

DISPLACEMENT/MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
W241AE FM TRANSLATOR STATION
CH 270D - 101.9 MHZ - 0.250 KW
CONWAY, SOUTH CAROLINA
November 2009

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of FM translator station W241AE, Channel 241D, Conway, South Carolina. Cumulus herein proposes to make changes to the licensed W241AE by changing channels, increasing effective radiated power, correcting the geographic coordinates of the site,¹ and correcting the center of radiation above ground/mean sea level. The proposed change of channel from Channel 241D to Channel 270D is requested based on the displacement of FM translator W241AE from Channel 241D by station WKZQ-FM, which changed from Channel 269C2 at Myrtle Beach, South Carolina to Channel 241C2 at Forestbrook, South Carolina.² Since the proposed channel change for W241AE is greater than the adjacent channels, a waiver of §74.1233(a)(1) of the rules is respectfully requested. The translator will continue to be used as a fill-in for co-owned station WJXY-FM, Conway, South Carolina. See Exhibit A for a map.³

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- 1) The original W241AE application for permit was submitted prior to the requirement for tower registration. In the process of preparing this instant application, it was discovered that the coordinates of the tower were updated during the tower registration process. The correction is for two seconds in latitude and two seconds in longitude.
 - 2) WKZQ-FM's changes were part of a three station contingent filing.
 - 3) As the proposed W241AE facility is located at the same site as the licensed facility, there is a common area of overlap between the 60 dBu contours.

As a result of the operation of WKZQ-FM on a co-channel with FM translator W241AE, a review of the adjacent channels was undertaken (three above, three below, and the two intermediate frequency (IF) channels). The operation of W241AE⁴ at the corrected height and coordinates on the adjacent channels would cause prohibited interference to one or more authorized or proposed facilities, with the exception of Channel 243. The individual channel studies are attached as Exhibits B1 through B9.⁵ In the case of Channel 243, the closest potential station that would receive interference is WFLB, Channel 243C, Laurinburg, North Carolina. While there is no theoretical contour overlap between W241AE and WFLB (a buffer of 6.6 kilometers exists between the W241AE interfering contour and the WFLB protected contour, as shown on Exhibit B10), there is a level of signal being received beyond the 60 dBu; therefore, the potential for interference to WFLB from operation of W241AE on Channel 243 is significant.⁶ WFLB likely has listeners within the translator's 60 dBu contour; therefore, actual interference could result. Based on the foregoing, it is respectfully requested that W241AE be allowed to move to Channel 270 and that a waiver of §74.1233(a)(1) of the rules be allowed.

As Cumulus is proposing to locate the W241AE antenna system on an existing tower, the Federal Aviation Administration was not apprised of this proposal. The tower has been registered with the Commission and has been assigned Antenna Structure Registration Number

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- 4) At the licensed power of 0.019 kilowatt.
 - 5) The stations shown in italics are the ones that are primarily impacted by the operation of FM translator W241AE on the respective channel.
 - 6) Graham Brock, Inc., is also the Technical Consultant to WFLB License Limited Partnership, licensee of WFLB, Laurinburg, North Carolina.

1200226. Attached as Exhibit C is a study demonstrating that the proposed W241AE translator 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 facility.

As the W241AE site is shared with a co-located AM station, a study has been undertaken to show the proposed W241AE facility is in compliance with the Commission's radio frequency emission limits (see Exhibit D). It is noted that Cumulus intends to use the antenna system and transmission line already installed on the tower to implement this frequency change. As there will be no change on the tower, the co-located AM, WPJS, will not be impacted by this change. WPJS uses a three wire, folded unipole feed system (no base insulated tower). Since nothing on the tower will be changed, it is respectfully requested that no AM condition be placed on the herein requested permit.

All other necessary documentation used to certify the technical portion of FCC Form 349 has been forwarded to Cumulus and is available to the Commission upon request.⁷

7) The undersigned has only reviewed the radiofrequency limit portion of the environmental analysis. All data regarding stations was extracted from the Commissions CBDS database. We assume no liability for errors or omissions in that database.