

Radio Station WLTG-AM
Section 307(b) Showing for Community of License Change

This exhibit is offered in response to Section III-A, Item 12 (Community of License Change - Section 307(b)) of the General Instructions to FCC Form 301. To some degree, the information here was derived from the technical exhibits that accompany this application.

Should this application be granted and implemented, Radio Station WLTG-AM would provide 5.0 mV/m contour service to an area of 8.1 square miles encompassing 13,963 people.

Should the FCC approve the proposed community of license change for WLTG-AM, once the facilities are implemented and licensed it will serve as the first licensed radio station to Upper Grand Lagoon, Florida.

Upper Grand Lagoon, Florida is a census-designated place ("CDP") in Bay County, Florida. The population was 13,963 at the Year 2010 U.S. Census. Upper Grand Lagoon is part of the Panama City-Lynn Haven-Panama City Beach Metropolitan Statistical area.

According to Premier Coastal Real Estate of Florida (www.premiercoastalflorida.com) Upper Grand Lagoon has numerous marinas, docks and restaurants, and there are numerous waterfront neighborhoods and houses with boat docks there. The Navy base is also located there next to the Hathaway Bridge.

Although there are no civic, cultural, religious or social establishments in Upper Grand Lagoon, or any local government or municipal services originating within Upper Grand Lagoon, that is not a bar to a finding of community status. See, FM Channel Allotments, 67 RR 2d 610 (1990).

In *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, the Commission stated that in order to grant a change in community of license, (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities.¹ In reviewing a proposal to change a station's community of license, the Commission compares the proposed allotment plan and the existing

¹ Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990).

state of allotments for the communities involved.² To determine whether a proposal would result in a preferential arrangement of allotments, the Commission is guided by the FM allotment priorities.³ The FM priorities are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters.⁴ Co-equal weight is given to priorities (2) and (3).⁵

Reassigning WLTG-AM to Upper Grand Lagoon, Florida complies with the Commission's policies for changing a station's community of license. First, the channel study in the attached Technical Exhibit 16 demonstrates that the proposed reassignment of WLTG-AM to Upper Grand Lagoon, Florida is mutually exclusive with the current assignment of WLTG-AM at Panama City, Florida. Furthermore, after the reassignment of WLTG-FM to Upper Grand Lagoon the community of Panama City will remain well served one AM radio station and eight FM radio stations, as demonstrated in attached Technical Exhibit No. 21. Finally, reassigning – WLTG-AM to Upper Grand Lagoon would better serve the public interest under Priority (4) than maintaining existing service in Panama City.

² Id.

³ Id.

⁴ Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

⁵ Id