

MINOR CHANGE APPLICATION
JACKSON COUNTY BROADCASTING, INC.
WCJO (FM) RADIO STATION
CH 249A - 97.7 MHZ - 1.9 KW
JACKSON, OHIO
June 2007

EXHIBIT A

WCJO Shortages

As shown on Exhibit A1, operating on Channel 249A at its proposed/licensed transmitter site, WCJO does not meet the Commission's minimum distance separation requirements to four other stations: WQBE-FM, Channel 248B, Charleston, West Virginia; WMGA, Channel 250A, Kenova, West Virginia; WNCI, Channel 250B, Columbus, Ohio and WAXZ, Channel 249A, Georgetown, Ohio. The shortages are discussed below.

§73.213(c) Spacings

The shortages between WCJO and WNCI and WAXZ are based on the change in spacing rules made in 1989, which increased the maximum effective radiated power for Class A stations from 3.0 kilowatts to 6.0 kilowatts. The stations have remained shortspaced since that time and this instant application will not increase the shortage.¹ Since WCJO is proposing to operate at its existing site with power at or below the equivalent power of 3.0 kilowatts at 100.0 meters height above average terrain, §73.213(c)(1) of the rules applies. WCJO meets the former spacing requirements for a 3.0 kilowatt Class A station to both WNCI and WAXZ.

1) The licensee of WAXZ submitted an application to increase power above the equivalent of 3.0 kilowatts at 100 meters HAAT in BPH-20040308ADA. This application protected WCJO at 6.0 kilowatts at 100 meters HAAT. WAXZ was subsequently licensed in BLH-20050701ADC. As such, WCJO is effectively fully spaced under §73.207. However, for the purpose of this filing, §73.213(c)(1) is applied.

The shortage between WCJO and WQBE-FM is also a grandfathered 3.0 kilowatt shortspace. However, WQBE-FM filed an application to relocate (BPH-9546)² in which it requested and was granted a waiver of the former 3.0 kilowatt spacing rules toward WCJO, allowing it to be less than the required 105 kilometers (65 miles). WCJO and WQBE-FM have remained shortspaced since that time and this instant application will not alter the shortage. Since WCJO is proposing to operate at its existing site with power at or below the equivalent power of 3.0 kilowatts at 100.0 meters height above average terrain, it is believed that WCJO complies with §73.213(c)(1) of the rules with regard to WQBE-FM.

§73.215 Spacing

The shortage between WCJO and WMGA is addressed pursuant to §73.215 of the Commission's rules (WMGA and WCJO filed contingent applications in 2005 requesting processing pursuant to §73.215). JCB proposes to use the provisions of §73.215 of the Commission's rules to address this shortspace. The shortage to this station complies with §73.215(e) of the Commission's rules.

Exhibit A2 specifically demonstrates that there will be no prohibited overlap between the proposed WCJO and the authorized WMGA. The contours of WMGA are based on 3.5 kilowatts at 133 meters HAAT, as the station was authorized pursuant to §73.215 of the rules. Attached as Exhibits A3 and A4 are the tabulated distances to the protected and interfering

2) Covered by BLH-7326.

contours, along the pertinent arcs, of the proposed WCJO and authorized WMGA. Further, attached as Exhibit A5 are the tabulated and protected contours of the proposed facility, in ten degree increments. Again, there is no prohibited overlap between the facilities.

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EXHIBIT A1

Clearance Study for WCJO, Jackson, Ohio
Using Proposed/Licensed Site as Reference

REFERENCE	CLASS = A Int = A	DISPLAY DATES
39 01 45.0 N.	Current	DATA 05-30-07
82 35 51.0 W.	Spacings	SEARCH 05-30-07
----- Channel 249 - 97.7 MHz -----		

Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
WCJO	LIC-N 249A 39 01 45.0	Jackson 82 35 51.0	NCX 3.000 kW	OH 0.0 BLH-20050831AAY	0.00 91 M	115.0	-115.00
Jackson County Broadcasting							
* WQBE-FM	LIC 248B 38 24 22.0	Charleston 81 43 26.0	CN 50.000 kW	WV 132.2 BLH-7326	102.74 152 M	113.0	-10.26
Bristol Broadcasting Company							
** WMGA	LIC-N 250A 38 25 26.0	Kenova 82 32 08.0	NCX 3.500 kW	WV 175.4 BLH-20060313ABM	67.40 133 M	72.0	-4.60
Connoisseur Media, LLC							
* WNCI	LIC-D 250B 39 58 10.0	Columbus 83 00 10.0	DEN 175.000 kW	OH 341.7 BLH-7323	110.05 171 M	113.0	-2.95
Citicasters Licenses, L.P.							
* WAXZ	LIC-N 249A 38 46 50.0	Georgetown 83 51 55.0	NCX 5.100 kW	OH 256.3 BLH-20050701ADC	113.38 107 M	115.0	-1.62
First Broadcasting Capital							
WAXZ	CP 249A 38 10 33.0	Salt Lick 83 24 28.0	CX 3.000 kW	KY 216.8 BPH-20051212ACO	118.13 143 M	115.0	3.13
First Broadcasting Capital							
WVNU	LIC 248A 39 24 28.0	Greenfield 83 21 15.0	CN 2.300 kW	OH 303.1 BLH-19980729KE	77.69 164 M	72.0	5.69
Southern Ohio Broadcasting							
AL8211	RSV 249A 38 10 15.0	Salt Lick 83 34 31.0	KY 222.0 6.000 kW	RM-11096	127.80 100 M	115.0	12.80
WILE-FM							
	LIC 249A 40 02 24.0	Byesville 81 38 50.0	CN 1.800 kW	OH 35.6 BLH-19941027KB	138.81 126 M	115.0	23.81
Avc Communications, Inc.							
WLGN-FM	CP 252A 39 31 43.0	Logan 82 23 06.0	CX 6.000 kW	OH 18.2 BPH-20060927AEU	58.40 67 M	31.0	27.40
Wlgn, LLC							

- * Note: These shortspacings are grandfathered pursuant to §73.213(c).
- ** Note: This shortspace is addressed pursuant to §73.215.

Graham Brock, Inc. - Broadcast Technical Consultants

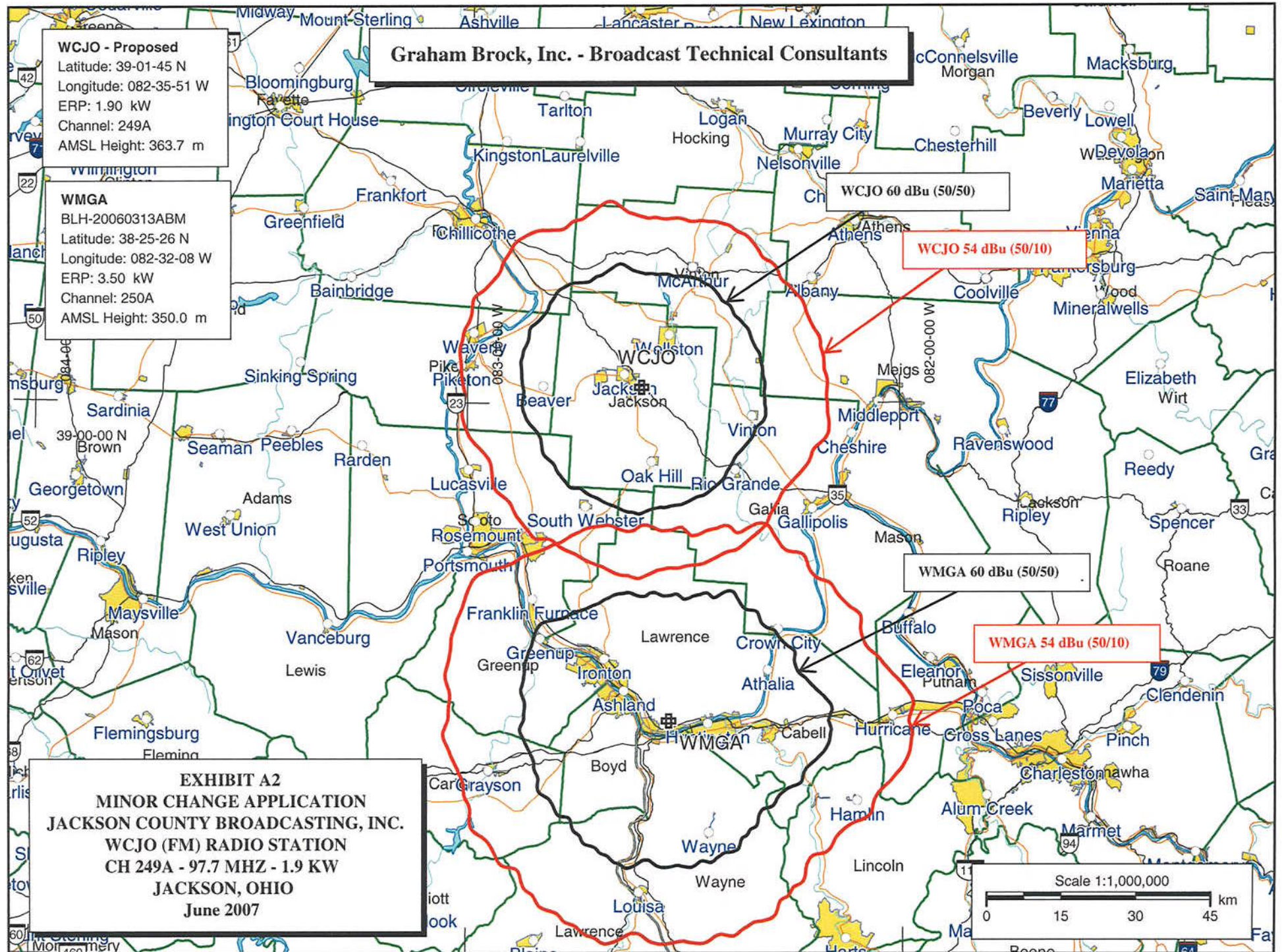
WCJO - Proposed

Latitude: 39-01-45 N
Longitude: 082-35-51 W
ERP: 1.90 kW
Channel: 249A
AMSL Height: 363.7 m

WMGA

BLH-20060313ABM
Latitude: 38-25-26 N
Longitude: 082-32-08 W
ERP: 3.50 kW
Channel: 250A
AMSL Height: 350.0 m

EXHIBIT A2
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EXHIBIT A3

WCJO - Proposed
Channel = 249A
Max ERP = 1.9 kW
RCAMSL = 363.68 M
N. Lat = 39 01 45
W. Lng = 82 35 51

WMGA - BLH-20060313ABM
Channel = 250A
Max ERP = 3.5 kW
RCAMSL = 350 M
N. Lat = 38 25 26
W. Lng = 82 32 08

Protected
60 dBu

Interfering
54 dBu

30 second terrain

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
155.0	001.9000	0132.3	024.7	006.4	003.5000	0100.2	045.1	51.1
156.0	001.9000	0132.6	024.7	005.9	003.5000	0100.2	044.8	51.2
157.0	001.9000	0132.9	024.7	005.5	003.5000	0103.0	044.6	51.5
158.0	001.9000	0133.3	024.8	005.0	003.5000	0103.0	044.4	51.6
159.0	001.9000	0133.9	024.8	004.5	003.5000	0103.0	044.2	51.7
160.0	001.9000	0134.4	024.9	004.0	003.5000	0105.5	043.9	52.0
161.0	001.9000	0134.4	024.9	003.5	003.5000	0105.5	043.8	52.1
162.0	001.9000	0133.7	024.8	003.0	003.5000	0105.1	043.7	52.1
163.0	001.9000	0132.7	024.7	002.4	003.5000	0103.5	043.6	52.0
164.0	001.9000	0131.7	024.7	001.8	003.5000	0103.5	043.5	52.0
165.0	001.9000	0130.9	024.6	001.3	003.5000	0102.2	043.5	51.9
166.0	001.9000	0130.4	024.6	000.7	003.5000	0102.2	043.4	52.0
167.0	001.9000	0130.5	024.6	000.2	003.5000	0101.8	043.3	52.0
168.0	001.9000	0131.0	024.6	359.6	003.5000	0101.8	043.1	52.0
169.0	001.9000	0130.8	024.6	359.1	003.5000	0101.5	043.1	52.1
170.0	001.9000	0129.4	024.5	358.5	003.5000	0101.3	043.1	52.0
171.0	001.9000	0128.3	024.4	357.9	003.5000	0101.3	043.1	52.0
172.0	001.9000	0128.3	024.4	357.4	003.5000	0102.6	043.1	52.1
173.0	001.9000	0128.9	024.4	356.8	003.5000	0102.6	043.0	52.2
174.0	001.9000	0129.1	024.4	356.2	003.5000	0104.8	043.0	52.3
175.0	001.9000	0129.5	024.5	355.7	003.5000	0104.8	042.9	52.4
176.0	001.9000	0131.2	024.6	355.1	003.5000	0106.9	042.8	52.6
177.0	001.9000	0133.4	024.8	354.5	003.5000	0106.9	042.6	52.6
178.0	001.9000	0135.4	024.9	353.9	003.5000	0108.8	042.5	52.8
179.0	001.9000	0137.7	025.1	353.3	003.5000	0109.4	042.4	52.9
180.0	001.9000	0140.1	025.3	352.7	003.5000	0109.4	042.2	53.0
181.0	001.9000	0142.1	025.5	352.1	003.5000	0109.1	042.1	53.0
182.0	001.9000	0141.0	025.4	351.5	003.5000	0109.1	042.3	53.0
183.0	001.9000	0139.5	025.3	351.0	003.5000	0107.2	042.5	52.7
184.0	001.9000	0138.0	025.1	350.4	003.5000	0105.0	042.7	52.5
185.0	001.9000	0138.1	025.2	349.9	003.5000	0105.0	042.8	52.4
186.0	001.9000	0138.1	025.2	349.3	003.5000	0104.8	042.9	52.4
187.0	001.9000	0137.4	025.1	348.8	003.5000	0104.8	043.1	52.3
188.0	001.9000	0136.3	025.0	348.3	003.5000	0105.2	043.3	52.2
189.0	001.9000	0134.7	024.9	347.8	003.5000	0105.2	043.6	52.1
190.0	001.9000	0133.1	024.8	347.3	003.5000	0107.0	043.9	52.1

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EXHIBIT A4

WMGA - BLH-20060313ABM
Channel = 250A
Max ERP = 3.5 kW
RCAMSL = 350 M
N. Lat = 38 25 26
W. Lng = 82 32 08

WCJO - Proposed
Channel = 249A
Max ERP = 1.9 kW
RCAMSL = 363.68 M
N. Lat = 39 01 45
W. Lng = 82 35 51

Protected
60 dBu

Interfering
54 dBu

30 second terrain

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
335.0	003.5000	0124.6	027.6	188.5	001.9000	0136.3	042.6	51.8
336.0	003.5000	0125.1	027.6	188.0	001.9000	0136.3	042.3	51.9
337.0	003.5000	0125.4	027.7	187.4	001.9000	0137.4	042.1	52.1
338.0	003.5000	0124.7	027.6	186.8	001.9000	0137.4	041.9	52.2
339.0	003.5000	0123.6	027.5	186.2	001.9000	0138.1	041.8	52.3
340.0	003.5000	0122.0	027.4	185.5	001.9000	0138.1	041.7	52.3
341.0	003.5000	0120.9	027.3	184.8	001.9000	0138.1	041.6	52.4
342.0	003.5000	0120.2	027.2	184.2	001.9000	0138.0	041.4	52.4
343.0	003.5000	0119.0	027.1	183.5	001.9000	0138.0	041.4	52.4
344.0	003.5000	0116.3	026.8	182.8	001.9000	0139.5	041.4	52.5
345.0	003.5000	0112.5	026.5	182.0	001.9000	0141.0	041.7	52.5
346.0	003.5000	0109.1	026.1	181.3	001.9000	0142.1	041.9	52.4
347.0	003.5000	0107.0	025.9	180.6	001.9000	0142.1	042.0	52.4
348.0	003.5000	0105.2	025.7	179.9	001.9000	0140.1	042.1	52.2
349.0	003.5000	0104.8	025.6	179.3	001.9000	0137.7	042.0	52.1
350.0	003.5000	0105.0	025.7	178.7	001.9000	0137.7	041.9	52.2
351.0	003.5000	0107.2	025.9	178.2	001.9000	0135.4	041.6	52.2
352.0	003.5000	0109.1	026.1	177.6	001.9000	0135.4	041.4	52.3
353.0	003.5000	0109.4	026.1	177.0	001.9000	0133.4	041.3	52.2
354.0	003.5000	0108.8	026.1	176.3	001.9000	0131.2	041.3	52.1
355.0	003.5000	0106.9	025.9	175.7	001.9000	0131.2	041.5	52.0
356.0	003.5000	0104.8	025.6	175.1	001.9000	0129.5	041.8	51.8
357.0	003.5000	0102.6	025.4	174.5	001.9000	0129.1	042.0	51.6
358.0	003.5000	0101.3	025.2	173.9	001.9000	0129.1	042.2	51.6
359.0	003.5000	0101.5	025.3	173.3	001.9000	0128.9	042.2	51.5
000.0	003.5000	0101.8	025.3	172.7	001.9000	0128.9	042.2	51.5
001.0	003.5000	0102.2	025.3	172.1	001.9000	0128.3	042.3	51.5
002.0	003.5000	0103.5	025.5	171.5	001.9000	0128.3	042.2	51.5
003.0	003.5000	0105.1	025.7	170.8	001.9000	0128.3	042.1	51.6
004.0	003.5000	0105.5	025.7	170.2	001.9000	0129.4	042.2	51.6
005.0	003.5000	0103.0	025.4	169.7	001.9000	0129.4	042.5	51.4
006.0	003.5000	0100.2	025.1	169.3	001.9000	0130.8	043.0	51.3
007.0	003.5000	0097.8	024.8	168.8	001.9000	0130.8	043.4	51.2
008.0	003.5000	0098.3	024.9	168.3	001.9000	0131.0	043.5	51.1
009.0	003.5000	0099.5	025.0	167.7	001.9000	0131.0	043.5	51.1
010.0	003.5000	0101.9	025.3	167.0	001.9000	0130.5	043.4	51.1

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EXHIBIT A5

N. Lat. = 39 01 45 - Tabulated Protected and Interfering Contour Data
W. Lng. = 82 35 51 - WCJO Radio Station, Jackson, Ohio

HAAT and Distance to Contour - FCC Method - NGDC 30 SEC								
Azi.	HAAT	ERP kW	dBk	Field	60-F5	40-F1	54-F1	100-F1
000	111.5	1.9000	2.79	1.000	22.97	71.20	34.36	2.06
010	112.0	1.9000	2.79	1.000	23.02	71.29	34.44	2.06
020	119.8	1.9000	2.79	1.000	23.71	72.63	35.60	2.10
030	129.4	1.9000	2.79	1.000	24.47	74.22	36.85	2.15
040	124.6	1.9000	2.79	1.000	24.09	73.45	36.25	2.12
050	121.7	1.9000	2.79	1.000	23.86	72.96	35.86	2.11
060	126.5	1.9000	2.79	1.000	24.24	73.75	36.48	2.13
070	125.9	1.9000	2.79	1.000	24.20	73.66	36.41	2.13
080	130.5	1.9000	2.79	1.000	24.56	74.41	37.00	2.15
090	132.2	1.9000	2.79	1.000	24.69	74.68	37.21	2.16
100	139.6	1.9000	2.79	1.000	25.28	75.87	38.14	2.20
110	127.6	1.9000	2.79	1.000	24.33	73.94	36.63	2.14
120	121.7	1.9000	2.79	1.000	23.86	72.96	35.86	2.11
130	120.1	1.9000	2.79	1.000	23.74	72.70	35.65	2.11
140	132.9	1.9000	2.79	1.000	24.75	74.80	37.30	2.16
150	136.1	1.9000	2.79	1.000	25.00	75.32	37.71	2.18
160	134.4	1.9000	2.79	1.000	24.87	75.04	37.49	2.17
170	129.4	1.9000	2.79	1.000	24.47	74.23	36.86	2.15
180	140.1	1.9000	2.79	1.000	25.31	75.94	38.19	2.20
190	133.1	1.9000	2.79	1.000	24.77	74.83	37.33	2.16
200	124.2	1.9000	2.79	1.000	24.06	73.38	36.19	2.12
210	119.6	1.9000	2.79	1.000	23.69	72.61	35.58	2.10
220	126.2	1.9000	2.79	1.000	24.22	73.71	36.45	2.13
230	116.3	1.9000	2.79	1.000	23.41	72.05	35.11	2.09
240	113.0	1.9000	2.79	1.000	23.11	71.47	34.61	2.07
250	114.6	1.9000	2.79	1.000	23.26	71.76	34.86	2.08
260	125.8	1.9000	2.79	1.000	24.19	73.64	36.40	2.13
270	120.1	1.9000	2.79	1.000	23.73	72.69	35.65	2.11
280	129.6	1.9000	2.79	1.000	24.49	74.27	36.89	2.15
290	130.9	1.9000	2.79	1.000	24.59	74.47	37.05	2.15
300	135.5	1.9000	2.79	1.000	24.96	75.22	37.63	2.18
310	128.8	1.9000	2.79	1.000	24.42	74.13	36.78	2.14
320	142.5	1.9000	2.79	1.000	25.50	76.31	38.48	2.21
330	126.6	1.9000	2.79	1.000	24.25	73.77	36.50	2.13
340	121.6	1.9000	2.79	1.000	23.86	72.94	35.85	2.11
350	138.0	1.9000	2.79	1.000	25.15	75.61	37.94	2.19

AMSL= 363.7 M