

TECHNICAL EXHIBIT

CHANGE OF COMMUNITY OF LICENSE TO DANNEMORA, NY

Technical Narrative

This technical narrative and accompanying Figures have been prepared by Radioactive, LLC, holder pursuant to issuance at Auction No. 37 of the construction permit for an unbuilt FM station on channel 296C3, Saranac Lake, NY, File No. BNPH-20050103AHN, Facility ID No. 164251, the "Permit"), in support of an application for the minor modification of the Permit to specify operation on channel 296A at Dannemora, NY. This contingent application is being filed along with the concurrently-filed application for a construction permit for the minor modification of Radioactive's permit for a new FM station on channel 250C2, Dannemora, File No. BNPH-20050103AEC, Facility ID No. 164249, which minor modification application specifies operation on channel 250C2A at Keeseville, NY.¹

As the requested change is mutually exclusive with the Permit'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 modification:

- The community of Dannemora, NY (2000 Census population 4,129 persons) will have a second local aural transmission service, as contemplated by the Commission by its allocation of channel 250C2 to Dannemora.
- The community of Saranac Lake, NY (2000 Census population 5041 persons) will not lose service, as the Permit has not yet been constructed, and there are three currently operating services, and one unbuilt CP (unrelated to the Permit here). Saranac Lake will

¹ These contingent applications meet the requirements of 47 C.F.R. Sections 73.3517(e). Note that there is no written agreement for the coordinated facility modifications because the permits are held by the same entity.

continue to have one local aural service per 1260 persons.

- The proposed channel 296A allotment site at Dannemora, NY, satisfies the Commission's allocations spacing rules for a fully spaced, full 6 (kW) Class A facility with respect to all US allocations.²
- The 60 dBu area associated with the proposed operation on channel 296A at Dannemora, NY would encompass 73,193 persons, in an area of 2,459 sq. km.
- The 70 dBu are associated with the proposed operation on channel 296A at Dannemora, NY will encompass 24,136 persons, in an area of 803 sq. km.

Proposed Change to the Permit

The present community of license for the Permit is Saranac Lake, New York, which has a 2000 U.S. Census population of 5041 persons. Because the Permit is unbuilt, changing the Permit's community of license would not constitute the removal of service from Saranac Lake. Moreover, Saranac Lake has existing local aural transmission service from licensed stations WNBZ(AM), WSLI(FM), WYZY(FM) and a CP for WSLP(FM). The Permit's 60 dBu area is well served by many aural services. See *Figures 3 and 4*.

The proposed community of license for the Permit is Dannemora, which is located in Clinton County, New York, and has a 2000 U.S. Census population of 4129 persons. Dannemora has one FM station, WKVJ(FM) and a CP which, in a concurrently filed contingent application is proposed to be reallocated to Keeseville, NY. The proposed application would maintain the current level of two allocations to Dannemora, NY.

² The proposed allotment reference coordinates are 44° 47' 06" North, 73° 39' 01" West. See this Exhibit under the heading "Compliance with FCC Rules" for details on allocations considerations with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 296A at Dannemora, New York. 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 domestic stations and allotments as a full 6 kW Class A allotment, except for the Permit's existing channel 296C3 allotment at Saranac Lake, NY, for which this proposal is a mutually exclusive substitute.

Operation from the channel 269A reference site with a directional pattern required to protect CITE in Montreal, QE, Canada would provide the requisite city grade (70 dBu) signal to Dannemora. *Figure 2* is a map which depicts the city grade coverage (70 dBu) contour based on maximum Class A facilities (ERP 6 kW/HAAT 100 meters) at the proposed allotment reference site. As shown, all (100%) of Dannemora, NY is located within the predicted 70 dBu contour.

International Compliance Considerations

The proposed transmitter site is short to CITE (FM), Montreal, QE, 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 amended in 1997 (Agreement). Radioactive proposes that its application be granted with the condition that radiation be limited toward Canada so that prohibited contour overlap with CITE (FM) is prevented. *Figure 7* is a map showing that the 48dBu F(50,10) interfering contour does not overlap the CITE (FM) 54 dBu flat earth contour at maximum class C1 facilities. *Figure 7* also shows that the required 6db protection to the flat earth maximum facility contours of the Canadian allocation of CITE (FM) is met over all land areas in Canada.

Urbanized Area Considerations

The Permit's present and proposed 70 dBu contours do not encompass any Urbanized Area.

Proposed 60 dbu Area

There would be 73,193 persons residing within the Permit's 60 dBu contour as calculated from the proposed site and based on maximum Class C1 facilities; the area within the Permit's proposed 60 dBu contour would be 2,459 square kilometers.

Proposed 70 dbu Area

The 70 dBu are associated with the proposed operation on channel 296A at Dannemora, will encompass 24,136 persons, in an area of 803 sq. kilometers.

Protected Service to Proposed Community of License

Dannemora, NY , the proposed community of license, currently receives protected aural service from 14 radio stations, as shown in *Figures 5 and 6* (counting those stations which provide protected service to at least 80 percent of the area of the community of license).

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 populations within the service contours were 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.

Conclusion

The class and community of license of the Permit may be changed to channel 296A at Dannemora, NY, in compliance with all applicable Commission rules. The community of Dannemora, NY would maintain its second local aural transmission service, and given that the Permit is unbuilt, the community of Saranac Lake, NY will not lose an existing aural service. Moreover, the area within the Permit's 60 dBu contour is already well served by existing aural services, and Saranac Lake would continue to be served by the licensed facilities of WNBZ, WSSL, and WYSY and will still have a CP for WSLP. Therefore, the applicant requests the minor modification of the Permit specifying operations on channel 296A at Saranac Lake, New York.

Figure 1

Spacing Study at Allotment Reference Site

ComStudy 2.2 search of channel 269A at 44-47-06 N, 73-39-01 W.

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_k	Sep	Clr
CITEFM	QC	MONTREA	107.3	297	43000	C1		80.21	164	-83.8
CKQB	ON	OTTAWA	106.9	295	100000	C1		190.57	164	26.6
NEW	NY	SARANAC	107.1	296	0	C3	USE	55.49	142	-86.5
NEW	NY	SARANAC	107.1	296	11000	C3	CP	60.81	142	-81.2
WIZN	VT	VERGENN	106.7	294	0	C2	USE	61.82	55	6.8
WIZN	VT	VERGENN	106.7	294	1000	C2	LIC	61.83	55	6.8
WIZN	VT	VERGENN	106.7	294	50000	C2	LIC	61.83	55	6.8
WORK	VT	BARRE	107.1	296	0	A	USE	116.31	115	1.3
WORK	VT	BARRE	107.1	296	3900	A	LIC	116.31	115	1.3
WVNV	NY	MALONE	96.5	243	0	C3	USE	39.03	12	27
WVNV	NY	MALONE	96.5	243	16000	C3	LIC	45.03	12	33

Figure 2

Proposed 70 dBu Contour Service from Allotment Reference Site

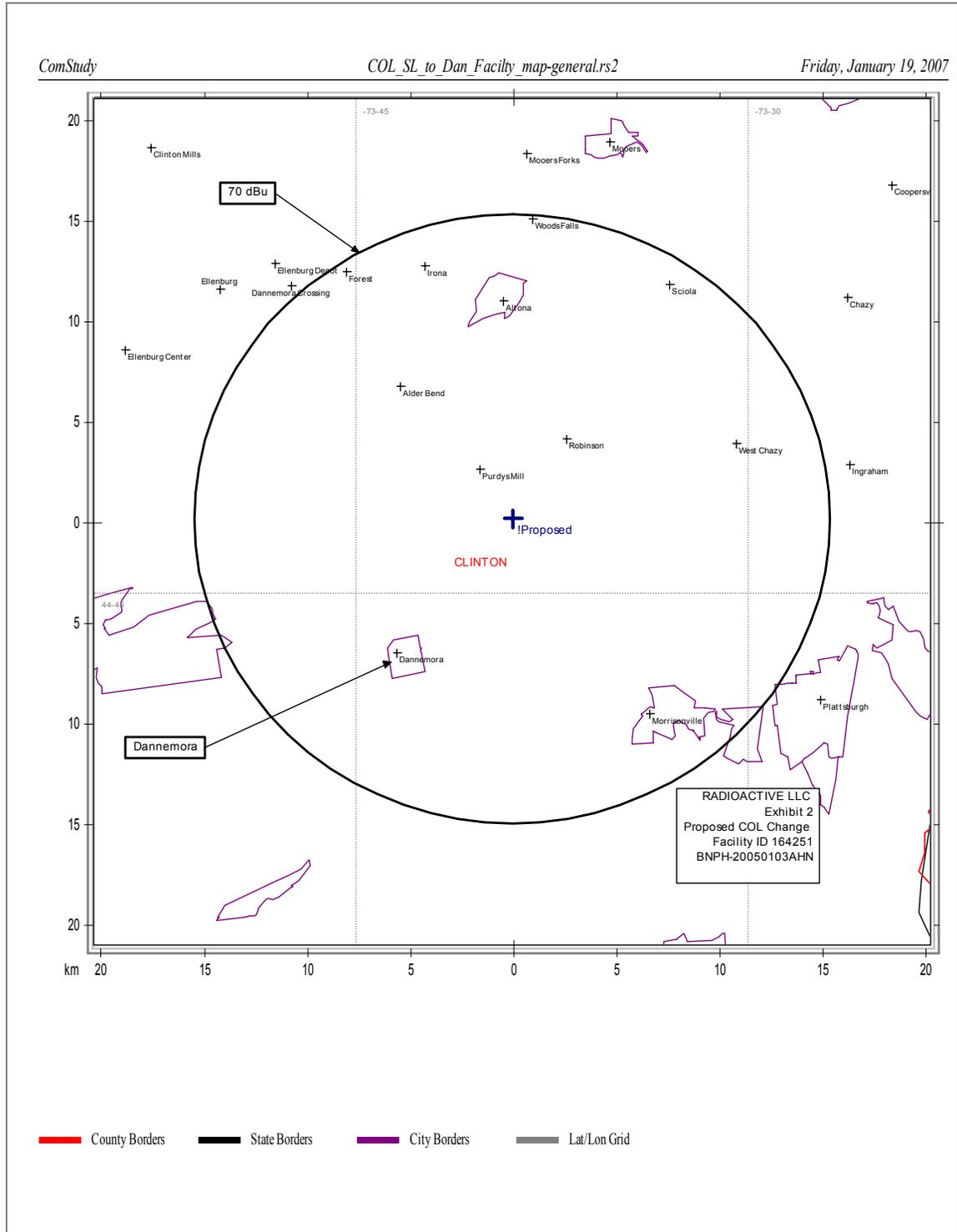


Figure 4

*Tabulation of Existing Aural Services to Permit's 60 dBu
Contour Area as Presently Authorized*

Call Sign	City	State
WXLH	BLUE MOUNTAIN LAKE	NY
WYUL	CHATEAUGAY	NY
WYZY	SARANAC LAKE	NY
WLPW	LAKE PLACID	NY
WRGR	TUPPER LAKE	NY
WSLL	SARANAC LAKE	NY
WRCD	CANTON	NY
WMHQ	MALONE	NY
WVNV	MALONE	NY
WBTZ	PLATTSBURGH	NY
WAVX	SCHUYLER FALLS	NY
WXLU	PERU	NY
WXZO	WILLSBORO	NY
WUSX	ADDISON	VT
WCPV	ESSEX	NY
WKVJ	DANNEMORA	NY
WCLX	WESTPORT	NY
WKOL	PLATTSBURGH	NY
WIRD	LAKE PLACID	NY
WNBZ	SARANAC LAKE	NY
WTWK	PLATTSBURGH	NY
WICY	MALONE	NY
WVMT	BURLINGTON	VT
WEAV	PLATTSBURGH	NY
WCHP	CHAMPLAIN	NY
WIRY	PLATTSBURGH	NY

Figure 5

Map of Protected Service to Proposed Community of License

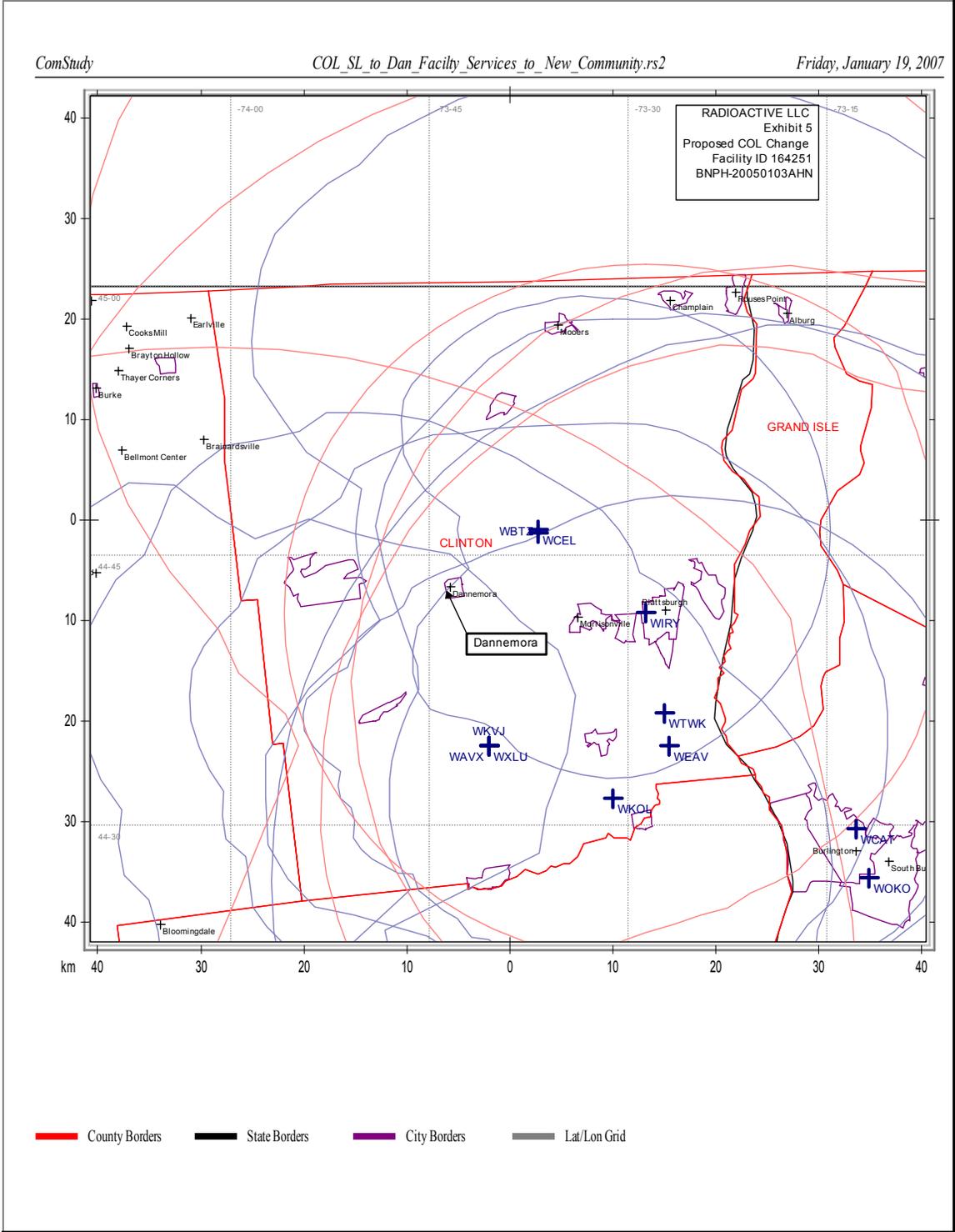


Figure 6

Tabulation of Protected Service to Proposed Community of License

Call Sign	City	State
WYZY	SARANAC LAKE	NY
WOKO	BURLINGTON	VT
WBTZ	PLATTSBURGH	NY
WAVX	SCHUYLER FALLS	NY
WXLJ	PERU	NY
WKVJ	DANNEMORA	NY
WCEL	PLATTSBURGH	NY
WKOL	PLATTSBURGH	NY
WIRD	LAKE PLACID	NY
WCAT	BURLINGTON	VT
WEAV	PLATTSBURGH	NY
WTWK	PLATTSBURGH	NY
WIRY	PLATTSBURGH	NY
WDEV	WATERBURY	VT

Figure 7

International Compliance

