

San Tan Educational Media
47 CFR 73.870 Waiver Request
Channel 257 Mesa, Arizona
Facility ID: 192016

On February 13th The FCC issued the Call Sign of KUKQ-LP To San Tan Educational Media (STEM). STEM then obtained permission to conduct full power testing immediately at the transmission site. February 14th and 15th STEM did preliminary testing. During this testing STEM had the following results. 4.4 KM to the West at our Studio located at 9333 E Main St #102 Mesa, AZ we could not receive KUKQ-LP on our in studio modulation monitor. We instead received a Mix of KUKQ-LP and KKMR (Channel 293). Attempts included using indoor and outdoor FM antenna and still yielded the mixed reception results. Reception of KKMR Channel 293 at our studio location can be done with no interference from KUKQ-LP (Channel 294). STEM then conducted a test using 10 different car radios. Of that test 6 radios did not receive interference from KKMR. Best performer was a 2008 Hyundai Sonata with a Pioneer avh-p4300dvd. In this Vehicle KUKQ-LP Could be listened to with no interference even if listening until signal faded out completely. Worst Performer was a 2002 Suzuki XL-7 with a Stock Factory Radio. Within 3.9 KM of KUKQ-LP Traveling West the interference began from KKMR. At 5 KM The interference overtook the KUKQ-LP Signal Completely. Traveling East the interference began at 5.2 KM and South began at 4.2 KM. STEM found no issues with 2nd Channel Interference in regards to our Second Channel Waiver. We found no interference from KUKQ-LP towards KKMR in any test.

With the first Channel Interference STEM had an emergency board meeting to discuss our options. Due to the Phoenix Community Radio Application (Facility ID: 194565) which is also on the KKMR channel 293 we can not move the transmitter closer to our studio. Even if we could it would still create first channel interference to our signal on a good percentage of Audio Receivers and with LPFM's Limited Reach as it is, adding additional interference would not make it financially viable. There are no acceptable channel options at our current location. We found one option close to our original application location that may work, but that location would also be on a Second Channel Waiver. That site would require starting from Scratch and would take a while to build out. It is STEM's desire to get our License to Cover as quickly as possible. We looked for a Channel that would NOT require any 2nd Channel Waivers and found one. Channel 257. The Location is on top of Banner Baywood Medical Center. We called Antenna-Sites and they have an immediate opening and we can install in March of 2014 if the FCC grants our Waiver Request. STEM is prepared and ready to implement a quick

install at this NEW location. This location is 9.2 KM from our Construction Permit (CP) issued Site. We request this Waiver to the 5.6 KM Rule for the following reasons. This location while 9.2 KM from the CP Site, it is only 5.4 KM from our Original Application Site. Since KUKQ-LP has not been on the air yet, the listening area has not been established in regards to the listening public and the public's interest. Location is Only 5.4 KM from our Main Studio and Headquarters. KUKQ-LP would not have to operate on a Second Channel Waiver. There are no Broadcast Facilities broadcasting Locally on first channel so interference issue would be resolved. A Waiver to the 47 CFR 73.870 5.6 KM rule would allow STEM to have a quick install and file a license to cover within 60 days. As our exhibit will show. Even with the 9.2 KM move, due to terrain we will still maintain coverage of 35-40% of our CP 60dbu Coverage as that area will reside within the 60dbu coverage area of our new location. The NEW site IS located within the 60dbu contour of the CP site. This Waiver would also allow KUKQ-LP to reach a larger audience in Mesa, AZ the City in which we are Licensed and Dedicated to. We believe as we hope the FCC will also believe that this Channel and Location offers a much more Viable Option for KUKQ-LP and offers the operation of KUKQ-LP with NO Second Channel Waiver. A one time Distance Waiver we believe will serve the public interest better, Offers more flexibility in the future if any encroachment arises. STEM will also point out that our Current Channel (294) does have an established chance of future encroachment if the KDVA reservation for Channel 294 ever gets approved. This Channel move would ensure such a grant would not impact KUKQ-LP in the future. Our in Studio Modulation Monitor and All test Vehicles received NO interference or signals on first channel in respect to channel 257.

STEM is including two graphics to show the New Site is located within the current 60dbu contour and showing distances from Original Site, Current CP site and Studio.

For the reasons stated above, STEM respectfully requests this Waiver to the 47 CFR 73.870 5.6 KM move restriction.

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