

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

August 18, 2017

Mark Lipp
202.719.7503
MLipp@wileyrein.com

BY ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW TW-A325
Washington, DC 20554

Re: Request to Correct Application
FCC File No. BNPFT-20170801ABT (Facility ID No. 201412)
Multicultural Radio Broadcasting Licensee, LLC

Dear Ms. Dortch:

Multicultural Radio Broadcasting Licensee, LLC ("MRBL"), hereby requests that the Commission accept a correction to the channel number specified in the above referenced application. Specifically, MRBL requests that Question 1 of the Tech Box be changed from Channel 244 to Channel 224. The supporting engineering documentation and Engineering Statement demonstrates that the applicant inadvertently specified the incorrect channel number. However, the attached engineering statement and exhibits, which were prepared before the application was filed but not included with the Form 349 Tech Box based on the instructions set forth in the Public Notice (issued June 6, 2017, DA 17-533), clearly demonstrate that Channel 224 was the intended channel.

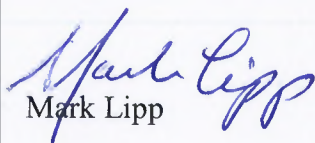
MRBL's engineering consulting firm has confirmed that there are no other pending conflicting applications filed during the window period. Thus, no other applicant will be adversely affected by the requested correction. The proposed translator would rebroadcast Station KALI(AM) in Pomona, California. This AM station currently operates with only 150 Watts at night. The public interest would be served by enabling this FM translator to provide service to areas not adequately reached by the AM station at night.

On behalf of Multicultural Radio Broadcasting Licensee, LLC, please let me know if there are any questions.



Marlene H. Dortch, Secretary
August 18, 2017
Page 2

Sincerely,


Mark Lipp

Attachment

cc: James Bradshaw, Audio Division, Media Bureau
Robert Gates, Audio Division, Media Bureau

Supplemental Engineering Statement

prepared for

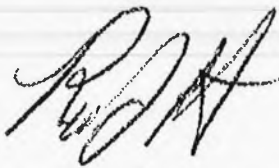
Multicultural Radio Broadcasting Licensee, LLC

NEW(FX) West Covina, California

Associated Facility ID 56779

Channel 224D 0.25 kW 62 meters AGL

An application for new cross-service translator was filed for KALI(AM) (file number BNPFT-20170801ABT). However, the short form 349 was inadvertently filled out with Channel number 244. The correct Channel number is 224. For purposes of the translator filing, the proposed facility on both Channels 224 and 244 can be considered a singleton, as no Mutually Exclusive applications have been filed for nearby service. However, only Channel 224 protects all other facilities.



Robert J. Clinton

For Cavell, Mertz & Associates, Inc.

Exhibit 10 - Comprehensive Engineering Statement

prepared for

Multicultural Radio Broadcasting Licensee, LLC

NEW(FX) West Covina, California

Associated Facility ID 56779

Channel 224D 0.25 kW 62 meters AGL

Multicultural Radio Broadcasting Licensee, LLC ("*Multicultural*"), seeks to propose a new cross-service FM translator for standard broadcast station KALI(AM). The instant application is part of the Auction 99 filing window¹. In particular, *Multicultural* proposes to use one of the towers employed for the KALI antenna array having FCC Antenna Structure Registration Number (ASRN) 1238907. The NAD-27 coordinates for this tower are: 34° 01' 48.0" N, 117° 43' 37.3"W. The proposed antenna system will be directional (a Scala CA2-CP), and will be mounted at 62 meters AGL. An ERP of 250 Watts (0.25 kW) is being specified.

Allocation Considerations

The location of the 60 dB μ coverage contour of the licensed and proposed translator lies within the 40 km (25-mile) radius of the licensed coordinates of KALI(AM), as shown in the map provided as **Figure 1**. As demonstrated, the proposed translator coverage contour lies completely within the 2 mV/m contour, as well as the 40 km radius of KALI(AM), thus complying with §74.1201(g) of the Commission's Rules.

The results of a study of nearby FM facilities on co-channel, adjacent-channel, and intermediate frequencies was conducted to identify which stations require further study to demonstrate compliance under §74.1204 and is summarized in the attached **Table I**.

Figure 2 provides a map of the co-channel stations of particular interest. As shown, there is no prohibited contour overlap caused from this proposal to other co-channel facilities.

Figure 3 depicts the protected contours of second adjacent stations KRRL(FM) and KCBS-FM. The proposed facility is within the 54 dB μ protected contours of both KRRL(FM)² and KCBS-FM. However, the proposed facility's transmitter site is located at the 84.275 dB μ contour of

¹ Public Notice Filing Instructions for Cross-Service FM Translator Auction Filing Window for AM Broadcasters to be Open July 26 – August 2, 2017, Released June 6, 2017, DA 17-533.

² The KRRL-FM-1 facility is also shown, but it is well beyond the pertinent interfering contour of this proposal.

Comprehensive Engineering Statement

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KCBS-FM and the 85.868 dB μ contour of KRRL(FM), as shown. Protection of second-adjacent stations is achieved pursuant to §74.1204(d) by demonstrating that the proposed translator's interfering contour does not reach populated areas. Based on the -40 dB desired-to-undesired ratio specified in §74.1204(a)(3), the appropriate second-adjacent interfering signal level at this location for KCBS-FM is 124.275 dB μ ; for KRRL(FM) it is 125.868 dB μ . Using the distance from the proposed antenna and the proposed antenna vertical plane (elevation) pattern, predicted field strengths were calculated and plotted in **Figure 4**. As shown, maximum field strength of less than 118 dB μ is predicted at the ground level in the vicinity of this facility. Thus, considering the antenna height and elevation pattern of the proposed antenna, the proposed translator signal does not reach signal strength levels that would be considered interference to surrounding population.

The proposed site is located within the 320 km coordination distance to the Mexican border required for translators specified in §74.1235(d), however, the location of the 60 dB μ contour does not lie within 116.3 km of the Mexican border. This facility will be located over 1600 miles from the Canadian border. The nearest FCC monitoring station is 548 km distant at Livermore, CA. The proposed site is over 3400 km from the Greenbank coordinates and approximately 1300 km from Table Mountain. This distance exceeds the threshold minimum distance specified in §73.1030 that would suggest consideration.

It is therefore believed that the proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

Environmental Considerations

The proposed facility will operate with a circularly-polarized ERP of 250 Watts with a directional antenna, at 62 meters AGL on one of the towers of the KALI(AM) array. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Because no change in structure height is proposed, no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Comprehensive Engineering Statement

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Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility meets the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The general population/uncontrolled maximum permitted exposure ("MPE") limit specified in §1.1310 for the entire FM broadcast band is $200 \mu\text{W}/\text{cm}^2$. For the purpose of this study, "public access" will be considered at the base of the tower at a location two-meters above ground.

Using the FCC's FM Model program and a worst-case EPA Type 1 antenna it was determined that the proposed facility would contribute a worst-case RF power density of $2.79 \mu\text{W}/\text{cm}^2$ at two meters above ground level near the antenna support structure, or 1.4 percent of the general population/uncontrolled limit.

§1.1307(b)(3) states that facilities at locations with multiple emitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent of the pertinent MPE limit. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy will not be caused by the proposal at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's

Comprehensive Engineering Statement

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guidelines. Nevertheless, tower access will continue to be restricted and controlled through the use of a locked gate. According to information provided by the applicant, appropriate RF exposure warning signs are posted. In the event that maintenance or other workers gain access to the tower, power output of the translator will be decreased or shut off to protect workers.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations. Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

Conclusion

It is therefore believed that the proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect.

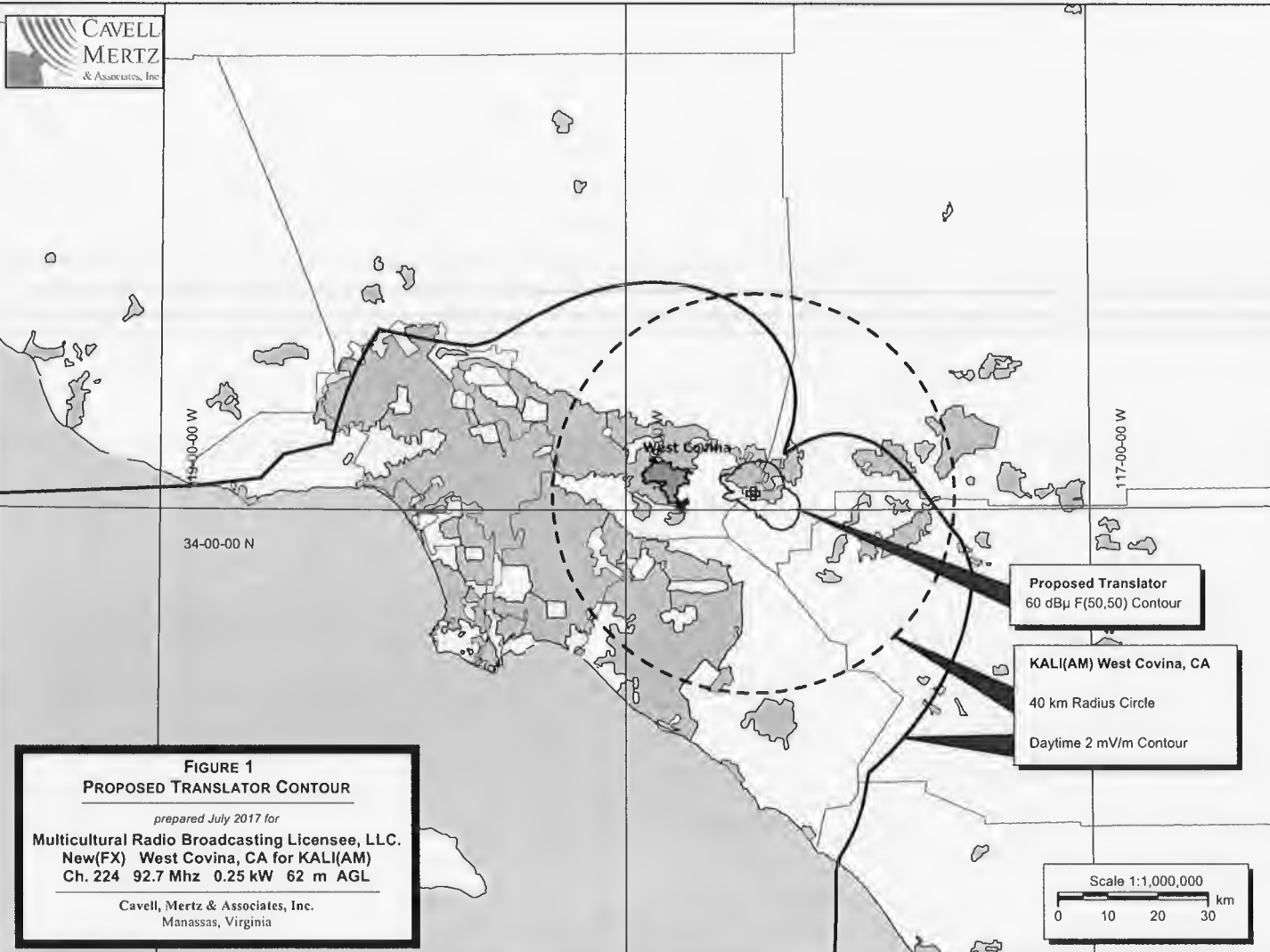


FIGURE 1
PROPOSED TRANSLATOR CONTOUR

prepared July 2017 for

Multicultural Radio Broadcasting Licensee, LLC.
New(FX) West Covina, CA for KALI(AM)
Ch. 224 92.7 Mhz 0.25 kW 62 m AGL

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Exhibit 10 - Table I
ALLOCATION SPACING SUMMARY FOR NEW(FX)
 prepared for
Multicultural Radio Broadcasting Licensee, LLC
 NEW(FX) West Covina, CA
 Associated Facility ID 56779
 Ch. 224D 0.25 kW 62 m AGL

Channel Status	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Required Clear
221A LIC	KSOQ-FM FM	ESCONDIDO, CA BLH-19970814KB	49206	33 06 39 117 09 13	0.58 312	115.01 152.38	0.00 0.00
221D LIC	K221GB FX	BARSTOW, CA BLFT-20170123AAA	121962	34 54 04 117 02 02	0.027 0	115.73 33.07	0.00 0.00
222B LIC	KRRL FM	LOS ANGELES, CA BMLH-19921021KA	35022	34 13 36 118 03 57	43.0 887	38.12 305.13	0.00 0.00
222D LIC	KRRL-FM1 FB	SANTA CLARITA, CA BLFTB-20150901ABZ	198144	34 19 48 118 35 56	0.32 0	87.00 292.83	0.00 0.00
223L1 LIC	KQLH-LP FL	YUCAIPA, CA BLL-20170119AAD	195813	34 01 18 117 02 20	0.1 0	63.56 90.64	0.00 0.00
223C1	XHRM-FM FM	TIJUANA, BN -	165711	32 30 14 117 02 43	100.0 200	181.12 159.33	129.00 52.12
224L1 CP	NEW FL	PASADENA, CA BNPL-20131114AXZ	195577	34 10 20 118 05 47	0.1 -234.9	37.56 295.06	0.00 0.00
224D LIC	K224DK FX	FONTANA, CA BLFT-20080304ACN	139831	34 01 19 117 17 43	0.005 0	39.88 91.17	0.00 0.00
224A LIC	KYLA FM	FOUNTAIN VALLEY, CA BMLD-20121211ABJ	9304	33 36 20 117 48 35	0.69 293	47.70 189.23	0.00 0.00
224D CP	K224EY FX	SAN MARINO, CA BNFFT-20130827ACN	145229	33 44 52 118 20 10	0.01 431.4	64.46 241.00	0.00 0.00
224L1 APP	KLQS-LP FL	AGUA DULCE, CA BPL-20170605AAI	195731	34 32 11 118 06 24	0.1 -31.52494	66.16 328.31	0.00 0.00
224A LIC	KYZA FM	ADELANTO, CA BLED-20170227ABA	1244	34 36 44 117 17 30	0.285 452	76.00 31.57	0.00 0.00
224D LIC	KYRA-FM1 FB	MALIBU VISTA, CA BLFTB-20070222AAH	164724	34 05 09 118 47 06	0.045 0	97.88 273.94	0.00 0.00
224A LIC	KYRA FM	THOUSAND OAKS, CA BMLD-20121211ABG	21689	34 12 21 118 49 04	3.1 141	102.51 281.32	0.00 0.00
224A CP	KYRA FM	THOUSAND OAKS, CA BPED-20121227AAJ	21689	34 09 53 118 54 08	1.4 208	109.48 278.21	0.00 0.00
224A CP	KYRA FM	THOUSAND OAKS, CA BPED-20121227AAJ	21689	34 09 53 118 54 08	1.4 208	109.48 278.21	0.00 0.00

Exhibit 10 - Table I

(continued)

ALLOCATION SPACING SUMMARY FOR NEW(FX)

prepared for

Multicultural Radio Broadcasting Licensee, LLC

NEW(FX) West Covina, CA

Associated Facility ID 56779

Ch. 224D 0.25 kW 62 m AGL

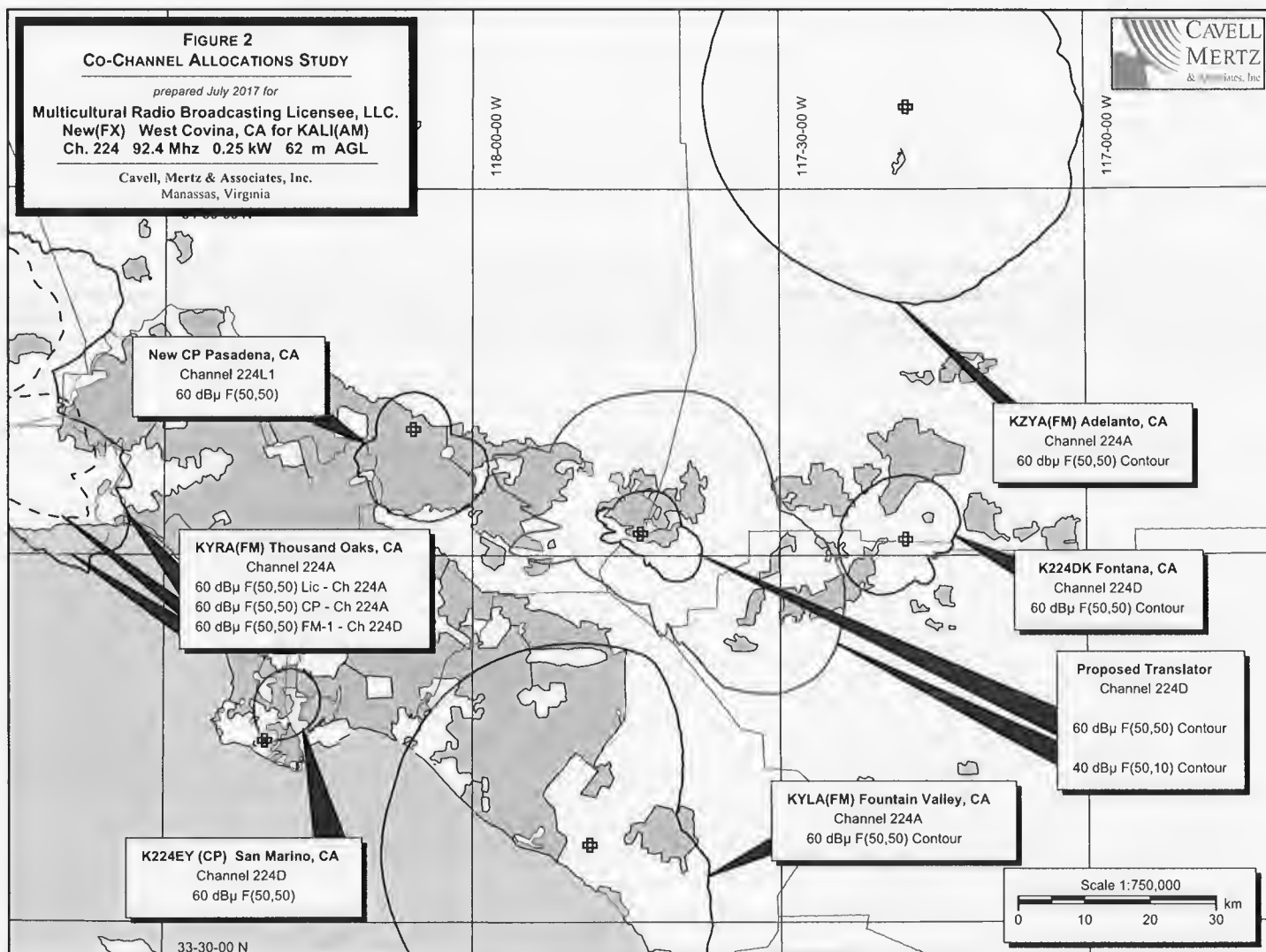
Channel Status	Call Service	Sign File Number	City/State	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Required Clear
224A LIC	KKUU FM	INDIO, CA BLH-20021210ABQ		11658	33 52 15 116 13 37	4.2 120	139.78 96.87	0.00 0.00
225A LIC	KXFG FM	MENIFEE, CA BMLH-20130301ABD		63912	33 35 34 117 08 51	6.0 100	72.32 132.07	0.00 0.00
226B LIC	KCBS-FM FM	LOS ANGELES, CA BLH-20100818AAQ		9612	34 13 55 118 04 18	27.5 1074	38.90 305.38	0.00 0.00
226D LIC	K226BT FX	INDIO, CA BLFT-20160506AAX		140886	33 45 58 116 14 01	0.25 0	141.20 101.60	0.00 0.00
227A LIC	KBHR FM	BIG BEAR CITY, CA BLH-20050103AJG		51566	34 16 41 116 47 31	1.3 214	90.51 71.96	0.00 0.00
227D LIC	K227BX FX	PALM SPRINGS, CA BLFT-20141003ABX		155851	33 51 56 116 26 09	0.01 0	120.74 98.37	0.00 0.00
227L1 LIC	KF2R-LP FL	FRAZIER PARK, CA BLL-20170130ACC		194173	34 49 14 118 56 10	0.1 0	141.59 308.74	0.00 0.00
227L1 LIC	K0X2-LP FL	VENTURA, CA BLL-20160603AAU		197322	34 17 47 119 16 21	0.002 0	145.55 282.20	0.00 0.00
277A LIC	KTMQ FM	TEMECULA, CA BLH-20010109AAA		85012	33 28 51 117 10 58	1.25 218	79.07 140.37	10.00 69.07
277D APP	K277DH FX	SAN DIEGO, CA BPFT-20170615AAS		151282	32 50 21 117 14 57	0.25 0	139.35 161.36	10.00 129.35
277D LIC	K277DH FX	SAN DIEGO, CA BLFT-20170418AAD		151282	32 49 43 117 08 40	0.25 0	143.84 157.81	10.00 133.84
277D CP	K292CR FX	SAN DIEGO, CA BPFT-20160729AKS		34426	32 43 48 117 05 03	0.05 0	156.10 157.39	10.00 146.10
277D LIC	K277DG FX	SAN DIEGO, CA BLFT-20161205ABI		141805	32 41 39 117 07 17	0.015 0	158.51 159.10	10.00 148.51
278B CP	KOST FS	LOS ANGELES, CA BXPB-20161024ABO		34424	34 13 35 118 03 58	12.5 891	38.12 305.08	15.00 23.12
278B CP	KOST FS	LOS ANGELES, CA BXPB-20161024ABO		34424	34 13 35 118 03 58	12.5 891	38.12 305.08	15.00 23.12
278B LIC	KOST FM	LOS ANGELES, CA BLH-20170207AAC		34424	34 13 35 118 03 58	11.5 949	38.12 305.09	15.00 23.12
278D LIC	KOST-FM1 FB	SANTA CLARITA, CA BLFTB-20150901ACI		198146	34 19 48 118 35 56	0.5 0	87.00 292.83	10.00 77.00

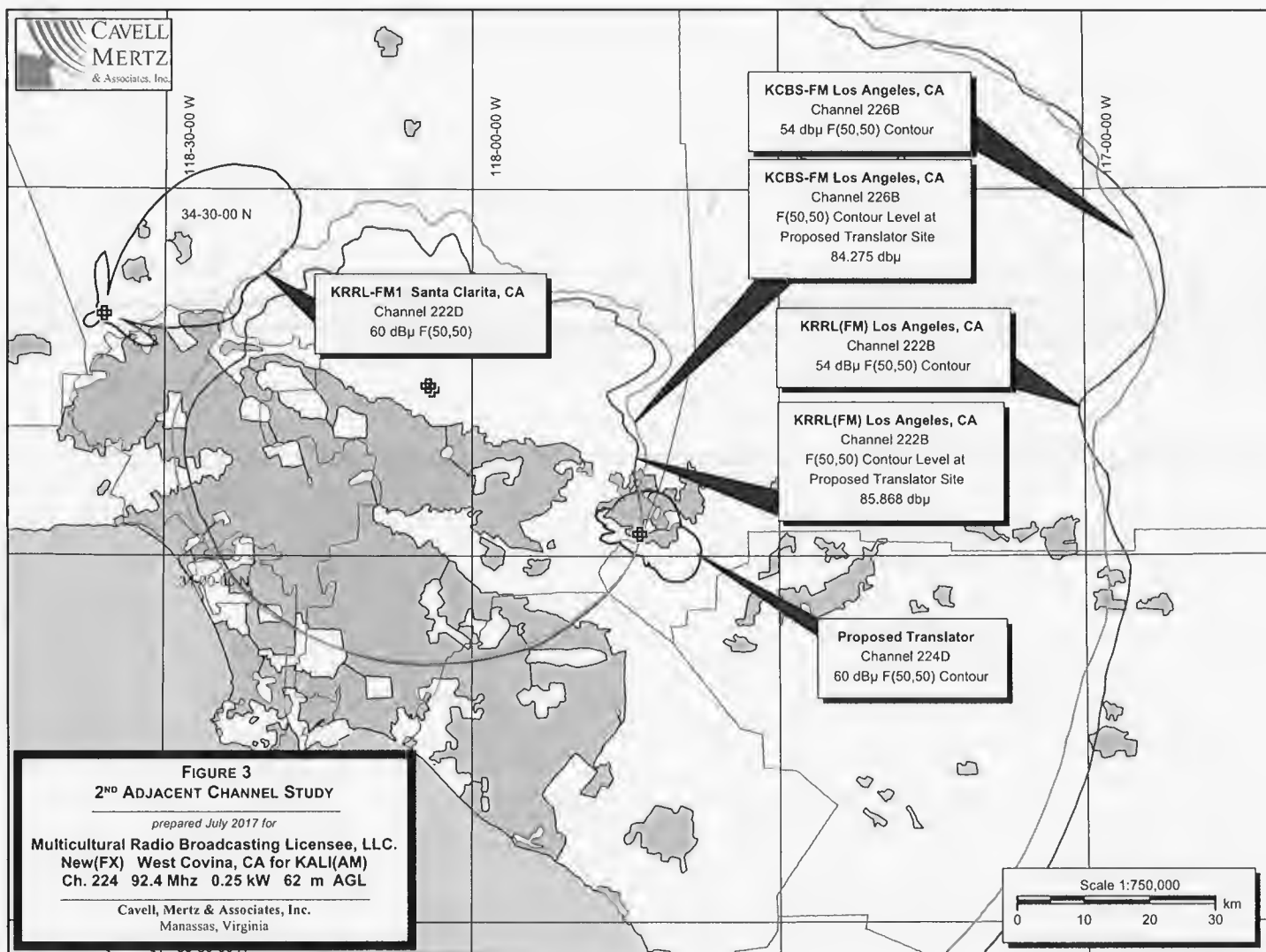
FIGURE 2
CO-CHANNEL ALLOCATIONS STUDY

prepared July 2017 for

Multicultural Radio Broadcasting Licensee, LLC.
New(FX) West Covina, CA for KALI(AM)
Ch. 224 92.4 Mhz 0.25 kW 62 m AGL

Cavell, Mertz & Associates, Inc.
Manassas, Virginia





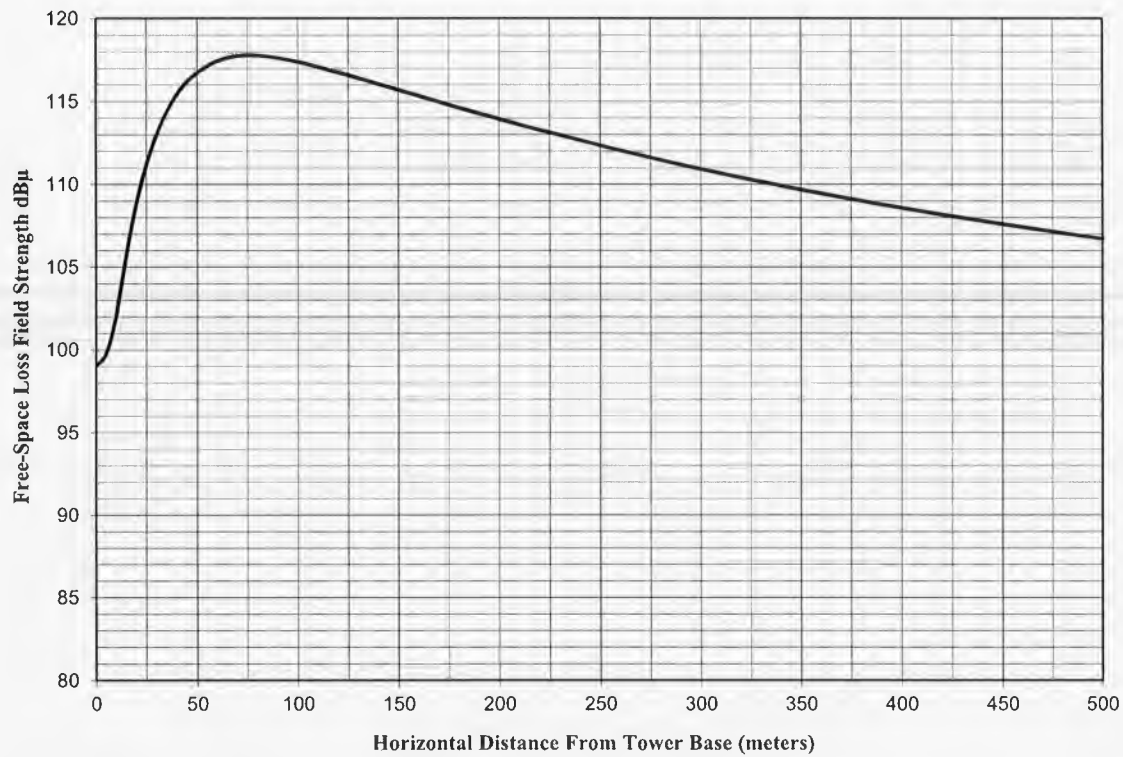


FIGURE 4
PREDICTED GROUND LEVEL FIELD STRENGTHS

prepared July 2017 for

Multicultural Radio Broadcasting Licensee, LLC.
New(FX) West Covina, CA for KALI(AM)
Ch. 224 92.7 MHz 0.25 kW 62 m AGL

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

