## LEGALWORKS APOSTOLATE, PLLC

2018 APPruser 4V. NPMN, 12: 27 Managing Member ATTORNEYS AT LAW

4 FAMILY LIFE LANE FRONT ROYAL, VIRGINIA 22630

April 3, 2018

Accepted / Filed

ORIGINAL

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

APR - 3 2018

Federal Communications Commission Office of the Secretary

RE: Salt & Light Radio, Inc. AM Station KTFI, Twin Falls, ID (Facility ID:69857) Form 302-AM Application for License to Cover Modified Permit

Dear Secretary Dortch:

Salt & Light Radio, Inc., by counsel, hereby supplies on FCC Form 302-AM its application for a broadcast license to cover the most recent modification of its construction permit for the above-referenced facility.

Please do not hesitate to contact the undersigned regarding any questions in this matter.

Sincerely,

Stuart W. Nolan, Jr. Managing Attorney

CC: Susan Crawford, Audio Division (email) Penelope Dade, Audio Division (email) Annette Smith, Audio Division (email)

Enclosure

Accepted / Filed

Federal Communications Commission Washington, D. C. 20554	Approved b 306 Expires 0	0-0627	FOR FCC USE		AF	PR - 3 2018	
FCC 302-AM			ONLY		Federal Com	munications Commission	
APPLICATION FOR AM			I		Office	e of the Secretary	
BROADCAST STATION LICE	NSE		FOR CO	OMMISSIC	N USE ONLY	Lal - ADil	
(Please read instructions before filling out	form.		FILE N	o. pl	20180	903 ABH	
SECTION I - APPLICANT FEE INFORMATION							
1. PAYOR NAME (Last, First, Middle Initial)							
Salt & Light Radio, Inc.							
MAILING ADDRESS (Line 1) (Maximum 35 characters) 5601 CASSIA ST.	)						
MAILING ADDRESS (Line 2) (Maximum 35 characters	)						
CITYBOISE		STATE	OR COUN	ITRY (if for	eign address)	ZIP CODE 83303	
TELEPHONE NUMBER (include area code) (208) 344-4774		CALLE	ETTERS		OTHER FCC ID FCC ID 69	ENTIFIER (If applicable)	
2. A. Is a fee submitted with this application?							
B. If No, indicate reason for fee exemption (see 47 C	C.F.R. Section						
Governmental Entity	mmercial educ	cational lic	ensee	Ot Ot	her (Please explai	n).	
			eneco			.,,	
C. If Yes, provide the following information:							
Enter in Column (A) the correct Fee Type Code for the	e service you	are applyi	ng for. Fe	e Type Co	des may be found	I in the "Mass Media Services	
Fee Filing Guide." Column (B) lists the Fee Multiple ap	plicable for th	is applicat	ion. Enter	tee amoun	it due in Column (	C).	
(A) (B)			(	C)			
	-		FEE DUE	FOR FEE			
			TYPE (	CODE IN IMN (A)		FOR FCC USE ONLY	
	1	\$					
To be used only when you are requesting concurrent ac	tions which re	sult in a re	quirement	to list more	than one Fee Tv	me Code	
(A) (B)		out in a ro		C)			
	1	\$		0/		FOR FCC USE ONLY	
				MOUNT			
ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE.				WITH THI		FOR FCC USE ONLY	
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.		\$					

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SECTION II - APPLICAN									
1. NAME OF APPLICANT Salt & Light Radio, Inc.									
MAILING ADDRESS 5601 CASSIA S	Τ.		2						
сітч Boise			state ID		zig code				
2. This application is for:	Commercial	ſ	✓ Noncomn	nercial					
	AM Direc	tional		on-Directional					
Call letters KTFI	Community of License Twin Falls		tion Permit File No. D141113AHN	Modification of Construction Permit File No(s). BP-20161102ABP	Expiration Date of Construction Perm 12/05/2019				
3. Is the station no accordance with 47 C.F	ow operating pursuant .R. Section 73.1620?	to auto	matic program	test authority in	✓ Yes _	No			
If No, explain in an Exhibit.									
4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?									
If No, state exceptions in	If No, state exceptions in an Exhibit.								
5. Apart from the change the grant of the underl representation contained	any statement or	Yes 🖌	No						
representation contained in the construction permit application to be now incorrect?   Exhibit No.     If Yes, explain in an Exhibit.   Exhibit No.									
	ed its Ownership Report ce with 47 C.F.R. Sectior			ership	Yes	No			
If No, explain in an Exhil	bit.				Does not a Exhibit No.	ipply			
7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to									
another governmental un If the answer is Yes, a involved, including an id (by dates and file numt information has been of required by 47 U.S.C. So of that previous submiss the call letters of the sta		II disclos r adminis n of the nection ant need file numb e applica	sure of the pers strative body an litigation. Wh with another a only provide: (i per in the case of ation or Section	ons and matters d the proceeding ere the requisite pplication or as ) an identification of an application, 1.65 information	Exhibit No.				
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8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

If Yes, provide particulars as an Exhibit.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

#### CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name	Signature
Keith Pettyjohn	Keith H. Pett
Title President	Date     Telephone Number       04/02/2018     (208) 344-4774

#### WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

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Yes No

Exhibit No.

SECTION III - L	ICENSE APPLICATION ENGIN	EERING DATA		
Name of Applica	nt			
SALT & LIGH	T RADIO, INC.			
PURPOSE OF A	UTHORIZATION APPLIED FOR:	(check one)		
X s	Station License	Direct Meas	surement of Power	
1. Facilities auth	orized in construction permit		•	
Call Sign	File No. of Construction Permit	Frequency	Hours of Operation	Power in kilowatts
KTFI	(if applicable) BP-20161102ABP	(kHz) 1270	Unlimited	Night Day 5.0
2. Station location	n		1	-
State			City or Town	
Idaho			Twin Falls	
3. Transmitter lo	cation			
State	County		City or Town	Street address
ID	Twin Falls		Twin Falls	(or other identification) 415 Park Ave
4. Main studio lo	cation			•
State	County		City or Town	Street address (or other identification)
ID	Ada		Boise	5601 W. Cassia Street
5. Remote contro	ol point location (specify only if au	thorized direction	al antenna)	
State	County		City or Town	Street address (or other identification)

6.	Has type-approved stereo generating equipment been installed?	Yes	X No
7.	Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?	Yes	No No
		X Not	Applicable
	Attach as an Exhibit a detailed description of the sampling system as installed.	Exhibit N	No.

				en 11			
8. Operating constants:							
RF common point or antenna cu	irrent (in amperes	) without	RF common point or antenna current (in amperes) without				
modulation for night system			modulation for		, I.,		
3.3	23		Contraction - Resources Associate Sectors - Device	7.7	9		
Measured antenna or common p	Measured ante	nna or common r	oint reactance (in	ohms) at			
operating frequency	operating frequ	ency		onno) at			
Night Day			Night		Day		
82.4	82.4		+j40.6		+j40.6		
Antenna indications for directional operation							
	Antenna		Antenna monitor sample current ratio(s)		Antenna base currents		
Towers	Phase reading	(s) in degrees					
	Night	Day	Night	Day	Night	Day	
Manufacturer and type of antenr	na monitor:						

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#### **SECTION III - Page 2**

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator Uniform cross-section guyed steel	radiator above base	above ground (without	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
tower	121.9	125.5	125.5	Exhibit No. N/A

Excitation

Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

				1	······································		
North Latitude	42 0	32	36	West Longitude	114	28	14

If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No. Exhibit No.

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

None. Ground system is as specified in construction permit.

11. Give reasons for the change in antenna or common point resistance.

New Diplex Installation

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Series

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Thomas S. Gorton	Signature (check appropriate box below)			
Address (include ZIP Code)	Date			
Hatfield & Dawson Consulting Engineers 9500 Greenwood Ave N.	January 3, 2018			
Seattle, WA 98103-3012	Telephone No. (Include Area Code)			
	206-783-9151			
Technical Director	X Registered Professional Engineer			
Chief Operator	Technical Consultant			

**Technical Consultant** 

Other (specify)

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## SALT & LIGHT RADIO, INC. Form 302-AM License Application

## **Explanation re Condition (4)**

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Please note that although Condition (4) on the permit states that the applicant must submit a copy of the agreement between the stations KEZJ and KTFI with respect to tower and equipment access in the resolution of any interference, no agreement *per se* is necessary inasmuch as both stations are under common ownership and control of the licensee, Salt & Light Radio, Inc.

# KTFI KEZJ Twin Falls, Idaho

# AM Diplex Field Strength Measurements

December 3, 2017

KEZJ, Twin Falls, Idaho, operates with 1kW day and night using a non-directional antenna system.

KTFI, Twin Falls, Idaho, operates with 5.0kW day and 0.86kW night using a non-directional antenna system.

The transmitter site is located at 415 Park Avenue, Twin Falls, Idaho. A measurement site approximately 0.5 miles (0.8 kilometers) from the transmitting tower was chosen at 800 Park Avenue near the intersection of Park Avenue with Blue Lakes Boulevard. At this site, an Anritsu Model MS2721B spectrum analyzer (SN: 115143) was connected to a Model LP-3 broadband shielded-loop Standard H-Field Antenna manufactured by Chris Scott & Associates, to observe the radiated signal. The analyzer was set up in peak acquisition mode.

A Potomac Instruments Model FIM-21 (SN: 855) was used at the same location to take measurements of the diplex emissions within the unit's range.

After a careful review of the measurements, it is believed that any out-of-channel emissions that are products of the diplexing of these two stations are well below a level that could cause harmful interference.

All measurements were made by Thomas P. Lowther, holder of a Senior Radio Engineer Certification with the Society of Broadcast Engineers (SBE), who has been a Broadcast Engineer for over 22 years, and whose qualifications are a matter of record with the SBE.

Thomas lal Dutto

Thomas P. Lowther, CSRTE 2252 Filer Avenue East Twin Falls, ID 83301 (208) 280-3593

#	Mult.	X	Freq., kHz	Sum/Dif.	Mult.	X	Freq., kHz	=	Product, kHz	dBm	V
1	1	Χ	1270	+	1	Х	1450	=	2720		
2	1	Χ	1450	+	1	X	1270	=	2720		
3	1	X	1270	+	2	X	1450	=	4170	-95	
4	1	X	1450	+	2	X	1270	=	3990	-91	
5	2	X	1270			X		=	2540		
6	2	X	1270	+	1	X	1450	=	3990	-91	
7	2	X	1270	-	1	Х	1450	=	1090	-80	2.6mV
8	2	X	1450			Х		=	2900		
9	2	X	1450	+	1	Х	1270	=	4170	-92	
10	2	Χ	1450	-	1	Х	1270	=	1630	-79	0.8mV
11	3	X	1270			Х		=	3810	-80	
12	3	X	1270	-	1	Χ	1450	=	2360		
13	3	X	1450			Х		=	4350		
14	3	X	1450	-	1	Х	1270	=	3080		
15	3	X	1270	-	2	Χ	1450	=	910	-93	0.9mV
16	3	Х	1450	-	2	X	1270	=	1810	-94	
17	3	Χ	1450	-	3	X	1270	=	540		0.05mV
18	4	Χ	1270	-	1	X	1450	=	3630	-94	
19	4	Х	1450	-	1	Х	1270	=	4530		
20	4	Х	1270	-	2	Χ	1450	=	2180		
21	4	Х	1450	-	2	Х	1270	=	3260		
22	4	Χ	1270	-	3	Х	1450	=	730		0.19mV
23	4	X	1450	-	3	X	1270	=	1990		
24	4	X	1450	-	4	X	1270	=	720		0mV
25	1	X	1450	-	1	X	1270	=	180		

### Table 1: Measurement of Products

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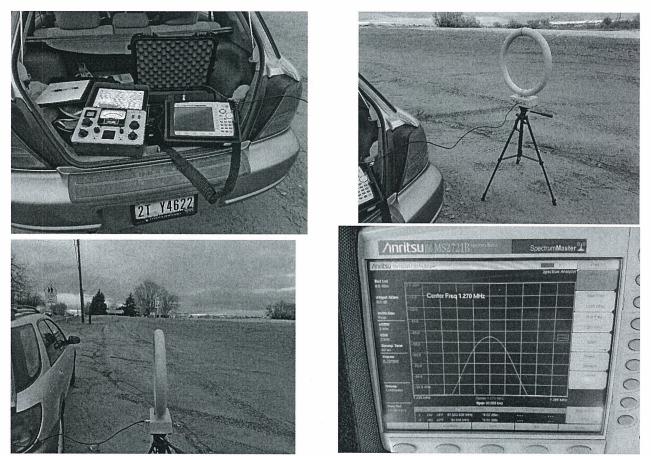
Note: dBm measurements taken with the Spectrum Analyzer; V measurements taken with the FIM-21. Only frequencies within the range of the FIM-21 were measured. Products marked with the following symbol "—" were below the noise floor and therefore no value in dBm was assigned.

Table 2: Fundamental Frequency Measurements

Frequency	=	dBm	V
1270kHz	=	-40dBm	208mV
1450kHz	=	-50dBm	90mV

Note: dBm measurements taken with the Spectrum Analyzer; V measurements taken with the FIM-21

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Photos of the test equipment and measurement site