

CHANGE OF COMMUNITY OF LICENSE
MINOR CHANGE APPLICATION
AMERICAN FAMILY ASSOCIATION
KAFR (FM) CHANNEL 202C1
CONROE, TX TO WILLIS, TX

City of License Change Review (307(b) Analysis)

This application by American Family Association. (AFA) seeks to change community of license from Conroe, TX to Willis, TX. This application is filed concurrently with an application for KVST (FM) in order to maintain community service to Willis, TX following KVST's change of licensed community to Huntsville, TX. New Wavo Communication, Inc. (New Wavo) has entered into an agreement for KAFR (202C1) to re-license from Conroe to Willis, TX. Conroe will continue to be served by three other primary stations.

There will be physical change to the operation of KAFR. KAFR currently places, and will continue to place greater than 70dBu service over 100% of the community of Willis, TX

New Wavo and AFA Propose the following changes:

Conroe

Present 202C1, 295C, KJOZ (AM), KYOK (AM)

Proposed 295C, KJOZ (AM), KYOK (AM)

Willis, TX

Present 259A

Proposed 202C1

Huntsville, TX

Present 213A, 269A, KHCH (AM), KHVL (AM)

Proposed 213A, 259C3, 269A, KHCH (AM), KHVL (AM)

Gain / Loss Services

Because there is no physical change to the operation of KAFR, there will be no service gained or lost from this facility. As shown in Exhibits D1 and D2, there are a plethora of services which provide service to the KAFR service area. There is no change to the number of services and since the loss area of KVST (FM) is contained within the KVST gain area, there is no loss of service overall. There is no portion of the loss area which will decrease service to the level of five or less stations. There are no areas which would be considered either white or gray, and the entire gain area receives service from a minimum of five primary FM and AM services currently.

Exhibit E1 demonstrates the gain and loss the KAFR Proposed community of license service area. Because there is no change in the physical facility, as demonstrated, there is no difference.

Urbanized Area

Because there is no change to the physical operation of KAFR, there are no issues with respect to the FCC “Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures”. Further, since KAFR (202C1) operates in the reserved band and is allocated per contour protection, and since Willis is slightly farther from the nearest urbanized area (Houston), there is no increased likelihood of relocating in a fashion that would encroach on any urbanized area.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direct supervision, and that they are true and correct to the best of his knowledge and belief.

A handwritten signature in cursive script, appearing to read "Bertram S. Goldman".

Bertram S. Goldman
Goldman Engineering Management, LLC
1511 Radcliffe Way, Auburn, CA. 95603
214-395-5067

EXHIBIT D2

Existing Protected Services to KAFR Licensed (Gain Area)- With KVST C3 Proposed

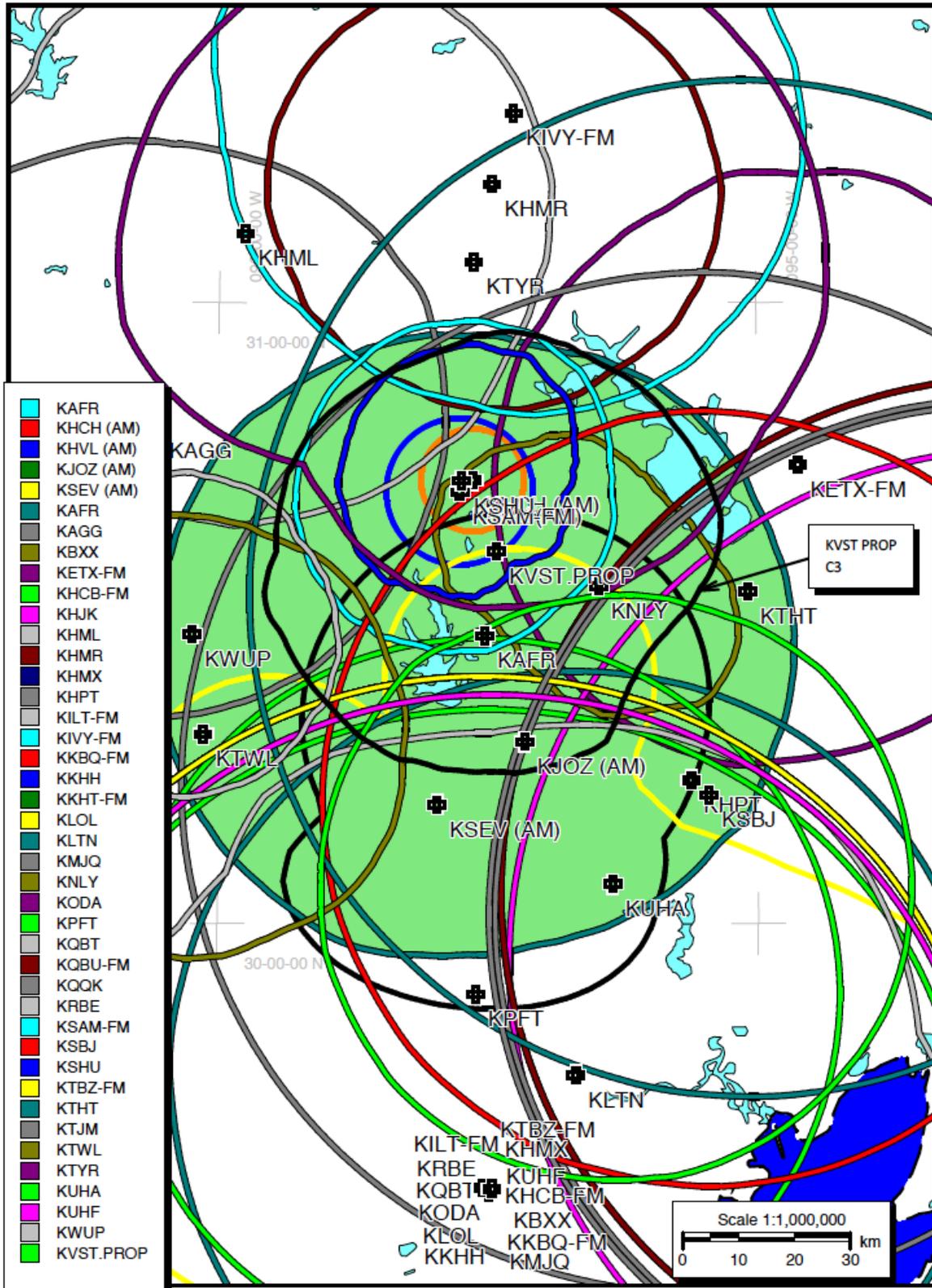


EXHIBIT E- KAFR 202C1 PROPOSED GAIN/ LOSS (Identical Coverage)

KAFR GAIN/ LOSS (NO CHANGE), CONROE TO WILLIS, TX

