

## **TECHNICAL NARRATIVE**

This Technical Statement and attached exhibits were prepared on behalf of Southwest FM Broadcasting Co., Inc. ("Southwest"), licensee of station KAHM, Channel 271C, Prescott, Arizona. Southwest herein proposes a minor change application to the facilities of KAHM to modify the license to operate on Channel 271C1, licensed to Spring Valley, Arizona.

### **Overview**

One minor change to the FM Spectrum is proposed. The minor change involves a city of license change and transmitter site change for station KAHM(FM). Southwest requests the Commission to issue two licensed stations an Order to Show Cause. Station KVGG(FM) (Facility ID# 165984) Salome, AZ and KBUX(FM) (Facility ID# 7694) Quartzsite, AZ will be required to change their frequency in order to effectuate the city of license and application site change for KAHM. Southwest FM Broadcasting Co, Inc. states that it will reimburse Kemp Communications, Inc., licensee of Station KVGG(FM) for the reasonable expenses connected with the change in channel at Salome and Maude J. Burdette, licensee of Station KBUX(FM) for the reasonable expenses connected with the change in channel at Quartzsite. This proposal contemplates first local service at Spring Valley, AZ. No Low Power FM stations (LPFM's) or Class D FM stations are affected by this filing.

The proposal is described in its entirety for the convenience of the FCC staff but the actual requests are made by the application itself unless otherwise directed by the Report and Order in Docket 05-210.

## **Modification of KAHM(FM) from Channel 271C at Prescott, AZ to Channel 271C at Spring Valley, AZ**

KAHM-FM Channel 271C Prescott, AZ seeks to be modified to provide a new first local transmission service to the community of Spring Valley, AZ. Spring Valley is a Census Designated Place (CDP) with a 2000 Census population of 1,019 persons. The proposed reference site at 34° 41' 14" North Latitude 112° 07' 01" West Longitude for KAHM(FM) is mutually exclusive with the licensed facility of KAHM(FM). This modification is also compliant with all the requirements of 47CFR §73.207 and 47CFR §73.315. Southwest is proposing to implement this change at an existing tower site. As such, the Federal Aviation Administration will not be apprised of this proposal. The coordinates of the proposed application site are 34-14-03 North Latitude, 112-22-01 West Longitude (NAD 27). The present tower extends less than 200 feet above ground level and has not been registered with the Commission or assigned an Antenna Structure Registration Number.

Channel studies indicate there are no other Class C channels available to KAHM(FM) to relocate to the proposed transmitter site. The application site Channel Study for KAHM on Channel 271C shows short-spacings to five existing stations. The proposed KAHM application site is short spaced to station KVGG Channel 270A, licensed to Salome, AZ by 44.78 km., KCMT Channel 271C1, licensed to Oro Valley, AZ by 20.41 km., KJJJ Channel 272C1, licensed to Laughlin, AZ by 5.43 km., KNIX-FM Channel 273C, licensed to Phoenix, AZ by 1.18 km. and KZON Channel 268C, licensed to Phoenix, AZ by 0.96 km. KAHM proposes to adopt Section 73.215 contour protection to four of the five stations. By operating with an effective radiated power of 25.5 kilowatts at 852 meters HAAT, KAHM will not overlap protected or interfering contours with KCMT, KJJJ, KNIX-FM or KZON. KVGG is located 120.24 km from the

proposed KAHM(FM) transmitter site. The minimum spacing allowed under Section 73.215 is 142 km. A channel study (which is included as an attachment to this application) shows that KVGG can be re-assigned to Channel 231A by modifying one other station, KBUX(FM) Channel 232A Quartzsite, AZ. A Channel Study (which is included as an attachment to this application) shows that KBUX(FM) can be re-assigned to Channel 243A. Therefore Southwest requests the Commission to issue an Order to Show Cause to stations KVGG and KBUX. Southwest FM Broadcasting Co, Inc. states that it will reimburse Kemp Communications, Inc., licensee of Station KVGG(FM) for the reasonable expenses connected with the change in channel at Salome and will reimburse Maude J. Burdette, licensee of Station KBUX(FM) for the reasonable expenses connected with the change in channel at Quartzsite. Copies of the KAHM(FM) FCC Form 301 Minor Modification Application and all associated attachments and exhibits have been sent by First Class mail to the addresses listed in CDBS for KVGG(FM) and KBUX(FM).

<u>Station</u>	<u>Current Channel/Class</u>	<u>Proposed Channel/Class</u>
KAHM	271C	271C
KVGG	270A	231A
KBUX	232A	243A

The Application Site F(50,50) 70 dBu principal community contours covers 100% of the Spring Valley, Arizona corporate boundaries. The licensed KAHM(FM) 271C facility serves within the FCC F(50,50) 60 dBu protected contour an area of 25,556.7 sq. km. and 264,894 persons. Because the Hypothetical Reference Site for KAHM(FM) Channel 271C at Spring Valley uses the same coordinates as the licensed facility for KAHM(FM) Channel 271C at Prescott, there is no change in the area or population served. Thus, the Gain/Loss Exhibit and Remaining Services Exhibit have not been included with this filing.

Both the current licensed facility of KAHM(FM) and the proposed KAHM(FM) at Spring Valley, Arizona FCC F(50,50) 70 dBu contours covers 100 percent of the Prescott, Arizona Urbanized Area. Neither the Hypothetical Reference Site or the proposed application site for KAHM(FM) at Spring Valley will cover more than fifty percent of any other Urbanized Area. Therefore a Tuck Showing is not required showing because KAHM(FM) is not migrating into an Urbanized Area. *See, e.g., Greeley and Broomfield, CO*, 15 FCC Rcd 9419, 9420 (MMB 2000) (No *Tuck* analysis required when 70 dBu contour already placed over majority of urbanized area).

### **Summary**

As the foregoing demonstrates, the net result of this minor change proposal is first local transmission service to a worthy Arizona community with 2000 U.S. Census population of 1,019 persons. No community would suffer the loss of its sole transmission service. This proposal creates no white or gray areas and there are no individuals that would receive fewer interference-free services as a result of the grant of this proposal. Second, Prescott will not be deprived of local service since seven other stations; KNAQ(FM) Channel 207A, KJZP(FM) Channel 211A, KGCB(FM) Channel 215C, KTMG(FM) Channel 256A, KPPV(FM) Channel 294C2, KNOT(AM) 1450 kHz and KYCA(AM) 1490 kHz will continue to serve that community. Third, the Spring Valley proposal is greatly preferred under the Commission's priorities. The comparison results in a first local service at Spring Valley versus the retention of an eighth local service at Prescott. *See Revision of FM Assignment Policies and Procedures, supra.*