

Comprehensive Engineering Exhibit
WBBG(FM) Facility ID 73309
Minor Change Application
May 11, 2007

By this application it is sought to modify the facility of WBBG(FM) to specify a new antenna height, location, and principal community.

The proposed WBBG(FM) antenna is to be non-directional and will be located 85 meters above ground level upon a tower described by antenna structure registration number 1013509. This tower is also the support structure for the antenna of station WZOO-FM and is located 4.09 km from the array of standard band station WFUN(AM).

From this location WBBG(FM) is fully spaced as a class A facility in accordance with Section 73.207, and applicable agreements, to all known facilities, applications and allocations, foreign and domestic with the exceptions of 3rd adjacent WGOJ(FM) Conneaut, Ohio, and co-channel CKLA(FM) Guelph, Ontario Canada.

Attached Figure 1 demonstrates that in accordance with Section 73.215 no prohibited contour overlap is predicted to occur with station WGOJ (FM) and processing under that section is requested. WGOJ (FM) is a station that has elected 73.215 spacing in a previous application and is now so licensed.

The proposed site is short to CKLA (FM) Guelph, Ontario, Canada under the standards set forth in the *1991 Working Agreement Between the Government of Canada and the Government of the United States of America* as amended in 1997. Prohibited contour overlap with station CKLA (FM) will not occur with the proposed facility. Figure 2 is a map showing that the proposed 34 dBu F(50:10) interfering contour of WBBG(FM) from the antenna coordinates, with the proposed facilities (ERP 6 kW/HAAT 97 meters), does not overlap the CKLA(FM) 54 dBu flat earth contour at maximum class B facilities.

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

The proposed antenna system is an EPA type 3, 3- bay, 1.0 wave spaced "Roto Tiller" style antenna, mounted with its center of radiation 85 meters above ground level. This proposal will operate with an effective radiated power of 6 kilowatts in both the horizontal and vertical planes. At 2 meters above ground, at 42 meters from the base of the tower, this proposal will contribute worst case 6.1 microwatts per square centimeter, or 0.61 percent of the allowable ANSI limit for controlled exposure, and 3.05 percent of the allowable limit for uncontrolled exposure. This figure is less than 5% of the applicable FCC exposure limit at all locations extending out from the base of the tower. Section 1.1307(b)(3) excludes applications when the calculated level is predicted to be

less than 5% of the applicable exposure limit. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

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Figure 1- Section 73.215 Contours.



Figure 2 – Contour to Canada

