

MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
WNAM AM RADIO STATION
has: 1280 kHz - 5.0 kW - DA2
req: 1280 kHz - 5.0/50.0 kW - DA2
NEENAH-MENASHA, WISCONSIN
February 2009

This Technical Exhibit supports the application by Cumulus Licensing LLC ("Cumulus), licensee of AM Radio Station WNAM, 1280 kHz, Neenah-Menasha, Wisconsin, to make minor changes to the broadcast facility. WNAM is presently authorized to operate with 5.0 kilowatts full time, utilizing separate directional antenna systems during daytime and nighttime hours. Cumulus proposes to modify the daytime operation of WNAM to operate with 50.0 kilowatts effective radiated power, while maintaining the existing nighttime operation and power of 5.0 kilowatts. There is no proposed change in site, antenna structures or city of license.¹

The proposed tower site consists of five existing towers, with one tall structure and four shorter ones. Since the shorter towers are less than 200 feet they do not require FAA clearance or FCC registration.² The tall tower is registered with the Commission under Antenna Structure Registration Number 1035547. Since there are no structural changes to any of the towers, the FAA has not been notified of the proposed changes.

Cumulus proposes to increase the transmitter power of WNAM with a new directional antenna system to preclude increasing interference to other co- and adjacent-channel AM

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- 1) The proposed facility is the same as that authorized in BP-20050725AEZ.
 - 2) Determined using the Commission's TOWAIR program.

broadcast stations. Of note, overlap of allocation contours exists between WNAM, as licensed, and 1st adjacent channel stations WMKT, Charlevoix, Michigan, and WMCS, Greenfield, Wisconsin. With regard to WMKT, we note the interference to the WMKT construction permit operation (BP-20041027ABJ) lies entirely over the unpopulated South Manitou Island. In its previous application (BP-20050725AEZ), WNAM requested and received a waiver of the interference rules over this island. In addition, WMKT requested and received a similar waiver in the grant of its 27.0 kilowatt non-directional application. A similar and continuing waiver of the rules with regard to this overlap is requested. It is proposed to reduce the interference between WNAM and WMCS, as detailed in Exhibit #2C2.

There is no change to the physical antenna system in use during daytime hours for WNAM. Therefore, there are no site photographs or property plat submitted with this application, as these details can be found in the WNAM FCC Station File.

The population within the proposed WNAM daytime 1000 mV/m contour is less than 300 persons.³ This contour is shown in Exhibit #1C. In response to all complaints of blanketing interference, Cumulus will undertake steps to mitigate the blanketing effects in accordance with the requirements of §73.88.

There are no AM broadcast facilities within 3.0 kilometers of the proposed/existing WNAM transmitter site. Within 10.0 kilometers, there are several FM and television proposals or licenses (Exhibit #1K).

3) 2000 Census

The present and proposed daytime 1000 mV/m, 5.0 mV/m, 2.0 mV/m and 0.5 mV/m service contours are shown in Exhibit #1A through #1C. The proposed 5.0 mV/m city grade service contour completely encompasses the cities of Neenah and Menasha, Wisconsin.

Due to the relative close proximity of AM station WMKT, 1270 kHz, Charlevoix, Michigan (BP-20041027ABJ), field measurements along critical radials were extracted from the WMKT application for power increase to determine the actual, as opposed to theoretical, ground conductivities in the area. The measurements were conducted by Mr. Justin Asher as detailed in the WMKT application. The graphic analysis and tabulation of these measurements is not included in this application, but may be found in the WMKT FCC Station file.

We have tried to be as accurate as possible in the preparation of this application. All information contained in this application was extracted from the CDBS database. We assume no liability for omissions or errors in this source. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone at 912-638-8028 or by email at rsg@grahambrock.com.