

## SECTION 74.1204(d) STUDY

This narrative exhibit demonstrates that the predicted interference to the 60 dBu contour of the second-adjacent KKLZ, Las Vegas, NV and the predicted interference to the 60 dBu contour of the second-adjacent KXPT, Las Vegas, NV is allowable under the rules stated in 47 CFR 74.1204(d).

In support thereof this Applicant states the following:

1. KKLZ, Las Vegas, NV and KXPT, Las Vegas, NV, second adjacent channel facilities to this translator proposal, are protected from interference within their 60 dBu contours from the associated interference contour (based on 47 CFR 74.1204(a)(1); using the FCC F(50/10) curves) which need be 40 dBu greater than the associated coverage contours (KKLZ & KXPT) that would encompass the proposed translator antenna site and that contour which is 40 dBu greater than the associated coverage contour.
2. This translator's antenna location is located within the 60 dBu contour (based on 73.333 F(50/50)) of KKLZ, Las Vegas, NV and within the 60 dBu contour (based on 73.333 F(50/50)) of KXPT, Las Vegas, NV. This proposal will use the predicted desired to undesired coverage method to determine the appropriate interference contour that need be used with regard to KKLZ & KXPT. Included as an attachment (K244EX Las Vegas Desired to Undesired) is a map showing that the 83.8 dBu coverage contours of KXPT encompasses the proposed antenna site along with the entire proposed 123.8 dBu interference contour. The relevant contour for KKLZ is the 91 dBu contour, 40 dbu greater than this is the 131 dBu contour which is much smaller than the 123.8 dBu contour, no further showing is necessary. As the proposed 123.8 dBu interference contour is 40 dBu greater than the 83.8 dBu contour of KXPT then this contour is the

appropriate interference contour for this analysis and it is clearly evident that interference will only occur within this interference contour for this proposed translator.

3. Given this translator's requested effective radiated power of 5 watts, Directional; the predicted 123.8 dBu interference contour for this proposal would be very small. At any HAAT value, the 123.8 dBu contour distance for this proposal is 10 meters at 180 degrees and less in other directions.

4. This proposed translator antenna is to be situated 7 meters above ground on a 14 meter tall Radio tower. Enclosed as K244EX Las Vegas Vertical Freespace, is a study showing the free space signal distance based on the Freespace Equation and factoring in the Vertical Pattern (downward radiation) of the proposed CA-2V Antenna. Based on this study, no part of the 123.8 dBu contour ever reaches the ground level. The rule in 47 CFR 74.1204(d) states "an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such factors as may be applicable." In this particular case, as shown in this exhibit, it is clearly evident that there is a "lack of population" as defined in 47 CFR 1204(d) thus allowing this translator to operate at this proposed location.

For the foregoing reasons this Applicant submits that the predicted interference to KKLZ, Las Vegas, NV and KXPT, Las Vegas, NV is allowable under Section 74.1204(d) of the Commission's rules. Furthermore, grant of this application is in the public interest as it would increase the coverage area of a radio facility in this area and impose no hardship to the referenced facilities, KKLZ, Las Vegas, NV and KXPT, Las Vegas, NV.

By: Kevin Fitzgerald, Technical Consultant