

NEW FM APPLICATION
THRESHOLD COMMUNICATIONS
NEW FM STATION
CH 225C3 - 92.9 MHZ - 2.65 KW
FORDS PRAIRIE, WASHINGTON
June 2011

EXHIBIT C

City of License Change Review

This application seeks to re-allot Channel 225C3 from Clatskanie, Oregon to Fords Prairie, Washington. As shown in Exhibit A, the proposed use of Channel 225C3 at Fords Prairie, Washington is mutually exclusive with the Channel 225C3 allotment at Clatskanie, Oregon. The proposed city of license change complies with 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.

As indicated in Exhibit A, Channel 225C3, at the proposed allocation/implementation site at Fords Prairie, Washington, meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207. As the proposed community of Fords Prairie, Washington is larger than the community of Clatskanie, Oregon, and Channel 225C3 is an unbuilt and vacant allotment, loss of service considerations do not apply. Exhibit C1 demonstrates there are no areas within the Channel 225C3 60 dBu contour where a first or second full-time service is provided.¹ Therefore, there are no white or gray areas.

1) Exhibit C1A is a list of full time FM stations providing service to the 60 dBu radius of the Clatskanie, Oregon allotment.

Therefore, TC proposes the following:

Fords Prairie, Washington

Present	Proposed
None	225C3

Clatskanie, Oregon

Present	Proposed
225C3	None

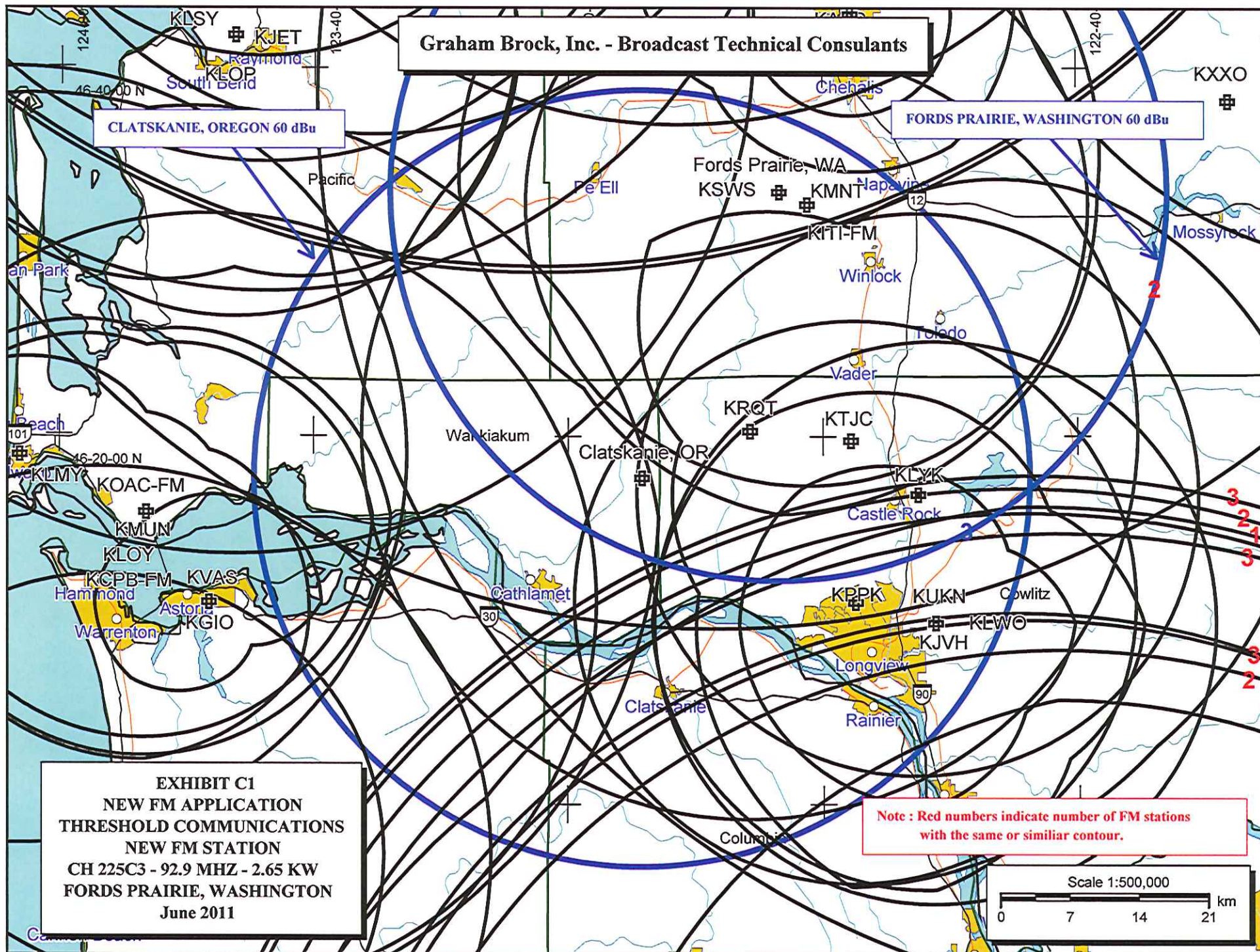
The allotment/implementation site for Channel 225C3 at Fords Prairie, Washington will provide a 60 dBu contour to 104,767 persons in 4,802.9 square kilometers.² As Channel 225C3 is an unbuilt, vacant allotment, there are no gain or loss area issues to be reviewed. A map depicting the proposed service contours of the new FM at Fords Prairie, Washington from the proposed implementation site is attached as Exhibit C2.³ The proposed new FM facility will provide a 60 dBu service to 106,384 persons in 4,573.0 square kilometers and a 70 dBu service to 58,406 persons in 1,590.0 square kilometers (assuming actual terrain conditions).

Attached as Exhibit C3 is a map showing the licensed stations which provide protected service to the community of Fords Prairie, Washington.⁴ A tabulation of the stations providing protected service to Fords Prairie is attached as Exhibit C4.

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- 2) A 70 dBu contour will provide service to 57,776 persons in 1,690.9 square kilometers (assuming uniform terrain). All population data is 2010 U.S. Census.
 - 3) To determine services, commercial and non-commercial FM stations in the area were reviewed. Full-time Class A stations were considered based on their 0.5 mV/m nighttime ground wave contour. 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 as the 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.
 - 4) As the population of Fords Prairie is less than 2,500 persons, the 0.5 mV/m contour for AM stations was depicted.

It is noted that the community of Fords Prairie, Washington is not located within any Urbanized Area, as defined by either the 2000 or 2010 U.S. Census. Further, the 70 dBu contour of the proposed new FM facility does not cross into any Urbanized Area, as indicated on Exhibit C5. The closest Urbanized Areas are Olympia-Lacey, Washington, which is located 55.6 kilometers northeast of the proposed Fords Prairie, Washington site and Longview, Washington, which is located 47.1 kilometers southeast of the Fords Prairie site. The Fords Prairie facility can not be located any closer to the Olympia-Lacey, Washington Urbanized Area due to a co-channel Class C limitation to the north. It might be possible for the channel to be moved to the southeast towards Longview, Oregon, however, it is noted that the present allotment at Clatskanie, Oregon places a 70 dBu into a portion of the Longview, Washington. Further, attempting to relocate the Fords Prairie facility south would remove the 70 dBu contour from the community of license and it would no longer be compliant with §73.313 of the rules. Therefore, it is believed that the facility could not be relocated to provide service to any Urbanized Area.

Based on the foregoing, the proposed change of community of license complies with the Commission's technical rules and regulations.



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EXHIBIT C1A

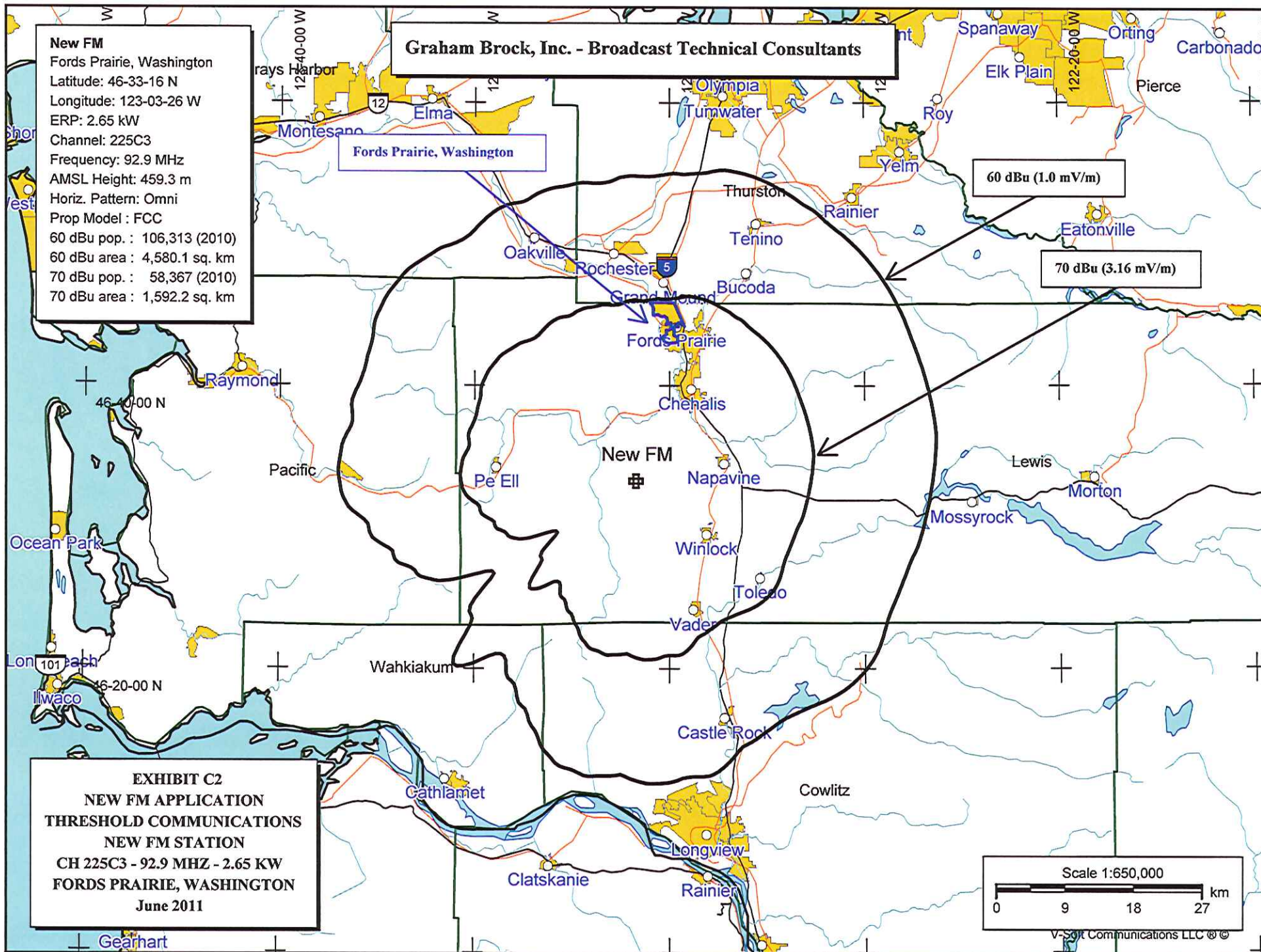
Stations Providing Protected Service to Clatskanie, Oregon

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KACS	213A	Chehalis, Washington
KANY	229C3	Ocean Shores, Washington
KAOS	207A	Olympia, Washington
KBFF	238C	Portland, Oregon
KBOO	214C1	Portland, Oregon
KCED	217A	Centralia, Washington
KCFL	217A	Elma, Washington
KCPB-FM	215A	Warrenton, Oregon
KCRX-FM	272C3	Seaside, Oregon
KCYS	251A	Seaside, Oregon
KDDS-FM	257C	Elma, Washington
KDUX-FM	284C2	Aberdeen, Washington
KFBW	290C1	Vancouver, Washington
KGIO	213A	Astoria, Oregon
KGON	222C	Portland, Oregon
KGY-FM	245C2	McCleary, Washington
KINK	270C	Portland, Oregon
KITI-FM	236A	Winlock, Washington
KJET	289C2	Raymond, Washington
KJVH	208A	Longview, Washington
KKCW	277C	Beaverton, Oregon
KKRZ	262C	Portland, Oregon
KLMY	259C3	Long Beach, Washington
KLOP	201A	Ocean Park, Washington
KLOY	204A	Astoria, Oregon
KLSY	300A	South Bend, Washington
KLTH	294C	Lake Oswego, Oregon
KLWO	212A	Longview, Washington
KLYK	233A	Kelso, Washington
KMNT	282C3	Chehalis, Washington

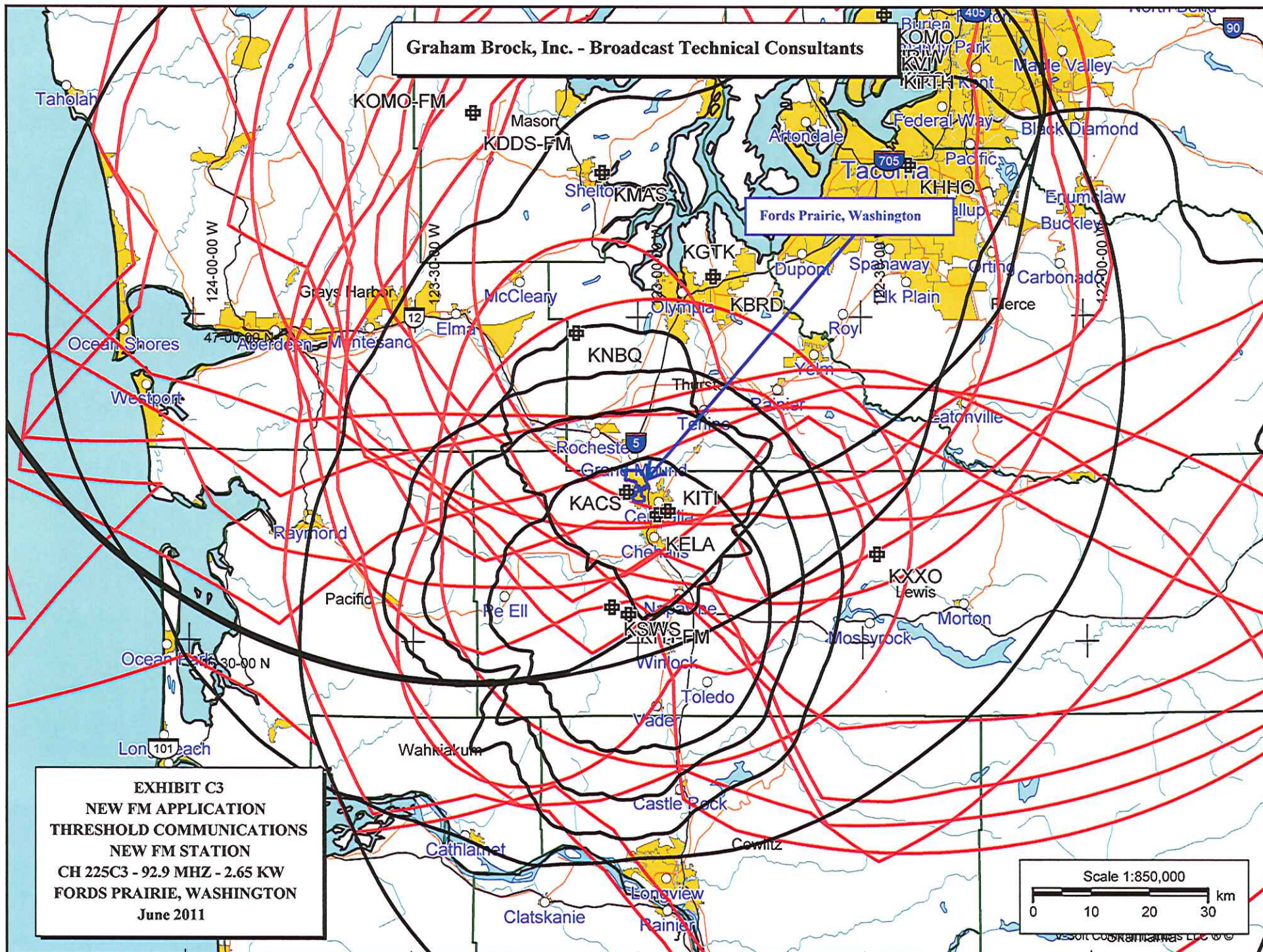
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EXHIBIT C1A (continued)

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KMUN	220C2	Astoria, Oregon
KNBQ	275C	Centralia, Washington
KOAC-FM	209A	Astoria, Oregon
KOMO-FM	249C	Oakville, Washington
KOPB-FM	218C0	Portland, Oregon
KPDQ-FM	230C1	Portland, Oregon
KPPK	252A	Rainier, Oregon
KQCB-FM	235C3	Cannon Beach, Oregon
KRQT	296C3	Castle Rick, Washington
KRRC	250D	Portland, Oregon
KRSK	286C1	Molalla, Oregon
KRXY	233A	Shelton, Washington
KSGX	285C3	Eatonville, Washington
KSWs	205C3	Chehalis, Washington
KSWW	271C3	Elma, Washington
KTJC	216C2	Kelso, Washington
KUKN	288A	Longview, Washington
KUPL	254C1	Portland, Oregon
KVAS	280C3	Ilwaco, Washington
KVTI	215C1	Tacoma, Washington
KWJJ-FM	258C1	Portland, Oregon
KXJM	298C0	Banks, Oregon
KXL-FM	266C	Portland, Oregon
KXOT	219C2	Tacoma, Washington
KXXK	237A	Hoquiam, Washington
KXXO	241C	Olympia, Washington
KYCK-FM	246C	Portland, Oregon



Graham Brock, Inc. - Broadcast Technical Consultants



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EXHIBIT C4

Stations Providing Protected Service to Fords Prairie, Washington

FM Stations

<u>Call</u>	<u>Ch/Class</u>	<u>City/State</u>
KACS	213A	Chehalis, Washington
KDDS-FM	257C	Elma, Washington
KITI-FM	236A	Winlock, Washington
KMNT	282C3	Chehalis, Washington
KNBQ	275C	Centralia, Washington
KOMO-FM	249C	Oakville, Washington
KSWS	205C3	Chehalis, Washington
KXXO	241C	Olympia, Washington

AM Stations

<u>Call</u>	<u>Freq</u>	<u>City/State</u>
KBRD	680 kHz	Lacey, Washington
KELA	1470 kHz	Centralia-Chehalis, Washington
KGNW	820 kHz	Burien-Seattle, Washington
KGTK	920 kHz	Olympia, Washington
KHHO	850 kHz	Tacoma, Washington
KIRO	710 kHz	Seattle, Washington
KITI	1420 kHz	Centralia-Chehalis, Washington
KIXI	880 kHz	Mercer Island/Seattle, Washington
KJR	950 kHz	Seattle, Washington
KMAS	1030 kHz	Shelton, Washington
KOMO	1000 kHz	Seattle, Washington
KPAM	860 kHz	Troutdale, Oregon
KPOJ	620 kHz	Portland, Oregon
KPTK	1090 kHz	Seattle, Washington
KTTH	770 kHz	Seattle, Washington
KVI	570 kHz	Seattle, Washington
KXTG	750 kHz	Portland, Oregon

Allocation reference:
Fords Prairie, Washington
Latitude: 46-33-16 N
Longitude: 123-03-26 W
ERP: 25.00 kW
Channel: 225C3
Frequency: 92.9 MHz
AMSL Height: 254.727 m
Horiz. Pattern: Omni
Prop Model : None

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Allocation reference :
Clatskanie, Oregon
Latitude: 46-17-44 N
Longitude: 123-14-13 W
ERP: 25.00 kW
Channel: 225C3
Frequency: 92.9 MHz
AMSL Height: 396.63 m
Horiz. Pattern: Omni
Prop Model: None

