

Engineering Statement Regarding Second &/or Third Adjacent Channel Interference With Additional Comments regarding Co-Channel Interference

This application proposes an FM translator that will, according to the FCC Rules cause interference to facilities on either or both of the second or third adjacent channels in the area immediately surrounding the proposed FMT site.

In this case, KATC and KILO are thus affected. In both cases, the applicant will demonstrate with map diagrams and/or text descriptions that demonstrate that the interference, while predicted, will not cause actual interference.

KATC has a signal in the area of the proposed FMT of 99.1 dBu. Thus using the well established principles of Undesirable/Desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules, the proposed 139.1 dBu interference contour would be the area of possible interference. That area extends 0.6 meters from the proposed FMT site, and that area is fenced off, unpopulated and uninhabited.

Similarly KILO has a signal in the area of the proposed FMT of 99.5 dBu, and as outlined above, the area affected by the proposed FMT (139.5 dBu interference contour) would be uninhabited and unpopulated.

The applicant hereby requests a waiver of section 73.1204 of the rules based on paragraph 73.1204(d) of the rules, in that the proposed or possible areas of interference are uninhabited and/or unpopulated and thus will there not be caused any actual interference.

Further, the applicant hereby requests that the Commission allow the applicant to calculate and demonstrate the area of interference using the well established principles of undesirable to desirable signal ratio of 40 dBu, as outlined in section 73.215(2) of the rules.

In making these requests, the applicant submits that by granting them, the Commission would allow additional service that would otherwise not be permitted, and that are in conformity with the Commission's rules. The public interest would thus be served.

Educational Communications Of Colorado Springs, Inc.

Minor Modification K234AJ

REFERENCE
38 53 10.0 N.
104 53 24.0 W.

CH# 234D - 94.7 MHz, Pwr= 0.019 kW, HAAT= 0.0 M, COR= 2213 M
Average Protected F(50-50)= 3.69 km
Omni-directional

DISPLAY DATES
DATA 08-28-10
SEARCH 08-29-10

CH CITY	CALL	TYPE STATE	ANT AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
234D	K234AJ	LIC _C_	0.0	0.0	38 53 10.0	0.083	17.6	5.4	-21.3*<	-17.2*<
Colorado Springs		CO	0.0	BLFT20100802AJT	104 53 24.0		2213	Educational Communications		
232C	KILO	LIC _C_	171.1	15.8	38 44 44.0	79.000	15.8	100.8	-5.6*<	-85.3*<
Colorado Springs		CO	351.1	BLH20070426AAL	104 51 42.0	670	2922	Colorado Springs Radio Bro		
236C	KATC-FM	LIC _C_	170.8	15.8	38 44 43.0	72.000	15.4	100.3	-5.4<	-84.8*<
Colorado Springs		CO	350.8	BLH20060622ABT	104 51 39.0	695	2946	Radio License Holding Cbc,		
234C	KRKS-FM	LIC DCN	343.3	137.6	40 04 19.0	100.000	180.3	77.8	-46.4*<	48.0
Lafayette		CO	163.1	BMLH19981009KC	105 21 14.0	300	2442	Salem Media Of Colorado, I		
To Channel 234C, Lafayette,		CO per	D96-64							
234C3	KFVR-FM	CP _CX	182.9	112.1	37 52 40.0	18.000	129.2	53.2	-20.8*<	47.0
Beulah		CO	2.9	BPH20080311ACG	104 57 19.0	118	2426	Greel ey Broadcasti ng Corpo		
234C1	KFVR-FM	LIC _CX	137.2	184.7	37 39 31.0	100.000	159.8	62.2	11.6	77.7
La Junta		CO	318.1	BLH20071220ABH	103 27 55.0	156	1546	Greel ey Broadcasti ng Corpo		

Terrain database is NGDC 30 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
Contour distances are on direct line to and from reference station. Reference zone = 2, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
""affixed to 'IN' or 'OUT' values = site inside protected contour.

Terrain and Contour Study

N. Lat. = 38 53 10 W. Lng. = 104 53 24

HAAT and Distance to Contour - FCC Method - 30 Arc. Sec.

Minor Change to K234AJ

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	2187.4	25.6	0.0190	-17.21	1.000	3.69
030	2011.7	201.3	0.0190	-17.21	1.000	9.76
060	1998.6	214.4	0.0190	-17.21	1.000	10.07
090	1951.1	261.9	0.0190	-17.21	1.000	11.11
120	1869.0	344.0	0.0190	-17.21	1.000	12.70
150	1844.2	368.8	0.0190	-17.21	1.000	13.13
180	2186.4	26.6	0.0190	-17.21	1.000	3.69
210	2795.3	-582.3	0.0190	-17.21	1.000	3.69
240	2934.6	-721.6	0.0190	-17.21	1.000	3.69
270	2743.9	-530.9	0.0190	-17.21	1.000	3.69
300	2573.6	-360.6	0.0190	-17.21	1.000	3.69
330	2677.5	-464.5	0.0190	-17.21	1.000	3.69

Ave El= 2314.44 M HAAT= -101.44 M AMSL= 2213

Minor Change to K234AJ

FMCONT Allocation Study

07-02-2006

K234AJ CH 234 D
.019 kW 2213M COR
Prot. = 60 dBu
Intef. = 40 dBu

KRKSFM CH 234 C
100kW, 2442 M COR DA
Prot. = 60 dBu
Intef. = 40 dBu
File # BMLH19981009KC

1: 3, 351, 563

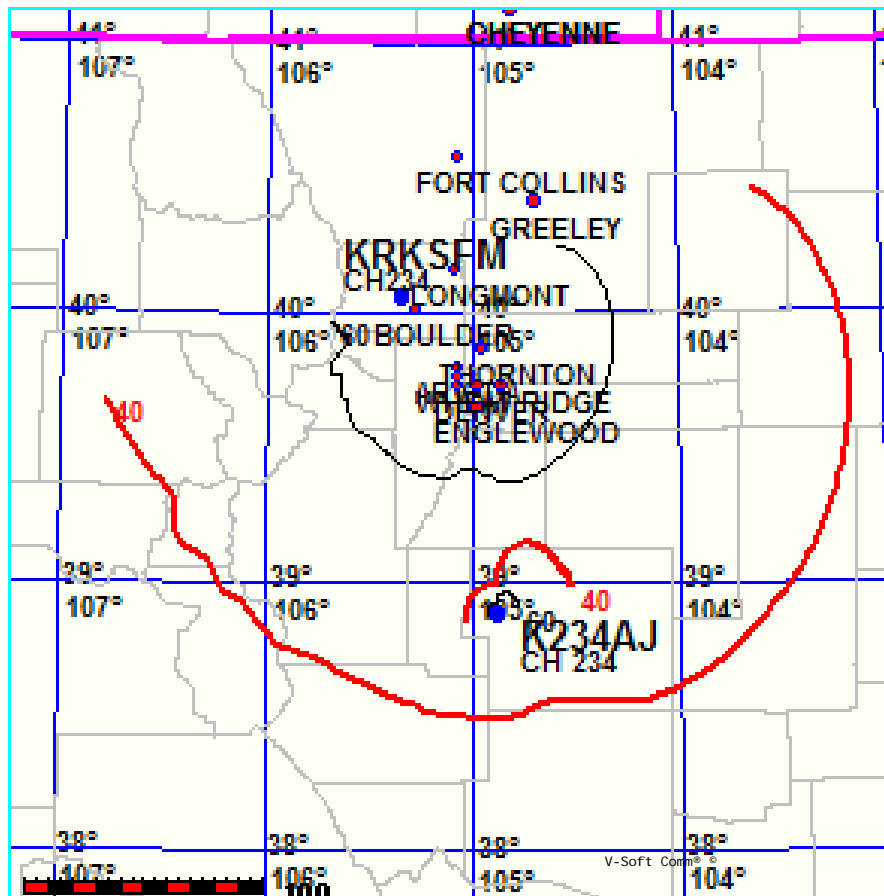


EXHIBIT 12b

Demonstration of No Population in 100 dBu Interference Contour

