

**Section 74.1204 - Statement of Compliance
AM Revitalization Auction 100 FM Translator
Long-Form Application Filing Window
NEW FM Translator Station Facility ID. 202810
Tech Box Proposal FCC File No. BNPFT-20180129AGU
April, 2018**

The instant “Long Form Application for FM Translator in Auction Window 100” is filed in response to the FCC’s Public Notice, DA 18-256, Released March 15, 2018, for a new FM translator station to rebroadcast Class B AM station: KSKY, Balch Springs, TX (Facility ID 6591). The Public Notice announced a window, open from April 18, 2018, to May 9, 2018, for the filing of FM translator new station construction permit applications for “Tech Box” proposals identified as not mutually exclusive with any other Tech Box proposals from the Auction 100 filing window.

This long-form application specifies a directional antenna but is otherwise identical to the technical facility specified in the Tech Box proposal. Therefore, the instant proposal is a minor change relative to the technical facility in the current Tech Box proposal. Further, the instant long-form application does not create a new conflict to any pending Auction 100 Tech Box proposal, or to any prior-filed Form 349 application. As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

The required protection to second-adjacent channel stations KZPS(FM), Dallas, TX (Channel 223C) and KLIF-FM, Haltom City, TX (Channel 227C2) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein

The proposed transmitting antenna will be located within the protected contour of both stations listed above resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, KZPS(FM) is predicted to produce an F(50,50) signal strength of 85 dBu while KLIF-FM is predicted

to produce an F(50,50) signal strength of 81 dBu. Therefore, KLIF-FM provides for a worst-case interference analysis. In the vicinity of the second-adjacent channel translator station, the translator's worst-case interfering contour is the 121 dBu contour. According to free space calculations, the translator's predicted interfering contour will extend only 20.8 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 148 meters above ground level, the predicted interference area will neither reach ground level nor reach any people. Therefore, the proposed minor change will cause no interference to any population served by either KZPS(FM) or KLIF-FM.

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been "demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable".

Key to Stations on Map

- FX.APP
- K225CM.CP.225D.FAC.ID.144076
- KYYE-LP.225L1.FAC.ID.196887
- KGPJ-LP.225L1.FAC.ID.195819

Section 74.1204 CoChannel
Contour Overlap Study

Exhibit 1

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Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):

- 40 dBu F(50,10) to Class A & FX & LPFM
- 40 dBu F(50,10) to Class C, C0, C1, C2, C3
- 37 dBu F(50,10) to Class B1 FM Station
- 34 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):

- Class A, C, Cx, FX & LPFM = 60 dBu F(50,50)
- Class B1 FM Station = 57 dBu F(50,50)
- Class B FM Station = 54 dBu F(50,50)

FX.APP

Dallas, TX

Latitude: 32-46-43 N

Longitude: 096-43-51 W

ERP: 0.01 kW

Channel: 225

Frequency: 92.9 MHz

AMSL Height: 274.0 m

Horiz. Pattern: Directional



Scale 1:517,292

