

# EXHIBIT 11 – WAIVER REQUESTS

## WAIVER OF 73.870 REQUESTED

THE APPLICANT IS REQUESTING WAIVER OF SECTION 73.870 OF THE COMMISSION'S RULES WITH REGARD TO THE PROPOSED ANTENNA RELOCATION.

THE PROPOSED MOVE WILL BE 6.76 KILOMETERS, WHICH IS GREATER THAN THE 5.6 KILOMETERS PERMITTED UNDER THE COMMISSION'S RULES. APPLICANT IS LOSING USE OF ITS CURRENT SITE, A NEW SITE COULD NOT BE FOUND WITHIN THE REQUIRED DISTANCE, AND A WAIVER OF SECTION 73.870 OF THE COMMISSION'S RULES IS REQUESTED TO ALLOW THIS FACILITY TO CONTINUE TO PROVIDE ITS SERVICE TO THE PUBLIC. THE COMMISSION HAS FOUND IT APPROPRIATE TO APPROVE SUCH WAIVERS IN OTHER CASES UNDER SIMILAR CIRCUMSTANCES.<sup>1</sup>

## WAIVER OF 73.807 REQUESTED

The proposed transmitter site for KJCR-LP is short-spaced by 0.6 km (FCC rounded) with 2<sup>nd</sup> adjacent station KIFS, Ashland, OR (see Figure 1).

KJCR-LP Minor Modification Wtl Communications, Inc.							DISPLAY DATES	
REFERENCE	CLASS = L1					DATA	02-27-14	
42 24 13.2 N.	Current Spacings to 2nd Adj.					SEARCH	03-02-14	
123 21 40.7 W.	Channel 300 - 107.9 MHz							
Call	Channel	Location		Azi	Dist	FCC	Margin	
KJCR-LP	APP	300L1	Grants Pass	OR	0.0	0.00	23.5	-23.5
KJCR-LP	LIC	300L1	Grants Pass	OR	346.9	6.76	23.5	-16.7
KIFS	LIC-N	298C2	Ashland	OR	102.9	51.86	52.5	-0.6
DKBCC-LP	LIC	300L1	Cave Junction	OR	209.9	35.74	23.5	12.2
K300BE	LIC-D	300D	Ashland	OR	110.8	54.39	25.5	28.9
NEW	CP	300L1	Riddle	OR	359.2	58.90	23.5	35.4
KUMP-LP	LIC	300L1	Days Creek	OR	24.4	64.47	23.5	41.0
650069	APP	299D	Glide	OR	12.7	90.23	27.5	62.7
650119	APP	299D	Roseburg	OR	358.9	88.72	20.5	68.2
KBDF	LIC-N	299A	Diamond Lake	OR	48.7	132.22	55.5	76.7
650008	APP	299D	Elkton/days Creek	OR	355.3	111.62	20.5	91.1
KKLC	LIC-N	300C1	Fall River Mills	CA	142.1	209.65	110.5	99.2

All separation margins include rounding

FIGURE 1

### Per 73.807(e)(1)...

"(e)(1) *Waiver of the second-adjacent channel separations.* The Commission will entertain requests to waive the second-adjacent channel separations in paragraphs (a) through (c) of this section on a case-by-case basis. In each case, the LPFM station must establish, **using methods of predicting interference taking into account all relevant factors, including terrain-sensitive propagation models**, that its proposed operations will not result in interference to any

<sup>1</sup> For example, see BPL-20131025AAA, FCC ID# 135324, KVFS-LP, granted 1/10/2014; BPL-20130805AAA, FCC ID# 132224, WPHF-LP, granted 8/20/2013; and BPL-20120926ASY, FCC ID# 133357, WPVM-LP, granted 2/19/13.

authorized radio service. **The LPFM station may do so by demonstrating that no actual interference will occur due to intervening terrain or lack of population.** The LPFM station may use an undesired/desired signal strength ratio methodology to define areas of potential interference.”

**Figure 2 below demonstrates the existence of two intervening mountain ranges between the proposed KJCR-LP transmitter site and that of relevant station KIFS, Ashland, OR. Intervening terrain in excess of 300 meters elevation above the point-to-point path between the two sites (see Figure 2) virtually assures that the KIFS signal will be non-existent in the area of the KJCR-LP 100 dBu F(50,10) interfering signal.**

**Figure 3 below is a Longley/Rice study of the KIFS 60 dBu service area relative to the proposed KJCR-LP location, using standard methodology. The study shows any area in which the KIFS service is 60 dBu or greater. As evidenced by the map, the immediate Grants Pass area does not receive a 60 dBu service signal.**

**Figure 4 below is a map showing terrain relationships in the area of interest. The intervening mountainous terrain revealed in Figure 1 is evident.**

**Figure 5 below is a close-in Longley/Rice study of the area showing the 100 dBu F(50,10) interfering contour of the proposed facility and the closest related 60 dBu signal areas from KIFS. It is evident that at no point does the interfering contour reach, cross over, or obstruct the KIFS service area.**

**Figure 6 below is a close-in Longley/Rice study of the area with elevation back-drop, showing the 100 dBu F(50,50) interfering contour of the proposed, any 60 dBu service area signal from KIFS, and the intervening terrain blocking the signal from KIFS.**

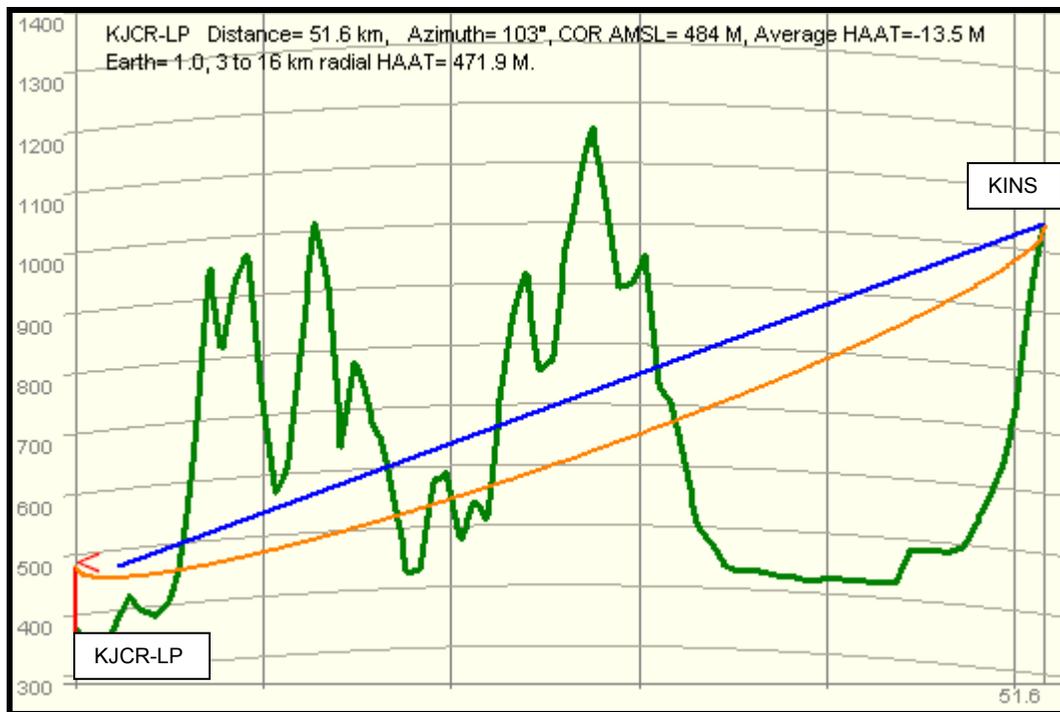


Figure 2

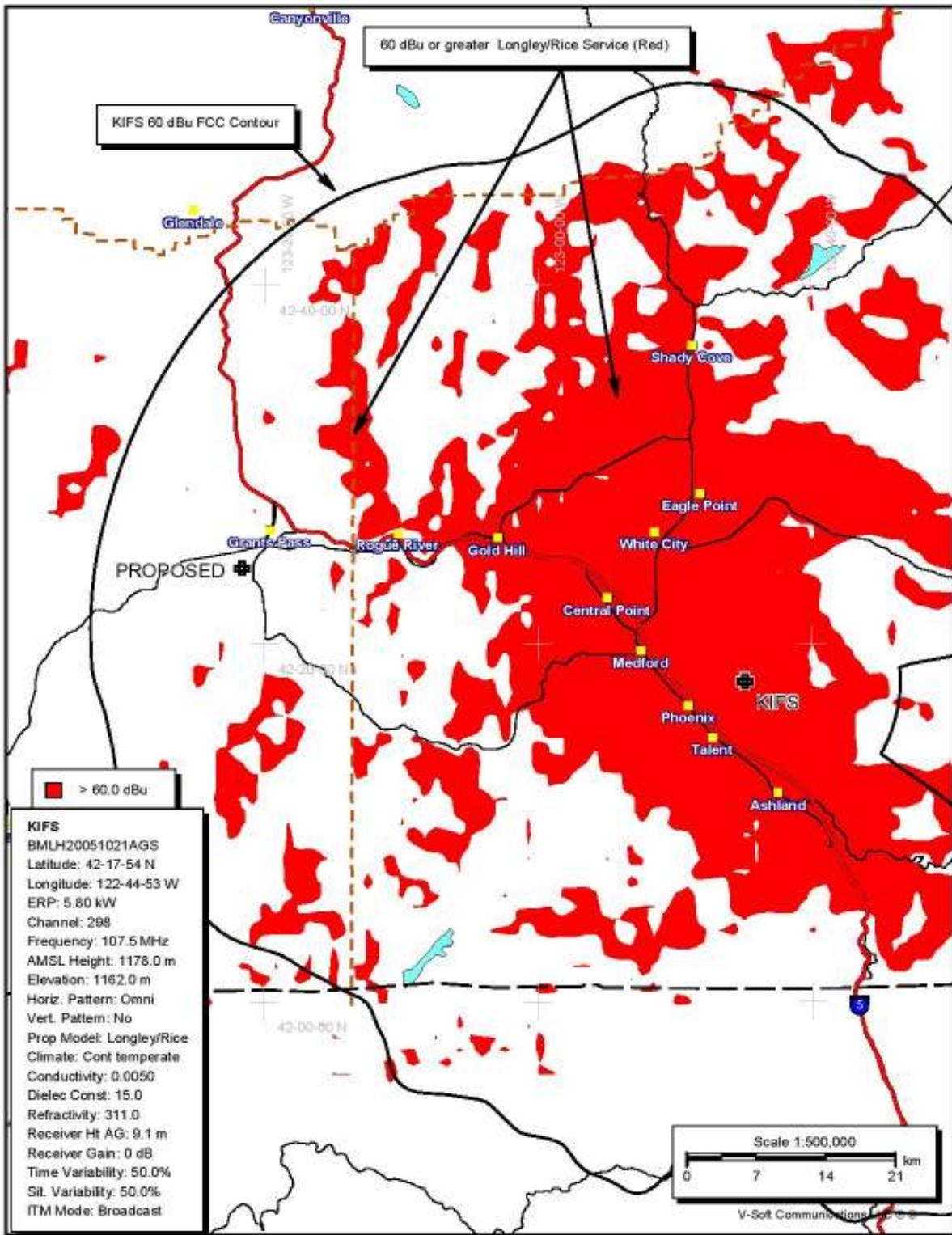


Figure 3

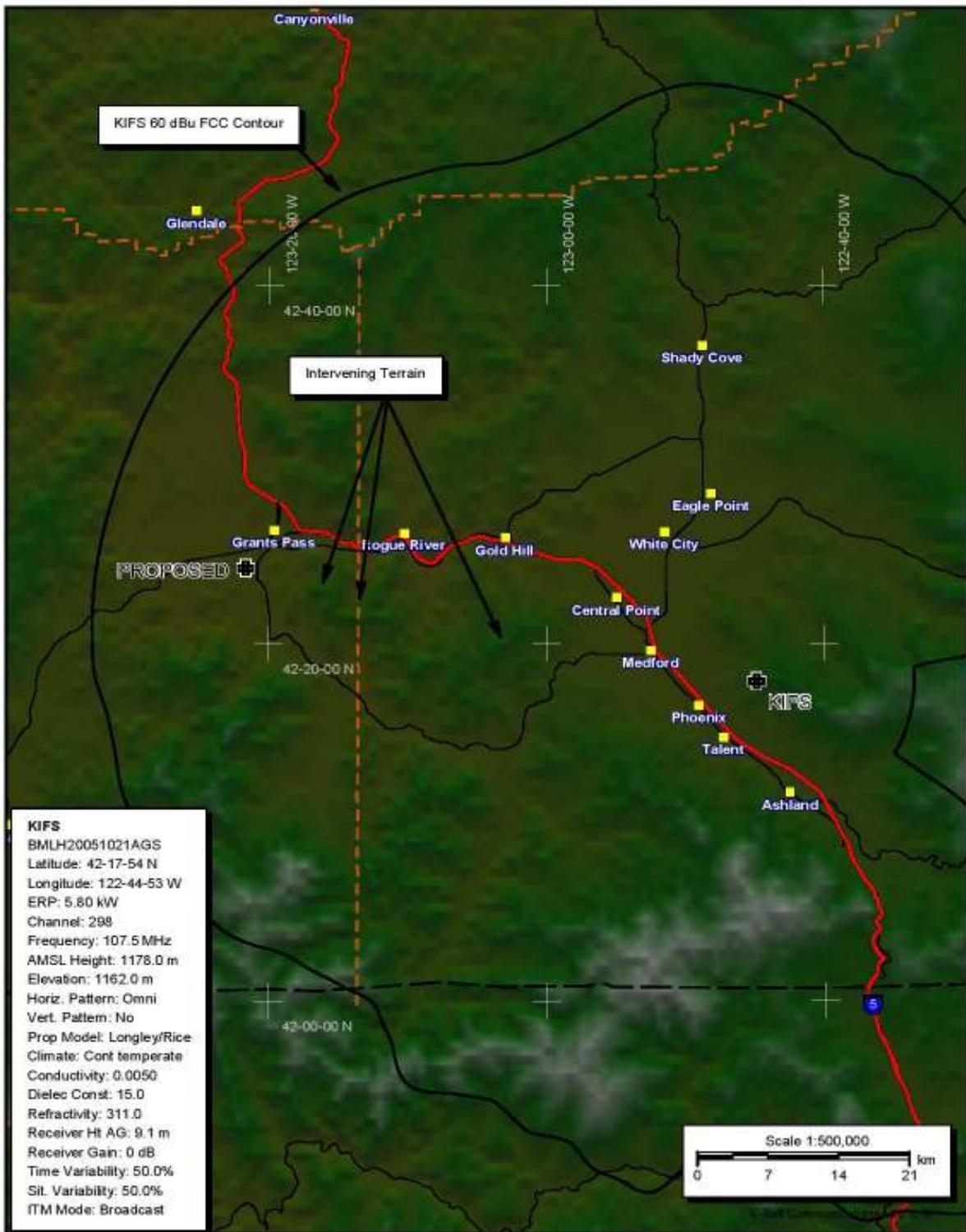


Figure 4

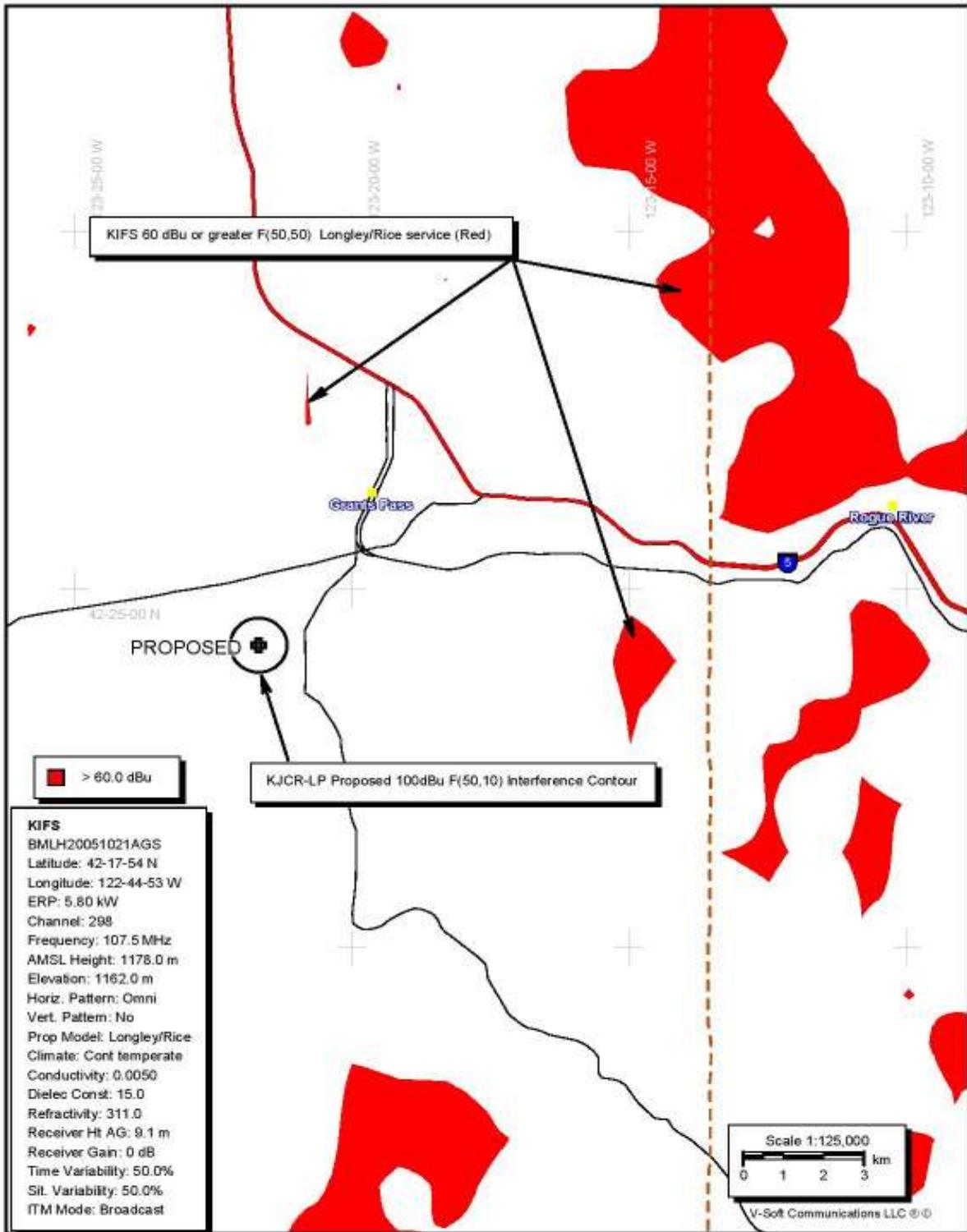


Figure 5

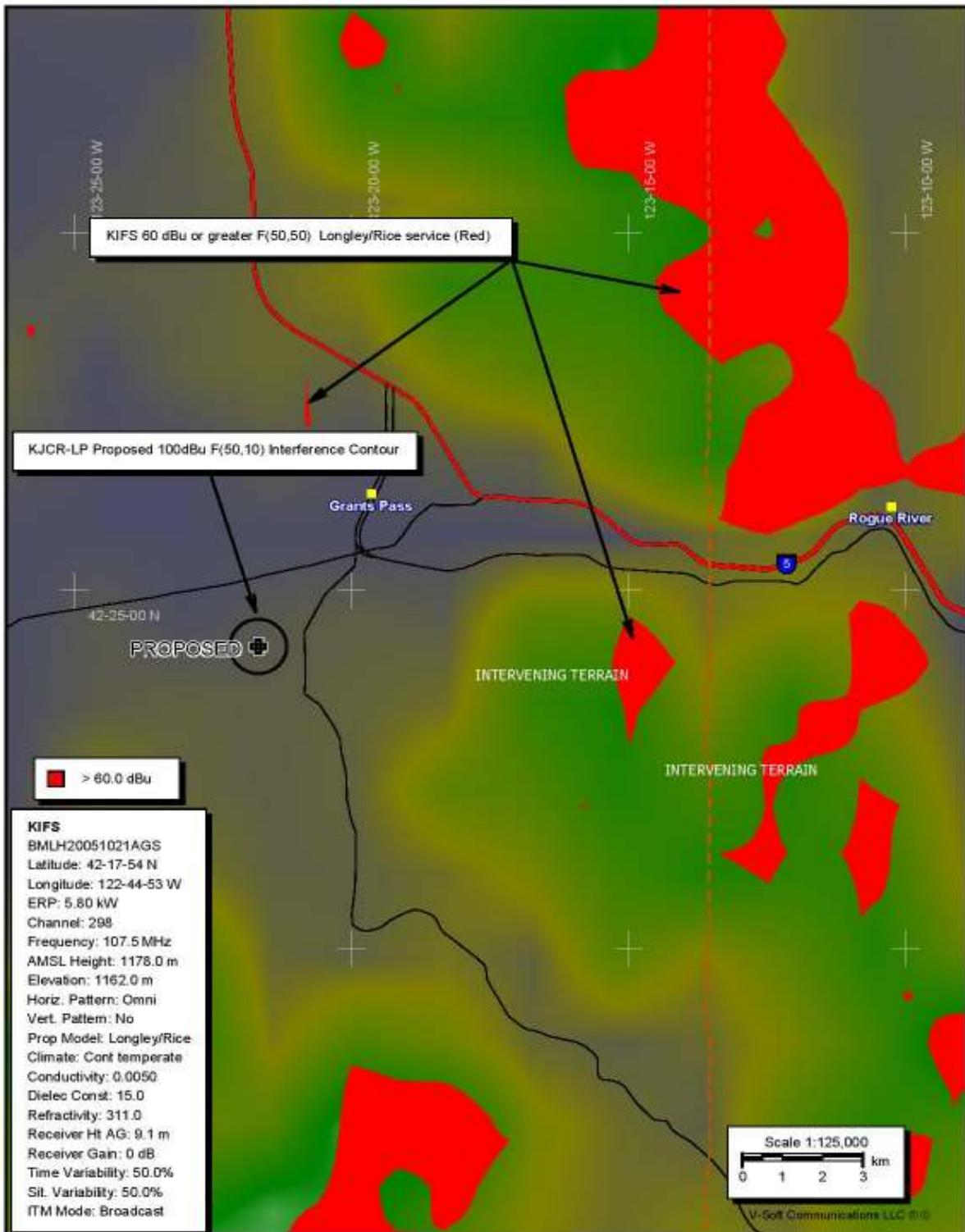


Figure 6

The applicant submits that it has adequately, “...using methods of predicting interference taking into account all relevant factors, including terrain-sensitive propagation models...”, demonstrated that “....no actual interference will occur due to intervening terrain...”, and therefore respectfully requests a waiver of 73.807(f) with regard to 2<sup>nd</sup> adjacent facility KIFS, Ashland, OR.

## FM TRANSLATOR/BOOSTER INTERFERENCE

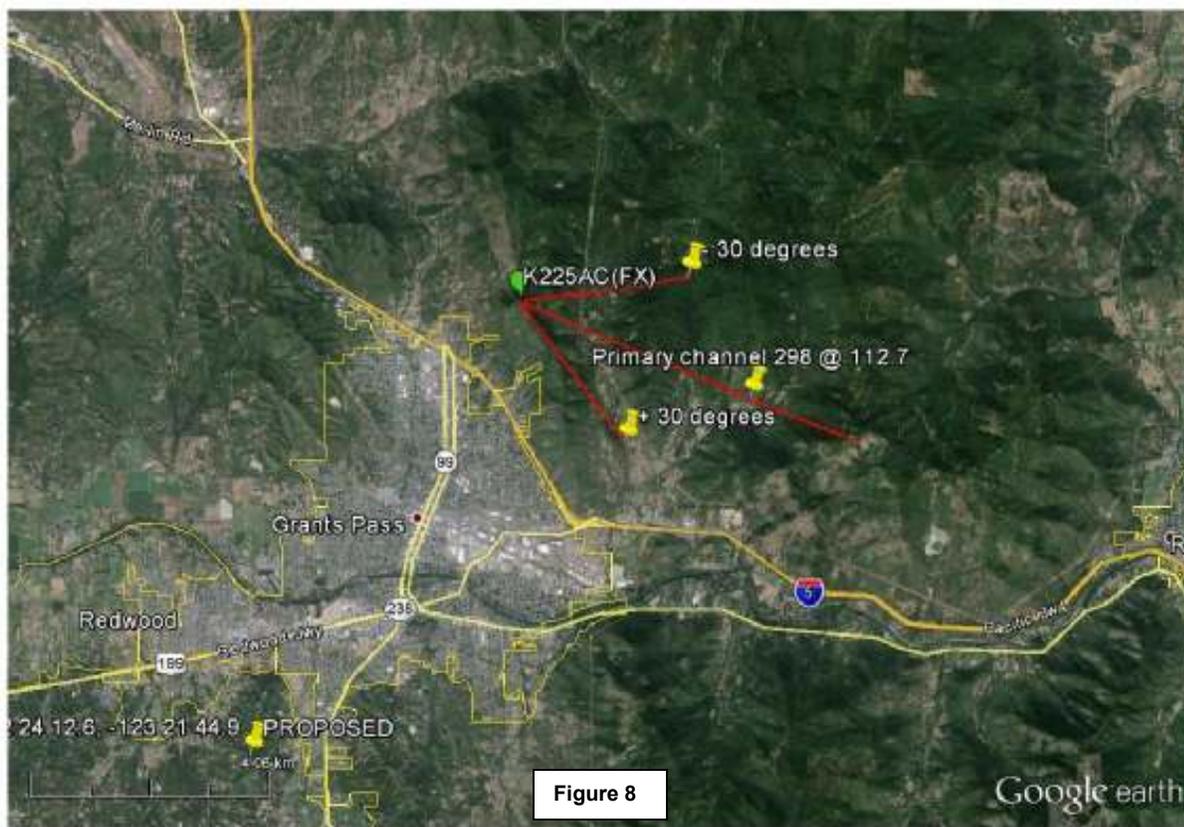
**Figure 7** details all FM translators/boosters located within a 10 km radius of the proposed transmitter site for KJCR-LP. KJCR-LP does not occupy a third adjacent channel relative to any of the off-air inputs to any of the translators, and therefore complies with 47 C.F.R. Section 73.827(a).

**GRANTS PASS, OR FM TRANSLATORS WITHIN 10 KM OF PROPOSED CHANNEL 300**

FCC ID	DISTANCE (km)	Translator INPUT	Primary CHANNEL
K201DI	7.54	KDOV(FM)	219
K217BZ	6.64	KSMF(FM)	206
K225AC	8.87	KIFS(FM)	298
K241AB	6.64	KTMT-FM	229
K254BS	6.59	KRWQ(FM)	262
K268BZ	8.9	KSOR(FM)	211
K284AF	6.64	KTMT-FM	229
K288CP	8.87	KRWQ(FM)	262

**FIGURE 7**

(NOTE: KJCR-LP is 2<sup>nd</sup> adjacent to the primary input of FM Translator K225AC (channel 298), however, as demonstrated in **Figure 8** below, KJCR is not located within the FCC defined capture zone of the translator.)



**Figure 8**

Google earth

miles 6  
km 10

