

TECHNICAL STATEMENT
K273BX PINECLIFFE, COLORADO
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
MAY 2010

This Technical Statement is made in support of a minor change application for FM translator station, K273BX licensed to Pinecliffe, Colorado. K273BX seeks to “one step” channel change from its present licensed operation on channel 273D to its third adjacent channel of 276D. It also seeks to increase its Effective Radiated Power from 10 watts to 250 watts, modify its current directional antenna system and relocate to an existing tower site on Squaw Peak. The following will show that the new proposed operation of K273BX will meet all of the Commission's technical requirements for an FM translator station.

The new proposed operation of K273BX specifies a maximum Effective Radiated Power of 250 watts. It will operate with a directional antenna with an “off the shelf” type antenna, or a Scala Model CL-FM-V, vertical polarized yagi type antenna with its maximum lobe oriented at 0 degrees. The antenna will be mounted on an existing tower with an over height of 43 meters above the ground. The antenna will be mounted with a Center of Radiation of 25 meters above the ground, and 3244 meters Above Mean Sea Level. The coordinates of this tower are located at N 39° 40' 31”, W 105° 29' 02”. There are no other broadcast antennas mounted on this tower at this time.

Figure 1 is a detailed interference study conducted on channel 276D with these new proposed facilities. It shows that the new operation of K273BX will not cause any interference to any existing or proposed FM stations on any of the pertinent same channel

or adjacent channels to channel 276, with the exception of KRFX Denver, Colorado operating on channel 278C0, facility ID 29731. The proposed operation of K273BX on 276D is located within the protected 60 dBμ contour of 3rd adjacent channel of KRFX. Figure 2 shows the predicted F(50-50) field strength of KRFX at the proposed K273BX transmitter site is 60.4 dBμ. Therefore, the respective predicted interfering contour F(50-10) generated by the proposed K273BX on channel 276D is an additional 40 dBμ or 100.4 dBμ. Figure 3 shows the coverage area for the 100 dBμ (worse case) interference contour F(50-10) and shows that there is no population in the area of interference. The applicant, Mountain Community Translators, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference. There are no homes nearby the proposed existing tower site, which is a privately owned 40 acre square wooded area, with private access. The transmitter building is uninhabited and does not have indoor plumbing. Should any unforeseen actual interference be caused, the licensee will immediately cease broadcasting with K273BX until such interference can be eliminated.

Figure 4 is a detailed study conducted against a first adjacent channel Construction Permit, BPH-20070314ACY, held by KAVD Parker, Colorado on channel 276C0, facility ID 79249. The 40 dBμ Interference contour being proposed by K273BX will not overlap with the protected 60 dBμ of the proposed KAVD. It should be noted that KAVD is presently still licensed to Limon, Colorado on channel 276C1. The new proposed operation of K273BX on channel 276D, as can be seen in Figure 1, does not come close to overlapping with the licensed operation of KAVD. KAVD is also currently silent. Plus, the above mentioned construction permit expires on May 23,

2010. It is the belief of Mountain Community Translators, LLC, that no construction has begun with this CP for KAVD, thus, it is unlikely, at this late date, that the new facilities specified in the KAVD CP will be completed by time the CP expires.

Figure 1 also shows apparent overlap with a former pending application for a new FM translator located at Wheat Ridge, Colorado on channel 275D, BNPFT-20030312AGW, facility ID 140236, filed by Educational Communications of Colorado Springs, Inc.. While this application still appears in the Commission's CDBS database at the time of this filing, Figure 9 attached shows a request to dismiss this application filed by Educational Communications of Colorado Springs, Inc., filed on December 22, 2010, which stamped in copy was received by the FCC on January 12th, 2010. This application should have been dismissed, if it hasn't already.

Figure 5 shows the proposed 60 dBμ of K273BX will be completely contained inside of the current 60 dBμ predicted coverage contour of the station being rebroadcast, KLDV Morrison, Colorado on channel 216C0, facility ID 12354. The proposed operation of K273BX will be considered a "fill-in" translator for KLDV, thus some of the maximum allowable ERP limits on some of the pertinent radials will be exceeded. However, the maximum ERP on any radial will not exceed 250 watts, thus this proposed operation is in compliance with 74.1235(a).

Figure 6 shows that the proposed operation of K273BX will 60 dBμ overlap with the currently licensed operation of K273BX as required.

Figure 7 is the directional antenna data for the proposed Scala CL-FM-V antenna system proposed to be used.

Figure 8 is a tabulation of the distances to the pertinent contours used for interference calculations for K273BX.

It was found that the new proposed operation of K273BX Pinecliffe, Colorado on channel 276D, will satisfy all of the required commission rules and regulations for an FM translator station.

FIGURE 1, CHANNEL INTERFERENCE STUDY, CHANNEL 276D

K273BX PINECLIFFE, COLORADO

REFERENCE CH# 276D - 103.1 MHz, Pwr= 0.25 kW DA, HAAT= 488.8 M, COR= 3244 M DISPLAY DATES
39 40 31.0 N. Average Protected F(50-50)= 28.61 km DATA 05-05-10
105 29 02.0 W. Standard Directional SEARCH 05-06-10

CH CITY	CALL	TYPE STATE	ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	*IN* (Overlap in km)	*OUT* (Overlap in km)
273D Pinecliffe	K273BX *	LIC	DV_	344.8 164.8	22.3 BLFT20100412AAM	39 52 09.0 105 33 09.0	0.010 0.010	0.0 3343	0.2 Mountain Community Transla	-7.2*<	21.0 *
276C0 Parker	KAVD	CP	_CX	97.5 278.3	115.9 BPH20070314ACY	39 31 57.0 104 08 48.0	100.000 448	187.1 2141	84.2 Coloradio, Inc.	-83.0*<	1.1
275D Wheat Ridge	631520 **	APP	DE_	44.9 225.0	14.2 BNPFT20030312AGW	39 45 57.0 105 21 59.0	0.011 0.011	2.1 2509	3.1 Educational Communications	-9.7*<	-27.5< **
276C1 Limon	KAVD	LIC	NC_	97.6 278.8	160.3 BLH20001129AAZ	39 28 12.0 103 38 14.0	100.000 135	160.3 1791	62.0 Coloradio, Inc.	-11.9<	89.6
278C0 Denver	KRFX ***	LIC	DCX	73.1 253.2	22.2 BLH20070927AIC	39 43 59.0 105 14 10.0	100.000 346	2.3 2256	22.7 Citicasters Licenses, Inc.	12.3	-0.5*< ***
275C1 Laramie	KARS-FM	LIC	_C_	352.4 172.3	134.6 BLH20051031ABO	40 52 37.0 105 41 44.0	100.000 248	88.4 2999	70.8 Regent Trust	15.3	18.3
274D Berthoud	K274BW	LIC	DC_	33.9 214.1	45.2 BLFT20090623ACK	40 00 43.0 105 11 16.0	0.250 0.250	1.1 1673	7.1 Community Radio For	17.8	37.1 North
275C1 Laramie	KARS-FM	CP	_CY	352.4 172.3	134.6 BPH20090122ABT	40 52 37.0 105 41 44.0	72.000 248	83.6 2999	68.3 Regent Trust	20.1	21.2
276C3 Aspen	AL3178	RSV	___	247.1 66.2	126.4 RM9890	39 13 33.0 106 50 00.0	25.000 100	99.8 2991	22.7 20.5	20.5	101.2
274C Manitou Springs	KBIQ	LIC	_C_	152.4 332.8	116.4 BMLH20030423AAT	38 44 43.0 104 51 39.0	72.000 695	15.0 2946	92.7 Bison Media, Inc.	97.9	23.7
276D Silverthorne	649776	APP	_V_	262.4 82.0	50.5 BNPFT20030317IIP	39 36 50.0 106 04 02.0	0.010 0.010	10.2 2853	3.2 Randy M Hudson	31.4	45.1
275D Fort Collins	KARS-FM1	LIC	DC_	11.6 191.8	142.1 BLFTB20070718AEG	40 55 41.0 105 08 36.0	17.000 17.000	76.6 2100	52.5 Regent Trust	33.1	39.5
275D Fort Collins	KARS-FM1	CP	DC_	11.6 191.8	142.1 BPFTB20090122ABX	40 55 41.0 105 08 36.0	11.300 11.300	71.3 2100	48.8 Regent Trust	38.4	43.3
277D Fort Collins	650325	APP	DC_	15.7 195.9	94.4 BNPFT20030317JQN	40 29 36.0 105 10 52.0	0.020 0.020	7.7 2075	4.7 Regent Broadcasting Of Ft.	54.7	41.7
274D Dillon	K274AG	LIC	_CN	262.4 82.0	50.5 BLFT19950814TD	39 36 50.0 106 04 02.0	0.095 -345	0.7 2866	5.6 Nrc Broadcasting Mountain	48.7	44.7
223C1 Broomfield	KWOF	LIC	DEN	46.5 226.9	68.3 BLH20010501AAA	40 05 47.0 104 54 04.0	57.000 377	4.6 1895	1.6 Wilks License Company-denv	22.0R	46.3M
279D Vail	K279BH	LIC	DV_	247.0 66.7	50.9 BLFT20090723AEK	39 29 44.0 106 01 44.0	0.250 0.250	0.5 3221	2.8 Skandia, Llc	49.3	47.9
277D Vail	641630	APP	DV_	267.2 86.6	82.7 BNPFT20030314CKI	39 38 05.0 106 26 47.0	0.100 0.100	22.5 2958	15.3 Cimarron Communications Co	52.4	65.9
277D Vail	634201	APP	_C_	264.3 83.7	75.5 BNPFT20030317DAV	39 36 16.9 106 21 30.6	0.010 0.010	12.7 3425	9.2 Radio Assist Ministry, Inc	53.0	64.7
276D Avon	649786	APP	_V_	265.8 85.1	83.2 BNPFT20030317IIU	39 36 58.0 106 26 59.0	0.010 0.010	10.2 2725	3.2 Randy M Hudson	61.7	77.7
276A Aspen	KSPN-FM	LIC	_C_	247.1 66.2	126.4 BMLH20010913AAJ	39 13 33.0 106 50 00.0	3.000 -26	53.3 2876	13.2 Nrc Broadcasting Mountain	67.0	110.7
273C2 Loveland	KTRR	LIC	NCX	27.6 208.0	121.4 BLH20051107AEI	40 38 31.0 104 49 03.0	17.000 234	5.6 1793	52.6 Regent Trust	88.6	67.8
273C2 Gypsum	KQSE	LIC	_C_	274.0 93.1	113.0 BLH20080222ABW	39 44 18.0 106 47 58.0	0.480 660	1.5 3161	44.3 Wildcat Communications, L.	110.4	68.3
273D Vail	633930	APP	DC_	267.2 86.6	82.7 BNPFT20030313AQS	39 38 05.0 106 26 47.0	0.010 0.010	0.2 2963	7.1 Educational Communications	81.4	75.3
223D Pinecrest	631417	APP	_C_	141.3 321.7	87.7 BNPFT20030310BEU	39 03 31.0 104 50 54.1	0.140 0.140	4.6 2103	1.6 Way-fm Media Group, Inc.	10.0R	77.7M

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR (kW) HAAT (M)	INT (km) COR (M)	PRO (km) LICENSEE	Page # 2 *IN* (Overlap in km)	*OUT*
276D Eagle	649793	APP CO	_V_	268.8 87.9	118.1 BNPFT20030317IJA	39 38 39.0 106 51 35.0	0.010	10.2 2140	4.5 Randy M Hudson	95.0	110.9
277C2 Warren Afb	KRAN	LIC WY	ZCX	21.1 201.6	177.0 BLH20090624AEP	41 09 34.0 104 43 19.0	37.000 78	48.7 1912	33.3 Freisland Broadcasting Cor	96.8	98.6
278D Colorado Springs	629881	APP CO	DE_	152.4 332.8	116.4 BNPFT20030312AJN	38 44 43.0 104 51 39.0	0.010	0.0 2718	3.1 Educational Communications	112.4	113.3
275C3 Battlement Mesa	1347531	RSV CO	___	263.9 82.3	215.0	39 26 33.0 107 58 01.0	25.000 100	87.6 2345	74.5 Cochise Media Licenses, Ll	116.6	144.4
277C1 Colorado City	KJQY	CP CO	_CX	158.3 338.9	225.9 BMPH20080626AAB	37 46 52.0 104 32 03.0	100.000 165	98.7 1958	67.1 Pueblo Broadcasting Group	123.2	151.7
275C3 Battlement Mesa	1347401	APP CO	_CX	263.9 82.3	215.0 BNPH20090929AMO	39 26 33.0 107 58 01.0	25.000 -1	77.4 2244	68.4 Cochise Media Licenses, Ll	126.8	150.4
222C3 Salida	KVRH-FM	LIC CO	_CX	198.9 18.5	143.3 BLH20090917ABD	38 27 11.0 106 01 02.0	0.220 895	4.6 3578	1.6 Three Eagles Communication	12.0R	131.3M
275C3 De Beque	AL6785	VAC CO	___	263.0 81.2	242.3 RM10736	39 22 36.0 108 16 33.0	25.000 100	82.8 1965	62.2 Garfield-mesa County Line	150.5	178.8
275C3 De Beque	R13387	DEL CO	___	263.0 81.2	242.3	39 22 36.0 108 16 33.0	25.000 100	82.8 1965	62.2 Cochise Media Licenses, Ll	150.5	178.8
222C2 Hugo	KHIH	CP CO	NHX	111.6 292.7	168.2 BNPH20070502AFN	39 06 20.0 103 40 30.0	26.000 82	4.6 1747	1.6 Kona Coast Radio, Llc.	15.0R	153.2M
278C3 Center	KPAU	RSV CO	___	198.5 18.0	212.5	37 51 28.0 106 15 10.0	25.000 100	6.1 2596	50.9 Cochise Media Licenses Llc	203.1	161.6
222C2 Hugo	KHIH	APP CO	_CX	111.2 292.5	186.0 BMPH20100128AIG	39 03 15.0 103 28 48.0	40.000 52	4.6 1622	1.6 Kona Coast Radio, Llc.	15.0R	171.0M
222A Hugo	AU7055920	VAC CO	___	108.5 289.7	183.5 RM10096	39 08 10.0 103 28 10.0	6.000 100	4.6 1686	1.6 Alan Olson	10.0R	173.5M
222A Hillsdale	KYOY	APP WY	ZCX	25.9 206.5	184.6 BPH20100301ADY	41 09 58.0 104 31 16.0	6.000 100	4.6 1846	1.6 Kimball Radio, Llc	10.0R	174.6M

Terrain database is USGS 03 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
In & Out distances between contours are shown at closest points. Reference zone = 2, Co to 3rd adjacent.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
***affixed to 'IN' or 'OUT' values = site inside protected contour.

* TRANSLATOR BEING MODIFIED BY THIS APPLICATION

** THIS APPLICATION AT WHEAT RIDGE, CO HAS BEEN DISMISSED BY THE APPLICANT. SEE TECHNICAL STATEMENT
FOR FURTHER DETAILS

*** WHILE THERE IS SOME PROPOSED OVERLAP WITH KRFX, NO ACTUAL INTEFERENCE WILL BE CAUSED WITH KRFX
SINCE THERE IS NO POPULATION RESIDING INSIDE THE PROPOSED 100 DBU INTERFERENCE CONTOUR. SEE THE
ATTACHED TECHNICAL STATEMENT FOR FURTHER DETAILS.

FIGURE 2, KRFX 60.4 DBU CONTOUR AT PROPOSED SITE
K273BX PINECLIFFE, COLORADO

Coverage Study - USGS 03 SEC
05-06-2010

KRFX CH278 C0, 100.0 kW, 346.0M HAAT, 2256.0M COR AMSL
Service Contour = 60.4 dBu. Population = 11,937

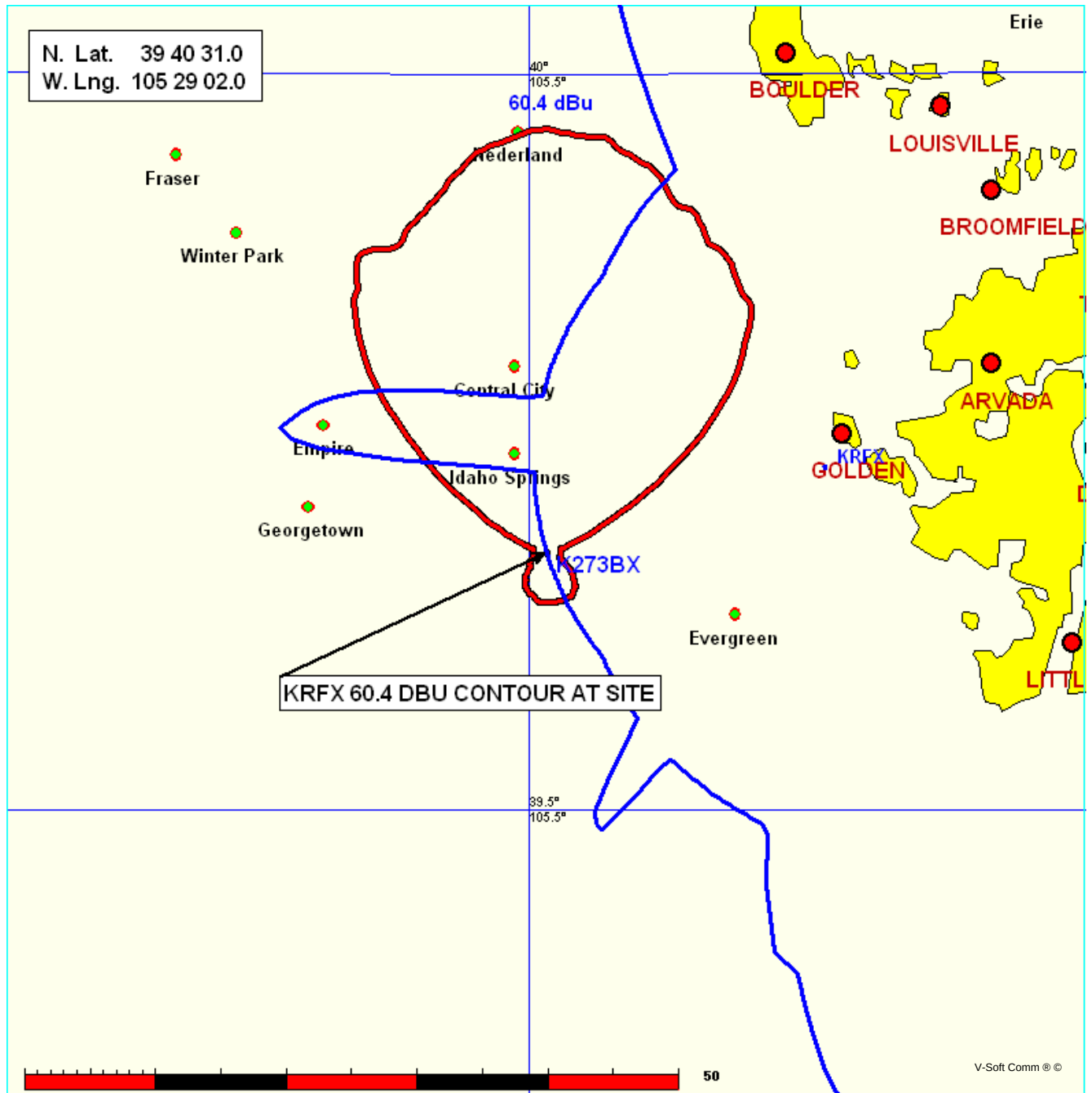


FIGURE 3, PREDICTED 100 DBU SHOWING NO POPULATION
K273BX PINECLIFFE, COLORADO

Coverage Study - USGS 03 SEC
05-06-2010

K273BX CH276 D , 0.25 kW, 488.8M HAAT, 3244.0M COR AMSL
Interference Service Contour = 100 dBu. Population = 0

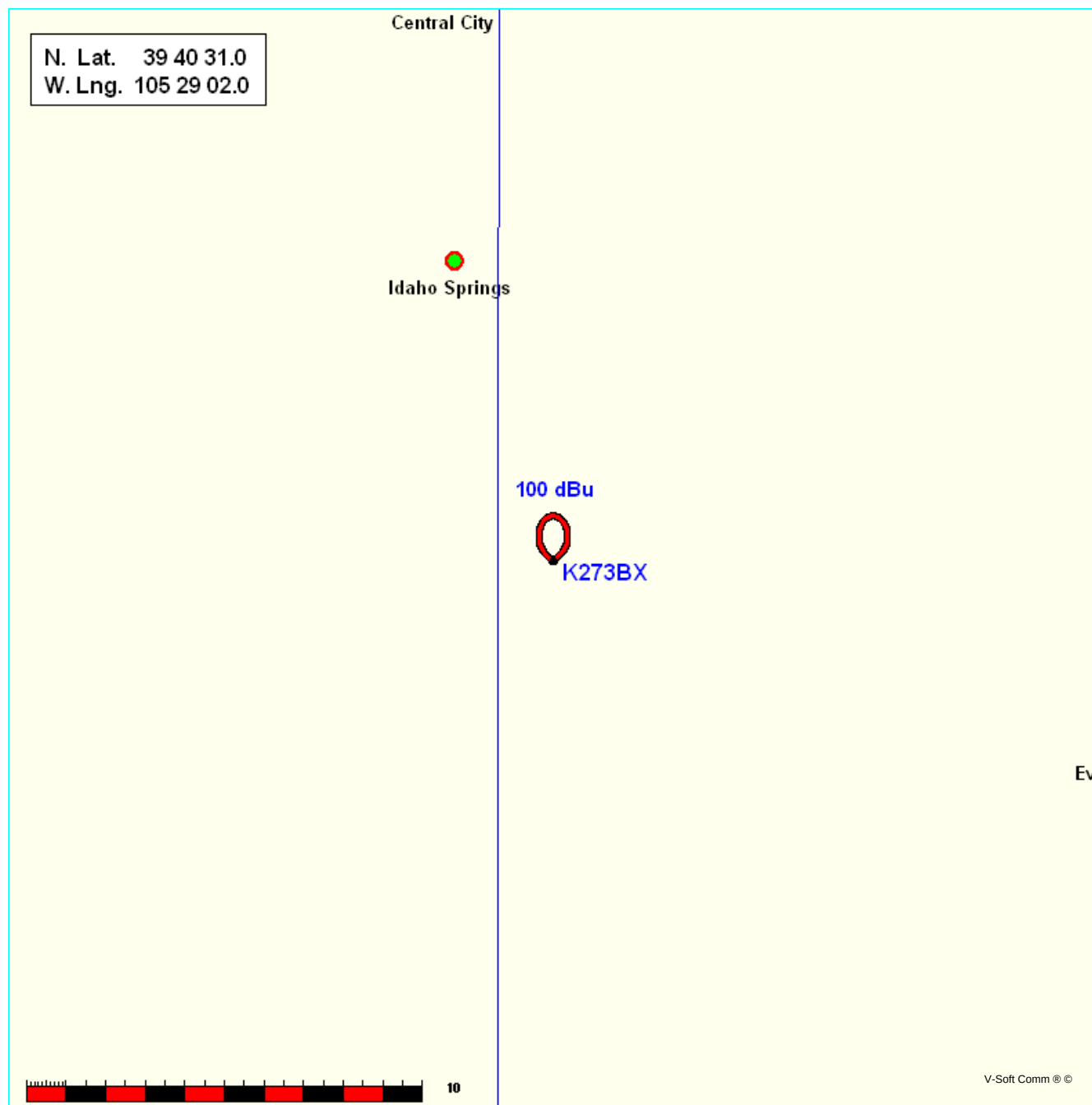


FIGURE 4, DETAILED INTERFERENCE STUDY WITH KAVD(CP)
K273BX PINECLIFFE, COLORADO

FMCommander Single Allocation Study - 05-06-2010 - USGS 03 SEC
K273BX's Overlaps (In= -71.38 km, Out= 24.24 km)

K273BX CH 276 D DA
Lat= 39 40 31.0, Lng= 105 29 02.0
0.25 kW 488.8 M HAAT, 3244 M COR
Prot.= 60 dBu, Intef.= 40 dBu

KAVD-C CH 276 C0 BPH20070314ACY
Lat= 39 31 57.0, Lng= 104 08 48.0
100.0 kW 448 M HAAT, 2141 M COR
Prot.= 60 dBu, Intef.= 40 dBu

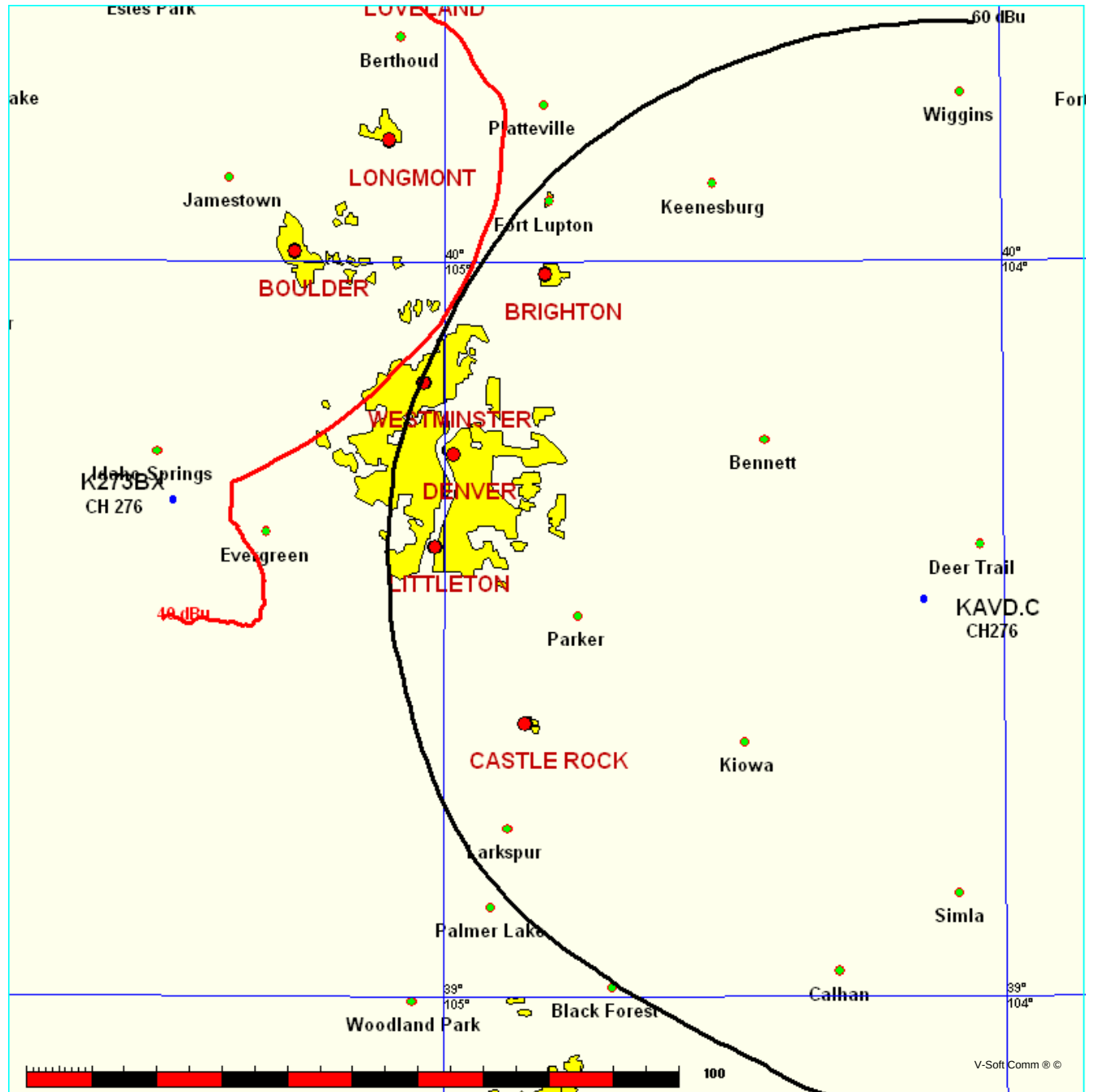


FIGURE 5, MAP SHOWING 60 DBU FOR KLDV AND PROP. K273BX
K273BX PINECLIFFE, COLORADO

Coverage Study - USGS 03 SEC
05-06-2010

K273BX CH216 D , 0.25 kW, 488.8M HAAT, 3244.0M COR AMSL
Service Contour = 60 dBu. Population = 2,579,498

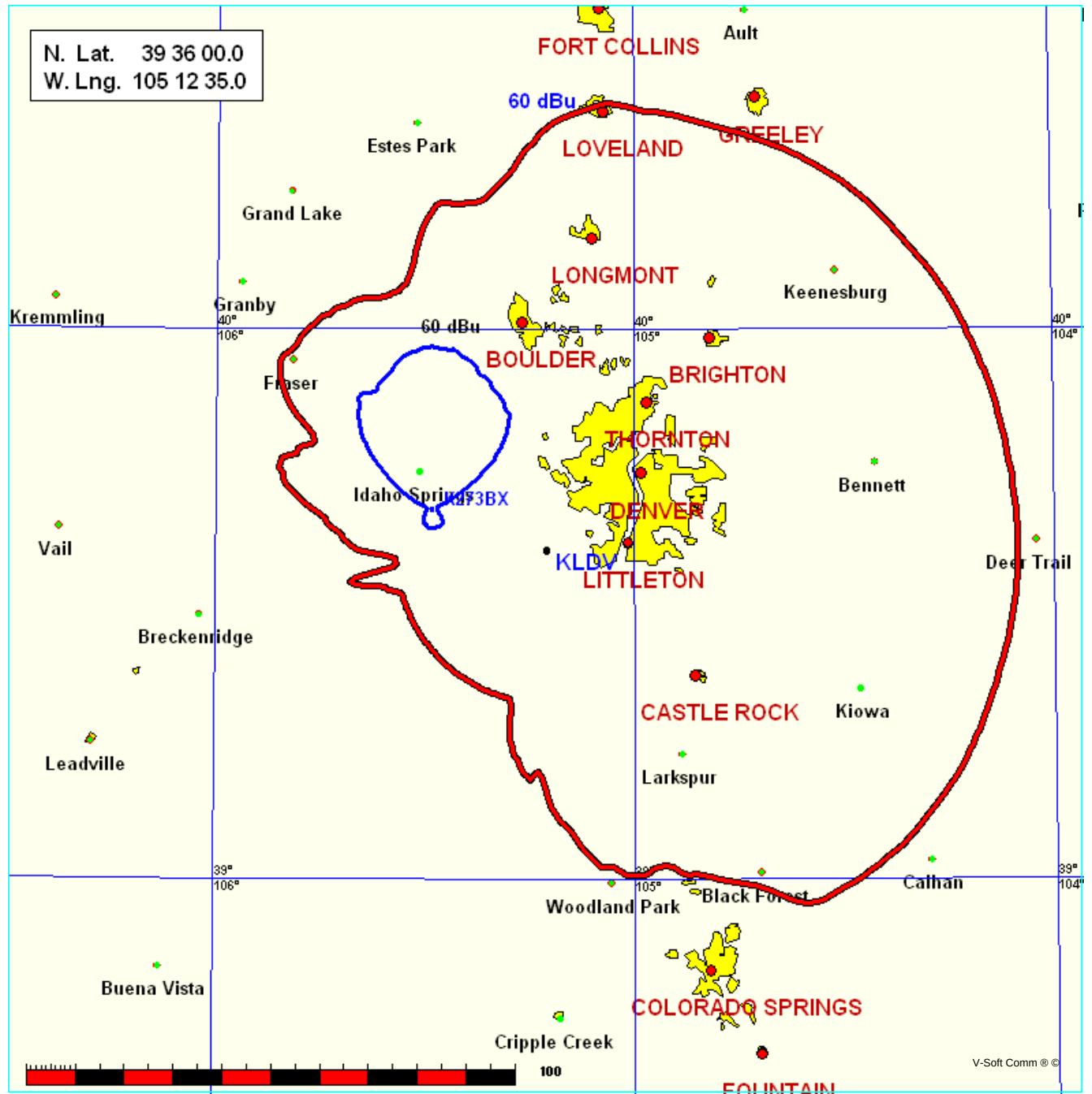


FIGURE 6, OVERLAP WITH CURRENT K273BX
K273BX PINECLIFFE, COLORADO

Coverage Study - USGS 03 SEC
05-06-2010

K273BX CH276 D , 0.25 kW, 488.8M HAAT, 3244.0M COR AMSL
Service Contour = 60 dBu. Population = 2,512

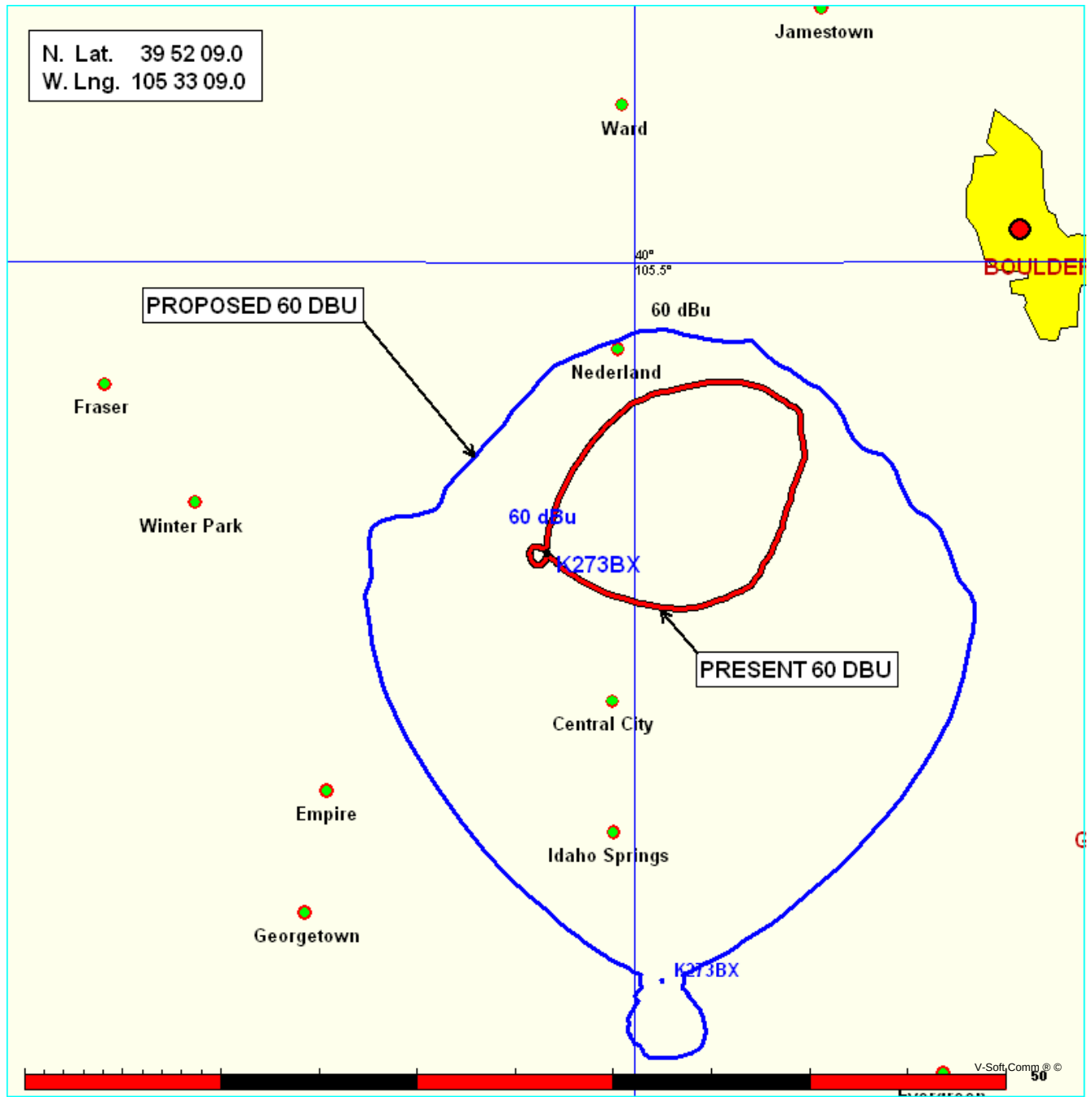


FIGURE 7 - DIRECTIONAL ANTENNA DATA

K273BX PINECLIFFE, CO

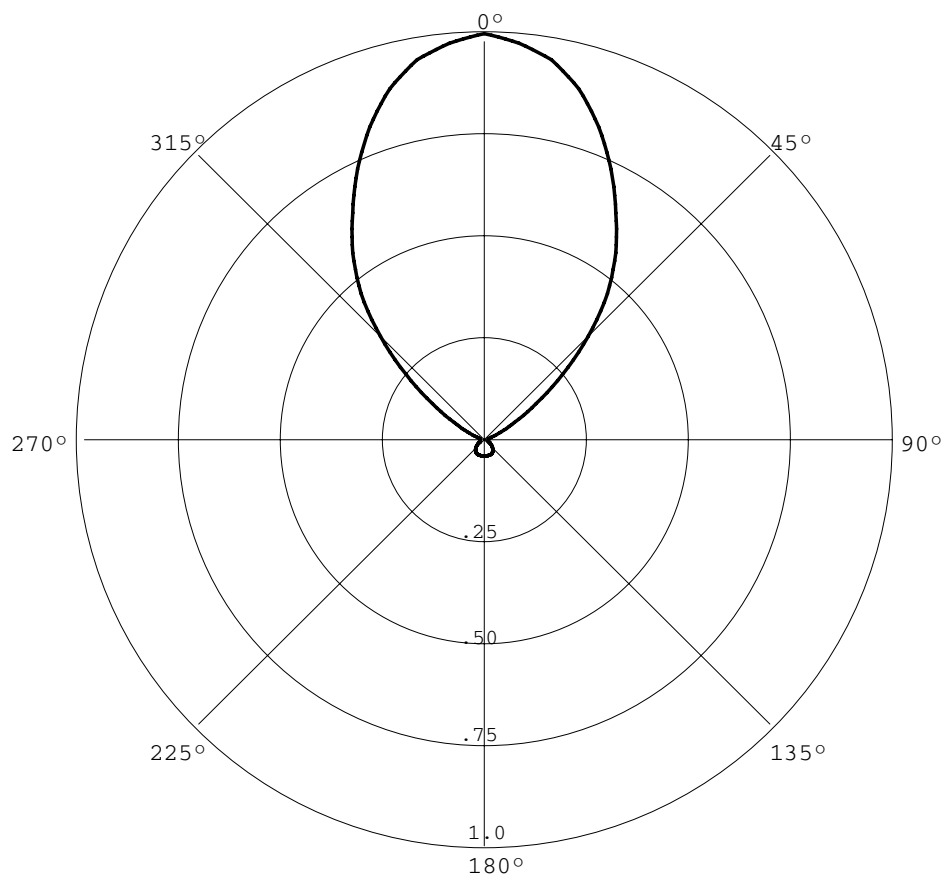
05-06-2010

RMS(V) = .393

SCALA-CL-FMV

Graph is Relative Field

Azi	Field	dBk	kW
000	1.000	-06.021	0.250
010	0.950	-06.466	0.226
020	0.820	-07.744	0.168
030	0.645	-09.829	0.104
040	0.470	-12.579	0.055
050	0.250	-18.062	0.016
060	0.085	-27.432	0.002
070	0.020	-40.000	0.000
080	0.010	-46.021	0.000
090	0.010	-46.021	0.000
100	0.010	-46.021	0.000
110	0.010	-46.021	0.000
120	0.015	-42.499	0.000
130	0.025	-38.062	0.000
140	0.034	-35.391	0.000
150	0.038	-34.425	0.000
160	0.040	-33.979	0.000
170	0.040	-33.979	0.000
180	0.040	-33.979	0.000
190	0.040	-33.979	0.000
200	0.040	-33.979	0.000
210	0.038	-34.425	0.000
220	0.034	-35.391	0.000
230	0.025	-38.062	0.000
240	0.015	-42.499	0.000
250	0.010	-46.021	0.000
260	0.010	-46.021	0.000
270	0.010	-46.021	0.000
280	0.010	-46.021	0.000
290	0.020	-40.000	0.000
300	0.085	-27.432	0.002
310	0.250	-18.062	0.016
320	0.470	-12.579	0.055
330	0.645	-09.829	0.104
340	0.820	-07.744	0.168
350	0.950	-06.466	0.226



Contour.out

N. Lat. = 394031.0 W. Lng. = 1052902.0
 HAAT and Distance to Contour,
 FCC, FM 2-10 Mi, 51 pts Method - USGS 03 SEC

FIGURE 8, TABULATION OF DISTANCE TO CONTOURS, K273BX

Azi.	AV EL	HAAT	dBk	60-F5	40-F1	100-F1
000	2625.1	618.9	-6.02	32.82	93.61	1.11
010	2628.3	615.7	-6.47	31.84	91.97	1.05
020	2655.5	588.5	-7.74	28.89	86.34	0.91
030	2597.8	646.2	-9.83	26.99	82.88	0.72
040	2500.9	743.1	-12.58	24.83	78.63	0.52
050	2467.7	776.3	-18.06	17.97	62.23	0.28
060	2365.2	878.8	-27.43	8.13	39.91	0.09
070	2409.6	834.4	-40.00	2.18	16.63	0.02
080	2487.3	756.7	-46.02	1.11	9.03	0.01
090	2518.4	725.6	-46.02	1.11	8.94	0.01
100	2509.1	734.9	-46.02	1.11	8.97	0.01
110	2379.3	864.7	-46.02	1.11	9.30	0.01
120	2449.0	795.0	-42.50	1.61	12.58	0.02
130	2527.9	716.1	-38.06	2.66	17.98	0.03
140	2541.8	702.2	-35.39	3.51	21.50	0.04
150	2585.5	658.5	-34.42	3.87	22.09	0.04
160	2725.5	518.5	-33.98	3.96	19.64	0.04
170	2775.1	468.9	-33.98	3.94	18.71	0.04
180	2822.0	422.0	-33.98	3.87	17.56	0.04
190	2811.5	432.5	-33.98	3.90	17.86	0.04
200	2977.7	266.3	-33.98	3.44	13.38	0.04
210	3027.0	217.0	-34.42	3.17	11.82	0.04
220	3079.7	164.3	-35.39	2.67	9.78	0.04
230	3265.9	-21.9	-38.06	1.61	3.51	0.03
240	3384.2	-140.2	-42.50	1.61	2.76	0.02
250	3327.6	-83.6	-46.02	1.11	2.28	0.01
260	3232.9	11.1	-46.02	1.11	2.28	0.01
270	3175.9	68.1	-46.02	1.11	3.37	0.01
280	3047.7	196.3	-46.02	1.11	5.60	0.01
290	2959.0	285.0	-40.00	2.00	9.88	0.02
300	2920.4	323.6	-27.43	6.26	22.77	0.09
310	2700.6	543.4	-18.06	14.83	53.28	0.28
320	2600.0	644.0	-12.58	23.17	74.03	0.52
330	2599.3	644.7	-9.83	26.96	82.80	0.72
340	2689.5	554.5	-7.74	28.00	84.12	0.91
350	2640.6	603.4	-6.47	31.50	91.31	1.05

Ave El= 2750.30 M HAAT= 493.70 M AMSL= 3244

EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.

1665 Briargate Blvd., Suite 100
Colorado Springs, Colorado 80920
Telephone (719) 593-0600

FILED/ACCEPTED

JAN 12 2010

Federal Communications Commission
Office of the Secretary

December 22, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E., Suite 110
Washington, DC 20002

--BY HAND--

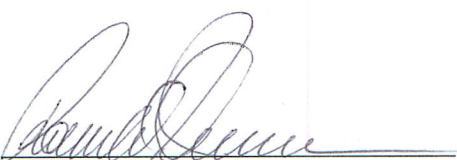
Re: Educational Communications of Colorado Springs, Inc.
Wheat Ridge, CO (Facility ID No. 140236)
File No. BNPFT-20030312AGW

Dear Ms. Dortch:

Educational Communications of Colorado Springs, Inc., respectfully requests its pending application for a new translator on Channel 275 at Wheat Ridge, Colorado (File No. BNPFT-20030312AGW), be dismissed. Attached is a Declaration certifying that Educational Communications of Colorado Springs, Inc. has not been promised nor received any consideration.

Respectfully submitted,

**EDUCATIONAL COMMUNICATIONS
OF COLORADO SPRINGS, INC.**

By: 

Dr. Ronald A. Johnson
Chairman

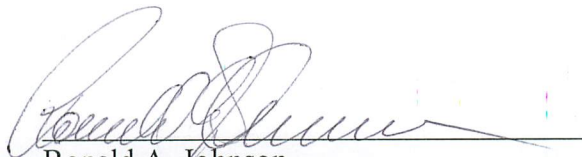
DECLARATION

I, Ronald A. Johnson, under penalty of perjury and pursuant to Section 1.16 of the Commission's Rules, 47 C.F.R. § 1.16, do hereby declare to the best of my knowledge and belief, that:

1. I am Chairman of Educational Communications of Colorado Springs, Inc. ("Applicant"), an applicant for a construction permit for a new translator on Channel 275 at Wheat Ridge, Colorado (File No. BNPFT-20030312AGW, Facility ID No. 140236) (the "Application").

2. Neither Applicant nor its principals have received or been promised, either directly or indirectly, any money or other consideration for dismissal of the Application.

Executed this 22nd day of December, 2009.

A handwritten signature in black ink, appearing to read 'Ronald A. Johnson', is written over a horizontal line.

Ronald A. Johnson
Chairman