

**January 2012
KRPI 1550 kHz
Point Roberts, WA
Section 307(b) Analysis**

By the instant minor change application, it is proposed to modify the authorization for KRPI from 1550 kHz at Ferndale, Washington to 1550 kHz at Point Roberts, Washington. Unless otherwise noted, all population numbers are from the 2010 Census.

First Local Service to Point Roberts

The proposed KRPI transmitter site is suitable for tower construction and is located within the community of Point Roberts. As is demonstrated by exhibits elsewhere in this application, the proposed facility will provide daytime and nighttime service to 100% of Point Roberts.

The proposed operation will provide the first local service to Point Roberts, which is a Census Designated Place with a 2010 Census population of 1,314 persons.

No Tuck Analysis Required

Point Roberts is not located within any Urbanized Area, and the proposed KRPI facility provides daytime 5 mV/m service to only 11% of the Bellingham, WA Urbanized Area.

Indeed, the instant proposal will move KRPI away from the Bellingham, WA Urbanized Area. As is depicted on the attached map exhibit, the licensed KRPI facility places a 5 mV/m contour around 82% of the Bellingham, WA Urbanized Area, encompassing 75.8 sq km of the 91.9 sq km area of the UA.

Therefore, no “Tuck” analysis is necessary as a part of the instant proposal.

Gain and Loss Areas ¹

There is no overlap of the Point Roberts gain area and the Ferndale loss area. The full-time service gain area directly associated with the proposed KRPI operation encompasses a US land area of 13 sq km and a US population of 1,314 persons. The full-time service loss area encompasses a US land area of 149 sq km and a US population of 19,964 persons.

Loss Area Remaining Services Analysis

The proposed modification of KRPI will not result in the creation of any white, gray, or underserved areas. The following stations provide service to part or all of the Ferndale loss area:

	KIRO	710 kHz	Seattle (Class A 0.5 mV/m)	100%
	KGMI	790 kHz	Bellingham	100%
	KBAI	930 kHz	Bellingham	
	KOMO	1000 kHz	Seattle (Class A 0.5 mV/m)	100%
	KPUG	1170 kHz	Bellingham	100%
	KVRI	1600 kHz	Blaine	
	KUGS	207A	Bellingham	
	KQOW	212A	Bellingham	
	KZAZ	219A	Bellingham	
	KISM	225C	Bellingham	100%
	KAFE	281C	Bellingham	100%
	KWPZ	293C	Lynden	100%

¹In determining reception service provided by FM stations in the following analysis, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

The following populations will lose one service:

Services Remaining	Population
7	281
8	6,570
9	9,995
10	2,474
11	644

The 12 stations listed above are also the complete list of domestic stations will continue to provide full-time service to the community of Ferndale.

Gain Area Existing Services Analysis

The proposed modification of KRPI will not provide additional service to any white, gray, or underserved areas. As depicted on the attached “KRPI Gain Area Study Map”, the following stations provide service to part or all of the Point Roberts gain area:

	KARI	550 kHz	Blaine	100%
	KIRO	710 kHz	Seattle (Class A 0.5 mV/m)	100%
	KOMO	1000 kHz	Seattle (Class A 0.5 mV/m)	100%
	KPUG	1170 kHz	Bellingham	100%
	KVRI	1600 kHz	Blaine	100%
	KISM	225C	Bellingham	100%
	KAFE	281C	Bellingham	100%
	KWPZ	293C	Lynden	100%

The following populations will gain one service:

Services Existing	Population
8	1,314

The 8 stations listed above are also the complete list of domestic stations which currently provide full-time service to the community of Point Roberts.

