

**DELAWDER COMMUNICATIONS, INC.**

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**ENGINEERING REPORT**

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**KSBL, FM Minor Modification for 269B (with Community Change to Isla Vista, CA)**

**EXHIBIT 31 –ENGINEERING STATEMENT REGARDING SECTION 73.215**

The proposal transmitter site for the Isla Vista channel 269B FM facility is short-spaced to the transmitter site of KSCA channel 270B (short by 8.8 km). The Applicant respectfully requests that the contour protection procedures of Section 73.215 be used to determine protection to this short-spaced facility. As demonstrated by Figure 31-1, attached, the application by KSCA is protected pursuant to Section 73.215 of the FCC Rules<sup>1</sup>.

Each service and interference contour of the short-spacing study has been determined at one-degree intervals for 360 degrees based on the requirements outlined in Section 73.215 of the FCC Rules. USGS 3 arc-second data have been used.

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<sup>1</sup> The contour overlap between the proposed 54 F50,50 service contour and the KSCA 48 dBu F50,10 interference contour is entirely over water except for the western part of the unpopulated Anacapa National Park Island. If deemed necessary by the FCC, a waiver request will be submitted regarding the overlap with this small unpopulated island.

**FIGURE E31-1: 73.215 STUDY TO KSCA 270B (USING MAX FACILITIES FOR KSCA)**

