Section 307(b) Statement

   CCR-St. George IV, LLC ("CCR"), the licensee of FM broadcast station KSNN, St. George, Utah, is proposing by this application to change KSNN's community of license from St. George, Utah to Logandale, Nevada and upgrade KSNN from a Class C2 station to Class C1. Station KADD(FM) is licensed to Logandale. Therefore, Logandale is considered a community for allotment purposes.

   Both St. George, Utah and Logandale, Nevada have a first local transmission service, which is priority three under the Commission's Section 307(b) priorities; and both communities are well served with full-time aural reception service (priorities one and two under the Section 307(b) priorities).[1] Therefore, KSNN's proposed community of license change must be considered under priority four–other public interest factors.

   Logandale is not a part of any urbanized area. Therefore, a Tuck analysis is not required. CCR's proposed facilities for KSNN at Logandale will serve a significantly larger coverage area than KSNN's facilities as authorized at St. George. (See the Engineering Statement provided by Communications Technologies, Inc. included in Exhibit 32.) Nonetheless, because the city of St. George, Utah is substantially larger than the city of Logandale, the population that will be served by KSNN's proposed 70 dBu is significantly less. However, the population served by the proposed facility's 60 dBu contour will be approximately equivalent. Accordingly, CCR believes that the reallotment of KSNN from St. George to Logandale with the corresponding change in KSNN's class from C2 to C1 will provide a preferential arrangement of allotments because Logandale will have a second local transmission service and St. George will continue to be served by five transmission services–KDXU(AM), KZNU(AM), KSGU(FM), KONY(FM) and KAER(FM).[2]

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[1] *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

[2] KZHK(FM), which is currently licensed to St. George, has a construction permit to relocate to Bunkerville, Nevada.