

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE:

**DANIEL F. PRIESTLEY
VEAZIE, MAINE**

0.81/1.0 KW-ND-U 1400 KHZ

SEPTEMBER 5, 2001

ENGINEERING STATEMENT IN SUPPORT OF
AN AMENDMENT TO
REDUCE NIGHTTIME POWER
OF A PENDING APPLICATION FOR A
NEW CLASS C (IV) AM FACILITY

File No. BNP-20000128AAY - Facility ID: 122379

File No. BNP-20001016AAF - Facility ID: 128805

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NARRATIVE STATEMENT:

I. General:

This engineering statement has been prepared on behalf of Daniel F. Priestley, an applicant for a new Class C (IV) AM facility on 1400 kHz at Veazie, Maine. This amendment reduces the proposed nighttime power from 0.86 kW to 0.81 kW in order to provide protection to a Canadian AM station. This nighttime protection problem surfaced after discussions with the staff.

In the past, previously licensed but now “dark” domestic AM stations were kept in the data base as notified stations to provide some degree of limitation on foreign AM stations wishing to use the now vacated frequency. Current FCC policy no longer favors this approach since inclusion of “dark” stations, in some cases, permits foreign stations to radiate more signal at nighttime towards domestic U.S. stations. As originally filed, this application included all “dark” stations contained in the FCC’s CDBS data base system.

II. Engineering Discussion:

A. Class C (IV) Nighttime Allocation Criteria:

Section 73.182(a)(3) of the FCC Rules states: “On local channels the separations required for daytime protection shall also determine the nighttime separation”. Hence, typically no separate nighttime allocation study is required. However, as in this case, when the proposed station is located sufficiently close to a U.S. border an analysis of co-channel foreign stations is required. The site proposed herein is less than 110 km from the border. Under international agreement, only co-channel contributors are included and a 50% RSS Exclusion is used. In accordance with Staff directions “dark” domestic stations are being excluded.

At 1 kW the facility proposed by Priestley was found to enter into the 50% RSS limits of the following Canadian stations:

	Half of 50% RSS	Lowest Contribution	1 kW Contribution	Maximum Permitted kW
CJFP/1400	7.830	7.383	8.186	0.813
CKFL/1400	9.307	8.919	9.247	0.930

Based upon this information, the nighttime power proposed herein has been reduced to **0.81 kW**. The nighttime interference-free 50% RSS of the AM facility proposed herein is **23.5 mV/m**.

Figure 8 (already on file) used a limit of 24.4 mV/m to demonstrate nighttime city grade coverage. Since the amended limit of 23.5 mV/m goes a greater distance there is no doubt that city grade coverage will be provided.

III. SUMMARY:

Daniel F. Priestley requests a Construction Permit for a new Class C (IV) AM facility on 1400 kHz at Veazie, Maine. This engineering proposal as **amended** is in full compliance with the Commission's Technical & Duopoly Rules.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

September 5, 2001.