

**MINOR CHANGE APPLICATION**  
**MILLER COMMUNICATIONS, INC.**  
**WWBD (FM) RADIO STATION**  
**CH 239C3 - 95.7 MHZ - 25.0 KW**  
**BAMBERG, SOUTH CAROLINA**  
**March 2003**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), proposed assignee of FM radio station WWBD, Channel 239A, Bamberg, South Carolina. Miller herein proposes to make changes to WWBD to correct the tower coordinates, implement use of a directional antenna system, increase the power of the station and upgrade the class of WWBD from Class A to Class C3.

At the actual site proposed for the upgrade, Channel 239C3 does not meet the Commission's minimum distance separation requirements to all licensed, proposed or applied for facilities. As such, a clear reference site has been designated, which meets the requirements of §73.207 and from which a 3.16 mV/m contour will be placed over the community of Bamberg. At the proposed site for WWBD, on Channel 239C3, there is a shortspace to WIXV, Savannah, Georgia. Therefore, processing pursuant to 73.215 is respectfully requested. See Exhibit A for details.

Miller proposes to install the antenna for WWBD on an existing tower. This tower has been registered with the FCC and assigned Antenna Structure Registration Number 1047815. However, it was determined that the coordinates of the tower are at variance with the tower

registration. Therefore, the Federal Aviation Administration has been apprised of the coordinate correction and a request for a Determination of No Hazard has been filed with the FAA. Upon receiving the expected determination, the tower registration information will be modified.

Since the WWBD antenna will be located on a tower with an AM station, the worksheets associated with Form 301 could not be used to demonstrate compliance with the Commission's radio frequency radiation limits. Therefore, a study was undertaken to show the proposed WWBD facilities are in compliance with the Commission's RFR rules (Exhibit B).

Due to the co-location of WWBD with WRIT (AM), the AM station will determine operating power by the indirect method during construction. The impedance of WRIT will be monitored and, following construction, an application to return the AM station to direct power measurement will be filed as necessary. All other necessary documentation used to certify the technical portion of FCC Form 301 have been forwarded to the applicant and is available for submission to the Commission upon request.