

TECHNICAL EXHIBIT

CHANGE OF COMMUNITY OF LICENSE

FORT PIERCE, FLORIDA
JUNO BEACH, FLORIDA

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station WLDI(FM), Fort Pierce, Florida ("WLDI" or the "Station"), in support of an application for a minor modification construction permit specifying operation on channel 238C1 at Juno Beach, Florida, in lieu of the current license for operation on channel 238C1 (same channel) at Fort Pierce, Florida.

As the requested change is mutually exclusive with the Station's current allotment, this modification is appropriately requested on a minor modification application. See 47 C.F.R. Sections 73.203(a), 73.3573(a)(i) and 73.3573(g).

The following is a summary of the merits of this reallocation proposal:

- The community of Juno Beach, Florida (2000 Census population 3,262 persons) will be provided with its first local aural transmission service.
- The community of Fort Pierce, Florida (2000 Census population 37,516 persons) will continue to have multiple local aural transmission services.
- The proposed channel 238C1 allotment site at Juno Beach, Florida, satisfies the Commission's allocations spacing rules for a fully spaced, 100 kW Class C1 facility.¹

¹ The proposed allotment reference coordinates are 27° 07' 19" North, 80° 23' 20" West. See this Exhibit under the heading "Compliance With FCC Rules" for details on allocations considerations with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

- There is no gain or loss area associated with this proposal because no physical facilities change is proposed herein.

Table of Figures Accompanying this Exhibit

Figure 1	WLDI(FM) Channel 238C1 Spacing Study at Allocations Site
Figure 2	WLDI(FM) Channel 238C1 Present and Proposed 60 dBu Service
Figure 3	WLDI(FM) Channel 238C1 Present and Proposed 70 dBu Service
Figure 4	Map of Protected Service to Proposed Community of License
Figure 5	Table of Protected Service to Proposed Community of License

Proposed Community Change

Fort Pierce, Florida, is located in St. Lucie County, Florida, and has a 2000 U.S. Census population of 37,516 persons. Fort Pierce would continue to be served by multiple local aural transmission services, including AM stations WJNX and WIRA, and FM stations WQCS and WJFP.

Juno Beach, Florida, is located in Palm Beach County, Florida, and has a 2000 U.S. Census population of 3,262 persons. Via this proposal, Juno Beach will be provided with it's first local aural transmission service.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 238C1 at Juno Beach, Florida. The allotment reference site complies with

the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments as a full 100 kW Class C1 allotment, except for the Station's existing channel 238C1 allotment at Fort Pierce, Florida, for which this proposal is a mutually exclusive substitute, and stations electing short spacing to WLDI pursuant to the provisions of 47 C.F.R. 73.215.

Operation from the proposed site would provide the requisite city grade (70 dBu) signal to all of Juno Beach.² Figure 3 is a map which depicts the community grade coverage (70 dBu) contour based on maximum class C1 facilities (ERP 100 kW/HAAT 299 meters) at the proposed allotment site. As shown, all (100%) of Juno Beach is located within the 70 dBu city grade contour.

Urbanized Area Considerations

Three separate Urbanized Areas receive some service from channel 238C1. Urbanized area coverage is unchanged by this proposed modification.

<u>Urbanized Area</u>	<u>Percent Coverage</u>
Vero Beach, FL	91%
Fort Pierce, FL	100%
Stuart, FL	100%
West Palm Beach - Boca Raton - Delray Beach, FL	28%

60 dbu Service and Gain and Loss Areas

There is no facilities change proposed herein, thus, there is no 60 dBu Service Gain or Loss Area associated with this proposal.

² See Figure 3 herein.

Proposed 70 dbu Service

There would be 589,171 persons residing within the proposed 70 dBu contour as calculated from the proposed allotment reference site and based on maximum Class C1 facilities; the area within the proposed 70 dBu contour would be 7,844 square kilometers.

Protected Service to Proposed Community of License

Juno Beach, Florida, the proposed community of license, currently receives protected aural service from 48 radio stations, as shown in *Figures 4 and 5* (counting those stations which provide protected service to at least 80 percent of the area of the community of license).

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions. The AM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.182.

Population and Area

The population within the service contours was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids." The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

The community of license of WLDI may be changed from Fort Pierce, Florida, to Juno Beach, Florida, with continued operation on channel 238C1, in compliance with all applicable Commission rules. (a) the community of Fort Pierce, Florida would continue to be provided with local aural transmission service, (b) a first local aural

transmission service would be provided to Juno Beach, Florida, and (c) the community of Fort Pierce, Florida would continue to be served by aural transmission services from multiple other radio stations. Therefore, the applicant requests a construction permit for the minor modification of the license to operate WLDI to specify Juno Beach, Florida as the community of license, in lieu of Fort Pierce, Florida.

Respectfully submitted,

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Licenses, Inc.
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Figure 1

Spacing Study at Allocation Site

ComStudy 2.2 search of channel 238 (95.5 MHz Class C1) at
27-07-19.0 N, 80-23-20.0 W.

ComStudy 2.2 search of channel 238 (95.5 MHz Class C1) at 27-07-19.0 N, 80-23-20.0 W³.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WOLZ	FORT MYERS	FL 237 C1	153.53	177.00	250.7	-23.5 ⁴
WOLZ	FORT MYERS	FL 237 C1	160.89	177.00	245.1	-16.1 ⁵
WXDJ	NORTH MIAMI BEACH	FL 239 C2	150.59	158.00	172.4	-7.4 ⁶
WXDJ	NORTH MIAMI BEACH	FL 239 C2	154.74	158.00	174.3	-3.3 ⁷
WXDJ	NORTH MIAMI BEACH	FL 239 C2	154.74	158.00	174.3	-3.3 ⁸
WXDJ	NORTH MIAMI BEACH	FL 239 C2	157.59	158.00	171.5	-0.4 ⁹
941208MC	SEBASTIAN	FL 240 C3	77.40	76.00	354.1	1.4
WSJZ-FM	SEBASTIAN	FL 240 C3	80.49	76.00	343.5	4.5
WOLZ	FORT MYERS	FL 237 C1	183.43	177.00	254.7	6.4
WNEW	JUPITER	FL 292 C3	33.74	24.00	127.0	9.7
WSJZ-FM	SEBASTIAN	FL 240 C3	86.63	76.00	349.0	10.6
WGSE-LP	SEBRING	FL 239 LP100	113.42	100.00	292.7	13.4
WNEW*	JUPITER	FL 292 C3	40.93	24.00	135.6	16.9
WNEW	JUPITER	FL 292 C3	47.34	24.00	139.0	23.3
WCPL-LP	MERRITT ISLAND	FL 238 LP100	140.18	111.00	347.4	29.2
WBVD	MELBOURNE	FL 236 A	107.96	75.00	349.0	33.0
	OKEECHOBEE	FL 291 A	56.37	22.00	295.8	34.4
W236AO	PORT ST. LUCIE	FL 236 D	34.83	0.00	4.5	34.8
WMGE	MIAMI BEACH	FL 235 C0	129.18	94.00	172.0	35.2
WMGE	MIAMI BEACH	FL 235 C0	129.18	94.00	172.0	35.2
W291AL	FORT PIERCE	FL 291 D	39.01	0.00	348.8	39.0
WBVD	MELBOURNE	FL 236 A	114.11	75.00	349.9	39.1

³ A completely fully spaced reference site, unencumbered by stations electing 73.215 against WLDI, exists at 27-11-37 N, 80-14-45 W.

⁴ Auxiliary facility

⁵ WOLZ elected 73.215 status at this location with respect to WLDI. WLDI maintains its fully spaced status with respect to WOLZ.

⁶ WXDJ elected 73.215 status at this location with respect to WLDI. WLDI maintains its fully spaced status with respect to WXDJ.

⁷ BXLH20061011AAF Auxiliary facility.

⁸ BXPB20050321AQA Auxiliary facility.

⁹ WXDJ Allotment site, rounds to 0.0 km clear.

Figure 2
Present and Proposed 60 dBu Service

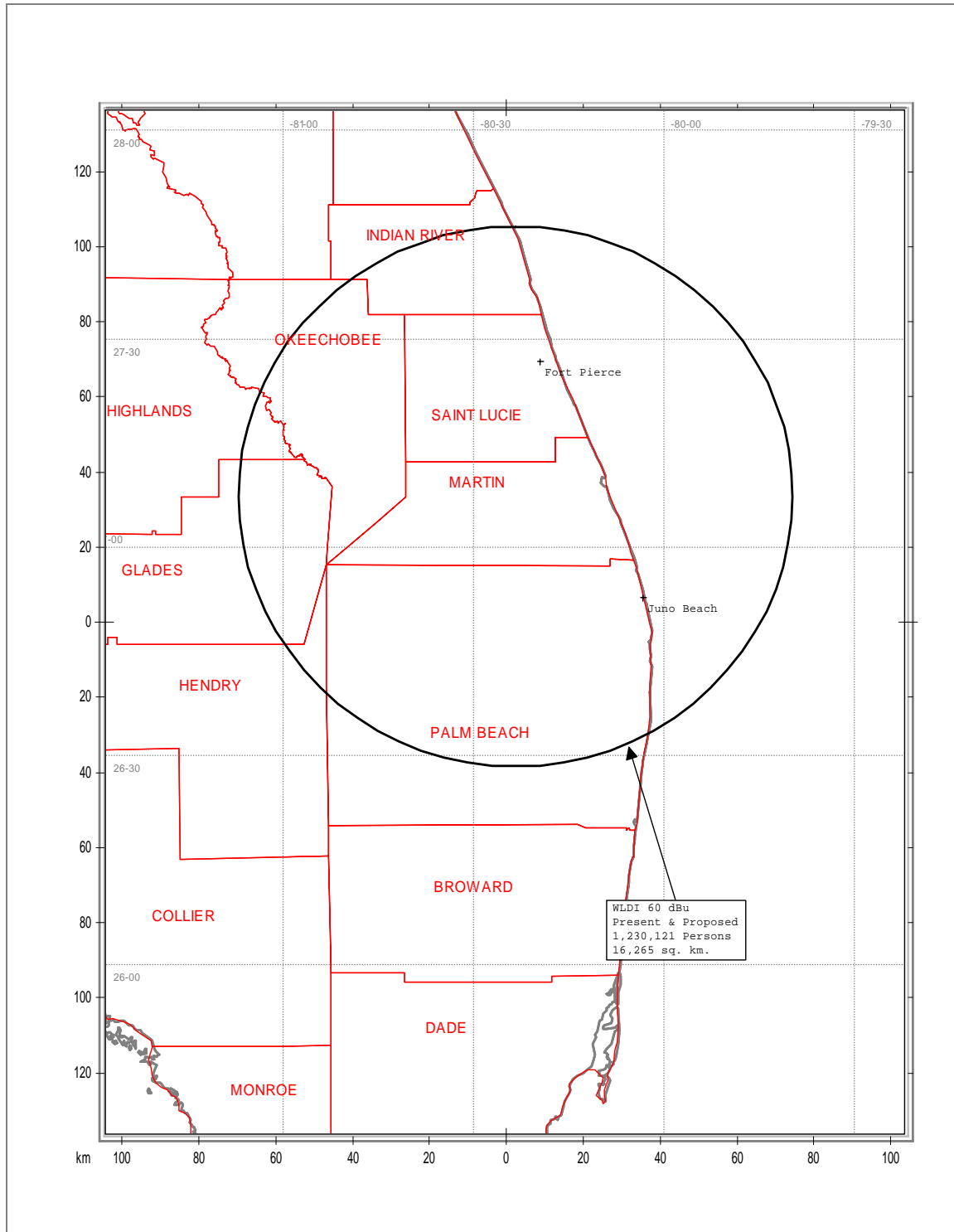


Figure 3
Present and Proposed 70 dBu Service

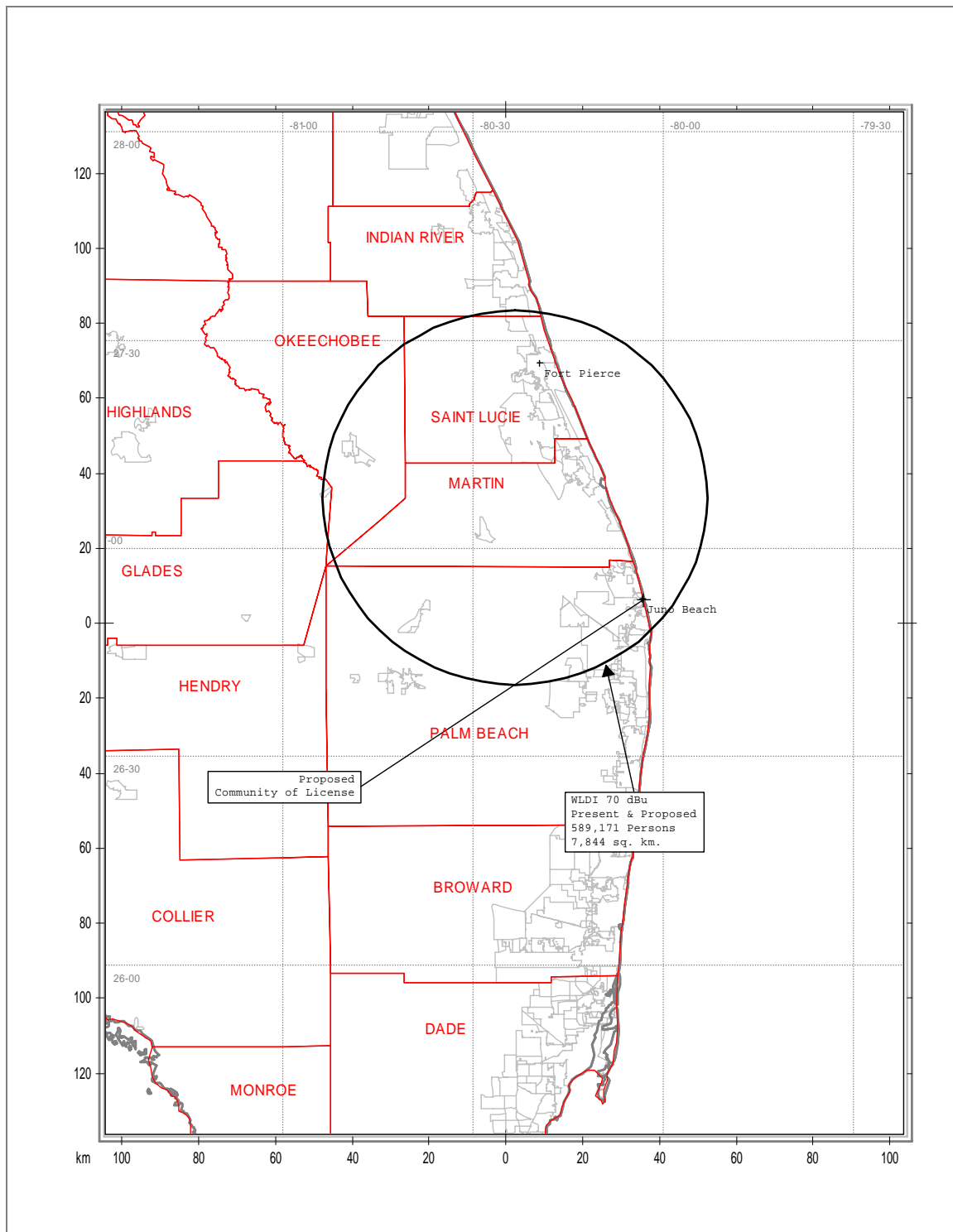


Figure 4
Map of Protected Service to Proposed Community of License

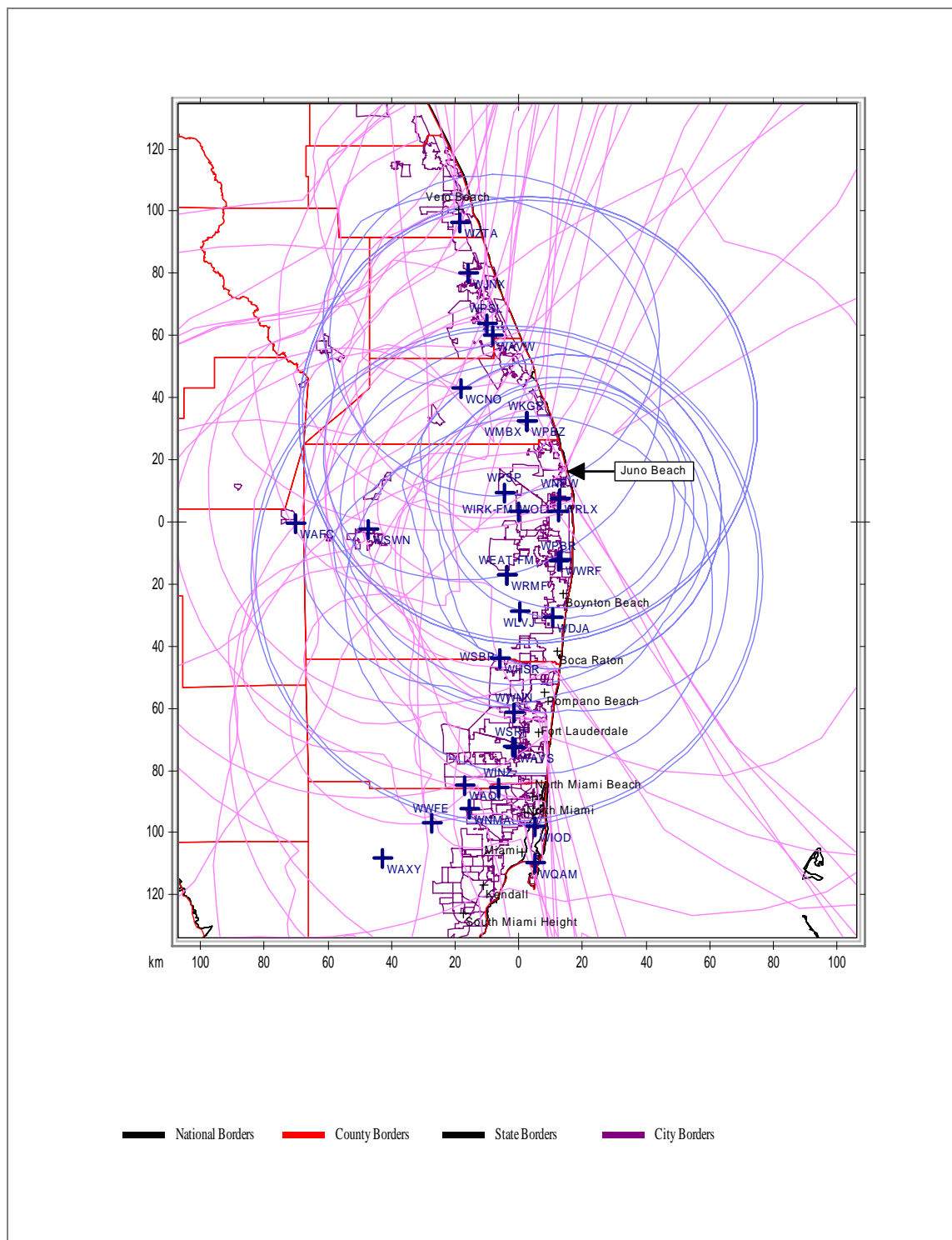


Figure 5

Table of Protected Service to Proposed Community of License

Count	Call Sign	Facility_id	City	State
	WNMA	61642	MIAMI SPRINGS	FL
	WINZ	51977	MIAMI	FL
	WWFE	21391	MIAMI	FL
	WAXY	30837	SOUTH MIAMI	FL
	WAQI	37254	MIAMI	FL
	WIOD	14242	MIAMI	FL
	WQAM	64002	MIAMI	FL
	WWRF	24461	LAKE WORTH	FL
	WDJA	54038	DELRAY BEACH	FL
			ROYAL PALM	
	WPSP	23822	BEACH	FL
	WJBW	32963	JUPITER	FL
	WAVS	58309	DAVIE	FL
	WPBR	50333	LANTANA	FL
			FORT	
	WSRF	67194	LAUDERDALE	FL
			NORTH PALM	
	WSVU	129188	BEACH	FL
	WMNE	73892	RIVIERA BEACH	FL
	WLVJ	4341	BOYNTON BEACH	FL
	WSWN	59660	BELLE GLADE	FL
	WWNN	73930	POMPANO BEACH	FL
	WEFL	35148	TEQUESTA	FL
	WJNO	1917	WEST PALM BEACH	FL
	WHSR	27420	POMPANO BEACH	FL
	WSBR	60634	BOCA RATON	FL
	WAFC	24229	CLEWISTON	FL
	WFTL	29490	WEST PALM BEACH	FL
	WBZT	20439	WEST PALM BEACH	FL
			ROYAL PALM	
	WMEN	61080	BEACH	FL
	WSTU	74076	STUART	FL
	WJNX	20437	FORT PIERCE	FL
	WZTA	41067	VERO BEACH	FL
	WPSL	53044	PORT ST. LUCIE	FL
	WRLX	20442	WEST PALM BEACH	FL
	WEAT-FM	29567	WEST PALM BEACH	FL
	WIRK-FM	1918	WEST PALM BEACH	FL
	WXEL	58363	WEST PALM BEACH	FL
	WOLL	32969	HOBE SOUND	FL
	WZZR	36544	RIVIERA BEACH	FL
	WRMB	43686	BOYNTON BEACH	FL
	WAYF	61507	WEST PALM BEACH	FL
	WRMF	20436	PALM BEACH	FL

WNEW	24143	JUPITER	FL
WPBZ	1246	INDIANTOWN	FL
WAVW	14376	STUART	FL
WKGR	1245	FORT PIERCE	FL
WMBX	25756	JENSEN BEACH	FL
WCNO	47554	PALM CITY	FL