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March 15, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
The Portals Complex
445 12th Street, S.W.
Washington, D.C. 20554

Stop Code 1800D5
Attn: Allocations Branch

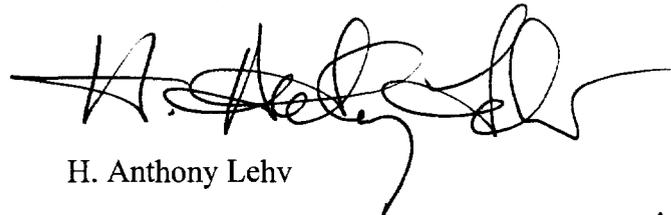
Re: KJUN(FM), Tillamook, Oregon
Petition For Rule Making To Change Community
of License From Tillamook to Scappoose, Oregon

Dear Ms. Salas:

On behalf of Thunderegg Wireless, L.L.C., licensee of radio station KJUN(FM), Tillamook, Oregon (formerly KTIL-FM), we hereby submit an original and four (4) copies of a Petition for Rule Making seeking to amend the FM Table of Allotments to reallocate Channel 281C3 from Tillamook to Scappoose, Oregon and to modify KJUN(FM)'s license to specify Scappoose as its community of license. No fee is required for this filing.

If any questions should arise concerning this filing, please contact the undersigned counsel.

Respectfully submitted,


H. Anthony Lehv

cc: Mr. Lance Anderson
Mr. George Kriste
Mr. Lance Anderson
Mr. John Lundin

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

RECEIVED

MAR 15 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,) MM Docket No. _____
FM Broadcast Stations.) RM- _____
(Tillamook and Scappoose, Oregon))
)

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Thunderegg Wireless, L.L.C. ("*Thunderegg*"), licensee of radio station KJUN(FM), Tillamook, Oregon,^{1/} by its attorneys, and pursuant to Section 1.420(i) of the Commission's rules, hereby submits a Petition For Rulemaking seeking to change the community of license of KJUN(FM) from Tillamook to Scappoose, Oregon. The proposed changes would result in a preferential arrangement of the allotments, would provide the city of Scappoose with its first local transmission service and would provide an additional reception service to more than 700,000 persons.

Thunderegg accordingly requests that the Commission issue a Notice of Proposed Rulemaking proposing to modify the FM Table of Allotments to reallocate Channel 281C3 to Scappoose and proposing to modify KJUN(FM)'s license to specify Scappoose as its community

^{1/} Thunderegg acquired the license for KJUN(FM) on February 24, 1999. Previously, KJUN(FM) used the call sign KTIL-FM and the Engineering Statement of DuTreil, Lundin & Rackley, Inc. attached as Exhibit A to this Petition ("*Engineering Statement*") refers to the station's prior call sign in Exhibits 2A and 2B.

of license. Thunderegg will file an application for Channel 281C3 at Scappoose if the channel is allotted to that community.

DISCUSSION

Under Section 1.420(i) of the Commission's rules and the Commission's community of license change policies, the Commission may modify a station's licensee to specify a new community of license without affording interested parties an opportunity to file competing expressions of interest if (a) the proposed community of license is an identifiable community; (b) the new allotment would be mutually exclusive with the old allotment; (c) looking at the totality of factors, the new allotment would result in a preferential arrangement of allotments; and (d) the relocation would not deprive a community of its sole local transmission outlet. *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989) ("*Community of License Change Order*"), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*Community Recon Order*"); *LaGrange and Rollingwood, Texas*, 10 FCC Rcd 3337 (1995). The community of license change proposed by Thunderegg would satisfy all of these community of license change criteria.

I. Scappoose Is A Community Deserving Of An FM Channel Allotment.

Scappoose, Oregon, is an incorporated city with a population of 4,650 persons.^{2/} Located in southern Columbia County, Scappoose, which was incorporated in 1921, has its own Zip Code (97056), post office, library and telephone directory. Scappoose is governed by a Mayor and a

^{2/} According to the 1990 United States Census, taken almost ten years ago, Scappoose's population was 3,529. The more precise figure of 4,650 persons was confirmed by a 1997 Portland State University population study. Tillamook, KJUN(FM)'s current community of license, has a population of 4,001 persons.

six-member City Council. Other prominent city officials include a City Manager, City Attorney, municipal judge, City Recorder, Public Works Director and an eight-member Planning Commission that regulates local building codes. Scappoose is served by its own local fire and police departments, its own water system and a small airport.

Scappoose residents support at least twelve churches, three banks, more than a dozen doctors, several senior citizens' facilities and the Scappoose School District, which oversees two elementary schools, a middle school and a high school. Two weekly newspapers (*The St. Helens Chronicle* and *The South Country Spotlight*) and a local TCI cable channel cover the newsworthy events of Scappoose. Additionally, Scappoose is home to a large bus manufacturer, a sizable pickle factory, an industrial area, myriad retail establishments and many other manufacturing-type businesses.

The Commission has allotted channels to numerous communities with smaller populations and fewer services than Scappoose. *See Beaver Dam and Brownsville, Kentucky*, 1998 FCC LEXIS 4585, DA 98-1724 (rel. Sept. 4, 1998) (allotting channel to Brownsville, population 897); *Canton and Glasford, Illinois*, 1998 FCC LEXIS 4584, DA 98-1723 (rel. Sept. 4, 1998) (allotting channel to Glasford, population 1,115). Indeed, in allotting a channel to Ore City, Texas, population 898, the Commission stressed that Ore City was "clearly" a definable community for allotment purposes and was deserving of its own channel despite its size. *Daingerfield and Ore City, Texas*, 1998 FCC LEXIS 5493, DA 98-2136 (rel. Oct. 23, 1998). Under these circumstances, Scappoose is unquestionably a community and is entitled to its first local transmission service.

II. The New Allotment Is Mutually Exclusive With The Existing Allotment.

KJUN(FM) is licensed to operate on channel 281C3 (104.1 MHz) at Tillamook.^{3/} Thunderegg proposes to change KJUN(FM)'s community of license to Scappoose, with a corresponding change in transmitter site. Channel 281C3 can be allotted to Scappoose in conformity with the minimum spacing requirements of Section 73.207(a) of the Commission's rules. Engineering Statement at pp. 3-4. However, the minimum required spacing between co-channel C3 stations under the Commission's rules is 153 kilometers (95 miles). 47 C.F.R. § 73.207(a). Because Scappoose is located only 82.5 kilometers (51.2 miles) east-northeast of Tillamook, the new allotment, while fully-spaced, would be mutually exclusive with the existing allotment. Engineering Statement at pp. 1-2.

If licensed to Scappoose, KJUN(FM) proposes to operate from an antenna structure with a height of 30 meters (100 feet) located on Bald Hill, a site approximately 6.7 kilometers (4.2 miles) west-northwest of Scappoose. Engineering Statement at p. 1. From this site, KJUN(FM) would comply with Sections 73.315 of the rules, providing line of sight coverage and principal community contour (70 dBu) coverage to Scappoose. Engineering Statement at p. 4.

Scappoose is not located within any census-designated Urbanized Area. From the proposed transmitter site in Scappoose,^{4/} KJUN(FM)'s predicted 3.16 mV/m (70 dBu) contour would encompass approximately ten percent (10%) of the Portland, Oregon-Vancouver, Washington, Urbanized Area. Engineering Statement at pp. 4-5. Because KJUN(FM) would not

^{3/} Last year, the Commission denied a "one-step" upgrade application to change KJUN(FM)'s (then KTIL-FM's) channel to 281C1. *Chehalis, Washington*, DA 98-2053, 1998 FCC LEXIS 5316 (rel. Oct. 16, 1998).

^{4/} The reference coordinates for the Scappoose allotment are 45-46-58, 122-57-13.

be within an Urbanized Area or cover more than 50% of an Urbanized Area with its 3.16 mV/m contour, no “Tuck” analysis is required and the allotment to Scappoose would not be considered as a Portland service. *See Headland, Alabama, and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995), *citing Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).^{5f} Thunderegg recognizes that because Scappoose is within 320 kilometers (220 miles) of the Canadian border, concurrence from the Canadian government is required to permit the reallocation to Scappoose. Engineering Statement at p. 3.

III. The Proposed Change Would Result In A Preferential Arrangement Of Allotments.

There are no primary or secondary radio or television stations licensed to Scappoose, and KJUN(FM) would be the community’s first local transmission service. Conversely, eleven primary and secondary radio and television stations are licensed to Tillamook, including three full-service radio stations: KJUN(FM), KTIL-FM and KMBD(AM). There also is a pending application for a new station on Channel 216A, as well as three existing FM translators and four existing low power television stations.^{6f} Engineering Statement at p. 2.

Removing Channel 281C3 from Tillamook and allotting it to Scappoose therefore will result in a preferential arrangement of allotments.^{7f} Retaining the 281C3 allotment at Tillamook

^{5f} KJUN(FM)’s predicted 3.16 mV/m (70 dBu) contour would approach, but not reach, the Longview, Oregon, and Salem, Oregon, Urbanized Areas.

^{6f} Those stations are FM Translators K205CY, K211BM, LPTV stations K35CR, K40EG, K43EJ and K52ET, and an application for a new FM Translator on Channel 220.

^{7f} The Commission’s allotment priorities are (1) First full-time aural service; (2) Second full-time aural service; (3) first local service; and (4) Other public interest matters. Equal weight is given to priorities (2) and (3). *Community of License Change Order*, 4 FCC Rcd at 4876, fn. 8.

would serve only priority (4), other public interest matters, while allotting Channel 281C3 to Scappoose would serve priority (3) by permitting the addition of a first local transmission service in Scappoose. Moreover, it is possible to add two full-service and fully-spaced Class A allotments to Tillamook on Channel 227A and Channel 240A. Engineering Statement at p. 3.

The public interest benefits from granting Scappoose its first local transmission service far outweigh any benefits of retaining Channel 281C3 in Tillamook. KJUN(FM)'s current predicted 1 mV/m (60 dBu) service contour encompasses 2,890 square kilometers (1116 square miles) and approximately 21,447 residents.^{8/} From Scappoose, KJUN(FM)'s predicted 1 mV/m service contour would encompass 4,803 square kilometers (1,854 square miles) and 725,689 persons, a net service gain of 704,242 persons. Engineering Statement at pp. 5-6. This enormous service gain is larger than many community of license change petitions approved by the Commission and warrants consideration of this Petition. *See Pottsboro, Roxton and Whitesboro, Texas*, DA 99-318 (rel. Feb. 12, 1999) (approving community of license change where service gain was only 188,682 persons).

The Commission's traditional concern with removing existing service from a community, *Community Recon Order*, 5 FCC Rcd at 7097, should be allayed here because Tillamook will retain two full-time local transmission services; KJUN-FM and KMBD(AM).^{9/} Additionally, approximately 70% of the 21,447 persons now predicted to receive KJUN(FM) will continue to be "well-served" despite the loss of service from KJUN(FM). Engineering Statement at pp. 6-

^{8/} Because these figures predict service using maximum Class C3 facilities, they significantly overstate KJUN(FM)'s actual current service area which is 13,321 persons over an area of 580 square kilometers (224 square miles). Engineering Statement at p. 5 & fn. 1.

^{9/} All of Tillamook and the entire loss area created by the removal of KJUN(FM) also will be served by KEX(AM), Portland, Oregon.

7.^{10/} Approximately 80% of the loss area will receive service from at least four services, and all but 19 persons in the loss area will receive service from at least three services. Engineering Statement at p. 7.^{11/}

If the Commission considers the predicted service from two allotments that can be added to Tillamook, then all but 19 persons in KJUN(FM)'s predicted service area would be "well-served." See *LaGrange and Rollingwood, Texas*, 10 FCC Rcd 3337 (1995) (a community is "well-served" if it receives at least five aural services); Engineering Statement at p. 8. Moreover, any loss of service to Tillamook is wholly outweighed by the thirty-five-fold increase in population served from Scappoose and the introduction of a first local transmission service there.

Accordingly, the Commission should consider allotting Channel 281C3 to Scappoose as set forth below:

Community	Channel Number	
	Present	Proposed
Tillamook, Oregon	231C3, 281C3	231C3
Scappoose, Oregon	----	281C3

^{10/} No white or gray areas would be created by changing KJUN(FM)'s community of license.

^{11/} The actual service loss would be smaller because the loss figures presented are based on the maximum predicted Class C3 facilities and not on KJUN(FM)'s current facilities, which are less powerful.

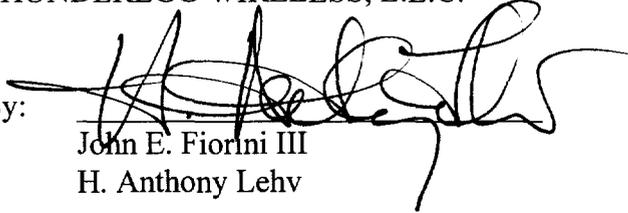
CONCLUSION

Scappoose, Oregon, is an incorporated city of 4,650 residents deserving of a first local transmission service. By relocating to Scappoose, Thunderegg proposes a net service gain of over 700,000 persons. The new allotment is mutually exclusive with KJUN(FM)'s existing facilities in Tillamook and would result in a preferential arrangement of the allotments. A substantial majority of the persons now predicted to receive KJUN(FM) would remain well-served by other existing services and two new Class A allotments can be added in Tillamook.

In light of these facts, the Commission should issue a notice of Proposed Rulemaking proposing to reallocate Channel 281C3 from Tillamook to Scappoose.

Respectfully Submitted,

THUNDEREGG WIRELESS, L.L.C.

By: 

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H. Anthony Lehv

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Its Attorneys

Dated: March 15, 1999

EXHIBIT A
Engineering Statement of
DuTreil, Lundin & Rackley, Inc.

TECHNICAL STATEMENT
SUPPORTING A PETITION FOR RULE MAKING
TO CHANGE CITY OF FM ALLOTMENT

This Technical Statement supports a Petition for Rule Making (PRM) from Thunderegg Wireless, LLC to change the city of allotment for FM broadcast station KJUN on channel 281C3 (104.1 MHz) from Tillamook, Oregon to Scappoose, Oregon.

Section 73.202 of the Federal Communications Commission (FCC) rules currently shows channel 281C3 allotted to Tillamook, Oregon. It is proposed to change the city for this channel 281C3 allotment to Scappoose, Oregon. The geographic coordinates assumed for the Scappoose allotment reference point are 45-46-58, 122-57-13. These coordinates are for a structure having a height of 30 meters (100 feet) on Bald Hill, approximately 6.7 kilometers (4.2 miles) west-northwest of Scappoose (see Figure 1).

According to 1990 US Census information for Oregon, Scappoose is an incorporated city located in Columbia County. The Scappoose population is 3,529 people. The incorporated city of Tillamook is located in Tillamook County and has a population of 4,001 people. The city of

Scappoose is located approximately 82.5 kilometers (51.2 miles) east-northeast of Tillamook.

A review of the FCC broadcast databases has been undertaken to determine the broadcast stations assigned to Tillamook, Oregon and Scappoose, Oregon. The following is a list of the assignments identified with Tillamook, Oregon.

<u>Call</u>	<u>Service</u>	<u>Channel</u>	<u>Technical Facilities</u>
KMBD	AM-Lic.	1590 kHz	5 kW-D, 1 kW-N, DA-N, U
K205CY	FM-Tran.	205	0.05 kW, 40 m
K211BM	FM-Tran.	211	0.035 kW-DA, 12 m
New app.	FM-Tran	220	0.01 kW, 398 m
New	FM-App.	216A	0.14 kW, 356 m
KTIL-FM	FM-CP	231C3	1.8 kW, 357 m
KJUN	FM-Lic.	281C3	6.5 kW, -60 m
K35CR	LPTV-Lic.	35	1.34 kW-DA, 841 m
K40EG	LPTV-Lic.	40	1.13 kW-DA, 841 m
K43EJ	LPTV-Lic.	43	1.13 kW-DA, 841 m
K52ET	LPTV-Lic.	52	1.0 kW-DA, 841 m

There are 1 authorized AM station, 2 authorized FM stations, 2 authorized FM translator, and 4 authorized low power television (LPTV) stations. Changing channel 281C3's city of allotment from Tillamook to Scappoose will not remove the only radio service assigned to Tillamook.

Furthermore, channel 227A (93.3 MHz) and/or channel 240A (95.9 MHz) can be allotted to Tillamook in compliance with the FCC's minimum separation requirements, as a replacement(s) for channel 281C3 being reallocated to Scappoose. Figures 2A and 2B show the areas to locate channels 227A and 240A. The area to locate is approximately 5 kilometers west of Tillamook. The site of Station KTIL-FM on channel 231C3 at Tillamook (45-27-59, 123-55-11) is shown for reference.

There are no AM, FM, TV, FM translators and LPTV stations assigned to Scappoose at this time. This includes consideration of authorized operations, pending applications, and petitions for rule making.

Figure 3 is a separation study for channel 281C3 at the assumed allotment reference point. As shown, there are no short-spacings. The Scappoose allotment reference point is approximately 275 kilometers (171 miles) south of the Canadian border. It is recognized that the proposal may require Canadian concurrence. The FCC is respectfully requested to forward this proposal to Canada for its consideration.

It is noted the FCC's FM database still contains a comment field on the KJUN license record and a channel 282C1 proposed allotment record with respect to KJUN's one-step upgrade application (BPH-970224IC). It is believed

this information (KJUN license comment field and channel 282C1 allotment record) can be deleted from the FCC's FM database since the KJUN one step upgrade application was denied by the FCC in the Report and Order in MM Docket No. 97-7 (released October 16, 1998).

Figure 4 is a map showing the minimum separation arcs in accordance with Section 73.207 of the FCC rules from pertinent surrounding assignments. The assumed channel 281C3 Scappoose, Oregon allotment reference point is identified. As shown, the allotment reference point meets all of the FCC's minimum separation requirements (Section 73.207 of the FCC rules) and is within sufficient distance of Scappoose for principal city coverage with maximum Class C3 facilities.

A review of the 1990 US Census information for Oregon indicates there are 3 urbanized areas near the assumed 3.16 mV/m (70 dBu) contour from the proposed allotment reference point with maximum Class C3 transmitting facilities (i.e., a 23.2 km circle). These 3 census designated urbanized areas in Oregon are: Longview (OR-WA), Portland-Vancouver (OR-WA), and Salem (OR). Figure 5 shows these urbanized areas in relation to the assumed channel 281C3 allotment 3.16 mV/m contour.

Thunderegg Wireless, LLC

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The assumed channel 281C3 allotment 3.16 mV/m contour does not encompass any portion of the Longview and Salem urbanized areas.

Figure 6 is a map from the 1990 US Census book for Oregon showing the Portland-Vancouver, OR-WA urbanized area (shaded). A portion of the assumed channel 281C3 allotment 3.16 mV/m contour is also shown. Although the assumed channel 281C3 allotment 3.16 mV/m contour covers some of the Portland-Vancouver urbanized area (about 10%), it obviously covers much less than 50% of the urbanized area.

Assuming maximum Class C3 transmitting facilities (i.e., 25 kW, 100 m), the population (1990 US Census) within the predicted 1 mV/m (60 dBu) contours has been estimated for the present KJUN site and the proposed Scappoose allotment reference point. The estimated population within the 1 mV/m contour (39.1 km circle) for the present KJUN channel 281C3 site near Tillamook is 21,447 people. The land area within this contour is approximately 2,890 square kilometers (1116 square miles).¹ The estimated population within the 1 mV/m contour (39.1 km circle) for the proposed Scappoose channel 281C3 allotment reference point is 725,689 people. The land area within

¹ Maximum class C3 facilities (25 kW, 100 m) have been assumed for the current channel 281C3 allotment at Tillamook even though station KJUN operates with an ERP of 6.5 kW and antenna HAAT of -60 meters. The estimated population and land area within the predicted 1 mV/m contour for the actual KJUN transmitting facilities is 13,321 people and 580 square kilometers (224 square miles).

this contour is approximately 4,803 square kilometers (1,854 square miles). The proposed Scappoose allotment will potentially reach over 700,000 more people than the current allotment at Tillamook.

A study of other radio services available was performed to determine if any "white" area (0 service or no other radio service), "gray" area (1 other radio service available) or underserved area (less than 5 other radio services available) results with the removal of the Tillamook channel 281C3 allotment. A similar study was performed for the proposed channel 281C3 allotment at Scappoose ("white," "gray" or underserved area service gained). In accordance with FCC policy, maximum Class C3 facilities and uniform antenna HAAT (i.e., 39.1 km circles) were assumed for the 1 mV/m contours at Tillamook (KJUN site) and Scappoose (allotment reference point). Similarly, the 1 mV/m contours of other commercial FM facilities were assumed to be circles for the maximum permitted facilities for the class, except for Class C stations. For commercial Class C stations, a circle representing the 1 mV/m contour for the present transmitting facilities was used (i.e., uniform antenna HAAT). For non-commercial, educational (NCE) FM stations, uniform antenna HAAT was assumed along with the current transmitting power. Where authorized to FM stations, directional antenna patterns were considered based on uniform antenna HAAT. For AM stations, the night

interference free (NIF) groundwave contour was used with soil conductivities from FCC Figure M3. For Class A AM stations (formerly Class I), the 0.5 mV/m groundwave contour was employed.

Figure 7A is a map showing the 1 mV/m contour for the channel 281C3 allotment at Tillamook, and the contours for the other FM and AM services to that area. Figure 7B is a list of the FM and AM assignments shown on Figure 7A. The following is a breakdown of the population (1990 census) and land area for the other radio services available to the Tillamook channel 281C3 allotment mV/m service area.

<u>Other Radio Services Available</u>	<u>Population</u>	<u>Land Area</u>
0	0	0 sq. km.
1	0	0
2	19	2
3	2,461	106
4	4,312	348
5 or more	<u>14,655</u>	<u>2,434</u>
	21,447	2,890

Figure 7C shows the other radio services if channels 227A and 240A were considered as FM allotments for Tillamook (see Figures 2A and 2B as discussed above). The following is a breakdown of the population and land area on this basis.

<u>Other Radio Services Available</u>	<u>Population</u>	<u>Land Area</u> 0 sq. km.
0	0	0
1	0	0
2	0	0
3	0	0
4	19	2
5 or more	<u>21,428</u>	<u>2,888</u>
	21,447	2,890

Figure 8A is a map showing the 1 mV/m contour for the proposed channel 281C3 allotment at Scappoose, and the contours for other FM services to that area. Figure 8B is a listing of the radio assignments considered. Five (5) FM stations cover all of the 1 mV/m contour for the proposed allotment. Hence, no other radio stations were considered. The following is a breakdown of the population and land area for the other radio services available to the proposed Scappoose channel 281C3 allotment 1 mV/m service area.

<u>Other Radio Services Available</u>	<u>Population</u>	<u>Land Area</u> 0 sq. km.
0	0	0
1	0	0
2	0	0
3	0	0
4	0	0
5 or more	725,689	4,803

Thunderegg Wireless, LLC

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In summary, it is believed the foregoing provides sufficient justification for the FCC to reallocate FM channel 281C3 from Tillamook, Oregon to Scappoose, Oregon.



John A. Lundin
du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL 34237-6019

(941) 329-6000

March 9, 1999

47' 30"

45° 47' 30"

5070

CH 281C3 Allotment
 Reference Coordinates:
 45° 46' 58" N
 122° 57' 13" W

CHAPMAN, OREGON
 45122-G8-TF-024

 1990
 DMA 1475 IV SW-SERIES V892

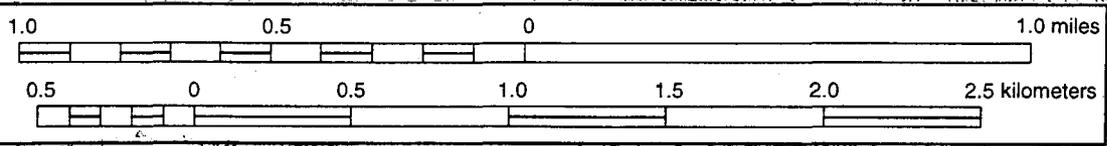
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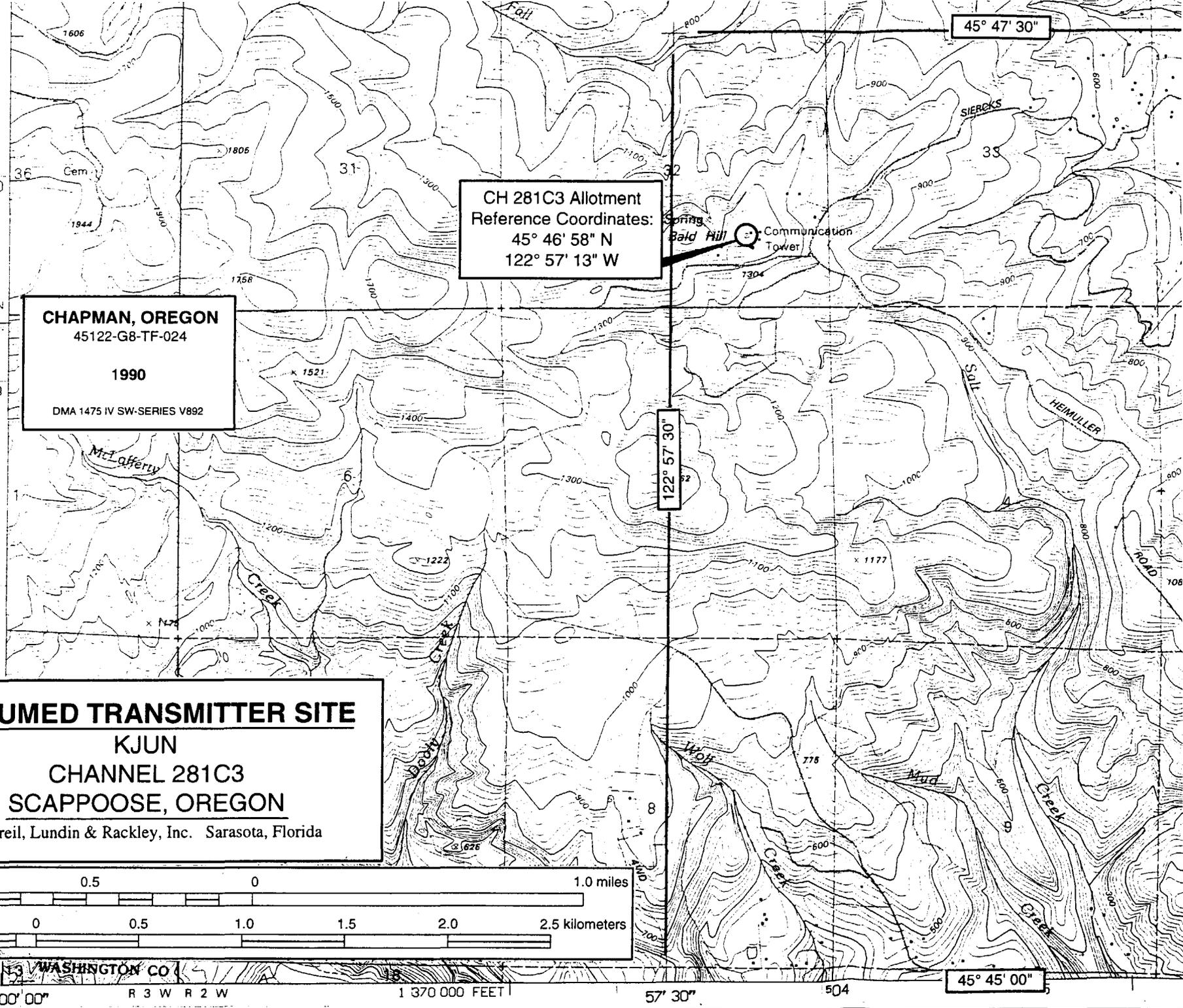
5068

122° 57' 30"

ASSUMED TRANSMITTER SITE
 KJUN
 CHANNEL 281C3
 SCAPPOOSE, OREGON
 du Treil, Lundin & Rackley, Inc. Sarasota, Florida



45° 45' 00" 123° 00' 00" R 3 W R 2 W 1 370 000 FEET 57' 30" 504 45° 45' 00"





JANUARY 1999

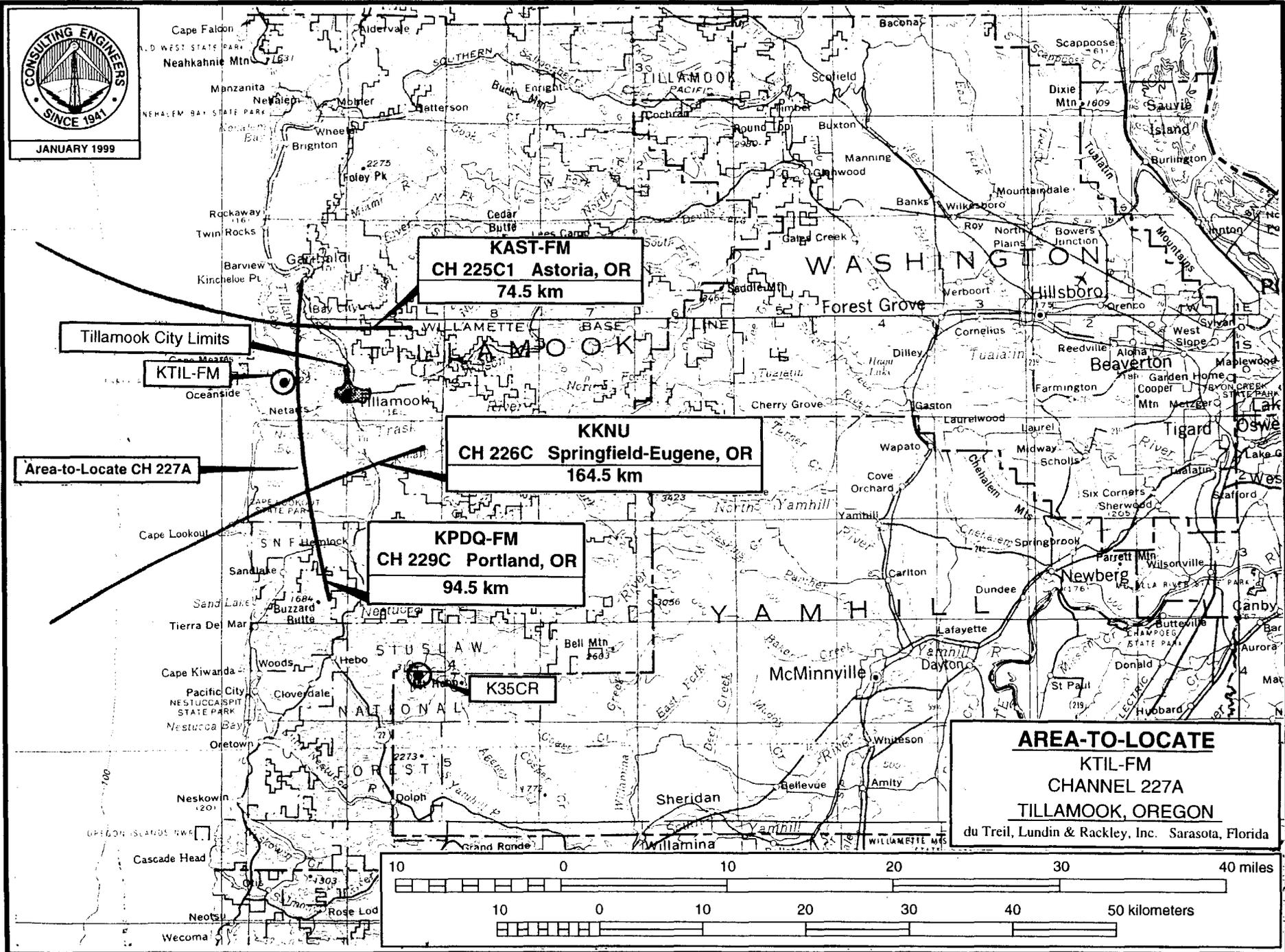
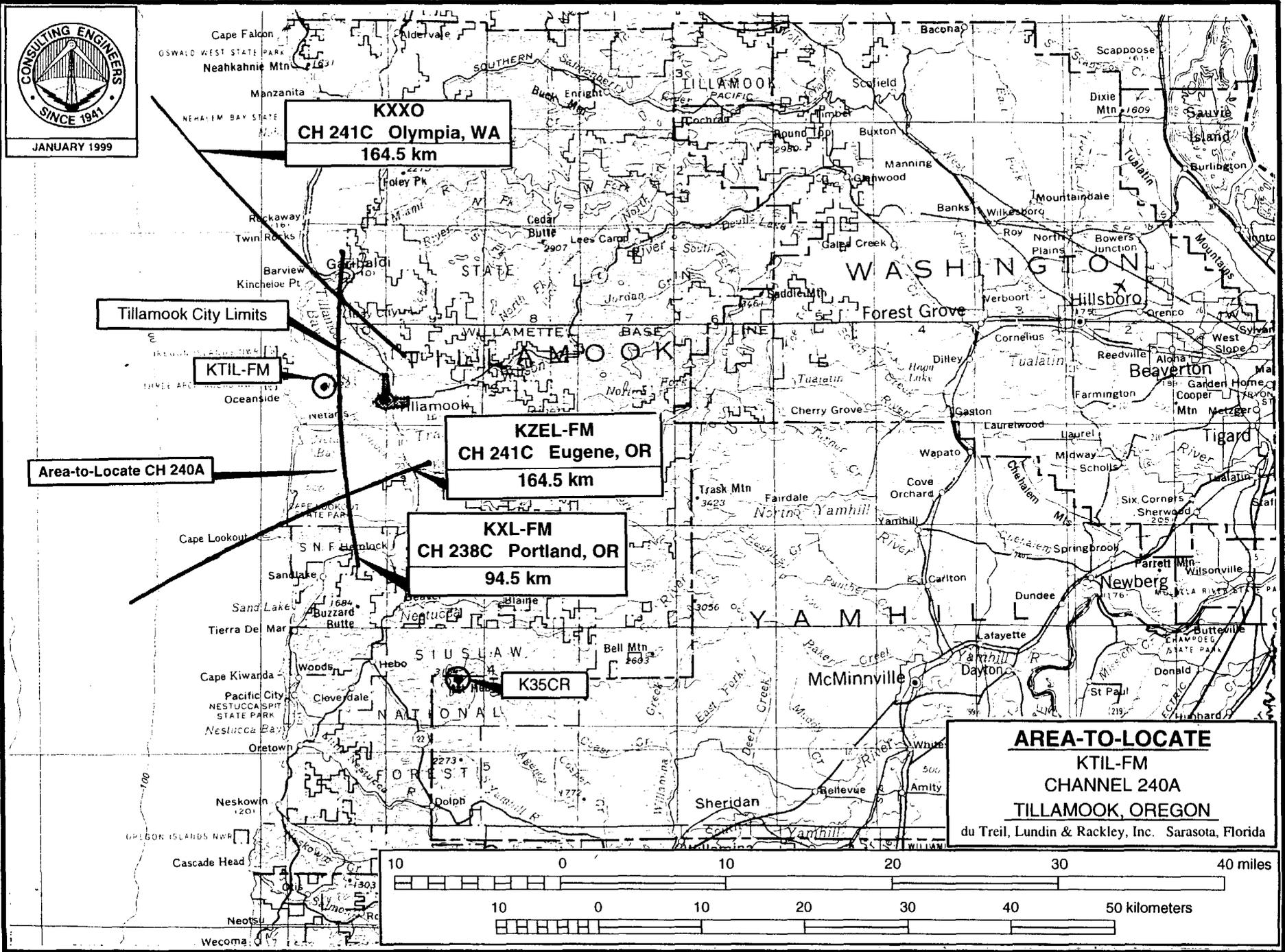


Figure 2A



JANUARY 1999



AREA-TO-LOCATE
KTIL-FM
CHANNEL 240A
TILLAMOOK, OREGON
 du Treil, Lundin & Rackley, Inc. Sarasota, Florida

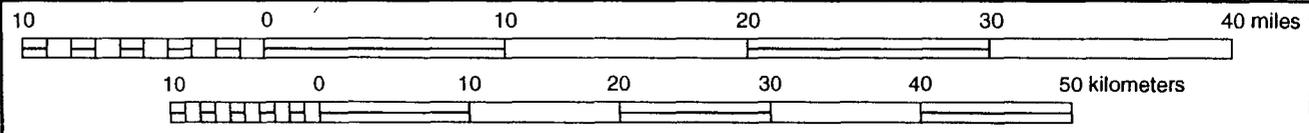


Figure 2B

FM SEPARATION STUDY

Job Title :Proposed Scappoose, OR Allot. Ref. Pt. Separation Buffer 50 km
FCC DB Date : 01/08/99
Channel 281C3 (104.1 MHz) Coordinates : 45-46-58 122-57-13

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KXPCFM LIC	Lebanon OR	BLH940411KA	279C 103.7	100. 335.0	44-30-20 122-57-38	180.2	141.95	96 CLEAR
K280BN LIC	Longview, etc. WA	BLFT830718NE	280D 103.9	.010 255.0	46-10-10 123-01-01	353.5	43.27	0 TRANS
TRANSLATOR FOR KPDQ, PORTLAND, OR.								
K280DF LIC	Astoria OR	BLFT880909TB	280D 103.9	.110 DA 251.0	46-15-46 123-53-19	306.8	89.95	0 TRANS
TRANSLATOR FOR KPDQFM, PORTLAND, OR.								
KBKH CP	Ilwaco WA	BPH920521MI	280C3 103.9	25. 100.0	46-20-53 124-00-14	308.2	102.73	99 CLOSE
K281AK LIC	Hazel Dell WA	BLFT980813TH	281D 104.1	.038 .0	45-37-47 122-40-53	128.7	27.19	0 TRANS
Translator for KLVPFM, Cherryville, OR Amended 980227								
KRRC CP	Portland OR	BPED970307MA	281D 104.1	.008 9.0	45-28-51 122-37-51	143.1	41.96	0 CLS=D
KJUN LIC	Tillamook OR	BLH860516KB	281C3 104.1	6.5 -60.0	45-27-24 123-52-36	243.5	80.61	153 SHORT
*To change to Channel 282C1 per one-step application 970224IC								
NEW-T APP	Hood River OR	BPFT970910TE	281D 104.1	.250 87.0	45-42-14 121-31-18	94.0	111.79	0 TRANS
Translator for KMCQ, The Dalles, OR.								
K281AD LIC	Olympia WA	BLFT931228TD	281D 104.1	.050 94.0	47-03-10 122-50-45	3.3	141.42	0 TRANS
Translator for KMTTFM, Tacoma, WA								
KXDD LIC	Yakima WA	BLH1929	281C1 104.1	61. 238.0	46-30-48 120-24-05	66.6	213.25	211 CLOSE

¹ KJUN's one step upgrade application (BPH-970224IC) was denied by the FCC in the Report and Order in MM Docket No. 97-7 (released October 16, 1998). The FCC appears to have forgotten to delete the comment on the KJUN license record and delete the proposed channel 282C1 FM allotment record from its FM database.

FM SEPARATION STUDY

Job Title :Proposed Scappoose, OR Allot. Ref. Pt. Separation Buffer 50 km
 FCC DB Date : 01/08/99
 Channel 281C3 (104.1 MHz) Coordinates : 45-46-58 122-57-13

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
Sisters			281C1		44-04-40	145.5	228.71	211
ALC	OR	Docket92-3	104.1	.0	121-19-52			CLEAR
Site restricted-Effective 11-20-92-RSVD For KPXA Per D92-3-Petition for reconsideration in D92-3 filed 921113								
KPXA	Sisters		281C1		44-04-40	145.5	228.71	211
PADD	OR	RM7958	104.1	.0	121-19-52			CLEAR
Petition For Reconsideration in D92-3 filed 921113								
K282AF	Woodland		282D	.050	45-54-25	53.7	23.40	0
CP	WA	BPFT970613TG	104.3	237.0	122-42-38			TRANS
Translator for KZOE, Longview, WA- Vertical Polarization Only-Amended 970820								
NEW-T	Beaverton		282D	.099	45-26-38	159.6	40.20	0
APP	OR	BPFT971010TG	104.3	25.0	122-46-26			TRANS
Translator for KLVP, Cherryville, OR								
	Tillamook		282C1		45-27-59	245.3	83.16	144 ¹
ALC	OR		104.3	.0	123-55-11		-60.84	SHORT
Proposed as Class C1 to Canada 980825 Reserved for KJUN per one-step application 970224IC								
K282AB	Chehalis		282D	0.04	46-36-43	.0	92.18	0
LIC	WA	BLFT940321TA	104.3	86.0	122-57-15			TRANS
Translator for KCMS, Edmonds, WA-								
KMCQ	The Dalles		283C	100.	45-42-41	92.5	143.03	96
LIC	OR	BLH850916KS	104.5	610.0	121-07-07			CLEAR
Grandfathered at 100 kW ERP and 610 meters HAAT								
KDUXFM	Aberdeen		284C2	31.0	46-56-00	335.3	141.18	56
LIC	WA	BLH7777	104.7	110.0	123-43-49			CLEAR

** End of separation study for channel 281C3 **



JANUARY 1999

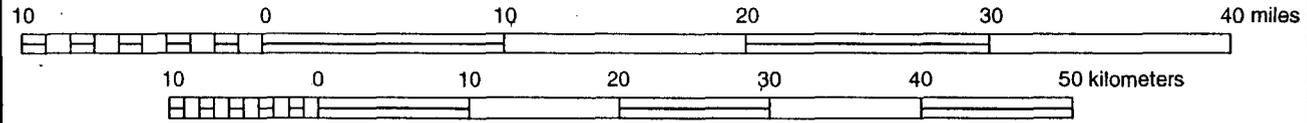
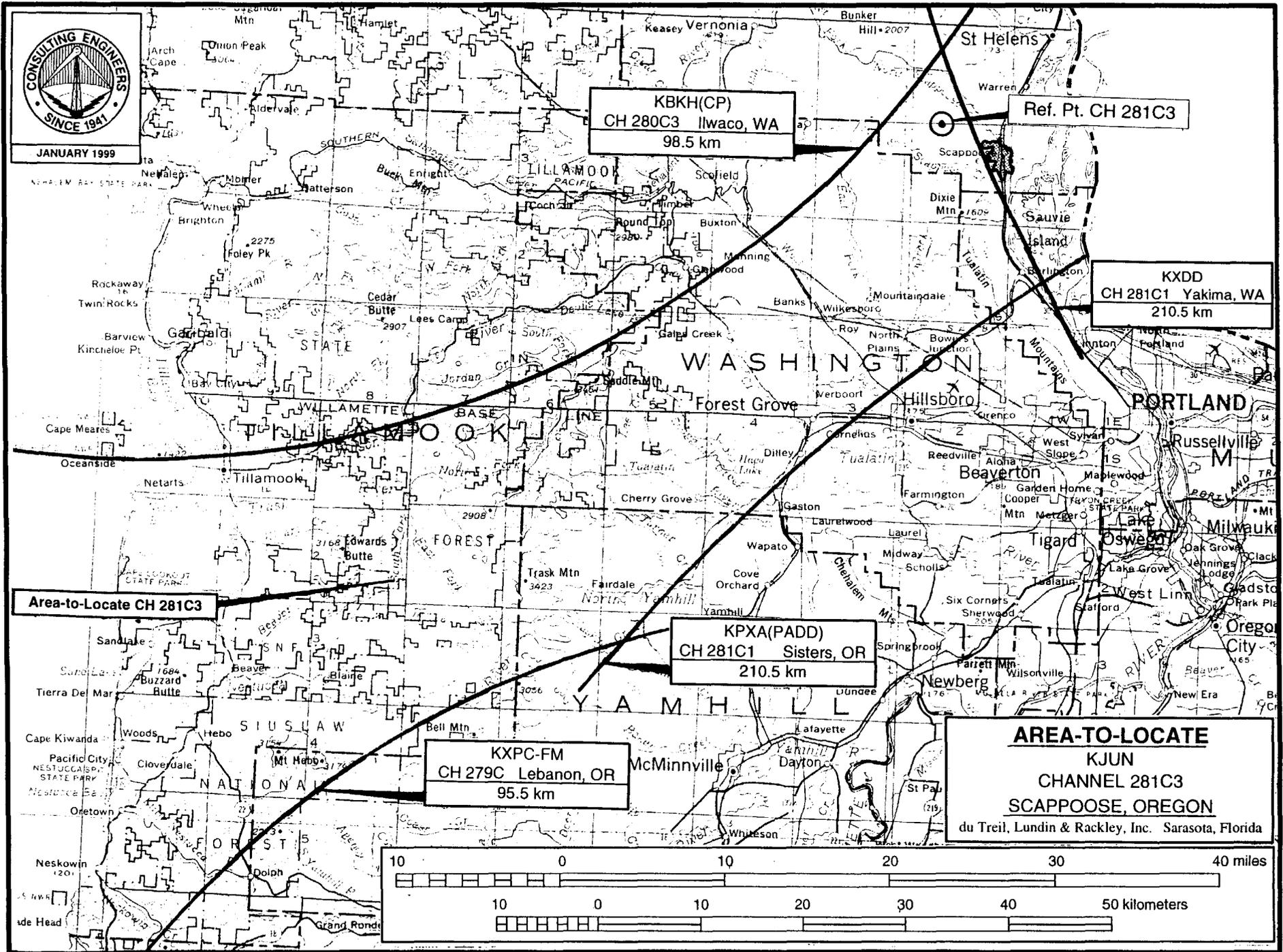


Figure 4

Figure 5

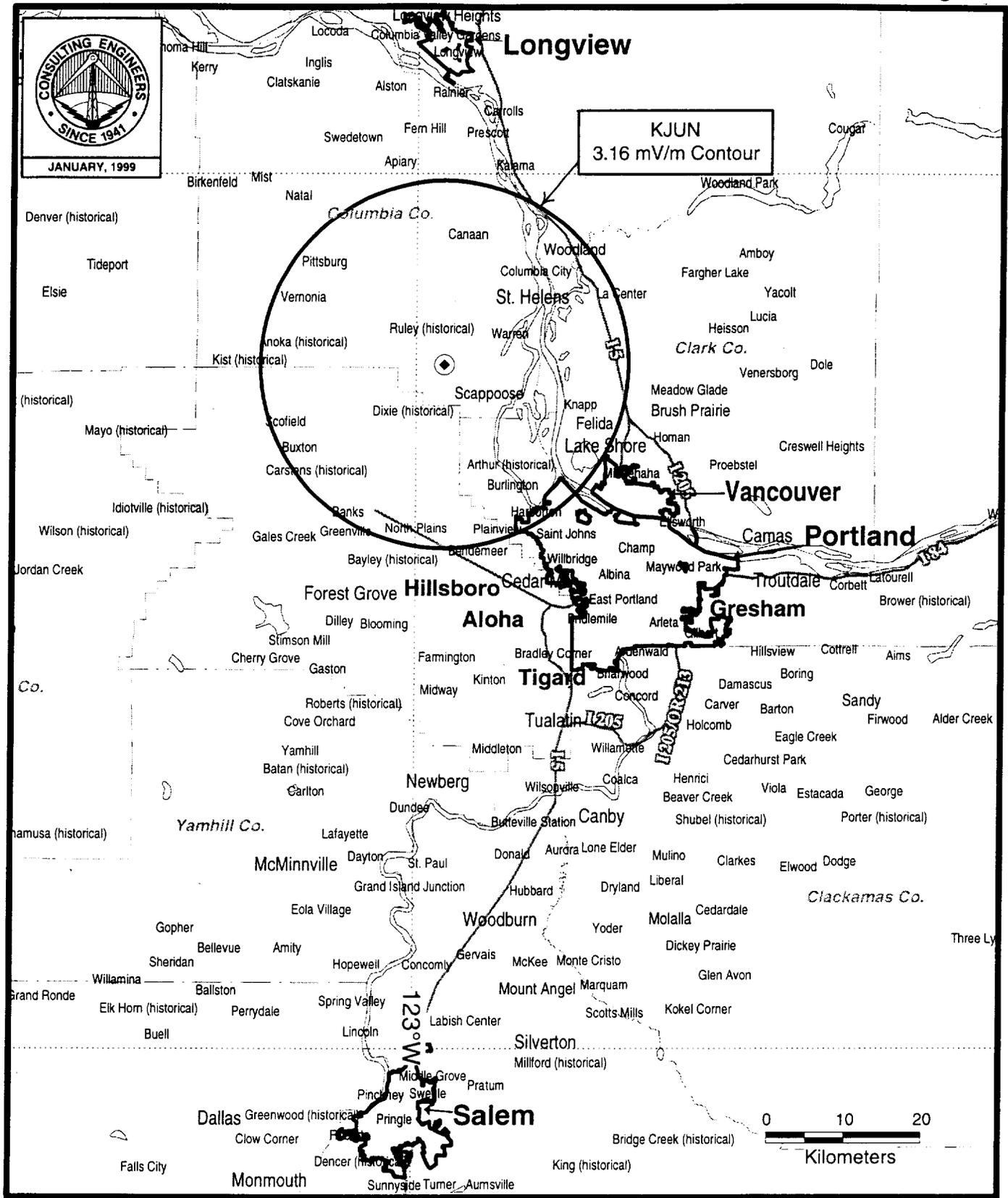


Figure 6

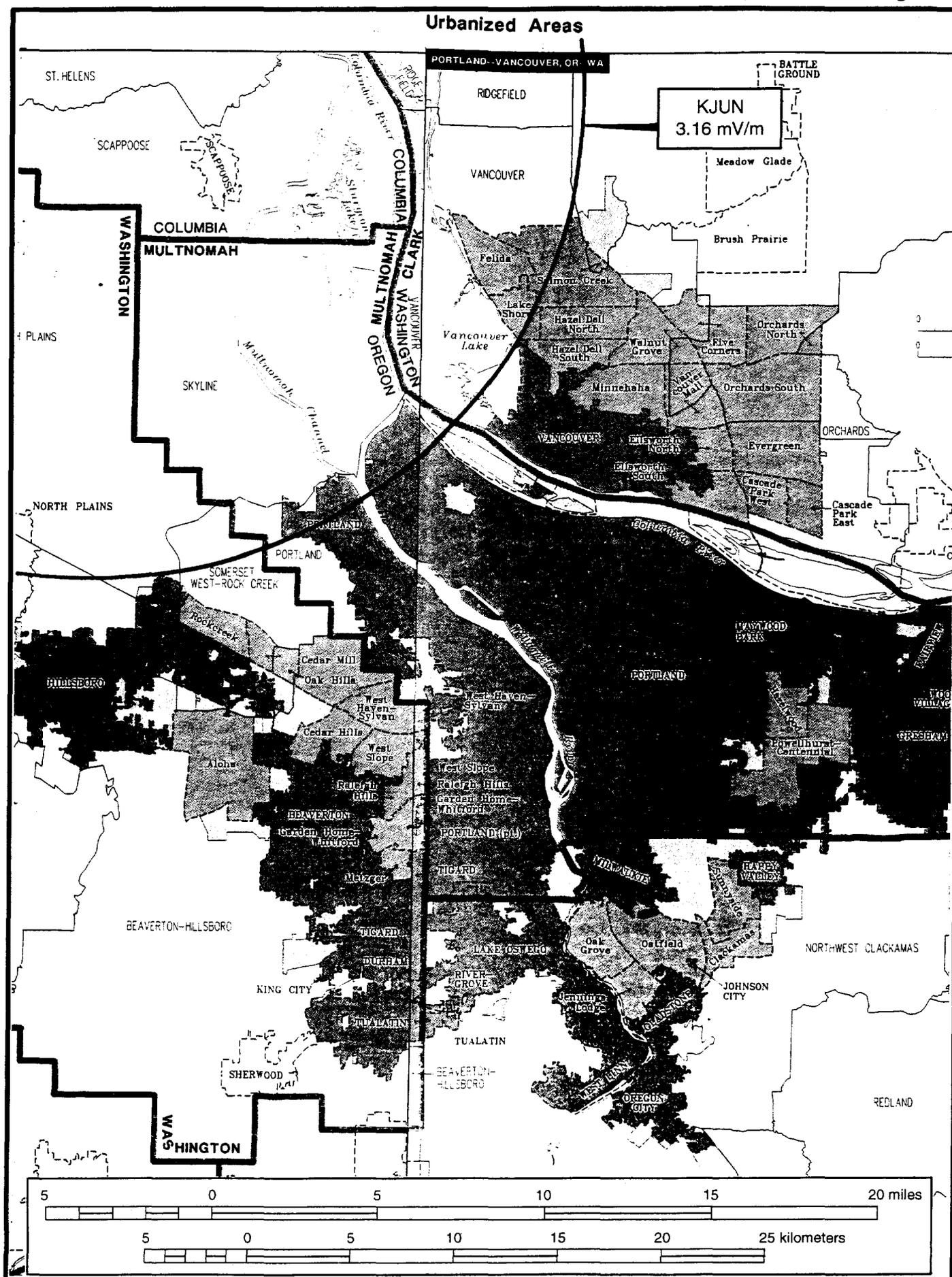
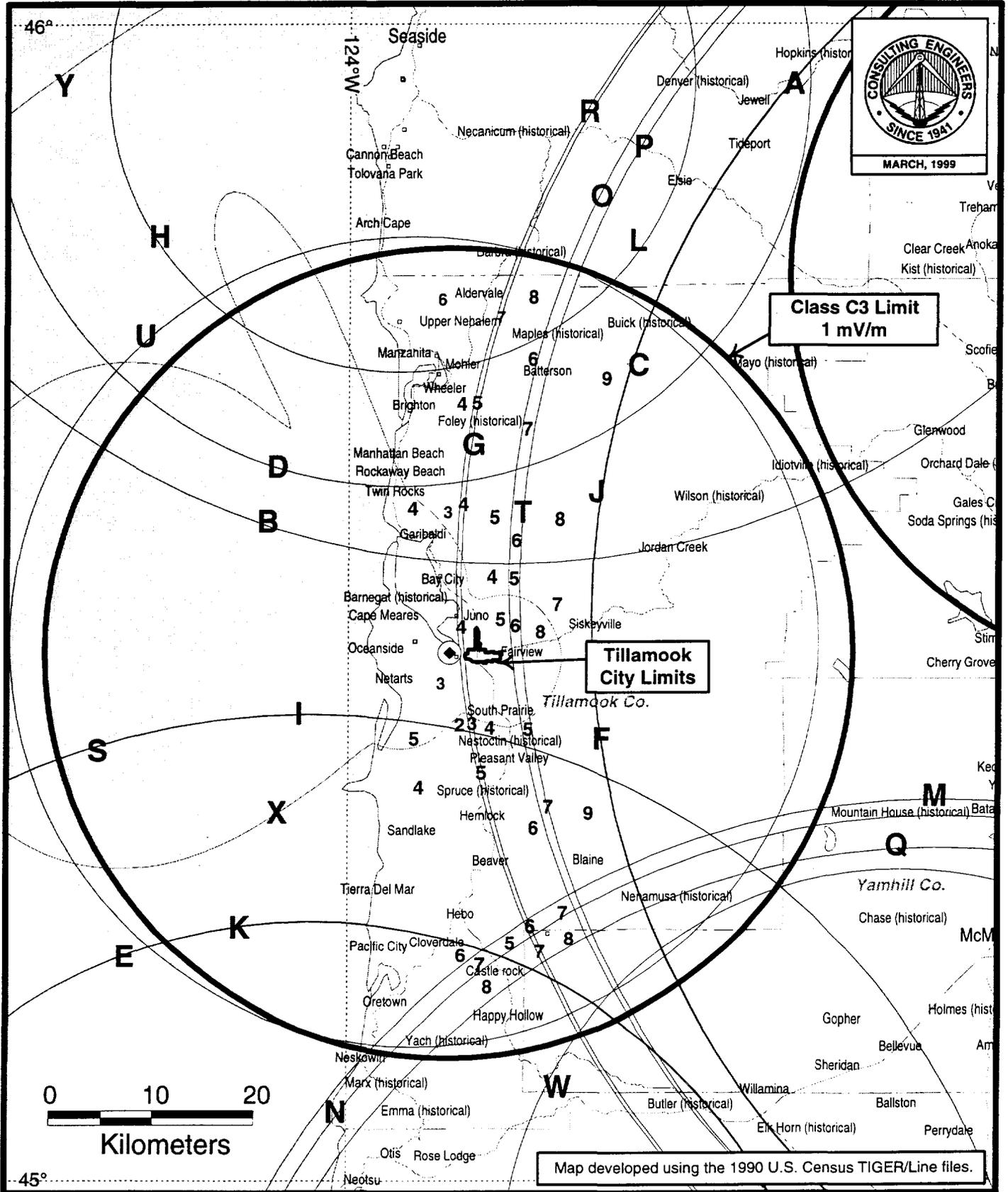


Figure 7A



Map developed using the 1990 U.S. Census TIGER/Line files.

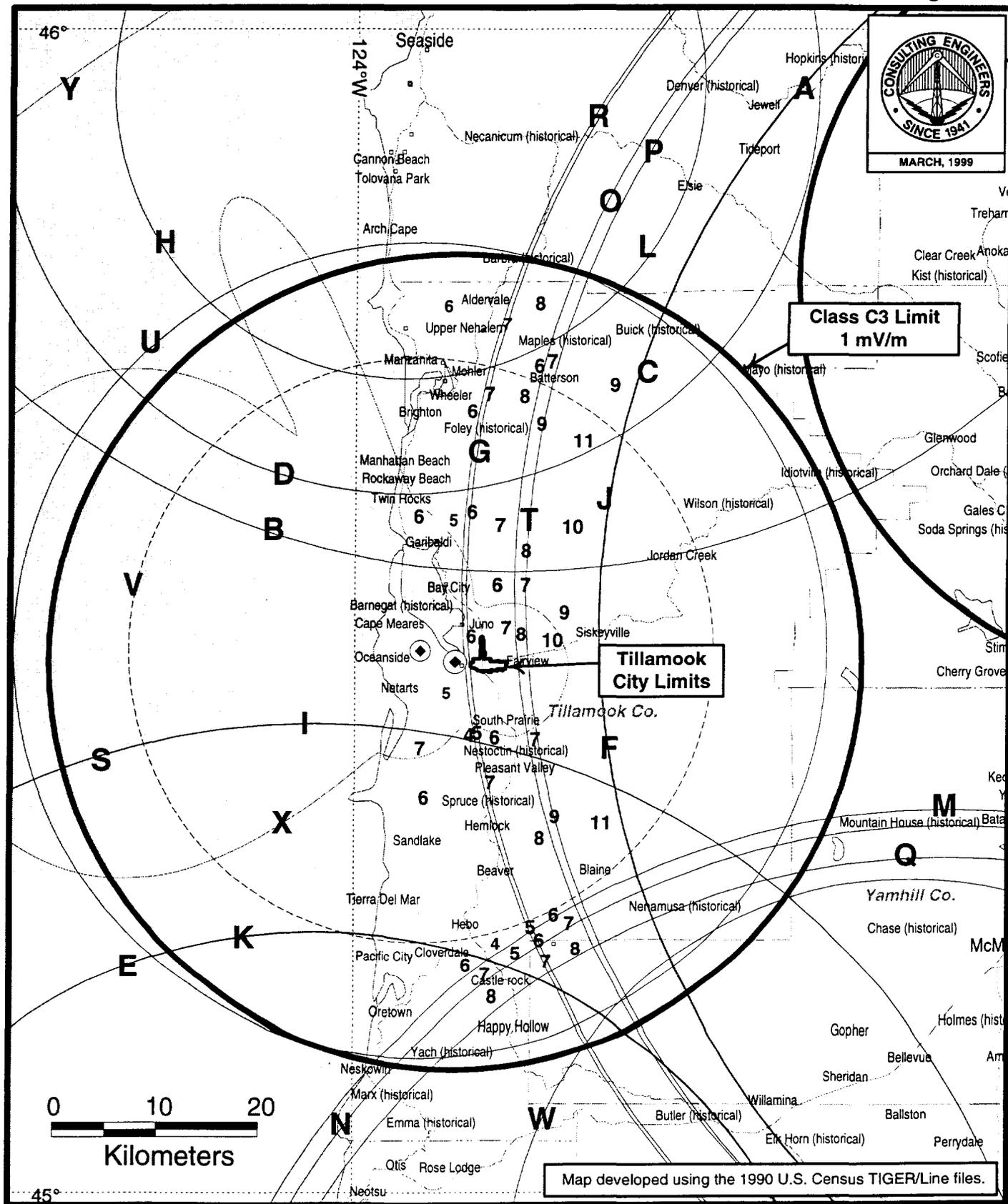
List of Other FM Stations - Tillamook

	<u>CALL</u> <u>LETTERS</u>	<u>CITY</u>	<u>STATE</u>	<u>CHANNEL</u>	<u>ERP</u>	<u>HAAT</u>
A	KGON	Portland	OR	222C	100	386
B	KAST-FM	Astoria	OR	225C1	51	178
C	KPDQ-FM	Portland	OR	229C	100	387
D	KULU	Seaside	OR	272C3	25	100
E	KSND	Lincoln City	OR	236C2	6	258
F	KXL-FM	Portland	OR	238C	100	386
G	KKCW	Beaverton	OR	277C	100	504
H	KCBZ(CP)	Cannon Beach	OR	243A	.95	92
I	KCRF(CP)	Lincoln City	OR	244C1	20	266
J	KKSN-FM	Portland	OR	246C	100	386
K	KHSL	Gleneden Beach	OR	248C2	17	257
L	KCYS(CP)	Seaside	OR	251A	6	100
M	KLOO-FM	Corvallis	OR	291C	100	347
N	KRKT-FM	Albany	OR	260C	100	326
O	KKRZ	Portland	OR	262C	100	437
P	KUFO	Portland	OR	266C	100	440
Q	KFLY(CP)	Corvallis	OR	268C1	74	335
R	KINK-FM	Portland	OR	270C	100	510
S	KYTE	Newport	OR	274C1	66	269
T	KKJZ	Lake Oswego	OR	294C	100	440
U	KJUN(CPM)	Tillamook	OR	231C3	1.8	357
V	ALC	Dallas	OR	252C3	25	100

List of Other AM Stations - Tillamook

	<u>CALL</u> <u>LETTERS</u>	<u>CITY</u>	<u>STATE</u>	<u>FREQUENCY</u>	<u>kW</u>
X	KMBD	Tillamook	OR	1590	1.0
Y	KEX	Portland	OR	1190	50.0

Figure 7C



List of Other FM Stations - Scappoose

	<u>CALL</u> <u>LETTERS</u>	<u>CITY</u>	<u>STATE</u>	<u>CHANNEL</u>	<u>ERP</u>	<u>HAAT</u>
A	KGON	Portland	OR	222C	100	386
B	KPDQ-FM	Portland	OR	229C	100	387
C	KXL-FM	Portland	OR	238C	100	386
D	KKSN-FM	Portland	OR	246C	100	386
E	KKJZ	Lake Oswego	OR	294C	100	440