

As shown in the attached Technical Statement of Graham Brock, Inc., Channel 221C3 can be allotted to Merryville, with a site restriction of 7.7 kilometers northeast of the community in order to specify the present KROK transmitter site.² The reference site for the proposed allotment is North Latitude 30° 48' 35" and West Longitude 93° 29' 29". Channel 221C3 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. From the proposed reference site, the present KROK facilities provide a 3.16 mV/m (70 dBu) signal to Merryville.

The allotment of Channel 221C3 to Merryville, Louisiana, will serve the public interest by providing that community with its first locally licensable FM channel without depriving De Ridder, of its only local service -- two FM stations (one commercial, one non-commercial) and one AM station will remain licensed to De Ridder.³ Merryville is not located in any urbanized area. Although Merryville is near the Lake Charles, Louisiana, urbanized area, the proposed 70 dBu contour of the proposed Channel 221C3 will not provide service to any of the urbanized area.

Once Channel 221C3 is allotted to Merryville, Louisiana, WCB will submit the required minor change application for construction permit (FCC Form 301) seeking authority to make the changes to the facilities of KROK. Apex Broadcasting, Inc. ("Apex"), the proposed assignee of Station KROK (see BALH-20010830AAW), has advised the undersigned that if Apex is the

² The current license for KROK was granted pursuant to Section 73.215 of the Commission's rules. However, there is a license modification pending to delete contour protection for the KROK license (BMLH-20010921AAF). At the present KROK site, Channel 221C3 meets the Commission's minimum distance separation requirements.

³ Commercial FM station KAOK-FM, Channel 250C2, non-commercial FM station KBAN, Channel 216C3, and AM station KDLA, 1010 kHz, will remain licensed to De Ridder.

licensee of KROK at the time Channel 221C3 8 is allotted to Merryville, Apex will submit the required application for construction permit.

WHEREFORE, for the foregoing reasons, WCB request that the Mass Media Bureau amend Section 73.202 of the Commission's Rules as follows:

Merryville, Louisiana

Present	Proposed
None	221C3

De Ridder, Louisiana

Present	Proposed
221C3, 250C2	250C2

Respectfully submitted,

**WEST CENTRAL BROADCASTING
CO., INC.**

By



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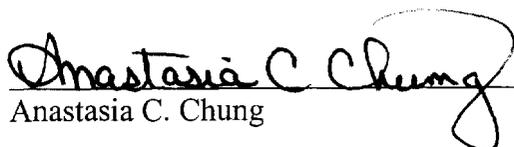
Its Attorney

November 28, 2001

CERTIFICATE OF SERVICE

This is to certify that I, Anastasia C. Chung, have filed the foregoing Petition to Rulemaking with the Federal Communications Commission on this 28th day of November, 2001, and that a copy has been served by way of U.S. mail, postage pre-paid, upon:

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554


Anastasia C. Chung

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING
WEST CENTRAL BROADCASTING CO., INC.
RE-ALLOT CHANNEL 221C3
MERRYVILLE, LOUISIANA
October 2001

TECHNICAL EXHIBIT

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PETITION FOR RULE MAKING
WEST CENTRAL BROADCASTING CO., INC.
RE-ALLOT CHANNEL 221C3
MERRYVILLE, LOUISIANA
October 2001

TECHNICAL STATEMENT

1. This technical statement and attached exhibits have been prepared on behalf of West Central Broadcasting Co., Inc. ("WCB"), licensee of KROK, Channel 221C3, De Ridder, Louisiana. WCB herein requests Channel 221C3 be re-allotted from De Ridder, Louisiana to Merryville, Louisiana. The proposed allotment to Merryville is mutually exclusive with the present KROK allotment at De Ridder, Louisiana.

DISCUSSION

2. The town of Merryville, Louisiana, is located in northwestern Beauregard Parish, Louisiana, with a population of 1,126 persons.¹ Merryville has a Mayor and five member town council. The town of Merryville provides water, sewer and trash collection services to its residents. The town has a four officer Police Force, as well as a volunteer Fire Department. There are numerous businesses, churches and residential areas in Merryville.² Merryville presently has no licensed AM or FM services. Further, Merryville is not located in any Urbanized areas and is designated as a city, as defined by the U.S. Census of Louisiana.

1) 2000 U.S. Census.

2) The information concerning Merryville was supplied by Candy Meyers, Merryville Town Clerk.

PROPOSAL

3. Channel 221C3 can be allotted to Merryville, Louisiana, with a site restriction of 7.7 kilometers northeast of the community in order to specify the present KROK transmitter site.³ The reference site for the proposed allotment is North Latitude 30° 48' 35" and West Longitude 93° 29' 29".⁴

4. Attached as Exhibit #1 is a map depicting the area to locate Channel 221C3, to be licensed to Merryville, Louisiana. Further, attached as Exhibit #2 is a §73.207 spacing study demonstrating that Channel 221C3 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. From the proposed reference site, the present KROK facilities provide a 3.16 mV/m (70 dBu) signal to Merryville.

5. Therefore, WCB herein requests the following changes in §73.202 of the Commission's rules.

Merryville, Louisiana

Present	Proposed
None	221C3

De Ridder, Louisiana

Present	Proposed
221C3, 250C2	250C2

-
- 3) It is noted that the current license for KROK was granted pursuant to §73.215 of the Commission's rules. However, there is a license modification pending to delete contour protection for the KROK license (BMLH-20010921AAF). At the present KROK site, Channel 221C3 meets the Commission's minimum distance separation requirements.
- 4) The existing/proposed Channel 221C3 site is located 87.8 kilometers from VHF TV station KFDM-TV, Channel 6, Beaumont, Texas. This proposal requests the re-allotment of Channel 221C3 from De Ridder to Merryville, Louisiana, with no upgrade proposed. As such, no non-commercial preclusionary study is being submitted, since no actual change of facilities is proposed. Therefore, the requirements outlined in MM Docket #86-144 do not apply.

PUBLIC INTEREST

6. The allotment of Channel 221C3 to Merryville, Louisiana, will provide that community with its first locally licensable FM channel, without depriving De Ridder, Louisiana, of its only local service, since two FM stations (one commercial, one non-commercial) and one AM station will remain licensed to De Ridder.⁵ As denoted above, Merryville is not located in any urbanized area, but is near the Lake Charles, Louisiana, urbanized area. However, the proposed 70 dBu contour of the proposed Channel 221C3 will not provide service to any of the urbanized area.

7. Once Channel 221C3 is allotted to Merryville, Louisiana, WCB will submit the required minor change application for construction permit (FCC Form 301) seeking authority to make the changes to the facilities of KROK.

8. The foregoing technical statement was prepared on behalf of West Central Broadcasting Co., Inc., by Graham Brock, Inc., its Technical Consultants. All data related to FM facilities was extracted from the CDBS database; all population data is from the PL 94-171 files (2000 Census). We assume no liability for errors or omissions in those databases that may be adverse to the requests contained herein.

5) Commercial FM station KAOK-FM, Channel 250C2, non-commercial FM station KBAN, Channel 216C3, and AM station KDLA, 1010 kHz, will remain licensed to De Ridder. Since no change in site is proposed for KROK, there are no loss or gain area issues associated with this proposal.

Graham Brock, Inc. - Broadcast Technical Consultants

CLASS A CITY GRADE LIMIT

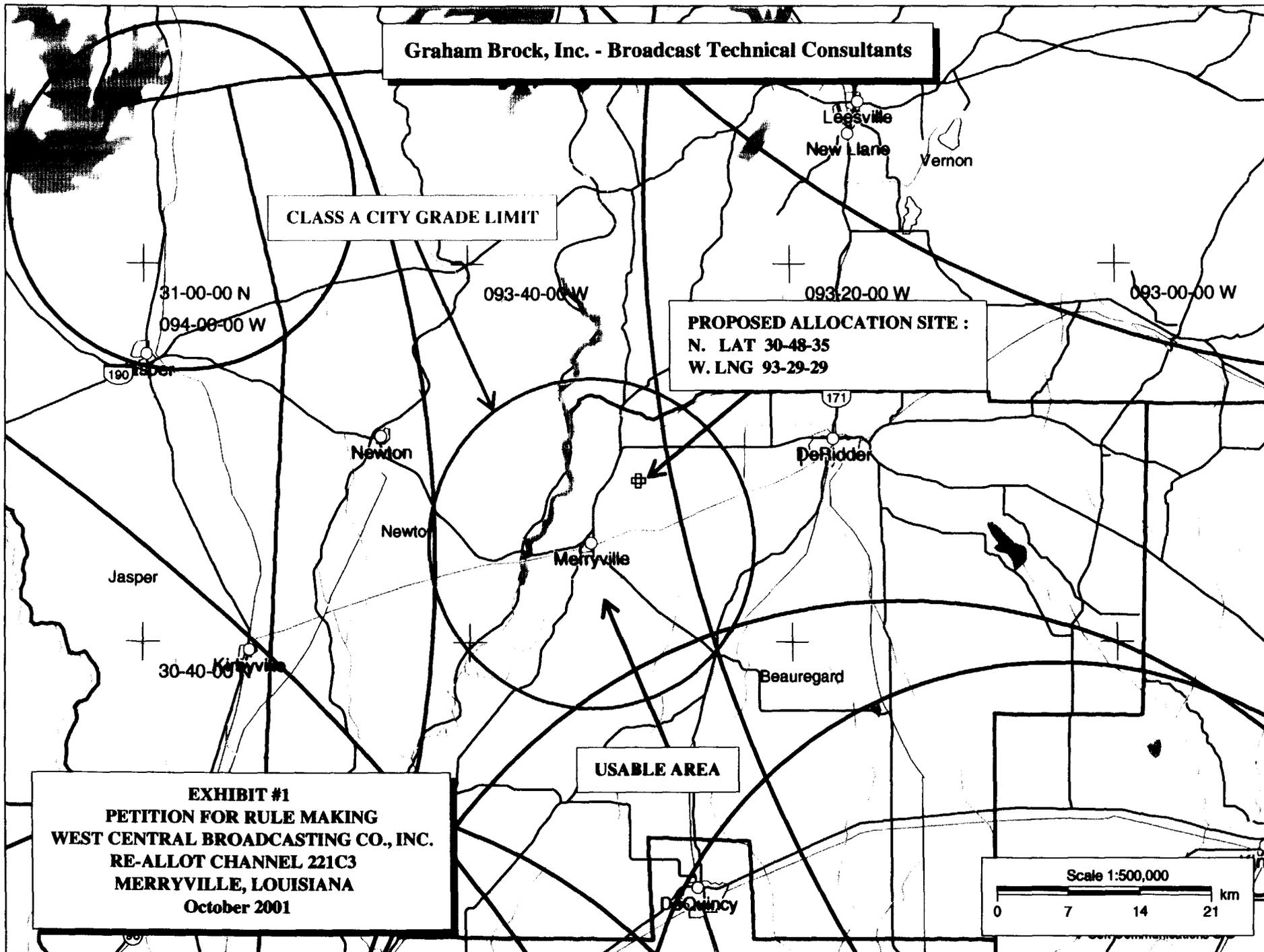
PROPOSED ALLOCATION SITE :
N. LAT 30-48-35
W. LNG 93-29-29

USABLE AREA

EXHIBIT #1
PETITION FOR RULE MAKING
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MERRYVILLE, LOUISIANA
October 2001

Scale 1:500,000

0 7 14 21 km



**PETITION FOR RULE MAKING
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RE-ALLOT CHANNEL 221C3
MERRYVILLE, LOUISIANA
October 2001**

EXHIBIT #2

ALLOCATION STUDY FOR MERRYVILLE, LOUISIANA
USING PRESENT KROK SITE AS REFERENCE

REFERENCE		DISPLAY DATES
30 48 35 N	CLASS C3	DATA 09-29-01
93 29 29 W	Current rules spacings	SEARCH 10-03-01
----- CHANNEL 221 - 92.1 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KROK	221C3	De Ridder	LA	0.0	0.00	153.0	-153.00
LIC C	30 48 35	93 29 29	12.000 kW	143M	0.0	95.1	
		West Central Broadcasting Co.		BLH-19980526KB			
KLIL	221A	Moreauville	LA	79.1	145.31	142.0	3.31
LIC CN	31 02 53	91 59 47	6.000 kW	91M	90.3	88.3	
		Cajun Broadcasting, Inc.		BLH-19950515KB			
KVCLFM	221A	Winnfield	LA	32.7	150.66	142.0	8.66
LIC CN	31 56 54	92 37 37	6.000 kW	64M	93.6	88.3	
		Harrison Broadcast Organization		BLH-19930222KE			
KAVX	220C2	Lufkin	TX	299.8	126.40	117.0	9.40
LIC CN	31 22 08	94 38 45	23.000 kW	222M	78.6	72.7	
		Lufkin Ed Broadcasting Foundation		BLED-19981120KC			
KOJO.A	219C2	Lake Charles	LA	159.0	72.67	56.0	16.67
APP VN	30 11 52	93 13 12	15.000 kW	120M	45.2	34.8	
		Radio Maria, Inc.		BPED-19970624ML			
KETXFM	222C2	Livingston	TX	267.0	137.36	117.0	20.36
LICZCN	30 44 18	94 55 26	32.000 kW	185M	85.4	72.7	
		Polk County Broadcasting Company		BLH-19910923KA			
KOJO	219A	Lake Charles	LA	145.6	72.58	42.0	30.58
LIC CN	30 16 10	93 03 51	1.850 kW	127M	45.1	26.1	
		Radio Maria, Inc.		BLED-19960826KC			
KWYX	274C2	Jasper	TX	301.9	52.82	17.0	35.82
LIC CN	31 03 36	93 57 42	26.000 kW	134M	32.8	10.6	
		Lasting Value Radio, Inc.		BLH-19961009KG			
KWYX.C	274C2	Jasper	TX	301.9	52.82	17.0	35.82
CP ZCX	31 03 36	93 57 42	50.000 kW	150M	32.8	10.6	
		Lasting Value Radio, Inc.		BPH-20000922ADF			
KRTS.C	221C1	Seabrook	TX	227.3	249.12	211.0	38.12
CP CN	29 16 33	95 22 45	100.000 kW	299M	154.8	131.1	
		KRTS, Inc.		BMPH-19960320IC			

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

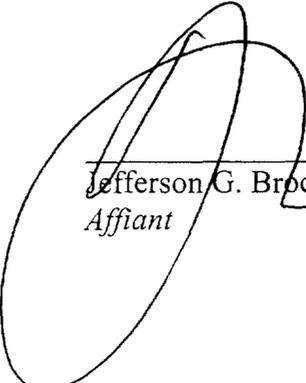
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by West Central Broadcasting Co., Inc., licensee of Radio Station KROK, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 4th day of October, 2001.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 4th day of October, 2001.*



Notary Public, State of Georgia
My Commission Expires: April 20, 2002