

Engineering Statement
prepared for
Access.1 Communications-Shreveport, L.L.C.

Introduction

The following Engineering Statement was prepared on behalf of Access.1 Communications-Shreveport, L.L.C. in support of its comments to the Notice of Proposed Rulemaking to allot Channel 300C2 to Oil City, Louisiana (MB Docket No. 02-199, RM-10514) released August 2, 2002.

Magnolia will be without full time aural service

In its Petition for Rulemaking, Columbia Broadcasting Company (“Columbia”) proposes to delete the Channel 300C1 allotment for KVMA-FM at Magnolia, Arkansas and replace it with a downgraded allotment at Oil City, Louisiana, some 65 kilometers distant. Columbia states that Magnolia will “retain local aural service”. KVMA(AM), a Class D AM station with no protected night time service, would be the only remaining broadcast station licensed to Magnolia, Arkansas.

KVMA(AM) is, however, licensed to operate with 0.03 kW (30 Watts) at night. The Nighttime Interference Free contour for KVMA(AM) is 21.9 mV/m. This contour extends 2.21 km from the transmitter site, located at the north edge of the city. The 21.9 mV/m nighttime interference free contour encompasses 3,614 people (2000 U.S. Census) and 15.3 km², 3,514 persons and 8.5 km² of which are within the bounds of the city of Magnolia. Consequently, only 32% of the population and 35% of the area of the city of Magnolia presently receives nighttime local aural service from KVMA(AM). In the Section 73.24(i) of the AM Rules, a station is required to provide nighttime interference free service to more than 80% of its community. While Class D AM stations are exempt from this nighttime service requirement, the rule nevertheless establishes the minimum level of community coverage considered adequate by the Commission. In addition, changes by other stations, which are co-channel or first-adjacent to KVMA(AM) are not required to protect the KVMA(AM) nighttime operation, could reduce the KVMA(AM) nighttime interference-free service area even further.

For this reason, the removal KVMA-FM would leave Magnolia, Arkansas *without* a full time aural broadcast service.

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Under-served Area

The proposed allotment of Channel 300C2 to Oil City, Louisiana would create several “gray” areas (areas which would receive less than 5 aural broadcast services).

Specifically, from the location specified in the proposed Rulemaking, there will be 162.1 sq. km. of area with a population of 2,030 persons that would be left with only 4 aural services and a very small area, 4.8 sq. km. and 9 persons, that would be left with only 3 aural services. The 60 dB μ contours of all FM stations *and* the daytime 2 mV/m contours of all AM stations were used in this analysis.

Class C1 Facility at Magnolia

The gain/loss coverage area and population in Columbia’s Proposed Rulemaking were calculated based on a maximum Class C2 facility at Oil City and compared to the licensed facilities of KVMA-FM. KVMA-FM is currently licensed to operate with facilities which are only slightly larger than the *minimum* required for a Class C1. In order to make a valid comparison between the Magnolia and the proposed Oil City allotments, a full Class C1 facility at Magnolia (100 kW at 299m HAAT) must be considered instead of the minimal facilities currently licensed to KVMA-FM.

Considering KVMA-FM as a maximum Class C1 facility (100 kW at 299m HAAT)¹ results in the a potential loss area of 12,130 sq. km. with a corresponding gain of only 4,340 sq. km. Using this comparison, the gray areas also increased in size and population. The areas with only 3 remaining services is now 5.6 sq. km. populated by 9 persons, while the areas with only 4 remaining services increases to 413 sq. km. populated by 14,594 persons (2000 Census data).

Removing the Channel 300C1 allotment at Magnolia, Arkansas would deprive 14,594 people, most of which are located in and around Hope, Arkansas, from potentially having 5 aural broadcast services and thus prevent them from being “well-served.”

¹ The hypothetical maximum Class C1 facility was based on the following parameters: 100 kW ERP, 299 m HAAT, 391.1 m above mean sea level, located at the KVMA-FM licensed coordinates of 33° 17' 59" N, 93° 13' 57" W.

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Coverage of Urbanized Area

An analysis of the proposed facility's coverage of the Shreveport Urbanized Area² (population: 274,445, 2000 US Census) was made to determine if the Commission's urban migration criteria (established in Faye and Richard Tuck, 3 FCC Rcd 5347, 1988) would be triggered. This analysis shows that the full Class C2 facility located at the allotment coordinates would cover only 0.3% of the Shreveport Urbanized Area.

However, In examining the allocations constraints on the resulting Oil City allotment, it can be shown that an actual Channel 300C2 facility licensed to Oil City could be readily moved from the proposed allotment coordinates to a location some 30 km farther to the Southwest (and closer to Shreveport). Specifically, a fully spaced Channel 300C2 facility could be located on an existing tower located to the Northwest of Shreveport³. A hypothetical Class C2 facility from this location could provide 70 dBμ coverage of the entire community of Oil City while also providing coverage into 62% of the Shreveport Urbanized Area.

Accordingly, this hypothetical facility would have even less coverage overlap with the existing licensed facility at Magnolia than that of a facility located at the proposed allotment location, which would further increase the "loss" area around Magnolia, Arkansas.

Downtown Oil City, Louisiana is situated 91 kilometers south and west of the downtown area of the city of Magnolia, Arkansas. However, downtown Oil City is only 39 kilometers north and west of downtown Shreveport, Louisiana. The distance from the closest point in Oil City to the closest point of the city of Shreveport is less than 22 kilometers.

² 2000 U.S. Census Urbanized Area boundaries used in this analysis were obtained from the Department of Commerce, U.S. Census Bureau Cartographic Boundary Files web site.

³ The coordinates used in this allocations study are those of an existing tower occupied by KTBS-TV (Ch 3, Shreveport, LA), KTBS-DT (Ch 28, Shreveport, LA), and KRMD-FM (Ch 266C, Shreveport, LA).

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Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Rhodes is a senior engineer in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in the Commonwealth of Virginia, holds a Bachelor of Science degree from Virginia Polytechnic Institute and State University (VPI), and has submitted numerous engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with the Commission.



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