

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET SW
WASHINGTON DC 20554

JUN 05 2015

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio

PROCESSING ENGINEER: Tung Bui
TELEPHONE: (202) 418-2722
FACSIMILE: (202) 418-1410
MAIL STOP: 1800B3
INTERNET ADDRESS: tung.bui@fcc.gov

S and H Broadcasting, LLC
P.O. Box 53248
Bellevue, WA 98015

In re: KQCM(FM), Twentynine Palms, CA
Facility ID No.: 2316
S and H Broadcasting, LLC
Request for confirmation of compliance with
47 C.F.R. § 73.1125

Dear Licensee:

This refers to your attorney letter requesting confirmation that the main studio location of KQCM, Twentynine Palms, California 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 KQCM's construction permit BPH-20120316ABT, as required by 47 C.F.R. § 73.1125. The main studio is located at 1321 North Gene Autry Trail in Palm Springs, CA (33° 50' 27" N.L., 116° 30' 23" W.L.).

The engineering study which KQCM 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 1321 North Gene Autry Trail location lies within the 70 dBu contour as defined using the Longley-Rice prediction methodology. Furthermore, the exhibit demonstrates that the distance to KQCM'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 87% along the azimuth from KQCM's transmitter location in the direction of the proposed main studio. 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 June 4, 2015 the OET confirmed that the main studio location is encompassed by the 70 dBu field strength contour of the facilities specified in KQCM's construction permit. Accordingly, we find that KQCM'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: Peter Gutmann, Esq. (via email)