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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

Federal Communications Commission  
Office of the Secretary

In re Amendment of )  
Section 73.202 )  
)  
East Camden and Stamps AR, ) RM-  
Minden LA )

TO: MASS MEDIA BUREAU (Policy & Rules)

PETITION FOR RULEMAKING

Y95 Radio (Y95), by its attorney, requests amendment of the FM Table of Allotments to delete Channel 237A at Camden AR and to allot Channel 237C1 to East Camden AR. The Commission should modify Y95's license for Station KCXY to reflect these changes. To accommodate the new allotment, Channel 282A should be substituted for Channel 238A (unoccupied) at Stamps AR, and the license for Station KASO-FM, Minden LA should be modified to specify Channel 239A in place of the present Channel 237A. The allotment at Minden must be changed accordingly.

The attached engineering statement of Jefferson G. Brock shows that, at the present KCXY site, KCXY can operate as a Class C1 station, meeting all required separations, if the Commission makes the two changes at Minden and Stamps.

As Mr. Brock notes, the proposed C1 operation of KCXY would appear to be limited by Station KMTB, Murfreesboro AR. However, KMTB has a long-pending petition to change channels (MM Docket 89-290). Commission action on that was delayed by involvement with MM Docket 84-231. The latter proceeding was decided by Order released January 14, 1992 (FCC 91-421). The change at Murfreesboro should be effectuated soon, and should not bar the relief requested here.

From the KCXY site, the station with C1 facilities will cover all of East Camden with the required signal. East Camden is an incorporated community. KCXY will be its first station. On the other hand, Camden has two remaining FM channels and two

No. of Copies rec'd 0+4  
List A B C D E

AM Stations.

If the FM Table is modified as requested, Y95 will reimburse the licensee of Station KASO-FM for reasonable costs it may incur in changing frequency.

If Channel 237C1 is allotted to East Camden, Y95 will promptly file application for modification, requesting the appropriate power and specifying East Camden as principal community. Upon grant of permit, Y95 will promptly construct the modified facilities and begin broadcasting.

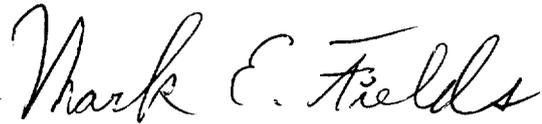
Respectfully submitted,

Y95 RADIO

March 20, 1992

Mark E. Fields, Esq.  
1825 I St. NW  
#400  
Washington DC 20006  
(202) 429-2091

BY



Mark E. Fields  
Its Attorney

PETITION FOR RULE MAKING  
Y95 RADIO  
SUBSTITUTE CHANNEL 237C1 FOR 237A  
ORDER KCXY TO CHANGE CHANNELS  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
March 1992

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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PETITION FOR RULE MAKING  
Y95 RADIO  
SUBSTITUTE CHANNEL 237C1 FOR 237A  
ORDER KCXY TO CHANGE CHANNELS  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
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TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Y95 Radio ("Y95"), licensee of Radio Station KCXY, Channel 237A, Camden, Arkansas, and supports its Petition for Rule Making to upgrade the facilities of KCXY. Y95 requests the following changes to the Commission's Table of FM Allotments, §73.202(b); the substitution of Channel 237C1 for Channel 237A at Camden, Arkansas, and the re-allotment of the upgraded channel to East Camden, Arkansas. Y95 further requests that KCXY be ordered to change Class and community of license.

In order to accommodate its request, it is necessary to substitute Channel 239A for Channel 237A at Minden, Louisiana, and it is further requested that KASO-FM be ordered to Channel 239A. Further, Y95 asks that Channel 282A be substituted for Channel 238A at Stamps, Arkansas, and that any applicants, which may be on file for the former channel at the time this proposal is being considered by the Commission, be ordered to amend their applications to specify operation on Channel 282A.

## BACKGROUND

Aside from the Minden, Louisiana, and Stamps, Arkansas, allotments previously noted above, an upgrade for KCXY may appear to impact the licensed facility of KMTB, Channel 237A, Murfreesboro, Arkansas. The licensee of KMTB, Mediatronics Broadcasting, Inc. ("MBI"), has requested an upgrade for KMTB. Specifically, in MM Docket #89-290, MBI filed a timely counterproposal seeking to upgrade KMTB to Channel 271C3. This request was in conflict with the request for Channel 271A at Magnolia, Arkansas, and another counterproposal to substitute Channel 271C2 for Channel 269A at Mena, Arkansas.

In order to remove the conflicts between these proposals, Channel 258C3 was offered as an alternate channel for Murfreesboro. However, the availability of this alternate channel was in question due to conflicts with a counterproposal in MM Docket #87-73, which was associated with Docket #84-231<sup>1</sup>. Therefore, until Docket #84-231 concluded, thus allowing Docket #87-73 to receive final action, the Murfreesboro alternate channel proposal remained, and still remains, pending before the Commission.

<sup>1</sup> Docket #84-231 was remanded to the Commission for further consideration following the outcome of Reeder VS The FCC.

On January 14, 1992, the Commission issued a Third Report and Order in MM Docket #84-231, and a subsequent ruling in Docket #87-73. Since both proceedings involved numerous communities, the final allotments made in each will not be listed here, however, due to their conclusion, the Murfreesboro proposal is now ripe for consideration. Since MBI has proposed an upgrade for KMTB on a channel far removed from Channel 237A, this instant petition will not consider KMTB as a preclusion to a KCXY upgrade and it will not be discussed further.

#### PROPOSAL

Y95 requests that Channel 237C1 be substituted for Channel 237A at Camden, Arkansas, and further the re-allotment of the upgraded channel from Camden to East Camden, Arkansas. Presently, Camden has two operating and one vacant, yet applied for, FM allotment (including Channel 237A) and 2 AM stations licensed to the community. East Camden, an incorporated community of 632 persons, has no local broadcast station. The allotment of Channel 237C1 to East Camden would provide the community with its first broadcast outlet, while not depriving Camden of its only local service. Further, an improved KCXY will continue to provide city grade service to Camden.

East Camden has a Mayor and town council and numerous businesses. It has all of the community attributes necessary

for an allotment. This proposal is mutually exclusive with the present Channel 237A allotment at Camden, Arkansas.

Therefore, Y95 requests that Channel 237C1 be allotted to East Camden, Arkansas at reference coordinates; North Latitude  $33^{\circ} 30' 14''$  and West Longitude  $92^{\circ} 48' 38''$ , (the present KCXY transmitter site). This represents a minor site restriction west of the community to allow the use of the petitioners existing tower structure. Operating from the proposed reference site, a 3.16 mV/m contour will be delivered over East Camden, Arkansas.

Exhibit #1 is a visual demonstration of the usable area for Channel 237C1. Also attached, as Exhibit #2, is a detailed clearance analysis of Channel 237C1 from the herein proposed reference location. The usable area and clearance study assume that Channel 239A is substituted for Channel 237A at Minden, Louisiana, and that Channel 282A is substituted for Channel 238A at Stamps, Arkansas, as requested below.

Channel 239A can be substituted for Channel 237A at Minden, Louisiana, at the existing KASO-FM transmitter site, at reference coordinates North Latitude  $32^{\circ} 37' 50''$  and West Longitude  $93^{\circ} 16' 56''$ . From this location, based on KASO-FM's present facility, there will be no change in city grade coverage to Minden. Further, Channel 239A is a six kilowatt

Class A allotment, the present Channel 237A allotment is a limited three kilowatt Class A. Exhibit #3 is a usable area map for Channel 239A, with a detailed clearance study attached as Exhibit #4.

Y95 also requests the substitution of Channel 282A for the vacant and yet unapplied for Channel 238A at Stamps, Arkansas. Channel 282A can be allotted to Stamps with a site restriction of 12.2 kilometers north-northwest of the community at reference coordinates North Latitude 33° 30' 14" and West Longitude 92° 48' 38". This site restriction is needed to avoid shortspacing the vacant but applied for Channel 283A at Camden, Arkansas, and the licensed facilities of KJLO-FM, Channel 281C, Monroe, Louisiana.

Exhibit #5 is the usable area for Channel 282A at Stamps, Arkansas, and demonstrates that the channel can provide the requisite city grade coverage over the community. Exhibit #6 is a clearance analysis for Channel 282A. It should be noted that Channel 238A which was recently allotted to Stamps (Docket #84-231) and was a limited Class A allotment, being made at the community reference point. At that reference location, under present §73.207 spacing requirements, there is a shortspace to the licensed KCXY facility. Therefore, in order for Channel 238A to be a six kilowatt Class A channel at Stamps, it would have to be site restricted from the community, in a similar direction as is required for Channel 282A.

## PUBLIC INTEREST ASPECTS

An improved KCXY operating as a maximum Class C1 facility would provide service to 166,503 persons, in 16,374 square kilometers, an increase of 137,855 persons and 14,791 square kilometers over its present Class A channel. Further, the allotment of Channel 237C1 to East Camden, Arkansas, will provide first local service to a community, while not depriving Camden of its only local service.

Additionally, the requested substitution of channel at Minden, Louisiana, would allow KASO-FM to upgrade its facility to a six kilowatt Class A facility, potentially increasing the population served by KASO-FM to 19,545 persons <sup>2</sup> over its present licensed facility. Due to the nature of the channel change <sup>3</sup>, only minimal disruption to the existing facility would be anticipated.

<sup>2</sup> Assumes KASO-FM as a maximum Class A facility at its present site vs its licensed operation.

<sup>3</sup> A second adjacent channel to the existing allotment is proposed at Minden, Louisiana. This potentially would allow use of the station's present transmission systems with only a minor re-tuning of the existing transmitter and antenna.

The proposed Stamps, Arkansas, alternate channel is slightly more site restricted than the existing allotment, however, since there is no actual facility being required to make a frequency change and any applicants for the channel would have just been filed, there will be no disruption or actual delay to the potential service at Stamps.

REQUEST

Y95 Radio therefore requests the following changes to §73.202(b) of the Commission's rules:

EAST CAMDEN, ARKANSAS

Present  
None

Proposed  
237C1

CAMDEN, ARKANSAS

Present  
237A, 246C2, 283A

Proposed  
246C2, 283A

MINDEN, LOUISIANA

Present  
237A

Proposed  
239A

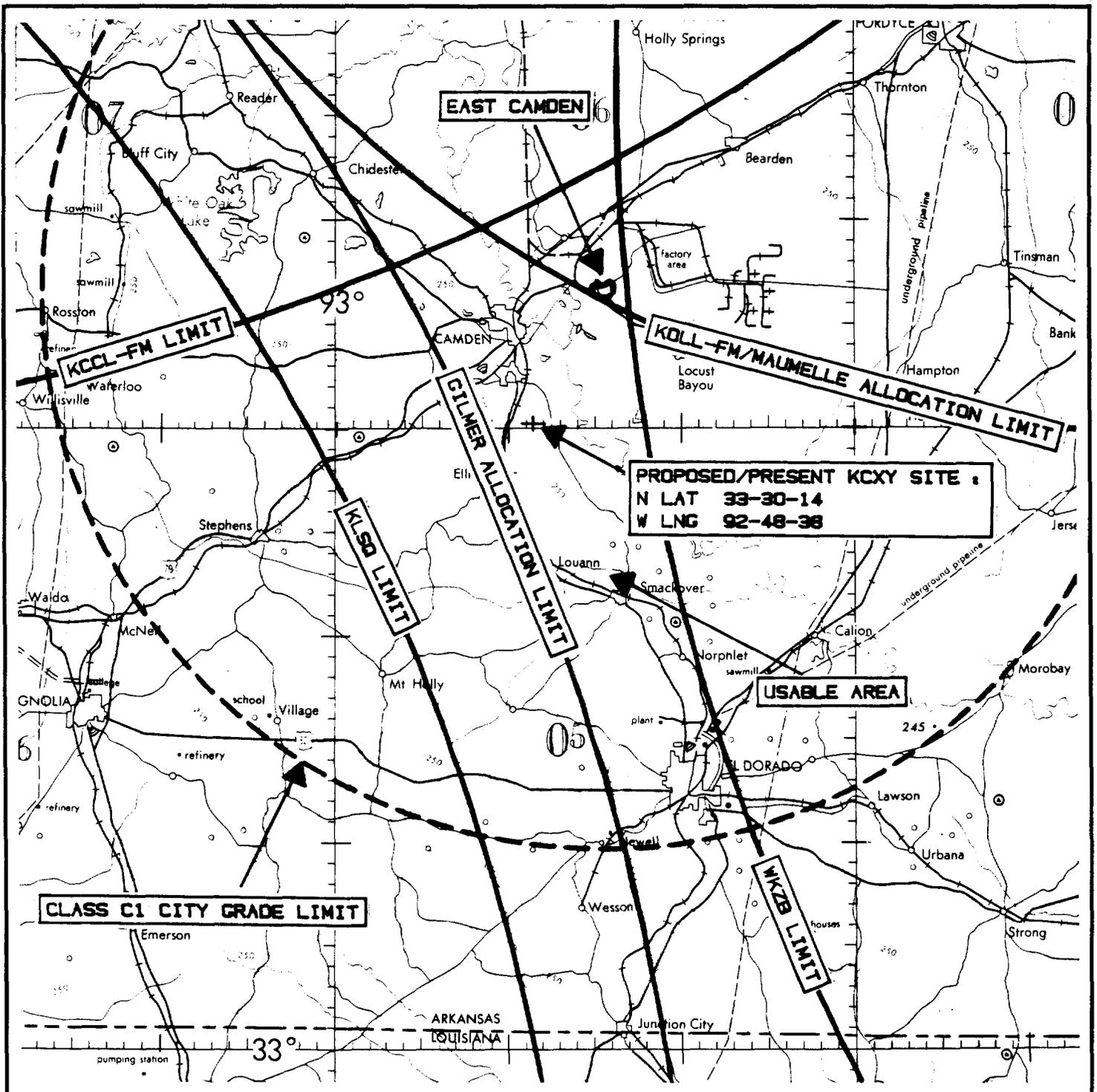
STAMPS, ARKANSAS

Present  
238A, 263C2

Proposed  
263C2, 282A

When Channel 237C1 is allotted to East Camden, Arkansas, Y95 will file, on a timely basis, an application seeking authority to make minor changes in the facilities of KCXY to specify operation on Channel 237C1 to East Camden, Arkansas. Further, Y95 will reimburse the licensee of KASO-FM for reasonable expenses to effectuate the herein proposed channel change at Minden, Louisiana.

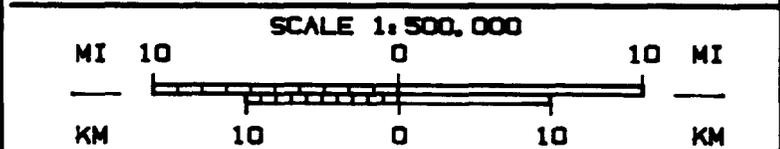
The foregoing technical statement was prepared for Y95 Radio by Bromo Communications, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should any questions arise during consideration of this proposal, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608.



**USABLE AREA CHANNEL 237C1**

MAP IS A PORTION OF THE 1:500,000 SCALE MEMPHIS SECTIONAL AERONAUTICAL CHART.

**EXHIBIT #1**  
**PETITION FOR RULE MAKING**  
**Y95 RADIO**  
**SUB. CH 237C1 FOR CH 237A**  
**RE-ALLOT CHANNEL 237C1 TO**  
**EAST CAMDEN, ARKANSAS**  
**MARCH 1992**



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

ALLOCATION STUDY FOR EAST CAMDEN, ARKANSAS  
USING PRESENT KCXY SITE/PROPOSED ALLOCATION SITE AS REF.

REFERENCE	CLASS C1	DISPLAY DATES
33 30 14 N	Current rules spacings	DATA 02-26-92
92 48 38 W	CHANNEL 237 - 95.3 MHz	SEARCH 03-17-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KCXY	237A	Camden	AR	0.0	0.00	200.0	-200.00 *
LI CN	33 30 14	92 48 38	1.000 kW	152M	0.0	124.3	
	Y95 Radio				BLH871028KG		
ALOPEN	237C3	Gilmer	TX	245.7	216.18	211.0	5.18
AL N	32 42 02	94 55 14	0.000 kW	0M	134.4	131.1	
	91-250						
	>Site Restricted-Effective 2-20-92-Rsvd For KSLQ Per D91-250						
WKZB	237A	Drew	MS	81.3	209.85	200.0	9.85
LI CN	33 47 24	90 34 28	3.000 kW	90M	130.4	124.3	
	Galtelli Broadcasting Co., In				BLH5104		
KOLLFM	235C	Pine Bluff	AR	27.8	117.60	105.0	12.60
LI CY	34 26 31	92 13 03	100.000 kW	562M	73.1	65.3	
	Southern Starr of Arkansas, I				BLH870112KA		
	>*To amend to channel 235C Maumelle, AR Per D90-493						
ALOPEN	235C	Maumelle	AR	27.8	117.60	105.0	12.60
AL N	34 26 31	92 13 03	0.000 kW	0M	73.1	65.3	
	90-493						
	>Effective 10-15-91-RSVD For KOLLFM Per D90-493						
KCCLFM	237A	Paris	AR	336.3	217.73	200.0	17.73
LI CN	35 18 06	93 45 40	0.680 kW	174M	135.3	124.3	
	Diamond State Broadcasting, In				BMLH820308AF		
KLSQ	237A	Gilmer	TX	244.1	218.30	200.0	18.30
LI CN	32 38 39	94 54 49	2.000 kW	174M	135.7	124.3	
	Curtis Broadcasting Stations,				BMLH900503KA		

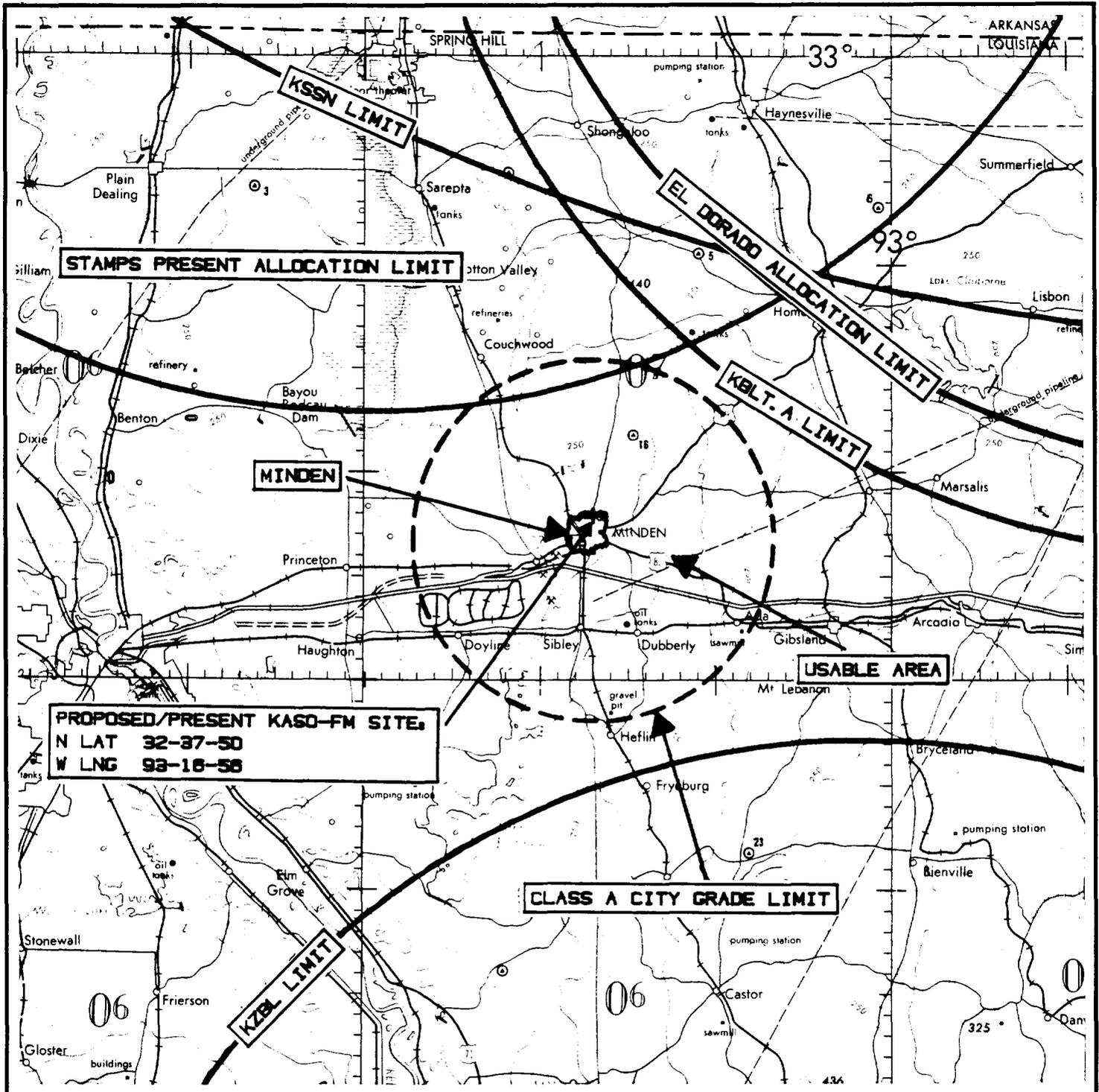
**CLEARANCE STUDY CHANNEL 237C1**

ASSUMES KASO-FM MINDEN, LOUISIANA ON CHANNEL 239A AND CHANNEL 282A ALLOCATED TO STAMPS, ARKANSAS, IN LIEU OF CH 238A.

**EXHIBIT #2**

PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
MARCH 1992

<b>BROMO</b>	BROADCAST TECHNICAL CONSULTANTS
<b>COMMUNICATIONS</b>	
St Simons Island, Georgia	Washington, D.C.



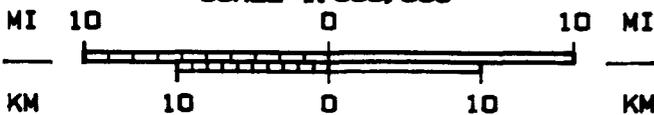
**USABLE AREA CHANNEL 239A**

MAP IS A PORTION OF THE 1:500,000 SCALE  
MEMPHIS SECTIONAL AERONAUTICAL CHART.

**EXHIBIT #3**

**PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
MARCH 1992**

**SCALE 1:500,000**



**BROMO**  
COMMUNICATIONS

BROADCAST  
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D. C.

ALLOCATION STUDY FOR MINDEN, LOUISIANA  
 USING PRESENT KASO-FM SITE AS REFERENCE

REFERENCE  
 32 37 50 N  
 93 16 56 W

CLASS A  
 Current rules spacings  
 CHANNEL 239 - 95.7 MHz

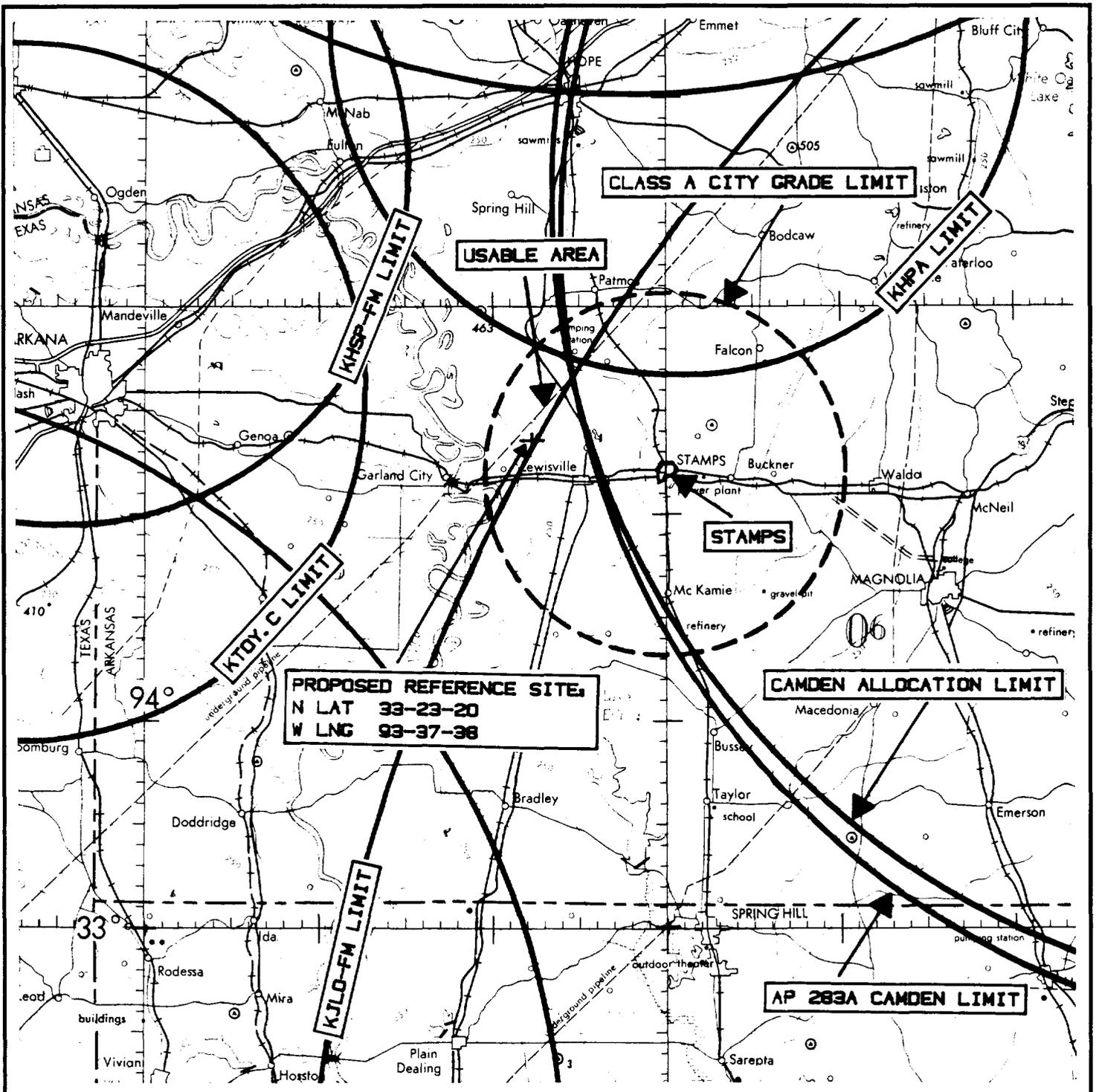
DISPLAY DATES  
 DATA 02-26-92  
 SEARCH 03-17-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KASOFM LI CN	237A 32 37 50	Minden 93 16 56	LA 3.000 kW	0.0 44M	0.00 0.0	31.0 19.3	-31.00 *
Cook Enterprises, Inc. BLH7846							
ALOPEN AD	238A 33 21 42	Stamps 93 30 00	AR 0.000 kW	345.9 0M	83.60 52.0	72.0 44.8	11.60
Billy Ratton >COA #86-1045/Further NPRM released 900220/Alternate Proposal 2, Alt >oposal 4							
KBLT.A AP CN	241C1 33 16 21	El Dorado 92 39 25	AR 100.000 kW	39.4 88M	92.12 57.3	75.0 46.6	17.12
KIXK, Inc. BPH881102IE							
KZBL LI CN	240A 31 48 18	Natchitoches 93 01 29	LA 3.000 kW	165.1 91M	94.71 58.9	72.0 44.8	22.71
Barron Broadcasting, Inc. BLH851018KC							
KSSN LI CY	239C 34 47 57	Little Rock 92 29 29	AR 100.000 kW	16.9 507M	251.45 156.3	226.0 140.5	25.45
Southern Skies Corporation BLH831117BH							
ALOPEN AL N	241C1 33 20 18	El Dorado 92 36 20	AR 0.000 kW	38.9 0M	100.80 62.7	75.0 46.6	25.80
87-73 >SITE REST-EFFECTIVE 9-23-88-RSVD FOR KIXK PER D87-73							
ALOPEN AD	240C3 33 35 00	Hooks 94 09 45	TX 0.000 kW	322.1 0M	133.85 83.2	89.0 55.3	44.85
Texarkana Broadcasting, Inc. >Site Restricted 15.7km Northeast							

CLEARANCE STUDY CHANNEL 239A

EXHIBIT #4  
 PETITION FOR RULE MAKING  
 Y95 RADIO  
 SUB. CH 237C1 FOR CH 237A  
 RE-ALLOT CHANNEL 237C1 TO  
 EAST CAMDEN, ARKANSAS  
 MARCH 1992

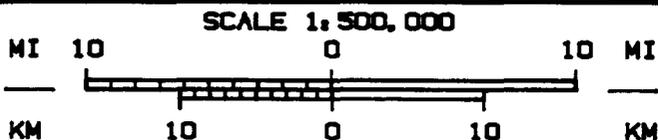
**BROMO**  
 COMMUNICATIONS  
 BROADCAST TECHNICAL CONSULTANTS  
 St Simons Island, Georgia Washington, D.C.



**USABLE AREA CHANNEL 282A**

MAP IS A PORTION OF THE 1,500,000 SCALE  
MEMPHIS SECTIONAL AERONAUTICAL CHART.

**EXHIBIT #5**  
**PETITION FOR RULE MAKING**  
**Y95 RADIO**  
**SUB. CH 237C1 FOR CH 237A**  
**RE-ALLOT CHANNEL 237C1 TO**  
**EAST CAMDEN, ARKANSAS**  
**MARCH 1982**



**BROMO**  
**COMMUNICATIONS**

St Simons Island, Georgia

BROADCAST  
 TECHNICAL CONSULTANTS

Washington, D.C.

ALLOCATION STUDY FOR STAMPS, ARKANSAS  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		CLASS A	DISPLAY DATES
33 23 20 N			DATA 02-26-92
93 37 38 W		Current rules spacings	SEARCH 03-17-92
----- CHANNEL 282 -104.3 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)	
KJLOFM LI CY	281C 32 39 36	Monroe 92 05 15	LA 100.000 kW	119.3 310M	165.01 102.6	165.0 102.6	0.01	<
New South Communications, Inc BLH880812KE								
AP283 AP CN	283A 33 33 17	Camden 92 49 32	AR 3.000 kW	76.1 100M	76.75 47.7	72.0 44.8	4.75	
Gary Coates BPH881220MD 890714								
ALOPEN AL N	283A 33 35 06	Camden 92 50 00	AR 0.000 kW	73.6 0M	76.92 47.8	72.0 44.8	4.92	
87-598 WO= 881121 881221								
>Effective 11-18-88								
KHPA LI CN	285A 33 43 10	Hope 93 29 07	AR 3.000 kW	19.8 91M	38.96 24.2	31.0 19.3	7.96	
Newport Broadcasting Co. BLH7314								
KTOY.C CP CN	284A 33 25 45	Texarkana 94 07 11	AR 3.000 kW	275.6 100M	46.03 28.6	31.0 19.3	15.03	
Jo-Al Broadcasting, Inc. BPH880616MP 930117								
KHSPFM LI CN	280A 33 36 06	Ashdown 94 04 38	AR 5.100 kW	299.4 108M	48.02 29.8	31.0 19.3	17.02	
Beat OF His Heart Broadcastin BMLH900716KD								
KJTX LI CN	283A 32 48 13	Jefferson 94 22 26	TX 1.750 kW	227.0 129M	95.25 59.2	72.0 44.8	23.25	
DLB Broadcasting, Partnership BLH901102KD								
KWXE.C CP CN	283A 34 18 38	Glenwood 93 32 04	AR 3.000 kW	4.8 100M	102.59 63.8	72.0 44.8	30.59	
Caddo Broadcasting BPH880822MC								

CLEARANCE STUDY CHANNEL 282A

**EXHIBIT #6**  
PETITION FOR RULE MAKING  
Y95 RADIO  
SUB. CH 237C1 FOR CH 237A  
RE-ALLOT CHANNEL 237C1 TO  
EAST CAMDEN, ARKANSAS  
MARCH 1992

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

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

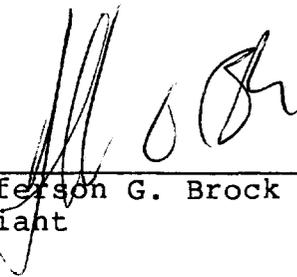
State of Georgia        )  
St. Simons Island     )  
County of Glynn        )                    ss:

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Y95 Radio, licensee of KCXY, to prepare the attached Technical Exhibit.

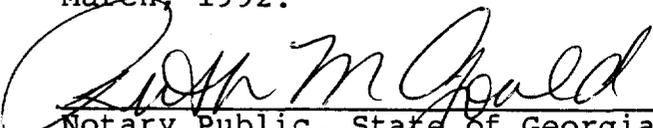
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

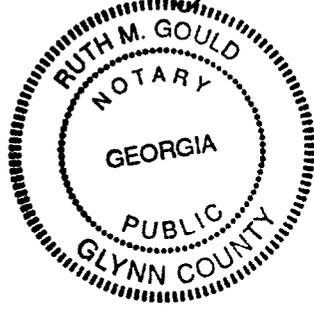
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 19th day of March, 1992.

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

Sworn to and subscribed before  
me this the 19th day of  
March, 1992.

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: August 21, 1995



CERTIFICATE OF SERVICE

I certify that on this 20 day of March 1992 a true and correct copy of the foregoing document was sent, first class mail, postage prepaid, to:

Cook Enterprises, Inc.  
KASO-FM  
Box 1240  
Minden LA 71055

*Mark E. Fields*