

# ENGINEERING EXHIBIT

For: PETITION FOR RECONSIDERATION AND  
MOTION FOR LEAVE TO FILE WAIVER REQUEST

Prepared for: Malcolm X Grassroots Movement  
October 19, 2003

Malcolm X Grassroots Movement (“Malcolm X”) seeks reinstatement of its Application (BNPL-20010122AMZ) for an LPFM license at Greenville, South Carolina, and requests Leave to File a subsequent 318 application containing a minor waiver request, using the *fully-spaced* channel and location described below. Malcolm X, whose application had already been Accepted for Filing, was displaced from Channel 293 (106.5mhz), due to a subsequent “move-in” by WGVC (FM) from Newberry to Simpsonville, SC, on first-adjacent Channel 292C3. The move-in resulted in the Malcolm X application being located inside the 70dBu contour of WGVC, and therefore causing interference to the reception of WGVC. A relocation of 8 or more kilometers to the west would be required by Malcolm X to alleviate all interference to WGVC within WGVC’s 70dbu contour. Moreover, this would still result in the stations interfering with each other in otherwise-listenable areas. A *much* better and cleaner solution, therefore, would be to find a fully-spaced channel.

As shown in the attached **Channel Spacing Study**, Channel 238 (95.5mhz) is fully spaced at 34:48:19N; 82:22:22W, to all other authorizations and applications. This new proposed site is just 4.33km south of the Malcolm X application, on a bearing of 188 degrees. This is the closest buildable location found by the applicant. The applicant has firm assurances from the site owner that they can build there. The closest possible fully-spaced location to the Malcolm X application is 2.58km SSW of the site, but being in the middle of a river, this location and the surrounding area is not buildable. Malcolm X therefore requires a minor-waiver of the 2km site-move limitation, for it’s displacement-relief 318 application to be considered as a “minor change”. As discussed in depth in the foregoing narrative, Malcolm X believes that this waiver

**BROWN BROADCAST SERVICES**  
INCORPORATED

Michael D. Brown

3740 S.W. Comus St.

Portland, Oregon 97219-7418

503-245-6065



CHANNEL SPACING STUDY

Brown Broadcast Services, Inc.  
 Job: LPFM GREENVILLE SC MALCOLM X RECON CH238 FINAL.fmj  
 Master Database: 2003\_Sep\_29.fmd  
 Lat: N34:48:19 Lon: W082:22:22 NAD-27  
 Channel: 238 Class: L1  
 Status: Licensed, Construction Permit, Application, Addition  
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF  
 Range: 20 km  
 Comments: No Comments  
 Description:

Page 1 of 1  
 Date: 10/20/2003 12:29:34 AM  
 rfInvestigator-FM Version 2.0.80  
 by rfSoftware, Inc.

Callsign	City	Stat	Latitude (NAD)	Longitude (NAD)	Servi	Channel	Class	Status	Distance	73 207 Min	73 207 Clearance	ERP	Adjacen	HAAT	Bearin	Owner
WWOK-LP	GREENVILLE	SC	N34:56:27	W082:24:47	FM	237 : 95.3 MHz	L1	CP MO	15.48	14	1.48	0.00	1st Adj	342	346	MISSIONARY BROADCAST
WNGR-LP	TIGERVILLE	SC	N35:04:12	W082:22:20	FM	238 : 95.5 MHz	L1	LIC	29.37	24	5.37	0.00	Co-Cha	1	000	NORTH GREENVILLE
NEW	MAULDIN	SC	N34:49:38	W082:17:39	FM	235 : 94.9 MHz	DX	APP	7.59	8	-0.41	0.01	3rd Adj	101	071	TED A MCCALL
NEW	MAULDIN	SC	N34:49:38	W082:17:39	FM	235 : 94.9 MHz	DX	APP	7.59	8	-0.41	0.01	3rd Adj	101	071	TED A MCCALL
WGVC	SIMPSONVILLE	SC	N34:50:33	W082:09:59	FM	292 : 106.3 MHz	C3	LIC	19.33	9	10.33	25.00	IF	100	078	SIMPSONVILLE BROADCAST
NEW	GREENVILLE	SC	N34:55:13	W082:26:17	FM	240 : 95.9 MHz	L1	CP	14.09	0	14.09	0.00	2nd Adj	33	335	FURMAN UNIVERSITY
WXRC	HICKORY	NC	N35:27:16	W081:03:46	FM	239 : 95.7 MHz	C	LIC	139.44	120	19.44	100.00	1st Adj	311	059	PACIFIC BROADCAST
NEW	GREER	SC	N34:56:08	W082:13:38	FM	239 : 95.7 MHz	DX	APP	19.65	15	4.65	0.03	1st Adj	55	043	TED A MCCALL
NEW	GREER	SC	N34:56:08	W082:13:38	FM	239 : 95.7 MHz	DX	APP	19.65	15	4.65	0.03	1st Adj	55	043	TED A MCCALL
NEW	EASLEY	SC	N34:48:33	W082:35:15	FM	235 : 94.9 MHz	DX	APP	19.65	8	11.65	0.03	3rd Adj	45	271	TED A MCCALL

note: Mauldin, SC translator application is fully spaced, using allowable rounding of distances

# BROWN BROADCAST SERVICES

INCORPORATED



Michael D. Brown, President 3740 S.W. Comus St. Portland, Oregon, U.S.A. 97219-7418  
Certified Senior Radio Broadcast Engineer office:503-245-6065 fax:245-5773 e-mail:mike@brownbroadcast.com

## Affirmation:

I, Michael Brown, owner and president of Brown Broadcast Services, Inc., do hereby certify that the material contained in the foregoing Engineering Statement was prepared by me, and that to the best of my ability I believe it to be a true and accurate representation of the facts as evident at the time of the document's preparation.

## Signed:

19 Oct 2003

Michael D. Brown  
Brown Broadcast Services