

307(b) Showing

Metro Radio, Inc., licensee of Station WKDV(AM), submits this statement in support of its application to change the city of license from Manassas to Chantilly, Virginia. Metro Radio will demonstrate, pursuant to Section 307(b) of the Communications Act, 47 U.S.C. § 307(b), *Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, 21 FCC Rcd 14212, ¶ 10 (2006) and *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, 26 FCC Rcd 2556 (2011), recon. 27 FCC Rcd 12829 (2012) (“*Rural Radio*”) that the proposed city of license change is in the public interest.

Metro Radio is not claiming a first local service preference because the existing community of Manassas is already in the Washington DC Urbanized Area. Similarly, the proposed community of Chantilly is also in the Washington DC Urbanized Area. Thus, the proposal is for an intra-urbanized area change in community of license. In the case of *Gearhart, Madras, Manzanita and Seaside, Oregon* (“*Gearhart*”), 26 FCC Rcd 10259 (MB 2011), the Bureau stated where a “first local service preference is not being used to enter the market”¹ the stricter standards are not to be applied. Instead, the determination is based on the Priority 4 public interest factors. Here, the application satisfies Priority 4 by reducing interference to Stations WKHZ, KTKT, and WOL (as detailed in the engineering exhibits). In addition, WKDV lost its transmitter site in late 2020 and has been operating with STA facilities since that time. It has spent years looking for a new site and the proposed operations appear to be the only option.

¹ Citing *East Los Angeles, Long Beach and Frazier Park, California*, 10 FCC Rcd. 3864, 3869 (MMB 1995); *Rural Radio* at ¶ 10.