

TECHNICAL EXHIBIT
CHANGE OF PRINCIPAL COMMUNITY

WBBG (FM)

NILES, OHIO
GENEVA-ON-THE-LAKE, OHIO

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station WBBG (FM), Niles, Ohio, Facility ID No. 73309, in support of a minor change application to specify operations on channel 291A at Geneva-on-the-Lake, Ohio, in lieu of channel 291A at Niles, Ohio.

As the requested change is mutually exclusive with the Station's current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a)(i) and 73.3573(g).

The following is a summary of the merits of this proposal:

- The community of Geneva-on-the-Lake, Ohio (2000 Census population 1,545 persons) would be provided with its first local aural transmission service.
- The community of Niles, Ohio (2000 Census population 20,932 persons) would continue to have local aural transmission service from WRTK(AM) (Facility ID No. 73308).
- The proposed channel 291A allotment site at Geneva-on-the-Lake, Ohio satisfies the Commission's allocations spacing rules for a fully spaced, full 6 kilowatt ("kW") Class A facility.¹

¹ The proposed allotment reference coordinates are 41° 49' 51.9" North, 80° 53' 34.8" West. See this Exhibit under the heading "Compliance With FCC Rules" for details on allocations considerations with respect to

- The 60 dBu service area associated with the proposed operation of WBBG(FM) on channel 291A at Geneva-on-the-Lake, Ohio would encompass 112,479 persons, while the current 60 dBu service area encompasses 474,372 persons within the WBBG(FM) 60 dBu service contour.
- The channel 291A at Niles, Ohio 60 dBu loss area is well served by a number of radio services.²

Table of Figures Accompanying this Exhibit

Figure 1	WBBG(FM) Channel 291A Allocations Spacing Study at Allocations Site
Figure 2	WBBG(FM) 60 dBu Gain and Loss Areas
Figure 3	Tabulation of Services to WBBG(FM) 60 dBu Loss Area
Figure 4	Map of Services to WBBG(FM) 60 dBu Loss Area
Figure 5	WBBG(FM) Present and Proposed 70 dBu Service
Figure 6	Map of Protected Service to Proposed Community of License
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Figure 8	Map of WBBG(FM) Interfering Contour and CKLA(FM) Protected Contour

this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

² See Figures 3 and 4.

Proposed Change

Niles is located in Trumbull County, Ohio, and has a 2000 U.S. Census population of 20,932 persons. Niles would continue to be served by a local aural transmission service, specifically, AM station WRTK(AM) (Facility ID No. 73308).

Geneva-on-the-Lake is located in Ashtabula County, Ohio, and has a 2000 U.S. Census population of 1,545 persons. Geneva-on-the-Lake has no local FM or AM aural transmission service and, therefore, this proposal would bring a first local aural transmission service to Geneva-on-the-Lake.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 291A at Geneva-on-the-Lake, Ohio. The allotment reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments as a full 6 kW Class A allotment, except for WBBG(FM)'s existing channel 291A operation at Niles, Ohio, for which this proposal is a mutually exclusive substitute.

Operation from the channel 291A reference site would provide the requisite community grade (70 dBu) signal to all of Geneva-on-the-Lake.³ *Figure 5* is a map which depicts the community grade coverage (70 dBu) contour based on maximum class A facilities (ERP 6 kW/HAAT 100 meters) at the proposed allotment site. As shown, all (100%) of Geneva-on-the-Lake is located within the predicted 70 dBu community grade contour.

International Compliance Considerations

The proposed reference site is short to CKLA(FM) Guelph, Ontario, Canada under the standards set forth in the *1991 Working Agreement Between the Government of Canada and the Government of the United States of America* as

³ See Figure 5 herein.

amended in 1997. Prohibited contour overlap with station CKLA(FM) would not occur. Figure 8 is a map showing that the 34 dBu F(50:10) interfering contour of WBBG(GM) from the reference coordinates, with maximum class A facilities (ERP 6 kW/HAAT 100 meters), does not overlap the CKLA(FM) 54 dBu flat earth contour at maximum class B facilities.

Proposed 60 dbu Area

There would be 112,479 persons residing within the proposed WBBG(FM) 60 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within WBBG(FM)'s proposed 60 dBu contour would be 2,460 square kilometers.

Proposed 70 dbu Area

There would be 72,702 persons residing within the proposed WBBG(FM)'s 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within WBBG(FM)'s proposed 70 dBu contour would be 803 square kilometers.

60 dbu Gain and Loss Areas

There are currently 474,372 persons residing within the WBBG(FM) 60 dBu contour. There would be 112,479 persons residing within the proposed WBBG(FM) 60 dBu contour; 474,372 persons would lose service; and 112,479 persons would gain new 60 dBu service as a result of the proposed operation at Geneva-on-the-Lake. See *Figure 2*.

The 60 dBu loss area related to the modification of WBBG(FM) to Geneva-on-the-Lake is well served by many aural services. See *Figures 3 and 4*.

Urbanized Area Considerations

The proposed channel 291A 70 dBu contour would not encompass 50% or more of the population or area of any Urbanized Area.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions. The AM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.182.

Population and Area

The population within the FM service contour (1 mV/m or 60 dBu) was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Protected Service to Proposed Community of License

Geneva-on-the-Lake, Ohio, the proposed community of license, currently receives protected aural service from 10 radio stations, as shown in *Figures 6 and 7* (counting those stations which provide protected service to at least 80 percent of the area of the community of license).

Conclusion

WBBG(FM) can be modified from operation on channel 291A at Niles, Ohio, to operation on channel 291A at Geneva-on-the-Lake, Ohio, in compliance with all applicable Commission rules. The community of Geneva-on-the-Lake, Ohio would be provided with a first local aural transmission service, and the community of Niles, Ohio would continue to have a local aural transmission service. No service would be lost in any underserved area⁴ and no new underserved areas would be created as a result of this

⁴ Defined as an area receiving service from less than five aural broadcast services. In the case of this proposal, the 60 dBu loss areas will continue to receive 60 dBu service from multiple sources, local and distant. See *Figures 3 and 4*.

proposal. Therefore, the licensee requests the issuance of a construction permit for the minor modification of WBBG(FM) to specify operations on channel 291A at Geneva-on-the-Lake, Ohio.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor
May 11, 2007

Figure 1

Spacing Study at Allocation Site

ComStudy 2.2 search of channel 291 (106.1 MHz Class A) at 41-49-51.9 N, 80-53-34.8 W.

Callsign	State	City	Freq	Chanl	ERP_w	Class	Status	Dist_km	Sep	Clr
WBBG	OH	NILES	106.1	291	3000	A	LIC	63.91	115.00	-51.1
CKLAFM	ON	GUELPH	106.1	291	50000	B		191.34	206	-14.7
WGOJ	OH	CONNEAUT	105.5	288	6000	A	LIC	31.42	31	0.4
WGOJ	OH	CONNEAUT	105.5	288	0	A	USE	31.42	31	0.4
WVNO-FM	OH	MANSFIELD	106.1	291	40000	B	LIC	186.86	178	8.9
WVNO-FM	OH	MANSFIELD	106.1	291	0	B	USE	187.04	178	9
NEW	PA	FARMINGTON TOWNSHIP	106.1	291	4120	A	CP	127.3	115	12.3
WMJI	OH	CLEVELAND	105.7	289	0	B	USE	82.8	69	13.8
WMJI	OH	CLEVELAND	105.7	289	16000	B	LIC	83.32	69	14.3
WCTL	PA	UNION CITY	106.3	292	3400	A	LIC	86.47	72	14.5
WCTL	PA	UNION CITY	106.3	292	0	A	USE	86.91	72	14.9
790904AI	OH	CLEVELAND	106.5	293	0	B	USE	85.28	69	16.3
WMVX	OH	CLEVELAND	106.5	293	11500	B	LIC	85.28	69	16.3

Figure 2
60 dBu Gain Loss Areas

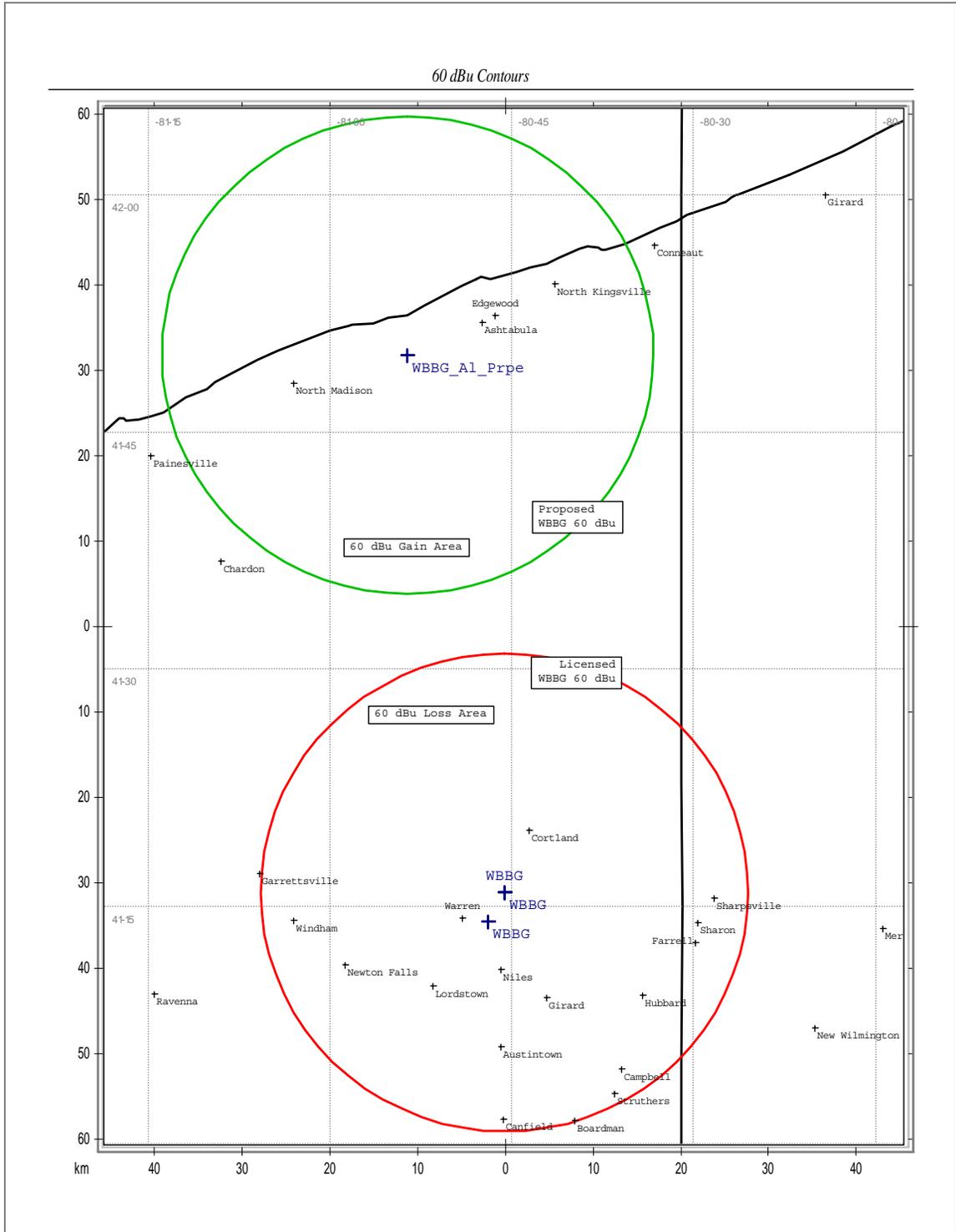


Figure 3
Tabulation of Services to Loss Area

Call Sign	Facility_id	City	State
WAKS	49952	AKRON	OH
WAKZ	74468	SHARPSVILLE	PA
WANR	70531	WARREN	OH
WASN	72100	YOUNGSTOWN	OH
WBBW	13667	YOUNGSTOWN	OH
WCRF-FM	66101	CLEVELAND	OH
WCVJ	612	JEFFERSON	OH
WENZ	2685	CLEVELAND	OH
WEXC	25225	GREENVILLE	PA
WFHM-FM	54778	CLEVELAND	OH
WGFT	74164	CAMPBELL	OH
WGRP	25227	GREENVILLE	PA
WGYY	24940	MEADVILLE	PA
WHBC-FM	4488	CANTON	OH
WHKZ	57235	WARREN	OH
WHLO	43858	AKRON	OH
WHOT-FM	13670	YOUNGSTOWN	OH
WJST	24997	NEW CASTLE	PA
WKBN	70519	YOUNGSTOWN	OH
WKDD	43863	MUNROE FALLS	OH
WKST	71246	NEW CASTLE	PA
WKSU-FM	34045	KENT	OH
WKSV	34040	THOMPSON	OH
WKTL	4267	STRUTHERS	OH
WKTZ	42365	CORTLAND	OH
WLLF	6653	MERCER	PA
WLOA	47569	FARRELL	PA
WMJI	73268	CLEVELAND	OH
WMMS	73273	CLEVELAND	OH
WMXY	73154	YOUNGSTOWN	OH
WNCD	13668	YOUNGSTOWN	OH
WNIO	13669	YOUNGSTOWN	OH
WNIR	41077	KENT	OH
WONE-FM	43873	AKRON	OH
WPIC	60005	SHARON	PA
WQMX	43872	MEDINA	OH
WQXK	37548	SALEM	OH
WRBP	63498	HUBBARD	OH
WREO-FM	54566	ASHTABULA	OH
WRTK	73308	NILES	OH
WSOM	37547	SALEM	OH
WTAM	59595	CLEVELAND	OH
WTGP	66779	GREENVILLE	PA
WVMN	43698	NEW CASTLE	PA
WWGY	74469	GROVE CITY	PA

Call Sign	Facility_id	City	State
WWIZ	23437	MERCER	PA
WWNW	72031	NEW WILMINGTON	PA
WYFM	60006	SHARON	PA
WYSU	74434	YOUNGSTOWN	OH
WYTN	20940	YOUNGSTOWN	OH
WZAK	74465	CLEVELAND	OH
WZKL	14914	ALLIANCE	OH

Figure 5
Present and Proposed 70 dBu Service

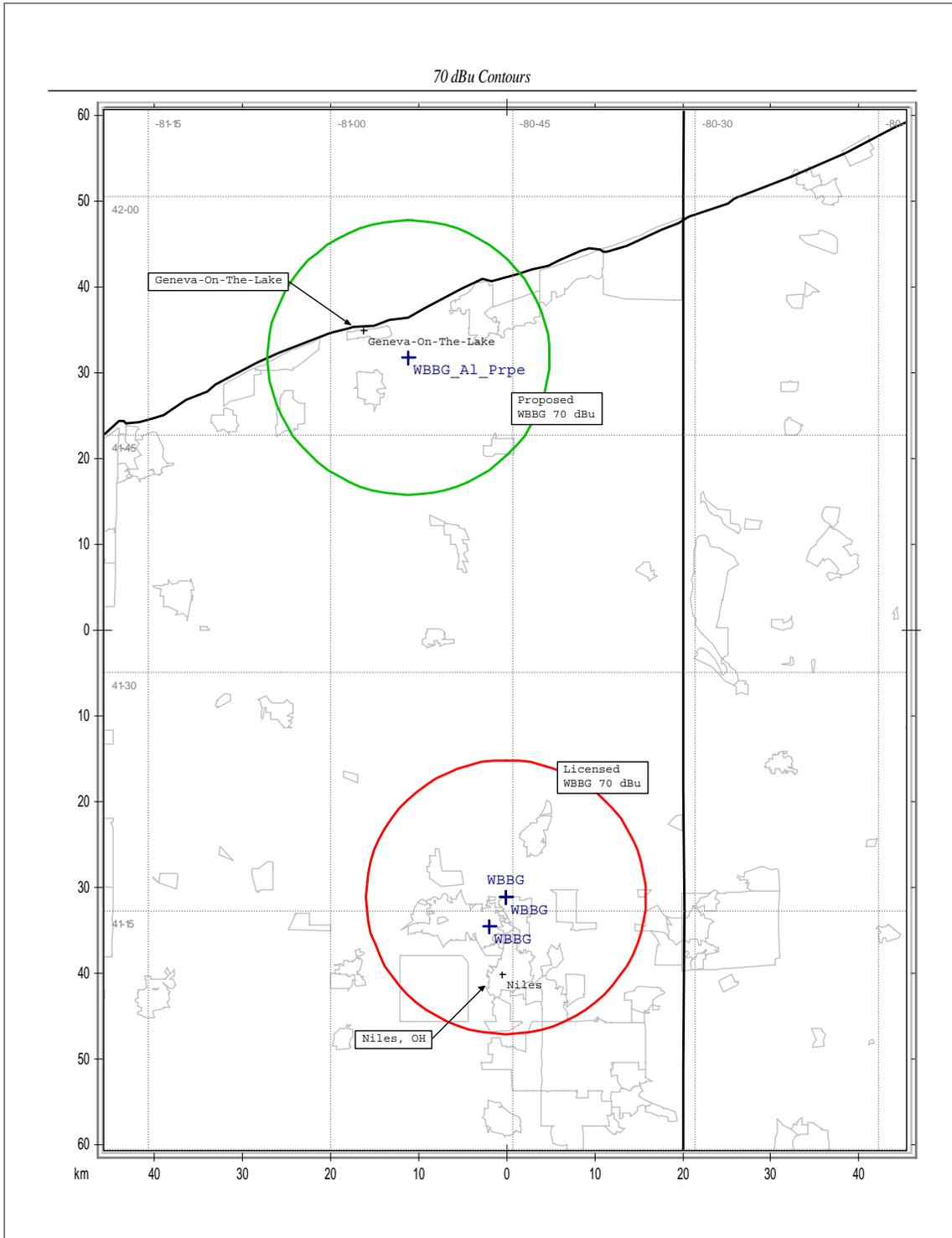


Figure 6

Map of Protected Service to Proposed Community of License

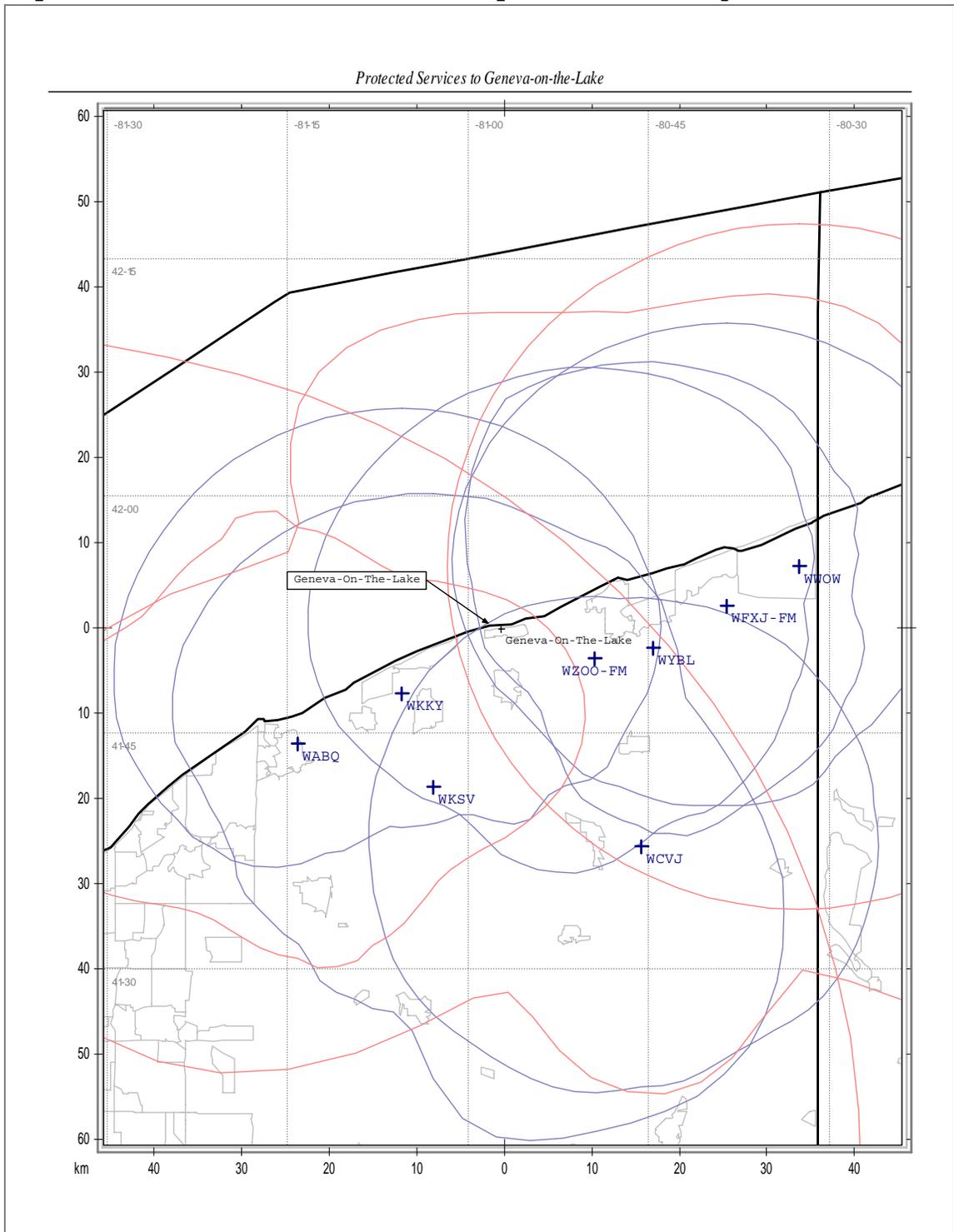


Figure 7

Table of Protected Service to Proposed Community of License

Call Sign	Facility_id	City	State
WKSV	34040	THOMPSON	OH
WKKY	47103	GENEVA	OH
WZOO-FM	7819	EDGEWOOD	OH
WCVJ	612	JEFFERSON	OH
WYBL	87818	ASHTABULA	OH
WFXJ-FM	76320	NORTH KINGSVILLE	OH
WABQ	13685	PAINESVILLE	OH
WTAM	59595	CLEVELAND	OH
WWOW	13724	CONNEAUT	OH
WFUN	54565	ASHTABULA	OH

Figure 8

Map of Interfering Contour and CKLA(FM) Protected Contour