

CHANGE OF COMMUNITY OF LICENSE
ONE STEP UPGRADE
MINOR CHANGE APPLICATION
NEW WAVO COMMUNICATION GROUP, INC
KVST (FM) CHANNEL 259A
TO 259C3, HUNTSVILLE, TX

City of License Change Review (307(b) Analysis)

This application by New Wavo Communication Group, Inc. (New Wavo) seeks to relocate, change from 259A to 259C3, and change community of license from Willis, TX to Huntsville, TX. Because the fully spaced reference coordinates for 259C3 operation will require a northerly shift of the fully spaced allotment coordinates, and because the shift will prevent the serving of Willis from the fully spaced reference coordinates as prescribed in FCC rule 73.3573(g)(4), (although Willis will be served with over 70dBu from the actual operating location), and since Willis is served currently only by KVST, New Wavo has entered into an agreement for KAFR (202C1) to re-license from Conroe to Willis, TX. Conroe will continue to be served by three other primary stations.

The following is a review of the proposed changes which demonstrate compliance with the Commission's rules, policies, and procedures for such changes.

As indicated in Exhibit A in the engineering narrative, Channel 259C3 at the proposed allocation coordinate site for Huntsville, TX meets the Commission's minimum separation requirements to all other licensed, applied for or proposed facilities pursuant to §73.207¹. The proposed allotment of 259C3 at Huntsville, TX is mutually exclusive the licensed KVST 259A facility at Willis, TX.

¹ New Wavo has acquired the NEW allotment at Cuney, TX (259A) and has received a CP to locate that facility in a northerly direction, thus opening the fully spaced C3 reference coordinates for KVST.

New Wavo Proposes the following changes:

Conroe

Present 202C1, 295C, KJOZ (AM), KYOK (AM)

Proposed 295C, KJOZ (AM), KYOK (AM)

Willis, TX

Present 259A

Proposed 202C1

Huntsville, TX

Present 213A, 269A, KHCH (AM), KHVL (AM)

Proposed 213A, 259C3, 269A, KHCH (AM), KHVL (AM)

Gain / Loss Services

As shown in Exhibits D1 and D2, there are a plethora of services which provide service to both the 259A Willis Loss area (36FM, 4AM) and the Huntsville Gain area (36FM, 4AM). There is no significant change to the number of services and since the loss area is contained within the gain area, no loss of service overall. There is no portion of the loss area which will decrease service to the level of five or less stations. There are no areas which would be considered either white or gray, and the entire gain area receives service from a minimum of five primary FM and AM services currently.

Exhibit E1 demonstrates the gain and loss the KVST 259A Construction Permit (BPH-20140702ABY) compared with the proposed 259C3 facility. Exhibit E2 examines the gain and loss for the KVST 259A Licensed facility with the proposed facility.

Urbanized Area

The relocation of KVST will provide no 70dBu service to any portion of any Urbanized Area.

This application proposes to operate KVST per 73.215 contour protection. There is no scenario under which the upgraded KVST would be able to provide 70dBu service to any urbanized areas.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direct supervision, and that they are true and correct to the best of his knowledge and belief.

A handwritten signature in cursive script, appearing to read "Bertram S. Goldman".

Bertram S. Goldman
Goldman Engineering Management, LLC
1511 Radcliffe Way, Auburn, CA. 95603
214-395-5067

EXHIBIT D1

Existing Protected Services to KVST Licensed (Loss Area)

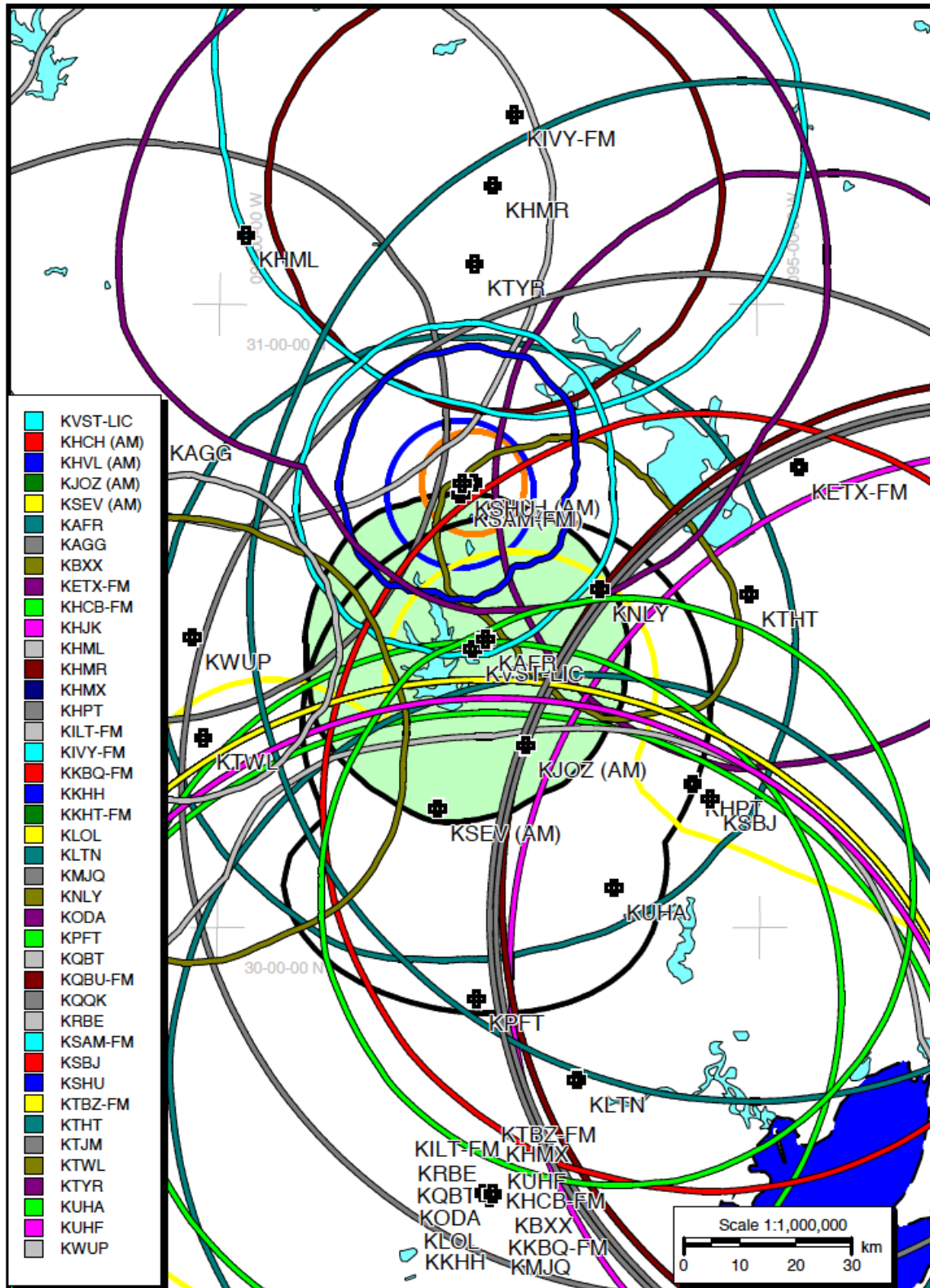


EXHIBIT D2

Existing Protected Services to KVST Proposed (Gain Area)

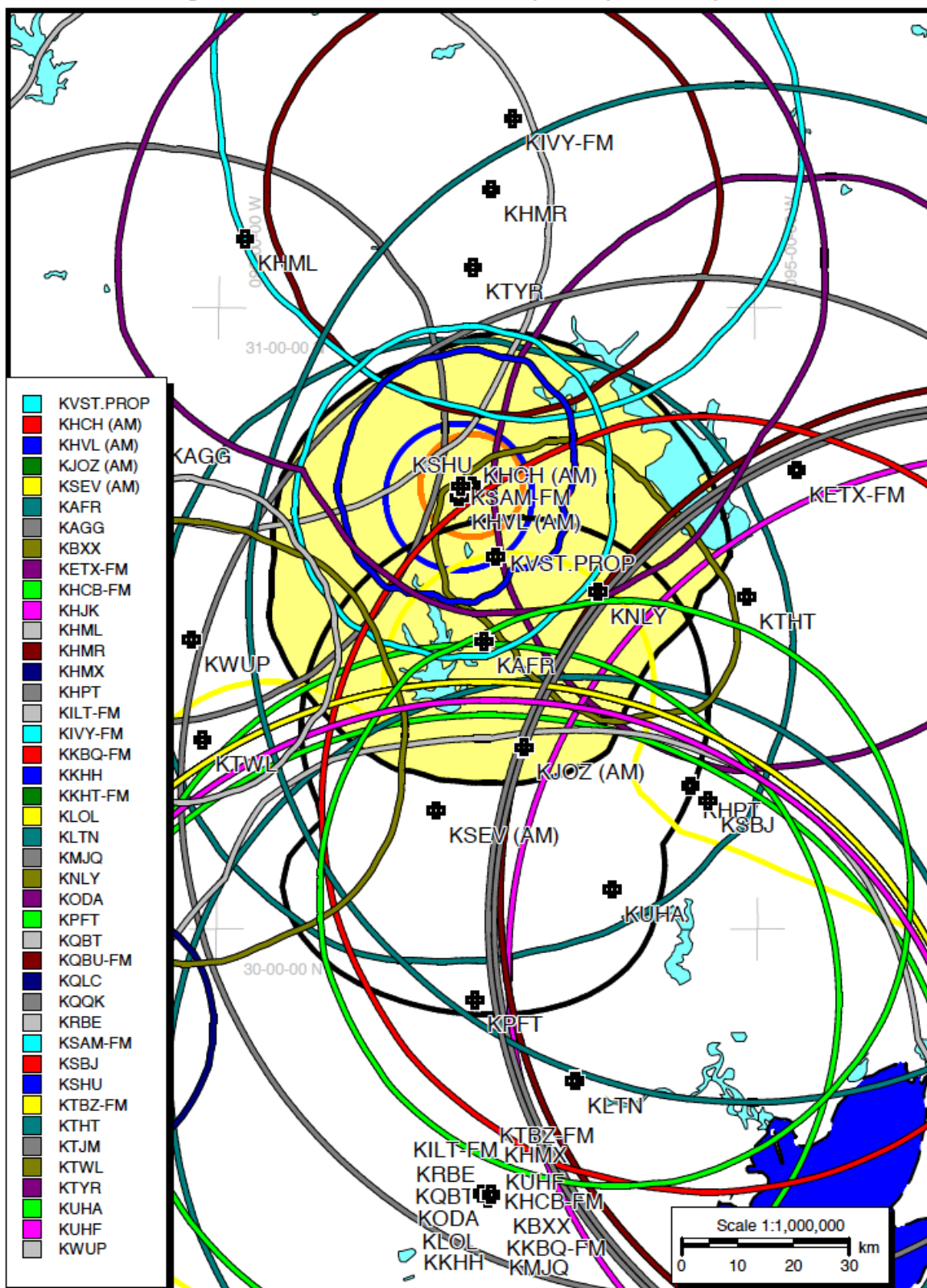


EXHIBIT E1- KVST 259A(CP) VS. KVST 259C3 PROPOSED GAIN/ LOSS

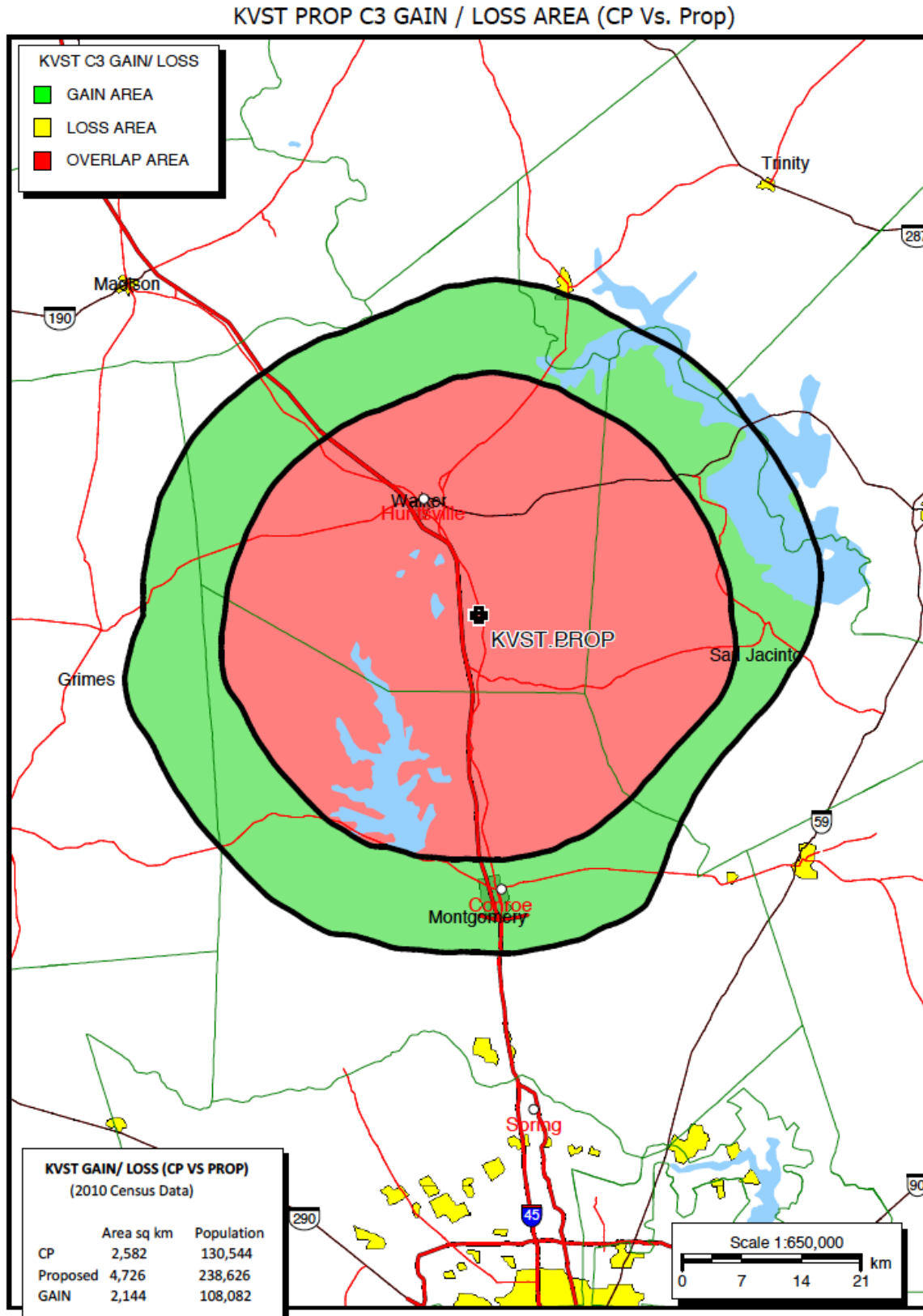


EXHIBIT E2- KVST 259A(LIC) VS. KVST 259C3 PROPOSED GAIN/ LOSS

