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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In Re	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket _____
Table of Allotments,	)	RM-_____
FM Broadcast Stations	)	
Houston and Anchorage, Alaska	)	

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Federal Communications Commission
Office of Secretary

To: Chief, Policy and Rules Division

ERRATUM PETITION FOR RULEMAKING

The Petition for Rulemaking to substitute Channel 234C1 for Channel 234C2 at Houston, Alaska, and to substitute Channel 286C1 for Channel 287C1 at Anchorage, Alaska, that I filed on behalf of Chester P. Coleman, licensee of Station KADX, Houston, Alaska, on November 13, 2000, is hereby corrected to substitute the Engineering Statement attached hereto for the Engineering Statement submitted with the original filing. This substitution is being made because it has been called to the undersigned's attention that the original Engineering Statement was missing one or more pages.

Respectfully submitted,

David Tillotson
4606 Charleston Terrace, NW
Washington, DC 20007
Tel: 202-625-6241

Attorney for Chester P. Coleman

Date: December 1, 2000

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AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS FOR THE FEDERAL COMMUNICATIONS COMMISSION

TO SUBSTITUTE CHANNEL 234C1 FOR CHANNEL 234C2 FOR USE AT HOUSTON, ALASKA

AND TO SUBSTITUTE CHANNEL 286C1 FOR CHANNEL 287C1 FOR USE AT ANCHORAGE, ALASKA

CHESTER P. COLEMAN

8/2000

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Chester P. Coleman ("Coleman"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. Coleman proposes:

1) The substitution of Channel 234C1 for Channel 234C2 at Houston, Alaska, and the modification of the license of FM station KADX to specify operation on Channel 234C1, and;

2) The substitution of Channel 286C1 for Channel 287C1 at Anchorage, Alaska, and the modification of the license of FM station KNIK to specify operation on Channel 286C1.

It should be noted that the proposed channel substitutions, in addition to allowing KADX to upgrade to Class C1 facilities, will also eliminate the IF spacing requirement between KADX and KNIK. Thus, grant of the instant proposal will allow KNIK greater flexibility in future transmitter site selection.

Houston Channel 234C1 Allocation Study

Coleman is the licensee of station KADX, which operates on Channel 234C2 at Houston, Alaska. As outlined in the attached channel study, Channel 234C1 can be assigned for use at Houston at the present transmitter site of KADX (NL 61° 29' 23" x WL 149° 45' 52") in

compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 286C1 is substituted for Channel 287C1 at Anchorage.

Anchorage Channel 286C1 Allocation Study

As outlined in the attached channel study, Channel 286C1 can be substituted for Channel 287C1 at the present transmitter site of KNIK (NL 61° 11' 33" x WL 149° 54' 01"). Ubik Corporation is the licensee of KNIK.

It is noted that three applications have been filed for new LPFM stations on Channel 284 at Anchorage. Two of those applications were filed by the same entity, IMBP of Alaska, but at slightly different site coordinates. The third application was filed by the Organization for Northern Development d/b/a Out North. At the time of filing, these LPFM applications were on a third-adjacent channel to KNIK, and thus were not required to meet any spacing requirements with respect to KNIK. The proposed modification of KNIK to Channel 286C1, however, will move these translators onto a second-adjacent channel with respect to KNIK.

As is demonstrated by the attached contour map, all three Anchorage LPFM applications on Channel 284 propose transmitter sites which are located within the KNIK 70 dBu contour, and thus can be expected to cause second-adjacent channel interference within the KNIK 70 dBu contour once KNIK moves to Channel 286C1.

Paragraph 66 of the Report and Order in MM Docket No. 99-25 "In the Matter of Creation of Low Power Radio Service" states in part:

> FM stations have a core responsibility to service their principal communities. Therefore, we will not permit an operating LPFM station to cause interference within a commercial or NCE FM station's 3.16 mV/m (70 dB) contour. This issue can only arise in connection with a subsequently filed full-service new station or modification application. If grant of such an application would result in predicted interference within the 3.16 mV/m (70 dBu) contour of the proposed station, the affected LPFM station will be provided an opportunity to demonstrate that interference is unlikely to occur within this contour due to, for example, terrain shielding. If the LPFM station fails to make a sufficient showing, it will be directed to cease operations upon the commencement of program tests by the commercial or NCE FM station.

Specific rules corresponding to Paragraph 66 of the Report and Order are codified in §73.809. Based on a reading of these Rules, it is believed that it will be incumbent on the successful applicant (if any) for an LPFM station on Channel 284 at Anchorage to either correct any interference subsequently caused to KNIK (once that station commences program test on Channel 286C1), or cease operation altogether.

Gain and Loss Areas

There are no gain or loss areas associated with the proposed channel substitution at Anchorage, since the new (and equivalent) Class C1 channel would be allotted at the coordinates of the existing KNIK operation.

Since it is proposed to allot Channel 234C1 at the present KADX site, there would be no loss area associated with the proposed channel substitution at Houston. There would, however, be a gain area. The present Channel 234C2 allotment provides 60 dBu service to 8,558 km², encompassing 262,117 persons (1990 Census), whereas the proposed Channel 234C1

allotment would provide 60 dBu service to 16,417 km², encompassing 264,240 persons (1990 Census). This represents an increase of 7,859 km² and 2,123 persons.

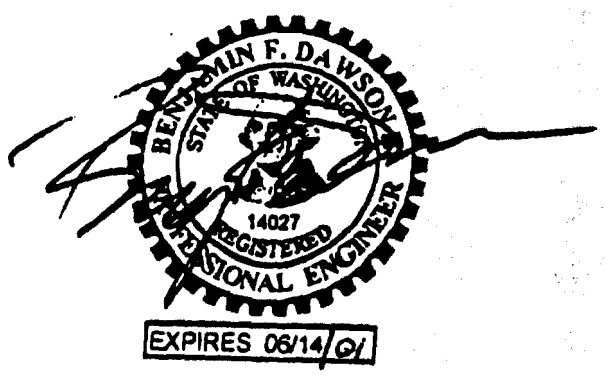
No Canadian Concurrence Required

Since neither Houston nor Anchorage is located within 320 kilometers of the US-Canadian border, concurrence of the Canadian government will not be required.

Certification

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Houston and Anchorage, Alaska has been prepared on behalf of Chester P. Coleman. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 8th day of August, 2000.



Benjamin F. Dawson III, P.E.

SEARCH PARAMETERS

Channel: 286
Class: C1
Latitude: 61 11 33
Longitude: 149 54 1
Safety Zone: 32 km
Job Title: KNIK 286C1

Call Status	City St FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K283AB	SOLDOTNA	283D	0.260 DA	60-31-26	221.2	98.32	0
LIC	AK BLFT-19920410	104.5	0.0	151- 4-51		0.00	TRANS
K285EF	KENAI	285D	0.250 DA	60-30-40	225.0	106.34	0
LIC	AK BLFT-19920410	104.9	0.0	151-16-12		0.00	TRANS
K285EG	SEWARD	285D	0.250 DA	60- 7-32	167.6	121.63	0
LIC	AK BLFT-19930111	104.9	0.0	149-25-50		0.00	TRANS
K285EG	SEWARD	285D	0.248 DA	60- 6-12	168.0	123.98	0
LIC	AK BLFT-19981022	104.9	0.0	149-26-12		0.00	TRANS
KNIK-FM	ANCHORAGE	287C1	51.000	61-11-33	0.0	0.00	177
LIC	AK BLH-19900507	105.3	78.0	149-54- 1		-177.00	SHORT

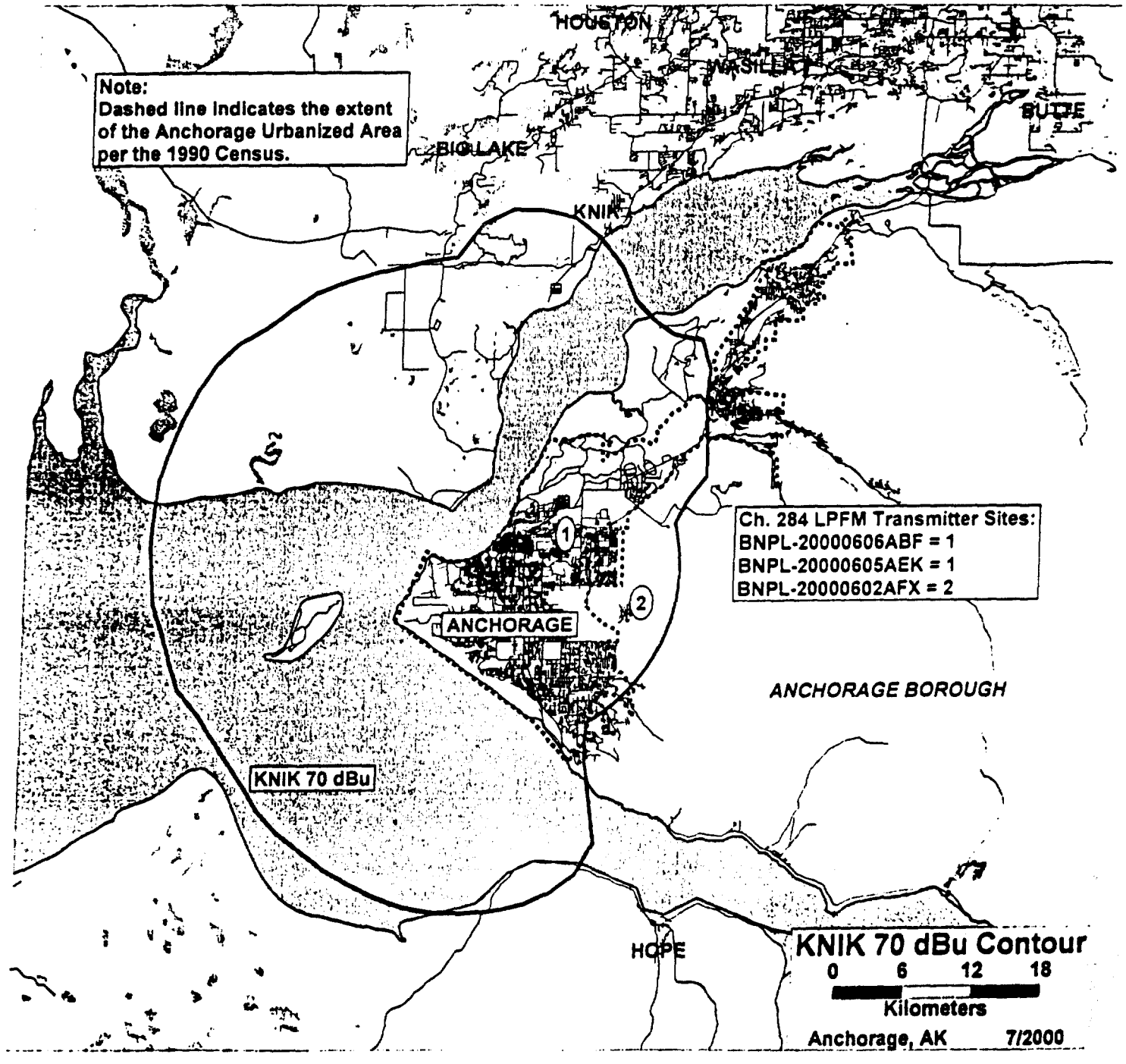
END OF FM SPACING STUDY FOR CHANNEL 286

SEARCH PARAMETERS

Channel: 234
Class: C1
Latitude: 61 29 3
Longitude: 149 45 52
Safety Zone: 32 km
Job Title: KADX 234C1

Call Status	City St FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KADX	HOUSTON	234C2	50.000	61-29- 3	0.0	0.00	224
LIC	AK BLH-19990525	94.7	113.0	149-45-52		-224.00	SHORT
KNIK-FM	ANCHORAGE	287C1	51.000	61-11-33	192.7	33.31	34
LIC	AK BLH-19900507	105.3	78.0	149-54- 1		-0.69	SHORT

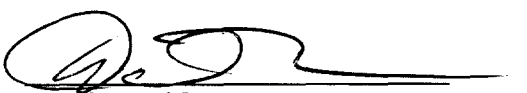
END OF FM SPACING STUDY FOR CHANNEL 234


Note:
Dashed line indicates the extent of the Anchorage Urbanized Area per the 1990 Census.
HOUSTON
WASILLA
BUTTE
BIG LAKE
KNIK
Ch. 284 LPFM Transmitter Sites:
BNPL-20000606ABF = 1
BNPL-20000605AEK = 1
BNPL-20000602AFX = 2
1
2
ANCHORAGE
ANCHORAGE BOROUGH
KNIK 70 dBu
HOPE
KNIK 70 dBu Contour
0 6 12 18
Kilometers
Anchorage, AK 7/2000

CERTIFICATE OF SERVICE

I, David Tillotson, do hereby certify that a copy of the foregoing Erratum to Petition for Rulemaking has been sent via first class United States mail, postage pre-paid, this 1st day of December 2000, to:

Ubik Corporation
3700 Woodland Drive
Suite 700
Anchorage, AK 99517



David Tillotson