

ENGINEERING STATEMENT
“DISPLACEMENT APPLICATION”
FM TRANSLATOR K300AX
FAC Id # 141264
RAPIDS CITY, SOUTH DAKOTA

GENERAL

I have been retained to prepare the required engineering statement for the above-captioned FM translator. Bethesda Christian Broadcasting, licensee of K300AX, proposes to assign the FM translator to Aasen Publishing, Inc., licensee of Radio Station KIMM(AM), Rapids City, South Dakota.¹ The purpose of the proposed “displacement application” is to modify the operating channel from 300D to 294D.² No other changes are proposed in the licensed facilities.

TRANSMITTER LOCATION

The “displaced application” does not propose a change in the current transmitter location. The FCC uniquely describes the license coordinates of K300AX as:

North Latitude 44 degrees 06 minutes 52 seconds

West Longitude 103 degrees 14 minutes 36 seconds

FCC Antenna Registration Number: 1041927

¹ Pursuant to 47 C.F.R. § 73.3517(a), consent has been obtained from Bethesda Christian Broadcasting to file the subject application contingent on the final outcome of the assignment application. *See* attached written consent.

² Translator K300AX will be displaced as the result of a new construction permit issued for Radio Station KXZT, Newell, South Dakota. *See* FCC File No: BMPH-20070502AGV. If the instant “displacement application” is approved on the proposed frequency, it will permit uninterrupted service to Rapid City, SD.

ALLOCATION REVIEW

Translator K300AX currently serves as a Fill-in for FM station KSLT(FM), Spearfish, SD. KSLT(FM) operates on Channel 297, 107.3 MHz. The Fill-in currently operates on Channel 300D with 250 watts at an antenna height above mean seal level of 1222 meters and an antenna height above ground level of 24 meters.³

Translator station K300AX has operated without interference to any existing FM broadcast station or translator. K300AX operates on a third-adjacent channel to station, KSLT(FM), Rapid City, SD.⁴ As the result of numerous channel changes in the region, continued operation of K300AX on Channel 300 will be foreclosed as the result of a new radio station authorized to operate on Channel 300, namely KXZT(FM), CH300C2, Newell, South Dakota.⁵

An FM allocation study was performed to determine available channels which would permit continued operation of K300AX at its current transmitter site. The FM allocation study examined co-channel, adjacent channels (1st, 2nd, and 3rd), and intermediate frequencies (53rd and

³ The translator site is inside the 1 mV/m (60 dBu) contour and does not extend beyond the primary station 1 mV/m contour of KSLT(FM). If the instant application and pending assignment of license is approved, Aasen Publishing, Inc., intends, upon closing of the pending sale, to seek the rebroadcast of KIMM(AM) on K300AX (on the new frequency) either pursuant to an STA or final rule proposed in MB Docket No. 07-172. *See Amendment of Service and Eligibility Rules for FM Broadcast Translator Stations*, Notice of Proposed Rulemaking, MB Docket No. 07-172, FCC No. 07-144 (rel. August 15, 2007) (“*NPRM*”). If rebroadcast of KIMM(AM) is not approved in the short term, Aasen Publishing, Inc., will continue to rebroadcast KSLT(FM). Aasen Publishing, Inc., has obtained the consent to rebroadcast KSLT(FM). *See* BALFT-20090608ABH, Assignment Application K300AX.

⁴ Utilizing a U/D Ratio analysis, K300AX was authorized operation on a third adjacent channel to KSLT(FM), Spearfish, South Dakota. The U/D Ratio interference analysis demonstrated “lack of population” within the predicted interference area to KSLT(FM). *See* Exhibit 12.5, Construction Permit Application, Radio Station KSLT(FM), FCC File No: BNPFT-20030310BME. For over five (5) years, K300AX has operated with no apparent objectionable interference to KSLT(FM).

⁵ To accommodate the KXZT(FM) Channel 300C2 allocation in Newell, South Dakota, the licensed channel of KSLT(FM), Spearfish, South Dakota was modified from Channel 297C to Channel 296C. *See* Construction Permit for KSLT(FM), Spearfish, South Dakota, FCC File No: BPH-20081125AVD.

54th) options. The FM allocation did not find any channels that would fall within adjacent channels; in the instant case, three channels down. *See* attached Engineering Exhibits. Since K300AX is authorized at the top of the FM band, channels above 300 are forbidden. Therefore, non-adjacent channels were explored to determine channel availability. Channel 294D was determined to be the best channel available which would maintain a spectrum *status quo* in the market. Channel 294D will not change the current impact to KSLT(FM); on both its current license Channel 297C and pending Channel 296C construction permit. Channel 294D will remove a conflict with the pending implementation of KXZT(FM), Channel 300C2, Newell, SD.

KSLT currently operates on Ch. 297C with a construction permit to relocate to channel 296C; same site and same ERP. This site is 52.9 km (32.9 miles) northwest of the K300AX site. KSLT also has a booster on channel 297 operating with 2.4 kW located just 2.5 km (1.6 miles) south of K300AX. Assuming KSLT will move its current on-channel booster to Channel 296 after it implements its outstanding construction permit, the proposed Channel 294D translator operations will have no more of an impact on the KSLT operation from that which currently exists.

Both KSLT main transmitter and booster place a 75 dBu contour at the translator site. Utilizing the Undesired-to-Desired ratio of 40 dB, the potential interfering contour is 115 dBu. At 250 watts, the K300AX translator on channel 294D extends approximately 650 feet from the translator. The USGS topographical map provided indicates no population within 650 feet. The site is very remote and the topographical features drop off rapidly.

WAIVER

For the reasons noted above, the proposed displacement application should be granted in order to avoid loss of service. The applicant seeks waiver to move to a non-adjacent channel as a result of no available adjacent channels. Given the fact the current operations are on channel 300

at the top of the FM band, the applicant's channel options are nearly cut in half. No adjacent channels downward are unavailable. Channel 294D serves as the best option at the present transmitter site and maintains a spectrum *status quo* within the market. In all other respects, the application satisfies the FCC's Rules and Regulations.

This statement and attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: June 2, 2009

signed
Edward P. De La Hunt