



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN AMENDMENT TO  
AN APPLICATION FOR CONSTRUCTION PERMIT  
FCC FILE NO. BPH-20040824ABG  
KPDQ-FM - PORTLAND, OREGON  
CHANNEL 230C1, 52.0 kW (max), 387 METERS HAAT  
FACILITY ID NUMBER 58629**

Applicant: Salem Media of Oregon, Inc.

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

This office has been authorized by Salem Media of Oregon, Inc., the licensee of FM broadcast station KPDQ-FM, Portland, Oregon, to prepare this statement and the associated exhibits in support of a minor amendment to the pending KPDQ-FM Application for Construction Permit, FCC File No. BPH-20040824ABG. The pending KPDQ-FM application requests: (1) a channel change as required by the Commission's Report and Order in MB Docket No. 02-136; (2) a one-step upgrade to a Class C1 facility; (3) the reclassification of first-adjacent channel station KXIX(FM), Bend, Oregon, to a Class C0 station; and (4) processing pursuant to Section 73.215 of the FCC Rules. The pending KPDQ-FM application proposes an Effective Radiated Power of 43.0 kW (max) which protects a maximum Class C0 facility at KXIX(FM) in accordance with Section 73.215 of the FCC Rules.

The licensee of KXIX(FM) has now agreed to the station's reclassification to a Class C0 facility. In addition, the licensee of KXIX(FM) has agreed to accept a Section 73.215

authorization at KXIX(FM). A copy of the agreement is contained elsewhere in this Application.

### **CONTINGENT APPLICATION**

In accordance with the agreement reference above, and pursuant to Section 73.3517(e) of the FCC Rules, this amendment is contingently filed with a concurrently filed application for a minor change at KXIX(FM), Bend, Oregon. The proposed administrative change for KXIX(FM) will allow the proposed KPDQ-FM facility to protect KXIX(FM) to its actual service contours rather than maximum Class service contours in accordance with Section 73.215(b)(2)(iii) of the FCC Rules.

### **ONE-STEP APPLICATION**

No change in the KPDQ-FM Channel 230C1 allocation reference site is proposed herein. The KPDQ-FM one-step allocation reference site required by the note contained in Section 73.203 of the FCC Rules remains: 45° 33' 25" N.L. and 122° 50' 42" W.L (NAD-27).

### **CLASS C0 RECLASSIFICATION OF KXIX(FM), BEND, OREGON**

First-adjacent channel station KXIX(FM) is currently licensed to operate as a Class C facility with an ERP of 100.0 KW at an antenna HAAT of 303 meters. Because the current KXIX(FM) antenna HAAT less than 451 meters, KXIX(FM) is subject to

reclassification to a Class C0 facility pursuant to 47 C.F.R. § 73.3573, Note 4. As stated above, the licensee of KXIX(FM) has agreed to the Class C0 reclassification and has requested a Class C0 authorization in the concurrently filed KXIX(FM) Application for Construction Permit.

### **ALLOCATION CONSIDERATIONS**

The proposed KPDQ-FM transmitter site is located 184.84 km from the KXIX(FM) licensed main transmitter site. This separation satisfies the 176 km minimum distance separation specified in Section 73.215(e) for first-adjacent channel related Class C1-to-Class C0 facilities. As shown in Exhibit 1 (Amended May, 2005), prohibited contour overlap will neither be caused nor received to the technical facility proposed in the contingent KXIX(FM) application.<sup>1</sup> Therefore, the instant proposal, as amended, satisfies the provisions of Section 73.215 of the FCC Rules with respect to KXIX(FM).

According to the Commission's engineering database, the proposed KPDQ-FM transmitter site is also 48.16 kilometers short-spacing to the KTIL-FM, Tillamook, OR, (Channel 231C3) licensed transmitter site. The Report and Order, which required KPDQ-FM to file the instant application, changed the KTIL-FM channel of operation from Channel 231C3 to Channel 232C3. The proposed KPDQ-FM transmitter site is fully-spaced to KTIL-FM, Tillamook, OR, (Channel 232C3).

Accordingly, the proposed KPDQ-FM Channel 230C1 transmitter site would satisfy the minimum distance spacing requirements contained in Section 73.207 with respect to

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<sup>1</sup> Note that KXIX(FM) is protected to its actual facilities rather than maximum Class facilities in accordance with Section 73.215(b)(2)(iii) of the FCC Rules. This is because KXIX(FM) filed a contingent application requesting that its license be modified to a "Section 73.215 authorization" and reclassified to a Class C0 facility.

all pertinent assignments, allocations and applications, with the exception of KXIX(FM) (Channel 231C0). As discussed above, Section 72.215 processing is requested with respect to KXIX(FM), Channel 231C0.

### **TECHNICAL FACILITIES**

The applicant proposes to use the existing KPDQ-FM nondirectional transmitting antenna at the antenna height proposed herein. A type-accepted transmitter of adequate power for the required Transmitter Power Output (TPO) will be used.

### **PREDICTED COVERAGE CONTOURS**

The predicted coverage contours were calculated in accordance with the method described in Section 73.313 of the Rules utilizing the appropriate F(50,50) propagation curves from the Rules (Section 73.333, Figure 1), effective radiated power, and antenna height above average terrain as determined for each profile radial. No change in the KPDQ-FM authorized antenna height is proposed herein. The antenna height above average terrain and ground elevation was obtained from data on file with the FCC. The 3.16 mV/m (70 dBu) city-grade contour completely encompasses the principal community to be served, as required by Section 73.315(a) of the Commission's Rules.

### **BLANKETING AND INTERMODULATION INTERFERENCE**

In the event that blanketing interference occurs, the applicant will take appropriate steps to minimize the interference within the blanketing contour. Further, the applicant accepts the responsibility to alleviate any new intermodulation interference, including

receiver induced, resulting from the instant proposal combined with a broadcast facility located within 10 kilometers of the proposed site as required by FCC rules.

In accordance with Commission precedent (See WK LX, Inc., 6 FCC Rcd 225 (1991)), the applicant will exclude both mobile and battery-powered receivers from Receiver Induced Third Order Intermodulation and Blanketing Interference Resolution Requirements. In the event any type of intermodulation interference occurs with any other facilities which have not been identified, the applicant will take appropriate steps (i.e., install and maintain traps or filters) to minimize the interference in fixed receivers. The applicant will respond to complaints of blanketing interference for a period of one year in compliance with Section 73.318(b) of the Commission's Rules.

#### **FAA NOTIFICATION AND TOWER REGISTRATION**

The applicant proposes no change in the authorized height of the KPDQ-FM transmitting antenna or support structure. The FCC tower registration number for the existing support structure is 1033770.

#### **RADIOFREQUENCY IMPACT**

The instant application proposes to reduce the circularly polarized KPDQ-FM ERP from 100 kW to 52 kW. Consequently, the multiple-use transmitter site will remain compliant with FCC guidelines because the KPDQ-FM power density contribution will decrease by 48% as a result of the instant proposal.

### **OCCUPATIONAL SAFETY**

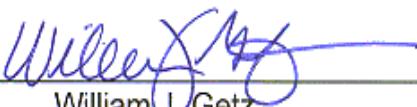
Radio station KPDQ-FM will continue to cooperate/coordinate with other site users and reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

In light of the above, the proposed KPDQ-FM facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

### **SUMMARY**

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Section III-B, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: May 20, 2005

  
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William J. Getz