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2013 MAR 25 4 6:50

March 20, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

--VIA HAND DELIVERY--

FILED/ACCEPTED

MAR 21 2013

Federal Communications Commission
Office of the Secretary

Re: KOUW(FM), Island Park, ID

Dear Ms. Dortch:

This is to advise the Commission of RP Broadcasting LS, LLC's new main studio location for KOUW(FM), Island Park, ID (Facility ID No. 83882) at:

1406 Commerce Way
Idaho Falls, ID 83401

The coordinates of the proposed main studio location are N43-31-58, W112-00-17 (NAD 27). The new main studio location is located within the station's city grade contour, as confirmed by the attached engineering study.

Respectfully submitted,

RP BROADCASTING LS, LLC

By: 

A. Wray Fitch, III
Its Attorney

Enclosure (as stated)

cc: Richard Mecham (with enclosure, for public file)

FILED/ACCEPTED

MAR 21 2013

Federal Communications Commission
Office of the Secretary

February 11, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RP Broadcasting LS, LLC
1401 E. Stillwood Dr
Salt Lake City, UT 84117

Ms. Dortch:

RP Broadcasting LS, LLC, ("Rich Broadcasting") licensee of radio station KOUW(FM) Island Park, ID (FCC Facility ID #83882), hereby submits the instant engineering exhibit for the purpose of demonstrating that Rich Broadcasting's proposed main studio location for KOUW(FM) complies with 47 C.F.R. Section 73.1125.

Rich Broadcasting proposes to locate the KOUW(FM) main studio at 1406 Commerce Way, Idaho Falls, ID, 83401. The coordinates of the proposed main studio location are N43-31-58, W112-00-17 (NAD 27). Although this proposed main studio location is not within the station's community of license, Island Park, ID, or within 25 miles of the reference coordinates of Island Park, the instant exhibit demonstrates that, by using the Longley-Rice alternative propagation model, the proposed main studio location is within the principal community coverage of KOUW(FM).

The previous two licensees of KOUW(FM) operated the station's main studio at 325 River Parkway in Idaho Falls relying on a similar alternate propagation study. Rich Broadcasting wishes to point out that the instantly proposed main studio location is located 8 km closer to the KOUW(FM) antenna site than the current main studio location on the same 202 degree azimuth (See Exhibit 1).

As can be seen in Exhibit 1, the proposed KOUW(FM) proposed main studio, is located outside the FCC predicted F(50,50) 70 dBu contour on the 202 degree radial.¹ As shown in Exhibit 1, the F(50,50) 70 dBu community coverage contour is predicted to extend a radial distance of approximately 65.0 kilometers on the 202 degree radial towards – short of the proposed main studio location.

Even though the FCC predicted F(50,50) 70 dBu contour does not encompass the proposed main studio location, due to the drastic change in elevation between the transmitter site and this location, higher field strengths would be expected over the proposed main studio than what FCC predicted contours would show. Therefore, the Longley-Rice alternate propagation model has been used to verify this expectation.

As can be seen on the map in Exhibit 2, the last occurrence 73 dBu coverage contour, as predicted by Longley-Rice using the software code and input parameters as

¹ The predicted coverage contours for the proposed operation were calculated in accordance with the provisions of Section 73.313. Pursuant with current FCC practice, the distances to the contours were calculated without consideration given to terrain roughness correction factors. The average terrain elevations from 3 to 16 kilometers along eight radials evenly spaced at 45 degree intervals were obtained from the 30-second N.G.D.C. terrain database. The terrain elevations were then used in combination with the effective radiated power for determining the distances to coverage contours.

suggested by OET Bulletin 69, actually extends 126.7 kilometers on the 202 degree radial from the transmitter site, thereby easily covering the proposed main studio location by an additional 6 km. The proposed main studio location enjoys line of sight from the antenna site.

The topographic profile in Exhibit 3 further bolsters this assessment and shows that Longley-Rice actually predicts better than 74 dBu signal at the main studio. The topographic profile in Exhibit 4 demonstrates that Longley-Rice predicts that a 70 dBu signal extends approximately 139.3 km from the antenna site on the 202 degree contour - an additional 16.5 km beyond even the proposed main studio.

Compliance with the Commission's current staff policies with respect to the application of the Longley-Rice alternate propagation model is met:

- The radial distance to the 70 dBu Longley-Rice propagation model contour exceeds the distance to the FCC F(50,50) 70 dBu contour by more than ten percent. In this case, the 70 dBu Longley-Rice propagation model Mean Occurrence contour exceeds the distance to the FCC F(50,50) 70 dBu contour by more than 61 km on the 202 degree radial (see Exhibit 2).
- The previously required "delta-h" variable along the 202 degree radial is 453.57 meters when considering the elevations extending

from 10 kilometers to 50 kilometers from the licensed KOUW(FM) transmitter site. This complies with the previous Commission policy requiring a “delta-h” of less than 20 meters or greater than 100 meters in order to utilize an alternate propagation method to determine coverage such as Longley-Rice or FM Point to Point.

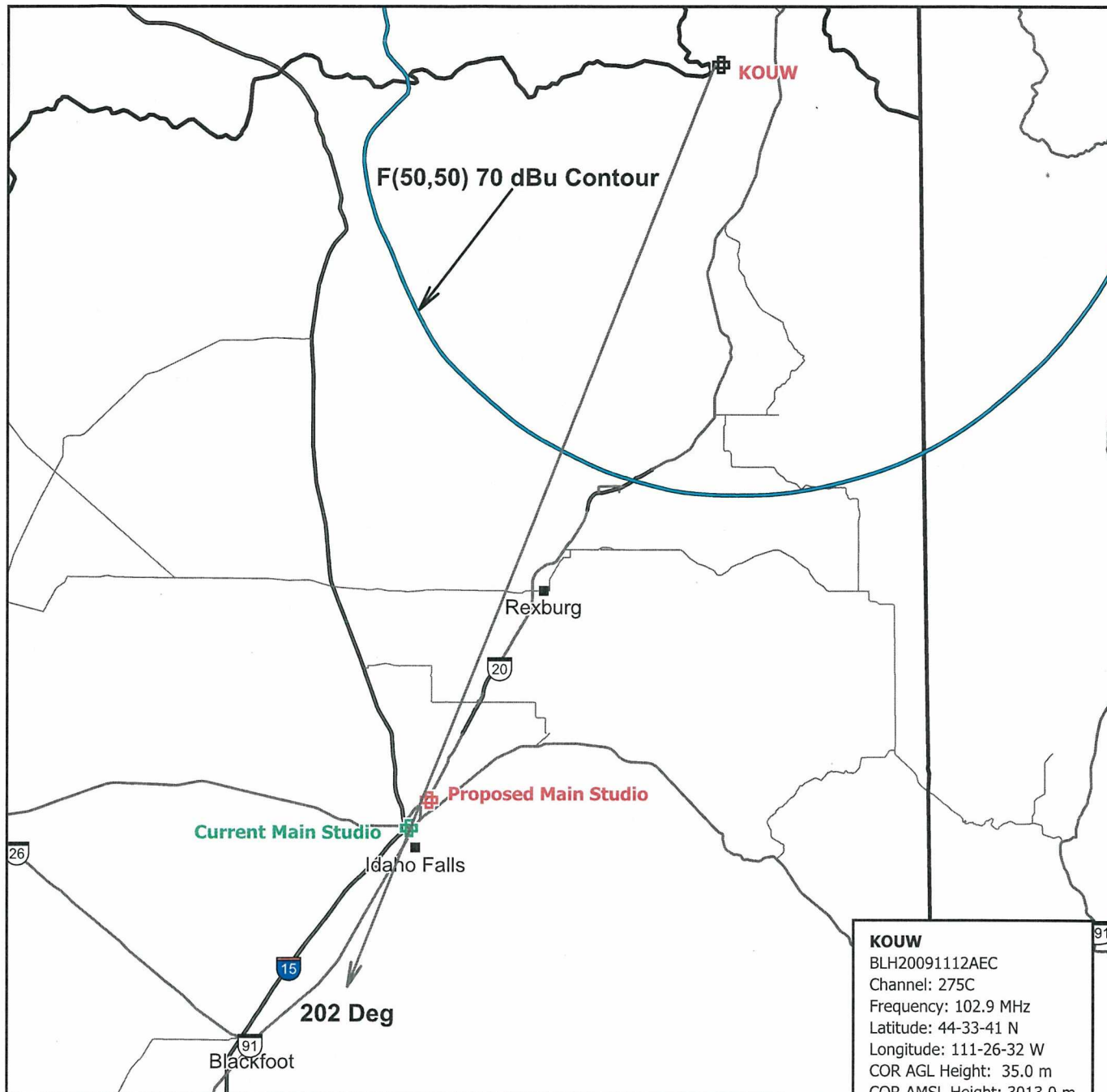
In conclusion, it is the undersigned’s opinion that the proposed main studio location easily complies with Section 73.1125

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Terry', written over a horizontal line.

Kevin Terry
Technical Consultant to:
RB Broadcasting LS, LLC

Exhibit 1
FCC F(50,50) 70 dBu
Contour Map

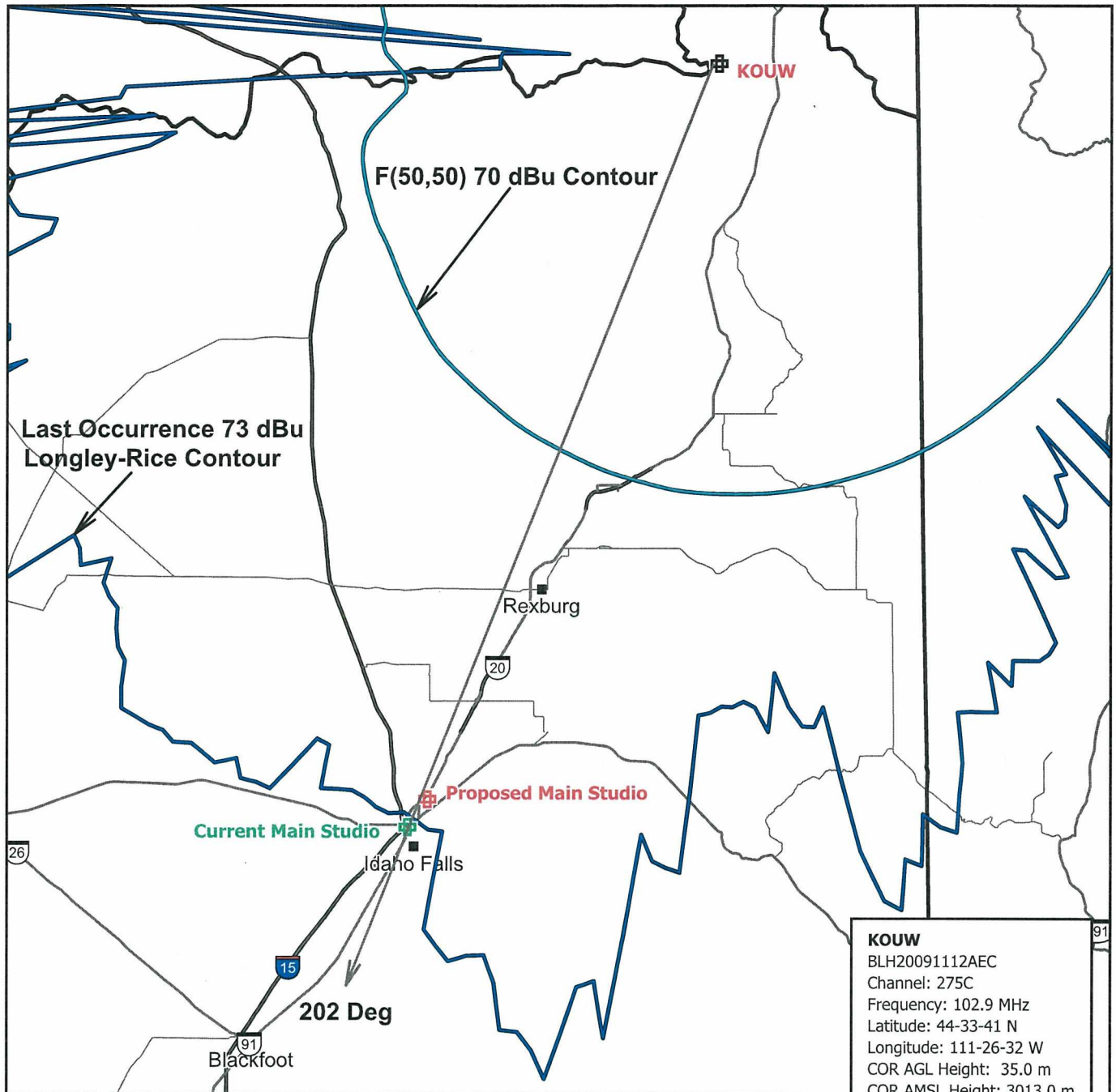


KOUW

BLH20091112AEC
Channel: 275C
Frequency: 102.9 MHz
Latitude: 44-33-41 N
Longitude: 111-26-32 W
COR AGL Height: 35.0 m
COR AMSL Height: 3013.0 m
Base Elevation: 2978.0 m
COR HAAT: 842.0 m
ERP: 37.00 kW
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

Exhibit 2

**Longley-Rice
Last Occurrence
73 dBu Contour Map**



KOUW

BLH20091112AEC
Channel: 275C
Frequency: 102.9 MHz
Latitude: 44-33-41 N
Longitude: 111-26-32 W
COR AGL Height: 35.0 m
COR AMSL Height: 3013.0 m
Base Elevation: 2978.0 m
COR HAAT: 842.0 m
ERP: 37.00 kW
Horiz. Pattern: Omni
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Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

Scale 1:900,007

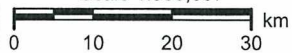
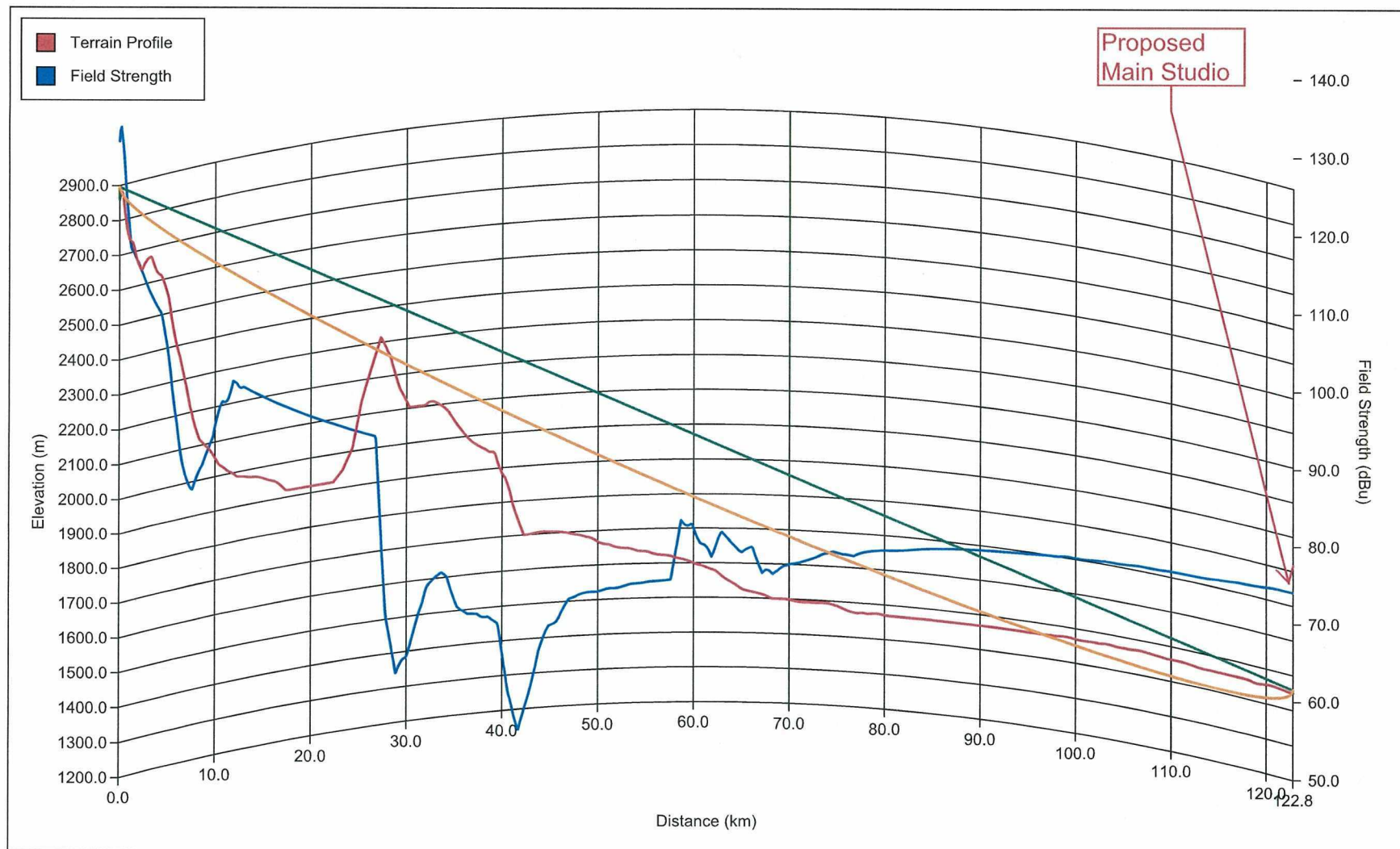


Exhibit 3

**Line of Sight to
Proposed Main Studio**



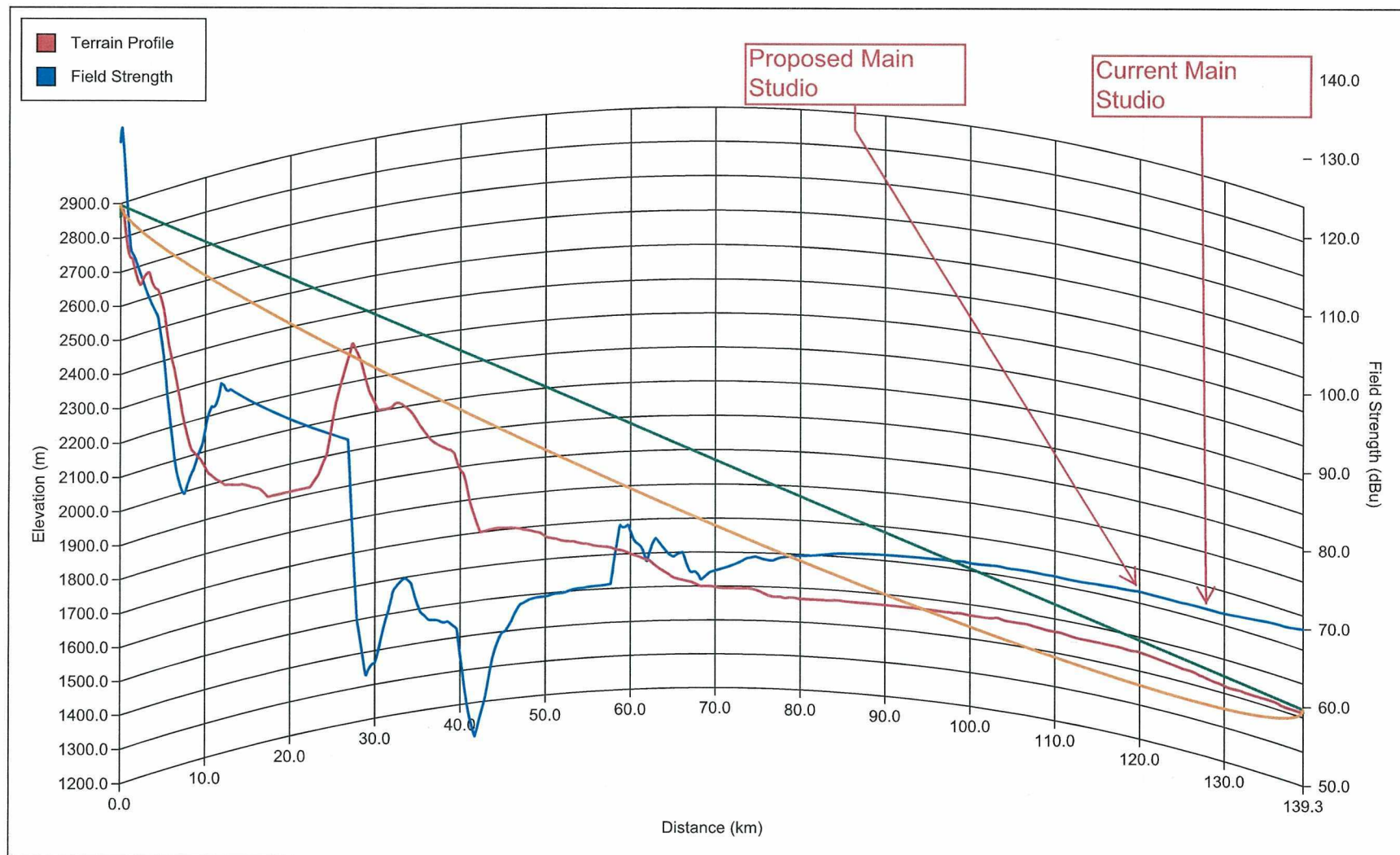
Start Latitude: 44-33-41 N
Start Longitude: 111-26-32 W

End Latitude: 43-32-05.76 N
End Longitude: 112-00-37.61 W

Distance: 122.8 km
Bearing: 201.96 deg

Exhibit 4

**Signal Strength on
202 Degree Contour
out 140 km**



Start Latitude: 44-33-41 N
Start Longitude: 111-26-32 W

End Latitude: 43-23-51.19 N
End Longitude: 112-05-21.22 W

Distance: 139.34 km
Bearing: 202.1 deg