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March 9, 2020

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, DC 20554

Accepted / Filed

**MAR - 9 2020**

Federal Communications Commission  
Office of the Secretary

Re: Broadcast Station KING-FM (NCE), Seattle, WA  
Facility ID No. 11755  
FRN # 0020868501  
Request for Experimental Authority to Operate with  
Asymmetrical Hybrid Digital Sideband Power

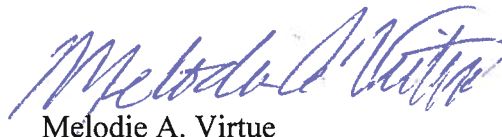
Dear Ms. Dortch:

On behalf of Classic Radio ("Classic"), licensee of non-commercial educational FM radio station KING-FM, Seattle, Washington, pursuant to FCC Rule 5.203, this letter is written to request experimental authority for one year to operate KING-FM full-time with asymmetrical hybrid digital sideband power as set forth in the attached Engineering Exhibit of Hatfield & Dawson Consulting Engineers.

Enclosed is the Anti-Drug Abuse Certification of the licensee. No filing fee is required for this type of request.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,



Melodie A. Virtue

MAV:c11

Enclosures

cc: Rodolfo Bonacci (pdf copy via [rodolfo.bonacci@fcc.gov](mailto:rodolfo.bonacci@fcc.gov))

## ANTI -DRUG ABUSE CERTIFICATION

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862a, 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 pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. §1.2002(b).

☒ Yes

☐ No

Name of Applicant: Classic Radio

Signature:

Brenda Brown

Title:

CEO

Date:

3-6-20

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

**Engineering Statement  
KING-FM Channel 251C Seattle, Washington  
Experimental Request for Asymmetrical Hybrid Digital Operation  
March 2020**

This Engineering Statement has been prepared on behalf of Classic Radio ("Classic"), the licensee of station KING-FM, which operates on Channel 251C at Seattle, Washington, in support of a request for experimental authorization to operate KING-FM with asymmetrical upper and lower sideband power levels in hybrid digital mode.

Classic requests authority to operate at -10 dBc in the lower digital sideband, and -14 dBc in the upper digital sideband. -14 dBc operation is permitted outright, as KING-FM is not a grandfathered superpowered station.

The KING-FM analog ERP is 68 kW. On the lower sideband the ERP will be 6.8 kW, while on the upper sideband the ERP will be 2.7 kW.

In support of the request to operate with -10 dBc in the lower sideband, the undersigned conducted a study which took into account the lower-first-adjacent channel operations in the vicinity. The only nearby full-power station on Channel 250, close enough to require detailed study, is KLVP. KLVP operates on Channel 250C1 at Aloha, Oregon. As is demonstrated by the attached study map, the 49.5 dBu F(50,10) contour from the licensed KING-FM facility does not overlap the 60 dBu F(50,50) contour from the KLVP license facility. While the KING-FM contour comes close to the KLVP contour, inspection at large scale has confirmed that the contours are nearly tangent, but do not overlap.

The contours on this map exhibit were calculated using the standard contour calculation methodology set forth in §73.313 of the Commission's Rules, using average terrain values derived from the 3-arc second terrain database.

**Statement of Engineer**

This Engineering Statement has been prepared by me or under my direct supervision. I am a Partner in the firm of Hatfield & Dawson Consulting Engineers, and am registered as a Professional Engineer in the State of Washington. I hereby declare that the facts set out in the foregoing Engineering Statement, except those of which official notice may be taken, are true and correct.

Signed this 4<sup>th</sup> day of March 2020



Erik C. Swanson, P.E.

Hatfield & Dawson Consulting Engineers

