

April 2013
KWHL(FM) Channel 293C1
Anchorage, AK
Statement re Community Coverage

By legal definition, there exists no "city" of Anchorage, Alaska. Rather, Anchorage exists as a borough of the State of Alaska. A "borough" in Alaska is the geopolitical equivalent of a county in most other states. The land area of the Anchorage Borough comprises 4,397 square kilometers. Extensive portions of this area are rugged and uninhabitable, covered by the peaks and glaciers of the Chugach Mountain Range. There exist no other legal municipalities within the Anchorage Borough other than the Anchorage Borough itself.

The "city" of Anchorage, as it is generally defined, consists of the urbanized portion of the Anchorage Borough, located at the western extremity of a peninsula that extends between Knik Arm and Turnagain Arm, two arms of Cook Inlet. The city is bounded on the north, south, and west by water, and all along its eastern perimeter by extremely rugged and massive mountains. Well over 90% of the population of the Anchorage Borough lives within the urbanized area. The Anchorage Urbanized Area is indicated on the attached contour map exhibit, and is entirely encompassed by the proposed 70 dBu contour.

The mountainous terrain along the eastern margin of urbanization is above 1000 feet AMSL within 15 kilometers of the shoreline of Knik Arm, the northwesterly limit of the city, except for the narrow canyons of Eagle River and North Creek. The urbanization does not extend above the 1000 foot elevation contour except for a few very limited cases.

It would be neither technically possible nor economically feasible to construct an FM facility which would provide 70 dBu F(50,50) city grade coverage to the entire extent of the Anchorage Borough. Thus, a waiver of these requirements with respect to KWHL would be consistent with previous Commission grants both previously to KWHL and to other stations licensed to Anchorage.

The city grade contour from the KWHL facility proposed herein would encompass 254,274 persons in the Anchorage Borough. This is 87% of the 291,826 persons listed in the 2010 Census as residing in the borough. As it would not be feasible to provide 70 dBu coverage to the remaining 13% of the population scattered across the vast mountainous expanse of the Anchorage Borough, and as the proposed facility provides a 70 dBu contour to 100% of the Anchorage Urbanized Area, it is believed that a waiver of §73.315(a), concerning city-grade coverage of Anchorage, is justified.

