

TECHNICAL EXHIBIT
APPLICATION FOR FM CONSTRUCTION PERMIT
RADIO STATION WBTS(FM)
DORAVILLE, GEORGIA

APRIL 27, 2006

CH 238C2 18 KW (MAX-DA) 250 M

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Technical Narrative

The technical exhibit of which this narrative is part was prepared to support an application for construction permit for WBTS(FM) on Channel 238 assigned to Doraville, Georgia. This proposal seeks to co-locate WBTS(FM) at the WSB-FM tower as a Class C2 facility with a maximum effective radiated power of 18 kilowatts, employing a directional antenna, with an antenna height above average terrain of 250 meters.

The proposal would not be subject to environmental processing in accordance with Section 1.1306. It is believed that this proposal conforms with all applicable rules and regulations of the FCC.

Proposed Transmitter Location

The transmitting facility will be located on its existing licensed supporting structure. The location is uniquely described by the following geographic coordinates:

33° 45' 33" North Latitude
84° 20' 05" West Longitude

A sketch showing the antenna and existing supporting structure is shown on Figure 1.

Interference Concerns

The 115 dBu predicted "blanketing" contour of the proposed station would extend radially less than 2 kilometers from the transmitting site. The applicant recognizes its responsibility to resolve complaints of interference, including blanketing and receiver-induced interference as required by Sections 73.315(b), 73.316(e) and 73.318.

FCC Predicted Coverage Contours

The predicted coverage contours for the proposed operation were calculated in accordance with the provisions of Section 73.313. In accordance with current FCC practice, the distances to the contours were calculated without consideration given to terrain roughness correction factors.

The average terrain elevations from 3 to 16 kilometers along eight radials evenly spaced at 45 degree intervals were obtained from the previous co-located WSB-FM application for construction permit.

Figure 2 is a map showing the predicted coverage contours. As the map illustrates, the FCC predicted 70 dBu contour entirely encompasses the principal community of Doraville.

Proposed Site Allocation Study

Channel 238C2 at the proposed site will satisfy the Commission's minimum separation distance requirements, specified in Section 73.207(b) of the Rules, to all assignments as shown by the tabulation shown in Sheet 1 of Figure 3 except for WLTM(FM) on Channel 235C1 assigned to Atlanta, WKLS(FM) on Channel 241C0 assigned to Atlanta, WHMA-FM on Channel 238A assigned to Hobson City, Alabama and WIOG(FM) on Channel 239C3 assigned to Greenville, Georgia.

With respect to WLTM(FM) and WKLS(FM), Section 73.213(a) processing is requested toward these third-adjacent channel stations. As demonstrated in a past WBTS(FM) [then WNGC-FM] application for construction permit, WBTS(FM) has been continuously short-spaced to these stations from at least November 16, 1964.¹ Since that authorization, WBTS(FM) has remained short-spaced to these stations and therefore, remains eligible to use the Section 73.213(a) allocation provisions toward WLTM(FM) and WKLS(FM).

With respect to WHMA-FM on Channel 238A at Hobson City and WIOG(FM) on Channel 239C3 assigned to Greenville, Georgia, Section 73.215 processing is requested. As seen by the contour map provided in Sheet 2 of Figure 3, no prohibited contour overlap is predicted between the herein proposed WBTS(FM) and WHMA-FM and WBTS(FM) and WIOG(FM).

¹ See FCC File Number: BPH-19971229IE, as amended on June 30, 1998. This application sought to modify WBTS(FM) by changing the station class from a Class C to a Class C1 facility and relocating its transmitter site utilizing the Section 73.213(a) allocation provisions.

Radiofrequency Electromagnetic Field Exposure

The proposed facility has been evaluated in terms of potential radiofrequency electromagnetic field exposure at ground level in accordance with OET Bulletin No. 65, *Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*.² The power density at the base of the tower was calculated using the appropriate procedure contained in Section 2, Supplement A, *Additional Information for Radio and Television Broadcast Stations*, of the Bulletin.

For the calculation, a combined horizontal and vertical polarized effective radiated power of 36 kilowatts is employed with a radiation center of 346 meters above ground level. Using an assumed "worst-case" downward relative field value of 0.5, it is calculated that the maximum power density at ground level resulting from this facility is less than 0.003 mW/cm². This is less than five percent of the maximum Commission guideline value in an uncontrolled environment for a FM radio station.³

² OET Bulletin 65, Second Edition 97-01, August, 1997.

³ The FCC maximum guideline for a FM broadcast station in an uncontrolled environment is 0.2 mW/cm².

When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency electromagnetic will not exceed the FCC guidelines.

Charles A. Cooper

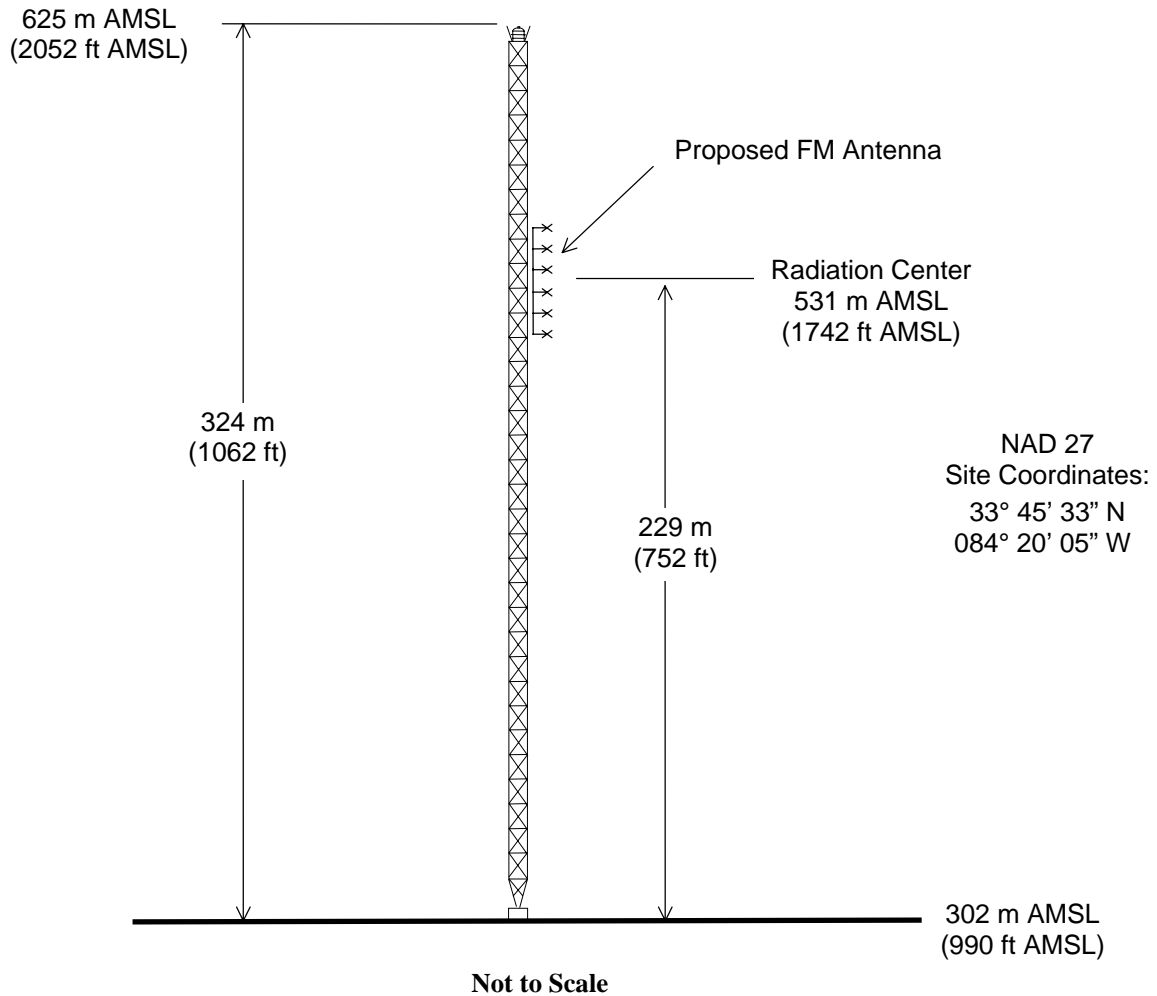
April 27, 2006

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

Figure 1



FCC Tower Registration Number
1028278



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

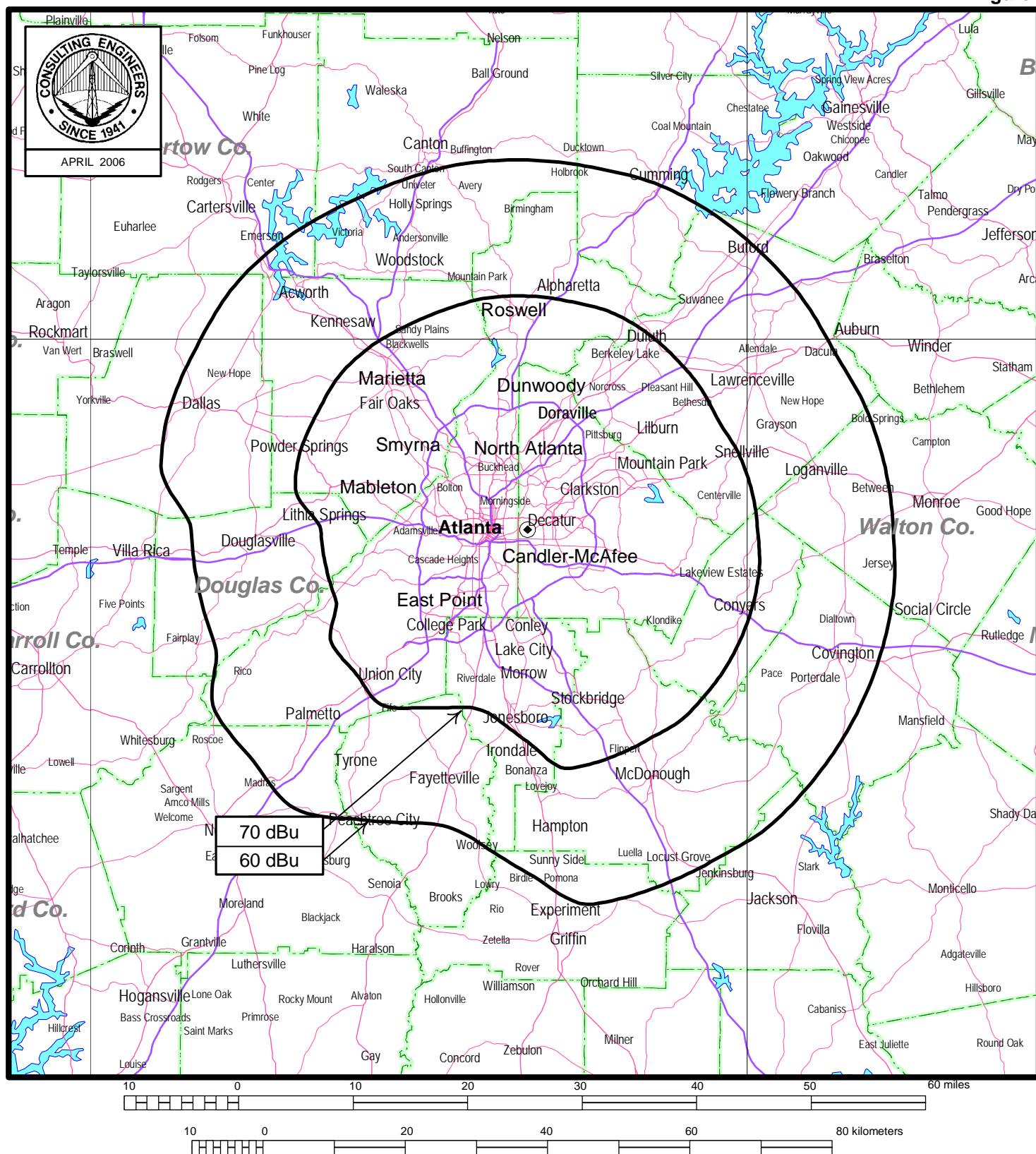
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



FCC PREDICTED COVERAGE CONTOURS

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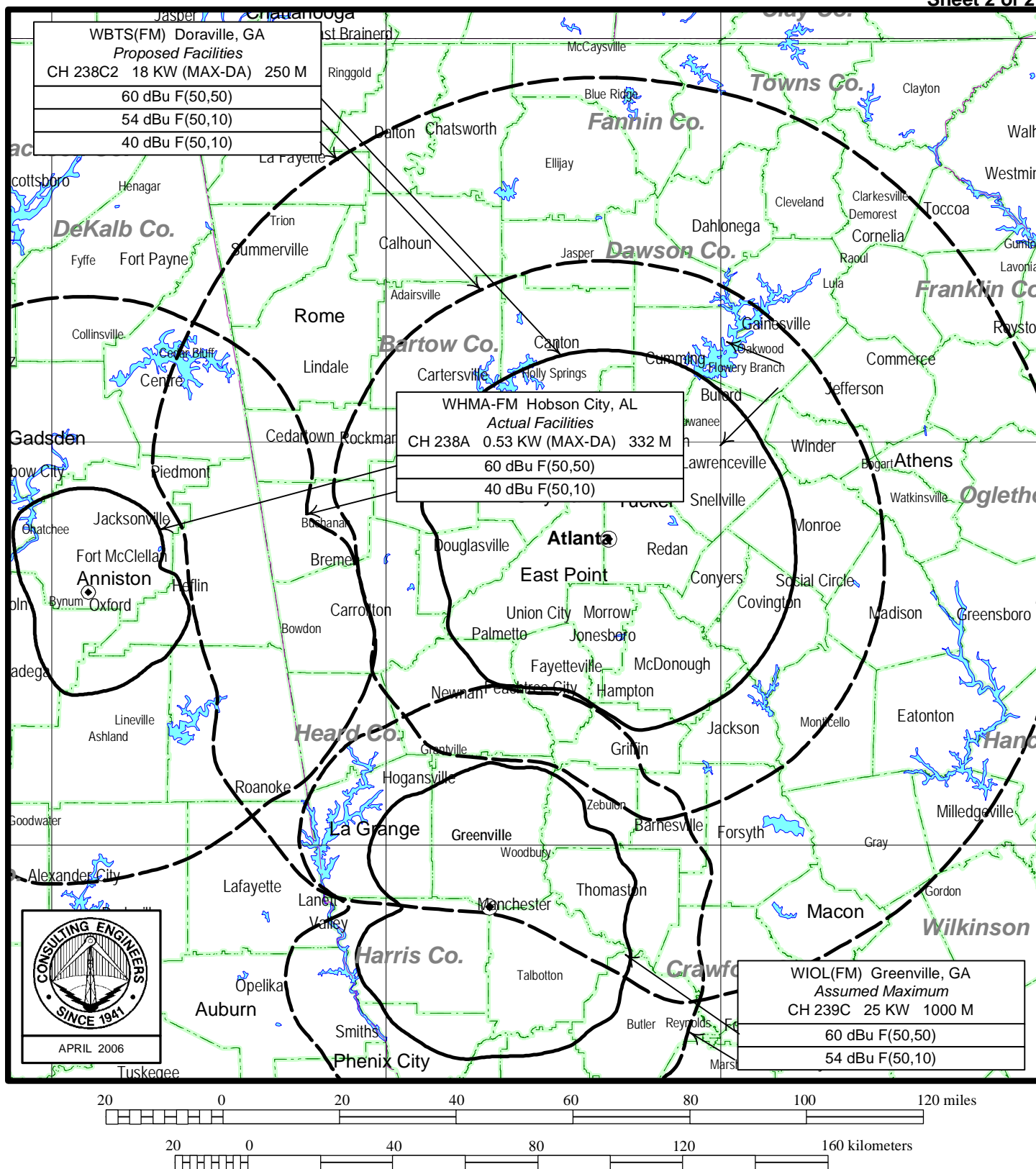
du Treil, Lundin & Rackley, Inc., Sarasota, Florida

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Channel 238C2 Proposed Site

33° 45' 33" North Latitude
84° 20' 05" West Longitude

Call Id	City St	Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. min
WLTM	ATLANTA		BLH	235 C1	100.000	N	33-48-27	N	354.0	5.39	79.0
29735	GA	LIC C	20000413ABM	94.9	298	28457	084-20-27				
<i>(Section 73.213(a) Processing Requested Towards WLTM on Channel 235C1 at Atlanta.)</i>											
WRLD-FMVALLEY			BLH	237 C3	25.000	N	32-44-03	N	213.2	135.78	117.0
52040	AL	LIC C	20011119ABL	95.3	100		085-07-53				
WBTS	DORAVILLE		BLH	238 C1	74.000	N	34-07-32	N	47.0	59.89	224.0
11710	GA	LIC C	20050620AAW	95.5	340		083-51-32				
<i>(Applicant's existing facility.)</i>											
WHMA-FMHOBSON CITY			BLH	238 A	0.530	Y	33-37-38	Y	264.6	144.97	166.0
52320	AL	LIC C	20050527BCT	95.5	332	67900	085-53-25				
<i>(Section 73.215 Processing Requested Towards WHMA-FM on Channel 238A at Hobson City.)</i>											
WIOG	GREENVILLE		BLH	239 C3	3.400	N	32-50-48	N	198.2	106.50	117.0
50534	GA	LIC C	19950303KB	95.7	267		084-41-27				
<i>(Section 73.215 Processing Requested Towards WIOG(FM) on Channel 239C3 at Greenville, Georgia.)</i>											
WATG	TRION		BLH	239 A	1.300	N	34-28-10	Y	312.0	118.68	106.0
67769	GA	LIC C	19961009KB	95.7	213		085-17-48				
	WAVERLY	HAL	RM	239 A	0.000		32-33-58		193.9	136.27	106.0
0	GA	RSV C	10813	95.7			084-41-03				
WKLS	ATLANTA		BLH	241 C0	100.000	N	33-48-27	N	354.3	5.39	89.0
11275	GA	LIC C	19880104KC	96.1	300		084-20-26				
<i>(Section 73.213(a) Processing Requested Towards WKLS on Channel 251C0 at Atlanta.)</i>											



SECTION 73.215 ALLOCATION STUDY

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du Treil, Lundin & Rackley, Inc., Sarasota, Florida