COUNTRY · 1440 AM

KODL

P.O. BOX 741 • THE DALLES • OREGON • 97058 • (503) 296-2101

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Elwyn T Wynn President
Larson-Wynn, Inc
PO Box 741
The Dalles, Oregon 97058

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December 5, 1993
Secretary
Federal Communications Commission
1919 M. Street N.W.
Washington, D.C. 20554

RE: PETITION FOR RULE MAKING

Gentlemen:

1. I, Elwyn T Wynn, President of Larson-Wynn, Inc. licensee of KODL AM, The Dalles, Oregon, submit for your approval, a "Petition for Rule Making" to the FCC to add FM channel 224C3 (92.7 Mhz.) to the City of The Dalles, Oregon. This would be the third local FM service assigned to the City of The Dalles.

2. If you agree with our proposal, the FM Table of Allotments, Section 73.202 (b) of the Rules, would be changed to read:

City	Present	Proposed
The Dalles, Oregon	249C2, 283C	224C3, 249C2, 283C

3. The allocation point as noted on the enclosed engineering study is the current transmitter sit of our AM station, KODL. Since The Dalles is located with 320 kilometer (200 miles) of the U.S.-Canadian border, concurrence must be obtained from the Canadian government.

4. Included with this petition are one original and ~~four~~ FIVE copies of an engineering statement by Ken Williams Jr., P.E. that shows that Channel 224C3 can be assigned to The Dalles, Oregon without being short-spaced to any co-channel or adjacent station.

5. If you assign Channel 224C3 to The Dalles, it is the intention of Larson-Wynn, Inc to apply for the construction permit and if awarded to us to build and operate the Station.

6. Please address any communication regarding this Petition to:

Elwyn T Wynn, President, Larson-Wynn, Inc
Radio Station KODL AM
PO Box 741
The Dalles, Oregon 97058
Phone 503-296-2101

Thank you for your help in this matter.

Very truly yours,

Elwyn T. Wynn

Elwyn T. Wynn
Enclosures

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ENGINEERING EXHIBITS

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ENGINEERING EXHIBITS
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A REQUEST TO AMEND SECTION
73.202(b), FOR ALLOCATION OF
FM CHANNEL 224C3 TO
The Dalles, Oregon

****

APPLICANT:
Larson-Wynn, Inc., (KODL)
The Dalles, Oregon

KENNETH WILLIAMS, Jr., P.E.
CONSULTING ENGINEER
P.O. BOX 7703
TACOMA, WA 98407

(206) 756-7544

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ENGINEERING STATEMENT IN SUPPORT OF PROPOSAL TO ADD FM CHANNEL 224C3 TO THE DALLES, OREGON

The following Engineering data supports a request of Larson-Wynn, Inc. (KODL), The Dalles, Oregon to amend the Table of FM Allotments. Allotment of channel 224C3 to The Dalles, Oregon is proposed.

The addition of channel 224C3 may be made as a drop in channel without other channels being moved, deleted or changed, in the current Table of FM Allotments

As proposed herein channel 224C3 will not be in conflict with any presently assigned or allotted channels. Results of this assignment will not cause short spacing to existing or proposed stations in the U.S. or Canada, thus permitting us to request change in the Table of FM Allotments in section 73.202(b) of the Commission's Rules.

THE PROPOSED CHANGE IN THE RULES ARE:

The Dalles, Oregon

Existing	Proposed
249C2, 283C	224C3, 249C2, 283C

Channel 224 was previously allocated to Toppenish, Washington. The channel was deleted, when channel 225C2 was allotted to Toppenish.

Coordinates of the restricted site at The Dalles, Oregon, were determined as: N. 45° 35' 31", W. 121° 11' 57".

CHANNEL SPACING DISTANCE

All distance figures used in this report are metric and distance calculations were made using methods specified in Section 73.208 of the FCC Rules. The distance between stations is shown as the last entry to the right, under (km). The distance clear or short is shown under [MARGIN] of the Figure No. 1 C3 FM CHANNEL STUDY. This distance and bearing data was added to a current FCC data base.

As shown on Figure No.1 on the following pages, all channel spacings are greater than the Commission's current minimum channel separation requirements at the petitioner's proposed transmitter site.

Another consideration were the 10.6-10.8 mHz. spacings. These channels, 277 and 278 were searched out to a distance of 200 km. Print out of this information is shown as figure No.2. No short spacing results on channels spaced 10.6-10.8 mHz. (Channels 277 & 278) from our proposal on 224C3.

Due to the proposed site is close in to the city of license, all areas of the city are well within the 70 dbu contour.

Shown on the following pages are Figures or Exhibits which support our request for adding channel 224C3
to The Dalles, Oregon.

FIGURE No. 1

CLASS C3 FM CHANNEL STUDY
** CHANNEL 224 **

REFERENCE SITE - The Dales, OR N. 45 35 31 W. 121 11 57

CHANNEL & CLASS	CALL STATUS	Owner/Applicant CITY STATE	FILE No.	(m) Horz->AHAAT/ERP/AMSL Vert->AHAAT/ERP/AMSL	(kw)	(m)	LATITUDE LONGITUDE	(deg) AZIMUTH [	(km) DIST. MARGIN]
92.1 Mhz.		School District 4J, Lane County, Oregon							
221 A	KSDC	Oakridge		-249	3.1	545	43-44-34	205.5	227.6
FM	CP	OR	BPH 900417IA				122-26- 3	185.6 KM	CLEAR
92.1 Mhz.		School District 4J, Lane County, Oregon							
221 A	KSDC	Oakridge		-253	0.58	546	43-44-34	205.5	227.6
FM	LIC	OR	BMLED 920207KA	-253	0.58	546	122-26- 3	185.6 KM	CLEAR
92.3 Mhz.		Hartline Broadcasters							
222 C2		Ephrata					47-19- 0	33.4	229.8
FR	DEL	WA	RM 8265				119-33- 0	173.8 KM	CLEAR
92.3 Mhz.		TRMR, Inc.							
222 C2	NEW	Ephrata		-63	50.	401	47-21-22	33.9	236.3
FM	APP	WA	BPH 920728MC	-63	50.	401	119-28-52	180.3 KM	CLEAR
92.3 Mhz.		B & G Enterprises							
222 C2	KULEFM	Ephrata		120	20.0	630	47-19-13	33.0	229.1
FM	APP	WA	BPH 930607IF	120	20.0	630	119-34-22	173.1 KM	CLEAR
92.3 Mhz.		Ksgo/KGON, Inc.							
222 C	KGON	Portland		386	97.	480	45-29-20	264.4	117.3
FM	LIC	OR	BLH 900820KF	386	97.	480	122-41-40	21.3 KM	CLEAR
92.3 Mhz.									
222 C2		Ephrata					47-19- 0	33.4	229.8
FA	VACA	WA					119-33- 0	173.8 KM	CLEAR
92.5 Mhz.		Bellevue Radio, Inc.							
223 C	KLSYFM	Bellevue		714	56.0	940	47-30-14	344.4	220.7
FM	LIC	WA	BLH 890918KA	714	56.0	940	121-58-29	44.7 KM	CLEAR
92.5 Mhz.		KMEX, Inc.							
223 C1	KZHR	Dayton		379	54.0	1137	45-59-19	79.4	239.2
FM	LIC	WA	BLH 920731KC	379	54.0	1137	118-10-28	95.2 KM	CLEAR
92.5 Mhz.		KMEX, Inc.							
223 A	KZHR	Dayton		-143	0.21	509	46-19-14	72.0	262.3
FM	CP	WA	BPH 890126MG	-143	0.21	509	117-58-46	173.3 KM	CLEAR
92.7 Mhz.		Charlotte McNaughton							
224 C2	KCLM	Newport					44-45-22	247.5	242.4
FR	ADD	OR	RM 8212				124- 2-54	65.4 KM	CLEAR

FIGURE No. 1 Cont.

C3 CHANNEL STUDY

CHANNEL & CLASS	CALL STATUS	Owner/Applicant CITY STATE	FILE No.	(m) Horz->AHAAT/ Vert->AHAAT	(kw) ERP/ ERP	(m) AMSL/ AMSL	LATITUDE LONGITUDE	(deg) AZIMUTH [	(km) DIST. MARGIN]
92.7 Mhz.									
224 A		Burns					43-34-22	143.8	278.0
FA	VACA	OR					119- 7-50	136.0 KM	CLEAR
92.7 Mhz.		Charlotte McNaughton							
224 C3		Newport					44-45-52	246.4	229.9
FR	DEL	OR	RM 8212				123-52-53	76.9 KM	CLEAR
92.7 Mhz.		Charlotte McNaughton							
224 C3	KCLM	Newport		144	12.0	305	44-45-52	246.4	229.9
FM	CP	OR	BPH 910118MB	144	12.0	305	123-52-53	76.9 KM	CLEAR
92.9 Mhz.		Youngs Bay Broadcasting							
225 C1	KASTFM	Astoria		165	99.	215	46-10-54	288.0	212.5
FM	LIC	OR	BLH 810526AL	165	99.	215	123-48-19	68.5 KM	CLEAR
92.9 Mhz.		Tad Broadcasting, Inc.							
225 C2	KHYT	Toppenish		257	17.0	629	46-30-15	31.6	119.1
FM	CP	WA	BPH 900305JN	257	17.0	629	120-23-33	2.1 KM	CLEAR
93.1 Mhz.		McKenzie River Broadcasting Company, Inc.							
226 C	KKNU	Springfield-Euge		300	100.	492	44- 0- 5	220.6	232.7
FM	LIC	OR	BLH 900406KB	300	33.	492	123- 6-48	136.7 KM	CLEAR
93.3 Mhz.		Cook Inlet Radio License Partnership, L.P.							
227 C	KUBE	Seattle		393	99.	518	47-32-39	342.2	227.9
FM	LIC	WA	BLH 831004AF	393	99.	518	122- 6-29	131.9 KM	CLEAR
93.3 Mhz.		Comcast Media Services, Inc.							
227 C1	KTELFM	Walla Walla		420	42.	1163	45-59-19	79.4	239.2
FM	LIC	WA	BLH 911202KA	420	42.	1163	118-10-28	163.2 KM	CLEAR

>>>>>> END OF CHANNEL 224 SEARCH <<<<<<

FIGURE No. 2

10.6-10.8 mHz CHANNEL SPACINGS

FM WITHIN 200 km
** CHANNELS 277 TO 278 **

REFERENCE SITE - The Dalles, OR N. 45 35 31 W. 121 11 57

CHANNEL & CLASS	CALL STATUS	Owner/Applicant CITY STATE	FILE No.	(m) Horz->AHAAT/ERP/AMSL Vert->AHAAT/ERP/AMSL	(kw)	(m)	LATITUDE LONGITUDE	(deg) AZIMUTH	(km) DIST
103.3 Mhz.		Trumper Communs. of Portland, Ltd.							
277 C	KKCW	Beaverton		504	95.	576	45-31-22	266.4	121.5
FM	LIC	OR	BLH 850708KO	504	95.	576	122-45-12		
103.3 Mhz.		Trumper Communs. of Portland, Ltd.							
277 C	KKCW	Beaverton		504	95.	576	45-31-22	266.4	121.4
FM	CP	OR	BPH 901220IC	504	95.	576	122-45- 7		

>> END OF FM WITHIN 200 km STUDY <<

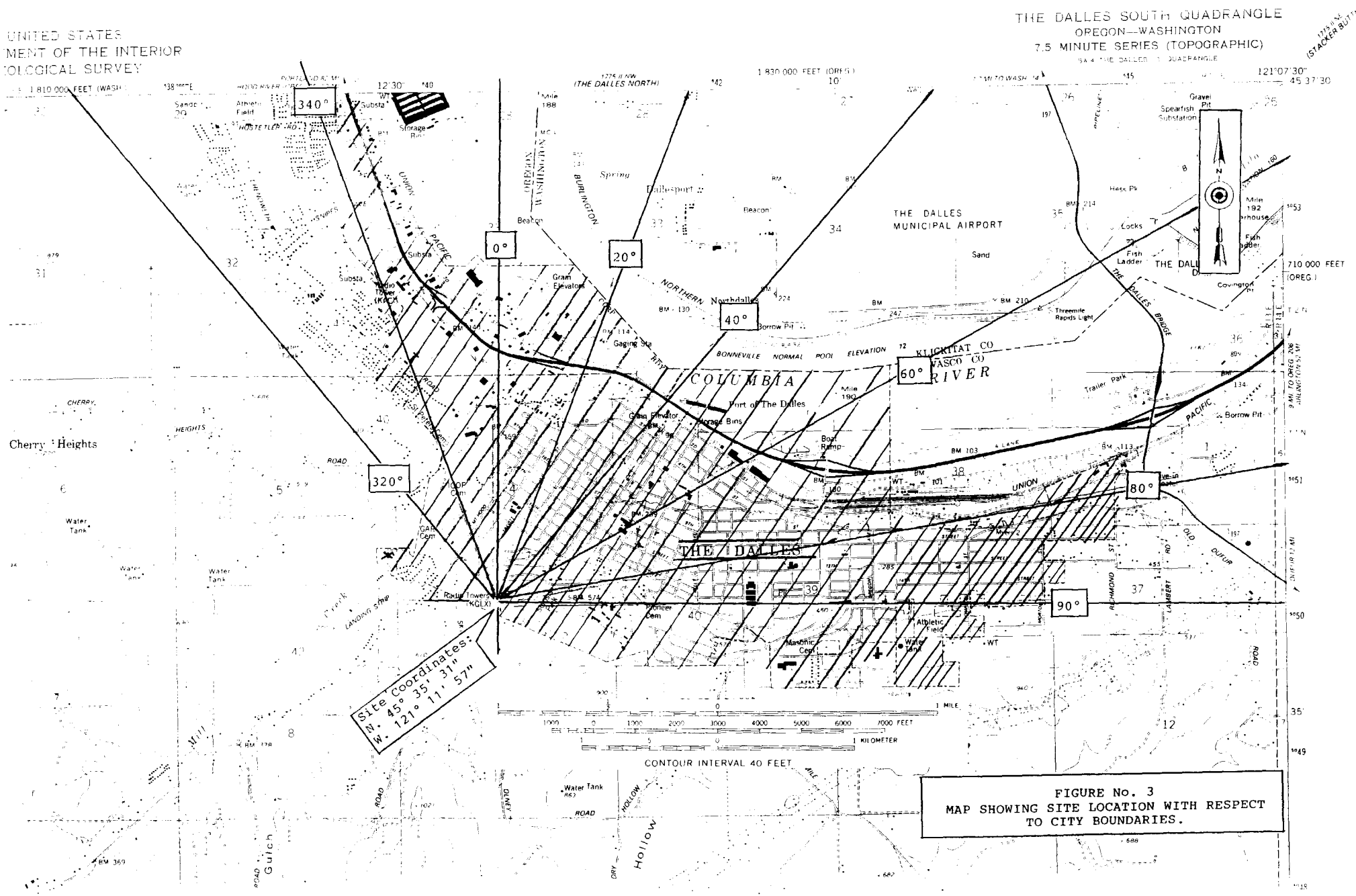


FIGURE No. 3
MAP SHOWING SITE LOCATION WITH RESPECT TO CITY BOUNDARIES.

FIGURE No. 4

SITE NDGC TERRAIN DATA
30-Second data

Average Elevation for 8 radials 359.1 meters

Starting point coordinates: 45 35 31 121 11 57

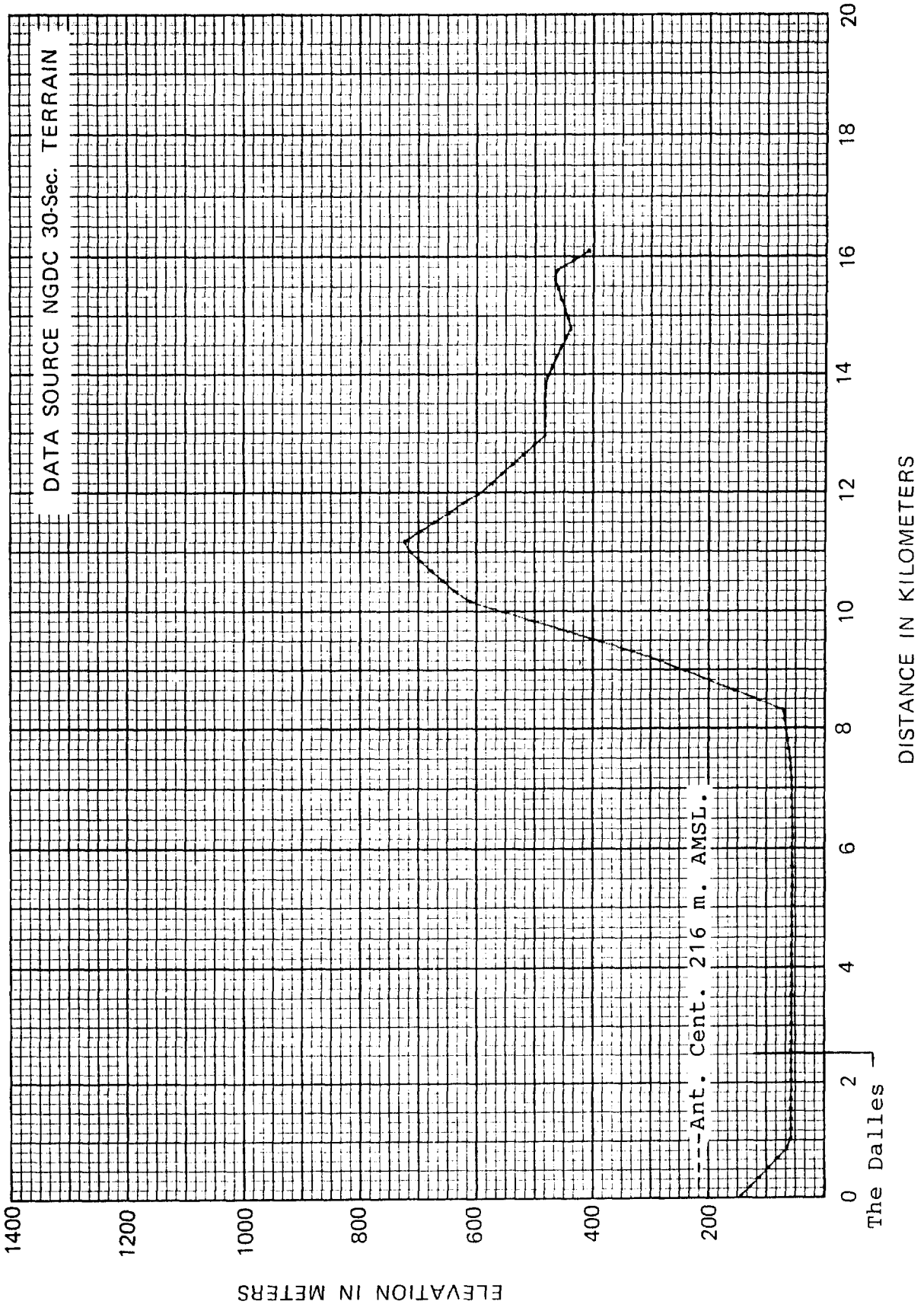
Maximum distance: 16.0 km Distance increment:

Azimuth	Endpoint Coordinates		3 - 16 km Average Elevation
.0	45.7359	121.1992	317.6 meters
45.0	45.6936	121.0535	238.7
90.0	45.5918	120.9935	216.4
135.0	45.4901	121.0540	326.7
180.0	45.4480	121.1992	461.0
225.0	45.4901	121.3443	560.1
270.0	45.5918	121.4048	435.8
315.0	45.6936	121.3449	316.3

Average of all radials: 359.1 meters

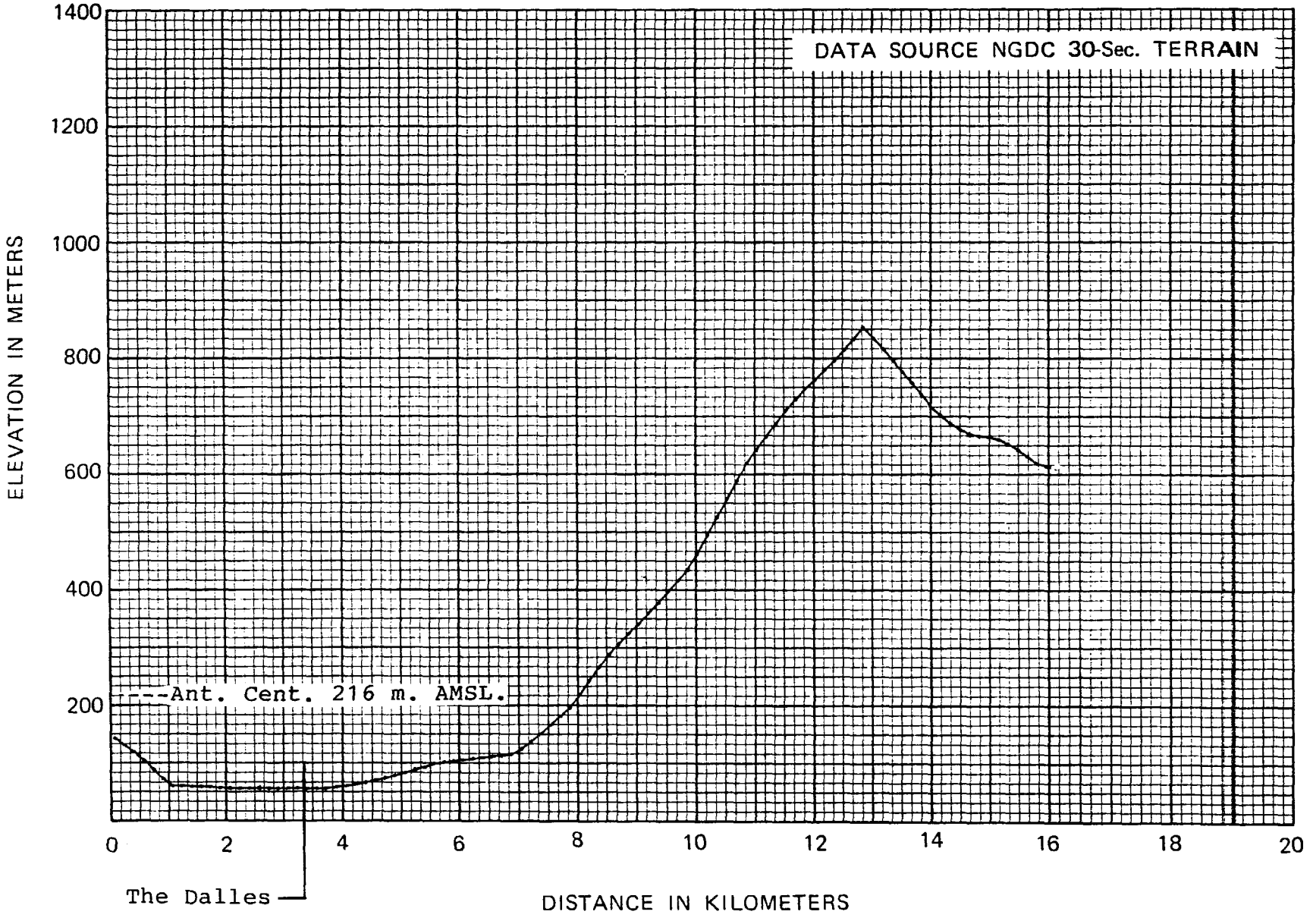
0° RADIAL

TERRAIN DATA THROUGH CITY



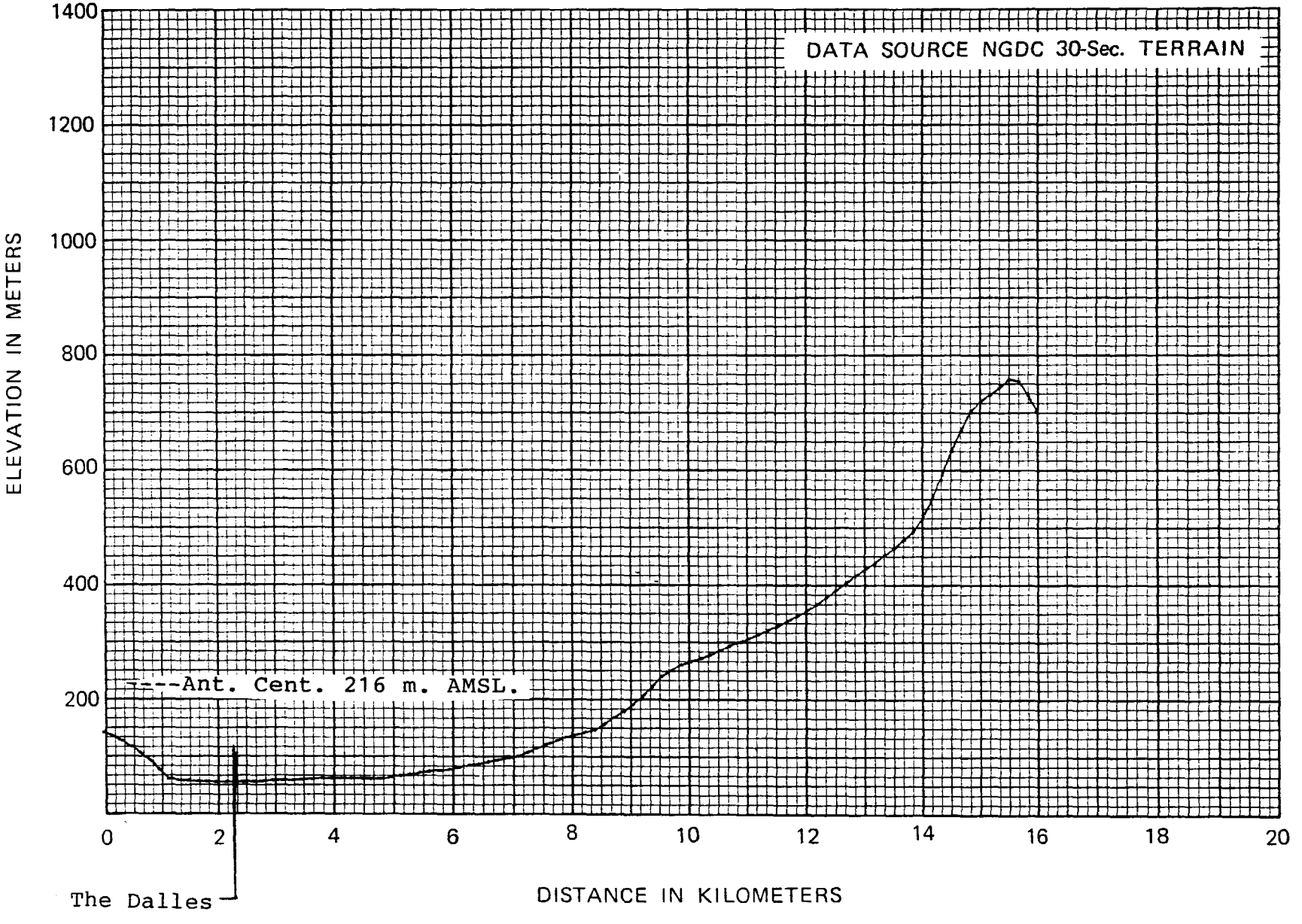
20° RADIAL

TERRAIN DATA THROUGH CITY



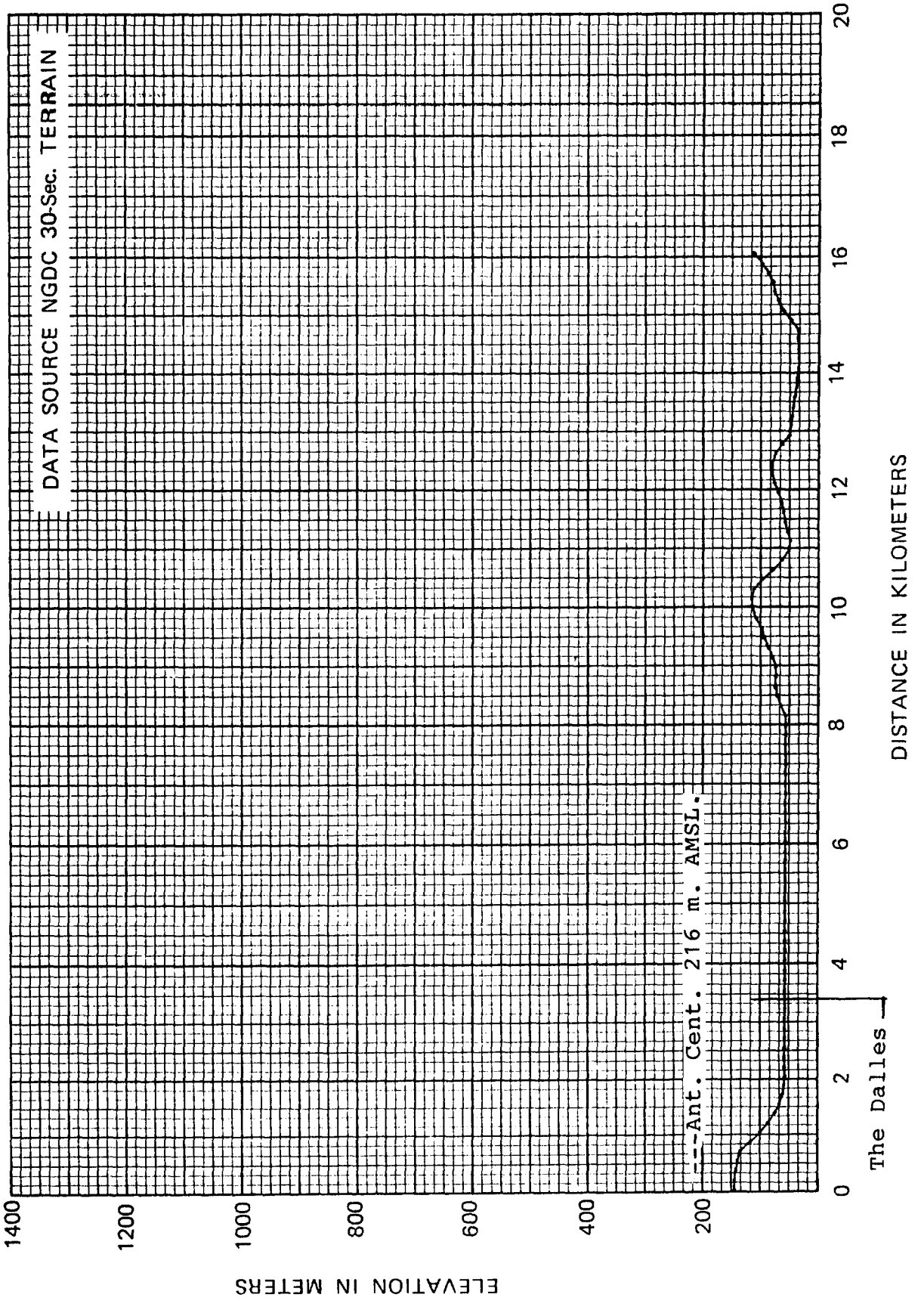
40° RADIAL

TERRAIN DATA THROUGH CITY



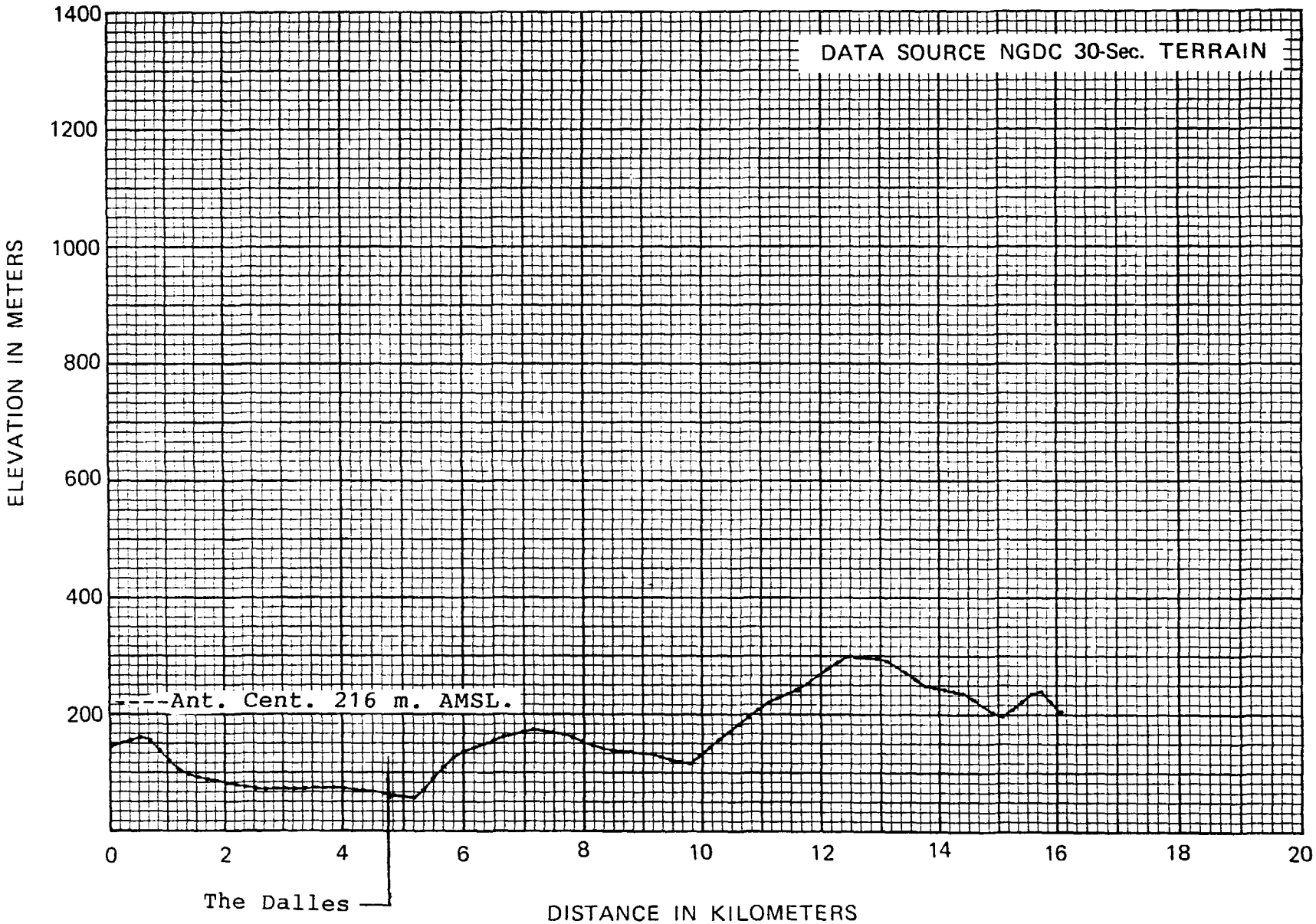
60° RADIAL

TERRAIN DATA THROUGH CITY

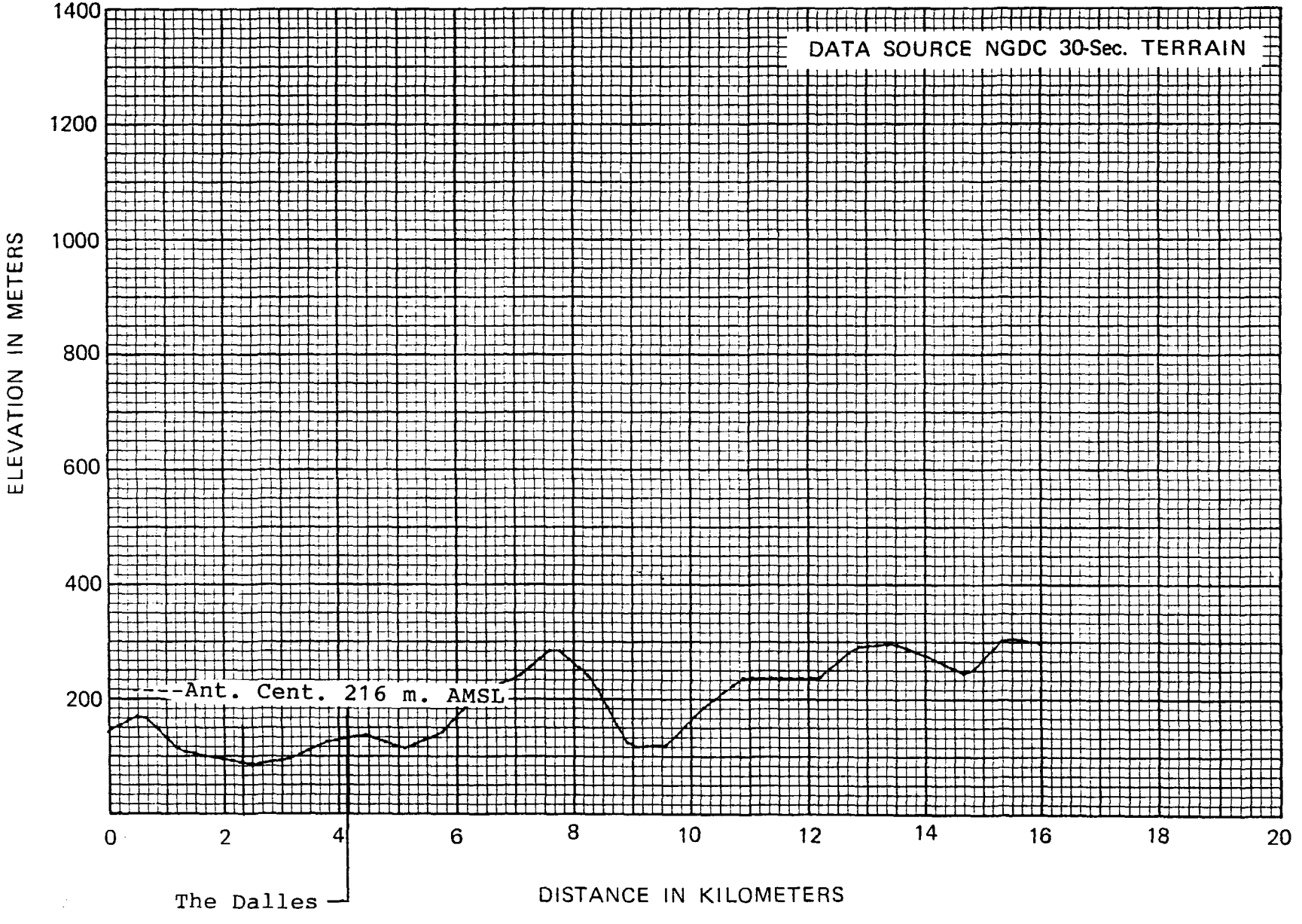


80° RADIAL

TERRAIN DATA THROUGH CITY



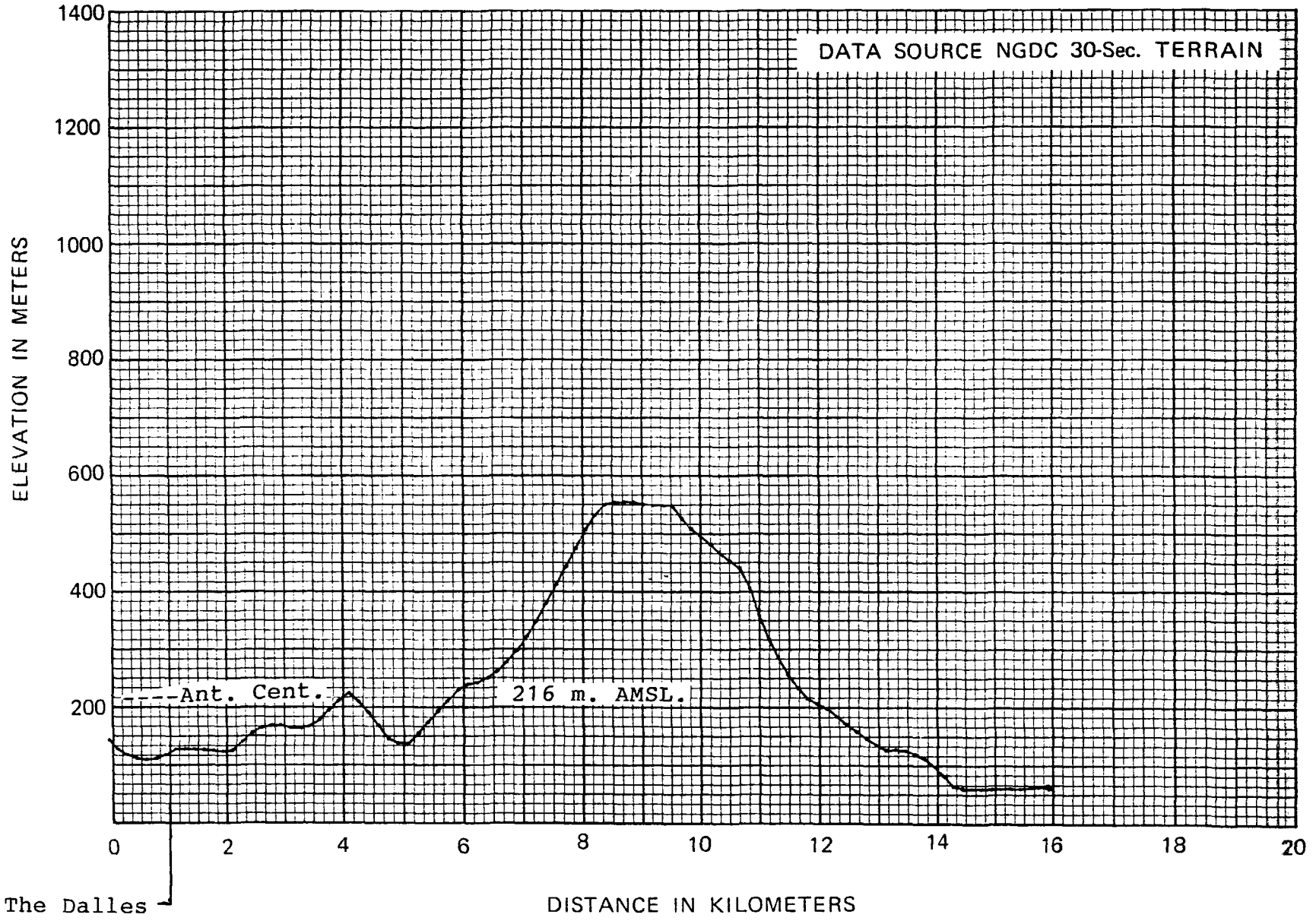
90° RADIAL



TERRAIN DATA THROUGH CITY

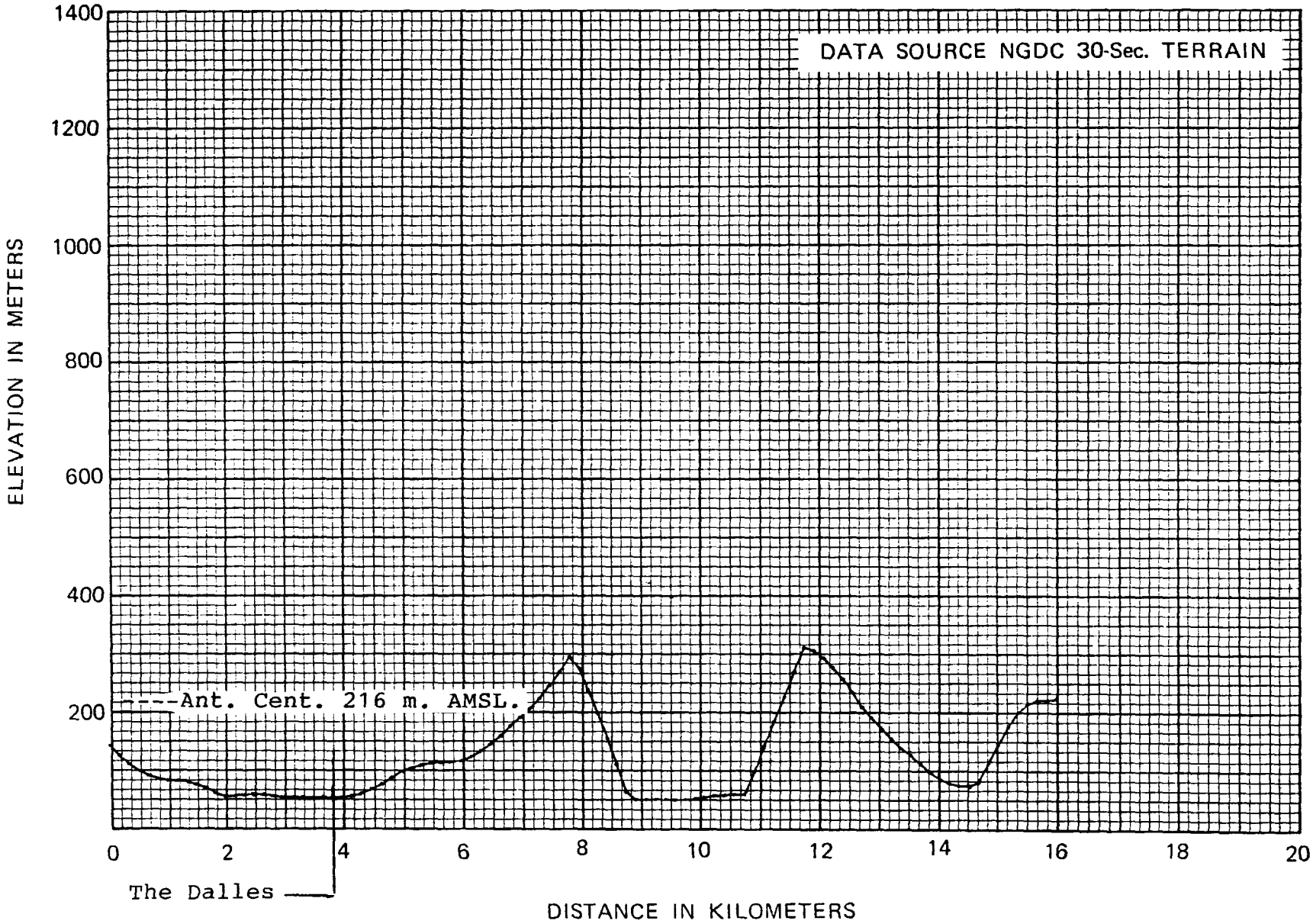
320° RADIAL

TERRAIN DATA THROUGH CITY



340° RADIAL

TERRAIN DATA THROUGH CITY'



ENGINEERS CERTIFICATION

STATE OF WASHINGTON)
) ss
COUNTY OF PIERCE)

Kenneth Williams, Jr., P.E., being duly sworn on his oath, states that he is an experienced and qualified Radio Engineer, licensed as a Registered Professional Electrical Engineer in the States of Washington and Oregon and as such maintains an office for the practice of Electrical and Communications Engineering. Having been in continuous practice as a Consulting Engineer for over 30 years, his qualifications are thus a matter of record with the Federal Communications Commission and the Federal Aviation Administration.

The Engineering data herein, was prepared by him or under his direct supervision and all representation of fact contained in said report is based on affiants measurements, information and belief and he believes all such statements herein to be true and correct.

(Kenneth Williams, Jr., P.E.)
(affiant)

ENGINEERS STATE SEAL

7-15-95

Sworn to before me, Lou Ann Jean Williams a Notary Public of Tacoma, Washington, on this 11th day of September, 1993.

My Commission Expires April 4, 1995.

NOTARY STATE SEAL:

OFFICIAL SEAL
LOU ANN JEAN WILLIAMS
Notary Public State of Washington
My Comm. Expires 4-4-95