

MODIFY BNPH-20041223ABI
CHANGE COMMUNITY OF LICENSE
AIREN BROADCASTING COMPANY
KZCC (FM) RADIO STATION
CH 238C3 - 95.5 MHZ - 5.0 KW
TRINIDAD, CALIFORNIA
May 2007

EXHIBIT C

City of License Change Review

This application seeks to change the community of license of the unbuilt KZCC, Channel 238C3, McCloud, California to Trinidad, California, using the recently adopted city of license change procedures, as outlined in *Revision of Procedures, 21 FCC Rcd 14212 (2006)*. ABC herein reviews the proposed change and demonstrates compliance with the Commission's rules/procedures for the change.

As indicated in Exhibit A1, at the proposed allocation/application site at Trinidad, California, Channel 238C3 meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207, provided Channel 249C3 is substituted for Channel 236C3 at McKinleyville, California. The proposed allotment at Trinidad, California is mutually exclusive with the permitted KZCC facility at McCloud, California. KZCC is not the only station authorized to McCloud, California. Southern Oregon State College was recently selected as the winner of Channel 220A at McCloud, California, and will receive a permit based on its request, as outlined in BPED-19950210MNA.¹ As a result, the

1) The sole competing application was dismissed by the Commission. Thus the Southern Oregon State College facility provides a potential service to McCloud, California.

community of Trinidad will receive its first locally licensed/operational station, without depriving McCloud of its only potential local service.

Exhibit C1 is the proposed coverage map (using actual terrain data) for KZCC at Trinidad, California and shows the proposed facility will provide a 70 dBu contour over all of the proposed new community of license.² From the proposed implementation site, a 60 dBu contour will cover 105,327 people in 4,712.0 square kilometers, and a 70 dBu contour will cover 84,927 people in 1,737.0 square kilometers. The proposed site is not located off shore, nor on airport property; therefore, it is suitable for the proposed allotment of Channel 238C3 to Trinidad, California.

Therefore, ABC proposes the following changes:

Trinidad, California

Present	Proposed
None	238C3

McCloud, California

Present	Proposed
220A, 238C3	220A

As the proposed KZCC is being relocated in order to implement service to Trinidad, California, there will be an area of signal loss and signal gain as a result of the move. The

2) A non-terrain impacted 70 dBu contour would encompass the entire community of Trinidad.

existing Channel 238C3 allotment at McCloud, California provides a 60 dBu contour, non-terrain impacted, to 18,501 persons in 4,802.9 square kilometers.³ The allotment site for Channel 238C3 to Trinidad, California will provide a 60 dBu contour, non-terrain impacted, to 94,899 persons in 4,802.9 square kilometers. As there is no area in common between the McCloud and Trinidad, California sites, the resultant move will create a loss of service to 18,501 persons in 4,802.9 square kilometers and a gain of service to 94,899 persons in 4,802.9 square kilometers.

The area of loss is shown on Exhibit C2. The area shows there are a minimum of five full time services remaining with the removal of Channel 238C3 from McCloud, California. Exhibit C3 is a tabulation of the stations providing service to the loss area.⁴ Exhibit C4 is a depiction of the services in the proposed Trinidad, California gain area. Exhibit C5 is a tabulation of stations providing service to the gain area.⁵ As indicated on Exhibit C4, there is a small area in the extreme northern portion of the Channel 238C3 allocation contour that only receives four full-time FM station services and service, during daytime hours only, from an AM station. Thus, 378 persons in 108.7 square kilometers would receive a fifth full time service from the relocated KZCC.

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- 3) All contour data is based on a radius of the maximum for the class under review with no terrain considered. Population data is 2000 US Census.
 - 4) There are additional stations shown above the minimum of five fulltime facilities. No AM stations were considered, as there were already more than five services.
 - 5) To determine services, all AM stations, and commercial and non-commercial FM stations in the area were reviewed. For AM Class A stations, the nighttime 0.5 mV/m contour was used for a service contours; all other AM stations' nighttime interference free signals were calculated and used for service contributions. For FM commercial stations, maximum facilities were used for each Class, except Class A facilities. Some Class A stations were considered 3.0 kilowatt Class A stations, while others were depicted as 6.0 kilowatt Class A stations, based on their operating facilities or spacing review. For Class C stations, the power and height of the station was used to determine the service contour, rather than a maximum Class C. Any non-commercial FM station's 60 dBu reference contour was determined from its licensed facility, based on the reference distance, that was determined by power and HAAT of the facility. The FM commercial contours assumed uniform terrain.

Trinidad is not located in any Urbanized Area, as designated by the United States Census. Therefore, no analysis of the impact to any Urbanized Area is necessary. Exhibit C6 are the stations providing protected service to Trinidad, California.⁶ Exhibit C7 is a tabulation of the stations shown on Exhibit C6. Based on the foregoing, the proposed change of community of license complies with the Commission's technical rules and regulations.

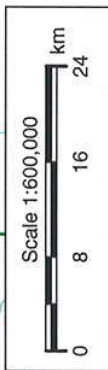
6) As the community of Trinidad's population is less than 2,500 persons, the AM contour used for protected service was the 0.5 mV/m.

123-20-00 W

123-40-00 W

124-40-00 W

41-00-00 N



Graham Brock, Inc. - Broadcast Technical Consultants

KZCC Proposed

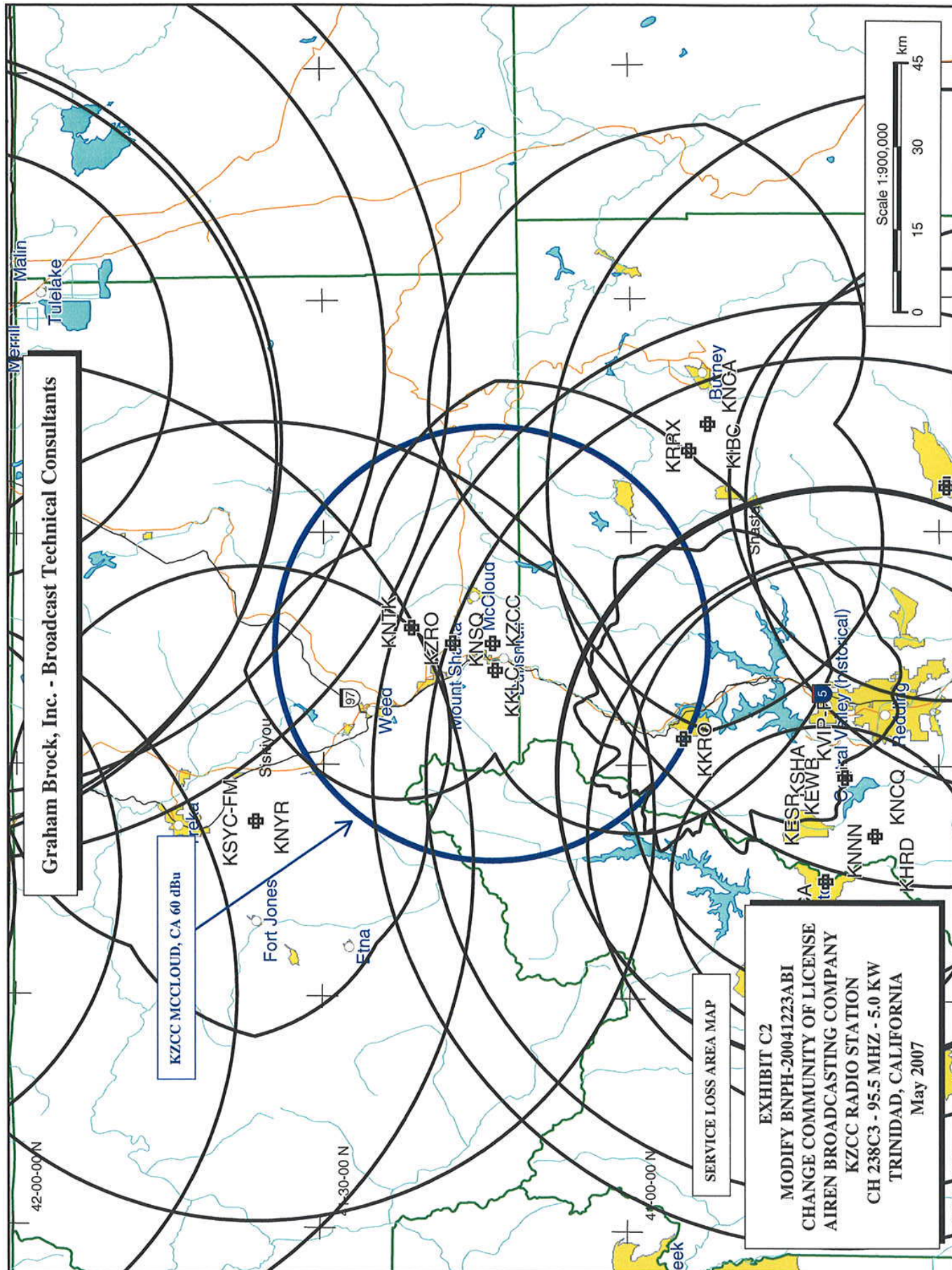
Latitude: 40-58-43 N
Longitude: 124-00-36 W
ERP: 5.00 kW
Channel: 238C3
Frequency: 95.5 MHz
AMSL Height: 483.1 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FOC
60 dBu pop.: 105,327 (2000)
60 dBu area: 4,712.0 sq. km.
70 dBu pop.: 84,927 (2000)
70 dBu area: 1,737.0 sq. km.

60 dBu (1.0 mV/m)

70 dBu (3.16 mV/m)



EXHIBIT C1
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KZCC MCCLOUD, CA 60 dBu

KSYC-FM

Fort Jones

KNYR

42-00-00N

41-30-00 N

41-00-00 N

SERVICE LOSS AREA MAP

EXHIBIT C2

MODIFY BNPH-20041223ABI

CHANGE COMMUNITY OF LICENSE

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KZCC RADIO STATION

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TRINIDAD, CALIFORNIA

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Scale 1:900,000

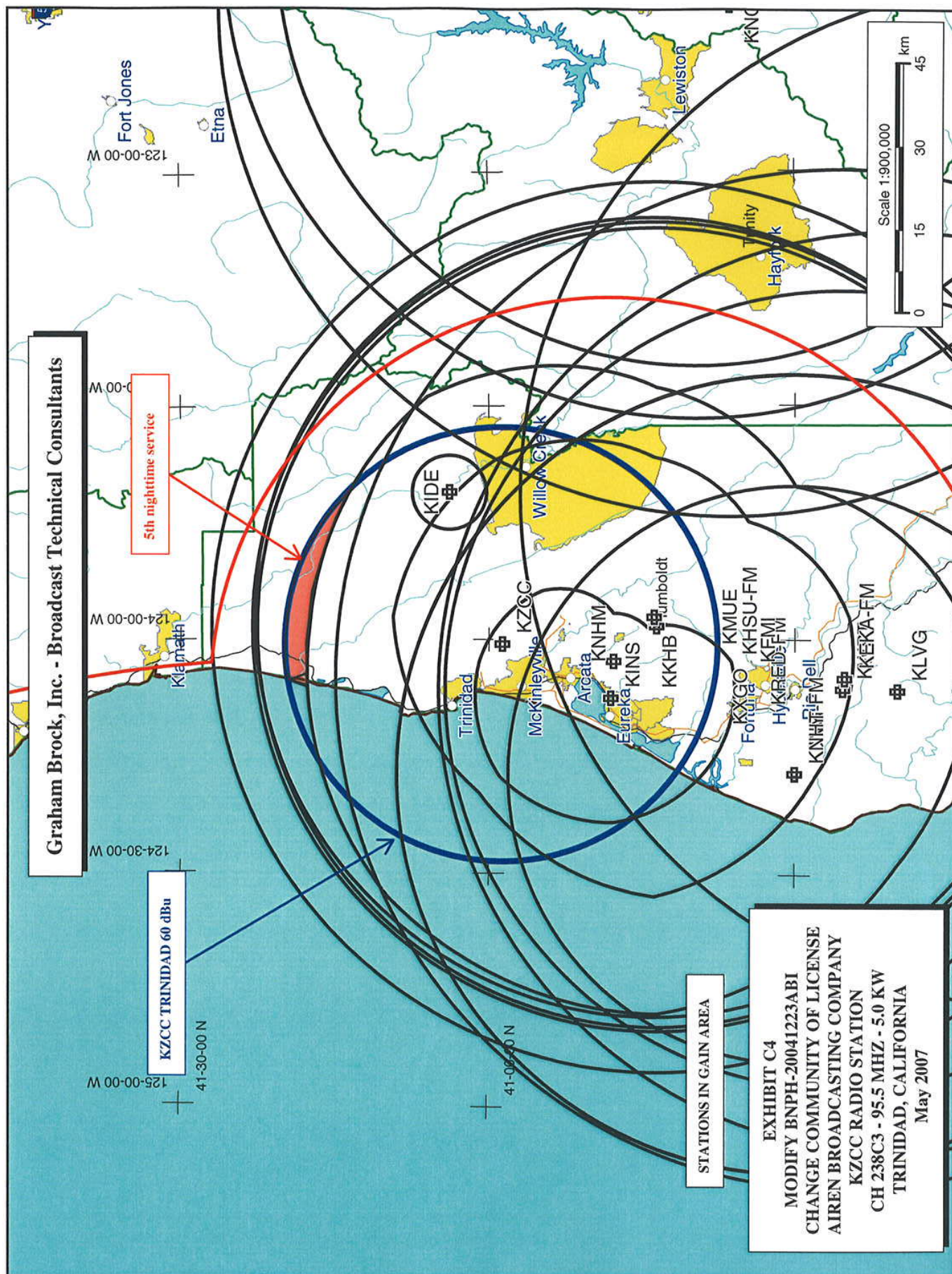
0 15 30 45 km

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EXHIBIT C3

Stations in Loss Area

<u>Call</u>	<u>Channel</u>	<u>City, State</u>
KNSQ	201C2	Mount Shasta, CA
KNCA	209C2	Burney, CA
KIBC	213C2	Burney, CA
KNYR	217C2	Yreka, CA
KKRO	218A	Redding, CA
KLAD-FM	223C	Klamath Falls, OR
KTMT-FM	229C	Medford, OR
KEWB	234C2	Anderson, CA
KKXS	241C3	Shingletown, CA
KFLS-FM	243C	Tulelake, CA
KNCQ	247C	Redding, CA
KRAT	249A	Altamont, OR
KVIP-FM	251C	Redding, CA
KNNN	257C2	Shasta Lake City, CA
KAGO-FM	258C1	Klamath Falls, OR
KZRO	261C3	Dunsmuir, CA
KWCA	266A	Weaverville, CA
KNTK	272C1	Weed, CA
KLVB	274C2	Red Bluff, CA
KYSF	275C3	Bonanza, OR
KHRD	276C2	Weaverville, CA
KLDZ	278C1	Medford, OR
KSYC-FM	280C1	Yreka, CA
KSHA	282C	Redding, CA
KFEG	284C1	Klamath Falls, OR
KRDG	287C1	Shingletown, CA
KRRX	291C	Burney, CA
KZZE	292C3	Eagle Point, OR
KKRB	295C1	Klamath Falls, OR
KESR	296C3	Shasta Lake City, CA
KIFS	298C2	Ashland, OR
LLLC	300C1	Mount Shasta, CA



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EXHIBIT C5

FM Stations in Gain Area

<u>Call</u>	<u>Channel</u>	<u>City, State</u>
KMUE	202C2	Eureka, CA
KHSU-FM	213C1	Arcata, CA
KIDE	217A	Hoopla, CA
KNHM	218A	Bayside, CA
KRED-FM	222C1	Eureka, CA
KXGO	226C	Arcata, CA
KSLG-FM	231C1	Hydesville, CA
KFMI	242C	Eureka, CA
KNCQ	247C	Redding, CA
KVIP-FM	251C	Redding, CA
KJNY	256C1	Ferndale, CA
KWPT	262C1	Fortuna, CA
KEKA-FM	268C	Eureka, CA
KLVG	279C0	Garberville, CA
KSHA	282C	Redding, CA
KHUM	284C	Garberville, CA
KKHB	288C1	Eureka, CA
KNHT	297C2	Rio Dell, CA

AM Stations in Gain Area

<u>Call</u>	<u>Frequency</u>	<u>City, State</u>
KINS	980 kHz	Eureka, CA

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Trinidad, California

Willow Creek

Trinidad

McKinleyville

Albion

KATA

KWSW

KINS

KHSU-FM

KGOE

KXGO

KKHB

Humboldt

KFMI

KMUE

KRCD-FM

KYAK

KNCR

Fortuna

Ferneale

Mykner

Mykner

123-20-00 W

123-40-00 W

124-00-00 W

124-20-00 W

124-40-00 W

125-00-00 W

41-20-00 N

41-00-00 N

Scale 1:650,000



PROTECTED SERVICES IN TRINIDAD

EXHIBIT C6

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EXHIBIT C7

FM Stations Providing Protected Service to Trinidad, California

<u>Call</u>	<u>Channel</u>	<u>City, State</u>
KSHU-FM	213C1	Arcata, CA
KRED-FM	222C1	Eureka, CA
KXGO	226C	Arcata, CA
KFMI	242C	Eureka, CA
KJNY	256C1	Ferndale, CA
KWPT	262C1	Fortuna, CA
KEKA-FM	268C	Eureka, CA

AM Stations Providing Protected Service to Trinidad, California

<u>Call</u>	<u>Frequency</u>	<u>City, State</u>
KWSW	790 kHz	Eureka, CA
KURY	910 kHz	Brookings, CA
KINS	980 kHz	Arcata, CA
KNCR	1090 kHz	Fortuna, CA
KPOD	1240 kHz	Crescent City, CA
KFVR	1310 kHz	Crescent City, CA
KATA	1340 kHz	Arcata, CA
KGOE	1480 kHz	Eureka, CA