

Technical Narrative

This Technical Statement and attached exhibits were prepared on behalf of JMRW, LLC (“JMRW”), licensee of station WQUD, Channel 288A (105.5 MHz), Facility ID No. 166073, Erie, Illinois. JMRW herein proposes to modify the license of WQUD to specify operation on Channel 299A (107.7 MHz) from a different transmitter site and continue to be licensed to Erie, Illinois.

Three changes to the FM Spectrum are proposed. A minor change application involves a site change and channel change for station WQUD. The second change is a request for an Order to Show Cause to change the operating frequency of WSSQ, Facility ID No. 37208, Sterling, Illinois. The third change is a request for an Order to Show Cause to change the operating frequency of WLLT, Facility ID No. 59235, Polo, Illinois. Section 316(a) of the Communications Act of 1934, as amended,¹ permits the FCC to modify the license or construction permit if such action is in the public interest. The Act requires that the FCC notify the affected station of the proposed action, the public interest reasons for the action, and afford at least 30 days to respond. This procedure is now set forth in Section 1.87 of the Commission’s Rules.²

Copies of the FCC Form 301 minor modification application and all attachments were mailed to the addresses listed in CDBS for Withers Broadcasting Company of Rock River, LLC, licensee of WSSQ, and Sauk Valley Broadcasting Company, licensee of WLLT, immediately upon the

¹47 U.S.C. § 316(a) (the “Act”).

² See *Modification of FM and Television Licenses Pursuant to Section 316 of the Communications Act*, 2 FCC Rcd 3327 (1987).

filing of this minor modification application. As noted, copies of this proposal have been served on WSSQ and WLLT. JMRW, LLC hereby commits to reimburse the licensees of the two affected stations per the FCC's Circleville³ policy, which requires that, whenever an existing station is ordered to change frequency to accommodate another station, the benefiting station must reimburse the affected station for its reasonable and prudent expenses.

By the reassignment of the frequency of FM station WSSQ, Sterling, Illinois, from Channel 232A (94.3 MHz) to Channel 288A (105.5 MHz), and reassignment of the frequency of FM station WLLT Polo, Illinois, from Channel 299A (107.7 MHz) to Channel 232A (94.3 MHz), it is possible for WQUD to increase the population served in its FCC F(50,50) 60 dBu protected contour from 81,907 persons to 127,109 persons (2010 US Census). The 45,202 persons receiving an additional local service is in the public interest.

The proposal is described in its entirety for the convenience of the FCC staff but the actual requests are made by the application itself.

Modification of WQUD Channel 288A Erie, Illinois

JMRW seeks to modify WQUD Channel 288A, Erie, Illinois from Channel 288A (105.5 MHz) to Channel 299A (107.7 MHz) and relocate a to a new transmitter site. The proposed WQUD Channel 299A Reference Site coordinates are 41° 39' 31" North Latitude 90° 04' 52" West Longitude (NAD 27). The proposed WQUD application site is located at 41° 35' 17.9" North

³See Circleville, Ohio, Second Report and Order, 8 FCC 2d 159 (1967)

Latitude 90° 12' 42.6" West Longitude (NAD 27). This modification is also compliant with all the requirements of 47CFR §73.207 and 47CFR §73.315.

JMRW is proposing to implement this change at an existing communications site. The tower is 293.9 ft. (89.6 m) in overall height tower is registered with FCC Antenna Structure Registration No. 1208311. The proposed WQUD application site is short spaced to KFMW Channel 300C, licensed to Waterloo, Iowa by 2.0 km. WQUD requests Section 73.215 contour protection with respect to KFMW.

JMRW requests an Order to Show Cause for WSSQ, Facility ID No. 37208, Sterling, Illinois, to change to channel 288A (105.5 MHz) and an Order to Show cause for WLLT, Facility ID No. 59235, Polo, Illinois to change to Channel 232A (94.3 MHz). JMRW has included as exhibits Class A FM Channel Studies from the licensed sites for the proposed new frequencies for both WSSQ and WLLT. Those studies show that proposed frequencies are fully spaced to all full power FM stations when the requested channel substitutions are made. The WQUD Channel 299A reference site hypothetical 70 dBu contour covers 100% of the Erie, Illinois, corporate boundaries. The FCC F(50,50) 70 dBu contour from the proposed WQUD application site also covers 100% of the Erie, Illinois, corporate boundaries. The proposed WQUD Channel 299A facility would serve within the FCC F(50,50) 60 dBu protected contour an area of 2,086.2 sq. km. and 127,109 persons.