

TECHNICAL EXHIBIT AND
SECTION 307(b) STATEMENT

CHANGE OF PRINCIPAL COMMUNITY

KMRQ(FM)

MANTECA, CALIFORNIA
RIVERBANK, CALIFORNIA

August 2009

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station KMRQ(FM), Manteca, California, Facility ID No. 12963, in support of a minor change application to specify operations on channel 244A at Riverbank, California, in lieu of channel 244A at Manteca, California.

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 proposal:

- The community of Riverbank, California (2000 Census population 15,826 persons) would continue to be provided with local aural transmission service.
- The community of Manteca, California (2000 Census population 62,651 persons) would continue to be provided with local aural transmission service.¹
- The proposed channel 244A allotment site at Riverbank, California satisfies the Commission's allocations

¹ This application is being filed as a contingent application along with the application for the minor modification of KCBC(AM), 770kHz, to increase nighttime power and to change community of license from Riverbank to Manteca, California.

spacing rules for a fully spaced, full 6 kilowatt ("kW") Class A facility.²

- The 60 dBu service area associated with the proposed operation of KMRQ(FM) on channel 244A to Riverbank, California would encompass 458,398 persons, while the current 60 dBu service area encompasses 425,230 persons, for a net gain of 33,168 additional persons served within the KMRQ(FM) 60 dBu service contour. As an additional public service benefit, as demonstrated in the contingently-filed application to modify KCBC(AM), new nighttime service and additional areas of nighttime interference service will be provided to the public by the grant and implementation of the KCBC(AM) contingent application.
- The channel 246A at Manteca, California 60 dBu loss area is well served by a number of radio services.³

Table of Figures Accompanying this Exhibit

Figure 1	KMRQ(FM) Channel 244A Allocations Spacing Study at Allocations Site
Figure 2	KMRQ(FM) 60 dBu Gain and Loss Areas
Figure 3	Tabulation of Services to KMRQ(FM) 60 dBu Loss Area
Figure 4	Map of Services to KMRQ(FM) 60 dBu Loss Area

² The proposed allotment and antenna site reference coordinates are upon an existing tower identified by registration number 1060757 located at 37° 40' 49.8" North, 120° 55' 25.5" 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 Figures 3 and 4.

Figure 5 KMRQ(FM) Present and Proposed 70 dBu Service

Figure 6 Map of Protected Service to Proposed
Community of License

Figure 7 Table of Protected Service to Proposed
Community of License

Proposed Change

Manteca is located in San Joaquin County, California, and has a 2000 U.S. Census population of 62,651 persons. Manteca would continue to be served by a local aural transmission service, specifically, KCBC(AM) as proposed in the contingently-filed application for KCBC(AM).

Riverbank is located in Stanislaus County, California, and has a 2000 U.S. Census population of 15,826 persons. Riverbank would continue to be served by a local aural transmission service, specifically, KMRQ(FM) as proposed in this application.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 244A at Riverbank, California. 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 6 kW Class A allotment, except for KMRQ(FM)'s existing channel 244A operation at Manteca, California, for which this proposal is a mutually exclusive substitute.

Operation from the channel 244A reference site would provide the requisite community grade (70 dBu) signal to all of Riverbank.⁴ *Figure 5* is a map which depicts the community grade coverage (70 dBu) contour based on maximum class A facilities (ERP 6 kW/HAAT 100 meters) at the proposed allotment site. As shown, all (100%) of Riverbank

⁴ See Figure 5 herein.

is located within the predicted 70 dBu community grade contour.

Proposed 60 dBu Area

There would be 458,398 persons residing within the proposed KMRQ(FM) 60 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within KMRQ(FM)'s proposed 60 dBu contour would be 4,772 square kilometers.

Proposed 70 dBu Area

There would be 351,031 persons residing within the proposed KMRQ(FM)'s 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within KMRQ(FM)'s proposed 70 dBu contour would be 803 square kilometers.

60 dBu Gain and Loss Areas

There are currently 425,230 persons residing within the KMRQ(FM) 60 dBu contour. There will be 458,398 persons residing within the proposed KMRQ(FM) 60 dBu contour; 347,038 persons currently residing within the KMRQ(FM) 60 dBu contour would continue to receive service under this proposal; 78,192 persons would lose service; and 86,320 persons would gain new 60 dBu service as a result of the proposed operation at Riverbank, for a net aggregate gain of 33,138 persons. See *Figure 2*.

The 60 dBu loss area related to the modification of KMRQ(FM) to Riverbank is well served by many aural services. See *Figures 3 and 4*.

Urbanized Area Considerations

The current KMRQ(FM) channel 244A 70 dBu contour encompasses 52% of the population and 48% of the area of the Modesto Urbanized Area. The proposed channel 244A 70 dBu contour would encompass 97% of the population and 96% of the area of the Modesto Urbanized Area. Although Urbanized Area considerations are not relevant for this

proposed exchange of communities of license, even if applicable, because KMRQ(FM) already serves the majority of the population of the Modesto Urbanized Area (and KCBC(AM) already serves the entirety of the Manteca Urbanized Area), no "Tuck" showing would be necessary in any event for the proposed modifications. See, e.g., *Memphis and Arlington, Tennessee, and Saint Florian, Alabama*, 21 FCC Rcd 1144 (Med. Bur. 2006) (no Tuck analysis required when station already serves Urbanized Area).

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 the FM service contour (1 mV/m or 60 dBu) 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.

Protected Service to Proposed Community of License

Riverbank, California, the proposed community of license, currently receives protected aural service from 29 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).

Conclusion

KMRQ(FM) can be modified from operation on channel 244A at Manteca, California, to operation on channel 244A at Riverbank, California, in compliance with all applicable Commission rules. The communities of Riverbank,

California, and Manteca, California, would continue to have local aural transmission services. No service would be lost in any underserved area⁵ and no new underserved areas would be created as a result of this proposal. This proposal, along with the contingent application for the modification of KCBC(AM) will improve service to the public, increasing both FM and AM (nighttime) populations served. Therefore, the licensee requests the issuance of a construction permit for the minor modification of KMRQ(FM) to specify operations on channel 244A at Riverbank, California, and concurrent grant of the KCBC(AM) application.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor

⁵ Defined as an area receiving service from less than five aural broadcast services. In the case of this proposal, the 60 dBu loss areas will continue to receive 60 dBu service from multiple sources, local and distant. See Figures 3 and 4.

Figure 1

Spacing Study at Allocation Site

ComStudy 2.2 search of channel 244 (96.7 MHz Class A) at 37-40-49.8 N,
120-55-25.5 W.

CALL	State	City	Freq	Chanl	ERP_w	Class	Status	Dist_km	Sep	Clr
KMRQ	CA	MANTECA	96.7	244	1500	A	LIC	18.64	115	-96.4
KTSE-FM	CA	PATTERSON	97.1	246	1350	A	LIC	33.78	31	2.8
KSEG	CA	SACRAMENTO	96.9	245	50000	B	LIC	117.84	113	4.8
KALZ	CA	FOWLER	96.7	244	25000	B1	LIC	152.17	143	9.2
KUBB	CA	MARIPOSA	96.3	242	1900	B	LIC	80.63	69	11.6
KOIT-FM	CA	SAN FRANCISCO	96.5	243	24000	B	LIC	134.97	113	22
KOIT-FM	CA	SAN FRANCISCO	96.5	243	24000	B	LIC	134.97	113	22
KWAV	CA	MONTEREY	96.9	245	18000	B	LIC	141.44	113	28.4
KLLC	CA	SAN FRANCISCO	97.3	247	4700	B	LIC	116.03	69	47
KYMX	CA	SACRAMENTO	96.1	241	50000	B	LIC	119.53	69	50.5
KSTN-FM	CA	STOCKTON	107.3	297	8100	B	LIC	77.09	15	62.1
KSQQ	CA	MORGAN HILL	96.1	241	4700	A	LIC	95.34	31	64.3
KLCA	CA	TAHOE CITY	96.5	243	6100	C1	LIC	202.42	133	69.4
KLLC	CA	SAN FRANCISCO	97.3	247	82000	B	LIC	139.95	69	71
KLLC	CA	SAN FRANCISCO	97.3	247	3000	B	LIC	139.93	69	70.9
KNOB	CA	HEALDSBURG	96.7	244	2400	A	LIC	205.27	115	90.3

Figure 2
60 dBu Gain Loss Areas

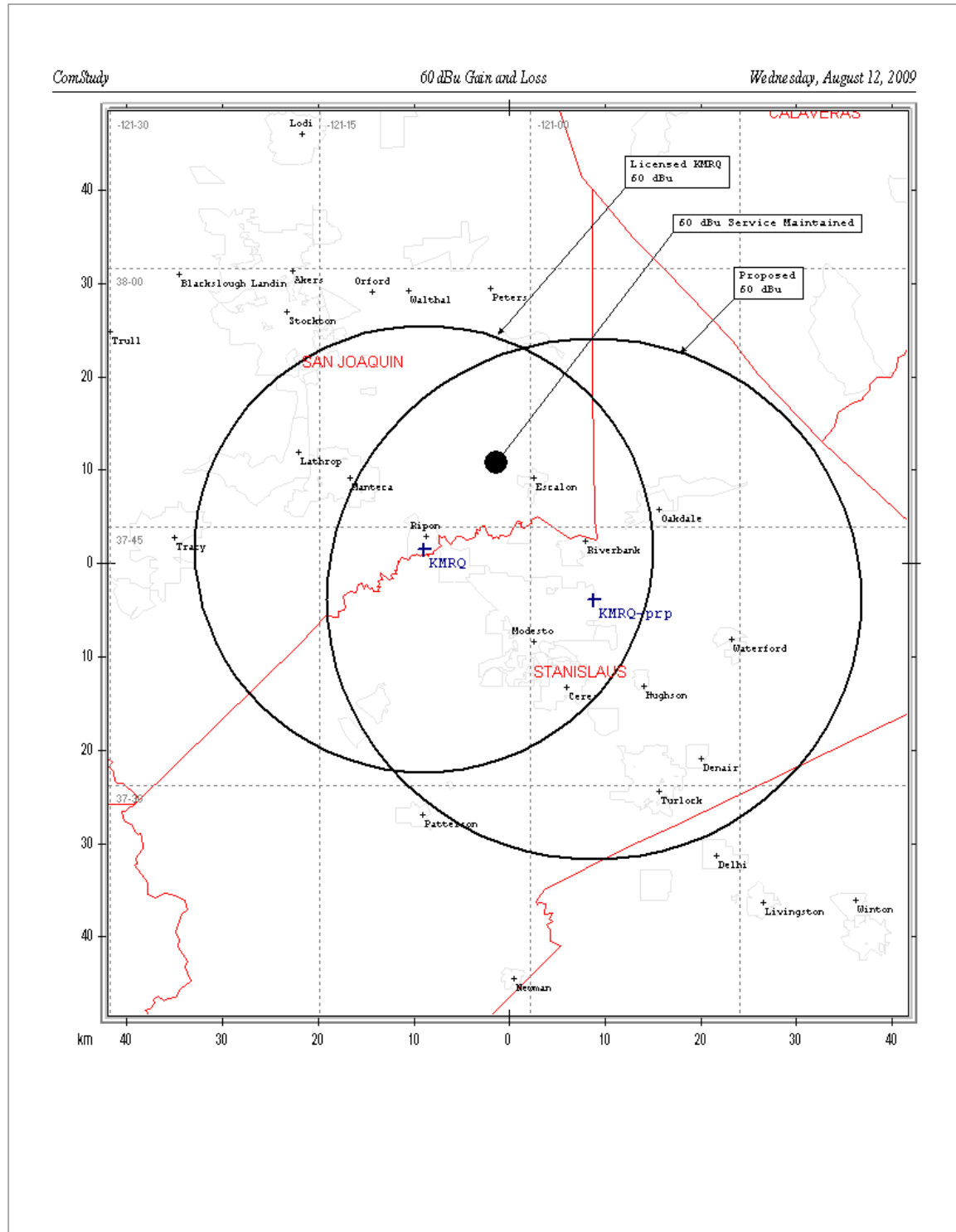


Figure 3
Tabulation of Services to Loss Area

Call Sign	City	State	Freq
KMRQ	MANTECA	CA	96.7
KMRQ-prp	Riverbank	CA	96.7
KPFA	BERKELEY	CA	94.1
KTSE-FM	PATTERSON	CA	97.1
KUOP	STOCKTON	CA	91.3
KOSO	PATTERSON	CA	93.1
KATM	MODESTO	CA	103.3
KHKK	MODESTO	CA	104.1
KYKL	TRACY	CA	90.7
KSTN-FM	STOCKTON	CA	107.3
KQOD	STOCKTON	CA	100.1
KBBU	MODESTO	CA	93.9
KYCC	STOCKTON	CA	90.1
KMIX	TRACY	CA	100.9
KVVF	SANTA CLARA	CA	105.7
KBRG	SAN JOSE	CA	100.3
KJOY	STOCKTON	CA	99.3
KOSO	PATTERSON	CA	92.9
KWIN	LODI	CA	97.7
KEAR-FM	SACRAMENTO	CA	88.1
KXPR	SACRAMENTO	CA	88.9
KHOP	OAKDALE	CA	95.1
KRVR	COPPEROPOLIS	CA	105.5
KDOW	PALO ALTO	CA	1220
KTCT	SAN MATEO	CA	1050
KGO	SAN FRANCISCO	CA	810
KNEW	OAKLAND	CA	910
KKGN	OAKLAND	CA	960
KSFB	SAN FRANCISCO	CA	1260
KEAR	SAN FRANCISCO	CA	610
KSFO	SAN FRANCISCO	CA	560
KCBS	SAN FRANCISCO	CA	740
KZSJ	SAN MARTIN	CA	1120
KSCO	SANTA CRUZ	CA	1080
KSJX	SAN JOSE	CA	1500
KSTN	STOCKTON	CA	1420
KTRB	SAN FRANCISCO	CA	860
KVIN	CERES	CA	920
KLOK	SAN JOSE	CA	1170
KWG	STOCKTON	CA	1230
KWSX	STOCKTON	CA	1280
KLIV	SAN JOSE	CA	1590
KFBK	SACRAMENTO	CA	1530
	WEST		
KCTC	SACRAMENTO	CA	1320
	RANCHO		
KSTE	CORDOVA	CA	650
KHTK	SACRAMENTO	CA	1140
KATD	PITTSBURG	CA	990

Call Sign	City	State	Freq
KRJY	SACRAMENTO	CA	1240
KCVR	LODI	CA	1570
	WEST		
KSMH	SACRAMENTO	CA	1620
KYOS	MERCED	CA	1480
KESP	MODESTO	CA	970
KCBC	RIVERBANK	CA	770
KMPH	MODESTO	CA	840
KTIQ	MERCED	CA	1660
KFIV	MODESTO	CA	1360
KLOC	TURLOCK	CA	1390

Figure 4
Map of Services to Loss Area

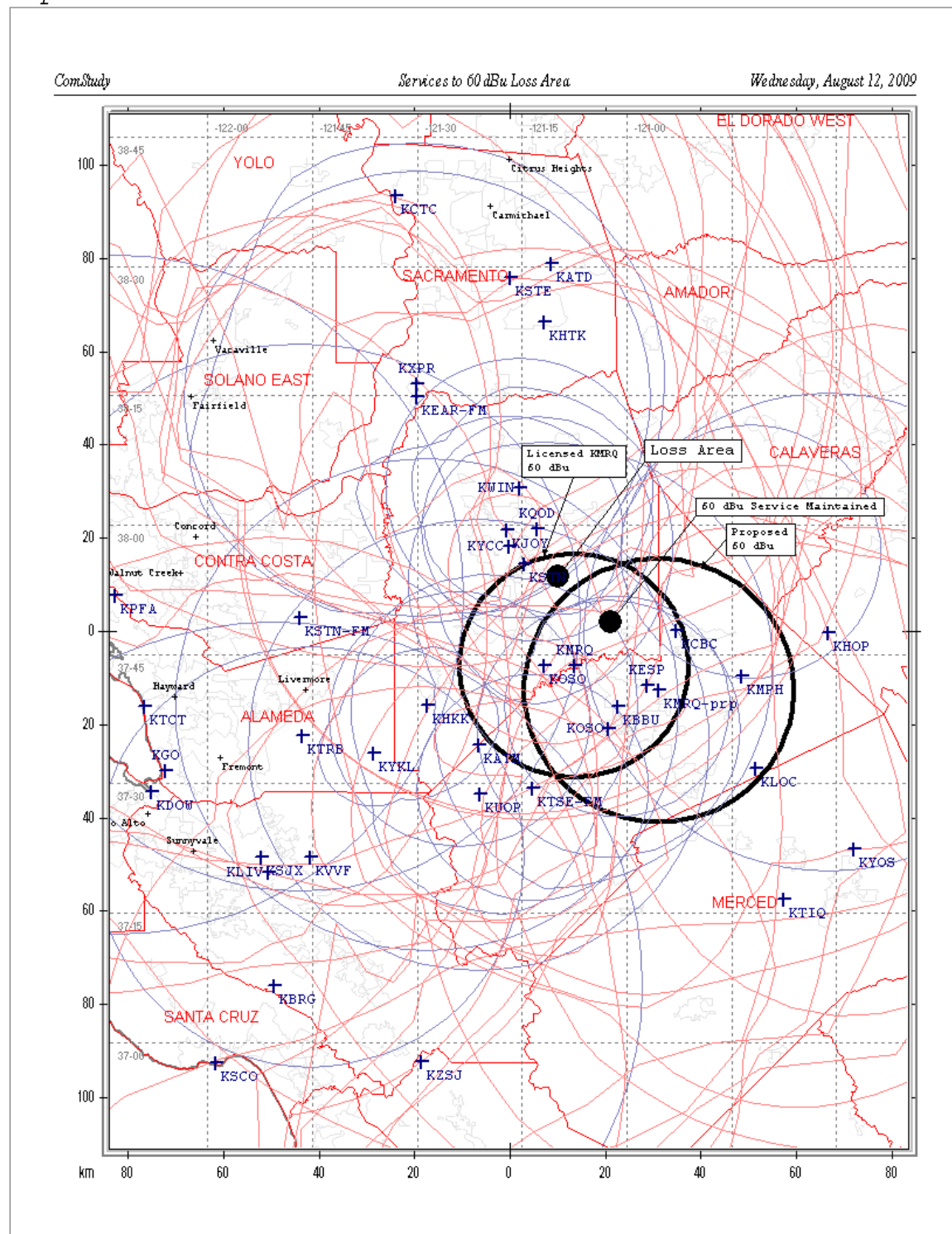


Figure 5
Present and Proposed 70 dBu Service

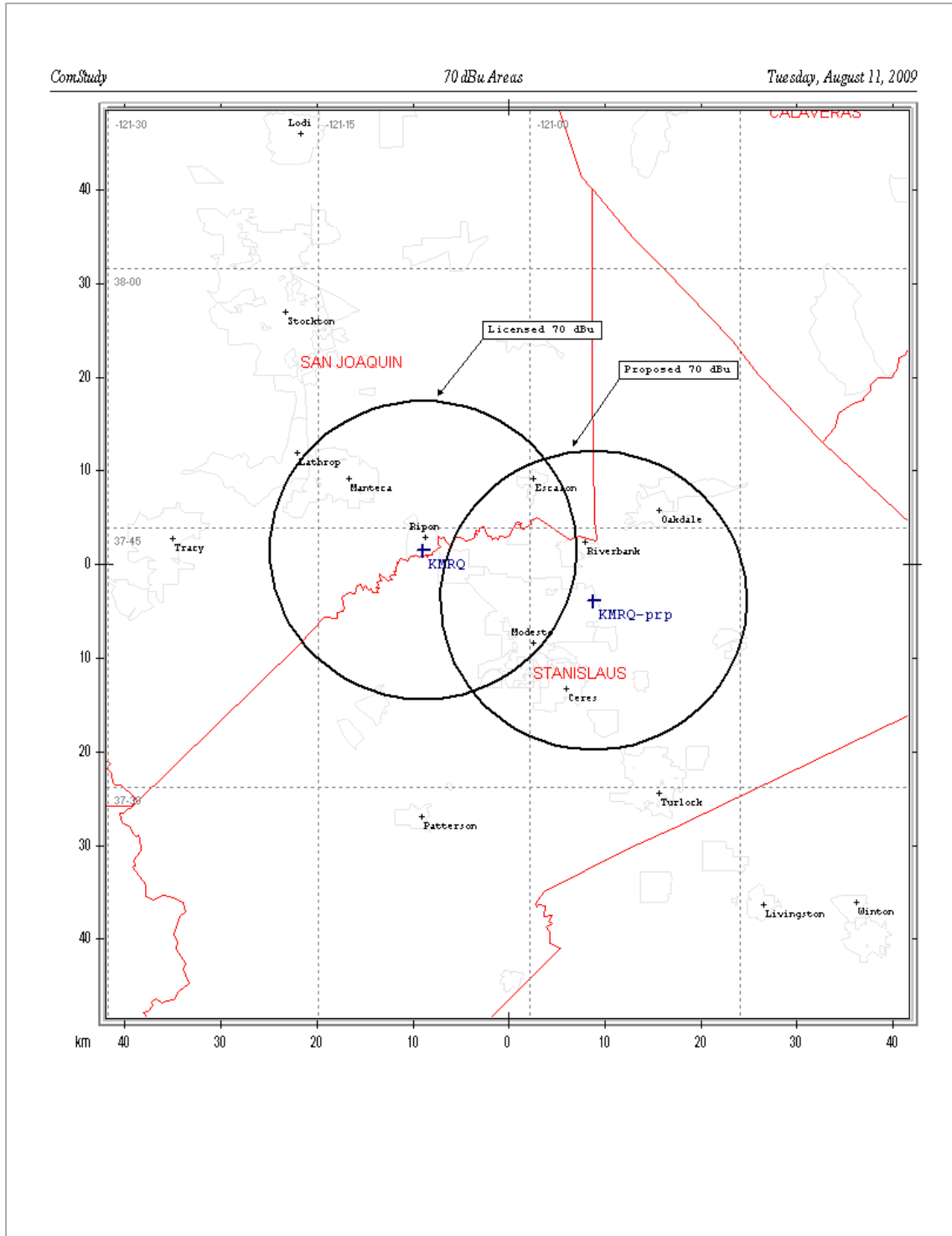


Figure 6

Map of Protected Service to Proposed Community of License

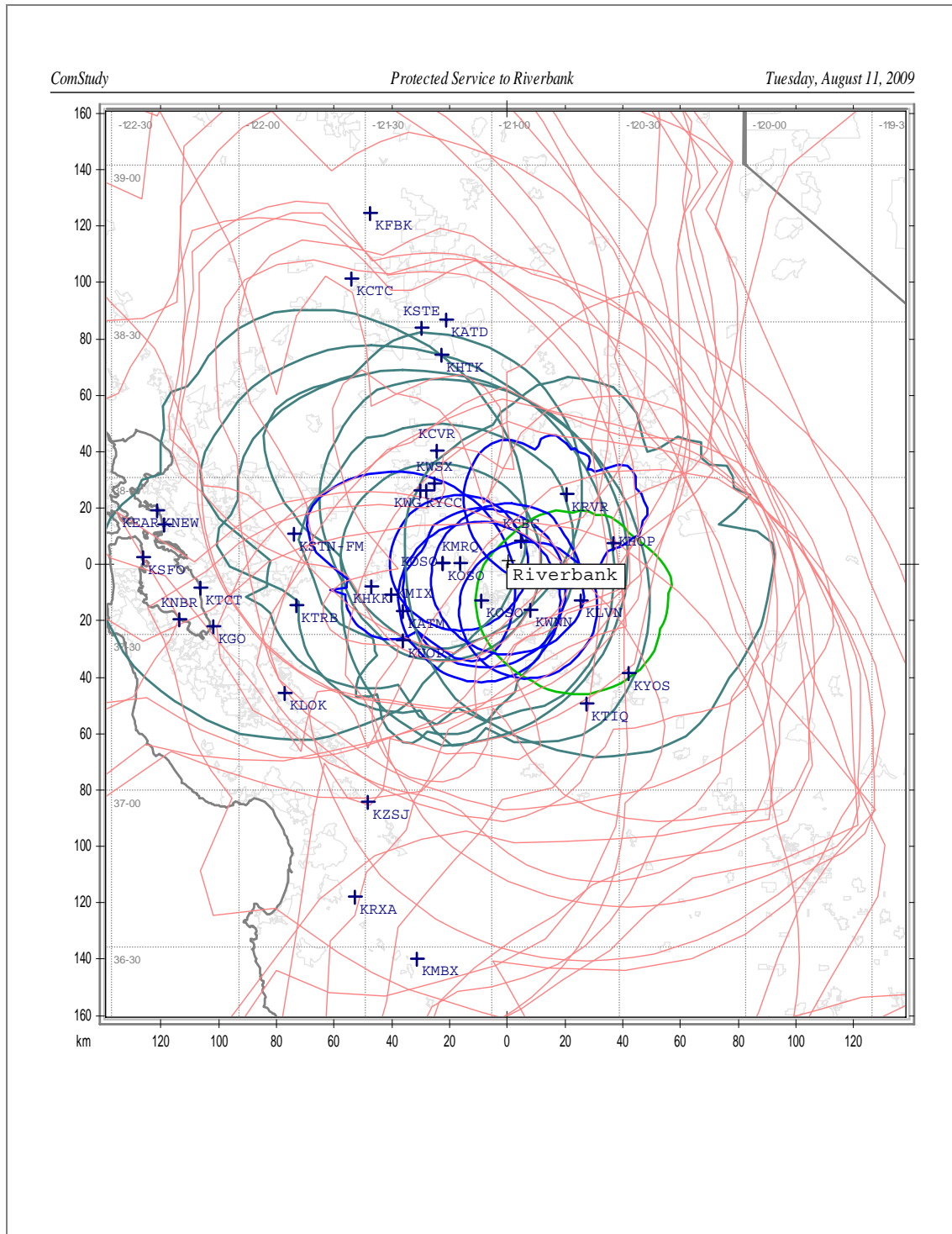


Figure 7

Table of Protected Service to Proposed Community of License

Call Sign	City	State	Freq
KMPH	MODESTO	CA	840
KOSO	PATTERSON	CA	93.1
KATM	MODESTO	CA	103.3
KFIV	MODESTO	CA	1360
KGO	SAN FRANCISCO	CA	810
KLOC	TURLOCK	CA	1390
KWG	STOCKTON	CA	1230
KCVR	LODI	CA	1570
KJSN	MODESTO	CA	102.3
KMIX	TRACY	CA	100.9
KESP	MODESTO	CA	970
KSFO	SAN FRANCISCO	CA	560
KYOS	MERCED	CA	1480
KCBS	SAN FRANCISCO	CA	740
KNBR	SAN FRANCISCO	CA	680
KATD	PITTSBURG	CA	990
KRXA	CARMEL VALLEY	CA	540
KNEW	OAKLAND	CA	910
KUOP	STOCKTON	CA	91.3
KYCC	STOCKTON	CA	90.1
KCBC	RIVERBANK	CA	770
KTRB	SAN FRANCISCO	CA	860
KRVR	COPPEROPOLIS	CA	105.5
KHKK	MODESTO	CA	104.1
KVIN	CERES	CA	920
KTCT	SAN MATEO	CA	1050
KFBK	SACRAMENTO	CA	1530
KSTN	STOCKTON	CA	1420
KZSJ	SAN MARTIN	CA	1120
	WEST		
KCTC	SACRAMENTO	CA	1320
KLOK	SAN JOSE	CA	1170
KMBX	SOLEDAD	CA	700
KWSX	STOCKTON	CA	1280
KHTK	SACRAMENTO	CA	1140
KWNN	TURLOCK	CA	98.3
KLVN	LIVINGSTON	CA	88.3
KOSO	PATTERSON	CA	92.9
KHOP	OAKDALE	CA	95.1
KMRQ	MANTECA	CA	96.7
KBBU	MODESTO	CA	93.9
	RANCHO		
KSTE	CORDOVA	CA	650
KEAR	SAN FRANCISCO	CA	610
KSTN-			
FM	STOCKTON	CA	107.3
KTIQ	MERCED	CA	1660