

FEDERAL COMMUNICATIONS COMMISSION

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APR 25 2014

**MEDIA BUREAU
AUDIO DIVISION
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Keys Media Company, Inc.
10144 Seagrape Way
Palm Beach Gardens, FL 33418

In re: WKYZ(FM), Key Colony Beach, FL
Facility I.D. No.: 73170
Keys Media Company, Inc. ("KMC")
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 WKYZ, Key Colony Beach, FL 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 WKYZ's license BLH-20080825AAA, as required by 47 C.F.R. § 73.1125. The main studio is located at 951 Caroline Street, Key West, Florida 33040 (NAD-27: 24° 33' 41" N.L., 81° 47' 57" W.L.).

The engineering study which WKYZ 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 951 Caroline Street location lies within the 70 dBu contour as defined using the Longley-Rice prediction methodology. Furthermore, the exhibit demonstrates that the distance to WKYZ'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 14% along the azimuth from WKYZ's transmitter location in the direction of the proposed main studio.¹ 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 24, 2014, the OET confirmed that the main studio location is encompassed by the 70 dBu field strength contour of the facilities specified in WKYZ's license. Accordingly, we find that WKYZ'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: Joseph A. Belisle, Esq.

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