

**MINOR CHANGE APPLICATION**  
**CUMULUS LICENSING LLC**  
**WRQQ (FM) RADIO STATION**  
**CH 246C2 - 97.1 MHZ - 45.0 KW**  
**BELLE MEADE, TENNESSEE**  
**August 2007**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WRQQ, Channel 246C2, Goodlettsville, Tennessee. In MB Docket # 06-77, the community of license of WRQQ was changed to Belle Meade, Tennessee. Cumulus herein submits a minor change application to implement the change of community. Aside from the community of license change, no other change is proposed.

Cumulus is proposing to keep WRQQ at its licensed site; therefore, the FAA has not been apprised of this proposal. The tower on which the antenna is installed has been registered with the Commission and assigned Antenna Structure Registration 1202231. At the site proposed in this application, there is a shortage to one other FM station, WXCM, Whitesville, Kentucky (see Exhibit A). The shortage was created by WXCM's use of §73.215 of the rules, protecting WRQQ as a maximum Class C2 facility. Further, the allocation site for Channel 246C2 at Belle Meade, Tennessee is the licensed WRQQ site. Therefore, WRQQ is assumed to meet §73.207 spacing and specifically does **not** request §73.215 processing.

The operating WRQQ antenna system is located on a relatively short tower, as such, it was not possible to use the worksheets associated with FCC Form 301 to show compliance with

he radio frequency exposure limits. Therefore, attached as Exhibit B is a study showing that the WRQQ facility is in compliance with the Commission's rules. It is also noted that the existing WRQQ site is located within 3.2 kilometers from directional AM station WLAC, 1510 kHz, Nashville, Tennessee. Since Cumulus is proposing only to change the community of license of WRQQ, with no changes to the technical facility nor to the tower, WLAC will in no way be impacted by this proposal. As such, it is respectfully requested that no pre- or post-construction field measurement condition be placed on the herein requested permit.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Cumulus and is available to the Commission upon request.<sup>1</sup>

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1) For the purposes of environmental analysis, only the radio frequency radiation evaluation was undertaken by Graham Brock, Inc. The applicant has, or will, as necessary, conduct the balance of the environmental reviews (i.e., location of site near areas of historic importance, Indian or tribal areas, etc.).