

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Received & Inspected

MAR 08 2017

FCC Mailroom

In the Matter of)

SOUTHWEST HERITAGE)
FOUNDATION)

for New LPFM)
Station to Phoenix, Arizona)

) File No. BNPL-20131115AUU

) Fac. ID No. 197600

) KPCR-LP

To: Marlene H. Dortch, Secretary
Federal Communications Commission

Peter Doyle, Chief, Audio Division--Media Bureau

2017 MAR 13 A 10:33

PETITION FOR RECONSIDERATION

Southwest Heritage Foundation ("SWHF") was granted a construction permit for a new Low Power FM radio station February 5, 2014. The Foundation has since moved forward to be the city's only broadcast community radio station since no other community or college radio station exists within the city. Since that date SWHF has purchased equipment for a studio, constructed the studio, put up a website, garnered community support, developed a budget, and made every effort the station on-air by the construction permit deadline. When doing preliminary testing of signal strength and interference from full-power stations before completing construction, we discovered that our proposed signal was severely impacted by another facility—co-channel KKLD in Cottonwood, Arizona, which was not mentioned in the original application which had been prepared for us. We hired Hatfield and Dawson engineering consultants to for exploration of the issue of other suitable sites and other possible frequencies if we stayed at the original site in the application. A copy of the Hatfield Dawson report is attached.

Nonetheless, we continued with studio construction, expending some \$6,600 in equipment.

We still had about \$7,000 in the bank which would have allowed us to move forward with necessary city permits, leases, and so forth. We completed construction of the studio, with the intention of broadcasting through a local internet radio station to garner public interest in our programming and to begin to train personnel.

We eventually found a suitable tower site in central Phoenix which was, and still is, available for lease. We spoke with Hatfield Dawson several times, and they informed us that there might be a frequency available at 93.7 MHz that would meet our needs.

We were fully prepared to move forward at that time, but needed permission from the City of Phoenix to put a microwave transmitter on the roof of the City building we were housed in to send the signal to our transmitter a quarter mile away. Despite numerous letters, attempts at meeting, cancelled meetings, appeals to the Mayor, and interventions by our attorney, the City simply refused to meet to even discuss the issue of a microwave device.

Since that time, the internet station where our studio is located has installed an Icecast server system which would allow us to send a signal directly by cable to the tower site approved in our original application. We are fully prepared to move ahead using cable transmission systems to our original site or to an alternative site which will minimize interference from co-channel KKLD.

We were contacted within the last week by nonprofit Common Frequency asking why we did not file a "license to cover." When we logged into CDBS to determine the status of the construction permit, we found that the permit deadline had run and the permit canceled.

This Reconsideration is being filed within 30 days of the construction permit deadline to request reinstatement of the construction permit to allow completion of the transmitter and filing of form 319, license to cover. SWHF believes this is in the public interest because:

1. Phoenix is the seventh largest city in the United States, and there is no community radio station here;
2. The SWHF will build on 10 years of internet broadcasting experience to open its facilities to all members of the community, and especially those, such as Native Americans, who have traditionally been excluded from the urban airwaves;
3. The next LPFM filing window is possibly years away and no channels will be open for licensing another facility;
4. SWHF has already invested a considerable amount of funds building a broadcast facility and wants to complete its mission;
5. Newer technologies may allow SWHF to proceed without the need for city permits.

Southwest Heritage Foundation has attached documents in support of this request. Attached are receipts for equipment purchase, frequency studies, photographs, fundraising materials, and other matters to demonstrate our effort to create a community radio facility in Phoenix.

Thank you for your consideration of this Petition for Reconsideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Victor Aronow', with a long horizontal flourish extending to the right.

Victor Aronow
President, Southwest Heritage Foundation
Phoenix Center for the Arts
1202 North 3rd Street
Phoenix, AZ 85004

Attachments

Received & Inspected

MAR 08 2017

FCC Mailroom

KPCR-LP
Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
480-829-5746

June 16, 2014

Mayor Greg Stanton
City of Phoenix
200 West Washington
11th Floor
Phoenix, AZ 85003

RE: New Radio Station for Phoenix

Dear Mayor Stanton:

I would like to introduce you to KPCR-LP, a new low power FM radio station which will be going on the air this fall at 95.9 FM. As you can see from the enclosed coverage map, it will be broadcasting to the heart of downtown Phoenix, with a potential audience in excess of 325,000 residents. We anticipate going on the air in September or October of this year.

KPCR-LP is a community radio station owned and operated by the Southwest Heritage Foundation, a 501(c)(3) educational non-profit, and I would like to meet with you or representatives of your staff to discuss how the new station and the City of Phoenix can work together to educate the members of our broadcast area about City affairs and activities, and how we can work together to move the programs and interests of the city forward. I can be reached at **victoraronow@aol.com** or at 480-829-5746.

Thank you.

Sincerely,

Victor Aronow,
Project Coordinator

KPCR-LP (95.9 FM) is a community owned and operated FM radio service of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit corporation.

Received & Inspected

MAR 08 2017

FCC Mailroom

KPCR-LP
Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
480-829-5746
victor@kpcr.org

September 24, 2014

Ms. Rita Hamilton
City Librarian
Phoenix Public Library
1221 North Central Ave.
Phoenix, AZ 85004

RE: A new community radio station for Phoenix

Dear Ms. Hamilton:

I am writing on behalf of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit, to invite the Library to become an active participant in one of the most exciting educational opportunities to arise in Phoenix in many years. The Foundation has been granted a permit to construct an FM radio station which will cover all of central Phoenix, and we have just completed building a new broadcast studio at the Phoenix Center for the Arts. Our allied internet station, Radio Phoenix, has been carrying programs and announcements for the Library for some time and regularly carries announcements of Library events in its newsletter. Because of this relationship, we would invite the Library to become an active participant in this new opportunity to connect the Library and central Phoenix through radio.

The projected broadcast area for the station, KPCR-LP, will extend from Grant Street to Camelback Road and from 30th Street to 30th Avenue. There are about 300,000 residents in the broadcast area, not counting ASU, Phoenix College, and high school students, as well as the thousands of government workers and business people who travel to the city every day.

Our Board consists of representatives from major art and cultural venues, as well as ordinary citizens who see the value of community based and community controlled radio. I would like to meet with you and members of your staff at your earliest convenience to discuss how the Foundation and the Library can work together to develop our programs.

Thank you, and I look forward to hearing from you.

Sincerely,

Victor Aronow

Project Manager

Received & Inspected

MAR 08 2017

FCC Mailroom

KPCR-LP
Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
480-829-5746
www.kpcr.org
victor@kpcr.org

October 20, 2014

Mr. Jim Burke, Director
Parks and Recreation Department
City of Phoenix
200 West Washington
16th Floor
Phoenix, AZ 85003

RE: New Community Radio for Central Phoenix

Dear Mr. Burke:

I am writing on behalf of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit here in Phoenix, to request a meeting with you and your staff concerning a new and exciting opportunity for the City of Phoenix and its residents to engage in civic and cultural development, expansion, and integration through a new low power FM radio station that has been licensed to the Foundation.

The new station, KPCR, has its studios in the Phoenix Center for the Arts, in space shared with Radio Phoenix, Arizona's largest and all volunteer internet radio station. Radio Phoenix has been bringing the voice of Phoenix to the city, the state, the country and the world for six years, and has successfully trained hundreds of local residents in radio station operations from its studio at the Center. The new FM radio station wants to continue this tradition, but in the other direction, by becoming the voice of the village in the heart of the City. As a low power FM station, KPCR will provide complete radio service to a core community extending from south of the Rio Salado to Camelback, and from 35th Street to 35th Avenue. There are approximately 350,000 residents in the primary broadcast area, not including government employees, downtown workers, ASU students, and others who commute to the central city every day, and KPCR will bring them local news, views, and music that the larger stations cannot afford to provide.

The Board of the Foundation consists of representatives from major cultural institutions, the Hispanic press, musician's organizations, and ordinary citizens who see the value in a broadcast service that is focused in area and local in content. Among the programs which the Board is actively considering are "Police Beat," "Phoenix Features," "Morning Coffee," "City Hall,"

“Senior Moments,” and “Culture Corner.” A more specific description of these and other programs under discussion is attached. Of course, we want include the Parks and Recreation Department in our programming schedule, as is currently being done on Radio Phoenix.

However, we have encountered a problem with our plans for broadcasting, and we are seeking the assistance of your Department in resolving a matter which has arisen concerning the placement of our broadcast tower. Our original application grant from the FCC licensed us to a location on Camelback, but we have encountered an issue with an interfering broadcaster from Cottonwood, and our engineers have advised us that a much better location would be in the Hance Park area. As I mentioned, our studio is located in the Phoenix Center for the Arts, and there is ample room between the North and South buildings to place a small tower and an antenna between them. The tower is not like the one on the Westward-Ho or for the usual full power broadcast station. Our tower is only twenty-four inches on a side, would take up only ten square feet on the ground, and would extend somewhat above the present roofline of the building, depending on the FCC height requirement at that point. The installation of the tower and antenna would, of course, be paid entirely by the Foundation.

Phoenix has never had its own local radio station before, and the Foundation is enthusiastic about creating a new cultural, educational, and civic opportunity for City government, your Department, the many museums within our broadcast area, and the residents and workers in our broadcast village in the heart of the City.

I look forward to an opportunity to meet discuss our project and how the Foundation and the City can collaborate to make Phoenix a better place to visit, work, and live. Please feel free to have your staff contact me about arranging a meeting either by phone or at my e-mail address.

Thank you.

Sincerely,

Victor Aronow
Project Manager

KPCR-LP is a community owned and operated FM radio service of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit corporation.

Subject: Re: New Radio Station for
Phoenix

From: shannon.montilla@phoenix.gov (Add as Preferred Sender)

Date: Thu, Oct 09, 2014 8:46 am

To: <victor@kpcr.org>

Cc: mike.schaffert@phoenix.gov

Victor,

I have forwarded your request to the Library for consideration, once I hear back from them I will let you know.

Thank you for your patience and if you should have questions, please advise.

Shannon Montilla
Property Specialist
City of Phoenix | Real Estate Division

Direct: 602-262-6027 | shannon.montilla@phoenix.gov

Subject: Fw: Follow-up to Phone Call

From: jami.spear@phoenix.gov (Add as Preferred Sender)

Date: Tue, Nov 04, 2014 3:33 pm

To: victor@kpcr.org

Cc: shannon.montilla@phoenix.gov

Hi Victor,

Shannon has forwarded your inquiry to the appropriate contacts in each Department and someone will be in touch once the information has been reviewed. It is my understanding that the Library will not approve the Burton Barr location.

Please keep in mind that ultimately the decision will be based on the Department who controls the property, and Shannon can only pass along the information and prepare a license, if approved.

Thank you,
Jami Spear
Real Estate Supervisor
City of Phoenix Real Estate

602-534-9703

Subject: Follow-up on KPCR Tower Site
From: <victor@kpcr.org>(Add as Preferred Sender)
Date: Mon, Dec 08, 2014 3:20 pm
To: shannon.montilla@phoenix.gov

Hello Shannon:

I hope that you had a good Thanksgiving and that the holiday season is not making you crazy.

I am doing some follow-up work on the previous letters and conversations we have had about a possible tower site for the new low power FM station KPCR in the Hance Park area. I understand from Jami Spear that you sent our original letter to the various departments that might be involved. I want to discuss our interests with the departments involved, so I would like to know to whom you sent the letters and the departments that are involved.

You told me in our phone call of October 21 that the land the Phoenix Center for the Arts (PCA) is located on is owned by the Arizona Department of Transportation. This is apparently new information to the PCA Board. Could you let me know where this information came from so I can track it down? We are especially interested in placing our tower at the PCA facility since that is where our studio is located.

I also inquired about the use of the fenced area outside the abandoned fire station that is between the library and the old KPNX studio. Is that fire station still owned or operated by the fire department, and if it is not, can you tell me who owns or has supervision over the property.

Thank you for your assistance.

Victor Aronow

Dear Mr. Naimark:

(by e-mail)

11/25/15

Thank you for taking the time to stop by the Radio Phoenix/KPCR-FM broadcast and training studios at the Phoenix Center for the Arts during the Mayor's Art Award celebration.

As I mentioned at the time, we would like to meet with you next week to discuss our efforts to put a low power FM station on the air in central Phoenix. The station, KPCR-FM, would be operated by the Southwest Heritage Foundation, an educational 501(c)(3) non-profit. We are offering the city of Phoenix and its residents something that they have never had before – a locally controlled and locally oriented community radio station that would focus on the 200,000 residents of the central Phoenix area, in addition to the government employees, business people, and students that come into the area every day. I've attached an information sheet about some of the programming that the KPCR board is discussing. As you may know, recently the Republic ran a pretty bleak report called "Does Phoenix Have a Soul?" We at KPCR believe that Phoenix does have a soul, and as the voice of the village in the heart of the city, we want to make that soul stronger. A station such as ours, with its emphasis on local activities, local events and culture, and the local community, could serve as an inexpensive yet effective advertising resource for the many small business that are springing up as the central core develops.

Our proposed broadcast area extends from Camelback to the Rio Salado, and from 40th Street to 40th Avenue. Our engineers have told us that the best location for our tower would be in the Hance Park area, and we have been trying to gain approval from either the Parks and Recreation Department or whatever agency controls the sites we are interested in, although ultimate responsibility is sometimes not very clear.

The tower we want to build is very small; not at all like the traditional radio tower such as the one on the Westward –Ho. The tower could be made self-supporting, with a base just 20 inches on a side anchored in a concrete block. There are a number of sites around Hance Park which would be completely satisfactory, including the Phoenix Center for the Arts itself, or the fenced area of the abandoned fire station just south of the library.

Thank you for stopping by, and we look forward to the opportunity to meet with you.

KPCR-LP
Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
480-829-5746
www.kpcr.org
victor@kpcr.org

December 9, 2014

Ms. Esther Avila
Parks and Recreation Department
City of Phoenix
200 West Washington
16th Floor
Phoenix, AZ 85003

RE: New Community Radio for Central Phoenix

Dear Ms. Avila:

I am writing at the suggestion of Mr. Burke's office to request a meeting with you and your staff concerning a unique and exciting opportunity for the City of Phoenix and its residents to engage in civic and cultural development and community integration through a new low power FM radio station that has been licensed to broadcast in Central Phoenix.

The new station, KPCR, has its studios in the Phoenix Center for the Arts, in space shared with Radio Phoenix, Arizona's largest and all volunteer internet radio station. The new station, a project of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit, wants to become the voice of the village in the heart of the City. As a low power FM station, KPCR will provide complete radio service to a core community extending from south of the Rio Salado to Camelback, and from 35th Street to 35th Avenue. There are approximately 200,000 residents in the primary broadcast area, not including government employees, downtown workers, ASU students, and others who commute to the central city every day, and KPCR will bring them local news, views, and music that the larger stations cannot afford to provide.

The Board of the sponsoring Foundation consists of representatives from major cultural institutions, the Hispanic press, musician's organizations, and ordinary citizens who see the value in a broadcast service that is focused in area and local in content. Among the programs which the Board is actively considering are "Police Beat," "Phoenix Features," "Morning Coffee," "City Hall," "Senior Moments," and "Culture Corner." A more specific description of these and other programs under discussion is attached. Of course, we want include the Parks and Recreation Department in our programming schedule.

However, we have encountered a problem with our plans for broadcasting, and we are seeking the assistance of your Department in resolving a matter which has arisen concerning the placement of our broadcast tower. Our original application grant from the FCC licensed us to a location on Camelback, but we have encountered an issue with an interfering broadcaster from Cottonwood, and our engineers have advised us that a much better location would be in the Hance Park area. As I mentioned, our studio is located in the Phoenix Center for the Arts, and there is ample room between the North and South buildings to place a small tower and an antenna between them. The tower is not like the one on the Westward-Ho or for the usual full power broadcast station. Our tower is only twenty-four inches on a side, would take up only ten square feet on the ground, and would extend slightly above the present roofline of the building, depending on the FCC height requirement at that point. The installation of the tower and antenna would, of course, be paid entirely by the Foundation.

Phoenix has never had its own local radio station before, and the Foundation is enthusiastic about creating a new cultural, educational, and civic opportunity for City government, your Department, the many museums within our broadcast area, and the residents and workers in our broadcast village in the heart of the City.

I look forward to an opportunity to meet discuss our project and how the Foundation and the City can collaborate to make Phoenix a better place to visit, work, and live. Please feel free to have your staff contact me about arranging a meeting either by phone or at my e-mail address.

Thank you.

Sincerely,

Victor Aronow
Project Manager

KPCR-LP is a community owned and operated FM radio service of the Southwest Heritage Foundation, a 501(c)(3) educational non-profit corporation.

broadcast gear from people you trust



BROADCAST SUPPLY WORLDWIDE

2237 So. 19th, Tacoma, WA 98405

P:800-426-8434 F:800-231-7055

Quote

Quote No: QT.STD00356713

Customer No: KPCR-001

Sold To:

KCPR-LPFM
 PO BOX 618
 C/O SOUTHWEST HERITAGE FOUND.
 PHOENIX, AZ 85001-0618
 USA

Attn: VICTOR ARONOW
 Phone:(480)829-5746

Ship To:

KCPR-LPFM
 2505 SOUTH TERRACE
 TEMPE, AZ 85282
 USA

Attn: VICTOR ARONOW
 Phone:(480)829-5746

Date	Salesperson	Customer PO	Shipping Method	Payment Terms	Reference	
04/29/2014	BOB R		FEDEX-GROUND	Credit Card	754,751	
Qty	Brand	Item Number	Description	List Price	Your Price	Ext. Price
1	AUDIOARTS	AIR4	12 Channel Broadcast Console	\$3,995.00	\$3,450.23	\$3,450.23
4	SHURE	SM7B-PKG	Shure SM7B with Mic Boom & 10 ft Cable	\$610.00	\$399.00	\$1,596.00
1	OCWHITE	14111B	*TMA Triple Riser Only, Black	\$84.00	\$80.00	\$80.00
1	OCWHITE	11427B	Table Mount Base for OC White Booms, Black	\$0.00	\$33.10	\$33.10
1	ROLLS	HA43PRO	4 Channel Headphone Amplifier	\$70.00	\$47.30	\$47.30
2	SENNHEISER	HD202-PKG	5-Pack of HD202 Closed Ear Headphones	\$149.75	\$89.00	\$178.00
1	MIDDLE	EB1	1-Space Blank Rack Panel	\$9.51	\$6.47	\$6.47
1	MIDDLE	RK8	14" 8-Space Equipment Rack	\$166.86	\$108.29	\$108.29
1	MIDDLE	HW100	100 Screws / Washers	\$35.80	\$20.97	\$20.97
1	STANTON	C502	Dual CD/MP3 Player W/Anti-Shock	\$499.00	\$246.84	\$246.84
1	DBX	166XS	Dual Compressor Limiter Gate	\$339.95	\$206.72	\$206.72
1	ROLLS	RA235	Power Amplifier 35 Watts/Channel	\$240.00	\$192.31	\$192.31
3	CORNELL	L101	On Air Light, White Lens, Black Letters 1 lamp, 1-gang (L-101-BOA)	\$42.00	\$34.19	\$102.57
2	NEUTRIK	NC3MXXPK	Package of 10 - XLR Male Connector, Nickel Shell	\$49.70	\$30.83	\$61.66
2	NEUTRIK	NC3FXXPK	Package of 10 - XLR Female Connector, Nickel Shell	\$55.30	\$31.27	\$62.54
2	SWITCHCRAF	3502PK	Package of 10- RCA Plug. Cable MT	\$15.74	\$14.95	\$29.90
1	SWITCHCRAF	297PK	Pack of 10 - 1/4" TRS Plug	\$44.41	\$42.18	\$42.18

broadcast gear from people you trust



BROADCAST SUPPLY WORLDWIDE

2237 So. 19th, Tacoma, WA 98405

P:800-426-8434 F:800-231-7055

Quote

Quote No: QT.STD00356713

Customer No: KPCR-001

Sold To:

KCPR-LPFM
PO BOX 618
C/O SOUTHWEST HERITAGE FOUND.
PHOENIX, AZ 85001-0618
USA

Attn: VICTOR ARONOW
Phone:(480)829-5746

Ship To:

KCPR-LPFM
2505 SOUTH TERRACE
TEMPE, AZ 85282
USA

Attn: VICTOR ARONOW
Phone:(480)829-5746

Date	Salesperson	Customer PO	Shipping Method	Payment Terms	Reference	
04/29/2014	BOB R		FEDEX-GROUND	Credit Card	754,751	
Qty	Brand	Item Number	Description	List Price	Your Price	Ext. Price

Thank you for giving us an opportunity to serve you. We are grateful for your business.

This quote is valid for 30 days from the above date. In the event of a manufacturer price increase our selling price may be adjusted with a similar discount applied. Prices are based on payment terms stated above. Any changes in these terms may result in a price adjustment. Open account terms are Net 30 days unless otherwise indicated and are subject to BSW credit approval. Invoicing for partial shipments will be allowed. Freight charges are an estimate. Additional freight and/or drop-shipment fees may apply to this order. All products are 110 VAC unless otherwise specified. Suitability of products for intended use is the sole responsibility of the customer. Custom, special order and non-inventoried products such as consoles, furniture, antennas, transmitters, wire, transmission line and cable are not returnable. Normal BSW stock items may be returned within 30 days of receipt. Restock fees and repair charges will be assessed should products not be in new condition and include all accessories, manuals and packing materials. Please contact our Customer Care department for helpful return information. All factory warranties apply. Service and repair must be completed at designated factory repair centers. BSW will not be responsible for delays or errors caused by carriers, manufacturers, or others in the course of doing business. All purchased items remain the property of BSW until paid for in full. Unpaid items will accrue interest. Purchaser agrees to pay all legal expenses associated with collection of monies owed. All payments on approved Net 30 accounts must be by Check, EFT or Wire Transfer.

The above quote with all conditions is accepted by:

Subtotal	\$6,465.08
Freight	\$139.19
Tax	\$0.00
Total	\$6,604.27

Print Name

Signature

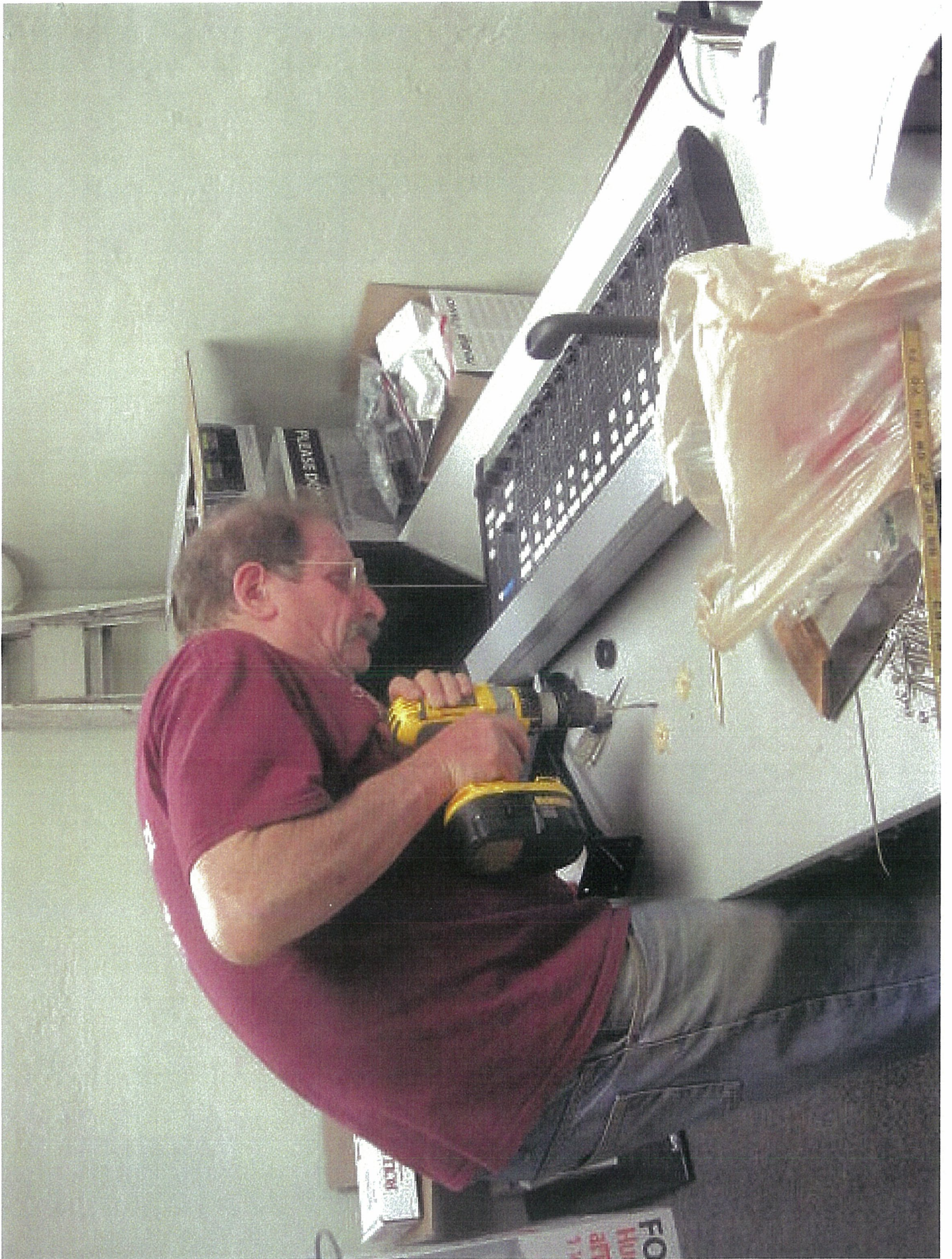
Date

PO Number (optional)

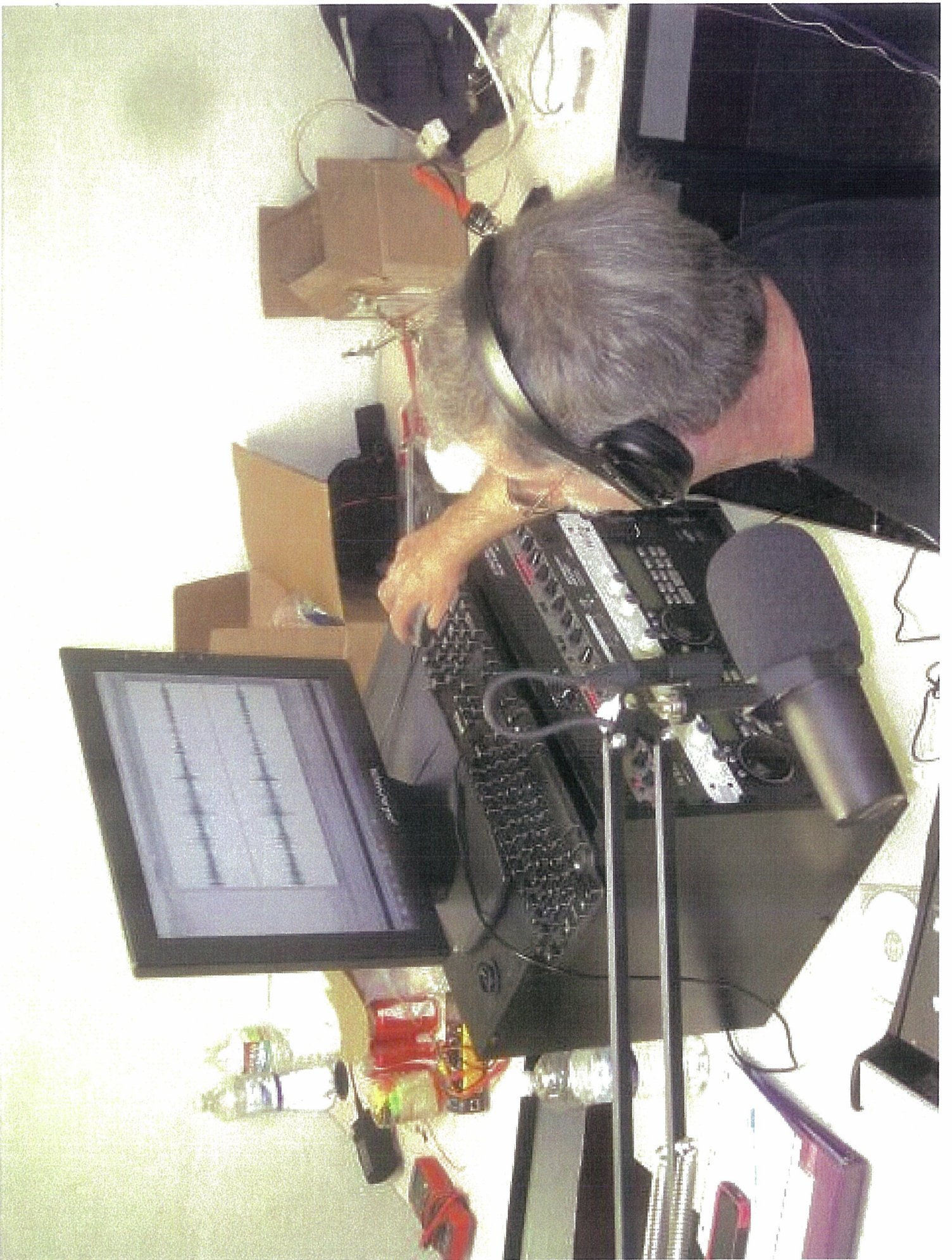
02/13













HATFIELD & DAWSON

BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE
DAVID J. PINION, PE
ERIK C. SWANSON, PE

THOMAS S. GORTON, PE
MICHAEL H. MEHIGAN, PE

CONSULTING ELECTRICAL ENGINEERS
9500 GREENWOOD AVE. N.
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151
FACSIMILE (206) 789-9834
E-MAIL hatdaw@hatdaw.com

JAMES B. HATFIELD, PE
CONSULTANT

MAURY L. HATFIELD, PE
(1942-2009)
PAUL W. LEONARD, PE
(1925-2011)

August 28, 2014

Victor Aronow
Project Manager
KPCR-LP
Southwest Heritage Foundation
PO Box 618
Phoenix, AZ 85001-0618

via email victoraronow@aol.com

Dear Victor,

Per your request and having received the advance, I have been reviewing the site and channel (frequency) options for KPCR-LP Phoenix. You have described that the rental cost at the construction permit site is high, and that there is concern about interference which would be caused by the cochannel operation of KKLD out of Cottonwood. Your letter listed four alternative sites, asking whether any of them were feasible, and which would give the best coverage with the least possibility of a full-power station causing significant interference.

At each of the four sites, I ran spacing studies to determine what LPFM channels might be available. All four of the candidate sites are located within a 5.6 kilometer radius of the authorized KPCR-LP transmitter site, and so would qualify as minor change applications. Furthermore, we can propose a change of frequency provided that we can couch the request in terms of a reduction in interference. The table on the following page lists the four sites and the frequencies found to be available for LPFM at each.

Clarendon Hotel		401 West Clarendon
Available LPFM Channels		
220L1 (91.9 MHz)	Cochannel with KVJC 220C2 Globe, which places about 60 dBu into the LPFM service area. This is higher than what KKLD is predicted to put into the LPFM service area.	
240L1 (95.9 MHz)	This is the current KPCR-LP channel.	
241L1 (96.1 MHz)	Cochannel with KLPX 241C Tucson. This doesn't seem to be a big deal, and KLPX is likely not concerned with its own reception in Phoenix. Also cochannel with K241BQ Ft McDowell, which is predicted to place about 60 dBu into the LPFM service area.	

Phoenix Center for the Arts		1202 N 3rd Street
Available LPFM Channels		
220L1 (91.9 MHz)	Cochannel with KVJC 220C2 Globe, which places about 60 dBu into the LPFM service area. This is higher than what KKLD is predicted to put into the LPFM service area.	
229L1 (93.7 MHz)	Cochannel with KRQQ 229C Tucson. Some signal sneaks into Phoenix area, but not very high, and KRQQ is likely not concerned with its own reception in Phoenix.	
231L1 (94.1 MHz)	Cochannel with KRDE 231C1 San Carlos, which places about 70 dBu into the LPFM service area.	
240L1 (95.9 MHz)	This is the current KPCR-LP channel.	
241L1 (96.1 MHz)	Cochannel with KLPX 241C Tucson. This doesn't seem to be a big deal, and KLPX is likely not concerned with its own reception in Phoenix. Also cochannel with K241BQ Ft McDowell, which is predicted to place about 60 dBu into the LPFM service area.	

Courtesy Chevrolet		1233 E Camelback
Available LPFM Channels		
240L1 (95.9 MHz)	This is the current KPCR-LP channel.	
241L1 (96.1 MHz)	Cochannel with KLPX 241C Tucson. This doesn't seem to be a big deal, and KLPX is likely not concerned with its own reception in Phoenix. Also cochannel with K241BQ Ft McDowell, which is predicted to place about 60 dBu into the LPFM service area.	

Office Building		609 E Oregon
220L1 (91.9 MHz)	Cochannel with KVJC 220C2 Globe, which places about 60 dBu into the LPFM service area. This is higher than what KKLD is predicted to put into the LPFM service area.	
240L1 (95.9 MHz)	This is the current KPCR-LP channel.	
241L1 (96.1 MHz)	Cochannel with KLPX 241C Tucson. This doesn't seem to be a big deal, and KLPX is likely not concerned with its own reception in Phoenix. Also cochannel with K241BQ Ft McDowell, which is predicted to place about 60 dBu into the LPFM service area.	

In broad terms, the current channel and the next one up (96.1 MHz, which you mentioned in your letter) are both available for use at all four sites. But I'm not enthusiastic about either of those channels, nor about Ch 220 or Ch 231. I note that you characterize 96.1 MHz as only occupied by "small stations that never make it to Phoenix", but my propagation studies indicate that the Ft McDowell translator operates from a high site which puts about 60 dBu into the LPFM service area, which gives me concern about using that channel.

What I find to be the better channel – of those which can be used at any of these particular sites – is 229L1 (93.7 MHz) which only fits at one of the candidate sites, that being the Phoenix Center for the Arts.

The second-adjacent channel station to 229L1 is KDKB, which places a 98.3 dBu signal at the PCA building. The corresponding interfering contour from the LPFM station would be the 138.3 dBu contour, which would extend at most 8.5 meters from the antenna. The extent of this contour could be further "controlled" by incorporating the planned antenna's vertical plane radiation pattern into the calculation in order to ensure that the contour does not overlap ground level or occupied areas of the building. So a second-adjacent channel waiver shouldn't be a problem.

Of course, the higher the antenna the better the service. If I could choose, I would have the antenna placed on a 100 foot tower, but I suspect that isn't in the cards. I would recommend at least a 20 foot clearance above the roof.

The PCA site is 5.4 kilometers south of the current site (nearly at the limit for a minor change application), and so this would definitely help to extend the station's signal into the central Phoenix area that you indicated was of interest. Although I have to caution again that the lower the height of the antenna, the smaller the service area. (Note that the FCC contour calculation method generates a minimum contour distance of 5.6 km for any station operating with 100 watts, whether the antenna is sitting at ground level or up to 100 feet. So that contour method doesn't really communicate the difference in coverage for a nominal change in height.)

One other point which I should mention regarding installation on a building such as the PCA is that if the building is either a) on the National Register for Historic Places, or b) at least 45 years old, then the applicant must coordinate the antenna (and support structure) proposal with the State Historic Preservation Office as part of a Section 106 analysis. This is a non-engineering matter requiring the engagement of an environmental/historical consultant, to determine whether the installation will have an adverse effect upon historical properties. This process – if needed – would need to be completed before the FCC would issue a construction permit, but could proceed in parallel with the CP application.

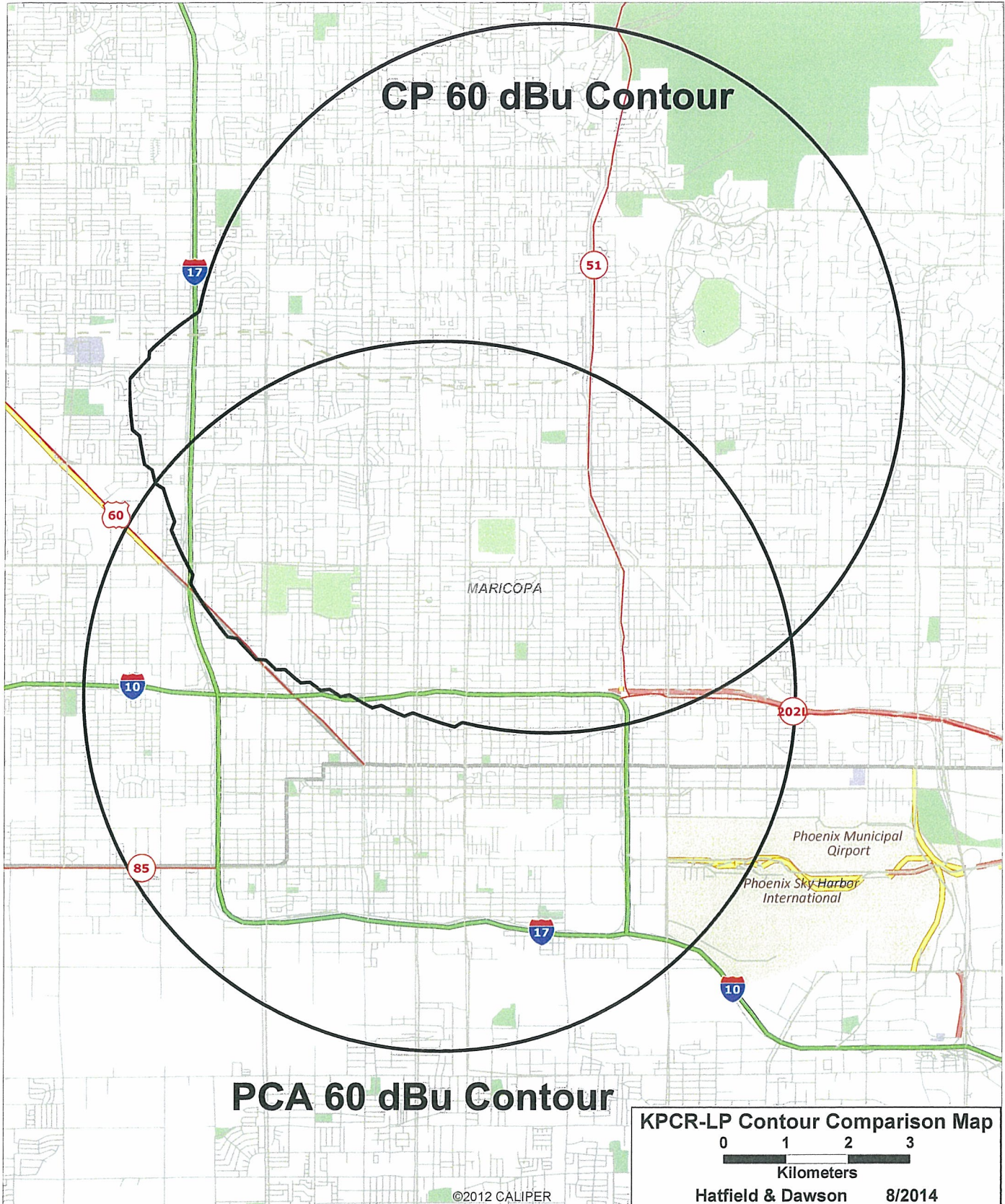
The PCA building does not appear to be on the National Register, but you would need to research the age of the building. Its appearance suggests to me that it may be over 45 years old. Installation of a freestanding tower would also trigger the need for a Section 106 analysis.

Thank you for asking Hatfield & Dawson to perform this study. Please let me know what additional questions you might have, or if you want to proceed with further studies or an application.

Regards,

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Erik C. Swanson
Consulting Engineer



From: Victor

Proposed list of things we need to do to construct the tower

"Punch List 1"

March 26, 2015

First, send Marina general description of the project along with some technical information about the size of the transmitter and a summary description of what the project might entail from a construction point of view;

Estimated cost: None

Second, along with this, send an MOU that simply states that they agree to rent facilities to us for \$750 a month sufficient and adequate to put the described radio transmission system on and in their building, pending approval of the location and frequency by the FCC, final terms and lease to be negotiated after receiving FCC approval;

Estimated cost: None

Third, upon receipt of the MOU from Marina, submit a request for the necessary engineering study and documentation from Hatfield and Dawson;

Estimated cost: \$1000

Fourth, complete and file application for a minor modification to the FCC;

Estimated cost: \$1000

Fifth, once the MOU is approved, begin contacting contractors and engineers for estimates and approvals for the job;

Estimated cost: None

Sixth, if necessary, once the MOU is approved, file any zoning or other building permit documents that might be necessary

Estimated cost: Not known at present

Seventh, meet with city officials and administrators to find out if neighborhood improvement or other grants are available to underwrite costs of the transmission system (about \$6,000 for STL boxes), per the letter we received earlier.

Eighth, once FCC approval is obtained, begin publicity campaign and intensive fundraising from lenders and local foundations.

Ninth, starting with the next meeting, begin working on a business plan that will be ready to present at step eight.

Ideas, suggestions?

Marina Hammersmith
Papago Medical Park
1331 North 7th Street
Phoenix, AZ 85006
Hand-delivered

April 2, 2015

Hi Marina:

The Board of the Southwest Heritage Foundation, which is the governing non-profit for KPCR-LPFM, is interested in pursuing further negotiations concerning the use of the Papago Medical Park building roof at 7th and Willetta for our low-power FM tower.

We would like to review a draft lease for roof space tailored to our particular use in order to determine if it would be feasible to move forward with your offer of \$750 per month for rent.

Some of the initial items which the Board would like to review and discuss in a draft lease include:

1. Insurance requirements
2. Roof access during non-business hours
3. Interior building access during non-business hours (presuming there would be access while the building is open to the public)
4. Any particular engineering requirements
5. Wear and tear conditions
6. Utility costs, if any
7. Auxiliary or emergency power supplies
8. Any other standard terms and conditions that the building owners may wish to include.

In order to provide a basis for the lease, here are some of the specifics of our proposal:

1. We would utilize the existing abandoned pipe attached to the machinery and air conditioning building wall as a sleeve for our monopole tower by inserting a metal pipe of smaller diameter inside the existing one;
2. There may be some additional anchors from our pole to the machinery building to give greater stability;
3. The base of our pole would be attached to and rest on a flat piece of iron approximately 24 inches square to provide further stability;
4. The monopole would be about four inches in diameter, depending on the actual inside diameter of the sleeve, and would resemble a flagpole;
5. The monopole would extend 20 to 30 feet above the roof of the machinery building, depending on the final requirements of the FCC

The antennas which would be attached directly to the monopole weigh about 20 pounds each. We would need two antenna for a total weight of about 40 pounds. Depending on style, the antennas are about 36 to 48 inches long. Final antenna selection depends on recommendations from a structural engineer that we would retain as well as any FCC requirements.

When we looked at the site, I noticed that the conduit and wiring for the abandoned structure appears to be intact and in place. If this wiring ends in a location which has rack space available, the signal could be carried from the transmitter in the building to the antennas using the existing conduit and wiring. We will have to find out where this cable goes and whether the prior lessee left their equipment or if there is rack space available.

The transmitter we will be using will probably be the Nautel VS300, which is specifically designed for low-power FM stations. It mounts on a standard 19 inch equipment rack and is two rack units (about 3.5 inches) high. It operates at 120 volts AC and draws 4 amps of current to produce 484 watts of output. At this amperage, it should be able operate on any standard 15 or 20 amp line in the building without further modification and with no noticeable increase in building electrical usage. In addition, we will need to install three additional pieces of equipment. One is a surge protector to protect the power line and other equipment. The surge protector will not take any additional power. The second piece of equipment is a codec, which prepares the incoming internet signal for the transmitter. The codec we will probably use draws less than .25 amps or about 14 watts, a negligible energy use. The third piece of equipment is the EAS encoder, which is used for emergency messages and public alerts. It is only used when activated by a signal from a central broadcasting station. In all, we will need five rack units, but not all necessarily in the same rack.

Basically, that's about all there is to the installation. The cabling is pretty straight forward and the entire installation, once the monopole is in place, should be completed in two weeks.

Thanks for your interest and assistance, and we look forward to hearing from you at your earliest convenience.

Victor

Arizona Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
(480) 829-5746
www.azswhf.org

Projected Budget 2016

Note: This projected capital budget is based on estimate guidelines for the former PTFP federal grant which provided equipment funding for new stations. This grant program is no longer available. Equipment purchases have also been analyzed and confirmed by Jim Stanley, a Phoenix based RF engineer.

Note: The studio has already been constructed and is in use by Radio Phoenix.

Capital Expenses for Transmitter Construction

Fixed Capital Costs, Transmitter Construction	
Nautel VS300 LP Transmitter with Orban Internal Processing Card	6,500
Insulated transmitter enclosure with AC unit included	4,000
Shively Antenna	2,000
3" OD Steel Pole, 20 Feet, ¼"	TBD
Commscope cable (connecting transmitter to antenna)	350
Avalan Ethernet BridgeLink	2,000
Comrex Codec	1,500
EMR Cavity By Pass Filter	1,100
Cisco Ethernet Switch	300
Digital Alert EAS for LPFM	2,500
Rigid Electrical Conduit 1/2 " (for PCA building and Medical building)	800
EKM LED electric sub meter	100
Bases for microdish (non-penetrating; Commscope)	600
Estimated Materiel Cost	21,750
Estimated shipping costs	1,000
	22,750
Professional Services	
Liability/Construction Insurance	1,500
RF engineer	9,000
Commercial Electrician	4,000
Tower Erecting Company	6,000
Estimated Professional Cost	20,500
Total Estimated Cost	43,250

Arizona Southwest Heritage Foundation
P.O. Box 618
Phoenix, AZ 85001-0618
(480) 829-5746
www.azswhf.org

Projected First Year Operating Budget

Note: These budgets are based upon the previous two years of operation of Radio Phoenix, an internet radio station located in the same studios as KPCR-FM

Projected Revenue Sources

Underwriting	12,000
LMA program payment	9,000
General contributions	3,600
Membership	3,500
Board member cash contributions	1,200
Fundraiser and other events	1,200
Merchandise sales	2,000
Total Estimated Revenue	32,500

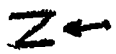
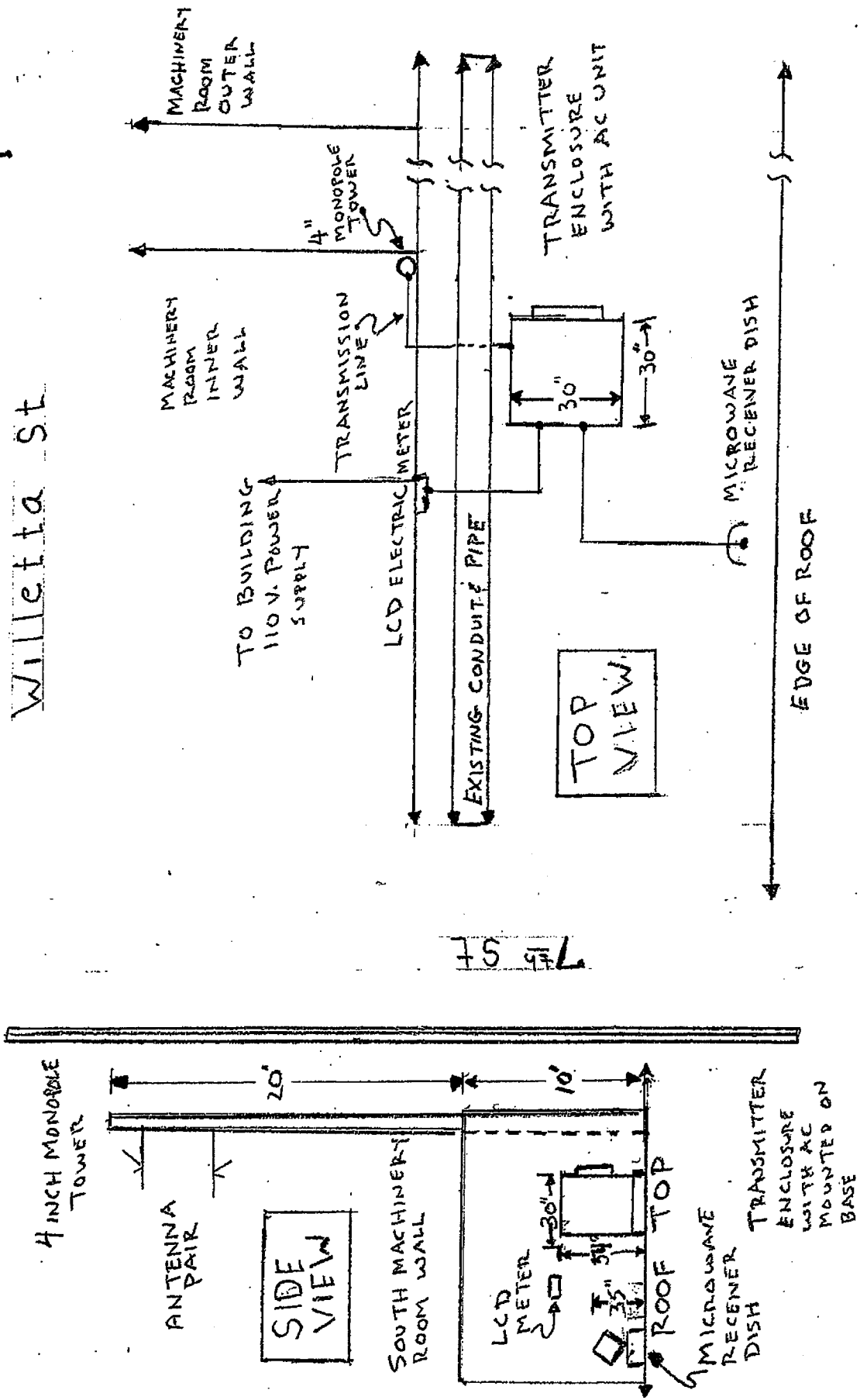
Projected Expenses

Station Manager (15 hours/week; \$20 per hour)	15,600
Benefits at 7%	1,100
Station Engineer (on call)	500
Underwriting commission	2,400
Rent	9,000
Utilities	900
Copyright fees (music)	500
Web Page	240
Marketing Materials	500
Insurance	400
Printing	200
Office Supplies	200
Equipment Maintenance and Repair	300
Organization Memberships	600
Event Expenses	200
Membership Expenses	200
Total Estimated Expenses	32,840
End of Year Balance	(340)

Cash reserve as of January 1, 2016	4,500

Southwest Heritage Foundation Letter of Intent for Roof License

Exhibit 2 Schematic of Transmitter and Tower Installation

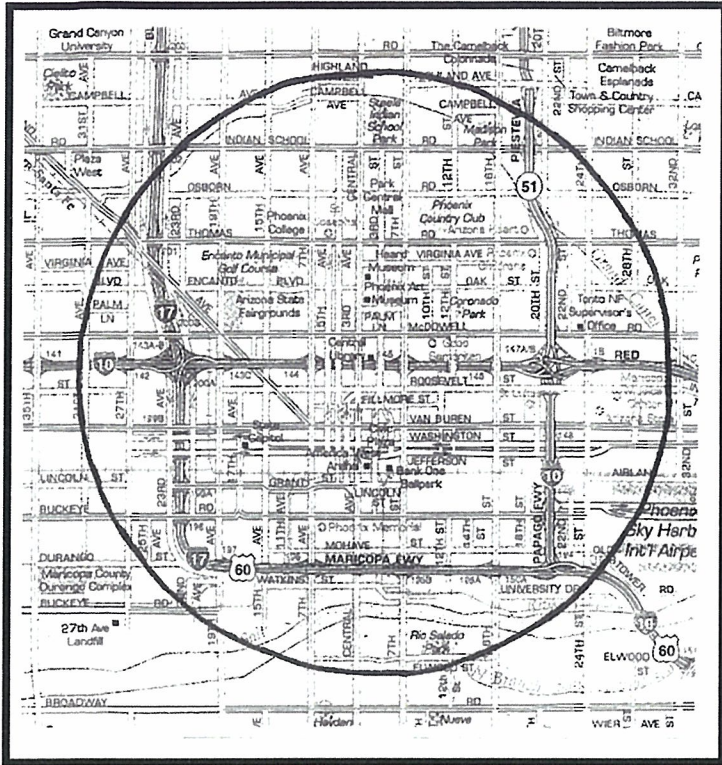


Willetta St

75 511

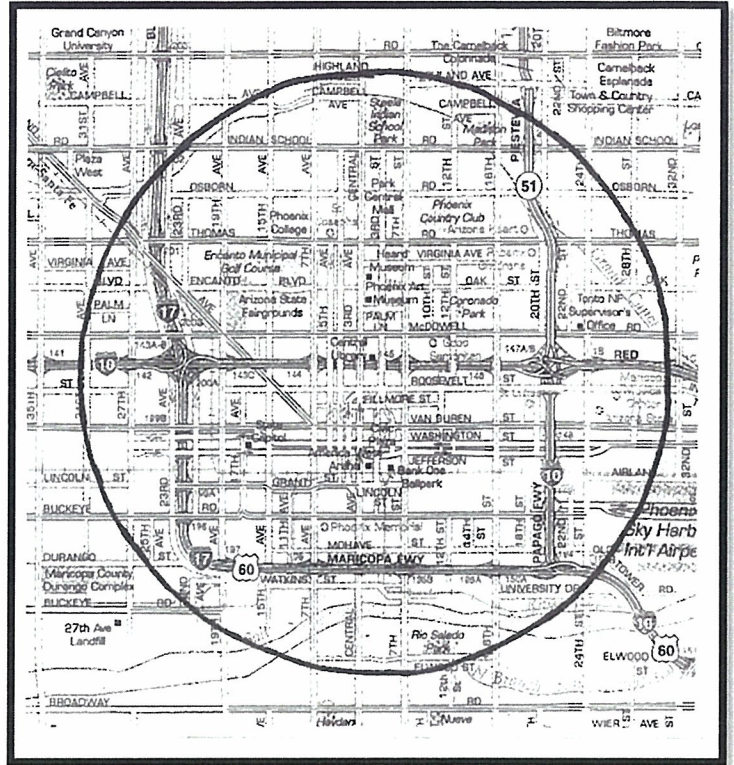
KPCR 93.7
The Voice of the Valley in the Heart of the City

Coming Soon:
FM Radio for
Central Phoenix



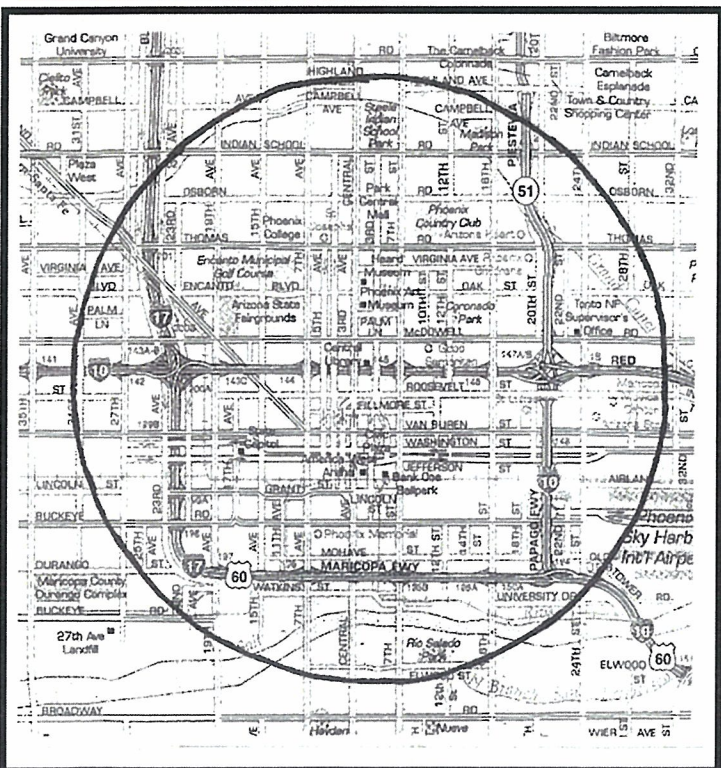
KPCR 93.7
The Voice of the Valley in the Heart of the City

Coming Soon:
FM Radio for
Central Phoenix



KPCR 93.7
The Voice of the Valley in the Heart of the City

Coming Soon:
FM Radio for
Central Phoenix



KPCR 93.7
The Voice of the Valley in the Heart of the City

Coming Soon:
FM Radio for
Central Phoenix

