

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 KKRO, Redding, California. 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 facilities:

Facility ID	Status	Call Sign (or File #)	City of License	Exhibit
10905	App	BPED-19950327MA	Redding, CA	15B-1
77085	App	BPED-19950713MB	Redding, CA	15B-2

Again, this proposal will not cause interference to the above applications as KKRO's proposed interfering 100 dBu contour will not overlap the applications' protected 60 dBu contour. KKRO's proposed protected contour would, however, receive prohibited overlap from the applications listed above. The area of "overlap received" from the above referenced facilities will be approximately:

Call Sign (or File #)	Square kM	Total area of KKRO's proposed 60 dBu
BPED-19941026MA	13.90	0.31%
BPED-19950714MD	10.64	0.23%

The grant of this waiver request will allow KKRO to increase its overall coverage area by 2525.9 square kilometers, an increase of 125.82%. It will provide new service to an estimated 100,275 persons, an increase of 1236.28%. 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 KKRO, 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.



Exhibit 15B-1

KKRO.P

BLED20021119ABO
Latitude: 40-36-10 N
Longitude: 122-38-58 W
ERP: 0.30 kW
Channel: 218
Frequency: 91.5 MHz
AMSL Height: 1907.0 m
Elevation: 1878.0 m
Pattern: Directional

950327MA

BPED19950327MA
Latitude: 40-39-14 N
Longitude: 122-31-12 W
ERP: 1.80 kW
Channel: 216
Frequency: 91.1 MHz
AMSL Height: 978.0 m
Elevation: 969.0 m
Horiz. Pattern: Directional

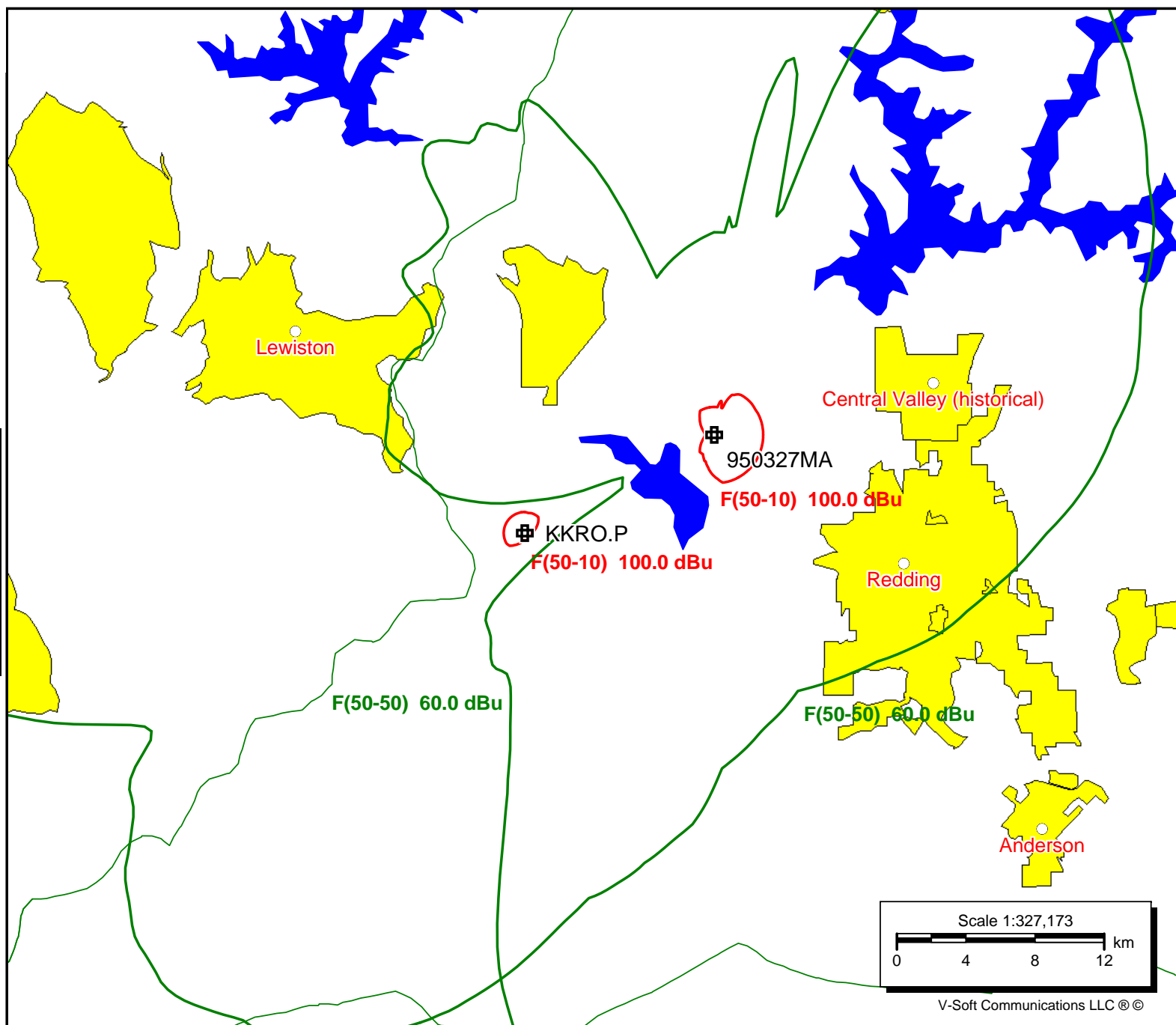




Exhibit 15B-2

KKRO.P

BLED20021119ABO
Latitude: 40-36-10 N
Longitude: 122-38-58 W
ERP: 0.30 kW
Channel: 218
Frequency: 91.5 MHz
AMSL Height: 1907.0 m
Elevation: 1878.0 m
Pattern: Directional

950713MB

BPED19950713MB
Latitude: 40-39-14 N
Longitude: 122-31-12 W
ERP: 1.80 kW
Channel: 216
Frequency: 91.1 MHz
AMSL Height: 986.0 m
Elevation: 968.0 m
Horiz. Pattern: Directional
Vert. Pattern: No

