

The applicant is presently authorized to operate out-of-core TL K52FK, Eureka, California, at a location slightly south of Ferndale, California, and approximately 35 kilometers from Eureka. It is now proposed to relocate the facility to a site much nearer its city of license, at the same time changing to Channel 20z.

Although the distance of the relocation would be 37.3 kilometers, the provisions of 47 CFR 73.3572(a)(4)(ii) do not specify any distance limitations for these DTV/out-of-core displacements. And as shown in attached Exhibit 6A, the authorized service contour is wholly contained within the proposed.

The relocation site is at Kneeland Ridge, near Eureka, which was chosen for the fact that it is small antenna farm with existing tower(s) and suitable buildings. Humboldt County, of which Eureka is the county seat, is a rural and heavily forested area featuring groves of giant redwoods. It appears to be county policy to look with disfavor on use permit applications for new tower/station construction and these environmental concerns prompted the applicant to seek a previously developed site. There are very few of these in the area and Kneeland Ridge appears to be the closest.