

MINOR CHANGE APPLICATION
UNITY BROADCASTING, INC.
WLCS RADIO STATION
CH 252A - 98.3 MHZ - 1.6 KW
NORTH MUSKEGON, MICHIGAN
September 2002

EXHIBIT A

Present WLCS Shortages

Channel 252A was allotted to North Muskegon, Michigan, prior to October 2, 1989. Prior to this date only 3.0 kilowatt Class A stations were authorized. After October 2, 1989, the minimum distance separation requirements for Class A stations were changed to accommodate an increase in the maximum power for Class A stations from 3.0 to 6.0 kilowatts. At the present WLCS licensed site, Channel 252A does not meet the Commission's minimum distance separation requirements to one existing station, WCSY-FM, Channel 252A, South Haven, Michigan (Exhibit A1). Channel 252A was also allotted to South Haven, Michigan, prior to October 2, 1989. Both WLCS and WCSY-FM are operating with no more than maximum 3.0 kilowatt Class A facilities. As is shown on Exhibit A1, the distance between the stations is 108.37 kilometers. Pursuant to §73.213(c)(1), co-channel Class A stations must be separated by 105.0 kilometers. As such, the licensed WLCS facility is in compliance with §73.213(c)(1).

This instant relocation moves the WLCS facilities further away from WCSY-FM (see Exhibit A2). The proposed WLCS site is located 112.84 kilometers from WCSY-FM. Since this distance is still greater than the 105.0 kilometer requirement and WLCS will remain an equivalent 3.0 kilowatt Class A facility, UBI believes that this proposal is in compliance with §73.213 (c)(1) of the Commission's rules with respect to WCSY-FM.

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EXHIBIT A1

CLEARANCE STUDY FOR WLCS NORTH MUSKEGON, MICHIGAN
USING LICENSED SITE AS REFERENCE

REFERENCE		DISPLAY DATES
43 16 34 N	CLASS A	DATA 09-06-02
86 14 45 W	Current rules spacings	SEARCH 09-09-02
----- CHANNEL 252 - 98.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WLCS	252A	North Muskegon	MI	0.0	0.00	115.0	-115.00
LIC CN	43 16 34	86 14 45	2.600 kW	98M	0.0	71.5	
	Joseph E. Cohen, Chapter 11			BLH-19831223AE			

* <i>WCSYFM</i>	<i>252A</i>	<i>South Haven</i>	<i>MI</i>	<i>180.2</i>	<i>108.37</i>	<i>115.0</i>	<i>-6.63</i>
<i>LIC CN</i>	<i>42 18 02</i>	<i>86 15 03</i>	<i>1.900 kW</i>	<i>123M</i>	<i>67.3</i>	<i>71.5</i>	
	<i>WSJM Inc.</i>			<i>BLH-19920828KA</i>			
 <i>WGRDFM</i>	 <i>250B</i>	 <i>Grand Rapids</i>	 <i>MI</i>	 <i>137.6</i>	 <i>72.15</i>	 <i>69.0</i>	 <i>3.15</i>
<i>LIC CN</i>	<i>42 47 46</i>	<i>85 38 58</i>	<i>13.000 kW</i>	<i>180M</i>	<i>44.8</i>	<i>42.9</i>	
	<i>Regent Broadcasting of Grand Rpds</i>			<i>BLH-19880321KE</i>			
** <i>WCSYFM</i>	<i>252A</i>	<i>South Haven</i>	<i>MI</i>	<i>180.2</i>	<i>108.37</i>	<i>105.0</i>	<i>3.37</i>
<i>LIC CN</i>	<i>42 18 02</i>	<i>86 15 03</i>	<i>1.900 kW</i>	<i>123M</i>	<i>67.3</i>	<i>65.2</i>	
	<i>WSJM Inc.</i>			<i>BLH-19920828KA</i>			
 <i>WFGR</i>	 <i>254A</i>	 <i>Grand Rapids</i>	 <i>MI</i>	 <i>121.1</i>	 <i>52.25</i>	 <i>31.0</i>	 <i>21.25</i>
<i>LIC CN</i>	<i>43 01 57</i>	<i>85 41 47</i>	<i>2.750 kW</i>	<i>150M</i>	<i>32.5</i>	<i>19.3</i>	
	<i>Regent Broadcasting of Grand Rpds</i>			<i>BLH-19920806KD</i>			
 <i>WJMRFM</i>	 <i>252A</i>	 <i>Menomonee Falls</i>	 <i>WI</i>	 <i>260.3</i>	 <i>143.41</i>	 <i>115.0</i>	 <i>28.41</i>
<i>LIC C</i>	<i>43 02 49</i>	<i>87 58 52</i>	<i>4.900 kW</i>	<i>111M</i>	<i>89.1</i>	<i>71.5</i>	
	<i>Lakefront Communications, Inc.</i>			<i>BLH-20001213ACF</i>			
 <i>WUPS</i>	 <i>253C1</i>	 <i>Houghton Lake</i>	 <i>MI</i>	 <i>46.5</i>	 <i>165.26</i>	 <i>133.0</i>	 <i>32.26</i>
<i>LIC CN</i>	<i>44 17 18</i>	<i>84 44 30</i>	<i>100.000 kW</i>	<i>299M</i>	<i>102.7</i>	<i>82.7</i>	
	<i>Coltrace Communications, Inc.</i>			<i>BLH-19881102KE</i>			
 <i>ALLO</i>	 <i>255A</i>	 <i>St. Helen</i>	 <i>MI</i>	 <i>5.0</i>	 <i>69.83</i>	 <i>31.0</i>	 <i>38.83</i>
<i>VAC</i>	<i>43 54 08</i>	<i>86 10 13</i>	<i>0.000 kW</i>	<i>0M</i>	<i>43.4</i>	<i>19.3</i>	
				<i>RM</i>			

* *Note: Shortage under §73.207.*

** *Note: Clearance to WCSY-FM is based on §73.213(c) (1).*

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EXHIBIT A2

CLEARANCE STUDY FOR WLCS NORTH MUSKEGON, MICHIGAN
USING PROPOSED SITE AS REFERENCE

REFERENCE		DISPLAY DATES
43 18 50 N	CLASS A	DATA 09-06-02
86 09 17 W	Current rules spacings	SEARCH 09-09-02
----- CHANNEL 252 - 98.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WLCS	252A	North Muskegon	MI	240.4	8.50	115.0	-106.50
LIC CN	43 16 34	86 14 45	2.600 kW	98M	5.3	71.5	
	Joseph E. Cohen, Chapter 11			BLH-19831223AE			

* <i>WCSYFM</i>	<i>252A</i>	<i>South Haven</i>	<i>MI</i>	<i>184.0</i>	<i>112.84</i>	<i>115.0</i>	<i>-2.16</i>
<i>LIC CN</i>	<i>42 18 02</i>	<i>86 15 03</i>	<i>1.900 kW</i>	<i>123M</i>	<i>70.1</i>	<i>71.5</i>	
	<i>WSJM Inc.</i>			<i>BLH-19920828KA</i>			
 WGRDFM	 250B	 Grand Rapids	 MI	 144.3	 70.73	 69.0	 1.73
LIC CN	42 47 46	85 38 58	13.000 kW	180M	44.0	42.9	
	Regent Broadcasting of Grand Rpds			BLH-19880321KE			
** <i>WCSYFM</i>	<i>252A</i>	<i>South Haven</i>	<i>MI</i>	<i>184.0</i>	<i>112.84</i>	<i>105.0</i>	<i>7.84</i>
<i>LIC CN</i>	<i>42 18 02</i>	<i>86 15 03</i>	<i>1.900 kW</i>	<i>123M</i>	<i>70.1</i>	<i>65.2</i>	
	<i>WSJM Inc.</i>			<i>BLH-19920828KA</i>			
 WFGR	 254A	 Grand Rapids	 MI	 129.9	 48.64	 31.0	 17.64
LIC CN	43 01 57	85 41 47	2.750 kW	150M	30.2	19.3	
	Regent Broadcasting of Grand Rpds			BLH-19920806KD			
 WUPS	 253C1	 Houghton Lake	 MI	 45.8	 157.01	 133.0	 24.01
LIC CN	44 17 18	84 44 30	100.000 kW	299M	97.6	82.7	
	Coltrace Communications, Inc.			BLH-19881102KE			
 ALLO	 255A	 St. Helen	 MI	 358.9	 65.38	 31.0	 34.38
VAC	43 54 08	86 10 13	0.000 kW	0M	40.6	19.3	
				RM			
 WJMRFM	 252A	 Menomonee Falls	 WI	 259.3	 151.43	 115.0	 36.43
LIC C	43 02 49	87 58 52	4.900 kW	111M	94.1	71.5	
	Lakefront Communications, Inc.			BLH-20001213ACF			

* *Note: Shortage under §73.207.*

** *Note: Clearance to WCSY-FM is based on §73.213(c) (1).*