

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

In the Matter of

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Georgetown, Mason, Oxford and)
West Union, Ohio, and Salt Lick, Kentucky)

MAR 23 2004

MB Docket No. _____
RM - _____
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

PETITION FOR RULE MAKING

RICHARD L. PLESSINGER, SR.

BALOGH BROADCASTING COMPANY, INC.

35 Island Drive #16
Eastpoint, FL 32328
513-218-1843

Harry C. Martin
Fletcher Heald & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209
703-812-0415

Its Counsel

DREAMCATCHER COMMUNICATIONS, INC.

Of Counsel:

Mark N. Lipp
Scott Woodworth
Vinson & Elkins, L.L.P.
1455 Pennsylvania Ave, NW
Suite 600
Washington, DC 20004
202-639-6500

Coe W. Ramsey
Brooks Pierce McLendon Humphrey & Leonard, LLP
PO Box 1800
Raleigh, NC 27602
919-839-0300

Its Counsel

March 23rd, 2004

No. of Copies rec'd 014
List ABCDE
MB 04-59

TABLE OF CONTENTS

	<u>Page</u>
I. Station WOXY(FM), Oxford to Mason, Ohio	2
A. Technical Analysis	2
B. Change in Community of License Criteria	2
II. Station WAXZ(FM), Georgetown, Ohio to Salt Lick, Kentucky	8
A. Technical Analysis	8
B. Change in Community of License Criteria	9
III. Station WRAC(FM), West Union to Georgetown, Ohio	11
IV. Conclusion.....	12

SUMMARY

This Petition is filed on behalf of Balogh Broadcasting Company, Inc., licensee of Station WOXY(FM), Oxford, Ohio, Richard L. Plessinger, Sr., licensee of Station WAXZ(FM), Georgetown, Ohio, and Dreamcatcher Communications, Inc., licensee of Station WRAC(FM), West Union, Ohio. Specifically, Petitioners requests that the Commission amend the FM Table of Allotments to (i) delete Channel 249A at Oxford, Ohio and allot Channel 249A at Mason, Ohio as that community's first local service; (ii) delete Channel 249A at Georgetown, Ohio and allot Channel 249A at Salt Lick, Kentucky as that community's first local service; and (iii) delete Channel 276A at West Union, Ohio and allot Channel 276A at Georgetown, Ohio. If this Petition is granted, the communities of Mason, Ohio and Salt Lick, Kentucky (with a combined population of 22,358) will receive their first local service. If this Petition is granted, Petitioners will file applications respectively for Channel 249A at Mason, Channel 249A at Salt Lick, and Channel 276A at Georgetown, and will construct the facilities as authorized.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Amendment of Section 73.202(b))
Table of Allotments) MB Docket No. _____
FM Broadcast Stations) RM - _____
(Georgetown, Mason, Oxford and)
West Union, Ohio, and Salt Lick, Kentucky)

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

PETITION FOR RULE MAKING

Balogh Broadcasting Company, Inc. ("Balogh"), licensee of Station WOXY(FM), Oxford, Ohio, by its counsel, hereby requests that the Commission amend the FM Table of Allotments to delete Channel 249A at Oxford, Ohio, and allot Channel 249A at Mason, Ohio as that community's first local service. If this Petition is granted, Balogh will file an application for Channel 249A at Mason, Ohio, and will construct the facilities as authorized. Richard L. Plessinger, Sr. ("Plessinger"), licensee of Station WAXZ(FM), Georgetown, Ohio, hereby requests that the Commission amend the FM Table of Allotments to delete Channel 249A at Georgetown, Ohio, and allot Channel 249A at Salt Lick, Kentucky, as that community's first local service. If this Petition is granted, Plessinger will file an application for Channel 249A at Salt Lick, Kentucky, and will construct the facilities as authorized. Dreamcatcher Communications, Inc. ("Dreamcatcher"), licensee of Station WRAC(FM), West Union, Ohio, by its counsel, hereby requests that the Commission amend the FM Table of Allotments to delete Channel 276A at West Union, Ohio, and allot Channel 276A at Georgetown, Ohio. If this Petition is granted, Dreamcatcher will file an application for Channel 276A at Georgetown,

Ohio, and will construct the facilities as authorized. The following table summarizes the changes requested in this Petition:

City	Channel	
	Existing	Proposed
Oxford, Ohio	249A	--
Mason, Ohio	--	249A
Georgetown, Ohio	249A	276A
Salt Lick, Kentucky	--	249A
West Union, Ohio	276A	--

I. Station WOXY(FM), Oxford to Mason, Ohio

A. Technical Analysis

1. As demonstrated in the Technical Narrative, Channel 249A can be allotted to Mason at the coordinates 39-20-57 North Latitude, 84-12-08 West Longitude consistent with Section 73.207 of the Commission's Rules, provided that a transmitter site change is made for Station WAXZ at Georgetown as described more fully below. See Figure 1A. A 70 dBu signal can be provided to Mason from the proposed reference point. See Figure 1B. The relocation of WOXY from Oxford to Mason will result in a predicted net gain in population of 399,328 persons and will provide a fifth aural service to a population of 15 persons within the WOXY 60 dBu contour. See Technical Narrative and Figure 7. The entire loss area will continue to receive at least 5 other aural services, and will thus remain well served. See Figures 5 & 6 .

B. Change in Community of License Criteria

2. Balogh desires to change the community of license for Station WOXY from Oxford to Mason under the guidelines set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 3870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*Community of*

License”). There, the Commission stated that a station may change its community of license without subjecting the licensee to competing expressions of interest if (1) the proposed allotment is mutually exclusive with the current allotment; (2) the current community of license will not be deprived of its only local service; and (3) the proposed arrangement of allotments is preferred under the Commission’s allotment priorities. These criteria are met here. First, the proposed use of Channel 249A at Mason is mutually exclusive with the current use of Channel 249A at Oxford. See Figure 1A. Second, Oxford will not be deprived of its only local service because Station WMUB(FM) is currently licensed to operate at Oxford. Third, the establishment of first local service at Mason (2000 U.S. Census pop. 22,016) and at Salt Lick (2000 U.S. Census pop. 342) under Priority 3 will result in a preferential arrangement of allotments over the retention of a second local service at Oxford (2000 U.S. Census pop. 21,943) and at West Union (2000 U.S. Census pop. 2,903), under Priority 4.¹ See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) (“*Revision*”).

3. Mason is located inside the Cincinnati, Ohio-Kentucky-Indiana Urbanized Area. Oxford is not located in an Urbanized Area. Therefore, this relocation implicates the Commission’s policy regarding the migration of stations into urban areas. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995) (“*Headland*”); *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) (“*Tuck*”). In such cases, the Commission will consider (1) the extent to which the station will provide service to the entire Urbanized Area, (2) the relative populations and proximity of the suburban and central city, and, most importantly, (3) the independence of the suburban community. In this case, from the proposed transmitter site, WOXY would place a 70 dBu contour over 12.8% percent of the Cincinnati Urbanized Area. Mason, located in Warren County, is located approximately 25.4 kilometers from Cincinnati and

¹ Georgetown (2000 U.S. Census pop. 3,691), also implicated in this proposal, will retain local service.

the 2000 Census population of Mason (22,016) is 6.6 percent of that of Cincinnati (331,285). These figures are similar to those of other suburban communities granted a first local preference. *See, e.g., Old Fort, Fletcher, and Asheville, North Carolina; Surgoinsville, Tennessee, and Augusta, Georgia*, 18 FCC Rcd 12181 (2003) (Fletcher's population is 6.7% of that of Asheville, and Fletcher is located 17 kilometers from Asheville); *Malvern and Bryant, Arkansas*, 14 FCC Rcd 3576 (1999) (Bryant's population is 3% of that of Little Rock, and Bryant is located 20 miles from Little Rock). Nevertheless, the Commission has repeatedly stated that these factors are less important than evidence of independence. *See Headland*, 10 FCC Rcd at 10352. The following analysis of the eight *Tuck* factors demonstrates the independence of Mason from Cincinnati.

(1) ***Extent to which the residents of Mason work in Mason.*** According to 2000 Census figures, 2,490 of the 10,909 (22.8%), employed residents of Mason work in Mason. *See* Exhibit 2. This percentage compares favorably with other independent communities. *See, e.g., Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876 (2001), *application for review pending* (11.3% of working-age residents worked in community); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996) (13% of Gilbert's working population actually worked in Gilbert).

(2) ***Newspapers and other media that cover Mason's local needs and interests.*** The *Pulse-Journal* is a weekly publication that has served the community of Mason since 1976. It is published weekly, and is also available on the web at <www.pulsejournal.com>. The *Pulse Journal* provides coverage of local community news, sports, and advertising and its coverage of local government and schools keeps its readers well-informed about their community. The *Pulse-Journal* also provides news and

features about neighborhoods, civic organizations, religious institutions, and local businesses. The website states that “our focus is close to home, your home.” See Exhibit 2.

(3) Community leaders perceive Mason as being separate from Cincinnati.

Mason was founded in 1803 when Revolutionary War veteran William Mason purchased 640 acres of land in what is now downtown Mason. Mason was originally incorporated as the Village of Palmira in 1815. In 1835 the town was officially named Mason and recognized by the post office. Mason remained a small farming community for over a century. Then in 1971, Mason was incorporated as a city and “it is increasingly being recognized as a rapidly growing, progressive community with an attractive industrial base.” Cintas Corporation, Mitsubishi, Procter & Gamble, and Luxottica Retail are among the many large companies that are located in Mason. Mason is currently promoting itself through a community campaign, “imagine Mason”. This campaign states the following about Mason: “a combination of fortunate location, far-sighted city leadership, innovative management, outstanding schools, successful corporations, and a close-knit traditional community have succeeded in building a progressive, polished city with a comfortable hometown feel.” See Exhibit 2.

(4) Mason has its own local government and elected officials.

The City of Mason operates under a council – city manager form of government, which combines the strong political leadership of elected officials with the strong managerial experience of an appointed local government manager. The general legislative power lies with the Council, which appoints the City Manager to operate Mason’s administrative offices. The Council consists of seven members of the community who are elected to at-large

staggered four year terms. The Council establishes law and policy by passing ordinances and resolutions. The City Manager oversees the daily operation of the city, implements Council objectives, oversees staff, prepares the annual budget, and keeps the Council advised on the financial status of the City. *See Exhibit 2.*

City Council meetings are open to the public and held on the second and fourth Mondays of each month. In addition to their legislative duties, each Council member sits on a number of the council subcommittees, including building, economic development, employee relations, equipment, finance, public works, safety, utility, ad hoc, and court liaison. The City of Mason also has the following departments: administration, engineering and building, finance, fire, parks and recreation, police, public utilities, and public works. The City of Mason employs about 130 full-time employees, about 90 part-time employees, and about 20 seasonal employees. *See Exhibit 2.*

(5) *There is one zip code reserved exclusively for Mason and Mason shares a phone directory with Warren County.* The zip code designated exclusively for Mason is 45040 and the U.S. Postal Service operates five post offices in Mason. The government and business listings for Mason are contained in the Warren County Area Wide phone book. The residents of Mason can use this phone book and do not have to rely on the Cincinnati phone book. *See Exhibit 2.*

(6) *Mason has its own commercial establishments and health services.* Mason is a member of the Mason-Landen-Kings Chamber of Commerce, which is located in Mason. A number of local businesses identify with Mason by using "Mason" in their name, including Mason Animal Hospital, Mason Auto Sales, Mason BP, Mason Beer Drive Thru, Mason Bowl, Mason Chiropractic Center, Mason Dance Center, Mason

Firestone, and Mason Framing Gallery. Other Mason retail and commercial businesses include, National Bank & Trust, Kroger Grocery & Pharmacy, 1st National Bank, Allstate Insurance, Angilo's Pizza, CVS Pharmacy, Edward Jones Investments, Fischer Homes, GE Credit Union, Great Clips for Hair, and Pets-N-Such. *See Exhibit 2.*

Mason is home to a number of health care providers, including, Mason Primary Care, Group Health Associates, Health Alliance, Mercury Urgent Care, Jewish Hospital Mason Medical Center, Mason Dental Care, Mason Dental Center, Mason Family Medicine, Mason Healthcare Center, and Medical Associates of Mason. *See Exhibit 2.*

Mason is home to approximately 19 churches including, Celebration Church, Grace Baptist Church, Mason United Methodist Church, Christ's Church at Mason, and Mason Church of God. The City of Mason recently completed construction of a new state-of-the-art community center that allows the residents of Mason to participate in recreational and leisure activities. *See Exhibit 2.*

(7) *Mason is a separate and distinct advertising market from Cincinnati.*
The *Pulse-Journal* provides the businesses of Mason with a place to advertise to reach the residents of Mason without relying on Cincinnati media. Businesses can advertise in the hardcopy editions of the *Pulse-Journal* and on its website. *See Exhibit 2.*

(8) *Mason has its own schools, library, police protection and fire protection.*
The Mason City School District serves the residents of Mason with the following schools located in Mason: Early Childhood Center, Mason Heights Elementary, Western Row Elementary, Mason Intermediate Campus, Mason Middle School, and Mason High School. The Mason Public Library is located in Mason and provides the residents of Mason with traditional library services. The library holds approximately 112,000 items

and has more than 18,000 registered patrons. The library's summer reading program, which runs June through July, boasts a membership each year of more than 800 children. The library offers computer access to the Internet and NetWellness, interlibrary loan services, voter and Golden Buckeye Card registration, and a host of other services. *See Exhibit 2.*

The City of Mason has a full-service municipal police department that employs approximately 36 full-time police officers. The City of Mason Police Department has about 13 police cars and several unmarked cars. The police department operates four community policing patrol districts throughout Mason and has an operating budget of approximately \$2.9 million. The City of Mason Fire Department is staffed by approximately 70 fire and emergency medical personnel. The fire department has 17 vehicles, which operate from one of the city's two fire stations and has an operating budget of approximately \$3.7 million. *See Exhibit 2.*

4. Mason is clearly independent of Cincinnati and therefore deserving of a first local service. Balogh reiterates that if the Commission allots Channel 249A at Mason, Ohio as that community's first local service, it will file an application for Channel 249A at Mason and will construct the facilities as authorized.

II. Station WAXZ(FM), Georgetown, Ohio to Salt Lick, Kentucky

A. Technical Analysis

5. As demonstrated in the Technical Narrative, Channel 249A can be allotted to Salt Lick at the coordinates 38-10-15 North Latitude, 83-34-31 West Longitude consistent with Section 73.207 of the Commission's Rules with respect to all existing and proposed domestic allotments and facilities. *See Figure 2A.* A 70 dBu signal can be provided to Salt Lick from the proposed reference point. *See Figure 2B.* The relocation of WAXZ from Georgetown, Ohio to

Salt Lick, Kentucky will result in a predicted net loss of 36,904 persons. See Figure 7. The entire loss area will continue to receive at least 5 other aural services, and will thus remain well served.

B. Change in Community of License Criteria

6. Plessinger desires to change the community of license for Station WAXZ from Georgetown to Salt Lick under the guidelines set forth in *Community of License, supra*. First, the proposed use of Channel 249A at Salt Lick is mutually exclusive with the current use of Channel 249A at Georgetown. See Figure 2A. Second, Georgetown will not be deprived of its only local service because, as discussed in Paragraph 14 herein, Dreamcatcher proposes to change the community of license of WRAC from West Union, Ohio to Georgetown, Ohio. Third, as discussed in Paragraph 2 herein, the establishment of first local service at Mason (2000 U.S. Census pop. 22,016) and at Salt Lick (2000 U.S. Census pop. 342) under Priority 3 will result in a preferential arrangement of allotments over the retention of a second local service at Oxford (2000 U.S. Census pop. 21,943) and at West Union (2000 U.S. Census pop. 2,903), and the retention of local service at Georgetown (2000 U.S. Census pop. 3,691) under Priority 4. See *Revision, supra*.

7. Salt Lick is not located in an Urbanized Area, and the proposed 70 dBu contour of WAXZ will not encompass more than 50 percent of an Urbanized Area. Therefore, this relocation does not implicate the Commission's policy against migration of stations from rural to urban areas, and a *Tuck* showing is not required.

8. Salt Lick enjoys the attributes that the Commission traditionally associates with a community. Salt Lick is listed in the 2000 U.S. Census and therefore is presumed to have the status of a community for allotment purposes. See *Arnold and Columbia, California*, 7 FCC Rcd 6302 (1992).

9. The U.S. Post Office has designated the zip code 40371 for Salt Lick and operates an office at 91 S Highway 211 in Salt Lick. The Salt Lick Volunteer Fire Department provides the community of Salt Lick with traditional fire and rescue services. The Salt Lick Elementary School is located in Salt Lick and has an enrollment of approximately 120 students. *See Exhibit 3.*

10. Salt Lick is located in Bath County, Kentucky. It was founded as a hunting town, but the lumber industry quickly became the primary business when the railroad was built through Salt Lick in the late 1800's. The Reeves Lumber Co., which produces wood flooring and paneling, is located on Main Street in Salt Lick and provides employment for the residents of Salt Lick. Today, in addition to the lumber industry, Salt Lick supports a tourism industry. Cave Run Lake and the Daniel Boone National Forest are located 20 minutes from Salt Lick and many of the businesses in Salt Lick cater to the individuals who travel to these destinations. *See Exhibit 3.*

11. Salt Lick is home to a variety of businesses and commercial establishments. A number of local businesses identify with the community by using "Salt Lick" in their name, including the Salt Lick Deposit Bank and the Salt Lick Grocery. Other Salt Lick retail and commercial businesses include, Riverside Photography Studio, Byrds Chrysler Products, Sunlite Auto Glass, Whitts Body Shop, Heltons Ashland Service Station, Fredericks Electrical, Clear Creek Market Restaurant, Maze Standard Food Mart, Woods Kentucky Food Store, Family Hairstyling, and Wildwood Flowers and Gifts. The website <www.saltlickky.com> allows the businesses and residents in Salt Lick to advertise to the community of Salt Lick. The website has a one time listing fee of \$25 and ads will run for six months. The community of Salt Lick is

home to a number of churches, including the Lakeview Community Church and the Midland Church of God. *See Exhibit 3.*

12. Salt Lick is a community deserving of a first local service. Plessinger reiterates that if the Commission allots Channel 249A to Salt Lick, Kentucky as that community's first local service, he will file an application for Channel 249A at Salt Lick and will construct the facilities as authorized.

III. Station WRAC(FM), West Union to Georgetown, Ohio

13. In order to maintain local service at Georgetown, Dreamcatcher desires to change the community of license of Station WRAC from West Union to Georgetown. As demonstrated in the Technical Exhibit, Channel 276A can be allotted to Georgetown at the coordinates 38-52-14 North Latitude, 83-45-55 West Longitude consistent with Section 73.207 of the Commission's Rules with respect to all existing and proposed domestic allotments and facilities. *See Figure 3A.* A 70 dBu signal can be provided to Georgetown from the proposed reference point. *See Figure 3B.* The relocation of WRAC from West Union to Georgetown will result in a predicted net gain of 14,512 persons within the 60 dBu contour. *See Figure 7.* The entire loss area will continue to receive at least 5 other aural services, and will thus remain well served.

14. Dreamcatcher desires to make this change under the guidelines set forth in *Community of License, supra.* First, the proposed use of Channel 276A at Georgetown is mutually exclusive with the current use of Channel 276A at West Union. *See Figure 3A.* Second, West Union will not be deprived of its only local service because Station WVXW(FM) is currently licensed to operate at West Union. Third, as discussed in Paragraph 2 herein, the establishment of first local service at Mason (2000 U.S. Census pop. 22,016) and at Salt Lick (2000 U.S. Census pop. 342) under Priority 3 will result in a preferential arrangement of allotments over the retention of a second local service at Oxford (2000 U.S. Census pop. 21,943)

and at West Union (2000 U.S. Census pop. 2,903), and the retention of local service at Georgetown (2000 U.S. Census pop. 3,691) under Priority 4. *See Revision, supra.*

IV. Conclusion

15. This Petition advanced by Balogh, Plessinger, and Dreamcatcher offers significant public interest benefits. The communities of Mason, Ohio and Salt Lick, Kentucky will each receive a first local service, while the current communities of Oxford, Georgetown and West Union, Ohio will retain local service. There will also be a substantial net increase in population served. Accordingly, Balogh, Plessinger, and Dreamcatcher urges the Commission to grant this Petition.

Respectfully submitted,

BALOGH BROADCASTING COMPANY, INC.

I verify that the factual information as to WAXZ(FM) contained herein is true to the best of my knowledge, information and belief.


Richard L. Plessinger, Sr.
35 Island Drive #16
Eastpoint, FL 32328
513-218-1843

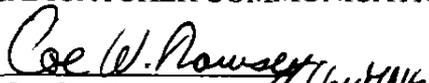
Of Counsel:

Mark N. Lipp
Scott Woodworth
Vinson & Elkins, L.L.P.
1455 Pennsylvania Ave, NW
Suite 600
Washington, DC 20004
202-639-6500

By:  (by HNC)
Harry E. Martin
Fletcher Heald & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209
703-812-0415

Its Counsel

DREAMCATCHER COMMUNICATIONS, INC.

By:  (by HNC)
Coe W. Ramsey
Brooks Pierce McLendon Humphrey & Leonard
PO Box 1800
Raleigh, NC 27602
919-839-0300

Its Counsel

March 23, 2004

TECHNICAL EXHIBIT

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
OXFORD, MASON, WEST UNION AND GEORGETOWN, OHIO
AND SALT LICK, KENTUCKY

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of FM station WOXY (herein "Petitioner") in support of a Petition for Rule Making ("Petition") to amend Section 73.202(b) by the reallocation of channel 249A from Oxford, Ohio to Mason, Ohio, and the modification of the license of WOXY on channel 249A at Oxford, Ohio accordingly (BLH-19890105KC). As the requested change to channel 249A at Mason is mutually exclusive with the present allotment of channel 249A at Oxford, Petitioner invokes the provisions of Section 1.420(i).

As part of this Petition, the licensee of WAXZ on channel 249A at Georgetown, Ohio (BLH-19871202KG) requests the reallocation of channel 249A from Georgetown to Salt Lick, Kentucky as that community's first local aural service and the modification of WAXZ's license accordingly. In order to provide a replacement service at Georgetown, the licensee of WRAC on channel 276A at West Union, Ohio (BLH-19920915KA) requests the reallocation of channel 276A from West Union to Georgetown and the modification of WRAC's license accordingly.

The following is a summary of the reallocation proposal:

- The city of Mason, Ohio (2000 Census population 22,016) will be provided with its first local aural transmission service by the proposed WOXY channel 249A operation.
- The WOXY proposal will not remove the only local service at Oxford, Ohio (2000 population 21,943), as noncommercial, educational FM station WMUB is currently licensed to operate on channel 203B at Oxford.
- The city of Salt Lick, Kentucky (2000 Census population 342) will be provided with its first local aural transmission service by the proposed WAXZ channel 249A operation.
- The WAXZ proposal will not remove the only local service at Georgetown, Ohio (2000 Census population 3,691), as WRAC on

channel 276A at West Union, Ohio will be reallocated from West Union to Georgetown. Furthermore, West Union (2000 Census population 2,903) will not be deprived of its sole existing service as FM station WVXW is currently licensed to operate on channel 208A at West Union.

- The number of persons within the WOXY 1 mV/m contour will increase from 267,791 persons to 667,119 persons, and there will be a "net" increase in 1 mV/m coverage to 423,179 persons.
- Although Mason is located within the Cincinnati, Ohio-Kentucky-Indiana Urbanized area as defined by the 2000 U.S. Census, as detailed elsewhere in this Petition it is believed that Mason warrants a first local service preference.
- Neither Georgetown, Salt Lick nor West Union are located within an Urbanized Area, and the 70 dBu contours for the present and proposed WRAC and WAXZ operations will encompass less than 50% of the land area of any Urbanized Area.
- The proposal will provide a fifth aural service to a population of 15 persons within the gain area.
- The loss area is considered to be well-served.

Proposed Change in Table of Allotments

Station WOXY is currently licensed (BLH-19890105KC) to operate on channel 249A at Oxford, Ohio with an effective radiated power (ERP) of 3 kW and an antenna height above average terrain (HAAT) of 98 meters. Oxford city is located in Butler County, Ohio and has a 2000 U.S. Census population of 21,943 persons. Oxford will not be deprived of its sole local service as noncommercial educational FM station WMUB is currently licensed to operate on channel 203B at Oxford (BLED-19940407KB).

Mason city, Ohio is located in Warren County and has a 2000 U.S. Census population of 22,016 persons. Mason has no local FM or AM service and, therefore, Petitioner's proposal would bring first local aural broadcast service to Mason.

Station WAXZ is currently licensed (BLH-19871202KG) to operate on channel 249A at Georgetown, Ohio with an ERP of 2.1 kW and an HAAT of 118 meters. In order to effectuate the channel 249A allotment at Mason, the licensee of WAXZ on channel 249A at Georgetown, Ohio requests the reallocation of channel 249A from Georgetown, Ohio to Salt Lick, Kentucky as that community's first local aural service.

Georgetown, Ohio is located in Brown County and has a 2000 U.S. Census population of 3,691 persons. Although Georgetown has no other local FM or AM services, it will not be deprived of its sole existing local service as WRAC on channel 276A at West Union, Ohio will be reallocated from West Union to Georgetown. Furthermore, West Union, which is located in Adams County and has a 2000 Census population 2,903, will not be deprived of its sole existing service as noncommercial educational FM station WVXW is currently licensed to operate on channel 208A at West Union (BLED-19930628KD).

Salt Lick, Kentucky is located in Bath County and has a 2000 U.S. Census population of 342 persons. Salt Lick has no local FM or AM service and, therefore, Petitioner's proposal would bring first local aural broadcast service to Salt Lick.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Oxford, Ohio	249A	--
Mason, Ohio	--	249A
Georgetown, Ohio	249A	276A
Salt Lick, Kentucky	--	249A
West Union, Ohio	276A	--

Compliance With FCC Rules

The attached Figure 1A is a tabulation of required separations pertinent to use of channel 249A at Mason. The reference site complies with the Commission's minimum distance separation requirements contained in section 73.207 to all

existing, authorized and proposed stations and allotments except for a short-spacing with WAXZ on channel 249A at Georgetown, Ohio. However, as part of this Petition the licensee of WAXZ proposes the reallocation of channel 249A from Georgetown to Salt Lick, Kentucky which will eliminate this short-spacing.

Figure 1B is a map showing the area to locate channel 249A at Mason in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class A facilities (ERP 6 kW/HAAT 100 m). The Mason city limits shown on Figure 1B were obtained from a map contained in the 2000 U.S. Census of Population. Operation from the allotment reference site will provide the requisite city grade signal to all of Mason.¹

Pursuant to Section 1.420(i), the Commission will consider petitions to modify the license/construction permit of an FM station to specify a new community if the proposed allotment would be mutually exclusive with the present assignment. As the entire area to locate for channel 249A at Mason depicted on Figure 1B would be short-spaced to the licensed WOXY operation on channel 249A, including the channel 249A reference site, the new allotment is mutually exclusive with the existing allotment.

In order to effectuate the channel 249A allotment at Mason, the licensee of WAXZ proposes the reallocation of channel 249A from Georgetown, Ohio to Salt Lick, Kentucky. The attached Figure 2A is a tabulation of required separations pertinent to use of channel 249A at Salt Lick. The reference site complies with the Commission's minimum distance separation requirements contained in section 73.207 to all existing, authorized and proposed stations and allotments.

¹ The Mason reference site is an existing tower (tower registration number 1015337).

Figure 2B is a map showing the area to locate channel 249A at Salt Lick in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class A facilities (ERP 6 kW/HAAT 100 m). The Salt Lick city limits shown on Figure 2B were obtained from a map contained in the 2000 U.S. Census of Population. Operation from the allotment reference site will provide the requisite city grade signal to all of Salt Lick.²

Pursuant to Section 1.420(i), the Commission will consider petitions to modify the license/construction permit of an FM station to specify a new community if the proposed allotment would be mutually exclusive with the present assignment. As the entire area to locate for channel 249A at Salt Lick depicted on Figure 2B would be short-spaced to the licensed WAXZ operation on channel 249A, including the channel 249A reference site, the new allotment is mutually exclusive with the existing allotment.

Georgetown, Ohio will not be deprived of its sole existing local service as WRAC on channel 276A at West Union, Ohio will be reallocated from West Union to Georgetown. The attached Figure 3A is a tabulation of required separations pertinent to use of channel 276A at Georgetown. The reference site complies with the Commission's minimum distance separation requirements contained in section 73.207 to all existing, authorized and proposed stations and allotments.

Figure 3B is a map showing the area to locate channel 276A at Georgetown in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class A facilities (ERP 6 kW/HAAT 100 m). The Georgetown city limits shown on Figure 3B were obtained from a map contained in the 2000 U.S. Census of

² The Salt Lick reference site is an existing tower (tower registration number 1208220).

Population. Operation from the allotment reference site will provide the requisite city grade signal to all of Georgetown.³

Urbanized Area Considerations

Mason is located within the Cincinnati, Ohio-Kentucky-Indiana Urbanized area. The proposed 70 dBu contour for the proposed channel 249A operation at Mason will encompass 12.8% of the Cincinnati, Ohio-Kentucky-Indiana Urbanized Area. Furthermore, the reference point of Mason is located approximately 25.4 kilometers north-northeast of the reference point of Cincinnati.⁴

Neither Georgetown, Salt Lick nor West Union are located within an Urbanized Area, and the 70 dBu contours for the present and proposed WRAC and WAXZ operations will encompass less than 50% of the land area of any Urbanized Area.

Gain and Loss Areas and Available Aural Services

Figure 4, attached, is a map showing the FM 1 mV/m primary service contours for the licensed WOXY operation on channel 249A at Oxford, the proposed WOXY channel 249A allotment at Mason, the licensed WAXZ operation on channel 249A at Georgetown, the proposed WAXZ channel 249A allotment at Salt Lick, the licensed WRAC operation on channel 276A at West Union and the proposed WRAC channel 276A allotment at Georgetown. Maximum facilities for each class and uniform terrain were utilized. The 1 mV/m "gain" and "loss" areas are also indicated.

Figure 5, attached, is a map also showing the FM 1 mV/m primary service contours for the licensed WOXY operation on channel 249A at Oxford, the proposed WOXY channel 249A

³ The West Union reference site is an existing tower (tower registration number 1217283).

⁴ The reference points of Mason (N39°21'36", W84°18'36") and Cincinnati (N39°09'43", W84°27'25") were obtained from the Geographic Names Information System.

allotment at Mason, the licensed WAXZ operation on channel 249A at Georgetown, the proposed WAXZ channel 249A allotment at Salt Lick, the licensed WRAC operation on channel 276A at West Union and the proposed WRAC channel 276A allotment at Georgetown. Maximum facilities for each class and uniform terrain were utilized. The 1 mV/m "gain" and "loss" areas are also indicated. Also shown are other aural (AM, FM) services available to the areas within the 1 mV/m contours.⁵ Figure 6 tabulates the AM and FM stations whose contours are shown on Figure 5. For FM stations the 1 mV/m contour is depicted, and for AM stations the nighttime-interference-free contour (NIF) is shown. The letters identify the AM and FM service contours of stations tabulated on Figure 6. Numbers indicate the number of available aural services.

There are at least five other services available to the loss areas. The gain areas include an area receiving four services and having a population of 15 persons. The remainder of the gain is well served.

Population and Area within Gain and Loss Areas

Figure 7 is a tabulation of the land areas and estimated populations within the 1 mV/m FM primary service contours for the licensed WOXY operation on channel 249A at Oxford, the proposed WOXY channel 249A allotment at Mason, the licensed WAXZ operation on channel 249A at Georgetown, the proposed WAXZ channel 249A allotment at Salt Lick, the licensed WRAC operation on channel 276A at West Union and the proposed WRAC channel 276A allotment at Georgetown. Also tabulated are the gain, loss and "net" gain areas and the results of the reception service analyses for these areas. Adoption of the Petitioner's proposal will increase the number of persons within the WOXY 1 mV/m contour from 267,791 persons to 667,119

⁵The determination of available reception services was based on the criteria set forth in footnote 1 of the Notice of Proposed Rule Making in MM Docket No. 96-219 (DA 96-1774; adopted October 25, 1996, released November 1, 1996).

persons and will result in a "net" increase in 1 mV/m coverage to 423,179 persons.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of Section 73.313, except that uniform terrain was presumed in all directions. Distances to AM contours were based on either nondirectional radiation pattern values or standard radiation pattern values obtained from the FCC's AM database. FCC Figure M-3 conductivity employed along all azimuths.

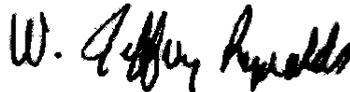
Population and Area

The population within each FM primary service contour (1 mV/m) and each gain, loss, reception and interference area was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service area. The area within each FM primary service contour was calculated using a root mean square algorithm.

Conclusion

Station WOXY on Channel 249A can be reallocated from Oxford, Ohio to Mason, Ohio in compliance with all applicable Commission Rules. Station WAXZ on channel 249A can be reallocated from Georgetown, Ohio to Salt Lick, Kentucky in compliance with all applicable Commission rules. Station WRAC on channel 276A can be reallocated from West Union to Georgetown, Ohio in compliance with all applicable Commission rules. The proposal will result in first local aural service to Mason and Salt Lick. The proposal will not remove the only local service at Oxford as noncommercial educational FM station WMUB is currently licensed to operate on channel 203B at Oxford. Furthermore, Georgetown will not be deprived of its

sole local service as WRAC on channel 276A at West Union, Ohio will be reallocated from West Union to Georgetown, and West Union will not be deprived of its sole existing service as noncommercial educational FM station WVXW is currently licensed to operate on channel 208A at West Union. In addition, the number of persons within the WOXY 1 mV/m contour will increase from 267,791 persons to 667,119 persons and will result in a "net" increase in 1 mV/m coverage to 423,179 persons. The proposal will provide a fifth aural service to a population of 15 persons within the gain area. The proposal will not create any underserved loss area. Therefore, Petitioner requests the reallocation of channel 249A to Mason and the modification of the Petitioner's license to specify operation on channel 249A at Mason.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941)329-6000
JEFF@DLR.COM

February 25, 2004

CDBS FM SEPARATION STUDY

Job Title: Proposed WOXY, Mason, OH
Channel: 249 A

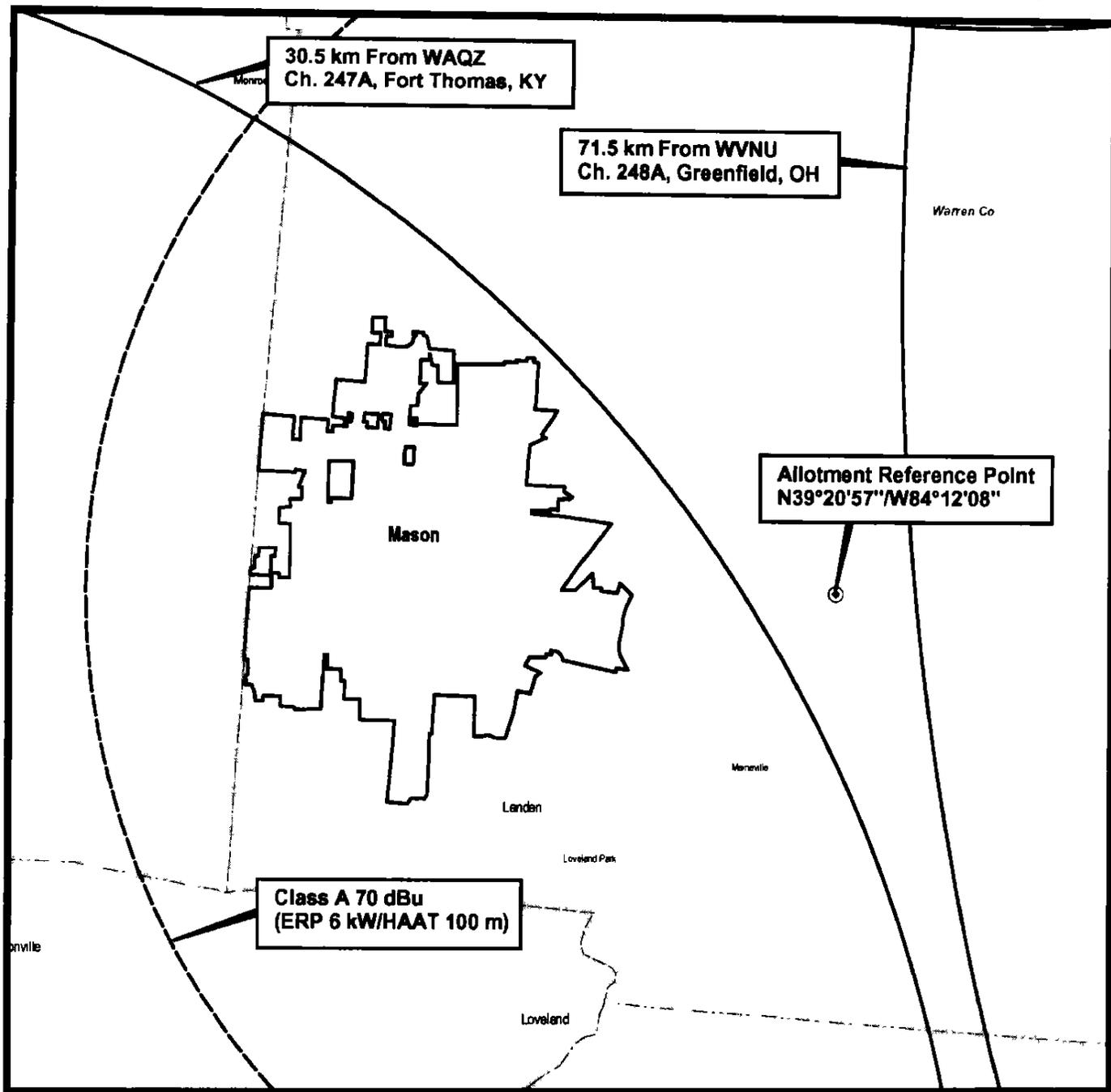
Separation Buffer: 32 km
Coordinates: 392057 841208

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
WAQZ 40915	FORT THOMAS KY LIC C	BLH 20030418AAV	247 A 97.3	2.550 155	Y 59170	39-12-01 084-31-22	Y	239.1	32.22 1.22	25.0 Close	31.0
WVNU 61331	GREENFIELD OH LIC C	BLH 19980729KE	248 A 97.5	2.300 164	N	39-24-28 083-21-15	N	84.6	73.36 1.36	49.0 Close	72.0
WAMZ 11921	LOUISVILLE KY CP C	BPH 19990607IB	248 C1 97.5	100.000 203	N	38-15-40 085-25-43	N	221.7	161.05 28.05	111.0 Clear	133.0
WOXY 3653	OXFORD OH LIC C	BLH 19890105KC	249 A 97.7	3.000 98	N	39-28-44 084-45-51	N	286.8	50.49 -64.51	92.0 Short ¹	115.0
WAXZ 56222	GEORGETOWN OH LIC C	BLH 19871202KG	249 A 97.7	2.100 118	N	38-52-03 083-48-44	N	147.7	63.22 -51.78	92.0 Short ²	115.0
WAXZ 56222	SALT LICK KY PROPOSED		249 A 97.7			38-10-56 083-26-56		153.0	145.15 30.15	92.0 Clear ²	115.0
WCJO 29684	JACKSON OH LIC C	BLH 7141	249 A 97.7	3.000 91	N	39-01-45 082-35-51	N	103.9	143.12 28.12	92.0 Clear	115.0
WNCI 47741	COLUMBUS OH LIC C	BLH 7323	250 B 97.9	175.000 171	Y 13443	39-58-10 083-00-10	N	55.7	123.85 10.85	96.0 Close	113.0
WUDR 69423	DAYTON OH LIC C	BLED 20031114AFJ	251 D 98.1	0.013 18	N	39-48-57 084-11-33	N	0.9	51.82 24.82	0.0 Clear	27.0
WKET 34301	KETTERING OH LIC C	BLED 19851218KD	252 D 98.3	0.013 76	N	39-41-46 084-09-43	N	5.1	38.67 11.67	0.0 Close	27.0

¹ Existing WOXY site. Requested reallocation of channel 249A to Mason, OH is mutually exclusive with Petitioner's current channel 249A allotment at Oxford, OH.

² As part of this Petition, the licensee of WAXZ proposes the reallocation of channel 249A from Georgetown, OH to Salt Lick, KY which will eliminate this short-spacing. See Technical Narrative, Figure 2.

Figure 1B



AREA-TO-LOCATE

CHANNEL 249A
MASON, OHIO

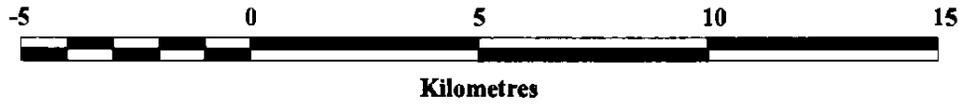
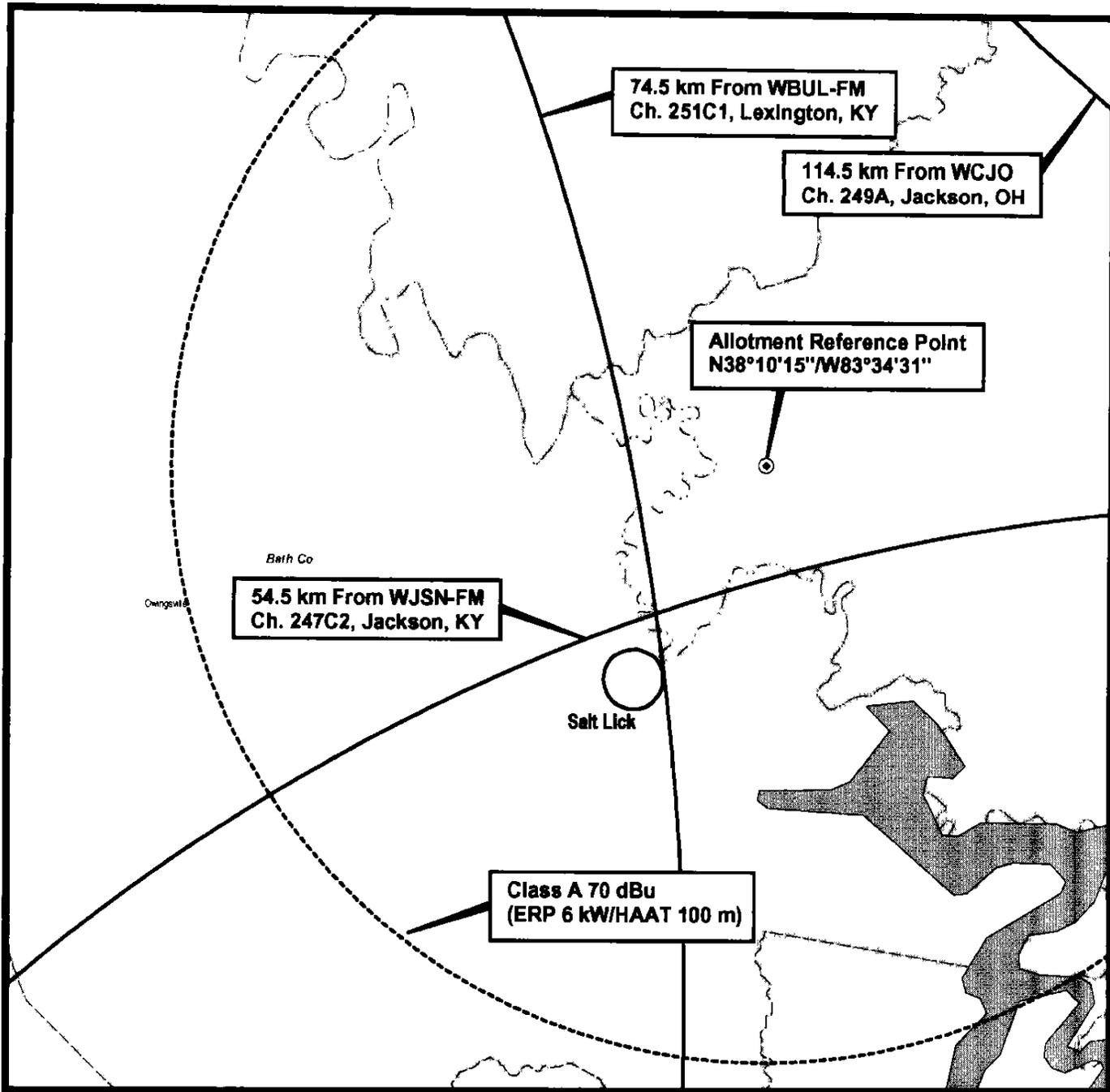
CDBS FM SEPARATION STUDY

Job Title: Proposed WAXZ, Ch. 249A, Salt Lick, KY Separation Buffer: 32 km
 Channel: 249 A Coordinates: 381015 833431

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215 207
	JACKSON KY RSV C	RM 9802	247 C2 97.3	0.000		37-40-19 083-24-21		164.9	57.34 2.34	49.0 55.0 Close
WJSN-F 28905	JACKSON KY CP C	BPH 20020726ABB	247 C2 97.3	19.000 248	N	37-40-19 083-24-21	N	164.9	57.34 2.34	49.0 55.0 Close
WRLV-F 37255	SALYERSVILL KY LIC C	BLH 20010307AAI	247 C3 97.3	10.000 103	N	37-45-27 083-03-50	Y	135.6	64.22 22.22	36.0 42.0 Clear
WAMZ 11921	LOUISVILLE KY CP C	BPH 19990607IB	248 C1 97.5	100.000 203	N	38-15-40 085-25-43	N	274.1	162.62 29.62	111.0 133.0 Clear
WAXZ 56222	GEORGETOWN OH LIC C	BLH 19871202KG	249 A 97.7	2.100 118	N	38-52-03 083-48-44	N	345.2	80.05 -34.95	92.0 115.0 Short ¹
WCJO 29684	JACKSON OH LIC C	BLH 7141	249 A 97.7	3.000 91	N	39-01-45 082-35-51	N	41.4	127.80 12.80	92.0 115.0 Close
96567	KENOVA WV VAC C		250 A 97.9	0.000	N	38-22-38 082-34-33	N	75.0	90.41 18.41	49.0 72.0 Clear
WZQQ 37110	HYDEN KY LIC C	BLH 19960311KB	250 C3 97.9	1.750 368	N	37-11-36 083-11-04	N	162.3	113.84 24.84	72.0 89.0 Clear
WBUL-F 70192	LEXINGTON KY LIC C	BLH 19970110KA	251 C1 98.1	100.000 171	N	38-02-07 084-27-02	N	259.1	78.23 3.23	69.0 75.0 Close

¹ Existing WAXZ site. Requested reallocation of channel 249A to Salt Lick, KY is mutually exclusive with Petitioner's current channel 249A allotment at Georgetown, OH.

Figure 2B



AREA-TO-LOCATE

**CHANNEL 249A
SALT LICK, KENTUCKY**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CDBS FM SEPARATION STUDY

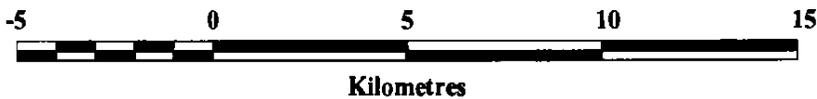
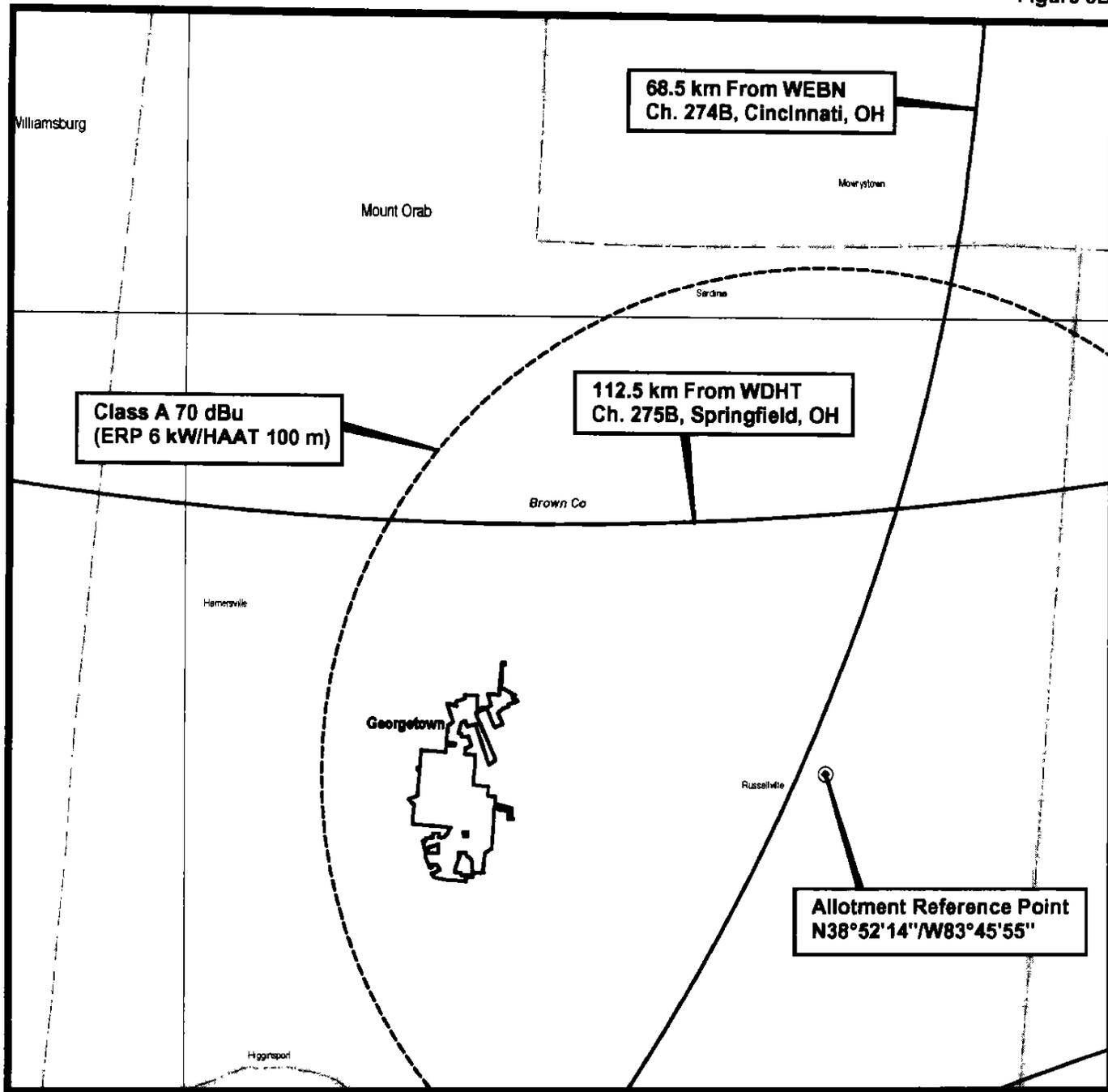
Job Title: Proposed WRAC, Georgetown, OH
 Channel: 276 A

Separation Buffer: 32 km
 Coordinates: 385214 834555

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
WEBN 29734	CINCINNATI OH LIC C	BLH 19981112KL	274 B 102.7	16.000 264	N	39-06-59 084-30-07	Y	293.5	69.41 0.41	63.0 Close	69.0
	WEST LIBERT KY DEL C	RM spm115	275 A 102.9	0.000		38-02-16 083-20-18		158.0	99.67 27.67	49.0 Clear	72.0
	WEST LIBERT KY ADD C	RM spm115	275 C3 102.9	0.000		38-02-16 083-20-18		158.0	99.67 10.67	72.0 Close	89.0
WLKS-F 43776	WEST LIBERT KY LIC C	BLH 19931119KH	275 A 102.9	6.000 100	N	38-02-16 083-20-18	N	158.0	99.67 27.67	49.0 Clear	72.0
WDHT 60252	SPRINGFIELD OH LIC C	BLH 19870511KC	275 B 102.9	50.000 150	N	39-57-11 083-52-07	N	355.8	120.51 7.51	96.0 Close	113.0
WRAC 50136	WEST UNION OH LIC C	BLH 19920915KA	276 A 103.1	3.300 130	N	38-51-28 083-36-42	N	96.0	13.41 -101.59	92.0 Short ¹	115.0
WKCH 16255	VERSAILLES IN LIC C	BLH 19850715KA	276 A 103.1	3.000 100	N	39-10-38 085-17-00	N	285.1	135.80 20.80	92.0 Clear	115.0
WTCR-F 7983	HUNTINGTON WV LIC C	BLH 19850627KH	277 B 103.3	50.000 150	N	38-25-11 082-24-06	N	112.5	128.83 15.83	96.0 Close	113.0
WGRR 72126	HAMILTON OH LIC C	BLH 19940718KB	278 B 103.5	11.000 316	Y	39-12-01 084-31-22	Y	299.5	75.11 6.11	63.0 Close	69.0

¹ Existing WRAC site. Requested reallocation of channel 276A to Georgetown, OH is mutually exclusive with the current channel 276A allotment at West Union, OH.

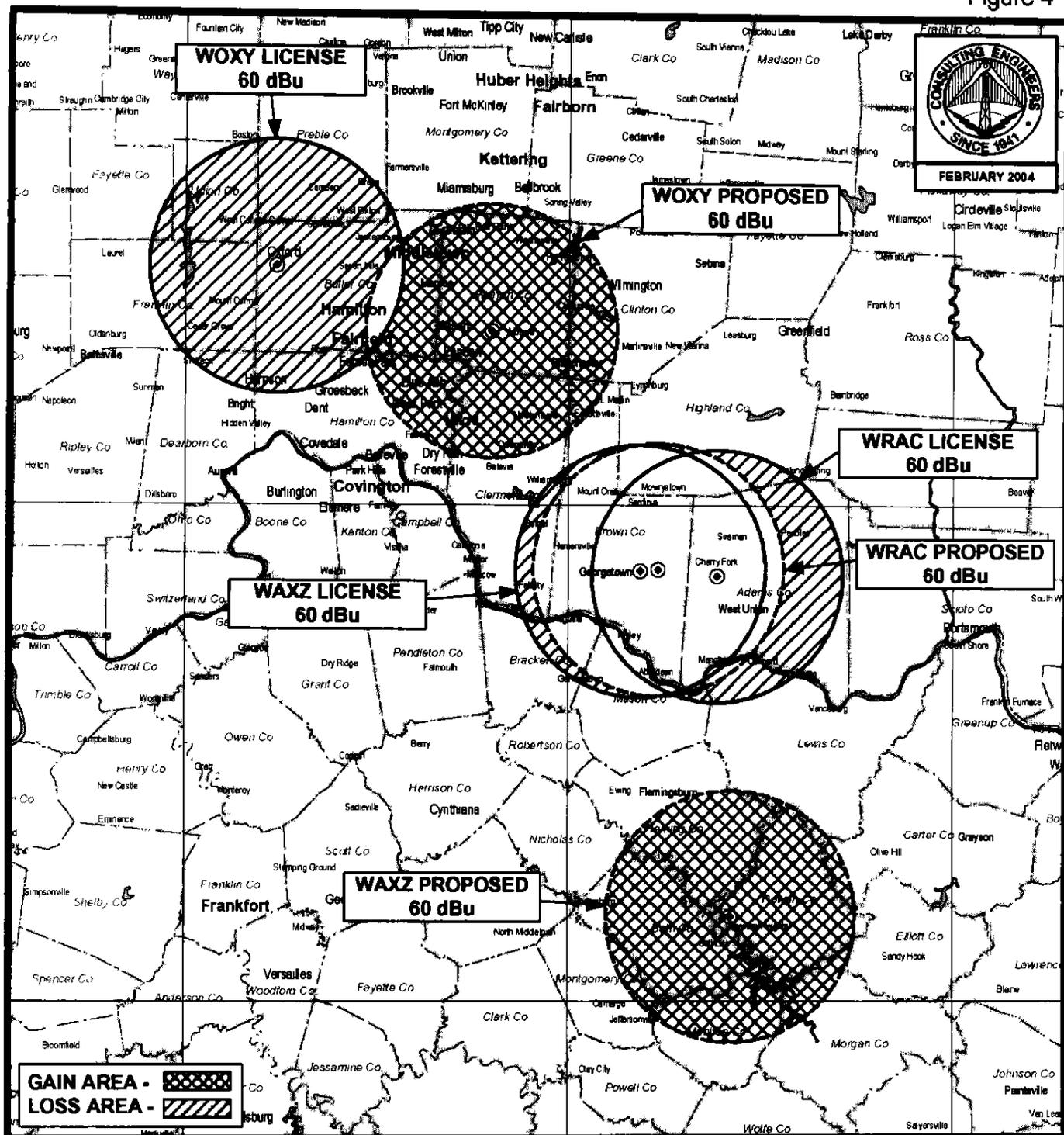
Figure 3B



AREA-TO-LOCATE

CHANNEL 276A
GEORGETOWN, OHIO

Figure 4

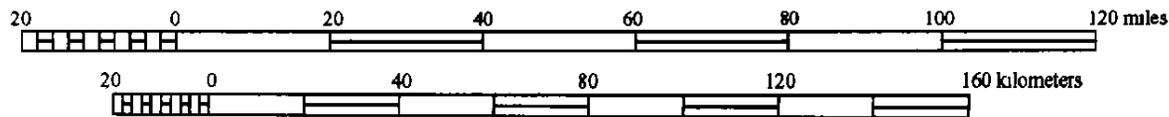
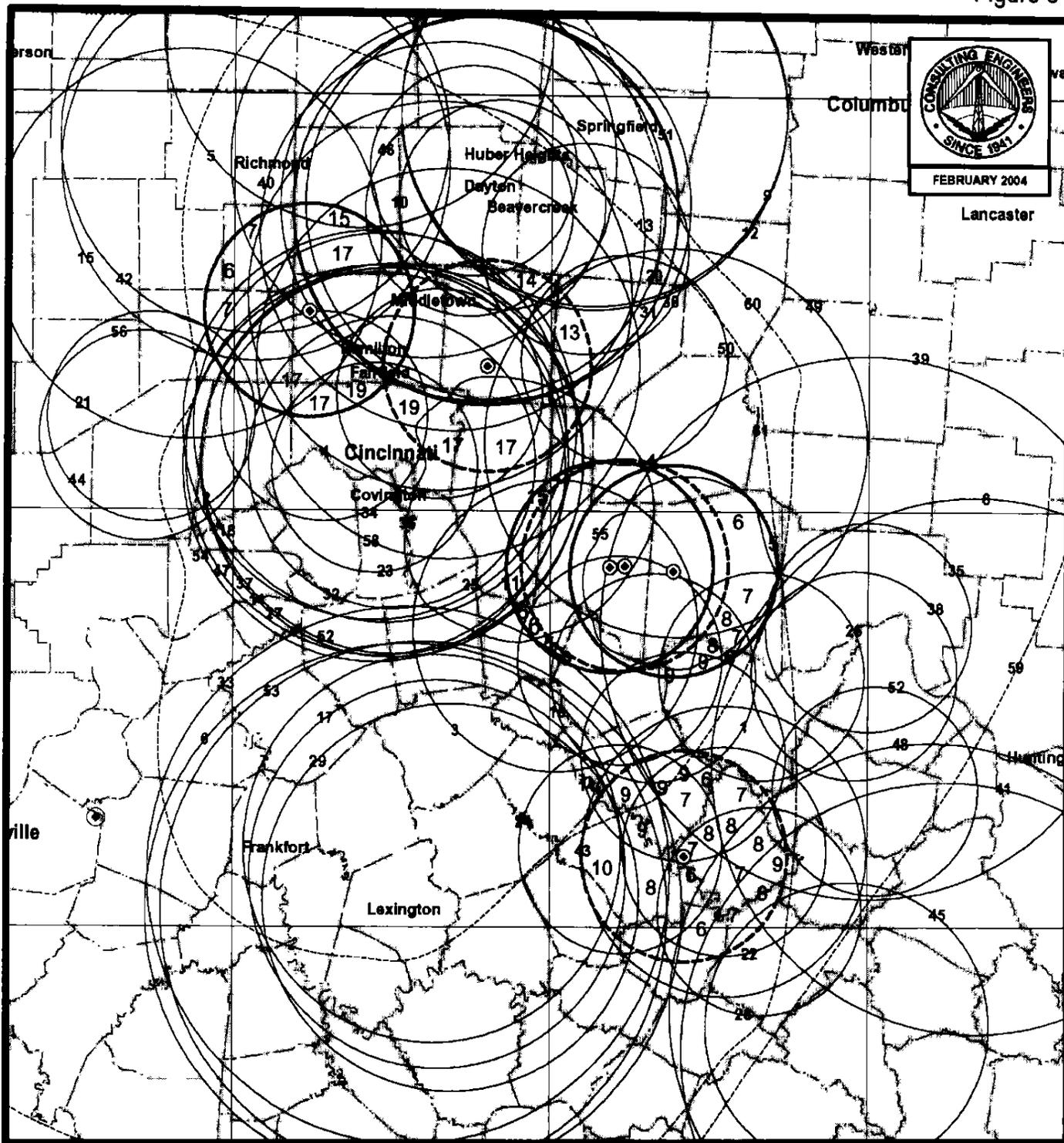


GAIN/LOSS AREAS

STATION WOXY
MASON, OHIO
CHANNEL 249A

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5



OTHER SERVICES IN GAIN/LOSS AREAS

**STATION WOXY
OXFORD, OHIO
CHANNEL 249A**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

STATION WOXY
MASON, OHIO
CHANNEL 249A

RADIO STATIONS CONSIDERED FOR
AVAILABLE RECEPTION SERVICES ANALYSIS

FM SERVICES: (Identifier #)	<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
1	WAGX	MANCHESTER	OH	267
2	WAKW	CINCINNATI	OH	227
3	WAOL	RIPLEY	OH	258
4	WAQZ	LEBANON	OH	247
5	WBKI	GREENVILLE	OH	293
6	WBUL	LEXINGTON	KY	251
7	WBVX	CARLISLE	KY	221
8	WDGG	ASHLAND	KY	229
9	WDHT	SPRINGFIELD	OH	275
10	WDKF	ENGLEWOOD	OH	233
11	WEBN	CINCINNATI	OH	274
12	WEEC	SPRINGFIELD	OH	264
13	WFCJ	MIAMISBURG	OH	229
14	WFLE	FLEMINGSBURG	KY	236
15	WFMG	RICHMOND	IN	267
16	WFTM	MAYSVILLE	KY	240
17	WGKS	PARIS	KY	245
18	WGRR	HAMILTON	OH	278
19	WGTZ	EATON	OH	225
20	WHKO	DAYTON	OH	256
21	WIFE	CONNERSVILLE	IN	262
22	WIKO	MOREHEAD	KY	242
23	WIZF	ERLANGER	KY	265
24	WKCA	OWINGSVILLE	KY	299
25	WKFS	MILFORD	OH	296
26	WKKS	VANCEBURG	KY	285
27	WKRQ	CINCINNATI	OH	270
28	WLKS	WEST LIBERTY	KY	275
29	WLKT	LEXINGTON-FAYETTE	KY	283
30	WLQT	KETTERING	OH	260
31	WMMX	DAYTON	OH	299
32	WMOJ	FAIRFIELD	OH	235
33	WMXL	LEXINGTON	KY	233
34	WNLT	HARRISON	OH	282
35	WNXT	PORTSMOUTH	OH	257
36	WOBO	BATAVIA	OH	204
37	WOFX	CINCINNATI	OH	223

FM SERVICES:	<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
38	WOKE	GARRISON	KY	252
39	WPAY	PORTSMOUTH	OH	281
40	WPFB	MIDDLETOWN	OH	290
41	WQHY	PRESTONSBURG	KY	238
42	WQLK	RICHMOND	IN	241
43	WQXX	MOREHEAD	KY	291
44	WRBI	BATESVILLE	IN	280
45	WRLV	SALYERSVILLE	KY	247
46	WROU	WEST CARROLLTON	OH	221
47	WRRM	CINCINNATI	OH	253
48	WSIP	PAINTSVILLE	KY	255
49	WSRW	HILLSBORO	OH	294
50	WSWO	WILMINGTON	OH	272
51	WTUE	DAYTON	OH	284
52	WUBE	CINCINNATI	OH	286
53	WVLK	LEXINGTON	KY	225
54	WVMX	CINCINNATI	OH	231
55	WVXW	WEST UNION	OH	208
56	WXCH	VERSAILLES	IN	276
57	WXEG	BEAVERCREEK	OH	280
58	WYGY	HAMILTON	OH	243

AM SERVICES:	<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
59	WLW	CINCINNATI	OH	700
60	WSAI	CINCINNATI	OH	1530
61	WHAS	LOUISVILLE	KY	840

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
OXFORD, MASON, WEST UNION AND GEORGETOWN, OHIO
AND SALT LICK, KENTUCKY

Tabulation of Areas, Populations
And Reception Services Within 1 mV/m Coverage Contours

I. Population and Land Area Within 1 mV/m Contours

Facilities	Within 1 mV/m Contour	
	2000 Census Population	Area (km ²)
Authorized Ch 249A Oxford, OH	267,791	2,516
Authorized Ch 249A Georgetown, OH	82,089	2,516
Authorized Ch 276A West Union, OH	58,596	2,516
Proposed Ch. 249A Mason, OH	667,119	2,516
Proposed Ch. 249A Salt Lick, KY	45,185	2,516
Proposed Ch. 276A Georgetown, OH	73,108	2,516

II. Population and Land Area Within Gain and Loss Areas

Area	Within 1 mV/m Contour	
	2000 Census Population	Area (km ²)
Gain	671,710	4,963
Loss	248,531	3,389
"Net" Gain	423,179	1,574

III. Available Reception Services Within Gain and Loss Areas

Area	No. of Services	Within 1 mV/m Contour	
		2000 Census Population	Area (km ²)
Gain	5 or more	671,695	4,960
	4	15	3
<i>Total</i>		<i>671,710</i>	<i>4,963</i>

Area	No. of Services	Within 1 mV/m Contour	
		2000 Census Population	Area (km ²)
Loss	5 or more	248,531	3,389
<i>Total</i>		<i>248,531</i>	<i>3,389</i>