

Exhibit in Support of
Continuation of WQBX(FM)'s Historical Community of License

The present application seeks the reinstatement of Alma, Michigan, as WQBX(FM)'s community of license. The Commission currently considers Fowler, Michigan, to be WQBX(FM)'s community of license because it in 2007 granted a modification application permitting the station to relocate its facilities and to change community of license to Fowler. WQBX(FM) never moved from Alma to Fowler, however. It has never been located in Fowler or even served that community, which is located approximately 25 miles from Alma, at any time.

By contrast, this year marks the 50th anniversary of WQBX(FM)'s commencement of service to Alma, Michigan. Alma was WQBX(FM)'s community of license on the day that the station commenced operations in November 1964 and it has continuously provided service to Alma since then. The station's studios are located at 5310 N. State Road in Alma, a location that has been used by WQBX(FM) and/or co-owned WFYC(AM) since 1948. The owners of the station both in 1964 and now live in Alma and are actively involved in the community. Past and current owners of WQBX have been board members of the Chamber of Commerce, the Rotary, Lions, and Kiwanis service organizations, chairpersons of the United Way Fund Drive in Alma and more, just to name a few.

WQBX(FM)'s programming has always been, and continues to be, Alma-centric. The station daily airs local news and weather and, as applicable, school closing information. It broadcasts severe weather coverage on a 24/7 basis. The station runs literally hundreds of public service announcements each year for local schools, churches, civic groups and charitable fundraisers. It has been the broadcast voice of Alma High School sports since 1965, providing live coverage of the games. Past owner David Sommerville has been inducted into the Alma Athletic Hall of Fame for his broadcast efforts. The station has been twice recognized by the Michigan Association of Broadcasters for Excellence in High School Sports Play-by-Play for its coverage of Alma sports. WQBX(FM) has been the local voice for the annual Alma Highland Festival since the Festival's beginning in 1968. Two past employees of the station have been recognized for their efforts by being named Grand Marshall of the Festival parade. The station participates in the Gratiot County Fair for Youth and the Coats for Kids promotion conducted in Alma.

Moreover, that local service is coupled with long-standing local family management. At the time that WQBX(FM) commenced operations, the station manager was David W. Sommerville. In 1985, the station was assigned to the family's Sommerville Broadcasting, Inc., and, in 1996, was assigned to Jacom, Inc., which continues to be the licensee of the station. Jacom is jointly owned by James P. Sommerville and his ex-wife Susan C. Duffy, both of whom are long-time residents of Alma. All of the children of the past and present owners of WQBX(FM) have attended, and graduated from, Alma Public Schools.

In approximately 2007, Jacom was approached by American Media Services about the possibility of selling WQBX(FM). It was explained to Jacom that the possible sale would

require that WQB(X)FM move to the south in the expectation that the station ultimately would be able to provide service to the Lansing, Michigan, market. The relocation of WQB(X)FM to the South required that WQB(X)FM's community of license be changed to Fowler, a community that is closer to Lansing than Alma is. Jacom was not represented by counsel and did not realize that, upon grant of the modification application proposing to move the WQB(X)FM facilities and change WQB(X)FM's community of license to Fowler, the WQB(X)FM community of license would automatically be changed to Fowler, even if the contemplated sale of WQB(X)FM did not occur and even if the relocated WQB(X)FM facilities were not constructed. Unlike the situation with other construction permits granted by the Commission, a station that has been granted a construction permit that changes the station's community of license cannot simply turn the permit in or let it lapse if the station decides that it no longer wishes to change its community of license.

Using American Media Services as its engineering firm, Jacom filed a facilities modification application on June 4, 2007 (BPH-20070604ABL). From what Jacom has been able to subsequently discover, the FAA did not issue a no-hazard determination with respect to the 128 meter tower specified in the June 4, 2007, application, but the application was nevertheless granted on October 26, 2007, with an entry indicating that antenna registration was not required. Three days later, Jacom, at the request of American Media Services, filed an application seeking to modify the October 26, 2007, construction permit to specify a proposed transmitter site approximately .3 km to the northeast of the site specified in the October 26, 2007, construction permit (BMPH-20071029AAQ). American Media Services did not obtain a no-hazard determination with respect to this second site, either, and, as a result, the application was dismissed by the Commission by letter of October 1, 2009. Thus, as of October 1, 2009, Jacom was left holding a construction permit that required it to change its community of license, but that specified a tower for which the FAA had not issued a no-hazard determination.

Moreover, at some point during the pendency of the October 29, 2007 modification application, American Media Services essentially stopped doing business, with the result that there was no longer a possibility of the contemplated sale moving forward. With the collapse of the original proposal for the purchase of WQB(X)FM, there no longer was an interested purchaser willing to finance the construction of the facilities specified in the Fowler construction permit. In addition, the collapse of the contemplated sale took place against the backdrop of a dramatic change in the economics of the radio industry – a change that continues to haunt smaller market stations.

Jacom could only have financed the construction of the Fowler facilities if the construction of those facilities were financed by a purchaser of the station. Jacom simply cannot afford to construct a new WQB(X)FM transmission facility, especially given the fact that the relocation of WQB(X)FM to Fowler would deprive the station of the revenue from Alma and the surrounding area on which it has survived for decades. Instead of being able to take advantage of the economies resulting from joint operation of WQB(X)FM and its WFYC(AM), Jacom would be forced to attempt to operate WQB(X)FM as a standalone FM station in competition with the multiple FM stations already serving the area around Fowler.

A standalone Fowler station is not a viable proposition. WQBX(FM) is able to make ends meet as an Alma station by heavily relying on local business. In fact, 90% of WQBX(FM)'s revenue comes from local businesses. In contrast to Alma, which supports numerous local businesses, Fowler has approximately only 30 businesses. If half of those businesses were to advertise on WQBX(FM) (which would represent an extraordinarily high percentage of local businesses advertising on a radio station) and each of those stations were to spend \$2,000 on advertising on WQBX(FM) (a figure that is high, but not outlandishly so), the total revenue to the station would be only \$30,000, which is a sum that would be insufficient to pay even a fraction of the station's operating expenses.

Not only would operation of WQBX(FM) as a standalone station likely doom WQBX(FM) to failure, but it would also call into question the continued viability of Jacom's WFYC(AM), a Class D AM station that would be left as the only commercial station providing transmission service to Alma. WFYC(AM) heavily relies on WQBX(FM) to share the costs of operating the Alma studios. Without WQBX(FM) to support it, WFYC(AM)'s ability to survive becomes questionable.

Because it wishes to continue to provide service to Alma and, in any event, does not have the funds to construct the Fowler facilities, Jacom is filing the present application to once again have Alma, the community that it has served for 50 years, specified as the station's community of license.

Jacom has commissioned Owl Engineering & EMC Test Labs, Inc., to prepare a study, attached hereto as Attachment 1, that compares the coverage of WQBX(FM) operating from Fowler and WQBX(FM) operating from Alma and fully realizes that, operating from Fowler, WQBX(FM) would provide first local transmission service to Fowler, a community of 1,208 persons, and, in comparison to the continued provision of service with WQBX(FM)'s licensed facilities, would provide additional reception service to 15,356 people¹ and an additional area of 27.6 square kilometers. Those numbers are illusory, however. Not only did the tower specified in the October 26, 2007, construction permit never receive FAA approval, but the fact is that Jacom cannot afford to construct the tower and related transmission facility. If a tower cannot be built, it cannot provide service. Moreover, Jacom has never provided service to Fowler and, as the Commission has frequently acknowledged, the loss of potential transmission service does not raise the same level of concern as would the loss of a community's actual transmission service. *See, e.g., Warrenton and Enfield, North Carolina and La Crosse and Powhatan, Virginia*, 13 FCC Rcd 13889, 13892 (1998).

Moreover, in recently revisiting its allotment and assignment priorities, the Commission maintained the traditional four priorities,² but modified the application of those priorities so that

¹ The fact that the Fowler facility would provide service to more people than the Alma facility is not surprising. Fowler is in Clinton County, Michigan, which is part of the Lansing-East Lansing Metro Market. By contrast, Alma is part of Gratiot County, which is not part of any Metro Market.

² The four priorities are: (1) First fulltime aural (reception) service; (2) Second fulltime aural service; (3) First local (transmission) service; and (4) Other public interest matters. Priorities (2) and (3) are considered co-equal. *See Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rule Making in Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedure ("Rural Radio Reconsideration Decision")* 26 FCC Rcd 2556, 2563n.31 (2011).

they better reflect the public interest. In particular and of special relevance to the present proposal, in the *Rural Radio Reconsideration Decision*, the Commission held, in determining whether a proposed community of license change represents a preferential arrangement of assignments, that it would “strongly disfavor” any proposal to remove a second local transmission service from a community with a population of 7,500 or more people. 26 FCC Rcd at 2578. The 2010 census states that Alma has a population of 9,383 people. Two stations other than WQBX(FM) provide local transmission service to Alma. Neither of those two stations provide effective, fulltime service to Alma, however.

One of those two stations is WQAC(FM), a 100-watt college station. As the College itself explains in the letter attached hereto as Attachment 2, WQAC(FM) has a very weak signal beyond the College’s boundaries.³ Its mission, moreover, is to serve as an extracurricular activity and training facility for students, not to provide service to the larger Alma community. According to the College’s letter, the “station’s audience is Alma College students who live on the 128-acre campus... .” “The station does not cover Alma community news or events beyond the campus, nor does the station interact with the community.” As the College explains, the station “serves as primarily an academic training ground for students considering a radio broadcast career.”

The second station is Jacom’s WFYC(AM). WFYC(AM) is a Class D AM station that operates at 1,000 watts during the day, but only 56 watts at night. During the winter, sunset occurs as early as 5 PM. Given the fact that WFYC(AM) is a Class D station, even the minimal nighttime service provided by the station is not afforded any protection and the station must protect all Class A and Class B operations.

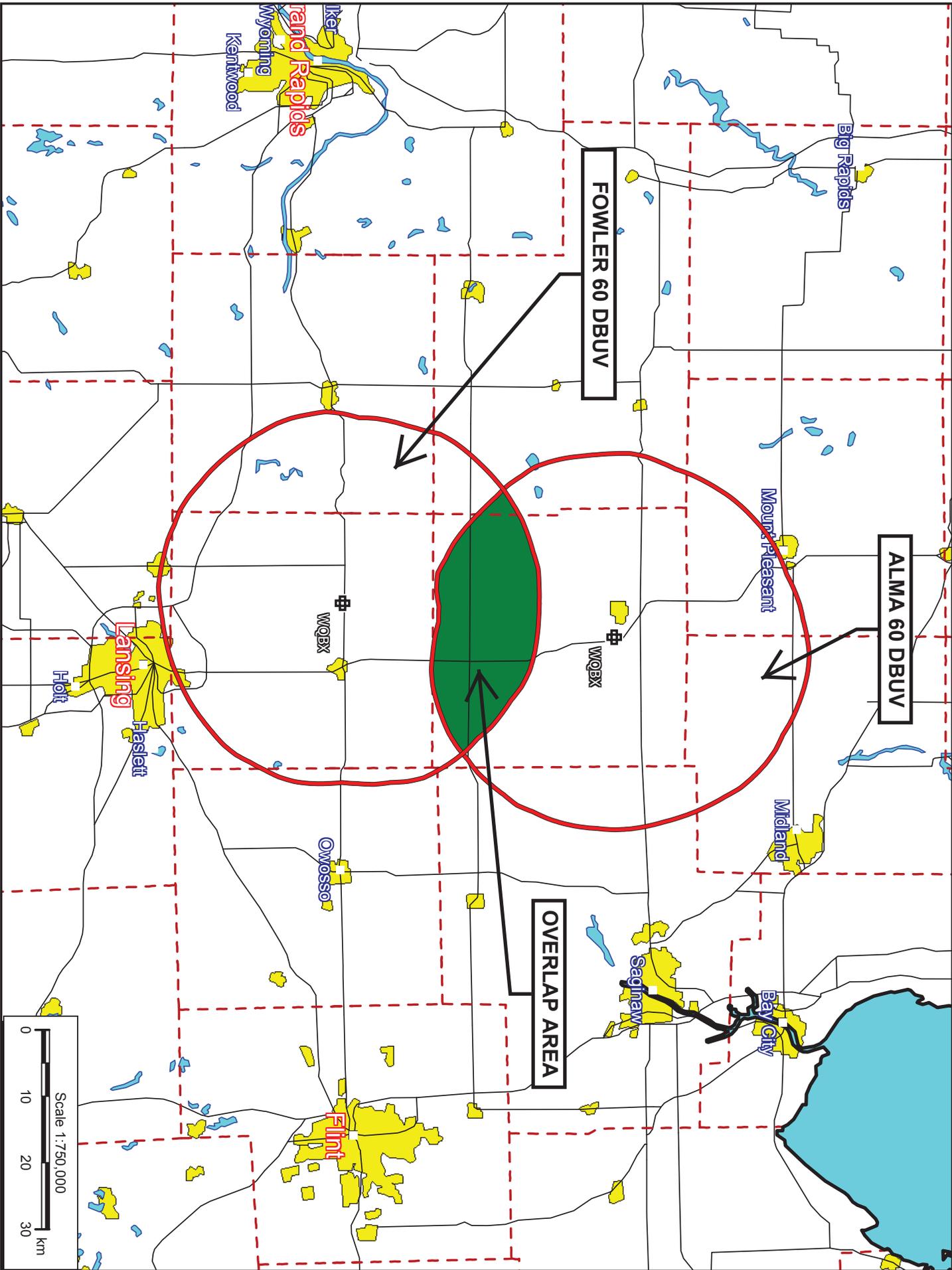
As a result, if WQBX(FM) were to be required to cease operating in Alma, residents of the community would find that they would receive local transmission service only from a 100 watt noncommercial station that barely covers the college campus, much less the community, and an AM station that must reduce power to 56 watts beginning at 5 PM during the month of December. Such a state of affairs would be inconsistent with the determination made in the *Rural Radio Reconsideration Decision* that communities of Alma’s size should receive at least two local transmission services. Given WQBX(FM)’s exemplary record of local Alma service, forcing WQBX(FM) to abandon Alma would create a void that could be filled by neither 100-watt WQAC(FM) nor Jacom’s WFYC(AM) and, because the funds are simply not available to construct a new WQBX(FM) facility at Fowler, the choice would not be one of whether Alma or Fowler is more deserving of an FM station, but whether WQBX(FM) should be forced to go silent rather than continue its 50-year history of service to Alma.

Permitting WQBX(FM) to continue to serve Alma would not result in a deprivation of reception service to the residents of the service area of the theoretical Fowler facility. As is demonstrated in the coverage maps and listing of reception services prepared by Owl Engineering & EMC Test Labs, Inc., and attached hereto as Attachment 4, at least 51 stations currently place a signal over all or part of the area that would be served by the Fowler facilities.

³ The College’s assessment of the weakness of the WQAC(FM) signal is borne out by the WQAC(FM) coverage map, attached as Attachment 3, which depicts the station’s 70 dBu contour as not encompassing all of Alma.

Whereas no harm to the public would accrue if the Commission were to again recognize Alma as WQBX(FM)'s community of license, the public, particularly the residents of Alma, would suffer significant harm if WQBX(FM) were to be forced to cease operations. As a result, Jacom, Inc., respectfully requests that the present application be granted, thus permitting WQBX(FM) to continue the service on which the residents of Alma have relied for the last 50 years.

DC_DOCS:716406.6



Overlap Population Report
WQBX (284) / WQBX (285)

Overlap Area Type: Intersection
Areas Included:
Population Report for All Contours

Population Database: 2010 US Census (SF1)

	Population	Area (sq. km)
WQBX (284) [Fowler, MI]		
FCC F(50-50) 60.00 dBu (91,155	2540.8
WQBX (285) [Alma, MI]		
FCC F(50-50) 60.00 dBu (75,799	2513.2

Overlap Area
Total Population: 6,268
Overlap Area: 443.8 sq. km



ALMA COLLEGE

ONLY ONE ALMA.

March 13, 2014

Federal Communications Commission
445 12th Street. SW
Washington, DC 20554

Dear Commissioners,

This letter is being written to support the petition by WQBX-FM 104.9, to move their license to operate in the city of Alma, Michigan.

Alma College station WQAC is a student-run, low-power station that does not provide the full community service offerings that WQBX-FM can. It gives students a chance to be on-air as DJs, trains them to use the equipment, and gives them the freedom to create their own shows. The station's audience is Alma College students who live on the 128-acre campus, and the station's signal reach is very weak beyond the campus boundaries. The station does not cover Alma community news or events beyond the campus, nor does the station interact with the community. Our station serves as primarily an academic training ground for students considering a radio broadcast career.

We do not feel there will be any adverse impact to our station by approving the petition by WQBX. Indeed, the presence of WQBX-FM 104.9 in Alma will complement our station and provide important community news and outreach resources for our students.

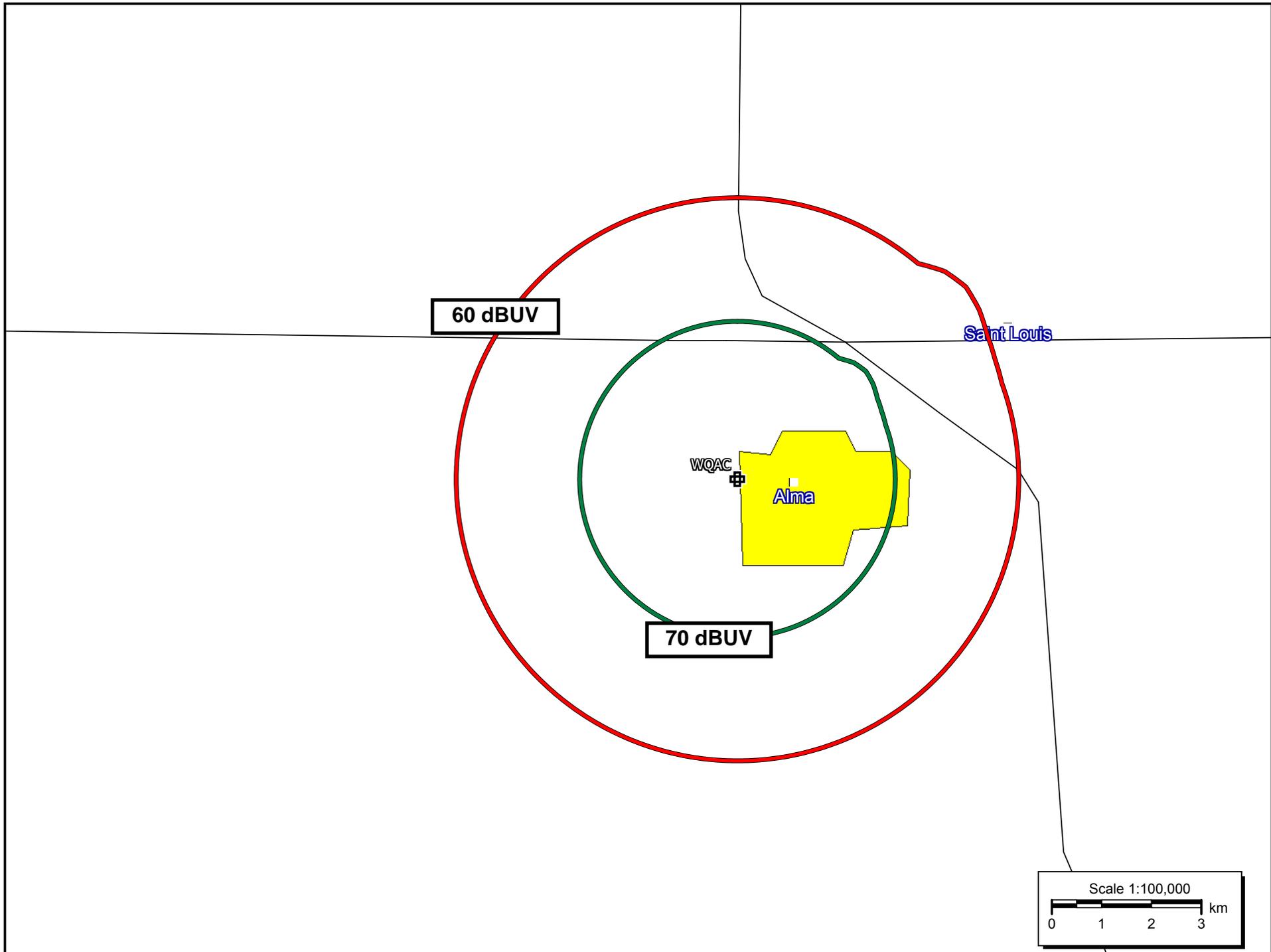
Thank you.

David V. Buhl
VP - Business Affairs
Alma College
989-463-7143

VICE PRESIDENT OF BUSINESS AFFAIRS

614 West Superior Street, Alma, Michigan 48801-1599 Telephone (989) 463-7143 Fax (989) 463-7094

WWW.ALMA.EDU



60 dBUV

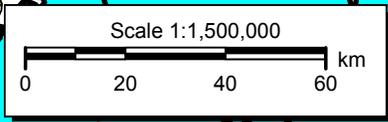
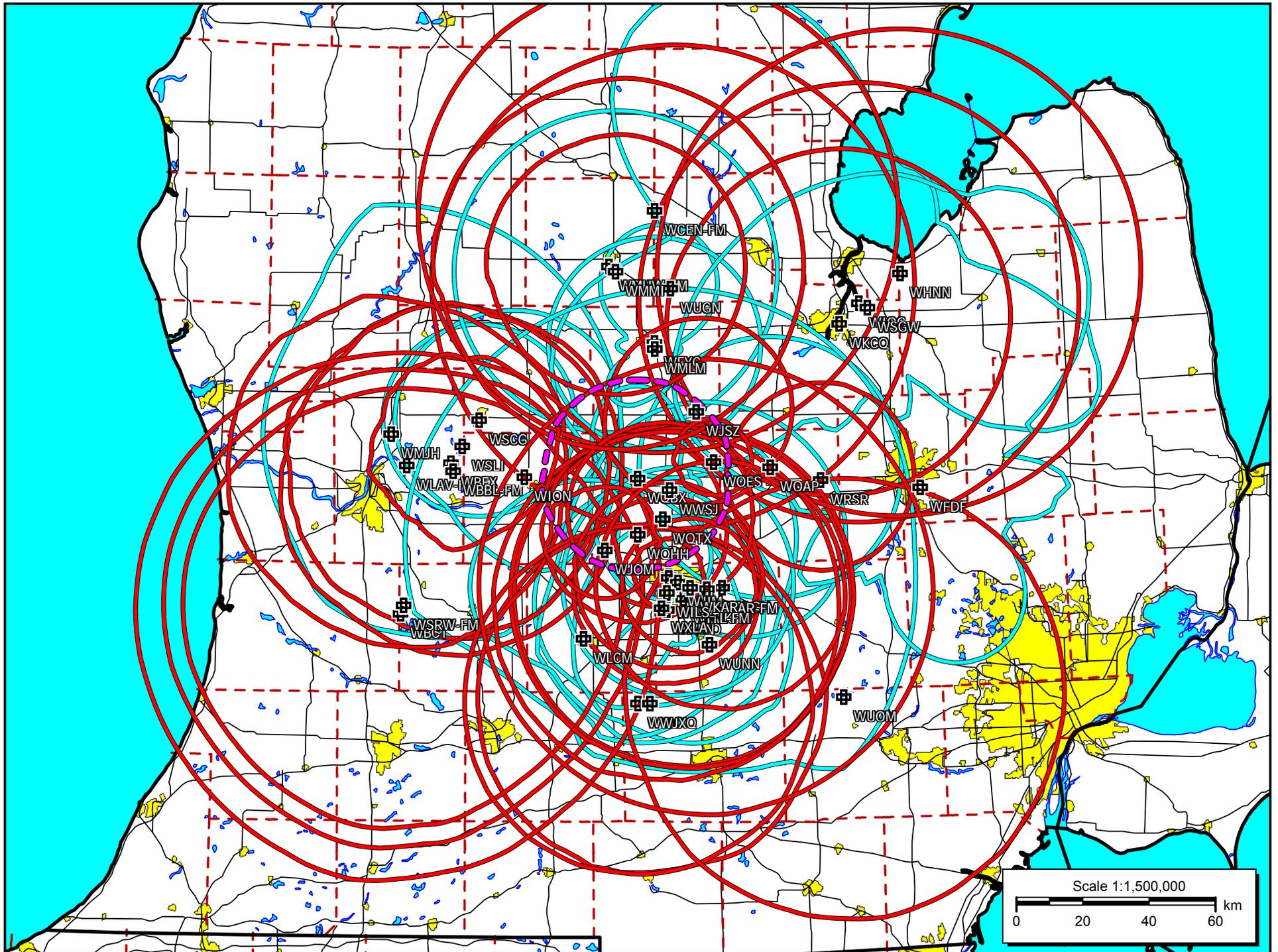
Saint Louis

WQAC

Alma

70 dBUV





Total number of overlapping contours: 51

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WLGH	FM	201B1	Leroy Township	MI	BLLED20050906AAN	41.5	142.2
WJOM	FM	203A	Eagle	MI	BLLED20060427AFG	23.8	204.5
WDBM	FM	205A	East Lansing	MI	BLLED19890123KJ	36.5	154.3
WCMU-FM	FM	208C1	Mount Pleasant	MI	BLLED20140121MLX	64.4	352.3
WLNZ	FM	209A	Lansing	MI	BLLED20131127BHJ	30.8	162.2
WKAR-FM	FM	213B	East Lansing	MI	BLLED20110817ACF	39.3	147.9
WSLI	FM	215B1	Belding	MI	BLLED20110107AEQ	53.7	280.4
WOES	FM	217A	Ovid-elsie	MI	BLLED19810917AB	23.4	77.9
WMHW-FM	FM	218C3	Mount Pleasant	MI	BLLED20100507ACW	64.4	352.3
WUOM	FM	219B	Ann Arbor	MI	BLLED19990204KA	90.4	136.6
WQTX	FM	221A	St. Johns	MI	BLH20120119ACV	14.4	148.2
WJSZ	FM	223A	Ashley	MI	BLH20101130ANC	26.7	41.3
WLMI	FM	225A	Grand Ledge	MI	BLH20071119AEL	31.3	162.6
WBCT	FM	229B	Grand Rapids	MI	BLH19800616AK	82.1	240.3
WVIC	FM	231B	Jackson	MI	BLH19830711AJ	67.7	179.9
WCEN-FM	FM	233C1	Hemlock	MI	BMLH20041124AGB	80.7	3.6
WMMQ	FM	235B	East Lansing	MI	BLH19911106KF	40.5	167.4
WHNN	FM	241C0	Bay City	MI	BLH19920211KB	100.3	52.0
WQHH	FM	243A	Dewitt	MI	BLH20030331ALN	16.9	179.9
WLAV-FM	FM	245B	Grand Rapids	MI	BLH19940822KC	69.6	273.2
WJIM-FM	FM	248B	Lansing	MI	BLH19971226KC	38.7	159.2
WKCQ	FM	251B	Saginaw	MI	BMLH20100823ABD	76.5	52.6
WFMK	FM	256B	East Lansing	MI	BLH19870605KA	38.7	159.2
WUGN	FM	259C	Midland	MI	BLLED20130702ABR	58.0	9.8
WITL-FM	FM	264B	Lansing	MI	BLH19850610KF	38.7	159.2
WBFX	FM	267B	Grand Rapids	MI	BMLH20130607ABB	56.4	274.7
WHZZ	FM	269A	Lansing	MI	BLH19990811KD	35.6	165.3
WIOG	FM	273B	Bay City	MI	BLH19850207KK	85.0	51.6
WRSR	FM	280A	Owosso	MI	BLH19960111KR	55.1	90.5
WVGR	FM	281B	Grand Rapids	MI	BMLED20080306ABQ	80.1	241.5
WSRW-FM	FM	289B	Grand Rapids	MI	BLH20071129AJD	80.1	241.6
WJXQ	FM	291B	Charlotte	MI	BLH20060103ABP	67.8	176.8
WBBL-FM	FM	297B	Greenville	MI	BLH19891122KB	55.6	272.3
WFDF	AM	910	FLINT	MI	BL	85.1	91.8
WJIM	AM	1240	LANSING	MI	BL19971226KA	33.6	158.8
WKAR	AM	870	EAST LANSING	MI	BL	36.5	154.3
WLCM	AM	1390	CHARLOTTE	MI	BL	50.9	198.6
WVFN	AM	730	EAST LANSING	MI	BL19930420AA	40.5	167.5
WILS	AM	1320	LANSING	MI	BL	35.5	165.6
WUNN	AM	1110	MASON	MI	BL	54.5	156.6
WWSJ	AM	1580	ST. JOHNS	MI	BL	10.3	109.7
WXLA	AM	1180	DIMONDALE	MI	BL19880311AF	39.7	169.6
WSGW	AM	790	SAGINAW	MI	BL	86.2	53.4
WOAP	AM	1080	OWOSSO	MI	BL19970124AG	40.1	85.2
WFYC	AM	1280	ALMA	MI	BL20031105AJE	41.1	7.1
WMLM	AM	1520	ST. LOUIS	MI	BL19831109AH	39.3	7.6
WMMI	AM	830	SHEPHERD	MI	BL19870210AB	62.6	353.9
WMJH	AM	810	ROCKFORD	MI	BL19960625AF	75.4	280.2
WION	AM	1430	IONIA	MI	BL	34.1	270.7
WSCG	AM	1380	GREENVILLE	MI	BL20030122AGC	50.8	290.2

Distance and bearing calculations from coordinates: 43-00-06 N, 084-40-05 W

Duopoly Options:

TV: Not Included

FM: 1.0 mV/m (60 dBu); Include NCE

AM: 2.0 mV/m

Stations more than 92 km from the common area were excluded.

Total number of overlapping contours: 46

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WEJC	FM	202C1	White Star	MI	BLEDD20070905AAE	55.5	49.2
WLKB	FM	206C2	Bay City	MI	BLEDD20061222AAS	54.9	66.8
WCMU-FM	FM	208C1	Mount Pleasant	MI	BLEDD20140121MLX	26.8	329.2
WKAR-FM	FM	213B	East Lansing	MI	BLEDD20110817ACF	75.7	168.0
WBHL	FM	214C3	Harrison	MI	BLEDD20121003ACR	65.2	3.9
WQAC	FM	215A	Alma	MI	BLEDD19930402KA	5.7	282.0
WOES	FM	217A	Ovid-elsie	MI	BLEDD19810917AB	40.1	153.7
WMHW-FM	FM	218C3	Mount Pleasant	MI	BLEDD20100507ACW	26.8	329.2
WQTX	FM	221A	St. Johns	MI	BLH20120119ACV	53.1	177.4
WJSZ	FM	223A	Ashley	MI	BLH20101130ANC	24.2	148.8
WKQZ	FM	227C2	Midland	MI	BLH19881027KB	67.3	37.8
WCEN-FM	FM	233C1	Hemlock	MI	BMLH20041124AGB	39.7	0.1
WMMQ	FM	235B	East Lansing	MI	BLH19911106KF	80.4	177.4
WCFX	FM	237A	Clare	MI	BMLH19901227KB	44.7	339.2
WHNN	FM	241C0	Bay City	MI	BLH19920211KB	76.8	74.3
WJIM-FM	FM	248B	Lansing	MI	BLH19971226KC	77.5	173.6
WMRX-FM	FM	249A	Beaverton	MI	BMLH19960717KB	58.0	6.1
WKCQ	FM	251B	Saginaw	MI	BMLH20100823ABD	55.9	84.2
WFMK	FM	256B	East Lansing	MI	BLH19870605KA	77.5	173.6
WUGN	FM	259C	Midland	MI	BLEDD20130702ABR	17.0	16.4
WITL-FM	FM	264B	Lansing	MI	BLH19850610KF	77.5	173.6
WBFX	FM	267B	Grand Rapids	MI	BMLH20130607ABB	71.2	239.5
WPRJ	FM	269A	Coleman	MI	BLEDD20050808ACN	50.4	13.0
WIOG	FM	273B	Bay City	MI	BLH19850207KK	62.7	79.1
WGDN-FM	FM	276C3	Gladwin	MI	BMLH20120515AAB	65.2	3.9
WCZY-FM	FM	282A	Mount Pleasant	MI	BLH19910828KB	30.6	324.8
WILZ	FM	283A	Saginaw	MI	BLH19920825KB	55.3	87.0
WGER	FM	292A	Saginaw	MI	BLH20040713AAC	54.3	77.0
WTLZ	FM	296A	Saginaw	MI	BMLH19900416KA	55.7	91.5
WBBL-FM	FM	297B	Greenville	MI	BLH19891122KB	71.9	237.6
WFDF	AM	910	FLINT	MI	BL	91.1	118.6
WKAR	AM	870	EAST LANSING	MI	BL	74.5	171.8
WVFN	AM	730	EAST LANSING	MI	BL19930420AA	80.4	177.4
WILS	AM	1320	LANSING	MI	BL	75.3	177.2
WWSJ	AM	1580	ST. JOHNS	MI	BL	44.5	174.2
WKNX	AM	1250	BAY CITY	MI	BL20040109ADK	57.3	92.8
WSAM	AM	1400	SAGINAW	MI	BL	55.9	84.3
WSGW	AM	790	SAGINAW	MI	BL	65.0	80.7
WOAP	AM	1080	OWOSSO	MI	BL19970124AG	51.1	137.1
WFYC	AM	1280	ALMA	MI	BL20031105AJE	0.0	0.0
WMLM	AM	1520	ST. LOUIS	MI	BL19831109AH	1.9	177.2
WMPX	AM	1490	MIDLAND	MI	BL	41.3	48.7
WMMI	AM	830	SHEPHERD	MI	BL19870210AB	24.4	331.4
WMJH	AM	810	ROCKFORD	MI	BL19960625AF	83.9	250.9
WION	AM	1430	IONIA	MI	BL	56.3	224.1

Distance and bearing calculations from coordinates: 43-22-08 N, 084-36-19 W

Duopoly Options:

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