

TECHNICAL EXHIBIT

CHANGE OF COMMUNITY OF LICENSE

CASPER, WYOMING
MIDWEST, WYOMING

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station KWYY(FM), Casper, Wyoming ("KWYY" or the "Station"), in support of a application for a minor modification construction permit specifying operation on channel 238C at Midwest, Wyoming, in lieu of the current license for operation on channel 283C (same channel) at Casper, Wyoming. This application is being filed contingently along with the concurrently-filed application for a construction permit for the minor modification of Station KRVK(FM), Midwest, Wyoming ("KRVK") for change of community of license of KRVK to Bar Nunn, Wyoming.¹

As the requested change is mutually exclusive with the Station's current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a)(i) and 73.3573(g).

The following is a summary of the merits of this reallocation proposal:

- The community of Midwest, Wyoming (2000 Census population 408 persons) will continue to be provided with local aural transmission service.
- The community of Casper, Wyoming (2000 Census population 49,644 persons) will continue to have multiple local aural transmission services.

¹ These contingent applications meet the requirements of 47 C.F.R. Sections 73.3517(e). Note that there is no written agreement for the coordinated facility modifications between KWYY and KRVK because the stations are licensed to the same entity.

- The proposed channel 238C allotment site at Midwest, Wyoming, satisfies the Commission's allocations spacing rules for a fully spaced, 100 kW Class C facility.²
- The 60 dBu gain area associated with this proposal will encompass 119 persons, while the 60 dBu loss area will encompass 108 persons, for a net gain of 11 additional persons served within the KWYY 60 dBu service contour.³
- The 238C Casper, Wyoming 60 dBu loss area continues to be served by other aural services.⁴

Table of Figures Accompanying this Exhibit

Figure 1	KWYY(FM) Channel 238C Spacing Study at Allocations Site
Figure 2	KWYY(FM) Channel 238C Present and Proposed 60 dBu Service
Figure 3	KWYY(FM) Channel 238C Present and Proposed 70 dBu Service
Figure 4	Map of Services to Loss Area
Figure 5	Tabulation of Services to Loss Area
Figure 6	Map of Protected Service to Proposed Community of License

² The proposed allotment reference coordinates are 42° 52' 10" North, 106° 18' 36" West. See this Exhibit under the heading "Compliance With FCC Rules" for details on allocations considerations with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

³ See *Figure 2*.

⁴ See *Figures 4 and 5*.

Figure 7 Table of Protected Service to Proposed
 Community of License

Proposed Community Change

Casper, Wyoming, is located in Natrona County, Wyoming, and has a 2000 U.S. Census population of 49,644 persons. Casper would continue to be served by a multitude of local aural transmission services, including AM stations KKTL, KTWO and KVOC, and FM stations KASS, KCPS-FM, KHOC, KLWC, KMGW, KMLD, KQLT, KTRS-FM and KUWC.

Midwest, Wyoming, is located in Natrona County, Wyoming, and has a 2000 U.S. Census population of 408 persons. Together with the contingent application to modify KRVK, this application will ensure that Midwest continues to be served by a local aural transmission service, while Bar Nunn, Wyoming would obtain its first local aural transmission service.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 238C at Midwest, Wyoming. The allotment reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments as a full 100 kW Class C allotment, except for the Station's existing channel 238C allotment at Casper, Wyoming, for which this proposal is a mutually exclusive substitute.

Operation from the channel 238C reference site would provide the requisite city grade (70 dBu) signal to all of Midwest.⁵ *Figure 3* is a map which depicts the community grade coverage (70 dBu) contour based on maximum class C facilities (ERP 100 kW/HAAT 600 meters) at the proposed allotment site. As shown, all (100%) of Midwest is located within the 70 dBu city grade contour.

⁵ See *Figure 3* herein.

Urbanized Area Considerations

The Station's present 238C 70 dBu contour and the proposed 70 dBu contour under this application both encompass 100% of the population and 100% of the area of the Casper, Wyoming Urbanized Area.

60 dbu Service and Gain and Loss Areas

There are currently 78,365 persons residing within the KWYY 60 dBu contour. There would be 78,376 persons residing within the proposed KWYY 60 dBu contour as calculated from the proposed allotment reference site and based on maximum Class C facilities; the area within the proposed 60 dBu contour would be 25,982.5 square kilometers. 78,257 persons currently residing within the KWYY 60 dBu contour would continue to receive service under this proposal. 108 persons would lose service. 119 persons would gain new service within the proposed KWYY 60 dBu contour as a result of the proposed operation at Midwest for a net aggregate gain of 11 persons. See *Figure 2*.

Proposed 70 dbu Service

There would be 70,498 persons residing within the proposed 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class C facilities; the area within the proposed 70 dBu contour would be 14,084.7 square kilometers.

Protected Service to Proposed Community of License

Midwest, Wyoming, the proposed community of license, currently receives protected aural service from 10 radio stations, as shown in *Figures 6* and *7* (counting those stations which provide protected service to at least 80 percent of the area of the community of license).

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions. The AM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.182.

Population and Area

The population within these service contours was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids." The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

The community of license of KWYY may be changed from Casper, Wyoming, to Midwest, Wyoming, with continued operation on channel 238C, in compliance with all applicable Commission rules. In conjunction with the contingent application to modify KRVK from Midwest, Wyoming, to Bar Nunn, Wyoming: (a) the community of Midwest, Wyoming would continue to be provided with a local aural transmission service, (b) a first local aural transmission service would be provided to Bar Nunn, Wyoming, (c) there would be an overall increase in the population served by KWYY, and (d) the community of Casper, Wyoming would continue to be served by local aural transmission services from multiple other radio stations. Therefore, contingent on the grant of the requested KRVK permit, the applicant requests a construction permit for the minor modification of the license to operate KWYY to specify Midwest, Wyoming as the community of license, in lieu of Casper, Wyoming.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor
January 19, 2007

Figure 1

Spacing Study at Allocation Site

ComStudy 2.2 search of channel 238 (95.5 MHz Class C) at 42-52-10.0 N, 106-18-36.4 W.

Callsign	State	City	Freq	Chanl	ERP_w	Class	Status	Dist_km	Sep	Clr
KWYY	WY	CASPER	95.5	238	100000	C	LIC	13.98	290	-276.0
	WY	BAIROIL	94.9	235	0	A	APP	123.85	95	28.8
	WY	PINE BLUFFS	95.5	238	0	C3	ADD	259.26	237	22.3
KKHI	WY	ROCK RIVER	95.9	240	0	A	USE	128.49	95	33.5
KKHI	WY	ROCK RIVER	95.9	240	3400	A	CP	133.24	95	38.2

Figure 2
Present and Proposed 60 dBu Service

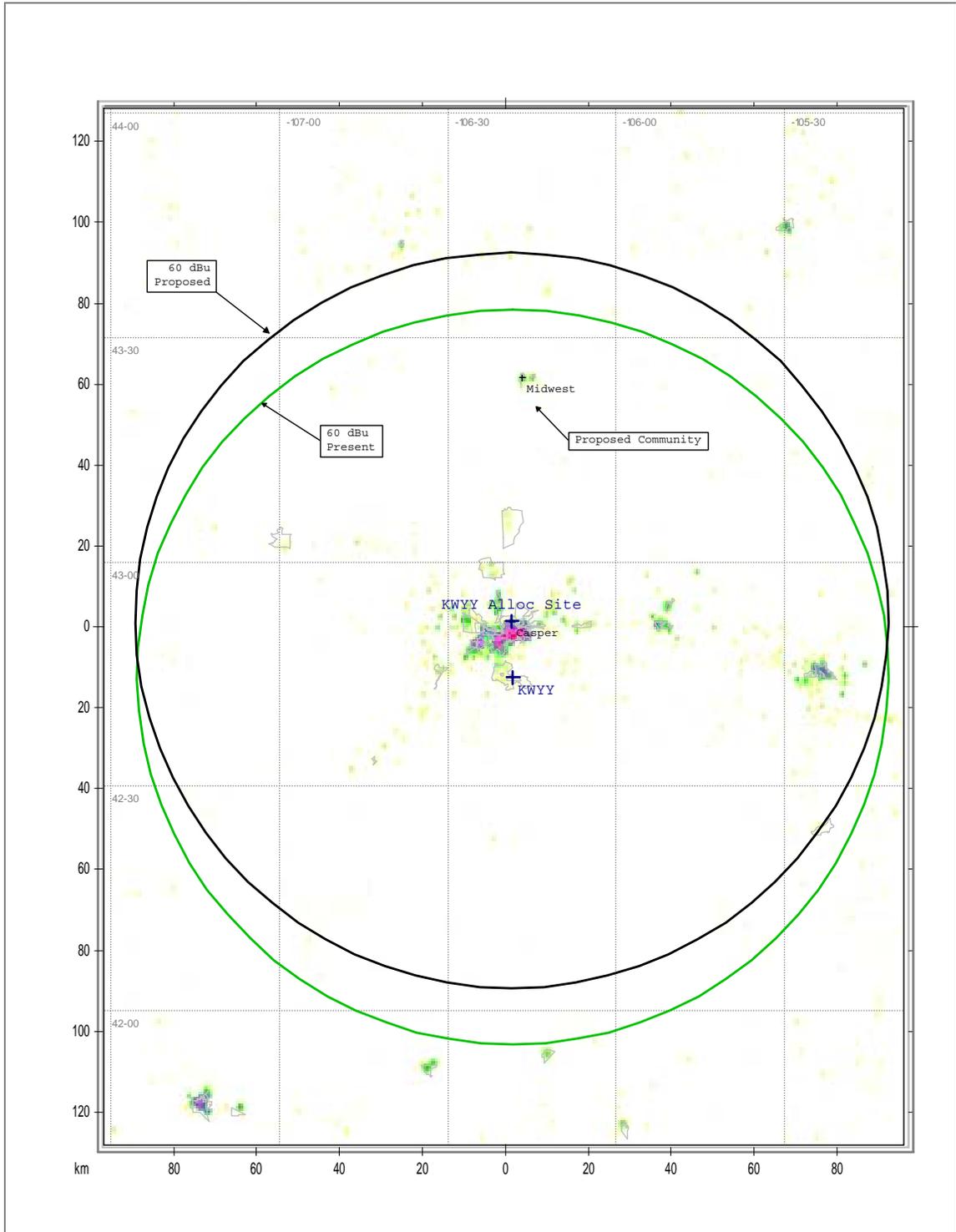


Figure 3
Present and Proposed 70 dBu Service

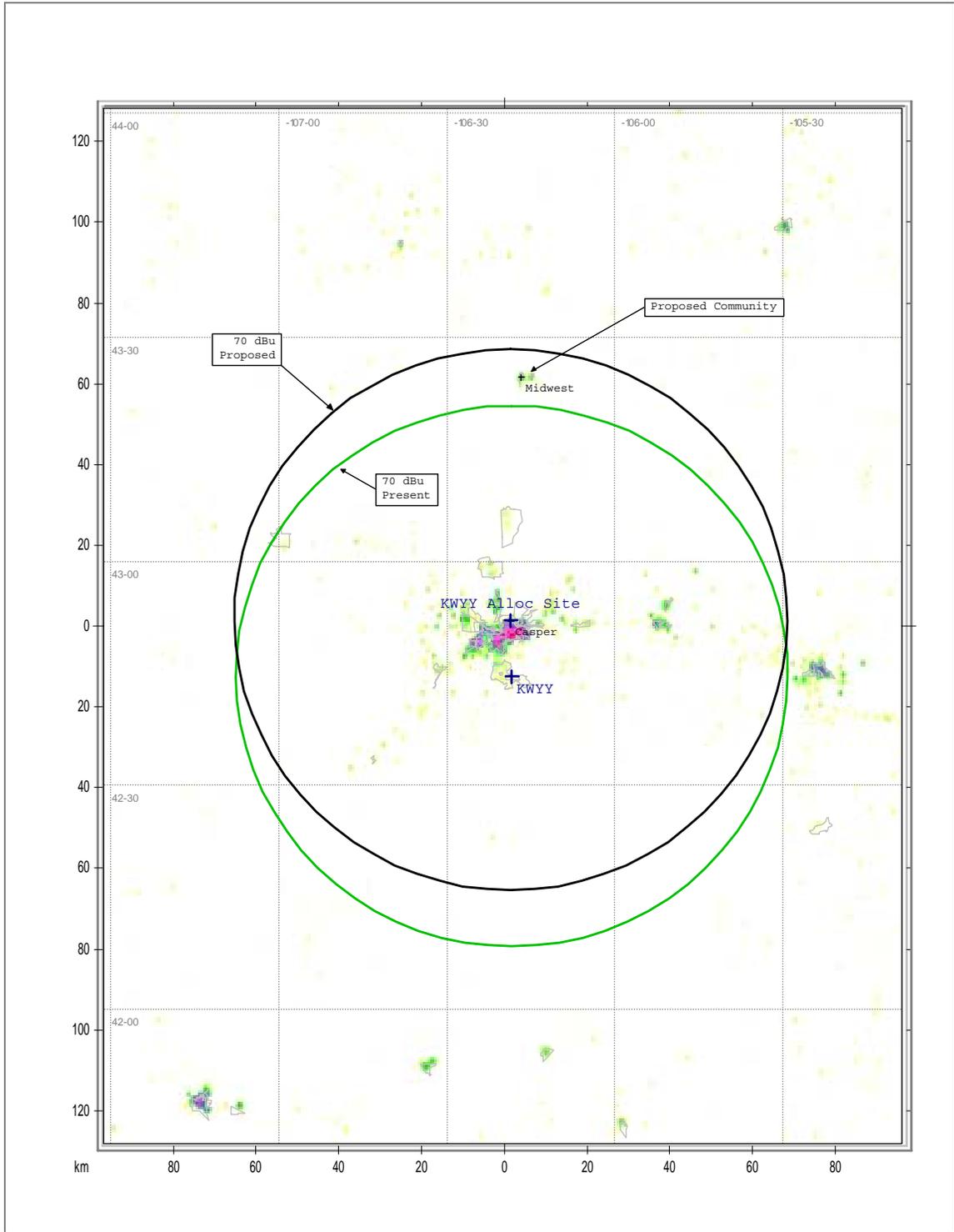


Figure 4

Map of Services to Loss Area

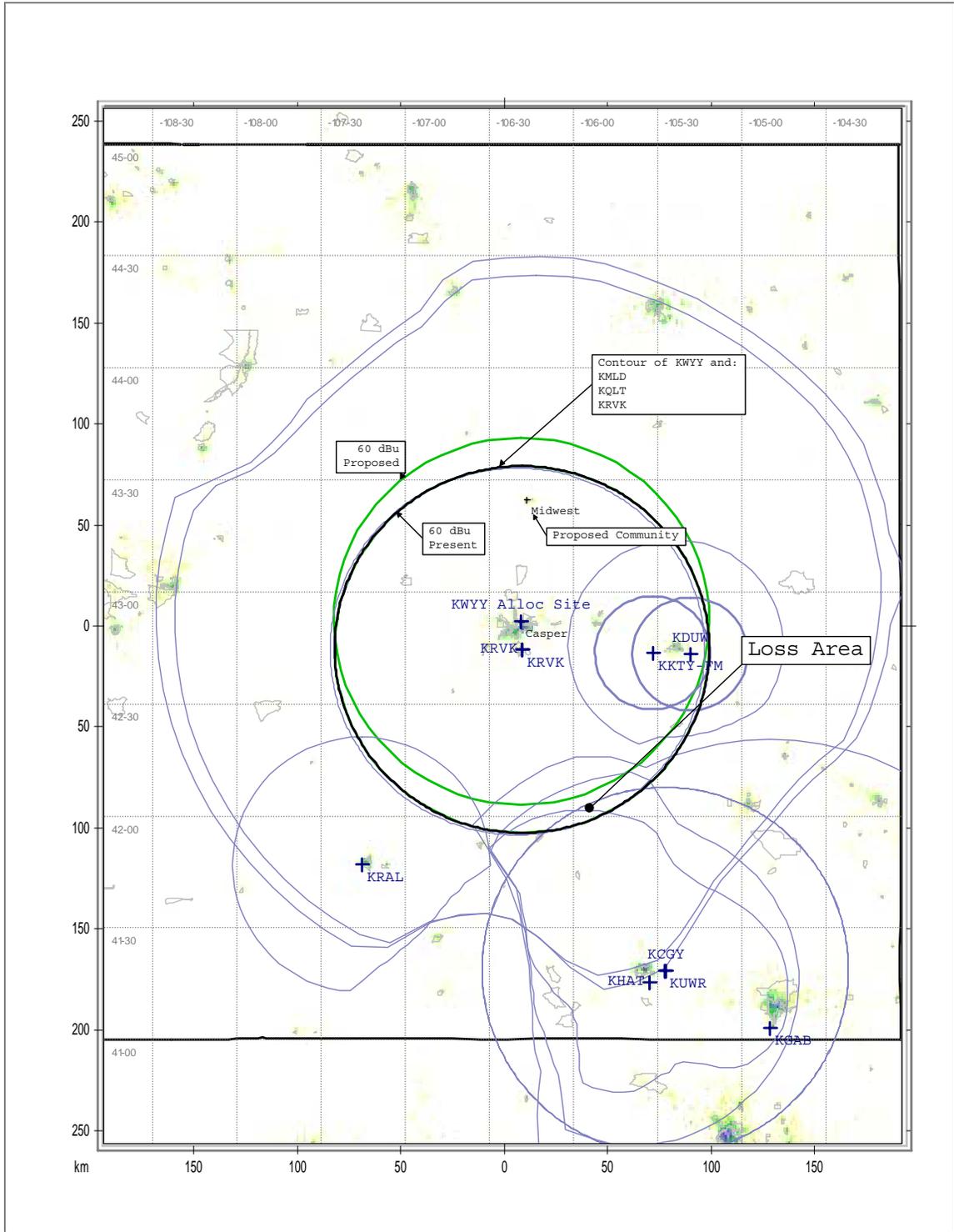


Figure 5
Tabulation of Services to Loss Area

Call Sign	Facility_id	City	State	Freq
KHAT	10333	LARAMIE	WY	1210
KUYO	11003	EVANSVILLE	WY	830
KTWO	11924	CASPER	WY	1030
KMLD	11927	CASPER	WY	94.5
KCGY	14753	LARAMIE	WY	95.1
KHOC	15925	CASPER	WY	102.5
KKTY-FM	17411	DOUGLAS	WY	99.3
KOWB	24700	LARAMIE	WY	1290
KWYY	26300	CASPER	WY	95.5
KGAB	30224	ORCHARD VALLEY	WY	650
KKTY	38387	DOUGLAS	WY	1470
KASS	43477	CASPER	WY	106.9
KRAL	46736	RAWLINS	WY	1240
KQLT	47878	CASPER	WY	103.7
KUWR	69131	LARAMIE	WY	91.9
KCSP-FM	71810	CASPER	WY	90.3
KRVK	88406	MIDWEST	WY	107.9
KDUW	92622	DOUGLAS	WY	91.7

Figure 6
Map of Protected Service to Proposed Community of License

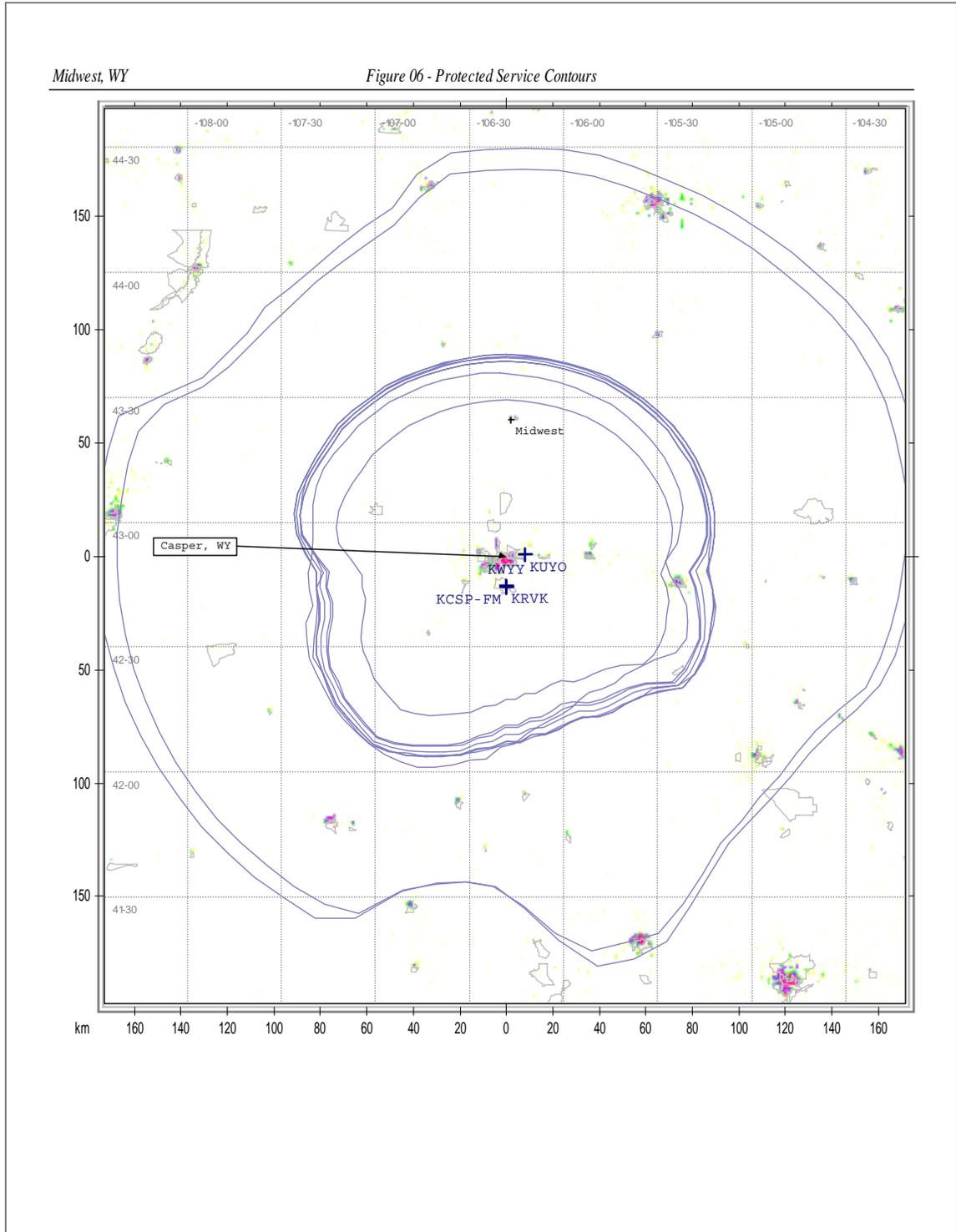


Figure 7

Table of Protected Service to Proposed Community of License

Count	Call Sign	Fac ID	City	State
1	KWYY	26300	CASPER	WY
2	KHOC	15925	CASPER	WY
3	KASS	43477	CASPER	WY
4	KTRS-FM	26301	CASPER	WY
5	KCSP-FM	71810	CASPER	WY
6	KMLD	11927	CASPER	WY
7	KQLT	47878	CASPER	WY
8	KRVK	88406	MIDWEST	WY
9	KUYO	11003	EVANSVILLE	WY
10	KTWO	11924	CASPER	WY