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TECH EXHIBIT - REQUEST FOR "MINOR CHANGE" PROCESSING

The within filing is for an applicant whose translator in CO is receiving interference from (and causing some interference to) a cochannel FS Class C1 station (KZNM) in CO whose 2008 license was granted since the translator's 1993 license. Pursuant to this temporal and channel relationship between the facilities and FCC Rule §74.1233(a)(1)(i)(A)(2), it is herewith requested that the application be processed as a minor change in licensed facility. Evidence demonstrating the significant reduction of incoming and outgoing interference from the within proposal follows; please see annotated maps.

The within filing is for a 4th adjacent channel frequency change on the translator from ch 265 to 269. This would provide an improvement to both interference victims of the relationship by changing a cochannel to a 4th adjacent channel relationship.

While this leaves a very small overlap of the translator's 54 dBu F50,10 contour with the FS station's 60 dBu F50, 50, which runs afoul of §73.1204(a)(3), this minor change of output frequency of the translator creates a situation which significantly reduces any actual mutual interference between the two stations or others.

Accordingly, this is a waiver request of §73.1204(a)(3) for this instance together with the application for minor change of the translator frequency. Following is evidence of the significant reduction of mutual interference and interference area with this change.

Environmental representations: The within ap represents no physical change in the installation at the existing site. Given the ERP and the location, NIER from the proposal is below the OET65 limits for its service and power.



J. R. McDonald
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Directory of annotated maps

K265DC. FI 47890, FRN 0006158990

1. Map showing incoming Ix to K265DC on channel 265 as licensed; ~100%.
2. Map showing incoming Ix to K265DC if on channel 269 as requested; < 40%.
- 3-5. Maps showing outgoing interference from K265DC on channel 265...
 3. to KIQX; none.
 4. to KRSJ; none.
 5. to KZNM; 9% = 16,958 viewers.
- 6-8. Maps showing outgoing interference from K265DC if on channel 269...
 6. to KIQX; none.
 7. to KTRA-FM; 0.0% = nominally zero viewers.
 8. to KZNM; none.

Accordingly, it is respectfully requested that a waiver of the 4th adjacent major/minor change policy be regarded pursuant to §74.1233(a)(1)(i)(A)(2).

Thanks very much.

Sincerely,

A handwritten signature in black ink, appearing to read "J. R. McDonald", with a long horizontal flourish extending to the right.

J. R. McDonald
October 7, 2020