

**MINOR CHANGE APPLICATION**  
**MILLER COMMUNICATIONS, INC.**  
**WWBD (FM) RADIO STATION**  
**CH 239C3 - 95.7 MHZ - 25.0 KW**  
**BAMBERG, SOUTH CAROLINA**  
**October 2003**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), proposed assignee of FM radio station WWBD, Channel 239A, Bamberg, South Carolina. Miller herein proposes to make changes in the facilities of WWBD by upgrading the facility from Class A to Class C3, increasing the effective radiated power, correcting the site coordinates and utilizing a directional antenna system. Further this application is filed concurrent and contingent with a minor change application filed by WQZY, Channel 240C0, Dublin, Georgia, that specifies reference allocation coordinates.

At the actual site proposed for the upgrade, Channel 239C3 does not meet the Commission's minimum distance separation requirements to all licensed, proposed or applied for facilities. As such, a clear reference site has been designated, which meets the requirements of §73.207 and from which a 3.16 mV/m contour will be placed over the community of Bamberg.<sup>1</sup> At the proposed application site for WWBD on Channel 239C3, there is a shortspace to WIXV, Savannah, Georgia, and to WQZY, Channel 238C0, Dublin, Georgia. Therefore, processing pursuant to §73.215 is respectfully requested. See Exhibit A for details.

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1) The clear allocation site requires the downgrade of station WXRC, Channel 239C, Hickory, North Carolina, to Channel 239C0.

To accommodate this proposed upgrade, Miller proposes to downgrade WXRC, Hickory, North Carolina, from Class C to Class C0. In the Second Report and Order in MM Docket #98-93, a new Class of FM station was created, Class C0. Pursuant to Note #4, §73.3573, “A Class C station operating with a height above average terrain (“HAAT”) of less than 451 meters is subject to re-classification as a Class C0 station upon the filing of a triggering application (or allocation) for a construction permit that is short-spaced to such Class C station under §73.207, but would be fully spaced to such a station as a Class C0 assignment...” This application for WWBD proposes to upgrade the WWBD facility/allocation reference coordinates based on WXRC considered a Class C0 rather than a Class C facility. There are no other Class C3 channels that meet the Commission’s minimum distance separation requirements from the proposed WWBD reference coordinates. A copy of this application is being served on the licensee of WXRC. Therefore, this application complies with Note #4 in §73.3573 of the rules.

Miller proposes to install the antenna for WWBD on an existing tower. This tower has been registered with the FCC and assigned Antenna Structure Registration Number 1047815. Therefore, the Federal Aviation Administration has not been apprised of this proposal.

Since the WWBD antenna will be located on a tower with an AM station, the worksheets associated with Form 301 could not be used to demonstrate compliance with the Commission's radio frequency radiation limits. Therefore, a study was undertaken to show the proposed WWBD facilities are in compliance with the Commission's RFR rules (Exhibit B).

Due to the co-location of WWBD with WRIT (AM), the AM station will determine operating power by the indirect method during construction. The impedance of WRIT will be monitored and, following construction, an application to return the AM station to direct power measurement will be filed, as necessary. All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to the applicant and is available for submission to the Commission upon request.