

**Minor Change Application
Community Change Request
WTRW(FM), Two Rivers to Glenmore, Wisconsin
Channel 246A to Channel 248A
June 2008**

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station WTRW(FM), Two Rivers, Wisconsin, Facility ID No. 164253 (the "Station"), in support of a minor modification application to specify operations on channel 248A at Glenmore, Wisconsin, in lieu of channel 246A at Two Rivers, Wisconsin. This application is a contingent application with the concurrently-filed application for the minor modification of WHDG(FM), Rhinelander, Wisconsin, Facility ID No. 55211, for change of channel.

As the requested change is mutually exclusive with the Station's current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a)(i) and 73.3573(g).

The following is a summary of the merits of this proposal:

- The community of Glenmore, Wisconsin (2000 Census population 1,171 persons) would be provided with its first local aural transmission service.
- The community of Two Rivers, Wisconsin (2000 Census population 12,639 persons) would continue to have local aural transmission service from WCUB(AM), Facility ID No. 14702, and WGBW(AM), Facility ID No. 74127.
- The proposed channel 248A allotment site at Glenmore, Wisconsin satisfies the Commission's allocations spacing rules for a fully spaced, full 6 kilowatt ("kW") Class A facility.¹

¹ The proposed allotment reference coordinates are 44° 20' 40.0" North, 87° 51' 04.0" West. See this Exhibit under the heading "Compliance with FCC Rules" for details on allocations considerations with respect to

- The 60 dBu service area associated with the proposed operation of WTRW(FM) from the reference coordinates on channel 248A at Glenmore, Wisconsin would encompass 220,769 persons.
- The channel 246A at Two Rivers, Wisconsin 60 dBu loss area is well served by a number of radio services.²

Table of Figures Accompanying this Exhibit

Figure 1	WTRW(FM) Channel 248A Spacing Study at Allocations Site
Figure 2	WTRW(FM) 60 dBu Gain and Loss Areas
Figure 3	Tabulation of Services to WTRW(FM) 60 dBu Loss Area
Figure 4	Map of Services to WTRW(FM) 60 dBu Loss Area
Figure 5	WTRW(FM) Present and Proposed 70 dBu Service
Figure 6	Map of Protected Service to Proposed Community of License
Figure 7	Table of Protected Service to Proposed Community of License

this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

² See *Figures 3* and *4*.

Proposed Change

Two Rivers, Wisconsin, has a 2000 U.S. Census population of 12,639 persons. The community of Two Rivers would continue to be served by two local aural transmission services: WCUB(AM), Facility ID No. 14702, and WGBW(AM), Facility ID No. 74127.

Glenmore, Wisconsin, is located in Brown County, Wisconsin, and has a 2000 U.S. Census population of 1,187 persons. Glenmore has no local FM or AM aural transmission service and, therefore, this proposal would bring a first local aural transmission service to Glenmore.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 248A at Glenmore, Wisconsin. The allotment reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed full power stations and allotments as a full 6 kW Class A allotment, except for WTRW(FM)'s existing channel 246A operation at Two Rivers, Wisconsin, for which this proposal is a mutually exclusive substitute, and except for the licensed facility of WHDG(FM), Rhinelander, Wisconsin, Facility ID No. 55211, which will be fully spaced pursuant to the contingent modification application being concurrently filed.

Operation from the channel 248A reference site would provide the requisite community grade (70 dBu) signal to all of Glenmore.³ *Figure 5* is a map which depicts the community grade coverage (70 dBu) contour based on maximum class A facilities (ERP 6 kW/HAAT 100 meters) at the proposed allotment site. As shown, all (100%) of Glenmore is located within the predicted 70 dBu community grade contour.

³ See *Figure 5* herein.

Proposed 60 dbu Area

There would be 220,769 persons residing within the proposed WTRW(FM) 60 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within WTRW(FM)'s proposed 60 dBu contour would be 2,460 square kilometers.

Proposed 70 dbu Area

There would be 22,331 persons residing within the proposed WTRW(FM)'s 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities; the area within WTRW(FM)'s proposed 70 dBu contour would be 803 square kilometers.

60 dbu Gain and Loss Areas

There are currently 70,066 persons residing within the WTRW(FM) 60 dBu contour. There would be 220,769 persons residing within the proposed WTRW(FM) 60 dBu contour; 20,110 persons currently residing within the WTRW(FM) 60 dBu contour would continue to receive service under this proposal; 49,956 persons would lose service; and 200,659 persons would gain new 60 dBu service as a result of the proposed operation at Glenmore, for a net aggregate increase of 150,703 persons. See *Figure 2*.

The 60 dBu loss area related to the modification of WTRW(FM) to Glenmore is well served by many aural services. See *Figures 3 and 4*.

Urbanized Area Considerations

The proposed channel 248A 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class A facilities would encompass 3.3% of the population and 4.5% of the area of the Green Bay, Wisconsin Urbanized Area. From the antenna location coordinates specified in the minor modification application for the Station and based on the antenna specifications in the application, the proposed channel 248A 70 dBu contour would encompass 88% of the population and 95% of the area of the Green Bay, Wisconsin Urbanized Area.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions. The AM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.182.

Population and Area

The population within the FM contours was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Protected Service to Proposed Community of License

Glenmore, Wisconsin, the proposed community of license, currently receives protected aural service from 26 radio stations, as shown in *Figures 6 and 7* (counting those stations which provide protected service to at least 80 percent of the area of the community of license).

Conclusion

WTRW(FM) can be modified from operation on channel 246A at Two Rivers, Wisconsin, to operation on channel 248A at Glenmore, Wisconsin, in compliance with all applicable Commission rules. The community of Glenmore, Wisconsin would be provided with a first local aural transmission service, and the community of Two Rivers, Wisconsin would continue to have local aural transmission service from two existing stations. No service would be lost in any underserved area⁴ and no new underserved areas would be created as a result of this proposal. Therefore, the licensee requests the issuance of a construction permit for

⁴ Defined as an area receiving service from less than five aural broadcast services. In the case of this proposal, the 60 dBu loss areas will continue to receive 60 dBu service from multiple sources, local and distant. See *Figures 3 and 4*.

the minor modification of WTRW(FM) to specify operations on channel 248A at Glenmore, Wisconsin.

Figure 1

Spacing Study at Allocation Site

ComStudy 2.2 search of channel 248 (97.5 MHz Class A) at 44-20-40.0 N, 87-51-04.0 W.

Callsign	State	City	Freq	Chanl	Class	Status	Dist_km	Sep	Clr
WHDG	WI	RHINELANDER	97.5	248	C1	LIC	156.35	200	-43.6 ⁵
WHDG	WI	RHINELANDER	97.3	247	C1	APP	156.35	133	23.4 ⁶
NEW	WI	GREEN BAY	97.7	249	LP100	APP	24.34	56	-31.7
NEW	WI	GREEN BAY	97.7	249	LP100	APP	24.34	56	-31.7
WTRW	WI	TWO RIVERS	97.1	246	A	LIC	30	31	-1
WTRW	WI	TWO RIVERS	97.1	246	A	APP	30	31	-1
WSRG	WI	STURGEON BAY	97.7	249	A	LIC	72.95	72	0.9
WTRW	WI	TWO RIVERS	97.1	246	A	USE	31.13	31	0.1
WFDL-FM	WI	LOMIRA	97.7	249	C3	LIC	90.11	89	1.1
WLKN	WI	CLEVELAND	98.1	251	A	USE	40.38	31	9.4
WLKN	WI	CLEVELAND	98.1	251	A	LIC	40.62	31	9.6

⁵ Contingent application filed for channel change will eliminate this short spacing.

⁶ Contingent application.

Figure 2
60 dBu Gain and Loss Areas

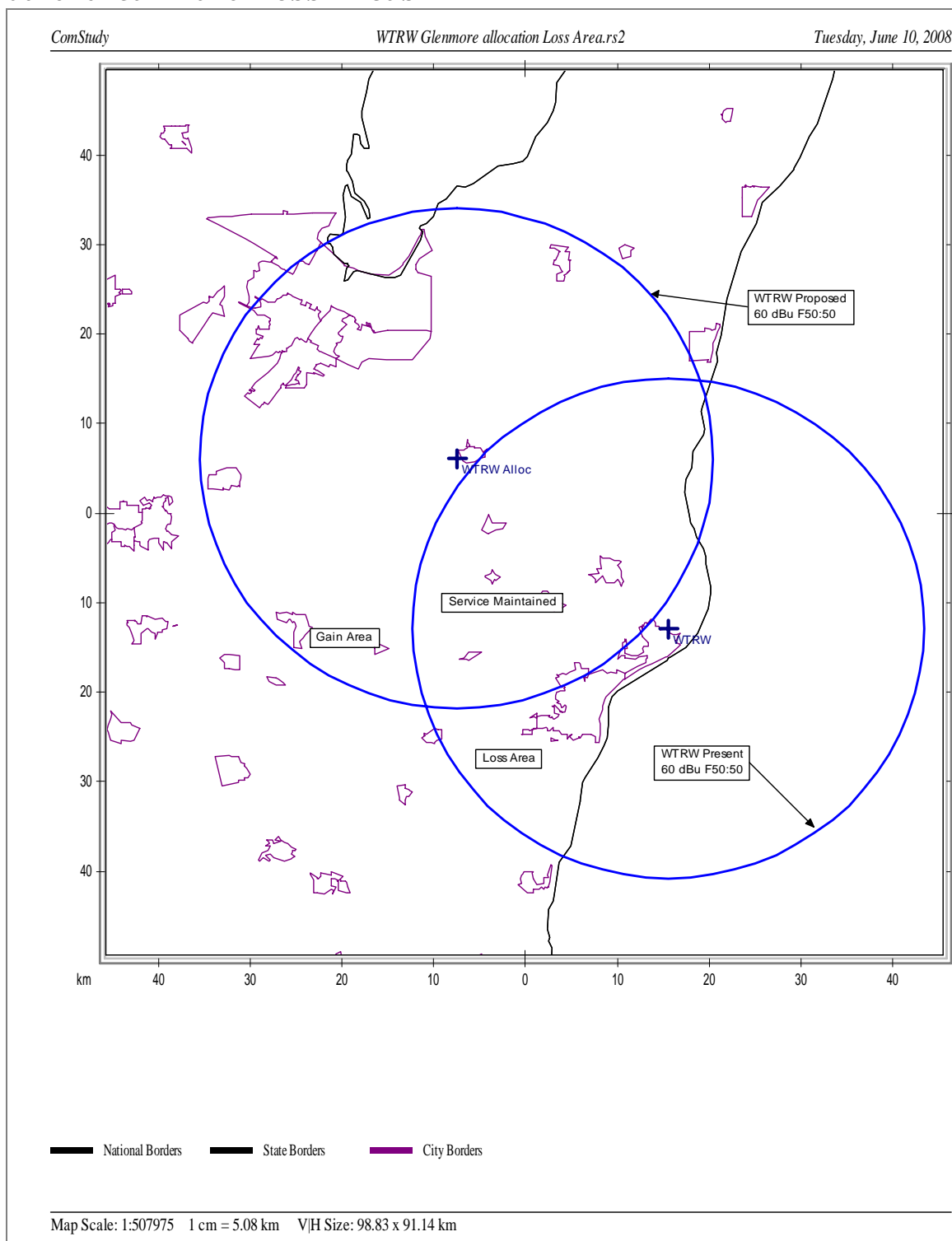


Figure 3
 Tabulation of Services to 60 dBu Loss Area

Call Sign	Facility_id	City	State
WOGB	89	KAUKAUNA	WI
WPCK	119	DENMARK	WI
WKSZ	1518	DE PERE	WI
WZOR	4098	MISHICOT	WI
WHID	4215	GREEN BAY	WI
WRST-FM	4291	OSHKOSH	WI
WMBE	6649	CHILTON	WI
WDUZ-FM	6861	BRILLION	WI
WROE	9962	NEENAH-MENASHA	WI
WNCY-FM	9965	NEENAH-MENASHA	WI
WNFL	9966	GREEN BAY	WI
WHBL	9967	SHEBOYGAN	WI
WBFM	9968	SHEBOYGAN	WI
WLTU	14701	MANITOWOC	WI
WCUB	14702	TWO RIVERS	WI
WDOR	17307	STURGEON BAY	WI
WJOK	19879	KAUKAUNA	WI
WPFF	20612	STURGEON BAY	WI
WDUZ	25119	GREEN BAY	WI
WAUN-FM	26006	KEWAUNEE	WI
WJUB	32846	PLYMOUTH	WI
WORQ	36412	GREEN BAY	WI
WCLB	36423	SHEBOYGAN	WI
WHBZ	41614	SHEBOYGAN FALLS	WI
WTAQ	42086	GREEN BAY	WI
WIXX	42087	GREEN BAY	WI
WZBY	42090	STURGEON BAY	WI
WBDK	48848	ALGOMA	WI
WNAM	50053	NEENAH-MENASHA	WI
WQTC-FM	59609	MANITOWOC	WI
WOMT	59610	MANITOWOC	WI
WPNE-FM	63060	GREEN BAY	WI
WLKN	67716	CLEVELAND	WI
WOSH	69780	OSHKOSH	WI
WSCO	72941	APPLETON	WI
WAPL	73659	APPLETON	WI
WHBY	73660	KIMBERLY	WI
WGBW	74127	TWO RIVERS	WI

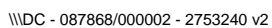


Figure 5
Present and Proposed 70 dBu Service

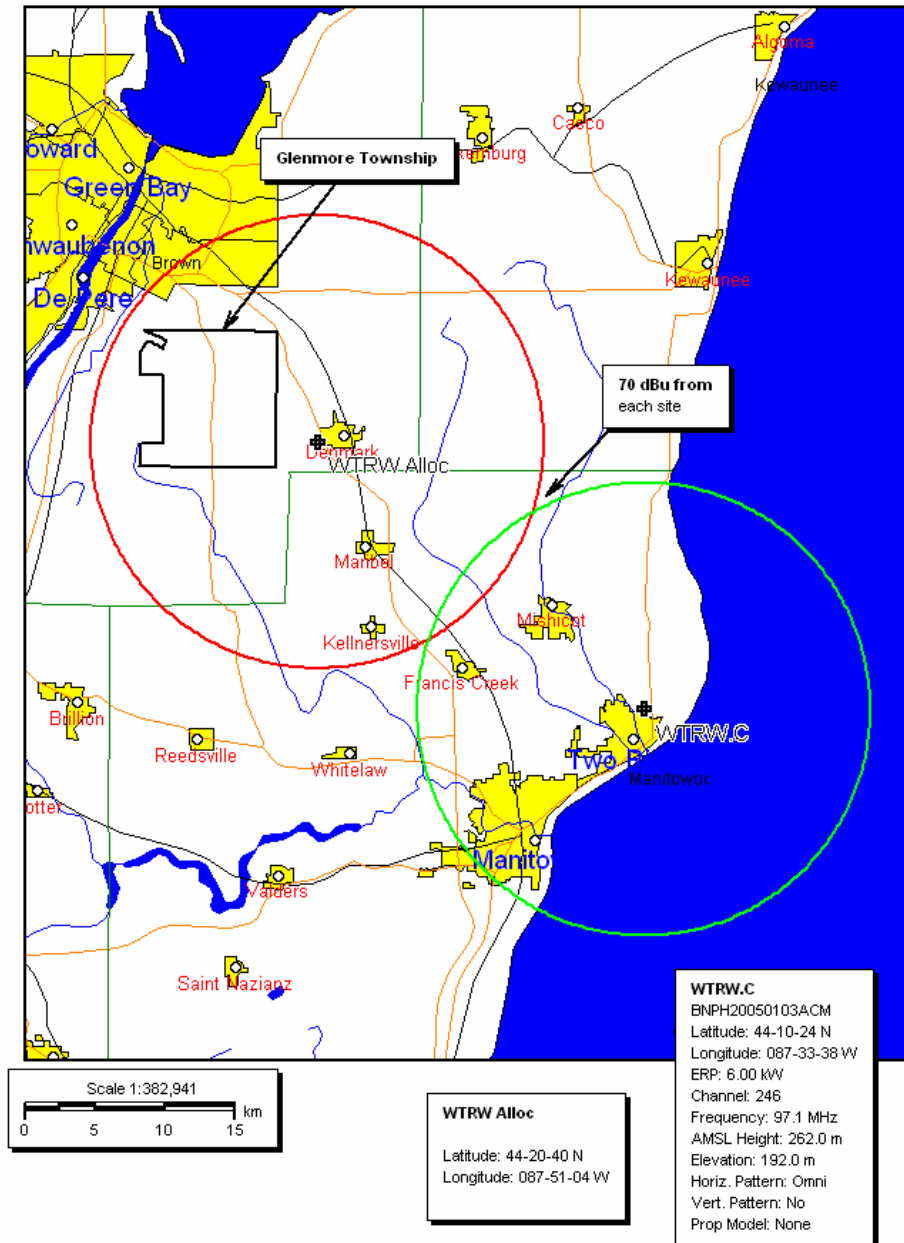


Figure 7

Table of Protected Service to Proposed Community of License

No.	Call Sign	Facility_id	City	State
1.	WNCY-FM	9965	NEENAH-MENASHA	WI
2.	WPNE-FM	63060	GREEN BAY	WI
3.	WQLH	25121	GREEN BAY	WI
4.	WIXX	42087	GREEN BAY	WI
5.	WZNN	31912	ALLOUEZ	WI
6.	WZOR	4098	MISHICOT	WI
7.	WAPL	73659	APPLETON	WI
8.	WPCK	119	DENMARK	WI
9.	WEMY	69196	GREEN BAY	WI
10.	WORQ	36412	GREEN BAY	WI
11.	WKSZ	1518	DE PERE	WI
12.	WZBY	42090	STURGEON BAY	WI
13.	WHID	4215	GREEN BAY	WI
14.	WDUZ-FM	6861	BRILLION	WI
15.	WGOB	89	KAUKAUNA	WI
16.	WNFL	9966	GREEN BAY	WI
17.	WSCO	72941	APPLETON	WI
18.	WNAM	50053	NEENAH-MENASHA	WI
19.	WTAQ	42086	GREEN BAY	WI
20.	WJOK	19879	KAUKAUNA	WI
21.	WHBY	73660	KIMBERLY	WI
22.	WHBL	9967	SHEBOYGAN	WI
23.	WDUZ	25119	GREEN BAY	WI
24.	WCUB	14702	TWO RIVERS	WI
25.	WGBW	74127	TWO RIVERS	WI
26.	WOMT	59610	MANITOWOC	WI