

MODIFY BMPH-20080331ACU
CUMULUS LICENSING LLC
KNRQ-FM RADIO STATION
CH 250C1 - 97.9 MHZ - 10.0 KW
ALOHA, OREGON
August 2010

EXHIBIT D

City of License Change Review

This application seeks to change the community of license of the KNRQ-FM from Tualatin, Oregon to Aloha, Oregon using the procedures outlined in MB Docket 05-210, released November 29, 2006. This is a review of the proposed change, which demonstrates compliance with the Commission's rules and procedures for a change. It is noted that removal of KNRQ-FM from Tualatin, Oregon will not remove the only existing service, as KNRQ-FM is not operational in Tualatin and, therefore, provides only theoretical service to Tualatin.¹

As indicated in Exhibit A, at the proposed allocation site at Aloha, Oregon, Channel 250C1 meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207, based on the proposed channel changes. The proposed allotment at Aloha, Oregon is mutually exclusive with the present KNRQ-FM license on Channel 250C at Eugene, Oregon and the outstanding KNRQ-FM permit at Tualatin. As a result of the proposed change, the community of Aloha, Oregon will receive a first local station.

1) KNRQ-FM continues to operate its licensed facility in Eugene, Oregon.

Therefore, Cumulus proposes the following:¹

Aloha, Oregon

Present	Proposed
None	250C1

Tualatin, Oregon

Present	Proposed
250C1	None

The proposed allocation site for Channel 250C1 at Aloha, Oregon is slightly removed from the present permit site for KNRQ-FM at Tualatin, Oregon to accommodate the change in community of license. The theoretical 60 dBu contour of proposed allocation site encompasses the 60 dBu from the KNRQ-FM CP site, as shown on Exhibit D1.² A maximum Class C2 facility from the present KNRQ-FM CP site at Tualatin, Oregon would provide a 60 dBu contour to 1,934,494 persons in 8,560.3 square kilometers.³ The proposed allotment site for Channel 250C1 at Aloha, Oregon would provide a 60 dBu contour to 2,184,813 persons in 16,376.5 square kilometers.⁴ The relocation will create a gain of service to 250,319 persons in 7,816.2 square kilometers, with no resulting loss. A map depicting the proposed actual service contours of the proposed KNRQ-FM at Aloha, Oregon from the implementation site is attached

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- 1) The remaining channel changes needed for the implementation of the KNRQ-FM change of community are not listed here, but are included in the counterproposal, attached as Exhibit E.
 - 2) The 60 dBu contours are depicted based on maximum facilities for the respective classes without consideration of terrain.
 - 3) All allocation comparison data is based on uniform terrain and 2000 US Census population.
 - 4) A 70 dBu contour from the proposed KNRQ-FM allocation site will provide service to 1,910,163 persons in 7,856.9 square kilometers (assuming uniform terrain). See Exhibit A5.

as Exhibit D2. The proposed KNRQ-FM facility will provide a 60 dBu service to 1,980,796 persons in 11,491.8 square kilometers and a 70 dBu service to 1,788,962 persons in 4,798.4 square kilometers (assuming actual terrain conditions).

As a result of the relocation, only a gain area is created. Exhibit D3 is a depiction of the full-time services in the theoretical 60 dBu contour of KNRQ-FM (from the allocation site) at Aloha. There are no white or gray service areas which will receive service from the upgraded KNRQ-FM. There are also no under-served areas which would receive service from the upgraded KNRQ-FM.⁵ A tabulation of the stations providing service to the gain area is attached as Exhibit D4.⁶

Attached as Exhibit D5 is a map showing the licensed stations which provide protected service to the community of Aloha, Oregon.⁷ A tabulation of the stations providing protected service to Aloha, Oregon is attached as Exhibit D6. Attached as Exhibit D7 is a map showing

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- 5) There are at least five full time services within the projected 60 dBu of KNRQ-FM from the allocation site.
 - 6) There are additional stations providing service, but they are not shown, as the area is considered well served. To determine services, commercial and non-commercial FM stations in the area were reviewed. Full-time Class A stations were considered based on there 0.5 mV/m nighttime ground wave contour. All other AM stations providing daytime service were based on there 0.5 mV/m contour. Nighttime interference free contours of all AM's, except for Class A, were considered, if the contour provided service to any under served areas. For FM commercial stations, maximum facilities were used for each Class, except Class A facilities. Some Class A stations were considered 3.0 kilowatt Class A stations, while others were depicted as 6.0 kilowatt Class A stations, based on their operating facilities, or spacing review. Class C FM stations were considered, based on the reference contour determined by the station's licensed power and height, at either minimum Class C (83.5 kilometers) or licensed facility if greater. Any non-commercial FM station's 60 dBu reference contour was determined from its licensed facility, based on the reference distance, which was determined by power and HAAT of the facility. All FM contours assumed uniform terrain.
 - 7) As the population of Aloha is greater than 2,500 persons, the 2.0 mV/m contour for AM stations was depicted.

the licensed stations which provide protected service to the community of Tualatin, Oregon.⁸ A tabulation of the stations providing protected service to Tualatin, Oregon is attached as Exhibit D8.

It is noted that both the community of Aloha, Oregon and Tualatin, Oregon are located within the Portland, Oregon Urbanized Area, as defined by the 2000 U.S. Census. Based on the foregoing, it is believed that this proposal is in compliance with the Commission's rules.

8) As the population of Tualatin, Oregon is greater than 2,500 persons, the 2.0 mV/m contour for AM stations was depicted.

Allocation Site

Latitude: 45-29-20 N
Longitude: 122-41-40 W
ERP: 100.00 kW
Channel: 250C1
Frequency: 97.9 MHz
AMSL Height: 392.87 m
Horiz. Pattern: Omni
Prop Model : None
60 dBu pop. : 2,184,813 (2000)
60 dBu area : 16,376.5 sq. km.

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KNRQ-FM ALOHA, OR 60 dBu

KNRQ-FM CP

BMPH-20080331ACU
Latitude: 45-31-21 N
Longitude: 122-44-45 W
ERP: 3.70 kW
Channel: 250C2
Frequency: 97.9 MHz
AMSL Height: 561.0 m
Horiz. Pattern: Omni
Prop Model: None
60 dBu pop. : 1,934,494 (2000)
60 dBu area : 8,560.3 sq. km.

Cannon Beach

Manzanita

Rockaway Beach

Bay City Tillamook

Tillamook

101

EXHIBIT D1

MODIFY BMPH-20080331ACU
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Wahkiakum

Clatskanie

Columbia

Vernonia

Scappoose

North Platte

Forest Grove

Gaston

Yamhill

Carlton

Newberg

McMinnville

Amity

Sheridan

Polk Dallas

Falls City

Monmouth

Aumsville

Stayton

Lyons

Mill City

Jefferson

Scio

Cowlitz

Rainier

Kelama

Woodland

Saint Helens

Yacolt

Clark

Battle Ground

Salmon Creek

Vancouver

North Platte

Forest Grove

Gaston

Yamhill

Carlton

Newberg

McMinnville

Amity

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Polk Dallas

Falls City

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Lyons

Mill City

Jefferson

Cowlitz

Rainier

Kelama

Woodland

Saint Helens

Yacolt

Clark

Latitude: 45-31-21 N
Longitude: 122-44-45 W
ERP: 10.00 kW
Channel: 250C1
Frequency: 97.9 MHz
AMSL Height: 561.0 m
Horiz. Pattern: Omni
Prop Model : FCC
60 dBu pop. : 1,980,796 (2000)
60 dBu area : 11,491.8 sq. km.
70 dBu pop. : 1,788,962 (2000)
70 dBu area : 4,798.4 sq. km.

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60 dBu (1.0 mV/m)

70 dBu (3.16 mV/m)

EXHIBIT D2

**MODIFY BMPH-20080331ACU
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August 2010**

Scale 1:1,000,000

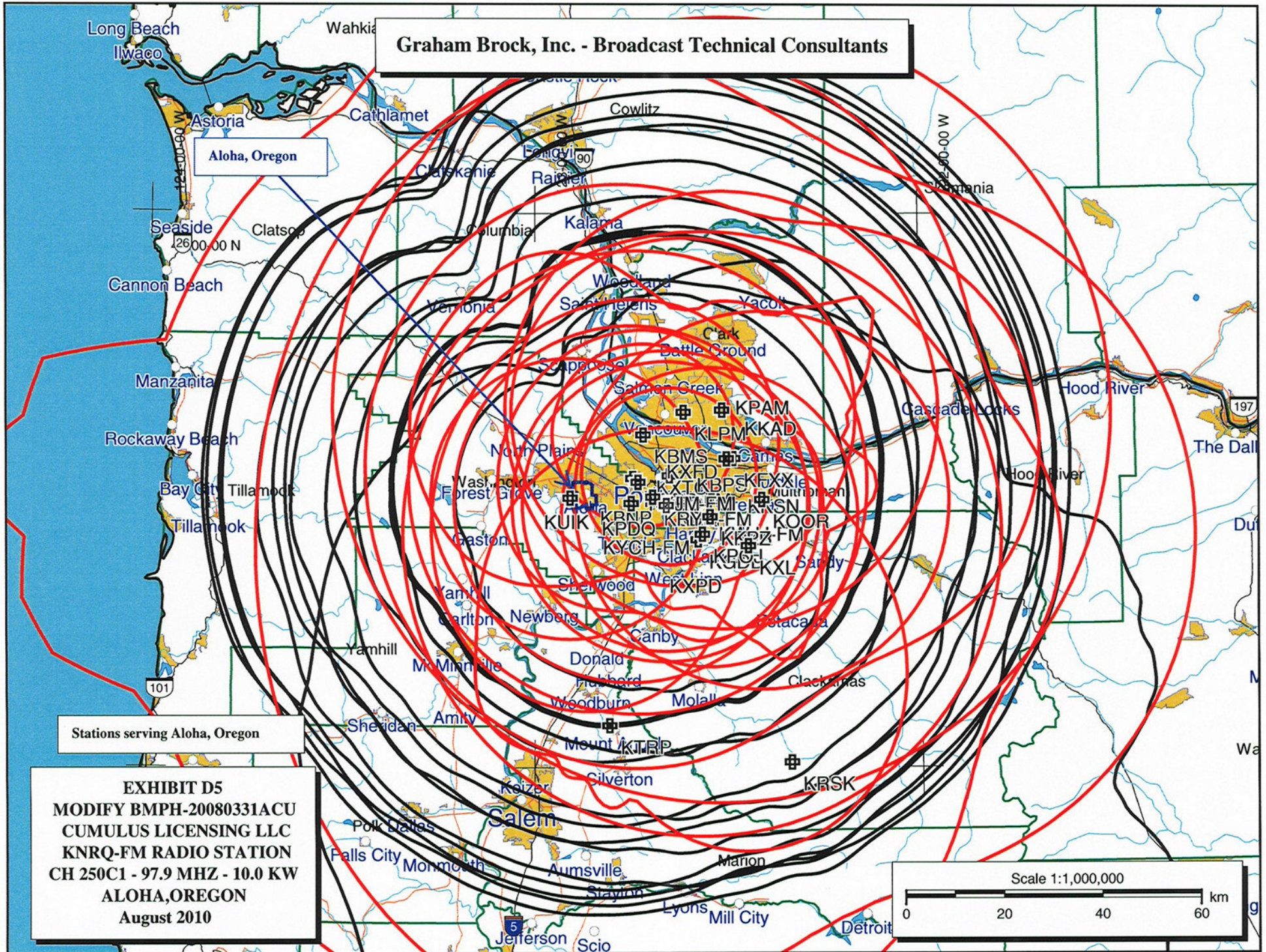
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EXHIBIT D4

FM Stations Serving Gain Area

<u>Call Sign</u>	<u>CH/Class</u>	<u>City/State</u>
KXTG	238C	Portland, Oregon
KYCH-FM	246C	Portland, Oregon
KGON	222C	Portland, Oregon
KWJJ-FM	258C1	Portland, Oregon
KPDQ-FM	230C1	Portland, Oregon
KKRZ	262C	Portland, Oregon
KKCW	277C	Beaverton, Oregon

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EXHIBIT D6

Stations Provide Service to Aloha, Oregon

AM Stations

<u>Call Sign</u>	<u>Freq</u>	<u>City/State</u>
* KBMS	1480 kHz	Vancouver, WA
KBNP	1410 kHz	Portland, OR
* KBPS	1450 kHz	Portland, OR
KDZR	1640 kHz	Lake Oswego, OR
KEX	1190 kHz	Portland, OR
KFXX	1080 kHz	Portland, OR
KGDD	1520 kHz	Oregon City, OR
KKAD	1550 kHz	Vancouver, WA
KKPZ	1330 kHz	Portland, OR
KKSN	910 kHz	Vancouver, WA
KLPM	1150 kHz	Portland, OR
* KOOR	1010 kHz	Milwaukie, OR
KPAM	860 kHz	Troutdale, OR
KPDQ	800 kHz	Portland, OR
KPOJ	620 kHz	Portland, OR
KTRP	1130 kHz	Mount Angel, OR
KUIK	1360 kHz	Hillsboro, OR
KXFD	970 kHz	Portland, OR
KXL	750 kHz	Portland, OR
KXPD	1040 kHz	Tigard, OR

* Serves part of Aloha, Oregon.

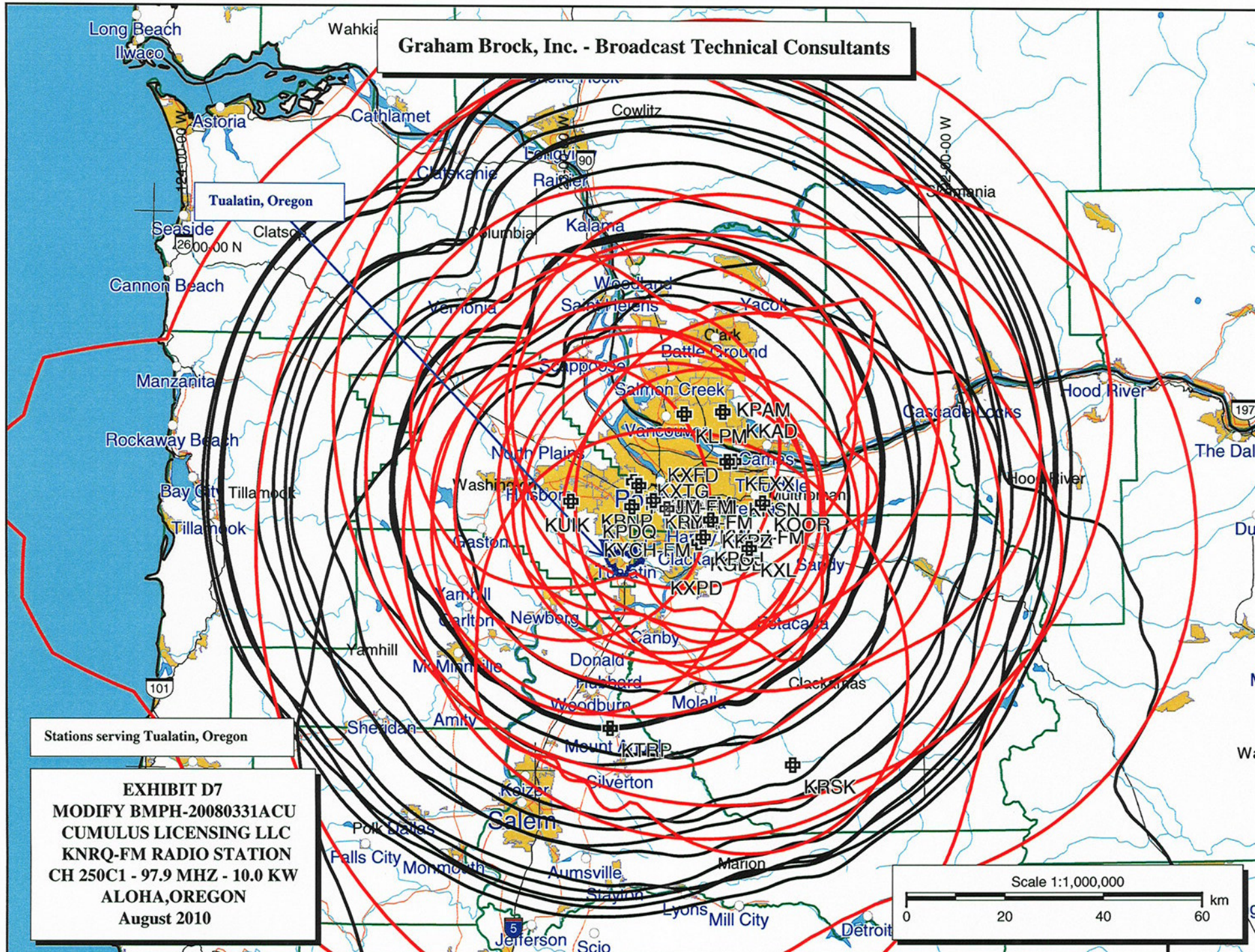
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EXHIBIT D6 (continued)

FM Stations

<u>Call Sign</u>	<u>CH/Class</u>	<u>City/State</u>
KBOO	214C1	Portland, OR
KBVM	202C2	Portland, OR
KFBW	290C1	Vancouver, WA
KFIS	281C2	Scappoose, OR
KGON	222C	Portland, OR
KINK	270C	Portland, OR
KKCW	277C	Beaverton, OR
KKRZ	262C	Portland, OR
KLTH	294C	Lake Oswego, OR
KMHD	206C1	Gresham, OR
KNRK	234C2	Camas, WA
KOPB-FM	218C0	Portland, OR
KPDQ-FM	230C1	Portland, OR
KQAC	210C2	Portland, OR
KRSK	286C	Salem, OR
KRYP	226C3	Gladstone, OR
KUFO-FM	266C	Portland, OR
KUPL-FM	254C1	Portland, OR
KWJJ-FM	258C1	Portland, OR
KXJM	298C0	Banks, OR
KXTG	238C	Portland, OR
KYCH-FM	246C	Portland, OR

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EXHIBIT D8

Stations Provide Service to Tualatin, Oregon

AM Stations

<u>Call Sign</u>	<u>Freq</u>	<u>City/State</u>
KBPN	1410 kHz	Portland, OR
KDZR	1640 kHz	Lake Oswego, OR
KEX	1190 kHz	Portland, OR
KFXX	1080 kHz	Portland, OR
KGDD	1520 kHz	Oregon City, OR
KKAD	1550 kHz	Vancouver, WA
KKPZ	1330 kHz	Portland, OR
KKSN	910 kHz	Vancouver, WA
KLPM	1150 kHz	Portland, OR
KOOR	1010 kHz	Milwaukie, OR
KPAM	860 kHz	Troutdale, OR
KPDQ	800 kHz	Portland, OR
KPOJ	620 kHz	Portland, OR
KTRP	1130 kHz	Mount Angel, OR
KUIK	1360 kHz	Hillsboro, OR
KXFD	970 kHz	Portland, OR
KXL	750 kHz	Portland, OR
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EXHIBIT D8 (continued)

FM Stations

<u>Call Sign</u>	<u>CH/Class</u>	<u>City/State</u>
KBOO	214C1	Portland, OR
KBVM	202C2	Portland, OR
KFBW	290C1	Vancouver, WA
KFIS	281C2	Scappoose, OR
KGON	222C	Portland, OR
KINK	270C	Portland, OR
KKCW	277C	Beaverton, OR
KKRZ	262C	Portland, OR
KLTH	294C	Lake Oswego, OR
KMHD	206C1	Gresham, OR
KNRK	234C2	Camas, WA
KOPB-FM	218C0	Portland, OR
KPDQ-FM	230C1	Portland, OR
KQAC	210C2	Portland, OR
KRSK	286C	Salem, OR
KRYP	226C3	Gladstone, OR
KUFO-FM	266C	Portland, OR
KUPL-FM	254C1	Portland, OR
KWJJ-FM	258C1	Portland, OR
KXJM	298C0	Banks, OR
KXTG	238C	Portland, OR
KYCH-FM	246C	Portland, OR

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Allocation Site
Latitude: 45-29-20 N
Longitude: 122-41-40 W
ERP: 100.00 kW
Channel: 250C1
Frequency: 97.9 MHz
AMSL Height: 392.87 m
Horiz. Pattern: Omni
Prop Model : None

KNRQ-FM Proposed
Latitude: 45-31-21 N
Longitude: 122-44-45 W
ERP: 10.00 kW
Channel: 250C1
Frequency: 97.9 MHz
AMSL Height: 561.0 m
Horiz. Pattern: Omni
Prop Model : FCC

70 dBu (3.16 mV/m) radius

70 dBu (3.16 mV/m) application

Portland, Oregon Urbanized Area

EXHIBIT D9
MODIFY BMPH-20080331ACU
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ALOHA, OREGON
August 2010

