

**FM Translator K204BI
Bellingham, Washington Channel 204D
Allocation Study
October 2004**

The attached allocation study maps demonstrate compliance with the Commission's Rules for protection of FM broadcast stations and FM translators as outlined in §74.1204.

Cochannel

With regard to co-channel facilities, the only existing facility close enough to require detailed study is Canadian station CHNW-FM Channel 204LP New Westminster. The attached allocation study map demonstrates that there is no overlap of the proposed 34 dBu F(50,10) contour to the 54 dBu F(50,50) contour of CHNW-FM. (Note that CHNW-FM is a Class LP station according to the Canadian database, equivalent to a domestic Class D or translator station.)

1st Adjacent

With regard to first-adjacent-channel facilities (other than co-owned parent station KPLU-FM), the only existing facilities close enough to require detailed study are Canadian stations and allotments at Chilliwack, Harrison Hot Springs, Surry, and Victoria. The attached allocation study map demonstrates that there is no overlap of the proposed 48 dBu F(50,10) contour to Canadian land areas.

2nd and 3rd Adjacent

With regard to second- and third-adjacent-channel facilities, there is no overlap of the proposed 94 dBu F(50,10) contour to Canadian land areas. Domestically, there is no overlap of the proposed 100 dBu F(50,10) contour to the 60 dBu contour of FM translator K201FH Bellingham, for both the licensed Channel 201 operation and the authorized Channel 202 operation.

The proposed 100 dBu F(50,10) contour is completely encompassed by the licensed and authorized 60 dBu contours of third-adjacent-channel station KUGS Channel 207A Bellingham. However, the same circumstance pertains to the licensed K204BI 100 dBu F(50,10) contour, and the two stations have co-existed with no known interference problems for well over 10 years. The extent of the licensed overlap area (i.e. the area of the licensed 100 dBu F(50,10) contour) is less than 0.5 sq km, as is the extent of the proposed overlap area (0.45 sq km). Therefore, since the extents of both the licensed and proposed overlap areas are less than 0.5 sq km, the existing overlap area is believed to be grandfathered. Waiver of Section 74.1204 of the Commission's Rules with respect to overlap caused to KUGS is respectfully requested to the extent required.





