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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 )  
(Wellton, Arizona) )

MM Docket No. )  
RM- )

To: The Commission

PETITION FOR RULE MAKING

Farmworkers Communications, Inc. ("Farmworkers"), by its attorneys, hereby petitions the Commission to amend the FM Table of Allotments by assigning FM Channel 283C2 at Wellton, Arizona, as that community's first local aural service. In support thereof, the following is shown:

Farmworkers is the licensee of noncommercial educational FM station KUFW, Woodlake, California. As demonstrated in the attached Engineering Exhibit, from the special reference point (geographic coordinates 32° 40' 22" NL, 114° 08' 46" WL) selected by Farmworkers for a Wellton transmitter site, Channel 283C2 can be assigned as proposed, in full compliance with all applicable separations and coverage requirements. Mexican concurrence is, however, required because the specified location is within 320 kilometers of the U.S./Mexican border.

The allocation proposed herein will serve the public interest by affording a first local service to the 1,066 persons residing in Wellton, as well as providing a new service to the 103,712 persons residing within the 1.0 mV/m contour, assuming construction of maximum facilities. Wellton is a well-established community, long identified by the U.S. Census as an

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Incorporated Place. Should the Commission allot Channel 283C2 to Wellton, Arizona, Farmworkers will file an application for a permit to construct a new FM station on that channel and will, if its application is granted, promptly construct and operate the station.

Accordingly, it is respectfully requested that the Commission amend the FM Table of Allotments as follows:

<u>Community</u>	<u>Channel</u>	
	<u>Present</u>	<u>Proposed</u>
Wellton, Arizona	--	283C2

Respectfully submitted,  
FARMWORKERS COMMUNICATIONS, INC.

By: Anne Thomas Paxson  
Anne Thomas Paxson

Its Attorney

Borsari & Paxson  
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Suite 630  
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(202) 296-4800

January 7, 1993

JOHN J. MULLANEY  
JOHN H. MULLANEY, P.E.

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

301 921-0115

**ENGINEERING EXHIBIT RM:**

**FARMWORKERS COMMUNICATIONS, INC.  
WELLTON, ARIZONA  
ALLOTMENT OF FM CHANNEL 283C2**

**NOVEMBER 23, 1992**

**ENGINEERING STATEMENT IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ASSIGNMENTS**

**ORIGINAL  
SIGNATURE**

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT RM:**  
**FARMWORKERS COMMUNICATIONS, INC.**  
**WELLTON, ARIZONA**  
**ALLOTMENT OF FM CHANNEL 283C2**

**TABLE OF CONTENTS:**

1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, Channel Allocation Study for Ch. 283C2  
from City Reference Coordinates.

**MULLANEY ENGINEERING, INC.**

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Farmworkers Communications, Inc., to prepare an engineering statement in support of a Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
John J. Mullaney

Executed on the 23rd day of November 1992.

ENGINEERING EXHIBIT RM:

FARMWORKERS COMMUNICATIONS, INC.  
WELLTON, ARIZONA  
ALLOTMENT OF FM CHANNEL 283C2

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of Farmworkers Communications, Inc. The purpose of this statement is to support a request that the FM Table of Assignments be amended to allot Ch. 283C2 to Wellton, Arizona.

Channel 283C2 will be the First Local Service to be licensed to Wellton located in Yuma County Arizona.

It should be noted that the area in question is within 320 kilometers (199 miles) of a U.S. Border and, therefore, Mexican concurrence is required.

II. ENGINEERING DISCUSSION:

A. Proposed Site:

The following geographic coordinates are listed for the community of Wellton, Arizona:

Latitude: 32° 40' 22"

Longitude: 114° 08' 46"

The proposed site will provide an unobstructed view of the City of License, Wellton, Arizona and is located close enough to serve the entire Community with the required 3.16 mV/M contour.

**B. Channel Allocation Study:**

Figure 1 is a Channel Allocation Study from the Special Reference Point proposed herein which indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings. From this study it can be determined that the proposed special reference point exceeds all of the minimum separations.

**C. Public Interest Showing:**

The allotment of Ch. 283C2 to Wellton will result in a first local service to Wellton which has a 1990 population of 1,066 persons.

Assuming maximum facilities, the 1.0 mV/m contour has the potential of encompassing 103,712 persons of which 100,499 persons are located in Yuma County. The population of Yuma County Arizona is 106,895 (1990 Census) and, therefore, the proposed C2 facility will serve 94 percent of the county.

Farmworkers believes that the requested channel allotment is in the Public Interest and should therefore be granted by the Commission.

Farmworkers Communications, Inc.  
Allotment of Ch. 283C2

MULLANEY ENGINEERING, INC.

III. SUMMARY:

Farmworkers Communications, Inc., requests that the FM Table of Assignments be amended to allot FM Channel 283C2 to Wellton, Arizona.

City	Present	Proposed
Wellton, Arizona	-	283C2

Farmworkers believes that the proposed allotment of a first local service to Wellton, Arizona, will Serve the Public Interest.

If allotted, Farmworkers will promptly file an application for construction permit.

November 23, 1992.

  
\_\_\_\_\_  
John J. Mullaney

NEW 283 C2 FM POLARIZATION ERP (KW) HAAT RCAHSL  
 WELLTON AZ US HOR PLW BM TILT (METER) (METER)  
 32.4022 114.0846 (D.MSS) HORIZONTAL 50.000 0.000 150.0  
 VERTICAL 50.000 0.000 150.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:  
 ERP= 50.000 (KW) 17.0 (DBK) HAAT= 150.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING DOMESTIC  
 DBU KM  
 CO CHANNEL ( 40.0) 137.7  
 1ST ADJACENT ( 54.0) 78.1  
 2ND ADJACENT ( 80.0) 19.9  
 3RD ADJACENT (100.0) 6.0  
 PROTECTED ( 60.0) 52.2  
 CITY GRADE ( 70.0) 32.6

AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
			70 DBU	60 DBU
0.0	118.1	387.3	29.3	47.7
45.0	189.4	621.5	36.5	56.4
90.0	173.8	570.1	35.1	55.0
135.0	143.6	471.1	31.9	51.3
180.0	116.5	382.1	29.1	47.5
225.0	136.3	447.2	31.1	50.3
270.0	207.1	679.4	37.9	58.0
315.0	115.3	378.2	29.0	47.3
AVERAGE	150.0	492.1	32.6	52.2

EST SITE ELEVATION : 91.4 m.; 300.0 ft.  
 EST RAD CENTER AGL : 191.9 m.; 629.7 ft.  
 RAD CENTER A.M.S.L.: 283.4 m.; 929.7 ft.

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 38.4 KM ON A BEARING OF 199.0 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH		LAT		LONG		ERP (KW)		HAAT		D I-CON		P-CON		IR		IC		REZLT				
FRDM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MSS)	REL	CHN	HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR	IC		
													(KM)	(KM)	(KM)	(KM)	(KM)					
270.0	89.3	XHBA	OPE		Mexicali	BN M	32.4000	115.2701	2ND 281C	100.H	V	600				122.3	105.					
267.2	85.7	XHERS	OPE		Tijuana	BN M	32.3125	117.0035	CO 283B	57.H	V	188				269.3	240.					
**COMMENT**NEGOTIATED-LESS SEPARATION THAN ESTABLISH. MAY OPERATE MAX. FAC.																						
358.8	178.8		VAC		Lake Hava	AZ A	34.3254	114.1137	CO 283C2	H	V	0				208.1	190.					
**COMMENT**Effective 10-15-91-Reserved for KZULFM per D90-468													**DOCKET**90-468									
68.7	249.9	KVRY	LIC	BLH6100	Mesa	AZ A	33.2004	112.0335	1ST 284C	100.H	100.V	472				208.3	188.					
302.6	121.3	KDESFM	APP	BPH8811281B	Palm Spri	CA A	33.5156	116.2604	1ST 284B	2.0H	2.0V	159				250.9	169.					
**COMMENT**Erp below minimum for class																						
302.6	121.3	KDESFM	LIC	BLH7536	Palm Spri	CA A	33.5156	116.2604	1ST 284B	42.H	42.V	165				250.9	169.					
**COMMENT**NEGOTIATED-LESS SEPARATION THAN ESTBLISHED.MAY OPERATE MAX FAC.																						
236.2	55.8		VAC		Estacion	BN M	32.1130	114.5930	3RD 286A	H	V					95.8	65.					

\*\*\* NORMAL TERMINATION FM CHANNEL STUDY NO. 1 \*\*\* 51 FM RECORDS WERE CONSIDERED, OF WHICH 7 WERE PRINTED ABOVE \*\*\*

**CHANNEL ALLOCATION STUDY**

FARMWORKERS COMMUNICATIONS, INCORPORATED  
 ALLOCATION OF FM CHANNEL 283C2 TO  
 WELLTON, ARIZONA

**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 1**

**NOVEMBER 1992**