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Us Post Office

601-426-6773

221 Main St

Sandersville, MS

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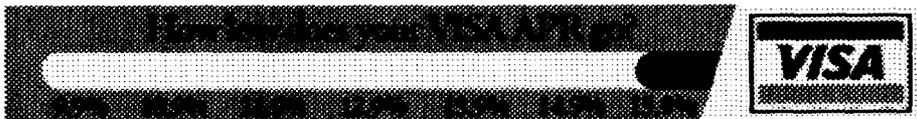
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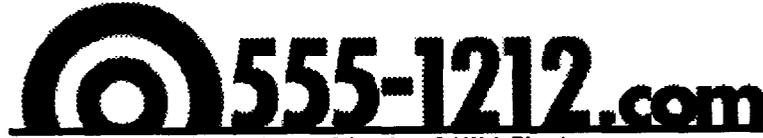
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110 E Main St
Sandersville, MS

601-649-3068

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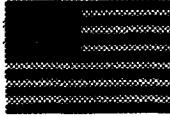
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601-428-0992

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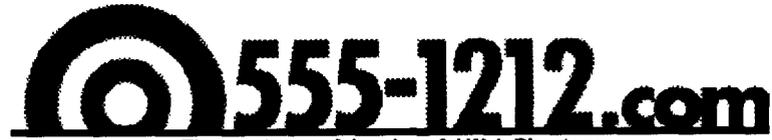
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 110 E Main St
 Sandersville, MS

601-428-0992

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Sandersville Elementary School
 Highway 11 N
 Sandersville, MS

[601-426-3978](#)

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Sandersville, MS
Mount Pleasant Baptist Church
Highway 11
Sandersville, MS
Sandersville Baptist Church
Highway 11 N
Sandersville, MS
United Presbyterian Church
202 Sanders St
Sandersville, MS

601-425-1251

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About...

Map/Directions - Details

601-428-0540

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Community Bank
 203 Front St
 Sandersville, MS

601-649-3032

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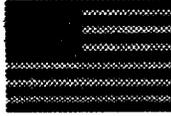
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Family Health Center
203 Broad St
Sandersville, MS

601-426-9918

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Bob's Grocery & Market
205 N Front St
Sandersville, MS

601-425-1621

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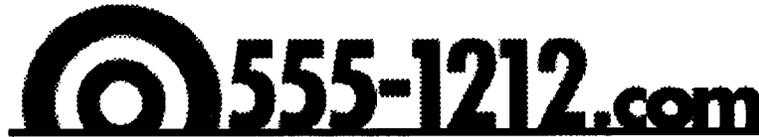
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Bogue Homa Trade Mart
 907 Florence Church Rd
 Sandersville, MS
 Sandersville Exxon
 305 N Front St
 Sandersville, MS

601-426-6913

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Clint's Cut & Style
107 Front St
Sandersville, MS

601-426-3489

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Sam's Restaurant
Highway 11 N
Sandersville, MS
Subway Sandwiches & Salads
101 S Front St
Sandersville, MS

601-425-5516

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601-425-3697

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EXHIBIT 9

TECHNICAL EXHIBIT
IN SUPPORT OF
COMMENTS AND ALTERNATIVE COUNTERPROPOSAL
IN THE NOTICE OF PROPOSED RULE MAKING IN
MM DOCKET NO. 99-74
AMENDMENT OF THE FM TABLE OF ALLOTMENTS
BAY SPRINGS AND SANDERSVILLE, MISSISSIPPI

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of FM station WKZW (herein "Petitioner") in support of a Comments and Alternative Counterproposal ("Alternative Counterproposal") in response to the Commission's Notice of Proposed Rule Making ("NPRM") in MM Docket No. 99-74 (DA 99-498, RM-9367, released March 12, 1999). In the NPRM, the Commission proposed to amend Section 73.202(b) to reallocate channel 232C2 from Bay Springs, Mississippi to Ellisville, Mississippi and modify the license of WKZW to reflect the new community of license. The Petitioner's Alternative Counterproposal proposes to reallocate channel 232C2 from Bay Springs, Mississippi to Sandersville, Mississippi and modify the license of WKZW to reflect the new community of license. As the requested change to channel 232C2 at Sandersville is mutually exclusive with the present allotment of channel 232C2 at Bay Springs, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the reallocation proposal:

- The community of Sandersville, Mississippi (1990 population 853) will be provided with its first local aural transmission service.
- Bay Springs, Mississippi (1990 population 1,729) will not be deprived of its sole "existing" local service as there is one AM assignment at Bay Springs, namely, WIZK on 1570 kHz (BL-980504KB).
- Sandersville is not located within any Urbanized Area as defined by the 1990 U.S. Census.

- The 70 dBu contour for the Alternative Counterproposal will not encompass any portion of an Urbanized Area.
- The number of persons within WKZW's currently operating 1 mV/m contour will increase from 180,721 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 35,798 persons (BLH-980427KE).
- The number of persons within WKZW's 1 mV/m contour authorized in construction permit BPH-980217ID will increase from 214,180 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 2,339 persons.

Proposed Change in Table of Allotments

Station WKZW is currently licensed (BLH-980427KE) to operate on channel 232C2 at Bay Springs, Mississippi with an effective radiated power (ERP) of 50 kW and an antenna height above average terrain (HAAT) of 125 meters. In addition, WKZW has a construction permit, BPH-980217ID, which authorizes operation on channel 232C2 with an ERP of 50 kW and an HAAT of 197 meters.

Bay Springs is located in Jasper County and has a 1990 U.S. Census population of 1,729 persons. AM station WIZK on 1570 kHz is licensed to serve Bay Springs (BL-980504KB). Therefore, adoption of the proposal will not deprive Bay Springs of its sole "existing" local service.

Sandersville, Mississippi is located in Jones County and has a 1990 U.S. Census population of 853 persons. Sandersville has no local aural services, therefore, Petitioner's Alternative Counterproposal would

bring a first local aural broadcast service to Sandersville. The proposed changes are as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Bay Springs, Mississippi	232C2	--
Sandersville, Mississippi	--	232C2

Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to use of channel 232C2 at Sandersville. The reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments. Operation from the reference site will provide the requisite city grade signal to all of Sandersville.

Figure 2 is a map showing the area to locate channel 232C2 at Sandersville in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class C2 facilities (ERP 50 kW/HAAT 150 m).

Pursuant to Section 1.420(i), the Commission will consider petitions to modify the license/construction permit of an FM station to specify a new community if the proposed allotment would be mutually exclusive with the present assignment. As the entire area to locate for channel 232C2 at Sandersville depicted on Figure 2 would be short-spaced to the both the licensed and authorized operations of WKZW channel 232C2 operation, the proposed allotment is mutually exclusive with the existing allotment.

Urbanized Area Considerations

Sandersville, Mississippi is not located within any Urbanized Area as defined by the 1990 U.S. Census. Furthermore, the closest point of Sandersville is located 22 km from the closest point of the nearest Urbanized Area (Hattiesburg). Also, the proposed 70 dBu contour will not encompass any portion of an Urbanized Area.

Gain and Loss Areas and Available Aural Services

Figure 3, attached, is a map showing the FM 1 mV/m primary service contours for the licensed WKZW operation on channel 232C2 at Bay Springs (BLH-980427KE) and the Alternative Counterproposal and, separately, the authorized WKZW operation on channel 232C2 at Bay Springs (BPH-980217ID) and the Alternative Counterproposal. Maximum facilities and uniform terrain were used to determine the contour locations. The 1 mV/m "gain" and "loss" areas are also indicated.

Figure 4 is the same map as Figure 3 with an analysis of AM and FM reception services available to the gain and loss areas added.¹ For FM stations the 1 mV/m contour is depicted, and for Class A AM station WWL the 0.5 mV/m contour is shown. For other AM stations, the nighttime-interference-free (NIF) is depicted. Figure 5 tabulates the AM and FM stations whose contours are shown on Figure 4. Only those FM and AM services necessary to provide at least five (5) fulltime aural services to the gain and loss areas have been shown on Figure 4. The letters identify the AM and FM service contours of stations tabulated on Figure 5. It has been determined

¹The determination of available reception services was based on the criteria set forth in footnote 1 of the Notice of Proposed Rule Making in MM Docket No. 96-219 (DA 96-1774; adopted October 25, 1996, released November 1, 1996).

that there are at least five fulltime aural services available to both the gain and loss areas.

Population and Area within Gain and Loss Areas

Adoption of the Petitioner's Alternative Counterproposal will increase the number of persons within WKZW's presently operating (BLH-980427KE) 1 mV/m contour from 180,721 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 35,798 persons.

In addition, adoption of the Petitioner's Alternative Counterproposal will increase the number of persons within WKZW's currently authorized 1 mV/m contour from 214,180 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 2,339 persons.

FM 1 mV/m Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of Section 73.313, except that uniform terrain was presumed in all directions. Distances to AM contours were based on either nondirectional radiation pattern values or standard radiation pattern values obtained from the FCC's AM database. FCC Figure M-3 conductivity employed along all azimuths.

Population and Area

The population within each FM primary service contour (1 mV/m) and each gain and loss area was calculated using a computer program that utilizes the 1990 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service

area. The area within each FM primary service contour was calculated using a root mean square algorithm.

Conclusion

Channel 232C2 can be reallocated from Bay Springs, Mississippi to Sandersville, Mississippi in compliance with all applicable Commission Rules. The proposal will result in a first local broadcast service to Sandersville. The proposal would not deprive Bay Springs of local aural broadcast service. The number of persons within WKZW's authorized (CP) 1 mV/m contour will increase from 214,180 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 2,339 persons. The number of persons within WKZW's currently operating 1 mV/m contour will increase from 180,721 persons to 216,519 persons, and there will be a "net" increase in 1 mV/m coverage to 35,798 persons. Therefore, Petitioner's requests the reallocation of channel 232C2 from Bay Springs to Sandersville, Mississippi and the modification of the Petitioner's construction permit to specify operation on channel 232C2 at Sandersville.

W. Jeffrey Reynolds

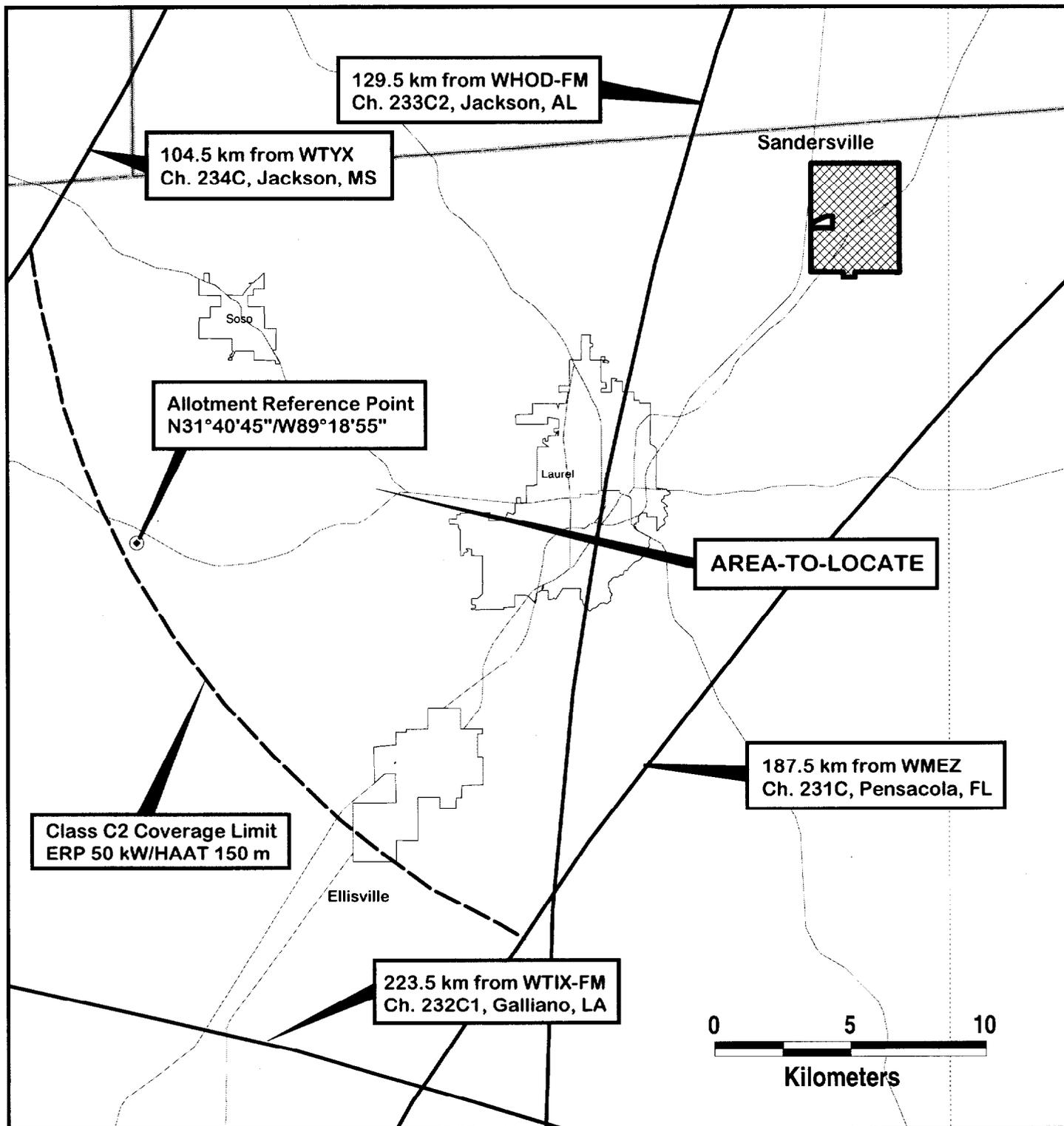
W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue

Sarasota, Florida 34237-6019

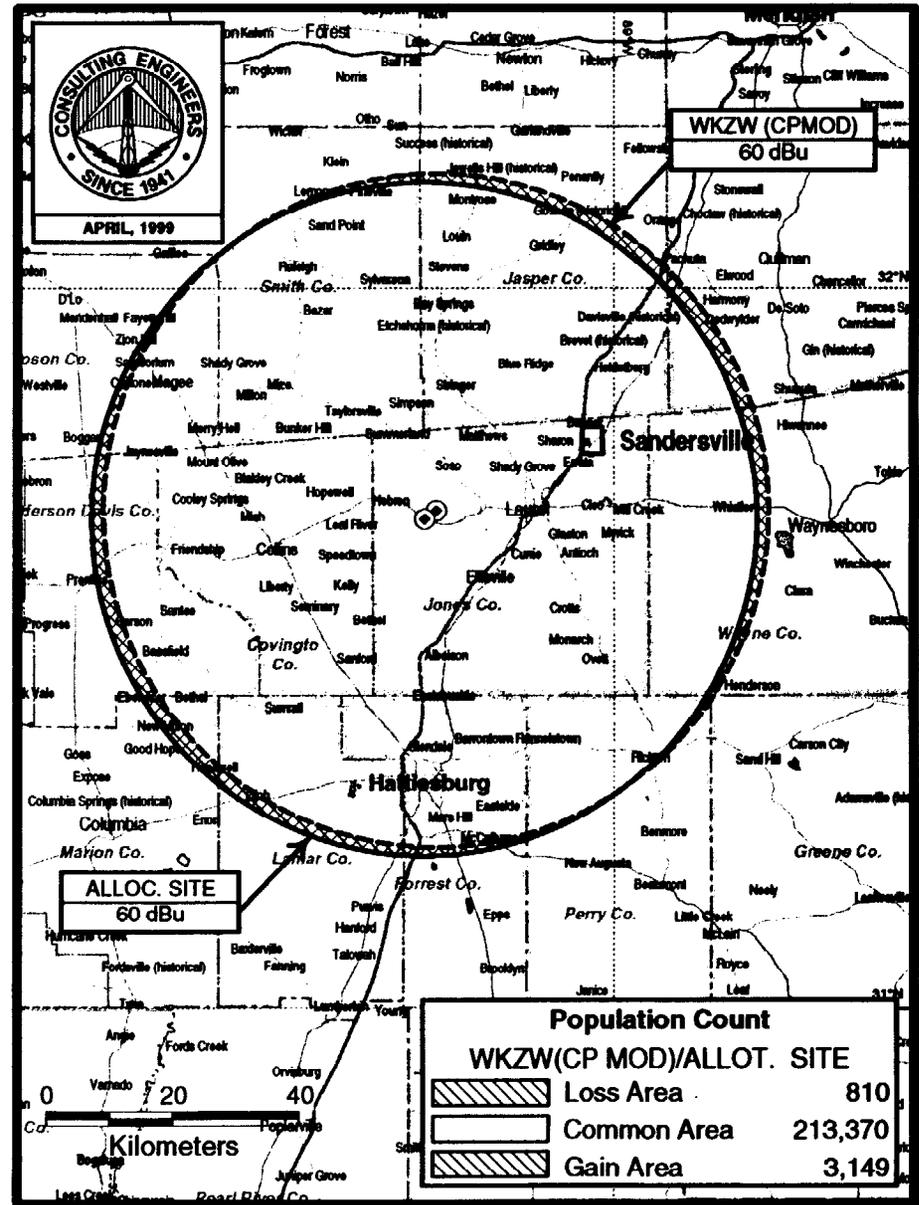
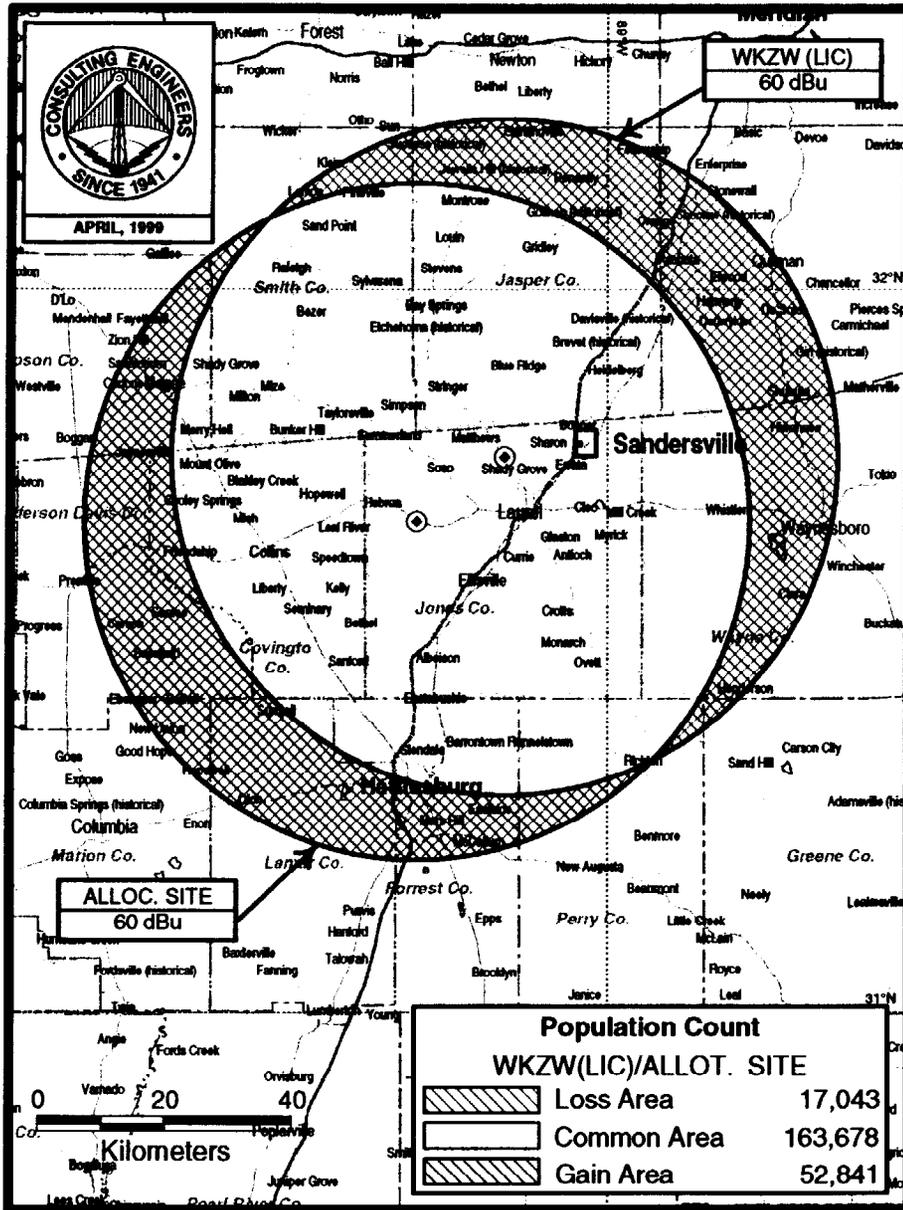
April 30, 1999

Figure 2

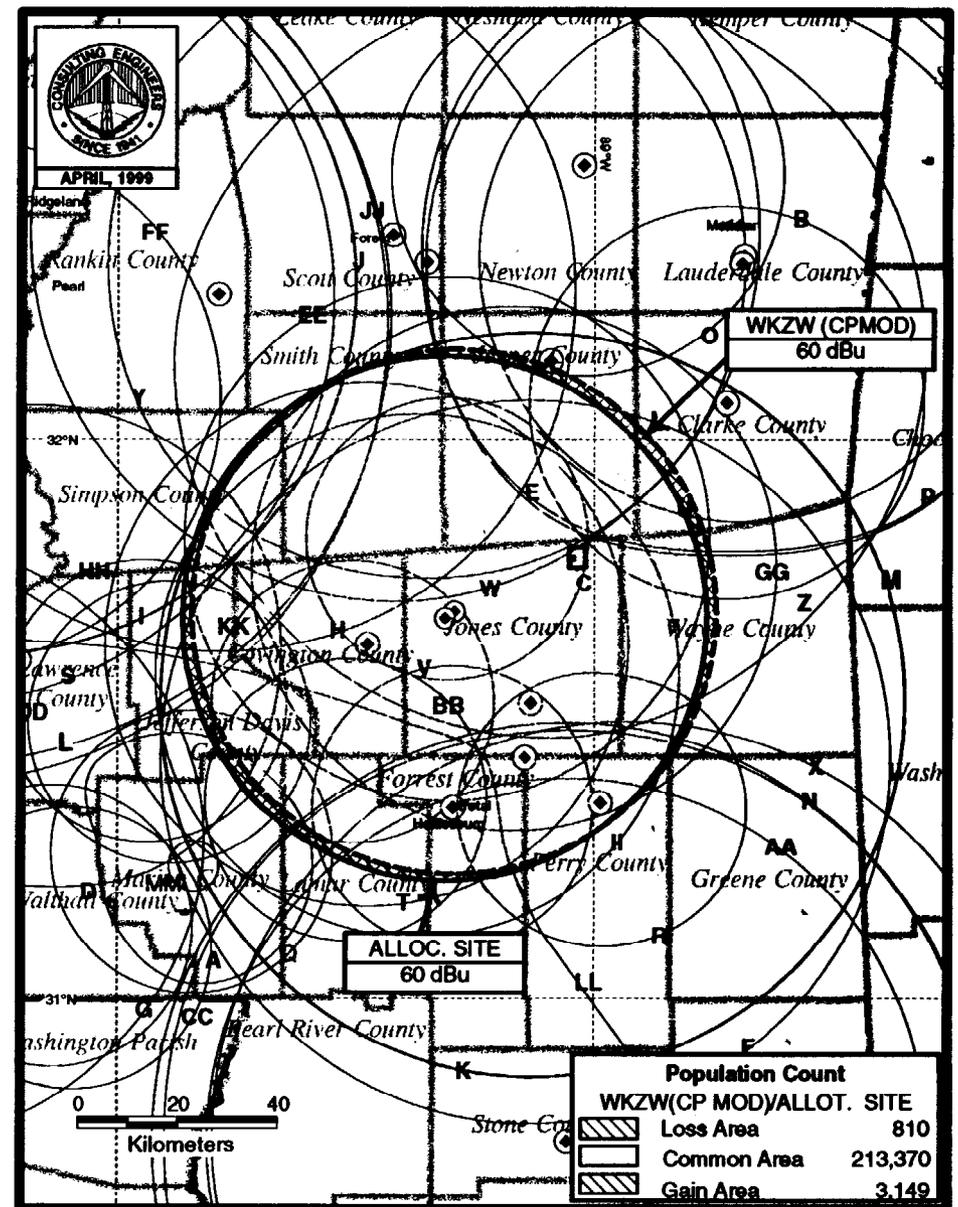
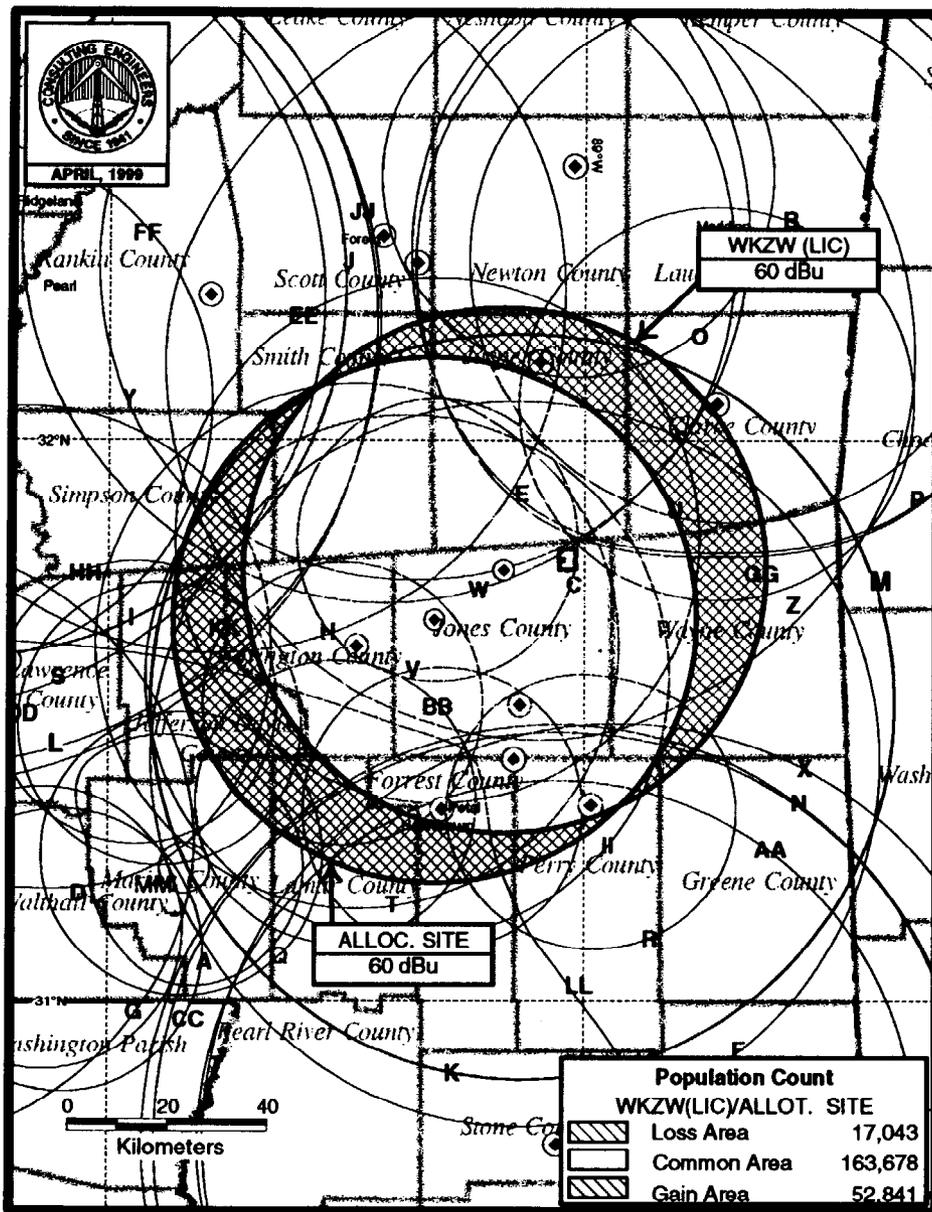


**AREA TO LOCATE
CHANNEL 232C2
SANDERSVILLE, MISSISSIPPI**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



GAIN/LOSS AREAS
WKZW
SANDERSVILLE, MISSISSIPPI
du Treil, Lundin & Rackley, Inc., Sarasota, Florida



OTHER SERVICES
WKZW
SANDERSVILLE, MISSISSIPPI
 du Treil, Lundin & Rackley, Inc., Sarasota, Florida

Tabulation of Other Aural (AM/FM) Services

FM STATIONS				
Letter	Call Sign	City of License	State	Channel
A	Allotment	Tylertown	MS	297A
B	WYKKFM	Quitman	MS	255C3
C	WEZZ	Clanton	AL	249A
D	WRQO	Monticello	MS	271C2
E	WJDQ	Meridian	MS	267C1
F	WXRR	Hattiesburg	MS	283C1
G	WAKH	McComb	MS	289C1
H	WKXIFM	Magee	MS	298C1
I	WKTF	Jackson	MS	238C
J	WJMI	Jackson	MS	259C
K	WNSL	Laurel	MS	262C
L	WMSI	Jackson	MS	275C
M	WHER	Hattiesburg	MS	279C
N	WZKX	Union	MS	281C2
O	WMYQFM	Newton	MS	250C3
P	WOKK	Meridian	MS	246C1
Q	WFFFFM	Columbia	MS	244A
R	WXHB	Richton	MS	243A
S	WJDX	Jackson	MS	242C
T	WBBN	Tylorsville	MS	240C2
U	WYYW	Marion	MS	236C2
V	WJMG	Hattiesburg	MS	221A
W	WQSTFM	Forest	MS	223C
X	WMAHFM	Biloxi	MS	212C
Y	WMBU	Forest	MS	206C1
Z	WMAWFM	Meridian	MS	201C
AA	WLNF (CPMOD)	Lumberton	MS	237C1
BB	WJSJ	Sumrall	MS	247A
CC	WTYLFM	Tylertown	MS	249A
DD	WJDR	Prentis	MS	252A
EE	WEEZ	Heidelberg	MS	257C2
FF	Allotment	Utica	MS	265C2
GG	WJKX	Ellisville	MS	273C2
HH	WBFL (CP)	Prentis	MS	285A
II	WMFM (CP)	Petal	MS	292C2
JJ	WSTZFM	Vicksburg	MS	294C
KK	WKNZ	Collins	MS	296A

AM STATIONS					FREQUENCY	FACILITIES	NIF
ID	CALL	CITY	STATE	CLASS	(kHz)	(kW)	(mV/m)
LL	WWL	New Orleans	LA	LIC	870	50	2798.65
MM	WCJU	Columbia	MS	LIC	1450	1	304.17