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September 12, 2014

By United States Postal Service  
Express Mail # EM 604761370 US

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Request for authorization to change location of main studio  
of Station KMJE-FM Facility #36028 (the "Station")

Dear Ms. Dortch:

Lotus Sacramento Corp., a California corporation and licensee of the Station ("Lotus"), hereby requests the written authorization of the Federal Communication Commission (the "Commission"), as required under Section 73.1125(d)(2) of the Commission's rules,<sup>1</sup> to move its main studio to a new location. Both the current main studio location, which the Commission authorized,<sup>2</sup> and the new location are outside the areas specified in Section 73.1125(a) of the Commission rules.<sup>3</sup> However, as demonstrated by the enclosed Supplemental Showing, the new studio location falls within the Station's principal community contour calculated using the

<sup>1</sup> 47 C.F.R. §73.1125(d)(2)

<sup>2</sup> Letter, dated July 21, 2006, from Rodolfo F. Bonacci, Assistant Chief, Audio Division, Media Bureau, to First Broadcasting Sacramento Licensing, LLC, former licensee of the Station.

<sup>3</sup> 47 C.F.R. §73.1125(a)(2) provides, in relevant part, that an FM station's main studio must be located: "(1) Within the station's community of license; (2) At any location within the principal community contour of [the FM] station licensed to the station's community of license; or (3) Within twenty-five miles from the reference coordinates of the center of its community of license."

Longley-Rice contour prediction method, as permitted in this case,<sup>4</sup> and, thus, complies with Section 73.1125(a)(2) of the Commission's rules.

I enclose a copy of Lotus' Form 159 in connection with this filing, as well as confirmation of Lotus' payment of the \$1,050 filing fee. In addition, I enclose a copy of this request as required under Section 1.51 of the Commission's rules.<sup>5</sup>

I have been authorized to state on behalf of Lotus that neither Lotus nor any of its principals is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

Please contact me if you have any questions or concerns regarding this matter. Thank you.

Very truly yours,



Eileen Breslin  
Counsel for Lotus Sacramento Corp.

Enclosures

cc: Mr. Howard A. Kalmenson  
President  
Lotus Sacramento Corp.

Mr. Jerry Roy  
Senior Vice President and Chief Compliance Officer  
Lotus Sacramento Corp.

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<sup>4</sup> 47 C.F.R. §73.313(e) and (f) permit a supplemental showing to be made concerning the contour distances as determined by other means, where, as here, certain criteria are met.

<sup>5</sup> 47 C.F.R. §1.51(c)

**Agency Tracking ID:PGC2565482**  
**Authorization Number:289550**  
**Successful Authorization -- Date Paid: 9/12/14**  
**FILE COPY ONLY!!**

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING  (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION <b>REMITTANCE ADVICE</b> <b>FORM 159</b> PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
<b>SECTION A - Payer Information</b>		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) <b>Lotus Sacramento Corp.</b>		(3) TOTAL AMOUNT PAID (dollars and cents) <b>\$1050.00</b>
(4) STREET ADDRESS LINE NO. 1 <b>3301 Barham Boulevard</b>		
(5) STREET ADDRESS LINE NO. 2		
(6) CITY <b>Los Angeles</b>	(7) STATE <b>CA</b>	(8) ZIP CODE <b>90068</b>
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>323-512225</b>		(10) COUNTRY CODE (IF NOT IN U.S.A.) <b>US</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(11) PAYER (FRN) <b>0023668536</b>		(12) FCC USE ONLY
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)		
(13) APPLICANT NAME <b>Lotus Sacramento Corp.</b>		
(14) STREET ADDRESS LINE NO. 1 <b>3301 Barham Boulevard</b>		
(15) STREET ADDRESS LINE NO. 2		
(16) CITY <b>Los Angeles</b>	(17) STATE <b>CA</b>	(18) ZIP CODE <b>90068</b>
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>323-512225</b>		(20) COUNTRY CODE (IF NOT IN U.S.A.) <b>US</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(21) APPLICANT (FRN) <b>0023668536</b>		(22) FCC USE ONLY
<b>COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET</b>		
(23A) FCC Call Sign/Other ID <b>KMJE-FM</b>	(24A) Payment Type Code(PTC) <b>MPR</b>	(25A) Quantity <b>1</b>
(26A) Fee Due for (PTC) <b>\$1,050.00</b>	(27A) Total Fee <b>\$1050.00</b>	FCC Use Only
(28A) FCC CODE 1	(29A) FCC CODE 2 <b>na</b>	
(23B) FCC Call Sign/Other ID	(24B) Payment Type Code(PTC)	(25B) Quantity
(26B) Fee Due for (PTC)	(27B) Total Fee	FCC Use Only
(28B) FCC CODE 1	(29B) FCC CODE 2	



## Electronic Form 159

### Payment Confirmation

Your transaction has been approved. For your records, please note the following:

<b>AGENCY TRACKING ID:</b>	<b>PGC2565482</b>
<b>AUTHORIZATION NUMBER :</b>	<b>289550</b>
<b>AMOUNT PAID :</b>	<b>\$1,050.00</b>

[PRINT FORM 159](#)[CLOSE](#)

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#### Customer Service

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Policy](#)[FCC Home Page](#)

If you have any questions or concerns please contact your licensing system help desk.

**SUPPLEMENTAL SHOWING  
IN SUPPORT OF A REQUEST FOR  
AUTHORITY TO RELOCATE THE  
MAIN STUDIO LOCATION OF  
KMJE-FM PLACERVILLE, CA  
BLH-20060714AAW**

This supplemental showing was prepared on behalf of Lotus Sacramento Corp. ("Lotus"), a California corporation and licensee of FM broadcast station KMJE-FM ("KMJE") on Channel 221A at Placerville, California, in support of a request for authority to relocate KMJE's main studio pursuant to 47 C.F.R. Section 73.1125(d)(2). KMJE already has Commission approval to maintain a main studio located outside of the boundaries described in Section 73.1125(a), based on a supplemental coverage showing.<sup>1</sup> Lotus now wishes to specify a new studio location for KMJE that also is located outside of those boundaries.<sup>2</sup> The new main studio is located at 1442 Ethan Way, Suite 101, Sacramento, California 95825.<sup>3</sup> Accordingly, this supplemental showing demonstrates that the new studio location complies with Section 73.1125(a) based on utilizing the Longley-Rice supplemental contour-prediction methodology permitted by Section 73.313(e) and (f).<sup>4</sup>

The Commission's main studio rule requires prior written authority to relocate a main studio that is already outside of the aforementioned boundaries to a new location that also exceeds those limits. The new main studio for KMJE is located 3.8 kilometers east of

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<sup>1</sup> Letter to First Broadcasting Sacramento Licensing, LLC (*former licensee of KMJE*), from Rodolfo F. Bonacci, Assistant Chief, Audio Division, Media Bureau, July 21, 2006.

<sup>2</sup> Section 73.1125(a) provides that an FM station's main studio must be located within one of the following locations: (1) the station's community of license; (2) within 25 miles from the center of the community of license; or, (3) at any location within the principal community of any station, of any service, licensed to the station's community of license.

<sup>3</sup> The new main studio is located at geographical coordinates N 38° 35' 32", W 121° 25' 10" NAD 83. The conversion from NAD 83 to NAD 27, using NADCON Program Version 2.11, results in the following coordinates: N 38° 35' 32.3", W 121° 25' 06.2".

<sup>4</sup> Institute of Telecommunications Sciences (ITS) Irregular Terrain Model, September 1984, version 1.2.2. See *also* Rice, P.L., Longley, A.G., Norton, K.A., Barsis, A.P., Transmission Loss Predictions for Tropospheric Communications Circuits, NBS Technical Note 101 (Revised), Volume I and II, U.S. Department of Commerce, 1967.

the authorized location as depicted in Figure 1, which is closer to the KMJE's transmitter site. Distance and bearing from KMJE's transmitter to the authorized main studio location is 71.9 kilometers and 267.0 degrees, while the closer new studio is 68.2 kilometers and 266.1 degrees, respectively. As can be observed in Figure 2, KMJE's transmitter is situated on a mountaintop at 963 meters above mean sea level (AMSL), which overlooks the low and smooth sloping valley where the new main studio is located at 11 meters AMSL. Figure 2 also indicates that KMJE's antenna height above average terrain (HAAT) using an extended radial towards the new main studio location varies by 43 percent from the HAAT obtained from the standard 3 to 16 kilometer average.

The Commission will generally allow an alternate propagation model to be used to determine compliance with the main studio location rule provided a showing is made to establish (1) the terrain between the transmitter site and the new studio location widely departs from the 50 meters standard in compliance with Section 73.313(f)<sup>5</sup> and (2) the distance to the 70 dBu contour as determined by the supplemental method is at least 10 percent larger than the distance predicted by the standard contour method.<sup>6</sup> Plots of the terrain elevation profiles showing the pertinent segment from 10 to 50 kilometers from the KMJE transmitter site towards the new main studio location and at azimuths plus and minus one degree are provided as Figures 3 thru 5. For each of the three terrain profiles, the calculated terrain roughness factor ( $\Delta h$ ) is greater than 400 meters. This determination establishes that the "terrain departs widely," which satisfies the first criterion.

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<sup>5</sup> The Commission's F(50,50) propagation curves used as the standard method for coverage prediction assumes a delta  $h$  ( $\Delta h$ ) value of 50 meters. See Section 73.313(i). In the unpublished decision, *Cumulus Licensing Corp.*, Letter, Aug. 8, 2003, the Audio Division staff in coordination with the Office of Engineering and Technology (OET) established the following guidelines to define "terrain departs widely":

- (1) Where the  $\Delta h$  is used as the sole determinant that the terrain along a radial widely departs from the 50 meter standard, a  $\Delta h$  of 20 meters or less, or 100 meters or more is required.
- (2) Where the antenna height above average terrain (HAAT) along the radial towards the studio location (using an extended radial) varies by more than 30% from the HAAT derived from the standard 3 to 16 km average.

<sup>6</sup> *Certain Minor Changes Without a Construction Permit*, FCC 97-270, 12 FCC Rcd at 12102 n.53, "...in instances involving unusual terrain characteristics which depart widely from the 3 to 16 km segment...supplemental showings have been, and will continue to be, considered only where the applicant shows that the location of the FM contour as predicted by the supplemental method is at least 10 percent greater than the same contour as predicted by the standard method."

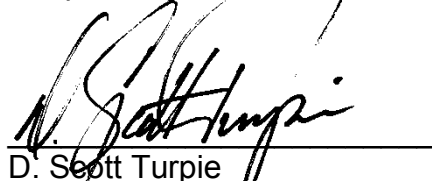
Figure 6 is a contour map that depicts the coverage comparison between the standard and Longley-Rice prediction methods. Listed below are the Longley-Rice analysis settings:

Transmit location elevation in meters (AMSL): 929  
Transmit antenna type: nondirectional  
Transmit antenna height in meters (AGL): 34  
Receive location elevation in meters (AMSL): 11  
Receive antenna type: nondirectional  
Receive antenna height in meters (AGL): 9.1  
Cell size (km/side): 0.5  
Terrain profile step size (km): 0.5  
Terrain database: 3 arc-seconds

This map demonstrates that the 70 dBu contour as predicted by the Longley-Rice method extends 55.7 percent farther than the 70 dBu contour predicted by the standard method. This meets the second criterion since the contour distance predicted using the supplemental method is more than 10 percent larger than the distance predicted by the standard method. Since the coverage map further shows that the new studio location is completely encompassed by the “extended” 70 dBu contour of KMJE as derived from the Longley-Rice method, Lotus’ request to relocate the main studio is consistent with the Commission’s studio location rule in Section 73.1125(a).

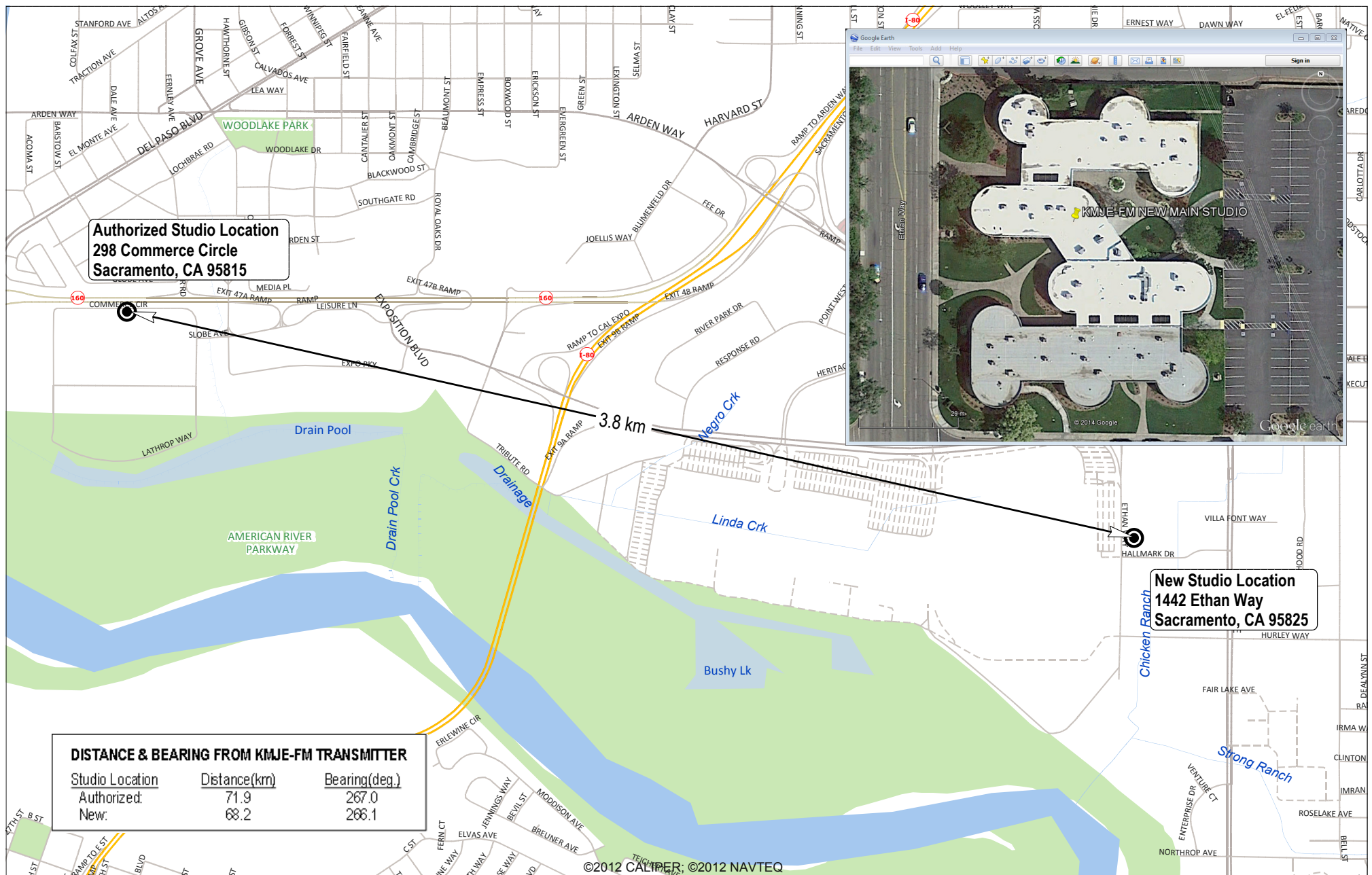
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. This exhibit was executed on September 9, 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Scott Turpie", is written over a horizontal line.

D. Scott Turpie  
Technical Consultant  
P.O. Box 881  
Silver Spring, MD 20918-0881  
Ph. 301-776-4488



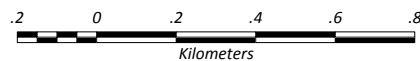


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P.O. Box 881 Silver Spring, Maryland 20918-0881

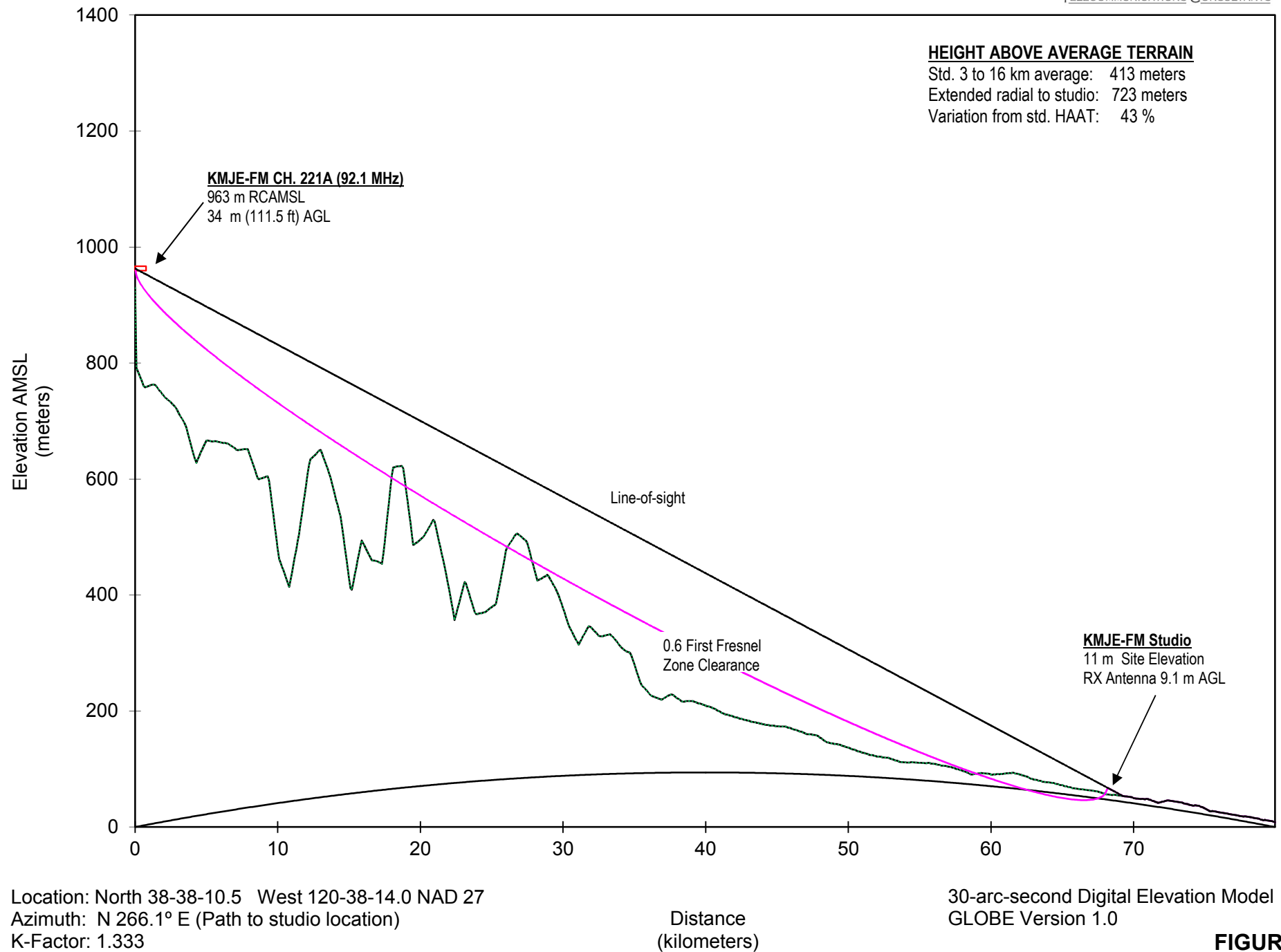
Scale



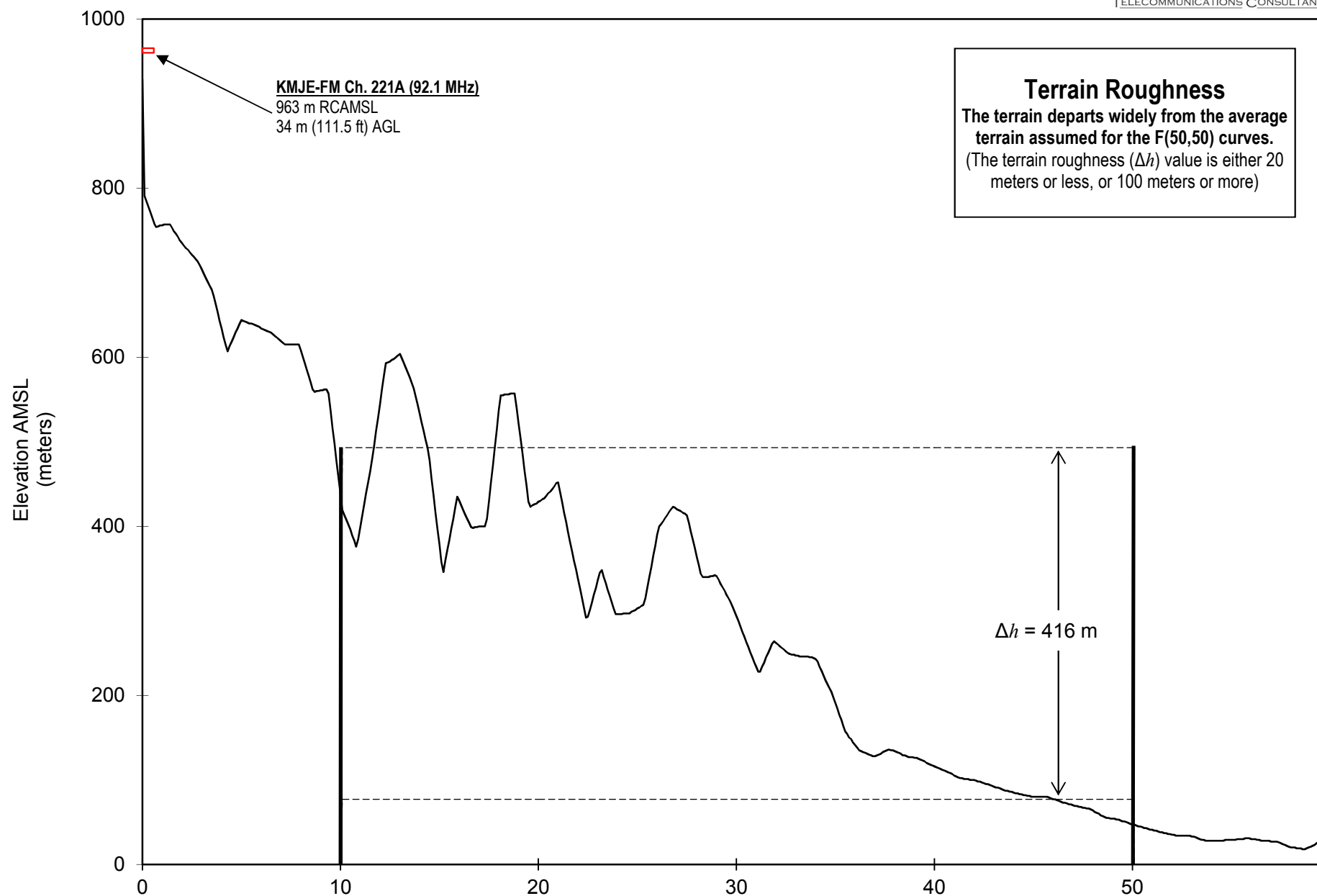
**FIGURE 1**  
**AUTHORIZED & NEW STUDIO LOCATION**  
**KMJE-FM 6.0 kW ERP 100 M HAAT**  
**PLACERVILLE, CALIFORNIA**

September 2014





**FIGURE 2**

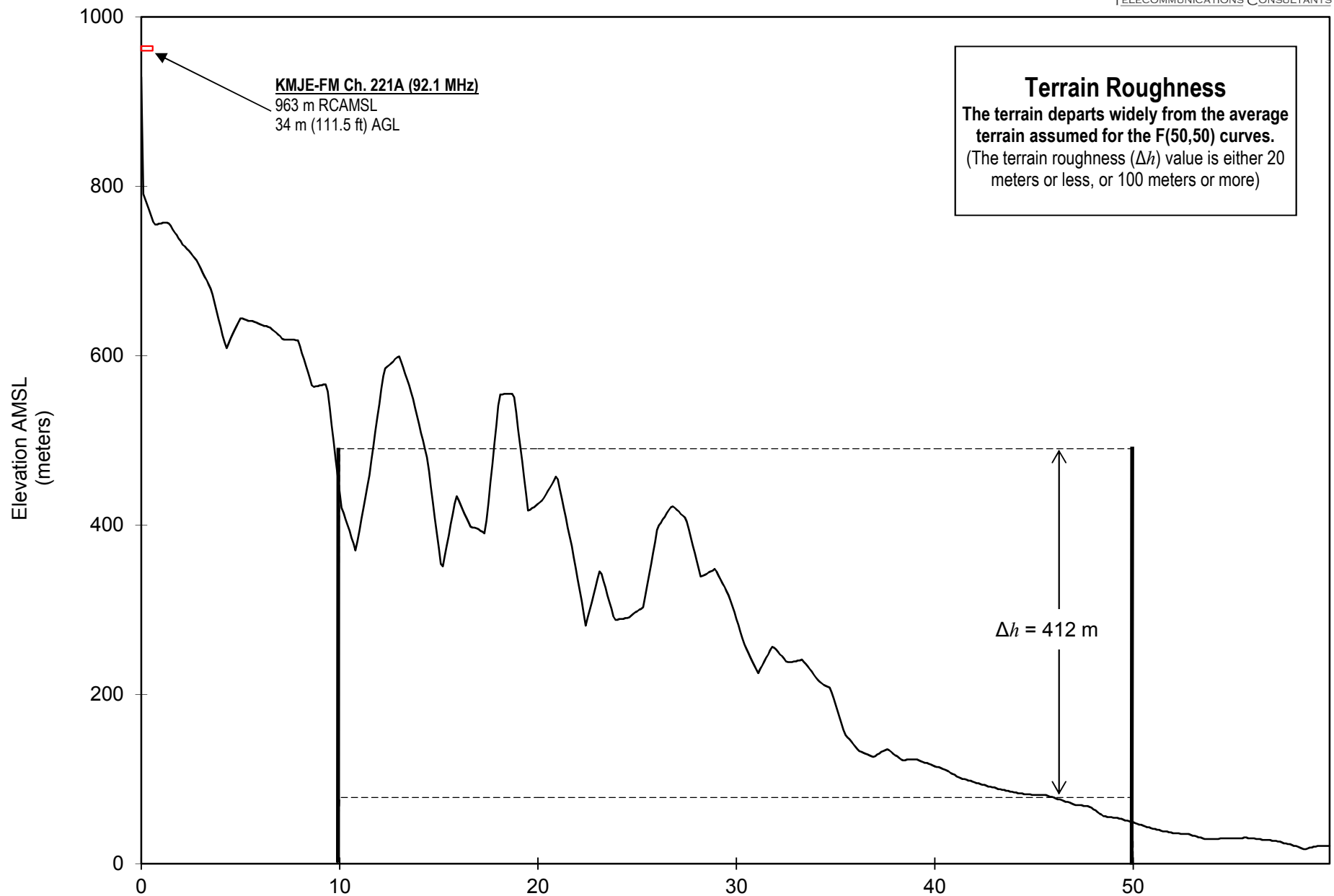


Location: 38-38-10.5 N, 120-38-14.0 W NAD27  
 Azimuth: 265.1°

Distance  
 (kilometers)

30-arc-second Digital Elevation Model  
 GLOBE Version 1.0

**FIGURE 3**

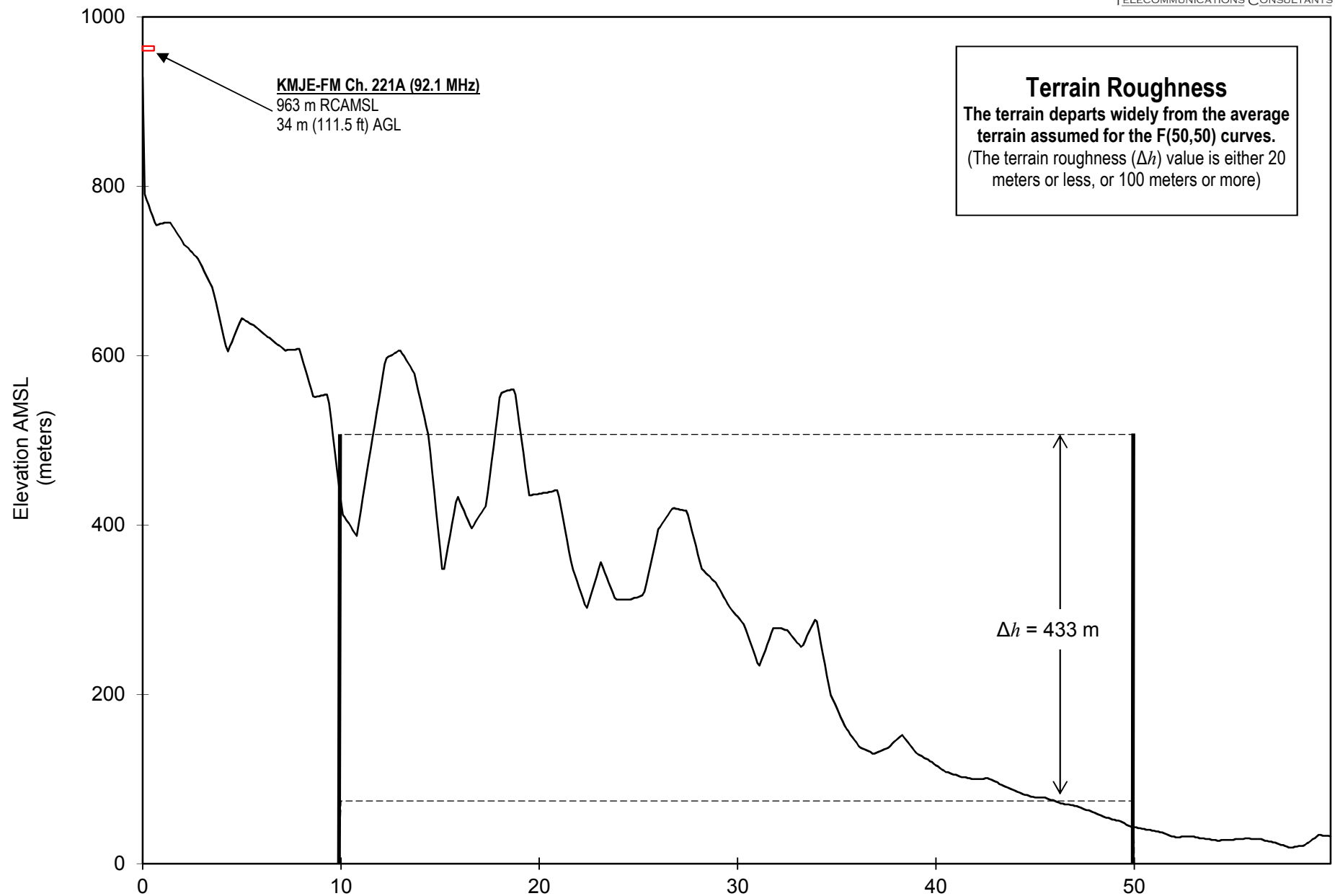


Location: 38-38-10.5 N, 120-38-14.0 W NAD27  
 Azimuth: 266.1° (Path to studio location)

Distance  
 (kilometers)

30-arc-second Digital Elevation Model  
 GLOBE Version 1.0

**FIGURE 4**

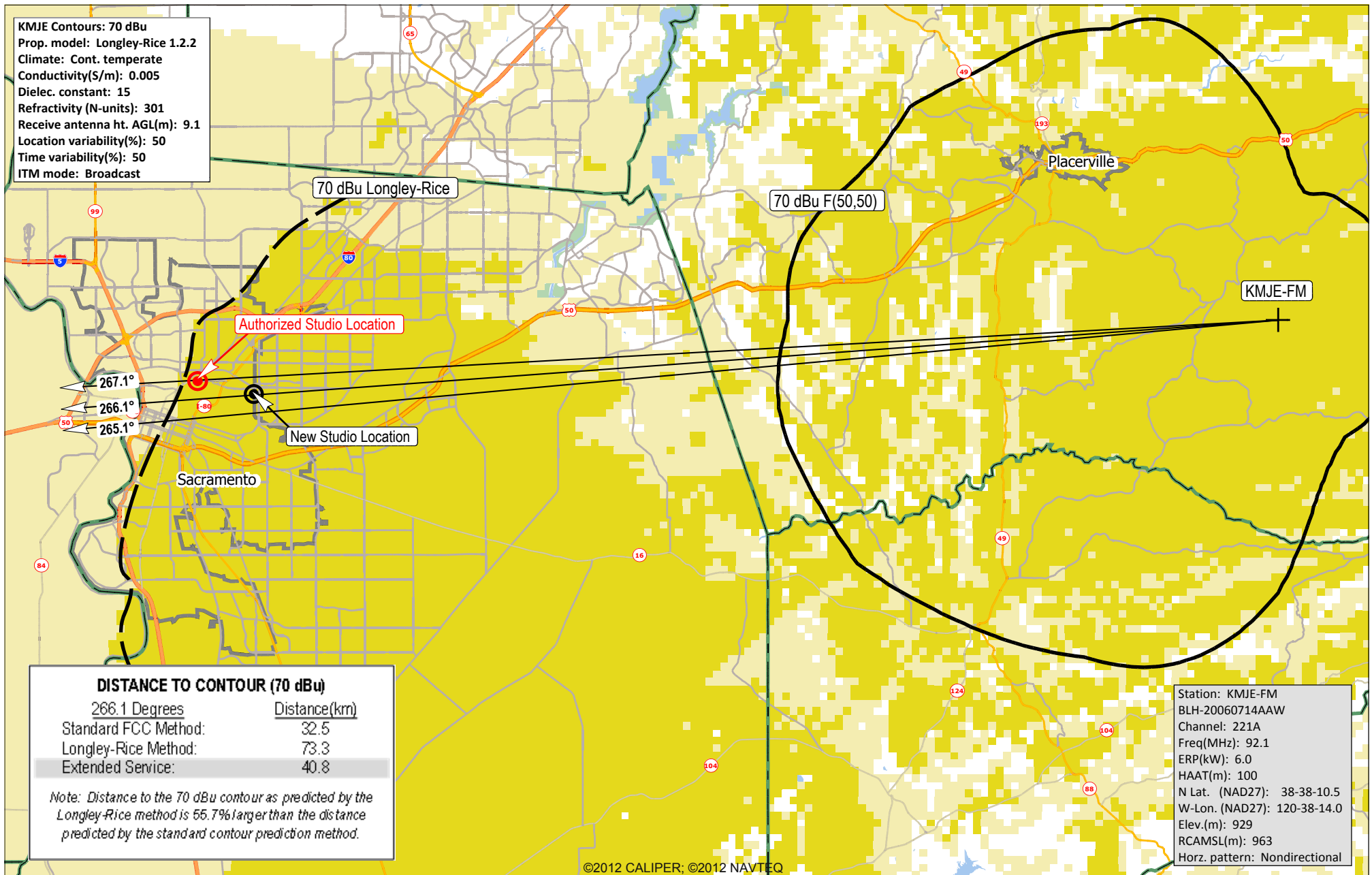


Location: 38-38-10.5 N, 120-38-14.0 W NAD27  
 Azimuth: 267.1°

Distance  
 (kilometers)

30-arc-second Digital Elevation Model  
 GLOBE Version 1.0

**FIGURE 5**



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**KMJE-FM SIGNAL STRENGTH DETERMINED**  
 Using Longley-Rice method pursuant to §73.313(e) & (f)

69 - 60 dBu      70 dBu & higher

Scale

2.5 0 2.5 5 7.5 10  
 Kilometers

**FIGURE 6**  
**PREDICTED CONTOUR (70 dBu)**  
**KMJE-FM 6.0 kW ERP 100 M HAAT**  
**PLACERVILLE, CALIFORNIA**

September 2014