

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Florence and Comobabi, Arizona) )

MM Docket No. 00-107  
RM - 9891

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JUL 31 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch  
Policy & Rules Division  
Mass Media Bureau

COMMENTS

Desert West Air Ranchers Corporation ("Desert West"), by its counsel, hereby submits its comments in support of the Notice of Proposed Rule Making ("NPRM"), DA 00-1260, released June 9, 2000 in the above captioned proceeding. In support hereof, Desert West states as follows:

1. The NPRM proposed to substitute Channel 276C for Channel 276C1 at Florence, Arizona and modify the license for Station KCDX(FM) accordingly. In addition, the NPRM proposed to delete vacant Channel \*275A at Comobabi, Arizona or substitute Channel \*289A for Channel \*275A at Comobabi if an interest were expressed in applying for the channel. Alternatively, the NPRM stated that if a frequency in the reserved portion of the FM band can be demonstrated to be available at Comobabi, then Channel \*275A could be deleted without the allotment of a substitute channel.

2. As indicated in the attached Exhibit E, there are at least three noncommercial educational channels (202A, 206A, 209A) available for application to serve Comobabi. The study was performed at center city coordinates at Comobabi. It would be possible to improve the power

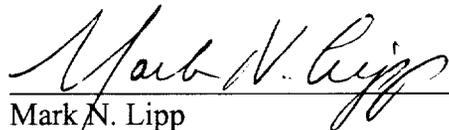
over that specified in the Exhibit through judicious site selection and avoid overlap. Thus, the Commission should delete Channel \*275A from Comobabi and direct any potential applicants to the reserved portion of the band.

3. Desert West has a pending application (BPH-20000728 \_\_) to relocate its current Class C1 facility to another site which is short spaced to Channel \*275A at Comobabi. In its application the applicant requested a change in the reference coordinates for Channel \*275A at Comobabi in order to avoid the proposed short spacing. Although Desert West's application could be granted with a change in the Comobabi reference coordinates, Desert West does want Channel \*275A deleted from Comobabi in order to upgrade to Class C and avoid having to directionalize its facility toward Comobabi.

4. Desert West hereby restates its interest in applying for Channel 276C at Florence and in constructing the facility.

Respectfully submitted,

DESERT WEST AIR RANCHERS CORPORATION



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July 31, 2000

**EXHIBIT E**  
**NON COMMERCIAL**  
**CHANNELS FOR**  
**COMOBABI, ARIZONA**  
**JULY 2000**

This exhibit shall demonstrate that there are numerous opportunities for non commercial FM stations for Comobabi, Arizona in the reserved portion of the FM band should the Commission be inclined to delete the current non commercial channel 275A at Comobabi. This exhibit by no means represents an exhaustive or all inclusive accounting for all the numerous opportunities for non commercial FM stations for Comobabi. It does show, however, that there are at least three channels which could be applied for in the small community.

Comobabi is listed in the Rand McNalley Commercial Atlas with a population of 180 persons. The community is less than 1 kilometer across at any point. Minimum Class A FM facilities (100 watts) could therefore easily provide 60 dbu coverage to the entire community. None of these options are optimized for best coverage or maximum power. The use of a well chosen site and the use of directional antennas may provide for increased power and opportunities for additional channels. All three of the following possible engineering solutions are based upon the Commission's reference point for Comobabi of: 32-03-29 N 111-47-58 W as follows:

**1. CHANNEL 202A COMOBABI, ARIZONA**

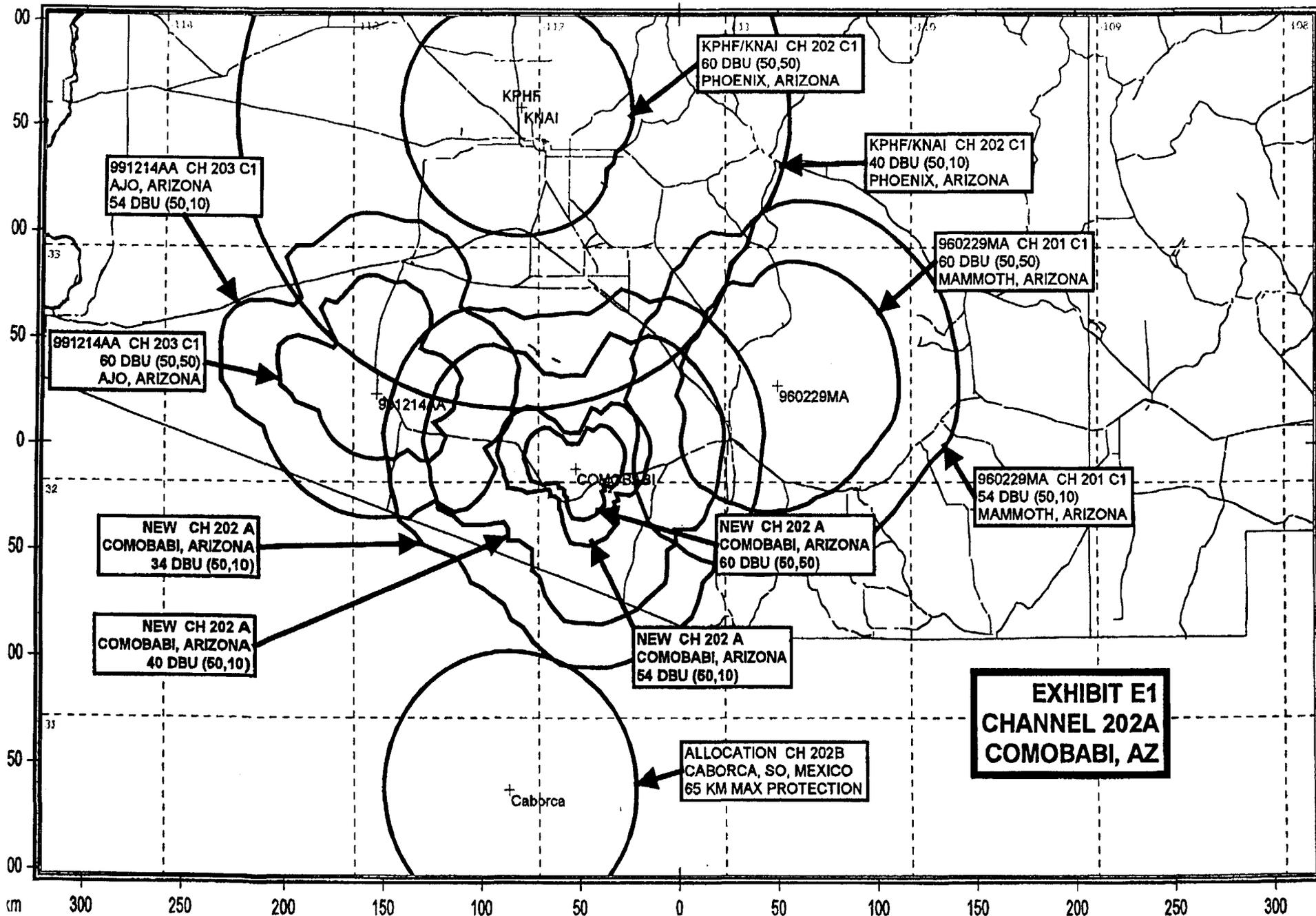
Channel 202 as a class A facility with 1.9 kW at 100 m HAAT and a non directional antenna could be applied for at Comobabi. The facility protects co-channel KPHF/KNAI Channel 202C1, Phoenix, Arizona and first adjacent channel applications 991214AA Channel 203C1 Ajo, Arizona and 960229MA Channel 201C1 Mammoth, Arizona. Pursuant to the US/Mexican Treaty, contour protection is also afforded Channel 202B Caborca, Sonora, Mexico. **EXHIBIT E1** demonstrates the lack of prohibited overlap and the viability of this option. While television Channel 6, Tucson, Arizona is 110 km away, the 1990 population within the 60 dBu of this option is 775 persons which is less than the threshold amount of 3000 persons requiring consideration by the rules.

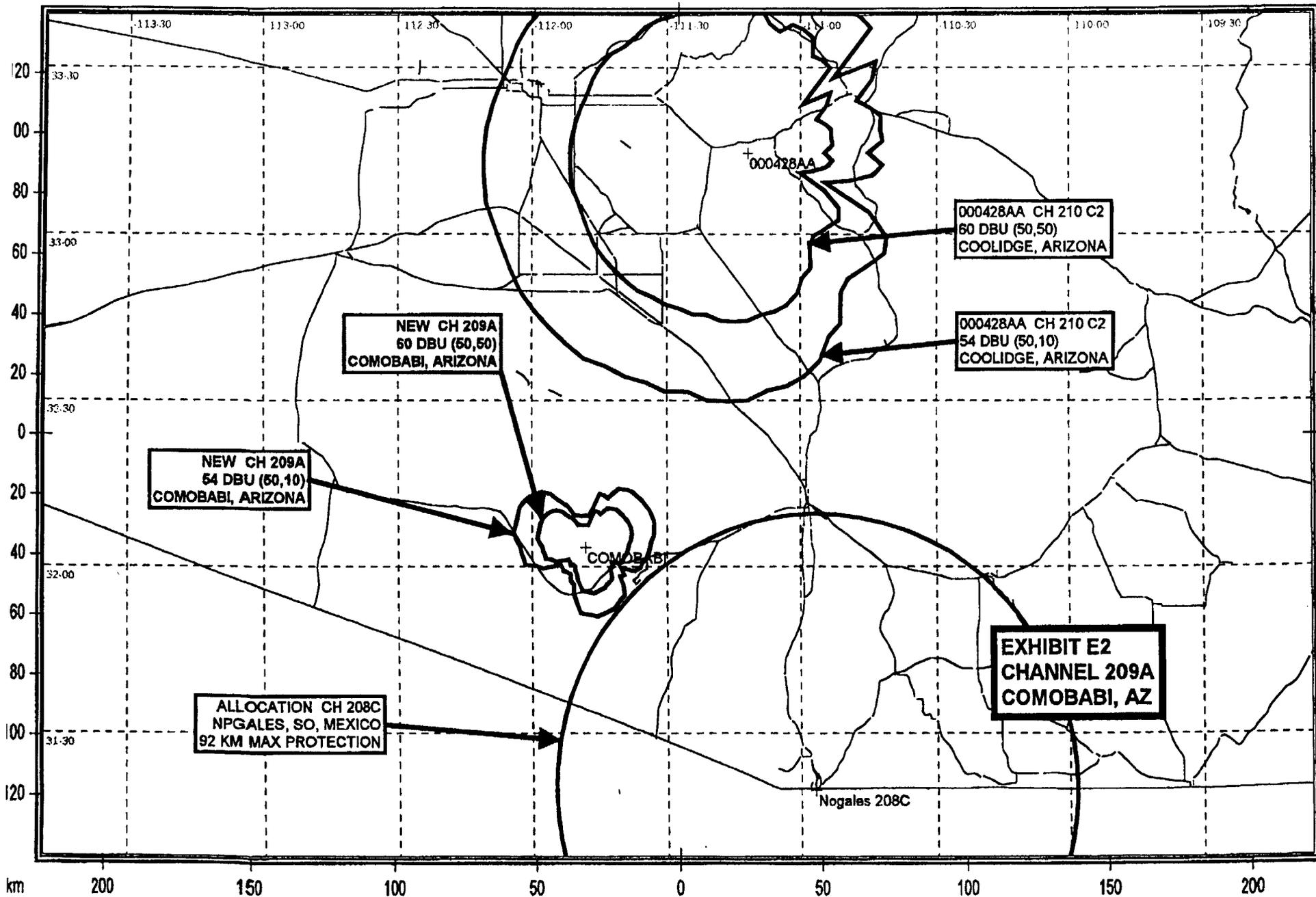
**2. CHANNEL 209A COMOBABI, ARIZONA**

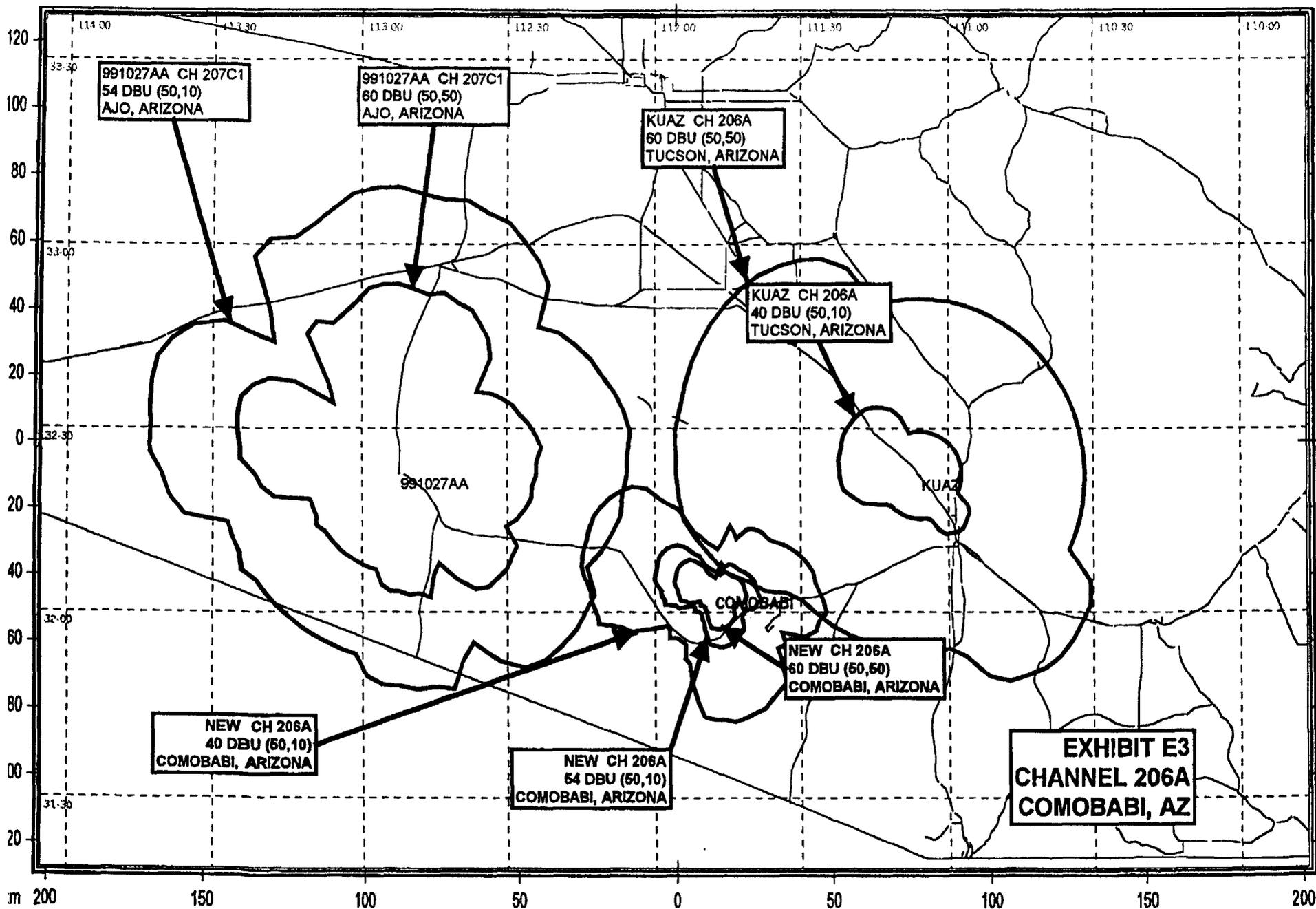
Channel 209 as a class A facility with 0.3 kW at 100 m HAAT and a non directional antenna could be applied for at Comobabi. The facility protects first adjacent channel application 000428AA Channel 210C2 Coolidge, Arizona. Pursuant to the US/Mexican Treaty, contour protection is also afforded Channel 208C Nogales, Sonora, Mexico. **EXHIBIT E2** demonstrates the lack of prohibited overlap and the viability of this option. While Television Channel 6, Tucson, Arizona is 110 km away, the population within the 60 dBu of this option is 469 persons which is less than the threshold amount of 3000 persons requiring consideration by the rules.

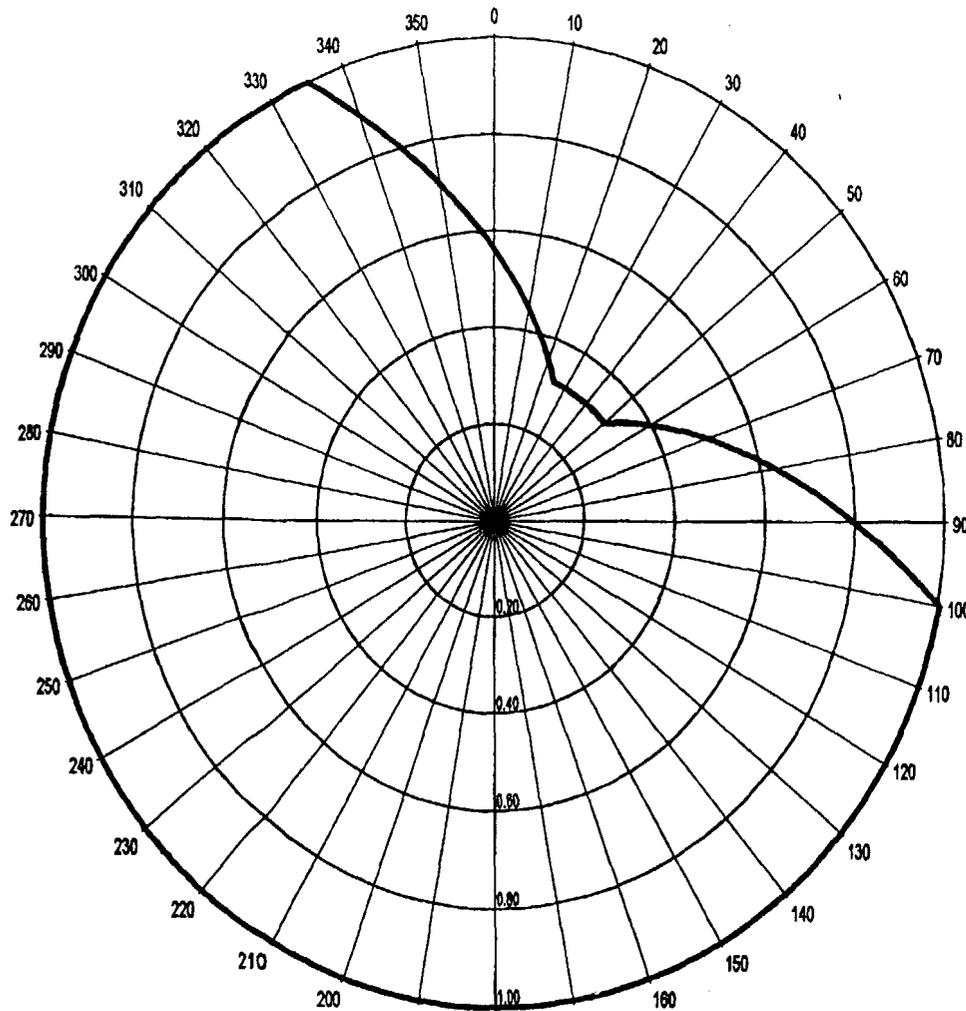
**3. CHANNEL 206A COMOBABI, ARIZONA**

Channel 206 as a class A facility with 0.1 kW at 100 m HAAT and a directional antenna (see **EXHIBIT E3a**) could be applied for at Comobabi. The facility protects co-channel KUAZ 209A, Tucson, Arizona and first adjacent channel application 991027AA Channel 207C1 Ajo, Arizona. **EXHIBIT E3** demonstrates the lack of prohibited overlap and the viability of this option. While Television Channel 6, Tucson, Arizona is 110 km away, the population within the 60 dBu of this option is 368 persons which is less than the threshold amount of 3000 persons requiring consideration by the rules.









**EXHIBIT E3a**  
**DIRECTIONAL ANTENNA**  
**CHANNEL 206A**  
**COMOBABI, ARIZONA**

| Azim  | Rel.FS | ERP [W] | dBk     |
|-------|--------|---------|---------|
| 0.0   | 0.562  | 31.584  | -15.005 |
| 5.0   | 0.501  | 25.100  | -16.003 |
| 10.0  | 0.446  | 19.842  | -17.013 |
| 15.0  | 0.398  | 15.840  | -18.002 |
| 20.0  | 0.354  | 12.532  | -19.020 |
| 25.0  | 0.316  | 9.986   | -20.006 |
| 30.0  | 0.316  | 9.986   | -20.006 |
| 35.0  | 0.316  | 9.986   | -20.006 |
| 40.0  | 0.316  | 9.986   | -20.006 |
| 45.0  | 0.316  | 9.986   | -20.006 |
| 50.0  | 0.316  | 9.986   | -20.006 |
| 55.0  | 0.354  | 12.532  | -19.020 |
| 60.0  | 0.398  | 15.840  | -18.002 |
| 65.0  | 0.446  | 19.842  | -17.013 |
| 70.0  | 0.501  | 25.100  | -16.003 |
| 75.0  | 0.562  | 31.584  | -15.005 |
| 80.0  | 0.630  | 39.670  | -14.013 |
| 85.0  | 0.707  | 49.965  | -13.012 |
| 90.0  | 0.794  | 63.044  | -12.004 |
| 95.0  | 0.891  | 79.308  | -11.002 |
| 100.0 | 1.000  | 100.000 | -10.000 |
| 105.0 | 1.000  | 100.000 | -10.000 |
| 110.0 | 1.000  | 100.000 | -10.000 |
| 115.0 | 1.000  | 100.000 | -10.000 |
| 120.0 | 1.000  | 100.000 | -10.000 |
| 125.0 | 1.000  | 100.000 | -10.000 |
| 130.0 | 1.000  | 100.000 | -10.000 |
| 135.0 | 1.000  | 100.000 | -10.000 |
| 140.0 | 1.000  | 100.000 | -10.000 |
| 145.0 | 1.000  | 100.000 | -10.000 |
| 150.0 | 1.000  | 100.000 | -10.000 |
| 155.0 | 1.000  | 100.000 | -10.000 |
| 160.0 | 1.000  | 100.000 | -10.000 |
| 165.0 | 1.000  | 100.000 | -10.000 |
| 170.0 | 1.000  | 100.000 | -10.000 |
| 175.0 | 1.000  | 100.000 | -10.000 |
| 180.0 | 1.000  | 100.000 | -10.000 |

| Azim  | Rel.FS | ERP [W] | dBk     |
|-------|--------|---------|---------|
| 185.0 | 1.000  | 100.000 | -10.000 |
| 190.0 | 1.000  | 100.000 | -10.000 |
| 195.0 | 1.000  | 100.000 | -10.000 |
| 200.0 | 1.000  | 100.000 | -10.000 |
| 205.0 | 1.000  | 100.000 | -10.000 |
| 210.0 | 1.000  | 100.000 | -10.000 |
| 215.0 | 1.000  | 100.000 | -10.000 |
| 220.0 | 1.000  | 100.000 | -10.000 |
| 225.0 | 1.000  | 100.000 | -10.000 |
| 230.0 | 1.000  | 100.000 | -10.000 |
| 235.0 | 1.000  | 100.000 | -10.000 |
| 240.0 | 1.000  | 100.000 | -10.000 |
| 245.0 | 1.000  | 100.000 | -10.000 |
| 250.0 | 1.000  | 100.000 | -10.000 |
| 255.0 | 1.000  | 100.000 | -10.000 |
| 260.0 | 1.000  | 100.000 | -10.000 |
| 265.0 | 1.000  | 100.000 | -10.000 |
| 270.0 | 1.000  | 100.000 | -10.000 |
| 275.0 | 1.000  | 100.000 | -10.000 |
| 280.0 | 1.000  | 100.000 | -10.000 |
| 285.0 | 1.000  | 100.000 | -10.000 |
| 290.0 | 1.000  | 100.000 | -10.000 |
| 295.0 | 1.000  | 100.000 | -10.000 |
| 300.0 | 1.000  | 100.000 | -10.000 |
| 305.0 | 1.000  | 100.000 | -10.000 |
| 310.0 | 1.000  | 100.000 | -10.000 |
| 315.0 | 1.000  | 100.000 | -10.000 |
| 320.0 | 1.000  | 100.000 | -10.000 |
| 325.0 | 1.000  | 100.000 | -10.000 |
| 330.0 | 1.000  | 100.000 | -10.000 |
| 335.0 | 1.000  | 100.000 | -10.000 |
| 340.0 | 0.891  | 79.308  | -11.002 |
| 345.0 | 0.794  | 63.044  | -12.004 |
| 350.0 | 0.707  | 49.965  | -13.012 |
| 355.0 | 0.630  | 39.670  | -14.013 |