

**Engineering Statement in Support of
Change to the Community of License****Introduction**

Educational Media Foundation requests a community of license change for KLVK from Fountain Hills, AZ to Maricopa, AZ.

This statement is included to show that the proposed move will comply with the 307(b) fair distribution guidelines.

Discussion

In the instructions for the new Form 340, the FCC describes several points that are suggested for a showing that the proposed community of license change would result in a preferential arrangement of allotments under section 307(b).

1. Minimum Requirements

The commission has requested that any 307(b) showing contain the following minimum information:

- The number of stations licensed to the current community of license is 1. The number of stations licensed to the proposed community of license is 1.
- The number of stations providing service to the current community of license is 49. The number of stations providing service to the proposed community of license is 45.
- The population of the proposed community of license is 43,482.
- Description of the civic, cultural, religious, social and commercial attributes of the proposed community of license. The proposed city of Maricopa, AZ is a licensable community as shown in Exhibit 25-G.

2. Other Relevant Information**A. No change in service area**

Exhibit 25-A shows the relation between the current community of license and the requested community of license city of Maricopa, AZ. As can be seen in Exhibit 25-B, the currently authorized facility will provide adequate coverage to Maricopa. Therefore this proposal is in compliance with 73.315.

The proposed community of license change request does not include a transmitter move and KLVK will function as specified in its current license (BLED-20100720AIX).

Since the transmitter properties will not change, the entire area within the contour of KLVK will remain the same thus no underserved area will be created or currently served area affected.

B. Number of Aural Services

In order to show that Fountain Springs, AZ, the community of license that is currently served by KLVK, continues to be served when the proposed move is granted, several exhibits follow.

- Exhibit 25-C shows all facilities that serve any portion of the current KLVK community of license area of Fountain Hills, AZ. See Exhibit 25-C1 for a station list along with a service count.
- Exhibit 25-D also provides a color coded showing of the number of stations that provide service within the current licensed contour of KLVK. As can be seen the entire area is well served by 5 or more stations, not including KLVK.

3. Urban Area Consideration

No changes in the technical facilities of KLVK are proposed. No change in service to any UA will occur.

Exhibit 25-E is a map outlining the Phoenix/Mesa UA and the Maricopa UA along with the protected service contour of KLVK. The red shaded areas are the portions of the urbanized areas that are inside the KLVK protected service contour.

Exhibit 25-F is an overlap population study which demonstrates the population and area of the Phoenix/Mesa and Maricopa Urbanized Areas that fall within the KLVK protected service contour. The KLVK protected service contour currently covers more than 50% of both Urbanized Areas.

Fountain Hills has 49 AM and FM signals that reach all or part of the community of license. Fountain Hills is part of the Phoenix/Mesa UA with more than 5 stations licensed to communities that are also a part of this urbanized area. Therefore, Fountain Hills is not required to have a station licensed to it. Maricopa is an urbanized area with no other communities contained in the urbanized area. Maricopa has a population of over 7,500 persons. Therefore, Maricopa is required to have at least two services licensed to its community.

4. Contingent Applications

Simultaneously with this application, EMF and East Valley Institute Of Technology District #401, are filing applications to change the community of licenses for KLVA (Facility ID No. 2749) and KPNG (Facility ID No. 173984).

KLVA is currently licensed to Maricopa, AZ and is requesting a change of the community of license from Maricopa to Avondale, AZ. KPNG is currently licensed to Chandler, AZ and is requesting a change from Chandler to Maricopa, AZ. These two proposed changes along with this proposed change to KLVK will give Avondale, AZ its first local service and maintain two local services for Maricopa, AZ.

This exhibit demonstrates the combined public interest benefits that will result in the implementation of the changes proposed in the three concurrently filed applications for KLVK, KLVA, and KPNG.

With the KLVK and KPNG proposed community of license changes to Maricopa, AZ, the KLVA former community of license, Maricopa, AZ, will continue to be served by the following facilities:

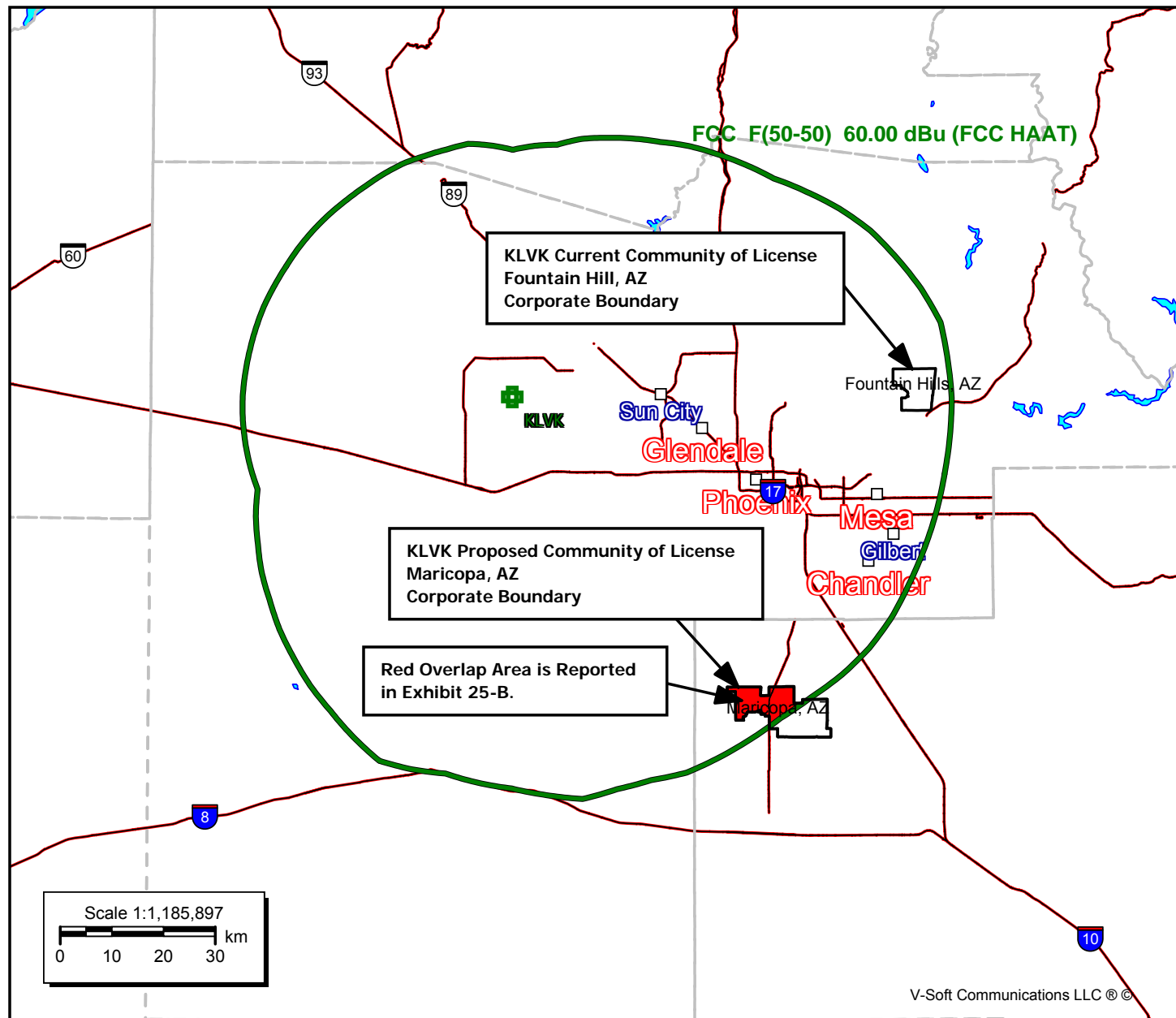
FIN	Call Sign	Proposed Community of License
76329	KLVK	Maricopa, AZ
173984	KPNG	Maricopa, AZ

Respectfully submitted,

James L Travis
Signal Development
Educational Media Foundation
November 4, 2016

Exhibit 25-A Community of License Coverage

KLVK
BLED20100720AIX
Latitude: 33-35-33 N
Longitude: 112-34-49 W
ERP: 30.00 kW
Channel: 206
Frequency: 89.1 MHz
AMSL Height: 1232.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None



Educational Media Foundation
5700 West Oaks Boulevard
Rocklin, CA 95765

Exhibit 25-B
Maricopa, AZ

Overlap Report

Overlap Population Report
KLVK (206) / Maricopa, AZ

Overlap Area Type: Intersection
Areas Included:

KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)
PGON: Maricopa, AZ

Population Database: 2010 US Census (PL)

Total Population: 38,514
Housing Units: 15,285
Overlap Area: 64.45 sq. km

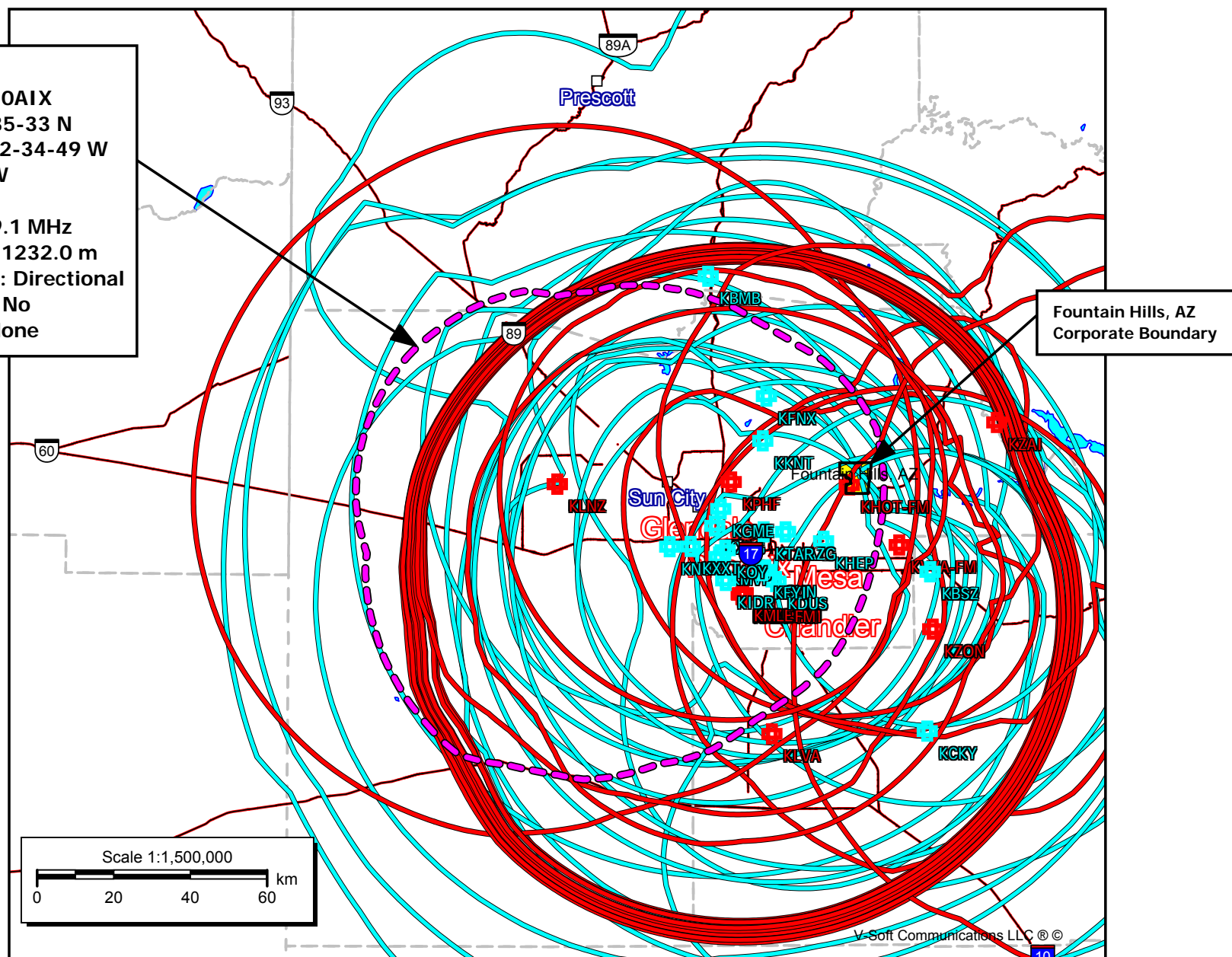
Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
KLVK (206): FCC 60(F50-50)	3,584,254	13,979	1.1 %	0.5 %
PGON: Maricopa, AZ	43,482	124.79	88.6 %	51.6 %

*Note - The city limits and population were calculated using the 2010 Census data as rendered by V-Soft Communications program Probe 4.

Blue Contours - 2mv/m Daytime
Red Contours - 60dbu(F50-50)

Exhibit 25-C Fountain Hills, AZ Number of Service Contours

KLVK
BLED20100720AIX
Latitude: 33-35-33 N
Longitude: 112-34-49 W
ERP: 30.00 kW
Channel: 206
Frequency: 89.1 MHz
AMSL Height: 1232.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None



Service Count Report

Service Count Area for Fountain Hills, AZ

Service Count Population Report -KLVK(206):FCC F(50-50) 60.00 dBu (FCC HAAT)

Reference Area: KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)

Counting Grid Cell Size: 0.5 sq. km

Population Database: 2010 US Census (PL)

Count Area	Population	Housing Units	Area (sq. km)
-----	-----	-----	-----
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	0	0	0.00
4 Service	0	0	0.00
5 or more	3,584,529	1,537,791	14151.20
Reference Area	3,584,529	1,537,791	14151.20

The following stations provide service to Fountain Hills, AZ which is a part of the Phoenix/Mesa Urbanized Area:

FM Stations 60dbu(F50-50)

Call Sign	Lic	Chan.	Svc	Cls	City	ST	DA	Power
-----	---	-----	---	---	-----	--	--	-----
KLVA	LIC	288	M	C2	Maricopa	AZ	No	50.0
KPHF	LIC	202	M	C1	Phoenix	AZ	No	22.5
KLVK	LIC	206	M	C0	Fountain Hills	AZ	Yes	30.0
KBAQ	LIC	208	M	C1	Phoenix	AZ	Yes	30.0
KZAI	LIC	210	M	C	Superior	AZ	Yes	45.0
KFLR-FM	LIC	212	M	C	Phoenix	AZ	Yes	100.0
KJZZ	LIC	218	M	C	Phoenix	AZ	No	100.0
KTAR-FM	LIC	222	M	C	Glendale	AZ	No	100.0
KDKB	LIC	227	M	C	Mesa	AZ	No	100.0
KOOL-FM	LIC	233	M	C	Phoenix	AZ	No	100.0
KYOT-FM	LIC	238	M	C	Phoenix	AZ	No	100.0
KMXP	LIC	245	M	C	Phoenix	AZ	No	100.0
KUPD	LIC	250	M	C	Tempe	AZ	No	100.0
KMVP-FM	LIC	254	M	C	Phoenix	AZ	No	100.0
KESZ	LIC	260	M	C	Phoenix	AZ	No	100.0
KQMR	LIC	262	M	C	Globe	AZ	No	90.0
KSLX-FM	LIC	264	M	C	Scottsdale	AZ	No	100.0
KALV-FM	LIC	268	M	C	Phoenix	AZ	No	100.0
KNIX-FM	LIC	273	M	C	Phoenix	AZ	No	100.0
KLNZ	LIC	278	M	C	Glendale	AZ	No	62.0
KZON	LIC	280	M	C1	Gilbert	AZ	Yes	100.0
KZZP	LIC	284	M	C	Mesa	AZ	No	100.0
KHOT-FM	LIC	290	M	C2	Paradise Valley	AZ	Yes	36.0
KVVA-FM	LIC	296	M	C3	Apache Junction	AZ	No	17.0
KMLE	LIC	300	M	C	Chandler	AZ	No	100.0

AM Stations (2mv/m Daytime)

KFLT	830	TUCSON	AZ
KSAZ	580	MARANA	AZ
KSUN	1400	PHOENIX	AZ
KCKY	1150	COOLIDGE	AZ
KBSZ	1260	APACHE JUNCTION	AZ
KIHP	1310	MESA	AZ
KDUS	1060	TEMPE	AZ
KHEP	1580	TEMPE	AZ
KIKO	1340	APACHE JUNCTION	AZ
KFNX	1100	CAVE CREEK	AZ
KAZG	1440	SCOTTSDALE	AZ
KMVP	860	PHOENIX	AZ
KFYI	550	PHOENIX	AZ
KPXQ	1360	GLENDALE	AZ
KXEG	1280	PHOENIX	AZ
KOY	1230	PHOENIX	AZ
KKNT	960	PHOENIX	AZ
KNUV	1190	TOLLESON	AZ
KXXT	1010	TOLLESON	AZ
KGME	910	PHOENIX	AZ
KIDR	740	PHOENIX	AZ
KTAR	620	PHOENIX	AZ
KFNN	1510	MESA	AZ
KBMB	710	BLACK CANYON CITY	AZ

Total: 49 stations provide service to Fountain Hills, AZ






Blue Contours - 2mv/m Daytime
Red Contours - 60dbu(F50-50)

Exhibit 25-D Fountain Hills, AZ Number of Service Contours






KLVK
BLED20100720AIX
Latitude: 33-35-33 N
Longitude: 112-34-49 W
ERP: 30.00 kW
Channel: 206
Frequency: 89.1 MHz
AMSL Height: 1232.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

**Fountain Hills, AZ
Corporate Boundary**

Service Count: KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)

	1
	2
	3
	4
	5 or more

Service Count: KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)

	1
	2
	3
	4
	5 or more

V-Soft Communications LLC® ©

Scale 1:1,500,000

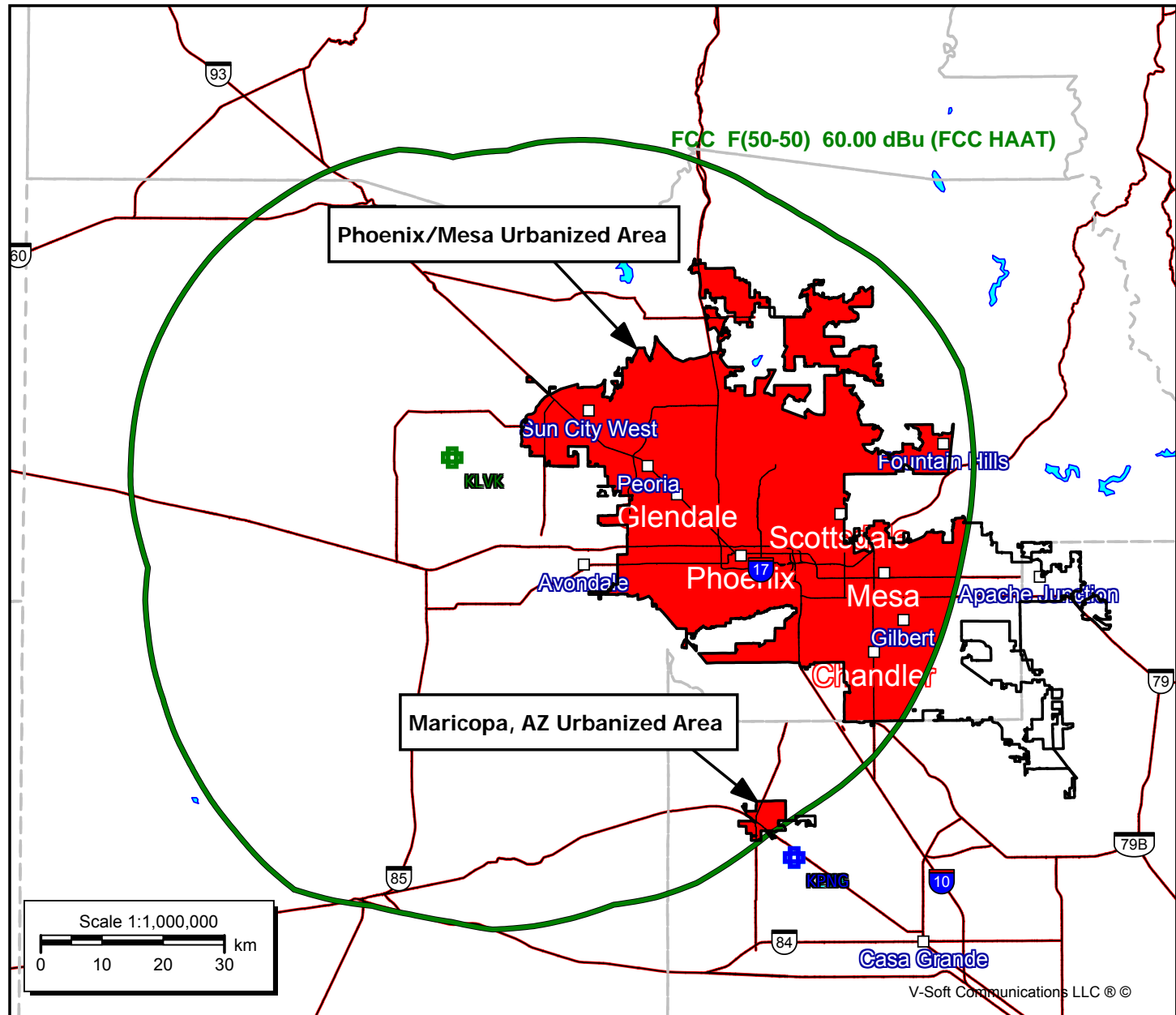
0 20 40 60 km

Scale 1:1,500,000

0 20 40 60 km

Exhibit 25-E KLVK with Urbanized Areas

KLVK
BLED20100720AIX
Latitude: 33-35-33 N
Longitude: 112-34-49 W
ERP: 30.00 kW
Channel: 206
Frequency: 89.1 MHz
AMSL Height: 1232.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None



Urbanized Area Overlap Population Report

V-Soft Communications Population Report

Overlap Population Report

KLVK (206) / Phoenix--Mesa, AZ Urbanized Area

Overlap Area Type: Intersection

Areas Included:

KLVK (206): FCC 60dbuF(50-50) (FCC HAAT)

PGON: Phoenix/Mesa, AZ

Population Database: 2010 US Census (PL)

Total Population: 3,219,295

Overlap Area: 2,533.8

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
KLVK (206): FCC 60dbu F(50-50)	3,586,496	14,144	88.5 %	17.4 %
PGON: Phoenix/Mesa, AZ	3,606,225	2,967.8	89.3 %	85.4 %

Overlap Population Report

KLVK (206) / Maricopa, AZ Urbanized Area

Overlap Area Type: Intersection

Areas Included:

KLVK (206): FCC F(50-50) 60.00 dBu (FCC HAAT)

PGON: Maricopa, AZ Urbanized Area

Population Database: 2010 US Census (PL)

Total Population: 38,094

Housing Units: 15,084

Overlap Area: 30.12 sq. km

Area Description	Total Population	Total Area [sq. km]	Percent Population	Percent Area
KLVK (206): FCC 60dbu F(50-50)	3,586,496	14,144	1.1 %	0.2 %
PGON: Maricopa, AZ Urbanized Area	42,194	35.09	90.3 %	85.8 %

Maricopa, AZ

The FCC has previously determined that Maricopa is a *bona fide* community for allotment purposes. KLVA is currently licensed to Maricopa. Maricopa is a census designated place (“CDP”) with a 2010 population of 43,482. Maricopa continues to maintain relevant residential, social and business characteristics.

Maricopa has its own elected government, which consists of a Mayor, Vice Mayor and Councilmembers. Maricopa also has a City Manager, Clerk, Deputy Clerk, Planning Board, and Zoning Board of Appeals.

Maricopa has its own Post Office and U.S. Postal Service Zip Codes (85138 and 85139).

Maricopa has numerous businesses and commercial establishments within its borders, as well as a number of churches.

Maricopa also has its own chamber of commerce (the Maricopa Area Chamber of Commerce), and public library (the Maricopa Public Library). Maricopa has its own fire department, police department, and transportation system (COMET – City of Maricopa Express Transit).

For more information on the City of Maricopa visit <http://www.maricopa-az.gov/web/>