

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

* *Note: Shortage under §73.207.*
** *Note: Clearance to WCSY-FM is based on §73.213(c)(1).*