

**AMEND BPH-20070705ADV**  
**MINOR CHANGE APPLICATION/**  
**CHANGE COMMUNITY OF LICENSE**  
**MILLER COMMUNICATIONS, INC.**  
**WWBD (FM) RADIO STATION**  
**CH 240C2 -95.9 MHZ - 50.0 KW**  
**ISLE OF PALMS, SOUTH CAROLINA**  
**January 2008**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("MCI"), licensee of station WWBD, Channel 239C3, Bamberg, South Carolina. MCI has a pending application which proposes to change the community of license of WWBD from Bamberg, South Carolina to Isle of Palms, South Carolina, and upgrade the facility to Channel 240C2 (BPH-20070705ABV). MCI herein amends its application to relocate the actual implementation site for WWBD to another location.<sup>1</sup> Aside from the actual site at which WWBD will be constructed, no other changes are proposed.

All the exhibits impacted by the change of implementation site have been updated. However, for the staff's convenience, all of the previously submitted exhibits have been resubmitted. It is further noted that the licensee of WAVF is also amending its application. The WAVF amendment will be filed simultaneously with this instant amendment. As such, the facilities proposed in the WAVF amendment will be considered herein.

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1) At the site originally proposed, MCI, or its agents, were unable to reach an agreement on tower rental. As such, WWBD will be relocated to another existing tower in the Charleston, South Carolina area, where an agreement for tower space has been tentatively reached.

It is noted that this instant amendment is being, and the original application was, submitted contingently with an application by the licensee of WAVF, Channel 241C, Hanahan, South Carolina, proposing to change its community of license from Hanahan, South Carolina to Forestbrook, South Carolina, and an application by the licensee of WKZQ-FM, Channel 269C2, Myrtle Beach, South Carolina, proposing to change its community of license from Myrtle Beach, South Carolina to Hanahan, South Carolina as a backfill to the WAVF change. The proposed WWBD change is contingent on the WAVF change to Forestbrook, South Carolina. A copy of the contingent application agreement was provided in the July 2007 filing.

MCI is proposing to implement this change at an existing tower site. As such, the Federal Aviation Administration was not apprised of this proposal. The tower has been registered with the Commission and assigned Antenna Structure Registration Number 1062497. At the proposed site, Channel 240C2 does not meet the Commission's minimum distance separation requirements to the contingent WAVF application at Forestbrook, South Carolina. Therefore, a designated allocation reference site has been identified (Exhibit A). At the implementation site, the shortspace is addressed pursuant to §73.215 of the rules (Exhibit B).

Due to the location of the WWBD antenna on a relatively short tower, with a co-located AM station (WXTC), the use of the worksheets associated with FCC Form 301 could not be used to show compliance with the Commission's radio frequency radiation exposure limits. Therefore, attached as Exhibit C is a study showing that this proposal is in compliance with the RF limits.

As indicated on Exhibit D, the proposed change of community of license from Bamberg to Isle of Palms, South Carolina is mutually exclusive with the licensed WWBD site; Channel 240C2, from a designated allocation site (different than the proposed implementation site), meets the Commission's minimum distance separation requirements; from the designated allocation site, a city grade signal will be delivered over all of Isle of Palms; and the gain and loss areas receive a minimum of five services. Therefore, this proposal meets the Commission's technical rules for a city of license change. All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to MCI and is available to the Commission upon request.<sup>2</sup>

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2) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All other necessary reviews have been or will be addressed by the applicant.