

APPLICATION FOR STATION LICENSE
CROSS COUNTRY COMMUNICATIONS, LLC
WLKW-FM RADIO STATION
CH 237A - 95.3 MHZ - 2.5 KW
CELORON, NEW YORK
November 2011

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Cross Country Communications, LLC ("Cross Country"), permittee of radio station WLKW-FM, Channel 237A, Celoron, New York. Cross Country has an outstanding permit to construct the WLKW-FM facilities (BNPH-20110630ADZ). Cross Country herein submits a license application to cover the outstanding WLKW-FM permit.

There are four operating condition/restriction on the WLKW-FM 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 radio frequency electromagnetic fields in excess of FCC guidelines."

Cross Country will comply with this condition.

Condition #2 states:

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

Cross Country recognizes this condition.

Condition #3 states:

"If the antenna is mounted on an existing tower that is not base-insulated or detuned at the AM frequency, the permittee shall submit a certification to this effect."

If the antenna is mounted on an existing tower that is base-insulated or detuned at the frequency of AM station WKSN(AM), Facility ID No. 65592, Jamestown, NY, the applicant shall notify the AM station. If necessary, the AM station may determine operating power by a method described in Section 73.51(a)(1) or (d). Permittee shall be responsible for readjustment and continued maintenance of any detuning apparatus necessary to prevent adverse effects upon the radiation pattern of the AM station. Both before and after the installation of the antenna and transmission line, AM antenna impedance measurements shall be made and sufficient field strength measurements, taken at a minimum of 8 locations along each of 6 equally spaced radials, shall be made to establish that the AM radiation pattern is essentially omnidirectional.

The results of the field strength measurements and the impedance measurements shall be submitted to the Commission in an application on FCC Form 302 notifying of the AM station's return to the direct method of power determination.

(See Section 73.45(c), FCC Rules)."

Cross Country notes that WKSN has ceased operation from its licensed location (BL-19841221AB), which is 0.5 kilometer from WLKW-FM and has removed its old tower and has/ will commence operation from its construction permit site (BP-20110504ACP), which is 1.5 kilometers from WLKW-FM. The provisions with reference to Broadcast station construction near or installation on an AM broadcast tower, §73.1692(c) states:

"Tower erections or modifications within 0.8 km of an AM nondirectional tower. Prior to commencing the construction of tower modifications, or the erection of a new tower, within 0.8 km of an AM nondirectional tower, the broadcast permittee or licensee is required to notify the AM station so that the AM station may commence determining operating power by the indirect method (see §73.51). The broadcast licensee or permittee shall be responsible for the installation and continued maintenance of detuning apparatus necessary to prevent adverse effects on the radiation pattern of the AM station. Both prior to construction of the tower modifications and upon completion of construction, antenna impedance measurements of the AM station shall be made. In addition, sufficient field strength measurements taken at a minimum of 10 locations along each of 8 equally spaced radials, shall be made to establish that the AM radiation pattern is essentially omnidirectional. Prior or simultaneously with the filing of the application for license to cover this permit, the results of the impedance measurements and the field strength measurements shall be filed with the Commission on FCC Form 302-AM for the AM station to return to the direct method of power determination."

The WKSN permit site is beyond the 0.8 kilometer distance. Cross Country, therefore, requests this condition be removed from their permit as not applicable.

Condition #4 states:

"Permittee has specified use of the antenna listed below to demonstrate compliance with the FCC radio frequency electromagnetic field exposure guidelines. If any other type or size of antenna is to be used with the facilities authorized herein, THE AUTOMATIC PROGRAM TEST

PROVISIONS OF 47 C.F.R. SECTION 73.1620 WILL NOT APPLY. In this case, a FORMAL REQUEST FOR PROGRAM TEST AUTHORITY must be filed in conjunction with FCC Form 302-FM, application for license, BEFORE program tests will be authorized. The request must include a revised RF field showing to demonstrate continued compliance with the FCC guidelines.

ERI "Rototiller" (EPA Type 3), four sections, 0.5 wavelength spaced".

Cross Country Communications is utilizing an ERI LPX-4E-HW antenna, which is an ERI "Rototiller" (EPA Type 3), four section, 0.5 wavelength spaced antenna, in compliance with this condition.

Based on the foregoing, it is believed that WLKW-FM has been constructed in compliance with the Commission's rules and that all conditions have been met.