

**FEDERAL COMMUNICATIONS COMMISSION**

**445 12<sup>th</sup> STREET SW  
WASHINGTON DC 20554**

**APR 20 2012**

**MEDIA BUREAU  
AUDIO DIVISION  
APPLICATION STATUS: (202) 418-2730  
HOME PAGE: [www.fcc.gov/mb/audio](http://www.fcc.gov/mb/audio)**

**PROCESSING ENGINEER: Tung Bui  
TELEPHONE: (202) 418-2722  
FACSIMILE: (202) 418-1410  
MAIL STOP: 1800B3  
INTERNET ADDRESS: [tung.bui@fcc.gov](mailto:tung.bui@fcc.gov)**

Citicasters Licenses, Inc.  
2625 S. Memorial Drive, Suite A  
Tulsa, OK 74129

In re: Citicasters Licenses, Inc.  
KKBW(FM), Eatonville, WA  
Facility I.D. No.: 3915  
Request for confirmation of compliance with  
47 C.F.R. § 73.1125

Dear Licensee:

This refers to your attorney's letter requesting confirmation that the main studio location of KKBW, Eatonville, WA, complies with 47 C.F.R. § 73.1125. The letter included a supplemental showing of technical statements and studies which use an alternate propagation methodology to demonstrate that the main studio location is within the 70 dBu field strength contour for the facilities specified by KKBW's license BLH-20020117AAM, as required by 47 C.F.R. § 73.1125. The main studio is located at 950 Pacific Avenue, Tacoma, WA (47° 15' 13" N.L., 122° 26' 20" W.L.).

The engineering study which KKBW submitted calculated the desired field strength contours using the Institute of Telecommunications Sciences Irregular Terrain Model, also known as the "Longley-Rice" model, permitted by 47 C.F.R. § 73.313(e) and (f). Your study indicates that the 950 Pacific Avenue location lies within the 70 dBu contour as defined using the Longley-Rice prediction methodology. Furthermore, the exhibit demonstrates that the distance to KKBW's authorized 70 dBu field strength contour exceeds the distance to the 70 dBu field strength contour as calculated using the F(50,50) propagation curves by approximately 30% along the azimuth from KKBW's transmitter location in the direction of the proposed main studio.<sup>1</sup> Therefore, your engineering showing was referred to the Commission's Office of Engineering and Technology (OET) for a detailed propagation analysis.

By way of a Memorandum dated April 16, 2012, the OET confirmed that the main studio location is encompassed by the 70 dBu field strength contour of the facilities specified in KKBW's license. Accordingly, we find that KKBW's main studio location would be in compliance with 47 C.F.R. § 73.1125.

Sincerely,



Rodolfo F. Bonacci  
Assistant Chief  
Audio Division  
Media Bureau

cc: Marissa G. Repp, Esq.

<sup>1</sup> By policy, the extension must be 10 % or more for referral to OET for analysis.