

MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
WFAF (FM) RADIO STATION
CH 292A - 106.3 MHZ - 0.98 KW
MOUNT KISCO, NEW YORK
August 2006

EXHIBIT A

WFAF Shortages

As shown on Exhibit A1, operating on Channel 292A at its licensed transmitter site, WFAF does not meet the Commission's minimum distance separation requirements to four other stations: WBLI, WLTW, WHCY and WHTG-FM. WFAF, WBLI and WLTW were each authorized prior to November 16, 1964, and have remained shortspaced since that time. As such, the shortages between these stations are addressed pursuant to §73.213(a) of the rules as pre-1964 grandfathered short spaced stations. The shortages between WFAF and WHCY and between WFAF and WHTG-FM are based on the change in spacing rules made in 1989 to increase the maximum effective radiated power for Class A stations from 3.0 kilowatts to 6.0 kilowatts. WFAF, WHCY and WHTG-FM are operating with power at or below the equivalent power of 3.0 kilowatts at 100.0 meters height above average terrain. As such, §73.213(c) of the rules applies to this shortage.

Compliance with §73.213(a), Pre-1964 Grandfathered Shortspaces

As noted above, WFAF, WBLI and WLTW were each authorized prior to November 16, 1964. Further, the stations have remained shortspaced since that time. As such, each of these

shortages is considered a pre-1964 grandfathered shortspace pursuant to §73.213(a) of the rules. Because of the channel relationship between WFAF and WLTW (second adjacent Class A to Class B), the shortage to WLTW is not considered pursuant to §73.213(a)(4) of the rules.

Based on the proposed relocation of WFAF, as shown on Exhibit A2, the distance between WFAF and WBLI is slightly reduced. Since WFAF has a pre-1964 grandfathered shortage with WBLI, any change requires an evaluation of delivered and received interference between the stations, based on the licensed WFAF facility in comparison to the proposed WFAF facility. Exhibit A3 shows the present interfering contour of the licensed WFAF overlaps with the protected contour of WBLI and depicts the depth of interference caused to WBLI.¹ Using the ratio method, WBLI receives interference to 330,198 persons within 727.8 square kilometers from the licensed operation of WFAF. Exhibit A4 is a map depicting the depth of interference to the licensed WFAF facility as a result of the licensed operation of WBLI. Based on the depth of interference, WFAF's licensed facility receives interference to 148,247 persons in 147.2 square kilometers from the operating facilities of WBLI.

As a result of the relocation and change in the facilities of WFAF, the interference to WBLI will change slightly, as shown on Exhibit A5. Based on the relocated WFAF, only 329,356 persons in 732.1 square kilometers within the WBLI 54 dBu contour will receive interference from the proposed WFAF, which is a decrease of 1,399 persons and a slight increase

1) The depth of interference is based on a ratio of desired to undesired contours based on the respective class and channel of the interfering stations.

in area of 4.3 square kilometers.² Further, as shown on Exhibit A6, as a result of the proposed change, WFAF will receive interference to 120,440 persons in 155.0 square kilometers from the operating facilities of WBLI. This represents a reduction of 27,807 persons. There is a slight increase in the interference area of 7.8 square kilometers; however, this occurs over water.³ A tabulation of the delivered and received interference is attached as Exhibit A7.

Based on the reduction of interference to and from WBLI, a net reduction of interference received occurs as a result of the proposed relocation of WFAF. As such, this proposal is in compliance with 73.213(a) of the rules.

Compliance with §73.213(c), 3.0 Kilowatt Grandfathered Stations

As indicated on Exhibit A1, from its licensed site WFAF does not meet the requirements of §73.207 of the rules to WHCY, Channel 292A, Blairstown, New Jersey. The two sites are located 108.7 kilometers apart. Both WFAF and WHCY are operating as, or slightly below, an equivalent 3.0 kilowatt Class A facility. The shortage that exists between the stations was created as a result of the increase of spacing requirements for Class A stations when the power for Class A stations was increased from 3.0 kilowatts to 6.0 kilowatts in MM Docket 88-375. Both stations were authorized prior to October 1, 1989 and are, therefore, considered grandfathered 1989 3.0 kilowatt Class A stations, pursuant to §73.213(c). As such, the stations must maintain a separation 105.0 kilometers, as noted in §73.213(a)(1) of the rules.

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- 2) The increase occurs over Long Island Sound, an unpopulated area.
 - 3) The increased area is over Long Island Sound.

As a result of the relocation of WFAF to its proposed site, the station will be located 109.8 kilometers from WHCY. As a grandfathered 3.0 kilowatt station, WFAF meets the required 105.0 kilometer separation from WHCY. Therefore, this relocation complies with §73.213(c)(1) of the rules with respect to WHCY.

As indicated on Exhibit A1, from its licensed site WFAF does not meet the requirements of §73.207 of the rules to WHTG-FM, Channel 292A, Eatontown, New Jersey. The two sites are located 107.35 kilometers apart. Both WFAF and WHTG-FM are operating as, or slightly below, an equivalent 3.0 kilowatt Class A facility.⁴ The shortage that exists between the stations was created as a result of the increase of spacing requirements for Class A stations when the power for Class A stations was increased from 3.0 kilowatts to 6.0 kilowatts in MM Docket 88-375. Both stations were authorized prior to October 1, 1989 and are, therefore, considered grandfathered 1989 3.0 kilowatt Class A stations, pursuant to §73.213(c). As such, the stations must maintain a separation 105.0 kilometers, as noted in §73.213(a)(1) of the rules.

As a result of the relocation of WFAF to its proposed site, the station will be located 106.4 kilometers from WHTG-FM. As a grandfathered 3.0 kilowatt station, WFAF meets the required 105.0 kilometer separation from WHTG-FM. Therefore, this relocation complies with §73.213(c)(1) of the rules with respect to WHTG-FM.

4) WHTG-FM is operating under a §73.215 authorization, however, in BMPH-20020910AAL and in BLH-20040209ABA, WHTG-FM addressed the shortage to WFAF under §73.213(c). WFAF does not request processing under the contour protection criteria of §73.215. The spacing between WFAF and WHTG-FM has been, and will remain, 105 kilometers or more, as required under §73.213(c).

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EXHIBIT A1

Clearance Study for WFAF Mount Kisco, New York
Using Licensed Site as Reference

CLASS = A

REFERENCE	Current Spacings						DISPLAY DATES	
41 11 56 N. 73 41 37 W.	Channel 292 - 106.3 MHz						DATA 08-05-06	SEARCH 08-08-06
Call	Channel	Location					FCC	Margin
	Lat.	Lng.	Ant	Power	Azi	Dist HAAT		
WFAF	LIC 292A	Mount Kisco		NY	0.0	0.00	115.0	-115.00
	41 11 56	73 41 37	CN	1.400 kW		134 M		
	Cumulus Licensing LLC			BMLH-19830711AL				
* WBLI	LIC-D 291B	Patchogue		NY	125.7	67.73	113.0	-45.27
	40 50 32	73 02 25	DEX	49.000 kW		152 M		
	CXR Holdings, L.l.c.			BMLH-20030521AEF				
* WLTW	LIC 294B	New York		NY	206.2	55.76	69.0	-13.24
	40 44 54	73 59 10	CN	6.000 kW		415 M		
	AMFM Radio Licenses, L.L.C.			BLH-19940203KA				
+ WHTGFM	LIC-N 292A	Eatontown		NJ	197.8	107.35	105.0	2.35
	40 16 41	74 04 51	NCX	1.100 kW		161 M		
	Press Communications, LLC			BMLH-20060524ABV				
+ WHCY	LIC 292A	Blairstown		NJ	261.5	108.70	105.0	3.70
	41 02 53	74 58 21	CN	0.430 kW		262 M		
	CC Licenses, LLC			BLH-19940104KA				
WCAA	LIC 290B1	Newark		NJ	206.2	55.76	48.0	7.76
	40 44 54	73 59 10	C	0.610 kW		373 M		
	WADO-AM License Corp.			BLH-19970327KA				
WHCN	LIC-D 290B	Hartford		CT	60.0	81.70	69.0	12.70
	41 33 47	72 50 42	DCN	16.000 kW		264 M		
	Capstar TX Limited Partnership			BLH-19890323KA				
WCCCFM	LIC 295B	Hartford		CT	48.0	100.01	69.0	31.01
	41 47 48	72 47 52	C	23.000 kW		221 M		
	Marlin Broadcasting of Hart.			BLH-20010911AAC				
WPDA	LIC 291A	Jeffersonville		NY	308.0	112.45	72.0	40.45
	41 48 57	74 45 42	CN	1.600 kW		191 M		
	Cumulus Licensing LLC			BLH-19930203KD				
WEIB	LIC 292A	Northampton		MA	32.6	155.59	115.0	40.59
	42 22 25	72 40 26	C	3.000 kW		88 M		
	Cutting Edge Broadcasting			BLH-19980318KB				

* Note: This shortage is a pre-1964 grandfathered shortspace, see Exhibit A.
+ Note: This shortage is a 3.0 kilowatt grandfathered shortage, see Exhibit A.

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EXHIBIT A2

Clearance Study for WFAF Mount Kisco, New York
Using Proposed Site as Reference

REFERENCE		Channel 292 - 106.3 MHz		Current Spacings		DISPLAY DATES		
41 11 09 N.						DATA	08-05-06	
73 40 41 W.						SEARCH	08-08-06	
Call	Channel	Location	Ant	Power	Azi	Dist	FCC	Margin
	Lat.	Lng.				HAAT		
WFAF	LIC 292A	Mount Kisco		NY	318.1	1.95	115.0	-113.05
	41 11 56	73 41 37	CN	1.400 kW		134 M		
	Cumulus Licensing LLC			BMLH-19830711AL				
* WBLI	LIC-D 291B	Patchogue		NY	125.3	65.83	113.0	-47.17
	40 50 32	73 02 25	DEX	49.000 kW		152 M		
	CXR Holdings, L.L.C.			BMLH-20030521AEF				
* WLTW	LIC 294B	New York		NY	208.1	55.07	69.0	-13.93
	40 44 54	73 59 10	CN	6.000 kW		415 M		
	AMFM Radio Licenses, L.L.C.			BLH-19940203KA				
+ WHTGFM	LIC-N 292A	Eatontown		NJ	198.7	106.39	105.0	1.40
	40 16 41	74 04 51	NCX	1.100 kW		161 M		
	Press Communications, LLC			BMLH-20060524ABV				
+ WHCY	LIC 292A	Blairstown		NJ	262.4	109.79	105.0	4.49
	41 02 53	74 58 21	CN	0.430 kW		262 M		
	CC Licenses, LLC			BLH-19940104KA				
WCAA	LIC 290B1	Newark		NJ	208.1	55.07	48.0	7.07
	40 44 54	73 59 10	C	0.610 kW		373 M		
	WADO-AM License Corp.			BLH-19970327KA				
WHCN	LIC-D 290B	Hartford		CT	58.6	81.31	69.0	12.31
	41 33 47	72 50 42	DCN	16.000 kW		264 M		
	Capstar TX Limited Partnership			BLH-19890323KA				
WCCCFM	LIC 295B	Hartford		CT	46.9	100.03	69.0	31.03
	41 47 48	72 47 52	C	23.000 kW		221 M		
	Marlin Broadcasting of Hart.			BLH-20010911AAC				
WPLJ	LIC 238B	New York		NY	208.1	55.07	15.0	40.07
	40 44 54	73 59 10	CX	6.700 kW		408 M		
	WPLJ-FM Radio, Inc.			BMLH-20050216ACG				
WEIB	LIC 292A	Northampton		MA	31.9	156.12	115.0	41.12
	42 22 25	72 40 26	C	3.000 kW		88 M		
	Cutting Edge Broadcasting			BLH-19980318KB				

* Note: This shortage is a pre-1964 grandfathered shortspace, see Exhibit A.
+ Note: This shortage is a 3.0 kilowatt grandfathered shortage, see Exhibit A.

Graham Brock, Inc. - Broadcast Technical Consultants

WFAF
BMLH-19830711AL
Latitude: 41-11-56 N
Longitude: 073-41-37 W
ERP: 1.40 kW
Channel: 292A
Frequency: 106.3 MHz
AMSL Height: 260.0 m

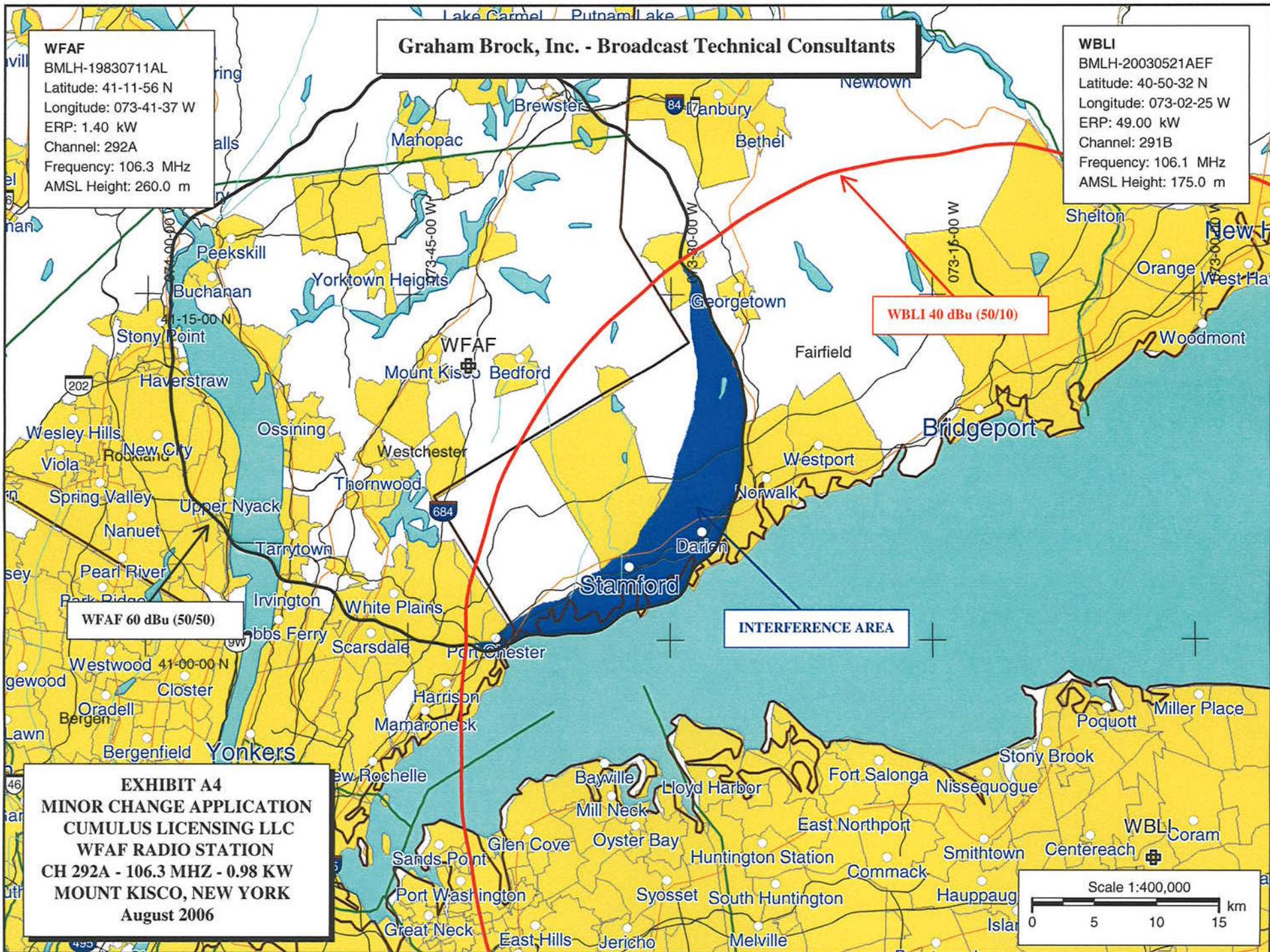
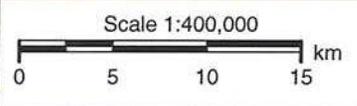
WBLI
BMLH-20030521AEF
Latitude: 40-50-32 N
Longitude: 073-02-25 W
ERP: 49.00 kW
Channel: 291B
Frequency: 106.1 MHz
AMSL Height: 175.0 m

WBLI 40 dBu (50/10)

WFAF 60 dBu (50/50)

INTERFERENCE AREA

EXHIBIT A4
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Graham Brock, Inc. - Broadcast Technical Consultants

WFAF Proposed
Latitude: 41-11-09 N
Longitude: 073-40-41 W
ERP: 0.98 kW
Channel: 292A
Frequency: 106.3 MHz
AMSL Height: 260.9 m

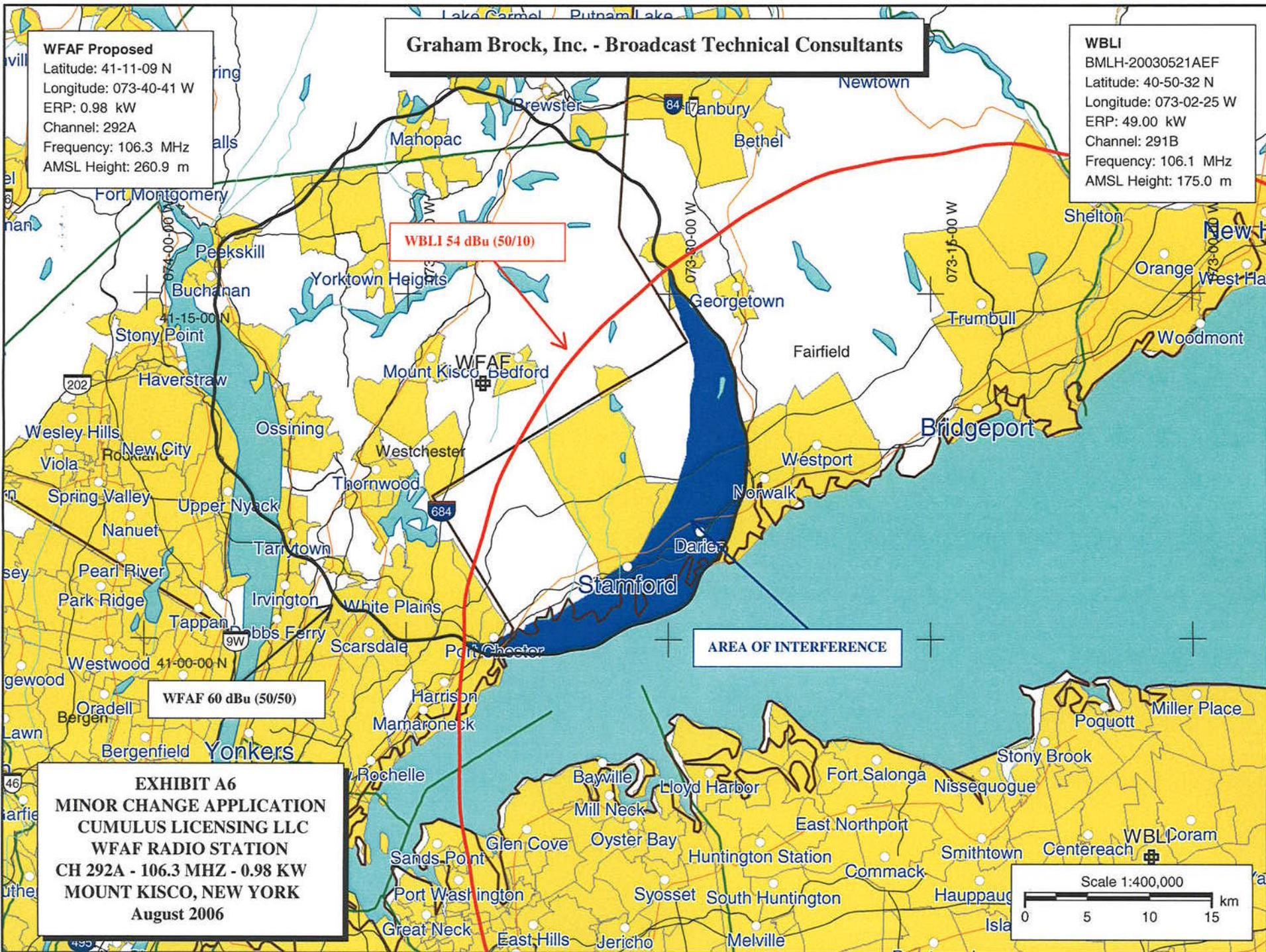
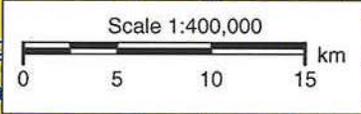
WBLI
BMLH-20030521AEF
Latitude: 40-50-32 N
Longitude: 073-02-25 W
ERP: 49.00 kW
Channel: 291B
Frequency: 106.1 MHz
AMSL Height: 175.0 m

WBLI 54 dBu (50/10)

WFAF 60 dBu (50/50)

AREA OF INTERFERENCE

EXHIBIT A6
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EXHIBIT A7

§73.213(a) Interference Analysis

<u>Station</u>	Existing Interference Delivered by WFAF:		Existing Interference Received by WFAF:	
	<u>Pop</u>	<u>Area (sq. km)</u>	<u>Pop</u>	<u>Area (sq. km)</u>
WBLI	330,198	727.8	148,247	147.2

<u>Station</u>	Proposed Interference Delivered by WFAF:		Proposed Interference Received by WFAF:	
	<u>Pop</u>	<u>Area (sq. km)</u>	<u>Pop</u>	<u>Area (sq. km)</u>
WBLI	329,356	732.1	120,440	155.0
Amt of Change	-842	+ 4.3	-27,807	+7.8