

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Application of)	
)	
RADIO TRAINING NETWORK, INC.)	File No. 0000185226
)	Facility ID No. 62206
Application for Minor Modification of)	
the Licensed Facilities of WPHH-FM)	
at Hope Hull, Alabama)	

To: The Office of the Secretary
Attention, Media Bureau, Audio Division

**REPLY TO OPPOSITION TO
INFORMAL OBJECTION**

WKLF LLC ("WKLF"), licensee of Radio Station WKLF-AM (Facility ID No. 61222) at Clanton, Alabama, hereby submits this Reply to the "Opposition to Informal Objection" filed by Radio Training Network, Inc. (RTN") regarding the above-captioned minor modification application for Radio Station WPHH-FM at Hope Hull, Alabama.

RTN objects to WKLF's use of U.S. Postal Service zip code boundaries to establish the city boundaries of the unincorporated community of Hope Hull, Alabama. But here, where there is an unincorporated community that is not a U.S. Census Designated Area, the use of a zip code boundary is more reliable than using a community boundary that was manufactured in 2012 for the convenience of an FCC application. The community boundary that was depicted in 2012 is completely unsubstantiated – there is absolutely no evidence that the depicted boundary was

legally acceptable to any local or state entity or agency. The FCC's reliance of such boundary in 2012 was questionable, at best.

There is no doubt that a community's boundary would be more definite if such an area was incorporated. But, that is not the situation here, and the FCC should consider all relevant information and data in trying to define the boundaries of an unincorporated community.

The use of zip code and zip code plus four information has been used by the FCC elsewhere in defining communities and franchise areas, so it is not inappropriate to consider such information here. *See e.g., Time Warner Cable Inc., Memorandum Opinion and Order, DA 08-875 (April 15, 2008).*

The current licensed 70 dBu contour of WPHH covers 80% of the zip code area and the homes and businesses that have Hope Hull addresses. If the FCC allows this modification application to be granted and implemented, 9,901 people will lose their local audio service provided by WPHH. Such a change is not in the public interest. *See, attached Technical Statement and supporting contour map.*

Although the pending WPHH modification application indicates an increase in population served within the new proposed city-grade contour this population gain comes from the Montgomery, Alabama urbanized area at the expense of the loss of 9,901 people within the current rural area. Therefore, it is obvious that this modification will not benefit the community of Hope Hull at all.¹

¹ In 2005, the Hyundai corporation built an automobile assembly plant in Hope Hull which created about 3,000 jobs and caused that portion of the community to develop new homes and businesses. It is this very area of Hope Hull that would lose WPHH service if the proposed modification application is granted and implemented.

All in all, the Commission should find that the public interest would be served best by denying the proposed modification application.

Respectfully submitted,

WKLF LLC

Cary S. Tepper

By: _____
Cary S. Tepper
Communications Counsel

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April 25, 2022

April 22, 2022

RE: WKLF LLC Informal Objection to Radio Training Network, Inc. for WPHH-FM at Hope Hull, AL. Application file No. 0000185226

To Whom It May Concern,

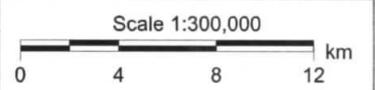
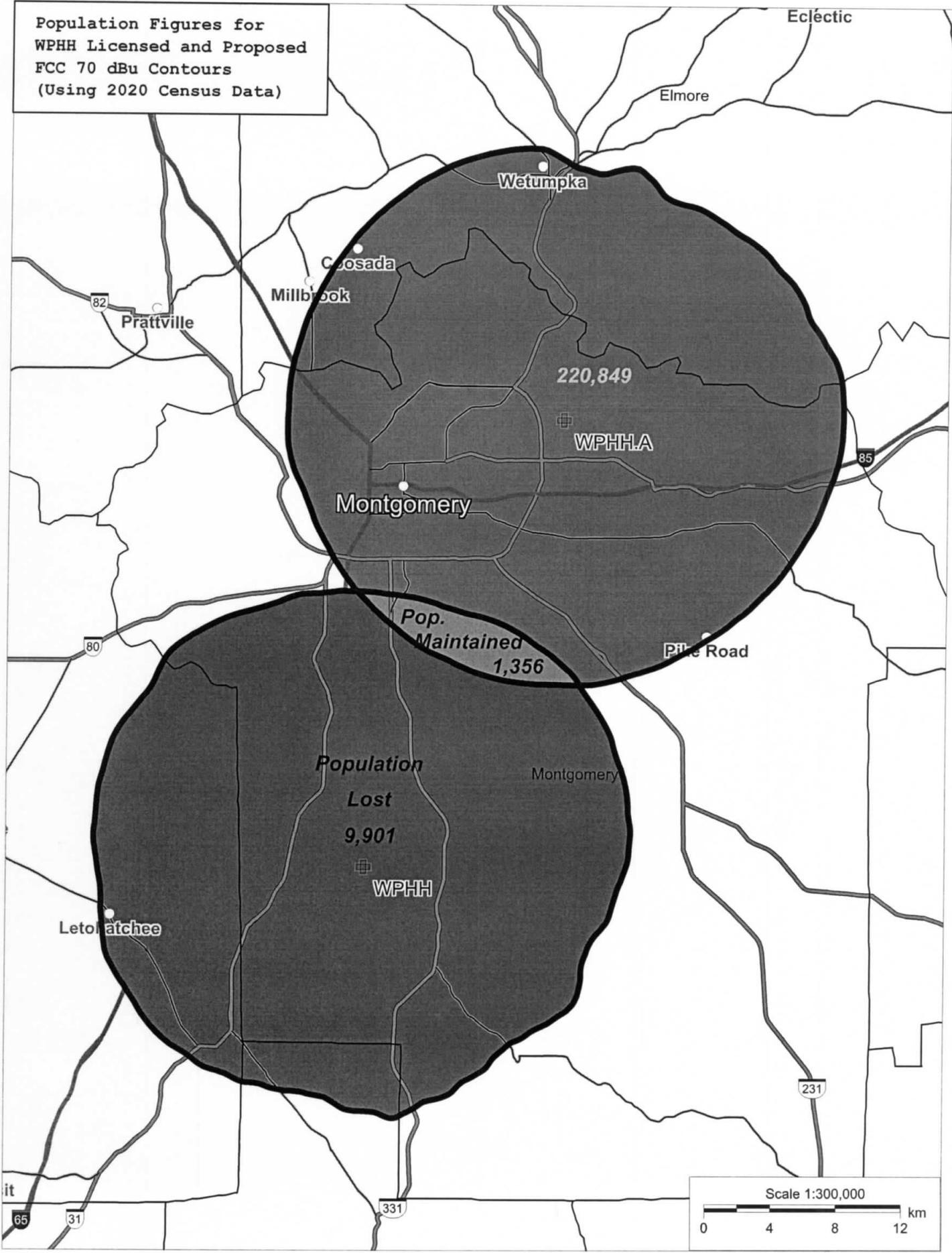
I Christopher W Johnson have prepared contour map of the current WPHH Fac. ID 62206 Hope Hull, AL 70 dB μ contour and the 70 dB μ of their application File No. 0000185226. All population numbers are taken from the 2020 Census Data and are correct as of today April 22, 2022.

I certify that I Christopher W Johnson holder of an FCC General Class license and a SBE certified Broadcast engineer with over 50 years experience and is in good standing with the FCC.

Respectfully,
Christopher W Johnson

Christopher W Johnson
1925 Lay Dam Road
Clanton, Alabama
205-646-4943

Population Figures for
WPHH Licensed and Proposed
FCC 70 dBu Contours
(Using 2020 Census Data)



CERTIFICATE OF SERVICE

I, Cary S. Tepper, do hereby certify that a copy of the foregoing Reply to Opposition to Informal Objection, this 25th day of April, 2022, been sent via email to the following:

Mr. James Bradshaw, Deputy Division Chief
Audio Division-Media Bureau
Federal Communications Commission
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Washington, DC 20554
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Cary S. Tepper

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