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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

In the Matter of ) MM Docket No. \_\_\_\_  
 )  
Amendment of Section 73.202(b) ) RM-  
Table of Allotments )  
FM Broadcast Stations )  
Ferrysburg, Michigan )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

PETITION FOR RULEMAKING

Northern Paul Bunyan Radio Company (hereinafter "NPB"), by its attorney, in accordance with Section 1.401 and 1.420 of the Commission's rules, hereby petitions the Commission for the initiation of a rulemaking proceeding to amend the FM Table of assignments, Section 73.202 of the Commission's rules, to allot new FM channel 226A to the city of Ferrysburg, Michigan. In support whereof, the following is submitted:

The city of Ferrysburg, Michigan, is a separate independent community recognized by the U.S. Census with a 2000 Census population of 3,040 persons. It is located in Ottawa County with a population of 238,314 persons. Ferrysburg (zip code 49409) is located on the shores of Lake Michigan and Spring lake and was first called Ottawa Point when first settled in 1850. It has continued as a community since that time up to its modern existence as Ferrysburg. The city is governed by a Council

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Manager system which includes a Mayor, six Council Members and a City Manager. The City also has Police and Fire Departments, a Plumbing and Mechanical Division, a Director of Emergency Management, a Director of Economic Development, and Departments responsible for zoning, public works, Recreation and Transit. The city also has its own museum and library. The area is extremely popular with tourists and those who enjoy water sports, and those business activities compliment the quiet residential setting enjoyed by the permanent residents. Taken together, these facts clearly demonstrate that Ferrysburg meets the recognition of community for FCC allotment purposes. Ferrysburg presently has no local aural radio service and the instant proposal would supply that first local aural radio service to the citizens of Ferrysburg as well as service to its surrounding county.

Attached hereto is an Engineering Statement including an Allocation Study which indicates that the new requested channel for Ferrysburg may be added to the Allocation Table fully consistent with all FCC spacing and interference rules without any other change being required in any other station or allocation. NPB also submits here its unqualified commitment to apply for use of the channel if allocated and upon grant of that application to diligently proceed to build and operate a station on that channel.

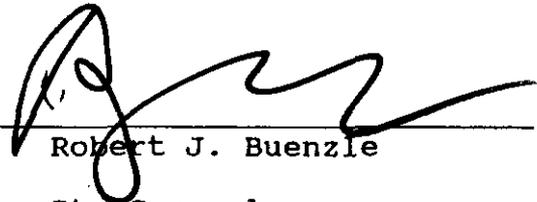
In sum, it is respectfully submitted that adoption of this Petition would be in the public interest in providing a First local broadcast service to the city of Ferrysburg in furtherance of the Commission's stated goal of providing the greatest possible service to the public. See generally, Implementation of BC Docket 80-90 to Increase the Availability of FM Broadcast Assignments, 57 RR 2d 863, 865 (1985). It is therefore requested that the Table of Allocations be modified as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Ferrysburg, Michigan	-	226A

Wherefore, it is respectfully submitted that the instant Petition for Rulemaking is in the public interest and should be adopted.

Respectfully Submitted,

**NORTHERN PAUL BUNYAN RADIO COMPANY**

by 

Robert J. Buenzle

Its Counsel

Law Offices  
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12110 Sunset Hills Road  
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Reston, Virginia 22090  
(703) 430-6751

February 7, 2002

Northern Paul Bunyan Radio Company

**Petition For Rulemaking**  
**FM Channel 226A**  
Ferrysburg, Michigan

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F. W. Hannel, PE  
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STATE OF ARIZONA            )  
                                  )            SS:  
COUNTY OF MARICOPA        )

F. W. Hannel, after being duly sworn upon oath,  
deposes and states:

He is a registered Professional Engineer, by  
examination, in the State of Illinois;

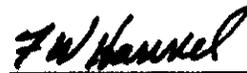
He is a graduate Electrical Engineer, holding Bachelor  
of Science and Master of Science degrees, both in Electrical  
Engineering;

His qualifications are a matter of public record and  
have been accepted in prior filings and appearances requiring  
Scrutiny of his professional qualifications;

The attached Engineering Report was prepared by him  
personally or under his supervision and direction and;

The facts stated herein are true, correct, and  
complete to the best of his knowledge and belief.

February 1, 2002



F. W. Hannel, P.E.

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Northern Paul Bunyan Radio Company

**Petition For Rulemaking  
FM Channel 226A  
Ferrysburg, Michigan**

**ENGINEERING STATEMENT**

This firm has been retained by Northern Paul Bunyan Radio Company to prepare this engineering statement in support of its Petition For Rulemaking seeking to amend the FM Table of Allotments to allot FM Channel 226A to Ferrysburg, Michigan as its first local aural service.

The community of Ferrysburg, Michigan, (2000 population of 3,040 persons), is located in Ottawa County, (2000 population of 238,314 persons). The community presently has no aural service licensed to it and the assignment of FM Channel 226A would provide the community with a first local aural service.

FM Channel 226A can be assigned to Ferrysburg, Michigan, (US Atlas Co-ordinates N43-05-04, W86-13-12) at allotment site co-ordinates N43-06-21, W86-11-39). This allotment site is 32. km, (2 miles), northeast of Ferrysburg, Michigan. A transmitter operating from the allotment site fully complies with the Commission's city grade illumination requirements as well as the minimum mileage separation requirements of Section 73.207 of the Rules. Attached as Exhibit E-1 is a channel study conducted from the allotment reference co-ordinates which demonstrates that the requested assignment can be made to Ferrysburg, Michigan.

In view of the foregoing, it is requested that the Commission amend the FM Table of Allotments as follows:

<b>Community</b>	<b>Present</b>	<b>Proposed</b>
<b>Ferrysburg, Michigan</b>	<b>----</b>	<b>226A</b>

The changes proposed by Northern Paul Bunyan Radio Company will provide the community of Ferrysburg, Michigan with a first local aural service and the proposed assignment of FM Channel 226A is not in conflict with any other proposal. The addition of a first local aural service to Ferrysburg, Michigan is clearly in the public interest and should be granted by the Commission.

Northern Paul Bunyan Radio Company

**Petition For Rulemaking  
FM Channel 226A  
Ferrysburg, Michigan**

**FM Channel Study  
FM Channel 226A  
Ferrysburg, Michigan  
N43-06-21 W86-11-39**

**Exhibit E-1**

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
971217	NEWAYGO	MI	223	A	V	39.8	31.0	42.5°	8.8
971217	NEWAYGO	MI	223	A	A	37.8	31.0	45.3°	6.8
971217	NEWAYGO	MI	223	A	A	38.1	31.0	43.1°	7.1
971218	NEWAYGO	MI	223	A	A	37.7	31.0	44.7°	6.7
971218	NEWAYGO	MI	223	A	A	38.6	31.0	54.3°	7.6
971218	NEWAYGO	MI	223	A	A	32.2	31.0	45.4°	1.2
WEVS	SAUGATUCK	MI	224	A	U	46.7	31.0	177.4°	15.7
WEVS	SAUGATUCK	MI	224	A	L	46.7	31.0	177.4°	15.7
WKJF-F	CADILLAC	MI	225	C1	V	133.6	133.0	31.0°	0.6
WKJF-F	CADILLAC	MI	225	C	U	133.6	165.0	31.0°	-31.4
WKJF-F	CADILLAC	MI	225	C	L	133.6	165.0	31.0°	-31.4 <sup>1</sup>
WKRT-F	CHICAGO	IL	226	B	U	178.2	178.0	221.2°	0.2
WKRT-F	CHICAGO	IL	226	B	L	178.2	178.0	221.2°	0.2
WJZI	MILWAUKEE	WI	227	B	U	139.2	113.0	269.2°	26.2
WJZI	MILWAUKEE	WI	227	B	L	139.2	113.0	269.2°	26.2
WBCT	GRAND RAPIDS	MI	229	B	U	75.1	69.0	134.4°	6.1
WBCT	GRAND RAPIDS	MI	229	B	L	75.1	69.0	134.4°	6.1

All Distances in Kilometers

<sup>1</sup> WJZQ(FM), formerly WKJF(FM), has filed a license application on FM Channel 225C1. See BLH-20011226AAG.