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**C HOWARD MCDONALD**  
BIG M Broadcast Services

**ORIGINAL  
FILE**

Programming  
FCC Applications

Engineering  
Station Acquisition

RECEIVED June 1992

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The Secretary  
Federal Communications Commission  
Washington DC 20554

JUL 11 1992

**JUL - 9 1992**

FCC MAIL BRANCH

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Secretary,

Enclosed is a petition for rulemaking (5copies) on behalf of my client,  
LIBERTY EDUCATIONAL FOUNDATION of Spokane, Washington, an educational,  
not-for-profit institution.

**ORIGINAL  
FILE**

Because the petitioner is non-commercial educational seeking a non-  
commercial educational facility, there should be no filing fee needed  
to expedite this petition.

I trust you will find everything in proper order.

Sincerely,

*C Howard McDonald*  
C Howard McDonald  
BIG M Broadcast Services  
P.O. Box 807  
Veradale WA 99037

CHM/jmm

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JUL - 9 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PETITION TO AMEND  
FCC TABLE OF ASSIGNMENTS  
(SECTION 73.202)

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JUL 8 1992  
FCC MAIL BRANCH

REALLOCATING FM CHANNEL 272A  
FROM COEUR D'ALENE, IDAHO  
TO POST FALLS, IDAHO

AND

DESIGNATE THE CHANNEL  
EDUCATIONAL

LIBERTY EDUCATIONAL FOUNDATION  
c/o C Howard McDonald, Technical Director  
Post Office Box 807  
VERADALE WA 99037  
509-456-0768

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D. C.

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JUL - 9 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

29 June 1992

IN THE MATTER OF:

A petition for rulemaking filed by the LIBERTY )  
EDUCATIONAL FOUNDATION of Spokane, Washington, )  
seeking the reallocation of FM channel 272 A to )  
Post Falls, Idaho from Coeur d'Alene, Idaho, and )  
the re-designation of the channel as educational )  
plus opening a window for applicants. )

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JUL 8 1992

FCC MAIL BRANCH

TO THE COMMISSION:

Channel 272A (102.3 MHz) was originally assigned to Coeur d'Alene, Idaho in 1982. In September of that year application was made for the channel and a construction permit was granted along with the call letters KETB (file Number 820927AG). Station KETB was never built, mainly due to problems associated with securing a transmitter site that would meet standard FCC co-channel and adjacent channel separation requirements.

The last owner of the KETB permit, Communications Group, Inc. of Saint Anthony, Idaho, lost access to a site at 47° 39' 50" north latitude and 116° 53' 57" west longitude and was unable to obtain another site that met the Commission's requirements for proper separation from a first adjacent allocation at Sandpoint, Idaho (channel 273) and a co-channel allocation at Colfax, Washington.

Recently, the Commission approved a petition to substitute channel 270 (101.9 MHz) for channel 237 (95.3 MHz) at Medical Lake, Washington, blocking an effort by Communications Group, Inc. and others to substitute channel 271 for 272 at Coeur d'Alene.

In January 1988, a request for extension of time to construct KETB was denied by the Commission and the construction permit and call letters were deleted.

The petitioner in this matter has been unable to locate any notice of reinstatement of the CP for KETB by the Commission and the window for channel 272 has not been reopened.

In 1991 the Commission modified the Table of Allotments to permit KRAO at Colfax, Washington to relocate to channel 273 (102.5 MHz) and classified the new assignment as C3. This eliminated the co-channel spacing problems associated with channel 272 at Coeur d'Alene.

An allocation study by the petitioner (Exhibit One) shows that if channel 272 is reassigned to Post Falls, Idaho and a transmitter site at or near  $47^{\circ} 39' 35''$  North and  $116^{\circ} 57' 12''$  West is specified, all spacing requirements will be satisfied and channel 272 could be classified as a full Class A allocation with no short-spacing problems.

THEREFORE:

The petitioner, LIBERTY EDUCATIONAL FOUNDATION, requests the three actions by the Commission:

1. Assign channel 272A to Post Falls, Idaho. Post Falls is the community closest to the site specified above. Post Falls would certainly lie within the 3.16 mv/m contour of any proposed FM station at that location. In addition, there are no FM or TV channels allocated to Post Falls. At present there are three radio stations serving neighboring Coeur d'Alene and over 30 stations in the Spokane WA-Coeur d'Alene ID metro area.
2. Specify channel 272 as a Non-commercial/Educational allocation. Due to the close proximity of Post Falls to channel 6 (KHQTV) at Spokane, any proposed NCE/FM operating in the 88 to 92 MHz

portion of the FM band would present potential interference to channel 6 (KHQTV). An NCE/FM at 102.3 MHz would offer no interference potential. Also, there are no NCE/FM stations licensed to Post Falls or Coeur d'Alene and the educational portion of the band is very crowded. There is little possibility for an NCE/FM between 88 and 92 MHz even if channel 6 interference potential could be overcome.

3. Open a window for channel 272 for any potential applicants who qualify as educational entities.

5/29/92

Date

C Howard McDonald

C Howard McDonald  
Technical Advisor for  
LIBERTY EDUCATIONAL FOUNDATION  
Spokane WA

C Howard McDonald  
BIG M Broadcast Services  
Post Office Box 807  
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PREFACE TO EXHIBIT ONE

The attached allocation study (Exhibit One) shows all pertinent Channel allocations as they relate to channel 272A at Post Falls ID

Distances between locations have been determined by using FCC approved charts and methods and are calculated to the nearest kilometer.

In all instances separation requirements are in excess of minimum distance standards allowed between USA assignments as well as Canadian allocations.

In the several cases of vacant channel allocations, the geographical co-ordinates of the city of assignment was used, according to FCC rules. In calculating distances from existing stations and construction permits the actual transmitter site co-ordinates were used, except for Davenport, Washington where city co-ordinates were used because co-ordinates for the KZQB permit were unobtainable.

Both required IF separation requirements (10.6 and 10.8 MHz) exceed prescribed limits by considerable distances.

EXHIBIT ONE

Separation Required (km)	Actual Separation (km)	Co-ordinates	Remarks
31	132	48 22 14 115 32 19	(2)
37	207	49 28 0 117 30 0	(1)
76	309	49 12 0 113 18 0	(1)
42	47	47 34 0 117 34 06	(2) Cp from 95.3
165	165	47 16 28 120 25 30	(2)
177	422	51 03 54 114 12 47	(1)
85	254	49 46 46 118 4 0	(1)
-	-	47 39 35 116 57 12	(2)
206	220	49 27 30 115 37 45	(1)
132	184	49 0 39 118 23 25	(1)
89	99	46 48 38 117 20 34	(2) CP from 102.3
72	74	48 15 22 116 30 46	(2)
165	248	46 47 49 114 0 59	(2)
72	115	47 39 06 118 9 06	(2) Used city Co-ords (2) KZQB co-ords n/a
85	192	49 19 0 117 40 0	(1)
95	241	46 05 47 119 11 36	(2)
100	149 to Canada border	49 0 0	(1) Distance to border exceeds separation
95	149 to Canada Border	49 0 0	(2) requirements A to C

10.6.10.8 IF Separation

102.3 + 10.6	112.9	outside FM band
102.3 + 10.8	113.1	outside FM band
102.3 - 10.6	91.7	No assignment
102.3 - 10.8	91.5	within limits of 29 km

Allocation study  
 102.3 MHz (channel 272)  
 Post Falls ID

47° 39' 35"  
 116° 57' 12"

Channel #	mHz	Adjacent channels	Status	Nearest Assignment	Class to class relation
269	101.7	-600 kHz	KTNY	Libby	MT RECEIVED A
			vacant	Bonnington Falls	BC A to A
270	101.9	-400	vacant	Cardston	AB JUI 8 1992 A to B
			KAAR	Medical Lake	WA FOG MAIL BRANCH A to C3
271	102.1	-200	KPQFM	Wenatchee	WA A to C
			CBRFM	Calgary	AB A to C
			vacant	Edgewood	BC A to A
272	102.3	co-channel	POST FALLS ID REQUESTED ALLOTMENT		
			vacant	Cranbrook	BC A to B
			vacant	Grand Forks	BC A to A
273	102.5	+200	KRAO (CP)	Colfax	WA A to C3
			KJDE (CP)	Sandpoint	ID A to A
			KMSO	Missoula	MT A to C
			KZQB (CP)	Davenport	WA A to A
			vacant	Castlegar	BC A to A
274	102.7	+400	KORDFM	Richland	WA A to C
275	102.9	+600			(3) A to C (Canada)
					(4) A to C (USA)

- (1) Section 73.207 (b) (2)
- (2) Section 73.207 (b) (1)
- (3) No Canadian allotment within minimum separation requirements
- (4) No USA allotment within minimum separation requirements