

MODIFY BPFT-20080110ACY
CUMULUS LICENSING LLC
W278AA FM TRANSLATOR STATION
CH 280D - 103.9 MHZ - 0.099 KW
MADISON, ALABAMA
October 2008

TECHNICAL STATEMENT

This technical statement was prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of FM translator station W278AA, Channel 278D, Madison, Alabama. Cumulus also holds a permit which authorizes a change to Channel 280D and the use of a directional antenna for the translator (BPFT-20080110ACY). Cumulus seeks to modify the permit to allow it use an alternate antenna for the W278AA translator. The original model, a Scala CA2-FM/CP, cannot be delivered prior to the date on which the translator must return to the air. There, a more readily available Scala CA5-FM/CP/RM will be used. This change is to allow Cumulus to restore the operation of the translator after being displaced by the commencement of operation of WHWT, Channel 278A, New Hope, Alabama. As such, expedited processing is respectfully requested. The W278AA facility will continue to rebroadcast the signal of co-owned station WWFF-FM. Since the WWFF-FM 60 dBu contour encompasses the 60 dBu contour of the proposed W278AA, as shown on Exhibit A2, this translator is considered a fill-in translator.

This application proposes to implement the change in channel and power at the existing W278AA site.¹ As such, the Federal Aviation Administration was not apprised of this proposal.

1) There is a one second difference in North Latitude between the proposed coordinates and licensed W278AA coordinates, which is due to a correction to make the coordinates agree with the tower registration.

The structure has been registered and assigned Antenna Structure Registration Number 1036633. Attached as Exhibit B is a study demonstrating that the proposed W278AA translator on Channel 280D will not cause interference to any full service station, nor will interference be delivered to or received from any existing FM translator station or LPFM application. It is noted that the proposed translator will be inside the 60 dBu contour of an FM station licensed to Cumulus. As shown on Exhibit B1, there is no actual interference, since there is no population within the interference area.

Finally, since the proposed translator will be co-located with other FM stations and LPTV stations, it was not possible to use the worksheets associated with FCC Form 349 to show the proposal meets the Commission's radio frequency radiation limits. Therefore, attached as Exhibit C is a study that shows the proposed facility is in compliance with the FCC's RF exposure limits.

All data regarding broadcast facilities was extracted from the CBDS database. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.