

WOMBLE
CARLYLE
SANDRIDGE
& RICE

A PROFESSIONAL LIMITED
LIABILITY COMPANY

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Peter Gutmann
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January 13, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
P.O. Box 358200
Pittsburgh, PA 15251-5200

Re: WJNT (AM), Pearl, MS (Facility ID No. 7691)
Buchanan Broadcasting Company, Inc.
FRN: 0001-7483-26
Request for Special Temporary Authority to Operate FM Translator

EXPEDITED CONSIDERATION REQUESTED

Dear Ms. Dortch:

Buchanan Broadcasting Company, Inc. ("Buchanan"), by its attorney, hereby respectfully requests special temporary authority ("STA") to operate an FM translator in Pearl, Mississippi on Channel 277 during nighttime hours in order to replicate the service on its station WJNT(AM), Pearl, Mississippi which would otherwise be impaired by debilitating interference from station CMGL, Havana, Cuba.

In support of this request, we respectfully note that similar relief was initially requested on March 19, 1999 (supplemented on August 6, September 13, November 19 and December 17, 1999) and then again on February 17, 2004. In its initial request, Buchanan had noted that its nighttime signal was being completely overrun by that of station CMGL which, although authorized for 10 kW, appeared to be operating with at least 200 kW. WJNT was unable to counter the interference by proposing a power increase of its own due to a need to protect co-channel stations KGOL, Mason City, Iowa and KOIL, Bellevue, Nebraska. Buchanan submitted extensive field measurements documenting the strength of the Cuban station's signal at various locations within the WJNT coverage area and cited numerous complaints by its frustrated listeners who had come to depend upon its unique news/talk format but were no longer able to receive it. Invoking the policies which had led Congress to adopt the *Radio Broadcast to Cuba Act of 1983*, Buchanan requested operation on an FM translator to provide fill-in service to its authorized service area.

In a December 20, 1999 letter, Commission staff acknowledged the need for relief and authorized operation of WJNT-FM1 on Channel 280 for six months during nighttime hours with the following facilities:

North Latitude: 32°16'22"
West Longitude: 90°06'00"
Effective Radiated Power: 0.500 kW
Height of Radiation Center Above Ground: 25 meters
Height of Radiation Center Above Mean Sea Level: 166 meters
Height of Radiation Center Above Average Terrain: 74 meters
Tower Height Above Ground: 27.4 meters
Antenna Registration Number: 1207504

A timely STA extension was requested on June 21, 2000, but remained pending due to an informal objection which had been filed by a competitor. By letter of February 2, 2004 Commission staff dismissed the informal objection but denied an extension and cancelled the STA due to a recent authorization for LPFM station WLEZ-LP, Jackson, Mississippi on Channel 279.

WJNT then determined that operation on Channel 282 using the same facilities as in its previous STA (listed above) would enable it to resume operation and filed a request for further STA. The Commission granted the relief on February 19, 2004, but subject to a condition that the STA was to terminate upon commencement of operation by co-channel LPFM station WPWS-LP, Piney Woods, Mississippi. By letter of December 16, 2004 (but not mailed until much later and not received until January 6, 2005), FCC staff noted that WPWS-LP had filed a license application certifying commencement of operations and therefore cancelled Buchanan's STA.

As noted in the engineering statement submitted herewith, Buchanan has determined that it can operate with STA using the same parameters as above, but on channel 277. The only area of interference, to second adjacent channel station WMSI-FM, Jackson, Mississippi, is unpopulated and uninhabitable, as it is owned by the city of Pearl and used for water supply tanks and landfill purposes. Accordingly, Buchanan requests STA to enable it to resume operation.

We note that there has been no change in the conditions which precipitated the need for WJNT's previous STA. Interference from Cuba still obliterates most reception of WJNT within its protected nighttime service area. Accordingly, we submit that the same factors which led to the grant of WJNT-FM1 apply with equal force to the instant request.

Buchanan respectfully requests expedited processing of the instant STA request. WJNT is a news/talk station that provides unique programming to its community and listeners. Unfortunately, the staff's December 16 (not received until January 6, due to FCC mailing delays)

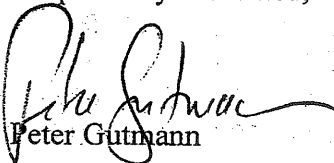
letter came with no advance warning and provided no opportunity to apprise listeners of the cancellation of WJNT's STA.

WJNT's listeners have come to depend upon the station's service, not only for its unique news/talk format, but also to receive nighttime (and, in the winter, late afternoon and evening) traffic and weather information. Of particular concern to the WJNT service area are flood warnings, including Emergency Alert System activations. Buchanan fears that public safety may be severely compromised by the loss of its ability to convey critical information of this type to its listeners outside of daytime hours. In order to preserve such service, expedited processing is respectfully requested.

Submitted herewith is the applicant's Anti-Drug Abuse Act Certification and a Remittance Advice (FCC Form 159) containing credit card information for payment of the requisite \$150 STA filing fee.

We respectfully urge the staff to enable Buchanan to recommence STA operations on Channel 277, as proposed herein, at the very earliest opportunity in order to resume the level of public service upon which its listeners have come to depend.

Respectfully submitted,



Peter Gutmann

Enclosures

cc: Robert Buchanan (LPF)
Charles N. Miller, Esquire (via email)

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STAMP & RETURN

January 13, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
P.O. Box 358200
Pittsburgh, PA 15251-5200

FCC/MELLON
JAN 13 2005

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FRN: 0001-7483-26
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READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3060-0589
Page 1 of 1

(1) LOCKBOX # 358200		SPECIAL USE ONLY	
		FCC USE ONLY	
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Womble Carlyle Sandridge & Rice		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$150.00	
(4) STREET ADDRESS LINE NO. 1 1401 Eye Street, NW			
(5) STREET ADDRESS LINE NO. 2 7th Floor			
(6) CITY Washington		(7) STATE DC	(8) ZIP CODE 20005
(9) DAYTIME TELEPHONE NUMBER (include area code) 202-467-6900		(10) COUNTRY CODE (if not in U.S.A.) US	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0006639652		(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME Buchanan Broadcasting Company, Inc.			
(14) STREET ADDRESS LINE NO. 1 1985 Lakeland Drive			
(15) STREET ADDRESS LINE NO. 2 P.O. Box 1248			
(16) CITY Jackson		(17) STATE MS	(18) ZIP CODE 39216
(19) DAYTIME TELEPHONE NUMBER (include area code) 601-353-2724		(20) COUNTRY CODE (if not in U.S.A.) USA	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0001748326		(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID WJNT (AM)	(24A) PAYMENT TYPE CODE MGF	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$150.00	(27A) TOTAL FEE \$150.00	FCC USE ONLY	
(28A) FCC CODE 1 7691		(29A) FCC CODE 2	
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2	
SECTION D - CERTIFICATION			
CERTIFICATION STATEMENT I, _____, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief. SIGNATURE _____ DATE _____			
SECTION E - CREDIT CARD PAYMENT INFORMATION			
MASTERCARD _____ VISA <input checked="" type="checkbox"/> AMEX _____ DISCOVER _____			
ACCOUNT NUMBER _____		EXPIRATION DATE 3/05	
I hereby authorize the FCC to charge my credit card for the service(s)/authorization herein described.			
SIGNATURE <i>Greg B. Kline</i>		DATE 1/13/05	

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

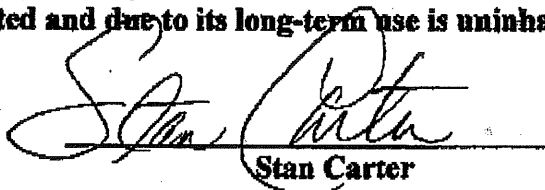
FEBRUARY 2003 (REVISED)

DECLARATION UNDER PENALTY OF PERJURY

Stan Carter states under penalty of perjury that the following is true and correct of his personal knowledge:

- 1. I am Chief Engineer of Buchanan Broadcasting Co., Inc., licensee of AM station WJNT, Pearl, MS. We seek authority to operate WJNT-FM1 under Special Temporary Authority.**
- 2. I have reviewed the Engineering Statement prepared by Reynolds Technical Associates depicting operation of the STA on Channel 277. I am familiar with the area of potential interference to WSMI-FM, as shown in Exhibit E, Figure 1 of the Engineering Statement. This entire area is owned by the city of Pearl and is used for water supply tanks and landfill purposes. It is unpopulated and due to its long-term use is uninhabitable.**

January 12, 2005


Stan Carter

ANTI-DRUG ABUSE ACT CERTIFICATION

I hereby certify that neither Buchanan Broadcasting Co., Inc. nor any of its principals
Has been subject to a denial of federal benefits under Section 5301 of the Anti-Drug
Abuse Act of 1988.

BUCHANAN BROADCASTING CO., INC.

By:

Robert M. Buchanan, Jr. President

Robert M. Buchanan, Jr., President

Date: *1/12/05*

ENGINEERING STATEMENT

**In Support of a Request for
Special Temporary Authority
for a Nighttime FM Booster**

for

WJNT (AM)

Pearl, Mississippi

Channel 277 – 103.3 MHz

ERP: 0.50 kW(H&V)

January, 2005



General

As broadcast technical consultants doing business as Reynolds Technical Associates (RTA), we have been authorized by Buchanan Broadcasting Co, Inc., to conduct and prepare engineering studies in support of a Special Temporary Authority (STA) to operate a nighttime only FM booster for WJNT(AM) licensed to Pearl, Mississippi.

The facility is to operate on channel 277 with a non-directional antenna and the effective radiated power of 0.5 kilowatts with an antenna height of 165.2 meters AMSL.

The WJNT-FM1 facility is to broadcast the programming of WJNT(AM) of Pearl, Mississippi, by receiving the programming from the main studio of WJNT(AM) by the used of STL (microwave).

WJNT's licensee, Buchanan Broadcasting Co, Inc., is the same entity filing the instant FM booster application.

The following engineering studies and exhibits support the instant application study results.

The Protected and Interfering Contours Studies
(Exhibit E, Figure 1)

A detailed study was performed that determined channel 277 could be used for a booster site by using the signal level of WMSI-FM (channel 275) for reference. The signal level of WMSI-FM at the proposed site is 88.38 dBu F(50,50). According to 73.215 (2) of the Commission's Rules, the second adjacent channel's F(50,10) interfering contour must be 40 dB higher than the protected contour of the facility offered protection. The interfering contour would therefore be 128.38 dBu F(50,10). Exhibit E, Figure 1 is a map depicting the protected contour of WMSI-FM and the interfering contour of the proposed FM booster. The 128.38 dBu F(50,10) contour of the proposed booster extends 60 meters from the proposed site. There is no population within the proposed 128.38 dBu F(50,10). It was determined that the signal level of 109.6 dBu F(50,10) was the point where population started. 74.1204(d) of the Commission's Rules states that prohibited overlap will not apply where the area of such overlap has lack of population.

Terrain and Contour Study
(Exhibit E, Figure 2)

Exhibit E, Figure 2 is the terrain averaging and contour study to the proposed FM booster.

The antenna structure registration number for the existing tower is 1207504.

There are no proposed or authorized FM or TV transmitters that may produce receiver-induced interference within ten (10) kilometers of the proposed.

Human Exposure
(No Exhibits)

The proposed FM facility was evaluated in terms of potential radiofrequency radiation exposure at ground level.

The antenna for the applicant's proposed FM broadcast station is to be placed on an existing tower. The proposed center of radiation was rounded to 25 meters above ground, with an ERP (both horizontally and vertically) of 0.5 kW. The controlled/occupational limit, as well as the uncontrolled/general public limit is in compliance. Power density two (2) meters above ground is 0.063 mW/cm^2 , well below the maximum allowable limit of 0.2 mW/cm^2 for uncontrolled/general public exposure limits as well as the 1.0 mW/cm^2 for controlled/occupational exposure limits.

Should anyone be required to climb the tower, the facilities located on the tower have an agreement to either reduce power or cease operation, whichever is necessary, to prevent hazardous exposure to radiofrequency radiation.

Conclusion

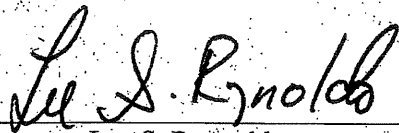
This statement has been prepared for Buchanan Broadcasting Co., Inc. by utilizing the latest available information, cross-checked with the Federal Communications Commission and other sources. Therefore, it is submitted that the proposed is in compliance with the Commission's Rules and Regulations and other sources. Therefore, it is submitted that the engineering data compiled and demonstrated herein for the proposed is in compliance with Commission's Rules and Regulations at the time of this application's filing date. We welcome the opportunity to discuss with the staff of the Federal Communications Commission the engineering data contained in this application. Should any questions arise concerning the information, please contact us.

The following pages are exhibits prepared and assembled in support of the proposed.

Lee S. Reynolds
12585 Old Highway 280 East
Chelsea, Alabama 35043
(205) 618-2020

Leon Strickland
12585 Old Highway 280 East
Chelsea, Alabama 35043
(205) 618-2020

For Strickland and Reynolds:



Lee S. Reynolds

January 12th, 2005



12585 Old Highway 280 East
Chelsea, Alabama 35043
(205) 618-2020

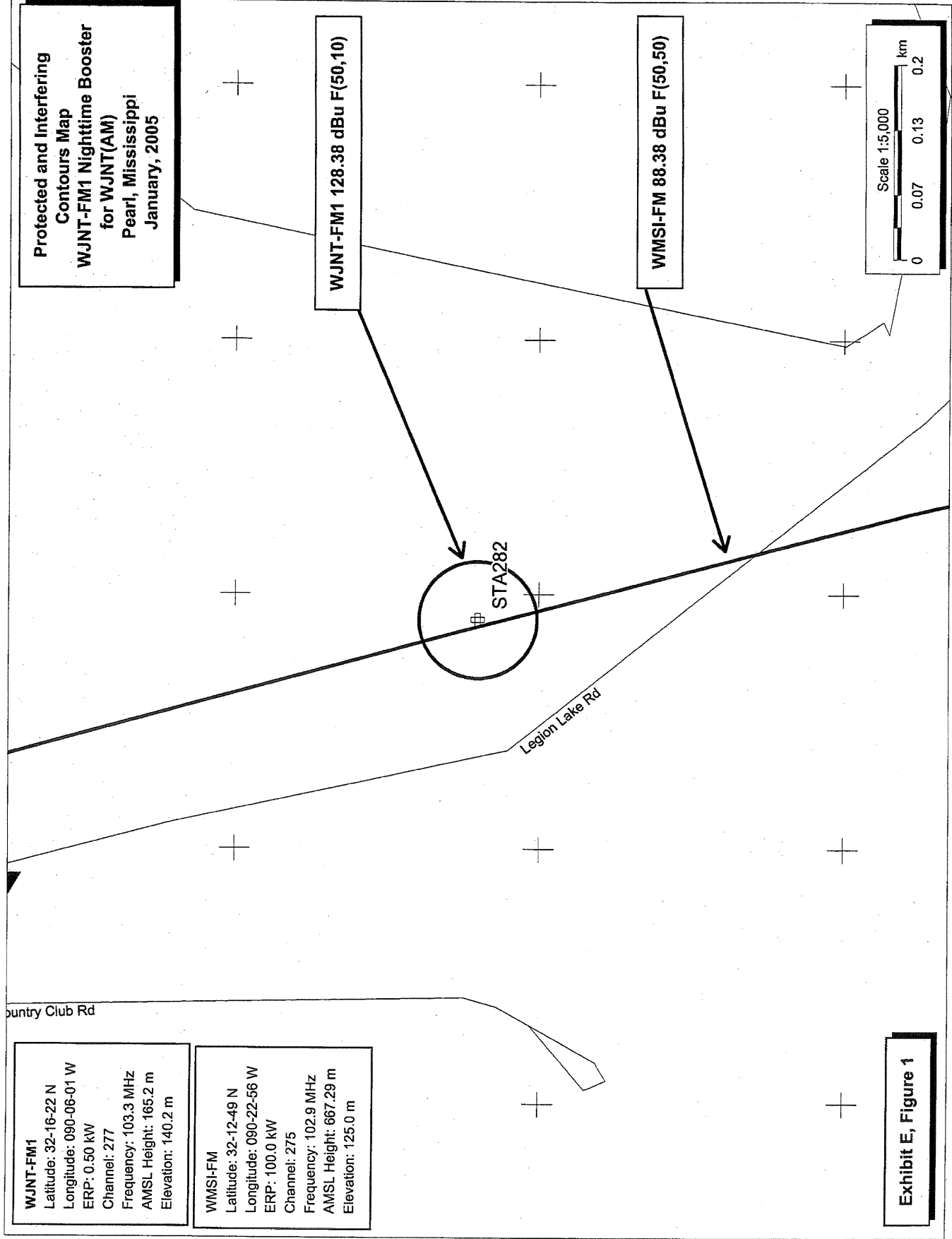


Exhibit E, Figure 1



Engineering Statement
In Support of a Request for
Special Temporary Authority
for a Nighttime FM Booster

WJNT-FM1, Pearl, Mississippi
Channel 277

Terrain-Contour Study for Booster Facility

Reference Coordinates:

North Latitude: 32-16-22

West Longitude: 90-06-01

ERP = 0.50 kW		FM - 2-6 Tables		F(50-50)
Ave. Elev.		Effective		Distance to
3 to 16 km		Antenna Height		60 dBu Contour
Azimuth	Meters AMSL	Meters AAT	ERP	km
°T.			(dBk)	
0	84.6	80.6	-3.010	13.7
5	82.4	82.8	-3.010	13.9
10	82.1	83.1	-3.010	13.9
15	83.6	81.6	-3.010	13.8
20	86.7	78.5	-3.010	13.5
25	93.3	71.9	-3.010	13.0
30	97.3	67.9	-3.010	12.7
35	99.6	65.6	-3.010	12.5
40	103.0	62.2	-3.010	12.2
45	106.8	58.4	-3.010	11.9
50	105.2	60.0	-3.010	12.0
55	110.2	55.0	-3.010	11.5
60	116.8	48.4	-3.010	10.8
65	118.5	46.7	-3.010	10.6
70	122.4	42.8	-3.010	10.2
75	121.9	43.3	-3.010	10.2
80	117.3	47.9	-3.010	10.8
85	119.9	45.3	-3.010	10.5
90	119.0	46.2	-3.010	10.6
95	116.3	48.9	-3.010	10.9
100	113.2	52.0	-3.010	11.2
105	111.1	54.1	-3.010	11.5
110	110.8	54.4	-3.010	11.5
115	109.2	56.0	-3.010	11.6
120	106.3	58.9	-3.010	11.9
125	102.8	62.4	-3.010	12.2
130	99.5	65.7	-3.010	12.5
135	96.0	69.2	-3.010	12.8
140	97.1	68.1	-3.010	12.7
145	97.9	67.3	-3.010	12.6
150	95.2	70.0	-3.010	12.8
155	99.3	65.9	-3.010	12.5

Continued on the next page

Exhibit E, Figure 2

ERP =	0.50 kW	FM - 2-6 Tables		F(50-50)
Azimuth	Ave. Elev.	Effective	ERP	Distance to
°T.	3 to 16 km	Antenna Height	(dBk)	70 dBu Contour
	Meters AMSL	Meters AAT		km
160	102.9	62.3	-3.010	12.2
165	102.8	62.4	-3.010	12.2
170	101.2	64	-3.010	12.3
175	101.6	63.6	-3.010	12.3
180	100.2	65.0	-3.010	12.4
185	98.5	66.7	-3.010	12.6
190	96.5	68.7	-3.010	12.7
195	101.9	63.3	-3.010	12.3
200	101.5	63.7	-3.010	12.3
205	106.1	59.1	-3.010	11.9
210	101.7	63.5	-3.010	12.3
215	95.2	70.0	-3.010	12.8
220	88.4	76.8	-3.010	13.4
225	80.1	85.1	-3.010	14.1
230	77.9	87.3	-3.010	14.3
235	78.9	86.3	-3.010	14.2
240	81.0	84.2	-3.010	14.0
245	83.2	82.0	-3.010	13.8
250	83.3	81.9	-3.010	13.8
255	84.5	80.7	-3.010	13.7
260	85.6	79.6	-3.010	13.6
265	88.3	76.9	-3.010	13.4
270	90.8	74.4	-3.010	13.2
275	89.0	76.2	-3.010	13.3
280	88.0	77.2	-3.010	13.4
285	88.9	76.3	-3.010	13.3
290	89.1	76.1	-3.010	13.3
295	88.9	76.3	-3.010	13.4
300	89.9	75.3	-3.010	13.3
305	92.6	72.6	-3.010	13.1
310	94.9	70.3	-3.010	12.9
315	94.9	70.3	-3.010	12.9
320	89.3	75.9	-3.010	13.3
325	90.5	74.7	-3.010	13.2
330	92.6	72.6	-3.010	13.0
335	90.1	75.1	-3.010	13.3
340	89.8	75.4	-3.010	13.3
345	88.2	77.0	-3.010	13.4
350	86.0	79.2	-3.010	13.6
355	83.9	81.3	-3.010	13.8