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Audio Div. 1220 Division

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By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

Accepted/Files

MAY 12 2016

Federal Communications Commission
Office of the Secretary

**Attention: Audio Division,
Media Bureau**

**Re: CC Licenses, LLC, FRN: 0014042816
WBZY(FM), Bowdon, Georgia, Facility ID No. 63406
Request for Main Studio Location Compliance Determination**

Dear Ms. Dortch:

On behalf of CC Licenses, LLC ("CCL"), the licensee of WBZY(FM), Bowdon, Georgia, Facility ID No. 63406 (the "Station"), this letter is to request that the Commission confirm that the proposed relocation of the Station's main studio to 1819 Peachtree Road NE, Atlanta, Georgia 30309, complies with the main studio location requirements of 47 C.F.R. Section 73.1125(a)(2), as established by the attached Technical Statement employing Longley-Rice methodology.

Please direct communications regarding this submission to the undersigned in addition to the licensee.

Respectfully submitted,

REPP LAW FIRM

Marissa G. Repp

Attorney for CC Licenses, LLC

Attachment

cc: WBZY(FM) Public Inspection File

Technical Statement

Facility ID Number 63406

Studio Rule Compliance Determination Request

This technical statement has been prepared in support of a request for Determination of Compliance with the Main Studio Rule, Section 73.1125 for Station WBZY, Bowdon, Georgia. This Technical Exhibit demonstrates that the proposed main studio location is within the 70 dBu field strength contour of the permitted facility as required by Section 73.1125, based on current FCC guidelines regarding the use of alternate terrain showings.¹

The proposed studio location is 1819 Peachtree Rd NE, Atlanta, GA 30309², which lies along the 43° True radial from the transmitter. Figure 1 below is a table for this radial, and the immediate 5 adjacent radials. The FCC 70 dBu contour distance is given, along with the Longley Rice derived 70 dBu mean occurrence distance, and a value representing the percentage of difference between the FCC and the Longley Rice distances. From this table it can be determined that the supplemental methodology is warranted based upon percentage by which the Longley Rice value extends beyond the standard FCC value, thus the terrain departs widely from the assumed terrain for the FCC propagation curves.

Attached as Figure 2 is a map showing the Longley Rice determined 70 dBu mean occurrence contour, the proposed main studio location, as well as the principal community. The assumptions used in Longley Rice calculations are also shown on this map. The microcomputer program Probe 4 was used to in all calculations.

Troy G. Langham
FCC Engineering Supervisor
12 May 2016

¹ FCC DA 10-1760

² 33-48-16.30 N, 084-23-34.38 W (NAD 27)

Figure 1. Distance to Contour Tabulation

Azimuth (deg)	HAAT (m)	FCC 70 dBu	Longley Rice	Change %
			70 dBu	
38	365.3	49.59	63.6	28%
39	364.3	49.56	61.85	25%
40	363.2	49.54	65.6	32%
41	362.1	49.46	62.4	26%
42	360.9	49.39	63.65	29%
43	359.6	49.31	65.25	32%
44	358.1	49.23	64.85	32%
45	356.7	49.15	67.5	37%
46	355.7	49.07	59.3	21%
47	354.7	48.98	61.9	26%
48	353.4	48.89	63.65	30%
Average of Distance Difference				29%

Figure 2. Contour Map

