

# pillsbury

# RECEIPT

Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street NW | Washington, DC 20036-3006 | tel 202.663.8000 | fax 202.663.8007

Jessica T. Nyman  
tel: 202.663.8810  
jessica.nyman@pillsburylaw.com

December 22, 2016

VIA HAND DELIVERY

**Accepted / Filed**

**DEC 22 2016**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

Attn:  
Son Nguyen, Supervisory Engineer  
Audio Division, Media Bureau

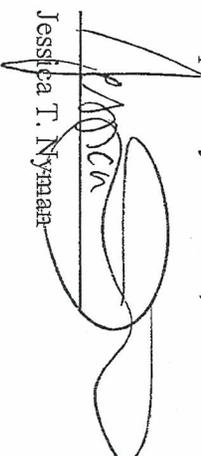
R : ACM JCE IV B LLC  
FRN: 0024486094  
WFTL(AM), W. Palm Beach, FL (FIN: 29490)

Dear Ms. Dortch:

On behalf of ACM JCE IV B LLC, licensee of WFTL(AM), West Palm Beach, Florida, FAC 29490 (the "Station"), the instant application seeks to amend the pending modification of license application, FCC File No. BMM-L-20050104ABJ.

Please direct any communications regarding this matter to the undersigned.

Respectfully submitted,



Jessica T. Nyman

cc (via email): Ed Lubetzky, FCC

FOR  
FCC  
USE  
ONLY

**FCC 302-AM  
APPLICATION FOR AM  
BROADCAST STATION LICENSE**

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY  
FILE NO.

**SECTION I - APPLICANT FEE INFORMATION**

1. PAYOR NAME (Last, First, Middle Initial)

ACM JCE IV B LLC

MAILING ADDRESS (Line 1) (Maximum 35 characters)

426 South River Road

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

Tryon

STATE OR COUNTRY (if foreign address)

NC

ZIP CODE

28782

TELEPHONE NUMBER (include area code)

202-663-8810

CALL LETTERS

WFTL(AM)

OTHER FCC IDENTIFIER (if applicable)

29490

2. A. Is a fee submitted with this application?

Yes  No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

Governmental Entity  Noncommercial educational licensee

Other (Please explain): Amendment to FCC File No.

BMML - 20050104ABJ

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)	(B)	(C)
FEE TYPE CODE	FEE MULTIPLE	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
	0 0 0 1	\$
		FOR FCC USE ONLY

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)
	0 0 0 1	\$
		FOR FCC USE ONLY

ADD ALL AMOUNTS SHOWN IN COLUMN C,  
AND ENTER THE TOTAL HERE.  
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED  
REMITTANCE.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY
\$	

SECTION II - APPLICANT INFORMATION

1. NAME OF APPLICANT ACM JOE IV B LLC		
MAILING ADDRESS 426 South River Road		
CITY Tryon	STATE NC	ZIP CODE 28782

2. This application is for:

- Commercial       Noncommercial  
 AM Directional       AM Non-Directional

Call letters WFTL(AM)	Community of License West Palm Beach	Construction Permit File No.	Modification of Construction Permit File No(s).	Expiration Date of Last Construction Permit
--------------------------	---	------------------------------	---	---

3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

Yes  No

Exhibit No.  
directional PTA

If No, explain in an Exhibit.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

Yes  No

Exhibit No.

If No, state exceptions in an Exhibit.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

Yes  No

Exhibit No.

If Yes, explain in an Exhibit.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

Yes  No

Does not apply

Exhibit No.

If No, explain in an Exhibit.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

Yes  No

Exhibit No.

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

Yes  No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

### CERTIFICATION

Yes  No

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 882, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name	Signature	
Mark Jorgenson		
Title	Date	Telephone Number
Sole Member of Licensee's Sole Member	12/21/2016	828-859-6982

**WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR  
CONSTRUCTION**

### FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law-enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3080-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

**SECTION III - LICENSE APPLICATION ENGINEERING DATA**

Name of Applicant  
**ACM JCE IV B LLC**

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

Station License       Direct Measurement of Power

1. Facilities authorized in construction permit						
Call Sign <b>WFTL</b>	File No. of Construction Permit (if applicable) BMP20031024AAV	Frequency (KHz) 850	Hours of Operation Unlimited	Power In Kilowatts		
				Night 20	Day 50	
2. Station location						
State <b>Florida</b>	City or Town <b>West Palm Beach</b>					
3. Transmitter location						
State	County	City or Town	Street address (or other identification)			
4. Main studio location						
State	County	City or Town	Street address (or other identification)			
5. Remote control point location (specify only if authorized directional antenna)						
State	County	City or Town	Street address (or other identification)			

6. Has type-approved stereo generating equipment been installed?  
 Yes     No
7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.687?  
 Yes     No     Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.       Exhibit No. see eng-form

8. Operating constants:						
RF common point or antenna current (in amperes) without modulation for night system <b>20.5</b>			RF common point or antenna current (in amperes) without modulation for day system <b>32.4</b>			
Measured antenna or common point resistance (in ohms) at operating frequency Night <b>50</b> Day <b>50</b>			Measured antenna or common point reactance (in ohms) at operating frequency Night <b>0</b> Day <b>0</b>			
Antenna Indications for directional operation						
Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day
1	-97.3	-111.1	0.383	0.681		
2	ref 0.0	ref 0.0	ref 1.00	ref 1.00		
3	+106.9	+129.8	0.544	0.480		
4	-117.4	-145.0	0.358	0.432		
5	-28.1	-43.5	1.549	1.288		
6	+83.2	+85.2	0.973	0.762		
Manufacturer and type of antenna monitor: <b>Potomac Instruments 1901-6</b>						

CLEAR ALL PAGES

SECTION III - Page 2

9. Description of antenna system (if directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lightning)	Overall height in meters above ground (include obstruction lightning)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
Guyed	See eng str	see eng str	see eng str	Exhibit No.

Excitation

Series

Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	26 ° 32 ' 30 "	West Longitude	80 ° 44 ' 30 "
----------------	----------------	----------------	----------------

If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?  
 none

11. Give reasons for the change in antenna or common point resistance.

MOM proof

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Timothy C. Cutforth	Signature (check appropriate box below) <i>Timothy C Cutforth</i>
Address (Include ZIP Code) Broadcast Engineering Consultants 965 S. Irving Street Denver, CO 80219	Date 12/21/2016
	Telephone No. (Include Area Code) 303-912-5474

Technical Director

Registered Professional Engineer

Chief Operator

Technical Consultant

Other (specify)

Form 302-AM

December 22, 2016 Amendment

WFTL(AM), West Palm Beach, FL (Facility ID 29490)

---

This amendment is being submitted to address questions from FCC staff.

1) Derivation of Operating Parameters for Daytime Directional Antenna

Once calibrated against the measured individual open-circuited base impedances, the moment method model was utilized for daytime directional antenna calculations. These calculations were made to determine the complex voltage source values to be applied at ground level for each tower of the array to produce the current moment sums for the towers which, when normalized to the reference tower, equate to the theoretical field parameters of the authorized directional pattern. These voltage sources were then applied in the model and the tower currents were calculated.

Twenty segments were used for each tower. The WFTL towers are base sampled, which is permitted for towers of 120 electrical degrees or less. As such, the first (ground) segment of each tower was used to determine the model operating parameters of the array.

A circuit model was constructed to determine the effect of the series feed inductance, and shunt base region capacitance on the ATU output current. The circuit model for each tower is essentially the circuit model used for model verification above using the model-predicted operating impedance for each tower. Again, this model was used with the Westberg Circuit Analysis Program (WCAP).

This effect was, as expected, minimal, and the results are tabulated in the table below along with the base operating parameters for the daytime array.

Twr.	Node	Current Magnitude (amperes)	Current Phase (degrees)	WCAP Current Offset for Unity $I_{base}$	WCAP Phase Offset for Unity $\theta_{base}$ (degrees)	Antenna Monitor Ratio	Antenna Monitor Phase (degrees)
1	1	15.1554	+11.8	0.974	1.747	0.681	-111.1
2	21	22.4062	+123.9	0.968	0.767	1.00ref	0.0ref
3	42	10.8161	-105.9	0.963	0.403	0.480	129.8
4	64	9.7406	-23.3	0.962	+2.940	0.432	-145.0
5	87	28.1784	+80.9	0.9915	+0.308	1.288	-43.5
6	107	16.6179	-170.1	0.9944	-0.061	0.762	+65.2

2) Page 4 of the Form has been updated to reflect the information in item 1, above.

3) Derivation of Operating Parameters for Nighttime Hours Directional Antenna

Once calibrated against the measured individual open-circuited base impedances, the moment method model was utilized for nighttime directional antenna calculations. These calculations were made to determine the complex voltage source values to be applied at ground level for each tower of the array

to produce the current moment sums for the towers which, when normalized to the reference tower, equate to the theoretical field parameters of the authorized directional pattern. These voltage sources were then applied in the model and the tower currents were calculated.

Twenty segments were used for towers 1, 5, and 6, and the number of segments increasing with the actual tower height so that the segments are similar length for all towers. The WFTL towers are base sampled, which is permitted for towers of 120 electrical degrees or less. As such, the first (ground) segment of each tower was used to determine the model operating parameters of the array.

A circuit model was constructed to determine the effect of the series feed inductance, and shunt base region capacitance on the ATU output current. The circuit model for each tower is essentially the circuit model used for model verification above using the model-predicted operating impedance for each tower. Again, this model was used with the Westberg Circuit Analysis Program (WCAP).

This effect was, as expected, minimal, and the results are tabulated in the table below along with the base operating parameters for the nighttime array.

Twr.	Node	Current Magnitude (amperes)	Current Phase (degrees)	WCAP Current Offset for Unity $I_{base}$	WCAP Phase Offset for Unity $\phi_{base}$ (degrees)	Antenna Monitor Ratio	Antenna Monitor Phase (degrees)
1	1	5.1810	-69.4512	0.971	+3.331	0.383	-97.3
2	21	13.5459	30.066	0.969	+1.157	1.00ref	0.0ref
3	42	7.3854	137.855	0.968	+0.317	0.544	106.9
4	64	4.9409	-89.731	0.953	3.472	0.358	-117.4
5	87	20.5392	2.776	0.9905	+0.366	1.549	-28.1
6	107	12.8954	114.582	0.991	-0.132	0.973	+83.2

4) Page 4 of the Form has been updated to reflect the information in item 3, above.

5)

The surveying document states that "TRUE NORTH IS 06 Min 56 Sec East of Grid North".

The specification "East of Grid North" specifies that it is rotated clockwise towards the East.

While it is true that the offset between TRUE NORTH and Grid North is 06 Minutes 56 Seconds, it is necessary to envision the two compass roses for Grid North and TRUE NORTH to get a clear picture.

The TRUE NORTH bearing of 0 Degrees 0 Minutes 0.0 Seconds is equal to a Grid North bearing of 0 Degrees 06 Minutes 56 Seconds.

The equivalent TRUE NORTH bearing of Grid North is 359 Degrees 53 Minutes 04 Seconds which is 06 Minutes 56 Seconds less than the Grid North Bearing. The TRUE NORTH bearing is therefore the Grid North bearing less 06 Minutes 56 Seconds. Therefore 06 Min 56 Sec is subtracted.

6) The FAA has verified the WFTL tower registration filings and initiated an aeronautical study. The FAA requests a minimum of 45 days to complete the study. The FAA has assigned the following Aeronautical Study Numbers (ASN):

- 2016-ASO-30728-OE
- 2016-ASO-30729-OE
- 2016-ASO-30730-OE
- 2016-ASO-30731-OE
- 2016-ASO-30732-OE
- 2016-ASO-30733-OE

7)

The reference measurements submitted previously were measured within 5% and 3 degrees of the proposed license parameters as tabulated below. Therefore the reference measurements for both the daytime and the nighttime operating parameters are valid as submitted.

DAYTIME Operating Parameters for reference measurements

Tower	302 Ratio	Op Ratio	302 Phase	Op Phase
1)	0.681	0.688 (+1.03%)	-111.1	-111.1 (0.0 deg)
2)	1.000	1.000 (ref)	0.0	0.0 (ref)
3)	0.480	0.479 (0.21%)	+127.8	+129.9 (+2.1 deg)
4)	0.432	0.433 (+0.23%)	-145.0	-145.2 (-0.2 deg)
5)	1.288	1.307 (+1.48%)	-43.5	-43.9 (-0.4 deg)
6)	0.762	0.754 (-1.05%)	+65.2	+64.6 (-0.6 deg)

NIGHTTIME Operating Parameters for reference measurements

Tower	302 Ratio	Op Ratio	302 Phase	Op Phase
1)	0.383	0.384 (+0.26%)	-97.3	-97.4 (-0.1 deg)
2)	1.000	1.000 (ref)	0.0	0.0 (ref)
3)	0.544	0.544 (0.0 %)	+106.9	+105.9 (-1.0 deg)
4)	0.358	0.358 (0.0 %)	-117.4	-120.3 (-2.9 deg)
5)	1.549	1.550 (+0.1 %)	-28.1	-28.1 (0.0 deg)
6)	0.973	0.995 (2.26%)	+83.2	+83.3 (-0.1 deg)