

## **Compliance with Special Operating Conditions**

The W204CT Construction Permit (File Number 0000180053) contains Three Special Operating Conditions:

1. *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 radiofrequency electromagnetic fields in excess of FCC guidelines.*
2. *Prior to commencing program test operations, FM Translator or FM Booster permittee must have on file at the Commission, FCC Form 350, Application for an FM Translator or FM Booster Station License, pursuant to 47 C.F.R. Section 74.14.*
3. *The AM station identified below may be affected by the facilities authorized by this construction permit. Pursuant to Section 1.30004 of the Commission's Rules, at least 30 days prior to commencement of construction of the facilities authorized herein, the permittee must provide notification of the construction to the AM station licensee. A part of this notification, the permittee must examine the potential impact of the construction of the authorized facilities on the AM station using a moment method analysis. The analysis shall consist of the model of the AM antenna together with the potential re-radiating tower in a lossless environment. The model shall employ the methodology specified in Section 73.151(c) of the Commission's Rules, except that the AM antenna element may be modeled as a series of thin wires driven to produce the required radiation pattern, without any requirement for measurement of tower impedances. If the construction distorts the AM station non-directional pattern by more than 2db, the permittee is responsible for the installation and maintenance of any detuning apparatus necessary to restore proper operation of the non-directional antenna. (See Section 1.30002 of the Commission's Rules.) The permittee must submit confirmation of completion of these notice and analysis requirements in the application for license to cover this construction permit. If the facilities authorized by this Construction Permit do not result in a significant modification of the existing tower specified as defined in Section 1.30002(d) of the Commission's Rules, the permittee shall submit a certification and any necessary evidence supporting that certification in the Application for License. Station WAOB(AM), Millvale, PA, Facility ID No. 60155.*

Educational Media Foundation ("EMF") complies with, or agrees to, the condition as follows:

1. EMF in coordination with other users of the site agrees to reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna, from radiofrequency electromagnetic fields in excess of FCC guidelines.
2. Form 350 is being filed prior to commencing program test operations.
3. As stated in the Special Operating Procedure: *If the facilities authorized by this Construction Permit do not result in a significant modification of the existing tower specified as defined in Section 1.30002(d) of the Commission's Rules, the permittee shall submit a certification and any necessary evidence supporting that certification in the Application for License.*

1.30002(d) A significant modification of a tower in the immediate vicinity of an AM station is defined as follows:

- (1) Any change that would alter the tower's physical height by 5 electrical degrees or more at the AM frequency; or
- (2) The addition or replacement of one or more antennas or transmission lines on a tower that has been detuned or base-insulated.

EMF confirms that no change in the tower structure height has occurred as a result of this K204CT transmit antenna change. EMF also confirms the tower structure is not detuned or base-insulated. The tower is in fact a grounded tower. Since no physical change to the height of the tower has occurred and the tower is a grounded structure, no significant changes have taken place in regard to station WAOB(AM), Millvale, PA, Fac. ID No. 60155.