

Shainis & Peltzman, Chartered

Suite 240
1850 M Street, N.W.
Washington, D.C. 20036

CAPITAL DISTRICT 208

19 NOV 2020 PM 2 L



NEOPOST

FIRST-CLASS MAIL

11/18/2020

US POSTAGE \$000.50⁰⁰



ZIP 20036
041M10282623

MARLENE H. DORTCH, SECRETARY

FEDERAL COMMUNICATIONS COMMISSION

DIGITAL RADIO NOTIFICATION

45 L ST NE

WASHINGTON, DC 20554

Received & Inspected

NOV 23 2020

FCC Mailroom

20554-



NOV 23 2020

Federal Communications Commission
Office of the Secretary

November 17, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
Digital Radio Notification
45 L St. NE
Washington, DC, 20554

RE: KKFT
FACILITY ID: 9136
Informal request for FM Hybrid Digital ERP of -10dBc

Dear Ms. Dortch:

The Evans Broadcast Company, Inc., (Evans) Licensee of station KKFT, Facility ID # 9136 Gardnerville- Minton, NV hereby respectfully requests operation of KKFT with digital ERP in excess of -14dBc.

As noted in Exhibit A, below, the only pertinent full power first adjacent facility within 250km of KKFT on 256C2 is KWLJ, Chester, CA on 255C2. Exhibit A demonstrates that in accordance with Order FCC 99-326, Adopted January 27, 2010, paragraph 20, the KKFT analog F(50,10) field strength at the KWLJ protected analog 60dBu F(50,50) contour is less than 49.5dBu and therefore KKFT is eligible to operate with a maximum permissible FM Digital ERP of -10dBc. There is no identified pertinent first adjacent facility within 250km of KKFT on channel 257.

Based upon the above evaluation, KKFT is eligible to operate with -10dBc on both the upper and lower sidebands.

Evans hereby supplies the following information in support of this request:

1. *Certification of facilities:* Evans hereby certifies that the facilities of KKFT conform to the iBiquity Digital Corporation (Xperi) hybrid FM specifications.

2. *Technical Reference:* In the event of interference, questions should be directed to Evans owner, Jerry Evans at (775) 884-8000.

3. *Technical Facilities:* Low Level combined common amplification

Analog TPO: 3.024kW

Digital TPO: 0.302kW

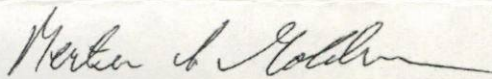
Analog ERP: 1.9kW

Digital ERP: 0.19kW

4. *Radiation Exposure Certification:* Evans certifies that the KKFT digital operations will not cause human exposure to levels of radio frequency radiation in excess of Section 1.1310 of the Commission's rules and is therefore categorically excluded from environmental processing pursuant to Section 1.1306(b).

5. Applicant hereby certifies that the proposed operation will comply with FCC 73.404, "Interim Hybrid IBOC DAB Operation". the technical specifications specified in the *Order* in MM Docket No. 99-325 are met for KKFT with an Effective Radiated Power of -10dBc in accordance with the procedures set forth in the above referenced docket.

6. Applicant hereby certifies that the analog power of KKFT remains as authorized (1.9kW ERP).



Bert Goldman

Goldman Engineering Mgmt, Inc.

214-395-5067

EXHIBIT A

KKFT Proposed FM Digital ERP at -10dBc (190 watts), 1st Adj Contour Protection

