

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

In the Matter of	)		
	)		
Amendment of Section 73.202(b),	)		
Table of Allotments,	)	MB Docket No. 11-207	
FM Broadcast Stations	)	RM-11517	
	)		
(Ehrenberg, First Mesa, Kachina Village,	)		FILED/ACCEPTED
Wickenburg, and Williams, Arizona)	)		
	)		
(Ehrenberg, First Mesa, and Kachina Village,	)	RM-11518	FEB 21 2012
Arizona)	)	and	Federal Communications Commission
	)		Office of the Secretary
Application of	)		
Univision Radio License Corporation	)	File No. BPH-20080915AFP	
KHOV-FM, Wickenburg, Arizona	)		

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

**COMMENTS AND RESPONSE TO ORDER TO SHOW CAUSE**

Univision Radio License Corporation (“Univision”), licensee of KHOV-FM (“KHOV”), Wickenburg, Arizona, by its attorneys, hereby responds to the Notice of Proposed Rulemaking and Order to Show Cause, DA 11-2058 (rel. Dec. 23, 2011) (the “NPRM”), in the captioned proceeding.<sup>1</sup>

The proposal embodied in Univision’s Petition and hybrid Application (the “Wickenburg Petition and Application”) will demonstrably better serve the public interest than the competing proposal contained in the Petition (the “Williams Petition”) of Rocket Radio, Inc. (“Rocket Radio”). As will be shown below, the Wickenburg Petition and Application will

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<sup>1</sup> Univision’s response is timely filed pursuant to Section 1.4(e)(1) and (j) of the Commission’s Rules (where filing date falls on holiday document to be filed on next business day). Univision respectfully requests that the Commission update its records in this proceeding to substitute undersigned counsel on behalf of Univision.

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provide a new second, third, and fourth full-time aural service to several times more people, and will bring a new FM radio service to more than 18 times more people, than the Williams Petition. Accordingly, the Commission should grant Univision's Petition and hybrid Application and deny the Williams Petition. Furthermore, for good cause shown due to the demonstrable superiority of the Wickenburg Petition and Application under the Commission's revised FM Allotment Priorities, the Commission should decline to modify Univision's license with respect to KHOV as requested by Rocket Radio.

As the Commission correctly observes, the Wickenburg Petition and Application, which propose to upgrade KHOV from channel 287C2 to channel 286C0, and the Williams Petition, which requests the allotment of channel 287C2 to Williams, Arizona, are mutually exclusive and therefore cannot both be granted. *See* NPRM at ¶ 6. Accordingly, the Commission must apply the FM Allotment Priorities to evaluate which petition would better serve the public interest. The FM Allotment Priorities are (1) first full-time aural service, (2) second full-time aural service, (3) first local service, and (4) other public interest matters.<sup>2</sup> It is clear that when the proposals are evaluated on the basis of the FM Allotment Priorities and the public interest the Wickenburg Petition and Application is superior and should prevail.

Attached as exhibits hereto are updated engineering analyses with respect to the two competing proposals prepared by Univision's consulting engineer Charles Staples of CS Broadcast Technical Services, Inc., using V-Soft Communications Probe 4 software and incorporating 2010 U.S. Census data. Exhibit 1 illustrates the new service that would result from the Wickenburg Petition and Application as filed.<sup>3</sup> Exhibit 2 illustrates the new service that

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<sup>2</sup> Neither party has claimed that its proposal would result in first local service, so Priority 3 will not be discussed.

<sup>3</sup> Exhibit 1 is comprised of Exhibit 1A, which illustrates the total service that would result from the Wickenburg Petition and Application, and Exhibit 1B, which illustrates the present KHOV service. The new service that would

would result from the maximum facilities that could be authorized pursuant to the Williams Petition, based on the assumptions described below.

In its evaluation of the competing proposals under the FM Allotment Priorities, Univision has made certain factual assumptions favorable to the Williams Petition. First, the data on which we rely assume for purposes of argument, as Rocket Radio's Petition assumed, that KYET(AM) is dark or has been relocated from Williams to Golden Valley, Arizona.<sup>4</sup> To be clear, Univision does not concede that KYET is dark or has moved; to the contrary, it appears that KYET is operating in Williams, and thus it is Univision's view that proper application of the FM Allocation Priorities would take KYET into account as an existing service in Williams.<sup>5</sup> Nevertheless, strictly for purposes of the discussion below, Univision will assume that KYET is dark or has been relocated in order to demonstrate that the Wickenburg Petition and Application should prevail even making the assumptions most favorable to the Williams Petition.<sup>6</sup>

Moreover, while the data with respect to the Wickenburg Petition and Application in Exhibit 1 are based on the facilities for the upgraded KHOV specified in Univision's Application, the data in Exhibit 2 assume that if the Williams Petition is granted the newly allotted channel in Williams would be constructed to its maximum allowable facilities. We make this assumption for purposes of argument even though Rocket Radio's pending construction permit application for the requested channel would result in a significantly lower

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result from the Wickenburg Petition and Application is calculated by subtracting the figures in Exhibit 1B from those in Exhibit 1A.

<sup>4</sup> This assumption favors the Williams Petition because if, instead, one were to treat KYET as operational and remaining allotted to Williams (as Univision believes should be done), then the people shown in Exhibit 2 as receiving a first service from the Williams Petition in fact would be receiving a second service, those shown as receiving a second service would be receiving a third service, and so on.

<sup>5</sup> To assist the Commission in its calculation, Exhibit 3 hereto shows the new service that would result from the maximum facilities that could be authorized pursuant to the Williams Petition, treating KYET is operational and located in Williams.

<sup>6</sup> The Wickenburg Petition and Application also should prevail even if KYET is included in the analysis.

level of new service.<sup>7</sup> We employ these assumptions in order to show that, *even giving the benefit of every doubt to the Williams Petition*, the Wickenburg Petition and Application is superior under the FM Allotment Priorities and therefore should prevail.

*First*, the first aural reception service to 14 persons that would result from the Williams Petition is *de minimis* under the FM Allotment Priorities and therefore does not trigger Priority 1 for purposes of comparison.<sup>8</sup> “[W]hether an additional service gain to a particular number of persons is *de minimis* directly relates to the total number of persons that would be affected by an allotment proceeding.”<sup>9</sup> As shown below, in contrast to the 14 individuals at issue with respect to Priority 1, the number of people at issue with respect to Priority 2 is in the thousands and the number at issue with respect to Priority 4 is over a million. Moreover, the Commission previously has determined a new service for dozens or even hundreds of persons to be *de minimis*.<sup>10</sup> Here, the fact that a mere 14 individuals would receive first aural reception is clearly *de minimis* and not determinative of the public interest.

*Second*, the Wickenburg Petition and Application is entitled to preference pursuant to Priority 2. The Wickenburg Petition and Application will result in new second service to 1,428 people, while the Williams Petition could result in new second aural service to --

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<sup>7</sup> Exhibit 4 hereto shows the new service that would result from grant of the Williams Petition and activation of the facilities actually proposed in Rocket Radio’s pending construction permit application, assuming that KYET(AM) is dark and/or relocated. Exhibit 5 hereto shows the new service that would result from grant of the Williams Petition and activation of the facilities actually proposed in Rocket Radio’s pending construction permit application, assuming that KYET(AM) is active and has not been relocated. As noted above, Univision does not rely on these data for purposes of its arguments herein, which are based on assumptions most favorable to Rocket Radio.

<sup>8</sup> See Exhibit 2. The NPRM states that the Williams Petition could result in a first aural service to 16 people, see NPRM ¶ 7, which likewise should be deemed *de minimis*. If KYET is included in the analysis, as Univision believes it should be, the first service figure becomes zero. See Exhibit 3.

<sup>9</sup> *Seabrook, Huntsville, et al., Texas*, Memorandum Opinion and Order, MM Dkt. No. 91-180, 10 FCC Rcd 9360, 9362 (1995).

<sup>10</sup> See, e.g., *id.* (finding that a second aural service to 455 persons is *de minimis* and not entitled to a preference under Priority 2); *Live Oak and St. Augustine, Florida*, Report and Order, MM Dkt. No. 87-264, 4 FCC Rcd 758, 759 (1989) (finding a first aural service to 60 people is *de minimis*).

at most -- only 539 people.<sup>11</sup> This is a substantial difference and by itself justifies grant of the Wickenburg Petition and Application and rejection of the Williams Petition.

*Third*, even if the Wickenburg Petition and Application does not prevail under Priority 2 alone, it is superior when evaluated under the broad public interest rubric of Priority 4. Grant of the Wickenburg Petition and Application will result in a substantially higher level of service than the Williams Petition to underserved areas under Priority 4. Thus, while grant of the Williams Petition could result in third service to 207 people, granting the Wickenburg Petition and Application will result in third service to 840 people.<sup>12</sup> Similarly, while grant of the Williams Petition could result in fourth service to 24 people, grant of the Wickenburg Petition and Application will result in fourth service to 58 people.<sup>13</sup> The Commission has stated that heightened emphasis under Priority 4 is given to service to underserved areas, so these data strongly support a conclusion that the Wickenburg Petition and Application is superior.<sup>14</sup> *Id.* ¶ 9.

Furthermore, grant of the Wickenburg Petition and Application would result in substantially greater public interest benefits because it will result in overall new service to more than *18.5 times* more people than the Williams Petition. Grant of the Wickenburg Petition and Application will result in new service to an additional 1,258,966 people, a figure that dwarfs the 67,485 people -- at most, and subject to the favorable assumptions described above -- who could

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<sup>11</sup> See Exhibits 1 and 2. The Williams Petition Priority 2 figure that we cite above is significantly greater than the 417 people calculated in the NPRM. See NPRM ¶ 7. If KYET is included in the analysis, as Univision believes it should be, the second service figure for the Williams Petition falls to 14. See Exhibit 3.

<sup>12</sup> See Exhibits 1 and 2. If KYET is included in the analysis, as Univision believes it should be, the third service figure for the Williams Petition becomes 539, still lower than the 840 figure for the Wickenburg Petition and Application. See Exhibit 3.

<sup>13</sup> See Exhibits 1 and 2. If KYET is included in the analysis, as Univision believes it should be, the fourth service figure for the Williams Petition is 207. Although higher than the fourth service figure achieved by the Wickenburg Petition and Application, it still is outweighed by the third and second service figures cited above. See Exhibit 3.

<sup>14</sup> That the Williams Petition could result in fifth service to 39 people if KYET is excluded or 24 people if KYET is included (see Exhibits 2 and 3 respectively) is outweighed by the fact that grant of the Wickenburg Petition and Application would result in a significantly greater amount of third service.

receive service if the Williams Petition is granted. See Exhibits 1 and 2. This huge disparity clearly demonstrates that grant of the Wickenburg Petition and Application would better serve the public interest.

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Even when evaluated on the basis of assumptions that favor the Williams Petition, the Wickenburg Petition and Application is superior because it will result in a new second, third, and fourth aural service to, in each case, a greater number of people, and because it will result in a new aural service to more than 18 times as many people. Accordingly, for all the reasons stated above, the Commission should adopt the changes to the FM Table of Allotments proposed in the Wickenburg Petition and grant the associated Application. Univision further requests that the Commission deny the mutually exclusive Williams Petition and, for good cause shown, decline to modify Univision's license for KHOV in order to accommodate the Williams Petition.

Respectfully submitted,

**UNIVISION RADIO LICENSE  
CORPORATION**

By:   
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Mace Rosenstein  
Daniel H. Kahn

COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2401  
(202) 662-6000

*Its Counsel*

February 21, 2012

**EXHIBIT 1A**

Service Count Population Report - Service Count: KHOV-FM.A (286): FCC  
F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: KHOV-FM.A (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

KHOV-FM.A (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KPHF (202): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KNAI (202): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KNAU (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)  
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KJZP (211): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KFLR-FM (212): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KGCB (215): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KJZZ (218): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KTAR-FM (222): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KFLX (223): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KAFF-FM (225): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KDKB (227): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KMGN (230): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KDDL (232): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KOOL-FM (233): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KVIB (236): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KYOT-FM (238): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KKLD (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KSWG (242): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KMXP (245): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KMVA (248): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KUPD (250): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KKFR (252): FCC F(50-50) 60.00 dBu (FCC HAAT)  
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KESZ (260): FCC F(50-50) 60.00 dBu (FCC HAAT)  
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KHOV-FM (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KLVA (288): FCC F(50-50) 60.00 dBu (FCC HAAT)  
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KPPV (294): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KDVA (295): FCC F(50-50) 60.00 dBu (FCC HAAT)

KVVA-FM (296): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KSED (298): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KFTT (299): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KMLE (300): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KFLG-FM (234): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KFNX : Imported: 2.0 mV/m  
 KMIK : Imported: 2.0 mV/m  
 KIHP : Imported: 2.0 mV/m  
 KSUN : Imported: 2.0 mV/m  
 KCKY : Imported: 2.0 mV/m  
 KAZG : Imported: 2.0 mV/m  
 KDUS : Imported: 2.0 mV/m  
 KMVP : Imported: 2.0 mV/m  
 KIDR : Imported: 2.0 mV/m  
 KKNT : Imported: 2.0 mV/m  
 KFNN : Imported: 2.0 mV/m  
 KPXQ : Imported: 2.0 mV/m  
 KOY : Imported: 2.0 mV/m  
 KXEG : Imported: 2.0 mV/m  
 KGME : Imported: 2.0 mV/m  
 KPHX : Imported: 2.0 mV/m  
 KNUV : Imported: 2.0 mV/m  
 KTAR : Imported: 2.0 mV/m  
 KFYI : Imported: 2.0 mV/m  
 KXXT : Imported: 2.0 mV/m  
 KASA : Imported: 2.0 mV/m  
 KAZM : Imported: 2.0 mV/m  
 KBMB : Imported: 2.0 mV/m  
 KYCA : Imported: 2.0 mV/m  
 KNOT : Imported: 2.0 mV/m  
 KQNA : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	1	370.31
2 Service	1,428	1,029	1141.82
3 Service	840	496	1189.43
4 Service	58	51	670.98
5 Service	4	2	365.91
6 Service	180	78	518.08
7 Service	76	32	401.24
8 Service	105	57	613.02
9 Service	111	52	538.99
10 Service	139	95	633.16
11 Service	1,135	517	720.51
12 Service	171	79	552.16
13 or more	1,298,047	547,228	10397.86
Reference Area	1,302,294	549,717	18113.47

  

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	1,428	1,428	0.1 %
3 Service	840	2,268	0.2 %
4 Service	58	2,326	0.2 %
5 Service	4	2,330	0.2 %
6 Service	180	2,510	0.2 %
7 Service	76	2,586	0.2 %
8 Service	105	2,691	0.2 %

9 Service	111	2,802	0.2 %
10 Service	139	2,941	0.2 %
11 Service	1,135	4,076	0.3 %
12 Service	171	4,247	0.3 %
13 or more	1,298,047	1,302,294	100.0 %

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	Housing Units	Population
Arizona		
La Paz County		
Total	16,049	20,489
1 Service	1	0
2 Service	1,026	1,418
3 Service	468	812
4 Service	37	24
5 Service	0	0
6 Service	0	0
7 Service	0	0
8 Service	0	0
9 Service	0	0
Reference Area	1,532	2,254
Maricopa County		
Total	1,639,279	3,817,117
4 Service	14	34
5 Service	2	4
6 Service	55	140
7 Service	31	76
8 Service	44	97
9 Service	10	26
10 Service	82	122
11 Service	470	1,075
12 Service	16	39
13 or more	524,520	1,258,873
Reference Area	525,244	1,260,486
Mohave County		
Total	110,911	200,186
2 Service	3	10
3 Service	28	28
5 Service	0	0
6 Service	0	0
Reference Area	31	38
Yavapai County		
Total	110,432	211,033
2 Service	0	0
5 Service	0	0
6 Service	23	40
7 Service	1	0
8 Service	13	8
9 Service	42	85
10 Service	13	17
11 Service	47	60
12 Service	63	132
13 or more	22,708	39,174
Reference Area	22,910	39,516

**EXHIBIT 1B**

KHOV-FM License Counts

Service Count Population Report - Service Count: KHOV-FM (287): FCC  
F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: KHOV-FM (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

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 KMIK : Imported: 2.0 mV/m  
 KIHP : Imported: 2.0 mV/m  
 KSUN : Imported: 2.0 mV/m  
 KCKY : Imported: 2.0 mV/m  
 KAZG : Imported: 2.0 mV/m  
 KDUS : Imported: 2.0 mV/m  
 KMVP : Imported: 2.0 mV/m  
 KIDR : Imported: 2.0 mV/m  
 KKNT : Imported: 2.0 mV/m  
 KFNN : Imported: 2.0 mV/m  
 KPXQ : Imported: 2.0 mV/m  
 KOY : Imported: 2.0 mV/m  
 KXEG : Imported: 2.0 mV/m  
 KGME : Imported: 2.0 mV/m  
 KPHX : Imported: 2.0 mV/m  
 KNUV : Imported: 2.0 mV/m  
 KTAR : Imported: 2.0 mV/m  
 KFYI : Imported: 2.0 mV/m  
 KXXT : Imported: 2.0 mV/m  
 KASA : Imported: 2.0 mV/m  
 KAZM : Imported: 2.0 mV/m  
 KBMB : Imported: 2.0 mV/m  
 KYCA : Imported: 2.0 mV/m  
 KNOT : Imported: 2.0 mV/m  
 KQNA : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	2.25
2 Service	0	0	65.77
3 Service	0	0	81.72
4 Service	0	0	15.30
5 Service	26	14	226.74
6 Service	4	2	247.48
7 Service	8	12	366.09
8 Service	13	12	361.03
9 Service	131	90	511.95
10 Service	1,036	465	571.81
11 Service	167	78	480.69
12 Service	1,985	1,191	613.85
13 or more	39,958	21,465	5196.47
Reference Area	43,328	23,329	8741.15

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	0	0	0.0 %
3 Service	0	0	0.0 %
4 Service	0	0	0.0 %
5 Service	26	26	0.1 %
6 Service	4	30	0.1 %
7 Service	8	38	0.1 %
8 Service	13	51	0.1 %

9 Service	131	182	0.4 %
10 Service	1,036	1,218	2.8 %
11 Service	167	1,385	3.2 %
12 Service	1,985	3,370	7.8 %
13 or more	39,958	43,328	100.0 %

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	Housing Units	Population
Arizona		
La Paz County		
Total	16,049	20,489
3 Service	0	0
4 Service	0	0
5 Service	0	0
6 Service	0	0
7 Service	0	0
8 Service	0	0
Reference Area	0	0
Maricopa County		
Total	1,639,279	3,817,117
5 Service	14	26
6 Service	1	4
7 Service	0	0
8 Service	5	9
9 Service	82	122
10 Service	429	997
11 Service	15	35
12 Service	64	80
13 or more	18,785	36,104
Reference Area	19,395	37,377
Yavapai County		
Total	110,432	211,033
5 Service	0	0
6 Service	1	0
7 Service	12	8
8 Service	7	4
9 Service	8	9
10 Service	36	39
11 Service	63	132
12 Service	1,127	1,905
13 or more	2,680	3,854
Reference Area	3,934	5,951

**EXHIBIT 2**

Williams 287C2 Allocation  
(without KYET)

Service Count Population Report - Service Count: 1265795.A (287):  
Circle R = 52.0 km

Reference Area: 1265795.A (287): Circle R = 52.0 km  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

1265795.A (287): Circle R = 52.0 km  
 KNAU (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KJZA (208): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KJTA (210): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KGCB (215): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KPUB (219): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAFF-FM (225): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KMGH (230): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KDDL (232): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KKLD (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KWMX (244): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZXX (255): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KVNA-FM (261): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAHM (271): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KUGO (273): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KQST (275): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZKE (277): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZGL (279): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KBTk (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KVRD-FM (289): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KFSZ (291): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KSED (298): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAZM : Imported: 2.0 mV/m  
 KAFF : Imported: 2.0 mV/m  
 KVNA : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	14	27	617.85
2 Service	539	368	900.16
3 Service	207	203	290.32
4 Service	24	31	174.62
5 Service	39	28	96.38
6 Service	729	550	305.46
7 Service	4,202	1,835	335.29
8 Service	545	396	630.45
9 Service	336	205	349.75
10 Service	7	5	86.10
11 Service	25	27	198.61
12 Service	174	96	203.56
13 or more	60,644	26,269	4308.05
Reference Area	67,485	30,040	8496.60
	Service Pop	Running Total	Percent
1 Service	14	14	0.0 %
2 Service	539	553	0.8 %
3 Service	207	760	1.1 %

4 Service	24	784	1.2 %
5 Service	39	823	1.2 %
6 Service	729	1,552	2.3 %
7 Service	4,202	5,754	8.5 %
8 Service	545	6,299	9.3 %
9 Service	336	6,635	9.8 %
10 Service	7	6,642	9.8 %
11 Service	25	6,667	9.9 %
12 Service	174	6,841	10.1 %
13 or more	60,644	67,485	100.0 %

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	Housing Units	Population
Arizona		
Coconino County		
Total	63,321	134,421
1 Service	27	14
2 Service	363	533
3 Service	126	120
4 Service	7	0
5 Service	25	35
6 Service	524	704
7 Service	102	145
8 Service	8	10
9 Service	0	0
10 Service	1	0
11 Service	27	25
12 Service	14	14
13 or more	26,171	60,510
Reference Area	27,395	62,110
Yavapai County		
Total	110,432	211,033
2 Service	5	6
3 Service	77	87
4 Service	24	24
5 Service	3	4
6 Service	26	25
7 Service	1,733	4,057
8 Service	388	535
9 Service	205	336
10 Service	4	7
12 Service	82	160
13 or more	98	134
Reference Area	2,645	5,375

**EXHIBIT 3**

287C2 Williams Allocation (With KYET)

Service Count Population Report - Service Count: 1265795.A (287):  
Circle R = 52.0 km

Reference Area: 1265795.A (287): Circle R = 52.0 km  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

1265795.A (287): Circle R = 52.0 km  
 KNAU (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KJZA (208): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KJTA (210): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KGCB (215): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KPUB (219): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAFF-FM (225): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KMGH (230): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KDDL (232): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KKLD (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KWMX (244): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZXX (255): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KVNA-FM (261): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAHM (271): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KUGO (273): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KQST (275): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZKE (277): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KZGL (279): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KBTk (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KVRD-FM (289): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KFSZ (291): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KSED (298): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 KAZM : Imported: 2.0 mV/m  
 KAFF : Imported: 2.0 mV/m  
 KVNA : Imported: 2.0 mV/m  
 KYET : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	0.00
2 Service	14	27	617.85
3 Service	539	368	900.16
4 Service	207	203	290.32
5 Service	24	31	174.62
6 Service	39	28	96.38
7 Service	729	550	305.46
8 Service	4,202	1,835	335.29
9 Service	545	396	630.45
10 Service	336	205	349.75
11 Service	7	5	86.10
12 Service	25	27	198.61
13 or more	60,818	26,365	4511.61
Reference Area	67,485	30,040	8496.60

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	14	14	0.0 %
3 Service	539	553	0.8 %

4 Service	207	760	1.1 %
5 Service	24	784	1.2 %
6 Service	39	823	1.2 %
7 Service	729	1,552	2.3 %
8 Service	4,202	5,754	8.5 %
9 Service	545	6,299	9.3 %
10 Service	336	6,635	9.8 %
11 Service	7	6,642	9.8 %
12 Service	25	6,667	9.9 %
13 or more	60,818	67,485	100.0 %

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	Housing Units	Population
Arizona		
Coconino County		
Total	63,321	134,421
2 Service	27	14
3 Service	363	533
4 Service	126	120
5 Service	7	0
6 Service	25	35
7 Service	524	704
8 Service	102	145
9 Service	8	10
10 Service	0	0
11 Service	1	0
12 Service	27	25
13 or more	26,185	60,524
Reference Area	27,395	62,110
Yavapai County		
Total	110,432	211,033
3 Service	5	6
4 Service	77	87
5 Service	24	24
6 Service	3	4
7 Service	26	25
8 Service	1,733	4,057
9 Service	388	535
10 Service	205	336
11 Service	4	7
13 or more	180	294
Reference Area	2,645	5,375

**EXHIBIT 4**

Rocket Application (Without KYET)

Service Count Population Report - Service Count: 1265795.A (287): FCC  
F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: 1265795.A (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

1265795.A (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KNAU (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KJZA (208): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KJTA (210): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KGCB (215): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KPUB (219): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KAFF-FM (225): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KMGH (230): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KDDL (232): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KKLD (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KWMX (244): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KZXX (255): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KVNA-FM (261): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KAHM (271): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KUGO (273): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KQST (275): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KZKE (277): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KZGL (279): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KBTK (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KVRD-FM (289): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KFSZ (291): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KSED (298): FCC F(50-50) 60.00 dBu (FCC HAAT)  
KAZM : Imported: 2.0 mV/m  
KAFF : Imported: 2.0 mV/m  
KVNA : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	14	26	460.29
2 Service	278	151	394.96
3 Service	2	7	141.92
4 Service	0	1	104.64
5 Service	35	25	73.54
6 Service	715	533	205.07
7 Service	326	214	120.63
8 Service	328	191	225.61
9 Service	111	91	217.23
10 Service	0	1	8.20
11 Service	0	0	21.00
12 Service	14	14	49.48
13 or more	5,990	3,988	1616.14
Reference Area	7,813	5,242	3638.71

	Service Pop	Running Total	Percent
1 Service	14	14	0.2 %
2 Service	278	292	3.7 %
3 Service	2	294	3.8 %

4 Service	0	294	3.8 %
5 Service	35	329	4.2 %
6 Service	715	1,044	13.4 %
7 Service	326	1,370	17.5 %
8 Service	328	1,698	21.7 %
9 Service	111	1,809	23.2 %
10 Service	0	1,809	23.2 %
11 Service	0	1,809	23.2 %
12 Service	14	1,823	23.3 %
13 or more	5,990	7,813	100.0 %

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	Housing Units	Population
Arizona		
Coconino County		
Total	63,321	134,421
1 Service	26	14
2 Service	151	278
3 Service	7	2
4 Service	1	0
5 Service	25	35
6 Service	524	704
7 Service	102	145
8 Service	6	8
9 Service	0	0
10 Service	1	0
11 Service	0	0
12 Service	14	14
13 or more	3,988	5,990
Reference Area	4,845	7,190
Yavapai County		
Total	110,432	211,033
6 Service	9	11
7 Service	112	181
8 Service	185	320
9 Service	91	111
10 Service	0	0
13 or more	0	0
Reference Area	397	623

**EXHIBIT 5**

Rocket Application Service Count (With KYET)

Service Count Population Report - Service Count: 1265795.A (287): FCC  
F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: 1265795.A (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Services Included in Count:

- 1265795.A (287): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KNAU (204): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KJZA (208): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KJTA (210): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KGCB (215): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KPUB (219): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KAFF-FM (225): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KMGH (230): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KDDL (232): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KKLD (240): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KWMX (244): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KZXX (255): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KVNA-FM (261): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KAHM (271): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KUGO (273): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KQST (275): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KZKE (277): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KZGL (279): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KBTK (286): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KVRD-FM (289): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KFSZ (291): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KSED (298): FCC F(50-50) 60.00 dBu (FCC HAAT)
- KAZM : Imported: 2.0 mV/m
- KAFF : Imported: 2.0 mV/m
- KVNA : Imported: 2.0 mV/m
- KYET : Imported: 2.0 mV/m

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	0.00
2 Service	14	26	460.29
3 Service	278	151	394.96
4 Service	2	7	141.92
5 Service	0	1	104.64
6 Service	35	25	73.54
7 Service	715	533	205.07
8 Service	326	214	120.63
9 Service	328	191	225.61
10 Service	111	91	217.23
11 Service	0	1	8.20
12 Service	0	0	21.00
13 or more	6,004	4,002	1665.62
Reference Area	7,813	5,242	3638.71

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	14	14	0.2 %
3 Service	278	292	3.7 %

4 Service	2	294	3.8 %
5 Service	0	294	3.8 %
6 Service	35	329	4.2 %
7 Service	715	1,044	13.4 %
8 Service	326	1,370	17.5 %
9 Service	328	1,698	21.7 %
10 Service	111	1,809	23.2 %
11 Service	0	1,809	23.2 %
12 Service	0	1,809	23.2 %
13 or more	6,004	7,813	100.0 %

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	Housing Units	Population
Arizona		
Coconino County		
Total	63,321	134,421
2 Service	26	14
3 Service	151	278
4 Service	7	2
5 Service	1	0
6 Service	25	35
7 Service	524	704
8 Service	102	145
9 Service	6	8
10 Service	0	0
11 Service	1	0
12 Service	0	0
13 or more	4,002	6,004
Reference Area	4,845	7,190
Yavapai County		
Total	110,432	211,033
7 Service	9	11
8 Service	112	181
9 Service	185	320
10 Service	91	111
11 Service	0	0
13 or more	0	0
Reference Area	397	623

**CERTIFICATE OF SERVICE**

I, Daniel H. Kahn, hereby certify that on this 21st day of February, 2012,  
I caused a true and correct copy of the foregoing Comments and Response to Order to  
Show Cause to be delivered *via* first-class prepaid U.S. mail to the following:

Erwin G. Krasnow, Esq.  
Garvey Schubert Barer  
1000 Potomac Street, N.W.  
Fifth Floor, Flour Mill Building  
Washington, DC 2007-3501

*Counsel to Rocket Radio, Inc.*



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Daniel H. Kahn