

**August 2008
KWLZ-FM Channel 242C3
West Linn, OR
Allocation Study**

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C3 stations as prescribed in §73.207 of the Commission's Rules, with the exception of a short-spacing to the licensed operation of KZEL-FM on Channel 241C at Eugene. The spacing between the proposed KWLZ-FM transmitter site and KZEL-FM is 169 kilometers, whereas the required first-adjacent Class C3 to Class C spacing is 176 kilometers. However, KZEL-FM operates at just 333 meters HAAT, which is below the maximum for Class CØ. Full spacing for first-adjacent Class C3 to Class CØ is 163 kilometers

A search for an alternative channel for use by KWLZ-FM for the proposed operation which a) would not require reclassification of KZEL-FM, and b) would not require any other changes to the Table of Allotments, reveals that no alternative channel is available for the proposed service.

Therefore, the applicant respectfully requests that KZEL-FM be reclassified as a Class CØ facility, and that the instant KWLZ-FM application be processed as fully-spaced with respect to KZEL-FM.

KXXO Channel 241C Olympia

The spacing study indicates an apparent short-spacing to the licensed operation of KXXO on Channel 241C at Olympia. However, the KWLZ-FM 242C3 construction permit BPH-20070119AAT herein proposed to be modified was part of a contingent application group with an application by KXXO (BPH-20070119AAS) for a change in transmitter site, and the two applications were granted simultaneously. The KWLZ-FM construction permit bears a condition requiring activation of KXXO at its new transmitter site prior to or simultaneous with activation of the new KWLZ-FM facility.

The authorized KWLZ-FM (BPH-20070119AAT) and KXXO (BPH-20070119AAS) facilities are fully-spaced. The instant application proposes no change in the spacing between the new KWLZ-FM and KXXO facilities, and therefore the KXXO licensed facility is not believed to be any impediment to grant of the instant application.

LPFM Stations

It is noted that several authorized LPFM stations are short-spaced to the proposed KWLZ-FM West Linn facility. Each of these LPFM stations, however, is already pursuing a channel change as noted on the attached spacing study. Furthermore, each of these short-spacings is identical to the short-spacings which those LPFM stations already have to the authorized KWLZ-FM West Linn facility. Therefore, the LPFM authorizations are not believed to be any impediment to grant of the instant application.

=====

SEARCH PARAMETERS FM Database Date: 080822

Channel: 242C3 96.3 MHz Page 1
 Latitude: 45 29 20
 Longitude: 122 41 40
 Safety Zone: 32 km
 Job Title: KWLZ-FM 242C3 WEST LINN

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K240CZ LIC	TIGARD OR	BLFT-070208ACE	240D 95.9	0.019 385.0	45-30-58 122-43-59	315.2	4.27 0.00	0 TRANS
KPCN-LP APP	WOODBURN OR	BPL-080401BEH	240L1 95.9	0.029 54.6	45-08-29 122-51-21	198.1	40.64 0.64	40 CLOSE
KPVN-LP APP	WOODBURN OR	BPL-080401BEZ	240L1 95.9	0.029 54.6	45-08-29 122-51-21	198.1	40.64 0.64	40 CLOSE
K240DA LIC	STEVENSON WA	BLFT-070406ABP	240D 95.9	0.090 241.0	45-43-27 121-53-11	67.1	68.25 0.00	0 TRANS
KZEL-FM LIC	EUGENE OR	BLH-900321KB	241C 96.1	100.000 333.0	44-00-05 123-06-48	191.5	168.60 -7.40	176 SHORT
NOTE: PROPOSED C0 RECLASSIFICATION, FULL SPACING = 163 KM								
KXXOaux LIC	OLYMPIA WA	BXLH-080424ABN	241C 96.1	4.000 349.0	46-50-34 122-45-46	358.0	150.58 0.00	0 AUX
KXXO LIC	OLYMPIA WA	BLH-900308KB	241C 96.1	85.000 640.0	46-38-07 122-28-01	7.8	128.63 -47.37	176 SHORT
NOTE: KXXO AUTHORIZED FOR SITE CHANGE IN BPH-20070119AAS, CONTINGENT WITH KWLZ-FM REALLOTMENT TO WEST LINN								
KQRZ-LP CP	HILLSBORO OR	BNPL-010612AHG	242L1 96.3	0.100 12.1	45-30-27 122-58-02	275.7	21.42 -56.58	78 SHORT
NOTE: KQRZ-LP HAS PENDING APPLICATION FOR CHANNEL 268L1								
KKJC-LP LIC	MCMINNVILLE OR	BLL-030801BNR	242L1 96.3	0.100 17.0	45-09-39 123-09-14	224.7	51.25 -26.75	78 SHORT
NOTE: KKJC-LP HAS PENDING APPLICATION FOR CHANNEL 228L1								
KQSO-LP CP MOD	NEWBERG OR	BMPL-060613AAA	242L1 96.3	0.001 343.3	45-21-18 122-59-18	237.1	27.40 -50.60	78 SHORT
NOTE: KQSO-LP HAS PENDING APPLICATION FOR CHANNEL 228L1								
K242AF LIC	PORTLAND OR	BLFT-031112AGM	242D 96.3	0.034 299.0	45-27-17 122-32-58	108.5	11.96 0.00	0 TRANS
K242AB LIC	SALEM OR	BLFT-070822ADS	242D 96.3	0.250 48.0	44-56-33 123-02-01	203.7	66.31 0.00	0 TRANS
K242AX LIC	THE DALLES OR	BLFT-070402KPL	242D 96.3	0.013 494.0	45-38-57 121-16-19	80.3	112.47 0.00	0 TRANS
KWLZ-FM CP	WEST LINN OR	BPH-070119AAT	242C3 96.3	2.900 297.0	45-29-20 122-41-40	0.0 SS	0.00 -153.00	153 SHORT

=====

SEARCH PARAMETERS

FM Database Date: 080822

Channel: 242C3 96.3 MHz Page 2
 Latitude: 45 29 20
 Longitude: 122 41 40
 Safety Zone: 32 km
 Job Title: KWLZ-FM 242C3 WEST LINN

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KWLZ-FM	WEST LINN		242C3	0.000	45-31-58	64.0	11.17	153
RSV	OR -		96.3	0.0	122-33-57		-141.83	SHORT
KPCN-LP	WOODBURN		242L1	0.031	45-08-29	198.1	40.64	78
LIC	OR BLL-061114ADL		96.3	53.0	122-51-21		-37.36	SHORT
NOTE: KPCN-LP HAS PENDING APPLICATION FOR CHANNEL 240L1								
KPVN-LP	WOODBURN		242L1	0.031	45-08-29	198.1	40.64	78
LIC	OR BLL-061114ADM		96.3	53.0	122-51-21		-37.36	SHORT
NOTE: KPVN-LP HAS PENDING APPLICATION FOR CHANNEL 240L1								
K243BG	CORVALLIS		243D	0.250	44-38-25	205.9	104.76	0
LIC	OR BLFT-050930BMZ		96.5	388.0	123-16-25		0.00	TRANS
KWLZ-FM	WARM SPRINGS		243C	100.000	44-50-24	121.7	135.71	176
LIC	OR BLH-860127KG		96.5	332.0	121-13-56		-40.29	SHORT
NEW-T	RIDGEFIELD		243D	0.050	45-46-35	0.4	31.95	0
APP	WA BNPFT-030313AAW		96.5	148.0	122-41-30		0.00	TRANS
NEW-T	CULLY		244D	0.016	45-31-21	313.0	5.48	0
APP	OR BNPFT-030317IJR		96.7	396.0	122-44-45		0.00	TRANS
NEW-T	ROCKCREEK		244D	0.016	45-31-21	313.0	5.48	0
APP	OR BNPFT-030314ACI		96.7	396.0	122-44-45		0.00	TRANS
NEW-T	WILLBRIDGE		244D	0.010	45-31-23	310.3	5.88	0
APP	OR BNPFT-030310BHE		96.7	0.0	122-45-07		0.00	TRANS
NEW-T	ARIEL		244D	0.010	45-59-37	7.8	56.63	0
APP	WA BNPFT-030317KKM		96.7	805.0	122-35-42		0.00	TRANS
K296FT	WEST HAVEN		296D	0.028	45-29-20	0.0	0.00	0
LIC	OR BLFT-080116AAA		107.1	312.0	122-41-40		0.00	TRANS

44444 END OF FM SPACING STUDY FOR CHANNEL 242 44444