

TECHNICAL EXHIBIT  
APPLICATION FOR MODIFICATION OF  
FM CONSTRUCTION PERMIT  
RADIO STATION WWWD(FM)  
BOLINGBROKE, GEORGIA

DECEMBER 11, 2003

CH 271A    6 KW    100 M

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Technical Narrative

The technical exhibit of which this narrative is part was prepared as a modification to the construction permit for WWWD(FM) on Channel 271A at Bolingbroke, Georgia.<sup>1</sup> This modification solely seeks to increase the effective radiated power to 6 kilowatts by obtaining the consent of radio station WKZR(FM) at Milledgeville, Georgia pursuant to Section 73.213(c) of the Commission's Rules. No other changes are requested.

The proposal would not be subject to environmental processing in accordance with Section 1.1306. The FCC Tower Registration Number is 1022017. It is believed that this proposal conforms with all applicable rules and regulations of the FCC.

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<sup>1</sup> See FCC File Number: BPH-19970407MP.

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Proposed Antenna Supporting Structure

A site map showing the location of the proposed transmitter site is provided in Figure 1. A sketch showing the proposed antenna and supporting structure is shown on Figure 2.

Interference Concerns

The 115 dBu predicted "blanketing" contour of the proposed station would extend radially 1 kilometer from the transmitting site. No interference is expected. However, the applicant recognizes its responsibility to resolve complaints of interference, including blanketing and receiver-induced interference as required by Sections 73.315(b), 73.316(e) and 73.318.

Coverage Contours

The predicted coverage contours for the proposed operation were calculated in accordance with the provisions of Section 73.313. In accordance with current FCC practice, the distances to the contours were calculated without consideration given to terrain roughness correction factors.

The average terrain elevations from 3 to 16 kilometers along eight radials evenly spaced at 45-degree intervals were derived from the N.G.D.C's 30 second terrain database.

Figure 3 is a map showing the predicted coverage contours. The principal community of Bolingbroke does not have city limits according to the 2000, 1990 or 1980 U.S. Census files. However, as observed from the Coverage Map contained in Figure 3, the FCC predicted 70 dBu coverage contour will completely encompass the principal community of Bolingbroke. Also, as this instant proposal just increases the effective radiated power from 3 kilowatts to 6 kilowatts, it is obvious that coverage in Bolingbroke will be improved.

#### Allocation Study

Sheet 1 of Figure 4 is an allocation study for channel 271A at the proposed site. The figure contains a tabulation of actual and required separation distances from other pertinent stations and allotments. The proposed site meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations except toward WGMG(FM) on Channel 271C3 at Crawford, Georgia and WKZR(FM) on Channel 272A at Milledgeville, Georgia.

Section 73.215 processing is requested towards WGMG(FM) at Crawford, Georgia. The actual separation distance is 128.2 kilometers from the proposed facility to WGMG(FM); the minimum fully spaced (Section 73.207) separation distance is 142 kilometers; the minimum short-spaced (Section 73.215) separation distance is 119 kilometers. There is no predicted prohibited contour overlap between the proposed facility and WGMG(FM) as shown on Sheet 2 of Figure 4. It is noted that since WGMG(FM) is also authorized pursuant to Section 73.215, only the actual WGMG(FM) facilities were protected.

Section 73.213(c) processing is requested towards WKZR(FM) at Milledgeville, Georgia.<sup>2</sup> The actual separation distance is 64.8 kilometers from the proposed facility to WKZR(FM); the minimum fully spaced (Section 73.207) separation distance is 72 kilometers; the minimum Section 73.213(c) separation distance is 64 kilometers. Therefore, the proposed facility satisfies the minimum distance requirement to WKZR(FM) pursuant to Section 73.213(c). WKZR(FM) is also seeking a mutual upgrade to operate with 6 kilowatts at 100 meters in a contingent application for construction permit as permitted by Section 73.213(c). A copy of the agreement between the stations is provided within the Appendix.

#### Radiofrequency Electromagnetic Field Exposure

The proposed facility has been evaluated in terms of potential radiofrequency electromagnetic field exposure at ground level in accordance with OET Bulletin No. 65, *Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*.<sup>3</sup> The power density at the base of the tower was calculated using the appropriate procedure contained in Section 2, Supplement A, *Additional Information for Radio and Television Broadcast Stations*, of the Bulletin.

For the calculation, an assumed downward vertical factor of 1.0 was employed with a combined (horizontal and vertical polarization) effective radiated power of 6 kilowatts and radiation center of 100 meters (328 feet) above ground level. It is calculated that the power density

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<sup>2</sup> This existing Section 73.213(c) processing to WKZR(FM) at Milledgeville was indicated in the previous WWWD(FM) application for construction permit.

<sup>3</sup> OET Bulletin 65, Second Edition 97-01, August, 1997.

would not exceed  $0.04 \text{ mW/cm}^2$  at ground level. This is 20 percent of the Commission's guideline value in an uncontrolled environment for a FM radio station.<sup>4</sup> There are no other known emitters in the nearby vicinity.

Access to the transmitting site will be restricted and appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency radiation will not exceed the FCC guidelines.

Charles A. Cooper

December 11, 2003

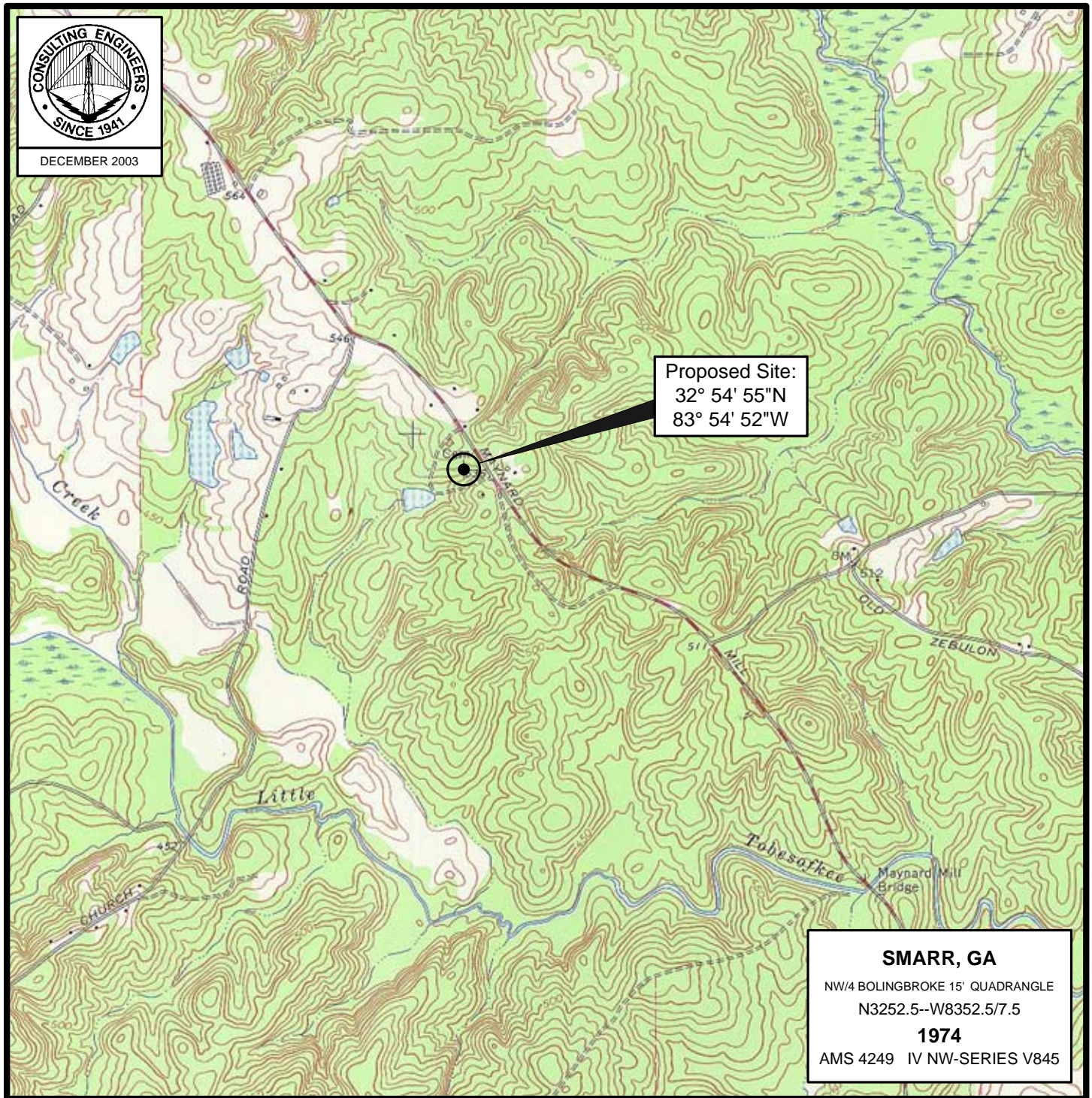
du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
941.329.6000

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<sup>4</sup> The FCC maximum guideline for a FM broadcast station in an uncontrolled environment is  $0.2 \text{ mW/cm}^2$ .



Figure 1

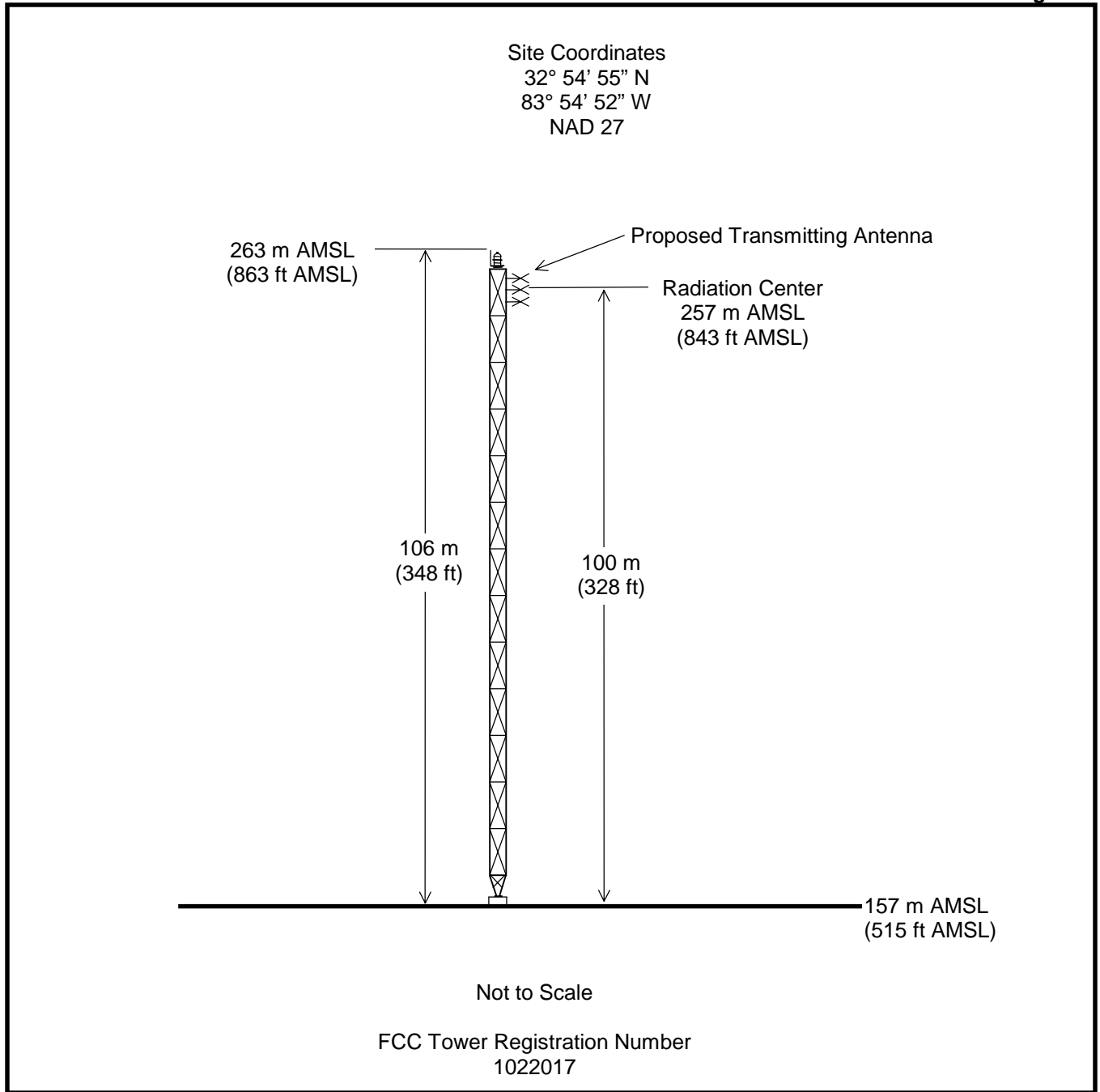


## PROPOSED TRANSMITTER LOCATION

RADIO STATION WWWD(FM)  
BOLINGBROKE, GEORGIA  
CH 271A 6 KW 100 M

du Treil, Lundin & Rackley, Inc., Sarasota, Florida



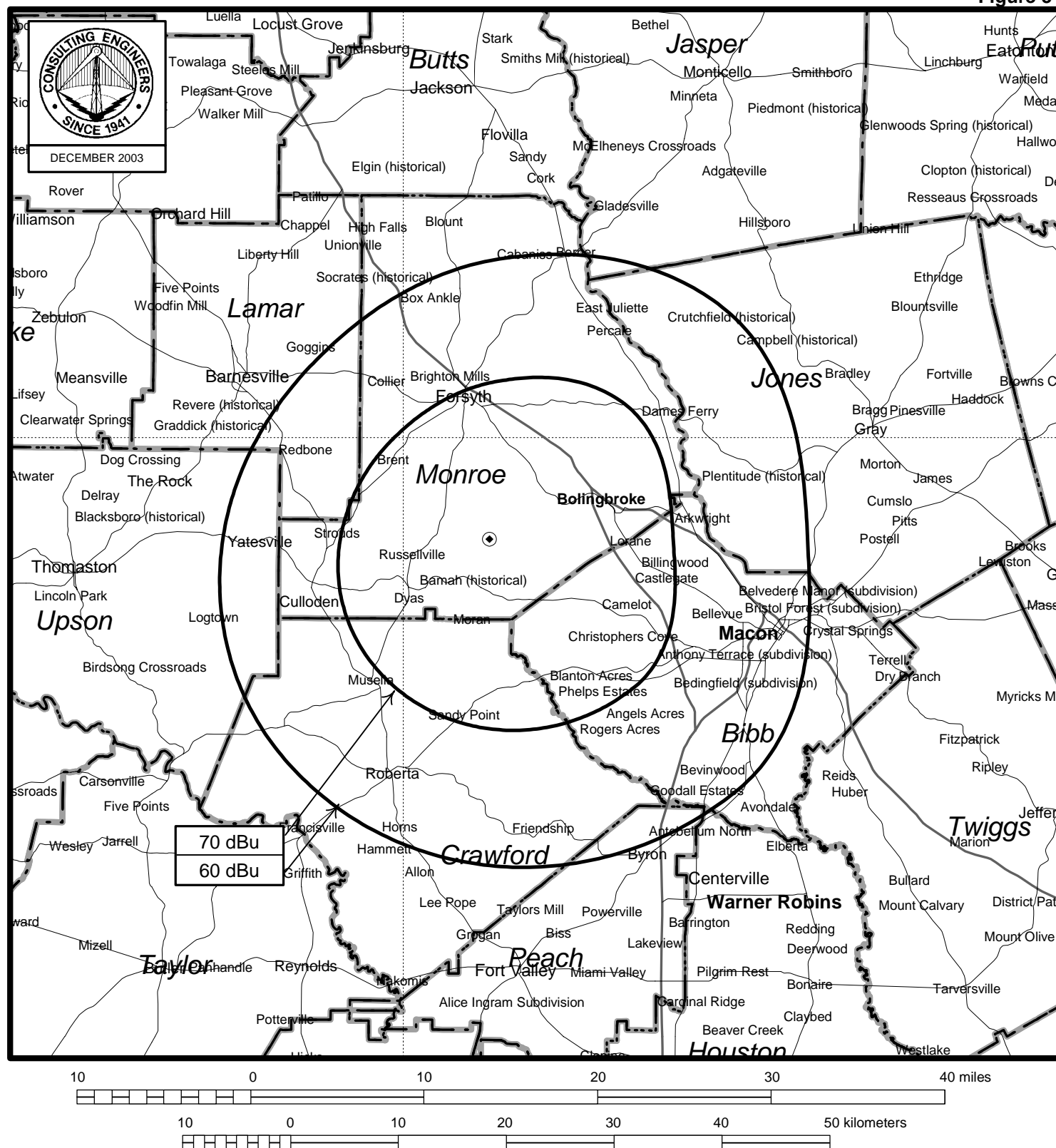


## PROPOSED ANTENNA AND SUPPORTING STRUCTURE

RADIO STATION WWWD(FM)  
 BOLINGBROKE, GEORGIA  
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3



## FCC PREDICTED COVERAGE CONTOURS

RADIO STATION WWWD(FM)  
 BOLINGBROKE, GEORGIA  
 CH 271A 6 KW 100 M

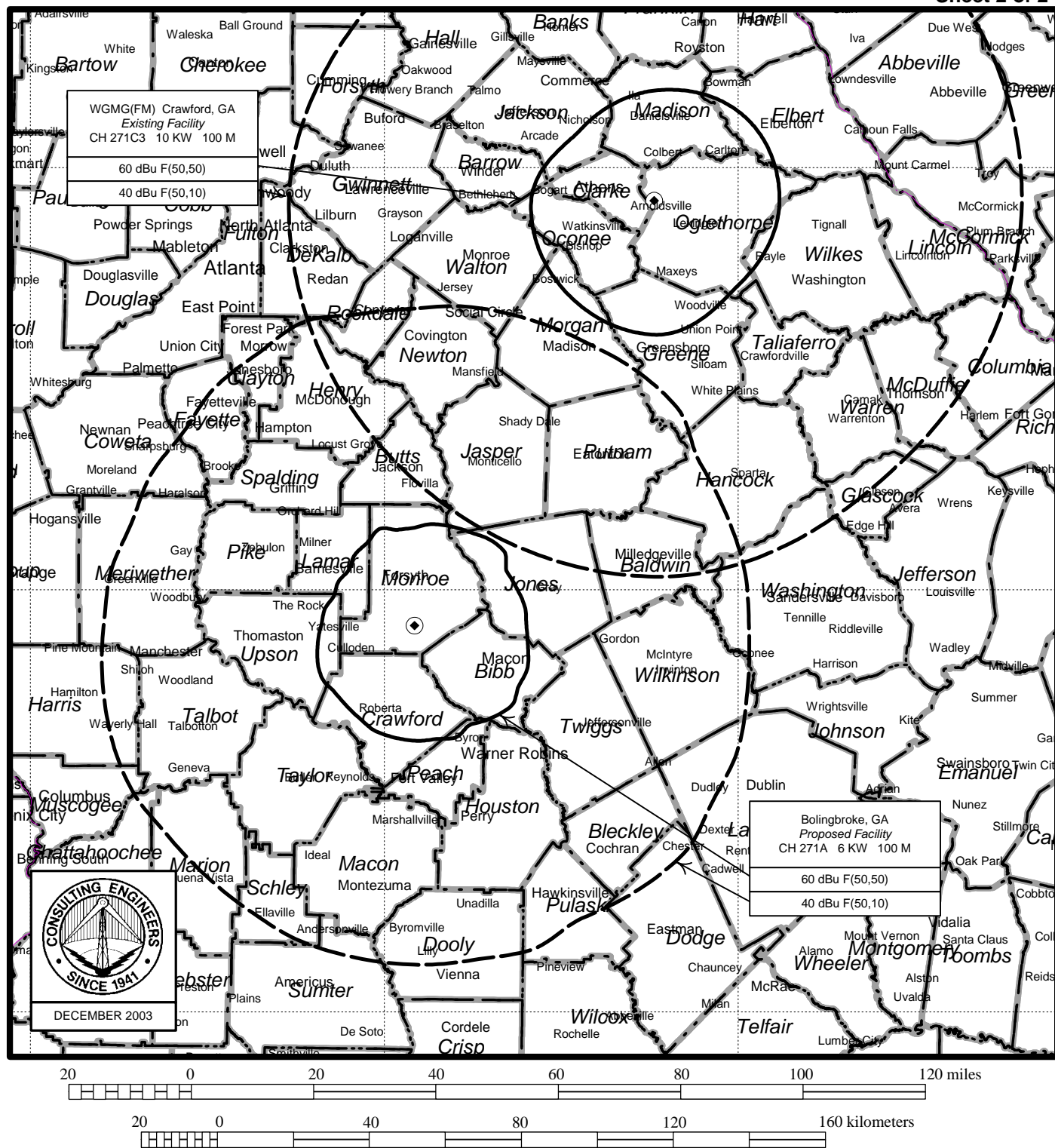
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Channel 271A Allocation Study

32° 54' 55" North Latitude  
83° 54' 52" West Longitude

Call Id	City St	File Status Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
WJTG 32358	FORT VALLEY GA	BLD LIC C 19890228KA	217C1 91.3	100 140	N	32-41-27 083-51-45	N	169.0	25.36	22.0
WKHX-FM 73161	MARIETTA GA	BPH APP C 20020403AAS	268C 101.5	100 329	N	33-48-26 084-20-22	N	338.4	106.54	95.0
WKHX-FM 73161	MARIETTA GA	BLH LIC C 20001030ACG	268C 101.5	100 300	N	33-48-27 084-20-27	N	338.4	106.62	95.0
WRBV 65043	WARNER GA	ROBI BLH LIC C 19950405KC	269A 101.7	4.9 108	N	32-38-19 083-38-33	Y	140.4	39.88	31.0
WJFL 70985	TENNILLE GA	BLH LIC C 19940214KA	270A 101.9	6 100	N	32-54-49 082-53-06	Y	89.8	96.30	72.0
970407 86172	BOLINGBROKE GA	BPH APP C 19970407MP	271A 102.1	0.2 131	N	32-57-39 083-48-48	Y	61.7	10.72	
<i>(Applicant's existing facility.)</i>										
WGMG 48374	CRAWFORD GA	BLH LIC C 19960626KB	271C3 102.1	10 100	N	33-55-18 083-14-14	Y	29.1	128.16	142.0
<i>(Section 73.215 processing requested toward WGMG(FM) at Crawford, Georgia.)</i>										
WKZR 73301	MILLEDGEVILLE GA	BMLH LIC C 19891227KE	272A 102.3	3.3 91	N	33-04-58 083-15-01	N	73.1	64.79	72.0
<i>(Section 73.213(c) processing requested toward WKZR(FM) at Milledgeville, Georgia.)</i>										
WELV-FM 29129	WARNER GA	ROBI BLH LIC C 19940902KC	273A 102.5	4 100	N	32-34-20 083-40-13	Y	149.0	44.40	31.0



## SECTION 73.215 ALLOCATION STUDY

RADIO STATION WWWD(FM)  
BOLINGBROKE, GEORGIA  
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du Treil, Lundin & Rackley, Inc., Sarasota, Florida

## APPENDIX

### MUTUAL UPGRADE AGREEMENT BETWEEN WMVG (AM) AND WWVD (FM)

### **AGREEMENT**

The undersigned parties, George S. Flinn, Jr. (hereinafter "Flinn") and WMVG, Inc. (hereinafter "WMVG"), intending to be legally bound, hereby agree as follows:

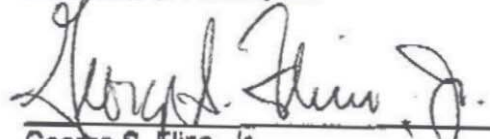
1. Flinn is FCC permittee of unbuilt radio broadcast station WWWD (FM), Bolingbroke, Georgia (Facility ID #86172).
2. WMVG is FCC licensee of WKZR (FM), Milledgeville, Georgia (Facility ID #73301).
3. Both Flinn (permittee of WWWD) and WMVG (licensee of WKZR) have determined that a mutual increase in facilities is desirable to the parties and in the public interest. Section 73.213(c)(2) of the Commission's rules and regulations provides that an exhibit evidencing consent of each short-spaced co-channel, first, second, or third adjacent channel station (for which the requirements of 73.207 are not met) must be filed in connection with any FCC Form 301 or 302-FM which seeks to implement the proposed mutual upgrade.
4. By the signatures of their authorized representatives below, both Flinn and WMVG give their consent to the mutual interference caused by or resulting from the upgrades of the respective facilities.
5. The parties hereto agree to execute, acknowledge and deliver such other and further instruments and documents as may be reasonably necessary to implement, consummate and effectuate the terms of this Agreement and the successful processing by the Commission of the parties' respective modification applications.

6. Acceptance by the FCC of the subject mutual upgrade agreement (and the related construction permit/license modification applications) is in the public interest inasmuch as it will allow significant enhancement of each station's proposed broadcast service area.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their proper representatives thereunto duly authorized this \_\_\_\_ day of January, 2004.


Date: 1-06-04

GEORGE S. FLINN, JR.

  
George S. Flinn, Jr.

WMVG, INC.

Date: 1/6/04

  
Randy Beasley  
President