

original PRM which proposed modifying WRTR from channel 288A at Tuscaloosa to channel 290A at Moundville. One additional change is required as well as one subchange.

1). WKXM - channel 249A, Winfield, Alabama. Presently WKXM operates on channel 290A licensed to Winfield, Alabama with reference coordinates that short space the allotment of channel 290C3 at Brookwood by 43.95 kilometers. The instant Comments and Amended Proposal seeks to eliminate this short spacing by deleting channel 290A at Winfield and substituting channel 249A with an antenna site change. In order to substitute channel 249A for channel 290A at Winfield, channel 249A must be deleted at WKGL at Russellville.

a) WKGL - channel 278A, Russellville, Alabama. Presently WKGL operates on channel 249A licensed to Russellville, Alabama. The substitution of 249A for channel 290A at Winfield creates a short spacing to WKGL of 48.39 kilometers. To alleviate this short spacing, the instant Comments and Amended Proposal calls for the substitution of channel 278A at its existing site. The substitution of channel 278A for channel 249A at the licensed site of WKGL is not in conflict with the allotment of channel 279C1 at Trussville. However, it should be noted that the substitution of channel 278A at Russellville can be made only after channel 279C is deleted at Gadsden. This substitution gives a direct allocations relationship between the allotment of channel 279C1 at Trussville with the scenario proposed in the instant Comments and Amended Proposal.

B). WZHT – channel 289C0, Troy, Alabama. Presently WZHT operates on channel 289C licensed to Troy, Alabama. The instant Comments and Amended Proposal seeks to reclassify WZHT from a class C to a class C0, on its existing channel 289C. The allotment of channel 288C2 to Hoover creates a short space to WZHT Troy on channel 289C of 20.92 kilometers. This short space is eliminated when channel 289C is deleted and channel 289C0 is allocated to Troy at a new set of reference coordinates. No additional spectrum changes are required.

### **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 288C2 at Hoover. 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 Comments and Amended Proposal. This study depicts the WENN channel 288C2 allotment coordinates, a maximum class C2 70 dBu contour, and the community boundaries of Hoover. 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. Because no loss area is created, no remaining services study is needed.

#### **WRTR**

Exhibit E, Figure 4 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 290C3 at Brookwood. The study depicts all of the major on-channel and adjacent channel modifications. Exhibit E, Figure 5 is a map

generated using the programs and techniques in the Methods section of the instant Comments and Amended Proposal. This study depicts the WRTR channel 290C3 allotment coordinates, a maximum class C3 70 dBu contour, and the community boundaries of Brookwood. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 6 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WRTR. Exhibit E, Figure 7 is a map depicting the remaining services in the loss area after WRTR is deleted at Tuscaloosa and allocated to Brookwood.

#### WKXM

Exhibit E, Figure 8 is an allocation study depicting spacing to all known FM facilities of channel 249A for channel 290A with a change in reference coordinates for WKXM, Winfield, Alabama. The study depicts all of the major on-channel and adjacent channel modifications required, including one subchange. Exhibit E, Figure 9 is a map generated using the programs and techniques in the Methods section of the instant Comments and Amended Proposal. This study depicts the WKXM channel 249A allotment coordinates, a maximum class A 70 dBu contour, and the community boundaries of Winfield. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 10 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WKXM.

#### WKGL

Exhibit E, Figure 11 is an allocation study depicting spacing to all known FM facilities of the substitution of channel 278A at Russellville for channel 249A at the licensed site of WKGL. It shows that channel 278A is available for substitution only if channel 279C at Gadsden is deleted and channel 279C1 is reassigned to Trussville.

#### WZHT

Exhibit E, Figure 12 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 289C0 at Troy. The study depicts the required spacing of channel 288C2 at Hoover. Exhibit E, Figure 13 is a map generated using the programs and techniques in the Methods section of the instant Comments and Amended Proposal. This study depicts the WZHT channel 289C0 allotment coordinates, a maximum class C2 70 dBu contour, and the community boundaries of Troy. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 14 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WZHT.

#### **The Joint Petitioners Comments and Amended Proposal Gain-Loss Area**

Exhibit E, Figure 15 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 four facilities that have a deviation in their coverage area proposed by the instant Comments and Amended Proposal. 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 21,583 square kilometers and a gain area of 42,565 square kilometers. The Joint Petitioners Comments and Amended Proposal has a net area gain of 20,982 square kilometers.

The population loss has a cumulative loss of 583,724 persons, while the population gain is 1,836,594 persons. Therefore, the net population gain of The Joint Petitioners Comments and Amended Proposal is 1,252,870 persons.

**Conclusion**

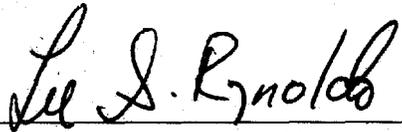
The Joint Petitioners' Comments and Amended Proposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The Comments and Amended Proposal produces a new first local at Hoover, Alabama and Brookwood, Alabama.

**Statement of the Consultants**

The instant Comments and Amended Proposal was prepared for The Joint Petitioners by Reynolds Technical Associates. It is based on the most current data supplied by the Commission. Reynolds Technical Associates is not responsible for errors occurring from incorrect data supplied by the Commission's FM database.

It is prepared for the Joint Petitioners under contractual agreement, and it is to be used for submission to the Commission only. Unauthorized reproduction, other than through the Commission filing, is prohibited.

For Reynolds Technical Associates

A handwritten signature in black ink, reading "Lee S. Reynolds", is written over a horizontal line.

Lee S. Reynolds

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334.323.3620

ENGINEERING STATEMENT  
 In Support of a  
**Comments and Amended Proposal**  
 MM Docket 01-62, RM-10053  
 The Joint Petitioners

Summary of Channel Assignments appearing in initial petition for rule making  
 (Also see Table II for counterproposal summary of channel assignments)  
 (Depicting all communities, channels, and modifications proposed in initial petition for rule making )

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
Trussville, AL	<b>290A</b>	<b>279C1</b>	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, <b>288A</b>	205C1*, 214A*, 218C1*, 225C1, 239C1	Delete Ch 288A, substitute Ch 290A, & change community of license for WRTR.
Moundville, AL	-----	<b>290A</b>	Add channel 290A, first local service.
Winfield, AL	<b>290A</b> , 1300 kHz*	1300 kHz*	Change of ref. coordinates and city of license (sub standard to maximum class A).
Brilliant, AL	-----	<b>290A</b>	Change community of license for WKXM.
Gadsden, AL	204A*, 210C3*, 218C3*, <b>279C</b>	204A*, 210C3*, 218C3*	Delete Ch 279C & change community of license.
Columbus, MS	213C2*, 235C2, 276C2, <b>280C2</b>	213C2*, 235C2, 276C2	Delete Ch 280C2 & change community of license for WACR.
Okolona, MS	-----	<b>280C2</b>	Add channel 280C2, first local service.
Pleasant Grove, AL	-----	<b>288C3</b>	Add channel 288C3, first local service.
Pulaski, TN	<b>252A</b> , 1420(AM)*	1420(AM)*	Delete Ch 252A & change community of license for WKSR.
Ardmore, AL	-----	<b>252C1</b>	Add channel 252C1, first local service
Scottsboro, AL	<b>252A</b>	<b>278A</b>	Channel change only for WKEA.
McMinnville, TN	217A*, <b>280A</b>	217A*	Delete Ch 280A & change community of license for WTRZ.
Walden, TN	-----	<b>279C3</b>	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.

Table I

ENGINEERING STATEMENT  
 In Support of a  
**Comments and Amended Proposal**  
 MM Docket 01-62, RM-10053  
 The Joint Petitioners

Summary of Channel Assignments in Instant Counterproposal  
 (Depicting all communities, channels, and modifications)

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS (changes to NPRM shown as bold italic)</u>
Trussville, AL Change from NPRM establishes a direct allotment relationship since this substitution is required for the substitution of Ch 278A at Russellville, AL	<b>290A</b>	<b>279C1</b>	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. <b><i>It is also necessary to create a substitute channel (278A) at Russellville, AL</i></b>
Tuscaloosa, AL No change from NPRM	205C1*, 214A*, 218C1*, 225C1, 239C1, <b>288A</b>	205C1*, 214A*, 218C1*, 225C1, 239C1	Delete Ch 288A, substitute Ch 290A, & change community of license for WRTR.
Brookwood, AL Change from NPRM. Ch 290C3 at Brookwood in lieu of Ch 290A at Moundville, AL	-----	<b>290C3</b>	<b><i>Add channel 290C3, first local service for use by WRTR after Ch 288A is deleted at Tuscaloosa.</i></b>
Winfield, AL Change from NPRM with WKXM remaining at Winfield on Ch 249A	<b>290A *</b>	<b>249A *</b>	<b><i>Change of ref. Coordinates and substitution of Ch 249A for Ch 290A with city of license remaining at Winfield. (sub standard to maximum class A).</i></b>
Gadsden, AL No change from NPRM	204A*, 210C3*, 218C3*, <b>279C</b>	204A*, 210C3*, 218C3*	Delete Ch 279C & change community of license.
Columbus, MS No change from NPRM	213C2*, 235C2, 276C2, <b>280C2</b>	213C2*, 235C2, 276C2	Delete Ch 280C2 & change community of license for WACR.
Okolona, MS No change from NPRM	-----	<b>280C2</b>	Add channel 280C2, first local service.
<b>Hoover, AL</b> Change from NPRM with WENN licensed to Hoover on Ch 288C2 in lieu of Ch 288C3 at Pleasant Grove	-----	<b>288C3</b>	<b><i>Add channel 288C2, first local service.</i></b>
<b>Tuscaloosa, AL</b>	<b>See WRTR modification above</b>		
<b>Troy, AL</b> Not in NPRM	<b>289C</b>	<b>289C0</b>	<b><i>Modify reference classification and reference coordinates (antenna site).</i></b>
<b>Ashburn, GA</b> Not in NPRM	<b>289A</b>	<b>289A</b>	<b><i>Modify reference coordinates (antenna site) only.</i></b>
<b>Headland, AL</b> Not in NPRM	<b>287C3</b>	<b>287C3</b>	<b><i>Modify reference coordinates (antenna site) only.</i></b>

Continued on the next page

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS (changes to NPRM shown as bold italic)</u>
Ardmore, AL Same as NPRM	-----	<b><i>252C1</i></b>	Add channel 252C1, first local service
Scottsboro, AL Same as NPRM	<b>252A</b>	<b>278A</b>	Channel change only for WKEA.
McMinnville, TN Same as NPRM	217A*, <b>280A</b>	217A*	Delete Ch 280A & change community of license for WTRZ.
Walden, TN Same as NPRM	-----	<b><i>279C3</i></b>	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.

Table II

**Engineering Statement  
In Support of  
Comments and Amended Proposal  
MM Docket 01-62, RM-10053  
The Joint Petitioners**

**Allocation Study – Ch 288C2 Hoover, AL (WENN)**  
[Depicting spectrum changes required to allot Ch 288C2]  
(Using proposed allotment coordinates as reference)

REFERENCE							DISPLAY DATES
33 22 41 N.	Class C2						DATA 04-20-01
86 48 35 W.	Current rules spacings						SEARCH 04-23-01
----- Channel 288 -105.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Hoover</b>			<b>AL</b>	<b>357.5</b>	<b>2.99</b>		
Reference Coordinates:							
North Latitude: 33-24-18							
West Longitude: 86-50-40							
<b>RADD</b>	<b>288C3</b>	<b>Pleasant Grove</b>	<b>AL</b>	<b>318.3</b>	<b>9.78</b>	<b>177.0</b>	<b>-167.22 *</b>
Of No Concern:							
Allotment proposed in initial							
Joint Petitioners PRM.							
<b>RDEL</b>	<b>288A</b>	<b>Tuscaloosa</b>	<b>AL</b>	<b>265.1</b>	<b>57.72</b>	<b>166.0</b>	<b>-108.28 *</b>
<b>WRTR</b>	<b>288A</b>	<b>Tuscaloosa</b>	<b>AL</b>	<b>252.0</b>	<b>72.99</b>	<b>166.0</b>	<b>-93.01 *</b>
Of Concern:							
Substitution of MX channel 290C3,							
antenna site change and							
change in community of license proposed.							
See WRTR.P at Brookwood below.							
<b>RDEL</b>	<b>290A</b>	<b>Trussville</b>	<b>AL</b>	<b>26.1</b>	<b>22.54</b>	<b>55.0</b>	<b>-32.46 *</b>
<b>WENN</b>	<b>290A</b>	<b>Trussville</b>	<b>AL</b>	<b>26.1</b>	<b>22.54</b>	<b>55.0</b>	<b>-32.46 *</b>
Of No Concern:							
Licensed facility of WENN before							
changes proposed in instant counterproposal.							
<b>WYAI</b>	<b>288A</b>	<b>Bowdon</b>	<b>GA</b>	<b>87.2</b>	<b>143.76</b>	<b>166.0</b>	<b>-22.24 *</b>
Of No Concern:							
Channel 288A deleted and channel							
287C1 allotted previously.							
See WYAI Ch 287C1 below.							
<b>WZHT</b>	<b>289C</b>	<b>Troy</b>	<b>AL</b>	<b>158.7</b>	<b>167.08</b>	<b>188.0</b>	<b>-20.92 *</b>
Of Concern:							
Change to class CO and							
Change in reference coordinates proposed.							
See WZHT below.							
<b>WBFZ.C</b>	<b>287C2</b>	<b>Selma</b>	<b>AL</b>	<b>198.9</b>	<b>129.67</b>	<b>130.0</b>	<b>-0.33 *</b>
<b>WYAMFM</b>	<b>289A</b>	<b>Addison</b>	<b>AL</b>	<b>346.7</b>	<b>105.70</b>	<b>106.0</b>	<b>-0.30 *</b>
<b>WZHT.P</b>	<b>289C0</b>	<b>Troy</b>	<b>AL</b>	<b>162.4</b>	<b>175.65</b>	<b>176.0</b>	<b>-0.35 *</b>
Of Note:							
Class change and reference coordinates							
Proposed in instant counterproposal at;							
NL: 31-52-03, WL: 86-14-58							

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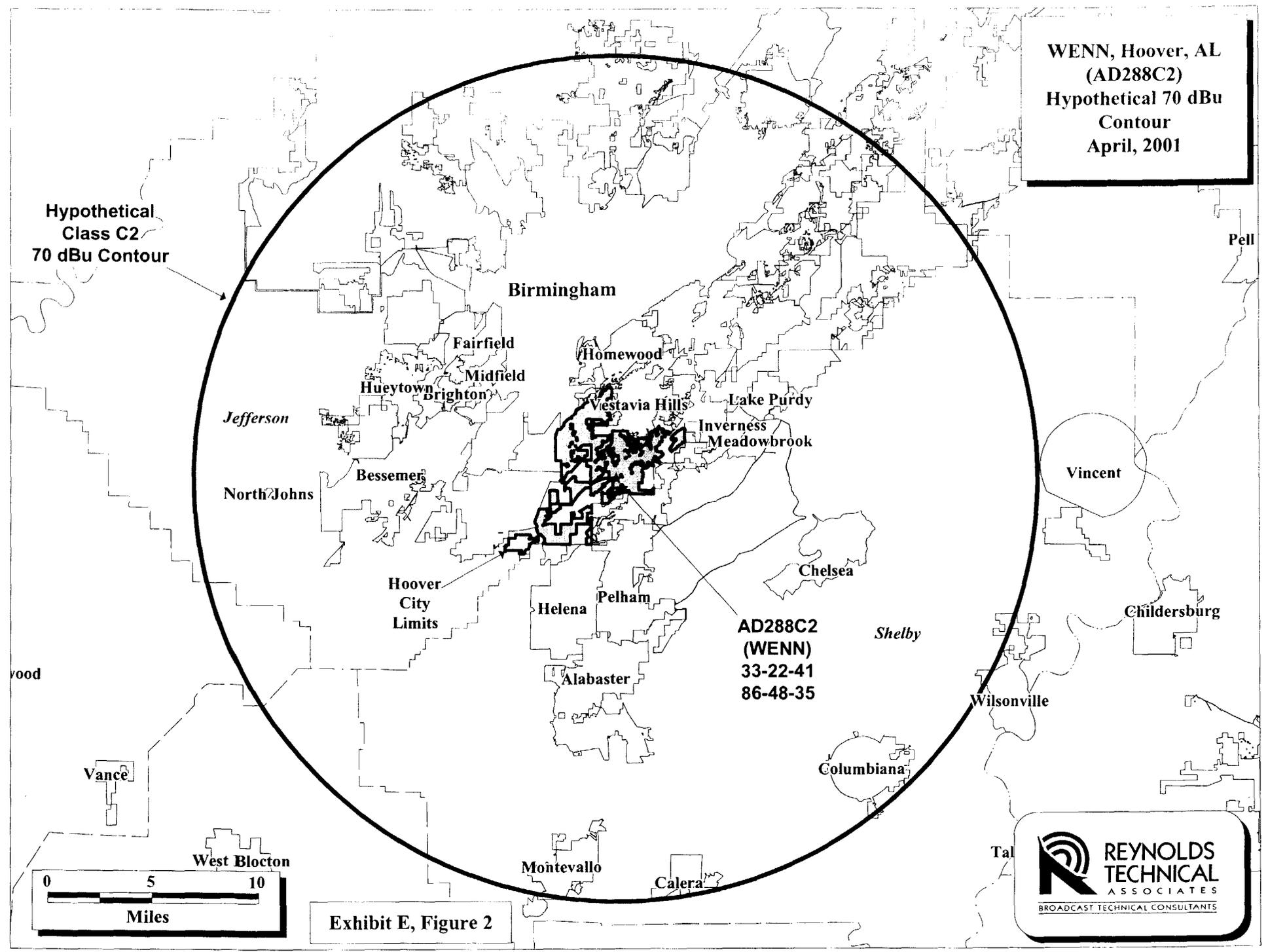
**Allocation Study – Ch 288C2 Hoover, AL (WENN)**  
 [Depicting spectrum changes required to allot Ch 288C2]  
 (Using proposed allotment coordinates as reference)

REFERENCE							DISPLAY DATES
33 22 41 N.	Class C2						DATA 04-20-01
86 48 35 W.	Current rules spacings						SEARCH 04-23-01
----- Channel 288 -105.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
WLAYFM	288A	Muscle Shoals	AL	329.8	166.26	166.0	0.26 *
<b>WRTR.P</b>	<b>290C3</b>	<b>Brookwood</b>	<b>AL</b>	<b>251.6</b>	<b>59.04</b>	<b>56.0</b>	<b>3.04 *</b>
	Of Note: New allotment at Brookwood, channel and site change at; NL: 33-12-36, WL: 87-24-40						
WLAYFM	288A	Muscle Shoals	AL	332.6	172.40	166.0	6.40 *
<b>WYAI.C</b>	<b>287C1</b>	<b>Bowdon</b>	<b>GA</b>	<b>88.8</b>	<b>183.84</b>	<b>158.0</b>	<b>25.84</b>
	Of Note: Allotment reference and channel Made in one-step application at; NL: 33-24-43, WL: 84-50-43						
<b>RADD</b>	<b>290A</b>	<b>Moundville</b>	<b>AL</b>	<b>239.5</b>	<b>82.50</b>	<b>55.0</b>	<b>27.50</b>
	Of Note: Previously proposed allotment for WRTR in NPRM. Not applicable in instant Counterproposal.						
WYTMFM	288A	Fayetteville	TN	6.2	195.15	166.0	29.15
WWKZ	287C2	Aberdeen	MS	295.1	168.96	130.0	38.96

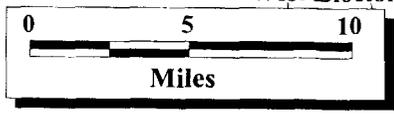


**WENN, Hoover, AL  
(AD288C2)  
Hypothetical 70 dBu  
Contour  
April, 2001**

**Hypothetical  
Class C2  
70 dBu Contour**



**AD288C2  
(WENN)  
33-22-41  
86-48-35**



**Exhibit E, Figure 2**



Pop. Inside Gain Area = 234,523  
Pop. Inside Loss Area = 0  
Area Inside Gain Area = 6,040 sq km  
Area Inside Loss Area = 0 sq km

WENN, Hoover, AL  
(AD288C2)  
Gain/Loss Study  
April, 2001

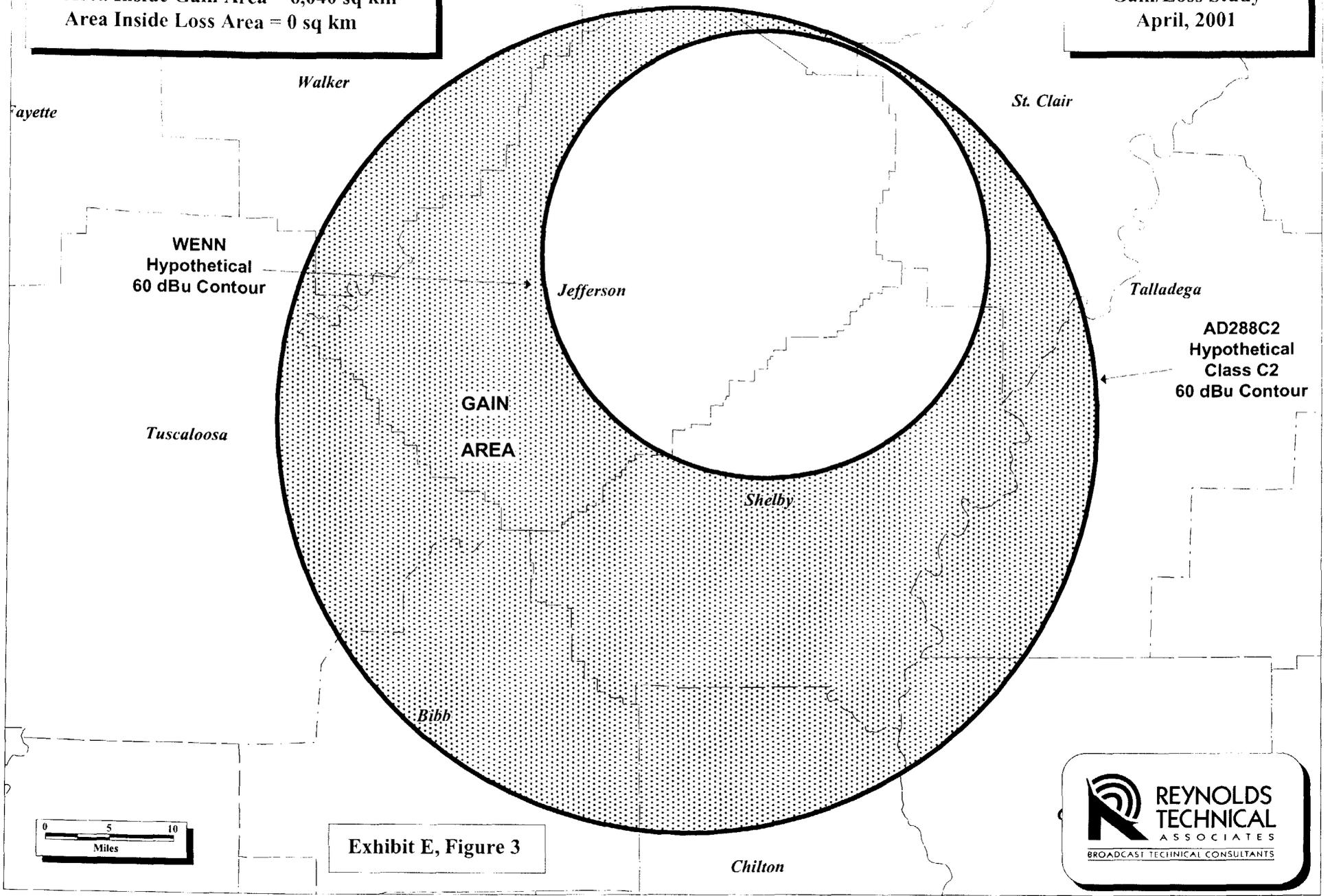


Exhibit E, Figure 3



**Engineering Statement  
In Support of a  
Comments and Amended Proposal  
MM Docket 01-62, RM-10053  
The Joint Petitioners**

**Allocation Study – Ch 290C3 Brookwood, AL (WRTR)**

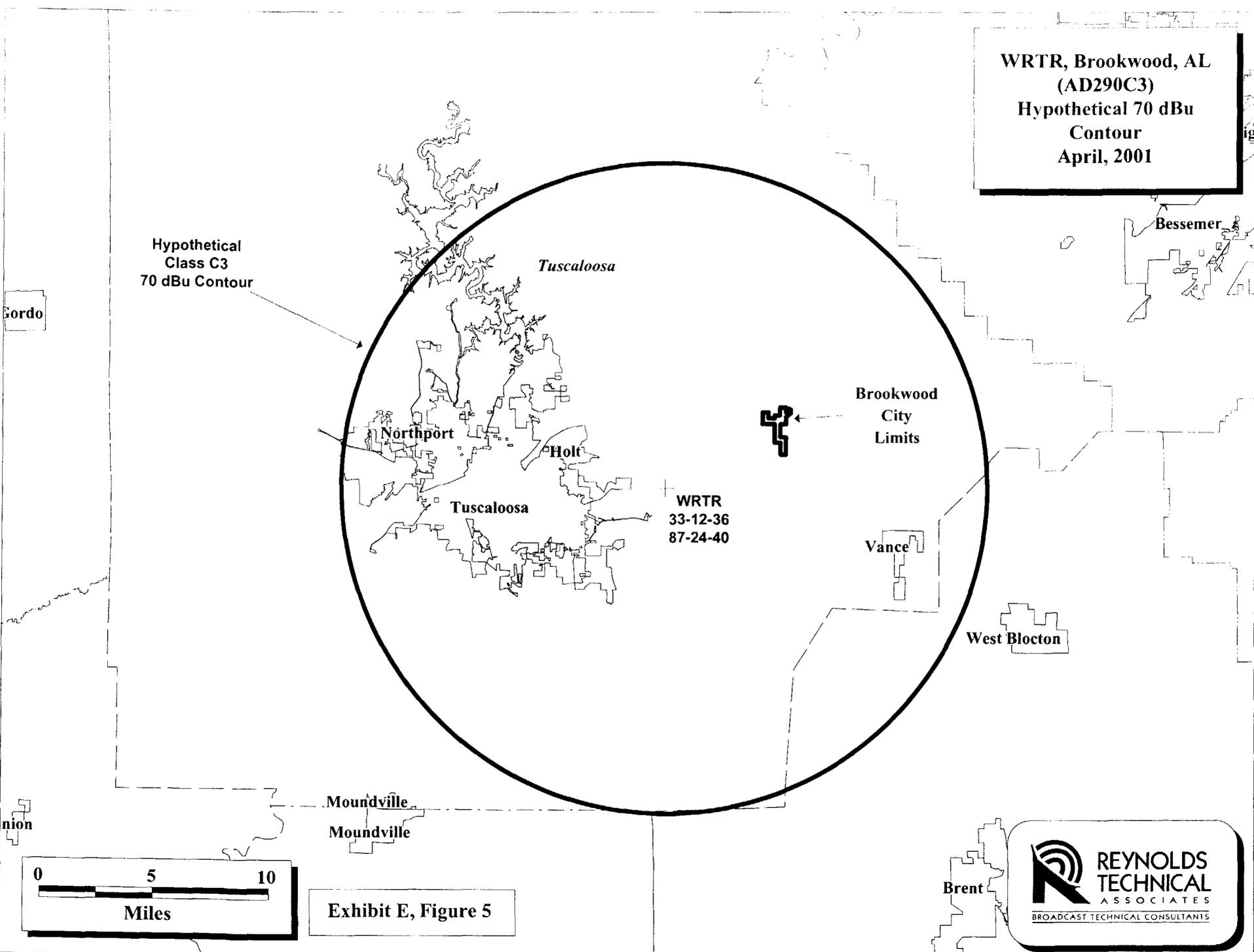
[Depicting spectrum changes required to allot Ch 290C3]

(Using proposed allotment coordinates as reference)

REFERENCE					DISPLAY DATES		
33 12 36 N.			Class C3				DATA 04-20-01
87 24 40 W.			Current rules spacings				SEARCH 04-20-01
----- Channel 290 -105.9 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Brookwood</b>			<b>AL</b>	<b>59.2</b>	<b>9.82</b>		
Reference Coordinates:							
North latitude: 33-15-19							
West Longitude: 87-19-14							
<b>RADD</b>	<b>290A</b>	<b>Moundville</b>	<b>AL</b>	<b>213.0</b>	<b>27.65</b>	<b>142.0</b>	<b>-114.35</b>
Of No Concern:							
Proposed allotment in original petition							
for WRTR. Substitution in counterproposal							
to Ch 290C3 for Ch 290A and							
change in community of license to Brookwood.							
<b>WENN</b>	<b>290A</b>	<b>Trussville</b>	<b>AL</b>	<b>59.5</b>	<b>76.50</b>	<b>142.0</b>	<b>-65.50 *</b>
Of No Concern:							
Mutual exclusive channel swap							
proposed between WENN and WRTR.							
See WENN Ch 288C2 Hoover, AL below.							
<b>RADD</b>	<b>290A</b>	<b>Brilliant</b>	<b>AL</b>	<b>339.7</b>	<b>96.23</b>	<b>142.0</b>	<b>-45.77 *</b>
Of No Concern:							
Proposed allotment in original petition							
for WKXM. Modified in counterproposal							
to substitution of Ch 249A for Ch 290A.							
<b>WKXFM</b>	<b>290A</b>	<b>Winfield</b>	<b>AL</b>	<b>338.3</b>	<b>98.05</b>	<b>142.0</b>	<b>-43.95 *</b>
Of Concern:							
Substitution of Ch 249A for							
Ch 290A proposed with a site change							
<b>WRTR</b>	<b>288A</b>	<b>Tuscaloosa</b>	<b>AL</b>	<b>253.9</b>	<b>13.97</b>	<b>42.0</b>	<b>-28.03 *</b>
Of No Concern:							
Present licensed facility of							
WRTR before proposed channel swap,							
with WENN, Upgrade and change in							
WRTR community of license							
<b>WMXU</b>	<b>291C2</b>	<b>Starkville</b>	<b>MS</b>	<b>274.6</b>	<b>116.52</b>	<b>117.0</b>	<b>-0.48 *</b>
<b>WENN.P</b>	<b>288C2</b>	<b>Hoover</b>	<b>AL</b>	<b>251.1</b>	<b>59.04</b>	<b>56.0</b>	<b>3.04 *</b>
Of Note:							
Allotment of Ch 288C2							
proposed at Hoover for WENN at;							
NL: 33-22-41, WL: 86-48-35							
<b>WZHT</b>	<b>289C</b>	<b>Troy</b>	<b>AL</b>	<b>139.4</b>	<b>180.33</b>	<b>176.0</b>	<b>4.33 *</b>
<b>WJXM</b>	<b>289C2</b>	<b>De Kalb</b>	<b>MS</b>	<b>242.0</b>	<b>133.84</b>	<b>117.0</b>	<b>16.84</b>
<b>WYAMFM</b>	<b>289A</b>	<b>Addison</b>	<b>AL</b>	<b>14.4</b>	<b>125.45</b>	<b>89.0</b>	<b>36.45</b>
-----							



**WRTR, Brookwood, AL  
(AD290C3)  
Hypothetical 70 dBu  
Contour  
April, 2001**



Hypothetical  
Class C3  
70 dBu Contour

Tuscaloosa

Northport

Holt

Tuscaloosa

WRTR  
33-12-36  
87-24-40

Brookwood  
City  
Limits

Vance

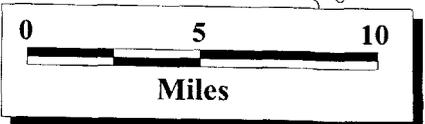
West Blocton

Bessemer

Moundville  
Moundville

Brent

Gordo

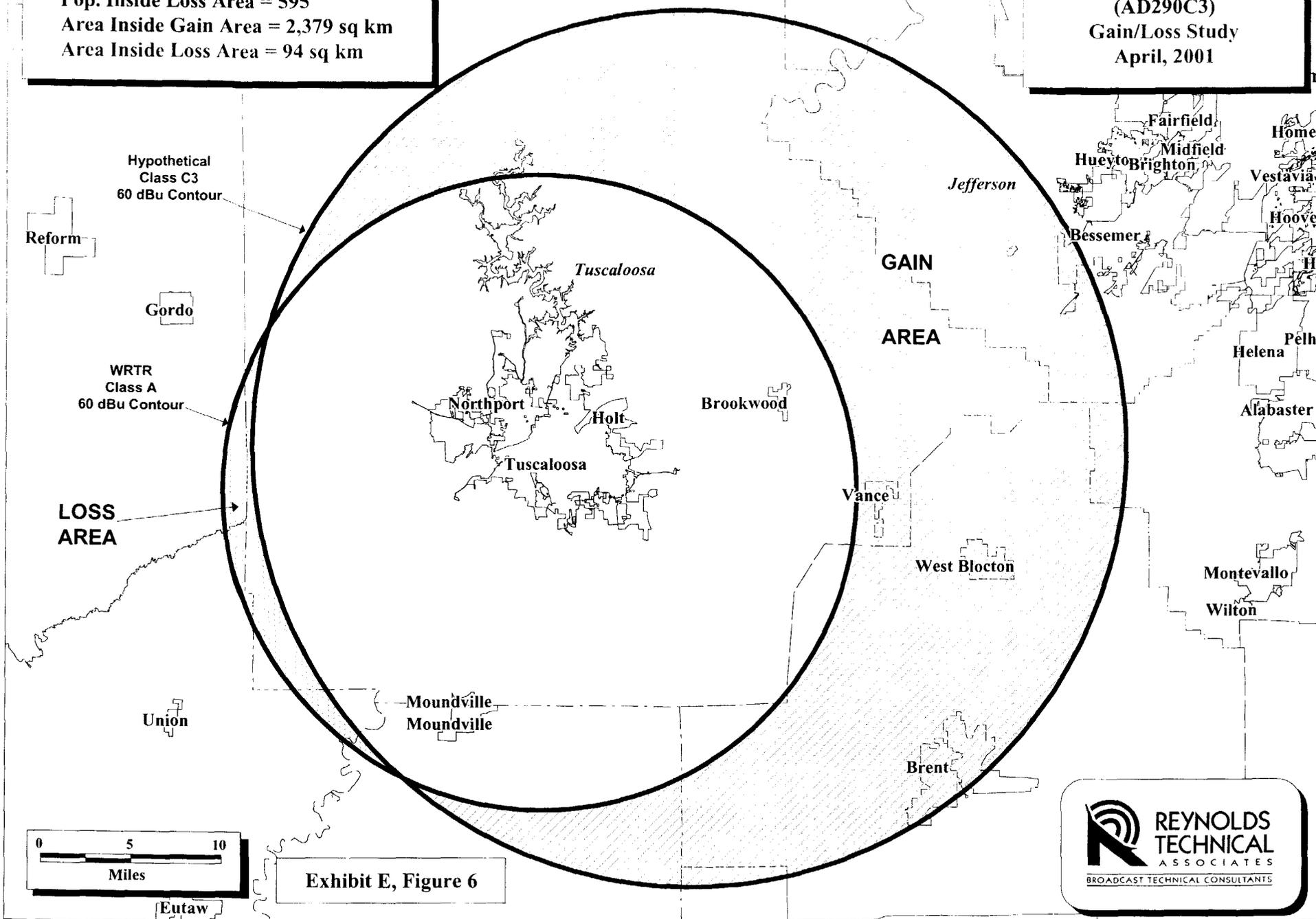


**Exhibit E, Figure 5**



Pop. Inside Gain Area = 30,548  
Pop. Inside Loss Area = 595  
Area Inside Gain Area = 2,379 sq km  
Area Inside Loss Area = 94 sq km

WRTR, Brookwood, AL  
(AD290C3)  
Gain/Loss Study  
April, 2001



Hypothetical Class C3 60 dBu Contour

Gordo

WRTR Class A 60 dBu Contour

LOSS AREA

Union

Moundville Moundville

GAIN AREA

Brookwood

Vance

West Blocton

Brent

Jefferson

Fairfield  
Hueytown  
Brighton  
Midfield  
Bessemer  
Home  
Vestavia  
Hoover  
Helena  
Pelham  
Alabaster  
Montevallo  
Wilton

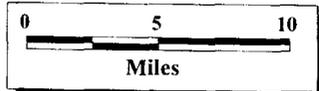


Exhibit E, Figure 6



Eutaw

**Stations Included in Remaining Services Study**

- 1 - WTID, channel 269C2, Reform, Alabama
- 2 - WTXT, channel 251C1, Fayette, Alabama
- 3 - WZBQ, channel 231C, Carrollton, Alabama
- 4 - WUAL, channel 218C1, Tuscaloosa, Alabama
- 5 - WTUG, channel 225C1, Tuscaloosa, Alabama

WRTR, Brookwood, AL  
(AD290C3)  
Remaining Services Study  
April, 2001

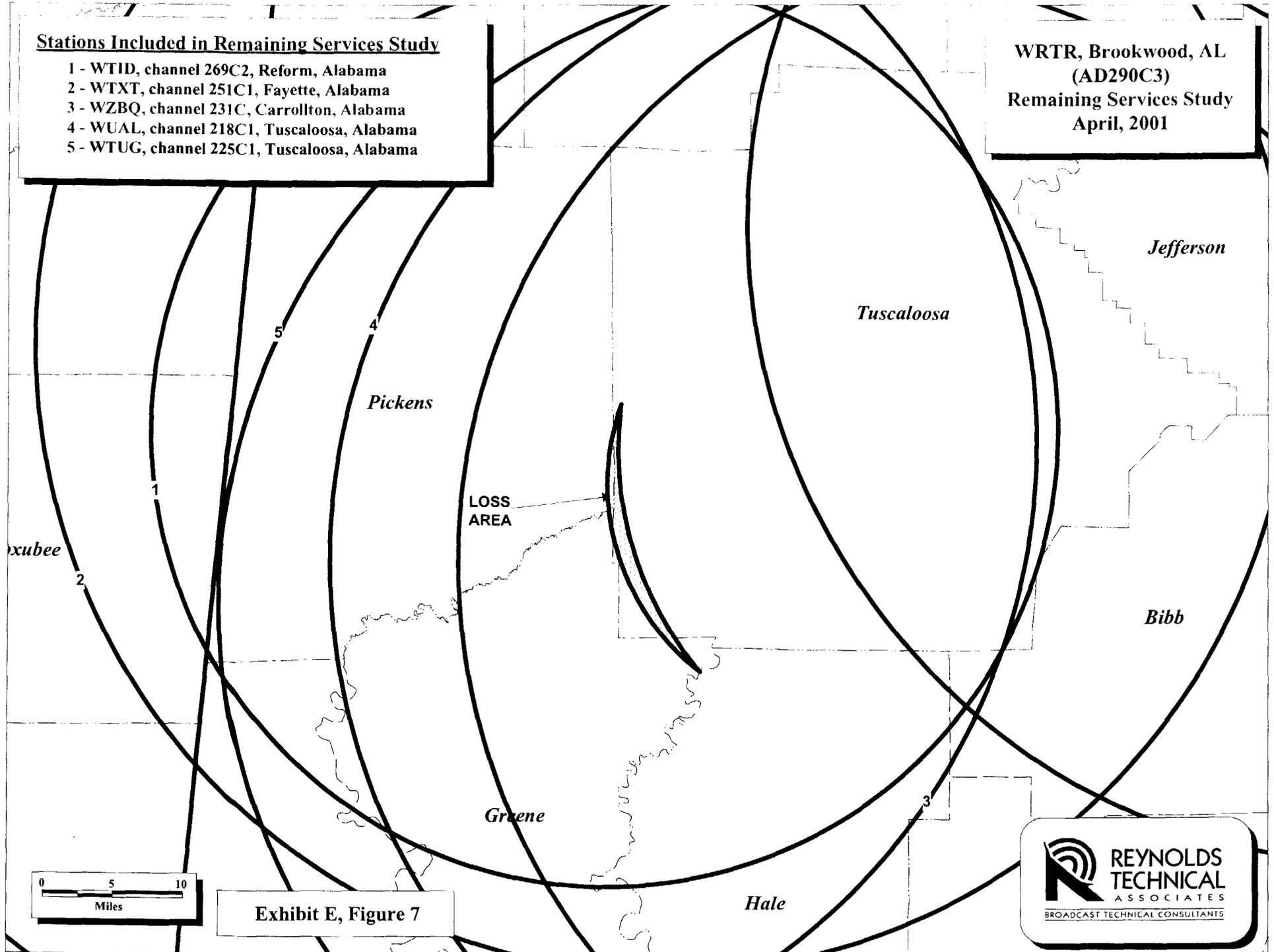


Exhibit E, Figure 7



**Engineering Statement  
In Support of a  
Comments and Amended Proposal  
MM Docket 01-62, RM-10053  
The Joint Petitioners**

**Allocation Study – Ch 249A Winfield, AL (WKXM)**  
[Depicting spectrum changes required to allot Ch 249A]  
(Using proposed allotment coordinates as reference)

REFERENCE							DISPLAY DATES
33 59 47 N.			Class A				DATA 04-20-01
87 43 43 W.			Current rules spacings				SEARCH 04-20-01
----- Channel 249A - 97.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Winfield</b>			<b>AL</b>	<b>227.6</b>	<b>11.10</b>		
Reference Coordinates:							
North Latitude: 33-59-47							
West Longitude: 87-43-43							
<b>WKGL</b>	<b>249A</b>	<b>Russellville</b>	<b>AL</b>	<b>3.9</b>	<b>66.61</b>	<b>115.0</b>	<b>-48.39 *</b>
Of Concern:							
Substitution of Ch 278A at the							
licensed site of WKGL proposed.							
Ch 278A can be substituted for Ch 249A							
at Russellville only if WQEN does not remain							
a class C at Gadsden and is granted a class C1							
Trussville. <u><b>The use of Ch 278A at Russellville</b></u>							
<u><b>makes the upgrade of WENN &amp; WQEN interdependent.</b></u>							
WTXT	251C1	Fayette	AL	183.3	74.99	75.0	-0.01 *
WKLD.C	249A	Oneonta	AL	92.7	115.06	115.0	0.06 *
WWMS	248C1	Oxford	MS	278.2	133.15	133.0	0.15 *
WKLD	249A	Oneonta	AL	92.7	115.19	115.0	0.19 *
R---	250A	Marietta	MS	310.2	87.56	72.0	15.56
WEZZFM	249A	Clanton	AL	142.9	161.51	115.0	46.51
RADD	249A	Bethel Springs	TN	330.1	164.73	115.0	49.73
-----							



WKXM, Winfield, AL  
Channel 249A  
Hypothetical 70 dBu  
Contour  
April, 2001

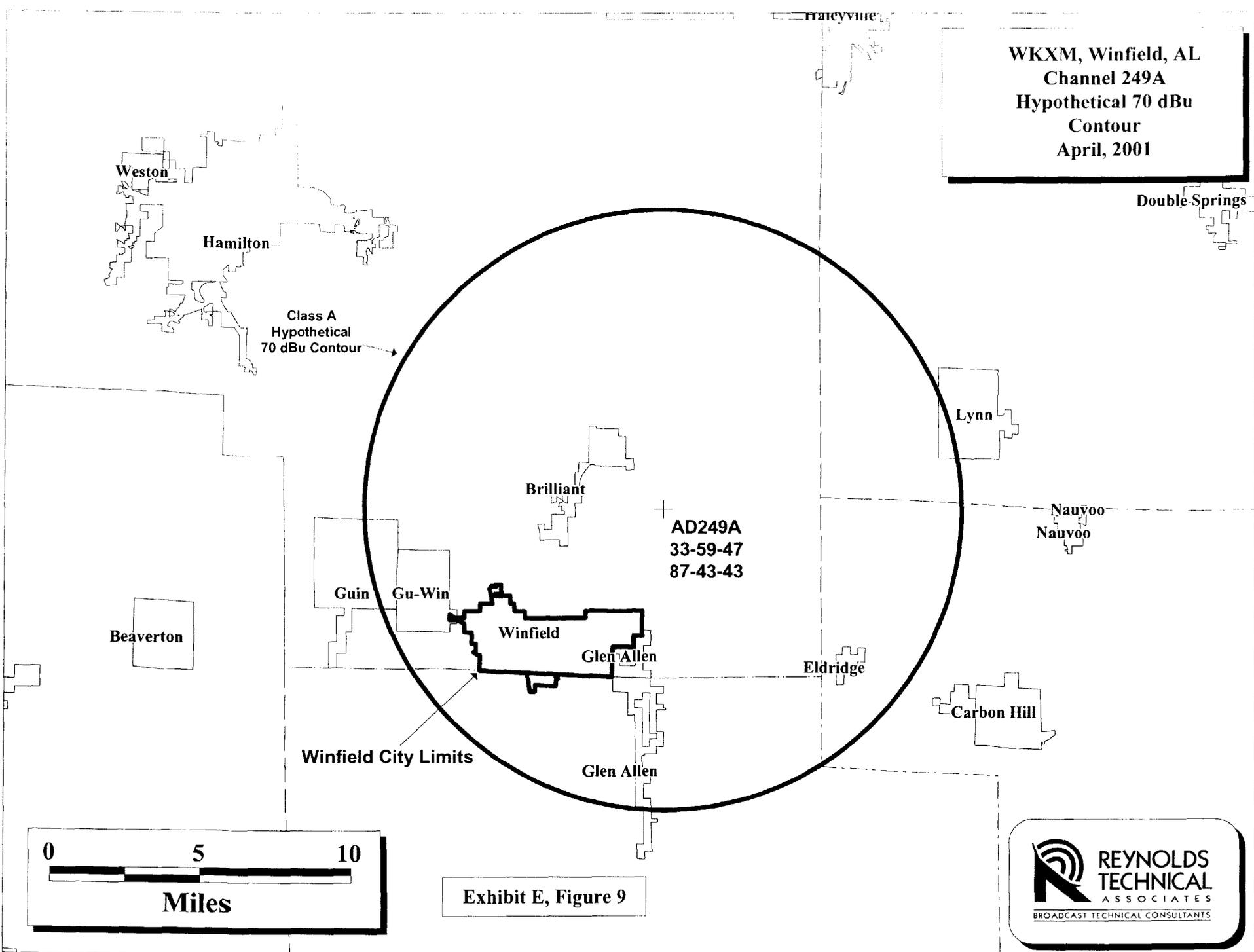
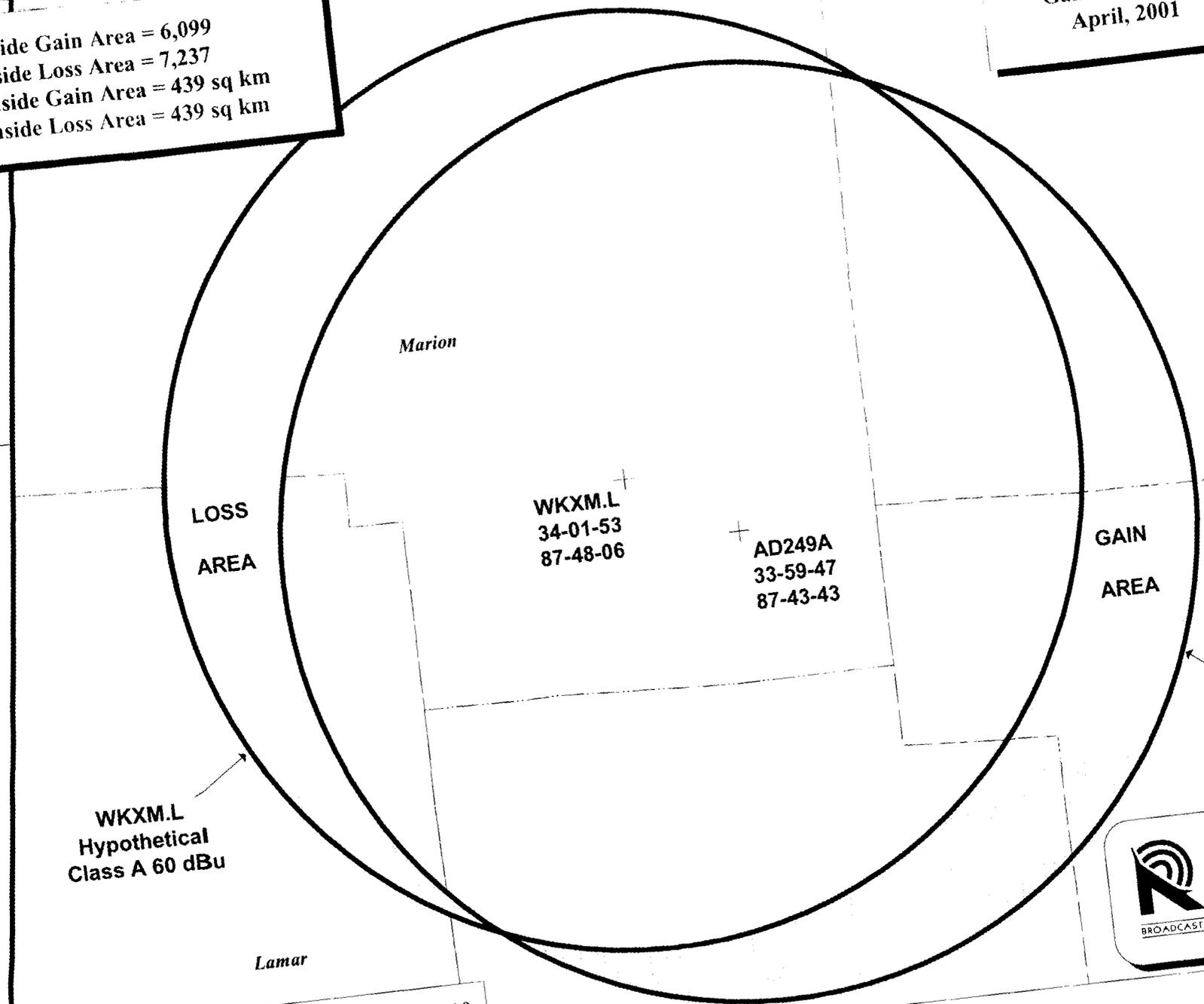


Exhibit E, Figure 9

WKXM, Winfield, AL  
Channel 249A  
Gain/Loss Study  
April, 2001

Pop. Inside Gain Area = 6,099  
Pop. Inside Loss Area = 7,237  
Area Inside Gain Area = 439 sq km  
Area Inside Loss Area = 439 sq km



WKXM.L  
Hypothetical  
Class A 60 dBu

AD249A  
Hypothetical  
Class A 60 dBu

Exhibit E, Figure 10



**Engineering Statement  
In Support of a  
Comments and Amended Proposal  
MM Docket 01-62, RM-10053  
The Joint Petitioners**

**Allocation Study – Ch 278A Russellville, AL (WKGL)**  
[Depicting spectrum changes required to allot Ch 278A]  
(Using proposed allotment coordinates as reference)

REFERENCE							DISPLAY DATES
34 35 44 N.	Class A DATE						DATA 04-20-01
87 40 47 W.	Current rules spacings						SEARCH 04-23-01
----- Channel 278 -103.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>WQEN.A</b>	<b>279C</b>	<b>Gadsden</b>	<b>AL</b>	<b>120.7</b>	<b>149.13</b>	<b>165.0</b>	<b>-15.87 *</b>
Of Concern: Substitution of Ch 279C1 and Change in community of license proposed. See WQEN at Trussville below.							
<b>AVAC</b>	<b>279C</b>	<b>Gadsden</b>	<b>AL</b>	<b>117.2</b>	<b>152.22</b>	<b>165.0</b>	<b>-12.78 *</b>
Of Concern: Pending one-step upgrade of Of WQEN (Ch 279C allotment reference). To be withdrawn upon approval of instant counterproposal							
<b>RADD</b>	<b>279C</b>	<b>Springville</b>	<b>AL</b>	<b>117.2</b>	<b>152.22</b>	<b>165.0</b>	<b>-12.78 *</b>
Of Note: Reference coordinates for instant NPRM Will be withdrawn upon grant of The Joint Petitioner's Counterproposal <u><b>Demonstrates MX spacing of WENN upgrade with WQEN present NPRM</b></u>							
WRBO.C	278C1	Como	MS	278.4	203.53	200.0	3.53 *
WRBO	278C1	Como	MS	278.4	203.53	200.0	3.53 *
WQEN	279C1	Gadsden	AL	126.9	142.18	133.0	9.18 *
WEUPFM	276A	Moulton	AL	99.1	42.24	31.0	11.24
WKDF	277C	Nashville	TN	25.3	176.72	165.0	11.72
WEUPFM	276C3	Moulton	AL	106.8	55.06	42.0	13.06
<b>WQEN.P</b>	<b>279C1</b>	<b>Trussville</b>	<b>AL</b>	<b>150.0</b>	<b>147.57</b>	<b>133.0</b>	<b>14.57</b>
Of Note: Change in site, class and community of license proposed in instant counterproposal at, NL: 33-26-38, WL: 86-52-47							
WJBBFM	224A	Haleyville	AL	172.9	40.49	10.0	30.49
-----							

Continued on next page

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**Allocation Study – Ch 278A Russellville, AL (WKGL)**  
[Depicting spectrum changes required to allot Ch 278A]  
(Using proposed allotment coordinates as reference)

REFERENCE					DISPLAY DATES			
34 35 44 N.	Class A DATE				DATA	04-20-01		
87 40 47 W.	Current rules spacings				SEARCH	04-23-01		
----- Channel 278 -103.5 MHz -----								
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin	
<b>WKEA.P 278A</b>		<b>Scottsboro</b>	<b>AL</b>	<b>90.3</b>	<b>154.84</b>	<b>115.0</b>	<b>39.84</b>	
Of Note: Substitution of Ch 278A for Ch 252A at licensed site of WKEA proposed in instant counterproposal.								
<b>WACR.P 280C2</b>		<b>Okolona</b>	<b>MS</b>	<b>223.3</b>	<b>111.94</b>	<b>55.0</b>	<b>56.94</b>	
Of Note: Change in site and community of license proposed in instant counterproposal at, NL: 33-51-38, WL: 88-30-44								



**Engineering Statement  
In Support of a  
Comments and Amended Proposal  
MM Docket 01-62, RM-10053  
The Joint Petitioners**

**Allocations Study – Ch 289C0 Troy, AL (WZHT)**  
[Depicting no spectrum changes required to allocate Ch 289C0]  
(Using proposed allotment coordinates as reference)

REFERENCE						DISPLAY DATES	
31 52 03 N			CLASS = C0			DATA	04-17-01
86 14 58 W			Current Spacings			SEARCH	04-23-01
----- Channel 289 - 105.7 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	
-----							
<b>Community of</b>	<b>Troy</b>		<b>AL</b>	<b>27.25</b>	<b>103.9</b>		
Reference Coordinates:							
North latitude: 31-48-31							
West Longitude: 85-58-12							
<b>WZHT LIC 289C</b>	<b>Troy</b>		<b>AL</b>	<b>14.45</b>	<b>34.7</b>	<b>281.0</b>	<b>-266.55 *</b>
Of Note:							
Licensed site and class of WZHT before proposed modification to class C0 in instant counterproposal							
<b>WENN.P ADD 288C2</b>	<b>Hoover</b>		<b>AL</b>	<b>175.57</b>	<b>342.6</b>	<b>176.0</b>	<b>-.35 *</b>
Of Note:							
Proposed allotment of Ch 288C2 Hoover for WENN at;							
NL: 33-22-41, WL: 86-48-35							
WJXM LIC 289C2	De Kalb		MS	244.21	291.4	239.0	5.21
WBFZ.C CP 287C2	Selma		AL	105.23	295.6	89.0	16.23
<b>RADD ADD 288C3</b>	<b>Pleasant Grove</b>		<b>AL</b>	<b>184.54</b>	<b>341.6</b>	<b>163.0</b>	<b>21.54</b>
Of Note:							
Allotment of Ch 288C3 proposed in NPRM.							
<b>RADD ADD 290A</b>	<b>Moundville</b>		<b>AL</b>	<b>176.84</b>	<b>315.8</b>	<b>152.0</b>	<b>24.84</b>
Of Note:							
Allotment of Ch 288C3 proposed in NPRM.							
WSTHFM LIC 291C1	Alexander City		AL	122.94	36.2	94.0	28.94
WXFX LIC 236C2	Prattville		AL	68.02	347.5	31.0	37.02
WRTR LIC 288A	Tuscaloosa		AL	189.92	320.3	152.0	37.92
RDEL DEL 290A	Trussville		AL	192.51	347.4	152.0	40.51
WENN LIC 290A	Trussville		AL	192.51	347.4	152.0	40.51
ALLO VAC 290A	Ellaville		GA	195.11	78.6	152.0	43.11
RDEL DEL 288A	Tuscaloosa		AL	196.60	326.2	152.0	44.60
WYAI LIC 288A	Bowdon		GA	197.53	27.5	152.0	45.53
WMXV LIC 289C2	Canton		GA	295.95	33.9	239.0	56.95
WYAMFM LIC 289A	Addison		AL	281.09	344.4	215.0	66.09



Pop. Inside Gain Area = 7,515  
Pop. Inside Loss Area = 57,061  
Area Inside Gain Area = 4,516 sq km  
Area Inside Loss Area = 988 sq km

WZHT Licensed  
Hypothetical 60 dBu

WZHT, Troy, AL  
(AD289C0)  
Gain/Loss Study  
April, 2001

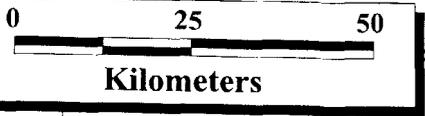
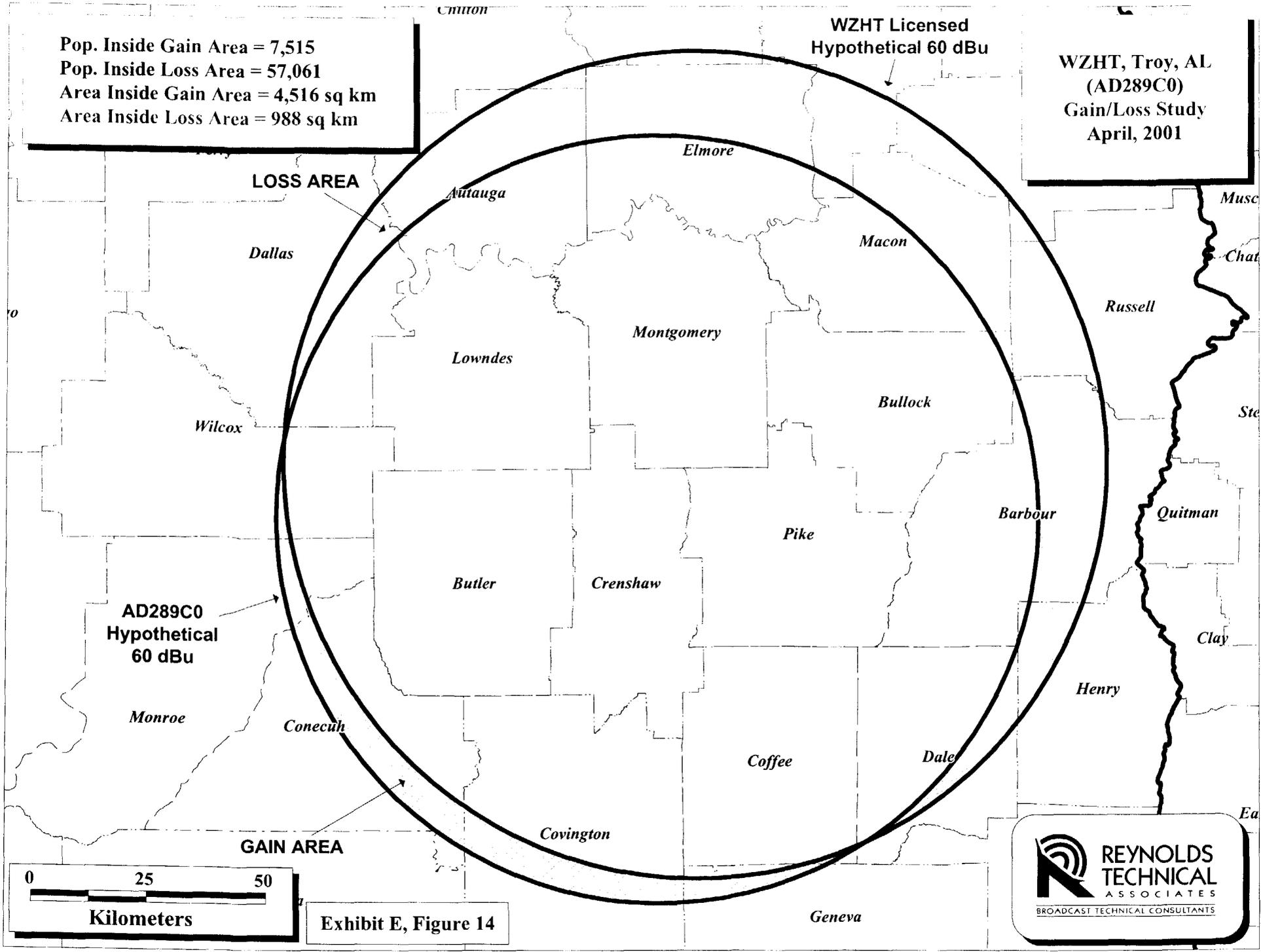


Exhibit E, Figure 14

