

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 CH# 234D - 94.7 MHz, Pwr= 0.019 kW, HAAT= 0.0 M, COR= 2213 M
 38 53 10.0 N. Average Protected F(50-50)= 3.69 km
 104 53 24.0 W. 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 Colorado Springs	K234AJ	LIC _C_ CO	0.0 0.0	0.0 BLFT20100802AJT	38 53 10.0 104 53 24.0	0.083 2213	17.6 2213	5.4 Educational	-21.3*<	-17.2*<
232C Colorado Springs	KILO	LIC _C_ CO	171.1 351.1	15.8 BLH20070426AAL	38 44 44.0 104 51 42.0	79.000 670	15.8 2922	100.8 Colorado Springs	-5.6*<	-85.3*<
236C Colorado Springs	KATC-FM	LIC _C_ CO	170.8 350.8	15.8 BLH20060622ABT	38 44 43.0 104 51 39.0	72.000 695	15.4 2946	100.3 Radio License Holding Cbc,	-5.4<	-84.8*<
234C Lafayette To Channel 234C, Lafayette,	KRKS-FM	LIC DCN CO	343.3 163.1	137.6 BMLH19981009KC	40 04 19.0 105 21 14.0	100.000 300	180.3 2442	77.8 Sal em Media Of Colorado, I	-46.4*<	48.0
234C3 Beulah	KFVR-FM	CP _CX CO	182.9 2.9	112.1 BPH20080311ACG	37 52 40.0 104 57 19.0	18.000 118	129.2 2426	53.2 Greel ey Broadcasti ng Corpo	-20.8*<	47.0
234C1 La Junta	KFVR-FM	LIC _CX CO	137.2 318.1	184.7 BLH20071220ABH	37 39 31.0 103 27 55.0	100.000 156	159.8 1546	62.2 Greel ey Broadcasti ng Corpo	11.6	77.7

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

FMCNT 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

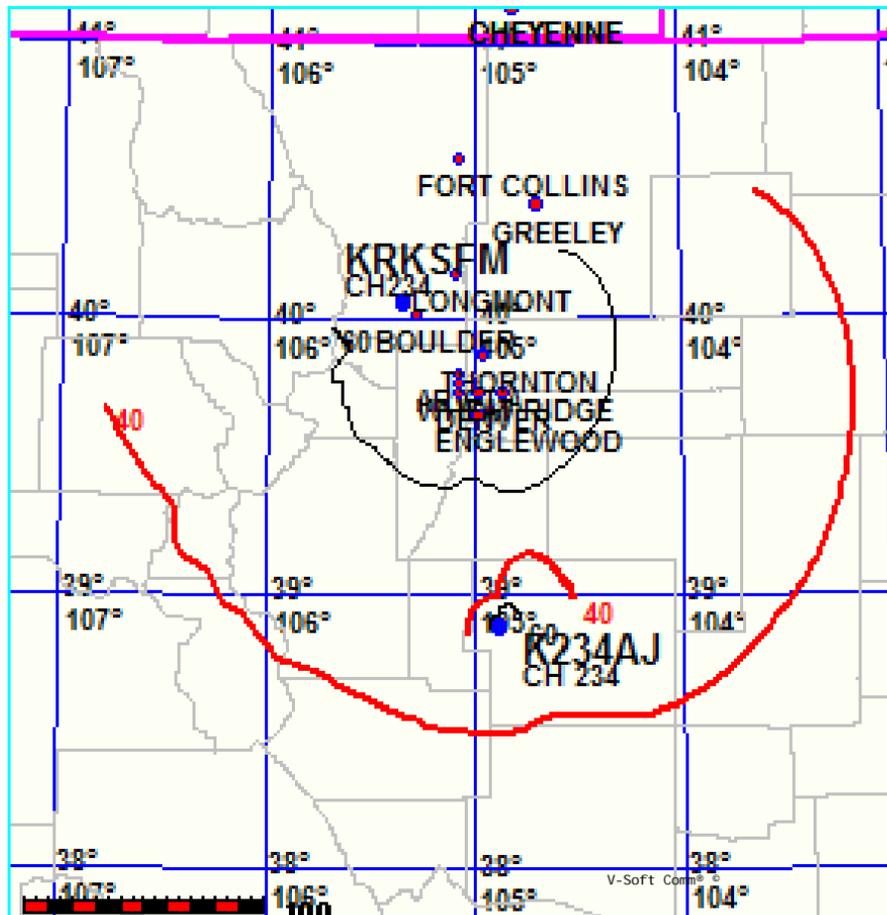


EXHIBIT 12b

Demonstration of No Population in 100 dBu Interference Contour

