

Engineering Statement in Support of Change to the Community of License

Introduction

Educational Media Foundation requests a community of license change for KLVA from Maricopa, AZ to Avondale, AZ.

This statement is included to show that the proposed move will comply with the 307(b) fair distribution guidelines.

Discussion

This proposed community of license change would result in a preferential arrangement of allotments under section 307(b). Some of the factors leading to this determination are set forth below.

1. Minimum Requirements

:

- Since new technical facilities are proposed, the population and area for the new facility are as follows: the 70 dBu contour will contain 1,103,786 persons and 3042.7 sq. km. and the 60 dBu contour will contain 3,395,990 persons and 8698.4 sq. km. area. This represents an increase in the population served by the 60 dbu contour of KLVA of approximately 1,434,116 persons.
- As this application represents a move of a station located in one urbanized area (Casa Grande) to another, Avondale/Goodyear¹, no *Tuck* showing is required for this application. See, *Letter to Cumulus Licensing LLC Goleta and Santa Barbara, California*, DA 11-1460, 1800B3-AJR (Chief, Audio Division, August 26, 2011). Each urbanized area receives service from a multiplicity of radio services that cover the majority of the urbanized area.
- The number of stations providing service to the current community of license is approximately 55. The number of stations that provide protected service to the proposed community is approximately 51.
- The population of the proposed community is 76,238, according to the 2010 U.S. Census data.
- Description of the civic, cultural, religious, social and commercial attributes of the proposed community of license. The proposed city of Avondale, AZ is a licensable community as shown in Exhibit 25-H.

2. Other Relevant Information

¹ In connection with this application as initially filed, the Commission in a letter dated November 24, 2017 suggested that the move of KLVA to Avondale represented a move to the Phoenix/Mesa Urbanized area. In fact, Avondale is part of another Urbanized Area, Avondale/Goodyear. Many stations in the area also serve the Phoenix/Mesa Urbanized area, which is adjacent to the Avondale/Goodyear Urbanized Area. The Casa Grande Urbanized area is also in close proximity to the Phoenix/Mesa area, resulting in a many radio services being available throughout all three Urbanized areas.

A. Service Area

In order to show that the community of license that is currently served by KLVA continues to be served when the proposed move is granted, several exhibits have been attached.

- Exhibit 25-A shows all facilities that serve any portion of the current KLVA community of license area of Maricopa, AZ. See Exhibit 25-A1 for a station list along with a service count.
- Exhibit 25-B also provides a color coded showing of the number of stations that provide service within the current licensed contour of KLVA. As can be seen the entire area is well served by 5 or more stations, not including KLVA.

B. Gain/Loss

The proposed move by KLVA will make more efficient use of the FM spectrum and increase service to the public, as it will result in a vast increase in population served as illustrated by the exhibits below:

- Exhibit 25-C is a population report of the licensed facility for KLVA. As can be seen, the current facility serves an area of 8892.4 sq. km and a population of 1,961,874 persons.
- Exhibit 25-D is a population report of the proposed KLVA facility. As can be seen, the proposed facility serves an area of 8698.4 sq. km and a population of 3,395,990 persons.
- Exhibit 25-E is a population report of the area that is served by both the licensed and the proposed KLVA facilities. As can be seen, the shared area is 223 sq. km and the shared population is 1,610,207 persons
- Therefore, although there is an overall loss of 2.18% (194 sq. km) of the area served, the population served increases by 73.10% (1,434,116 persons).

As this proposal will result in a substantial increase in the population served by KLVA, this proposal merits adoption under Priority 4 of the Commission's allocation priorities. Thus, this application should be granted.

Respectfully submitted,

Educational Media Foundation

Exhibit 25

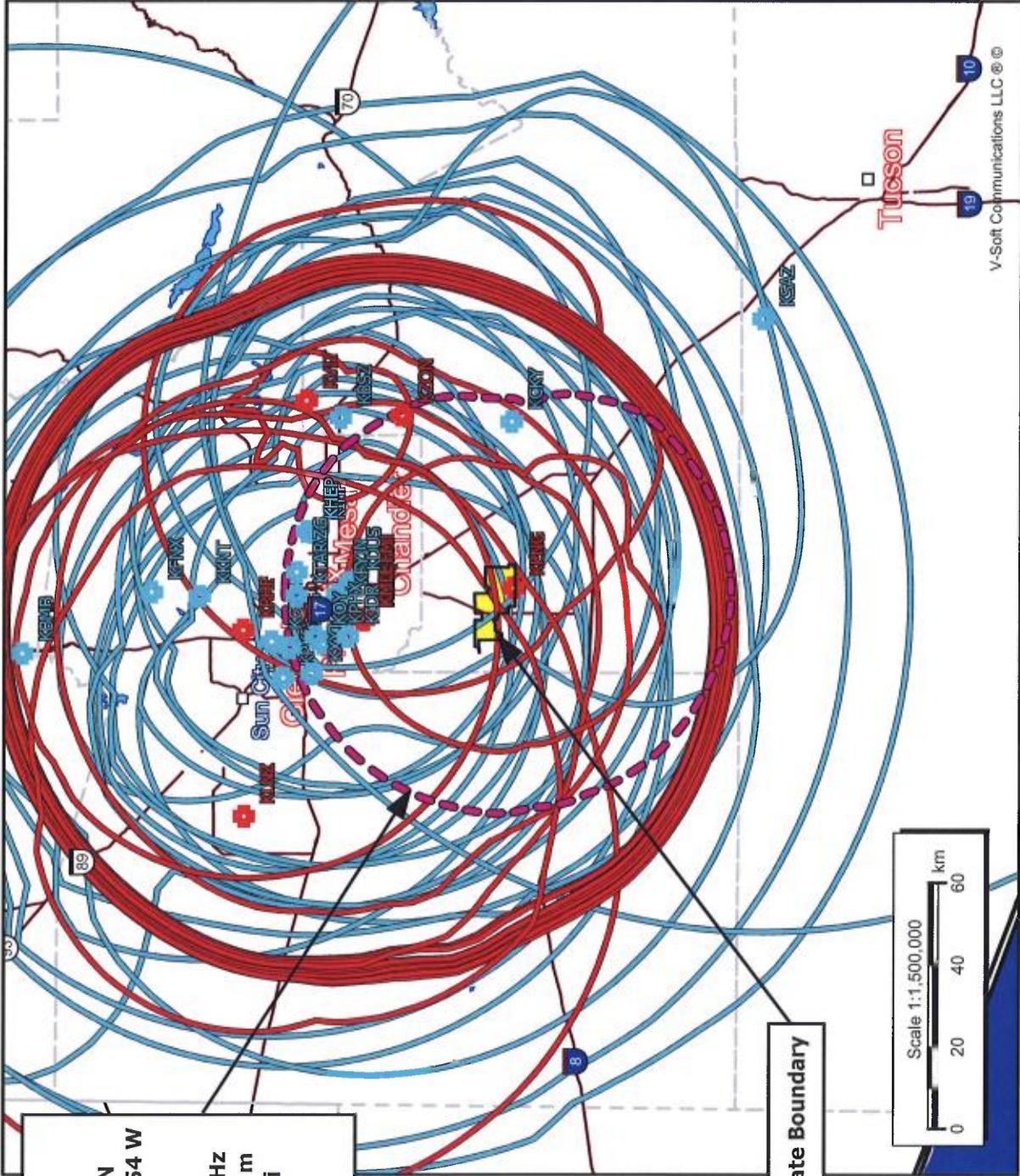
5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

James L Travis
Signal Development
Educational Media Foundation
December 21, 2017

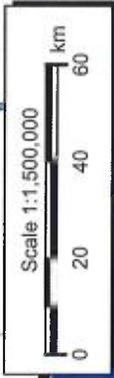
**Exhibit 25-A
Maricopa, AZ Number of Service Contours**

Blue Contours - 2mv/m Daytime
Red Contours - 60dbu(F50-50)

KLVA
 BLED20160407AAC
 Latitude: 33-00-14 N
 Longitude: 111-58-54 W
 ERP: 50.00 kW
 Channel: 288
 Frequency: 105.5 MHz
 AMSL Height: 541.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None



Yellow Area - Maricopa Corporate Boundary



Service Count Report

Service count area for Maricopa, AZ

Service Count Population Report - Service Count: KLVA (288): FCC F(50-50) 60.00
 dBu (FCC HAAT)

Reference Area: KLVA (288): FCC F(50-50) 60.00 dBu (FCC HAAT)
 Counting Grid Cell Size: 0.5 sq. km
 Population Database: 2010 US Census (PL)

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	0	0	0.00
4 Service	0	0	0.00
5 or more	1,959,697	802,459	8894.93
Reference Area	1,959,697	802,459	8894.93

Total number of overlapping contours: 45

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KLVA	FM	288C2 Maricopa	AZ	BLED20160407AAC	0.0	0.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KNAI	FM	202C1 Phoenix	AZ	BLED19920121KC	66.5	351.2
KPHF	FM	202C1 Phoenix	AZ	BLED19990716KB	66.5	351.1
KPNG	FM	204C3 Chandler	AZ	BLED20150812AAS	0.0	90.0
KLVK	FM	206C0 Fountain Hills	AZ	BLED20100720AIX	85.8	319.7
KBAQ	FM	208C1 Phoenix	AZ	BLED20100721HZP	37.3	348.0
KFLR-FM	FM	212C Phoenix	AZ	BLED20070912ABQ	37.4	348.4
KVIT	FM	214A Apache Junction	AZ	BLED20110211ABB	68.0	42.1
KJZZ	FM	218C Phoenix	AZ	BLED20090127ACM	37.3	348.0
KTAR-FM	FM	222C Glendale	AZ	BLH20040707ABM	37.3	348.2
KDKB	FM	227C Mesa	AZ	BLH20101116AIX	37.3	348.4
KOOL-FM	FM	233C Phoenix	AZ	BMLH20021018AAD	37.4	348.5
KYOT-FM	FM	238C Phoenix	AZ	BMLH19950925KC	37.5	348.7
KMXP	FM	245C Phoenix	AZ	BMLH19941024KC	37.4	348.7
KUPD	FM	250C Tempe	AZ	BMLH20130820ABM	37.3	348.0
KMVP-FM	FM	254C Phoenix	AZ	BMLH20040707ABN	37.3	348.2
KESZ	FM	260C Phoenix	AZ	BLH19970324KD	37.3	348.4
KSLX-FM	FM	264C Scottsdale	AZ	BMLH20130726AAJ	37.1	348.2
KALV-FM	FM	268C Phoenix	AZ	BLH6108	37.1	348.2
KNIX-FM	FM	273C Phoenix	AZ	BMLH19870814KA	37.3	348.0
KLNZ	FM	278C Glendale	AZ	BMLH19980406KB	85.8	319.7

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Exhibit 25-A1
Maricopa, AZ

KZON	FM	280C1 Gilbert	AZ	BLH20040831ACE	50.0	57.2
KZZP	FM	284C Mesa	AZ	BLH6100	37.4	348.8
KMLE	FM	300C Chandler	AZ	BLH19881103KA	37.4	348.5
KSAZ	AM	580 MARANA	AZ	BL20010418ABK	89.5	132.9
KSUN	AM	1400 PHOENIX	AZ	BL	42.8	358.0
KCKY	AM	1150 COOLIDGE	AZ	BL19840709AD	40.5	89.3
KBSZ	AM	1260 APACHE JUNCTION	AZ	BL20121211ACR	59.1	44.6
KIHP	AM	1310 MESA	AZ	BML20091216AFV	50.2	15.7
KDUS	AM	1060 TEMPE	AZ	BL19920922AD	39.7	1.9
KHEP	AM	1580 TEMPE	AZ	BLRB1104ML	52.0	15.3
KFNX	AM	1100 CAVE CREEK	AZ	BL19970613AV	88.1	359.4
KAZG	AM	1440 SCOTTSDALE	AZ	BL19940707AB	52.8	4.2
KMVP	AM	860 PHOENIX	AZ	BMML20100723AVO	48.2	343.7
KFYI	AM	550 PHOENIX	AZ	BL	42.7	356.9
KPXQ	AM	1360 GLENDALE	AZ	BMML20110811ACJ	60.0	338.6
KXEG	AM	1280 PHOENIX	AZ	BL20160401AZQ	56.2	345.0
KOY	AM	1230 PHOENIX	AZ	BL19970717AB	49.4	346.1
KKNT	AM	960 PHOENIX	AZ	BL19940802AD	76.4	358.6
KPHX	AM	1480 PHOENIX	AZ	BL19901005AD	45.5	345.1
KXXT	AM	1010 TOLLESON	AZ	BL20000815ACV	53.2	336.9
KGME	AM	910 PHOENIX	AZ	BL	60.1	347.5
KIDR	AM	740 PHOENIX	AZ	BL	41.8	343.6
KTAR	AM	620 PHOENIX	AZ	BMML20130718AHZ	52.7	358.0
KBMB	AM	710 BLACK CANYON CITY	AZ	BMML20090608ADP	120.4	352.4

Distance and bearing calculations from coordinates: 33-00-14 N, 111-58-54 W

Duopoly Options:

TV: Not Included

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

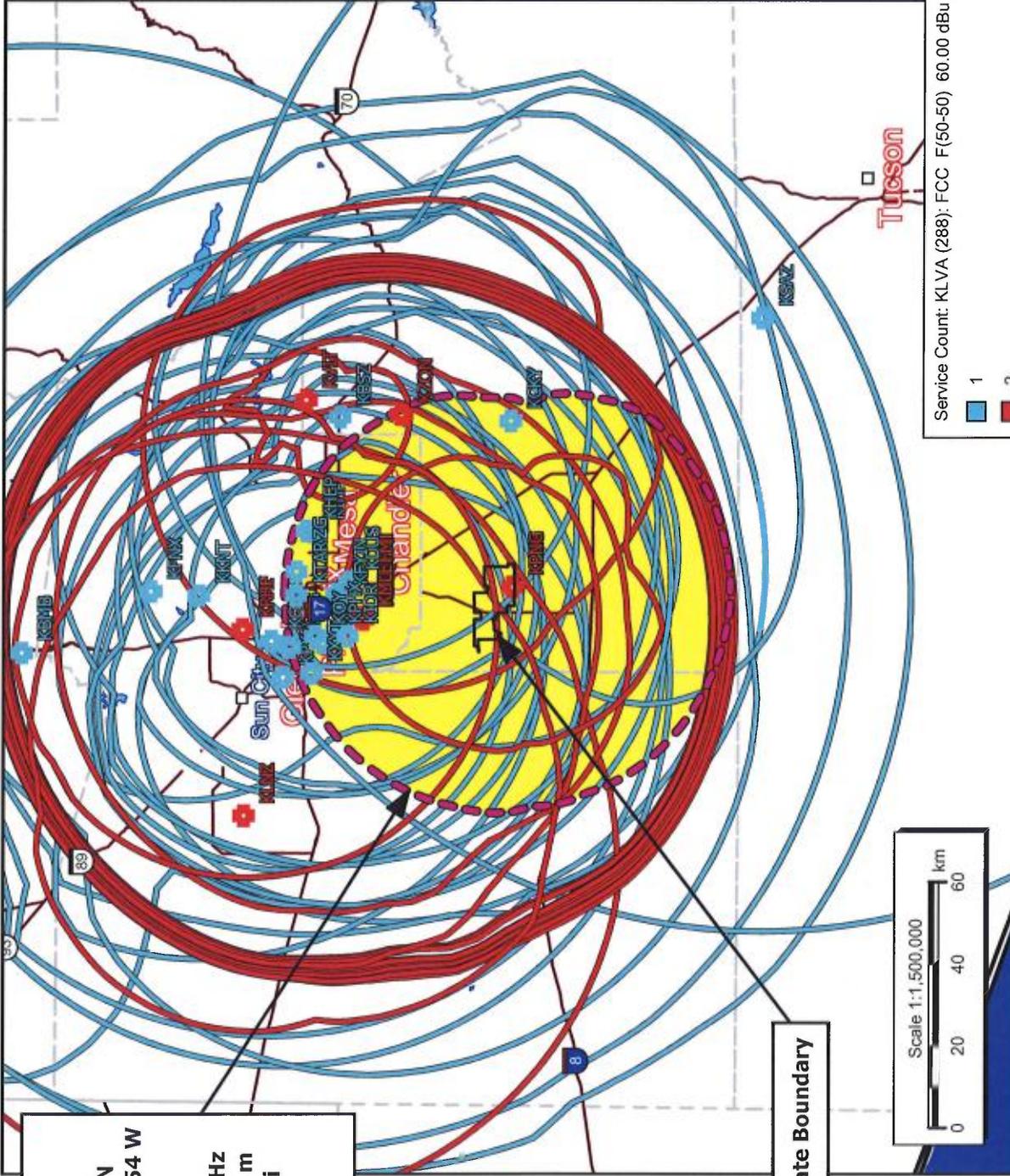
AM: 2.0 mV/m

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

Blue Contours - 2mv/m Daytime
 Red Contours - 60dbu(F50-50)

Exhibit 25-B Maricopa, AZ Number of Service Contours

KLVA
 BLED20160407AAC
 Latitude: 33-00-14 N
 Longitude: 111-58-54 W
 ERP: 50.00 kW
 Channel: 288
 Frequency: 105.5 MHz
 AMSL Height: 541.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None



Service Count: KLVA (288): FCC F(50-50) 60.00 dBu (FCC HAAT)

- 1
- 2
- 3
- 4
- 5 or more

Maricopa Corporate Boundary



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Exhibit 25-C
Avondale, AZ

Population Report for KLVA Licensed

Population Report

Station: KLVA (288)
Contour: FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 1,961,874
Housing Units: 803,644
Coverage Area: 8,892.4 sq. km

Call Letters: KLVA
File Number: BLED20160407AAC
Latitude: 33-00-14 N
Longitude: 111-58-54 W
ERP: 50.00 kW
Channel: 288
Frequency: 105.5 MHz
AMSL Height: 541.0 m
Elevation: 374.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

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Exhibit 25-D
Avondale, AZ

Population Report for KLVA Proposed

Population Report

Station: KLVA.P (288)
Contour: FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 3,395,990
Housing Units: 1,432,544
Coverage Area: 8,698.4 sq. km

Transmitter Information:

Call Letters: KLVA.P
Latitude: 33-16-24.10 N
Longitude: 112-16-48 W
ERP: 0.80 kW
Channel: 288
Frequency: 105.5 MHz
AMSL Height: 1383.0 m
Elevation: 1375.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Overlap Population Report for KLVA Licensed and Proposed

Overlap Population Report
KLVA (288) / KLVA.P (288)

Overlap Area Type: Intersection
Areas Included:

KLVA (288): FCC F(50-50) 60.00 dBu (FCC HAAT)
KLVA.P (288): FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 1,610,207
Housing Units: 656,038
Overlap Area: 4,644 sq. km

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
KLVA (288): FCC F(50-50)	1,961,874	8,892	82.1 %	52.2 %
KLVA.P (288): FCC F(50-50)	3,395,990	8,698	47.4 %	53.4 %

Avondale, AZ

Avondale is a *bona fide* community for allotment purposes. Avondale is a census designated place ("CDP") with a 2010 population of 76,238. Avondale continues to maintain relevant residential, social and business characteristics.

Avondale has its own elected government, which consists of a Mayor and Six Councilmembers. Avondale also has a City Manager, Clerk, Development and Engineering Services which include the Planning Commission and Zoning Board of Appeals.

Avondale has its own Post Office and U.S. Postal Service Zip Codes (85323 and 85392).

Avondale has numerous businesses and commercial establishments within its borders, as well as a number of churches.

Estrella Mountain Community College and Westview High School are located in Avondale.

Avondale has two public libraries, Avondale Civic Center Library and the Sam Garcia Western Avenue Library. Avondale has its own fire department and police department. There are 10 city parks located within Avondale. There is also a Civic Center and a Community Center.

For more information on the City of Avondale visit <http://www.avondale.org/>