

TECHNICAL EXHIBIT  
MINOR CHANGE APPLICATION  
FOR MODIFICATION OF CONSTRUCTION PERMIT  
STATION WSSL-FM  
FACILITY ID 59819  
GRAY COURT, SOUTH CAROLINA  
CH 263C0 100 KW 381 M

Technical Narrative

This Technical Exhibit was prepared on behalf of FM station WSSL-FM at Gray Court, South Carolina, in support of a minor change application for modification of construction permit (BPH-20011226AAQ). Station WSSL-FM is licensed to operate as a Class C station on channel 263 (100.5 MHz) with a nondirectional antenna maximum effective radiated power (ERP) of 100 kilowatts (kW) and with an antenna height above average terrain (HAAT) of 378 meters (BMLH-19930820KC). In addition, WSSL-FM is also authorized by outstanding construction permit (BPH-20011226AAQ) to operate as a Class C station on channel 263 with a nondirectional antenna maximum ERP of 100 kW with an HAAT of 584 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 a minor modification application for WWWQ on channel 263C2 at College Park, Georgia (facility ID 6809), which is being filed concurrently with this application. Processing in accordance with Section 73.215 is also requested as detailed below.

Proposed Facilities

This instant application proposes to downgrade WSSL-FM from Class C to Class C0 status on channel 263 and operate from its licensed site with its licensed facilities. Specifically, operation is proposed on channel 263C0 with an ERP of 100 kW and an HAAT of 381 meters. It is noted that minor corrections in WSSL-FM's licensed coordinates and HAAT (from 378 meters to 381 meters) are proposed in order to conform with registered tower data.<sup>1</sup> It is also noted that WSSL-FM's outstanding construction permit (BPH-20011226AAQ) reflects the corrected coordinates and site elevation. This instant application is being filed concurrently with a minor

modification application for WWWQ on channel 263C2 at College Park, in order to allow WWWQ to operate from a transmitter site which is "short-spaced" to the existing WSSL-FM site. In addition, this application is also being filed to re-classify WSSL-FM as a Section 73.215 station, with respect to the proposed WWWQ channel 263C2 operation.

Response to Paragraph 14 - Community Coverage

Figure 1 is a map showing the 60 dBu and 70 dBu coverage contours for the proposed operation. The map demonstrates that the WSSL-FM proposal complies with the city coverage provisions of Section 73.315. The Gray Court city limits depicted on Figure 1 were obtained from the 2000 U.S. Census of population.

Response to Paragraph 16 - Interference

The allocation study in Figure 2 indicates that the WSSL-FM site is involved in short-spacings with the proposed WWWQ operation on channel 263C2 at College Park and WROQ on channel 266C0 at Anderson, South Carolina. Each short-spacing is addressed below.

The licensed WSSL-FM channel 263C operation is short-spaced by 88.19 km to WROQ and the proposed WSSL-FM channel 263C0 operation is short-spaced by 79.24 kilometers to WROQ. The short-spacing with WROQ is grandfathered under Section 73.213(a)(4). Pursuant to that Section there are no distance separation or interference requirements with respect to this short-spacing.

The WSSL-FM site is short-spaced by 10.58 kilometers to the WWWQ contingent application site for channel 263C2 at College Park. The WSSL-FM site does meet the minimum, Section 73.215 separation distance of 227 kilometers with respect to the WWWQ channel 263C2 application. The map in Figure 3 indicates that contour protection will be provided to the pending WWWQ channel 263C2 operation. Since the WWWQ application proposes to operate pursuant to Section 73.215 (by way of its contingently filed application), its actual facilities (12.5 kW/298 meters, DA) were used for contour protection by WSSL-FM.

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<sup>1</sup> Pursuant to Section 73.1690(a)(3), the coordinate correction can be made without prior FCC approval.

Environmental Considerations

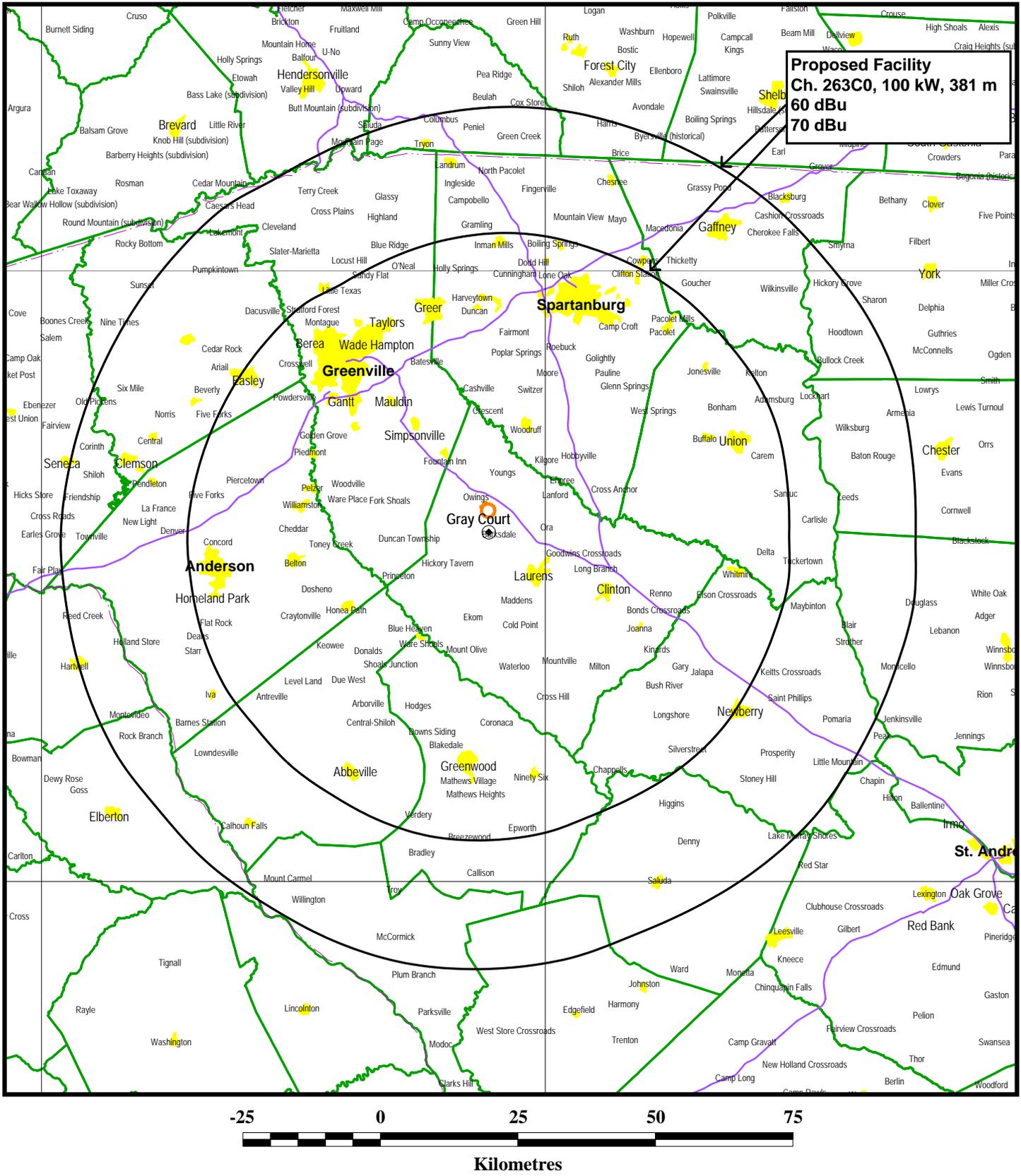
The WSSL-FM application for renewal of license (BRH-20030801ABF) indicated that the WSSL-FM operation was in compliance with the radiofrequency radiation requirements of Section 1.1307(b). Since there is no proposed change in the current operating parameters for WSSL-FM it is believed that the WSSL-FM operation is in compliance with the FCC's RF emission rules.



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Figure 1



**COMPLIANCE WITH SECTION 73.315**

FM STATION WSSL-FM  
GRAY COURT, SOUTH CAROLINA  
CH 263C0 100 KW 381 M

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

CDBS FM SEPARATION STUDY

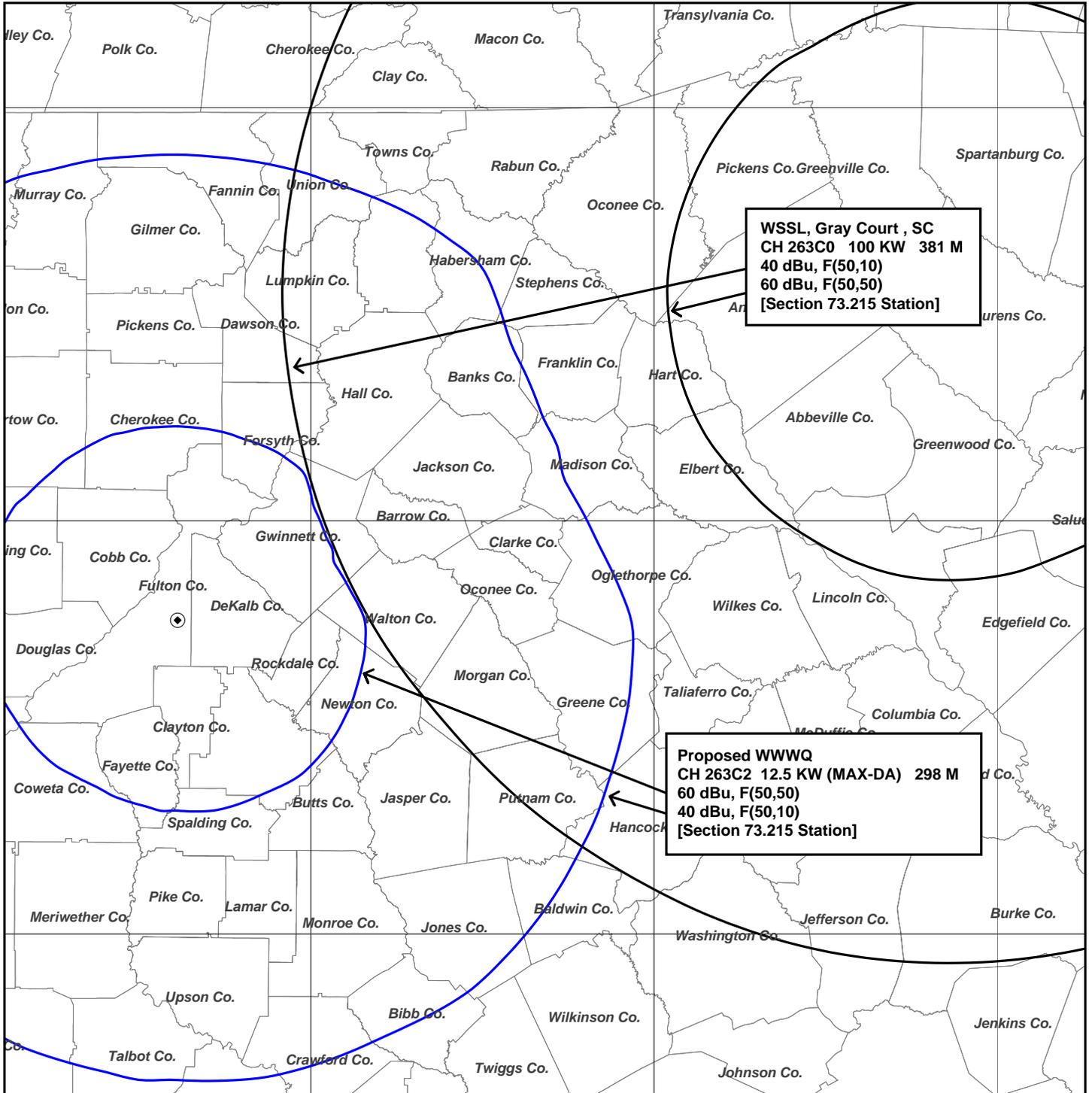
Job Title: Proposed WSSL, Ch. 263C0, Gray Court, SC Separation Buffer: 32 km  
 Channel: 263C0 Coordinates: 34-34-18 082-06-44

Call Id	City St	File Status	Channel Num	ERP Freq	HAAT	DA Id	Latitude Longitude	73 215	Bear 215	Dist. (km)	Req. (km) 215	207
WKSF 2947	OLD FORT NC	BMLH LIC C	20031105AEC	260 C 99.9	53.000 799	N	35-25-32 082-45-25	N	328.4	111.52 6.52	99.0 Close	105.0
WXKT 51120	WASHINGTON GA	BLH LIC C	7093	261 A 100.1	2.400 98	N	33-43-50 082-43-10	N	211.0	108.81 22.81	80.0 Clear	86.0
WSSL-FMGRAY 59819	COURT SC	BPH CP C	20011226AAQ	263 C 100.5	100.000 584	N	34-34-18 082-06-44	N	105.7	0.00		
WSSL-FMGRAY 59819	COURT SC	BMLH LIC C	19930820KC	263 C 100.5	100.000 378	N	34-34-19 082-06-41	N	68.0	0.08		
WXRS-FMSWAINSBORO 36212	BMLH GA	263 A LIC C	19921120KD	3.000 100.5	91	N	32-34-52 082-23-14	N	186.6	222.25 7.25	193.0 Close	215.0
WWWQ 6809	COLLEGE GA	PAR BPH CP C	20000714AAV	263 C3 100.5	3.000 291	Y	33-45-34 084-23-19	Y	247.3	228.42 2.42	215.0 Close	226.0
WWWQ 6809	COLLEGE GA	PAR BPH PROPOSED		263 C2 100.5	12.500 298	Y	33-45-34 084-23-19	Y	247.3	228.42 -10.58	227.0 <b>Short<sup>1</sup></b>	239.0
WHLZ 11653	MARION SC	BLH LIC C	20021101ABR	263 C3 100.5	25.000 100	Y	34-23-26 079-35-25	Y	94.3	232.54 6.54	215.0 Close	226.0
	COLLEGE GA	PAR RM ADD C	9268	263 C3 100.5	0.000	N	33-45-32 084-30-10	N	248.3	238.15 12.15	215.0 Close	226.0
WWWQ 6809	COLLEGE GA	PAR BPH CP C	20030124AGK	263 C2 100.5	27.000 143	N	33-41-20 084-30-38	Y	246.7	241.93 2.93	227.0 Close	239.0
WZJS 60647	BANNER NC	ELK BLH LIC C	19920623KB	264 A 100.7	1.100 231	Y	36-10-34 081-50-05	N	7.9	179.78 27.78	130.0 Clear	152.0
	SOCIAL GA	CIRC RM ADD C	9384	264 C3 100.7	0.000	N	33-29-28 083-45-05	N	232.0	193.08 30.08	152.0 Clear	163.0
	COVINGTON GA	RM ADD C	9027	264 C3 100.7	0.000	N	33-28-34 083-45-34	N	231.7	194.71 31.71	152.0 Clear	163.0
WROQ 318	ANDERSON SC	BLH LIC C	19870204LD	266 C0 101.1	100.000 301	Y	34-38-51 082-16-13	N	300.3	16.76 -79.24	90.0 <b>Short<sup>2</sup></b>	96.0

<sup>1</sup> The instant WSSL-FM modification application and WWWQ are concurrently filing contingent applications to utilize the contour protection provisions of Section 73.215 with respect to this short-spacing. The instant WSSL application also proposes a downgrade in Class on channel 263 from Class C to Class C0 from its current site. See Technical Narrative and Figure 3. The instant WWWQ modification application and the WSSL application are filed in compliance with the "contingent application" rule [Section 73.3517(e)]. In addition, the actual distance between the instant WWWQ modification application and WSSL (228.50 km) exceeds the minimum separation requirement contained in Section 73.215(e) (227 km).

<sup>2</sup> The short-spacing with WROQ is grandfathered under Section 73.213(a)(4). Pursuant to that Section there are no distance separation or interference requirements with respect to this short-spacing. See Technical Narrative.

Figure 3



-30 0 30 60 90 120 Kilometres

## COMPLIANCE WITH SECTION 73.215

STATION WSSL-FM  
GRAY COURT, SOUTH CAROLINA  
CH 263C0 100 KW 381 M

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