

APPLICATION FOR PROGRAM TEST AUTHORITY  
AND STATION LICENSE  
PARTNERSHIP RADIO, LLC  
WUBU (FM) RADIO STATION  
CH 292A - 106.3 MHZ - 1.4 kW - DA  
SOUTH BEND, INDIANA  
April 2016

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Partnership Radio, LLC ("Partnership Radio"), licensee of radio station WUBU, Channel 292A, South Bend, Indiana. Partnership Radio holds a construction permit (BMPH-20160425ABS) to modify the WUBU operation and herein submits an application to cover the outstanding construction permit. A calculation of the transmitter power output of the WUBU transmitter is attached as Exhibit E.

There are eight (8) conditions attached to the construction permit. Condition #1 states:

*"The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines."*

Partnership Radio understands and pledges compliance with this condition.

Condition #2 states:

*"\*\*\*\*\* This is a Section 73.215 contour protection grant \*\*\*\*\*  
\*\*\*\*\* as requested by this applicant \*\*\*\*\*"*

Partnership Radio understands and agrees with this condition.

Condition #3 states:

*"BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee shall submit the results of a complete proof-of-performance to establish the horizontal plane radiation patterns for both the*

*horizontally and vertically polarized radiation components. This proof-of-performance may be accomplished using the complete full size antenna, or individual bays therefrom, mounted on a supporting structure of identical dimensions and configuration as the proposed structure, including all braces, ladders, conduits, coaxial lines, and other appurtenances; or using a carefully manufactured scale model of the entire antenna, or individual bays therefrom, mounted on an equally scaled model of the proposed supporting structure, including all appurtenances. Engineering exhibits should include a description of the antenna testing facilities and equipment employed, including appropriate photographs or sketches and a description of the testing procedures, including scale factor, measurements frequency, and equipment calibration."*

Partnership Radio acknowledges this condition and submits Exhibit A, which is a report from ERI demonstrating that WUBU was in compliance with this condition as presently licensed at 1.4 kilowatts.

Condition #4 states:

*"BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee must submit a certification executed by licensed surveyor showing that the FM directional antenna system has been oriented at the azimuth(s) specified in the directional antenna proof of performance. This certification must include a description of the method used by the surveyor to determine the azimuth(s) of the installed directional antenna system and the accuracy of that determination."*

Partnership Radio acknowledges this condition. Exhibit B is a letter from Thomas A. Stephenson (Stephenson Land Surveying) demonstrating compliance with this condition.

Condition #5 states:

*"BEFORE PROGRAM TESTS ARE AUTHORIZED, permittee/licensee shall submit an affidavit that the installation of the directional antenna system was overseen by a qualified engineer. This affidavit shall include a certification by the engineer that the antenna was installed pursuant to the manufacturer's instructions and list the qualifications for the certifying engineer."*

Partnership Radio acknowledges this condition. Exhibit C is a statement from Robert Henning stating his qualifications as a radio station engineer supervising the installation.

Condition #6 states:

*"BEFORE PROGRAM TESTS ARE AUTHORIZED, the permittee must submit an exhibit demonstrating that the measured directional antenna pattern complies with the appropriate community coverage provisions of 47 C.F.R. Sections 73.315 or 73.515 (See 47 C.F.R. Section 73.316(c)(2)(ix)(B))."*

Partnership Radio acknowledges this condition. Exhibit D1 is a coverage map demonstrating that South Bend is adequately served. Exhibit D2 is the tabulation of coverage. There is a graphic representation and tabulation of the measured WUBU directional pattern included in Exhibit A.

Condition #7 states:

*"The relative field strength of neither the measured horizontally nor vertically polarized radiation component shall exceed at any azimuth the value indicated on the composite radiation pattern authorized by this construction permit.*

*A relative field strength of 1.0 on the composite radiation pattern herein authorized corresponds to the following effective radiated power:*

*1.4 kilowatts.*

*Principal minima and their associated field strength limits:*

*120 degrees True:                      0.049 kilowatt"*

Partnership Radio acknowledges this condition. This data is included in Exhibit A.

Condition #8 states:

*"The AM station identified below may be affected by the facilities authorized by this construction permit. Pursuant to Section 1.30004 of the Commission's Rules, at least 30 days prior to commencement of construction of the facilities authorized herein, the permittee must provide notification of the construction to the AM station licensee. As part of this notification, the permittee must examine the potential impact of the construction of the authorized facilities on the AM station using a moment method analysis. The analysis shall consist of a model of the AM antenna together with the potential re-radiating tower in a lossless environment. The model shall employ the methodology specified in Section 73.151(c) of the Commission's Rules, except that the AM antenna elements may be modeled as a series of thin wires driven to produce the required radiation pattern, without any requirement for measurement of tower impedances. If the AM station was authorized pursuant to a directional proof of performance based on field strength measurements, the permittee may, in lieu of the moment method analysis, demonstrate with measurements taken before and after construction that field strength values at the monitoring points do not exceed the licensed values. If the construction results in radiation values in excess of the AM station's licensed standard pattern or augmented pattern values, the permittee is responsible for the installation and maintenance of any detuning apparatus necessary to restore proper operation of the directional antenna. (See Section 1.30002 of the Commission's Rules.) The permittee must submit confirmation of completion of these notice and analysis requirements in the application for license to cover this construction permit. If the facilities authorized by this Construction Permit do not result in a significant modification of the existing tower specified as defined in Section 1.30002(d) of the Commission's Rules, the permittee shall submit a certification and any necessary evidence supporting that certification in the Application for License.*

*Station WSBT, Facility ID No 73985, South Bend, IN."*

It is noted that no actual construction of towers was done to effect the completion of this project. Further, that the tower on which WUBU is located is not base insulated or detuned at the WSBT operating frequency. Since no physical changes to the tower, other than mounting of an antenna, was done, Partnership Radio submits that no actual impact on the operation of WSBT is noted. Further, there has been no noticeable impact on WSBT as verified by Mr. Henning, the station's engineer. A waiver of this condition is respectfully requested.

Based on the foregoing, it is believed that WUBU is in compliance with the Commission's rules and that all conditions have been met.