

TECHNICAL STATEMENT
K215ER LOVELAND, COLORADO
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
JULY 2010

This Technical Statement is made in support of a minor change application for FM translator station, K215ER licensed to Loveland, Colorado, facility ID 140256. K215ER seeks to “one step” channel change from its present licensed operation on channel 215D to its I.F. channel of 269D. It also seeks to increase its Effective Radiated Power from 6 watts to 10 watts, and modify its current directional antenna system to a non-directional antenna. The following will show that the new proposed operation of K215ER will meet all of the Commission's technical requirements for an FM translator station.

The new proposed operation of K215ER specifies a maximum Effective Radiated Power of 10 watts. It will operate with a non-directional antenna, a Nicom Model BKG-77, circular polarized, one bay antenna. The antenna will be mounted on an existing unregistered tower with an overall height of 27 meters above the ground. The antenna will be mounted with a Center of Radiation of 15 meters above the ground, and 2085 meters Above Mean Sea Level. The coordinates of this tower are located at N 40° 29' 37", W 105° 10' 53". K215ER will simply replace its current antenna system with the new one bay non-directional antenna at the same height and location on the tower. The existing transmission will be utilized. Thus, no disturbance to other users of the tower will be made.

Figure 1 is a detailed interference study conducted on channel 269D with these new proposed facilities. It shows that the new operation of K215ER will not cause any interference to any existing or proposed FM stations on any of the pertinent same channel or adjacent channels to channel 269, with the exception of KRKY-FM Estes Park, Colorado operating on channel 271A, facility ID 76780, and its associated booster station, KRKY-FM2 Fort Collins, Colorado, facility ID 169661. The proposed operation of K215ER on 269D is located within the protected 60 dB μ contour of 2nd adjacent channel of KRKY-FM. Figure 2 shows the predicted F(50-50) field strength of KRKY-FM at the proposed K215ER transmitter site is 72.4 dB μ . Therefore, the respective predicted interfering contour F(50-10) generated by the proposed K215ER on channel 269D is an additional 40 dB μ or 112.4 dB μ . Figure 3 shows the coverage area for the 100 dB μ (worse case) 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 40 acre square wooded area, with private access. The transmitter building is uninhabited and does not have indoor plumbing. Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K215ER until such interference can be eliminated.

The KRKY-FM2 booster is located at the same site as K215ER and operates with a greater ERP, or 65 watts. Since even the worse case 100 dB μ interference contour

shows no population coverage, it can be assumed that no actual interference will occur to both the main signal and booster signal of KRKY-FM Estes Park.

Since the proposed operation of K215ER on channel 269D is located at the same site as the currently licensed operation of K215ER, it can be assumed that the proposed operation of K215ER on channel 269D will 60 dB μ overlap with the current facilities.

It was found that the new proposed operation of K215ER Loveland, Colorado on channel 269D, will satisfy all of the required commission rules and regulations for an FM translator station.

FIGURE 1, DETAILED INTERFERENCE STUDY
 K215ER LOVELAND, COLORADO, CH. 269D
 Average Protected F(50-50) = 3.15 km
 Omni-directional

REFERENCE
 40 29 37.0 N.
 105 10 53.0 W.

CH# 269D - 101.7 MHz, Pwr= 0.01 kW, HAAT= 0.0 M, COR= 2085 M

DISPLAY DATES
 DATA 07-31-10
 SEARCH 08-02-10

CH CITY	CALL	TYPE STATE	ANT AZI <--	DIST FILE #	LAT LNG	PWR (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	*IN* (Overlap in km)	*OUT* (Overlap in km)
268C Strasburg	KTNI-FM	LIC NC_ CO	121.3 302.1	120.9 BMLH20081028ABX	39 55 22.0 103 58 18.0	97.000 625	138.4 2109	93.3 Max Radio Of Denver Llc	-30.1*<	7.8
271A Estes Park	KRKY-FM *	LIC _HX CO	242.8 62.6	32.3 BLH20070117AAE	40 21 38.0 105 31 12.0	6.000 25	4.7 2739	58.5 United States Cp, Llc	21.6	-26.4*< *
271D Fort Collins	KRKY-FM2 *	LIC DC_ CO	0.0 0.0	0.0 BLFTB20070404AAP	40 29 37.0 105 10 53.0	0.065	0.5 2090	16.7 United States Cp, Llc	-11.3*<	-16.9*< *
269C1 Eagle	KSKE-FM	LIC ZC_ CO	239.1 58.1	161.4 BLH20050915ADE	39 44 18.0 106 47 58.0	12.000 667	156.0 3171	74.6 Nrc Broadcasting Mountain	-3.4<	66.6
270C2 Burns	KIGN	LIC _CN WY	31.7 212.1	81.6 BMLH19950920KD	41 07 01.0 104 40 07.0	50.000 150	71.1 1963	46.8 Gap Broadcasting Cheyenne	-2.0<	16.1
269D Boulder	K269AE	LIC ?HN CO	182.7 2.7	59.3 BLFT221	39 57 38.0 105 12 52.0	0.103 -58	42.9 1747	12.9 Wilks License Company-denv	4.1	3.4
266C Denver	KOSI	LIC DC_ CO	183.1 3.1	85.0 BLH20020118AAJ	39 43 45.0 105 14 06.0	100.000 495	9.8 2262	72.8 Entercom Denver License, L	63.2	12.0
268D Commerce City	KTNI-FM1	LIC DC_ CO	163.8 344.0	94.6 BLFTB20050802ABY	39 40 31.0 104 52 22.0	20.000	61.0 1766	42.1 Max Radio Of Denver Llc	21.9	34.2
270C3 Centennial	KKHI	LIC NC_ CO	174.7 354.8	123.6 BLH20071207AAY	39 23 07.0 105 02 52.0	9.500 163	87.6 2226	58.7 Bustos Media Of Colorado L	23.5	45.9
271D Estes Park	K271BN	CP DC_ CO	99.0 279.3	39.3 BPFFT20100427ACW	40 26 15.0 104 43 25.0	0.250	1.0 1517	6.9 Mountain Community Transla	25.6	32.2
271D Estes Park	K271BN	LIC DC_ CO	99.0 279.3	39.3 BLFT20091103ABR	40 26 15.0 104 43 25.0	0.041	0.4 1525	6.9 Mountain Community Transla	26.0	32.2
270L1 Brighton	KAMV-LP	LIC ___ CO	151.5 331.7	63.7 BLL20061207ABW	39 59 21.8 104 49 26.9	0.100	8.0 1538	6.7 Alianza Ministerial Vision	43.2	38.4
272D Boulder	KDSP-FM2	LIC DV_ CO	180.6 0.6	53.5 BLFTB20070725AEH	40 00 43.0 105 11 16.0	0.250	0.2 1661	5.1 Moreland Properties, Llc	41.1	48.2
269D Evergreen	K269CL	LIC DHN CO	185.5 5.4	97.1 BLFT19950811TB	39 37 24.0 105 17 24.0	0.035 354	12.9 2646	11.6 Citicasters Licenses, Inc.	72.6	45.5
272A Greenwood Village	KDSP	LIC DCX CO	183.2 3.1	84.6 BLH20070514AGO	39 43 59.0 105 14 10.0	1.000 238	2.1 2256	36.0 Moreland Properties, Llc	70.3	48.4
268D Cheyenne	K268BX	CP _C_ WY	24.0 204.2	78.2 BPFFT20100224ABW	41 08 09.0 104 48 07.0	0.250	10.1 1879	7.1 Brahmin Broadcasting Corp.	55.5	52.0
270D Golden	640689	APP DV_ CO	183.1 3.1	85.0 BNPFFT20030314BOM	39 43 46.0 105 14 08.0	0.010	14.6 2244	12.0 Mary Medicus	58.1	55.5
268D Cheyenne	K268BX	LIC _C_ WY	28.3 208.6	84.3 BLFT20090925ACB	41 09 37.0 104 42 13.0	0.099	10.2 1909	8.4 Brahmin Broadcasting Corp.	61.5	57.1
270D Granby	K270AL	LIC DC_ CO	232.0 51.5	81.6 BLFT20070329AOS	40 02 24.0 105 56 11.0	0.010	2.4 2530	3.6 Nrc Broadcasting Mountain	69.8	69.4
272D Laramie	K272EW	CP DC_ WY	346.0 165.8	93.6 BMPFFT20090304AAR	41 18 39.0 105 27 12.0	0.024	0.3 2744	8.6 Mitchell A. Beranek	87.6	84.8
269C2 Westcliffe	KXCL	CP ZHX CO	181.4 1.3	250.5 BPH20080606AES	38 14 18.0 105 14 58.0	17.500 258	145.3 2724	72.4 United States Cp, Llc	94.4	137.2
271A Breckenridge	KSMT	LIC ZCX CO	213.3 32.8	132.4 BLH20070504ABR	39 29 44.0 106 01 44.0	6.000 -64	3.2 3250	24.9 Nrc Broadcasting Mountain	120.3	107.3
269A Wheatland	KZEW	LIC _CN WY	6.4 186.6	173.5 BLH19850723KC	42 02 44.0 104 56 47.0	3.000 38	53.3 1503	13.2 Smith Broadcasting, Incorp	108.1	120.8
271C2 Hanna	KBDY	LIC NC_ WY	318.8 137.9	169.7 BLH20090109AHF	41 38 00.9 106 31 32.1	0.630 1050	1.7 3409	50.2 Toga Radio Llc	164.8	119.2
267C0 Bridgeport	KOZY-FM	LIC _C_ NE	36.7 217.6	187.8 BLH20010827AAD	41 50 23.0 103 49 36.0	100.000 339	9.7 1630	64.7 Legacy Communications, Llc	166.1	122.9

CH	CALL	TYPE	ANT	AZI	DIST	LAT	PWR (kW)	INT (km)	PRO (km)	Page #	2
CITY		STATE		<--	FILE #	LNG	HAAT (M)	COR (M)	LICENSEE	*IN*	*OUT*
										(Overlap in km)	

Terrain database is USGS 03 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 = 2, Co to 3rd adjacent.
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 protected contour.

* No actual interference will be caused to either KRKY-FM or KRKY-FM2 since there is no population residing inside of the proposed K215ER 100 DBU INTERFERENCE CONTOUR.

FIGURE 2, KRKY-FM 72.4 DBU CONTOUR
K215ER LOVELAND, COLORADO, CH. 269D

Coverage Study - USGS 03 SEC
08-02-2010

KRKY-FM CH271 A , 6.0 kW, 25.0M HAAT, 2739.0M COR AMSL
Service Contour = 72.4 dBu. Population = 1,530

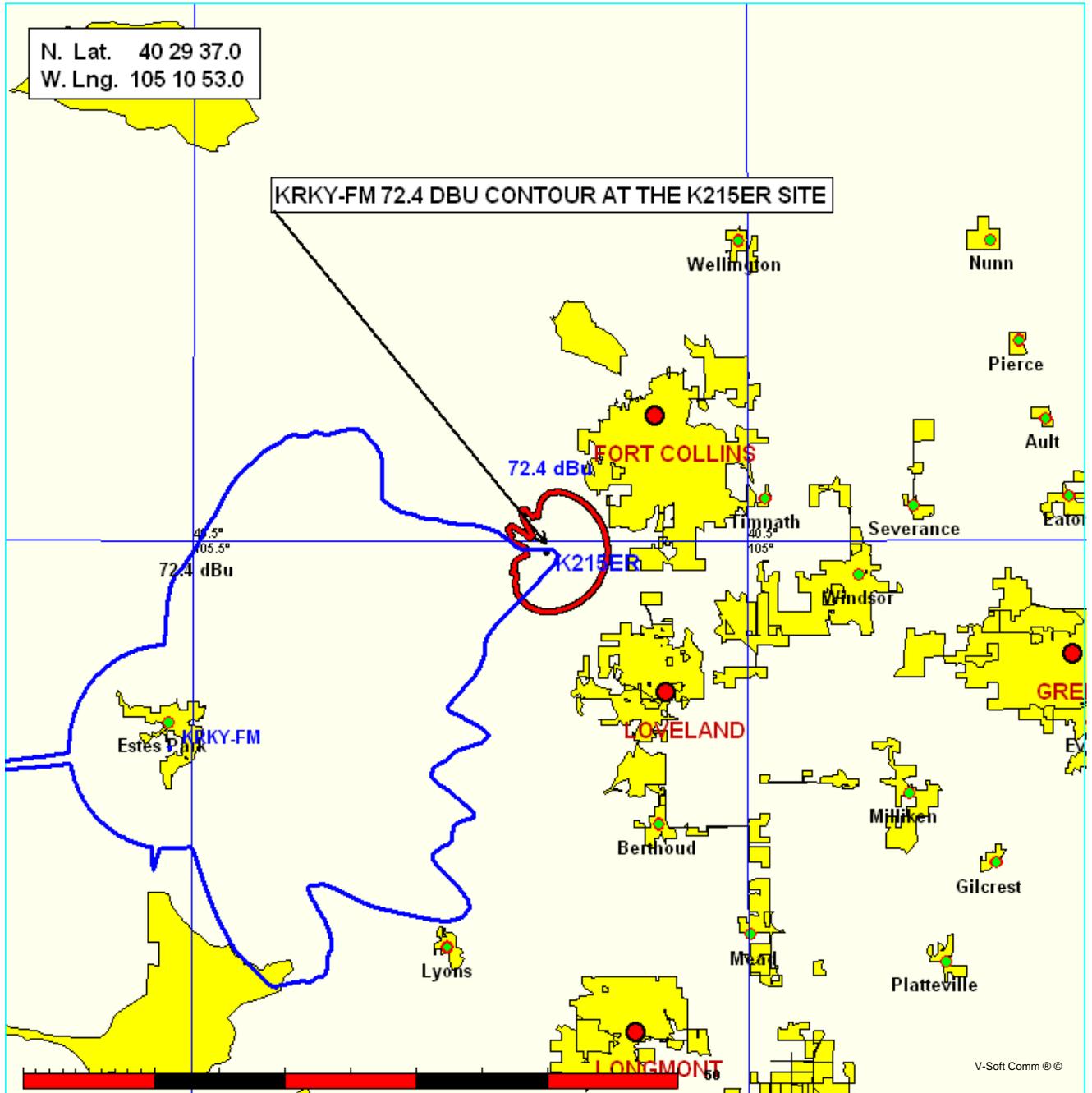


FIGURE 3, 100 DBU PREDICTED CONTOUR
K215ER LOVELAND, COLORADO, CH. 269D

Coverage Study - USGS 03 SEC
08-02-2010

K215ER CH269 D , 0.01 kW, 0.0M HAAT, 2085.0M COR AMSL
Interference Contour = 100 dBu. Population = 0

