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November 7, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

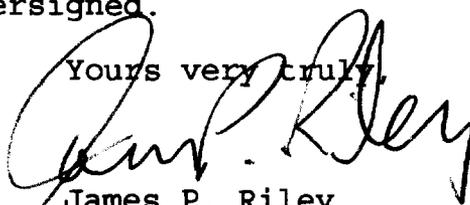
RE: MM Docket No. 94-100

Dear Mr. Caton:

Transmitted herewith on behalf of KYFM, Inc. is the original with four copies of its Comments and Counterproposal in the above-referenced proceeding concerning amendment of Section 73.202(b), the table of FM allotments.

Should further information be necessary, please communicate directly with the undersigned.

Yours very truly,



James P. Riley
Counsel for
KYFM, Inc.

JPR/rhw
Enclosure

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BEFORE THE

Federal Communications Commission

NOV 7 1994

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF GENERAL COUNSEL

In the Matter of)
)
 Amendment of Section 73.202(b),) MM DOCKET NO. 94-100
 Table of Allotments,)
 FM Broadcast Stations.)
 (Okmulgee, Nowata, and Pawhuska,)
 Oklahoma))

Directed to: Acting Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

KYFM Radio, Inc. ("KYFM"), licensee of Station KYFM(FM), Bartlesville, Oklahoma, by its attorneys, hereby respectfully submits its Counterproposal in the above-captioned proceeding. With respect thereto, the following is stated:

1. In the Commission's Notice of Proposed Rule Making, DA 94-984, released September 15, 1994, it sought comment on the following three options for changes in the FM Table of Allotments:

Channel No.

City	Present	Proposed
	Option I	
Okmulgee, Oklahoma	231C2	231C1
Nowata, Oklahoma	232A, 268A	268A, 286C3
Pawhuska, Oklahoma	285A	—
	Option II	
Okmulgee, Oklahoma	231C2	231C1
Nowata, Oklahoma	232A, 268A	268A, 285A
Pawhuska, Oklahoma	285A	280A

Option III

Okmulgee, Oklahoma	231C2	231C1
Nowata, Oklahoma	232A, 268A	268A, 285A
Pawhuska, Oklahoma	285A	—

2. Station KYFM(FM) currently operates on Channel 261A at Bartlesville, Oklahoma. It is the only FM station licensed to Bartlesville. KYFM now desires to upgrade its facilities to provide improved service and a wider coverage area to the citizens of Bartlesville and the surrounding area. Accordingly, KYFM counterproposes the following two alternative amendments to Section 73.207:

Option IV

Okmulgee, Oklahoma	231C2	231C1
Nowata, Oklahoma	232A, 268A	261A, 268A
Pawhuska, Oklahoma	285A	280A ¹
Bartlesville, Oklahoma	261A	286C3

Option V

Okmulgee, Oklahoma	231C2	231C1
Nowata, Oklahoma	232A, 268A	268A, 286C3
Pawhuska, Oklahoma	285A	280A ¹
Bartlesville, Oklahoma	261A	261C1
Ponca City, Oklahoma	257A, 261A, 265A	257A, 265A, 285A

3. Both of these options would provide improvements to the overall allotment scheme in the area and would allow KYFM to provide Bartlesville with its first wide-area coverage. See "Engineering Statement" attached hereto.

4. Option IV proposes the substitution of Channel 286C3

¹KYFM is proposing the allotment of Channel 280A to Pawhuska in the event that a party expresses an intention to apply for the Pawhuska channel.

for Channel 261A at Bartlesville and the substitution of Channel 261A for Channel 232A at Nowata.² This option also would provide wide area service to Okmulgee and would provide expanded service to Bartlesville. While KRIG(FM) at Nowata would remain a Class A facility, the community of Bartlesville has a greater need for its first expanded FM service. Moreover, KRIG, Inc., the licensee of KRIG(FM) has stated that it will accept a modification to another Class A channel. Notice of Proposed Rule Making, DA 94-984 at n. 1.

5. In Option IV the two communities receiving the upgrade would be Okmulgee and Bartlesville, while in Option I the two communities would be Okmulgee and Nowata. In choosing between the two communities, Bartlesville is clearly the community with the greater need for the upgraded service. Bartlesville is by far the larger community, with a population of 34,256, as opposed to Nowata's population of 3,896. 1990 Census of Population and Housing at Table 2. Furthermore, Nowata currently has two FM allotments, while Bartlesville has only one short-spaced FM allotment. Obviously, the much larger community, with only one short-spaced local FM station, is the community which has the greater need of the improved allocation and resulting wide area

²The proposed substitution of Channel 261A for Channel 232A at Nowata is mutually exclusive with KYFM(FM)'s continued operation on Channel 261A at Bartlesville. Accordingly, KYFM seeks to have its Channel 261A authorization modified to nonadjacent Channel 286C3 as an "incompatible channel swap." Clincho, Virginia, 6 FCC Rcd 3732, 3733 n.5 (1991); Caldwell, College Station and Gause, Texas, DA 94-890, released August 23, 1994.

coverage.

6. Additionally, implementation of Option IV would eliminate two "grandfathered" Class A allotments. KIXR(FM), Ponca City, and KYFM(FM) are currently short-spaced to each other, with both operating on Channel 261A. With KYFM(FM)'s change in channel from Channel 261A to Channel 286C3, this short-spacing will no longer exist. KIXR(FM) will become a fully-spaced Class A station and may be able to improve its service by increasing to 6 kW. Ponca City, in addition to Okmulgee and Bartlesville, would therefore also receive greater FM service. KYFM understands and accepts its obligation to reimburse KRIG(FM), Nowata, for its reasonable expenses associated with its change of channel pursuant to Option IV.

7. If the Commission were to decide not to adopt Option IV, Option V also would provide public service advantages. Option V proposes the substitution of Channel 231C1 for Channel 231C2 at Okmulgee, the substitution of Channel 286C3 for Channel 232A at Nowata, and the substitution of Channel 261C1 for Channel 261A at Bartlesville.

8. The change at Bartlesville also requires the substitution of Channel 285A for Channel 261A at Ponca City. See "Engineering Statement," attached hereto. Station KIXR(FM) currently operates on Channel 261A at Ponca City. It is currently limited to 3 kW at 328 feet, as a "grandfathered" Class A facility. KIXR(FM)'s current operation is short-spaced to the current operation of KYFM(FM) on Channel 261A. Likewise,

KIXR(FM) operating on Channel 285A would be limited to 3 kW at 328 feet, as it would be short-spaced to KASR-FM, which operates on Channel 286A at Perry, Oklahoma. Since KIXR(FM) already operates as a "grandfathered" Class A facility, the substitution of another channel which is likewise limited to 3 kW constitutes an equivalent class substitution.

9. Moreover, the proposed changes would provide a preferable overall allotment scheme. Pursuant to Option V, three communities would receive wide area FM allotments, with two communities going to Class C1 allotments. This arrangement contrasts with Option I of the NPRM, which provides only two communities with a wide area allotment, and with NPRM Options II and III, in which only one community receives an upgrade. (Option V differs from Options II and III of the NPRM, in that it proposes allotment of Channel 285A to Ponca City rather than Nowata, and allotment of Channel 286C3 to Nowata.)

10. Furthermore, the allotment scheme proposed in Option V would reduce the overall number of "grandfathered" Class A stations. Currently both KIXR(FM) and KYFM(FM) operate as "grandfathered" Class A stations. After the changes proposed in Option IV, only KIXR(FM) would remain as a "grandfathered" Class A station. Thus, the adoption of Option V would serve the public interest by providing three communities (Okmulgee, Nowata and Bartlesville) with wide area FM service and by eliminating a "grandfathered" Class A allotment. KYFM understands and accepts its obligation to reimburse KIXR(FM), Ponca City, for its

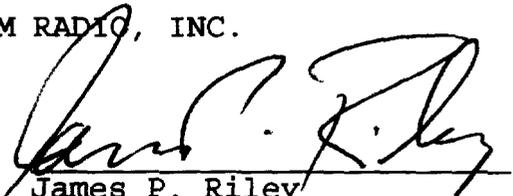
reasonable expenses associated with its change of channel pursuant to Option V.

11. Thus, the public interest would be better served by the adoption of either Option IV or Option V than it would by adoption of Options I, II or III. In both cases, three communities would receive improved FM service, and at least one "grandfathered" Class A allotment would be eliminated. Both of these changes would result in overall improvements to the FM Table of Allotments.

WHEREFORE, the premises considered, KYFM respectfully requests that either Option IV or Option V, as outlined above, be adopted and that its license be modified to specify operation on either Channel 286C3 or Channel 261C1.

Respectfully submitted,

KYFM RADIO, INC.

By: 

James P. Riley
Anne Goodwin Crump

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street
Eleventh Floor
Rosslyn, Virginia
(703) 812-0400

November 7, 1994

KYFM Radio, Inc.
Radio Station KYFM(FM)
1200 SE Frank Phillips Blvd.
Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
Comments and Counterproposal
MM DOCKET 94-100

November 1994

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F. W. Hannel, PE
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STATE OF ILLINOIS)
) SS:
COUNTY OF PEORIA)

F. W. Hannel, after being duly sworn upon oath,
deposes and states:

He is a registered Professional Engineer, by
examination, in the State of Illinois;

He is a graduate Electrical Engineer, holding Bachelor
of Science and Master of Science degrees, both in Electrical
Engineering;

His qualifications are a matter of public record and
have been accepted in prior filings and appearances requiring
scrutiny of his professional qualifications;

The attached Engineering Report was prepared by him
personally or under his supervision and direction and;

The facts stated herein are true, correct, and
complete to the best of his knowledge and belief.

F. W. Hannel

November 3, 1994

F. W. Hannel, P.E.

F. W. Hannel, PE
911 Edward Street
Henry, Illinois 61537
(309) 364-3903
Fax (309) 364-3775

KYFM Radio, Inc.
Radio Station KYFM(FM)
1200 SE Frank Phillips Blvd.
Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
Comments and Counterproposal
MM DOCKET 94-100

November 1994

ENGINEERING STATEMENT

This firm has been retained by KYFM Radio, Inc., ("KYFM"), licensee of Radio Station KYFM(FM), Bartlesville, Oklahoma, to prepare this Engineering Statement in support of its Comments And Counterproposal in the above captioned proceeding. The Commission, in MM Docket 94-100, proposed a number of alternate proposals seeking reallocation of FM channels at Okmulgee, Nowata, and Pawhuska, Oklahoma. None of these proposals involved an upgrade for Radio Station KYFM(FM), Bartlesville, Oklahoma, and KYFM, by this filing, is proposing a realignment which will provide the Community of Bartlesville, Oklahoma, an upgraded channel.

Specifically, KYFM is seeking the assignment of FM Channel 286C3 to the community of Bartlesville, Oklahoma, and the amendment of its operating authority to specify operation on FM Channel 286C3. This request is in conflict with Option 1 as outlined in MM Docket 94-100, and the requested reallocation will provide numerous public service benefits in addition to those proposed by the Commission. The proposed allocation of FM Channel 286C3 to Bartlesville, Oklahoma, and the deletion of the previously assigned FM Channel 261A from that community would eliminate the existing short spacing between KYFM(FM) and Radio Station KIXR(FM), Ponca City, Oklahoma. These short spacings would be eliminated under this proposal. Additionally, the community of Bartlesville, Oklahoma, would receive its first wide coverage area assignment to replace the presently assigned short spaced Class A

assignment at Bartlesville, Oklahoma. The changes suggested in this proposal are superior to the realignment suggested in the Commission's Notice of Proposed Rulemaking.

The community of Bartlesville, Oklahoma, has a population of 34,256 persons, and is located in Washington County, which has a population of 48,066 persons. The proposed assignment of FM Channel 286C3 would provide the community with its first wide coverage area FM allotment, for it is now served only by KYFM(FM), a short-spaced Class A facility, limited to an operating power of 3 kw due to a short spacing with Radio Station KIXR(FM), Ponca City, Oklahoma. The requested changes would provide Bartlesville, Oklahoma with a fully spaced Class C3 allotment, and simultaneously would eliminate the existing short spacing between Bartlesville and Ponca City, thereby allowing the Ponca City facility to operate with a power of 6 kw, an improvement in coverage area for the Ponca City station.

The requested assignment of FM Channel 286C3 at Bartlesville, Oklahoma, can be made at reference coordinates N36-45-12, W95-50-59, in full compliance with the Commission's Rules. The reference site is 7.1 miles northeast of community of Bartlesville, (US Atlas coordinates N36-44-42, W95-58-36), and a transmitter operating at this site provides the entire community with the required city grade, (70 dbu), coverage. Attached as Exhibit E-1 is a channel study conducted from the reference site which clearly demonstrates that the requested assignment fully complies with the Commission's minimum mileage separation requirements. Attached as Exhibit E-2 is a channel study which demonstrates that, with the relocation of the facilities of KYFM(FM), Radio Station KIXR(FM), Ponca City, Oklahoma, can operate as a fully spaced Class A facility at its present transmitter site. Exhibit E-3 is a channel study conducted on FM Channel 261A from the present transmitter site of Radio Station KRIG(FM), which demonstrates that the assignment of Channel 261A satisfies all of the

Commission's mileage separation requirements, and that KRIG(FM) can operate as a fully spaced class A facility from its present transmitter site on FM Channel 261A.

In view of the foregoing, it is respectfully requested that the Commission amend the FM Table of Allotments as follows:

City	Present	Proposed
Bartlesville, OK	261A-	286C3
Ponca City, OK	257A-, 261A-, 265A-	257A, 261A+, 265A-
Okmulgee, OK ¹	231C2	231C1
Nowata, OK	232A+, 268A+	261A+, 268A+
Pawhuska, OK	285A-	280A+

ALTERNATE COUNTERPROPOSAL

In addition to the counterproposal outlined above, KYFM has identified another channel reallocation option that would provide substantial public interest benefits and have minimal impact on the any of the proposals already outlined in the Commission's Notice of Proposed Rulemaking. Namely, KYFM seeks the assignment of FM Channel 261C1 to the community of Bartlesville, Oklahoma. The assignment of FM Channel

¹ Channel Substitutions at Okmulgee and Pawhuska, Oklahoma, were proposed under the various options outlined in the Commission's Notice of Proposed Rulemaking, and are included in this table for reference only. The substance of this counterproposal is to propose substitution of FM Channel 261A at Nowata and to assign FM Channel 286C3 to Bartlesville, Oklahoma. KYFM is not opposed to any other channel substitutions consistent with its request to have the substitutions at Nowata and Bartlesville, Oklahoma, as is outlined above.

261C1 to Bartlesville, Oklahoma, would only require that FM Channel 261A , presently occupied by Radio Station KIXR(FM), Ponca City, Oklahoma, be changed to the alternate equivalent FM Channel 285A. The channel change at Ponca City would replace the presently assigned channel with an equivalent channel, and would not inhibit that licensee from continuing to serve the community of Ponca City with facilities equivalent to those that now are assigned. The channel change at Ponca City would, however, allow the assignment of a wide coverage allotment to Bartlesville, Oklahoma. Insofar as the community of Bartlesville is only served by one FM facility, the assignment of FM Channel 261C1 to the community would result in substantial public interest benefits in excess of the benefits contained in any of the three options outlined by the Commission in its Notice of Proposed Rulemaking.

As more fully demonstrated in Exhibit E-4, the assignment of FM Channel 261C1 can be made at reference coordinates N36-56-50, W96-06-15. This sample site is 15.6 miles northwest of the community of Bartlesville, Oklahoma, (US Atlas coordinates N36-44-42, W95-58-36), and a transmitter operating from this sample site fully complies with both the Commission's city grade illumination and minimum mileage separation requirements. Exhibit E-5 is a channel study conducted for Radio Station KIXR(FM), Ponca City, Oklahoma, at its present transmitter site, which demonstrates that the assignment of FM Channel 285A as a replacement for FM Channel 261A provides that community with facilities that are equivalent to those that exist on FM Channel 261A. Exhibit E-6 is a Channel Study for FM Channel 284C1 at Alva, Oklahoma, which demonstrates that the minor change in allotment coordinates at that community can be made in full compliance with the Commissions requirements.

Under this proposal no community is deprived of an aural service, nor does any community receive an allotment that is inferior to its present allotment, while the community of Bartlesville, Oklahoma, receives a wide coverage area facility to improve the service capability of its only FM allotment.

In view of the foregoing, it is respectfully requested that the Commission amend the FM Table of Allotments as follows:

City	Present	Proposed
Bartlesville, OK	261A-	261C1
Ponca City, OK	257A-, 261A-, 265A-	257A, 265A-, 285A-
Okmulgee, OK ²	231C2	231C1
Nowata, OK	232A+, 268A+	268A+, 286C3
Pawhuska, OK	285A-	280A+

The above proposal provides substantial public interest benefits. The community of Bartlesville, Oklahoma, receives its first wide coverage area facility; the community of Nowata, Oklahoma, receives a wide coverage area facility; the community of Okmulgee, Oklahoma, receives a wide coverage area facility; and finally, the community of Pawhuska, Oklahoma, retains an assignment. No community is deprived of an aural service and the conflicts in this proceeding are all but eliminated.

² Channel Substitutions at Okmulgee and Pawhuska, Oklahoma, were proposed under the various options outlined in the Commission's Notice of Proposed Rulemaking, and are included in this table for reference only. The substance of this counterproposal is to propose substitution of FM Channel 261C1 at Bartlesville, Oklahoma, and the substitution of FM Channel 285A at Ponca City, Oklahoma. KYFM is not opposed to any other channel substitutions consistent with its request to have the substitutions at Ponca City and Bartlesville, Oklahoma, as is outlined above.

In view of the foregoing, KYFM requests Commission consideration of the two proposals as outlined above. Both offer substantial public service benefits, and the resulting realignment of allotments under both proposals results in an orderly and fair distribution of the various available channels for the respective communities.

KYFM Radio, Inc.
 Radio Station KYFM(FM)
 1200 SE Frank Phillips Blvd.
 Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
 Comments and Counterproposal
 MM DOCKET 94-100

November 1994

FM Channel Study
 Channel 286C3
 Bartlesville, Oklahoma
 N36-45-12 W95-50-59

Exhibit E-1

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Nowata	OK	232	A	U	20.6	12.0	109.5°	8.6
KRIG	Nowata	OK	232	A	D	8.6	12.0	97.7°	-3.4 SHORT! ¹
KRIG	Nowata	OK	232	A	L	8.6	12.0	97.7°	-3.4 SHORT! ¹
ALC	Pryor	OK	283	C1	U	83.3	76.0	168.0°	7.3
KMYZFM	Pryor	OK	283	C1	L	83.3	76.0	168.0°	7.3
ALC	Bristow	OK	285	A	U	120.5	89.0	207.1°	31.5
ALC	Pawhuska	OK	285	A	V	47.7	89.0	267.3°	-41.3 SHORT! ²
ALC	Pawhuska	OK	285	A	D	47.7	89.0	267.3°	-41.3 SHORT! ²
KREK	Bristow	OK	285	A	L	120.5	89.0	207.1°	31.5
KRIG	Nowata	OK	285	A	A	8.6	89.0	97.7°	-80.4 SHORT! ³
ALC	Willard	MO	286	C2	U	214.6	177.0	72.8°	37.6
KOSP	Willard	MO	286	C2	C	210.8	177.0	82.0°	33.8
ALC	Perry	OK	286	A	U	142.0	142.0	247.5°	0.0
KASRFM	Perry	OK	286	A	L	147.5	142.0	247.2°	5.5
KRIG	Nowata	OK	286	C3	A	8.7	153.0	77.5°	-144.3 SHORT! ³
ALC	Columbus	KS	287	C3	U	112.3	99.0	60.8°	13.3
ALC	Haysville	KS	287	C	U	186.1	176.0	307.7°	10.1
KOCD	Columbus	KS	287	C	L	112.3	99.0	60.8°	13.3
KXLK	Haysville	KS	287	C	L	186.1	176.0	307.7°	10.1
ALC	Bixby	OK	287	C3	U	99.2	99.0	175.7°	0.2
KBXT	Bixby	OK	287	C3	C	99.2	99.0	175.7°	0.2

All distances in Kilometers

1. To FM Channel 261A+.
2. To FM Channel 280A+, or deletion.
3. To FM Channel 261A+.

KYFM Radio, Inc.
 Radio Station KYFM(FM)
 1200 SE Frank Phillips Blvd.
 Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
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FM Channel Study
 Channel 261A+
 Ponca City, Oklahoma
 N36-47-19 W97-02-53

Exhibit E-2

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Alva	OK	259	C1	U	110.5	75.0	258.8°	35.5
KXLS	Alva	OK	259	C1	L	110.5	75.0	258.8°	35.5
ALC	Woodward	OK	261	C1	U	222.0	200.0	257.2°	22.0
ALC	Ponca City	OK	261	A	U	0.0	115.0	0.0°-115.0	SHORT!
ALC	Bartlesville	OK	261	A	U	106.7	115.0	93.2°	-8.3 SHORT! ¹
KIXR	Ponca City	OK	261	A	L	0.0	115.0	0.0°-115.0	SHORT!
KWFX	Woodward	OK	261	C1	C	217.0	200.0	257.9°	17.0
KYFM	Bartlesville	OK	261	A	L	106.7	115.0	93.2°	-8.3 SHORT! ¹
ALC	Kingman	KS	262	C2	U	135.6	106.0	311.9°	29.6
KTCM	Kingman	KS	262	C2	L	127.4	106.0	308.3°	21.4

All Distances in Kilometers

1. To FM Channel 286C3.

KYFM Radio, Inc.
 Radio Station KYFM(FM)
 1200 SE Frank Phillips Blvd.
 Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
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FM Channel Study
 Channel 261A
 Nowata, Oklahoma
 N36-44-35 W95-45-17

Exhibit E-3

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Henryetta	OK	258	C1	U	106.2	75.0	198.2°	31.2
KCKI	Henryetta	OK	258	C1	L	106.2	75.0	198.2°	31.2
ALC	Ponca City	OK	261	A	U	115.6	115.0	272.5°	0.6
ALC	Bartlesville	OK	261	A	U	9.0	115.0	263.9°-106.0	SHORT! ¹
KIXR	Ponca City	OK	261	A	L	115.6	115.0	272.5°	0.6
KYFM	Bartlesville	OK	261	A	L	9.0	115.0	263.9°-106.0	SHORT! ¹
ALC	Southwest City	MO	262	A	U	105.4	72.0	104.0°	33.4
KMMQ	Southwest City	MO	262	A	L	105.7	72.0	104.3°	33.7
KHJM	Taft	OK	262	A	L	110.5	72.0	166.3°	38.5
KHJM	Taft	OK	262	A	C	104.7	72.0	170.9°	32.7
ALC	Claremore	OK	264	A	U	47.2	31.0	151.2°	16.2
KTFR	Claremore	OK	264	A	C	48.0	31.0	151.5°	17.0
KTFR	Claremore	OK	264	A	A	40.1	31.0	161.0°	9.1

All Distances in Kilometers

1. To FM Channel 286C3.

KYFM Radio, Inc.
 Radio Station KYFM(FM)
 1200 SE Frank Phillips Blvd.
 Bartlesville, Oklahoma 74005

ENGINEERING STATEMENT
 Comments and Counterproposal
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FM Channel Study
 Channel 261C1
 Bartlesville, Oklahoma
 N36-56-50 W96-06-15

Exhibit E-4

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Lamar	MO	260	A	U	172.0	133.0	72.0°	39.0
KHST	Lamar	MO	260	A	L	171.3	133.0	72.0°	38.3
ALC	Cassville	MO	261	A	U	208.2	200.0	100.1°	8.2
KRLK	Cassville	MO	261	A	L	208.2	200.0	99.8°	8.2
ALC	Byng	OK	261	C3	U	237.2	211.0	193.7°	26.2
ALC	Ponca City	OK	261	A	U	86.0	200.0	258.2°-114.0	SHORT! ¹
ALC	Bartlesville	OK	261	A	U	32.4	200.0	136.7°-167.6	SHORT!
KIXR	Ponca City	OK	261	A	L	86.0	200.0	258.2°-114.0	SHORT! ¹
KYFM	Bartlesville	OK	261	A	L	32.4	200.0	136.7°-167.6	SHORT!
ALC	Topeka	KS	262	C	U	223.4	209.0	4.3°	14.4
KDVV	Topeka	KS	262	C	L	223.4	209.0	4.3°	14.4
KTCM	Kingman	KS	262	C2	L	193.6	158.0	288.5°	35.6
ALC	Southwest City	MO	262	A	U	141.7	133.0	109.9°	8.7
KMMQ	Southwest City	MO	262	A	L	142.1	133.0	110.1°	9.1
ALC	Taft	OK	262	A	U	141.6	133.0	160.8°	8.6
KHJM	Taft	OK	262	A	L	142.2	133.0	156.1°	9.2
KHJM	Taft	OK	262	A	C	134.8	133.0	159.2°	1.8
ALC	Claremore	OK	264	A	U	83.7	75.0	139.9°	8.7
KTFR	Claremore	OK	264	A	C	84.5	75.0	140.1°	9.5
KTFR	Claremore	OK	264	A	A	75.0	75.0	143.9°	0.0
ALC	Commerce	OK	259	A	D	109.5	75.0	90.6°	34.5

All Distances in Kilometers

1. To FM Channel 285A.

KYFM Radio, Inc.
 Radio Station KYFM(FM)
 1200 SE Frank Phillips Blvd.
 Bartlesville, Oklahoma 74005

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FM Channel Study
 Channel 285A-
 Ponca City, Oklahoma
 N36-47-19 W97-02-53

Exhibit E-5

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Alva	OK	284	C1	U	118.8	129.0	256.8°	-10.2 SHORT! ¹
ALC	Bristow	OK	285	A	U	123.1	105.0	154.6°	18.1
ALC	Pawhuska	OK	285	A	V	59.7	105.0	95.9°	-45.3 SHORT! ²
ALC	Pawhuska	OK	285	A	D	59.7	105.0	95.9°	-45.3 SHORT! ²
KREK	Bristow	OK	285	A	L	123.1	105.0	154.6°	18.1
KRIG	Nowata	OK	285	A	A	115.6	105.0	92.5°	10.6
ALC	Perry	OK	286	A	U	67.5	64.0	205.0°	3.5
KASRFM	Perry	OK	286	A	L	67.5	64.0	205.0°	3.5
KRIG	Nowata	OK	286	C3	A	115.5	84.0	91.0°	31.5
ALC	Haysville	KS	287	C	U	117.2	94.0	339.5°	23.2
KXLK	Haysville	KS	287	C	L	117.2	94.0	339.5°	23.2

All Distances in Kilometers

1. Reference site amended to N36-31-02, W98-29-51.
2. To FM Channel 280A or deleted.

KYFM Radio, Inc.
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FM Channel Study
 Channel 284C1
 Alva, Oklahoma
 N36-31-02, W98-29-51

Exhibit E-6

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Oklahoma City	OK	281	C	U	140.7	105.0	139.7°	35.7
KMGL	Oklahoma City	OK	281	C	L	140.7	105.0	139.7°	35.7
ALC	Augusta	KS	283	C2	U	197.7	158.0	43.8°	39.7
KLLS	Augusta	KS	283	C2	C	179.9	158.0	37.5°	21.9
ALC	Alva	OK	284	C1	U	14.3	245.0	77.5°	230.7 SHORT!
ALC	Burkburnett	TX	284	C	U	271.2	270.0	187.3°	1.2
KYYI	Burkburnett	TX	284	C	L	271.2	270.0	187.3°	1.2
ALC	Bethany	OK	285	A	U	137.9	133.0	145.0°	4.9
KNTL	Bethany	OK	285	A	L	137.9	133.0	145.0°	4.9
ALC	Perry	OK	286	A	U	109.9	75.0	104.9°	34.9
KASRFM	Perry	OK	286	A	L	106.1	75.0	107.0°	31.1

All Distances in Kilometers

Distance from Proposed FM Channel 285A at Ponca City, Oklahoma, (N36-47-19, W97-02-53), to amended reference site at Alva, Oklahoma, (N36-31-02, W98-29-51), is 133 kilometers, as required under the Commission's Mileage Separation Requirements. The amended reference site for FM Channel 284C1 is 21 miles from the city of Alva, Oklahoma, (US Atlas coordinated N36-48-06, W98-40-00).

CERTIFICATE OF SERVICE

I, Roberta Wadsworth, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C. do hereby certify that true copies of the foregoing "Comments and Counterproposal" were sent this 7th day of November, 1994, by first class United States mail, postage prepaid, to the following:

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