

ENGINEERING REPORT COVERING
REQUEST FOR MODIFICATION OF CONSTRUCTION PERMIT
ON BEHALF OF WAY BROADCASTING LICENSEE, L.L.C.
FOR STATION WATB (AM) 1430 KILOHERTZ
DECATUR, GEORGIA

MARCH 2013

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SUMMARY

The engineering exhibit of which this statement is part was prepared on behalf of Way Broadcasting Licensee, L.L.C., hereinafter referred to as “Way”, in support of an application for modification of construction permit BP-20120312ACL for AM station WATB Decatur, Georgia. Way is the licensee of WATB. WATB’s permit authorizes operation on 1430 kilohertz with power of 50 kilowatts daytime and 0.173 kilowatts nighttime employing a directional antenna system during the daytime hours. This application proposes minor changes in the WATB antenna system. Specifically, Way seeks to abandon the proposal to construct new towers at its presently licensed site and instead will utilize the existing tower array without any changes. The daytime directional operating parameters have been modified and requested power is 12 kilowatts. The only change to the nighttime nondirectional operation, aside from reverting to use of the existing tower array, is to a request a decrease in power to 0.158 kilowatts. No other changes are proposed.

DAYTIME ALLOCATION CONSIDERATIONS

The geographic area encompassed by the WATB daytime allocation study is vast and as a consequence, a conventional allocation map would be hard to read. Accordingly, several maps that provide greater allocation detail in critical areas are provided in lieu of a conventional map.

Figure 1 is a co-channel allocation map and Figure 2 is a first adjacent channel allocation map. Figure 3 is a second adjacent channel allocation map. The third adjacent channel mapping is provided on Figure 4.

Figure 5 is a polar plot of the proposed WATB daytime antenna pattern with tabulated horizontal plane radiation values. Figure 6 demonstrates the proposed facility will provide 5 mV/m service to 100% of WATB's city of license, Decatur, Georgia. No prohibited interference will be caused or received by the WATB daytime proposal.

NIGHTTIME ALLOCATION CONSIDERATIONS

To ensure that the protected RSS nighttime limits of any legally qualifying North American station will not be increased by this proposal, an allocation study was conducted for the proposed WATB nighttime operation. The study identified three stations that required further study. The stations, all co-channels, are KZQZ Saint Louis, Missouri, WXNT Indianapolis, Indiana and KTBZ Tulsa, Oklahoma. As demonstrated in the table displayed on the next page, the proposed power of 0.158 kilowatts will not increase radiation toward these stations at pertinent vertical angles. All fields are expressed in mV/m/km.

<u>STATION</u>	<u>CP FIELD</u>	<u>PROPOSED FIELD</u>
KZQZ	128.2	127.6
WXNT	127.6	126.9
KTBS	130.1	130.0

The proposed WATB nighttime facility will not increase the protected nighttime limits of any legally qualifying North American station.

FIELD STRENGTH MEASUREMENTS

All distance to contour calculations used in plotting the various allocation maps were based on M-3 soil conductivity data except where measured conductivities were utilized. Field strength measurement data on file provided in the underlying construction permit application BP-20040112AAX is incorporated in this application and is summarized below.

SUMMARY OF WATB MEASURED CONDUCTIVITY DATA

Bearing Cond. Dist. Cond. Dist. Cond. Dist. Cond. Dist.

24 1.5 14.64

65 1.0 18.5

90 1.0 13.6

230 1.5 4.38 1.0 8.85 0.5 39.4 0.1 50.2

250 0.5 1.75 1.0 5.0 0.5 25.0 0.1 76.99

270	0.5	1.88	1.0	8.48	0.1	75.41
310	1.0	24.62315	3.0	3.10	1.5	44.6 2.0 80.0
330	1.5	1.47	0.5	2.21	0.1	10.83 0.5 61.99*
345	1.0	78.2				

SUMMARY OF WDAL MEASURED CONDUCTIVITY DATA

Bearing Cond. Dist. Cond. Dist. Cond. Dist. Cond. Dist.

140	1.0	24.8	0.5	99.2
160	1.5	2.4	2.0	4.5 1.5 52.1 0.5 99.1

SUMMARY OF WGMI MEASURED CONDUCTIVITY DATA

Bearing Cond. Dist. Cond. Dist. Cond. Dist. Cond. Dist.

90	1.0	35.8
110	1.0	7.7 0.1 44.9

SUMMARY OF WFHK MEASURED CONDUCTIVITY DATA

Bearing Cond. Dist. Cond. Dist. Cond. Dist. Cond. Dist.

85	2.0	34.42	1.5	84.9
100	2.0	15.57	1.5	99.87
120	1.5	10.9	0.5	47.53

*This radial has been supplemented with new measurement data. See next page for details.

In addition, new measurement data was obtained for WATB and WDAL. The 330 degree WDAL radial was previously measured and additional measurements were obtained to extend the radial terminus from 61.99 kilometers to 81.04 kilometers. Several of the previous measurement locations on this radial were remeasured and were found to be in excellent agreement with the previous data. All other measured data is for new radials. Tables 1 - 9 provide measurement data tabulations and Figures 7 - 15 are graphs of the measurement analysis. Two reference graphs, which were used for the analysis, are provided as Figures 16 and 17. All measurements were performed by WATB Chief Engineer Orville Marshall using a Potomac Instruments model FIM-41 field strength meter, serial number 2141, last calibrated July 31, 2012. Mr. Marshall also took the measurements previously referenced in this report which were employed in the underlying construction permit application.

ANSI RADIATION GUIDELINES

A study of the proposed facility was conducted with respect to standards set forth in FCC Bulletin OST Number 65, Edition 97-01, regarding human exposure to radiofrequency radiation. In order to represent a worst case scenario, the study was based on the maximum power of 12 kilowatts radiating from a single tower. The study calculations were based on data provided in Supplement A, "Predicted Distances for Compliance with FCC Limits". Based on the data provided in Supplement A, the worst case scenario distance is 2.1 meters from the tower. The minimum existing fence distance of 3.9 meters from each tower will be compliant for the proposed operation.

When it is necessary for workers to be within the hazard area near the towers, an appropriate power reduction or temporary cessation of broadcasting will be implemented. The proposed operation will be fully compliant with the ANSI Radiation Guidelines as access to the transmitter site, including the towers, is prevented by a fence with a locked gate. Signs, warning of a RF hazard, are conspicuously posted at the site.

DECLARATION

The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Freehold, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

/s/

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