

The applicant is presently authorized to operate out-of-core TL K67GU, Eureka, CA, at a location slightly south of Ferndale, California, and approximately 35 kilometers from Eureka. It is now proposed to relocate the facility to a site much nearer its city of license, at the same time changing to Channel 20z. The distance of the relocation would be 37.3 kilometers and the following justifications are submitted:

1. Although facilities authorized on in-core channels can look forward to various options under the DTV transition, it is a certainty that this out-of-core channel will one day be permanently deleted.
2. The existing authorization is minimally (7 watts ERP) powered, such that it provides a service area encompassing only 3.4 square kilometers with a population count of--literally--zero.
3. In allocation proceedings, the Commission has historically assigned a high priority to maximization of service; i.e.: favoring of proposals which would provide for the highest and best use of spectrum. In this specific case, the proposed changes would increase the area served to 2,498 square kilometers with a population count of 109,203.
4. Finally, a grant of this application would not adversely affect any other allocation, authorization or pending application.

As shown in attached Exhibit 6A, the authorized service contour is wholly contained within the proposed. A review of all available records (please see attached Exhibit 6B) indicates predicted interference to various entries.