

Exhibit 29 – Statement A  
**NATURE OF THE PROPOSAL**  
 prepared for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW 151.1 m

*CBS Radio Annapolis LLC* (“*CBS Radio*”) is the licensee<sup>1</sup> of WLZL(FM)(Ch. 300B, Annapolis, MD). *CBS Radio* proposes to replace the WLZL antenna on the existing tower<sup>2</sup> while making slight changes in antenna height, antenna pattern, and effective radiated power (“ERP”).

The currently authorized WLZL facility operates with 50 kW (Max-DA) ERP at 152 meters height above average terrain (“HAAT”), the former Class B maximum facilities prior to metrification. Since this combination of power and height exceeds the present maximum Class B facility (50 kW ERP/150 m HAAT) established under §73.211(b), WLZL presently operates as a “grandfathered” facility pursuant to §73.211(c).

The proposed facility will operate with an effective radiated power (“ERP”) of 49 kW (Max-DA) and an antenna HAAT of 151.1 meters. The proposed antenna will be mounted on the existing tower structure. As shown in the attached **Exhibit 29 – Figure 1** coverage contour map, the principal community of Annapolis, Maryland will continue to be encompassed by the proposed 70 dBμ coverage contour.

As detailed in the following table, the proposed facility will remain short spaced to multiple stations. No change in location is proposed herein so no short spacings are exacerbated.

REFERENCE				CLASS = B			DISPLAY DATES	
38 59 45.6 N.				Current Spacings to 3rd Adj.			DATA	09-10-12
76 39 26.1 W.				Channel 300 - 107.9 MHz			SEARCH	09-12-12
Call	Channel	Location		Azi	Dist	FCC	Margin	
WGTY	LIC-D 299B	Gettysburg	PA	345.4	98.76	169.0	-70.2	
WWWT-FM	LIC 299B	Manassas	VA	254.9	106.09	169.0	-62.9	
WRQX	LIC 297B	Washington	DC	262.2	36.96	74.0	-37.0	
WKHI	APP-Z 299B1	Fruitland	MD	121.9	127.72	145.0	-17.3	
WPHI-FM	LIC-Z 300A	Pennsauken	NJ	49.8	166.41	178.0	-11.6	
WBQK	LIC-N 300A	West Point	VA	184.6	172.15	178.0	-5.9	

<sup>1</sup> FCC File Number BMLH-20110708ACE.

<sup>2</sup> See FCC Antenna Structure Registration Number 1036204.

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According to information retrieved from the FCC Media Bureau Reference Room and the FCC's CDBS engineering database, it is understood that the short spacings to WGTY, WWT-FM, and WRQX have existed since 1964 when the minimum distance spacing rules were enacted. Therefore, WLZL operates under the grandfathering provisions of §73.213(a) with respect to first-adjacent stations WGTY and WWT-FM and §73.213(a)(4) with respect to third-adjacent station WRQX. Because §73.213(a)(4) requires no distance separation or interference protection to grandfathered, short spaced, third-adjacent stations, no further allocation study of WRQX is believed necessary.

As depicted in **Exhibit 29 – Figure 2**, there is virtually no difference between the licensed and proposed WLZL contours at locations within the pertinent contours of WGTY and WWT-FM. As a result, areas predicted to receive interference from the proposed facility are located entirely within areas predicted to receive interference from the existing, licensed facility.

Interference areas were predicted using the procedure specified in §73.213(a). The results of these studies are provided in **Exhibit 29 – Figures 3 - 10** and summarized below. As shown, the area and population predicted to receive interference is reduced in all cases. Therefore, it is believed that the proposed facility complies with §73.213(a).

	<b>Licensed WLZL</b>	<b>Proposed WLZL</b>
<b>Interference to WWT</b>	Area: 1,746.85 km <sup>2</sup> Population: 1,286,513 (see <b>Exhibit 29 – Figure 3</b> )	Area: 1,741.30 km <sup>2</sup> Population: 1,282,787 (see <b>Exhibit 29 – Figure 4</b> )
<b>Interference from WWT-FM</b>	Area: 1,754.87 km <sup>2</sup> Population: 1,480,142 (see <b>Exhibit 29 – Figure 5</b> )	Area: 1,746.81 km <sup>2</sup> Population: 1,478,506 (see <b>Exhibit 29 – Figure 6</b> )
<b>Interference to WGTY</b>	Area: 785.21 km <sup>2</sup> Population: 86,251 (see <b>Exhibit 29 – Figure 7</b> )	Area: 783.27 km <sup>2</sup> Population: 86,228 (see <b>Exhibit 29 – Figure 8</b> )
<b>Interference from WGTY</b>	Area: 618.42 km <sup>2</sup> Population: 185,383 (see <b>Exhibit 29 – Figure 9</b> )	Area: 615.70 km <sup>2</sup> Population: 183,853 (see <b>Exhibit 29 – Figure 10</b> )

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The remaining shortspaced facilities (WKHI, WPHI-FM, and WBQK), each requested processing under the FCC's Contour Protection Rule, §73.215.<sup>3</sup> Each facility provides interference protection to a hypothetical WLZL maximum Class B facility located at the licensed WLZL coordinates. Because the proposed WLZL facility will operate as a maximum Class B facility at the licensed site, it is believed that no further study of these facilities is required.

Pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The contours were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to the principal community contours were then used with a GIS mapping program to generate the attached maps.

The WLZL transmitter site is located at Crofton Maryland near the Chesapeake Bay and its many tributaries. For greater accuracy in this area of irregular terrain, 36 evenly spaced radials were utilized in lieu of the eight standard radials to develop the resulting antenna HAAT. U.S.G.S. 3 arc-second digitized terrain data, provided in **Exhibit 29 - Table 1**, was employed in the determination of average terrain elevations. Established Commission policy encourages the use of additional evenly spaced radials where increased accuracy is desirable.

The proposed site is located more than 800 km from both the Canadian and Mexican borders, well beyond the coordination distances with either country. The nearest FCC monitoring station is 23.5 km distant at Laurel, Maryland. Because WLZL has operated at this site for many years and the proposed pattern toward the monitoring station will remain virtually the same as presently licensed, it is believed that coordination with the monitoring station is unnecessary. With respect to AM stations, according to information extracted from the

<sup>3</sup> See BPH-20120723AEM for WKHI; BPH-20041207ABT for WPHI-FM; and BPH-20050427ABM for WBQK.

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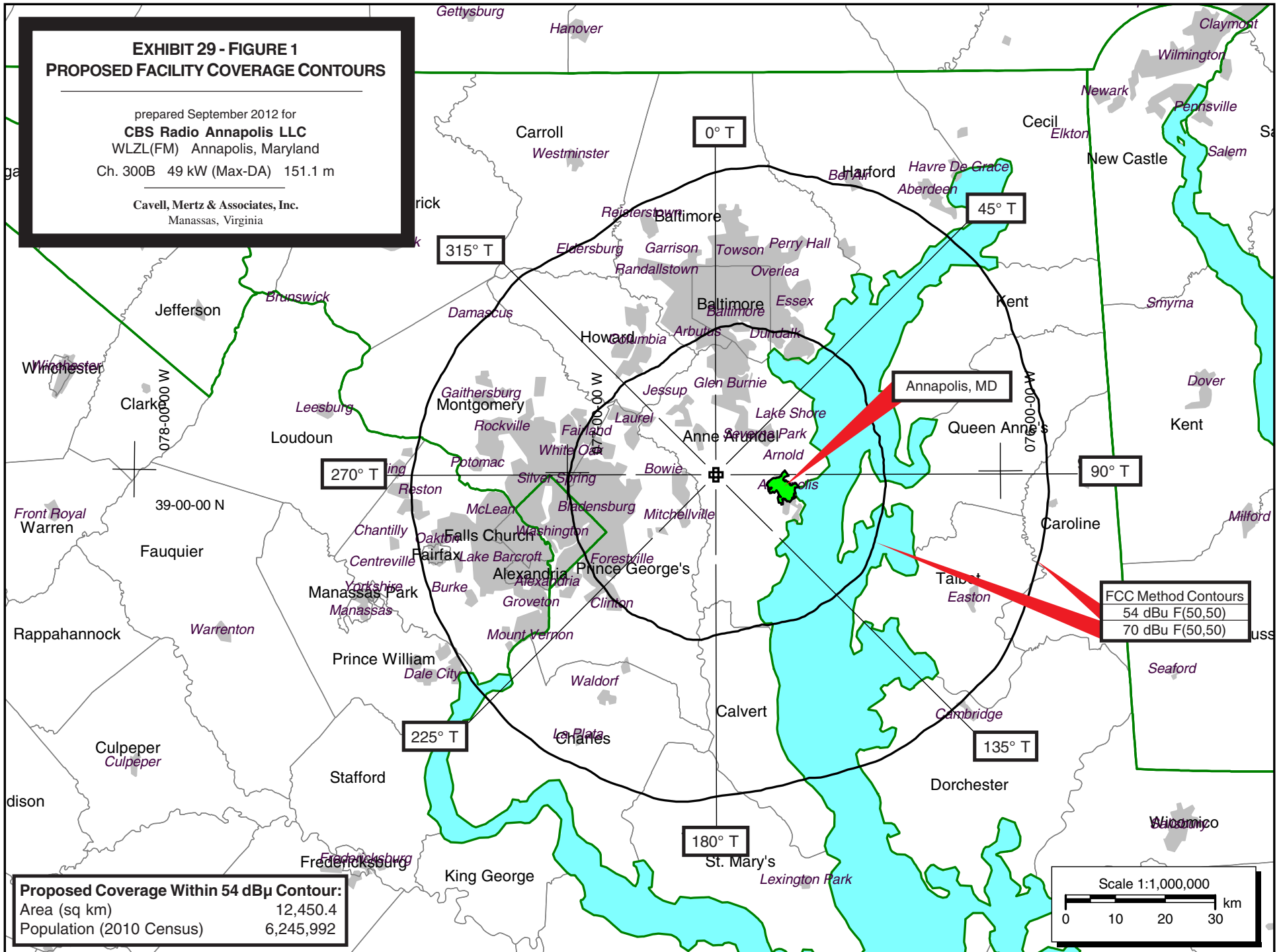
Commission's Media Bureau database, there are no non-directional facilities within 0.8 km and no directional facilities within 3.2 km of the proposed site.

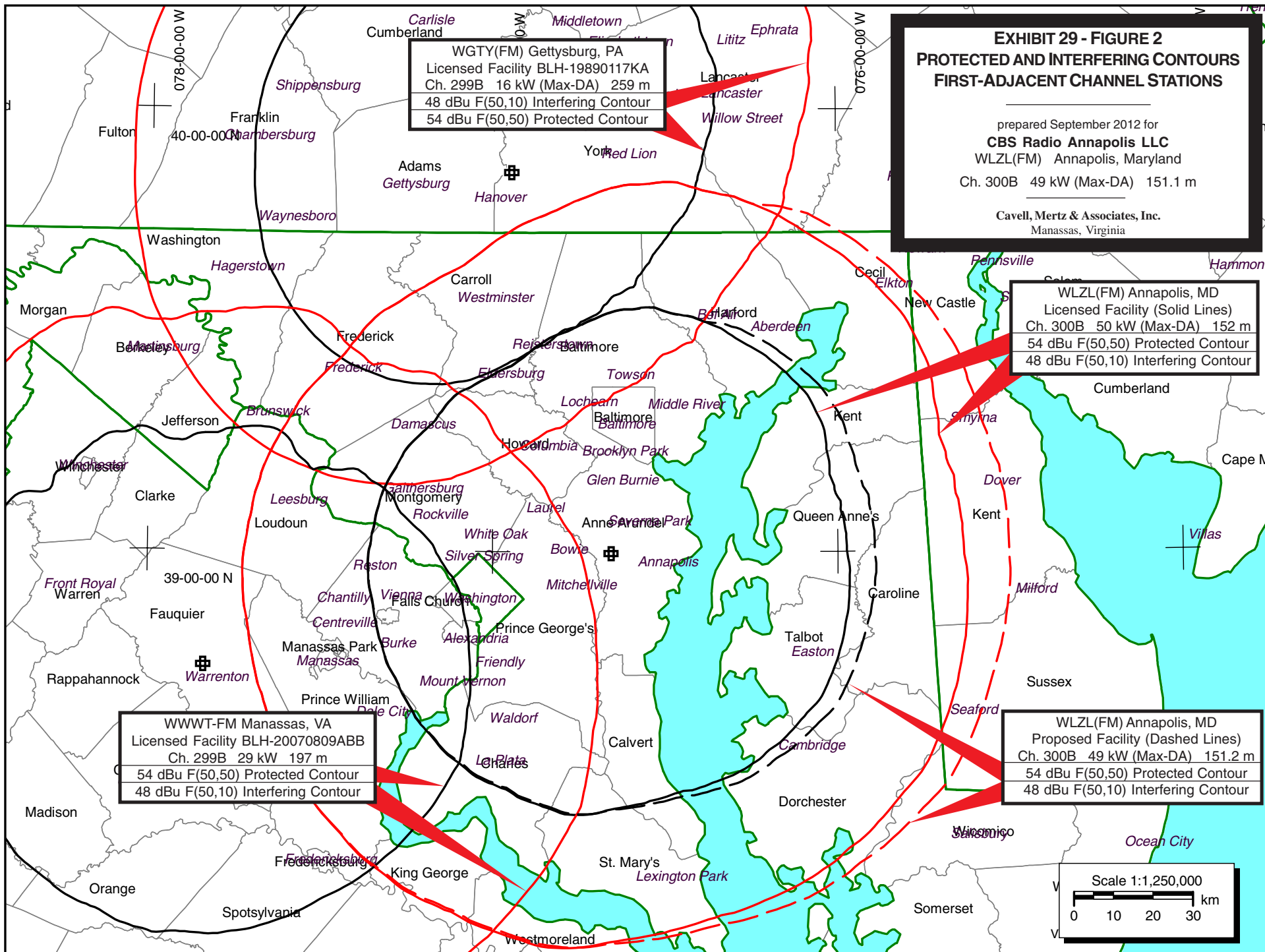
It is therefore believed that the proposed facility satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

# **EXHIBIT 29 - FIGURE 1** **PROPOSED FACILITY COVERAGE CONTOURS**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia





# **EXHIBIT 29 - FIGURE 3** **WWWT-FM PREDICTED INTERFERENCE** **FROM LICENSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

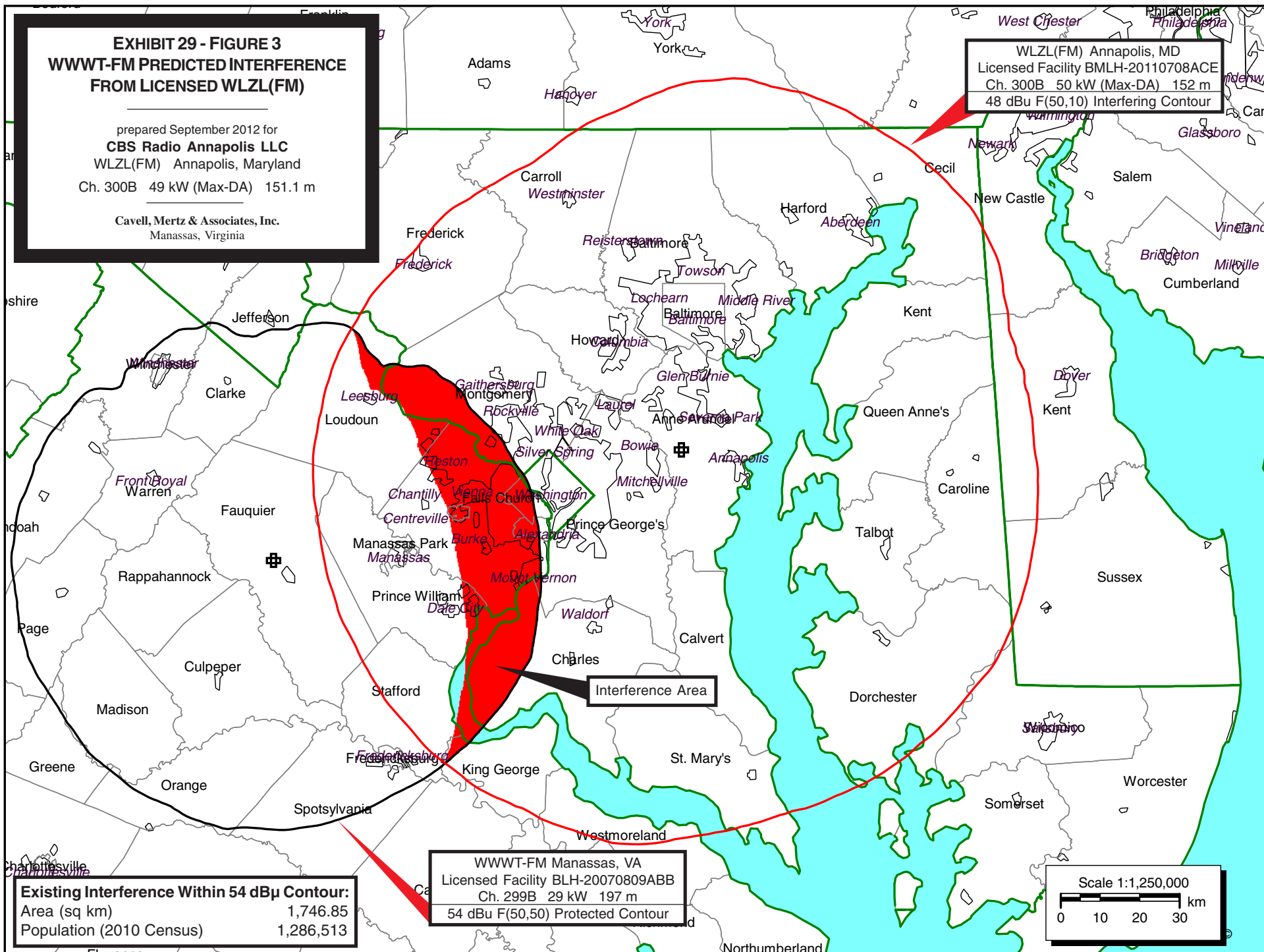
Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

WLZL(FM) Annapolis, MD  
 Licensed Facility BMLH-20110708ACE  
 Ch. 300B 50 kW (Max-DA) 152 m  
 48 dBu F(50,10) Interfering Contour

WWWT-FM Manassas, VA  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**Existing Interference Within 54 dBu Contour:**  
 Area (sq km) 1,746.85  
 Population (2010 Census) 1,286,513

Scale 1:1,250,000  
 0 10 20 30 km





**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

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 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

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 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
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 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

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**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

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**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
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 Ch. 300B 49 kW (Max-DA) 151.2 m  
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**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km

**EXHIBIT 29 - FIGURE 4**  
**WWWT-FM PREDICTED INTERFERENCE**  
**FROM PROPOSED WLZL(FM)**

prepared September 2012 for  
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 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

**Proposed Interference Within 54 dBu Contour:**

Area (sq km)	1,741.30
Population (2010 Census)	1,282,787

**WWWT-FM Manassas, VA**  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 54 dBu F(50,50) Protected Contour

**WLZL(FM) Annapolis, MD**  
 Proposed Facility  
 Ch. 300B 49 kW (Max-DA) 151.2 m  
 48 dBu F(50,10) Protected Contour

**Interference Area**

**Scale 1:1,250,000**  
 0 10 20 30 km



# **EXHIBIT 29 - FIGURE 5** **WWWT-FM PREDICTED INTERFERENCE** **TO LICENSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

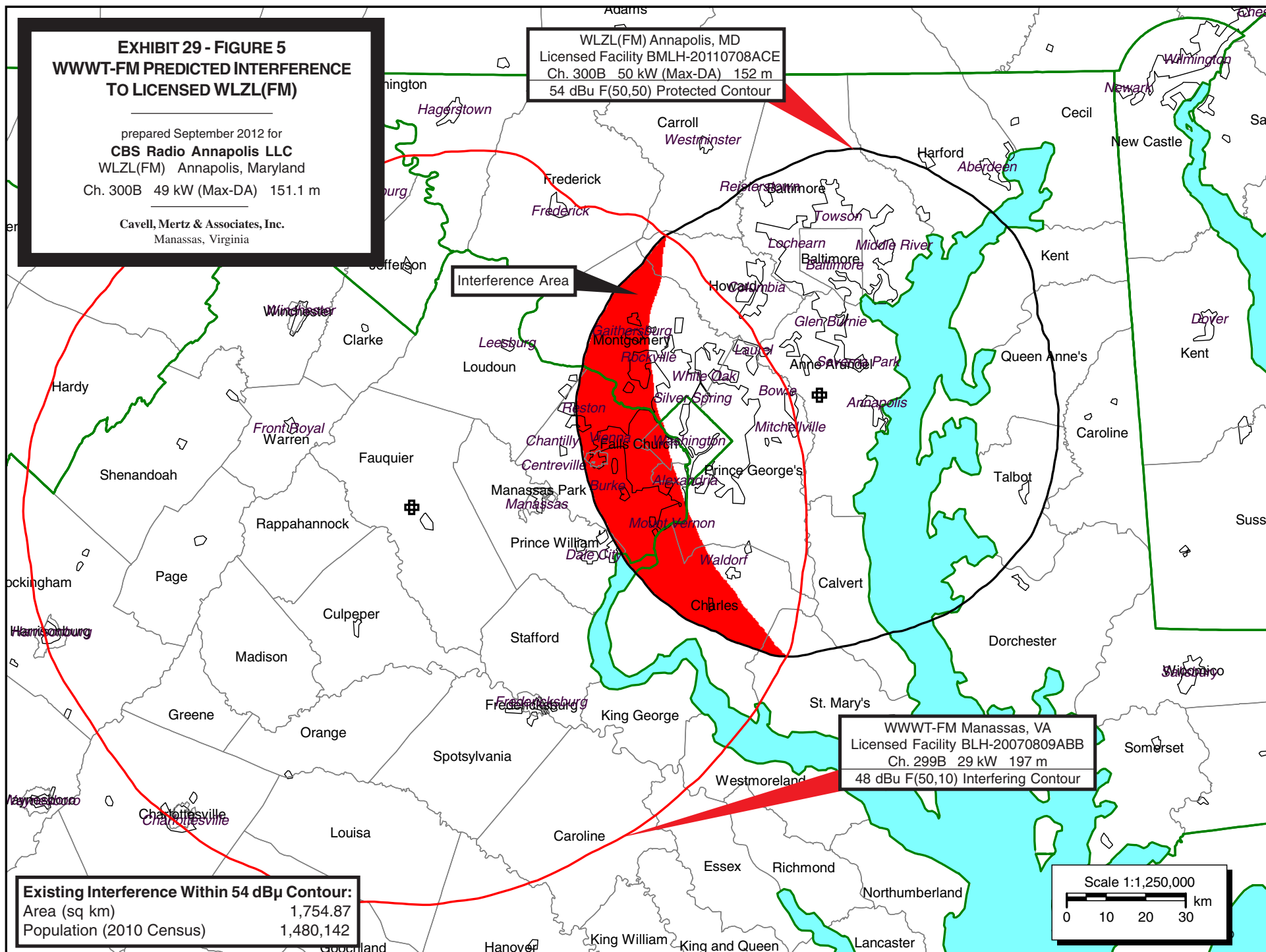
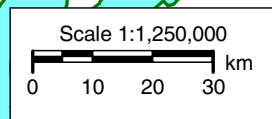
Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

WLZL(FM) Annapolis, MD  
 Licensed Facility BMLH-20110708ACE  
 Ch. 300B 50 kW (Max-DA) 152 m  
 54 dBu F(50,50) Protected Contour

Interference Area

WWWT-FM Manassas, VA  
 Licensed Facility BLH-20070809ABB  
 Ch. 299B 29 kW 197 m  
 48 dBu F(50,10) Interfering Contour

**Existing Interference Within 54 dBu Contour:**  
 Area (sq km) 1,754.87  
 Population (2010 Census) 1,480,142



**EXHIBIT 29 - FIGURE 6**  
**WWWT-FM PREDICTED INTERFERENCE**  
**TO PROPOSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
WLZL(FM) Annapolis, Maryland  
Ch. 300B 49 kW (Max-DA) 151.1 m

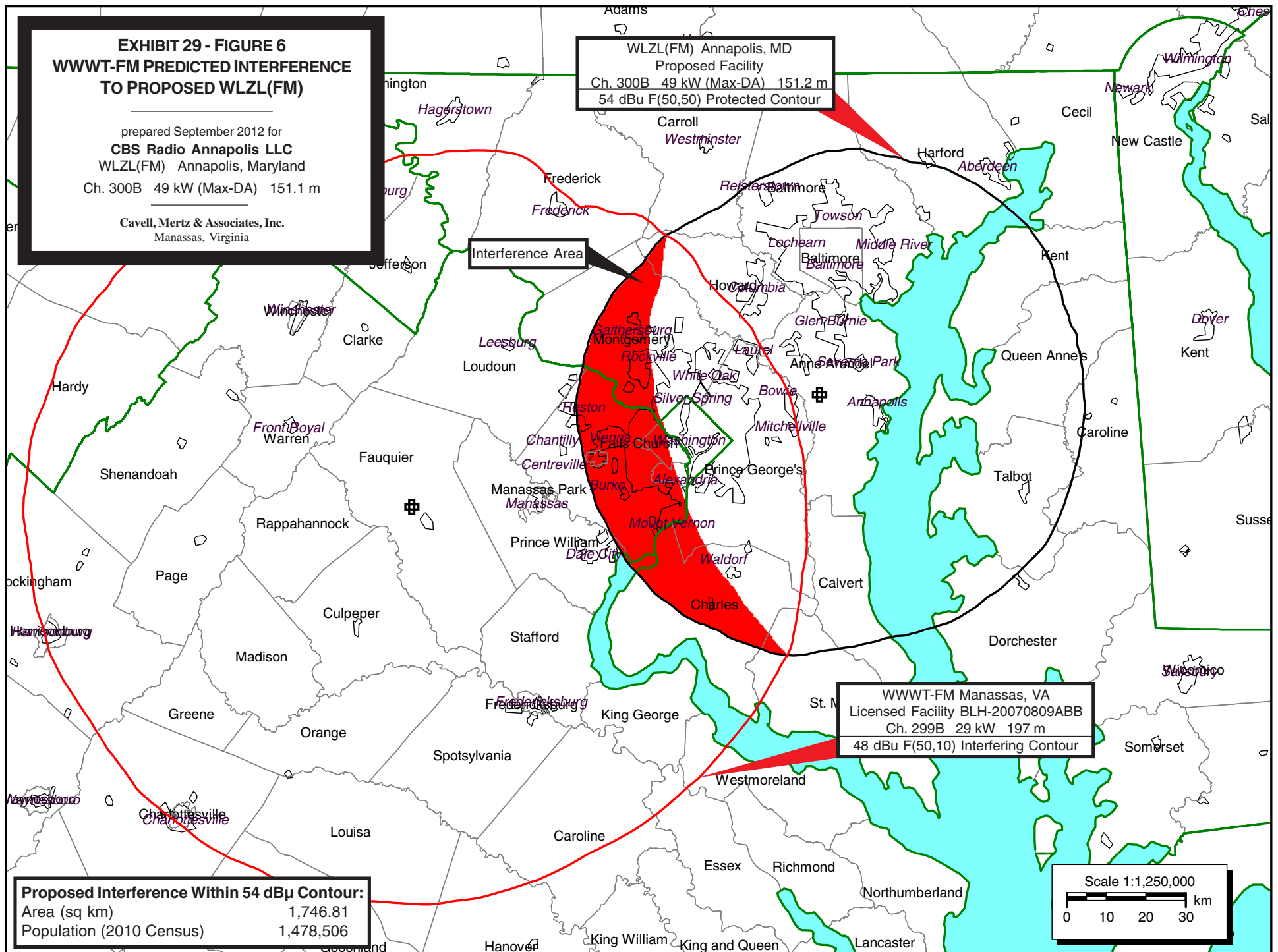
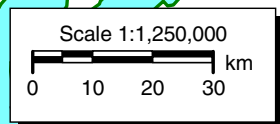
Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

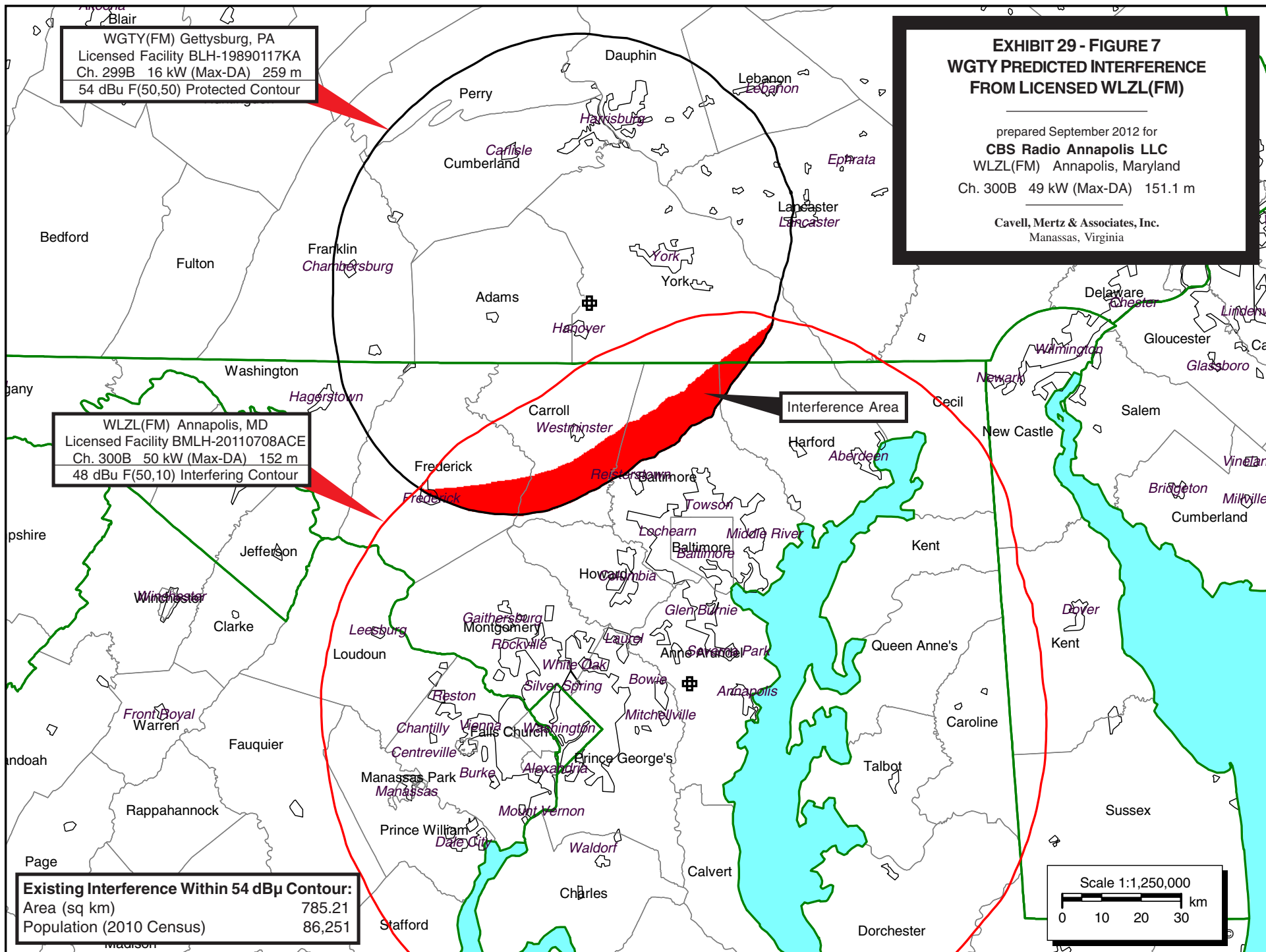
WLZL(FM) Annapolis, MD  
Proposed Facility  
Ch. 300B 49 kW (Max-DA) 151.2 m  
54 dBu F(50,50) Protected Contour

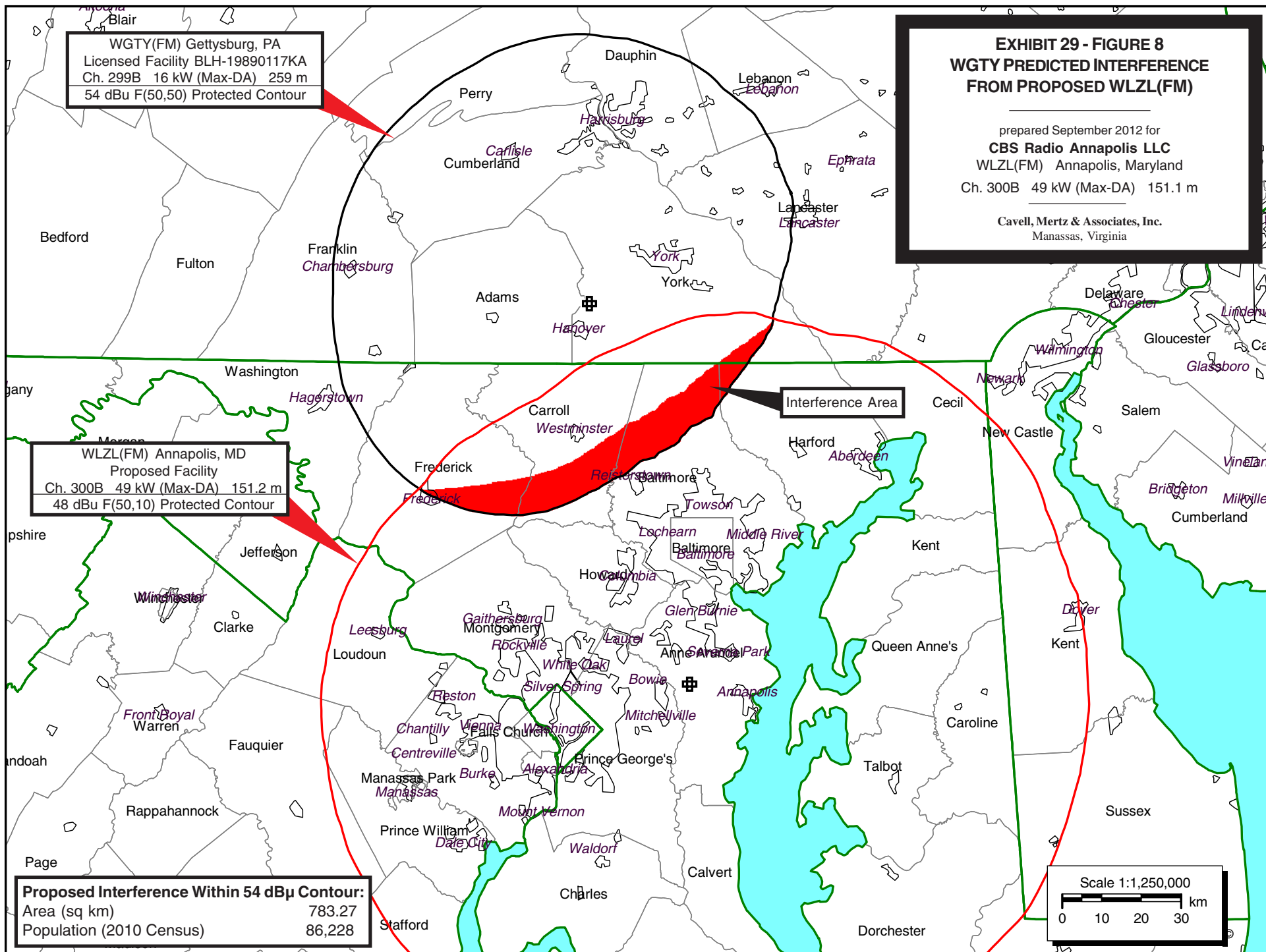
Interference Area

WWWT-FM Manassas, VA  
Licensed Facility BLH-20070809ABB  
Ch. 299B 29 kW 197 m  
48 dBu F(50,10) Interfering Contour

**Proposed Interference Within 54 dBu Contour:**  
Area (sq km) 1,746.81  
Population (2010 Census) 1,478,506









# **EXHIBIT 29 - FIGURE 9** **WGTY PREDICTED INTERFERENCE** **TO LICENSED WLZL(FM)**

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW (Max-DA) 151.1 m

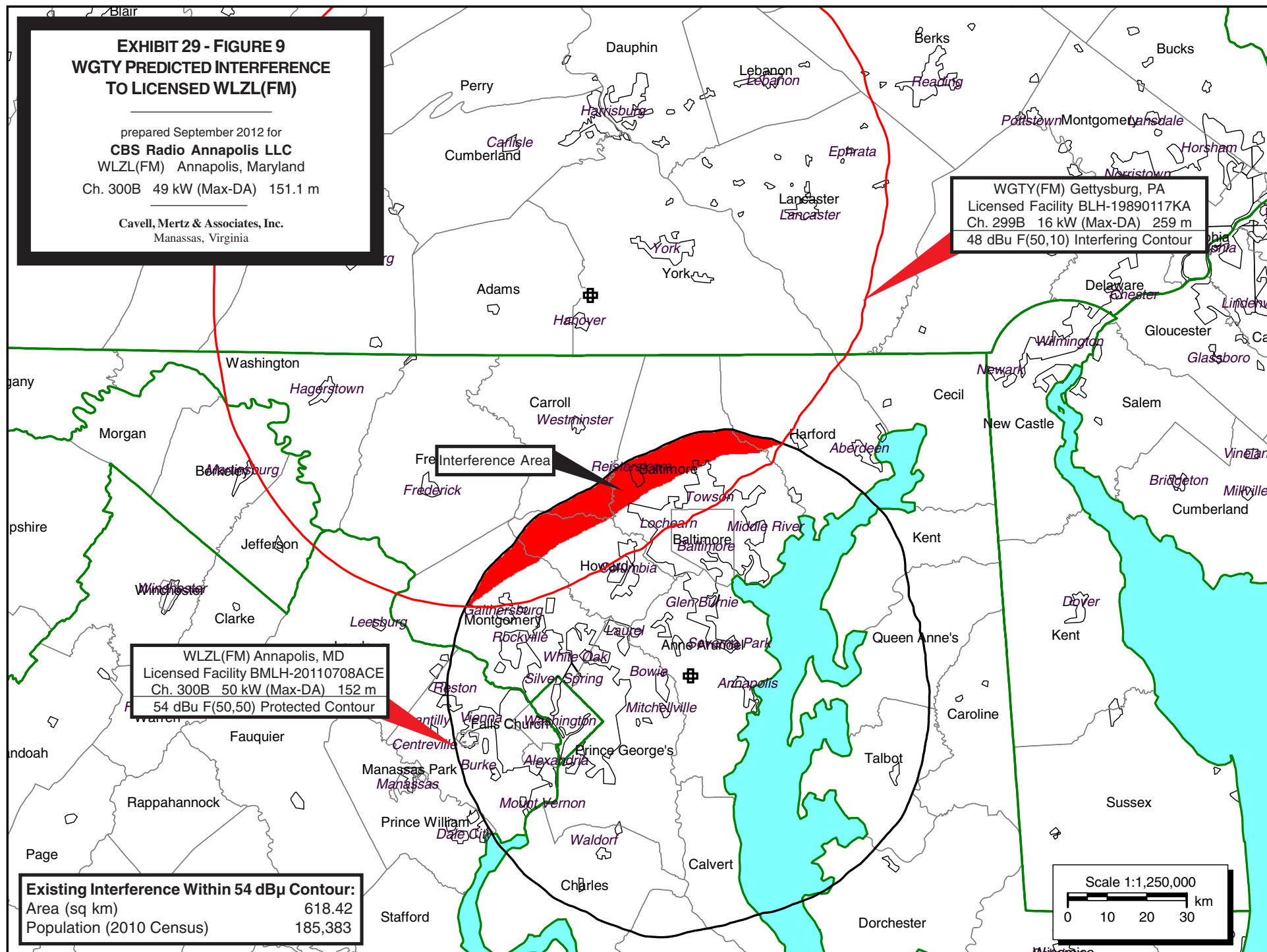
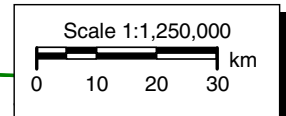
Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

WGTY(FM) Gettysburg, PA  
 Licensed Facility BLH-19890117KA  
 Ch. 299B 16 kW (Max-DA) 259 m  
 48 dBu F(50,10) Interfering Contour

WLZL(FM) Annapolis, MD  
 Licensed Facility BMLH-20110708ACE  
 Ch. 300B 50 kW (Max-DA) 152 m  
 54 dBu F(50,50) Protected Contour

**Existing Interference Within 54 dBu Contour:**

Area (sq km)	618.42
Population (2010 Census)	185,383



# EXHIBIT 29 - FIGURE 10 WGTY PREDICTED INTERFERENCE TO PROPOSED WLZL(FM)

prepared September 2012 for  
**CBS Radio Annapolis LLC**  
WLZL(FM) Annapolis, Maryland  
Ch. 300B 49 kW (Max-DA) 151.1 m

Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

WGTY(FM) Gettysburg, PA  
Licensed Facility BLH-19890117KA  
Ch. 299B 16 kW (Max-DA) 259 m  
48 dBu F(50,10) Interfering Contour

WLZL(FM) Annapolis, MD  
Proposed Facility  
Ch. 300B 49 kW (Max-DA) 151.2 m  
54 dBu F(50,50) Protected Contour

**Proposed Interference Within 54 dBu Contour:**  
Area (sq km) 615.70  
Population (2010 Census) 183,853

Interference Area

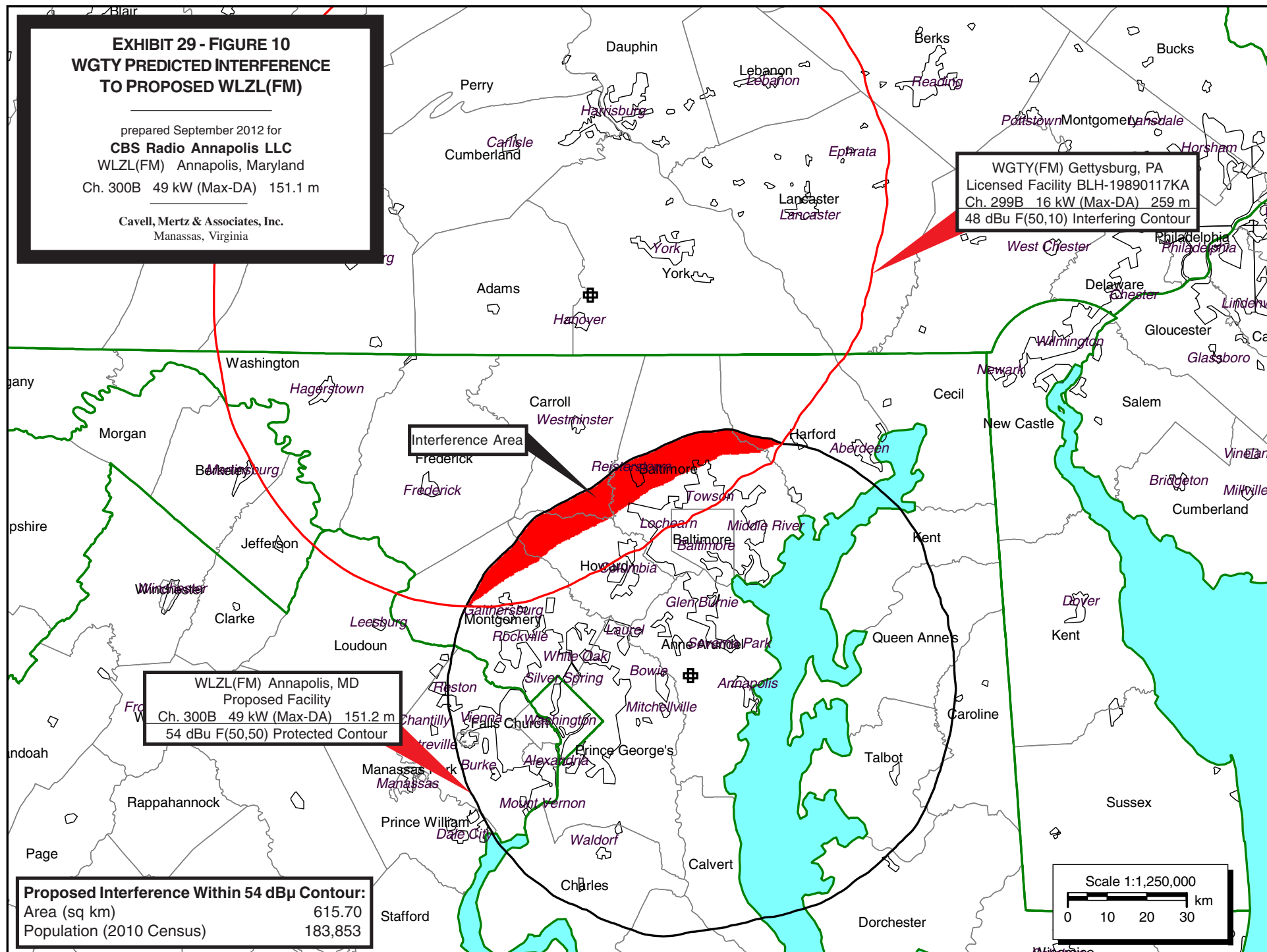
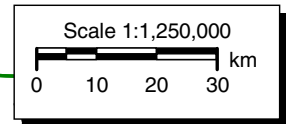


Exhibit 29 - Table 1  
**ANTENNA HEIGHT ABOVE AVERAGE TERRAIN**

prepared for  
**CBS Radio Annapolis LLC**  
 WLZL(FM) Annapolis, Maryland  
 Ch. 300B 49 kW 151.1 m

Antenna C/R AMSL: 180.4 m  
 38° 59' 46" North Latitude  
 76° 39' 26" West Longitude  
 (NAD27)

Azimuth	Average	Antenna	Azimuth	Average	Antenna
(°T)	Elevation	Effective	(°T)	Elevation	Effective
	(m AMSL)	Height		(m AMSL)	Height
		(m)			(m)
0	34.8	145.6	190	21.7	158.7
10	27.5	152.9	200	28.9	151.5
20	27.1	153.3	210	30.1	150.3
30	29.1	151.3	220	31.3	149.1
40	21.8	158.6	230	35.4	145.0
50	12.4	168.0	240	41.6	138.8
60	13.2	167.2	250	41.2	139.2
70	26.9	153.5	260	39.5	140.9
80	21.8	158.6	270	35.8	144.6
90	19.0	161.4	280	37.3	143.1
100	15.8	164.6	290	33.9	146.5
110	13.6	166.8	300	33.8	146.6
120	6.3	174.1	310	33.7	146.7
130	11.8	168.6	320	40.4	140.0
140	20.2	160.2	330	48.2	132.2
150	22.7	157.7	340	44.6	135.8
160	34.8	145.6	350	43.8	136.6
170	39.3	141.1			
180	33.8	146.6	Average:	29.3	151.1