

TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
STATION WDHT
URBANA, OHIO
CH 275B 50 KW 150 M

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a minor change application for construction permit to modify the facilities of FM station WDHT (FCC Facility ID 60252). Station WDHT currently operates on channel 275B at Springfield, Ohio with a nondirectional antenna maximum effective radiated power (ERP) of 50 kW and an antenna height above average terrain (HAAT) of 150 meters (FCC File No. BLH-19870511KC).

The purpose of this instant application is to specify a change in the city of license of WDHT as permitted by the new rules adopted by the FCC allowing community of license changes by application.¹ Specifically, it is proposed to operate on channel 275B at Urbana, Ohio with a nondirectional antenna maximum ERP of 50 kW and an HAAT of 150 meters. This instant application is being filed under the contingent application rule [Section 73.3517(e)], as grant of this application is contingent on the grant of an application for construction permit for WKSW on channel 268A at Urbana, Ohio to change its city of license to Enon, Ohio (new service) which is being filed concurrently with this application. The instant application is considered a "minor" change in facilities in accordance with Section 73.3573(a)(1)(i) and 73.3573(g). No other changes are proposed.

Response to Paragraph 14 - Community Coverage

Figure 1 is a map showing the predicted coverage contours for the existing WDHT facilities. As indicated, the FCC predicted 70 dBu coverage contour will encompass 100% of the area within the Urbana city limits which is in compliance with Section 73.315.² The Urbana city limits shown on Figure 2 were

¹ Report and Order in the Matter of Revision of Procedures Governing Amendments to the FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services, MB Docket No. 05-210, RM-10960, FCC 06-163, released November 29, 2006 ("Report and Order").

² The FCC has previously indicated that it is appropriate to use actual facilities and terrain in determining that the existing 70 dBu contour

obtained from a map contained in the 2000 U.S. Census of Population.

Response to Paragraph 16 - Interference

Figure 2, attached, is an FM separation study from WDHT's licensed transmitter location for the channel 275B operation based on the Commission's CDBS database. As shown, the proposed antenna location complies with the minimum distance separation requirements of Section 73.207 for Class B operation on channel 275 towards all existing, authorized and proposed stations and allotments with the following exception of the licensed operation for WKLN on channel 272A at Wilmington, Ohio, the licensed operation for WEBN on channel 274B at Cincinnati, Ohio, the licensed operation for WWGL on channel 275A at Huntington Indiana, and both the application and licensed operations for WVKO-FM on channel 276A at Johnstown, Ohio.

With respect to these short-spacings, WKLN is a grandfathered short-spacings under 73.213(c)(2), WEBN is a grandfathered short-spacings under 73.213(a), WWGL utilized the contour protection provisions of Section 73.215 with respect to the licensed operation of WDHT, and WVKO-FM is a grandfathered short-spacing under 73.213(c)(2). The proposed WDHT operation appears to comply with past FCC precedents for reallocation proposals involving such short-spacing as (1) no new short-spacings are created and (2) no existing short-spacings are exacerbated.³

Response to Paragraph 17 - Environmental Protection Act

The proposed WDHT facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with the OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields.

encompasses the entire community of license. See *Woodstock and Broadway, Virginia*, Memorandum Opinion and Order, 3 FCC Rcd 6398 (1988), and *Freemont and Sunnyvale, California* (Notice of Proposed Rulemaking, 16 FCC Rcd 20,530 (MMB 2001)).

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation of the Bulletin. Using a conservative relative field value of 0.5, the total effective radiated power of 100 kW (H+V), and an antenna center of radiation height above ground level of 137 meters, the calculated power density at 2 meters above ground level at the base of the tower is 0.0458 milliwatt per square centimeter (mW/cm^2), or 23% percent of the Commission's recommended limit for an "uncontrolled" exposure areas ($0.2 \text{ mW}/\text{cm}^2$ for FM frequencies). Therefore the proposal complies with RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, procedures will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

Response to Paragraph 18 - Community of License Change - Section 307(b)

1. Proposal

It is proposed to specify a change in the city of license of WDHT on channel 275B from Springfield, Ohio to Urbana, Ohio as permitted by the new rules adopted by the FCC allowing community of license changes by application.

2. Contingent Application

³ See Report and Order in MM Docket No. 99-240 (Albermarle and Indian Trail, North Carolina, DA 01-1660).

This instant application (Urbana replacement service) is being filed under the contingent application rule [Section 73.3517(e)], as a grant is contingent upon grant of an application for construction permit for WKSX on channel 268A at Urbana, Ohio to change its city of license to Enon, Ohio (new service) which is being filed concurrently with this application.

3. City Populations and Local Service

Springfield has a 2000 U.S. Census population of 65,358 persons. Springfield will not be deprived of its sole existing service as FM stations WEEC (Ch. 264B) and WUSO (Ch. 206A) and AM stations WIZE (1340 kHz) and WULM (1600 kHz) are assigned to Springfield.

Urbana has a U.S. Census population of 11,561 persons. Reallotment of WKSX from Urbana to Enon will not deprive Urbana of its sole local aural transmission service as WDHT will provide local aural transmission service to the community of Urbana.

4. Urbanized Area Considerations

Figure 3 is a map which depicts the Urbana city limits and the Springfield Urbanized area. As indicated, Urbana is not located within the Springfield Urbanized area. Also shown is the 70 dBu contour WDHT which encompasses 100% of the Springfield Urbanized Area.

4. Gain and Loss Areas and Available Aural Services

As there will be no change in transmitter site or technical facilities, no gain or loss areas will be created.

5. 70 dBu and 60 dBu Coverage

The following tabulates the area and population within the 70 dBu and 60 dBu contours depicted on Figure 1.

Contour	Population (2000 Census)	Area (sq. km)
70 dBu	581,734	3,352
60 dBu	1,115,997	8,530

Contour locations calculated in accordance with the provisions of Section 73.313. Population calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". Area calculated using a root mean square algorithm.

6. Protected FM and AM Services Available to Enon

It has been determined that there are 13 protected FM and AM services available to Urbana as shown on Figure 4.⁴

If there are any questions, or additional information is required, please contact the office of the undersigned.



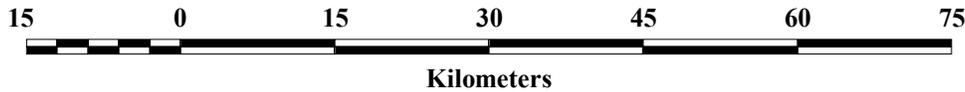
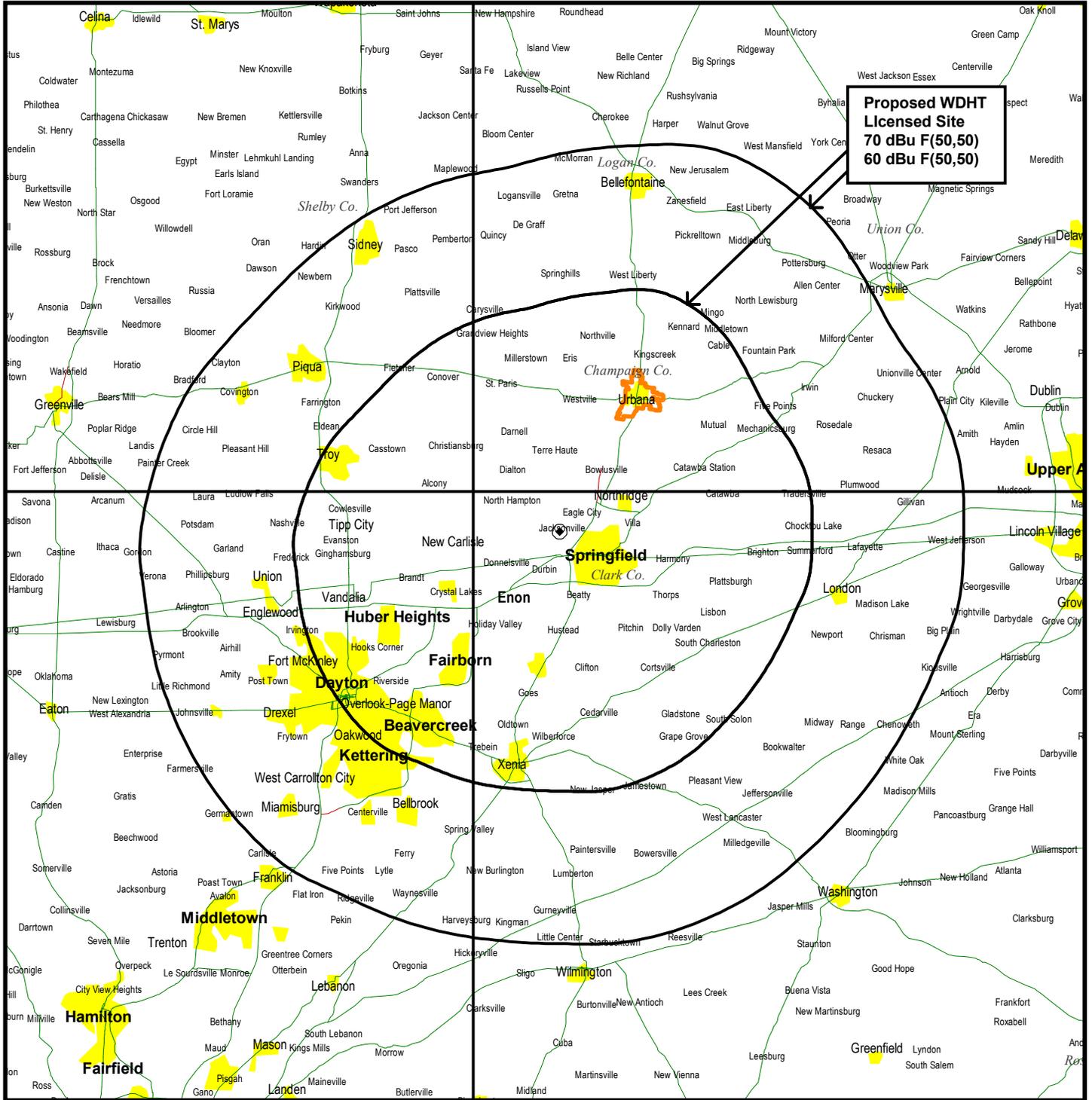
W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL 34237-6019
(941) 329-6000
JEFF@DLR.COM

January 18, 2007

⁴ For FM stations, the pertinent primary service contour has been used. For AM stations, the daytime 2 mV/m contour has been used.

Figure 1



COMPLIANCE WITH SECTION 73.315

FM STATION WDHT
URBANA, OHIO

CH 275B 50 KW-DA 150 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CDBS FM SEPARATION STUDY

Job Title: WDHT CH 275B - Licensed Site
Channel: 275 B

Separation Buffer: 32 km
Coordinates: 39-57-11 083-52-07

Call Id	City St	File Status	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
WROU-FMWEST 26451	CARROL OH	BLH LIC C	19911204KB	221 A 0.890 92.1 182	N	39-43-15 084-15-39	N	232.5	42.33 27.33	0.0	15.0 Clear
WKLN 58372	WILMINGTON OH	BMLH LIC C	19880617KA	272 A 3.000 102.3 91	N	39-21-54 083-46-08	N	172.5	65.85 -3.15	63.0	69.0 Short¹
WHIZ-FMBALTIMORE 61230	BPH OH	CP C	20060327AHM	273 B1 11.000 102.5 152.1	N	39-47-00 082-45-21	N	100.9	97.06 26.06	65.0	71.0 Clear
WEBN 29734	CINCINNATI OH	BLH LIC C	19981112KL	274 B 16.000 102.7 264	N	39-06-59 084-30-07	Y	210.5	107.67 -61.33	145.0	169.0 Short²
WCPZ 19706	SANDUSKY OH	BLH LIC C	19901226KA	274 B 50.000 102.7 41	Y 14182	41-26-28 082-41-14	N	30.7	193.07 24.07	145.0	169.0 Clear
WDHT 60252	SPRINGFIELD OH	BLH LIC C	19870511KC	275 B 50.000 102.9 150	N	39-57-11 083-52-07	N	90.0	0.00 -241.00	211.0	241.0 Short
WWGL 28206	HUNTINGTON IN	BLH LIC C	20050222ADR	275 A 4.700 102.9 91	N	40-55-33 085-23-15	Y	310.6	168.15 -9.85	143.0	178.0 Short³
0	HOPE IN	RM ADD C	*bh001	275 A 0.000 102.9		39-19-29 085-53-41		248.7	187.40 9.40	143.0	178.0 Close
WYGB 18668	EDINBURGH IN	BLH LIC C	20000929AEX	275 A 3.000 102.9 97	Y 31501	39-11-10 085-57-29	N	245.2	198.71 20.71	143.0	178.0 Clear
0	EDINBURGH IN	RM DEL C	*bh001	275 A 0.000 102.9		39-11-10 085-57-29		245.2	198.71 20.71	143.0	178.0 Clear
WYGB 18668	EDINBURGH IN	BPH CP C	20050718AAE	275 A 6.000 102.9 94	N	39-15-37 086-06-21	N	248.8	206.97 28.97	143.0	178.0 Clear
	EDINBURGH IN	RM DEL C	*bh001	275 A 0.000 102.9		39-15-37 086-06-21		248.8	206.97 28.97	143.0	178.0 Clear
	WEST LIBERT KY	RM ADD C	10798	275 C3 0.000 102.9		38-02-16 083-20-18		167.7	217.53 6.53	178.0	211.0 Close

¹ Grandfathered short-spacing under 73.213(c)(2). Proposal appears to comply with past FCC precedents in reallocation proposals involving such short-spacing as (1) no new short-spacings are created and (2) no existing short-spacings are exacerbated. See Report and Order in MM Docket No. 99-240 (Albermarle and Indian Trail, North Carolina, DA 01-1660).

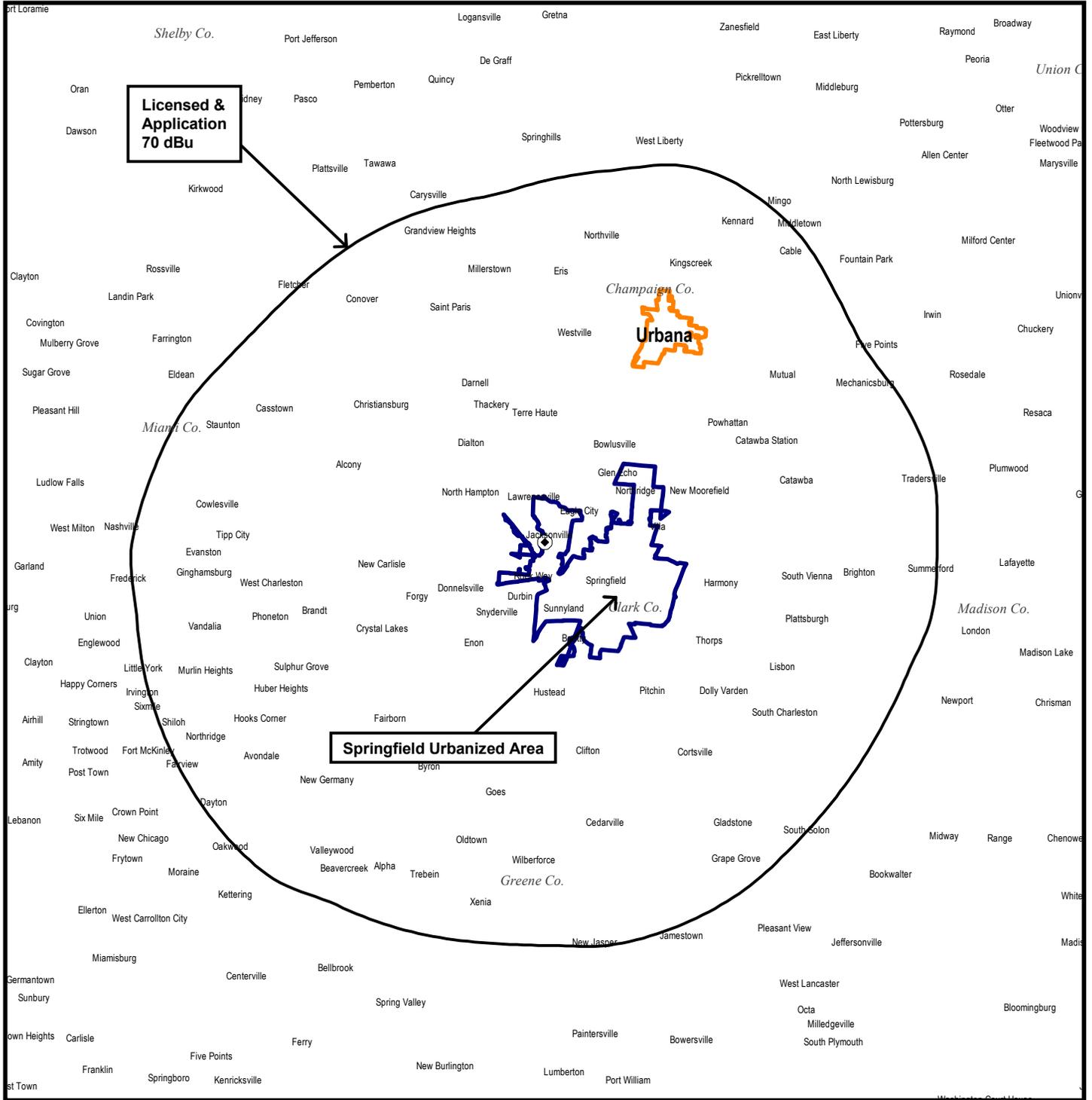
² Grandfathered short-spacing under 73.213(a). Proposal appears to comply with past FCC precedents in reallocation proposals involving such short-spacing as (1) no new short-spacings are created and (2) no existing short-spacings are exacerbated. See Report and Order in MM Docket No. 99-240 (Albermarle and Indian Trail, North Carolina, DA 01-1660).

³ WWGL utilized the contour protection provisions of Section 73.215 with respect to the short-spacing with WDHT licensed operation, which will not change due to no change in facilities. Proposal appears to comply with past FCC precedents in reallocation proposals involving such short-spacing as (1) no new short-spacings are created and (2) no existing short-spacings are exacerbated. See Report and Order in MM Docket No. 99-240 (Albermarle and Indian Trail, North Carolina, DA 01-1660).

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km) 215	207
WWW-FMANN 41080	ARBOR MI LIC C	BLH 19871110KA	275 B 102.9	49.000 152	Y 13809	42-15-04 083-48-28	N	1.1	255.26 14.26	211.0 Close	241.0
WVKO-FMJOHNSTOWN 58633	BPH OH APP C	20060725AAH	276 A 103.1	1.600 135	N	40-13-44 082-39-36	N	73.0	107.53 -5.47	96.0 Short ⁴	113.0
WVKO-FMJOHNSTOWN 58633	BLH OH LIC C	19900227KF	276 A 103.1	1.600 135	N	40-13-44 082-39-32	N	73.0	107.62 -5.38	96.0 Short ⁴	113.0
0	GEORGETOWN OH RSV C	RM 11096	276 A 103.1	0.000		38-52-14 083-45-55		175.8	120.51 7.51	96.0 Close	113.0
WRAC 50136	GEORGETOWN OH APP C	BPH 20060412ACS	276 A 103.1	6.000 100	N	38-52-14 083-45-55	N	175.8	120.51 7.51	96.0 Close	113.0
WRAC 50136	WEST UNION OH LIC C	BLH 19920915KA	276 A 103.1	3.300 130	N	38-51-28 083-36-42	N	169.6	123.60 10.60	96.0 Close	113.0
WMLX 37499	ST. MARYS OH LIC C	BLH 20020731ABJ	277 A 103.3	1.950 170	N	40-38-03 084-12-29	N	339.3	80.95 11.95	63.0 Close	69.0
WJZA 60590	PICKERINGTO OH LIC C	BLH 20061122ADG	278 A 103.5	4.200 119	Y 71809	39-57-00 082-43-29	Y	89.8	97.75 28.75	63.0 Clear	69.0
WGRR 72126	HAMILTON OH LIC C	BLH 19940718KB	278 B 103.5	11.000 316	Y 14607	39-12-01 084-31-22	Y	214.0	100.72 26.72	68.0 Clear	74.0
0	PICKERINGTO OH USE C	RM 10820	278 A 103.5	0.000		39-56-39 082-41-14		90.2	100.97 31.97	63.0 Clear	69.0

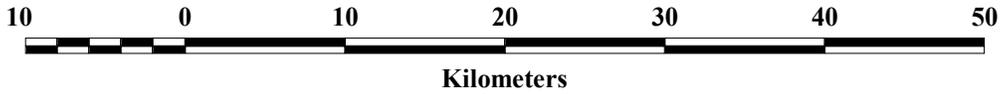
⁴ Grandfathered short-spacing under 73.213(c)(2). Proposal appears to comply with past FCC precedents in reallocation proposals involving such short-spacing as (1) no new short-spacings are created and (2) no existing short-spacings are exacerbated. See Report and Order in MM Docket No. 99-240 (Albermarle and Indian Trail, North Carolina, DA 01-1660).

Figure 3



Licensed & Application 70 dBu

Springfield Urbanized Area



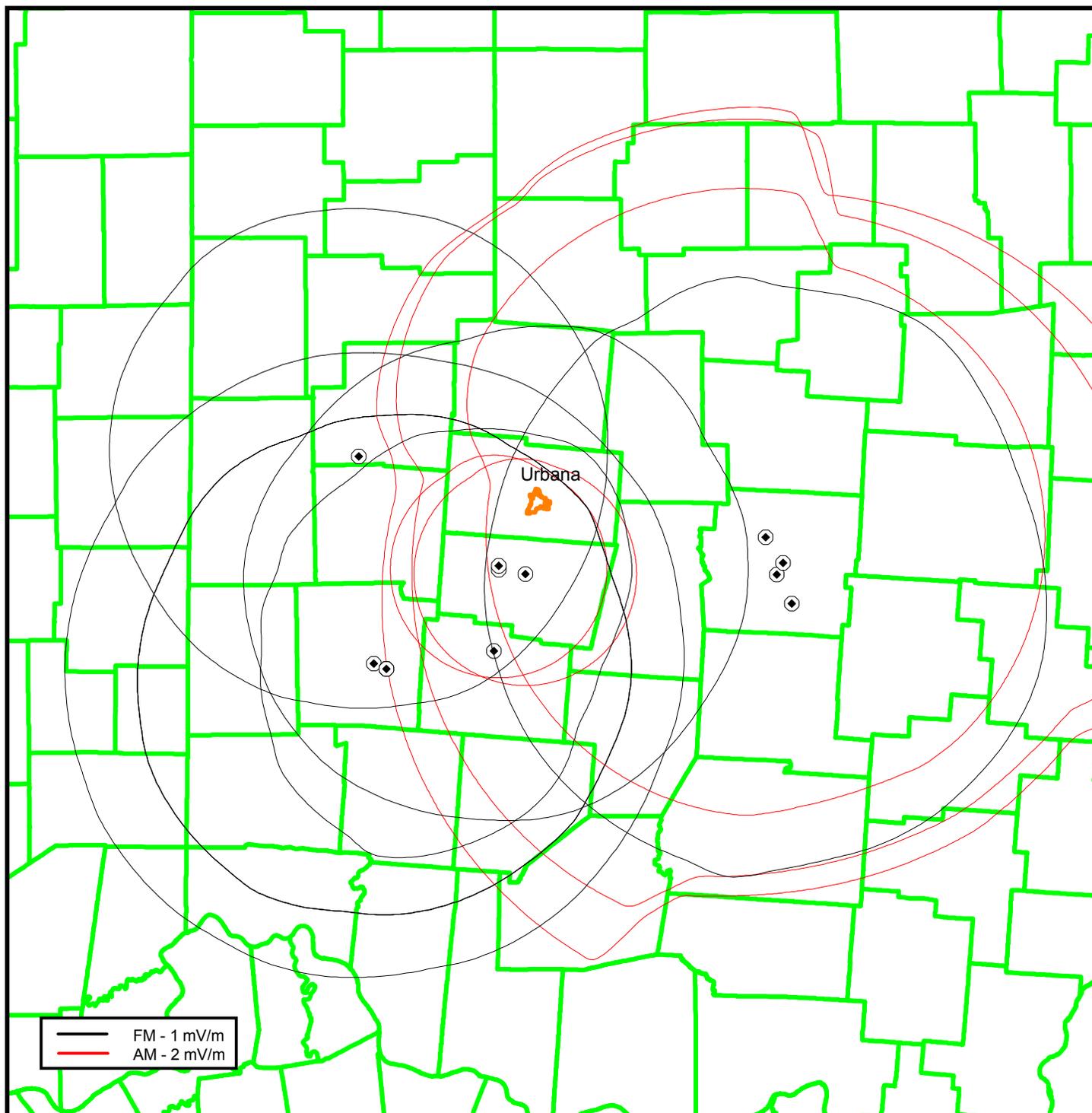
URBANIZED AREA COVERAGE

FM STATION WDHT

URBANA, OHIO

CH 275B 50 KW 150 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



30 0 30 60 90 120 150
Kilometers

**OTHER FM AND AM PROTECTED SERVICES
AVAILABLE TO URBANA, OHIO**

FM STATION WDHT
URBANA, OHIO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Tabulation of Other Stations Available to Urbana, Ohio

Call Sign	City Of License	State	Channel
AM Stations			
WTVN	COLUMBUS	OH	610 kHz
WOSU	COLUMBUS	OH	820 kHz
WRFD	COLUMBUS-WORTHINGTON	OH	880 kHz
WIZE	SPRINGFIELD	OH	1340 kHz
WULM	SPRINGFIELD	OH	1600 kHz
FM Stations			
WYSO	YELLOW SPRINGS	OH	91.3 MHz
WHIO-F	PIQUA	OH	95.7 MHz
WNCI	COLUMBUS	OH	97.9 MHz
WHKO	DAYTON	OH	99.1 MHz
WLQT	KETTERING	OH	99.9 MHz
WEEC	SPRINGFIELD	OH	100.7 MHz
WTUE	DAYTON	OH	104.7 MHz
WMMX	DAYTON	OH	107.7 MHz