

October 2012
KACS(FM) Channel 213C3
Rainier, Washington
Section 307(b) Analysis Engineering

By the instant minor change application, it is proposed to modify the license for FM station KACS (Facility ID # 10685) from Channel 213A at Chehalis, Washington, to Channel 213C3 at Rainier, Washington. Unless otherwise noted, all population numbers are from the 2010 Census.

Allocation Study

The attached allocation study exhibit demonstrates that the proposed KACS facility satisfies the requirements of §73.509 (reserved channel overlap analysis), §73.207 (IF channel spacing), and §73.525 (TV Channel 6 protection), with the exception of a request for waiver of §73.509 consistent with the precedent set in *Educational Information Corporation*.

This proposal is mutually-exclusive with the existing license for KACS on Channel 213A at Chehalis and qualifies as a minor change in that the proposed facility is cochannel with the licensed facility, and there is overlap of the licensed and proposed 60 dBu contours..

First Local Service to Rainier

The attached contour map demonstrates that the proposed allotment will provide 60 dBu service to 100% of Rainier. The proposed operation will provide the first local transmission service to Rainier, an incorporated town with a 2010 Census population of 1,794 persons. Chehalis will retain local service from FM stations KSW5 Channel 205C3, New Channel 209A, and KMNT Channel 282C3; and AM stations KITI 1420 kHz (Centralia-Chehalis) and KELA 1470 kHz (Centralia-Chehalis). Therefore, the instant proposal represents a preferential arrangement of allotments under Priority 3 (first local service).

Both Chehalis and Rainier are considered to be well-served, with in excess of 5 reception services each. There are presently 12 AM and 10 FM stations which provide protected service (FM 60 dBu and AM 0.5 mV/m) service to Chehalis. There are presently 19 AM and 19 FM stations which provide protected service to Rainier.

Stations Providing Protected Service to Chehalis

| AM Stations | | | FM Stations | | |
|-------------|----------|--------------------|-------------|-------|-------------|
| KVI | 570 kHz | Seattle | KSWS | 205C3 | Chehalis |
| KIRO | 710 kHz | Seattle | KACS | 213A | Chehalis |
| KTTH | 770 kHz | Seattle | KCED | 217A | Centralia |
| KGNW | 820 kHz | Burien-Seattle | KITI-FM | 236A | Winlock |
| KHHO | 850 kHz | Tacoma | KXXO | 241C | Olympia |
| KGTK | 920 kHz | Olympia | KOMO-FM | 249C | Oakville |
| KJR | 950 kHz | Seattle | KDDS-FM | 257C | Elma |
| KOMO | 1000 kHz | Seattle | KNBQ | 275C | Centralia |
| KPTK | 1090 kHz | Seattle | KMNT | 282C3 | Chehalis |
| KBAM | 1270 kHz | Longview | KRQT | 296C3 | Castle Rock |
| KITI | 1420 kHz | Centralia-Chehalis | | | |
| KELA | 1470 kHz | Centralia-Chehalis | | | |

Stations Providing Protected Service to Rainier

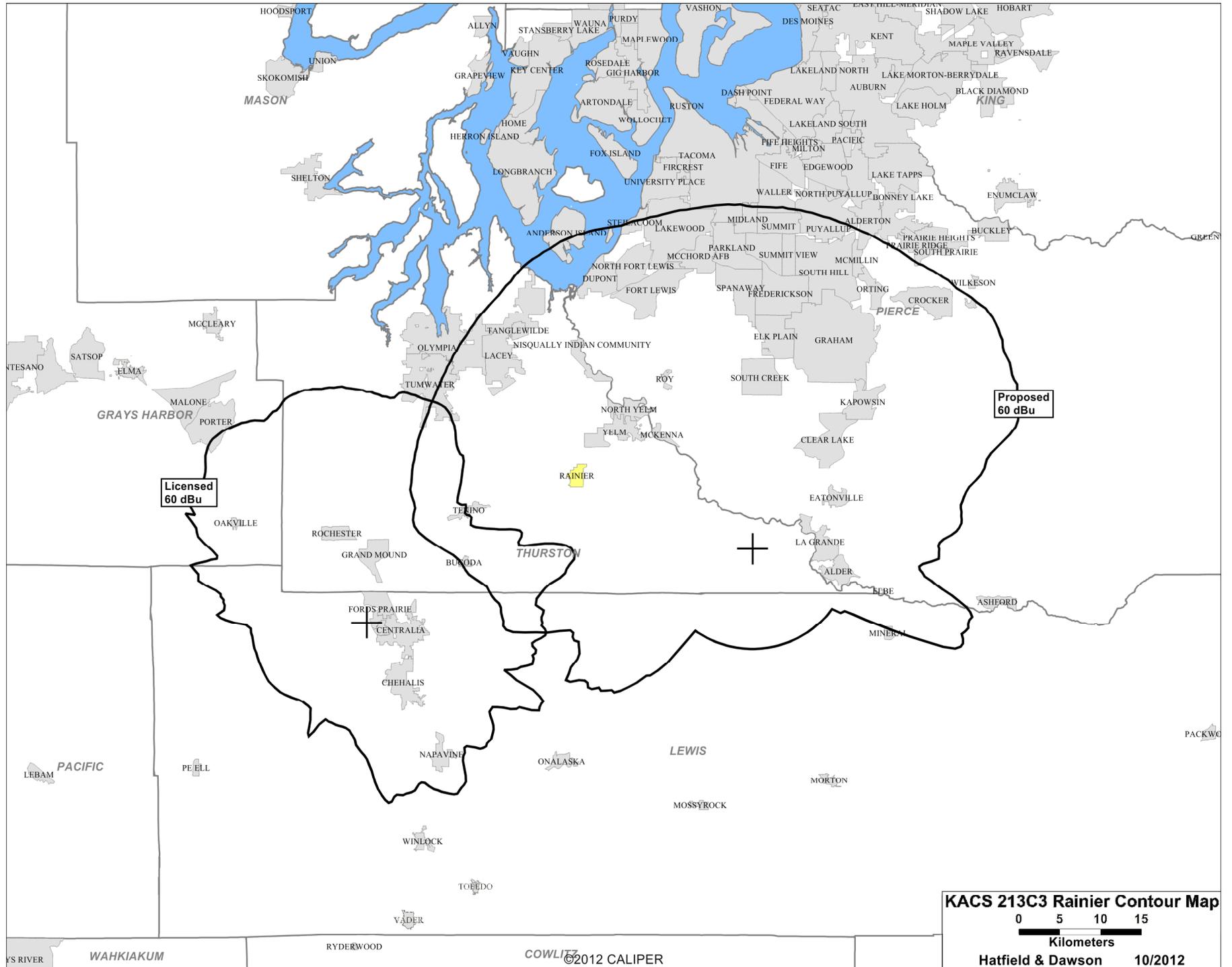
| AM Stations | | | FM Stations | | |
|-------------|----------|-----------------------|-------------|-------|------------|
| KVI | 570 kHz | Seattle | KPLU-FM | 203C | Tacoma |
| KCIS | 630 kHz | Edmonds | KVTI-FM | 215C1 | Tacoma |
| KBRD | 680 kHz | Lacey | KXOT | 219C2 | Tacoma |
| KIRO | 710 kHz | Seattle | KQMV | 223C | Bellevue |
| KTTH | 770 kHz | Seattle | KMPS-FM | 231C | Seattle |
| KGNW | 820 kHz | Burien-Seattle | KXXO | 214C | Olympia |
| KHHO | 850 kHz | Tacoma | KIRO-FM | 247C | Tacoma |
| KIXI | 880 kHz | Mercer Island/Seattle | KOMO-FM | 249C | Oakville |
| KGTK | 920 kHz | Olympia | KING-FM | 251C | Seattle |
| KJR | 950 kHz | Seattle | KLCK-FM | 255C | Seattle |
| KOMO | 1000 kHz | Seattle | KDDS-FM | 257C | Elma |
| KMAS | 1030 kHz | Shelton | KISW | 260C | Seattle |
| KPTK | 1090 kHz | Seattle | KKWF | 264C | Seattle |
| KLAY | 1180 kHz | Lakewood | KZOK-FM | 273C | Seattle |
| KGY | 1240 kHz | Olympia | KNBQ | 275C | Centralia |
| KLDY | 1280 kHz | Lacey | KMTT | 279C | Tacoma |
| KKOL | 1300 kHz | Seattle | KKBW | 285C3 | Eatonville |
| KUOW | 1340 kHz | Tumwater | KBKS-FM | 291C | Tacoma |
| KELA | 1470 kHz | Centralia-Chehalis | KNDD | 299C | Seattle |

A Tuck Analysis Is Not Necessary

It is not clear to this firm that the rules permitting the filing of a minor change application to change the community of license of a reserved band station can potentially implicate the need for a “Tuck” study to demonstrate that the new community of license is sufficiently independent of the central city of an urbanized area to qualify for a first local service preference. However, even if “Tuck” does indeed apply to reserved band community changes, a “Tuck” study would not be required in the instant case. The incorporated town of Rainier lies wholly outside any Urbanized Area, and as depicted on the attached map exhibit the 23.2 km radius circle (standard Class C3 70 dBu) from the proposed allotment site encompass only a very small portion of any nearby urbanized area, far below the 50% threshold which would trigger “Tuck”.

Gain and Loss Areas

As depicted on the attached contour map, there is some overlap of the licensed Chehalis 213A and the proposed Rainier 213C3 60 dBu service areas. The loss area associated with the proposed modification of KACS encompasses an area of 1,259 sq km and a population of 66,891 persons. The gain area encompasses an area of 2,993 sq km and a population of 504,499 persons. There will be a net gain of 1,734 sq km and 437,608 persons served.



KACS 213C3 Rainier Contour Map
 0 5 10 15
 Kilometers
 Hatfield & Dawson 10/2012

