

**Section 74.1204 - Statement of Compliance
Minor Modification of Construction Permit
FCC File No. BMPFT-20170209AAN
K236CR-CP, Honolulu, HI, Channel 236
FM Translator Facility ID. 142637
May, 2017**

The Applicant proposes a minor modification to the above-referenced, non-reserved band, FM translator Construction Permit. Specifically, the applicant proposed herein to relocate and increase power and antenna height. No further changes are proposed herein. 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 is a map which demonstrates 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) 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

The required protection to second-adjacent channel stations KAIM-FM, Honolulu, HI (Channel 238C) and KUMU-FM, Honolulu, HI (Channel 234C1) 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 the second-adjacent channel, full service stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, as demonstrated below, the instant proposal will cause no interference to any population served by either station.

At the translator's proposed transmitter site, both full-service stations are predicted to produce an F(50,50) signal strength of 89 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 129 dBu contour relative to both stations. According to free space calculations, the translator's worst-case predicted 129 dBu contour will extend, at most, 39 meters from the proposed antenna. As shown on Exhibit 2, the proposed antenna will be located on a tower in remote mountaintop location and the worst-case predicted area of interference will not reach any people or occur over any major roadways. Therefore, the proposed

minor change will cause no interference to any population served by either KAIM-FM or by KUMU-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

Exhibit 1

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Key to Stations on Map

- K236CR.CP.MOD.236.FAC.ID.142637
- KAOI-FM.236C1.FAC.ID.70375

K236CR.CP.MOD.236.FAC.ID.142637
 Honolulu, HI
 Latitude: 21-20-09 N
 Longitude: 157-49-04 W
 ERP: 0.25 kW
 Channel: 236
 Frequency: 95.1 MHz
 AMSL Height: 641.0 m
 Horiz. Pattern: Omni

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):
 40 dBu F(50,10) to Class A & FX & LPFM
 40 dBu F(50,10) to Class C, C0, C1, C2, C3
 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, C, Cx, 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)



