

### **307(b) NARRATIVE (CAMMACK VILLAGE, ARKANSAS)**

As reflected in the subject FCC Form 301 application, Flinn Broadcasting Corporation (hereinafter “FBC”) is herein requesting a change in the community of license for KWBF-FM, North Little Rock, Arkansas (i.e., from North Little Rock, Arkansas to Cammack Village, Arkansas). The subject narrative will demonstrate that Cammack Village, Arkansas (a Census Designated Place) is “a community suitable for allotment purposes” and that the proposed change in the community of license represents a net service benefit under the Section 307(b) priorities and the Commission’s rules and policies generally.

### **Proposed Channel 266A (Cammack Village, Arkansas)**

In reviewing the subject FCC Form 301 application, the Commission must consider whether the proposal would serve one or more of the Commission's four allotment priorities.<sup>1</sup> Flinn proposes, via this minor-change application, to re-allot Channel 266A from North Little Rock, Arkansas to Cammack Village, Arkansas. The Cammack Village, Arkansas proposal is mutually-exclusive with the current North Little Rock, Arkansas allotment.

The following points are relevant to the determination that the proposed change in community of license to Cammack Village, Arkansas is in the public interest:

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<sup>1</sup> See ***Parker & Port St. Joe R&O***, 11 FCC Rcd 1095, 1095 (Para. 4) (1996). The four allotment priorities are: (i) one full-time aural reception service to a community; (ii) a second full-time aural reception service to a community; (iii) one local transmission service to a community; or (iv) other public interest factors. (Note: The second and third criteria have equal priority).

- ❑ As noted in the enclosed engineering statement, North Little Rock, Arkansas has a 2000 U.S. Census population of 60,433 persons. North Little Rock has one other local service, KDXE (AM) (a Class B, fulltime station). Cammack Village has a U.S. Census population of 831 persons and has no local FM or AM service. Thus, the proposal will result in a first local aural transmission service to the community of Cammack Village.
- ❑ Cammack Village, Arkansas is census designated place (CDP).
- ❑ The proposed community of license change involves two communities located within the Little Rock Urbanized area. Specifically, the current (licensed) predicted 60 dBu coverage contour encompasses 86% of the population and 81% of the area within the Little Rock Urbanized area. Conversely, the proposed KWBF-FM 60 dBu contour will encompass 83% of the population and 77% of the area within the Little Rock Urbanized area. As noted in the attached engineering statement, it has been calculated that 99% of the population and 58% of the area of the community of North Little Rock is within the Little Rock Urbanized area. All (100%) of Cammack Village is within the Little Rock Urbanized area.
- ❑ The KWBF-FM loss area contains 61,200 persons and 870 square kilometers of land area (i.e., versus the the KWBF-FM gain area of 40,300 persons and 690 square kilometers of land area). Despite this slight net loss, both the gain and loss areas are well served (i.e., have at least 5 aural services to all portions).

In sum, it is respectfully submitted that the proposed community of license change represents a net service benefit under the Section 307(b) priorities. Specifically, under Priority (iii), Cammack Village, Arkansas will receive a first local service (without depriving North Little Rock, Arkansas of its remaining broadcast service, KDXE). In addition, both the gain and loss areas are well served inasmuch as at least 5 aural services (i.e., not including the subject station, KWBF-FM) cover same.

### **No “Tuck” Showing Required**

As noted hereinabove, the proposed community of license change involves two communities located within the Little Rock Urbanized area. Since no move from a community outside of an urbanized area to a community within an urbanized area is

contemplated, no “Tuck” showing is required in connection with the subject application.

**See, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast**

**Stations (Mount Pleasant and Hemlock, Michigan), DA 05-2901 (November, 4,**

**2005) (“a Tuck showing is required if a station is moving from a community located**

**outside of an urbanized area to another community located within an Urbanized Area”);**

**Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations**

**(Gonzales, Houma, and Westwego, Louisiana and Hattiesburg, Mississippi), 17**

**FCC Rcd 18113 67 FR 64080 (DA 02-2319) (September 27, 2002).**

### **Cammack Village, Arkansas is a Community**

As the Commission noted in its **Notice of Proposed Rulemaking**

**(“Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations**

**[Willows and Dunnigan, California]”), 9 FCC Rcd 1802, 1994 FCC Lexis 1475:**

Communities are defined by the Commission as geographically identifiable population groupings. As a general rule, if a community is incorporated or is listed in the U.S. Census, that is sufficient to demonstrate its status as a community for allotment purposes.

Cammack Village, Arkansas is census designated place (CDP) and, as such, is presumed to be a community for allotment purposes. Notwithstanding this presumption, other objective facts support a conclusion that Cammack Village, Arkansas is a community. Cammack Village, Arkansas was established in 1943 and has:

- ☐ Its own zip code (i.e., 72207).
- ☐ The following elected officials: A Mayor, three City Council members, a Treasurer, a City Attorney and a Recorder.
- ☐ Its own fire department.
- ☐ Its own police department (with both full and part-time officers).
- ☐ A City Hall and Police Station.
- ☐ Its own fiscal budgeting process.
- ☐ Its own newsletter (i.e., "The Cammack Periodical").
- ☐ A community website (i.e., [www.cammack.net](http://www.cammack.net)).
- ☐ A wide variety of available (owned and leased) real estate.
- ☐ Its own trash collection and recycling service.
- ☐ A variety of businesses, including: Knapp and Craig (accountants); Bob Callans and Associates (architects); Dean's Hair Fashions; Cleland and Association Insurance; Beaver Pond Hunting Club; Byron Freeland, Esq.; Marlene's Coiffures; Balancing Act; Diet Center of Pea Ridge; Rhoads Service; Knot at Work Jewelry; Mike Lewis Insurance; Tallulah; and, Country Cones.
- ☐ A community park (i.e., Baker Park).
- ☐ A community pool (i.e., the Cammack Village Pool).

## **Conclusion**

As may be noted above, grant of the subject FCC Form 301 application will provide substantial technical and public interest benefits. Cammack Village, Arkansas will receive a first local service (without depriving North Little Rock, Arkansas of its remaining broadcast service, KDXE). Cammack Village, Arkansas is a census designated place and, as such, under Commission precedent, is presumed to be a community for allotment purposes. Notwithstanding that fact, Cammack Village is in reality an established, vibrant community (and has been since the early 1900's). As demonstrated herein, Cammack Village has gone to great lengths to establish itself as a community with a distinct identity. Local Cammack Village businesses are proud of their connection to the community. A new FM broadcast service, with its local Cammack Village identity, will be a perfect addition to the existing community tapestry.

Cammack Village, Arkansas (a census designated place) is “a community suitable for allotment purposes”. The proposed community of license change (from North Little Rock to Cammack Village) represents a net service benefit under the Commission’s Section 307(b) priorities and its rules and policies generally. It is respectfully submitted that the public interest benefits highlighted herein support grant of the subject FCC Form 301 application.