

**MINOR CHANGE APPLICATION/
CHANGE COMMUNITY OF LICENSE
CUMULUS LICENSING LLC
WZAT (FM) RADIO STATION
CH 271C0 - 102.1 MHZ - 100.0 KW
TYBEE ISLAND, GEORGIA
February 2011**

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WZAT, Channel 271C0, Savannah, Georgia. WZAT is licensed to a metro community in the Savannah, Georgia Arbitron market. In addition to WZAT, Cumulus has attributable interest in four other FM stations and two AM stations in the Savannah market. Based on the number of stations, five FM and two AM, there must be a minimum of 45 stations in the market for Cumulus to be in compliance with the rules. However, the number of stations in the Savannah market is only twenty-four, which is less than the number of stations required for a five FM station count. This combination of stations pre-dates the changes to the ownership regulations, which now considers rated and non-rated markets.¹ This combination of stations is, therefore, grandfathered under the rules.

Cumulus herein is submitting, in conjunction with a contingent application for station WTYB, Tybee Island, Georgia,² an application to change the community of license of WZAT to Tybee Island, Georgia, which will allow WTYB to change its community of license to Bluffton, South Carolina. Bluffton, South Carolina is located in Beaufort County, South Carolina, which

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- 1) Under the former contour overlap ownership rules, Cumulus was in compliance with the rules, as there were a sufficient number of stations to allow ownership of five FM stations.
 - 2) Cumulus is also the licensee of WTYB.

is a metro county in the Hilton Head Island, South Carolina Arbitron market. The proposed change of WTYB to Bluffton, South Carolina would remove it from the Savannah market. Thus, Cumulus would become compliant with the ownership rules in the Savannah, Georgia market. As Cumulus has no interest in any other stations in the Hilton Head Island, South Carolina market, it too would be compliant with the ownership rules.³

The proposed city of license change for WZAT uses the one-step application procedure, as outlined in MB Docket #05-210 (released November 29, 2006). As will be shown, the use of Channel 271C0 at the proposed new community of license of Tybee Island, Georgia is mutually exclusive with the authorized WZAT on Channel 271C0 at Savannah, Georgia. There are numerous other operating broadcast facilities licensed to Savannah; therefore, the relocation of WZAT will not deprive the community of its sole service.

Cumulus is proposing to implement this change of community of license at an existing tower site. Therefore, the Federal Aviation Administration ("FAA") was not apprised of this proposal. The tower has been registered with the FCC and assigned Antenna Structure Registration Number 1032655. At the proposed implementation site, Channel 271C0 meets the Commission's minimum distance separation requirements to all other facilities. Exhibit A demonstrates that the proposed Channel 271C0 allotment at Tybee, Island complies with the allocation criteria and §73.207 of the Commission's rules and provides the requisite city grade coverage over 100% of the community.

3) A formal ownership review is attached elsewhere in this submission to the Commission and will demonstrate that WZAT's change would be in compliance with the rules.

As there is a television station co-located with WZAT, the worksheets associated with FCC Form 301 for radio frequency exposure could not be used for certification purposes. Therefore, Exhibit B is a study showing the proposed WZAT is compliant with the Commission's exposure guidelines. Exhibit C contains all of the required exhibits to support the requested city of license change.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Cumulus and is available to the Commission upon request.⁴

4) 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.