

MINOR CHANGE APPLICATION/
CITY OF LICENSE CHANGE
CSN INTERNATIONAL
WUJC (FM) RADIO STATION
CHANNEL 216C1 – 91.1 MHZ – 100Kw
August 2007

City of License Change Review

This application seeks to change the community of license of the underlying Construction Permit of licensed radio station WUJC-FM from St. Marks, Florida to Tallahassee, Florida, using the recently adopted city of license change procedures, as outlined in MB Docket #05-210, released November 29, 2006. This exhibit is offered in response to Section VII, Item 19 (Community of License - Section 307(b)). As indicated on Channel 216C1, at the proposed allocation/implementation coordinates at Tallahassee, Florida, **this application is mutually exclusive to the coordinates of the existing WUJC underlying Construction Permit BPED-20070108ACC.**

1. This proposal will not change site location or service area of WUJC's underlying construction permit. This proposal will also remain a minor modification as was specified in the Revised FM Engineering Rules, released in a *Report and Order* November 1, 2000 in MMDocket 98-93. The 1mV/m (60 dBu) protected contour of BPED-20070108ACC presently covers the city borders of Tallahassee and will continue to cover a total of 4224.05 sq km with a population count of 197,690 persons, a significantly higher amount of population than its present licensed 1 mV/m (60 dBu) protected contour and City of License St. Marks.
2. WUJC is presently on the air, at the site of its license BLED-20050804ACX. WUJC would not be the only AM or FM station authorized to provide service to Tallahassee, Florida. There are five (5) AM radio stations and ten (10) FM radio stations currently licensed to Tallahassee, as listed below:

AM

WTAL (1450 kHz)

FM

WFSO NCE (91.5 MHz)

WRFR (1070 kHz)
WHBT (1410 kHz)
WCVB (1330 kHz)
WNLS (1270 kHz)

WVSF NCE (89.7 MHz)
WANM NCE (90.5 MHz)
WBZE (98.9 MHz)
WUTL (106.1MHz)
WFSU-FM NCE (88.9 MHz)
WAIB(103.1 MHz)
WHBX (104.1MHz)
WGLF (92.3 MHz)
WTNT-FM (94.9 MHz)

Currently, WUJC is the only licensed full power station (AM or FM) licensed to the community of St. Marks. Vacating this City of License, would only open an opportunity for other AM and FM broadcast applicants to easily obtain a favorable allotment to St. Marks.

3. The U.S. Census Bureau has an "incorporated places" listing for Tallahassee, indicating an April 2000 Census population of 150,624 persons, and an estimated 2006 population of 159,012 persons, a significantly higher population than that of St. Marks 2000 population census of 272, thus making this proposal a higher concentration of persons to service for public interest.

4. Tallahassee qualifies as a significant community with its own School District, local government, fire and police departments, houses of worship and other local businesses, many of which contain Tallahassee in its name.

CSN submits that -- the Commission should conclude that Tallahassee has a geographically identifiable population grouping that is worthy of the proposed allotment of an NCE channel to the community. See, e.g., Hannibal, Ohio, 6 FCC Rcd. 2144, 69 RR 2d 113 (MMB 1991); FM Channel Assignments: Middletown, California, 69 RR 2d 1626 (MMB 1991); Oak Grove, FL, 5 FCC Rcd 3774 (1990).

Preferential Allotment Priority: In considering a reallocation and change of community of license proposal, the FCC will compare the existing allotment versus the proposed allotment to determine whether the reallocation will result in a preferential arrangement of allotments. This determination is based upon the FM allotment priorities set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982)(wherein the FM allotment priorities are set forth as (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters -- with co-equal weight given to priorities (2) and (3).

CSN International submits that this application is worthy of a community change because the public interest will be served at a higher degree by reallocating Channel 216C1 to Tallahassee, Florida as set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982)....the FM allotment priorities under (4) **other public interest matters**..... WUJC is a non commercial educational FM Station operated by its Licensee CSN International and, as is true with broadcasters in the Reserved Band, WUJC relies upon listener support to continue operations. Because there is a much higher concentration of WUJC listeners that are located within the city borders of Tallahassee that can relate to localized interests in their own community, such as, but not limited to, weather and news, as opposed to continuing

a City of License to St. Marks, CSN ascertains that this community change is highly relevant. The residents of St. Marks will continue to enjoy the quality of signal and service as the 1 mV/m (60 dBu) contour of the underlying construction permit will continue to cover the population within the city borders of St. Marks as well as Tallahassee.

In light of the above, CSN International respectfully requests that the Commission grant this proposal.