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JOHN M. PELKEY
ADMITTED IN VA. AND D.C.

OUR FILE NO.
1673-101-63

July 22, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Amendment of Section 73.202(b)
Ironton and Salem, Missouri

Dear Ms. Salas:

Transmitted herewith on behalf of Dockins Communications, Inc., and Ultra-Sonic Broadcast Stations, Inc., are an original and four copies of a Petition For Rulemaking.

No filing fee need accompany this Petition.

If there are any questions in regard to this matter, please contact this office directly.

Sincerely yours,



John M. Pelkey

JMP:dh
Enclosure

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Before The
Federal Communications Commission
Washington, D.C. 20554

RECEIVED
JUL 22 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
) MM Docket No. _____
Amendment of Section 73.202(d)) RM _____
Table of Allotments)
FM Broadcast Stations)
Ironton, Missouri and)
Salem, Missouri)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Petition for Rulemaking

Dockins Communications, Inc. ("Dockins"), licensee of Station KYLS-FM, Ironton, Missouri, and Ultra-Sonic Broadcast Stations, Inc. ("Ultra-Sonic"), licensee of Station KMMC(FM), Salem, Missouri, (jointly referred to as "Petitioners") hereby request that the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's rules to substitute Channel 240C3 for Channel 224A at Ironton, Missouri; to substitute Channel 225C3 for Channel 240A at Salem, Missouri, and to modify the licenses of KYLS-FM and KKID(FM) accordingly. In support of this request, the Petitioners state as follows:

I. The Proposal

KYLS-FM currently operates as a Class A facility on Channel 225. The Commission recently ordered KYLS-FM to move to Channel 224 as part of a rulemaking permitting the improvement of the facilities of KMAL(FM), Malden, Missouri.¹ Dockins attempted, through the submission of a counterproposal in that rulemaking, to upgrade KYLS-FM to Class C3 status. The Commission, finding that the counterproposal was not a true counterproposal, rejected the attempted KYLS-FM upgrade and suggested that Dockins initiate a stand-alone rulemaking to upgrade KYLS-FM.² The present petition seeks to initiate such a rulemaking.

As is demonstrated in Exhibit 8 of the attached Engineering Statement of Wheeler Broadcast Consulting (the "Engineering Statement"), KYLS-FM is precluded from upgrading to Class C3 status on Channel 224 because of significant short-spacing to WVZA(FM) in Herrin, Illinois; KMAL(FM) in Malden, Missouri; and an application for a new FM station at Poplar Bluff, Missouri. In fact, as is also demonstrated in Exhibit 8 of the Engineering Statement, the only channel on which KYLS-FM can be upgraded to Class C3 status is Channel 240, and even

¹ *Ironton, Malden and Salem, Missouri*, 13 FCC Rcd. 6584 (1998)

² *Id.* at 6584 n.2.

that channel can be used only if KKID(FM) in Salem, Missouri, also changes channel.

Co-petitioner Ultra-Sonic is the licensee of KKID(FM).³ KKID(FM) currently operates on Channel 240 as a Class A facility. Like Dockins, Ultra-Sonic wishes to upgrade KKID(FM) to Class C3 status. The substitution of Channel 240C3 for Channel 224A at Ironton would permit KKID(FM) to move to Channel 225 as a Class C3 facility. In fact, with the substitution of Channel 240C3 for Channel 224A at Ironton, the only channel on which KKID(FM) can be upgraded to Class C3 status is Channel 225.

The Petitioners are thus proposing that, with respect to KYLS-FM, Channel 240C3 be substituted for Channel 224A at Ironton, Missouri, and the license for KYLS-FM modified accordingly. The Petitioners are further proposing that, with respect to KKID(FM), Channel 225C3 be substituted for Channel 240A at Salem, Missouri, and the KKID(FM) license modified accordingly. Reduced to its essentials, the proposal is that KYLS-FM and KKID(FM) swap channels and that each allocation be upgraded to C3 status.

³ The rejected counterproposal in *Ironton, Malden and Salem, Missouri* proposed that KKID(FM)'s channel be changed. As a result, the Commission issued an Order to Show Cause to Ultra-Sonic. *Ironton, Malden and Salem, Missouri, Order to Show Cause*, 12 FCC Rcd 15323 (1997). Because Ultra-Sonic is one of the Petitioners petitioning the Commission for a channel change in the present rulemaking, there is no need for the Commission to issue a new Order to Show Cause.

II. Incompatible Channel Swap

Because Channel 240C3 cannot be used at Ironton while Channel 240A is operating in Salem and because Channel 225C3 cannot be used in Salem while Channel 224A is operating in Ironton, and because there are no other alternate channels available for the upgrades either at Ironton or Salem, the proposal creates a mutually-exclusive relationship as contemplated by Section 1.420(g)(3) of the Commission's rules and therefore is exempt from the consideration of competing proposals. *See Modification of FM Broadcast Licenses to Higher Class Co-Channels or Adjacent Channels*, 60 RR 2d 114, 120 (1986). *See also Ashdown and DeQueen Arkansas, Notice of Proposed Rule Making*, 12 FCC Rcd. 17388 (1997), *Report and Order*, 13 FCC Rcd. 8544 (1998).

III. Public Interest Benefits

The proposal would result in significant public interest benefits. Specifically, the area encompassed within KYLS-FM's 60 dBu contour would increase from 1,846.7 square km to 4,681.8 square km. That constitutes an increase of 153 percent. Similarly, the population within the KYLS-FM 60 dBu contour would increase from 15,802 persons to 38,933, an increase of 146 percent. In a like vein, the area within the 60 dBu contour of KKID(FM) would increase from 974.8 square km to 4,755.4 square km, an increase of 388 percent, and the population

within the KKID(FM) 60 dBu contour would increase from 11,410 persons to 49,796 persons, an increase of 336 percent.

By contrast, grant of the proposal would not result in any adverse effect on the public. Because the 60 dBu contour that would be achieved by KYLS-FM operating with Class C3 facilities would totally encompass the area within KYLS-FM's current 60 dBu contour, there would be absolutely no loss of service as a result of the grant of the proposal. This would also be true in the case of KKID(FM) inasmuch as the 60 dBu contour of the proposed KKID facilities would totally encompass the area within the 60 dBu contour of KKID(FM)'s present facilities.

Moreover, the proposal could be granted in complete conformity with the Commission's allocations requirements. The allocation of Channel 240C3 to Ironton requires the specification of only a 10.06 km SW site restriction. The reference site for the proposed Channel 225C3 allocation at Salem is the same as the present licensed site for KKID(FM).⁴ From those reference sites, the proposed facilities meet all spacing requirements.

⁴ The proposed reference site for the Channel 240C3 facilities at Ironton, although included within the boundaries of the Mark Twain National Forest, are physically located on private property. Thus the reference site is suitable for allocation purposes.

Neither of the proposed facilities is in the vicinity of any urbanized area. As a result, there is no need to demonstrate that Ironton and Salem are separate and distinct from any neighboring jurisdictions.

IV. Requisite Commitments

Dockins commits that, if the requested rule changes are adopted, it will promptly file the requisite application for the modified facilities for KYLS-FM and will promptly construct such facilities upon grant of the application. Ultra-Sonic commits that, if the requested rule changes are adopted, it will promptly file the requisite application for the modified facilities for KMMC(FM) and will promptly construct such facilities upon grant of the application.

Conclusion

The proposed substitutions of Channel 240C3 for Channel 224A at Ironton and the corresponding substitution of Channel 225C3 for Channel 240A at Salem will result in significant public interest benefits. A total of 61,517 persons would receive additional aural service as a result of the adoption of the proposal and no loss of service would occur. Accordingly, Dockins and Ultrasonic respectfully request that the Commission institute a rulemaking proceeding that would amend the FM Table of Allotments as follows:

Community	Present Allotment	Proposed Allotment
Ironton, MO	224A	240C3
Salem, MO	240A	225C3

Respectfully submitted,

DOCKINS COMMUNICATIONS, INC.

By: 
John M. Pelkey
Its Attorney

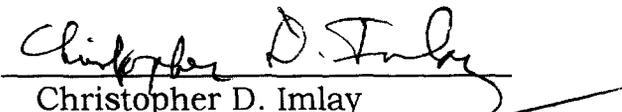
HALEY BADER & POTTS P.L.C.
4350 North Fairfax Drive
Suite 900
Arlington, VA 22203-1633

(703) 841-0606

Date: July 22, 1998

Respectfully submitted,

ULTRA-SONIC BROADCAST STATIONS, INC.

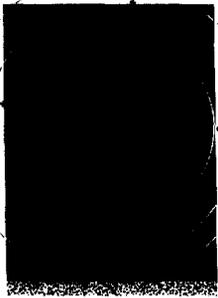
By: 
Christopher D. Imlay
Its Attorney

Booth Freret Imlay & Tepper, PC.
5101 Wisconsin Avenue, NW
Suite 307
Washington, DC 20016-4120

(202) 686-9600

July 22, 1998

ORIGINAL



WHEELER BROADCAST CONSULTING

Engineering Statement

Petition for Rule Making

*Amend 47 CFR 73.202 (b)
Channel 225 C3 - Salem, MO
Channel 240 C3 - Ironton, MO*

This consultant has been retained, jointly, by Dockins Communications, Inc. (Dockins), licensee of KYLS-FM in Ironton, MO and Ultra-Sonic Broadcast Stations, Inc. (Ultra-Sonic), licensee of KKID in Salem, Missouri for the purpose of preparing technical support for a petition for Rule Making seeking Class C-3 upgrades for the respective radio stations. KYLS-FM presently operates on Channel 225 A¹ at Ironton and KKID presently operates on Channel 240 A at Salem.

Both Dockins and Ultra-Sonic are precluded from upgrades on their existing channels. A search of the Commission's July 14, 1998 FM database reveals, however, that Dockins could serve Ironton with a Class C3 facility on Channel 240 if KKID at Salem was reassigned a new frequency. The search further reveals that Ultra-Sonic could serve Salem with a Class C3 facility on Channel 225 if KYLS-FM was reassigned a new frequency. The search further reveals that there are no other Class C-3 frequencies presently available for allocation at either Ironton or at Salem. It is thus proposed that Dockins and Ultra-Sonic swap frequencies so as to accommodate the respective upgrades. Inasmuch as Channel 240 C3 cannot be used at Ironton while Channel 240 A is in use at Salem and inasmuch as Channel 225 C3 cannot be used at Salem while Channel 224 A is in use at Ironton and further, inasmuch as there are no other Class C3 frequencies available for use at Ironton or at Salem this proposal represents an incompatible channel swap and, as such, there is no need to open any additional channels nor to accept competing expressions of interest.

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MISSION, KS 66202
913.362.7282
913.362.7287

¹ KYLS has been ordered to Channel 224A in Docket 97-136, RM-9083.

A full commercial channel Class C3 allocation search for Salem is included with this report as Exhibit 7 and a similar Class C3 allocation search for Ironton is included as Exhibit 8.

Channel 225 C3 - Salem, Missouri

Channel 225 C3 can be allocated to Salem, Missouri, in full compliance with the minimum spacing requirements of 47 CFR 73.207 if KYLS-FM were moved from its licensed frequency (Channel 225 A) and its newly assigned frequency (Channel 224 A). For the purposes of the Channel 225 C3 allocation study the existing KKID, Channel 240 A, transmitter site was used². A copy of a search of the Commission's July 14, 1998 FM database, demonstrating compliance with 47 CFR 73.207 on Channel 225 C3, is included in this report as Exhibit 1. The Channel 225 C3 allocation would further be fully compliant with the provisions of 47 CFR 73.315 as it would illuminate the entire corporate boundaries of Salem, Missouri with a predicted signal well in excess of 70 dBu. Exhibit 3 of this report is a digitally generated map showing the 60 dBu and 70 dBu contours of the Channel 225 C3 reference facilities³ at Salem, as well as the corporate boundaries of Salem, Missouri, demonstrating that the proposed facility would be in compliance with all principal community coverage requirements.

Channel 240 C3 - Ironton, Missouri

Channel 240 C3 can be allocated to Ironton, Missouri, in full compliance with the minimum spacing requirements of 47 CFR 73.207 if KKID were moved from its licensed frequency (Channel 240 A), with the imposition of a 10.06 km S.W. site restriction so as to clear the licensed Class A operation of WDQN-FM in Duquoin, IL. For the purposes of the Channel 240 C3 allocation study the point nearest to Ironton at which the minimum spacing requirements of 47 CFR 73.207 were met was selected. The allocation reference coordinates are:

37° 33' 46" N
90° 44' 29" W

² The coordinates of KKID are 37° 38' 01" N by 91° 32' 05" W.

³ The contours for the Salem reference facility are based on a 25 kW at 100 m HAAT model Class C3 operation.

A copy of a search of the Commission's July 14, 1998 FM database, demonstrating compliance with 47 CFR 73.207 on Channel 240 C3, is included in this report as Exhibit 2. The Channel 240 C3 allocation would further be fully compliant with the provisions of 47 CFR 73.315 as it would illuminate the entire corporate boundaries of Ironton, Missouri with a predicted signal in excess of 70 dBu. Exhibit 4 of this report is a digitally generated map showing the 60 dBu and 70 dBu contours of the Channel 240 C3 reference facilities⁴ at Ironton, as well as the corporate boundaries of Ironton, Missouri, demonstrating that the proposed facility would be in compliance with the principal community coverage requirements of 47 CFR 73.315.

Comparative Service

The upgraded Class C3 facilities at Salem and Ironton would result in a large increase in the area and population served by KYLS-FM and KKID. The area encompassed by the KYLS 60 dBu contour would increase from 1,846.7 km² to 4,681.8 km², an increase of 153% and the population served by that contour would increase from 15,802 persons to 38,933 persons, an increase of 146%. The 60 dBu contour of the Channel 240 C3 reference facility would completely encompass the area within the 60 dBu of the licensed KYLS-FM operation and, as such, there would be no loss in service as a result of the re-allocation. Exhibit 6 of this report is a digitally generated map that shows both the licensed 60 dBu contour served by KYLS-FM and the 60 dBu contour of the Channel 240 C3 reference facility.

KKID would receive an even larger benefit as a result of the re-allocation. The area encompassed by the predicted 60 dBu contour of KKID would increase from its presently licensed 974.8 km² to 4,755.4 km², an increase of 388%. Population served by the Class C3 reference facility would similarly increase from the 11,410 persons presently served to 49,796 persons, an increase of 336%. The 60 dBu contour of the Channel 225 C3 reference facility would also completely encompass the 60 dBu contour of the licensed KKID operation and, as such, no loss in service would result from the re-allocation. Exhibit 5 of this report is a digitally generated map that shows both the licensed 60 dBu contour served by KKID and the 60 dBu contour of the Channel 225 C3 reference facility.

⁴ The contours for the Ironton reference facility are based on a 25 kW at 100 m HAAT model Class C3 operation.

Suitability of Reference Sites

The Channel 225 C3 reference site is the same site as the KKID license. In that the allocation is presently used as an FM transmitter site it is inherently suitable for the purposes of allocation. Ironton, Missouri and its surrounding areas are a part of the Mark Twain National Forest. Although the reference site is included in the National Forest, there are numerous parcels of land that are privately owned, including the reference site itself. Exhibit 9 is a full scale reproduction of the relevant portion of the Ironton, MO USGS 7½' topographic quadrangle that identifies the reference site. Exhibit 10 is a copy of the Iron County Plat Book that identifies the parcel of privately owned land on which the reference site lies.

Conclusion

The proposed substitutions of Channel 240 C3 for Channel 224 A at Ironton and the tandem substitution of Channel 225 C3 for Channel 240 A at Salem will result in large increases in service area for both Dockins and Ultra-Sonic. A total of 61,517 persons would receive an additional aural service as a result of the re-allocation of KYLS-FM and KKID. No loss in service will occur for either station and hence no person that presently receives service from KYLS-FM or KKID would be denied such service. Neither Ironton nor Salem are located in or around any designated urbanized areas. Accordingly, Dockins and Ultra-Sonic respectfully request that the Commission amend 47 CFR 73.202 (b) to read as follows:

Community	Present Allocation	Proposed Allocation
Ironton, MO	224 A	240 C3
Salem, MO	240 A	225 C3

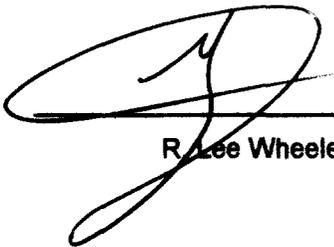
Methodology

All contour predictions used in this report were calculated in accordance with 47 CFR 73.313 of the Rules and all service contours depicted in this report are based on 360, equally spaced, radials. Area measurements were made with a K&E model 620000 Polar Planimeter and population determinations were made by digitally overlaying the PL-94-171 Census Data Files that extract information from the 1990 US Census.

Certification

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

7/20/98
Date


R. Lee Wheeler

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

Channel 225 C3
 Salem, MO

REFERENCE		DISPLAY DATES
37 38 01 N	CLASS C3	DATA 07-14-98
91 32 05 W	Current rules spacings	SEARCH 07-15-98
----- CHANNEL 225 - 92.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KYLSFM	225A	Ironton	MO	94.9	74.63	142.0	-67.37 *
LI ZCN	37 34 23	90 41 35	0.770 kW	206M	46.4	88.3	
Docker Communications, Inc. BLH971006KI >*To Channel 224A per D97-136							
ALOPEN	224A	Ironton	MO	94.9	74.63	89.0	-14.37 *
AL N	37 34 23	90 41 35	0.000 kW	0M	46.4	55.3	
97-136 >Effective 5-18-98-Reserved for KYLSFM, per D97-136							
KLOZ	224C2	Eldon	MO	310.6	121.64	117.0	4.64
LI CN	38 20 27	92 35 33	31.000 kW	189M	75.6	72.7	
Capital Media, Inc. BLH890828KE							
KCYO	225C2	Ozark	MO	246.9	183.04	177.0	6.04
LI CN	36 58 26	93 25 37	50.000 kW	150M	113.8	110.0	
Ozark Mountain Broadcasting, BLH950427KA							
ALOPEN	225C2	Malden	MO	124.4	188.43	177.0	11.43
AL N	36 39 48	89 47 39	0.000 kW	0M	117.1	110.0	
97-136 >Effective 5-18-98-Reserved for KMAL, per D97-136							
KNSX	227C2	Steelville	MO	39.4	67.92	56.0	11.92
LI CN	38 06 16	91 02 30	8.500 kW	356M	42.2	34.8	
Twenty-One Sound Communicatio BLH961002KF >From Channel 224A Per D87-335							
KZLE	226C	Batesville	AR	185.1	194.08	176.0	18.08
LI CN	35 53 29	91 43 32	100.000 kW	300M	120.6	109.4	
WRD Entertainment, Inc. BLH970905KB >From Channel 226C1 per one-step process (mod of BPH-941021IC)							
KGRC	225C1	Hannibal	MO	2.7	232.90	211.0	21.90
LI CN	39 43 45	91 24 15	100.000 kW	149M	144.8	131.1	
Taylor Broadcasting Company BLH4239							
KGRC.C	225C1	Hannibal	MO	2.7	232.99	211.0	21.99
CP CN	39 43 48	91 24 19	100.000 kW	153M	144.8	131.1	
Taylor Broadcasting Company BPH980507IC 991129							

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

CLASS C3

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KMAL.C	225C3	Malden	MO	130.6	183.16	153.0	30.16
CP ZCN	36 33 08	89 58 42	23.500 kW	53M	113.8	95.1	
	BBC, Inc.				BPH950503IA		970315
>One-Step Application from Channel 224A-*To Channel 225C2 per D97-13							
WILFM	222C	St. Louis	MO	46.2	137.20	96.0	41.20
LI CY	38 28 56	90 23 53	100.000 kW	300M	85.3	59.7	
	WIL Music, Inc.				BLH890707KC		
KELEFM	223A	Mountain Grove	MO	229.0	84.08	42.0	42.08
AP CN	37 08 07	92 14 59	3.000 kW	91M	52.3	26.1	
	Communication Works, Inc.				BMLH970626KC		
ALOPEN	223A	Mountain Grove	MO	229.0	84.08	42.0	42.08
AL N	37 08 07	92 14 59	0.000 kW	OM	52.3	26.1	
	91-352						
>Reserved for KELE-FM per MM D91-352 - Petition for Recon D91-352 fi							
>1							

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

Channel 240 C3
Ironton, MO

REFERENCE		DISPLAY DATES
37 33 46 N	CLASS C3	DATA 07-14-98
90 44 29 W	Current rules spacings	SEARCH 07-15-98
----- CHANNEL 240 - 95.9 MHz -----		

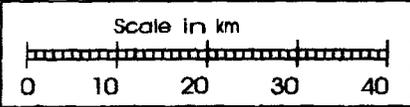
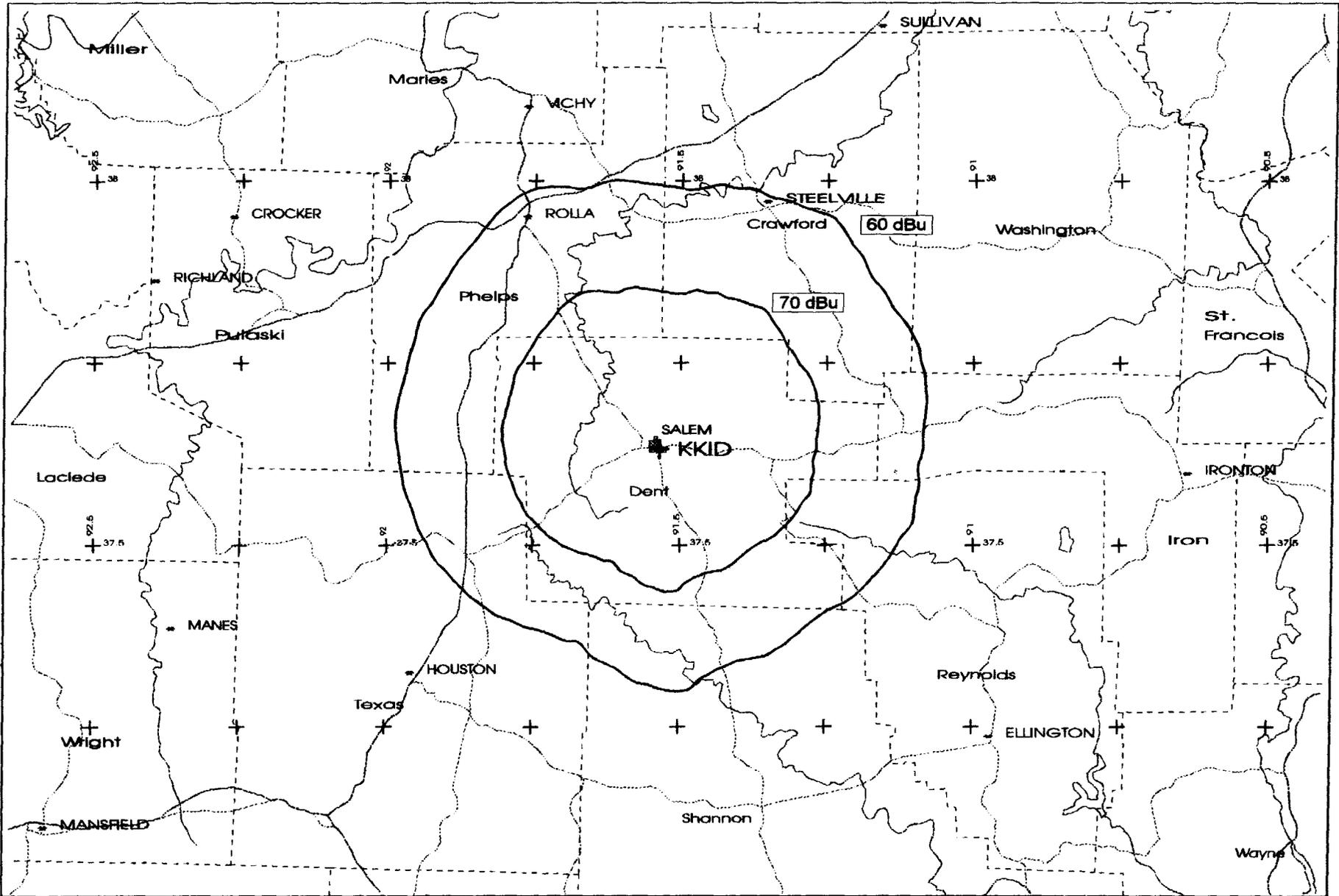
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KKID	240A	Salem	MO	276.7	70.50	142.0	-71.50 *
LI CN	37 38 01	91 32 05	3.000 kW	50M	43.8	88.3	
		Ultra-Sonic Broadcast Station			BLH5034		
WDQNF	240A	Duquoin	IL	67.9	141.99	142.0	-0.01 *
LI CN	38 01 56	89 14 30	6.000 kW	100M	88.3	88.3	
		Duquoin Broadcasting Co.			BMLH961203KD		
KJEZ	238C1	Poplar Bluff	MO	155.3	87.37	76.0	11.37
LI CN	36 50 50	90 19 52	100.000 kW	125M	54.3	47.2	
		Zimmer Radio of Mid-Missouri,			BLH7528		
KSAR	240A	Salem	AR	216.5	162.81	142.0	20.81
LI CN	36 22 51	91 49 28	2.500 kW	98M	101.2	88.3	
		Bragg Broadcasting, Incorpora			BLH7520		
>*To Channel 265A per D96-4. *To Channel 265C2 per one-step app 970							
AD294	294A	Ellington	MO	194.8	38.87	12.0	26.87
AD	37 13 27	90 51 13	0.000 kW	0M	24.2	7.5	
		Lyle Broadcasting Corp.			RM9182		970922
>Counterproposal							
WGKY	240A	Wickliffe	KY	113.2	171.98	142.0	29.98
LI CN	36 56 24	88 57 59	2.450 kW	110M	106.9	88.3	
		Purchase Sound, Inc.			BLH870105KC		
KWWR	239C	Mexico	MO	330.4	209.29	176.0	33.29
LI CN	39 11 42	91 56 25	100.000 kW	303M	130.1	109.4	
		KXEO Radio, Inc.			BLH850806KL		
KTRIFM	240A	Mansfield	MO	251.8	181.05	142.0	39.05
LI CN	37 02 18	92 40 30	3.000 kW	95M	112.5	88.3	
		Pearson Broadcasting of Mansf			BLH910524KC		
KIHT	242C1	St. Louis	MO	17.8	117.97	76.0	41.97
LI ZCN	38 34 24	90 19 30	80.000 kW	313M	73.3	47.2	
		KIHT-FM, Inc.			BLH960605KE		
KIHT	242C1	St. Louis	MO	16.8	121.88	76.0	45.88
LI CN	38 36 47	90 20 09	100.000 kW	168M	75.8	47.2	

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

CLASS C3

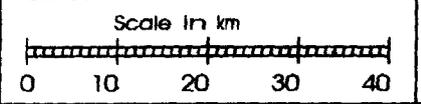
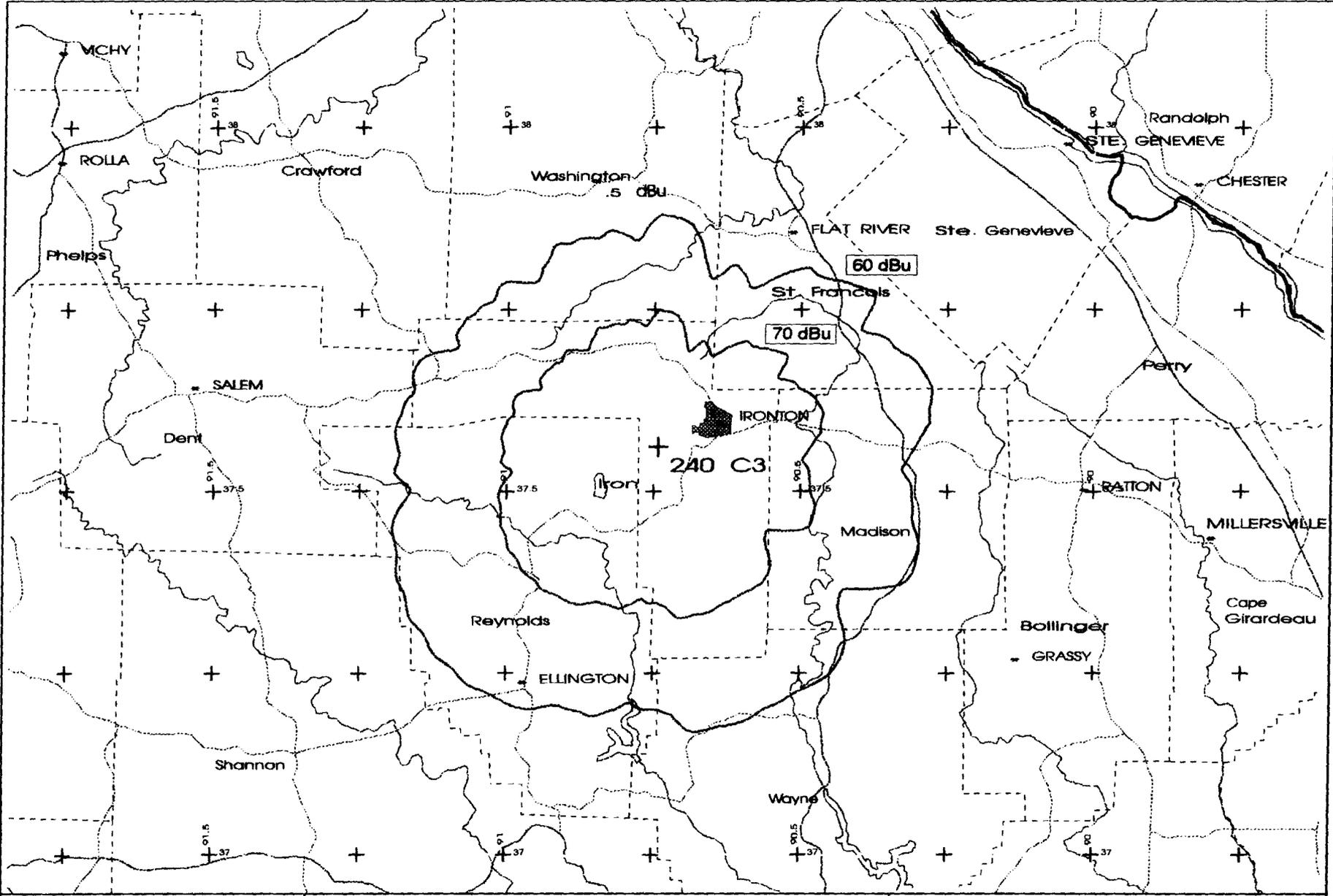
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)

		KIHT-FM, Inc.			BMLH960730KB		
>For Auxiliary Purposes Only							



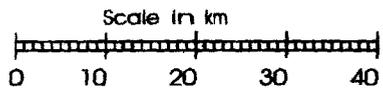
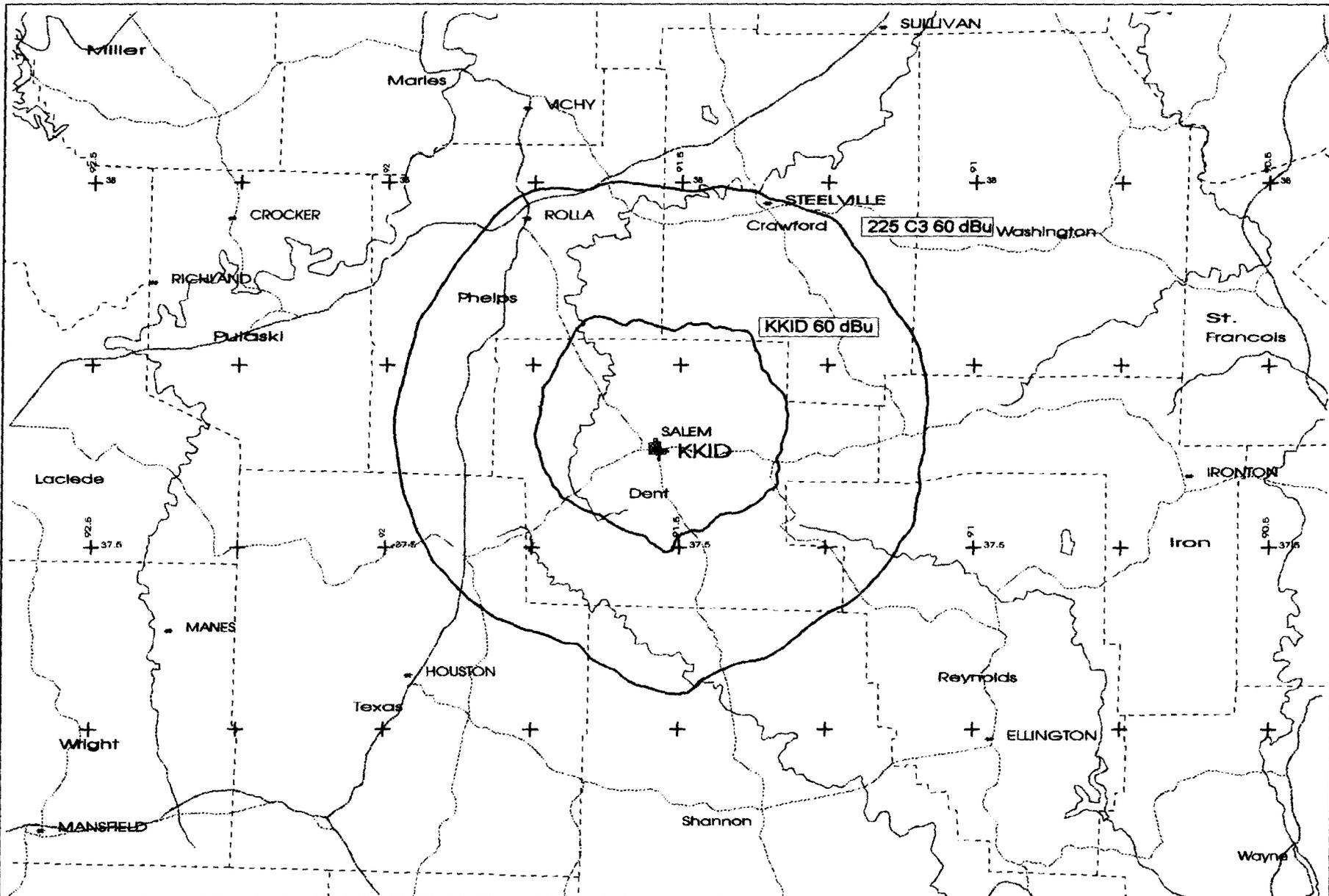
Proposed 225 C3 25 kW 100 m HAAT
N. Lat. 37 38 01 W. Lng. 91 32 05

EXHIBIT 3
L. WHEELER - 07/98



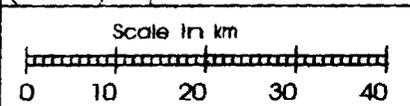
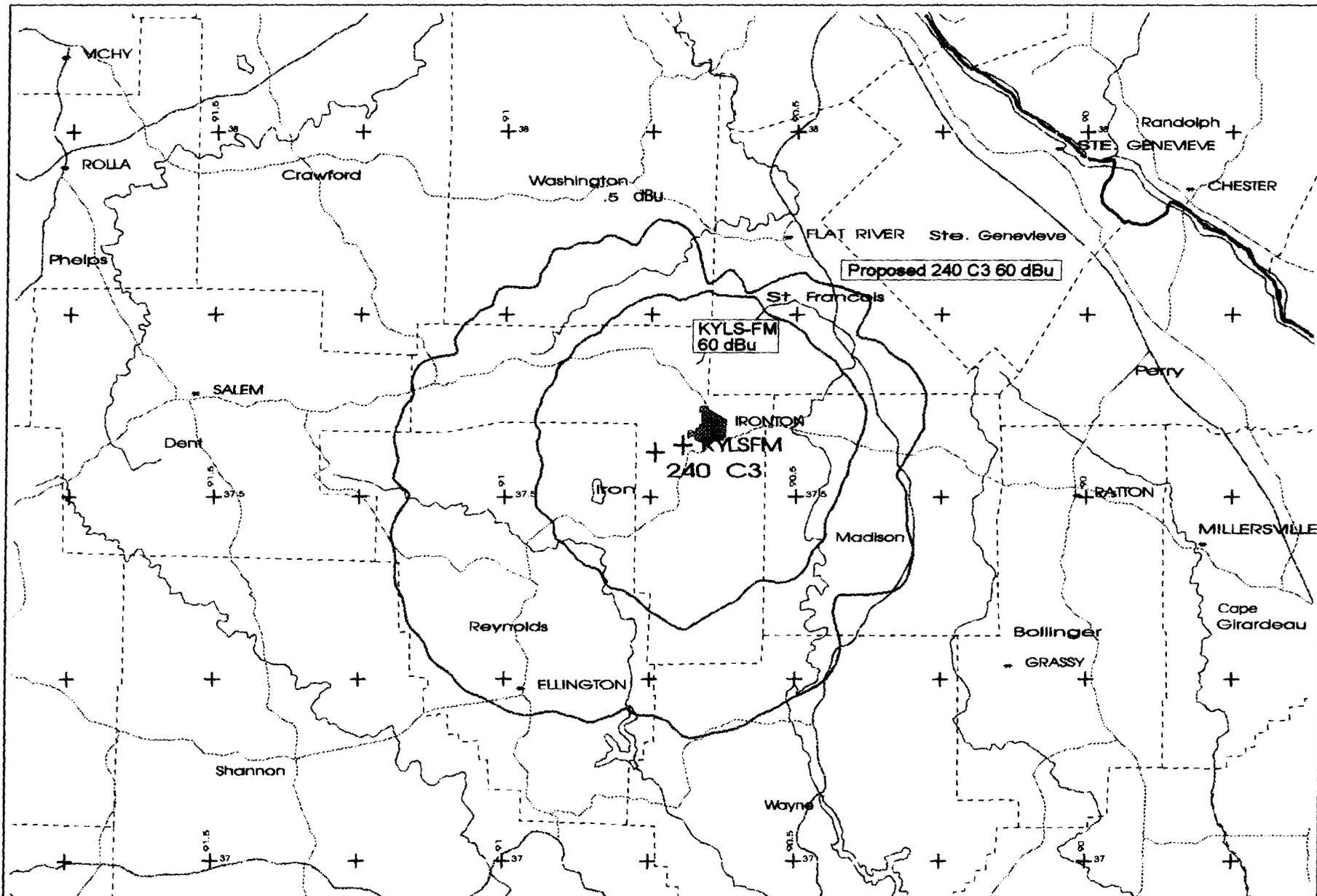
Proposed KYS Ch. 240 C3 25 kW 100m HAAT
 N. Lat. 37 33 46 W. Lng. 90 44 29

EXHIBIT 4
 L. WHEELER - 07/98



Comparative Service Areas KKID Salem, MO
 N. Lat. 37 38 01 W. Lng. 91 32 05

EXHIBIT 5
 L. WHEELER - 07/98



Comparative Service Area KYLS-FM Ironton, MO
N. Lat. 37 33 46 W. Lng. 90 44 29

EXHIBIT 6
L. WHEELER - 07/98

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

Class C3 Allocation Search
Salem, MO

REFERENCE
37 38 01 N
91 32 05 W

Current rules spacings

DISPLAY DATES
DATA 07-14-98
SEARCH 07-17-98

----- CLASS C3 PRECLUSIONS -----

CH.	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
221A	AP221	221A	Dixon	MO	303.8	66.9	142.0	-75.14 *
	AD221	221A	Waynesville	MO	291.0	58.2	142.0	-83.84 *
	ALOPEN	221A	Dixon	MO	304.4	67.5	142.0	-74.47 *
	KKOZFM	221A	Ava	MO	232.1	126.4	142.0	-15.62 *
	WILFM	222C	St. Louis	MO	46.2	137.2	176.0	-38.80 *
222	AP221	221A	Dixon	MO	303.8	66.9	89.0	-22.14 *
	AD221	221A	Waynesville	MO	291.0	58.2	89.0	-30.84 *
	ALOPEN	221A	Dixon	MO	304.4	67.5	89.0	-21.47 *
	WILFM	222C	St. Louis	MO	46.2	137.2	237.0	-99.80 *
	CP222	222A	Thayer	MO	183.4	116.6	142.0	-25.39 *
	KELEFM	223A	Mountain Grove	MO	229.0	84.1	89.0	-4.92 <
	ALOPEN	223A	Mountain Grove	MO	229.0	84.1	89.0	-4.92 <
223	WILFM	222C	St. Louis	MO	46.2	137.2	176.0	-38.80 *
	AP223	223A	Poplar Bluff	MO	134.5	137.4	142.0	-4.57 <
	ALOPEN	223A	Poplar Bluff	MO	133.7	140.1	142.0	-1.95 <
	KELEFM	223A	Mountain Grove	MO	229.0	84.1	142.0	-57.92 *
	AP223	223A	Poplar Bluff	MO	131.1	131.2	142.0	-10.78 *
	ALOPEN	223A	Mountain Grove	MO	229.0	84.1	142.0	-57.92 *
	ALOPEN	224A	Ironton	MO	94.9	74.6	89.0	-14.37 *
224A	KELEFM	223A	Mountain Grove	MO	229.0	84.1	89.0	-4.92 <
	ALOPEN	223A	Mountain Grove	MO	229.0	84.1	89.0	-4.92 <
	ALOPEN	224A	Ironton	MO	94.9	74.6	142.0	-67.37 *
	KLOZ	224C2	Eldon	MO	310.6	121.6	177.0	-55.36 *
	KYLSFM	225A	Ironton	MO	94.9	74.6	89.0	-14.37 *
225	ALOPEN	224A	Ironton	MO	94.9	74.6	89.0	-14.37 *
	KYLSFM	225A	Ironton	MO	94.9	74.6	142.0	-67.37 *
226	KYLSFM	225A	Ironton	MO	94.9	74.6	89.0	-14.37 *
	KBDZ	226A	Perryville	MO	88.8	140.8	142.0	-1.16 <
	KZLE	226C	Batesville	AR	185.1	194.1	237.0	-42.92 *
	KNSX	227C2	Steelville	MO	39.4	67.9	117.0	-49.08 *
227	KNSX	227C2	Steelville	MO	39.4	67.9	177.0	-109.08 *
	KRMSFM	228C2	Osage Beach	MO	298.9	114.4	117.0	-2.63 <
	ALOPEN	228C2	Osage Beach	MO	298.9	114.4	117.0	-2.63 <
228A	KNSX	227C2	Steelville	MO	39.4	67.9	117.0	-49.08 *
	ALOPEN	228C3	Osage Beach	MO	309.1	117.0	153.0	-36.04 *
	KRMSFM	228A	Osage Beach	MO	298.9	114.4	142.0	-27.63 *
	KRMSFM	228C2	Osage Beach	MO	298.9	114.4	177.0	-62.63 *
	AD228	228A	Marble Hill	MO	101.9	131.4	142.0	-10.56 *
	ALOPEN	228C2	Osage Beach	MO	298.9	114.4	177.0	-62.63 *
	KRMSFM	228A	Osage Beach	MO	298.9	114.4	142.0	-27.63 *
229	KRMSFM	228C2	Osage Beach	MO	298.9	114.4	117.0	-2.63 <

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	ALOPEN	228C2	Osage Beach	MO	298.9	114.4	117.0	-2.63 <
	KSD	229C1	St. Louis	MO	45.0	147.9	211.0	-63.05 *
	KSPQ	230C1	West Plains	MO	205.3	77.3	144.0	-66.67 *
230	KSPQ	230C1	West Plains	MO	205.3	77.3	211.0	-133.67 *
	ALOPEN	231A	Bourbon	MO	26.5	55.8	89.0	-33.15 *
231	KSPQ	230C1	West Plains	MO	205.3	77.3	144.0	-66.67 *
	ALOPEN	231A	Bourbon	MO	26.5	55.8	142.0	-86.15 *
232A	ALOPEN	231A	Bourbon	MO	26.5	55.8	89.0	-33.15 *
	KAUV.C	232C3	Viola	AR	194.2	150.7	153.0	-2.27 <
	KATI	232C2	California	MO	322.6	125.0	177.0	-52.04 *
	KKLR	233C1	Poplar Bluff	MO	134.5	137.4	144.0	-6.57 <
233	KKLR	233C1	Poplar Bluff	MO	134.5	137.4	211.0	-73.57 *
	KTTSFM	234C	Springfield	MO	249.5	142.9	176.0	-33.08 *
	KSHE	234C	Crestwood	MO	45.0	148.8	176.0	-27.21 *
234	KKLR	233C1	Poplar Bluff	MO	134.5	137.4	144.0	-6.57 <
	KTTSFM	234C	Springfield	MO	249.5	142.9	237.0	-94.08 *
	KSHE	234C	Crestwood	MO	45.0	148.8	237.0	-88.21 *
235	KTTSFM	234C	Springfield	MO	249.5	142.9	176.0	-33.08 *
	KSHE	234C	Crestwood	MO	45.0	148.8	176.0	-27.21 *
	KAMS	236C1	Mammoth Spring	AR	175.6	121.0	144.0	-23.04 <
236	KAMS	236C1	Mammoth Spring	AR	175.6	121.0	211.0	-90.04 *
	ALOPEN	236C3	Versailles	MO	311.5	128.1	153.0	-24.93 *
	KTKS	236A	Versailles	MO	309.1	137.9	142.0	-4.12 <
	KTKS.A	236C3	Versailles	MO	309.1	137.9	153.0	-15.12 <
	KBDQ.C	237A	Owensville	MO	354.0	73.3	89.0	-15.68 *
237A	KAMS	236C1	Mammoth Spring	AR	175.6	121.0	144.0	-23.04 <
	KBDQ.C	237A	Owensville	MO	354.0	73.3	142.0	-68.68 *
	KJEZ	238C1	Poplar Bluff	MO	129.0	137.9	144.0	-6.08 <
	KKID	240A	Salem	MO	0.0	0.0	42.0	-42.00 *
238	KBDQ.C	237A	Owensville	MO	354.0	73.3	89.0	-15.68 *
	KTOZFM	238C2	Pleasant Hope	MO	253.7	157.8	177.0	-19.21 <
	KJEZ	238C1	Poplar Bluff	MO	129.0	137.9	211.0	-73.08 *
	KKID	240A	Salem	MO	0.0	0.0	42.0	-42.00 *
239	KJEZ	238C1	Poplar Bluff	MO	129.0	137.9	144.0	-6.08 <
	KWWR	239C	Mexico	MO	348.6	176.9	237.0	-60.10 *
	KKID	240A	Salem	MO	0.0	0.0	89.0	-89.00 *
240A	KSAR	240A	Salem	AR	190.6	141.4	142.0	-0.60 <
	KKID	240A	Salem	MO	0.0	0.0	142.0	-142.00 *
	KTRIFM	240A	Mansfield	MO	237.1	120.7	142.0	-21.27 *
241	KKID	240A	Salem	MO	0.0	0.0	89.0	-89.00 *
	KLRQ	241C	Clinton	MO	299.0	196.7	237.0	-40.29 *
242	KKID	240A	Salem	MO	0.0	0.0	42.0	-42.00 *
	KIHT	242C1	St. Louis	MO	43.5	151.2	211.0	-59.77 *
	KIHT	242C1	St. Louis	MO	45.0	148.8	211.0	-62.21 *
243	KKID	240A	Salem	MO	0.0	0.0	42.0	-42.00 *
	KLTD	243C2	Sparta	MO	244.6	172.9	177.0	-4.11 <

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CH.	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
	AP244	244A	Bourbon	MO	32.1	59.9	89.0	-29.10 *
	KCMQ.C	244C1	Columbia	MO	337.5	127.3	144.0	-16.69 <
244A	AP244	244A	Bourbon	MO	32.1	59.9	142.0	-82.10 *
	KCMQ.C	244C1	Columbia	MO	337.5	127.3	211.0	-83.69 *
	KAHR	244A	Poplar Bluff	MO	135.6	134.2	142.0	-7.79 <
	KUPH	245C2	Mountain View	MO	197.9	74.9	117.0	-42.09 *
245	AP244	244A	Bourbon	MO	32.1	59.9	89.0	-29.10 *
	KCMQ.C	244C1	Columbia	MO	337.5	127.3	144.0	-16.69 <
	KUPH	245C2	Mountain View	MO	197.9	74.9	177.0	-102.09 *
	KDAA	248A	Rolla	MO	331.2	41.9	42.0	-0.11 <
246	KUPH	245C2	Mountain View	MO	197.9	74.9	117.0	-42.09 *
	KXOKFM	246C1	Florissant	MO	28.7	145.4	211.0	-65.56 *
	AD247	247A	Arcadia	MO	93.8	79.8	89.0	-9.21 *
	KXUS	247C1	Springfield	MO	249.7	140.8	144.0	-3.18 <
	KDAA	248A	Rolla	MO	331.2	41.9	42.0	-0.11 <
247	AD247	247A	Arcadia	MO	93.8	79.8	142.0	-62.21 *
	DE247	247A	Marble Hill	MO	101.9	131.4	142.0	-10.56 *
	KBGJ.C	247A	Marble Hill	MO	101.9	131.6	142.0	-10.36 *
	KXUS	247C1	Springfield	MO	249.7	140.8	211.0	-70.18 *
	KDAA	248A	Rolla	MO	331.2	41.9	89.0	-47.11 *
248	AD247	247A	Arcadia	MO	93.8	79.8	89.0	-9.21 *
	KXUS	247C1	Springfield	MO	249.7	140.8	144.0	-3.18 <
	KOEA	248C2	Doniphan	MO	151.1	132.2	177.0	-44.77 *
	KDAA	248A	Rolla	MO	331.2	41.9	142.0	-100.11 *
	KHCR	249C3	Potosi	MO	61.7	76.9	99.0	-22.05 <
249A	KDAA	248A	Rolla	MO	331.2	41.9	89.0	-47.11 *
	KHCR	249C3	Potosi	MO	61.7	76.9	153.0	-76.05 *
	KFBDFM	250A	Waynesville	MO	291.3	60.4	89.0	-28.63 *
250	KDAA	248A	Rolla	MO	331.2	41.9	42.0	-0.11 <
	KHCR	249C3	Potosi	MO	61.7	76.9	99.0	-22.05 <
	KFBDFM	250A	Waynesville	MO	291.3	60.4	142.0	-81.63 *
	KTLOFM	250C2	Mountain Home	AR	208.5	162.1	177.0	-14.93 <
	KOZX	251A	Cabool	MO	223.7	76.9	89.0	-12.14 *
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.62 <
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.64 <
251	KDAA	248A	Rolla	MO	331.2	41.9	42.0	-0.11 <
	KFBDFM	250A	Waynesville	MO	291.3	60.4	89.0	-28.63 *
	KYKY	251C1	St. Louis	MO	45.0	148.8	211.0	-62.21 *
	KYKY	251C1	St. Louis	MO	45.0	148.8	211.0	-62.21 *
	KOZX	251A	Cabool	MO	223.7	76.9	142.0	-65.14 *
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.62 <
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.64 <
252A	KOZX	251A	Cabool	MO	223.7	76.9	89.0	-12.14 *
	KFCM.C	252C3	Cherokee Village	AR	179.0	150.8	153.0	-2.18 <
	KFMZ	252C2	Columbia	MO	332.9	144.7	177.0	-32.28 *
	KTJJ	253C	Farmington	MO	83.5	87.4	176.0	-88.62 *

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CH.	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
253	KTJJ	253C	Farmington	MO	83.5	87.4	176.0	-88.64 *
	KTJJ	253C	Farmington	MO	83.5	87.4	237.0	-149.62 *
254	KTJJ	253C	Farmington	MO	83.5	87.4	237.0	-149.64 *
	KTJJ	253C	Farmington	MO	83.5	87.4	176.0	-88.62 *
255	KTJJ	253C	Farmington	MO	83.5	87.4	176.0	-88.64 *
	KWTOFM	254C1	Springfield	MO	248.7	169.2	211.0	-41.77 *
	KFLW	255A	St. Robert	MO	302.8	50.5	89.0	-38.50 *
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.62 <
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.64 <
	KFLW	255A	St. Robert	MO	302.8	50.5	142.0	-91.50 *
256	KTMO	255C	Kennett	MO	144.0	205.2	237.0	-31.81 *
	KFUOFM	256C	Clayton	MO	45.0	148.8	176.0	-27.21 *
	KFUOFM	256C	Clayton	MO	43.4	154.5	176.0	-21.48 <
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.62 <
	KTJJ	253C	Farmington	MO	83.5	87.4	96.0	-8.64 <
	KFLW	255A	St. Robert	MO	302.8	50.5	89.0	-38.50 *
	KYOOFM	256C3	Half Way	MO	275.9	153.0	153.0	-0.03 <
	KFUOFM	256C	Clayton	MO	45.0	148.8	237.0	-88.21 *
	KFUOFM	256C	Clayton	MO	43.4	154.5	237.0	-82.48 *
	KUNQ.C	257C2	Houston	MO	217.4	75.6	117.0	-41.39 *
257A	KUNQ	257A	Houston	MO	223.6	46.7	89.0	-42.34 *
	KFUOFM	256C	Clayton	MO	45.0	148.8	176.0	-27.21 *
	KFUOFM	256C	Clayton	MO	43.4	154.5	176.0	-21.48 <
	KUNQ.C	257C2	Houston	MO	217.4	75.6	177.0	-101.39 *
	KCLRFM	257C2	Boonville	MO	325.5	154.7	177.0	-22.32 <
	KUNQ	257A	Houston	MO	223.6	46.7	142.0	-95.34 *
	ALOPEN	258C3	Bismarck	MO	88.8	87.1	99.0	-11.93 <
	AP258	258C3	Bismarck	MO	92.0	81.1	99.0	-17.91 <
	AP258	258C3	Bismarck	MO	91.2	82.1	99.0	-16.94 <
	AP258	258C3	Bismarck	MO	91.5	78.1	99.0	-20.86 <
258	KUNQ.C	257C2	Houston	MO	217.4	75.6	117.0	-41.39 *
	KUNQ	257A	Houston	MO	223.6	46.7	89.0	-42.34 *
	ALOPEN	258C3	Bismarck	MO	88.8	87.1	153.0	-65.93 *
	AP258	258C3	Bismarck	MO	92.0	81.1	153.0	-71.91 *
	AP258	258C3	Bismarck	MO	91.2	82.1	153.0	-70.94 *
	AP258	258C3	Bismarck	MO	91.5	78.1	153.0	-74.86 *
	KTTRFM	259C3	St. James	MO	346.8	49.8	99.0	-49.17 *
	ALOPEN	258C3	Bismarck	MO	88.8	87.1	99.0	-11.93 <
	AP258	258C3	Bismarck	MO	92.0	81.1	99.0	-17.91 <
	AP258	258C3	Bismarck	MO	91.2	82.1	99.0	-16.94 <
259	AP258	258C3	Bismarck	MO	91.5	78.1	99.0	-20.86 <
	KTTRFM	259C3	St. James	MO	346.8	49.8	153.0	-103.17 *
	KMAC	259C2	Gainesville	MO	216.0	142.4	177.0	-34.56 *
	KTTRFM	259C3	St. James	MO	346.8	49.8	99.0	-49.17 *
	KFAV	260C3	Warrenton	MO	17.6	140.5	153.0	-12.50 <
260	KBFL	260A	Buffalo	MO	270.7	128.8	142.0	-13.18 *