

## **Effect of RM-11727 Upon FM Translators and Low Power FM Stations**

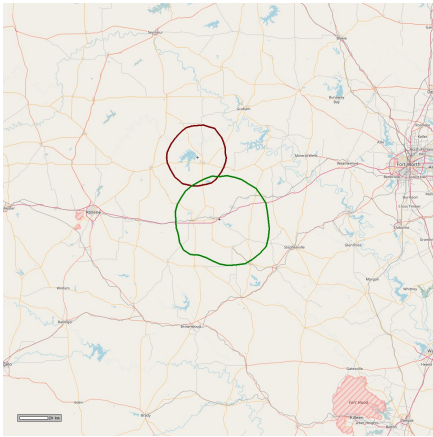
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on Monday, February 26, 2018

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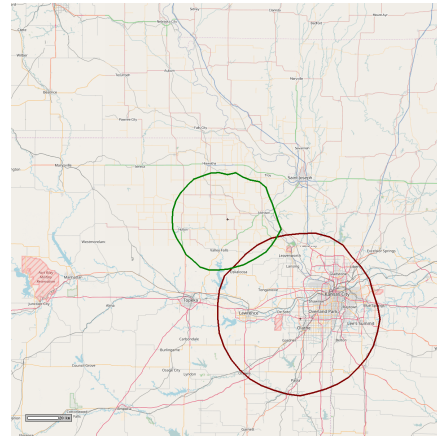
In order to demonstrate that full implementation of RM-11727 will cause no harm to existing FM translator and Low Power FM (LPFM) facilities, co-petitioner SSR Communications, Inc. (“SSR”) has prepared a comprehensive study examining each of the 217 FM Class A stations deemed “most likely” to take advantage of RM-11727's FM Class C4 allocation upgrade and found that *not one* FM translator or LPFM station would be forced off of the air as a consequence of the proposal.

Of the 217 FM Class A stations most likely to upgrade to FM Class C4, just one LPFM station would cause prohibited contour overlap interference to the primary service station, and just twenty-one translators would do the same. In each of the twenty-two combined cases, however, an engineering remedy exists to clear the overlap, resulting in *no net effect* of the full implementation of RM-11727 upon FM translator and LPFM facilities.

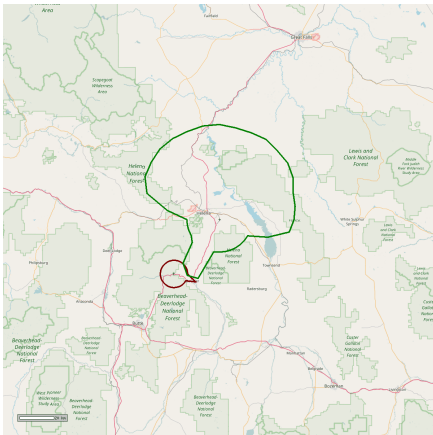
Each of the cases is depicted herein, with F(50,50) 60 dBu primary service area contours shown in green, with F(50,10) interfering contours shown in dark red. Contrary to the prevailing industry notion that RM-11727 will impact secondary services negatively, actual data supports a conclusion that full implementation of the proposal will result in negligible, if any consequence.



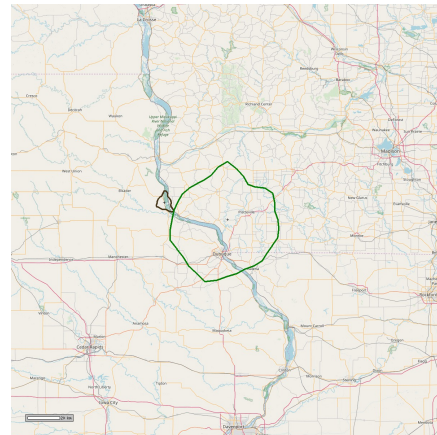
Case 1: KATX 97.7 FM, FacID 71352 vs. NEW 97.5 FM, Fac ID 202683  
Remedy: Relocate translator to 97.1/97.3 FM  
Result: **NO NET EFFECT**



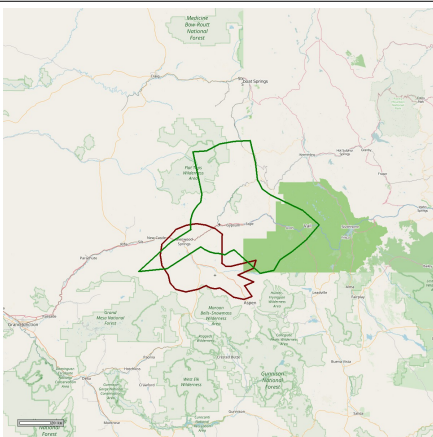
Case 2: KDVB 96.9 FM, FacID 164159 vs. K245CC 96.9 FM, Fac ID 140359  
Remedy: Null translator pattern to KDVB  
Result: **NO NET EFFECT**



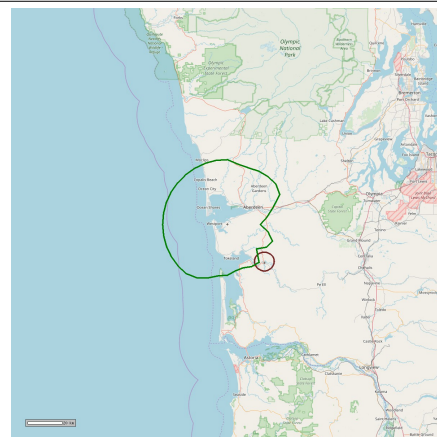
Case 3: KHGC 98.5 FM, FacID 170988 vs. KBAS-LP 98.3 FM, Fac ID 134663  
Remedy: Terrain anomaly, no actual interference  
Result: **NO NET EFFECT**



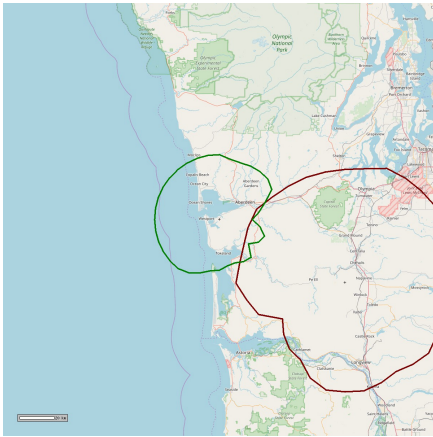
Case 4: KIYX 106.1 FM, FacID 77326 vs. K292DJ 106.3 FM, Fac ID 16781  
Remedy: All interference occurs over water  
Result: **NO NET EFFECT**



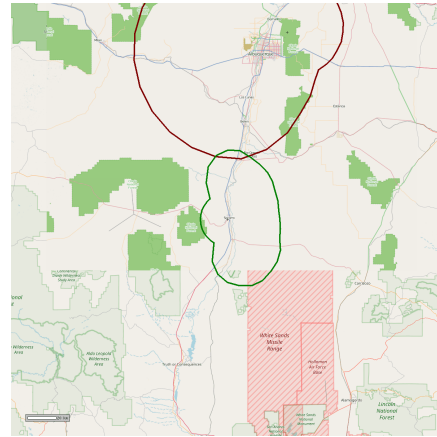
Case 5: KKVC 100.1 FM, FacID 190382 vs. K261AK 100.1 FM, Fac ID 56695  
Remedy: Relocate translator to 102.1 FM  
Result: **NO NET EFFECT**



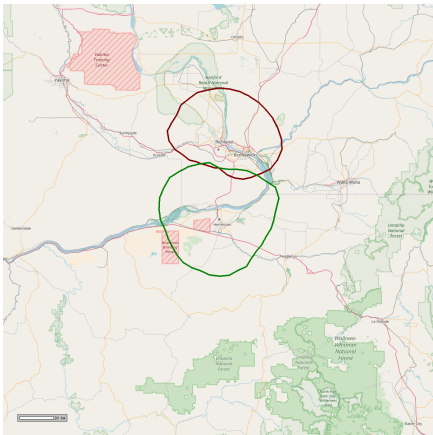
Case 6: KLWA 101.3 FM, FacID 164150 vs. K266BL 101.1 FM, Fac ID 138405  
Remedy: Relocate translator to 100.3 FM  
Result: **NO NET EFFECT**



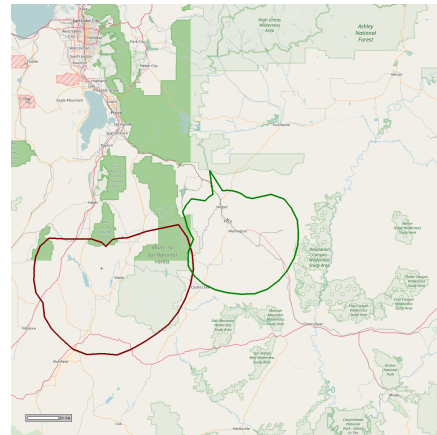
Case 7: KLWA 101.3 FM, FacID 164150 vs. NEW 101.3 FM, Fac ID 202510  
Remedy: Relocate translator to 100.1 FM  
Result: **NO NET EFFECT**



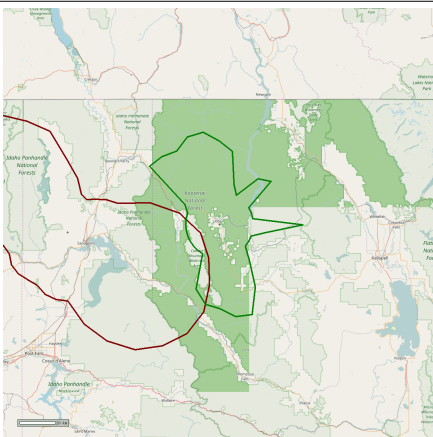
Case 8: KMXQ 92.9 FM, FacID 72615 vs. K225CH 92.9 FM, Fac ID 79321  
Remedy: Null translator pattern to KMXQ  
Result: **NO NET EFFECT**



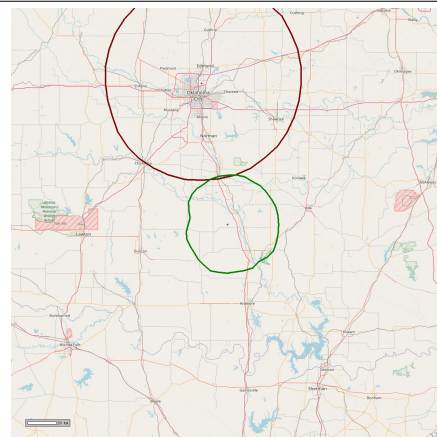
Case 9: KQFM 93.7 FM, FacID 27076 vs. K230BW 93.9 FM, Fac ID 155242  
Remedy: Null translator pattern to KQFM  
Result: **NO NET EFFECT**



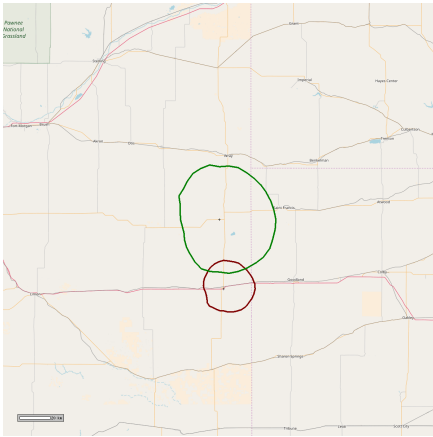
Case 10: KRPX 95.3 FM, FacID 164148 vs. K236BE 95.1 FM, Fac ID 139681  
Remedy: Relocate translator to 103.5 FM  
Result: **NO NET EFFECT**



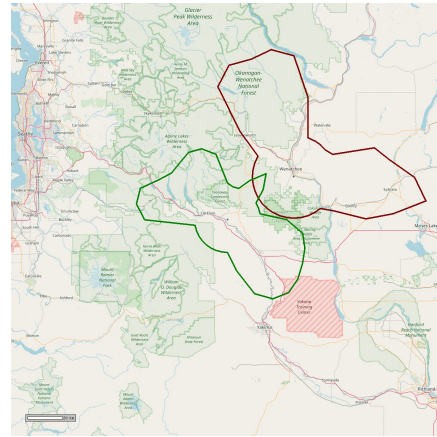
Case 11: KTNV 101.7 FM, FacID 37524 vs. K269DU 101.7 FM, Fac ID 61940  
Remedy: Relocate translator to 97.1/97.3 FM  
Result: **NO NET EFFECT**



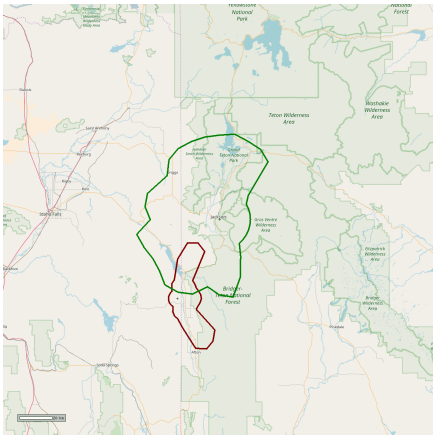
Case 12: KVOY 104.5 FM, FacID 185094 vs. K283BW 104.5 FM, Fac ID 145901  
Remedy: Relocate translator to 105.3 FM  
Result: **NO NET EFFECT**



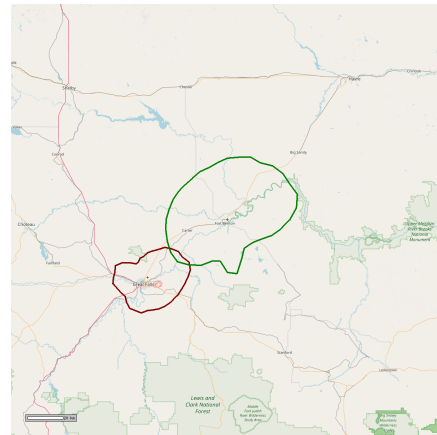
Case 13: KWDI 94.1 FM, FacID 164298 vs. K230CD 93.9 FM, Fac ID 200667  
Remedy: Relocate translator to 93.3 FM  
Result: **NO NET EFFECT**



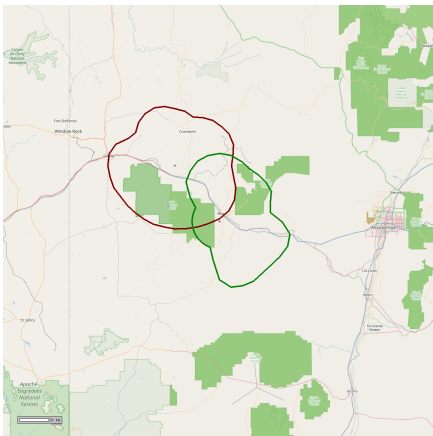
Case 14: KXAA 100.3 FM, FacID 87569 vs. K262DB 100.3 FM, Fac ID 200807  
Remedy: Relocate translator to 105.5 FM  
Result: **NO NET EFFECT**



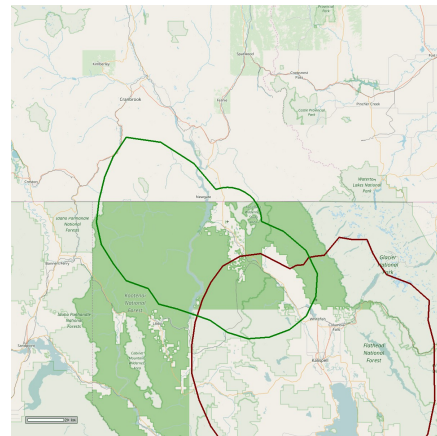
Case 15: KXJN 97.7 FM, FacID 166043 vs. K249CW 97.7 FM, Fac ID 38918  
Remedy: Relocate translator to 97.9 FM  
Result: **NO NET EFFECT**



Case 16: KYPZ 96.1 FM, FacID 164087 vs. NEW 95.9 FM, Fac ID 202967  
Remedy: Relocate translator to 95.3 FM  
Result: **NO NET EFFECT**

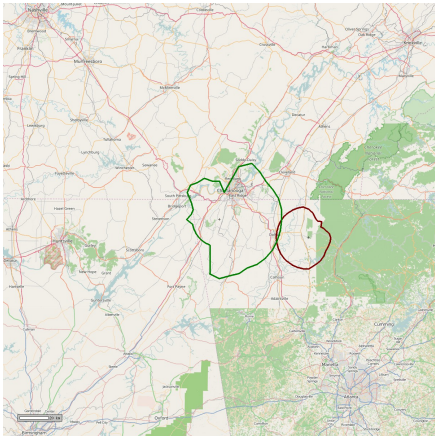


Case 17: KZNM 101.9 FM, FacID 183360 vs. K270AP 101.9 FM, Fac ID 144774  
Remedy: Relocate translator to 102.7 FM  
Result: **NO NET EFFECT**

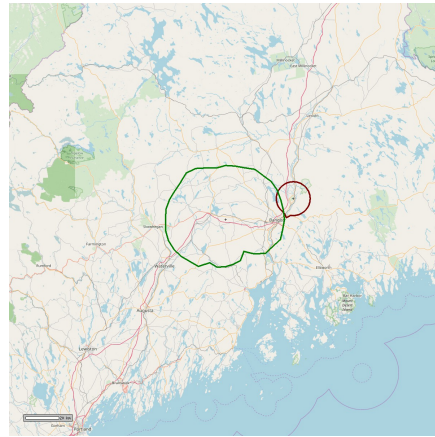


Case 18: KZXT 93.5 FM, FacID 164302 vs. K228FM 93.5 FM, Fac ID 148354  
Remedy: Relocate translator to 93.1 FM  
Result: **NO NET EFFECT**

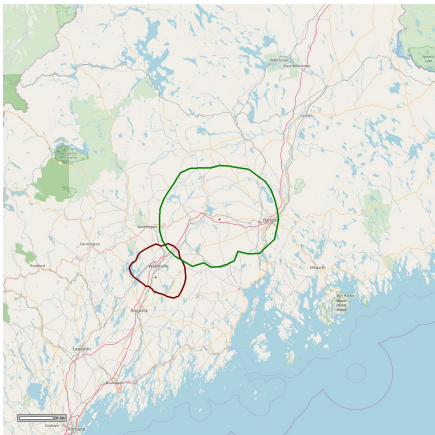




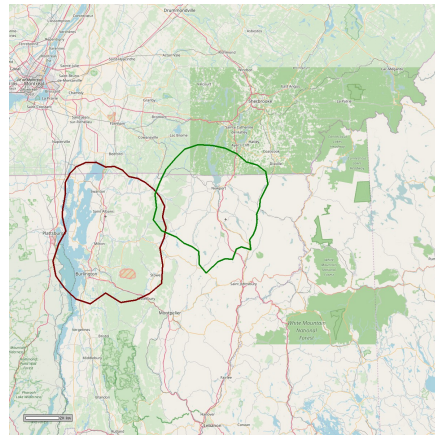
Case 19: WBDX 102.7 FM, FacID 54445 vs. W273BS 102.5 FM, Fac ID 28338  
Remedy: Relocate translator to 105.3 FM  
Result: **NO NET EFFECT**



Case 20: WJCX 99.5 FM, FacID 421 vs. NEW 99.3 FM, Fac ID 147867  
Remedy: Relocate translator to 96.5 FM  
Result: **NO NET EFFECT**



Case 21: WJCX 99.5 FM, FacID 421 vs. W259BY 99.7 FM, Fac ID 142052  
Remedy: Relocate translator to 94.7 FM  
Result: **NO NET EFFECT**



Case 22: WQJQ 100.3 FM, FacID 164279 vs. NEW 100.3 FM, Fac ID 201105