Consulting Engineers
CTJC
CARL T. JONES CORPORATION

STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF A REQUEST FOR
SPECIAL TEMPORARY AUTHORITY
KHCM-FM, HONOLULU, HAWAII
LIC: CH. 248C1, 80.0 kW ERP, 14 m HAAT
STA: CH. 248, 17 kW ERP (DA-MAX), 565 m HAAT
FCC FACILITY ID. 34620

Applicant: Salem Media of Hawaii, Inc.

I am a Radio Engineer, an employee in the firm of Cart T. Jones Corporation with offices located in Springfield, VA. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Salem Media of Hawaii, Inc. ("Salem"), licensee of KHCM-FM, Honolulu, HI, to prepare this statement in support of a request for Special Temporary Authority ("STA") to operate from an alternate transmitter site during work on the station's main antenna support structure.

The KHCM-FM main antenna is mounted on a specially designed support pole atop the Ala Moana Hotel in downtown Honolulu. On April 2, 2019, Salem filed a request for STA to operate KHCM-FM at an alternate site during the time that the support pole was scheduled to be painted. Numerous delays in the project caused the STA to be extended until its most recent expiration date of June 4, 2019. Now it can be reported that necessary repair work on the tower and rooftop (work which had been delaying the tower painting project) has been completed and the tower is now ready to be painted.

Therefore, Salem requests the renewal of the STA which expired on June 4, 2019 so that KHCM-FM may maintain service to the public during the time of the

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scheduled maintenance at its main antenna site. As previously authorized, the temporary KHCM-FM facility will utilize co-owned station KAIM-FM's directional antenna (FCC License No. BLH-19990430KB[1]).

The technical details of the proposed STA are as follows:

Geographic Coordinates:	21-23-45 N.L. & 158-05-58 W.L. (NAD-27)
FCC ASR Number:	1218023
Channel:	248 (97.5 MHz)
Effective Radiated Power:	17 kW (DA-MAX)
Antenna manufacturer and type:	Shively 6014-14/1-DA[2]
Transmitter power output:	0.59 kW
Antenna height:	
above ground:	39 meters
above mean sea level:	734 meters
above average terrain:	565 meters

Exhibit 1 is a map which depicts the predicted 60 dBu F(50,50) coverage contours from both the presently licensed KHCM-FM technical facility and from the proposed KHCM-FM temporary facility. As shown on Exhibit 1, the 60 dBu coverage from the temporary facility extends the KHCM-FM licensed 60 dBu contour only over the Pacific Ocean with the exception of the unavoidable contour extension over the arc from 358° through 0° to 55° true. It is submitted that this contour extension is simply unavoidable given the terrain difference and distance between the two transmitter sites. If KHCM-FM were forced to reduce the temporary power further in an attempt to remain wholly with main station's terrain null to the north-northeast, meaningful coverage of the KHCM-FM community of license would be lost and it is questionable whether the antenna/transmitter combination would be stable at such minimal powers. Accordingly,

[1] A copy of the KAIM-FM license is attached. The proposed KHCM-FM temporary technical facility will operate as KAIM-FM is licensed except at a reduced maximum power (17 kW) and a different frequency (Channel 248, 97.5 MHz).

[2] The antenna manufacturer's measured directional antenna pattern and tabulation using the KAIM-FM antenna at the KHCM-FM frequency is attached.

the Applicant respectfully requests that the KHCM-FM temporary facility be permitted to slightly extend the KHCM-FM licensed 60 dBu contour area considering the following factors:

- the vast majority of the 60 dBu contour extension is over water,
- the short term of the requested STA,
- the fact that the identical technical facility was authorized for use by KHCM-FM under a prior STA,
- the desire to maintain meaningful coverage to the community,
- the temporary transmission system may not be stable at lower power levels,
- the convenience of the temporary operation, as it requires no construction and all equipment is in place.

Finally, considering the RFR considerations for temporary facility and the FCC monitoring station limitations, the proposed STA facility will use an existing antenna which is authorized to operate with a maximum ERP of 100 kW (for KAIM-FM). The proposed KHCM-FM maximum power level of 17 kW will therefore easily satisfy the field strength limit at the monitoring station given that it would be 7.7 dB below the authorized KAIM-FM field strength in all directions. Similarly, considering an ERP of 17 kW (DA-MAX) from the Shively 14-bay antenna, the temporary facility would contribute a negligible predicted power density of less than 5% of the uncontrolled FCC guideline value beyond 11.7 meters (38 feet) from the tower base.[3] The remote mountaintop site is marked and secured such that casual public access within this distance to the tower is not possible.

[3] The FCC's FM Model Program was used to predict the KHCM-FM power density contribution.

Conclusion

It is respectfully requested that KHCM-FM be permitted to operate from the KAIM-FM antenna at the reduced power requested herein in order to maintain service to the public during the time in which it must shut down its main transmission system to protect maintenance personnel. The Applicant requests authority to operate as requested herein for a period not to exceed 30 days.

This statement and the supporting exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: June 26, 2019

William J. Getz

United States of America

FEDERAL COMMUNICATIONS COMMISSION

FM BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

SALEM MEDIA OF HAWAII, INC.
4880 SANTA ROSA ROAD
SUITE 300
CAMARILLO CA 93012

Brian J. Butler
Supervisory Engineer
Audio Division
Media Bureau

Grant Date: August 20, 2001

This license expires 3:00 a.m. local time, February 01, 2006.

Facility Id: 10950

Call Sign: KAIM-FM

License File Number: BLH-19990430KB

This License Covers Permit No.: BPH-19990421IA

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Name of Licensee: SALEM MEDIA OF HAWAII, INC.

Station Location: HI-HONOLULU

Frequency (MHz): 95.5

Channel: 238

Class: C

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: 3.6 kW

Antenna type: Directional

Description: SHI 6014, 14 SECTIONS

Antenna Coordinates: North Latitude: 21 deg 23 min 45 sec

West Longitude: 158 deg 05 min 58 sec

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW):	100	100
Height of radiation center above ground (Meters):	39	39
Height of radiation center above mean sea level (Meters):	734	734
Height of radiation center above average terrain (Meters):	565	565

Antenna structure registration number: 1218023

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

Special operating conditions or restrictions:

1 The relative field strength of neither the measured horizontally nor vertically polarized radiation component shall exceed at any azimuth the value indicated on the composite radiation pattern authorized by construction permit BPH-19990421IA.

A relative field strength of 1.0 on the composite radiation pattern herein authorized corresponds to the following effective radiated power:

100 kilowatts.

Principal minimum and its associated field strength limit:

220 - 320 degrees True: 4.0 kilowatts.

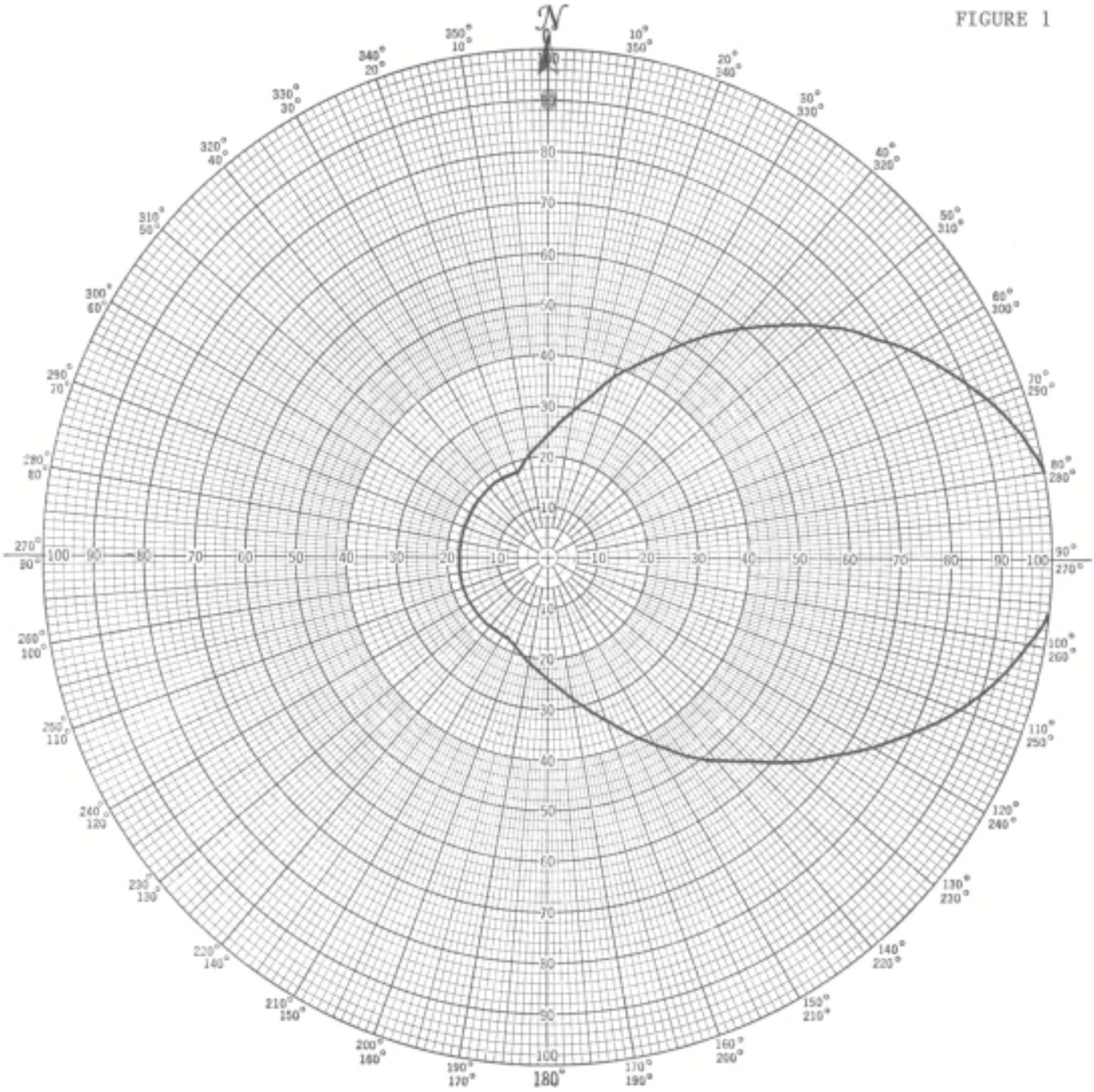
Special operating conditions or restrictions:

2 The authority granted herein is subject to the condition that the field strength from the licensee's transmitter shall not exceed 27 mV/m as measured at the Federal Communications Commission's Honolulu, Hawaii monitoring station. In the event of interference to monitoring, direction finding, or related operations at the Federal Communications Commission's Honolulu, Hawaii monitoring station caused by either harmonic or spurious radiation, the licensee shall take such immediate corrective action as is necessary to eliminate the interference. This shall include responsibility for furnishing, installing, and adjusting transmitter filter circuits, shielding, or other corrective devices. If these measures fail to eliminate interference to FCC operations caused by the presence of the licensee's signal, or if the field strength exceeds 27 mV/m, the licensee shall immediately reduce power to the extent necessary to eliminate the interference and to comply with field limit. After determining this lower power level, the licensee shall immediately apply for a Special Temporary Authority (STA) and shall file an application to the Commission for the altered parameters.

3 The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

*** END OF AUTHORIZATION ***

FIGURE 1



Shively Labs

PROJECT NAME KPOI HONOLULU, HI

PROJECT NUMBER A00674 DATE 12/1/99

MODEL (X) FULL SCALE ( ) FREQUENCY 438.75/97.5 MHz

POLARIZATION COMPOSITE

CURVE PLOTTED IN: VOLTAGE (X) POWER( ) DB( )

OBSERVER RAS

ANTENNA TYPE 6014-14/1-DA

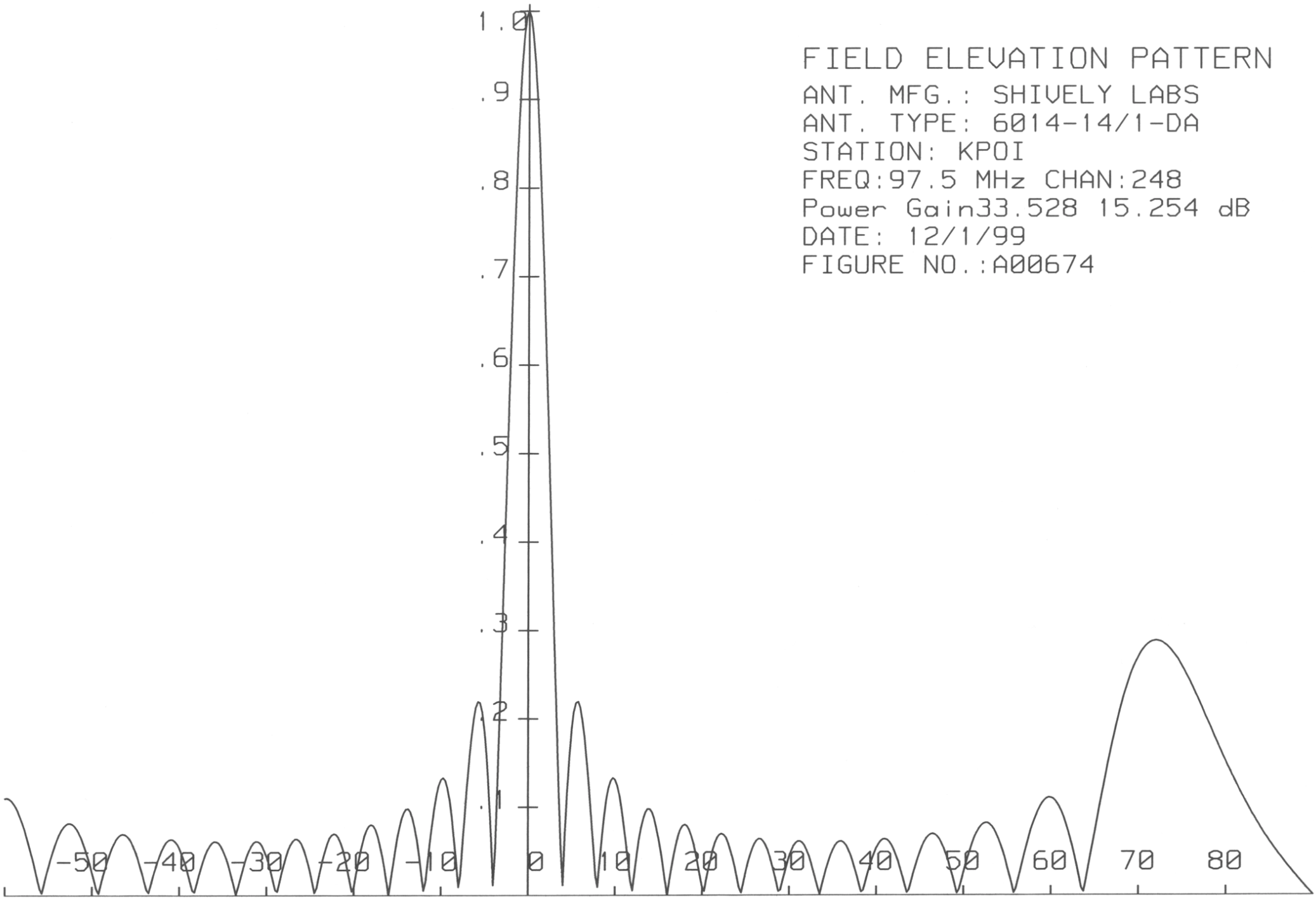
PATTERN TYPE DIRECTIONAL AZIMUTH

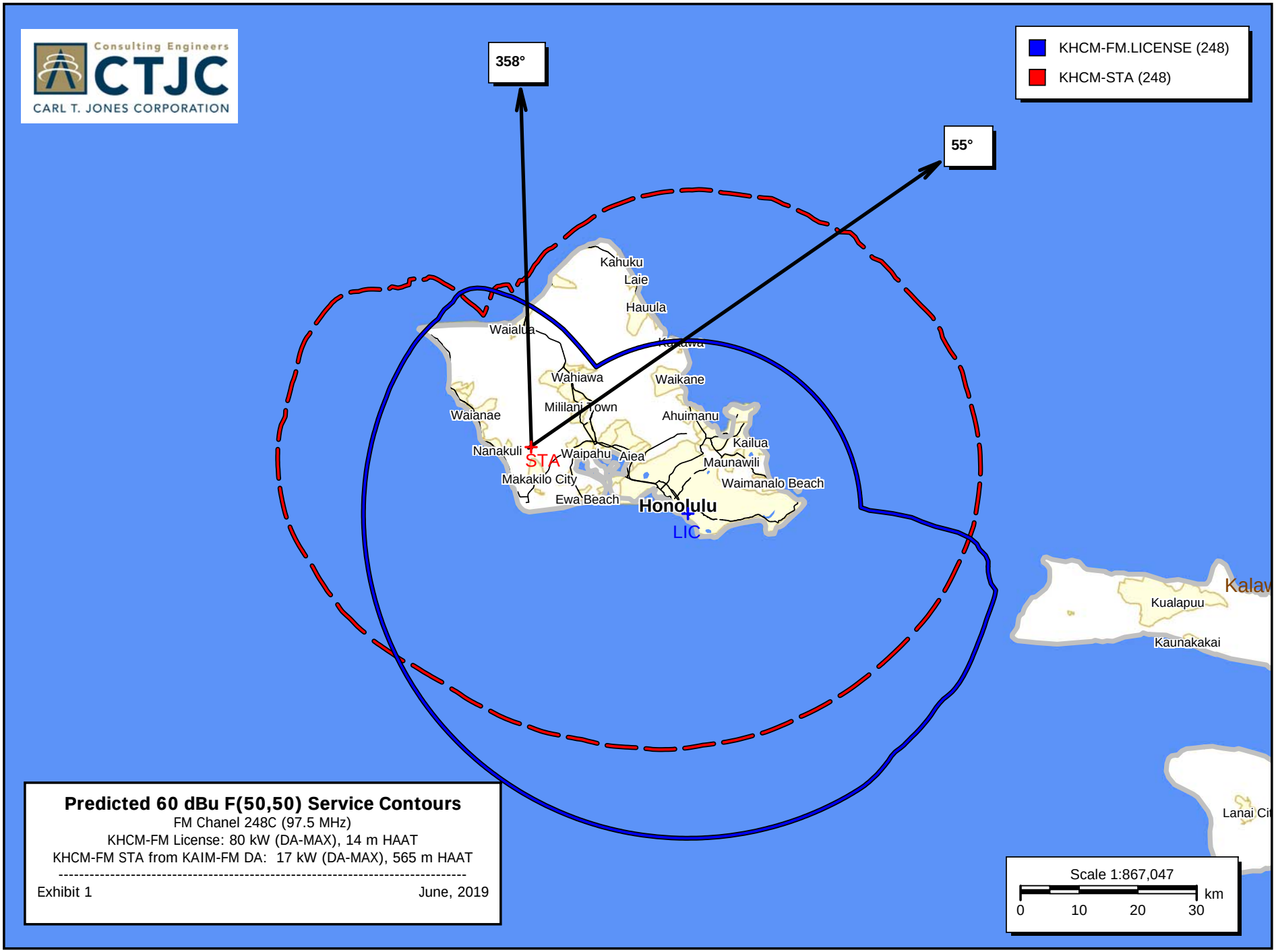
REMARKS:

Figure 1A

INQUIRY #A00674
TABULATION OF COMPOSITE PATTERN
KPOI Honolulu, HI

DEGREE	RELATIVE FIELD	DEGREE	RELATIVE FIELD
0	0.245	180	0.240
10	0.305	190	0.210
20	0.385	200	0.185
30	0.480	210	0.180
40	0.595	220	0.180
45	0.655	225	0.180
50	0.720	230	0.180
60	0.830	240	0.180
70	0.930	250	0.180
80	1.000	260	0.180
90	1.000	270	0.180
100	0.965	280	0.180
110	0.865	290	0.180
120	0.740	300	0.180
130	0.620	310	0.180
135	0.560	315	0.180
140	0.515	320	0.180
150	0.420	330	0.180
160	0.340	340	0.180
170	0.280	350	0.200


FIELD ELEVATION PATTERN
ANT. MFG.: SHIVELY LABS
ANT. TYPE: 6014-14/1-DA
STATION: KPOI
FREQ:97.5 MHz CHAN:248
Power Gain33.528 15.254 dB
DATE: 12/1/99
FIGURE NO.:A00674
1.0
.9
.8
.7
.6
.5
.4
.3
.2
.1
-50
-40
-30
-20
-10
0
10
20
30
40
50
60
70
80


Consulting Engineers
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CARL T. JONES CORPORATION
KHCM-FM.LICENSE (248)
KHCM-STA (248)
358°
55°
Kahuku
Laie
Hauula
Waialua
Wahiawa
Waikane
Waianae
Mililani Town
Ahuimanu
Kailua
Nanakuli
STA
Waipahu
Aiea
Maunawili
Makakilo City
Waimanalo Beach
Ewa Beach
Honolulu
LIC
Kualapuu
Kaunakakai
Lanai Ci
Scale 1:867,047
km
0
10
20
30
Predicted 60 dBu F(50,50) Service Contours
FM Chanel 248C (97.5 MHz)
KHCM-FM License: 80 kW (DA-MAX), 14 m HAAT
KHCM-FM STA from KAIM-FM DA: 17 kW (DA-MAX), 565 m HAAT
Exhibit 1
June, 2019