

***APPLICATION FOR MODIFICATION  
OF CONSTRUCTION PERMIT***

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**FM TRANSLATOR STATION K273CT  
OXNARD, CALIFORNIA  
FACILITY ID: 143307  
102.5 MHz / 0.150 kW ERP / DA**

**GOLD COAST BROADCASTING LLC**

**MARCH, 2017**

## **APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT**

The following engineering statement and attached exhibits have been prepared for **Gold Coast Broadcasting LLC** ("Gold Coast"), permittee of FM translator station K273CT at Oxnard, California, and are in support of their application for modification of construction permit.<sup>1</sup> This application has become necessary due to the severe winter weather in California. Specifically, as a result of the excessive rainfall and flooding, the condition of the soil in the immediate vicinity of the tower authorized for use by K273CT is currently unsuitable for the operation of vehicles and equipment required for the installation of the antenna.

As a result, Gold Coast seeks to modify the existing construction permit so as to utilize an existing short structure located adjacent to the transmitter building. This structure, a small lattice tower, is utilized to support the receive antenna for associated broadcast auxiliary facilities. Once the facility described in this application is constructed, Gold Coast will seek authority to relocate the transmitter back to the technical parameters specified in the extant construction permit.<sup>2</sup>

This structure would have an overall height above ground level of 51 feet (15.5 meters). This height corresponds to an electrical height of 29.9 degrees at the 1590 kHz, which is the frequency of operation of KVTB. This height is less than the action height for structures in the

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<sup>1</sup> The Facility ID for K273CT at Oxnard, California is 143607.

<sup>2</sup> See FCC File No. BMPFT-20161227ABB.

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vicinity of AM transmission facilities, and as a result, no special notifications or considerations are required.<sup>3</sup> Additionally, a TOWAIR study indicates that this structure would not require registration, and passes slope calculations to the Oxnard Airport.

K273CT is authorized to operate on FM channel 273, with a maximum effective radiated power of 120 Watts at a center of radiation of 75 meters above mean sea level, 60 meters above ground level, utilizing a directional antenna. The proposed facility would operate on FM channel 273 with a maximum effective radiated power of 150 Watts. The proposed center of radiation is 33.5 meters above mean sea level, which corresponds to an elevation of 15 meters, 49 feet, above ground level. The same directional antenna continues to be proposed for use under this application, at the same orientation.<sup>4</sup>

The proposed site location is located approximately 49 meters from the authorized location. This relocation distance implies significant overlap between the proposed and authorized facilities. This fact, combined with the lack of change in the channel of operation, implies that the proposed changes to the K273CT technical parameters are minor in nature.

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<sup>3</sup> The Facility ID for KVTa at Ventura, California is 7746. KVTa is also licensed to Gold Coast.

<sup>4</sup> The text of the technical exhibit for the current construction permit referenced combined use with

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K273CT is currently authorized to serve as a translator for AM station KUNX at Santa Paula, California.<sup>5</sup> The proposed facility would continue to qualify as a translator for that station, which is licensed to Gold Coast. Exhibit E-1 provides an illustration of the proposed K273CT 60 dBu service contour, along with the KUNX 2 mV/m daytime contour, and a twenty-five mile radius centered on the KUNX transmitter site. As this map demonstrates, the predicted 60 dBu contour is wholly contained within both of the KUNX constructs.

The proposed facility complies with the provisions of Section 74.1204 of the Commission's Rules. Exhibit E-2 is a tabular interference study for the proposed facility. This study demonstrates that the proposed K273CT facility would comply with the contour overlap provisions of that section of the Commission's Rules to all relevant facilities with the exception of KXLM and the licensed facilities for K271CA, both at Oxnard, California.<sup>6</sup> The situation to these two facilities will be considered under the provisions of Section 74.1204(d) of the Commission's Rules. This tabular study is graphically illustrated in the contour map that comprises Exhibit E-3.

Although normally prohibited contour overlap between the proposed facility and both KXLM and K271CA would occur, no populated areas would be affected by the potential interference

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<sup>5</sup> The Facility ID for KUNX at Santa Paula, California is

<sup>6</sup> The Facility ID for KXLM at Oxnard, California is 34349. The Facility ID for K271CA for Oxnard, California is 151638.

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region. The antenna for KXLM, is co-located at the same site that is to be utilized by K273CT.

KXLM is licensed with an effective radiated power of 5.5 kW. As a result of the proximal location to the translator, and disparity between the ERP values, no locations exist where the field strength of the proposed facility would be in excess of 40 dB above the field strength of KXLM.

Exhibit E-4 illustrates the proposed transmitter site location for K273CT, along with the K271CA 61.1 dBu service contour. As this map demonstrates, the 61.1 dBu service contour intersects the proposed site. Since K271CA operates second adjacent to K273CT, interference to the former would be predicted to occur in regions where the K273CT field strength is at least 40 dB higher. The worst-case extent of potential will therefore be set assumed to be the 100 dBu F(50,10) contour from K273CT.

The following image illustrates the K273CT 100 dBu F(50,10) overlaid on a satellite image in the vicinity of the K273CT transmitter site. As this image demonstrates, the 100 dBu F(50,10) contour does not intersect any structures and in fact only overlays a portion of a golf course.

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The proposed facility would not result in a significant environmental impact, and is exempt from environmental processing. The addition of the antenna to the registered structure would not increase the already existing environmental impact present from the tower. The structure will be placed on an existing concrete pad, and then braced to the transmitter building. As a result, ground disturbance will not be necessary.

The antenna utilized is a Kathrein-Scala CA5-FM/CP/RM circularly polarized antenna. This particular antenna is not one of the types specifically identified under the Commission's *FM Model* utility. As a result, it will be assumed to be a single bay type-1 antenna. The power density

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3.15.2017

calculated for this set of parameters is  $35.6 \mu\text{W}/\text{cm}^2$ . This value complies with the upper limit permissible under the uncontrolled environment condition.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2017

Jeremy D. Ruck, PE  
March 15, 2017

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**K273CT.X**

BMPFT20161227ABB  
Latitude: 34-14-16.89 N  
Longitude: 119-12-05.52 W  
ERP: 0.15 kW  
Channel: 273  
Frequency: 102.5 MHz  
AMSL Height: 33.5 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

*Jeremy Ruck & Associates, Inc.*

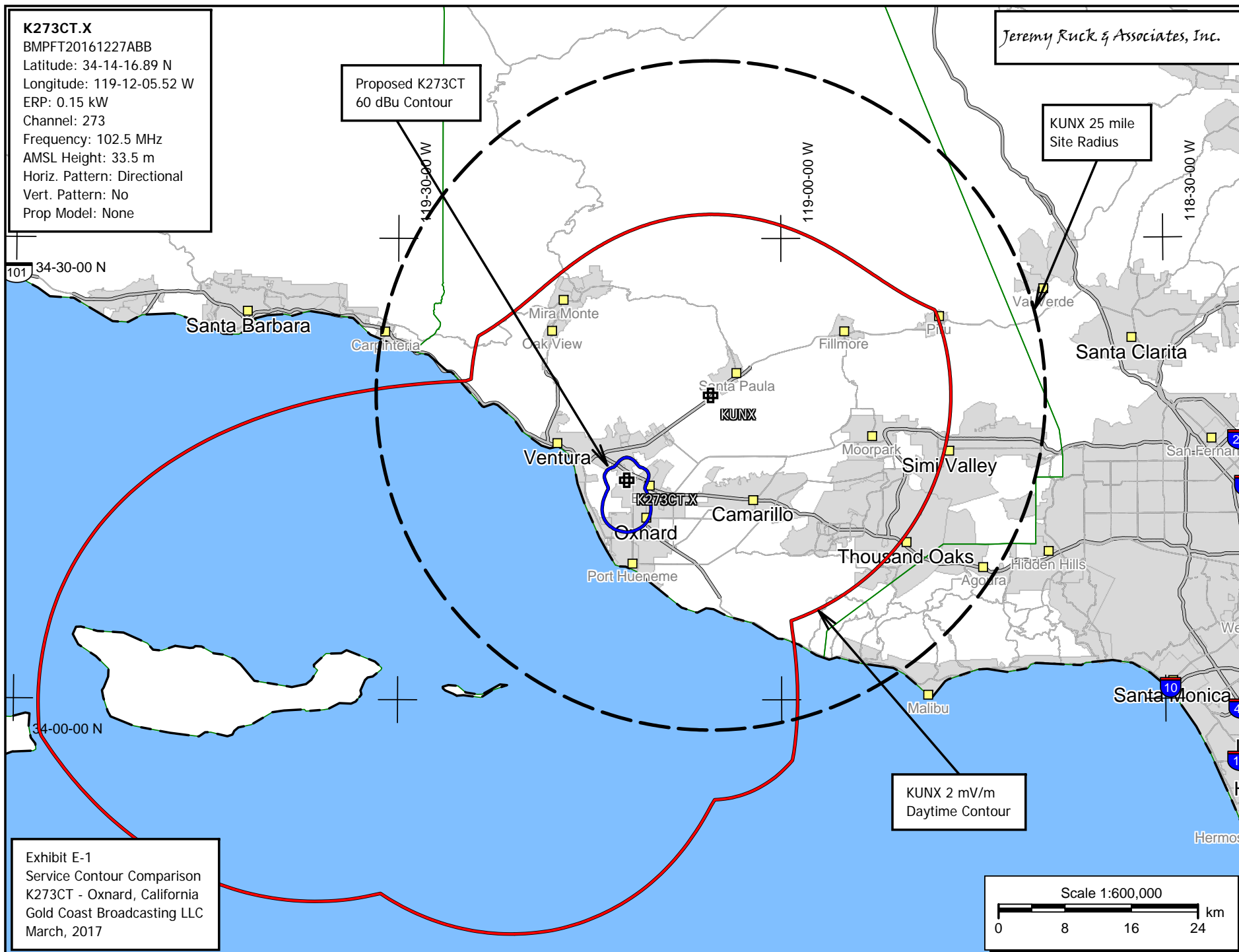
Proposed K273CT  
60 dBu Contour

KUNX 25 mile  
Site Radius

KUNX 2 mV/m  
Daytime Contour

Exhibit E-1  
Service Contour Comparison  
K273CT - Oxnard, California  
Gold Coast Broadcasting LLC  
March, 2017

Scale 1:600,000  
0 8 16 24 km





Jeremy Ruck & Associates, Inc.  
Consulting Engineers - Canton, Illinois

Exhibit E-2 - Tabular Interference Study  
K273CT - Oxnard, California  
CH# 273D - 102.5 MHz, Pwr= 0.15 kW DA, HAAT= -38.8 M, COR= 33.5 M  
Average Protected F(50-50)= 6.24 km  
Standard Directional

REFERENCE  
34 14 16.9 N.  
119 12 05.5 W.

DISPLAY DATES  
DATA 03-15-17  
SEARCH 03-15-17

CH CITY	CALL	TYPE STATE	ANT AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
275A Oxnard	KXLM	LIC _CN CA	222.8 42.8	0.20 BLH19920624KE	34 14 12.0 119 12 11.0	5.500 34	1.9 102	18.5 Lazer Licenses, LIc	-6.0*	-18.7*
273D Oxnard	K273CT	CP DC_ CA	216.5 36.5	0.15 BMPFT20161227ABB	34 14 13.0 119 12 09.0	0.120	6.7 75	2.2 Gold Coast Broadcasting LI	-11.4*	-17.8*
274B Los Angeles	KIIS-FM	LIC DCN CA	90.4 271.0	104.39 BLH5361	34 13 36.0 118 03 57.0	8.000 902	112.0 1802	90.2 Citicasters Licenses, Inc.	-10.1*	8.5
272D Fillmore	K272DI	LIC _CN CA	57.0 237.1	17.87 BLFT19941115TA	34 19 32.0 119 02 18.0	0.010 468	21.1 700	13.5 Santa Monica Community Col	-5.7*	0.7
271D Oxnard	K271CA	LIC DC_ CA	151.2 331.3	4.64 BLFT20150911ABC	34 12 05.0 119 10 38.0	0.250	0.5 35	5.0 Lazer Licenses, LIc	-1.3*	-0.9*
271D Ojai	K271AC	LIC DCN CA	315.2 135.1	17.42 BLFT19940518TF	34 20 57.0 119 20 07.0	0.010 434	0.0 636	2.4 Santa Monica Community Col	14.9	13.6
273B Santa Maria	KSNI -FM	LIC _CN CA	301.5 120.8	128.43 BLH19891120KB	34 50 08.0 120 24 06.0	13.500 262	109.9 433	52.0 Agm California, Inc.	17.7	58.6
270B Glendale	KSCA	LIC _CX CA	90.5 271.2	104.71 BMLH20111031ADQ	34 13 26.0 118 03 45.0	4.800 863	4.5 1763	85.3 Uni vi si on Ra di o Li cense Co	97.4	18.4
272D Santa Barbara	K272DT	LIC DC_ CA	300.3 120.0	50.45 BLFT20140402AQD	34 27 57.0 119 40 37.0	0.115 274	24.6 666	15.7 Cal i forni a Lu theran Uni ver	23.2	27.0
274D Santa Barbara	K274CJ	LIC DV_ CA	300.9 120.6	50.64 BLFT20161102ABG	34 28 15.0 119 40 33.0	0.120	20.8 733	8.6 Gold Coast Broadcasting LI	29.9	28.1
272A Compton	KJLH	LIC _C_ CA	108.8 289.2	82.03 BLH20001201AAY	33 59 52.0 118 21 32.0	5.600 103	46.6 166	29.9 Taxi Li cense Corporation	31.6	45.9
274D Santa Barbara	K274CJ	APP DC_ CA	300.9 120.6	50.64 BMPFT20170227AAW	34 28 15.0 119 40 33.0	0.070	11.5 738	3.2 Gold Coast Broadcasting LI	38.8	31.7
274D Santa Barbara	K274CJ	CP DC_ CA	300.9 120.6	50.64 BPFT20170127AAI	34 28 15.0 119 40 33.0	0.070	11.5 733	3.2 Gold Coast Broadcasting LI	38.8	31.7
274D Santa Clarita	KIIS-FM1	LIC DV_ CA	79.4 259.7	56.29 BLFTB20150901ACH	34 19 48.0 118 35 56.0	0.210	4.2 1071	2.3 Citicasters Licenses, Inc.	49.4	49.9

Terrain database is FCC 30 meter , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM  
In & Out distances between contours are shown at closest points. Reference zone= East Zone 2A, Co to 3rd adjacent.  
All separation margins (if shown) include rounding.  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
""affixed to 'IN' or 'OUT' values = site inside restricted contour.  
Reference station has protected zone issue: Mexico- AM tower

**K273CT.X**

BMPFT20161227ABB

Latitude: 34-14-16.89 N

Longitude: 119-12-05.52 W

ERP: 0.15 kW

Channel: 273

Frequency: 102.5 MHz

AMSL Height: 33.5 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None

*Jeremy Ruck & Associates, Inc.*

- 60 dBu F(50,50) Service Contour
- 54 dBu F(50,50) Service Contour
- 34 dBu F(50,10) Interference Contour
- 40 dBu F(50,10) Interference Contour
- 48 dBu F(50,10) Interference Contour
- 54 dBu F(50,10) Interference Contour
- 100 dBu F(50,10) Interference Contour

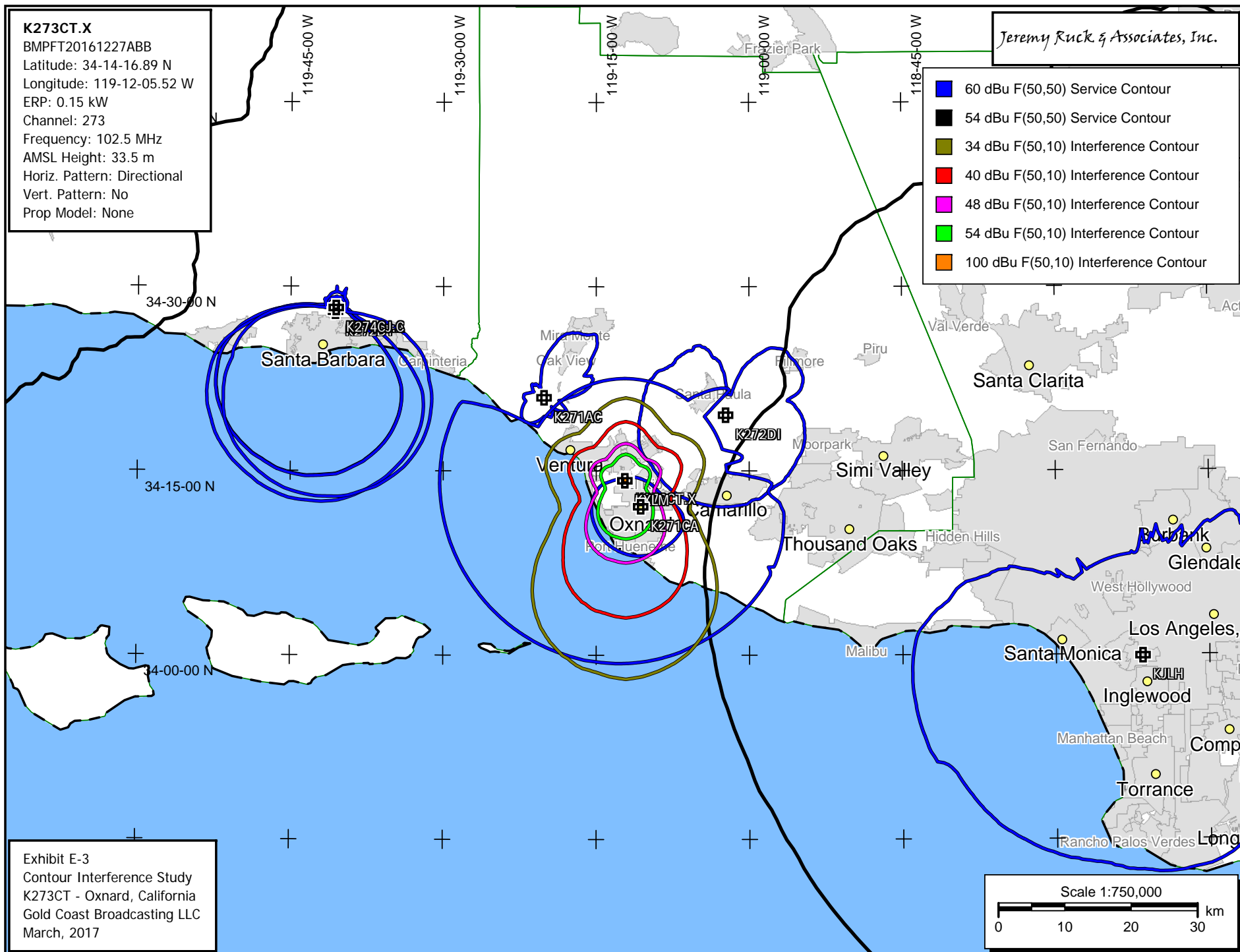


Exhibit E-3

Contour Interference Study

K273CT - Oxnard, California

Gold Coast Broadcasting LLC

March, 2017

Scale 1:750,000

0 10 20 30 km

**K273CT.X**

BMPFT20161227ABB  
Latitude: 34-14-16.89 N  
Longitude: 119-12-05.52 W  
ERP: 0.15 kW  
Channel: 273  
Frequency: 102.5 MHz  
AMSL Height: 33.5 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**K271CA**

BLFT20150911ABC  
Latitude: 34-12-05 N  
Longitude: 119-10-38 W  
ERP: 0.25 kW  
Channel: 271  
Frequency: 102.1 MHz  
AMSL Height: 35.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

34-13-00 N

34-12-00 N

**Exhibit E-4**

Interference Study  
K273CT - Oxnard, California  
Gold Coast Broadcasting LLC  
March, 2017

K273CT Transmitter Site

K273CT.X

K273CT 100 dBu  
F(50,10) Contour*Jeremy Ruck & Associates, Inc.*K271CA 60 dBu  
F(50,50) ContourK271CA 61.1 dBu  
F(50,50) Contour

K271CA Transmitter Site

K271CA

Oxnard

El Rio

101

Scale 1:50,000

0 0.7 1.4 2.1 km