

Exhibit 14 – Statement C
Application for Construction Permit
WZHF Capitol Heights, MD (FCC Facility ID 73306)
1390 kHz - 9 kW - D 1 kW – N DA-2
Prepared November 2013 for
Way Broadcast Licensee, LLC

Principal Community Change – Section 307(b) Considerations

The relocation of the transmitter site of WZHF is caused by events that are beyond the control of the licensee. A consequence of the relocation is the necessity to change the WZHF City of License (Principal Community) from Arlington, Virginia to Capitol Heights, Maryland. As is discussed elsewhere in this application, it is believed that a grant of this proposal will be in the public interest in that it would allow the continued operation of WZHF, provide the first licensed service to Capitol Heights, Maryland, and allow a measure of continued service to present region of service.

Arlington, Virginia and Capitol Heights, Maryland are both wholly contained within the boundary of the *Washington DC – VA – MA Urbanized Area* (“UA”), as shown in **Exhibit 14 – Figure 12**. An analysis of the existing and proposed UA coverage information is summarized in the following table:

Urbanized Area Coverage Analysis

Washington Urbanized Area ("UA") Data - Population 4,377,800 (2010 Census), Area: 3000.92 km²

Daytime Coverage	Population Covered	Area Covered	Percentage of	Percentage of
<u>5 mV/m Contour</u>	<u>Within UA</u>	<u>Within UA</u>	<u>UA Population</u>	<u>UA Area</u>
Licensed Daytime	1,585,753	706.60 km ²	36.2%	23.5%
Proposed Daytime	1,618,909	736.40 km ²	37.0%	24.5%
Daytime Coverage	Population Covered	Area Covered	Percentage of	Percentage of
<u>2 mV/m Contour</u>	<u>Within UA</u>	<u>Within UA</u>	<u>UA Population</u>	<u>UA Area</u>
Licensed Daytime	2,667,140	1,497.10 km ²	60.9%	49.9%
Proposed Daytime	2,291,551	1,252.27 km ²	52.3%	41.7%
Nighttime Coverage	Population Covered	Area Covered	Percentage of	Percentage of
<u>Interference Free Contour</u>	<u>Within UA</u>	<u>Within UA</u>	<u>UA Population</u>	<u>UA Area</u>
Licensed Nighttime	993,682	305.08 km ²	22.7%	10.2%
Proposed Nighttime	152,304	124.32 km ²	3.5%	4.1%

A comparative analysis of the *overall* daytime areas and populations served was also conducted, yielding the following results:

Overall Populations and Areas Served

<u>Daytime Facility</u>	<u>0.5 mV/m Coverage</u>	<u>2 mV/m Coverage</u>
Licensed Facility Land Area (km ²)	5,835	1,701
Proposed Facility Land Area (km ²)	6,798	1,993
Licensed Facility Population	4,615,643	2,682,588
Proposed Facility Population	4,656,380	2,355,759

Exhibit 14 – Statement C (continued)

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Consideration was given to the service that would be gained and lost under this application proposal. The 0.5 mV/m gain/loss area is illustrated in **Exhibit 14 – Figure 12A**, with gain areas tinted yellow and loss areas tinted red. Similarly, the 2 mV/m gain/loss area is illustrated in **Exhibit 14 – Figure 12B**. An analysis of the areas and populations losing and gaining service is shown below.

	<u>Gain/Loss Area Analysis</u>	
<u>Daytime Facility</u>	<u>0.5 mV/m Coverage</u>	<u>2 mV/m Coverage</u>
Loss (Land) Area (km ²)	1,371	628.6
Gain (Land) Area (km ²)	2,332	921.2
Loss Area Population	361,335	711,538
Gain Area Population	402,072	384,709

Finally, the extent of “other” services being provided to the coverage loss areas was evaluated to determine if any “white” or “gray” areas would be created were this application to be granted.

Specifically, the 0.5 mV/m loss area created under this proposal was examined in the maps of **Exhibit 14 – Figures 12C and 12D**. In particular, **Figure 12C** shows the 0.5 mV/m loss area along with the locations of the predicted 60 dB μ (1 mV/m) contours for FM stations serving the region, while **Figure 12D** shows the 0.5 mV/m loss area along with the locations of the predicted 0.5 mV/m contours for AM stations serving the region. As shown, more than 20 signals serve all predicted 0.5 mV/m loss areas.

The prospective 2 mV/m loss area scenario was also considered. The maps of **Exhibit 14 – Figures 12E and 12F** present the results. **Figure 12E** shows the predicted 2 mV/m loss area along with the locations of the predicted 60 dB μ (1 mV/m) contours for FM stations serving the region, while **Figure 12F** shows the 2 mV/m loss area along with the locations of the predicted 2 mV/m contours for AM stations serving the region. As shown, more than 20 signals serve all predicted 2 mV/m loss areas.

Thus, as is shown herein, there are no new white or gray areas created as a result of this application proposal.