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ALLOCATION CONSIDERATIONS

Rubber City Radio Group  
Charlotte, Michigan

WJXQ is presently short spaced to two other stations requiring protection consideration:

WDMK	Detroit, MI	Channel 290B
WQLR	Kalamazoo, MI	Channel 293B

The present spacing between WJXQ and WQLR is 71.93 kilometers (44.70 miles), while Section 73.207 of the FCC Rules now requires a spacing of 74 kilometers for this channel relationship. This short spacing was created by the modifications made in BC Docket 80-90, which increased the required spacing for this channel relationship from 40 miles (64.4 kilometers) to 74 kilometers (46.0 miles). As a result, this short spacing imposes no restrictions on the permitted WJXQ operating facilities so long as the inter-station spacing is not reduced below its present value. The correction of the WJXQ site coordinates will very slightly reduce the spacing to WQLR, from 71.93 kilometers to 71.92 kilometers. When rounded to the nearest kilometer, pursuant to Section 73.208(c)(8) of the FCC Rules, however, both the present and corrected spacing to WQLR are considered to be 72 kilometers. Thus, the correction of the WJXQ site coordinates is not considered to reduce the spacing to WQLR and, as a result, this short spacing imposes no restrictions on the permitted WJXQ operating facilities at the corrected site coordinates.

The present spacing between WJXQ and WDMK is 117.35 kilometers, while Section 73.207 of the FCC Rules requires a spacing of 169 kilometers for this channel relationship. The correction of the WJXQ site coordinates will very slightly reduce the

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spacing to WDMK from 117.35 kilometers to 117.34 kilometers. This short spacing is a pre-1964 grandfathered short spacing which is subject to the provisions of Section 73.213(a) of the FCC Rules, which permits modifications to be made to the facilities of such a short spaced station so long as "...any area predicted to receive interference lies completely within any area presently predicted to receive . . . interference". The very slight correction in the WJXQ site coordinates, in conjunction with the minor reduction in the WJXQ effective radiated power to compensate for the associated correction of the WJXQ antenna height, results in both the predicted 54 dBu service contour and the predicted 48 dBu interfering contour for the proposed WJXQ operating facilities being essentially identical to those predicted for the presently licensed WJXQ operating facilities. As a result, the corrected WJXQ operating facilities specified in this application will only be predicted to cause interference to and receive interference from WDMK in areas which are essentially identical to the areas where such interference is presently predicted to occur. Thus, it is obvious that these corrected facilities comply with Section 73.213(a) of the FCC Rules with regard to WDMK.

The corrected facilities specified in this application fully comply with the spacing requirements outlined in Section 73.207 of the FCC Rules to all other stations requiring protection consideration.