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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Green Acres, CA) )

MM Docket No. 98-4  
RM - 7880

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Double D Broadcasting Company, the licensee of FM Broadcast Station KRAB, Green Acres, California ("KRAB"), by its attorneys and pursuant to Section 1.420(g) of the Commission's rules, hereby petitions for the institution of a rulemaking proceeding to amend the FM Table of Allotments, Section 73.202(b), as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Green Acres, CA	292A	291B1

KRAB also requests modification of its license to specify operation on Channel 291B1. In support whereof the following is shown:

KRAB is currently authorized to operate on Channel 292A, Green

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Acres, California. Section 1.420(g)(3) permits the modification of the license of an FM station to another class of channel where the modification would occur on a mutually exclusive higher class adjacent channel. KRAB seeks to modify its license to specify first adjacent Channel 291 and superior Class B1 facilities.

As set forth in the attached Engineering Statement of Robert W. Denny, Jr., P.E., of Jules Cohen & Associates, P.C., the proposed channel substitution can be accomplished in compliance with the Commission's allocation standards, including the minimum distance separation requirements of Section 73.207 and the principal community coverage and line-of-sight requirements of Section 73.315(a) and (b), respectively.<sup>1</sup>

The proposed channel substitution would promote the public interest by allowing KRAB to upgrade its facilities. The improved signal would permit KRAB to increase its predicted area of coverage and thereby provide better service to Green Acres and listeners who reside within the station's service area.

If the requested channel substitution and license modification are granted, KRAB will promptly file an application for a construction permit to operate as a Class B1 station on Channel 291 and, if granted, to promptly construct the proposed facilities.

For the foregoing reasons, KRAB requests that the Commission

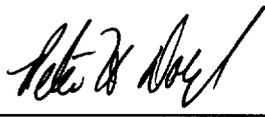
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<sup>1</sup> KRAB requires a site restriction of 35.6 kilometers east - northeast of the principal community. The reference coordinates of the proposed Channel 291B1 allotment are: 35°29'02" North Latitude and 118°44'12" West Longitude.

issue a Notion of Proposed Rule Making proposing the substitution of Channel 291B1 for 292A and the modification of its license to specify operation thereon.

Respectfully submitted,

DOUBLE D BROADCASTING COMPANY

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November 20, 1991

phd00226

**ENGINEERING STATEMENT  
IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND SECTION 73.202(b), TABLE OF ALLOTMENTS  
DOUBLE D BROADCASTING COMPANY  
STATION KRAB(FM)  
GREEN ACRES, CALIFORNIA**

This engineering statement was prepared on behalf of Double D Broadcasting Company (Double D), in support of a Petition for Rule Making to amend Section 73.202(b), Table of Allotments, to substitute channel 291B1 for channel 292A at Green Acres, California, and to modify the authorization for its station KRAB(FM), Green Acres, California, to specify operation on the higher class channel.

The substitution of channel 291B1 for channel 292A at Green Acres will require a site restriction 35.6 kilometers east-northeast of the community. The proposed reference coordinates for the allotment are:

35° 29' 02" North Latitude,  
118° 44' 12" West Longitude.

The proposed allotment is 1,470 kilometers from the Canadian border and 359 kilometers from the Mexican border, so no special negotiations with these countries are required to effect the upgrade.

Figure 1 sets forth the distances from the reference site to other assignments and allotments and compares those distances with the required minimum distance separations of Section 73.207(b)(1) of the Rules. The figure shows that all minimum distance separation requirements are satisfied.

Engineering Statement  
KRAB(FM), Green Acres, California

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Figure 2 is a tabulation of distances to the 70 dBu coverage contour calculated using the standard coverage prediction methodology described in Section 73.313 of the Rules. Figure 3, which was prepared using the data from Figure 2, shows that the 70 dBu contour for KRAB operating at the reference site with maximum Class B1 facilities<sup>1</sup> would enclose the entire principal community as required by Section 73.315(a) of the Rules. Inspection of the terrain profile for the 251.8° True radial through Green Acres shows an unobstructed line-of-sight path from the antenna radiation center to the principal community in compliance with Section 73.315(b) of the Rules.

Double D has determined that numerous sites are available in the vicinity of the proposed reference site that would allow operation of KRAB on channel 291B1 in full compliance with the FCC's Rules. If the proposed substitution is made, Double D will promptly file a construction permit specifying operation on the higher class channel and, upon grant of that construction permit, will begin construction without delay.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on November 18, 1991.



Robert W. Denny, Jr., P.E.

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<sup>1</sup> Effective radiated power of 25 kilowatts and antenna radiation center height above average terrain of 100 meters were assumed in the calculations. The site elevation for the reference site, obtained from the U.S.G.S. 7.5-minute topographic quadrangle map for Mt. Adelaide, California, is 683 meters (2240 feet) above mean sea level. The assumed antenna radiation center height above mean sea level used in determining the location of the 70 dBu contour was 910 meters.

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DOUBLE D BROADCASTING COMPANY  
STATION KRAB(FM)  
GREEN ACRES, CALIFORNIA**

Allocation Study  
Ch. 291B1, Green Acres, California<sup>1</sup>

Reference coordinates:      35° 29' 02" North Latitude  
   118° 44' 12" West Longitude

<u>Channel</u>	<u>Nearest Assignment or Allotment Considered</u>	<u>Geographic Coordinates</u>	<u>Distance Separation</u>		
			<u>Required (km)</u>	<u>Actual (km)</u>	<u>Clear (km)</u>
237B1	KLLY, Oildale, CA	35°27'33" N 119°01'13" W	14	25.9	11.9
238B	KLOS, Los Angeles, CA	34°13'37" N 118°03'58" W	17	152.3	135.3
288A	KAVC, Rosamond, CA	34°51'03" N 118°09'22" W	48	87.9	39.9
289A	Allocation, Avenal, CA	36°00'18" N 120°07'54" W	48	138.8	90.8
290B	KPWR, Los Angeles, CA Appl.: BPH-831216CY	34°13'40" N 118°04'00" W	145	152.2	7.2
291B1	KWSP, Santa Margarita, CA C.P.: BPH-880111II	35°21'38" N 120°39'21" W	175	174.8	-0.2 <sup>2</sup>
292A	KGMX, Lancaster, CA	34°44'41" N 118°07'30" W	96	99.2	3.2
293A	KOUI, Lucerne Valley, CA C.P.: BPH-880714MS	34°23'08" N 117°03'25" W	48	196.0	148.0
294B	KJUG-FM, Tulare, CA	36°17'08" N 118°50'17" W	71	89.4	18.4

<sup>1</sup> Study assumes substitution of channel 291B1 for channel 292A at Green Acres, California.

<sup>2</sup> Rounds to zero.

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GREEN ACRES, CALIFORNIA**

Tabulation of Average Elevations and Distances to 70 dBu Contour

<u>Azimuth</u> (deg. T)	<u>3-16 km Terrain Average</u> (m. AMSL)	<u>Antenna Radiation Center Height Above Average Terrain</u> (meters)	<u>Distance to 70 dBu Contour</u> (km)
0	871	39	14.4
45	966	-56*	12.7
90	1471	-561*	12.7
135	1046	-136*	12.7
180	666	244	34.8
225	317	593	53.1
251.8**	408	502	48.8
270	467	443	45.6
315	677	233	34.1
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Average	810.1	99.9	

\* An assumed height of 30 meters was used in determining the distance to the 70 dBu contour.

\*\* Radial through Green Acres -- not included in overall average.

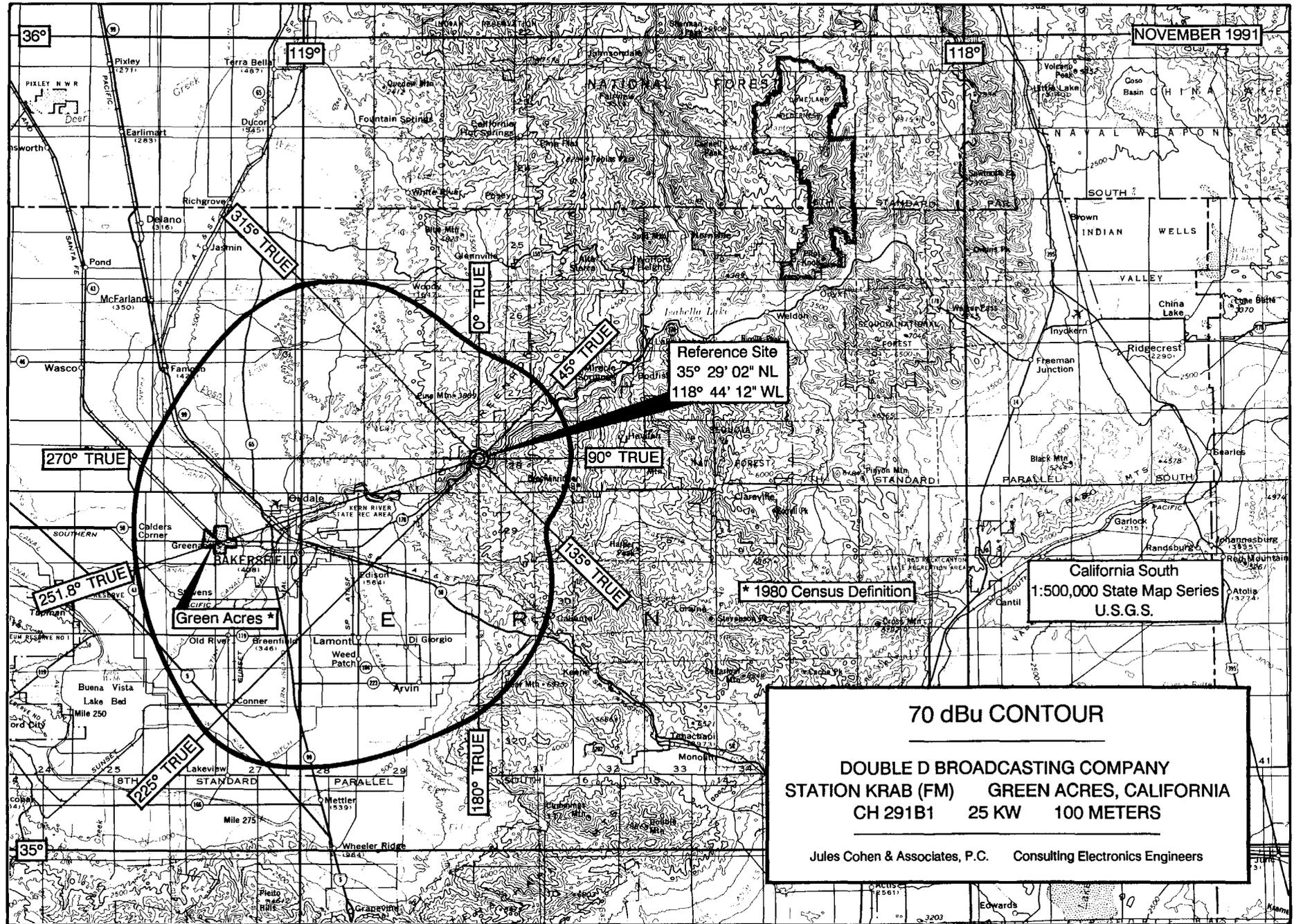


Figure 3