



Exhibit I
Engineering Statement
in support of
Application for Construction Permit
to
Modify the License of WVGR-FM
Grand Rapids, MI

Background

WVGR-FM is licensed to the Regents of the University of Michigan and has served the Grand Rapids area for over 40 years on Channel 281 (104.1 MHz). WVGR-FM currently operates a temporary site under an STA as it lost its former (and original) site when the owner of the television station on whose tower the WVGR antenna had been mounted could no longer accommodate it because of lack of capacity given the transition to DTV broadcasting.

WVGR is a "grandfathered" station which operates with facilities in excess of the normally allowable Class B maxima (108 kW @ 183 m). The new site for WVGR is approximately 3.8 km SSW of the licensed facility and it proposes to erect a new tower at this site.

Applicable Rules

WVGR-FM, which operates as a non-commercial unreserved channel is governed by Section 73.513 and by Subpart B of Part 73 (Sections 73.201 through 73.213). In particular, Section 73.211(c), "grandfathers" the locus of the 1 mV/m (60 dBu) contour of the licensed WVGR operation.



For the purposes of this application, the ERP specified is that authorized by its license but a directional antenna is proposed to maintain the 60 dBu contour of the proposed facility within the 60 dBu contour of the licensed facility. See Figure 1 attached.

Site

The coordinates of the proposed site are:

42-39-18 N (NAD 27)
85-31-38 W

A notification to the FAA on Form 7460-1 is being made simultaneously with the filing of this application specifying an overall height above ground of 245 meters (804 feet) and a ground elevation of 241 meters (790 feet) above mean sea level [overall height above mean sea level 486 meters (1,594 feet)].

Operating Parameters

ERP	108 kW	(H/V)
RC AMSL	460 m	(H/V)
RC HAAT	219 m	(H/V)

Spacing Studies

The licensed WVGR-FM facilities are short-spaced to WSNX-FM, Muskegon, MI (Channel 283). The proposed relocation will eliminate this short spacing.



Other authorized facilities and applications considered are listed below. No new short spacings are created by the proposed relocation [distances rounded per Section 73.208(c)(8)].

Stations Considered

<u>Call</u>	<u>Channel</u>	<u>Class</u>	<u>City</u>	<u>Required Dist. (km)</u>	<u>Actual Dist. (km)</u>	<u>Margin (km)</u>
WZBL	279	A	Hartford, MI	69	71	+ 2
WRBR	280	A	South Bend, IN	113	118	+ 5
WRSR	280	A	Owosso, MI	113	131	+18
WSAG	281	A	Pinconning, MI	178	175	+ 3
WCZY	282	A	Mt. Pleasant, MI	113	119	+ 6
WSNX	283	B	Muskegon, MI	74	74	0

Environmental & RFR

The proposed construction does not involve any of the criteria listed in Section 1.1307 which would require the preparation of an Environmental Assessment.

The maximum ground level radio frequency radiation (RFR) is calculated to be 0.006 mW/cm² or significantly less than 1% of the MPE for public exposure (0.2 mW / cm²) and further consideration is not required.

However, workers on the tower could be exposed to levels in excess of the occupational MPE (1.0 mW/cm²) if working near the antenna. WVGR will make appropriate reductions in operating power for workers as necessary.

The tower base will be fenced to limit access to authorized personnel. Appropriate signage advising of the RFR hazards will be installed at appropriate locations.

**Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

John F.X. Browne, P.E.
July 14, 2003