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Before the
Federal Communications Commission
Washington, D.C. 20554

2014 MAR 10 A 6:05

Accepted/Filed

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FCC Office of the Secretary

In re Application of)
)
Mixteco/Indigena)
Community Organizing Project)
)
For a New Low Power FM Station)
)
Facility ID No. 194972,)
Oxnard, CA)

File No. BNPL-20131113BOF

Directed to: Office of the Secretary
Attention: Chief, Audio Division, Media Bureau

ADDENDUM TO REPLY TO OPPOSITION TO PETITION TO DENY

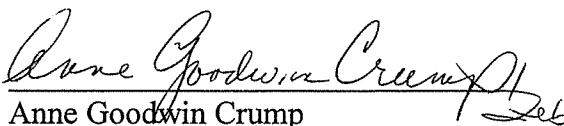
Pacific Broadcasting Company ("Pacific Broadcasting"), licensee of FM broadcast station KDB(FM), Santa Barbara, CA, Facility ID No. 51169, by its attorneys, hereby respectfully submits an Addendum to the Reply to Opposition to Petition to Deny it filed on February 25, 2014, with regard to the application of Mixteco/Indigena Community Organizing Project ("MICOP") for a new low power FM station on Channel 231L1, Oxnard, California (Facility ID No. 194972), File No. BNPL-20131113BOF (the "Application"). Pacific Broadcasting has recognized that this Addendum may be necessary in order to clarify certain references made in the Engineering Report attached to its Reply. Accordingly, to the extent deemed necessary, Pacific Broadcasting hereby requests leave to file the following Addendum. With respect thereto, the following is stated:

As set forth in the attached Engineering Statement, after the submission of Pacific Broadcasting's Reply, its consulting engineer noted that the data submitted by MICOP with

regard to relative vertical plane pattern is inconsistent. Specifically, the data included in the MICOP application , upon which Pacific Broadcasting's engineer relied, differs in significant respects from the data included in the letter from Shively Labs which MICOM attached to its Opposition to Petition to Deny. While Pacific Broadcasting's conclusion that the MICOM facility as proposed would cause interference to KDB remains unchanged, MICOM has provided no means by which the Commission can determine which of the inconsistent sets of data is correct. This lack of clarity provides another basis for dismissal of the application.

Respectfully submitted,

PACIFIC BROADCASTING COMPANY

By: 
Anne Goodwin Crump

Its Attorney

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street - Eleventh Floor
Arlington, Virginia 22209
(703) 812-0400

March 5, 2014

ENGINEERING STATEMENT

This Engineering Statement has been prepared for Pacific Broadcasting Company, licensee of FM Station KDB, Santa Barbara, California. The Statement is to be submitted to the Federal Communications Commission in support of an Addendum to the KDB(FM) Reply to Opposition to Petition to Deny dated February 25, 2014, related to the pending application of Mixteco/Indigena Community Organizing Project for a new LPFM station at Oxnard, California, File Number BNPL-20131113BOF. The abbreviations given to pertinent documents, and other abbreviations, are those used in the KDB(FM) Reply.

A further review of the MICOP LPFM station application and the MICOP Report included with the MICOP Opposition shows that MICOP has provided two different tabulations of relative vertical plane radiation pattern data for the proposed LPFM station antenna on the roof of the 500 Building, with no accompanying explanation. There are substantial differences between the data tabulations in the "107.2 dBu Interfering Contour Spread Sheet" part of Exhibit 11 of the MICOP application and the letter from Shively Labs accompanying the MICOP Report, for the exact same antenna system design parameters.

The discrepancies between data tabulations do not alter the conclusions reached in the material prepared by this engineer for KDB(FM), with respect to predicted interference to KDB(FM) in the 500 Building. The near-field calculations of field strength values in the 500 Building are based on the antenna system design parameters given in the MICOP application and also in the MICOP Report, and not on any tabulation of data; and the discrepancies do not affect the predicted interference in the 300 Building.

The studies of the MICOP application made for KDB(FM) by this engineer are all based on the information contained in the application. If the vertical plane radiation pattern to be considered is actually that provided in the Shively Labs letter, the MICOP application will need to be amended, because the changes would have a substantial impact on the applicant's attempt in the "Spread Sheet" part of Exhibit 11 to show no interference to KDB(FM). In fact, utilization of the data from the Shively Labs letter would show significant predicted interference to KDB(FM) at the location in the 500 Building designated Point A when using the less accurate far-field calculations.

It is therefore necessary for MICOP to verify which data tabulation it has determined to be correct.

Fred W. Volken
Engineering Consultant

February 2014

Sierra Madre, California

Statement of Engineer

FRED W. VOLKEN, whose place of business is located at 348 W. Sierra Madre Blvd., Sierra Madre, California, hereby states that he is a graduate physicist holding the degree Bachelor of Arts from Occidental College, Los Angeles, California; that his qualifications as an engineering consultant are a matter of record with the Federal Communications Commission; that he has prepared, or supervised the preparation of, this document as engineering consultant for Pacific Broadcasting Company, licensee of FM Station KDB, Santa Barbara, California; and that all of the information contained in this document is accurate and correct to the best of his knowledge and ability.

I state under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2014.



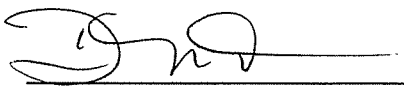
Fred W. Volken

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary in the offices of Fletcher, Heald & Hildreth, P.L.C.,
certify that on this 5th day of March, 2014, I caused a copy of the foregoing Addendum to Reply
to Opposition to Petition to Deny to be served by First Class U.S. Mail to:

Michael Couzens
Michael Couzens Law Office
P.O. Box 3642
Oakland, CA 94609
cuz@well.com

Counsel for Mixteco/Indigena Community Organizing Project

By: 
Deborah N. Lunt