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PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION

By Royal Communications
1018 S.W. Bade Ave.
College Place, WA 99324

May 21, 1998

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FEDERAL COMMUNICATIONS COMMISSION

May 20, 1998

Federal Communications Commission
Attn: Mme. Magalie Roman Salas, Secretary
Washington, D. C. 20554

Dear Mme. Magalie Roman Salas:

I respectfully request the following amendment of section 73.202 of the rules and regulations of the Federal Communications Commission: the addition of channel 228A at Royal City, WA to the table of allotments, as Royal City's second local aural transmission service.

Current Table of allotments for Washington
Royal City..... 242C3

Proposed Table of allotments for Washington
Royal City..... 242C3, 228A

Royal City has already met the commission's specifications for being a suitable city of license, since there is already one FM allocation and station. Royal City has a population of 1,283 persons and is located in Grant County, Washington (population 69,719 according to the US Census Bureau's 1997 estimate). It has a post office and its own zip code. Petitioner further states that Royal City, has a bank, a school district, churches, and an identifiable business center. Royal City's economy is based on agriculture.

The applicant notes that at last check, the existing Royal City allotment was being used for a non-commercial station, though it is not reserved for non-commercial use. Thus, if this allocation were granted and the applicant were to receive a construction permit, this would appear to be the town's first commercially operated radio station.

The coordinates of Royal City , 46-54-04 119-37-46, will not fully satisfy all of the commission's regulations regarding the separation of FM allotments for 228A. However, the applicant has found a suitable, developed communications site which would, with one possible exception, fully meet all of the Commission's separation rules and would serve the city of license with a 70 db signal. The coordinates of this site are 46-48-25 119 33 12, which is also that of KRCW Royal City, WA. Please see the attached separation study.

Of concern are two of the listings for KOZI-FM Chelan, Washington's one-step application BPH-970703IC to move from 228A to 228C3. The commission appears to have dismissed this application on March 17, 1998 as noted in the FCC's daily digest of March 20, 1998 and as noted in the comments attached to this application in the commission's on-line database, yet it and the allocation that was proposed in it remain in

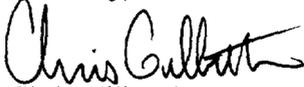
the database. Thus if KOZI's application has truly been dismissed, then the this applicant's proposed site will meet all spacing requirements. If it has not, it appears that there is no suitable site for a second allocation to Royal City on this channel.

It was further determined that the distance from the proposed allocation site to Royal City is 11.96 kilometers, while a class A station at the proposed site would deliver a 70 db signal for 14 kilometers. This appears to fulfill the Commission's code on this matter.

The applicant hereby expresses interest in applying for a construction permit on the channel, should it be allotted, and once the current freeze has been lifted, allowing for a filing window.

Please address any correspondence on this matter to my address below.

Sincerely,



Chris Gilbreth

Royal Communications
1018 S.W. Bade Ave.
College Place, WA 99324

05-21-1998

CH# 228A - 93.5 MHz

INTERFERENCE CHECKS WITH PROPOS, Royal City, WA at N. LAT. 46 48 25 W. LNG. 119 33 12

PWR = .13 kW H.A.A.T. = 505 M C.O.R. = 822 M AMSL

Protected F(50-50) 60 dBu = 25.17 km

F(50-10)	40 dBu = 77.52	54 dBu = 38	80 dBu = 6.36	100 dBu = .8
F(50-10)	37 dBu = 86.63	51 dBu = 45.87	77 dBu = 8.22	97 dBu = 1.14
F(50-10)	34 dBu = 96.48	48 dBu = 54.2	74 dBu = 10.46	94 dBu = 1.61

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR (kW)	INT (km)	PRO (km)
CITY	STATE	LICENSEE			<---		LNG.	HAAT (M)	COR (M)	FILE #
225C2	KQSN	LI CN	55.0 R	17.5 M	242.6	72.52 km	46 30 15	17.00	5.58	51.92
Toppenish	WA	T&J Broadcasting, Inc.			62.6	45.06 Mi	120 23 33	257.0	629	BLH900706KF
225C	KZZUFM	LI CY	95.0 R	97.0 M	62.0	192.04 km	47 35 42	85.00	13.41	91.65
Spokane	WA	QueenB			242.0	119.33 Mi	117 17 53	634.0	1335	BLH781017AE
227C1	KTWY	LI CN	133.0 R	6.7 M	130.2	139.72 km	45 59 19	42.00	106.09	71.94
Walla Walla	WA	Comcast Media Services, In			310.2	86.82 Mi	118 10 28	420.0	1163	BLH911202KA
227C	KUBE	LI CY	165.0 R	45.3 M	293.9	210.30 km	47 32 39	100.00	117.50	79.23
Seattle	WA	New Century Seattle Licens			113.9	130.67 Mi	122 06 29	393.0	518	BLH831004AF
228C3	ALOPEN	AL N	142.0 R	-26.2 M	350.9	115.80 km	47 50 06	25.00	113.52	38.53
Chelan	WA				170.9	71.95 Mi	119 47 59	100.0	0	
FCC Comment > **To channel 228C3 per one-step application BPH-970703IC										
228C3	KOZIFM	AP ZCN	142.0 R	-23.3 M	348.5	118.65 km	47 51 07	2.00	96.79	37.01
Chelan	WA	Northcentral Broadcasting			168.5	73.73 Mi	119 52 18	313.0	986	BPH970703IC
FCC Comment > **From channel 282A per one-step application-Amended 980128										
Dismissed 980317										
Class B1 with respect to Canada										
228A	KOZIFM	LI CN	115.0 R	3.7 M	348.5	118.65 km	47 51 07	0.59	80.53	28.53
Chelan	WA	Northcentral Broadcasting			168.5	73.73 Mi	119 52 18	317.0	986	BMLH910204KE
FCC Comment > **to channel 228C3 per one-step application BPH-970703IC										
Class B1 with respect to Canada										
229C	KDRKFM	LI CN	165.0 R	40.5 M	64.6	205.54 km	47 34 13	56.00	133.40	90.67
Spokane	WA	Price Broadcasting Company			244.6	127.72 Mi	117 05 00	725.0	1573	BLH7372
229A	AP229	AP ZCN	72.0 R	33.7 M	290.5	105.71 km	47 07 52	1.40	40.17	27.00
Cle Elum	WA	Brian J. Lord			110.5	65.69 Mi	120 51 33	186.0	1117	BPH970711ME
229A	KGSG	LI CN	72.0 R	13.9 M	159.4	85.94 km	46 04 59	0.60	40.91	27.49
Pasco	WA	Gospel Music Broadcasting			339.4	53.40 Mi	119 09 38	292.0	636	BLH970409KA
229A	ALOPEN	AL N	72.0 R	32.5 M	290.4	104.51 km	47 07 36	6.00	43.29	28.29
Cle Elum	WA	96-233			WO= 970	110.4	64.94 Mi	120 50 41	100.0	0
FCC Comment > Proposed as Class B1 to Canada 961115-Limited to 6kw ERP and 100m HAAT or the equivalent-Accepted by Canada 970425										
Site Restriction 10.4km Southeast-Effective 6-16-97 per D96-233										

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR (kW)	INT (km)	PRO (km)
CITY	STATE	LICENSEE			<---		LNG.	HAAT (M)	COR (M)	FILE #
229A	AP229	AP ZCN	72.0 R	29.6 M	292.7	101.58 km	47 09 06	6.00	24.43	15.92
Cle Elum	WA	Michael F. & Bridget T. An			112.7	63.12 Mi	120 47 23	29.0	866	BPH970716MC
229A	AP229	AP ZCN	72.0 R	29.6 M	292.7	101.59 km	47 09 07	6.00	31.62	20.86
Cle Elum	WA	Morris Piha, Inc.			112.7	63.13 Mi	120 47 23	53.0	894	BPH970716MG
230C3	KTAC.C	CPM CN	42.0 R	15.1 M	358.5	57.09 km	47 19 13	18.00	13.29	38.96
Ephrata	WA	TRMR, Inc.			178.5	35.47 Mi	119 34 22	120.0	630	BMPH951120IQ
FCC Comment > Proposed as Class B1 to Canada 970623-Accepted by Canada 971120										
230A	KTAC.A	AP CN	31.0 R	26.1 M	358.5	57.09 km	47 19 13	0.68	5.34	16.79
Ephrata	WA	TRMR, Inc.			178.5	35.47 Mi	119 34 22	103.0	614	BMPH980323IC
FCC Comment > Changed Channel from 230C3.										
231C	KMPSPM	LI CN	95.0 R	48.4 M	305.4	143.42 km	47 32 35	81.00	10.51	74.27
Seattle	WA	Professional Broadcasting,			125.4	89.12 Mi	121 06 25	356.0	480	BMLH910701KE
231C	KCLKFM	LI CN	95.0 R	96.8 M	100.8	191.78 km	46 27 27	100.00	11.43	77.91
Clarkston	WA	Clarkston Broadcasters, In			280.8	119.17 Mi	117 06 03	376.0	969	BLH831227AC
I.F. RELATIONSHIPS:										
281C1	KXDD	LI CN	22.0 R	50.7 M	243.5	72.65 km	46 30 48	61.00	7.87	62.43
Yakima	WA	Butterfield Broadcasting C			63.5	45.14 Mi	120 24 05	238.0	629	BLH1929