

SERVICES DIVISION



March 29, 2012

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RECEIVED

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

FILED/ACCEPTED

**Attention: Audio Division,
Media Bureau**

MAR 29 2012

Federal Communications Commission
Office of the Secretary

**Re: Citicasters Licenses, Inc.
FRN: 0018273367
KKBW(FM), Eatonville, WA
Facility ID No. 3915
Request for Main Studio Location Compliance Determination**

Dear Ms. Dortch:

On behalf of Citicasters Licenses, Inc., the licensee of KKBW(FM), Eatonville, Washington, Facility ID No. 3915 (the "Station"), this letter is to request that the Commission determine that the proposed relocation of the Station's main studio to 950 Pacific Avenue, Tacoma, Washington, complies with the main studio location requirements of 47 C.F.R. Section 73.1125(a)(2), as established by the attached Technical Statement employing Longley-Rice methodology.

Please direct communications regarding this submission to the undersigned in addition to the licensee.

Respectfully submitted,

REPP LAW FIRM

A handwritten signature in blue ink, appearing to read 'Marissa G. Repp'.

Marissa G. Repp

Attorney for Citicasters Licenses, Inc.

Attachment

cc: KKBW(FM) Public Inspection File

Technical Statement
Facility ID Number 3915
Studio Rule Compliance Determination Request
March 29, 2012

This technical statement has been prepared in support of a request for Determination of Compliance with the Main Studio Rule, Section 73.1125 for station KKBW, Eatonville, Washington. This Technical Exhibit demonstrates that the proposed main studio location is within the 70 dBu field strength contour of the permitted facility as required by Section 73.1125, based on current FCC guidelines regarding the use of alternate terrain showings.¹

The proposed studio location is 950 Pacific Avenue Tacoma, Washington, which lies along the 343° True radial from the transmitter. Figure 1 below is a table for this radial, and the immediate 5 adjacent radials. The FCC 60, and 70 dBu contour distance is given, along with the Longley Rice derived 70 dBu distance, and a value representing the percentage of difference between the FCC and the Longley Rice distances. From this table it can be determined that the supplemental methodology is warranted based upon percentage by which the Longley Rice value extends beyond the standard FCC value.

Attached as Figure 2 is a map showing the 60, and 70 dBu FCC standard contours, the Longley Rice determined 70 dBu contour, the proposed main studio location, as well as the principal community. The assumptions used in Longley Rice calculations are also shown on this map. The microcomputer program Probe 4 was used to in all calculations.

Troy G. Langham
FCC Engineering Supervisor
March 28, 2011

¹ FCC DA 10-1760

Figure 1.

Azimuth (deg)	HAAT (m)	FCC 60 dBu	FCC 60 dBu	Longley Rice 70 dBu	Change %
338	360.3	56.01	36.03	55.9	55.15%
339	360.4	56.42	36.37	52.5	44.35%
340	360.3	56.8	36.69	53	44.45%
341	363.4	57.46	37.21	51.1	37.33%
342	365.6	58.04	37.69	57.9	53.62%
343	365.8	58.5	38.06	49.3	29.53%
344	365.2	58.89	38.39	58.8	53.16%
345	363.9	59.23	38.67	58.9	52.31%
346	361.6	59.09	38.56	53.2	37.97%
347	358.5	58.89	38.41	53.4	39.03%
348	355.8	58.72	38.28	53	38.45%
Average of Distance Difference					44.12%

Figure 2

