

MODIFY BMPH-20070119ADH
CUMULUS LICENSING LLC
NEW FM RADIO STATION
CH 266A - 101.1 MHZ - 0.2 KW
PARACHUTE, COLORADO
December 2007

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC (“Cumulus”), permittee of a New FM station on Channel 267C3 at Parachute, Colorado (BMPH-20070119ADH). Cumulus is proposing to modify its outstanding permit to relocate the station, downgrade to Class A, and change to first adjacent Channel 266. As noted on Exhibit A, the proposed channel meets the Commission’s minimum distance separation requirements to all full service licensed, proposed or applied for facilities.¹ This change is needed to allow Cumulus to construct the facility before the expiration of the underlying permit. Due to the need for tower construction at the present CP site and the winter conditions in Colorado, it is feared that the construction could not be completed before the expiration of the permit.²

Cumulus is proposing to implement this change at an existing location. The proposed location is an existing building on which a tower section will be installed to accommodate the New FM antenna. The combination of the existing building height and short tower will keep the

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- 1) It is noted that LPFM station KSBP-LP, Channel 266L1, Parachute, Colorado is located at the site specified in this application (the licensed coordinates for the LPFM indicate the station is located elsewhere; this will be addressed in an application for the LPFM station). Both the permit for the New FM and this instant modification will cause KSBP-LP to be displaced off Channel 266. The licensee of KSBP-LP is submitting an application to transition to Channel 280L1. As such, KSBP-LP will be able to continue operation.
 - 2) It is Cumulus’s intention to seek an upgrade to Channel 267C3, following the filing of a license to cover the facilities proposed herein.

overall structure height below 200 feet above ground. As such, the Federal Aviation Administration was not apprised of this proposal and no tower registration is necessary.³

The proposed New FM antenna is located atop an occupied building, at which there will also be a LPFM station. As such, attached as Exhibit B is a study which shows the proposed New FM is in compliance with the RF exposure limits.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Cumulus and is available to the Commission upon request.⁴

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- 3) Based on the Commission's TOWAIR program, the building/tower combination meets the required slope test to all nearby airports. As such, no tower registration appears to be necessary.
 - 4) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All other necessary reviews have been, or will be, addressed by the applicant. Should any analysis indicate there are environmental issues, the issues will be addressed and the ultimate findings reported to the Commission before any tower construction is undertaken.