

~~PH 910211MB~~

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California
District of Columbia
New York
Oregon

SEP 30 3 10 PM '91

AL 4085

September 25, 1991

Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Suite 222
Washington, D.C. 20554

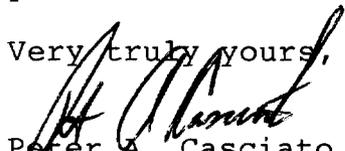
Re: Healdsburg Broadcasting, Inc. ("HBI")
BPH-910211MB, Applicant for a New FM
Radio Station on Channel 240A in
Healdsburg, CA

Dear Ms. Searcy:

Enclosed for filing are an original and three copies
of a Petition For Leave to Amend and Amendment
to the above-captioned application. Please return
the third copy, date-stamped, in the enclosed self-
addressed stamped envelope.

Should you have any questions concerning HBI,
please contact the undersigned.

Very truly yours,


Peter A. Casciato
Attorney for Healdsburg
Broadcasting, Inc.

enclosures

cc: Public File

PAC:sc

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

In re Application of)
Healdsburg Broadcasting, Inc.)
For A Construction Permit)
For A New FM Station on)
Channel 240A)
Healdsburg, California)

File No. BPH-910211MB

To: Chief, Mass Media Bureau

PETITION FOR LEAVE TO AMEND

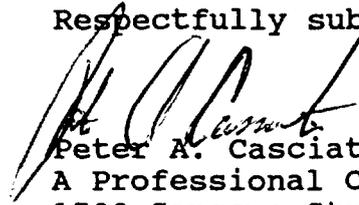
Healdsburg Broadcasting, Inc., applicant for a new FM radio station on channel 240A in Healdsburg, California, by its attorney, hereby petitions for leave to amend its application pursuant to Section 1.65 of the Commission's Rules.

The attached Amendment, reports a calculation error in the Section V-B engineering portion of the application by which applicant's engineer calculated the distance contours incorrectly using the Height of Radiation Center Above Average Terrain instead of the Height Above Mean Sea Level. Using the latter correct figure enlarges pertinent contours and requires modification of the applicant's directional antenna to limit radiation towards KKHI-FM to protect it for a short-spaced requirement of 8 kilometers in accordance with Sections 73.207 and 73.215 of the Commission's rules.

Applicant respectfully requests that it be granted leave to file the attached amendment to comply with Section 1.65 of the

Commission's rules.

Respectfully submitted,



Peter A. Casciato
A Professional Corporation
1500 Sansome Street Suite 201
San Francisco, CA 94111
(415) 291-8661

September 21, 1991

Counsel to
Healdsburg Broadcasting, Inc.

Healdsburg Broadcasting, Inc. Application
Amendment No. 2
Application No. BPH-910211MB
FM Radio Station on Channel 240A
Healdsburg, CA

Healdsburg Broadcasting, Inc. hereby amends its application to reflect the attached engineering information that identifies and corrects a calculation error in Section V-B of its application.

Date: September ²³, 1991



Michael Akana, President

STEPHEN C. PETERSEN, P.E.

CONSULTING ELECTRICAL ENGINEER

9629 ZAYANTE DRIVE

FELTON, CALIFORNIA 95018

PHONE OR FAX: 408-335-3115

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Engineering Statement

This statement identifies a calculation error reported in FCC Form 301, section V-B of the application of Healdsburg Broadcasting, Inc. ("HBI"), applicant for a new commercial FM facility on channel 240A, Healdsburg, CA. See BPH-910211MB filed February 11, 1991.

Due to a clerical error, the undersigned utilized the Height of Radiation Center Above Average Terrain 339 meters (See response to Question 7(b)(3) of HBI's original Section V-B date February 7, 1991) when calculating distance contours for HBI in its initial engineering statement. Instead, 509 meters, the Height Above Mean Sea Level (See response to Question 7(b)(2)), should have been utilized. As a result of this error, the incorrect 339 meter figure inaccurately depicted HBI's proposed antenna 170 meters lower than it actually is. In turn, this results in contour distances less than they would otherwise be if the correct number of 509 meters above mean sea level were used.

Both of these numbers, 339 and 509 meters (reported correctly by responses to question 7(b)(2) and 7(b)(3) in the original Form 301) are correct when used in their proper contexts. The unfortunate clerical error transposed their functions. The error was found during the process of certifying the beta version of a new computer program I recently developed

for streamlining the design, specification, contour calculations, etc. of FM and TV transmitting facilities. A particular feature of this program prevents this kind of error from occurring.

The attached engineering corrects pages 17 and 18 from section V-B, and provides corrected exhibits and maps for the continued use of a directional antenna, utilizing 509 meters Above Mean Sea Level. The actual antenna location and maximum ERP of 480 watts remain unchanged from the original engineering. Likewise, the antenna type, manufacture and location of HBI's transmitter site remain unchanged. The correction enlarges all pertinent contours and requires modification of the original directional antenna to limit radiation towards KKHI-FM to protect it for a short-spaced requirement of 8 kilometers in accordance with Sections 73.207 and 73.215 of the Commission's rules. The area within the 70 dBu contour increases from 1158 to 2000 Km², and the enclosed population from 84,399 to 90,301 persons (1980 census).

By *Stephen C. Petersen*
Stephen C. Petersen, P.E.
September 6, 1991

15. Attach as an Exhibit a 75 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction V. The map must further clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
5

16. Attach as an Exhibit *(name the source)* a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
6

(a) the proposed transmitter location, and the radials along which profile graphs have been prepared;

(b) the 3.16 mV/m and 1 mV/m predicted contours; and

(c) the legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. ml. = 259 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 2000 sq. km. Population 90,301

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
NA

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license.

19. Terrain and coverage data *(to be calculated in accordance with 47 C.F.R. Section 73.313)*

Source of terrain data: *(check only one box below)*

Linearly Interpolated 30-second database 75 minute topographic map

(Source: NOAA)

Other *(briefly summarize)*

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances	
		To the 316 mV/m contour (kilometers)	To the 1 mV/m contour (kilometers)
*			
0	271	14.1	25.1
45	397	17.1	30.2
90	438	17.2	30.4
135	444	10.6	19.3
180	343	11.3	20.1
225	388	16.9	29.9
270	345	16.0	28.2
315	83	7.8	13.8

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

20. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within Section 11807 of the FCC Rules, such that it may have a significant environmental impact? Yes No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 11811.

Exhibit No.
NA

If No, explain briefly why not.

See Engineering Statement, Exhibit-1

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) Stephen C. Petersen	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer
Signature	Address (Include ZIP Code) 9629 Zayante Drive Felton, CA 95018
Date September 6, 1991	Telephone No. (Include Area Code) (408) 335 - 3115

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, Section V-B, question 10, Antenna Data

Proposed Directional Antenna
Horizontal Plane Relative Field Azimuth Pattern

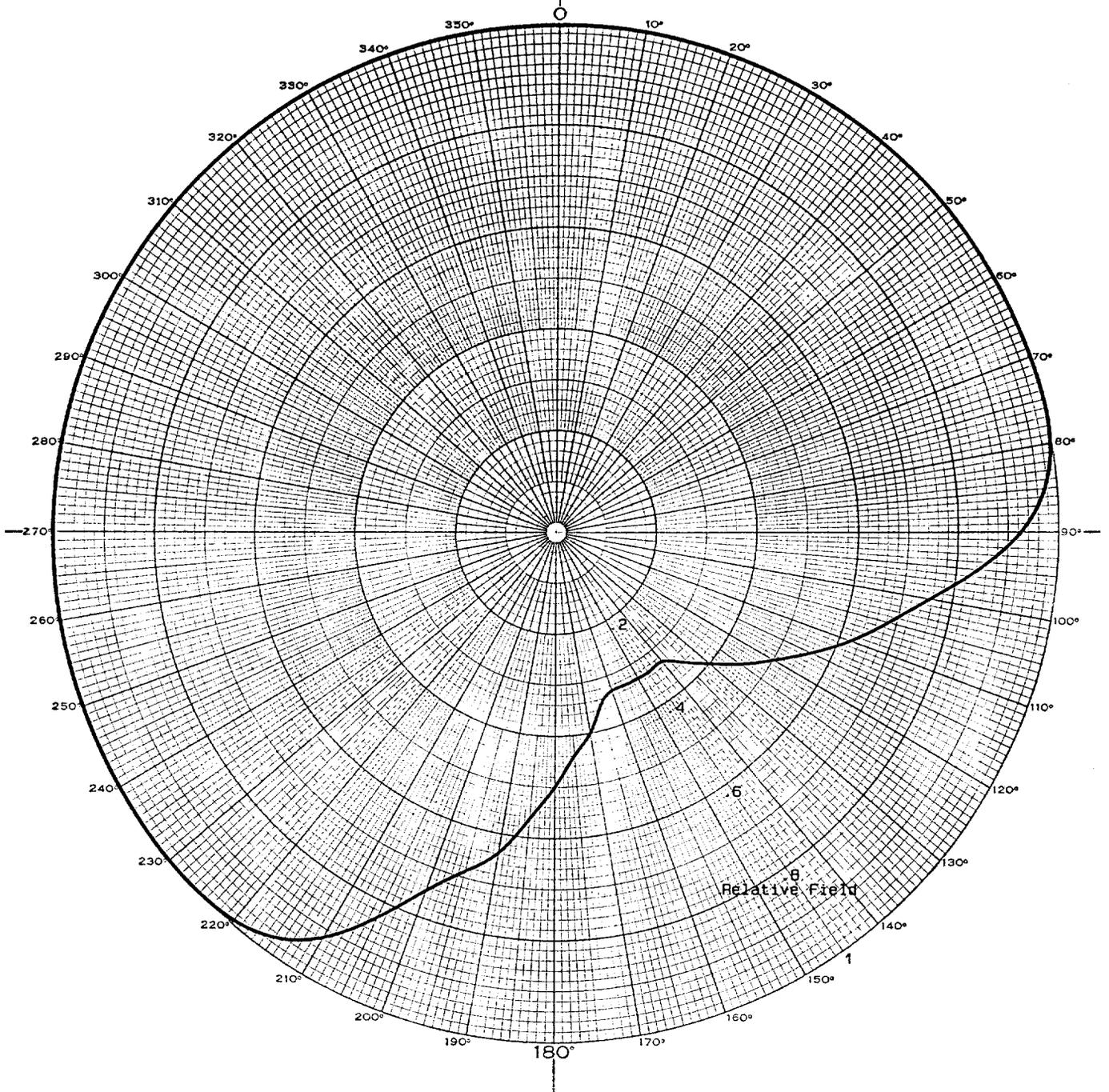
TYPE: Jampro JMPC, 2 Bay DA

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POLARIZATION: Circular

SEP 27 1991

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Healdsburg Broadcasting, Inc.
 Proposed Channel 240A, Healdsburg, CA
 FCC Form 340, Section V-B, question 10, Antenna Data

Horizontal Plane Relative Field Tabulation For Proposed Directional Antenna

Antenna Type: Jampro JMCP 2 Bay, DA
 Beam Tilt = 0.0 degree
 Polarization: Circular; maximum horizontal polarization tabulated

Azim	E-rel	dB-rel	Azim	E-rel	dB-rel	Azim	E-rel	dB-rel
0.0	1.000	0.000	5.0	1.000	0.000	10.0	1.000	0.000
15.0	1.000	0.000	20.0	1.000	0.000	25.0	1.000	0.000
30.0	1.000	0.000	35.0	1.000	0.000	40.0	1.000	0.000
45.0	1.000	0.000	50.0	1.000	0.000	55.0	1.000	0.000
60.0	1.000	0.000	65.0	1.000	0.000	70.0	1.000	0.000
75.0	1.000	0.000	80.0	1.000	0.000	85.0	0.970	-0.265
90.0	0.920	-0.724	95.0	0.840	-1.514	100.0	0.750	-2.499
105.0	0.680	-3.350	110.0	0.620	-4.152	115.0	0.560	-5.036
120.0	0.500	-6.021	125.0	0.450	-6.936	130.0	0.750	-7.959
135.0	0.360	-8.874	140.0	0.330	-9.630	145.0	0.330	-9.630
150.0	0.330	-9.630	155.0	0.330	-9.630	160.0	0.330	-9.630
165.0	0.350	-9.119	170.0	0.400	-7.959	175.0	0.440	-7.131
180.0	0.500	-6.021	185.0	0.565	-4.959	190.0	0.640	-3.876
195.0	0.690	-3.223	200.0	0.750	-2.499	205.0	0.830	-1.618
210.0	0.920	-0.724	215.0	0.970	-0.265	220.0	1.000	0.000
225.0	1.000	0.000	230.0	1.000	0.000	235.0	1.000	0.000
240.0	1.000	0.000	245.0	1.000	0.000	250.0	1.000	0.000
255.0	1.000	0.000	260.0	1.000	0.000	265.0	1.000	0.000
270.0	1.000	0.000	275.0	1.000	0.000	280.0	1.000	0.000
285.0	1.000	0.000	290.0	1.000	0.000	295.0	1.000	0.000
300.0	1.000	0.000	305.0	1.000	0.000	310.0	1.000	0.000
315.0	1.000	0.000	320.0	1.000	0.000	325.0	1.000	0.000
330.0	1.000	0.000	335.0	1.000	0.000	340.0	1.000	0.000
345.0	1.000	0.000	350.0	1.000	0.000	355.0	1.000	0.000

Notes:

1. Tabulation is based on Jampro Corp. supplied data with fields specified every 10.0 degrees, beginning with 0.0 degrees; 45, 135 also specified. Intermediate quantities are interpolated with a cubic spline to produce a smooth curve.

2. Maximum horizontal polarization specified: V-pol less than or equal to H-pol. Final data

August 24, 1991

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, Section V-B, question 13, Allocation Study

Calculated Distances to Proposed Service and Interference Contours
N 38-32-24, W 122-57-39

Azim (deg)	E-rel (V/V)	Radial (W)	ERP (dBk)	Radial		CONTOUR DISTANCES (Km)		
				AE(m)	Haat(m)	F[5050] 60dBu	70dBu	F[5010] 48dBu
0.0	1.000	480.0	-3.188	238	271	25.1	14.1	51.9
15.0	1.000	480.0	-3.188	162	347	28.3	16.0	58.2
30.0	1.000	480.0	-3.188	135	374	29.4	16.6	60.5
45.0	1.000	480.0	-3.188	112	397	30.2	17.1	62.3
60.0	1.000	480.0	-3.188	123	386	29.8	16.9	61.5
75.0	1.000	480.0	-3.188	91	418	30.9	17.6	63.4
90.0	0.920	406.3	-3.912	71	438	30.4	17.2	62.1
105.0	0.680	222.0	-6.573	67	442	26.3	14.8	55.1
120.0	0.500	120.0	-9.208	82	427	22.3	12.5	47.5
125.0	0.450	97.2	-10.123	74	435	21.4	11.9	45.4
130.0	0.400	76.8	-11.146	71	438	20.2	11.2	43.0
135.0	0.360	62.2	-12.062	65	444	19.3	10.6	41.0
140.0	0.330	52.3	-12.817	70	439	18.4	10.0	39.1
145.0	0.330	52.3	-12.817	76	433	18.3	10.0	38.9
150.0	0.330	52.3	-12.817	78	431	18.2	9.9	38.8
155.0	0.330	52.3	-12.817	95	414	17.9	9.8	38.3
160.0	0.330	52.3	-12.817	111	398	17.5	9.6	37.7
165.0	0.350	58.8	-12.306	143	366	17.4	9.6	37.1
170.0	0.400	76.8	-11.146	157	352	18.2	10.2	38.7
175.0	0.440	92.9	-10.319	160	349	19.1	10.7	40.4
180.0	0.500	120.0	-9.208	166	343	20.1	11.3	42.6
185.0	0.565	153.2	-8.147	177	332	21.1	11.8	44.3
190.0	0.640	196.6	-7.064	188	321	22.0	12.4	46.1
195.0	0.690	228.5	-6.411	164	345	23.6	13.3	49.7
200.0	0.750	270.0	-5.686	161	348	24.7	13.9	51.8
210.0	0.920	406.3	-3.912	137	372	28.1	15.9	58.4
225.0	1.000	480.0	-3.188	121	388	29.9	16.9	61.6
240.0	1.000	480.0	-3.188	201	308	26.6	15.1	54.9
255.0	1.000	480.0	-3.188	243	266	24.8	14.0	51.4
270.0	1.000	480.0	-3.188	164	345	28.2	16.0	58.0
285.0	1.000	480.0	-3.188	233	276	25.3	14.2	52.3
300.0	1.000	480.0	-3.188	287	222	22.8	12.8	47.4
315.0	1.000	480.0	-3.188	426	83	13.8	7.8	29.1
330.0	1.000	480.0	-3.188	324	185	21.0	11.7	43.2
345.0	1.000	480.0	-3.188	258	251	24.2	13.6	50.2



**PROPOSED 240A
Healdsburg**

**PROPOSED
60 dBu F5050**

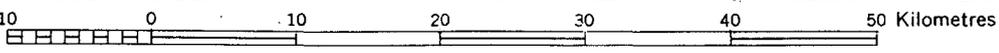
**PROPOSED
48 dBu F5010**

**KKHI
54 dBu F5010**

**KKHI
54 dBu F5050**

**SAN FRANCISCO KKHI 239B
San Francisco
BLH-850128LM**

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, question 13, Allocation Study
Map showing Protected and Interference Contours
To and From KKHI, San Francisco



Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, question 16

Exhibit-6, page 1
August 24, 1991

Proposed Coverage Contours
N 38-32-24, W 122-57-39

Map: USGS Western United States 1:250,000 (reduced) Santa Rosa

Proposed
60 dBu F5050

Proposed
70 dBu F5050

Area Within Proposed 60 dBu Contour = 2000 Km²
Enclosed Population = 90,301 persons

