

ORIGINAL

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

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
)  
Amendment of Section 73.202(b), ) RM-  
FM Table of Allotments )  
)  
(Waldport, Dallas and Monmouth, OR) )

To: The Chief, Audio Division, Media Bureau

**PETITION FOR RULE MAKING**

Pursuant to Sections 1.401 and 1.420 of the Commission's Rules, Radio Beam, LLC ("Radio Beam"), hereby petitions the Commission to institute a proceeding looking toward amendment of Section 73.202(b), the FM Table of Allotments, as follows<sup>1</sup>:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Waldport, OR	--	253A
Dallas, OR	252C3	236C3
Monmouth, OR	236C3	252C3

As shown in the attached Engineering Statement, Channel 253A can be allotted to Waldport in compliance with all applicable requirements, provided that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas, OR.<sup>2</sup> The allotment of Channel 236C3 to

<sup>1</sup> This petition is a resubmission of a petition filed December 10, 2003, which was returned by letter of the Assistant Chief, Audio Division, dated May 2, 2005, due to an apparent short-spacing. That problem has been corrected.

<sup>2</sup> It should be noted that by Report and Order in MB Docket No. 04-124, released May 27, 2005, the Assistant Chief, Audio Division, denied petitions for rule making proposing reservation of Channel 252C3 at Dallas for noncommercial educational use.

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Dallas, in turn, requires that Channel 252C3 be substituted for Channel 236C3 at Monmouth, OR.

In order to prevent a short-spacing to KNRQ(FM), which operates on Channel 250C at Eugene, OR, an allotment site for Channel 253A at Waldport has been identified at NL 44-30-06, WL 124-04-30. As shown in the Engineering Statement, principal-city coverage to all of Waldport can be achieved from that site.

To accommodate Channel 236C3 at Dallas, an allotment site has been identified at NL 44-50-43, WL 123-30-07. As shown in the Engineering Statement, principal-city coverage to all of Dallas can be achieved from that site.

To accommodate Channel 252C3 at Monmouth, an allotment site has been identified at NL 44-53-08, WL 123-05-36. As shown in the Engineering Statement, principal-city coverage to all of Monmouth can be achieved from that site. Radio Beam, the licensee of KSND(FM), which is currently authorized on Channel 236C3 at Monmouth, hereby agrees to the channel change at Monmouth and the concomitant change in reference coordinates. Radio Beam further agrees to file an application for a construction permit to modify its facilities to specify Channel 252C3 at a site that will comply with all applicable requirements.

The proposed amendments to Section 73.202 will serve the public interest. Waldport, an incorporated community with a 2000 U.S. Census population of 2050 persons, will be provided with a second local aural service and a first FM service.<sup>3</sup> Moreover, as shown in the Engineering

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<sup>3</sup> The Commission has already determined that Waldport meets the requirements for a "community," since AM station KORC is licensed to Waldport.

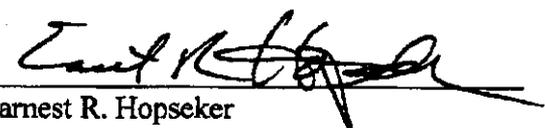
Statement, the proposals in the aggregate will provide new service to 254,812 persons, and the entire "loss area" will continue to receive at least five aural services.

For the reasons stated, it is respectfully requested that the Commission issue a Notice of Proposed Rule Making proposing the amendments to Section 73.202(b) described above. Radio Beam represents that if Channel 253A is allotted to Waldport, Oregon, Radio Beam will file an application for a construction permit for that channel, and, if its application is granted, will timely construct a facility on such channel.

I hereby declare under penalty of perjury that the statements contained herein are true and correct to the best of my knowledge.

Respectfully submitted,

RADIO BEAM, LLC

By: 

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Dated: June 1, 2005

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## **ENGINEERING STATEMENT**

**PETITION FOR RULEMAKING TO  
AMEND SECTION 73.202 OF THE RULES  
AND REGULATIONS FOR THE FEDERAL  
COMMUNICATIONS COMMISSION**

**TO ASSIGN FM CHANNEL 253A  
FOR USE AT WALDPORT, OREGON**

**TO ASSIGN FM CHANNEL 236C3  
FOR USE AT DALLAS, OREGON**

**TO ASSIGN FM CHANNEL 252C3  
FOR USE AT MONMOUTH, OREGON**

**RADIO BEAM, LLC**

**5/2005**

## **Engineering Statement**

This Engineering Statement has been prepared on behalf of Radio Beam, LLC ("Radio Beam"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Assign Channel 253A for use at Waldport, Oregon;
- 2) Substitute Channel 236C3 for vacant Channel 252C3 at Dallas, Oregon, and;
- 3) Substitute Channel 252C3 for Channel 236C3 at Monmouth, Oregon, for use by FM station KSND.

The proposed reallocation plan will provide several benefits:

- 1) Waldport, an incorporated city with a 2000 Census population of 2,050 persons, will receive its second local service and its first local FM service.
- 2) A total of 254,812 persons will receive an additional aural service.
- 3) In accommodating the benefits listed above, no white, gray, or underserved areas will be created.

### **Channel 253A at Waldport**

As outlined in the attached channel study, Channel 253A can be assigned for use at Waldport in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for the vacant

Hatfield & Dawson Consulting Engineers

Channel 252C3 allotment at Dallas. In order to prevent a short-spacing to KNRQ Channel 250C Eugene, an allotment site has been identified at NL 44° 30' 06" x WL 124° 04' 30". This site is 12.4 kilometers from the most distant point of the City of Waldport. The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Waldport.

The allotment of Channel 253A at Waldport will provide 60 dBu service to 26,636 persons in a 1,286 km<sup>2</sup> land area. (A portion of the 60 dBu service area falls over the Pacific Ocean.)

#### **Channel 236C3 at Dallas**

As outlined in the attached channel study, Channel 236C3 can be assigned for use at Dallas in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 252C3 is substituted for Channel 236C3 at Monmouth for use by KSND. Channel 236C3 does not fit at the existing Dallas Channel 236C3 allotment site, but an allotment site has been identified at NL 44° 50' 43" x WL 123° 30' 07". This site is 20.0 kilometers from the most distant point of the City of Dallas. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Dallas.

#### **Channel 252C3 at Monmouth**

As outlined in the attached channel study, Channel 252C3 can be assigned for use at Monmouth by KSND in compliance with the Commission's applicable Rules and Regulations

regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas. Channel 252C3 does not fit at the existing KSND Channel 252C3 allotment site, but an allotment site has been identified at NL 44° 53' 08" x WL 123° 05' 36". This site is 13.0 kilometers from the most distant point of the City of Monmouth. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Monmouth.

### **Gain and Loss Areas**

There is overlap among the 60 dBu service areas of all the existing and proposed allotments, and portions of those service areas fall at sea. The attached map titled "Gain and Loss Areas" depicts the 60 dBu service areas, and is annotated to indicate the number of services lost and gained in each area as a result of the proposed reallocation plan. The gain and loss areas are summarized in the table below:

**Table of Gain and Loss Areas**

	<b>Population and Area</b>
Loss Area	19,488 persons in 1,813 km <sup>2</sup> land area
Gain Area	254,812 persons in 3,313 km <sup>2</sup> land area

The proposed reallocation plan will not result in the creation of any white, gray, or underserved areas.<sup>1</sup> The attached "Loss Area Study" exhibit depicts the 60 dBu service contours of a subset of the numerous stations which provide service to the loss area. The contours shown are sufficient to demonstrate that the entire loss area will continue to be well-served, with five or more aural services remaining. The stations whose contours are shown are:

KGON-FM	222C	Portland
KXJM-FM	238C	Portland
KCRF-FM	244C1	Lincoln City
KKSN-FM	246C	Portland
KSHL-FM	248C2	Gleneden Beach
KRKT-FM	260C0	Albany
KKRZ-FM	262C	Portland
KPPT-FM	264C2	Depoe Bay
KUFO-FM	266C	Portland
KINK-FM	270C	Portland
KYTE-FM	274C1	Newport
KKCW-FM	277C	Portland
KLOO-FM	292C	Corvallis
KLTH-FM	294C	Portland
KHPE-FM	300C	Albany

Additional service to the loss area is provided by numerous non-commercial and commercial AM and FM stations. A list of those stations can be provided should the Commission so require.

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<sup>1</sup>In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

## SEARCH PARAMETERS

FM Database Date: 050517

Channel: 253A 98.5 MHz  
 Latitude: 44 30 6  
 Longitude: 124 4 30  
 Safety Zone: 32 km  
 Job Title: WALDFORT 253A

Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
DEL	EUGENE OR	RM-ajr322	250C 97.9	0.000 0.0	44-00-08 123-06-50	125.6	94.72 -0.28	95 SHORT
KNRQ-FM LIC	EUGENE OR	BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50	125.6	94.72 -0.28	95 SHORT
VAC	DALLAS OR	-	252C3 98.3	0.000 0.0	44-55-06 123-19-00	52.0	75.86 -13.14	89 SHORT
NOTE: TO CHANGE TO 236C3 PER THIS PROPOSAL								
NEW-T APP	DEPOE BAY OR	BNPFT-030317HWJ	252D 98.3	0.028 350.0	44-45-24 124-02-50	4.4	28.42 0.00	0 TRANS
NEW-T APP	DEPOE BAY OR	BNPFT-030827APV	252D 98.3	0.028 329.0	44-45-24 124-02-53	4.3	28.42 0.00	0 TRANS
K252DL LIC	WALTON OR	BLFT-020619AAS	252D 98.3	0.008 580.0	44-04-00 123-37-42	143.5	60.06 0.00	0 TRANS
ADD	BEND OR	RM-10684	253C1 98.5	0.000 0.0	44-04-41 121-19-57	101.2	223.90 23.90	200 CLEAR
K253AU CP	YACHATS OR	BNPFT-030826ALB	253D 98.5	0.250 95.0	44-26-34 124-04-12	176.5	6.56 0.00	0 TRANS
KYTT-FM LIC	COOS BAY OR	BLH-950309KD	254C2 98.7	13.000 293.0	43-27-49 124-05-44	180.8	115.35 9.35	106 CLOSE

## SEARCH PARAMETERS

FM Database Date: 050517

Channel: 253A 98.5 MHz  
 Latitude: 44 30 6  
 Longitude: 124 4 30  
 Safety Zone: 32 km  
 Job Title: WALDFPORT 253A

Page 2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KWPB-LP CP	NEWPORT OR	BPL-040205ADR	254L1 98.7	0.100 18.0	44-38-57 124-03-08	6.3	16.49 0.00	0 LPFM
KWPB-LP LIC	NEWPORT OR	BLL-030428AAK	254L1 98.7	0.051 41.9	44-38-45 124-03-14	5.9	16.11 0.00	0 LPFM
KUPL-FM LIC	PORTLAND OR	BLH-970915KD	254C1 98.7	37.000 440.0	45-30-58 122-43-59	42.6	154.60 21.60	133 CLEAR
KUPLaux LIC	PORTLAND OR	BXLH-031107AAG	254C1 98.7	11.000 362.0	45-30-57 122-43-52	42.7	154.69 0.00	0 AUX
KUPLaux LIC	PORTLAND OR	BXMLH-000316ABX	254C1 98.7	16.000 337.0	45-27-13 122-32-45	48.1	160.44 0.00	0 AUX
KODZ LIC	EUGENE OR	BLH-840409BY	256C 99.1	100.000 497.0	44-06-56 122-59-56	116.3	95.99 0.99	95 CLOSE
44444 BEGINNING SEARCH OF SECONDARY DATABASE					44444			
ADD	MONMOUTH OR		252C3 98.3	0.000 0.0	44-53-08 123-05-36	60.8	88.74 -0.26	89 SHORT
ADD	WALDFPORT OR		253A 98.5	0.000 0.0	44-30-06 124-04-30	34.3	0.00 -115.00	115 SHORT
44444 END OF FM SPACING STUDY FOR CHANNEL 253					44444			

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SEARCH PARAMETERS                               FM Database Date: 050517
Channel: 236C3 95.1 MHz                        Page 1
Latitude: 44 50 43
Longitude: 123 30 7
Safety Zone: 32 km
Job Title: DALLAS 236C3
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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KMGE LIC	EUGENE OR	BLH-970925KE	233C1 94.5	49.000 396.0	44-00-04 123-06-45	161.6	98.80 22.80	76 CLEAR
NEW-T APP	SALEM OR	BNPFT-030317MBL	233D 94.5	0.250 58.0	44-58-57 123-00-17	68.5	42.12 0.00	0 TRANS
KPIE-LP LIC	DALLAS OR	BLL-020923AAJ	234L1 94.7	0.100 19.2	44-52-54 123-24-06	62.9	8.90 0.00	0 LPFM
K235BF CP	BETHEL OR	BNPFT-030815AAA	235D 94.9	0.023 315.0	44-00-08 123-06-50	161.7	98.65 0.00	0 TRANS
KCBZ CP MOD	CANNON BEACH OR	BMPH-041206AAG	235C3 94.9	7.000 92.0	45-57-08 123-56-14	344.7 SS	127.66 28.66	99 CLEAR
KRAD-LP LIC	MILLERSBURG OR	BLL-040105AGV	235L1 94.9	0.014 78.8	44-39-03 123-00-59	119.2	44.11 0.00	0 LPFM
NEW-T APP	ALOHA OR	BNPFT-030310AZW	236D 95.1	0.019 355.0	45-29-20 122-41-40	41.2	95.64 0.00	0 TRANS
NEW-T APP	BETHANY OR	BNPFT-030310BHI	236D 95.1	0.016 0.0	45-31-23 122-45-07	37.7	95.65 0.00	0 TRANS
KSND-FM1 CP	DEPOE BAY OR	BNPFTB-030724ABL	236D 95.1	0.300 0.0	44-45-24 124-02-53	257.3	44.32 0.00	0 BOOST
NEW-T APP	INDEPENDENCE OR	BNPFT-030310ASJ	236D 95.1	0.023 342.0	44-58-59 123-08-39	61.3	32.13 0.00	0 TRANS
KSND LIC	MONMOUTH OR	BLH-031223ABF	236C3 95.1	1.000 477.0	44-53-19 123-36-26	300.2	9.61 -143.39	153 SHORT

NOTE: TO CHANGE TO 252C3 PER THIS PROPOSAL

## SEARCH PARAMETERS

FM Database Date: 050517

Channel: 236C3 95.1 MHz  
 Latitude: 44 50 43  
 Longitude: 123 30 7  
 Safety Zone: 32 km  
 Job Title: DALLAS 236C3

Page 2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KLTW-FM LIC	PRINEVILLE OR	BLH-850916KA	236C1 95.1	100.000 144.0	44-18-32 120-55-47	105.4	212.82 1.82	211 CLOSE
KUJZ LIC	CRESWELL OR	BLH-920331KC	237C3 95.3	0.630 368.0	44-00-04 123-06-45	161.6 SS	98.80 -0.20	99 SHORT
K269DH CP MOD	FLORENCE, ETC. OR	BMPFT-041202ABO	237D 95.3	0.025 DA 242.0	43-57-26 124-04-26	204.9	108.69 0.00	0 TRANS
K269DH APP	FLORENCE, ETC. OR	BMJPFT-030314BOA	237D 95.3	0.025 DA 256.0	43-57-26 124-04-26	204.9	108.69 0.00	0 TRANS
KXJMaux LIC	PORTLAND OR	BLH-981023KC	238C 95.5	40.000 309.0	45-29-20 122-41-40	41.2	95.64 0.00	0 AUX
KXJM LIC	PORTLAND OR	BLH-980901KC	238C 95.5	100.000 386.0	45-29-20 122-41-40	41.2	95.64 -0.36	96 SHORT
NEW-T APP	FLYNN OR	BNPFT-030317MFR	239D 95.7	0.075 180.0	44-33-56 123-20-02	156.8	33.82 0.00	0 TRANS
NEW-T APP	NEWPORT OR	BNPFT-030317DZX	239D 95.7	0.099 152.0	44-38-12 124-01-36	240.9	47.59 0.00	0 TRANS
44444 BEGINNING SEARCH OF SECONDARY DATABASE						44444		
ADD	DALLAS OR		236C3 95.1	0.000 0.0	44-50-43 123-30-07	0.0	0.00 -153.00	153 SHORT
44444 END OF FM SPACING STUDY FOR CHANNEL 236						44444		

## SEARCH PARAMETERS

FM Database Date: 050517

Channel: 252C3 98.3 MHz  
 Latitude: 44 53 8  
 Longitude: 123 5 36  
 Safety Zone: 32 km  
 Job Title: MONMOUTH 252C3

Page 1

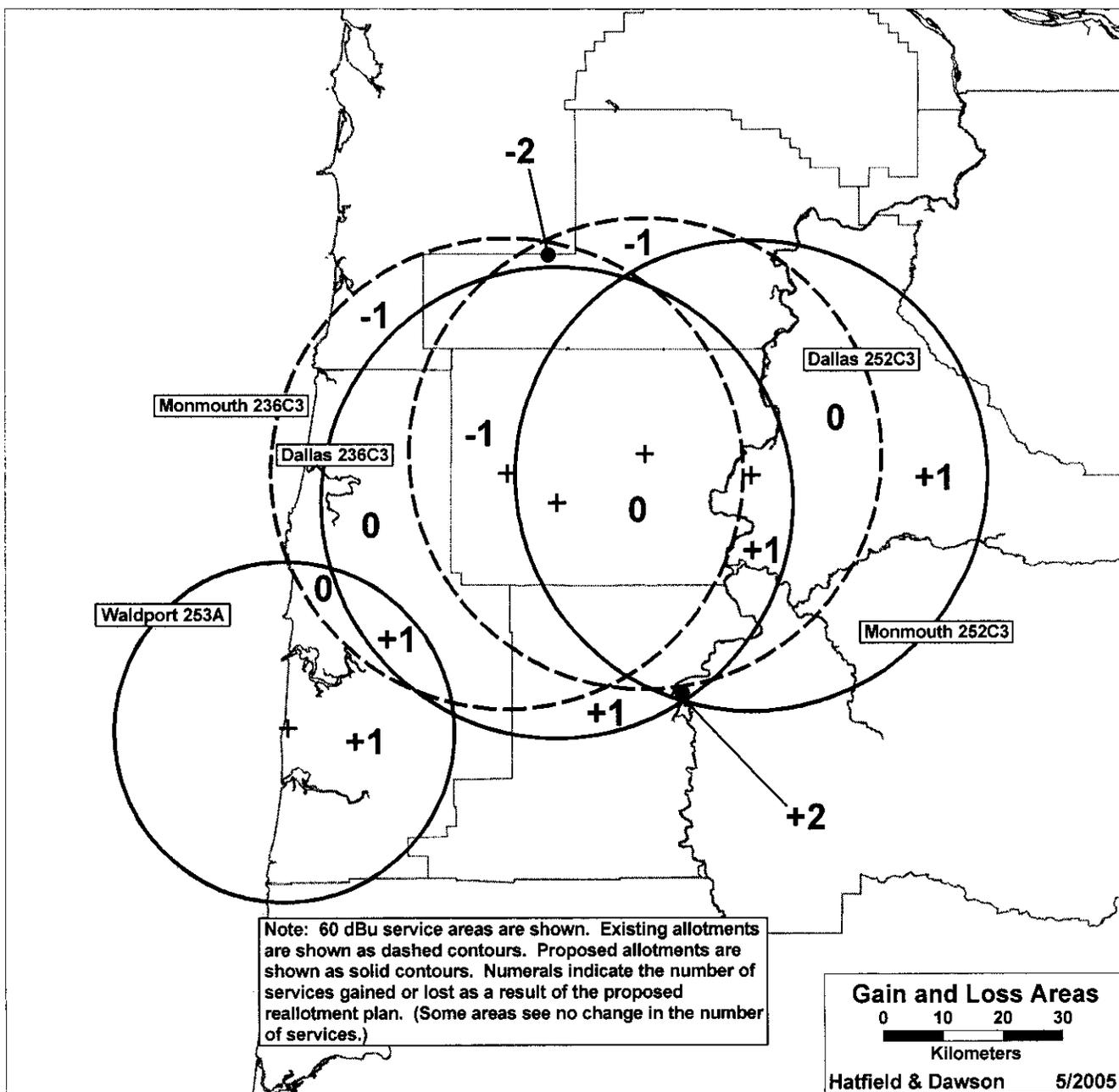
Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K249DK LIC	NEWBERG OR	BLFT-980617TH	249D 97.7	0.013 431.0	45-21-17 122-59-23	8.8	52.77 0.00	0 TRANS
NEW-T APP	SALEM OR	BNPFT-030317IBK	249D 97.7	0.015 320.0	44-51-18 123-07-15	212.5	4.03 0.00	0 TRANS
DEL	EUGENE OR	RM-ajr322	250C 97.9	0.000 0.0	44-00-08 123-06-50	181.0	98.17 2.17	96 CLOSE
KNRQ-FM LIC	EUGENE OR	BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50	181.0	98.17 2.17	96 CLOSE
NEW-T APP	SILVERTON OR	BNPFT-030317AQY	250D 97.9	0.250 366.0	45-00-00 122-41-37	67.8	34.02 0.00	0 TRANS
ADD	TUALATIN OR	RM-ajr322	250C2 97.9	0.000 0.0	45-29-20 122-41-40	24.8	74.02 18.02	56 CLEAR
NEW-T APP	BEAVERTON OR	BNPFT-030317AHR	251D 98.1	0.010 710.0	45-31-21 122-44-45	20.9	75.87 0.00	0 TRANS
ADD	BRIGHTWOOD OR	RM-9870	251C3 98.1	0.000 0.0	45-17-20 121-47-04	66.0	112.37 13.37	99 CLEAR
DEL	BEND OR	RM-9961	252C3 98.3	0.000 0.0	44-04-41 121-19-57	122.1	166.36 13.36	153 CLEAR
KTWS LIC	BEND OR	BLH-041213ACC	252C3 98.3	5.200 223.0	44-04-39 121-19-57	122.1	166.39 13.39	153 CLEAR
VAC	DALLAS OR	-	252C3 98.3	0.000 0.0	44-55-06 123-19-00	281.8	18.01 -134.99	153 SHORT
NOTE:	TO CHANGE TO 236C3 PER THIS PROPOSAL							
NEW-T APP	DEPOE BAY OR	BNPFT-030317HWJ	252D 98.3	0.028 350.0	44-45-24 124-02-50	259.6	76.79 0.00	0 TRANS
NEW-T APP	DEPOE BAY OR	BNPFT-030827APV	252D 98.3	0.028 329.0	44-45-24 124-02-53	259.6	76.86 0.00	0 TRANS

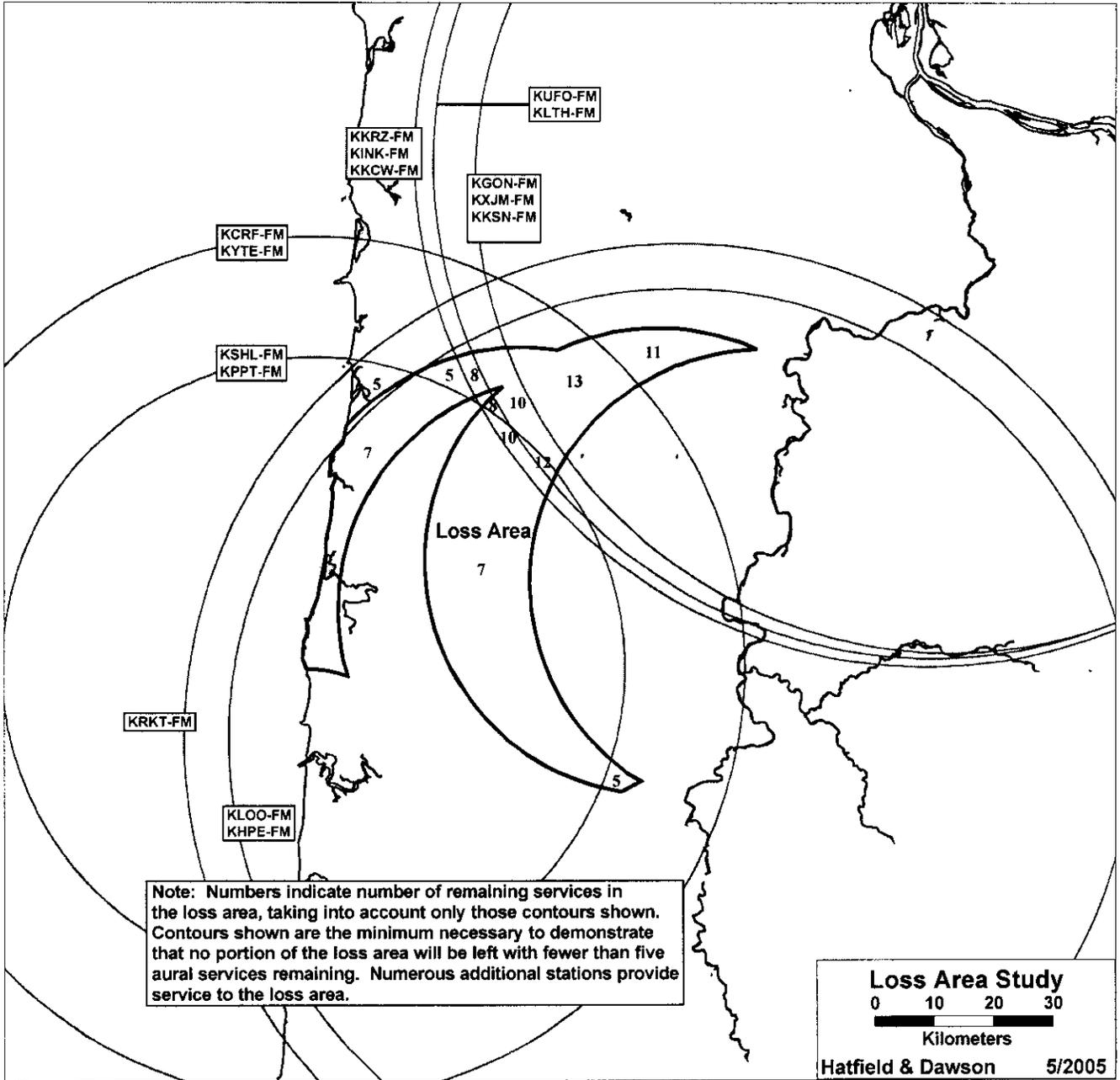
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SEARCH PARAMETERS                               FM Database Date: 050517
Channel: 252C3 98.3 MHz                        Page 2
Latitude: 44 53 8
Longitude: 123 5 36
Safety Zone: 32 km
Job Title: MONMOUTH 252C3
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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KJNI CP	RAINIER OR	BNPH-041213ABF	252A 98.3	1.600 195.0	46-10-59 122-57-29	4.1	144.59	142 CLOSE
K252EN CP	ROCKFORD OR	BNPFT-030825AIY	252D 98.3	0.250 120.0	45-42-08 121-32-05	52.8	152.27	0 TRANS
K252DL LIC	WALTON OR	BLFT-020619AAS	252D 98.3	0.008 580.0	44-04-00 123-37-42	205.2	100.46	0 TRANS
K252EP CP	LONGVIEW WA	BNPFT-030826ABM	252D 98.3	0.023 335.0	46-02-59 122-55-10	5.9	130.10	0 TRANS
ADD	BEND OR	RM-10684	253C1 98.5	0.000 0.0	44-04-41 121-19-57	122.1	166.36	144 CLEAR
K253AU CP	YACHATS OR	BNPFT-030826ALB	253D 98.5	0.250 95.0	44-26-34 124-04-12	237.8	91.76	0 TRANS
KUPL-FM LIC	PORTLAND OR	BLH-970915KD	254C1 98.7	37.000 440.0	45-30-58 122-43-59	21.8	75.58	76 SHORT
KUPLaux LIC	PORTLAND OR	BXLH-031107AAG	254C1 98.7	11.000 362.0	45-30-57 122-43-52	21.9	75.61	0 AUX
KUPLaux LIC	PORTLAND OR	BXMLH-000316ABX	254C1 98.7	16.000 337.0	45-27-13 122-32-45	34.0	76.41	0 AUX
44444 BEGINNING SEARCH OF SECONDARY DATABASE 44444								
ADD	MONMOUTH OR		252C3 98.3	0.000 0.0	44-53-08 123-05-36	0.0	0.00	153 SHORT
ADD	WALDPORT OR		253A 98.5	0.000 0.0	44-30-06 124-04-30	241.5	88.74	89 SHORT
44444 END OF FM SPACING STUDY FOR CHANNEL 252 44444								

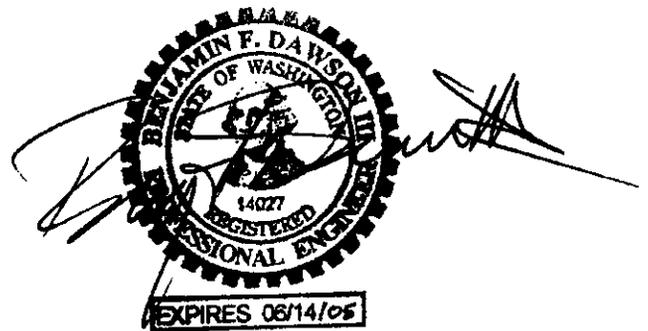




**Statement of Engineer**

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Dallas, Monmouth, and Waldport, Oregon, has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 27<sup>th</sup> day of May, 2005



Benjamin F. Dawson III, P.E.

A handwritten signature in black ink, appearing to read "Erik C. Swanson".

Erik C. Swanson

Hatfield & Dawson Consulting Engineers