

December 2012
KANY(FM) Channel 229C0
Montesano, Washington
Allocation Study

Background

The instant application is part of a contingent application group which includes the following three elements:

- a) A Form 301 application proposing modification of KANY on Channel 229C0 at Montesano, Washington, to remove a §73.215 protection requirement to KXAA on Channel 229A at Cle Elum, and thus eliminate a null in the KANY directional antenna pattern;
- b) In order to accommodate the KANY modification, a request that the FCC modify the license for KXAA to specify operation on Channel 262A at Cle Elum, and;
- c) In order to accommodate the KXAA modification, a Form 301 application proposing “one step” modification of KWIQ-FM to operate on Channel 263C2 at Moses Lake.

The licensees of KANY and KWIQ-FM have entered into a written agreement to jointly prosecute their Form 301 applications.

Domestic Spacing Study

The attached spacing study shows that the proposed operation meets the domestic co-channel and adjacent channel spacing requirements for Class C0 stations as prescribed in §73.207 of the Commission's Rules, with the exception of a short-spacing to the licensed operation of KXAA on Channel 229A at Cle Elum.

Provided that KWIQ-FM is modified to specify operation on Channel 263C2 (as is requested in the simultaneously-filed contingent application by that station's licensee), then Channel 262A can be substituted for Channel 229A at Cle Elum, for use by KXAA at its licensed transmitter site. JOSH Broadcasting respectfully requests that the Commission issue a letter directing the KXAA licensee to show cause why the KXAA license should not be modified to specify operation on Channel 262A at Cle Elum. A spacing study is included to demonstrate that Channel 262A meets the co-channel and adjacent channel spacing requirements for Class A stations at the licensed KXAA transmitter site coordinates.

JOSH Broadcasting pledges to reimburse Wheeler Broadcasting, Inc., the licensee of KXAA, for its reasonable and prudent expenses in connection with the foregoing channel change, as required by *Circleville, Ohio*, 8 FCC Rcd 159 (1967).

Canadian Stations and Allotments

The proposed KANY facility is short-spaced to Canadian station CJJR-FM, which operates on Channel 229C at Vancouver, British Columbia. Under the terms of the *Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service*, as amended in 1997 ("*Working Arrangement*"), the required co-channel Class C to Class C spacing¹ is 306 kilometers, whereas the distance between the proposed allotment site and the CJJR-FM transmitter site is 250 kilometers.

The proposed KANY facility is also short-spaced to a vacant Canadian allotment on Channel 230A at Port Renfrew, British Columbia. Under the terms of the *Working Arrangement*, the required first-adjacent-channel Class C to Class A spacing² is 182 kilometers, whereas the distance between the proposed allotment site and the Port Renfrew 230A allotment site is 164 kilometers.

The attached allocation study exhibit "KANY 229C0 Canada Allocation Study Map" demonstrates that the proposed KANY 38 dBu F(50,10) contour will not overlap the protected service area of CJJR-FM (97 km radius) over Canadian land areas, nor will the proposed KANY 52 dBu F(50,10) contour overlap the protected service area of Port Renfrew 230A (38 km radius) over Canadian land areas.

¹ The *Working Arrangement* does not include the U.S. Class C0, and so the Class C spacing requirement set forth in Section 2.4 pertains.

² The *Working Arrangement* does not include the U.S. Class C0, and so the Class C spacing requirement set forth in Section 2.4 pertains.

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SEARCH PARAMETERS

FM Database Date: 121211

Channel: 229C0 93.7 MHz

Page 1

Latitude: 47 18 46

Longitude: 123 22 15

Safety Zone: 32 km

Job Title: KANY 229C0 MONTESANO

| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|---|---------------------|----------------|------------------|--------------------|-----------------------|---------------------|------------------|--------------|
| K226AN LIC | MONTESANO WA | BLFT-50513ABT | 226D 93.1 | 0.250 145.0 | 46-57-31 123-35-18 | 202.8 | 42.69 0.00 | 0 TRANS |
| KUBEaux LIC | SEATTLE WA | BLH-831110AF | 227C0 93.3 | 87.000 375.0 | 47-32-39 122-06-29 | 74.4 | 98.69 0.00 | 0 AUX |
| KUBEaux LIC | SEATTLE WA | BXLH-20416AAH | 227C0 93.3 | 22.000 368.0 | 47-32-40 122-06-26 | 74.4 | 98.75 0.00 | 0 AUX |
| KUBE LIC | SEATTLE WA | BLH-10206AAA | 227C0 93.3 | 100.000 387.0 | 47-32-40 122-06-26 | 74.4 | 98.75 2.75 | 96 CLOSE |
| VAC | MANZANITA OR | RM-10668 | 228C3 93.5 | 0.000 0.0 | 45-41-05 123-54-38 | 193.1 | 185.66 22.66 | 163 CLEAR |
| DEL | MANZANITA OR | RM-11631 | 228C3 93.5 | 0.000 0.0 | 45-41-05 123-54-38 | 193.1 | 185.66 22.66 | 163 CLEAR |
| CJJRFM | VANCOUVER BC | - | 229C 93.7 | 75.000 686.0 | 49-21-29 122-57-09 | 7.6 | 229.53 -76.47 | 306 SHORT |
| K229BP LIC | AUBURN WA | BLFT-10712ACH | 229D 93.7 | 0.090 -7.0 | 47-18-17 122-14-41 | 90.2 | 85.16 0.00 | 0 TRANS |
| KXAA LIC | CLE ELUM WA | BLH-21114AAA | 229A 93.7 | 6.000 29.0 | 47-09-06 120-47-23 | 94.3 | 196.28 -18.72 | 215 SHORT |
| NOTE: TO CHANNEL 262A PER THIS PROPOSAL | | | | | | | | |
| K229BL LIC | GIG HARBOR WA | BLFT-70313ABC | 229D 93.7 | 0.058 121.0 | 47-20-19 122-36-06 | 86.9 | 58.22 0.00 | 0 TRANS |
| NEW-T APP | INDEPENDENCE WA | BNPFT-30310BNG | 229D 93.7 | 0.150 4.0 | 46-48-58 123-09-24 | 163.6 | 57.56 0.00 | 0 TRANS |
| NEW-T APP | MERCER ISLAND WA | BNPFT-30310ASK | 229D 93.7 | 0.010 224.0 | 47-36-57 122-18-26 | 66.8 | 86.98 0.00 | 0 TRANS |
| KANY CP | MONTESANO WA | BPH-80710AJA | 229C0 93.7 | 33.000 677.0 | 47-18-46 123-22-15 | 0.0 SS | 0.00 -270.00 | 270 SHORT |
| KANY LIC | OCEAN SHORES WA | BLH-80304ABF | 229C3 93.7 | 14.000 122.0 | 46-56-00 123-43-57 | 213.1 SS | 50.33 -175.67 | 226 SHORT |

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SEARCH PARAMETERS                               FM Database Date: 121211
Channel: 229C0 93.7 MHz                        Page 2
Latitude: 47 18 46
Longitude: 123 22 15
Safety Zone: 32 km
Job Title: KANY 229C0 MONTESANO
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| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|----------------|--------------------|----------------|------------------|--------------------|-----------------------|---------------------|------------------|--------------|
| K229AD LIC | YAKIMA WA | BLFT-30815ADU | 229D 93.7 | 0.035 0.0 | 46-37-49 120-32-01 | 108.4 | 228.85 0.00 | 0 TRANS |
| | PORT RENFREW BC | - | 230A 93.9 | 0.000 0.0 | 48-32-48 124-24-10 | 331.1 | 157.38 -24.62 | 182 SHORT |
| KPDQ-FM LIC | PORTLAND OR | BLH-60208AMF | 230C1 93.9 | 52.000 387.0 | 45-29-20 122-41-40 | 165.4 SS | 209.31 13.31 | 196 CLEAR |
| KMPS-FM LIC | SEATTLE WA | BLH-01023AEZ | 231C 94.1 | 73.000 698.0 | 47-30-17 121-58-04 | 78.1 | 108.03 3.03 | 105 CLOSE |
| KMPSaux LIC | SEATTLE WA | BXLH-60530AHC | 231C 94.1 | 53.000 371.0 | 47-32-37 122-06-35 | 74.4 | 98.55 0.00 | 0 AUX |
| KYAB-LP LIC | ABERDEEN WA | BLL-60628ACS | 232L1 94.3 | 0.100 -33.6 | 46-58-32 123-50-01 | 223.2 | 51.36 0.00 | 0 LPFM |
| NEW-T APP | ABERDEEN WA | BNPFT-30317GYC | 282D 104.3 | 0.075 202.0 | 46-55-53 123-44-02 | 213.1 | 50.56 0.00 | 0 TRANS |

===== END OF FM SPACING STUDY FOR CHANNEL 229 =====

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SEARCH PARAMETERS FM Database Date: 121211
Page 1Channel: 262A 100.3 MHz
Latitude: 47 9 6
Longitude: 120 47 23
Safety Zone: 32 km
Job Title: KXAA 262A CLE ELUM

| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|--|---------------------|----------------|------------------|--------------------|--------------------------|---------------------|-------------------|--------------|
| K260BE LIC | ICICLE CREEK WA | BLFT-51013AAB | 260D 99.9 | 0.250 16.0 | DA 47-33-55 120-40-52 | 10.0 | 46.71 0.00 | 0 TRANS |
| KISW LIC | SEATTLE WA | BLH-80730AKM | 260C 99.9 | 68.000 707.0 | DA 47-30-14 121-58-29 | 294.1 SS | 97.76 2.76 | 95 CLOSE |
| KISWaux LIC | SEATTLE WA | BXLH-01018ACN | 260C 99.9 | 50.000 388.0 | DA 47-32-35 122-06-25 | 294.2 | 108.63 0.00 | 0 AUX |
| NEW | VICTORIA BC | - | 262C 100.3 | 100.000 494.0 | DA 48-35-41 123-32-37 | 309.0 | 261.13 14.13 | 247 CLEAR |
| NEW | VICTORIA BC | - | 262C 100.3 | 0.000 0.0 | 48-35-41 123-32-37 | 309.0 | 261.13 14.13 | 247 CLEAR |
| KKRZ LIC | PORTLAND OR | BLH-11214AAE | 262C 100.3 | 100.000 470.0 | 45-31-21 122-44-45 | 220.4 | 235.54 9.54 | 226 CLOSE |
| KKRZaux LIC | PORTLAND OR | BXLH-30617ABD | 262C 100.3 | 40.000 409.0 | 45-31-21 122-44-46 | 220.4 | 235.55 0.00 | 0 AUX |
| NEW-T APP | MERCER ISLAND WA | BNPFT-30311ARG | 262D 100.3 | 0.010 224.0 | 47-36-57 122-18-26 | 294.9 | 125.67 0.00 | 0 TRANS |
| RSV | MOSES LAKE WA | RM-9269 | 262C 100.3 | 0.000 0.0 | 47-29-20 119-26-45 | 69.2 | 108.30 -117.70 | 226 SHORT |
| KWIQ-FM LIC | MOSES LAKE WA | BLH-50927ACN | 262C1 100.3 | 100.000 51.0 | 47-06-09 119-14-26 | 92.1 | 117.67 -82.33 | 200 SHORT |
| NOTE: TO CHANNEL 263C2 PER SIMULTANEOUSLY-FILED CONTINGENT APPLICATION | | | | | | | | |
| KWIQaux APP | MOSES LAKE WA | BXPH-21205AEL | 262C1 100.3 | 0.690 41.0 | 47-09-48 119-21-37 | 88.8 | 108.41 0.00 | 0 AUX |
| NEW-T APP | NEWCASTLE WA | BNPFT-30317ACC | 262D 100.3 | 0.015 411.0 | 47-32-31 122-06-28 | 294.1 | 108.64 0.00 | 0 TRANS |
| NEW-T APP | ORTING WA | BNPFT-30310ASW | 262D 100.3 | 0.010 517.0 | 47-02-52 122-08-33 | 264.1 | 103.35 0.00 | 0 TRANS |
| NEW-T APP | SEATTLE WA | BNPFT-30317KJA | 262D 100.3 | 0.028 292.0 | 47-36-57 122-18-26 | 294.9 | 125.67 0.00 | 0 TRANS |

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SEARCH PARAMETERS                               FM Database Date: 121211
Channel: 262A    100.3 MHz                      Page    2
Latitude:  47  9  6
Longitude: 120 47 23
Safety Zone:  32 km
Job Title: KXAA 262A CLE ELUM

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| Call Status | City St | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-True | Dist (km) | Req (km) |
|----------------|-----------------|----------------|------------------|--------------------|--------------------------|---------------------|----------------|-------------|
| NEW-T APP | TACOMA WA | BNPFT-30317KIH | 262D 100.3 | 0.250 7.0 | 47-12-26 122-19-26 | 273.6 | 116.46 0.00 | 0 TRANS |
| KKWFaux LIC | SEATTLE WA | BXLH-10327AAL | 264C 100.7 | 50.000 388.0 | DA 47-32-35 122-06-25 | 294.2 | 108.63 0.00 | 0 AUX |
| KKWF LIC | SEATTLE WA | BLH-81120AFT | 264C 100.7 | 68.000 707.0 | DA 47-30-14 121-58-29 | 294.1 | 97.76 2.76 | 95 CLOSE |
| K264BF LIC | WENATCHEE WA | BLFT-10620AAE | 264D 100.7 | 0.010 877.0 | 47-19-10 120-14-17 | 65.7 | 45.75 0.00 | 0 TRANS |

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

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|----------------|--------------------|--|----------------|--------------|-----------------------|------|-----------------|--------------|
| KXAA ALC | CLE ELUM WA - | | 262A 100.3 | 0.000 0.0 | 47-09-06 120-47-23 | 0.0 | 0.00 -115.00 | 115 SHORT |
| KWIQ-FM ALC | MOSES LAKE WA - | | 263C2 100.5 | 0.000 0.0 | 47-06-09 119-14-24 | 92.1 | 117.72 11.72 | 106 CLEAR |

===== END OF FM SPACING STUDY FOR CHANNEL 262 =====

