

**December 2009
WIIL(FM) Channel 236B
Union Grove, WI
Section 307(b) Analysis**

By the instant minor change application, it is proposed to modify the authorization for WIIL from Channel 236B at Kenosha, WI to Channel 236B at Union Grove, WI. Unless otherwise noted, all population numbers are from the 2000 Census.

Spacing Study

A single allotment and transmitter site is proposed in this application. No change in the operating WIIL transmitter site is proposed. The allocation study exhibit included in this application demonstrates that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class B stations as prescribed in §73.207 of the Commission's Rules, with the exception of several grandfathered short-spacings for which appropriate waiver requests have been requested.

Community Coverage

The proposed Channel 236B allotment site is located 21 km from the far side of Union Grove. The standard 70 dBu contour distance for a Class B facility is 32.6 km. Therefore, the proposed allotment will provide 70 dBu service to 100% of Union Grove. Additionally, the contour map exhibit included in this application demonstrates that the proposed transmitting facility (identical to the licensed transmitting facility) will provide 70 dBu service to 100% of Union Grove.

First Local Service to Union Grove

The proposed operation will provide the first local service to Union Grove, a Village listed in the 2000 Census with a population of 4,322 persons. Kenosha will retain local service from AM station WLIP 1050 kHz and FM station WGTD 216A.

No "Tuck" Study Required

Union Grove is not located within any Urbanized Area as defined by the 2000 Census. While it is true that the 70 dBu contour (32.6 km radius) from the allotment site encompasses 100% of the Kenosha Urbanized Area, 100% of the Racine Urbanized Area, and greater than 50% of the Round

Lake Beach Urbanized Area,¹ it should be noted that the existing Kenosha Channel 236B allotment provides the same level of 70 dBu service to these Urbanized Areas. Therefore, the proposed reallocation does not raise an issue related to the migration of stations from rural areas to urbanized areas, and consequently the instant proposal does not require a “Tuck” study.

Gain and Loss Areas

Since there is no change proposed in the WIIL transmitter site, there will be no gain or loss areas associated with this proposal.

¹ In addition, the 70 dBu contour overlaps very small percentages of the Milwaukee UA and the Chicago UA, far below the 50% threshold which triggers “Tuck”.

