



**DELAWDER COMMUNICATIONS, INC.**

2121 Eisenhower Avenue, Suite 200

Alexandria, Virginia 22314

(703) 299-9222

**ENGINEERING REPORT**

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**Willow Creek, CA, FM Minor Modification for New Station--Amendment**

issue an order to Show Cause why KJNY should not be ordered onto channel 249C1. (KJNY is the first of two involuntary changes required of this set of contingent applications.)

Table 3 (added by this amendment), attached, is a channel 259C2 separation study that demonstrates compliance with Section 73.207 for KPOD-FM, Crescent City, CA. (The channel 250C2 reserved assignment reference coordinates are used as the study reference coordinates, and can also be used as the reference coordinates for the proposed channel 259C2 facility.) The Applicant respectfully asks the Commission to issue an order to Show Cause why KPOD-FM should not be ordered onto channel 259C2. (KPOD-FM is the second of two involuntary changes required of this set of contingent applications.)

It should be noted that KPOD-FM can continue to operate with its licensed class A facility from its licensed transmitter site on the new channel 259 (in conformance with the Section 73.207 separation requirements) if it so desires. (Of course, should KPOD-FM indicate that it is no longer interested in the class C2 reserved assignment and wishes to remain as a class A licensed facility, it can do so without the channel change and remain on channel 250A.) Furthermore, various other channels (260, 264 and 283) appear to also be available to KPOD-FM as an alternative for the class C2 assignment.

**Delawder Communications, Inc.  
Alexandria, VA**

**TABLE 1, Page 1 of 1**  
Wednesday, April 04, 2007

BIAfn/Dataworld FM Spacing Study

**Title: Willow Creek 254C3**

Channel: 254 C3 (98.7 MHz)  
Database: FCC 4/4/2007 12:00:00 AM

Latitude: N 40° 52' 28.0"  
Longitude: W 123° 43' 52.0"  
Safety Zone: 45.0 km

Call City of License	Auth	Licensee name St FCC File Number	Chan Freq	HAAT(m) HAMS(L)m	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)	
KMUE	APP	REDWOOD COMMUNITY RADIO, INC CA BPED-20070403ABK	*201 C1 88.1	494.0 882.0	15 V	N 40° 43' 39.0" W 123° 58' 17.0"	231.1 51.0	26.03 2.028	24.00 CLOSE	
DA: ODD FORM 340 @ 0.0°										
KVIP-FM REDDING	USE	PACIFIC CASCADE COMMUNICATIONS C CA	251 C 98.1			N 40° 39' 18.0" W 122° 31' 21.0"	103.1 283.9	104.9 8.919	96.00 CLOSE	
Coordinates updated from LIC record BLH840518D										
KVIP-FM REDDING	LIC	PACIFIC CASCADE COMMUNICATIONS C CA BMLED-19971006KC	251 C 98.1	521.0 1045.0	30 H 30 V	N 40° 39' 18.0" W 122° 31' 21.0"	103.1 283.9	104.9 8.919	96.00 CLOSE	
890505MA HARBECK-FRUITDALE	USE	E. LARA SHAINIS OR	252 C2 98.3			N 42° 22' 56.0" W 123° 16' 29.0"	12.6 192.9	171.7 115.7	56.00 CLEAR	
City as show										
NEW WILLOW CREEK	APP	MIRIAM MEDIA, INC. CA BSFH-20061218ADR	253 A 98.5			N 40° 56' 50.0" W 123° 37' 10.0"	49.2 229.3	12.40	89.00	
NOTE: Short Form for this proposal										
	VAC		253 A 98.5			N 40° 56' 50.0" W 123° 37' 10.0"	49.2 229.3	12.40	89.00	
WILLOW CREEK CA RM-10020 NOTE: Allotment for this upgrade proposal										
KSAY FT. BRAGG	LIC	AXELL BROADCASTING CA BLH-19960507KB	253 B1 98.5	138.0 241.0	3.5 H 3.5 V	N 39° 28' 03.0" W 123° 45' 34.0"	180.9 0.9	156.2 42.24	114.0 CLEAR	
KSAY FT. BRAGG	USE	AXELL BROADCASTING CA	253 B1 98.5			N 39° 28' 03.0" W 123° 45' 34.0"	180.9 0.9	156.2 42.24	114.0 CLEAR	
KSXY MIDDLETOWN	LIC	COMMONWEALTH BROADCASTING, LLC CA BLH-20020529ABJ	254 A 98.7	572.0 1205.0	0.165 H 0.165 V	N 38° 47' 16.0" W 122° 44' 50.0"	159.8 340.4	246.5 104.5	142.0 CLEAR	
KRVC HORN BROOK	CP	OPUS BROADCASTING SYSTEMS, INC. CA BMPH-20061127AAK	255 C2 98.9	757.0 2045.0	1.25 H 1.25 V	N 42° 05' 00.0" W 122° 42' 00.0"	32.2 212.9	159.5 42.51	117.0 CLEAR	
KJNY FERNDAL	LIC	REDWOOD BROADCASTING COMPANY CA BLH-19961202KB	256 C1 99.1	523.0 744.0	6 H 6 V	N 40° 30' 03.0" W 124° 17' 08.0"	228.6 48.2	62.59 -13.4	76.00 SHORT	
NOTE: Contingent filing proposed for involuntary "show cause" of KJNY to ch 249C1; See Table 2 for Section 73.207 Study for KJNY 249C1										
KNNN SHASTA LAKE CITY	LIC	MAPLETON COMMUNICATIONS, LLC CA BLH-20010605AAC	257 C2 99.3	465.0 996.0	1.6 H 1.6 V	N 40° 39' 15.0" W 122° 31' 12.0"	103.1 283.9	105.1 49.15	56.00 CLEAR	

>> End of channel 254 C3 study <<

**Delawder Communications, Inc.  
Alexandria, VA**

**TABLE 2, Page 1 of 1**  
Wednesday, April 04, 2007

BIAfn/Dataworld FM Spacing Study

**Title: Ferndale CA 249C1**

Channel: 249 C1 (97.7 MHz)  
Database: FCC 4/4/2007 12:00:00 AM

Latitude: N 40° 30' 03.0"  
Longitude: W 124° 17' 08.0"  
Safety Zone: 50.0 km

Call City of License	Auth	Licensee name St	FCC File Number	Chan Freq	HAAT(m) HAMSL(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
KNCQ REDDING	USE	RESULTS RADIO OF REDDING LICENSE CA		247 C 97.3			N 40° 36' 10.0" W 122° 38' 58.0"	84.8 265.8	139.0 34.05	105.0 CLEAR
Coordinates updated from LIC record BLH851104K										
KNCQ REDDING	LIC	RESULTS RADIO OF REDDING LICENSE CA	BLH-19851104KF	247 C 97.3	1088.0 1913.0	28 H 28 V	N 40° 36' 10.0" W 122° 38' 58.0"	84.8 265.8	139.0 34.05	105.0 CLEAR
KABX-FM MERCED	USE	MAPLETON COMMUNICATIONS, LLC CA		248 B 97.5			N 37° 22' 31.0" W 120° 27' 37.0"	135.2 317.6	480.0 285.0	195.0 CLEAR
Coordinates updated from LIC record BLH787										
KVRV MONTE RIO	LIC	MAVERICK MEDIA OF SANTA ROSA LIC CA	BLH-19920226KB	249 B1 97.7	342.0 513.0	2.05 H 2.05 V	N 38° 32' 25.0" W 122° 57' 40.0"	152.1 332.9	245.7 12.66	233.0 CLOSE
KRAT ALTAMONT	APP	GEORGE J. WADE OR	BMPH-19990429IA	249 C1 97.7	522.0 1931.0	22 H 22 V	N 42° 10' 06.0" W 122° 09' 10.0"	43.1 224.6	257.2 12.24	245.0 CLOSE
KRAT ALTAMONT	APP	GEORGE J. WADE OR	BMPH-19990429IA	249 C1 97.7	522.0 1931.0	21.8 H 21.8 V	N 42° 10' 06.0" W 122° 09' 06.0"	43.2 224.6	257.3 12.30	245.0 CLOSE
KHHZ GRIDLEY	RSV	DEER CREEK BROADCASTING, LLC CA		249 B1 97.7			N 39° 34' 13.0" W 121° 25' 22.0"	112.1 293.9	265.3 32.29	233.0 CLEAR
KHHZ OROVILLE	LIC	DEER CREEK BROADCASTING, LLC CA	BLH-19970501KD	249 B1 97.7	389.0 1003.0	1.5 H 1.5 V	N 39° 30' 18.0" W 121° 18' 35.0"	112.6 294.6	277.1 44.13	233.0 CLEAR
From channel 249A per D88-19										
KHHZ GRIDLEY	APP	DEER CREEK BROADCASTING, LLC CA	BPH-20070126ADB	249 B1 97.7	389.0 1003.0	1.5 H 1.5 V	N 39° 30' 18.0" W 121° 18' 35.0"	112.6 294.6	277.1 44.13	233.0 CLEAR
KPOD-FM CRESCENT CITY	LIC	KPOD, LLC CA	BMLH-20010702AAP	250 A 97.9	-39.0 93.0	6 H 6 V	N 41° 45' 35.0" W 124° 11' 28.0"	3.2 183.3	140.0 7.030	133.0 CLOSE
KVIP-FM REDDING	LIC	PACIFIC CASCADE COMMUNICATIONS C CA	BMLED-19971006KC	251 C 98.1	521.0 1045.0	30 H 30 V	N 40° 39' 18.0" W 122° 31' 21.0"	82.9 264.0	150.3 45.26	105.0 CLEAR
KXBX-FM LAKEPORT	LIC	BICOASTAL MEDIA, LLC CA	BLH-20010207AAH	252 A 98.3	112.0 713.0	4.8 H 4.8 V	N 39° 02' 56.0" W 122° 46' 03.0"	140.7 321.7	207.1 132.1	75.00 CLEAR

>> End of channel 249 C1 study <<

**Delawder Communications, Inc.  
Alexandria, VA**

**TABLE 3, Page 1 of 1**  
Wednesday, August 20, 2008

BIAfn/Dataworld FM Spacing Study

**Title: KPOD-FM Crescent City, CA for Channel 259C2**

Channel: 259 C2 (99.7 MHz)  
Database: FCC 8/20/2008 12:00:00 AM

Latitude: N 41° 48' 25.0"  
Longitude: W 124° 10' 16.0"  
Safety Zone: 65.0 km

Call City of License	Auth	Licensee name St FCC File Number	Chan Freq	HAAT(m) HAMS(L)(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
KKLJ	LIC	EDUCATIONAL MEDIA FOUNDATION	*205 A	666.0	0.11 H	N 42° 04' 05.0"	80.2	184.8	15.00
KLAMATH FALLS		OR BLED-20080509ADE	88.9	2017.0	0.11 V	W 121° 58' 13.0"	261.7	169.8	CLEAR
DA: ODD FORM 340 @ 0.0°									
KSMF	LIC	OREGON ST BOARD OF HIGHER ED FOR	*206 C2	412.0	2.3 H	N 42° 17' 54.0"	64.6	129.7	20.00
ASHLAND		OR BLED-19920511KA	89.1	1172.0	2.3 V	W 122° 44' 59.0"	245.5	109.7	CLEAR
KJNY	USE	REDWOOD BROADCASTING COMPANY	256 C1			N 40° 34' 42.0"	183.1	136.6	79.00
FERNDAL		CA	99.1			W 124° 15' 36.0"	3.1	57.65	CLEAR
KNNN	LIC	MAPLETON LICENSE OF REDDING, LLC	257 C2	465.0	1.6 H	N 40° 39' 15.0"	132.3	188.6	58.00
SHASTA LAKE CITY		CA BLH-20010605AAC	99.3	996.0	1.6 V	W 122° 31' 12.0"	313.4	130.6	CLEAR
KAGO-FM	USE	NEW NORTHWEST BROADCASTERS, LLC	258 C1			N 42° 12' 56.0"	76.2	201.7	158.0
KLAMATH FALLS		OR	99.5			W 121° 47' 56.0"	257.7	43.68	CLEAR
KAGO-FM	LIC	NEW NORTHWEST BROADCASTERS, LLC	258 C1	112.0	60 H	N 42° 12' 56.0"	76.2	201.8	158.0
KLAMATH FALLS		OR BLH-20050902ABI	99.5	1439.0	60 V	W 121° 47' 51.0"	257.8	43.80	CLEAR
KTOR	USE	SIERRA RADIO, INC.	259 A			N 40° 20' 00.0"	122.9	294.8	166.0
CHESTER		CA	99.7			W 121° 15' 13.0"	304.8	128.8	CLEAR
KZRO	LIC	BIG TREE COMMUNICATIONS	261 C3	71.0	12.5 H	N 41° 17' 30.0"	109.0	171.0	56.00
DUNSMUIR		CA BLH-20001002AGI	100.1	1514.0	12.5 V	W 122° 14' 21.0"	290.3	115.0	CLEAR
KRWQ	USE	BICOASTAL MEDIA LICENSES VI, LLC	262 C1			N 42° 27' 07.0"	51.7	116.8	79.00
GOLD HILL		OR	100.3			W 123° 03' 20.0"	232.4	37.79	CLEAR
Coordinates updated from LIC record BLH800903A									
KRWQ	LIC	BICOASTAL MEDIA LICENSES VI, LLC	262 C1	306.0	30 H	N 42° 27' 11.0"	51.6	116.8	79.00
GOLD HILL		OR BLH-20070614AAN	100.3	860.0	30 V	W 123° 03' 22.0"	232.4	37.83	CLEAR

>> End of channel 259 C2 study <<

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12<sup>th</sup> STREET SW**  
**WASHINGTON DC 20554**

**JUL 31 2008**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
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Miriam Media, Inc.  
6117 Lemon Thyme Drive  
Alexandria, VA 22310

In re: NEW(FM), Willow Creek, CA  
Facility ID #170982  
Miriam Media, Inc. ("Miriam")  
BPH-20070406ABY

Dear Applicant:

This letter is in reference to: (1) the above-captioned FM Auction No. 70 application for a new commercial facility, as amended April 27, 2007, to serve Willow Creek, CA and to upgrade from Channel 253A to Channel 254C3; (2) the May 17, 2007 Petition to Deny filed by Redwood Broadcasting, Inc. ("Redwood"); and (3) all other related pleadings. Miriam's application requested the substitution of Channel 249C1 for Channel 256C1 at Ferndale, CA and modification of the FM Station KJNY license.

An engineering study of KJNY's licensed facility on Channel 249C1 reveals that it fails to comply with the spacing requirements of 47 C.F.R. § 73.207 with respect to the first-adjacent channel 250C2 reserved assignment for KPOD-FM, Crescent North, CA.<sup>1</sup> The required spacing pursuant to § 73.207 is 158 kilometers while the actual spacing is 145 kilometers. Therefore, Channel 249C1 cannot be substituted for Channel 256C1 for KJNY. Accordingly, the application must be amended.

Further action on the subject application will be withheld for a period of thirty days from the date of this letter to provide the applicant an opportunity to respond. Failure to respond within this time period will result in the dismissal of the application pursuant to 47 C.F.R. § 73.3568(a). Please note that any amendment must be submitted in the same manner as the original application. This letter does not imply any judgment on the May 17, 2007 Petition to Deny filed by Redwood.

Sincerely,



Rodolfo F. Bonacci  
Assistant Chief  
Audio Division  
Media Bureau

cc: David Tillotson, Esq.  
Evan D. Carb, Esq.

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<sup>1</sup> See *Report and Order*, MM Docket No. 93-31, released July 30, 1993. Station KPOD-FM's license was modified to specify operations on Channel 250C2.