

MODIFY BMPH-20070306AAX
GLOBAL NEWS CONSULTANTS, LLC
KYTS RADIO STATION
CH 289C3 - 105.7 MHZ - 11.0 KW
MANDERSON, WYOMING
September 2009

EXHIBIT C

City of License Change Review

This application seeks to change the community of license of KYTS, Channel 271C2, Ten Sleep, Wyoming¹ to Manderson, Wyoming and proposes the use of Channel 289C3, which was shown in Exhibit A to be mutually exclusive with the former Channel 286C3 allocation site, using the city of license change procedures, as outlined in MB Docket 05-210, released November 29, 2006. This is a review of the proposed change, which demonstrates compliance with the Commission's rules and procedures for a change. The removal of KYTS from Ten Sleep will not deprive the community of its only potential service, since Channel 267A was allotted to Ten Sleep, in MB Docket #08-242.

As indicated in Exhibit A, Channel 289C3, at the proposed allocation site at Manderson, Wyoming, meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207, with the exception of Channel 292C1 at Shoshoni, Wyoming, which would change to Channel 293C1, as requested by GNC .

1) Since the permit for KYTS specifies Channel 271C2, it will be used for the city of license change review, rather than the former Channel 286C3 allotment at Ten Sleep.

Therefore, GNC proposes the following:

Manderson, Wyoming

Present	Proposed
None	289C3

Ten Sleep, Wyoming

Present	Proposed
267A, 271C2 (286C3)	267A

The proposed allocation/implementation site for Channel 289C3 at Manderson, Wyoming is removed from the permitted KYTS at Ten Sleep, Wyoming. Based on the relocation, the authorized 60 dBu contour of KYTS will have some area of common overlap with the 60 dBu contour of the proposed KYTS at Manderson (as shown on Exhibit C1). The authorized Channel 271C2 facility at Ten Sleep, Wyoming provides a 60 dBu contour to 7,028 persons in 8,560.3 square kilometers.² The allotment/implementation site for Channel 289C3 at Manderson, Wyoming will provide a 60 dBu contour to 9,972 persons in 4,802.9 square kilometers.³ The resultant move will create a loss of service to 5,976 persons in 6,182.0 square kilometers and a gain of service to 8,720 persons in 2,424.6 square kilometers.⁴ A map depicting the proposed service contours of KYTS at Manderson, Wyoming from the proposed implementation site is attached as Exhibit C2. The proposed KYTS facility will provide a 60 dBu service to 9,974

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- 2) All allocation comparison data is based on uniform terrain and 2000 US Census population.
 - 3) A 70 dBu contour will provide service to 2,576 persons in 1,690.9 square kilometers (assuming uniform terrain). See Exhibit A2.
 - 4) The area in common between the proposed KYTS facility at Manderson and the authorized KYTS facility at Ten Sleep contains 1,052 persons and 2,378.3 square kilometers.

persons in 4,764.6 square kilometers and a 70 dBu service to 7,726 persons in 1,683.8 square kilometers (assuming actual terrain conditions). It is noted that the community of Manderson is within the predicted 70 dBu contour of KYTS.⁵

As a result of the relocation, loss and gain areas are created. Exhibit C3 is a depiction of the authorized or potential fulltime services in the KYTS loss area. It is noted that within the loss area there are small areas of second, third, fourth and fifth service provided by the KYTS permit. An area containing 25 persons within 233.6 square kilometers would theoretically receive a second fulltime service from the KYTS permit.⁶ The KYTS permit would provide a third fulltime service to an area 82.4 square kilometers (no population); a fourth fulltime service to 193.3 square kilometers (no population) and a fifth fulltime service to 72.8 square kilometers (no population). A tabulation of the stations providing fulltime service to the loss area is attached as Exhibit C4. The theoretical loss of a second fulltime (fourth daytime) service to 25 persons should be outweighed by the first local service to the community of Manderson, Wyoming with a population of 104 persons.

Exhibit C5 is a map which depicts the authorized fulltime services in the KYTS gain area. There are no areas which would be considered either white or gray areas. Further, there are

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- 5) The proposed KYTS site is located farther than 23.2 kilometers from the center of Manderson, Wyoming. Therefore a theoretical 70 dBu contour, without consideration of terrain, falls short of reaching Manderson. However, using actual terrain conditions, the community is completely encompassed within the predicted contour. Therefore, an exception pursuant to the Woodstock, Virginia case is warranted.
 - 6) This area receives daytime coverage from AM stations KUYO, 830 kHz, Evansville, Wyoming and KTWO, 1030 kHz, Casper, Wyoming. Therefore, this area would receive a fourth daytime service from the KYTS permit and a second nighttime service from the KYTS permit.

no areas that have less than five theoretical fulltime services. A tabulation of the fulltime stations providing service to the gain area is attached as Exhibit C6.⁷

Attached as Exhibit C7 is a map showing the licensed stations which provide protected service to the community of Manderson, Wyoming.⁸ A tabulation of the stations providing protected service to Manderson is attached as Exhibit C8. Attached as Exhibit C9 is a map showing the licensed stations which provide protected service to the community of Ten Sleep, Wyoming.⁹ A tabulation of the stations providing protected service to Ten Sleep is attached as Exhibit C10.

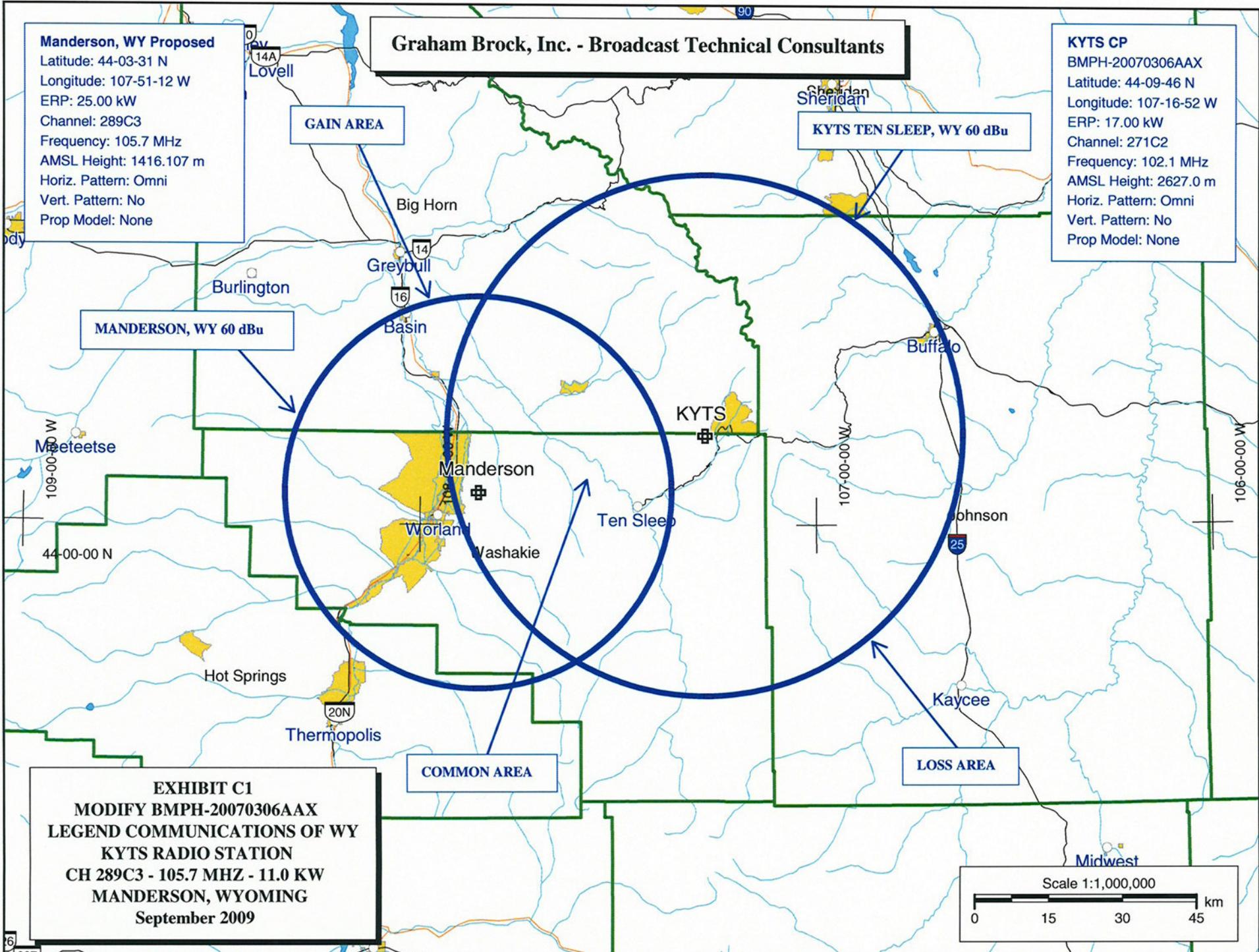
It is noted that the community of Manderson, Wyoming is not located within any Urbanized Area, as defined by the U.S. Census, 2000. Based on the foregoing, the proposed change of community of license complies with the Commission's technical rules and regulations.

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- 7) To determine services, commercial and non-commercial FM stations in the area were reviewed, as were vacant FM allotments. There were no full-time AM stations providing service to the gain or loss areas. There are however AM stations providing daytime service to the loss area. 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. Class C FM stations were considered, based on the reference contour determined by the station's licensed power and height, at either minimum Class C (83.5 kilometers) or licensed facility if greater. Any non-commercial FM station's 60 dBu reference contour was determined from its licensed facility, based on the reference distance, which was determined by power and HAAT of the facility. All FM contours assumed uniform terrain. Licensed, permitted stations were used (as was the allotment of Channel 259C at Meeteetse, Wyoming), as KYTS is a potential service. There are additional facilities serving the loss and gain areas, but they were not considered.
 - 8) As the population of Manderson is less than 2,500 persons, the 0.5 mV/m contours for AM stations was depicted.
 - 9) As the population of Ten Sleep is less than 2,500 persons, the 0.5 mV/m contours for AM stations was depicted.

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Manderson, WY Proposed
Latitude: 44-03-31 N
Longitude: 107-51-12 W
ERP: 25.00 kW
Channel: 289C3
Frequency: 105.7 MHz
AMSL Height: 1416.107 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KYTS CP
BMPH-20070306AAX
Latitude: 44-09-46 N
Longitude: 107-16-52 W
ERP: 17.00 kW
Channel: 271C2
Frequency: 102.1 MHz
AMSL Height: 2627.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None



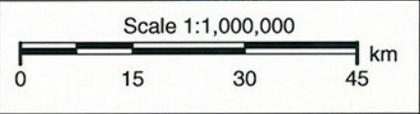
MANDERSON, WY 60 dBu

KYTS TEN SLEEP, WY 60 dBu

COMMON AREA

LOSS AREA

EXHIBIT C1
MODIFY BMPH-20070306AAX
LEGEND COMMUNICATIONS OF WY
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KYTS
Latitude: 44-03-31 N
Longitude: 107-51-12 W
ERP: 11.00 kW
Channel: 289C3
Frequency: 105.7 MHz
AMSL Height: 1466.1 m
Horiz. Pattern: Omni
Prop Model : FCC
60 dBu pop. : 9,974 (2000)
60 dBu area : 4,764.6 sq. km.
70 dBu pop. : 7,726 (2000)
70 dBu area : 1,683.8 sq. km.

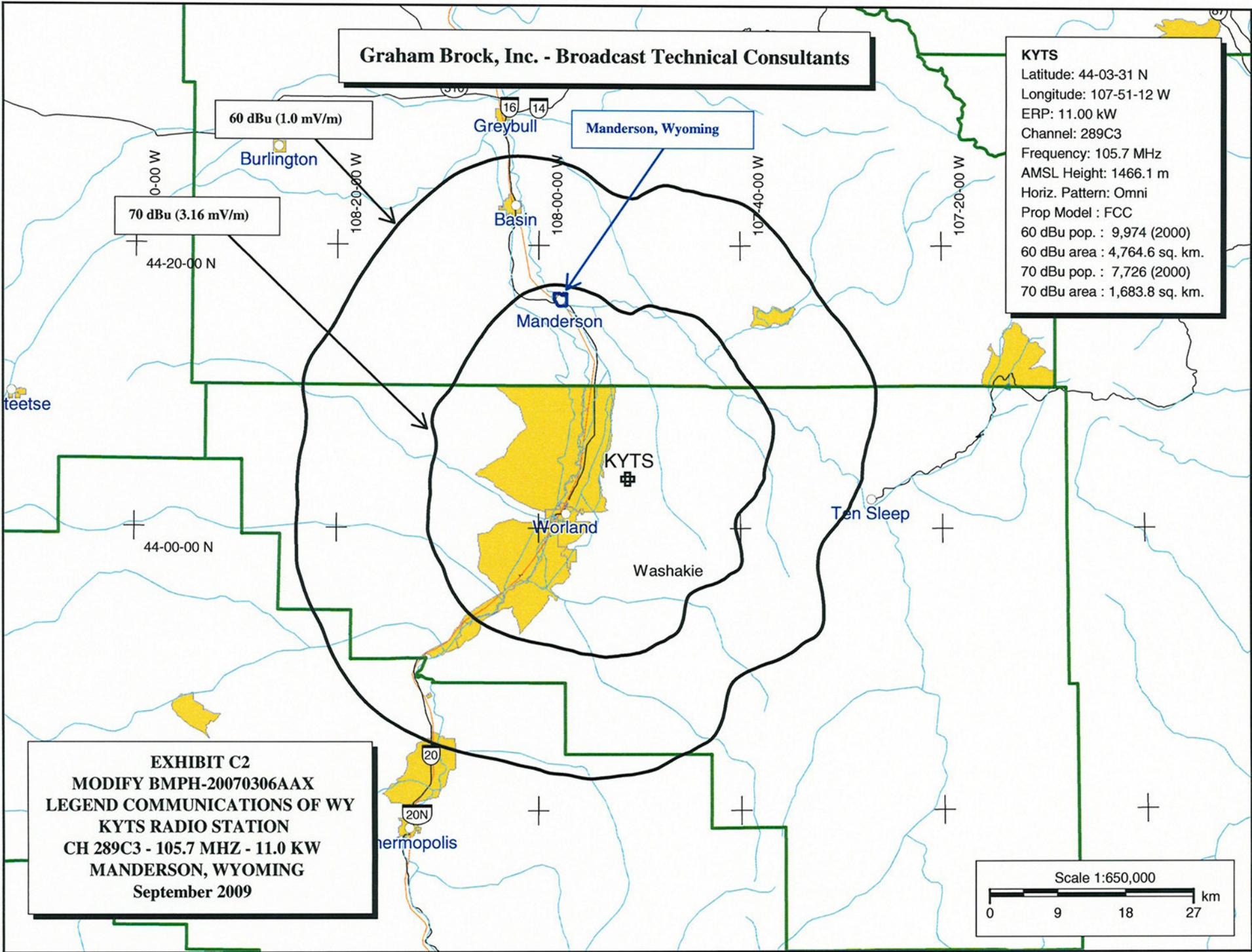


EXHIBIT C2
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KUYO (DAYTIME ONLY)

2 STATIONS

4 STATIONS

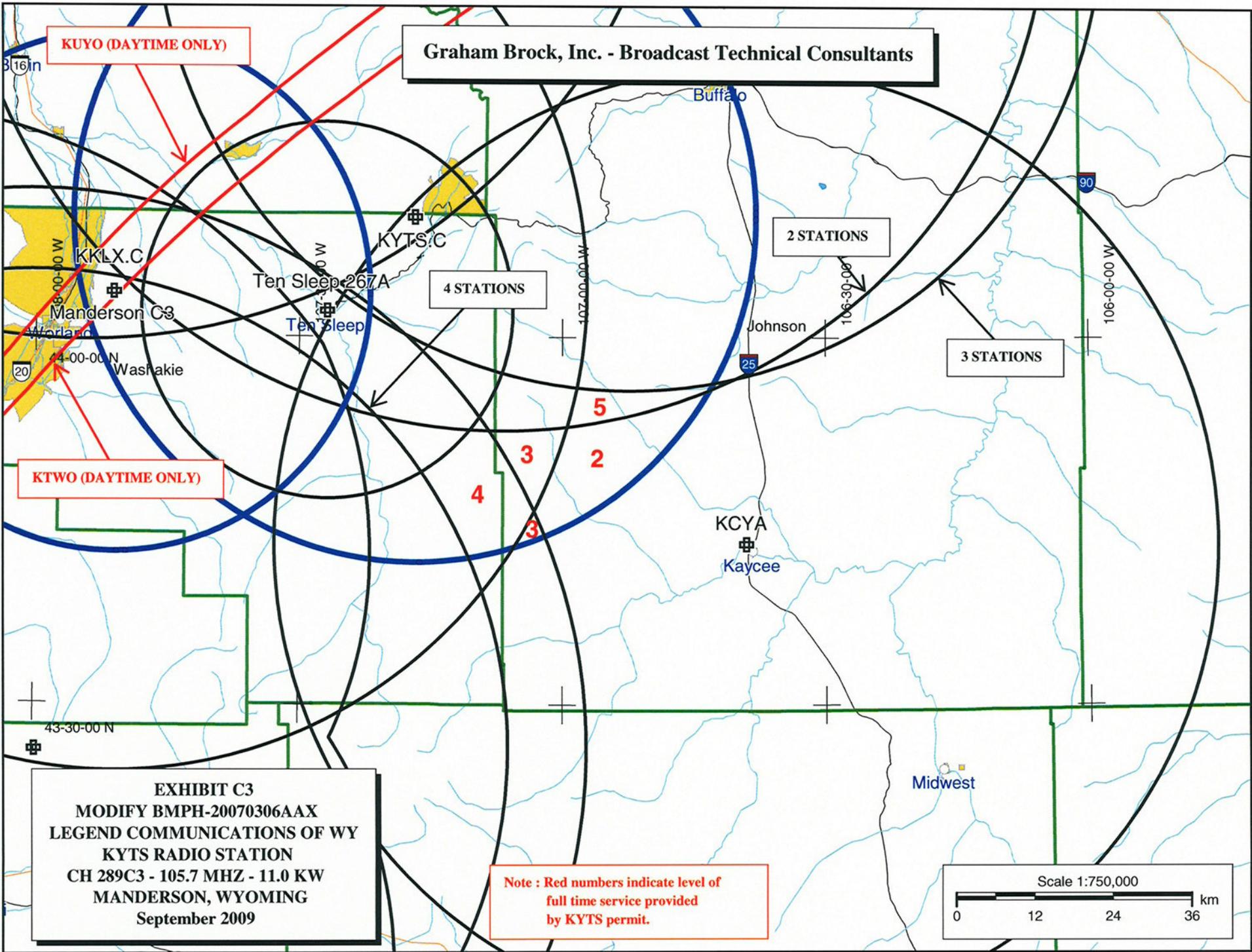
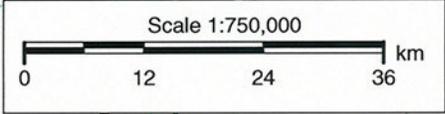
3 STATIONS

KTWO (DAYTIME ONLY)

5
2
3
4
3

EXHIBIT C3
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Note : Red numbers indicate level of full time service provided by KYTS permit.



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EXHIBIT C4

Fulltime Services in the KYTS Loss Area

FM Stations

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KCYA	249C1	Kaycee, Wyoming
KDNO	269C1	Thermopolis, Wyoming
KKLX CP	241C1	Worland, Wyoming
KLGT	225C1	Buffalo, Wyoming
KLQQ	285C0	Clearmont, Wyoming
KTWY	246C1	Shoshoni, Wyoming
KWRR	208C	Ethete, Wyoming
KWWY	292C1	Shoshoni, Wyoming
KWYW	256C	Lost Cabin, Wyoming
KXWY	275C1	Hudson, Wyoming
KYTI	229C	Sheridan, Wyoming
KZMQ-FM	262C	Greybull, Wyoming
KZWY	235C	Sheridan, Wyoming
KZZS	252C1	Story, Wyoming

AM Stations

<u>Call</u>	<u>Freq</u>	<u>City, State</u>
KTWO	1030 kHz	Casper, Wyoming
KUYO	830 kHz	Evansville, Wyoming

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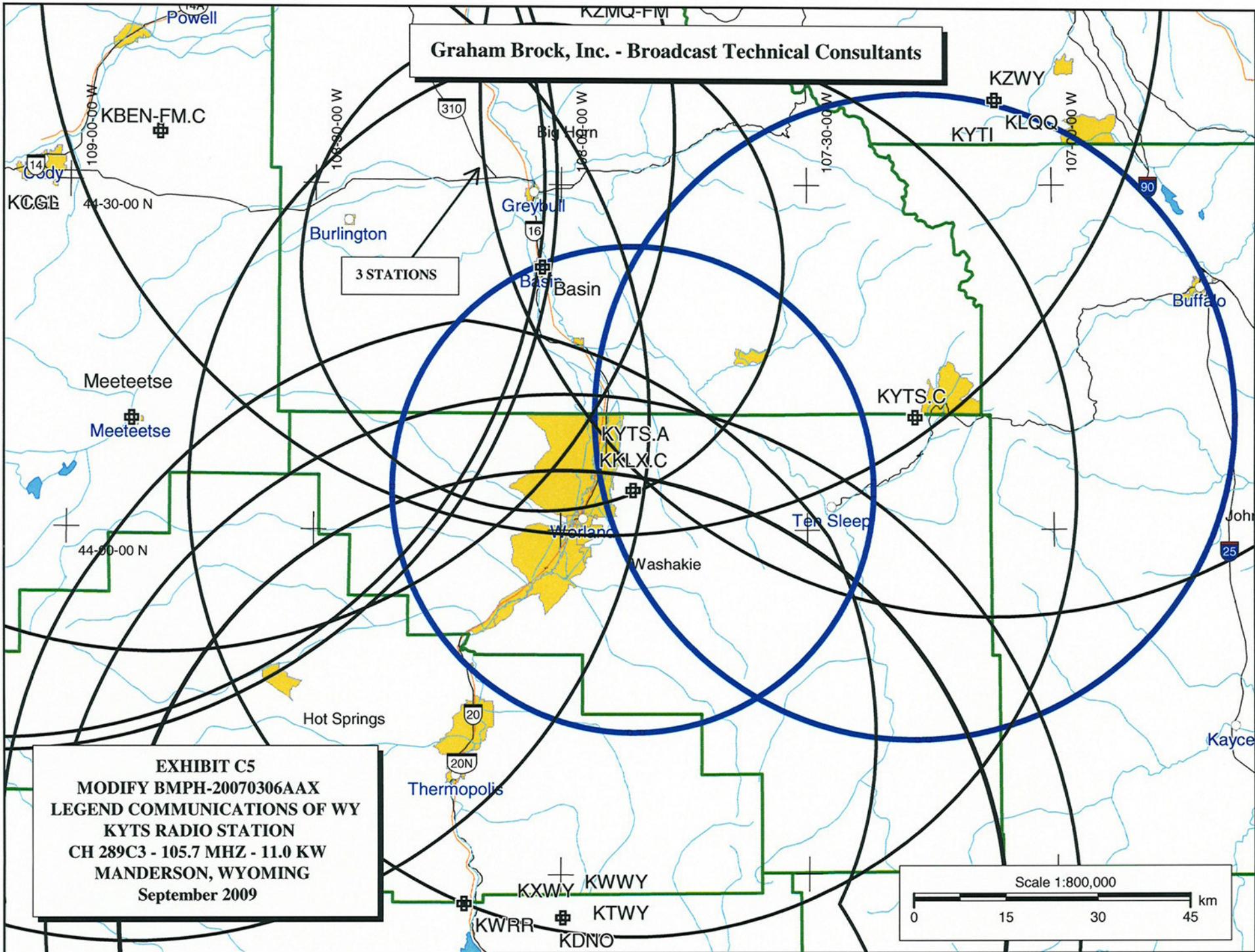
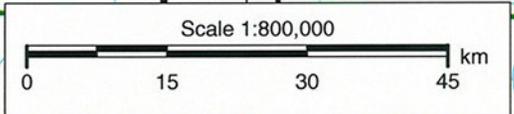


EXHIBIT C5
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EXHIBIT C6

Fulltime Services in Gain Area

FM Stations

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KBEN-FM CP	277C0	Cowley, Wyoming
KCGL	281C	Powell, Wyoming
KDNO	269C1	Thermopolis, Wyoming
KKLX CP	241C1	Worland, Wyoming
KLQQ	285C0	Clearmont, Wyoming
KTAG	250C	Cody, Wyoming
KTWY	246C1	Shoshoni, Wyoming
KWRR	208C	Ethete, Wyoming
KWWY	292C1	Shoshoni, Wyoming
KWYW	256C	Lost Cabin, Wyoming
KXWY	275C1	Hudson, Wyoming
KYTI	229C	Sheridan, Wyoming
KZMQ-FM	262C	Greybull, Wyoming
KZWY	235C	Sheridan, Wyoming
Vacant Allotment	259C	Meeteetse, Wyoming
Vacant Allotment	300C3	Basin, Wyoming

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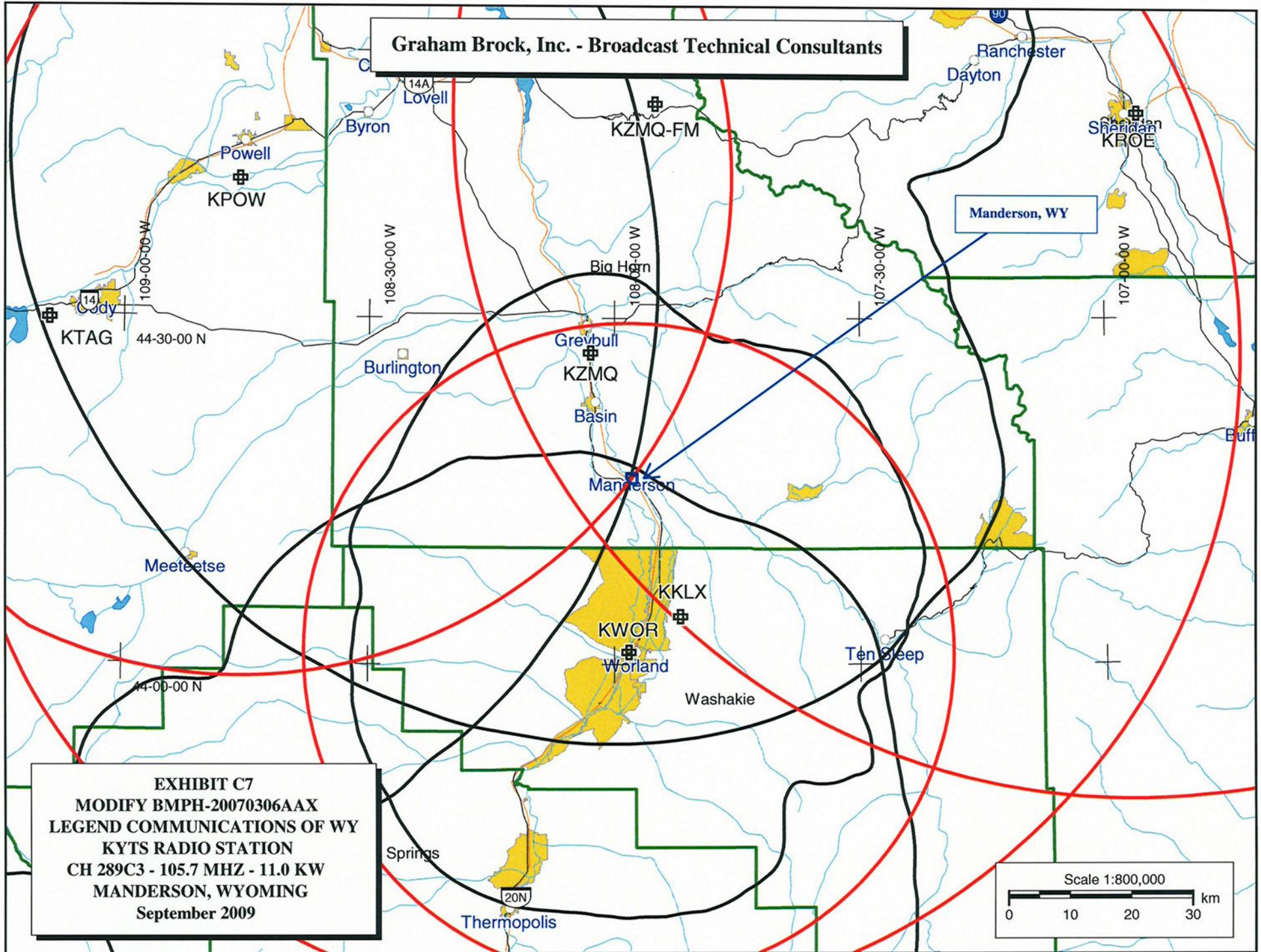
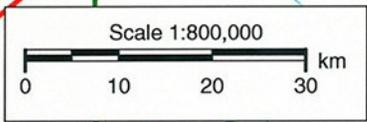


EXHIBIT C7
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EXHIBIT C8

Stations Providing Protected Service to Manderson, Wyoming

FM Stations

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KKLX	241C2	Worland, Wyoming
* KTAG	250C	Cody, Wyoming
KWRR	208C	Ethete, Wyoming
KZMQ-FM	262C	Greybull, Wyoming

AM Stations

<u>Call</u>	<u>Freq</u>	<u>City, State</u>
* KPOW	1260 kHz	Powell, Wyoming
KROE	930 kHz	Sheridan, Wyoming
KWOR	1340 kHz	Worland, Wyoming
KZMQ	1140 kHz	Greybull, Wyoming

* Provides partial coverage to Manderson.

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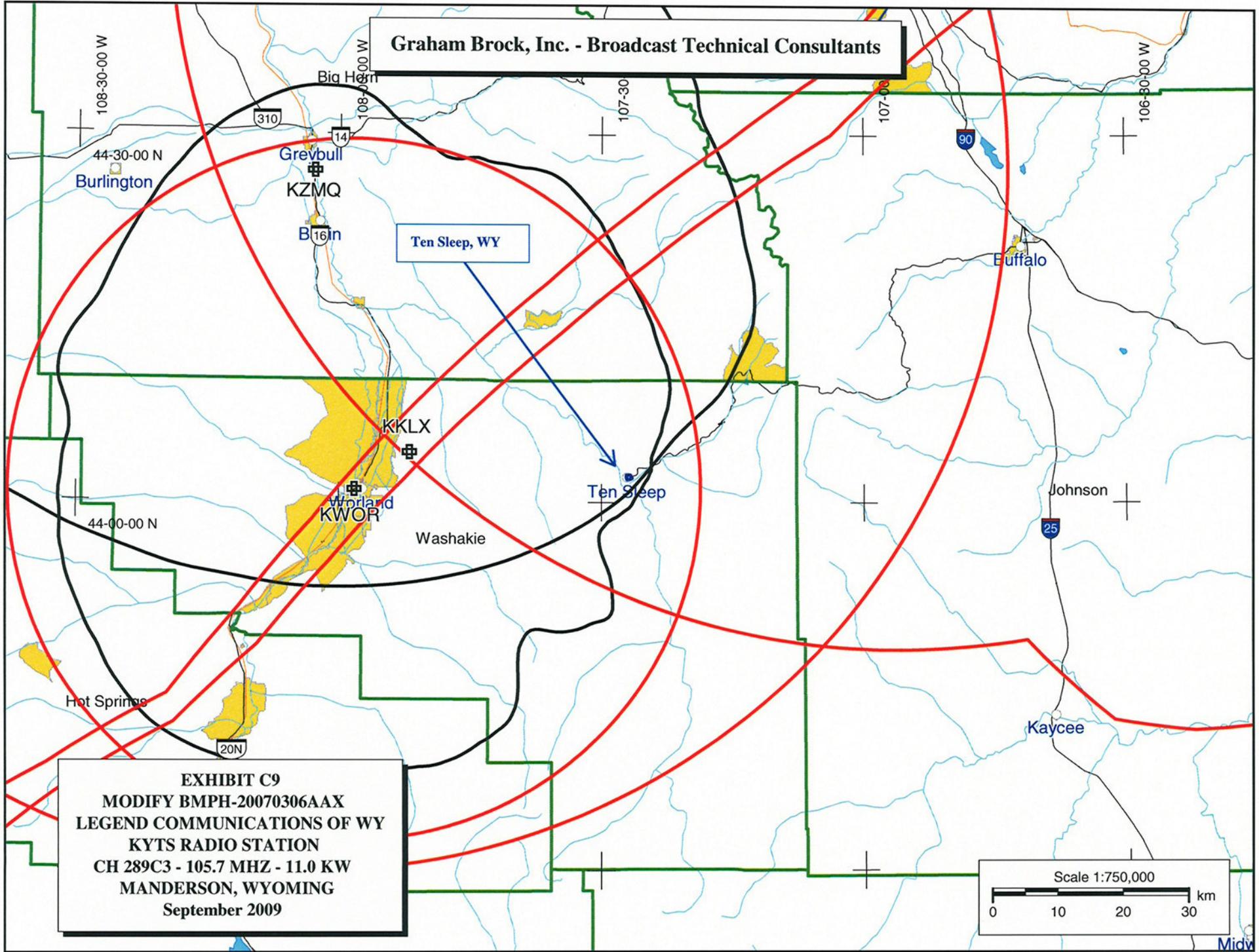
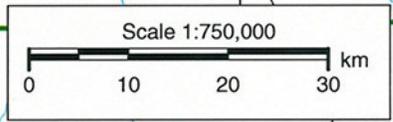


EXHIBIT C9
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EXHIBIT C10

Stations Providing Protected Service to Ten Sleep, Wyoming

FM Stations

<u>Call</u>	<u>Ch/Class</u>	<u>City, State</u>
KKLX	241C2	Worland, Wyoming
KZMQ-FM	262C	Greybull, Wyoming

AM Stations

<u>Call</u>	<u>Freq</u>	<u>City, State</u>
KROE	930 kHz	Sheridan, Wyoming
KTWO	1030 kHz	Casper, Wyoming
KUYO	830 kHz	Evansville, Wyoming
KWOR	1340 kHz	Worland, Wyoming
KZMQ	1140 kHz	Greybull, Wyoming