

**ORIGINAL**

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

**FILED/ACCEPTED**

**JAN 19 2007**

Federal Communications Commission  
Office of the Secretary

In the Matter of: )  
)  
Amendment of Section 73.202(b) ) RM- \_\_\_\_\_  
Table of Allotments, )  
FM Broadcast Stations )  
(Independence, Solon, )  
Maquoketa and Asbury, Iowa, and )  
Mineral Point, Wisconsin) )

To: Marlene H. Dortch, Secretary, Federal Communications Commission

Attention: Audio Division, Media Bureau

**PETITION FOR RULE MAKING**

KM Radio of Independence, L.L.C. ("KM"), licensee of commercial radio station KQMG-FM, Independence, Iowa (Facility ID No. 42080, "KQMG"), by its counsel, and pursuant to Sections 1.401 and 1.420 of the Commission's rules, 47 C.F.R. §§ 1.401 and 1.420, herein petitions the Commission to institute a rule making proceeding to change the channel of vacant reserved allotment of Channel 236A at Asbury, Iowa to Channel 237A at Asbury, Iowa, and allot Channel 238A as a new nonreserved vacant allotment for the proposed community of license of Mineral Point, Wisconsin, as that community's first local radio broadcast service; these changes to the FM Table of Allotments are proposed to accommodate the change in channel and community of license (or reallocation) of KQMG's Channel 237A allotment for Independence, Iowa to Channel 236A at Solon, Iowa as is being proposed in a Form 301 minor change in licensed facilities application being filed simultaneously by KM for KQMG on this date (the "KQMG Application"),

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as well as certain other changes as are set forth herein and/or in the KQMG Application. In support of this Petition for Rule Making (the “Petition”), KM respectfully submits the following:<sup>1</sup>

1. With respect to KQMG, this Petition and the KQMG Application are being filed in accordance with Section 1.420(i) of the Commission rules, § 1.420(i), which permits the modification of a station’s authorization to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest, where the amended allotment is mutually exclusive with the station’s current assignment. Id. The proposed change in channel and community of license for KQMG to Channel 236A serving Solon, Iowa, is mutually exclusive with KQMG’s present assignment of Channel 237A at Independence, Iowa. See Technical Exhibit at Figure 4.

2. **Summary of Proposed Changes.** By this Petition and the KQMG Application, KM proposes to:

(i) change the channel and community of license of KQMG from its present assignment of Channel 237A at Independence, Iowa to Channel 236A serving Solon, Iowa, by the KQMG Application;

(ii) to accommodate the KQMG channel and community of license change, the KQMG Application triggers the downgrade of Class C station KGGO(FM), Channel 235C, Des Moines, Iowa (Facility ID No. 12965, “KGGO”), to a Class C0 station;

(iii) to accommodate the KQMG channel and community of license change, this Petition and the KQMG Application also request a change in channel for station KMAQ-FM,

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<sup>1</sup> This Petition and the KQMG Application are also supported by the Technical Exhibit of du Treil, Lundin & Rackley, Inc. dated January 17, 2007, a copy of which is attached hereto (the “Technical Exhibit”).

Channel 236A, Maquoketa, Iowa (Facility ID No. 39857. “KMAQ”) from Channel 236A to Channel 237A, and KM requests that the Commission issue an order to show cause to the licensee of KMAQ regarding same;

(iv) to accommodate the channel change for KMAQ, this Petition requests a change in channel for the vacant reserved Channel 238A allotment for Asbury, Iowa, to reserved Channel 254A at Asbury, Iowa; and

(v) the proposed change in the channel for the vacant reserved allotment for Asbury, Iowa, permits this Petition to also request the allocation of a new nonreserved vacant allotment of Channel 238A for Mineral Point, Wisconsin, as that community’s first local radio transmission service. See Technical Exhibit at 1 and 6-8. KM hereby certifies that all of changes proposed herein and/or in the KQMG Application may be made in compliance with the Commission’s technical rules, and allotment and separation requirements. Accordingly, KM submits that the changes proposed herein and in the KQMG Application results in a preferential arrangement of allotments and station assignments, would serve the public interest, and therefore should be granted.

3. **KQMG Change in Channel and Community of License to Solon, Iowa.** The community of Solon, Iowa is listed in the 2000 U.S. Census as a city with a population of 1,177 persons; therefore, Solon is a “community” for allotment purposes.<sup>2</sup> According to the Commission’s electronic Consolidated Data Base System (“CDBS”), no other radio or other broadcast station is

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<sup>2</sup> A proposed community of license is considered a “community” for allotment purposes if it is incorporated or listed in the U.S. Census. See, e.g., FM Table of Allotments (Strattanville and Farmington Township, Pennsylvania), DA 00-2711 at ¶ 5 (Allocations Branch, released December 1, 2000).

licensed or allocated to Solon. In contrast, KQMG's present community of license of Independence, Iowa is served by another radio station, KQMG(AM), 1220 kilohertz, Independence, Iowa (Facility ID No. 42077), an unlimited time station which is also licensed to KM, and had a 2000 U.S. Census population of 6,014 persons. Therefore upon a change in the community of license of KQMG to provide Solon with its first local radio transmission service, Independence would still be served by its own fulltime operating local AM radio transmission service.

4. Solon is an independent community which merits its own first local radio transmission service.<sup>3</sup> It has its own zip code (52333, which is only for Solon) and post office; it is governed by elected officials (a mayor and a five-member city council) and six city administration personnel (including a city administrator, a city clerk/treasurer, a public works director, utility specialist, and laborer, and a park and recreation coordinator); it has six authorized boards or commissions, four of which are currently active (a planning and zoning commission, a board of adjustments, a parks and recreation commission, and a library board of trustees); and is governed by its own municipal code. Solon provides municipal services including police protection services (under a contract between the City of Solon with the Johnson County Sheriff's Department), a volunteer fire department (with over thirty members), its own water and sewer services, and a community public library. The city is served by a weekly newspaper (the *Solon Economist*). Recreational opportunities include a local park (Randall Park) and recreational sports leagues run by the city, and community events include the annual "Beef Days" celebration, which has been held for 35 years. Civic opportunities range from an athletic booster club to several civic service

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<sup>3</sup> The facts regarding the City of Solon presented herein generally were obtained from its official website, <http://www.solon-iowa.com>, or other sites linked thereto, unless otherwise cited.

organizations, including an Optimists International #40103 and Knights of Columbus council #12129. Solon has own local public school system, with an elementary school, middle school and a high school, and at least two local churches (including Solon United Methodist Church and a catholic church). The city has a wide variety of local businesses, ranging from health care providers (several doctors and the Solon Family Practice Clinic, and about ten dentists), other professionals (an accountant and over a dozen attorneys), several restaurants, a bank (Solon State Bank), a florist, several realtors, and several barbers and beauty salons, among other businesses to numerous to list.

5. The proposed community of license change to Solon will include a change in the transmitter site for KQMG, to a proposed new transmitter site located near Ely, Iowa, as well as a change to a first-adjacent channel. The area currently served by KQMG contains 36,000 persons within 2,516 square kilometers, but will remain well-served by KQMG(AM) as well as other aural reception services. See Technical Exhibit at 4 and Figures 5 and 6. The area that would be served by the proposed change in KQMG's channel and community of license to Solon contains 290,100 persons within 2,516 square kilometers (with no overlap with the current protected contour), id., which results in a net gain of service to 254,100 persons. Therefore, the proposed changes would result in a preferential arrangement of allotments, since the proposed change to serve Solon would fall under allotment priority (3),<sup>4</sup> a first local radio transmission service for Solon, and result in a net

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<sup>4</sup> The Commission's priorities when making a determination under Section 307(b), 47 U.S.C. § 307(b), are: (1) providing a first full-time aural service to a proposed community; (2) providing a second full-time aural service to a proposed community; (3) providing a first local service to a proposed community; and (4) other public interest matters. See FM Channel Policies/Procedures, 90 FCC 2d 88, 90-93, 51 RR 2d \_\_\_\_, (1982) and Alessandro Broadcasting Co., 99 FCC 2d 1, 56 RR 2d 1568 (Review Board, 1984)). Priorities (2) and (3) are given equal weight, id., and in such cases the Commission evaluates a proposed community's need for a second "competitive" service under priority (2) to another proposed community's need for a first local service under priority (3) based on other factors.

gain of service to 254,100 persons, whereas retaining KQMG's current community of license of Independence would fall under lower allotment priority (4), other public interest factors, since Independence would still be served by a local radio transmission service, by KQMG(AM), and the current service area of KQMG would remain well-served by other aural reception services.<sup>5</sup> KM hereby certifies that it will file the KQMG Application for the use of Channel 236A at Solon, and construct the facility of that application is granted.

6. **Downgrade of KGGO(FM) Des Moines, Iowa, to Class C0.** This Petition and the KQMG Application request the downgrade of station KGGO from a Class C to a Class C0 station, on its current Channel 235, to accommodate KQMG's proposed change in channel from Channel 237A to Channel 236A. See Technical Exhibit at 1 and 6. KGGO is currently licensed with an antenna height above average terrain ("HAAT") of only 325 meters, well below the minimum antenna HAAT of 451 meters required for Class C stations, and therefore KGGO is subject to reclassification to Class C0. See 47 C.F.R. §§ 73.211(a)(2) and (d); 73.3573 (Note 4). KM hereby certifies that no alternate channel is available for its proposed service on Channel 236A at Solon, Iowa at its specified site in compliance with the required minimum distance separation requirements,

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<sup>5</sup> Although Solon is not located within any urbanized area, the protected contour for the proposed Channel 236A facilities would encompass about 55% of the population and about 62% of the geographic area of the Cedar Rapids urbanized area, see Technical Exhibit at 4, therefore KM will submit an analysis as required under Faye and Richard Tuck, 3 FCC Rcd 5374, 65 RR 2d 402 (1988)("Tuck") and its progeny, demonstrating the independence of Solon from the Cedar Rapids urbanized area, as an exhibit to the KQMG Application. However, KM notes that even under allotment priority (4) the change of KQMG's community of license to Solon is still in the public interest, since Independence would still be served by KQMG(AM) and the arrangement of allotments proposed by this Petition and the KQMG Application also includes a new vacant allotment for Mineral Point, Wisconsin, as that community's first local radio transmission service under allotment priority (3).

see Technical Exhibit at 6, and that copies of the Petition and the KQMG Application will be served on the licensee of KGGO, as required by the Commission's rules. Id.

7. **Proposed Channel Change for KMAQ(FM), Maquoketa, Iowa.** This Petition and the KQMG Application also request a change in channel for station KMAQ from its current Channel 236A to Channel 237A at its current site, to accommodate the KQMG channel and community of license change, and KM requests that the Commission issue an order to show cause to the licensee of KMAQ regarding same. See Technical Exhibit at 1 and 7. KM hereby states that it agrees to reimburse KMAQ and its licensee, Maquoketa Broadcasting Company ("MBC"), for all of its reasonable expenses in changing channels in accordance with Commission precedent established in Circleville, Ohio, 8 FCC 2d 159 (1967) and similar cases.<sup>6</sup> KM will serve copies of the Petition and the KQMG Application on MBC, as an affected licensee, as required by the Commission's rules. KM requests that the Commission issue an order to MBC to show cause why KMAQ's channel should not be changed to Channel 237A at its current transmitter site.

8. **Proposed Channel Change for Asbury, Iowa, Vacant Allotment.** This Petition and the KQMG Application also request a change in channel for the vacant reserved Channel 238A allotment for Asbury, Iowa, from reserved Channel 238A at Asbury, Iowa to reserved Channel 254A at Asbury, Iowa, to accommodate the proposed channel change for KMAQ. See Technical Exhibit at 1 and 7. This proposed channel change also includes a slight change in the reference coordinates

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<sup>6</sup> Although this proposed change in channel for KMAQ is being filed as an involuntary change at this time, KM intends to contact MBC and attempt to negotiate a mutually agreeable channel change consent agreement; if successful, KM would file a copy of any such agreement with the Commission promptly. KM also notes that this Petition and the KQMG Application complies with the Commission's policies established in Columbus, Nebraska, 59 RR 2d 1185 (1986), with respect to the number of involuntary changes permitted in allotment change proceedings.

for the vacant Asbury allotment, to 42° 29' 23" north latitude and 90° 46' 56" west longitude; the required coverage over the principal community of Asbury may still be achieved at the proposed new allotment reference coordinates. Id. at 7.

9. **Proposed New Vacant Allotment for Mineral Point, Wisconsin.** An additional benefit of the changes proposed in this Petition and the KQMG Application is that the proposed channel change for the vacant reserved channel allotment for Asbury, Iowa, from Channel 238A to Channel 254A, permits the allocation of a new vacant channel allotment (i.e., a “drop-in” allotment) of Channel 238A for the proposed community of license of Mineral Point, Wisconsin, at reference coordinates of 42° 51' 36" north latitude and 90° 10' 47" west longitude for that community. See Technical Exhibit at 1 and 8. The community of Mineral Point is listed in the 2000 U.S. Census as a city with a population of 2,617 persons; therefore, Mineral Point is a “community” for allotment purposes. According to CDBS, no other radio or other broadcast station is licensed or allocated to Mineral Point; therefore, the proposed new vacant allotment proposes a first local radio transmission service for the community, under allotment priority (3). KM hereby certifies that if the proposed new allotment of Channel 238A to Mineral Point is made as requested herein, KM intends to apply for Commission authorization to construct the station (and indeed, is filing a Form 301 application for a construction permit for the proposed allotment and paying the required application filing fee simultaneous with the filing of this Petition, as required by recent changes in the Commission’s rules) and will file and qualify to bid for the construction permit at the Commission auction for same, and if successful in acquiring the permit to promptly construct the new facility.

10. Mineral Point is an independent community which merits its own first local radio transmission service; it is a historic city in Wisconsin, as the third city formed in Wisconsin (and

even the first temporary capital of the state), and the first city in Wisconsin listed on the National Register of Historic Places.<sup>7</sup> It has its own zip code (53565, which is only for Mineral Point) and post office; it is governed by elected officials (a mayor and a two-alderperson city council) as well as city clerk/treasurer, city attorney and a zoning administrator; municipal services including its own police department (with six full-time officers), its own water and sewer department, a city garage, a volunteer fire department and emergency rescue squad; and a community library. The city is served by a weekly newspaper (the *Mineral Point Democrat Tribune*). Recreational opportunities include two golf courses, at least five parks, fishing, bowling and a community swimming pool maintained by the city. Civic and cultural opportunities range from the oldest Masonic Temple lodge in Wisconsin, to the Mineral Point Theatre (or Opera House) used by a local film society, the Mineral Point Railroad Depot Museum and Society, about 20 artists and their galleries and the hosting of a “Gallery Night” four days a year and an annual Fall Art Tour, to the Shake Rag Alley Center for the Arts, to several civic service organizations (including Kiwanis, American Legion, VFW, 4-H, Boy Scouts and Girl Scouts). Mineral Point has two local schools (Mineral Point Elementary and Mineral Point Middle School-High School) and at least seven local churches of various denominations. The city has its own local chamber of commerce, and local businesses ranging from health care providers (doctors, dentists, a chiropractor, an optometrist, and a rehabilitation center), attorneys, automotive services, restaurants, banks, grocery stores, gift shops, about a dozen bed-and-breakfasts, and a wide variety of other businesses.

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<sup>7</sup> The facts regarding the City of Mineral Point presented herein generally were obtained from its official website, <http://www.mineralpoint.com>, or other sites linked thereto, unless otherwise cited.

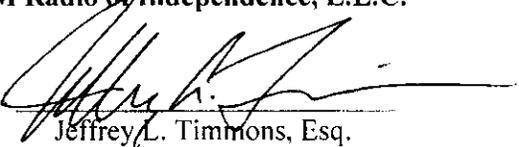
11. **Conclusion.** Grant of this Petition and the KQMG Application is in the public interest because it will provide a new first local radio transmission service to two communities (Solon, Iowa and Mineral Point, Wisconsin), and a net gain of 254,100 persons served by the change in channel and community of license for KQMG; therefore, the Commission should grant this Petition and the KQMG Application. In consideration of the foregoing, the Commission is respectfully requested to initiate a rule making proceeding to amend Section 73.202(b), the FM Table of Allotments, as follows:<sup>8</sup>

	<u>Present</u>	<u>Proposed</u>
Asbury, Iowa	*238A	*254A
Mineral Point, Wisconsin	- - - -	238A

Respectfully submitted,

**KM Radio of Independence, L.L.C.**

By

  
Jeffrey L. Timmons, Esq.  
Its Attorney

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January 19, 2007

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<sup>8</sup> KM notes that due to a recently adopted order, the FM Table of Allotments, Section 73.202(b), now only lists vacant FM allotments, and not FM allotments that are in use by existing stations (or "assigned"); therefore, this listing of the proposed changes to the FM Table of Allotments does not reflect the proposed changes to the channel or class of the existing stations involved in this Petition or the KQMG Application (so for KQMG, KGGO, or KMAQ).

TECHNICAL EXHIBIT  
APPLICATION FOR FM CONSTRUCTION PERMIT AND  
PETITION FOR RULE MAKING  
RADIO STATION KQMG-FM  
SOLON, IOWA

JANUARY 17, 2007

CH 236A    6 KW    100 M

TECHNICAL EXHIBIT  
APPLICATION FOR FM CONSTRUCTION PERMIT AND  
PETITION FOR RULE MAKING  
RADIO STATION KQMG-FM  
SOLON, IOWA  
CH 236A 6 KW 100 M

Table of Contents

	Technical Narrative
Figure 1	Map of Proposed Transmitter Site
Figure 2	Sketch of Antenna and Supporting Structure
Figure 3	Map of Predicted Coverage Contours
Figure 4	Solon, IA Allocation Study
Figure 5	Solon, IA Gain/Loss Map
Figure 6	Solon, IA Protected Services Map
Figure 7	Maquoketa, IA Allocation Study
Figure 8	Asbury, IA Allocation Study
Figure 9	Asbury, IA Community Coverage Map
Figure 10	Mineral Point, WI Allocation Study

TECHNICAL EXHIBIT  
APPLICATION FOR FM CONSTRUCTION PERMIT AND  
PETITION FOR RULE MAKING  
RADIO STATION KQMG-FM  
SOLON, IOWA  
CH 236A 6 KW 100 M

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application for radio station KQMG-FM licensed to Independence, Iowa to relocate its facility to serve a new community of license, Solon, Iowa.

Summary of Proposal

- Reallocate KQMG-FM on Channel 237A from Independence, Iowa to Channel 236A at Solon, Iowa
- Class C0 Trigger for KGGO(FM) on Channel 235 assigned to Des Moines, Iowa.
- Order-to-Show Cause for KMAQ-FM assigned to Maquoketa, Iowa from Channel 236A to Channel 237A
- Reallocate vacant allotment of Channel \*238A at Asbury, Iowa to Channel \*254A at Asbury, Iowa
- Allocate a new Channel 238A at Mineral Point, WI.

This is a hybrid type of filing, with the first three components being proposed in this herein Form 301 application and the last two components being proposed in a contingently filed herein Rule Making proposal.

## **KQMG-FM Component**

### Proposed Transmitter Location

A map showing the transmitter site location is provided in Figure 1. A sketch showing the proposed antenna and supporting structure is shown on Figure 2. An FAA *Determination of No Aeronautical Hazard* is in the process of being sought.

### Interference Concerns

The 115 dBu predicted "blanketing" contour of the proposed station would extend radially less than 1 kilometer from the transmitting site. No interference is expected. However, the applicant recognizes its responsibility to resolve complaints of interference, including blanketing and receiver-induced interference as required by Sections 73.315(b), 73.316(e) and 73.318.

### Coverage Contours

The predicted coverage contours for the proposed operation were calculated in accordance with the provisions of Section 73.313. In accordance with current FCC practice, the distances to the contours were calculated without consideration given to terrain roughness correction factors.

The average terrain elevations from 3 to 16 kilometers along eight radials evenly spaced at 45-degree intervals were obtained from a N.G.D.C. 30-second terrain database. The terrain elevations were then used in combination with the effective radiated power for determining the distances to coverage contours.

As can be calculated using the map, the FCC predicted 70 dBu coverage contour encompasses all of Solon, Iowa.

Allocation Study

Figure 4 is an allocation study for channel 236A at the proposed site. The figure contains a tabulation of actual and required separation distances from other pertinent stations and allotments. The proposed site meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations except toward KMAQ-FM on Channel 236A assigned to Maquoketa, Iowa.

As discussed below, it is proposed as an Order to Show Cause to reallocate KMAQ-FM to Channel 237A with no facility modification. Beyond KMAQ-FM, there are no other allocation issues.

Community of License Change - Section 307(b)

*1. Proposal*

It is proposed to reallocate Channel 237A from Independence, Iowa to Channel 236A at Solon, Iowa.

*2. City Populations and Local Service*

Independence city has a 2000 U.S. Census population of 6,014 persons. Independence would have one aural service remaining, KQMG(AM) on 1220 kHz. Solon city has a U.S. Census population of 1,177 persons and has no local FM or AM service. Thus, the proposal will result in first local aural transmission service.

*3. Urbanized Area Considerations*

Solon is not located within the Cedar Rapids Urbanized area. The proposed 70 dBu contour for the allotment reference coordinates will encompass 55% of the Cedar Rapids Urbanized population and 62% of its area. The existing Channel 237A at Independence 70 dBu contour does not encompass any urbanized area.

*4. 60 dBu Gain and Loss Areas and Available Aural Services*

The Channel 237A Independence loss area contains 36,000 persons over 2,516 square kilometers. The Channel 236A Solon gain area contains 290,100 persons over 2,516 square kilometers. Area was calculated using a root mean square algorithm.

*5. 70 dBu and 60 dBu Coverage*

The following tabulates the area and population within the 70 dBu and 60 dBu contours depicted in Figure 3.

Contour	Population (2000 Census)	Area (sq. km)
70 dBu	99,200	808
60 dBu	289,600	2,480

Contour locations calculated in accordance with the provisions of Section 73.313. Population calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids".

6. *Protected FM and AM Services Available*

It has been determined that there are at least 8 protected FM services available to Independence and at least 12 to Solon as shown in Figure 6.

Radiofrequency Electromagnetic Field Exposure Analysis

The proposed facility has been evaluated in terms of potential radiofrequency electromagnetic field exposure at ground level in accordance with OET Bulletin No. 65, *Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*.<sup>1</sup> The power density at the base of the tower was calculated using the appropriate procedure contained in Section 2, Supplement A, *Additional Information for Radio and Television Broadcast Stations*, of the Bulletin.

For the calculation, a combined horizontal and vertical polarized ERP of 12 kilowatts is employed with a radiation center of 78 meters above ground level. A downward relative field value of 0.5 was assumed. It is calculated that the power density will not exceed 0.02 mW/cm<sup>2</sup> at ground level. This is ten percent of the Commission's guideline value for an uncontrolled environment for a FM radio station.<sup>2</sup> There are no other known high-powered emitters in the nearby vicinity.

Access to the transmitting site will be restricted and appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of

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<sup>1</sup> OET Bulletin 65, Second Edition 97-01, August, 1997.

<sup>2</sup> The FCC maximum guideline for a FM broadcast station in an uncontrolled environment is 0.2 mW/cm<sup>2</sup>.

power if necessary, shall be taken to ensure that the human exposure to radiofrequency radiation will not exceed the FCC guidelines.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

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**KGGO (FM) Component**

In order to propose Channel 236A at Solon, it is necessary to trigger KGGO(FM) on Channel 235C at Des Moines as a Class C0 facility. KGGO(FM) is effectively licensed for Class C0 facilities with an antenna height above average terrain of 325 meters an effective radiated power of 100 kilowatts.

An allocation search was completed on all the non-reserved allotment channels at the proposed site, to determine if an alternate fully-spaced channel is available for KQMG-FM that would not require the Class C0 trigger of KGGO(FM). No channel was identified.

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**KMAQ-FM Maquoketa, IA Component**

In order to propose Channel 236A at Solon, it is necessary to reallocate Channel 236A at Maquoketa, Iowa to Channel 237A with no transmitter site change. Figure 7 is an allocation study for the proposed reallocation. As can be seen, the only short-spacing is to a vacant allotment on Channel 238A assigned to Asbury, Iowa. It is proposed to reallocate Asbury, Iowa to Channel 254A. Since there is no transmitter site modification to KMAQ-FM, there is no gain/loss area. Furthermore, coverage over its principal community will be maintained.

.....  
**Vacant Asbury, IA Allotment Component**

In order to propose Channel 237A at Maquoketa, it is necessary to reallocate the vacant Channel \*238A allotment at Asbury, Iowa to Channel \*254A. The proposed new allotment reference coordinates for Channel \*254A at Asbury, Iowa are:

42° 29' 23" North Latitude  
90° 46' 56" West Longitude

This is a slight site change to the reference allotment for Asbury. However, community coverage over the city of Asbury is still predicted from this allotment.

.....  
**Proposed Mineral Point, WI Allotment Component**

By Asbury migrating to Channel 254A, a new "drop-in" allotment on Channel 238A is possible at the city of Mineral Point, Wisconsin. The proposed new allotment reference coordinates for Channel 238A at Mineral Point, Wisconsin are:

42° 51' 36" North Latitude  
90° 10' 47" West Longitude

These coordinates are also the community reference point coordinates, so it is obvious that the principal community contour will encompass Mineral Point. The city has a population of 2,617 persons. Furthermore, there are no existing aural services assigned to Mineral Point.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
941.329.6000

January 17, 2007

Figure 1



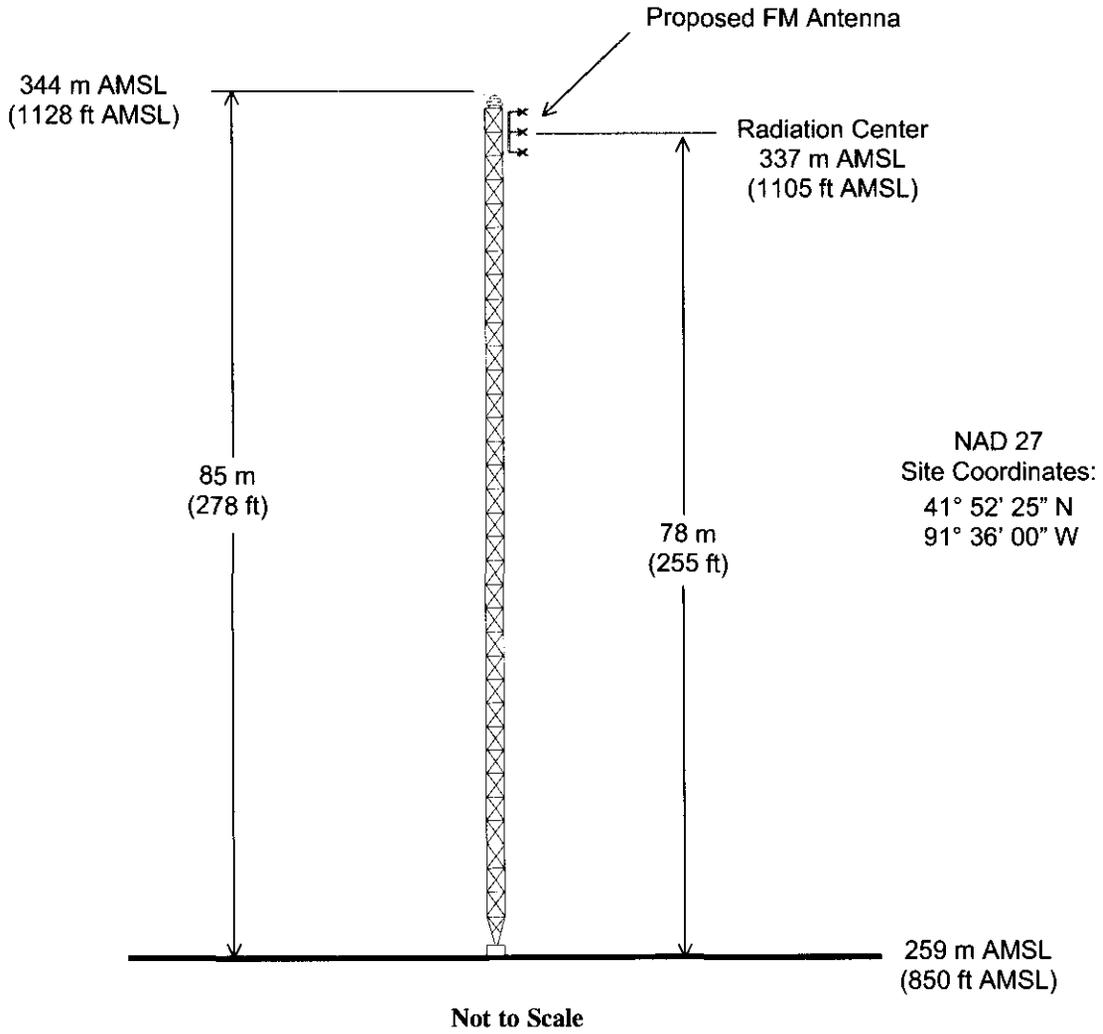
### **PROPOSED TRANSMITTER SITE**

**RADIO STATION KQMG-FM  
SOLON, IOWA  
CH 236A 6 KW 100 M**

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

Figure 2

ASRN: To Be Filed



**ANTENNA AND SUPPORTING STRUCTURE**

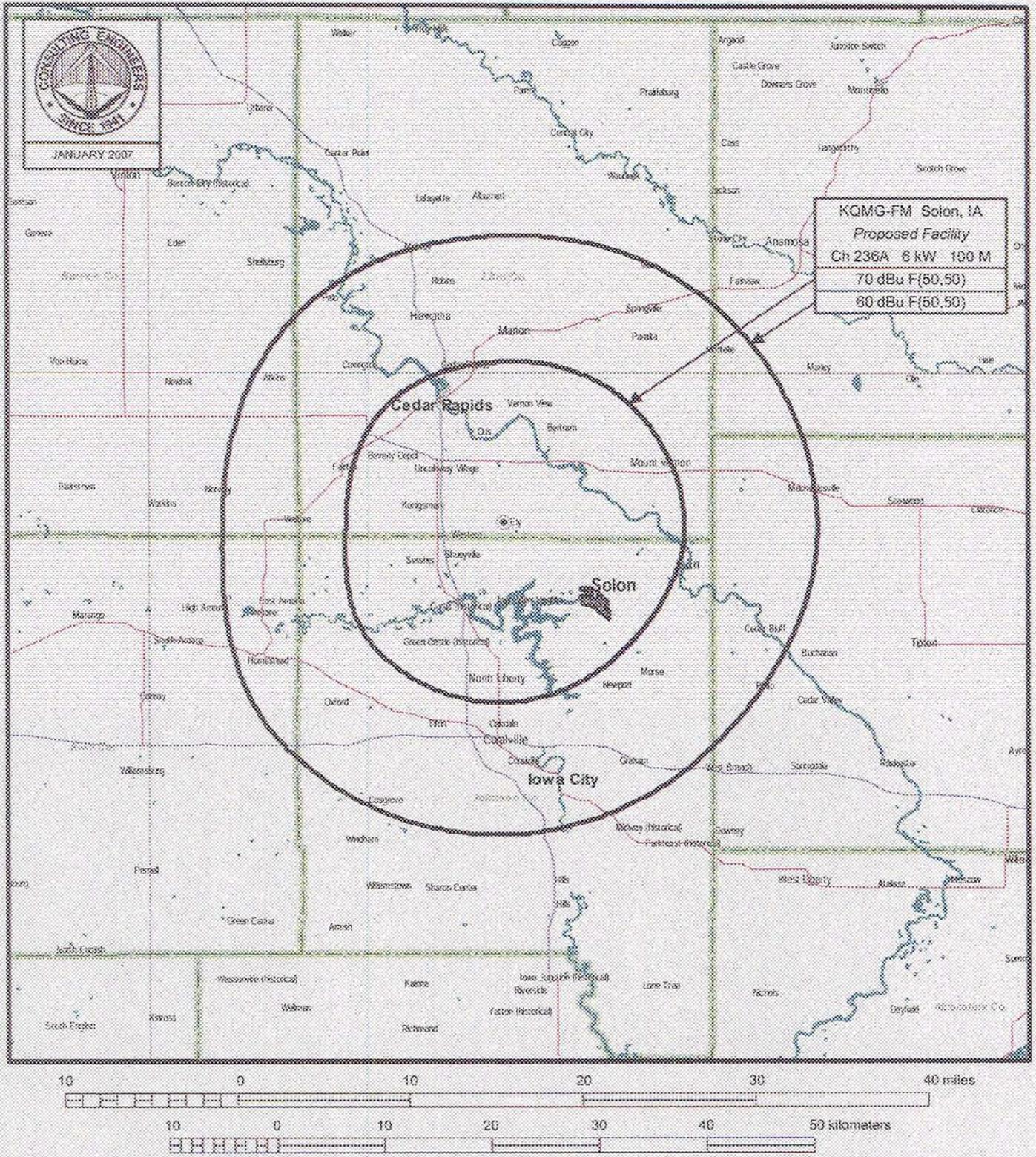
**RADIO STATION KQMG-FM**

**SOLON, IOWA**

**CH 236A 6 KW 100 M**

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

Figure 3



**FCC PREDICTED COVERAGE CONTOURS**

**RADIO STATION KQMG**

**SOLOM, IOWA**

**CH 236A 6 KW 100 M**

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

TECHNICAL EXHIBIT  
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 RADIO STATION KQMG-FM  
 SOLON, IOWA  
 CH 236A 6 KW 100 M

Channel 236A Solon, Iowa Allocation Study

41° 52' 25" North Latitude  
 91° 36' 00" West Longitude

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
KGGO	DES MOINES	BLH	235C	100	N	41-37-54	N	260.7	156.75	165.0
12965	IA LIC C	19840210AD	94.9	325		093-27-24				
<i>(Proposed C0 Trigger.)</i>										
KGGO	DES MOINES		235C0	100	N	41-37-54	N	260.7	156.75	152.0
12965	IA PROPOSED		94.9	325		093-27-24				
<i>(C0 Trigger.)</i>										
KMAQ-FM	MAQUOKETA	BLH	236A	6.000		42-05-26	N	73.0	84.03	115.0
39857	IA LIC C	19990316KC	95.1	100	30561	090-37-43				
<i>(Order to Show Cause to Channel 237A.)</i>										
KQMG-FM	INDEPENDENC	BLH	237A	2.900	N	42-28-32	N	341.5	70.59	72.0
42080	IA LIC C	19950605KB	95.3	125		091-52-26				
<i>(Applicant's existing facility.)</i>										
KQMG-FM	INDEPENDENC	BPH	237A	1.750	N	42-23-55	N	347.4	59.78	72.0
42080	IA APP C	20050906AAL	95.3	186		091-45-32				
<i>(Minor change application for applicant's existing facility, dismissal requested.)</i>										
KOKX-FM	KEOKUK	BLH	237C1	100		40-24-01	N	179.6	163.63	133.0
70573	IA LIC C	19990412KB	95.3	245		091-35-09				
NEW	ANAMOSA	BNPH	239A	6.000	N	42-08-19	N	21.3	31.62	31.0
162475	IA CP C	20050103AEJ	95.7	100		091-27-38				



TECHNICAL EXHIBIT  
APPLICATION FOR FM CONSTRUCTION PERMIT AND  
PETITION FOR RULE MAKING  
RADIO STATION KQMG-FM  
SOLON, IOWA  
CH 236A 6 KW 100 M

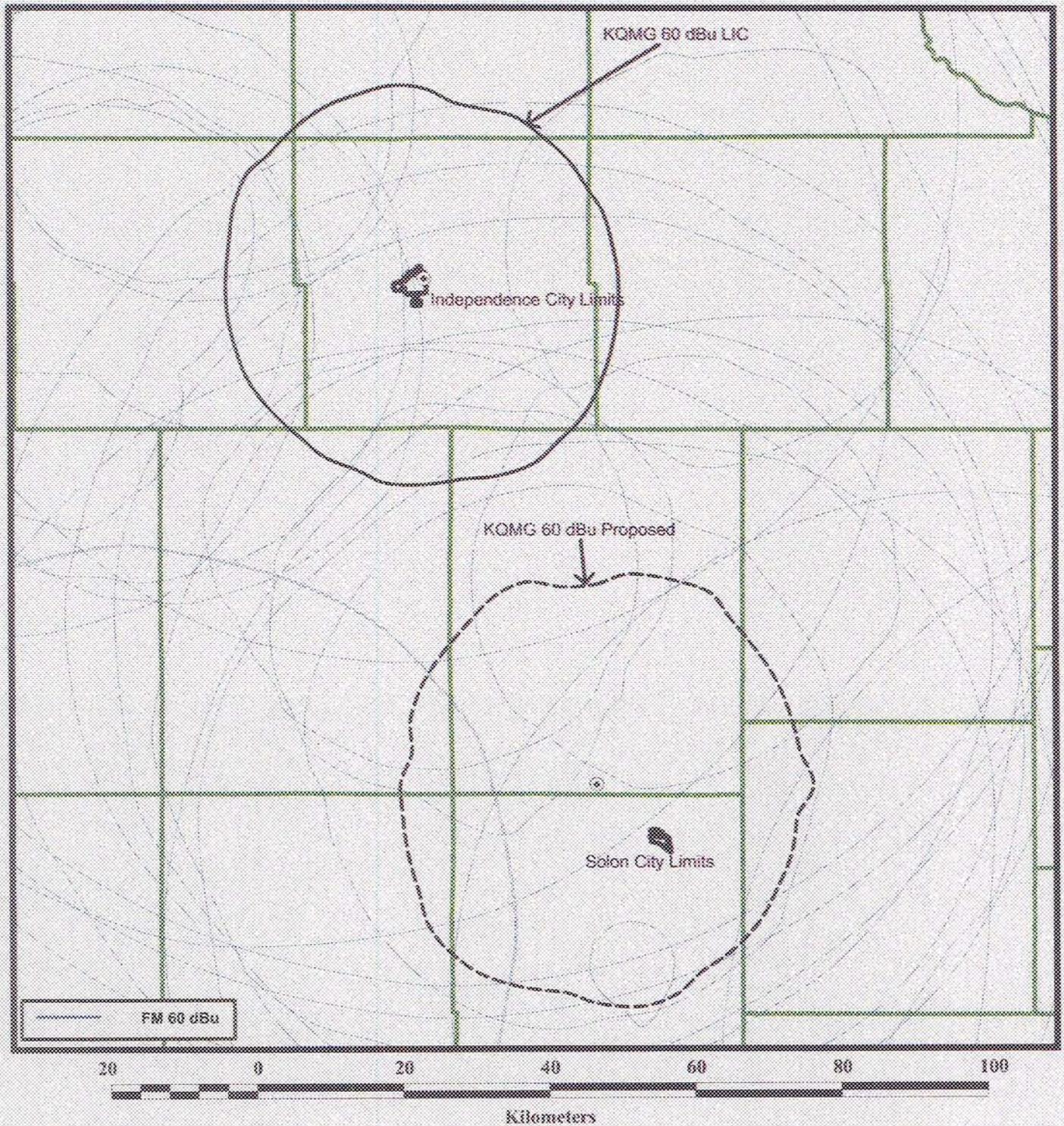
Tabulation of Other Stations Available to Gain - Loss Area

**AM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency (kHz)</u>
WSUI	IOWA CITY	IA	910
KCJJ	IOWA CITY	IA	1630

**FM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KSUI	IOWA CITY	IA	219
KCCK-F	CEDAR RAPIDS	IA	202
KHKE	CEDAR FALLS	IA	208
KUNI	CEDAR FALLS	IA	215
KRUI-F	IOWA CITY	IA	209
KQMG-F	INDEPENDENCE	IA	237
KDST	DYERSVILLE	IA	257
KMCH	MANCHESTER	IA	234
KFMW	WATERLOO	IA	300
WLLR-F	DAVENPORT	IA	279
KNWS-F	WATERLOO	IA	270
KKHQ-F	OELWEIN	IA	222
KOKZ	WATERLOO	IA	289
KXIA	MARSHALLTOWN	IA	266
KGRS	BURLINGTON	IA	297
KZIA	CEDAR RAPIDS	IA	275
KDAT	CEDAR RAPIDS	IA	283
KHAK	CEDAR RAPIDS	IA	251
WMT-FM	CEDAR RAPIDS	IA	243
KKRQ	IOWA CITY	IA	264
KMXG	CLINTON	IA	241
KCQQ	DAVENPORT	IA	293
KBEA-F	MUSCATINE	IA	259
KRNA	IOWA CITY	IA	231
KATF	DUBUQUE	IA	225
KSKB	BROOKLYN	IA	256
KOEL-F	CEDAR FALLS	IA	253
KCRR	GRUNDY CENTER	IA	249



OTHER FM PROTECTED SERVICES  
AVAILABLE TO SOLON & INDEPENDENCE

FM STATION KQMG  
SOLON, IOWA

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

**ENGINEERING EXHIBIT  
FM STATION KQMG**

Tabulation of Other Protected Stations Available

**FM CONTOURS**

<b><u>Call Sign</u></b>	<b><u>Community of License</u></b>	<b><u>State</u></b>	<b><u>Channel</u></b>
KSKB	BROOKLYN	IA	256
KCVM	HUDSON	IA	241
KZIA	CEDAR RAPIDS	IA	275
KDAT	CEDAR RAPIDS	IA	283
KOEL-FM	CEDAR FALLS	IA	253
KHAK	CEDAR RAPIDS	IA	251
KCRR	GRUNDY CENTER	IA	249
KCOO	DUNKERTON	IA	280
KFMW	WATERLOO	IA	300
KSUI	IOWA CITY	IA	219
KWOF-FM	HIAWATHA	IA	206
KSKB	BROOKLYN	IA	256
KBBG	WATERLOO	IA	201
KCCK-FM	CEDAR RAPIDS	IA	202
KHKE	CEDAR FALLS	IA	208
KUNI	CEDAR FALLS	IA	215
KWVI	WAVERLY	IA	205
KRUI-FM	IOWA CITY	IA	209
NEW	ANAMOSA	IA	239
WMT-FM	CEDAR RAPIDS	IA	243
KKRQ	IOWA CITY	IA	264
WLLR-FM	DAVENPORT	IA	279
KNWS-FM	WATERLOO	IA	270
KBEA-FM	MUSCATINE	IA	259
KKHQ-FM	OELWEIN	IA	222
KRNA	IOWA CITY	IA	231
KRQN	VINTON	IA	296
KOKZ	WATERLOO	IA	289
KMCH	MANCHESTER	IA	234

TECHNICAL EXHIBIT  
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 RADIO STATION KQMG-FM  
 SOLON, IOWA  
 CH 236A 6 KW 100 M

Channel 237A Maquoketa, IA Allocation Study

42° 05' 26" North Latitude  
 90° 37' 43" West Longitude

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
KMCN 33054	CLINTON IA	BLH LIC C	234A 19980909KD	3.0 100		41-54-34 090-13-28	N	121.0	39.06	31.0
KMAQ-FM 39857	MAQUOKETA IA	BLH LIC C	236A 19990316KC	6.0 100		42-05-26 090-37-43	N	93.6	0.00	49.0
<i>(Applicant's existing facility.)</i>										
KQMG-FM 42080	INDEPENDENC IA	BLH LIC C	237A 19950605KB	2.9 125	N	42-28-32 091-52-26	N	293.1	111.26	115.0
<i>(KQMG-FM is proposed to be reallocated from Channel 237A Independence, IA to Channel 236A Solon, Iowa.)</i>										
KQMG-FM 42080	SOLON IA	PROPOSED	236A 95.1	6.0 100	N	41-52-25 091-36-00	N	107.0	107.0	72.0
<i>(KQMG-FM is proposed to be reallocated from Channel 237A Independence, IA to Channel 236A Solon, Iowa.)</i>										
WRTB 59620	WINNEBAGO IL	BLH LIC C	237A 19850108LQ	1.25 156	N	42-17-26 089-09-51	N	79.1	122.99	115.0
KOKX-FM 70573	KEOKUK IA	BLH LIC C	237C1 19990412KB	100 245		40-24-01 091-35-09	N	203.4	204.15	200.0
	ASBURY IA	RM VAC C	238A 8924		N	42-30-18 090-40-46	N	354.8	46.23	72.0
<i>(Proposed to reallocate vacant Channel 238A allotment at Asbury to Channel 254A.)</i>										

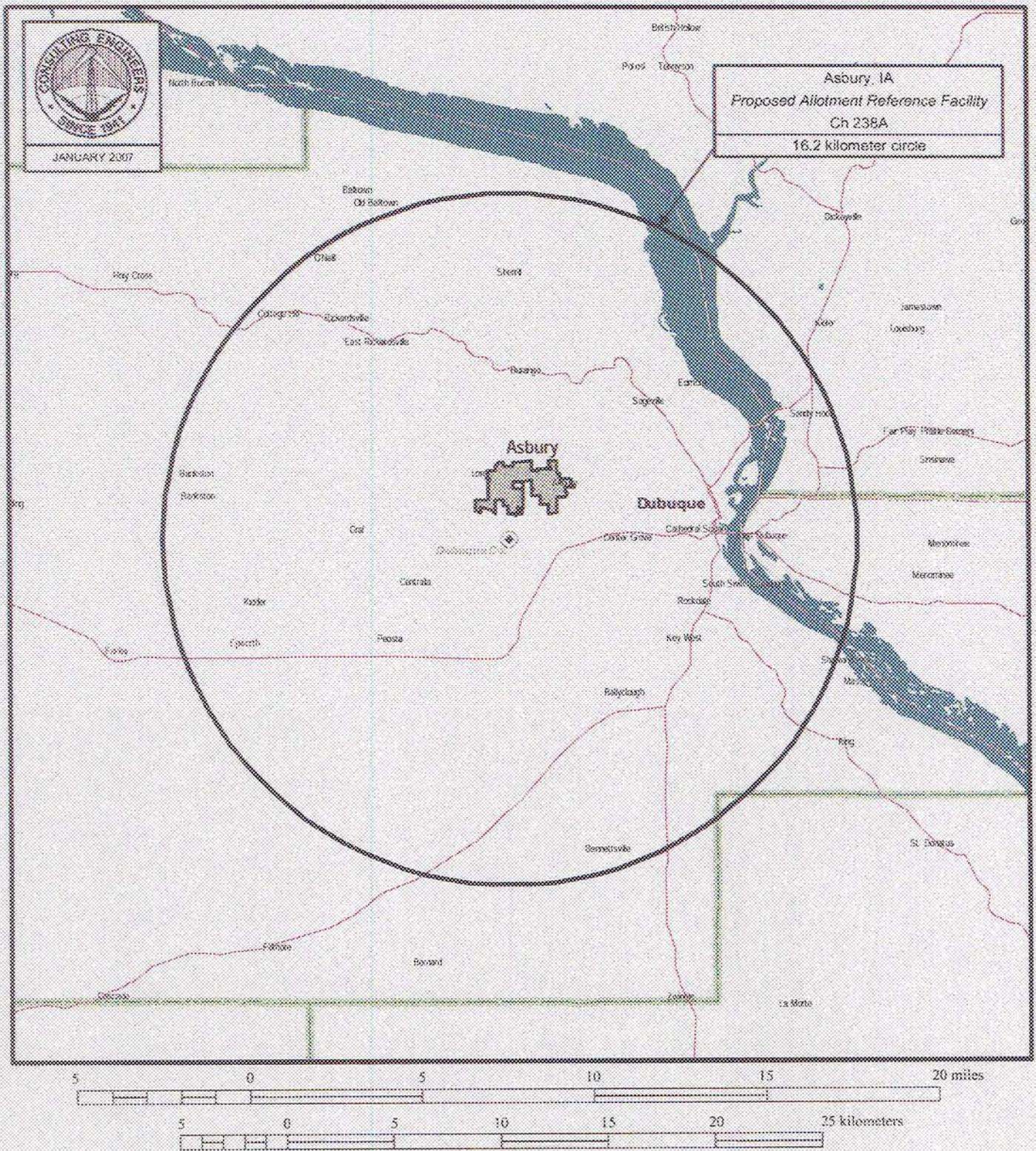
TECHNICAL EXHIBIT  
 APPLICATION FOR FM CONSTRUCTION PERMIT AND  
 PETITION FOR RULE MAKING  
 RADIO STATION KQMG-FM  
 SOLON, IOWA  
 CH 236A 6 KW 100 M

Vacant Channel 254A Asbury, IA Allocation Study

42° 29' 23" North Latitude  
 90° 46' 56" West Longitude

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
KHAK 54163	CEDAR RAPID IA	BLH LIC C 19790823AG	251C1 98.1	100 140	N	41-55-28 091-36-55	N	227.8	93.14	75.0
WXXQ 63137	FREEMPORT IL	BLH LIC C 19990125KF	253B1 98.5	11.0 150	N	42-16-48 089-19-59	N	100.6	121.59	96.0
KMGO 35126	CENTERVILLE IA	BPH CP C 20060315ADN	254C0 98.7	94.0 458	N	41-02-22 093-00-32	N	229.6	245.42	215.0
WLKU 8590	ROCK ISLAND IL	BPED CP C 20060428AIW	255B 98.9	39.0 281	N	41-19-39 090-22-46	N	165.4	133.34	113.0
WLKU 8590	ROCK ISLAND IL	BLED LIC C 20051208ADJ	255B 98.9	39.0 281	N	41-19-39 090-22-46	N	165.4	133.34	113.0
WVCX 73061	TOMAH WI	BMLD LIC C 20020128ABE	255C0 98.9	100.0 300	N	43-51-10 090-27-36	N	9.7	153.68	152.0
KDST 16778	DYERSVILLE IA	BLH LIC C 19840919DR	257A 99.3	3.0 91	N	42-25-43 091-12-50	N	259.3	36.15	31.0

Figure 9



**FCC PREDICTED COVERAGE CONTOURS**

RADIO STATION KQMG

OLON, IOWA

CH 236A 6 KW 100 M

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

TECHNICAL EXHIBIT  
 APPLICATION FOR FM CONSTRUCTION PERMIT AND  
 PETITION FOR RULE MAKING  
 RADIO STATION KQMG-FM  
 SOLON, IOWA  
 CH 236A 6 KW 100 M

Vacant Channel 238A Mineral Point, WI Allocation Study

42° 51' 36" North Latitude  
 90° 10' 47" West Longitude

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
WOLX-FM 60236	BARABOO WI	BLH LIC C	235B 4952	37.0 94.9	N	43-25-40 089-39-14	N	33.9	76.21	69.0
KMAQ-FM 39857	MAQUOKETA IA	PROPOSED	237A 95.1	6.0 100	30561	42-05-26 090-37-43	N	203.4	93.10	72.0
	ASBURY IA	RM VAC C	238A 8924	95.5		42-30-18 090-40-46	N	226.1	56.86	
<i>(Proposed to reallocate vacant Channel 238A allotment at Asbury to Channel 254A.)</i>										
WIFC 74102	WAUSAU WI	BLH LIC C	238C 20031021AEZ	100.0 95.5	N	44-55-14 089-41-28	N	9.5	232.29	226.0
WRQT 36208	LA CROSSE WI	BLH LIC C	239C2 19890213KF	50.0 95.7	N	43-37-58 091-17-06	N	314.2	124.21	106.0
KIYX 77326	SAGEVILLE IA	BMLH LIC C	291A 20020426AAX	4.2 106.1	N	42-41-27 090-37-26	N	242.7	40.92	10.0

**CERTIFICATE OF SERVICE**

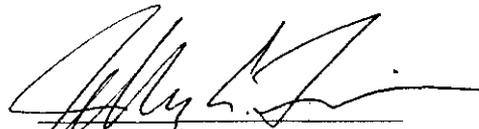
I, Jeffrey L. Timmons, hereby certify that on this 19<sup>th</sup> day of January, 2007, copies of the foregoing "Petition for Rule Making" have been served either by Federal Express and then hand delivery (\* denotes such delivery) or by United States first class or priority mail, postage prepaid and postmarked by the pleading filing date, upon the following:

Citadel Broadcasting Company  
7201 W. Lake Mead Boulevard, Suite 400  
Las Vegas, Nevada 89128 - 8366  
*Licensee of KGGO(FM) Des Moines IA*

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Leventhal Senter & Lerman PLLC  
2000 K Street, N.W., Suite 600  
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*Counsel to Citadel Broadcasting Company*

Maquoketa Broadcasting Company  
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Maquoketa, Iowa 52060  
*Licensee of KMAQ-FM Maquoketa IA*

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6900 Wisconsin Avenue, Suite 704  
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*Counsel to Maquoketa Broadcasting Company*

  
\_\_\_\_\_  
Jeffrey L. Timmons, Esq.