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Federal Communications Commission
Office of the Secretary

BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C.

**ORIGINAL
FILE**

In the Matter of)	
Amendment of Section 73.202(b),)	
Table of Allotments,)	MM Docket No.
FM Broadcast Stations)	RM-
)	
(Blacksburg and Roanoke, Virginia)	
and Lewisburg, West Virginia))	

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

PETITION FOR RULEMAKING

Blacksburg-Christiansburg Broadcasting Company ("BCBC"), licensee of WVV(FM), Blacksburg, Virginia, by its attorneys and pursuant to Section 1.420(i) of the Commission's Rules, hereby petitions the Commission to institute a rulemaking proceeding to amend the Table of FM Allotments (47 C.F.R. § 73.202(b)). BCBC seeks to amend the FM Table of Allotments in the above-captioned communities to permit a preferential arrangement of allotments, to eliminate short-spacings, and to increase the power of the Blacksburg and Roanoke stations. The proposed change in the Rules is summarized as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Blacksburg, VA	285A	287 C3
Roanoke, VA	222C, 235C, 256C, 287A	222C, 235C, 256C, 285 C3
Lewisburg, WV	288A	275A

I. PRELIMINARY STATEMENT

BCBC is the licensee of radio station WWV(FM), Blacksburg, Virginia. Accordingly, BCBC has standing to commence this proceeding. This petition seeks the issuance of a Notice of Proposed Rulemaking and Show Cause Order, looking toward a rearrangement of existing channels in use at Blacksburg and Roanoke, Virginia and Lewisburg, West Virginia, to eliminate short-spacings and improve service. No new communities are proposed to be added. Therefore, no exhaustive showing of community status is required. All of the cities have been determined to be "communities" within the meaning of the Rules.

The proposed Rulemaking deals with the following facilities:

WWV(FM) Blacksburg, Virginia (Licensee: Blacksburg-Christiansburg Broadcasting Company)	Channel 285A
BPH-8806020J Roanoke, Virginia (Permittee: Susan D. Brown)	Channel 287A
BPH-900820IE Lewisburg, West Virginia (Licensee: WKCJ(FM)) -- currently operating on program test authority)	Channel 288A

II. BCBC's PROPOSAL WILL ELIMINATE NUMEROUS SHORT-SPACING PROBLEMS AND ALLOW POWER INCREASES

Under the provisions of Section 1.420(i) of the Commission's Rules, the proposed rearrangement and reallocation of channels will result in a preferential arrangement of allotments. WVW currently operates with 2.7 kw and an antenna radiation center of 94 meters above the average terrain. The attached Engineering Statement of BCBC's consulting engineer, York David Anthony, shows in Exhibit 1 that WVW is short-spaced by 25.9 kilometers to second adjacent channel station WHAJ in Bluefield, West Virginia (Channel 283C). Under Section 73.207 of the Commission's Rules, this short-spacing limits the amount of increase in power WVW could obtain pursuant to Section 73.213 or an upgrade while allotted to channel 285A. Exhaustive engineering analyses of the WVW site indicate that the proposal described below is the only possible way to upgrade WVW.

Exhibit 2 of the attached Engineering Statement illustrates the contour overlap between WVW and WHAJ at Bluefield. In essence, WVW is "donut-holed" into the grandfathered service area of WHAJ, effectively precluding both stations from increasing to the maximum facilities for their licensed class. In fact, WVW currently interferes with WHAJ throughout the Christiansburg, Virginia urban area.

Permittee Susan D. Brown (BPH-8806020J) is presently short-spaced to channel 288A at Lewisburg, West Virginia, and to channel 288A at Altavista, Virginia. See, Engineering Statement, Exhibit 3. Both the Lewisburg (WKCJ) and Altavista (WKDE) stations are "old rules" class "A" stations which operate with 3 kw in 100 meters above the average terrain or its equivalent for a class contour distance of 24

kilometers. As indicated in Exhibit 4 of the attached Engineering Statement, WKCJ at Lewisburg, West Virginia, is reciprocally short-spaced to Brown's Roanoke station on channel 287A and to a station at Buffalo Gap, Virginia (WSKO) on 288A (BLH-870331KQ). The existing short-spacing problems are summarized as follows:

Short-Spaced To

WVW, Ch. 285A, Blacksburg, VA	→	WHAJ, Ch. 285A, Bluefield, WV
Brown, Ch. 287A, Roanoke, VA	→	WKCJ, Ch. 288A, Lewisburg, VA
Brown, Ch. 287A, Roanoke, VA	→	WKDE, Ch. 288A, Altavista, VA
WKCJ, Ch. 288A, Lewisburg, VA	→	Brown, Ch. 287A, Roanoke, VA
WKCJ, Ch. 288A, Lewisburg, VA	→	WSKO, Ch. 288A, Buffalo Gap, VA

The existing short-spacing problems can be eliminated, and power increased at WVW in Blacksburg and Brown's new station in Roanoke using the reallocation proposed herein. Engineering analysis has shown that channels 285A at Blacksburg and 287A at Roanoke can simply be exchanged at the parties present transmitter sites. Then, channel 287A at Blacksburg can be upgraded to class C3 at coordinates 37-16-14 and 80-27-39, with a modest site restriction. The use of channel 287 C3 at Blacksburg, however, would create a short-spacing at Lewisburg (WKCJ) on channel 288A unless another equivalent class channel exists and can be allotted to Lewisburg. BCBC proposes that channel 275A can be allotted to Lewisburg to eliminate this problem, thereby permitting BCBC's proposal to eliminate the numerous other short-spacing problems described above, including the short-spacing problem that exists under the present allotment between Lewisburg and Brown's station in Roanoke. See, Engineering Statement, Exhibit 9. Channel 275A can be substituted for channel 288A at the WKCJ construction permit site (which is now

operating) while fully meeting the technical requirements of the Commission's Rules. The substitution is fully spaced and would eliminate two short-spacings when implemented with the other substitutions proposed.

BCBC's requested site would place the required 70 dBu premium signal contour over Blacksburg as required by the Rules. Should the Commission modify BCBC's license for WVW from channel 285A to 287A, then to 287 C3, BCBC will immediately file an application on FCC Form 301 and expeditiously construct and operate a class C3 radio station at Blacksburg with the maximum lawful facilities. The substitution of 287 C3 for 285A at Blacksburg is mutually-exclusive with itself and cannot be the subject of competing proposals.

The proposed Lewisburg substitution to channel 275A would be involuntary and the subject of an FCC Order To Show Cause. BCBC, therefore, agrees to reimburse WKCJ for the ordinary and prudent expenses involved in exchanging channels if its proposal is implemented.

The effect of this proposed rulemaking would be to upgrade channel 285A at Blacksburg, Virginia to channel 287 C3; upgrade channel 287A at Roanoke, Virginia to channel 285 C3; and to change channel 288A at Lewisburg, West Virginia to channel 275A. The change to Lewisburg, West Virginia will eliminate one pre-1963 short-spacing and five others as a result of the six kilowatt upgrade rules, thus allowing all affected stations to increase power. The upgrades at Blacksburg and Roanoke to class C3 will provide those communities with additional area-wide radio

service, and the full class A at Lewisburg would provide an additional 1,000 kilometers of interference-free service area.

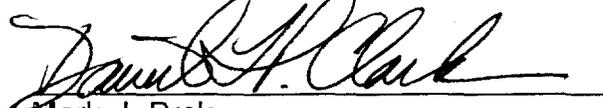
CONCLUSION

It is respectfully requested that the Commission amend the FM Table of Allotments as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Blacksburg, VA	285A	287 C3
Roanoke, VA	222C, 235C 256C, 287A	222C, 235C, 256C, 285 C3
Lewisburg, WV	288A	275A

Respectfully submitted,

**Blacksburg-Christiansburg
Broadcasting Company**



Mark J. Prak
Daniel W. Clark

Its Attorneys

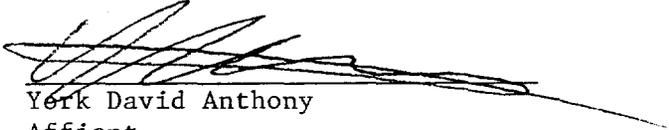
December 11, 1991

THARRINGTON, SMITH & HARGROVE
Post Office Box 1151
209 Fayetteville Street Mall
Raleigh, North Carolina 27602

AFFIDAVIT

I, York David Anthony, of 2613 Craig Avenue, Concord, North Carolina, do hereby certify the following to be true:

1. That I am a partner in Lambert & Anthony, Consulting Engineers, 2613 Craig Avenue, Concord, North Carolina 28027, a firm which is regularly engaged in the practice of electrical engineering;
2. That my qualifications as an electrical engineer are a matter of public record with the Federal Communications Commission;
3. That on the request and behalf of Blacksburg-Christiansburg Broadcasting Company, Incorporated, licensee of WVVV Blacksburg, Virginia, I was requested to prepare an engineering report, the contents of which are attached, in support of a Proposed Rulemaking to the FM Table of Allotments;
4. That the attached report was prepared by me personally;
5. That the contents of the attached report and this Affidavit are believed to be true and correct.


York David Anthony
Affiant

This the 25th day November, 1991

Mr. David Anthony
Concord, North Carolina

Page 7
March 10, 1990

FM Spacing study

EXHIBIT 1
Suburban Radio Group, Inc
WVVV Christiansburg, VA
Illustration of Short Spacing
to BLH-7705 Bluefield, VA

Title: Bill Rollins Latitude: 37-09-11
Channel 285C3 (104.9 MHz) Longitude: 80-24-57
Database: FCC 01/30/90 Safety zone: 69.8 mi

Call	Auth	Licensee name	Chan	ERP-kw	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-ft	Longitude	-from	(mi)	(mi)
WVMA	LIC	Thomas Radio Company	231B	26.5	37-57-30	324.3	68.65	10.56
Oak Hill		WV BLH-5267	94.1	6506T	81-09-03	143.9	58.09	CLEAR
WWGL	LIC	Davidson County Broadcas	231C1	100	35-58-12	172.2	82.34	14.91
Lexington		NC BLH-851223KD	94.1	486	80-12-54	352.3	67.42	CLEAR
WWGL	APC	Davidson County Broadcas	231C	100DA	35-55-02	175.4	85.48	19.26
Lexington		NC 8702271F	94.1	1220	80-17-37	355.5	66.22	CLEAR
AMENDED 871109 & 890503 & 891128								
WTON-FM	CP	Ogden Broadcasting of Vi	232B1	10	38-01-39	47.1	89.41	8.699
Staunton		VA BPH-8902061F	94.3	492	79-12-47	227.8	80.71	CLEAR
From Channel 232 A								
WKCY-FM	LIC	Mid Atlantic Network, In	282B	50DA	38-23-40	38.7	110.5	44.12
Harrisonburg		VA BLH-850417KR	104.3	135	79-08-26	219.5	66.35	CLEAR
WKCY-FM	CP	Mid Atlantic Network, In	282B	50	38-23-44	38.7	110.5	44.12
Harrisonburg		VA BPH-8703271B	104.3	492	79-08-28	219.4	66.39	CLEAR
WHAJ	LIC	Adventure Communications	283C	100	37-15-21	279.6	42.85	59.65
Bluefield		WV BLH-7705	104.5	12018T	81-10-55	99.3	-16.8	SHORT
NEW	APC	Star Communications, Inc	284A	3	38-47-40	337.4	122.9	55.30
Spencer		WV 881202NA	104.7	328	81-17-36	156.9	67.62	CLEAR
WSVS-FM	LIC	Kat Broadcasting Corp.	284C1	100	37-11-43	88.0	124.1	89.48
Crewe		VA BLH-810309AC	104.7	449	78-10-01	269.3	34.66	CLEAR
NEW	APC	Donald L. Mills	284A	3	38-49-17	337.3	125.1	55.30
Spencer		WV 881221MC	104.7	328	81-18-49	156.7	69.76	CLEAR
WNXC	APC	Ez Communications, Inc.	284C	100DA	35-15-06	186.6	132.0	109.4
Charlotte		NC BPH-8911201B	104.7	12348T	80-41-12	6.5	22.60	CLEAR
WNXC	LIC	Ez Communications, Inc.	284C	100DA	35-15-06	186.6	132.0	109.4
Charlotte		NC BLH-5510	104.7	1230	80-41-12	6.5	22.60	CLEAR
WSVS-FM	CP	Kat Broadcasting Corp.	284C1	100DA	37-10-15	88.7	135.9	89.48
Crewe		VA BPH-871106AM	104.7	981	77-57-16	270.2	46.38	CLEAR
WVVV	LIC	Blacksburg-Christiansbur	285A	2.70	37-09-11	.0		86.23
Blacksburg		VA BLH-8046	104.9	308	80-24-57	.0	-88.2	SHORT
WVVV	CP	Blacksburg-Christiansbur	285A	3	37-09-11	.0		68.23
Blacksburg		VA BPH-8502151B	104.9	312	80-24-57	.0	-88.2	SHORT

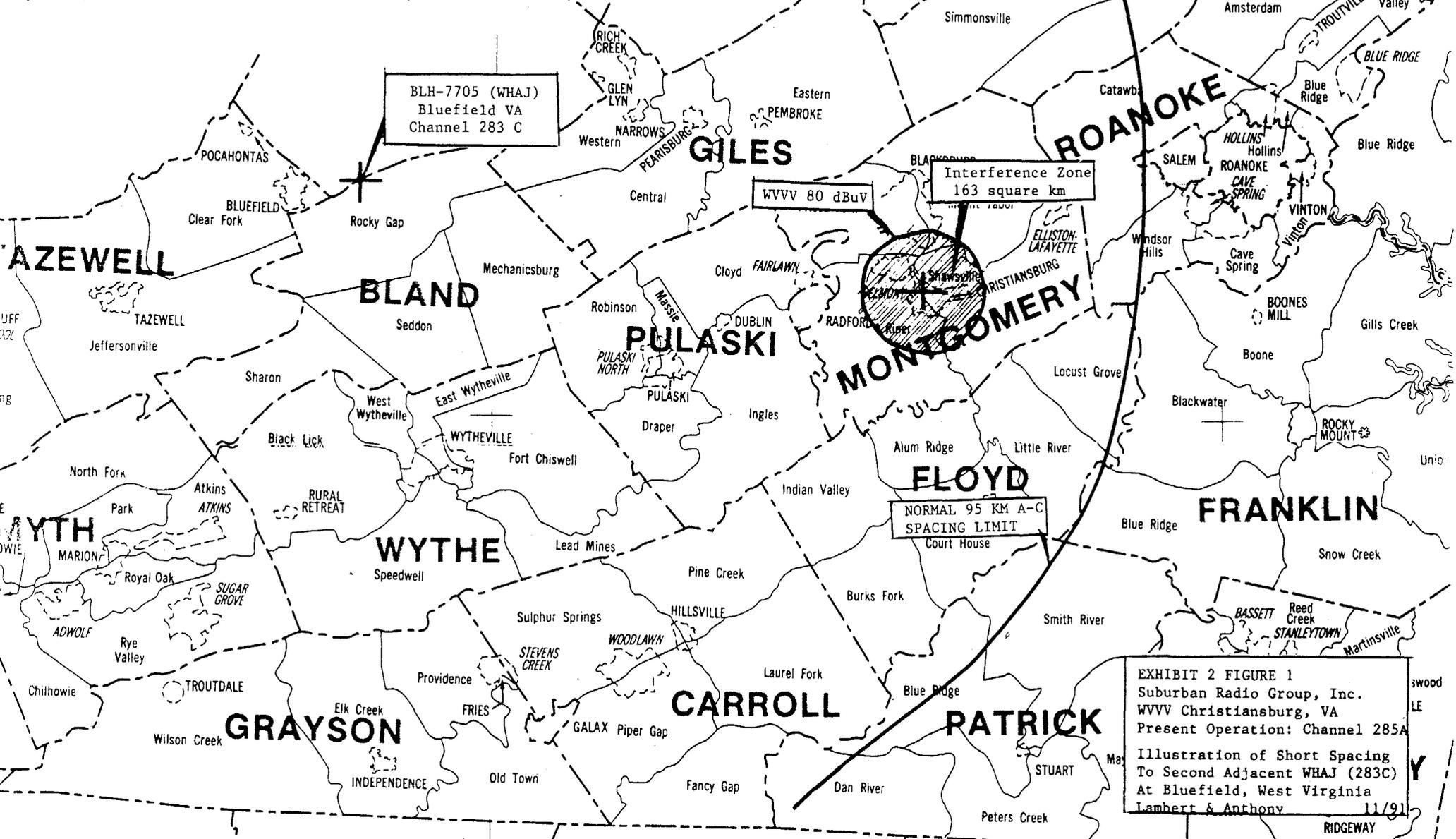
The required separation is 95 km
The separation is 69 km
The short spacing is 26 km



SCALE 1: 500,000
1 INCH REPRESENTS APPROXIMATELY 8 MILES



Sources: Base map from U.S. Geological Survey, Virginia, 1973
County, county subdivision, and place boundaries certified by local officials, January 1, 1980



BLH-7705 (WHAJ)
Bluefield VA
Channel 283 C

WVVV 80 dBuV

Interference Zone
163 square km

NORMAL 95 KM A-C
SPACING LIMIT

EXHIBIT 2 FIGURE 1
Suburban Radio Group, Inc.
WVVV Christiansburg, VA
Present Operation: Channel 285A
Illustration of Short Spacing
To Second Adjacent WHAJ (283C)
At Bluefield, West Virginia
Lambert & Anthony 11/91

Concord, North Carolina

October 15, 1991

FM Spacing study

Title: Susan D. Brown
Channel 287A (105.3 MHz)
Database: DW 10/08/91

Latitude: 37-17-01
Longitude: 79-59-14
Safety zone: 40 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)
WWMY	LIC	WWMY-FM BROADCASTING INC	233C1	100	36-20-48	176.1	104.2	22
EDEN		NC BLH-900502KA	94.5	299	79-54-30	356.2	82.21	CLEAR
License Granted 07/09/90 per FCC release #20903 dated 07/16/90; Affiliated with WLOE(AM)								
WSIF	LIC	WILKES COMMUNITY COLLEGE *234D	.01		36-08-12	220.3	166.2	
WILKESBORO		NC BLED-850712K1	94.7		81-11-02	39.6		
WSVS-FM	LIC	KAT BROADCASTING CORPORA	284C1	100	37-11-43	92.9	161.8	75
CREWE		VA	104.7	137	78-10-01	274.0	86.82	CLEAR
Affiliated with WSVS(AM)								
WVVV	LIC	BLACKSBURG CHRISTIANSBUR	285A	2.70	37-09-11	249.2	40.71	31
BLACKSBURG		VA	104.9	94	80-24-57	68.9	9.709	CLOSE
Network: ABC								
WVVV	CP	BLACKSBURG CHRISTIANSBUR	285A	3	37-09-11	249.2	40.71	31
BLACKSBURG		VA BPH-850315IB	104.9	94	80-24-57	68.9	9.709	CLOSE
CP IS HEREBY FORFEITED 2/8/91; Network: ABC; CP Granted 04/30/85								
WRDJ-FM	LIC	CLARK BROADCASTING COMPA	286A	3	38-24-30	37.0	157.2	72
BRIDGEWATER		VA BLH-890606KD	105.1	100	78-54-04	217.7	85.23	CLEAR
Call Granted 03/01/89; License Granted 07/12/90 per FCC release #20905 dated 07/18/90								
WDCG	LIC	THE DURHAM HERALD COMPAN	286C	100	35-52-20	154.5	173.3	165
DURHAM		NC BLH-880721KD	105.1	317	79-09-29	335.0	8.311	CLOSE
Affiliated with WDNC(AM)								
NEW	CP	SUSAN D BROWN	287A	3	37-17-01	.0		115
ROANOKE		VA BPH-880602OJ	105.3	23	79-59-14	.0	-115	SHORT
CP Granted 07/12/91 per FCC release dated 07/18/91								
NEW	APP	ROANOKE RADIO LTD PTSHP	287A	1.54	37-13-56	222.0	7.685	115
ROANOKE		VA BPH-880601NB	105.3	138	80-02-43	41.9	-107	SHORT
Amended 09/07/88; Hearing DOC-90-295, adopted 05/21/90, released 06/21/90								
WAGI-FM	LIC	GAFFNEY BROADCASTING INC	287C	100	35-25-05	218.2	262.0	226
GAFFNEY		SC BLH-790123AD	105.3	363	81-46-32	37.1	35.96	CLEAR
Affiliated with WEAC(AM)								
WKCJ	LIC	SENECA BROADCASTING INC	288A	3	37-42-43	316.3	66.04	72
LEWISBURG		WV	105.5	91	80-30-20	136.0	-5.96	SHORT
Network: ABC								
WKCJ	CP	SENECA BROADCASTING INC	288A	.54	37-48-17	331.2	66.16	72
LEWISBURG		WV BPH-900830IE	105.5	238	80-21-03	150.9	-5.84	SHORT
CP Granted 11/28/90 per FCC release #21008 dated 12/12/90; Ant: Jampro JLCP								

Concord, North Carolina

October 15, 1991

FM Spacing study

Title: Susan D. Brown
Channel 287A (105.3 MHz)

Latitude: 37-17-01
Longitude: 79-59-14

Call City of License	Auth Licensee name St FCC File no.	Chan Freq	ERP-kW EAM-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
WKDE-FM LIC ALTAVISTA Was WKHV 11/15/90 per FCC release #147 Affiliated with WKDE(AM)	FERNBROOK BROADCASTING C VA BLH-870130KA	288A 105.5	3 100	37-09-37 79-13-28	101.2 281.7	69.07 -2.93	72 SHORT
WFMX STATESVILLE Affiliated with WSIC(AM)	ADVENTURE COMMUNICATIONS NC BLH-871007KA	289C 105.7	100 462	35-49-55 80-42-13	201.8 21.4	173.4 78.38	95 CLEAR
WMXQ LYNCHBURG CP Granted 09/21/90 per FCC release #20959 dated 09/28/90; Call Granted 06/26/90 per FCC release #137 dated 06/29/90	FRIENDSHIP BROADCASTING C VA BPH-870918NL	290A 105.9	3 100	37-26-05 79-14-51	75.4 255.8	67.65 36.65	31 CLEAR

>> End of channel 287A study <<

NOTE: The application of Susan D. Brown is short spaced to the following (summary):

WKCJ Lewisburg, WV (BPH-900830IE)	5.8 km
WKDE Altavista, VA	2.9 km

FM Spacing study

Title: Seneca Broadcasting Inc
 Channel 288A (105.5 MHz)
 Database: DW 10/08/91

Latitude: 37-48-17
 Longitude: 80-21-03
 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)
WELK	CP	ELKINS RADIO CORPORATION	234B1	5	38-54-43	21.5	132.4	12
ELKINS		WV BPH-900726IB	94.7	222	79-47-19	201.9	120.4	CLEAR
ORDERED FROM 237A; CP Granted 04/18/91 per FCC release #21102 dated 04/26/91;								
ORDERED FROM 237A; CP Granted 04/18/91 per FCC release #21102 dated 04/26/91;								
d 08/27/91; Ant: Shiveley 6813-3								
WPVR	LIC	JIM GIBBONS RADIO INC	235C	100	37-11-50	165.5	69.65	29
ROANOKE		VA	94.9	604	80-09-11	345.6	40.65	CLEAR
Affiliated with WFIR(AM)								
WVVV	LIC	BLACKSBURG CHRISTIANSBUR	285A	2.70	37-09-11	184.5	72.55	31
BLACKSBURG		VA	104.9	94	80-24-57	4.5	41.55	CLEAR
Network: ABC								
WRDJ-FM	LIC	CLARK BROADCASTING COMPA	286A	3	38-24-30	61.7	143.7	31
BRIDGEWATER		VA BLH-890606KD	105.1	100	78-54-04	242.6	112.7	CLEAR
Call Granted 03/01/89;								
License Granted 07/12/90 per FCC release #20905 dated 07/18/90								
NEW	CP	SUSAN D BROWN	287A	3	37-17-01	150.9	66.16	72
ROANOKE		VA BPH-880602OJ	105.3	23	79-59-14	331.2	-5.84	SHORT
CP Granted 07/12/91 per FCC release dated 07/18/91								
NEW	APP	ROANOKE RADIO LTD PTSHP	287A	1.54	37-13-56	157.0	69.04	72
ROANOKE		VA BPH-880601NB	105.3	138	80-02-43	337.1	-2.96	SHORT
Amended 09/07/88; Hearing DOC-90-295, adopted 05/21/90, released 06/21/90								
WKCJ	CP	SENECA BROADCASTING INC	288A	.54	37-48-17	.0		115
LEWISBURG		WV BPH-900830IE	105.5	238	80-21-03	.0	-115	SHORT
CP Granted 11/28/90 per FCC release #21008 dated 12/12/90; Ant: Jampro JLCP								
WKCJ	LIC	SENECA BROADCASTING INC	288A	3	37-42-43	232.9	17.09	115
LEWISBURG		WV	105.5	91	80-30-20	52.8	-97.9	SHORT
Network: ABC								
WSKO	LIC	TSCHUDY COMMUNICATIONS C	288A	3	38-10-55	66.6	107.3	115
BUFFALO GAP		VA BLH-870331KQ	105.5	94	79-13-34	247.3	-7.70	SHORT
Was WSPV 03/24/89								
WKDE-FM	LIC	FERNBROOK BROADCASTING C	288A	3	37-09-37	125.4	122.6	115
ALTAVISTA		VA BLH-870130KA	105.5	100	79-13-28	306.1	7.642	CLOSE
Was WKHV 11/15/90 per FCC release #147 dated 11/16/90;								
Affiliated with WKDE(AM)								
WGTH	LIC	HIGH KNOB BCBS INC, DEBT	288A	.45	37-09-20	240.5	144.7	115
RICHLANDS		VA	105.5	244	81-46-11	59.6	29.71	CLEAR

EXHIBIT 4
Mr. David Anthony
Concord, North Carolina

Page 4
October 15, 1991

FM Spacing study

Title: Seneca Broadcasting INC
Channel 288A (105.5 MHz)

Latitude: 37-48-17
Longitude: 80-21-03

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)
WOBG-FM LIC	SALEM	BROADCASTING INCOR	289A	1.20	39-19-06	357.4	168.2	72
SALEM	WV	BLH-900925KE	105.7	177	80-26-18	177.4	96.19	CLEAR

Was WXKI 11/15/90 per FCC release #147 dated 11/16/90;
License Granted 04/12/91 per FCC release #21098 dated 04/19/91

ALLOC			290B		37-58-36	285.5	72.70	69
OAK HILL	WV		105.9		81-08-54	105.0	3.703	CLOSE

Allocated to MOUNT HOPE WV

WTNJ LIC	WEST VA	BCG INC	290B	50	37-53-12	277.3	74.81	69
MOUNT HOPE	WV		105.9	152	81-11-40	96.8	5.809	CLOSE

Network: ABC; See OAK HILL W VA

WWFO CP	MICHAEL SCOTT	COPELAND	291A	3	37-16-28	150.6	67.52	31
VINTON	VA	BPH-880427MA	106.1	47	79-58-35	330.9	36.52	CLEAR

CP Granted 11/08/90 per FCC release #20989 dated 11/15/90;
Call Granted 01/18/91 per FCC release #150 dated 01/18/91

>> End of channel 288A study <<

NOTE: The assumed operation of BPH-900830IE (under automatic PTA)
is shortspaced to the following:

WSKO Buffalo Gap, VA	-7.7 km
NEW Roanoke (8806020J)	-5.8 km

FM Spacing study

Title: Suburban Radio Group
 Channel 287C3 (105.3 MHz)
 Database: DW 10/08/91

Latitude: 37-16-14
 Longitude: 80-27-39
 Safety zone: 60 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)
WWMY	LIC	WWMY-FM BROADCASTING INC	233C1	100	36-20-48	154.2	113.8	24
EDEN		NC BLH-900502KA	94.5	299	79-54-30	334.6	89.76	CLEAR
License Granted 07/09/90 per FCC release #20903 dated 07/16/90; Affiliated with WLOE(AM)								
WSIF	LIC	WILKES COMMUNITY COLLEGE *234D		.01	36-08-12	207.3	141.4	
WILKESBORO		NC BLED-850712K1	94.7		81-11-02	26.9		
WVRC-FM	CP	STAR COMMUNICATIONS INCO	284A	3	38-47-40	337.0	184.3	42
SPENCER		WV BPH-881202MA	104.7	100	81-17-36	156.5	142.3	CLEAR
CP Granted 03/01/91 per FCC release #21069 dated 03/12/91; Call Granted 04/19/91 per FCC release #156 dated 04/19/91								
WVVV	LIC	BLACKSBURG CHRISTIANSBUR	285A	2.70	37-09-11	163.0	13.64	42
BLACKSBURG		VA	104.9	94	80-24-57	343.1	-28.4	SHORT
Network: ABC <u>DELETION PROPOSED</u>								
WVVV	CP	BLACKSBURG CHRISTIANSBUR	285A	3	37-09-11	163.0	13.64	42
BLACKSBURG		VA BPH-850315IB	104.9	94	80-24-57	343.1	-28.4	SHORT
CP IS HEREBY FORFEITED 2/8/91; Network: ABC; CP Granted 04/30/85 <u>DELETION PROP.</u>								
WKLC-FM	LIC	WKLC INC	286B	3.55	38-25-15	315.3	181.4	145
SAINT ALBANS		WV	105.1	507	81-55-27	134.4	36.35	CLEAR
Network: ABC NBC; Affiliated with WKAZ(AM)								
WDCG	LIC	THE DURHAM HERALD COMPAN	286C	100	35-52-20	142.8	194.1	176
DURHAM		NC BLH-880721KD	105.1	317	79-09-29	323.6	18.10	CLEAR
Affiliated with WDNC(AM)								
NEW	APP	ROANOKE RADIO LTD PTSHP	287A	1.54	37-13-56	96.5	37.11	142
ROANOKE		VA BPH-880601NB	105.3	138	80-02-43	276.7	-105	SHORT
Amended 09/07/88; Hearing DOC-90-295, adopted 05/21/90, released 06/21/90 <u>DELETION PROPOSED</u>								
NEW	CP	SUSAN D BROWN	287A	3	37-17-01	87.9	42.03	142
ROANOKE		VA BPH-880602OJ	105.3	23	79-59-14	268.2	-100	SHORT
CP Granted 07/12/91 per FCC release dated 07/18/91 <u>DELETION PROPOSED</u>								
WAGI-FM	LIC	GAFFNEY BROADCASTING INC	287C	100	35-25-05	210.1	237.0	237
GAFFNEY		SC BLH-790123AD	105.3	363	81-46-32	29.4	.032	CLOSE
Affiliated with WEAC(AM)								
WKCJ	LIC	SENECA BROADCASTING INC	288A	3	37-42-43	355.4	49.15	89
LEWISBURG		WV	105.5	91	80-30-20	175.4	-39.9	SHORT
Network: ABC <u>DELETION PROPOSED</u>								
WKCJ	CP	SENECA BROADCASTING INC	288A	.54	37-48-17	9.2	60.08	89
LEWISBURG		WV BPH-900830IE	105.5	238	80-21-03	189.3	-28.9	SHORT
CP Granted 11/28/90 per FCC release #21008 dated 12/12/90; Ant: Jampro JLCP								

FM Spacing study

Title: Suburban Radio Group
 Channel 287C3 (105.3 MHz)

Latitude: 37-16-14
 Longitude: 80-27-39

Call City of License	Auth Licensee name St FCC File no.	Chan ERP-kW Freq EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
WKDE-FM ALTAVISTA Was WKHV 11/15/90 per FCC release #147 dated 11/16/90; Affiliated with WKDE(AM)	LIC FERNBROOK BROADCASTING C VA BLH-870130KA	288A 3 105.5 100	37-09-37 79-13-28	96.0 276.8	110.4 21.42	89 CLEAR
WGTH RICHLANDS	LIC HIGH KNOB BCRS INC, DEBT VA	288A .45 105.5 244	37-09-20 81-46-11	264.1 83.3	116.9 27.88	89 CLEAR
WSKO BUFFALO GAP Was WSPV 03/24/89	LIC TSCHUDY COMMUNICATIONS C VA BLH-870331KQ	288A 3 105.5 94	38-10-55 79-13-34	46.6 227.4	148.6 59.60	89 CLEAR
WFMX STATESVILLE Affiliated with WSIC(AM)	LIC ADVENTURE COMMUNICATIONS NC BLH-871007KA	289C 100 105.7 462	35-49-55 80-42-13	187.8 7.6	161.1 65.11	96 CLEAR
WTNJ MOUNT HOPE Network: ABC; See OAK HILL W VA	LIC WEST VA BCG INC WV	290B 50 105.9 152	37-53-12 81-11-40	316.9 136.4	94.21 23.21	71 CLEAR
ALLOC OAK HILL Allocated to MOUNT HOPE WV		290B 105.9	37-58-36 81-08-54	322.6 142.2	99.12 28.12	71 CLEAR

>> End of channel 287C3 study <<

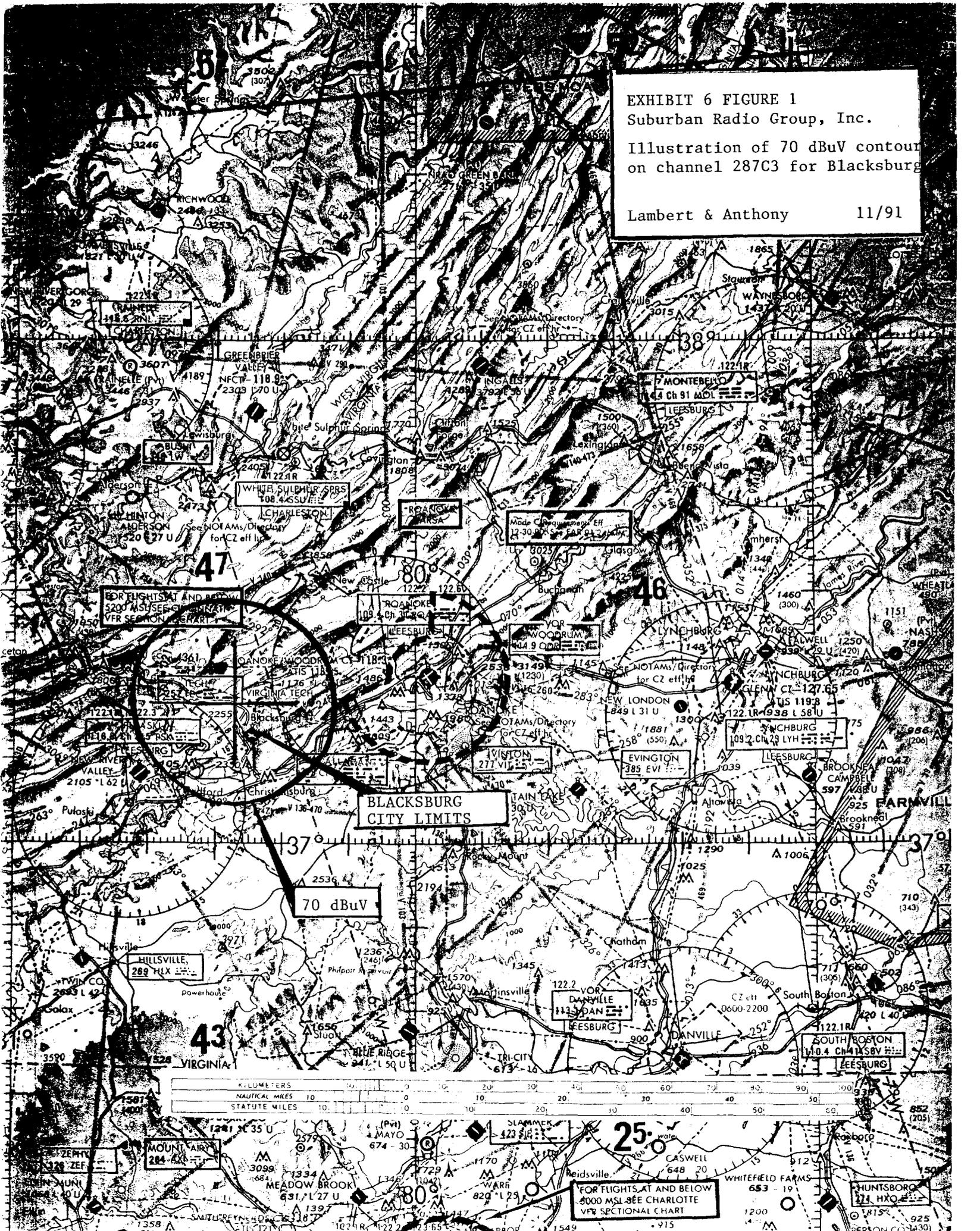
Note: The Blacksburg Proposed C3 site to the Roanoke C3 site
 is 50.60 km @ 81° True. The required distance is 43 km.

Note 2: The choice of this transmitter site is predecated on being exactly
 237 km from WAGI Gaffney, SC (cochannel) and for being 42 km from
 Susan D. Brown's present transmitter site, but operating on 285A.
 This would be the absolute closest distance to these allocation (see
 text.)

EXHIBIT 6 FIGURE 1
Suburban Radio Group, Inc.

Illustration of 70 dBuV contour
on channel 287C3 for Blacksburg

Lambert & Anthony 11/91

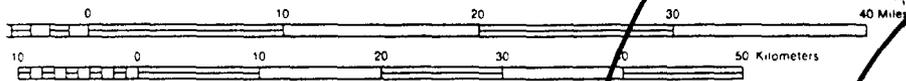


2/6-
180



SCALE 1: 500,000

1 INCH REPRESENTS APPROXIMATELY 8 MILES



Sources: Base map from U.S. Geological Survey, Virginia, 1973
county subdivision, and place boundaries certified by local officials, January, 1980

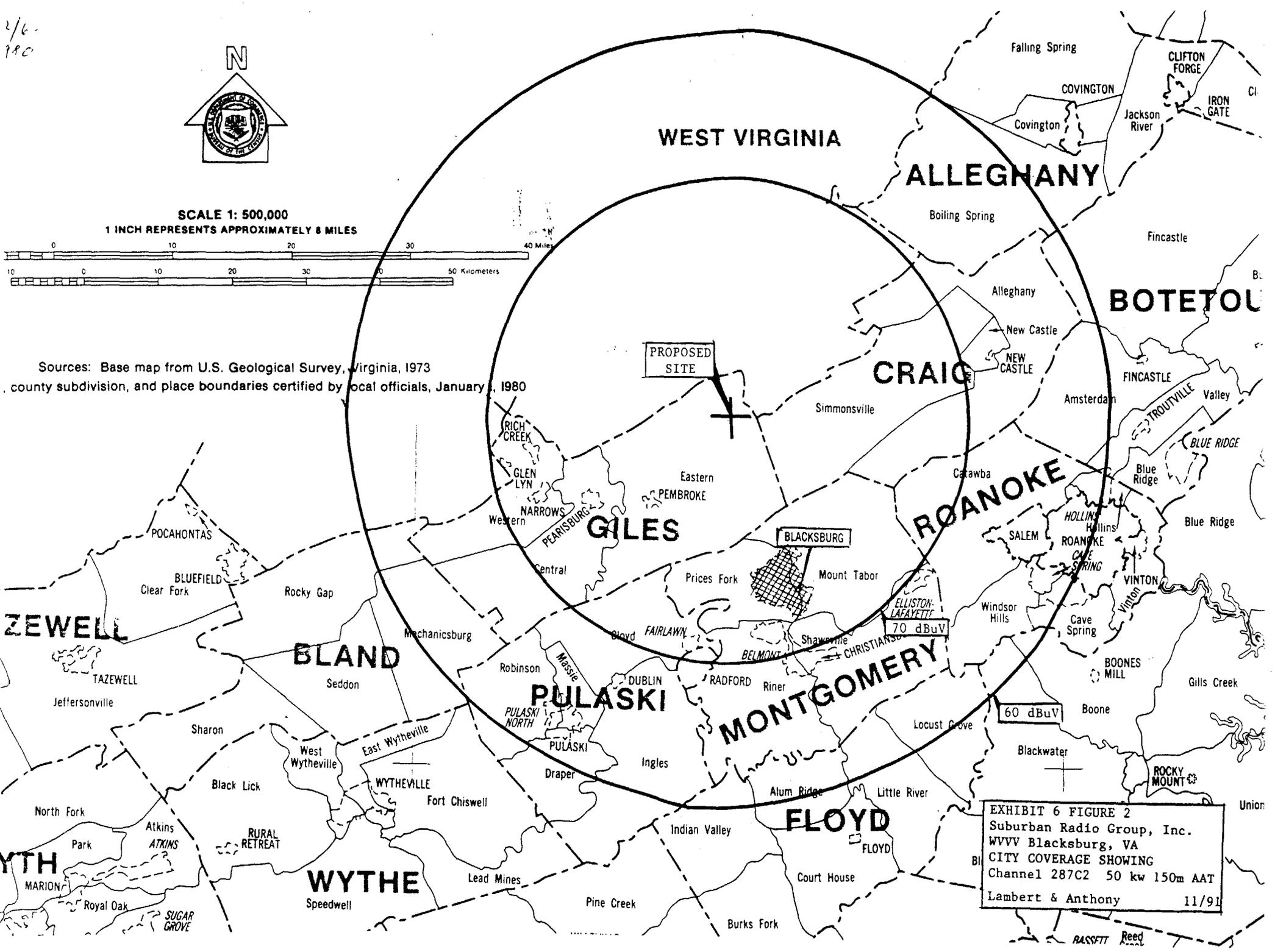


EXHIBIT 6 FIGURE 2
Suburban Radio Group, Inc.
WVTV Blacksburg, VA
CITY COVERAGE SHOWING
Channel 287C2 50 kw 150m AAT
Lambert & Anthony 11/91

FM Spacing study

Title: Susan D. Brown
 Channel 285C3 (104.9 MHz)
 Database: DW 10/30/91

Latitude: 37-20-33
 Longitude: 79-53-50
 Safety zone: 60 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)
WAXS	LIC	ADVENTURE COMMUNICATIONS	231B	25.5	37-57-30	302.2	130.0	17
OAK HILL		WV	94.1	198	81-09-03	121.4	113.0	CLEAR
Network: SMN; Was WVMA 08/06/90 per FCC release #140 dated 08/10/90; Affiliated with WOAY(AM)								
WTON-FM CP		OGDEN BROADCASTING OF VA	232B1	.33	38-09-55	29.1	104.8	14
STAUNTON		VA BMPH-891102ID	94.3	690	79-18-51	209.4	90.78	CLEAR
CP Granted 03/27/90 per FCC release #20824 dated 04/04/90; Call Granted 02/11/88; Ant: Elec. Res. Inc. FML-1E								
WKCX-FM LIC		MID ATLANTIC NTWK INCORP	282B	50DA	38-23-40	29.4	134.4	71
HARRISONBURG		VA	104.3	41	79-08-26	209.8	63.41	CLEAR
Network: CBS; Was WJSY 02/09/88; Affiliated with WKCX(AM)								
WHAJ	LIC	ADVENTURE COMMUNICATIONS	283C	83	37-15-21	265.5	114.3	96
BLUEFIELD		WV	104.5	366	81-10-55	84.8	18.31	CLEAR
Network: ABC US1; Affiliated with WHIS(AM)								
WSVS-FM LIC		KAT BROADCASTING CORPORA	284C1	100	37-11-43	95.6	154.3	144
CREWE		VA	104.7	137	78-10-01	276.6	10.34	CLOSE
Affiliated with WSVS(AM)								
WSVS-FM CP		KAT BROADCASTING CORPORA	284C1	100DA	37-10-15	95.7	173.4	144
CREWE		VA BPH-871106MH	104.7	299	77-57-16	276.9	29.40	CLEAR
CP Granted 10/04/89; Affiliated with WSVS(AM)								
WVVV	LIC	BLACKSBURG CHRISTIANSBUR	285A	2.70	37-09-11	245.5	50.59	142
BLACKSBURG		VA	104.9	94	80-24-57	65.2	-91.4	SHORT
Network: ABC <u>DELETION PROPOSED</u>								
WVVV	CP	BLACKSBURG CHRISTIANSBUR	285A	3	37-09-11	245.5	50.59	142
BLACKSBURG		VA BPH-850315IB	104.9	94	80-24-57	65.2	-91.4	SHORT
CP IS HEREBY FORFEITED 2/8/91; Network: ABC; CP Granted 04/30/85 <u>DELETION PROPOSED</u>								
WRDJ-FM LIC		CLARK BROADCASTING COMPA	286A	3	38-24-30	36.1	147.2	89
BRIDGEWATER		VA BLH-890606KD	105.1	100	78-54-04	216.7	58.23	CLEAR
Call Granted 03/01/89; License Granted 07/12/90 per FCC release #20905 dated 07/18/90								
WRDJ-FM CP		CLARK BROADCASTING COMPA	286A	2	38-24-30	36.1	147.2	89
BRIDGEWATER		VA BPH-900629IB	105.1	100	78-54-04	216.7	58.23	CLEAR
CP Granted 12/20/90 per FCC release #21019 dated 12/31/90; Call Granted 03/01/89								
WDCG	LIC	THE DURHAM HERALD COMPAN	286C	100	35-52-20	157.8	176.0	176
DURHAM		NC BLH-880721KD	105.1	317	79-09-29	338.2	.047	CLOSE
Affiliated with WDNC(AM)								

EXHIBIT 7
Mr. David Anthony
Concord, North Carolina

Page 2
November 1, 1991

FM Spacing study

Title: Susan D. Brown
Channel 285C3 (104.9 MHz)

Latitude: 37-20-33
Longitude: 79-53-50

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	CP	SUSAN D BROWN	287A	3	37-17-01	230.6	10.31	42
ROANOKE		VA BPH-880602OJ	105.3	23	79-59-14	50.5	-31.7	SHORT
CP Granted 07/12/91 per FCC release dated 07/18/91 <u>DELETION PROPOSED</u>								
NEW	APP	ROANOKE RADIO LTD PTSHP	287A	1.54	37-13-56	226.9	17.95	42
ROANOKE		VA BPH-880601NB	105.3	138	80-02-43	46.8	-24.1	SHORT
Amended 09/07/88; Hearing DOC-90-295, adopted 05/21/90, released 06/21/90 <u>DELETION PROPOSED</u>								
WKDE-FM LIC		FERNBROOK BROADCASTING C	288A	3	37-09-37	108.6	63.02	42
ALTAVISTA		VA BLH-870130KA	105.5	100	79-13-28	289.0	21.02	CLEAR
Was WKHV 11/15/90 per FCC release #147 dated 11/16/90; Affiliated with WKDE(AM)								
WKCJ	CP	SENECA BROADCASTING INC	288A	.54	37-48-17	322.3	65.10	42
LEWISBURG		WV BPH-900830IE	105.5	238	80-21-03	142.0	23.10	CLEAR
CP Granted 11/28/90 per FCC release #21008 dated 12/12/90; Ant: Jampro JLCP								
WKCJ	LIC	SENECA BROADCASTING INC	288A	3	37-42-43	307.6	67.62	42
LEWISBURG		WV	105.5	91	80-30-20	127.3	25.62	CLEAR
Network: ABC								

>> End of channel 285C3 study <<

NOTE: THE Susan D. Brown C3 site to the Blacksburg C3 site distance is
50.50 km @ 261 ° T. The required separation is 43 km.

IA
ES

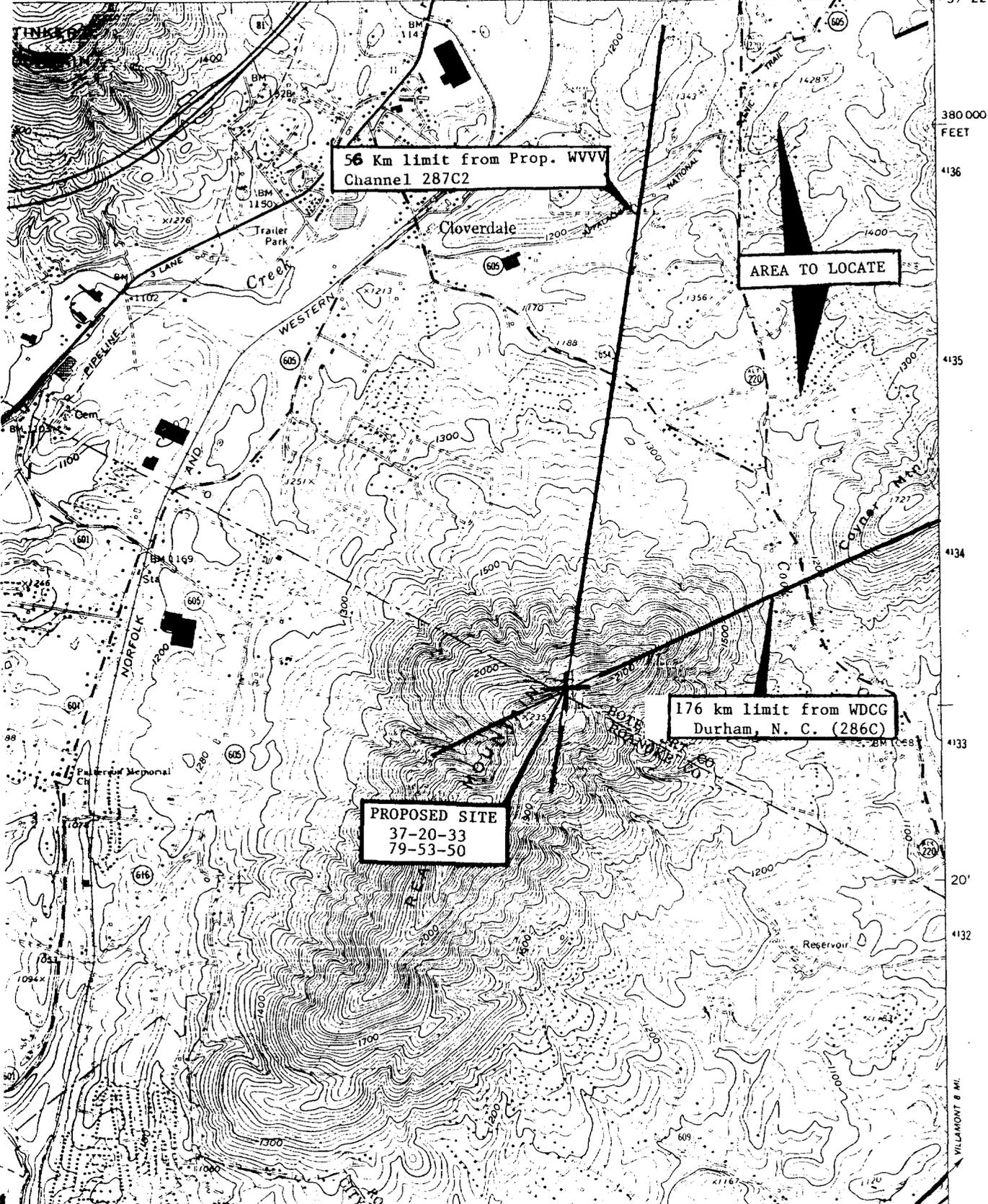
ROANOKE
VIR
7.5 MINUTE SERI

EXHIBIT 8 FIGURE 1
Susan D. Brown @ Channel 285C3
AREA TO LOCATE STUDY
Lambert & Anthony 11/91

INTERCHANGE 51 U.S. 601.41 MI.
55' 396

BUCHANAN 17 MI.
TROUTVILLE VIA U.S. 111 3.4 MI. 398

1 600 000 FEET 79° 52' 30"
37° 22' 30"



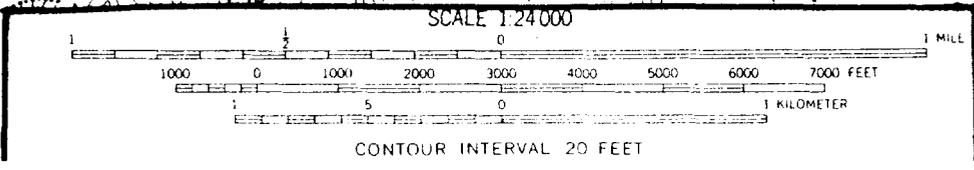
VIRGINIA
TOPOGRAPHIC
1-24000

PROPOSED SITE
37-20-33
79-53-50

176 km limit from WDCG
Durham, N. C. (286C)

56 Km limit from Prop. WVVV
Channel 287C2

AREA TO LOCATE



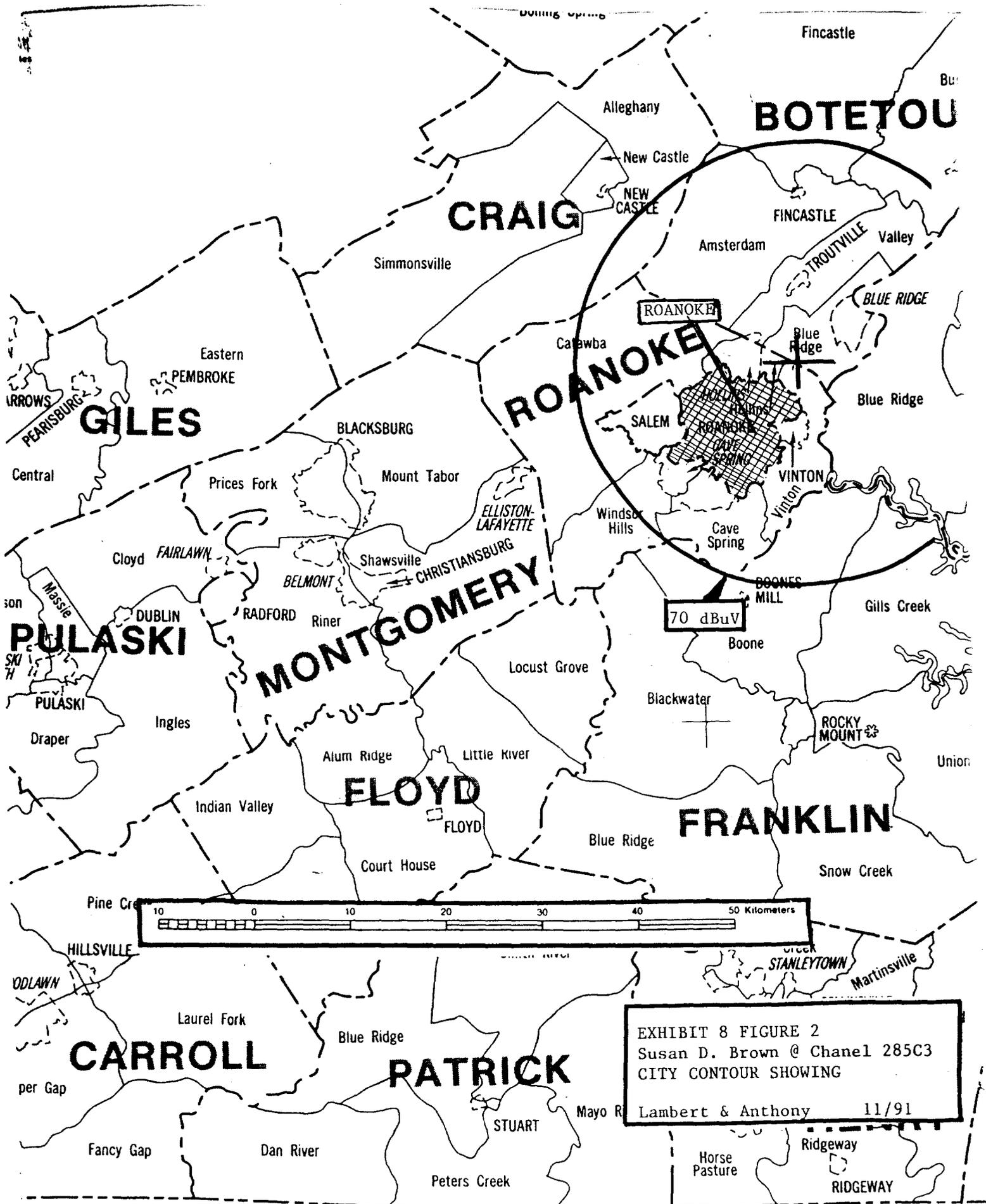


EXHIBIT 8 FIGURE 2
 Susan D. Brown @ Chanel 285C3
 CITY CONTOUR SHOWING
 Lambert & Anthony 11/91

FM Spacing study

Title: Seneca Broadcasting INC
 Channel 275A (102.9 MHz)
 Database: DW 10/08/91

Latitude: 37-48-17
 Longitude: 80-21-03
 Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WVWC	LIC	W VA WESLEYAN COLLEGE	*221D	.01	38-59-24	4.9	132.1	
BUCKHANNON		WV	92.1	-20	80-13-10	185.0		
WXLK	LIC	CEBE INVESTMENTS INC	222C	93DA	37-11-56	165.3	69.53	29
ROANOKE		VA	92.3	625	80-09-03	345.4	40.53	CLEAR
Network: US1 US2								
WMTD-FM	LIC	BLUESTONE BROADCASTERS I	272A	.16	37-42-56	259.5	53.60	31
HINTON		WV	102.3	307	80-56-55	79.1	22.60	CLEAR
Affiliated with WMTD(AM)								
WOLD-FM	LIC	EMERALD SOUND INCORPORAT	273A	.22	36-54-10	226.7	145.4	31
MARION		VA BLH-901214KF	102.5	367	81-32-27	46.0	114.4	CLEAR
ORDERED FROM 272A; Network: MBS; License Granted 07/01/91 per FCC release #15032 dated 07/08/91; Ant: Jampro JSCP-2R; Affiliated with WOLD(AM)								
WZST	LIC	LBS BROADCASTING INCORPO	274B	22.2	37-28-07	107.1	124.3	113
APPOMATTOX		VA BLH-890602KC	102.7	227	79-00-27	287.9	11.30	CLOSE
Deletion proposed; ORDERED TO 274C1; Call Granted 03/28/89; License Granted 06/01/90 per FCC release #20875 dated 06/07/90								
WVSR-FM	LIC	AMLAR BROADCASTING LTD P	274B	50	38-21-26	298.5	130.8	113
CHARLESTON		WV	102.7	123	81-40-05	117.6	17.83	CLEAR
Network: AP USP; Was WVSR 12/09/88; Affiliated with WVSR(AM)								
WZST	ORD	LBS BROADCASTING INCORPO	274C1		37-19-55	110.5	147.1	133
APPOMATTOX		VA DOC-91-8	102.7		78-47-45	291.5	14.06	CLOSE
ORDERED FROM 274B; Call Granted 03/28/89								
WELC-FM	LIC	POCAHONTAS BROADCASTING	275A	1.80	37-25-01	249.2	119.7	115
WELCH		WV BLH-900207KC	102.9	129	81-36-58	68.5	4.723	CLOSE
Call Granted 04/13/89; License Granted 12/27/90 per FCC release #21021 dated 01/03/91								
WRAU	LIC	WHITE WATER BROADCASTING	276A	.12	37-16-05	252.0	187.3	72
ELKHORN CITY		KY BLH-7381	103.1	418	82-21-37	70.8	115.3	CLEAR
Network: AP; Was WECL 06/01/90 per FCC release #135 dated 06/01/90; Affiliated with WBPA(AM)								
WUAG	LIC	UNIVERSITY OF NC AT GREE	*276D	.02	36-03-51	165.9	199.1	
GREENSBORO		NC BLED-880819KC	103.1	79	79-48-37	346.2		
EDUCATIONAL OPERATION								
WAKG	LIC	PIEDMONT BROADCASTING CO	277C	100	36-44-28	143.8	145.9	95
DANVILLE		VA BLH-900904KB	103.3	199	79-23-05	324.4	50.86	CLEAR
License Granted 06/12/91 per FCC release #21137 dated 06/18/91; Affiliated with WDVA(AM)								

FM Spacing study

Title: Seneca Broadcasting INC
Channel 275A (102.9 MHz)

Latitude: 37-48-17
Longitude: 80-21-03

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)
ALLOC		278A		36-54-28	223.0	135.6	31
MARION	VA DOC-90-412	103.5		81-23-25	42.3	104.6	CLEAR

SITE RESTRICTION 8.4 MI NE; Granted effective 02/11/91, adopted 12/10/90,
released 12/26/90; Filing window 02/12-03/14/91 **CLOSED** ; DOC-90-412

>> End of channel 275A study <<

CERTIFICATE OF SERVICE

I, Kathryn P. Freese, with the law firm of THARRINGTON, SMITH & HARGROVE, hereby certify that a copy of the foregoing PETITION FOR RULEMAKING was this day served upon the parties listed below in the manner indicated:

Hand-Delivered to:

Mr. Andrew Rhodes
Chief, Allocations Branch
Mass Media Bureau
Federal Communications Commission
Room 8334
2025 M Street, N.W.
Washington, DC 20554

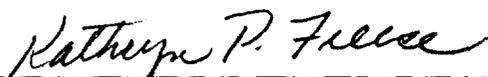
Ms. Leslie Shapiro
Allocations Branch
Mass Media Bureau
Federal Communications Commission
Room 8313
2025 M Street, N.W.
Washington, DC 20554

U.S. Mail, First Class:

WKCJ(FM) Radio Station
c/o Mr. Kenneth Bryant, General Manager
200 W. Washington Street
Lewisburg, West Virginia 24901

Ms. Susan D. Brown
6531 Deepwoods Drive
Roanoke, Virginia 24018

This the 16th day of December, 1991.



Kathryn P. Freese