

**MINOR CHANGE APPLICATION**  
**UNITY BROADCASTING, INC.**  
**WLCS RADIO STATION**  
**CH 252A - 98.3 MHZ - 1.6 KW**  
**NORTH MUSKEGON, MICHIGAN**  
**September 2002**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Unity Broadcasting, Inc. ("UBI"), proposed licensee of WLCS, Channel 252A, North Muskegon, Michigan. UBI is proposing to make minor changes in the facilities of WLCS by relocating the station, increasing tower height above mean sea level and height above average terrain and lowering the effective radiated power to remain a maximum 3.0 kilowatt/100 meter Class A facility.<sup>1</sup>

UBI is proposing to locate the antenna system for WLCS on a new (to be constructed) tower at which station WSHN-FM, Holton, Michigan, is authorized. As such, the Federal Aviation Administration was not appraised of this proposal, as it has already issued a Determination of No Hazard for the tower. The tower has been registered with the Commission and assigned tower registration #1231051.

At the site proposed in this application, Channel 252A does not meet the Commission's minimum distance separation requirements to one other FM facility. The shortage was created

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1) A principal of UBI has attributable interests in Noordyk Broadcasting, Inc., licensee of WSHN, Fremont, Michigan, and WSHN-FM, Holton, Michigan; permittee of a new FM station on Channel 223A at Newaygo, Michigan, and the proposed assignee of stations WUBR and WEFM-FM Whitehall, Michigan. Because of the filing of this instant application and a minor change application to relocate the outstanding permit at Newaygo, the radio markets involving these stations will be slightly changed. As such, an upgraded Radio Ownership study is being submitted.

when the spacing requirements for Class A stations were changed, as noted in MM Docket #88-375. Exhibit A is a demonstration that this proposal complies with §73.213 (c)(1) of the rules and a discussion on the shortages. All other necessary documentation used to certify the technical portion of FCC Form 301 have been forwarded to the applicant and is available to the Commission upon request.