

APPLICATION FOR STATION LICENSE
CUMULUS LICENSING LLC
KLYV RADIO STATION
CH 287C2 - 105.3 MHZ - 50.0 KW
DUBUQUE, IOWA
April 2008

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Cumulus Licensing LLC, (“Cumulus”), licensee of radio station KLYV, Channel 287C2, Dubuque, Iowa. Cumulus also holds a permit authorizing minor changes to KLYV (BPH-20041209ABL). This permit authorizes lowering of the center of radiation of the KLYV antenna system above ground and above mean sea level, with an increase in height above average terrain, based on the use of a computer terrain database. These changes were proposed to bring the licensed values into agreement with the actual location of the KLYV antenna. Further, co-owned station WJOD, Channel 277C3, Asbury, Iowa has an outstanding permit to relocate to the KLYV site and proposes to share an antenna with KLYV. It is noted that WJOD has not yet implemented its permit, which does not expire until June 13, 2008.

Since the KLYV permit will expire on April 6, 2008, this application for license is being submitted to cover the outstanding permit. The only change to the facilities proposed in BPH-20041209ABL is that KLYV will continue to operate with its licensed antenna system. The replacement antenna system will be installed when WJOD is relocated to the KLYV site, when the two stations will share the common antenna. At that time, Cumulus will submit a license modification for KLYV to note the replacement of the antenna system. Attached as Exhibit A is a calculation of the transmitter power output for the KLYV system.

There are six special operating conditions or restrictions noted on the KLYV permit. The first states that Cumulus will, in cooperation with other tower users, reduce the power of KLYV or cease operation, as necessary, to insure that persons having access to the tower will not be exposed to radio frequency electromagnetic fields in excess of the FCC's guidelines. Cumulus will comply with this requirement.

The second condition notes that an FCC/EPA Type 1 antenna was used to demonstrate compliance with the Commission's radio frequency radiation limits; an eight bay, 0.8 wavelength spaced system is noted. As indicated above, the proposed antenna change will only be implemented when WJOD is relocated to the KLYV site. Therefore, the licensed KLYV antenna, an RCA BFC-6C will remain on the tower. We have, therefore, prepared an updated radio frequency radiation study (Exhibit B) to show that KLYV remains in compliance with the FCC's limits. Since this does not actually reflect a change in the operating KLYV antenna system, it is believed that KLYV remains in compliance with the exposure rules.

Condition 3 states that sufficient spurious emission measurements must be taken to show compliance with §73.317 of the rules, with all users of the shared antenna simultaneously operating. As indicated above, WJOD has not been relocated to the KLYV site, and the KLYV antenna system has not been changed. As there are no other FM stations sharing the antenna system with KLYV, and KLYV continues to operate its licensed antenna system, no shared antenna measurements can be made. KLYV remains compliant with §73.317 of the rules; as such, it is believed that this condition is unnecessary.

Condition 4 states that the co-located AM station WDBQ shall determine its power by the indirect method while the KLYV antenna system is changed and that an application to return to direct measurement of power be submitted following the installation of the FM antenna. As indicated above, the KLYV antenna has not been replaced. KLYV continues to operate with its presently licensed antenna system. There was no change of antenna or line on the WDBQ tower. Therefore, it is believed that this condition is unnecessary, since WDBQ was not impacted in any way.

Condition 5 states that automatic program test authority for the permitted KLYV facilities do not apply and, further, that a request for program test for the facilities authorized in the KLYV permit must be submitted ten days in advance of the intended date of commencement. While program test authority has been requested in this filing, it is noted that KLYV continues to operate with its licensed facilities..

The final condition is a statement certifying that a fence has been installed at a minimum distance of 1.0 meter out from the base of the common KLYV/WDBQ tower. Cumulus herein states that a fence is installed a minimum of 3.0 meters out from the base of the tower, which is farther out than required by the condition. This fence prevents casual and inadvertent access to the base of the tower.

Based on the foregoing, it is believed that the applicable conditions have been satisfied and that KLYV is operating in accordance with Commission rules.