

**MINOR CHANGE APPLICATION /**  
**ONE STEP UPGRADE**  
**CUMULUS LICENSING LLC**  
**KDVV (FM) RADIO STATION**  
**CH 262C - 100.3 MHZ - 100.0 KW**  
**TOPEKA, KANSAS**  
**September 2010**

**TECHNICAL STATEMENT**

This Technical Statement was prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of radio station KDVV, Channel 262C0, Topeka, Kansas.<sup>1</sup> Cumulus herein submits an application to make minor changes in the facilities of KDVV by proposing to upgrade to Class C at its existing site, and increasing the height above average terrain, above mean sea level and above ground level.

Cumulus proposes to increase the height of the existing tower to implement this proposal. As such, the Federal Aviation Administration was apprised of this proposal. When the anticipated Determination of No Hazard is received, the Antenna Structure Registration will be modified.<sup>2</sup>

At the proposed/existing site, Channel 262C does not meet the Commission's minimum distance separation requirements to one other station. Therefore, a designated allocation reference site for Channel 262C has been identified. Attached as Exhibit A is a demonstration that the proposed Channel 262C allocation site complies with the allocation criteria and §73.207

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- 1) Cumulus held a construction permit for KDVV (BPH-20070320ABX) that specified the same facilities proposed herein. This permit expires September 21, 2010 before the authorized KDVV facilities could be constructed. KDVV will automatically be downgraded to Class C0 when the permit expires.
  - 2) Cumulus had a Determination of No Hazard to increase the height of the existing KDVV tower. However, since the KDVV permit was not constructed, the FAA study also expired on September 21, 2010.

of the Commission's rules. At the implementation site for KDVV, the shortspace to the other facility is addressed pursuant to §73.215 of the rules (Exhibit B).

Due to the location of the KDVV antenna with another high power FM station, the worksheets associated with FCC Form 301 could not be used to show compliance with the Commission's radio frequency radiation exposure limits. Therefore, attached as Exhibit C is a study showing that this proposal is in compliance with the RF limits. All other exhibits used to certify this application were forwarded to Cumulus and are available for submission to the Commission upon request.<sup>3</sup>

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3) The undersigned has evaluated only the radio frequency radiation exposure portion of the environmental review. All data regarding broadcast facilities was extracted from the CDBS database on the date indicated on the spacing studies. We assume no liability for errors or omissions in that database which may be adverse to the request contained herein.