

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

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is justified in these narrow and unusual circumstances, and would not create a precedent for a flurry of future waiver requests which do not meet these narrow and unusual circumstances.

The *Licensing Requirements and Service* provisions of §73.853(b), regarding the proximity of the transmitter site to the applicant's headquarters and board members, would continue to be met at the new proposed site.

The applicant will *immediately* file a 318 amending application with the waiver requests, channel change, and location change outlined herein, upon grant of it Petition for Reconsideration.

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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 | Adja | 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 BROADC |
| 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 BROA |
| 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

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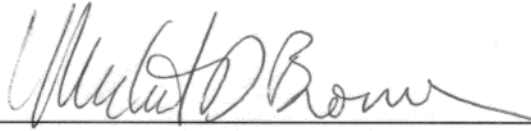


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Affirmation:

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