

TECHNICAL STATEMENT
CONCERNING 307(B) ANALYSIS
FM BROADCAST STATION WILT(FM)
CAROLINA BEACH, NORTH CAROLINA
CHANNEL 283C3, 17 KW (MAX-DA), 120 M HAAT

1. Proposal

It is proposed to upgrade WILT(FM) from Channel 283A to Channel 283C3 and change the city of license from Wilmington, North Carolina to Carolina Beach, North Carolina. This is permitted according to the FCC Rules allowing class upgrades and community of license changes at the application for construction permit stage.*

2. City Populations and Local Service

The 2010 U.S. Census lists the community of Wilmington as a city in New Hanover County, North Carolina with a total population of 106,476. Wilmington is a part of the Wilmington, NC Urbanized Area. There are seven FM stations and three AM stations licensed to Wilmington. The radio stations licensed to Wilmington are:

1. WDVV(FM), Ch. 209C3
2. WWIL-FM, Ch. 213C3
3. WHQR(FM), Ch. 217C
4. WMNX, Ch. 247C1
5. WWQQ-FM, Ch. 267C2
6. WGNI(FM), Ch. 274C1
7. WILT(FM), Ch. 283A
8. WMFD, 630 kHz
9. WLSG, 1340 kHz

* See Report and Order in the Matter of Revision of Procedures Governing Amendments to the FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services, MB Docket No. 05-210, RM-10960, FCC 06-163, Released: November 29, 2006.

10. WWIL, 1490 kHz

Under the FCC's *Rural Radio* policy, the community of Wilmington is considered the Wilmington Urbanized area. Therefore, for evaluation of local services, consideration shall be with respect to local services to the Wilmington Urbanized area. The following service AM and FM stations are licensed to stations with communities that are part of the Wilmington Urbanized Area:

1. WDVV(FM), Wilmington, NC, Ch. 209C3
2. WWIL-FM, Wilmington, NC, Ch. 213C3
3. WHQR(FM), Wilmington, NC, Ch. 217C
4. WKXS-FM, Leland, NC, Ch. 233A
5. WMNX(FM), Wilmington, NC, Ch. 247C1
6. WWQQ-FM, Wilmington, NC, Ch. 267C2
7. WGNI(FM), Wilmington, NC, Ch. 274C1
8. WBNE(FM), Wrightsville Beach, NC, Ch. 279C2
9. WMYT(FM), Carolina Beach, NC, Ch. 294A
10. WMFD, Wilmington, NC, 630 kHz
11. WAAV, Leland, NC, 980 kHz
12. WLTT, Carolina Beach, NC, 1180 kHz
13. WLSG, Wilmington, NC, 1340 kHz
14. WWIL, Wilmington, NC, 1490 kHz

Based on the above, there are a total of 14 local aural services authorized to the Wilmington Urbanized Area, which includes Wilmington City. It is noted that the Wilmington Urbanized Area has a total population of 219,957 based on 2010 U.S. Census data.

The 2010 U.S. Census lists the community of Carolina Beach, NC as a town in New Hanover County, North Carolina with a total population of 5,706. Carolina Beach is part of the Wilmington Urbanized Area. The following full-service AM and FM stations are licensed to Carolina Beach:

1. WMYT(FM), Ch. 294A
2. WLTT, 1180 kHz

Based on this, the instant proposal will provide Carolina Beach with its third local commercial aural service.

Wilmington, and the Wilmington Urbanized area, will not be deprived of its sole existing local service since there are 10 local aural services licensed to Wilmington and 14 local aural services allotted to the Wilmington Urbanized Area. Indeed the community of Wilmington and the Wilmington Urbanized area are considered well-served according to FCC standards; and will continue to be well-served after the change in the WILT community of license.

3. Urbanized Area Considerations

The attached Figure 1 is a map showing the Wilmington and Carolina Beach city limits, in addition to the extent of the Wilmington Urbanized area. Both the communities of Wilmington and Carolina Beach are a part of the Wilmington Urbanized Area. Therefore the proposed change in community for WILT from Wilmington to Carolina Beach would be considered an 'intra-urban' move according to FCC policy.

As shown on Figure 1, the proposed WILT predicted 70 dBu contour encompasses virtually the entire licensed WILT 70 dBu contour. The licensed WILT 70 dBu contour covers 82% of the population within Wilmington urbanized area. In addition, it has been determined that the proposed WILT predicted 70 dBu contour covers 84% of the population within the Wilmington Urbanized Area. There will be no predicted 70 dBu service to the Wilmington Urbanized Area lost as a result of the instant proposal.

4. Gain and Loss Areas and Available Services

As indicated in the 60 dBu Gain-Loss Map included herein as Figure 2, the proposal will not result in any 60 dBu contour loss area. There will be only service gain in predicted 60 dBu service from the instant proposal.

The gain area contains a population of 35,924. The current WILT licensed 60 dBu service area contains a population of 255,310. Therefore the instant proposal will result in a 14% increase in predicted 60 dBu service, with no service loss.

As indicated in Figure 2, the predicted service gain area is well served by no less than 8 full-time aural services and as many as 14 full-time aural services.

5. 70 dBu and 60 dBu Coverage

The proposed WILT facility will provide 70 dBu and 60 dBu service to the following populations and areas:

Contour	Population (2010)	Land Area (sq. km)
70 dBu	209,297	1,076
60 dBu	289,515	2,543

The predicted contours on which the above figures were based were calculated in accordance with Section 73.313 of the FCC Rules using the U.S.G.S. 3-second terrain database and using 180 evenly-spaced radials. Population figures were calculated using a computer program that sums the populations for the 2010 Census block centroids falling within the subject contour.

6. Protected AM and FM Aural Services

An analysis was conducted of other protected AM and FM aural services available to Wilmington, the Wilmington Urbanized Area and Carolina Beach. The attached map at Figure 3 illustrates the other aural services contours employed in the analysis. The results indicate that Wilmington has no fewer than 17 aural services available; the Wilmington Urbanized Area has no less than 14 aural services available;

and, the community of Carolina Beach has new less than 18 aural services available. These figures were based on complete contour enclosure of the respective area by the various AM station 2 mV/m daytime groundwave contours or the FM station 60 dBu contours.

Figure 4 is a tabulation of all of the AM and FM stations considered in the analysis of other aural services.

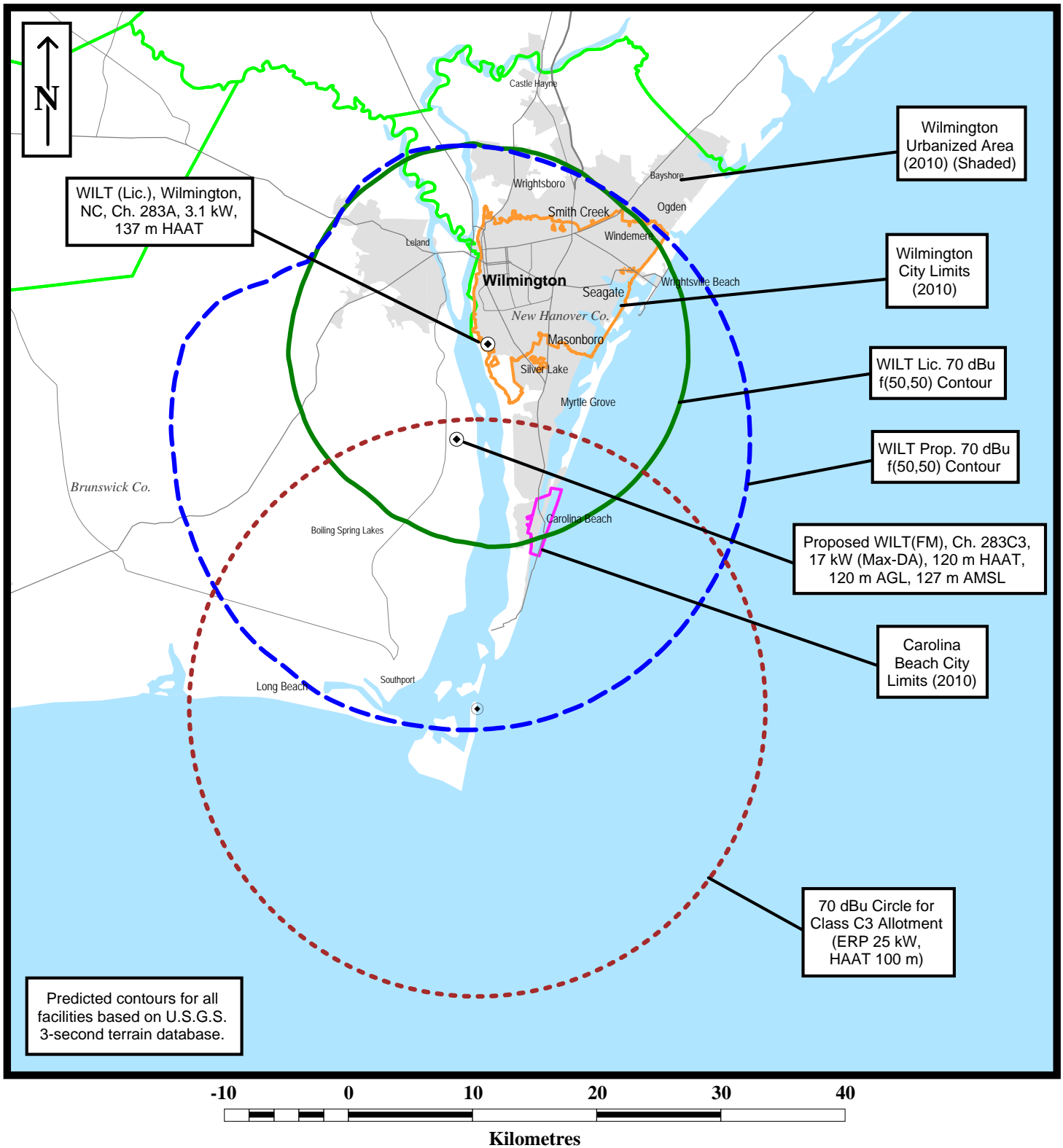
A handwritten signature in black ink, appearing to read "Louis R. du Treil, Jr.", with a stylized, cursive script.

Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237

November 10, 2014

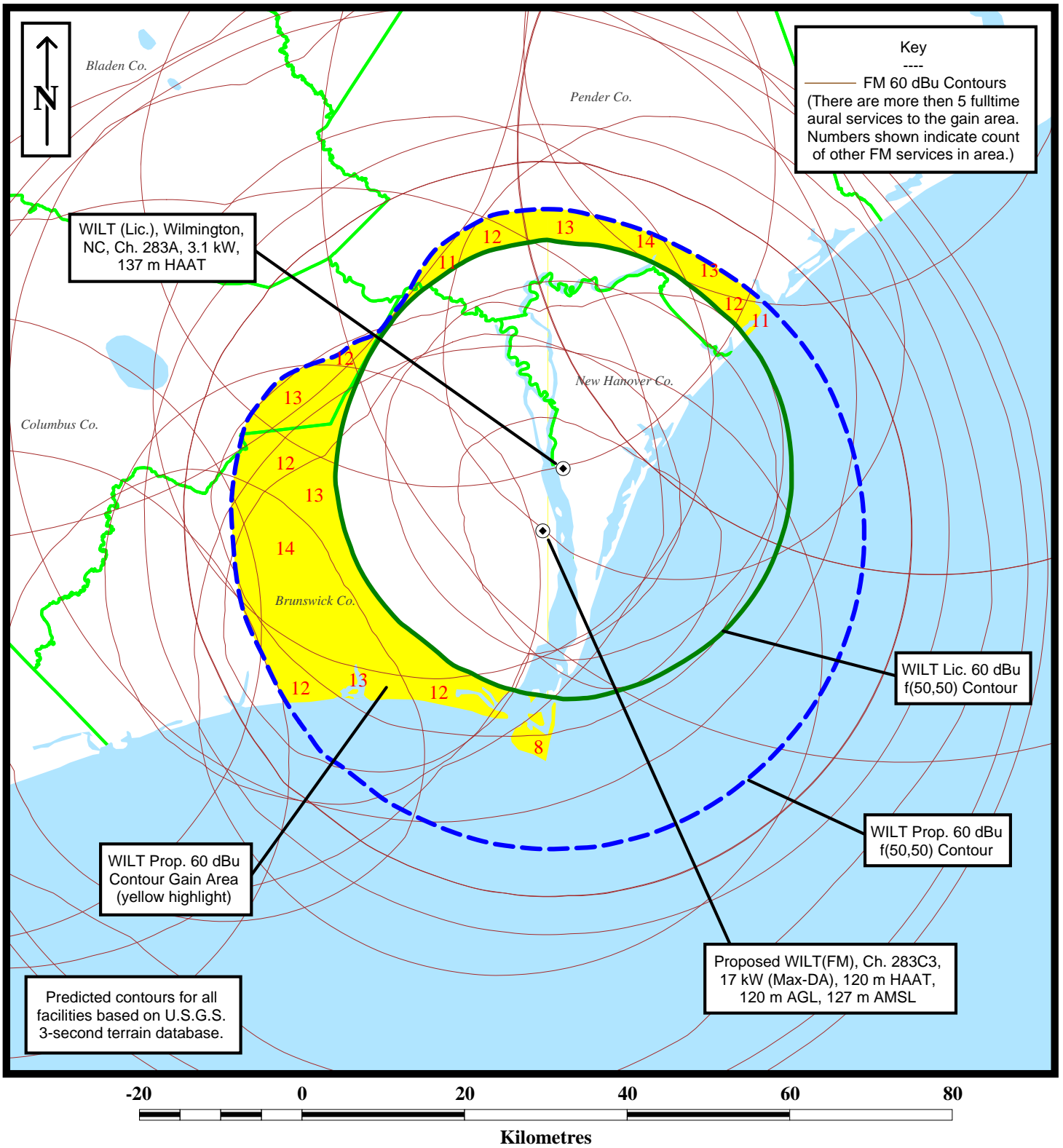
Figure 1



URBANIZED AREA COVERAGE

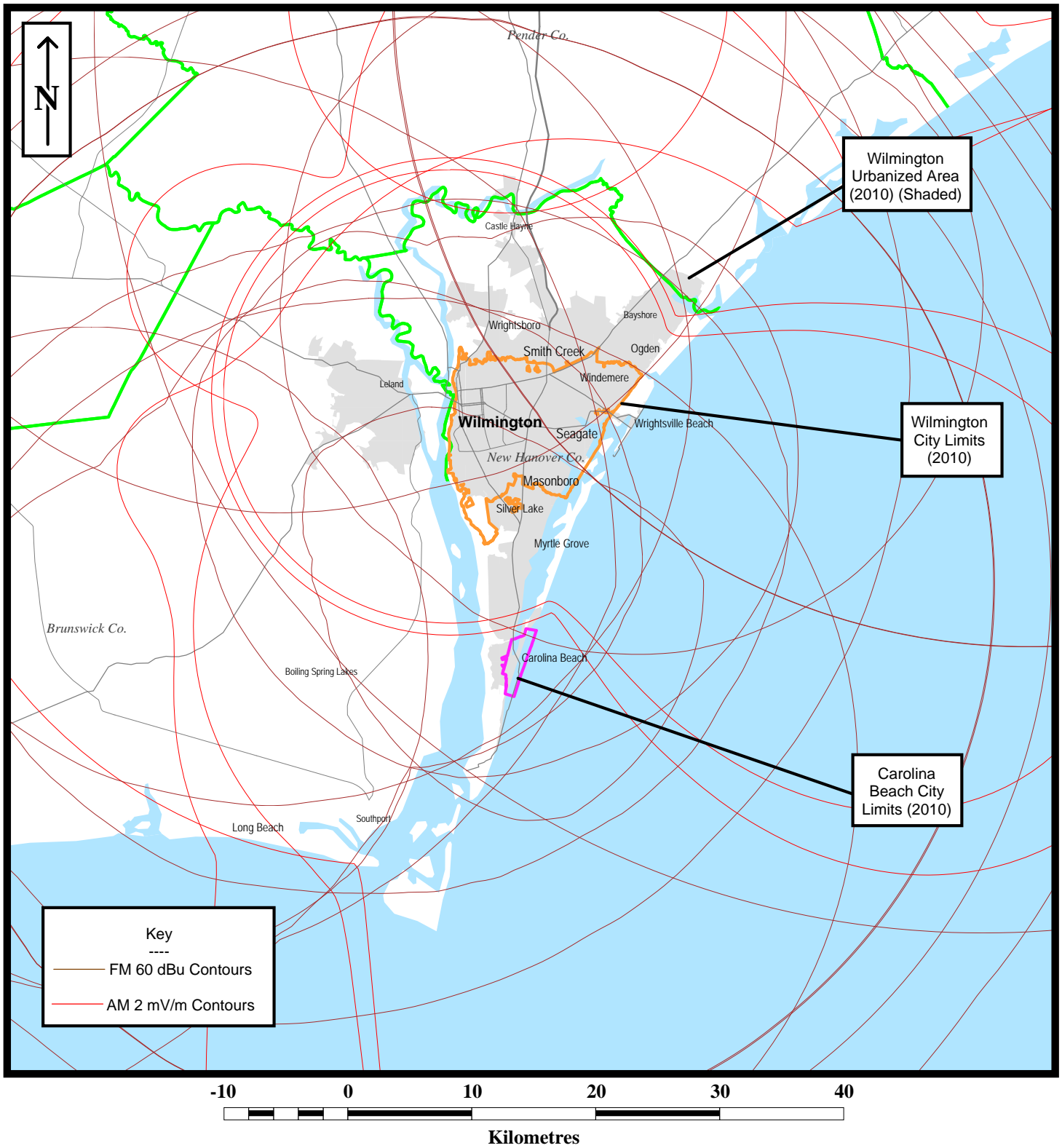
duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



60 DBU GAIN-LOSS MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida



OTHER AM AND FM PROTECTED SERVICES AVAILABLE TO SUBJECT COMMUNITIES

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TABULATION OF STATIONS CONSIDERED IN OTHER AURAL SERVICES ANALYSIS
 FM BROADCAST STATION WILT(FM)
 CAROLINA BEACH, NORTH CAROLINA
 CHANNEL 283C3, 17 KW (MAX-DA), 120 M HAAT

Call Sign	City	State	Class	Channel / Frequency	Power (kW)
WGHW	LOCKWOODS FOLLY TOWN	NC	C3	201	10
WZDG	SCOTTS HILL	NC	C3	203	8.9
WKVC	NORTH MYRTLE BEACH	SC	C1	205	100
WDVV	WILMINGTON	NC	C3	209	13.5
WJKA	JACKSONVILLE	NC	C3	211	17
WWIL-FM	WILMINGTON	NC	C3	213	4
WHQR	WILMINGTON	NC	C	217	100
WQSL	JACKSONVILLE	NC	C2	222	22.5
WLQB	OCEAN ISLE BEACH	NC	A	228	6
WNTB	TOPSAIL BEACH	NC	A	229	6
WKXS-FM	LELAND	NC	A	233	3.8
WVCO	LORIS	SC	C3	235	11
WMNX	WILMINGTON	NC	C1	247	100
WUIN	OAK ISLAND	NC	C3	252	18.5
WRMR	JACKSONVILLE	NC	C1	254	100
WZFX	WHITEVILLE	NC	C1	256	100
WKXB	BOILING SPRING LAKES	NC	C2	260	26
WWQQ-FM	WILMINGTON	NC	C2	267	18
WGNI	WILMINGTON	NC	C1	274	100
WBNE	WRIGHTSVILLE BEACH	NC	C2	279	22
WXQR-FM	JACKSONVILLE	NC	C2	288	19
WEZV	NORTH MYRTLE BEACH	SC	C3	290	17
WUDE	BOLIVIA	NC	A	292	6
WMYT	CAROLINA BEACH	NC	A	294	1.8
WAZO	SOUTHPORT	NC	C2	298	21