

BEFORE THE

ATTN: Chief, Media Bureau

Bustos Media Holdings, LLC, licensee of FM Broadcast Station KZSZ, 107.5 MHz, Channel 298B, Colusa, California, pursuant to Section 1.420(d) of the Commission's Rules, 47 C.F.R. §1.420(d), hereby respectfully submits this Petition for Rulemaking to amend the FCC's FM Table of Allotments, 47 C.F.R. §73.202(b) as follows:

In support whereof, the following is shown:

Preliminary Statement

1. This Petition for Rulemaking is feeable; we are filing this through the Commission's ECFS system, and will attempt to submit a credit card payment through the "fee filer" system. As Section 1.420(d) requires that the petition "be accompanied by" an FCC Form 301 application, we have filed said application for a minor change for station KZSZ to move from Channel 298 at Colusa to Channel 300 at Robbins, California electronically and have paid the required filing fee for said Form 301 application; the file number is BPH-20190808ABF. A PDF copy of the electronic Form 301 application is attached hereto as Exhibit A.

2. In the event that the changes to the FM Table of Allotments proposed herein are authorized and the accompanying FCC Form 301 application is granted, Bustos Media Holdings, LLC certifies that it will construct the authorized changes and file an FCC Form 302-FM application to re-license KZSZ at Robbins, California on Channel 300.

Proposed Changes in FM Table of Allotments

3. Bustos is filing this Petition in the aftermath of the cancellation of the license of former FM Broadcast Station KDND, 107.9 MHz, Channel 300B, Sacramento, California. Bustos believes that the objectives of Section 307(b) of the Communications Act of 1934, as amended, would be best served by a first local aural

service at Robbins, California, a Census Designated Place outside all urbanized areas in Sutter County, California.

4. To effectuate this proposal, we propose the deletion of mutually-exclusive Channel 298 at Colusa, California. Colusa has a July 1, 2018 Census estimated population of 5,911, 60 persons less than its 2010 Census population of 5,971. Colusa would continue to be served by FM Broadcast Station KKCY, 103.1 MHz, Channel 276A.

5. As the use of Channel 300A at Robbins, California would be mutually-exclusive with the allocation of Channel 300B at Sacramento, California, we hereby request that the Commission delete from its FM Table of Allotments the allocation of Channel 300B at Sacramento, California. Sacramento is the city of license of eight other allocated FM channels, four non-commercial educational FM stations, and six AM Broadcast Stations (see Exhibit B, a list of existing licensed aural broadcast stations at Sacramento).

6. Assuming that the Commission deletes Channel 298 at Colusa and Channel 300 at Sacramento, the use of Channel 300A at Robbins, California by a relocated KZSZ(FM) would comply with all applicable Commission technical rules. Mr. Youngers' calculations appear in Exhibit 36 to the FCC Form 301 application attached hereto as Exhibit A.

7. Mr. Youngers has calculated the following data in connection with this Petition for Rulemaking:

a. If new technical facilities are proposed, the area and population with the proposed 70 dBu and 60 dBu contours of the station: In this case, the population within the current contours of the allotment at Colusa is: 70 dBu: 30,019 persons and an area of 3,534.3 sq. km, 60 dBu: 155,783 persons and an area of 8,369.9 sq. km. The new proposed contours for the allotment at Robbins will be: 70 dBu: 568 persons and an area of 338.0 sq. km, 60 dBu: 5,357 persons and an area of 1,073.1 sq. km.

b. The number of stations licensed to the proposed new community of license: There is no commercial AM, FM or TV station licensed to Robbins, California. This will be the community's first local service.

c. The number of stations providing protected service to the proposed community of license: There are 16 commercial and 1 noncommercial FM stations that cover the new community with 60 dBu service or greater. There are 27 AM stations that cover the new community with 0.5 mV/m coverage or greater.

d. The population, according to the latest Census Data, of the proposed community of license: In this case, the CDP of Robbins, California, has a population of 323 according to the 2010 U.S. Census data.

8. With respect to the Commission's policies concerning broadcast stations located in rural areas, Mr. Youngers has determined that at present, KZSZ(FM) does not provide any predicted 60 dBu contour serves to any area within a United States Census Bureau-defined "Urbanized Area". With respect to the proposed area to be served by KZSZ(FM) as a Robbins, California station, the predicted 60 dBu contour would encompass 0% of the Yuba City-Marysville, California Census-defined "Urbanized Area", and would not encompass any portion of the Sacramento "Urbanized Area".

9. Robbins, California is an unincorporated community but has been determined by the United States Census Bureau to be a "Census Designated Place" with a 2010 population of 323. It is served by California Highway 113. Robbins has a post office, zip code 95676. It has a fire station (volunteer fire department) and an elementary school, Robbins Elementary School. A list of businesses located at Robbins is attached hereto as Exhibit C.

10. The Commission has determined that census designated places are "communities" for purposes of Section 307(b). It is respectfully submitted that a first local aural broadcast service at Robbins, California would better serve the objectives of Section 307(b) than would the provision of a nineteenth local aural service at Sacramento.

Conclusion

WHEREFORE, it is urged that the Petition for Rulemaking BE GRANTED and that the public interest, convenience and necessity would be well served by the allocation of FM Channel 300A at Robbins, California.

Respectfully submitted,

BUSTOS MEDIA HOLDINGS, LLC

A handwritten signature in black ink, appearing to read "D. Kelly", written over a horizontal line.

By _____
Dennis J. Kelly
Its Attorney

LAW OFFICE OF DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018
Telephone: 202-293-2300
E-mail: dkellyfcclaw1@comcast.net

DATED: August 8, 2019

NOTE: As the license for former station KDND was turned in for cancellation over one year ago, there is no known party that would be affected by the deletion of Channel 300B at Sacramento upon whom we would otherwise be required to serve a copy of this Petition for Rulemaking.

EXHIBIT A

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0027 (July 2011)	FOR FCC USE ONLY
FCC 301		FOR COMMISSION USE ONLY FILE NO. - 20190808ABF
APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION		
Read INSTRUCTIONS Before Filling Out Form		

Section I - General Information

1. Legal Name of the Applicant BUSTOS MEDIA HOLDINGS, LLC Mailing Address 5110 S. E. STARK STREET		
City PORTLAND	State or Country (if foreign address) OR	ZIP Code 97215 -
Telephone Number (include area code) 5032335280	E-Mail Address (if available) ABUSTOS@BUSTOSMEDIA.COM	
FCC Registration Number: Call Sign 0003745494 KZSZ	Facility ID Number 51638	
2. Contact Representative (if other than Applicant) DENNIS J. KELLY Mailing Address POST OFFICE BOX 41177		
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20018 - 0577
Telephone Number (include area code) 2022932300	E-Mail Address (if available) DKELLYFCCLAW1@COMCAST.NET	
3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
4. Application Purpose <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application (a) File number of original construction permit: (b) Service Type: (c) Community of License: City: ROBBINS (d) Facility Type </div> <div style="width: 48%;"> <input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments <input type="radio"/> Major Change in licensed facility <input checked="" type="radio"/> Minor Change in licensed facility <input type="radio"/> Minor Amendment to pending application - <input type="checkbox"/> NA <input type="radio"/> AM <input checked="" type="radio"/> FM State: CA <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary </div> </div>		

[Exhibit 1]

If an amendment, **submit as an Exhibit** a listing by Section and Question Number the portions of the pending application that are being revised.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1.	Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Parties to the Application. a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.	
	(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.	(2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt).
	[Enter Parties/Owners Information]	
	b. Applicant certifies that equity and financial interests not set forth above are non-attributable.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 2]
3.	Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.	<input type="checkbox"/> N/A [Exhibit 3]
4.	Multiple Ownership.	
	a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application? If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.	<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 4]
	b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 5]

	<p>Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p> <p>All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p>	
c.	<p>Applicant certifies that the proposed facility:</p> <p>(1) does not present an issue under the Commission's policies relating to media interests of immediate family members;</p> <p>(2) complies with the Commission's policies relating to future ownership interests; and</p> <p>(3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 6]</p>
d.	<p>Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. § 121-201), and holds:</p> <p>(1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or</p> <p>(2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or</p> <p>(3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?</p> <p>All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>See Explanation in [Exhibit 7]</p>
5.	<p>Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <p>a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or</p> <p>b. any pending broadcast application in which character issues have been raised.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 8]</p>
6.	<p>Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 9]</p>
7.	<p>Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 10]</p>
8.	<p>Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
9.	<p>Local Public Notice. Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
10.	<p>Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112 (b), if applicable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p> <p>[Exhibit 11]</p>

	An exhibit is required unless this question is inapplicable.	
11.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
12.	Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
13.	Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments. If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
14.	Tribal Priority - Threshold Qualifications. Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 12]

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing AMADOR S. BUSTOS	Typed or Printed Title of Person Signing PRESIDENT/MANAGER
Signature	Date 8/8/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Section III-B - FM Engineering	
TECHNICAL SPECIFICATIONS	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
TECH BOX	
1.	Channel Number: 300
2.	Class (select one): <input checked="" type="radio"/> A <input type="radio"/> B1 <input type="radio"/> B <input type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C <input type="radio"/> D
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 38 Minutes 55 Seconds 27 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 121 Minutes 48 Seconds 1 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Proposed Allotment or Assignment Coordinates: (NAD 27) <input type="checkbox"/> Not Applicable

Latitude: Degrees 38 Minutes 55 Seconds 27 <input checked="" type="radio"/> North <input type="radio"/> South												
Longitude: Degrees 121 Minutes 48 Seconds 1 <input checked="" type="radio"/> West <input type="radio"/> East												
5.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
6.	Overall Tower Height Above Ground Level:								46meters			
7.	Height of Radiation Center Above Mean Sea Level:								58 meters(H)		58 meters(V)	
8.	Height of Radiation Center Above Ground Level:								44.7meters(H)		44.7meters(V)	
9.	Height of Radiation Center Above Average Terrain:								44.7meters(H)		44.7meters(V)	
10.	Effective Radiated Power:								4 kW(H)		4 kW(V)	
11.	Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable (Beam-Tilt Antenna ONLY)								kW(H)		kW(V)	
12.	Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) Rotation (Degrees): <input type="checkbox"/> No Rotation											
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	
0		10		20		30		40		50		
60		70		80		90		100		110		
120		130		140		150		160		170		
180		190		200		210		220		230		
240		250		260		270		280		290		
300		310		320		330		340		350		
Additional Azimuths												

[Relative Field Polar Plot](#)

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

13.	Availability of Channels. The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 27]
14.	Community Coverage. The proposed facility complies with 47 C.F.R. Section 73.315.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 28]
15.	Main Studio Location. The proposed main studio location complies with 47 C.F.R. Section 73.1125.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 29]
16.	Interference. The proposed facility complies with all of the following applicable rule sections: Check all those that apply:	<input checked="" type="radio"/> Yes <input type="radio"/> No

		See Explanation in [Exhibit 30]
	Separation Requirements. <input checked="" type="checkbox"/> a) 47 C.F.R. Section 73.207	
	Grandfathered Short-Spaced. <input type="checkbox"/> b) 47 C.F.R. Section 73.213(a) with respect to station(s): [Exhibit 31] Exhibit required <input type="checkbox"/> c) 47 C.F.R. Section 73.213(b) with respect to station(s): [Exhibit 32] Exhibit required <input type="checkbox"/> d) 47 C.F.R. Section 73.213(c) with respect to station(s): [Exhibit 33] Exhibit required.	
	Contour Protection <input type="checkbox"/> e) 47 C.F.R. Section 73.215 with respect to station(s): [Exhibit 34] Exhibit required.	
17.	Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required. By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 35]
18.	Community of License Change - Section 307(b). If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of station assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)). An exhibit is required unless this question is not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A [Exhibit 36]
PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.		

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name KEVIN J. YOUNGERS	Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT
Signature	Date 8/8/2019
Mailing Address 3004 - 70TH AVENUE	

City GREELEY	State or Country (if foreign address) CO	Zip Code 80643 -8970
Telephone Number (include area code) 9703028444	E-Mail Address (if available) KEVINYOUNGERS@COMCAST.NET	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 5

Description: MULTIPLE OWNERSHIP RULE COMPLIANCE

KZSZ(FM) PROPOSES TO RELOCATE TO ROBBINS, CA, WHICH IS IN SUTTER COUNTY, CALIFORNIA. THIS WILL BE BUSTOS MEDIA HOLDINGS, LLC'S ONLY PRIMARY BROADCAST STATION IN SUTTER COUNTY; KZSZ(FM) WILL NOT HAVE CITY-GRADE CONTOUR OVERLAP WITH ANY OTHER STATION LICENSED TO BUSTOS MEDIA HOLDINGS, LLC.

THEREFORE, THIS APPLICATION DOES NOT IMPLICATE THE FCC'S MULTIPLE OWNERSHIP RULE, 47 CFR SEC. 73.3555(A).

Attachment 5

Exhibit 7

Description: EXPLANATION

BUSTOS MEDIA HOLDINGS, LLC MEETS THE SMALL BUSINESS ADMINISTRATION DEFINITION FOR 'ELIGIBLE ENTITY'; HOWEVER, ITS STATUS AS 'ELIGIBLE ENTITY' DOES NOT APPEAR TO BE RELEVANT TO THIS TRANSACTION.

Attachment 7

Exhibit 12

Description: STATEMENT CONCERNING QUESTION 13

WE RECEIVED THE FOLLOWING ERROR MESSAGE WHEN WE TRIED TO ANSWER QUESTION 13 IN THE AFFIRMATIVE: SECTION II, QUESTION 13, PETITION FOR RULEMAKING/COUNTERPROPOSAL TO ADD NEW FM CHANNEL TO FM TABLE OF ALLOTMENTS MUST BE ANSWERED 'NO' OR 'N/A' IN ORDER TO FILE VALUE IS: Y

A PETITION FOR RULEMAKING IS BEING FILED AS SOON AFTER THE FILING OF THIS APPLICATION AS POSSIBLE TO DELETE CHANNEL 298A FROM COLUSA, CA AND ALSO CHANNEL 300B FROM SACRAMENTO, CALIFORNIA, AND ADD CHANNEL 300A AT ROBBINS, CALIFORNIA. BUSTOS MEDIA HOLDINGS, LLC CERTIFIES THAT IF CHANNEL 300A IS ADDED AT ROBBINS, CA AND THIS APPLICATION IS GRANTED, BUSTOS WILL CONSTRUCT THE CHANGED AUTHORIZED THROUGH THIS APPLICATION AND TO FILE A FORM 302-FM APPLICATION TO RELICENSE KZSZ(FM) AT ROBBINS, CA.

Attachment 12

Exhibit 30

Description: TECHNICAL SHOWING

ATTACHED ARE THE FOLLOWING:

1. TECHNICAL STATEMENT
2. FIGURE 1: ALLOTMENT CHANNEL SPACING
3. FIGURE 2: SITE CHANNEL SPACING
4. FIGURE 3: 70 DBU COVERAGE OF ROBBINS, CA

Attachment 30

Description
TECHNICAL STATEMENT
FIGURE 1: ALLOTMENT CHANNEL SPACING
FIGURE 2: SITE CHANNEL SPACING
FIGURE 3: 70 DBU COVERAGE OF ROBBINS, CA

Exhibit 35

Description: ENVIRONMENTAL COMPLIANCE

SEE ATTACHED EXHIBIT.

Attachment 35

Description
ENVIRONMENTAL COMPLIANCE

Exhibit 36

Description: COMMUNITY OF LICENSE CHANGE EXHIBITS

A PETITION FOR RULEMAKING IS TO BE FILED THROUGH THE FCC'S ECFS FILING SYSTEM AS SOON AS POSSIBLE AFTER THE FILING OF THIS APPLICATION THROUGH THE CDBS SYSTEM ON AUGUST 8, 2019.

WE ATTACH THE FOLLOWING:

1. NARRATIVE STATEMENT
2. FIGURE 1: KZSZ COLUSA, CA CURRENT LICENSED OTHER SERVICES
3. FIGURE 2: KZSZ ROBBINS, CA LICENSED OTHER SERVICES

Attachment 36

Description
NARRATIVE STATEMENT
FIGURE 1: KZSZ COLUSA, CA CURRENT LICENSED OTHER SERVICES
FIGURE 2: KZSZ ROBBINS, CA LICENSED OTHER SERVICES

EXHIBIT 30
TECHNICAL STATEMENT
KZSZ ROBBINS, CALIFORNIA 300A
BUSTOS MEDIA HOLDINGS, LLC
FCC FORM 301
AUGUST 2019

This technical statement is in support of an FCC long form 301 application by Bustos Media Holdings, LLC for a minor change to KZSZ changing the class, channel, and the City of License. KZSZ will change from 298B Colusa, California on 300A Robbins, California. The facility ID is 51638.

The minor change of the city of license is pursuant to the current FCC rules. Bustos Media Holdings, LLC believes this application for a city change is pursuant to the current FCC rules while providing the most efficient usage of spectrum.

The proposed new community, Robbins, California, does not have an AM, FM or TV station authorized to it, and, therefore, it will be the community's first local service. Colusa will continue to enjoy first local service from KKCY and will continue enjoying a service level of 5 FM's, and 19 AM's. Robbins will have a service level of 18 FM's and 27 AM's, including its first local service.

Aural service for the coverage area of the licensed KZSZ at Colusa on channel 298B will not create any white or gray area. 3rd through 5th service areas will change by less than 0.5%. The 2010 census population of Colusa was 5,971, which is less than 7,500.

1st through 5th aural service for the coverage area of the application for KZSZ at Robbins on channel 300A will not change, except Robbins will have its first local service.

The public interest supports a change of allotments from Colusa, which will remain at its current service level, to Robbins, which will benefit from its first local service.

Figure 1 is a channel spacing study for 300A from the allotment point northwest of Robbins at the coordinates of N. 38°-55'-27", W. 121°-48'-01". This allotment point is within the 16.2 kilometers (refer to violet circle) of all of Robbins as allowed for allotment of a class A channel to a community and is fully spaced to all of the pertinent stations under 73.207 of the commission's rules. In the first line there is an apparent short spacing to DDKDND, the former KDND facility. The licensee, Entercom License, LLC, discontinued operations on February 8, 2017 and has turned in its license. The Commission adopted an order on July 3, 2019. A petition by Bustos Media Holdings, LLC to change this allotment is being filed concurrently.

There is also an apparent short spacing in the second line of the table to another record for KZSZ, which will be eliminated by the change proposed in this application. Figure 1 also shows the 70 dBμ predicted (F50,50) contour (refer to red contour) from the allotment point (6 kW ERP at 100 meters HAAT) would place the required 70 dBμ coverage over the entire community of Robbins.

Figure 2 is a channel spacing study for 300A from the proposed transmitter site which is northwest of Robbins at the coordinates of N. 38°-55'-27", W. 121°-48'-01". The proposed facility will operate at an RCAMSL of 58 meters, HAAT of 44.7 meters, and with an ERP of 4 kW. Once again, in the first line there is an apparent short spacing to DDKDND, the former KDND facility, which has been cancelled. The licensee, Entercom License, LLC, discontinued operations on February 8, 2017 and has turned in

its license. The Commission adopted an order on July 3, 2019. There is also an apparent short spacing in the second line of the table to another record for KZSZ, which will be eliminated by the change proposed in this application. Figure 2 also shows that the proposed operation of KZSZ will be separated to all other stations as required under 73.207.

Figure 3 shows that the 70 dB μ predicted F(50,50) contour from the proposed facility provides coverage over all of Robbins.

The new allotment of KZSZ to Robbins, California on 300A will not allow a minor change to place a principle community signal, in this case the 70 dB μ contour, over more than 50% of any 2010 census urbanized area. The only 2010 Census urbanized areas that are near are Yuba City, CA to the north and Sacramento, CA to the southeast.

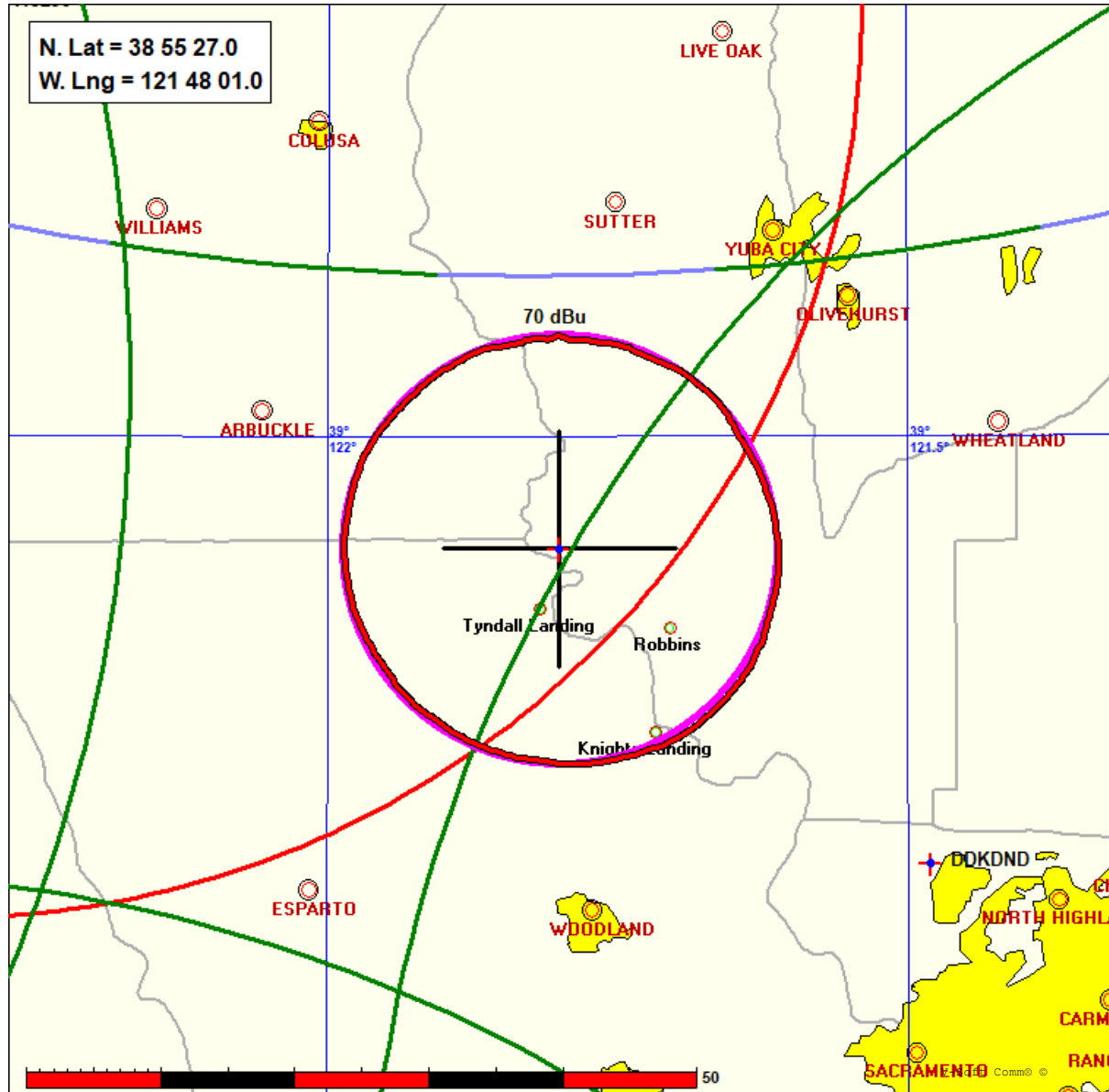
Antenna Structure Registrations (ASRs) that are within the maximum short space for channel 300A locations, could place the necessary 70 dB μ contour over 50% of an urbanized area, and could place 70 dB μ contour over the community of Robbins were examined. No ASRs were found that met all 3 criteria. These included the following ASRs: 1012084, 1221289, 1288439, and 1222352.

It was concluded that the proposed facility to be operated at Robbins, California on channel 300A, will be in full compliance with Commission rules and regulations.

CH 300 A 107.9 MHz

Current Spacings to 3rd Adj.

Exhibit 30: Fig 1 Allotment Channel Spacing
KZSZ Robbins, California 300A



		Data	Date:08-08-19	Job	Date:08-08-19			
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
DDKDND	% 300B	VAC	Sacramento	CA	130.6	36.44	177.5	-141.1
KZSZ	298B	LIC	Colusa	CA	311.5	61.33	68.5	-7.2
KCYF-FM.A	300A	APP	Sutter Creek	CA	119.9	115.32	114.5	0.8
KKLC	300C1	LIC-N	Fall River Mills	CA	359.4	220.10	199.5	20.6
AU6260306	300A	VAC	Boonville	CA	275.0	147.08	114.5	32.6
1113290	300A	APP	Boonville	CA	275.0	147.08	114.5	32.6
KSAN	299B	LIC	San Mateo	CA	202.2	147.93	112.5	35.4
KLVS	297B	LIC-N	Livermore	CA	190.5	125.12	68.5	56.6
KSRN	299C3	LIC	Kings Beach	CA	74.7	171.34	88.5	82.8
NEW.C	298A	CP	Sutter Creek	CA	116.6	121.35	30.5	90.9
KCYF-FM.C	298A	CP	Sutter Creek	CA	116.6	121.35	30.5	90.9
1795309	298A	APP	Sutter Creek	CA	127.7	122.13	30.5	91.6

All separation margins include rounding

% =Station Fails minimum 73.215 spacings

Exhibit 30: Fig 2 Site Channel Spacing
KZSZ Robbins, California 300A

REFERENCE		DISPLAY DATES
38 55 27.0 N.	CLASS = A	DATA 08-08-19
121 48 01.0 W.	Current Spacings to 3rd Adj.	SEARCH 08-08-19
----- Channel 300 - 107.9 MHz -----		

Call	Channel	Location		Azi	Dist	FCC	Margin	
DDKDND %	VAC	300B	Sacramento	CA	130.6	36.44	177.5	-141.1
KZSZ	LIC	298B	Colusa	CA	311.5	61.33	68.5	-7.2
KCYF-FM	APP	300A	Sutter Creek	CA	119.9	115.32	114.5	0.8
KKLC	LIC-N	300C1	Fall River Mills	CA	359.4	220.10	199.5	20.6
AU6260306	VAC	300A	Boonville	CA	275.0	147.08	114.5	32.6
1113290	APP	300A	Boonville	CA	275.0	147.08	114.5	32.6
KSAN	LIC	299B	San Mateo	CA	202.2	147.93	112.5	35.4
KLVS	LIC-N	297B	Livermore	CA	190.5	125.12	68.5	56.6
KSRN	LIC	299C3	Kings Beach	CA	74.7	171.34	88.5	82.8
NEW	CP	298A	Sutter Creek	CA	116.6	121.35	30.5	90.9
KCYF-FM	CP	298A	Sutter Creek	CA	116.6	121.35	30.5	90.9
1795309	APP	298A	Sutter Creek	CA	127.7	122.13	30.5	91.6

% = Station Fails minimum 73.215 spacings
All separation margins include rounding

Exhibit 30: Fig 3 Community Coverage
KZSZ Robbins, California 300A

Coverage Study - NGDC 30 SEC
08-08-2019

KZSZ CH300 A , 4.0 kW, 44.7m HAAT, 58.0m COR AMSL
Service Contour = 70 dBu.

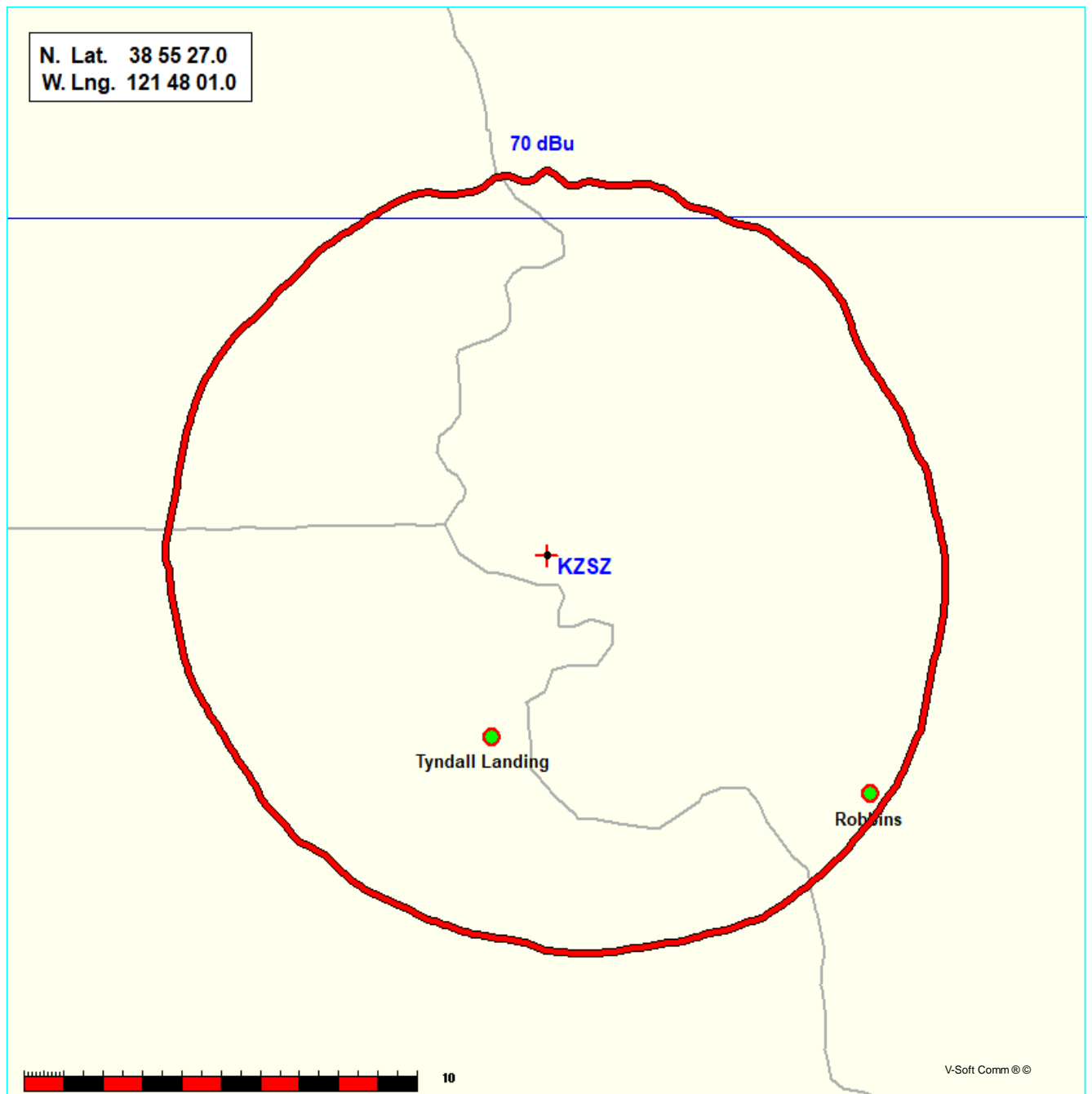


EXHIBIT 35
ENVIRONMENTAL COMPLIANCE
KZSZ ROBBINS, CALIFORNIA 300A
BUSTOS MEDIA HOLDINGS, LLC
FCC FORM 301
AUGUST 2019

The facility proposes to utilize a 2 bay full-spaced antenna, circularly polarized, EPA type 2, with an Effective Radiated Power of 4.0 kW. The proposed Center of Radiation will be 50 meters Above Ground Level. Calculations were made using FM Model for Windows, online version updated June 8, 2018, predicts a peak exposure of $16.054 \mu\text{W}/\text{cm}^2$ at a distance of 23.2 meters from the base of the tower. This represents less than 12% of the allowable Maximum Permissible Exposure (“MPE”) of $200 \mu\text{W}/\text{cm}^2$ for uncontrolled environments at any point on the ground. The applicant will ensure that the public access to the tower is restricted by fencing, anti-climb devices or other appropriate measures. The site will be posted with RF warning signs. If climbing of the tower by authorized personnel becomes necessary, transmitter power will be reduced to safe operating levels or transmission will be terminated, if necessary, as not to exceed the RF exposure limits to tower workers. The licensee will cooperate with other users at the site with the scheduling of such tower or antenna maintenance.

The site is an existing tower site. The National Programmatic Agreement generally allows such a collocation without consultation or review under Section 106 and Subpart B of 36 CFR §800. The applicant believes that it is in full compliance with the Agreement, and that no further study is required.

EXHIBIT 36
COMMUNITY OF LICENSE CHANGE STATEMENT
TECHNICAL STATEMENT
KZSZ ROBBINS, CALIFORNIA 300A
BUSTOS MEDIA HOLDINGS, LLC
FCC FORM 301
AUGUST 2019

The applicant, Bustos Media Holdings, LLC, seeks to minor change the license for KZSZ, facility I.D. 51638, from Colusa, California on channel 298B to Robbins, California on channel 300A.

The minor change of the city of license is pursuant to the current FCC rules. Bustos Media Holdings, LLC believes this application for a city change is pursuant to the current FCC rules while providing the most efficient usage of spectrum.

The proposed new community, Robbins, California, does not have an AM, FM or TV station authorized to it, and, therefore, it will be the community's first local service. Colusa will continue to enjoy first local service from KKCY and will continue enjoying a service level of 5 FM's, and 19 AM's. Robbins will have a service level of 18 FM's and 27 AM's, including its first local service.

Aural service for the coverage area of the licensed KZSZ at Colusa on channel 298B will not create any white or gray area. 3rd through 5th service areas will change by less than 0.5%. The 2010 census population of Colusa was 5,971, which is less than 7,500.

1st through 5th aural service for the coverage area of the application for KZSZ at Robbins on channel 300A will not change, except Robbins will have its first local service.

The public interest supports a change of allotments from Colusa, which will remain at its current service level, to Robbins, which will benefit from its first local service.

See Figures 1 and 2 for Service level details.

Service Level	Colusa	Robbins
1 st	0	0
2 nd	0	0
3 rd	0	0
4 th	4	0
5 th	66	0
6 th	497	0
7 th or greater	155,216	0
Total	155,783	1,923

Under the Instructions for the FCC form 301, under item 18, it calls for the following information to be included:

1) If new technical facilities are proposed, the area and population with the proposed 70 dBμ and 60 dBμ contours of the station: In this case, the population within the current contours of the allotment at Colusa is: 70 dBμ: 30,019 persons and an area of 3,534.3 sq. km, 60 dBμ: 155,783 persons and an area of 8,369.9 sq. km. The new proposed contours for the allotment at Robbins will be: 70 dBμ: 568 persons and an area of 338.0 sq. km, 60 dBμ: 5,357 persons and an area of 1,073.1 sq. km.

2) The number of stations licensed to the proposed new community of license: There is no commercial AM, FM or TV station licensed to Robbins, California. This will be the community's first local service.

3) The number of stations providing protected service to the proposed community of license: There are 16 commercial and 1 noncommercial FM stations that cover the new community with 60 dBμ service or greater. There are 27 AM stations that cover the new community with 0.5 mV/m coverage or greater.

4) The population, according to the latest Census Data, of the proposed community of license: In this case, the CDP of Robbins, California, has a population of 323 according to the 2010 U.S. Census data.

5) Where relevant to establish the precondition of a licensable community, a description of the civic, cultural, religious, social and commercial attributes of the proposed community of license: Robbins, California, has its own U.S. Post Office at 4879 Del Monte Ave with the zip code of 95676. Robbins has its own volunteer fire dept.

The following local businesses are in Robbins:

B E Giovannetti & Sons

Bob's Flying Service

Ensign

Mentren Corp

Premium Rice Group LLC

Quadren Cryogenics

Robbins Mercantile

Sunrise Dusters

Tolle's Flying Service Inc

U-Haul Neighborhood Dealer

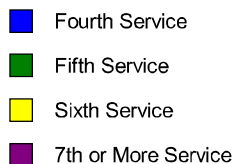
Valley Truck & Trailer Co.

Wagner Aviation Airport

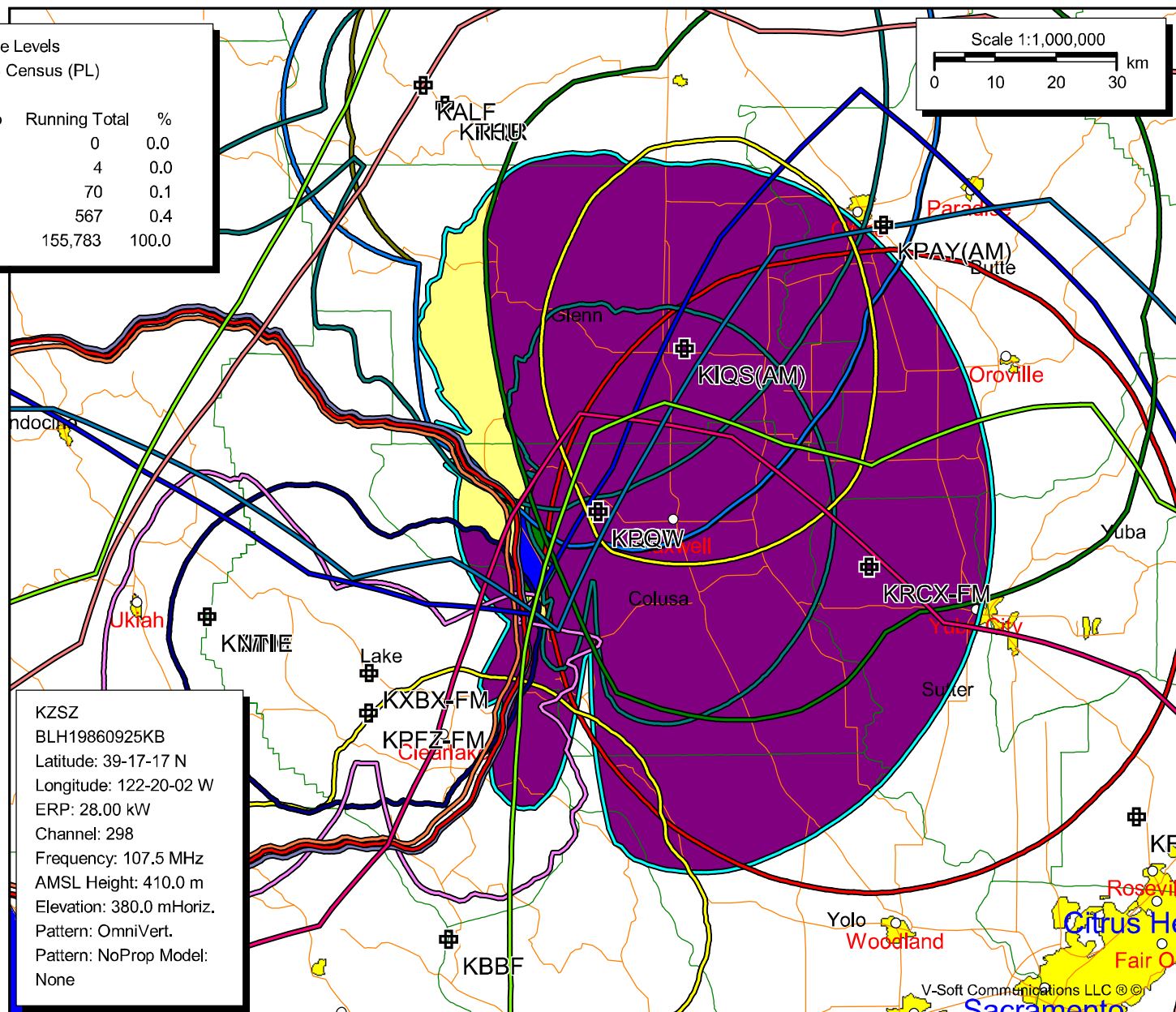
Robbins has its own elementary school, Robbins Elementary School.

6) Any other information deemed relevant: For Robbins, the 2016 estimated Median Household Income was \$51,397 and the estimated median house or condo value was \$254,200.

	Service Pop	Running Total	%
1st - 3rd Service	0	0	0.0
4th Service	4	4	0.0
5th Service	66	70	0.1
6th Service	497	567	0.4
7th Service (or >)	155,216	155,783	100.0



KZSZ
BLH19860925KB
Latitude: 39-17-17 N
Longitude: 122-20-02 W
ERP: 28.00 kW
Channel: 298
Frequency: 107.5 MHz
AMSL Height: 410.0 m
Elevation: 380.0 mHoriz.
Pattern: OmniVert.
Pattern: NoProp Model:
None






















KZSZ Proposed 300A Service Levels
Population Database: 2010 US Census (PL)

	Service Pop	Running Total	%
1st - 6th Service	0	0	0.0
7th Service (or >)	1,923	1,923	100.0

Scale 1:1,500,000



-  Fourth Service
 Fifth Service
 Sixth Service
 7th or More Service

- | | |
|---|----------|
|  | KZSZ |
|  | KRCX-FM |
|  | KGO(AM) |
|  | KCBC(AM) |
|  | KNBR(AM) |
|  | KATD(AM) |
|  | KFIA(AM) |
|  | KSTE(AM) |
|  | KXJZ |
|  | KBEb |
|  | KYMX |
|  | KSEG |
|  | KSFM |
|  | KLMG |
|  | KSAC-FM |

KZSZ
BLH19860925KB
Latitude: 38-54-34 N
Longitude: 121-39-45 W
ERP: 0.70 kW
Channel: 298
Frequency: 107.5 MHz
AMSL Height: 53.0 m
Elevation: 6.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

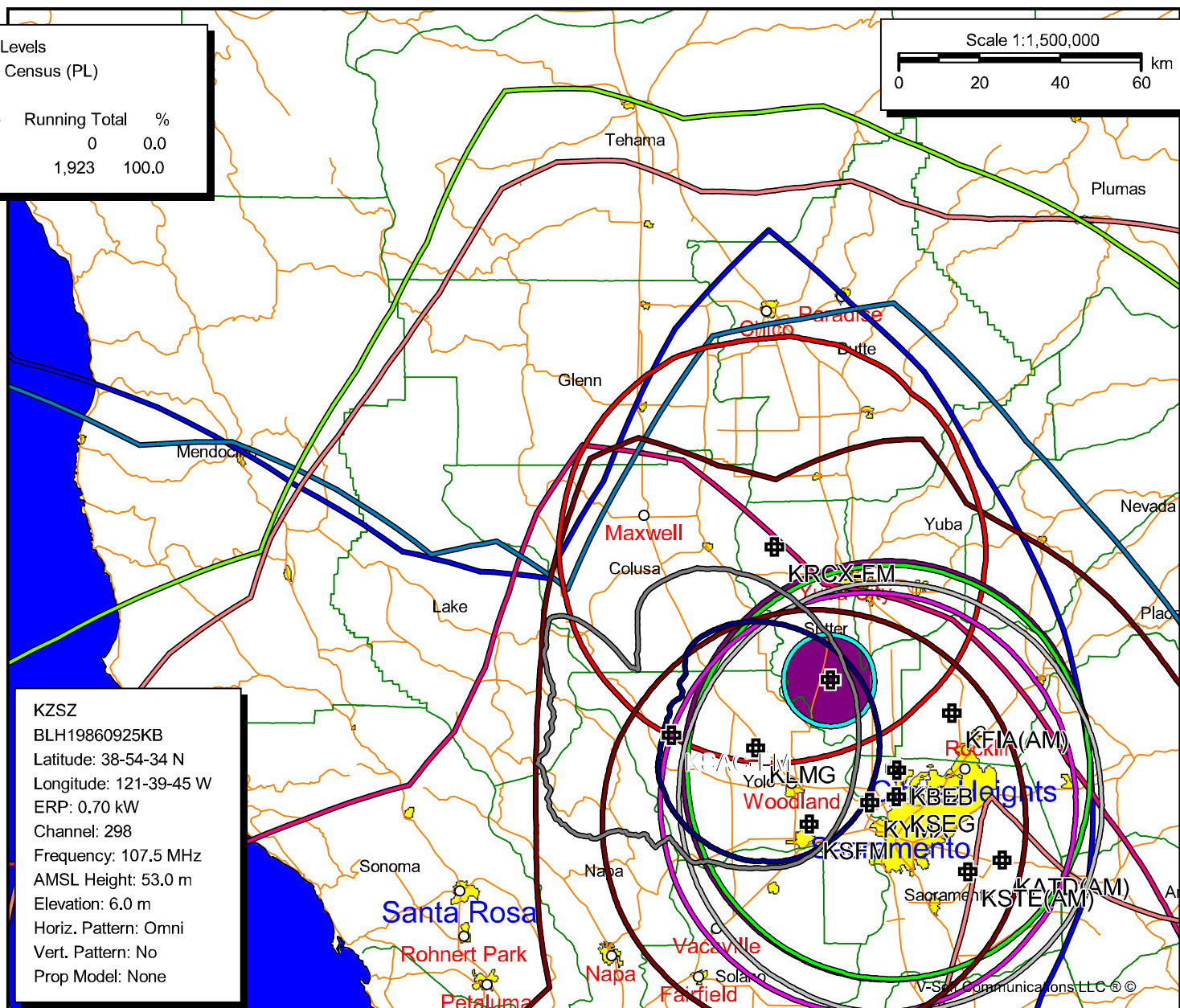


EXHIBIT B:

**PRIMARY BROADCAST STATIONS
LICENSED TO SACRAMENTO, CA**

Call Letters	Facility ID #	Frequency	FM Channel	Licensee
KHTK	20352	1140 kHz	n/a	Bonneville International Corporation
KCVV	29297	1240 kHz	n/a	Radio Santisimo Sacramento, Inc.
KTKZ	59599	1380 kHz	n/a	New Inspiration Broadcasting Company, Inc.
KJAY	65226	1430 kHz	n/a	KJAY, LLC
KIID	65482	1470 kHz	n/a	Punjabi American Media, LLC
KFBK	10145	1530 kHz	n/a	AMFM Broadcasting Licenses, LLC
KEBR	20745	88.1 MHz	201B	Family Stations, Inc.
KXPR	8358	88.9 MHz	205B	California State University, Sacramento
KXJZ	8336	90.9 MHz	215B	California State University, Sacramento
KYDS	58888	91.5 MHz	218A	San Juan Unified School District
KBEB	10146	92.5 MHz	223B	AMFM Broadcasting Licenses, LLC
KYMX	72116	96.1 MHz	241B	Bonneville International Corporation
KSEG	11281	96.9 MHz	245B	Entercom License, LLC
KRXQ	20354	98.5 MHz	253B	Entercom License, LLC
KZZO	65481	100.5 MHz	263B	Bonneville International Corporation
KHHM	20435	103.5 MHz	278A	Entravision Holdings, LLC
KNCI	20353	105.1 MHz	286B	Bonneville International Corporation
KUDL	57889	106.5 MHz	293B	Entercom License, LLC

EXHIBIT C
BUSINESSES IN ROBBINS, CALIFORNIA

The following local businesses are in Robbins:

- B E Giovannetti & Sons
- Bob's Flying Service
- Ensign
- Mentren Corp
- Premium Rice Group LLC
- Quadren Cryogenics
- Robbins Mercantile
- Sunrise Dusters
- Tolle's Flying Service Inc
- U-Haul Neighborhood Dealer
- Valley Truck & Trailer Co.
- Wagner Aviation Airport