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**Engineering Statement
Re Application of Idaho State Board of Education
For a New FM Station on Channel 207A at Ketchum, Idaho
December 2022**

This Engineering Statement has been prepared on behalf of Our Lady of the Snows Foundation (“OLSF”), applicant for a new NCE FM station on Channel 207A at Ketchum, Idaho (FCC File No. 0000167668), in support of OLSF’s Opposition to a Petition to Deny which was filed by the Idaho State Board of Education (“ISBE”).

ISBE is a competing application for the use of Channel 207A at Ketchum, and filed its own application (FCC File No. 0000166951) during the 2021 NCE FM filing window. The ISBE application, however, fails to provide a 60 dBu contour to any portion of Ketchum. This is demonstrated by the attached contour map, which was prepared using the exact technical parameters which were specified in ISBE’s Schedule 340 application. The resulting 60 dBu contour falls short of Ketchum by fully 58 kilometers. This results in a clear violation of §73.515 of the Commission’s Rules, which requires for NCE FM stations that “a minimum field strength of 1 mV/m (60 dBu) will be provided over at least 50 percent of its community of license or reach 50 percent of the population within the community.” The ISBE application fails on both of those tests.

Certification

This Engineering Statement has been prepared by the undersigned on behalf of Our Lady of the Snows Foundation. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a staff engineer in the firm of Hatfield & Dawson

Consulting Engineers and am Registered as a Professional Engineer in the State of Washington.

December 5, 2022



Erik C. Swanson, P.E.

