

October 09, 2006

Federal Communications Commission

Washington, DC



RE: W236AO – 146634 Port Saint Lucie, Florida

To Whom It May Concern;

On September 21, 2006, Reach Communications contracted Mr. Dawson of Hatfield & Dawson Consulting Engineers, LLC to analyze the two special conditions AM clauses on our FCC construction permit (BMPFT-20060828ABA). Below is a discussion between Mr. Dawson and Ms. Gallagher concerning this subject.

----- Original Message -----

Subject: RE: AM Proximity Condition BMPET-20060828ABA

Date: Tue, 26 Sep 2006 14:08:50 -0400

From: Ann Gallagher <[Ann.Gallagher@fcc.gov](mailto:Ann.Gallagher@fcc.gov)>

To: Ben Dawson <[dawson@hatdaw.com](mailto:dawson@hatdaw.com)>

OK with me. Just supply a statement containing the information below with the license application. You should also state that the tower is not detuned, if that's the case.

-----Original Message-----

From: Ben Dawson [<mailto:dawson@hatdaw.com>]

Sent: Friday, September 22, 2006 7:08 PM

To: Ann Gallagher

Subject: AM Proximity Condition BMPET-20060828ABA

Ann

FM Translator Construction Permit BMPET-20060828ABA has two AM proximity

conditions which appear to be unnecessary.

The CP authorizes construction of the translator antenna at the 130 meter level of a 157.8 meter overall height tower whose registration number is ARN1032455, file no. A0503419.

This tower is also employed as the antenna support structure for television station WTCE-TV, BLET-900510KE.

Condition 3 of the translator CP is a condition which assumes that the translator antenna is to be mounted on the same antenna tower as AM station WIRA. This condition was imposed because the coordinates shown in the Commission database for WIRA are identical to those for ARN1032455. However, these two towers cannot have the same coordinates,

and therefore this condition is not appropriate. As shown in the attached photograph, DSC-0199.jpg, tower ARN1032455 is in the foreground, while the actual WIRA antenna tower, in the background, behind the building, is about 500 feet east-southeast of ARN1032455. (Although the tower of WIRA has an electrical height of slightly more than 200 feet, and therefore with base insulator and base pier is undoubtedly more than 200 feet tall overall, the tower is not registered per the current FCC tower registration database.)

Condition 4 of the translator CP is a condition regarding the nearby (2.3 km) directional antenna system of station WJNX.

Because the translator construction consists of side-mounting an antenna on an existing grounded tower of very substantial mass and height, and because of the distances to the two AM stations, 150 meters with respect

to non-directional WIRA and 2300 meters to the directional array of WJNX, the proposed construction is trivial by comparison to the existing

mass and height of the tower. Therefore the translator permittee request waiver of these two conditions. Please advise me if there is any additional information that is necessary to accomplish this.

Thank you very much,

Ben

Benj. F. Dawson III, P.E.  
Hatfield & Dawson Consulting Engineers, LLC  
9500 Greenwood Avenue North  
Seattle, WA 98103 USA  
206 783 9151  
206 789 9834 Facsimile

Also, an inspection of the tower and the tower management show that it is grounded and not detuned. The following is a comment from Mr. Bert Brown of American Tower concerning the grounding of the tower.

The tower is grounded two ways six inch tv transmission line and tower lighting circuit...

Bert Brown  
561 379-4227

If you have any questions concerning this matter, please feel free to contact me at 954-556-4635, [ched@reachfm.org](mailto:ched@reachfm.org) or the address below.

Sincerely

Ched Keiler - CPBE  
Chief Engineer - Reach Communications  
Fort Lauderdale, Florida, USA  
954-556-4635