

EXHIBIT 36: SECTION 73.307(b) COMMUNITY OF LICENSE CHANGE INFORMATION

As detailed herein, SSR Communications, Inc. (“SSR”) respectfully requests that the Commission reallocate FM Channel 288A from Haynesville, Louisiana to Heflin, Louisiana. In support of its request, SSR puts forth the following claims: (1) Haynesville will not be stripped of any existing, licensed, or promised radio service, (2) Haynesville will not be deprived of potential future broadcast radio service and will continue to be well-served by at least five other broadcast facilities, (3) Heflin will benefit from its first local broadcast service, (4) more than *four times* as many potential listeners will be served under SSR's proposal, and that such changes will serve the interests of the public.

1. Haynesville Will Not Be Stripped Of Any Licensed Or Existing Radio Service

SSR respectfully asserts that Haynesville will not be deprived of a broadcast radio service as a result of the changes contemplated herein. No station currently exists in Haynesville, meaning that Haynesville could not possibly be deprived of its only radio service. Additionally, SSR has not informed Haynesville residents of its intentions to construct a radio station at Haynesville, so there is no expectation within the community that a new radio station will be forthcoming. Commission precedent clearly supports SSR's position that relocation of a “never constructed” facility from one community to another is not akin to the deletion of actual service, upon which the initial community may have come to rely. In both *Vernon Center and Eagle Lake, Minnesota, 2006 FCC Lexis 6633 (2006)*, and *Loretto, Tennessee and Killen, Alabama, 21 FCC Rcd 5834 (2006)*, the Commission allowed the applicant to specify a new community of license, even though the initial community was left without an allotment as a result of the change. In this case, however, SSR is even proposing to back-fill Haynesville with a mutually-exclusive alternate FM channel, meaning that:

2. Haynesville Will Not Be Deprived Of Potential Future Service And Is Presently Well-Served

In a related application, BNPH-20130624AAP and accompanying Petition For Rulemaking (currently PRM13MB at the Commission while awaiting a more formal designation), SSR has filed to

back-fill the community of Haynesville with FM Channel 286A, a mutually-exclusive proposal only technically eligible for grant in the event that FM Channel 288A is reallocated to Heflin. SSR has already applied for this channel, but in the event that FM Channel 286A is allocated to Haynesville, SSR asserts its intention to participate in a future auction for the channel and construct the station.

Even when a new FM allotment at Haynesville is not considered, however, Haynesville will continue to be well-served by at least five other licensed FM and AM stations:

<u>FM Call Sign</u>	<u>Facility ID</u>	<u>F(50,50) Signal Strength</u>
KIXB	48946	73.43 dBu
KTKC-FM	62034	70.52 dBu
KYXA	49880	68.65 dBu
KXKZ	58273	61.22 dBu
KTAL-FM	33728	60.23 dBu
<u>AM Call Sign</u>	<u>Facility ID</u>	<u>Signal Strength</u>
KWKH	60266	6.34 mV/m

3. Heflin Will Receive Its First FM Service

SSR maintains that Heflin is deserving of FM service. Although Heflin also receives protected service from at least five other licensed FM facilities (KBEF, KLKL, KYXA, KHKZ, KRLQ, KVKI-FM, KRMD-FM, KRUF, KVMA-FM, KQHN, KXKS-FM, KDAQ, KHCL, KMJJ-FM, and KLHV), nearly all of these stations serve one of two concentrated urban areas: the Shreveport, Louisiana radio market or the Ruston-Monroe, Louisiana radio market. The technical facilities proposed herein will not reach either. Additionally, it is presently impossible for the proposed facilities to be modified to encompass 50% or more of either the Shreveport or Ruston-Monroe radio markets with a city-grade (or even protected-grade) signal contour.

The community of Heflin is deserving of its own FM service. Heflin is located in Webster, Parish, Louisiana, and is home to 244 residents, according to the 2010 United States Census. Heflin is home to its own municipal government, United States Post Office and Zip Code (71039), school

(Heflin Elementary School), fire department, local library, numerous churches, and many other businesses. Heflin is an incorporated community (generally sufficient for the Commission's allotment purposes), independent of any neighboring communities, and is clearly deserving of its own FM station, as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Haynesville, LA	288A	286A
Heflin, LA	---	288A

As outlined above, through this application, BMPH-20130913ACQ, and its underlying permit, BNPH-20130624AAQ, applicant has proposed to reallocate this existing construction permit from Haynesville to Heflin to provide Heflin with its first radio service. Additionally, through a mutually-exclusive back-fill proposal, applicant has petitioned the Commission to add FM Channel 286A to Haynesville and has applied for said facilities via application BNPH-20130624AAP. Taken together, these changes would clearly make up a preferential arrangement of the FM Table of Allotments.

4. Far More Potential Listeners Will Be Served Under This Proposal

Under SSR's proposal, a station at Heflin would be able to serve 26,985 persons within the f(50,50) 70 dBu contour (826.55 km²) and 56,613 persons within the f(50,50) 60 dBu protected-grade contour (2,524.07 km²), with each population figure derived from estimates using block centroid data from the 2010 U.S. Census. The permitted facilities at Haynesville (2010 U.S. Census population: 2,327), by contrast, would only serve 4,414 persons within the f(50,50) 70 dBu contour (579.33 km²) and 12,030 persons within the f(50,50) 60 dBu protected-grade contour (1850.17 km²). In addition to providing first local service to Heflin and not depriving Haynesville of potential future service, SSR's proposal *will result in a net increase of 44,583 persons served, or a gain of 370.6%*. Given that a facility at Heflin would serve more than *four times* as many potential listeners as compared to the permitted facilities, SSR believes that such a proposal clearly represents a preferential arrangement of the Commission's Table of Allotments.

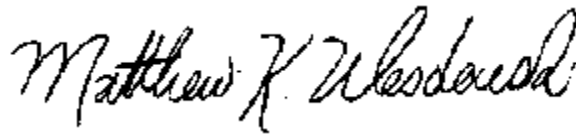
Conclusion

SSR respectfully requests that the Commission fully consider the proposal and application herein. Haynesville is presently well-served and will not be deprived of any existing or licensed FM service. Additionally, Haynesville will not be deprived of potential future service through the above-detailed related mutually-exclusive proposal to back-fill that community with an equivalent FM channel. Furthermore, Heflin would receive its first FM service and SSR's proposal would represent a net increase of 44,583 potential listeners, thereby serving the interests of the public.

(Revised Exhibit 36 - Section 307(b) Showing)

Dated: November 18, 2013

Respectfully submitted,

A handwritten signature in black ink, reading "Matthew K. Wesolowski". The signature is written in a cursive, flowing style.

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