

Allocation Study**Compliance with 47 C.F.R. 73.207**

Considering the proposed contingently filed channel change of KSKR-FM Sutherlin OR, the proposed facility meets all minimum distance separation requirements with regard to commercial co-channel, first, second, or third adjacent channel stations, and those separated by 53/54 channels, as can be seen in the following channel scan:

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REFERENCE                                     DISPLAY DATES
42 17 52.0 N.                                CLASS = A      DATA 04-23-12
122 45 00.0 W.                                Current Spacings to 3rd Adj. SEARCH 04-23-12
----- Channel 266 - 101.1 MHz -----

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Call	Channel	Location	Azi	Dist	FCC	Margin
KLMD	APP 266C3	Talent	OR 0.0	0.00	141.5	-141.5
KLMD	RSV-A 266C3	Talent	OR 0.0	0.00	141.5	-141.5
KLMD.P	USR 266C3	Talent	OR 0.0	0.00	141.5	-141.5
**1496516%	APP 265C0	Malin	OR 103.2	94.90	151.5	-56.6
**1496836%	RSV-A265C0	Malin	OR 103.2	94.90	151.5	-56.6
**1496855%	APP 265C1	Malin	OR 103.2	94.90	132.5	-37.6
**NEW%	RSV-A265C1	Malin	OR 103.2	94.90	132.5	-37.6
*KSKR-FM%	APP 266C3	Sutherlin	OR 333.8	112.75	141.5	-28.8
KSKR-FM	LIC 266C3	Sutherlin	OR 337.8	129.14	141.5	-12.4
KWCA	LIC-N 266C2	Palo Cedro	CA 173.9	183.55	165.5	18.1
*KSKR-FM.P	USR 265C3	Sutherlin	OR 333.8	112.75	88.5	24.3
R14895	ADD 265C3	Sutherlin	OR 337.8	129.14	88.5	40.6
1488777	APP 263A	Malin	OR 103.2	94.90	30.5	64.4

Therefore, the proposed facility is in compliance with 47 C.F.R. 73.207.

***NOTE:** The facility contemplated herein is being filed along with a request for channel change by Order to Show Cause for KSKR-FM.

****NOTE:** The application to upgrade the allocation NEW 263A Malin, Oregon to NEW 265C1 Malin, Oregon filed on 4/19/2012 was filed after the KLMD application (BPH-20120210AAH) that had been submitted on 2/10/2012, and did not protect that application. The KLMD application, as the first-filed application, should have been protected. Therefore, the application for the channel change for the new station in the Malin was not considered in this allocation study.

Request for Order to Show Cause

Section 316(a) of the Communications Act of 1934, as amended, permits the FCC to modify a station's license or permit if such action is in the public interest. As demonstrated below, the proposed modification of KLMD(FM) would dramatically improve the station's coverage and service to the community, and thus better serve the public interest. Accordingly, James McDaniel hereby requests that KSKR(FM) Sutherlin, OR change channels from 266C3 to 265C3. James McDaniel recognizes its obligation to pay the licensee of KSKR(FM) for the reasonable costs incurred in the relocation of the station per FM Channel Assignment at Circleville and Columbus, Ohio, 8 FCC 2d 159 (1967) and commits to pay such reasonable costs if the FCC adopts the requested channel change. This channel change request is in the public interest per the showing below.

A. Service Area

The entire area currently served by the licensed facility of KLMD continues to be served when the proposed move is granted, as seen in Exhibit 29-A.

B. Gain/Loss

The proposed move to KLMD will make more efficient use of the FM spectrum and increase service to the public, as it will result in a vast increase in population served as illustrated by the exhibits below:

- Exhibit 29-B is a population report of the originally licensed facility for KLMD. As can be seen, the current facility serves an area of 254 sq. km and a population of 69,782 persons.
- Exhibit 29-C is a population report of the proposed facility. As can be seen, the proposed facility serves an area of 2,689 sq. km and a population of 190,842 persons. The entire area covered by the license is contained within the proposed contour.

Therefore, there is an overall gain of 958.66% (2,435 sq. km) of the area served, and an overall gain of 173.48% (121,060 persons) to the population served.

KSKR Allocation Study**Compliance with 47 C.F.R. 73.207**

Should the proposed KSKR channel change be granted, the new facility meets all minimum distance separation requirements with regard to commercial co-channel, first, second, or third adjacent channel stations, and those separated by 53/54 channels, as can be seen in the following channel scan:

REFERENCE
43 12 21.0 N.
123 21 55.0 W.

CLASS = C3
Current Spacings to 3rd Adj.
Channel 265 - 100.9 MHz

DI SPLAY DATES
DATA 04-23-12
SEARCH 04-23-12

Call	Channel	Location	Azi	Dist	FCC	Margin
KSKR-FM	APP 266C3	Sutherlin	OR 0.0	0.00	98.5	-98.5
KSKR-FM%	LIC 266C3	Sutherlin	OR 2.8	18.47	98.5	-80.0
1496516%	APP 265C0	Malin	OR 130.4	187.99	225.5	-37.5
1496836%	RSV-A 265C0	Malin	OR 130.4	187.99	225.5	-37.5
1496855%	APP 265C1	Malin	OR 130.4	187.99	210.5	-22.5
NEW%	RSV-A 265C1	Malin	OR 130.4	187.99	210.5	-22.5
KRWQ	LIC 262C1	Gold Hill	OR 163.1	87.36	75.5	11.9
ALLO	USE 262C1	Gold Hill	OR 163.1	87.49	75.5	12.0
KLMD	APP 266C3	Talent	OR 153.3	112.75	98.5	14.3
KLMD	RSV-A 266C3	Talent	OR 153.3	112.75	98.5	14.3
*KLMD.P	USR 266C3	Talent	OR 153.3	112.75	98.5	14.3
KMME	LIC-N 263C3	Cottage Grove	OR 23.2	67.22	42.5	24.7
KSOR	LIC-D 211C	Ashland	OR 169.0	58.19	30.5	27.7
KFLY	LIC 268C0	Corvallis	OR 353.5	121.38	86.5	34.9
KMGX	LIC 264C1	Bend	OR 58.7	190.65	143.5	47.2
ALLO	USE 264C1	Bend	OR 58.7	190.65	143.5	47.2
AL1915	USE 264C2	Depoe Bay	OR 342.6	180.83	116.5	64.3
KPPT-FM	LIC 264C2	Depoe Bay	OR 342.6	180.83	116.5	64.3
ALLO	USE 264C2	Depoe Bay	OR 342.6	180.83	116.5	64.3

*NOTE: The proposed KLMD facility is marked with a "P" following the call sign.

Respectfully submitted,

/s/ David Velasquez

David Velasquez
Technical Consultant
April 23rd, 2012

KLMD
BMPH20111020AFF
Latitude: 42-13-42 N
Longitude: 122-44-43 W
ERP: 0.40 kW
Channel: 225
Frequency: 92.9 MHz
AMSL Height: 583.0 m
Horiz. Pattern: Omni

KLMD.P
BPH20120210AAH
Latitude: 42-17-52 N
Longitude: 122-45-00 W
ERP: 0.35 kW
Channel: 266
Frequency: 101.1 MHz
AMSL Height: 1165.0 m
Horiz. Pattern: Omni

- KLMD (225)
- KLMD.P (266)

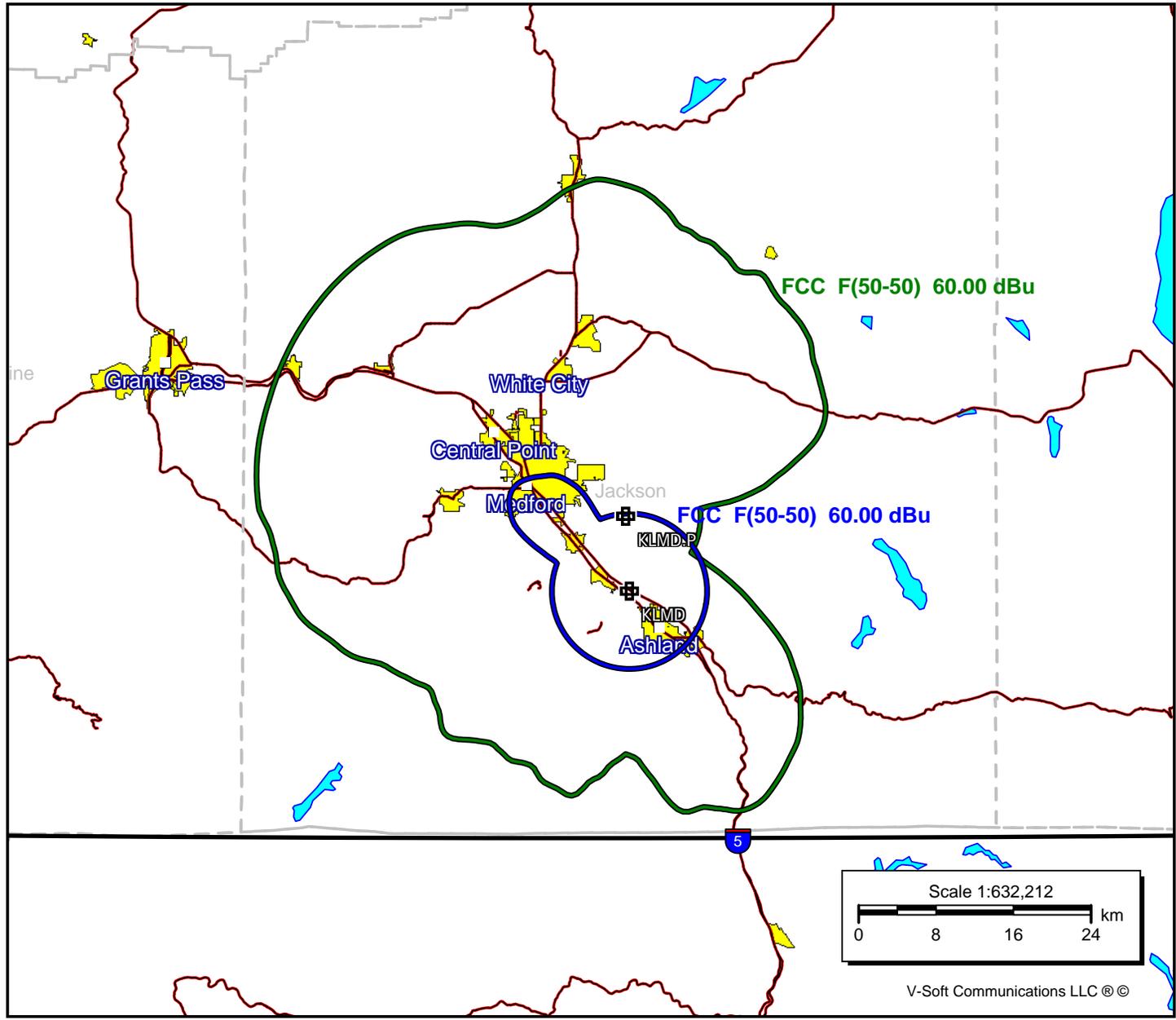


Exhibit 29-B

Population Report

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
of Radials Calculated: 360
FCC Matching HAAT Calculation Used
Field Strength: 60.00 dBuV/m

Primary Terrain: V-Soft 30 Second US Database
Secondary Terrain: V-Soft 3 Second US Terrain
Population Database: 2010 US Census (PL)

Transmitter Information:

Call Letters: KLMD
File Number: BMPH20111020AFF
Latitude: 42-13-42 N
Longitude: 122-44-43 W
ERP: 0.40 kW
Channel: 225
Frequency: 92.9 MHz
AMSL Height: 583.0 m
Elevation: 517.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Population Summary:

Total Population Within Contour: 69,782
Housing Units Within Contour: 32,833
Total Area Within Contour: 254 sq. km

	Housing Units	Population
Oregon		
Jackson County		
Total	90,937	203,206
KLMD (225)	32,833	69,782

Exhibit 29-C

Population Report

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
of Radials Calculated: 360
FCC Matching HAAT Calculation Used
Field Strength: 60.00 dBuV/m

Primary Terrain: V-Soft 30 Second US Database
Secondary Terrain: V-Soft 3 Second US Terrain
Population Database: 2010 US Census (PL)

Transmitter Information:

Call Letters: KLMD.P
File Number: BPH20120210AAH
Latitude: 42-17-52 N
Longitude: 122-45-00 W
ERP: 0.35 kW
Channel: 266
Frequency: 101.1 MHz
AMSL Height: 1165.0 m
Elevation: 1158.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Population Summary:

Total Population Within Contour: 190,842
Housing Units Within Contour: 84,772
Total Area Within Contour: 2,689 sq. km

	Housing Units	Population
Oregon		
Jackson County		
Total	90,937	203,206
KLMD.P (266)	84,772	190,842