

COMMUNITY OF LICENSE CHANGE – SECTION 307(b) SHOWING

Golden Isles Broadcasting, LLC (“Golden Isles”) seeks a minor modification of the licensed facilities of Station WSSI(FM), Darien, Georgia (Facility ID No. 36929) (“WSSI” or the “Station”) to, among other things, change the Station’s community of license from Darien to St. Simons Island, Georgia.

Simultaneously with the filing of this application, QBS Broadcasting, LLC is filing a contingent application to, among other things, change the community of license of its Station WBQO(FM), St. Simons Island, Georgia (Facility ID No. 91581) to Darien, thereby maintaining a second local service for Darien. Moreover, Darien will continue to receive ten or more full-time aural reception services.

Pursuant to 47 U.S.C. §307(b), the Commission will authorize the relocation of a facility to another community when doing so will “provide a fair, efficient and equitable distribution of radio service.” Here, the proposed technical changes that accompany the WSSI community of license change would allow service to a greater number of listeners.<sup>1</sup> The provision of broader service to the public, with the maintenance of local transmission service at St. Simons Island, would promote the public interest.<sup>2</sup>

The attached Combined §307(b) Technical Analysis demonstrates that the proposed modification of WSSI would result in a net gain of 1,886 people within the Station’s 60 dBu service contour, and 317.5 sq km in area. There would be no loss area. The FCC’s long-

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<sup>1</sup> Combined with the WBQO community of license change and facility improvements, an even greater number of listeners would be served.

<sup>2</sup> Golden Isles notes that the FCC’s “rural radio” policies do not apply here. WSSI currently serves 100% of the Brunswick, Georgia Urbanized Area and will continue to serve 100% after its community of license change.

established FM Allotment Priorities are (1) first full-time aural service, (2) second full-time aural service, (3) first local service, and (4) other public interest matters.<sup>3</sup> The proposed modification is a preferential arrangement under Priority 4.

As noted above, WBQO is currently licensed to St. Simons Island. Implicit in the Commission's licensing of WBQO to St. Simons Island was a determination that St. Simons Island meets the Section 307(b) requirements for a community of license.

The Commission has defined a "community" as a geographically identifiable population grouping.<sup>4</sup> It is sufficient that a proposed community of license be incorporated or listed in the U.S. Census to confer community status.<sup>5</sup> St. Simons Island is designated as a Census Designated Place by the Census Bureau.<sup>6</sup> The St. Simons CDP has a population of 14,982 persons.<sup>7</sup> St. Simons Island is the home of numerous historic sites,<sup>8</sup> the St. Simons Island Airport,<sup>9</sup> a United States Post Office,<sup>10</sup> the St. Simons Island Public Library,<sup>11</sup> and four schools

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<sup>3</sup> See *Revision of FM Assignment Policies and Procedures, Second Report and Order*, 90 FCC 2d 88 (1982). Co-equal weight is given to priorities (2) and (3).

<sup>4</sup> *Oak Grove, Florida*, 5 FCC Rcd 3774 (1990).

<sup>5</sup> *Id.*

<sup>6</sup> U.S. Census Bureau, St. Simons CDP Georgia, <https://www.census.gov/quickfacts/fact/table/stsimonscdpgeorgia,US/PST045221>.

<sup>7</sup> *Id.*

<sup>8</sup> Explore St. Simons Island, St. Simons Island Historic Sites, [https://www.explorestsimonsisland.com/St\\_Simons\\_History.html](https://www.explorestsimonsisland.com/St_Simons_History.html).

<sup>9</sup> St. Simons Airport at McKinnon Field, <https://www.flygcairports.com/st-simons-airport.html>

<sup>10</sup> United States Postal Service, Saint Simons Island, <https://tools.usps.com/find-location.htm?location=1436135>.

<sup>11</sup> Marshes of Glynn Libraries – St. Simons Island Public Library, <https://moglibraries.org/st-simons-public-library/>.

(Oglethorpe Point Elementary,<sup>12</sup> St. Simons Elementary,<sup>13</sup> Frederica Academy,<sup>14</sup> and St. Simons Christian School<sup>15</sup>). St. Simons Island is by all measures a community for Section 307(b) purposes.

### Conclusion

It is respectfully submitted that the proposed minor modification represents a preferential arrangement of allotments and fully satisfies Section 307(b).

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<sup>12</sup> Oglethorpe Point Elementary School, <https://oglethorpe.glynn.k12.ga.us/>.

<sup>13</sup> St. Simons Elementary School, <https://stsimons.glynn.k12.ga.us/>.

<sup>14</sup> Frederica Academy, <https://www.fredericaacademy.org/>.

<sup>15</sup> St. Simons Christian School, <https://sschristianschool.com/>.