



March 8, 2010

**Allocation Issues and 307(b) Priorities pertaining to
changing the city of license for WJBC-FM
from Fernandina Beach, FL to Orange Park, FL**

WJBC-FM is a non-Commercial Class C2 non-Directional FM station on 91.7 MHz licensed to Fernandina Beach, FL and is licensed with 32 kW ERP at an antenna height of 68 meters height above average terrain (FCC File No. BLED-19980626KD). WJBC-FM has a Construction Permit (FCC File No. BPED 20070906AAO) to relocate southward and go directional as a 50 kW (DA-MAX) Class C2 facility (131 meters HAAT). The present application proposes to change the WJBC-FM Community of License from Fernandina Beach, FL to Orange Park, FL, downgrade WJBC-FM to a Class C3 facility, and relocate the WJBC-FM transmitter site.

Relocating WJBC-FM

Exhibit 1, attached, shows the Loss, Overlap, and Gain service areas as proposed in the instant application. The Loss Area over Fernandina Beach and Saint Marys, Florida has 68,766 persons in it and an area of 2,418.85 square kilometers. The Overlap Area has 388,191 persons and an area of 1,653.98 square kilometers. And the proposed Gain Area has 581,888 persons with an area of 1,679.57 square kilometers. All of the area calculations reported herein represent land area only.

NCE Stations in the Loss and Gain Area

Exhibit 2 shows a total of 7 Non-Commercial Educational Radio Broadcast stations that provide service to the proposed Loss Area (including WJBC-FM). It also shows two areas (marked as area 1 and area 2) that have the least number of NCE signals serving them. There are no areas in the proposed Loss Area that have less than two NCE signals excluding WJBC-FM. Therefore, the proposed relocation of WJBC-FM will create no new NCE-FM underserved, gray or white areas.

Exhibit 3 shows a total of 7 Non-Commercial Educational Radio Broadcast stations that provide service to the proposed Gain Area (including the instant WJBC-FM application). It also shows two areas (marked as area 1 and area 2) that have the least number of NCE signals serving them. There are no areas in the proposed Gain Area that have less than three NCE signals excluding the instant WJBC-FM application. The instant application will provide the Fifth NCE aural radio service to area 2 on the plot, including the city of Orange Park.

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Aural Services in the Loss and Gain Areas

Exhibit 4 is a plot of the proposed Loss Area that will be created. There are no less than 18 FM broadcast signals allotted to the area, counting the licensed WJBC-FM signal. Exhibit 5 lists the signals by Channel, Callsign, City and State. Note that Standard Broadcast AM stations were not counted in this study inasmuch as there were abundant FM signals. Accordingly, the entire loss area is considered well-served by five or more aural services.

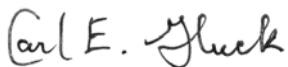
Exhibit 6 is a plot of the proposed Gain Area that will be created. There are no less than 13 FM broadcast signals allotted to the area, counting the proposed WJBC-FM signal. Exhibit 7 lists the signals by Channel, Callsign, City and State. Note that Standard Broadcast AM stations were not counted in this study inasmuch as there were abundant FM signals. Accordingly, the entire loss area is considered well-served by five or more aural services.

Stations Providing Protected Service to Present Community of License

Exhibit 8 is a plot of the FM broadcast protected service contours providing coverage to Fernandina Beach, Florida. The plot shows 19 FM contours and 1 Standard Broadcast AM Night Interference Free contour that provides service to the community (Exhibit 9 is a list of the licensed stations including WJBC-FM).

Stations Providing Protected Service to Proposed Community of License

Exhibit 10 is a plot of the FM broadcast protected service contours providing coverage to Orange Park, Florida. The plot shows 18 FM contours and 5 Standard Broadcast AM Night Interference Free contours that provide service to the community (Exhibit 11 is a list of the licensed stations including the proposed WJBC-FM operation).



Carl E. Gluck

EXHIBIT 1

Gain / Loss Population & Area Study of Proposal for WJBC-FM

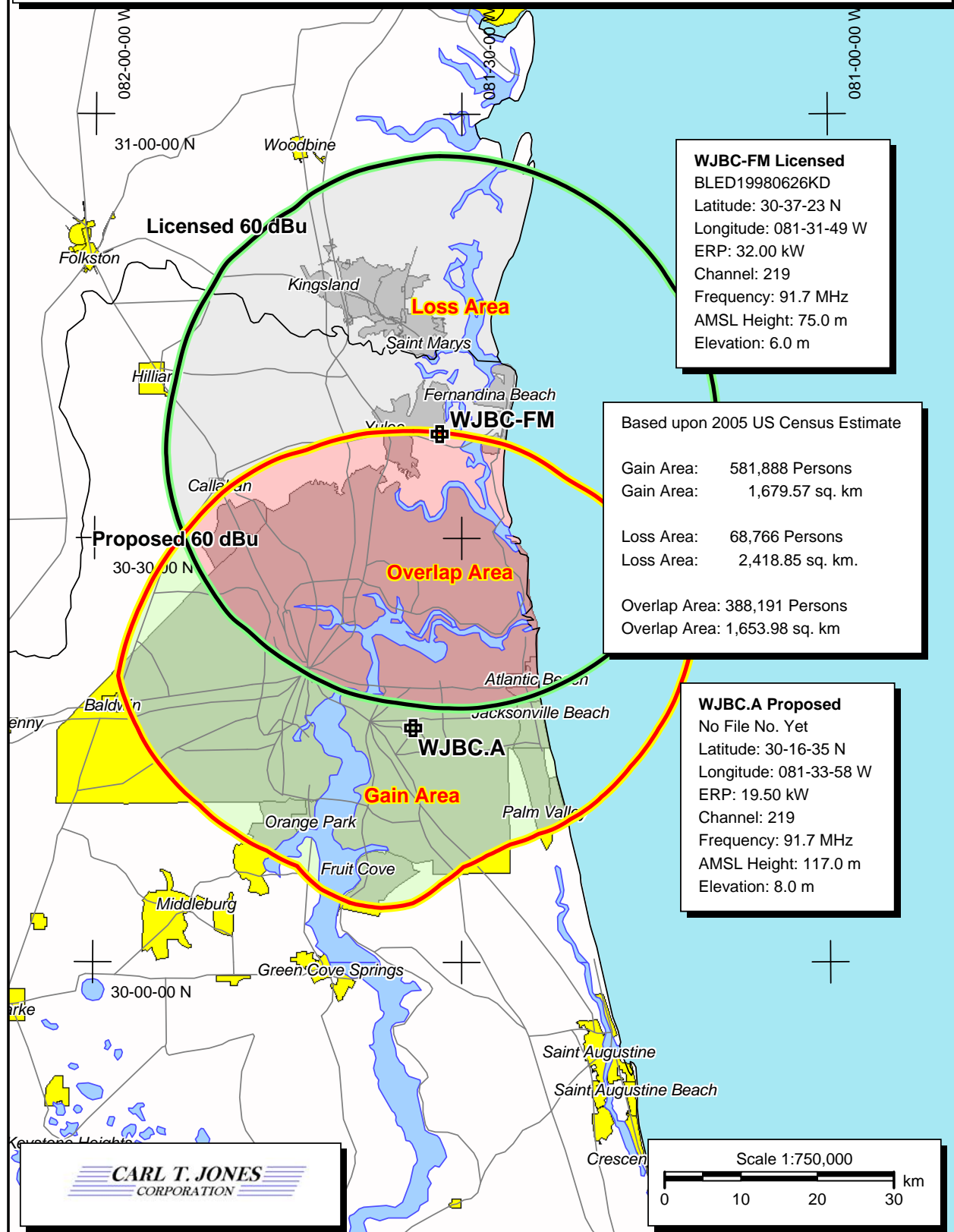


EXHIBIT 2

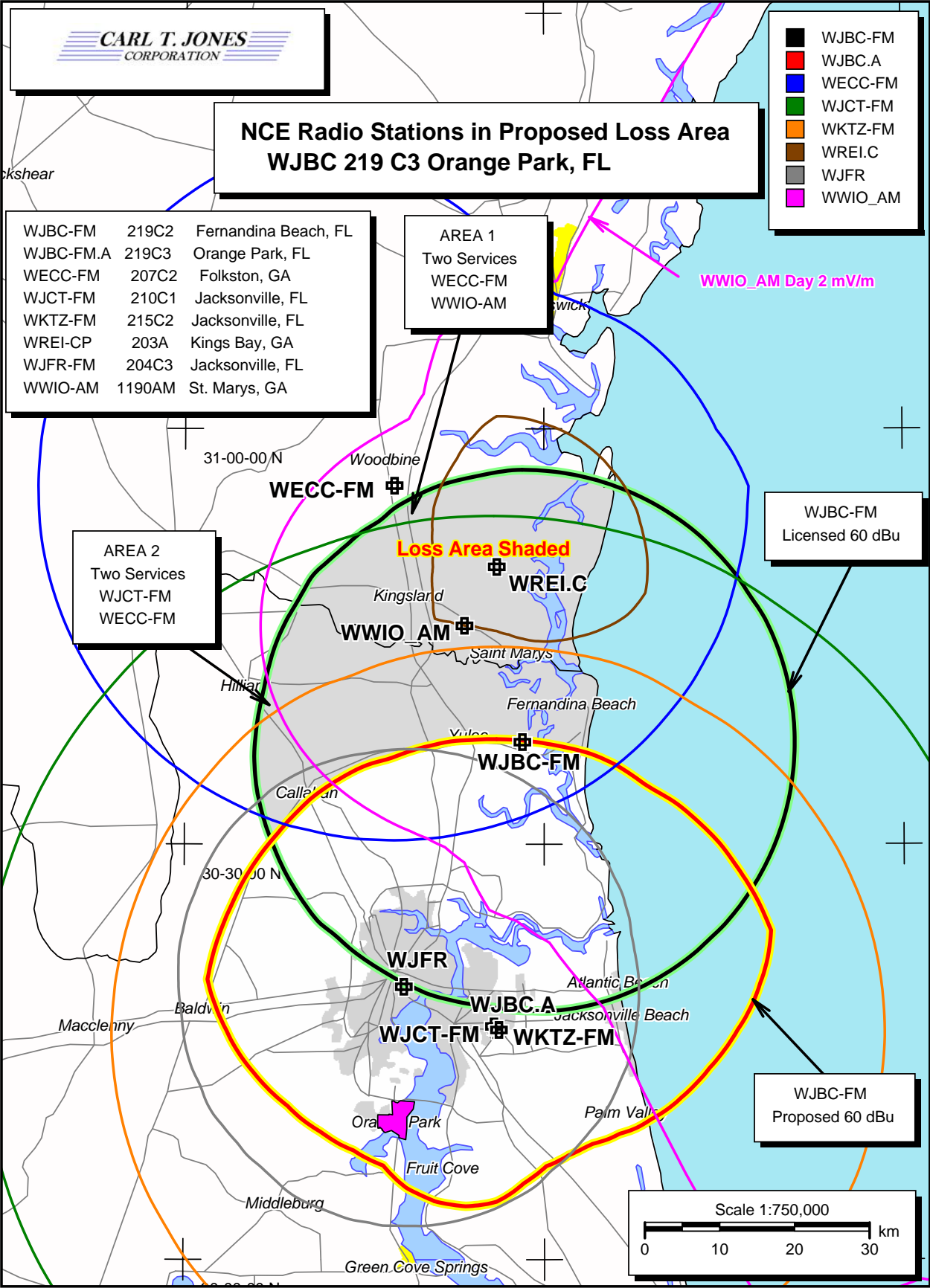


EXHIBIT 3

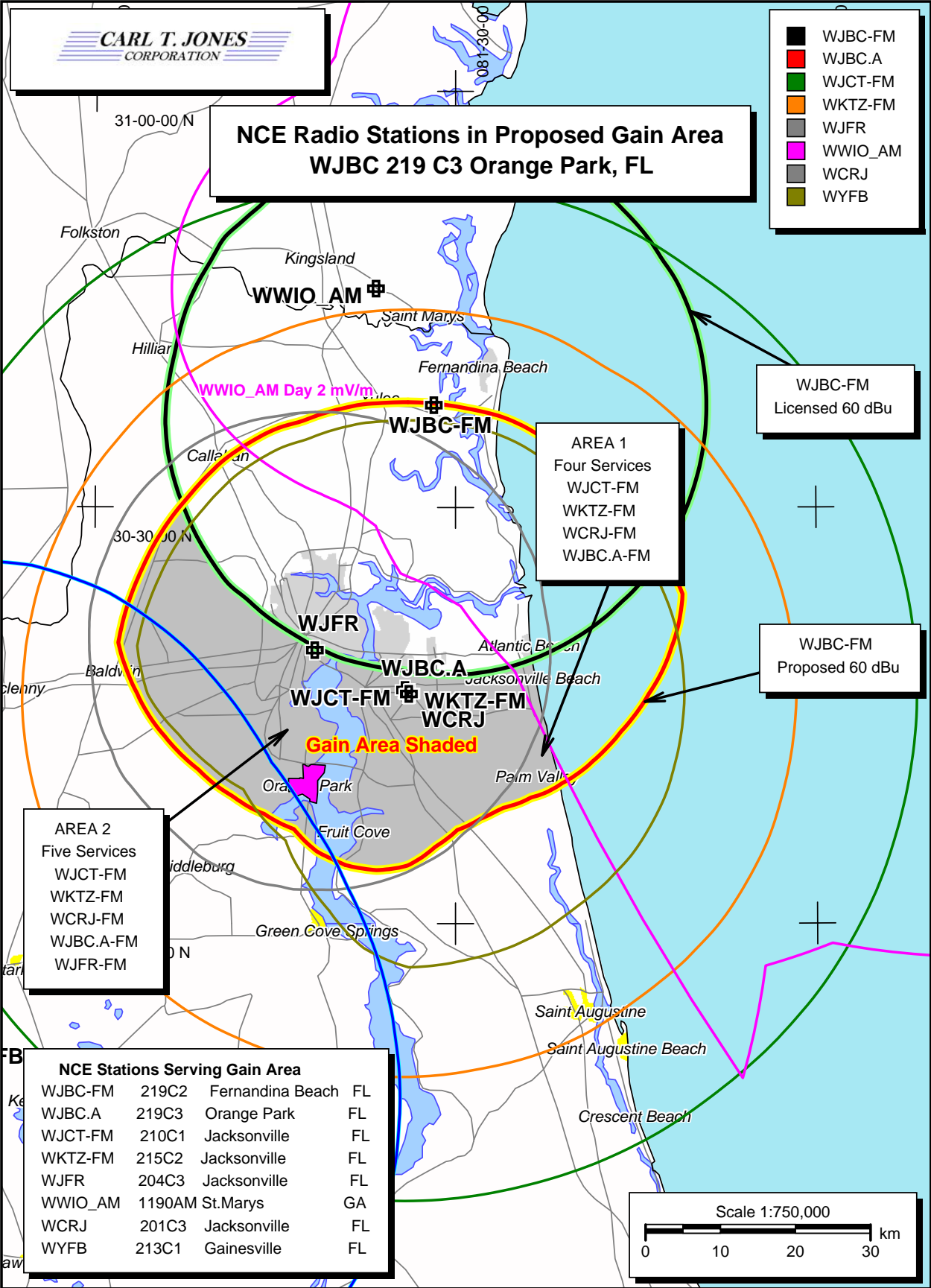


EXHIBIT 4

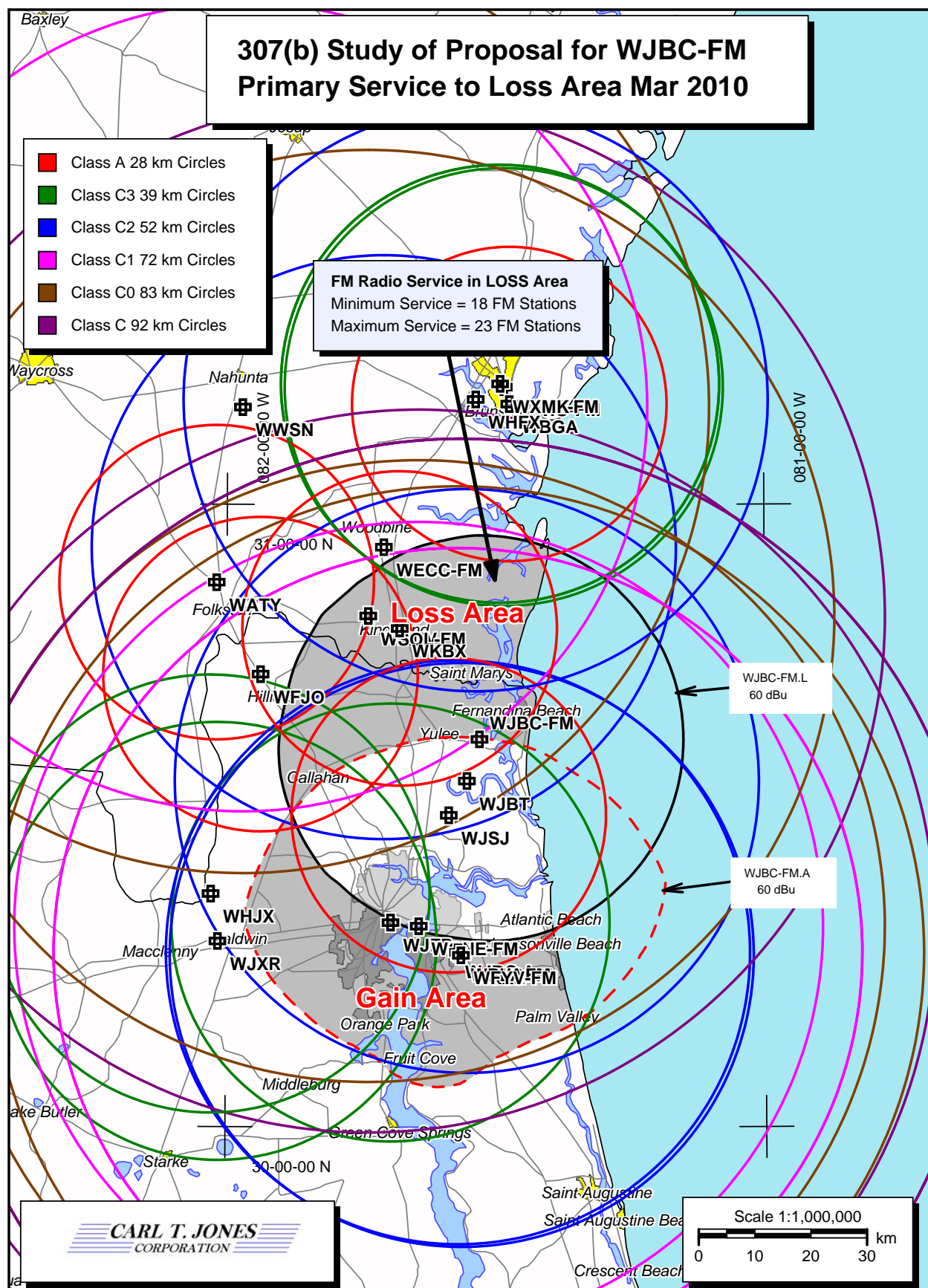


EXHIBIT 5

TABULATION OF STATIONS SERVING WJBC-FM PROPOSED RELOCATION LOSS AREA

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
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WJBC-FM	LIC	219	FM	C2	Fernandina Beach	FL	No	32.0
WJFR	LIC	204	FM	C3	Jacksonville	FL	No	8.0
WWIO-FM	LIC	205	FM	C3	Brunswick	GA	No	11.5
WECC-FM	LIC	207	FM	C2	Folkston	GA	Yes	30.0
WJCT-FM	LIC	210	FM	C1	Jacksonville	FL	No	98.0
WAYR-FM	LIC	214	FM	C3	Brunswick	GA	Yes	14.0
WKTZ-FM	LIC	215	FM	C2	Jacksonville	FL	No	50.0
WATY	LIC	217	FM	A	Folkston	GA	No	0.6
WJXR	LIC	221	FM	C3	Macclenny	FL	No	25.0
WFJO	LIC	223	FM	A	Folkston	GA	No	3.2
WBGA	LIC	224	FM	A	St. Simons Island	GA	No	6.0
WJBT	LIC	227	FM	C2	Callahan	FL	No	50.0
WAPE-FM	LIC	236	FM	C	Jacksonville	FL	No	100.0
WEJZ	LIC	241	FM	C0	Jacksonville	FL	No	100.0
WJGL	LIC	245	FM	C	Jacksonville	FL	No	100.0
WFKS	LIC	250	FM	C2	Neptune Beach	FL	No	12.5
WQIK-FM	LIC	256	FM	C0	Jacksonville	FL	No	100.0
WGNE-FM	LIC	260	FM	C1	Middleburg	FL	No	48.0
WMUV	LIC	264	FM	C0	Brunswick	GA	No	62.0
WSOL-FM	LIC	268	FM	C	Brunswick	GA	No	100.0
WYNR	LIC	273	FM	C1	Waycross	GA	No	97.0
WXXJ	LIC	275	FM	C	Jacksonville	FL	No	100.0
WWSN	LIC	277	FM	C0	Waycross	GA	No	100.0
WJSJ	LIC	287	FM	A	Fernandina Beach	FL	No	3.9
WHJX	LIC	289	FM	C3	Baldwin	FL	Yes	25.0
WXMK	LIC	290	FM	C3	Dock Junction	GA	No	15.0
WKBX	LIC	292	FM	A	Kingsland	GA	Yes	6.0
WPLA	LIC	297	FM	C1	Green Cove Springs	FL	No	98.0
WHFX	LIC	299	FM	C2	Darien	GA	No	50.0
WFYV-FM	LIC	283	FM	C	Atlantic Beach	FL	No	100.0

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EXHIBIT 6

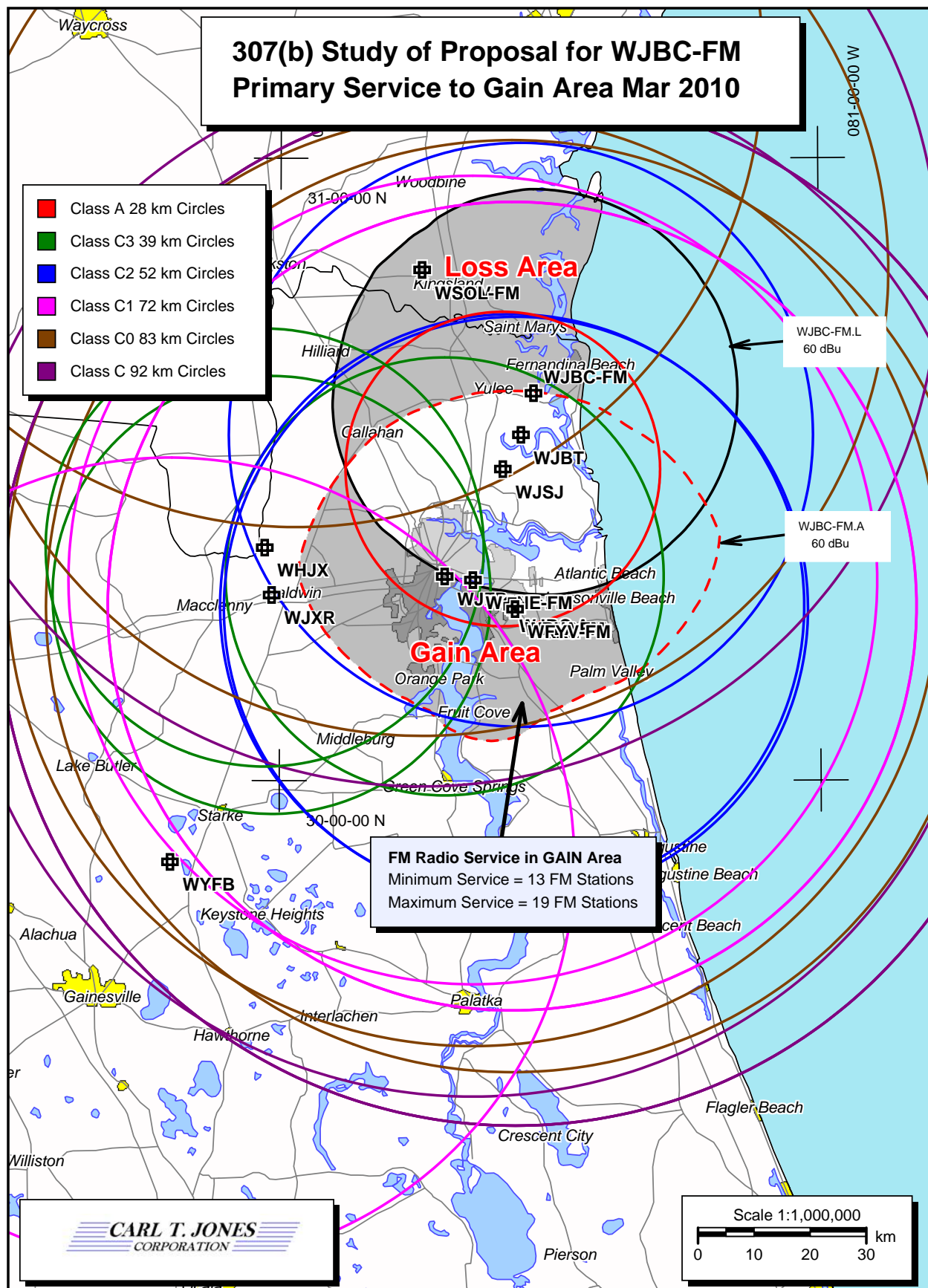


EXHIBIT 7

TABULATION OF STATIONS SERVING WJBC-FM PROPOSED RELOCATION GAIN AREA

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
-----	---	----	----	----	-----	--	--	-----
WJBC.A		219	FM	C3	Orange Park	FL	Yes	19.5
WJFR	LIC	204	FM	C3	Jacksonville	FL	No	8.0
WJCT-FM	LIC	210	FM	C1	Jacksonville	FL	No	98.0
WKTZ-FM	LIC	215	FM	C2	Jacksonville	FL	No	50.0
WJXR	LIC	221	FM	C3	Macclenny	FL	No	25.0
WJBT	LIC	227	FM	C2	Callahan	FL	No	50.0
WAPE-FM	LIC	236	FM	C	Jacksonville	FL	No	100.0
WEJZ	LIC	241	FM	C0	Jacksonville	FL	No	100.0
WJGL	LIC	245	FM	C	Jacksonville	FL	No	100.0
WFKS	LIC	250	FM	C2	Neptune Beach	FL	No	12.5
WQIK-FM	LIC	256	FM	C0	Jacksonville	FL	No	100.0
WGNE-FM	LIC	260	FM	C1	Middleburg	FL	No	48.0
WMUV	LIC	264	FM	C0	Brunswick	GA	No	62.0
WSOL-FM	LIC	268	FM	C	Brunswick	GA	No	100.0
WXXJ	LIC	275	FM	C	Jacksonville	FL	No	100.0
WWSN	LIC	277	FM	C0	Waycross	GA	No	100.0
WJSJ	LIC	287	FM	A	Fernandina Beach	FL	No	3.9
WHJX	LIC	289	FM	C3	Baldwin	FL	Yes	25.0
WPLA	LIC	297	FM	C1	Green Cove Springs	FL	No	98.0
WFYV-FM	LIC	283	FM	C	Atlantic Beach	FL	No	100.0
WYFB	LIC	213	FM	C1	Gainesville	FL	Yes	97.0

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EXHIBIT 8

Stations Providing Protected Service to Present Community of License (Fernandina Beach, FL)

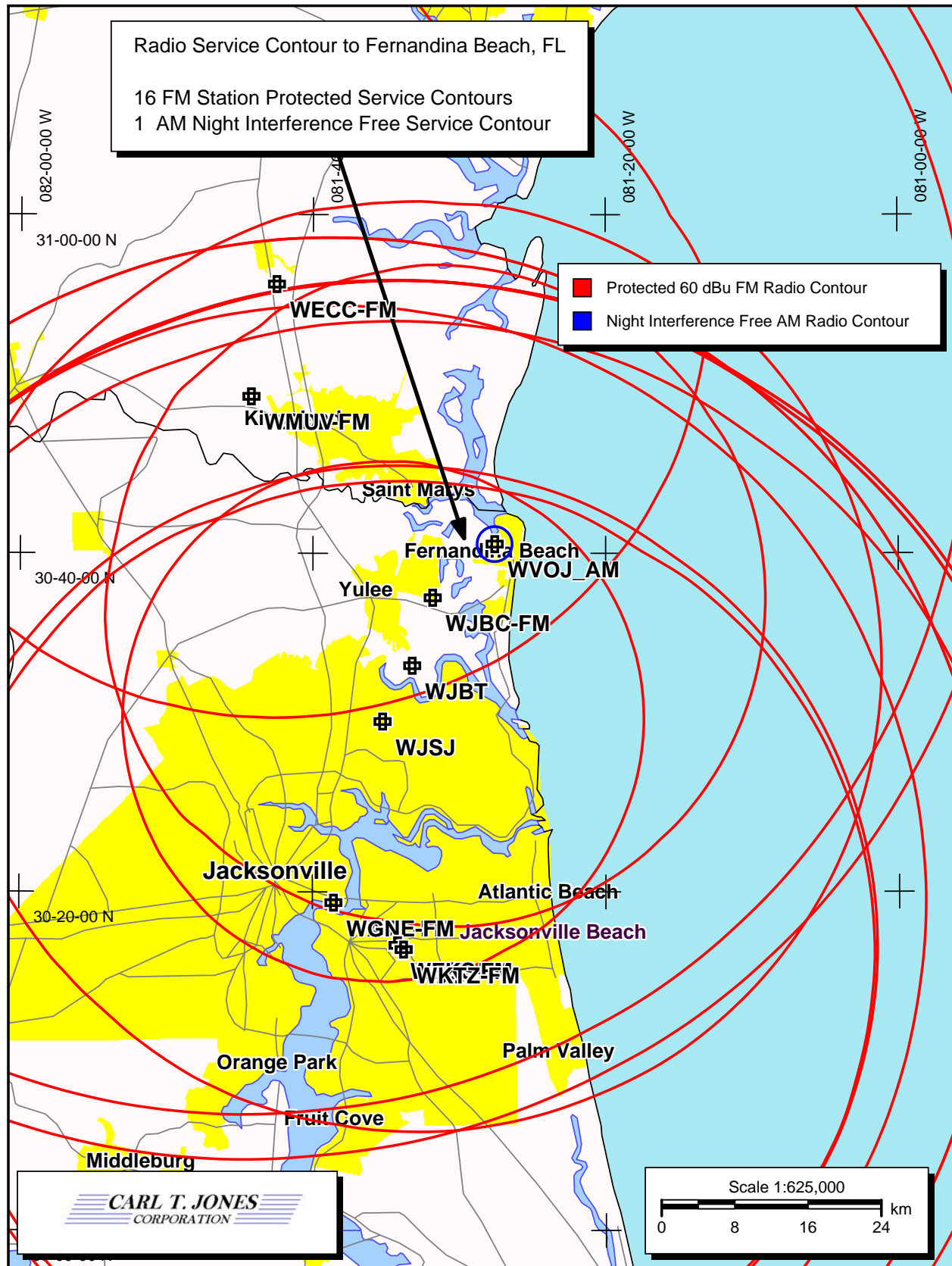


EXHIBIT 9

Tabulation of Stations Providing Protected Service to Present Community of License

Fernandina Beach Radio Service

March 2010

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
-----	---	-----	---	---	-----	--	--	-----
WJBC-FM	LIC	219	M	C2	Fernandina Beach	FL	No	32.0
WJBT	LIC	227	M	C2	Callahan	FL	No	50.0
WSOL-FM	LIC	268	M	C	Brunswick	GA	No	100.0
WEJZ	LIC	241	M	C0	Jacksonville	FL	No	100.0
WAPE-FM	LIC	236	M	C	Jacksonville	FL	No	100.0
WQIK-FM	LIC	256	M	C0	Jacksonville	FL	No	100.0
WPLA	LIC	297	M	C1	Green Cove Springs	FL	No	98.0
WXXJ	LIC	275	M	C	Jacksonville	FL	No	100.0
WJGL	LIC	245	M	C	Jacksonville	FL	No	100.0
WFYV-FM	LIC	283	M	C	Atlantic Beach	FL	No	100.0
WGNE-FM	LIC	260	M	C1	Middleburg	FL	No	48.0
WJCT-FM	LIC	210	M	C1	Jacksonville	FL	No	98.0
WJSJ	LIC	287	M	A	Fernandina Beach	FL	No	3.9
WFKS	LIC	250	M	C2	Neptune Beach	FL	No	12.5
WKTZ-FM	LIC	215	M	C2	Jacksonville	FL	No	50.0
WECC-FM	LIC	207	M	C2	Folkston	GA	Yes	30.0
WMUV	LIC	264	M	C0	Brunswick	GA	No	62.0
WVOJ_AM	LIC	1570	AM	D	Fernandina Beach	FL	No	.003

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Stations Providing Protected Service to Proposed Community of Licensed (Orange Park, FL)

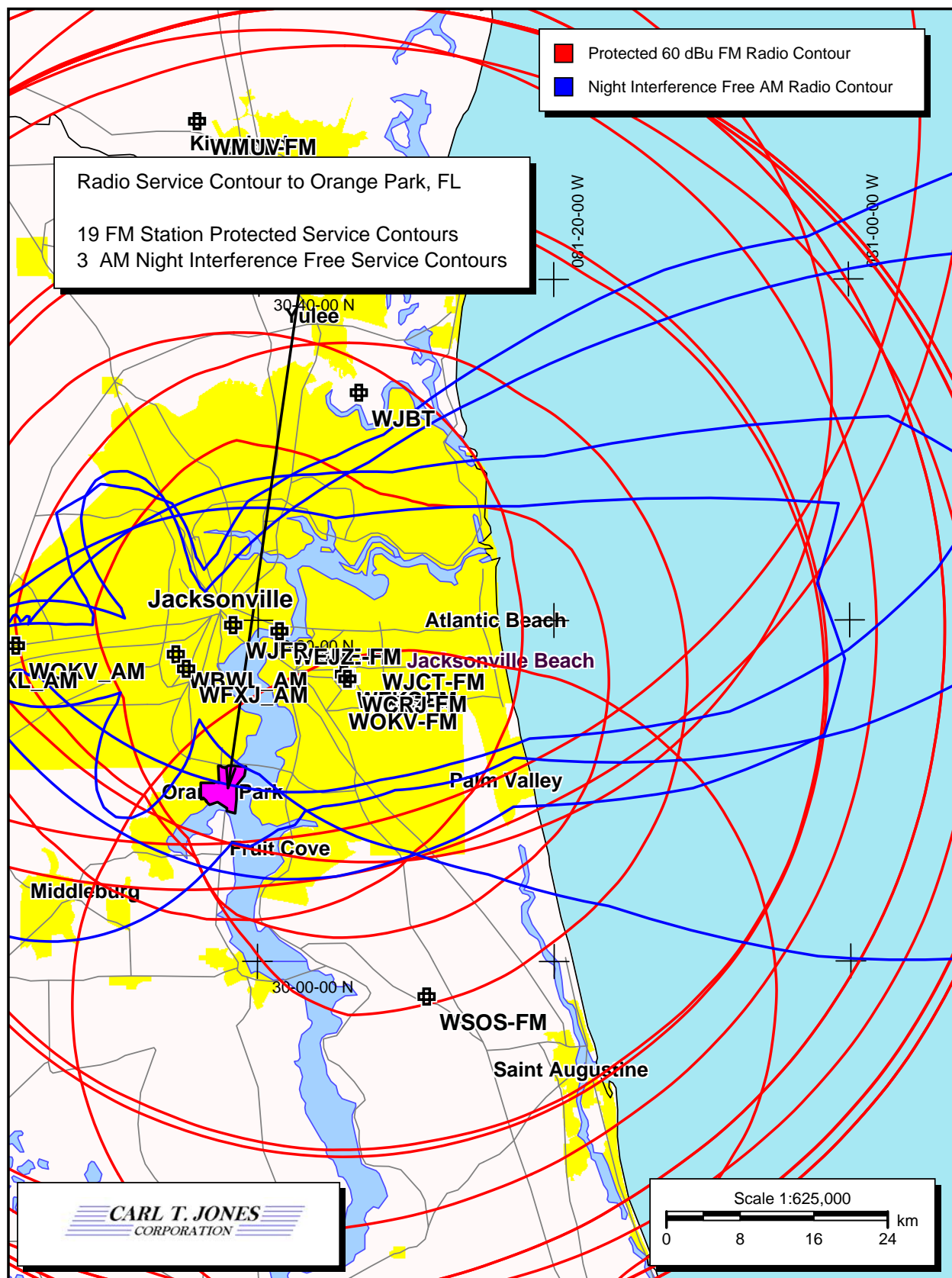


EXHIBIT 11

Tabulation of Stations Providing Protected Service to Proposed Community of License

Orange Park Radio Service

March 2010

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
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WJBC-FM.A	APP	219	FM	C3	Jacksonville Beach	FL	Yes	19.5
WJBT	LIC	227	FM	C2	Callahan	FL	No	50.0
WSOL-FM	LIC	268	FM	C	Brunswick	GA	No	100.0
WAPE-FM	LIC	236	FM	C	Jacksonville	FL	No	100.0
WQIK-FM	LIC	256	FM	C0	Jacksonville	FL	No	100.0
WPLA	LIC	297	FM	C1	Green Cove Springs	FL	No	98.0
WXXJ	LIC	275	FM	C	Jacksonville	FL	No	100.0
WJGL	LIC	245	FM	C	Jacksonville	FL	No	100.0
WFYV-FM	LIC	283	FM	C	Atlantic Beach	FL	No	100.0
WGNE-FM	LIC	260	FM	C1	Middleburg	FL	No	48.0
WJCT-FM	LIC	210	FM	C1	Jacksonville	FL	No	98.0
WFKS	LIC	250	FM	C2	Neptune Beach	FL	No	12.5
WKTZ-FM	LIC	215	FM	C2	Jacksonville	FL	No	50.0
WEJZ	LIC	241	FM	C0	Jacksonville	FL	No	100.0
WCRJ	LIC	201	FM	C3	Jacksonville	FL	Yes	8.0
WOKV-FM	LIC	293	FM	A	Ponte Vedra Beach	FL	Yes	6.0
WMUV	LIC	264	FM	C0	Brunswick	GA	No	62.0
WJFR	LIC	204	FM	C3	Jacksonville	FL	No	8.0
WSOS-FM	LIC	231	FM	C3	Fruit Cove	FL	No	25.0

WOKV_AM		690	AM	B	JACKSONVILLE	FL	YES	25.0
WJXL_AM		1010	AM	B	JACKSONVILLE BEACH	FL	YES	30.0
WFXJ_AM		930	AM	B	JACKSONVILLE	FL	YES	5.0

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