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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 6, 2002

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St., S.W., TW-A325
Washington, DC 20554

**Re: PETITION FOR RULEMAKING
In the Matter of Amendment of 73.202(b)
Table of Allotments, FM Broadcast Stations
Montgomery and Marmet, West Virginia**

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), licensee of WZKM(FM), Montgomery, West Virginia, submitted herewith in triplicate is an engineering statement in support of its pending Petition for Rulemaking to amend the FM Table of Allotments to reallocate Channel 227 from Montgomery, West Virginia, to Marmet, West Virginia and to modify the license of WZKM(FM) to specify Marmet as its community of license.

Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Amy L. Van de Kerckhove

Enclosures

cc: John A. Karousos - FCC

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Educational Media Foundation

**Engineer Statement
In Support of
Petition for Rulemaking**

Proposed Marmet, WV Allocation

August 29, 2002

PURPOSE AND SCOPE

The Petition of which this Statement is to become a part, requests a modification of the FM Table of Allotments in 47 C.F.R. 73.202(b) to change the Community of License of WZKM(FM), 227A, Montgomery, WV to Marmet, WV.

ALLOTMENT COORDINATES

The allotment coordinates of Channel 227A at Montgomery, WV are N38-13-09, W81-25-05. No change of these coordinates is required, and this Petition requests none.

70 dBu COVERAGE OF MARMET, WV

The community of Marmet, WV is located at N38-14-47, W81-34-11 at a distance of 13.6 km from the allotment site, which is also the current WZKM transmitter site. A full Class A facility (6kW at 100m HAAT) at the allotment site results in a HAAT of 179 meters toward Marmet, WV.

The 70 dBu f(50,50) contour from the allotment site at maximum Class A facilities, in the direction of Marmet, WV, lies at a distance of 21.8 km and encompasses the entire community of Marmet.

The 70 dBu f(50,50) contour from the transmitter site of WZKM at its licensed power and HAAT, in the direction of Marmet, WV, lies at a distance of 20.9 km and encompasses the entire community of Marmet.

AURAL SERVICES IN MONTGOMERY, WV

Montgomery, WV, currently has two licensed aural services:

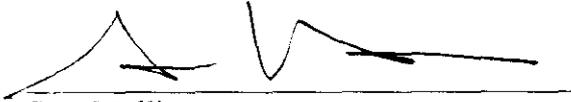
WZKM (FM)	227A
WMON (AM)	1340 kHz

AURAL SERVICES IN MARMET, WV

There are no aural services currently licensed to Marmet, WV. WZKM will become the first aural service licensed to that community.

CERTIFICATION:

It is believed that all methods employed in making the determinations contained within this Engineering Statement were in accordance with applicable FCC Rules and Regulations and good engineering practice.

A handwritten signature in black ink, appearing to read 'Sam Wallington', written over a horizontal line.

Sam Wallington
Director of Engineering
Educational Media Foundation