

**MINOR CHANGE APPLICATION**  
**TEL-DODGE BROADCASTING, INC.**  
**WMCG (FM) RADIO STATION**  
**CH 285C2 - 104.9 MHZ - 49.0 kW**  
**MILAN, GEORGIA**  
**October 2015**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Tel-Dodge Broadcasting, Inc. ("Tel-Dodge"), licensee of WMCG, Channel 285C2, Milan, Georgia. Tel-Dodge herein proposes to make minor changes to the WMCG facility by relocating the transmitter site.

Tel-Dodge is proposing to relocate the WMCG to an existing tower structure which is registered with the FCC under Antenna Structure Registration Number 1220512. As such the FAA was not been notified of this proposal.

At the proposed site, Channel 285C2 complies with the minimum distance separation requirements under §73.207 of the Commission's rules as noted in Exhibit A.

It is noted that the 70 dBu contour from the proposed WMCG site, based on the Commission's standard propagation model, does not reach the community of Milan, Georgia. Exhibit B is a supplemental showing that demonstrates that, by using an alternative prediction method, this proposal is in compliance with the rules regarding city grade coverage of the community of license.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to Tel-Dodge and is available to the Commission upon request.<sup>1</sup>

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

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**EXHIBIT A**

**Clearance Study for WMCG Milan, Georgia**  
**Using Proposed Site as Reference**

REFERENCE					DISPLAY DATES		
32 22 59.0 N.				CLASS = C2	DATA	10-09-15	
83 07 08.0 W.				Current Spacings to 3rd Adj.	SEARCH	10-09-15	
----- Channel 285 - 104.9 MHZ -----							
Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
WMCG	LIC	285C2 Milan		GA	205.8	32.26	189.5 -157.2
32 07 16.0	83 16 05.0	C	36.000 kW	172 M			
Tel-dodge Broadcasting, In BLH19940310KB							
WROK-FM	LIC-Z	288C3 Macon		GA	325.8	69.04	55.5 13.5
32 53 48.0	83 32 05.0	ZC	6.100 kW	201 M			
Joule Broadcasting Llc BLH20010208AAB							
WFXE	LIC	285A Columbus		GA	273.4	182.44	165.5 16.9
32 27 59.0	85 03 22.0	CX	2.300 kW	164 M			
Davis Broadcasting, Inc. O BLH20111128HCC							
WFSH-FM	LIC	284C1 Athens		GA	338.4	177.43	157.5 19.9
33 52 02.0	83 49 44.0	CX	24.000 kW	505 M			
South Texas Broadcasting, BMLH20060726APQ							
WKUB	LIC	286C2 Blackshear		GA	152.2	150.43	129.5 20.9
31 10 54.0	82 22 51.0	CX	50.000 kW	106 M			
Mattox Broadcasting, Inc. BLH20070329AJX							
WTHG	LIC	284C3 Hinesville		GA	114.0	142.60	116.5 26.1
31 51 18.0	81 44 28.0	C	12.000 kW	143 M			
Wrgo-fm Radio Llc D/b/a Sa BLH19931210KC							
WLHH	LIC	285C3 Ridgeland		SC	87.8	206.65	176.5 30.2
32 26 10.0	80 55 23.0	C	16.000 kW	125 M			
Apex Broadcasting, Inc. BLH19940705KC							
WHTF	LIC	285C2 Havana		FL	208.2	225.73	189.5 36.2
30 35 11.0	84 14 11.0	CN	47.000 kW	154 M			
Red Hills Broadcasting, Ll BLH19930816KD							
WLHH	CP	285C2 Ridgeland		SC	90.8	234.60	189.5 45.1
32 19 51.0	80 37 38.0	CX	50.000 kW	150 M			
Apex Broadcasting, Inc. BPH20140424AAC							

All separation margins include rounding.  
It is noted that any reference to the proposed operation of Channel 286A, Wadley, Georgia has been removed. Reference FCC Letter of October 5, 2015 (1800B3-DD).

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**EXHIBIT B**

**Technical Statement for City Grade Coverage**  
**Using Supplemental City Grade Analysis**

The WMCG city grade contour does not provide the necessary level of signal to the community of Milan, Georgia using the normal FCC predicted 70 dBu contour of the station. Tel-Dodge herein submits a study demonstrating that, using a supplemental analysis, the community of Milan is within the predicted Longley-Rice 70 dBu contour, in compliance with §73.315(a) of the rules.

The community of Milan is located approximately 42.2 kilometers on a bearing of 172 degrees True North of the proposed WMCG transmitter site. Using the Commission's standard method of predicting city grade coverage, as outlined in §73.313 of the Commission's rules, the predicted 3.16 mV/m contour does not reach the community of Milan. In this particular case, however, we find a supplemental method of depicting city grade coverage is appropriate, as noted in §73.313(e) of the Commission's rules.

The proposed WMCG facility will be located on an existing tower at geographic coordinates North Latitude 32° 22' 59" and West Longitude 83° 07' 08" and operate with a

maximum effective radiated power of 49.0 kilowatts with a center of radiation 244.9 meters above mean sea level. Milan is located on bearings between 167° and 177° True from the proposed WMCG site. We have analyzed the terrain in 1.0° increments (30 second FCC terrain database) including a direct bearing to the city at 172.0°. A depiction of the terrain profile at 172.0° is attached as Exhibit B4.

We have determined the location of the 70 dBu contour, using the Longley-Rice prediction method mean occurrence, as implemented in the V-Soft program Probe-4. This model is a more representative prediction of field strength than the FCC standard methodology.

On the pertinent bearings toward the proposed main studio, we tabulated the distance to the city grade contour, using the FCC method (Exhibit B2) and supplemental method to demonstrate the differences in the distances to the contour. We found the supplemental depiction distances are greater (in excess of 10%) than the distances using the Commission's standard methodology. Based on the Staff's policy, as the supplemental method exceeds the standard method by more than 10%, the supplemental showing is acceptable. Therefore, pursuant to §73.313(e) of the Commission's rules, a supplemental method of depicting the city grade coverage is warranted.

Using the supplemental method calculations, we find the city grade contour in the direction of the city extends out a minimum distance of **20.1** kilometers and a maximum of **29.8** kilometers, which is well beyond the far city boundary of Milan, as visually demonstrated in Exhibit B3.

Based on the supplemental depiction, we find the proposed WMCG facility adequately serves the community of Milan and is in compliance with §73.315(a) of the Commission's rules.

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**EXHIBIT B1**

North Latitude: 32° 22' 59"  
 West Longitude: 83° 07' 08"

HAAT and Distance to Contour - FCC 30 second terrain database

Azi.	AV EL	HAAT	ERP kW	dBk	Field	70-F5	60-F5
000	82.7	162.2	49.0000	16.90	1.000	33.77	53.54
045	67.8	177.1	49.0000	16.90	1.000	35.27	55.15
090	97.6	147.3	49.0000	16.90	1.000	32.14	51.65
135	107.6	137.3	49.0000	16.90	1.000	31.06	50.27
180	103.6	141.3	49.0000	16.90	1.000	31.49	50.83
225	94.1	150.8	49.0000	16.90	1.000	32.54	52.12
270	96.3	148.6	49.0000	16.90	1.000	32.30	51.83
315	96.9	148.0	49.0000	16.90	1.000	32.23	51.75

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 Additional Radials:

167	100.8	144.1	49.0000	16.90	1.000	31.79	51.21
168	101.7	143.2	49.0000	16.90	1.000	31.70	51.10
169	102.5	142.4	49.0000	16.90	1.000	31.61	50.98
170	103.5	141.4	49.0000	16.90	1.000	31.50	50.84
171	104.3	140.6	49.0000	16.90	1.000	31.42	50.74
172	104.6	140.3	49.0000	16.90	1.000	31.38	50.69
173	104.6	140.3	49.0000	16.90	1.000	31.39	50.70
174	104.5	140.4	49.0000	16.90	1.000	31.39	50.70
175	104.5	140.4	49.0000	16.90	1.000	31.39	50.70
176	104.5	140.4	49.0000	16.90	1.000	31.40	50.71
177	104.7	140.2	49.0000	16.90	1.000	31.37	50.68

AMSL= 244.9 M

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**EXHIBIT B2**

**Tabulation of City Grade Contours in Arc**  
**Toward Milan**

Location of 70 dBu

Azi.	FCC Method (F)	Longley-Rice (LR)	% Change	Method
				Used
167	31.79	44.50	+40.0	LR
168	31.70	45.94	+44.9	LR
169	31.61	46.42	+46.9	LR
170	31.50	45.99	+46.0	LR
171	31.42	44.51	+41.7	LR
# 172	31.38	44.95	+43.2	LR
173	31.39	47.44	+51.1	LR
174	31.39	44.95	+43.2	LR
175	31.39	47.07	+50.0	LR
176	31.40	47.07	+49.9	LR
177	31.37	46.80	+49.2	LR

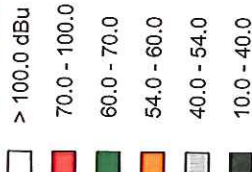
# - City Radial



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

**WMCG - Milan, GA - Proposed**  
 Latitude: 32-22-59 N - Longitude: 083-07-08 W  
 Channel: 285 - Frequency: 104.9 MHz  
 ERP: 49.00 kW - AMSL Height: 244.9 m



Scale 1:750,000



V-Soft Communications LLC ©

**EXHIBIT B3**  
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