

AMEND BPH-20070705ADV
MINOR CHANGE APPLICATION/
CHANGE COMMUNITY OF LICENSE
MILLER COMMUNICATIONS, INC.
WWBD (FM) RADIO STATION
CH 240C2 -95.9 MHZ - 50.0 KW
ISLE OF PALMS, SOUTH CAROLINA
January 2008

EXHIBIT D

City of License Change Review

This application seeks to change the community of license of WWBD, Channel 239C3, Bamberg, South Carolina to Isle of Palms, South Carolina and upgrade to Channel 240C2, using the recently adopted city of license change procedures, as outlined in MB Docket 05-210, released November 29, 2006. This is a review of the proposed change, which demonstrates compliance with the Commission's rules and procedures for a change.

As indicated in Exhibit A, Channel 240C2, at the proposed allocation site at Isle of Palms, South Carolina, meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207 (based on the downgrade of station WAVF to Channel 241C2 and its community of license change to Forestbrook, South Carolina, as requested in a contingent application). The proposed allotment at Isle of Palms, South Carolina is mutually exclusive with the licensed WWBD facility at Bamberg, South Carolina. WWBD is not the only station licensed to Bamberg, South Carolina. AM station WVCD, 790 kHz, will remain licensed to Bamberg-Denmark, South Carolina.

Therefore, the relocation to Isle of Palms will not remove the sole service from Bamberg. As a result of the proposed change, the community of Isle of Palms will receive its first locally licensed/operational station.

Therefore, MCI proposes the following:

Isle of Palms, South Carolina

Present	Proposed
None	240C2

Bamberg, South Carolina

Present	Proposed
239C3	None ¹

The proposed allocation site for Channel 240C2 at Isle of Palms, South Carolina is removed from the present and permitted site for WWBD to accommodate the change in community of license and upgrade. Based on the relocation, the present 60 dBu contour of WWBD will not have any overlap with the proposed new Isle of Palms facility, although the licensed WWBD is mutually exclusive with the proposed WWBD at Isle of Palms, as indicated on Exhibit A. The existing Channel 239C3 facility at Bamberg, South Carolina provides a 60 dBu contour to 114,280 persons in 4,802.9 square kilometers.² The allotment site for Channel 240C2 at Isle of Palms, South Carolina will provide a 60 dBu contour to 487,573 persons in

1) WVCD will remain licensed to Bamberg-Denmark, South Carolina.

2) All allocation comparison data is based on uniform terrain and 2000 US Census population.

8,560.3 square kilometers. The resultant move will create a loss of service to 114,280 persons in 4,802.9 square kilometers and a gain of service to 487,573 persons in 8,560.3 square kilometers.

A map depicting the proposed actual service contours of WWBD at Isle of Palms, South Carolina, based on the implementation site, is attached as Exhibit D1. The proposed WWBD (implementation) facility will provide a 60 dBu service to 509,324 persons in 6,484.5 square kilometers and a 70 dBu service to 436,349 persons in 2,402.2 square kilometers (assuming actual terrain conditions).

As a result of the relocation, gain and loss areas are created. Exhibit D2 is a depiction of the licensed services in the WWBD gain area. It is noted that the entire gain area is served by a minimum of five full time services. A tabulation of the stations providing service to the gain area is attached as Exhibit D3. Exhibit D4 is a map which depicts the existing licensed services in the WWBD daytime loss area. There are a minimum of five daytime only services in the loss area. A tabulation of the stations providing daytime service to the loss area is attached as Exhibit D5. Exhibit D6 is a depiction of the remaining services at night in the WWBD loss area. It is noted there are some under-served areas, where WWBD presently provides a third, fourth or fifth service. The stations providing service to the WWBD nighttime loss area are tabulated on Exhibit D7. WWBD's licensed facility provides a third nighttime service to 224 persons in 16.8 square kilometers and a fourth nighttime service is provided to 901 persons in 149.7 square kilometers. It also provides a fifth nighttime service to 4,606 persons in 451.7 square kilometers.

Based on the foregoing, the gain area (full time) and loss area (daytime) are adequately served.³ The level of nighttime under-served area does not involve any white or gray areas, therefore, the nighttime under-served area is not considered further.

Attached as Exhibit D8 is a map showing the licensed stations which provide protected service to the community of Isle of Palms, South Carolina.⁴ A tabulation of the stations providing protected service to Isle of Palms is attached as Exhibit D9.

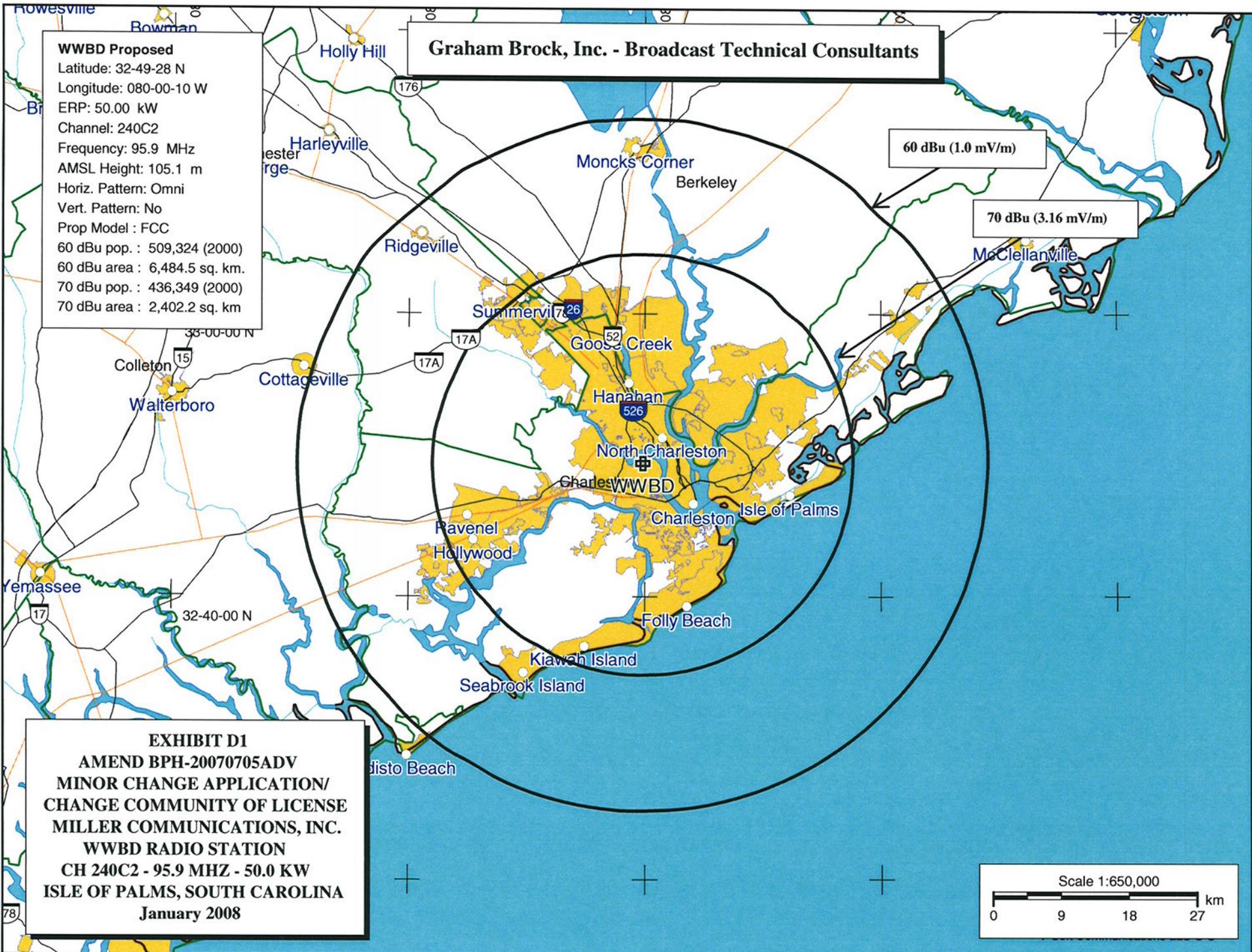
It is noted that the community of Isle of Palms, South Carolina is located within the Charleston-North Charleston, South Carolina Urbanized Area. Further, both the proposed WWBD facility, and that of a maximum Class C2 facility from the allocation reference site, will provide a 70 dBu signal over more than 50% of the Urbanized Area, as shown on Exhibit D10. Therefore, a Tuck analysis is necessary and is attached elsewhere in this submission. Based on the foregoing, the proposed change of community of license complies with the Commission's technical rules and regulations.

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- 3) To determine services, commercial and non-commercial FM stations in the area were reviewed. There were no full-time AM stations serving the gain or loss areas. For FM commercial stations, maximum facilities were used for each Class, except Class A facilities. Some Class A stations were considered 3.0 kilowatt Class A stations, while others were depicted as 6.0 kilowatt Class A stations, based on their operating facilities, or spacing review. Class C FM stations were considered, based on the reference contour determined by the station's licensed power and height. Any non-commercial FM station's 60 dBu reference contour was determined from its licensed facility, based on the reference distance, which was determined by power and HAAT of the facility. The FM contours assumed uniform terrain.
 - 4) As the population of Isle of Palms is more than 2,500 persons, the 2.0 mV/m contours for AM stations was depicted.

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WWBD Proposed

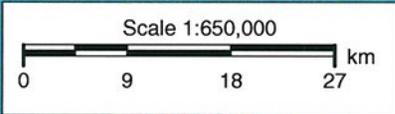
Latitude: 32-49-28 N
Longitude: 080-00-10 W
ERP: 50.00 kW
Channel: 240C2
Frequency: 95.9 MHz
AMSL Height: 105.1 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model : FCC
60 dBu pop. : 509,324 (2000)
60 dBu area : 6,484.5 sq. km.
70 dBu pop. : 436,349 (2000)
70 dBu area : 2,402.2 sq. km



60 dBu (1.0 mV/m)

70 dBu (3.16 mV/m)

EXHIBIT D1
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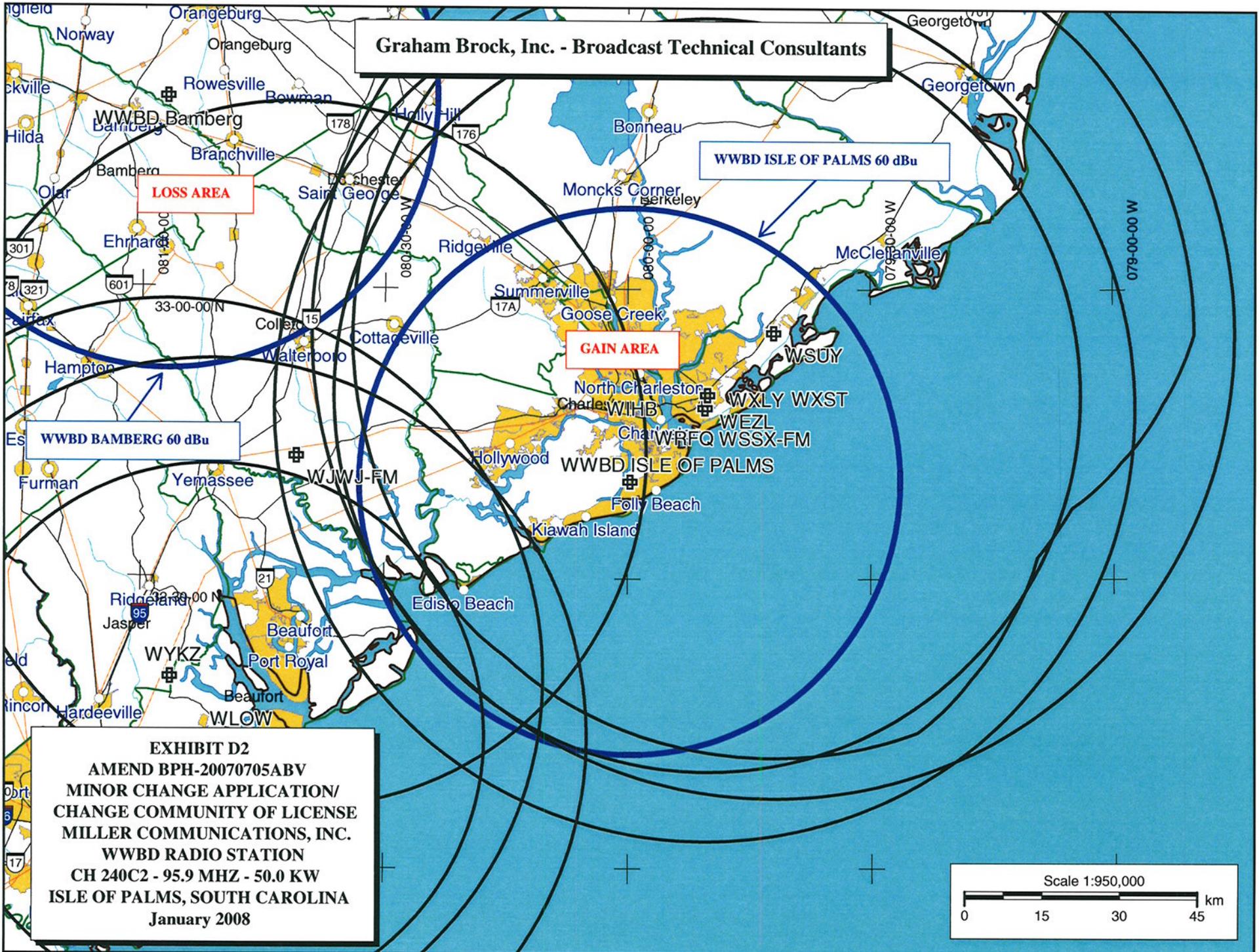
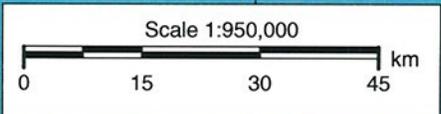


EXHIBIT D2

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EXHIBIT D3

WWBD Gain Area Service

Call	Channel	City, State
WSCI	207C	Charleston, South Carolina
WJWJ-FM	210C1	Beaufort, South Carolina
WIHB	223C1	Moncks Corner, South Carolina
WSSX-FM	236C0	Charleston, South Carolina
WSUY	245C	Charleston, South Carolina
WYKZ	254C1	Beaufort, South Carolina
WXST	259C1	Hollywood, South Carolina
WXLY	273C1	North Charleston, South Carolina
WEZL	278C1	Charleston, South Carolina
WRFQ	283C1	Mount Pleasant, South Carolina
WGZR	295C1	Bluffton, South Carolina
WLOW	300C2	Port Royal, South Carolina

Note: There are additional stations providing service to the gain area that are not shown as the gain area already had five full time services depicted.

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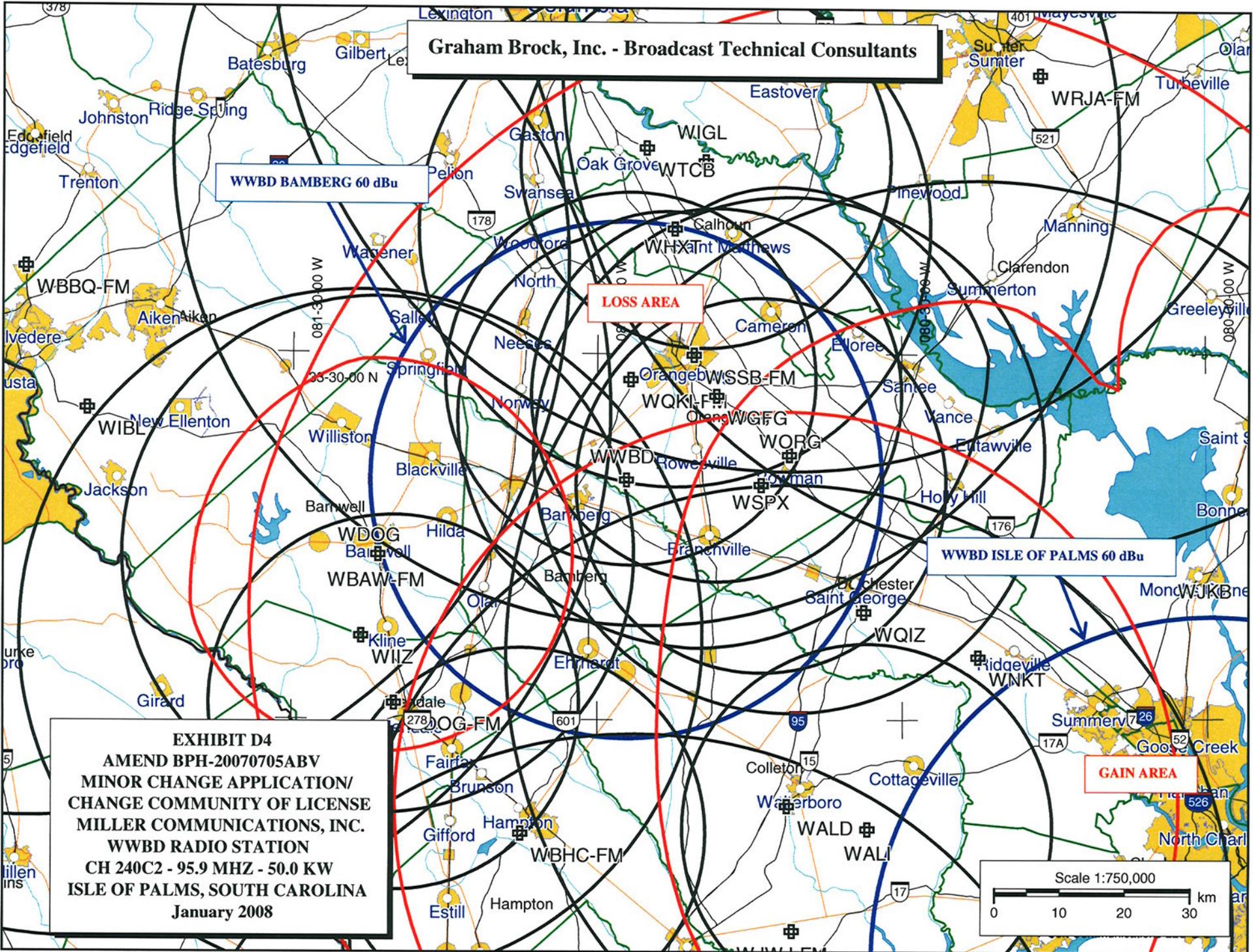
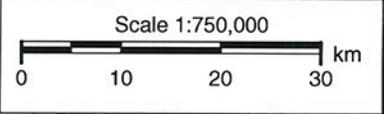


EXHIBIT D4
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EXHIBIT D5

WWBD Daytime Loss Area Service

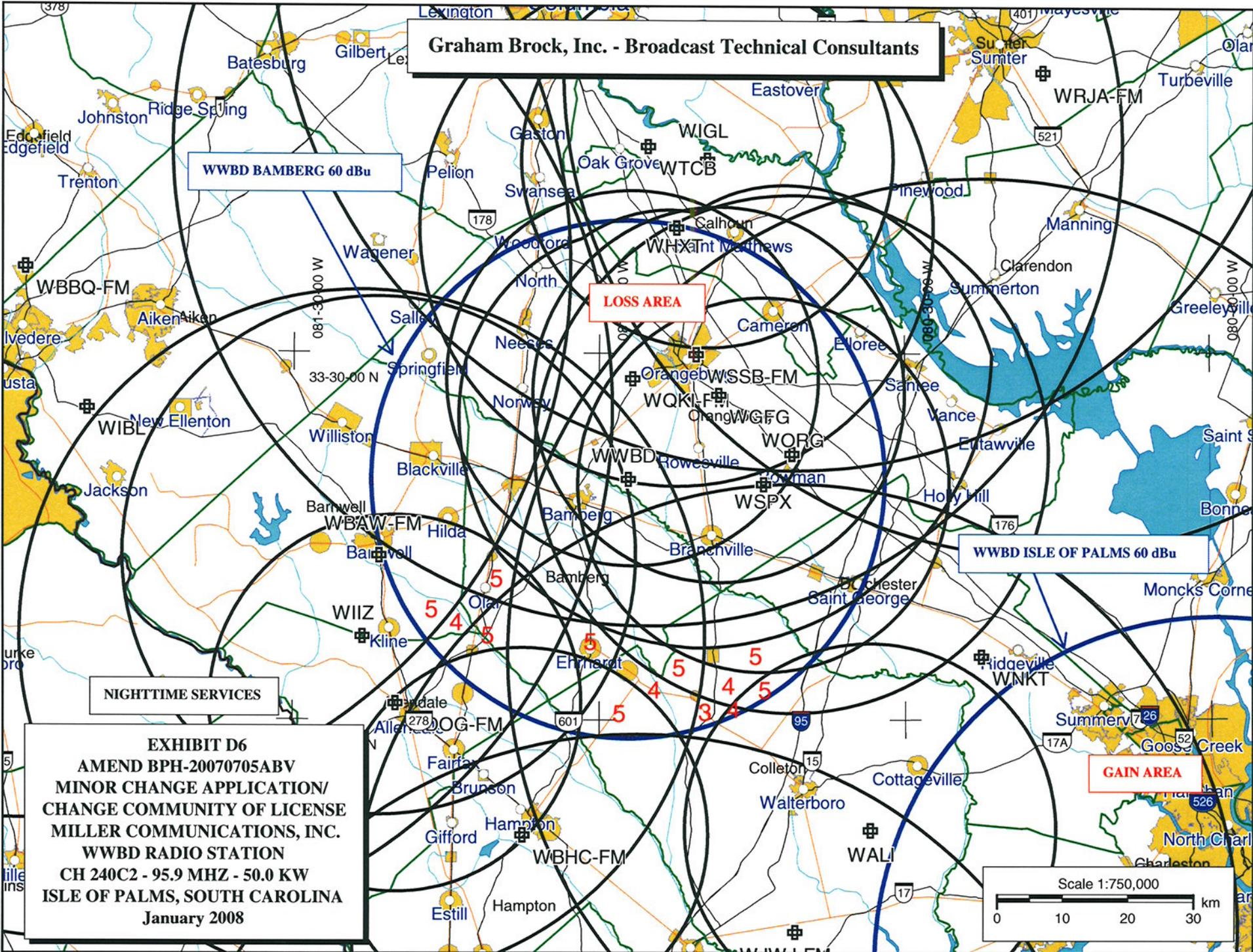
AM Stations

Call	Frequency	City, State
WQIZ	810 kHz	St. George, South Carolina
WJKB	950 kHz	Moncks Corner, South Carolina
WALD	1080kHz	Walterboro, South Carolina
WDOG	1460 kHz	Barnwell, South Carolina

FM Stations

Call	Channel	City, State
WRJA-FM	201C	Sumter, South Carolina
WJWJ-FM	210C1	Beaufort, South Carolina
WSSB-FM	212C1	Orangeburg, South Carolina
WBHC-FM	221A	Hampton, South Carolina
WDOG-FM	228A	Allendale, South Carolina
WALI	229A	Walterboro, South Carolina
WIGL	230A	St. Matthews, South Carolina
WSPX	233A	Bowman, South Carolina
WIIZ	250C2	Blackville, South Carolina
WYKZ	254C1	Beaufort, South Carolina
WBAW	256C3	Barnwell, South Carolina
WORG	262C3	Elloree, South Carolina
WWDM	267C	Sumter, South Carolina
WQKI-FM	275A	Orangeburg, South Carolina
WHXT	280C3	Orangeburg, South Carolina
WBBQ-FM	282C0	Augusta, Georgia
WGFG	286A	Branchville, South Carolina
WIBL	289C	Augusta, Georgia
WTCB	294C1	Orangeburg, South Carolina
WNKT	298C	St. George, South Carolina

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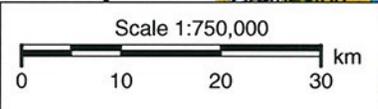
WWBD BAMBERG 60 dBu

LOSS AREA

WWBD ISLE OF PALMS 60 dBu

NIGHTTIME SERVICES

EXHIBIT D6
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EXHIBIT D7

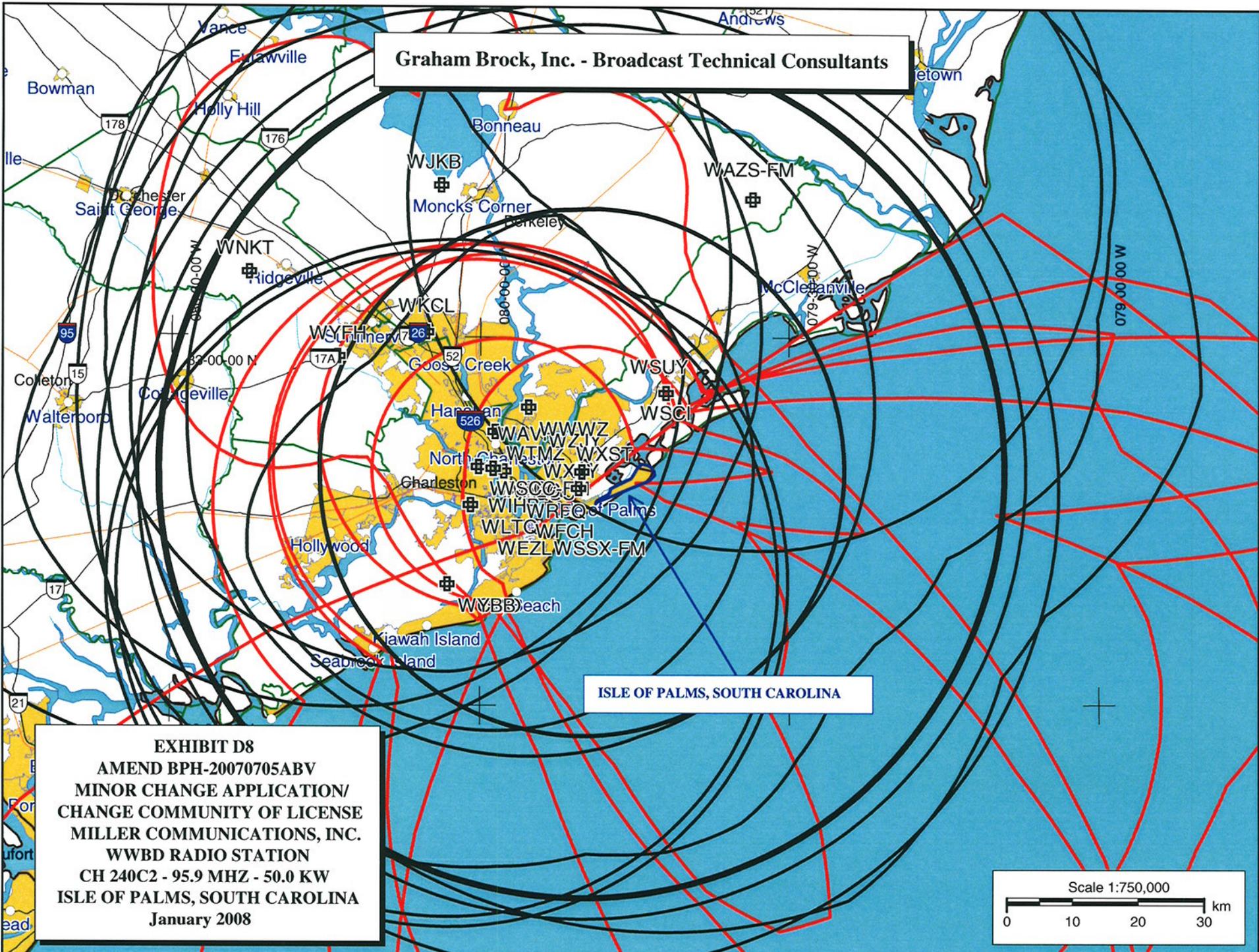
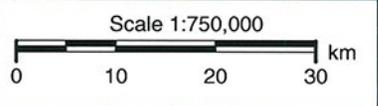
WWBD Nighttime Loss Area Service

Call	Channel	City, State
WRJA-FM	201C	Sumter, South Carolina
WJWJ-FM	210C1	Beaufort, South Carolina
WSSB-FM	212C1	Orangeburg, South Carolina
WBHC-FM	221A	Hampton, South Carolina
WDOG-FM	228A	Allendale, South Carolina
WALI	229A	Walterboro, South Carolina
WIGL	230A	St. Matthews, South Carolina
WSPX	233A	Bowman, South Carolina
WIIZ	250C2	Blackville, South Carolina
WYKZ	254C1	Beaufort, South Carolina
WBAW	256C3	Barnwell, South Carolina
WORG	262C3	Elloree, South Carolina
WWDM	267C	Sumter, South Carolina
WQKI-FM	275A	Orangeburg, South Carolina
WHXT	280C3	Orangeburg, South Carolina
WBBQ-FM	282C0	Augusta, Georgia
WGFG	286A	Branchville, South Carolina
WIBL	289C	Augusta, Georgia
WTCB	294C1	Orangeburg, South Carolina
WNKT	298C	St. George, South Carolina

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ISLE OF PALMS, SOUTH CAROLINA

EXHIBIT D8
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EXHIBIT D9

Stations Providing Protected Service to Isle of Palms, South Carolina

AM Stations

Call	Frequency	City, State
WOKV	690 kHz	Jacksonville, Florida
WLTQ	730 kHz	Charleston, South Carolina
WTMZ	910 kHz	Dorchester Terr.-Br, South Carolina
WJKB	950 kHz	Moncks Corner, South Carolina
WTMA	1250 kHz	Charleston, South Carolina
WQSC	1340 kHz	Charleston, South Carolina
WXTC	1390 kHz	Charleston, South Carolina
WJZY	1480 kHz	Mount Pleasant, South Carolina

FM Stations

Call	Channel	City, State
WFCH	203C2	Charleston, South Carolina
WSCI	207C	Charleston, South Carolina
WYFH	214C2	North Charleston, South Carolina
WKCL	218C1	Ladson, South Carolina
WIHB	223C1	Moncks Corner, South Carolina
WWWZ	227C2	Summerville, South Carolina
WSCC-FM	232C3	Goose Creek, South Carolina
WSSX-FM	236C0	Charleston, South Carolina
WAVF	241C1	Hanahan, South Carolina
WSUY	245C	Charleston, South Carolina
WYBB	251C2	Folly Beach, South Carolina
WAZS-FM	255C2	McClellansville, South Carolina
WXST	259C1	Hollywood, South Carolina
WALC	263C3	Charleston, South Carolina
WXLY	273C1	North Charleston, South Carolina
WEZL	278C1	Charleston, South Carolina
WRFQ	283C1	Mount Pleasant, South Carolina
WCOO	288C2	Kiawah Island, South Carolina
WNKT	298C	St. George, South Carolina

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WWBD Reference
Latitude: 32-40-09 N
Longitude: 079-59-43 W
ERP: 50.00 kW
Channel: 240C2
Frequency: 95.9 MHz
AMSL Height: 150.16 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model : None

WWBD
Latitude: 32-49-28 N
Longitude: 080-00-10 W
ERP: 50.00 kW
Channel: 240C2
Frequency: 95.9 MHz
AMSL Height: 105.1 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model : FCC

CHARLESTON-NORTH CHARLESTON URBANIZED AREA

WWBD 70 dBu

WWBD 70 dBu (radius)

EXHIBIT D10
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