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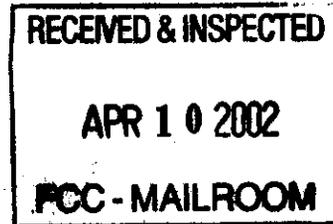
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April 3, 2002

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED



William F. Caton, Acting Secretary
 Federal Communications Commission
 Office of the Secretary
 445-12th Street, SW
 Washington, DC 20554

**Re: Petition for Rulemaking to Amend the FM Table of Allotments:
 Big Country of Missouri, Inc., licensee of KWRT, Boonville, MO**

Dear Mr. Caton:

Please find enclosed herewith an original and four (4) copies of a Petition for Rulemaking to Amend the FM Table of Allotments ("Petition for Rulemaking") submitted on behalf of Big Country of Missouri, Inc., licensee of FM Broadcast station KWRT, Boonville, Missouri.

The within filing is made out of an abundance of caution for the reasons set forth below in this letter.

The within Petition originally was filed on August 28, 2001. However, a letter, dated December 14, 2001 was received by our offices from John A. Karousos, Chief - Allocations Branch, advising that the Petition for Rulemaking was unacceptable for consideration due to a Petition for Review which was filed on behalf of Twenty One Sound Communications, Inc. in MM Docket 90-66. A copy of that letter is enclosed herewith for your convenience.

In response to the determination of Mr. Karousos regarding the Petition for Rulemaking as set forth in his letter of December 14, 2001, a Petition for Reconsideration was filed on behalf of the petitioner, Big Country of Missouri, Inc. The Petition for Reconsideration was delivered to the Capitol Heights, MD facility on January 11, 2002. However, as of the date herewith, the Allocations Branch is unable to confirm its receipt of the Petition for Reconsideration.

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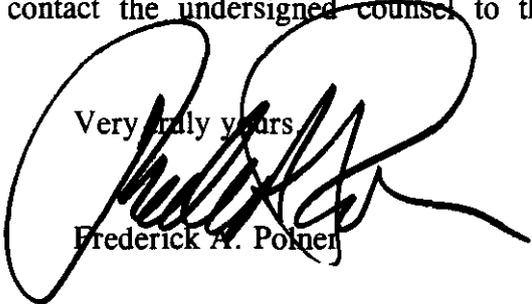
02-115

William F. Caton, Acting Secretary
Federal Communications Commission
April 3, 2002
Page 2

Given the backlog of documents at the Commission's Capitol Heights, MD facility, apparently due to the anthrax scare, I enclose herewith the abovementioned Petition for Rulemaking. I have also transmitted under separate cover an additional copy of the Petition for Reconsideration.

If you should have any questions, please contact the undersigned counsel to the Petitioner.

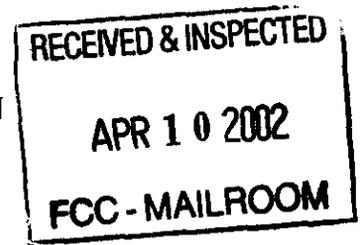
Very truly yours,


Frederick A. Polner

Enclosures

cc: Richard Billings (via facsimile w/o enclosures)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
(Boonville, Kansas City and Wheatland, MO)

}
}
}
}
}

MM Docket No. ____
RM - _____

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

PETITION FOR RULEMAKING

AND NOW COMES Big Country of Missouri, Inc. ("Petitioner"), licensee of FM Station KWRT, Boonville, Missouri, by and through its counsel, FREDERICK A. POLNER, ESQUIRE and ROTHMAN GORDON and hereby petitions the Federal Communication Commission (the "FCC" or the "the Commission") amend the Commission's Table of FM Allotments (Section 73.202(b) of the Commission's Rules) to (i) substitute Channel 226C3 for Channel 226A and modify the license of Station KWRT-FM to upgrade its facilities and specify operation on Channel 226C3 at Boonville, (ii) substitute Channel 227C0 for Channel 227C and modify the license of station KMXV at Kansas City accordingly, (iii) substitute Channel 271C0 for Channel 271C and modify the license of station KSRC at Kansas City accordingly, and (iv) to allot Channel 272A to Wheatland and substitute Channel 272A for vacant Channel 226A at Wheatland.

Grant of this petition will allow Petitioner to substantially increase the size and population of the KWRT-FM service area and would result in a more efficient use of the FM

spectrum which is consistent with the allotment criteria of Section 307(b) of the Communication Act of 1934, as amended (the "Act") and the technical assumptions underlying the Commission's rules. Endicott, New York, 51 FCC 2d 50, 51 (1975). Petitioner respectfully requests the Commission's consideration of Petitioner's request to upgrade service at 226A, Boonville, MO in accordance with the provisions of 47 CFR 1.420(g) as amended in the proceeding at MM Docket No. 85-313, RM-5037¹ In the Matter of Amendment of the Commissions Rules Regarding Modification of FM Broadcast Licenses to Higher Class Co-channel or Adjacent Channels, whereby licensees of FM Stations may upgrade their facilities on a higher class adjacent or co-channel frequency vis-à-vis a rulemaking petition to amend the FM Table of Allotments and the reclassification of KXMV and KSRC requested herein in accordance with the procedures set forth in In re: 1998 Biennial Regulatory Review FCC 00-368². In support hereof, the following is averred:

1. Petitioner's station currently provides service to an area of 2493.7 km which contains a population of 110,479 persons according to the 1990 U.S. Census. The city of Boonville, Missouri is listed with the United States Census Bureau with the following coordinates:

38° 57' 51" N
92° 44' 52" W

¹ 60 Rad. Reg 2d 114

² See FCC-00-368 at §26, MM Docket No. 98-93, Second Report and Order

Boonville is not located in any urbanized area and the predicted 70dBu contour of the proposed Channel 226C3 encompasses less than 50% of the Columbia, MO Urbanized Area. Channel 226C3 can be allocated to Boonville, MO at the new reference coordinates of:

38° 51' 17" N
92° 38' 17" W

The upgrade from Channel 226A to Channel 226C3 and the corresponding minor modification of the construction permit for Station KWRT-FM would enable Petitioner to continue to provide a 70 dBu service to all of Boonville in accordance with Section 73.315(a) of the Commission's Rules. The proposed Channel 226C3 operation would serve an area encompassing 4881.8 km which contains a population of 139,059 persons according to the 1990 U.S. Census. The resultant increase in service area of 2488.1 km represents an increase of 99.78% and the increase in population of 28,580 persons represents an increase of 25.87%. A digitally generated map, showing the predicted 60dBu and 70dBu contours of the proposed Channel 226C3 operation is included in the Engineering Statement and exhibits compiled by Wheeler Broadcast Consulting. A copy of the Engineering Statement and supporting exhibits is attached hereto as Exhibit "A" ("Technical Analysis").

2. Petitioner's proposal involves a change in class ("Upgrade") of Channel 226A and a specification of a new reference point: 38° 51' 17" N, 92° 38' 17" W, as shown on the attached Technical Analysis. This new reference point is fully spaced to all domestic allocations and operating stations, but for a short spacing to the Class C allocation of KMXV, Channel 227 at Kansas City, MO and the Class A allotment of Channel 226 to Wheatland, MO.

KMXV Reclassification

3. KMXV is licensed as a Class C FM radio station operating with 100 kW at 325 HAAT. The 325 meter HAAT falls below the Class C minimum HAAT of 451 meters³ by 126 meters. The Channel 226C3 Boonville operation proposed herein would be compliant with provisions of 47 CFR 73.207 if KMXV, Channel 227C, were to be reclassified as a Class C0 FM station. In the Commission's Second Report and Order in the proceeding MM Docket No. 98-93 (1998 Biennial Regulatory Review – Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules)⁴, the Commission opined that “reducing the “overprotection” of lesser facility Class C Stations is a reasonable and appropriate means to recover valuable FM spectrum and thereby create opportunities for new and/or improved FM service”. Further, the Commission reasoned that the overprotection of a majority of Class C stations stemmed from the assumption that all such Class C facilities are operating at the maximum facilities for its particular class, that “each station is currently, or at some future time will be, operating with maximum facilities”⁵. The Commission reasoned that FM Class C stations operating with antenna heights above average terrain of less than 451 meters receive interference protection in excess of their actual 60 dBu service contours. Such is the case with respect to KMXV which is currently operating at less than maximum facilities. Such overprotection, reasoned the Commission in its Second Report and Order, is inconsistent with the Commission's allocations standards and, as such, constitutes an inefficient use of the

³ See FCC-00-368 at §15, MM Docket No. 98-93, Second Report and Order

⁴ See FCC-00-368 at §16, MM Docket No. 98-93, Second Report and Order

⁵ See FCC-00-368 at §17, MM Docket No. 98-93, Second Report and Order

spectrum⁶. Accordingly, the purpose of Section 307(b) of the Act will best be served by amending the FM Table of Allotments to substitute Channel 227CO for Channel 227C and modifying the license of KMXV in such fashion.

Wheatland Channel Substitution

4. A full search of the Commission's April 28, 2001 database, conducted by Wheeler Broadcast Consulting and as set forth in the Technical Analysis appended hereto, indicates that Channel 272A can be substituted for Channel 226A at Wheatland, MO with a slight change in Wheatland's allocation reference coordinates, further provided that the Channel 271C operation of KSRC in Kansas City, MO is reclassified from Class C to Class C0. The Channel 272A operation at Wheatland, MO, as proposed herein, would continue to provide 70dBu service to that community and the shift in the allocation reference coordinates actually increases the population contained within the predicted 60 dBu contour. The new allocation reference coordinates for Channel 272A at Wheatland, MO, as proposed herein, are:

37° 58' 44" N
93° 26' 49" W

As allocated, service on Channel 226A at Wheatland would serve a population of 14,725 persons according to the 1990 U.S. Census and the Channel 272A substitute proposed herein would provide 60 dBu service to a population of 14,949 persons. As such, Channel 226A and 272A are equivalent⁷. A digitally generated map, showing the 60 and 70 dBu contours of the proposed Channel 272A substitute operation Wheatland, MO, demonstrating compliance with

⁶ See Docket 80-90, 97 FCC 2d at 282-283 (characterizing overprotection as a "waste of valuable spectrum resources which could be used to provide much needed service" elsewhere)

⁷ MM Docket No. 91-251

the principal community contour requirements of 47 CFR 73.315, is included in the Technical Analysis. Exhibit 5 to the Technical Analysis is a digitally generated map which shows the 60 dBu contours of both the existing Channel 226A allocation and the proposed 272A allocation, along with the protected service contours of an additional 14 radio stations which cover all or part of the loss area. Under the proposed circumstances, the loss of reception service resulting from the change in reference coordinates proposed herein is relatively small, sparsely populated, and generally adequately served area, and as such, is warranted in order to provide reception service to a significantly larger area with respect to KWRT-FM In Re: Charlotte Harbor, Marco, and Punta Gorda, Florida (DA94-1061)⁸. Also, the shift in the allocation reference coordinates proposed herein concurrent with a substitution of channels has been deemed acceptable by the Commission in recent proceedings⁹.

5. The allocation of Channel 226A to Wheatland, MO is the result of a rulemaking in proceeding, MM Docket No. 99-299 ("Clair Petition"). In that proceeding, The Clair Group, licensee of KMFC (FM), Centralia, Missouri, petitioned the Commission to make certain channel substitutions to accommodate modification of the license of KMFC to specify operation on Channel 221A with a full Class A effective radiated power of 6 kW. The substitutions requested in the Clair Petition included a substitution of Channel 262A for Channel 222A at Osceola, Missouri and a substitution of Channel 222A for Channel 221A at Sedalia, Missouri. In a counterproposal filed by Bott Communications, Inc., Bott petitioned the Commission to allot Channel 262A to Wheatland, as opposed to the substitution of Channel

⁸ See MM Docket No. 92-282, RM-8080, RM-8185

⁹ See MM Docket 00-107

262A for 222A at Osceola as proposed in the Clair Petition. In its Report and Order¹⁰, the Commission determined that the public interest would best be served by substituting Channel 262A for Channel 222A at Osceola, inter alia, and contrary to the request of Botts in its counterproposal, allotted Channel 226A at Wheatland, MO, with a site restriction 14.3 kilometers east of the community. It is significant to the captioned matter, however, that the channel had remained vacant since the Commission's rulemaking in the Clair Petition.

6. The substitution of Channel 272A for 226A, as proposed by Petitioner and the corresponding shift in reference coordinates would result in a more efficient use of the FM spectrum and continue to provide city grade service to Wheatland, MO. This, too would further the mandate set forth in Section 307(b) of the Act. The Commission has previously ruled in proceedings in which a substitution of a vacant allotment was proposed to accommodate a co-channel upgrade, as requested herein, that such a substitution is characteristic of an efficient use of the spectrum. In re: Columbia, Bourbon, Leasburg, Gerald, Dixon and Cuba, Missouri (DA95-2250)¹¹. Under the proposed circumstances, the loss of reception service resulting from the change in reference coordinates proposed herein is relatively small, and the loss area sparsely populated and generally adequately served area, and as such, is warranted in order to provide reception service to a significantly larger area with respect to KWRT-FM¹². Also, the shift in the allocation reference coordinates proposed

¹⁰ Report and Order, adopted August 8, 2000 and Released August 18, 2000, RM-9687 and RM-9813

¹¹ See MM Docket No.92-214,MM Docket No. 99-293, MM Docket No. 97-178

¹² See MM Docket No.92-282, RM-8185

herein concurrent with a substitution of channels has been deemed acceptable by the Commission in recent proceeding¹³.

KSRC Reclassification

7. As stated herein, Channel 272A can be substituted for Channel 226A at Wheatland, MO with a slight change in the allocation reference coordinates provided that the Channel 271C operation of KSRC in Kansas City, MO is reclassified from Class C to Class CO.

8. KSRC is licensed at 100 kW ERP with an antenna HAAT of 305 meters. Infinity Radio License, Inc., the licensee of KSRC has a pending application¹⁴ which seeks to upgrade the facilities to a tower height of 341 meters HAAT. In either case, as licensed or proposed, Channel 271C at Kansas City, MO will operate with less than maximum facilities which fall below the Class C minimum HAAT of 451 meters¹⁵. In the proceeding in re: Docket No. 98-93, the Commission reasoned that FM Class C stations that are operating with antenna heights above average terrain of less than 451 meters receive interference protection in excess of their actual 60 dBu service contours. Such is the case with respect to KSRC which is operating at less than maximum facilities. Such overprotection reasoned the Commission in its

¹³ See MM Docket 00-1

¹⁴ BPH-20010103AAH

¹⁵ See FCC-00-368, MM Docket No. 98-93, Second Report and Order

Second Report and Order, is inconsistent with the Commission's allocations standards and, as such, constitutes an inefficient use of the spectrum¹⁶.

9. As Petitioner avers herein, the public interest is served by adopting the proposed Channel 226C3 upgrade at Boonville, MO, the reclassification of Channels KSRC and KMXV to C0 classifications, and the deletion of Channel 226A from the FM Table of Allotments and substitution thereof with Channel 272A (along with the shift in allocation of reference coordinates). As proposed herein, the total service of no existing radio station will be reduced and more efficient use of the FM spectrum will result. It is, therefore, respectfully requested that 47 CFR 73.202(b) be amended as follows:

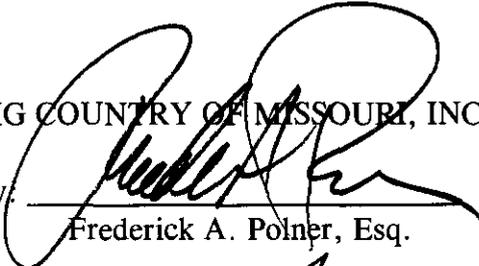
Community of License	Present Allocation(s)	Proposed Allocation(s)
Boonville, Missouri	226A, 257C2	226C3, 257C2
Kansas City, Missouri	227C, 235C, 243C, 259C, 271C, 277C, 282C	227C0, 235C, 243C, 259C, 271C0, 277C, 282C
Wheatland, Missouri	226A	272A

¹⁶ See Docket 80-90, 97 FCC 2d at 282-283 (characterizing overprotection as a "waste of valuable spectrum resources which could be used to provide much needed service" elsewhere)

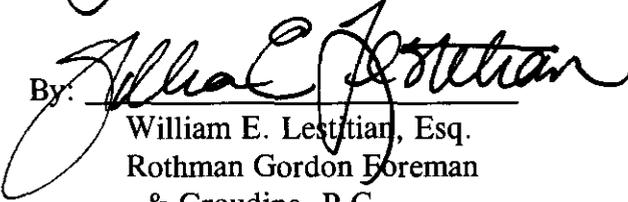
10. Petitioner hereby certifies that no alternative channel is available for the proposed service; and, that it is prepared to upgrade its facilities and apply for FM radio station on Channel 226C3 in Boonville, MO should such allotment be made as a result of this rule making. When and if said application is granted, Petitioner will proceed to upgrade its facilities without delay and will promptly commence service on the new allotment.

Respectfully submitted,

BIG COUNTRY OF MISSOURI, INC.

By: 

Frederick A. Polner, Esq.

By: 

William E. Lestitian, Esq.
Rothman Gordon Foreman
& Groudine, P.C.
3rd Floor Grant Building
Pittsburgh, PA 15219
(412) 338-1111

Its Attorney

Dated: April 3, 2002

CERTIFICATE OF SERVICE

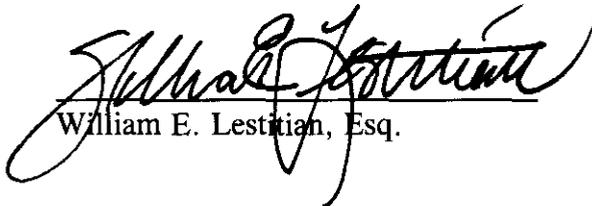
I hereby certify that a true and correct copy of the foregoing PETITION FOR RULEMAKING was deposited this 3rd day of April, 2002, in the U.S. Mail, properly addressed to the following:

Licensee of FM Radio Station KMXV

Infinity Radio License, Inc.
600 New Hampshire Avenue
N.W. Suite 1200
Washington, D.C. 20037

Licensee of FM Radio Station KSRC

Infinity Radio License, Inc.
600 New Hampshire Avenue
N.W. Suite 1200
Washington, D.C. 20037



William E. Lestitian, Esq.

Dated: April 3, 2002



WHEELER BROADCAST CONSULTING

Engineering Statement

Amendment to 47 CFR 73.202(b)
Boonville, Wheatland, and Kansas City, MO

This consultant has been retained by Big Country of Missouri, Inc., Licensee of KWRT-FM in Boonville, MO, for the purpose of preparing technical support to its request that Commission amend the FM Table of Allotments, 47 CFR 73.202(b) so as to upgrade KWRT-FM from Channel 226 A to Channel 226 C3. This report details how such an upgrade is possible and how the public interest is best served by doing so.

Boonville, MO

The city of Boonville is listed with the United States Census Bureau with the coordinates of:

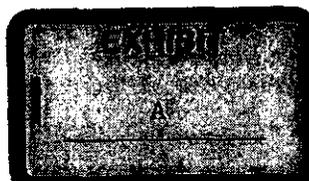
38° 57' 51" N
92° 44' 52" W

Boonville is not located in any urbanized area and the predicted 70 dBu contour of the Channel 226 C3 reference facility proposed herein encompasses less than 50% of the Columbia, MO Urbanized Area. Channel 226 C3 can be allocated to Boonville, MO at the reference coordinates of:

38° 51' 17" N
92° 38' 17" W

save a short spacing to the Class C allocation of KMXV, Channel 227 C in Kansas City, MO and the Channel 226 A allocation at Wheatland, MO. Boonville, MO is located 15.4 km NW from the proposed allocation point at a bearing of 321.9°. A search of the Commission's April 28, 2001 database showing the availability of Channel 226 C3 at Boonville, MO is included in this report as Exhibit 1 and a digitally generated map, showing the predicted 60 dBu and 70 dBu contours of the Channel 226 C3 reference operation is included in this report as Exhibit 2.

6025 MARTWAY
SUITE 112
MISSION, KS 66202
913.362.7282
913.362.7287



Boonville, MO - continued

As shown in Exhibit 2, the city of Boonville continues to receive 70 dBu service from the proposed allocation reference operation.

KMXV, Channel 227C

KMXV is licensed as a Class C FM radio station operating with 100 kW at 325 meters HAAT. The 325 meter HAAT falls below the Class C minimum HAAT of 450 meters¹ by 125 meters. The Channel 226 C3 Boonville operation proposed herein is compliant with the provisions of 47 CFR 73.207 when KMXV, Channel 227, is reclassified as a Class C0 fm station. Accordingly, it is proposed that Channel 227 C0 be substituted for Channel 227 C in Kansas City, MO as a part of this request.

Channel 226 A, Wheatland, MO

A full search of the Commission's April 28, 2001 database reveals that Channel 272 A can be substituted for Channel 226 A at Wheatland, MO with a slight change in the allocation reference coordinates provided that the Channel 271 C operation of KSRC in Kansas City, MO is reclassified from Class C to Class C0. KSRC is licensed at 100 kW ERP with an antenna HAAT of 305 meters and they have a pending application, BPH-20010103AAH, which seeks 100 kW at an antenna HAAT of 341 meters. In either case, as licensed or as proposed, Channel 271 C in Kansas City, KSRC, will operate with facilities which fall below the Class C minimum HAAT of 450 meters. New allocation reference coordinates for Channel 272 A at Wheatland, MO are:

37° 58' 44" N
93° 26' 49" W

The Channel 272 operation at Wheatland, MO would continue to provide 70 dBu service to that community and the shift in allocation reference coordinates actually increases the population contained within the predicted 60 dBu contour. The Channel 226 operation at Wheatland serves a population of 14,725 persons according to the 1990 US Census and the Channel 272 substitute proposed herein provides 60 dBu service to population of 14,949 Persons.

¹ See FCC-00-368 at §15.

As such, the channels are equivalent. A search of the Commission's April 28, 2001 FM database, detailing the availability of Channel 272 A at Wheatland, MO is included in this report as Exhibit 3. A digitally generated map, showing the 60 and 70 dBu contours of the proposed Channel 272 A substitute operation at Wheatland, MO, demonstrating compliance with the principal community contour requirements of 47 CFR 73.315, is included in this report as Exhibit 4. Exhibit 5 is a digitally generated map which shows the 60 dBu contours of both the existing Channel 226 A allocation and the proposed Channel 272 A substitute allocation along with the protected service contours of an additional 14 radio stations which cover all or part of the loss area². As shown in Exhibit 5, there is no area contained within the loss area that is either white area or gray area.

KWRT-FM

KWRT-FM in Boonville, MO, as licensed on Channel 226 A serves an area of 2493.7 km² which contains a population of 110,479 persons according to the 1990 US Census. The proposed Channel 226 C3 operation in contrast would serve an area encompassing 4981.8 km² which contains a population of 139,059 persons according to that same Census. The increase in service area of 2488.1 km² represents an increase of 99.78% and the increase in population of 28,580 persons represents an increase of 25.87%³. The public interest is thus served by adopting the Channel 226 C3 upgrade as proposed herein.

Summary

As shown above, the public interest is served by adopting the proposed Channel 226 C3 upgrade at Boonville, MO. KWRT-FM can provide an additional aural service to an area of 2488.1 km² which contains a population of 28,580 Persons. This while not reducing the total service of any other existing radio stations. It is therefore respectfully requested that 47 CFR 73.202(b) be amended as follows:

² No shown in Exhibit 5 is the 0.5 mV/m contour of KBNN in Lebanon, MO which exceeds the scale of the map.

³ All area and population determinations were made by employing 360 equally spaced radials and are based on 8 radial HAAT calculations.

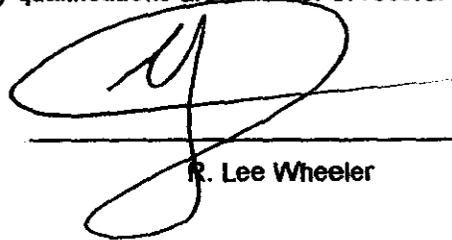
Community	Present Allocations	Proposed Allocations
Boonville, MO	226A, 257C2	226C3, 257C2
Kansas City, MO	227C, 235C, 243C, 259C, 271C, 277C, 282C	227C0, 235C, 243C, 259C, 271C0, 277C, 282C
Wheatland, MO	226A	272A

Certification

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

06/22/01

Date

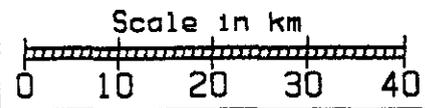
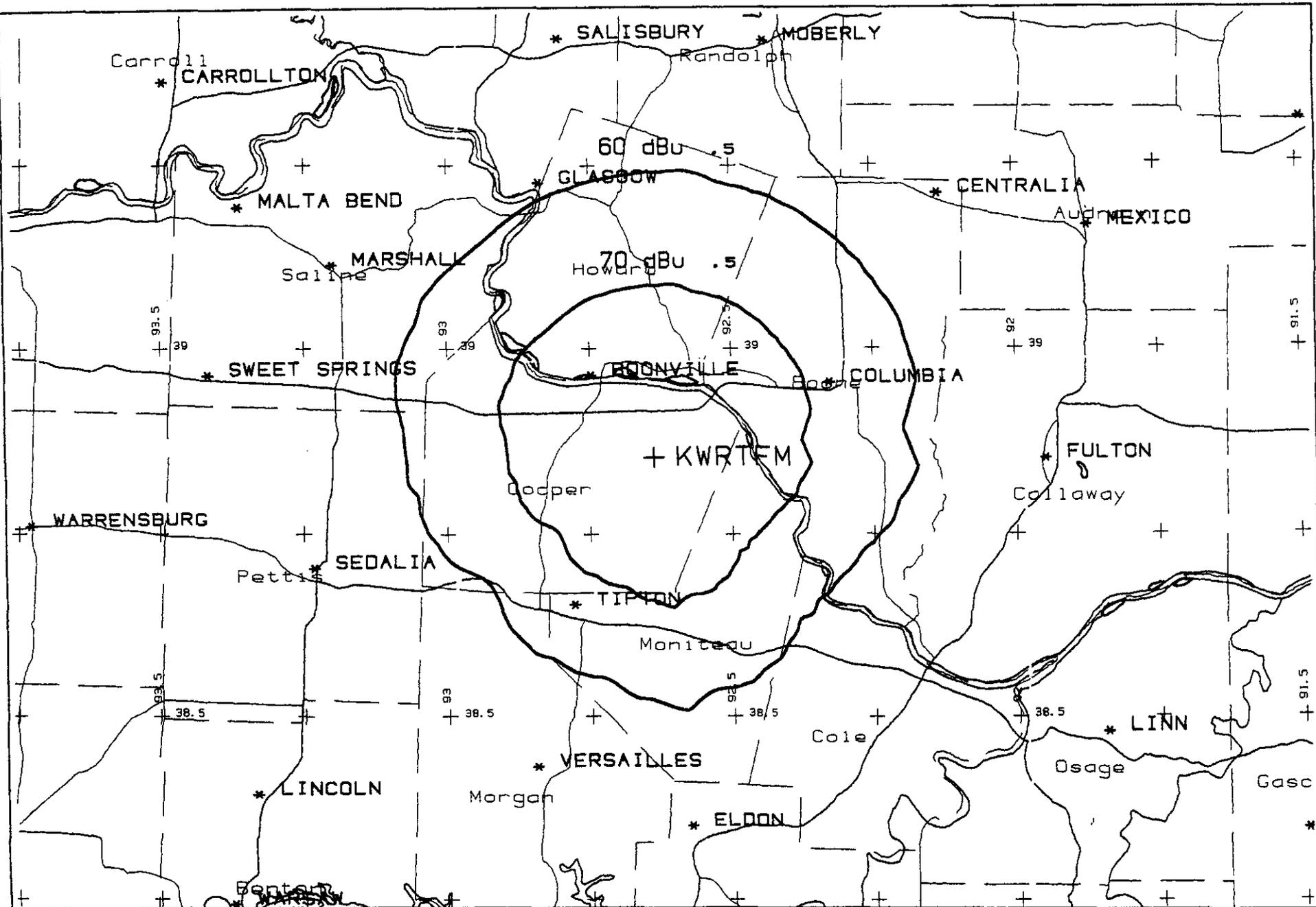


R. Lee Wheeler

KWRT-FM
Class C3 Allocation Point

REFERENCE	CLASS = C3	DISPLAY DATES
38 51 17 N	Current Spacings	DATA 04-28-01
92 38 17 W	Channel 226 - 93.1 MHz	SEARCH 05-23-01

Call N. Lat.	Channel W. Lng.	Location	Power	Dist	Azi HAAT	FCC	Margin
KWRTFM CP 38 56 31	226A 92 34 32	Boonville CX	MO 3.800 kW	11.09	29.2 126 M	142.0	-130.91
Big Country Of Missouri, I BMPH20001010AIF							
KWRTFM LIC 38 56 31	226A 92 34 32	Boonville C	MO 3.800 kW	11.09	29.2 126 M	142.0	-130.91
Big Country Of Missouri, I BLH20000705ACA							
RADD ADD 37 55 00	226A 93 14 30	Wheatland	MO 6.000 kW	116.73	206.9 100 M	142.0	-25.27
RM							
KMXV LIC 39 00 57	227C0 94 30 24	Kansas City CN	MO 100.000 kW	163.00	276.9 325 M	163.0	0.00
Inifinity Radio License In BLH19870318KG							
KGRC LIC 39 43 48	225C1 91 24 19	Hannibal C	MO 100.000 kW	144.06	47.1 153 M	144.0	0.06
Staradio Corporation BLH20001218AAF							
KLOZ LIC 38 20 27	224C2 92 35 33	Eldon CN	MO 31.000 kW	57.20	176.0 189 M	56.0	1.20
Benne Broadcasting Company BLH19890828KE							
KRMSFM CP 38 09 52	228C2 92 36 12	Osage Beach CN	MO 39.000 kW	76.70	177.7 168 M	56.0	20.70
Viper Communications, Inc. BPH19980720IJ							
KRMSFM LIC 38 07 29	228A 92 40 39	Osage Beach CN	MO 3.300 kW	81.12	182.4 91 M	42.0	39.12
Viper Communications, Inc. BMLH19900102KD							
KNSX LIC 38 06 16	227C2 91 02 30	Steelville CN	MO 8.500 kW	162.31	120.5 356 M	117.0	45.31
Twenty-one Sound Communica BLH19961002KF							
KAYX LIC 39 11 14	223A 93 50 03	Richmond CN	MO 2.350 kW	109.95	290.1 163 M	42.0	67.95
Bott Communications, Inc. BLH19900806KC							
RADD ADD 39 21 59	280C3 93 24 12	Malta Bend	MO 25.000 kW	87.21	311.0 100 M	14.0	73.21
RM10017							
RADD ADD 39 21 59	280C3 93 24 12	Malta Bend	MO 25.000 kW	87.21	311.0 100 M	14.0	73.21
RM9909							



KWRTFM 226C3 25kW
 N. Lat. 38 51 17 W. Lng. 92 38 17

EXHIBIT 2
 LEE WHEELER - 05/01

Alternate Channel
Wheatland MO

REFERENCE
37 58 44 N
93 26 49 W

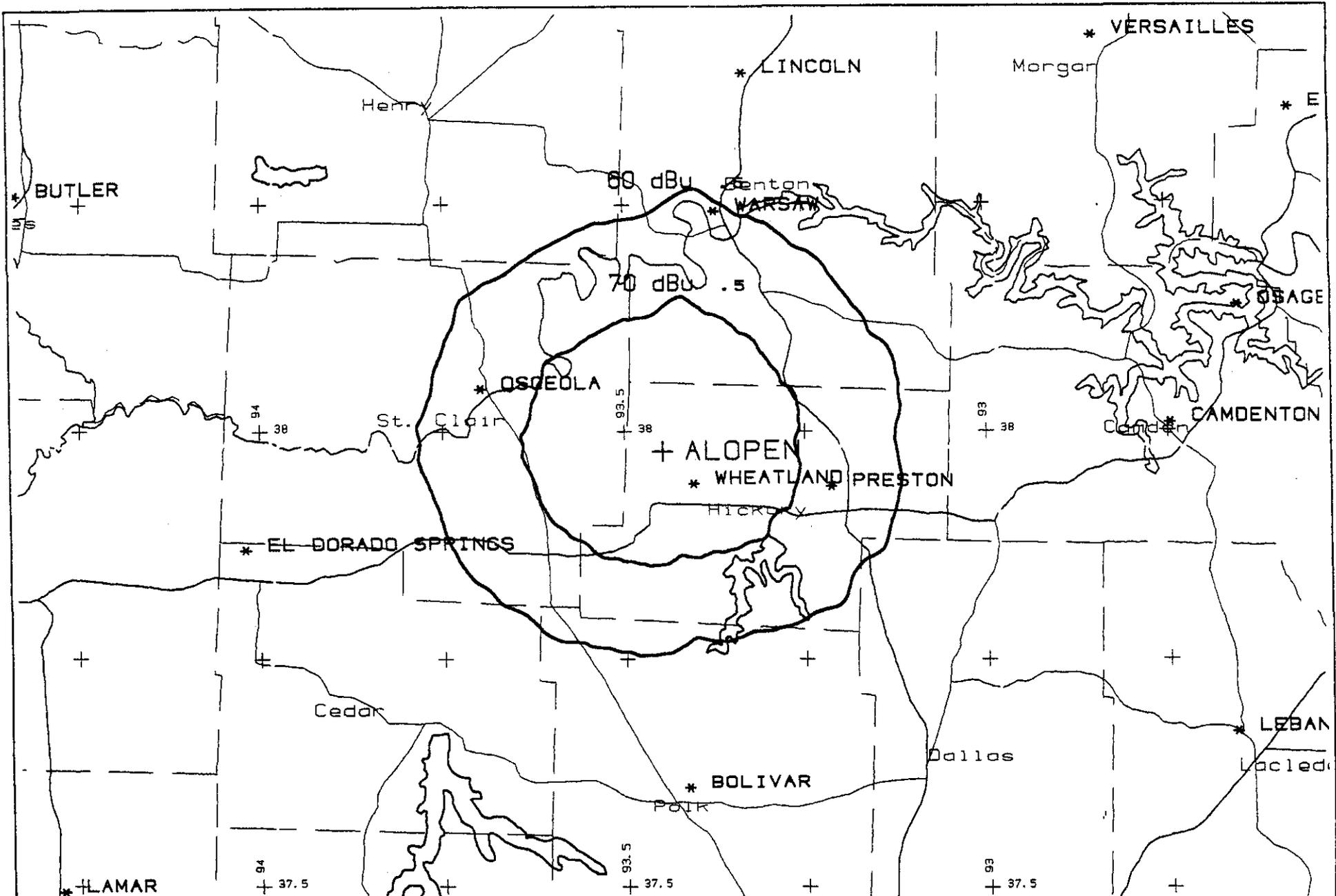
CLASS = A
Current Spacings

DISPLAY DATES
DATA 04-28-01
SEARCH 05-23-01

----- Channel 272 - 102.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
KJPWFM LIC 272A	Waynesville	MO	115.30	98.5	115.0	0.30
37 49 09	92 09 06 CN	1.000 kW	146 M			
	Pulaski County Broadcaster	BLH4023				
KJPWFM CP 272A	Waynesville	MO	115.30	98.5	115.0	0.30
37 49 09	92 09 06 CN	2.650 kW	150 M			
	Pulaski County Broadcaster	BPH19960306IA				
KSRC.A APP 271C0	Kansas City	MO	152.34	324.5	152.0	0.34
39 05 26	94 28 18 CX	100.000 kW	341 M			
	Inifinity Radio License In	BPH20010103AAH				
KSRC LIC 271C0	Kansas City	MO	157.36	320.9	152.0	5.36
39 04 20	94 35 45 CN	100.000 kW	305 M			
	Inifinity Radio License In	BLH19850712KQ				
KIXQ LIC 273C1	Joplin	MO	139.03	224.3	133.0	6.03
37 04 43	94 32 26 CN	100.000 kW	125 M			
	Big Mack Broadcasting, Inc	BLH19830624AB				
KBXR LIC 272C3	Columbia	MO	153.80	41.2	142.0	11.80
39 00 52	92 16 32 C	3.500 kW	261 M			
	Ft. Smith Fm, Inc.	BLH20000208ABM				
960212 APP 271A	Brookline	MO	88.10	173.2	72.0	16.10
37 11 27	93 19 44 CX	6.000 kW	95 M			
	Mw Springmo, Inc.	BMPH20010214ACL				
960212 CP 271A	Brookline	MO	88.31	167.7	72.0	16.31
37 12 06	93 14 01 CN	5.500 kW	105 M			
	Mw Springmo, Inc.	BPH19960212MD				
KBMX.A APP 270C2	Eldon	MO	82.62	65.8	55.0	27.62
38 16 49	92 35 07 CN	48.000 kW	154 M			
	Lake Broadcasting, Inc.	BPH19930922IE				
ALLO VAC 270C2	Eldon	MO	82.62	65.8	55.0	27.62
38 16 49	92 35 07	50.000 kW	150 M			
		RM9619				
RADD ADD 270C2	Eldon	MO	82.62	65.8	55.0	27.62
38 16 49	92 35 07	50.000 kW	150 M			
		RM7935				
KQUL LIC 274A	Lake Ozark	MO	76.81	85.1	31.0	45.81
38 02 06	92 34 31 CN	6.000 kW	100 M			
	Benne B/co Co. Of Lake Oza	BLH19940516KZ				
KCVOFM LIC 219C3	Camdenton	MO	60.73	85.4	12.0	48.73
38 01 13	92 45 27 CN	10.000 kW	133 M			
	Lake Area Educ B/cng Found	BLED19930420KE				
KBMX LIC 270A	Eldon	MO	82.62	65.8	31.0	51.62
38 16 49	92 35 07 CN	2.250 kW	166 M			
	Lake Broadcasting, Inc.	BMLH19900122KG				
RDEL DEL 270A	Eldon	MO	82.62	65.8	31.0	51.62
38 16 49	92 35 07	6.000 kW	100 M			

Call N. Lat.	Channel W. Lng.	Location	Power	Dist HAAT	Azi	FCC	Margin
RDEL 38 16 49	DEL 270A 92 35 07	Eldon	MO 6.000 kW RM6701	82.62 100 M	65.8	31.0	51.62
KMMOFM 39 08 03	LIC 275C1 93 13 19	Marshall CN	MO 100.000 kW	129.72 116 M	8.6	75.0	54.72
		Missouri Valley Broadcasti	BLH19931213KB				
KHST.A 37 25 27	APP 269A 94 16 12	Lamar CN	MO 3.000 kW	95.18 100 M	229.8	31.0	64.18
		Innovative Broadcasting Co	BMLH19970411KB				
ALLO 37 25 27	VAC 269A 94 16 12	Lamar	MO 6.000 kW	95.18 100 M	229.8	31.0	64.18
KHST 37 25 27	LIC 269A 94 16 12	Lamar C	MO 6.000 kW	95.18 100 M	229.8	31.0	64.18
		Innovative Broadcasting Co	BMLH19981105KF				
KMMOFM 39 17 49	APP 275C1 93 13 20	Marshall CX	MO 100.000 kW	147.60 299 M	7.5	75.0	72.60
		Missouri Valley Broadcasti	BPH20000811AAQ				
RADD 39 17 49	ADD 275C1 93 13 20	Marshall Z	MO 100.000 kW RMks153	147.60 299 M	7.5	75.0	72.60
RADD 37 49 09	ADD 274C3 92 09 06	Waynesville	MO 25.000 kW RM6701	115.30 100 M	98.5	42.0	73.30

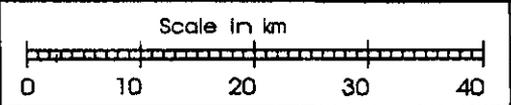
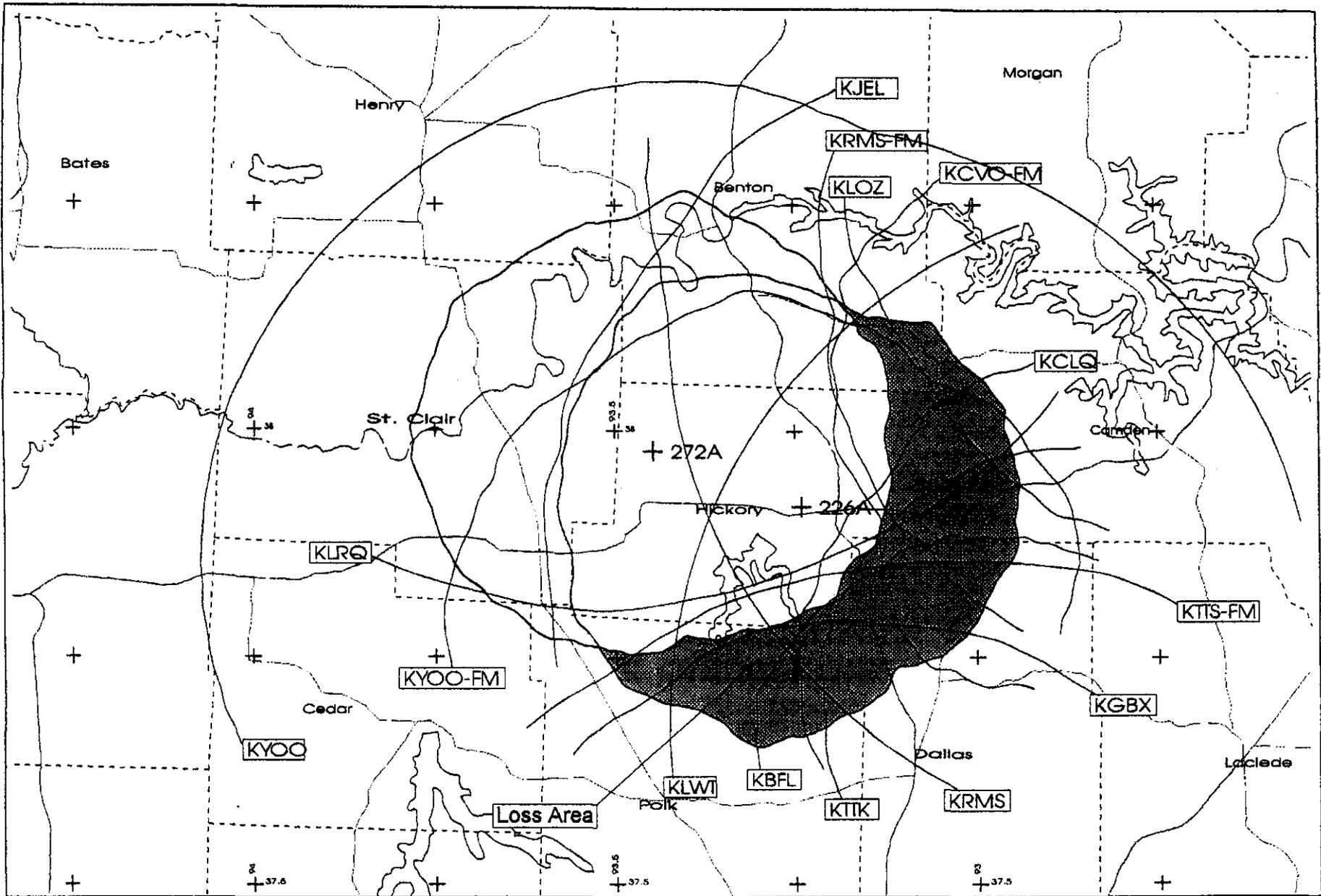


Alternate Wheatland Allocation 272A

N. Lat. 37 58 44 W. Lng. 93 26 49

EXHIBIT 4

LEE WHEELER - 05/01



Additional Aural Services in Loss Area - Wheatland, MO
 N. Lat. 37 58 44 W. Lng. 93 26 49

EXHIBIT 5
 LEE WHEELER - 05/01



Federal Communications Commission
Washington, D.C. 20554

December 14, 2001

Frederick A. Polner
Rothman Gordon Foreman
& Groudine, P.C.
3rd Floor Grant Building
Pittsburgh, Pennsylvania 15219

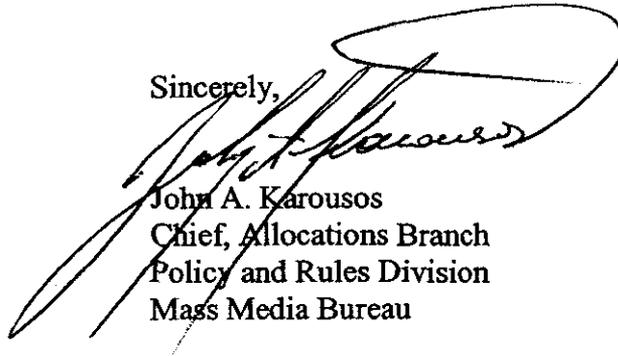
Dear Mr. Polner:

This is in response to the Petition for Rule Making you filed on behalf of Big Country of Missouri, Inc. requesting changes to the Commission's FM Table of Allotments for communities in Missouri. Your request for rule making is unacceptable for consideration at this time.

Specifically, you request the substitution of Channel 226C3 for Channel 226A at Boonville, Missouri, and modification of the license for Station KWRT-FM; substitution of Channel 227C0 for Channel 227C at Kansas City, Missouri, and modification of the license for Station KMXV; substitution of Channel 271C0 for Channel 271C at Kansas City, Missouri, and modification of the license for Station KSRC; and substitution of Channel 272A for vacant Channel 226A at Wheatland, Missouri. Our engineering analysis indicates that although the substitutions you request at Kansas City and Wheatland to accommodate Channel 226C3 at Boonville are in compliance with Commission Rules, Channel 226C3 at your specified site (38-51-17 and 92-38-17) is short-spaced to the proposed allotment of Channel 227C1 at Steelville, Missouri, and the counterproposal deadline in that proceeding has long passed. The allotment of Channel 227C1 at Steelville, Missouri, is the subject of a pending Application for Review filed by Twenty One Sound Communications, Inc., against the Commission's action in MM Docket 90-66. See 7 FCC Rcd 3015 (1992), recon denied, 11 FCC Rcd 6372 (1996) and 12 FCC Rcd 4987 (1997). Briefly, Twenty One Sound Communications, Inc. filed a counterproposal requesting the substitution of Channel 227C1 for Channel 227C2 at Steelville and modification of the construction permit for Station KNSX(FM), substitution of Channel 265A for Channel 228A at Osage Beach, Missouri, and the substitution of vacant Channel 283A for Channel 264A at Doolittle, Missouri. The Report and Order denied the counterproposal, and instead substituted Channel 228C3 for Channel 228A at Osage Beach, Missouri, and substituted Channel 253A for Channel 229A at Warsaw, Missouri.

Based on the above discussion, we are returning your proposal for Boonville, Kansas City and Wheatland, Missouri. Upon termination of MM Docket No. 90-66, you may resubmit your petition provided you make a showing that a fully spaced transmitter site is available and it is no longer necessary to protect Channel 227C1 at Steelville. In the alternative, you may wish to determine if other channels are available that are not contingent on the outcome of MM Docket 90-66.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Karousos", is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Enclosure