

## FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20541

AUG 05 1993

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IN REPLY REFER TO  
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John C. Quale, Esq.  
James R. Bayes, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Dear Messrs. Quale and Bayes:

This is in response to the petition for rule making which you submitted on behalf of MetroCities Communications, Inc., licensee of Station WWSF-FM, Channel 251C1, Andalusia, Alabama, seeking to change the community of license for Station WWSF-FM from Andalusia to Wright, Florida. You state that the proposal would be consistent with the Commission's allotment priorities since it could provide a first local transmission service to Wright and would not leave Andalusia unserved.

Based on the information provided in the petition, we are unable to make an initial determination that the proposal would result in a preferential arrangement of allotments. Although the proposal would not deprive Andalusia of its only local aural transmission service, and would provide a first local aural transmission service to Wright, we note that Wright is located within the Fort Walton Beach, Florida, Urbanized Area.

As we stated in Modification of FM and TV Authorizations to Specify a New Community of License, ("Community Modifications, II"), 5 FCC Rcd 7097 (1990), proposals to award a first local service preference to a community in an Urbanized Area must be evaluated pursuant to the criteria enumerated in RKO General, Inc. ("KFRC"), 5 FCC Rcd 3222 (1990), and Faye and Richard Tuck ("Tuck"), 3 FCC Rcd 5374 (1988). In such instances the Commission relies primarily on three distinct criteria to determine if a first local service preference is warranted. The first is signal population coverage, which refers to the degree to which the proposed station could provide service not only to the suburban community, but to the adjacent metropolis also. Second, the Commission examines the size of the suburban community relative to the central city, its proximity to the city, and whether the suburban community is within the Urbanized Area of the central city. Third, we examine the interdependence of the suburban community with the central city, looking at various evidence related to work patterns, media and community services and the opinion of suburban residents. As your proposal includes no information which enables us to determine for comparative purposes whether Wright is deserving of a first local service preference or whether that community should be credited with all of the aural services authorized in the Fort Walton Beach Urbanized Area, it is unacceptable for consideration at this time.

If you wish to pursue the proposal, you may resubmit it in accordance with the criteria set forth above.

Sincerely,

Michael C. Ruger  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

bcc: FCC Reference Center (Room 239) via Secretary's Office (Room 222) (2 copies) (petition filed 7/22/93)

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