

Waiver Request

K213BP

K213BP was originally licensed on 8/31/1993, and has been serving the cities of Irving and Dallas since that time.

Recently the question of incursion by KTXG, Greenville, TX has arisen. To avoid interference, the facility has been silenced while a suitable approach was developed.

The initial proposal was to seek a minor change. To this end, channels 210, 211, 212, 214, 215, 216, 266 and 267 were examined. All these were considered carefully.

210, 211, and 212 would place the translator in the protected contour of KERA 211C0.

214, 215, and 216 would place the translator in the protected contour of KCBI 215C.

266 and 267 would place the translator in the protected contour of WRR 266C.

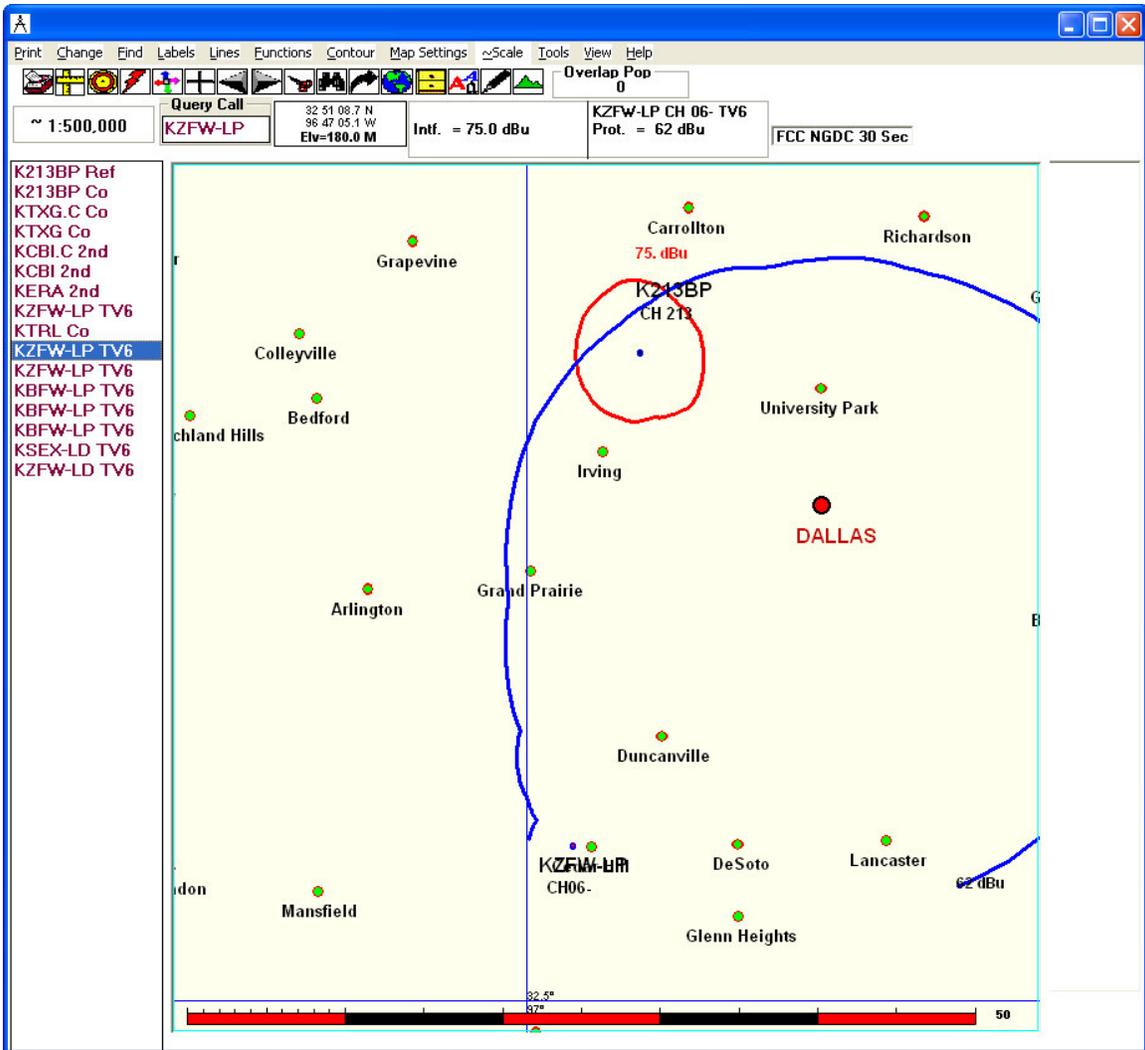
Thus all these options are thus precluded from use.

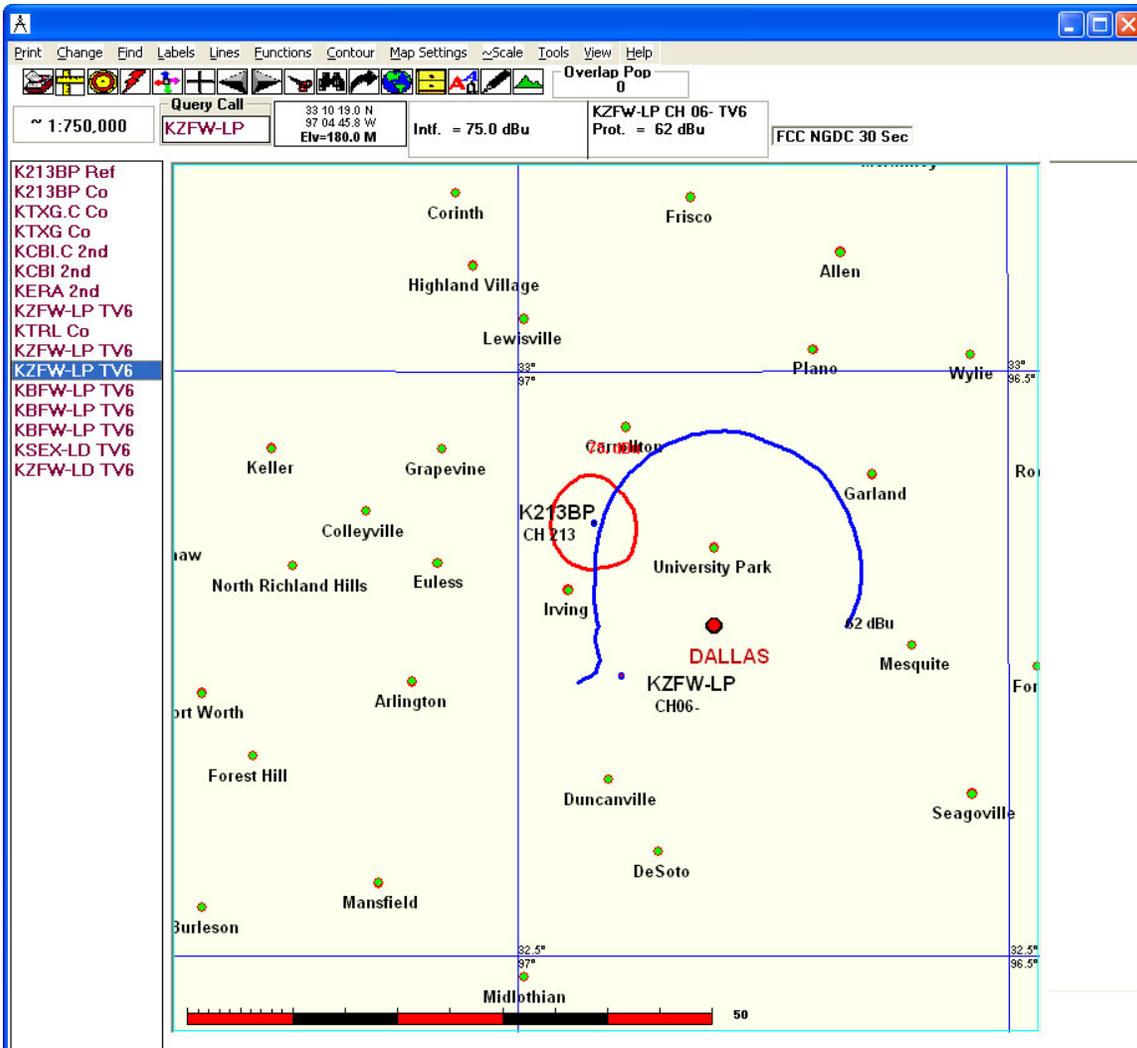
Use of a highly directional antenna in the original channel (213), thus reducing the coverage significantly, was considered.

However, a “flash” move of KZFW-LP, a low power TV station, from channel 69 to channel 6 arose. There are currently three records in the CDBS for KZFW-LP, all of which are short-spaced to our licensed translator K213BP and two of which overlap the licensed facility of our translator.

The screenshot shows the FM Commander software interface with a 'Contour-to-Contour Study' window. The window title is 'FM Commander' and the subtitle is '©V-Soft Communications® Contour-to-Contour Study'. The interface includes a menu bar (File, Print, Settings, Class, Channel, ≤ Down, ≥ Up, Find, Views, Help, About) and a toolbar with various icons. The main display area shows a table of station data. At the top of the table, it indicates 'FCC NGDC 30 Sec' and 'DATA: 01-23-10 - Zone 2'. The table has columns for Call, Type, Ch, Location, Azi, Dist, In, and Out. The data rows are color-coded: K213BP (green), KTXG (red), KCBI (orange), KERA (blue), KZFW-LP (yellow), KTRL (red), KZFW-LP (orange), KZFW-LP (yellow), KBFW-LP (blue), KBFW-LP (blue), KBFW-LP (blue), KSEX-LD (blue), and KZFW-LD (blue). The 'Out' column values are in blue text, while the 'In' column values are in red text. The table ends with 'End of Screen List'.

Call	Type	Ch	Location	Azi	Dist	In	Out
K213BP	LIC	213D	Irving	TX 0.0	0.0	-47.9	-47.9
KTXG	CP-D	213C1	Greenville	TX 44.0	69.0	-87.0*	-21.2
KTXG	LIC	213C1	Greenville	TX 44.0	69.0	-80.5*	-19.7
KCBI	CP	215C	Dallas	TX 187.7	31.6	8.9	-54.8*
KCBI	LIC	215C	Dallas	TX 187.9	31.5	8.5	-54.3*
KERA	LIC	211C0	Dallas	TX 185.0	32.6	10.5	-46.5*
KZFW-LP	AP-D	06 T	Dallas	TX 187.7	31.6	134.5R	-19.2M
KTRL	LIC	213C2	Stephenville	TX 237.6	122.6	-9.7	38.7
KZFW-LP	LI-D	06-T	Dallas	TX 187.7	31.6	134.5R	-9.2M
KZFW-LP	CP-D	06-T	Dallas	TX 169.8	14.6	134.5R	-4.0M
KBFW-LP	CP-D	06 T	Arlington	TX 250.8	40.8	134.5R	4.3M
KBFW-LP	AP-D	06ZT	Arlington	TX 250.8	40.8	134.5R	11.5M
KBFW-LP	LI-D	06ZT	Arlington	TX 250.8	40.8	134.5R	11.5M
KSEX-LD	CP-D	06 D	Dallas	TX 187.7	31.6	134.5R	23.8M
KZFW-LD	CP-D	06 D	Royse City	TX 95.2	33.8	134.5R	26.4M





The incursion of this LPTV has displaced the translator and there is no escape for this translator on any NCE frequency and a major frequency change is necessary to maintain coverage to our listenership.

THUS THIS APPLICATION IS A DISPLACEMENT FILING AND MUST BE TREATED AS A MINOR CHANGE APPLICATION DESPITE THE FACT THAT THE PROPOSED NEW CHANNEL IS MORE THAN THREE CHANNELS AWAY (UP OR DOWN) FROM ITS CURRENT CHANNEL OF OPERATIONS.

THE FCC HAS ALLOWED THIS IN THE PAST, AND THE APPLICANT ASKS FOR SIMILAR TREATMENT HERE. (FOR EXAMPLE, SEE RECENT CONSTRUCTION PERMIT BMPFT-20090519ABU AT MONTGOMERY, ALABAMA.)

THE PUBLIC INTEREST WOULD BE SERVED BY A GRANT OF THIS WAIVER REQUEST AND TREATMENT OF THIS APPLICATION AS A MINOR CHANGE APPLICATION. THIS TRANSLATOR STATION HAS PROVIDED INSPIRATIONAL, EDUCATIONAL AND SPIRITUAL PROGRAMMING TO ITS COMMUNITY OF LICENSE FOR 17 YEARS. THE LOSS OF THIS SERVICE WOULD CREATE AN AVOIDABLE VOID IN THE LIVES OF THOUSANDS OF PEOPLE IN THE IRVING, TEXAS AREA.