

**MINOR CHANGE APPLICATION/
CITY OF LICENSE CHANGE
CUMULUS LICENSING LLC
NEW FM RADIO STATION
CH 267C3 - 101.3 MHZ - 3.2 KW
PARACHUTE, COLORADO
January 2007**

EXHIBIT B

City of License Change Review

This application seeks to change the community of license of the authorized, yet unbuilt, New FM station on Channel 266C0 at Dinosaur, Colorado to Channel 267C3 at Parachute, Colorado. This change is proposed using the recently adopted city of license change procedures, as outlined in MB Docket 05-210, released November 29, 2006. Cumulus herein reviews the proposed change and demonstrates compliance with the Commission's rules/procedures for a community of license change.

As indicated on Exhibit B1, Channel 267C3, at the proposed allocation site at Parachute, Colorado, meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207.¹ The proposed allotment at Parachute, Colorado is mutually exclusive with the authorized New FM facility at Dinosaur, Colorado. The New FM facility at Dinosaur, Colorado is not a licensed station, having not yet begun operation. As such, while it would theoretically provide a first local service to Dinosaur, this service does not presently exist. Cumulus, in a separate filing, is submitting a Petition for Rule Making seeking to allot Channel 262C0 to Dinosaur, Colorado, which will provide an

1) The site for the implementation of the change of community is proposed pursuant to §73.215 of the rules, therefore, a fully spaced reference site has been identified. A map showing the allocation site is included.

alternate potential service to the community.² As the New FM permit at Dinosaur is not operational, the change of community to Parachute, Colorado will not eliminate an actual service, only potential service. That potential service is effectively replaced by the proposed new allotment of Channel 262C0 at Dinosaur. As a result of the herein requested change, the community of Parachute will receive its first local station, without depriving Dinosaur of its first potential local service.

Exhibit B2 is a map of the theoretical 70 dBu contour (non-terrain impacted) from the proposed allocation site and shows the allotment site does provide a 70 dBu contour over all of the proposed new community of license of Parachute, Colorado.³ The proposed allocation site is suitable for the proposed allotment of Channel 267C3, as the site is not located off-shore, in a National Forest or on airport property, as indicated on the attached map (Exhibit B3) and, therefore, is suitable for tower construction.

Therefore, Cumulus proposed the following:

Parachute, Colorado

Present	Proposed
None	267C3

Dinosaur, Colorado

Present	Proposed
266C0	262C0

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- 2) The proposed allocation site for Channel 262C0 at Dinosaur, Colorado is North Latitude 40° 03' 26" and West Longitude 108° 39' 46". From the proposed allocation site, Channel 262C0 will provide a 70 dBu signal over all of Dinosaur, Colorado (see companion Petition).
 - 3) Additionally, a non-terrain impacted 70 dBu contour would encompass the entire community of Parachute, Colorado.

As the allocation site for Channel 267C3 at Parachute, Colorado is different than the outstanding CP site for the New FM at Dinosaur, there is a theoretical gain and loss area, as well as a common area between the 60 dBu contours. The permitted New FM facility at Dinosaur, Colorado would provide a 60 dBu contour to 19,054 persons in 21,851.6 square kilometers.⁴ The proposed allotment site for Channel 267C3 at Parachute, Colorado will provide a 60 dBu contour to 24,777 persons in 4,802.9 square kilometers. The requested move will create a theoretical loss to 10,613 persons in 19,014.4 square kilometers and a net gain of service to 16,336 persons in 1,965.7 square kilometers.⁵

The area of theoretical gain and loss is shown on Exhibit B4. A list of the stations and allocations in the gain/loss area is attached as Exhibit B5. A maximum Class C0 facility from the permit site, provides service to a theoretical white area. This area contains 68 persons in 1,619.9 square kilometers. There is also a theoretical second service provided to 475 persons in 1,446.2 square kilometers. These areas will receive service from the pending application for a new FM station at Rangely, Colorado ("Rangely"), BNPH-20060303ABG. Rangely will deliver coverage to all of the identified white and gray populated areas. Further, the proposed allotment of Channel 262C0 will also provide service to both the white and gray populated areas. The gain area at Parachute has no white or gray areas.

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- 4) All contour data is based on a radius of the maximum for the class under review with no terrain considered. Population data is 2000 US Census.
 - 5) The allotment of Channel 262C0 to Dinosaur, Colorado, will provide a 60 dBu contour to 11,426 persons in 21,851.6 square kilometers. The proposed service area of Channel 262C0 will provide a gain of 4,124 persons in 2,545.8 square kilometers over the present New FM permit in Dinosaur, Colorado. The small loss area contains 11,749 persons in 2,545.8 square kilometers (comparing the present Dinosaur CP and the proposed Channel 262C0 reference).

Parachute, Colorado is not located in or near any Urbanized Area, as defined by the US Census Bureau. Attached as Exhibit B6 is a coverage map of the actual Parachute, Colorado facility. The facility will provide 60 dBu coverage to 36,505 persons in 5,953.3 square kilometers and a 70 dBu contour to 22,691 persons in 2,197.7 square kilometers. Exhibit B7 are the stations providing protected service to the community of Parachute, Colorado. Based on the foregoing, the proposed change of community of license complies with the Commission's rules and regulations.

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EXHIBIT B1

Allocation Study for New FM Parachute, Colorado
Using Proposed Allocation Site as Reference

REFERENCE				CLASS = C3		DISPLAY DATES		
39 29 41.0 N.				Current		DATA 01-12-07		
107 57 13.0 W.				Spacings		SEARCH 01-12-07		
----- Channel 267 - 101.3 MHz -----								
Call	Channel	Location		Azi	Dist	FCC	Margin	
	Lat.	Lng.	Ant	Power	HAAT			
NEW	CP 266C0	Dinosaur	CO	309.8	74.65	163.0	-88.35	
	39 55 21.0	108 37 31.0	CX	43.000 kW	602 M			
	Cumulus Licensing Llc		BNPH-20050103AGL					
KIQX	CP 267C	Durango	CO	176.6	237.06	237.0	0.06	
	37 21 46.0	107 47 37.0	CY	30.000 kW	608 M			
	Four Corners Broadcasting		BMPH-20050404AAC					
KMOZ-FM	LIC 264C1	Grand Junction	CO	235.3	83.18	76.0	7.18	
	39 03 59.4	108 44 40.9	CX	30.000 kW	475 M			
	MBC Grand Broadcasting, Inc.		BLH-20061025ADV					
KTUN	APP 269C1	Eagle	CO	71.2	98.65	76.0	22.65	
	39 46 32.0	106 51 48.0	CX	10.500 kW	696 M			
	NRC Broadcasting, Inc.		BPH-20061002BXC					
AU7010615VAC	267C	Sinclair	WY	13.4	260.22	237.0	23.22	
	41 46 19.0	107 13 40.0		100.000 kW	600 M			
	FCC		RM-rfs113					
KTUN	LIC-Z 269C1	Eagle	CO	74.3	102.73	76.0	26.73	
	39 44 18.0	106 47 58.0	ZC	12.000 kW	667 M			
	NRC Broadcasting, Inc.		BLH-20050915ADE					
KVOV	LIC-D 213C2	Carbondale	CO	99.4	50.97	17.0	33.97	
	39 25 08.0	107 22 10.0	DCX	0.450 kW	775 M			
	Public Broadcasting of Col.		BLED-20040913AAA					
KIQX	LIC 267C1	Durango	CO	178.9	247.82	211.0	36.82	
	37 15 45.0	107 54 07.0	CY	100.000 kW	119 M			
	Four Corners Broadcasting		BLH-19811102AF					
AL9051	VAC 270C2	Olathe	CO	181.4	98.80	56.0	42.80	
	38 36 18.0	107 58 54.0	N	50.000 kW	150 M			
	Mountain West Broadcasting		RM-9438					
KOSI	LIC-D 266C	Denver	CO	82.7	234.91	176.0	58.91	
	39 43 45.0	105 14 06.0	DC	100.000 kW	495 M			
	Entercom Denver License		BLH-20020118AAJ					

Allocation Reference

Latitude: 39-29-41 N
Longitude: 107-57-13 W
ERP: 25.00 kW
Channel: 267C3
Frequency: 101.3 MHz
AMSL Height: 2245.79 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model : None

Graham Brock, Inc. - Broadcast Technical Consultants

70 dBu (3.16 mV/m)

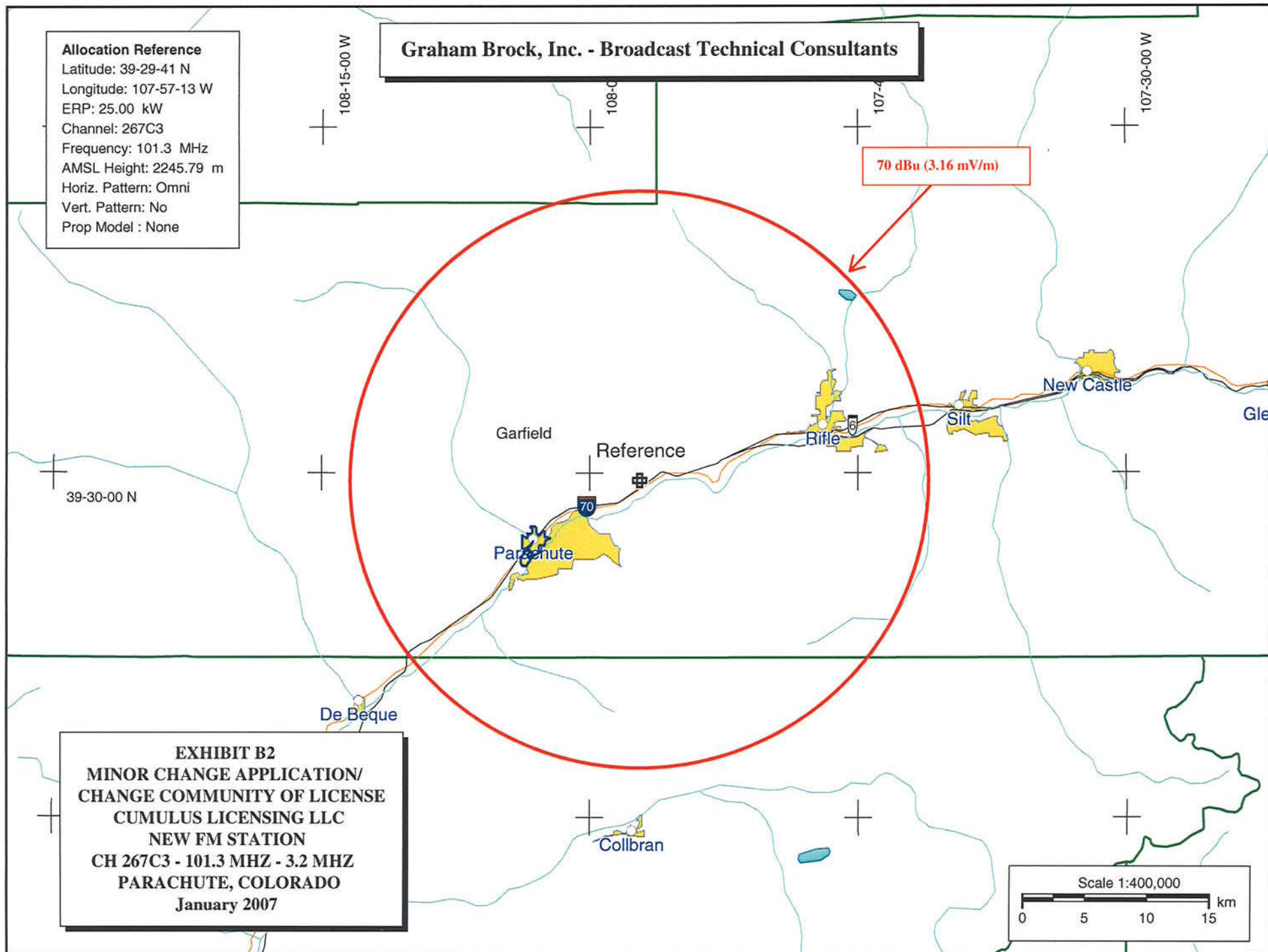


EXHIBIT B2
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GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

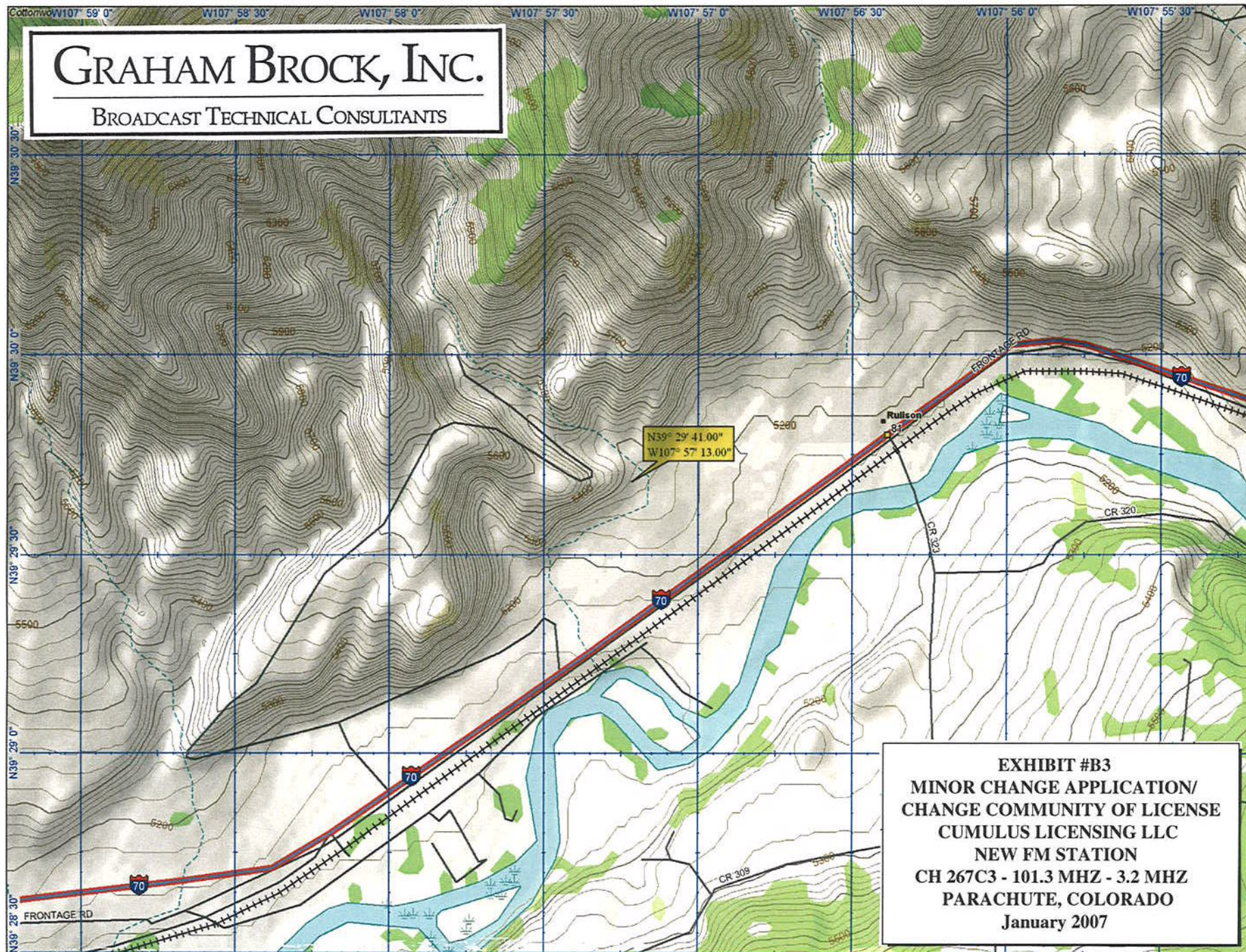


EXHIBIT #B3
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Scale: 1 : 24,000 Map Rotation: 0° Magnetic Declination: 11.7°E

1,000 ft

Graham Brock, Inc. - Broadcast Technical Consultants

CHANNEL 262C0 DINOSAUR.CO

NEW FM DINOSAUR

White/Gray population key:
(w/o Rangely or backfill)
A - No population in area.
B - 1 person.
C - 67 persons.
D - No population in area.
E - 360 persons.
F - 115 persons.

EXHIBIT B4
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CHANNEL 267C3 PARACHUTE

Scale 1:1,250,000

A horizontal scale bar with markings at 0, 20, 40, and 60 km.

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EXHIBIT B5

<u>Call</u>	<u>Lic</u>	<u>Channel</u>	<u>Class</u>	<u>City, State</u>
KDNK	Lic	201	C2	Glenwood Springs, CO
KAFM	Lic	201	A	Grand Junction, CO
KCIC	Lic	203	A	Grand Junction, CO
KCJX	Lic	205	C1	Carbondale, CO
KPRN	Lic	208	C1	Grand Junction, CO
KLFV	Lic	212	C2	Grand Junction, CO
KVOV	Lic	213	C2	Carbondale, CO
KMSA	Lic	217	C2	Grand Junction, CO
KLXV	Lic	220	C2	Glenwood Springs, CO
KJYE	Lic	222	C	Grand Junction, CO
KCUA	Lic	223	C3	Naples, UT
KKCH	Lic	224	C	Glenwood Springs, CO
KMGJ	Lic	226	C0	Grand Junction, CO
KRAI-FM	Lic	229	C1	Craig, CO
KXRQ	Lic	232	C1	Roosevelt, UT
KJEB	Lic	233	C3	New Castle, CO
KXRQ	CP	234	C2	Roosevelt, UT
KKNN	Lic	236	C	Delta, CO
KRVG	RSV	238	C2	Glenwood Springs, CO
KIDN-FM	CP	240	C2	Hayden, CO
KSTR-FM	Lic	241	C	Montrose, CO
KQSW	Lic	243	C	Rock Springs, WY
KUUR	CP	244	A	Carbondale, CO
ALL	VAC	249	C3	Orchard Mesa, CO
KAYW	CP	251	C0	Meeker, CO
KAAI	CP	253	C3	Palisade, CO

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EXHIBIT B5 (continued)

<u>Call</u>	<u>Lic</u>	<u>Channel</u>	<u>Class</u>	<u>City, State</u>
KIFX	Lic	253	C2	Roosevelt, UT
AL1032	VAC	255	C3	Fruita, CO
KMTS	Lic	256	C3	Glenwood Springs, CO
KSIT	Lic	259	C	Rock Springs, WY
KEKB	Lic	260	C	Fruita, CO
KMOZ-FM	Lic	264	C1	Grand Junction, CO
KTUN	Lic	269	C1	Eagle, CO
KQZR	Lic	273	C	Craig, CO
AL6785	VAC	275	C3	DeBeque, CO
KPRU	Lic	277	C2	Delta, CO
KMXY	Lic	282	C0	Grand Junction, CO
KZKS	Lic	287	C	Rifle, CO
KLCY-FM	Lic	288	C2	Vernal, UT
Al6512	VAC	293	C	Olathe, CO
AP6604	APP	295	C1	Rangely, CO
KTRJ	Lic	297	C2	Hayden, CO
KBKL	CP	300	C	Grand Junction, CO

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New FM

Latitude: 39-28-35 N
Longitude: 107-48-13 W
ERP: 3.20 kW
Channel: 267C3
Frequency: 101.3 MHz
AMSL Height: 2347.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model : FCC
60 dBu pop. : 36,505 (2000)
60 dBu area : 5,953.3 sq. km.
70 dBu pop. : 22,691 (2000)
70 dBu area : 2,197.7 sq. km.

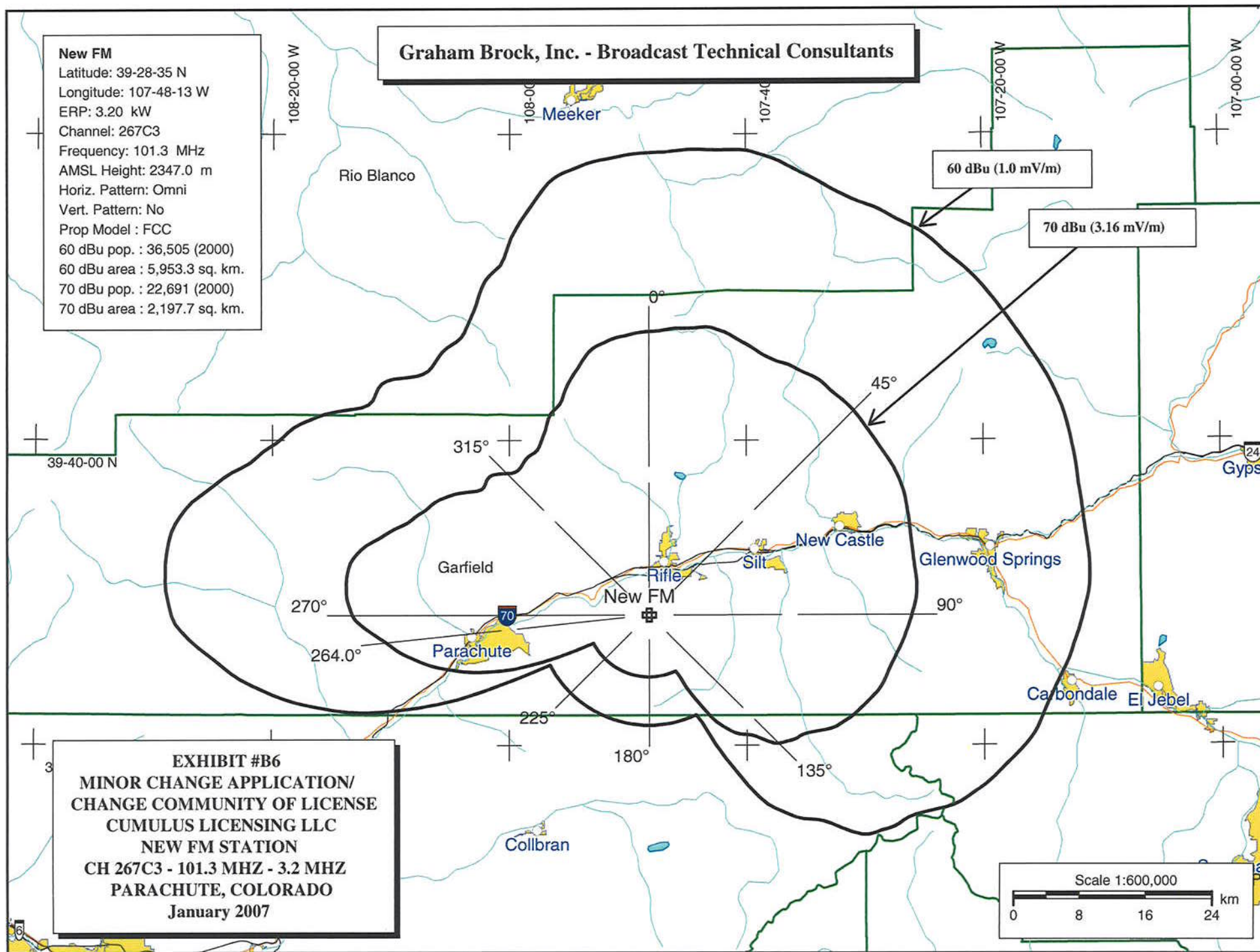


EXHIBIT #B6
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RED CONTOURS ARE AM 2.0 mV/m

BLACK CONTOURS ARE FM 60 dBu

PARACHUTE, CO

KAYW

39-30-00 N

KZKS

Garfield

Rifle

KRGS

New Castle

KJEB

Glennwood Springs

KKCH

Carbondale

De Beque

Collbran

Palisade

KNZZ

Cedaredge

Scale 1:700,000

0 9 18 27 km

STATIONS PROVIDING SERVICE

EXHIBIT #B7
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EXHIBIT B7(1)

Stations Providing Protected Service to Parachute, Colorado

FM Stations

Call	Channel	City, State
KAYW	251C	Meeker, Colorado
KBKL	300C	Grand Junction, Colorado
KCJX	205C1	Carbondale, Colorado
KEKB	260C	Fruita, Colorado
KJEB	233C3	New Castle, Colorado
KJYE	222C	Grand Junction, Colorado
KKCH	224C	Glenwood Springs, Colorado
KMGJ	226C0	Grand Junction, Colorado
KMOZ-FM	264C1	Grand Junction, Colorado
KMXV	282C0	Grand Junction, Colorado
KPRN	208C1	Grand Junction, Colorado
KQZR	273C	Craig, Colorado
KZKS	287C	Rifle, Colorado

AM Stations

Call	Frequency	City, State
KJOL	620 kHz	Grand Junction, Colorado
KNZZ	1100 kHz	Grand Junction, Colorado
KRGS	690 kHz	Rifle, Colorado