



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
FM TRANSLATOR STATION
K257CD, PHOENIX AND GLENDALE, ARIZONA
FACILITY ID: 38482**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Michael Piazza, LLC, licensee of FM translator Station K257CD, Phoenix and Glendale, Arizona ("Station"), to prepare this material in support of an application for minor change of the Station's license. A copy of the Station's current broadcast license, FCC File No. BLFT-850107TA, dated January 18, 1985, and corrected on April 19, 1985, is attached as Exhibit A.

The Station's license contains the incorrect geographical coordinates and transmitting antenna location description. Also, the Station's license contains the correct transmitting antenna description, but the Commission's current consolidated database entry contains incorrect antenna data. No physical changes are proposed in the existing K257CD technical facility. Rather, this application is filed to simply correct longstanding errors in the Station's authorization.

Transmitter Site Location

The Station is presently operating and has operated for 24 years at the exact transmitter site proposed in its original application for construction permit and at the precise ground elevation and antenna height above mean sea level authorized in the Station's 1984 construction permit and the covering 1985 broadcast license.

Unfortunately, as demonstrated below, an error in the geographical coordinates of the transmitter site was made in the original construction permit application and has been carried forth for the past 24 years. The 1984 application for construction permit, prepared by the original permittee/licensee of the Station, Louis B. Burke, Jr., clearly proposes use of an existing tower, "Atop of Shaw Butte, Phoenix Mtns. Preserve" (See Exhibit B). Also, the transmitter site map included in the 1984 application as Exhibit 200 (and attached hereto as Exhibit C), clearly specifies the existing radio tower atop Shaw Butte as the 'proposed translator site'. However, the geographical location of the site marked as the proposed transmitter site in Exhibit 200 was determined to be 33-35-38 N.L. and 112-05-10 W.L. It is unclear as to why this site was labeled 33-35-54 N.L. and 112-05-13 W.L. in the 1984 application for construction permit.

Discrepancies such as this are routinely noted by both the FCC processing engineer and by the person who prepared the technical portion of the application. A corrective amendment should have been requested and should have been filed. Unfortunately, in this instance, the amendment was never requested and never filed. As a result, the incorrect coordinates have been carried forth to this date.

STATEMENT OF WILLIAM J. GETZ
PAGE 3

Further, Exhibit D is a topographic map which shows both the correct site location and the incorrect site location. As discussed above, the Station was both proposed and built atop Shaw Butte at the location of an existing radio tower at a ground elevation of 2,129 feet above mean sea level. The tower sketch included in the 1984 application (and attached hereto as Exhibit E) shows the 2,129 foot ground elevation at the top of Shaw Butte, not the site at a lower location on the mountain at an elevation of 1,580 feet above mean sea level.

The following table illustrates that there exists a simple coordinate discrepancy on the Station's authorization:

	<u>CP/LIC</u>	<u>AS BUILT</u>
<i>Ground Elevation</i>	<i>2,129 ft. (649 m)</i>	<i>2,129 ft. (649 m)</i>
<i>Antenna Height Above Ground Level</i>	<i>40 ft. (12 m)</i>	<i>40 ft. (12 m)</i>
<i>Antenna Height Above Mean Sea Level</i>	<i>2,169 ft. (661 m)</i>	<i>2,169 ft. (661 m)</i>
<i>Transmitter Location Description</i>	<i>Atop Shaw Butte</i>	<i>Atop Shaw Butte</i>
<i>Mapped Transmitter Location</i>	<i>Radio Tower Atop Shaw Butte</i>	<i>Radio Tower Atop Shaw Butte</i>
<i>Geographical Coordinates from Body of FCC Application</i>	<i>33-35-38 N.L. 112-05-10 W.L.</i>	<i>33-35-38 N.L. 112-05-10 W.L.</i>
<i>Geographical Coordinates from FCC Form</i>	<i>33-35-54 N.L. 112-05-13 W.L.</i>	<i>33-35-38 N.L. 112-05-10 W.L.</i>

This application seeks a minor change of the Station's license to correct the longstanding error in the Station's authorization.

Transmitting Antenna Location Description

According to the Exhibit A (the current K257CD FCC license), the transmitting antenna location is described as, "1034 W. Sunnyside Drive, Phoenix, AZ". This address is not a correct description of the Station's transmitting antenna location. The address shown on the attached Exhibit F (FCC Form 346, Question 2, as amended December, 1984) is as follows:

1034 W. Sunny Side Dr.
Atop of Shaw Butte, Phoenix
Mtns. Preserve

The FCC authorization contains only the first line of the transmitting antenna location listed above. Unfortunately, the first line is in error and the rest of the description is correct. Although current FM translator broadcast licenses do not show a transmitter antenna location description, this material corrects the transmitting antenna location description to the extent necessary.

Transmitting Antenna

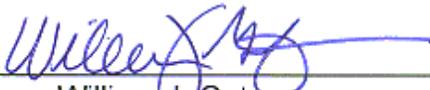
As shown on Exhibit A and Exhibit F, the Station operates with a Scala HDCA-10EB directional antenna array with the main lobes oriented at 0, 180 and 270 degrees true. The current CDBS database record for the Station shows a nondirectional operation. This material also corrects this discrepancy.

STATEMENT OF WILLIAM J. GETZ
PAGE 5

Summary

No physical changes in the present K257CD technical facility are proposed herein. Upon grant of the instant minor change application, the applicant will promptly file an application for license (FCC Form 350) to cover the corrected construction permit and cause the issuance of a corrected broadcast license for K257CD. This statement has been prepared by me or under my direct supervision and is believed to be true and correct.

DATED: December 9, 2008



William J. Getz

United States of America
Federal Communications Commission

File No.: BLFT-850107TA

FM License For a
Broadcast Translator Station

Call Sign: K257CD

Subject to the provisions of the Communications Act of 1934, subsequent acts, and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus hereinafter described.

- 1. Name of Licensee LOUIS B. BURKE, JR.
- 2. License term ending 3 a.m. Local Time DECEMBER 1, 1989
- 3. Principal community to be served PHOENIX AND GLENDALE, AZ
- 4. Primary station KSTM-FM, CH-296, APACHE JUNCTION, AZ
- 5. Via DIRECT
- 6. Operating assignment Channel #257A, 99.3 MHz
- 7. Hours of operation Unlimited.
- 8. Transmitter MCMARTIN BFM-8000 + TEPKO J-319-10 AMPLIFIER
- 9. Transmitter power output 10 watts EACH OUTPUT
- 10. Transmitting antenna location 1034 W. SUNNYSIDE DRIVE,
PHOENIX, AZ
- 11. North Latitude 33° 35' 54"
- West Longitude 112° 05' 13"
- 12. Transmitting Antenna SCALA HDCA-10EB, 10 ELEMENT YAGIS
- 13. Antenna supporting structure SIDE-MOUNTED ON A STEEL TOWER
- 14. Overall height above ground 50 FEET
- 15. Main radiation lobe oriented 0, 180 AND 270 DEGREES, TRUE
- 16. Obstruction marking specifications In accordance with the following paragraphs of FCC Form 715
(attached): NONE REQUIRED
- 17. Conditions

The Commission reserves the right during said license period of terminating this license or making effective any changes or modification of this license which may be necessary to comply with any decision of the Commission rendered as a result of any hearing held under the rules of the Commission prior to the commencement of this license period or any decision rendered as a result of any such hearing which has been designated but not held, prior to the commencement of this license period.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained, so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the terms of this license, render such service as will serve public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the rights herein granted shall be transferred, assigned, or in any manner either voluntarily or involuntarily disposed of, or indirectly by transfer of control of the licensee, if a corporation, to any person without the written consent of the Commission. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Dated: January 18, 1985

Federal
Communications
Commission

CORRECTED LICENSE

APR 19 1985

FCC Form 365
September 1980

KJ

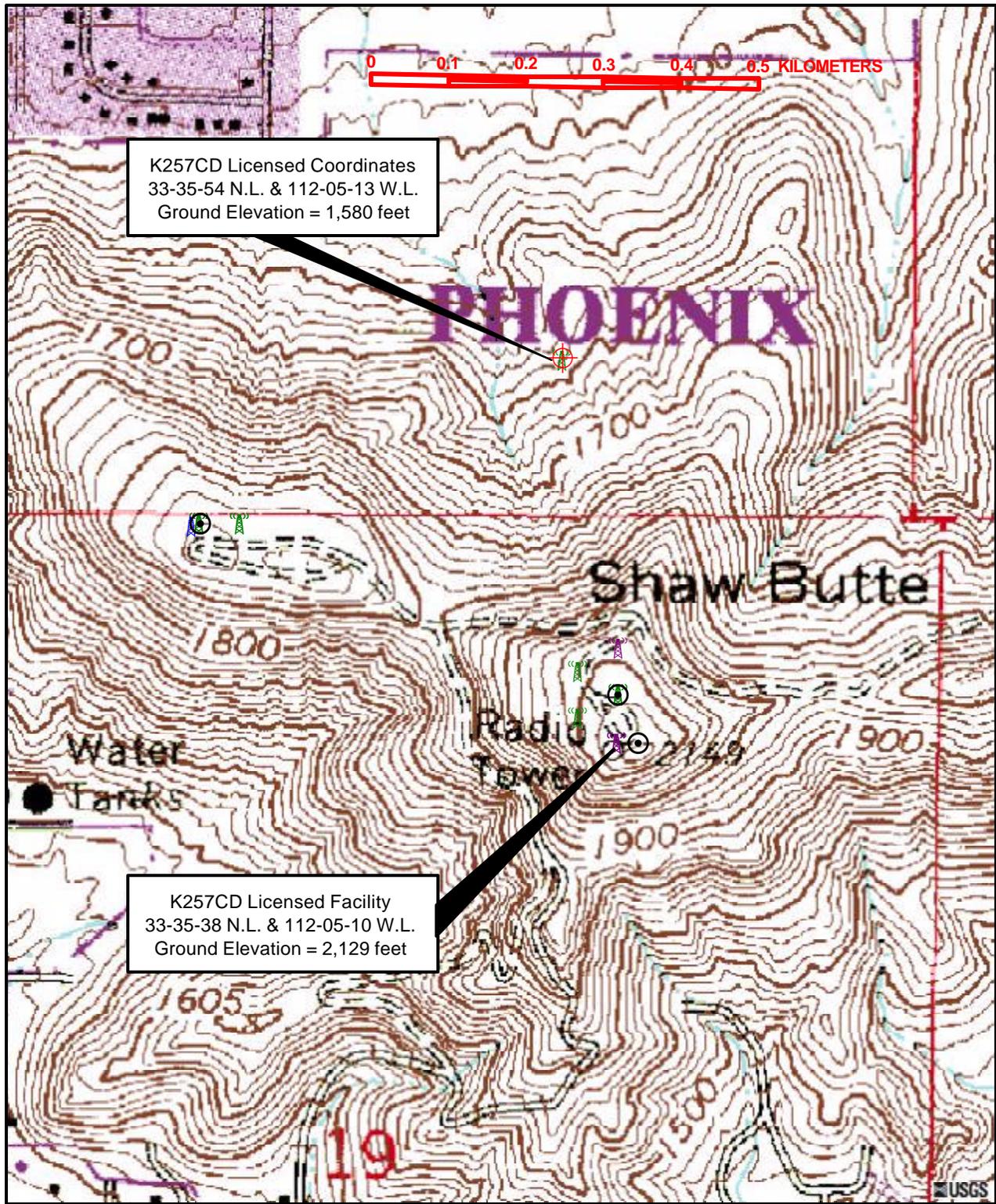
Section V, Page 1				
ENGINEERING DATA				
1. Facilities requested:				
a. Output Channel No.	Transmitter Output Power (watts)	Proposed Principal Community or Communities to be served:	Primary Station (station to be rebroadcast) (Translator only)	
257A	10 Watts	City: Phoenix & Glendale State: Arizona	Call: KSTM-FM Channel No. 296 City: Apache Junction	
b. Offset (Low Power TV and TV Translator Stations only)			State: Arizona	
<input type="checkbox"/> No offset <input type="checkbox"/> Plus offset <input type="checkbox"/> Zero offset <input type="checkbox"/> Minus offset			Frequency: 107.1 MHz	
c. Input Channel No.	If station is to operate via another translator station, indicate call sign and location of final intermediate translator:			
296	DOES NOT APPLY			
2. Proposed transmitter location:				
City	Phoenix	County	Maricopa	State
			Arizona	
Address or other description of location		Geographical coordinates of transmitting antenna to nearest second		
Atop of Shaw Butte - North West Section of Phoenix, Arizona		North Latitude	West Longitude	
		33° 35' 54"	112° 05' 13"	
Attach as Exhibit No. 200 a map or maps (preferably topographic, if obtainable, such as U. S. Geological Survey quadrangles) for the area of the proposed transmitter location and show drawn thereon the following data:				
a. Scale of miles. b. Proposed transmitter location accurately plotted. c. Principal community to be served by the proposed TV or FM translator station, clearly identified and labeled. d. Locations of all known radio stations (except amateur), such as AM, FM, TV, Translator, Police, Fire, Aeronautical, Public Utility, etc., and known commercial or government receiving sites, within the immediate vicinity of the proposed transmitter location.				
3. Transmitter:				
Make	Television Technology Corp.	Type No.	XL10FM	Rated output power (watts) P
				10 Watts
4. Transmission line:				
Make	Andrew	Type No.	LDF5-50	Length
				50 Ft.
				Rated efficiency E for length given (decimal fraction) 97.7%
5. Transmitting antenna				
Manufacturer	Scala Electronic Corporation	Model No.	FMO-4	Description
				Crossed Dipole Omni-Directional Antenna
			Power gain G (multiplier) in lobe of maximum radiation relative to a half-wave dipole	Height of radiation center above mean sea level
			2.0	2169" (ft)
Orientation	Height above ground	Elevation of Site	Elevation of Community	Effective radiated power R (R = F x E x G) (kW)
Omni-Directional Antenna	40' AGL	2129' MSL	1200' MSL	0.018 KW ERP
1. Give basic type using general descriptive terms such as half-wave dipole, "bow-tie" with screen, corner reflector, 10 element Yagi, 4 element in-phase array, two stacked 5 element Yagis, etc. 2. Show the direction of the main radiation lobe in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth. 3. Show height to topmost portion of structure, including highest top mounted antenna and beacon if any. 4. Show the ground elevation above mean sea level at the base of the transmitting antenna supporting structure. 5. Show the average elevation of the community above mean sea level, or in lieu thereof, the commonly used elevation figure for the community to be served.				

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

EXHIBIT 200

REPRODUCED AT THE NATIONAL ARCHIVES

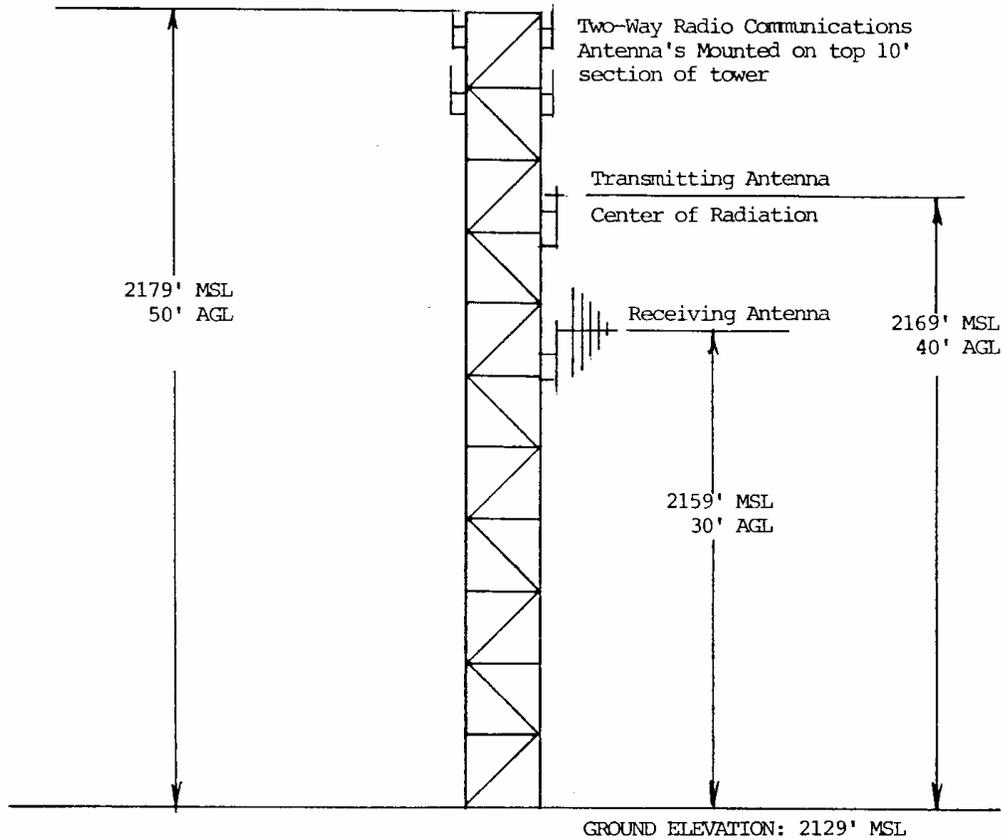




SHAW BUTTE RADIO TOWERS
AND BROADCAST FACILITY
AUTHORIZATIONS
DECEMBER, 2008

VERTICAL TOWER SKETCH

EXHIBIT 300



PROPOSED TOWER LOCATION:

N. Lat: 33° 35' 54"
W. Long: 112° 05' 13"

NOTE:

MSL = Mean Sea Level
AGL = Above Ground Level

PROPOSED TRANSLATOR:

Louis B. Burke, Jr.
INPUT CHAN: 296 - 107.1 Mhz.
OUTPUT CHAN: 257 - 99.3 Mhz.
SERVICE AREA: Phoenix, Glendale, Az.
DATE: January, 1984

Exhibit F

REPRODUCED AT THE NATIONAL ARCHIVES

SECTION VI

ENGINEERING DATA

1. Facilities requested

a. Output Channel No. 257 Transmitter Power Output 10.0 w Proposed Principal Community(ies) to be served Phoenix & Glendale City Phoenix & Glendale State AZ
 Frequency 99.3 MHz

Primary station (station to be rebroadcast - Translator station only)

Call Sign KSTM-FM City Apache Junction State AZ Frequency 107.1 MHz

b. Offset (Low Power TV and TV Translator Stations only) (Check one of the following)
 No offset Zero offset Plus offset Minus offset
 c. Input Channel Frequency No _____ MHz

If station is to operate via another translator station, indicate call sign and location of final intermediate translator

DOES NOT APPLY

2. Proposed transmitter location

City Phoenix State AZ
 County Mari Copia

Address or other description of location <u>1034 W. Sunny Side Dr. Atop of Shaw Butte, Phoenix Mtns. Preserve</u>	Geographical coordinates of transmitting antenna to nearest second North Latitude <u>33° 13' 15.4"</u> West Longitude <u>111° 20' 1.3"</u>
--	--

Attach as Exhibit No. 200 a map or maps (preferably topographic, if obtainable, such as Geological Survey quadrangles) for the area of the proposed transmitter location shown drawn thereon the following data

a. Scale of miles _____ c. Principal community to be served by the proposed station, clearly identified and labeled
 b. Proposed transmitter location accurately plotted

3. Transmitter	Make <u>McMartin Industries</u>	Type No. <u>BFM-8000</u>	Length _____	Output Power <u>10.0</u> Watts P
4. Transmission line	<u>Celwave</u>	<u>LLF-12</u>	<u>40 Ft.</u>	Rated efficiency E for length given (decimal fraction) <u>91.2%</u>

5. Transmitting antenna		Manufacturer <u>Scala Electronic Corp.</u>	Model <u>HDCA-10EB</u>	Description <u>10 Element Yagi Beam</u>
Orientation ²	Height above ground ³	Elevation of Site ⁴	Power gain G (multiplier) in lobe of maximum radiation relative to a halfwave dipole ⁵	
#1 - <u>180°</u>	<u>50 Ft.</u>	<u>2129' MSL</u>	<u>8.91</u>	
#2 - <u>270°</u>				
#3 - <u>0°</u>				

Effective radiated power R (E R P X E X G) .081 kw

Height of radiation center above mean sea level⁴ 2179' MSL ft

¹ Give basic type using general descriptive terms such as half wave dipole, bow tie, with screen, corner reflector, 10 element Yagi, 4 element in phase array, two stacked 5 element Yagis, etc.
² Show the direction of the main radiation lobe in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth.
³ Show height to topmost portion of structure, including highest free mounted antenna and tower, if any.
⁴ Show the ground elevation above mean sea level at the base of the transmitting antenna supporting structure.
⁵ Give the actual power gain toward the radio horizon.