

MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
WRKI (FM) RADIO STATION
CH 236B - 95.1 MHZ - 29.5 KW
BROOKFIELD, CONNECTICUT
August 2008

EXHIBIT A

Grandfathered Shortspace Review §73.213(a) and §73.213(c)

This application seeks to correct the coordinates of WRKI, Channel 236B, Brookfield, Connecticut, and alter the directional antenna pattern of the station. As indicated on Exhibit A1, Channel 236B, at the licensed WRKI site at Brookfield, Connecticut, 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 following stations: WZZO, Channel 236B, Bethlehem, Pennsylvania; WKSS, Channel 239B, Hartford-Meridian, Connecticut; and WHFM, Channel 237A, Southampton, New York.

§73.213(a) Review

Channel 236B commenced operation in Brookfield, Connecticut prior to November 16, 1964. Additionally, the channels for shortspaced stations, WZZO and WKSS, are also pre-1964 assignments.¹ Based on the review, WRKI is a pre-1964 grandfathered shortspaced station with respect to WZZO and WKSS pursuant to §73.213(a) of the rules. As indicated in §73.213(a)(4), there is no minimum distance or interference protection requirements for second or third adjacent

1) According to data reviewed, WRKI commenced operation in 1957; WZZO in 1946 and WKSS in 1947. Therefore, §73.213(a) applies to each of these shortages.

channels, which have remained continuously shortspaced since 1964. As such, WKSS is not addressed further in this instant application. Therefore, WRKI can operate with a full 50.0 kilowatts at 150 meters, or its equivalent, towards WKSS.

The proposed correction to the WRKI site will relocate the station, on paper, 0.02 kilometer (170 feet) west of its licensed location. As such, the distance to the remaining 1964 grandfathered shortspaced station, WZZO, will be changed slightly. As indicated on Exhibit A2, from the corrected location, WRKI will be moved 0.02 kilometer closer to WZZO. The distance between the stations remains 184.0 kilometers, when rounded to the nearest kilometer.

As indicated on Exhibits A3 and A4, the presently licensed WRKI protected and interfering contours remain in the same location, with respect to the protected and interfering contours of WZZO (Exhibit A5). Therefore, there is no change in interference delivered or received as a result of this correction. Therefore, it is believed that this proposal is in compliance with §73.213(a) of the rules.

§73.213 (c) Review

The shortage to WHFM was created when the Commission changed the minimum distance separation requirements for Class A stations to accommodate the increase of power from 3.0 kilowatts to 6.0 kilowatts in MM Docket #88-375.² Therefore, any relocation or change for WRKI is based on the former 3.0 kilowatt spacing rules, contained in §73.213(c) of the rules. A

2) WHFM was originally authorized in 1971.

Class B station operating on a first adjacent channel from a Class A station must be located 105.0 kilometers from that facility. As noted on Exhibit A1, the licensed WRKI site is 107.14 kilometers from WHFM. The correction in coordinates places WRKI some 107.16 kilometers from WHFM. Therefore, this correction for WRKI is compliant with §73.213(c) of the rules.³

3) WHFM filed an application to increase power to the equivalent of 6.0 kilowatts, but limited power towards WRKI to the equivalent of 3.0 kilowatts at 100.0 meters.

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EXHIBIT A1

Clearance Study for WRKI Brookfield, Connecticut
Using Licensed Coordinates as Reference

REFERENCE		CLASS = B	DISPLAY DATES
41 29 36.0 N.			DATA 08-12-08
73 25 45.0 W.	Current	Spacings to 3rd Adj.	SEARCH 08-12-08
----- Channel 236 - 95.1 MHz -----			

Call	Channel	Location	Ant	Azi	Dist	FCC	Margin
Lat.	Lng.			Power	HAAT		
WRKI	LIC-D 236B	Brookfield	CT	0.0	0.00	241.0	-241.00
	41 29 36.0	73 25 45.0	DC	29.500 kW		194 M	
	Cumulus Licensing LLC			BLH-19960111KB			
* WZZO	LIC-D 236B	Bethlehem	PA	238.8	184.29	241.0	-56.71
	40 37 13.0	75 17 37.0	DCN	30.000 kW		192 M	
	Capstar TX Limited Partnership			BLH-19890830KD			
* WKSS	LIC-D 239B	Hartford-Meriden	CT	81.0	49.40	74.0	-24.60
	41 33 41.0	72 50 39.0	DCN	16.500 kW		268 M	
	Capstar TX Limited Partnership			BMLH-19980820KA			
* WHFM	LIC-Z 237A	Southampton	NY	125.1	107.14	113.0	-5.86
	40 56 05.0	72 23 15.0	ZCN	5.000 kW		108 M	
	Cox Radio, Inc.			BLH-19911211KA			
WAYV	LIC-D 236B	Atlantic City	NJ	200.5	250.07	241.0	9.07
	39 22 51.0	74 27 03.0	DC	50.000 kW		101 M	
	Equity Communications, L.P.			BMLH-20011108AAC			
WVTQ	LIC-N 236A	Sunderland	VT	7.7	187.57	178.0	9.57
	43 09 58.0	73 07 02.0	NC	0.096 kW		731 M	
	Vermont Public Radio			BMLED-20060526AHS			
VAC	VAC 235A	Montauk	NY	113.5	130.95	113.0	17.95
	41 01 00.0	72 00 00.0	N	6.000 kW		100 M	
WPLJ	LIC 238B	New York	NY	209.6	95.04	74.0	21.04
	40 44 54.0	73 59 10.0	CX	6.700 kW		408 M	
	Radio License Holding IX			BMLH-20050216ACG			
WMAS-FM	LIC 234B	Springfield	MA	44.4	96.35	74.0	22.35
	42 06 32.0	72 36 44.0	CN	50.000 kW		59 M	
	Citadel Broadcasting Company			BLH-19801010AD			
WXTK	LIC-Z 236B	West Yarmouth	MA	85.5	266.91	241.0	25.91
	41 38 08.0	70 14 06.0	ZCN	50.000 kW		80 M	
	Qantum Of Cape Cod License			BLH-19970929KC			
WHCN	LIC-D 290B	Hartford	CT	80.7	49.36	20.0	29.36
	41 33 47.0	72 50 42.0	DCN	16.000 kW		264 M	
	Capstar TX Limited Partnership			BLH-19890323KA			

* Note : See Exhibit A for discussions of shortspaces.

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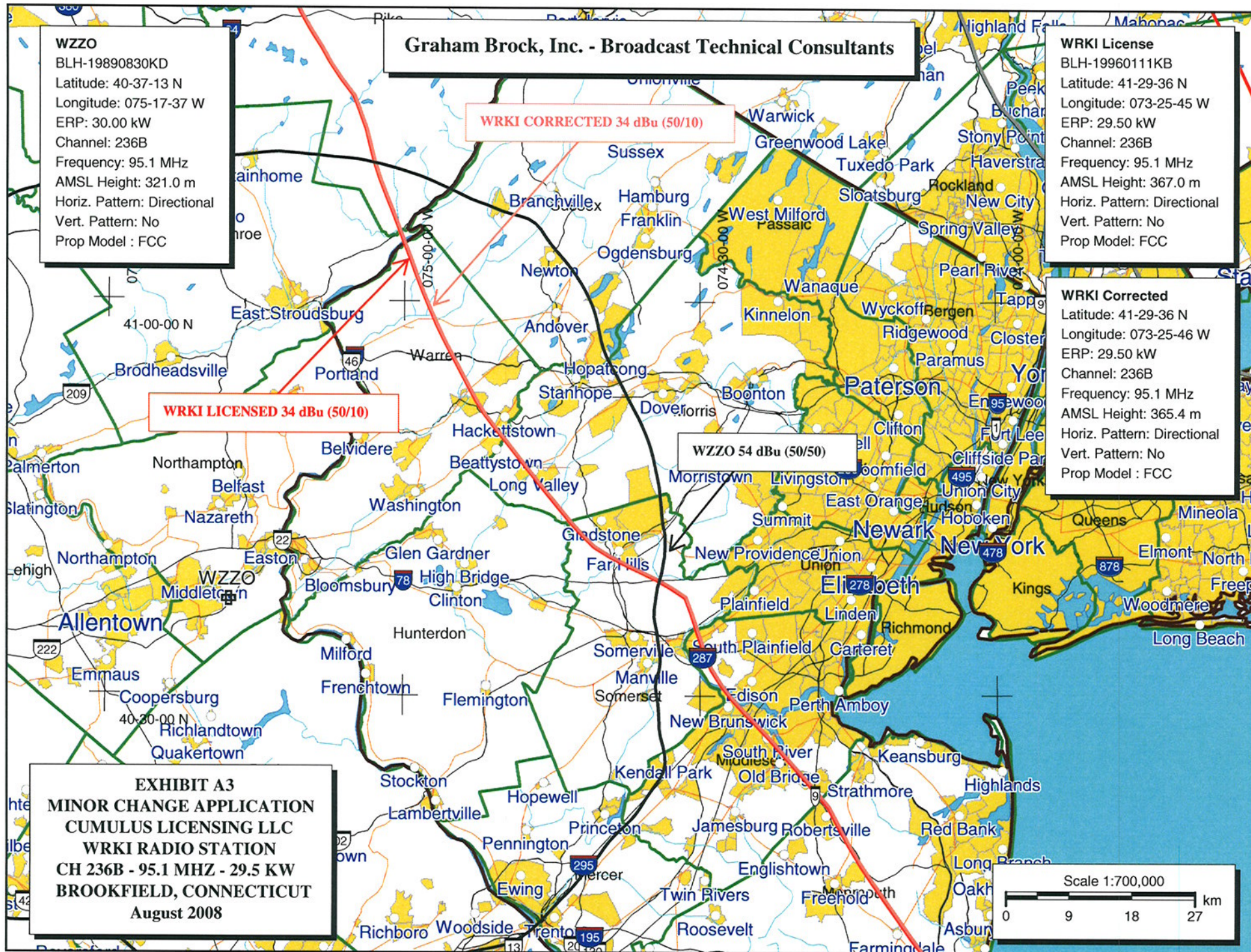
EXHIBIT A2

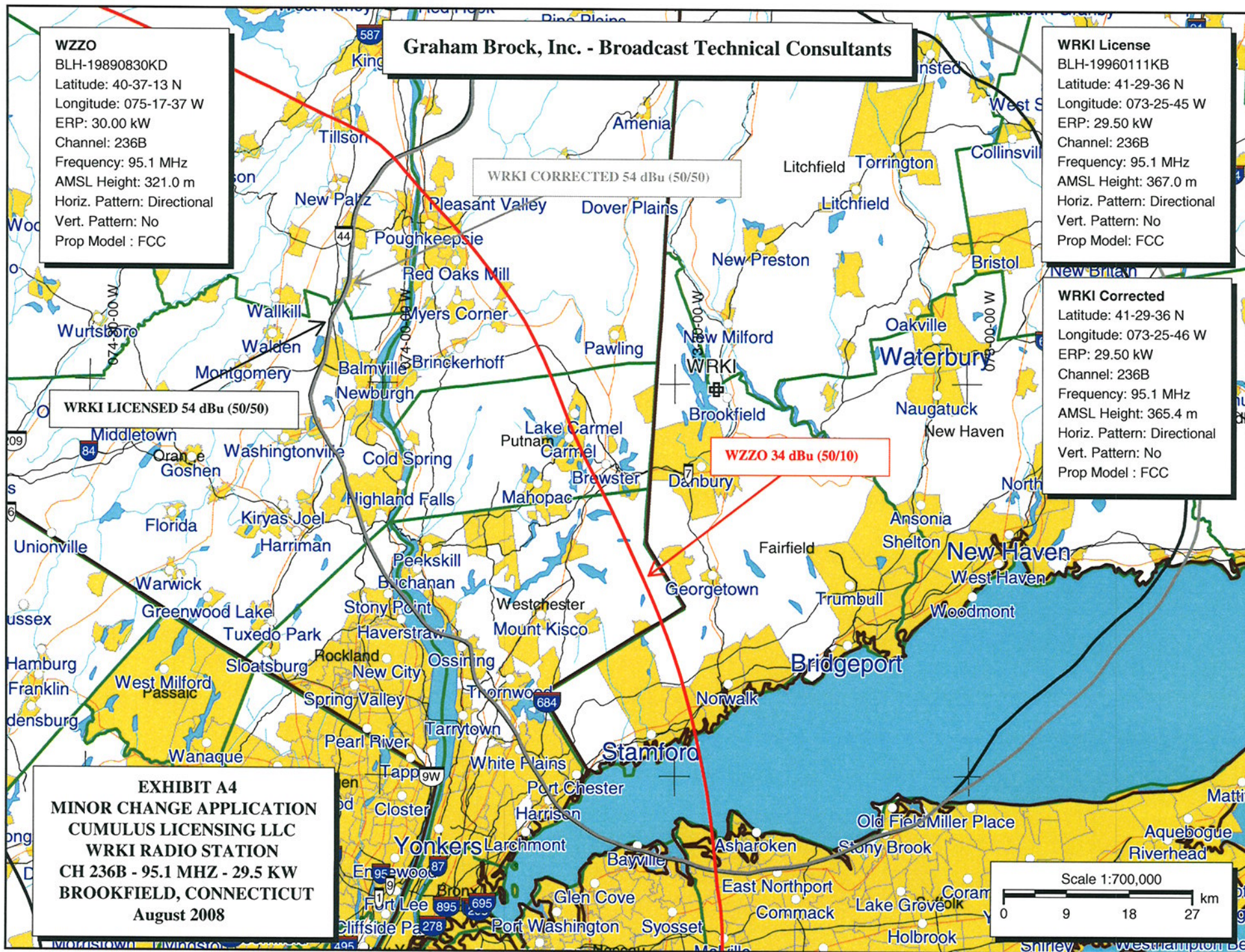
Clearance study for WRKI Brookfield, Connecticut
Using Actual Tower Location as Reference

REFERENCE	CLASS = B	DISPLAY DATES
41 29 36.0 N.		DATA 08-12-08
73 25 46.0 W.	Current Spacings to 3rd Adj.	SEARCH 08-12-08
----- Channel 236 - 95.1 MHz -----		

Call	Channel	Location	Ant	Azi	Dist	FCC	Margin
Lat.	Lng.			Power	HAAT		
WRKI	LIC-D 236B	Brookfield	CT	90.0	0.02	241.0	-240.98
	41 29 36.0	73 25 45.0	DC	29.500 kW	194 M		
	Cumulus Licensing LLC			BLH-19960111KB			
* WZZO	LIC-D 236B	Bethlehem	PA	238.8	184.27	241.0	-56.73
	40 37 13.0	75 17 37.0	DCN	30.000 kW	192 M		
	Capstar TX Limited Partnership			BLH-19890830KD			
* WKSS	LIC-D 239B	Hartford-Meriden	CT	81.0	49.43	74.0	-24.57
	41 33 41.0	72 50 39.0	DCN	16.500 kW	268 M		
	Capstar TX Limited Partnership			BMLH-19980820KA			
* WHFM	LIC-Z 237A	Southampton	NY	125.1	107.16	113.0	-5.84
	40 56 05.0	72 23 15.0	ZCN	5.000 kW	108 M		
	Cox Radio, Inc.			BLH-19911211KA			
WAYV	LIC-D 236B	Atlantic City	NJ	200.5	250.07	241.0	9.07
	39 22 51.0	74 27 03.0	DC	50.000 kW	101 M		
	Equity Communications, L.P.			BMLH-20011108AAC			
WVTQ	LIC-N 236A	Sunderland	VT	7.8	187.58	178.0	9.58
	43 09 58.0	73 07 02.0	NC	0.096 kW	731 M		
	Vermont Public Radio			BMLD-20060526AHS			
VAC	VAC 235A	Montauk	NY	113.4	130.97	113.0	17.97
	41 01 00.0	72 00 00.0	N	6.000 kW	100 M		
WPLJ	LIC 238B	New York	NY	209.6	95.03	74.0	21.03
	40 44 54.0	73 59 10.0	CX	6.700 kW	408 M		
	Radio License Holding IX			BMLH-20050216ACG			
WMAS-FM	LIC 234B	Springfield	MA	44.4	96.37	74.0	22.37
	42 06 32.0	72 36 44.0	CN	50.000 kW	59 M		
	Citadel Broadcasting Company			BLH-19801010AD			
WXTK	LIC-Z 236B	West Yarmouth	MA	85.5	266.93	241.0	25.93
	41 38 08.0	70 14 06.0	ZCN	50.000 kW	80 M		
	Qantum Of Cape Cod License			BLH-19970929KC			
WHCN	LIC-D 290B	Hartford	CT	80.8	49.38	20.0	29.38
	41 33 47.0	72 50 42.0	DCN	16.000 kW	264 M		
	Capstar TX Limited Partnership			BLH-19890323KA			

* Note : See Exhibit A for discussions of shortspacings.





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EXHIBIT A5

Predicted contour:

N. Lat. = 41 29 36.0 - Tabulated Protected and Interfering Contour Data

W. Lng. = 73 25 46.0 - WRKI Radio station - Brookfield, Connecticut

HAAT and Distance to Contour - FCC Method - NGDC 30 Second terrain database

Azi.	HAAT	ERP kW	dBk	Field	54-F5	34-F1
000	259.6	29.5000	14.70	1.000	70.62	172.28
010	266.1	29.5000	14.70	1.000	71.18	172.88
020	181.2	29.5000	14.70	1.000	63.55	163.53
030	189.9	29.5000	14.70	1.000	64.38	164.59
040	184.8	29.5000	14.70	1.000	63.89	163.97
050	190.0	29.5000	14.70	1.000	64.39	164.59
060	183.3	29.5000	14.70	1.000	63.74	163.78
070	198.3	29.5000	14.70	1.000	65.19	165.59
080	214.0	29.5000	14.70	1.000	66.67	167.41
090	232.6	29.5000	14.70	1.000	68.35	169.51
100	255.1	29.5000	14.70	1.000	70.24	171.86
110	266.6	29.5000	14.70	1.000	71.23	172.93
120	236.5	29.5000	14.70	1.000	68.69	169.93
130	221.5	29.5000	14.70	1.000	67.36	168.26
140	215.3	29.5000	14.70	1.000	66.79	167.56
150	214.7	29.5000	14.70	1.000	66.73	167.49
160	220.8	29.5000	14.70	1.000	67.30	168.19
170	234.5	29.5000	14.70	1.000	68.51	169.71
180	229.9	29.5000	14.70	1.000	68.12	169.21
190	209.2	29.5000	14.70	1.000	66.22	166.86
200	206.9	23.3145	13.68	0.889	63.74	160.79
210	173.4	15.0811	11.78	0.715	56.60	145.10
220	164.4	11.8951	10.75	0.635	53.50	138.45
230	162.4	11.6343	10.66	0.628	53.07	137.69
240	166.6	12.2727	10.89	0.645	54.03	139.44
250	166.5	12.2727	10.89	0.645	54.02	139.43
260	168.1	13.0456	11.15	0.665	54.74	141.02
270	158.9	20.1759	13.05	0.827	57.60	150.36
280	120.3	29.5000	14.70	1.000	55.75	154.15
290	117.7	29.5000	14.70	1.000	55.36	153.70
300	127.5	29.5000	14.70	1.000	56.79	155.38
310	107.3	29.5000	14.70	1.000	53.64	151.83
320	110.2	29.5000	14.70	1.000	54.14	152.35
330	197.2	29.5000	14.70	1.000	65.08	165.46
340	176.1	29.5000	14.70	1.000	63.03	162.88
350	231.4	29.5000	14.70	1.000	68.25	169.37

AMSL= 365.4 M