

**Goldman Engineering Management
Dallas, Texas.**

FCC 301 Application, Exhibit 28
WV KO-FM, Channel 276A Johnstown OH.
Narrative and Allocation Study

WV KO-FM is presently licensed for operation as a 3 kilowatt Class A station at coordinates N40-13-44, W82-39-32 (BLH19900227KF). The licensee recently participated in the Ohio Association of Broadcaster's voluntary inspection program. As part of that inspection it was determined that the tower coordinates for this station were not as described in the station's license. WV KO-FM has not moved its tower nor constructed a new tower. Therefore, to the best of the licensee's knowledge, the incorrect coordinates resulted from slight calculation errors in a prior licensee's form 302 (see FCC file BPH-890424IE). As this variance is slightly over the 3 seconds latitude and/or longitude allowed in §73.1690(b)(2) without filing an FCC form 301 (3.8 seconds longitude), this 301 form is being prepared in support of correcting the licensed coordinates. An FAA 7460-1 has been submitted for a new FAA Aeronautical Study Number and as soon as a new study number has been issued, the licensee will modify ASR number 1247012.

Licensed LAT	40°	13'	44.0"		Licensed LONG	82°	39'	32.0"
Surveyed LAT	40°	13'	44.0"		Surveyed LONG	82°	39'	35.8"

*coordinates all NAD27

WV KO Allocation

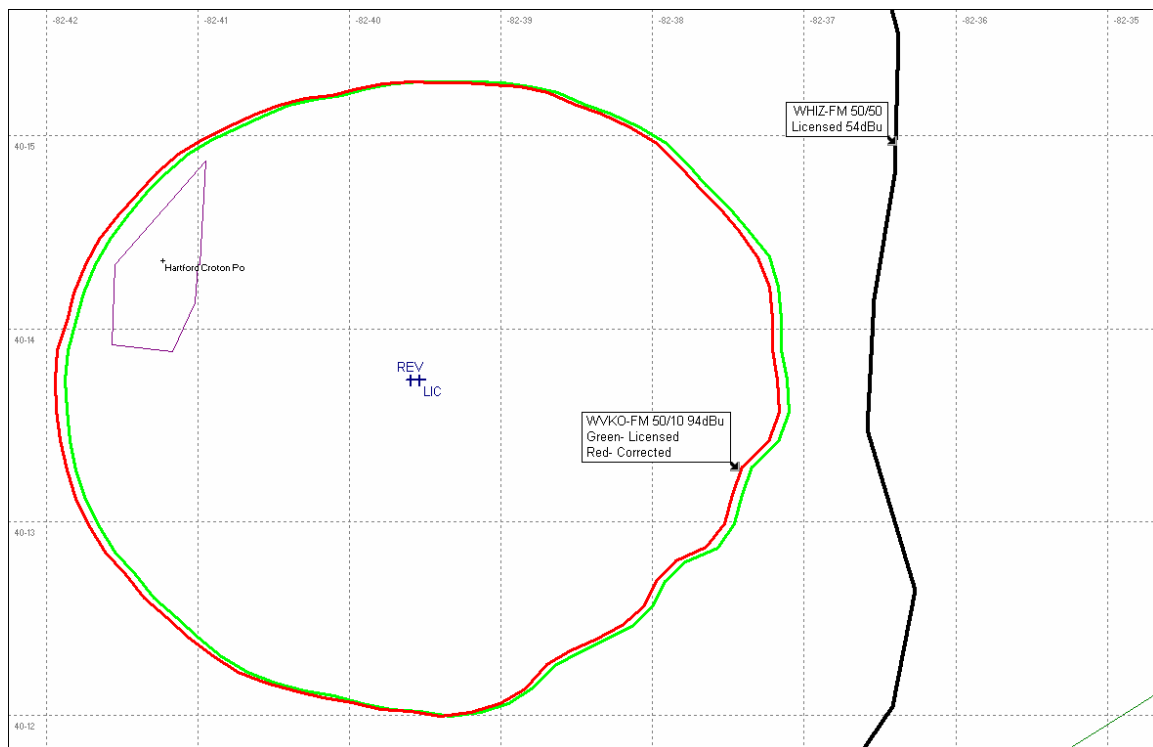
WV KO-FM DOES NOT PROPOSE TO MOVE. THIS IS A COORDINATE CORRECTION ONLY. THE DIFFERENCE BETWEEN THE LICENSED ALLOCATION AND THE CORRECTED ALLOCATION IS 0.090KM (295FT.) WEST. NO OTHER CHANGES TO THE TOWER OR TO THE OPERATION OF WV KO-FM IS PROPOSED.

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WVKO-FM, channel 276A, is allocated as a 3kw class A station licensed to Johnstown, OH. When the WVKO-FM allocation is analyzed from the corrected coordinates, WVKO-FM remains fully spaced to all stations under §73.207 with the exception of WHIZ-FM and WDHT. WDHT continues to meet the spacing requirements of §73.213 (c)(2).

WVKO-FM continues to be short-spaced with respect to 3rd adjacent station WHIZ-FM (licensed). Since the corrected coordinates for WVKO-FM are farther from WHIZ-FM than are the licensed WVKO-FM coordinates, and since WHIZ-FM operates as a §73.215 short spaced station with respect to WVKO-FM, it is not believed necessary to request WVKO-FM operation pursuant to §73.215 with respect to WHIZ-FM. Nevertheless, Exhibit A below demonstrates that the licensed WHIZ-FM facility will continue to provide the requisite §73.215 contour protection to WVKO-FM at its corrected coordinates.

EXHIBIT A, WVKO-FM AND WHIZ-FM CONTOURS



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**Allocation study, WVKO-FM- Licensed Coordinates
Using §73.213 (c)(2)**

ComStudy 2.2 search of channel 276 (103.1 MHz Class A3) at 40-13-44.0 N, 82-39-32.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
	BALTIMORE	OH	273	B1	48.14	48.00	174.2	0.1
	LANCASTER	OH	278	A	40.50	27.00	177.6	13.5
	PICKERINGTON	OH	278	A	31.71	27.00	184.4	4.7
WCOL-FM	COLUMBUS	OH	222	B	42.53	14.00	227.7	28.5
WCOL-FM	COLUMBUS	OH	222	B	42.53	14.00	227.7	28.5
WCOL-FM	COLUMBUS	OH	222	B	44.45	14.00	224.2	30.4
WDHT	SPRINGFIELD	OH	275	B	107.62	105.00	253.8	2.6
WDHT	SPRINGFIELD	OH	275	B	107.62	105.00	253.8	2.6
WHBR-FM	PARKERSBURG	WV	276	A	135.24	105.00	135.9	30.2
WHBR-FM	PARKERSBURG	WV	276	A	135.25	105.00	135.9	30.3
WHIZ-FM	BALTIMORE	OH	273	B1	50.19	48.00	189.5	2.2
WHIZ-FM	ZANESVILLE	OH	273	B	66.47	69.00	120.0	-2.5*
WHIZ-FM	ZANESVILLE	OH	273	B	66.45	69.00	120.0	-2.6*
WJZA	LANCASTER	OH	278	A	52.08	27.00	173.0	25.1
WJZA	LANCASTER	OH	278	A	40.50	27.00	177.6	13.5
WJZA	PICKERINGTON	OH	278	A	31.47	27.00	190.3	4.5

*- WHIZ-FM operates under Section 73.215 with respect to WVKO-FM

**Allocation study, WVKO-FM- Corrected Coordinates
Using §73.213 (c)(2)**

ComStudy 2.2 search of channel 276 (103.1 MHz Class A3) at 40-13-44.0 N, 82-39-35.8 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
	BALTIMORE	OH	273	B1	48.15	48.00	174.1	0.2
	LANCASTER	OH	278	A	40.51	27.00	177.4	13.5
	PICKERINGTON	OH	278	A	31.70	27.00	184.2	4.7
WCOL-FM	COLUMBUS	OH	222	B	42.47	14.00	227.6	28.5
WCOL-FM	COLUMBUS	OH	222	B	42.46	14.00	227.6	28.5
WCOL-FM	COLUMBUS	OH	222	B	44.38	14.00	224.1	30.4
WDHT	SPRINGFIELD	OH	275	B	107.53	105.00	253.8	2.5
WDHT	SPRINGFIELD	OH	275	B	107.53	105.00	253.8	2.5
WHBR-FM	PARKERSBURG	WV	276	A	135.30	105.00	135.9	30.3
WHBR-FM	PARKERSBURG	WV	276	A	135.31	105.00	135.9	30.3
WHIZ-FM	BALTIMORE	OH	273	B1	50.17	48.00	189.4	2.2
WHIZ-FM	ZANESVILLE	OH	273	B	66.54	69.00	120.0	-2.5*
WHIZ-FM	ZANESVILLE	OH	273	B	66.52	69.00	120.0	-2.5*
WJZA	LANCASTER	OH	278	A	52.09	27.00	172.9	25.1
WJZA	LANCASTER	OH	278	A	40.51	27.00	177.4	13.5
WJZA	PICKERINGTON	OH	278	A	31.46	27.00	190.1	4.5

*- WHIZ-FM operates under Section 73.215 with respect to WVKO-FM