

## Gary Rose

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**From:** kwavefm@xyz.net  
**Sent:** Thursday, May 10, 2018 9:29 PM  
**To:** Gary Rose  
**Cc:** kwavefm  
**Subject:** KSRM Opposition to TBC Petition to Deny

**Importance:** High

Dear Mr. Rose;

Thank you for sending me the KSRM 'Opposition' to TBC Radio's Petition to Deny KSRM's recently filed application to rebroadcast KSRM AM 920 KHz on a new translator proposed for 103.3 MHz Soldotna, AK.

With regard to your question about the Site 17 AT&T Alascom tower "coordinates problem", I can offer the following information:

Peninsula Communications, Inc. (PCI) was originally granted a CP for an FM translator on 100.9 MHz at "Site 17" in Soldotna on April 10, 1984 to rebroadcast KGTL AM 620 Homer VIA KGTL-FM, SCA, Homer, AK. An official waiver of FCC Rules 74.1235(a) and 74.1231(b) for the crossband SCA feed was granted to PCI per letter from E. C. Gursky, Chief Auxiliary Services Branch, Audio Services Division dated November 7, 1984. Transmitting antenna location is listed in the CP as "Mile 3.5, Kenai Spur Road, Alascom Radio Relay Site, Soldotna, AK". NAD 27 Coordinates are listed as:

N LAT 60 deg. 31 min. 57 sec.  
W LONG 151 deg. 04 min. 51 sec.

PCI was granted a CP to change the input channel to KGTL-FM direct on November 18, 1985. Transmitting antenna location is listed in the CP as "Mile 3.5, Kenai Spur Road, Alascom Radio Relay Site, Soldotna, AK. NAD 27 Coordinates are listed as:

N LAT 60 deg. 31 min. 57 sec.  
W LONG 151 deg. 04 min. 51 sec.

PCI was granted a license to cover March 11, 1986 with the same coordinates as above.

PCI was granted a CP to change the output channel from from 100.9 MHz to 104.5 MHz on Sept. 6, 1991. NAD 27 Coordinates are listed as :

N LAT 60 deg. 31 min. **26** sec.  
W LONG 151 deg. 04 min. 51 sec.

**NOTE THAT THIS IS THE ORIGIN OF THE MISTAKE IN THE NORTH LATITUDE COORDINATE.**

It appears that from this point forward, this mistake was never caught because the current listing in the FCC Database still shows the incorrect coordinate for North Latitude when I checked today. I was unaware this problem until today.

For your information the ALASCOM TOWER was initially registered the first time as ASRN # 1005575 on 11/07/96 per letter from Pamela Rust with AT&T Atlanta, GA dated May 12, 1997. NAD 27 Coordinates are listed per the FCC ASRN as:

LAT "N 60-31-58" LONG "W 151-04-52"

However checking the FCC database now shows the ASRN #1005575 NAD 27 coordinates as of August 16, 2016:

LAT "N 60 deg. 31 min. 57.65348 sec." LONG. "W 151 deg. 04 min. 51.28938 sec."

Note the new discrepancy on the Longitude (i.e.) **52** versus **51** seconds (when rounded down).

In summary, the main reason KSRM consulting engineer could not find the correct location in the FCC Database for K283AB at the AT&T Alascom antenna site in Soldotna is probably twofold:

- 1) The source of the incorrect coordinates came from the CP grant dated 9/6/91 (a mistake that I never caught). Note that the new ASRN #1005575 for the Alascom tower was not assigned until 11/07/96, about 5 years after PCI occupied the site.
- 2) For whatever reason, the ASRN was never added by the FCC to the Database for K283AB.

I have forwarded some photos to TBC taken on 5/09/18 showing that K283AB is in fact located at the ATT Alascom tower, **again where it has been located ever since March 11, 1986.**

Moreover, the license for K283AB is currently valid until Feb. 01, 2022. **Again, the FCC Database is not up to date.**

I assume the reason for this is primarily due to the lengthy FCC proceeding that started in 1998 (due to a KSRM PTD) and culminated last year in 2017 with the grant of all PCI license renewals at the time. The FCC renewed three PCI FM translators unconditionally and conditionally renewed 8 other PCI FM translators. These are the ones subsequently sold to TBC LLC by PCI, including K283AB, to in order to satisfy the FCC requirement for PCI to come into compliance with the FCC ownership limitation.

I hope this provides some useful information for TBC to respond to KSRM's mistaken Opposition.

The fundamental problem is not interference caused by KSRM's proposed FM translator operating on 103.3 MHz to the off air reception of any distant FM station operating on 103.3 (obviously there is no such station) but interference that will be produced to the input channel of K283AB (103.5 MHz), coming from a very strong KSRM signal on the first adjacent channel (103.3 MHz).

A RadioSoft ComStudy shows the KWVV-FM 103.5 MHz received signal strength at the Alascom tower to be approximately **29 dBu**. The RadioSoft ComStudy shows the KSRM 103.3 MHz predicted signal strength to be about **85 dBu**. **There will be about a 56 dB difference in signal levels of both received signals just 200 KHz apart** at the input to K283AB. The down-converter of the TEPCO J-317 will simply become overloaded by the nearby KSRM signal, thereby desensitizing the translator input and will cause the quality of the KWVV-FM signal to sound horrible.

Therefore, it is extremely unlikely in my opinion that there would be no interference caused by the proposed KSRM operation to K283AB. This is based on my last 39 years of broadcast engineering experience with first hand knowledge of the specifications and performance in the field of typical TEPCO J-317 FM translators.

Finally, please note that over the past 20 years, KSRM has filed multiple Petitions to Deny against PCI for every license renewal period since 1998. ***It wouldn't surprise me at all to find out that this is just another deliberate attempt by KSRM to cause problems by attempting to "JAM" the reception of KWVV-FM Homer, AK on the translator rebroadcasting KWVV-FM in the Soldotna, Alaska area, operating from the same Alascom site continuously since 1986 or about 32 years.***

Best regards,

David Becker  
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FCC PG-23-1349

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