

Exhibit 17
KYVT Minor Modification
Prohibited Contour Overlap
Analysis and Request for Waiver
Yakima School District No. 7

Yakima School District No. 7 (“YSD”) proposes to provide better public service from its facility KYVT (Facility ID 74320) through an increase of effective radiated power. The Commission has previously granted waivers 47 CFR §73.509(a) for 2nd adjacent overlap¹ between KYVT and KYTR (Facility ID 175692). These waivers allow potential interference in small areas near the respective transmitter sites of these two facilities.

YSD respectfully requests modifications of the granted waiver in seeking this increase in effective radiated power.

The 60 dB μ (50,50) protected contour of KYVT presently encompasses 973 km², while the upgraded KYVT would cover 2093 km², an increase of 115%, more than doubling the area served. Population served would increase from 159,318 to 187,451. This is an increase of 28,133 persons served, or an additional 17.6%. The upgraded service area would include many underserved rural areas as well.

Contour overlap of KYVT’s 100 dB μ (50,10) interfering contour within KYTR’s 60 dB μ (50,50) contour would increase from 2.1 km² to 6.8 km². The expanded overlap would cover 2.8% of KYTR’s protected contour area. Persons within the interfering contour would increase from the present 11 to 295. All population that is within the proposed KYVT interfering contour is located to the north of the ridge where KYVT’s facility is located and is approximately 12 degrees below the main lobe of the elevation pattern of KYVT’s antenna. This will reduce the amount of interfering signal received by this population within the 100 dB μ contour.

Figure 17-1 shows the protected contours of the respective facilities, including both the present and proposed coverage areas for KYVT. Figure 17-2 illustrates the interfering contours of KYTR and the proposed KYVT facility. Note that a portion of the KYVT interfering contour lies outside of the KYTR protected contour.

¹ Waivers are documented on the current authorizations for KYVT (file number BLED-20131107ABE) and KYTR (file number BLED-20180502ABT). Specifically, KYTR’s license states “Future modification of KYVT(FM), Facility ID No.74320, Yakima , WA, will not be construed as per se modifications of KYTR(FM) construction permit BPED-20141222AFU.”

The applicant acknowledges that any future modifications to KYTR that increase the prohibited overlap received by KYVT would not be construed as a modification of KYVT's authorization and that any construction permit granted to KYVT in response to this application will include a special operating condition specifying the same.



