

KDDK is a full-service commercial Class A FM station, FCC Facility ID # 22310. It is licensed to serve Addis, LA, which is a part of the Baton Rouge Metro Area.

KDDK is fully spaced to first-adjacent WAKH, FCC Facility ID # 58935, in McComb, MS. Both stations are protected to their 60 dBu f(50,50) contours, and the interfering signal is 54 dBu f(50,10) for both.

WAKH is a Class C1 station with an antenna height above average terrain that is substantially less than the maximum for its class. Specifically, Class C1 is permitted up to 100 kW Effective Radiated Power (ERP) at 299 m Above Average Terrain (AAT), but the WAKH antenna is only 149 m AAT.

WAKH was not granted under the §73.215 short-spacing rule. Non-73.215 stations are currently protected as if they were operating with the full allowable facilities for their class.

The area within the actual WAKH 54 dBu f(50,10) is approximately 24,600 km². The area within the class-based 54 dBu f(50,10) contour is approximately 34,900 km². WAKH must therefore be treated by all potential first-adjacent applicants as if its interference area is over 10,000 km² greater than is actually the case.

The class-based WAKH 54 dBu f(50,10) contour falls almost 17 km closer to KDDK than the contour based on the actual WAKH facility.

With specific respect to KDDK, there is existing overlap between the actual KDDK 60 dBu f(50,50) contour and the class-based 54 dBu f(50,10) contour of WAKH. This is permissible because KDDK is fully spaced to WAKH. However, it means that KDDK cannot take advantage of the §73.215 short-spacing rule to move closer to the heart of the metro area. If KDDK were permitted to use this rule based on the actual WAKH facility, it could do so easily.

As shown in the map on the following page, Addis lies between the KDDK transmitter site and Baton Rouge. The 70 dBu f(50,50) contour falls at 16 km from the transmitter, and so KDDK could move more than 16 km toward Baton Rouge and still provide 70 dBu coverage to Addis.

The distance between the KDDK 60 dBu f(50,50) contour and the actual WAKH 54 dBu f(50,10) is about 16 km. On this basis, KDDK could move 16 km closer to Baton Rouge.

The distance from the KDDK transmitter to the minimum separation requirement with WAKH under §73.215 is more than 22 km. This would not impede a move of as much as 16 km toward Baton Rouge.

As a major city and the capital of Louisiana, Baton Rouge has a number of existing towers that KDDK could use for a potential relocation. KDDK has identified several in the Port Allen area that would be usable.

The present population within the KDDK 60 dBu f(50,50) contour is 379,976. Operating from one potential tower in Port Allen, the population within the 60 dBu f(50,50) contour could rise by 128,989 (34%) to 508,965.

Therefore, if the proposals modifying §73.215 in NPRM # 11727 are adopted, KDDK would be permitted to relocate closer to center of the metro area and to provide new service to a significant population.

