

AMENDMENT

ENGINEERING STATEMENT OF

EDWARD P. DE LA HUNT IN SUPPORT OF

MINOR CHANGE APPLICATION TO CHANGE

COMMUNITY OF LICENSE RADIO STATION

WWXX(FM) WARRENTON, VA TO

BUCKLAND, VA CHANNEL 232A – 2.0 kW

ERP -175 M HAAT FACILITY ID NO. 16819

GENERAL

I am a Consulting Engineer, my education and experience is a matter of record with the Federal Communications Commission. An amended engineering statement, FCC Form 301, and associated exhibits have been prepared on behalf of Red Zebra Broadcasting Licensee, Inc., licensee of WWXX(FM), Warrenton, Virginia. By means of this application, the applicant proposes to change WWXX(FM)'s community of license from Warrenton, Virginia to **Buckland, Virginia**.¹

¹ See Report and Order, *In the Matter of Revision of Procedures Governing Amendments to the FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, MB Docket 05-210, FCC 06163, released November 29, 2006.

PROPOSED FACILITY/ALLOTMENT SITE LOCATION

No changes are proposed for WWXX(FM)'s current licensed transmitter site. The transmitter site is uniquely described by the NAD-27 coordinates of North Latitude 38 degrees 44 minutes 31 seconds, West Longitude 77 degrees 50 minutes 07 seconds. In addition, no changes in tower height, antenna height, effective radiated power (ERP) or other technical facilities are proposed. The proposed allotment site is uniquely described by the NAD-27 coordinates of North Latitude 38 degrees 44 minutes 32 seconds, West Longitude 77 degrees 50 minutes 36 seconds.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours remain unchanged from the WWXX(FM) license. Utilizing the facilities authorized by the WWXX(FM) license, and the prediction methods described in Section 73.313 of the Rules, utilizing the appropriate F(50,50) propagation curves from the Rules (Section 73.333, Figure 1), effective radiated power, and antenna height above average terrain as determined for each profile radial, the proposed 3.16 mV/m (70 dBu) city grade contour will completely encompass the principal community to be served **Buckland, Virginia**. *See Exhibit 1.*

ALLOCATION STUDY

WWXX(FM)'s FM channel allocation remains unchanged with the exception of the proposed change in Community of License. The FCC's policy is well established that community of license changes that do not involve changes to the technical parameters are permissible notwithstanding the presence of pre-1964, pre-1989 and Section 73.215 short-spacings. However, Station WWXX(FM) is classified as a Section 73.215; a Section 73.215 classification that WWXX(FM) sought. Therefore, it is necessary for WWXX(FM) to demonstrate that a full-spaced allotment reference point does exist for the proposed minor change. The proposed change does not contemplate a change in operating channel/class; propose an increase in ERP; no new short-spacings will be created, and no existing short-spacing would be exacerbated. Nonetheless, the existing Section 73.215 contour protection requirements of the current license site are unchanged.

The proposed allotment reference site is not short-spaced and will provide community coverage to Buckland, Virginia. Therefore, consistent with FCC policy, WWXX(FM) should be afforded the opportunity to change its community of license

FAA NOTIFICATION

No FAA notification or FCC Tower Registration is required. The existing WWXX(FM) antenna is side mounted on an existing tower less than 200 feet in overall height above ground. Pursuant to the current WWXX(FM) license, no painting and lighting requirements are necessary. This proposal does not propose any changes to the existing tower.

SUMMARY

Comparing the existing versus the proposed allotment arrangement, the proposed re-allotment of Channel 232A from Warrenton, VA to Buckland, VA will result in a preferential arrangement of allotments. This determination is based upon the FM allotment priorities set forth in *Revision of FM Assignment Policies and Procedure*.⁵ In addition, the WWXX(FM) re-allotment proposal described herein complies with the Rules and Regulations of the Federal Communications Commission.

This statement and attached exhibits were prepared by me or under my direct supervision and are true and correct.

DATED: October 12, 2009

//signed//

Edward P. De La Hunt

⁴ The service contour for FM stations was the pertinent protected primary service contour for station class. For AM stations, the daytime 2 mV/m contour was used.

⁵ See 90 FCC 2d 88 (1982). The FM allotment priorities are (1) First full-time aural service; (2) Second full-time aural service; (3) First local service; and (4) other public interest matters. {Co-equal weight is given to priorities (2) and (3).}

