

Exhibit 24 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Citadel Broadcasting Company
WGFX(FM) Gallatin, Tennessee
Facility ID 16893
Ch. 283C1 58 kW (MAX-DA) 368 m

Citadel Broadcasting Company (“*Citadel*”), licensee of FM radio station WGFX(FM), Gallatin, Tennessee, holds a Construction Permit (BPH-19991219AAB) to relocate the WGFX transmitting antenna to a site 0.7 kilometers distant from its licensed location (BLH-19880422KD) and to change the effective radiated power, antenna height above average terrain and directional antenna system¹. The instant application proposes minor modification of that Construction Permit, to provide updated transmitter site data, a decrease in antenna height above average terrain, and an increase in effective radiated power. The antenna will be mounted on a new tower structure. The proposed tower structure has been registered with the Commission; the registration number is 1223152.²

The proposed site meets all the minimum distance separation requirements specified in Section 73.207 of the FCC Rules towards all full service licensees, permittees, and allotments, with the exception of WZYP(FM), Channel 282C, Athens, Alabama, and WVRVY(FM), Channel 286C2, Waverly, Tennessee³. WGFX is currently authorized pursuant to Section 73.213(a) with respect to WZYP, and continuance of that authorization is respectfully requested. Authorization pursuant to Section 73.215 is requested with respect to WVRVY.

¹WGFX is presently operating from its auxiliary transmitter site. The WGFX licensed main facility had been located on the WTVF(TV) (Ch. 5, Nashville, TN) tower. The lease for WGFX’s use of the tower space expired on December 31, 1998, and WGFX had to vacate the tower at that time. The instant proposal will be the new main transmitter site for WGFX.

²The FCC registration for this structure is in the process of being updated to reflect the final, as-built site data. Notification has been made to the Federal Aviation Administration, and upon receipt of a “Determination of No Hazard” from that agency, FCC Form 854 will be filed by the structure owner to amend the existing registration.

³A Construction Permit for WMUF-FM, Channel 284A, Henry, Tennessee (BPH-970206MB) is located 132.9 kilometers from the proposed WGFX site. However, Section 73.208(c)(8) of the FCC Rules specifies that distance computations shall be rounded to the nearest kilometer; the separation distance therefore becomes 133 kilometers, which is equal to the 133 kilometer separation requirement of Section 73.207.

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Compliance with Section 73.213(a) re: WZYP

Attached as **Exhibit 24 - Figure 1** is a map illustrating the authorized and proposed predicted interference areas caused by WGFX within the authorized WZYP protected (60 dB μ) contour. With the instant proposal, WGFX is predicted to cause less interference to WZYP than its current licensed main facility. The entire area within the authorized WZYP protected 60 dB μ contour predicted to receive interference from the proposed WGFX is completely encompassed by the existing predicted interference area.

Attached as **Exhibit 24 - Figure 2** is a map illustrating the authorized and proposed predicted interference areas caused by WZYP within the authorized and proposed WGFX protected (60 dB μ) contours. With the instant proposal, *the total area and population* within the WGFX and WZYP protected contours subject to predicted first-adjacent-channel interference caused and received will be *decreased*, as shown in the following table:

Population and Land Area in Interference Areas of Figures 1 & 2			
Protected	Interference From	Population	Land Area (km ²)
WZYP(Lic)	WGFX(Lic)	15,509	457.9
WZYP(Lic)	WGFX(Proposed)	14,839	426.3
WGFX(Lic)	WZYP(Lic)	19,051	462.5
WGFX(Proposed)	WZYP(Lic)	18,117	435.3
<hr/>			
Total Interference Caused & Received			
	by Licensed Facilities	34,560	920.4
	with Proposed WGFX	32,956	861.6

Within the protected contour of WGFX, within areas predicted to receive new first-adjacent-channel interference from WZYP, there are more than five other aural services. Attached as **Exhibit 24 - Figure 3** is a map depicting the interference areas of **Exhibit 24 - Figure 2** with the 60 dB μ contours of other commercial FM stations encompassing all or part of those interference areas. Within the areas of new interference within the protected contour for the proposed WGFX facility, the number of other

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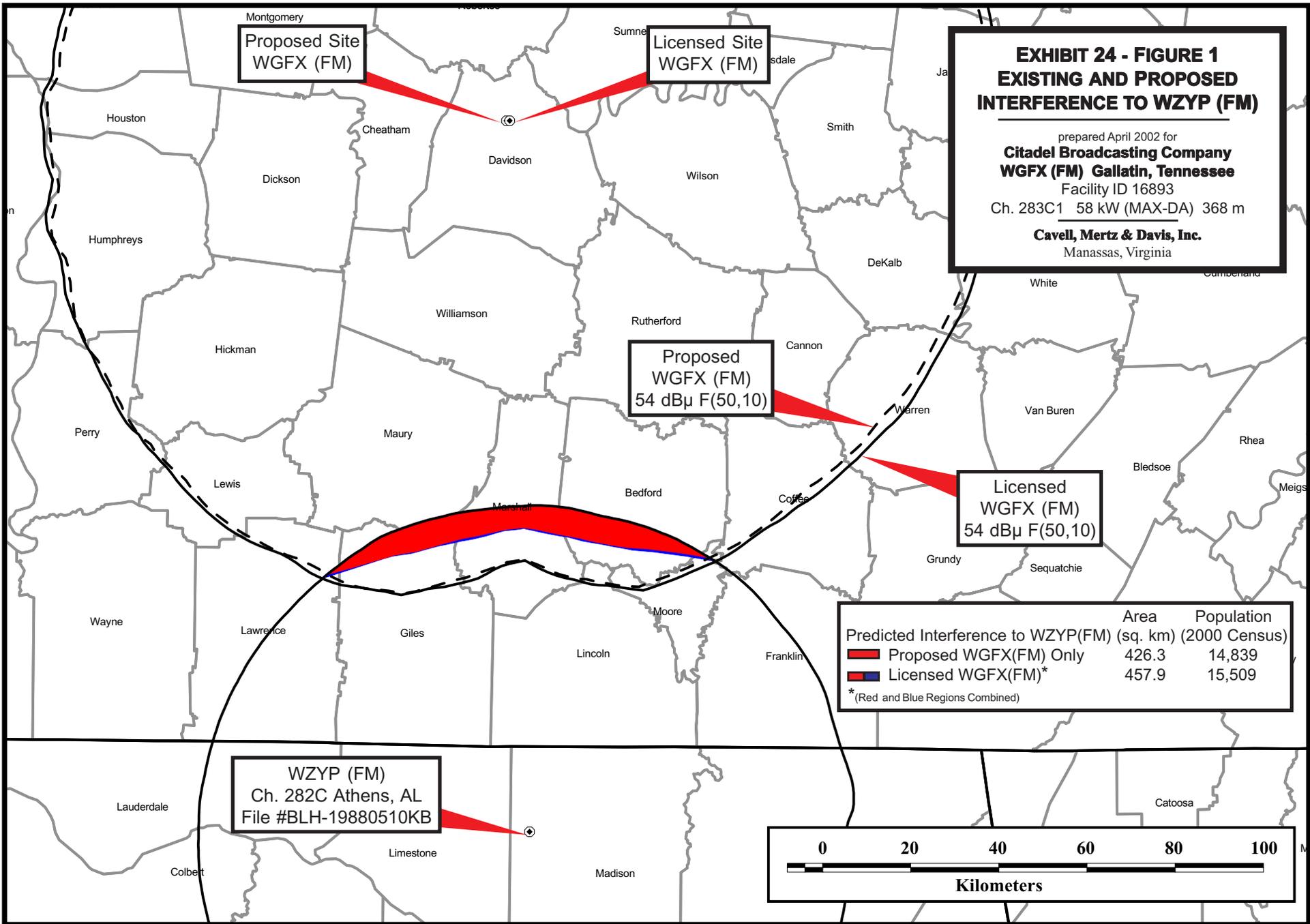
commercial FM stations with 60 dB μ service ranges from 9 to 11. If non-commercial FM and full-time AM stations were to be considered, even more aural services would be counted.

Compliance with Section 73.215 re: WVRV

The proposed WGFX site meets the minimum distance separation requirement of Section 73.215(e) with respect to WVRV. Specifically:

<u>Facility</u>	<u>Distance from proposed facility (km)</u>	<u>Distance required for Section 73.215 (km)</u>
WVRV(FM), Waverly, TN Ch. 286C2 50 kW 150 m	78	73

Exhibit 24 - Figure 4 shows the protected and interfering contours for WVRV and the proposed WGFX operation. **Exhibit 24 - Figure 4A** shows the proposed WGFX protected contour and the WVRV interfering contour at an enlarged scale. As demonstrated therein, the instant proposal complies with the contour protection requirements of Section 73.215.



Proposed Site
WGFX (FM)

Licensed Site
WGFX (FM)

EXHIBIT 24 - FIGURE 1
EXISTING AND PROPOSED
INTERFERENCE TO WZYP (FM)

prepared April 2002 for
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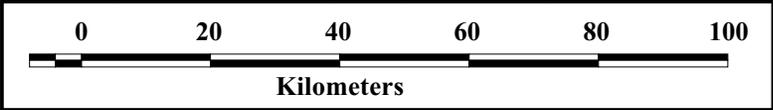
Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Proposed
WGFX (FM)
54 dB μ F(50,10)

Licensed
WGFX (FM)
54 dB μ F(50,10)

WZYP (FM)
Ch. 282C Athens, AL
File #BLH-19880510KB

Predicted Interference to WZYP(FM)	Area (sq. km)	Population (2000 Census)
Proposed WGFX(FM) Only	426.3	14,839
Licensed WGFX(FM)*	457.9	15,509
*(Red and Blue Regions Combined)		



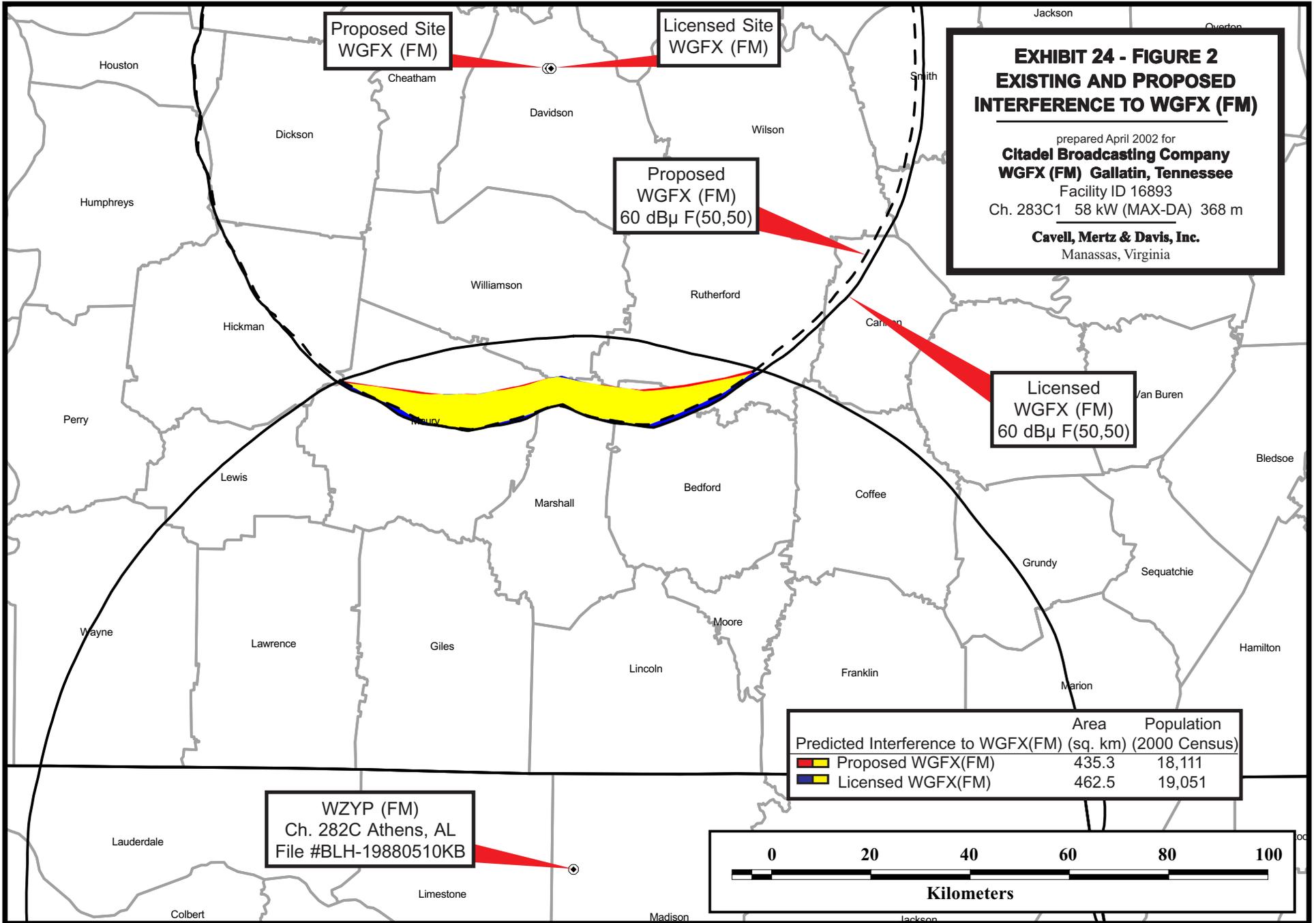
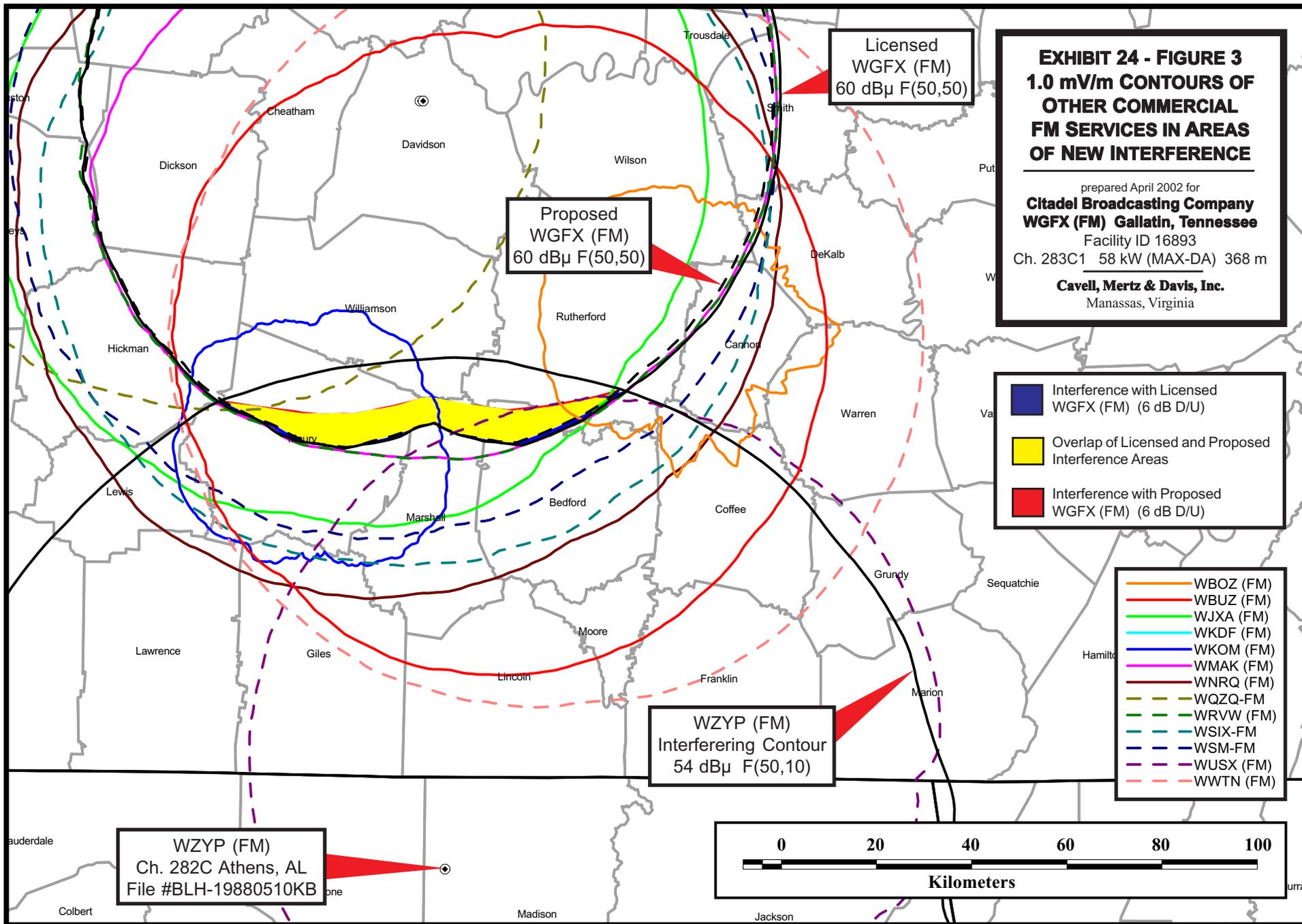


EXHIBIT 24 - FIGURE 3
1.0 mV/m CONTOURS OF
OTHER COMMERCIAL
FM SERVICES IN AREAS
OF NEW INTERFERENCE

prepared April 2002 for
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WGFX (FM) Gallatin, Tennessee
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 Ch. 283C1 58 kW (MAX-DA) 368 m
Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

- Interference with Licensed WGFX (FM) (6 dB D/U)
- Overlap of Licensed and Proposed Interference Areas
- Interference with Proposed WGFX (FM) (6 dB D/U)

- WBOZ (FM)
- WBUZ (FM)
- WJXA (FM)
- WKDF (FM)
- WKOM (FM)
- WMAK (FM)
- WNRQ (FM)
- WQZQ-FM
- WRVW (FM)
- WSIX-FM
- WSM-FM
- WUSX (FM)
- WWTN (FM)



Proposed
 WGFX (FM)
 60 dBμ F(50,50)

Licensed
 WGFX (FM)
 60 dBμ F(50,50)

WZYP (FM)
 Interfering Contour
 54 dBμ F(50,10)

WZYP (FM)
 Ch. 282C Athens, AL
 File #BLH-19880510KB

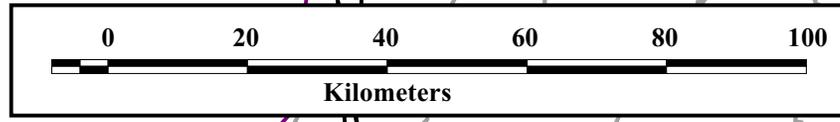


EXHIBIT 24 - FIGURE 4
\$73.215 CONTOUR PROTECTION

prepared April 2002 for
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Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

WVRY (FM) Waverly, TN
 File # BLH-19890619KB
 Ch. 286C2 50 kW 150 m

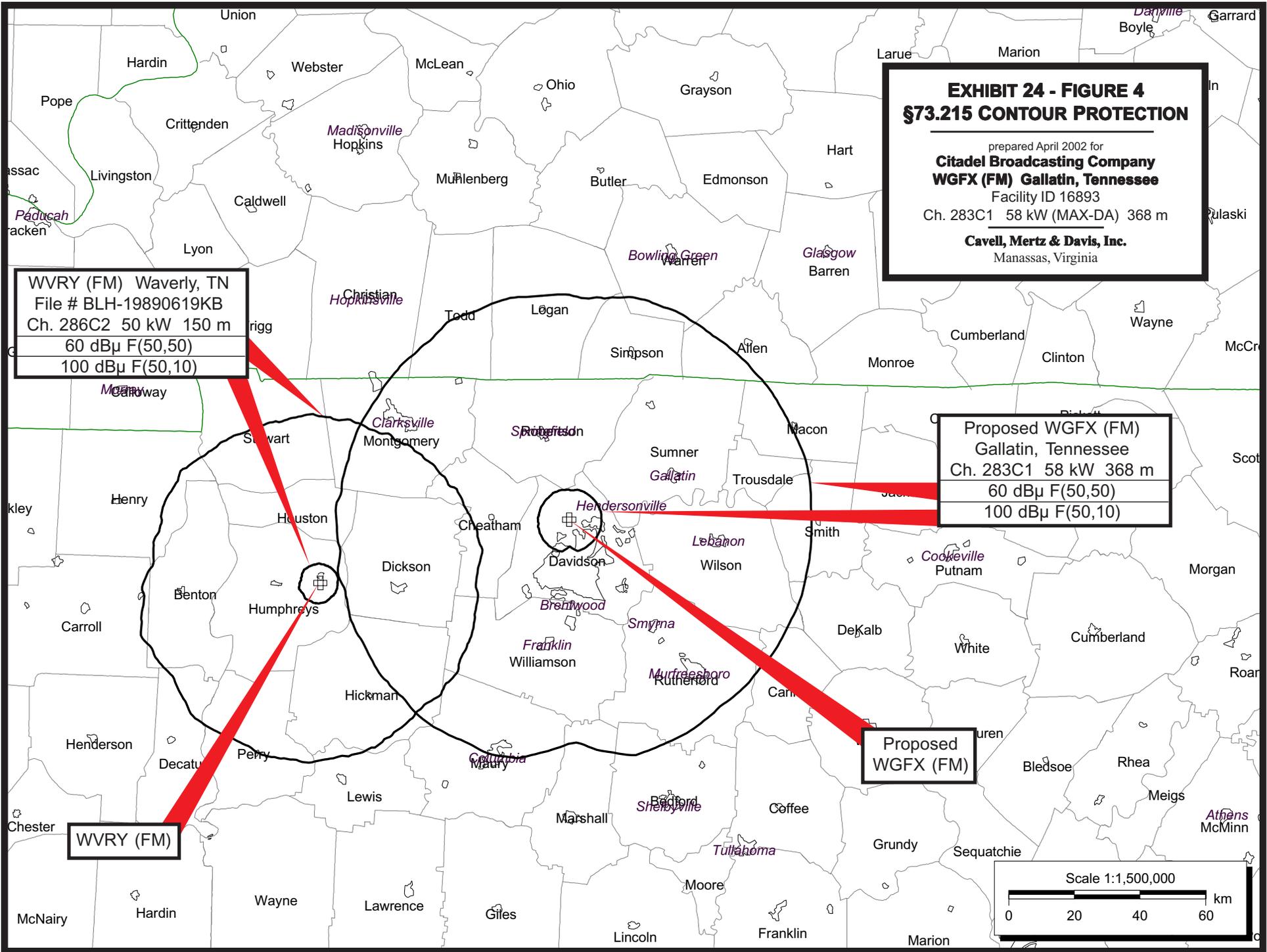
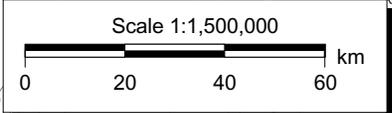
60 dBµ F(50,50)
100 dBµ F(50,10)

Proposed WGFX (FM)
 Gallatin, Tennessee
 Ch. 283C1 58 kW 368 m

60 dBµ F(50,50)
100 dBµ F(50,10)

Proposed WGFX (FM)

WVRY (FM)



WVRY (FM)
100 dB μ F(50,10)

EXHIBIT 24 - FIGURE 4A
§73.215 CONTOUR PROTECTION - DETAIL
prepared April 2002 for
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Cavell, Mertz & Davis, Inc.
Manassas, Virginia



Proposed
WGFX (FM)
60 dB μ F(50,50)

