APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN AN FM TRANSLATOR OR FM BOOSTER STATION

Section I - General Information

1. Legal Name of the Applicant
   SOUTHERN CALIFORNIA PUBLIC RADIO

   Mailing Address
   480 CEDAR STREET

   City
   ST. PAUL

   State or Country (if foreign address)
   MN

   Zip Code
   55101 -

   Telephone Number (include area code)
   6512901259

   E-Mail Address (if available)
   FCCFILING@MPR.ORG

   FCC Registration Number:
   0005089438

   Call Sign
   K227BX

   Facility Identifier
   155851

2. Contact Representative (if other than Applicant)
   TODD M STANSBURY

   Mailing Address
   1776 K STREET NW

   City
   WASHINGTON

   State or Country (if foreign address)
   DC

   Zip Code
   20006 -

   Telephone Number (include area code)
   2027194948

   E-Mail Address (if available)
   TSTANSBURY@WILEYREIN.COM

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):
   ☐ Governmental Entity ☐ Noncommercial Educational Licensee/Permittee ☐ Other

   ☐ N/A (Fee Required)

4. Facility information:
   a. ☐ FM Translator ☐ FM Booster
   b. Community or communities to which the proposed facility will be licensed:

      | Community(ies) | State |
      |----------------|-------|
      | PALM SPRINGS   | CA    |

5. Application Purpose
   ☐ New station
   ☐ Major Modification of construction permit
   ☐ Major Change in licensed facility
   ☐ Minor Modification of construction permit
   ☐ Minor Change in licensed facility
   ☐ Major Amendment to pending application
   ☐ Minor Amendment to pending application
   a. File number of original construction permit:
      BNPFT-20130325AAF

If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised.
NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided. See General Instruction J.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.

2. **Applicant is:**
   - [ ] an individual
   - [ ] a general partnership
   - [ ] a for-profit corporation
   - [ ] a limited partnership
   - [ ] a not-for-profit corporation
   - [ ] a limited liability company (LLC/LC)
   - [ ] other
     
     a. If "other", describe nature of applicant in an Exhibit. [Exhibit 2]

3. a. Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast. See 47 C.F.R. Section 74.1232(d).

   [ ] Yes  [ ] No

   See Explanation in [Exhibit 3]

   b. Applicant certifies that the FM translator's (a) coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 60 dBu contour is contained within the lesser of: (i) the 2 mV/m daytime contour of the AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the AM primary station's transmitter site.

   [ ] Yes  [ ] No

   See Explanation in [Exhibit 4]

   NOTE: If No to a. and b., and no waiver has been requested in an Exhibit, this application is unacceptable for filing. See 47 C.F.R. Section 74.1232(d).

   If Yes to (a) and No to (b) applicant is prohibited from receiving any support, before or after construction, directly or indirectly, from the licensee/permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).

4. The applicant, if for a commercial FM translator station with a coverage contour extending beyond the protected contour of the commercial primary station being rebroadcast, certifies that it has not received any support, before or after constructing, directly or indirectly, from the licensee/permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).

   [ ] Yes  [ ] No

   See Explanation in [Exhibit 5]

5. For applicants proposing translator rebroadcasts that are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted. **If No, this application is unacceptable for filing.**

6. **Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:

   a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
   
   b. any pending broadcast application in which character issues have been raised.

   [ ] Yes  [ ] No

   See Explanation in [Exhibit 6]
**SECTION III - PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

<table>
<thead>
<tr>
<th><strong>Typed or Printed Name of Person Signing</strong></th>
<th><strong>Typed or Printed Title of Person Signing</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>THOMAS WILLIAM DAVIS</td>
<td>PRESIDENT</td>
</tr>
<tr>
<td>Signature</td>
<td>Date</td>
</tr>
<tr>
<td></td>
<td>2/5/2014</td>
</tr>
</tbody>
</table>
Section III-A - Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: 227
2. Primary Station:
   
   Facility ID Number | Call Sign | City | State |
   --- | --- | --- | --- |
   85911 | KVLA-FM | COACHELLA | CA |

3. Delivery Method (Select One):
   - Off-air
   - Microwave
   - Satellite
   - Via
   - Other

4. Antenna Location Coordinates: (NAD 27)
   
   Latitude:
   - Degrees 33 Minutes 51 Seconds 56
   - North
   - South

   Longitude:
   - Degrees 116 Minutes 26 Seconds 9
   - West
   - East

5. Antenna Structure Registration Number: 1218539
6. Antenna Location Site Elevation Above Mean Sea Level: 445 meters
7. Overall Tower Height Above Ground Level: 14 meters
8. Height of Radiation Center Above Ground Level: 12 meters(H) 12 meters(V)
9. Effective Radiated Power: 0.01 kW(H) 0.01 kW(V)
10. Transmitting Antenna:
    Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://licensing.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search.
    
    - Nondirectional
    - Directional
    - Off-the Shelf
    - Directional composite
    
    Manufacturer ERI Model LPX-1E
    
    Rotation: degrees
    - No Rotation

    Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value |
    --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
    0 | 10 | 20 | 30 | 40 | 50
11. **For FM Boosters and Fill-in translators only.**

   a. **FM Fill-in translators.** Applicant certifies that the FM translator's (a) coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 60 dBu contour is contained within the lesser of: (i) the 2 mV/m daytime contour of the AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the AM primary station's transmitter site.

   - Yes  No  N/A
   - See Explanation in [Exhibit 10]

   b. **FM Boosters.** Applicant certifies that the FM Booster station's service contour is entirely within the primary station's protected coverage contour.

   - Yes  No  N/A
   - See Explanation in [Exhibit 11]

12. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all that apply:

   - Yes  No
   - See Explanation in [Exhibit 12]

   **Overlap Requirements.**
   - a) 47 C.F.R. Section 74.1204
   - Exhibit Required
   
   **Television Channel 6 Protection.**
   - b) 47 C.F.R. Section 74.1205 with respect to station(s)
   - Exhibit Required
   - [Exhibit 13]
   - [Exhibit 14]

13. **Unattended operation.** Applicant certifies that unattended operation is not proposed, or if this application proposes unattended operation, the applicant certifies that it will comply with the requirements of 47 C.F.R. Section 74.1234.

   - Yes  No
   - See Explanation in [Exhibit 15]

14. **Multiple Translators.** Applicant certifies that it does not have any interest in an application or an authorization for an FM translator station that serves substantially the same area and rebroadcasts the same signal as the proposed FM translator station.

   - Yes  No
   - See Explanation in [Exhibit 16]

15. **Environmental Protection Act.** Applicant certifies that the proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required.

   - Yes  No
   - See Explanation in [Exhibit 17]

   By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 4 MUST BE COMPLETED AND SIGNED.
Section IV -- Noncommercial Educational Point System Factors - -New and Major Change Applications on Reserved Channels Only (used to select among mutually exclusive applications for new stations and major modifications) NOTE: Applicants will not received any additional points for amendments made after the close of the application filing window.

<table>
<thead>
<tr>
<th>Preliminary Matter: Does this application provide fill-in service only?</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1. Established Local Applicant: Applicant certifies that for at least the 24 months immediately prior to application, and continuing through the present, it qualifies as a local applicant pursuant to 47 C.F.R. Section 73.7000, that its governing documents require that such localism be maintained, and that it has placed documentation of its qualifications as an established local applicant in a local public inspection file and has submitted to the Commission copies of the documentation.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>2. Diversity of Ownership: Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized radio station (including AM, FM, and non-fill-in FM translator stations, commercial or noncommercial) in which any party to the application has an attributable interest as defined in 47 C.F.R. Section 73.3555, that its governing documents require that such diversity qualification in a local public inspection file and has submitted to the Commission copies of the documentation.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>3. State-wide Network: Applicant certifies that (a) it has NOT claimed a credit for diversity of ownership above: (b) it is one of the three specific types of organizations described in 47 C.F.R. Section 73.7003(b)(3); and (c) it has placed documentation of its qualifications in a local public inspection file and has submitted to the Commission copies of the documentation.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>4. Technical Parameters: Applicant certifies that the numbers in the boxes below accurately reflect the new (increased) area and population that its proposal would serve with a 60 dBu signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) and that it has documented the basis for its calculations in the local public inspection file and has submitted copies to the Commission. Major modification applicants should include the area of proposed increase only (exclude the station's existing service area). (Points, if any, will be determined by FCC)</td>
<td>Yes</td>
<td>No</td>
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| New (increased) area served in square kilometers (excluding areas of water): |
| Population served based on the most recent census block data from the United States Bureau of Census using the centroid method: |

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<tr>
<td>5. Existing Authorizations. a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of relevant broadcast stations. FM translator applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial and FM translator stations other than fill-in stations.</td>
</tr>
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</table>

(number of attributable commercial and non-commercial licenses and construction permits)

b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of FM translators.

| Pending Applications. a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, pending applications for new or major changes to the following number of relevant broadcast stations, AM and FM, commercial and non-commercial and FM translator stations other than fill-in stations. |

(number of attributable commercial and non-commercial applications)

b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date of filing, existing authorizations for the following number of FM translators.

Section VI -- Certification
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing
THOMAS WILLIAM DAVIS

Typed or Printed Title of Person Signing
PRESIDENT

Signature

Date
2/5/2014

Exhibits

Exhibit 13
Description: EXHIBIT 13

INTERFERENCE CONSIDERATIONS

THIS EXHIBIT CONSISTS OF THE FOLLOWING:

TEXT

FIGURE 1, CO-CHANNEL INTERFERENCE CONSIDERATIONS

FIGURE 2A, FIRST ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS

FIGURE 2B, FIRST ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS

FIGURE 3, SECOND AND THIRD ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS

FIGURE 4, SECOND AND THIRD ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS

Attachment 13

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<tr>
<td>EXHIBIT 13</td>
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Exhibit 17
Description: COMPLIANCE WITH INVIROMENTAL RULES

THE ANTENNA SYSTEM FOR THE PROPOSED FM TRANSLATOR WILL BE MOUNTED ON AN EXISTING SUPPORTING STRUCTURE. UNDER SECTION 1.1307(B) OF THE COMMISSION'S RULES, THE PROPOSED FM TRANSLATOR IS EXEMPT FROM ROUTINE EVALUATION WITH RESPECT TO RADIOFREQUENCY RADIATION BECAUSE THE EFFECTIVE RADIATED POWER DOES NOT EXCEED 100 WATTS. THE APPLICANT WILL OPERATE THE PROPOSED FM TRANSLATOR AT REDUCED POWER, OR TEMPORARILY CEASE OPERATION, AS MAY BE REQUIRED TO PROTECT ALL WORKERS FROM EXPOSURE TO HAZARDOUS LEVELS OF RADIOFREQUENCY RADIATION.

Attachment 17
EXHIBIT 13

Interference Considerations

This application for modification of construction permit File Number BNPFT-20130325AAF for FM Translator K227BX, Palm Springs, California, requests a change in the location of the FM translator antenna to a nearby registered tower, Antenna Structure Registration No. 1218539. The proposed modified translator would operate with 10 watts effective radiated power employing a nondirectional antenna.

The geographical coordinates (NAD27) of the proposed FM translator site are as follows:

North Latitude  33° 51’ 56”
West Longitude  116° 26’ 09”.

At this site the ground elevation is 445 meters above mean sea level. The height of the proposed translator antenna above ground is 12 meters.

The proposed modified operation of K227BX conforms with the requirements of Section 74.1204 of the Commission’s Rules for a Class D station on Channel 227 with respect to overlap of predicted contours with the licensed operation of any FM station, LPFM station or FM translator, and the operation of any such facilities specified in a construction permit or pending application, on the same channel and on the first adjacent channels, as shown in this Exhibit. The proposed FM translator site is located within the predicted protected contours of the licensed and proposed operation of one FM station on a second adjacent channel, and within the predicted protected contour of one FM station on a third adjacent channel. This Exhibit also demonstrates that, under Section 74.1204(d) of the Rules, no objectionable interference will be caused to either of these stations. The proposed translator therefore would not result in objectionable interference to any station.

Figure 1 of this Exhibit shows the pertinent predicted contours for the proposed FM translator and co-channel stations KHTS-FM, El Cajon, California, on Channel 227B; and KBHR(FM), Big Bear City, California, on Channel 227A.

The pertinent predicted contours for the proposed FM translator and first-adjacent-channel station KCBS-FM, Los Angeles, California, on Channel 226B; and FM Translator K226BT, Indio, California, on first adjacent Channel 226D; are shown in Figures 2A and 2B of this Exhibit.
EXHIBIT 13 (continued)

Interference Considerations

Figure 3 of this Exhibit depicts the location of the proposed FM translator site with respect to the predicted protected contours of the nearby FM stations and the pending application on the second and third adjacent channels. As shown in Figure 3, the proposed site is located within the 54 dBu F(50,50) contours for both the licensed operation of Class B station KCLB-FM, Coachella, California, on Channel 229B, and the proposed operation of KCLB-FM on Channel 229B specified in application File Number BPH-20130912AAT; and also within the 60 dBu F(50,50) contour for Class A station KKUU(FM), Indio, California, on Channel 224A.

The potential for interference from the proposed FM translator to the licensed and proposed operation of KCLB-FM and to KKUU(FM) was evaluated by determining the three-dimensional volume in which the ratio of undesired to desired signal between the proposed translator and each of these stations equals or exceeds 40 dB, using free space propagation calculations for the translator signal.

With respect to the licensed operation of KCLB-FM, the predicted F(50,50) signal of KCLB-FM at the proposed FM translator site is 83.7 dBu, and interference would occur where the translator signal is 123.7 dBu or greater; for the proposed operation of KCLB-FM the predicted F(50,50) KCLB-FM signal at the proposed translator site is 90.8 dBu, and interference would occur where the translator signal is 130.8 dBu or greater. In the case of KKUU(FM), the predicted F(50,50) KKUU(FM) signal at the proposed FM translator site is 80.1 dBu, and interference would occur where the translator signal is 120.1 dBu or greater.

Computations show that, for operation at 10 watts effective radiated power and assuming uniform radiation from the proposed FM translator in all directions, interference to KKUU(FM) would not extend beyond a distance of 22 meters from the translator antenna in any direction.

The map of Figure 4 of this Exhibit is the USGS 7-1/2-minute topographic map showing the vicinity of the proposed FM translator site. The site is at the Edom Hill "antenna farm," and the area in the immediate vicinity of the proposed site is vacant land. This application conforms with the requirements of Section 74.1204(d) of the Commission’s
EXHIBIT 13 (continued)

Interference Considerations

Rules, as the three-dimensional space within which interference to KKUU(FM) and the licensed and proposed operation of KCLB-FM may be expected does not include any places that could be considered populated, or any streets and highways, and the proposed FM translator therefore would not result in objectionable interference to KKUU(FM) or KCLB-FM.

The predicted contours shown in this Exhibit were determined in accordance with the requirements of Section 73.313 of the Commission’s Rules, from computerized calculations based on the NGDC 30-second terrain database and Figures 1 and 1a of Section 73.333 of the Rules. Distances to contours were calculated at azimuthal increments of one degree.

Fred W. Volken
Engineering Consultant

February 4, 2014
Sierra Madre, California
EXHIBIT 13 (continued)
Interference Considerations

FIGURE 1
Co-Channel Interference Considerations

KBHR(FM) 50 dBu F(50,50)

KBHR(FM) 40 dBu F(50,10)

PROPOSED K227BX 227D
Proposed K227BX 60 dBu F(50,50)
Proposed K227BX 40 dBu F(50,10)
Proposed K227BX 34 dBu F(50,10)

KHTS-FM 40 dBu F(50,10)

SAN BERNARDINO CO.
RIVERSIDE CO.
California
SAN DIEGO CO.
IMPERIAL CO.

KHTS-FM 54 dBu F(50,50)

Latitude: N33°00'00.00''
Longitude: W117°00'00.00''

Reference grid spacing - 30 min.

KILOMETERS

-25 0 25
EXHIBIT 13 (continued)
Interference Considerations

FIGURE 2B
First Adjacent Channel Interference Considerations

SAN BERNARDINO CO.

RIVERSIDE CO.

CALIFORNIA

Proposed K227BX 2270
60 dBu F(50,50)

Proposed K227BX
54 dBu F(50,10)

K226BT 2260
60 dBu F(50,50)

K226BT
54 dBu F(50,10)

N33°37'30.00"
W116°30'00.00"

Reference grid spacing - 7.5 min.
EXHIBIT 13 (continued)
Interference Considerations

FIGURE 4
Second and Third Adjacent Channel Interference Considerations

Map consists of portion of Cathedral City, Calif. (1958, Photorevised 1981), USGS 7-1/2 minute topographic quadrangle. Contour interval 20 feet (dashed lines represent 10-foot contours).