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JUL 29 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking
Plainville, Kansas

Dear Ms. Salas:

Transmitted herewith on behalf of Radio, Inc., licensee of Station KFIX(FM), Plainville, Kansas, are an original and four copies of a Petition for Rulemaking requesting the Commission to amend the FM Table of Allotments by (i) substituting Channel 245C1 for Channel 245C2 at Plainville, Kansas, and (ii) substituting Channel 255A for Channel 244A at Larned, Kansas.

Should any questions arise concerning this matter, please communicate directly with this office.

Very truly yours,
FLETCHER, HEALD & HILDRETH, P.L.C.



Andrew S. Kersting
Counsel for Radio, Inc.

Enclosure

cc (w/ encl.): Certificate of Service (by hand & first-class mail)

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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JUL 29 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations,)
(Plainville and Larned, Kansas))

MM Docket No. _____
RM No. _____

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Radio, Inc. ("Radio"), by counsel, and pursuant to Section 1.401 of the Commission's rules, hereby requests the Commission to institute a rulemaking proceeding for the purpose of amending the FM Table of Allotments to (i) substitute Channel 245C1 for Channel 245C2 at Plainville, Kansas, and modify the license of Station KFIX(FM), Plainville, to specify operation on Channel 245C1; and (ii) substitute Channel 255A for Channel 244A at Larned, Kansas, and modify the license of Station KGTR(FM), Larned, to specify operation on Channel 255A. Accordingly, Radio proposes to amend Section 73.202(b) of the Commission's rules as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Plainville, KS	245C2	245C1
Larned, KS	244A, 295C1	255A, 295C1

In support of this request, the following is stated:

As demonstrated in Larry P. Waggoner's attached engineering statement,¹ if the FCC were to substitute Channel 255A for Channel 244A at Larned, the proposed upgrade of Channel 245C2 to Channel 245C1 at Station KFIX's licensed transmitter site would meet the minimum distance separation requirements with respect to all known licenses, construction permits, open allotments, pending applications, and pending rulemaking petitions.² See Appendix A, p. 1 and Exhibit #3a. Moreover, because the proposed upgrade of Channel 245C2 to Channel 245C1 can be implemented from KFIX's licensed transmitter site, Station KFIX will continue to provide a coverage contour in excess of the required 70 dBu over the entire Plainville community. *Id.* at Exhibit #4c.

As also demonstrated in the attached engineering statement, the proposed upgrade of Channel 245 at Plainville to a Class C1 facility and the proposed substitution of Channel 255A for Channel 244A at Larned would have substantial public interest benefits. Station KFIX's licensed 1 mV/m contour encompasses 36,619 persons within an area of 7,318 square kilometers ("sq. km"). The 1 mV/m contour of the proposed Class C1 facility at Plainville could cover 52,614 persons within an area of 15,228 sq. km. See Appendix A, p. 2. Thus, the proposed upgrade of Station KFIX to Channel 245C1 at Plainville would result in approximately a 44% increase in population and a 108% increase in area served within the station's 1 mV/m contour.

¹ Mr. Waggoner's supporting engineering statement is attached hereto as Appendix A.

² As reflected in the attached engineering statement, the reference coordinates for KGTR's licensed transmitter site at Larned are separated from Station KFIX's licensed transmitter site at Plainville by a distance of 100.3 km. The required distance separation between Class C1 and Class A stations operating on first-adjacent channels (*i.e.*, Channel 245 and Channel 244) is 133 km. See Appendix A, p. 1; 47 CFR §73.207(b). As Mr. Waggoner noted, Channel 221A also is available as an alternate substitute channel for KGTR at Larned. Appendix A, p. 1.

The proposed upgrade of Channel 245C2 to Channel 245C1 at Plainville also would bring an additional reception service to underserved areas. The proposed Class C1 upgrade of Station KFIX would bring a third full-time reception service to 255 people within an area of 308.9 sq. km., which includes the counties of Gove, Ness, and Trego in Kansas. Appendix A, p. 2. The Class C1 upgrade also would bring a fourth full-time reception service to 3,136 people within an area of 1,129.8 sq. km., and a fifth full-time reception service to 1,504 persons within an area of 975.0 sq. km. *Id.* Therefore, the proposed substitution of Channel 245C1 for Channel 245C2 at Plainville would serve the public interest because it furthers the Commission's allotment priorities by providing service to underserved areas.³ *Chateaugay, New York*, 9 FCC Rcd 3957, 3957-58 (1994).

With respect to the proposed substitution of Channel 255A for Channel 244A at Larned, Station KGTR currently operates with an effective radiated power ("ERP") of 3 kilowatts ("kw") at a height of 82 meters above average terrain ("HAAT"). Station KGTR could upgrade to a full-powered Class A facility at Larned by operating with 6 kw on Channel 255A.⁴ *See* Appendix A, p. 2. In addition, if Channel 255A were to be substituted for Channel 244A at Larned, Station KGTR could upgrade to Channel 255C3 at its licensed transmitter site. *Id.* at 1. Moreover, if the KGTR transmitter were moved a minimum distance of 5.5 km east-northeast from its licensed site, Station

³ 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 factors. Co-equal weight is given to priorities (2) and (3). *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1982).

⁴ Although Station KGTR also could upgrade to 6 kw on its existing Channel 244A, as demonstrated herein, Channel 255 is preferable because it is only on Channel 255 that Station KFIX could be upgraded to a Class C3 or Class C2 facility. *See* Appendix A, pp. 1-2.

KGTR could upgrade to a Class C2 facility on Channel 255.⁵ *Id.* at 2. The respective gains in population and area within Station KGTR's 1 mV/m contour operating as a 6 kw Class A, Class C3, and Class C2 facility are reflected in the following table:

Station Class/ ERP & HAAT	Population (1 mV/m)	Area (sq. km)	Population Increase (%) ⁶	Area Increase (%)
Class A - 3 kw @ 100 m	7,699	1,500	---	---
Class A - 6 kw @ 100 m	8,585	2,089	11.5%	39.3%
Class C3 - 25 kw @ 100 m	30,659	3,994	298.2%	166.2%
Class C2 - 50 kw @ 150 m	47,522	8,491	517.2%	466.1%

As shown above, if Station KGTR were to upgrade to a Class C3 facility at its licensed transmitter site, KGTR's protected 1 mV/m contour would cover nearly four (4) times its current population and more than two and one-half (2½) times its current service area. If KGTR elected to move its transmitter at least 5.5 km to the C2 Reference Site, it could upgrade to a Class C2 facility, whereby its protected 1 mV/m contour would serve more than six (6) times its current population and cover over five and one-half (5½) times its current service area.

⁵ Mr. Waggoner stated that there is an area consisting of over 600 sq. km to the northeast, east, and southeast of Larned in which KGTR could move its transmitter and satisfy the Class C2 spacing requirements on Channel 255C2. There are a number of potential site locations in this area that would enable KGTR to continue to provide a city-grade signal over the entire Larned community. Appendix A, p. 2. Station KGTR could implement the potential upgrade from Channel 255A to Channel 255C2 through a one-step application. *Id.* at 3.

⁶ The respective increases in population and areas served, as reflected in the above table, are based on Station KGTR's licensed Class A facility operating with 3 kw at 82 meters HAAT. The population and area data associated with the potential Class C2 facility are based on a hypothetical transmitter site located at North Latitude: 38° 11' 32"; West Longitude: 99° 02' 32" ("C2 Reference Site"). See Appendix A, p. 2 and Exhibit #5c.

Furthermore, if Station KGTR were to upgrade to a Class C2 facility at the C2 Reference Site, the station would bring a new full-time reception service to substantial white and gray areas. As demonstrated in the attached engineering statement, if KGTR were to operate on Channel 255C2 at the C2 Reference Site, the station would bring a first reception service to 2,837 people within an area of 862.3 sq. km, which includes 75% of Edwards County, Kansas. The potential Class C2 upgrade also would bring a first full-time reception service to the entire population of the community of Kinsley, which is the county seat of Edwards County. *See* Appendix A, p. 3. Moreover, the potential Class C2 upgrade of Channel 255 at Larned would bring a second full-time reception service to 1,012 persons within an area of 1,088.2 sq. km. *Id.* Therefore, the potential upgrade of Station KGTR from Channel 255A to Channel 255C2 would serve the substantial public interest of promoting the first and second allotment priorities. *See, e.g., Wray and Otis, Colorado*, 13 FCC Rcd 2612, 2613 (1998) (service to gray areas would fulfill allotment priority 2).

The Commission has repeatedly held that the substitution of an existing station's channel serves the public interest where the substitution permits the provision of a new or expanded service at another community. *See Coleman, Sebewaing and Tuscola, Michigan*, 11 FCC Rcd 11286, 11287-88 (Allocations Branch 1996), citing *Marietta, Ohio and Ravenswood, West Virginia*, 2 FCC Rcd 4681 (Allocations Branch 1987); *Albany, New York et al.*, 2 FCC Rcd 4300 (Policy and Rules Div. 1987). As demonstrated above, the proposed upgrade of Station KFIX from Channel 245C2 to Channel 245C1 at Plainville and the proposed substitution of Channel 255A for Channel 244A at Larned not only would provide expanded service at Plainville, including significant service to underserved areas, but it also would provide an opportunity for KGTR to upgrade to a Class C2

facility, which, at the C2 Reference Site, would bring a first and second full-time reception service to a significant number of people within substantial white and gray areas. *See Appendix A, p. 3.*

In the event the reallocation proposal set forth herein is granted, Radio will file an application for a construction permit for Channel 245C1 at Plainville, and, upon grant of its application, will promptly construct the new Class C1 facility. Radio also will reimburse the licensee of Station KGTR, Larned, for its reasonable and prudent costs associated with implementing the requested change in frequency.

WHEREFORE, in light of the foregoing, Radio, Inc. respectfully requests that the Commission GRANT this Petition for Rulemaking, AMEND the FM Table of Allotments in the manner set forth herein, and MODIFY (i) the license of Station KFIX, Plainville, Kansas, to specify operation on Channel 245C1 in lieu of Channel 245C2; and (ii) the license of Station KGTR, Larned, Kansas, to specify operation on Channel 255A in lieu of Channel 244A.

Respectfully submitted,

RADIO, INC.

By: _____


Susan A. Marshall
Andrew S. Kersting

Its Counsel

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July 29, 1999
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APPENDIX A

Engineering Statement of Larry P. Waggoner

RADIO, INC.
KFIX(FM)

**ENGINEERING STUDY
IN SUPPORT OF
A PETITION TO CHANGE
THE TABLE OF FM
ALLOCATIONS**

Part 73.202

**UP-GRADING
CHANNEL #245C1
PLAINVILLE, KANSAS**

June 30, 1999

LARRY P. WAGGONER

Broadcast Technical Consultant

1712 VALLEYVIEW CT.

WICHITA, KS 67212

(316) 722-3726

Engineering Statement
KFIX(FM) Radio, Inc.
Channel #245, Plainville, Kansas

I, Larry P. Waggoner, have been retained by Radio, Inc. to prepare this Engineering Study in support of their petition to amend the Part 73.202 Table of FM Allotments. The petition is to up-grade the Channel #245C2 (96.9 MHz) listing for Plainville, Kansas to Channel #245C1. Radio, Inc. is now licensed to operate KFIX, serving Plainville on that channel.

There is only one channel allotment for Plainville. The amended entry for the city would read:

Plainville, Kansas 245C1

Exhibit #1 is a Class C1 separation study conducted on the coordinates of the licensed KFIX transmitter site (N39°01'15"-W99°28'12")(BLH-980508KC). The study disclosed only one short spaced station. KGTR, Channel #244A, Larned, Kansas, (BLH-861208KD) is located 100.3 kilometers distant on a bearing of 161.2°. The Larned station is 32.7 km short spaced of the required 133 km separation for a first adjacent Class C1 to Class A station.

Exhibit #2 shows the results of a frequency search for alternate channels that could be assigned for KGTR. Two channels were found that would meet the required Class A spacing. Channel #255A was chosen to minimize the distance of the frequency change. Channel #221A also could be allocated to Larned.

There are two channel allotments for Larned. The amended entry for the city would read:

Larned, Kansas 255A, 295C1

Three separation studies were conducted on Channel #255 using the coordinates of the licensed KGTR transmitter site (N38°09'54'-W99°06'05"). Please refer to Exhibit #3 for the detailed separation data. The station could easily up-grade to Class C3 from the licensed site.

LARRY P. WAGGONER
Broadcast Technical Consultant

1712 VALLEYVIEW CT. • WICHITA, KS 67212 • (316) 722-3726

Class C2 operation could be achieved with a site restriction 5.5 kilometers east-northeast of the present tower (N38°11'32"W99°02'32"). This site is later referred to as the Exhibit #5b2 site. There is an area exceeding 600 km² to the northeast, east and southeast of Larned where KGTR could meet Class C2 spacing requirements on Channel #255. The site area is made up of farm and pasture land offering multiple site locations all of which would provide signals in excess of 3.16 mv/m or city grade over all of the principal community with no terrain blockage.

Exhibit #4 documents the contour and population comparison study for KFIX. The population inside the protected 1.0 mv/m contour increases from 36,619 for the present licensed C2 operation to 52,614 for the proposed Class C1 up-grade. All population data used in this report was obtained from the 1990 US Census. The area inside the contour would increase from 7,318 km² to 15,228 km².

Exhibit #5 details the contour and population comparison study for KGTR. The licensed 3,000 watt coverage is compared with possible Channel #255 up-upgrades to 6 kw and 25 kw from the licensed site. The third comparison is to full 50 kw ERP, 150 meter HAAT Channel #255C2 operation from the Exhibit #5b2 site east of Larned. The present 7,699 population and an area of 1,500 km² inside the protected contour could be increased to 47,522 persons and an area of 8,491 km² inside the Class C2 60 dBu contour. The comparisons for the two other KGTR options are shown in Exhibit #5.

Exhibit #6 is a map showing the full time aural broadcast reception services in the KFIX service area. All FM contours in the exhibit are 1.0 mv/m. The three AM contours are the calculated nighttime interference free contours. The proposed KFIX Class C1 up-grade would provide the third service to an area of 308.9 km² in Gove, Ness and Trego counties west, southwest of the transmitter site. The population of the area is 225 persons. The Class C1 up-grade would also provide four areas of fourth service and three areas of fifth service. The fourth service area measures 1,129.8 km², with a population of 3,136. The fifth service area measures 975.0 km², with a population of 1,504.

The Exhibit #7 map shows the full time aural services in the KGTR service area. The FM contours are again 1.0 mv/m and the two AM contours the calculated nighttime interference free contours. The large outer circle is the 1.0 mv/m contour of a possible Channel #255C2 up-grade for KGTR. The one step change could be filed after this proposed allocation change is approved. The Exhibit #5b2 site was used to calculate the contours. Class C2 coverage would offer first reception service for 75% of Edwards County, Kansas, including all of the population Kinsley, the county seat. The area of first service measures 862.3 km², with a population of 2,837. An even larger area of second service would be provided, measuring 1,088.2 km², with a population of 1,012.

Channel #245C1 can be allocated to Plainville, Kansas, once KGTR has made the frequency change to Channel #255. At that time KFIX, operating Class C1 from the present licensed site, would be in full compliance with the minimum distance separation listed in Part 73.207 of the Commission's Rules. All statements made and the data presented in this report is true and accurate to the best of my knowledge and ability.


Larry P. Waggoner
Broadcast Technical Consultant

EXHIBIT #1

06-17-1999

Larry Waggoner

PAGE 1

FM Study for: KFIX	FCC Database Date: 6/1999	39-01-15
Location: PLAINVILLE, KS	Channel Class: C1	99-28-12
Call City, State	Chan Class Freq kW Latitude Dist.	Required
Status Proponent	File Number HAAT Longitude Azm.	Clear (km)

 >>>>>> Study For Channel 245 96.9 MHz <<<<<<<<

KFIX	PLAINVILLE, KS	245 C2	96.9	10.5	39-01-15	0.0	224	73.215	
LIC	Radio, Inc.	BLH-980508KC	267		99-28-12	0.0	-224.0	SHORT	
KGTR	LARNED, KS	244 A	96.7	3.00	38-09-54	100.3	133		
LIC	C&C Consulting, Inc.	BLH-861208KD	81		99-06-05	161.2	-32.7	SHORT	
	Use of 73.215 for short spacing requires: 111							-10.7	SHORT
KZDY	CAWKER CITY, KS	242 C3	96.3	13.0	39-30-29	113.3	76	73.215	
LIC	Waconda Broadcasting	BLH-981217KC	70		98-18-57	61.1	+37.3	CLEAR	
KBBE	MCPHERSON, KS	244 A	96.7	6.00	38-20-30	173.8	133		
LIC	Davies Communications	BMLH-941031KC	75		97-40-12	115.1	+40.8	CLEAR	
KSKU	HUTCHINSON, KS	246 C3	97.1	13.5	37-57-54	185.4	144		
LIC	Shank Communications	BLH-990119KG	137		97-49-26	128.7	+41.4	CLEAR	
KNID	ENID, OK	245 C1	96.9	100.	36-32-14	304.2	245		
LIC	Chisholm Trail Broadc	BLH-810316AL	137		98-00-36	154.5	+59.2	CLEAR	
*To Channel 245C per one-step application 970428IE									
KZKX	SEWARD, NE	245 C1	96.9	100.	41-07-26	324.2	245		
LIC	Triathlon Broadcastin	BLH-7204	177		96-50-03	43.1	+79.2	CLEAR	
APPL. MUST SPECIFY AT LEAST 100 KW & 650 FT HAAT OR EQUIVALENT									
KKJQ	GARDEN CITY, KS	247 C1	97.3	100.	37-46-48	162.6	82		
LIC	KBUF Partnership	BLH-840810DA	244		100-27-36	212.4	+80.6	CLEAR	
KBGU	INGALLS, KS	242 C1	96.3	100.	37-38-28	171.2	82		
CP	Eagle Radio, Inc.	BPH-960722MA	201		100-20-40	206.8	+89.2	CLEAR	
KELN	NORTH PLATTE, NE	246 C1	97.1	100.	41-14-20	267.5	177		
LIC	Valley Communications	BLH-790315AF	140		100-41-43	337.4	+90.5	CLEAR	

EXHIBIT #2a

06-17-1999

Larry Waggoner

PAGE 1

FM Study for: KGTR
Location: LARNED, KS

FCC Database Date: 6/1999
Channel Class: A

38-09-54
99-06-05

Chan 221	92.1	HIT COUNT:	0	MAX OVERLAP:	+19	←
Chan 222	92.3	HIT COUNT:	1	MAX OVERLAP:	-48	
Chan 223	92.5	HIT COUNT:	3	MAX OVERLAP:	-38	
Chan 224	92.7	HIT COUNT:	3	MAX OVERLAP:	-21	
Chan 225	92.9	HIT COUNT:	2	MAX OVERLAP:	-91	
Chan 226	93.1	HIT COUNT:	2	MAX OVERLAP:	-152	
Chan 227	93.3	HIT COUNT:	3	MAX OVERLAP:	-91	
Chan 228	93.5	HIT COUNT:	3	MAX OVERLAP:	-78	
Chan 229	93.7	HIT COUNT:	5	MAX OVERLAP:	-43	
Chan 230	93.9	HIT COUNT:	1	MAX OVERLAP:	-90	
Chan 231	94.1	HIT COUNT:	2	MAX OVERLAP:	-23	
Chan 232	94.3	HIT COUNT:	1	MAX OVERLAP:	-57	
Chan 233	94.5	HIT COUNT:	2	MAX OVERLAP:	-37	
Chan 234	94.7	HIT COUNT:	1	MAX OVERLAP:	-62	
Chan 235	94.9	HIT COUNT:	2	MAX OVERLAP:	-14	
Chan 236	95.1	HIT COUNT:	1	MAX OVERLAP:	-56	
Chan 237	95.3	HIT COUNT:	2	MAX OVERLAP:	-23	
Chan 238	95.5	HIT COUNT:	3	MAX OVERLAP:	-90	
Chan 239	95.7	HIT COUNT:	2	MAX OVERLAP:	-23	
Chan 240	95.9	HIT COUNT:	2	MAX OVERLAP:	-30	
Chan 241	96.1	HIT COUNT:	2	MAX OVERLAP:	-31	
Chan 242	96.3	HIT COUNT:	3	MAX OVERLAP:	-76	
Chan 243	96.5	HIT COUNT:	2	MAX OVERLAP:	-72	
Chan 244	96.7	HIT COUNT:	2	MAX OVERLAP:	-115	
Chan 245	96.9	HIT COUNT:	2	MAX OVERLAP:	-72	
Chan 246	97.1	HIT COUNT:	4	MAX OVERLAP:	-31	
Chan 247	97.3	HIT COUNT:	2	MAX OVERLAP:	-73	
Chan 248	97.5	HIT COUNT:	2	MAX OVERLAP:	-29	
Chan 249	97.7	HIT COUNT:	1	MAX OVERLAP:	-19	
Chan 250	97.9	HIT COUNT:	2	MAX OVERLAP:	-80	
Chan 251	98.1	HIT COUNT:	2	MAX OVERLAP:	-73	
Chan 252	98.3	HIT COUNT:	2	MAX OVERLAP:	-61	
Chan 253	98.5	HIT COUNT:	1	MAX OVERLAP:	-21	
Chan 254	98.7	HIT COUNT:	1	MAX OVERLAP:	-8	
Chan 255	98.9	HIT COUNT:	0	MAX OVERLAP:	+14	→
Chan 256	99.1	HIT COUNT:	2	MAX OVERLAP:	-48	
Chan 257	99.3	HIT COUNT:	1	MAX OVERLAP:	-44	
Chan 258	99.5	HIT COUNT:	1	MAX OVERLAP:	-111	
Chan 259	99.7	HIT COUNT:	3	MAX OVERLAP:	-44	
Chan 260	99.9	HIT COUNT:	3	MAX OVERLAP:	-46	
Chan 261	100.1	HIT COUNT:	2	MAX OVERLAP:	-23	
Chan 262	100.3	HIT COUNT:	2	MAX OVERLAP:	-56	
Chan 263	100.5	HIT COUNT:	1	MAX OVERLAP:	-81	
Chan 264	100.7	HIT COUNT:	1	MAX OVERLAP:	-148	
Chan 265	100.9	HIT COUNT:	1	MAX OVERLAP:	-81	
Chan 266	101.1	HIT COUNT:	3	MAX OVERLAP:	-23	
Chan 267	101.3	HIT COUNT:	2	MAX OVERLAP:	-82	
Chan 268	101.5	HIT COUNT:	3	MAX OVERLAP:	-21	
Chan 269	101.7	HIT COUNT:	4	MAX OVERLAP:	-64	
Chan 270	101.9	HIT COUNT:	4	MAX OVERLAP:	-100	
Chan 271	102.1	HIT COUNT:	3	MAX OVERLAP:	-82	
Chan 272	102.3	HIT COUNT:	2	MAX OVERLAP:	-45	
Chan 273	102.5	HIT COUNT:	1	MAX OVERLAP:	-88	
Chan 274	102.7	HIT COUNT:	2	MAX OVERLAP:	-45	

EXHIBIT #2b

06-17-1999

Larry Waggoner

PAGE 2

FM Study for: KGTR
Location: LARNED, KS

FCC Database Date: 6/1999
Channel Class: A

38-09-54
99-06-05

Chan 275	102.9	HIT COUNT:	2	MAX OVERLAP:	-104
Chan 276	103.1	HIT COUNT:	4	MAX OVERLAP:	-65
Chan 277	103.3	HIT COUNT:	2	MAX OVERLAP:	-126
Chan 278	103.5	HIT COUNT:	5	MAX OVERLAP:	-65
Chan 279	103.7	HIT COUNT:	3	MAX OVERLAP:	-54
Chan 280	103.9	HIT COUNT:	2	MAX OVERLAP:	-48
Chan 281	104.1	HIT COUNT:	1	MAX OVERLAP:	-92
Chan 282	104.3	HIT COUNT:	1	MAX OVERLAP:	-159
Chan 283	104.5	HIT COUNT:	1	MAX OVERLAP:	-92
Chan 284	104.7	HIT COUNT:	1	MAX OVERLAP:	-34
Chan 285	104.9	HIT COUNT:	2	MAX OVERLAP:	-39
Chan 286	105.1	HIT COUNT:	1	MAX OVERLAP:	-19
Chan 287	105.3	HIT COUNT:	1	MAX OVERLAP:	-80
Chan 288	105.5	HIT COUNT:	1	MAX OVERLAP:	-19
Chan 289	105.7	HIT COUNT:	2	MAX OVERLAP:	-6
Chan 290	105.9	HIT COUNT:	2	MAX OVERLAP:	-73
Chan 291	106.1	HIT COUNT:	2	MAX OVERLAP:	-94
Chan 292	106.3	HIT COUNT:	2	MAX OVERLAP:	-43
Chan 293	106.5	HIT COUNT:	2	MAX OVERLAP:	-43
Chan 294	106.7	HIT COUNT:	1	MAX OVERLAP:	-101
Chan 295	106.9	HIT COUNT:	1	MAX OVERLAP:	-168
Chan 296	107.1	HIT COUNT:	1	MAX OVERLAP:	-101
Chan 297	107.3	HIT COUNT:	5	MAX OVERLAP:	-54
Chan 298	107.5	HIT COUNT:	3	MAX OVERLAP:	-43
Chan 299	107.7	HIT COUNT:	1	MAX OVERLAP:	-59
Chan 300	107.9	HIT COUNT:	1	MAX OVERLAP:	-126

EXHIBIT #3a

06-17-1999

Larry Waggoner

PAGE 1

FM Study for: KGTR	FCC Database Date: 6/1999	38-09-54
Location: LARNED, KS	Channel Class: A	99-06-05
Call City, State	Chan Class Freq kW Latitude Dist.	Required
Status Proponent	File Number HAAT Longitude Azm.	Clear (km)

>>>>>>> Study For Channel 255 98.9 mHz <<<<<<<< Class A

KHAZ	HAYS, KS	258 C1	99.5 100.+	38-56-29	89.0	75	
LIC	Eagle Radio, Inc.	BLH-900307KC	157	99-21-22	345.6	+14.0	CLOSE
KJIL	COPELAND, KS	256 C1	99.1 100.	37-28-35	152.5	133	
LIC	Great Plains Christia	bled-920914KB	285	100-35-59	240.4	+19.5	CLEAR
Commercial Channel operating educational							
KAYY	CLEARWATER, KS	254 C2	98.7 50.0	37-24-11	157.8	106	
LIC	Gary L. Violet	BLH-950627KB	150	97-35-22	122.0	+51.8	CLEAR
KTLI	EL DORADO, KS	256 C1	99.1 100.	37-56-22	187.1	133	73.215
LIC	Adonai Radio Group	BLH-960522KD	188	96-59-20	97.0	+54.1	CLEAR
From channel 256C2 per D89-476							
ALLOC	KIOWA, KS	252 C1	98.3	37-01-00	138.5	75	
VAC		Docket-96-65	0	98-29-12	156.7	+63.5	CLEAR
First Come/First Served Allotment. Applications may be filed which request that this allotment be downgraded, or one step applications may be filed to upgrade this allotment.							
KKPRFM	KEARNEY, NE	255 C1	98.9 100.	40-48-53	295.6	200	
LIC	Platte River Radio, I	BLH-870106KA	191	98-46-12	5.4	+95.6	CLEAR
KYIS	OKLAHOMA CITY, OK	255 C	98.9 100.	35-33-36	323.0	226	
LIC	Caribou Communication	BLH-840423CW	335	97-29-07	153.0	+97.0	CLEAR

EXHIBIT #3b

06-21-1999

Larry Waggoner

PAGE 1

FM Study for: KGTR
Location: LARNED, KS
Call City, State
Status Proponent

FCC Database Date: 6/1999
Channel Class: C3
Chan Class Freq kW Latitude Dist. Required
File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 255 98.9 MHz <<<<<<<< **Class C3**

KJIL	COPELAND, KS	256 C1	99.1	100.	37-28-35	152.5	144	
LIC	Great Plains Christia	BLED-920914KB	285	100-35-59	240.4	+8.5	CLOSE	
Commercial Channel operating educational								
KHAZ	HAYS, KS	258 C1	99.5	100.+	38-56-29	89.0	76	
LIC	Eagle Radio, Inc.	BLH-900307KC	157	99-21-22	345.6	+13.0	CLOSE	
KAYY	CLEARWATER, KS	254 C2	98.7	50.0	37-24-11	157.8	117	
LIC	Gary L. Violet	BLH-950627KB	150	97-35-22	122.0	+40.8	CLEAR	
KTLI	EL DORADO, KS	256 C1	99.1	100.	37-56-22	187.1	144	73.215
LIC	Adonai Radio Group	BLH-960522KD	188	96-59-20	97.0	+43.1	CLEAR	
From channel 256C2 per D89-476								

FM Study for: KGTR
Location: LARNED, KS
Call City, State
Status Proponent

FCC Database Date: 6/1999
Channel Class: C2
Chan Class Freq kW Latitude Dist. Required
File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 255 98.9 MHz <<<<<<<< **Class C2** ✓

KJIL	COPELAND, KS	256 C1	99.1	100.	37-28-35	152.5	158	
LIC	Great Plains Christia	BLED-920914KB	285	100-35-59	240.4	-5.5	SHORT	
Use of 73.215 for short spacing requires: 144								+8.5 CLOSE
Commercial Channel operating educational								
KHAZ	HAYS, KS	258 C1	99.5	100.+	38-56-29	89.0	79	
LIC	Eagle Radio, Inc.	BLH-900307KC	157	99-21-22	345.6	+10.0	CLOSE	
KAYY	CLEARWATER, KS	254 C2	98.7	50.0	37-24-11	157.8	130	
LIC	Gary L. Violet	BLH-950627KB	150	97-35-22	122.0	+27.8	CLEAR	
KTLI	EL DORADO, KS	256 C1	99.1	100.	37-56-22	187.1	158	73.215
LIC	Adonai Radio Group	BLH-960522KD	188	96-59-20	97.0	+29.1	CLEAR	
From channel 256C2 per D89-476								

ALLOC KIOWA, KS 252 C1 98.3 37-01-00 138.5 79
VAC Docket-96-65 0 98-29-12 156.7 +59.5 CLEAR
First Come/First Served Allotment. Applications may be filed which request that this allotment be downgraded, or one step applications may be filed to upgrade this allotment.

EXHIBIT #4a

06-21-1999

Larry Waggoner
Project: KFIX

Source Coordinates: 39-01-15 North 99-28-12 West

This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)
0	280	30.5	49.2
45	312	32.1	51.3
90	261	29.5	47.8
135	263	29.6	48.0
180	264	29.7	48.1
225	255	29.2	47.4
270	221	27.2	45.0
315	281	30.5	49.2

Class C2

Data in (feet) meters

Overall Height Above Average Terrain: (876) 267 *
Site Elevation AMSL: (2,270) 692
Antenna Height Above Ground Level: (745) 227
Antenna Center Above Sea Level: (3,015) 919
Overall Ground Average Terrain AMSL: (2,139) 652
Effective Radiated Power: 10.50 kW *
TV/FM Channel: 245

Larry Waggoner
Project: KFIX

Source Coordinates: 39-01-15 North 99-28-12 West

This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)
0	280	48.7	70.7
45	312	50.9	73.2
90	261	47.4	69.1
135	263	47.5	69.3
180	264	47.6	69.4
225	255	47.0	68.6
270	221	44.5	65.6
315	281	48.8	70.8

Class C1

Data in (feet) meters

Overall Height Above Average Terrain: (876) 267 *
Site Elevation AMSL: (2,270) 692
Antenna Height Above Ground Level: (745) 227
Antenna Center Above Sea Level: (3,015) 919
Overall Ground Average Terrain AMSL: (2,139) 652
Effective Radiated Power: 100.00 kW *
TV/FM Channel: 245

EXHIBIT #4b

Larry Waggoner

Project: KFIX

Source Coordinates: 39-01-15 North 99-28-12 West

Class C2

This program uses the 1990 US Census Database: PL 94-171
Group level centroid retrieval methodology
Distance to the Contours are interpolated between Azimuths
CONTOUR OF STUDY is 60 dBu.

AZM:	0	45	90	135	180	225	270	315
DIST:	49.2km	51.3km	47.8km	48.0km	48.1km	47.4km	45.0km	49.2km

KS, Ellis County	Population :	26,004	Households:	11,115
KS, Graham County	Population :	704	Households:	348
KS, Ness County	Population :	39	Households:	15
KS, Osborne County	Population :	504	Households:	305
KS, Rooks County	Population :	5,442	Households:	2,658
KS, Rush County	Population :	254	Households:	131
KS, Russell County	Population :	559	Households:	272
KS, Trego County	Population :	3,113	Households:	1,568

SUMMARY: Population : 36,619 Households: 16,412
Area within Contour by Sectoring: 7,318 sq. km
Land Area in Contour from Census: 6,984 sq. km

Project: KFIX

Source Coordinates: 39-01-15 North 99-28-12 West

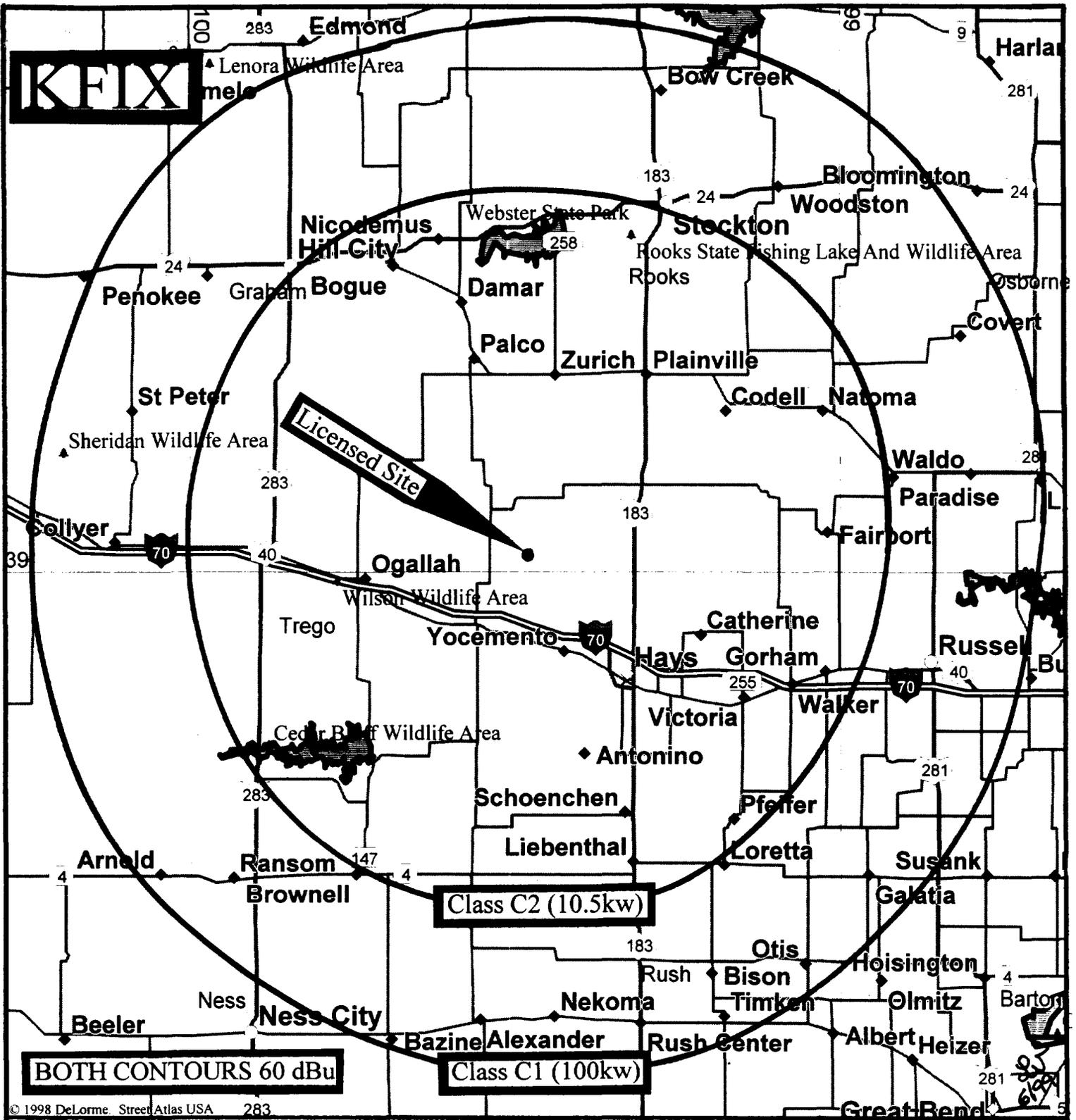
Class C1

This program uses the 1990 US Census Database: PL 94-171
Group level centroid retrieval methodology
Distance to the Contours are interpolated between Azimuths
CONTOUR OF STUDY is 60 dBu.

AZM:	0	45	90	135	180	225	270	315
DIST:	70.7km	73.2km	69.1km	69.3km	69.4km	68.6km	65.6km	70.8km

KS, Barton County	Population :	289	Households:	188
KS, Ellis County	Population :	26,004	Households:	11,115
KS, Gove County	Population :	349	Households:	120
KS, Graham County	Population :	3,479	Households:	1,715
KS, Ness County	Population :	1,392	Households:	745
KS, Norton County	Population :	46	Households:	40
KS, Osborne County	Population :	1,090	Households:	612
KS, Phillips County	Population :	91	Households:	56
KS, Rooks County	Population :	6,039	Households:	2,977
KS, Rush County	Population :	3,524	Households:	1,845
KS, Russell County	Population :	6,617	Households:	3,420
KS, Trego County	Population :	3,694	Households:	1,851

SUMMARY: Population : 52,614 Households: 24,684
Area within Contour by Sectoring: 15,228 sq. km
Land Area in Contour from Census: 14,912 sq. km



Mag 9.00
 Mon Jun 28 17:51 1999
 Scale 1:700,000 (at center)
 10 Miles
 20 KM

Class C2 Population: 36,619
 Area: 7,318 km²
 Class C1 Population: 52,614
 Area: 15,228 km²

EXHIBIT #4c

Larry P. Waggoner
 Broadcast Technical Consultant
 1712 N. Valleyview Court
 Wichita, Kansas 67212-1245
 316-722-3726

Larry Waggoner
Project: KGTR

EXHIBIT #5a1

06-21-1999

Source Coordinates: 38-09-54 North 99-06-05 West
This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)
0	83	12.3	22.0
45	98	13.4	23.9
90	91	12.9	23.0
135	82	12.2	21.9
180	74	11.7	20.9
225	77	11.9	21.3
270	79	12.0	21.5
315	68	11.2	20.1

Class A
3 kw

Data in (feet) meters
Overall Height Above Average Terrain: (269) 82 *
Site Elevation AMSL: (2,011) 613
Antenna Height Above Ground Level: (282) 86
Antenna Center Above Sea Level: (2,293) 699
Overall Ground Average Terrain AMSL: (2,028) 618
Effective Radiated Power: 3.0000 kW *
TV/FM Channel: 244

Larry Waggoner
Project: KGTR

Source Coordinates: 38-09-54 North 99-06-05 West
This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)
0	84	14.7	26.0
45	99	16.0	28.1
90	92	15.4	27.2
135	83	14.6	25.8
180	75	13.9	24.7
225	78	14.1	25.1
270	80	14.3	25.4
315	69	13.4	23.8

Class A
6 kw

Data in (feet) meters
Overall Height Above Average Terrain: (269) 82 *
Site Elevation AMSL: (2,011) 613
Antenna Height Above Ground Level: (286) 87
Antenna Center Above Sea Level: (2,297) 700
Overall Ground Average Terrain AMSL: (2,028) 618
Effective Radiated Power: 6.0000 kW *
TV/FM Channel: 255

EXHIBIT #5a2

06-21-1999

Larry Waggoner
Project: KGTR

Source Coordinates: 38-09-54 North 99-06-05 West
This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)

0	84	21.3	35.9
45	99	23.0	38.8
90	92	22.2	37.5
135	83	21.1	35.7
180	75	20.1	34.2
225	78	20.5	34.7
270	80	20.8	35.1
315	69	19.3	32.9

Class C3

	Data in (feet)	meters
Overall Height Above Average Terrain:	(269)	82 *
Site Elevation AMSL:	(2,011)	613
Antenna Height Above Ground Level:	(286)	87
Antenna Center Above Sea Level:	(2,297)	700
Overall Ground Average Terrain AMSL:	(2,028)	618
Effective Radiated Power:	25.00 kW	*
TV/FM Channel:	255	

Larry Waggoner
Project: KGTR

Source Coordinates: 38-11-32 North 99-02-32 West
This program uses the NGDC 30-Second Database.

F(50,50) Contours -----

AZM	HAAT	70 DB	60 DB
DEG	MTRS	(KM)	(KM)

0	145	32.0	51.4
45	170	34.5	54.3
90	162	33.7	53.5
135	153	32.8	52.4
180	144	31.9	51.3
225	141	31.6	50.9
270	137	31.2	50.3
315	147	32.2	51.7

Class C2

	Data in (feet)	meters
Overall Height Above Average Terrain:	(492)	150 *
Site Elevation AMSL:	(1,980)	604
Antenna Height Above Ground Level:	(517)	157
Antenna Center Above Sea Level:	(2,497)	761
Overall Ground Average Terrain AMSL:	(2,005)	611
Effective Radiated Power:	50.00 kW	*
TV/FM Channel:	255	

EXHIBIT #5b2

Larry Waggoner

Project: KGTR

Source Coordinates: 38-09-54 North 99-06-05 West

Class C3

This program uses the 1990 US Census Database: PL 94-171
Group level centroid retrieval methodology
Distance to the Contours are interpolated between Azimuths
CONTOUR OF STUDY is 60 dBu.

AZM:	0	45	90	135	180	225	270	315
DIST:	35.9km	38.8km	37.5km	35.7km	34.2km	34.7km	35.1km	32.9km

KS, Barton County	Population :	19,237	Households:	8,553
KS, Edwards County	Population :	918	Households:	475
KS, Pawnee County	Population :	7,186	Households:	3,220
KS, Rush County	Population :	413	Households:	219
KS, Stafford County	Population :	2,905	Households:	1,389

SUMMARY: Population : 30,659 Households: 13,856
Area within Contour by Sectoring: 3,994 sq. km
Land Area in Contour from Census: 3,869 sq. km

Project: KGTR

Source Coordinates: 38-11-32 North 99-02-32 West

Class C2

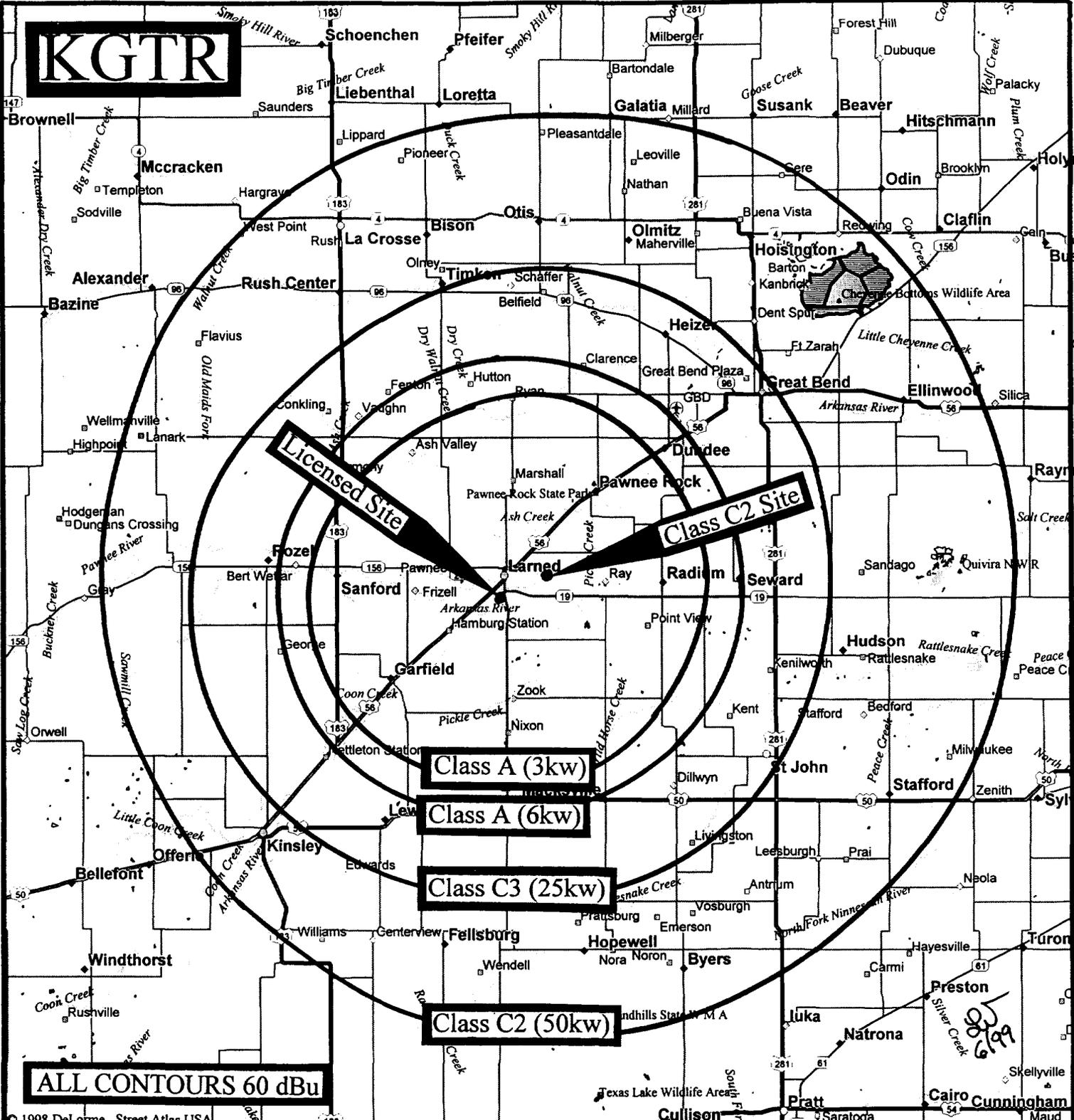
This program uses the 1990 US Census Database: PL 94-171
Group level centroid retrieval methodology
Distance to the Contours are interpolated between Azimuths
CONTOUR OF STUDY is 60 dBu.

AZM:	0	45	90	135	180	225	270	315
DIST:	51.4km	54.3km	53.5km	52.4km	51.3km	50.9km	50.3km	51.7km

KS, Barton County	Population :	27,889	Households:	12,426
KS, Edwards County	Population :	3,390	Households:	1,691
KS, Pawnee County	Population :	7,555	Households:	3,412
KS, Pratt County	Population :	208	Households:	103
KS, Rush County	Population :	3,228	Households:	1,650
KS, Stafford County	Population :	5,252	Households:	2,560

SUMMARY: Population : 47,522 Households: 21,842
Area within Contour by Sectoring: 8,491 sq. km
Land Area in Contour from Census: 8,209 sq. km

KGTR



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Mag 10.00
 Mon Jun 21 16:42 1999
 Scale 1:600,000 (at center)
 10 Miles
 20 KM

Larry P. Waggoner
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Class A (3kw) Population: 7,699
 Area: 1,500 km²
 Class A (6kw) Population: 8,585
 Area: 2,089 km²
 Class C3 (25kw) Population: 30,659
 Area: 3,994 km²
 Class C2 (50kw) Population: 47,522
 Area: 8,491 km²

EXHIBIT #5c

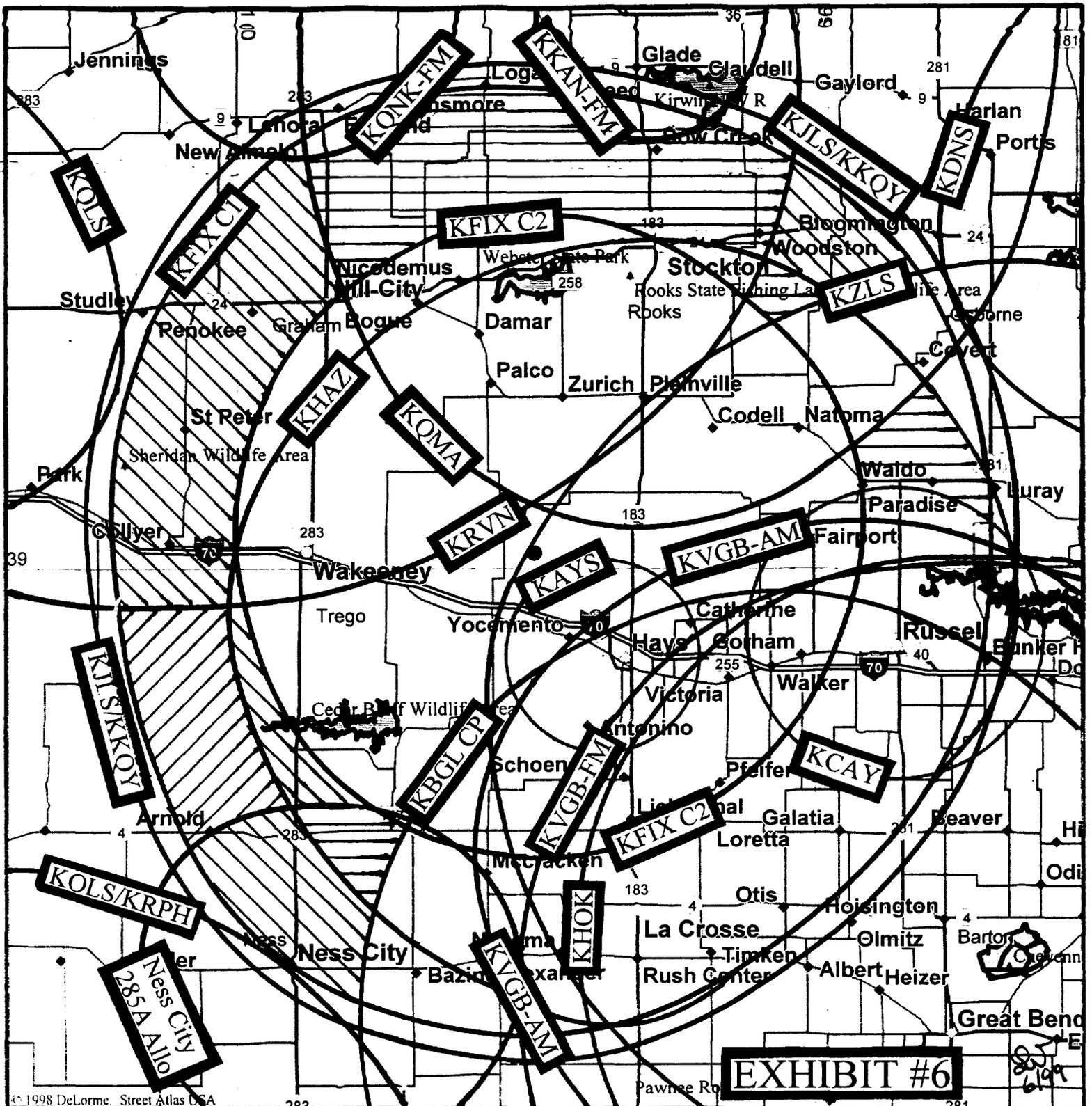
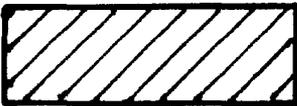
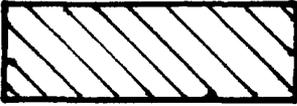
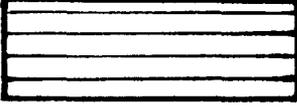


EXHIBIT #6

Mag 9.00
 Thu Jul 01 13:40 1999
 Scale 1:800,000 (at center)
 10 Miles
 20 KM

Larry P. Waggoner
 Broadcast Technical Consultant
 1712 N. Valleyview Court
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 316-722-3726

Third Service Reception Area	
Fourth Service Reception Area	
Fifth Service Reception Area	

<u>Third Service Reception</u>
Area: 308.9 km ²
Population: 225
<u>Fourth Service Reception</u>
Area: 1,129.8 km ²
Population: 3,136
<u>Fifth Service Reception</u>
Area: 975.0 km ²
Population: 1,504
(Population 1990 US Census)
(Area approximated by Simpson's Rule)

EXHIBIT #6A1
KFIX MARKET DATA

Larry Waggoner
FCC Database Date: 6 1999

PAGE 1

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KJLS
KQMA LIC	PHILLIPSBURG KS BLH-840726CY	223 Class C1	100.0 kW	39-37-02 99-17-55	68 km 13 dg	74 km 0 km
KRPB LIC	DODGE CITY KS BLH-971203KB	230 Class C1	100.0 kW	37-55-56 100-19-02	142 km 212 dg	71 km 69 km
KDNS LIC	DOWNS KS BLH-940428KS	231 Class C2	28.0 kW	39-30-29 98-18-57	113 km 61 dg	75 km 41 km
KKANFM LIC	PHILLIPSBURG KS BLH-840612CK	237 Class A	3.0 kW	39-47-32 99-19-55	86 km 8 dg	74 km 21 km
KOLS CP	DODGE CITY KS BMPH-980309IH	238 Class C1	100.0 kW	37-55-56 100-19-02	142 km 212 dg	71 km 69 km
KCAY LIC	RUSSELL KS BLH-850220KO	240 Class A	1.4 kW	38-54-22 98-51-39	54 km 103 dg	71 km 69 km
KFIX LIC	PLAINVILLE KS BLH-980508KC	245 Class C2	10.5 kW	39-01-15 99-28-12	0 km 0 dg	73 km 22 km
KHAZ LIC	HAYS KS BLH-900307KC	258 Class C1	100.0 kW DA	38-56-29 99-21-22	13 km 132 dg	72 km 22 km
KQLS LIC	COLBY KS BLH-5236	262 Class C1	100.0 kW	39-28-50 100-54-34	134 km 293 dg	71 km 64 km
KHOK LIC	HOISINGTON KS BLH-820521AX	264 Class C1	100.0 kW	38-32-49 98-45-59	81 km 130 dg	72 km 52 km
KKQY LIC	HILL CITY KS BLH-980508KD	270 Class C1	97.0 kW	39-01-15 99-28-12	0 km 0 dg	73 km 59 km
KJLS LIC	HAYS KS BLH-970909KE	277 Class C	100.0 kW	39-01-15 99-28-12	0 km 0 dg	73 km 59 km
KVGBFM LIC	GREAT BEND KS BLH-7258	282 Class C1	96.0 kW	38-25-54 98-46-18	89 km 137 dg	72 km 66 km
KQNKFM LIC	NORTON KS BLH-940429KB	294 Class A	3.0 kW	39-47-47 99-53-35	93 km 337 dg	74 km 26 km
KBGL CP	LARNED KS BPH-960730MA	295 Class C1	100.0 kW	38-27-06 99-10-03	68 km 157 dg	73 km 26 km

EXHIBIT #6A2
KFIX MARKET DATA

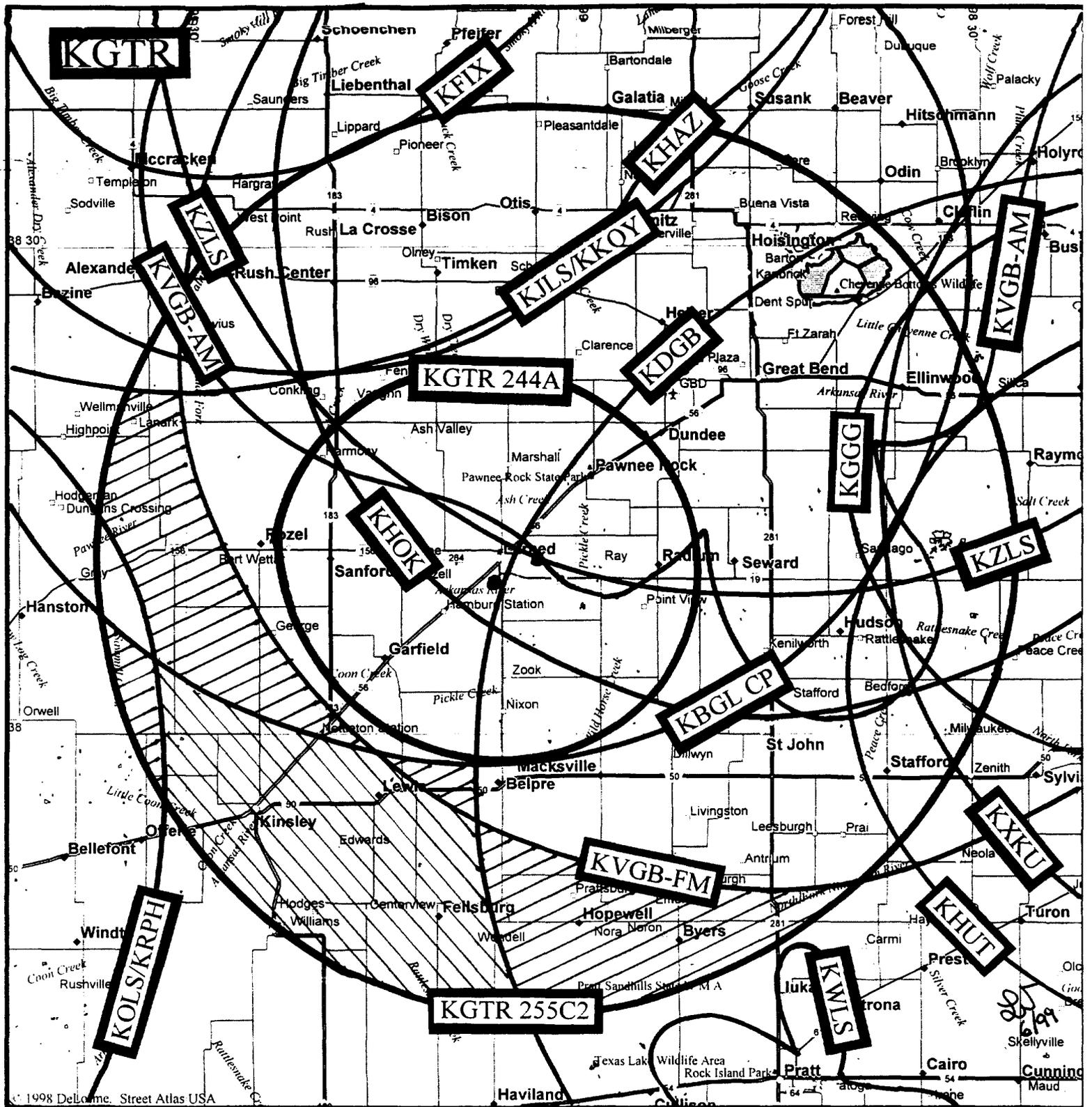
FCC Database Date: 6 1999

PAGE 2

CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KJLS
KZLS LIC	GREAT BEND KS BLH-860212KI	300 Class C1	99.0 kW	38-46-16 98-44-17	69 km 113 dg	71 km 26 km
KFRM LIC	SALINA KS BL-830914AC	550 Class D	5.0 kW DA	39-26-10 97-39-40	163 km 73 dg	74 km 138 km
KXXX LIC	COLBY KS BL-831005AD	790 Class D	5.0 kW ND	39-23-35 101-00-06	139 km 288 dg	70 km 83 km
KRVN LIC	LEXINGTON NE -	880 Class B	50.0 kW ND	40-31-03 99-23-20	166 km 2 dg	74 km 148 km
KRSL LIC	RUSSELL KS BL-850220AF	990 Class D	0.3 kW ND	38-54-22 98-51-39	54 km 103 dg	71 km 148 km
KVSV LIC	BELOIT KS BL-871116AA	1190 Class D	2.3 kW DA	39-26-53 98-04-45	129 km 68 dg	74 km 63 km
KAYS LIC	HAYS KS -	1400 Class C	1.0 kW ND	38-53-29 99-22-03	17 km 148 dg	73 km 55 km
KKAN LIC	PHILLIPSBURG KS -	1490 Class C	1.0 kW ND	39-47-32 99-19-55	86 km 8 dg	74 km 34 km
KNNS LIC	LARNED KS -	1510 Class D	1.0 kW ND	38-09-54 99-06-05	100 km 161 dg	73 km 36 km
KQNK LIC	NORTON KS -	1530 Class D	1.0 kW ND	39-49-37 99-52-08	96 km 339 dg	74 km 31 km
KVGB LIC	GREAT BEND KS -	1590 Class B	5.0 kW ND	38-18-50 98-47-35	98 km 143 dg	73 km 50 km

AM NIGHT OPERATION INTERFERENCE FREE CONTOURS

KAYS	18.76 mv/m
KRVN	4.73 mv/m
KVGB-AM	4.23 mv/m



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Mag 10 00
 Tue Jun 29 11:06 1999
 Scale 1:600,000 (at center)
 10 Miles
 20 KM

Larry P. Waggoner
 Broadcast Technical Consultant
 1712 N. Valleyview Court
 Wichita, Kansas 67212-1245
 316-722-3726

First Service
 Reception Area



Second Service
 Reception Area

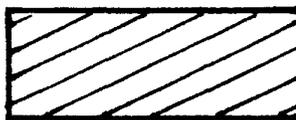


EXHIBIT #7

First Service Reception
 Area: 862.3 km²
 Population: 2,837

Second Service Reception
 Area: 1,088.2 km²
 Population: 1,012
(Population 1990 US Census)
(Area approximated by Simpson's Rule)

EXHIBIT #7A1
KGTR MARKET DATA

Larry Waggoner
FCC Database Date: 6 1999

PAGE 1

CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KGTR 5 mV/m
KGTR LIC	LARNED KS BLH-861208KD	244 Class A	3.0 kW	38-09-54 99-06-05	Source Station	
KDGB LIC	PRATT KS BLH-890126KB	226 Class C	100.0 kW	37-55-50 98-19-04	74 km 110 dg	59 km 123 km
KRPB LIC	DODGE CITY KS BLH-971203KB	230 Class C1	100.0 kW	37-55-56 100-19-02	110 km 257 dg	56 km 122 km
KGGG LIC	STERLING KS BLH-950817KD	234 Class C3	20.0 kW	38-16-33 98-12-11	80 km 81 dg	59 km 78 km
KOLS LIC	DODGE CITY KS BLH-880209KD	238 Class C1	100.0 kW	37-38-28 100-20-40	124 km 242 dg	55 km 112 km
KGTR LIC	LARNED KS BLH-861208KD	244 Class A	3.0 kW	38-09-54 99-06-05	0 km 0 dg	57 km 115 km
KFIX LIC	PLAINVILLE KS BLH-980508KC	245 Class C2	10.5 kW	39-01-15 99-28-12	100 km 341 dg	56 km 94 km
KHAZ LIC	HAYS KS BLH-900307KC	258 Class C1	100.0 kW DA	38-56-29 99-21-22	89 km 346 dg	57 km 112 km
KHOK LIC	HOISINGTON KS BLH-820521AX	264 Class C1	100.0 kW	38-32-49 98-45-59	52 km 35 dg	59 km 95 km
KKQY LIC	HILL CITY KS BLH-980508KD	270 Class C1	97.0 kW	39-01-15 99-28-12	100 km 341 dg	56 km 125 km
KJLS LIC	HAYS KS BLH-970909KE	277 Class C	100.0 kW	39-01-15 99-28-12	100 km 341 dg	56 km 125 km
KVGBFM LIC	GREAT BEND KS BLH-7258	282 Class C1	96.0 kW	38-25-54 98-46-18	41 km 44 dg	60 km 121 km
KXKU LIC	LYONS KS BLH-890914KD	291 Class C1	100.0 kW	38-15-47 97-54-08	106 km 84 dg	59 km 111 km
KBGL CP	LARNED KS BPH-960730MA	295 Class C1	100.0 kW	38-27-06 99-10-03	32 km 350 dg	57 km 111 km
KKRD LIC	WICHITA KS BLH-7824	297 Class C1	95.0 kW	37-46-37 97-31-01	146 km 107 dg	59 km 119 km

EXHIBIT #7A2
KGTR MARKET DATA

FCC Database Date: 6 1999

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CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KGTR 40 dBu
KZLS LIC	GREAT BEND KS BLH-860212KI	300 Class C1	99.0 kW	38-46-16 98-44-17	74 km 25 dg	58 km 120 km
KFRM LIC	SALINA KS BL-830914AC	550 Class D	5.0 kW DA	39-26-10 97-39-40	189 km 41 dg	60 km 148 km
KWLS LIC	PRATT KS -	1290 Class B	5.0 kW DA	37-38-34 98-40-39	69 km 147 dg	56 km 78 km
KGNO LIC	DODGE CITY KS BL-940224AC	1370 Class B	5.0 kW ND	37-45-36 100-05-53	98 km 243 dg	55 km 55 km
KAYS LIC	HAYS KS -	1400 Class C	1.0 kW ND	38-53-29 99-22-03	84 km 344 dg	56 km 34 km
KNNS LIC	LARNED KS -	1510 Class D	1.0 kW ND	38-09-54 99-06-05	0 km 0 dg	57 km 69 km
KVGB LIC	GREAT BEND KS -	1590 Class B	5.0 kW ND	38-18-50 98-47-35	32 km 58 dg	61 km 29 km

AM NIGHT OPERATION INTERFERENCE FREE CONTOURS

KVGB-AM	4.23 mv/m
KWLS	15.36 mv/m

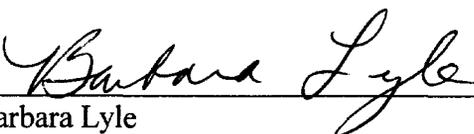
CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 29th day of July, 1999, copies of the foregoing Petition for Rulemaking were hand delivered or mailed first-class, postage prepaid, to the following:

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