

TECHNICAL EXHIBIT

CHANGE OF COMMUNITY OF LICENSE

JACKSONVILLE, FLORIDA
GREEN COVE SPRINGS, FLORIDA

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station WPLA(FM), Jacksonville, Florida ("WPLA" or the "Station"), in support of a application for a minor modification construction permit specifying operation on channel 297C1 at Green Cove Springs, Florida, in lieu of the current license for operation on channel 297C1 (same channel) at Jacksonville, Florida. This application is being filed contingently along with the concurrently-filed application for a construction permit for the minor modification of Station WJBT(FM), Green Cove Springs, Florida ("WJBT") for change of community of license of WJBT to Hastings, 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 Green Cove Springs, Florida (2000 Census population 5,378 persons) will continue to be provided with local aural transmission service.
- The community of Jacksonville, Florida (2000 Census population 735,716 persons) will continue to have a multitude of local aural transmission services.
- The proposed channel 297C1 allotment site at Green Cove Springs, Florida, satisfies the Commission's

allocations spacing rules for a fully spaced, 100 kW Class C1 facility.¹

- This proposal involves no change in WPLA's technical facility, so there are no 60dBu gain or loss areas.

Table of Figures Accompanying this Exhibit

Figure 1	WPLA(FM) Channel 297C1 Spacing Study at Allocations Site
Figure 2	WPLA(FM) Channel 297C1 Present and Proposed 60 dBu Service
Figure 3	WPLA(FM) Channel 297C1 Present and Proposed 70 dBu Service
Figure 4	Map of services to proposed community of Green Cove Springs
Figure 5	Table of services to proposed community of Green Cove Springs

¹ The proposed allotment reference coordinates are 42° 52' 10" North, 106° 18' 36" 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.

Proposed Community Change

Jacksonville, Florida, is located in Duval County, Florida, and has a 2000 U.S. Census population of 735,617 persons. Jacksonville would continue to be served by a multitude of local aural transmission services.

Green Cove Springs, Florida, is located in Clay County, Florida, and has a 2000 U.S. Census population of 5,378 persons. Together with the contingent application to modify WJBT, this application will ensure that Green Cove Springs continues to be served by a local aural transmission service, while Hastings, Florida would obtain its first local aural transmission service.

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 297C1 at Green Cove Springs, 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 297C1 allotment at Jacksonville, Florida, for which this proposal is a mutually exclusive substitute.

Operation from the channel 297C1 reference site would provide the requisite city grade (70 dBu) signal to all of Green Cove Springs.² *Figure 3* is a map which depicts the community grade coverage (70 dBu) contour based on Class C1 facilities (ERP 100 kW/HAAT 299 meters) at the proposed allotment site. As shown, all (100%) of Green Cove Springs is located within the 70 dBu city grade contour.

² See *Figure 3* herein.

Urbanized Area Considerations

The Station's present 297C1 70 dBu contour encompasses 100% of the population and 100% of the area of the town of Green Cove Springs.

60 dbu Gain and Loss Areas

There are no gain or loss areas connected with this application since the licensed technical facility of WPLA will not change. The WPLA 60 dbu service area will continue to encompass 1,208,959 persons.

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.

Population and Area

The population within the FM primary service contour (1 mV/m or 60 dBu) 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 WPLA may be changed from Jacksonville, Florida, to Green Cove Springs, Florida, with continued operation on channel 297C1, in compliance with all applicable Commission rules. In conjunction with the contingent application to modify WJBT from Green Cove Springs, Florida, to Hastings, Florida: (a) the community of Green Cove Springs, Florida would continue to be provided with a local aural transmission service, (b) a first local aural transmission service would be provided to Hastings, Florida, and (c) the community of Jacksonville, Florida would continue to be served by local aural transmission services from multiple other radio stations.

Channel 297C1, Jacksonville, FL and Green Cove Springs, FL

Therefore, the applicant requests a construction permit for the minor modification of the license to operate WJBT to specify Green Cove Springs, Florida as the community of license, in lieu of Jacksonville, Florida.

Figure 1

Spacing Study at Allocation Site

Call Sign	State	City	Freq	Chael	ERP_w	Class	Status	Dist_km	Sep	Clr
WPLA	FL	JACKSONVILLE	107.3	297	98000	C1	LIC	0	50	0
	FL	JASPER	107.5	298	0	A	APP	136.98	133	4
	GA	PATTERSON	107.1	296	0	A	APP	132.85	133	-0.1
WHFX	GA	DARIEN	107.7	299	50000	C2	LIC	98.53	79	19.5
WMCD	GA	CLAXTON	107.3	297	25000	C3	LIC	211.49	211	0.5
WXGL	FL	ST. PETERSBURG	107.3	297	100000	C1	LIC	269.86	245	24.9
WXGL	FL	ST. PETERSBURG	107.3	297	100000	C0	CP	260.15	259	1.1

Figure 2
Present and Proposed 60 dBu Service

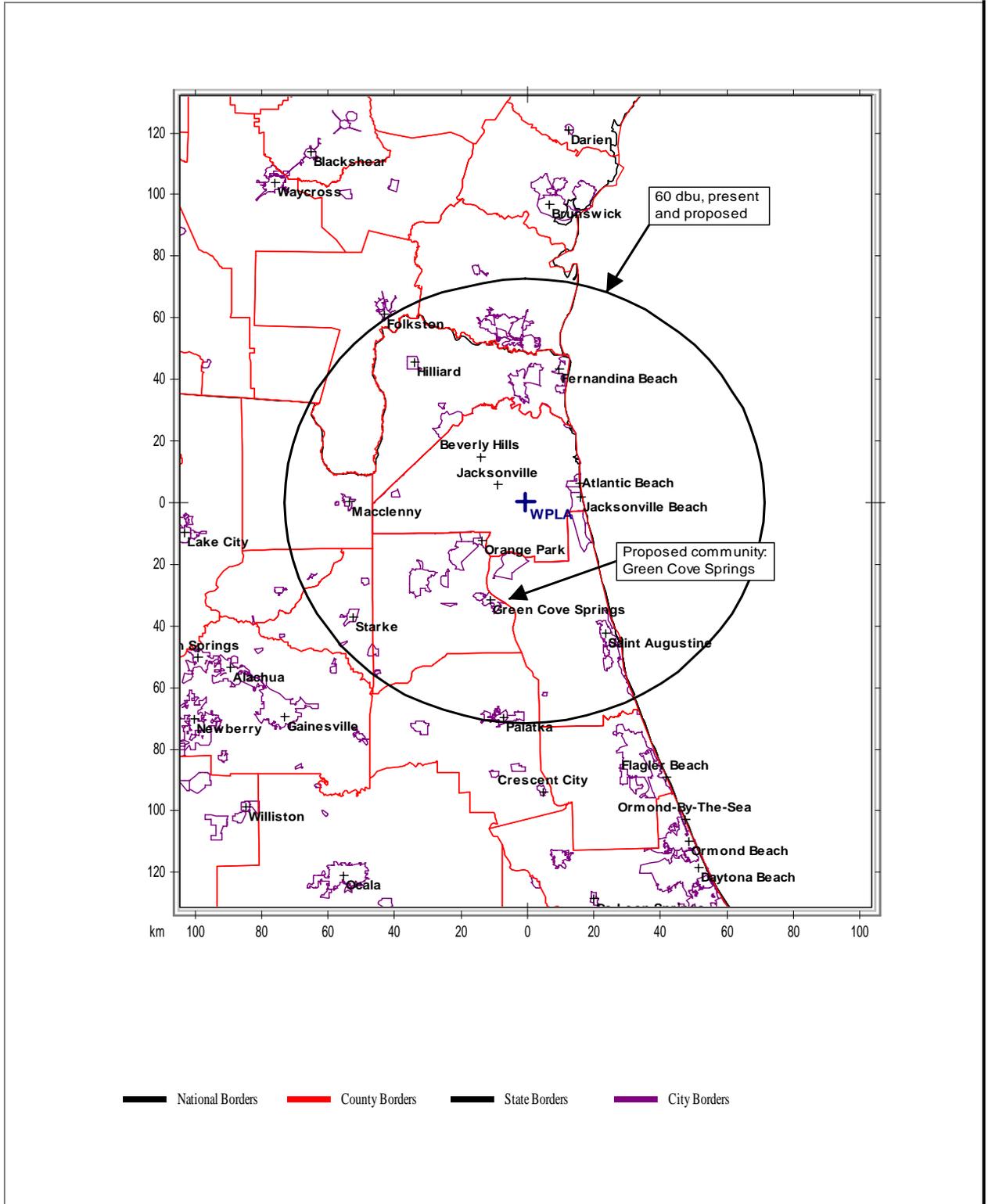


Figure 3
Present and Proposed 70 dBu Service

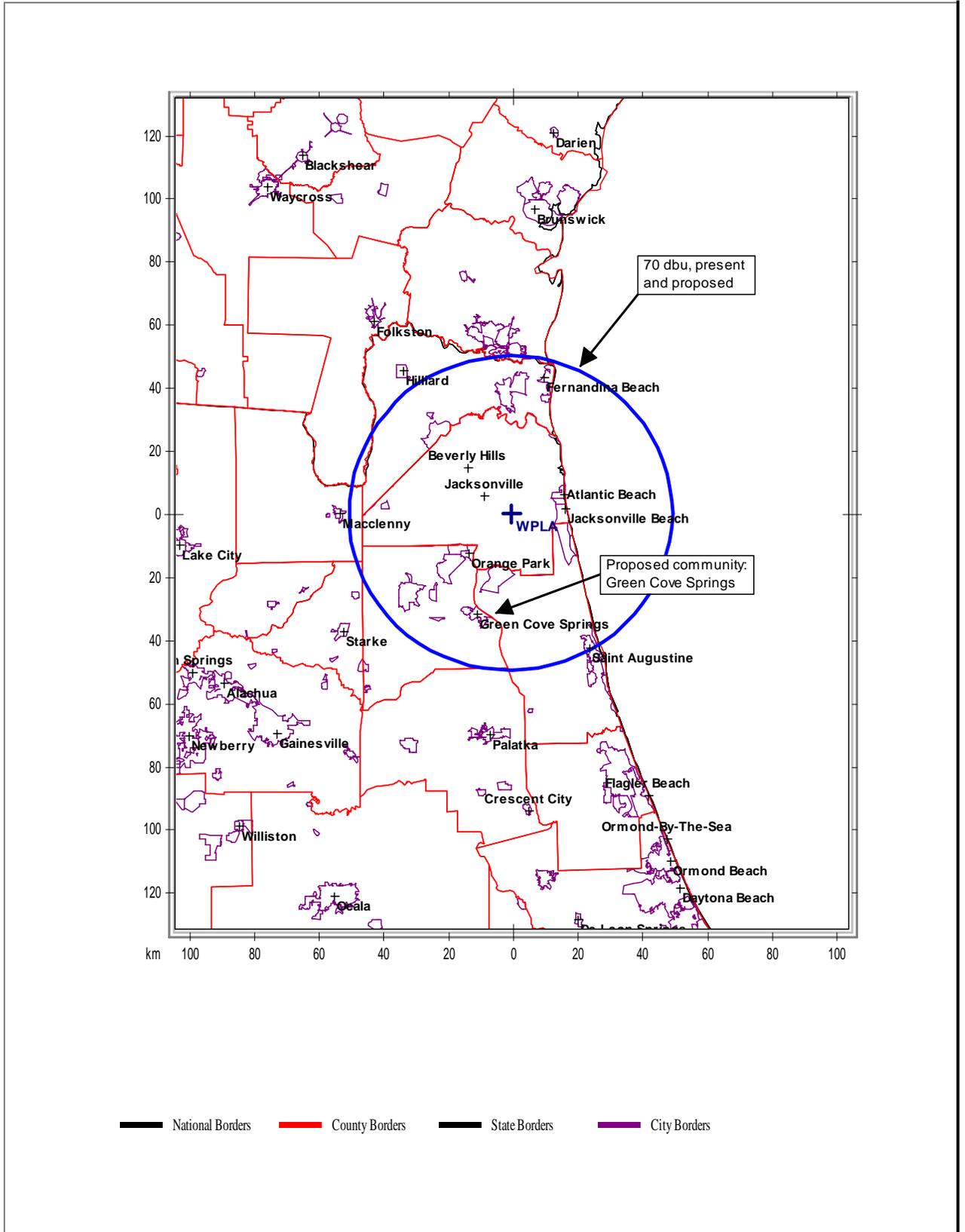


Figure 5
 Tabulation of Services to Community

Call Sign	State	City	Freq	Facility_id
		ST. AUGUSTINE		
WSOS	FL	BEACH	1170	70404
WAOC	FL	ST. AUGUSTINE	1420	2706
WFOY	FL	ST. AUGUSTINE	1240	60271
WPLK	FL	PALATKA	800	54721
WYMM	FL	JACKSONVILLE	1530	11127
WNNR	FL	JACKSONVILLE	970	71219
WJAX	FL	JACKSONVILLE	1220	31937
WCGL	FL	JACKSONVILLE	1360	30609
		JACKSONVILLE		
WIOJ	FL	BEACH	1010	63600
WZNZ	FL	JACKSONVILLE	1460	51976
WOKV	FL	JACKSONVILLE	690	53601
WBWL	FL	JACKSONVILLE	600	53588
WAYR	FL	ORANGE PARK	550	24625
WROS	FL	JACKSONVILLE	1050	66333
WZAZ	FL	JACKSONVILLE	1400	68761
WEWC	FL	CALLAHAN	1160	11214
WJGR	FL	JACKSONVILLE	1320	29736
WQOP	FL	ATLANTIC BEACH	1600	48393
WFXJ	FL	JACKSONVILLE	930	51973
WJCT-FM	FL	JACKSONVILLE	90	73125
WYFB	FL	GAINESVILLE	90	5083
WKTZ-FM	FL	JACKSONVILLE	91	31936
		GREEN COVE		
WJBT	FL	SPRINGS	93	68760
WSOS-				
FM	FL	ST. AUGUSTINE	94	74071
WAPE-FM	FL	JACKSONVILLE	95	70863
WEJZ	FL	JACKSONVILLE	96	55706
WJGL	FL	JACKSONVILLE	97	53590
WFKS	FL	NEPTUNE BEACH	98	67243
WQIK-FM	FL	JACKSONVILLE	99	29728
WGNE-				
FM	FL	MIDDLEBURG	100	15897
WMXQ	FL	JACKSONVILLE	103	53602
WFYV-FM	FL	ATLANTIC BEACH	104	72081
WPLA	FL	JACKSONVILLE	107	51974