

Exhibit 30 – Statement A
NATURE OF THE PROPOSAL

prepared for
CBS Radio Annapolis LLC
WLZL(FM) College Park, Maryland
Ch. 300B 49 kW 151.1 m

CBS Radio Annapolis LLC (“*CBS Radio*”) is the licensee¹ of WLZL(FM)(Ch. 300B, Annapolis, MD). *CBS Radio* is presently authorized² to make slight changes to the WLZL antenna height, antenna pattern, and effective radiated power (“ERP”). In the instant application, *CBS Radio* seeks to modify Construction Permit BPH-20121204AEJ (the “Current CP”) by changing the WLZL community of license to College Park, Maryland as a minor modification.³

CBS Radio only proposes to change the community of license of WLZL. The station will remain at its current transmitter site. With no proposed change to the authorized site, ERP, antenna height, or directional antenna pattern, the WLZL contour locations will not change. Therefore:

- The allocations study that was the basis for the Current CP application remains accurate.
- There are no areas of coverage gain, loss, or number of available services to consider for this proposal.
- The proposed facility is mutually-exclusive with the licensed and authorized facilities.

The proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

WLZL operates under the grandfathering provisions of §73.213(a) with respect to first-adjacent stations WGTY⁴ and WWWT-FM⁵. §73.213(a)(4) applies in the case of third-adjacent

¹ FCC File Number BMLH-20110708ACE.

² See BPH-20121204AEJ.

³ CBS Radio also proposes to specify a different antenna model than in the Current CP.

⁴ Ch. 299B, Gettysburg, PA.

⁵ Ch. 299B, Manassas, VA.

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station WRQX⁶. Other facilities that are shortspaced to WLZL requested processing under the FCC's Contour Protection Rule, §73.215.⁷ Because WLZL was in compliance with the Rules when initially authorized, the instant proposal complies with the FCC's policy regarding community-of-license modifications with respect to those stations.⁸

As shown in the coverage map provided as **Exhibit 30 – Figure 1**, the proposed principal community of College Park is encompassed by WLZL's proposed 70 dBμ coverage contour. A detailed study of WLZL interference areas was provided in the Current CP application. The interference area nearest to College Park, MD is that of grandfathered, short-spaced WWWT-FM, Manassas, VA, plotted in **Exhibit 30 - Figure 2**. The WLZL and WWWT-FM facilities are located on opposite sides of the Washington, DC Urbanized Area, each with extensive areas of protected and interfering contour overlap. As shown, no interference is predicted within the proposed principal community.

The proposed WLZL facility covers 18.1% of the Washington, DC Urbanized Area with a principal community contour. The following study demonstrates that the proposed change in principal community would not facilitate a subsequent WLZL modification capable of increasing Washington, DC Urbanized Area coverage to or near 50% through a minor modification application. Therefore, the instant proposal is for local service to College Park and not to the entire Urbanized Area.

According to FCC Rule §73.213(a), which stipulates interference protection for first-adjacent, grandfathered, shortspaced stations such as WWWT-FM, any WLZL facility change that would increase interference within the WWWT-FM protected contour is prohibited. As

⁶ Ch. 297B, Washington, DC.

⁷ See BPH-20120723AEM for WKHI, Fruitland, MD; BPH-20041207ABT for WPHI-FM, Pennsauken, NJ; and BPH-20050427ABM for WBQK, West Point, VA.

⁸ See **Exhibit 36**.

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shown in **Exhibit 30 – Figure 3** by the blue line, the WWWT-FM protected contour covers more than half⁹ of the Washington, DC Urbanized Area.¹⁰ Any extension of WLZL principal community coverage¹¹ over the Washington, DC Urbanized Area would also extend the WLZL interfering contour¹² over WWWT-FM, which is prohibited. Therefore, because the WLZL principal community contour cannot be extended over the Washington, DC Urbanized Area without violating the interference protection requirements of §73.213(a), 50% coverage of this region is effectively blocked.

Under the proposal, stations WYRE(AM), WNAV(AM), and WMPT(TV) would remain licensed to Annapolis, Maryland in the Baltimore, Maryland Urbanized Area. WLZL would be the first local transmission service to College Park.¹³

⁹ The WWWT-FM protected contour covers 1,854 km² or 53.1% of the 3,491 km² Washington, DC Urbanized Area.

¹⁰ The Washington, DC Urbanized Area (Census 2010) is shown in tan shading in **Exhibit 30 - Figure 3**.

¹¹ The proposed WLZL principal community contour is plotted in black in **Exhibit 30 - Figure 3**.

¹² The proposed WLZL interfering contour is plotted in red in **Exhibit 30 - Figure 3**.

¹³ WMUC-FM College Park, MD is a secondary, Class D station.

EXHIBIT 30 - FIGURE 1
PROPOSED FACILITY COVERAGE CONTOURS

prepared September 2013 for
CBS Radio Annapolis LLC
WLZL(FM) Ch. 300B College Park, MD

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

FCC Method Contours
54 dBu F(50, 50)
70 dBu F(50, 50)

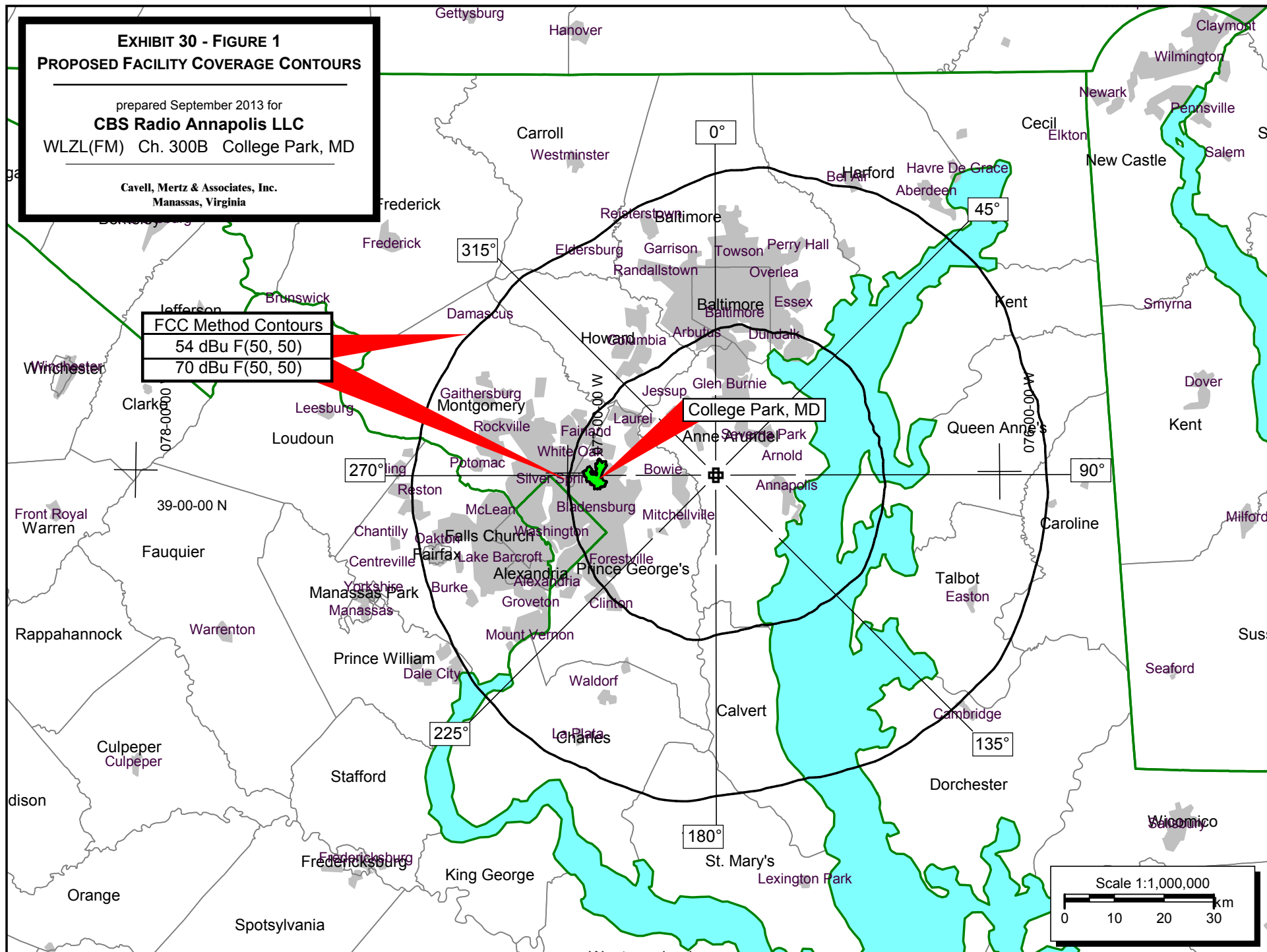


EXHIBIT 30 - FIGURE 2
WLZL PREDICTED INTERFERENCE
FROM LICENSED WWWT-FM

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WLZL(FM) College Park, MD
Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

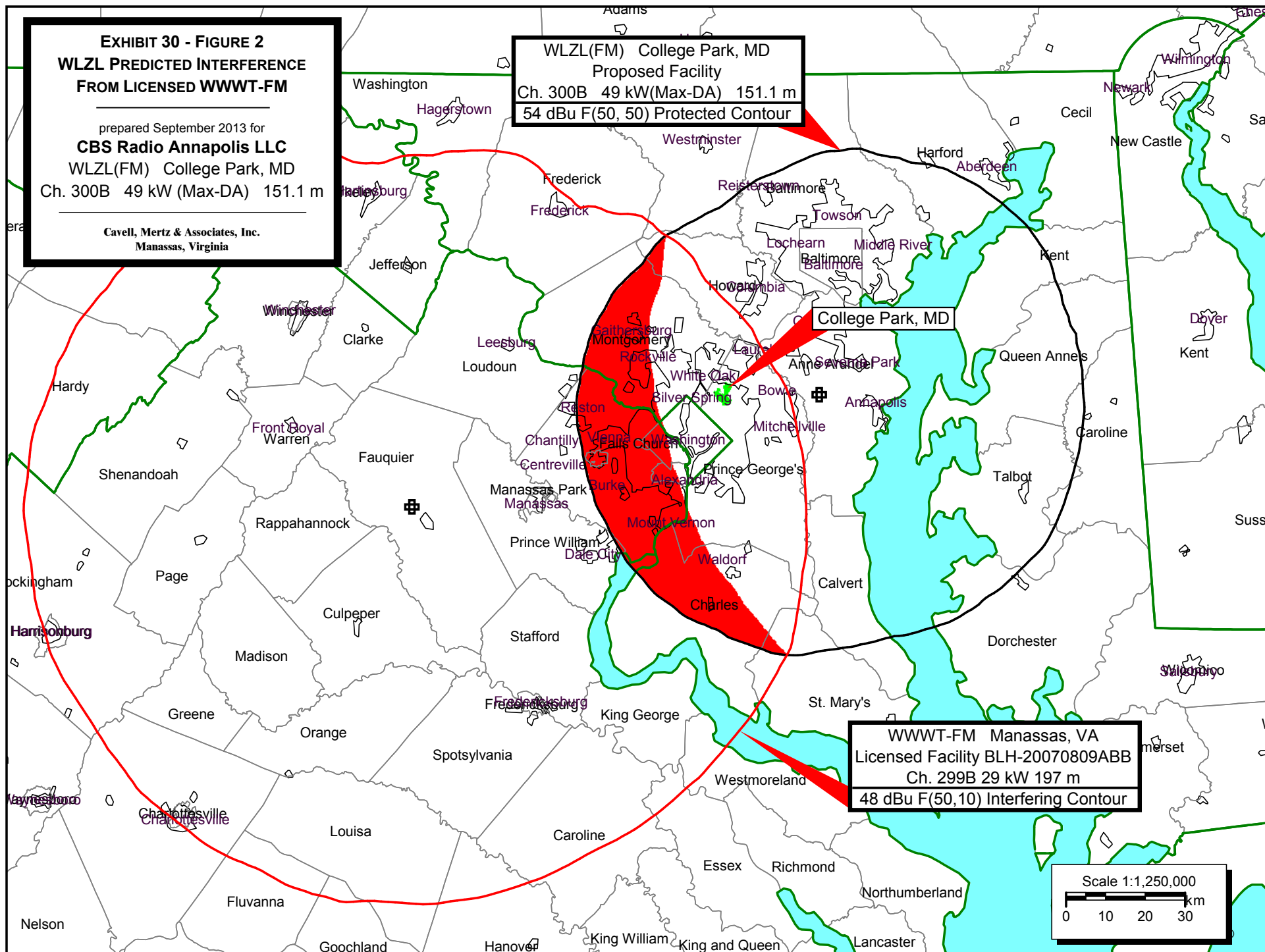
WLZL(FM) College Park, MD
Proposed Facility
Ch. 300B 49 kW(Max-DA) 151.1 m
54 dBu F(50, 50) Protected Contour

College Park, MD

WWWT-FM Manassas, VA
Licensed Facility BLH-20070809ABB
Ch. 299B 29 kW 197 m
48 dBu F(50,10) Interfering Contour

Scale 1:1,250,000

0 10 20 30 km



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CBS Radio Annapolis LLC
 WLZL(FM) College Park, MD
 Ch. 300B 49 kW (Max-DA) 151.1 m

Washington, DC Urbanized Area
(Brown Shading)

WLZL(FM) College Park, MD
Proposed Facility
Ch. 300B 49 kW(Max-DA) 151.1 m
100 u F(50, 50) Principal Community Contour
48 dBu F(50, 10) Interfering Contour

WWWT-FM Manassas, VA Licensed Facility BLH-20070809ABB Ch. 299B 29 kW 197 m 54 dBu F(50,50) Protected Contour
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