

ORIGINAL

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

In the Matter of )  
)  
Amendment of Section 73.202(b) )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Laramie, Wyoming; Cheyenne, Wyoming; )  
and Ault, Colorado) )

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

RECEIVED

JUL 24 2006

To: Secretary, Federal Communications Commission  
Attn: Allocations Branch

Federal Communications Commission  
Office of Secretary

PETITION FOR RECONSIDERATION

Laramie Mountain Broadcasting, LLC ("Laramie Mountain"), licensee of broadcast station KRQU(FM), Laramie, Wyoming, pursuant to Rule 1.429, files this Petition for Reconsideration of the Commission's June 23, 2006, letter dismissing Laramie Mountain's Petition for Reconsideration and returning its Petition for Rulemaking as unacceptable for filing. Laramie Mountain is filing this Petition for Reconsideration because the Commission's letter action is based on new grounds not previously raised and on new facts.<sup>1</sup>

In its Petition for Rulemaking, Laramie Mountain requested that KRQU's Channel 283C2 in Laramie, Wyoming, be upgraded to Channel 280C1 and that Channel 280C1 be reallocated to Ault, Colorado. In order to accommodate this request, Laramie Mountain requested that Channel

<sup>1</sup> Section 1.1429(b)(3) provides that, where the Petition relies on facts not previously presented, it will be accepted if the Commission "determines that the consideration of the facts relied on is required of the public interest." See, *Paul J. Broyles 19 FCC Rcd 22043 (2004)* (application for review raising new matters treated as a further Petition for Reconsideration). See also, *In re: Flexibility in the 218 to 219 MHz Service 17 FCC Rcd 8520 (2002)* (order on second Petition for Reconsideration).

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277C2 be substituted for, vacant at that time, Channel 280C2 in Cheyenne, Wyoming.<sup>22</sup> Laramie Mountain also requested that new Channel 283C2 be allocated to Laramie, Wyoming, from a site that would be fully spaced for the use of Channel 280C1 in Ault, Colorado.

By letter dated September 29, 2004, the Commission returned Laramie Mountain's Petition for Rulemaking "because the proposed transmitter site for Channel 277C2 at Cheyenne is short spaced by 38.8 kilometers to the licensed facilities of station KARS-FM, Channel 275C in Laramie, Wyoming." In its Petition for Reconsideration filed on October 29, 2004, Laramie Mountain noted that the proposed transmitter site for Channel 277C2 at Cheyenne was no longer short spaced. KARS-FM filed a license application for new facilities to cover a construction permit to change its transmitter site and downgrade to Channel 275C1 at a location that is fully spaced with the proposed use of Channel 277C2 in Cheyenne, Wyoming.

In its recent June 23, 2006, letter decision, the Commission noted that, "we agree that the Cheyenne Channel 277C2 proposal is no longer short spaced to Station KARS-FM." However the Laramie Mountain Rulemaking Petition was deemed unacceptable for filing because, "the rule making does not comply with Section 73.315(a) of the Commission's Rules, which requires that a petitioner select reference coordinates that will provide signal coverage with a field strength of at least 70 dBu over the entire principal community to be served," and that specifically, "the proposed transmitter site for Channel 277C2 will not provide a 70dBu signal that completely encompasses Cheyenne, Wyoming."

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<sup>22</sup> College Creek Broadcasting, Inc., has since become the high bidder for Channel 280C2. It filed a 301 application to operate on 280C2 but acknowledged the pendency of the previously filed Laramie Mountain Rulemaking and the proposed substitution of Channel 277C2 for 280C2 in Cheyenne.

The proposed transmitter site specified by Laramie Mountain for Channel 277C2 will provide the requisite 70 dBu signal to completely encompass Cheyenne, Wyoming. As demonstrated in the attached engineering, operation of Channel 277C2 at the proposed allocation point at 12.5 kW, 2089.6 meters AMSL, on a tower 200 meters AGL, will provide a city grade signal over Cheyenne. Rule 73.315(a) provides that "the transmitter location shall be chosen so that, on the basis of the effective radiated power and antenna height above average terrain employed, a minimum field strength of 70 dBu...will be provided over the entire principal community to be served." The attached engineering demonstrates that this can be done from the proposed allocation point.<sup>3</sup> It is true that based upon the presumption of uniform terrain and maximum permissible facilities (50 kW ERP and 150 meters) the proposed allocation point for the Channel 277C2 Cheyenne does not quite cover Cheyenne with the requisite city grade coverage. However, 73.315(a) only requires that a proponent demonstrate that the requisite coverage be provided. This can be done using a 277 meter tower. Even in instances where a proponent can not demonstrate the requisite city grade coverage using the Commission's predicted method, the Commission will allow a proponent to make a special showing where the actual terrain deviates sufficiently from the uniform terrain causing the 70 dBu contour to extend further than the predicted distance. *See, Woodstock and Broadway, Virginia*, 3 FCC Rcd 6398 (1998). *Dos Palos, Chivalar, Big Sur, CA*, 19 FCC Rcd 1826 at ¶20 (2004). Here it is evident

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<sup>3</sup> White Park Broadcasting, Inc., was the high bidder for Channel 277A in Hanna, Wyoming. Although the attached engineering seems to indicate short spacing to 277A in Hanna, Wyoming, White Park Broadcasting, Inc.'s FCC Form 301 application for Channel 277A in Hanna requested 73.215 processing and demonstrated compliance with the contour protection rules towards Channel 277C2 in Cheyenne, Wyoming.

that even using the Commission's predictive method that the requisite city grade coverage can be obtained.<sup>4</sup>

The public interest would clearly be served by the proposed Amendment to the Table of Allotments proposed by Laramie Mountain.<sup>5</sup> In sum, the proposal would result in a first transmission service to Ault, Colorado and will vastly improve the service currently provided by KRQU. The reallocation of Channel 280C1 to Ault, Colorado will result in 1 mV signal coverage to approximately 16,656 square kilometers and 604,178 people, which compares to the current coverage of KRQU of approximately 7,831 square kilometers and 33,619 people. This results in a net gain in service to 570,559 people and an additional 8,825 square miles. In addition, the proposal will result in allocation to Laramie, Wyoming, of a new Channel 283 with a site restriction of 12 kilometers NW of Laramie, Wyoming.

The following is a summary of the proposed changes to the FM table of allotments, 73.202(b)(1):

<b>COMMUNITY</b>	<b>PRESENT</b>	<b>PROPOSED</b>
Cheyenne, WY	229A, 250C1, 260C2, 264C1, 280C2, 285C2, 292A	229A, 250C1, 260C2, 264C1, 277C2, <sup>6</sup> 285C2, 292A
Laramie, WY	236C, 244C2, 254A, 275C, 283C2	236C, 244C2, 254A, 275C1, 283C2 <sup>7</sup>
Ault, CO	-----	280C1 <sup>8</sup>

<sup>4</sup> As noted in the Technical Statement, city grade coverage is easily demonstrated using Longley-Rice. Also as demonstrated in the attached TowAir analysis, it appears there should be no apparent problem obtaining FAA approval.

<sup>5</sup> Laramie Mountain incorporates its Petition for Rulemaking and attached engineering.

<sup>6</sup> Allotment point 41° 22' 59"N, 104° 40' 06" W, site restriction 30.4 km northeast of Cheyenne, Wyoming.

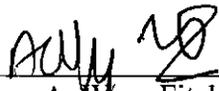
<sup>7</sup> Proposed allotment point 41° 23' 00" N, 105° 41' 48"W -- site restriction 12 km northwest of Laramie, Wyoming.

<sup>8</sup> Allotment point 40° 45' 00" N, 105° 09' 12" W, site restriction 40.3 km northwest of Ault, Colorado.

Laramie Mountain incorporates its Petition for Rulemaking and hereby expresses its intention to file an application to operate on Channel 280C1 in Ault, Colorado, and if granted, to build the facility expeditiously. Laramie Mountain will also participate in an auction and file an application for Channel 283C2 in Laramie, Wyoming, as reallocated and, if its application is granted, will build the station promptly.

Respectfully submitted,

**LARAMIE MOUNTAIN BROADCASTING, LLC**

By:  \_\_\_\_\_  
A. Wray Fitch III  
Its Counsel

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July 24, 2006

## TECHNICAL STATEMENT

This technical statement is in support of the Petition for Rulemaking being filed by Laramie Mountain Broadcasting, LLC in regards to its proposed city of license change for KRQU Laramie, Wyoming to Ault, Colorado on Channel 280C1.

This statement is to show that from the original proposed allotment point for the substitute channel at Cheyenne, channel 277C2, that 277C2 can provide the required 70 dbu city grade contour over the entire community of Cheyenne, Wyoming.

The original allotment point proposed at Cheyenne is N. 41-22'-59", W 104-40'-06". To provide city grade coverage over the entire community, the antenna height would need to be raised to provide line of sight coverage into Cheyenne. At a center of radiation of 2089.6 meters, about 277 meters above the ground, 70 dbu service could be provided to Cheyenne operating at 12.5 KW, effective radiated power.

Figure 5 of this exhibit shows the contour for these facilities labeled as Site 1.

The original allotment point could be relocated slightly to improve the 70 dbu coverage over Cheyenne. An allotment point located at N. 41-21'-50", W. 104-40'-17" would meet all current spacing requirements towards other stations. The only exception is the new CP located at Hanna, WY on channel 277A. However, this station used 73.215 spacing towards the proposed allotment point at Cheyenne, so as long as spacing would not be increased towards the Hanna CP, it would be allowed. In this case the spacing would increase slightly from 154.15 kilometers to 154.48 kilometers. Figure 1 shows the original allotment point spacing for Cheyenne, Figure 2 shows this new allotment point mention above.

Technical Statement (continued)

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Once again, Figure 5 shows the 70 dbu coverage contour for this new possible allotment point, labeled as site "2". It shows further predicted city grade coverage towards Cheyenne.

Figure 3 shows yet another possible allotment point for the new channel 277C2 for use at Cheyenne. While it shows a potential short spacing towards KRFX Denver, Colorado on channel 278C, this short spacing has been potentially eliminated by the proposed downgrade of KRFX from a Class C to a Class C0. A Report and Ordered has been issued for KRFX to be downgraded to a class C0, however a Petition for Reconsideration has been filed. With this additional spacing, even further 70 dbu service could be provided to Cheyenne from channel 277C2 as can be seen again with figure 5, as site "3". This site is located at N. 41-18'-56", W. 104-37'-13". This site would require an adjustment to the new proposed allotment point for channel 280C1 at Ault, Colorado for use by KRQU. This site is at N. 40-44'-42", W. 105-12'-13". Figure 4 shows a spacing study that shows this would still be a valid location for Channel 280C1 at Ault, Colorado.

Figure 7 shows a Longley Rice coverage contour map for the original allotment point for channel 277C2 at Cheyenne. With the same 12.5 KW ERP (the maximum allowed for a class C2) at a center of radiation of 2089.6 meters above mean sea level. It

## Technical Statement

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also clearly shows that 70 dbu service would be provided to Cheyenne from this allotment point. This model was conducted with the Land Cover option turn on.

Figure 8 shows a terrain profile from the original allotment point to the southwest edge of Cheyenne. It also clearly shows that line of sight coverage will be provided to Cheyenne.

Figure 9 shows a topographic map showing the original allotment point for channel 277C2 at Cheyenne. It shows the ground elevation to be 5980 feet or 1823 meters. It would require a tower of 277 (909 feet) meters above ground to provide the required 70 dbu service to Cheyenne. However, Figure 10, shows a tower air study, that concluded that while it would require FAA clearance, it is not located within 8 kilometers of any public used airport.

In conclusion, it was found that the original allotment point could provide the required the required 70 dbu service over the Community of license, Cheyenne, Wyoming. It may require a relatively tall tower, but that such a tower could likely be constructed. With the pending downgrade of KRFX Denver on channel 278C, a less restrictive allotment point for use of channel 277C2 at Cheyenne will be realized. Also, the original proposed allotment point was not the optimum location for an allotment point of channel 277C2 at Cheyenne. As shown, using rounding methods, a less restrictive allotment point could be used at Cheyenne.

Technical Statement

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Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Victor A. Michael, Jr.", written in a cursive style.

Victor A. Michael, Jr.  
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July 24, 2006

FIGURE 1, Channel Spacing Study, Channel 277C2  
 Cheyenne, WY, Current Allotment Point

REFERENCE  
 41 22 59 N.  
 104 40 06 W.

CLASS = C2  
 Current Spacings

DISPLAY DATES  
 DATA 07-22-06  
 SEARCH 07-24-06

----- Channel 277 - 103.3 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 277C2	Cheyenne	WY 0.0	0.00	190.0	-190.00
RDEL	DEL 280C2	Cheyenne	WY 203.0	29.55	58.0	-28.45
NEW .C	CP 280C2	Cheyenne	WY 180.0	29.55	58.0	-28.45
NEW .C	CP -Z 277A	Hanna	WY 285.2	154.15	166.0	-11.85
AU062	VAC 277A	Hanna	WY 289.5	167.12	166.0	1.12
RDEL	DEL 278C	Denver	CO 194.8	189.67	188.0	1.67
KRFX	LIC 278C	Denver	CO 194.8	189.67	188.0	1.67
RADD	ADD 280C1	Ault	CO 210.2	81.26	79.0	2.26
RADD	ADD 278C0	Denver	CO 194.8	189.67	176.0	13.67
KARSFM	LIC 275C1	Laramie	WY 237.1	102.95	79.0	23.95
KAVD.A	APP 276C0	Parker	CO 167.6	209.54	176.0	33.54
AL276	RSV 276C	Parker	CO 165.9	222.83	188.0	34.83
KAVD.C	CP 276C	Parker	CO 165.0	223.46	188.0	35.46
KAVD	RSV 276C0	Parker	CO 167.7	213.17	176.0	37.17
KAVD.A	APP 276C0	Parker	CO 167.7	213.17	176.0	37.17
KAVD	RSV 276C0	Parker	CO 167.7	213.17	176.0	37.17
KOZYFM	LIC 280C3	Gering	NE 55.9	96.38	56.0	40.38
RADD	ADD 274C2	Potter	NE 98.8	114.80	58.0	56.80
KAVD	LIC-N 276C1	Limon	CO 157.4	229.74	158.0	71.74
AU062	VAC 277A	Baggs	WY 262.2	253.56	166.0	87.56
AP277	APP 277A	Baggs	WY 262.2	253.56	166.0	87.56
KDAD.C	CP 223C1	Douglas	WY 327.2	117.46	27.0	90.46
KQLT	LIC 279C	Casper	WY 318.7	203.15	105.0	98.15
AP278	APP 278C	Baggs	WY 263.9	301.17	188.0	113.17
RS278	RSV 278C	Baggs	WY 263.9	301.17	188.0	113.17
KWLI	LIC-D 223C1	Broomfield	CO 187.9	144.22	27.0	117.22
RADD	ADD 279C1	Akron	CO 135.1	206.15	79.0	127.15

## TOWAIR Determination Results

### \*\*\* NOTICE \*\*\*

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

#### DETERMINATION Results

**This structures requires registration. The antenna structure is taller than 60.96 meters (200 feet) and does not meet the criteria for the 6.10-meter (20-foot) Rule exception.**

#### Your Specifications

##### NAD83 Coordinates

Latitude	41-22-59.0 north
Longitude	104-40-08.0 west

##### Measurements (Meters)

Overall Structure Height (AGL)	277
Support Structure Height (AGL)	277
Site Elevation (AMSL)	1823

##### Structure Type

TOWER - Free standing or Guyed Structure used for Communications Purposes

#### **Tower Construction Notification**

Notify Tribes and Historic Preservation Officers of your plans to build a tower.  
Note: Notification does NOT replace [Section 106 Consultation](#).

CLOSE WINDOW

FIGURE 2, Channel Spacing Study, Channel 277C2  
 Cheyenne, WY, Possible allotment point

REFERENCE  
 41 21 50 N.  
 104 40 17 W.

CLASS = C2  
 Current Spacings

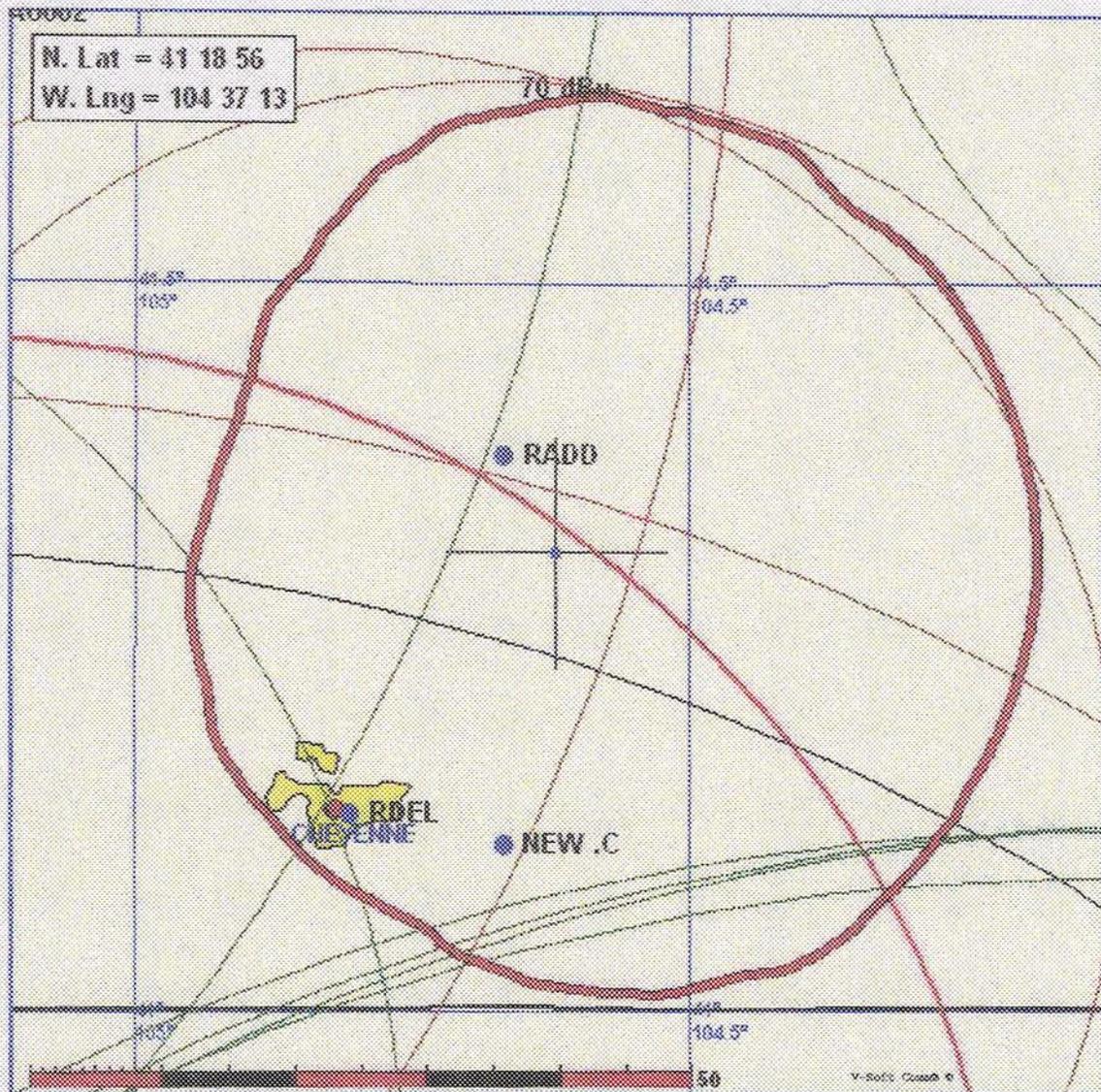
Channel 277 - 103.3 MHz

DISPLAY DATES  
 DATA 07-22-06  
 SEARCH 07-24-06

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 277C2	Cheyenne	WY 6.8	2.14	190.0	-187.86
NEW .C	CP 280C2	Cheyenne	WY 179.5	27.42	58.0	-30.58
RDEL	DEL 280C2	Cheyenne	WY 204.2	27.50	58.0	-30.50
NEW .C	CP -Z 277A	Hanna	WY 285.9	154.47	166.0	-11.53
RDEL	DEL 278C	Denver	CO 194.9	187.55	188.0	-0.45
KRFX	LIC 278C	Denver	CO 194.9	187.55	188.0	-0.45
RADD	ADD 280C1	Ault	CO 210.8	79.30	79.0	0.30
AU062	VAC 277A	Hanna	WY 290.2	167.61	166.0	1.61
RADD	ADD 278C0	Denver	CO 194.9	187.55	176.0	11.55
KARSEFM	LIC 275C1	Laramie	WY 238.1	101.60	79.0	22.60
KAVD.A	APP 276C0	Parker	CO 167.4	207.51	176.0	31.51
AL276	RSV 276C	Parker	CO 165.7	220.83	188.0	32.83
KAVD.C	CP 276C	Parker	CO 164.8	221.47	188.0	33.47
KAVD	RSV 276C0	Parker	CO 167.5	211.15	176.0	35.15
KAVD.A	APP 276C0	Parker	CO 167.5	211.15	176.0	35.15
KAVD	RSV 276C0	Parker	CO 167.5	211.15	176.0	35.15
KOZYFM	LIC 280C3	Gering	NE 55.0	97.79	56.0	41.79
RADD	ADD 274C2	Potter	NE 97.7	114.75	58.0	56.75
KAVD	LIC-N 276C1	Limon	CO 157.1	227.88	158.0	69.88
AU062	VAC 277A	Baggs	WY 262.7	253.03	166.0	87.03
AP277	APP 277A	Baggs	WY 262.7	253.03	166.0	87.03
KDAD.C	CP 223C1	Douglas	WY 327.8	119.12	27.0	92.12
KQLT	LIC 279C	Casper	WY 319.2	204.58	105.0	99.58
AP278	APP 278C	Baggs	WY 264.3	300.69	188.0	112.69
RS278	RSV 278C	Baggs	WY 264.3	300.69	188.0	112.69
KWLI	LIC-D 223C1	Broomfield	CO 187.9	142.08	27.0	115.08
RADD	ADD 279C1	Akron	CO 134.6	204.83	79.0	125.83

# CH 277 C2, 103.3 MHz

Figure 3, Channel spacing study and contour, Possible allotment point at Cheyenne, Ch. 277C2



Call	CH#	Type	Location	Azi	D-KM	FCC	Margin	
RADD	277C2	ADD	Cheyenne	WY	331.9	8.49	190.0	-181.51
NEW .C	280C2	CP	Cheyenne	WY	190.4	22.43	58.0	-35.57
RDEL	280C2	DEL	Cheyenne	WY	218.3	25.13	58.0	-32.87
NEW .C	277A	CP -Z	Hanna	WY	287.4	160.11	166.0	-5.89
KRFY	278C*	LIC	Denver	CO	196.6	183.56	188.0	-4.44
RDEL	278C	DEL	Denver	CO	196.6	183.56	188.0	-4.44
RADD	280C1	ADD	Ault	CO	215.6	77.17	79.0	-1.83
AU062	277A	VAC	Hanna	WY	291.4	173.51	166.0	7.51
RADD	278C0	ADD	Denver	CO	196.6	183.56	176.0	7.56
KARFYM	275C1	LIC	Laramie	WY	241.9	102.63	79.0	23.63
KAVD.A	276C0	APP	Parker	CO	168.3	201.37	176.0	25.37
AL276	276C	RSV	Parker	CO	166.5	214.60	188.0	26.60
KAVD.C	276C	CP	Parker	CO	165.6	215.19	188.0	27.19
KAVD	276C0	RSV	Parker	CO	168.4	205.01	176.0	29.01
KAVD	276C0	RSV	Parker	CO	168.4	205.01	176.0	29.01
KAVD.A	276C0	APP	Parker	CO	168.4	205.01	176.0	29.01
KOZYFM	280C3	LIC	Gering	NE	51.0	97.59	56.0	41.59

Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
RADD	274C2	ADD	Potter	NE	95.3	109.89	58.0	51.89
KAVD	276C1	LIC N	Limon	CO	157.6	221.28	158.0	63.28
AP277	277A	APP	Baggs	WY	264.0	256.66	166.0	90.66
AU062	277A	VAC	Baggs	WY	264.0	256.66	166.0	90.66
KDAD.C	223C1	CP	Douglas	WY	327.5	125.93	27.0	98.93
KQLT	279C	LIC	Casper	WY	319.3	211.43	105.0	106.43
KWLI	223C1	LIC-D	Broomfield	CO	190.0	137.45	27.0	110.45
AP278	278C	APP	Baggs	WY	265.4	304.48	188.0	116.48
RS278	278C	RSV	Baggs	WY	265.4	304.48	188.0	116.48
RADD	279C1	ADD	Akron	CO	134.4	198.03	79.0	119.03

Figure 4, Ault, Colorado, Allotment Point

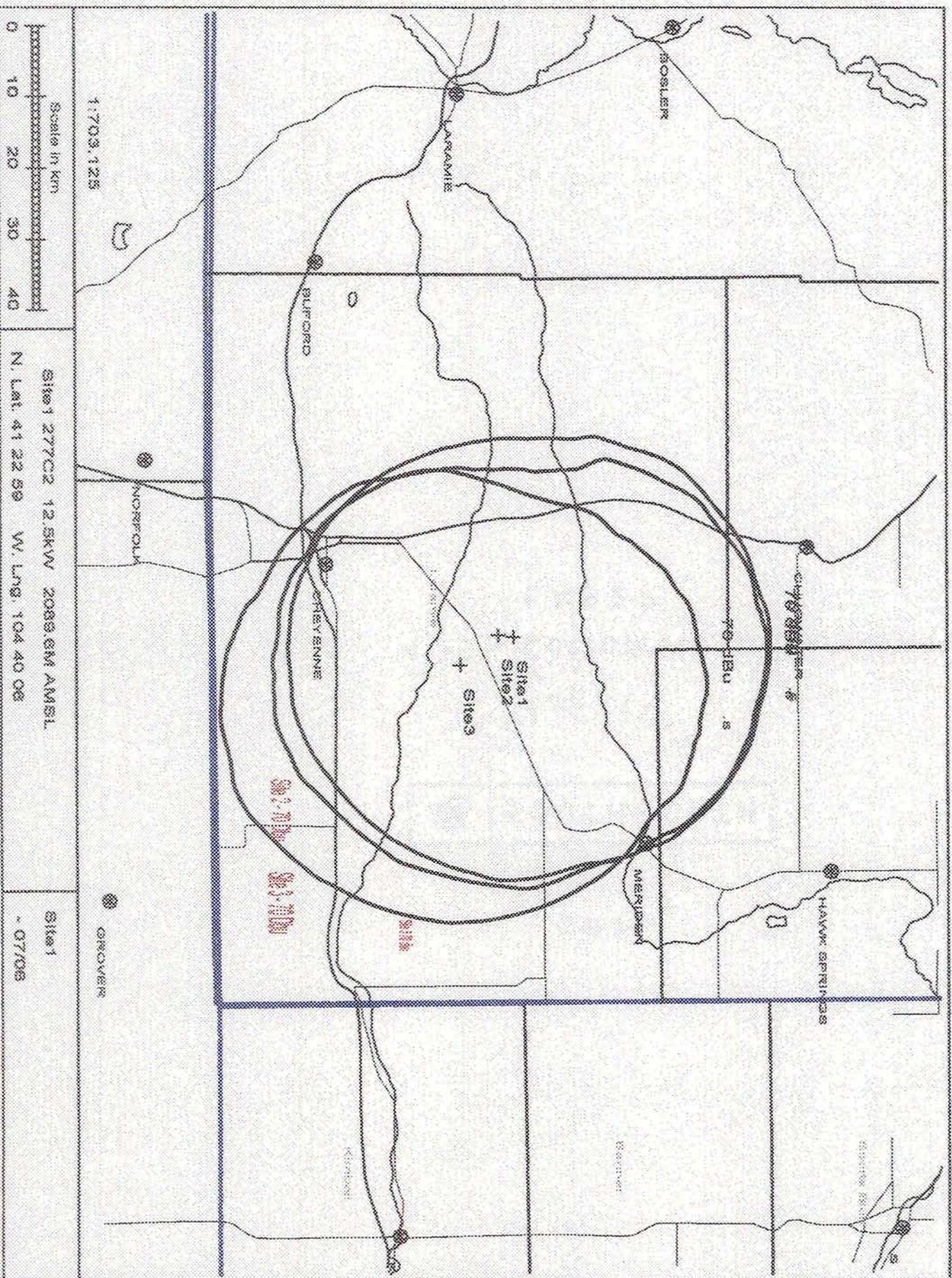
REFERENCE  
40 44 42 N.  
105 12 13 W.

CLASS = C1  
Current Spacings

DISPLAY DATES  
DATA 07-22-06  
SEARCH 07-24-06

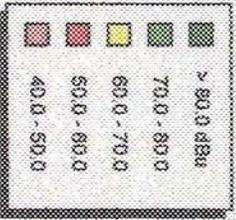
----- Channel 280 - 103.9 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 280C1	Ault	CO 82.5	4.28	245.0	-240.72
RDEL	DEL 280C2	Cheyenne	WY 37.2	55.00	224.0	-169.00
NEW .C	CP 280C2	Cheyenne	WY 47.2	61.12	224.0	-162.88
KOZYFM	LIC 280C3	Gering	NE 44.7	176.58	211.0	-34.42
KRQU	LIC 283C2	Laramie	WY 341.7	66.25	79.0	-12.75
KYZX	LIC-N 280C2	Pueblo West	CO 172.4	224.04	224.0	0.04
RDEL	DEL 283C2	Laramie	WY 346.9	81.89	79.0	2.89
RADD	ADD 283C2	Laramie	WY 329.9	82.11	79.0	3.11
RADD	ADD 277C2	Cheyenne	WY 32.1	83.93	79.0	4.93
KRFX	LIC 278C	Denver	CO 181.4	112.67	105.0	7.67
RDEL	DEL 278C	Denver	CO 181.4	112.67	105.0	7.67
KFMUFM	LIC-N 281C3	Oak Creek	CO 248.7	152.55	144.0	8.55
KRQU	RSV 283C3	Laramie	WY 323.7	91.82	76.0	15.82
KRQU.A	APP 283C3	Laramie	WY 323.7	91.82	76.0	15.82
RADD	ADD 278C0	Denver	CO 181.4	112.67	94.0	18.67
KANT.C	CP 281C2	Guernsey	WY 4.5	178.55	158.0	20.55
KSNOFM	LIC 280A	Snowmass Village	CO 221.8	221.67	200.0	21.67
RADD	ADD 279C1	Akron	CO 111.2	205.20	177.0	28.20
KQLT	LIC 279C	Casper	WY 337.9	240.25	209.0	31.25
KJCD	LIC-N 282C1	Longmont	CO 178.4	116.54	82.0	34.54
KTCL	LIC-Z 227C	Fort Collins	CO 160.4	76.46	41.0	35.46
RDEL	DEL 227C	Fort Collins	CO 160.4	76.46	41.0	35.46
RADD	ADD 282C3	Pine Bluffs	WY 56.9	125.02	76.0	49.02
NEW .C	CP -Z 277A	Hanna	WY 316.7	151.76	75.0	76.76
KTCL.A	APP-D 227C1	Wheat Ridge	CO 181.4	112.39	34.0	78.39
RADD	ADD 227C0	Wheat Ridge	CO 176.8	119.36	37.0	82.36
KBVC	LIC-N 281C3	Buena Vista	CO 201.3	237.78	144.0	93.78
AU062	VAC 277A	Hanna	WY 318.1	169.09	75.0	94.09
RDEL	DEL 281C1	Burlington	CO 121.8	298.44	177.0	121.44
KNABFM	LIC 281C1	Burlington	CO 121.8	298.44	177.0	121.44



**RADD**

Latitude: 41°22'59" N  
 Longitude: 104°40'09" W  
 ERP: 12.99 kW  
 Channel: 277  
 Frequency: 103.3 MHz  
 AMSL Height: 2099.8 m  
 Elevation: 1812.209 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop. Model: Longley/Rice  
 Climate: Cont. temperate  
 Conductivity: 0.0060  
 Dielec Const: 15.0  
 Refractivity: 311.0  
 Receiver Ht AG: 9.1 m  
 Receiver Gain: 0 dB  
 Time Variability: 50.0%  
 St. Variability: 50.0%  
 TTM Mode: Broadcast



**FIGURE 7**

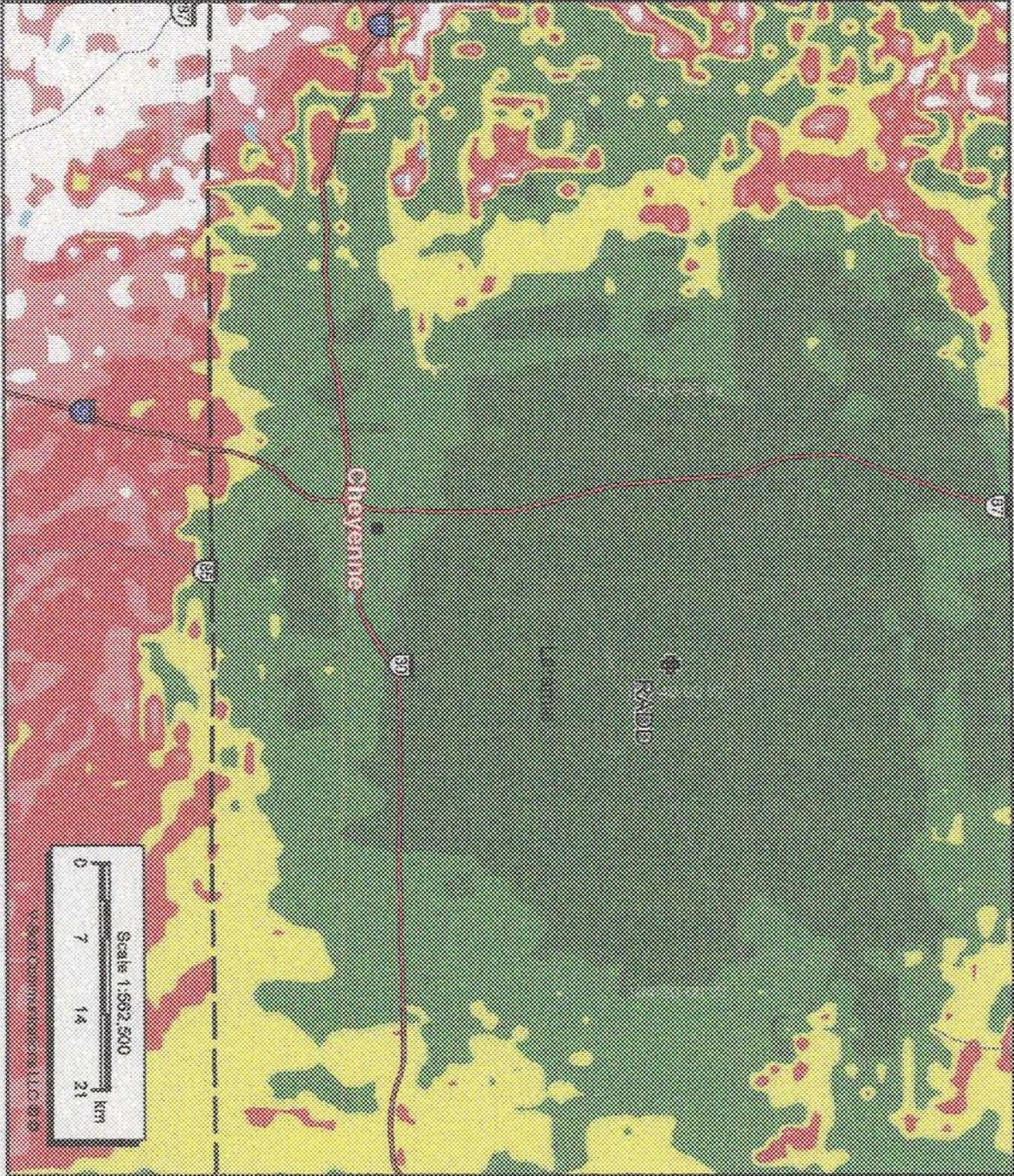
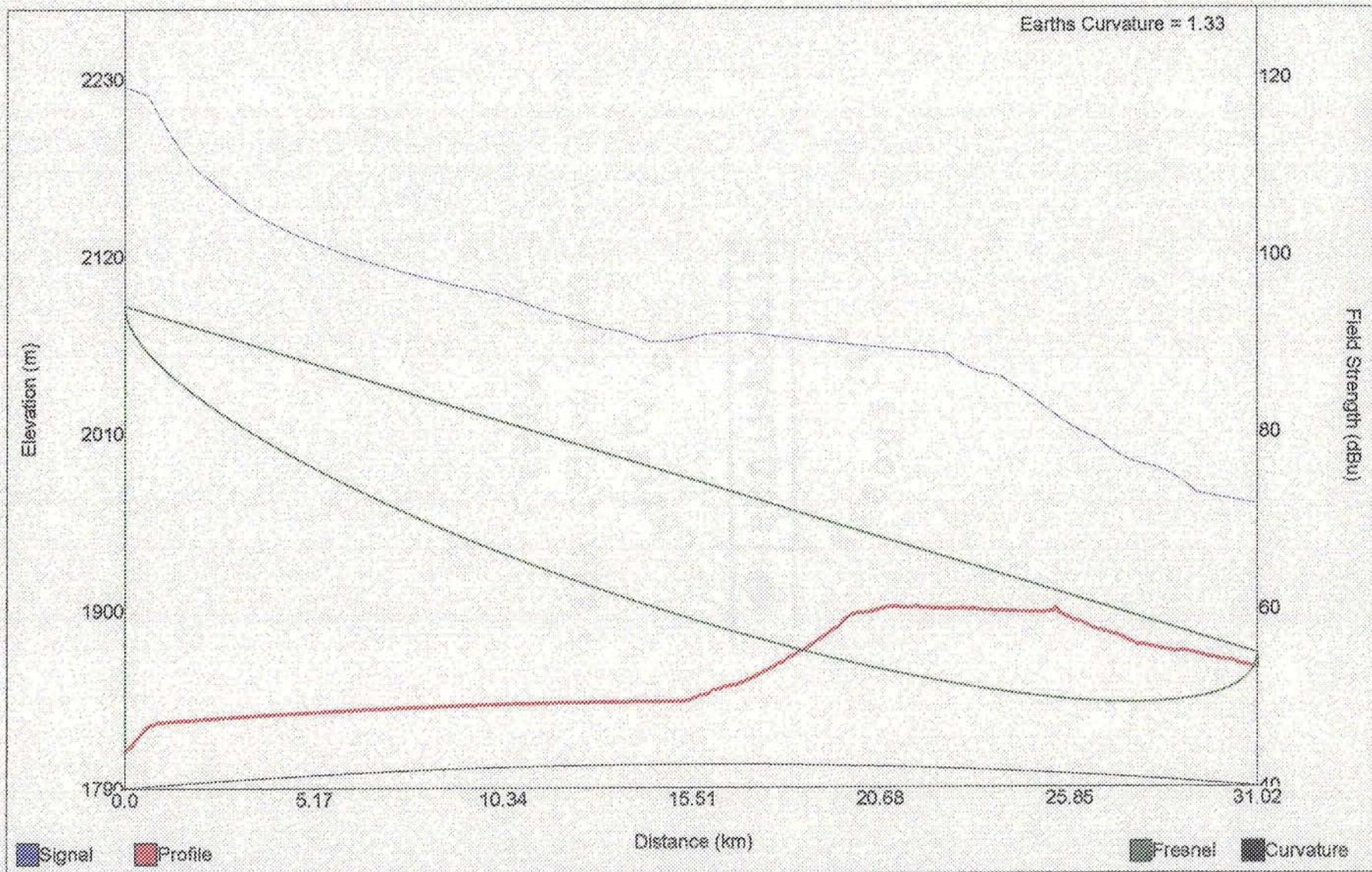


Figure 8, Terrain Profile towards Cheyenne from allotment point, channel 277C2



Starting Latitude: 41-22-59 N  
Starting Longitude: 104-40-06 W

End Latitude: 41-07-51.78 N  
End Longitude: 104-49-40.83 W

Distance: 31.02 km  
Bearing: 205.61 deg

Transmitter Height (AG) = 277.4 m  
Receiver Height (AG) = 9.1 m

Transmitter Elevation = 1812.2 m  
Receiver Elevation = 1863.5 m

Frequency = 103.3 MHz  
Fresnel Zone: 0.6

**CERTIFICATE OF SERVICE**

I, Stephanie Patton, in the law offices of Gammon & Grange, P.C., hereby certify that I have sent this 24th day of July, 2006, by first-class, postage prepaid, U.S. Mail, copies of the foregoing PETITION FOR RECONSIDERATION to the following:

John A. Karousos  
Assistant Chief, Audio Division  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Kenneth D. Salomon  
Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Ave., N.W., Suite 800  
Washington, D.C. 20036-6802

  
Stephanie Patton