

**Statement A**

*Attachment to FCC License to Cover for WZBZ(FM)*  
**APPLICATION FOR STATION LICENSE**

**Covering FCC Construction Permit 0000213525**

**WZBZ(FM) Pleasantville, NJ - Facility ID 1306**  
**Equity Communications, L.P.**

Prepared by  
Robert J. Clinton  
**CAVELL, MERTZ & ASSOCIATES, INC.**  
JUNE 16, 2023

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**APPLICATION FOR STATION LICENSE**  
**Supporting FCC Construction Permit 0000213525**  
**WZBZ(FM) Pleasantville, NJ (Facility ID 1306)**

**Introduction and Summary**

This Statement has been prepared on behalf of *Equity Communications, L.P.*, (“Equity”), licensee of Station WZBZ(FM), Pleasantville, New Jersey. *Equity* holds a Construction Permit, FCC File Number 0000213525, authorizing a minor modification to move to a new registered supporting structure (ASR 1042954). The construction authorized in the Construction Permit (“CP”) has been completed. Installation and adjustment of the antenna and transmission systems necessary to operate with the authorized new facilities into the site’s FM antenna system have been accomplished. As such, this facility is now able to operate in compliance with the terms and conditions of its CP and all applicable FCC Rules and policies. *Program Test Authority* (“PTA”) is herein assumed as of the submission of the instant application as discussed below.

**Satisfaction of CP Conditions**

The WZBZ(FM) Construction Permit is subject to four **Special Operating Conditions**, which are discussed in the following paragraphs. *All Conditions have been complied with as of the filing of this Application.* Specifically:

**FCC Special Operating Condition 1** requires that:

*“BEFORE PROGRAM TESTS COMMENCE, sufficient measurements shall be made to establish that the operation authorized in this construction permit is in compliance with the spurious emissions requirements of 47 C.F.R. Sections 73.317(b) through 73.317(d). All measurements must be made with all stations simultaneously utilizing the shared antenna. These measurements shall be submitted to the Commission along with the FCC Form 302-FM application for license.”*

*Equity* has commissioned spurious emissions measurements to demonstrate compliance with the FCC’s rules. Attached herewith as **Attachment I** is a “*Report of Intermodulation Product Findings*” provided by Bryan Shaw, a local engineer who oversaw the construction for *Equity*. This common

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antenna system also is specified for use by WTTH(FM). As demonstrated in the report, there are no inter-modulation products in excess of 80 dB below the carrier levels in the installed system.

**FCC Special Operating Condition 2** states that:

*“\*\*\*\*\* This is a Section 73.215 contour protection grant as requested by this applicant  
\*\*\*\*\*”*

The WZBZ(FM) authorization was inadvertently classified as a section 73.215 facility when it is in fact NOT short spaced to any nearby adjacent facility, and therefore is not required to protect nearby facilities using section 73.215 guidelines. WZBZ(FM) is a grandfathered section 73.213 3 kW Class A facility, and does comply with the spacing requirements outlined in Section 73.213(c)(1) of the Rules. *Equity* therefore requests that the 73.215 designation be removed from the authorization. By constructing and operating the facility in accordance with the authorization, all normal protection requirements to other authorizations have been met.

**FCC Special Operating Condition 3** requires that:

*“Permittee has specified use of the antenna listed below to demonstrate compliance with the FCC radiofrequency 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. Shively 6842-5P-SS-EF (EPA Type 2: Opposed V dipole), five sectioned antenna.”*

*Equity* certifies that the installed antenna is the same make and model specified in the Construction Permit (a Shively 6842-5P-SS-EF five sectioned antenna). Thus, the RF field showing does not need to be revised, and Automatic Program Test Authority may be assumed.

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**FCC Special Operating Condition 4** requires that:

*“Upon commencement of program tests in accordance with Section 73.1620, the licensee must cease use and request cancellation of the auxiliary facility authorized by BMLH-19950320KA due to a violation of Section 73.1675(a)(1). Alternatively, the licensee may seek modification of the auxiliary facility in accordance with Section 73.1675(c)(1) to bring it into compliance with Section 73.1675(a)(1). Documentation of compliance with this condition must be submitted with the FCC Schedule 302, Application for License.”*

*Equity* has ceased use of the referenced Auxiliary facility, and is requesting cancellation of the license (BMLH-19950320KA) as documented separately in this application.

Thus, it is believed that the equipment has been installed in compliance with FCC Rules, and with the showings above, *Equity* is in compliance with all Special Conditions set forth in the Construction Permit.

**Certification**

These application materials have been prepared on behalf of ***Equity Communications, L.P.*** by the undersigned or under his direction and are true and correct to the best of his information, knowledge and belief. Mr. Clinton’s qualifications are a matter of record before the FCC.

Respectfully submitted,



Robert J. Clinton    June 16, 2023  
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**Attachment I**

**Spurious Emissions / Intermodulation Products Report**

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**WZBZ(FM) Pleasantville, New Jersey (Facility ID 1306)**

B Plus Communications, LLC  
525 S. Washington Street Easton MD 21601

Introduction: This report of findings is based on data collected at the FM broadcast facility located in Atlantic City, NJ. The report includes measurements offered as proof that the combined operations of the WTTH (96.1 MHz.) and WZBZ (99.3 MHz.) transmitters are in compliance with the FCC Rules and Regulations as required by the Code of Federal Regulations (CFR) Title 47 section 73.317 paragraph (b) through (d). In brief, the measurements presented in this report shows that the third order inter-modulation (IM) products generated by this diplexed system are less than the maximum allowable level as required by section 73.317 (b) through (d).

Bryan Shaw of B Plus Communications, LLC located in Easton, Maryland performed the measurements summarized herein on March 28, 2023. Remote technical assistance was provided by Robert J. Clinton of Cavell Mertz & Associates Inc. All of the measurements referenced below were made from the combiner system output directional coupler sample port. These measurements were made using an Agilent E4402B spectrum analyzer with 30dB of external attenuation and 5 dB of internal attenuation.

The diplexed stations WTTH at 96.1 MHz and WZBZ at at 99.3 MHz can potentially generate 3<sup>rd</sup> order intermodulation products at 92.9 and 102.5 MHz as shown in the list below. Three additional frequencies are also listed whose signals were detected in the RF spectrum measurements but which are generated by licensed FM stations whose broadcast antennas are located in close proximity to the diplexed system that is the subject of this report.

Station 1	WTTH	96.1	Measured at -35.63 dB
Station 2	WZBZ	99.3	Measured at -35.08 dB
IMP 1.2 (2x96.1-99.3)		92.9	Measured at -116.6 dB
IMP 2.1 (2x99.3-96.1)		102.5	Measured at -118.0 dB
Station 3	WAYV	95.1	
Station 4	WFPG	96.9	
Station 5	WPUR	107.3	

The table below summarizes the results. It shows the measured value for each station, the measured value for each 3<sup>rd</sup> order intermodulation product, and the delta value between the two.

Station	Measurement	IMP	Measurement	Delta
WTTH	-35.63 dB	1.2	-116.6 dB	-80.97 dB
WTTH	-35.63 dB	2.1	-118.0 dB	-82.37 dB
WZBZ	-35.08 dB	1.2	-116.6 dB	-81.52 dB
WZBZ	-35.08 dB	2.1	-118.0 dB	-82.92 dB

Conclusion: Based upon my observations and measurements taken on March 28, 2020 and presented in this document, I, Bryan Shaw, find the transmitters and combiner system for the diplexed operation of WTTH and WZBZ to be in proper working order. Furthermore, the measured data reveals no inter-

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525 S. Washington Street Easton MD 21601

modulation products in excess of 80 dB below carrier levels generated from or within the stations operating on the installed system. Based on this recorded data, I conclude that WTTH and WZBZ are in compliance with the requirements of Section 73.317 paragraph (b) through (d) of the FCC Rules and Regulations.

Statement: The author of this report is a broadcast engineer with more than 20 years of experience in FM and AM radio. He began working as a broadcast engineer at Great Scott Broadcasting from 1999 until until the company sold its stations in 2014. There he worked for and trained under the Director of Engineering Terry J. Dalton, who is now the owner-operator of Stellar Communication Systems, LLC and has authored multiple reports submitted to the FCC. The author of this report served as Chief Engineer for MTS Broadcasting from 2009 until the company sold its stations in 2018. He has worked as a contract engineer for multiple broadcasting companies since 2009 and since 2019 has been the owner-operator of B Plus Communications, LLC.