

**MODIFY BMPH-20080331ACU**  
**CUMULUS LICENSING LLC**  
**KNRQ-FM RADIO STATION**  
**CH 250C1 - 97.9 MHZ - 10.0 KW**  
**ALOHA, OREGON**  
**August 2010**

**EXHIBIT A**

**Clear Allocation Reference Site**

This application seeks to re-allot Channel 250C2 from Tualatin, Oregon to Aloha, Oregon and upgrade to Channel 250C1. As the proposed implementation site does not meet §73.207 spacing requirements to all other facilities, a designated allocation reference site has been identified.<sup>1</sup>

As denoted on Exhibit A1, from the proposed allocation reference site, Channel 250C1 meets the Commission's minimum distance separation requirements to all licensed, proposed or applied for facilities with the exception of the present licensed site for KNRQ-FM at Eugene, Oregon; the permitted site for KNRQ-FM at Tualatin, Oregon; the licensed site of KACI-FM, Channel 249C2, The Dalles, Oregon; the licensed site of station KCYS, Channel 251A, Seaside, Oregon and the vacant, but applied for Channel 251C1 at Madras, Oregon. KACI-FM submitted a minor change application and received a permit to move from Channel 249C2 to Channel 228C2 at The Dalles (BPH-20100505ACB), which was to accommodate the KNRQ-FM upgrade at Tualatin, Oregon. Therefore, KACI-FM is not considered further.

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1) The shortage from the proposed implementation site is addressed under §73.215 of the rules.



As part of this instant application and counterproposal in MB Docket #10-118, Cumulus requests the substitution of Channel 243A for Channel 251A at Seaside, Oregon at the present transmitter site of station KCYS. Further, Cumulus requests that an Order to Show Cause be issued to the licensee of KCYS as to why its license should not be modified to specify operation on Channel 243A.<sup>2</sup> As is indicated on Exhibit A2, Channel 243A meets the Commission's minimum distance separation requirements at the KCYS site, with the exception of the mutually exclusive proposal at Gearhart, Oregon. As this location is the licensed site for KCYS, its coverage of Seaside will not be altered by the channel change. Cumulus states that it will reimburse the licensee of KCYS for reasonable expenses for making the channel change.

In order to provide the requisite clearance to the proposed Channel 250C1 allocation site at Aloha, Oregon, Cumulus also requests the substitution of Channel \*243C1 for the vacant, but applied for Channel \*251C1 at Madras, Oregon. As indicated on Exhibit A3 and A4, Channel \*243C1 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities, at the present Channel \*251C1 allocation site and the pending application sites of the two applicants for Channel \*251C1.<sup>3</sup> Channel \*251C1 is reserved for non-commercial use, but since Channel \*243C1 meets the spacing requirements at the Channel \*251C1 allocation and pending application site, no additional information regarding reservation is provided. The shortage to station KWLZ-FM, Channel 243C, Warm Springs, Oregon is not

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- 2) The use of Channel 243A at Seaside, Oregon conflicts with the proposed use of the channel at Gearhart, Oregon proposed in MB Docket #10-118. In its counterproposal, Cumulus seeks to allot alternate Channel 227A to Gearhart, Oregon, rather than Channel 243A. To accommodate the use of Channel 227A at Gearhart, Oregon, Cumulus further requests that Channel 248C3 be substituted for vacant Channel 228C3 at Manzanita, Oregon. Additional details on these changes are outlined in the technical portion of the counterproposal which is attached as Exhibit E.
  - 3) The Educational Broadcast Service application (BNPED-20100226AIL) was filed at the allocation site for Channel \*251C1.



considered, as the station has received a construction permit to change to Channel 242C3 at West Linn, Oregon (BPH-20070119AAT).<sup>4</sup> Further, the allotment of Channel 244C2 has been deleted by the Commission in a Memorandum Opinion and Order in MB Docket #09-130 (DA 10-1148), adopted June 25, 2010, released June 28, 2010.<sup>5</sup> Each of these proposals are also requested in the separately filed counterproposal.

From the proposed Channel 250C1 allocation reference site at Aloha, Oregon, a maximum Class C1 will place a theoretical 70 dBu signal over 100% of the community of Aloha, Oregon, as shown on Exhibit A5. Further, the proposed allocation site is an existing tower.<sup>6</sup> Therefore, this proposal meets the Commission's allocation criteria.

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- 4) KWLZ-FM is operating pursuant to an implied STA at its site at Warm Springs.
  - 5) The petitioner withdrew interest in the channel after the allotment was made, and also requested that its application be dismissed.
  - 6) There is an existing 189.0 meter tower located at the proposed allocation site, Antenna Structure Registration Number 1033770.

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**EXHIBIT A1**

Allocation Study for KNRQ-FM Aloha, Oregon  
Using Allocation Site as Reference

REFERENCE	CLASS = C1 Int = C1	DISPLAY DATES
45 29 20.0 N.	Current Spacings to 3rd Adj.	DATA 08-04-10
122 41 40.0 W.	Channel 250 - 97.9 MHz	SEARCH 08-04-10

Call	Channel	Location	Ant	Azi Power	Dist HAAT	FCC	Margin
Lat.	Lng.						
AD251	ADD 250C1	Aloha		OR 0.0	0.0	245.0	-245.0
	45 29 20.0	122 41 40.0		100.000 kW	0 M		
	Allocation site for Aloha, Oregon						
KNRQ-FM	CP -N 250C2	Tualatin		OR 313.0	5.5	224.0	-218.5
	45 31 21.0	122 44 45.0	NCX	3.700 kW	470 M		
	Cumulus Licensing LLC			BMPH-20080331ACU			
KNRQ-FM	LIC 250C	Eugene		OR 191.5	168.5	270.0	-101.5
	44 00 08.0	123 06 50.0	EN	100.000 kW	308 M		
	Cumulus Licensing LLC			BLH-19910528KF			
KACI-FM	LIC 249C2	The Dalles		OR 80.3	112.3	158.0	-45.7
	45 38 58.0	121 16 25.0	CX	50.000 kW	271 M		
	Bicoastal Media Licenses Inc. BLH-20071009ABD						
	> to Channel 228C2 per one step application BPH-20100205ACB.						
KCYS	LIC 251A	Seaside		OR 298.5	109.6	133.0	-23.4
	45 57 08.0	123 56 14.0	C	6.000 kW	100 M		
	Dave's Broadcasting Corp.			BLH-20000225AAK			
	> to Channel 243A - Order to Show Cause requested.						
1358321	APP-D 251C1	Madras		OR 111.3	166.6	177.0	-10.4
	44 55 40.0	120 43 40.2	DCX	100.000 kW	149 M		
	Tool Shed PDX			BNPED-20100226AJY			
	> to Channel 243C1 - alternate channel.						
1358487	APP 251C1	Madras		OR 115.0	168.2	177.0	-8.8
	44 50 02.0	120 45 55.0	CX	100.000 kW	300 M		
	Educational Broadcast Serv.			BNPED-20100226AIL			
	> to Channel 243C1 - alternate channel.						
AL6416	VAC 251C1	Madras		OR 115.0	168.2	177.0	-8.8
	44 50 02.0	120 45 55.0		100.000 kW	299 M		
	Madras Broadcasting			RM9961			
	> to Channel 243C1 - alternate channel.						
KOMO-FM	LIC-Z 249C	Oakville		WA 345.9	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	ZCX	63.000 kW	728 M		
	South Sound Broadcasting			BLH-20080514AGI			



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**EXHIBIT A1 (continued)**

Call	Channel	Location	Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	Power	HAAT		
KOMO-FM	APP-D 249C	Oakville	WA 345.9	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	DCX 69.000 kW	701 M		
	South Sound Broadcasting		BMPH-20100602AKM			
KOMO-FM	CP -Z 249C	Oakville	WA 345.9	209.3	209.0	0.31
	47 18 46.0	123 22 15.0	ZCX 63.000 kW	728 M		
	South Sound Broadcasting		BPH-20090626AAO			
1356434	APP 252C3	Dallas	OR 205.5	78.0	76.0	2.0
	44 51 18.0	123 07 15.0	CX 3.200 kW	282 M		
	Capital Community Television		BNPED-20100226AEJ			
1353945	APP 252C3	Dallas	OR 205.5	78.0	76.0	2.0
	44 51 18.0	123 07 15.0	CX 2.780 kW	297 M		
	Mano A Mano Family Center		BNPED-20100225ADD			
VA2391	VAC 252C3	Dallas	OR 217.8	80.1	76.0	4.1
	44 55 06.0	123 19 00.0	N 25.000 kW	100 M		
KPPK	LIC 252A	Rainier	OR 345.3	79.8	75.0	4.8
	46 10 59.0	122 57 29.0	CX 1.600 kW	195 M		
	Bicoastal Media Licenses Inc.		BLH-20060802AFY			
1357368	APP 252C3	Dallas	OR 218.7	82.0	76.0	6.0
	44 54 42.8	123 20 44.2	CX 25.000 kW	100 M		
	Dallas Seventh-day Advent.		BNPED-20100223AAB			
1357190	APP 252C3	Dallas	OR 217.9	84.4	76.0	8.4
	44 53 18.0	123 21 05.0	CX 25.000 kW	59 M		
	Centro Cristiano Vida Abund.		BNPED-20100226ADS			
1357070	APP 252C3	Dallas	OR 217.9	84.4	76.0	8.4
	44 53 18.0	123 21 05.0	CX 25.000 kW	67 M		
	Calvary Chapel Of McMinnville		BNPED-20100222ACK			
1357754	APP 252C3	Dallas	OR 217.9	84.5	76.0	8.5
	44 53 17.4	123 21 09.3	CX 25.000 kW	61 M		
	Hispanic Family Christian		BNPED-20100226AHE			
1358445	APP 252C3	Dallas	OR 227.8	92.0	76.0	16.0
	44 55 52.4	123 33 33.0	CX 0.650 kW	559 M		
	Grace Public Radio		BNPED-20100224ACK			
KING-FM	LIC-D 251C	Seattle	WA 13.6	230.7	209.0	21.7
	47 30 14.0	121 58 29.0	DC 68.000 kW	707 M		
	Classic Radio, Inc.		BLH-20080707AIW			



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**EXHIBIT A2**

Allocation Study for Seaside, Oregon  
Using KCYS Site as Reference

REFERENCE	CLASS = A Int = A	DISPLAY DATES
45 57 08.0 N.	Current Spacings to 3rd Adj.	DATA 08-04-10
123 56 14.0 W.	Channel 243 - 96.5 MHz	SEARCH 08-04-10

Call	Channel	Location	Ant	Azi	Dist	FCC	Margin
	Lat.	Lng.		Power	HAAT		
AD243	ADD 243A	Seaside	OR	0.0	0.0	115.0	-115.0
	45 57 08.0	123 56 14.0		6.000 kW	0 M		
Counterproposal in MB Docket 10-118 - Alternate channel for KCYS							
1369057	RSV 243A	Gearhart	OR	0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0		6.000 kW	100 M		
Black Hills Broadcasting							
> move to Channel 227A - pursuant to counterproposal.							
R13706	ADD 243A	Gearhart	OR	0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0		6.000 kW	100 M		
Black Hills Broadcasting							
> move to Channel 227A - pursuant to counterproposal.							
1368395	APP 243A	Gearhart	OR	0.0	0.1	115.0	-114.9
	45 57 11.0	123 56 14.0	CX	6.000 kW	70 M		
Black Hills Broadcasting BNPH-20100513AAZ							
> move to Channel 227A - pursuant to counterproposal.							
KCRF-FM	LIC 244C1	Lincoln City	OR	183.8	133.2	133.0	0.22
	44 45 22.0	124 02 57.0	C	19.500 kW	266 M		
Pacific West Broadcasting BLH-20010827AAA							
KJAQ	LIC-N 243C	Seattle	WA	40.3	229.0	226.0	3.0
	47 30 17.0	121 58 03.0	NC	52.000 kW	696 M		
CBS Radio Holdings Inc. BLH-20060710ABP							
KYCH-FM	LIC 246C	Portland	OR	117.7	109.6	95.0	14.6
	45 29 20.0	122 41 40.0	CY	100.000 kW	386 M		
Entercom Portland License BLH-19900821KA							
KWLZ-FM	LIC 243C	Warm Springs	OR	119.4	245.2	226.0	19.2
	44 50 24.0	121 13 56.0	CN	100.000 kW	332 M		
Horizon Broadcasting Group BLH-19860127KG							
KWLZ-FM	CP -Z 242C3	West Linn	OR	117.7	109.6	89.0	20.6
	45 29 20.0	122 41 40.0	ZCX	2.900 kW	297 M		
Horizon Broadcasting Group BPH-20070119AAT							
KTIL-FM	LIC 240A	Bay City	OR	178.6	54.0	31.0	23.0
	45 27 59.0	123 55 11.0	CX	0.450 kW	360 M		
Alexandra Communications BLH-20050908ABX							



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**EXHIBIT A3**

Allocation Study for Madras, Oregon  
Using Present Allocation Site as Reference

REFERENCE		DISPLAY DATES
44 50 02.0 N.	CLASS = C1	DATA 08-04-10
120 45 55.0 W.	Current Spacings to 3rd Adj.	SEARCH 08-04-10
----- Channel 243 - 96.5 MHz -----		

  

Call	Channel	Location	Ant	Azi	Dist	FCC	Margin
Lat.	Lng.			Power	HAAT		
AD243	ADD 243C1	Madras	OR	0.0	0.0	245.0	-245.0
	44 50 02.0	120 45 55.0		100.000 kW	0 M		
Alternate channel - Allocation site/Educational Broadcast Service site							
AD243	ADD 243C1	Madras	OR	15.8	10.8	245.0	-234.2
	44 55 40.0	120 43 40.2		100.000 kW	0 M		
Alternate channel - Tool Shed PDX site							
KWLZ-FM	LIC 243C	Warm Springs	OR	271.2	36.9	270.0	-233.1
	44 50 24.0	121 13 56.0	CN	100.000 kW	332 M		
Horizon Broadcasting Group BLH-19860127KG							
> to Channel 242C3 West Linn, OR - One-step application BPH-20070119AAT							
1279916	RSV 244C2	Maupin	OR	325.6	45.8	158.0	-112.2
	45 10 24.0	121 05 43.0		50.000 kW	150 M		
Maupin Brordcasting Company							
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010							
AL8304	VAC 244C2	Maupin	OR	325.6	45.8	158.0	-112.2
	45 10 24.0	121 05 43.0		50.000 kW	150 M		
Maupin Broadcasting Company RM-11538							
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010							
1277255	APP 244C2	Maupin	OR	325.6	45.8	158.0	-112.2
	45 10 24.0	121 05 43.0	CX	50.000 kW	-62 M		
Maupin Brordcasting Company BNPH-20081107AEN							
> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010							
KWLZ-FM	CP -Z 242C3	West Linn	OR	296.4	168.2	144.0	24.3
	45 29 20.0	122 41 40.0	ZCX	2.900 kW	297 M		
Horizon Broadcasting Group BPH-20070119AAT							
AL8587	VAC 240A	Goldendale	WA	1.5	104.1	75.0	29.1
	45 46 12.0	120 43 48.0		6.000 kW	100 M		
Klickitat Broadcasting RM11142							
KJAQ	LIC-N 243C	Seattle	WA	343.1	311.1	270.0	41.1
	47 30 17.0	121 58 03.0	NC	52.000 kW	696 M		
CBS Radio Holdings Inc. BLH-20060710ABP							
KFLS-FM	LIC 243C	Tulelake	CA	193.3	312.0	270.0	42.1
	42 05 50.0	121 37 59.0	CN	20.000 kW	657 M		
Wynne Enterprises LLC BLH-19951103KF							



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**EXHIBIT A4**

Clearance Study for Madras, Oregon  
Using Proposed Tool Shed Site as Reference

REFERENCE								
44 55 40.0 N.				CLASS = C1		DISPLAY DATES		
120 43 40.2 W.				Current Spacings to 3rd Adj.		DATA 08-04-10		
----- Channel 243 - 96.5 MHz -----						SEARCH 08-04-10		

  

Call	Channel	Location	Azi	Dist	FCC	Margin
	Lat.	Lng.	Ant	Power	HAAT	
AD243	ADD 243C1	Madras	OR	0.0	0.0	245.0 -245.0
	44 55 40.0	120 43 40.2		0.000 kW	0 M	
	Alternate channel Tool Shed PDX site					
AD243	ADD 243C1	Madras	OR	195.8	10.8	245.0 -234.2
	44 50 02.0	120 45 55.0		0.000 kW	0 M	
	Alternate channel - Allocation/Educational Broadcast System site					
KWLZ-FM	LIC 243C	Warm Springs	OR	256.4	41.0	270.0 -229.0
	44 50 24.0	121 13 56.0	CN	100.000 kW	332 M	
	Horizon Broadcasting Group BLH19860127KG					
	> to Channel 242C3 West Linn, OR - One-step application BPH-20070119AAT					
1279916	RSV 244C2	Maupin	OR	313.5	39.8	158.0 -118.2
	45 10 24.0	121 05 43.0		50.000 kW	150 M	
	Maupin Brordcasting Company					
	> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010					
AL8304	VAC 244C2	Maupin	OR	313.5	39.8	158.0 -118.2
	45 10 24.0	121 05 43.0		50.000 kW	150 M	
	Maupin Broadcasting Company RM11538					
	> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010					
1277255	APP 244C2	Maupin	OR	313.5	39.8	158.0 -118.2
	45 10 24.0	121 05 43.0	CX	50.000 kW	-62 M	
	Maupin Broadcasting Company BNPH20081107AEN					
	> Channel deleted pursuant to MO&O MB Docket 09-130 - Released 06/28/2010					
AL8587	VAC 240A	Goldendale	WA	359.9	93.6	75.0 18.6
	45 46 12.0	120 43 48.0		6.000 kW	100 M	
	Klickitat Broadcasting RM11142					
KWLZ-FM	CP -Z 242C3	West Linn	OR	292.7	166.6	144.0 22.6
	45 29 20.0	122 41 40.0	ZCX	2.900 kW	297 M	
	Horizon Broadcasting Group BPH20070119AAT					
KJAQ	LIC-N 243C	Seattle	WA	342.0	302.0	270.0 32.0
	47 30 17.0	121 58 03.0	NC	52.000 kW	696 M	
	CBS Radio Holdings Inc. BLH20060710ABP					



**Allocation Site**

Latitude: 45-29-20 N  
Longitude: 122-41-40 W  
ERP: 100.00 kW  
Channel: 250C1  
Frequency: 97.9 MHz  
AMSL Height: 392.87 m  
Horiz. Pattern: Omni  
Prop Model : None  
70 dBu pop. : 1,910,163 (2000)  
70 dBu area : 7,853.9 sq. km.

**Graham Brock, Inc. - Broadcast Technical Consultants**

70 dBu (3.16 mV/m) radius

Aloha, Oregon

**EXHIBIT A5**  
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Scale 1:1,000,000  
0 20 40 60 km

