

**MINOR CHANGE APPLICATION/  
CITY OF LICENSE CHANGE  
CUMULUS LICENSING LLC  
WWIZ (FM) RADIO STATION  
CH 280A - 103.9 MHZ - 6.0 KW  
WEST MIDDLESEX, PENNSYLVANIA  
January 2007**

**EXHIBIT A**

**City of License Change Review**

This application seeks to change the community of license of WWIZ, Channel 280A, from Mercer, Pennsylvania to West Middlesex, Pennsylvania, using the recently adopted city of license change procedures, as outlined in MB Docket 05-210, released November 29, 2006. Cumulus herein reviews the proposed change and shows why it is in compliance with the Commission's rules/procedures for a change. It is noted that WWIZ is a grandfathered Class A station operating with a nominal power of 6.0 kilowatts at 90.0 meters height above average terrain, authorized pursuant to §73.213(c). WWIZ increased power from 3.0 kilowatts to 6.0 kilowatts pursuant to §73.213(c)(2) of the rules.

**Background**

As indicated on Exhibit A1, Channel 280A, at the proposed implementation/allocation site at West Middlesex, Pennsylvania, meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207, with the exception of WRTS, Channel 279B, Erie, Pennsylvania and the occupied allotment of Channel 280C1 at Woodstock, Ontario, Canada (station CKDK).

Channel 280A commenced operation in Mercer, Pennsylvania prior to October 1, 1989, when Class A stations were limited to 3.0 kilowatts. Further, WWIZ was originally authorized prior to the change from miles to kilometers. The former spacing requirement for 3.0 kilowatt stations to first adjacent Class B stations was 65.0 miles. The present spacing between WWIZ and WRTS is 64.9 miles, which rounds to 65.0 miles. Therefore, the stations are adequately spaced. The change to kilometers made the distance between the stations 104.42 kilometers, where 105.0 kilometers is required. Thus the distance rounds down to 104.0 kilometers, but since the stations met the former distance separation requirements, it is believed that WWIZ is adequately spaced to WRTS under the former spacing requirements.

The allowable shortspace to Channel 280C1 at Woodstock, Ontario is based on the International Treaty between the governments of the United States and Canada. As depicted on Exhibit A2, a maximum 6.0 kilowatt Class A does not deliver interference to the maximum Channel 280C1 facility in Canada, based on the treaty's protected and interfering contours. Further, WWIZ does not receive interference from Channel 280C1 based on the domestic protected and interfering contours. As such, it is believed that this proposal complies with the International Agreement.

### **Discussion**

3.0 kilowatt grandfathered stations have previously be allowed to implement a change of community of license, provided the shortages to the other facilities were maintained or decreased. As the proposed change of community of license for WWIZ is specifying the station's existing site, there will be no change to the current shortages. As such, WWIZ is

compliant with the procedures for community of license change as outlined in Newnan and Peachtree City, and Freemont and Holton, Michigan<sup>2</sup>, wherein a grandfathered shortspaced station was authorized a community of license change. As such, Cumulus respectfully requests a waiver of §73.3573(g)(4) of the rules in keeping with the above cited rule making cases.

The proposed implementation/allotment site for West Middlesex, Pennsylvania is mutually exclusive with the licensed WWIZ facility at Mercer, Pennsylvania. WWIZ is not the only station presently licensed to Mercer, Pennsylvania, so the relocation will not remove the sole service from Mercer. Co-owned FM station WLLF, Channel 244A, will remain in Mercer. As a result of the proposed change, the community of West Middlesex, Pennsylvania will receive its first locally licensed/operational station, without depriving Mercer of its only local service. Exhibit A3 is the coverage map showing the 70 dBu contour from the proposed/authorized WWIZ site and shows the site provides a 70 dBu contour over all of the new community of license.<sup>3</sup> A 60 dBu contour is delivered to 348,678 persons in 2,348.8 square kilometers and a 70 dBu contour is delivered to 90,724 persons in 767.0 square kilometers. The proposed site is an existing tower and, therefore, is suitable for the proposed allotment of Channel 280A to West Middlesex, Pennsylvania.

Therefore, Cumulus proposes the following:

**West Middlesex, Pennsylvania**

Present	Proposed
None	280A

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2) MM Docket #98-180.

3) A reference 70 dBu contour, based on a Class A at 3.0 kilowatts at 91 meters HAAT (assuming uniform terrain) would also completely encompass West Middlesex, Pennsylvania.

### **Mercer, Pennsylvania**

Present  
244A, 280A

Proposed  
244A

As the implementation site for Channel 280A at West Middlesex, Pennsylvania is the same location as the authorized WWIZ site, there is no gain or loss of service as a result of the change of community. From the authorized site, a 60 dBu contour will be provided to 348,678 persons in 2,343.8 square kilometers.

West Middlesex, Pennsylvania, is not located in any Urbanized Area, as designated by the United States Census. The closest Urbanized Area is Youngstown, Ohio. From the proposed implementation site for WWIZ, a 70 dBu signal will cover only 11.0% of the area within the Youngstown, Ohio Urbanized Area. A map depicting the Urbanized Area is shown on Exhibit A4. Since the proposed new community of license is not located within the Urbanized Area, and West Middlesex, Pennsylvania is not located in the Urbanized Area, no Tuck analysis is needed. Attached as Exhibit A5 are the stations which provide service to West Middlesex, Pennsylvania.

Based on the foregoing, the proposed change of community of license complies with the Commission's technical rules and regulations.



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**EXHIBIT A1**

Allocation/Clearance Study for WWIZ West Middlesex, Pennsylvania  
Using Present WWIZ Site as Reference

REFERENCE					DISPLAY DATES				
41 12 16.0 N.			CLASS = A		Int = A		DATA 01-16-07		
80 21 49.0 W.			Current		Spacings		SEARCH 01-16-07		
----- Channel 280 - 103.9 MHz -----									
Call	Channel	Location		Azi	Dist	FCC	Margin		
	Lat.	Lng.	Ant	Power	HAAT				
-----									
WWIZ	LIC 280A	Mercer	PA	0.0	0.00	115.0	-115.00		
	41 12 16.0	80 21 49.0	CX	6.000 kW	90 M				
	Cumulus Licensing LLC		BLH-20050107ABR						
-----									
* AL6195	AL 280C1	Woodstock	ON	351.3	213.63	243.0	-29.37		
	43 06 18.0	80 45 50.0		100.000 kW	299 M				
	> Occupied by station CKDK - Operating with 52.0 kW @ 133 meters								
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+ WRTS	LIC 279B	Erie	PA	19.4	104.42	113.0	-8.58		
	42 05 25.0	79 56 37.0	CN	50.000 kW	152 M				
	Connoisseur Media Of Erie		BMLH-19871209KC						
-----									
WOGF	LIC-N 282B	East Liverpool	OH	184.0	68.71	69.0	-0.29		
	40 35 14.0	80 25 15.0	NCX	13.000 kW	219 M				
	Keymarket Licenses, LLC		BLH-20030324AAV						
-----									
WOGF	CP -Z 282B	East Liverpool	OH	184.0	68.71	69.0	-0.29		
	40 35 14.0	80 25 15.0	ZCX	23.500 kW	219 M				
	Keymarket Licenses, LLC		BPH-20030527AEG						
-----									
WQAL	LIC 281B	Cleveland	OH	278.0	116.32	113.0	3.32		
	41 20 28.0	81 44 24.0	CX	12.000 kW	293 M				
	CBS Radio Stations Inc.		BLH-20050901AAM						
-----									
RADD	ADD 282B	Moon Township	PA	182.9	76.59	69.0	7.59		
	40 30 56.0	80 24 34.0		50.000 kW	150 M				
	Keymarket Licenses LLC								
-----									
WNCD	LIC 227B	Youngstown	OH	240.1	27.58	15.0	12.58		
	41 04 50.0	80 38 54.0	CN	50.000 kW	85 M				
	Citicasters Licenses, L.P.		BLH-19831024AC						
-----									
WOGH	APP-Z 278B	Burgettstown	PA	173.6	86.69	69.0	17.69		
	40 25 43.0	80 14 55.0	ZCX	47.500 kW	135 M				
	Keymarket Licenses, LLC		BPH-20050628AAG						
-----									
WLMI	LIC 280A	Kane	PA	68.1	139.21	115.0	24.21		
	41 39 34.0	78 48 42.0	CN	3.000 kW	88 M				
	Colonial Radio Group, Inc.		BLH-19880504KA						
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\* Note: This is a pre-existing international shortage.

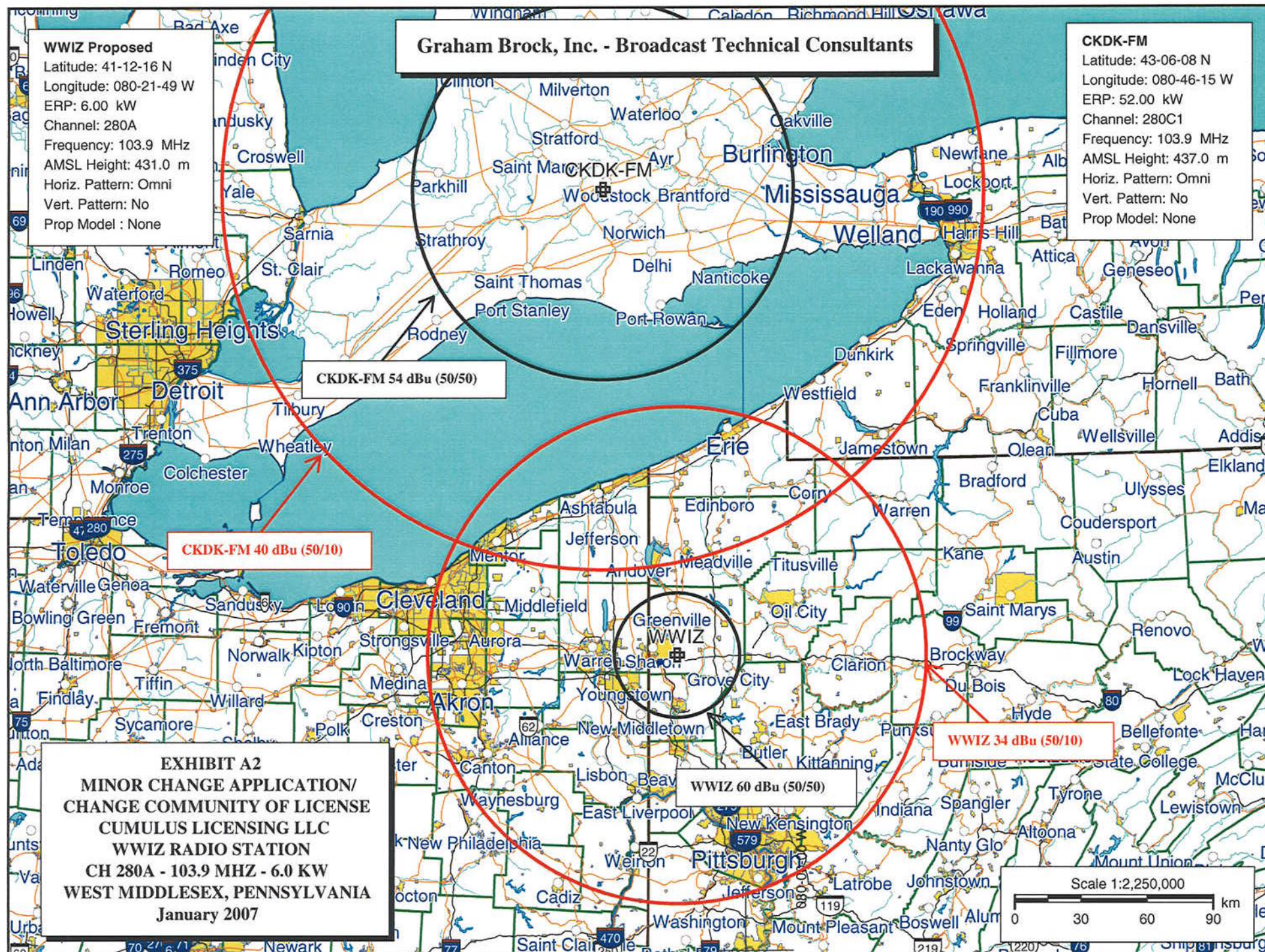
+ Note: This shortage was created by change of distances rules for 6.0 kW Class A.



**Graham Brock, Inc. - Broadcast Technical Consultants**

**WWIZ Proposed**  
Latitude: 41-12-16 N  
Longitude: 080-21-49 W  
ERP: 6.00 kW  
Channel: 280A  
Frequency: 103.9 MHz  
AMSL Height: 431.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model : None

**CKDK-FM**  
Latitude: 43-06-08 N  
Longitude: 080-46-15 W  
ERP: 52.00 kW  
Channel: 280C1  
Frequency: 103.9 MHz  
AMSL Height: 437.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

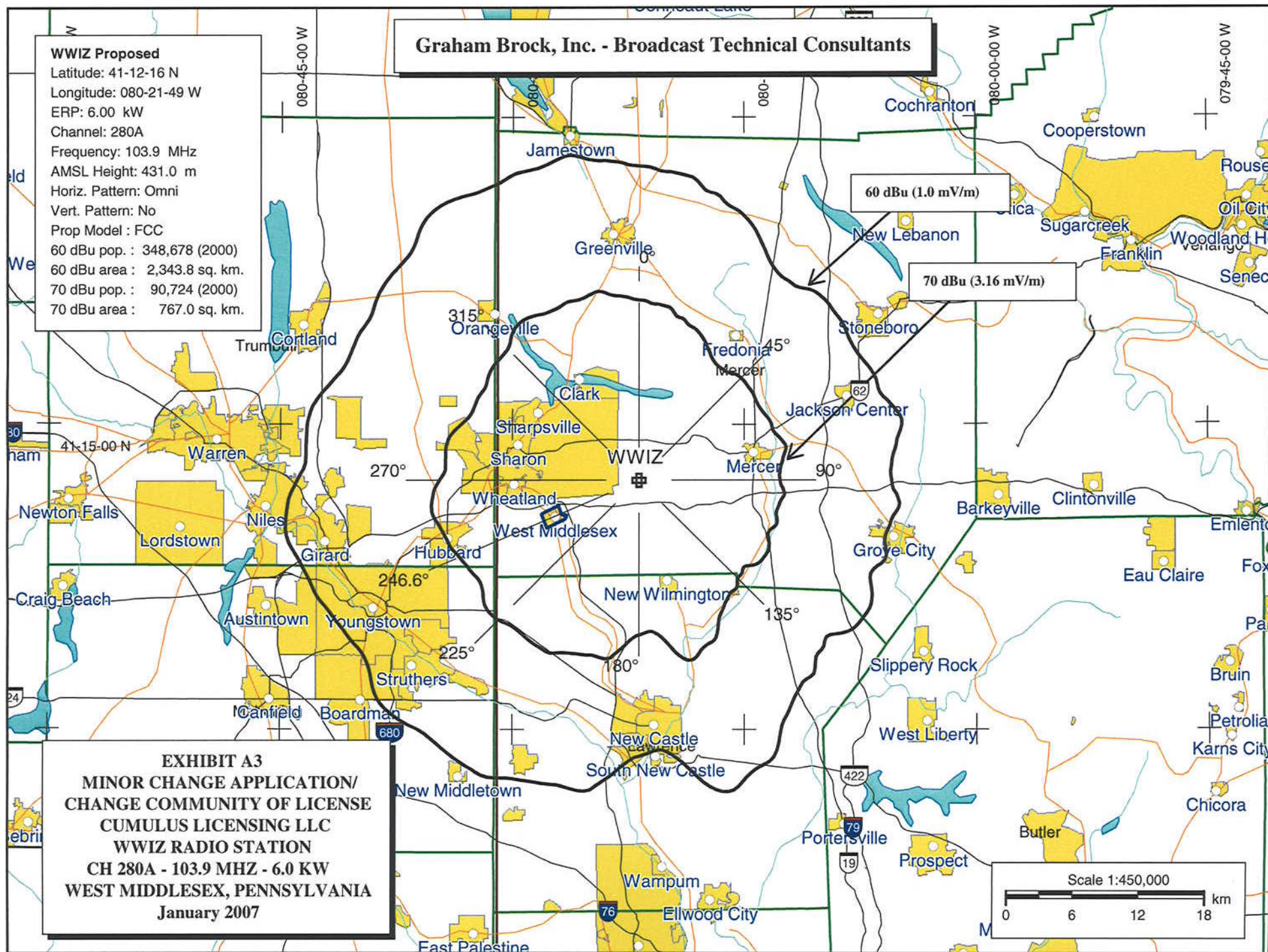




# Graham Brock, Inc. - Broadcast Technical Consultants

## WWIZ Proposed

Latitude: 41-12-16 N  
 Longitude: 080-21-49 W  
 ERP: 6.00 kW  
 Channel: 280A  
 Frequency: 103.9 MHz  
 AMSL Height: 431.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: FCC  
 60 dBu pop.: 348,678 (2000)  
 60 dBu area: 2,343.8 sq. km.  
 70 dBu pop.: 90,724 (2000)  
 70 dBu area: 767.0 sq. km.



**EXHIBIT A3**  
**MINOR CHANGE APPLICATION/**  
**CHANGE COMMUNITY OF LICENSE**  
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Longitude: 080-21-49 W  
ERP: 6.00 kW  
Channel: 280A  
Frequency: 103.9 MHz  
AMSL Height: 431.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model : FCC

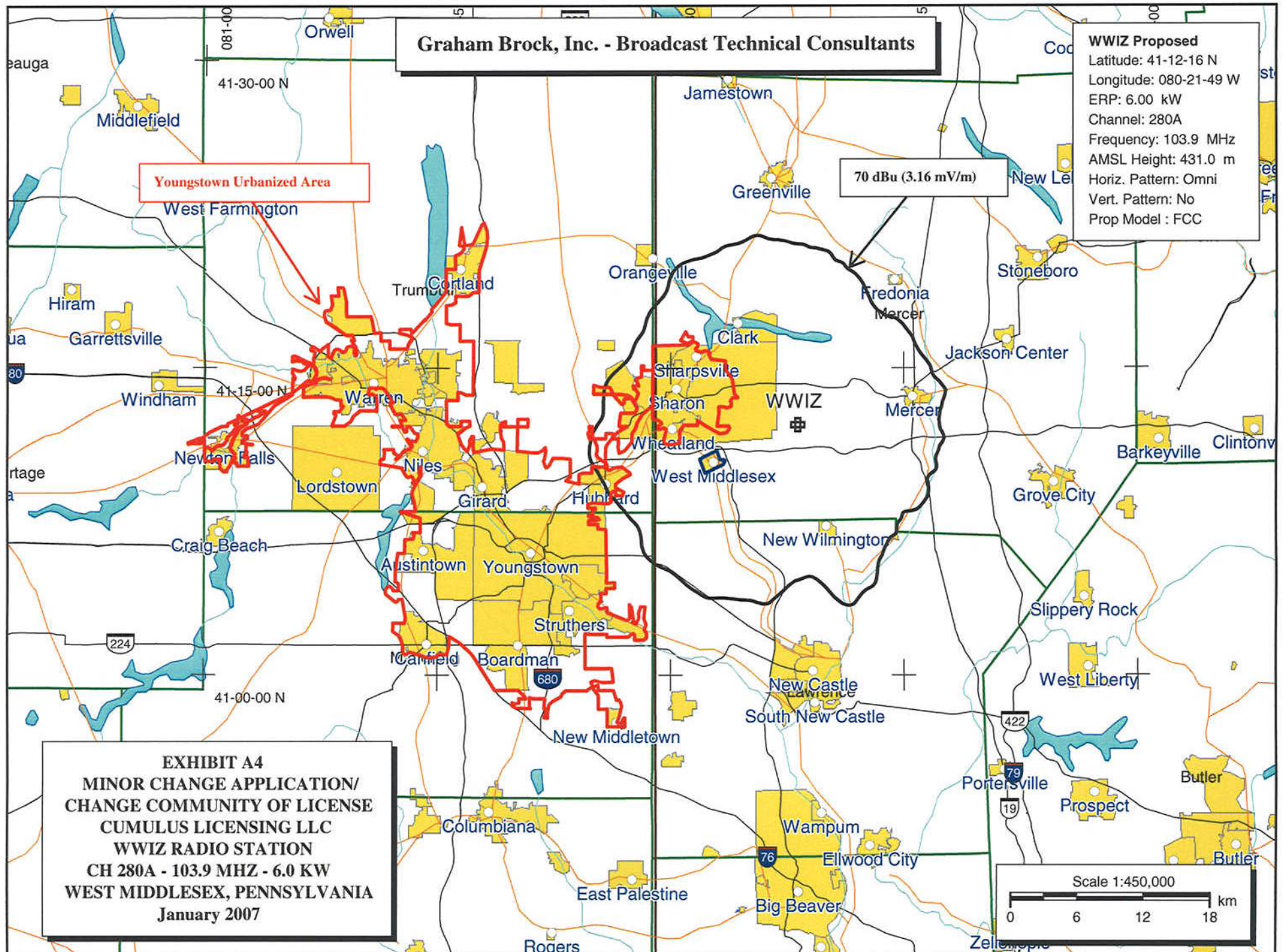
70 dBu (3.16 mV/m)

Youngstown Urbanized Area

**EXHIBIT A4**  
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Scale 1:450,000

0 6 12 18 km





**Graham Brock, Inc. - Broadcast Technical Consultants**

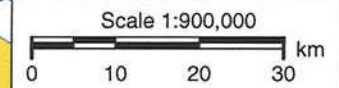
RED CONTOURS ARE AM 2.0 mV/m

BLACK CONTOURS ARE FM 60 dBu

WEST MIDDLESEX, PA

STATIONS PROVIDING SERVICE

**EXHIBIT #A5**  
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**Exhibit A5(1)**

**Stations Providing Protected Service to West Middlesex, Pennsylvania**

**FM Stations**

<b><u>Call</u></b>	<b><u>Channel</u></b>	<b><u>City, State</u></b>
WAKZ	240A	Sharpsville, Pennsylvania
WEXC	296A	Greenville, Pennsylvania
WHOT-FM	266B	Youngstown, Ohio
WKTL	214B1	Struthers, Ohio
WLLF	244A	Mercer, Pennsylvania
WMXY	255B	Youngstown, Ohio
WNCD	227B	Youngstown, Ohio
WQXK	211A	Salem, Ohio
WRBP	270A	Hubbard, Ohio
WWGY	236B	Grove City, Pennsylvania
WWNW	205A	New Wilmington, Pennsylvania
WYFM	275B	Sharon, Pennsylvania
WYSU	203B	Youngstown, Ohio
WYTN	219A	Youngstown, Ohio



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**Exhibit A5(1) (Continued)**

**Stations Providing Protected Service to West Middlesex, Pennsylvania**

**AM Stations**

<b><u>Call</u></b>	<b><u>Frequency</u></b>	<b><u>City, State</u></b>
KDKA	1020 kHz	Pittsburgh, Pennsylvania
WASN	1500 kHz	Youngstown, Ohio
WBBW	1240 kHz	Youngstown, Ohio
WGFT	1330 kHz	Campbell, Ohio
WGRP	940 kHz	Greenville, Pennsylvania
WHKZ	1440 kHz	Warren, Ohio
WHLO	640 kHz	Akron, Ohio
WJST	1280 kHz	New Castle, Pennsylvania
WKBN	570 kHz	Youngstown, Ohio
WKST	1200 kHz	New Castle, Pennsylvania
WKTZ	830 kHz	Cortland, Ohio
WLOA	1470 kHz	Farrell, Pennsylvania
WNIO	1390 kHz	Youngstown, Ohio
WPIC	790 kHz	Sharon, Pennsylvania
WSOM	600 kHz	Salem, Ohio
WTAM	1100 kHz	Cleveland, Ohio