

DISPLACEMENT/MODIFY BPFT-20100802AUL
THRESHOLD COMMUNICATIONS
K290BF FM TRANSLATOR
CH 222D - 92.3 MHZ - 0.115 KW
MODESTO, CALIFORNIA
January 2011

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Threshold Communications ("TC"), licensee of FM translator station K290BF, Channel 290D, Modesto, California. TC also has an outstanding permit to relocate K290BF to Channel 287D (BPFT-20100802AUL).¹ TC herein proposes to modify the outstanding permit to specify operation on Channel 222, due to reports of interference from station KMJ-FM, Channel 290B, Fresno, California.² Since the proposed channel change is beyond the adjacent channels, a waiver of §74.1233(a)(1) of the rules is respectfully requested. The proposed translator will continue to be used as a fill-in for co-owned station KVIN, 920 kHz, Ceres, California. See Exhibit A for a map.³

The operation of K290BF on any of the adjacent channels, including intermediate frequencies (IF) is not feasible due to one or more of existing facilities/allotments. The individual channel studies for the adjacent channels are attached as Exhibits B1 through B8. On

-
- 1) TC's original proposal to relocate K290BF to Channel 287D was the first step in a subsequent change to yet another channel. As a result of spectrum changes, K290BF cannot be relocated to the final channel as was originally anticipated. Further, TC cannot operate on Channel 287D for any long period of time due to the potential for interference to station KRVR, Channel 288A, Copperopolis, California, as shown in this instant modification application. Therefore, a permanent relocation to Channel 287D is not feasible.
 - 2) The short form application submitted by Mary V. Guthrie, BNPFT-20030317ASX, for Channel 222D at Modesto, California has been requested to be dismissed by the applicant. It is therefore not considered further herein. A copy of the requested dismissal is attached as Technical Exhibit A.
 - 3) As the proposed K290BF facility is located at the same site as the licensed facility, there is a common area of overlap between the 60 dBu contours.

each channel printout the station with the greatest preclusionary impact is indicated in italics. Channels 288, 291, 293, 236 and 237 are shown to have prohibited interference to an existing facility (or multiple facilities). In the case of Channels 287, 289 and 292, there is no predicted interference delivered to any station, using the standard FCC contour depictions. However, on each of these channels there is a nearby local station that has a significant signal arriving in the Modesto area, which would likely be impacted as a result of the operation of K290BF on any of these respective channels. As indicated on Exhibit B9, while the predicted 60 dBu contour of KRVR, Channel 288A, Copperopolis, California falls short of reaching Modesto, California and the predicted interfering contour of K290BF on a first adjacent channel would not overlap the protected KRVR contour, KRVR could still be impacted as a result. Due to the height of the KRVR transmitter over the valley in which Modesto is located, there is predicted 60 dBu signal arriving in the community.⁴ Due to the actual level of signal predicted to arrive in Modesto, operation of K290BF on either Channel 287D or Channel 289D could likely impact regular listeners of KRVR. Therefore, these two channels are not viable for a K290BF relocation. Possible operation on Channel 292D by K290BF would primarily affect KGAM, Channel 292A, Merced, California. While the predicted interfering contour of a theoretical K290BF on Channel 292D would not overlap with the protected contour of KGAM, KGAM could still be affected. Exhibit B10 shows the standard FCC contour depiction of KGAM's 60 dBu contour which does not reach Modesto. However, as a result of the KGAM site being located above the valley in which Modesto is situated, the signal of KGAM extends farther than the standard prediction.⁵

4) A Longley-Rice propagation analysis predicts that KRVR will provide in excess of a 60 dBu signal level beyond the K290BF translator site in Modesto. The parameters of the Longley-Rice prediction are indicated on Exhibit B9.

5) A Longley-Rice propagation analysis predicts that KGAM will provide in excess of a 54 dBu signal level beyond the K290BF translator site in Modesto. While this is below the protected contour level, it is still sufficient for regular listening. The parameters of the Longley-Rice prediction are indicated on Exhibit B10.

Based on the potential co-channel relationship, KGAM would in all likelihood be impacted were K290BF to operate on Channel 292. Based on the foregoing, it is respectfully requested that K290BF be allowed to move to Channel 222 and that a waiver of §74.1233(a)(1) of the rules be allowed.

As TC is proposing to for K290BF to remain at its authorized site on an existing tower, the Federal Aviation Administration was not apprised of this proposal. The tower on which the K290BF antenna, on Channel 222D, is to be located has been registered with the Commission and has been assigned Antenna Structure Registration Number 1245129. Attached as Exhibit C is a study demonstrating that the proposed K290BF translator, on Channel 222D, will not cause interference to any full service station (in a populated area), nor will interference be delivered to or received from any existing FM translator station or LPFM facility.

As the proposed antenna system is to be located on a tower which is mounted atop an existing building, the worksheets associated with FCC Form 349 were not used to certify compliance with the Commission's RF exposure limits. Attached, as Exhibit D, is a study which shows this proposal is in compliance with the exposure limits.

All other necessary documentation used to certify the technical portion of FCC Form 349 has been forwarded to TC and is available to the Commission upon request.⁶

6) Only the radiofrequency exposure analysis was conducted as part of the environmental analysis for this instant application by Graham Brock, Inc.. All data related to FM stations was extracted from the CDBS based on the date listed on the attached interference study. We assume no liability for errors or omissions in that database which may be adverse to the proposal contained herein.

Jeff Brock - Graham Brock, Inc.

From: Jim Bryan [jim@krvr.com]
Sent: Friday, January 28, 2011 5:08 PM
To: 'Jeff Brock - Graham Brock, Inc.'
Subject: FW: Translator Dismissal - File No. BNPFT - 20030317ASX
From: maryguthrie@hotmail.com
To: robert.gates@fcc.gov
Subject: Translator Dismissal - File No. BNPFT - 20030317ASX
Date: Fri, 28 Jan 2011 21:44:25 +0000

January 28, 2011

Robert Gates
Media Bureau / Audio Division
Robert.Gates@fcc.gov

RE: New FM Translator
Application
File No. BNPFT - 20030317ASX
Facility ID No: 140752

Dear Mr. Gates:

I voluntarily request the dismissal of my translator application for Modesto, California, File No. BNPFT - 20030317ASX.
Facility ID No. 140752

Sincerely,

Mary V. Guthrie
FCC Registration No. 0008530677

1/31/2011

TECHNICAL EXHIBIT A