

Engineering Exhibit
WBVD Melbourne, FL
Facility ID No: 11409
Capstar TX Limited Partnership
August 11, 2004

This instant application proposes a very minor change to the facilities of WBVD 236A. The present license of WBVD requires a null in the antenna pattern to protect an allocation at Maitland, FL. The need to protect that allocation has changed as a station license has been issued (WPYO) for that allocation to which WBVD is fully spaced utilizing Section 73.207. WBVD seeks a minor modification in its directional antenna by simple adjustment of various elements in the existing antenna to remove this null in its coverage. The antenna will remain at its present location, present height, and only change in very minor ways as directed by the antenna manufacturer to achieve the proposed pattern.

Please note that no construction will be required that should affect AM station WMEL. Made part of this exhibit as Attachment 1 is a letter that was filed with the most recent WBVD license application from Mr. John Harper of WMEL waiving the need for pattern measurements during the original construction of WBVD. Therefore it is requested that no "AM proof condition" be made part of this construction permit, if granted.

73.207 Spacing:

The proposed location of WBVD is fully spaced to all facilities, applications and allocations with the exception of the allocated and constructed facility of station WWRM channel 235 at Tampa, FL.

Spacing Study for 73.207 Spacing

ComStudy 2.2 search of channel 236 (95.1 MHz Class A) at 28-08-15.0 N, 80-42-11.0 W.

Callsign	State	City	Freq	Chnl	ERP_w	Class	Status	Dist_km	Sep	Clr	Notes
WPYO*	FL	MAITLAND	95.3	237	0	C3	RSV	76.8	89	-12	See Licensed WPYO Section 73.215 asked for
WWRM	FL	TAMPA	94.9	235	97300	C	LIC	157.26	165	-7.7	
WPYO	FL	MAITLAND	95.3	237	12000	C3	LIC	88.82	89	-0.2	
WSYR-FM	FL	GIFFORD	94.7	234	50000	C2	CP	72.47	55	17.5	
WSYR-FM	FL	GIFFORD	94.7	234	0	C2	USE	72.47	55	17.5	

73.215 Request:

It is requested that this instant application be granted spacing to station WWRM using Section 73.215.

WBVD will continue to “contour protect” WWRM using a directional antenna. The proposed antenna meets the Commission's requirements for directional antennain Section 73.316. Map 1 is a depiction of this contour protection.

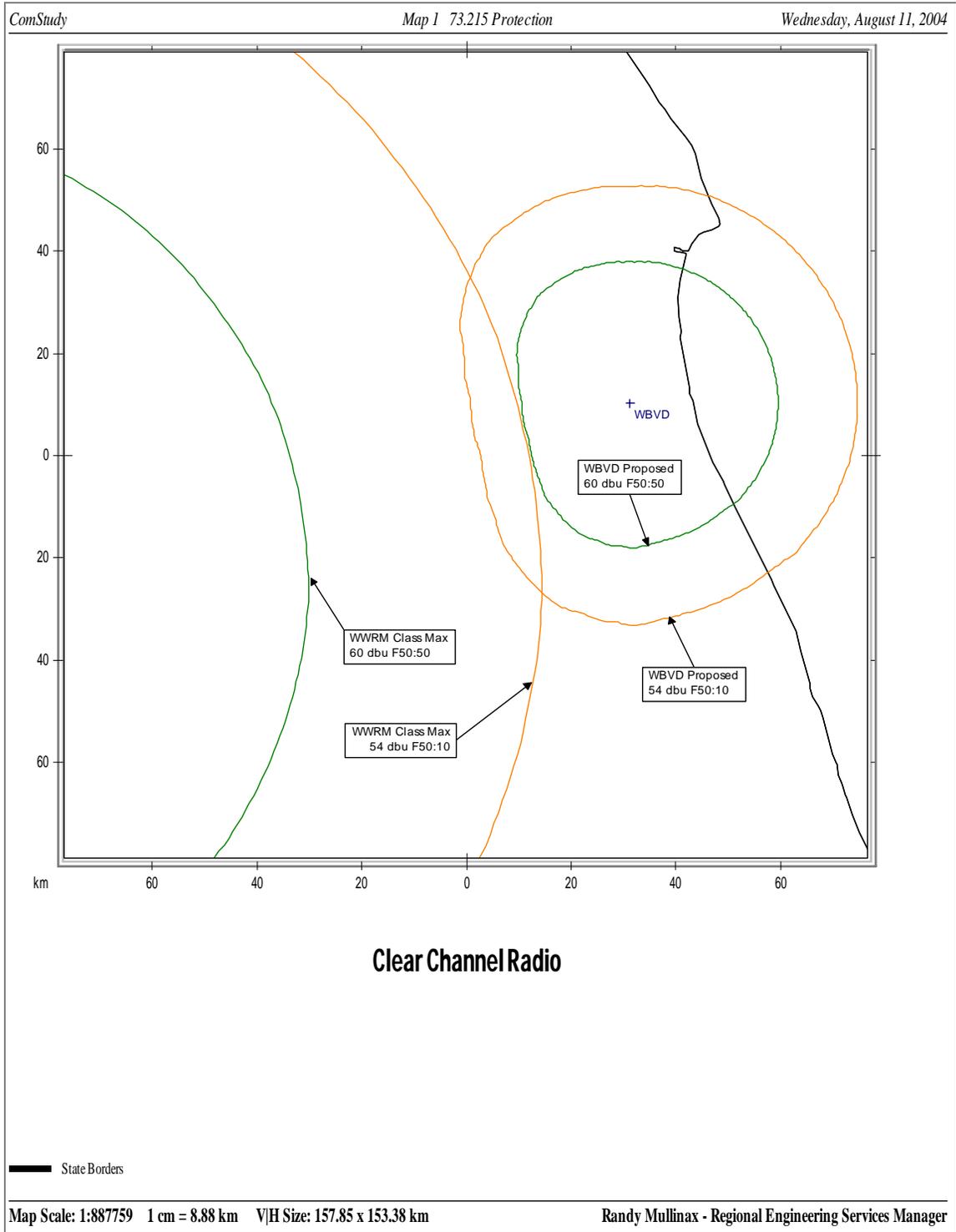
Radio Frequency Radiation Study and Statement:

The Proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, “Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation.”

The antenna system is an EPA type 3, 4 section half-wave spaced antenna, mounted with its center of radiation 116 meters above ground level, and will operate with an effective radiated power of 4.3 kilowatts in both the horizontal and vertical planes. At 2 meters, the height of an average person, at a distance of 50 meters from the base of the tower, this proposal will contribute worst case, 0.046 microwatts per square centimeter, or 0.046 percent of the allowable ANSI limit for controlled exposure, and 0.023 percent of the allowable limit for uncontrolled exposure. At the tower base, power density is even lower. It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that warning signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The site itself is restricted from public access. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

Map 1:
Showing protecting and interfering contours:



Attachment 1



Dear Ms. Latham,

I understand that the FCC has placed a condition on your Construction Permit to move WBVD (BPH-20031017ABI), which requires that you install detuning apparatus on the tower and that you do partial proof of performance measurements on WMEL both before and after the construction. I have discussed this with my engineers and feel that these measures are unnecessary for the following reasons:

1. This is an existing tower and your proposed construction will not increase the height of the tower. The proposed construction will consist of side mounting an FM antenna on the existing structure.
2. The tower is not presently detuned.
3. The tower, located approximately 1.4 km West of the WMEL antenna array is not in the main lobe of either the daytime or nighttime directional pattern of WMEL.
4. Over the years, a number of antennas and transmission lines have been added to this tower with no negative impact upon the WMEL directional antenna system.

Thus, Twin Towers Broadcasting Inc. believes it is unnecessary to conduct proofs on WMEL in connection with the WBVD Construction Permit. Twin Towers Broadcasting Inc. has no objection to your forwarding a copy of this letter to the FCC.

Sincerely,

John Harper

WMEL