

**Engineering Statement in Support of  
Change to the Community of License****Introduction**

Educational Media Foundation requests a community of license change for WPAY-FM from New Boston, OH to Portsmouth, OH.

Contingent processing is requested in an application filed for WUKV to change its community of license from Portsmouth, OH to New Boston, OH.

**Background**

Educational Media Foundation (EMF) is the licensee of both WPAY-FM and WUKV. EMF seeks to swap the Community of License for these two stations. The primary reason for this swap is to restore the historic call sign of WPAY-FM (FID 54813) to Portsmouth, OH. WPAY-FM was licensed to the community of Portsmouth from 1979 to 2010, a time period of 31 years. The call sign of WPAY-FM was assigned to FID 54813 from its original sign on date in 1979 until 2011, a time period of 32 years. Through a series of events, the community of license was changed to New Boston, OH and the call sign changed to WNKE. EMF acquired this facility in 2017 and changed the call sign back to WPAY-FM. EMF now seeks to restore this historically significant call sign to the original community of license of Portsmouth, OH.

In order to maintain first and second local services to New Boston, a contingent application has been filed simultaneously for WUKV (FID 65508) to change community of license from Portsmouth to New Boston.

EMF acknowledges the WPAY-FM and WUKV call signs could simply be swapped in order to once again have the WPAY-FM call sign associated with a Portsmouth, OH radio facility. The area of the community of Portsmouth is nearly ten times larger with a population of nearly nine times larger as compared to the community of New Boston. The WPAY-FM 60dbu(F50-50) contour area is nearly ten times greater and the population coverage is over seven times greater as compared to the WUKV 60dbu(F50-50) contour area and population. The association of the larger signal with the larger community is desired.

This statement is included to show that the proposed change will comply with the 307(b) fair distribution guidelines.

**Discussion**

In the instructions for the new Form 340, the FCC describes several points that are suggested for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b).

**1. Minimum Requirements**

The commission has requested that any 307(b) showing contain the following minimum information:

- Since no new technical facilities are proposed, the population and area for WPAY-FM remain as follows: the 70dBu contour contains 370,078 persons and 9,841.1 sq. km. and the 60dBu contour contains 675,520 persons and 20,038.3 sq. km. area.
- The number of stations licensed to the current community of license of New Boston, OH is 2. The number of stations licensed to the proposed community of license of Portsmouth, OH is 5.
- The number of stations providing service to the current community of license of New Boston is 12. The number of stations that provide protected service to the proposed community of license of Portsmouth is 13.
- The population of the proposed community of Portsmouth, OH is 20,226 according to the 2010 U.S. Census data.
- Description of the civic, cultural, religious, social and commercial attributes of the proposed community of license of Portsmouth, OH. Portsmouth, OH is a licensable community as shown in Exhibit 25-E.

**2. Other Relevant Information****A. Service Area**

In order to show that the community of license that is currently served by WPAY-FM continues to be served when the proposed move is granted, the following exhibits have been attached.

- Exhibit 25-A shows all facilities that serve the current WPAY-FM community of license area of New Boston, OH. Exhibit 25-A1 is a station list of the 12 facilities that completely cover New Boston.
- Exhibit 25-B also provides a color coded showing of the number of stations that provide service within the current licensed 60dbu service contour of WPAY-FM. As can be seen this area is well served by 5 or more stations in 99.5% of the service contour. The remaining 0.5% is served by 3 and 4 services as seen in the blue and green color shaded areas in Exhibit 25-B. Exhibit 25-B1 provides the population counts for each service area. No service area will be gained or lost as no technical changes are proposed in this Community of License change request.

**B. Gain/Loss**

The proposed change in the community of license of WPAY-FM will result in no gain/loss population or area since no technical changes are proposed.

- Exhibit 25-C is a population report of the licensed facility of WPAY-FM. As can be seen, the current facility serves 675,520 persons and covers an area of 20,038.3 sq. km in the 60dbu protected service contour. This contour coverage will continue to serve this same population and area.

**C. Urban Area Consideration**

Exhibit 25-D is a map which depicts the WPAY-FM 70dbu contour along with the Portsmouth, OH Urbanized Area (UA). Note this proposed change in the community of license will result in no change from one urbanized area to another urbanized area.

**3. Number of Aural Services**

Simultaneously with this application, EMF is filing an application to change the community of license for WUKV (Facility ID No. 65508) from Portsmouth, OH to New Boston, OH. Therefore, a grant of these two applications will maintain two local transmission services to New Boston, OH as reflected in the concurrently filed contingent application.

This exhibit demonstrates the combined public interest benefits that will result in the implementation of the changes proposed in the two concurrently filed applications for WPAY-FM and WUKV.

With the WPAY-FM proposed community of license change from New Boston, OH to New Portsmouth, OH, and the proposed change of the community of license for WUKV from Portsmouth, OH to New Boston, OH, the WPAY-FM former community of license of New Boston, OH, will continue to be served by the following facilities:

FIN	Call Sign	Proposed Community of License
65508	WUKV	New Boston, OH
60035	WIOI(AM)	New Boston, OH

Respectfully submitted,

James L Travis  
Signal Development  
Educational Media Foundation  
October 11, 2017

## Exhibit 25-A

### WPAY-FM

Violet Dashed Line

Latitude: 38-41-00 N

Longitude: 083-00-46 W

ERP: 100.00 kW

Channel: 281

Frequency: 104.1 MHz

AMSL Height: 676.0 m

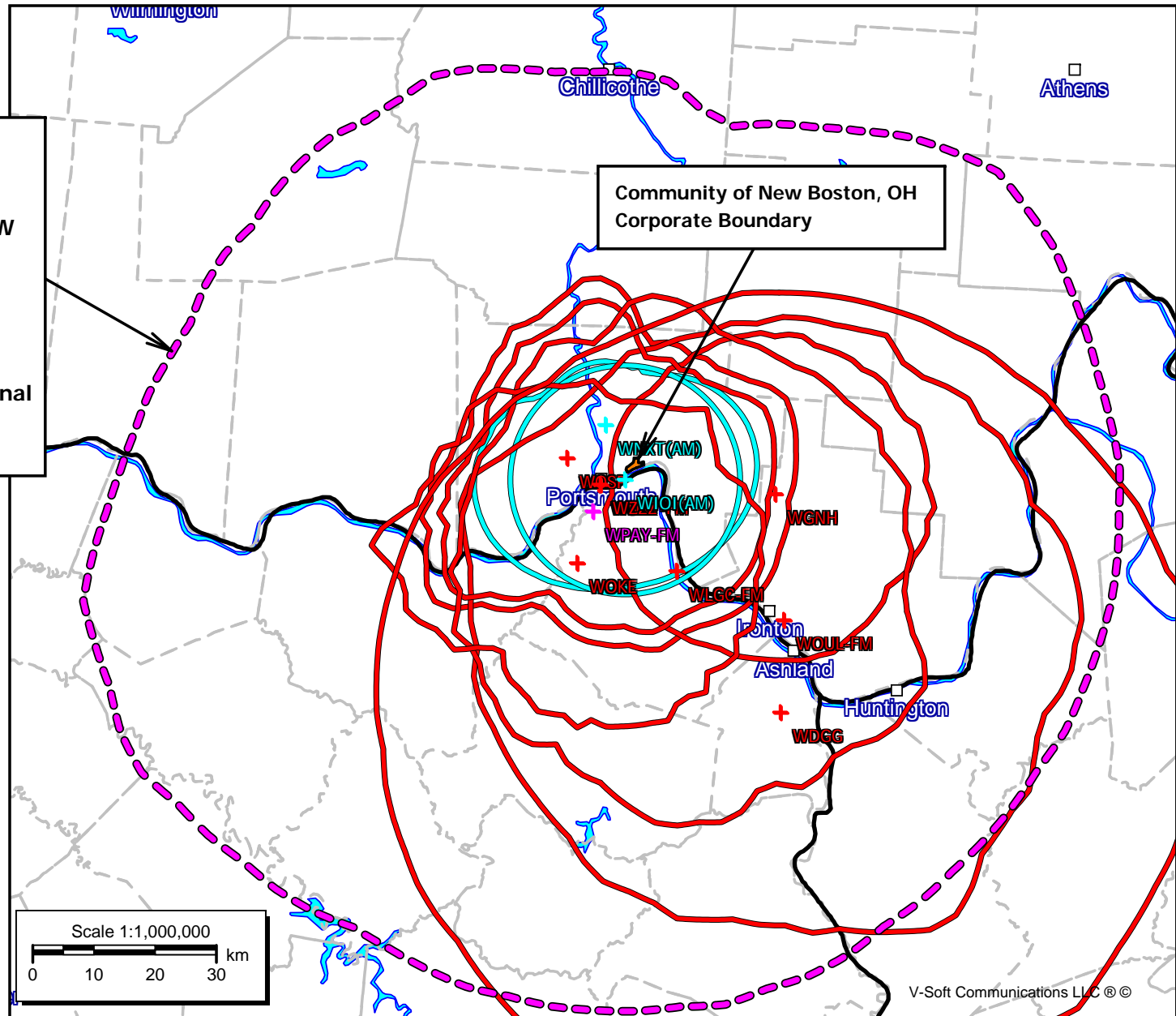
Elevation: 323.0 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None

- WPAY-FM (281)
- WDGG (229)
- WOKE (252)
- WLGC-FM (289)
- WUKV (202)
- WOUL-FM (206)
- WGNH (235)
- WNXT-FM (257)
- WOSP (218)
- WZZZ (298)
- WIOI(AM)
- WNXT(AM)



**Educational Media Foundation**  
5700 West Oaks Boulevard  
Rocklin, CA 95765

*Exhibit 25-A1*  
*Portsmouth, OH*

## **Number of Services In Reference to Community of New Boston, OH**

Reference Area: PGON: New Boston, OH

Contours that completely cover the reference area (12):

WPAY-FM (281) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WDGG (229) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOKE (252) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WLGC-FM (289) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WUKV (202) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOUL-FM (206) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOSP (218) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WGNH (235) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WNXT-FM (257) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WZZZ (298) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WIOI : Imported: 2.0 mV/m  
WNXT : Imported: 2.0 mV/m

Service Count: WPAY-FM (281): FCC F(50-50) 60.00 dBu (FCC HAAT)

- 1
- 2
- 3
- 4
- 5 or more

## Exhibit 25-B

### WPAY-FM

Violet Dashed Line

Latitude: 38-41-00 N

Longitude: 083-00-46 W

ERP: 100.00 kW

Channel: 281

Frequency: 104.1 MHz

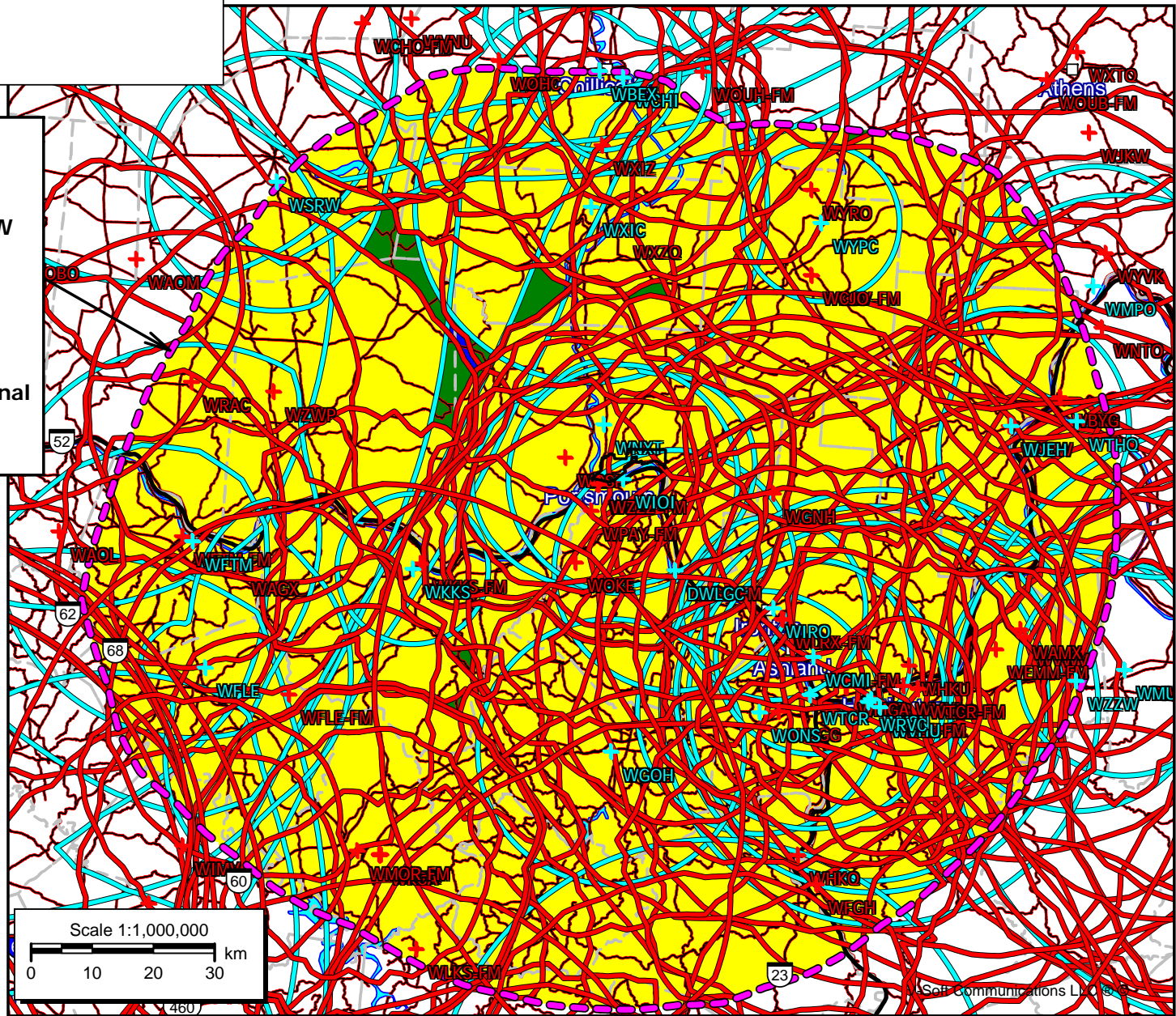
AMSL Height: 676.0 m

Elevation: 323.0 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None



## Exhibit 25-B1

Service Count Population Report - Service Count: WPAY-FM (281): FCC  
F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: WPAY-FM (281): FCC F(50-50) 60.00 dBu (FCC HAAT)  
Counting Grid Cell Size: 0.5 sq. km  
Population Database: 2010 US Census (PL)

Count Area	Population	Housing Units	Area (sq. km)
-----	-----	-----	-----
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	185	92	14.45
4 Service	3,293	1,375	260.42
5 or more	673,674	303,676	19770.17
Reference Area	677,152	305,143	20045.04

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	0	0	0.0 %
3 Service	185	185	0.0 %
4 Service	3,293	3,478	0.5 %
5 or more	673,674	677,152	100.0 %

### Services Included in Count:

WPAY-FM (281): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WBMK (203): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WIMV (207): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WMKY (212): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WKAO (216): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WBVX (221): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WHKQ (222): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WCMJ-FM (224): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WLXX (225): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WDGG (229): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WMXL (233): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WKLV-FM (234): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WFLE-FM (236): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WQHY (238): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WFTM-FM (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WIVY (242): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WGKS (245): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WJSN-FM (247): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WKCA (249): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WBUL-FM (251): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WOKE (252): FCC F(50-50) 60.00 dBu (FCC HAAT)  
 WSIP-FM (255): FCC F(50-50) 60.00 dBu (FCC HAAT)

WUGO (259): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WSGS (266): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WWQB (272): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WLKS-FM (275): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WLKT (283): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKKS-FM (285): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXKZ-FM (287): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WLGC-FM (289): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WMOR-FM (291): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WRLV-FM (293): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKYN (299): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WUKV (202): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOBO (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOUL-FM (206): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WZCP (207): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WZWP (208): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOHC (211): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WAOM (213): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOUB-FM (217): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOSP (218): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WHKU (220): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WOUH-FM (220): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WYVK (221): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WNTD (226): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKKJ (232): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WGNH (235): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WJKW (240): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKOV-FM (244): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WBVB (246): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVNU (248): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WCJO (249): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WYRO (254): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WNXT-FM (257): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WAOL (258): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXZQ (261): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXIZ (265): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WAGX (267): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXBW (268): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WRAC (276): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXTQ (288): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WCHO-FM (288): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WQLX (293): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WLRX (296): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WZZZ (298): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVRR (201): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WMUL (201): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVPB (203): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WPJY (204): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVWV (210): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WFGH (214): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WPJW (218): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WYNL (233): FCC F(50-50) 60.00 dBu (FCC HAAT)

WKWS (241): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WXCC (243): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WQBE-FM (248): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WMGA (250): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WBYG (258): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVAF (260): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKEE-FM (263): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVOW-FM (270): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WVSR-FM (274): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WTCR-FM (277): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKLC-FM (286): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WAMX (292): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKAZ-FM (297): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WEMM-FM (300): FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKYH : Imported: 2.0 mV/m  
WCHS : Imported: 2.0 mV/m  
WVHU : Imported: 2.0 mV/m  
WIOI : Imported: 2.0 mV/m  
WTHQ : Imported: 2.0 mV/m  
WCMI : Imported: 2.0 mV/m  
WGOH : Imported: 2.0 mV/m  
WIRO : Imported: 2.0 mV/m  
WNXT : Imported: 2.0 mV/m  
WMUX : Imported: 2.0 mV/m  
WTCR : Imported: 2.0 mV/m  
WYSN : Imported: 2.0 mV/m  
DWLGC : Imported: 2.0 mV/m  
WZZW : Imported: 2.0 mV/m  
WONS : Imported: 2.0 mV/m  
WJEH : Imported: 2.0 mV/m  
WRVC : Imported: 2.0 mV/m  
WFLE : Imported: 2.0 mV/m  
WKKS : Imported: 2.0 mV/m  
WMST : Imported: 2.0 mV/m  
WFTM : Imported: 2.0 mV/m  
WVLK : Imported: 2.0 mV/m  
WLAP : Imported: 2.0 mV/m  
WTVN : Imported: 2.0 mV/m  
WCHI : Imported: 2.0 mV/m  
WBEX : Imported: 2.0 mV/m  
WMPO : Imported: 2.0 mV/m  
WYPC : Imported: 2.0 mV/m  
WXIC : Imported: 2.0 mV/m  
WRFD : Imported: 2.0 mV/m  
WKFI : Imported: 2.0 mV/m  
WSRW : Imported: 2.0 mV/m  
WVSG : Imported: 2.0 mV/m  
WNOP : Imported: 2.0 mV/m  
WLW : Imported: 2.0 mV/m  
WLW : Imported: 2.0 mV/m  
WKRC : Imported: 2.0 mV/m

## Population Report

Station: WPAY-FM (281)

Contour: FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 675,520

Housing Units: 304,305

Total Area: 20,038.3 sq. km

WPAY-FM

BLED20110609AAI

Latitude: 38-41-00 N

Longitude: 083-00-46 W

ERP: 100.00 kW

Channel: 281

Frequency: 104.1 MHz

AMSL Height: 676.0 m

Elevation: 323.0 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None

## Exhibit 25-C

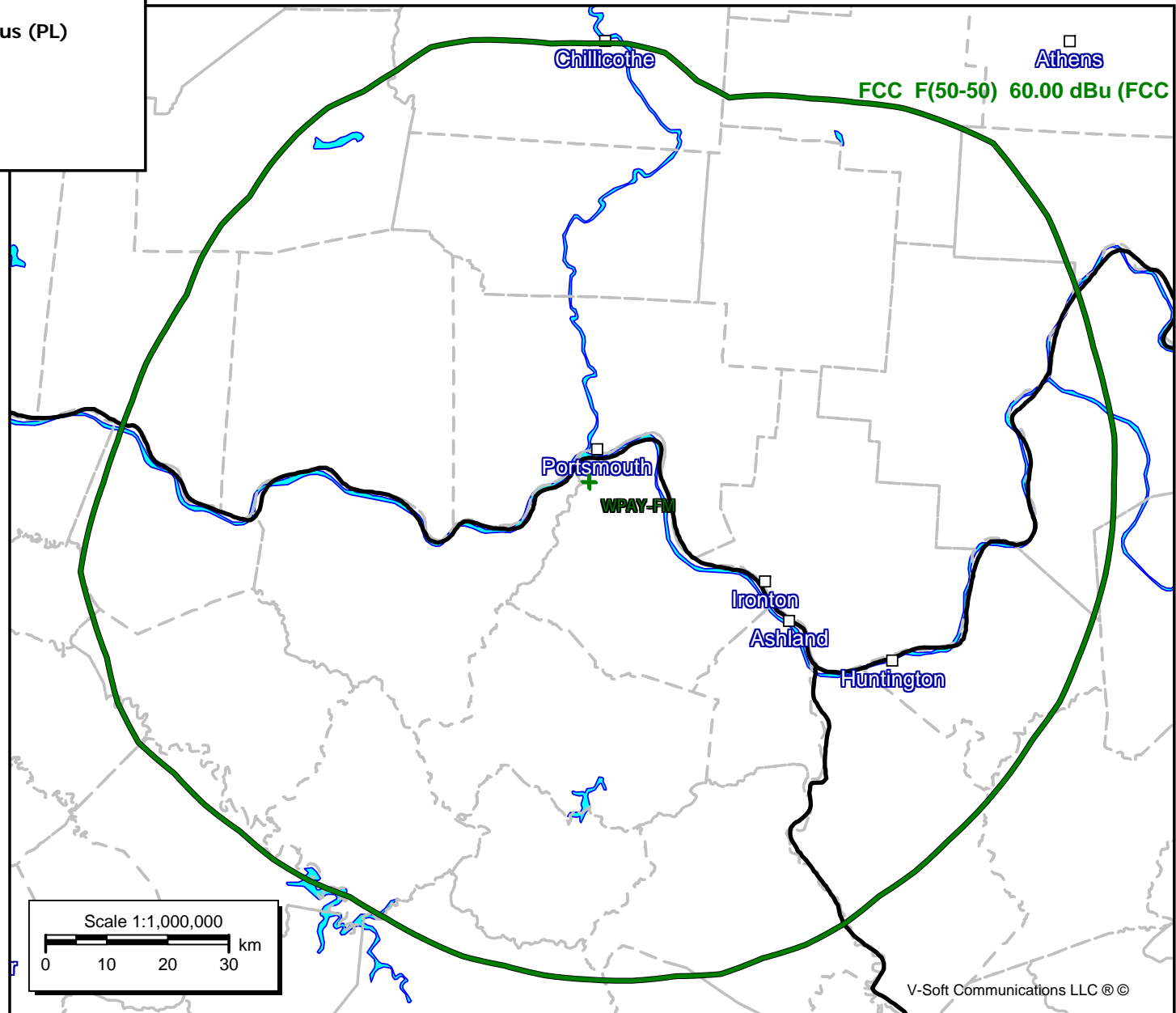
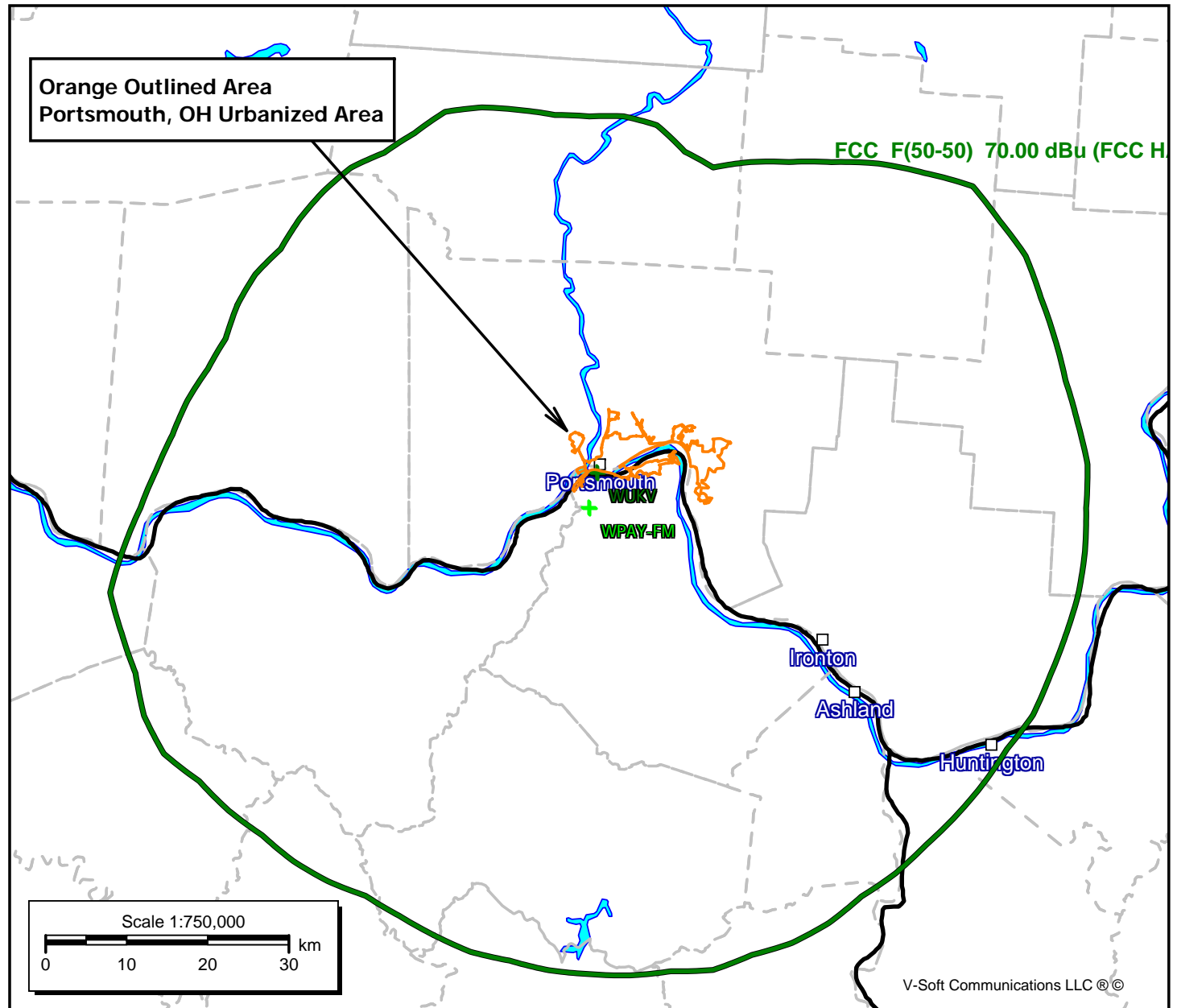


Exhibit 25-D  
WPAY 70dbu Contour and Portsmouth, OH Urban Area

WPAY-FM  
BLED20110609AAI  
Latitude: 38-41-00 N  
Longitude: 083-00-46 W  
ERP: 100.00 kW  
Channel: 281  
Frequency: 104.1 MHz  
AMSL Height: 676.0 m  
Elevation: 323.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None



### **WPAY-FM Proposed Community of License – Portsmouth, Ohio**

Portsmouth, OH is a *bona fide* community for allotment purposes. Portsmouth is a census designated place (“CDP”) with a 2010 population of 20,226. Portsmouth continues to maintain relevant residential, social and business characteristics. Portsmouth also is the community of license for 3 FM and 1 AM radio stations not included in this proposed WPAY-FM and WUKV Community of License swap.

Portsmouth has its own elected government which consists of a Mayor and Council members. Portsmouth also has a clerk and a service department supervisor. Portsmouth also has its own full time fire department and police department.

Portsmouth has its own Post Office and U.S. Postal Service Zip Code (45662). The area code of 740 covers Portsmouth and the surrounding area.

Portsmouth has numerous businesses and commercial establishments within its borders, as well as a number of churches. Portsmouth has a high school, junior high school, and two elementary schools located in Portsmouth. Portsmouth has a Public Library system with branch locations.

Portsmouth, OH is the commerce center for a broad area including Scioto County of which Portsmouth is the county seat.

For more information on the City of Portsmouth, OH visit [portsmouthoh.org/](http://portsmouthoh.org/)