

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

In the Matter of)
)
Amendment of Section 73.202(b)) MB Docket No. 11-167
Table of Allotments) RM-11645
FM Broadcast Stations)
(Altamont and Bonanza, Oregon))

FILED/ACCEPTED

TO: The Secretary
ATTN: Chief, Policy Division
Media Bureau

FEB 22 2012
Federal Communications Commission
Office of the Secretary

REPLY COMMENTS OF THRESHOLD COMMUNICATIONS

Threshold Communications (“Threshold”), by counsel, hereby submits its Reply Comments in response to the application of Educational Media Foundation (“EMF”) to modify the facilities of KYSF, Bonanza, Oregon so as to move from Channel 275C3 to Channel 236C3.¹ That application is mutually exclusive with the proposal proffered by Threshold in its Petition for Rulemaking and as set forth in the FCC’s *Notice of Proposed Rulemaking* (the “NPRM”) in this proceeding to substitute Channel 235C1 for Channel 249C1 at Altamont, Oregon.² The application has been designated as a counterproposal in this proceeding.³

¹ See File No. BPH-20110819ABZ. At the time the application was filed, Basin Mediactive, LLC was the licensee of KYSF. Basin subsequently assigned the station to EMF pursuant to the Commission’s grant of the assignment application in File No. BALH-20111020ABI. EMF therefore became Basin’s successor-in-interest to the subject application.

² 26 FCC Rcd. 14336 (MB 2011).

³ See, *Petitions for Rulemaking Filed*, Public Notice, Report No. 2946, released February 7, 2012.

As explained in Threshold's Petition for Rulemaking and in its Comments, Threshold is an applicant for a new FM station at Butte Falls, Oregon, having been the winning bidder for this allotment in Auction No. 91. The Butte Falls allotment is on Channel 290A with a site restriction that would place the antenna site at a remote and undeveloped location on land in proximity to the Rouge River National Forest. The site is unfeasible. Failure to find an alternative site will likely result in the complete impossibility of constructing the new station. In an effort to create an alternative opportunity, Threshold has proposed to substitute Channel 249A for Channel 290A at Butte Falls. There is a great deal more flexibility in site selection for Channel 249A, which will dramatically increase the feasibility of building and operating the new station. The fly in the ointment is that Channel 249A at Butte Falls is mutually exclusive with the existing allotment on Channel 249C1 at Altamont. Addressing that problem, Threshold proposed to substitute Channel 235C1 for Channel 249C1 at Altamont.⁴

If the KYSF application were granted, Channel 249C1 would have to remain at Altamont, blocking the use of Channel 249A at Butte Falls and the effort to construct Butte Falls' first local transmission service would be fatally derailed. However, an analysis of the comparative benefits to be gained from the competing proposals in this proceeding demonstrates that Threshold's proposal would result in the preferred distribution of allotments. As the accompanying Technical Statement shows, the modification proposed for KYSF will result in a gain of only 415 persons covered with 60 dbu or greater service. All of the area encompassing the gained population is already very adequately served by at least seven existing FM stations. The benefit to be derived from this very modest increase in population served by KYSF is decisively outweighed by the

⁴ Threshold does not intend to file an application for the Altamont allotment.

ultimate goal of Threshold's proposal – to maintain the only local aural transmission service for Butte Falls. Establishing a first local transmission service is a higher priority than providing a new service to a relatively small population that is already enjoying an abundance of service.⁵

Furthermore, as is also demonstrated in the Technical Statement, an alternate channel is available for EMF to use for the proposed modifications to KYSF. If the Commission adopts the proposal to delete Channel 249C1 at Altamont, Channel 248C3 would become available to substitute for Channel 275C3 at Bonanza. This solution would achieve a satisfactory result for both Threshold and EMF in this proceeding. The use of an additional alternate channel to resolve a conflict between mutually exclusive proposals/applications is consistent with Commission policy and practice in such cases. *See, Pinewood, South Carolina*, Memorandum Opinion and Order, 5 FCC Rcd. 7609 (1990).

In summary, Threshold's proposed arrangement of allotments would be the preferred allocation plan with greater public interest benefits. In any event, there is an alternate channel available to accommodate the modification of KYSF as well without disturbing Threshold's proposal. Threshold urges the Commission to adopt the proposal set forth in its NPRM in this proceeding.

⁵ *See, Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

Respectfully submitted,

THRESHOLD COMMUNICATIONS

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February 22, 2012

TECHNICAL COMMENTS
THRESHOLD COMMUNICATIONS
MB DOCKET #11-167
KYSF RADIO STATION
BONANZA, OREGON
February 2012

TECHNICAL STATEMENT

This Technical Statement and associated exhibits were prepared on behalf of Threshold Communications (“TC”), applicant for a new FM station at Butte Falls, Oregon and Petitioner in MB Docket #11-167, which seeks the substitution of Channel 235C1 for Channel 249C1 at Altamont, Oregon. Educational Media Foundation (“EMF”)¹ has a pending application proposing the substitution of Channel 236C3 for Channel 275C3 at Bonanza, Oregon to enable the use of a non-directional antenna system for its station KYSF.² This application has subsequently become a counterproposal in MB Docket #11-167. The proposed use of Channel 236C3 at Bonanza, Oregon is mutually exclusive with proposed use of Channel 235C1 at Altamont, Oregon.

A review has been conducted to determine the amount of service gain that KYSF would achieve were it to delete its directional antenna system, expanding coverage in a westerly direction. The licensed KYSF facility provides a 60 dBu contour to 61,363 persons (2010 Census) in 4,104 square kilometers. A non-directional KYSF facility would provide a 60 dBu contour to 61,778 persons (2010 Census) in 4,788 square kilometers. Therefore, there is a gain

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- 1) EMF’s predecessor in interest was Basin Mediactive, LLC, the entity that originally submitted the KYSF application to change channels; KYSF was then sold to EMF.
 - 2) The application proposes to make this channel change at the licensed KYSF site.

of 415 persons in 684 square kilometers for KYSF operating non-directionally. There is no corresponding loss of service.

Exhibit #1 is a map which depicts the present and proposed 60 dBu contours of the KYSF facility showing the gain area of the proposed application. In addition, the 60 dBu contours of all full time FM stations which provide coverage to the KYSF gain area are depicted. As indicated, seven FM station contours encompass the entire gain area (KLAD-FM, KFLS-FM, KSKF, KKRB, KFEG, KKKJ and KAGO)³. Further, six additional stations provide partial 60 dBu contours to the gain area. The gain area is, therefore, considered well-served. A tabulation of the stations providing coverage to the gain area is attached as Exhibit #2.

Further, a review of channels from the present/proposed KYSF site reveals that there is an alternate channel which would accommodate the EMF counterproposal request in MB Docket #11-167. TC has proposed the substitution of Channel 235C1 for Channel 249C1 at Altamont, Oregon. As that change would remove Channel 249C1 from Altamont, Oregon, this would leave Channel 248C3 available for allotment to Bonanza, Oregon at the KYSF site at North Latitude 42° 05' 48" and West Longitude 121° 37' 57". Therefore, TC requests that, in the event the Commission finds the EMF proposal valid, it specify the use of Channel 248C3 in lieu of the requested Channel 236C3 and order KYSF to Channel 248C3. This would allow the TC request at Altamont, Oregon and companion hybrid application for a proposed channel change at Butte

3) The technical facilities of KKRB and KFEG are the same and therefore have identical 60 dBu contours.

Falls, Oregon.⁴ As indicated on Exhibit #3, Channel 248C3 can be substituted for Channel 275C3 at Bonanza, Oregon.

The foregoing was prepared on behalf of Threshold Communications by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of its belief and knowledge. All FM data was extracted from the Commission's CDBS database, as updated on February 21, 2010. All census data was extracted from the U.S. Census database (2010 census). We assume no liability for errors or omissions in either database which may be adverse to these comments.

4) TC has proposed the substitution of Channel 249A for Channel 290A at Butte Falls, Oregon. The change of channels at Altamont, Oregon was necessary to accommodate this change.

Graham Brock, Inc. - Broadcast Technical Consultants

KYSF.A Proposed
 BPH-20110819ABZ
 Latitude: 42-05-48 N
 Longitude: 121-37-57 W
 ERP: 0.46 kW
 Channel: 236C3
 Frequency: 95.1 MHz
 AMSL Height: 1978.0 m
 Horiz. Pattern: Omni
 Prop Model: FCC

KYSF License
 BMLED-20111028ADP
 Latitude: 42-05-48 N
 Longitude: 121-37-57 W
 ERP: 0.46 kW
 Channel: 275C3
 Frequency: 102.9 MHz
 AMSL Height: 1978.0 m
 Horiz. Pattern: Directional
 Prop Model: FCC

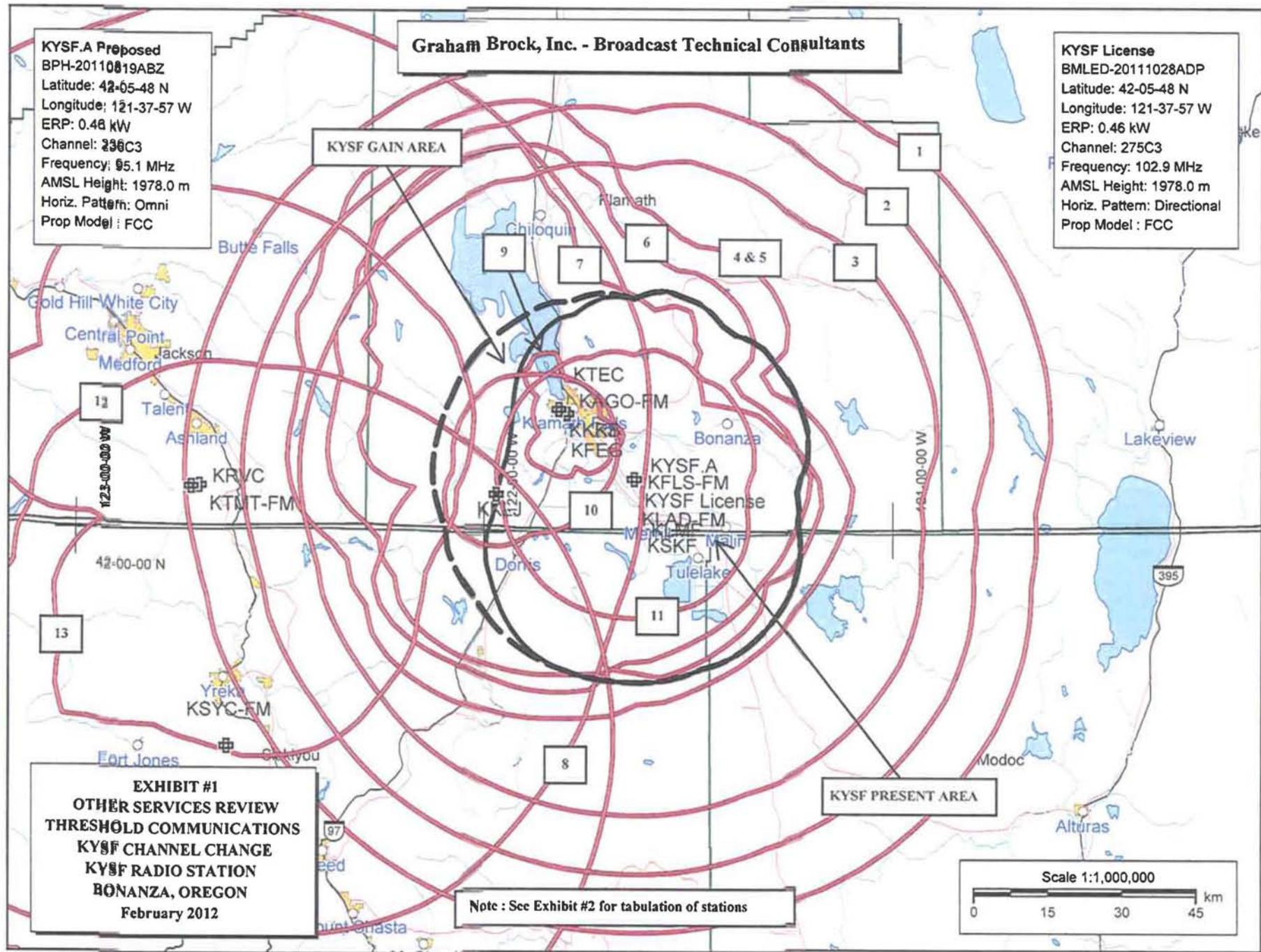
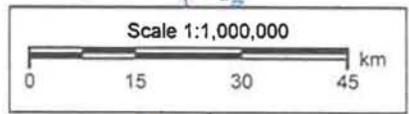


EXHIBIT #1
OTHER SERVICES REVIEW
THRESHOLD COMMUNICATIONS
KYSF CHANNEL CHANGE
KYSF RADIO STATION
BONANZA, OREGON
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Note : See Exhibit #2 for tabulation of stations



TECHNICAL COMMENTS
THRESHOLD COMMUNICATIONS
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EXHIBIT #2

Stations Providing Service to Gain Area

		Call	Channel	City, State
1)	+	KLAD-FM	223C	Klamath Falls, Oregon
2)	+	KFLS-FM	243C	Tulelake, California
3)	+	KSKF	215C1	Klamath Falls, Oregon
4)	+	KKRB	295C1	Klamath Falls, Oregon
5)	+	KFEG	284C1	Klamath Falls, Oregon
6)	+	KKKJ	288C2	Merrill, Oregon
7)	+	KAGO-FM	258C1	Klamath Falls, Oregon
8)	*	KTMT-FM	229C	Medford, Oregon
9)	*	KTEC	208A	Klamath Falls, Oregon
10)	*	KKLJ	205A	Klamath Falls, Oregon
11)	*	KLMF	203A	Klamath Falls, Oregon
12)	*	KSYC-FM	280C1	Yreka, California
13)	*	KRVC	255C2	Hornbrook, California

+ 60 dBu contour covers entire gain area.

* Provides 60 dBu contour to a portion of the gain area.

TECHNICAL COMMENTS
THRESHOLD COMMUNICATIONS
MB DOCKET #11-167
KYSF RADIO STATION
BONANZA, OREGON
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EXHIBIT #3

Clearance Study for KYSF Bonanza, California
Using KYSF Existing/Proposed Site as Reference

REFERENCE	CLASS = C3	DISPLAY DATES
42 05 48.0 N.	Current Spacings to 3rd Adj.	DATA 02-21-12
121 37 57.0 W.		SEARCH 02-21-12
----- Channel 248 - 97.5 MHz -----		

Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
KYSF	APP 248C3	Bonanza	OR	0.0	0.0	153.0	-153.0
	42 05 48.0	121 37 57.0	CX	0.460 kW		642 M	
	Educational Media Foundation						
	> Alternate channel proposal - Theshold Communications						
* R14367	DEL 249C1	Altamont	OR	269.4	29.8	144.0	-114.2
	42 05 36.0	121 59 35.0		100.000 kW		299 M	
	Threshold Communications						
	> to Channel 235C1 - Threshold Communications						
* DKRAT	VAC 249C1	Altamont	OR	269.4	29.8	144.0	-114.2
	42 05 36.0	121 59 35.0	N	100.000 kW		299 M	
	> to Channel 235C1 - Threshold Communications						
1435248	RSV-A 249A	Butte Falls	OR	300.6	90.7	89.0	1.7
	42 30 24.0	122 35 01.0		6.000 kW		100 M	
	Threshold Communications						
1433970	APP 249A	Butte Falls	OR	300.6	90.7	89.0	1.7
	42 30 24.0	122 35 01.0	CX	0.300 kW		438 M	
	Threshold Communications						
	BNPH-20110630AHK						
KNLR	LIC 248C1	Bend	OR	6.3	221.4	211.0	10.4
	44 04 38.0	121 19 49.0	EN	97.000 kW		163 M	
	Cowan Broadcasting Llc						
	BLH-19850114LW						
KNCQ	LIC 247C	Redding	CA	207.4	186.5	176.0	10.5
	40 36 10.0	122 38 58.0	CN	28.000 kW		1088 M	
	Results Radio Of Redding						
	BLH-19851104KF						
KROG	LIC 245C	Grants Pass	OR	283.8	139.2	96.0	43.2
	42 22 56.0	123 16 29.0	CN	25.000 kW		679 M	
	Opus Broadcasting Systems						
	BLH-19860403KB						
KTOD-LP	LIC 251L1	Lakeview	OR	84.1	106.5	40.0	66.5
	42 11 17.0	120 21 01.0		0.100 kW	0 M		
	Hope For Today Broadcasting						
	BLL-20050617AAP						

* Note: Threshold Communications has requested that Channel 235C1 be substituted for Channel 249C1 at Altamont, Oregon. With this proposed change, Channel 248C3 can be used for the KYSF channel change.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

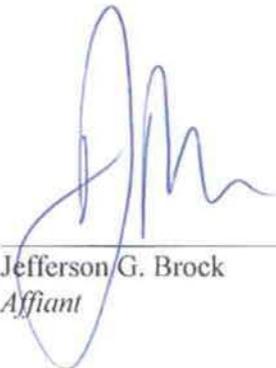
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Threshold Communications to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

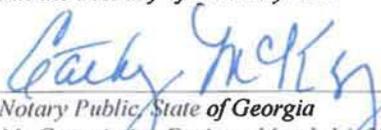
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 21st day of February 2012.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 21st day of February 2012*



Notary Public, State of Georgia
My Commission Expires: March 14, 2015

CERTIFICATE OF SERVICE

I, Donald E. Martin, hereby certify this 22nd day of February, 2012, that I have caused a copy of the foregoing document to be served by United States first class mail upon the following:

David Oxenford, Esquire
Davis Wright Tremaine, LLP
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Washington, D.C. 20006
Counsel for Educational Media Foundation



Donald E. Martin