

TECHNICAL STATEMENT
K243BN LAVEEN, ARIZONA, CH. 243D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
NOVEMBER 2017

This Technical Statement is made in support of a minor modification of FM translator station, K243BN at Laveen, Arizona, facility ID 92373. K243BN seeks to relocate just 0.64 kilometers to an adjacent existing tower at the same Shaw Butte communications site. It will be a “fill-in” for KLVK(FM) Fountain Hills, Arizona, facility ID 76329, on channel 206C1. K243BN seeks to decrease its Height Above Sea Level antenna height from 688 meters to 669 meters. Its ERP will remain 250 watts with a directional antenna. No other changes are being made. The following will show that the new proposed operation of K243BN will meet all of the Commissions technical requirements for an FM translator station.

The new proposed operation of K243BN specifies a maximum Effective Radiated Power of 0.25 kilowatts (250 watts). It will operate with a directional antenna with an “off the shelf” type antenna, or a BEXT TFC2K-D with circular polarization. The antenna will be mounted on an existing non-registered tower, at the Shaw Butte communications tower site, with an overall height of 24 meters above the ground. The antenna will be mounted with a Center of Radiation of 24 meters above the ground, and 669 meters Above Mean Sea Level. The coordinates of this tower are located at N 33° 35’ 39.1”, W 112° 05’ 08.0”, NAD 27.

Figure 1 is a detailed interference study conducted on channel 243D with these new proposed facilities. It shows that the new operation of K243BN will not cause any

interference to any existing or proposed FM stations on any of the pertinent same channel or adjacent channels to channel 243 with the exception of second adjacent channel station, KMXF(FM) Phoenix, Arizona, facility ID 6361, operating on channel 245C and K241CS Phoenix, Arizona, facility ID 156046, channel 241D.

The proposed operation of K243BN on 243D is located within the protected 60 dB μ contour of 2nd adjacent channel of KMXF. Figure 2 shows the predicted F(50-50) field strength of KMXF at the proposed K243BN transmitter site is 85.7 dB μ . Therefore, the respective predicted interfering contour F(50-10) generated by the proposed K243BN on channel 243D is an additional 40 dB μ or 125.7 dB μ .

The proposed operation of K243BN on 243D is located within the protected 60 dB μ contour of 2nd adjacent channel of K241CS. Figure 3 shows the predicted F(50-50) field strength of K241CS at the proposed K243BN transmitter site is 109.3 dB μ . Therefore, the respective predicted interfering contour F(50-10) generated by the proposed K243BN on channel 243D is an additional 40 dB μ or 149.3 dB μ . K241CS also has a pending application, BPFT-20170206ACK. This application only calls for K241CS to increase its ERP from its current 200 watts to 250 watts and modify its directional antenna pattern. But it will remain at its present site and antenna heights. Thus the only effect of this application if granted will be to slightly increase the contour at the proposed K243BN site. K241CS is located on a tower directly adjacent to the proposed K243BN tower. Thus the predicted interference contour of K243BN will only extend 3.8 meters from the K243BN antenna. It will not reach the ground at any point.

Since the interference contour generated by K243BN will be larger towards KMXP(FM), only the 125.7 dB μ interference contour was studied for any population coverage.

Figure 4 shows the coverage area for the worse case 125.7 dB μ interference contour F(50-10) and shows that there is no population in the area of interference. The applicant, Mountain Community Translators, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference. There are no homes nearby the proposed existing tower site, which is a privately owned on 1/2 acres with private locked access. The transmitter building is uninhabited and does not have indoor plumbing. The area around the tower base has restricted access. The site is a dedicated communications tower site on top of "Shaw Butte". Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K243BN until such interference can be eliminated.

Figure 5 shows that the present 60 dB μ will completely overlap the proposed 60 dB μ of K243BN. In fact, the new proposed operation will be completely contained inside of the current 60 dB μ contour.

Figure 6 is the directional antenna data for the proposed operation of K243BN.

The proposed operation of K243BN Laveen, Arizona will be considered a "Fill-In" operation for KLVK(FM) Fountain Hills, Arizona. Figure 7 shows that the proposed 60 dB μ contour for the proposed K243BN will not extend beyond the present 60 dB μ of KLVK(FM). Since this is a "Fill-In" translator, the maximum ERP will not exceed the maximum permissible ERP of 250 watts in any azimuth.

It was found that the new proposed operation of K243BN Laveen, Arizona on channel 243D, will satisfy all of the required commission rules and regulations for an FM translator station.

FIGURE 1 - DETAILED CHANNEL INTERFERENCE STUDY

K243BN LAVEEN, AZ, CH 243D

REFERENCE
33 35 39.1 N.
112 05 08.0 W.

CH# 243D - 96.5 MHz, Pwr= 0.25 kW DA, HAAT= 0.0 M, COR= 669 M
Average Protected F(50-50)= 7.09 km
Standard Directional

DISPLAY DATES
DATA 11-29-17
SEARCH 11-30-17

CH CITY	CALL	TYPE STATE	ANT AZ	AZI <--	DI ST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
243D Laveen	K243BN	LIC _C_	AZ	292.4 112.4	0.64 BLFT20170920ABF	33 35 47.0 112 05 31.0	0.250 688	58.5	18.7 Mountain Community	-80.0*	-85.0*
243D Laveen	K243BN	APP _C_	AZ	0.0 0.0	0.00 BPFT20171005ACG	33 35 39.1 112 05 08.0	0.250 669	58.8	18.9 Mountain Community	-77.6*	-77.4*
243C Claypool	KI KO-FM	RSV-A	___	105.9 286.6	121.63	33 17 20.0 110 49 45.0	100.000 600	193.4 1945	83.6 1tv.com, Inc.	-77.0*	3.0
243C Claypool	KI KO-FM	APP DCX	AZ	105.9 286.6	121.63 BPH20170620ABH	33 17 20.0 110 49 45.0	34.000 966	189.2 2326	88.8 1tv.com, Inc.	-75.8*	1.7
245C Phoenix	KMXP	LIC _CY	AZ	175.3 355.3	28.93 BMLH19941024KC	33 20 03.0 112 03 36.0	100.000 475	12.5 834	85.8 Citicasters Licenses, Inc.	-0.4	-57.4*
241D Phoenix	K241CS	APP DC_	AZ	180.0 0.0	0.00 BPFT20170206ACK	33 35 39.0 112 05 08.0	0.250 663	1.1	18.6 Gabrielle Broadcasting Lic	-17.4*	-19.1*
241D Phoenix	K241CS	LIC DV_	AZ	180.0 0.0	0.00 BLFT20170126ABP	33 35 39.0 112 05 08.0	0.200 663	0.0	1.0 Gabrielle Broadcasting Lic	-16.3*	-1.5*
243C2 Claypool	KI KO-FM	CP _CX	AZ	105.9 286.6	121.63 BPH20160927ADT	33 17 20.0 110 49 45.0	0.680 1015	121.2 2352	49.0 1tv.com, Inc.	-8.0	41.1
241D Ft McDowell	K241BQ	LIC DC_	AZ	175.4 355.5	28.86 BLFT20171025AAL	33 20 05.0 112 03 39.0	0.140 803	0.0	2.4 Riviera Broadcasting, Lic	12.0	17.4
242C3 Wickenburg	KSWG	LIC ZCX	AZ	299.6 119.2	75.28 BLH20020311ABB	33 55 34.0 112 47 40.0	6.400 197	39.8 943	26.2 Barna Broadcasting, Lic	13.5	16.3
240D Tempe	K240EU	LIC DC_	AZ	91.3 271.4	30.17 BLFT20170802ABN	33 35 16.0 111 45 38.0	0.250 665	0.1	3.7 Crc Broadcasting Company,	19.7	24.1
242C3 Wickenburg	KSWG	APP ZCX	AZ	299.4 119.0	74.97 BPH20170510AAZ	33 55 22.0 112 47 34.0	5.300 217	33.2 960	22.3 Barna Broadcasting, Lic	19.8	20.0
240D Buckeye	K240DC	CP DV_	AZ	266.5 86.2	44.05 BPFT20160104AMC	33 34 09.0 112 33 33.0	0.250 1223	0.0	0.9 Advance Ministries, Inc. D	21.3	27.7
240D Buckeye	K240DC	LIC _V_	AZ	241.2 60.9	49.06 BLFT20070510ACT	33 22 51.0 112 32 53.0	0.060 -55	0.5 272	4.9 Advance Ministries, Inc. D	25.4	43.0
243D Casa Grande	K243BP	LIC _C_	AZ	157.9 338.1	92.49 BLFT20160418AAL	32 49 18.0 111 42 42.0	0.060 675	47.3	14.1 Mountain Community Transla	30.3	40.6
296C3 Apache Junction	KVVA-FM	LIC _CX	AZ	110.9 291.2	46.11 BLH20130315ABB	33 26 44.0 111 37 19.0	17.000 124	12.8 651	58.8 Entravision Holdings, Lic	11.5R	34.6M
242A Star Valley	1759589	RSV-A	___	45.9 226.4	105.97	34 15 16.0 111 15 26.0	6.000 100	54.3 1614	37.2 Kona Coast Radio, Lic	35.9	45.6
240C0 Cottonwood	KKLD	LIC NCX	AZ	358.6 178.6	121.21 BMLH20100428AEO	34 41 12.0 112 07 02.0	21.000 799	8.2 2388	78.1 Yavapai Broadcasting Corpo	94.0	42.1
244C2 Williams	KWMX	LIC _CN	AZ	358.5 178.5	170.54 BLH19970609KA	35 07 52.0 112 08 03.0	10.500 325	85.4 2390	55.8 Grenax Broadcasting Li, LI	66.9	84.5
297C2 Agui la	KAZV	CP ZCX	AZ	298.0 117.6	83.27 BNPH20070403ACO	33 56 36.0 112 52 53.0	50.000 150	12.8 929	58.8 Matinee Media Corporation	14.5R	68.8M
242A Star Valley	1759499	APP _CX	AZ	46.1 226.5	106.70 BNPH20170621ABC	34 15 26.0 111 14 58.0	0.750 -33	16.5 1489	11.0 Kona Coast Radio, Lic	76.2	69.0
242L1 Payson	KRIM-LP	LIC	___	44.1 224.5	102.37 BLL20150623ABI	34 15 13.0 111 18 39.0	0.004 146	1612	75.3 Payson Council For The Mus		72.2
297C2 Agui la	KAZV	APP _CX	AZ	292.6 112.1	88.80 BMPH20151022AFO	33 53 49.6 112 58 21.6	50.000 150	12.8 904	58.8 Matinee Media Corporation	14.5R	74.3M
243C Sonoi ta	NEW-FM	SO	___	207.8 27.2	233.73	31 43 44.0 113 14 15.0	0.000 181	0.0	92.0 211.9		76.1
241C Tucson	KLPX	LIC _CY	AZ	148.6 329.1	174.57 BLH19900503KD	32 14 56.0 111 06 59.0	100.000 595	13.1 1360	90.1 Arizona Lotus Corp.	147.8	84.3

CH CI TY	CALL	TYPE STATE	ANT STATE	AZI <--	DI ST FI LE #	LAT LNG	PWR(kW) HAAT (M)	INT(km) COR (M)	PRO(km) LICENSEE	Page # 2	
										IN (Overlap	*OUT* in km)
242D Cottonwood	K242BZ	LIC DV_		358.6 178.6	121.21 BLFT20101213AHP	34 41 12.0 112 07 02.0	0.093 802	3.7 2379	2.0 Yavapai	98.5	85.2 Broadcasting Corpo
246D Prescott	K246AA	LIC DCN		337.4 157.2	107.65 BLFT19931115TE	34 29 20.0 112 32 15.0	0.011 505	0.0 2173	3.2 Prescott	87.4	103.3 Sound Investments
243A Quartzsite	AL2673	RSV-A	___	273.4 92.2	199.47 RMinv-41	33 40 58.0 114 13 59.0	6.000 100	78.6 429	22.2	98.4	109.0
246C2 Kachina Village	AL9582	RSV-A	___	19.0 199.3	161.43 RM11518	34 58 06.0 111 30 29.0	50.000 150	5.8 2327	50.6	137.7	105.8
246C2 Kachina Village	KBTK	LIC _C_		19.0 199.3	161.43 BLH20161021ABF	34 58 06.0 111 30 29.0	5.000 444	4.3 2622	51.5 Grenax	139.2	107.6 Broadcasting Li, LI
244D Sedona	KWMX-FM2	LIC DC_		11.1 191.3	142.38 BLFTB20010821AAT	34 51 11.0 111 47 01.0	0.099 1475	9.2	6.5 Grenax	114.8	108.1 Broadcasting Li, LI
243A Quartzsite	KBUX	LIC _CX		273.5 92.3	199.45 BLH20170508AAJ	33 41 02.0 114 13 58.0	3.000 -47	53.3 281	13.2 Marvin Vosper	123.6	118.3
244D Flagstaff	KWMX-FM1	LIC DCN		13.6 193.9	188.10 BLFTB19971126TB	35 14 27.0 111 35 48.0	0.100 601	38.4 2835	24.4 Grenax	131.6	135.7 Broadcasting Li, LI
244C3 Lake Havasu City	KRCY-FM	LIC _CX		299.3 118.1	221.68 BLH20080731ACG	34 33 06.0 114 11 37.0	0.260 825	53.2 1451	34.0 Rick L. Murphy	146.6	153.5
246C3 Green Valley	KYWD	CP_ZCX		145.4 326.1	213.79 BPH20141014ABL	32 00 10.7 110 47 48.7	25.000 100	5.7 1063	51.3 Capstar Tx, LIc	195.0	162.3
246A Green Valley	KYWD	LIC _CX		152.6 333.2	201.67 BLH20030424AAM	31 58 37.0 111 06 04.0	1.750 187	2.6 1227	36.2 Capstar Tx, LIc	184.8	165.1
244B Nogales	XHNGSFM	USE	___	156.7 337.3	273.49	31 19 49.0 110 56 42.0	50.000 150	90.3 1424	65.0	168.0	186.5
243A Cd. Morelos	R17613	VAC	___	248.2 66.7	278.56	32 38 00.0 114 50 54.0	3.000 100	75.2 142	24.0	180.3	185.3
244B Nogales	XHNGSFM	OPE _HN		157.0 337.6	274.05	31 19 10.0 110 57 36.0	38.400 37	72.0 1323	65.0	186.8	187.0
240C3 Wellton	KUKY	LIC _CX		244.6 63.3	233.57 BLH20120803AAD	32 40 22.0 114 20 11.2	1.600 385	2.6 534	41.5 Hi spanic Target Media Inc.	207.9	190.7
243A Lagunitas	AL1171	VAC	___	246.4 64.8	289.61	32 31 05.0 114 54 58.0	3.000 100	75.3 127	24.0	191.3	196.2
296A Pima	VA2384	VAC _N		110.8 292.0	233.29	32 49 46.0 109 45 16.0	6.000 100	12.8 1116	58.8	9.5R	223.8M
245A Algodones	AL8864	VAC	___	248.9 67.4	266.37	32 42 09.0 114 44 30.0	3.000 100	2.3 166	24.0	241.0	241.3
296C1 Needles	KNKK	LIC _CX		308.0 126.7	263.66 BLH20020708AAZ	35 01 58.0 114 21 57.0	16.500 582	12.8 1368	58.8 Cameron Broadcasting, Inc.	21.5R	242.2M
242C Las Vegas	KKLZ	LIC _CX		316.0 134.4	378.29 BMLH20111201LCE	36 00 29.0 115 00 20.0	100.000 358	112.8 1056	76.6 Beasley Media Group, LIc	244.0	270.1
245C1 Mexicali	6891		___	247.4 65.7	327.06	32 25 20.0 115 18 12.0	0.000	0.0 69	72.0	304.0	254.0
243A Douglas	KDAP-FM	LIC _CN		135.6 317.0	344.08 BLH19901121KB	31 21 18.0 109 33 06.0	3.000 9	64.5 1271	17.5 Donna Henderson, Personal	268.1	293.3
296B Ciudad Morelos	AL8716	VAC	___	248.2 66.7	279.15	32 38 00.0 114 51 00.0	50.000 150	12.8 192	58.8	10.0R	269.2M
296A Nogales	R17547	VAC	___	156.8 337.4	274.15	31 19 07.0 110 56 45.0	3.000 100	12.8 1383	58.8	5.0R	269.2M
242A Calipatria	KSSB	LIC _CX		261.5 79.7	323.22 BLH20140623AAK	33 07 13.0 115 30 43.0	6.000 25	23.5 -16	15.8 Lazer Licenses, LIc	276.9	273.4
242A Caborca	AL0480	VAC	___	181.2 1.2	322.15	30 41 50.0 112 09 29.0	3.000 100	27.7 400	24.0	275.5	273.5
242AA Santa Ana	R17224	VAC	___	164.7 345.2	351.57	30 32 23.0 111 07 10.0	6.000 100	46.4 836	28.0	288.6	305.8
241C1 Window Rock	KWRK	LIC _CY		50.4 232.1	349.54 BLH19960911KD	35 33 36.0 109 06 30.0	100.000 178	5.8 2321	50.8 The Navajo Nation	328.2	294.1

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	Page # 3 *IN* (Overlap in km)	*OUT*
245A Caborca	AL8589	VAC SO	___	181.2 1.2	322.15	30 41 50.0 112 09 29.0	3.000 100	1.9 400	24.0	301.3	297.6
296B Caborca	AL9098	VAC SO	___	181.2 1.2	321.30	30 41 50.0 112 09 29.0	50.000 150	12.8 450	58.8	10.0R	311.3M
297A Cananea	R17613	VAC SO	___	149.5 330.5	334.93	30 58 55.0 110 18 02.0	3.000 100	12.8 1670	58.8	5.0R	329.9M
241A Nacozari De Garcia	AL0055	VAC SO	___	189.2 8.9	362.59	30 22 25.0 112 41 30.0	3.000 100	2.6 214	24.0	340.0	337.9
245A Puerto Lobos	AL9054	VAC SO	___	190.9 10.5	376.49	30 16 00.0 112 49 35.0	3.000 100	2.2 158	24.0	354.1	351.8
297C2 Chinle	KFXR-FM	LIC AZ	_CN	33.2 214.5	368.72 BLH19950908KE	36 21 07.0 109 49 54.0	3.600 497	12.8 2507	58.8 Cc Licenses, LIc	14.5R	354.2M

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
All separation margins (if shown) include rounding.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
***affixed to 'IN' or 'OUT' values = site inside restricted contour.
Reference station has protected zone issue: Mexico

* No actual interference will be caused to either KMXP and K241CS since the worse case 125.7 DBU interference contour will not cover any population. See the Technical Statement for more details.

K243BN

BLFT20170721ABB

Latitude: 33-35-39.10 N

Longitude: 112-05-08 W

ERP: 0.25 kW

Channel: 243

Frequency: 96.5 MHz

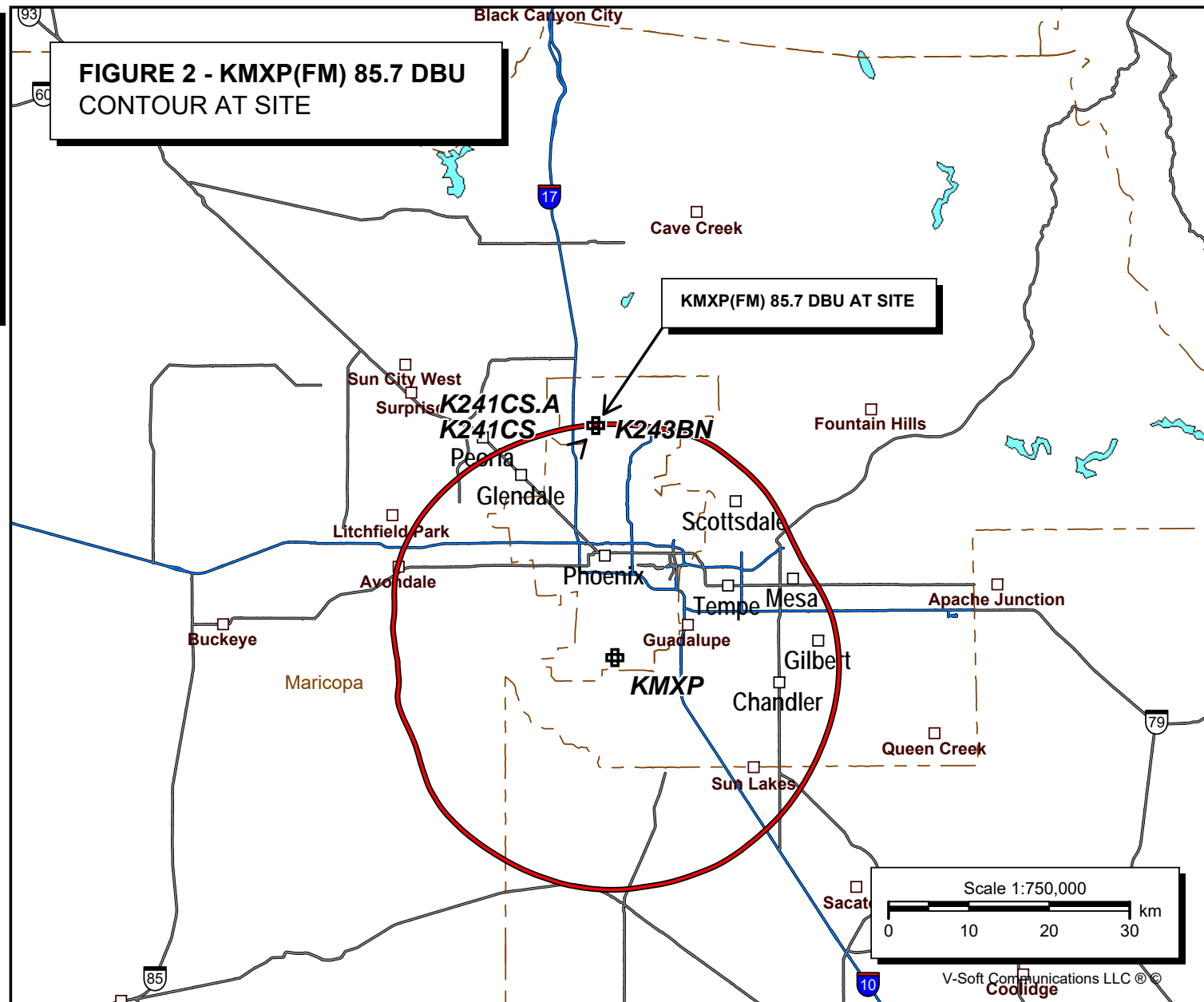
AMSL Height: 662.0 m

Elevation: 645.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model:

**FIGURE 2 - KMXB(FM) 85.7 DBU
CONTOUR AT SITE**

K243BN

BLFT20170721ABB

Latitude: 33-35-39.10 N

Longitude: 112-05-08 W

ERP: 0.25 kW

Channel: 243

Frequency: 96.5 MHz

AMSL Height: 662.0 m

Elevation: 645.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model:

**FIGURE 3 - K241CS 109.3 DBU
CONTOUR AT SITE**

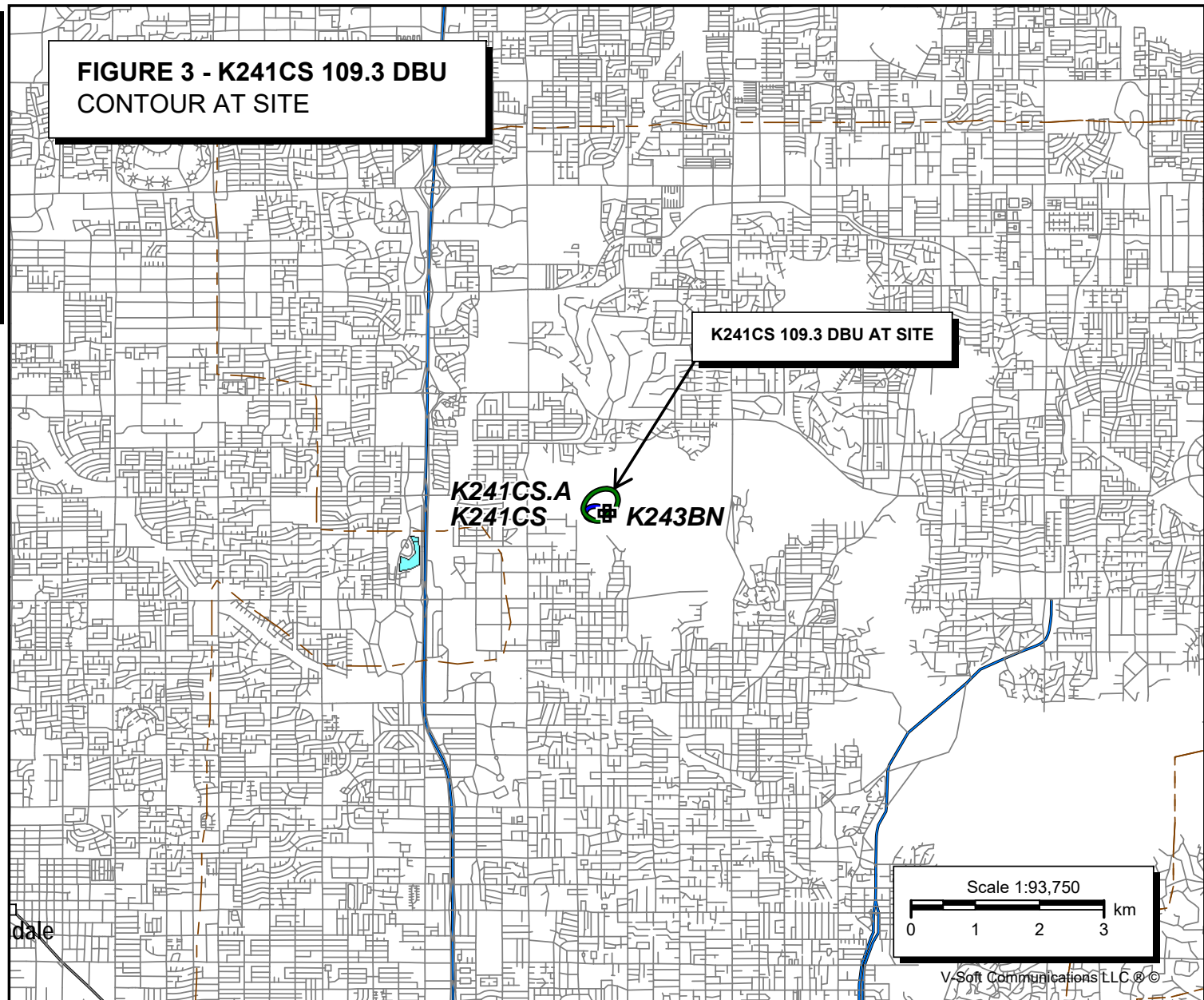


FIGURE 4 - PREDICTED 125.7 DBU INTERFERENCE CONTOUR
K243BN LAVEEN, AZ, CH 243D

Coverage Study - NGDC 30 SEC
11-30-2017

K243BN CH243 D , 0.25 kW, 0.0m HAAT, 669.0m COR AMSL
Interference Contour = 125.7 dBu. Population = 0

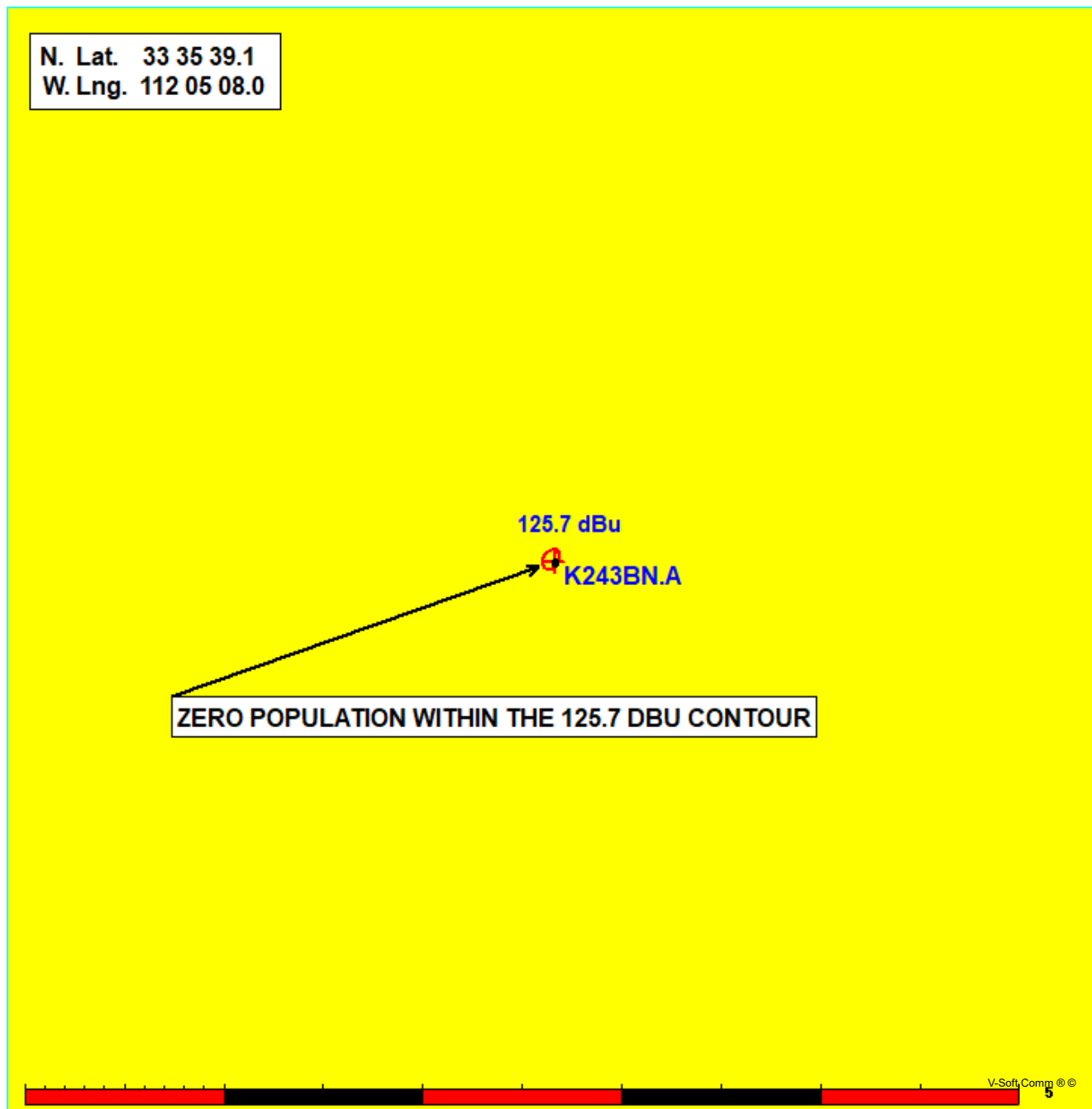


FIGURE 5 - PRESENT AND PROPOSED 60 DBU
K243BN LAVEEN, AZ, CH 243D

Coverage Study - NGDC 30 SEC
11-30-2017

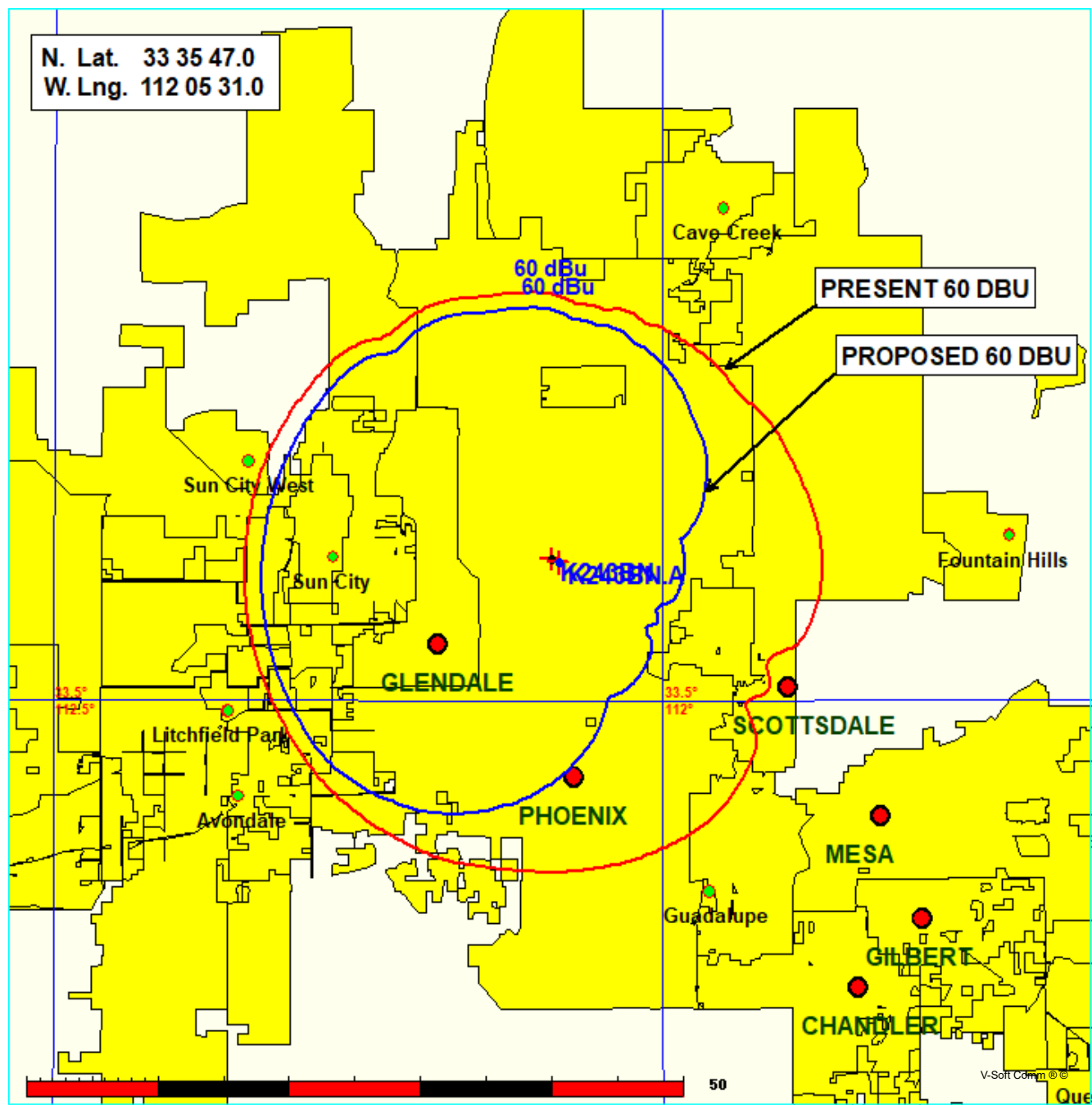


FIGURE 6 DIRECTIONAL ANTENNA DATA

K243BN. A

11-30-2017

RMS(V) = .764

BEXT TFC2K-D

Graph is Relative Field

Azi	Field	dBk	kW
000	0.990	-06.108	0.245
010	0.970	-06.285	0.235
020	0.910	-06.840	0.207
030	0.840	-07.535	0.176
040	0.740	-08.636	0.137
050	0.630	-10.034	0.099
060	0.500	-12.041	0.063
070	0.370	-14.657	0.034
080	0.230	-18.786	0.013
090	0.230	-18.786	0.013
100	0.230	-18.786	0.013
110	0.230	-18.786	0.013
120	0.230	-18.786	0.013
130	0.230	-18.786	0.013
140	0.230	-18.786	0.013
150	0.230	-18.786	0.013
160	0.230	-18.786	0.013
170	0.370	-14.657	0.034
180	0.500	-12.041	0.063
190	0.630	-10.034	0.099
200	0.740	-08.636	0.137
210	0.840	-07.535	0.176
220	0.910	-06.840	0.207
230	0.970	-06.285	0.235
240	0.990	-06.108	0.245
250	1.000	-06.021	0.250
260	1.000	-06.021	0.250
270	1.000	-06.021	0.250
280	1.000	-06.021	0.250
290	1.000	-06.021	0.250
300	1.000	-06.021	0.250
310	1.000	-06.021	0.250
320	1.000	-06.021	0.250
330	1.000	-06.021	0.250
340	1.000	-06.021	0.250
350	1.000	-06.021	0.250

oriented at 300
degrees

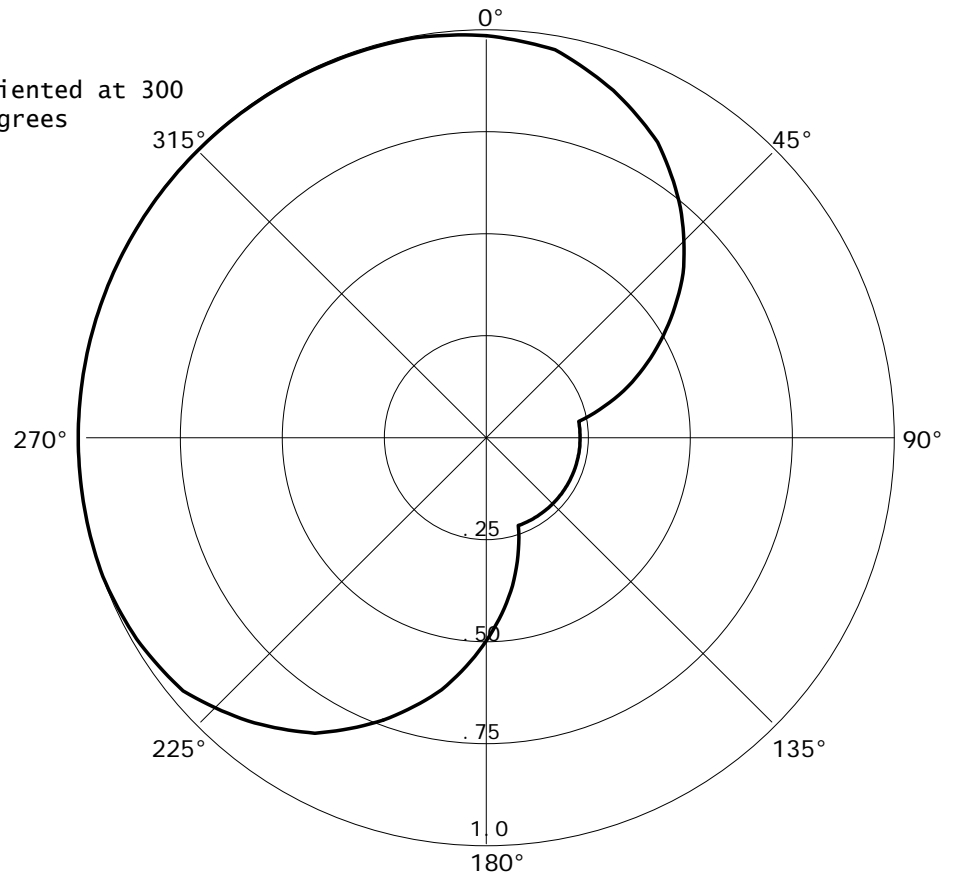


FIGURE 7 - FILL-IN MAP WITH KLVK(FM)
K243BN LAVEEN, AZ, CH. 243D

Coverage Study - NGDC 30 SEC
11-30-2017

