

NEW FM SANTA CLARA, UTAH, FCC FACILITY ID 203590
COMPREHENSIVE ENGINEERING SHOWING

BACKGROUND

SSR Communications, Inc. (“Applicant”), was the winning bidder in the Commission's Auction 109 for Construction Permit MM-FM1226-A (“Permit”) at Caliente, Nevada, for a new FM Class A station on FM Channel 264 / 100.7 MHz. Applicant was also the initial petitioner in the allotment proceeding, RM-11827, MB 19-57, that resulted in the new allocation at Caliente. Additionally, as part of the original allotment proceeding, Applicant has paid the Commission's requisite new FM station application fee as part of its CDBS filing, BNPH-20181129AAC, FCC Facility ID Number 203590. What follows herein is Applicant's “long form” application for Construction Permit MM-FM1226-A.

SUMMARY

In its application filing herein, Applicant proposes to change the Community of License of the Permit from Caliente, Nevada, to Santa Clara, Utah. This change will represent a preferential arrangement of the FM Table of Allotments, as the larger community of Santa Clara will receive its *first commercial FM service*, while no licensed commercial service will be removed from Caliente. Applicant respectfully asserts that the proposed change herein represents a “minor change” application, as the Caliente and Santa Clara facilities would be mutually-exclusive to each other.

SECTION 73.307(B) NARRATIVE

The community of Santa Clara is deserving of its first commercial FM service. As an initial matter, Santa Clara is an incorporated community, which is generally sufficient for allotment purposes. According to the 2010 United States Census, Santa Clara has 6,003 persons, a value which has risen to 8,417 persons, according to 2019 U.S. Census estimates. Caliente, by contrast, has 1,130 residents in 2010, a value which has fallen to 1,076 persons as of 2019, per the same sources. Santa Clara is a

bona-fide community for allotment purposes, possessing many indicators of community status, including its own United States Post Office and Zip Code (84765), as well as a city hall, police department, fire department, city cemetery, civic organizations, et cetera, that identify as being a part of Santa Clara. Founded in 1854 as one of the oldest communities in southern Utah, Santa Clara has its own long and rich history, clearly independent of any neighboring communities. As such, Applicant respectfully believes that Santa Clara is deserving of its own commercial FM radio service.

The community of Caliente will not be deprived of radio service as a result of the changes contemplated herein. The Facility ID associated with this Permit (203590) has never been licensed to Caliente, nor have there ever been other FM facilities with the same frequency licensed to Caliente in the past. Applicant has not engaged with any Caliente residents, businesses, or government entities to assure or even intimate that FM service will be activated in Caliente. The community of Caliente will not lose radio service if a new FM facility were allocated to Santa Clara, and no new “white” or “gray” allocation area would be created by this proposal.

Applicant believes that a “back fill” allocation is not required in this situation, as an allocation at Santa Clara is clearly a preferential arrangement of the FM Table of Allotments. Apart from the fact that Santa Clara would receive its *first commercial FM service*, far more people would be served by an allocation at Santa Clara. As detailed above, the population of Santa Clara itself is more than five times as large as Caliente (6,003 versus 1,130). The current Caliente proposal would serve 2,516 persons within the F(50,50) 60 dBu primary service contour, per 2010 United States Census block centroid data points. The facility at Santa Clara contemplated herein, by contrast, would serve 123,914 persons, nearly *50 times as many persons*, a figure which is quite likely to increase once 2020 Census values are available. Accordingly, Applicant respectfully asserts that a replacement allotment for Caliente is not necessary under these circumstances, but if the Commission does require such, then there are many suitable FM channels open in the Caliente community that Applicant would be able to propose.

SECTION 73.315 SHOWING

The facility proposed herein, which is fully-spaced under Section 73.207 of the Commission's Rules, would serve all of the Santa Clara, Utah community within a F(50,50) 70 dBu contour.

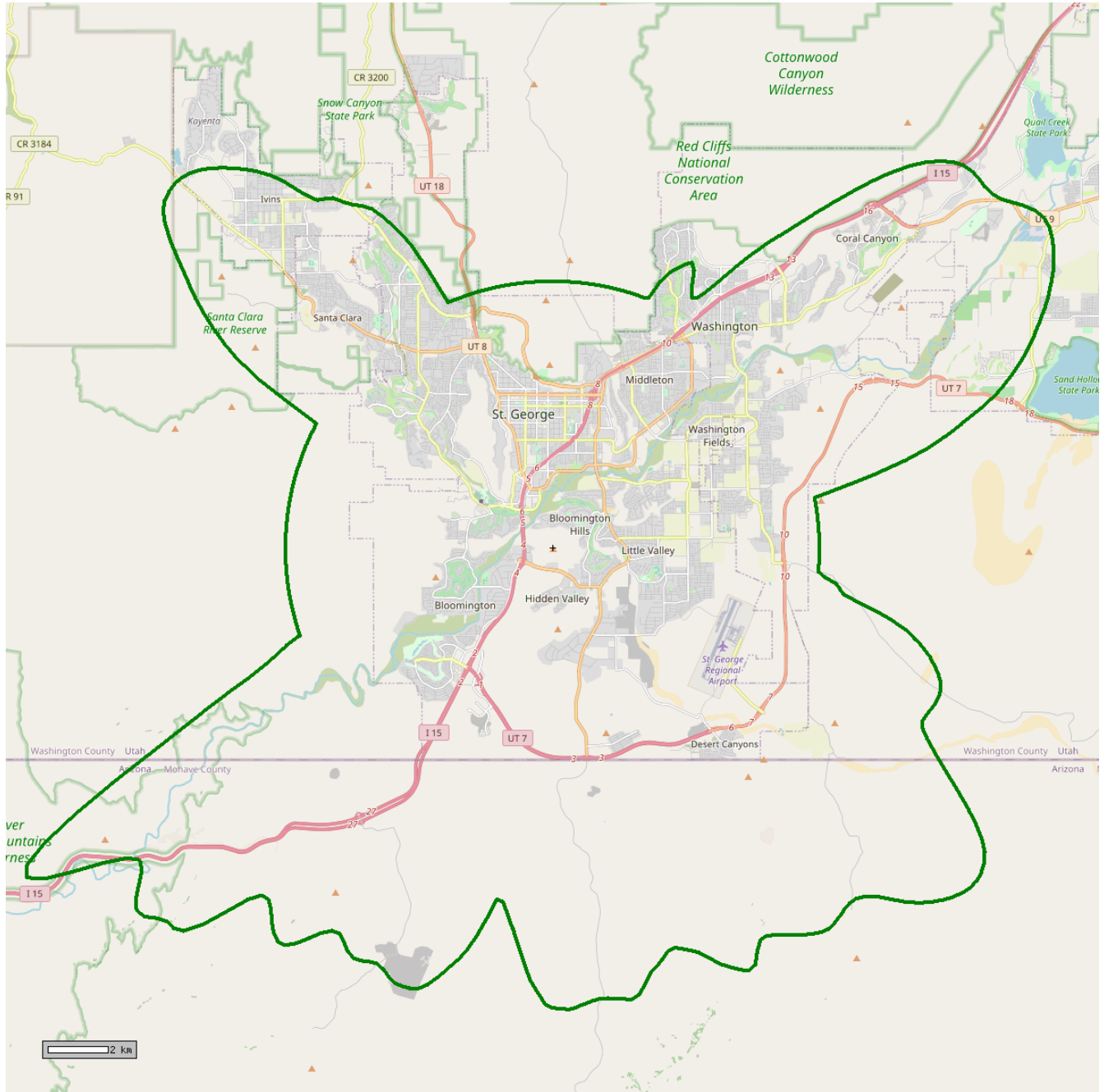


FIGURE 1: The map above depicts the F(50,50) 70 dBu contour of the facility of the Permit contemplated in the application herein. As shown above, the facility would provide 70 dBu city grade service to all of the community of Santa Clara, Utah.

MUTUALLY EXCLUSIVE SHOWING

As shown below, the facility described herein is mutually-exclusive to Applicant's initially-proposed facilities in CDBS Application Number BNPH-20181129AAC. Therefore, it is concluded that Applicant's filing qualifies as a “minor change” FM application.

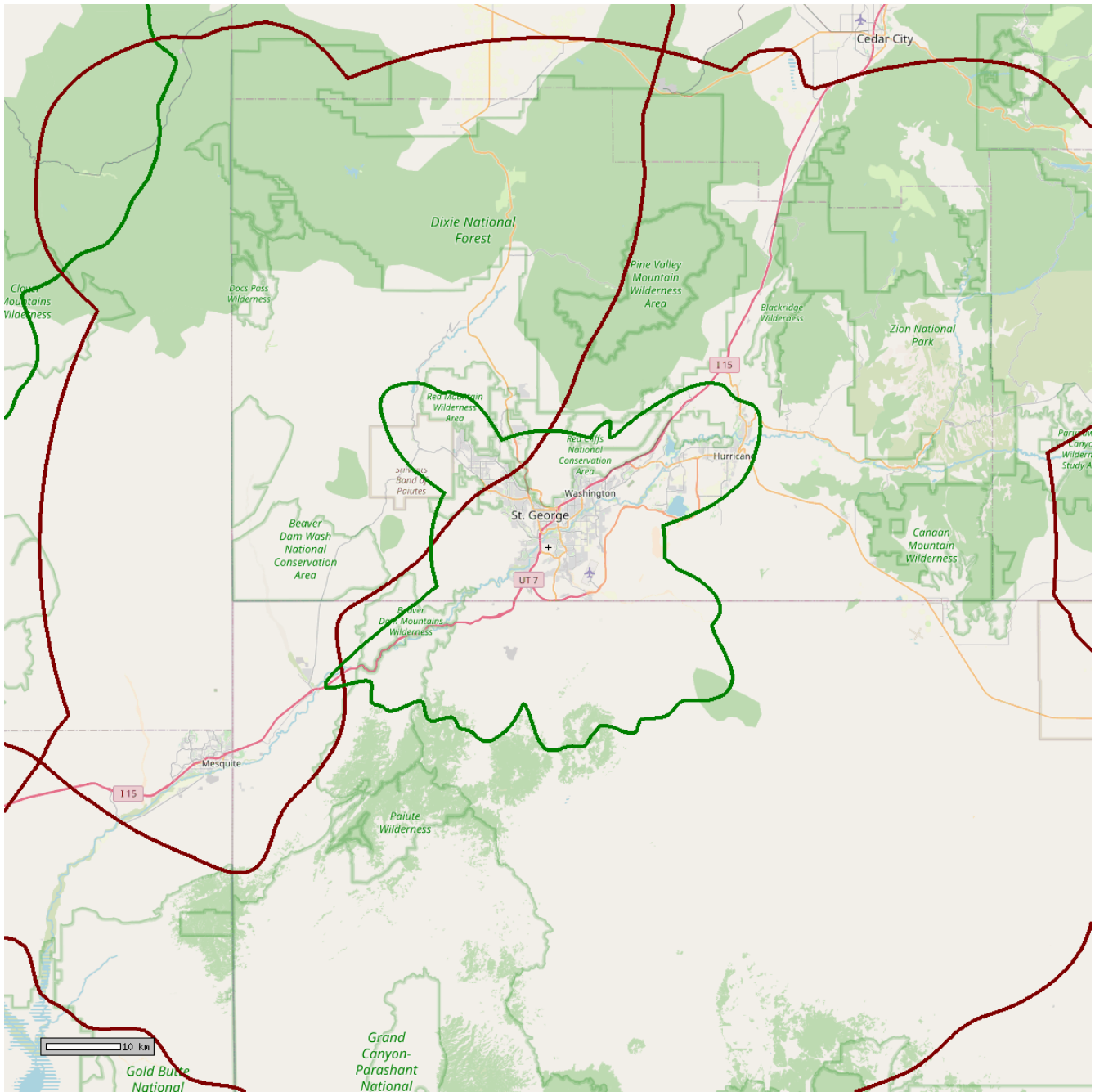


FIGURE 2: The map above depicts the F(50,50) 60 dBu (green) and F(50,10) 40 dBu (dark red) contours of the Caliente allocation (top left) and proposed Santa Clara facility (center). As shown, there is significant contour overlap between the two mutually-exclusive proposed facilities.

73.207 SHOWING

Applicant has proposed facilities that are fully compliant with Section 73.207 of the Commission's Rules, as shown below in Figure 3:

PROPOSED STATION

FCC Facility ID: 203590
Channel: 264A / 100.7 MHz
Community: Santa Clara, Utah
ASRN: 1210537
NAD 27 COORDINATES: 37-03-49 N, 113-34-24 W
NAD 83 COORDINATES: 37-03-49 N, 113-34-27 W

<u>FacID</u>	<u>Application</u>	<u>Call</u>	<u>Type</u>	<u>Chan.</u>	<u>Community</u>	<u>State</u>	<u>Dist.</u>	<u>Min.</u>	<u>Margin</u>	
203590	18513-2019-09-19	NEW	VAC AL	264A	CALIENTE	NV	102.16	115.00	-12.84	*
739247	18546-2019-09-19	NEW	VAC AL	264A	CALIENTE	NV	113.24	115.00	-1.76	*
12560	0f6006.....eb7	KXQQ-FM	LIC	263C	HENDERSON	NV	173.73	165.00	8.73	
164258	76f95d.....eb7	KMXD	LIC	263C	MONROE	UT	182.97	165.00	17.97	
191518	17313-2019-09-19	NEW	VAC AL	266C1	FREDONIA	AZ	99.66	75.00	24.66	

* - This facility is the subject of the application herein.

FIGURE 3 NOTE: The fully-spaced **FM ALLOCATION** coordinates would also be at this location.

RF EXPOSURE SHOWING

In determining RF Exposure at the proposed antenna site, Applicant utilized the Commission's FM Model software, as shown below in Figure 4. Applicant specified a 3-element circularly polarized ring-and-stub FM antenna, centered on 100.7 MHz with element wavelength spacing of 0.85.

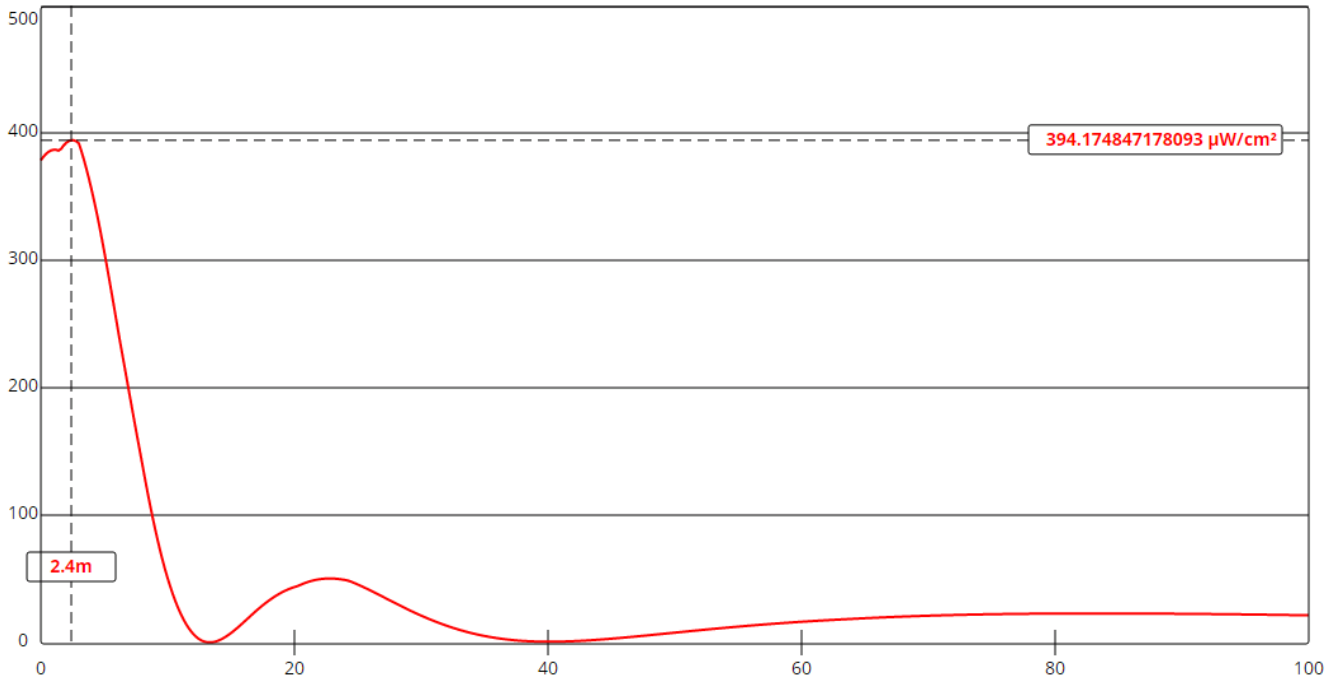


FIGURE 4: The above chart represents RF exposure in microwatts per square centimeter (vertical axis) against the distance from the radiating elements (horizontal axis). Radiation under the acceptable level of 20.0 microwatts per square centimeter is found at a distance of 30.3 meters from the antenna. The transmitter site is located on a hilltop with extremely limited access only to authorized personnel. Signage alerting persons to the potential RF hazards at the site will be placed around the base of the tower's fence enclosure. Additionally, Applicant will limit power or cease transmitting in the event that personnel must be located closer to the transmitter site.