

EXHIBIT 21 (Question 13)

Great Scott Broadcasting ("GSB") is aware that a construction permit (BPH-20010306ABC) has been granted for modification of facilities to WOSC(FM), Bethany Beach, DE. The WOSC(FM) construction permit is in conflict with GSB's original application (BPH-20010208AAT) and with this amendment. The undersigned is aware that GSB is seeking rescission of the WOSC(FM) construction permit, and therefore it has not otherwise been considered in this amendment.

EXHIBIT 21

ENGINEERING STATEMENT

This engineering statement has been prepared on behalf of Great Scott Broadcasting (“GSB”), licensee of FM radio station WKDB(FM), Laurel, DE and is in support of its minor amendment to application BPH-20010208AAT to reduce antenna height. No other changes are proposed.

At present WKDB-FM is licensed on Channel 237A (95.3 MHz) with 6 kW effective radiated power (ERP) and 100 meters antenna height above average terrain (HAAT). In February 2001, GSB proposed to relocate the WKDB(FM) transmitter site approximately 12 km south of its present location (BPH-20010208AAT). As stated in the WKDB(FM) application, the site proposed by GSB is an existing tower site currently being utilized by station WDIH(FM), Salisbury, MD. The existing tower at the proposed site is 55 meters above ground and 67 meters AMSL. GSB is now proposing to side-mount a common antenna for WKDB(FM) and WDIH(FM) on the existing WDIH(FM) tower without increasing its overall height above ground.

Antenna Site

The proposed tower site (existing WDIH tower) is located on Jersey Road at Hearne Lane, approximately 5 km south of Delmar, Wicomico County, MD. The geographic coordinates (NAD-27) corresponding to this site are as follows:

North Latitude: 38° 24' 28”

West Longitude: 75° 36' 16”

Antenna and Power Data

Effective Radiated Power:	6 kW (H)	6 kW (V)
Maximum Effective Radiated Power:	6 kW (H)	6 kW (V)
FM Antenna:	Non-Directional Two-Bay, Circularly Polarized	

FM Channel Allotment

Station WKDB(FM) has been allotted Channel 237A under Section 73.202 of the Commission's rules. GSB is not seeking any change in the station's operating frequency and will continue to operate on Channel 237A at the proposed (existing WDIH) antenna site.

Community Coverage

The proposed 70 dBu (3.16 mV/m) contour based on FCC coverage prediction method (Section 73.313) does not encompass Laurel, DE (principal community). Since the terrain around the antenna site is relatively flat, a supplemental showing based on the FCC point-to-point method (FCC PTP) has been conducted to demonstrate that the WKDB(FM) proposal would provide 70 dBu service to 100% of Laurel, Delaware.

The attached Exhibit 22 shows the proposed 70 dBu contour based on the FCC method and Exhibit 22A shows the 70 dBu contour based on the FCC PTP method. The FCC contour prediction method is based on a terrain roughness of 50 meters and the terrain roughness of the Eastern Shore of DE is 10 meters. Therefore, the FCC contour prediction method understates the distance to the predicted contours.

Based on the supplemental showing, we believe that the WKDB(FM) proposal complies with Section 73.315 of the Commission's Rules concerning principal community service and does not require a waiver. However, should the Commission deem a waiver of Section 73.315 be required, it is respectfully requested.

Main Studio Location

There will be no change in the licensed main studio location of station WKDB(FM).

FM Allocation Situation

The proposed amendment to the pending application to specify reduced antenna height does not impact the WKDB(FM) allocation situation.

Environmental Statement

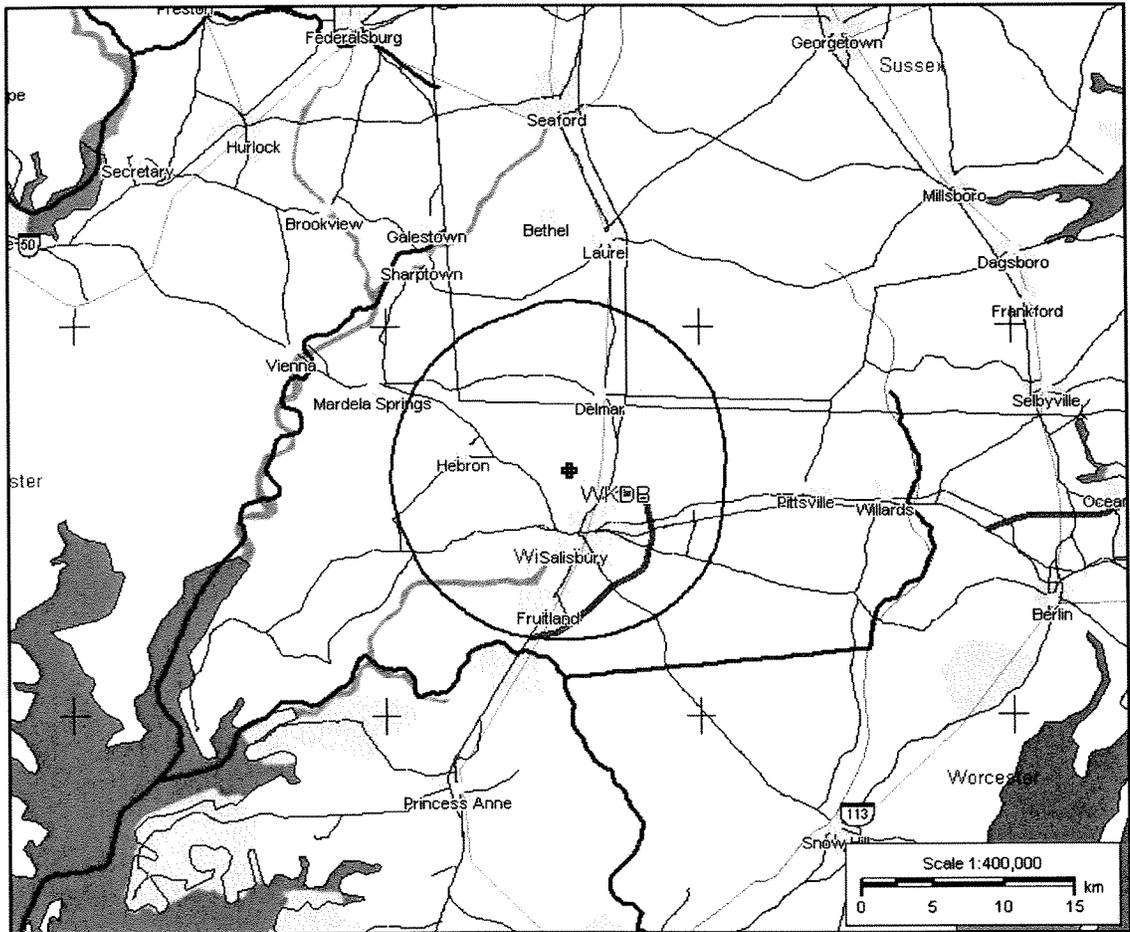
Since this proposal does not require any change in the existing site and or tower, the environmental concerns listed in Section 1.1307(a) of the Commission's Rules are not pertinent; consequently, those issues have not been addressed in this proposal.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OST Bulletin No. 65 dated August 1997. For a combined effective radiated power of 12 kW and an antenna radiation center of 53 meters above ground level, the proposed WKDB(FM) operation would have a maximum of 38.5 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RF field level at 2 meters above ground level based on a downward relative field of 0.5. Since the proposed site is also the existing antenna site of station WDIH(FM), its impact on the RF Fields have also been determined. For the combined effective radiated power of 0.76 kW and antenna radiation center of 53 meters above ground level, the WDIH(FM) operation would have a minimum of 2.4 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RF field level at 2 meters above ground level based on a downward relative field of 0.5. The Commission's guidelines for the FM band are $1,000 \mu\text{W}/\text{cm}^2$ for the occupational/controlled and $200 \mu\text{W}/\text{cm}^2$ for the general population/uncontrolled environment. Therefore, members of the public and personnel working around the proposed WKDB(FM) operation or existing WDIH(FM)

facilities would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station WKDB(FM) in coordination with WDIH(FM) will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, either by reducing or turning off the power, as appropriate.

For the reasons stated above, we believe this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.

WKDB
BPH-20010208AAT
Latitude: 38-24-28 N
Longitude: 075-36-16 W
ERP: 6.00 kW
EIRP: 9.84 kW
Channel: 237
Frequency: 95.3 MHz
AMSL Height: 65.0 m
Elevation: 12.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None



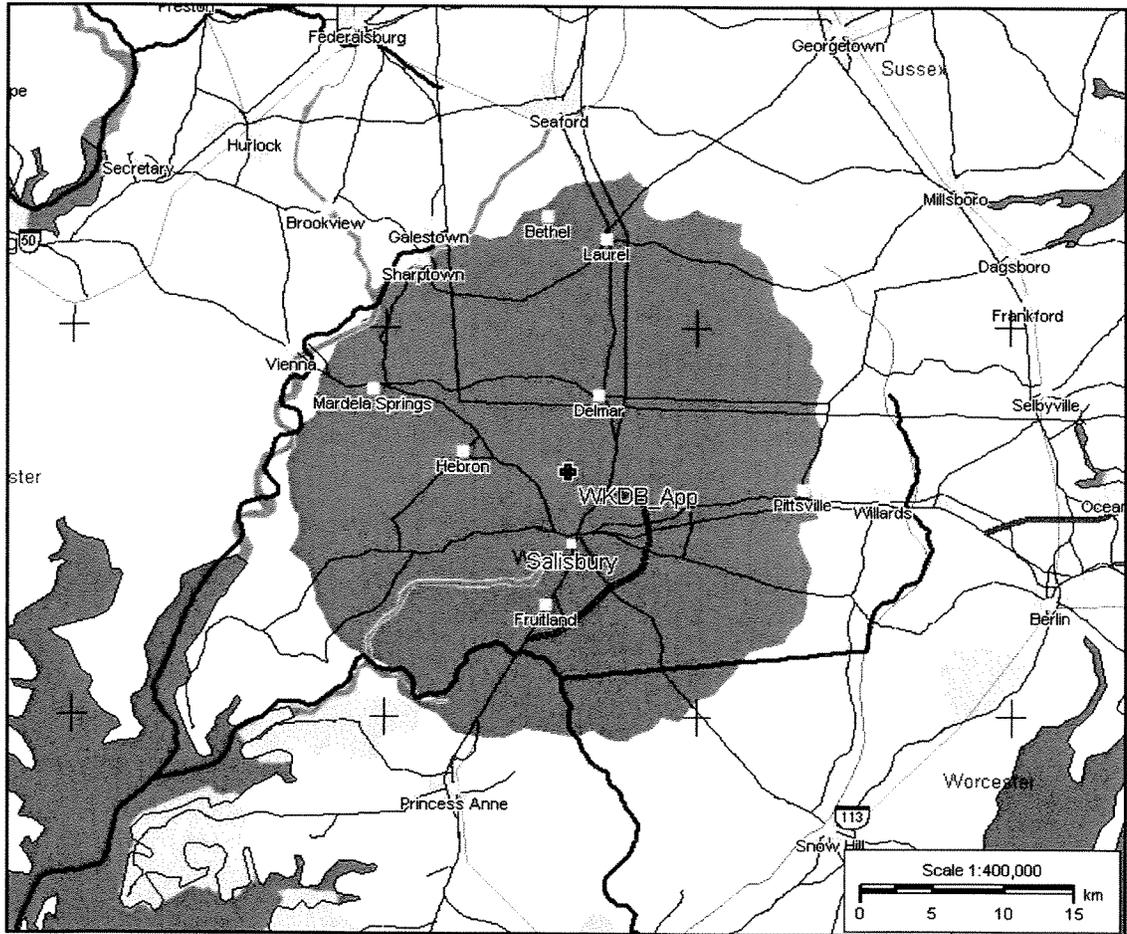
Proposed 70 dBu (3.14 mV/m) Contour Based on FCC Contour Method

EXHIBIT 22

WKDB_App

BPH-20010208AAT
Latitude: 38-24-28 N
Longitude: 075-36-16 W
ERP: 6.00 kW
EIRP: 9.84 kW
Channel: 237
Frequency: 95.3 MHz
AMSL Height: 65.0 m
Elevation: 12.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FM PTP

70.0 dBu



Proposed 70 dBu (3.14 mV/m Contour Based on FCC Point-To-Point Method

EXHIBIT 22A