

WSGC-FM REQUESTS

SAME CLASS NON-ADJACENT CHANNEL CHANGE FROM CHANNEL 287A TO CHANNEL 239A AND

A SITE SPECIFICATION FOR STATION WQZY ON 240C0

WSGC-FM Fully spaced reference point = N 33-59-22.0 W 82-46-22.0 (NAD 83- ASR # 1024116)

WSGC-FM proposes a non-adjacent, same class channel change to 239A. In order to achieve a fully spaced 239A reference point a site specification for WQZY on 240C0 is required. A 239A channel study and 70 dBu coverage map are attached as E1 and E2. No site map is provided since the reference point is at a registered tower.

As shown in the channel study at exhibit E1, the fully spaced reference point is short -spaced to Station WQZY(FM), Dublin, GA on 240C0.

The WSGC-FM 239A fully spaced reference point requires a modification of Station WQZY's reference point. For purposes of the reference point, WSGC-FM proposes a new fully spaced reference point for WQZY.

WQZY site specification = N 32-32-55.6 W 82-38-48.5 at an existing tower (ASR#1233238).

A channel study, 70 dBu coverage map and a topographic map of the reference point are provided as E3, E4 and E5.

The allotment of Channel 239A can be made consistent with the spacing requirements with the WQZY reference point change. In the Report and Order, *Revision of Procedures Governing Amendments to FM Table of Allotments and Changes to Community of License in the Radio Broadcast Services*, 21 FCC Rcd 14212 (2006) at para. 9, the Commission stated, "we will not count required reference coordinate changes (which are not set out in the Table of Allotments) against the current limit of four contingent

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minor change applications that may be filed simultaneously.” In that proceeding, the Commission eliminated the rule making process for these types of channel upgrades in class. In so doing the Commission permitted the previously required rule making changes (such as reference point changes) to be performed at the application stage.

The purpose of this reference point is to demonstrate that the allotment of Channel 239A can be made to Tignall, GA as if there were a two-step procedure. Since there is no longer a two-step procedure, the reference point will not be needed once the WSGC-FM 239A permit is granted. WQZY will continue to operating with its license facilities.

The location for the WQZY reference point is theoretically available for construction of a supporting tower and can provide 70 dBu coverage to Dublin, GA (see E4).

WSGC-FM-AP Allocation analysis:

The following exhibits are provided:

- E6 WSGC-FM-AP channel study
- E6A Interference plot and FMOVER to WQZY (GLOBE 30 second terrain)
- E7 WSGC-FM Longley-Rice 70 dBu
- E7A Longley-Rice data
- E8 ASR

Exhibits E1 demonstrates that the proposed facility meets Commission spacing requirements with the exception of station WQZY on 240C0 to which §73.215 is elected. An interference plot and an FMOVER study are provided as E6A. Exhibit E7 demonstrates that the proposed facility will encompass Tignall, GA with a Longley-Rice 70 dBu contour (73 dB including clutter loss - see below). The USGS 3 second terrain database and 3 dB of urban clutter loss were used for this analysis to replicate the OET methodology.

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ERP/ HAAT:

The facility will operate with 3 kW ERP non-directional at an HAAT of 91.4 meters.

Site = N 33-59-22.0 W 82-46-22.0

HAAT and Distance to Contours, FCC, FM 2-10 Miles, 51 points method - GLOBE 30 SEC

Azi.	AV EL	HAAT	ERP kW	70 dBu	60 dBu
------	-------	------	--------	--------	--------

000	155.4	86.6	3.0000	12.54	22.59
-----	-------	------	--------	-------	-------

030	153.6	88.4	3.0000	12.67	22.82
-----	-------	------	--------	-------	-------

060	143.0	99.0	3.0000	13.38	24.10
-----	-------	------	--------	-------	-------

090	123.5	118.5	3.0000	14.66	26.14
-----	-------	-------	--------	-------	-------

120	134.8	107.2	3.0000	13.93	25.03
-----	-------	-------	--------	-------	-------

150	155.6	86.4	3.0000	12.52	22.56
-----	-------	------	--------	-------	-------

180	158.8	83.2	3.0000	12.31	22.15
-----	-------	------	--------	-------	-------

210	154.5	87.5	3.0000	12.60	22.70
-----	-------	------	--------	-------	-------

240	155.7	86.3	3.0000	12.52	22.55
-----	-------	------	--------	-------	-------

270	143.7	98.3	3.0000	13.34	24.02
-----	-------	------	--------	-------	-------

300	154.1	87.9	3.0000	12.63	22.75
-----	-------	------	--------	-------	-------

330	174.0	68.0	3.0000	11.23	20.11
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Ave El= 150.57 M HAAT= 91.43 M AMSL= 242 M

Longley-Rice prediction used to establish 70 dBu coverage of Tignall, GA:

Exhibit E7 demonstrates that the proposed WSGC-FM 239A facility will place a 70 dBu contour over one hundred percent (100) of the Tignall, GA boundaries using the Longley-Rice “first occurrence” contour calculated using the V-Soft Probe 4 software and the USGS 3 second terrain database. This database is used only for the Longley-Rice calculation to replicate what we understand

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to be OET's standard methodology. Probe 4 is based on the NTIA Longley-Rice algorithm, and its use has been regularly accepted by the Commission in allocation proceedings in the past.

Use of Longley-Rice is permitted based on Commission policy and the *Hardinsburg, KY* ruling, 25 FCC Rcd 13204 (2010), which allows its use when the Longley-Rice predicted 70 dBu exceeds the FCC predicted 70 dBu by at least 10% on a radial through the community of license. Exhibit E7A includes a tabulation of the FCC and Longley-Rice 70 dBu contours through the range of azimuths of 160 to 175 degrees true that encompass the entire Tignall, GA boundary. The Longley-Rice 70 dBu exceeds the FCC 70 dBu by more than 10% (42.6%+) at all azimuths including the azimuth directly through the community. E7 shows that the Longley-Rice predicted contour does not exceed the FCC 60 dBu contour.

Antenna and RF calculation:

The WSGC-FM facility will utilize an ERI three bay LPX-3E full-wave spaced Rototiller, circularly polarized antenna at 108 meters AGL on ASR # 1024116. The RF contribution of the facility was calculated using the Commission's FMMODEL program to be $1.87 \mu\text{W}/\text{cm}^2$ or 0.94% of the maximum general public exposure (see below).

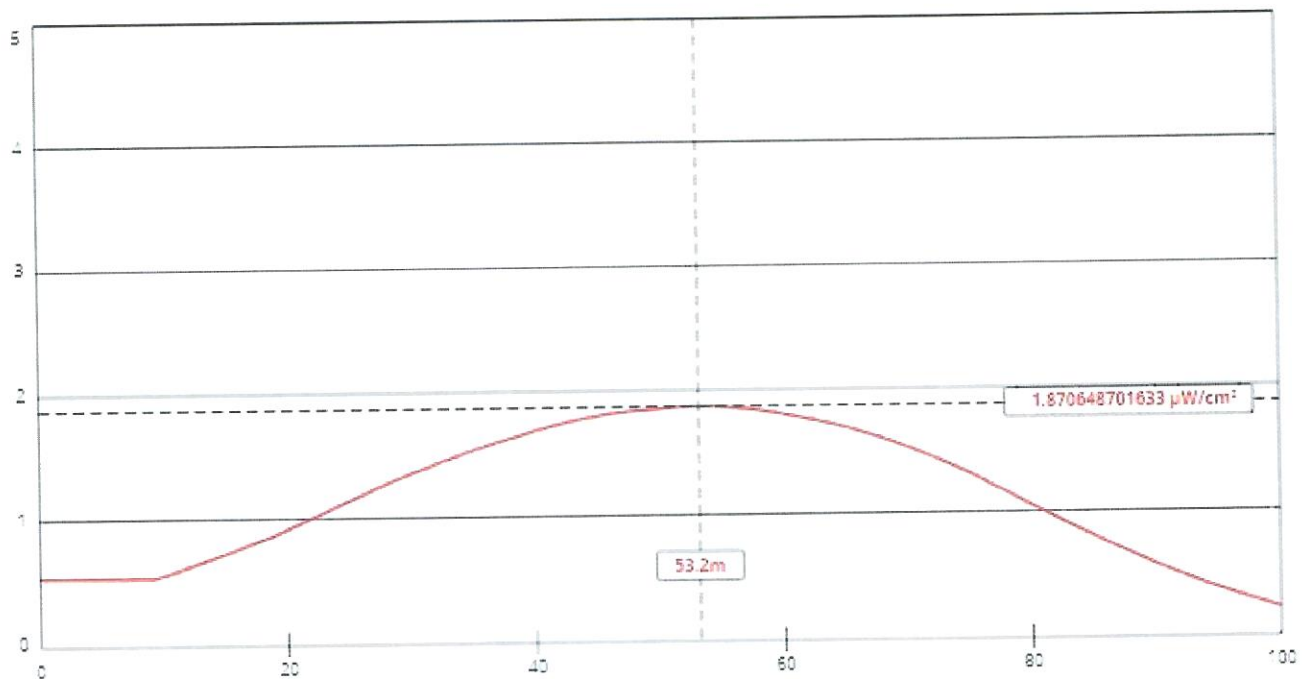


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FMMODEL OUTPUT:



[View Tabular Results +](#)

Channel Selection	Channel 239 (95.7 MHz) <input type="text"/>	
Antenna Type +	EPA Type 3: Opposed J Dipole <input type="text"/>	
Height (m)	<input type="text" value="100"/>	Distance (m) <input type="text" value="100"/>
ERP-H (W)	<input type="text" value="3000"/>	ERP-V (W) <input type="text" value="3000"/>
Num of Elements	<input type="text" value="3"/>	Element Spacing (λ) <input type="text" value="1"/>
Num of Points	<input type="text" value="500"/>	<input type="button" value="Apply"/>

E1 WSGC-FM REFERENCE POINT CHANNEL STUDY

ComStudy 2.2 search of channel 239 (95.7 MHz Class A) at 33-59-22.4 N, 82-46-22.0 W.

Date: July 5, 2020

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE	
WRBN	TOCCOA	GA 239 A	81.61	115.00	317.4	-33.4	#1
WQZY	DUBLIN	GA 240 C0	146.77	151.50	172.1	-4.7	#2
NEW	EDGEFIELD	SC 238 A	79.80	72.00	103.9	7.8	
WLTE	PENDLETON	SC 240 A	79.09	72.00	11.2	7.1	
WQZY	DUBLIN	GA 240 C0	160.20	151.5	175.8	8.7	#2
WXRC	HICKORY	NC 239 C0	225.73	215.00	43.3	10.7	
WSBB-FM	DORAVILLE	GA 238 C1	146.73	133.00	260.4	13.7	
WYPJ	DUE WEST	SC 237 A	59.92	31.00	35.5	28.9	
WKSP	AIKEN	SC 242 C2	85.31	55.00	113.2	30.3	
WGAC-FM	HARLEM	GA 236 C3	77.00	42.00	136.6	35.0	

Notes:

#1 WRBN Application (LMS 0000113473) is being dismissed

#2 WQZY reference point modified to N 32-32-55.6 W 82-38-48.5.

See channel study above and Technical Report narrative.

WSGC-FM-REF

239A REFERENCE POINT

Latitude: 33-59-22 N

Longitude: 082-46-22 W

Channel: 239

Frequency: 95.7 MHz

E2 REFERENCE POINT 70 DBU

WSGC-FM 239A
REFERENCE POINT
16.2 KM CIRCULAR 70 DBU

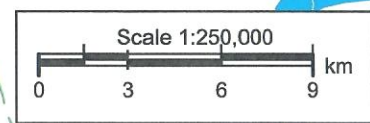
+ WSGC-FM-REF

Tignall, GA
2010 Boundaries



78

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Lincolnton
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E3 WQZY SITE SPECIFICATION CHANNEL STUDY

REFERENCE

32 32 55.60 N.

CLASS = C0

DISPLAY DATES

DATA 06-17-20

82 38 48.50 W.

Current Spacings to 3rd Adj.

SEARCH 06-17-20

----- Channel 240 - 95.9 MHz -----

Call	Channel	Location		Azi	Dist	FCC	Margin
WQZY	LIC 240C0	Dublin	GA	30.2	16.66	269.5	-252.8
WWPW	LIC 241C0	Atlanta	GA	312.1	210.71	206.5	4.2
WSGC-FM	RSV-A 239A	Tignall	GA	355.9	160.20	151.5	8.7 (1)
WMXZ	LIC-N 240C2	Isle Of Palms	SC	82.2	249.86	238.5	11.4
WLTE	LIC-Z 240A	Pendleton	SC	0.9	237.37	214.5	22.9
WJCL-FM	LIC 243C	Savannah	GA	113.6	134.69	104.5	30.2
WIHB-FM	LIC 243C3	Gray	GA	294.1	117.93	86.5	31.4
WQPW	LIC-N 239C2	Valdosta	GA	192.3	209.50	175.5	34.0

All separation margins include rounding.

(1) WSGC-FM 239A application fully spaced reference point = N 33-59-22.0 W 82-46-22.0.

WQZY-REF
SITE SPECIFICATION

Latitude: 32-32-55.60 N
Longitude: 082-38-48.50 W
Channel: 240
Frequency: 95.9 MHz

E4 WQZY
SITE SPECIFICATION
70 DBU CONTOUR

240C0 MAXIMUM CLASS
CIRCULAR 70 DBU = 59.1 KM

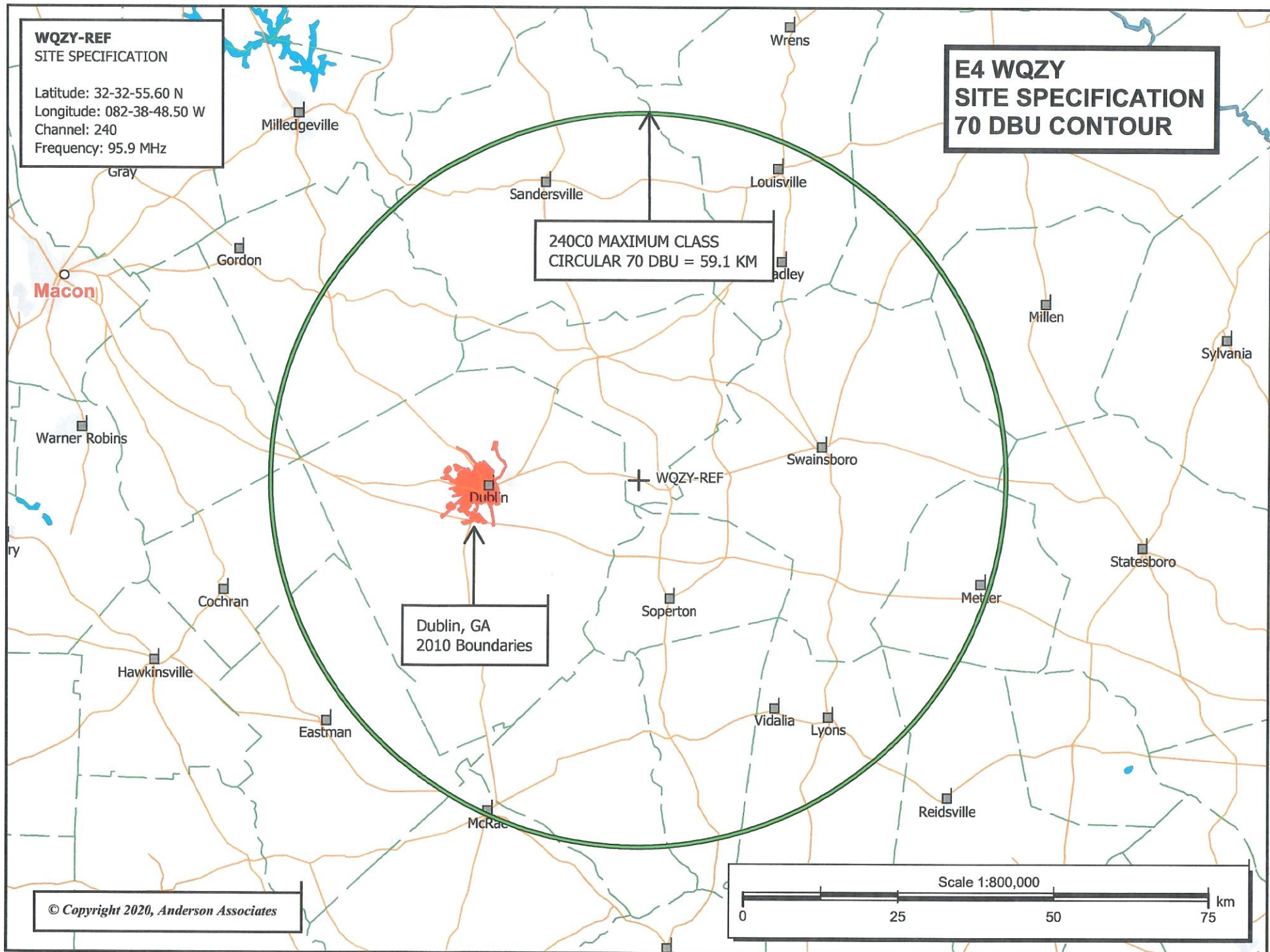
Dublin, GA
2010 Boundaries

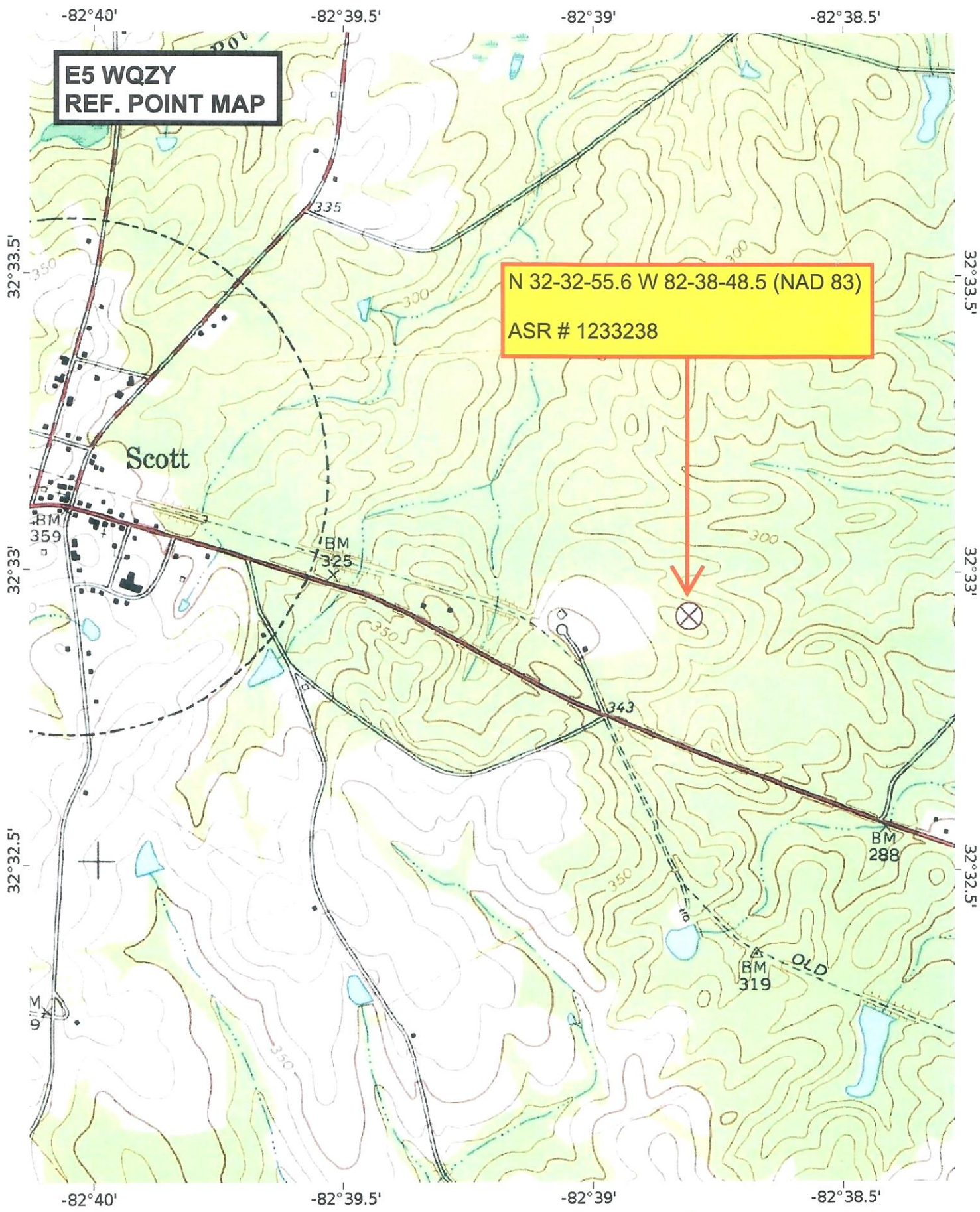
WQZY-REF

Scale 1:800,000

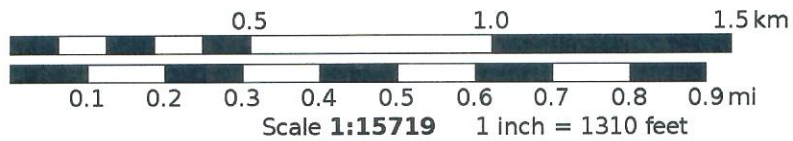
0 25 50 75 km

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Mercator Projection
WGS84
USNG Zone 17SLS
CalTopo



E6 WSGC-FM APPLICATION CHANNEL STUDY

ComStudy 2.2 search of channel 239 (95.7 MHz Class A) at 33-59-22.4 N, 82-46-22.0 W.

Date: July 5, 2020

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE	
WRBN	TOCCOA	GA 239 A	81.61	115.00	317.4	-33.4	#1
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WYPJ	DUE WEST	SC 237 A	59.92	31.00	35.5	28.9	
WKSP	AIKEN	SC 242 C2	85.31	55.00	113.2	30.3	
WGAC-FM	HARLEM	GA 236 C3	77.00	42.00	136.6	35.0	

Notes:

#1 WRBN Application (LMS 0000113473) is being dismissed

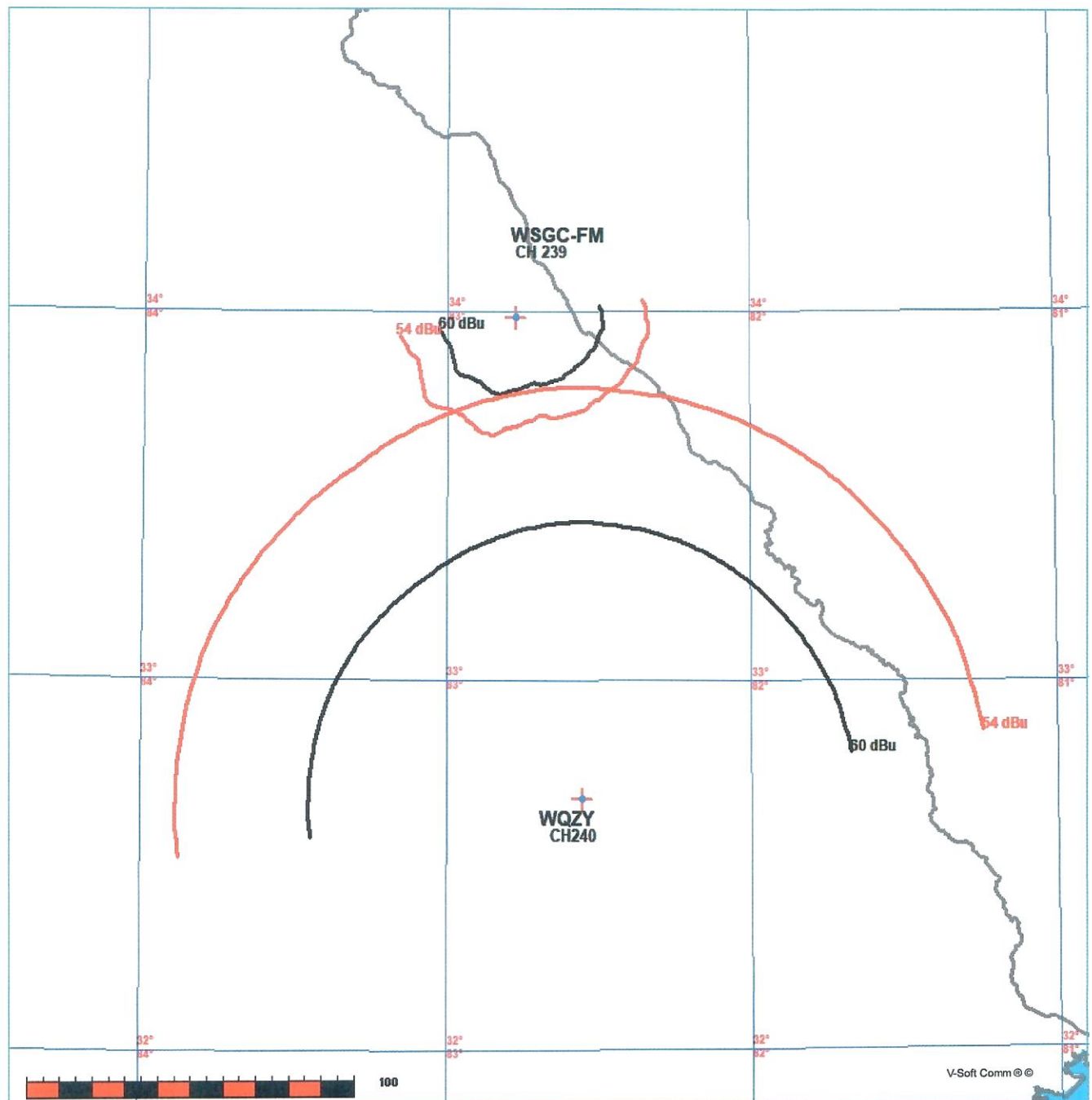
#2 73.215 elected to WQZY

E6A WSGC-FM-AP - WQZY MAX CLASS INTERFERENCE PLOT

FMCommander Single Allocation Study - 06-17-2020 - GLOBE 30 Sec
WSGC-FM's Overlaps (In= 0.47 km, Out= 31.41 km)

WSGC-FM CH 239 A 73.215 N
Lat= 33 59 22.00, Lng= 82 46 22.00
3.0 kW 91.4 m HAAT, 242 m COR
Prot.= 60 dBu, Intef.= 54 dBu

WQZY^ CH 240 C0 BLH20040405ACI
Lat= 32 40 42.60, Lng= 82 33 25.50
Max Cls: 100.0 kW 450 m HAAT, 542 m COR
Prot.= 60 dBu, Intef.= 54 dBu



E6A WSGC-FM - WQZY MAX CLASS FMOVER

Terrain Data: GLOBE 30 Sec

FMOVER Analysis

WSGC-FM

Channel = 239A
Max ERP = 3 kW
RCMSL = 242 m
N. Lat. 33 59 22.00
W. Lng. 82 46 22.00
Protected
60 dBu

WQZY BLH20040405ACI

(^ Max Class Parameters)
Channel = 240C0
Max ERP = 100 kW
RCMSL = 542 m
N. Lat. 32 40 42.60
W. Lng. 82 33 25.50
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
140.0	003.0000	0091.5	023.2	357.8	100.0000	0452.9	127.7	53.13	
141.0	003.0000	0092.6	023.3	357.7	100.0000	0452.9	127.4	53.22	
142.0	003.0000	0093.6	023.5	357.5	100.0000	0452.8	127.1	53.30	
143.0	003.0000	0093.6	023.5	357.4	100.0000	0452.8	126.8	53.36	
144.0	003.0000	0092.5	023.3	357.2	100.0000	0452.8	126.7	53.39	
145.0	003.0000	0091.2	023.2	357.0	100.0000	0452.7	126.6	53.41	
146.0	003.0000	0090.5	023.1	356.8	100.0000	0452.7	126.5	53.44	
147.0	003.0000	0090.0	023.0	356.7	100.0000	0452.6	126.3	53.48	
148.0	003.0000	0089.2	022.9	356.5	100.0000	0452.5	126.2	53.50	
149.0	003.0000	0088.0	022.8	356.3	100.0000	0452.5	126.2	53.51	
150.0	003.0000	0087.0	022.6	356.1	100.0000	0452.4	126.1	53.52	
151.0	003.0000	0086.5	022.6	355.9	100.0000	0452.4	126.0	53.55	
152.0	003.0000	0086.1	022.5	355.8	100.0000	0452.3	125.9	53.58	
153.0	003.0000	0085.6	022.5	355.6	100.0000	0452.2	125.8	53.60	
154.0	003.0000	0085.5	022.4	355.4	100.0000	0452.2	125.7	53.63	
155.0	003.0000	0085.3	022.4	355.2	100.0000	0452.1	125.6	53.66	
156.0	003.0000	0084.8	022.4	355.1	100.0000	0452.1	125.5	53.68	
157.0	003.0000	0083.8	022.2	354.9	100.0000	0452.0	125.5	53.68	
158.0	003.0000	0083.1	022.1	354.7	100.0000	0451.9	125.5	53.68	
159.0	003.0000	0082.6	022.1	354.5	100.0000	0451.8	125.4	53.69	
160.0	003.0000	0081.9	022.0	354.3	100.0000	0451.7	125.4	53.69	
161.0	003.0000	0080.4	021.8	354.1	100.0000	0451.6	125.5	53.66	
162.0	003.0000	0078.4	021.5	354.0	100.0000	0451.4	125.7	53.61	
163.0	003.0000	0076.3	021.2	353.8	100.0000	0451.3	125.9	53.55	
164.0	003.0000	0074.9	021.0	353.6	100.0000	0451.2	126.0	53.52	
165.0	003.0000	0074.2	020.9	353.4	100.0000	0451.0	126.1	53.50	
166.0	003.0000	0073.9	020.9	353.2	100.0000	0450.9	126.0	53.50	
167.0	003.0000	0074.3	021.0	353.1	100.0000	0450.8	126.0	53.52	
168.0	003.0000	0075.2	021.1	352.9	100.0000	0450.6	125.8	53.56	
169.0	003.0000	0076.6	021.3	352.8	100.0000	0450.5	125.6	53.61	
170.0	003.0000	0077.4	021.4	352.6	100.0000	0450.4	125.5	53.64	
171.0	003.0000	0077.7	021.4	352.4	100.0000	0450.3	125.4	53.65	
172.0	003.0000	0077.8	021.4	352.3	100.0000	0450.2	125.4	53.65	
173.0	003.0000	0078.2	021.5	352.1	100.0000	0450.0	125.3	53.66	
174.0	003.0000	0078.7	021.6	351.9	100.0000	0449.9	125.3	53.67	
175.0	003.0000	0079.4	021.7	351.7	100.0000	0449.8	125.2	53.68	
176.0	003.0000	0080.8	021.8	351.6	100.0000	0449.7	125.0	53.72	
177.0	003.0000	0081.8	022.0	351.4	100.0000	0449.6	125.0	53.74	
178.0	003.0000	0082.5	022.1	351.2	100.0000	0449.5	124.9	53.75	
179.0	003.0000	0083.1	022.1	351.0	100.0000	0449.4	124.9	53.76	
180.0	003.0000	0083.8	022.2	350.8	100.0000	0449.3	124.8	53.76	
181.0	003.0000	0084.5	022.3	350.7	100.0000	0449.2	124.8	53.76	
182.0	003.0000	0085.2	022.4	350.5	100.0000	0449.1	124.8	53.76	
183.0	003.0000	0085.8	022.5	350.3	100.0000	0449.0	124.8	53.76	
184.0	003.0000	0086.7	022.6	350.1	100.0000	0448.9	124.8	53.76	
185.0	003.0000	0087.5	022.7	349.9	100.0000	0448.9	124.8	53.76	
186.0	003.0000	0089.2	022.9	349.7	100.0000	0448.8	124.7	53.78	
187.0	003.0000	0091.3	023.2	349.5	100.0000	0448.7	124.6	53.81	
188.0	003.0000	0093.3	023.4	349.3	100.0000	0448.6	124.5	53.84	
189.0	003.0000	0095.5	023.7	349.1	100.0000	0448.5	124.3	53.86	
190.0	003.0000	0097.5	023.9	348.8	100.0000	0448.4	124.3	53.88	
191.0	003.0000	0099.1	024.1	348.6	100.0000	0448.3	124.3	53.88	
192.0	003.0000	0099.7	024.2	348.4	100.0000	0448.2	124.4	53.85	
193.0	003.0000	0099.2	024.1	348.3	100.0000	0448.1	124.6	53.79	
194.0	003.0000	0098.7	024.1	348.1	100.0000	0448.0	124.8	53.73	
195.0	003.0000	0098.8	024.1	347.9	100.0000	0447.9	125.0	53.68	

E6A WSGC-FM - WQZY FMOVER

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)	-
196.0	003.0000	0099.2	024.1	347.8	100.0000	0447.8	125.2	53.64		
197.0	003.0000	0099.4	024.1	347.6	100.0000	0447.7	125.3	53.59		
198.0	003.0000	0098.8	024.1	347.4	100.0000	0447.7	125.6	53.52		
199.0	003.0000	0097.8	024.0	347.3	100.0000	0447.6	125.9	53.44		
200.0	003.0000	0096.6	023.8	347.2	100.0000	0447.5	126.3	53.35		
201.0	003.0000	0095.2	023.7	347.1	100.0000	0447.5	126.6	53.25		
202.0	003.0000	0093.9	023.5	347.0	100.0000	0447.4	127.0	53.16		
203.0	003.0000	0093.1	023.4	346.8	100.0000	0447.4	127.3	53.08		
204.0	003.0000	0092.6	023.3	346.7	100.0000	0447.3	127.6	53.00		
205.0	003.0000	0091.9	023.3	346.6	100.0000	0447.3	127.9	52.92		

WSGC-FM-AP

Latitude: 33-59-22 N
Longitude: 082-46-22 W
ERP: 3.00 kW
Channel: 239
Frequency: 95.7 MHz
AMSL Height: 242.0 m
Elevation: 134.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: Longley-Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

USGS 3 SECOND TERRAIN
1 KM CELLS

E7 TIGNALL 70 DBU COVERAGE

WSGC-FM-AP FCC 60 dBu (50:50)

WSGC-FM-AP
FCC 70 dBu (50:50)

WSGC-FM-AP

Longley-Rice
First Occurrence 73 dBu

Tignall, GA
2010 Boundaries

> 73.0 dBuV/m

Scale 1:250,000

0 3 6 9 km

E7A LONGLEY-RICE 73 DBU TABULATION

Using the first occurrence method at 73.0 dBu.

Transmitter Information:

Call Letters: WSGC-FM-AP
Latitude: 33-59-22 N
Longitude: 082-46-22 W
ERP: 3.00 kW
Channel: 239
Frequency: 95.7 MHz
AMSL Height: 242.0 m
Elevation: 134.0 m
HAAT: 91.4 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Azimuth(deg)	FCC 70 dBu(km)	LR 73 dBu(km)	+	%	HAAT (m)
160.0	12.62	18.00	42.6		87.8
161.0	12.52	18.00	43.8		86.2
162.0	12.38	17.90	44.6		84.2
163.0	12.17	17.90	47.1		81.3
164.0	11.95	17.90	49.8		78.1
165.0	11.79	18.20	54.4		75.8
166.0	11.76	17.70	50.5		75.4
167.0	11.81	17.60	49.0		76.1
168.0	11.90	17.50	47.1		77.3
169.0	12.00	17.50	45.8		78.8
170.0	12.11	17.70	46.2		80.3
171.0	12.18	18.90	55.2		81.4
172.0	12.27	18.50	50.8		82.7
173.0	12.33	18.70	51.7		83.6
174.0	12.40	18.70	50.8		84.5
175.0	12.44	18.80	51.1		85.0

Note: These calculations were performed using the V-Soft Probe 4 program which utilizes the NTIA code. The USGS 3 second terrain database, 1 km cells and 3 dB of urban clutter loss were used to replicate our understanding of the current OET methodology.

E8 Registration 1024116



Registration Detail

Reg Number	1024116	Status	Constructed
File Number	A0921382	Constructed	04/27/1998
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	33-59-22.0 N 082-46-22.0 W	Address	1.9 KM N OF BROAD RIVER
City, State	ELBERTON , GA		
Zip	30635	County	ELBERT
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
134.0	113.7
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
247.7	113.0

Painting and Lighting Specifications

FAA Chapters 3, 4, 5, 13
Paint and Light in Accordance with FAA Circular Number 70/7460-1J

FAA Notification

FAA Study	96-ASO-5732-OE	FAA Issue Date	01/13/1997
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Owner & Contact Information

FRN	0003772498	Owner Entity Type	Limited Liability Company
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Owner

Georgia-Carolina Radiocasting Company, LLC Attention To: Douglas M Sutton Jr 233 Big A Road P.O. Box E Toccoa , GA 30577	P: (706)297-7264 F: E: sutton@gacaradio.com
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Contact

Attention To: Art Sutton 233 Big A Road P.O. Box E Toccoa , GA 30577	P: (706)297-7264 F: (706)297-7266 E: sutton@gacaradio.com
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Last Action Status

Status	Constructed	Received	09/04/2014
Purpose	Admin Update	Entered	09/04/2014
Mode	Interactive		