

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**RECEIVED**

In the Matter of **MAY 18 1999** )  
Amendment of Section **FEDERAL COMMUNICATIONS COMMISSION** )  
Table of Allotments **73.202(b)** )  
FM Broadcast Stations )  
(Boulder City, Nevada; Bullhead )  
City, Arizona; Lake Havasu City, )  
Arizona; Kingman, Arizona; )  
Ludlow, California) )

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

TO: John A. Karousos, Chief  
Allocations Branch, Policy and Rules Division  
Mass Media Bureau

PETITION FOR RULE MAKING

1. Centennial Broadcasting Licensee, LLC ("Centennial"), licensee of  
Station KSTJ(FM), Boulder City, Nevada, hereby petitions for an amendment of the FM Table of  
Allotments, 47 C.F.R. §73.202(b), as follows:

	<u>Present</u>	<u>Proposed</u>
Boulder City, NV	<b>288C2 --&gt; 286C2</b>	<b>274C</b>
** Bullhead City, AZ	<b>274C</b>	<b>289C</b>
Lake Havasu City, AZ	<b>224C2</b> 244C2, 266C1 283C2 --> 286C2	<b>272C2</b> 244C2, 266C1 283C2
Kingman, AZ	<b>290C1</b> 234C 260C2 --> 261C2	<b>224C1</b> 234C 260C2 --> 261C2
** Ludlow, CA	<b>289A</b>	<b>273A</b>

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The changes proposed herein are shown in boldface. The proposed changes noted by double asterisks (\*\*) would require orders to show cause. The changes indicated by an arrow (->) reflect changes which have been proposed and are presently pending in rule making proceedings or one-step upgrade applications.

2. The changes proposed herein will result in a more efficient allotment of spectrum and will permit Centennial to serve a wider area. Centennial's Station KSTJ(FM) is the only FM station licensed to Boulder City, Nevada, and an upgrade of that station's channel to a full Class C (from a Class C-2) will expand that station's service area by more than 250 percent. Such expansion is plainly in the public interest.

3. As set forth in the accompanying engineering statement, the substitution of channels in Boulder City will require four other channel substitutions:

- Channel 274C in Bullhead City, Arizona, currently licensed to Station KFLG(FM), would be replaced by Channel 289C.
- Channel 224C2 in Lake Havasu City, Arizona, currently licensed to Station KJJJ(FM), would be replaced by Channel 272C2.
- Channel 290C1 in Kingman, Arizona, currently licensed to Station KRCY(FM), would be replaced by Channel 224C1.
- Channel 289A in Ludlow, California, currently licensed to Station KDUQ(FM), would be replaced by Channel 273A.

According to Centennial's Engineering Statement submitted herewith as Exhibit A, all of the existing licensed sites of the affected stations are properly spaced on the replacement channels proposed herein. Since all of those stations would retain, under the instant proposal, the same class of service (albeit on different channels), it is clear that all would continue to provide the same level of service to their respective communities of license as they are presently providing.

4. The licensees of Stations KJJJ(FM) and KRCY(FM) have agreed to the proposals advanced herein.<sup>1/</sup> Consent has not yet been obtained from the licensees of Stations KDUQ(FM) and KFLG(FM). However, since only two of the proposed channel substitutions, at most, would be involuntary, the instant proposal is consistent with the Commission's rules and may be processed. See, e.g., Columbus, Nebraska et al., 59 R.R.2d 1184 (1986); Farmersville, Texas, 12 FCC Rcd 4099, 4102 (Allocations Branch 1997).

5. Two further points should be noted. First, the geographic area in question is within 290 kilometers of the U.S.-Mexico border. Accordingly, Mexican concurrence will be required. Second, in MM Docket No. 93-279, the Commission rejected -- in 1995 -- certain allotment proposals for Cal-Nev-Ari, Arizona, Boulder City, Nevada, and Las Vegas. An application for review of the rejection of one of those proposals (i.e., the proposed allotment of Channel 285A to Cal-Nev-Ari) was filed and is still pending. To the best of Centennial's knowledge, no review of the rejection of the Boulder City and/or Las Vegas proposals was sought by any party. As a result, Centennial understands that the Boulder City and Las Vegas proposals which were rejected there are no longer subject to protection.<sup>2/</sup>

6. In the event that the proposed changes are adopted, Centennial will take all steps necessary to promptly seek authority to construct, and to construct and commence operation

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<sup>1/</sup> See Exhibits B-1 and B-2. In addition, also as set forth in the Engineering Statement, the proposed changes contemplate the dismissal of an application filed by Station KZUL(FM), Lake Havasu City, Arizona, proposing a modification from Channel 283C2 to Channel 286C2. The licensee of Station KZUL(FM) has agreed to dismiss that application. See Exhibit B-3.

<sup>2/</sup> In any event, the proponent of the Boulder City channel change advanced in MM Docket No. 93-279 was the licensee of Station KSTJ(FM) (then Station KRRI(FM)). To the extent that that proposal may still be deemed, arguendo, pending, Centennial, which has since become the licensee of KSTJ(FM), will request dismissal of that proposal.

with, the upgraded facilities proposed herein. Additionally, Centennial agrees to reimburse the other affected licensees for the expenses associated with the other required channel changes, either as agreed to among the parties or, if no agreement is reached, to the extent that such reimbursement of reasonable expenses may be required by Commission rule or policy.

7. Accordingly, as set forth herein and in the accompanying Engineering Statement, Centennial proposes that the FM Table of Allotments be amended as follows:

	<u>Present</u>	<u>Proposed</u>
Boulder City, NV	288C2 --> 286C2	274C
Bullhead City, AZ	274C	289C
Lake Havasu City, AZ	224C2 244C2, 266C1 283C2 --> 286C2	272C2 244C2, 266C1 283C2
Kingman, AZ	290C1 234C 260C2 --> 261C2	224C1 234C 260C2 --> 261C2
Ludlow, CA	289A	273A

Respectfully submitted,

CENTENNIAL BROADCASTING LICENSEE,  
INC.

By 

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(202) 776-2534

May 18, 1999

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**EXHIBIT A**

**ENGINEERING EXHIBIT EE:**

**CENTENNIAL BROADCASTING LICENSE LLC  
FIVE STATION FM RULE MAKING  
SUBSTITUTION OF**

**FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV  
FM CHANNEL 289C FOR 274C - BULLHEAD CITY, AZ  
FM CHANNEL 272C2 FOR 224C2 - LAKE HAVASU CITY, AZ  
FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ  
FM CHANNEL 273A FOR 289A - LUDLOW, CA**

**MARCH 31, 1999**

**ENGINEERING STATEMENT IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ALLOTMENTS**

ENGINEERING EXHIBIT EE:

CENTENNIAL BROADCASTING LICENSE LLC  
FIVE STATION FM RULE MAKING  
SUBSTITUTION OF

FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV  
FM CHANNEL 289C FOR 274C - BULLHEAD CITY, AZ  
FM CHANNEL 272C2 FOR 224C2 - LAKE HAVASU CITY, AZ  
FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ  
FM CHANNEL 273A FOR 289A - LUDLOW, CA

TABLE OF CONTENTS:

1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, Channel Allocation Study for Ch. 274C.  
from KSTJ Lic - Boulder City, NV.
4. Figure 2, Channel Allocation Study for Ch. 289C.  
from KFLG Lic - Bullhead City, AZ.
5. Figure 3, Channel Allocation Study for Ch. 272C2.  
from KJJJ Lic - Lake Havasu City, AZ.
6. Figure 4, Channel Allocation Study for Ch. 224C1.  
from KRCY Lic - Kingman, AZ.
7. Figure 5, Channel Allocation Study for Ch. 273A.  
from KDUQ Lic - Ludlow, CA.

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E., and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained to prepare an engineering statement in support of a Petition to Amend the FM Table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
John J. Mullaney

Executed on the 31st day of March 1999.

ENGINEERING EXHIBIT EE:

CENTENNIAL BROADCASTING LICENSE LLC  
FIVE STATION FM RULE MAKING  
SUBSTITUTION OF

FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV  
FM CHANNEL 289C FOR 274C - BULLHEAD CITY, AZ  
FM CHANNEL 272C2 FOR 224C2 - LAKE HAVASU CITY, AZ  
FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ  
FM CHANNEL 273A FOR 289A - LUDLOW, CA

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of Centennial Broadcasting License LLC, which presently operates FM Station KSTJ on Ch. 288C2 at Boulder City, Nevada. The purpose of this statement is to support a request that the FM Table of Allotments be amended to substitute Ch. 274C for 288C2 at Boulder City, NV. KSTJ is the only aural service licensed to Boulder City and the increase in power from Class C2 to Class C facilities will permit it to serve a wider area.

In order to upgrade KSTJ it is necessary to simultaneously substitute new channels at four other existing FM facilities and to dismiss the pending one-step application of one additional FM facility. The licensees of three of these facilities are in agreement with its proposed channel substitution or dismissal. All of the existing licensed sites are properly spaced on the replacement channels proposed herein.

It should be noted that the area in question is within 290 kilometers (180 miles) of the U.S. Border with Mexico and, therefore, Mexican concurrence is required.

II. ENGINEERING DISCUSSION:

A. Boulder City, NV:

Figure 1 is a channel allocation study for Ch. 274C from the licensed site of KSTJ at Boulder City, NV. The proposed allotment is short spaced to the existing operation of KFLG on Ch. 274C at Bullhead City, AZ. However, the simultaneous substitution proposed herein of Ch. 289C for KFLG will eliminate this short spacing.

KSTJ and KJJJ are separated by 171.4 km and, thus the proposed simultaneous substitution of 2nd adjacent 272C2 at Lake Havasu City, AZ, which requires a separation of 105 km does not create a conflict.

KSTJ and KDUQ are separated by 184.4 km and, thus the proposed simultaneous substitution of 1st adjacent 273A at Ludlow, CA, which requires a separation of 165 km does not create a conflict.

In all other respects this allotment is in compliance with the FCC spacing rules.

B. Bullhead City, AZ:

Figure 2 is a channel allocation study for Ch. 289C from the licensed site of KFLG at Bullhead City, AZ. KFLG has not agreed to be a party to this rule making. The proposed allotment is short spaced to five stations (seven data records) in the data base. On May 27, 1998, KFLG filed a 301 application (BPH-980527IA) requesting a correction in its licensed coordinates (0.77 km). These corrected coordinates have been used in this analysis. The

resulting short spacing will be resolved as follows:

KZUL at Lake Havasu City, AZ, has a pending one-step application to move from 283C2 to 286C2. KZUL has agreed to dismiss this application.

MM Docket 93-279 proposed to allot 285A as a new channel to Cal-Nev-Ari, AZ, or in the alternative to substitute 286C2 for use at Boulder City by KRRI (now KSTJ) & 289C2 for use at Las Vegas by KRBO (now KVBM). On July 17, 1995, the Staff denied all three of the proposals. While an application for review has been filed it should be understood that it only effects the denial of the new allotment at Cal-Nev-Ari. The denial of the requested substitutions at Boulder City & Las Vegas is not subject to the application for review. Consequently, the Boulder City & Las Vegas proposals are no longer entitled to protection. The current licensee of KSTJ (formerly KRRI) at Boulder City is the sponsor of this instant rule making and if need be herein requests dismissal of its original request to operate on 286C2 (Docket 93-279). Since this rule making proposal does not propose use of any channel between 282 to 288 it is clear that it can have no conflict with the resolution of the Cal-Nev-Ari proposal which involved 285A.

The requested simultaneous substitution of 274C for 288C2 at Boulder City will eliminate the short spacing that results if KFLG operates on 289C.

The requested simultaneous substitution of 273A for 289A at Ludlow, CA, will eliminate the short

spacing that results if KFLG operates on 289C.

The requested simultaneous substitution of 224C1 for 290C1 at Kingman, AZ, will eliminate the short spacing that results if KFLG operates on 289C.

In all other respects this allotment is in compliance with the FCC spacing rules.

C. Lake Havasu City, AZ:

Figure 3 is a channel allocation study for Ch. 272C2 from the licensed site of KJJJ at Lake Havasu City, AZ. KJJJ has agreed to be a party to this rule making. The proposed allotment is short spaced to the existing operation of KFLG on Ch. 274C at Bullhead City, AZ. However, the simultaneous substitution proposed herein of Ch. 289C will eliminate this short spacing.

KJJJ and KSTJ are separated by 171.4 km and, thus the proposed simultaneous substitution of 2nd adjacent 274C at Boulder City, NV, which requires a separation of 105 km does not create a conflict.

KJJJ and KDUQ are separated by 182.0 km and, thus the proposed simultaneous substitution of 1st adjacent 273A at Ludlow, CA, which requires a separation of 106 km does not create a conflict.

In all other respects this allotment is in compliance with the FCC spacing rules.

D. Kingman, AZ:

Figure 4 is a channel allocation study for Ch. 224C1 from the licensed site of KRCY at Kingman, AZ. KRCY has agreed to be a party to this rule making. The proposed allotment is short spaced to the existing operation of KJJJ on Ch. 224C2 at Lake Havasu City, AZ. However, the simultaneous substitution proposed herein of Ch. 272C2 will eliminate this short spacing. In all other respects this allotment is in compliance with the FCC spacing rules.

E. Ludlow, CA:

Figure 5 is a channel allocation study for Ch. 273A from the licensed site of KDUQ at Ludlow, CA. KDUQ has not agreed to be a party to this rule making. The proposed allotment is short spaced to the existing operation of KFLG on Ch. 274C at Bullhead City, AZ. However, the simultaneous substitution proposed herein of Ch. 289C will eliminate this short spacing.

KDUQ and KSTJ are separated by 184.4 km and, thus the proposed simultaneous substitution of 1st adjacent 274C at Boulder City, NV, which requires a separation of 165 km does not create a conflict.

KDUQ and KJJJ are separated by 182.0 km and, thus the proposed simultaneous substitution of 1st adjacent 273A at Ludlow, CA, which requires a separation of 106 km does not create a conflict.

In all other respects this allotment is in compliance with the FCC spacing rules.

**F. Public Interest Showing:**

KSTJ presently operates a Class C2 FM with 3.7 KW at 484m HAAT. The proposed substitution of Class C facilities will permit KSTJ to increase its power to 100 KW. The increase in power will increase the area contained within its present 60 dBu contour from 6,498 square kilometers to 22,859 square kilometers. This is an increase of 251 percent.

Since all of the stations being modified herein will remain at their currently licensed sites with no reduction in authorized ERP there is no doubt that they will continue to provide the required 70 dBu service to their respective city of license.

Based upon the above reasons KSTJ believes that the requested channel substitutions are in the public interest and should therefore be granted by the Commission.

Radio Station KSTJ - Boulder City, NV  
Five FM Stations in AZ, NV, CA

MULLANEY ENGINEERING, INC.

III. SUMMARY:

Centennial Broadcasting License LLC, licensee of Radio Station KSTJ requests that the FM Table of Allotments be amended as follows:

City	Present	Proposed
Boulder City, NV	288C2-->286C2	274C
** Bullhead City, AZ	274C	289C
Lake Havasu City, AZ	224C2 244C2, 266C1 283C2-->286C2	272C2 244C2, 266C1 283C2
Kingman, AZ	290C1 234C, 260C2-->261C2	224C1 234C, 260C2-->261C2
** Ludlow, CA	289A	273A

--> Pending RM or "One-Step" Application

\*\* Requires an Order to Show Cause

KSTJ believes that the proposed upgrade to Class C facilities of the only Full Time Service assigned to Boulder City, NV, will serve the public interest.

If allotted, KSTJ will promptly construct the Class C facilities and KSTJ agrees to reimburse all reasonable or agreed upon expenses associated with the other required channel changes.

March 31, 1999.

  
John J. Mullaney

KSTJ BLH890306KB 274 C FM POLARIZATION ERP (KW) HAAT RCAMSL  
 Boulder City NV US LIC HOR PLN BM TILT (METER) (METER)  
 35.5945 114.5151 (D.MMSS) HORIZONTAL 100.000 0.000 484.0 1110  
 AGM-Nevada, L.L.C. VERTICAL 3.700 0.000 484.0 1110

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 483.9 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC DBU KM	AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
					70 DBU	60 DBU
CO CHANNEL ( 40.0)	189.6	0.0	478.6	1570.2	60.8	85.4
1ST ADJACENT ( 54.0)	127.8	45.0	672.2	2205.2	70.4	94.6
2ND ADJACENT ( 80.0)	44.4	90.0	549.8	1803.8	65.4	89.6
3RD ADJACENT (100.0)	12.4	135.0	419.8	1377.1	57.4	81.2
		180.0	488.4	1602.4	61.4	86.0
		225.0	427.4	1402.1	57.8	81.8
PROTECTED ( 60.0)	85.7	270.0	342.8	1124.6	52.9	75.6
		315.0	492.2	1614.9	61.7	86.3
CITY GRADE ( 70.0)	61.1	AVERAGE	483.9	1587.5	61.1	85.7

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 363.9 KM ON A BEARING OF 177.9 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)		HAAT (M)	D I-CON A F5010	P-CON F5050	IR DIST (KM)	IC RSEP (KM)	REZLT IR IC (KM)
FROM	TO									HORZ	VERT						
312.8	132.2	KPXC	ADD	RM8846	Indian Sp NV	A	36.4141	115.4837	2ND 272C	H	V	0			115.0	105.	
**COMMENT**Site Restriction 18.4km Northwest-Alternate Channel **DOCKET**96-171 **																	
312.8	132.3	KPXC	ADD	RM8846	Indian Sp NV	A	36.4142	115.4837	2ND 276C	H	V	0			115.0	105.	
236.9	55.0	KIISFM	LIC	BLH5361	Los Angel CA	A	34.1336	118.0357	CO 274B	8.0H	8.0V	902D			351.7	274.	
**COMMENT**Grandfathered at 8.0 kW ERP at 902 meters HAAT																	
172.5	352.6	KFLGFM	LIC	BLH910808KA	Bullhead AZ	A	35.1456	114.4437	CO 274C	53.0H	53.0V	734			83.6	290.	S
172.9	353.0	KFLGFM	APP	BPH980527IA	Bullhead AZ	A	35.1508	114.4504	CO 274C	53.0H	53.0V	734			83.1	290.	S
262.3	80.6	KSSI	LIC	BLH950410KG	China Lak CA	A	35.3906	117.4058	CO 274A	3.00H	3.00V	-6			257.6	226.	
109.6	291.6	KQST	LIC	BLH961028KC	Sedona AZ	A	34.5805	111.3029	1ST 275C	100.B	100.B	437			325.2	241.	
**COMMENT**From Channel 261A per D87-76																	

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CONFLICT WITH KFLG-FM APP RESOLVED BY SUBSTITUTING 289C

KSTJ - CHANNEL ALLOCATION STUDY  
 FIVE STATION FM RULE MAKING  
 BOULDER CITY, NV  
 BULLHEAD / LAKE HAVASU / KINGMAN, AZ  
 LUDLOW, CALIFORNIA

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND  
 FIGURE 1  
 MARCH 1999

K	M	BPH980527IA	289 C	FM	POLARIZATION	ERP (KW)	HAAT	RCAMSL
Bullhead City AZ	US		APP.		HOR PLN	BM TILT	(METER)	(METER)
35.1508	114.4504	(D.MMSS)		HORIZONTAL	53.000	0.000	734.0	1501
Continental Radio Broadcasting, LLC				VERTICAL	53.000	0.000	734.0	1501

THE FOLLOWING CONTOURS ARE CALCULATED USING: CALCULATED HAAT FROM TOPO DATA BASE

ERP= 53.000 (KW) 17.2 (DBK) HAAT= 694.7 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
		0.0	640.0	2099.5	62.5 86.9
CO CHANNEL ( 40.0)	189.3	45.0	771.7	2531.7	67.0 91.5
1ST ADJACENT ( 54.0)	130.8	90.0	849.7	2787.8	69.2 94.1
2ND ADJACENT ( 80.0)	46.4	135.0	824.0	2703.2	68.5 93.2
3RD ADJACENT (100.0)	11.8	180.0	581.0	1906.0	60.3 84.6
		225.0	633.7	2079.1	62.3 86.7
PROTECTED ( 60.0)	88.8	270.0	661.2	2169.2	63.2 87.6
		315.0	596.3	1956.3	60.9 85.3
CITY GRADE ( 70.0)	64.4	AVERAGE	694.7	2279.1	64.4 88.8

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 281.2 KM ON A BEARING OF 179.4 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH	LAT	LONG	ERP (KW)	HAAT D	I-CON	P-CON	IR	IC	REZLT
FROM TO CALL STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL CHN	HORZ VERT	(M) A F5010 F5050	DIST RSEP RSEP IR IC	(KM) (KM) (KM)
146.7 327.0 KZULFM APP	BPH980213IB	Lake Hava AZ	A	34.3306 114.1137	3RD 286C2	1.05H1.05V	814	92.9 105.	S
**COMMENT**One-Step Application-From Channel 283C2									
353.0 172.9 KSTJ ADD	RM8385	Boulder C NV	A	35.5945 114.5151	3RD 286C2	H V	0	83.1 105.	S
**COMMENT**Counterproposal-Petition Denied 950717-Application for Review**DOCKET**93-279 **									
353.0 172.9 KSTJ LIC	BLH890306KB	Boulder C NV	A	35.5945 114.5151	1ST 288C2	3.7H 3.7V	484D	83.1 188.	S
353.0 172.9 KSTJ DEL	RM8385	Boulder C NV	A	35.5945 114.5151	1ST 288C2	H V		83.1 188.	S
335.6 155.2 KVBCFM DEL	RM8385	Las Vegas NV	A	36.2000 115.2141	3RD 286C2	H V	0	132.0 105.	
**COMMENT**Counterproposal-Petition Denied 950717-Application for Review**DOCKET**93-279 **									
335.6 155.2 KVBCFM LIC	BLH930914KA	Las Vegas NV	A	36.2000 115.2141	3RD 286C2	50.0H50.0V	11	132.0 105.	
335.6 155.2 KVBCFM ADD	RM8385	Las Vegas NV	A	36.2000 115.2141	CO 289C2	H V		132.0 249.	S
200.0 19.6 KZAL LIC	BLH861215KB	Desert Ce CA	A	33.3915 115.2700	1ST 288A	.058H.058V	599	188.5 165.	
229.5 48.3 KXRS LIC	BLH881116KE	Hemet CA	A	33.4117 116.5532	CO 289A	.170H.170V	312	264.6 226.	
103.9 285.4 KVRDFM LIC	BLH971110KI	Cottonwoo AZ	A	34.4111 112.0658	CO 289C3	0.30H0.30V	779	248.7 237.	
245.9 65.1 KDUQ LIC	BLH950718KB	Ludlow CA	A	34.4321 116.1004	CO 289A	6.0H 6.0V	-50	142.1 226.	S
124.7 305.0 KRCY LIC	BLH931108KB	Kingman AZ	A	35.0158 114.2157	1ST 290C1	17.H 17.V	576	42.7 209.	S
296.8 116.0 ADD	RM9470	Tecopa CA	A	35.5048 116.1324	2ND 291A	H V	0	148.9 95.	

\*\*\*\*\*  
 THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CONFLICT WITH	KZUL	APP	RESOLVED BY	DISMISSAL OF ONE STEP APP
CONFLICT WITH	KSTJ	RM	RESOLVED BY	RULE MAKING WAS DENIED
CONFLICT WITH	KSTJ	LIC	RESOLVED BY	SUBSTITUTING 274C
CONFLICT WITH	KVBC	RM	RESOLVED BY	RULE MAKING WAS DENIED
CONFLICT WITH	KDUQ	LIC	RESOLVED BY	SUBSTITUTING 273A
CONFLICT WITH	KRCY	LIC	RESOLVED BY	SUBSTITUTING 224C1

KFLG - CHANNEL ALLOCATION STUDY  
 FIVE STATION FM RULE MAKING  
 BOULDER CITY, NV  
 BULLHEAD / LAKE HAVASU / KINGMAN, AZ  
 LUDLOW, CALIFORNIA

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND  
 FIGURE 2  
 MARCH 1999

KJJJ	BLH940601KA	272 C2	FM	POLARIZATION	ERP (KW)	HAAT	RCAMSL
Lake Havasu City AZ	US		LIC	HOR PLN	BM TILT	(METER)	(METER)
34.3306	114.1137 (D.MMSS)			HORIZONTAL	0.720	0.000	814.0
Steven M. Greeley				VERTICAL	0.720	0.000	814.0

THE FOLLOWING CONTOURS ARE CALCULATED USING: CALCULATED HAAT FROM TOPO DATA BASE  
 ERP= 0.720 (KW) -1.4 (DBK) HAAT= 812.8 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL ( 40.0)	119.1	0.0	805.7	2643.4	27.6 48.2
1ST ADJACENT ( 54.0)	72.1	45.0	753.9	2473.4	26.7 46.7
2ND ADJACENT ( 80.0)	13.9	90.0	668.6	2193.4	25.2 43.9
3RD ADJACENT (100.0)	1.9	135.0	729.7	2393.8	26.3 45.9
		180.0	876.0	2873.9	28.8 50.0
PROTECTED ( 60.0)	48.4	225.0	1018.0	3340.0	31.1 52.9
		270.0	994.0	3261.0	30.7 52.5
		315.0	656.2	2153.0	24.9 43.5
CITY GRADE ( 70.0)	27.7	AVERAGE	812.8	2666.5	27.7 48.4

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 209.2 KM ON A BEARING OF 193.6 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH		LAT		LONG		ERP (KW)		HAAT D		I-CON		P-CON		IR		IC		REZLT		
FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL	CHN	HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR IC	
																(KM)	(KM)	(KM)	(KM)	(KM)
84.9	266.1	KAHM	LIC	BLH960111BK	Prescott	AZ A	34.4114	112.0701	1ST 271C	58.B	58.B	770				191.0	188.		C	
248.5	67.4	KJJZ	CP	BPH961031IE	Indio	CA A	33.5214	116.1339	CO 272A	2.6H	2.6V	1010				202.1	166.			
246.5	65.4	KJJZ	LIC	BLH930401KE	Indio	CA A	33.4807	116.1329	CO 272A	0.6H	0.6V	179				204.9	166.			
329.0	148.0	KPXC	ADD	RM8846	Indian Sp	NV A	36.4141	115.4837	CO 272C	H	V	0				279.3	249.			
**COMMENT**Site Restriction 18.4km Northwest-Alternate Channel **DOCKET**96-171 **																				
193.6	13.3	XHLPSF	OPE		San Luis	SO M	32.2930	114.4700	1ST 273B	3.0H	V	100				235.0	170.			
124.0	305.2	KNIXFM	LIC	BMLH870814KA	Phoenix	AZ A	33.1958	112.0353	1ST 273C	100.B	100.B	494				238.8	188.			
327.3	146.9	KFLGFM	LIC	BLH910808KA	Bullhead	AZ A	35.1456	114.4437	2ND 274C	53.0H	53.0V	734				92.2	105.		S	
327.0	146.7	KFLGFM	APP	BPH980527IA	Bullhead	AZ A	35.1508	114.4504	2ND 274C	53.0H	53.0V	734				92.9	105.		S	

\*\*\*\*\*  
 THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CONFLICT WITH KFLG-FM APP RESOLVED BY SUBSTITUTING 289C

KJJJ - CHANNEL ALLOCATION STUDY  
 FIVE STATION FM RULE MAKING  
 BOULDER CITY, NV  
 BULLHEAD / LAKE HAVASU / KINGMAN, AZ  
 LUDLOW, CALIFORNIA

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND  
 FIGURE 3  
 MARCH 1999

KRCY	BLH931108KB	224 C1	FM	POLARIZATION	ERP (KW)	HAAT	RCAMSL
Kingman AZ	US		LIC		HOR PLN	BM TILT	(METER)
	35.0158	114.2157	(D.MMSS)	HORIZONTAL	17.000	0.000	576.0
Hualapai Broadcasters, Inc.				VERTICAL	17.000	0.000	576.0
							1361

THE FOLLOWING CONTOURS ARE CALCULATED USING: CALCULATED HAAT FROM TOPO DATA BASE  
 ERP= 17.000 (KW) 12.3 (DBK) HAAT= 576.2 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
		0.0	289.2	948.7	34.7 54.3
CO CHANNEL ( 40.0)	160.4	45.0	465.5	1527.4	43.3 65.4
1ST ADJACENT ( 54.0)	106.8	90.0	601.6	1973.8	49.8 73.5
2ND ADJACENT ( 80.0)	30.7	135.0	404.4	1326.7	40.5 61.7
3RD ADJACENT (100.0)	7.3	180.0	501.8	1646.3	45.1 67.9
		225.0	839.5	2754.2	57.4 81.6
PROTECTED ( 60.0)	72.4	270.0	807.0	2647.6	56.5 80.7
		315.0	700.3	2297.7	53.3 77.2
CITY GRADE ( 70.0)	48.8	AVERAGE	576.2	1890.3	48.8 72.4

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 258.9 KM ON A BEARING OF 187.4 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH		LAT		LONG		ERP (KW)		HAAT D		I-CON		P-CON		IR		IC		REZLT		
FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL	CHN	HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR IC	
																(KM)	(KM)	(KM)	(KM)	(KM)
315.6	134.9	KOMP	LIC	BLH960913KB	Las Vegas NV A	35.5757	115.3003	2ND	222C	25.0H	25.0V	1124				146.0	105.			
16.7	197.3	KSSD	LIC	BLH7203	Cedar Cit UT A	37.3841	113.2228	1ST	223C	41.H	41.V	515				303.2	209.			
231.6	50.5	KKUU	LIC	BLH971020KE	Indio CA A	33.4745	116.1319	CO	224A	6.0H	6.0V	100				219.0	200.			
163.6	343.7	KJJJ	LIC	BLH940601KA	Lake Hava AZ A	34.3306	114.1137	CO	224C2	0.72H	0.72V	814				55.7	224.		S	
251.7	70.0	KELT	LIC	BLH970715KC	Riverside CA A	34.1151	117.1710	CO	224A	6.H	6.V	100				283.4	200.			
280.2	98.3	KZIQFM	LIC	BLH900403KB	Ridgecres CA A	35.2839	117.4158	CO	224B1	1.50H	1.50V	395				307.4	233.			
90.7	272.4	KAFFFM	LIC	BLH891016KC	Flagstaff AZ A	34.5807	111.3024	1ST	225C	100.B	100.B	461				261.1	209.			
315.6	135.0	KQOLFM	LIC	BLH941228KD	Las Vegas NV A	35.5802	115.3006	2ND	226C	24.0H	24.0V	1141				146.2	105.			

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CONFLICT WITH KJJJ LIC RESOLVED BY SUBSTITUTING 272C2

<p>KRCY - CHANNEL ALLOCATION STUDY                  FIVE STATION FM RULE MAKING                  BOULDER CITY, NV                  BULLHEAD / LAKE HAVASU / KINGMAN, AZ                  LUDLOW, CALIFORNIA</p>	<p>MULLANEY ENGINEERING, INC.                  GAITHERSBURG, MARYLAND  <b>FIGURE 4</b>                  MARCH 1999</p>
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KDUQ	BLH950718KB	273 A	FM	POLARIZATION	ERP (KW)	HAAT	RCMSL
Ludlow CA	US		LIC		HOR PLN	BM TILT	(METER)
34.4321	116.1004	(D.MMSS)		HORIZONTAL	6.000	0.000	-50.0
First American Communications Corpor				VERTICAL	6.000	0.000	-50.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 6.000 (KW) 7.8 (DBK) HAAT= -55.3 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC		AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
	DBU	KM				70 DBU	60 DBU
CO CHANNEL ( 40.0)	68.3		0.0	136.7	448.6	19.1	32.6
1ST ADJACENT ( 54.0)	23.5		45.0	6.5	21.3	8.9	15.8
2ND ADJACENT ( 80.0)	4.9		90.0	-50.3	-164.9	8.9	15.8
3RD ADJACENT (100.0)	1.6		135.0	-19.0	-62.5	8.9	15.8
			180.0	-165.7	-543.6	8.9	15.8
			225.0	-175.8	-576.8	8.9	15.8
PROTECTED ( 60.0)	15.8		270.0	-74.5	-244.4	8.9	15.8
			315.0	-100.3	-329.1	8.9	15.8
CITY GRADE ( 70.0)	8.9		AVERAGE	-55.3	-181.4	8.9	15.8

\*\*\*THE MEXICAN BORDER IS 233.1 KM ON A BEARING OF 174.7 DEG. TRUE\*\*\*

AZIMUTH		LAT		LONG		ERP (KW)		HAAT D		I-CON		P-CON		IR		IC		REZLT		
FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL	CHN	HORZ	VERT	(M)	A	F5010	F5050	DIST	RSEP	RSEP	IR	IC
																(KM)	(KM)	(KM)	(KM)	(KM)
183.3	3.3	KJZ	CP	BPH961031IE	Indio	CA A	33.5214 116.1339	1ST	272A	2.6H	2.6V	1010				94.7	72.			
182.9	2.9	KJZ	LIC	BLH930401KE	Indio	CA A	33.4807 116.1329	1ST	272A	0.6H	0.6V	179				102.2	72.			
249.9	69.3	KZYFM	LIC	BLH920428KB	Apple Val	CA A	34.2440 117.1109	1ST	272A	6.0H	6.0V	100.D				99.6	72.			
8.3	188.5	KPXC	ADD	RM8846	Indian Sp	NV A	36.4141 115.4837	1ST	272C	H	V	0				221.2	165.			
**COMMENT**Site Restriction 18.4km Northwest-Alternate Channel **DOCKET**96-171 **																				
8.3	188.5	KPXC	ADD	RM8846	Indian Sp	NV A	36.4142 115.4837	3RD	276C	H	V	0				221.2	95.			
152.3	333.0	XHLPSF	OPE		San Luis	SO M	32.2930 114.4700	CO	273B	3.0H	V	100				278.8	240.			
197.2	16.8	XHUANF	OPE		Tijuana	BN M	32.2914 116.5920	CO	273B	0.40H	V	238				259.4	240.			
65.3	246.1	KFLGFM	LIC	BLH910808KA	Bullhead	AZ A	35.1456 114.4437	1ST	274C	53.0H	53.0V	734				142.5	165.			S
65.1	245.9	KFLGFM	APP	BPH980527IA	Bullhead	AZ A	35.1508 114.4504	1ST	274C	53.0H	53.0V	734				142.1	165.			S

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CONFLICT WITH KFLG-FM APP RESOLVED BY SUBSTITUTING 289C

KDUQ - CHANNEL ALLOCATION STUDY  
 FIVE STATION FM RULE MAKING  
 BOULDER CITY, NV  
 BULLHEAD / LAKE HAVASU / KINGMAN, AZ  
 LUDLOW, CALIFORNIA

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND  
 FIGURE 5  
 MARCH 1999

MAY-12-99 09:44 FROM: POWER STAFFING INC

ID: 5025688812

PAGE 3

MAY-07-99 14:02 FROM: POWER STAFFING INC

ID: 5025688812

PAGE 2

EXHIBIT B-1

DECLARATION

Under penalty of perjury, I hereby declare as follows.

I am the licensee of Station KJLJ(FM), Lake Havasu City, Arizona. Station KJLJ(FM) is presently assigned to operation on Channel 22402.

I support the petition for rule making being submitted to the Federal Communications Commission by Centennial Broadcasting Licensee, LLC, one element of which would, if adopted, result in the substitution of Channel 22402 for Channel 22402 in Lake Havasu City, and the modification of my license accordingly.

BY: [Signature]  
TITLE: OWNER  
DATE: 5/12/99

Received Event (Event Succeeded)

Date: 5/10/99

Time: 11:35 AM

Pages: 3

Duration: 0 min 57 sec

Sender: 5025688812

Company:

Fax Number:

Subject:

Type: Fax

MAY-10-99 14:17 FROM: POWER STAPPING INC

ID: 5025688812

PAGE 2

DECLARATION

EXHIBIT B-2

Under penalty of perjury, I hereby declare as follows:

1. I am an officer of HUALAPAI Broadcasters, Inc. ("HUALAPAI"), which owns Station KRCY(FM), Kingman, Arizona. Station KRCY(FM) is presently assigned to operate on Channel 290C1.

2. HUALAPAI supports the petition for rule making being submitted to the Federal Communications Commission by Centennial Broadcasting Licensee, LLC, one element of which would, if adopted, result in the substitution of Channel 224C1 for Channel 290C1 in Kingman, and the modification of HUALAPAI's license accordingly.

BY: [Signature]  
TITLE: Vice President  
DATE: 5/12/99

Received Event (Event Succeeded)

Date: 5/17/99  
Pages: 2  
Sender: 202 778 2222  
Fax Number:  
Type: Fax

Time: 12:44 PM  
Duration: 0 min 45 sec  
Company:  
Subject:

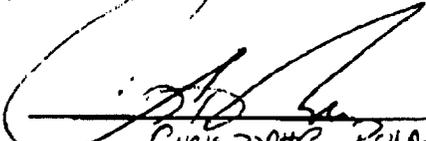
05/17/99 15:46 DOW LONES & ALBERT. → M D W , 1 NO.182 002

EXHIBIT B-3

**DECLARATION**

Under penalty of perjury, I hereby declare as follows:

1. I am an officer of Mad Dog Wireless, Inc. ("Mad Dog"), which owns station KZUL(FM), Lake Havasu City, Arizona. Station KZUL(FM) is presently assigned to operate on Channel 283C2, although a proposal is pending to reassign the station to Channel 286C2.
2. Mad Dog supports the petition for rule making being submitted to the Federal Communications Commission by Centennial Broadcasting Licensee, LLC, one element of which would, if adopted, result in the dismissal of the presently pending reassignment proposal and which would, as a result, leave Station KZUL(FM) on Channel 283C2.

By:   
 Title: President *CHRIS RODRIGUEZ RODRIGUEZ*  
 Date: 5/17/99

**CERTIFICATE OF SERVICE**

I, Vicki Lynne Lyttle, a secretary at Dow, Lohnes & Albertson, PLLC, do hereby certify that on this 18th day of May, 1999, I had copies of the foregoing "Petition for Rulemaking" delivered via first-class mail, postage pre-paid, to the following:

David S. Dantzic, Esquire  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20004  
(Counsel to KFLG(FM))

Robert Olender, Esquire  
Baraff, Koerner & Olender  
Three Bethesda Metro Center  
Suite 640  
Bethesda, MD 20814-5392  
(Counsel to KJJJ(FM), KRCY(FM), and KZUL(FM))

Anne Paxson, Esquire  
Borsari & Paxson  
2033 M Street, N.W.  
Suite 630  
Washington, D.C. 20036  
(Counsel to KDUQ(FM))

  
\_\_\_\_\_  
Vicki Lynne Lyttle