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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FILED/ACCEPTED

FEB 15 2007

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Portland, Maine))

MB Docket No. _____
RM- _____

To: The Secretary
Attn: Chief, Audio Division
Media Bureau

PETITION FOR RULEMAKING

Lisbon Communications, Inc. ("Lisbon"), the licensee of Station WJRT(FM), Royalton, Vermont (the "Station" or "WRJT"), by its counsel, hereby files this Petition for Rulemaking ("Petition") requesting that the Commission issue an Order to Show Cause to Citadel Broadcasting Company ("Citadel"), the licensee of Station WBLM(FM), Portland, Maine ("WBLM"), requiring Citadel to demonstrate why WBLM should not be downgraded from Channel 275C to Channel 275C0. The reclassification of WBLM from Class C to C0 would enable to Lisbon to upgrade WRJT's transmission facilities and improve its service to the public. In support thereof, Lisbon states as follows.

WBLM is licensed to operate on Channel 275C with 100 kW effective radiated power and an antenna height of 435 meters above average terrain. This HAAT falls 16 meters short of the 451 meter minimum established for Class C Stations in Section 73.211(a)2 of the

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*Commission's Rules.*¹ Pursuant to Commission policies, WBLM is therefore subject to reclassification as a Class C0 Station.²

As demonstrated in the Engineering Report attached hereto as **Exhibit A**,³ WRJT is short-spaced to WBLM's Class C operations. Currently, WRJT provides contour protection to WBLM utilizing a directional antenna. By comparison, WRJT would be fully-spaced to WBLM's Class C0 operations. Such full spacing would allow WRJT to dispense with its contour protection of WBLM and to utilize a nondirectional antenna, leading to service gains of 7,993 persons in an area of 417 square kilometers. The improvements to WRJT's service facilitated by reclassification of WBLM are clearly in the public interest.⁴

Accordingly, Lisbon requests that the Commission issue an Order to Show Cause requiring Citadel to demonstrate why WBLM should not be reclassified as a Class C0 Station. Pursuant to the Commission's reclassification policies, Lisbon hereby confirms that there are no alternate, fully-spaced channels available for WRJT's proposed operation.⁵ Further, if this Petition is granted, Lisbon will file an application requesting the changes proposed herein and construct such facilities upon grant of the application.

¹ See 47 C.F.R. § 73.211(a)(2).

² See *1998 Biennial Regulatory Review – Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules*, 15 FCC Rcd 21649, 21657 (2000). See also 47 C.F.R. § 73.3573, n. 4.

³ Engineering Report in Support of Petition to Reclassify Class C FM Station WBLM ("Engineering Report"), prepared by Fred W. Volken, Consulting Engineer.

⁴ See *id.*

⁵ See *id.*

WHEREFORE, for the foregoing reasons, Lisbon Communications, Inc. respectfully requests that the Commission grant this Petition for Rulemaking and issue an Order to Show Cause to Citadel Broadcasting Company requiring Citadel to demonstrate why Station WBLM(FM), Portland, Maine should not be reclassified from Class C to Class C0.

Respectfully submitted,

LISBON COMMUNICATIONS, INC.

By: 

Barry A. Friedman, Esq.
Thompson Hine LLP
1920 N Street, N.W.
Suite 800
Washington, D.C. 20036
(202) 331-8800

February 15, 2007

EXHIBIT A

Engineering Report in Support of Petition
to Reclassify Class C FM Station WBLM

Introduction

This Engineering Report has been prepared for Lisbon Communications, Inc., licensee of FM station WRJT, Royalton, Vermont. WRJT(FM) is licensed in File Number BLH-19960731KA as a Class A station on Channel 276 with 1.35 kW power and antenna height of 208 meters above average terrain, employing a directional antenna. The Report is to be submitted to the Federal Communications Commission in support of a petition to reclassify the channel allotment for WBLM(FM), Portland, Maine, from Channel 275C to Channel 275C0 under Section 73.3573 of the Commission's Rules, in order to permit improvement of the transmitting facilities of WRJT(FM).

The licensed operation of WRJT(FM) is short-spaced to WBLM(FM) under Section 73.207 of the Rules, and WRJT(FM) provides contour protection to WBLM(FM) under Section 73.215 of the Rules. The required contour protection results in a significant reduction in radiation from WRJT(FM) toward populated areas. 1

The Report shows that the transmitting facilities of WBLM(FM) do not meet the minimum requirements of Section 73.211 of the Rules for a Class C station; that there is no other precluded channel available for WRJT(FM) that is fully spaced under Section 73.207 of the Rules; and that modifications resulting in substantial improvement in the service of WRJT(FM) would be permitted if WBLM(FM) is reclassified as a Class C0 station.

WBLM(FM) Transmitting Facilities

Station WBLM(FM) is licensed in File Number BLH-20030224ABB to operate on Channel 275C with 100 kW effective radiated power and antenna height of 435 meters above average terrain. The station's transmitting facilities do not conform with the minimum requirements of Section 73.211(a)(2) of the Commission's Rules for a Class C station, because the antenna height above average terrain is less than 451 meters. As a result, WBLM(FM) is subject to reclassification as a Class C0 station under Note 4 to Section 73.3573 of the Rules.

1 WRJT(FM) holds a construction permit, File Number BPH-20040526AHR, for operation on Channel 276A at a different transmitter site. Although the information presented in this Report is based upon the licensed operation of WRJT(FM), the situation with respect to reclassification of WBLM(FM) would be similar for the facilities authorized in the construction permit.

Channel Allotment for Licensed Operation of WRJT(FM)

A detailed allocation study for the licensed operation of WRJT(FM) shows that the station's transmitter site conforms with the distance separation requirements of Section 73.207 of the Commission's Rules for a Class A station, with the three exceptions that are discussed in the following paragraphs.

Table A of this Report provides the distance from the licensed transmitter site of WRJT(FM) to each existing station, construction permit, pending application, allotment and rulemaking petition within 300 kilometers for Channel 276 and the first adjacent channels; within 150 kilometers for the second and third adjacent channels; and within 50 kilometers for the frequencies removed by 53 and 54 channels from Channel 276.

As shown in Table A, the licensed operation of WRJT(FM) is short-spaced to WBLM(FM) on Channel 275C. The distance between the licensed operation of WRJT(FM) and WBLM(FM) is 154 kilometers; the required distance separation under Section 73.207 of the Rules is 165 kilometers. WRJT(FM) presently provides contour protection to WBLM(FM) under Section 73.215 of the Rules, utilizing a directional antenna. The 60 dBu contour for the licensed operation of WRJT(FM), employing a directional antenna, is depicted in Figure 1 of this Report.

WRJT(FM) is also short-spaced to both the licensed operation of WWMP(FM), Waterbury, Vermont, on Channel 277C3 and the authorized operation of WWMP(FM) on Channel 277C2. WRJT(FM) receives contour protection under Section 73.215 of the Rules from both the licensed and authorized operation of WWMP(FM).

From additional detailed allocation studies, this engineer has concluded that at the station's licensed transmitter site, there is no other precluded channel available for the operation of WRJT(FM) as a Class A station that would be fully spaced under Section 73.207 of the Commission's Rules.

Projected Modification of WRJT(FM) Licensed Facilities With WBLM(FM) Reclassified as Class C0 Station

Further reference to Table A of this Report shows that if WBLM(FM) is reclassified as a Class C0 station, the required spacing between the licensed operation of WRJT(FM) and WBLM(FM) is 152 kilometers. Under these circumstances, the licensed operation of WRJT(FM) would be fully spaced to WBLM(FM). WRJT(FM) then would no longer need to provide contour protection to WBLM(FM) and could operate with a nondirectional antenna. However, the projected nondirectional operation of WRJT(FM) would remain authorized under Section 73.215 of the Commission's Rules to avoid overlap of contours with WWMP(FM).

Figure 1 of this Report also depicts the 60 dBu contour for the projected operation of WRJT(FM) at the station's licensed transmitter site, for operation on Channel 276A with 1.35 kW effective radiated power and antenna height of 208 meters above average terrain, employing a nondirectional antenna. The projected operation of WRJT(FM) would result in increased coverage to the east, northeast and southeast.

The 60 dBu contour for the licensed operation of WRJT(FM) includes 69,038 persons in an area of 2,044 square kilometers. For the projected operation of WRJT(FM) with a nondirectional antenna, the 60 dBu contour would encompass an area of 2,461 square kilometers with a population of 77,031 persons

Reclassification of WBLM(FM) as a Class C0 station would therefore permit a substantial increase in the service area of WRJT(FM). The projected operation of WRJT(FM) would result in a gain of 7,993 persons in an area of 417 square kilometers, representing an 11.6 percent increase in the population and a 20.4 percent increase in the area presently receiving service from the station. There would be no loss of service from the projected operation of WRJT(FM).

Methods Employed in Determining Contours and Areas and Populations

Contours shown in this Report were determined from computerized calculations based on the NGDC 30-second terrain database, and Figure 1 of Section 73.333 of the Commission's Rules. Distances to contours were calculated at azimuthal increments of five degrees.

The population figures provided in this Report were determined by computerized calculations using block level data from the 2000 U.S. Census. Areas shown in the Report were also determined from computerized calculations.

Fred W Volken
Engineering Consultant

February 2007

Sierra Madre, California

Statement of Engineer

FRED W. VOLKEN, whose place of business is located at 348 W. Sierra Madre Blvd., Sierra Madre, California, hereby states that he is a graduate physicist holding the degree Bachelor of Arts from Occidental College, Los Angeles, California; that his qualifications as an engineering consultant are a matter of record with the Federal Communications Commission; that he has prepared, or supervised the preparation of, this document as engineering consultant for Lisbon Communications, Inc., licensee of FM Broadcast Station WRJT, Royalton, Vermont; and that all of the information contained in this document is accurate and correct to the best of his knowledge and ability.

I state under penalty of perjury that the foregoing is true and correct. Executed on February 12, 2007.

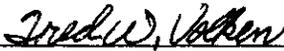

Fred W. Volken

TABLE A

Distance Separations from
WRJT(FM) Licensed Transmitter Site

Geographical coordinates of WRJT(FM) licensed transmitter site:

North Latitude 43° 46' 28"

West Longitude 72° 23' 55"

Channel and Class	Station and Location, Status, File Number	Geographical Coordinates	Distance from Reference (kilometers)	Required Separation (kilometers)
222A	WGXL(FM), Hanover, NH License BMLH-19930604KD	N 43° 39' 17" W 72° 17' 41"	16	10
274B	WEQX(FM), Manchester, VT License BLH-19850426KD	N 43° 09' 58" W 73° 06' 59"	89	69
275A	WCLX(FM), Westport, NY License BLH-20040412AAO	N 44° 13' 14" W 73° 24' 35"	95	72
275C	WBLM(FM), Portland, ME License BLH-20030224ABB	N 43° 55' 29" W 70° 29' 29"	154 /1	165
275C0	WBLM(FM), Portland, ME Proposed reclassification /2	N 43° 55' 29" W 70° 29' 29"	154	152
275C3	WNCQ-FM, Canton, NY Application BPH-20061204AJH	N 44° 32' 01" W 75° 05' 50"	232	89
275C3	WNCQ-FM, Canton, NY License BLH-20040824AGK	N 44° 32' 10" W 75° 05' 46"	232	89
275C3	WNCQ-FM, Canton, NY Construction permit BMPH-20051230AFG	N 44° 32' 10" W 75° 05' 46"	232	89
275B	WDRC-FM, Hartford, CT License BLH-19791106AH	N 41° 33' 44" W 72° 50' 40"	248	113
275A	WPXC(FM), Hyannis, MA License BLH-20030709ABD	N 41° 41' 20" W 70° 20' 49"	286	72
275B1	WPXC(FM), Hyannis, MA Application BPH-20010413AAI	N 41° 35' 30" W 70° 24' 41"	292	96
276A	WHRL(FM), Albany, NY License BMLH-19970402KE	N 42° 39' 46" W 73° 40' 37"	161	115

TABLE A (continued)
 Distance Separations from
 WRJT(FM) Licensed Transmitter Site

Channel and Class	Station and Location, Status, File Number	Geographical Coordinates	Distance from Reference (kilometers)	Required Separation (kilometers)
276A	Valleyfield, Quebec Allotment	N 45° 16' 08" W 74° 05' 50"	214	151
276A	Joliette, Quebec Rulemaking	N 46° 01' 00" W 73° 26' 00"	262	151
276A	WZOZ(FM), Oneonta, NY License BLH-5655	N 42° 25' 28" W 75° 04' 36"	265	115
276A	WTOJ(FM), Carthage, NY License BLH-20001115AAK	N 43° 57' 15" W 75° 43' 45"	268	115
276A	Louiseville, Quebec Allotment	N 46° 16' 00" W 72° 57' 00"	280	151
276A	Louiseville, Quebec Rulemaking	N 46° 18' 49" W 72° 56' 11"	285	151
276A	WGNY-FM, Newburgh, NY License BLH-19971219KE	N 41° 28' 25" W 74° 08' 22"	293	115
276A	WDME-FM, Dover-Foxcroft, ME License BLH-19910307KD	N 45° 12' 58" W 69° 14' 34"	298	115
277C3	WWMP(FM), Waterbury, VT License BLH-20030103ABX	N 44° 21' 52" W 72° 55' 53"	78 <u>1/3</u>	89
277C2	WWMP(FM), Waterbury, VT Construction permit BPH-20040526AFD	N 44° 31' 32" W 72° 48' 54"	90 <u>1/3</u>	106
277B	WODS(FM), Boston, MA License BMLH-19990126KA	N 42° 18' 27" W 71° 13' 27"	189	113
277A	Longueuil, Quebec Allotment	N 45° 33' 34" W 73° 33' 09"	218	98
277A	WQQQ(FM), Sharon, MA License BMLH-20030428AAA	N 41° 55' 08" W 73° 34' 22"	227	72

TABLE A (continued)

Distance Separations from
WRJT(FM) Licensed Transmitter Site

Channel and Class	Station and Location, Status, File Number	Geographical Coordinates	Distance from Reference (kilometers)	Required Separation (kilometers)
277B	Thetford-Mines, Quebec Rulemaking	N 46° 03' 28" W 71° 36' 06"	261	137
277B	WMCM(FM), Rockland, ME License BLH-20011121AAR	N 44° 07' 35" W 69° 08' 18"	265	113
277A	St.-Georges-de-Beauce, Quebec Rulemaking	N 46° 09' 32" W 70° 44' 52"	295	98
279B	WKNE(FM), Keene, NH License BLH-19921231KD	N 43° 02' 00" W 72° 22' 04"	82	69
279C	WPKQ(FM), North Conway, NH License BLH-20000622AEM	N 44° 16' 14" W 71° 18' 15"	104	95

- /1 WRJT(FM) presently provides contour protection to WBLM(FM) under Section 73.215 of the Commission's Rules.
- /2 Reclassification as requested in this Report.
- /3 WWMP(FM) provides contour protection to WRJT(FM) under Section 73.215 of the Commission's Rules.

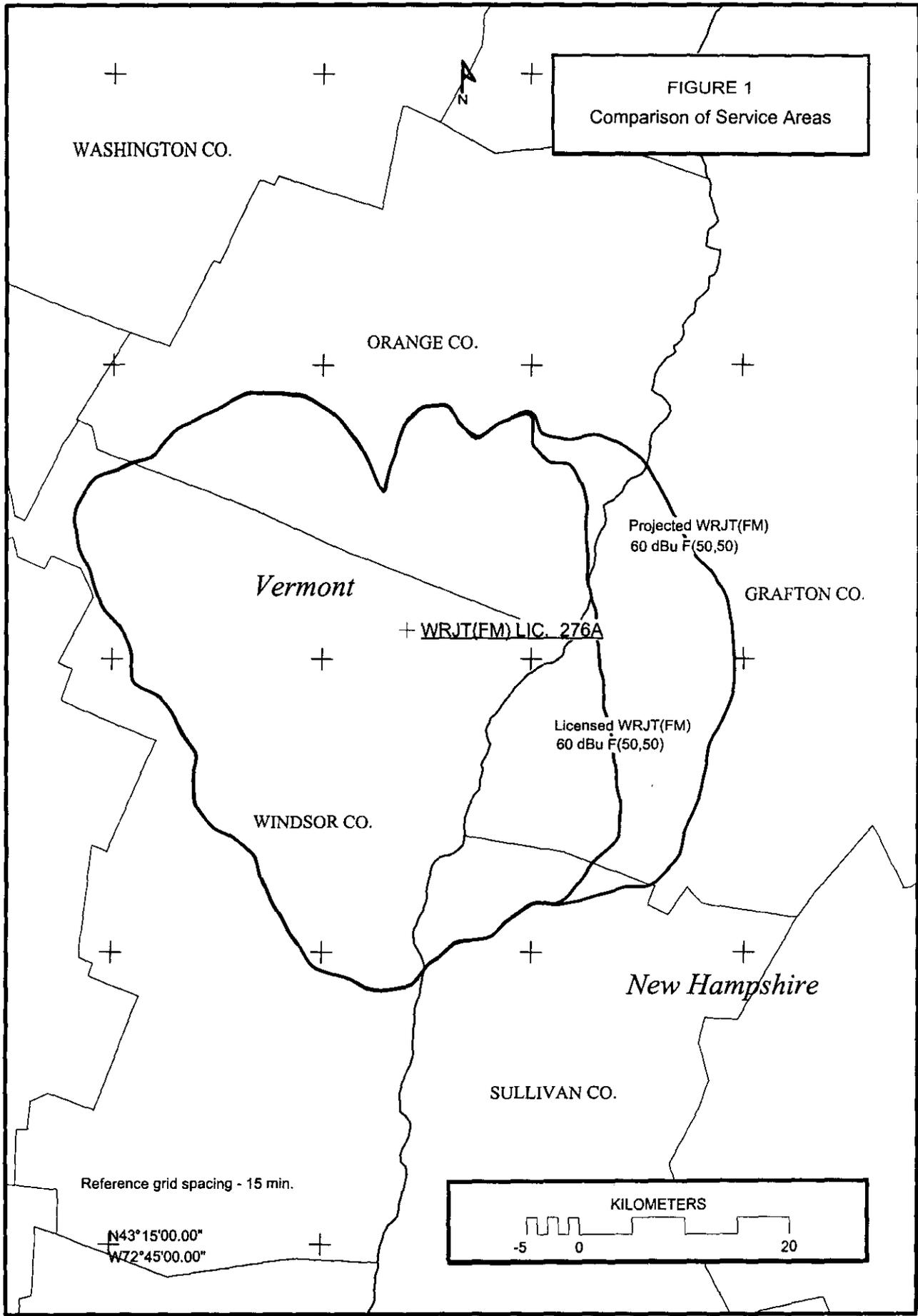


FIGURE 1
Comparison of Service Areas

WASHINGTON CO.

ORANGE CO.

GRAFTON CO.

Vermont

+ WRJT(FM) LIC. 276A

Licensed WRJT(FM)
60 dBu F(50,50)

WINDSOR CO.

New Hampshire

SULLIVAN CO.

Reference grid spacing - 15 min.

N43°15'00.00"
W72°45'00.00"

