

MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
WDZZ-FM RADIO STATION
CH 224A - 92.7 MHZ - 3.0 KW
FLINT, MICHIGAN
August 2006

EXHIBIT A

WDZZ-FM Shortages

As shown on Exhibit A1, WDZZ-FM, operating on Channel 224A at its licensed transmitter site, does not meet the Commission's minimum distance separation requirements (§73.207) to three other stations: WJZL, Channel 224A, Charlotte, Michigan; WJSZ, Channel 223A, Ashley, Michigan; and WBGV, Channel 223A, Marlette, Michigan. Each of these channels, including Channel 224A at Flint, Michigan, was allotted under the former 3.0 kilowatt rules. The spacing rules were changed in MM Docket 88-375 to enable Class A stations to operate with a maximum effective radiated power of 6.0 kilowatts. WDZZ-FM, WJZL, WJSZ and WBGV are each operating with a power of 3.0 kilowatts at 100 meters height above average terrain, or its equivalent.

WDZZ-FM will maintain its facility as a 3.0 kilowatt Class A. As such, a relocation of WDZZ-FM can be made using the former 3.0 kilowatt spacing requirements, now contained in §73.213(c)(1) of the rules, with respect to WJZL, WJSZ and WBGV. A separation of 105.0 kilometers is needed for co-channel Class A stations, and a separation of 64.0 kilometers is needed for first adjacent Class A stations. As noted on Exhibit A2, WDZZ-FM, from its

proposed site will meet the former distance requirements to WJSZ (separated by a distance of 63.78 kilometers, which rounds to 64.0) and WBGV (separated by a distance of 64.53 kilometers). It is noted that WDZZ-FM from its licensed site (Exhibit A1) is located only 99.71 kilometers from WJZL. From its proposed site, the distance is improved to 100.83 kilometers. WJZL was originally moved to its present licensed site through a waiver of the spacing rules, as they existed at that time (BPH-10697).¹As a result of the relocation, WDZZ-FM will increase the distance between the stations, and it is believed that WDZZ-FM meets the necessary spacing requirements to the licensed facility of WJZL as a 3.0 kilowatt Class A facility.²

Therefore, this relocation complies with §73.213(c)(1) of the rules with respect to WJZL, WJSZ and WBGV, and with §73.207 towards all remaining stations.

1) Under BMPH-790712AA.

2) WJZL was ordered to Channel 225A at Grand Ledge, Michigan and holds a permit to implement service to the new community of license (BPH-20051205ADE). In the event that WJZL has not commenced operation with its new facility at Grand Ledge, Cumulus respectfully requests that its requested permit for WDZZ-FM not be conditioned regarding implementation of service WJZL at Grand Ledge.

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EXHIBIT A1

Clearance Study for WDZZ-FM Flint, Michigan
Using Present Licensed Site as Reference

REFERENCE									
43 00 57 N.					CLASS = A			DISPLAY DATES	
83 41 24 W.					Current Spacings			DATA 08-05-06	
----- Channel 224 - 92.7 MHz -----									
Call	Channel	Location			Azi	Dist	FCC	Margin	
	Lat.	Lng.	Ant	Power		HAAT			

WDZZFM	LIC 224A	Flint		MI	0.0	0.00	115.0	-115.00	
	43 00 57	83 41 24	CN	3.000 kW		78 M			
	Cumulus Licensing LLC			BLH-19790919AG					
+ WJZL	LIC 224A	Charlotte		MI	245.7	99.71	115.0	-15.29	
	42 38 31	84 47 55	CN	1.500 kW		142 M			
	Rubber City Radio Group, Inc.			BMLH-19940610KA					
* WJSZ	LIC 223A	Ashley		MI	286.9	64.64	72.0	-7.36	
	43 10 56	84 27 03	CN	2.000 kW		122 M			
	KROL Communications Inc.			BLH-19940323KB					
* WBGV	LIC 223A	Marlette		MI	62.5	65.71	72.0	-6.29	
	43 17 10	82 58 17	C	3.000 kW		100 M			
	GB Broadcasting Company			BLH-19990621KC					
WDRQ	LIC-D 226B	Detroit		MI	146.4	72.56	69.0	3.56	
	42 28 16	83 12 03	DCN	26.500 kW		204 M			
	ABC Radio Detroit, LLC			BLH-19860613KB					
WJZL.C	CP 225A	Grand Ledge		MI	246.2	77.25	72.0	5.25	
	42 43 58	84 33 13	CX	4.600 kW		114 M			
	Rubber City Radio Group, Inc.			BPH-20051205ADE					
CJBXFM	OPE 224B	London		ON	91.3	212.99	190.0	22.99	
	42 56 40	81 04 48	HN	50.000 kW		121 M			
WMXD	LIC-Z 222B	Detroit		MI	145.0	92.55	69.0	23.55	
	42 19 55	83 02 42	ZCN	45.000 kW		146 M			
	AMFM Radio Licenses, L.L.C.			BLH-19970303KA					
WIDL	LIC 221A	Caro		MI	28.5	58.88	31.0	27.88	
	43 28 51	83 20 31	CN	6.000 kW		97 M			
	Edwards Communications LC			BLH-19920410KA					
AL221	RSV 221C3	Cass City		MI	32.3	82.17	42.0	40.17	
	43 38 20	83 08 38		25.000 kW		100 M			
				RM-10060					
* WQTX	LIC 221A	St. Johns		MI	259.4	73.46	31.0	42.46	
	42 53 29	84 34 27	CN	4.000 kW		122 M			
	Rubber City Radio Group			BLH-19900905KA					

+ Note: This shortage is based on a change a waiver granted to WJZL (BMPH-790712AA), as well as the change in the Commission's rules for 6.0 kilowatt Class A facilities.

* Note: This shortage is based on a change in the Commission's rules for 6.0 kilowatt Class A facilities.

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EXHIBIT A2

Clearance Study for WDZZ-FM Flint, Michigan
Using Proposed Site as Reference

REFERENCE									
43 02 29 N.					CLASS = A			DISPLAY DATES	
83 41 28 W.					Current Spacings			DATA 08-05-06	
----- Channel 224 - 92.7 MHz -----								SEARCH 08-08-06	
Call	Channel	Location			Azi	Dist	FCC	Margin	
Lat.	Lng.	Ant	Power		HAAT				

WDZZFM	LIC 224A	Flint			MI 178.2	2.84	115.0	-112.16	
	43 00 57	83 41 24	CN		3.000 kW	78 M			
	Cumulus Licensing LLC				BLH-19790919AG				
+ WJZL	LIC 224A	Charlotte			MI 244.2	100.83	115.0	-14.17	
	42 38 31	84 47 55	CN		1.500 kW	142 M			
	Rubber City Radio Group, Inc.				BMLH-19940610KA				
* WJSZ	LIC 223A	Ashley			MI 284.5	63.78	72.0	-8.22	
	43 10 56	84 27 03	CN		2.000 kW	122 M			
	KROL Communications Inc.				BLH-19940323KB				
* WBGV	LIC 223A	Marlette			MI 64.8	64.53	72.0	-7.47	
	43 17 10	82 58 17	C		3.000 kW	100 M			
	GB Broadcasting Company				BLH-19990621KC				
WDRQ	LIC-D 226B	Detroit			MI 147.6	74.99	69.0	5.99	
	42 28 16	83 12 03	DCN		26.500 kW	204 M			
	ABC Radio Detroit, LLC				BLH-19860613KB				
WJZL.C	CP 225A	Grand Ledge			MI 244.3	78.35	72.0	6.35	
	42 43 58	84 33 13	CX		4.600 kW	114 M			
	Rubber City Radio Group, Inc.				BPH-20051205ADE				
CJBXFM	OPE 224B	London			ON 92.0	213.16	190.0	23.16	
	42 56 40	81 04 48	HN		50.000 kW	121 M			
WIDL	LIC 221A	Caro			MI 29.9	56.45	31.0	25.45	
	43 28 51	83 20 31	CN		6.000 kW	97 M			
	Edwards Communications LC				BLH-19920410KA				
WMXD	LIC-Z 222B	Detroit			MI 146.0	94.94	69.0	25.94	
	42 19 55	83 02 42	ZCN		45.000 kW	146 M			
	AMFM Radio Licenses, L.L.C.				BLH-19970303KA				
AL221	RSV 221C3	Cass City			MI 33.5	79.84	42.0	37.84	
	43 38 20	83 08 38			25.000 kW	100 M			
					RM-10060				
WKQZ	LIC 227C2	Midland			MI 340.2	95.11	55.0	40.11	
	43 50 46	84 05 32	CN		39.000 kW	169 M			
	Citadel Broadcasting Company				BLH-19881027KB				

+ Note:	This shortage is an improvement of the waiver granted to WJZL (BMPH-790712AA). It is also based on the change in the Commission's rules for 6.0 kilowatt Class A facilities.								
* Note:	This shortage is based on a change in the Commission's rules for 6.0 kilowatt Class A facilities.								