

JEFFREY G. DRESS
Proposed New AM Radio Station
Fargo, North Dakota
740 kHz 50 kW-D, 8.8 kW-CH, 0.94 kW-N, DA-3, U

ENGINEERING STATEMENT

This engineering statement, together with the attached figures, has been prepared on behalf of Jeffrey G. Dress, in support of an amendment to a pending application (file# BNP-20010703AAO, facility # 135847) for a new AM radio station to be licensed to Fargo, North Dakota.

This amendment replies to an FCC letter of Oct 2, 2002, concerning the above-referenced construction permit application, which raised several alleged engineering defects in the instant AM application. These matters our office has researched and will address individually.

DAYTIME INTERFERENCE

The letter of October 2 alleges that the proposal's 0.5 mv/m daytime groundwave contour would overlap the authorized 0.5 mv/m daytime groundwave contour of first-adjacent Canadian station CKDM, 730 kHz, Dauphin, Manitoba, in contravention of the U.S. - Canada Agreement.

The daytime pattern has been re-shaped to provide sufficient clearance of the proposed 0.5 mv/m contour to the licensed CKDM 0.5 mv/m contour based on Canadian groundwave propagation graphs. The portion of the CKDM 0.5 mv/m contour extending southward into US territory has been analyzed employing the domestic FCC groundwave graphs and shows no overlap of the 0.5 mv/m contours. Since it is standard practice to employ FCC skywave factors (verus Region 2) in analyzing received nighttime signals from Canada into the US, it is reasonable to apply FCC groundwave graphs in analyzing daytime signals from Canada into the US.

In conjunction with reshaping of the daytime (and critical hours) pattern, radial measurements have been made on co-channel station WMIN, Hudson, Wisconsin and are documented in the Appendix of this amendment.

This office continues to request a waiver of §73.182(q) of the rules regarding daytime received interference from the CKDM 0.25 mv/m contour. A review of the rules indicates the waiver is more properly directed to §73.37. It should be noted that the Commission has previously granted similar waivers for other of this office's clients when a newly proposed or modified domestic AM facility would receive interference from (but not contribute interference to) a Canadian facility providing the 1:1 first-adjacent interference standard was not exceeded. [See: BP-19970328AB, Koor Communications, Inc., Proposed New AM (WQTH), Hanover, NH; BP-19960205AA, Lloyd Lane, Inc., Radio Station WCJW, Warsaw, NY; and BP-19940207AD, also BMP-19981005AB, Radio Livingston, Ltd., Radio Station WYSL, Avon, NY.] Requested waivers for these stations were certainly in the public interest and would also be in the public interest for Mr. Dress's new facility at Fargo, ND. Accordingly, it is respectfully requested that Mr. Dress's application for a similar waiver be entertained.

NIGHTTIME INTERFERENCE

The letter of October 2 alleges "... the proposed 0.025 mv/m 10% skywave contour would overlap the 0.5 mv/m 50% skywave contour of a co-channel Canadian Class A station CBL, Toronto, Ontario, in violation of the US/Canadian Agreement."

The applicant and this office recognize the need to provide the cited nighttime interference protection to the notified facilities of CBL, now CHWO, Toronto, ON. According to Annex 2, Chapter 4, paragraph 4.10.2.2 of the US/Canada Agreement of 1984, the 0.5 mv/m 50% skywave contour and the 0.5 mv/m groundwave contour of CBL (CHWO) must be protected within Canadian territory; and where said contours are truncated at the US-Canada border, the CBL (CHWO) signal, skywave or groundwave, must be protected on a 20:1 ratio.

This office has revisited the detailed nighttime peripheral study (also referred to as a clipping study) performed on CBL and embodied in Figures 13, 14, 15A-C, 19 and 20 of the referenced application. Staff have recalculated CBL protection requirements, reviewed computer tabulations and maps.

Accordingly, the applicant, through this consulting firm, has amended Jeffrey Dress's referenced application to specify nighttime operating power of 0.94 kW versus 1 kW, but retained the identical shape of the nighttime standard pattern so that the CBL nighttime skywave and groundwave signals are appropriately protected in conformance with both the US/Canada Agreement and Commission policy. This small change of nighttime power will afford additional clearance of the required 20:1 ratio between the proposal and CBL (CHWO) and according to the proprietary skywave analysis program at this office indicates no ratio less than 20:1 anywhere within the Canadian portion of the CBL (CHWO) 0.5 mv/m 50% Region 2 skywave contour. It is pointed out that the contour is not required to be protected in US territory.

CANADIAN CONCURRENCE

It is respectfully requested that this amendment to the Jeffrey G. Dress application, along with the original application, be sent to Industry Canada for concurrence.

October 30, 2002

William J. Sitzman
Consulting Engineer