

Joint Exhibit
Community of License Change – Section 307(b)

Capstar TX Limited Partnership, the licensee of WPKX(FM), Enfield, Connecticut, Facility ID No. 46965 (“WPKX”), and Radio License Holding CBC, LLC, the licensee of WMAS-FM, Springfield, Massachusetts, Facility ID No. 36543 (“WMAS-FM,” and together with WPKX, the “Stations”), are submitting simultaneous contingent applications for construction permits for minor modifications to specify, *inter alia*, new communities of license for the Stations (the “Applications”). The Applications request: (1) a construction permit for the minor modification of WPKX to specify operation on Channel 250A at Windsor Locks, Connecticut, in lieu of operation on Channel 250A at Enfield, Connecticut, and (2) a construction permit for the minor modification of WMAS-FM to specify operation on Channel 234B at Enfield, Connecticut, in lieu of operation on Channel 234B at Springfield, Massachusetts.

This exhibit, being filed with each of the Applications, together with the Technical Exhibits to the Applications, demonstrate that the proposed community of license changes constitute a preferential arrangement of allotments or assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)). Furthermore, as set forth in the respective Technical Exhibits, the facilities specified in each of the Applications are mutually exclusive, as defined in Section 73.207 of the Commission’s Rules, with the current assignment of the respective Station. The applicants will comply with the local public notice provisions of Sections 73.3580(c)(3), 73.3580(d)(3), and 73.3580(f) of the Commission’s Rules,

and understand that the exception contained in Section 73.3580(e) of the Commission's Rules does not apply to an application proposing to change the community of license of an FM station.

As confirmed in the Technical Exhibit to the WPKX Application, there is an assignment/allotment site for the facility at the proposed community of license that fully complies with Sections 73.207 and 73.315 of the Commission's Rules without resort to Sections 73.213 or 73.215 of the Commission's Rules.

As to the WMAS-FM Application, no technical facility changes are proposed; however, based on the registered tower data, the WMAS-FM Application proposes a slight coordinate correction for the existing tower site as well as a slight reduction in height above average terrain. However, as indicated in the Technical Exhibit to the WMAS-FM Application, the WMAS-FM assignment/allotment site is less than the distance specified in Section 73.207 due to existing Section 73.213(a) short-spacings with two other stations and an existing Section 73.215 short-spacing to a third station, WBAR-FM, which initiated the short-spacing to WMAS-FM. A waiver of Section 73.3573(g)(4) is respectfully requested as the WMAS-FM Application conforms with the policy set forth in *Newnan and Peachtree City, Georgia*, 1/ in regards to modifications of short-spaced stations. Specifically, with no actual change of location (just a coordinate correction), nor change in class, no new short-spacings will be created, no existing short-spacings will be exacerbated (based on Commission rounding policy), and the

1/ 7 FCC Rcd 6307 (Chief, Allocations Branch, MMB 1992) ("*Newnan and Peachtree City*"); see also *Worcester and Westborough, Massachusetts*, 18 FCC Rcd 23750 [¶ 3] (Ass't Chief, Audio Division 2003) ("The Commission now allows a station to change its community of license despite the presence of pre-1964 and pre-1989 'grandfathered' short-spacings and those permitted under Section 73.215 of the Commission's Rules."); see also *Killeen and Cedar Park, Texas*, 15 FCC Rcd 1945, 1949 (Chief,

potential for interference between the currently short-spaced stations will not be increased from the WMAS-FM assignment/allotment site. Thus, this situation is analogous to the example given by the Media Bureau qualifying for waiver of Section 73.3573(g)(4). ^{2/} Pursuant to such a waiver, the Applications may be processed as minor modification applications pursuant to Section 73.3573(g) of the Commission's Rules.

In determining whether a proposed community of license change constitutes a preferential arrangement of allotments under Section 307(b) of the Act, the Commission considers whether the proposal would serve one or more of the Commission's four priorities. ^{3/} Here, grant of the Applications would further the third priority by authorizing a first local aural transmission service at Windsor Locks, Connecticut. The communities of Enfield, Connecticut, and Springfield, Massachusetts, will continue to have local aural transmission service as well as multiple received aural transmission services. ^{4/} Thus, the Applications constitute a preferential arrangement of allotments under Section 307(b) as compared to the existing

Allocations Branch, MMB 2000) (a station that did not initiate a short-spacing under Section 73.215 allowed to change its community of license).

^{2/} See *Media Bureau Offers Example to Clarify the Treatment of Applications and Rule Making Petitions Proposing Community of License Changes, Channels Substitutions, and New FM Allotments*, Public Notice, 22 FCC Rcd 6852, 6855 (at Example 15) (MB 2007); see also *WNOW-FM, Bessemer City, North Carolina*, 23 FCC Rcd 8412, 8415-17 (MB 2008) (granting waiver of Section 73.3573(g)(4) for grandfathered short-spaced assignment site meeting *Newnan and Peachtree City* criteria), *app. for review pending*.

^{3/} See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) ("FM Assignment Policies"). The four priorities are: (i) one full-time aural reception service to a community; (ii) a second full-time aural reception service to a community; (iii) one local transmission service to a community; or (iv) other public interest factors. The second and third criteria have equal priority. *Id.* at 91. See also *Report and Order, In the Matter of Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, 21 FCC Rcd 14212, 14218 [¶ 10] (2006) (Section 307(b) priorities and policies used by Commission since 1982 continue to apply under new application procedures).

^{4/} See Technical Exhibits.

allotments/assignments.

By allotment of Channel 250A to Enfield, Connecticut, the Commission has already determined that Enfield, Connecticut, is a community suitable for allotment purposes. Commission precedent holds that a community that is a Census Designated Place *or* that is incorporated presumptively qualifies as a community for allotment purposes and thereby merits its own local transmission service. 5/ Enfield continues to be a community suitable for allotment purposes. Enfield is listed in the U.S. Census with a 2000 population of 45,212. 6/ Enfield was incorporated by the Colony of Massachusetts in 1683 and was annexed to Connecticut in 1749. 7/ Enfield is governed by an elected Town Council (comprised of eleven members) 8/ whom appoint the Town Manager. 9/ Enfield provides many municipal services to its residents, including emergency medical services, police and fire services, a library, road maintenance, solid waste collection and disposal, water pollution control, recreation, a senior center, adult day-care, a meal program, and youth services. 10/ Enfield has two post office locations and its own zip

5/ See, e.g., *Cleveland and Ebenezer, Mississippi R&O*, 10 FCC Rcd 8807, 8808 [¶ 6] (MMB 1995) (“The Commission’s long standing policy is to allot channels to communities composed of geographically identifiable population groupings. This requirement is generally satisfied if the community is either incorporated or listed in the U.S. Census.”); see also *Reydon, Oklahoma R&O*, 18 FCC Rcd 3222, 3222 [¶ 2] (MB 2003).

6/ See Profile of General Demographic Characteristics for Enfield town, Hartford County, Connecticut, U.S. Census Bureau, Census 2000, at <http://censtats.census.gov/data/CT/0600900325990.pdf> (copy at Attachment 1).

7/ See Town of Enfield, Connecticut Web Site, About Enfield, at <http://enfield-ct.gov/content/47/686/> (copy at Attachment 2).

8/ See *id.*, Town Council, at <http://www.enfield-ct.gov/content/6822/default.aspx> (copy at Attachment 3).

9/ See *id.*, Town Charter, Chapter IV, Section 1, at <http://www.enfield-ct.gov/content/91/148/3938.aspx>.

10/ See *id.*, Departments, at <http://www.enfield-ct.gov/content/91/default.aspx> (copy at Attachment 4).

code (06082). 11/

While the principal community contour of WMAS-FM serving Enfield, Connecticut, and operating at maximum facilities from the proposed reference coordinates, would encompass 82.8 percent of the Springfield, Massachusetts Urbanized Area with a 70 dBu contour, 12/ Commission precedent holds that a “*Tuck*” analysis is not required because, as set forth in the Technical Exhibit, the 70 dBu contour of WMAS -FM pursuant to its current authorization already encompasses that same percentage of the Springfield, Massachusetts Urbanized Area. 13/ Moreover, as specified in the Technical Exhibit, a majority of Enfield (83.6 percent) is located within the Springfield, Massachusetts Urbanized Area.

Windsor Locks, Connecticut, also is a community suitable for allotment purposes. As noted above, Commission precedent holds that a community that is a Census Designated Place *or* that is incorporated presumptively qualifies as a community for allotment purposes and thereby merits its own local transmission service. 14/ Windsor Locks qualifies under both criteria: it was recognized in the 2000 Census with a population of 12,043, 15/ and it was

11/ See United States Postal Service Web site, at http://usps.whitepages.com/post_office/search?d=5&z=06082 (copy at Attachment 5) and http://zip4.usps.com/zip4/zcl_1_results.jsp (copy at Attachment 6).

12/ See WMAS-FM Technical Exhibit.

13/ See, e.g., *Greeley and Broomfield, Colorado*, 15 FCC Rcd 9419 at 9419 [¶ 2] (Chief, Allocations Br. 2000) (no *Tuck* analysis required for community of license change when 70 dBu contour already placed over majority of urbanized area); *Durant, Oklahoma and Tom Bean, Texas*, 20 FCC Rcd 4315, 4315 [¶ 3] (Chief, Allocations Br. 2005) (no *Tuck* analysis required for community of license change when 70 dBu contour already placed over 100% of urbanized area).

14/ See *supra* note 5.

15/ See Profile of General Demographic Characteristics for Windsor Locks CDP, Connecticut, U.S. Census Bureau, Census 2000 at <http://censtats.census.gov/data/CT/1600987140.pdf> (copy at Attachment 7).

incorporated in 1854. 16/

As noted above, WPKX's current assigned community, Enfield, is primarily (83.6 percent) located within the Springfield, Massachusetts Urbanized Area. As set forth in the Technical Exhibit, the proposed community for WPKX, Windsor Locks, is located entirely within the Springfield, Massachusetts Urbanized Area. However, the proposed principal community contour of WPKX, either for the Channel 250A allotment at Windsor Locks, or as proposed in the WPKX Application, does not encompass a majority of the Springfield, Massachusetts Urbanized Area (or any other Urbanized Area) with a 70 dBu contour. 17/ Insofar as there is no new urbanized area impacted, no "Tuck" analysis is required here. 18/ In any event, the indicia of community status that warrant an allotment for Windsor Locks also fulfill a majority of the *Tuck* factors. Therefore, while no *Tuck* determination is needed, for a comprehensive record, this exhibit also addresses the *Tuck* factors while documenting the community status of Windsor Locks.

In a *Tuck* analysis, the Commission considers: (1) the extent to which the station will provide service to the entire urbanized area; (2) the relative populations and proximity of the suburban and central city of the urbanized area; and (3) the independence of the proposed community to the urbanized area. 19/ The latter, and most important consideration, is further refined to eight factors: (1) the extent to which the community residents work in the larger

16/ See Town of Windsor Locks Web site – Town Clerk, at <http://www.windsorlocksct.org/page.php?pid=22> (copy at Attachment 8).

17/ See WPKX Technical Exhibit.

18/ See, e.g., *Worcester and Westborough, Massachusetts*, 18 FCC Rcd at 23751 [¶ 3] (present and proposed communities located in same Urbanized Area; no *Tuck* analysis required).

metropolitan area, rather than the proposed community; (2) whether the smaller community has its own newspaper or other media coverage; (3) whether community leaders and residents perceive the proposed community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the proposed community has its own local government and elected officials; (5) whether the smaller community has its zip code and its own telephone book provided by a local telephone company; (6) whether the community has its own commercial establishments, health care facilities and transportation systems; (7) the extent to which the proposed community and the central city are part of the same advertising market; and (8) the extent to which the proposed community relies on the larger metropolitan area for various municipal services. 20/

As to WPKX, from the proposed reference coordinates, the 70 dBu signal of WPKX would cover 47.9 percent of the Springfield Urbanized Area. 21/ Thus, less than a majority of any Urbanized Area is covered. 22/ Although the substantial population of Windsor Locks is smaller than that of Springfield, Massachusetts, 23/ the Commission has granted requests when the new community is separate and independent and not a “bedroom” community

19/ See, e.g., *Saluda and Irmo, South Carolina*, 19 FCC Rcd at 1078-79 [¶ 3] (discussing *Faye & Richard Tuck*, 3 FCC Rcd 5374 (1988) (“*Tuck*”).

20/ *Tuck*, 3 FCC Rcd at 5378 [¶ 36].

21/ See WPKX Technical Exhibit.

22/ Even a greater coverage of the Urbanized Area would not necessarily preclude favorable consideration as a first local service. See, e.g., *Bon Air, Chester, Mechanicsville, Ruckersville, Williamsburg and Fort Lee, Virginia*, 11 FCC Rcd 5758, 5760 [¶ 11] (MMB 1996) (“*Bon Air*”) (finding community independent when station would place a city grade signal over 100% of the Urbanized Area).

23/ The Windsor Locks population (2000 U.S. Census population 12,043), see *supra* note 15, is approximately 7.9 percent of the population of Springfield (2000 U.S. Census population 152,082). See U.S. Census Bureau, <http://quickfacts.census.gov/qfd/states/25/2567000.html> (copy at Attachment 9).

of the nearby metropolitan area. 24/ Windsor Locks is over 13 miles from Springfield, Massachusetts. 25/ This distance amply demonstrates the independence of the Windsor Locks community from Springfield. 26/ Furthermore, the Commission has granted first local preference under *Tuck* to communities with similar or smaller population proportions than that of Windsor Locks to Springfield. 27/ The following factors further demonstrate the independence of Windsor Locks from Springfield.

(1) Extent to which community residents work in the larger metropolitan area.

Various business ventures located within Windsor Locks (described below), including aerospace, construction, manufacturing, educational, health and social services, as well as retail trade, provide employment opportunities in the community. According to 2000 Census figures, 1,501 employed residents of Windsor Locks, or 24.4%, work within Windsor Locks. 28/ This

24/ *See, e.g., Ada, Newcastle, and Watonga, Oklahoma*, 11 FCC Rcd 16896, 16897 [¶ 3] (MMB 1996).

25/ Attached as Attachment 10 is a map with the distance calculated by Internet map provider Google Maps.

26/ *See, e.g., Mullins and Briarcliffe Acres, South Carolina*, 14 FCC Rcd 10516, 10517 [¶ 3] (MMB 1999) (finding community independent with a four-mile separation from Urbanized Area); *Bon Air*, 11 FCC Rcd 5758, 5760 [¶ 11] (finding community independent with a three-mile separation from central city of Urbanized Area).

27/ *See e.g., Vinton, Louisiana, Crystal Beach, Lumberton and Winnie, Texas*, 24 FCC Rcd 5873, 5875 [¶ 6] (2009) (affirming independence of community when population is eight percent of that of central city of Urbanized Area); *Arlington, The Dalles, Moro, Fossil, Astoria, Gladstone, Portland, Tillamook, Coos Bay, Springfield-Eugene, Manzanita and Hermiston, Oregon, and Covington, Trout Lake, Shoreline, Bellingham, Forks, Hoquiam, Aberdeen, Walla Walla, Kent, College Place, Long Beach and Ilwaco, Washington*, 21 FCC Rcd 13226, 13229 [¶ 8] (2006) (proposed community with less than 2.5 percent of the population of central city deemed a substantial population that supports consideration as a first local service).

28/ *See U.S. Census Bureau, Place of Work for Workers 16 Year and Over, Census 2000 Summary File, Windsor Locks CDP, Connecticut* (copy at Attachment 11).

percentage exceeds those of other communities deemed independent under a *Tuck* analysis. 29/

The Windsor Locks Chamber of Commerce, founded in 1954, is organized “to advance the general welfare and prosperity of the Windsor Locks Area so that its citizens and all areas of its business community shall prosper. All necessary means of promotion shall be provided and particular attention and emphasis shall be given to the economic, civic, commercial, cultural, industrial and educational interests of the area.” 30/ In addition to support from the Windsor Locks Chamber of Commerce, the community continues to prosper as a place of employment from the long-term presence of Bradley International Airport, the “Gateway to New England,” which recently inaugurated non-stop international flights to Amsterdam. 31/

(2) Whether the community has its own newspaper or other media coverage.

Community residents can access local developments and utilize an on-line local business directory via the Windsor Locks Chamber of Commerce website. 32/ In addition, two locally-generated newsletters have been sources of local news for the residents of Windsor Locks: the *Windsor Locks Main Street News* 33/ and the *Bradley Gateway* 34/. Also, as noted below, an independent newsletter, which accepts advertisements, serves the community accessing Bradley

29/ See e.g., *Charles Town, West Virginia and Stephens City, Virginia*, 21 FCC Rcd 1521 [¶ 5] (MB 2006) (11 percent of employed residents working in proposed community, along with the presence of local businesses, supports a favorable *Tuck* finding); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610, 3610 [¶ 4] (MMB 1996) (13 percent of the workforce working in specified community sufficient to support a favorable *Tuck* finding).

30/ See Windsor Locks Chamber of Commerce Web site, at <http://www.windsorlockschamber.org/> (excerpts at Attachment 12).

31/ See *id.*

32/ See *supra* note 30.

33/ See <http://archive.constantcontact.com/fs022/1101984693438/archive/1102857260987.html> (copy at Attachment 13).

34/ See <http://www.windsorlocksct.org/site/files/eidc.12-09.bradley.gatewa.doc> (copy at Attachment 14).

International Airport, located in Windsor Locks, 35/ and the local senior center's newsletter, *The Scan*, also publishes local advertisements. 36/

(3) Whether community leaders and residents perceive the proposed community as being an integral part of, or separate from, the larger metropolitan area. Windsor Locks has long reflected its independent sense of community, beginning with its incorporation in 1854. 37/ The resources of the Windsor Locks Town Clerk links citizens with the long history of the Town's business and events; as noted by the Town Clerk, the Town's "archives are a priceless resource, essential to nearly every area of government, businesses, historians, and the general public. The documents on file in this office tell the story of Windsor Locks since its incorporation in 1854. They include the records of births, marriages, deaths of our citizens. Here too are the records of all the land transfers, Town Meetings and elections." 38/

The distinct identity of Windsor Locks is preserved and explored through the Windsor Locks Historical Commission, which meets regularly at the Windsor Locks Town Hall. 39/ The town's Community Advisory Council sponsors events in Windsor Locks, such as the Annual Octoberfest and Annual Torch Light Parade and Tree Lighting Ceremony. 40/ Windsor Locks citizens participate in "Project Christmas Elf," in which donated toys and gift cards are supplied to needy families residing in Windsor Locks. 41/

Windsor Locks residents devote their efforts to many community organizations,

35/ See *infra* note 60.

36/ See *infra* note 74.

37/ See *supra* note 16.

38/ See *id.*

39/ See <http://www.windsorlocksct.org/page.php?pid=371> (copy at Attachment 15).

40/ See <http://www.windsorlocksct.org/page.php?pid=242> (copy at Attachment 16).

including, but not limited to, Rotary 42/ and Lions 43/ Clubs, the American Legion, 44/ and the Knights of Columbus 45/. The residents cheer each other on in sports — Windsor Locks is home to soccer 46/ and softball 47/ teams. There is a hiking trail in Windsor Locks. 48/ There are also two museums, The New England Air Museum 49/ and the Noden-Reed Farm Museum 50/. The Windsor Locks Preservation Association was formed to encourage and educate the public and town government on the importance of preservation, with the prime focus to obtain and preserve the historic Windsor Locks Passenger Train Station. 51/ A Windsor Locks photographer, Jerry Dougherty, has documented Town pride with his photographs of Windsor Locks events. 52/ And, as noted above, the Windsor Locks business community expresses its sense of cohesion by support of and participation in the Windsor Locks Chamber of Commerce. 53/

(4) Whether the proposed community has its own local government and elected officials. Windsor Locks is governed by an elected Board of Selectmen. 54/ Other elected Town officials are the Town Clerk, Town Treasurer, Tax Collector, and Constable; members of the Boards of Finance, Education, Assessors, Assessment Appeals, and Zoning Appeals; and

41/ See <http://www.windsorlocksct.org/page.php?pid=259> (copy at Attachment 17).

42/ See Attachment 18.

43/ See Attachment 19.

44/ See Attachment 20.

45/ See Attachment 21.

46/ See Attachment 22.

47/ See Attachment 23.

48/ See <http://www.ct.gov/dot/LIB/dot/Documents/dbikes/128.pdf> (copy at Attachment 24).

49/ See Attachment 25.

50/ See Attachment 26.

51/ See Attachment 27.

52/ See Attachment 28.

53/ See *supra* note 30.

members of the Police, Fire, Park, and Sewer Commissions 55/

(5) Whether the community has its zip code and its own telephone book provided by a local telephone company. Windsor Locks has its own zip code: 06096. 56/ There are two post offices within Windsor Locks. 57/ While Windsor Locks does not have its own telephone book, this is a factor that has not been determinative of independent status. 58/

(6) Whether the community has its own commercial establishments, health care facilities and transportation systems. Hamilton Sundstrand , among the world’s largest suppliers of technologically advanced aerospace and industrial products, is headquartered in Windsor Locks. 59/ Windsor Locks is also home to Bradley International Airport, which is served by a locally-produced newsletter, *The Airport News*. 60/ There is a large variety of commercial establishments, including hotels, restaurants, retail outlets, and professional services (including legal, accounting, banking, insurance, and real estate) within the Windsor Locks community. 61/ Many of these establishments include “Windsor Locks” in their names. 62/ Health care facilities and services include a skilled nursing facility, the Windsor Locks Medical Center, the Windsor Locks Lions Ambulance Corp., and independent medical and dental providers. 63/ There are

54/ See Attachment 29.

55/ See <http://www.windsorlocksct.org/site/files/minutesofelectorsmeeting.doc> (copy at Attachment 30).

56/ See Attachment 31.

57/ See United States Postal Service Web site, at http://usps.whitepages.com/post_office/search?d=5&z=06096 (copy at Attachment 32).

58/ See, e.g., *Bon Air*, 11 FCC Rcd at 5760 [¶ 11] (community that qualifies for local transmission service does not have its own telephone book provided by the local telephone company).

59/ See Windsor Locks Chamber of Commerce Business Directory (copy at Attachment 33).

60/ See *supra* note 30 and <http://www.theairportnews.com/> (recent edition at Attachment 34).

61/ See *supra* note 59.

62/ See Attachment 35.

63/ See *supra* note 59; see also Attachment 36.

seven churches in the Windsor Locks community, a factor which the Commission has considered favorably under *Tuck*. 64/

(7) Extent to which the proposed community and the central city are part of the same advertising market. Windsor Locks, being located in Hartford County, is part of the Hartford-New Britain-Middletown, Connecticut Arbitron Metro market, 65/ which is a separate market from the Springfield Arbitron Metro. Moreover, as noted above and below, commercial enterprises may reach Windsor Locks residents through the local newsletters, *The Airport News*, *Windsor Locks Main Street News*, the *Bradley Gateway*, and *The Scan*.

(8) Extent to which the proposed community relies on the larger metropolitan area for various municipal services. Windsor Locks provides many municipal services directly to its residents. For instance, Windsor Locks has its own school, 66/ library, 67/ fire, 68/ police, 69/ park and recreation, 70/ public works, 71/ and social services 72/ departments. The Town operates a Senior Center, 73/ which publishes a newsletter, *The Scan*, which accepts local advertisements. 74/ Because Windsor Locks provides services of its own and is not dependent on Springfield, Massachusetts, for municipal services, credit should be awarded under this *Tuck*

64/ See Attachment 37; see, e.g., *Talladega and Munford, Alabama*, 20 FCC Rcd 13010, 13012 [¶ 6] (MB 2005) *Talladega and Munford, Alabama*, 20 FCC Rcd 13010, 13011 [¶ 3] (MB 2005) (“*Talladega and Munford*”).

65/ See BIA Media Access Pro.

66/ See Attachment 38.

67/ See Attachment 39.

68/ See Attachment 40.

69/ See Attachment 41.

70/ See <http://www.windsorlocksct.org/site/files/prflyerfall.pdf> (copy at Attachment 42).

71/ See Attachment 43.

72/ See Attachment 44.

73/ See Attachment 45.

74/ See <http://content.seekandfind.com/bulletins/06/5045/20101203N.pdf> (copy at Attachment 46).

factor. 75/

Under Commission precedent, these indicia of community confirm that Enfield and Windsor Locks are places deserving of their own local aural transmission service and that grant of the Applications would further the public interest in the fair, efficient, and equitable distribution of radio services.

75/ See *Talladega and Munford*, 20 FCC Rcd at 13012 [¶ 5].