

LANCASTER EDUCATIONAL BROADCAST SERVICE
KLQS-LP 97.5 FM AGUA DULCE, CALIF
FAC ID NO. 195731

AMENDMENT TO MINOR CHANGE OF LICENSED FACILITY

Channel	248L1
New Location:	34° 22' 22.1" N 118° 24' 59.7" W-- NAD 83 34° 22' 22.1" N 118° 24' 56.4" W -- NAD 27
Antenna AGL	10 m
Tower Total	10 m
Antenna Ground	597 m
Antenna COR	607 m
HAAT	12.9 m
Power	0.1 kW

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Lancaster Educational Broadcast Service
REFERENCE                                     DISPLAY DATES
34 22 22.1 N.                               CLASS = L1 Int =      DATA 08-12-19
118 24 56.4 W.                             Current Spacings to 2nd Adj. SEARCH 08-12-19
----- Channel 248 - 97.5 MHz -----

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Call	Channel	Location		Azi	Dist	FCC	Margin
*KLAX-FM	LIC-Z 250B	East Los Angeles	CA	138.9	30.81	66.5	-35.7
*KAMP-FM	LIC-D 246B	Los Angeles	CA	116.7	36.01	66.5	-30.5
KLQS-LP	APP 248L1	Agua Dulce	CA	21.1	11.73	23.5	-11.8
KLQS-LP	APP 248L1	Agua Dulce	CA	328.5	12.84	23.5	-10.7
KLQS-LP	LIC 248L1	Agua Dulce	CA	35.6	16.39	23.5	-7.1
KHUG-LP	LIC 248L1	Castaic	CA	304.4	24.66	23.5	1.2
KLYY	LIC-D 248B	Riverside	CA	97.1	118.43	111.5	6.9
KTPI-FM	LIC 249A	Mojave	CA	18.6	71.01	55.5	15.5
KLSB	LIC 248B	Goleta	CA	277.3	142.72	111.5	31.2
KRJK	LIC 247A	Lamont	CA	343.2	95.17	55.5	39.7
NEW	CP 248L1	San Pedro	CA	174.0	69.72	23.5	46.2

Reference station has protected zone issue: Mexico
All separation margins include rounding

* See second adjacent waiver

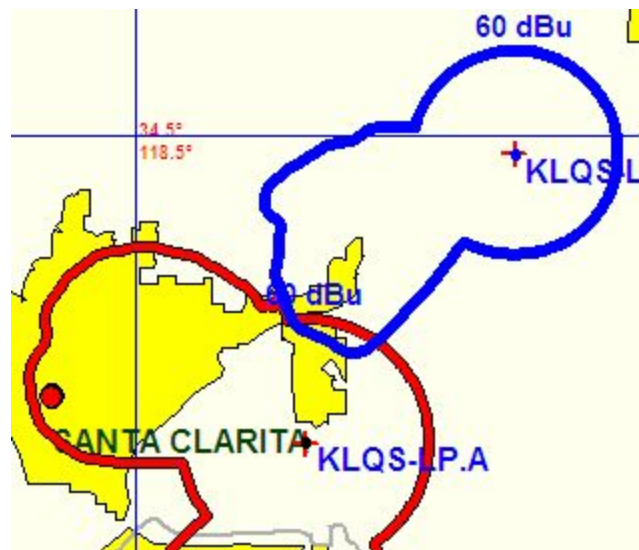
Minor Change Waiver Request

Application requests waiver of Section 73.870(a). Waiver is requested in the public interest for good reason: the station cannot serve its community and would need to go dark otherwise because it is difficult to comply with engineering requirements and topography barriers within the area. The facility is unable to cover the community adequately for a number of proposals considered by KLQS-LP. Proposals at the edge of the Los Angeles metro in the area of the Santa Clarita Valley face untenable limitations concerning limited channel-to-channel (Section 73.807) spacing (see chart above), and second adjacent channel zero-population overlap areas (the further from the radio market center, second adjacent overlap areas balloon to large areas). Both are applicable to the applicant (in addition to an airport, which limits proposed tower heights) -- the latter especially. In the area KLQS-LP desires to serve, second adjacent channel, KAMP's, signal strength is 59.3 dBu (protection to 54 dBu), which equates to an interference area bounded by a 99.3 dBu contour area. This equates roughly to a 760 meter interference radius. There applicant cannot find a zero-population area of 1.5 km in diameter. Additionally, the entire topography of the proposed coverage area is comprised of canyons (hence the community's appropriate name of "Canyon Country"). This topography blocks the signal propagation. Applicant proposes moving 16.9 km south -- the furthest south it can relocate to and still cover its target community. The reasoning for this is this collapses the second-adjacent interference to a mere 200 meter zero-population radius, which a site can be

found for. The area has sufficient elevation to cover the target community of broadcast choice too.

It is noted:

- Several Section 73.870(a) waivers have been granted in the past (for facilities WUMO-LP, KXWS-LP, KHUG-LP, KLQS-LP, KOWO-LP, KINC-LP, WAON-LP, KVBE-LP, WCRM-LP, WTJN-LP, KUTZ-LP, WJPP-LP, KCZP-LP, KSKQ-LP, KWQA-LP, KCGV-LP, KTQA-LP). The reasoning presented here is more substantive than half these requests.
- MB Docket No. 19-193, currently pending, proposes changing the LPFM site relocation rules (Section 73.870) to allow “site relocations that involve overlap between the 60 dBu service contours of the currently authorized and proposed facilities”. This proposal complies with this proposed rule (see below):



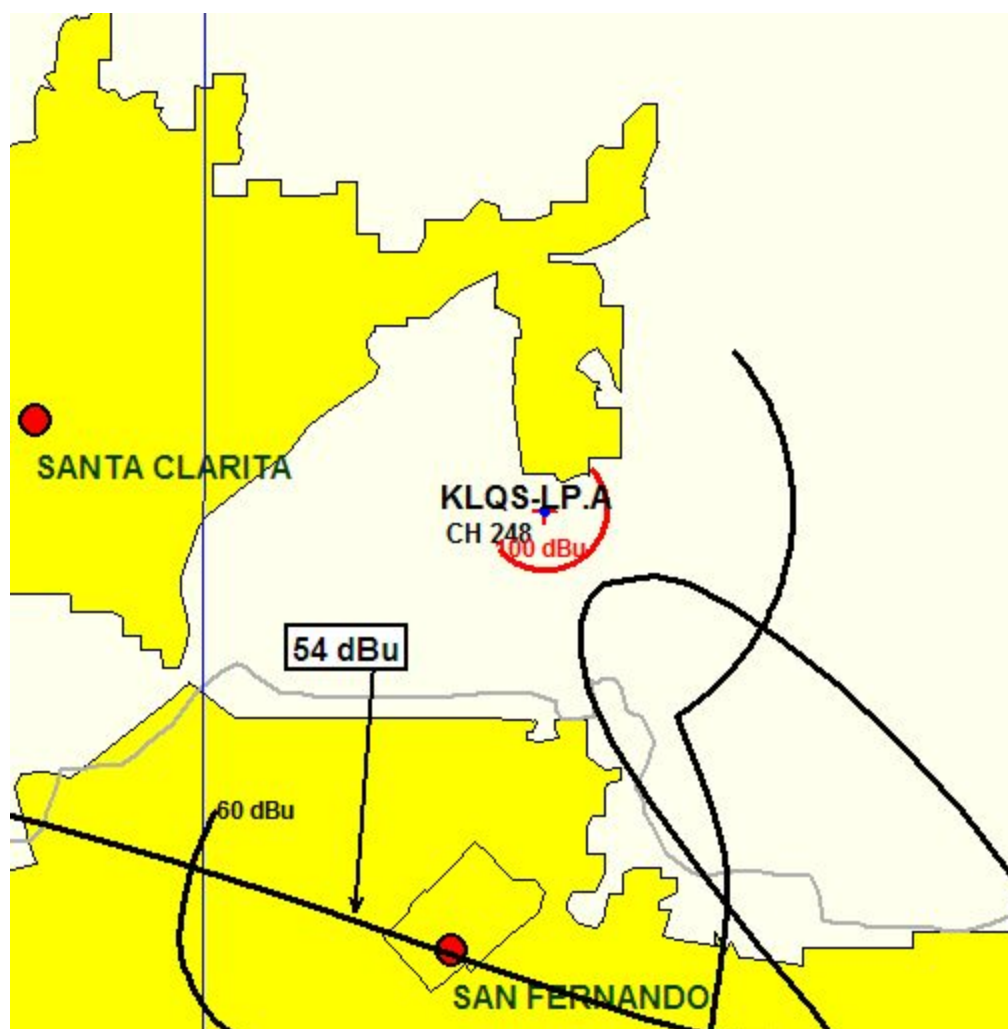
- LPFM minor change request BPL-20170718AGM -- currently pending -- has proposed the same type of relocation, and has not been denied. If needed, applicant is willing to wait until Commission finds it tenable to process this application, like that application.

TOWAIR (PASS)

DETERMINATION Results	
Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.	
Your Specifications	
NAD83 Coordinates	
Latitude	34-22-22.1 north
Longitude	118-24-59.7 west
Measurements (Meters)	
Overall Structure Height (AGL)	10
Support Structure Height (AGL)	0
Site Elevation (AMSL)	597
Structure Type	

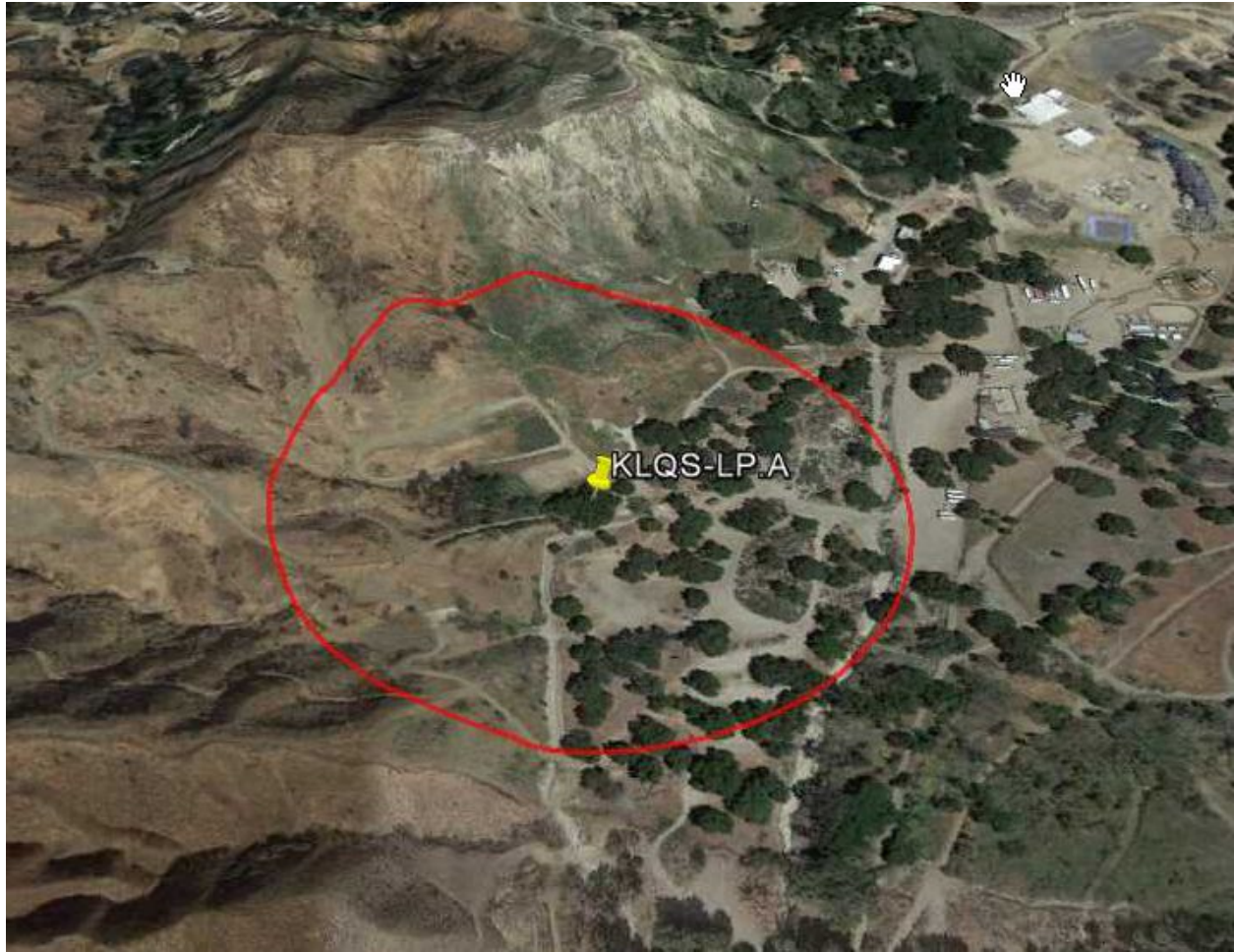
Second Adjacent Waiver Request

First, the proposed resides outside of second adjacent channel KLAX-FM's 54 dBu contour (below), even though it is short-spaced. Thus, the KLAX-FM 54 dBu is protected from interference.



As for the other second adjacent KAMP-FM, the applicant respectfully requests a "second adjacent channel waiver" with regards to Section 47 C.F.R. Section 73.807 of the FCC rules based upon the "Living Way" precedence (Living Way Ministries, Inc., Memorandum Opinion and Order, 17 FCC Red 17054, 17056, ¶ 5 (2002), recon. denied 23 FCC Red 15070 (2008)).

Using U/D methodology, at the proposed KLQS-LP transmitter location second adjacent channel KAMP-FM has a signal strength of 70.1 dBu. Interference will occur when the KAMP signal strength's interfering signal exceeds the desired signal by 40 dbu. So the area of predicted interference would then be bounded by the 110.8 dBu contour.



The red line delineates the interference area. This contour was generated via V-Soft FM Commander software and outputted to a Google Earth kml file. No population exists within the interference.

Thus, the applicant requests second adjacent waiver based upon evidence no interference is proposed.