

of 117.36 kilometers to WACR while 158 is required for first-adjacent channels C1 to C2. This creates a prohibited short space of 40.64 kilometers. Therefore, The Joint Petitioners propose to delete channel 280C2 at Columbus and allocate channel 280C2 at Okolona, Mississippi, as that community's first local service. Presently, two additional class C2 FM stations and 2 AMs serve Columbus. When the proposed channel 280C2 allocation coordinates are used for Okolona, it gives the required 158 kilometer spacing to channel 279C1 at Trussville. No additional sub-changes are required.

III). WKSR - channel 252A, Pulaski, Tennessee. Presently WKSR operates on channel 252A licensed to Pulaski, Tennessee. The instant PRM seeks to delete channel 252A at Pulaski and substitute channel 252C1 at Ardmore, Alabama. In order to facilitate this allotment, a sub-change of channel 252A at the licensed site of WKEA, channel 252A, Scottsboro, Alabama must occur, since channel 252C1 at Ardmore would create a short space to Scottsboro of 116.04 kilometers. Channel 278A is available for substitution at the licensed site of WKEA only if channel 279C1 is deleted at Gadsden and allotted to Trussville at the proposed reference coordinates.

A.) WKEA - channel 278A, Scottsboro, Alabama. As previously discussed, WKEA presently operates on channel 252A. However, in order for channel 252C1 at Ardmore, Alabama to be substituted for channel 252A at Pulaski, Tennessee, channel 278A must be substituted for channel 252A at the WKEA licensed site. Channel 278A is available for substitution at Scottsboro after channel 279C1 at Gadsden is deleted.

IV). WTRZ - channel 280A, McMinnville, Tennessee. Presently WTRZ operates on channel 280A licensed to McMinnville, Tennessee. The allocation of channel 279C3 at Walden is short spaced to the licensed site of WTRZ by 29.80 kilometers. Therefore, channel 280A at McMinnville and 279C3 at Walden are MX. The allotment of channel 279C3 is not MX with the allotment of channel 279C1 at Trussville, but it is MX with channel 279C1 at Gadsden. Therefore, the move from Gadsden to Trussville in order to allocate channel 279C3 to Walden, Tennessee as that community's first local service.

EXHIBITS EXPLAINED

WENN

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 288C3 at Pleasant Grove. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WENN channel 288C3 allotment coordinates, a maximum class C3 70 dBu contour, and the community boundaries of Pleasant Grove. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WENN. Exhibit E, Figure 4 is a map depicting the remaining services in the loss area after WENN is deleted at Trussville and allocated to Pleasant Grove. Exhibit E, Figure 5 is a list of the facilities included in Exhibit E, Figure 4. The numbers shown in Exhibit E, Figure 5 are the number of signals that serve the area where the number is located inside the loss area.

WRTR

Exhibit E, Figure 6 is an allocation study depicting spacing to all known FM facilities of channel 290A with a change in reference coordinates for WRTR, Moundville, Alabama. The study depicts all of the major on-channel and adjacent channel modifications required. Exhibit E, Figure 7 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WRTR channel 290A allotment coordinates, a maximum class A 70 dBu contour, and the community boundaries of Moundville. This exhibit depicts total compliance with §73.315 of the Rules. When channel 288A is deleted at Tuscaloosa, and allocated to Moundville on channel 290A, it will not leave Tuscaloosa undeserved, as 4 additional FM stations and 5 AM stations currently serve it.

Exhibit E, Figure 8 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WRTR. Exhibit E, Figure 9 is a remaining services study depicting that the substitution of channel 290A for channel 288A (WRTR), and its subsequent reallocation to Moundville creates no white or gray areas.

WKXM

Exhibit E, Figure 10 is a channel spacing study depicting spacing to all known FM facilities for channel 290A with a change in reference coordinates for WKXM, Brilliant, Alabama. The channel spacing study shows the short spacing currently experienced by WKXM with WENN when reference coordinates are used to eliminate other short spacing. However, once channel 290A is deleted at Trussville, WKXM can operate as a §73.207 facility. The study depicts all of the major on-channel and adjacent channel modifications required. Exhibit E, Figure 11 is a map generated using the programs and

techniques in the Methods section of the instant PRM. This study depicts the WKXM channel 290A reference coordinates, a maximum class A 70 dBu contour, and the community boundaries of Brilliant. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 12 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WKXM. Exhibit E, Figures 12(a) and 12(b) show the remaining services for the WKXM loss area.

WQEN

Exhibit E, Figure 13 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 279C1 at Trussville. The study depicts all of the major on-channel and adjacent channel modifications required. Exhibit E, Figure 14 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WQEN channel 279C1 allotment coordinates, a maximum class C1 70 dBu contour, and the community boundaries of Trussville. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 15 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WQEN. Exhibit E, Figure 16 is a map depicting the remaining services in the loss area after WQEN is deleted at Gadsden and allocated to Trussville. Exhibit E, Figure 17 is a list of the facilities included in Exhibit E, Figure 16. The numbers shown in Exhibit E, Figure 17 are the number of signals that serve the area where the number is located inside the loss area.

WACR

Exhibit E, Figure 18 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 280C2 at Okolona. The study

depicts all of the major on-channel and adjacent channel modifications required, and there are no subchanges. Exhibit E, Figure 19 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WACR channel 280C2 allotment coordinates, a maximum class C2 70 dBu contour, and the community boundaries of Okolona. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 20 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WACR. Exhibit E, Figure 21 is a map depicting the remaining services in the loss area after WACR is deleted at Columbus and allocated to Okolona. Exhibit E, Figure 22 is a list of the facilities included in Exhibit E, Figure 21. The numbers shown in Exhibit E, Figure 21 are the number of signals that serve the area where the number is located inside the loss area.

Even though a small region is shown only having three services, this area comprises 0.4% of the total loss area. The other 99.6% of the loss area has at least four remaining services.

WKSR

Exhibit E, Figure 23 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 252C1 at Ardmore. The study depicts all of the major on-channel and adjacent channel modifications required. Exhibit E, Figure 24 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WKSR channel 252C1 allotment coordinates, a maximum class C1 70 dBu contour, and the community boundaries of Ardmore. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 25 is a map demonstrating the gain and loss area of the respective 60 dBu contours for

WKSR. Because no loss area is created by the proposed changes to WKSR, no remaining services study is required.

WKEA

Exhibit E, Figure 26 is an allocation study depicting spacing to all known FM facilities of channel 278A for channel 252A at the licensed site of WKEA, Scottsboro, Alabama. It shows that channel 278A is available for substitution only if 279C1 at Gadsden reassigned to Trussville.

WTRZ

Exhibit E, Figure 27 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 279C3 at Walden. The study depicts all of the major on-channel and adjacent channel modifications required. It shows that channel 279C3 is available for substitution only if channel 279C1 at Gadsden is reassigned to Trussville. Exhibit E, Figure 28 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the WTRZ channel 279C3 allotment coordinates, a maximum class C3 70 dBu contour, and the community boundaries of Walden. From the proposed site, the proposed hypothetical 70 dBu contour provides city-grade to less than 50% (45.3%) of the Chattanooga urbanized area. Therefore, no Tuck showing is required for the allocation of channel 279C3 to Walden, Tennessee. However, it does demonstrate full compliance with §73.315 of the Rules. Exhibit E, Figure 29 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WTRZ. Exhibit E, Figure 30 is a map depicting the remaining services in the loss area after WTRZ is deleted at McMinnville and allocated to Walden. Exhibit E, Figure 31 is a list of the facilities included in Exhibit E, Figure 30.

The numbers shown in Exhibit E, Figure 30 are the number of signals that serve the area where the number is located inside the loss area.

The Joint Petitioners PRM Gain-Loss Area

Exhibit E, Figure 32 is a tabulation of the gain/loss area for each facility which requires an antenna location or class change. Stations that are proposed to have only their present channel substituted at their licensed site and require no class change are not included in this study. It is assumed that the service they would provide with a channel change would not deviate from their current coverage.

The study includes seven facilities that have a deviation in their coverage area proposed by the instant PRM. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. It depicts a cumulative total loss area of 18,463 square kilometers and a gain area of 36,933 square kilometers. The Joint Petitioners PRM has a net area gain of 18,470 square kilometers.

The population loss has a cumulative loss of 556,372 persons, while the population gain is 1,753,557 persons. Therefore, the net population gain of The Joint Petitioners PRM is 1,197,185 persons.

Conclusion

The Joint Petitioners' PRM has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The PRM produces a new first local at Pleasant Grove, Alabama; Okolona, Mississippi; Moundville, Alabama, Ardmore, Alabama; and Walden, Tennessee.

Statement of the Consultants

Lee S. Reynolds and Virgle Leon Strickland of Reynolds Technical Associates prepared this Proposed Rule Making. It may not be used for purposes other than submission to the Commission by the Petitioner.

It may not be reproduced in part, or in its entirety, by anyone (other than from the Commission) without the written consent of Reynolds and Strickland.

Reynolds and Strickland prepare it for the Petitioner under contractual agreement and their certification is used accordingly.

The information in this supplement is compiled from the most recent Commission and outside data. Reynolds and Strickland are not responsible for errors resulting from incorrect data, or unpublished procedures and rule changes.

For Reynolds and Strickland:

Lee S. Reynolds

August _____, 2000

2421 Presidents Drive
Suite B-23
Montgomery, AL 36116
(334) 323-3620

ENGINEERING STATEMENT
In Support of a
Petition for Rule Making
MM Docket 00-_____
The Joint Petitioners

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
Trussville, AL	290A	279C1	Delete Ch290A & add Ch 279C1 as a replacement channel. This does not constitute a non-adjacent change in community of license but is a replacement channel only.
Tuscaloosa, AL	205C1*, 214A*, 218C1*, 225C1, 239C1, 288A	205C1*, 214A*, 218C1*, 225C1, 239C1	Delete Ch 288A, substitute Ch 290A, & change community of license for WRTR.
Moundville, AL	-----	290A	Add channel 290A, first local service.
Winfield, AL	290A , 1300 kHz*	1300 kHz*	Change of ref. coordinates and city of license (sub standard to maximum class A).
Brilliant, AL	-----	290A	Change community of license for WKXM.
Gadsden, AL	204A*, 210C3*, 218C3*, 279C	204A*, 210C3*, 218C3*	Delete Ch 279C & change community of license.
Columbus, MS	213C2*, 235C2, 276C2, 280C2	213C2*, 235C2, 276C2	Delete Ch 280C2 & change community of license for WACR.
Okolona, MS	-----	280C2	Add channel 280C2, first local service.
Pleasant Grove, AL	-----	288C3	Add channel 288C3, first local service.
Pulaski, TN	252A , 1420(AM)*	1420(AM)*	Delete Ch 252A & change community of license for WKSR.
Ardmore, AL	-----	252C1	Add channel 252C1, first local service
Scottsboro, AL	252A	278A	Channel change only for WKEA.
McMinnville, TN	217A*, 280A	217A*	Delete Ch 280A & change community of license for WTRZ.
Walden, TN	-----	279C3	Add channel 279C3, first local service

* These NCE & AM stations do not appear in the Table of Allotments. They are shown only to demonstrate the remaining services.

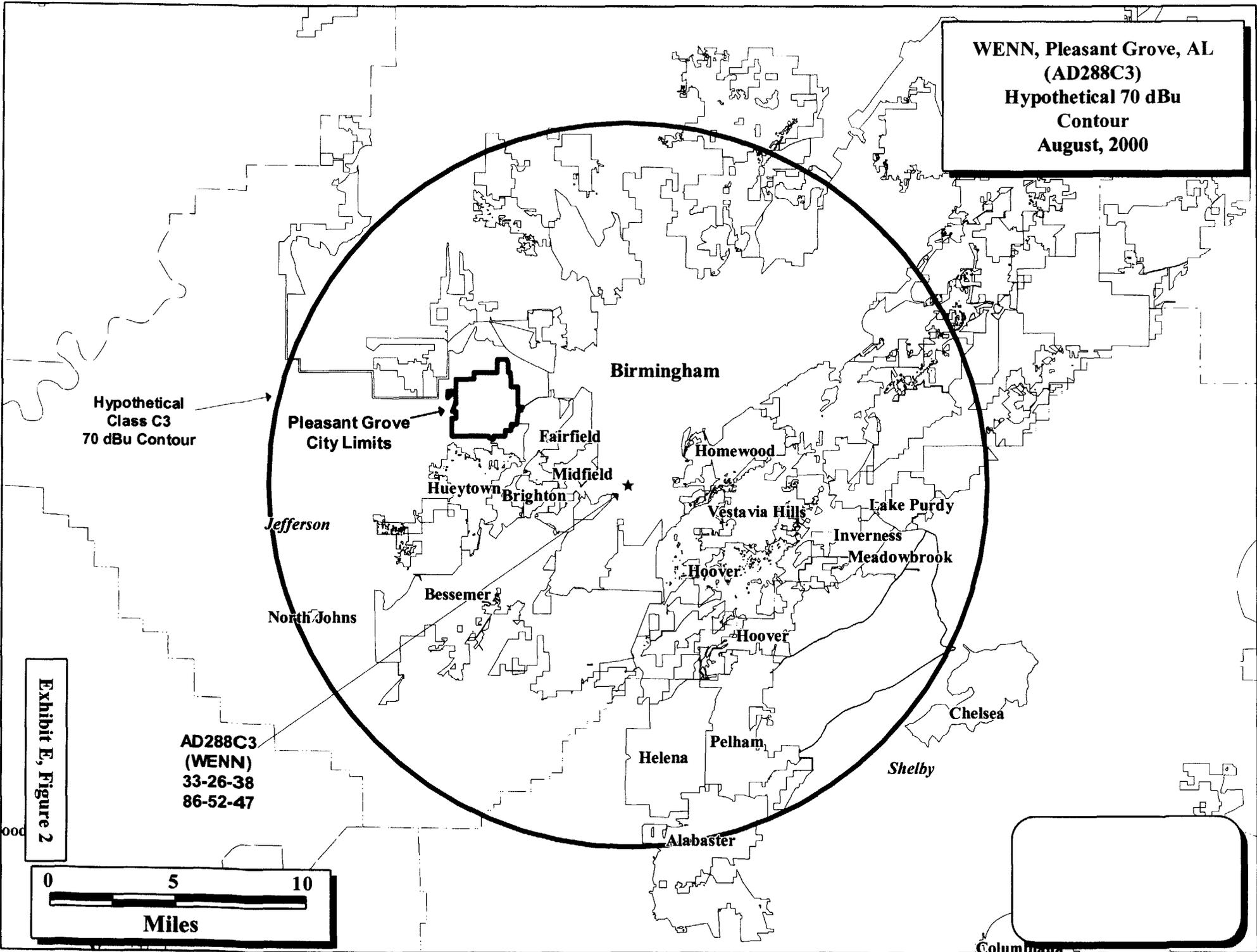
ENGINEERING STATEMENT
In Support of a
Petition for Rule Making
MM Docket 00-_____
The Joint Petitioners

Allocation Study - (WENN) Ch 288C3 Pleasant Grove, AL
[Depicting spacing & modifications required for proposed allocation]
(Using the requested Ch 288C3 (WENN) allotment coordinates as reference)

33 26 38 N.		Class C3	Search Date
86 52 47 W.		Current rules spacings	08-18-00
----- Channel 288 - 105.5 MHz -----			
Call	Ch#	City	State Bear' Dist' R'qrd Margin

Community of Pleasant Grove		AL	301.7 9.86
Reference Coordinates:			
North Latitude: 33-29-26			
West Longitude: 86-58-12			
WRTR 288A	Tuscaloosa	AL	244.6 69.60 142.0 -72.40 *
Of No Concern:			
Mutual exclusive channel swap			
Proposed between WRTR and WENN			
WENN 290A	Trussville	AL	51.8 20.90 42.0 -21.10 *
Of No Concern:			
Present licensed facility of			
WENN before proposed channel swap			
with WRTR, upgrade and change			
in WENN community of license			
WZHT 289C	Troy	AL	157.6 176.30 176.0 0.30 *
WYAI 288A	Bowdon	GA	90.1 150.04 142.0 8.04 *
WYAMFM 289A	Addison	AL	349.4 97.21 89.0 8.21 *
AVAC 286C	Albertville	AL	34.2 110.45 96.0 14.45
WQSB 286C	Albertville	AL	44.3 110.60 96.0 14.60
WVNAFM 288A	Muscle Shoals	AL	330.5 156.69 142.0 14.69
WBFZ.C 287C2	Selma	AL	195.2 134.73 117.0 17.73
WVNAFM 288A	Muscle Shoals	AL	333.5 162.95 142.0 20.95
AVAC 287C1	Bowdon	GA	98.4 171.96 144.0 27.96
AD290 290A	Moundville (WRTR)	AL	232.7 81.13 42.0 39.13
Of Note:			
Allotment of Ch 290A at Moundville			
after deletion of Ch 288A at Tuscaloosa			
for use by WRTR			
WWKZ 287C2	Aberdeen	MS	293.7 159.98 117.0 42.98
WYTMFM 288A	Fayetteville	TN	8.4 188.72 142.0 46.72
WYAI.A 287C1	Bowdon	GA	90.8 191.21 144.0 47.21

**WENN, Pleasant Grove, AL
(AD288C3)
Hypothetical 70 dBu
Contour
August, 2000**



Columbus

Pop. Inside Gain Area = 155,629
Pop. Inside Loss Area = 26,172
Area Inside Gain Area = 2,729 sq km
Area Inside Loss Area = 444 sq km

WENN, Pleasant Grove, AL
(AD288C3)
Gain/Loss Study
August, 2000

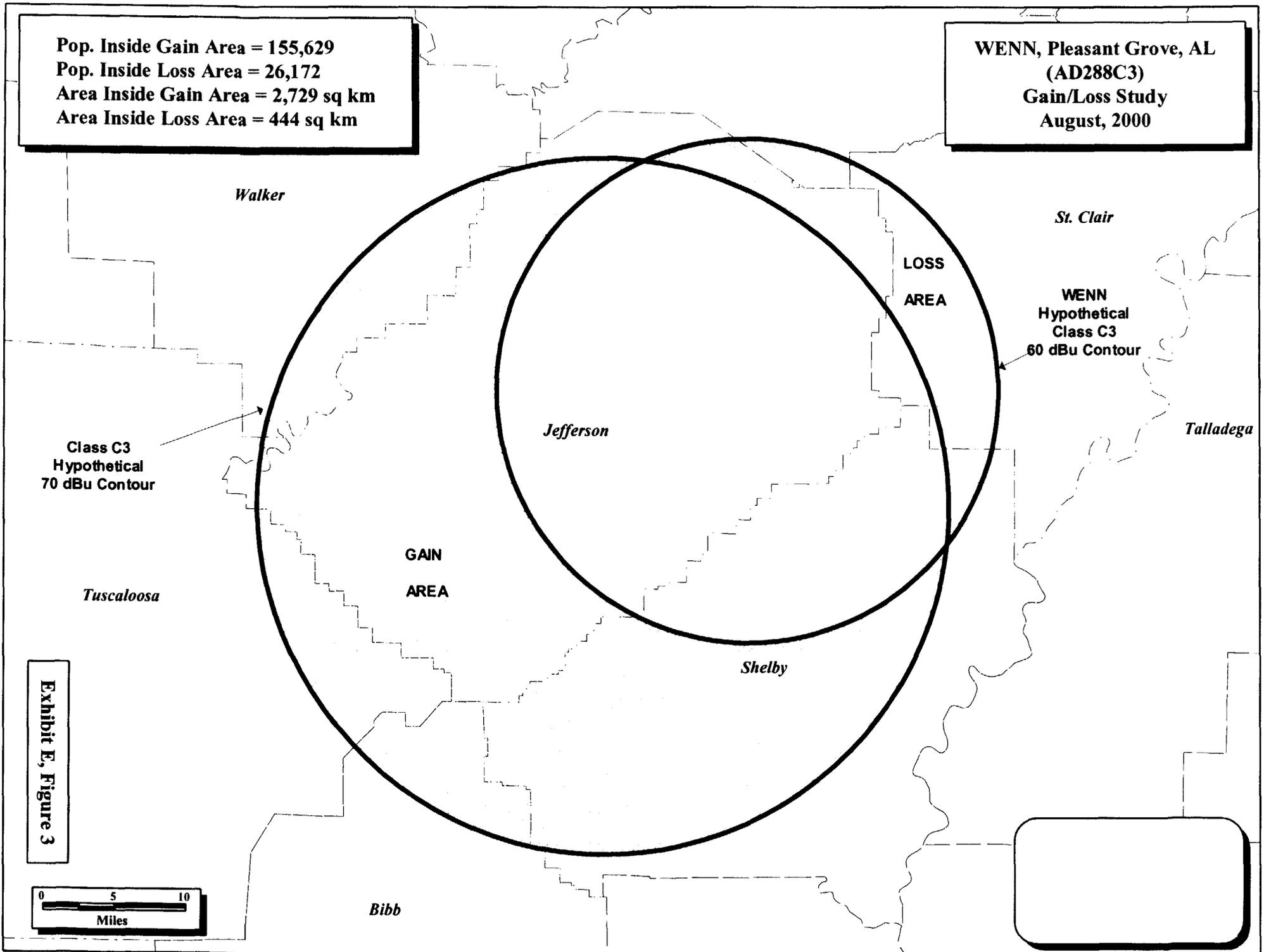


Exhibit E, Figure 3

0 5 10
Miles

**WENN, Pleasant Grove, AL
(AD288C3)
Remaining Services Study
August, 2000**

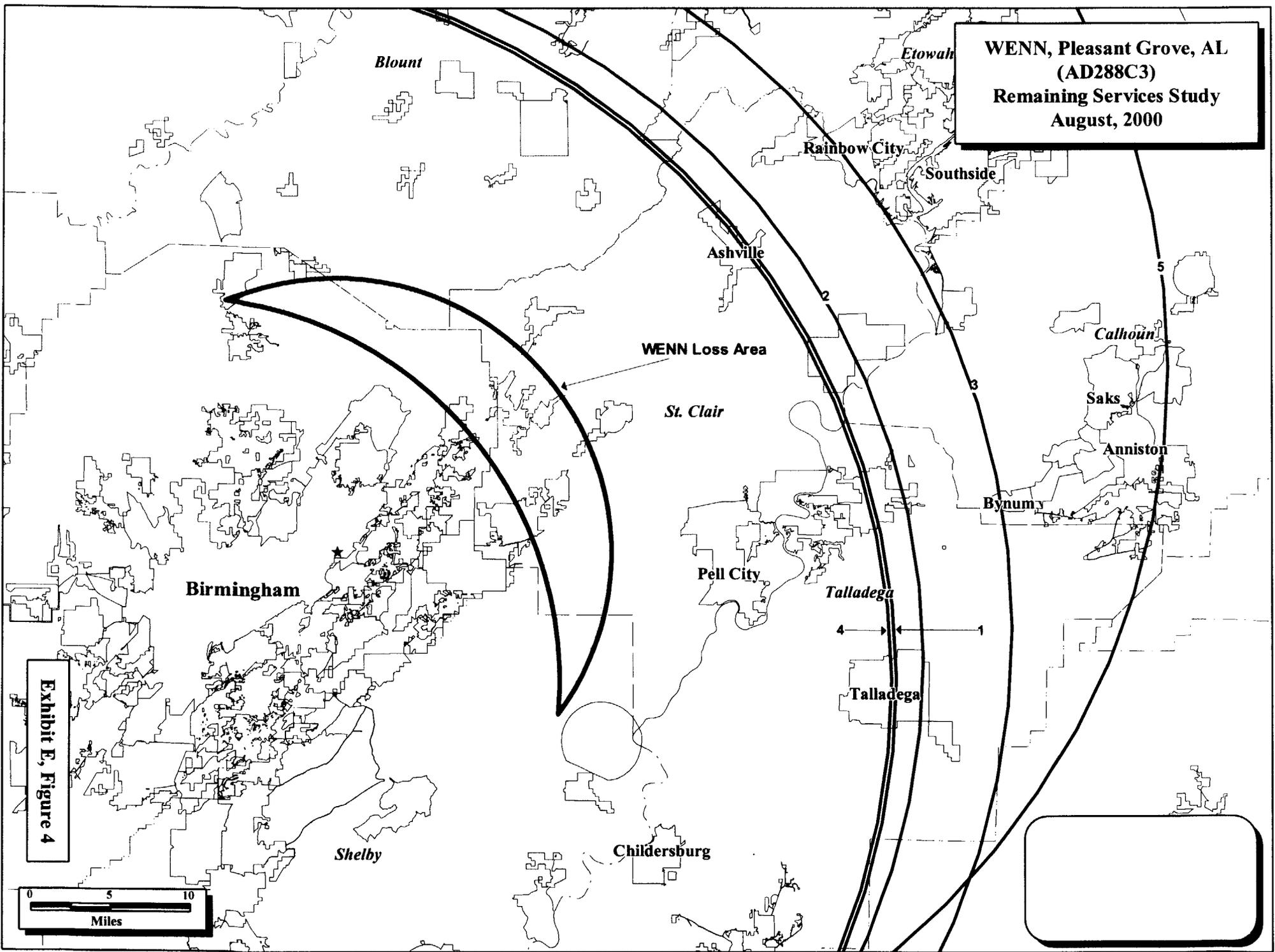


Exhibit E, Figure 4

0 5 10
Miles

ENGINEERING STATEMENT
In Support of a
Petition for Rule Making
MM Docket 00-_____
The Joint Petitioners

List of Remaining Services - (WENN) Ch 288C3 Pleasant Grove, AL

Number	Call Letters	Channel	City	State
1	WMJJ	243C	Birmingham	Alabama
2	WZRR	258C	Birmingham	Alabama
3	WYSF	233C	Birmingham	Alabama
4	WDJC	229C	Birmingham	Alabama
5	WRAX	299C	Birmingham	Alabama

**WRTR, Moundville, AL
(AD290A)
Hypothetical 70 dBu
August, 2000**

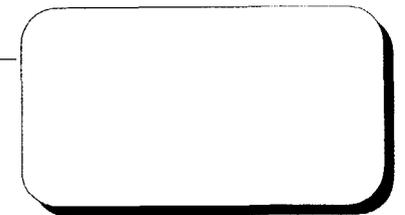
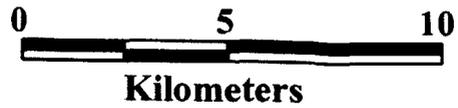
**AD290A
Hypothetical
70 dBu Contour**

**Moundville
City Limits**

**AD290A
33-00-03
87-34-20**

Exhibit E, Figure 7

Akron



Pop. Inside Gain Area = 6,365
Pop. Inside Loss Area = 30,941
Area Inside Gain Area = 1,078 sq km
Area Inside Loss Area = 1,078 sq km

WRTR, Moundville, AL
(AD290A)
Gain/Loss Study
August, 2000

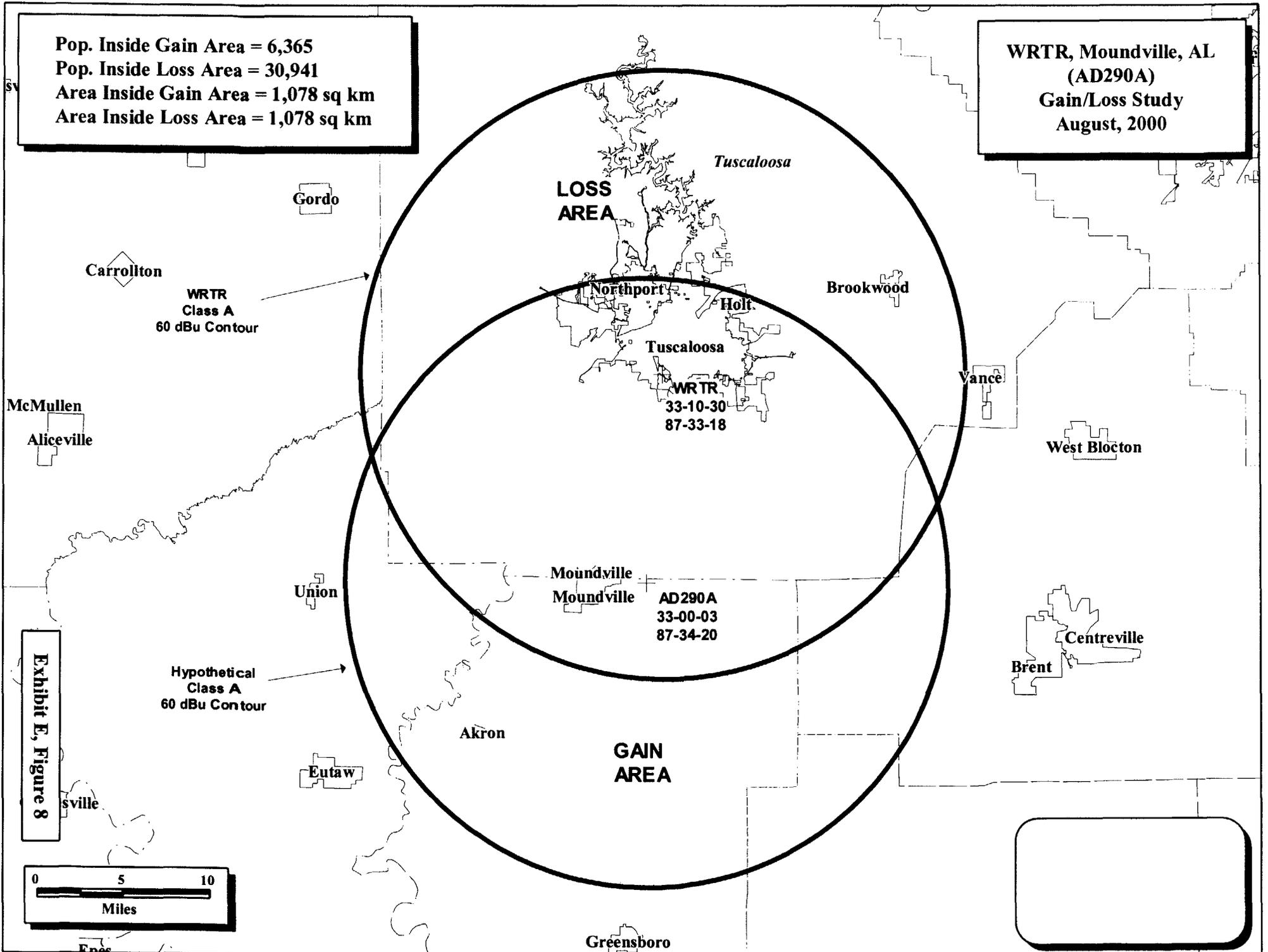


Exhibit E, Figure 8

0 5 10
Miles

Stations Included in Remaining Services Study

- 1 - WTID, channel 269C2, Reform, Alabama
- 2 - WTXI, channel 251C1, Fayette, Alabama
- 3 - WZBQ, channel 231C, Carrollton, Alabama
- 4 - WUAL, channel 218C1, Tuscaloosa, Alabama
- 5 - WTUG, channel 225C1, Tuscaloosa, Alabama
- 6 - WMJJ, channel 243C, Birmingham, Alabama
- 7 - WBHJ, channel 239C1, Tuscaloosa, Alabama

**WRTR, Moundville, AL
(AD290A)
Remaining Services Study
August, 2000**

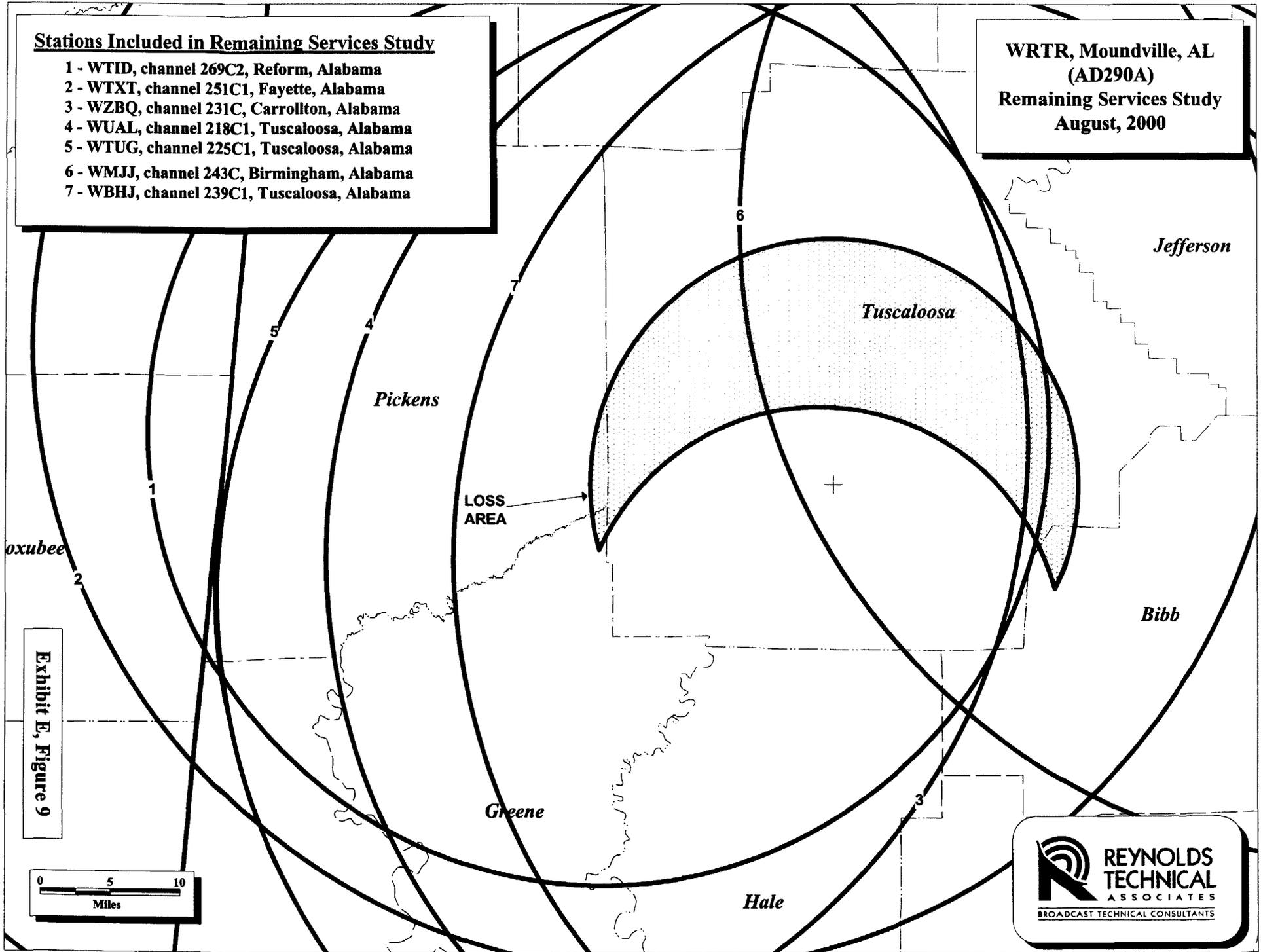
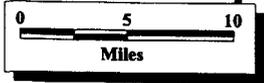


Exhibit E, Figure 9



ENGINEERING STATEMENT
In Support of a
Petition for Rule Making
MM Docket 00-_____
The Joint Petitioners

Allocation Study - (WKXM) Ch 290A Brilliant, AL
 [Depicting spacing & modifications required for proposed reference change]
 (Using the requested Ch 290A (WKXM) modified coordinates as reference)

34 01 25 N.			Class A				Search Date
87 46 17 W.			Current rules spacings				08-17-00
-----			Channel 290 -105.9 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

Community of Brilliant			AL	82.9	1.24		
Reference Coordinates:							
North latitude: 34-01-30							
West Longitude: 87-45-29							
WKXMFM 290A	Winfield		AL	287.1	2.93	115.0	-112.07 *
Of No Concern:							
Present licensed facility of WKXM							
WENN 290A	Trussville		AL	117.4	111.48	115.0	-3.52 *
Of Concern:							
Substitution of Ch 288C3 for Ch 290A							
and community of license change proposed.							
See below.							
WYAMFM 289A	Addison		AL	64.1	71.55	72.0	-0.45 *
WGKX 290C	Memphis		TN	303.7	226.15	226.0	0.15 *
WWKZ 287C2	Aberdeen		MS	270.1	63.60	55.0	8.60 *
WMXU 291C2	Starkville		MS	225.4	115.35	106.0	9.35 *
WNRQ 290C	Nashville		TN	20.7	238.55	226.0	12.55
WTAKFM 291C3	Hartselle		AL	64.9	114.76	89.0	25.76
WBTGFM 292C3	Sheffield		AL	358.2	74.27	42.0	32.27
WVNAFM 288A	Muscle Shoals		AL	4.1	72.25	31.0	41.25
WFFN 237A	Cordova		AL	118.1	59.75	10.0	49.75
WVNAFM 288A	Muscle Shoals		AL	6.6	82.01	31.0	51.01
WAFM 237A	Amory		MS	265.4	66.73	10.0	56.73
WENN.P 288C3	Pleasant Grove		AL	127.9	104.70	42.0	62.70
Of Note:							
Allotment of Ch 288C3 for Ch 290A and							
Change in community of license proposed							

**WKXM, Brilliant, AL
Channel 290A
Hypothetical 70 dBu
Contour
August, 2000**

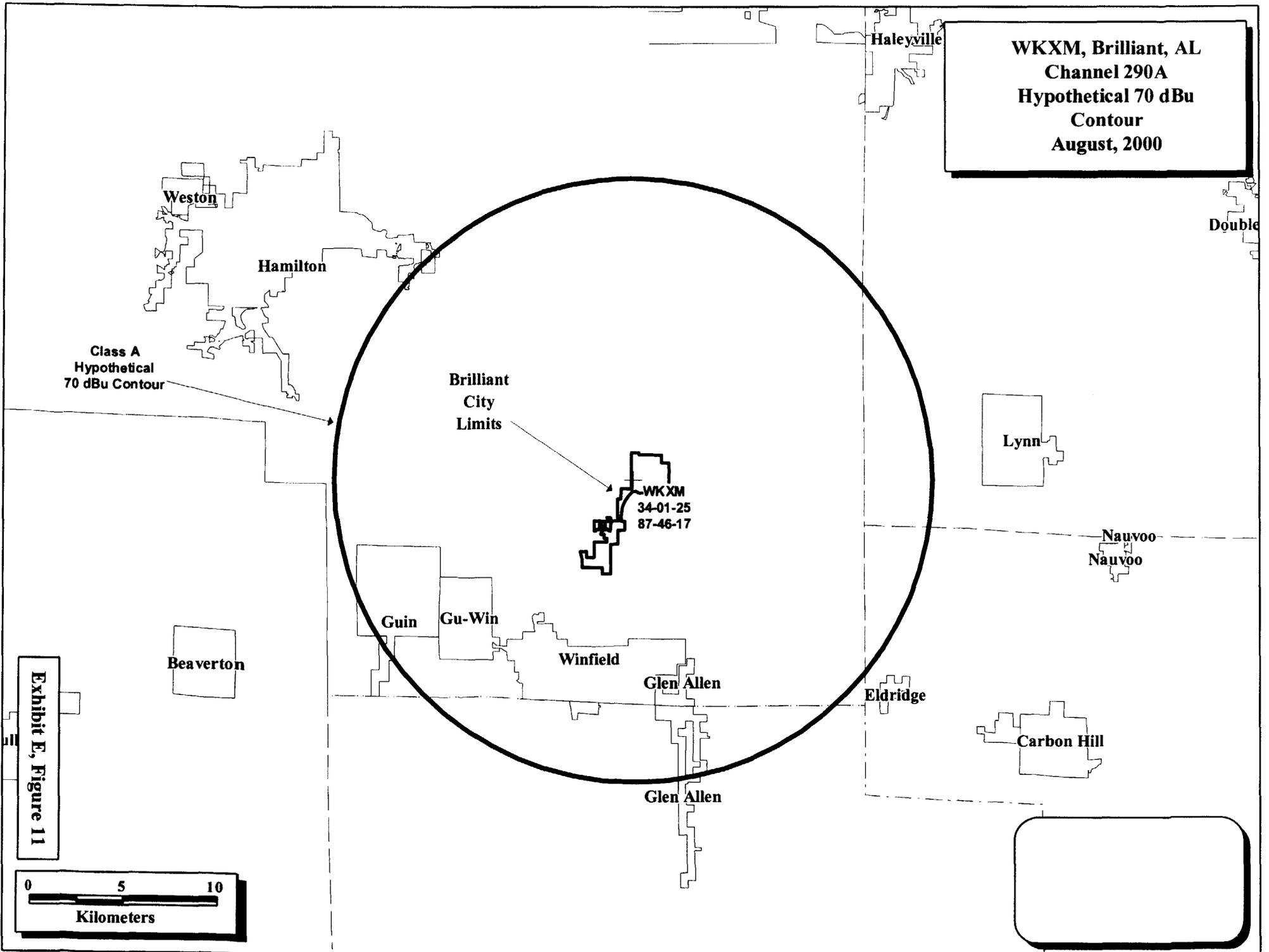
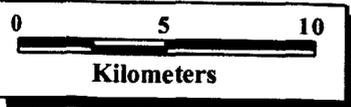
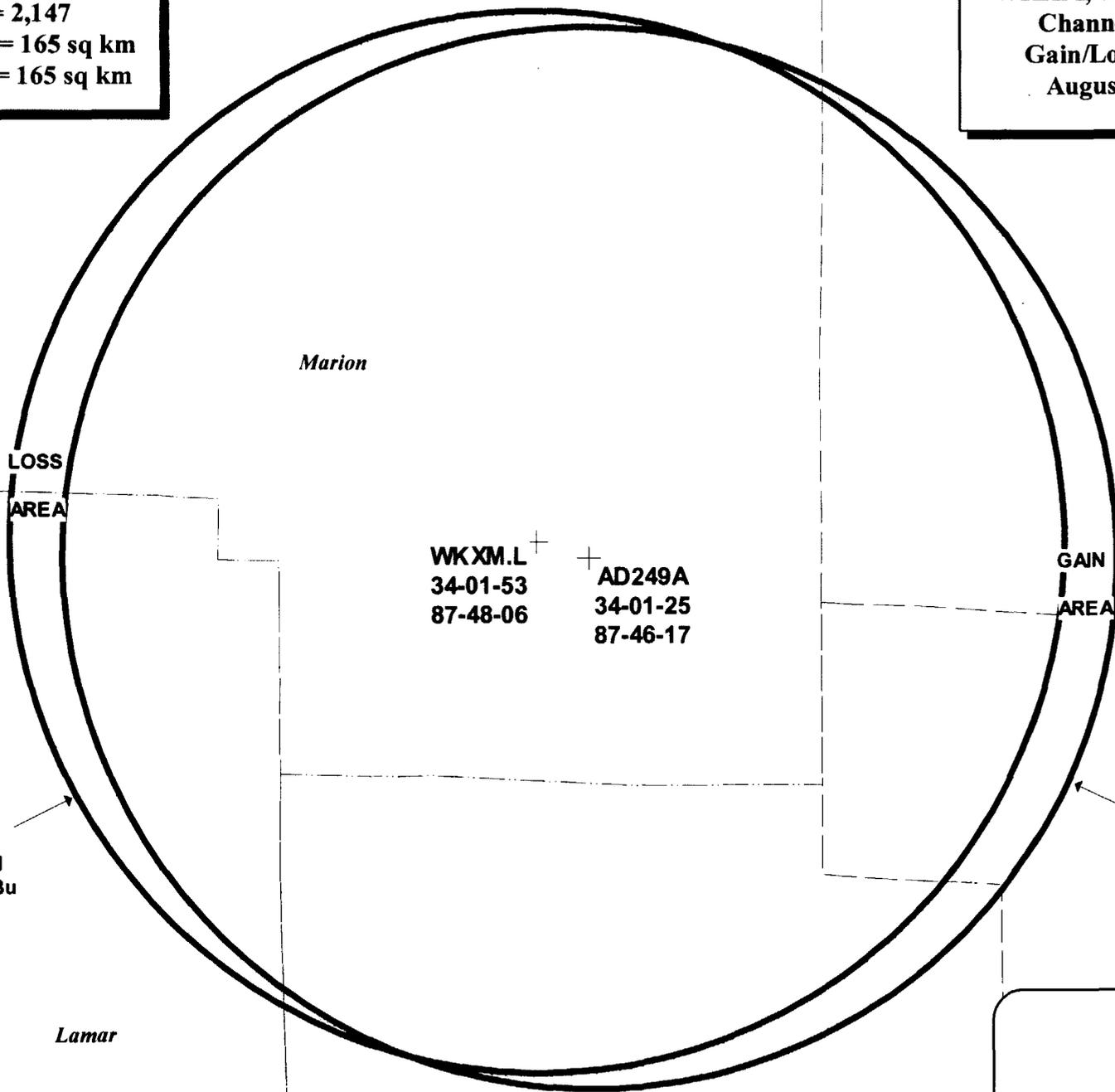


Exhibit E, Figure 11



Pop. Inside Gain Area = 3,069
Pop. Inside Loss Area = 2,147
Area Inside Gain Area = 165 sq km
Area Inside Loss Area = 165 sq km

WKXM, Brilliant, AL
Channel 290A
Gain/Loss Study
August, 2000



Winston

Marion

LOSS
AREA

GAIN
AREA

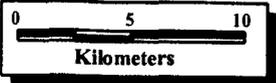
WKXM.L + AD249A
34-01-53 34-01-25
87-48-06 87-46-17

WKXM.L
Hypothetical
Class A 60 dBu

AD249A
Hypothetical
Class A 60 dBu

Lamar

Exhibit E, Figure 12



**WKXM, Brilliant, AL
Channel 290A
Remaining Services Study
August, 2000**

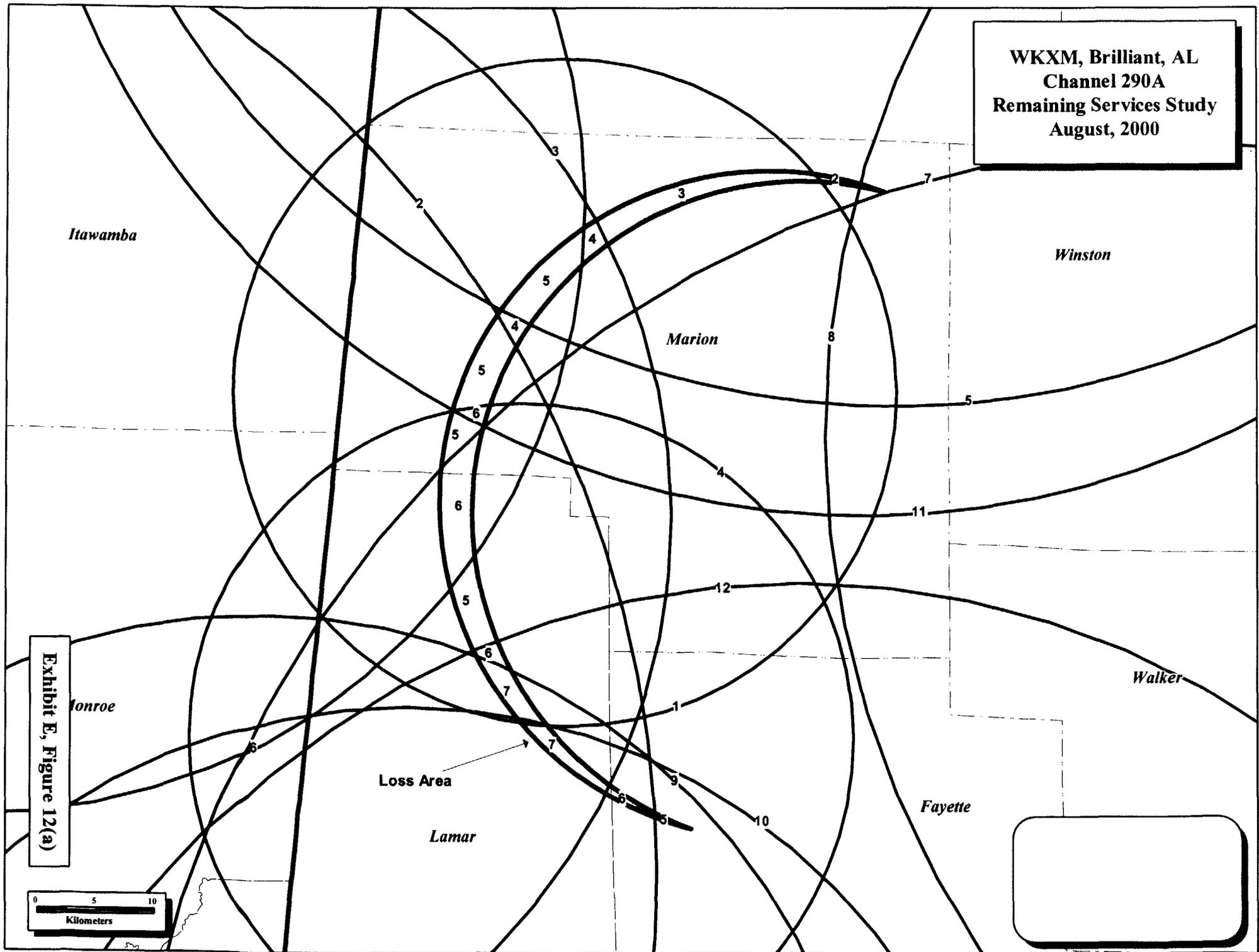


Exhibit E, Figure 12(a)

0 5 10
Kilometers

**ENGINEERING STATEMENT
In Support of a
Petition For Rule Making**

The Joint Petitioners

WKXM List of Stations in Remaining Service Study

Number	Call Letters	Channel	City	State
1	WERH	221A	Hamilton	AL
2	WSYE	227C	Houston	MS
3	WWKZ	287C2	Aberdeen	MS
4	WJEC	293A	Vernon	AL
5	WLAY	262C1	Tuscumbia	AL
6	WFTA	270C2	Fulton	MS
7	WDXB	273C	Jasper	AL
8	WRRS	266C	Cullman	AL
9	WKOR	235C2	Columbus	MS
10	WACR	280C2	Columbus	MS
11	WQLT	297C1	Florence	AL
12	WTXT	251C1	Fayette	AL

