

BARAFF, KOERNER & OLENDER, P.C.

ATTORNEYS AT LAW

THREE BETHESDA METRO CENTER, SUITE 640

BETHESDA, MARYLAND 20814-5392

DC (202) 686-3200

MD (301) 986-0500

FAX (301) 986-4844

ROBERT L. OLENDER*
JAMES A. KOERNER

June 9, 1999

B. JAY BARAFF (Ret)

OF COUNSEL
ROBERT BENNETT LUBIC*

*NOT ADMITTED IN MD

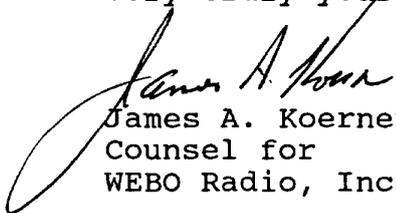
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals, TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Ms. Salas:

On behalf of WEBO Radio, Inc., licensee of Radio Station WLTB(FM), Owego, New York, there are transmitted herewith an original and four (4) copies of a Petition for Rule Making, filed pursuant to Section 1.420(i) of the Rules, seeking the re-allocation of Channel 269A from Owego, New York to Johnson City, New York.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,


James A. Koerner,
Counsel for
WEBO Radio, Inc.

cc: Mr. Steven J. Gilinsky

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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New Community of License (“Change of Community R & O”), 4 FCC Rcd 4870 (1989),
recon. granted in part (“Change of Community MO & O”), 5 FCC Rcd 7094 (1990).

Specifically, the requested allotment is mutually-exclusive with the present assignment of WLTB, and this proposal will not remove the last operating station from the presently assigned community.

Besides WLTB, Station WEBO (AM), commonly-owned, is assigned to Owego, New York, and is in operation. It is believed that such operation will continue for the foreseeable future.

The reallocation proposed herein will satisfy the first priority in the allotment of FM channels, the first local aural service to a community of appreciable size. Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

Johnson City is an incorporated community with a 1990 population of 16,890, compared to 4,442 for Owego. It is located in Broome County, which had a 1990 population of 212,160. Owego is located in Tioga County, which had a 1990 population of 52,337.

Johnson City is located between Binghamton and Endicott. Because of its accessibility to three major highways, Johnson City plays a significant role in the commercial life of the area. Oakdale Mall, a regional shopping center, draws people from a wide area. Johnson City has its own government, police and fire departments. It is the home of a major regional hospital and related medical offices serving the entire area. Its school system, the Johnson City Central School District, is well recognized in the state.

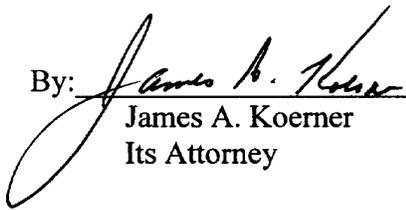
The Engineering Statement attached hereto demonstrates that a reference site, presently the transmitter site of a translator rebroadcasting the WLTB signal, meets all of the spacing requirements for a full Class A FM station. Further, a Class A FM station operating from that location would provide city grade service (70 dbu) to all of Johnson City.

WEBO represents that if the re-allotment herein proposed is granted, it will promptly take appropriate steps to implement the change, including the filing of a minor change application, and to construct the facility in accordance with the resulting construction permit.

Accordingly, it is requested that the FM Table of Allotments be modified to delete Channel 269A from Owego, New York, and to allot it to Johnson City, New York.

Respectfully submitted,

WEBO RADIO, INC.

By: 

James A. Koerner
Its Attorney

Baraff, Koerner & Olender, P.C.
3 Bethesda Metro Center
Suite 640
Bethesda, MD 20814
(301) 986-0500

June 9, 1999

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WEBO RADIO, INC. ("WEBO"), licensee of WLTB(FM), Channel 269A in Owego, New York, in support of its Petition for Rulemaking to change the city of license to Johnson City, New York.

Exhibit B is a computer spacing study for an assumed site near Johnson City. The site is located 6.4 kilometers south-southeast of the center of Johnson City and is the licensed transmitter site of W273AB, a translator owned by WEBO that presently rebroadcasts the signal of WLTB into Binghamton. The coordinates for this reference site are 42-03-44, 75-56-37. As shown in Exhibit B, the site meets all of the FCC spacing requirements for a full Class A FM station (the equivalent of 6 kw at 100 meters above average terrain). Due to the spacing requirements to WXHC in Homer, New York, it is requested that the proposed Johnson City allotment on Channel 269A be site-restricted to an area at least 6 kilometers south-southeast of the center of Johnson City.

Exhibit C is a tabulation of terrain and contour data for a hypothetical facility located at the reference site. Based upon the Defense Mapping Agency's 3-second terrain database, and assuming an antenna radiation center identical to that of W273AB, the antenna height above average terrain is 186 meters. Since this exceeds the maximum height for a 6 kw Class A station, the effective radiated power has been reduced to 1.7 kw in order to achieve equivalent coverage. The height above average terrain toward Johnson City (340 degrees true) is 43 meters greater than the average of the other eight radials. In addition, there are no obvious terrain obstacles between the reference site and the proposed community of license.

SMITH AND FISHER

EXHIBIT A

Exhibit D is a map upon which the predicted 70 dBu contour is plotted in relation to the city limits of Johnson City. Clearly, the hypothetical facility places a principle city contour over the entirety of Johnson City.

In further support of the Petition for Rulemaking, a review of the FCC's AM and FM station databases reveals that there are presently no audio services licensed to the community of Johnson City.

I declare under penalty of perjury that the foregoing statements and attached engineering exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 2, 1999

Smith and Fisher
Washington, DC

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FM Spacing study

Title: Johnson City, New York
Channel 269A (101.7 MHz)
Database: DW 05/26/99

Latitude: 42-03-44
Longitude: 75-56-37
Safety zone: 20 km

Call City of License	Auth Licensee name St FCC File no.	Chan ERP-kW Freq EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
NEW Carbondale	Broadcasting for the Cha PA BPED-980101MI	*215A 90.9 -128	41-34-23 75-30-07	145.9 326.2	65.56 55.56	10 CLEAR
WSQE Corning DA: oddball	WSKG Public Telecommunic NY BLED-950830KA ODD940524MA @ 205 deg	*216B1 3.60DA 91.1 199	42-06-20 76-52-17	273.9 93.3	76.92 64.92	12 CLEAR
WBUG-FM Fort Plain	Roser Communications Net NY BLH-910312KD	266A 101.1 219	42-52-44 74-47-07	45.9 226.7	131.5 100.5	31 CLEAR
WGGY Scranton	Sinclair Radio of Wilkes PA BMLH-940816KE	267B 101.3 338	41-25-38 75-44-53	167.0 347.1	72.38 3.378	69 CLOSE
WXHC Homer	Eves Broadcasting, Inc. NY BLH-940912KB	268A 101.5 151	42-41-12 76-11-54	343.3 163.1	72.47 .467	72 CLOSE
WMSC Upper Montclair TO CHANNEL *212D	Montclair State College NJ BLED-840412BX	*268D 101.5 210	40-51-53 74-12-03	131.9 313.1	197.2	
WLTB Owego DA: oddball	WEBO Radio, Inc. NY BLH-940310KA ODD930723IA @ 0 deg	269A 101.7 170	42-06-07 76-07-14	286.9 106.8	15.29 -99.7	115 SHORT
WFLK Geneva	M B Communications Inc. NY BMLH-960118KB	269A 101.7 38	42-51-34 77-00-29	315.8 135.1	124.5 9.531	115 CLOSE
WJIV Cherry Valley	WJIV Radio, Inc. NY BLH-941219KF	270B 101.9 312	42-47-36 74-41-41	51.2 232.0	131.0 17.99	113 CLEAR
WWHW Jeffersonville	William H. Walker, III NY BPH-950206MF	271A 102.1 77	41-44-30 74-51-23	111.2 292.0	96.99 65.99	31 CLEAR
WAVR Waverly	WATS Broadcasting, Inc. NY BLH-640101	272A 102.3 122	42-03-48 76-31-28	270.3 90.0	48.08 17.08	31 CLEAR

>> End of channel 269A study <<

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Washington, DC

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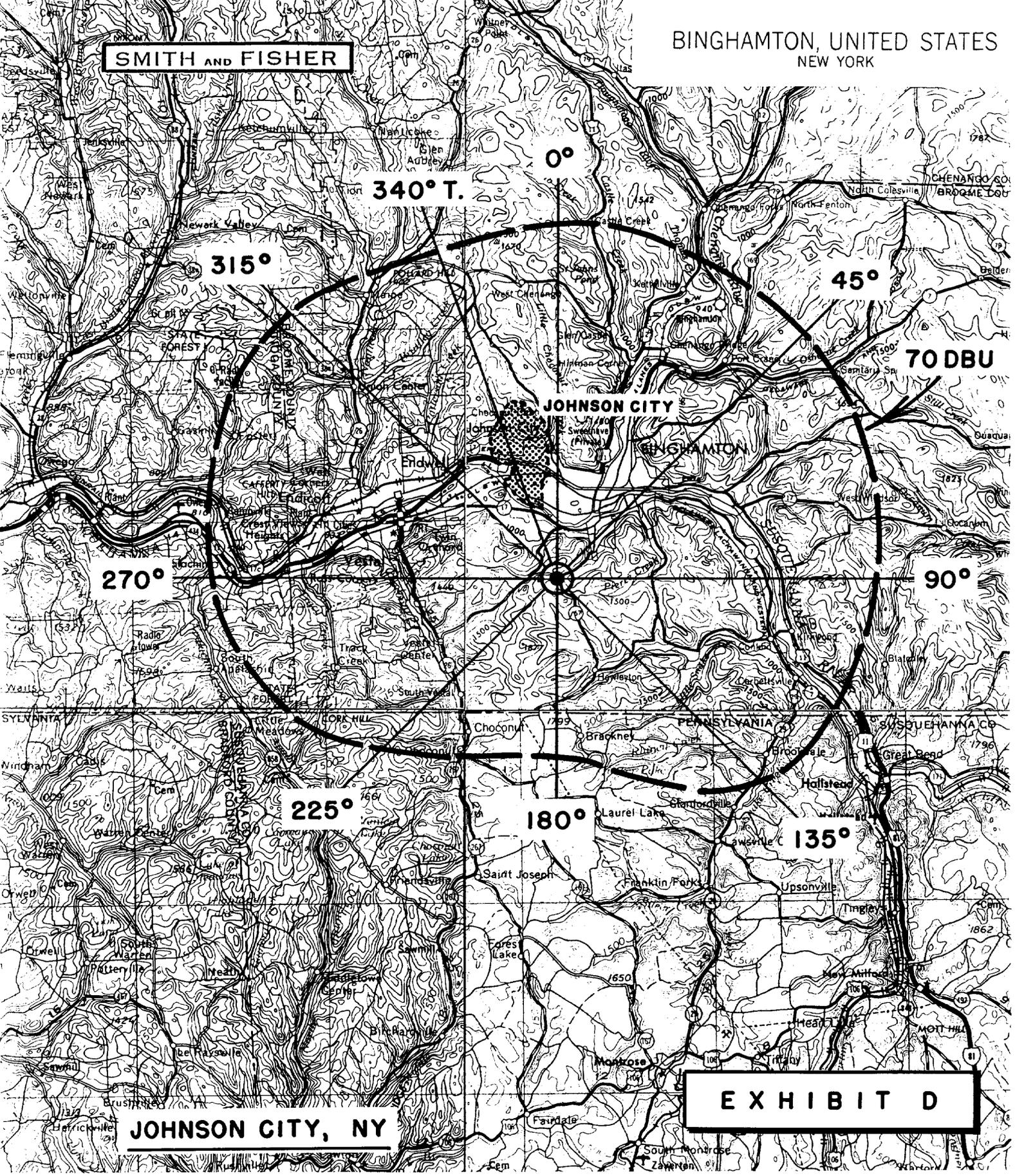
Service contours based on FCC F[50,50] curves

Title: Owego/Johnson City Latitude: 42-03-44
Channel: 269 C/R 579.0 meters (1899.6 feet) A.M.S.L. Longitude: 75-56-37

Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	70 dBu (3.16 mV/m) contour
.0	242.3	1.700	18.5 km
	794.9	2.304	11.5 mi
45.0	226.5	1.700	17.9 km
	743.1	2.304	11.1 mi
90.0	189.2	1.700	16.3 km
	620.7	2.304	10.1 mi
135.0	154.7	1.700	14.6 km
	507.5	2.304	9.1 mi
180.0	61.2	1.700	9.3 km
	200.8	2.304	5.8 mi
225.0	118.7	1.700	12.7 km
	389.4	2.304	7.9 mi
270.0	219.0	1.700	17.6 km
	718.5	2.304	10.9 mi
315.0	273.6	1.700	19.7 km
	897.6	2.304	12.2 mi
* 340.0	228.9	1.700	18.0 km
	751.0	2.304	11.2 mi
HAAT:	185.7		
	609.1		

Note: Radial(s) denoted by "*" not included in HAAT calculation.

SMITH AND FISHER



JOHNSON CITY, NY

EXHIBIT D

