

ALLAN G. MOSKOWITZ, ESQ.

May 14, 2019

Received & Inspected

MAY 15 2019

FCC Mail Room

Ms Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Petition for Rulemaking  
Ridgebury, Athens, Whitneyville, Pennsylvania  
DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

On behalf of Southern Belle, LLC, licensee of Radio Station WZBF, Ridgebury, Pennsylvania, by its attorney and pursuant to Section 1.401 of the Commission's rules, I am herewith filing an original and 4 copies of a "Petition for Rulemaking" to amend Section 73.202, Table of Allotments, to reallocate Channel 245A from Ridgebury, Pennsylvania to Channel 296B1 at Athens, Pennsylvania and the substitution of Channel 245A for Channel 296A at Whitneyville, Pennsylvania.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

By   
Allan G. Moskowitz

Enclosure

No. of Copies rec'd 0 + 4  
List ABCDE  
SMB-Judith 19-3

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20024

Public File posted

MAY 15 2013

ACM/MLP

In the Matter of: )  
Amendment of Section 73.202(b) )  
Table of Assignments for )  
FM Broadcast Stations )  
(Ridgebury, Athens, and )  
(Whitneyville, Pennsylvania )

To: Assistant Chief, Audio Division, Media Bureau

PETITION FOR RULEMAKING

Southern Belle, LLC, (hereinafter "Petitioner"), pursuant to Section 1.401 of the Commission's Rules, respectfully requests that the Commission institute a rulemaking proceeding to reallocate Channel 245A from Ridgebury, Pennsylvania (FIN 40383) to Channel 296B1 at Athens, Pennsylvania. This community of license, channel, and class change does not require any site change to station WZBF, Ridgebury. In support thereof the following is shown:

1. The instant petition for rule making is filed concurrently with a request for the substitution of Channel 245A for Channel 296A for FM Station WLIH, Whitneyville, Pennsylvania (FIN 24576). WLIH, Whitneyville will be able to continue to operate at its current transmitter site with the same licensed ERP on Channel 245A at Whitneyville. If WLIH so desires, it can increase its current licensed ERP from 3.3 kilowatts ERP to 6 kilowatts ERP; thus effectuating an upgrade of its facilities at its current transmitter site. The allotment of Channel 296B1 to Athens, Pennsylvania and the allotment of Channel 245A to Whitneyville, Pennsylvania can be made in compliance with the Commission's separation and allocation requirements. Channel 296B1 may be allotted at the reference coordinates of 41-53-55 North Latitude; 76-43-08 West Longitude (NAD 27), which is the current WZBF antenna site and is

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List ABCDE  
mb-Audio 19-3

approximately 17 kilometers from the community coordinates of Athens, Pennsylvania.

Attached to the end of this petition is a Channel Study showing that these allotment coordinates are fully spaced to all allotments per 47 CFR 73.207. Additionally, an allotment reference coordinate study is included showing that the entire community of Athens is contained within a circle 23.2 km from the allotment coordinates (the standard 70 dBu coverage distance for a Class B1) and an additional contour study is included showing that the entire community of Athens, PA is contained within the proposed 70 dBu contour from the current WZBF antenna site with operation at 13 kilowatts at 139.7 meters height above average terrain (equivalent to the Class B1 maximum of 25 kilowatts at 100 meters height above average terrain). There will be no change to the WLIH antenna location or community of license. A study easily shows that Whitneyville, PA is located within a circle 16.2 km from the allotment coordinates (the standard 70 dBu coverage distance for a Class A) and within the 70 dBu contour of the current facility at the current antenna site. The current WLIH antenna site is also the location of the current and proposed reference coordinates.

2. This would provide Athens, Pennsylvania with its first local broadcast service, but will not result in the removal of the only local broadcast service from Ridgebury, Pennsylvania.

Southern Belle requests that the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Present Channel</u>	<u>Proposed Channel</u>
Ridgebury, Pennsylvania	212B1, 245A	212B1
Athens, Pennsylvania		296B1
Whitneyville, Pennsylvania	296A (3KW)	245A (6KW)

**CHANNEL 245A ALLOTMENT FROM RIDGEBURY, PENNSYLVANIA TO  
CHANNEL 296B1 AT ATHENS, PENNSYLVANIA**

3. WZBF, Channel 245A, Ridgebury, Pennsylvania is currently operating as one of two broadcast stations licensed to serve Ridgebury. Ridgebury is also served by FM station WCIH, 90.3 mHz, Channel 212B1, Ridgebury, Pennsylvania. WCIH operates with 4 kilowatts ERP at

160.5 meters height above average terrain. As such, a change of community of license for WZBF will not result in Ridgebury being unserved by a local broadcast service. Ridgebury is also served by at least five other broadcast services. These services include WHGL-FM, Canton, PA (60 dBu service); WENI-FM, South Waverly, PA (60 & 70 dBu service); WLKY (FM), Elmira, NY (60 & 70 dBu service); WOKN (FM), Southport, NY (60 & 70 dBu service); WNBT-FM, Wellsboro, PA (Class B, 54 dBu service); and WATS (AM), Sayre, PA (2 mV/m service). At any location, WZBF, licensed to Athens, PA, will continue to provide at least 60 dBu service to Ridgebury, PA. As such, Ridgebury will continue to be served by at least eight aural services. A coverage study is attached as Exhibit 1. It should also be noted that because Ridgebury, PA has a population of 1,978 persons (2010 US Census) it is not considered to be a community with a significant population (which is defined as a population of 7,500 persons or more) for purposes of second local service.

4. The new community of license proposed for WZBF, Ridgebury, PA is Athens, PA which does not have a local broadcast facility licensed to it. Athens has a population of 3,367 persons based on the listing in the 2010 US Census. Athens is the largest borough or city in the Bradford County, Tioga County, Potter County, Wyoming County, Wayne County, or Susquehanna County, PA border areas without a broadcast facility allotted to it. Athens, PA conforms to the Commission's policies with regard to it being a community for allotment purposes. In addition, Athens is a substantial and sufficiently independent community, and is not located within any urbanized area. Athens is located in Bradford County, Pennsylvania. Athens has its own U.S. Post Office along with its own U.S. Postal Service zip code (18810). Athens has its own school district along with a number of its own schools including, "The Athens Area High School", "The Harlan Rowe Junior High School", and "The Lynch-Bustin Elementary School." Athens is home to Historic District which includes the Spalding Memorial Library-Tioga Point Museum, listed on the national Register of Historic Places. Athens has its own

Volunteer Fire Department, "The Athens Borough Fire Department". Athens is Borough in Pennsylvania with an elected mayor, Borough Council, and Borough Hall and is so recognized by the U.S. Census Bureau. Athens has its own Police Department.

5. Athens contains businesses and organizations that identify themselves as being part of Athens including "Athens Agway," "Athens Express," "The Athens Business Association," "The Athens Health and Rehab Center," and "The Athens Masonic Association." Athens has a number of churches including "The Athens United Methodist Church", "The Calvary Baptist Church", "The First Presbyterian Church of Athens", and "The Greater Valley Assembly of God". Athens contains a number of legal and professional services offices including "The Jennings Law Office", "Jonathon P. Foster, Atty.", "Nationwide Insurance", "The Susan E. Hartley Law Office", "Gannon Associates", and "ProCare Physical Therapy". Athens has a number of banking institutions including "The Peoples State Bank" and "The Citizen's and Northern Bank". Athens has industrial manufacturing concerns that are the primary employers in the community such as "Mason Dixon Energy" and "Chesapeake Energy". Athens is located within the Marcellus Shale Natural Gas Area of Pennsylvania and is the second largest community within the busiest drilling county in Pennsylvania. Consequently, Athens falls well within the well-established standard of a "geographically-identifiable population grouping" that constitutes a licensable community. See, e.g., *FM Channel Policies/Procedures*, 90 FCC 2d 88, 101(1982); *East Hemet, California et al.*, 4 FCC Rcd 7895, 7896 (M.M. Bur. 1989); *Grema, Marianna, Quincy and Tallahassee, Florida*, 6 FCC Rcd 633 (M. M. Bur 1991).

6. Athens, PA is sufficiently independent of any urbanized area and justifies a first local service preference. The nearest urbanized area is over 15 miles away in another state. Exhibit 2 of this attachment is an allocations study showing that this proposed allotment is fully spaced

under the Table of Distances in 47 CFR 73.207 with a site restriction of 17 kilometers West-Southwest (allotment coordinates are N. Lat. 41-53-55, W. Long. 76-43-08). Exhibit 3 of this attachment is a map showing that Athens, Pennsylvania is within a circle 23.2 km from the allotment coordinates (the standard 70 dBu coverage distance for a Class B1) using the fully spaced allotment coordinates of N. Lat. 41-53-55, W. Long. 76-43-08. Exhibit 4 of this attachment is an allocations study showing that this proposed antenna site is fully spaced under the Table of Distances in 47 CFR 73.207 (coordinates are N. Lat. 41-53-55, W. Long. 76-43-08). Exhibit 5 of this attachment is a map showing that Athens, Pennsylvania is located within the 70 dBu contour of the proposed antenna site located at N. Lat. 41-53-55, W. Long. 76-43-08.

7. Because Athens, PA is not located near any urbanized area, no Tuck showing should be needed.<sup>1</sup>

8. To accommodate this petition for rule making a concurrent request is being made for the substitution of Channel 245A for Channel 296A for FM Station WLIH, Whitneyville, Pennsylvania (FIN 24576). WLIH, Whitneyville will be able to continue to operate at its current transmitter site with the same licensed ERP on Channel 245A at Whitneyville. If WLIH so desires, it can increase its current licensed ERP from 3.3 kilowatts ERP to 6 kilowatts ERP; thus effectuating an upgrade of its facilities at its current transmitter site. Petitioner hereby requests that an Order to Show Cause be directed to Good Christian Radio Broadcasting Co Inc., (“Good”), licensee of Station WLIH to show cause why its license should not be modified to specify operation on Channel 245A. Petitioner states that it will reimburse “Good” the licensee of WLIH any reasonable costs incurred in connection

<sup>1</sup> If a station requests to change its community of license to one that is outside an urbanized area but whose signal would place a city grade, 70 dBu signal, over 50% or more of an Urbanized Area, the proponent is required to provide the same showings as currently required for those parties seeking to move to a community within an Urbanized

Area. See Headland, Alabama and Chattahoochee, Florida, 10 FCC Red. 10352 (1995), with the proposed channel change consistent with the "Circleville" policy (Circleville, Ohio, 8 FCC 2d 159 (1967)). As noted, there will be no change to the WLIH antenna location or community of license. Attached as Exhibit 6 is an allocations study showing that the WLIH allotment on Channel 245A is fully spaced under the Table of Distances in 47 CFR 73.207 with no site restriction (allotment coordinates are N. Lat. 41-46-13, W. Long. 77-12-08; the current WLIH site coordinates). Attached as Exhibit 7 is a map showing that Whitneyville, PA is located within a circle 16.2 km from the allotment coordinates (the standard 70 dBu coverage distance for a Class A). Attached as Exhibit 8 is an allocations study showing that the current WLIH site, with operation on Channel 245A, is fully spaced under the Table of Distances in 47 CFR 73.207 (N. Lat. 41-46-13, W. Long. 77-12-08; the current WLIH site coordinates). Exhibit 9 of this attachment is a map showing that Whitneyville, Pennsylvania is located within the 70 dBu contour of WLIH on Channel 245A at the current WLIH site located at N. Lat. 41-46-13, W. Long. 77-12-08.

9. This Petition for Rulemaking will result in a preferential arrangement of allotments allowing for the upgrade of the WZBF facilities from Class A to Class B1 at its current transmitter site, with Athens, PA specified as its community of license. This upgrade in the WZBF facilities will result in a large gain in coverage area. The 60 dBu contour will increase from 110,784 persons covered to 170,431 persons. This is an increase of 59,647 persons covered, an increase of 35 percent. The 70 dBu contour will increase from 17,444 persons covered to 66,572 persons covered, an increase of 49,128 persons covered, an increase of 74 percent. WLIH could also benefit if it chooses to upgrade to a full 6 kw Class A FM. The 60 dBu contour for WLIH will increase from 27,203 persons covered to 33,961 persons covered, an increase of

6,758 persons covered, an increase of 20 percent. All population figures in this paragraph are from the 2010 U.S. Census.

10. It should be noted that the WZBF Channel 245A to Channel 296B1 Class upgrade, Channel change, and Community of License change cannot be accomplished unless the WLIH Channel 296A change to Channel 245A is simultaneously done. These two facility changes depend on each other to be accomplished.

11. An additional attachment is enclosed to address considerations with regard to the FCC's Rural Radio Order. This attachment will analyze the current WZBF Channel 245A 70 dBu coverage area versus the proposed WZBF Channel 296B1 70 dBu coverage area with regard to the Elmira, NY Urbanized Area. This attachment shows that less than 30 percent of the Elmira Urbanized Area is covered with 70 dBu service from the WZBF Channel 296B1 site. Additional transmitter sites are reviewed in the attachment. None of these transmitter sites provide either more than 50 percent 70 dBu coverage (population or area) of the Elmira Urbanized area and also provide Athens, PA with requisite 70 dBu coverage. As such, this Petition for Rulemaking conforms to the new rules and policies put forth in the FCC's Rural Radio Order (*Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rule Making*, 25 FCC Rcd 2556 (2011)).

12. Southern Belle, LLC hereby requests the reallocation of Station WZBF, Channel 245A, Ridgebury, Pennsylvania to Channel 296B1, Athens, Pennsylvania, as that community's first local service. This reallocation is conditioned on the simultaneous reallocation of Channel 296A to Channel 245A for WLIH, Whitneyville, Pennsylvania. These reallocations will result in great efficiency and would result in a preferential arrangement of FM Channel allotments. Southern



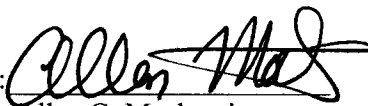
Belle, LLC hereby certifies that if this Petition for Rulemaking is granted that it will rapidly effectuate its Class B1 upgrade for Athens, Pennsylvania and will reimburse the licensee of WLIH any reasonable costs incurred in connection with the proposed WLIH channel change consistent with the "Circleville" policy (Circleville, Ohio, 8 FCC 2d 159 (1967)).

### **CONCLUSION**

13. This proposal will serve the public interest by providing Athens, Pennsylvania with its own first local service, that of Channel 296B1. The WZBF facility would also greatly benefit from a Class B1 upgrade. Ridgebury, Pennsylvania would continue having a local service from station WCIH, Ridgebury, Pennsylvania. WLIH could benefit from an 6 kw facility upgrade on Channel 245A. In conclusion, Southern Belle, LLC requests this rearrangement of allotments in such a way as to provide improved service to the local communities involved, which will result in a greater benefit to the public.

Respectfully submitted,

SOUTHERN BELLE, LLC

BY:   
Allan G. Moskowitz  
Its Attorney

Allan G. Moskowitz, Esq.  
10845 Tuckahoe Way  
North Potomac, MD 20878  
(301) 908-4165

May 14, 2019

## EXHIBIT 1

## Contour Analysis

Kevin Fitzgerald

Job: WZBF Ridgebury Services.fmj

Master Database: 2019\_Apr\_30.fmd

Lat: N41:59:58 Lon: W076:37:48 NAD-27

Scale: 1:750000

Channel: 245 Class: B1

Status: Licensed, Construction Permit, Application

Channels:

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description: WZBF, 107.1, Athens, PA; Class B1; Ridgebury, PA Broadcast Services

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Date: 5/9/2019 8:50:46 AM

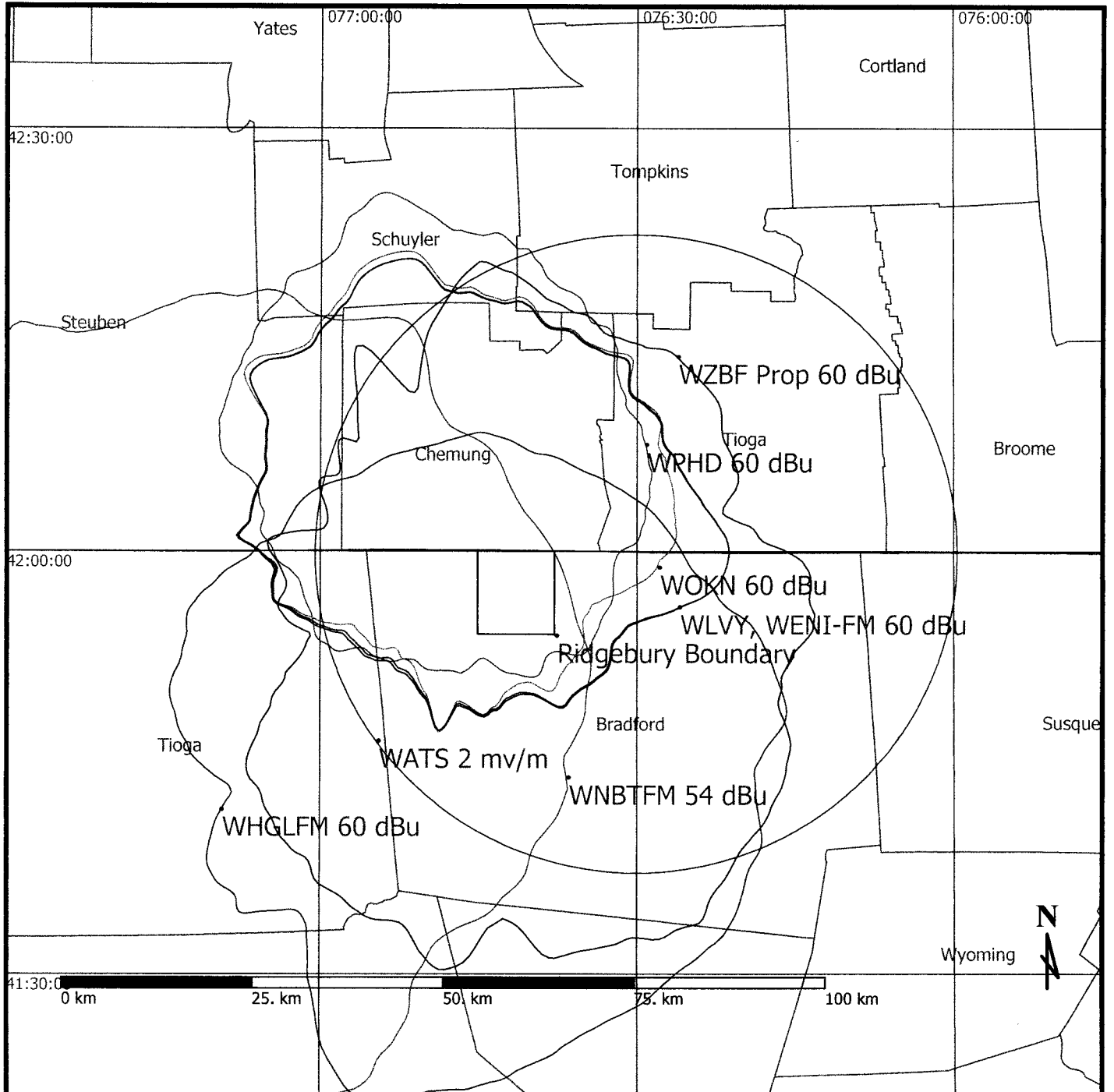
Key:

City Grade

Protected

107.1

2nd/3rd Adj



## EXHIBIT 2

Kevin Fitzgerald

Job: WZBF Ch296 Allot.fmj

Master Database: 2019\_Apr\_17.fmd

Lat: N41:53:55 Lon: W076:43:08 NAD-27

Channel: 296 Class: B1

Status: Licensed, Construction Permit, Application

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 100 km

Comments: No Comments

Description: WZBF, 107.1, Athens, PA; Allotment Spacing; WLIH to Change Channel to

Channel 245A

Page 1 of 1

Date: 4/22/2019 12:21:00 AM

rfInvestigator Version 3.8.16

by rfSoftware, Inc.

Callsign	City	Stat	Ser	Channel	Cla	Stat	73	207	73	207	ERP	HAAT	Adjacency	Distanc	Bear	Latitude (NAD27)	Longitude (N	73	215
WLIH	WHITNEYVILLE PA	FM	296	: 107.1	A	LIC	143		-100.39	3.30	91		Co-Chan	42.61	250	N41:46:13	W077:12:08	-76.39	
WEZX	SCRANTON PA	FM	295	: 106.9	A	LIC	96		12.01	1.45	188		1st Adj	108.01	125	N41:20:52	W075:39:03	36.01	
WNBL	SOUTH BRISNY	FM	297	: 107.3	A	LIC	96		14.77	0.65	303		1st Adj	110.77	328	N42:44:47	W077:25:35	38.77	
WSYR-FM	SOLVAY NY	FM	295	: 106.9	B1	LIC	114		15.88	9.00	124		1st Adj	129.88	019	N43:00:10	W076:11:58	33.88	
WQKK	RENOVO PA	FM	295	: 106.9	A	LIC	96		17.12	0.80	267		1st Adj	113.12	230	N41:14:15	W077:45:02	41.12	
WBB1	ENDWELL NY	FM	298	: 107.5	A	LIC	48		17.24	2.20	166		2nd Adj	65.24	066	N42:08:17	W075:59:59	23.24	
WCDW	PORT DICKI NY	FM	294	: 106.7	A	LIC	48		18.55	1.20	221		2nd Adj	66.55	075	N42:03:22	W075:56:39	24.55	
WQJU	MIFFLINTO PA	FM	296	: 107.1	A	LIC	143		18.69	0.37	397		Co-Chan	161.69	204	N40:34:20	W077:30:51	42.69	
WWYY	BELVIDERE NJ	FM	296	: 107.1	A	LIC	143		24.68	0.84	266		Co-Chan	167.68	129	N40:56:53	W075:09:38	48.68	
WEGH	NORTHUMB PA	FM	297	: 107.3	A	LIC	96		27.57	0.90	257		1st Adj	123.57	179	N40:47:10	W076:41:49	51.57	
WCOH-F	DU BOIS PA	FM	297	: 107.3	B	LIC	145		32.92	18.50	247		1st Adj	177.92	246	N41:14:08	W078:39:38	63.92	
CILQFM	TORONTO ON	FM	296	: 107.1	C1		256		35.96	40.00	421		Co-Chan	291.96	312	N43:38:33	W079:23:15	291.96	
INTL:ADD	TRENTON ON	FM	296	: 107.1	B		223		36.36	0.00	0		Co-Chan	259.36	343	N44:07:42	W077:39:42	259.36	
WCFT-FM	BLOOMSBUR PA	FM	293	: 106.5	B	LIC	71		38.40	10.50	313		3rd Adj	109.40	167	N40:56:18	W076:25:38	44.40	
WKVU	UTICA NY	FM	297	: 107.3	B	LIC	145		42.71	50.00	152		1st Adj	187.71	043	N43:08:40	W075:10:32	73.71	
WCIG	DALLAS PA	FM	299	: 107.7	A	LIC	48		46.83	2.35	162		3rd Adj	94.83	133	N41:18:54	W075:53:19	52.83	
WPEL-FM	MONTROSE PA	FM	243	: 96.5	MB	LIC	17		54.15	57.00	140		IF	71.15	094	N41:51:16	W075:51:50	54.15	
WJSA-FM	JERSEY SH PA	FM	242	: 96.3	MB1	LIC	14		77.94	2.65	306		IF	91.94	216	N41:13:45	W077:22:02	77.94	
WLKK	WETHERSFIELD NY	FM	299	: 107.7	B	LIC	71		81.56	17.00	258		3rd Adj	152.56	302	N42:37:25	W078:17:21	87.56	
WKZA	LAKEWOOD NY	FM	295	: 106.9	B1	LIC	114		97.70	5.10	225		1st Adj	211.70	272	N41:57:31	W079:16:11	115.70	

## EXHIBIT 3

## Contour Analysis

Kevin Fitzgerald

Job: WZBF Ch296 Allot.fmj

Master Database: 2019\_Apr\_17.fmd

Lat: N41:53:55 Lon: W076:43:08 NAD-27

Scale: 1:500000

Channel: 296 Class: B1

Status: Licensed, Construction Permit, Application

Channels:

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description: WZBF, 107.1, Athens, PA; Class B1, Standard Reference Allotment Contour, 23.2 km

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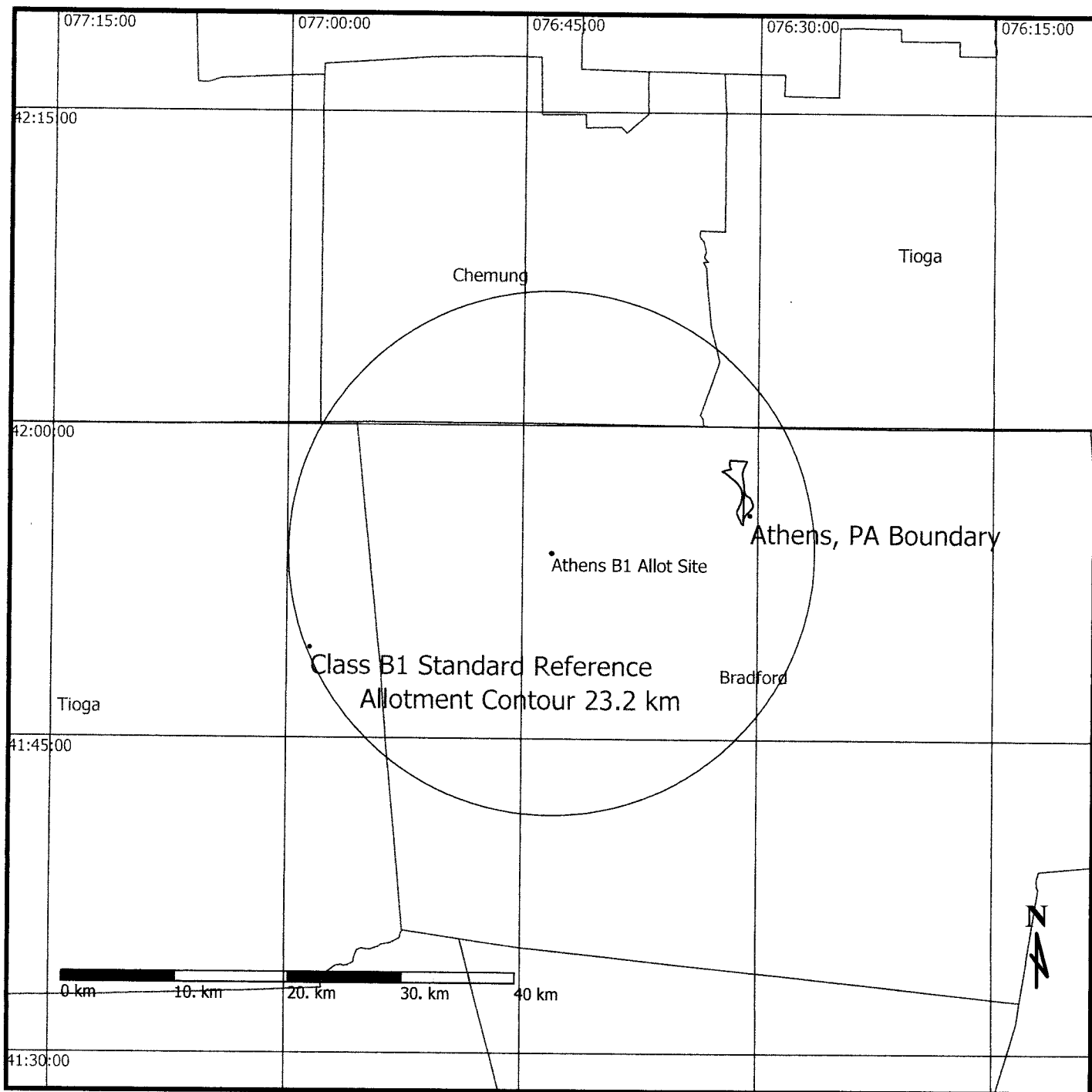
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Key:

City Grade

Protected

2nd/3rd Adj



## EXHIBIT 4



Kevin Fitzgerald  
 Job: WZBF Ch296 Col.fmj  
 Master Database: 2019\_Apr\_30.fmd  
 Lat: N41:53:55 Lon: W076:43:08 NAD-27  
 Channel: 296 Class: B1  
 Status: Licensed, Construction Permit, Application  
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
 Range: 100 km  
 Comments: No Comments  
 Description: WZBF, 107.1, Athens, PA; Site Spacing Study

Page 1 of 1  
 Date: 5/1/2019 12:16:47 AM  
 rfInvestigator Version 3.8.16  
 by rfSoftware, Inc.

Callsign	City	Stat	Ser	Channel	Cla	Stat	73	207	73	207	ERP	HAAT	Adjacency	Distanc	Bear	Latitude (NAD27)	Longitude (N	73	215
WLIH	WHITNEYVILPA	FM	296	: 107.1	A	LIC	143		-100.39	3.30	91		Co-Chan	42.61	250	N41:46:13	W077:12:08	-76.39	
WEZX	SCRANTON PA	FM	295	: 106.9	A	LIC	96		12.01	1.45	188		1st Adj	108.01	125	N41:20:52	W075:39:03	36.01	
WNBL	SOUTH BRISNY	FM	297	: 107.3	A	LIC	96		14.77	0.65	303		1st Adj	110.77	328	N42:44:47	W077:25:35	38.77	
WSYR-FM	SOLVAY	NY FM	295	: 106.9	B1	LIC	114		15.88	9.00	124		1st Adj	129.88	019	N43:00:10	W076:11:58	33.88	
WQKK	RENOVO PA	FM	295	: 106.9	A	LIC	96		17.12	0.80	267		1st Adj	113.12	230	N41:14:15	W077:45:02	41.12	
WBBJ	ENDWELL NY	FM	298	: 107.5	A	LIC	48		17.24	2.20	166		2nd Adj	65.24	066	N42:08:17	W075:59:59	23.24	
WCDW	PORT DICKI NY	FM	294	: 106.7	A	LIC	48		18.55	1.20	221		2nd Adj	66.55	075	N42:03:22	W075:56:39	24.55	
WQJU	MIFFLINTO PA	FM	296	: 107.1	A	LIC	143		18.69	0.37	397		Co-Chan	161.69	204	N40:34:20	W077:30:51	42.69	
WYYY	BELVIDERE NJ	FM	296	: 107.1	A	LIC	143		24.68	0.84	266		Co-Chan	167.68	129	N40:56:53	W075:09:38	48.68	
WEGH	NORTHUMB PA	FM	297	: 107.3	A	LIC	96		27.57	0.90	257		1st Adj	123.57	179	N40:47:10	W076:41:49	51.57	
WCOH-F	DU BOIS PA	FM	297	: 107.3	B	LIC	145		32.92	18.50	247		1st Adj	177.92	246	N41:14:08	W078:39:38	63.92	
CILQFM	TORONTO ON	FM	296	: 107.1	C1		256		35.96	40.00	421		Co-Chan	291.96	312	N43:38:33	W079:23:15	291.96	
INTL:ADD	TRENTON ON	FM	296	: 107.1	B		223		36.36	0.00	0		Co-Chan	259.36	343	N44:07:42	W077:39:42	259.36	
WCFT-FM	BLOOMSBUR PA	FM	293	: 106.5	B	LIC	71		38.40	10.50	313		3rd Adj	109.40	167	N40:56:18	W076:25:38	44.40	
WKVU	UTICA NY	FM	297	: 107.3	B	LIC	145		42.71	50.00	152		1st Adj	187.71	043	N43:08:40	W075:10:32	73.71	
WCIG	DALLAS PA	FM	299	: 107.7	A	LIC	48		46.83	2.35	162		3rd Adj	94.83	133	N41:18:54	W075:53:19	52.83	
WPEL-FM	MONTROSE PA	FM	243	: 96.5	MB	LIC	17		54.15	57.00	140		IF	71.15	094	N41:51:16	W075:51:50	54.15	
WJSA-FM	JERSEY SH PA	FM	242	: 96.3	MB1	LIC	14		77.94	2.65	306		IF	91.94	216	N41:13:45	W077:22:02	77.94	
WLKK	WETHERSFNY	FM	299	: 107.7	B	LIC	71		81.56	17.00	258		3rd Adj	152.56	302	N42:37:25	W078:17:21	87.56	
WKZA	LAKEWOOD NY	FM	295	: 106.9	B1	LIC	114		97.70	5.10	225		1st Adj	211.70	272	N41:57:31	W079:16:11	115.70	

## EXHIBIT 5

## Contour Analysis

Kevin Fitzgerald

Job: WZBF Ch296 Col.fmj

Master Database: 2019\_Apr\_30.fmd

Lat: N41:53:55 Lon: W076:43:08 NAD-27

Scale: 1:500000

Channel: 296 Class: B1

Status: Licensed, Construction Permit, Application

Channels:

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description: WZBF, 107.1, Athens, PA; Class B1 70 dBu Coverage

rfInvestigator Version 3.8.16

by rfSoftware, Inc.

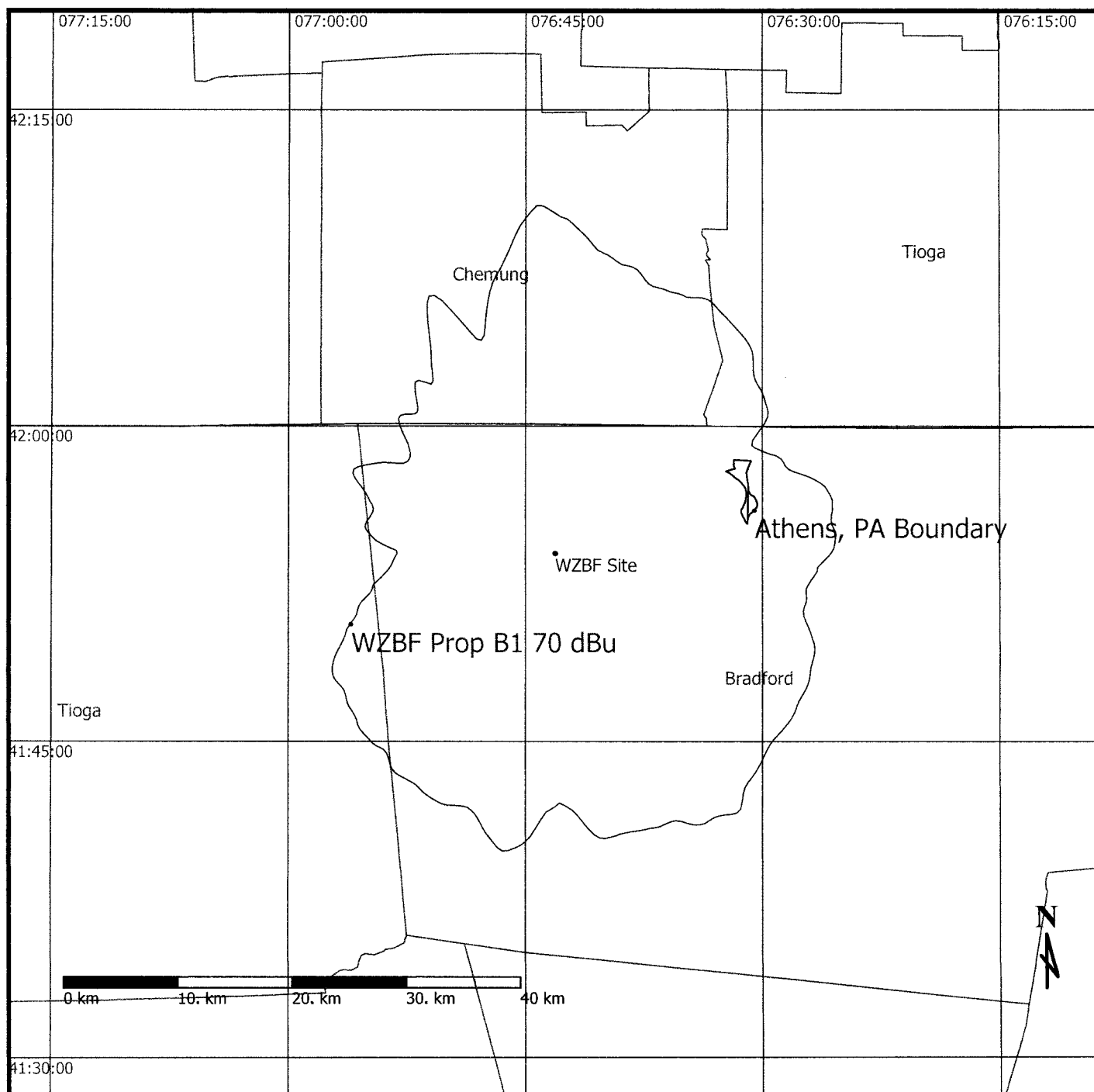
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Key:

City Grade

Protected

2nd/3rd Adj



## EXHIBIT 6

Kevin Fitzgerald  
 Job: WLIH CH245 Allot.fmj  
 Master Database: 2019\_Apr\_17.fmd  
 Lat: N41:46:13 Lon: W077:12:08 NAD-27  
 Channel: 245 Class: A  
 Status: Licensed, Construction Permit, Application  
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
 Range: 100 km  
 Comments: No Comments  
 Description: WLIH, 96.9, Whitneyville, PA; Allotment Spacing; WZBF to Change Channel to  
 Channel 296B1

Page 1 of 1  
 Date: 4/22/2019 12:35:53 AM  
 rfInvestigator Version 3.8.16  
 by rfSoftware, Inc.

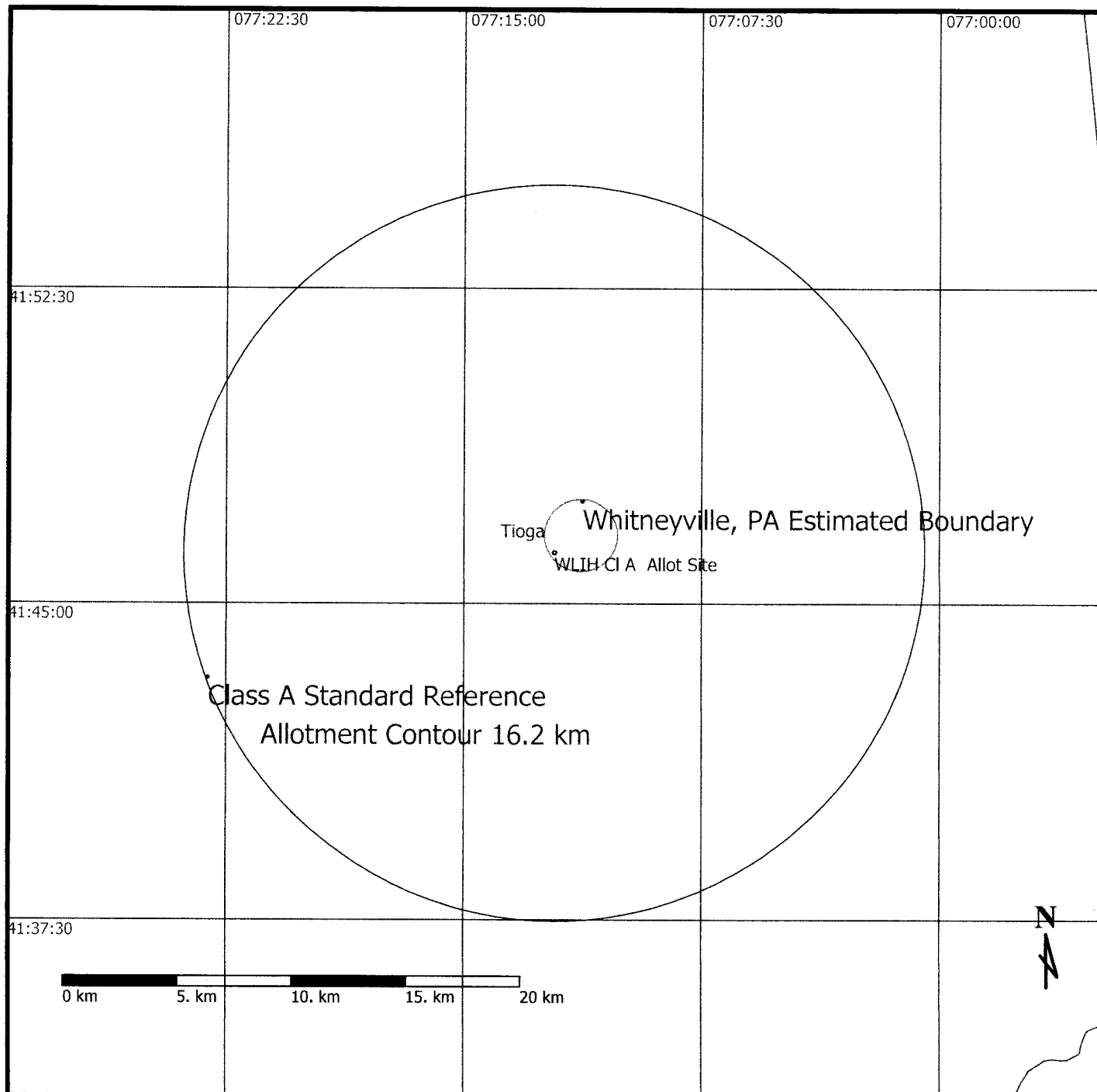
Callsign	City	Stat	Ser	Channel	Cla	Stat	73	207	73	207	ERP	HAAT	Adjacency	Distanc	Bear	Latitude (NAD27)	Longitude (N	73	215
WZBF	RIDGEBURY PA	FM	245	: 96.9 MA	LIC	115		-72.39	3.20	140	Co-Chan	42.61	070	N41:53:55	W076:43:08	-49.39			
WZHD	CANASERA NY	FM	246	: 97.1 MA	LIC	72		7.72	3.90	95	1st Adj	79.72	332	N42:24:06	W077:39:37	30.72			
WGRF	BUFFALO NY	FM	245	: 96.9 MB	LIC	178		12.55	24.00	217	Co-Chan	190.55	314	N42:57:13	W078:52:36	47.55			
WJSA-FM	JERSEY SH PA	FM	242	: 96.3 MB1	LIC	48		13.66	2.65	306	3rd Adj	61.66	193	N41:13:45	W077:22:02	19.66			
WLAN-FM	LANCASTER PA	FM	245	: 96.9 MB	LIC	178		23.33	50.00	152	Co-Chan	201.33	162	N40:02:52	W076:27:25	58.33			
WPGM-F	DANVILLE PA	FM	244	: 96.7 MA	LIC	72		30.73	0.57	233	1st Adj	102.73	148	N40:59:16	W076:32:51	53.73			
WAGL	PORTVILLE NY	FM	244	: 96.7 MA	LIC	72		33.72	0.46	155	1st Adj	105.72	287	N42:03:04	W078:25:11	56.72			
WYXL	ITHACA NY	FM	247	: 97.3 MB	LIC	69		34.23	26.00	268	2nd Adj	103.23	042	N42:27:54	W076:22:23	40.23			
WECW	ELMIRA NY	FM	299	: 107.7 DM	LIC	6		42.34	0.01	-103	IF	48.34	041	N42:05:48	W076:49:00	42.34			
WPEL-FM	MONTROSE PA	FM	243	: 96.5 MB	LIC	69		42.61	57.00	140	2nd Adj	111.61	085	N41:51:16	W075:51:50	48.61			
WOUR	UTICA NY	FM	245	: 96.9 MB	LIC	178		48.03	19.50	241	Co-Chan	226.03	047	N43:08:46	W075:10:40	83.03			
WOWY	UNIVERSITY PA	FM	246	: 97.1 MA	LIC	72		51.56	2.00	123	1st Adj	123.56	210	N40:48:27	W077:56:29	74.56			
WBHT	MOUNTAIN TPA	FM	246	: 97.1 MA	LIC	72		56.88	0.50	336	1st Adj	128.88	120	N41:10:57	W075:52:19	79.88			
WZBF-FM	TOWANDA PA	FM	245	: 96.9 MDB	LIC	0		63.90	0.00	0	Co-Chan	63.90	088	N41:47:33	W076:26:03	63.90			
WDDH	ST. MARYS PA	FM	248	: 97.5 MB	LIC	69		65.41	19.50	244	3rd Adj	134.41	263	N41:37:04	W078:48:14	71.41			
WVNW	BURNHAM PA	FM	244	: 96.7 MA	LIC	72		65.84	0.45	259	1st Adj	137.84	197	N40:35:10	W077:41:40	88.84			
WCMF-F	ROCHESTE NY	FM	243	: 96.5 MB	LIC	69		85.81	48.00	142	2nd Adj	154.81	348	N43:08:05	W077:35:07	91.81			
WRVV	HARRISBUR PA	FM	247	: 97.3 MB	LIC	69		91.71	15.00	260	2nd Adj	160.71	170	N40:20:43	W076:52:09	97.71			
WRRK	BRADDOCK PA	FM	245	: 96.9 MB	LIC	178		96.50	45.00	162	Co-Chan	274.50	237	N40:24:42	W079:55:53	131.50			
WBB1	ENDWELL NY	FM	298	: 107.5 A	LIC	10		97.75	2.20	166	IF	107.75	068	N42:08:17	W075:59:59	97.75			

## EXHIBIT 7

## Contour Analysis

Kevin Fitzgerald  
Job: WLIH CH245 Allot.fmj  
Master Database: 2019\_Apr\_30.fmd  
Lat: N41:46:13 Lon: W077:12:08 NAD-27  
Scale: 1:250000  
Channel: 245 Class: A  
Status: Licensed, Construction Permit, Application  
Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
Range: 100 km, Clearance: -0.5km  
Comments: No Comments  
Description: WLIH, 96.9, Whitneyville, PA; Class A, Standard Reference Allotment Contour 16.2 km

rfInvestigator Version 3.8.16  
by rfSoftware, Inc.  
Date: 5/1/2019 4:28:07 PM  
Key:  
City Grade  
Protected  
2nd/3rd Adj



## EXHIBIT 8



Kevin Fitzgerald

Job: WLIH CH245 Col.fmj

Master Database: 2019\_Apr\_30.fmd

Lat: N41:46:13 Lon: W077:12:08 NAD-27

Channel: 245 Class: A

Status: Licensed, Construction Permit, Application

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 100 km

Comments: No Comments

Description: WLIH, 96.9, Whitneyville, PA; Class A, Site Spacing Study

Page 1 of 1

Date: 5/1/2019 12:49:26 AM

rfInvestigator Version 3.8.16

by rfSoftware, Inc.

Call sign	City	Stat	Ser	Channel	Cla	Stat 73	207	73	207	ERP	HAAT	Adjacency	Distanc	Bear	Latitude (NAD27)	Longitude (N	73	215
WZBF	RIDGEBURY PA	FM	245	: 96.9 MA	LIC	115		-72.39		3.20	140	Co-Chan	42.61	070	N41:53:55	W076:43:08	-49.39	
WZHD	CANASERA NY	FM	246	: 97.1 MA	LIC	72		7.72		3.90	95	1st Adj	79.72	332	N42:24:06	W077:39:37	30.72	
WGRF	BUFFALO NY	FM	245	: 96.9 MB	LIC	178		12.55		24.00	217	Co-Chan	190.55	314	N42:57:13	W078:52:36	47.55	
WJSA-FM	JERSEY SH PA	FM	242	: 96.3 MB1	LIC	48		13.66		2.65	306	3rd Adj	61.66	193	N41:13:45	W077:22:02	19.66	
WLAN-FM	LANCASTER PA	FM	245	: 96.9 MB	LIC	178		23.33		50.00	152	Co-Chan	201.33	162	N40:02:52	W076:27:25	58.33	
WPGM-F	DANVILLE PA	FM	244	: 96.7 MA	LIC	72		30.73		0.57	233	1st Adj	102.73	148	N40:59:16	W076:32:51	53.73	
WAGL	PORTVILLE NY	FM	244	: 96.7 MA	LIC	72		33.72		0.46	155	1st Adj	105.72	287	N42:03:04	W078:25:11	56.72	
WYXL	ITHACA NY	FM	247	: 97.3 MB	LIC	69		34.23		26.00	268	2nd Adj	103.23	042	N42:27:54	W076:22:23	40.23	
WECW	ELMIRA NY	FM	299	: 107.7 DM	LIC	6		42.34		0.01	-103	IF	48.34	041	N42:05:48	W076:49:00	42.34	
WPEL-FM	MONTROSE PA	FM	243	: 96.5 MB	LIC	69		42.61		57.00	140	2nd Adj	111.61	085	N41:51:16	W075:51:50	48.61	
WOUR	UTICA NY	FM	245	: 96.9 MB	LIC	178		48.03		19.50	241	Co-Chan	226.03	047	N43:08:46	W075:10:40	83.03	
WOWY	UNIVERSITY PA	FM	246	: 97.1 MA	LIC	72		51.56		2.00	123	1st Adj	123.56	210	N40:48:27	W077:56:29	74.56	
WBHT	MOUNTAIN TPA	FM	246	: 97.1 MA	LIC	72		56.88		0.50	336	1st Adj	128.88	120	N41:10:57	W075:52:19	79.88	
WZBF-FM	TOWANDA PA	FM	245	: 96.9 MDB	LIC	0		63.90		0.00	0	Co-Chan	63.90	088	N41:47:33	W076:26:03	63.90	
WDDH	ST. MARYS PA	FM	248	: 97.5 MB	LIC	69		65.41		19.50	244	3rd Adj	134.41	263	N41:37:04	W078:48:14	71.41	
WVNW	BURNHAM PA	FM	244	: 96.7 MA	LIC	72		65.84		0.45	259	1st Adj	137.84	197	N40:35:10	W077:41:40	88.84	
WCMF-FM	ROCHESTE NY	FM	243	: 96.5 MB	LIC	69		85.81		48.00	142	2nd Adj	154.81	348	N43:08:05	W077:35:07	91.81	
WRVV	HARRISBUR PA	FM	247	: 97.3 MB	LIC	69		91.71		15.00	260	2nd Adj	160.71	170	N40:20:43	W076:52:09	97.71	
WRRK	BRADDOCK PA	FM	245	: 96.9 MB	LIC	178		96.50		45.00	162	Co-Chan	274.50	237	N40:24:42	W079:55:53	131.50	
WBBi	ENDWELL NY	FM	298	: 107.5 A	LIC	10		97.75		2.20	166	IF	107.75	068	N42:08:17	W075:59:59	97.75	

## EXHIBIT 9

## Contour Analysis

Kevin Fitzgerald  
Job: WLIH CH245 Col.fmj  
Master Database: 2019\_Apr\_30.fmd  
Lat: N41:46:13 Lon: W077:12:08 NAD-27  
Scale: 1:250000  
Channel: 245 Class: A  
Status: Licensed, Construction Permit, Application  
Channels:  
Range: 100 km, Clearance: -0.5km  
Comments: No Comments  
Description: WLIH, 96.9, Whitneyville, PA; Class A, 3.3 kw 70 dBu Coverage

rfInvestigator Version 3.8.16  
by rfSoftware, Inc.  
Date: 5/1/2019 12:47:45 AM  
Key:  
City Grade  
Protected  
2nd/3rd Adj

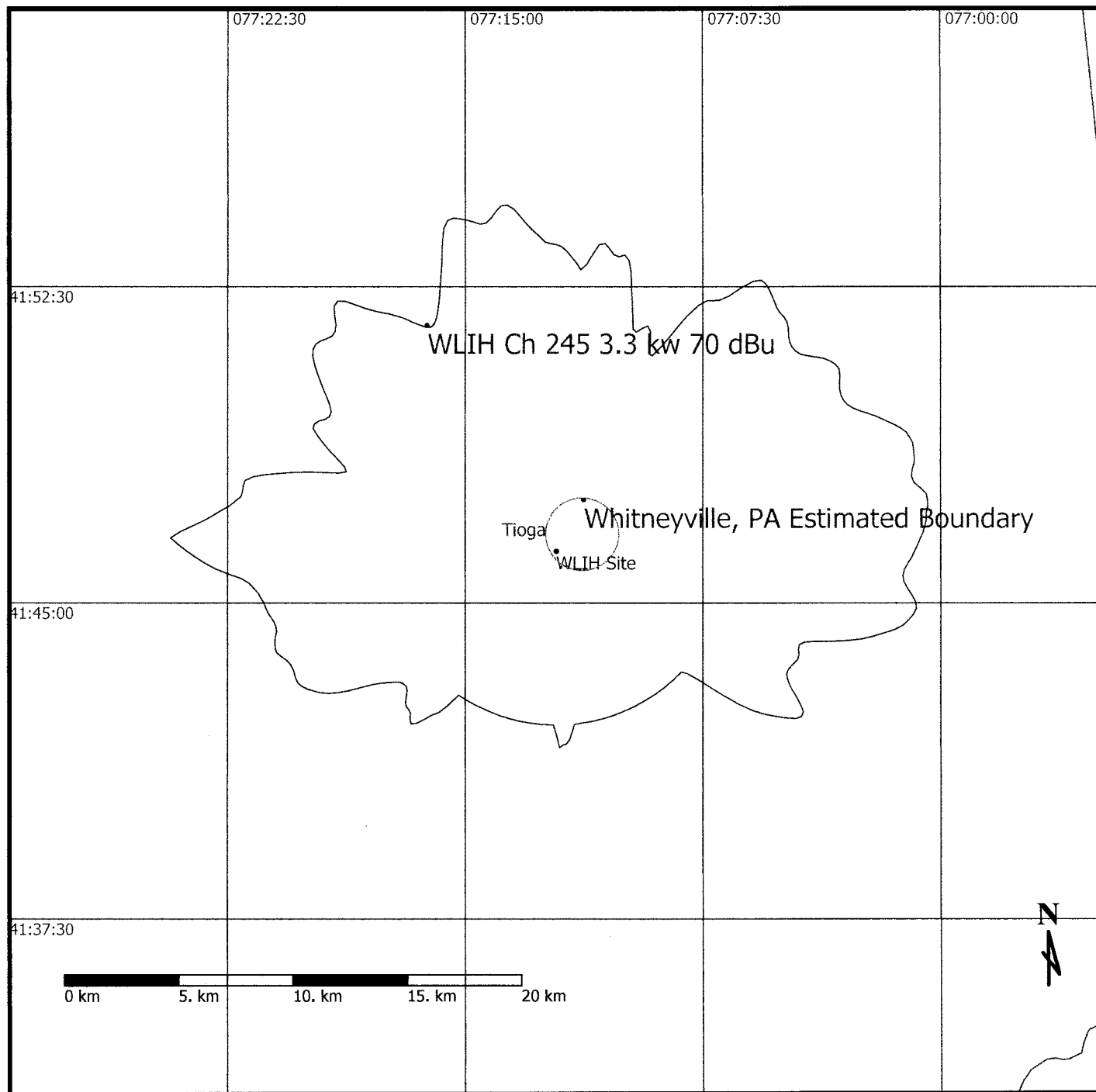


EXHIBIT 10

## EXHIBIT 10; WZBF, CHANNEL 296B1, ATHENS, PA

### RURAL RADIO ALTERNATE SITES STUDY NARRATIVE

This study reviews the possible sites where the WZBF Proposed Class B1 facility could be built. It includes sites that adhere to required minimum spacings to other Co-Channel, first, second, third, and IF adjacent channels. Facilities that could be short spaced that can utilize a directional antenna to protect a short spaced station have also been considered. Only sites that can provide the required 70 dBu service to the new proposed community of license, Athens, PA, are included on the contour study map. This study looks at the population covered in the Elmira, NY Urbanized Area using the 2010 US Census data.

#### I. Current WZBF Transmitter Site – Fully Spaced Site, Non-Directional Operation

13 Kw at 139.7m HAAT – 70 dBu covers 29 percent of the Elmira, NY Urbanized Area Population

#### II. W297BG Site (Round Top Athens) – Fully Spaced Site, Non-Directional Operation

12 Kw at 144.4m HAAT – 70 dBu covers 46 percent of the Elmira, NY Urbanized Area Population

#### III. WAVR, Waverly, NY Site – Short Spaced Site, Requires Directional Operation, Must

Protect WSYR-FM, Solvay, NY; 1<sup>st</sup> Adjacent; 17 Kw at 121m HAAT

70 dBu covers 0 percent of the Elmira, NY Urbanized Area Population

#### IV. Waverly NY Cell Site (ASR 1006276) – Short Spaced Site, Requires Directional Operation,

Must protect WSYR-FM, Solvay, NY; 1<sup>st</sup> Adjacent; 7.3 Kw at 182.1m HAAT

70 dBu covers 27 percent of the Elmira, NY Urbanized Area Population

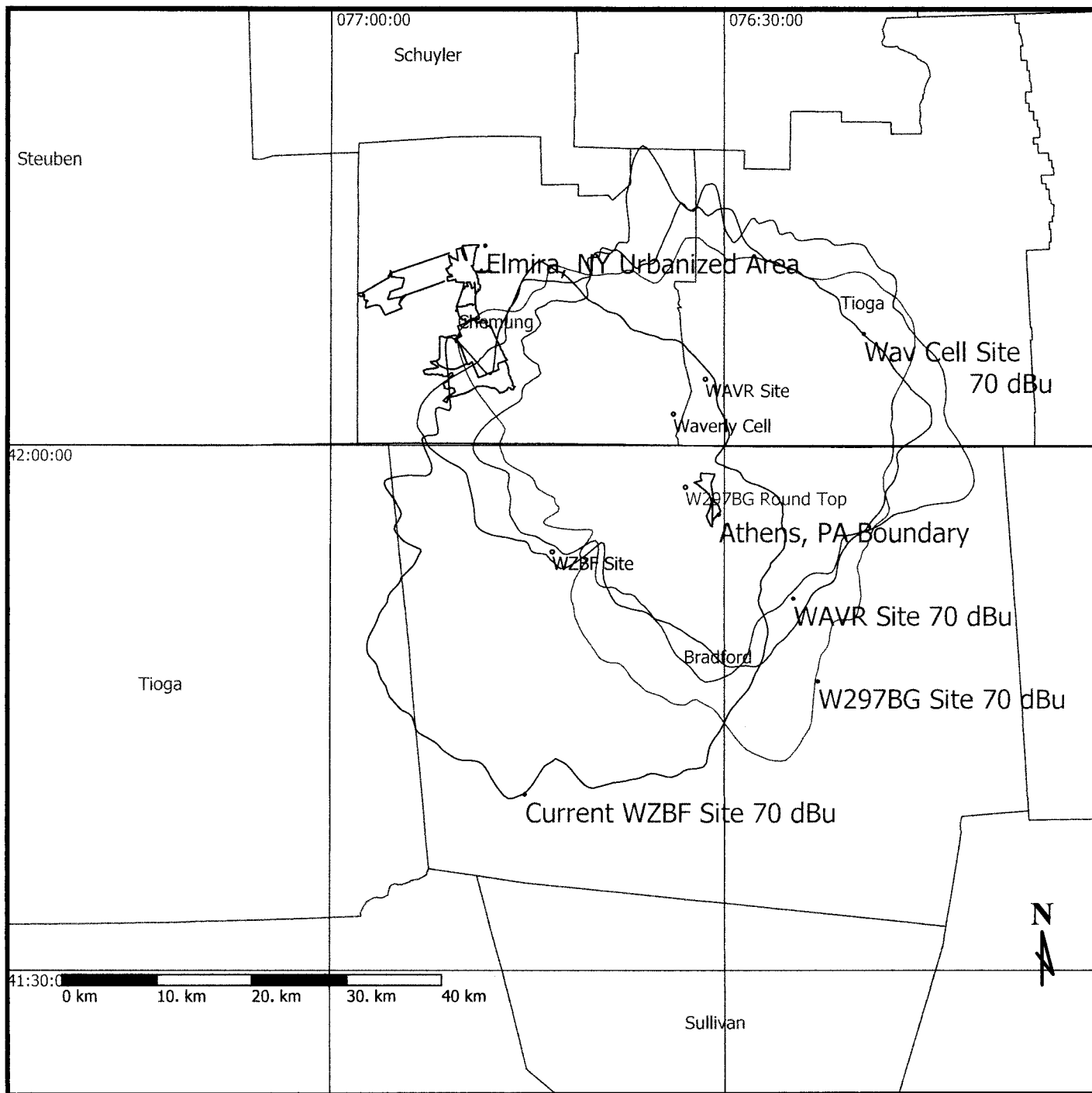
Included as Exhibit 11 is a Contour Study showing coverage contours for the above stations and their relationship to the Elmira, NY Urbanized Area.

Two other sites were reviewed but could not provide Athens, PA with 70 dBu service. The first of these was ASR 1218017 Chemung, NY near Wilawanna, PA. This site would only allow for WZBF to operate at -92m HAAT and is badly shadowed to most locations. The second site that could not provide 70 dBu service to Athens, PA was ASR 1006946 (Comfort Hill, WLVY, Elmira, NY). This site was too far from Athens, is terrain obstructed into Athens, and is short-spaced to WNBL, South Bristol, NY (1<sup>st</sup> Adjacent) requiring use of a Directional Antenna.

## EXHIBIT 11

10

rfInvestigator Version 3.8.16  
by rfSoftware, Inc.  
Date: 5/12/2019 8:44:06 PM  
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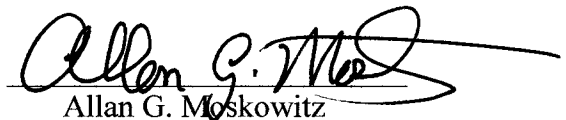


## CERTIFICATE OF SERVICE

I, Allan G. Moskowitz, hereby certify that on this 14th day of May, 2019, copies of the foregoing "Petition For Rulemaking" are being served by U.S. first-class mail postage prepaid, or by electronic mail\*, upon the following:

George Buickus, Jr.  
Good Christian Radio Broadcasting, Inc.  
P.O. Box 97  
Wellsboro, P.O. 16901

Nazifa Sawez  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554



Allan G. Moskowitz