

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Section 73.202(b),) MB Docket No. _____
Table of Allotments,) RM- _____
FM Broadcast Stations.)
(Bruce and Water Valley,)
Valley, Mississippi))

Directed to: Office of the Secretary
Attention: Media Bureau

PETITION FOR RULE MAKING

Telesouth Communications, Inc. ("Petitioner"), by its attorneys, hereby respectfully submits its Petition for Rule Making ("Petition") to substitute FM Channel 284A for vacant FM Channel 233A at Bruce, Mississippi. With respect thereto, the following is stated:

Petitioner is submitting this Petition for Rule Making as a part of a hybrid application and rule making proposal. In its concurrently filed application for construction permit for minor modification of the licensed facilities of WTNM, Water Valley, Mississippi, Petitioner is proposing to substitute FM Channel 234A for licensed FM Channel 288A at Water Valley, and to modify the license for WTNM accordingly.

Upon approval of both the WTNM modification application and the instant Petition, the facilities allotments will be as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Bruce, Mississippi	233A ¹	284A
Water Valley, Mississippi	288A ²	234A ³

- 1 – Allotment for DWCMR-FM, license surrendered by letter dated 5/4/2012
- 2 – Current FM Channel for WTNM
- 3 – Proposed FM Channel for WTNM

These revised allotments would represent a preferential arrangement of FM allotments and would advance the public interest. The changes in channels would continue to provide the community of Bruce with its first potential local transmission service and at the same time would also expand the service area of WTNM. As set forth in the attached Technical Exhibit, the expanded coverage area would include 22,351 people, while the countervailing loss area would include only 6,470 people, all of which are well-served, with at least five other services. Thus, WTNM would be able to increase the population within its primary service contour from 50,345 persons to 66,226 persons, a net increase of 15,881 persons served, which represents a *31.5 percent improvement* in the number of people receiving service. This expansion of service clearly would serve the public interest, without any significant loss of service, and no loss to any underserved area.

In order to accommodate the proposed channel change for WTNM, a short-spacing to the vacant allotment Channel 233A at Bruce, Mississippi must be resolved. This allotment may be modified to substitute Channel 284A for Channel 233A at Bruce as an alternate, but equivalent class FM channel. As shown in Exhibit A to the Technical Exhibit attached hereto, FM Channel 284A may be allotted to Bruce at a reference site of

34-02-51.0 North Latitude, 89-11-41.0 West Longitude. From this site, a Bruce station could operate in accordance with the Commission's rules and policies with regard to principal community coverage and distance separation.

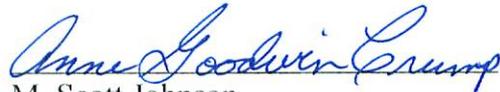
Thus, grant of the instant petition would clear the way for a modification of the WTNM facilities which would improve its service to the public and increase the number of people it can serve by 31.5 percent without an offsetting public interest negative on balance. This positive step would serve the public interest and would make more efficient use of the spectrum. If the Commission grants its requested channel change for WTNM, Petitioner certifies that it will promptly construct the modified WTNM facilities.

WHEREFORE, the premises considered, Petitioner respectfully requests that the Commission grant its petition and substitute FM Channel 284A for vacant FM Channel 233A at Bruce, Mississippi.

Respectfully submitted,

TELESOUTH COMMUNICATIONS, INC.

By:



M. Scott Johnson

Anne Goodwin Crump

Its Attorneys

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July 25, 2013

Technical Statement

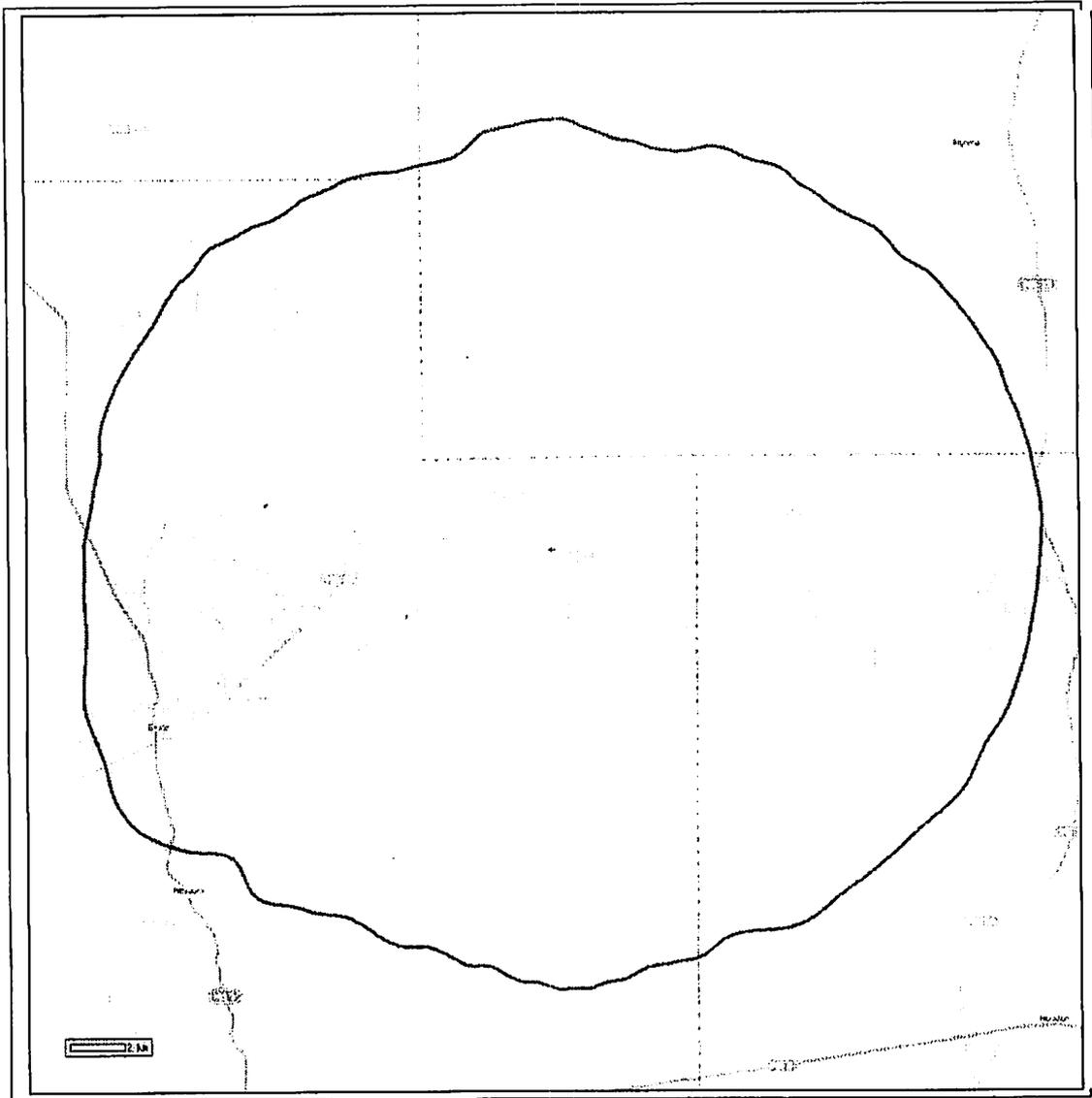
This technical statement is submitted in support of a petition for rule making to substitute Channel 284A for vacant Channel 234A at Bruce, Mississippi.

EXHIBIT A: BRUCE, MS ALLOCATION STUDY AND CONTOUR MAP

Petitioner has asked the Commission to substitute FM Channel 284A for the now vacant FM Channel 234A (DWCMR-FM) at Bruce, Mississippi. As shown below, FM Channel 284A can be allocated to Bruce to accommodate Petitioner's request.

<u>FM Channel:</u>	284A
<u>Community:</u>	Bruce, Mississippi
<u>Proposed NAD-27 Allotment Coordinates:</u>	34-02-51 N, 89-11-41 W
<u>FCC Database Date:</u>	July 4, 2013

FacID	CDBS ID	CALL	TYPE	CH	CITY	ST	DIST	REQ DIST	DIFF
43459	1043287	WJIW	LIC	284C2	GREENVILLE	MS	165.51	166.00	-0.49
84434	1220722	WQJB	LIC	283C3	STATE COLLEGE	MS	88.53	89.00	-0.47
34375	506020	WRVR	LIC	283C1	MEMPHIS	TN	135.62	133.00	2.62
59614	151897	WKZU	LIC	285C2	IUKA	MS	109.32	106.00	3.32
65200	1200315	WACRFM	LIC	287C2	COLUMBUS AFB	MS	64.26	55.00	9.26
48724	628192	WZZKFM	LIC	284C0	BIRMINGHAM	AL	229.85	215.00	14.85
84091	1405199	WGRL	CP	286A	OXFORD	MS	56.01	31.00	25.01
64673	1223226	WGNL	LIC	282C2	GREENWOOD	MS	90.60	55.00	35.60
71608	75171	KCLT	LIC	285A	WEST HELENA	AR	145.45	72.00	73.45
6482	171034	WJDXFM	LIC	286C1	KOSCIUSKO	MS	163.06	75.00	88.06
11889	252394	WGRMFM	LIC	230C3	GREENWOOD	MS	108.75	12.00	96.75



The FCC f(50,50) 70 dBu contour is shown above, and clearly encompasses 100% of the community of Bruce, Mississippi.

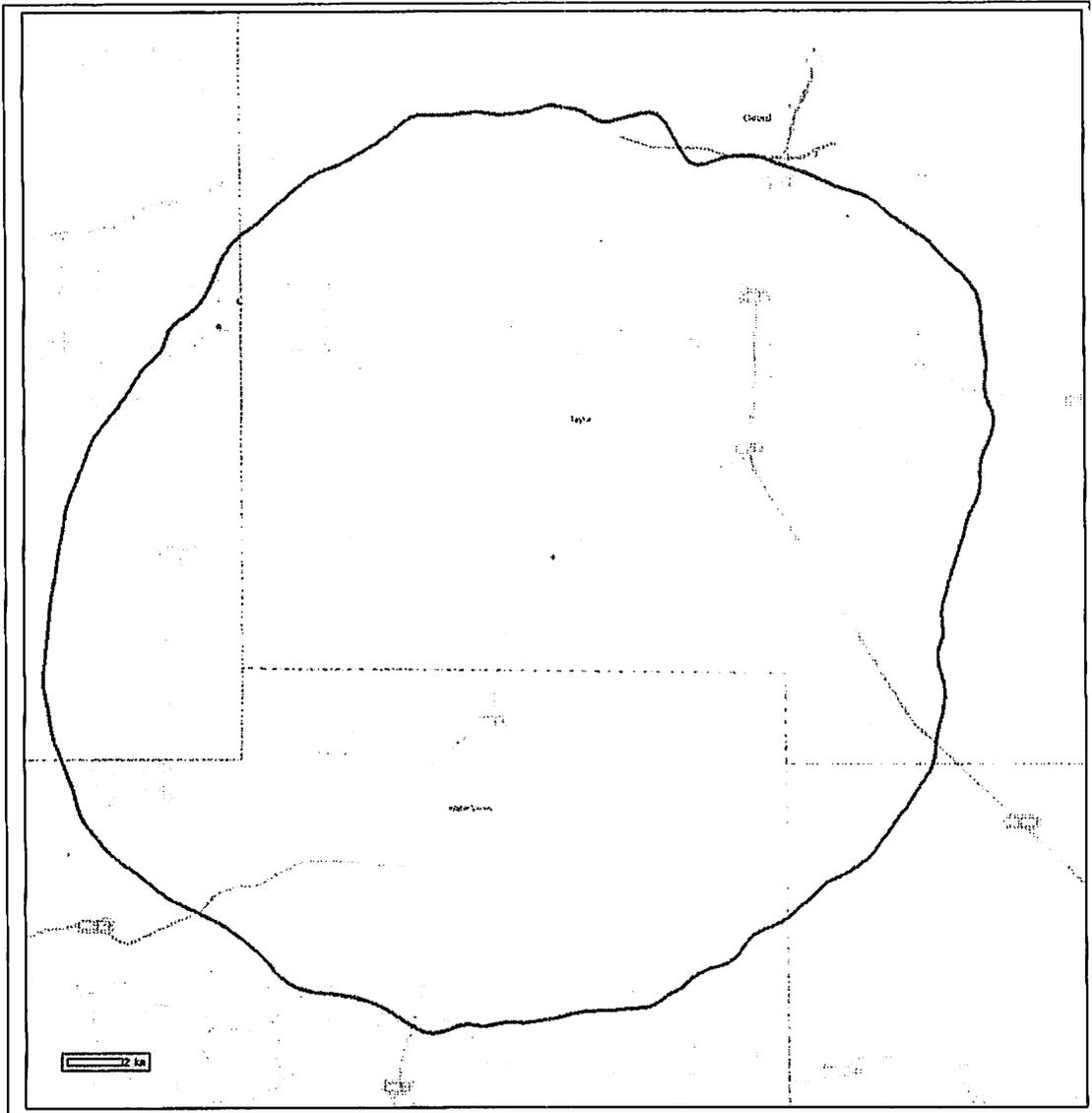
EXHIBIT B: WATER VALLEY, MS ALLOCATION STUDY / CONTOUR MAP

In a concurrently filed application, Petitioner has asked the Commission to substitute FM Channel 234A for FM Channel 288A for WTNM at Water Valley, Mississippi. As shown below, when taken in conjunction with the other proposed changes herein, FM Channel 234A can be substituted at Water Valley for WTNM at the site specified below.

FM Channel:	234A
Community:	Water Valley, Mississippi
Proposed NAD-27 Allotment Coordinates:	34-13-45 N, 89-35-57 W
FCC Database Date:	July 4, 2013

FacID	CDBS ID	CALL	TYPE	CH	CITY	ST	DIST	REQ DIST	DIFF
34291	289865	DWLFQ	VAC AL	233A	BRUCE	MS	42.40	72.00	-29.60 *
27509	1462417	WJLV	LIC	234C	JACKSON	MS	225.53	226.00	-0.47
19237	1471789	KJIW-FM	CP	233C2	HELENA	AR	107.25	106.00	1.25
6200	540101	WTNM	LIC	288A	WATER VALLEY	MS	13.74	10.00	3.74
19237	429842	KJIW-FM	LIC	233C3	HELENA	AR	97.39	89.00	8.39
859	1448784	WKVF	LIC	235C3	BARTLETT	TN	104.66	89.00	15.66
31865	175976	WOJG	LIC	234A	BOLIVAR	TN	131.53	115.00	16.53
61281	262966	WONA-FM	LIC	236C3	WINONA	MS	73.06	42.00	31.06
2686	178680	WKQK	LIC	231C2	GERMANTOWN	TN	87.73	55.00	32.73
24531	181764	WKOR-FM	LIC	235C2	COLUMBUS	MS	148.34	106.00	42.34
16790	1204197	WEBL	LIC	237A	COLDWATER	MS	73.66	31.00	42.66
16790	1450775	WEBL	CP	237A	COLDWATER	MS	78.45	31.00	47.45
61281	1560086	WONA-FM	VAC AL	236A	SHERMAN	MS	80.13	31.00	49.13
61281	1552342	WONA-FM	APP	236A	SHERMAN	MS	84.80	31.00	53.80
189500	1540261	NEW	APP	236A	VAIDEN	MS	92.64	31.00	61.64
189500	1560084	NEW	VAC AL	236A	VAIDEN	MS	92.64	31.00	61.64
52903	1421110	KLJK	LIC	234A	WEINER	AR	185.63	115.00	70.63
66281	422021	WXRZ	LIC	232C3	CORINTH	MS	113.68	42.00	71.68
61366	171953	KHKN	LIC	235C	MAUMELLE	AR	242.10	165.00	77.10
16552	291767	DWRKG	VAC AL	237A	DREW	MS	111.99	31.00	80.99
191534	1560207	NEW	APP	237A	DREW	MS	111.99	31.00	80.99
65200	1200315	WACR-FM	LIC	287C2	COLUMBUS AFB	MS	106.08	15.00	91.08
70264	1027289	WZBQ	LIC	231C0	CARROLLTON	AL	178.78	86.00	92.78

* - This short-spacing is resolved by the substitution of FM Channel 284A for FM Channel 233A at Bruce, Mississippi, proposed herein.



The FCC f(50,50) 70 dBu contour is shown above, and clearly encompasses 100% of the community of Water Valley, Mississippi.