

**Technical Report
Minor Modification to WWEL(FM)**

This technical report has been developed in support of a minor amendment to the pending application for WWEL(FM) at London, KY, FCC file no. BPH-20081114ADN.

A change in the antenna, COR, and ERP is requested.

The following exhibits are provided in support of the form 301 application:

- E-1 Spacing Study
- E-2 Mutual Interference Agreement with WDEB-FM 280A
- E-3 70 dBu Contour Plot Coverage to London, KY

WWEL(FM) Modification:

WWEL(FM) fails to meet the minimum separation spacing with respect to WDEB-FM 280A at Jamestown, TN, facility I.D. 4135, required by CFR §73.207, as is shown in exhibit E-1. Following the rules in CFR §73.213(c)(2), both of these short-spaced class A stations may mutually consent to increase their ERP to an equivalent 6 kW ERP. Exhibit E-2 provides a copy of that agreement, which is included in the WDEB-FM modification application, FCC file no. BPH-0080609AAV.

WWEL(FM) Antenna System:

The facility will use a four bay, ERI full-wavelength nondirectional antenna at a COR AGL of 100 meters at its current tower site, ASR 1232293, at an ERP of 5.4 kW, which is two meters below the licensed COR and HAAT. The resulting 60 dBu contour at a HAAT of 106 meters is calculated to be 28.39 km. Exhibit E-3 shows the

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modification will continue to place a 70 dBu F(50-50) city-grade contour to the London, KY community of license.

RF Exposure Calculation:

The RF contribution of the 5.4 kW facility was calculated using the Commission's FMMODEL program. The maximum RF produced at a height of 2 meters above ground, was calculated to be $3.26 \mu\text{Watts}/\text{cm}^2$ at a distance of 40 meters from the tower, which is well below 5% of the $200 \mu\text{Watts}/\text{cm}^2$ permissible for general public exposure, allowing exclusion from consideration..

Conclusion:

It is concluded that the amendment to the minor modification of WWEL(FM) complies with all Commission policies and rules.



Christopher Anderson November 25, 2008
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E-1 WWEL(FM) Spacing Study

REFERENCE		CLASS = A	DISPLAY DATES
37 08 30.0 N.			DATA 11-01-08
84 04 45.0 W.		Current Spacings to 3rd Adj.	SEARCH 11-03-08
----- Channel 280 - 103.9 MHz -----			

Call	Channel	Location		Azi	Dist	FCC	Margin
WWEL	LIC 280A	London	KY	0.0	0.00	114.5	-114.50
WDEB-FM	LIC 280A	Jamestown	TN	224.2	110.70	114.5	-3.80 (1)
WDEB-FM	APP 280A	Jamestown	TN	224.2	110.70	114.5	-3.80 (1)
WEZJ-FM	LIC-Z 282C3	Williamsburg	KY	192.6	45.08	41.5	3.58
WXKQ-FM	LIC-N 280A	Whitesburg	KY	91.3	119.27	114.5	4.77
WCBJ	LIC 279A	Campton	KY	44.8	80.03	71.5	8.53
WIMZ-FM	LIC 278C	Knoxville	TN	164.1	116.11	94.5	21.61
WCKQ	LIC-Z 281C3	Campbellsville	KY	281.0	117.04	88.5	28.54
WPAY-FM	LIC-D 281C	Portsmouth	OH	28.3	195.12	164.5	30.62
WPAY-FM	RSV 281C0	Portsmouth	OH	31.9	183.17	151.5	31.67
WPAY-FM	APP-Z 281C0	Portsmouth	OH	28.3	195.12	151.5	43.62
WXYR-LP	LIC 283L1	Monticello	KY	241.7	77.68	28.5	49.18

(1) Mutual increase to maximum class by agreement and in accordance with
 Section 73.213(c)(2).

AGREEMENT

This Agreement made this 14th day of September 2008 by and between F.T.G. BROADCASTING INC. ("WWEL"), Box 1450, Corbin KY 40701 and BAZ BROADCASTING INC. ("WDEB") Box 69, Jamestown, TN 38556.

WHEREAS WDEB desires to increase its power to 3.4 KW, the maximum allowed by the FCC for a full Class A FM station with its present antenna height, but is unable to do so with out a mutual consent of WWEL; and

WHEREAS both parties hereto wish to cooperate with one another to permit both stations to increase power to the maximum allowed by the FCC for their respective locations and to permit minimal interference, if any, that may be caused by this power increase to one another.

NOW, THEREFORE, in consideration of the mutual promises herein contained, the parties hereto agree as follows:

1. It is understood that the two FM broadcast stations are short spaced to one another under section 73.207 of the FCC Rules and Regulations by a distance of approximately 4 kilometers (2.5 miles).
2. That in order to increase its effective radiated power (ERP) to full FCC Class A authorized power as allowed by the FCC rules, each party must agree to accept minimal interference, if any, from one another since they both are operating on the same frequency.
3. That both stations are willing to accept interference from one another provided that such interference, if any, does not substantially impact the present coverage of either station.
4. That each will notify the other prior to the date and time the power increase is made, following FCC approval, and if such power increase does impact the other's coverage area, the interfering station will reduce power to such a point as the interfering signal no longer causes interference. It is understood though that should this be required, that the power level that is to be reduced will not be required to be reduced to a level below that currently authorize before the increase.
5. That each station will cooperate with one another in this transition.
6. That each station is hereby authorized to apply to the FCC on its own and at its own expense to increase to maximum power.

Dated the above date and year.

BAZ BROADCASTING INC.

F.T.G. BROADCASTING INC.

BY: 

Turk Baz, President

BY: _____

Terry Fortch, President

AGREEMENT

2/2

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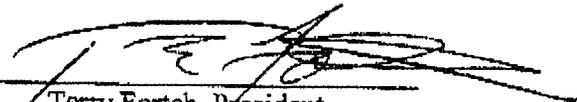
1. It is understood that the two FM broadcast stations are short spaced to one another under section 73.207 of the FCC Rules and Regulations by a distance of approximately 4 kilometers (2.5 miles).
2. That in order to increase its effective radiated power (ERP) to full FCC Class A authorized power as allowed by the FCC rules, each party must agree to accept minimal interference, if any, from one another since they both are operating on the same frequency.
3. That both stations are willing to accept interference from one another provided that such interference, if any, does not substantially impact the present coverage of either station.
4. That each will notify the other prior to the date and time the power increase is made, following FCC approval, and if such power increase does impact the other's coverage area, the interfering station will reduce power to such a point as the interfering signal no longer causes interference. It is understood though that should this be required, that the power level that is to be reduced will not be required to be reduced to a level below that currently authorize before the increase.
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Dated the above date and year.

BAZ BROADCASTING INC.

F.T.G. BROADCASTING INC.

BY: _____
Turk Baz, President

BY: 
Terry Fortch, President

E-3 WWEL 70 dBu Contour Plot

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WWEL
BLH20021113AAC
Latitude: 37-08-30 N
Longitude: 084-04-45 W
ERP: 5.40 kW
HAAT: 106.0 m
Channel: 280
Frequency: 103.9 MHz
RCAMSL Height: 466.0 m
Site Elevation: 366.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

WWEL(FM) Ch. 280A Mod.
70 dBu F(50-50) Contour

