

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

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

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

**Background**

Educational Media Foundation (EMF) is the licensee of both WUKV and WPAY-FM. 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 maintain first and second local services to New Boston, a contingent application has been simultaneously filed for WUKV (FID 65508) to change community of license from Portsmouth, OH to New Boston, OH.

EMF acknowledges the WUKV and WPAY-FM 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 when 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 WUKV remain as follows: the 70dBu contour contains 56,957 persons and 655.7 sq. km. and the 60dBu contour contains 93,432 persons and 2043 sq. km. area.
- The number of stations licensed to the current community of license of Portsmouth, OH is 5. The number of stations licensed to the proposed community of license of New Boston, OH is 2.
- The number of stations providing service to the current community of license is 13. The number of stations that provide protected service to the proposed community is 12.
- The population of the proposed community is 2,272, 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 New Boston, OH. New Boston, 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 WUKV continues to be served when the proposed move is granted, the following exhibits have been attached.

- Exhibit 25-A shows all facilities that serve any portion of the current WUKV community of license area of Portsmouth, OH. See Exhibit 25-A1 for a station list of the 11 facilities that completely cover Portsmouth and 2 facilities that partially cover Portsmouth.
- Exhibit 25-B also provides a color coded showing of the number of stations that provide service within the current licensed contour of WUKV. As can be seen the entire area is well served by 5 or more stations, not including WUKV.

#### **B. Gain/Loss**

The proposed change in the community of license of WUKV 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 WUKV. As can be seen, the current facility serves an area of 2043sq. km and a population of 93,432 persons in the 60dbu 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 WUKV 60dbu contour along with the Portsmouth, OH Urbanized Area (UA). Note that 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 WPAY-FM (Facility ID No. 54813) from New Boston, OH to Portsmouth, OH. Therefore, a grant of these two applications will maintain five local transmission services to Portsmouth, 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 WUKV and WPAY-FM.

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

FIN	Call Sign	Proposed Community of License
62328	WNXT(AM)	Portsmouth, OH
66187	WOSP	Portsmouth, OH
62329	WNXT-FM	Portsmouth, OH
88356	WZZZ	Portsmouth, OH
54813	WPAY-FM	Portsmouth, OH

Respectfully submitted,

James L Travis  
Signal Development  
Educational Media Foundation  
October 10, 2017

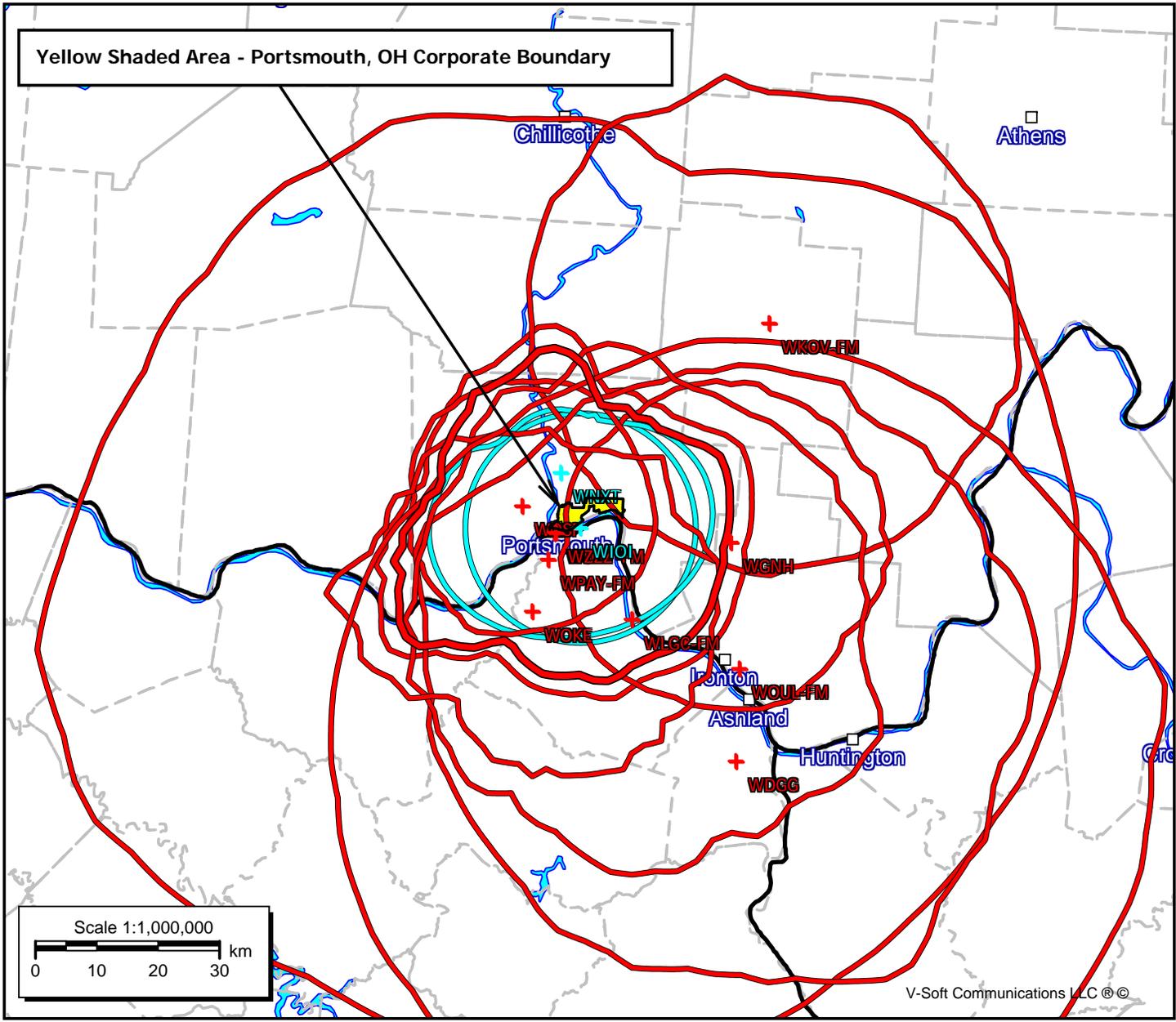
# Exhibit 25-A Number of Services Covering Portsmouth, OH

**WUKV**  
**BLED20130530ADB**  
 Latitude: 38-43-21.20 N  
 Longitude: 083-00-05.40 W  
 ERP: 1.65 kW  
 Channel: 202  
 Frequency: 88.3 MHz  
 AMSL Height: 374.0 m  
 Elevation: 338.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

Yellow Shaded Area - Portsmouth, OH Corporate Boundary

- WUKV (202)
- WDGG (229)
- WOKE (252)
- WLGC-FM (289)
- WOUL-FM (206)
- WOSP (218)
- WGNH (235)
- WKOV-FM (244)
- WNXT-FM (257)
- WPAY-FM (281)
- WZZZ (298)
- WNXT
- WIOI

FM Contours - 60dbu(F50-50)  
 AM Contours - 2mv/m Daytime



**Service Count Report – Facilities that Cover All or Part of Portsmouth, OH as seen in Exhibit 25-A**

Reference Area: PGON: Portsmouth, OH

Contours that completely cover the reference area (11):

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)  
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

Contours that partially cover the reference area (2):

WGNH (235) : FCC F(50-50) 60.00 dBu (FCC HAAT)  
WKOV-FM (244) : FCC F(50-50) 60.00 dBu (FCC HAAT)

Service Count: WUKV (202): FCC F(50-50) 60.00 dBu (FCC HAAT)

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

### Exhibit 25-B

#### WUKV

Violet Dash Line

Latitude: 38-43-21.20 N

Longitude: 083-00-05.40 W

ERP: 1.65 kW

Channel: 202

Frequency: 88.3 MHz

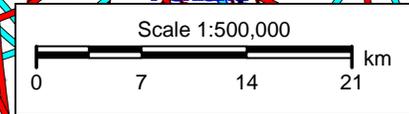
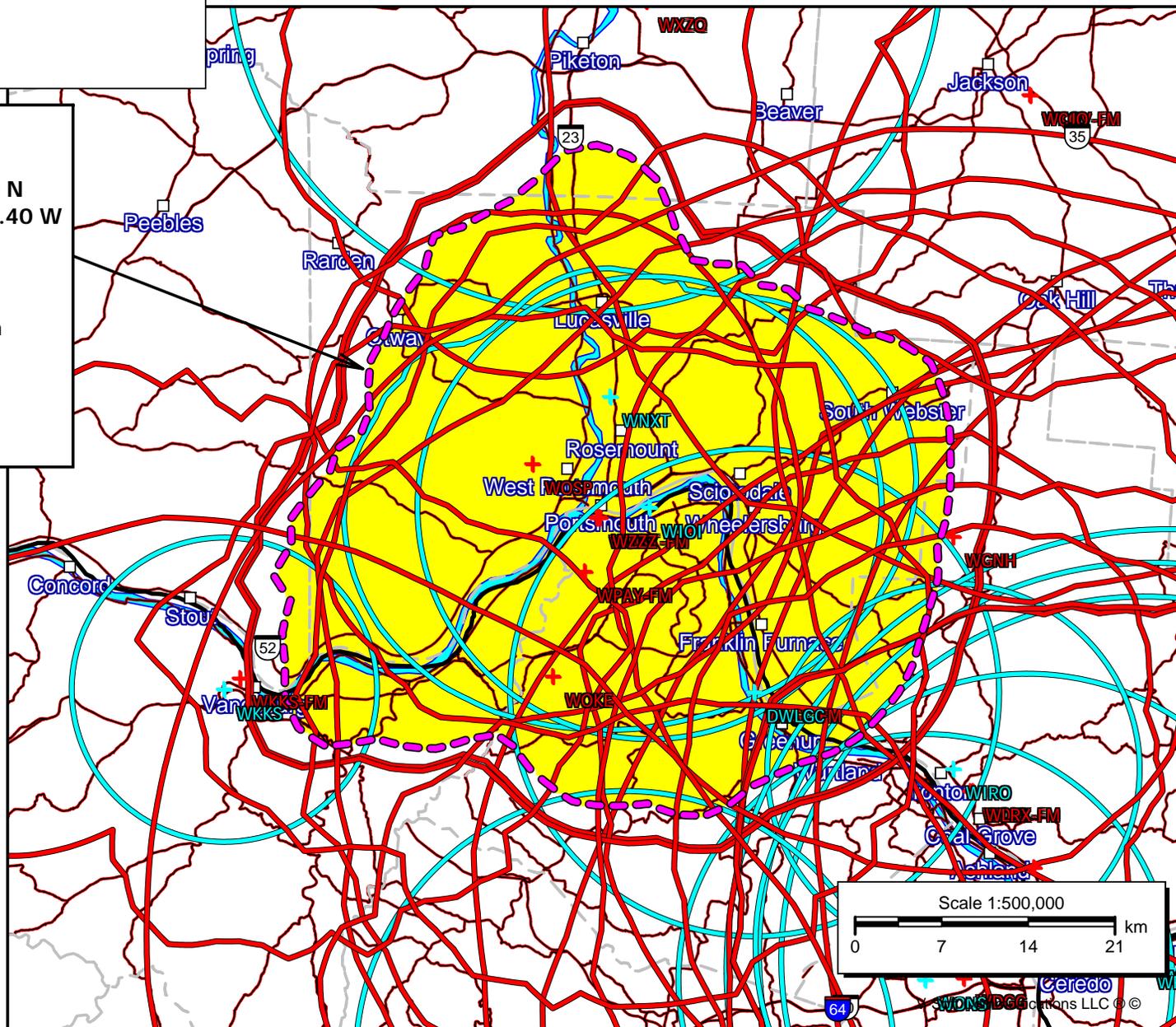
AMSL Height: 374.0 m

Elevation: 338.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: None



WDNS DGC Cerredo  
© 2015 WDNS DGC Cerredo  
© 2015 WDNS DGC Cerredo

**Population Report**

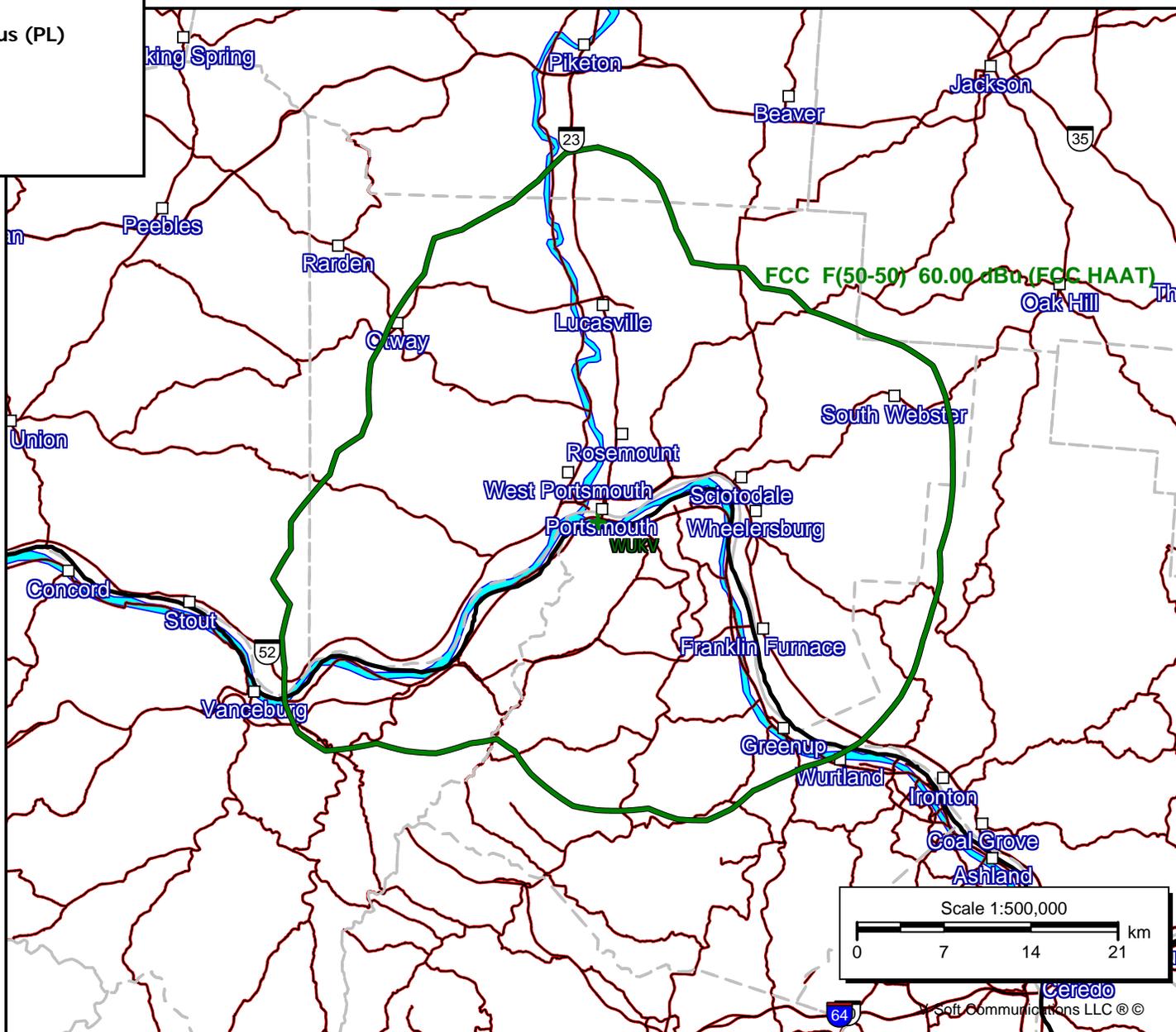
Station: WUKV (202)  
Contour: FCC F(50-50) 60.00 dBu (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 93,432  
Housing Units: 40,485  
Total Area: 2,043.0 sq. km

**Exhibit 25-C**

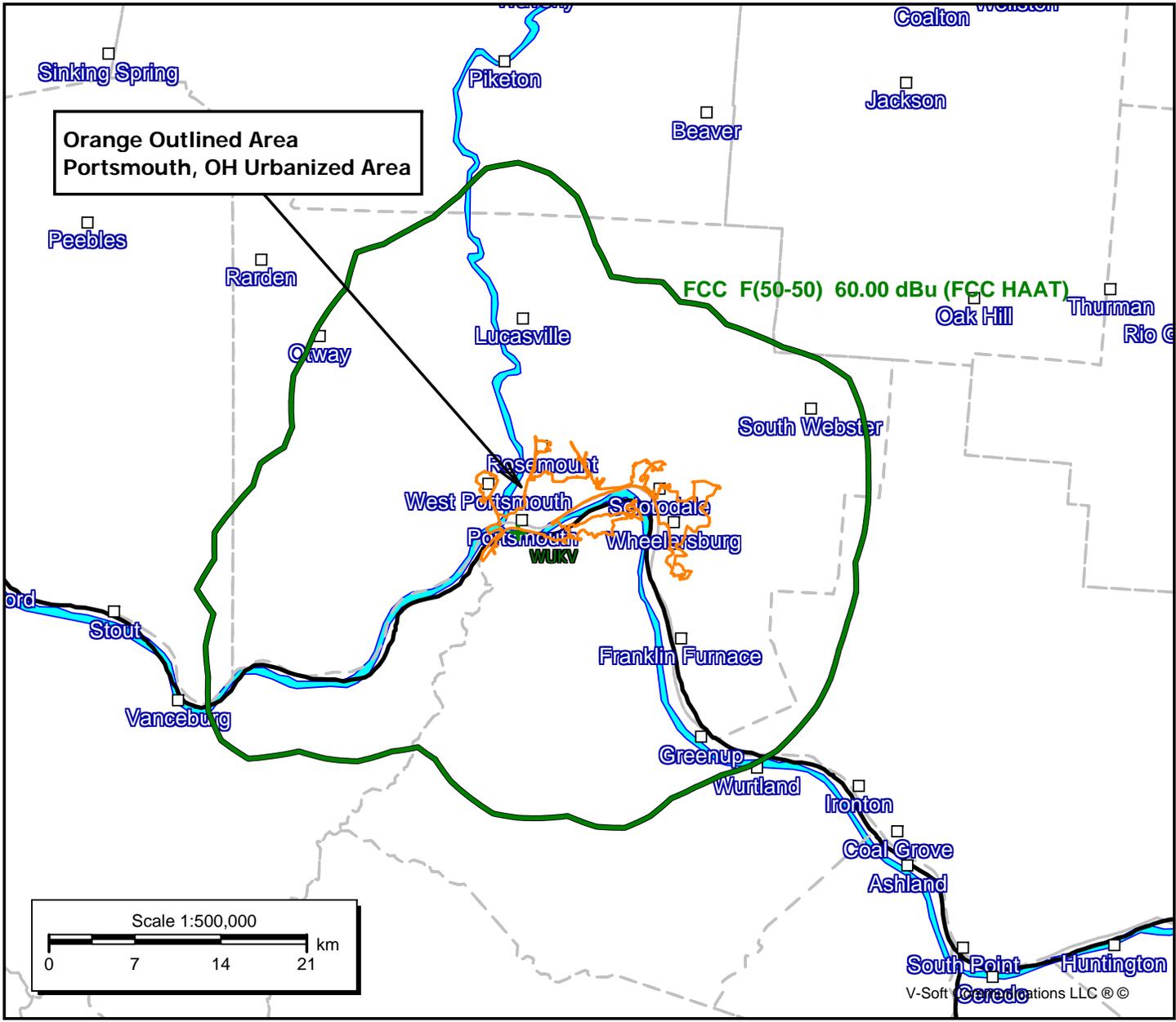
**WUKV**  
BLED20130530ADB  
Latitude: 38-43-21.20 N  
Longitude: 083-00-05.40 W  
ERP: 1.65 kW  
Channel: 202  
Frequency: 88.3 MHz  
AMSL Height: 374.0 m  
Elevation: 338.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None



# Exhibit 25-D Portsmouth, OH Urbanized Area

■ WUKV (202)

**WUKV**  
BLED20130530ADB  
Latitude: 38-43-21.20 N  
Longitude: 083-00-05.40 W  
ERP: 1.65 kW  
Channel: 202  
Frequency: 88.3 MHz  
AMSL Height: 374.0 m  
Elevation: 338.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None



### **WUKV Proposed Community of License – New Boston, Ohio**

New Boston is a *bona fide* community for allotment purposes. New Boston is a census designated place (“CDP”) with a 2010 population of 2,272. New Boston continues to maintain relevant residential, social and business characteristics. New Boston also is the community of license for radio station WIOI-AM.

New Boston has its own elected government which consists of a Mayor and Council members. New Boston also has a clerk and a service department supervisor.

New Boston does not have its own Post Office and U.S. Postal Service Zip Code but instead is served by the Portsmouth zip code (45662) and post office. New Boston does not have its own area code exchange. The area code of 740 covers the larger area including Portsmouth.

New Boston has numerous businesses and commercial establishments within its borders, as well as a number of churches. Glenwood High School is located in New Boston. Portsmouth Public Library serves New Boston with a branch location.

For more information on the City of New Boston visit <http://www.newbostonvillage.com/>