

Exhibit B-16
WFBC-FM Channel 229C Greenville, SC
Allocation Study

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C stations as prescribed in §73.207 of the Commission's Rules, with three exceptions as discussed below.

WTPT Channel 227C Forest City

WFBC operates as a "pre 1964" grandfathered short-spaced station with respect to second-adjacent-channel WTPT. Pursuant to §73.213(a)(4) of the Commission's Rules, there are no longer any distance separation or interference protection requirements with respect to second- and third-adjacent-channel short-spacings which have existed continuously since November 16, 1964. Therefore, the apparent short-spacing to WTPT is moot.

WKZX Channel 228A Lenoir City

The attached spacing study indicates an apparent 7.46 km short-spacing to the licensed operation of WKZX (FCC File No. BLH-20010314AAE). However, the prior operation of WKZX (FCC File No. BMLH-19900109KG) was located 168.74 km from WFBC, meeting the §73.207 full spacing requirement of 165 km between these two stations. In February 2001 WKZX was granted a construction permit (FCC File No. BPH-20001030ACE, later licensed as BLH-20010314AAE) to relocate to its present site under the terms of §73.215

with respect to WFBC. That WKZX facility provided full contour protection to WFBC, assuming WFBC operation with hypothetical maximum Class C facilities.

The corrected WFBC coordinates are 0.2 km further from WKZX than are the licensed WFBC coordinates. Since correction of the WFBC coordinates does not worsen the short-spacing between these two stations, and since WKZX will continue to provide full contour protection to the hypothetical maximum Class C facilities of WFBC (as demonstrated by the attached map exhibit), it is not believed necessary for WFBC to request operation pursuant to §73.215 of the Commission's Rules with respect to WKZX.

WMEV Channel 230C Marion

WFBC operates as a "pre 1964" grandfathered short-spaced station with respect to first-adjacent-channel WMEV. The attached map exhibit demonstrates that there is no overlap between the protected and interfering contours of the licensed WMEV and corrected WFBC operations, thereby satisfying §73.213(a) of the Commission's Rules with respect to WMEV.

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44444 END OF FM SPACING STUDY FOR CHANNEL 229 44444



