

COMMENTS AND COUNTERPROPOSAL
MB DOCKET # 10-118
CUMULUS LICENSING LLC
KNRQ-FM RADIO STATION
ALOHA, OREGON
August 2010

TECHNICAL STATEMENT

These comments and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of KNRQ-FM, Channel 250C, Eugene, Oregon and permittee of KNRQ-FM, Channel 250C2, Tualatin, Oregon. In MB Docket #10-118, Black Hills Broadcasting, L.P. ("Black Hills") seeks the allotment of Channel 243A to Gearhart, Oregon as that community's first local station. Cumulus herein submits a counterproposal which seeks to upgrade KNRQ-FM to Channel 250C1 (from Channel 250C2 at Tualatin, Oregon) and change its community of license to Aloha, Oregon as that community's first local service. In order to accommodate the KNRQ-FM request, Cumulus also requests that Channel 243A be substituted for Channel 251A at Seaside, Oregon and that station KCYS be ordered to change channel (this portion of the counterproposal is mutually exclusive with the proposed allotment of Channel 243A at Gearhart, Oregon, as requested in the Notice). In addition, Channel *243C1 must be substituted for the vacant, yet applied for, Channel *251C1 at Madras, Oregon. With this counterproposal, Cumulus is simultaneously submitting an application, on FCC Form 301, seeking the upgrade of KNRQ-FM to Channel 250C1 at Aloha, Oregon.¹

Counterproposal

Cumulus requests the upgrade of Channel 250C2 at Tualatin, Oregon to Channel 250C1 and the re-allotment of the channel to Aloha, Oregon. As indicated on Exhibit #1, Channel

1) The requests contained in the Form 301 are incorporated herein by reference.

EXHIBIT #E

250C1 meets the Commission's minimum distance separation requirements from the proposed allocation site, North Latitude 45° 29' 20.0" and West Longitude 122° 41' 40.0. This represents a site restriction of 13.4 kilometers east of the community to avoid a shortage to station KOMO-FM, Channel 249C, Oakville, Washington and the vacant allotment of Channel 252C3 at Dallas, Oregon.² The spacing study notes a shortage to station KACI-FM, Channel 249C2, The Dalles, Oregon. KACI-FM holds a construction permit to move to Channel 228C2 at The Dalles, Oregon (BPH-20100205ACB). As such, the present licensed facility of KACI-FM is not considered further.³ The spacing study also indicates a shortage to station KCYS at Seaside, Oregon, which will move to Channel 243A as detailed below, as well as, a shortage to the vacant, but applied for Channel *251C1 at Madras, Oregon, which will change to Channel *243C1, also detailed below.

From the proposed allocation site at Aloha, Oregon, Channel 250C1 will provide a 70 dBu contour over 100% of the community of Aloha, Oregon, in compliance with §73.315(a) of the rules (Exhibit #2). Further, the proposed allocation site is not located off-shore or on airport property and is, therefore, suitable for tower construction.⁴ The allotment of Channel 250C1 will provide for a first local service for Aloha, Oregon, a Census Designated Place of 41, 741 persons. As KNRQ-FM is not operational in Tualatin, Oregon, no actual or potential service is being removed from this community.⁵

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- 2) Channel 250C1 at Aloha, Oregon is mutually exclusive with the present KNRQ-FM permit at Tualatin, Oregon and the present licensed site of KNRQ-FM at Eugene, Oregon.
 - 3) KACI-FM previously submitted a contingent application with KNRQ-FM, when KNRQ-FM was upgraded to Channel 250C2 at Tualatin, Oregon.
 - 4) An existing tower is located at the proposed allocation site. The tower has been registered with the Commission and assigned Antenna Structure Registration number 1033770.
 - 5) Tualatin, Oregon has a population of 22,791 persons according to the 2000 U.S. Census.

In order to accommodate the upgrade and community of license change for KNRQ-FM, Cumulus requests the substitution of Channel 243A for Channel 251A at Seaside, Oregon and also requests that the licensee of KCYS, Channel 251A, Seaside, Oregon be issued an Order to Show Cause as to why its license should not be modified to specify Channel 243A in lieu of Channel 251A. Cumulus will reimburse the licensee of KCYS for reasonable expenses incurred to implement the change of channels at Seaside. Channel 243A can be substituted for Channel 251A at Seaside, Oregon 4.6 kilometers south-southwest of the community at North Latitude 45° 57' 08.0" and West Longitude 123° 56' 14.0", which is the present KCYS transmitter site, as indicated on Exhibit #3.⁶ As the proposed reference site for Seaside, Oregon is the licensed KCYS site, coverage of the community of license will be maintained.⁷ As this is an existing tower site, further tower construction is not required.

In addition to the proposed change at Seaside, Oregon, Cumulus also requests the substitution of Channel *243C1 for the vacant, yet applied for, Channel *251C1 at Madras, Oregon. Channel *251C1 at Madras, Oregon was reserved for non-commercial operation, after initially being allotted as a non-reserved channel. The proposed use of Channel *243C1 as a replacement channel is being proposed at the present allocation site at Madras, Oregon. Therefore, it is presumed that the criteria for non-commercial reservation is not altered by this channel change. Therefore, no reservation study is included herein.

6) The availability of the channel assumes that Channel 243A is not allotted to Gearhart, Oregon as is requested by Black Hills.

7) A predicted 70 dBu contour is delivered over all of Seaside, Oregon by the licensed KCYS. Further, a theoretical 70 dBu, without consideration of terrain, is also provided over all of Seaside, Oregon.

Channel *43C1 can be allotted to Madras, Oregon at North Latitude 44° 50' 02.0" and West Longitude 120° 45' 55.0". This represents a site restriction of 36.4 kilometers northeast from the community of license to accommodate the use at the present Channel *251C1 allocation site. As this is a substitution of one Class C1 channel for another at the site location, a 70 dBu contour will be provided to Madras, Oregon. The availability of Channel *243C1 at Madras, Oregon is based on station KWLTV-FM, Channel 243C, Warm Springs, Oregon's change to Channel 242C3 and with a change of community of license to West Linn, Oregon (BPH-20070119AAT). Therefore, as KWLTV-FM is operating at its former licensed site under an implied STA, the licensed site no longer requires protection and is not considered an impediment to this instant request. Further, the database still shows the vacant allocation of Channel 244C2 at Maupin, Oregon, and its companion application (MB Docket #09-130). The petitioner for Maupin, Oregon submitted a request for the deletion of the channel after the initial Order was made. On June 28, 2010, the Commission deleted Channel 244C2 from Maupin, Oregon at the petitioner's request.⁸ Therefore, this channel is also not considered an impediment to the proposed channel change at Madras, Oregon.

As there are two pending non-commercial applicants for Channel *251C1, spacing studies were also conducted from each of these sites to verify that Channel *243C1 could be implemented at each location. At the site specified in the Educational Broadcast Service site (BNPED-20100226AIL), the application is proposing implementation at the Channel *251C1 allocation site. Therefore, as detailed above, Channel *243C1 can be utilized at this location.

8) The petitioner also requested the deletion of the pending application for Maupin, Oregon (BNPH-20081107AEN).

Tool Shed PDX (BNPED-20100226AJY), the other applicant for Madras, has proposed a site at North Latitude 44° 55' 40.0" and West Longitude 120° 43' 40.2". As indicated on Exhibit #5, Channel 243C1 can also be implemented at this location.⁹

As both the allocation site and pending application sites for Channel *251C1 are accommodated at Madras, Oregon, Cumulus requests that Channel *243C1 be substituted for Channel *251C1. As both applicants are mutually exclusive, Cumulus requests that following favorable action on its counterproposal, both applicants be required to submit amendments to their respective applications, or that the Commission ultimately issue a permit to the tentative selectee on Channel *243C1 rather than on Channel *251C1 at Madras, Oregon. As this is a substitution for a vacant allotment, no reimbursement issues apply.

Alternate Channel for Gearhart, Oregon

Cumulus does not wish to preclude a possible first local service for Gearhart, Oregon. To that end, Cumulus has identified an alternate channel for Gearhart, Oregon, which can be implemented at the proposed allocation/application site as requested by Black Hills. Channel 227A can be allotted to Gearhart, Oregon, at North Latitude 45° 57' 11.0" and West Longitude 123° 56' 14.0". This represents a site restriction of 8.2 kilometers south-southwest to accommodate the proposed Black Hills site. Black Hills has already demonstrated the required 70 dBu coverage to Gearhart, Oregon. As indicated on Exhibit #6, Channel 227A meets the spacing requirements to all licensed, applied for or proposed facilities, with the exception of the vacant allotment of Channel 228C3 at Manzanita, Oregon.

9) Not considering the licensed site of KWLZ-FM on Channel 243C or the former allotment of Channel 244C2 at Maupin, Oregon, as discussed previously.

Cumulus has identified an alternative channel for use in Manzanita, Oregon. Channel 248C3 can be allotted to Manzanita, Oregon at North Latitude 45° 41' 05.0" and West Longitude 123° 54' 38.0", which is the present allocation site for Channel 228C3. Since this is the present allocation site for the community, 70 dBu coverage of the community is not changed as a result of the channel substitution. As indicated on Exhibit #7, Channel 248C3 can be allotted to Manzanita, Oregon in compliance with the Commission's minimum distance separation requirements. It is noted that there is an apparent shortage to KCYS on Channel 251A at Seaside, Oregon, which is eliminated by the substitution of Channel 243A at Seaside, as noted above. There is also an apparent shortage to station KSHL, Channel 248C2, Gleneden Beach, Oregon. However, in BPH-20080331ACW, KSHL received a construction permit to change to Channel 249C3 and a change in community of license to Coburg, Oregon. Therefore, since KSHL is operating pursuant to an implied STA at Gleneden Beach, Oregon, the licensed site no longer requires protection and is not considered an impediment to this instant request.

Therefore, Cumulus requests the following changes to the Commission's Table of Assignments and Allocations:

Aloha, Oregon

Present	Proposed
None	250C1

Tualatin, Oregon

Present	Proposed
250C2	None

Seaside, Oregon

Present 251A, 272C3	Proposed 243A, 272C3
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Madras, Oregon

Present *251C1	Proposed *243C1
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Gearhart, Oregon

Present None	Proposed 227A
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Manzanita, Oregon

Present 228C3	Proposed 248C3
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The proposed changes requested herein will provide for the allotment of a first local service to Aloha, Oregon.¹⁰ From the proposed allocation site at Aloha, Oregon, Channel 251C1 will provide a 60 dBu service to 2,184,813 persons in 16,376.5 square kilometers.¹¹ This represents an increase of 250,319 persons in 7,816.2 square kilometers over the present Channel 250C2 facility at Tualatin, Oregon.¹² The adoption of the Cumulus counterproposal will also accommodate a first local service to Gearhart, Oregon, as initially requested by Black Hills.

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- 10) Cumulus does express interest in the Aloha, Oregon channel for use of KNRQ-FM, and has submitted an application for a modified permit for KNRQ-FM.
 - 11) Based on uniform terrain. 2000 U.S. Census figures.
 - 12) Based on uniform terrain, 2000 U.S. Census data and maximum Class C2 facilities in Tualatin, Oregon. A maximum Class C2 facility at Tualatin, Oregon, at the present KNRQ-FM site, provides a 60 dBu contour to 1,934,494 persons in 8,560.3 square kilometers.

The foregoing was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge.¹⁴

14) All data regarding FM facilities was extracted from the Commissions CDBS database on the date indicated on the respective spacing studies. We assume no liability for errors or omissions in the database which may be adverse to the request contained herein. Submission of these comments by the petitioner/applicant is acceptance of these terms.

COMMENTS AND COUNTERPROPOSAL

MB DOCKET # 10-118

CUMULUS LICENSING LLC

KNRQ-FM RADIO STATION

ALOHA, OREGON

August 2010

EXHIBIT #1

Allocation Study for KNRQ-FM Aloha, Oregon
Using Allocation Site as Reference

REFERENCE 45 29 20.0 N. CLASS = C1 Int = C1 DISPLAY DATES
122 41 40.0 W. Current Spacings to 3rd Adj. DATA 08-04-10
----- Channel 250 - 97.9 MHz ----- SEARCH 08-04-10

Call	Channel	Location	Ant	Azi	Dist	FCC	Margin
	Lat.	Lng.		Power	HAAT		
AD251	ADD 250C1	Aloha	OR	0.0	0.0	245.0	-245.0
	45 29 20.0	122 41 40.0		100.000 kW	0 M		
	Allocation site for Aloha, Oregon						
KNRQ-FM	CP -N 250C2	Tualatin	OR	313.0	5.5	224.0	-218.5
	45 31 21.0	122 44 45.0	NCX	3.700 kW	470 M		
	Cumulus Licensing LLC BMPH-20080331ACU						
KNRQ-FM	LIC 250C	Eugene	OR	191.5	168.5	270.0	-101.5
	44 00 08.0	123 06 50.0	EN	100.000 kW	308 M		
	Cumulus Licensing LLC BLH-19910528KF						
KACI-FM	LIC 249C2	The Dalles	OR	80.3	112.3	158.0	-45.7
	45 38 58.0	121 16 25.0	CX	50.000 kW	271 M		
	Bicoastal Media Licenses Inc. BLH-20071009ABD > to Channel 228C2 per one step application BPH-20100205ACB.						
KCYS	LIC 251A	Seaside	OR	298.5	109.6	133.0	-23.4
	45 57 08.0	123 56 14.0	C	6.000 kW	100 M		
	Dave's Broadcasting Corp. BLH-20000225AAK > to Channel 243A - Order to Show Cause requested.						
1358321	APP-D 251C1	Madras	OR	111.3	166.6	177.0	-10.4
	44 55 40.0	120 43 40.2	DCX	100.000 kW	149 M		
	Tool Shed PDX BNPED-20100226AJY > to Channel 243C1 - alternate channel.						
1358487	APP 251C1	Madras	OR	115.0	168.2	177.0	-8.8
	44 50 02.0	120 45 55.0	CX	100.000 kW	300 M		
	Educational Broadcast Serv. BNPED-20100226AIL > to Channel 243C1 - alternate channel.						
AL6416	VAC 251C1	Madras	OR	115.0	168.2	177.0	-8.8
	44 50 02.0	120 45 55.0		100.000 kW	299 M		
	Madras Broadcasting RM9961 > to Channel 243C1 - alternate channel.						
KOMO-FM	LIC-Z 249C	Oakville	WA	345.9	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	ZCX	63.000 kW	728 M		
	South Sound Broadcasting BLH-20080514AGI						
KOMO-FM	APP-D 249C	Oakville	WA	345.9	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	DCX	69.000 kW	701 M		
	South Sound Broadcasting BMPH-20100602AKM						

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EXHIBIT #1 (continued)

Call	Channel	Location	Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	Power	HAAT		
KOMO-FM	CP -Z 249C	Oakville	WA	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	ZCX	345.9	728 M	
		South Sound Broadcasting		63.000 kW		
				BPH-20090626AAO		
1356434	APP 252C3	Dallas	OR	78.0	76.0	2.0
	44 51 18.0	123 07 15.0	CX	205.5	282 M	
		Capital Community Television		3.200 kW		
				BNPED-20100226AEJ		
1353945	APP 252C3	Dallas	OR	78.0	76.0	2.0
	44 51 18.0	123 07 15.0	CX	205.5	297 M	
		Mano A Mano Family Center		2.780 kW		
				BNPED-20100225ADD		
VA2391	VAC 252C3	Dallas	OR	80.1	76.0	4.1
	44 55 06.0	123 19 00.0	N	217.8	100 M	
				25.000 kW		
KPPK	LIC 252A	Rainier	OR	79.8	75.0	4.8
	46 10 59.0	122 57 29.0	CX	345.3	195 M	
		Bicoastal Media Licenses Inc.		1.600 kW		
				BLH-20060802AFY		
1357368	APP 252C3	Dallas	OR	82.0	76.0	6.0
	44 54 42.8	123 20 44.2	CX	218.7	100 M	
		Dallas Seventh-day Advent.		25.000 kW		
				BNPED-20100223AAB		
1357190	APP 252C3	Dallas	OR	84.4	76.0	8.4
	44 53 18.0	123 21 05.0	CX	217.9	59 M	
		Centro Cristiano Vida Abund.		25.000 kW		
				BNPED-20100226ADS		
1357070	APP 252C3	Dallas	OR	84.4	76.0	8.4
	44 53 18.0	123 21 05.0	CX	217.9	67 M	
		Calvary Chapel Of McMinnville		25.000 kW		
				BNPED-20100222ACK		
1357754	APP 252C3	Dallas	OR	84.5	76.0	8.5
	44 53 17.4	123 21 09.3	CX	217.9	61 M	
		Hispanic Family Christian		25.000 kW		
				BNPED-20100226AHE		
1358445	APP 252C3	Dallas	OR	92.0	76.0	16.0
	44 55 52.4	123 33 33.0	CX	227.8	559 M	
		Grace Public Radio		0.650 kW		
				BNPED-20100224ACK		
KING-FM	LIC-D 251C	Seattle	WA	230.7	209.0	21.7
	47 30 14.0	121 58 29.0	DC	13.6	707 M	
		Classic Radio, Inc.		68.000 kW		
				BLH-20080707AIW		

Graham Brock, Inc. - Broadcast Technical Consultants

Allocation Site

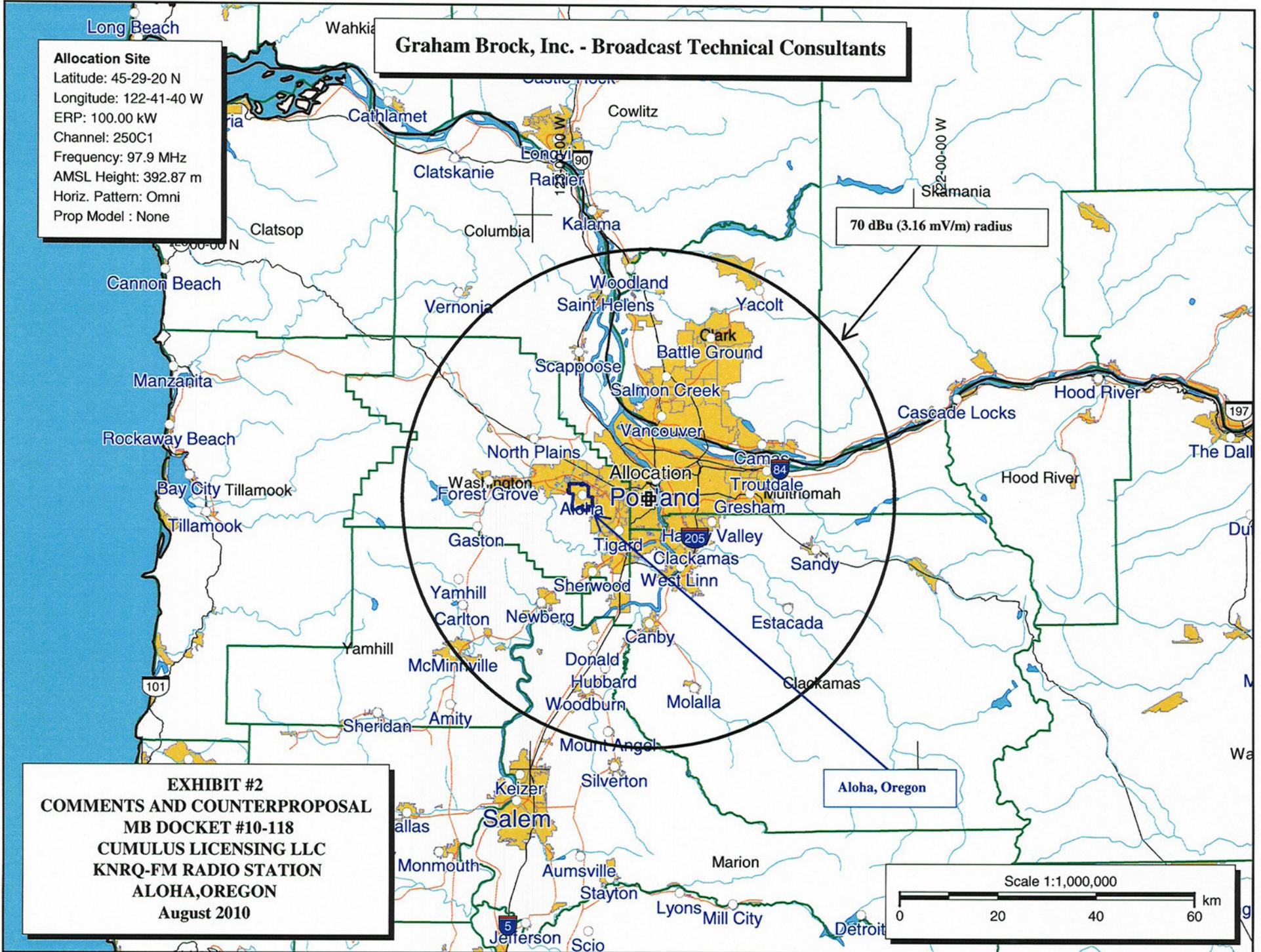
Latitude: 45-29-20 N
Longitude: 122-41-40 W
ERP: 100.00 kW
Channel: 250C1
Frequency: 97.9 MHz
AMSL Height: 392.87 m
Horiz. Pattern: Omni
Prop Model : None

70 dBu (3.16 mV/m) radius

Aloha, Oregon

EXHIBIT #2
COMMENTS AND COUNTERPROPOSAL
MB DOCKET #10-118
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KNRQ-FM RADIO STATION
ALOHA, OREGON
August 2010

Scale 1:1,000,000



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EXHIBIT #3

Allocation Study for Seaside, Oregon
Using KCYS Site as Reference

REFERENCE	CLASS = A Int = A	DISPLAY DATES
45 57 08.0 N.	Current Spacings to 3rd Adj.	DATA 08-04-10
123 56 14.0 W.	Channel 243 - 96.5 MHz	SEARCH 08-04-10

Call	Channel	Location	Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	Power	HAAT		
AD243	ADD 243A	Seaside	OR 0.0	0.0	115.0	-115.0
	45 57 08.0	123 56 14.0	6.000 kW	0 M		
Counterproposal in MB Docket 10-118 - Alternate channel for KCYS						
1369057	RSV 243A	Gearhart	OR 0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0	6.000 kW	100 M		
<i>Black Hills Broadcasting</i>						
<i>> move to Channel 227A - pursuant to counterproposal.</i>						
R13706	ADD 243A	Gearhart	OR 0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0	6.000 kW	100 M		
<i>Black Hills Broadcasting</i>						
<i>> move to Channel 227A - pursuant to counterproposal.</i>						
1368395	APP 243A	Gearhart	OR 0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0	CX 6.000 kW	70 M		
<i>Black Hills Broadcasting</i>						
<i>BNPH-20100513AAZ</i>						
<i>> move to Channel 227A - pursuant to counterproposal.</i>						
KCRF-FM	LIC 244C1	Lincoln City	OR 183.8	133.2	133.0	0.22
	44 45 22.0	124 02 57.0	C 19.500 kW	266 M		
<i>Pacific West Broadcasting</i>						
<i>BLH-20010827AAA</i>						
KJAQ	LIC-N 243C	Seattle	WA 40.3	229.0	226.0	3.0
	47 30 17.0	121 58 03.0	NC 52.000 kW	696 M		
<i>CBS Radio Holdings Inc.</i>						
<i>BLH-20060710ABP</i>						
KYCH-FM	LIC 246C	Portland	OR 117.7	109.6	95.0	14.6
	45 29 20.0	122 41 40.0	CY 100.000 kW	386 M		
<i>Entercom Portland License</i>						
<i>BLH-19900821KA</i>						
KWLZ-FM	LIC 243C	Warm Springs	OR 119.4	245.2	226.0	19.2
	44 50 24.0	121 13 56.0	CN 100.000 kW	332 M		
<i>Horizon Broadcasting Group</i>						
<i>BLH-19860127KG</i>						
KWLZ-FM	CP -Z 242C3	West Linn	OR 117.7	109.6	89.0	20.6
	45 29 20.0	122 41 40.0	ZCX 2.900 kW	297 M		
<i>Horizon Broadcasting Group</i>						
<i>BPH-20070119AAT</i>						

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KNRQ-FM RADIO STATION
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EXHIBIT #5

Clearance Study for Madras, Oregon
Using Proposed Tool Shed Site as Reference

REFERENCE	CLASS = C1	DISPLAY DATES
44 55 40.0 N.	Current Spacings to 3rd Adj.	DATA 08-04-10
120 43 40.2 W.	Channel 243 - 96.5 MHz	SEARCH 08-04-10

Call	Channel	Location	Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	Power	HAAT		
AD243	ADD 243C1	Madras	OR 0.0	0.0	245.0	-245.0
	44 55 40.0	120 43 40.2	0.000 kW	0 M		
Alternate channel Tool Shed PDX site						
AD243	ADD 243C1	Madras	OR 195.8	10.8	245.0	-234.2
	44 50 02.0	120 45 55.0	0.000 kW	0 M		
Alternate channel - Allocation/Educational Broadcast System site						
KWLZ-FM	LIC 243C	Warm Springs	OR 256.4	41.0	270.0	-229.0
	44 50 24.0	121 13 56.0	CN 100.000 kW	332 M		
Horizon Broadcasting Group BLH-19860127KG						
> to Channel 242C3 West Linn, OR - One-step application BPH-20070119AAT						
1279916	RSV 244C2	Maupin	OR 313.5	39.8	158.0	-118.2
	45 10 24.0	121 05 43.0	50.000 kW	150 M		
Maupin Broadcasting Company						
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/10						
AL8304	VAC 244C2	Maupin	OR 313.5	39.8	158.0	-118.2
	45 10 24.0	121 05 43.0	50.000 kW	150 M		
Maupin Broadcasting Company RM-11538						
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/10						
1277255	APP 244C2	Maupin	OR 313.5	39.8	158.0	-118.2
	45 10 24.0	121 05 43.0	CX 50.000 kW	-62 M		
Maupin Broadcasting Company BNPB-20081107AEN						
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/10						
AL8587	VAC 240A	Goldendale	WA 359.9	93.6	75.0	18.6
	45 46 12.0	120 43 48.0	6.000 kW	100 M		
Klickitat Broadcasting RM-11142						
KWLZ-FM	CP -Z 242C3	West Linn	OR 292.7	166.6	144.0	22.6
	45 29 20.0	122 41 40.0	ZCX 2.900 kW	297 M		
Horizon Broadcasting Group BPH-20070119AAT						
KJAO	LIC-N 243C	Seattle	WA 342.0	302.0	270.0	32.0
	47 30 17.0	121 58 03.0	NC 52.000 kW	696 M		
CBS Radio Holdings Inc. BLH-20060710ABP						

