

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.¹

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.

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.² 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 *251C1.³ 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

-
- 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).⁴ 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, 2010.⁵ 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.⁶ Therefore, this proposal meets the Commission's allocation criteria.

-
- 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.

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

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. | | SEARCH 08-04-10 |
| ----- Channel 250 - 97.9 MHz ----- | | |

| 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 | | | | | | |

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

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 | | | |

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

EXHIBIT A3

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

REFERENCE 44 50 02.0 N. CLASS = C1 DISPLAY DATES 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 | Azi | Dist | FCC | Margin |
|---------|---|--------------|---------------|-------|-------|--------|
| Lat. | Lng. | Ant | 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 BNPB-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 | | | | | |

Graham Brock, Inc. - Broadcast Technical Consultants

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.

70 dBu (3.16 mV/m) radius

Aloha, Oregon

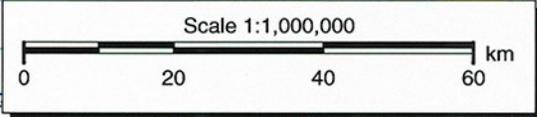


EXHIBIT A5
MODIFY BMPH-20080331ACU
CUMULUS LICENSING LLC
KNRQ-FM RADIO STATION
CH 250C1 - 97.9 MHz - 10.0 KW
ALOHA, OREGON
August 2010

