

**April 2024
KZJJ(FM) Channel 283A
West Richland, WA
Section 307(b) Analysis Engineering**

Background

The instant application proposes a “one step” modification of KZJJ from Channel 283C3 to Channel 283A, with a change of community of license from Mesa, Washington, to West Richland, Washington. As a result of grant of this proposal, the community of West Richland will receive its first local service, and service provided to the Kennewick-Richland-Pasco Urbanized Area (which KZJJ is already considered to serve) will be increased.

All FM station contours in this application are calculated using the 3-second terrain database, and population figures are from the 2020 Census unless otherwise indicated.

West Richland Channel 283A Spacing Study

The allocation study exhibit included in this application demonstrates that the proposed West Richland Channel 283A allotment and transmitter sites satisfy the domestic co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules. This requires favorable consideration of the simultaneously-filed application for minor modification of KPLP 283C1 White Salmon, which a) specifies a fully-spaced allotment site for Channel 283C1 at White Salmon, and b) requests §73.215 authorization with respect to KZJJ. The spacing study also demonstrates that this proposal is mutually-exclusive with the licensed KZJJ facility.

The proposed allotment site is located 16.1 km from the far side of West Richland. The standard 70 dBu contour distance for a Class A station is 16.2 kilometers. Therefore, and as demonstrated by the attached map exhibit, a 70 dBu contour will be provided to 100% of West Richland.

West Richland Will Receive Its First Local Service

The proposed modification will provide the first local service licensed to West Richland, an incorporated City in Benton County having a 2020 Census population of 16,295 persons.¹ West Richland was officially incorporated on June 17, 1955. Mesa is not considered to lose local service because KZJJ is considered to serve the Kennewick-Richland-Pasco Urbanized Area. (See further discussion below.)

No White or Gray Areas or Underserved Areas Will Be Created

As is detailed in the gain area study included below, the proposed allotment of Channel 283A at West Richland will not result in the creation of any white or gray areas, nor will any underserved areas be created.

Kennewick-Richland-Pasco Urbanized Area

The Second Order on Reconsideration in MB Docket No. 09-52, *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures* (“Rural Radio Second Order on Recon”), addresses the evaluation of community of license change proposals where both the licensed and proposed facilities cover more than 50% of the same urbanized area with a 70 dBu signal:

We clarify that applicants will not be required to submit Tuck showings where both the current and proposed communities are located in the same urbanized area, or the current facilities cover, and the proposed facilities would or could be modified to cover, more than 50 percent of the same urbanized area with a daytime principal community signal. However, in such community of license change cases, the UASP presumption would apply to the new community, i.e., would presumptively prohibit treating the service at the new community as a first local transmission service under Priority (3). Thus an applicant proposing such an intra-urbanized area move may not claim a Priority (3) preference, unless it also makes a showing to rebut the UASP. Absent such a showing, **the applicant must claim a preference under Priority (4), other public interest matters, by demonstrating from which of the two communities the station would provide service to a greater area and population within the urbanized area.**

Attached is a map exhibit which depicts the licensed and proposed KZJJ 70 dBu contours in relation to the 2020 Census boundaries of the Kennewick-Richland-Pasco Urbanized Area. The

¹ The City of West Richland maintains a comprehensive website with public information for its citizens and businesses at www.westrichland.org

licensed KZJJ 70 dBu contour encompasses 52.3% of the urbanized area. The proposed KZJJ 70 dBu contour will encompass 89.1% of the urbanized area.

Both the licensed and proposed KZJJ facilities cover more than 50% of the urbanized area with a principal community signal and therefore both facilities are considered to be providing service to the entire Kennewick-Richland-Pasco Urbanized Area.² Therefore the instant proposal should be evaluated under Priority (4), other public interest matters.

Urbanized Area Service Area and Population Gain

Attached is a map exhibit which depicts the licensed and proposed KZJJ 60 and 70 dBu contours in relation to the Kennewick-Richland-Pasco Urbanized Area. The following table lists the percentage of the Kennewick-Richland-Pasco Urbanized Area which is served by the licensed and proposed 60 dBu and 70 dBu contours. Both the licensed and proposed 60 dBu contours cover 100% of the UA, but this proposal results in a significant improvement in 70 dBu service to the UA. Higher signal strengths are necessary for building penetration in the types of structures which are typical in urban areas. Therefore the change of community of license from Mesa to West Richland is a preferred arrangement of allotments in that it will improve signal strength – and therefore will improve reception – in the urban area which KZJJ serves.³

	Area	Population
Kennewick-Richland-Pasco Urbanized Area	302 sq km	255,401
Licensed 60 dBu	302 sq km 100%	255,401 100%
Licensed 70 dBu	158 sq km 52.3%	144,164 56.4%

² The Commission has established “...a rebuttable presumption that, when the community proposed is located in an urbanized area or could, through a minor modification application, cover more than 50 percent of an urbanized area, we will treat the application, for Section 307(b) purposes as proposing service to the entire urbanized area rather than the named community of license.” *See Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rule Making, 25 FCC Rcd 2556, 2567, ¶ 20. (2011).

³ See the Media Bureau’s decision letter in *WAXY-FM, West Palm Beach, FL*, BPH-20120529AKO, DA 13-552 (March 26, 2013), and also *Gearhart, Madras, Manzanita, and Seaside, Oregon*, Report and Order in MB Docket No. 10-118 (July 19, 2011).

Proposed 60 dBu	302 sq km 100%	255,401 100%
Proposed 70 dBu	269 sq km 89.1%	247,335 96.8%

As an additional public interest factor, Mesa is a shrinking community, having lost 21% of its population between the 2010 and 2020 censuses. Mesa dropped from a population of 489 in the 2010 Census, to just 385 in the 2020 Census. By comparison, West Richland is an active and growing community. In the same period, the city of West Richland has seen a dramatic 40% increase in population, going from 11,811 in 2010 to 16,295 in 2020.

Gain and Loss Area Study

There is overlap of the Mesa and the West Richland 60 dBu service areas. The gain area directly associated with the reallocation of KZJJ encompasses an area of 490 square kilometers and a population of 2,127 persons. The loss area encompasses an area of 1488 square kilometers and a population of 4,471 persons.

Loss Area Remaining Services Analysis

As is depicted on the attached map exhibit, the following 37 stations each provide service to a portion of the loss area.⁴

A	KALE	960 kHz	Richland
B	KFLD	870 kHz	Pasco
C	KJOX	1340 kHz	Kennewick

⁴ In determining reception service provided by non-reserved band FM stations, the service contour used is that which is set forth for the class of station in §73.215(a)(1) of the Rules. The service contour has been calculated based on the facility's authorized effective radiated power and height above average terrain, taking into account actual terrain. Vacant FM allotments have not been counted. In determining reception service provided by reserved band FM stations, the service contour used is the 60 dBu contour.

In determining reception service provided by AM stations, the service contour used is the daytime 2.0 mV/m ground wave contour, calculated from the current transmitter coordinates using authorized facilities.

In the case of stations with granted, but unbuilt construction permits for modifications to their currently licensed or permitted facilities, the authorized but unbuilt modified facilities have been used.

D	KOHU	1360 kHz	Hermiston
E	KONA	610 kHz	Kennewick-Richland
F	KTBI	810 kHz	Ephrata
G	KUJ	1420 kHz	Walla Walla
H	KVAN	1560 kHz	Burbank
I	KARY-FM	265C2	Grandview
J	KBLD	219C3	Kennewick
K	KEGX	293C0	Richland
L	KEYW	252C1	Pasco
M	KFAE-FM	206C	Richland
N	KGDN	267C3	Pasco
O	KGTS	217C2	College Place
P	KHSS	264C2	Athena
Q	KIOK	235C	Richland
R	KKSR	239C	Walla Walla
S	KLRF	203C2	Milton-Freewater
T	KMLW	202C3	Moses Lake
U	KNHK-FM	270C2	Weston
V	KOLU	211C1	Pasco
W	KOLW	248C1	Basin City
X	KONA	287C	Kennewick
Y	KORD-FM	274C0	Richland
Z	KQFM	229A	Hermiston
AA	KQFO	261C2	Pasco
AB	KRBM	215C2	Pendleton
AC	KRCW	242C2	Royal City
AD	KRKL	227C1	Walla Walla
AE	KUJ-FM	256C1	Burbank
AF	KWHT	278C1	Pendleton
AG	KWVN-FM	299C1	Pendleton

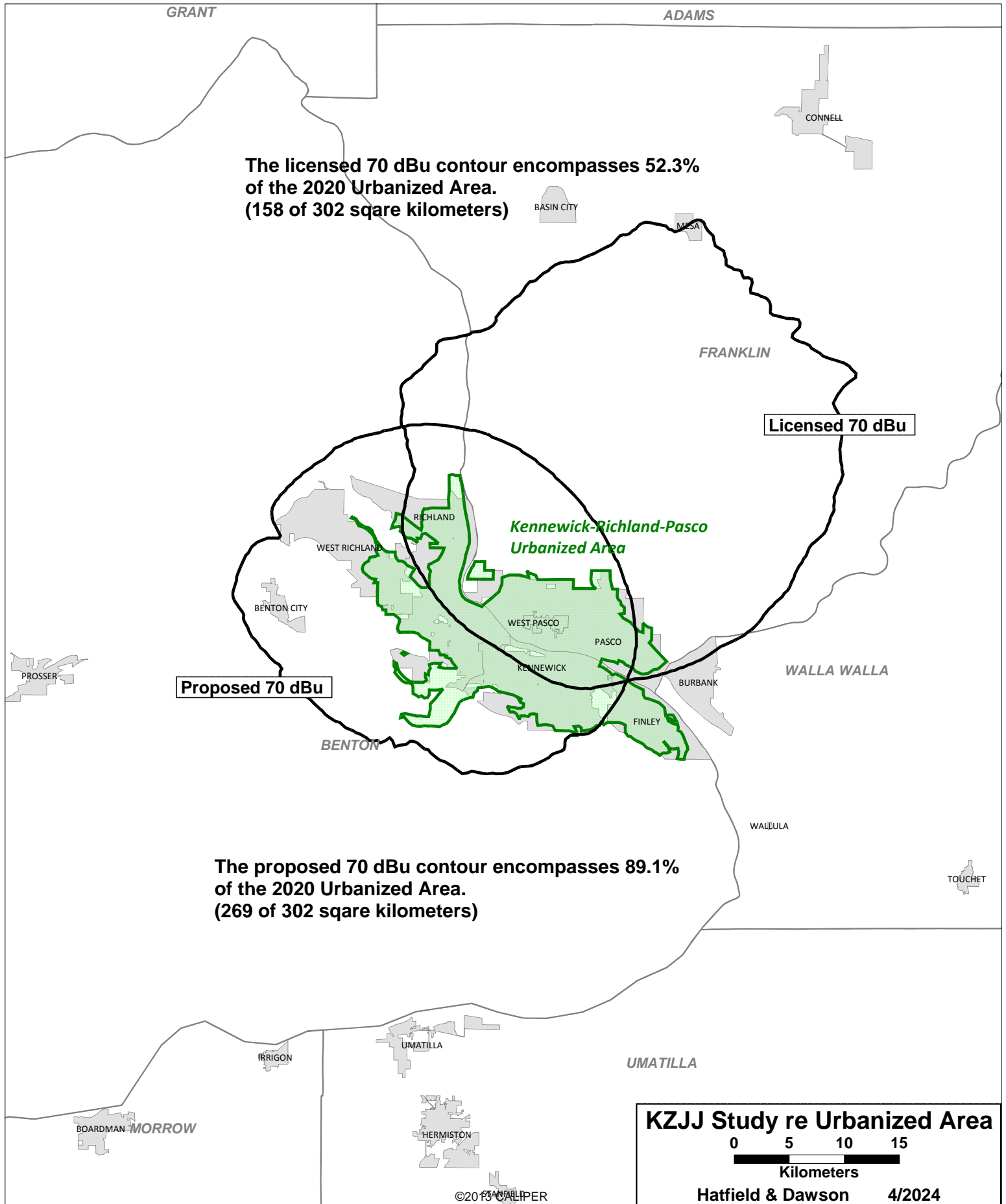
AH	KWWS	209C1	Walla Walla
AI	KXRX	246C0	Walla Walla
AJ	KZHR	223C1	Dayton
AK	KZTB	250C1	Milton-Freewater

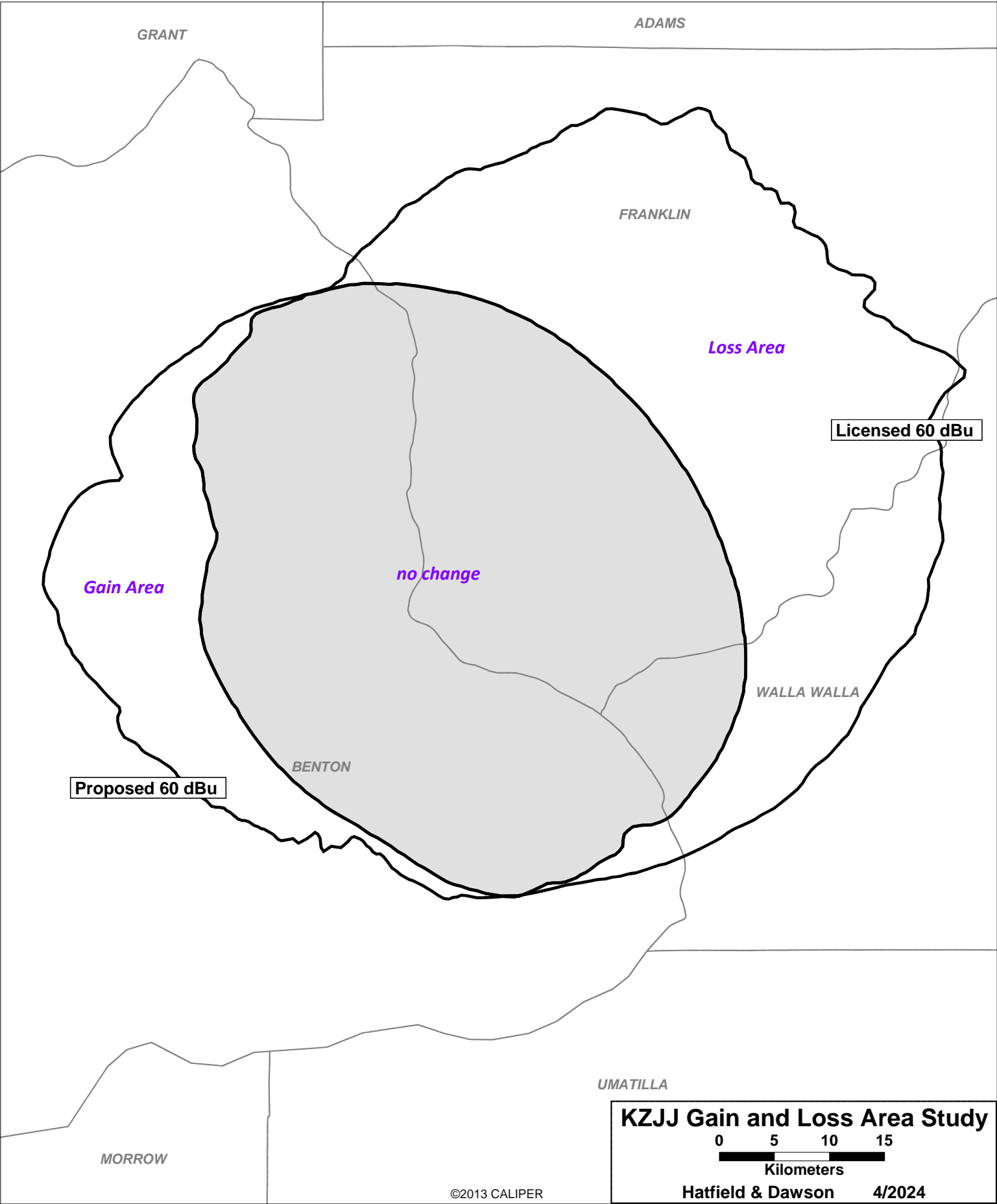
This map exhibit further demonstrates that no white, gray, or underserved areas will be created within the loss area. All portions of the loss area will be left with at least 9 reception services.

The community of Mesa itself will retain service from 17 other full-service stations.

Gain Area Existing Services Analysis

The entire gain area is considered to be well-served, with in excess of 5 existing aural services.





Letters are contour labels corresponding to the list in the accompanying text.

Numerals indicate the number of services remaining in portions of the loss area.

Loss Area

MESA

KZJJ Loss Area Study

0 10 20 30
Kilometers

Hatfield & Dawson 4/2024