

**FEDERAL COMMUNICATIONS COMMISSION**

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Capstar TX LLC  
2625 S. Memorial Drive, Suite A  
Tulsa, OK 74129

In re: KPHT(FM), Rocky Ford, CO  
Facility ID No.: 87658  
Capstar TX LLC  
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 KPHT, Rocky Ford, CO, 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 KPHT's license BMLH-20080204ACH, as required by 47 C.F.R. § 73.1125. The main studio is located at 106 West 24<sup>th</sup> Street, Pueblo, CO 81003. (38° 17' 28" N.L., 104° 36' 30" W.L.).

The engineering study which KHPT 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 106 West 24<sup>th</sup> Street location lies within the 70 dBu contour as defined using the Longley-Rice prediction methodology. Furthermore, the exhibit demonstrates that the distance to KPHT'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 161% along the azimuth from KPHT'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 September 12, 2012, the OET confirmed that the main studio location is encompassed by the 70 dBu field strength contour of the facilities specified in KPHT's license. Accordingly, we find that KPHT'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.