

**Minor Change Application  
Community Change Request  
WKZP(FM) Ch 240B1 95.9 MHz  
Facility ID No.: 4674  
Bethany Beach, Delaware to West Ocean City, Maryland  
May 2016**

Allocation Location Technical Narrative

This technical narrative and accompanying Figures have been prepared in support of an application for the minor modification of WKZP(FM), 240B1 Bethany Beach, Delaware for operation on channel 240B1 at West Ocean City, Maryland.

No change in technical facilities is being requested in this application.

As the requested modification is mutually exclusive with the current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a) (i) and 73.3573(g).

The following is a summary of the merits of this modification:

- The community of West Ocean City, Maryland (2010 Census population 4,375 persons) will be provided with its first local aural transmission service.
- The community of Bethany Beach, Delaware (2010 Census population 1,060 persons) will continue to be well served by another aural reception service, specifically, WJKI(FM).
- The 60 dBu area associated with the proposed operation on channel 240B1 at West Ocean City, Maryland, encompasses 174,593 persons and an area of 4,540 sq. km.
- The 70 dBu area associated with the proposed operation on channel 240B1 at West Ocean City, Maryland, encompasses 79,486 persons and an area of 1,586 sq. km.

- The proposed channel 240B1 allotment site for West Ocean City, Maryland satisfies the Commission's allocations spacing rules for a fully spaced, full 25 kilowatt ("kW") Class B1 facility.<sup>1</sup>
- The community of West Ocean City, Maryland, will be provided protected service from 21 stations in addition to WKZP(FM).

### *Proposed Change to the Facility*

The current community of license of WKZP(FM) is Bethany Beach, Delaware, which is located in Sussex County, and has a 2010 U.S. Census population of 1,060 persons.

The proposed community of license of WKZP(FM) is West Ocean City, Maryland, which is located in Worcester County, and has a 2010 U.S. Census population of 4,375 persons. West Ocean City, Maryland has no local FM or AM aural transmission broadcast service and, therefore, the proposed modification would bring a first local aural transmission service to West Ocean City, Maryland.

### *Compliance With FCC Rules*

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 240B1 at West Ocean City, Maryland. The site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments as a full 25 kW Class B1 allotment, except for the existing channel 240B1 allotment at Bethany Beach, Delaware for which this proposal is a mutually exclusive substitute.

No new short spacings will be created, nor are any exacerbated, as no change in technical facilities is requested.

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<sup>1</sup> The proposed allotment reference coordinates are 38° 24' 58.7" North, 75° 03' 23.5" West. This is an existing broadcast location with Antenna Structure Registration Number 1034157. Also, see *Figure 1* accompanying this Exhibit for the allocations spacing study.

Operation from the channel 240B1 allotment site provides the requisite city grade (70 dBu) signal to West Ocean City, Maryland, utilizing the provisions of 47 C.F.R. Section 73.313. *Figure 2* is a map which depicts the city grade coverage (70 dBu) contour based on maximum Class B1 facilities (ERP 25 kW/HAAT 100 meters) at the allotment site. As shown, all (100%) of West Ocean City, Maryland is located within the predicted 70 dBu contour.

#### *Urbanized Area Considerations*

Bethany Beach, Delaware, and West Ocean City, Maryland, are communities located outside any Urbanized Area. There is no apparent way the facility could be relocated to serve 50 percent or more of an urbanized area.

#### *Services to Community*

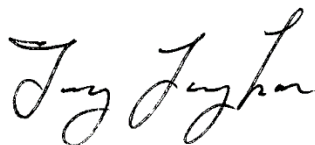
The community of West Ocean City, Maryland, will be provided protected service from 21 other stations as demonstrated in *Figures 3 and 4*.

#### *Coverage Contours*

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions, and compliance with Section 73.315 community coverage contour is being demonstrated utilizing the standard method.

#### *Conclusion*

The community of license of WKZP(FM) may be changed to channel 240B1 at West Ocean City, Maryland, in compliance with all applicable Commission rules. The community of West Ocean City, Maryland, would be provided with a first local aural transmission service, and the community of Bethany Beach, Delaware will continue to be served by WJKI(FM). Therefore, the applicant requests a minor modification specifying operations of WKZP(FM) on channel 240B1 at West Ocean City, Maryland.

A handwritten signature in black ink, appearing to read "Troy Langham". The script is cursive and fluid, with the first name "Troy" and last name "Langham" clearly distinguishable.

Troy Langham  
FCC Engineering Supervisor  
iHeartMedia

June 2, 2016

Figure 1. Spacing Study at Allotment Reference Site.

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                                WKZP Allocation Location at West Ocean City, MD
                                Capstar Tx, LLC

REFERENCE                      CLASS = B1                      DISPLAY DATES
38 24 58.7 N.                  DATA 05-25-16
75 03 23.5 W.                  SEARCH 05-25-16
----- Channel 240 - 95.9 MHz -----

Call      Channel  Location      Azi      Dist      FCC      Margin
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WKZP      LIC-N 240B1 Bethany Beach  DE 275.2    7.29  174.5  -167.2
WKDB      LIC   237A  Laurel        DE 280.6   53.62   47.5    6.1
WROX-FM   LIC   241B  Exmore         VA 213.5  153.23  144.5    8.7
WCTG      LIC   243A  Chincoteague  VA 207.6   62.11   47.5   14.6
WWIN-FM   LIC   240A  Glen Burnie    MD 304.3  157.81  142.5   15.3
WTHH      LIC-N 241A  Margate City   NJ  25.9   118.77   95.5   23.3
WBEN-FM   LIC   239B  Philadelphia    PA 355.1  180.83  144.5   36.3
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                                All separation margins include rounding

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Figure 2. Proposed 60 and 70 dBu Contour Service

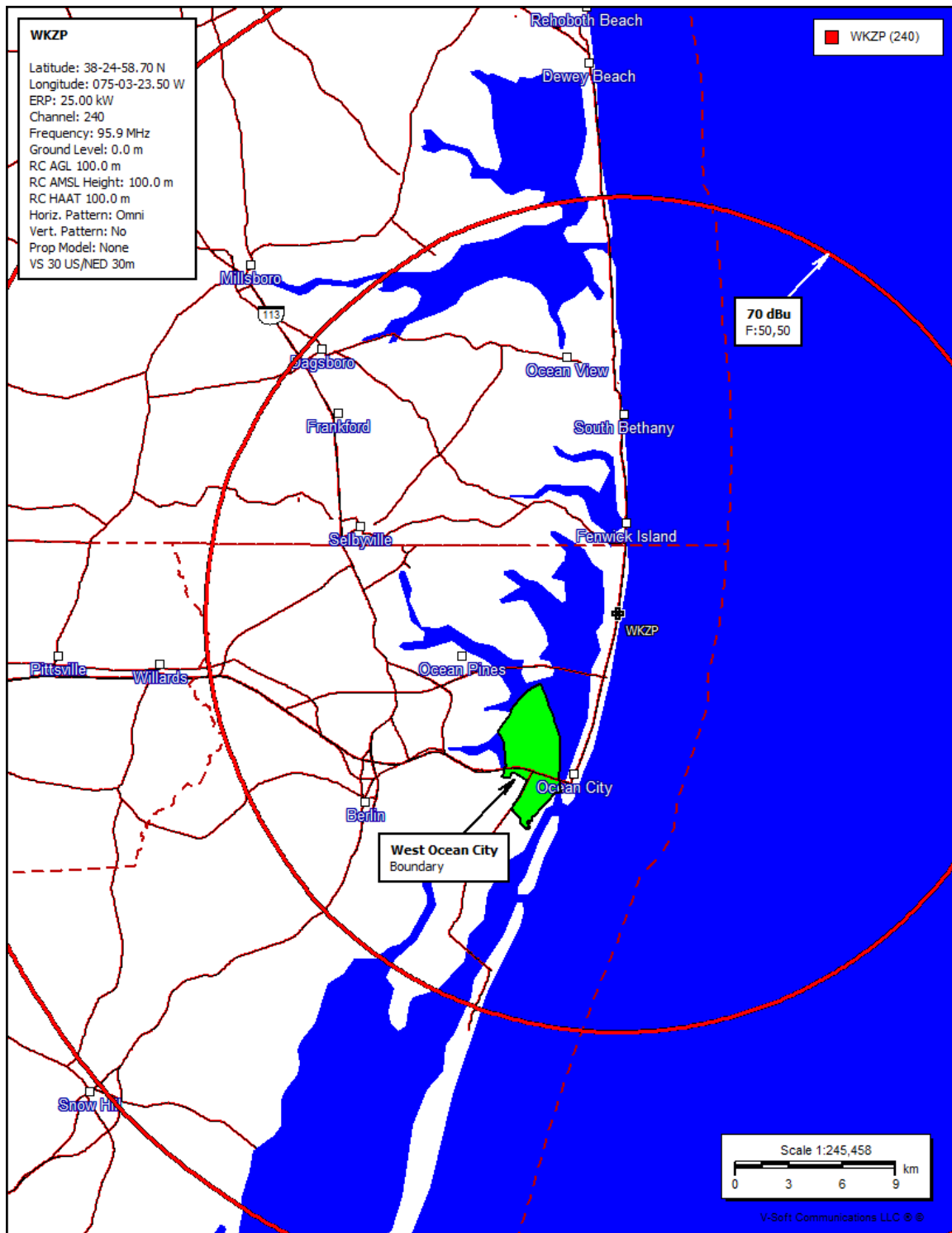
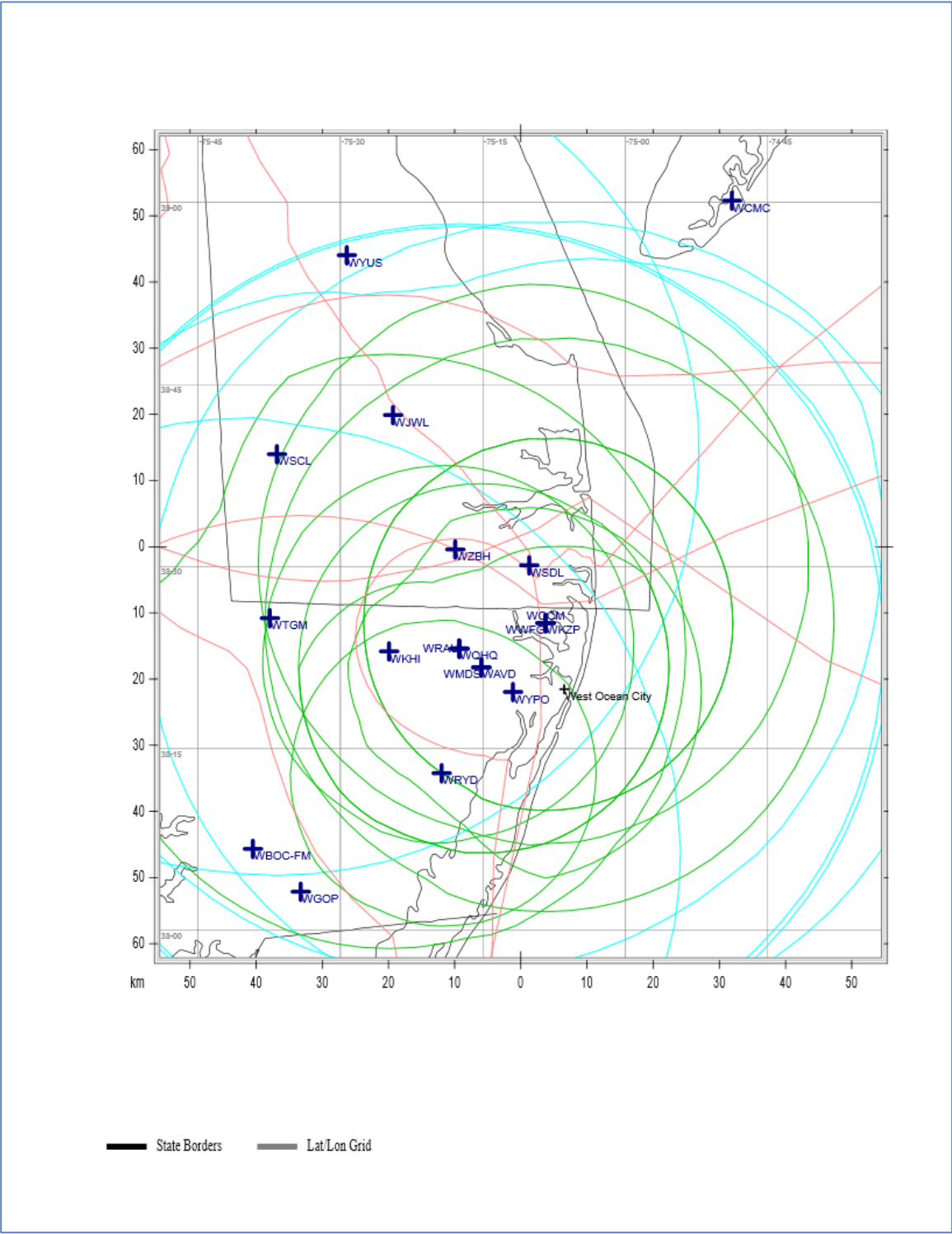


Figure 3. Map of Protected AM and FM Services.



*Figure 4. Tabulation of Protected AM and FM Services to community.*

<b>Call Sign</b>	<b>Fac_id</b>	<b>Band</b>	<b>City</b>	<b>State</b>
WKZP	4674	FM	BETHANY BEACH	DE
WOCM	2200	FM	SELBYVILLE	DE
WQHQ	28166	FM	OCEAN CITY-SALISBURY	MD
WYPO	29564	FM	OCEAN CITY	MD
WRAU	81959	FM	OCEAN CITY	MD
WWFG	74179	FM	OCEAN CITY	MD
WZBH	25003	FM	MILLSBORO	DE
WKHI	4107	FM	FRUITLAND	MD
WSDL	83090	FM	OCEAN CITY	MD
WAVD	53490	FM	OCEAN PINES	MD
WSCL	58660	FM	SALISBURY	MD
WLBW	28170	FM	FENWICK ISLAND	DE
WBOC-FM	39894	FM	PRINCESS ANNE	MD
WMDS	198742	FM	NEWARK	MD
WOCQ	47107	FM	BERLIN	MD
WRYD	88291	FM	SNOW HILL	MD
WIJK	41484	AM	OCEAN CITY	MD
WJWL	25007	AM	GEORGETOWN	DE
WYUS	53483	AM	MILFORD	DE
WTGM	28165	AM	SALISBURY	MD
WGOP	5347	AM	POCOMOKE CITY	MD
WCMC	70259	AM	WILDWOOD	NJ