

TECHNICAL EXHIBIT

CHANGE OF COMMUNITY OF LICENSE TO GULFPORT, FLORIDA

Technical Narrative

This technical narrative and accompanying Figures have been prepared in support of an application for the minor modification of the WFUS 278C Bradenton, Florida to specify operation on channel 278C0 at Gulfport, Florida.

No new technical facilities are being requested in this application.

As the requested change is mutually exclusive with the Permit's current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a)(i) and 73.3573(g).

The following is a summary of the merits of this modification:

- The community of Gulfport, Florida (2000 Census population 12,527 persons) will be provided with its first local aural transmission service.
- The community of Bradenton, Florida (2000 Census population 49,504 persons) will not lose service, as the Permit has not yet been constructed, and will continue to be well served by other aural reception services.
- The proposed channel 278C0 allotment site at Gulfport, Florida, satisfies the Commission's allocations spacing rules for a fully spaced, full 100 kilowatt (kW) Class C0 facility.¹

¹ The proposed allotment reference coordinates are 27° 50' 32.0" North, 82° 15' 45.0" West. See this Exhibit under the heading "Compliance with FCC Rules" for details on allocations considerations with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

- The 60 dBu area associated with the proposed operation on channel 278C0 at Gulfport, Florida, would encompass 3,434,406 persons and an area of 21,615 sq. km.
- The 70 dBu area associated with the proposed operation on channel 278C0 at Gulfport, Florida, would encompass 2,702,459 persons and an area of 10,922 sq. km.
- The Community of Gulfport, Florida will be provided protected service from a multitude of stations.

Proposed Change to the Permit

The current community of license for WFUS is Bradenton, Florida, which is located in Manatee County, Florida, and has a 2000 U.S. Census population of 49,504 persons. Because the Permit is unbuilt, changing the Permit's community of license would not constitute the removal of service from Bradenton, Florida. The Permit's 60 dBu area is well served by many aural services. See *Figures 3 and 4*.

The proposed community of license for WFUS is Gulfport, Florida, which is located in Pinellas County, Florida, and has a 2000 U.S. Census population of 12,527 persons. Gulfport has no local FM or AM aural transmission broadcast service and, therefore, the proposed modification of the Permit would bring a first local aural transmission service to Gulfport.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 278C0 at Gulfport, Florida. The allotment reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments as a full 100 kW Class C0 allotment, except for the Permit's existing channel 268C allotment at Bradenton, Florida, for which this proposal is a mutually exclusive substitute.

Operation from the channel 278C0 reference site would provide the requisite city grade (70 dBu) signal to Gulfport, Florida. *Figure 2* is a map which depicts the city grade coverage (70 dBu) contour based on maximum Class C0 facilities (ERP 100 kW/HAAT 450 meters) at the proposed allotment reference site. As shown, all (100%) of Gulfport is located within the predicted 70 dBu contour.

Urbanized Area Considerations

The Permit's present and proposed 70 dBu contours encompass 100 percent of the Tampa, Florida Urbanized Area.

Services to Community

The community of Gulfport, Florida will be provided protected service from a multitude of other stations as demonstrated in *Figures 3 and 4*.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions.

Population and Area

The population within the FM primary service contour (60 dBu) was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids." The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

The channel and community of license of WFUS may be changed to channel 278C0 at Gulfport, Florida, in compliance with all applicable Commission rules. The community of Gulfport, Florida, would be provided with a first local aural transmission service, and, the community

of Bradenton, Florida, will continue to be served by a large number of aural services. Moreover, the area within the Permit's 60 dBu contour is not changing. Therefore, the applicant requests the minor modification of the Permit specifying operations on channel 278C0 at Gulfport, Florida.

Figure 1

Spacing Study at Allotment Reference Site

ComStudy 2.2 search of channel 278 (103.5 MHz Class C0) at 27-50-32.0 N, 82-15-45.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WFUS	BRADENTON	FL 278 C	0.00	281.00	90.0	-281.0
WFUS	BRADENTON	FL 278 C	10.23	281.00	257.4	-270.8
WQOL	VERO BEACH	FL 279 C2	178.29	176.00	93.4	2.3
WQOL	VERO BEACH	FL 279 C2	185.09	176.00	96.0	9.1
W280DW	BRANDON	FL 280 D	10.61	0.00	348.8	10.6
WMIB	FORT LAUDERDALE	FL 278 C	291.13	281.00	135.2	10.1
WMIB	FORT LAUDERDALE	FL 278 C	291.13	281.00	135.2	10.1
WMIB	FORT LAUDERDALE	FL 278 C	291.21	281.00	135.2	10.2
WRUF-FM	GAINESVILLE	FL 279 C1	207.34	196.00	356.5	11.3
WRUF-FM	GAINESVILLE	FL 279 C1	207.34	196.00	356.5	11.3
NEW	GREATER SUN CENTER	FL 276 D	11.63	0.00	215.2	11.6
NEW	APOLLO BEACH	FL 276 D	12.85	0.00	234.8	12.8
WVLG-LP	THE VILLAGES	FL 277 LP100	126.69	111.00	14.0	15.7
WFJV-LP	CITRONELLE	FL 277 LP100	129.74	111.00	346.2	18.7
NEW	GREATER SUN CENTER	FL 275 D	20.83	0.00	219.5	20.8
NEW	PLANT CITY	FL 275 D	21.69	0.00	21.9	21.7
WLOQ	WINTER PARK	FL 276 C3	108.66	87.00	42.0	21.7
WLOQ	WINTER PARK	FL 276 C3	111.34	87.00	45.7	24.3
WEKJ-LP	HOMOSASSA	FL 276 LP100	109.47	84.00	345.3	25.5
NEW	TAMPA	FL 276 D	28.31	0.00	311.1	28.3
NEW	ST. PETERSBURG	FL 281 D	35.71	0.00	274.5	35.7
WTKS-FM	COCOA BEACH	FL 281 C	142.40	105.00	54.5	37.4
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WTKS-FM	COCOA BEACH	FL 281 C	142.40	105.00	54.5	37.4

Figure 2
Proposed 60 and 70 dBu Contour Service

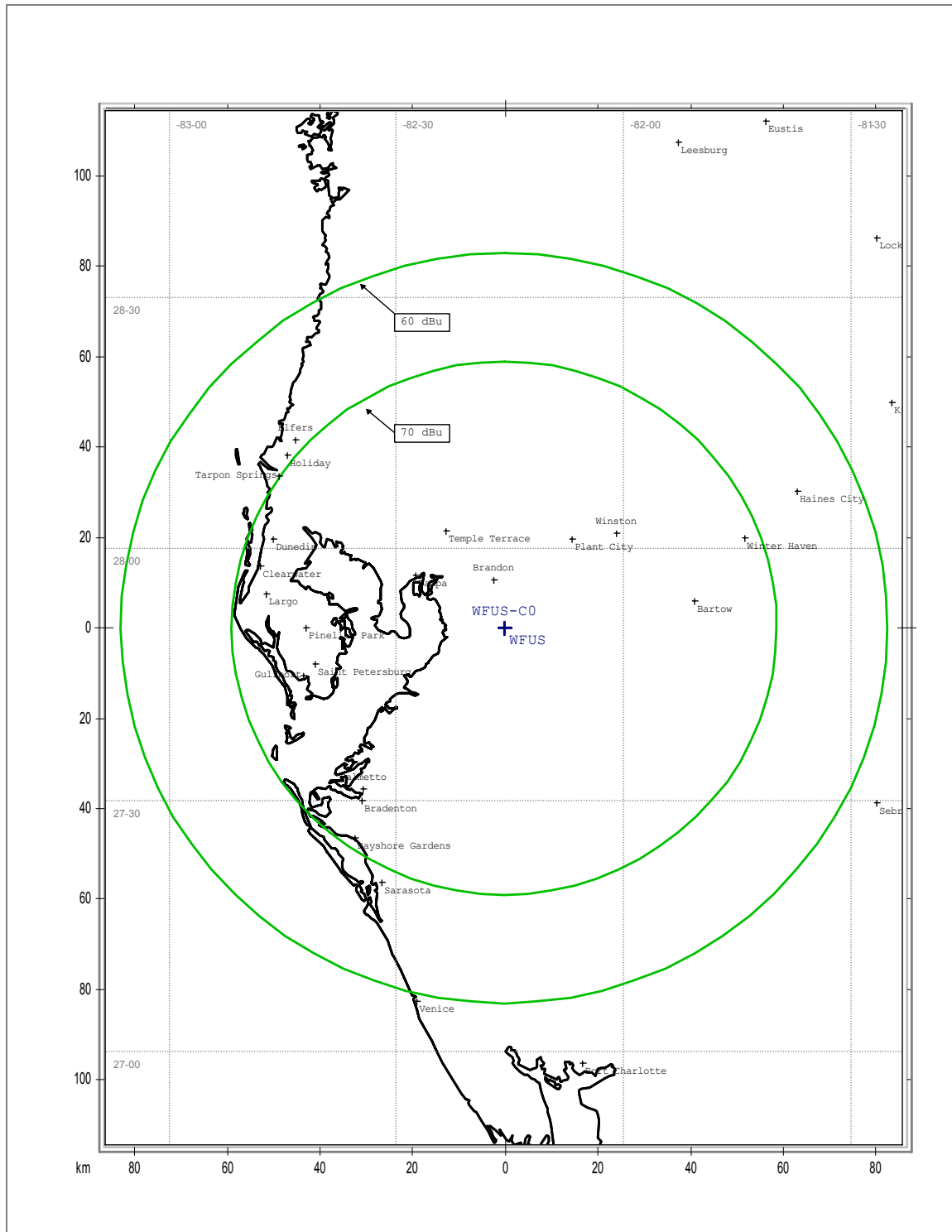


Figure 4

Tabulation of Protected Services to community.

Call Sign	Facility_id	City	State
WFUS-C0	63984	GULFPORT	FL
WUSF	69122	TAMPA	FL
WPOI	66013	ST. PETERSBURG	FL
WXGL	74199	ST. PETERSBURG	FL
WMNF	47459	TAMPA	FL
WBVM	5373	TAMPA	FL
WRBQ-FM	11943	TAMPA	FL
WCTQ	48672	SARASOTA	FL
WYUU	18512	SAFETY HARBOR	FL
WLLD	18527	HOLMES BEACH	FL
WWRM	74200	TAMPA	FL
WFTI-FM	21034	ST. PETERSBURG	FL
WSJT	51987	LAKELAND	FL
WQYK-FM	28619	ST. PETERSBURG	FL
WFLZ-FM	29732	TAMPA	FL
WBTP	41382	CLEARWATER	FL
WMTX	23078	TAMPA	FL
WBTP	41382	CLEARWATER	FL
WHPT	51986	SARASOTA	FL
WWRM	74200	TAMPA	FL
WXTB	11274	CLEARWATER	FL
WDUV	1178	NEW PORT RICHEY	FL
WXGL	74199	ST. PETERSBURG	FL
WTIS	74088	TAMPA	FL
WMGG	51971	LARGO	FL
WAMA	19055	TAMPA	FL
WBRD	63985	PALMETTO	FL
WWPR	60587	BRADENTON	FL
WWMI	11954	ST. PETERSBURG	FL
WWBA	41383	PINELLAS PARK	FL
WXYB	2918	INDIAN ROCKS BEACH	FL
WRXB	57478	ST. PETERSBURG BEACH	FL
WQYK	28629	SEFFNER	FL
WGUL	1177	DUNEDIN	FL
WDAE	74198	ST. PETERSBURG	FL
WGES	74558	ST. PETERSBURG	FL
WQBN	74155	TEMPLE TERRACE	FL
WSDV	48671	SARASOTA	FL
WTWD	26145	PLANT CITY	FL
WFLA	29729	TAMPA	FL
WTMP	74108	EGYPT LAKE	FL
WTBN	51985	PINELLAS PARK	FL
WHNZ	23077	TAMPA	FL
WLCC	71212	BRANDON	FL