

FOR
FCC
USE
ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY

FILE NO.

Section I - General Information

1	Legal Name of the Applicant Kirkman Broadcasting, Inc.		
	Mailing Address 60 Markfield Drive, Unit 4		
	City Charleston	State or Country (if foreign address) SC	ZIP Code 29407
	Telephone Number (include area code) 843/763-6631	E-Mail Address (if available) gil@kirkmanbroadcasting.com	
	FCC Registration Number 0005079421	Call Sign WQSC	Facility ID Number 34590
2.	Contact Representative (if other than applicant) Nancy A. Ory		Firm or Company Name Lerman Senter PLLC
	Mailing Address 2001 L Street, NW, Suite 400		
	City Washington	State or Country (if foreign address) DC	ZIP Code 20036
	Telephone Number (include area code) 202/416-6791	E-Mail Address (if available) nory@lermansenter.com	

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

☐ Governmental Entity ☐ Other _____

4. Application Purpose.

- | | |
|--|--|
| <input type="checkbox"/> New Station | <input type="checkbox"/> Major Modification of construction permit |
| <input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments | <input type="checkbox"/> Minor Modification of construction permit |
| <input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments using Tribal Priority | <input type="checkbox"/> Major Amendment to pending application |
| | <input type="checkbox"/> Minor Amendment to pending application |
| <input type="checkbox"/> Major Change in licensed facility | |
| <input checked="" type="checkbox"/> Minor Change in licensed facility | |

a. File number of original construction permit: BZ-19960311AB ☐ N/A

b. Service Type: ☒ AM ☐ FM ☐ TV ☐ DTV ☐ DTS

c. DTV Type: ☐ Pre-Transition ☐ Post-Transition ☐ Both

d. Community of License:

City Charleston	State SC
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e. Facility Type: ☒ Main ☐ Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No. N/A

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☒ Yes ☐ No

2. **Parties to the Application.**

a. List the applicant, and, if other than a natural person, its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.

(2) Citizenship.

(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's **equity/debt plus** standard, etc.

(4) Percentage of votes.

(5) Percentage of total assets (equity plus debt).

(1)	(2)	(3)	(4)	(5)
N/A				

b. Applicant certifies that equity and financial interests not set forth above are non-attributable.

☐ Yes ☐ No

See Explanation in Exhibit No.

☒ N/A

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.

☒ N/A

4. **Multiple Ownership.**

a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?

☐ Yes ☒ No

If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.

Exhibit No.
N/A

Section II - Legal

- b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules.

☒ Yes ☐ No

Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. Section 73.3555(a).

See Explanation
in Exhibit No.
A

All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. Section 73.3555.

- c. Applicant certifies that the proposed facility:

☒ Yes ☐ No

- (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;
- (2) complies with the Commission's policies relating to future ownership interests; and
- (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

See Explanation
in Exhibit No.

- d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. Section 121.201), and holds:

☐ Yes ☒ No

- (1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or
- (2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or
- (3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?

See Explanation
in Exhibit No.

All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.

5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application

☒ Yes ☐ No

- a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
- b. any pending broadcast application in which character issues have been raised.

See Explanation
in Exhibit No.

6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

☒ Yes ☐ No

See Explanation
in Exhibit No.

7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

☒ Yes ☐ No

See Explanation
in Exhibit No.

8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

☒ Yes ☐ No

9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.

☒ Yes ☐ No

10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.

☐ Yes ☐ No ☒ N/A

Exhibit No.

An exhibit is required unless this question is inapplicable.

11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

☒ Yes ☐ No

12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

☐ Yes ☐ No ☒ N/A

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

☐ Yes ☐ No ☒ N/A

14. **Tribal Priority - Threshold Qualifications.** Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.

☐ Yes ☒ No

Exhibit No.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing Guilford M. Kirkman	Typed or Printed Title of Person Signing President
Signature /s/	Date 5/10/2023

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Louis R. duTreil Jr.	Relationship to Applicant (e.g., Consulting Engineer) Technical Consultant	
Signature /s/	Date 5/4/23	
Mailing Address duTreil Lundin & Rackley Inc, 5212 Station Way		
City Sarasota	State or Country (if foreign address) FL	ZIP Code 34233
Telephone Number (include area code) 941-329-6004	E-Mail Address (if available) bobjr@DLR.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III - A AM Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Frequency: 1340 kHz
2. Class: ☐ A ☐ B ☒ C ☐ D
3. Hours of Operation: ☒ Unlimited ☐ Limited ☐ Daytime ☐ Share Time ☐ Specified Hours: _____
4. Daytime Operation: ☒ Yes ☐ No
- a. Power: 0.6 kW
- b. Antenna Location Coordinates: (NAD 27)
- 32 ° 52 ' 20 " ☒ N ☐ S Latitude
- 79 ° 58 ' 36 " ☐ E ☒ W Longitude
- c. Nondirectional: ☒ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 304.56 mV/m per kW at 1 km

Tower	1
Overall height above ground (include obstruction lighting) (meters)	55.8
Antenna structure registration	<div>Number</div> <div><input type="checkbox"/> Notification filed with FAA</div> <div><input checked="" type="checkbox"/> Not applicable</div>
Height of radiator above base insulator, or above base, if grounded (meters)	54.9
Electrical height of radiator (degrees)	88.3
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - DAYTIME OPERATION

d. Directional:

☐ Yes ☒ No

Exhibit No.

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Theoretical _____ mV/m at 1 km

Standard RMS: _____ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <div>Not applicable</div> <input type="checkbox"/>	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <div>Not applicable</div> <input type="checkbox"/>	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <div>Not applicable</div> <input type="checkbox"/>	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <div>Not applicable</div> <input type="checkbox"/>
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☒ No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth

Span

Augmentation radiation
(mV/m at 1 km)

TECH BOX - NIGHTTIME OPERATION

5. Nighttime Operation:

☒ Yes ☐ No

a. Power: 0.6 kW

b. Antenna Location Coordinates: (NAD 27)

32 ° 52 ' 20 " ☒ N ☐ S Latitude
79 ° 58 ' 36 " ☐ E ☒ W Longitude

c. Nondirectional:

☒ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 304.56 mV/m per kW at 1 km

Tower	1
Overall height above ground (include obstruction lighting) (meters)	55.8
Antenna structure registration	<div style="text-align: center;"> <u> </u> Number <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not applicable </div>
Height of radiator above base insulator, or above base, if grounded (meters)	54.9
Electrical height of radiator (degrees)	88.3
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - NIGHTTIME OPERATION

d. Directional:

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

☐ Yes ☒ No

Exhibit No.

Theoretical mV/m at 1 km

Standard RMS: mV/rn at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☒ No

If "Yes," complete the following:

Augmented RMS: mV/m at 1 km

Azimuth Span Augmentation radiation

TECH BOX - CRITICAL HOURS OPERATION

6. Critical Hours Operation:

☐ Yes ☒ No

a. Power: _____ kW

b. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " ☐ N ☐ S Latitude
 _____ ° _____ ' _____ " ☐ E ☐ W Longitude

c. Nondirectional:

☐ Yes ☒ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<div style="text-align: center;">_____</div> <div style="text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (meters)	
A	
B	
C	
D	

TECH BOX - CRITICAL HOURS OPERATION

d. Directional:

if "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

☐ Yes ☒ No

Exhibit No.

Theoretical mV/m at 1 km

Standard RMS: mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div style="border-bottom: 1px solid black; display: inline-block; width: 100px;"></div> <div style="display: flex; justify-content: space-between;"> <div><input type="checkbox"/> Notification filed with FAA</div> <div><input type="checkbox"/> Not applicable</div> </div>	<div style="border-bottom: 1px solid black; display: inline-block; width: 100px;"></div> <div style="display: flex; justify-content: space-between;"> <div><input type="checkbox"/> Notification filed with FAA</div> <div><input type="checkbox"/> Not applicable</div> </div>	<div style="border-bottom: 1px solid black; display: inline-block; width: 100px;"></div> <div style="display: flex; justify-content: space-between;"> <div><input type="checkbox"/> Notification filed with FAA</div> <div><input type="checkbox"/> Not applicable</div> </div>	<div style="border-bottom: 1px solid black; display: inline-block; width: 100px;"></div> <div style="display: flex; justify-content: space-between;"> <div><input type="checkbox"/> Notification filed with FAA</div> <div><input type="checkbox"/> Not applicable</div> </div>
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☒ No

If "Yes," complete the following:

Augmented RMS: mV/m at 1 km

Azimuth

Span

Augmentation radiation

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

7. **Broadcast Facility.** The proposed facility complies with the engineering standards and assignment requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650. **Exhibit Required.**
- ☒ Yes ☐ No See Explanation in Exhibit No.
- Exhibit No.
See Tech. Exh.
8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).
- ☒ Yes ☐ No See Explanation in Exhibit No.
9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.
- ☒ Yes ☐ No See Explanation in Exhibit No.
10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.
- Groundwave.**
- a. ☒ 47 C.F.R. Section 73.37
- Exhibit No.
See Tech. Exh.
- Skywave.**
- b. ☒ 47 C.F.R. Section 73.182.
- Exhibit No.
See Tech. Exh.
- Critical Hours.**
- c. ☐ 47 C.F.R. Section 73.187.
- Exhibit No.
11. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.**
- ☒ Yes ☐ No See Explanation in Exhibit No.
- By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.
12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).
- ☐ Yes ☐ No ☒ N/A
- Exhibit No.
- An exhibit is required unless this question is not applicable.**
13. **Dispositive Section 307(b) Preference**
- a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?
- ☐ Yes ☒ No
- b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No ☒ N/A
- Exhibit No.
- c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No
- Exhibit No.

TECHNICAL SUMMARY

RADIO STATION WQSC
(FCC FACILITY ID 34590)
CHARLESTON, SC
1340 KHZ, 0.6 KW-D, U

1. WQSC is licensed for operation at Charleston, SC, at a frequency of 1340 kHz with a nominal non-directional power of 1 kW during unlimited-time hours.*

2. Due to the loss of the lease on its licensed transmitter site, it is necessary relocate the WQSC facility to a new location.

3. The instant application is to relocate the transmitter site to diplex on the existing north tower of the WTMZ (910 kHz) antenna array.† This represents a transmitter site move of 6.1 km (3.8 miles) north-northwest of the licensed site.

4. The existing north tower of the WTMZ array is not registered and does not require FCC registration.‡ There is no change in the height or location of the existing WTMZ north tower. It is noted that the existing south tower of the WTMZ array is to be dismantled in conjunction with the WQSC diplexing with WTMZ facility.

5. As demonstrated herein, the proposed WQSC daytime facility meets the 5-mV/m contour coverage requirements of its city of license of Charleston, SC. The daytime 5 mV/m contour of the proposed facility encompasses a population of 98,230 persons, which is 65.4% of the total population of Charleston of 150,237. Therefore, the proposed facility is compliant with the minimum 50% coverage requirement of Section 74.24(i) of the FCC Rules.

6. Regarding the compliance with the daytime contour protection requirements, a waiver of Section 73.37 the FCC Rules is respectfully requested. Class C stations normally employ a contour calculation assuming a power level of 250 watts with respect to other co-channel Class C stations. However, the 250-watt protection methodology is extremely restrictive for site relocation cases. For this reason, a waiver is requested to allow for the use of the ‘standard’ Class B/D daytime contour

* See FCC File No. BL-10887.

† See FCC File No. BL-19841114AB, Facility ID 72370.

‡ See FCC TowAir Study Results exhibit included with this filing.

calculation procedure with respect to other co-channel Class C stations.[§] In consideration of the use of the ‘standard’ Class B/D contour calculation method, the facility complies with the daytime allocation requirements of Sections 73.37. The facility complies with the requirements of Section 73.187 of the FCC Rules, as applicable.

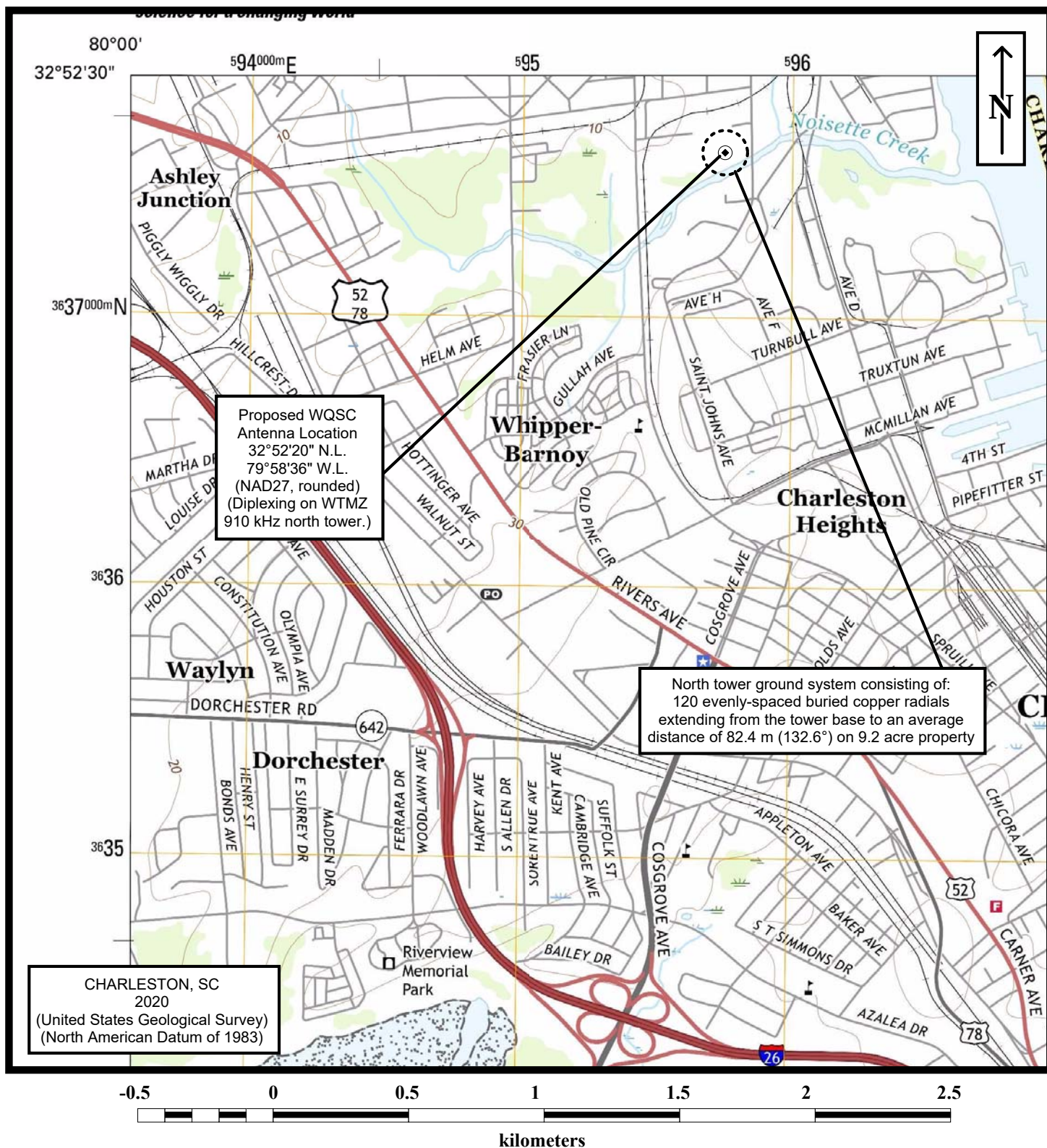
7. The ground system for the WTMZ north tower consists of 120 equally spaced, buried, copper radials averaging 82.4 meters in length, about the base of the tower, except where terminated by property boundaries.** The existing series-fed base-insulated transmitting antenna tower is to be employed with no changes. The tower has an element height of 54.9 m (electrical length of 88.3° at 1340 kHz). The antenna efficiency is calculated to be 304.56 mV/m at 1 km for 1 kW power based on FCC’s Figure 8 antenna efficiency calculation tool.

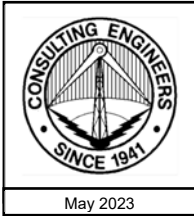
8. There are no other AM broadcast stations within close enough proximity to the proposed tower site to trigger possible AM antenna disturbance consideration under Section 1.30000 of the FCC Rules.

9. The proposed facility is compliant with Section 73.1030(c) of the FCC Rules concerning the protection of the closest FCC Monitoring Station at Powder Springs, GA, which is located 455 km away.

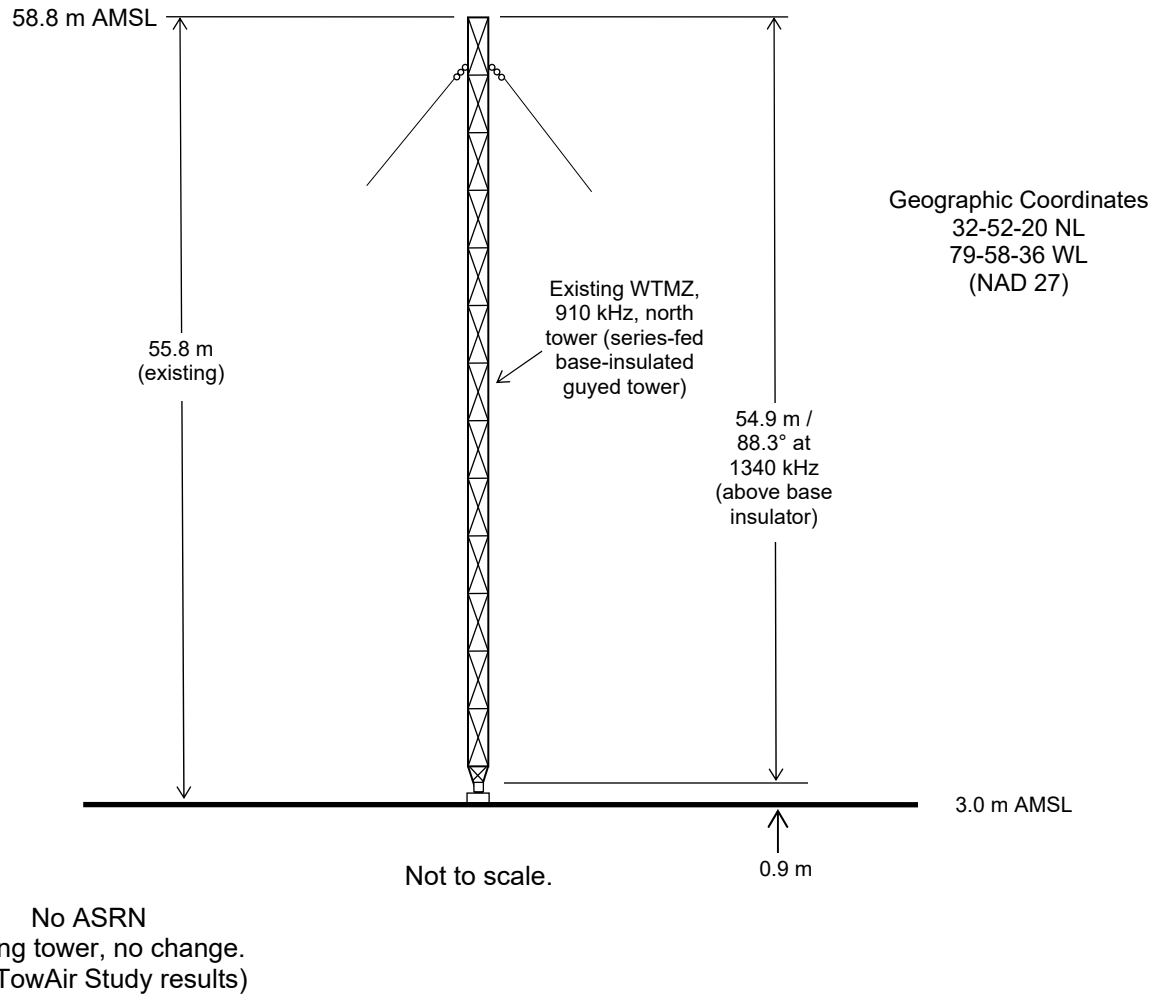
[§] See, for example, the FCC recently approved a waiver of Section 73.37 of the FCC Rules to allow for use of the ‘standard’ Class B/D contour methodology for evaluation of co-channel Class C stations in FCC File No. BP-20211122AC, Granted: February 25, 2022 (WRZX, Newnan, GA, 1400 kHz, Facility ID 48739).

** Electrical length of 132.6° at 1340 kHz.





May 2023



TOWER SKETCH

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

TOWAIR Determination Results

A routine check of the coordinates, heights, and structure type you provided indicates that this structure does not require registration.

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 6448.65 MTRS (6.44869 KM) AWAY

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	32-53-5.00N	080-02-44.00W	CHARLESTON AFB/INTL	CHARLESTON CHARLESTON, SC	6.3	2743.5

PASS SLOPE(100:1)NO FAA REQ - 5649.0 Meters (18533.2 Feet)away & below slope by 4.0 Meters (13.1199 Feet)

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	32-53-31.00N	080-01-56.00W	CHARLESTON AFB/INTL	CHARLESTON CHARLESTON, SC	6.3	2743.5

Your Specifications

NAD83 Coordinates

Latitude	32-52-20.6 north
Longitude	079-58-35.3 west

Measurements (Meters)

Overall Structure Height (AGL)	55.8
Support Structure Height (AGL)	54.9
Site Elevation (AMSL)	3.0

Structure Type

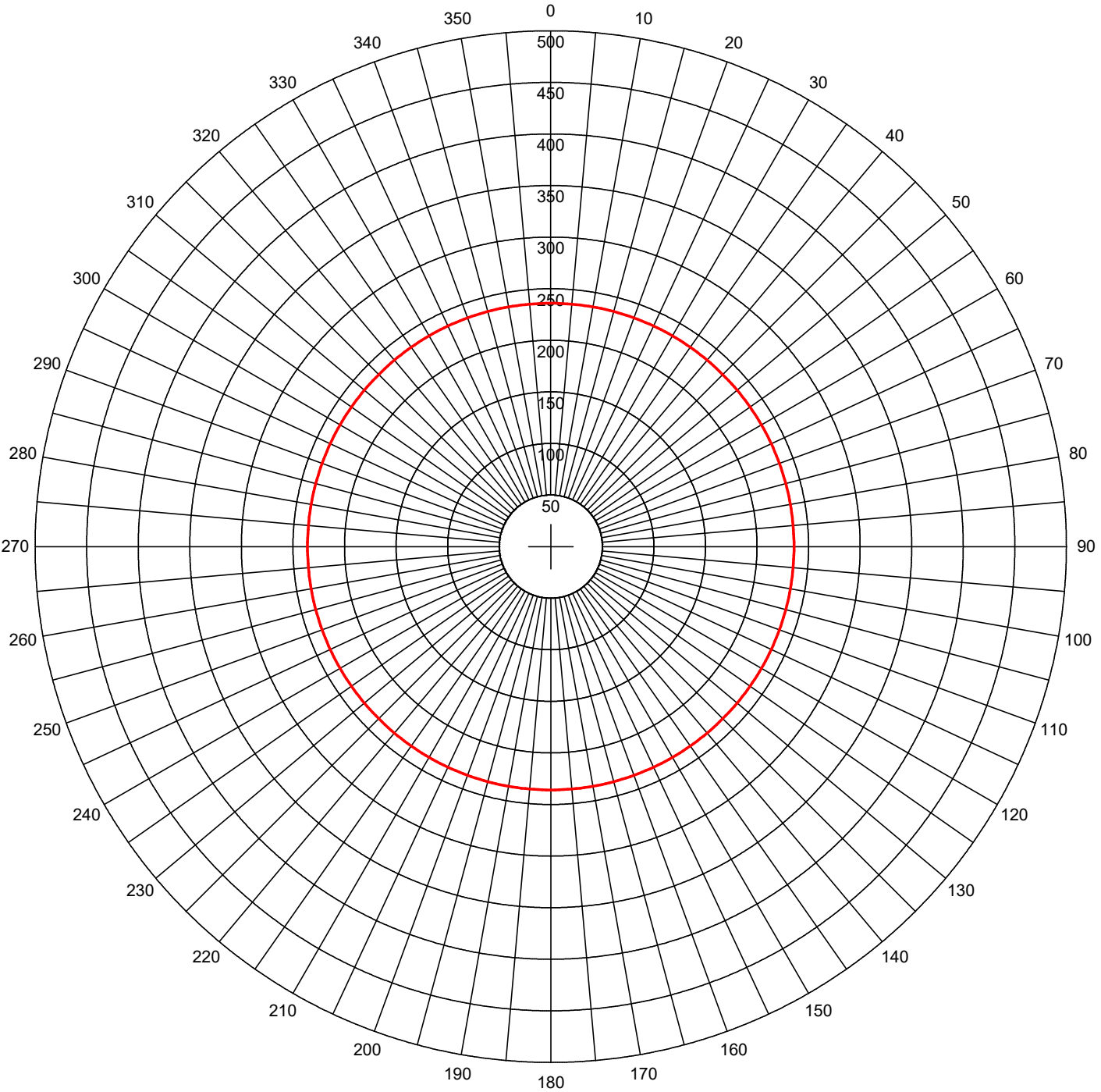
GTOWER - Guyed Structure Used for Communication Purposes

[Tower Construction Notifications](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

CLOSE WINDOW

Daytime and Nighttime Azimuth Pattern



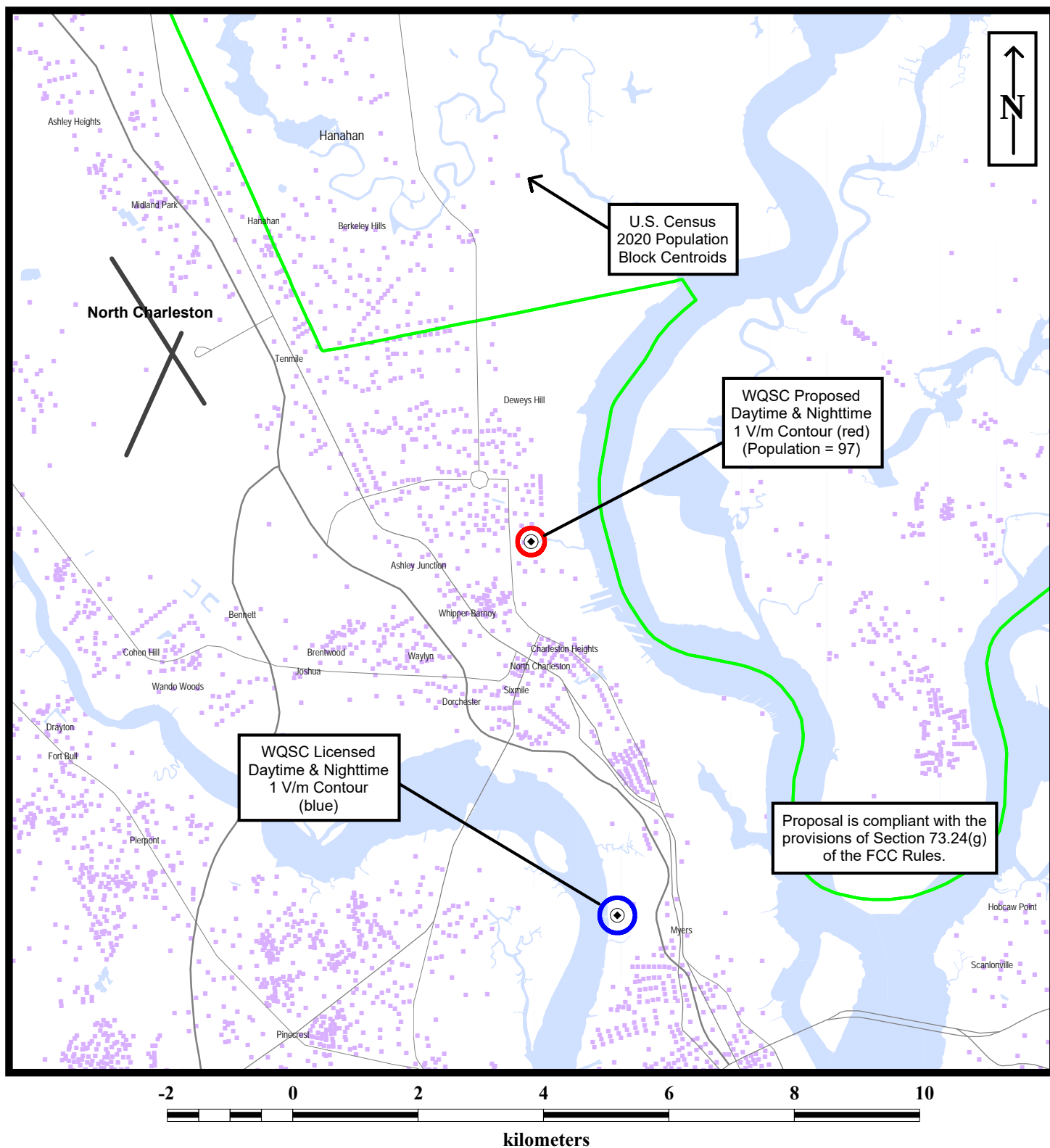
Erss = 235.91 mV/m@1km
Theo RMS: 235.91 mV/m@1km

Theoretical Horizontal Plane Pattern

— Pattern (mV/m @ 1km)
— Pattern X10

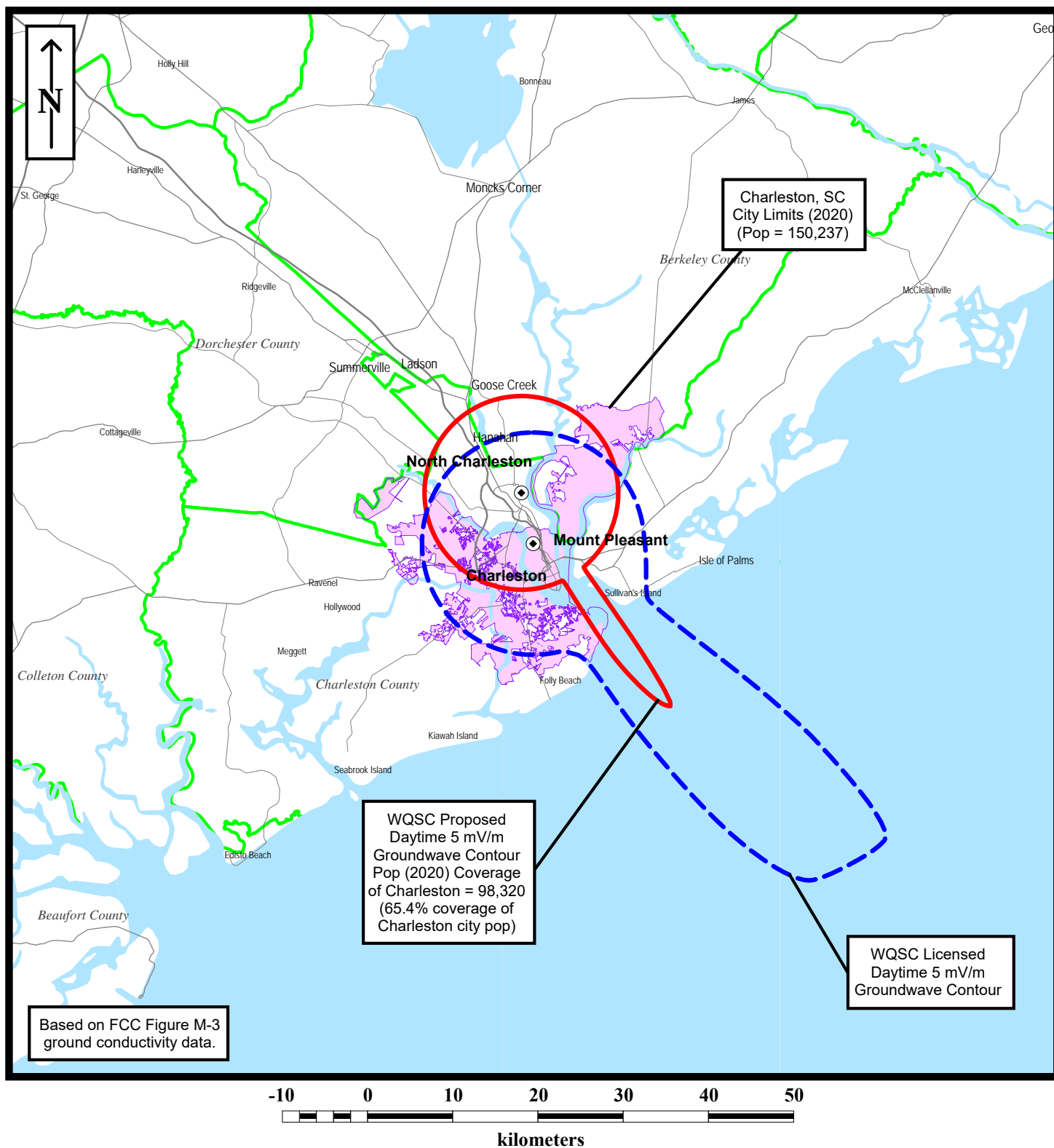
#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swth	TL Swth	A (deg)	B (deg)	C (deg)	D (deg)
1	1.000	0.0	0.0	0.0	88.3	0	0	0.0	0.0	0.0	0.0

Call: WQSC_d_p2
Freq: 1340 kHz
CHARLESTON, SC, US
Hours: U
Lat: 32-52-20 N [NAD27]
Lng: 079-58-36 W
Power: 0.6 kW
Theo RMS: 304.56 mV/m@1km



PREDICTED 1 V/M CONTOUR MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida



PREDICTED DAYTIME 5 mV/m GROUNDWAVE CONTOUR MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

AM Daytime Study

Reference Station:

Call: WQSC_d_p2
 Lat: 32-52-20 N
 Lng: 079-58-36 W

Freq: 1340 kHz

CHARLESTON, SC, US

Power: 0.6 kW

Theo RMS: 304.56 mV/m @ 1km

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swch	TL Swch	A (deg)	B (deg)	C (deg)	D (deg)
1	1.000	0.0	0.0	0.0	88.3	0	0	0.0	0.0	0.0	0.0

Call	Freq	City	ST	Dist	Azi	In	Out
WPJS	1330	CONWAY	SC	140.6	39.5	0.00	0.00
WLSG	1340	WILMINGTON	NC	245.3	51.5	24.50	36.75 /1/
WLSG	1340	WILMINGTON	NC	240.8	51.8	28.50	106.25 /1/
WSSC	1340	SUMTER	SC	121.6	344.5	49.00	572.50 /1/
WROD	1340	PORT ORANGE	FL	424.1	193.3	229.50	605.50 /1/
WROD	1340	DAYTONA BEAC	FL	420.1	193.3	216.25	689.25 /1/
WYNF	1340	AUGUSTA	GA	200.7	289.5	91.70	74.66
WAGR	1340	LUMBERTON	NC	211.5	25.4	85.33	79.01
WBBT	1340	LYONS	GA	233.0	251.1	105.91	96.43
WWFL	1340	CLERMONT	FL	503.5	198.8	409.27	99.93
WADE	1340	WADESBORO	NC	230.8	358.3	130.65	106.02
WRHI	1340	ROCK HILL	SC	253.2	337.3	134.96	116.82
WDSR	1340	LAKE CITY	FL	393.2	219.3	270.26	156.97
WGAU	1340	ATHENS	GA	339.7	289.5	205.02	200.02
WPOL	1340	WINSTON-SALE	NC	356.1	355.8	227.49	223.98
WTIF	1340	TIFTON	GA	365.7	243.9	238.52	229.03
WJRI	1340	LENOIR	NC	365.4	336.1	262.52	239.61
WCBQ	1340	OXFORD	NC	402.1	19.0	295.82	276.70
WIFN	1340	ATLANTA	GA	423.9	282.0	330.90	301.94
WGRV	1340	GREENEVILLE	TN	450.8	323.4	345.92	322.07
WOKS	1340	COLUMBUS	GA	471.0	263.0	344.66	334.36
WBLB	1340	PULASKI	VA	471.0	350.8	373.78	347.56

Notes:

/1/ - A waiver of Section 73.37 of the FCC Rules is requested to allow for the protection of co-channel stations on 1340 kHz using the 'standard' contour overlap method as is employed for Class B and D stations. See Technical Summary. For cases of existing contour overlap, the area of overlap is displayed excluding ocean water and with existing contour overlap area removed. Therefore, positive numbers in red represent a net decrease in predicted prohibited contour overlap. See Allocation Study maps. The proposal does not create any new prohibited contour overlap where such overlap did not previously exist.

ALLOCATION STUDY MAP WITH RESPECT WPJS

WQSC_d_p2

Freq: 1340 kHz

Class: C

Latitude: 32-52-20 N

Longitude: 079-58-36 W

Power: 0.6 kW

RMS: 304.559 mV/m @1km

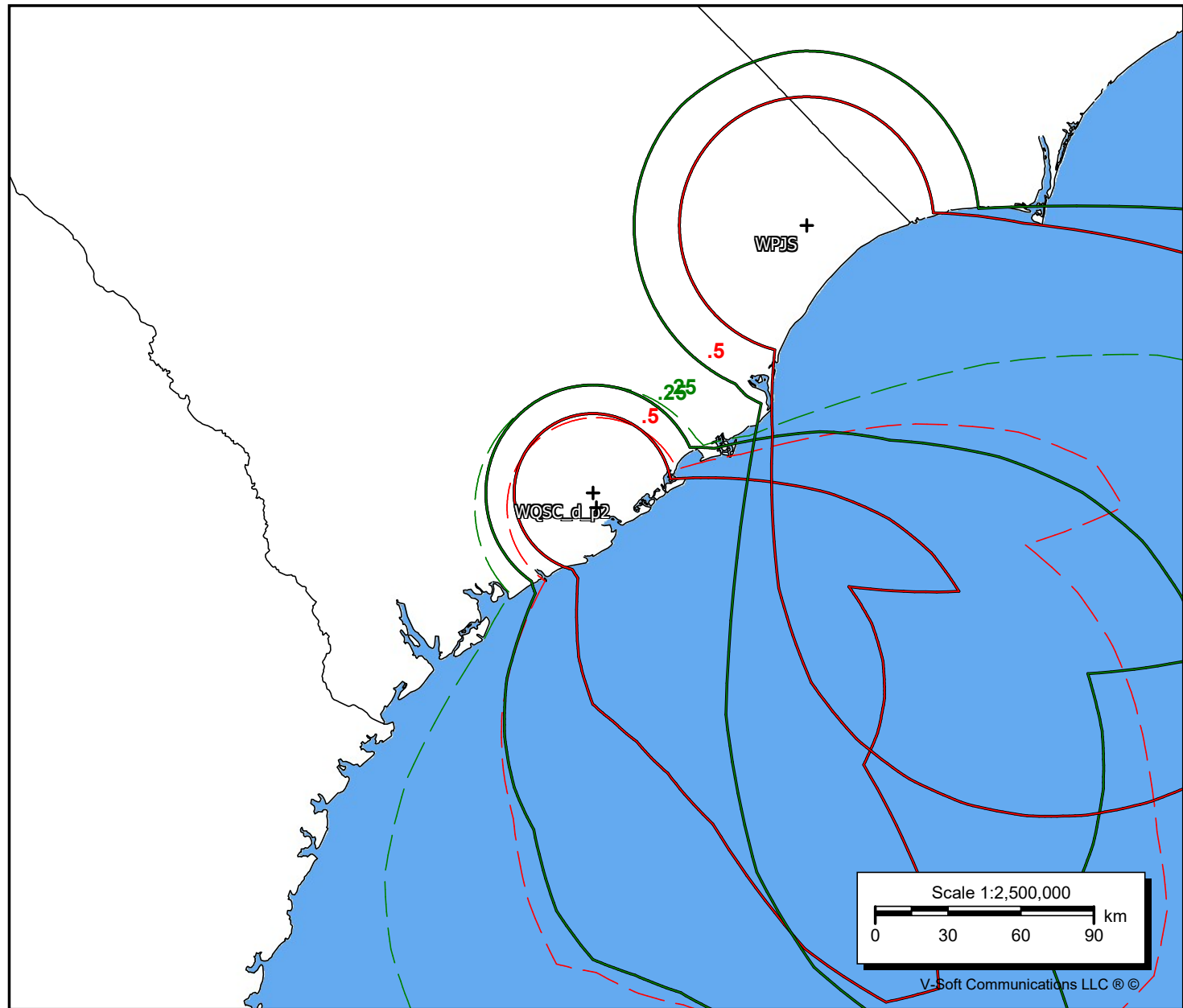
Towers: 1

Aucs: 0

Causes

Receives

No Ix



V-Soft Communications LLC ©

ALLOCATION STUDY MAP WITH RESPECT WLSG
(Contours based on 'standard' Class B/D calculation method.)

WQSC_d_p2

Freq: 1340 kHz

Class: C

Latitude: 32-52-20 N

Longitude: 079-58-36 W

Power: 0.6 kW

RMS: 304.559 mV/m @1km

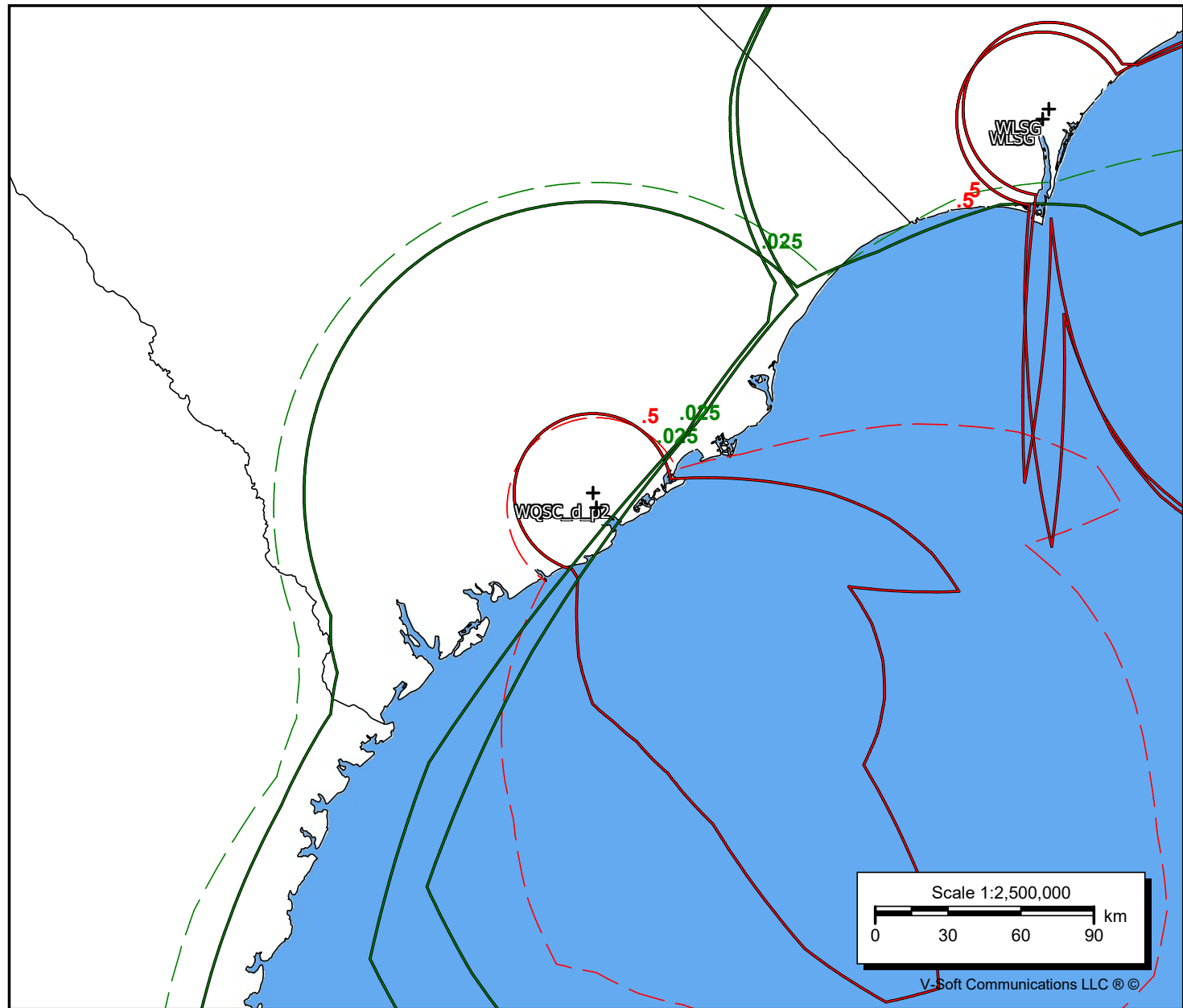
Towers: 1

Aucs: 0

Causes

Receives

No Ix



ALLOCATION STUDY MAP WITH RESPECT WSSC
(Contours based on 'standard' Class B/D calculation method.)

WQSC_d_p2

Freq: 1340 kHz

Class: C

Latitude: 32-52-20 N

Longitude: 079-58-36 W

Power: 0.6 kW

RMS: 304.559 mV/m @1km

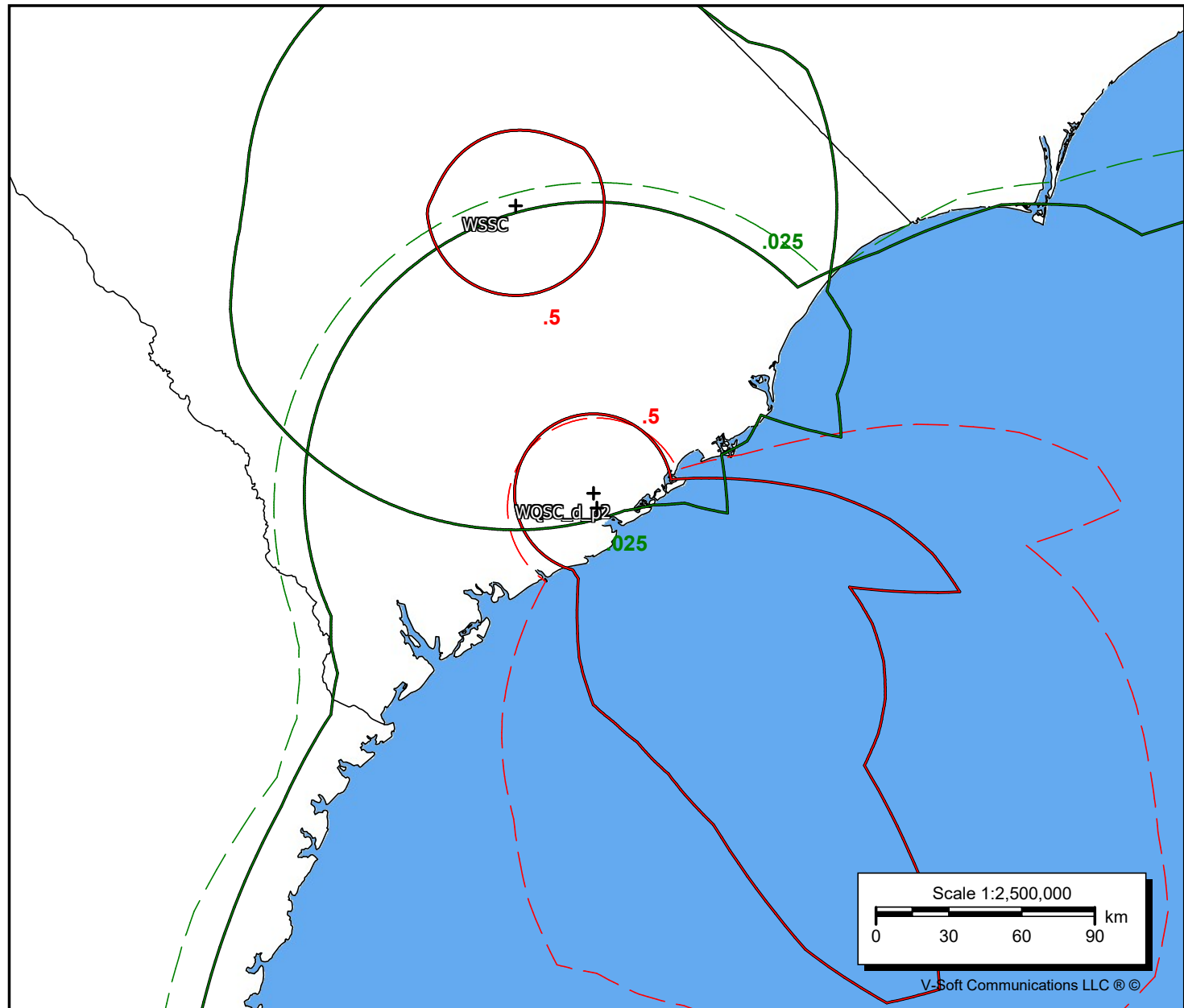
Towers: 1

Aucs: 0

— Causes

— Receives

— No Ix



ALLOCATION STUDY MAP WITH RESPECT WROD
(Contours based on 'standard' Class B/D calculation method.)

WQSC_d_p2

Freq: 1340 kHz

Class: C

Latitude: 32-52-20 N

Longitude: 079-58-36 W

Power: 0.6 kW

RMS: 304.559 mV/m @1km

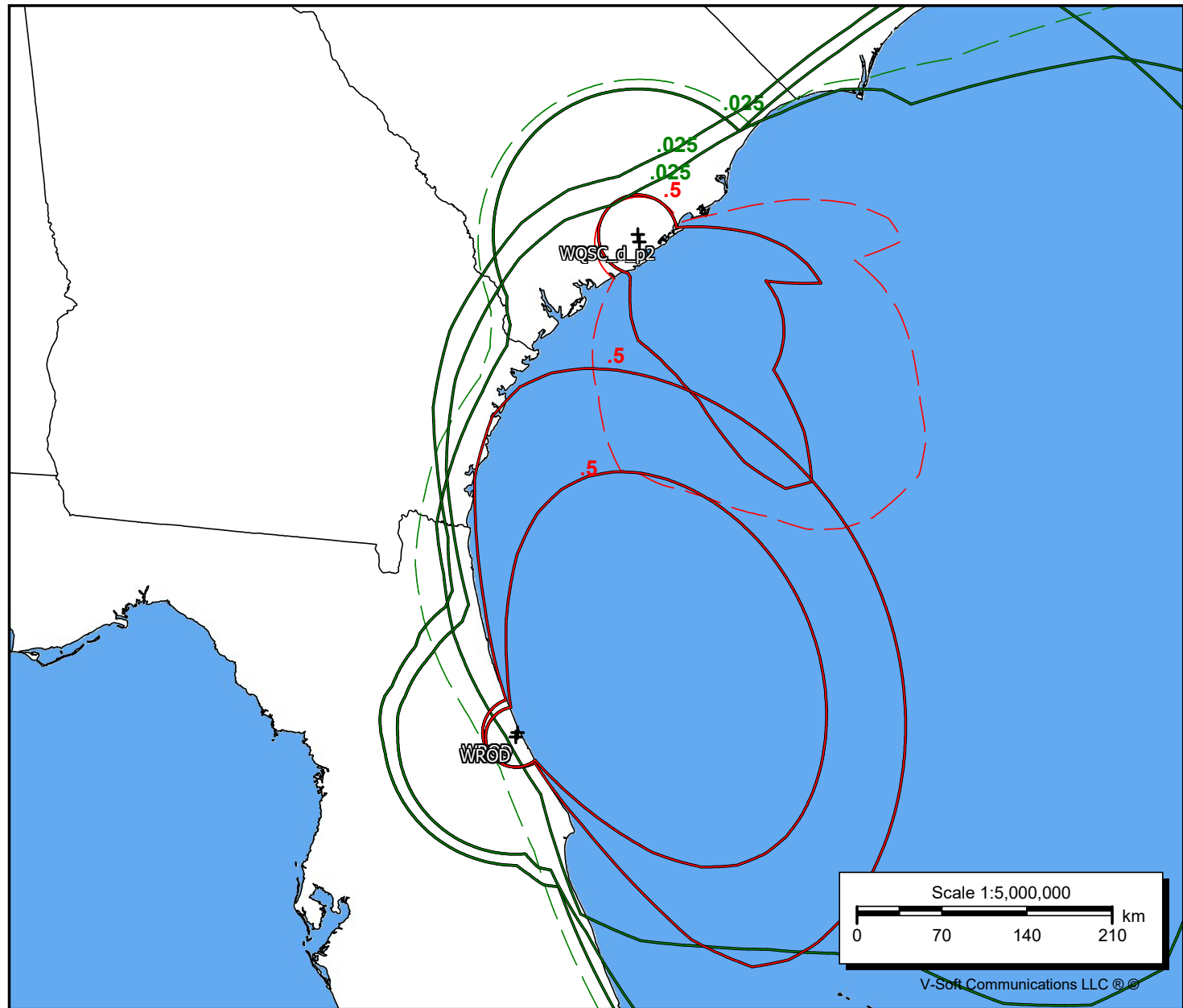
Towers: 1

Aucs: 0

— Causes

— Receives

— No Ix



STATIONS CONSIDERED IN DAYTIME ALLOCATION STUDY

Reference Station: WQSC_d_p2, 1340 kHz

Location: 32-52-20 N, 079-58-36 W

*** 1330 kHz (-1) ***
140.6 km WPJS L 33-51-13 N 079-01-14 W 3.2 kW ND2 - 333.9 mV/m@1km
87.4 mi Azi: 39.5 Class: D Sched: U File #: BL20051121AUI
Location: CONWAY, SC, US

*** 1340 kHz (CO) ***
121.6 km WSSC L 33-55-45 N 080-19-29 W 1.0 kW ND2 - 309.0 mV/m@1km
75.6 mi Azi: 344.5 Class: C Sched: U File #: BML20050920AGO
Location: SUMTER, SC, US
200.7 km WYNF L 33-29-37 N 081-59-52 W 1.0 kW ND2 - 293.3 mV/m@1km
124.7 mi Azi: 289.5 Class: C Sched: U File #: BL20081231ABJ
Location: AUGUSTA, GA, US
211.5 km WAGR L 34-35-58 N 079-00-33 W 1.0 kW ND1 - 346.0 mV/m@1km
131.4 mi Azi: 25.4 Class: C Sched: U File #: BL19840810AH
Location: LUMBERTON, NC, US
230.8 km WADE L 34-57-09 N 080-03-00 W 1.0 kW ND1 - 285.4 mV/m@1km
143.4 mi Azi: 358.3 Class: C Sched: U File #: BML20220321AAO
Location: WADESBORO, NC, US
233.0 km WBBT L 32-12-48 N 082-19-55 W 1.0 kW ND1 - 305.8 mV/m@1km
144.8 mi Azi: 251.1 Class: C Sched: U File #: BL9131
Location: LYONS, GA, US
240.8 km WLSG L 34-13-52 N 077-57-18 W 1.0 kW ND1 - 289.2 mV/m@1km
149.6 mi Azi: 51.8 Class: C Sched: U File #: BL20001012AAW
Location: WILMINGTON, NC, US
245.3 km WLSG C 34-16-02.10 N077-55-33.70 W1.0 kW ND2 - 287.2 mV/m@1km
152.4 mi Azi: 51.5 Class: C Sched: U File #: BP20210616AAD
Location: WILMINGTON, NC, US
253.2 km WRHI L 34-58-59 N 081-01-11 W 1.0 kW ND1 - 318.6 mV/m@1km
157.3 mi Azi: 337.3 Class: C Sched: U File #: BL19950807AD
Location: ROCK HILL, SC, US
339.7 km WGAU L 33-56-28 N 083-23-55 W 1.0 kW ND1 - 363.6 mV/m@1km
211.1 mi Azi: 289.5 Class: C Sched: U File #: BL10116
Location: ATHENS, GA, US
356.1 km WPOL L 36-04-26 N 080-15-19 W 1.0 kW ND1 - 384.6 mV/m@1km
221.3 mi Azi: 355.8 Class: C Sched: U File #: BL11248
Location: WINSTON-SALEM, NC, US
365.4 km WJRI L 35-53-39 N 081-33-30 W 1.0 kW ND1 - 309.7 mV/m@1km
227.0 mi Azi: 336.1 Class: C Sched: U File #: BL19990216DD
Location: LENOIR, NC, US
365.7 km WTIF L 31-28-16 N 083-29-12 W 1.0 kW ND2 - 305.8 mV/m@1km
227.2 mi Azi: 243.9 Class: C Sched: U File #: BML20221111AAA
Location: TIFTON, GA, US
393.2 km WDSR L 30-09-20 N 082-38-14 W 1.0 kW ND1 - 404.0 mV/m@1km
244.3 mi Azi: 219.3 Class: C Sched: U File #: BL8644
Location: LAKE CITY, FL, US
402.1 km WCBQ L 36-18-27 N 078-34-37 W 1.0 kW ND1 - 304.2 mV/m@1km
249.9 mi Azi: 19.0 Class: C Sched: U File #: BL8780
Location: OXFORD, NC, US
420.1 km WROD L 29-11-19 N 081-00-28 W 1.0 kW ND1 - 360.5 mV/m@1km
261.0 mi Azi: 193.3 Class: C Sched: U File #: BL8884
Location: DAYTONA BEACH, FL, US
423.9 km WIFN L 33-44-56 N 084-24-26 W 1.0 kW ND1 - 275.2 mV/m@1km
263.4 mi Azi: 282.0 Class: C Sched: U File #: BL13544
Location: ATLANTA, GA, US
424.1 km WROD A 29-09-16.90 N081-01-19.20 W1.0 kW ND2 - 266.1 mV/m@1km
263.5 mi Azi: 193.3 Class: C Sched: U File #: BP20230209AAG
Location: PORT ORANGE, FL, US
450.8 km WGRV L 36-10-10 N 082-50-52 W 1.0 kW ND1 - 296.1 mV/m@1km
280.1 mi Azi: 323.4 Class: C Sched: U File #: BL14275
Location: GREENEVILLE, TN, US
471.0 km WBLB L 37-03-57 N 080-47-03 W 1.0 kW ND1 - 264.0 mV/m@1km
292.7 mi Azi: 350.8 Class: C Sched: U File #: BL19811211AF
Location: PULASKI, VA, US
471.0 km WOKS L 32-27-07 N 084-58-25 W 1.0 kW ND1 - 296.1 mV/m@1km
292.7 mi Azi: 263.0 Class: C Sched: U File #: BL9401
Location: COLUMBUS, GA, US
503.5 km WWFL L 28-34-59 N 081-42-19 W 1.0 kW ND1 - 241.0 mV/m@1km
312.8 mi Azi: 198.8 Class: C Sched: U File #: BL19970214AB
Location: CLERMONT, FL, US

TABULATION OF GROUND CONDUCTIVITY USED FOR DAYTIME ALLOCATION STUDY

Latitude: 32-52-20 N
Longitude: 079-58-36 W

Conductivity Database Used: M3 (USA)

Ground Conductivity Data: Region conductivity in mS/m followed by distance in km to the end of region. E - map data; M - measurement data.										
Azimuth										
0.0	4.0E	143.4	2.0E	252.4	4.0E	353.8	2.0E	414.7	4.0E	416.2
	2.0E	500.0								
5.0	4.0E	149.4	2.0E	271.2	4.0E	460.7	2.0E	500.0		
10.0	4.0E	157.0	2.0E	295.3	4.0E	457.7	2.0E	500.0		
15.0	4.0E	167.8	2.0E	306.3	4.0E	419.4	2.0E	500.0		
20.0	4.0E	181.9	2.0E	302.4	4.0E	341.5	2.0E	500.0		
25.0	4.0E	200.3	2.0E	295.4	4.0E	338.8	2.0E	500.0		
30.0	4.0E	226.7	2.0E	286.2	4.0E	338.6	2.0E	500.0		
35.0	4.0E	259.5	2.0E	275.1	4.0E	341.5	2.0E	500.0		
40.0	4.0E	458.8	5000.0E	465.0	4.0E	500.0				
45.0	4.0E	403.9	5000.0E	409.9	4.0E	425.6	5000.0E	426.1	4.0E	496.5
	5000.0E	500.0								
50.0	4.0E	85.1	5000.0E	89.9	4.0E	112.2	5000.0E	167.2	4.0E	304.4
	5000.0E	308.9	4.0E	311.3	5000.0E	312.9	4.0E	367.2	5000.0E	372.7
	4.0E	400.3	5000.0E	407.9	4.0E	408.8	5000.0E	436.7	4.0E	438.8
	5000.0E	441.9	4.0E	481.4	5000.0E	485.2	4.0E	497.5	5000.0E	499.3
	4.0E	500.0								
55.0	4.0E	79.6	5000.0E	84.1	4.0E	91.3	5000.0E	199.9	4.0E	226.5
	5000.0E	229.3	4.0E	237.4	5000.0E	369.2	4.0E	374.0	5000.0E	380.5
	4.0E	405.1	5000.0E	500.0						
60.0	4.0E	81.5	5000.0E	84.1	4.0E	85.8	5000.0E	500.0		
65.0	4.0E	79.4	5000.0E	500.0						
70.0	4.0E	40.8	5000.0E	51.1	4.0E	56.9	5000.0E	500.0		
75.0	4.0E	37.2	5000.0E	500.0						
80.0	4.0E	33.9	5000.0E	500.0						
85.0	4.0E	29.1	5000.0E	500.0						
90.0	4.0E	25.7	5000.0E	500.0						
95.0	4.0E	23.2	5000.0E	500.0						
100.0	4.0E	21.3	5000.0E	500.0						
105.0	4.0E	19.9	5000.0E	500.0						
110.0	4.0E	24.2	5000.0E	500.0						
115.0	4.0E	22.8	5000.0E	500.0						
120.0	4.0E	21.7	5000.0E	500.0						
125.0	4.0E	20.8	5000.0E	500.0						
130.0	4.0E	20.2	5000.0E	500.0						
135.0	4.0E	19.7	5000.0E	500.0						
140.0	4.0E	13.7	5000.0E	500.0						
145.0	4.0E	7.7	5000.0E	500.0						
150.0	4.0E	9.2	5000.0E	500.0						
155.0	4.0E	11.7	5000.0E	15.9	4.0E	18.4	5000.0E	23.5	4.0E	23.7
	5000.0E	500.0								
160.0	4.0E	18.8	5000.0E	21.6	4.0E	23.9	5000.0E	500.0		
165.0	4.0E	19.3	5000.0E	20.2	4.0E	24.4	5000.0E	500.0		
170.0	4.0E	25.1	5000.0E	500.0						
175.0	4.0E	26.0	5000.0E	500.0						
180.0	4.0E	26.8	5000.0E	500.0						
185.0	4.0E	26.3	5000.0E	28.4	4.0E	30.8	5000.0E	500.0		
190.0	4.0E	32.2	5000.0E	451.2	2.0E	478.0	8.0E	500.0		
195.0	4.0E	33.9	5000.0E	403.8	2.0E	500.0				
200.0	4.0E	36.1	5000.0E	364.5	8.0E	374.9	2.0E	500.0		
205.0	4.0E	38.9	5000.0E	320.6	8.0E	340.8	4.0E	382.1	2.0E	500.0
210.0	4.0E	43.7	5000.0E	277.4	8.0E	307.4	4.0E	379.8	2.0E	431.3
	4.0E	500.0								
215.0	4.0E	51.4	5000.0E	244.2	8.0E	247.3	5000.0E	256.9	8.0E	275.1
	4.0E	358.8	2.0E	403.6	4.0E	498.1	5000.0E	500.0		
220.0	4.0E	56.7	5000.0E	178.4	8.0E	192.5	5000.0E	201.7	8.0E	234.2
	4.0E	349.1	2.0E	410.7	4.0E	494.5	5000.0E	500.0		
225.0	4.0E	58.2	5000.0E	68.1	8.0E	88.6	5000.0E	114.0	8.0E	126.8
	5000.0E	154.2	8.0E	189.4	4.0E	338.8	2.0E	485.5	5000.0E	500.0
230.0	4.0E	62.5	5000.0E	67.3	4.0E	70.2	8.0E	92.7	5000.0E	98.8
	8.0E	151.9	4.0E	336.5	2.0E	486.6	5000.0E	500.0		
235.0	4.0E	74.9	8.0E	91.3	5000.0E	94.7	8.0E	110.6	4.0E	336.0
	2.0E	500.0								
240.0	4.0E	80.8	8.0E	88.5	5000.0E	93.0	8.0E	94.7	4.0E	337.1
	2.0E	500.0								
245.0	4.0E	362.0	2.0E	379.0	4.0E	500.0				

TABULATION OF GROUND CONDUCTIVITY USED FOR DAYTIME ALLOCATION STUDY

Latitude: 32-52-20 N
Longitude: 079-58-36 W

Conductivity Database Used: M3 (USA)

Ground Conductivity Data:									
Region conductivity in mS/m followed by distance in km									
to the end of region. E - map data; M - measurement data.									
Azimuth									
250.0	4.0E	500.0							
255.0	4.0E	500.0							
260.0	4.0E	500.0							
265.0	4.0E	500.0							
270.0	4.0E	177.1	2.0E	222.9	4.0E	500.0			
275.0	4.0E	168.2	2.0E	233.0	4.0E	427.5	2.0E	500.0	
280.0	4.0E	161.9	2.0E	229.6	4.0E	380.4	1.0E	419.8	2.0E 500.0
285.0	4.0E	156.7	2.0E	220.0	4.0E	370.0	1.0E	417.7	2.0E 500.0
290.0	4.0E	152.8	2.0E	211.3	4.0E	372.9	2.0E	384.0	1.0E 414.8
	2.0E	498.4	4.0E	500.0					
295.0	4.0E	150.1	2.0E	204.4	4.0E	356.0	2.0E	468.8	4.0E 500.0
300.0	4.0E	148.1	2.0E	198.2	4.0E	340.0	2.0E	472.1	4.0E 500.0
305.0	4.0E	146.7	2.0E	193.6	4.0E	322.6	2.0E	500.0	
310.0	4.0E	144.0	2.0E	190.6	4.0E	304.5	2.0E	500.0	
315.0	4.0E	141.5	2.0E	189.1	4.0E	282.9	2.0E	500.0	
320.0	4.0E	139.5	2.0E	189.0	4.0E	266.0	2.0E	500.0	
325.0	4.0E	136.7	2.0E	189.6	4.0E	255.5	2.0E	440.1	4.0E 500.0
330.0	4.0E	135.0	2.0E	191.6	4.0E	254.9	2.0E	439.1	4.0E 500.0
335.0	4.0E	134.4	2.0E	195.1	4.0E	260.3	2.0E	441.5	4.0E 500.0
340.0	4.0E	134.7	2.0E	201.2	4.0E	268.1	2.0E	447.4	4.0E 500.0
345.0	4.0E	135.2	2.0E	210.0	4.0E	281.0	2.0E	500.0	
350.0	4.0E	136.7	2.0E	221.2	4.0E	307.1	2.0E	500.0	
355.0	4.0E	139.3	2.0E	235.7	4.0E	335.7	2.0E	500.0	

NIGHTTIME ALLOCATION STUDY FOR WTMZ, 910 KHZ (SUMMARY)

Night Allocation Protection Report

Call: WQSC_n_p2
Freq: 1340 kHz
CHARLESTON, SC, US
Hours: U
Lat: 32-52-20 N [NAD27]
Lng: 079-58-36 W
Power: 0.6 kW
Theo RMS: 304.56 mV/m @ 1km @ 1kW

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swch	TL Swch	A (deg)	B (deg)	C (deg)	D (deg)
1	1.000	0.0	0.0	0.0	88.3	0	0	0.0	0.0	0.0	0.0

Call Letters	Ct	St	City	SWFF (100uV/m)	Req Prot (mV/m)	Permis (mV/m)	Cur Rad (mV/m)	Margin (mV/m)
ZBM 2-A (262)	BD		HAMILTON	27.62	1.695	306.78S	231.45	75.32
50% = 3.714, 25% = 5.59; WAGR=1.97 WLSG=1.93 WMID=1.81 WQSC=1.69 WPOL=1.69 WHAP=1.69 WCBQ=1.65 WROD=1.56 WSSC=1.55 WHAT=1.48 WADE=1.42								
WYRD		US SC	GREENVILLE	203.76	1.166	286.20	208.08	78.11
50% = 2.827, 25% = 4.701; WBTM=1.59 WJRI=1.38 WSSC=1.34 WYNF=1.33 KNSS=1.33 WADE=1.31 WRHI=1.31 XEFC/A=1.28 WBAC=1.24 WGAA=1.22 WKGN=1.21 WIFN=1.19 YVPJ-A=1.17								
CMFL-D		CU	PALMIRA	18.81	2.211	587.54	233.72	353.82
50% = 4.847, 25% = 5.762; WITS=2.63 WPBR=2.44 WROD=2.40 WDSR=2.21 WTAN=2.09 WWFL=1.80 WTYS=1.45								
CKDK/U		CA ON	WOODSTOCK	50.97	7.659	751.33	233.37	517.95
50% = 16.736, 25% = 28.504; WLVL=9.66 WMBO=8.17 CKNR/A=7.84 WTRN=7.66 WJRW=7.63 WIZE=7.48 WCMi=7.42 WTRC=7.39 WWPA=7.39 NEW TEMISCAMING/A=7.28 WMSA=7.14 WJOI=7.09 WEPM=7.07 WLEW=7.06								
CKDK/U		CA ON	WOODSTOCK	50.97	7.659	751.33	233.37	517.95
50% = 16.736, 25% = 28.504; WLVL=9.66 WMBO=8.17 CKNR/A=7.84 WTRN=7.66 WJRW=7.63 WIZE=7.48 WCMi=7.42 WTRC=7.39 WWPA=7.39 NEW TEMISCAMING/A=7.28 WMSA=7.14 WJOI=7.09 WEPM=7.07 WLEW=7.06								
WBTM		US VA	DANVILLE	149.37	2.554	854.76	219.61	635.15
50% = 9.623, 25% = 10.214; WYRD=9.62 WBGW=3.42								
WBML		US GA	WARNER ROBINS	186.46	4.248	1139.20	212.15	927.06
50% = 15.334, 25% = 17.246; WTDR=12.28 WARF=9.18 WDCF=5.09 WMMV=4.28 WLOU=4.25								

RF HAZARD STATEMENT

RADIO STATION WQSC
CHARLESTON, SC
1340 KHZ, 0.6 KW, U

This statement was prepared for AM broadcast station WQSC, Charleston, South Carolina (1340 kHz). This statement concerns an evaluation of compliance with Section 1.1307(b) of the FCC Rules* regarding human exposure to radio frequency (RF) energy.†

The proposed WQSC facility will operate with a non-directional antenna with a nominal unlimited power level of 0.6 kW. The proposed WQSC facility will be diplexed on the existing WTMZ north tower. The antenna tower element has an electrical height of 88.3° (0.245 wavelength) at 1340 kHz.

The antenna tower is accessible only by a narrow raised wooden walkway, which is restricted from access by a locked gate that is located more than 60 m from the tower. Utilizing the data provided in Supplement A of the FCC OET Bulletin No. 65‡, it was determined that the energy from the facility will be well within the FCC maximum permissible exposure limit at the worst-case minimum fence distance of 3 meters. Therefore, the instant proposal is compliant with the FCC's RF exposure requirements. In the event that personnel are required to enter the restricted area, the power level shall be reduced or terminated as necessary to prevent human exposure to radio frequency energy in excess of FCC specified levels.

* See Rules of the United States Federal Communications Commission (FCC), generally at Title 47 of the Code of Federal Regulations (Telecommunication).

† See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:
http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf

‡ See FCC Office of Engineering and Technology Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*, Edition 97-01, released August, 1997, and *Supplement A: Additional Information for Radio and Television Broadcast Stations*

Exhibit A
Multiple Ownership WQSC(AM)
FCC Form 301
May 2023

The instant application requests minor modification of license of Station WQSC(AM), FCC Facility ID No. 34590, Charleston, South Carolina ("*WQSC(AM)*"), licensed to Kirkman Broadcasting, Inc. ("*Kirkman*"). For purposes of the FCC's local radio ownership rule, WQSC (AM) is deemed to be a part of the Charleston, South Carolina radio market.

The attached exhibit, FCC Geographic Market Definition for Charleston, South Carolina, was compiled on May 10, 2023 using BIA Research, Inc.'s Media Access Pro database. The exhibit lists all radio stations, including WQSC (AM), that are licensed to communities within the counties comprising the Charleston, South Carolina Nielsen Audio Metro or that Nielsen Audio designates as "home" to the Charleston, South Carolina Audio Metro. As demonstrated in the exhibit, there are 34 stations in the Charleston, South Carolina market. Under the local radio ownership rule, a person or single entity (or entities under common control) in a radio market with between 30 and 44 or more full-power, commercial and noncommercial radio stations may have a cognizable interest in not more than 7 commercial radio stations in total, and not more than 4 commercial stations in the same service (AM or FM). 47 C.F.R. § 73.3555(a)(1)(ii). As shown in the attached exhibit, Kirkman owns the following stations in the Charleston

WTMZ-FM, McClellanville, SC (FCC Facility ID No. 24201)
WQNT(AM), Charleston, SC (FCC Facility ID No. 31946)
WQSC(AM), Charleston, SC (FCC Facility ID No. 34590)
WJNI(FM), Ladson, SC (FCC Facility ID No. 66798)
WTMZ(AM), Dorchester Terrace-Brentwood, SC (FCC Facility ID No. 72370)

Upon completion of the proposed modification, there will be no change in ownership and Kirkman will remain in compliance with the limits prescribed by the rule.



FCC Geographic Market Definition for Charleston, SC

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WALC	FM	100.5	NC	ChrsContem	Charleston, SC	07/02/2003	76	Radio Training Network, Inc	Charleston, SC	Charleston
WAVF	FM	101.7	C	Adult Hits	Charleston, SC	07/02/2003	76	Saga Communications Inc	Hanahan, SC	Berkeley
WAYA	FM	100.9	C	ChrsContem	Charleston, SC	07/02/2003	76	Hope Media Group	Ridgeville, SC	Dorchester
WAZS	AM	980	C	Mexican	Charleston, SC	07/02/2003	76	Norsan Consulting and Management Inc	Summerville, SC	Dorchester
WCDC	AM	950	C	DARK	Charleston, SC	07/02/2003	76	Moody Bible Institute of Chicago Incorporated	Moncks Corner, SC	Berkeley
WCKN	FM	92.5	C	Country	Charleston, SC	07/02/2003	76	Saga Communications Inc	Moncks Corner, SC	Berkeley
WCOO	FM	105.5	C	AAA	Charleston, SC	07/02/2003	76	L M Communications	Kiawah Island, SC	Charleston
WEZL	FM	103.5	C	Country	Charleston, SC	07/02/2003	76	iHeartMedia Inc	Charleston, SC	Charleston
WFCH	FM	88.5	NC	Religion	Charleston, SC	07/02/2003	76	Family Stations Incorporated	Charleston, SC	Charleston
WIWF	FM	96.9	C	Clsc Hits	Charleston, SC	07/02/2003	76	Cumulus Media Holdings Inc	Charleston, SC	Charleston
WJNJ	FM	106.3	C	Urban Gosp	Charleston, SC	07/02/2003	76	Kirkman Broadcasting Inc	Ladson, SC	Berkeley
WKCL	FM	91.5	NC	Christian	Charleston, SC	07/02/2003	76	Chapel Holy Spirit Church & Bible Co	Ladson, SC	Berkeley
WLTQ	AM	730	NC	Chrst/Talk	Charleston, SC	07/02/2003	76	Mediatrix SC Inc	Charleston, SC	Charleston
WMGL	FM	107.3	C	Urban AC	Charleston, SC	07/02/2003	76	Cumulus Media Holdings Inc	Ravenel, SC	Charleston
WMXZ	FM	95.9	C	Adult Hits	Charleston, SC	06/11/2008	76	Saga Communications Inc	Isle Of Palms, SC	Charleston
WQNT	AM	1450	C	Oldies	Charleston, SC	07/02/2003	76	Kirkman Broadcasting Inc	Charleston, SC	Charleston
WQSC	AM	1340	C	Sports	Charleston, SC	07/02/2003	76	Kirkman Broadcasting Inc	Charleston, SC	Charleston
WRFQ	FM	104.5	C	Clsc Rock	Charleston, SC	07/02/2003	76	iHeartMedia Inc	Mount Pleasant, SC	Charleston
WSCC	FM	94.3	C	News/Talk	Charleston, SC	07/02/2003	76	iHeartMedia Inc	Goose Creek, SC	Berkeley
WSCI	FM	89.3	NC	Clsc/News	Charleston, SC	07/02/2003	76	South Carolina Educational Television	Charleston, SC	Charleston
WSPO	AM	1390	C	Gospel	Charleston, SC	07/02/2003	76	Saga Communications Inc	Charleston, SC	Charleston
WSSX	FM	95.1	C	CHR	Charleston, SC	07/02/2003	76	Cumulus Media Holdings Inc	Charleston, SC	Charleston
WTMA	AM	1250	C	News/Talk	Charleston, SC	07/02/2003	76	Cumulus Media Holdings Inc	Charleston, SC	Charleston
WTMZ	AM	910	C	Sports	Charleston, SC	07/02/2003	76	Kirkman Broadcasting Inc	Dorchester Terr.-Bre, SC	Dorchester
WTMZ	FM	98.9	C	Sports	Charleston, SC	07/02/2003	76	Kirkman Broadcasting Inc	McClellanville, SC	Charleston
WTUA	FM	106.1	C	Inspiration	Charleston, SC	07/02/2003	76	Glory Communications Inc	St. Stephen, SC	Berkeley
WWOS	FM	91.9	NC	Religion	Charleston, SC	09/28/2012	76	Grace Baptist Church of Orangeburg	St. George, SC	Dorchester
WWWZ	FM	93.3	C	Urban	Charleston, SC	07/02/2003	76	Cumulus Media Holdings Inc	Summerville, SC	Dorchester
WXLY	FM	102.5	C	AC	Charleston, SC	07/02/2003	76	iHeartMedia Inc	North Charleston, SC	Charleston
WXST	FM	99.7	C	Urban AC	Charleston, SC	07/02/2003	76	Saga Communications Inc	Hollywood, SC	Charleston
WYBB	FM	98.1	C	Modern	Charleston, SC	07/02/2003	76	L M Communications	Folly Beach, SC	Charleston
WYFH	FM	90.7	NC	Christian	Charleston, SC	07/02/2003	76	Bible Broadcasting Network Inc	North Charleston, SC	Charleston
WZJY	AM	1480	C	Latno/Pop	Charleston, SC	07/02/2003	76	Norsan Consulting and Management Inc	Mount Pleasant, SC	Charleston
WZLC	FM	88.9	NC	ChrsContem	Charleston, SC	01/17/2014	76	Radio Training Network, Inc	Summerville, SC	Dorchester

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Charleston, SC

Call Letters	AM/ FM	Type Freq	Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
Number of Stations in Geographic Market						34				
<u>Previous Stations in Geographic Market</u>										
WNKT	FM	107.5	C	Sports	Columbia, SC	12/06/2007	90	Cumulus Media Holdings Inc	Eastover, SC	Richland

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed