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Before the

Federal Communications Commission  
Office of the Secretary

**Federal Communications Commission**

Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Sec. 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Americus, Georgia) )

RM-

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULE MAKING**  
**AND**  
**MODIFICATION OF LICENSE**

Sumter Broadcasting Co., Inc., licensee of Station WPUR(FM), Americus, Georgia, by its counsel, pursuant to Sections 1.401 and 1.420(g) of the Commission's Rules, respectfully requests issuance of a notice of proposed rule making proposing the following actions:

(1) Change in the FM channel assignments at Americus, Georgia, as follows:

	<u>Present</u>	<u>Proposed</u>
Americus, GA	234C3, 254A <sup>1</sup>	234C3, 254C3

<sup>1</sup> Channel No. 234C3 was assigned to Americus by the Report and Order in MM Docket No. 90-212, released October 18, 1990 (DA 90-1338), which simultaneously modified the license of Station WDEC(FM), Americus, to specify operation on that channel. Channel No. 254A was assigned to Americus by the Report and Order in MM Docket No. 90-325, (continued)

(2) Modification of the license of Station WPUR, Americus, Georgia, to specify operation on Channel No. 254C3.

In support whereof, Sumter Broadcasting Co., Inc., states as follows:

1. As set forth in the attached Technical Exhibit, Channel No. 254C3 may be assigned to Americus, Georgia, consistent with all separation requirements. Further, it can be utilized at the present antenna site of Station WPUR and meet all separation requirements.

2. Channel No. 254C3 is co-channel to the channel on which Station WPUR presently is authorized to operate, Channel No. 254A. Accordingly, pursuant to Section 1.420(g) of the Rules, the license of Station WPUR may be modified in the rule making proceeding here requested to specify operation on Channel No. 254C3.

3. The changes proposed would materially contribute to the efficient utilization of the FM frequency spectrum by providing expanded coverage and utilization of Channel No. 254 at Americus.

4. Upon assignment of Channel No. 254C3 to Americus, Georgia, and modification of the license of Station WPUR to specify operation on that channel, Sumter Broadcasting Co., Inc., will promptly file an application for construction permit for operation of Station WPUR on that channel.

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(Footnote 1, continued) released February 15, 1991 (DA 91-159), which simultaneously modified the license of Station WPUR(FM), Americus, to specify operation on that channel.

**WHEREFORE**, it is respectfully submitted that good cause has been shown for issuance of a notice of proposed rule making for (1) assignment of FM Channel No. 254C3 to Americus, Georgia, and (2) modification of the license of Station WPUR(FM), Americus, Georgia, to specify operation on that channel.

Respectfully submitted,

**SUMTER BROADCASTING CO., INC.<sup>2</sup>**

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Roy F. Perkins, Jr.

1724 Whitewood Lane  
Herndon, Virginia 22070  
(703) 435-9700  
Its Attorney

April 24, 1991

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<sup>2</sup> P. O. Box 727  
Americus, GA 31709

SUMTER BROADCASTING CO., INC.  
PETITION FOR RULE MAKING  
TO SUBSTITUTE 254C3 FOR 254A  
AMERICUS, GEORGIA  
March 1991

Technical Exhibit  
TE-1

Bromo Communications, Inc.  
P.O. Box M - 1331 Ocean Boulevard, Suite 201  
St. Simons Island, Georgia 31522  
(912) 638-5608

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SUMTER BROADCASTING CO., INC.  
PETITION FOR RULE MAKING  
TO SUBSTITUTE 254C3 FOR 254A  
AMERICUS, GEORGIA  
March 1991

TECHNICAL STATEMENT

1. This Technical Exhibit supports the request of Sumter Broadcasting Co., Inc. ("Sumter"), licensee of WPUR (FM) Radio Station, to change the FM Table of Allotments (§73.202(b) of the Commission's Rules) by substituting Channel 254C3 for 254A. Through MM Docket No. 90-325 Sumter was ordered from 249A to 254A. The effective date of that order was April 1, 1991.

2. No change of sites is necessary to effectuate the C3 upgrade. The present Sumter site of North Latitude 32 04 51 and West Longitude 84 15 20 will serve as the C3 reference site as indicated by the Allocation Study in Exhibit #1. At the reference all known allocation constraints are met. No other substitutions are required.

3. From the C3 reference site, the 3.16 mV/m contour will serve all of Americus, the city of license. If ordered to 254C3, Sumter will timely file a Form 301 application.

BROMO COMMUNICATIONS INC.  
Broadcast Technical Consultants

WPUR Radio Station  
Searching at Present Site

REFERENCE 32 04 51 N CLASS C3 DISPLAY DATES DATA 02-28-91  
84 15 20 W Current rules spacings SEARCH 03-26-91  
----- CHANNEL 254 - 98.7 MHz -----

CALL TYPE	CH# LAT	CITY LNB	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
ALOPEN AL N	254A 32 04 51	Americus 84 15 20 90-325	GA 0.000 kW	0.0 0M	0.00 0.0	142.0 88.3	-142.00 *
WFAV LI CN	252A 31 57 26	Cordele 83 46 08 Silver Star Comms-Albany, Inc	GA 3.000 kW	106.6 91M	47.98 29.8	42.0 26.1	5.98
ALOPEN AL N	257C2 31 54 30	Lumpkin 84 54 38 88-499	GA 0.000 kW	252.8 0M	64.79 40.3	56.0 34.8	8.79 891214
>Site Restricted-Effective 11-13-89							
WSBFM LI CN	253C 33 45 35	Atlanta 84 20 07 WSB, Inc.	GA 100.000 kW	357.7 311M	186.34 115.8	176.0 109.4	10.34
WBAMFM LI CN	255C 32 24 11	Montgomery 86 11 48 Deep South Broadcasting Compa	AL 100.000 kW	281.1 334M	186.40 115.8	176.0 109.4	10.40
WBGFMF AP CN	255C1 30 40 13	Tallahassee 83 56 26 HVS Partners	FL 17.500 kW	169.2 568M	159.24 99.0	144.0 89.5	15.24

ALLOCATION STUDY

EXHIBIT #1  
SUMTER BCSTG. CO., INC.  
REQUESTED RULE MAKING  
TO SUBSTITUTE 254C3 FOR 254A  
AMERICUS, GEORGIA

MARCH 1991

**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS  
St Simons Island, Georgia Washington, D.C.



AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia        )  
St. Simons Island     )  
County of Glynn        )                    ss:

CLIFTON G. MOOR being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Sumter Broadcasting Co., Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in broadcast engineering since 1966.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 27th of March, 1991.

*Clifton G. Moor*  
\_\_\_\_\_  
CLIFTON G. MOOR  
Affiant

Sworn to and subscribed before me this the 27th day of March, 1991.

*Judy C. Paser*  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: July 20, 1991

