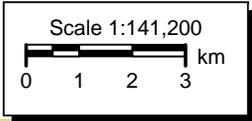
- APP.223D.FAC.ID.25634
- KXCL.269A.FAC.ID.164277



Colorado Springs



KXCL.269A.FAC.ID.164277



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