

ORIGINAL

RECEIVED

JAN - 8 1992

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

Federal Communications Commission
Office of the Secretary

Washington, DC 20554

RECEIVED

JAN 8 1992

In the Matter of)
)
 Amendment of Section 73.202(b)) RM- _____
 Table of Allocations)
 FM Broadcast Stations) MM Docket No. - _____
 London, Hyden, and Hazard, Kentucky)
)
 To: The Chief, Mass Media Bureau

PETITION FOR RULEMAKING AND RELATED ORDERS

Comes Now Ethel Huff ("Huff"), permittee of FM radio station WYGE, Channel 223A, London, Kentucky, and by her undersigned counsel and pursuant to Section 1.401(a) of the Commissions Rules, petitions the Commission to institute a rule-making proceeding to amend section 73.202(b) of said Rules in the following respects:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
London, KY	<u>223A</u> , 280A	<u>222C3</u> , 280A
Hyden, KY	<u>222A</u>	<u>284A</u>
Hazard, KY	266C, <u>284A</u>	266C, <u>223A</u>

Channel 222A at Hyden is assigned to station WZQQ; and channel 284A at Hazard is assigned to station WJMD. The primary purpose of

No. of Copies rec'd 14
List A B C D E
8010

the instant request is to permit the upgrade of petitioner's station WYGE to a class C3 facility. As seen from the attached technical report, the substitution of channels at Hyden is necessary in order to make channel 222 available at London; and the change in the allocation at Hazard is necessary in order to make the substitute channel available at Hyden. However, the channels proposed for Hyden and Hazard can be used by WZQQ and WJMD, respectively, at their present sites; and in each instance 6 kw operation will be possible on the substitute channel.

No changes are involved for any other channels; and, as demonstrated in the attached Technical Report, all proposed changes will comply with all requirements of the Commission's Rules.

As also noted in the Technical Report, the spacing parameters involved in the WYGE upgrade are such that third party expressions of interest will not be permitted.

Petitioner also requests that the Commission issue show cause orders to WYGE, WZQQ and WJMD modifying their authorizations to Channels 222C3, Channel 284A and 223A, respectively. Petitioner understands that WZQQ is desirous of operating at 6 kw and suggests that that change be incorporated into the show cause order as well.

The above changes are clearly in the public interest. The upgrade of WYGE from a Class A to a Class C3 facility will provide London, Kentucky with its first area-wide service and permit WYGE to serve an

additional 70,000 persons, an increase of 155%. The availability of 6 kw operation for WJQQ and WJMD (which is not possible for either station with its present assignment) will further the Commission's policies for improving the service of Class A stations.

Petitioner agrees to be responsible for all costs which Commission policy requires it to bear in connection with the facility change requested for WJMD. It has a prior agreement with the WZQQ licensee relative to the costs of changing the facilities of that station but would be willing to bear those required costs as well if that agreement is not implemented.

WHEREFORE Petitioner prays that Section 73.202(b) of the Commission's Rules be amended and Show Cause Orders be issued as requested above.

Respectfully submitted

January 7, 1992



William P. Bernton
2 Mill Lane
Yarmouth Port, MA 02675
(508) 362-4358

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 1992, copies of the foregoing petition were deposited in the U.S. mails, first class postage prepaid, addressed to:

Joey L. Dick
P.O. Box 181
Stinnett, KY 40868
Licensee of WZQQ

and to

Hazard Broadcasting Services
P.O. Box 7001
Hazard, KY 41701
Licensee of WJMD



William P. Bernton

TECHNICAL REPORT

ETHEL HUFF

Requests:

ADJACENT CHANNEL UPGRADE FOR WYGE
ON CHANNEL 222C3 (92.3 MHZ)

LONDON, KENTUCKY

January 1, 1992

CHARLES M. ANDERSON

BROADCAST CONSULTANT

1519 EUCLID AVENUE

BOWLING GREEN, KENTUCKY 42103

TECHNICAL REPORT

This technical report has been prepared on behalf of Ethel Huff, permittee of a new FM station on channel 223A at London, Kentucky, in support of a petition for rulemaking requesting an upgrade from CHANNEL 223A to 222C3.

I. PROPOSED UPGRADE AND SUBSTITUTIONS

The upgrade of the London 223A facility to 222C3 is possible with substitutions at Hazard, KY (223A for WJMD's 284A), and at Hyden, KY (284A for WZQQ's 222A). The substitution of channels at the licensed sites of two operating stations in order to effect an upgrade in class for an existing allocation is permitted by the Commission's allocations rules and policies. In each case the substitution is at the existing station's licensed site. Furthermore, the substitutions facilitate full 6 kw/ 100 meter class A facilities. Both WJMD and WZQQ are presently limited to 3 kw/ 100 meter operation by shortspacings.

II. WYGE 222C3 ADJACENT CHANNEL UPGRADE

Upgrade of the WYGE facility is proposed at reference point:

N 37-03-32 W 84-10-02 (10.7 km southeast - 1300 FT AMSL).

An allocation study is submitted as Exhibit E-1 which

demonstrates that the 222C3 facility meets all required clearances at the reference point with the exception of the licensed WZQQ operation for which a substitution is proposed.

Exhibit E-6 demonstrates that there is considerable area within which a London 222C3 facility may be located meeting required separations. The two most relevant separations are plotted on the exhibit.

The upgrade of WYGE to 222C3 qualifies as an adjacent channel upgrade because it is entirely mutually exclusive with the existing authorized facility. The 89 km spacing required between proposed class C3 and the authorized WYGE facility on 223A can not be obtained. Therefore, the new higher class channel will not be subject to competing expressions of interest.

III. REQUIRED COVERAGE OF LONDON, KY FROM 222C3

Exhibit E-5 demonstrates that the 222C3 allocation operating as a maximum facility (25 kw/ 100 meters HAAT) will more than provide a 70 dBu contour over the entire community of London, KY. Furthermore, a detailed terrain analysis has been performed between the arbitrary reference point and the London, KY reference point (County Courthouse at the geographic center of the community -- N 37-07-43 W 84-05-00 - 1240 FT AMSL) to establish compliance with Section 73.315.

Terrain data was obtained at .1 mile intervals from

U.S.G.S. 7.5 minute topographic maps along the 44 degree True radial. The data is plotted on graph paper which provides for the earth's curvature and is included as Exhibit E-4. From a radiation center of 1800 feet (549 meters) AMSL at the arbitrary reference point (based on 183 meter tower) line of sight is easily obtained to the city.

IV. WZQQ 284A SUBSTITUTION

The substitution of 284A for WZQQ's operation on channel 222A is proposed at the station's licensed site (BLH-881121KB) at:

N 37-10-14 W 83-22-49.

Clearly the substituted channel will provide city grade coverage from the station's licensed site. Furthermore, WZQQ will be able to obtain full 6 kw/ 100 meter operation which is presently precluded by a shortspacing providing an additional public interest benefit.

An allocation study is provided as Exhibit E-2 demonstrating that required clearances are obtained. Note that the simultaneous substitution of 223A for 284A at Hazard, KY eliminates the only obstacle to the substitution.

V. WJMD 223A SUBSTITUTION

The substitution of 223A for WJMD's (Hazard, KY) operation on channel 284A is proposed at the station's

licensed site (BLH-890807KB) at coordinates:

N 37-11-36 W 83-11-04.

The substituted channel will provide city grade coverage from the station's licensed site. Furthermore, WJMD will be able to obtain full 6 kw/ 100 meter operation which is presently precluded by a shortspacing providing an additional public interest benefit.

An allocation study is provided as Exhibit E-3 demonstrating that required clearances are obtained. Note that the simultaneous substitution of 284A for 222A at Hyden, KY eliminates the only obstacle to the substitution.

IV. AREA AND POPULATION GAINS

An analysis of the area and population which would be served by the 222C3 upgrade has been conducted by superimposing the maximum facility (25 kw/ 100 meters HAAT) C3 60 dBu contour (39.1 km radius) on the U.S. Census Map of Counties, County Subdivisions, and Places. Uniform distribution of population was assumed. Where the contour bisected a subdivision, proportional population was determined. The upgraded population was compared to the area and population from the original application for the authorized WYGE facility.

A total population of 115,063 was determined within the proposed C3 60 dBu and a service area of 4,803 square kilometers based on numerical integration. The proposed upgrade will serve an additional area of 2,929 sq km in area

(+164%). The gain in population will be 70,025 (+155%).

III. CONCLUSION

The upgrade of WYGE to 222C3 will provide London, Kentucky with its first wide area FM service, and effect an increase in population served of 70,025 (+155%). Furthermore, the proposed modification of Hyden station WZQQ and Hazard station WMJD will substantially increase each station's service area as a result of the capability of employing full class A 6 kw/ 100 meters facility.

It is concluded that the upgrade of the authorized facility on 223A at London, KY to 222C3 can be accomplished with substitutions at Hyden and Hazard, KY.

Clearly the requested upgrade is mutually exclusive with the existing authorized facility spaced at a distance of 9.69 km compared to the required 89 km for adjacent channel class A to C3 facilities. Further, the spacing cannot be significantly increased without loss of city-grade coverage to London. Therefore, the 222C3 upgrade meets the Commission's requirements for cochannel and adjacent channel upgrades.

SUMMARY OF ALLOCATION PROPOSALS

City	Present	Proposed	Coordinates
London, Ky	223A, 280A	222C3, 280A	N 37-03-32 W 84-10-02 (10.7 km @ 224 Deg)
Hyden, KY	222A	284A	N 37-10-14 W 83-22-49 BLH-881121KB licensed site.
Hazard, KY	266C, 284A	266C, 223A	N 37-11-36 W 83-11-04 BLH-890807KB licensed site.

EXHIBIT E-1

FM Spacing study

Title: LONDON, KY - WYGE
 Channel 222C3 (92.3 MHz)
 Database: DW 12/17/91

Latitude: 37-03-32
 Longitude: 84-10-02
 Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WOAL-FM LIC	ALICE LLOYD COLLEGE	*219A	.90	37-19-45	74.9	118.6	42	
PIPPA PASSES	KY BLED-870105KA	91.7	162	82-52-30	255.7	76.59	CLEAR	
WUOT LIC	UNIVERSITY OF TENNESSEE	*220C	100	36-00-19	170.1	118.7	96	
KNOXVILLE	TN BLED-890201KB	91.9	482BT	83-56-23	350.2	22.68	CLEAR	
WZQQ LIC	JOEY L DICK	222A	2.42	37-10-14	79.7	71.03	142	
HYDEN	KY BLH-881121KB	92.3	111	83-22-49	260.1	-71.0	SHORT	
WSAC CP	LOUISA COMMUNICATIONS IN	222A	4.48	38-10-33	47.0	184.0	142	
LOUISA	KY BMPH-901121IE	92.3	115	82-37-39	228.0	41.98	CLEAR	
CP Granted 03/26/91 per FCC release #21085 dated 04/02/91;								
WDEF-FM LIC	ROY H PARK BCG OF TENN I	222C	100	35-08-06	206.2	237.5	237	
CHATTANOOGA	TN BLH-800128AD	92.3	360	85-19-25	25.6	.517	CLOSE	
WYGE CP	ETHEL HUFF	223A	3	37-08-40	11.6	9.695	89	
LONDON	KY BPH-880817MH	92.5	100	84-08-43	191.6	-79.3	SHORT	
CP Granted 12/20/90 per FCC release #21017 dated 12/26/90; Call Granted 02/22/91 per FCC release #152 dated 02/22/91								
WMIK-FM LIC	CUMBERLAND GAP BROADCAST	224A	.13	36-35-50	147.2	60.96	42	
MIDDLESBORO	KY BLH-791220AP	92.7	439	83-47-49	327.4	18.96	CLEAR	
WVLK-FM LIC	WVLK RADIO INCORPORATED	225C1	100	38-02-22	349.3	110.8	76	
LEXINGTON	KY BLH-6828	92.9	259	84-24-11	169.1	34.81	CLEAR	
WXJJ CP	WILLIAM S. DAUGHERTY III	275A	2.50	37-21-32	322.1	42.30	12	
MOUNT VERNON	KY BPH-860703MF	102.9	106	84-27-40	141.9	30.30	CLEAR	
CP Granted 04/30/90 per FCC release #20855 dated 05/11/90;								
WXJJ APP	WILLIAM S. DAUGHERTY III	275A	3	37-23-29	327.5	43.83	12	
MOUNT VERNON	KY BMPH-910606IC	102.9	100	84-26-01	147.4	31.83	CLEAR	
Received per FCC release #15018 dated 06/19/91, accepted per 15021 dated 06/24/91;								
WWXL-FM LIC	WILDERNESS HILLS INCORPO	276A	2.85	37-09-14	73.0	36.40	12	
MANCHESTER	KY BLH-6031	103.1	94	83-46-31	253.2	24.40	CLEAR	
WWXL-FM CP	WILDERNESS HILLS INCORPO	276A	2.64	37-09-13	73.1	36.51	12	
MANCHESTER	KY BPH-881206IE	103.1	103	83-46-26	253.3	24.51	CLEAR	
CP Granted 04/03/89; Affiliated with WWXL(AM)								

>> End of channel 222C3 study <<

EXHIBIT E-2

FM Spacing study

Title: WZQQ SUBSTITUTION
 Channel 284A (104.7 MHz)
 Database: DW 12/17/91

Latitude: 37-10-14
 Longitude: 83-22-49
 Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

WUDJ	CP	LENN R PRUITT	230C2	50	37-09-15	269.2	95.90	15
BURNSIDE		KY BPH-890713IC	93.9	150	84-27-35	88.6	80.90	CLEAR

ORDERED FROM 230A; Network: SMN;
 CP Granted 01/08/90 per FCC release #20766 dated 01/12/90

WFSM	LIC	WFSM INCORPORATED	231A	1.30	36-27-32	193.0	81.06	10
TAZEWELL		TN BLH-891109KC	94.1	150	83-35-07	12.9	71.06	CLEAR

Call Granted 06/07/88;
 License Granted 08/29/90 per FCC release #20941 dated 09/04/90

PRM		CLASS CHANGE FROM A PROP	281C3		37-28-22	281.9	171.2	42
CAMPBELLSVILLE		KY DOC-91-271	104.1		85-16-27	100.8	129.2	CLEAR

SITE RESTRICTION 9.6 MI N; OPTION I; PRM adopted 09/06/91, released 09/30/91

WEZJ-FM LIC		WHITLEY COUNTY BROADCAST	282A	1.38	36-44-43	236.9	86.19	31
WILLIAMSBURG		KY BLH-900925KB	104.3	200	84-11-24	56.4	55.19	CLEAR

Call Granted 04/13/90 per FCC release #132 dated 04/20/90;
 License Granted 06/27/91 per FCC release #21152 dated 07/03/91

NEW	APP	MILLAR BROADCASTING COMP	283C2	50	38-07-04	323.6	131.3	106
LEXINGTON-FAYETTE		KY BPH-880825NI	104.5	150	84-16-16	143.1	25.28	CLEAR

Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600,
 adopted 11/20/90, released 01/23/91

NEW	APP	NIK-O-LIN INCORPORATED	283C2	50	38-05-30	321.5	131.4	106
LEXINGTON-FAYETTE		KY BPH-880825OL	104.5	150	84-18-53	140.9	25.36	CLEAR

Amended 12/29/88; Accepted per FCC release #NA-112 dated 01/30/90;
 Hearing DOC-90-600, adopted 11/20/90, released 01/23/91

NEW	APP	PATRICK D MCCONNELL	283C2	50	38-05-57	321.9	131.8	106
LEXINGTON-FAYETTE		KY BPH-880825OJ	104.5	150	84-18-38	141.3	25.78	CLEAR

Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600,
 adopted 11/20/90, released 01/23/91

NEW	APP	SOJOURNER COMMUNICATIONS	283C2	50	38-07-01	323.2	131.9	106
LEXINGTON-FAYETTE		KY BPH-880825NT	104.5	150	84-17-02	142.6	25.88	CLEAR

Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600,
 adopted 11/20/90, released 01/23/91

NEW	APP	ATLANTIC RADIO PARTNERS	283C2	50	38-06-53	322.9	132.0	106
LEXINGTON-FAYETTE		KY BPH-880825OH	104.5	150	84-17-23	142.4	26.00	CLEAR

Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600,
 adopted 11/20/90, released 01/23/91

NEW	APP	SUZANNE E VILLENEUVE	283C2	50	38-06-51	322.8	132.1	106
LEXINGTON-FAYETTE		KY BPH-880825NN	104.5	150	84-17-35	142.3	26.13	CLEAR

Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600,
 adopted 11/20/90, released 01/23/91

EXHIBIT E-2 (CONT)

FM Spacing study

Title: WZQQ SUBSTITUTION
Channel 284A (104.7 MHz)

Latitude: 37-10-14
Longitude: 83-22-49

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
NEW	APP	CYNTHIA W WARE	283C2	50	38-08-01	324.3	132.3	106
LEXINGTON-FAYETTE	KY	BPH-880824ML	104.5	150	84-15-48	143.8	26.28	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	SANTEE BROADCASTING INC	283C2	50	38-08-01	324.3	132.3	106
LEXINGTON-FAYETTE	KY	BPH-880825NE	104.5	150	84-15-49	143.7	26.30	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	SPANS LIMITED PARTNERSHI	283C2	50	38-06-52	322.6	132.7	106
LEXINGTON-FAYETTE	KY	BPH-880825MG	104.5	150	84-18-09	142.0	26.66	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	SUSAN L CALLER	283C2	50	38-08-04	323.9	133.1	106
LEXINGTON-FAYETTE	KY	BPH-880825OD	104.5	150	84-16-37	143.4	27.06	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
ALLOC		SITE RESTRICTION 11.4 MI	283C2		38-07-08	322.6	133.2	106
LEXINGTON-FAYETTE	KY	DOC-84-231	104.5		84-18-16	142.1	27.16	CLEAR
Filing window 07/18-08/25/88 **CLOSED**								
NEW	APP	HENRY KENNEY JR	283C2	50	38-07-27	322.9	133.4	106
LEXINGTON-FAYETTE	KY	BPH-880824MN	104.5	150	84-18-03	142.3	27.42	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	JACK L GIVENS	283C2	50	38-07-46	323.1	133.8	106
LEXINGTON-FAYETTE	KY	BPH-880825OQ	104.5	150	84-17-55	142.5	27.77	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	BETHANY-BARRETT BROADCAS	283C2	50	38-09-28	325.1	134.3	106
LEXINGTON-FAYETTE	KY	BPH-880825MK	104.5	150	84-15-36	144.5	28.28	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	S S T INC	283C2	50	38-08-28	323.6	134.5	106
LEXINGTON-FAYETTE	KY	BPH-880825MY	104.5	150	84-17-38	143.0	28.55	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
NEW	APP	MICHAEL DAVID MAHAFFEY	283C2	50	38-09-33	324.9	134.7	106
LEXINGTON-FAYETTE	KY	BPH-880824MC	104.5	150	84-15-58	144.4	28.72	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								

EXHIBIT E-2 (CONT)

FM Spacing study

Title: WZQQ SUBSTITUTION
 Channel 284A (104.7 MHz)

Latitude: 37-10-14
 Longitude: 83-22-49

Call City of License	Auth License	Licensee name St	FCC File no.	Chan ERP-kW Freq EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
NEW	APP	DJC LIMITED		283C2 50	38-10-01	325.2	135.3	106
LEXINGTON-FAYETTE		KY BPH-880825PA		104.5 150	84-15-51	144.7	29.32	CLEAR
Accepted per FCC release #NA-112 dated 01/30/90; Hearing DOC-90-600, adopted 11/20/90, released 01/23/91								
WJMD	LIC	HAZARD BROADCASTING SERV		284A .25	37-11-36	81.6	17.57	115
HAZARD		KY BLH-890807KB		104.7 346	83-11-04	261.8	-97.4	SHORT
Call Granted 09/20/89; License Granted 05/25/90 per FCC release #20872 dated 06/04/90								
WSKV	LIC	PARKS BROADCASTING INCOR		285A .44	37-45-43	328.3	77.37	72
STANTON		KY BLH-6351		104.9 207	83-50-36	148.0	5.371	CLOSE
ALLOC				285A	37-31-45	62.5	87.13	72
HAROLD		KY DOC-88-437		104.9	82-30-20	243.0	15.13	CLOSE
SITE RESTRICTION 6.9 MI E; Granted effective 12/09/91, adopted 10/11/91, released 10/24/91; Filing window 12/10-01/09/92								
WIUK	LIC	EASTERN BROADCASTING COM		286A .27	36-54-09	166.6	30.59	31
HARLAN		KY BLH-900924KA		105.1 316	83-18-01	346.6	-.41	SHORT
Call Granted 10/31/89; License Granted 06/26/91 per FCC release #21152 dated 07/03/91								
WXST	CP	TELLICO SOUND, LIMITED L		287A 6	35-48-40	207.9	170.5	31
LOUDON		TN BMPH-901214IA		105.3 100	84-16-02	27.4	139.5	CLEAR
CP Granted 04/12/91 per FCC release #21097 dated 04/18/91; Was WESK 05/24/91 per FCC release #158 dated 05/17/91; Ant: Elec. Res. Inc. FML-3								

>> End of channel 284A study <<

EXHIBIT E-3

FM Spacing study

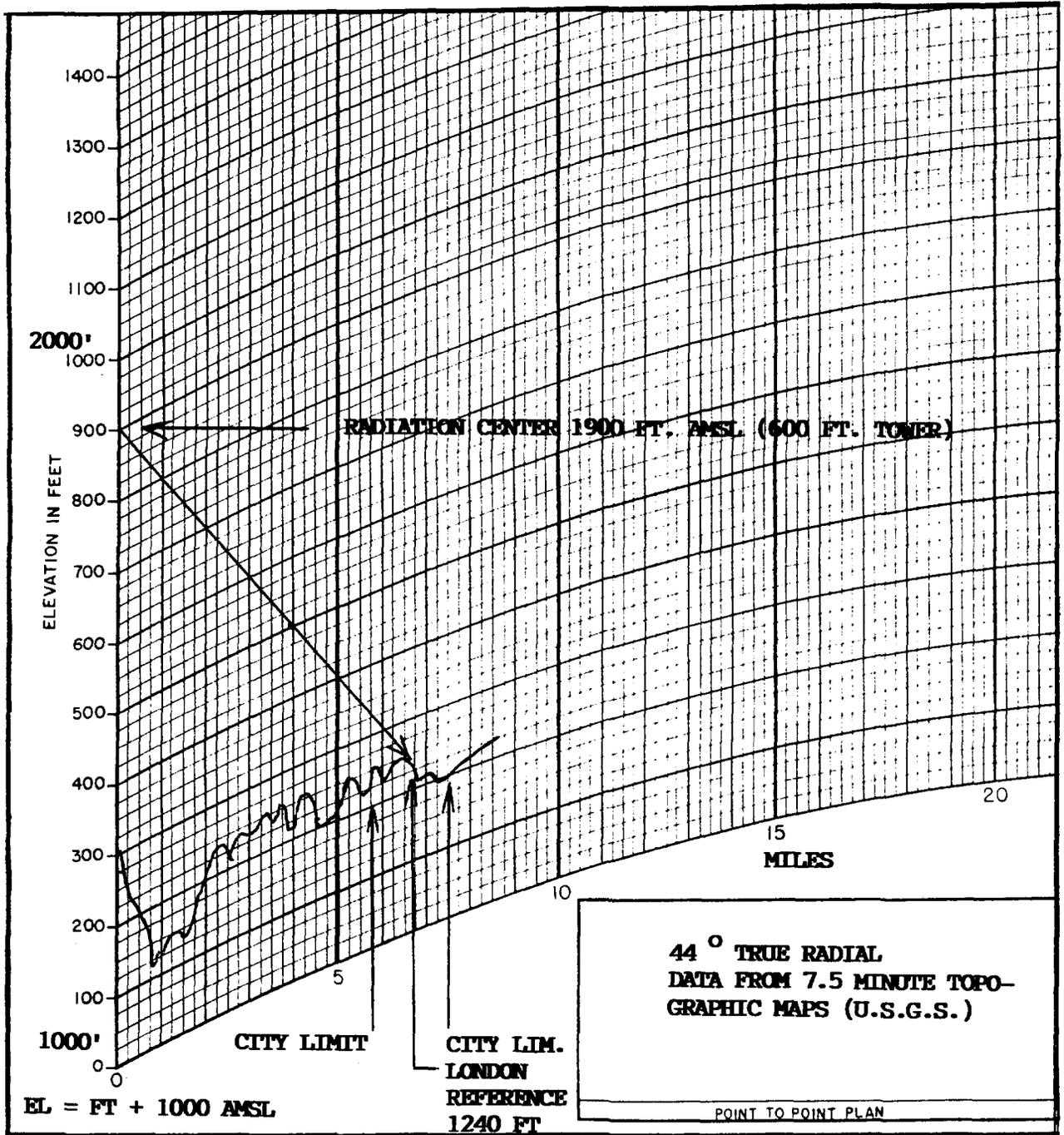
Title: WJMD SUBSTITUTION
 Channel 223A (92.5 MHz)
 Database: DW 12/17/91

Latitude: 37-11-36
 Longitude: 83-11-04
 Safety zone: 30 km

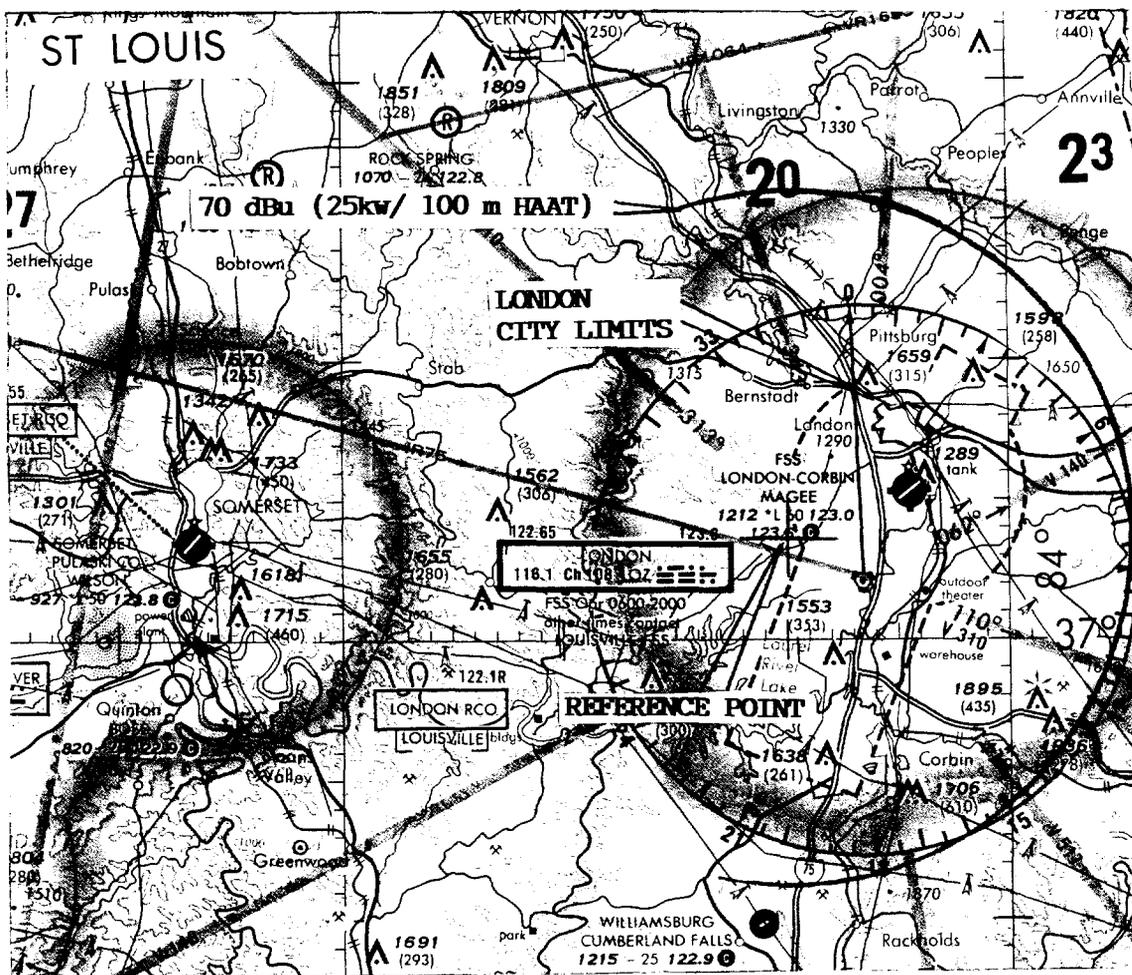
Call City of License	Auth License	Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
WUOT KNOXVILLE	LIC	UNIVERSITY OF TENNESSEE TN BLE-890201KB	*220C 91.9	100 482BT	36-00-19 83-56-23	207.3 26.8	148.1 53.15	95 CLEAR
WDHR PIKEVILLE	LIC	EAST KY BROADCASTING COR KY BLH-841015CY	221A 92.1	1.02 152	37-27-58 82-33-02	61.4 241.8	63.82 32.82	31 CLEAR
Deletion proposed; ORDERED TO 226C2; Affiliated with WPKE(AM)								
WSCC SOMERSET	LIC	SOMERSET COMMUNITY COLLE KY BLE-840202AA	*221D 92.1	.01 12	37-03-34 84-36-56	263.7 82.9	128.0	
WZQQ HYDEN	LIC	JOEY L DICK KY BLH-881121KB	222A 92.3	2.42 111	37-10-14 83-22-49	261.8 81.6	17.57 -54.4	72 SHORT
WYGE LONDON	CP	ETHEL HUFF KY BPH-880817MH	223A 92.5	3 100	37-08-40 84-08-43	266.6 86.1	85.51 -29.5	115 SHORT
CP Granted 12/20/90 per FCC release #21017 dated 12/26/90; Call Granted 02/22/91 per FCC release #152 dated 02/22/91								
WESC-FM GREENVILLE	LIC	BCG COMPANY OF THE CAROL SC BLH-800811AB	223C 92.5	100 610	35-08-16 82-36-31	167.1 347.4	233.9 7.892	226 CLOSE
WMIK-FM MIDDLESBORO	LIC	CUMBERLAND GAP BROADCAST KY BLH-791220AP	224A 92.7	.13 439	36-35-50 83-47-49	219.6 39.2	85.77 13.77	72 CLOSE
NEW NEWPORT	APP	WLIK INCORPORATED TN BPH-900222MP	225A 92.9	6 42	35-58-23 83-12-49	181.1 1.1	135.4 104.4	31 CLEAR
WDHR PIKEVILLE	ORD	EAST KY BROADCASTING COR KY BPH-910927IE	226C2 93.1	16.5 256	37-27-57 82-33-04	61.4 241.8	63.76 8.760	55 CLOSE
ORDERED FROM 221A; TDF; Amended 11/12/91; Affiliated with WPKE(AM)								
WWXL-FM MANCHESTER	CP	WILDERNESS HILLS INCORPO KY BPH-881206IE	276A 103.1	2.64 103	37-09-13 83-46-26	265.3 85.0	52.54 42.54	10 CLEAR
CP Granted 04/03/89; Affiliated with WWXL(AM)								
WTCR-FM HUNTINGTON	LIC	ALPINE MEDIA INCORPORATE WV	277B 103.3	50 150	38-25-11 82-24-06	26.5 207.0	152.6 137.6	15 CLEAR

>> End of channel 223A study <<

**EXHIBIT E-4
TERRAIN PROFILE TO LONDON**

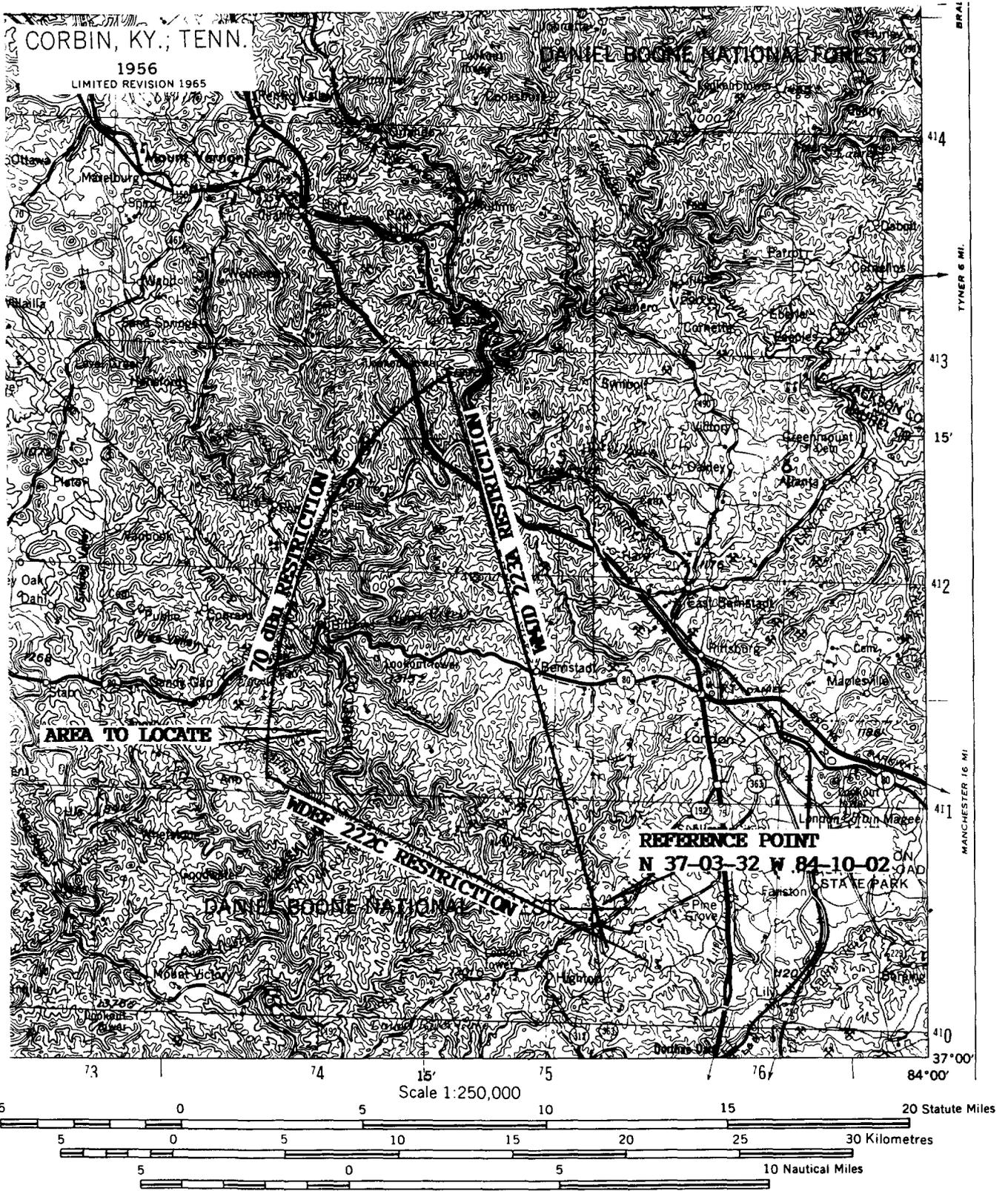


**EXHIBIT E-5
70 dBu CONTOUR**



KILOMETERS	10	20	30	40
NAUTICAL MILES	10	20	30	40
STATUTE MILES	10	20	30	40

**EXHIBIT E-6
222C3 AREA TO LOCATE**



CONTOUR INTERVAL 100 FEET

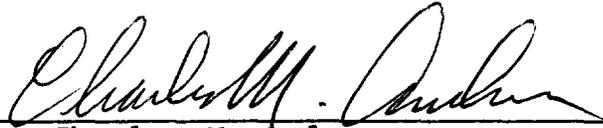
CERTIFICATION

Charles M. Anderson hereby certifies that;

His qualifications in broadcast allocation matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he holds a lifetime General Radiotelephone license(#PG-6-7352) , a bachelors degree in the physical sciences from Western Kentucky University and advanced degrees in the communications field from the University of North Carolina and Indiana University;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

/s/ 
Charles M. Anderson

January 1, 1992

Disclaimer: Charles M. Anderson assumes no liability for any errors or omissions in the information, exhibits and report provided herein; and, shall not be liable for any injuries or damages (including consequential) which might result from use of said information, exhibits and report.

Filing of this report with the Federal Communications Commission constitutes acceptance in full of the terms and conditions stated above.

Copyright (c) 1992, Charles M. Anderson.