

**MINOR CHANGE APPLICATION**  
**CITY OF LICENSE CHANGE**  
**STARSTATION RADIO, LLC.**  
**WLRR FM RADIO STATION**  
**CH 264A - 100.7 MHZ - 2.5 KW**  
**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A**

**City of License Change Review**

This application seeks to change the community of license of the licensed WLRR, Channel 264A, from Milledgeville, Georgia to Buckhead, Georgia using the city of license change procedures, as outlined in MB Docket 05-210, released November 29, 2006. WLRR will become Buckhead's first commercial service. Starstation herein reviews the proposed change and demonstrates compliance with the Commission's rules/procedures for a change.

As indicated on Exhibit A1, at the proposed site for WLRR at Buckhead, Georgia, Channel 264A meets the Commission's minimum distance separation requirements to all other licensed, applied for, or proposed facilities pursuant to §73.207, with the exception of the current WLRR facility and secondary service LPFM facility WPPP-LP. It is noted that Channel 229 (93.7 MHz) is a fully spaced alternative frequency for WPPP-LP, as noted in Exhibit A2.

Exhibit A3 is the a map demonstrating that the proposed 70 dBu contour fully serves the city of Buckhead. This is an existing tower site, and it is acceptable for use by WLRR as a viable location for a radio tower.

Therefore, Starstation proposes the following:

**Milledgeville, Georgia**

**Present**

WMVG (AM) - 1450 kHz  
WRGC-FM - Channel 202C3  
WGUR - Channel 237D  
WLRR - Channel 264A  
WKZR - Channel 272A

**Proposed**

WMVG (AM) - 1450 kHz  
WRGC-FM - Channel 202C3  
WGUR - Channel 237D  
WKZR - Channel 272A

**Buckhead, Georgia**

**Present**

WPMA - Channel 204C3

**Proposed**

WPMA - Channel 204C3  
WLRR - Channel 264A

Exhibit A4 shows the areas of signal loss and signal gain as a result of the move.

Milledgeville has a population 19,401 persons, and Buckhead has a population of 171 persons.

There is an area of overlap between the 60 dBu contour of the licensed WLRR at Milledgeville and the proposed site for Channel 264A at Buckhead. The licensed WLRR at Milledgeville provides 60 dBu service to 60,833 persons over 1,925 square kilometers. The proposed WLRR at Buckhead will provide a 60 dBu contour to 45,029 persons over 2,581 square kilometers. The resultant move will create a loss of service to 57,500 persons and a gain of service to 41,715 persons, with a common area of service to 3,336 persons, within the 60 dBu service contours. Exhibit A4 depicts the gain, loss, and common service areas.

Exhibit A5 shows the protected service contours of existing audio facilities providing service to the loss area. It is noted that WLRR at Milledgeville provides a fourth service to 24 persons over 14.19 square kilometers and fifth service to 421 persons over 67.52 square

kilometers, as presently licensed. The tabulation of loss area services is included as Exhibit A6. Exhibit A7 shows the protected service contours of existing audio facilities providing service to the gain area. It is noted that WLRR at Buckhead will provide a fifth service to 40 persons over 21.80 square kilometers as proposed. The tabulation of gain area services is included as Exhibit A8. As there are no white or gray areas with less than three services in either the loss or gain areas, they are considered well served.

Exhibit A9 is a map depicting the existing stations providing primary service to the community of Milledgeville, Georgia. Attached as Exhibit A10 is a tabulation of those stations. Exhibit A11 is a map depicting the existing stations providing primary service to the community of Buckhead, Georgia. Attached as Exhibit A12 is a tabulation of those stations.<sup>1</sup>

Buckhead, Georgia is not located within or immediately adjacent to an Urbanized Area, as designated by the United States Census. Based on the foregoing, the proposed change of community of license for WLRR complies with the Commission's technical rules and guidelines.

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1) The signal threshold for primary service to the community of Buckhead is 60 dBu for FM stations and 2.0 mV/m for AM stations.

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**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A1**

Allocation/Clearance Study for WLRR Buckhead, Georgia  
Using Proposed Allocation / Implementation Site as Reference

REFERENCE		DISPLAY DATES
33 30 09.0 N.	CLASS = A	DATA 01-28-14
83 15 37.0 W.	Current Spacings to 3rd Adj.	SEARCH 01-28-14
----- Channel 264 - 100.7 MHz -----		

Call	Channel	Location	Power	Azi	Dist	FCC	Margin
Lat.	Lng.	Ant	HAAT				
WLRR	LIC 264A	Milledgeville	GA	174.9	43.27	114.5	-71.2
33 06 50.0	83 13 08.0	CN	3.000 kW	100 M			
Starstation Radio, LLC. BMLH19950804KF							
# WPPP-LP	LIC 264L1	Athens	GA	347.2	49.68	66.5	-16.8
33 56 21.0	83 22 47.0		0.100 kW	26 M			
The Web Rights Association BLL20041101AAB							
WNNX	CP -Z 263C2	College Park	GA	285.6	108.50	105.5	3.0
33 45 34.0	84 23 19.0	ZCX	13.500 kW	293 M			
Susquehanna Radio Corp. BPH20110118ACY							
WNNX	LIC-Z 263C2	College Park	GA	285.6	108.50	105.5	3.0
33 45 34.0	84 23 19.0	ZCX	12.500 kW	298 M			
Susquehanna Radio Corp. BLH20051004ABG							
WSSL-FM	LIC-N 263C0	Gray Court	SC	41.3	159.07	151.5	7.6
34 34 18.0	82 06 44.0	NCX	100.000 kW	381 M			
Capstar Tx Llc BLH20050923AFT							
WEEZ	LIC 210A	Greensboro	GA	73.9	18.30	9.5	8.8
33 32 53.0	83 04 15.0	CX	0.630 kW	95 M			
Community Public Radio, In BLED20110810AAV							
AL7871	RSV-A 261A	Watkinsville	GA	0.6	40.97	30.5	10.5
33 52 19.0	83 15 19.0		6.000 kW	100 M			
RM10287							
WPUP	LIC-N 261A	Watkinsville	GA	345.3	50.30	30.5	19.8
33 56 28.0	83 23 55.0	NCX	4.300 kW	88 M			
Cox Radio, Inc. BLH20080626ABC							
WAKB	LIC-N 265C3	Hephzibah	GA	96.9	110.90	88.5	22.4
33 22 40.0	82 04 37.0	NCX	16.000 kW	92 M			
Perry Broadcasting Of Augu BLH20091117ACN							

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RSV-R = reserved - needs protection, RSV-A = allocation.  
All separation margins include rounding

# - an alternate channel (229L1) is available for WPPP-LP

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**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A2**

Allocation/Clearance Study for WPPP-LP Alternate Frequency  
for LPFM facility Athens, Georgia  
Using Present WPPP-LP License Coordinates

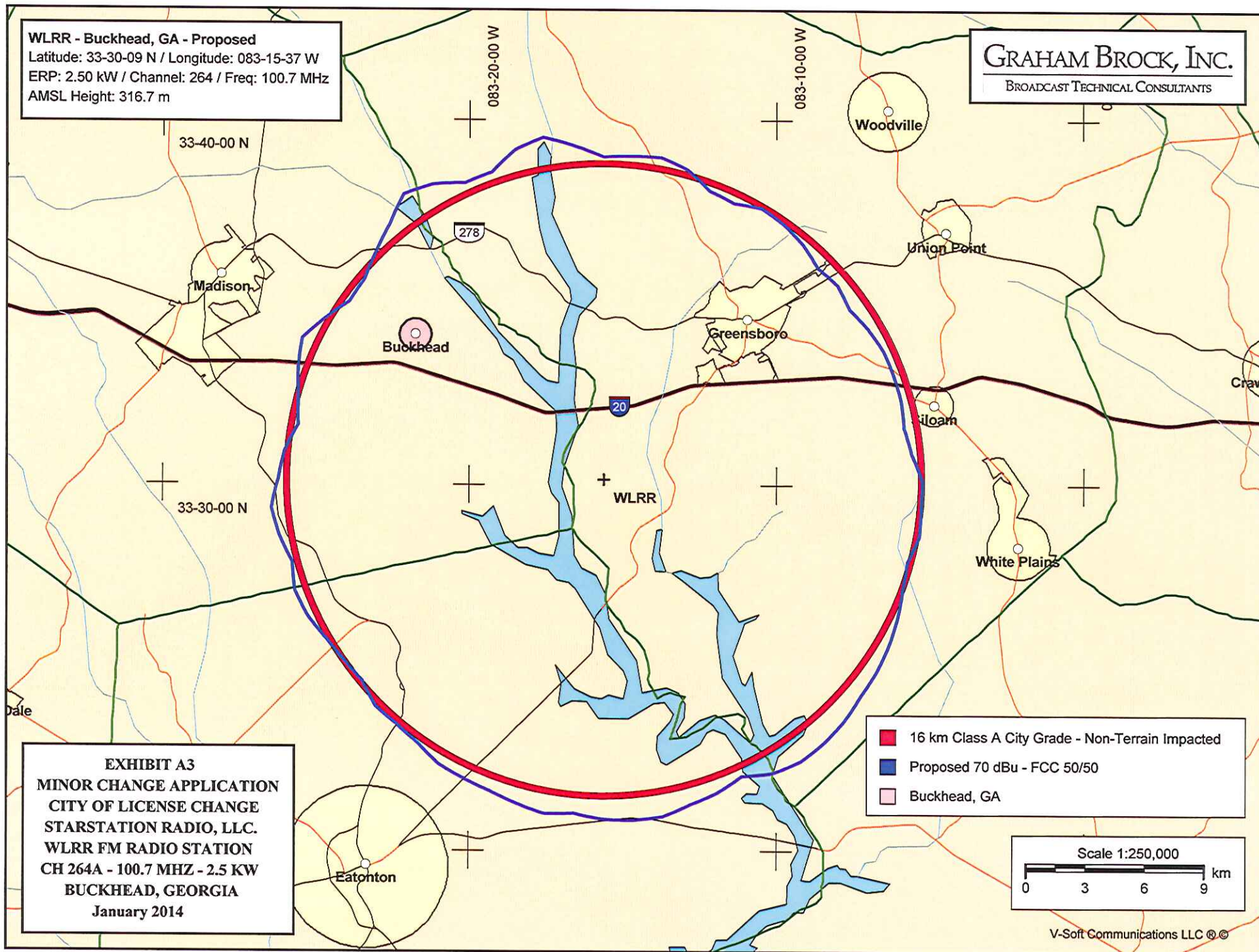
REFERENCE		CLASS = L1	DISPLAY DATES
33 56 21.0 N.			DATA 01-28-14
83 22 47.0 W.	Current	Spacings to 2nd Adj.	SEARCH 01-28-14
----- Channel 229 - 93.7 MHz -----			

Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
WSTR	LIC 231C0	Smyrna	GA	257.5	90.61	84.0	6.6
33 45 33.0	84 20 05.0	CX	100.000 kW	310 M			
Lincoln Financial Media Co BLH20060523ADI							
AL5038	RSV-A 231C0	Smyrna	GA	257.5	90.64	84.0	6.6
33 45 35.0	84 20 07.0		100.000 kW	450 M			
RM10983							
W228CA	LIC-D 228D	Oakwood	GA	322.4	37.67	28.0	9.7
34 12 27.0	83 37 48.0	DC	0.250 kW	419 M			
Tugart Properties, Llc BLFT20110606AAI							
WFBC-FM	LIC 229C	Greenville	SC	28.3	148.19	130.0	18.2
35 06 43.0	82 36 24.0	CX	100.000 kW	552 M			
Entercom License, Llc BLH20021022AAJ							
WPEZ	LIC-N 229C1	Jeffersonville	GA	187.4	132.61	111.0	21.6
32 45 12.0	83 33 46.0	NCX	100.000 kW	207 M			
Cumulus Licensing Llc BLH20020529ABR							
W228CA	CP -D 228D	Suwanee	GA	292.8	55.22	28.0	27.2
34 07 47.0	83 55 56.0	DC	0.250 kW	265 M			
Tugart Properties, Llc BPFT20110622ABN							

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RSV-R = reserved - needs protection, RSV-A = allocation.

**WLRR - Buckhead, GA - Proposed**  
Latitude: 33-30-09 N / Longitude: 083-15-37 W  
ERP: 2.50 kW / Channel: 264 / Freq: 100.7 MHz  
AMSL Height: 316.7 m

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS

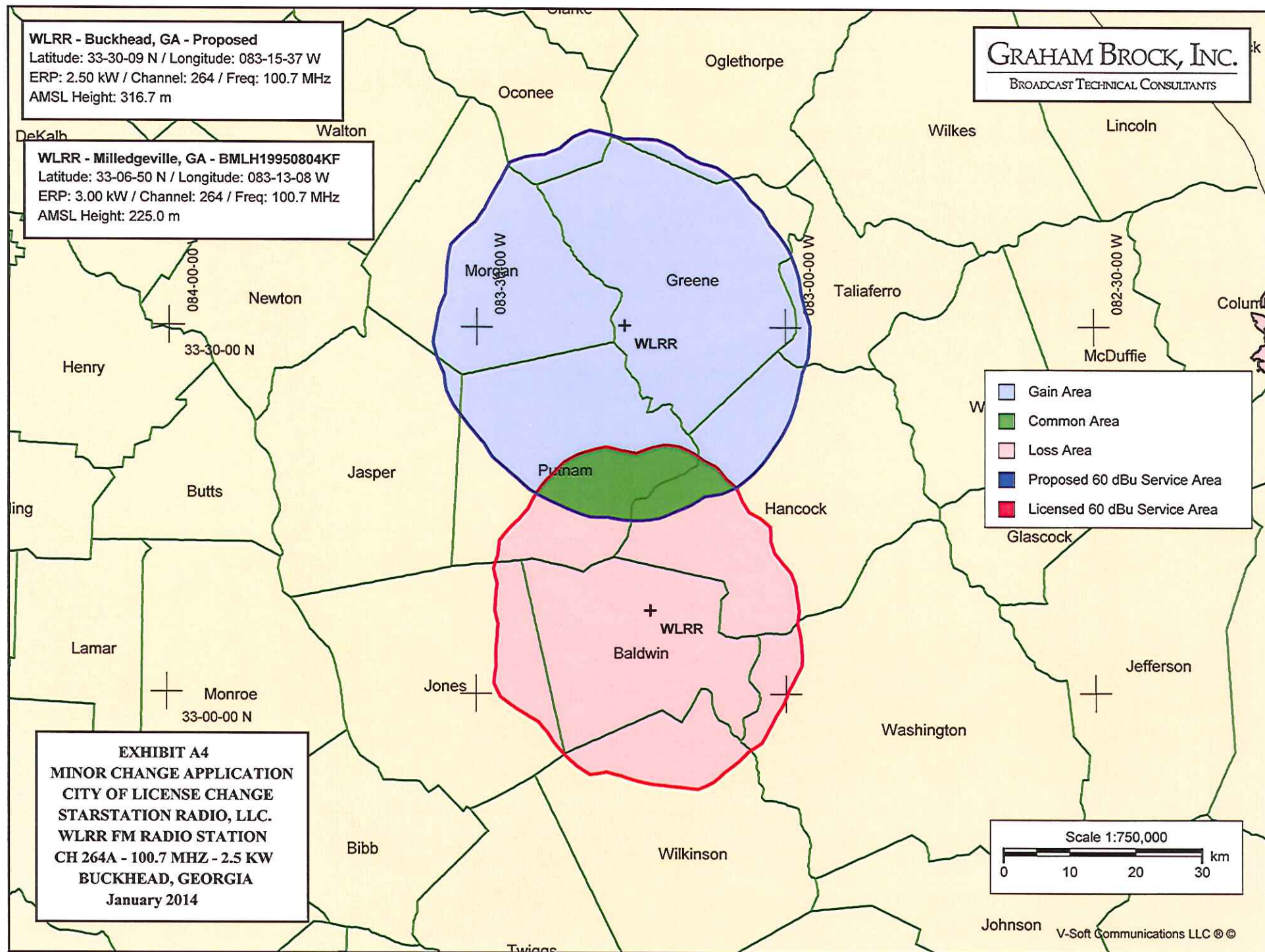




**WLRR - Buckhead, GA - Proposed**  
Latitude: 33-30-09 N / Longitude: 083-15-37 W  
ERP: 2.50 kW / Channel: 264 / Freq: 100.7 MHz  
AMSL Height: 316.7 m

**WLRR - Milledgeville, GA - BMLH19950804KF**  
Latitude: 33-06-50 N / Longitude: 083-13-08 W  
ERP: 3.00 kW / Channel: 264 / Freq: 100.7 MHz  
AMSL Height: 225.0 m

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS





WLRR - Milledgeville, GA - BMLH19950804KF  
Latitude: 33-06-50 N / Longitude: 083-13-08 W  
ERP: 3.00 kW / Channel: 264 / Freq: 100.7 MHz  
AMSL Height: 225.0 m

## LOSS AREA SERVICES

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

Service Count: Loss Area

- 1
- 2
- 3
- 4
- 5 or more

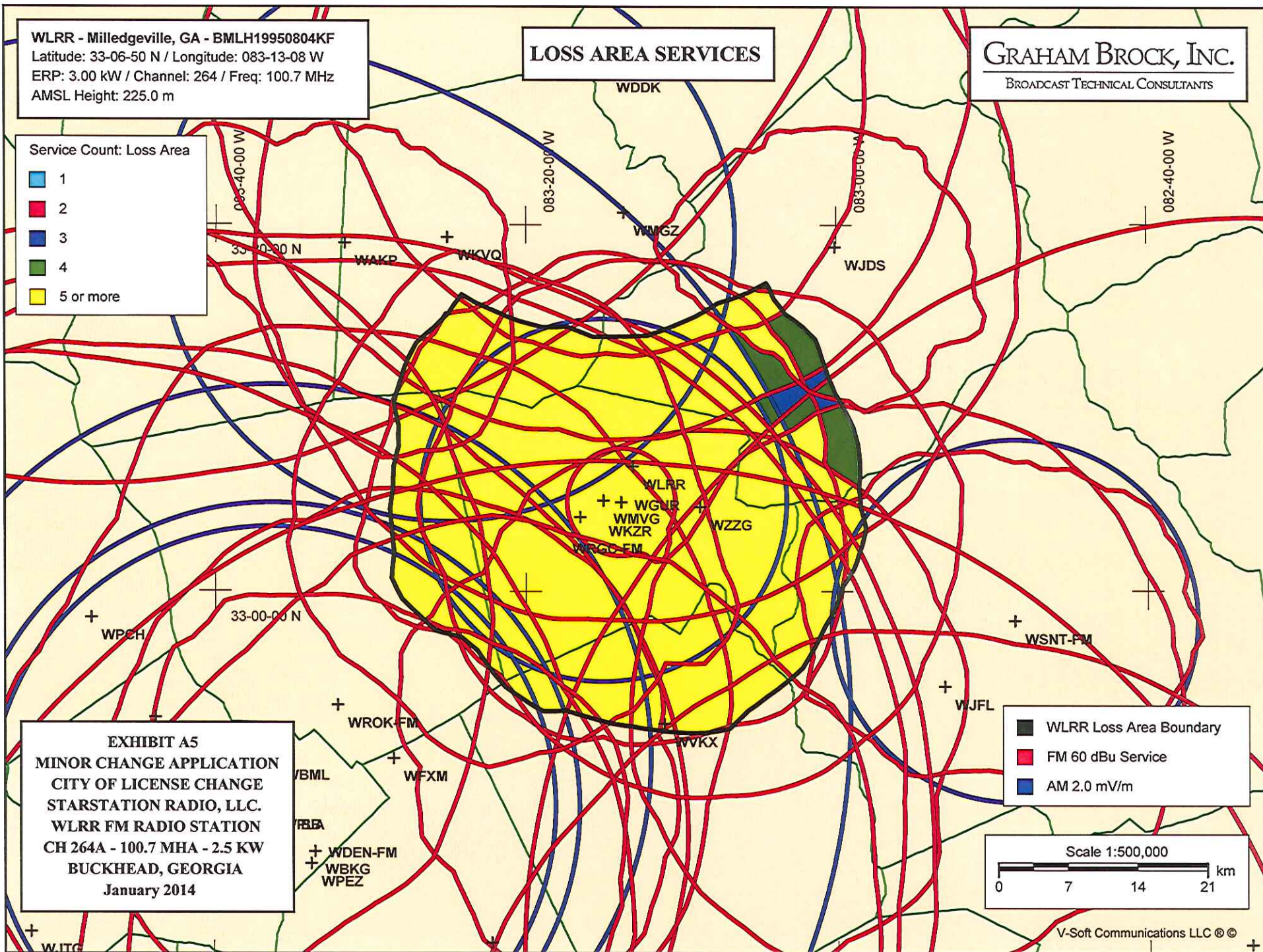


EXHIBIT A5  
MINOR CHANGE APPLICATION  
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**January 2014**

**EXHIBIT A6**

**Loss Area Population and Service Report**

Service Count Population Report - Service Count: WLRR Loss Area

Reference Area: WLRR Loss Area

Counting Grid Cell Size: 0.05 sq. km

Population Database: 2010 US Census (PL)

Services Included in Count:

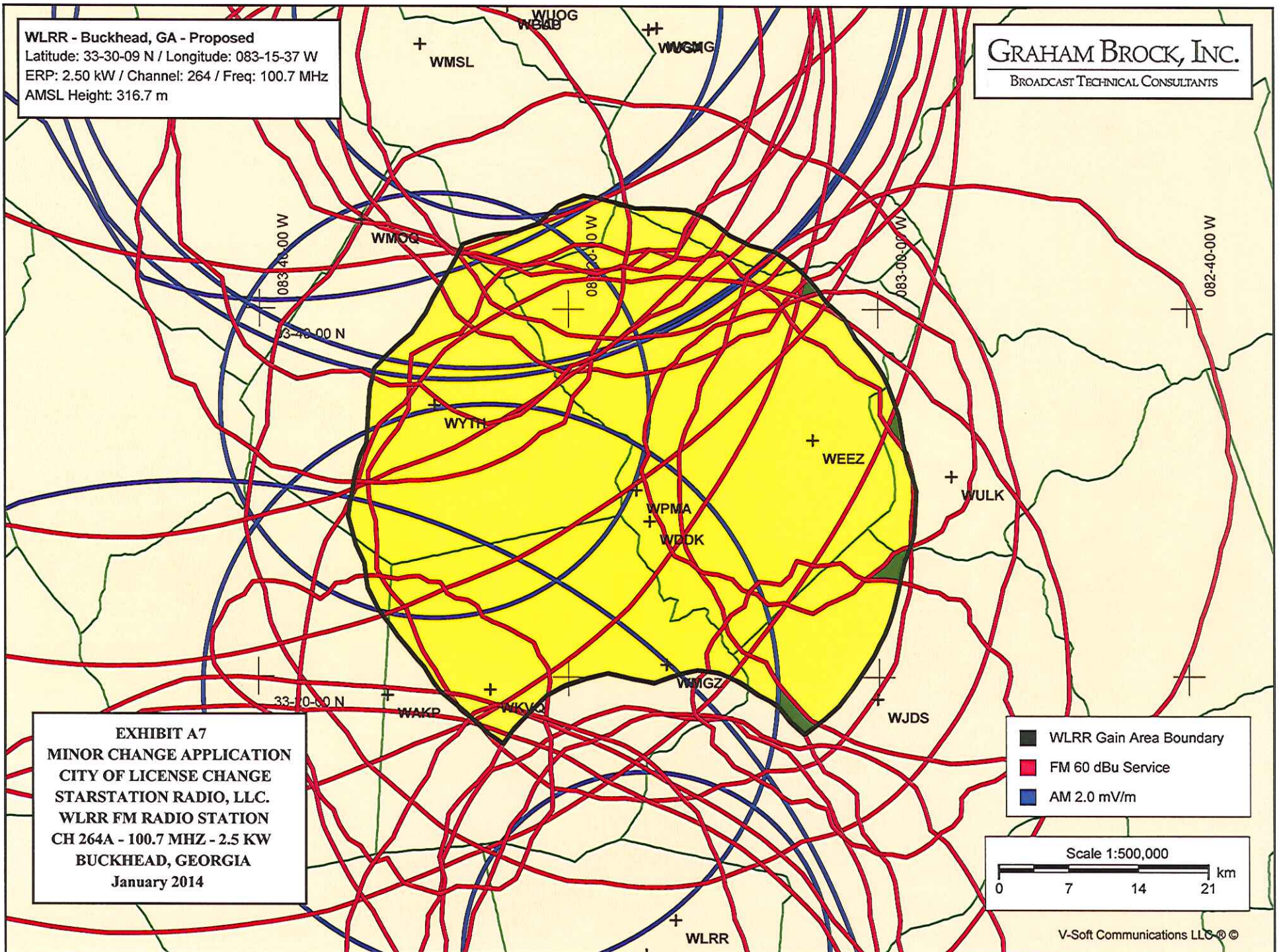
WRGC-FM (202):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WJDS (204):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WBKG (205):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WAKP (206):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMUM-FM (209):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPWB (213):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WJTG (217):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WZZG (220):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WKKZ (224):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPEZ (229):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WGUR (237):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WQZY (240):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPCH (243):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMGZ (249):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WDEN-FM (256):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WSNT-FM (260):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WJFL (270):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WKZR (272):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPMA (274):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WVKX (279):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WDDK (280):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WROK-FM (288):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WQBZ (292):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WYAY (294):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WFXM (296):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WSNT	:	2.0	mV/m		
WIBB	:	2.0	mV/m		
WPLA	:	2.0	mV/m		
WMAC	:	2.0	mV/m		
WBML	:	2.0	mV/m		
WMVG	:	2.0	mV/m		
WKVQ	:	2.0	mV/m		

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	0.00
2 Service	0	0	0.04
3 Service	24	19	14.19
4 Service	421	217	67.52
5 or more	56,906	27,382	1561.17
Reference Area	57,351	27,618	1642.92

	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	0	0	0.0 %
3 Service	24	24	0.0 %
4 Service	421	445	0.8 %
5 or more	56,906	57,351	100.0 %

**WLRR - Buckhead, GA - Proposed**  
Latitude: 33-30-09 N / Longitude: 083-15-37 W  
ERP: 2.50 kW / Channel: 264 / Freq: 100.7 MHz  
AMSL Height: 316.7 m

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS



**EXHIBIT A7**  
**MINOR CHANGE APPLICATION**  
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**CH 264A - 100.7 MHZ - 2.5 KW**  
**BUCKHEAD, GEORGIA**  
**January 2014**

■ WLRR Gain Area Boundary  
■ FM 60 dBu Service  
■ AM 2.0 mV/m

Scale 1:500,000  
0 7 14 21 km

V-Soft Communications LLC ©

**MINOR CHANGE APPLICATION**  
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**WLRR FM RADIO STATION**  
**CH 264A - 100.7 MHZ - 2.5 KW**  
**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A8**

**Gain Area Population and Service Report**

Service Count Population Report - Service Count: WLRR Gain Area

Reference Area: WLRR Gain Area

Counting Grid Cell Size: 0.05 sq. km

Population Database: 2010 US Census (PL)

Services Included in Count:

WRGC-FM (202):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WJDS (204):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMSL (205):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WAKP (206):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WEEZ (210):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WUOG (213):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WUGA (219):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WZZG (220):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMOQ (222):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPEZ (229):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WULK (234):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WSBB-FM (238):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WSRV (246):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMGZ (249):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WDEN-FM (256):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPUP (261):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WGMG (271):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WKZR (272):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPMA (274):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WDDK (280):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WFSH-FM (284):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WNGC (291):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WYAY (294):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMAC	:	2.0	mV/m		
WRFC	:	2.0	mV/m		
WMVG	:	2.0	mV/m		
WGAU	:	2.0	mV/m		
WKVQ	:	2.0	mV/m		
WYTH	:	2.0	mV/m		
WDUN	:	2.0	mV/m		
WBKZ	:	2.0	mV/m		

Count Area	Population	Housing Units	Area (sq. km)
1 Service	0	0	0.00
2 Service	0	0	0.00
3 Service	0	0	0.00
4 Service	40	21	21.80
5 or more	41,356	21,368	2274.98
Reference Area	41,396	21,389	2296.78

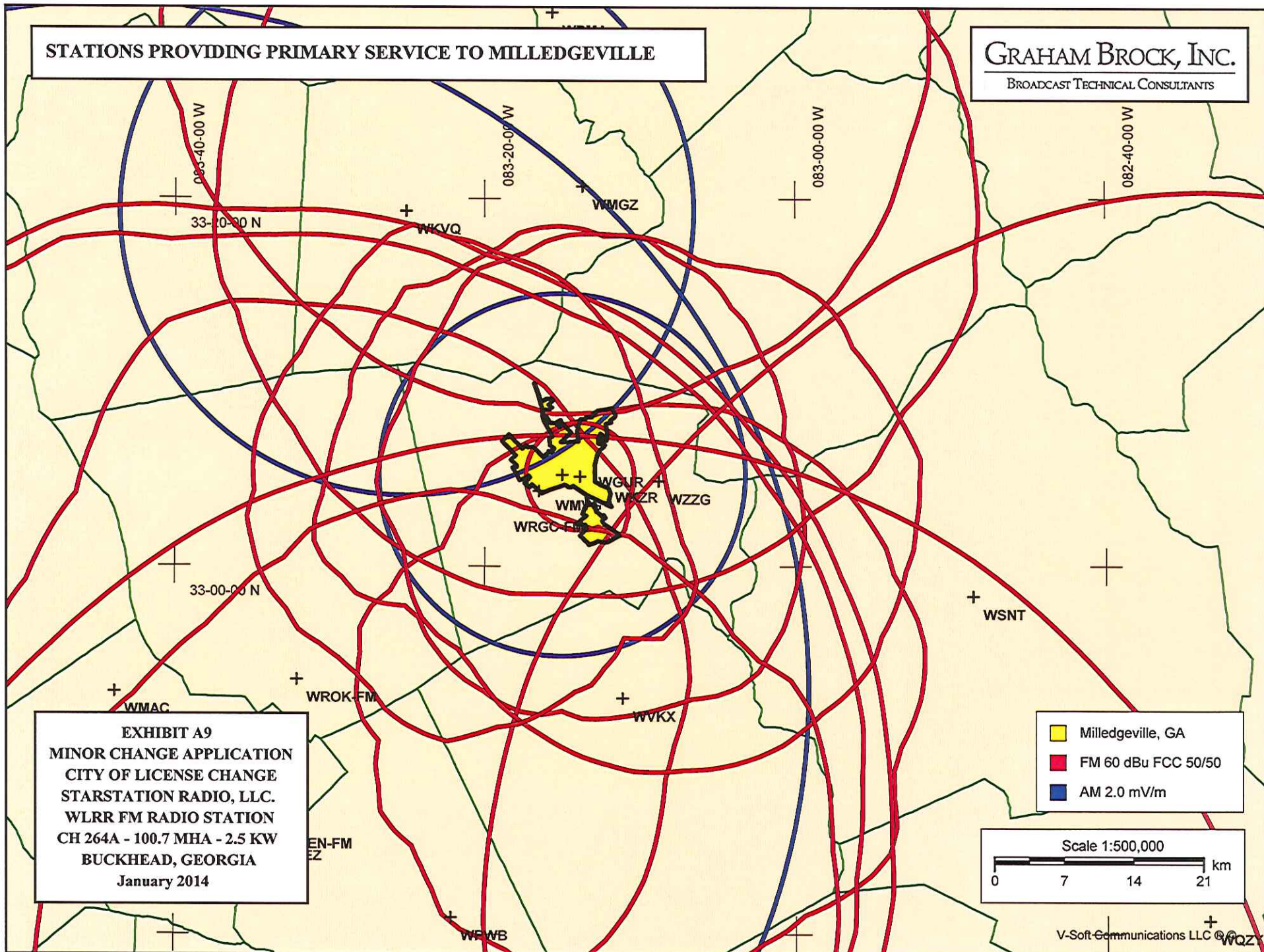
	Service Pop	Running Total	Percent
1 Service	0	0	0.0 %
2 Service	0	0	0.0 %
3 Service	0	0	0.0 %
4 Service	40	40	0.1 %
5 or more	41,356	41,396	100.0 %



**STATIONS PROVIDING PRIMARY SERVICE TO MILLEDGEVILLE**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



**EXHIBIT A9**  
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**CH 264A - 100.7 MHA - 2.5 KW**  
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**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A10**

**Stations Providing Primary Service to Milledgeville, Georgia**

Service Count Population Report - Service Count: Milledgeville, Georgia

Counting Grid Cell Size: 0.05 sq. km  
Population Database: 2010 US Census (PL)

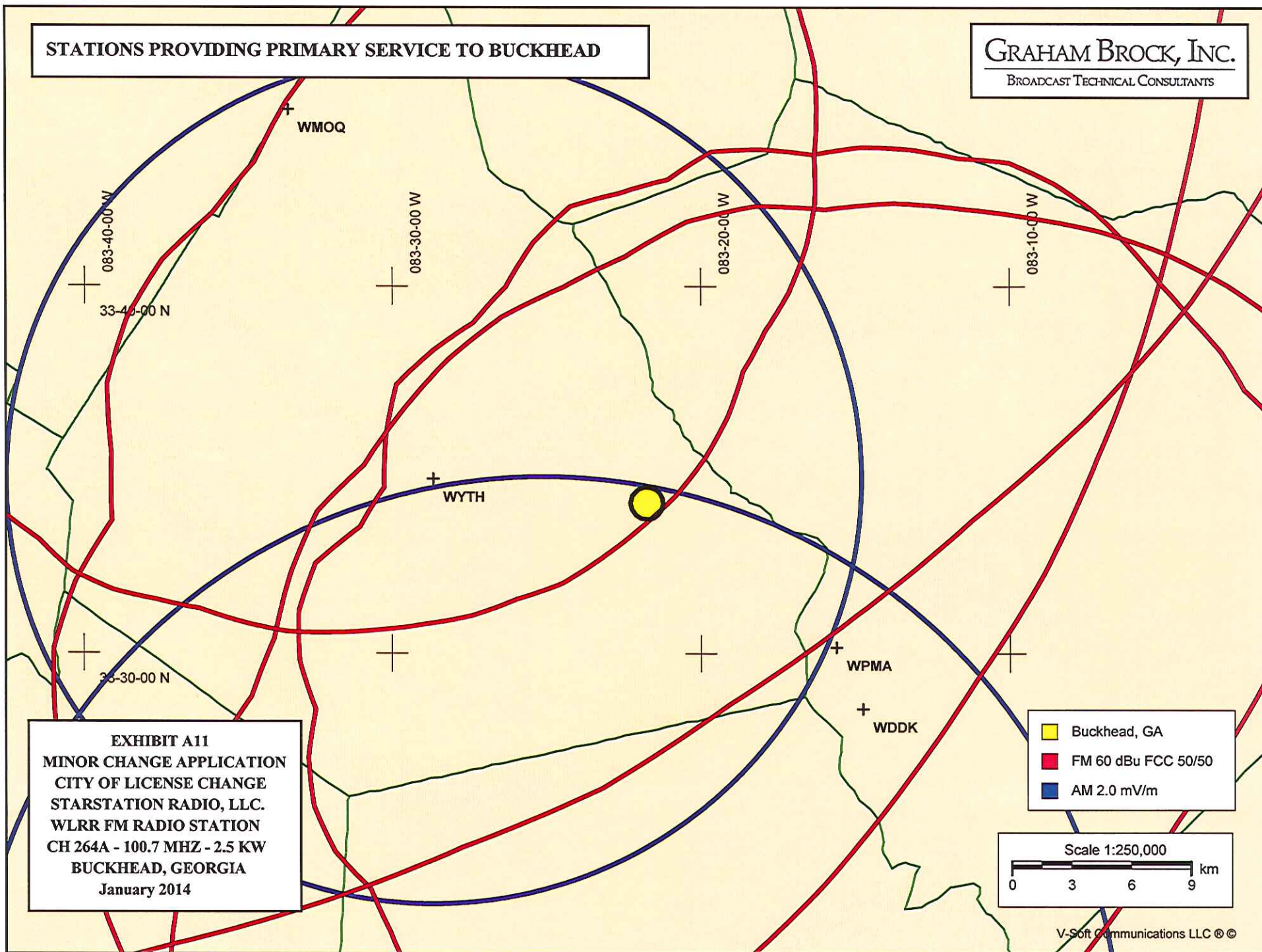
Services Included in Count:

	WRGC-FM (202):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WMUM-FM (209):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WPWB (213):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WZZG (220):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WPEZ (229):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WGUR (237):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WQZY (240):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WMGZ (249):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WDEN-FM (256):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WKZR (272):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WPMA (274):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WVKX (279):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
*	WROK-FM (288):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
	WMAC	:	2.0	mV/m		
	WMVG	:	2.0	mV/m		
*	WKVQ	:	2.0	mV/m		

\* Provides Service to a portion of Milledgeville

**STATIONS PROVIDING PRIMARY SERVICE TO BUCKHEAD**

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS



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**BUCKHEAD, GEORGIA**  
**January 2014**

**EXHIBIT A12**

**Stations Providing Primary Service to Buckhead, Georgia**

Service Count Population Report - Service Count: Buckhead, Georgia

Counting Grid Cell Size: 0.05 sq. km

Population Database: 2010 US Census (PL)

Services Included in Count:

WMOQ	(222):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WSRV	(246):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WMGZ	(249):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WPMA	(274):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WDDK	(280):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WFSH-FM	(284):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WYAY	(294):	FCC	F(50-50)	60.00	dBu	(FCC HAAT)
WKVQ	:			2.0	mV/m	
WYTH	:			2.0	mV/m	