

CORRECTION OF COORDINATES APPLICATION
KIX BROADCASTING, INC.
WGKX RADIO STATION
CH 290C - 105.9 MHZ - 100.0 KW
MEMPHIS, TENNESSEE
February 2004

EXHIBIT A

Licensed WGKX Shortages

As shown on Exhibit A1, WGKX, operating on Channel 290C at its licensed coordinates, does not meet the Commission's minimum distance separation requirements to two other stations: WNRQ, Channel 290C, Nashville, Tennessee, and WKXM-FM, Channel 290A, Winfield, Alabama. The shortage between WGKX and WNRQ was based on a waiver of §73.207 which KBI requested in BPH-19870226IO, as modified by BMPH-19890517JA. At that time, KBI was required to increase the height of the WGKX antenna to meet minimum Class C height or face reclassification to Class C1. The request for waiver was granted by the Commission. The shortage to station WKXM-FM is based on the licensee of that station invoking contour protection toward WGKX to address its shortspaced proposal.

WNRQ, Nashville, Tennessee

Based on the correction of coordinates for WGKX, the station is relocated, on paper, a distance of 0.03 kilometer (98.0 feet) from its licensed coordinates. As shown on Exhibit A2, the distance between WGKX and WNRQ is slightly increased, thus this is a reduction of the shortspace between the stations. As presently licensed, WGKX is located 286.63 kilometers from WNRQ; based on the correction, WGKX will be located 286.64 kilometers from WNRQ.

Since the WGKX is moving farther away, although only slightly, from WNRQ, it is believed that WGKX remains in compliance with the spacing rules as they relate to WNRQ, since no increase to the shortspace is created by this correction.

WKXM-FM, Winfield, Alabama

As presently authorized, WGKX is located 223.35 kilometers from WKXM-FM. Based on the correction of coordinates, WGKX would be located 223.34 kilometers from WKXM-FM, increasing the shortspace by 0.01 kilometer (33.0 feet). Generally, the use of a shortspaced site could be addressed through the use of §73.215 of the Commission's rules, however, its use in this instant case would significantly impact WGKX. WGKX is licensed, and would continue to be authorized as proposed in this instant application, as a Class C facility with an effective radiated power of 100.0 kilowatts with an antenna height above average terrain of 303 meters.¹ As such, WGKX does not approach maximum Class C height. Were it to address this de minimus change in spacing under the contour protection rules, it would surrender protection to its facility to less than that of a maximum Class C or, for that matter, Class C0 facility. Further, this correction does not proposed any actual construction or changes. It merely seeks to correct the coordinates of the WGKX license to bring it into agreement with the tower registration.

In an application submitted to the Commission by Iowa Great Lakes Broadcasting Co., Inc., for station KICD-FM (BPH-19970825IC), the applicant sought a waiver of §73.207 to correct its license to bring it into accord with the tower registration. It proposed a decrease in the spacing between KICD-FM and another station which was also authorized pursuant to §73.215

1) This was just above the former minimum Class C standards, prior to the creation of Class C0 stations.

of the rules. In a letter opinion, dated September 10, 1996,² the Commission waived §73.207 spacing requirements for the applicant toward the shortspaced station noting that it was a correction of less than 0.1 kilometer; that the application sought to correct the coordinates of the facility and did not involve an actual change in facilities; and the spacing between the licensed and proposed facilities was de minimus.

As denoted above, the WGKX situation is similar to KICD-FM. The distance between WGKX and WKXM-FM is changed by only 0.01 kilometer, it involves a correction of coordinates only (no actual change is proposed) and the distance between the authorized WGKX and proposed WGKX is de minimus, less than 100 feet. Therefore, it is respectfully requested that the Commission waive §73.207 spacing requirements as they apply to WKXM-FM and allow WGKX to be considered a fully-spaced FM facility

Based on the foregoing, it is believed that the proposed correction to the WGKX facilities is in compliance with the Commission's rules, provided a waiver is granted with respect to WKXM-FM.

2) Letter to Leonard S. Joyce, Esq., counsel for Iowa Great Lakes Broadcasting Co., Inc., licensee of KICD-FM.

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EXHIBIT A1

Present clearance study for WGKX Memphis, Tennessee
Using licensed coordinates as reference

REFERENCE	CLASS = C	DISPLAY DATES
35 09 17 N		DATA 02-06-04
89 49 20 W	Current Spacings	SEARCH 02-10-04
----- Channel 290 - 105.9 MHz -----		

Call	Channel N. Lat.	Location W. Lng. Ant	Dist Power	Azi HAAT	FCC	Margin
WGKX	LIC 290C	Memphis	TN 0.00	0.0	290.0	-290.00
	35 09 17	89 49 20 CN	100.000 kW	303 M		
	Kix Broadcasting, Inc.		BLH-19891221KC			
 1 WNRQ	 LIC 290C	 Nashville	 TN 286.63	 69.1	 290.0	 -3.37
	36 02 08	86 50 56 CY	100.000 kW	376 M		
	Capstar TX Limited Prntrshp		BLH-19831212AN			
 2 RDEL	 DEL 290A	 Winfield	 AL 223.35	 123.5	 226.0	 -2.65
	34 01 53	87 48 06	6.000 kW	100 M		
 2 WKXMFM	 LIC-N 290A	 Winfield	 AL 223.35	 123.5	 226.0	 -2.65
	34 01 53	87 48 06 NCN	2.500 kW	125 M		
	Ad-Media Management Corp.		BLH-19910725KA			
 3 WQAK	 LIC 289A	 Union City	 TN 164.67	 22.4	 165.0	 -0.33
	36 31 28	89 07 13 CN	6.000 kW	100 M		
	Twin States Broadcasting		BLH-19940512KC			
 RADD	 ADD 290A	 Brilliant	 AL 226.15	 123.2	 226.0	 0.15
	34 01 25	87 46 17	6.000 kW	100 M		
 KAKJ	 LIC 287A	 Marianna	 AR 95.46	 244.9	 95.0	 0.46
	34 47 14	90 46 03 CN	6.000 kW	100 M		
	L.t. Simes Ii & Raymond Simes		BLH-19950713KA			
 ALLO	 VAC 290A	 Alton	 MO 227.08	 321.5	 226.0	 1.08
	36 44 39	91 24 28	6.000 kW	100 M		
			RM-10261			
 KAKJ.A	 APP 287A	 Marianna	 AR 96.88	 245.4	 95.0	 1.88
	34 47 20	90 47 08 CX	6.000 kW	100 M		
	L.t. Simes Ii & Raymond Simes		BPH-20030702AAL			
 ALLO	 RSV 287A	 Marianna	 AR 96.88	 245.4	 95.0	 1.88
	34 47 20	90 47 08	6.000 kW	100 M		
 ALLO	 VAC 289A	 Kensett	 AR 168.05	 273.5	 165.0	 3.05
	35 14 00	91 39 54	6.000 kW	100 M		
			RM9484			
 WTNM	 LIC 288A	 Water Valley	 MS 104.74	 176.2	 95.0	 9.74
	34 12 45	89 44 49 CN	4.700 kW	113 M		
	Telesouth Communications		BLH-20001211ACG			

Note 1: This shortage was based on a waiver of \$73.207. See Exhibit A.
Note 2: This shortage was created by WKXM-FM under \$73.215. See Exhibit A.
Note 3: This shortage is less than 0.49 kilometer and therefore round to zero.

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EXHIBIT A2

Clearance study for WGKX Memphis, Tennessee
Using actual site as reference

REFERENCE	CLASS = C	DISPLAY DATES
35 09 16 N		DATA 02-06-04
89 49 20 W	Current Spacings	SEARCH 02-10-04
----- Channel 290 - 105.9 MHz -----		

Call	Channel N. Lat.	Location W. Lng. Ant	Dist Power	Azi HAAT	FCC	Margin
WGKX	LIC 290C	Memphis	TN 0.03	0.0	290.0	-289.97
	35 09 17	89 49 20 CN	100.000 kW	303 M		
	Kix Broadcasting, Inc.		BLH-19891221KC			
 1 WNRQ	 LIC 290C	 Nashville	 TN 286.64	 69.1	 290.0	 -3.36
	36 02 08	86 50 56 CY	100.000 kW	376 M		
	Capstar TX Limited Prntrshp		BLH-19831212AN			
 2 RDEL	 DEL 290A	 Winfield	 AL 223.34	 123.4	 226.0	 -2.66
	34 01 53	87 48 06	6.000 kW	100 M		
 2 WKXMFM	 LIC-N 290A	 Winfield	 AL 223.34	 123.4	 226.0	 -2.66
	34 01 53	87 48 06 NCN	2.500 kW	125 M		
	Ad-media Management Corp.		BLH-19910725KA			
 3 WQAK	 LIC 289A	 Union City	 TN 164.70	 22.4	 165.0	 -0.30
	36 31 28	89 07 13 CN	6.000 kW	100 M		
	Twin States Broadcasting		BLH-19940512KC			
 RADD	 ADD 290A	 Brilliant	 AL 226.13	 123.2	 226.0	 0.13
	34 01 25	87 46 17	6.000 kW	100 M		
 KAKJ	 LIC 287A	 Marianna	 AR 95.45	 244.9	 95.0	 0.45
	34 47 14	90 46 03 CN	6.000 kW	100 M		
	L.t. Simes Ii & Raymond Simes		BLH-19950713KA			
 ALLO	 VAC 290A	 Alton	 MO 227.10	 321.5	 226.0	 1.10
	36 44 39	91 24 28	6.000 kW	100 M		
			RM-10261			
 KAKJ.A	 APP 287A	 Marianna	 AR 96.87	 245.4	 95.0	 1.87
	34 47 20	90 47 08 CX	6.000 kW	100 M		
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	34 47 20	90 47 08	6.000 kW	100 M		
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	35 14 00	91 39 54	6.000 kW	100 M		
			RM9484			
 WTNM	 LIC 288A	 Water Valley	 MS 104.71	 176.2	 95.0	 9.71
	34 12 45	89 44 49 CN	4.700 kW	113 M		
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