

ORIGINAL

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

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In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Groesbeck and Tennessee Colony, Texas))

MB Docket No. 05-47
RM-11157
RM-11179

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Federal Communications Commission
Office of Secretary

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

COUNTERPROPOSAL

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SUMMARY

This Counterproposal is filed on behalf of Cumulus Licensing LLC ("Cumulus"), the licensee of Stations KBED(FM), Oil City, Louisiana, and KRMD-FM, Shreveport, Louisiana. Cumulus is advancing this proposal in order preserve the operation of Station KBED(FM) after being ordered off the air and effectively off of Channel 300 due to interference caused by Channel 300 to the navigational equipment used by the aircraft at Barksdale Air Force Base. In addition, grant of this proposal will provide a first local service to the community of Waskom, Texas. The consent statements of the licensees of the Stations that are not owned by Cumulus are attached to this Counterproposal. In addition, Cumulus is requesting that the Commission deviate from its procedural policy, and accept and expedite this proposal even though MB Docket No. 04-417 has not yet been dismissed. That proceeding proposes an allotment at either Center, Texas or Logansport, Louisiana. Cumulus has obtained certification from all of the parties that have expressed interests in either Center or Logansport that they are withdrawing these expressions of interest for expenses. This procedural policy exception is necessary in order to ensure that the only existing service at Oil City, Louisiana is preserved and that the Commission adhere to its highest priority, "provision for all existing service." *See Further Notice of Proposed Rule Making and Third Report, Memorandum Opinion and Order* in Docket No. 14185. 40 FCC 747 (1963).

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COUNTERPROPOSAL

Cumulus Licensing LLC (“Cumulus”), licensee of Stations KBED(FM) (formerly, KVMA-FM),² Oil City Louisiana,³ and KRMD-FM, Shreveport, Louisiana, by its counsel, hereby submits this counterproposal to the *Notice of Proposed Rule Making* (“NPRM”), DA 05-310 (rel. Feb. 7, 2005) in the above-captioned proceeding. As explained in more detail below, Cumulus is advancing this proposal in order preserve the operation of Station KBED(FM) after being ordered off the air and permanently off of Channel 300 due to interference caused by Channel 300 to the navigational equipment used by the aircraft at Barksdale Air Force Base. In addition, grant of this proposal will provide a first local service to the community of Waskom,

¹ Pursuant to the Public Notice released on March 8, 2005 (Report No. 2695), the proposal to allot Channel 299A at Groesbeck, Texas, was treated as a counterproposal in this proceeding. However, Charles Crawford is the proponent for both of the conflicting proposals at Groesbeck and Tennessee Colony. This conflict was presumably inadvertent on the part of the proponent, Crawford, and inadvertently proposed by the Commission. Thus, the Commission should require Crawford to choose between Groesbeck and Tennessee Colony, Texas.

² Effective March 30, 2005, the call sign of KVMA-FM was changed to KBED(FM).

³ The rule making reallocating Station KBED(FM) from Magnolia, Arkansas to Oil City, Louisiana is not final due to a pending Application for Review. See MB Docket Number 02-199.

Texas. The following amendments to the FM Table of Allotments are requested (listed alphabetically):

Community	Channel	
	Existing	Proposed
Dubach, Louisiana	249C1	249C2
Natchitoches, Louisiana	247C3, 264C3	248A, 264C3
Oil City, Louisiana	300C2	266C
Shreveport, Louisiana	229C, 233C, 243C1, 259C2, 266C, 275C2	229C, 233C, 243C1, 259C2, 275C2
Longview, Texas	247C2, 289C	289C, 300C2
Nacogdoches, Texas	221A, 277C2, 299C2	221A, 277C2, 299C3
Waskom, Texas	--	247C2

In support hereof, Cumulus states as follows:

I. PRELIMINARY MATTERS

1. On January 12, 2005, Cumulus was ordered by the Commission to discontinue operation of Station KBED(FM) immediately due to interference to navigational equipment used by aircraft at the Barksdale Air Force Base.⁴ The following day, January 13, 2005, Cumulus filed a request for special temporary authority to operate on Channel 263 at Oil City until a permanent solution is reached.⁵ This request is still pending. In the interim, Cumulus has diligently been searching for a permanent solution. This counterproposal provides that solution. Cumulus recognizes that this proposal is contingent on the dismissal of proposals, which have been withdrawn in another proceeding,⁶ but Cumulus urges the Commission to take into account the exceptional circumstances of Station KBED(FM) and to deviate from its normal policy of

⁴ See Letter from James Bradshaw, Deputy Chief, Audio Division, Media Bureau, to Mark N. Lipp, Esq., counsel to Cumulus Licensing LLC (January 12, 2005) (the "Bradshaw Letter"). This letter is attached as Attachment 1.

⁵ See Letter from Mark N. Lipp, Esq., counsel to Cumulus Licensing LLC, to Marlene H. Dortch, Esq., Secretary, Federal Communications Commission (January 13, 2005) and Supplement (February 15, 2005). See Attachment 2.

⁶ See MB Docket Number 04-317.

requiring proposals to be technically correct and substantially complete at the time they are filed. The Commission should, to a reasonable extent, be willing to waive one of its procedural rules in order to ensure that an existing station does not lose its channel and a community does not lose its only local service. The Commission has consistently held that retention of first local service at a community falls under priority 3.⁷ Further, the fact that an existing station may lose its channel is an even higher priority. Under the original FM priorities, the first priority was the provision of a channel for all existing stations.⁸ In the late 1980s, the Commission determined that this priority was no longer necessary because all existing stations had channels. That is exactly the case for all stations except Station KBED(FM) because the practical effect of the Bradshaw Letter and the incurable problems associated with Channel 300 at Oil City is to leave Station KBED(FM) without a channel. Thus, this situation warrants consideration under the highest FM priority.⁹

2. In addition, Cumulus requests that the Commission expedite this proceeding. Pursuant to the Bradshaw Letter, Station KBED(FM) has been off the air since January 12, 2005. Therefore, pursuant to Section 73.1740(c) of the Commission's Rules, Cumulus must resume broadcasting on Station KBED(FM) by January 12, 2006 in order to avoid forfeiting the Station's authorization and depriving Oil City of its only local service.

3. This proposal involves changes to two other stations (KTBQ(FM), Nacogdoches, Texas, and KDBH-FM, Natchitoches, Louisiana), and one vacant allotment. Cumulus has reached agreement with the licensees of these stations for the changes proposed herein and their

⁷ See *Application of Pacific Broadcasting of Missouri, LLC, Refugio, Texas*, 18 FCC Rcd 2291, ¶ 7 (2003); *Potts Camp and Saltillo, Mississippi*, 13 FCC Rcd 11909, ¶ 6 (1998); *app. for review denied*, 16 FCC Rcd 16116 (2001).

⁸ The original first priority was the "provision for all existing FM stations." See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) ("*FM Priorities*"). The priorities were first set out in the 1962 *Further Notice of Proposed Rule Making* in Docket No. 14185, and were later incorporated by reference by paragraph 25 of the *Third Report, Memorandum Opinion and Order*, the document which adopted the Table. 40 FCC 747 (1963).

⁹ *Id.*

consent statements are attached hereto as Attachment 3. The underlying agreements provide that Cumulus will reimburse the licensees for the costs in making the changes, and Cumulus hereby states that it will do so.

4. This proposal also requires the dismissal of the proposals advanced in MB Docket No. 04-317 (Center, Texas, and Logansport, Louisiana). Cumulus has contacted all of the parties that have filed an expression of interest in that proceeding and agreed to reimburse each of them for their legitimate and prudent expenses if they withdraw their expression of interest. Cumulus provides the statements which comply with Section 1.420(j) of the Commission's Rules. See Attachment 4. In an extraordinary show of support for a fellow broadcaster, these parties, Noalmark Broadcasting Corporation, Team Broadcasting Co., Inc., Charles Crawford, and Logansport Broadcasting, were willing to withdraw for reimbursement of their expenses due to the plight Cumulus finds itself in. However, even if the parties did not withdraw, and even though the comment date in that proceeding is closed, the Commission should make an exception to its procedural policy in order to avoid depriving an existing station and a community of its only channel. This would only be at the expense of a channel that has yet to be allotted to either Center, Texas, or Logansport, Louisiana and for which the parties have withdrawn their interest.

5. Cumulus hereby states that pursuant to Section 1.420(j), it has not paid nor promised to pay, in any agreement, any licensee, permittee or applicant for withdrawing an expression of interest, dismissing an application or forbearing to file an expression of interest or application in excess of legitimate and prudent expenses.

II. CONFLICT WITH THE *NPRM*

6. As indicated in the attached Engineering Statement, this proposal conflicts with the *NPRM* proposal to allot Channel 300A to Tennessee Colony, Texas, due to the proposed

allotment of Channel 300C2 to Longview, Texas. This proposal will provide a first local service at Waskom, Texas (2000 U.S. Census pop. 2,068) and retain the only local service at Oil City, Louisiana (2000 U.S. Census pop. 1,219), both of which fall within priority 3. This is preferred over a first local service to Tennessee Colony, Texas (pop. 300) under priority 3.¹⁰ See *FM Priorities, supra*.

III. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES

A. STATION KBED(FM), OIL CITY, LOUISIANA TO WASKOM, TEXAS

1. Technical Studies

7. As indicated in the attached channel study, Exhibit 1, Channel 247C2 can be allotted to Waskom, Texas, in compliance with the Commission's spacing rules, provided that a change is made at Longview, Texas, and Natchitoches, Louisiana.¹¹ These changes will be discussed below. From the proposed site the station will provide a 70 dBu signal to Waskom. See Exhibit 2.

2. Change in Community of License

8. In *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License ("Community of License")*, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990), the Commission stated that in order to grant a change in community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service;

¹⁰ Under priority 3, a first local service to Waskom, and retention of a first local service at Oil City, is preferred over a first local service to the smaller community of Tennessee Colony. See e.g., *Ardmore, Alabama, et. al.*, 17 FCC Rcd 16332, 16334-35 (2002); *Three Oaks and Bridgman, Michigan*, 5 FCC Rcd 1004, 1004 (1990).

¹¹ The channel study shows a short spacing to Channel 248A at Logansport, Louisiana and to Channel 248A at Center, Texas. These channels are part of the pending rule making in MB Docket Number 04-317 and the relationship to this proceeding will be discussed below.

and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities.

9. Here, the attached channel study, Exhibit 1, demonstrates that the proposed allotment of Channel 247C2 at Waskom is mutually exclusive with the current allotment of Channel 300C2 at Oil City due to the IF spacing requirement in Section 73.207(b) of the Commission's Rules. Oil City will retain existing local service, because, as discussed below, Station KRMD-FM proposes to change its community of license from Shreveport to Oil City. This proposal will provide a first local service at Waskom, Texas (2000 U.S. Census pop. 2,068) which falls within priority 3. This is preferred over the retention of a fourteenth at Shreveport (2000 U.S. Census pop. 200,145) under priority 4.¹² The allotment of Channel 247C2 to Waskom will not result in a gain or loss of service because the channel is proposed at KBED(FM)'s current site.

10. Neither Waskom nor Oil City are located within an urbanized area and both the current and proposed 70 dBu contours cover more than 50% of the Shreveport Urbanized Area. Therefore, this relocation does not implicate the Commission's policy concerning the migration of stations from underserved rural areas to well-served urban areas. *See Kankakee and Park Forest, Illinois*, 16 FCC Rcd 6768, 6768 (2001); *Dayton, Incline Village and Reno, Nevada*, 15 FCC Rcd 22461 (2000); *St. Maries, Idaho and Spokane, Washington*, 14 FCC Rcd 17012 (1999); *Boulder and Lafayette, Colorado*, 12 FCC Rcd 583 (1997); *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*").

¹² As discussed below, KBED(FM)'s move to Waskom requires KRMD-FM to move to Oil City in order to ensure that Oil City retains local service. Ultimately, Shreveport, Louisiana, will lose a local service. Therefore, the proper analysis here is to compare the community of Shreveport, Louisiana, which is losing a station, to the community of Waskom, Texas, which is obtaining a first local service.

11. Waskom enjoys the attributes that the Commission traditionally associates with a community. Waskom is listed in the 2000 U.S. Census with a population of 2,068 persons and therefore is presumed to have the status of a community for allotment purposes. *See Arnold and Columbia, California, 7 FCC Rcd 6302 (1992).*

12. Waskom was established in 1850 and was originally known as Powellton. The name of the community was changed to Waskom Station in 1872 to honor the man who was instrumental in bringing the railroad to the community. Waskom has its own government and elected officials. Waskom also has a volunteer fire department, water works, and sanitation facility. The zip code assigned to Waskom is 75692 and the U.S. Postal Service operates an office in Waskom. The Waskom Independent School District administers the schools in Waskom, which include Waskom Elementary School, Waskom Middle School, and Waskom High School. The Waskom Review is the local newspaper in Waskom. Waskom is also home to a number of retail and commercial establishments. Many of these businesses identify with the community by using "Waskom" in their name, including New Waskom Café, Professional Denture Clinic of Waskom, Waskom Automotive Technical Service, Waskom Book Store, Waskom Cemetery Association, Waskom Dental Associates, Waskom Family Health Center, Waskom Hardware & Feed CO, and Waskom Insurance. Waskom is also home to the Waskom Public Library and community organizations, including the Waskom Masonic Lodge. *See Attachment 5.*

13. Cumulus reiterates that as the licensee of KBED(FM), it will apply for Channel 247C2 to serve Waskom and construct the facility if a permit is granted.

B. VACANT CHANNEL 247C2, LONGVIEW, TEXAS

14. In order to allot Channel 247C2 to Waskom, vacant Channel 247C2, Longview, Texas, must change to Channel 300C2. Channel 300C2 can be allotted to Longview at a new

reference point in compliance with the Commission's spacing rules, provided that a change is made at Nacogdoches, Texas. *See* Exhibit 7. This change will be discussed below. At the new site, a 70 dBu contour will be placed over Longview. *See* Exhibit 8

C. STATION KTBQ(FM), NACOGDOCHES, TEXAS

15. In order to allot vacant Channel 300C2 to Longview, Texas, Station KTBQ(FM), Nacogdoches, Texas, must downgrade from 299C2 to 299C3. As indicated in the attached channel study, Exhibit 9, Channel 299C3 can be allotted to Nacogdoches, at a new transmitter site in compliance with the Commission's spacing rules. From the proposed site the station will provide a 70 dBu signal to Nacogdoches. *See* Exhibit 10. The allotment of Channel 299C3 to Nacogdoches will result in a net loss in 60 dBu service to 62,045 people. *See* Exhibit 11. The loss area will continue to receive adequate aural service. *See* Exhibits 11a and 11b.

16. Cumulus has entered into an agreement with the licensee of KTBQ(FM), Capstar TX Limited Partnership, regarding the change. The licensee's consent to the change in channel, and its intention to apply for Channel 299C3 to serve Nacogdoches and construct the facility if a permit is granted, is attached hereto in Attachment 3. Cumulus reiterates that it will reimburse the licensee for its expenses in making the change in channel.

D. STATION KDBH-FM, NATCHITOCHEES, LOUISIANA

17. In order to allot Channel 247C2 to Oil City, Station KDBH-FM, Natchitoches, Louisiana, must change its channel from 247C3 to 248A. Channel 248A can be allotted to Natchitoches at a new transmitter site in compliance with the Commission's spacing rules, provided that a change is made at Dubach, Louisiana.¹³ *See* Exhibit 3. This change will be discussed below. At this site, a 70 dBu contour will be placed over Natchitoches. *See* Exhibit 4.

¹³ The channel study shows a short spacing to Channel 248A at Logansport, Louisiana and to Channel 248A at Center, Texas. These channels are part of the pending rule making in MB Docket Number 04-317 and the relationship to this proceeding will be discussed below.

The allotment of Channel 248A to Natchitoches will result in a net loss in 60 dBu service to 4,396 people. *See* Exhibit 6. The loss area will continue to receive adequate aural service. *See* Exhibits 6a and 6b.

18. Cumulus has entered into an agreement with the licensee of KDBH-FM, Baldrige-Dumas Communications, Inc., regarding the change. The licensee's consent to the change in channel, and its intention to apply for Channel 248A to serve Natchitoches and construct the facility if a permit is granted, is attached hereto in Attachment 3. Cumulus reiterates that it will reimburse the licensee for its expenses in making the change in channel.

E. STATION KPCH(FM), DUBACH, LOUISIANA

19. In order to allot Channel 248A to Natchitoches, Louisiana, Station KPCH(FM), Dubach, Louisiana, must have its channel downgraded from 249C1 to 249C2. Channel 249C1 was allotted as a result of the grant of its permit (BPH-20020702ABF). That permit has not yet been implemented and the licensee has decided not to construct the Class C1 facilities. Station KPCH(FM) is currently operating as a Class C2 facility and the allotment of Channel 249C2 to Dubach at the current transmitter site would reflect its current use. *See* Exhibit 5. At this site, a 70 dBu contour is placed over Dubach.

20. Communications Capital Company II of Louisiana, LLC, the licensee of KPCH(FM), has provided a statement consenting to the change in the class of channel, and its intention to apply for Channel 249C2 to serve Dubach and construct the facility if a permit is necessary. *See* Attachment 3. Cumulus reiterates that it will reimburse the licensee if there are any expenses in making the change in channel.

F. STATION KRMD-FM, SHREVEPORT TO OIL CITY, LOUISIANA

21. In order to avoid depriving Oil City, of its only local service, Station KRMD-FM, Shreveport, Louisiana, proposes to change its community of license to Oil City, Louisiana. As

indicated in the attached channel study, Exhibit 12, Channel 266C can be allotted to Oil City at a new transmitter site in compliance with the Commission's spacing rules. From the proposed site the station will provide a 70 dBu signal to Oil City. See Exhibit 13. The allotment of Channel 266C to Oil City will result in a net loss in 60 dBu service to 56,303 people. See Exhibit 14. The loss area will continue to receive adequate aural service. See Exhibits 14a and 14b. In addition a fourth aural service will be provided to 36 persons and a fifth aural to 98 persons.

22. The relocation of KRMD-FM from Shreveport to Oil City complies with the Commission's policy in *Community of License, supra*. The attached channel study, Exhibit 12, demonstrates that the proposed allotment of Channel 266C at Oil City is mutually exclusive with the current allotment of Channel 266C at Shreveport. Shreveport will retain existing local service from thirteen other stations. As previously discussed, this proposal will provide a first local service at Waskom, Texas (2000 U.S. Census pop. 2,068) which falls within priority 3. This is preferred over the retention of a fourteenth at Shreveport (2000 U.S. Census pop. 200,145) under priority 4. Shreveport is the central city of the Shreveport Urbanized Area and Oil City is not located in the Shreveport Urbanized Area. Further, Cumulus is not seeking a first local service preference at Oil City. Thus, no *Tuck* showing is required.

23. Cumulus reiterates that as the licensee of KRMD-FM, it will apply for Channel 266C to serve Oil City and construct the facility if a permit is granted.

G. MB DOCKET NUMBER 04-317

24. The allotment of Channel 247C2 to Waskom, Texas and Channel 248A to Natchitoches, Louisiana, both conflict with the mutually exclusive proposals in MB Docket Number 04-317 to allot Channel 248A to Center, Texas, or Channel 248A to Logansport, Louisiana. In that docket, Team Broadcasting Company, Inc., Charles Crawford, and Noalmark Broadcasting Corporation have filed expressions of interest for Channel 248A at Center, Texas,

and Logansport Broadcasting has filed an expression of interest for Channel 248A at Logansport, Louisiana.

25. Cumulus has contacted the parties that have filed expressions of interest in that proceeding and agreed to reimburse each of them for their legitimate and prudent expenses if they withdraw their expression of interest. Pursuant to Section 1.420(i), attached hereto as Attachment 6, is Cumulus' affidavit regarding such payments.

26. Cumulus recognizes that this proposal is contingent on the dismissal of proposals which have been withdrawn in another proceeding, and that it is the Commission's policy not to accept proposals that are contingent upon final action in another rule making proceeding.¹⁴ However, as previously discussed, the exceptional circumstances regarding Station KBED(FM) justify deviation from this policy in this proceeding. Pursuant to the Bradshaw Letter, Cumulus discontinued operation of Station KBED(FM) on January 12, 2005, due to interference to navigational equipment at the Barksdale Air Force Base. This type of interference is rare and was caused through no fault of Cumulus. Cumulus had been working with Barksdale and with consulting engineers for over several months to attempt to find a solution. This is the only solution Cumulus has found to date. Further, time is of the essence because Station KBED(FM) must resume service by January 12, 2006 in order to avoid forfeiting its authorization and depriving Oil City of its only local service. In view of the willingness of all parties in MB Docket No. 04-317 to withdraw their interest and in view of the need to file this proposal on the comment date in this proceeding, as well as the need to return Station KBED(FM) to the air by January 12, 2006, it would not be in the public interest in this exceptional circumstance to

¹⁴ See, e.g., *Saint Joseph, Louisiana, et al.*, 18 FCC Rcd 22 (2003); *pet. for recon. pending*; *Auburn, Northport, Tuscaloosa, et al.*, 17 FCC Rcd 16227 (2002); *pet. for recon granted*, 18 FCC Rcd 10333 (2003).

require Cumulus to wait for the dismissal of MB Docket No. 04-317 to become effective before submitting this proposal.

H. CONCLUSION

27. Grant of this Counterproposal is in the public interest because it will ensure that Station KBED(FM) does not lose its channel and that Oil City does not lose its only local service. Further, the community of Waskom, Texas will be provided with a first local service. While, grant of this proposal requires that the Commission deviate from one of its normal procedural policies, that deviation is warranted in order to ensure that a station and community does not lose its only channel, which is consistent with the Commission's priorities. Accordingly, the Commission should grant this Counterproposal.

Respectfully submitted,

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March 31, 2005

ENGINEERING EXHIBIT

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

TECHNICAL STATEMENT

1. This technical statement and attachments were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of station KBED, Channel 300C1, Magnolia, ^{Arkansas} Louisiana. Cumulus herein submits a counterproposal to the requested allotment of Channel 300A to Tennessee Colony, Texas. The counterproposal is to enable a change of channels for KBED, along with other changes, to enable Cumulus to return KBED to operation.² Cumulus herein proposes the following changes to the Commission's Table of Allotments: the substitution of Channel 247C2 for Channel 300C2 at Oil City, Louisiana, and the re-allotment of the channel to Waskom, Texas as that community's first local service. Since KBED is the only aural service in Oil City, Louisiana, Cumulus proposes to re-allot Channel 266C from Shreveport, Louisiana to Oil City, Louisiana, and requests that station KRMD-FM be ordered to change its community of license.³

2. In order to accommodate the Channel 247C2 allotment at Waskom, Texas, it is necessary to make the following additional changes: the substitution of Channel 300C2 for the

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- 1) KBED was ordered to Channel 300C2 at Oil City, Louisiana. KBED had commenced operation at Oil City, Louisiana pursuant to automatic program test authority with the facilities authorized in BPH-20030610ADI, and has filed an application for license BLH-20040830ACO.
 - 2) KBED is presently off the air due to interference issues involving FAA Nav aids at Barksdale Air Force base near Shreveport, Louisiana.
 - 3) Cumulus is the licensee of KRMD-FM.

vacant and unapplied for Channel 247C2 at Longview, Texas (this substitution is mutually exclusive with the proposed Tennessee Colony, Texas request); the substitution of Channel 248A for Channel 247C3 at Natchitoches, Louisiana; and the substitution of Channel 299C3 for Channel 299C2 at Nacogdoches, Texas. These changes and additional details are indicated below.⁴

REQUEST

3. Channel 247C2 can be substituted for Channel 300C2 at Oil City, Louisiana, and the channel re-allotted to Waskom, Texas at geographic coordinates North Latitude 32° 29' 36" and West Longitude 93° 45' 55". This represents a site restriction of 31 kilometers east of the community in order to specify the present KBED site on Channel 300C2 at Oil City. Attached as Exhibit #1 is a §73.207 spacing study showing Channel 247C2, at the proposed site, meets the Commission's minimum distance separation requirements to all other licensed, authorized or proposed facilities, with the exception of KDBH-FM, Natchitoches, Louisiana, which will move to Channel 248A, and the vacant Channel 247C2 at Longview, Texas, which will move to Channel 300C2. From the proposed allocation site, a 70 dBu contour will be delivered to Waskom, Texas, as indicated on Exhibit #2. Further, since the authorized KBED site is specified, there is no gain or loss of service associated with this change.

4) It is noted that the proposed use of Channel 247C2 at Waskom, Texas, and Channel 248A at Natchitoches, Louisiana, is mutually exclusive with the proposed Channel 248A allotment at Center, Texas (and a counterproposal for Channel 248A at Logansport, Louisiana).

4. In order to allot Channel 247C2 to Waskom, Texas, it is necessary to substitute Channel 248A for Channel 247C3 at Natchitoches, Louisiana. Channel 248A can be allotted to Natchitoches, Louisiana at geographic coordinates North Latitude 31° 46' 09" and West Longitude 93° 01' 38". This substitution will require station KDBH-FM to relocate to a new site. The licensee of KDBH-FM has consented to the change in channel and site. This represents a site restriction of 7.5 kilometers east-northeast from the community to avoid shortspacing KBED on Channel 247C2 at Waskom, Texas and KPCH, Channel 249C2 at Dubach, Louisiana. Exhibit #3 is a §73.207 spacing study for Channel 248A at Natchitoches, Louisiana. Exhibit #4 is a map showing the proposed Channel 248A facility will provide a 70 dBu contour over Natchitoches, Louisiana. It is noted that the FM Table of Allotments shows Channel 249C1 at Dubach, Louisiana. There was an outstanding permit to upgrade KPCH to Channel 249C1 (BPH-20020702ABF), however, the permit was not implemented and has since expired. Cumulus requests that Channel 249C1 be deleted from Dubach, Louisiana, and that Channel 249C2 be added to the table. The proposed allocation site for Channel 249C2 at Dubach, Louisiana, is North Latitude 32° 40' 09" and West Longitude 92° 37' 58".⁵ Exhibit #5 shows Channel 249C2 meets the Commission's minimum distance separation requirements at the KPCH operational site.

5. As a result of the slight relocation and downgrade of the channel at Natchitoches, there is a small amount of gain and loss. As indicated on Exhibit #6, the substitution of Channel 248A

5) KPCH is operating with the facilities authorized in BPH-20040811AAE. This permit corrected the coordinates of the station. An application for license to cover the permit has been submitted BLH-20050222ACP.

for Channel 247C3 will create a loss of service to 4,392 persons in 954.5 square kilometers.⁶

There are a minimum of five full stations providing service to the loss areas, as shown on Exhibits #6A and #6B.⁷ As such, each area is adequately served.

6. Further, in order to accommodate the allotment of Channel 247C2 to Waskom, Texas, Channel 300C2 must be substituted for Channel 247C2 at Longview, Texas. At present, Channel 247C2 at Longview, Texas is a vacant and unapplied for allotment. Channel 300C2 can be allotted to Longview, Texas at geographic coordinates North Latitude 32° 42' 01 and West Longitude 94° 40' 47". This represents a site restriction of 22 kilometers north-northeast of the community to avoid shortspacing the proposed allotment of Channel 299C3 at Nacogdoches, Texas⁸, and KISX, Channel 297C2, Whitehouse, Texas. As indicated on Exhibit #7, Channel 300C2 meets the Commission's minimum distance separation requirements from the proposed reference site. The shortage to the proposed Channel 300A at Tennessee Colony, Texas, is not considered, as this request is being filed as a counterproposal to the Tennessee Colony proposal. Exhibit #8 shows that, from the reference site, Channel 300C2 provides the requisite 70 dBu contour to 100% of the community of Longview. Since Channel 247C2 at Longview, Texas is a vacant, non-operational channel, no gain or loss review was undertaken.

-
- 6) Based on the operational facilities of KDBH-FM versus a maximum, non-terrain impacted maximum Class A facility from the proposed reference site.
 - 7) To determine services, all AM stations, and commercial and non-commercial FM stations in the area were reviewed. For AM Class A stations, the nighttime 0.5 mV/m contour was used for a service contour; all other AM stations nighttime interference free signals were calculated and used for service contributions. For FM commercial stations, maximum facilities were used for each Class, except A. Some Class A stations were considered 3.0 kilowatt Class A stations, while others were depicted as 6.0 kilowatt Class A stations, based on their operating facilities, or spacing review. Class C FM stations considered at minimum height of 451 meters. Class C0 stations at authorized height. All other classes of commercial FM stations at maximum for the class in this submission. Any non-commercial FM station's 60 dBu reference contour was determined from its licensed facility. FM contours assumed uniform terrain for all stations reviewed for service to gain and loss areas.
 - 8) Channel 299C3 is to be substituted for Channel 299C2 at Nacogdoches, Texas, as part of this proposal.

7. To accommodate the allotment of Channel 300C2 to Longview, Texas, it is requested that Channel 299C3 be substituted for Channel 299C2 at Nacogdoches, Texas, and that KTBQ be ordered to change its channel and transmitter site. Cumulus has reached an agreement with the license of KTBQ to change its site and channel/class. Channel 299C3 can be allotted to Nacogdoches, Texas, at geographic coordinates North Latitude 31° 38' 09" and West Longitude 94° 38' 50". This represents a site restriction of 2.4 kilometers north-northeast from the center of the community to avoid shortsapacing KQQK, Channel 300C, Beaumont, Texas. Exhibit #9 is a §73.207 spacing study which shows Channel 299C3 at the proposed reference site meets the Commission's minimum distance separation requirements. Exhibit #10 shows that from the reference site Channel 299C3 will provide the community of Nacogdoches, Texas with a 70 dBu contour.

8. As a result of the downgrade of this channel and site relocation, a loss area of 62,045 persons in 3,814.2 square kilometers will result, as shown on Exhibit #11. This area of loss will still receive service from a minimum of five other full time services, as shown on Exhibits #11A and #11B.⁹ As such, this loss area is considered to be adequately served.

9. Since KBDL is the only authorized station in Oil City, Louisiana, Cumulus also proposes to re-allot KRMD-FM, Channel 266C from Shreveport, Louisiana to Oil City, Louisiana as a replacement service. The removal of Channel 266C will not deprive Shreveport

9) See Note 7 supra.

of its only service since numerous stations will remain operational in the community.¹⁰ Channel 266C can be allotted to Oil City, Louisiana at geographic coordinates North Latitude 32° 40' 08" and West Longitude 93° 52' 45". This represents a site restriction of 13.1 kilometers southeast of the community to avoid shortspacing WRR, Channel 266C, Dallas, Texas; the proposed allotment of Channel 265A at Millerton, Oklahoma; KDEL-FM, Channel 265C3, Arkadelphia, Arkansas; and the proposed allotment of Channel 265A at Broken Bow, Oklahoma. Exhibit #12 is a §73.207 spacing study showing the channel meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. Exhibit #13 shows that a 70 dBu contour from a minimum Class C facility encompasses all of Oil City, Louisiana from the proposed reference site. The proposed allotment at Oil City, Louisiana, based on a minimum Class C facility from the reference site in comparison to a theoretical minimum Class C facility at the KRMD-FM licensed site will result in some areas of service gain and loss, as shown on Exhibit #14. A potential gain of 5,903 persons in 884.1 square kilometers will result. A loss area containing 62,206 persons in 873.7 square kilometers will also result, based on the re-allotment of the channel to Oil City, Louisiana. Both the gain and loss areas are serviced by a minimum of five full time services, as indicated on Exhibits #14A and #14B, with the exception of several small areas in the vicinity of Mansfield, Louisiana.¹¹ There will be a small area where the proposed Channel 266C at Oil City, Louisiana will provide a fourth and fifth service. The area of new fourth service contains 36 persons in 24.3 square kilometers. The area of fifth service contains 98 persons in 40.9 square kilometers.

10) The following stations are licensed to Sheveport; KDAQ, Channel 210C1; KSCL, Channel 217A; KXKS-FM, Channel 229C; KRUF, Channel 233C; KVKI-FM, Channel 243C1; KMJJ-FM, Channel 259C2; KVMA-FM, Channel 275C2; KEEL, 710 kHz; KOKA, 980 kHz; KWKH, 1130 kHz; KSYB, 1300 kHz; KRMD, 1340 kHz and KIOU, 1480 kHz.

11) See note 7 supra.

10. Therefore, Cumulus requests the following changes to the Commission's Table of Allotments:

Waskom, Texas

Present	Proposed
None	247C2

Oil City, Louisiana

Present	Proposed
300C2	266C

Shreveport, Louisiana

Present	Proposed
229C, 233C, 243C1, 259C2, 266C, 275C2	229C, 233C, 243C1, 259C2, 275C2

Natchitoches, Louisiana

Present	Proposed
247C3, 264C3	248A, 264C3

Dubach, Louisiana

Present	Proposed
249C1	249C2

Longview, Texas

Present	Proposed
247C2, 289C	289C, 300C2

Nacogdoches, Texas

Present
277C2, 299C2

Proposed
277C2, 299C3

11. Once Channel 247C2 is allotted to Waskom, Texas, and Channel 266C to Oil City, Louisiana, Cumulus will submit applications to relocate KBED to Waskom and KRMD-FM to Oil City.

12. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All data related to FM facilities was extracted from the CDBS database and all population data was extracted from the 2000 Census database. We assume no liability for errors or omissions in those databases that may be adverse to the requests contained herein.

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #1

Allocation study for Waskom, Texas
Using present KBED CP site as reference

REFERENCE 32 29 36 N CLASS = C2 DISPLAY DATES
93 45 55 W Current Spacings DATA 03-30-05
SEARCH 03-31-05
----- Channel 247 - 97.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng. Ant	Power	HAAT		
AD247	ADD 247C2	Waskom	TX 0.00	0.0	190.0	-190.00
	32 29 36	93 45 55	0.000 kW 0 M			
	> Change community of license for KBED Oil City, Louisiana					
980812	VAC 247C2	Longview	TX 90.98	270.1	190.0	-99.02
	32 29 30	94 44 00 N	50.000 kW	150 M		
	> to Channel 300C2 per instant counterproposal					
KDBHFM	LIC 247C3	Natchitoches	LA 103.53	137.5	177.0	-73.47
	31 48 17	93 01 27 CX	25.000 kW	67 M		
	Baldrige-Dumas Communications BLH-20020415AAL					
	> to Channel 248A per instant counterproposal					
RADD	ADD 248A	Logansport	LA 60.38	200.7	106.0	-45.62
	31 59 03	93 59 33	6.000 kW	100 M		
	Logansport Broadcasting					
	> proposal not considered by this instant request.					
KBED	CP -N 300C2	Oil City	LA 0.00	0.0	20.0	-20.00
	32 29 36	93 45 55 NCX	24.500 kW	163 M		
	Cumulus Licensing LLC					
	> subject station					
RADD	ADD 248A	Center	TX 91.57	199.4	106.0	-14.43
	31 42 51	94 05 13	6.000 kW	100 M		
	Team Broadcasting Company					
	> proposal withdrawn - not considered by this instant request					
RADD	ADD 248A	Center	TX 91.58	199.3	106.0	-14.42
	31 42 50	94 05 10	6.000 kW	100 M		
	Charles Crawford					
	> proposal not considered by this instant request.					
AD248	ADD 248A	Natchitoches	LA 106.29	139.0	106.0	0.29
	31 46 09	93 01 38	0.000 kW 0 M			
	> substitute for Channel 247C3.					
KJMG	LIC 247A	Bastrop	LA 174.54	82.9	166.0	8.54
	32 40 20	91 55 06 CN	5.900 kW	100 M		
	Holladay Broadcasting Of LA					
	BLH-19960906KD					
KAMDPM	LIC 246C2	Camden	AR 143.25	38.1	130.0	13.25
	33 30 14	92 48 38 CX	50.000 kW	139 M		
	Radio Works, Inc.					
	BLH-20020806AAD					
RADD	ADD 247A	Fort Towson	OK 211.15	318.1	166.0	45.15
	33 53 55	95 17 35	6.000 kW	100 M		
	Charles Crawford					

Graham Brock, Inc. - Broadcast Technical Consultants

Reference Site
Latitude: 32-29-36 N
Longitude: 093-45-55 W
ERP: 50,000 kW
Channel: 247C2

70 dBu RADIUS (MAXIMUM CLASS C3)

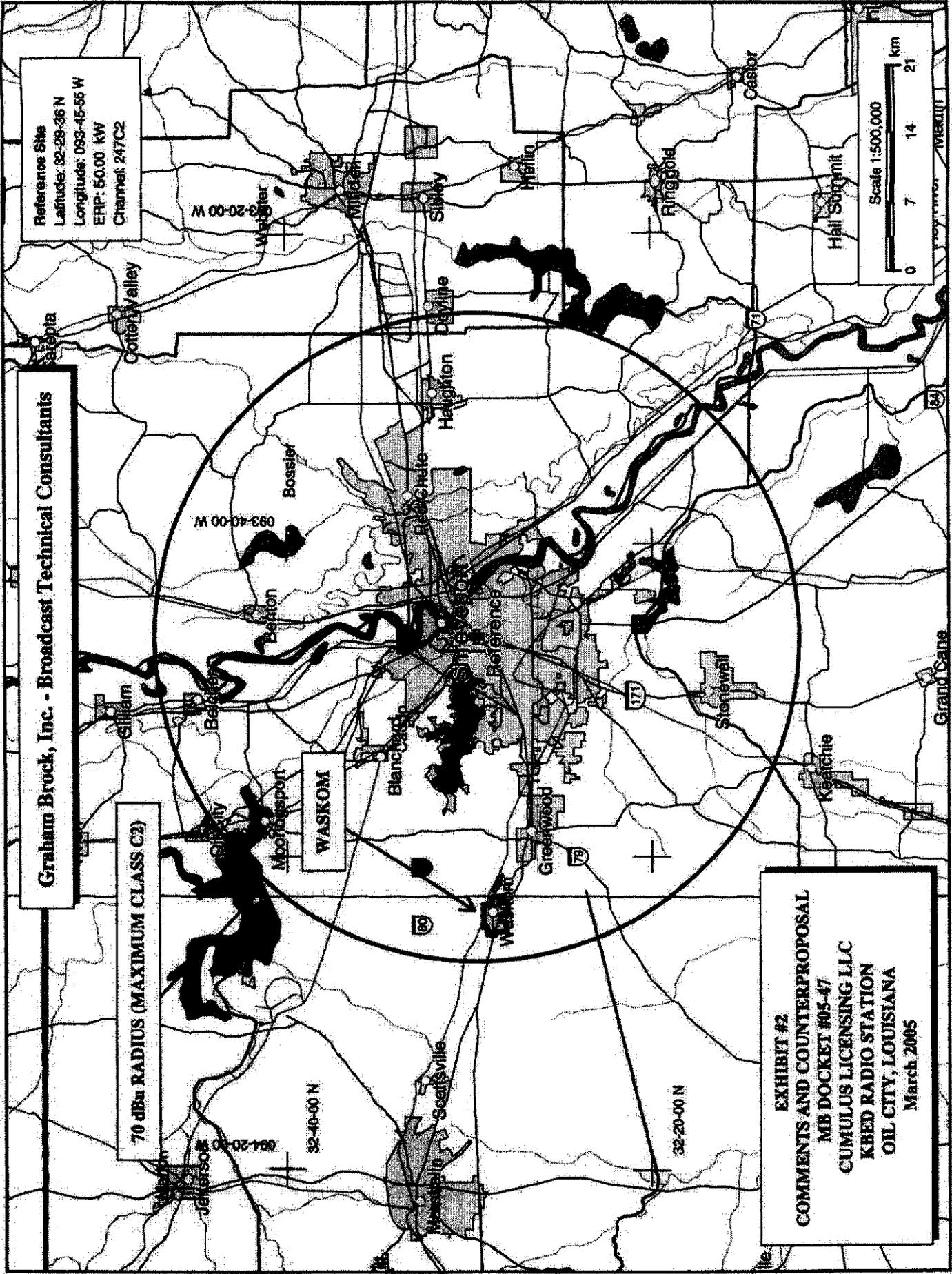


EXHIBIT #2
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #3

Allocation study for Natchitoches, Louisiana

Using proposed allocation site as reference

REFERENCE
31 46 09 N CLASS - A DISPLAY DATES
93 01 38 W Current Spacings DATA 03-30-05
SEARCH 03-31-05
----- Channel 248 - 97.5 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Power	HAAT		
AD248	ADD 248A	Natchitoches	LA 0.00	0.0	115.0	-115.00
	31 46 09	93 01 38	0.000 kW 0 M			
	> substitute for Channel 247C3					
KDBHF	LIC 247C3	Natchitoches	LA 3.95	4.2	89.0	-85.05
	31 48 17	93 01 27	25.000 kW	67 M		
	Baldrige-dumas Communications BLH-20020415AAL					
RADD	ADD 248A	Logansport	LA 94.39	285.0	115.0	-20.61
	31 59 03	93 59 33	6.000 kW	100 M		
	Logansport Broadcasting > proposal not considered by this instant request.					
ALLO	USE 249C1	Dubach	LA 114.22	6.6	133.0	-18.78
	32 47 32	92 53 08	100.000 kW	299 M		
	> un-used upgraded allotment to be downgraded to Channel 249C2					
RADD	ADD 248A	Center	TX 100.52	266.8	115.0	-14.48
	31 42 50	94 05 10	6.000 kW	100 M		
	Charles Crawford > proposal not considered by this instant request.					
RADD	ADD 248A	Center	TX 100.60	266.8	115.0	-14.40
	31 42 51	94 05 13	6.000 kW	100 M		
	Team Broadcasting Company > proposal withdrawn - not considered by this instant request					
AD247	ADD 247C2	Waskom	TX 106.29	319.4	106.0	0.29
	32 29 36	93 45 55	0.000 kW 0 M			
KPCH	LIC 249C2	Dubach	LA 106.40	20.4	106.0	0.40
	32 40 03	92 37 50	50.000 kW	139 M		
	Communications Capital Company BLH-19980714KC					
AD249C	ADD 249C2	Dubach	LA 106.50	20.2	106.0	0.50
	32 40 09	92 37 58	0.000 kW 0 M			
KPCH.C	CP 249C2	Dubach	LA 106.50	20.2	106.0	0.50
	32 40 09	92 37 58	50.000 kW	141 M		
	Communications Capital Company BPH-20040811AAE					
KZMZ	LIC 245C	Alexandria	LA 95.57	148.1	95.0	0.57
	31 02 15	92 29 45	100.000 kW	442 M		
	Capstar TX Limited Partnership BLH-19830815AE					
RADD	ADD 248C	Mont Belvieu	TX 264.72	210.1	226.0	38.72
	29 41 52	94 24 09	100.000 kW	600 M		
	Cumulus Licensing LLC					

Graham Brock, Inc. - Broadcast Technical Consultants

70 dBu RADIUS (MAXIMUM CLASS A)

Reference Site:
Latitude: 31-46-09 N
Longitude: 093-01-38 W
ERP: 6.00 KW
Channel: 248A

092-50-00 W

NATCHITOCHEES

Clarence

Reference

Natchez

093-10-00 W

093-20-00 W

31-50-00 N

31-40-00 N

Provençal

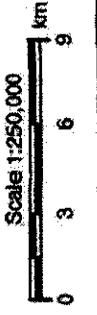
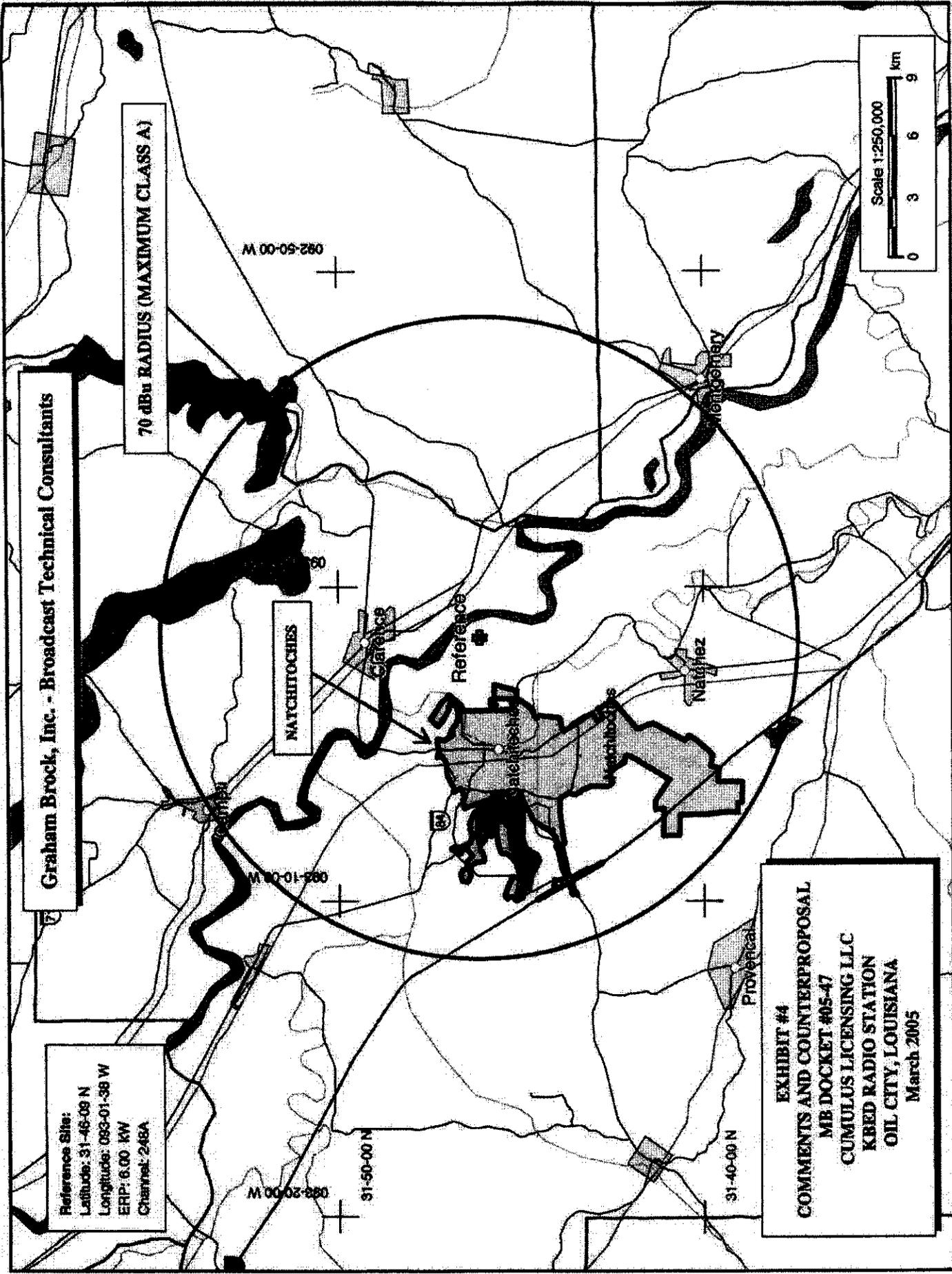


EXHIBIT #4
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KRED RADIO STATION
OIL CITY, LOUISIANA
March 2005



COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #5

Allocation study for Dubach, Louisiana
Using actual KPCH site as reference

REFERENCE
32 40 09 N
92 37 58 W

CLASS - C2
Current Spacings

DISPLAY DATES
DATA 03-30-05
SEARCH 03-31-05

----- Channel 249 - 97.7 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Ant	Power	HAAT	
AD249C	ADD 249C2	Dubach	LA 0.00	0.0	190.0	-190.00
	32 40 09	92 37 58	0.000 kW 0 M			
	>Proposed allocation - to replace Channel 249C1					
KPCH.C	CP 249C2	Dubach	LA 0.00	0.0	190.0	-190.00
	32 40 09	92 37 58	CX 50.000 kW	141 M		
	Communications Capital Company BPH-20040811AAZ					
KPCH	LIC 249C2	Dubach	LA 0.27	131.7	190.0	-189.73
	32 40 03	92 37 50	CN 50.000 kW	139 M		
	Communications Capital Company BLH-19980714KC					
AD248	ADD 248A	Natchitoches	LA 106.50	200.4	106.0	0.50
	31 46 09	93 01 38	0.000 kW 0 M			
KZRZ	LIC 252C2	West Monroe	LA 60.19	90.7	58.0	2.19
	32 39 38	91 59 28	CN 50.000 kW	150 M		
	Opus Broadcasting Monroe BLH-19930331KA					
KJMG	LIC 247A	Bastrop	LA 67.01	89.5	55.0	12.01
	32 40 20	91 55 06	CN 5.900 kW	100 M		
	Holladay Broadcasting of LA BLH-19960906KD					
KAPBFM	LIC 249A	Marksville	LA 179.17	162.9	166.0	13.17
	31 07 27	92 04 40	CN 6.000 kW	100 M		
	Three Rivers Radio Company BLH-19980109KE					
WYYJ	LIC 249A	Fayette	MS 181.39	127.1	166.0	15.39
	31 40 32	91 06 18	C 2.500 kW	157 M		
	Natchez Communications, Inc. BLH-20001013ABM					
KTJZ.C	CP -D 248A	Tallulah	LA 126.80	101.9	106.0	20.80
	32 25 42	91 18 47	DCX 6.000 kW	92 M		
	Mid South Communications BNPB-20050103AFY					
KTALFM	LIC 251C	Texarkana	TX 131.24	281.8	105.0	26.24
	32 54 11	94 00 22	EN 100.000 kW	415 M		
	Access.1 Communications BLH-4026					
AP248	APP 248A	Tallulah	LA 135.30	101.1	106.0	29.30
	32 25 38	91 13 15	0.000 kW 0 M			
	Holladay Broadcasting of LA BSFH-20040806ACZ					
AL248	VAC 248A	Tallulah	LA 137.03	101.4	106.0	31.03
	32 25 07	91 12 15	N 6.000 kW	100 M		
	RM					
KAMDFM	LIC 246C2	Camden	AR 94.04	349.9	58.0	36.04
	33 30 14	92 48 38	CX 50.000 kW	139 M		
	Radio Works, Inc. BLH-20020806AAD					

Graham Brock, Inc. - Broadcast Technical Consultants

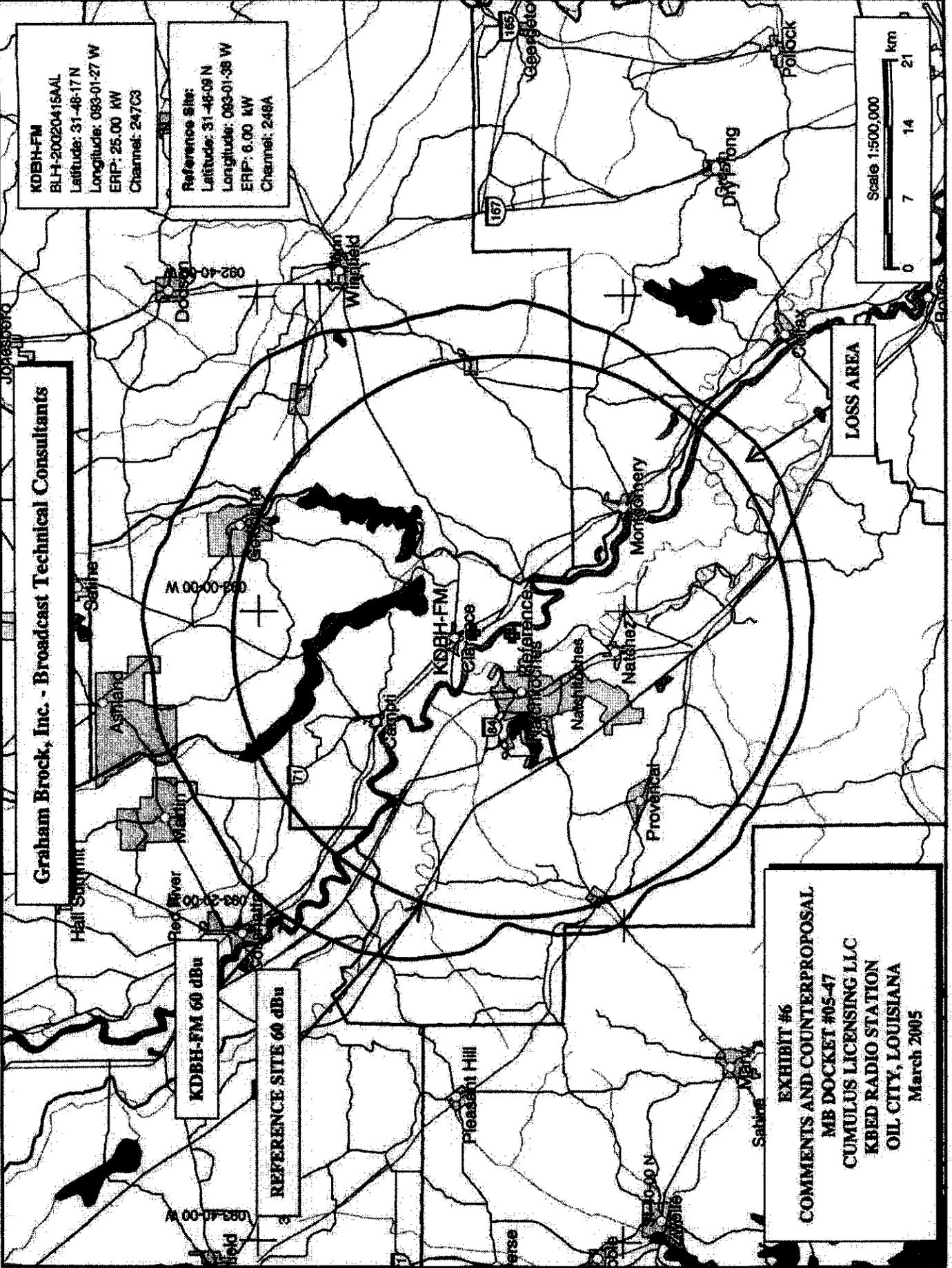
KDBH-FM
 BLH-20020415AAL
 Latitude: 31-48-17 N
 Longitude: 093-01-27 W
 ERP: 25.00 kW
 Channel: 247C3

Reference Site:
 Latitude: 31-48-09 N
 Longitude: 093-01-38 W
 ERP: 0.00 kW
 Channel: 248A



LOSS AREA

EXHIBIT #6
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005



KDBH-FM 60 dBu

REFERENCE SITE 60 dBu

JOHNSBORO

Hall Summit

Aspland

Red River

Midway

Southgate

00-42-00

00-00-00

02-40-00

02-40-00

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Graham Brock, Inc. - Broadcast Technical Consultants

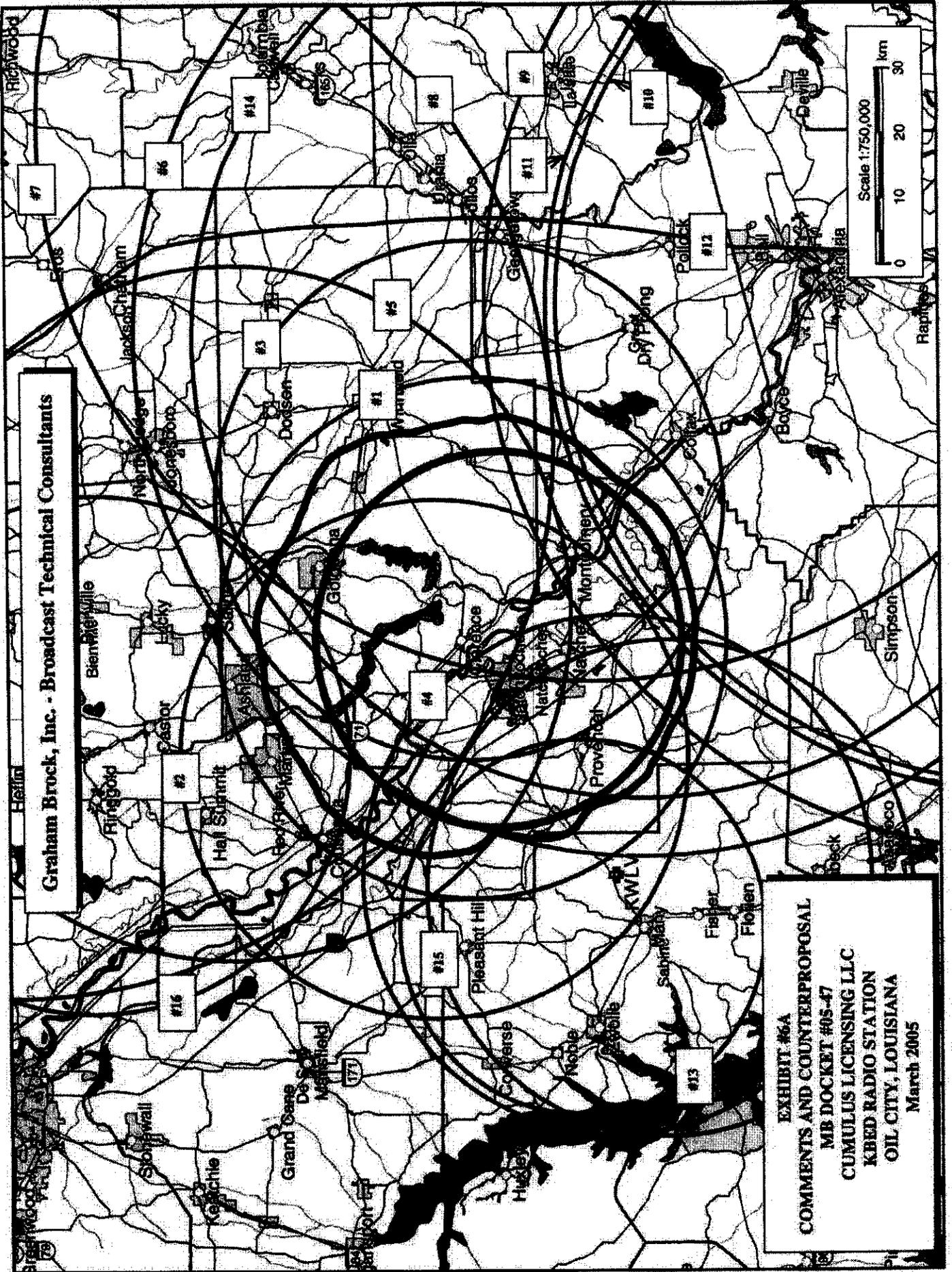


EXHIBIT #6A
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #6B

<u>No.</u>	<u>Call</u>	<u>City of License</u>	<u>Channel/Frequency</u>
1	KZBL	Natchitoches, LA	264C3
2	KSBH	Coushatta, LA	235C3
3	KCIJ	Atlanta, LA	293C3
4	KWLX	Many, LA	296C3
5	Allotment	Hodge, LA	231C2
6	KLSA	Alexandria, LA	214C
7	KQID-FM	Alexandria, LA	226C
8	KXKZ	Ruston, LA	298C
9	KXMZ	Alexandria, LA	245C
10	KKST	Oakdale, LA	254C1
11	KRRV-FM	Alexandria, LA	262C0
12	KWKH	Shreveport, LA	1130 kHz
13	KTEZ (CP)	Zwolle, LA	260A
14	KAYT	Jena, LA	201C1
15	KAVK	Many, LA	207C3
16	Allotment	Ringgold, LA	253C3

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #7

Allocation study for Longview, Texas
Using proposed allocation site as reference

REFERENCE 32 42 01 N CLASS - C2 DISPLAY DATES
94 40 47 W Current Spacings DATA 03-30-05
SEARCH 03-31-05
----- Channel 300 - 107.9 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Power	HAAT		
AD300	ADD 300C2	Longview	TX 0.00	0.0	190.0	-190.00
	32 42 01	94 40 47	0.000 kW 0 M			
	>substitute for Channel 247C2					
KVMAFM	CP -N 300C2	Oil City	LA 88.86	104.8	190.0	-101.14
	32 29 36	93 45 55 NCX	24.500 kW	163 M		
	Cumulus Licensing LLC		BPH-20030610ADI			
	> to Channel 247C2 at Waskom, Texas					
KVMAFM	LIC 300C1	Magnolia	AR 150.70	63.3	224.0	-73.30
	33 17 59	93 13 57 CN	100.000 kW	107 M		
	Cumulus Licensing LLC		BMLH-19870218KB			
	> to Channel 300C2 at Oil City, Louisiana					
RADD	ADD 300A	Tennessee Colony	TX 140.52	228.7	166.0	-25.48
	31 51 38	95 47 49	6.000 kW	100 M		
	Charles Crawford					
	> this instant proposal is mutually exclusive with this request.					
KTBO	LIC 299C2	Nacogdoches	TX 109.99	180.5	130.0	-20.01
	31 42 30	94 41 23 CY	50.000 kW	150 M		
	Capstar TX Limited Partnership		BLH-19891101KB			
	> to Channel 299C3 at Nacogdoches, Texas					
AD299	ADD 299C3	Nacogdoches	TX 118.07	178.5	117.0	1.07
	31 38 09	94 38 50	0.000 kW 0 M			
	>substitute for Channel 299C2					
980812	VAC 247C2	Longview	TX 23.67	192.2	20.0	3.67
	32 29 30	94 44 00 N	50.000 kW	150 M		
RDEL	DEL 247C2	Longview	TX 23.67	192.2	20.0	3.67
	32 29 30	94 44 00	50.000 kW	150 M		
	Charles Crawford					
KPLTFM	LIC 299C2	Paris	TX 134.95	329.8	130.0	4.95
	33 44 55	95 24 53 C	50.000 kW	150 M		
	East Texas Broadcasting, Inc.		BLH-20040317ACP			
RADD	ADD 247C2	Longview	TX 27.79	200.1	20.0	7.79
	32 27 54	94 46 54	50.000 kW	150 M		
	Charles Crawford					
KISX	LIC 297C2	Whitehouse	TX 66.81	226.9	58.0	8.81
	32 17 19	95 11 56 CN	50.000 kW	148 M		
	Capstar TX Limited Partnership		BLH-19890308KA			
KESSFM	LIC 300C1	Lewisville	TX 233.55	288.1	224.0	9.55
	33 19 42	97 03 56 CX	100.000 kW	299 M		
	KECS-FM License Corporation		BLH-20031210RAY			

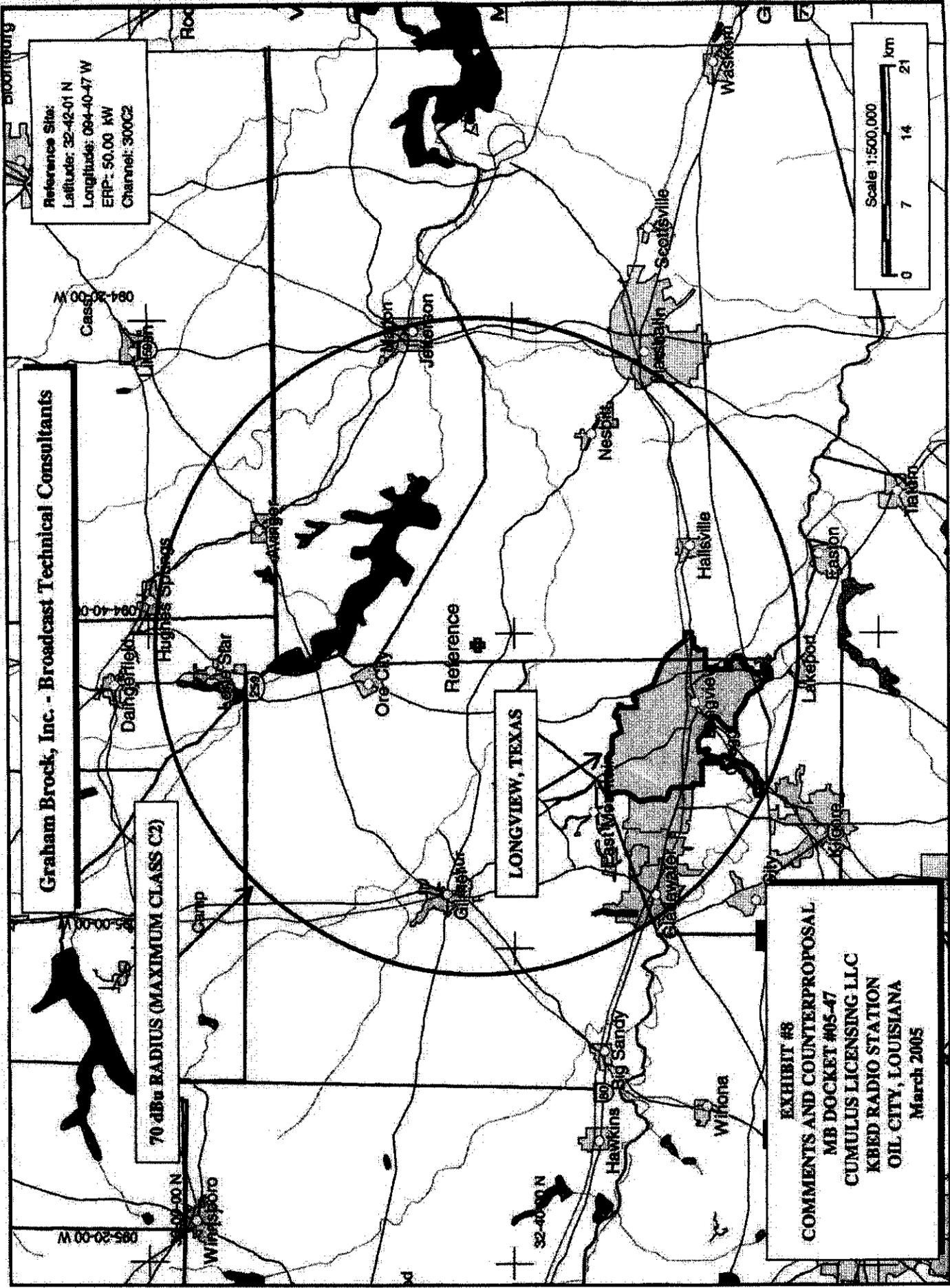
Graham Brock, Inc. - Broadcast Technical Consultants

Reference Site:
Latitude: 32-42-01 N
Longitude: 094-40-47 W
ERP: 50.00 kW
Channel: 300C2

70 dBu RADIUS (MAXIMUM CLASS C2)

LONGVIEW, TEXAS

EXHIBIT #8
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005



COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #9

Allocation study for Nacogdoches, Texas
Using proposed allocation site as reference

REFERENCE 31 38 09 N CLASS = C3 DISPLAY DATES
94 38 50 W Current Spacings DATA 03-30-05
SEARCH 03-31-05
----- Channel 299 - 107.7 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Ant	Power	HAAT	
KTBO	LIC 299C2	Nacogdoches	TX 8.99	333.5	177.0	-168.01
	31 42 30	94 41 23	CX 50.000 kW	150 M		
	Capstar TX Limited Partnership BLH-19891101KB					
AD299	ADD 299C3	Nacogdoches	TX 0.00	0.0	153.0	-153.00
	31 38 09	94 38 50	0.000 kW 0 M			
	> substitute for Channel 299C2					
KQOK	LIC-Z 300C	Beaumont	TX 176.03	176.2	176.0	0.03
	30 03 05	94 31 37	ZCN 100.000 kW	551 M		
	Liberman Broadcasting of Hou. BLH-19901213KA					
RDEL	DEL 300C	Beaumont	TX 176.03	176.2	176.0	0.03
	30 03 05	94 31 37	N 100.000 kW	600 M		
	KXTJ License, Inc.					
RADD	ADD 300C	Dayton	TX 176.03	176.2	176.0	0.03
	30 03 05	94 31 37	N 100.000 kW	600 M		
	KXTJ License, Inc.					
AD300	ADD 300C2	Longview	TX 118.07	358.5	117.0	1.07
	32 42 01	94 40 47	0.000 kW 0 M			
KQOK.A	APP-N 300C	Beaumont	TX 179.73	176.9	176.0	3.73
	30 01 01	94 32 47	NCX 90.000 kW	596 M		
	Liberman Broadcasting of Hou. BPH-20040427ABI					
KVMAFM	CP -N 300C2	Oil City	LA 126.39	40.8	117.0	9.39
	32 29 36	93 45 55	NCX 24.500 kW	163 M		
	Cumulus Licensing LLC BPH-20030610ADI					
RADD	ADD 300A	Tennessee Colony	TX 111.75	283.2	89.0	22.75
	31 51 38	95 47 49	6.000 kW	100 M		
	Charles Crawford					
RADD	ADD 299A	Groesbeck	TX 168.57	264.6	142.0	26.57
	31 28 54	96 24 49	6.000 kW	100 M		
	Charles Crawford					
KXKZ	LIC 298C	Ruston	LA 203.56	63.3	176.0	27.56
	32 26 37	92 42 43	CX 100.000 kW	325 M		
	Communications Capital Company BMLH-20040811AAD					
KISX	LIC 297C2	Whitehouse	TX 89.21	324.5	56.0	33.21
	32 17 19	95 11 56	CN 50.000 kW	148 M		
	Capstar TX Limited Partnership BLH-19890308KA					
RADD	ADD 300C2	Oil City	LA 164.11	30.8	117.0	47.11
	32 54 06	93 44 41	50.000 kW	150 M		
	Columbia Broadcasting Co.					

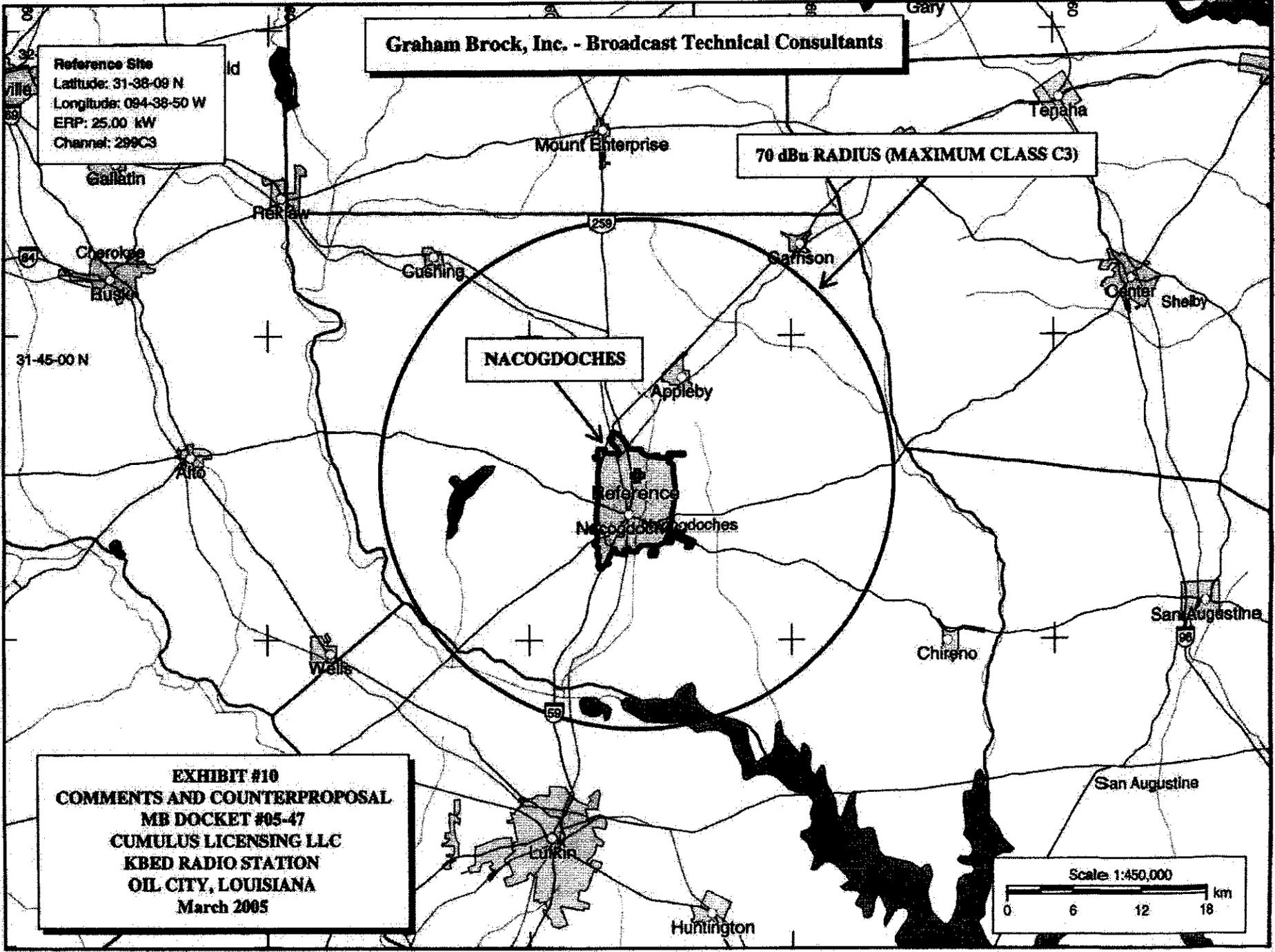
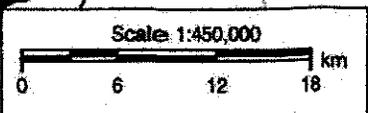
Graham Brock, Inc. - Broadcast Technical Consultants

Reference Site
Latitude: 31-38-09 N
Longitude: 094-38-50 W
ERP: 25.00 kW
Channel: 299C3

70 dBu RADIUS (MAXIMUM CLASS C3)

NACOGDOCHES

**EXHIBIT #10
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005**



KTBQ
Latitude: 31-42-30 N
Longitude: 094-41-23 W
ERP: 50.00 kW
Channel: 299C2

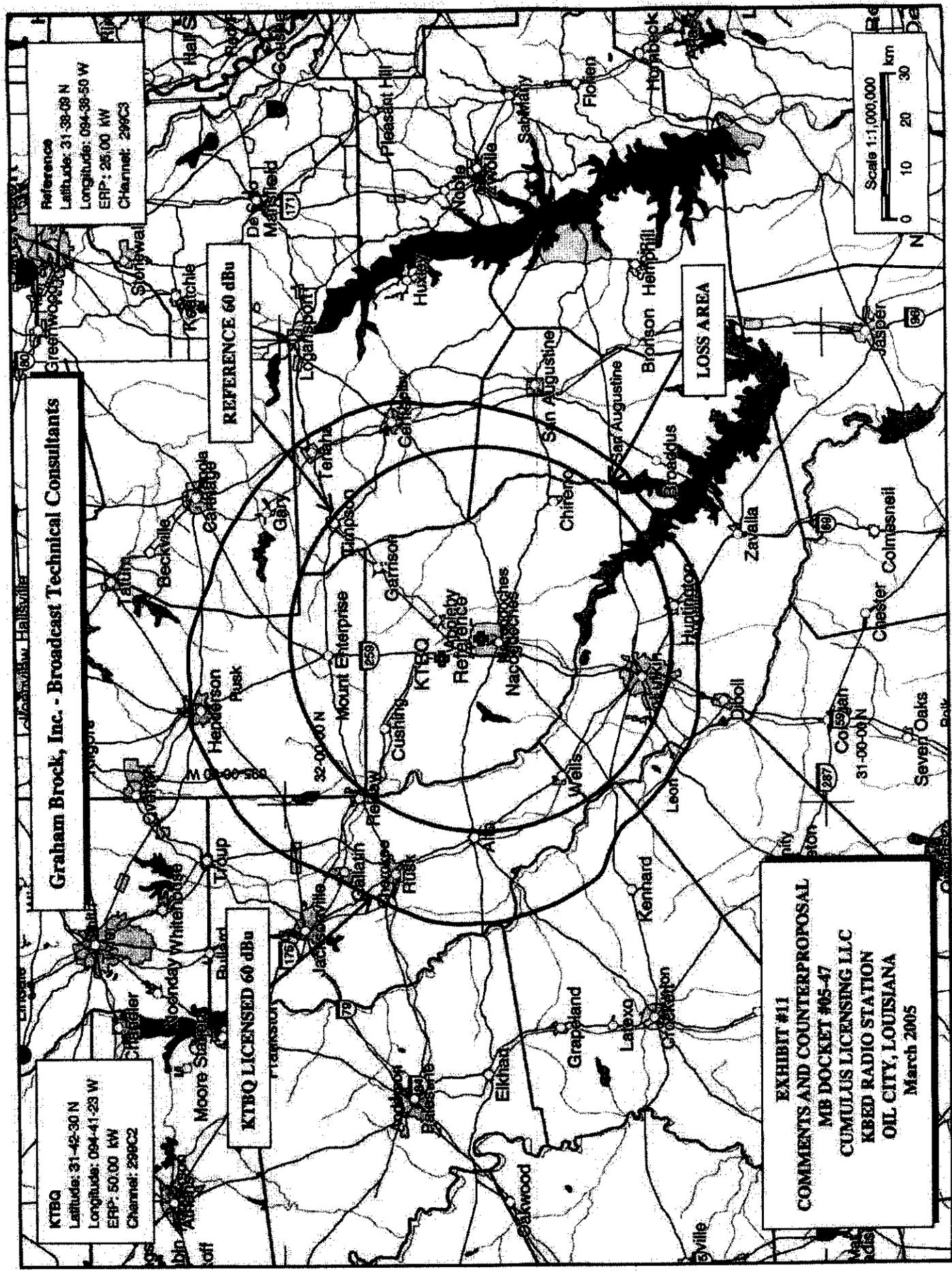
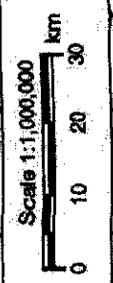
Graham Brock, Inc. - Broadcast Technical Consultants

Reference
Latitude: 31-39-08 N
Longitude: 094-38-50 W
ERP: 25.00 kW
Channel: 299C3

KTBQ LICENSED 60 dBu

REFERENCE 60 dBu

EXHIBIT #11
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005



Graham Brock, Inc. - Broadcast Technical Consultants

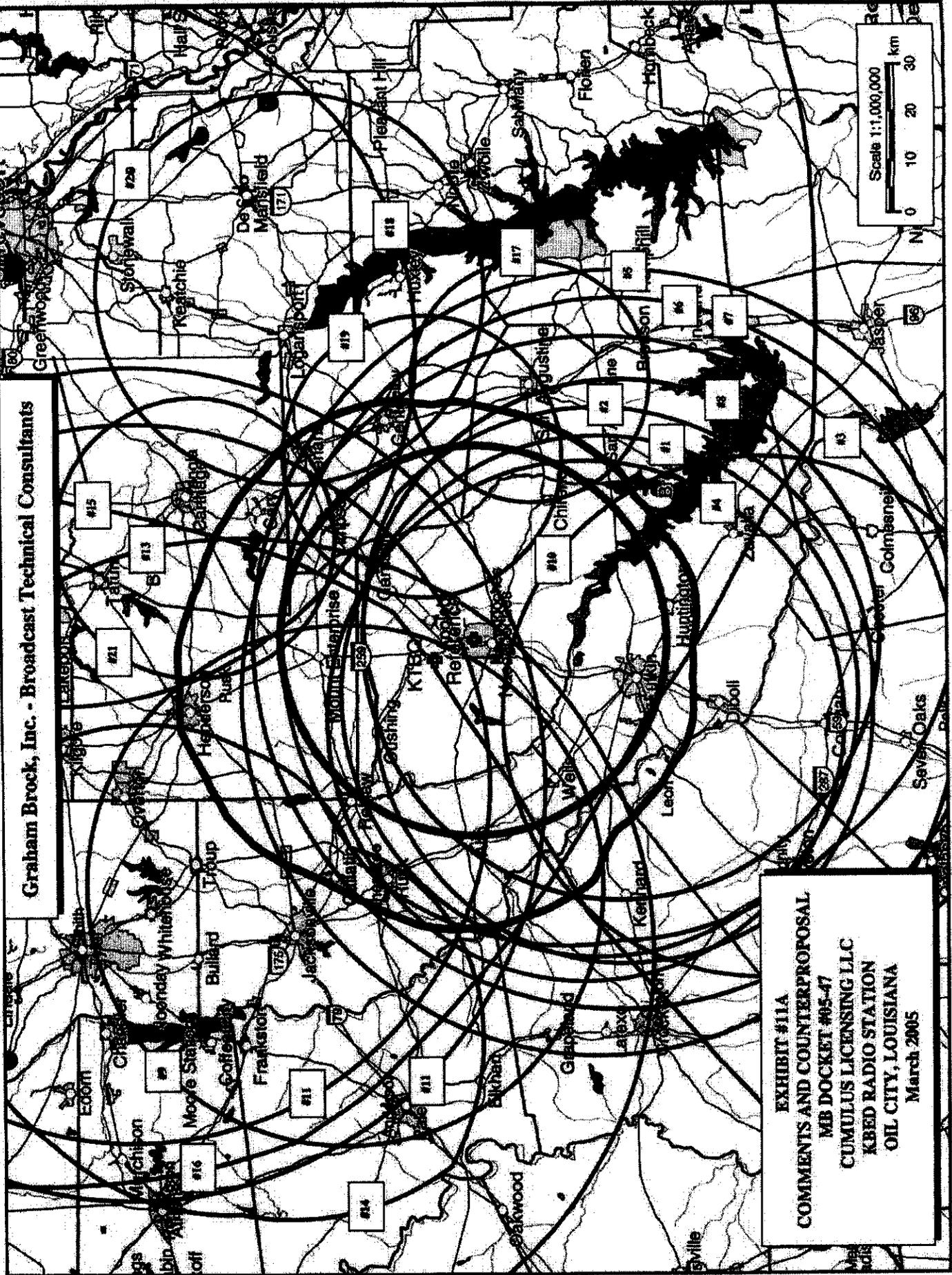


EXHIBIT #11A
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #11B

<u>No.</u>	<u>Call</u>	<u>City of License</u>	<u>Channel/Frequency</u>
1	KYBI	Lufkin , TX	261C2
2	KLDN	Lufkin TX	205C1
3	KAFX-FM	Diboll, TX	238C1
4	KJCS	Nacogdoches, TX	277C2
5	KYKS	Lufkin, TX	286C
6	KSML-FM	Huntington, TX	270C2
7	KSWP	Lufkin, TX	2215C1
8	KAVX	Lufkin, TX	2220C2
9	KLJT	Jacksonville, TX	272C2
10	KVLL-FM	Wells, TX	234C2
11	KTYL-FM	Tyler, TX	226C1
12	KNUE	Tyler, TX	268C
13	KOOI (CP)	Jacksonville, TX	293C
14	KBJS (CP)	Jacksonville, TX	212C1
15	WBAP	Fort Worth, TX	820 kHz
16	KWKH	Shreveport, LA	1130 kHz
17	KQSI	San Augustine, TX	223A
18	KTUX	Carthage, TX	255C1
19	KQBB	Center, TX	263A
20	KORI	Mansfield, LA	284C3
21	KGAS-FM	Carthage, TX	282A

COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #12

Allocation study for Oil City, Louisiana
Using proposed allocation site as reference

REFERENCE		CLASS - C	DISPLAY DATES
32 40 08 N		Current Spacings	DATA 03-30-05
93 52 45 W			SEARCH 03-31-05

----- Channel 266 - 101.1 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
	N. Lat.	W. Lng.	Ant	Power	HAAT	
AD266	ADD 266C	Oil City	LA 0.00	0.0	290.0	-290.00
	32 40 08	93 52 45	0.000 kW 0 M			
			> Change of community from Shreveport, Louisiana.			
KRMDFM	CP -N 266C	Shreveport	LA 5.40	290.1	290.0	-284.60
	32 41 08	93 56 00 NCK	100.000 kW	496 M		
		Cumulus Licensing LLC	BMPH20030507ACJ			
KRMDFM	LIC 266C	Shreveport	LA 5.40	290.1	290.0	-284.60
	32 41 08	93 56 00 CY	100.000 kW	341 M		
		Cumulus Licensing LLC	BLH19850228LB			
KRMDFM	APP-N 266C	Shreveport	LA 5.40	290.1	290.0	-284.60
	32 41 08	93 56 00 NCK	100.000 kW	475 M		
		Cumulus Licensing LLC	BPH20040902ACF			
KDELFM	CP 265C3	Arkadelphia	AR 176.01	30.4	176.0	0.01
	34 01 58	92 54 44 CX	25.000 kW	100 M		
		Clark County Broadcasting	BPH20040127AMK			
WRR .C	CP 266C	Dallas	TX 290.01	269.1	290.0	0.01
	32 35 19	96 58 05 CY	100.000 kW	508 M		
		City Of Dallas, Texas	BPH20030925ATO			
WRR	LIC 266C	Dallas	TX 290.13	269.1	290.0	0.13
	32 35 22	96 58 10 CY	100.000 kW	460 M		
		City Of Dallas, Texas	BLH19860130KF			
KZHE	LIC 263C2	Stamps	AR 105.91	32.0	105.0	0.91
	33 28 34	93 16 23 CN	50.000 kW	150 M		
		A-1 Communications, Inc.	BLH19920410KC			
RADD	ADD 267A	Colfax	LA 166.32	143.3	165.0	1.32
	31 27 53	92 49 44	6.000 kW	100 M		
		Charles Crawford				
KNUE	LIC 268C	Tyler	TX 110.47	245.9	105.0	5.47
	32 15 35	94 57 02 CY	100.000 kW	327 M		
		Capstar TX Limited Partner	BLH19850307KT			
RADD	ADD 268C0	Tyler	TX 110.47	245.9	105.0	5.47
	32 15 35	94 57 02	100.000 kW	450 M		
		Charles Crawford				
RDEL	DEL 268C	Tyler	TX 110.47	245.9	105.0	5.47
	32 15 35	94 57 02	100.000 kW	600 M		
		Charles Crawford				

Graham Brock, Inc. - Broadcast Technical Consultants

Reference Site
Latitude: 32-40-08 N
Longitude: 093-52-45 W
ERP: 100.00 kW
Channel: 286C

70 dBu RADIUS (MINIMUM CLASS C)

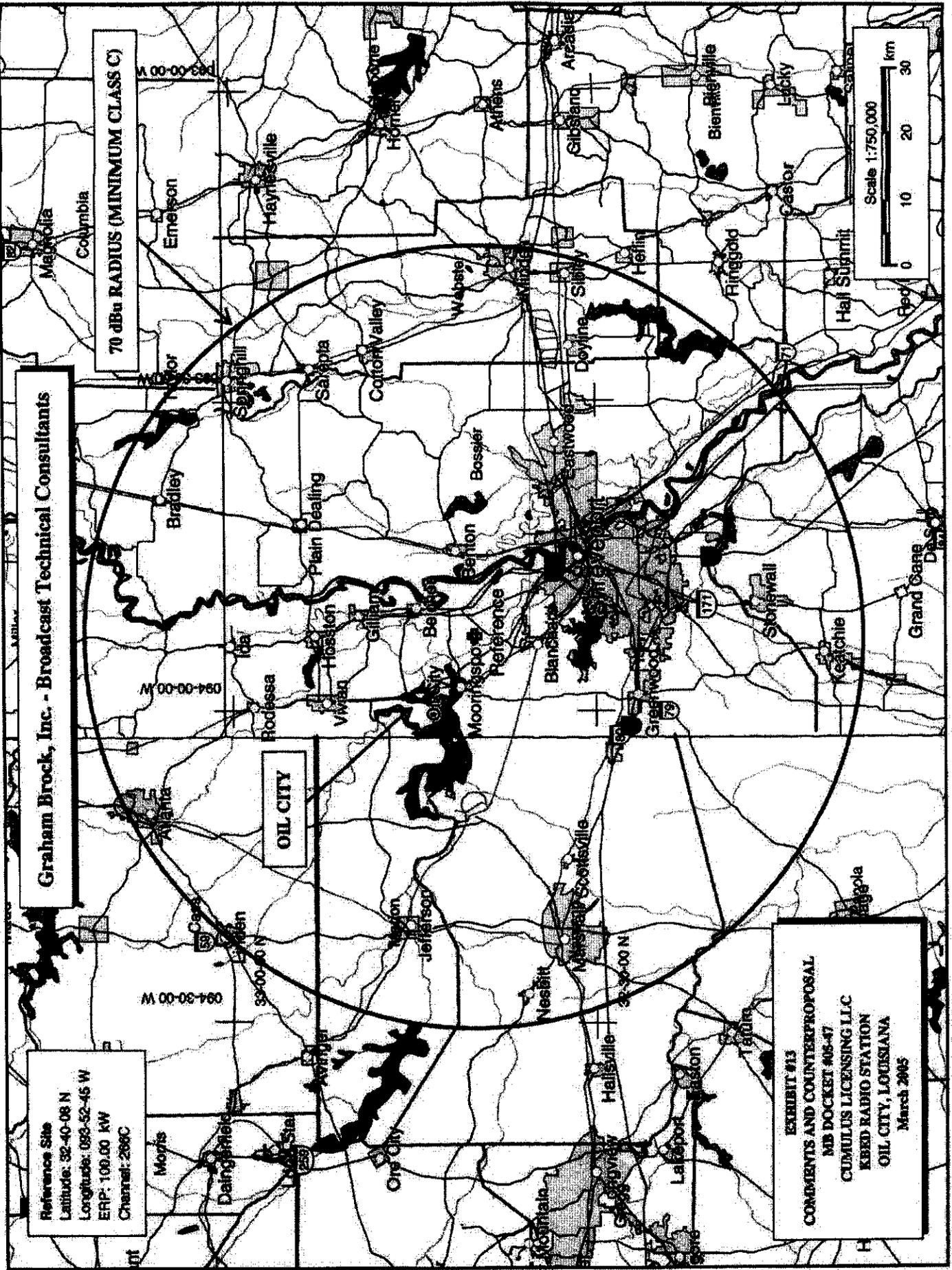


EXHIBIT #13
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

KRMF-FM
BLH-19950228LB
Latitude: 32-41-08 N
Longitude: 093-56-00 W
ERP: 100.00 kW
Channel: 266C

Graham Brock, Inc. - Broadcast Technical Consultants

Reference
Latitude: 32-40-08 N
Longitude: 093-52-45 W
ERP: 100.00 kW
Channel: 266C

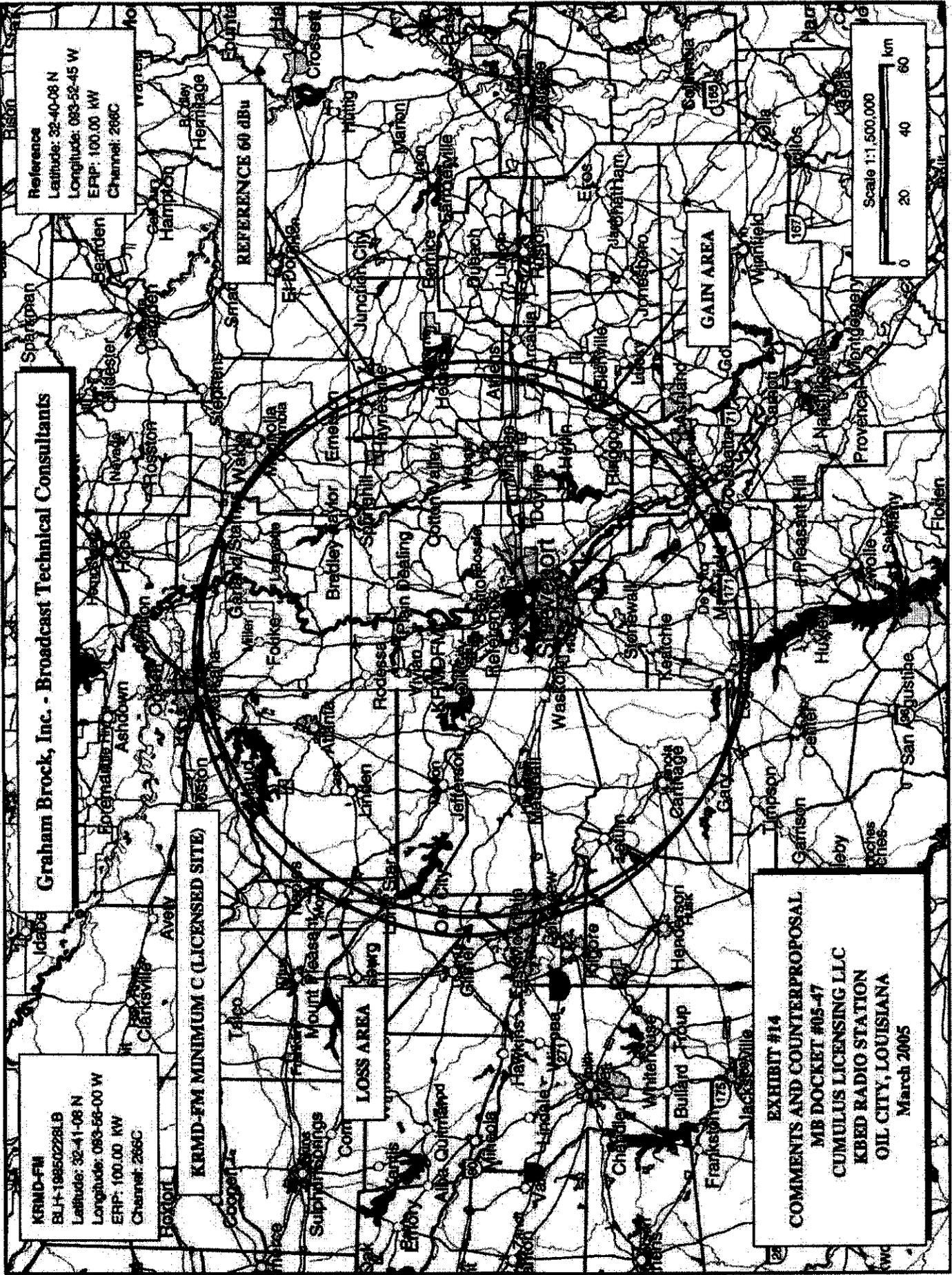
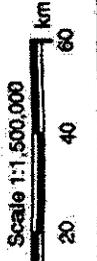
KRMF-FM MINIMUM C (LICENSED SITE)

LOSS AREA

REFERENCE 60 dBu

GAIN AREA

EXHIBIT #14
COMMENTS AND COUNTERPROPOSAL
MR DOCKET #05-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

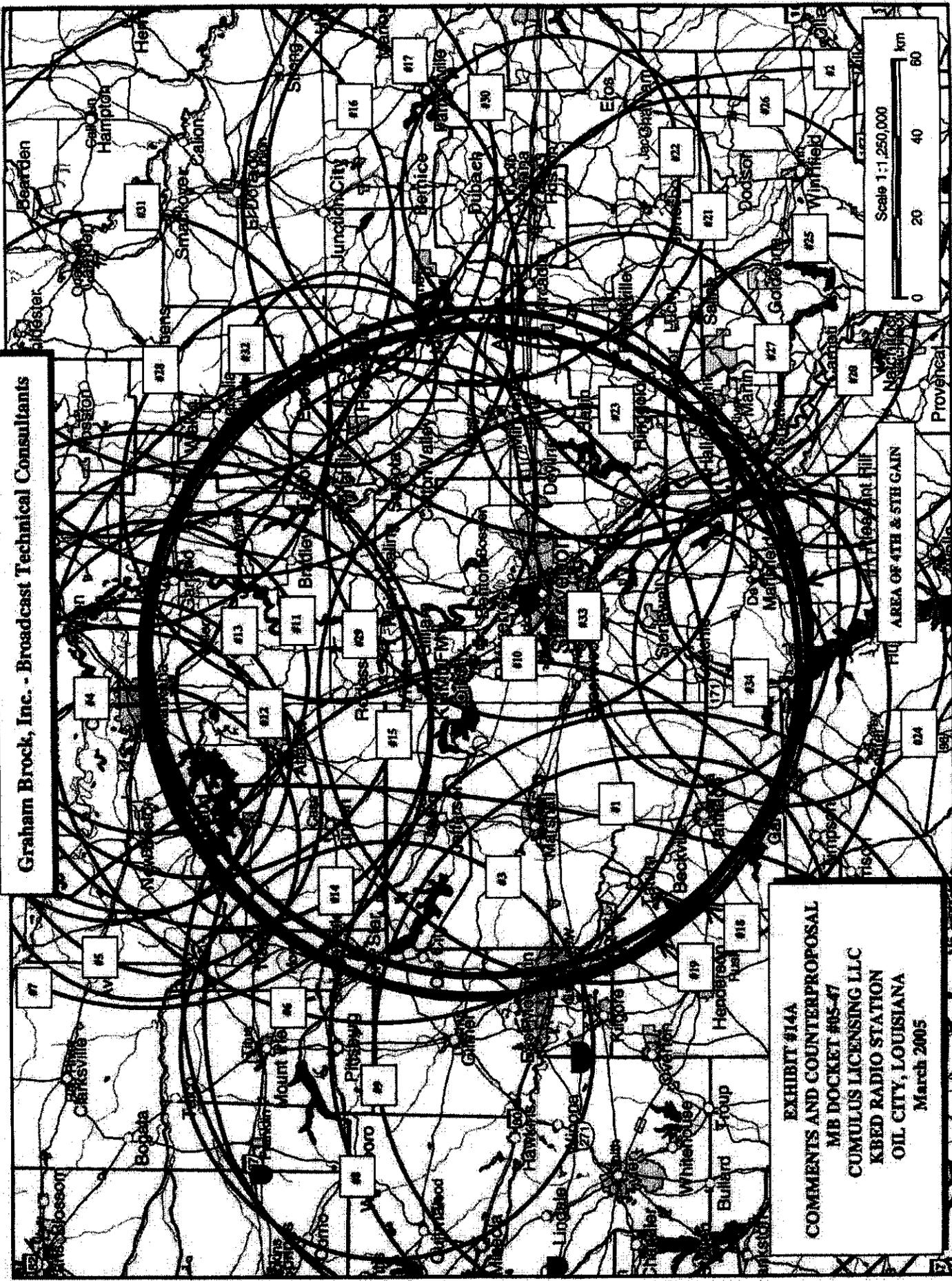


Graham Brock, Inc. - Broadcast Technical Consultants

EXHIBIT #14A
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #85-47
CUMULUS LICENSING LLC
KBED RADIO STATION
OIL CITY, LOUISIANA
March 2005

AREA OF 4TH & 5TH GAIN

Scale 1:1,250,000



COMMENTS AND COUNTERPROPOSAL

MB DOCKET #05-47

CUMULUS LICENSING LLC

KBED RADIO STATION

OIL CITY, LOUISIANA

March 2005

EXHIBIT #14B

<u>No.</u>	<u>Call</u>	<u>City of License</u>	<u>Channel/Frequency</u>
1	WBAP	Fort Worth, TX	820 kHz
2	KWKH	Shreveport, LA	1130 kHz
3	KDVE	Pittsburg, TX	276C2
4	KEWL-FM	New Boston, TX	236C3
5	KTXK	Texarkana, TX	218C1
6	KTAL-FM	Texarkana, TX	251C
7	KKYR-FM	Texarkana, TX	273C1
8	KNUE	Tyler, TX	268C
9	KTYL-FM	Tyler, TX	226C1
10	KYKX	Longview, TX	289C
11	KHTA	Wake Village, TX	223C3
12	KMJI	Ashdown, AR	227C3
13	KPWW	Hooks, TX	240C3
14	KNRB	Atlanta, TX	261C2
15	KYGL	Texarkana, AR	292C2
16	KCXY	East Camden, AR	237C1
17	KIXB	El Dorado, AR	277C1
18	KRUF (CP)	Shreveport, LA	233C
19	KXKS-FM	Shreveport, LA	229C
20	KXKZ	Ruston, LA	298C
21	KNBB	Ruston, LA	257C3
22	KPCH (CP)	Dubach, LA	249C2

<u>No.</u>	<u>Call</u>	<u>City of License</u>	<u>Channel/Frequency</u>
23	KTUX	Carthage, TX	255C1
24	KORI	Mansfield, LA	284C3
25	KSBH	Coushatta, LA	235C3
26	Allotment	Hodge, LA	231C2
27	Allotment	Ringgold, LA	253C3
28	KTKC	Springhill, LA	225C2
29	KLKL	Minden, LA	239C2
30	KMRX	El Dorado, AR	241C1
31	KZHE	Stamps, AR	263C2
32	Allotment	Haynesville, LA	288A
33	New FM	Mansfield, LA	219C3
34	KJVC	Mansfield, LA	224A

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

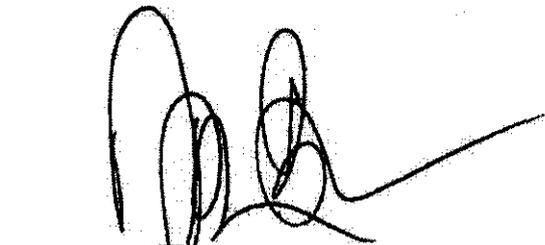
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 31st day of March, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 31st day of March, 2005*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007

ATTACHMENT 1

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554
January 12, 2005

Cumulus Licensing LLC
c/o Mark Lipp
Vinson & Elkins, LLP
1455 Pennsylvania Ave., NW
Washington, DC 20004-1008

In re: KVMA-FM, Oil City, LA
Cumulus Licensing LLC
BLH-20040830ACO
Program Test Authority.

Dear Mr. Lipp:

This letter is in reference to: (1) the above-captioned license application filed on August 30, 2004; and (2) the complaint filed by the Federal Aviation Administration on December 28, 2004. For the reasons stated below, we suspend program test authority and order KVMA-FM to cease operations immediately.

Background

On August 30, 2004 KVMA filed license application BLH-20040830ACO, indicating that it had commenced automatic program tests.¹ On December 28, 2004, the FAA sent the Commission a request to shut down KVMA-FM, because of interference being caused to radio navigational aids located at Barksdale Air Force Base. The request indicated that KVMA could be heard on the Instrument Landing System (ILS) frequency supporting Runway 15 at Barksdale. In addition, the FAA indicated that KVMA is causing the radio-navigational aid to become unreliable and unusable. As a result, Barksdale Air Force Base has taken the localizer out of service. As of January 11, 2005 KVMA had reduced power by 88% to 3 kW. However, the Air Force indicates that even with the power reduced, the interference persists.

Commission Action

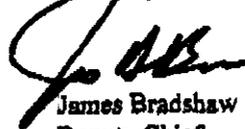
47 CFR § 73.1620(b) specifically states:

The FCC reserves the right to revoke or suspend program tests by any station without right of hearing for failure to comply adequately with all terms of the construction permit or in order to resolve instances of objectionable interference.

¹ KVMA commenced operation with an ERP of 24.5 kw and a HAAT of 165 meters.

Accordingly, in light of the threat to human safety and pursuant to 47 CFR § 73.1620(b), **PROGRAM TEST AUTHORITY IS HEREBY SUSPENDED**. In addition, any equipment tests from the current site must be authorized by the New Orleans Field Office, Ph. 504-219-8989, and in cooperation with the Barksdale Air Force Base. Any request for reinstatement of program test authority must include a report indicating the measures taken to resolve the interference. In any event, a progress report must be submitted to James Bradshaw, Audio Division, Federal Communication Commission, 445 12th St., SW, Washington, D. C., 20554 no later than February 15, 2005. These actions are taken pursuant to 47 CFR § 0.283.

Sincerely,



James Bradshaw
Deputy Chief
Audio Division
Media Bureau

cc: Cumulus Licensing, LLC
George Dillon, EB, FCC
Graham K. Bloxom, USAF
George Sakai, FAA

ATTACHMENT 2