

**Engineering Statement in Support of  
Change to the Community of License****Introduction**

Educational Media Foundation requests a community of license change for KMLU from Brownfield, Texas to McKee, Kentucky.

This statement is included to show that the proposed move to the station KMLU will comply with the 307(b) fair distribution guidelines.

**Discussion**

In the instructions for the new Form 340, the FCC describes several points that are required for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b). Those requirements have been divided into the two sections below:

**1. Minimum Requirements**

The commission has requested that any 307(b) showing contain the following minimum information:

- The number of stations licensed to the current community of license is three (3). The number of stations licensed to the proposed community of license is one (1).
- The number of stations providing service to the current community of license is 13. The number of stations providing service to the proposed community of license is 23.
- The population of the proposed community of license is 878.
- See Exhibit 23-F for licensable community information.

**2. Other Relevant Information****A. Service Area**

In order to show that the entire area that is currently served by the licensed facility of KMLU continues to be served when the proposed move is granted, several exhibits have been attached.

- Exhibit 23-A shows all facilities that serve any portion of the current KMLU construction permit's coverage area. See Exhibit 23-A1 for a station list.
- Exhibit 23-B is similar to Exhibit 23-A, however in order to make abundantly clear that the area is well served, contours that combine to provide at least 5 services over the entire current construction permit have been colored green with the extraneous contours removed. Exhibit 23-B also provides a color coded showing of the number of stations that provide service within the current construction permit contour of KMLU. As can be seen the entire area is well served by 5 or more stations, not including KMLU.

- Exhibit 23-C is a population report that corresponds to the map at Exhibit 23-B. This further shows that 100% of the area and population that are within the current construction permit contour of KMLU continue to be well served, should the proposed move be granted.

**B. Gain/Loss**

The proposed move to KMLU will make more efficient use of the FM spectrum and increase service to the public, as it will result in a vast increase in population served as illustrated by the exhibits below:

- Exhibit 23-D is a population report of the originally licensed facility for KMLU. As can be seen, the current facility serves an area of 318.26 sq. km and a population of 10,692 persons.
- Exhibit 23-E is a population report of the proposed KMLU facility. As can be seen, the proposed facility serves an area of 5732.04 sq. km and a population of 160,418 persons.

Therefore, there is an overall gain of 1701.06% (5413.78 sq. km) of the area served, and the population served increases by 1400.36% (149,726 persons).

**C. Number of Aural Services**

The proposed move to KMLU will result in preferential arrangement of facilities. The former community of license, Brownfield, Texas continues to be served by the following facilities:

FIN	Call Sign	Channel/ Freq.	Community of License
61581	KSTQ-FM	282C2	Brownfield, TX
7331	KKUB	AM/1300	Brownfield, TX
88314	KPBB	203A	Brownfield, TX

**Conclusion**

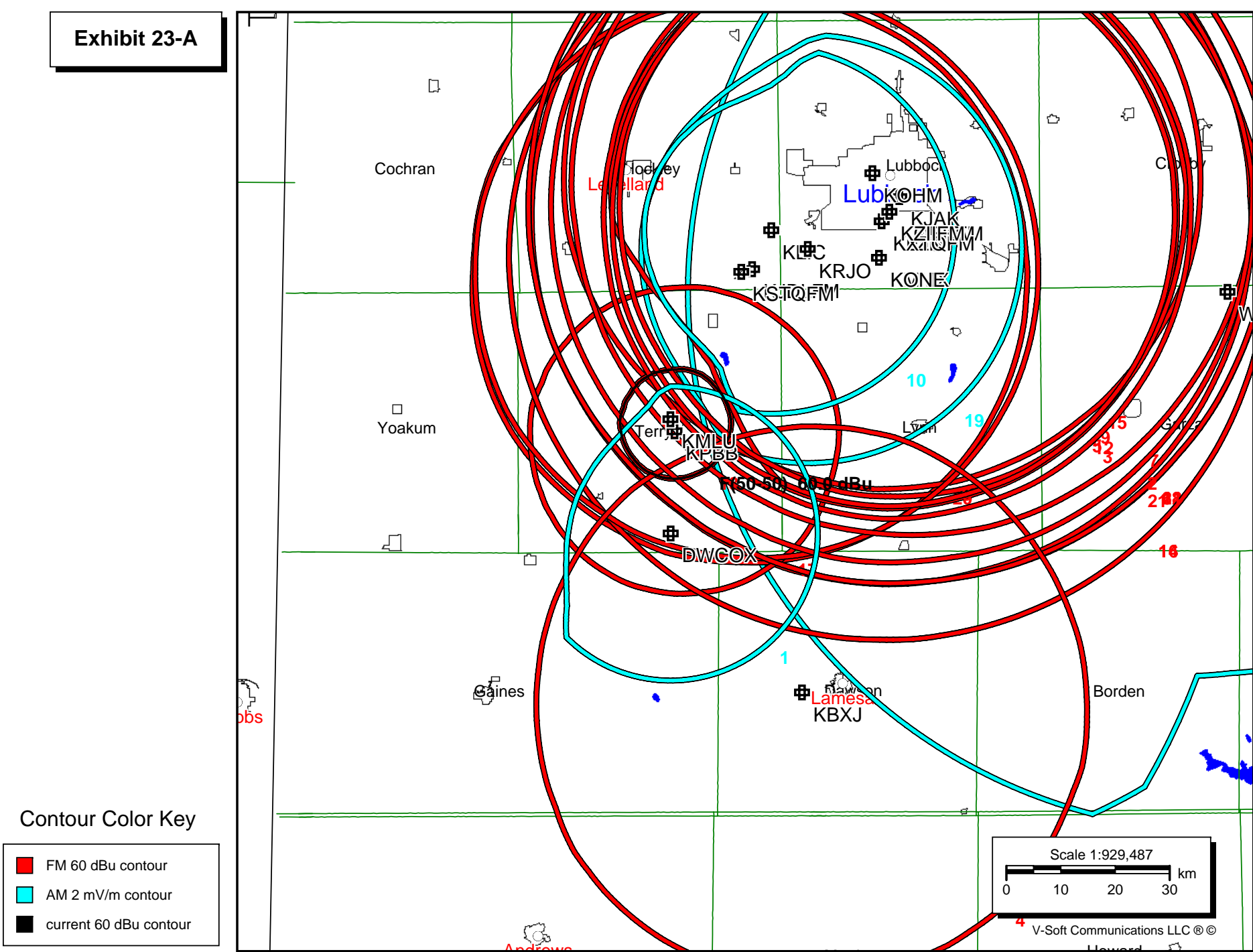
The entire area within the current licensed contour of KMLU continues to be served should the proposed facility be granted. Further it is in the public interest to grant the proposed facility since it will result in a great increase in population served.

Respectfully submitted,



Cris Baron  
Signal Development Specialist II  
Educational Media Foundation  
May 2, 2008

Exhibit 23-A



**Station List**

<b>Call Sign</b>	<b>Cls</b>	<b>City</b>	<b>ST</b>	<b>DA</b>	<b>Power</b>
KMLU	A	Brownfield	TX	No	0.13
DWCOX	AM	CAMDEN	AL	No	1
KAIQ	C1	Wolfforth	TX	No	100
KAMY	C1	Lubbock	TX	No	63
KBXJ	C2	Los Ybanez	TX	No	50
KEJS	C2	Lubbock	TX	No	34
KFMXFM	C1	Lubbock	TX	No	100
KJAK	C1	Slaton	TX	No	100
KJDLFM	C2	Levelland	TX	No	23.5
KKCL	C2	Lorenzo	TX	No	36
KLIC	AM	MONROE	LA	No	1
KLLLFM	C1	Lubbock	TX	No	100
KLZK	C2	New Deal	TX	No	32
KMMX	C1	Tahoka	TX	No	100
KOHM	C1	Lubbock	TX	No	70
KONE	C1	Lubbock	TX	No	100
KPBB	A	Brownfield	TX	No	4.5
KQBR	C1	Lubbock	TX	No	100
KRJO	AM	MONROE	LA	No	10
KSTQFM	C2	Brownfield	TX	No	50
KXTQFM	C1	Lubbock	TX	No	100
KZIIFM	C1	Lubbock	TX	No	100
WJDX	AM	JACKSON	MS	No	5

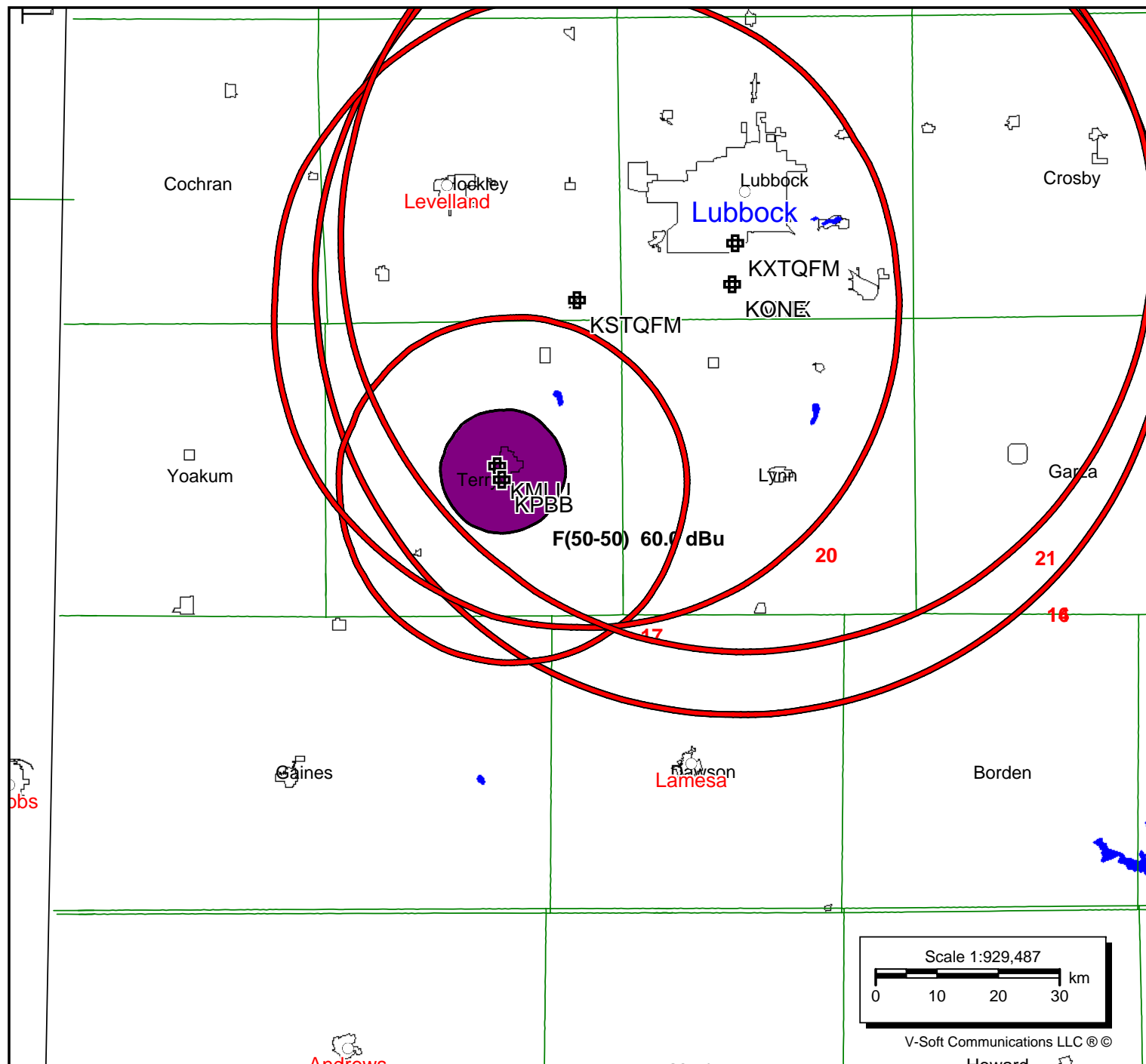
## Exhibit 23-B

### Service Color Key

- First Service
- Second Service
- Third Service
- Fourth Service
- Fifth Service

### Contour Color Key

- overlapping contour
- current contour



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**Service Count Report**

Service Count Population Report

Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
5th Service (or >)	10,692	10,692	100.0

## Population Report

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-50) FS: 60.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

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Transmitter Information:

Call Letters: KMLU

File Number: BLED20080213AHG

Latitude: 33-10-30 N

Longitude: 102-17-20 W

ERP: 0.13 kW

Channel: 214

Frequency: 90.7 MHz

AMSL Height: 1091.0 m

Elevation: 981.0 m

HAAT: 84.0 m

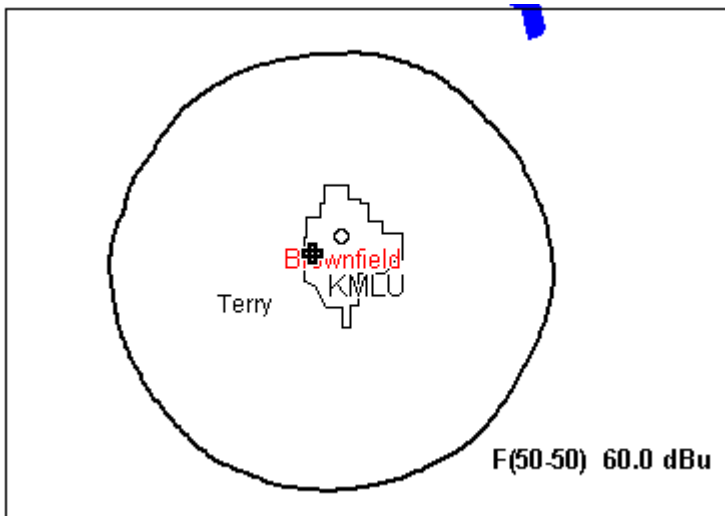
Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

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Total Population Within Contour: 10,692

Total Housing Units Within Contour: 4,236

Total Area Within Contour: 318.26 sq. km  
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## Population Report

# V-Soft Communications Population Report

## Contour Parameters:

Type: FCC Contour

F(50-50) FS: 60.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

## Transmitter Information:

Call Letters: KMLU

Latitude: 37-04-30 N

Longitude: 083-49-14 W

ERP: 50.00 kW

Channel: 207

Frequency: 89.3 MHz

AMSL Height: 517.0 m

Elevation: 384.8 m

HAAT: 164.72 m

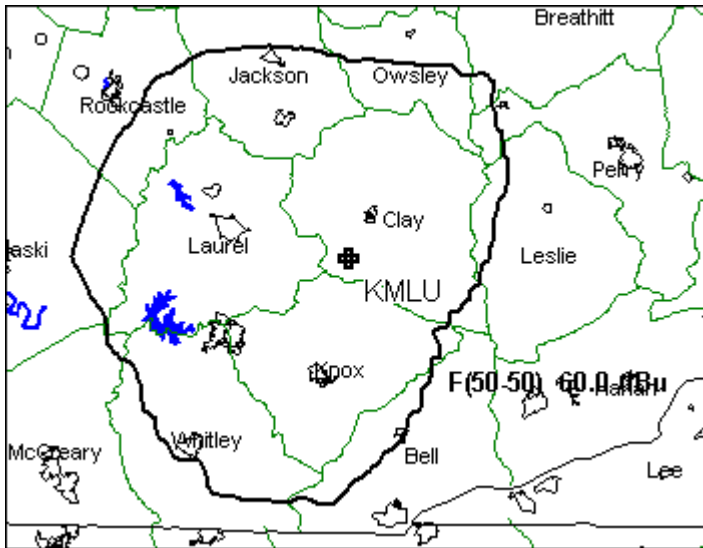
Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No

Total Population Within Contour: 160,418

Total Housing Units Within Contour: 67,806

Total Area Within Contour: 5732.04 sq. km



## **Community of License Information**

McKee, Kentucky is an established and licensable community, as shown by the fact that it presently has FM radio station WWAG licensed to it.