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*Prepared by:*

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# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**TECHNICAL COMMENTS**  
**MM DOCKET #01-177**  
**RADIO STATESBORO, INC.**  
**RE-ALLOT CHANNEL 261C1**  
**RINCON, GEORGIA**  
**September 2001**

**TECHNICAL EXHIBIT**

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**TECHNICAL COMMENTS**  
**MM DOCKET #01-177**  
**RADIO STATESBORO, INC.**  
**RE-ALLOT CHANNEL 261C1**  
**RINCON, GEORGIA**  
**September 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Radio Statesboro, Inc. ("RSI"), licensee of FM station WMCD, Channel 261C2, Statesboro, Georgia. RSI has submitted a counterproposal in MM Docket #01-123, in which the Commission was seeking comments on the proposed allotment of Channel 262A at Darien, Georgia. RSI had proposed that in lieu of the Darien allocation, WMCD be upgraded to Channel 261C1 and that the channel be re-allotted to Rincon, Georgia, as that community's first licensable FM channel. In its comments in MM Docket #01-123, RSI further noted that its request was also mutually exclusive with the request of International Systems Corp. ("ISC"), the proponent of a proposed allotment to Screven, Georgia. It is ISC's requested allotment of Channel 260A to Screven which is now being considered in MM Docket #01-177.

2. RSI's comments in MM Docket #01-123 are herein incorporated by reference. RSI herein submits gain and loss area studies for Statesboro/Rincon and Screven, showing the number of reception services. In its request, RSI noted that the removal of Channel 261 from Statesboro would not create any white or grey area, nor leave the community without a licensed, full-time transmission service.<sup>1</sup>

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1) Statesboro will retain the licensed service of WPMX, Channel 275C3; WVGS, Channel 220A; WPTB, 850 kHz; and WWNS, 1240 kHz.

## DISCUSSION

3. It is noted, that the re-allotment of Channel 261C1 to Rincon will create a small loss area in Jenkins and Screven Counties, Georgia. While this loss area does not create any white or gray area, there are less than five full time services present (addressed below). A study of the available services in both the Statesboro/Rincon gain and loss areas, and in the proposed Screven service area has been undertaken.<sup>2</sup> Exhibit #1 is a map depicting the licensed 60 dBu contour of WMCD, the theoretical contour of a maximum Class C1 facility operating at Rincon and those AM and FM stations providing service to that area.<sup>3</sup>

4. A tabulation of those stations in the Statesboro/Rincon area is attached as Exhibit #2. Based on the facilities depicted, there are no white or grey areas within the area predicted to receive service from the licensed facilities of WMCD, with the exception of an area of where WMCD presently provides fourth service to 3,254 persons in 16.6 square kilometers and an area where WMCD presently provides fifth service to 2,205 persons in 223.9 square kilometers,<sup>4</sup> as detailed in Exhibit #3.<sup>5</sup> Within the Rincon gain area, there are two under-served sectors. The

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- 2) The service areas of the licensed WMCD are based on its licensed facility. The Class C1 proposal for Rincon and Class A service area for Screven are based on 60 dBu contour radii of 72 kilometers and 28 kilometers respectively. It is noted that the population within the present WMCD 60 dBu contour, as reported in RSI's counterproposal, contained a typographical error. The total population within the licensed WMCD contour is 118,684 persons, rather than the 118,687 persons originally reported.
  - 3) For all commercial FM stations, with the exception of Class C, maximum class contours were used. For Class C facilities, the contours were based on their respective authorizations or, in the case of vacant allotments, minimum values for the Class. For non-commercial FM stations the facilities' actual licensed values were used to determine the reference distance to the 60 dBu contour. Since no Class A AM facilities impacted the area, the nighttime interference-free contours of Class B and C facilities were used. In the case of Class D stations, due to the high level of interference, the 25.0 mV/m contours were used. The AM facilities were only considered where their service areas impacted an area with less than five existing full-time services.
  - 4) The area and population calculations were made using the computer program "Probe 2". The population is in a block census form (2000 census data), with a 1.5 kilometer resolution, extracted from the PL 94-171 files.
  - 5) The remaining loss area contains 72 persons in 16.5 square kilometers, but this area already has five or more existing full time services.

improved WMCD at Rincon would provide a fourth service to 253 persons in 7.4 square kilometers and a fifth service to 50 persons in 11.6 square kilometers. The remainder of the Rincon gain area, containing 427,194 persons in 10,535.5 square kilometers, is presently served by five or more facilities and is considered well served.<sup>6</sup>

5. Exhibit #4 depicts the services providing service to the predicted theoretical 60 dBu contour of the proposed Screven Class A. The FM facilities providing service to the gain area are tabulated on Exhibit #5. As detailed, there are already five existing services covering the entire Screven theoretical 60 dBu contour, therefore, the area is already considered well served.<sup>7</sup>

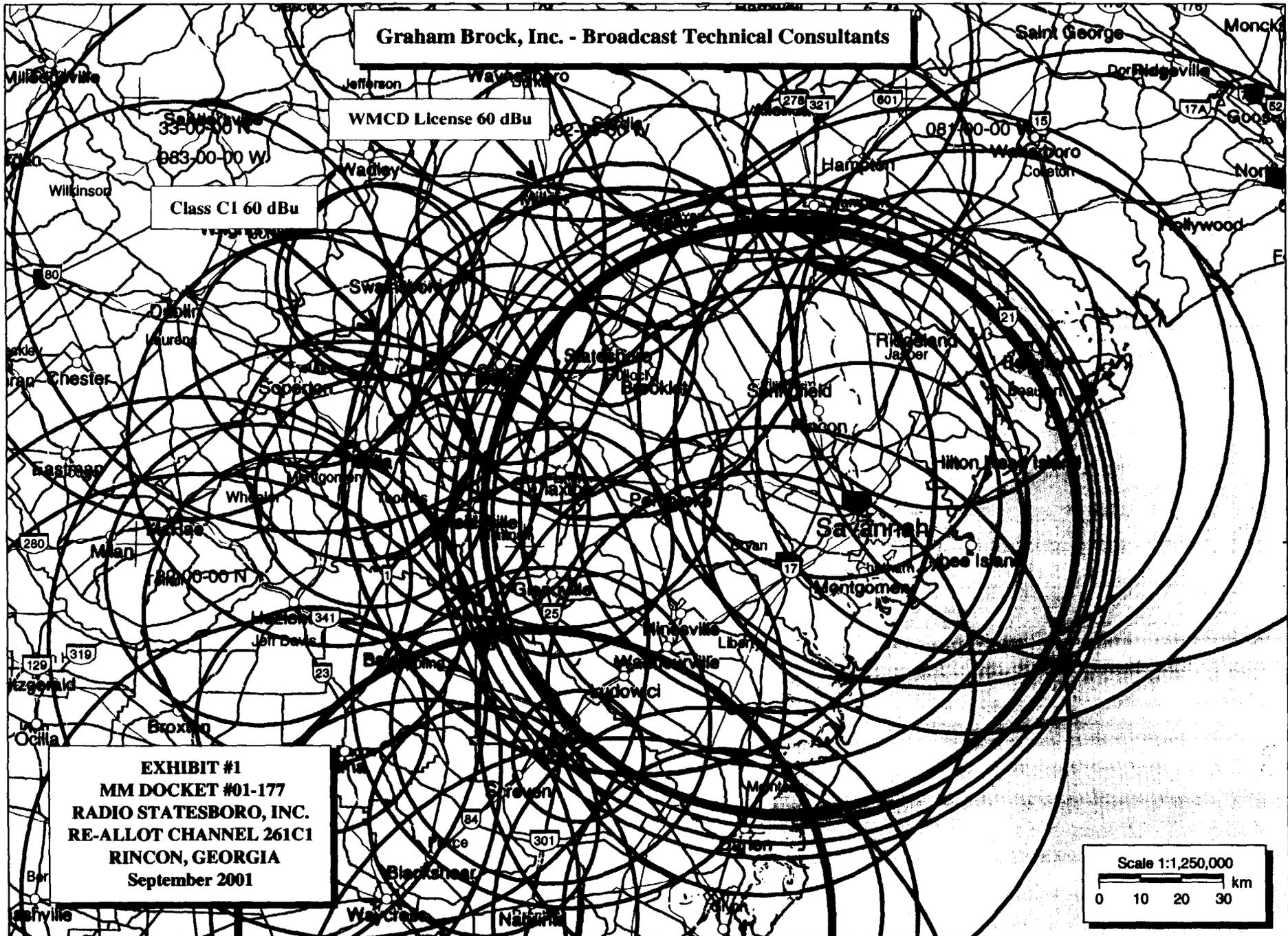
6. The proposed re-allotment of Channel 261C1 will not deprive Statesboro of its only local service and will provide Rincon with its first local transmission service. Further, while there is a loss of fourth and fifth service, the re-allotment will provide new service to 427,497 persons. Further, the proposed Screven facility would only provide service to 33,930 persons in 2,516.1 square kilometers. Based on the foregoing, RSI respectfully requests the upgrade of Channel 261C2 to Channel 261C1 and the re-allotment of the channel to Rincon, Georgia.

7. The foregoing statement was prepared on behalf of Radio Statesboro, Inc., by Graham Brock, Inc. its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in those databases which may be adverse to the information contained herein.

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6) The gain area was determined by calculating the total population and area within the theoretical 60 dBu contour of the Rincon facility, subtracting the area in common with the licensed WMCD facility, and subtracting the calculated loss area.

7) There are numerous other stations providing services to the Screven 60 dBu contour, but they were not considered since the area was already considered well served.



Graham Brock, Inc. - Broadcast Technical Consultants

WMCD License 60 dBu

Class C1 60 dBu

**EXHIBIT #1**  
**MM DOCKET #01-177**  
**RADIO STATESBORO, INC.**  
**RE-ALLOT CHANNEL 261C1**  
**RINCON, GEORGIA**  
**September 2001**

Scale 1:1,250,000  
 0 10 20 30 km

**TECHNICAL COMMENTS**  
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**September 2001**

**EXHIBIT #2**

**Tabulation of Stations Considered in Gain/Loss Area of**  
**Channel 261C1 at Statesboro/Rincon, Georgia**

**FM Stations**

<b><u>Call Sign</u></b>	<b><u>Channel</u></b>	<b><u>Power</u></b>	<b><u>Service Radius</u></b>	<b><u>City/State</u></b>
WLPT	202C1	20.00 kW	53 km	Jesup, GA
WMOC	204C2	50.00 kW	37 km	Lumber City, GA
WYFS	208C1	100.00 kW	62 km	Savannah, GA
WXVS	211C1	79.00 kW	68 km	Waycross, GA
WTLD (CP)	213A	6.00 kW	16 km	Jesup, GA
WSVH	216C	100.00 kW	74 km	Savannah, GA
WGPH	218C2	40.00 kW	51 km	Vidalia, GA
WVGS	220A	1.00 kW	13 km	Statesboro, GA
WBHC-FM	221A	6.00 kW	28 km	Hampton, SC
WSKX	222C2	50.00 kW	52 km	Hinesville, GA
WKKZ	224C2	50.00 kW	52 km	Dublin, GA
WEAS-FM	226C1	25.00 kW	72 km	Savannah, GA
WVOH-FM	228C3	25.00 kW	39 km	Hazlehurst, GA
WSCA	231C0	100.00 kW	83 km	Savannah, GA
WBYZ	233C	100.00 kW	73 km	Baxley, GA
WHKN	235C3	14.50 kW	39 km	Millen, GA
WIXV	238C1	100.00 kW	72 km	Savannah, GA
WQZY	240C1	88.00 kW	72 km	Dublin, GA
WJCL-FM	243C	100.00 kW	76 km	Savannah, GA
WAEV	247C	100.00 kW	73 km	Savannah, GA
WTCQ	249A	6.00 kW	28 km	Vidalia, GA
WIIZ	250C2	50.00 kW	52 km	Blackville, SC
WELT	251A	3.00 kW	24 km	Swainsboro, GA
WGCO	252C1	100.00 kW	72 km	Midway, GA
WYKZ	254C1	100.00 kW	72 km	Beaufort, SC
WDMG-FM	258C1	100.00 kW	72 km	Douglas, GA
WJZX	259C	100.00 kW	77 km	Port Royal, SC
WXRS-FM	263A	3.00 kW	24 km	Swainsboro, GA
WLYU (CP)	265A	6.00 kW	28 km	Lyons, GA
WLVH	266C2	50.00 kW	52 km	Hardeeville, SC

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**RINCON, GEORGIA**  
**September 2001**

**EXHIBIT #2 (continued)**

**Tabulation of Stations Considered in Gain/Loss Area of**  
**Channel 261C1 at Statesboro/Rincon, Georgia**

**FM Stations**

<b>Call Sign</b>	<b>Channel</b>	<b>Power</b>	<b>Service Radius</b>	<b>City/State</b>
WSOL-FM	268C	100.00 kW	83 km	Brunswick, GA
WYUM (CP)	269A	3.60 kW	28 km	Mount Vernon, GA
WZAT (CP)	271C	100.00 kW	80 km	Savannah, GA
WBGA	273C1	97.00 kW	72 km	Waycross, GA
WPMX	275C3	25.00 kW	39 km	Statesboro, GA
WGZO (CP)	276C3	17.50 kW	39 km	Parris Island, SC
WWSN	277C	100.00 kW	73 km	Waycross, GA
WSIS	280C3	14.00 kW	39 km	Springfield, GA
WRBX	281A	5.00 kW	28 km	Reidsville, GA
WAJQ-FM	282A	4.50 kW	28 km	Alma, GA
WHVL (CP)	284C3	12.00 kW	39 km	Hinesville, GA
WBMZ	285A	3.00 kW	24 km	Metter, GA
WGZR (CP)	285C3	16.00 kW	39 km	Ridgeland, SC
WKUB (CP)	286C2	50.00 kW	52 km	Blackshear, GA
WRHQ	287C3	11.00 kW	39 km	Richmond Hill, GA
WIFO-FM	288C3	25.00 kW	39 km	Jesup, GA
WZNY	289C	100.00 kW	78 km	Augusta, GA
WXMK	290C3	15.00 kW	39 km	Dock Junction, GA
WKTM	291A	6.00 kW	28 km	Soperton, GA
WFXH-FM	291C2	25.00 kW	52 km	Hilton Head Island, SC
WKIG-FM	292A	6.00 kW	28 km	Glennville, GA
WZBX	293A	6.00 kW	28 km	Sylvania, GA
WOKA-FM	294C1	100.00 kW	72 km	Douglas, GA
WWVV	295C1	100.00 kW	72 km	Bluffton, SC
Vacant	296A	0.00 kW	28 km	Patterson, GA
WCLA-FM	297C3	25.00 kW	39 km	Claxton, GA
WYNR	299C2	50.00 kW	52 km	Darien, GA
WLOW	300C2	24.00 kW	52 km	Hilton Head Island, SC

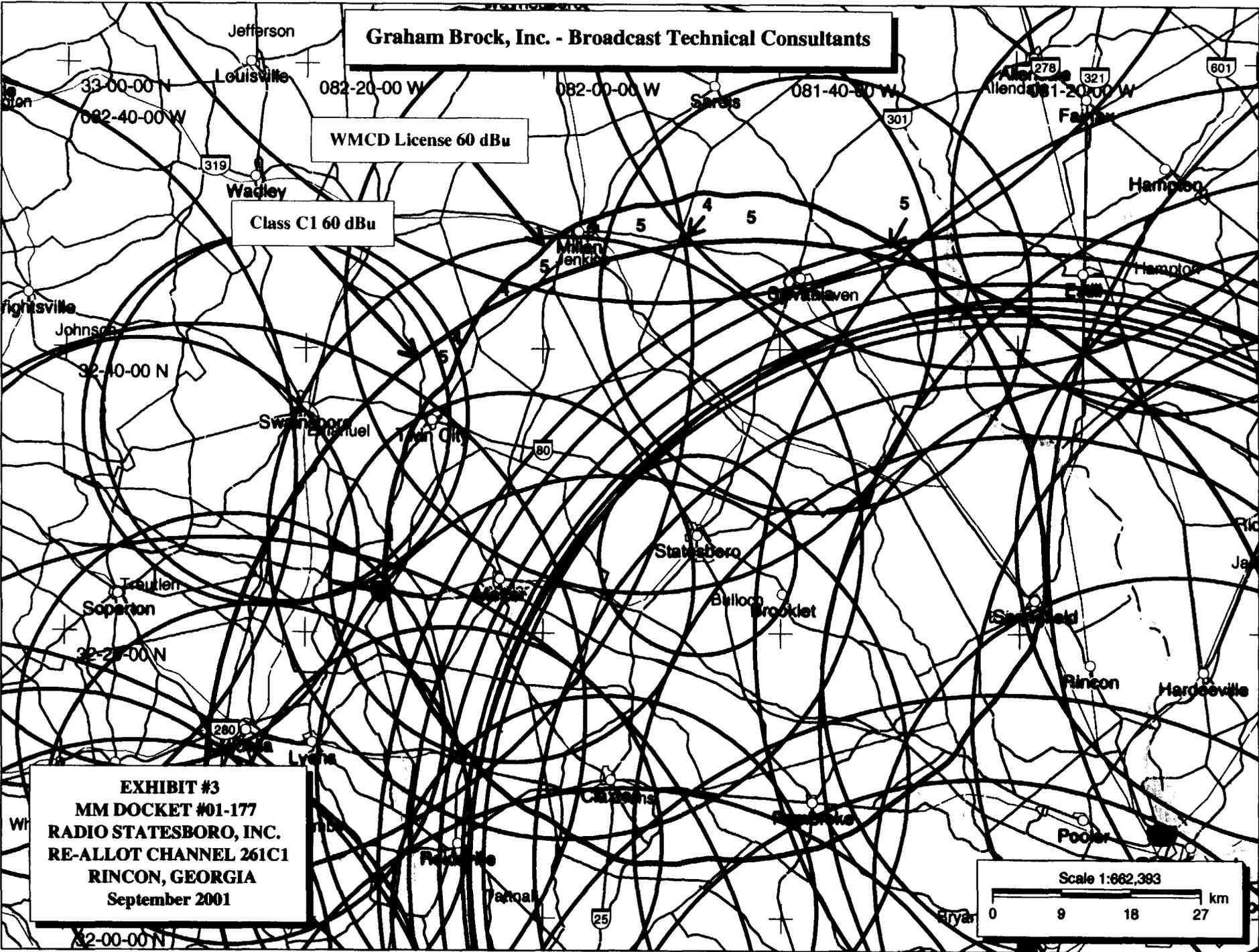
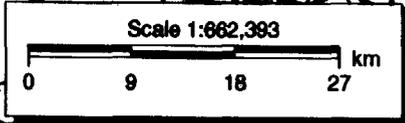
NOTE: All presently vacant FM allotments were considered as part of this reception services analysis.

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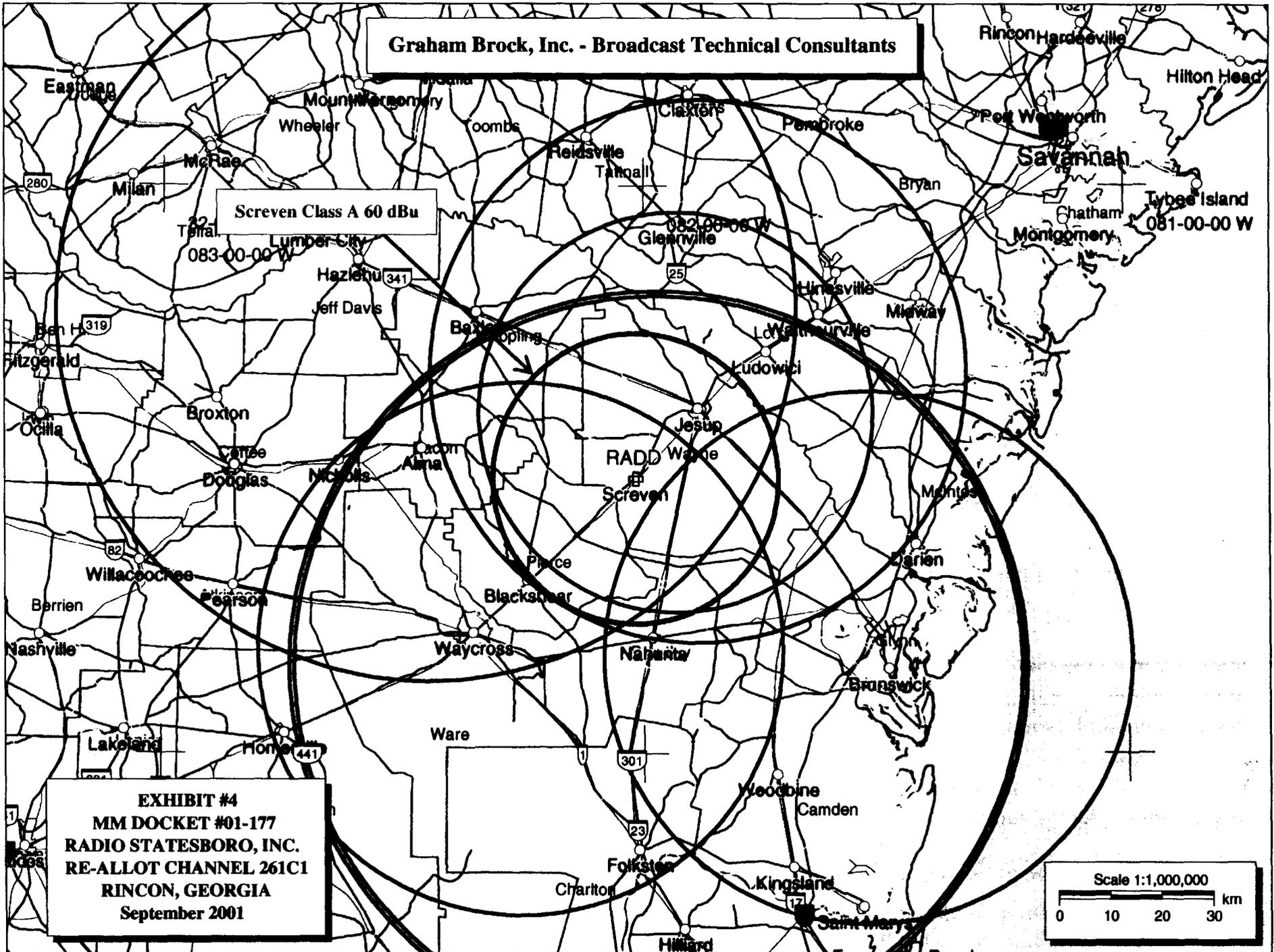
WMCD License 60 dBu

Class C1 60 dBu

**EXHIBIT #3**  
**MM DOCKET #01-177**  
**RADIO STATESBORO, INC.**  
**RE-ALLOT CHANNEL 261C1**  
**RINCON, GEORGIA**  
**September 2001**



Graham Brock, Inc. - Broadcast Technical Consultants



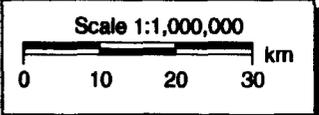
Screven Class A 60 dBu

083-00-00 W

082-00-00 W

081-00-00 W

**EXHIBIT #4**  
**MM DOCKET #01-177**  
**RADIO STATESBORO, INC.**  
**RE-ALLOT CHANNEL 261C1**  
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**September 2001**

**EXHIBIT #5**

**Tabulation of Stations Considered in Gain/Loss Area of**  
**Channel 260A at Screven, Georgia**

**FM Stations**

<b><u>Call Sign</u></b>	<b><u>Channel</u></b>	<b><u>Power</u></b>	<b><u>Service Radius</u></b>	<b><u>City/State</u></b>
WLPT	202C1	20.00 kW	53 km	Jesup, GA
WBYZ	233C	100.00 kW	73 km	Baxley, GA
WGCO	252C1	100.00 kW	72 km	Midway, GA
WBGA	273C1	97.00 kW	72 km	Waycross, GA
WWSN	277C	100.00 kW	73 km	Waycross, GA
WKUB (CP)	286C2	50.00 kW	52 km	Blackshear, GA
WIFO-FM	288C3	25.00 kW	39 km	Jesup, GA

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

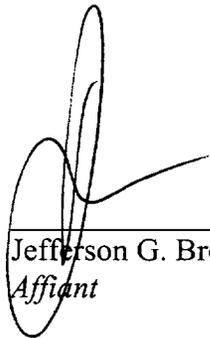
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Radio Statesboro, Inc., licensee of Radio Station WMCD, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 19th day of September, 2001.*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 19th day of September, 2001.*



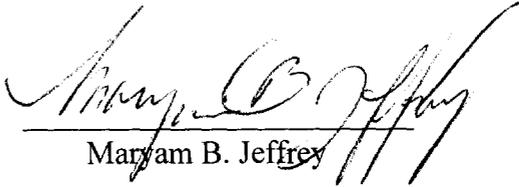
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*Notary Public, State of Georgia*  
*My Commission Expires: April 20, 2002*

**CERTIFICATE OF SERVICE**

I, Maryam B. Jeffrey, hereby certify that on September 24, 2001, a copy of the foregoing "Comments" was sent by First Class mail, postage prepaid, to the following:

International Systems Corp.  
c/o The office of Dan J. Alpert  
2120 N. 21<sup>st</sup> Road  
Arlington, VA 22201

  
Maryam B. Jeffrey