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March 20, 2015

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



**Attention:** **Audio Division,**
**Media Bureau**

**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 2502 South Tyler Street, Second Floor Administration Office, 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**

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 2015

This technical statement has been prepared in support of a request for Determination of Compliance with the Main Studio Rule, 47 C.F.R. 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 2502 South Tyler Street, Second Floor Administration Office, Tacoma, Washington, which lies along the 338° True radial from the transmitter. Attached Figure 1 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 the Longley-Rice calculations are also shown on this map. The microcomputer program Probe 4 was used in all calculations.

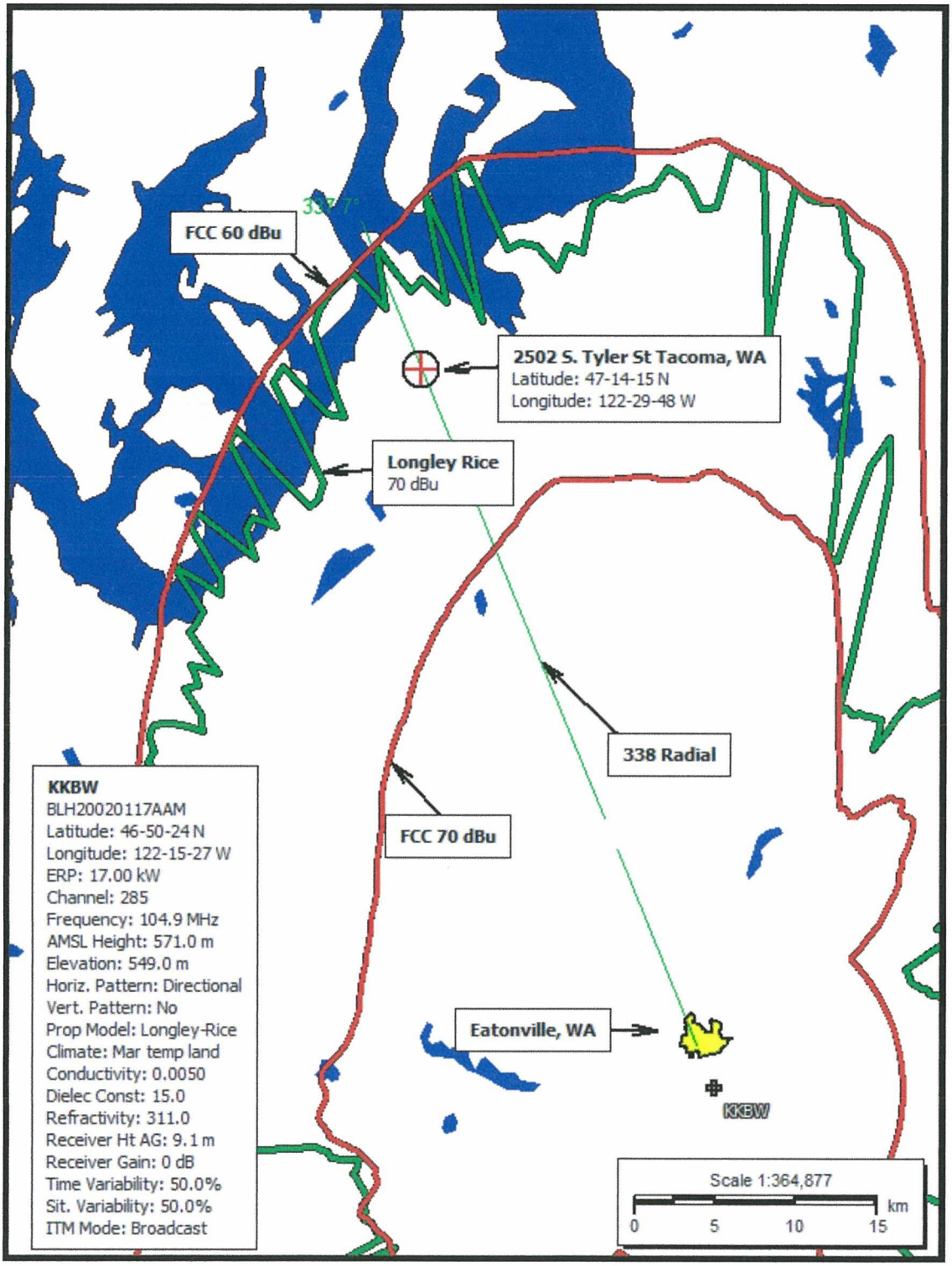
Troy G. Langham
FCC Engineering Supervisor
March 16, 2015

[1] FCC DA 10-1760.

## Figure 1.

| Azimuth (deg) | HAAT (m) | FCC 60 dBu | FCC 70 dBu | Longley Rice 70 dBu | Change % |
|---|---|---|---|---|---|
| 333 | 364.4 | 54.1 | 34.46 | 53.8 | 56.12% |
| 334 | 363.4 | 54.5 | 34.79 | 54.4 | 56.37% |
| 335 | 361.2 | 54.8 | 35.04 | 54.7 | 56.11% |
| 336 | 360.2 | 55.2 | 35.35 | 55 | 55.59% |
| 337 | 359.8 | 55.6 | 35.67 | 52.1 | 46.06% |
| **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% |
| **Average of Distance Difference** | | | | | **48.61%** |

## Figure 2


FCC 60 dBu
2502 S. Tyler St Tacoma, WA
Latitude: 47-14-15 N
Longitude: 122-29-48 W
Longley Rice
70 dBu
338 Radial
FCC 70 dBu
KKBW
BLH20020117AAM
Latitude: 46-50-24 N
Longitude: 122-15-27 W
ERP: 17.00 kW
Channel: 285
Frequency: 104.9 MHz
AMSL Height: 571.0 m
Elevation: 549.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: Longley-Rice
Climate: Mar temp land
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
Eatonville, WA
KKBW
Scale 1:364,877
km
0
5
10
15