

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b)) RM-_____
Table of Allotments)
FM Broadcast Stations)
(Ehrenberg and First Mesa, Arizona))
)

FILED/ACCEPTED
SEP 15 2008
Federal Communications Commission
Office of the Secretary

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

PETITION FOR RULEMAKING

Univision Radio License Corporation ("Univision"), licensee of KHOV-FM, Channel 287C2, Wickenburg, AZ, by the undersigned attorneys, hereby requests that the Commission initiate a rulemaking proceeding to amend the FM Table of Allotments as follows:

	<u>Current</u>	<u>Proposed</u>
Ehrenberg, Arizona	286C2	228C2
First Mesa, Arizona	247C	281C

These amendments will permit KHOV-FM to pursue an upgrade from its current Channel 287C2 to Channel 286C0. The proposed channel upgrade will result in a substantial increase in KHOV-FM's service area, resulting in the provision of service to an additional 1,315,327 people. As set forth in the attached engineering materials at Exhibit 1, the instant proposal can be accomplished while meeting the minimum distance separation requirements of §73.202(b) towards all authorizations, proposals, and reserved uses with the exception of the unused Vacant Allotment on Channel 286C2 at Ehrenberg, AZ.

In order for Channel 286C0 to be allotted at Wickenburg, AZ, Channel 286C2, assigned as a Vacant Allotment at Ehrenberg, AZ, must be substituted with Channel 228C2 at its

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current reference coordinates. As set forth in the attached engineering materials at Exhibit 2, Channel 228C2 at Ehrenberg meets minimum distance separation requirements.

Additionally, Channel 286C2 assigned to KFLX(FM), Kachina Village, AZ, must be substituted with Channel 246C2 at its current antenna site. Consequently, Univision respectfully requests that the Commission issue an Order to Show Cause to Grenax Broadcasting II LLC ("Grenax"), licensee of KFLX(FM), as to why its licensed channel should not be substituted with Channel 246C2 at its current site. Univision hereby states that, should this petition be granted, it will reimburse Grenax for its reasonable expenses in changing its channel in accordance with *Circleville, Ohio*, 8 FCC 2d 159 (1967).

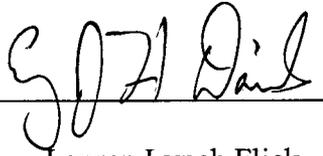
As demonstrated in the attached engineering materials at Exhibit 3, channel 246C2 at the KFLX(FM) site would be short-spaced to the Vacant Allotment at First Mesa, Arizona, currently assigned Channel 247C. Therefore, in order for Channel 246C2 to be allotted at Kachina Village, AZ, for KFLX(FM)'s use, Channel 247C, the Vacant allotment at First Mesa, AZ, must be substituted with Channel 281C at its current reference coordinates. As set forth in the attached engineering materials at Exhibit 4, Channel 281C at First Mesa meets minimum distance separation requirements.

Provided that Channel 286C0 is allotted to KHOV-FM, Univision will pursue its concurrently filed FCC Form 301 application, and if awarded the construction permit, will promptly initiate service at the requested facility. Consistent with the Commission's new allotment procedures in the *FM Allotment R&O*, Univision is filing this date an FCC Form 301 application for Channel 286C0 at Wickenburg, Arizona.

For the foregoing reasons, Univision respectfully requests that the Commission adopt the proposed changes to the FM Table of Allotments.

Respectfully submitted,

Univision Radio License Corporation

By: 

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Its Attorneys

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Dated: September 15, 2008

Exhibit 1

Community	Present	Proposed
Wickenburg, AZ	287C2	286C0
Ehrenberg, AZ	286C2	228C2
First Mesa, AZ	247C	281C
Kachina Village, AZ	286C2	246C2*

Petitioner requests show cause why the KFLX license should not be modified to 246C2 at the presently licensed site.

ComStudy 2.2 search of channel 286 (105.1 MHz Class C0) at 34-04-17.7 N, 112-47-55.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE	NOTE
	EHRENBERG	AZ	286	C2	143.85	239.00	258.3	-95.1	1
	EHRENBERG	AZ	286	C2	143.85	239.00	258.3	-95.1	1
	KACHINA VILLAGE	AZ	286	C2	154.72	239.00	49.5	-84.3	2
	MESA	AZ	284	C0	106.66	96.00	140.0	10.7	
	WICKENBURG	AZ	286	C2	14.01	239.00	17.1	-225.0	3
	WICKENBURG	AZ	287	C2	14.01	176.00	17.1	-162.0	3
	NEEDLES	CA	287	B1	186.49	180.00	297.4	6.5	
KFLX	KACHINA VILLAGE	AZ	286	C2	170.16	239.00	39.9	-68.8	1
KFLX	KACHINA VILLAGE	AZ	286	C2	154.72	239.00	49.5	-84.3	1
KHOV-FM	WICKENBURG	AZ	287	C2	18.35	176.00	349.0	-157.7	3
KHOV-FM	WICKENBURG	AZ	287	C2	14.01	176.00	17.1	-162.0	3
KHOV-FM1	CONSTELLATION	AZ	287	D	32.49	0.00	113.5	32.5	
KLVA	MARICOPA	AZ	288	C3	107.42	87.00	148.9	20.4	
KVRD-FM	COTTONWOOD	AZ	289	C3	92.71	87.00	42.2	5.7	
KVRD-FM	COTTONWOOD	AZ	289	C3	92.69	87.00	42.3	5.7	
KZZP	MESA	AZ	284	C	106.66	105.00	140.0	1.7	
KZZP	MESA	AZ	284	C	106.66	105.00	140.0	1.7	
NEW	NEEDLES	CA	287	B1	186.49	180.00	297.4	6.5	
NEW	NEEDLES	CA	287	B1	187.07	180.00	297.8	7.1	

- 1 Proposed modification of FM Table of allotments to substitute 228C2 at Ehrenberg
- 2 Petitioner request order for show cause to modify license of KFLX to specify 246C2 at the current site. See spacing study for KFLX at Channel 246C2
- 3 KHOV-FM Wickenburg, facility being studied.

Exhibit 2

ComStudy 2.2 search of channel 228 (93.5 MHz Class C2) at 33-37-49.1N, 114-17-34.1 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE	Note
	EHRENBERG	AZ	228	C2	18.99	190.00	352.4	-171.0	1
	PAULDEN	AZ	228	C3	211.46	177.00	48.8	34.5	
	PAULDEN	AZ	228	C3	211.46	177.00	48.8	34.5	
	WICKENBURG	AZ	229	C3	131.25	117.00	76.5	14.3	
971002ME	PARKER	AZ	230	C3	57.27	56.00	0.6	1.3	
KCLB-FM	COACHELLA	CA	229	B	180.03	169.00	276.6	11.0	
KCLB-FM	COACHELLA	CA	229	B	179.76	169.00	276.4	10.8	
KCLB-FM	COACHELLA	CA	229	B	180.03	169.00	276.6	11.0	
KCLB-FM	COACHELLA	CA	229	B	181.18	169.00	279.0	12.2	
KDKB	MESA	AZ	227	C	210.11	188.00	98.4	22.1	
KDKB	MESA	AZ	227	C	210.11	188.00	98.4	22.1	
KLJZ	YUMA	AZ	226	C1	113.57	79.00	197.1	34.6	
KLJZ*	YUMA	AZ	226	C1	113.54	79.00	197.1	34.5	
KRIT	PARKER	AZ	230	C3	56.72	56.00	359.6	0.7	
NEW	QUARTZ SITE	AZ	281	D	6.29	0.00	324.1	6.3	
NEW	BLYTHE	CA	227	D	25.01	0.00	302.2	25.0	
NEW	BLYTHE	CA	231	D	32.56	0.00	264.9	32.6	

1 Facility studied. Coordinates are from Petition for Rulemaking FM11427

Exhibit 3

Channel 246C2 at KFLX license site.

ComStudy 2.2 search of channel 246 (97.1 MHz Class C2) at 34-58-06.0 N, 111-30-29.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE	Note
	FIRST MESA	AZ	247	C	131.13	188.00	52.2	-56.9	1
	FIRST MESA	AZ	247	C	131.04	188.00	52.2	-57.0	1
	FIRST MESA	AZ	247	C	131.13	188.00	52.2	-56.9	1
	FIRST MESA	AZ	247	C	131.13	188.00	52.2	-56.9	1
	KACHINA VILLAGE	AZ	246	C2	0.00	190.00	90.0	-190.0	2
KMVA	DEWEY-HUMBOLDT	AZ	248	C	113.29	105.00	224.2	8.3	
KMVA*	DEWEY-HUMBOLDT	AZ	248	C	111.84	105.00	224.3	6.8	
KMXP	PHOENIX	AZ	245	C	188.28	188.00	195.8	0.3	
KMXP	PHOENIX	AZ	245	C	188.28	188.00	195.8	0.3	
KWMX	WILLIAMS	AZ	244	C2	67.24	58.00	297.3	9.2	
KWMX	WILLIAMS	AZ	244	C2	59.91	58.00	287.8	1.9	
KWMX-FM1	FLAGSTAFF	AZ	244	D	31.29	0.00	345.1	31.3	
KWMX-FM2	SEDONA	AZ	244	D	28.24	0.00	243.1	28.2	
NEW	FLAGSTAFF	AZ	300	D	31.81	0.00	343.0	31.8	

1 Petitioner proposes modification of table of FM table of allotments to substitute Ch. 281C at First Mesa for Ch 247C

2 Facility studied.

Exhibit 4

ComStudy 2.2 search of channel 281104.1 MHz Class C) at 35-41-09.0N, 110-21-43.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE	Note
	FIRST MESA	AZ 281 C	0.00	290.00	90.0	-290.0	
KAJM	CAMP VERDE	AZ 282 C	243.09	241.00	228.8	2.1	
KZGL	FLAGSTAFF	AZ 279 C3	122.61	96.00	246.5	26.6	
KZGL*	FLAGSTAFF	AZ 279 C3	124.12	96.00	249.5	28.1	

1 Facility studied

CERTIFICATE OF SERVICE

I, Emily Daniels, an associate with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that a copy of the foregoing Petition for Rulemaking was served via U.S. mail on this 15th day of September 2008 to the following:

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