

Before The
Federal Communications Commission
Washington, D.C. 20554

In re Application of)	
)	
TRIGNITION MEDIA LLC)	FCC File No. BP - 20220630AAD
)	
For a Construction Permit)	Facility ID No. 26314
for a Minor Change in)	
WRYM, New Britain, CT)	

Attention: Chief, Audio Division, Media Bureau

Informal Objection

Carter Broadcasting Corporation (“Carter”), licensee of station WCRN(AM), Worcester, Massachusetts, Facility ID 9201, by its attorney and pursuant to Section 73.3587 of the Commission’s Rules, hereby respectfully objects to the above-captioned application of Trignition Media LLC (“Trignition”). As set forth in the attached Engineering Statement of Roy P. Stype, III, WRYM’s proposed changes will create prohibited overlap between WCRN’s licensed 0.5 mV/m contour and the proposed WRYM 0.25 mV/m contour, and between WCRN’s licensed 0.25 mV/m contour and the proposed WRYM 0.5 mV/m contour.

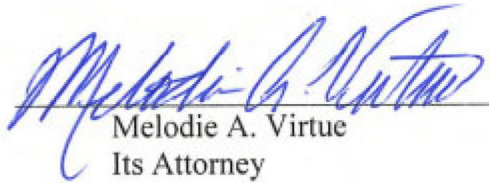
The measurement data WRYM supplied in its application does not comply with the requirements of FCC Rule 73.186. It is deficient because it lacks a tabulation of the date and time of each measurement, the field strength, and the distance from the antenna required by this rule section. The application also failed to include existing measurements from the 1998 full proof of performance on WRYM’s licensed nighttime directional pattern and additional measurements on WRYM from 1999 conducted by WCRN, the absence of which fails to depict prohibited groundwave overlap with WCRN’s presently licensed daytime facilities. When all

measured conductivity values are considered, WRYM's proposal is not acceptable as required by FCC Rule 73.37. See attached Engineering Statement.

Consequently, the Commission must dismiss WRYM's application as unacceptable.

Respectfully submitted,

CARTER BROADCASTING CORPORATION



Melodie A. Virtue
Its Attorney

FOSTER GARVEY PC
1000 POTOMAC STREET, NW
SUITE 200
WASHINGTON, DC 20007
(202) 298-2527
melodie.virtue@foster.com

August 18, 2022

ENGINEERING STATEMENT IN
SUPPORT OF OBJECTIONS
WRYM(AM) - NEW BRITAIN, CT
(BP-20220630AAD)

Carter Broadcasting Corporation
Worcester, MA

August 17, 2022

Prepared For: Mr. Kurt Carberry
Carter Broadcasting Corporation
30 Braintree Hill Park
Suite 108
Braintree, MA 02184

CARL E. SMITH CONSULTING ENGINEERS

CONTENTS

Title Page

Contents

Engineering Affidavit

Roy P. Stype, III

Engineering Statement

Table 1.0 - Normally Protected Contours WCRN - Worcester, MA

Table 1.1 - Proposed Daytime Contours WRYM - New Britain, CT

Fig. 1.0 - Detailed Allocation Study

Additional WRYM Field Strength Measurements

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Carter Broadcasting Corporation to prepare the attached "Engineering Statement in Support of Objections - WRYM(AM) - New Britain, CT (BP-20220630AAD)."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **August 17, 2022**.



Notary Public

/SEAL/

**Nancy A. Adams, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires Sept. 27, 2025**

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of the Carter Broadcasting Corporation, licensee of Radio Station WCRN(AM) - Worcester, Massachusetts. WCRN operates on 830 kHz with 50 kilowatts unlimited time using separate directional patterns for day and night operation. On June 30, 2022, the licensee of WRYM(AM) - New Britain, Connecticut, filed an application for a construction permit to improve its daytime operating facilities. WRYM presently operates on 840 kHz with one kilowatt nondirectional day and 125 watts at night using a two tower directional antenna system. The WRYM application proposes to increase the station's daytime power to 3.5 kilowatts using a two tower directional pattern which utilizes the same two towers as WRYM's licensed nighttime operating facilities. This engineering statement supports objections against the WRYM application based on prohibited groundwave overlap with WCRN's licensed daytime directional facilities.

The WRYM construction permit application includes the results of extensive field strength measurements to attempt to document that, when actual measured ground conductivity values are considered, there will be no prohibited overlap between the proposed WRYM daytime facilities and WCRN's licensed daytime facilities. The measurements used for WCRN were extracted from the 2003 construction permit application (BP-20030114AAK) for WCRN's presently licensed nighttime facilities.

The WRYM construction permit application includes the results of field strength measurements which were conducted on five radials (5°, 25°, 45°, 65°, and 85°) on WRYM's presently licensed nondirectional daytime operating facilities. Unfortunately, although it is referenced in the engineering narrative, the measurement data included in the WRYM application fails to comply with the requirements of Section 73.186 of the

FCC Rules because it fails to include a tabulation of the measurement data, the date and time of each measurement, the field strength, and the distance from the antenna. As a result, it's impossible to verify the analysis of these measurements or determine if they were properly taken outside of nighttime and critical hours.

This application also fails to include measurements from the 1998 full proof of performance (BL-980319KA) on WRYM's presently licensed nighttime pattern and additional measurements on WRYM on the 23.1° radial which were conducted by WCRN and included in the 1999 application for the construction permit (BP-19990524AB) for WCRN's presently licensed 50 kilowatt daytime directional facilities.¹ As outlined below, when these additional measurements are included as part of the analysis, the proposed WRYM daytime directional facilities will result in prohibited groundwave overlap with WCRN's presently licensed daytime facilities.

Table 1.0 presents a tabulation of the predicted 0.5 mV/m and 0.25 mV/m contours for WCRN's presently licensed 50 kilowatt daytime directional facilities over the pertinent arc toward WRYM. Similarly, Table 1.1 presents a tabulation of the predicted 0.5 mV/m and 0.25 mV/m contours for the daytime directional facilities proposed in the WRYM application over the pertinent arc toward WCRN. These contours were projected using all of the known available measured conductivity data (as outlined in the notes included in each table) and supplemented with conductivity data extracted from FCC Figure M3 in areas where no measured conductivity data was available. Figure 1.0 depicts all of these contours on an appropriate map base. As shown in this map exhibit, when all of this measured conductivity data is considered, there will be prohib-

¹Copies of these measurements are included in an appendix to this engineering statement.

ited overlap between the licensed WCRN 0.5 mV/m contour and the proposed WRYM 0.25 mV/m contour and also between the licensed WCRN 0.25 mV/m contour and the proposed WRYM 0.5 mV/m contour in two separate areas. As a result the WRYM application should be denied for violating Section 73.37(a) of the FCC Rules.

TABLE 1.0

NORMALLY PROTECTED CONTOURS
WCRN - WORCESTER, MA
 Carter Broadcasting Corporation
 Worcester, MA

<u>Azimuth (Degrees)</u>	<u>Radiation (mV/m at 1 km)</u>	<u>Conductivities (mmhos/m/ending distance (km))</u>	<u>0.5 mV/m Contour (km)</u>	<u>0.25 mV/m Contour (km)</u>
155	1428.4	1*/33.2, 2/97.4, 5000	73.62	121.76
160	1270.1	1*/33.2, 2	69.36	97.51
165	1118.4	1*/33.2, 2	64.97	91.79
170	976.0	1*/33.2, 2	60.51	85.95
175	945.4	0.1**/35, 2	41.05	65.07
180	729.3	0.1**/35, 2	36.77	59.38
185	630.4	0.1**/35, 2	33.61	54.07
190	550.9	0.1**/19, 2	39.35	59.44
195	491.9	0.1**/19, 2	36.61	55.74
200	452.8	0.1**/19.5, 2	34.38	52.84
205	430.6	0.1**/19.5, 2	33.24	51.31
210	420.4	0.1**/19.5, 2	32.71	50.58
215	417.0	0.5*/32.5, 2	30.61	47.49
220	416.4	0.5*/32.5, 2	30.59	47.45
225	416.4	0.5*/32.5, 2	30.59	47.45
230	416.8	0.5*/32.5, 2	30.60	47.47
235	419.3	0.1***/28.3, 2	27.51	44.87
240	427.8	0.1***/28.3, 2	27.78	45.47
245	447.2	0.1**/23.1, 2	31.73	50.09
250	482.6	0.1**/23.1, 2	33.49	52.47
255	537.4	0.1**/23.1, 2/45.8, 1	36.07	53.84
260	612.9	0.1***	33.15	46.39
265	708.1	0.1***	35.57	49.71

TABLE 1.0 (cont'd)

<u>Azimuth (Degrees)</u>	<u>Radiation (mV/m at 1 km)</u>	<u>Conductivities (mmhos/m/ending distance (km))</u>	<u>0.5 mV/m Contour (km)</u>	<u>0.25 mV/m Contour (km)</u>
270	820.9	0.1***	38.22	53.34
275	948.8	2/30.6, 1	62.38	82.47
280	1089.1	0.5*/28.5, 1	51.61	72.89
285	1239.1	0.5*/28.5, 1	55.12	77.56

*Measured conductivity data extracted from WCRN 2001 full proof of performance (BL-20010119AE).

**Measured conductivity data extracted from WCRN 301 application (BP-19990524AB).

***Measured conductivity data extracted from WCRN 1994 full proof of performance (BL-19940924AC).

All other conductivity data extracted from FCC Figure M3.

TABLE 1.1

PROPOSED DAYTIME CONTOURS
WRYM - NEW BRITAIN, CT
 Carter Broadcasting Corporation
 Worcester, MA

<u>Azimuth (Degrees)</u>	<u>Radiation (mV/m at 1 km)</u>	<u>Conductivities (mmhos/m/ending distance (km))</u>	<u>0.5 mV/m Contour (km)</u>	<u>0.25 mV/m Contour (km)</u>
350	593.4	2/32.7, 1	52.34	68.73
355	628.2	2* 0.5*	42.50	51.76
0	661.7	2* 0.5*	42.50	53.04
5	693.6	2* 0.5*	42.50	54.22
10	723.5	2* 0.5*	42.50	55.31
15	751.4	1***/49.5, 1	48.43	66.60
20	776.9	1***/49.5, 2	49.18	67.68
25	800.0	0.5*	41.81	57.80
30	820.6	0.5*	42.31	57.80
35	838.6	0.5*	42.75	57.80
40	854.0	0.5*	43.12	59.76
45	866.8	0.5*	43.43	60.17
50	877.1	0.5*	43.43	60.50
55	884.9	0.5*	43.86	60.75
60	890.1	0.1*	39.76	55.43
65	892.9	0.1*	39.82	55.51
70	893.2	1.5**/31.2, 2	64.72	89.28
75	891.0	1.5**/31.2, 2	64.65	89.18
80	886.4	0.1*	39.68	55.32
85	879.2	0.1*	39.52	55.10
90	869.5	0.1*	39.31	54.82

TABLE 1.1 (cont'd)

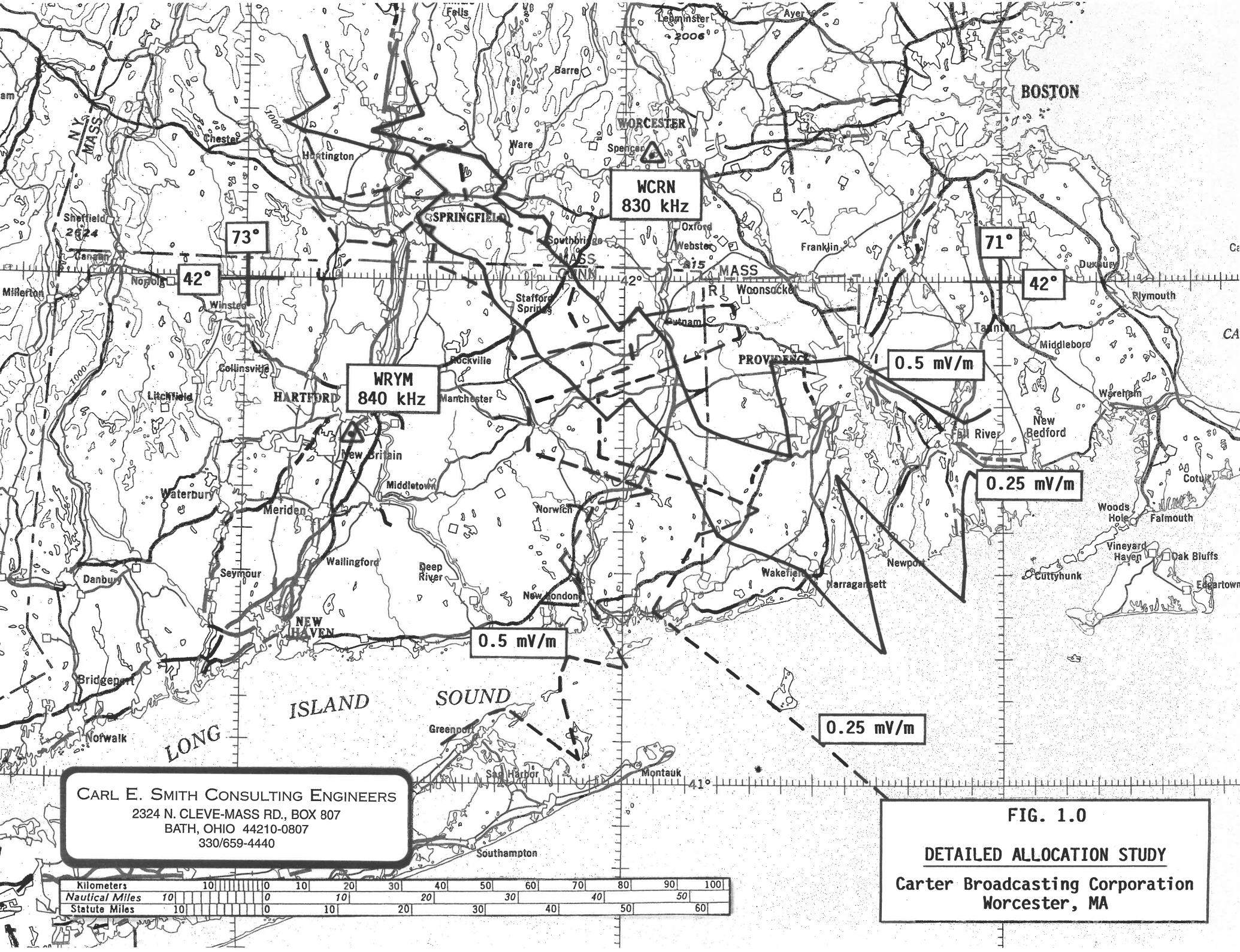
<u>Azimuth (Degrees)</u>	<u>Radiation (mV/m at 1 km)</u>	<u>Conductivities (mmhos/m/ending distance (km))</u>	<u>0.5 mV/m Contour (km)</u>	<u>0.25 mV/m Contour (km)</u>
95	857.3	0.1*	39.04	54.45
100	842.5	2	67.71	91.70
105	825.1	1**/29.8, 2	56.33	80.11
110	805.2	1**/29.8, 2	55.61	79.15
115	782.7	1**/29.8, 2	54.79	78.06
120	757.7	1**/29.8, 2	53.85	76.85

*Measured conductivity data included in the subject WRYM construction permit application (BP-20220630AAD).

**Measured conductivity data extracted from WRYM 1998 full proof of performance (BL-980319KA).

***Measured conductivity data extracted from WCRN 1999 construction permit application (BP-19990524AB).

All other conductivity data extracted from FCC Figure M3.



ADDITIONAL WRYM FIELD STRENGTH MEASUREMENTS

TABLE III

Page 3

**TABULATION OF NON-DIRECTIONAL ANTENNA SYSTEM
MEASUREMENT DATA**

Azimuth: N 68.1 E

Call: WRYM

Frequency: 840.0 kHz

Power: 1.000 kW

Pattern: ND-D

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
1	10-21-1997	16:52	0.37	540.000
2	10-21-1997	16:55	0.44	560.000
3	10-21-1997	17:14	0.56	280.000
4	10-21-1997	17:24	0.70	190.000
5	10-21-1997	17:29	0.75	241.000
6	10-21-1997	17:45	0.88	155.000
7	10-26-1997	09:47	0.99	205.000
8	10-26-1997	09:53	1.06	223.000
9	10-26-1997	10:01	1.26	165.000
10	10-26-1997	10:08	1.34	143.000
11	10-26-1997	10:15	1.44	84.000
12	10-26-1997	10:18	1.48	128.000
13	10-26-1997	10:28	1.63	110.000
14	10-26-1997	10:32	1.67	128.000
15	10-26-1997	10:56	1.81	123.000
16	10-26-1997	10:52	1.88	83.000
17	10-26-1997	11:03	1.94	93.000
18	10-26-1997	11:37	2.05	96.000
19	10-26-1997	14:11	2.13	68.000
20	10-26-1997	11:50	2.19	62.500
21	10-26-1997	12:11	2.76	65.000
22	10-26-1997	12:18	2.83	56.000
23	10-26-1997	12:29	3.00	62.500
24	10-26-1997	12:39	3.12	62.000
25	10-26-1997	12:57	3.50	52.000
26	12-03-1997	10:39	4.09	36.800
27	12-03-1997	10:47	4.82	33.200
28	12-03-1997	10:54	5.54	25.100

TABLE III

Page 4

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
29	12-03-1997	11:03	6.47	20.700
30	12-03-1997	11:15	7.02	17.200
31	12-03-1997	11:32	9.43	13.500
32	12-03-1997	11:39	10.16	11.000
33	12-03-1997	11:47	11.24	12.600
34	12-03-1997	12:00	12.94	8.500
35	12-03-1997	12:13	14.41	5.500
36	12-03-1997	12:22	16.61	3.650
37	12-03-1997	12:37	18.97	2.450
38	12-03-1997	12:55	21.22	1.420
39	12-03-1997	13:07	23.25	1.500
40	12-03-1997	13:16	25.01	0.700
41	12-03-1997	13:28	27.75	0.880
42	12-03-1997	13:40	29.42	0.585
43	12-03-1997	13:52	31.18	0.630

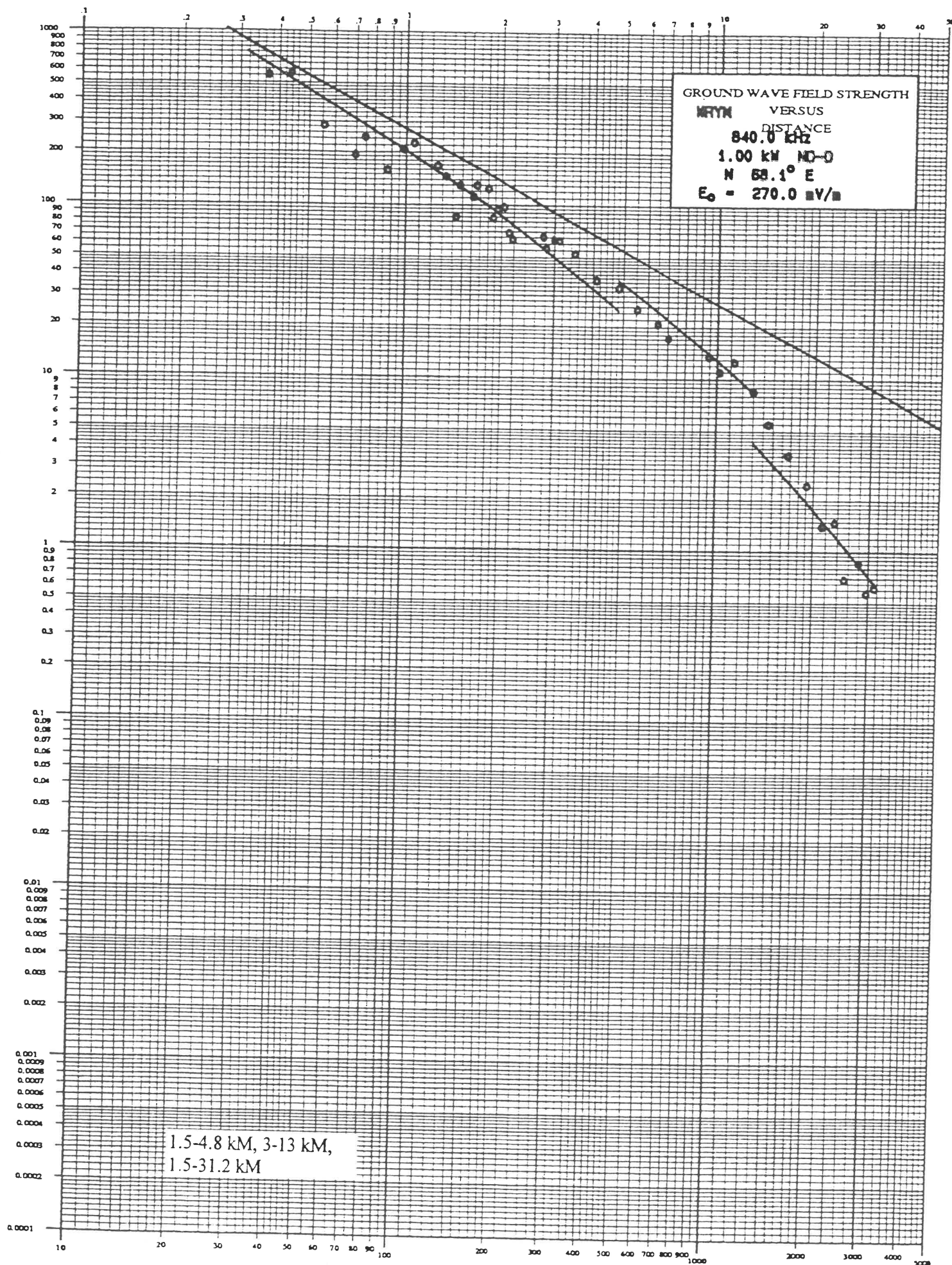


Figure 5

TABLE III

Page 5

**TABULATION OF NON-DIRECTIONAL ANTENNA SYSTEM
MEASUREMENT DATA**

Azimuth: N 113.1 E

Call: WRYM

Frequency: 840.0 kHz

Power: 1.000 kW

Pattern: ND-D

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
1	11-05-1997	13:33	0.37	560.00
2	11-05-1997	13:39	0.44	475.00
3	11-05-1997	13:45	0.55	360.00
4	11-05-1997	13:55	0.64	333.00
5	11-05-1997	13:58	0.69	298.00
6	11-05-1997	14:09	0.85	190.00
7	11-05-1997	14:12	0.94	194.00
8	11-05-1997	14:18	1.08	109.00
9	11-05-1997	14:26	1.35	120.00
10	11-05-1997	14:49	1.55	117.00
11	11-05-1997	15:02	1.73	115.00
12	11-05-1997	15:08	1.78	129.00
13	11-05-1997	15:26	2.03	106.00
14	11-05-1997	15:32	2.15	100.00
15	11-05-1997	15:48	2.24	96.00
16	11-05-1997	15:51	2.30	96.00
17	11-05-1997	15:57	2.43	76.00
18	11-05-1997	16:02	2.53	78.00
19	11-05-1997	16:16	2.79	65.00
20	11-05-1997	16:20	2.90	74.00
21	12-03-1997	15:02	3.67	48.00
22	12-03-1997	15:14	5.23	31.00
23	12-03-1997	15:21	5.80	31.00
24	12-03-1997	15:28	6.36	21.00
25	12-03-1997	15:36	7.04	26.00
26	12-03-1997	15:45	7.75	18.30
27	12-03-1997	15:54	8.36	16.50
28	12-03-1997	16:00	8.81	11.50
29	12-06-1997	11:22	9.93	13.00
30	12-06-1997	11:40	11.18	8.60

TABLE III

Page 6

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
31	12-06-1997	12:04	15.33	2.58
32	12-06-1997	12:17	16.21	2.43
33	12-06-1997	13:00	19.66	1.10
34	12-06-1997	13:20	21.36	1.09
35	12-06-1997	13:31	23.50	0.94
36	12-06-1997	13:42	25.45	0.80
37	12-06-1997	13:52	27.23	0.46
38	12-06-1997	14:01	28.57	0.62
39	12-06-1997	14:10	29.75	0.47

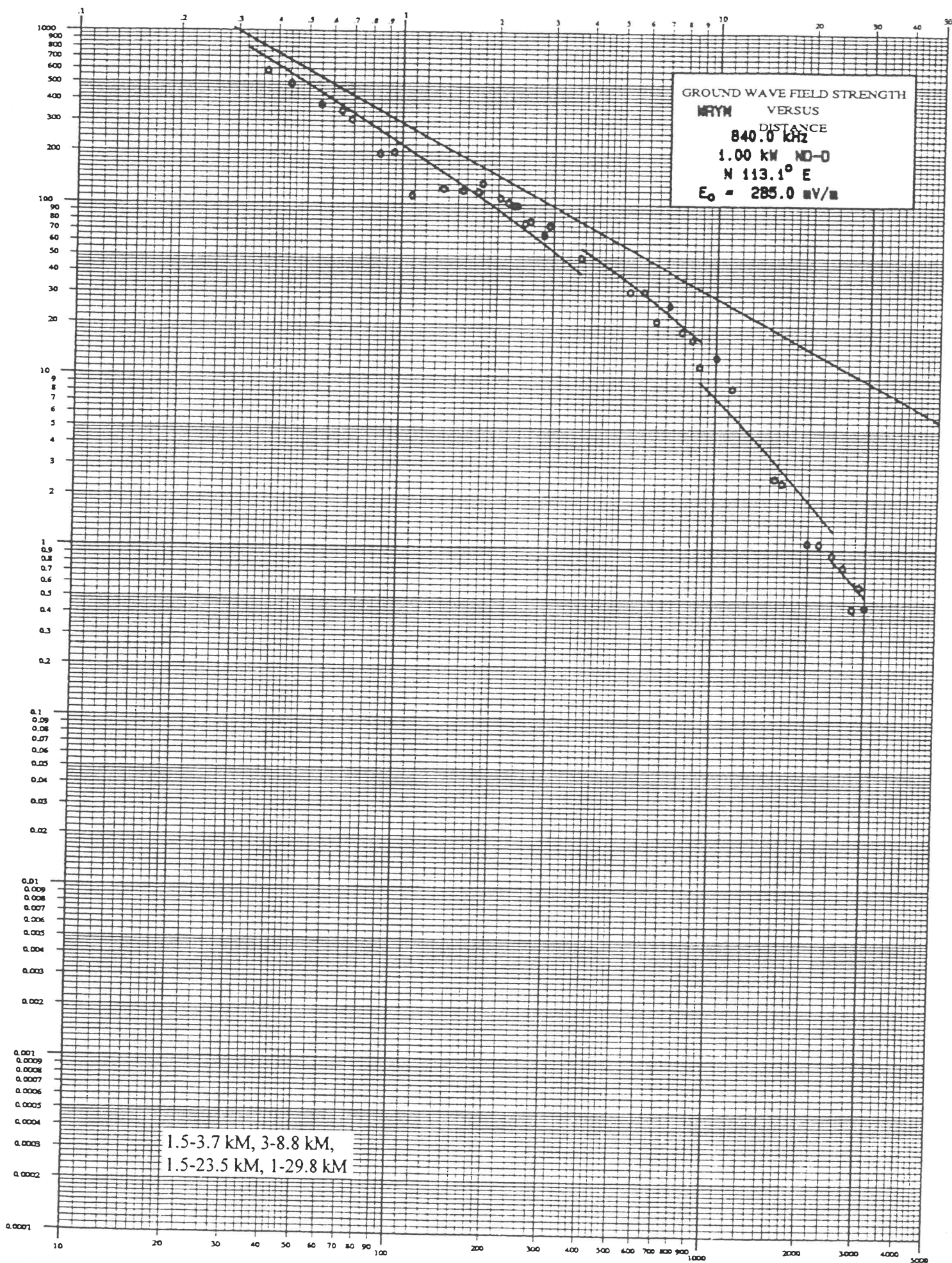


Figure 6

TABLE III

Page 15

**TABULATION OF NON-DIRECTIONAL ANTENNA SYSTEM
MEASUREMENT DATA**

Azimuth: N 338.1 E

Call: WRYM

Frequency: 840.0 kHz

Power: 1.000 kW

Pattern: ND-D

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
1	11-12-1997	11:47	0.37	620.00
2	11-12-1997	11:51	0.46	505.00
3	11-12-1997	11:59	0.55	360.00
4	11-12-1997	12:03	0.62	280.00
5	11-12-1997	12:15	0.84	252.00
6	11-12-1997	12:26	1.05	210.00
7	11-12-1997	12:47	1.26	167.00
8	11-12-1997	12:56	1.36	171.00
9	11-12-1997	13:01	1.45	180.00
10	11-12-1997	13:15	1.59	147.00
11	11-12-1997	13:34	1.66	134.00
12	11-12-1997	13:42	1.77	131.00
13	11-12-1997	14:46	1.89	128.00
14	11-12-1997	14:10	2.82	74.00
15	11-12-1997	14:15	2.91	50.00
16	11-12-1997	14:21	2.96	68.00
17	11-12-1997	14:30	3.20	72.50
18	11-12-1997	14:37	3.31	61.00
19	11-12-1997	14:48	3.40	70.00
20	11-12-1997	14:44	3.50	65.00
21	11-12-1997	14:53	3.56	28.00
22	11-26-1997	11:52	4.00	39.00
23	11-26-1997	12:07	4.40	27.00
24	11-26-1997	12:20	5.06	20.50
25	11-26-1997	12:27	5.56	30.00
26	11-26-1997	12:32	6.15	22.90
27	11-26-1997	12:41	7.13	11.50
28	11-26-1997	12:53	7.70	17.80
29	11-26-1997	13:03	8.46	13.50
30	11-26-1997	13:12	9.10	14.50
31	11-26-1997	13:28	9.96	12.40

TABLE III

Page 16

Point Number	Date	Time	Distance (km)	Field Strength (mV/m)
-----	-----	-----	-----	-----
32	11-26-1997	13:36	10.90	13.60
33	11-26-1997	13:57	12.60	8.50
34	11-26-1997	14:33	15.31	4.05
35	11-26-1997	14:52	17.55	2.70
36	11-26-1997	15:10	19.30	2.15
37	11-26-1997	15:23	21.18	1.61
38	11-26-1997	15:41	23.59	1.14
39	11-26-1997	15:51	25.13	1.11
40	11-29-1997	15:37	27.44	0.78
41	11-29-1997	15:53	32.40	0.400

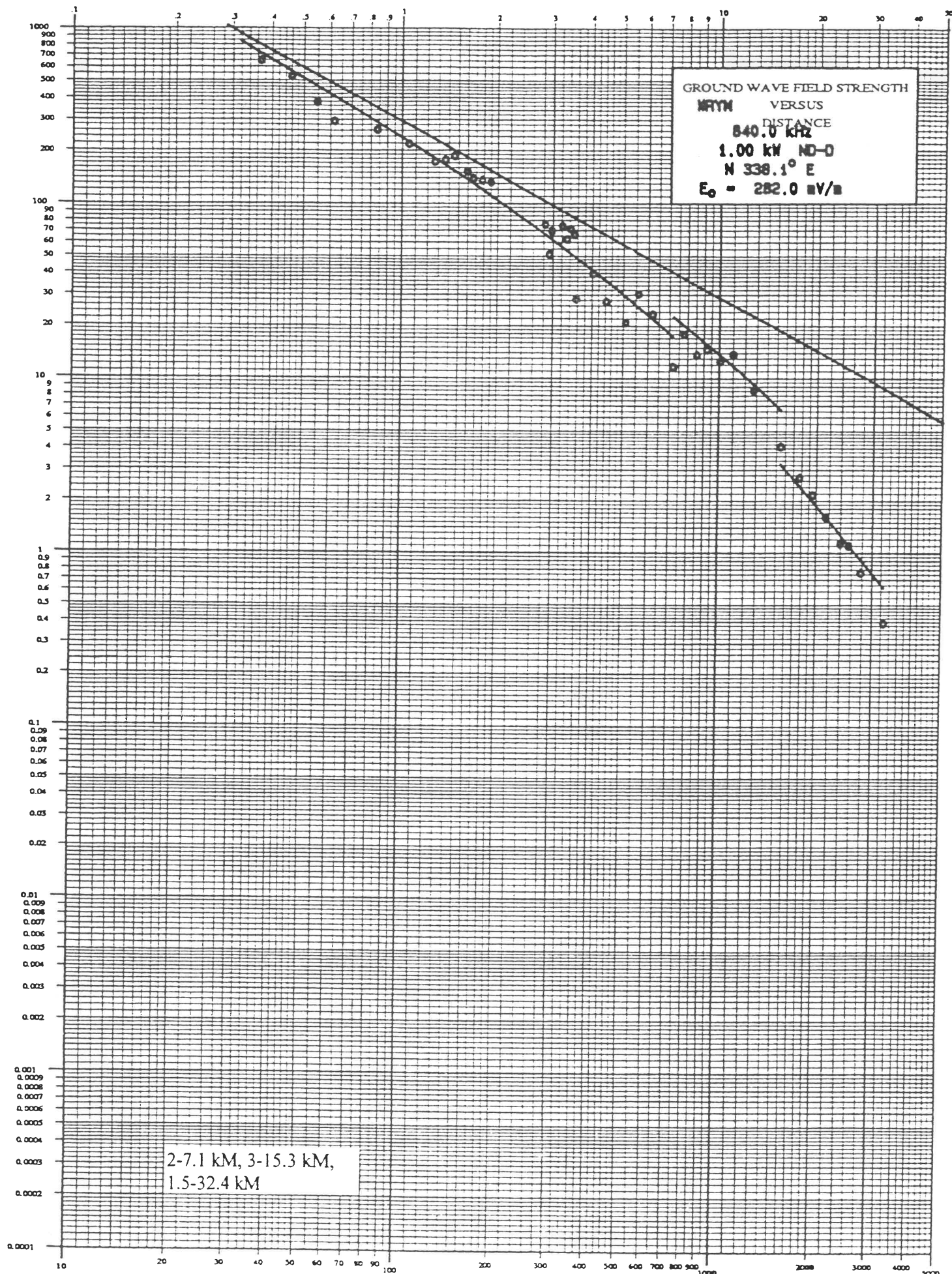


Figure 11

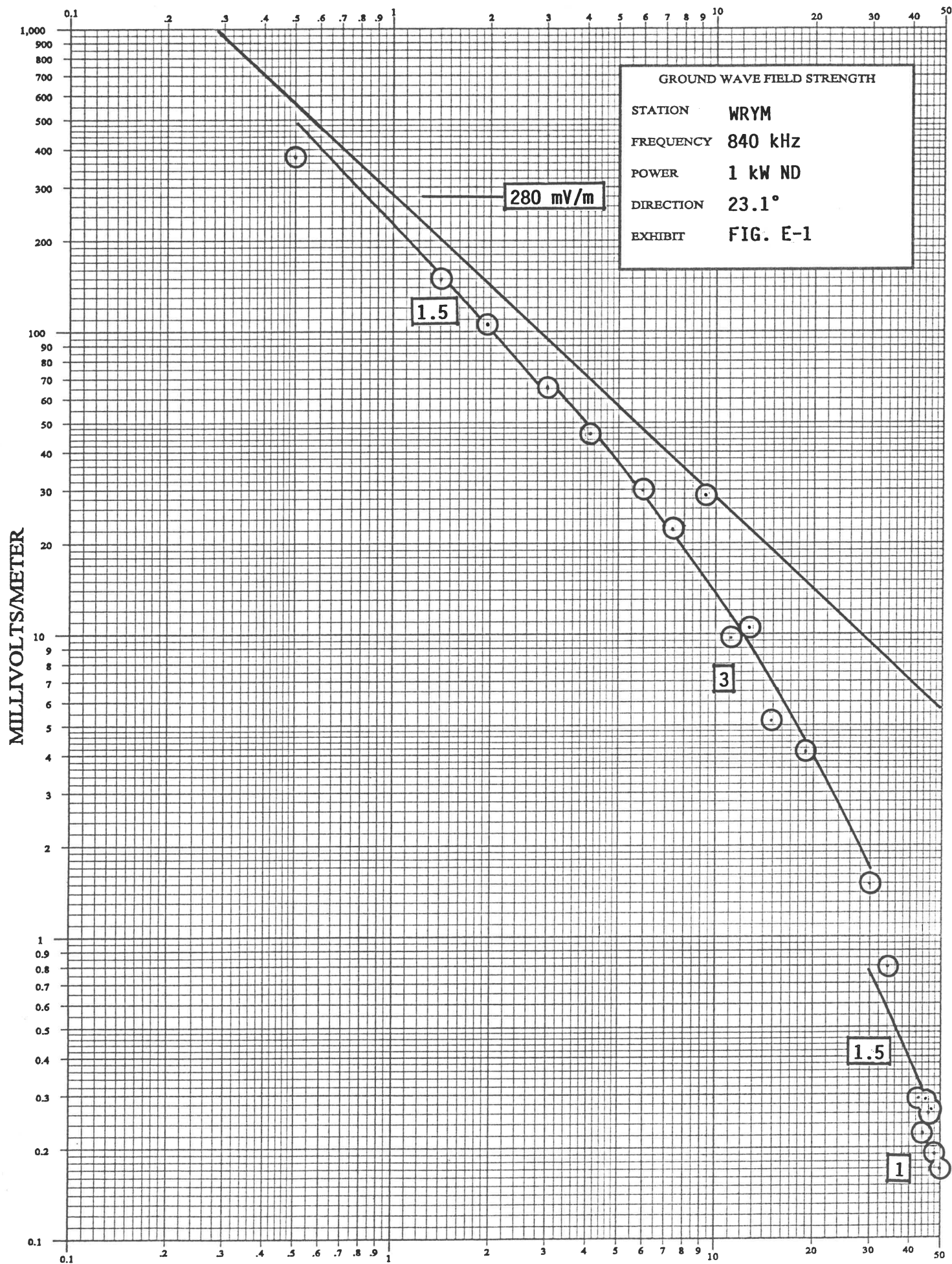
TABLE E-1
 WRYM NONDIRECTIONAL FIELD
STRENGTH MEASUREMENTS - 23.1° RADIAL
 Carter Broadcasting Corp.
 Worcester, MA

<u>Point</u>	<u>Radial Kilometers</u>	<u>Field Strength (mV/m)</u>	<u>Time (EDT)</u>
(10/12/98)			
1	0.50	380	1259
2	1.42	150	1301
3	1.97	105	1309
4	3.00	65.0	1314
5	4.10	46.0	1317
6	5.85	30.0	1321
7	7.38	22.5	1325
8	9.30	29.0	1332
9	11.15	9.80	1348
10	12.76	10.5	1351
11	14.92	5.20	1358
12	19.00	4.10	1404
13	29.80	1.50	1419
14	34.25	0.800	1428
15	42.85	0.290	1445
16	44.37	0.225	1449
17	45.67	0.290	1456
18	46.15	0.260	1458
19	46.82	0.270	1501
20	48.00	0.190	1506
21	49.45	0.170	1510

TABLE E-1 (cont'd)

All points measured by Bob Shotwell using Potomac Instruments FIM-41 S/N 1861.

KILOMETERS FROM ANTENNA



KILOMETERS FROM ANTENNA

CARL E. SMITH CONSULTING ENGINEERS

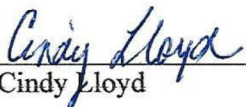
Certificate of Service

The undersigned, an employee of Foster Garvey PC hereby certifies that a copy of the foregoing “Informal Objection” was served this date, by electronic mail:

*Albert Shuldiner, Chief
Audio Division, Media Bureau
Albert.Shuldiner@FCC.gov

*James Bradshaw, Senior Deputy Chief
Audio Division, Media Bureau
James.Bradshaw@FCC.gov

Allan G. Moskowitz, Esq.
10845 Tuckahoe Way
North Potomac, MD 20036
AMOSKOWITZ@AMOSKOWITZLAW.COM
Counsel for Trignition Media LLC


Cindy Lloyd

August 18, 2022