

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

SEPTEMBER 28, 2007

CH 238C1    100 KW (MAX-DA)    250 M

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AMENDMENT TO PENDING  
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Technical Narrative

The technical exhibit of which this narrative is part was prepared to support an amendment to the pending application for construction permit for WBTS(FM) on Channel 238 assigned to Doraville, Georgia.<sup>1</sup> This amendment seeks to co-locate WBTS(FM) at the WSB-FM tower as a Class C1 facility with a maximum effective radiated power of 100 kilowatts, employing a directional antenna, with an antenna height above average terrain of 250 meters.

To accomplish this modification to WBTS-FM, station WHMA-FM on Channel 238A at Hobson City, Alabama is filing on the same date a contingent application for construction permit to modify its facility pursuant to Section 73.3517(e) of the Commission's Rules. The change to WHMA-FM is necessary so WBTS-FM can maintain its Class C1 classification.

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.

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<sup>1</sup> See FCC File Number: BPH-20060501AOE.

Proposed Transmitter Location

The transmitting facility will be located on an existing 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 4 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 238C1 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 WUBL(FM) on Channel 235C1 assigned to Atlanta; WKLS(FM) on Channel 241C0 assigned to Atlanta; WSRM(FM) on Channel 237A assigned to Coosa, Georgia; WHMA-FM on Channel 238A assigned to Hobson City, Alabama; WIOL(FM) on Channel 239C3 assigned to Greenville, Georgia; WATG(FM) on Channel 239A assigned to Trion, Georgia and WRLD-FM on Channel 237A assigned to Valley, Alabama.

With respect to WUBL(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.<sup>2</sup> 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 WUBL(FM) and WKLS(FM).

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<sup>2</sup> 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.

With respect to WRLD-FM on Channel 237C3 at Valley, Alabama and WATG(FM) on Channel 239A assigned to Trion, 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 WRLD-FM and WBTS(FM) and WATG(FM).

With respect to WSRM(FM) on Channel 237A at Coosa, WSRM(FM) has a construction permit for operation on Channel 228A at Coosa. Therefore, WSRM(FM) will cease to be an allocation issue for this instant proposal upon implementation of WSRM(FM) operation on Channel 228A.

With respect to WIOL(FM) at Greenville, Georgia, WIOL(FM) has been ordered to Channel 239A at Waverly Hall, Georgia. Therefore, WIOL(FM) will cease to be an allocation issue for this instant proposal upon implementation of its Waverly Hall operation on Channel 239A.

With respect to WHMA-FM on Channel 238A at Hobson City, Alabama, WHMA-FM has requested in a contingently filed application for Channel 237A at Alexandria. Therefore, WHMA-FM will cease to be an allocation issue for this instant proposal upon implementation of operation on Channel 237A at Alexandria.

#### 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.*<sup>3</sup>

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 200 kilowatts is employed with a radiation center of 229 meters above ground level. Using an assumed "worst-case" downward relative field value of 0.25, it is calculated that the maximum power density at ground level resulting from this facility is less than 0.008 mW/cm<sup>2</sup>. This is less than five percent of the maximum Commission guideline value in an uncontrolled environment for a FM radio station.<sup>4</sup>

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

September 28, 2007

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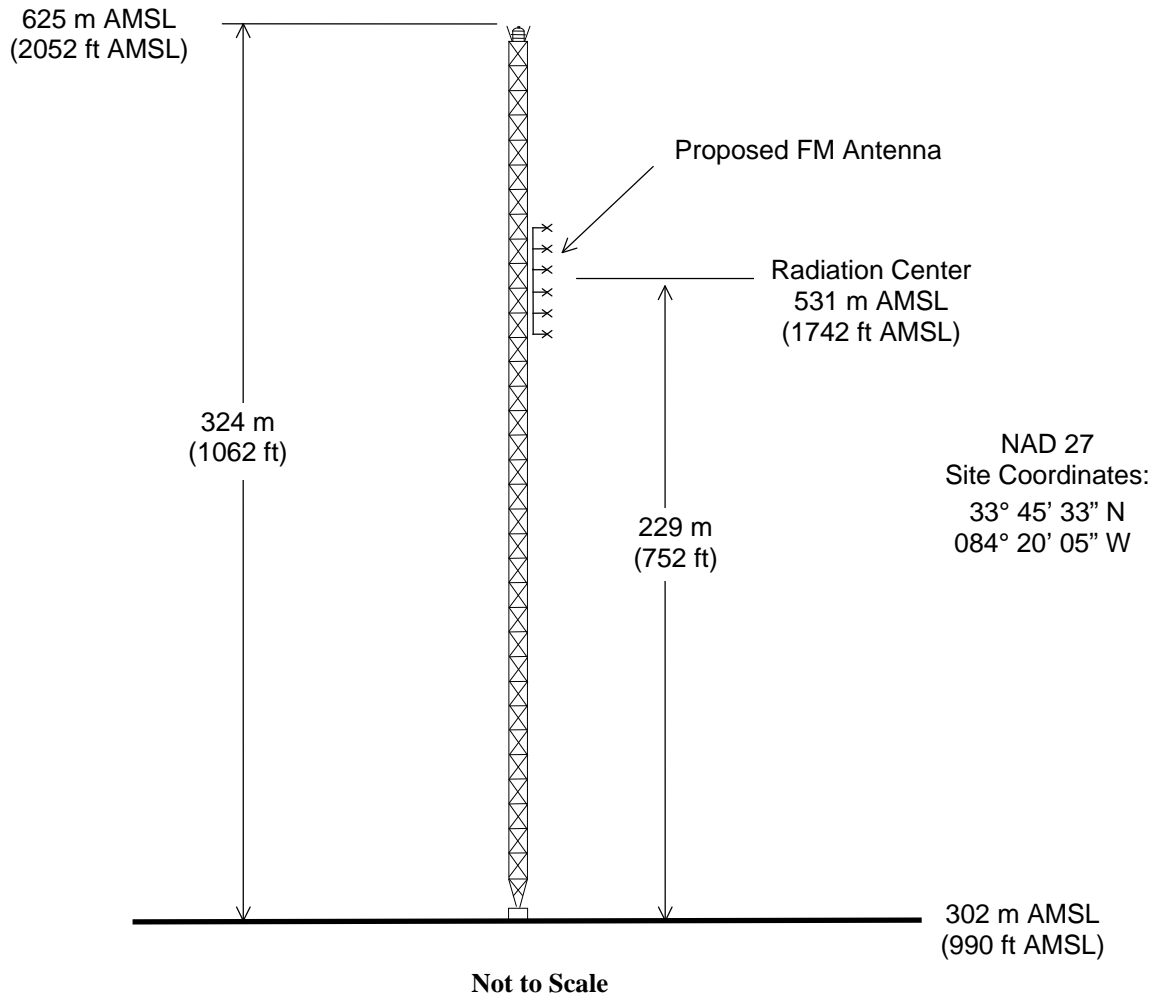
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<sup>3</sup> OET Bulletin 65, Second Edition 97-01, August, 1997.

<sup>4</sup> The FCC maximum guideline for a FM broadcast station in an uncontrolled environment is 0.2 mW/cm<sup>2</sup>.



FCC Tower Registration Number  
1028278



## **PROPOSED ANTENNA AND SUPPORTING STRUCTURE**

RADIO STATION WBTS(FM)

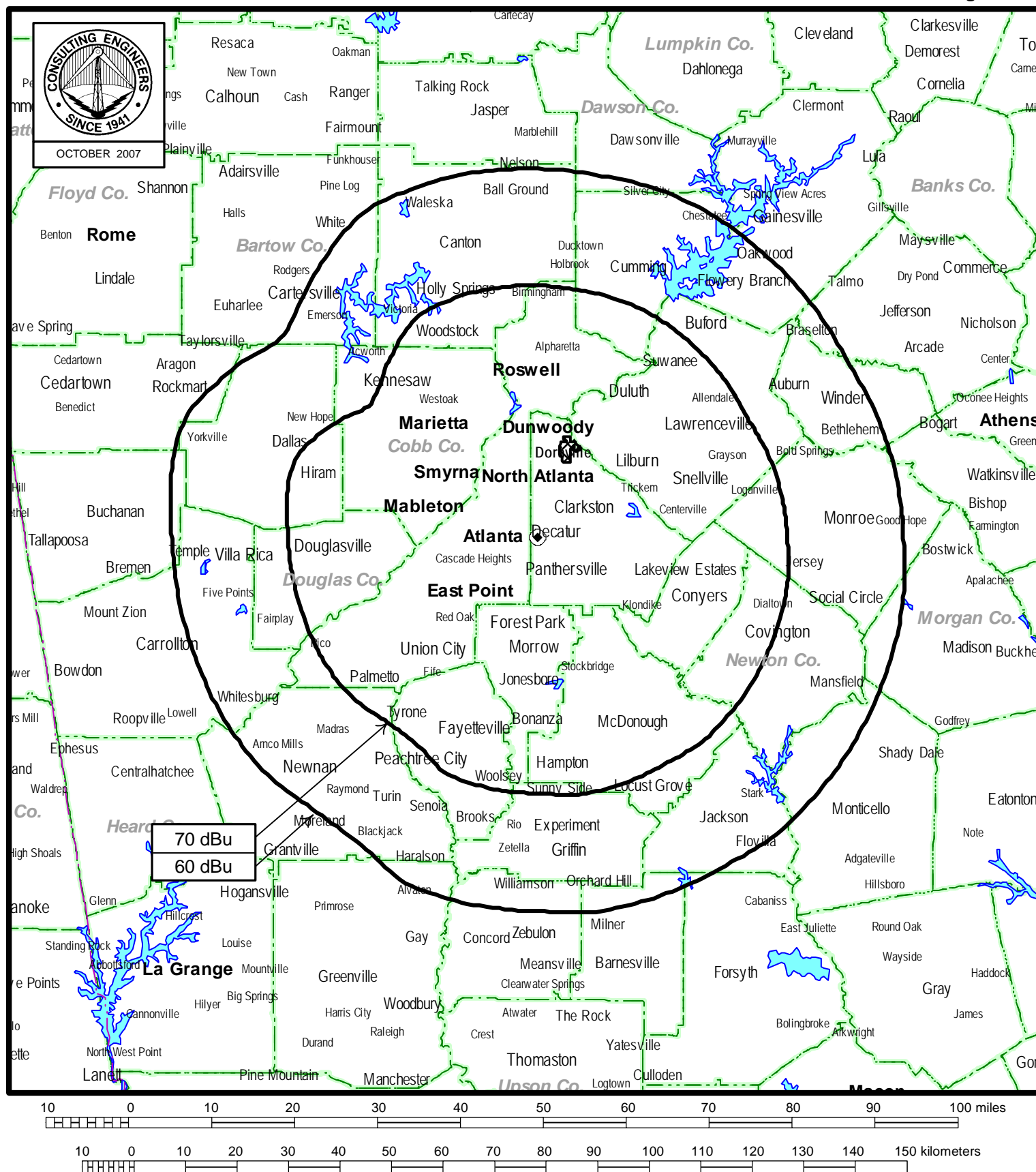
DORAVILLE, GEORGIA

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



Figure 2



## FCC PREDICTED COVERAGE CONTOURS

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Channel 238C1 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
WUBL 29735	ATLANTA GA	LIC C	20000413ABM	235C1 94.9	100 298	N	33-48-27 084-20-27	N	354.0	5.39	82.0
(Section 73.213(a) Processing Requested Towards WUBL on Channel 235C1 at Atlanta.)											
WSRM 30623	COOSA GA	LIC C	20050225AAC	237A 95.3	6 22	N	34-11-51 085-21-21	Y	297.7	106.15	133.0
(WSRM(FM) has a construction permit for operation on Channel 228A (BPH-20070629BXU). Therefore, WSRM will cease to be an allocation issue for this instant proposal upon implementation of operation on Channel 228A)											
WRLD-FM 52040	VALLEY AL	LIC C	20011119ABL	237C3 95.3	25 100	N	32-44-03 085-07-53	N	213.2	135.78	144.0
(Section 73.215 Processing Requested Towards WRLD-FM on Channel 237C3 at Valley, Alabama.)											
WBTS 11710	DORAVILLE GA	LIC C	BLH	238C1 95.5	40 432	N	34-07-32 083-51-32	N	47.0	59.89	
(Applicant's existing facility.)											
WBTS 11710	DORAVILLE GA	BPH APP C	20060501AOE	238C2 95.5	18 250	Y	33-45-33 084-20-05	Y	90.0	0.00	
(Pending application being amended by this instant proposal.)											
WHMA-FM 52320	HOBSON CITY AL	LIC C	20050527BCT	238A 95.5	0.53 332	Y	33-37-38 085-53-25	Y	264.6	144.97	200.0
(WHMA-FM has requested in a contingently filed application to Channel 237A at Alexandria. Therefore, WHMA-FM will cease to be an allocation issue for this instant proposal upon implementation of operation on Channel 237A at Alexandria.)											
WATG 67769	TRION GA	LIC C	19961009KB	239A 95.7	1.3 213	N	34-28-10 085-17-48	Y	312.0	118.68	133.0
(Section 73.215 Processing requested towards WATG(FM) on Channel 237A at Trion, Georgia.)											
WVOL 50534	GREENVILLE GA	LIC C	19950303KB	239C3 95.7	3.4 267	N	32-50-48 084-41-27	N	198.2	106.50	144.0
(WVOL(FM) has been ordered to Channel 239A at Waverly Hall, Georgia. See next record.)											
WVOL 50534	WAVERLY HAL GA	BPH CP C	20060501ANO	239A 95.7	2.8 148	N	32-35-23 084-41-44	N	194.6	133.99	133.0
WKLS 11275	ATLANTA GA	LIC C	19880104KC	241C0 96.1	100 300	N	33-48-27 084-20-26	N	354.3	5.39	94.0
(Section 73.213(a) Processing Requested Towards WKLS on Channel 251C0 at Atlanta.)											

