

MODIFY BPH-20070705ADV
MILLER COMMUNICATIONS, INC.
WWBD (FM) RADIO STATION
CH 240C2 - 95.9 MHZ - 50.0 KW
ISLE OF PALMS, SOUTH CAROLINA
May 2008

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("MCI"), licensee of WWBD, Channel 239C3, Bamberg, South Carolina. MCI also holds an outstanding construction permit for WWBD (BPH-20070705ADV), which authorizes a relocation, an upgrade to Channel 240C2, and a change of community of license from Bamberg, South Carolina to Isle of Palms, South Carolina. MCI herein proposes to modify the outstanding permit by relocating WWBD to a new site with an increase in height above ground, mean sea level, and above average terrain.

MCI is proposing to locate the antenna system for WWBD on a previously approved tower.¹ As such, the Federal Aviation Administration was not apprised of this proposal. The tower has been registered with the Commission and assigned Antenna Structure Registration Number 1263009. At the site for the proposed WWBD facility, Channel 240C2 does not meet §73.207 spacing requirements to one other station, the construction permit for WAVF, Channel 241C2, Forestbrook, South Carolina.² MCI proposes to address this shortspacing issue pursuant to §73.215 of the Commission's rules. See Exhibit A for details.

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- 1) The tower on which the WWBD antenna will be located is also used by AM station WXTC, 1390 kHz, Charleston, South Carolina. The WXTC coordinates have been corrected, and the overall structure height has been updated. An application to correct data for the WXTC array is in progress. It is also noted that the existing tower is to be replaced with a tower of the same height.
 - 2) Since WAVF has been ordered to Channel 241C2 at Forestbrook, South Carolina. The WAVF license at Hanahan, South Carolina is not considered.

The proposed WWBD facility will be co-located on an AM tower. Therefore, the worksheets associated with FCC Form 301 could not be used to certify compliance with the radio frequency radiation limits at the base of the tower. A study has, therefore, been undertaken to show the proposed WWBD facility is compliant with the Commission's RF exposure guidelines (Exhibit B).

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to MCI and is available to the Commission upon request.³

3) For the purposes of environmental analysis, only the radio frequency radiation evaluation was undertaken by Graham Brock, Inc. The applicant has or will review the balance of the environmental reviews (i.e., location of site near areas of historic importance, Indian or tribal areas, etc.).