

## AMENDED ENGINEERING STATEMENT

ADX Communications of Pensacola ("ADX") is permittee of WBGP, Pensacola, Florida (BMPH-19990025IC, Facility No. 539). In the instant application, ADX proposes a one-step upgrade of WBGP from Channel 254C2 to Channel 254C1 and a change of transmitter coordinates to 30-27 30 N, 87-26-39 W (NAD 27). For this upgrade, ADX requests processing pursuant to 47 C.F.R. § 73.215 relative to Stations WINL, Linden, Alabama (Facility No. 54538), WTKE, Holt, Florida (Facility No. 56374) and the outstanding construction permit for WFSY (BPH-20010802AAZ), Panama City, Florida (Facility No. 66667).

As seen in Exhibit 24a, the reference point for this proposal is short-spaced to the licensed facilities for Class C Station WFSY. The current WFSY licensed facilities (100 kW, 332 meters HAAT), however, do not meet those required under Section 73.211 of the Commission's current rules for a full Class C facility. Pursuant to Note 4 of Section 73.3573 of the Commission's Rules, a Class C station operating with antenna height above average terrain ("HAAT") of less than 451 meters is subject to reclassification as a Class C0 station upon the filing of a triggering application for construction permit that is short-spaced to such a Class C station under Section 73.207 but would be fully spaced to such a station considered as a Class C0 assignment.

Accordingly, it is requested that this application be treated as a "triggering application" under the Commission's Rules with respect to WFSY. As seen in Exhibit 24a, there are no other available co-channel, adjacent, second adjacent, or third adjacent channels upon which WBGP could operate as a Class C1 facility at the specified antenna location and establish a reference coordinate in full compliance with the distance separation requirements of 47 C.F.R. § 73.207. Due to the positioning of channel 254, the IF-related (+/- 53, 54) channels fall at 200, 201, 307, and 308, and thus are not available for allocation.

A copy of this triggering application is being served upon WFSY, as required by Section 73.3573, Note 4 of the Commission's Rules.

Based upon all of the forgoing, it is respectfully requested that a Show Cause Order be issued immediately, requiring WFSY to Show Cause why WFSY should not be reclassified as a Class C0 station.

Respectfully submitted,

May 24, 2002



Gary O. Keener

