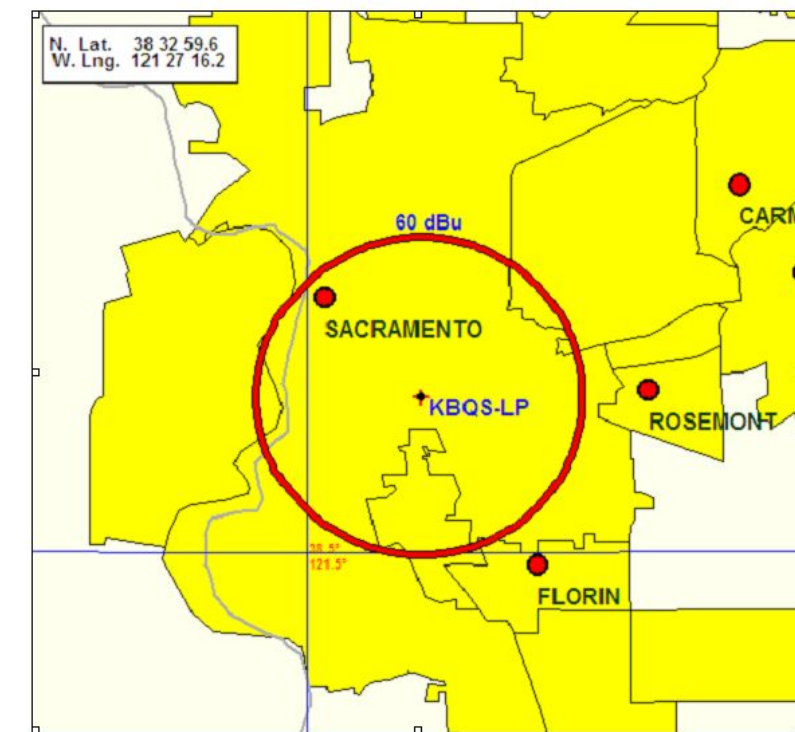


**SACRAMENTO BIKE KITCHEN (“SBK”)**  
**MINOR CHANGE OF LICENSED FACILITIES LOW POWER FM**  
**KBQS-LP SACRAMENTO, CA FAC ID # 197555**

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**Parameters**

Coordinates: NAD 83 38 32 59.3 N 121 27 20.0 W  
NAD 27 38 32 59.6 N 121 27 16.2 W  
Site 12 m  
AGL 20 m  
Tower 25.6 m  
ERP 100 watt  
Frequency 107.5 FM  
ASRN: 1264125



Sacramento Bicycle Kitchen

REFERENCE		DISPLAY DATES
38 32 59.6 N.	CLASS = L1	DATA 12-29-17
121 27 16.2 W.	Current Spacings to 2nd Adj.	SEARCH 01-15-18
----- Channel 298 - 107.5 MHz -----		

Call	Channel	Location	Azi	Dist	FCC	Margin
*DKDND	LIC 300B	Sacramento	CA 352.5	17.99	66.5	-48.5
KQPT	LIC 298B	Colusa	CA 317.4	111.94	111.5	0.44
KLVS	LIC-N 297B	Livermore	CA 213.2	97.29	96.5	0.8
NEW	CP 298A	Sutter Creek	CA 99.5	79.44	66.5	12.9
NEW	CP 298A	Sutter Creek	CA 99.5	79.44	66.5	12.9
K296GB	LIC 296D	North Highlands	CA 44.6	29.67	13.5	16.2
KQPT	CP -Z 298B	Colusa	CA 354.0	140.34	111.5	28.8
KSAN	LIC 299B	San Mateo	CA 222.2	128.57	96.5	32.1

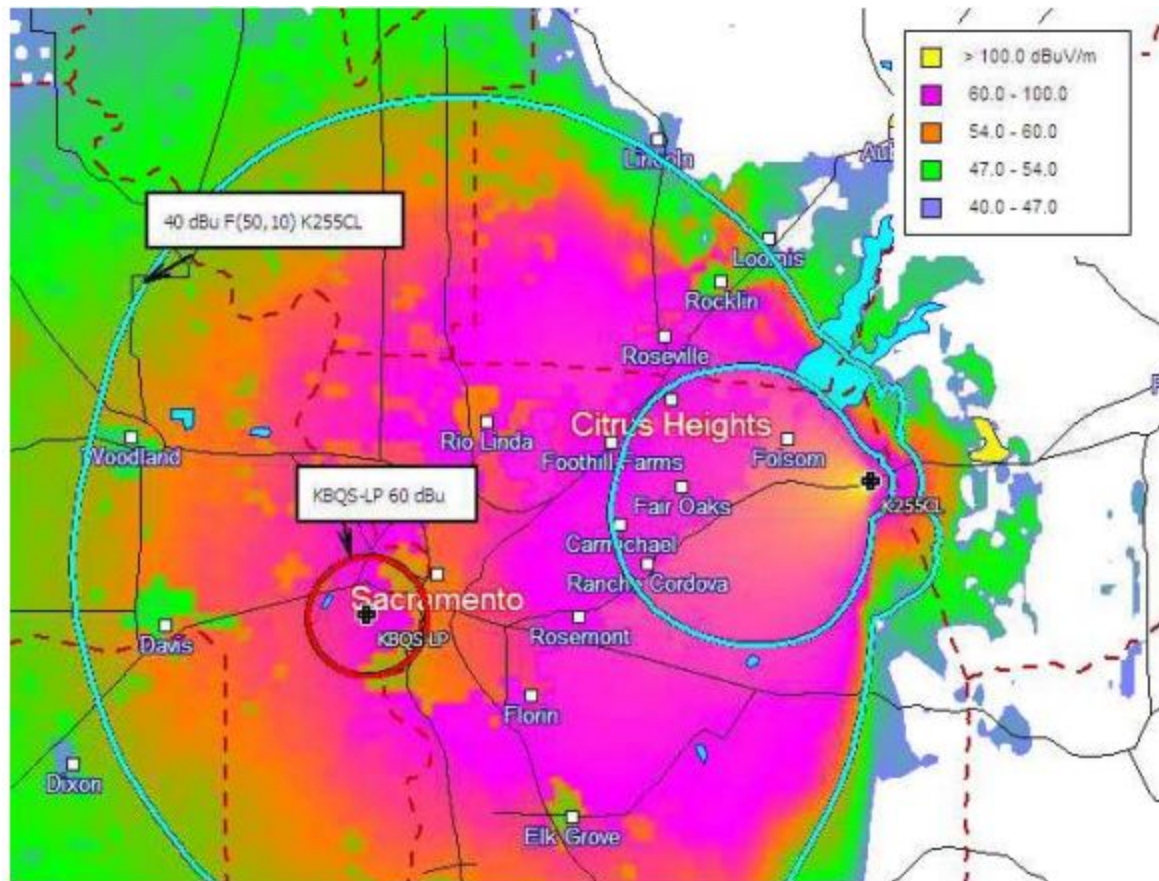
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All separation margins include rounding  
 \* Deleted.

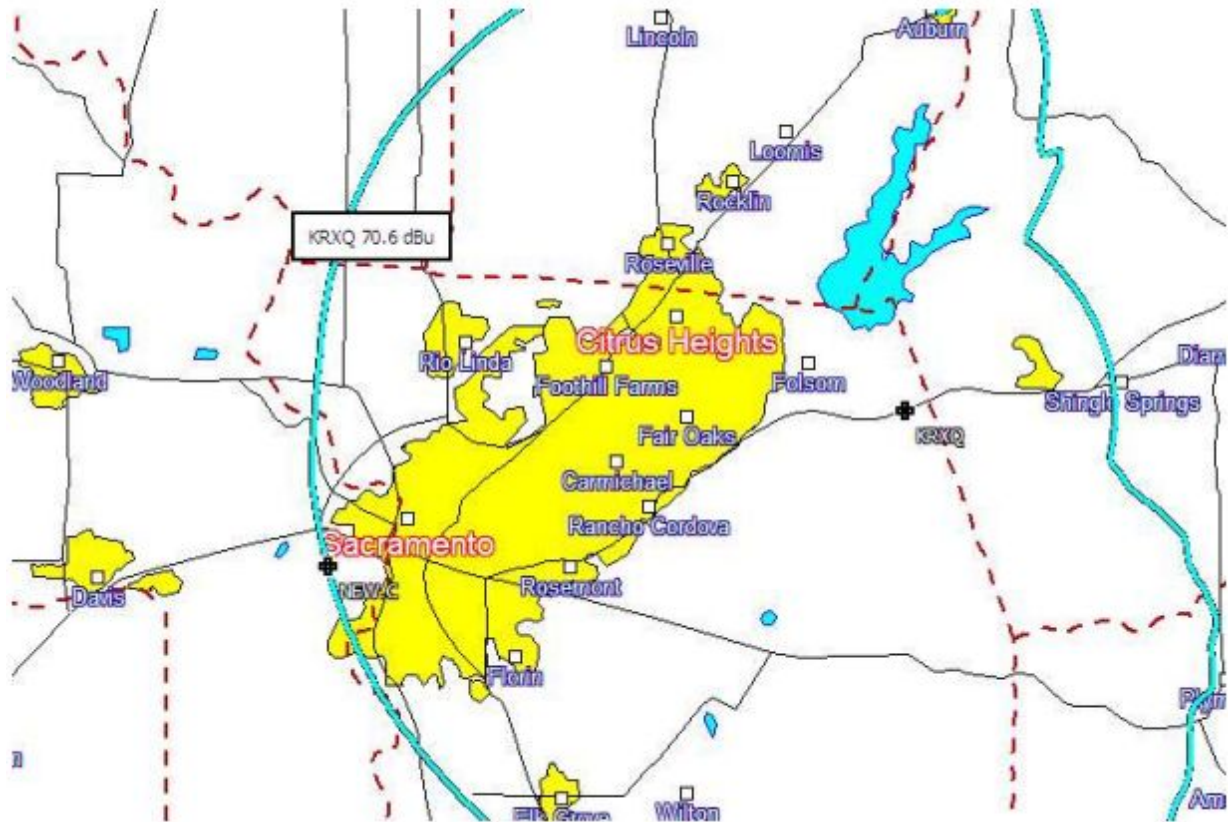
## Channel Change Pursuant to 73.870(a)(1)

The FCC permits LPFM facilities to change channels upon technical showing of reduced interference ("Changes in frequency to adjacent or IF frequencies or, upon a technical showing of reduced interference, to any frequency").

- (1) KBQS-LP is well within the area of interference from co-channel fill-in translator K255CL. The Longey Rice propagation of the translator demonstrates a 60 dBu signal strength within KBQS-LP's 60 dBu FCC contour.



- (2) KBQS-LP has a 207 m radius second adjacent overlap interference area within the KRXQ (FM) protected contour which makes it very difficult to locate anywhere (zero population is required within that overlap).



Proposal: Moving to 107.5 FM would eliminate the aforementioned interference issues. The proposed channel is **full-spaced** to all full powers and translators (there are no fill-in translators on co-channels), and has no second adjacent overlap. This offers an opportunity for reduced interference. The Commission continually maintains that the spacing prescribed within §73.807 “were designed to provide the same degree of interference protection that full-service stations provide each other.”<sup>1</sup>

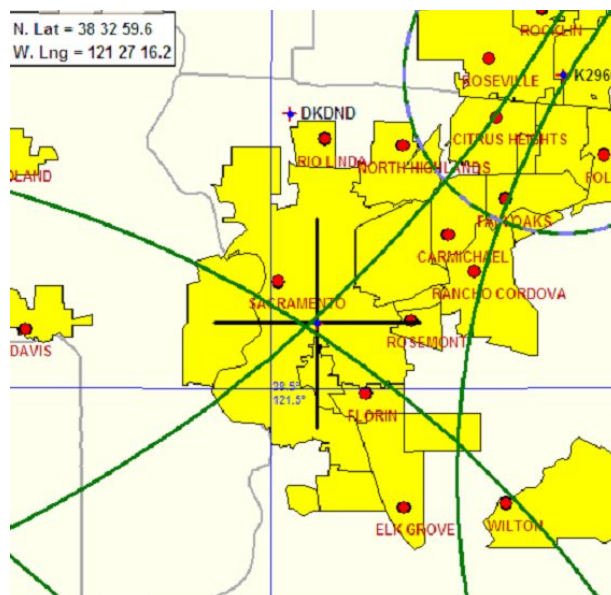
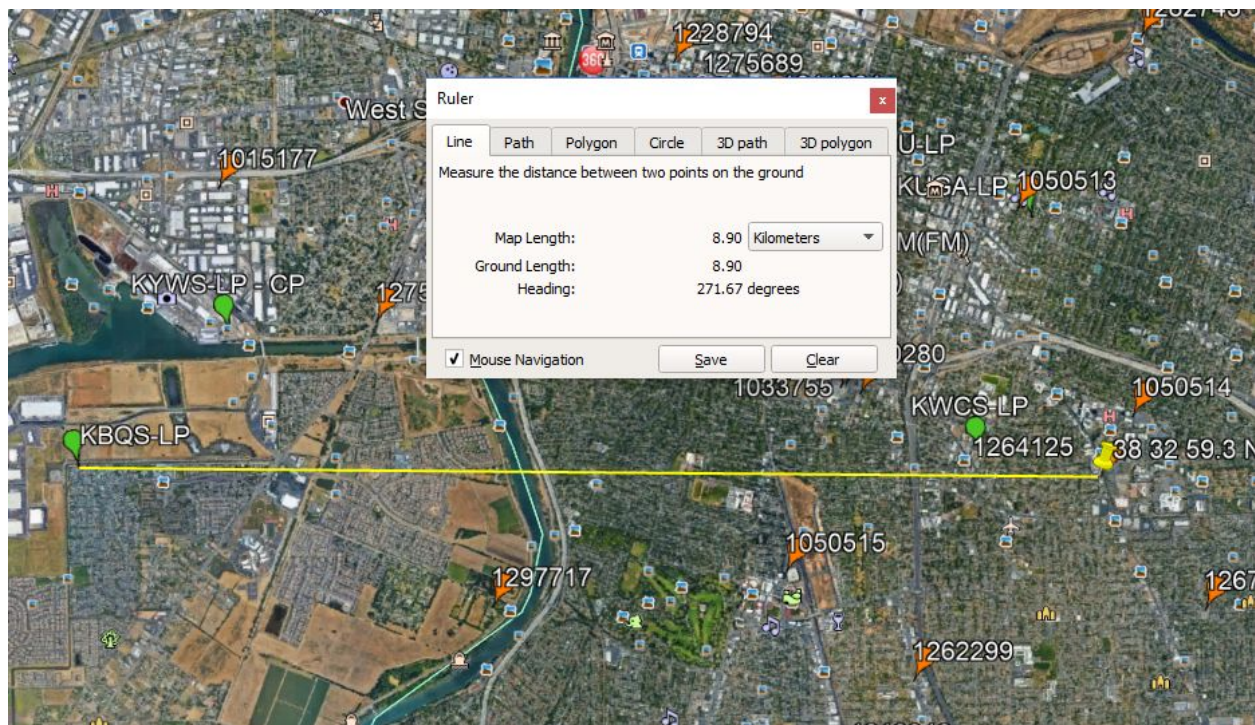
### **Waiver Request of 73.870(a)**

SBK respectfully requests a waiver of §73.870(a) because its the facility is located in a area of unresolvable co-channel interference, and difficult second adjacent overlap. Because of this, the licensee needs to move to another channel to make the station viable. The only open channel within 5.6 km is 92.1. Relocation to 92.1 is untenable because of the interference from co-channel facility KMJE (FM) Placerville, which proclaims Sacramento, California as its primary radio listing market. The owner(s) of KMJE have challenged two LPFM facilities in Sacramento

<sup>1</sup> *Creation of Low Power Radio Service*, Report and Order, 15 FCC Rcd 2205 at 2231 para. 64 (2000).



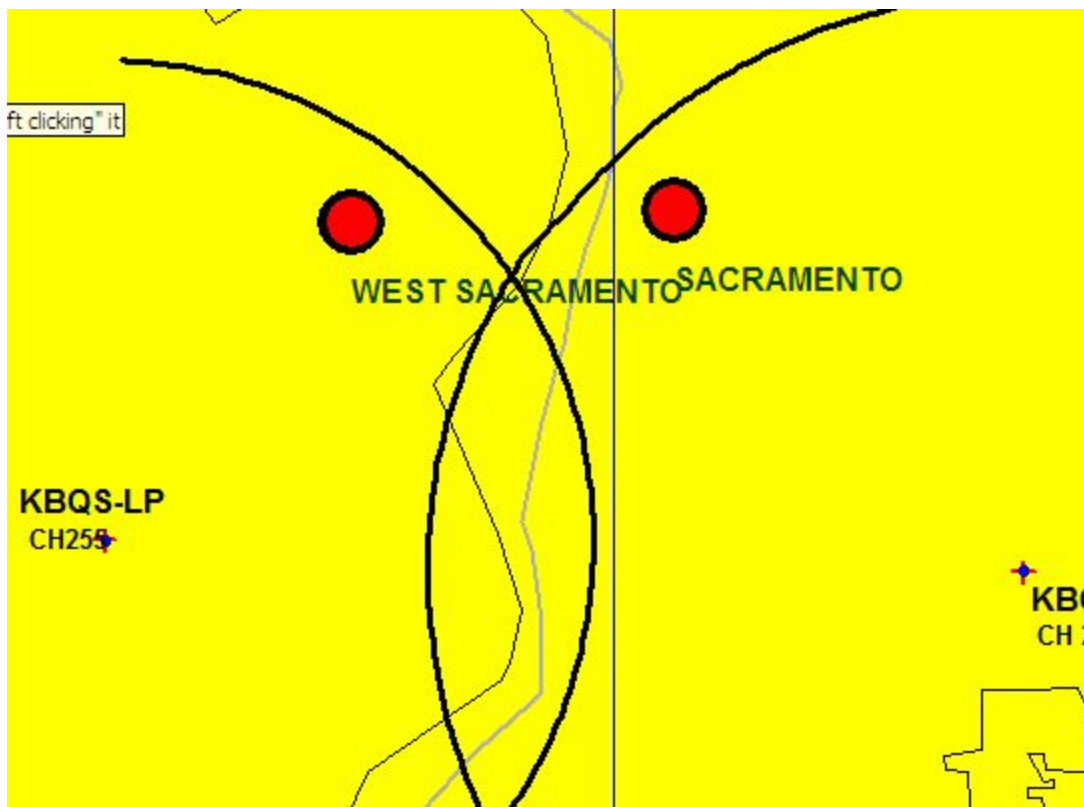
opting to utilize 92.1 FM, successfully moving those facilities off the channel.<sup>2</sup> Outside the 5.6 km relocation radius 107.5 FM is a fully-spaced LPFM radio channel:



The spacing map above demonstrates that it is impossible to utilize 107.5 FM without a waiver request because the 72.807 minimum spacing prohibits a 5.6 km move. So in total, SBK requests a waiver of considering the following--

<sup>2</sup> See KWCS-LP SACRAMENTO CA, WOMEN'S CIVIC IMPROVEMENT CLUB OF SACRAMENTO, INC File BNPL-20131104AU, and KUTZ-LP SACRAMENTO CA MIDTOWN RADIO BNPL-20131115ABH.

- (1) The ASRN tower proposed is the closest tower spot it can relocate to given the minimum spacing requirements.
- (2) Channel relocation is needed to make the facility's signal viable, and the only channel is open >5.6 km away.
- (3) The move is in the public interest because the Sacramento area will lose a low power educational community broadcaster if not (current facility inundated with interference, second adjacent channel U/D interference ratio too difficult to find a workable zero-population overlap).
- (4) A move of 8.9 km is only 2.401 km over the maximum allowable minor change under the rules of 6.499 km (taking into account rounding). This request is similar to many other requests.<sup>3</sup>
- (5) The current and proposed 60 dBu contours overlap (see below).



Conclusion: SBK believes the waiver request is in the public interest.

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<sup>3</sup> Examples: BMPL-20170817ABA KVBE-LP 10.9 km, BMPL-20170914ABV KTQA-LP 8.85 km, BPL-20160914ABD WAON-LP 8.65 km