

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

This statement is included to show that the proposed move to the station KVLZ will comply with the 307(b) fair distribution guidelines.

Discussion

In the instructions for the new Form 301, the FCC describes several points that are required for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b). Those requirements have been divided into the two sections below:

1. Minimum Requirements

The commission has requested that any 307(b) showing contain the following minimum information:

- Since new technical facilities are proposed, the population and area for the new facility are as follows: the 70 dBu contour will contain 52,564 persons and 75.23 sq. km. and the 60 dBu contour will contain 126,478 persons and 238.69 sq. km. area.
- The number of stations licensed to the proposed community of Rochester Hills is 0.
- The number of stations that provide protected service to the proposed community is approximately 34.
- The population of the proposed community is 68,825, according to the 2000 U.S. Census data.
- Rochester Hills, Michigan is an established and licensable community as shown by the fact that it presently has FM translator station W288BK licensed to it.

2. Other Relevant Information**A. Service Area**

In order to show that the entire area that would be served by the authorized facility of KVLZ continues to be served when the proposed move is granted, several exhibits have been attached.

- Exhibit 23-A shows all facilities that serve any portion of the current KVLZ facility's coverage area.
- Exhibit 23-B is similar to Exhibit 23-A, however in order to make abundantly clear that the area is well served, contours that combine to provide at least 5 services have been colored green.
- Exhibit 23-C is a map with the extraneous contours removed and a color coded showing of the number of stations that provide service within the current authorized contour of KVLZ. As can be seen the entire area is served

by 5 or more stations, not including KVLZ.

- Exhibit 23-D is a population report that corresponds to the map at Exhibit 23-C. This further shows that 100% of the area and population that are within the current authorized contour of KVLZ continue to be well served, should the proposed move be granted.

B. Gain/Loss

The proposed move to KVLZ will make more efficient use of the FM spectrum and increase service to the public, as it will result in a vast increase in population served as illustrated by the exhibits below:

- Exhibit 23-E is a population report of the originally licensed facility for KVLZ. As can be seen, the current facility serves an area of 297.63 sq. km and a population of 19,005 persons.
- Exhibit 23-F is a population report of the proposed facility. As can be seen, the proposed facility serves an area of 238.69 sq. km and a population of 126,478 persons.

Therefore, even though there is an overall loss of 19.80% (58.94 sq. km) of the area served, there is an overall gain of 565.50% (107,473 persons) to the population served.

C. Number of Aural Services

The proposed move to KVLZ will result in preferential arrangement of facilities. This facility will provide Rochester Hills, MI with its first local aural transmission. The former community of license, Sheridan, WY, continues to be served by the following facilities:

FIN	Call Sign	Community of License
89342	KOHR	Sheridan, WY
89885	KPRQ	Sheridan, WY
38626	KROE	Sheridan, WY
82438	KSUW	Sheridan, WY
90842	KWCF	Sheridan, WY
12942	KWYO	Sheridan, WY
12931	KYTI	Sheridan, WY
38627	KZWY	Sheridan, WY

Conclusion

The entire area within the current licensed contour of KVLZ continues to be served should the proposed facility be granted. Further it is in the public interest to grant the proposed facility since it will result in both a great increase in population served and

a first service to Rochester Hills, MI.

Respectfully submitted,

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Exhibit 23-A

KVLZ.C
Latitude: 44-47-54 N
Longitude: 106-55-51 W
ERP: 0.50 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 1218.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

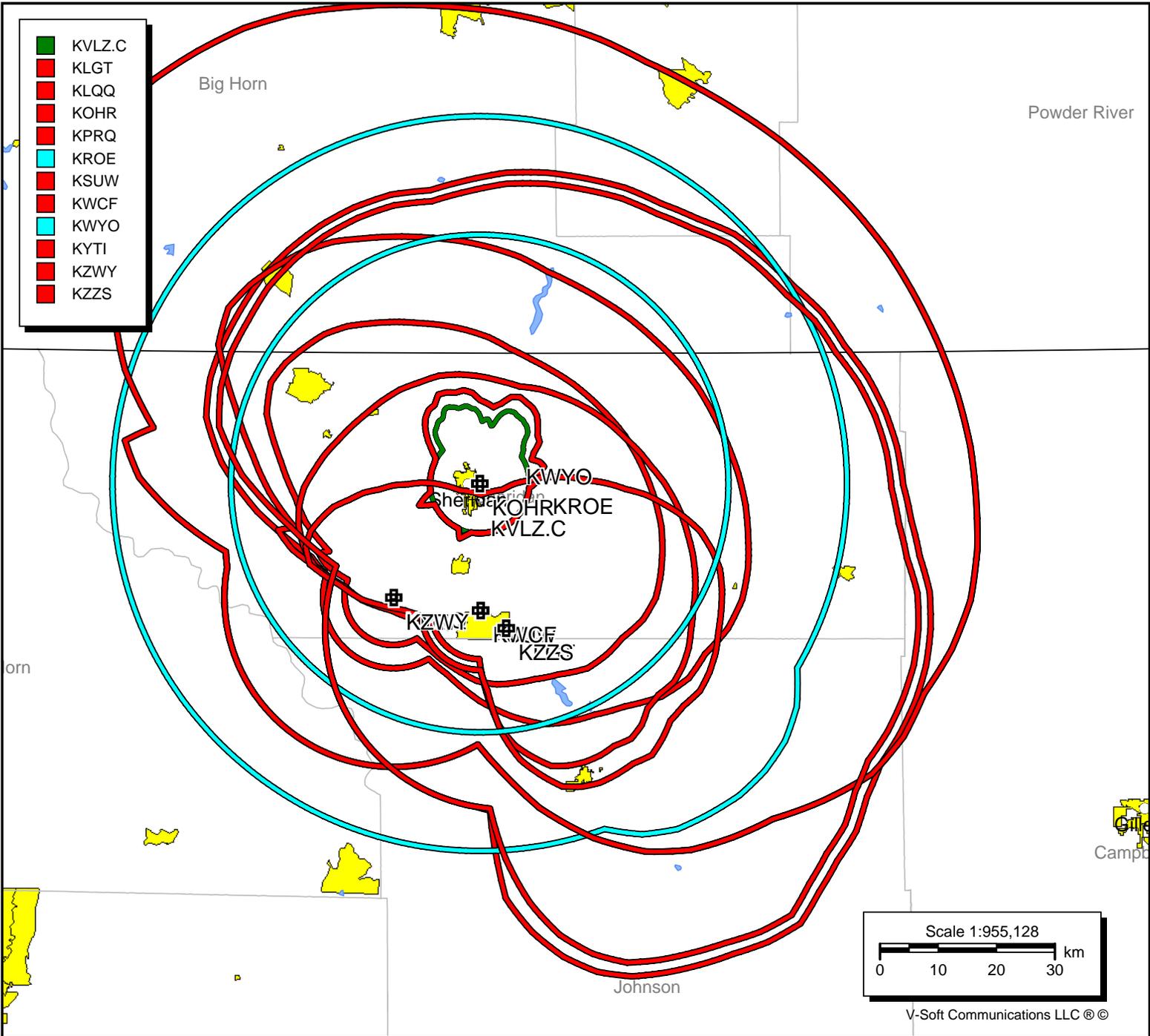




Exhibit 23-B

KVLZ.C
Latitude: 44-47-54 N
Longitude: 106-55-51 W
ERP: 0.50 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 1218.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

- KVLZ.C
- KLGT
- KLQQ
- KOHR
- KPRQ
- KROE
- KSUW
- KWCF
- KWYO
- KYTI
- KZWY
- KZZS

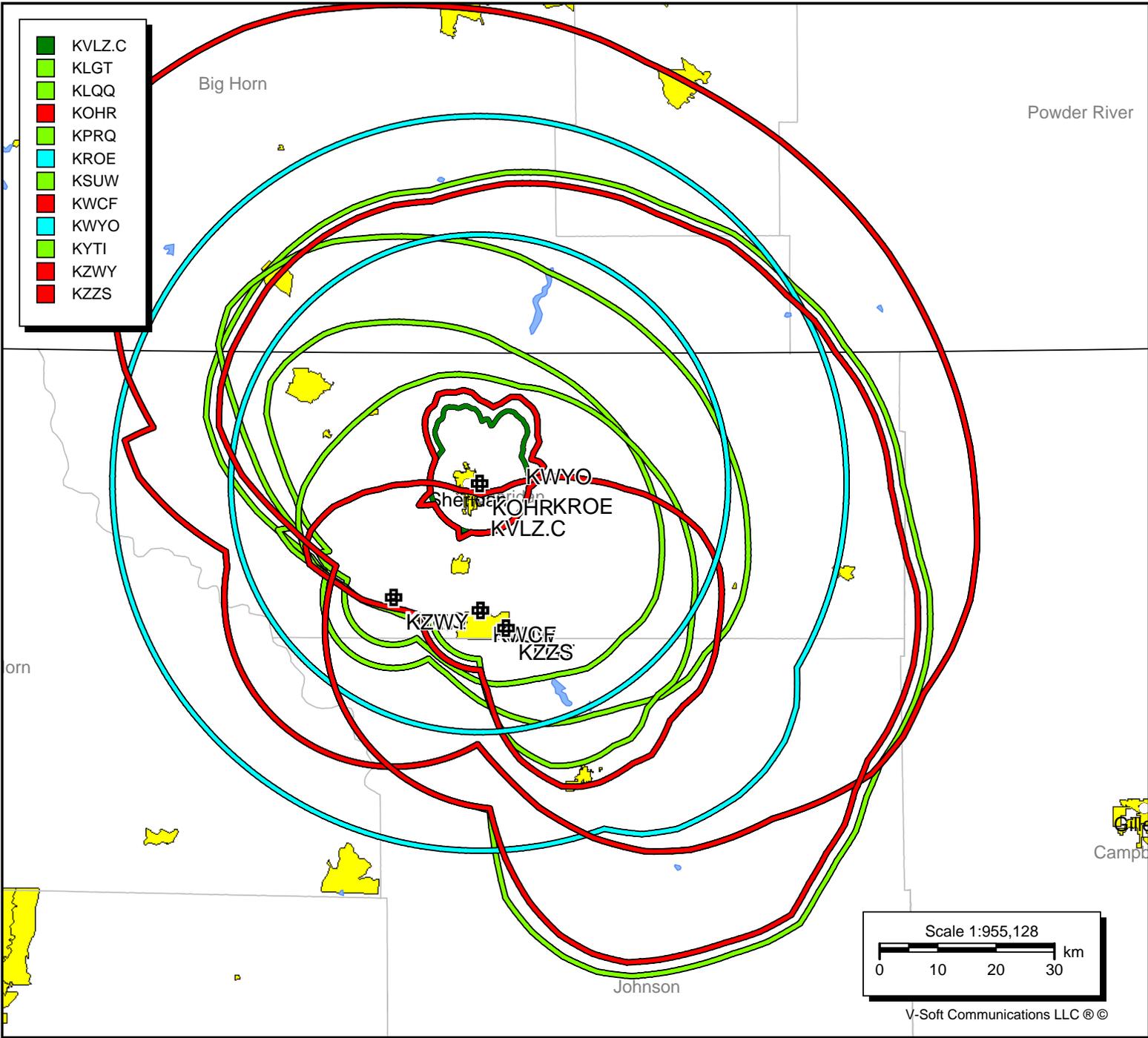




Exhibit 23-C

KVLZ.C
Latitude: 44-47-54 N
Longitude: 106-55-51 W
ERP: 0.50 kW
Channel: 210
Frequency: 89.9 MHz
AMSL Height: 1218.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Service Count

- 1st Service
- 2nd Service
- 3rd Service
- 4th Service
- 5th service

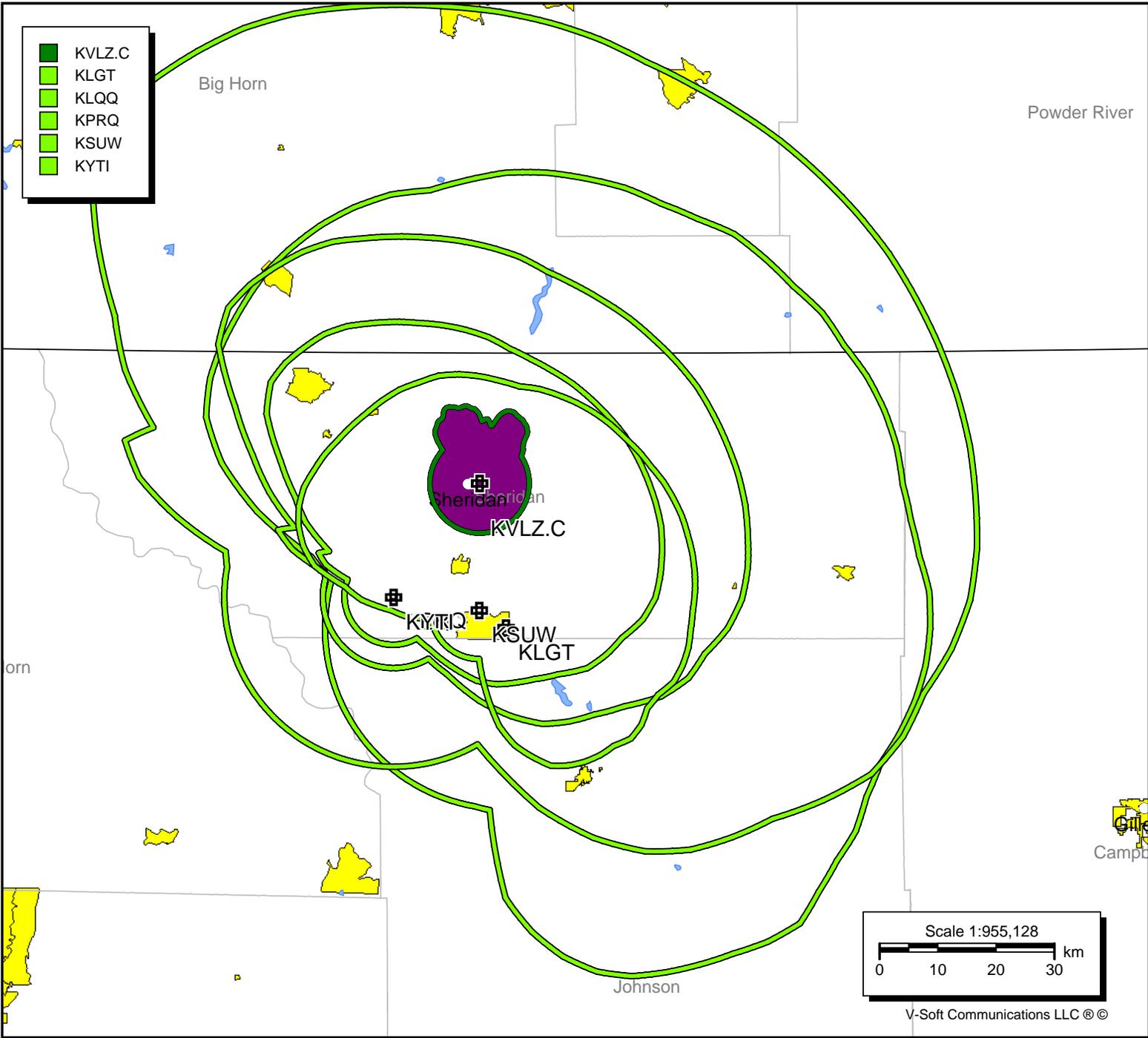


Exhibit 23-D

Service Count Population Report

Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
5th Service (or >)	19,005	19,005	100.0

Exhibit 23-E

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-50) FS: 60.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KVLZ.C

File Number: BPED19980810MD

Latitude: 44-47-54 N

Longitude: 106-55-51 W

ERP: 0.50 kW

Channel: 210

Frequency: 89.9 MHz

AMSL Height: 1218.0 m

Elevation: 1177.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 19,005

Total Housing Units Within Contour: 8,639

Total Area Within Contour: 297.63 sq. km

	Housing Units	Population
Wyoming		
Sheridan County		
KVLZ.C	8,639	19,005

Exhibit 23-F

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-50) FS: 60.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: NEW

Latitude: 42-40-43 N

Longitude: 083-07-28 W

ERP: 1.20 kW

Channel: 212

Frequency: 90.3 MHz

AMSL Height: 296.0 m

Elevation: 232.08 m

Horiz. Antenna Pattern: Directional

Vert. Elevation Pattern: No

Total Population Within Contour: 126,478

Total Housing Units Within Contour: 50,573

Total Area Within Contour: 238.69 sq. km

	Housing Units	Population
Michigan		
Macomb County		
NEW	22,523	57,092
Oakland County		
NEW	28,050	69,386