

**Golden Gulf Coast Broadcasting, Inc.
9994 Rodriguez Street, Suite G.
Biloxi, Mississippi 39540
Phone: (228) 396-3131**

**Federal Communications Commission
Washington, D.C. 20554**

**Re: Station WQYZ(FM), Ocean Springs, Mississippi
Facility ID No. 24513
License Application BLH-20010118ABJ**

Dear Sir or Madam:

Please amend the above-referenced application for license covering modifications to the operating facilities of Station WQZY(FM), Ocean Springs, Mississippi ("WQYZ") to include the attached information on the status of efforts to complete partial proof measurements on Station WVMI(AM), Biloxi, Mississippi.

**Respectfully submitted,
Golden Gulf Coast Broadcasting, Inc.**

By:



Lawrence E. Steelman, President

October 5, 2001

Re: Amendment to Pending License Application BLH-20010118ABJ
for Station WQYZ(FM), Ocean Springs, Mississippi
Facility ID No. 24513

By letter dated September 5, 2001, the Commission directed Golden Gulf Coast Broadcasting, Inc. ("GGCB") to amend the above-referenced license application and that: "at a minimum, post-construction partial proof measurements verifying that WVMi has not been adversely affected by the WQYZ construction and is operating in accordance with its license, must be done and submitted to the Commission." GGCB submits the following information with respect to its efforts to comply with this directive.

To our knowledge, WVMi(AM) is not operating in accordance with its license for reasons totally unrelated to the installation of the WQYZ antenna and transmission line. After a thorough review of the FCC files for WVMi, GGCB has been unable to locate any evidence that the station has asked for authority to operate with parameters at variance from its licensed values, although we believe that the station is operating at variance. Station WVMi operates with different directional patterns day and night.

Attached hereto is the Declaration of Carr Stalnaker, an experienced engineer, who was retained to conduct field strength measurements on WVMi. Specifically, he went to WVMi on March 31, 2001 to take measurements on both the daytime and nighttime patterns of WVMi. He completed the daytime field strength readings, and found that the 61° monitoring point for WVMi was out of tolerance. However, he also learned that the monitoring point was out of tolerance to approximately the same degree even before the tower which is used by WQYZ was constructed, and had apparently been out of tolerance at that monitor point for some time. At the same time, he attempted to take field strength readings on the WVMi nighttime pattern, but was unable to do so because the station could not operate its licensed nighttime pattern due to an apparent internal system component failure. At that time, Mr. Stalnaker did not complete any further measurements because of the expectation that the nighttime pattern would soon be repaired and then both the daytime and nighttime measurements could be completed at one time. Although Mr. Stalnaker has stayed in contact with WVMi representatives since that date, the station remains unable to operate its nighttime pattern, and therefore, no nighttime measurements can be performed.¹

As a consequence, GGCB has been unable to complete a partial proof of performance on WVMi that would demonstrate that the station is operating in accordance with its license. Therefore, we respectfully request guidance from the Commission as to the proper course of

¹ GGCB has been reluctant to bring to the Commission's attention any problems concerning the operating parameters of WVMi; however, under the circumstances it has no other choice. As further confirmation of the problems confronting the operation of WVMi, attached hereto is a copy of an email dated August 7, 2001 from a technician working on WVMi to Mr. Stalnaker noting that the antenna monitor has been removed and is being repaired.

action. Since there is no indication when WVMI's nighttime operation will be in conformity with its license, will a partial proof on the daytime pattern be sufficient?

Removal of the Special Condition. GGCB also respectfully renews the request in its license application that the special condition relating to WVMI be removed. The merits of this request were not addressed in the Commission's September 5 letter.

As noted in the WQYZ license application, the Commission removed a similar condition that had been imposed on the construction permit (BMPFT-980729TE) for FM translator W210BK, Biloxi, Mississippi. Attached hereto is the portion of the license application (BLFT-19990415TB) for W210BK which addresses this issue. Except for the difference in the antenna size and location on the tower and the transmission line, it appears that the critical factors are the same - both stations are located on an existing tower that is approximately 2.5 km from the WVMI antenna system. Given the mass of the existing tower and equipment already mounted on it before the addition of WQYZ, the fact that the WQYZ transmission line is bonded to the tower and the fact that the tower owner has not been notified by WVMI that any adverse effects have been caused by the structure, it would seem appropriate to remove the special condition from the WQYZ license as was done in the case of W210BK. If the construction of the tower itself did not cause problems for WVMI, it seems reasonable that the addition of the WQYZ antenna and related equipment to the existing tower would not adversely affect WVMI.

Request for Program Test Authority. GGCB also respectfully requests that at the very least it be granted program test authority ("PTA") to operate with its full authorized facilities pending further action on the license application. Without some relief from the Commission, GGCB is unable to correct technical problems with WVMI, problems that apparently predated the WQYZ modifications. GGCB obviously and regrettably failed to comply with the pre-construction partial proof measurements on WVMI, and that oversight cannot realistically be corrected now. However, its failure to comply with the post-construction proof measurements on WVMI is beyond its control and rests with that station.

As noted in the Commission's September 5 letter, GGCB has filed a grantable license application except for the remaining issue of documenting the lack of an adverse impact on WVMI. That issue is related to what GGCB has erected on the tower, not the power at which WQYZ operates. Therefore, GGCB respectfully requests that the Commission grant it PTA to operate with its full authorized power pending further action on the license application. Please note that the former licensed transmitter site for WQYZ is scheduled to be dismantled by the tower owner so GGCB respectfully requests the authorization of full power PTA.

Declaration of H. Carr Stalnaker

I, H. Carr Stalnaker, am providing the following information to the Federal Communications Commission in connection with the pending license application for station WQYZ-FM, Ocean Springs, Mississippi. I reside at 608 S. Pine Street, Cabot, Arkansas. I am a retired broadcast engineer with 36 years experience. I hold a lifetime general radio telephone license with radar endorsement and Society of Broadcast Engineers certification level of Professional Broadcast Engineer.

In March of this year, I was retained by Mr. Larry Steelman to conduct field strength measurements on radio station WVMI-AM, Biloxi, Mississippi. My understanding of why I was hired was to determine if the installation of the WQYZ-FM antenna and transmission line on an existing tower had an adverse impact on the operation of WVMI. Station WVMI operates with different directional patterns day and night.

Specifically, on March 31, 2001, I conducted field strength measurements on the daytime pattern of WVMI. The measurements were taken with a properly calibrated Potomac FIM-41 field strength meter, SN 234. The results of those measurements are attached hereto.

The attached measurements show that the daytime pattern for WVMI, based on the monitoring points, was in tolerance except for the 61° radial where the FCC licensed maximum reading is 17.1 MV, while my reading was 21.5 MV. I was working with a WVMI engineer when these measurements were taken and he indicated to me that the 61° reading was never in tolerance as far as he was aware. This fact was confirmed by old WVMI maintenance logs that had been completed before WQYZ moved to the new tower. For example, also attached hereto is a WVMI log sheet dated April 20, 1997 showing a reading of 20.0 MV on the 61° radial. In my opinion, this indicates that the 61° monitoring point was out of tolerance approximately to the same degree even before the tower used by WQYZ was constructed and obviously before the WQYZ antenna and transmission line was attached to the tower.

On March 31, 2001, I also attempted to take field strength readings on the WVMI night time array. However, on that date, the antenna system failed to switch to the night time pattern. The engineers at WVMI told me that they would take the monitor point readings when the problem was corrected and the station was operating with the licensed night time pattern. I have maintained contact with personnel at WVMI since my visit on March 31. Most recently, I was advised that the station's antenna monitor had been sent out for repairs and they would not be able to determine if there were problems with the phasing unit or the antenna array until the monitor was returned. To my knowledge that has not happened, and the station is still unable to properly switch to the night time directional pattern, so I have been unable to complete monitor point readings on the WVMI night time array.

The foregoing information is submitted under penalty of perjury and is true and accurate to the best of my knowledge, information and belief.


H. Carr Stalnaker

October 4, 2001

WVMI Radio

Common point current:

| <u>Licensed current</u> | <u>Actual current</u> |
|-------------------------|-----------------------|
| 10.0A | 10.0 A at 9:10 AM |

Antenna monitor indications (day time pattern):

| <u>Tower No.</u> | <u>Phase (licensed)</u> | <u>Actual reading</u> | <u>Ratio (licensed)</u> | <u>Actual reading</u> |
|------------------|-------------------------|-----------------------|-------------------------|-----------------------|
| 2 (ref) | 00.0 deg | 00.0 deg | 100% (ref) | 100% |
| 1 | - 172.0 deg | - 171.0 deg | 52 | 53.5 |
| 3 | 37 deg | 37.3 deg | 94.0 | 94.5 |
| 4 | 173.0 deg | 174.0 deg | 54.0 | 54.0 |

Monitor point measurements:

| <u>Azimuth</u> | <u>Licensed maximum</u> | <u>Actual reading</u> | <u>Date</u> | <u>Time</u> |
|----------------|-------------------------|-----------------------|-------------|-------------|
| 61 deg | 17.1 MV | 21.5 MV | 3/31/01 | 9:50 AM |
| 134 deg | 13.6 MV | 9.6 MV | 3/31/01 | 10:10 AM |
| 252.5 deg | 87.0 MV | 52.0 MV | 3/31/01 | 10:40 AM |
| 334.5 deg | 19.4 MV | 9.8 MV | 3/31/01 | 10:55 AM |

All measurements made with a Potomac FIM-41 field strength meter, SN 234.



H. Carr Stalnaker

FIELD STRENGTH MEASUREMENT

*****+DAY PATTERN*****

DEGREE==MAX SIG==MIN SIG==DATE==TIME==

| | | | | | |
|-------|----------|-----|----|-----------|------|
| 61 | (17.1mv) | 200 | 4 | 20 APR 97 | 0745 |
| 134 | (13.6mv) | 160 | 14 | 4 | 1000 |
| 252.5 | (87.0mv) | 520 | 20 | 4 | 1620 |
| 334.5 | (19.4mv) | 110 | 6 | 26 APR 97 | 1036 |

50.3 MILES
+9.37

TOWER==PHASE RELATIONSHIP==CURRENT RATIO==

| | | | | |
|-----|----------|--------|---------|-------|
| # 2 | (00.0) | 00.0 | (100.0) | 100.0 |
| # 1 | (-172.0) | -172.0 | (52.0) | 52.0 |
| # 3 | (37.0) | 37.0 | (94.0) | 94.0 |
| # 4 | (173.0) | 173.0 | (54.0) | 54.0 |

*****NIGHT PATTERN*****

DEGREE==MAX SIG==MIN SIG==DATE==TIME==

| | | | | | |
|------|----------|-----|----|-----------|------|
| 20.5 | (3.0mv) | 3.6 | 4 | 21 APR 97 | 1636 |
| 61 | (2.2mv) | 20 | 15 | 4 | 1657 |
| 134 | (2.8mv) | 11 | 16 | 4 | 1727 |
| 159 | (6.13mv) | 3.7 | 16 | 4 | 1713 |
| 283 | (2.3mv) | 23 | 13 | 4 | 1754 |
| 304 | (3.2mv) | 3.8 | 15 | 21 APR 97 | 1800 |

+9.8 MILES

TOWER==PHASE RELATIONSHIP==CURRENT RATIO==

| | | | | |
|-----|----------|--------|---------|-------|
| # 6 | (00.0) | 00.0 | (100.0) | 100.0 |
| # 1 | (38.5) | 36.0 | (63.0) | 59.6 |
| # 3 | (38.3) | 38.7 | (58.6) | 57.7 |
| # 5 | (-145.6) | -145.8 | (97.5) | 97.5 |

() Reference values

8/7/01

H. Carr Stalnaker

From: "Joel Robertson" <joelmacr@datasync.com>
To: "H. Carr Stalnaker"
Sent: Tuesday, August 07, 2001 6:38 AM
Subject: WVMi Status

Carr,

I know it sounds like I am dragging my feet on WVMi, but I am doing the best I can. The latest status I can give you is I am still working on

it. Currently I have pulled the antenna monitor and it is now at Potomac

Instruments for repairs and calibration. During our troubleshooting of the antenna system, we discovered that the monitor was all messed up. I now have the transmitter fixed and it is operating at the correct power,

but I cannot tell if there is anything else wrong with the phasing unit or

the antenna system, until I get the monitor back. I called Potomac Instruments yesterday and it will be about another week or two before they will have the monitor back to me. As soon as I get it back, I will check things out and let you know the status of the phasing unit and the antennas. Hopefully, when I get the monitor back everything will indicate that everything is fine and we will be able to get the monitoring points read. I will let you know of any changes.

Joel

TO

Larry Steelman

FROM

Carr

8/9/01

ENGINEERING REPORT
Request to Delete Condition on
Construction Permit BMPFT-980729TE
For
W201BK Bhozi, MS
January, 1999

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MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

CERTIFICATION OF CONSULTANT

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data submitted in this report.

The allocation data utilized in this report was taken from the FCC Secondary Database and other data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of those data errors or omissions.

The report has been prepared by or under the direction of the undersigned, whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

E. Harold Munn, Jr. & Associates, Inc.

January 15, 1999

by Virgil M. Royer
Virgil M. Royer, Staff Engineer

by Wayne S. Reese
Wayne S. Reese, President

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(517) 278-7339

STATEMENT CONCERNING TRANSLATOR FACILITY
W201BK In Proximity to WVMI(AM)

The Commission has placed a condition on the construction permit (CP), BMPFT-980729TE, of FM translator station W201BK, Biloxi, Mississippi. The basis of this condition is the potential effect on an existing AM station due to the addition of the W201BK antenna and transmission line to an existing communications tower. The condition (1) states in part "Prior to the construction of the tower authorized herein, permittee shall notify AM Station(s) listed below....." Based on the information contained in this statement, it is believed that this condition should be dropped from the CP and the concurrently filed license application be granted.

The supporting tower for W201BK, is existing, the tower stands 91 meters in height and supports various land-mobile antenna at and near the top of the tower. The tower is 2.46 km (2,460 meters) from the antenna system of WVMI. WVMI operates fulltime on 570 kHz.

The WVMI tower radiators are 82.1 degrees in electrical height at the WVMI frequency of 570 kHz. In addition, they are top-loaded 12.9 degrees, for a total of 95 degrees. It is submitted that the addition of the W201BK antenna and transmission line has no effect on the operation of WVMI for the following reasons.

1). The W201BK antenna is a one-bay S.W.R. Model FMEC-1. The antenna is electrically bonded to the communications tower, and the elements protrude only about 0.6° electrically (at the WVMI frequency of 570 kHz) from the side of the tower.

2). The W201BK transmission line extends up the communications tower to a height of only 37 meters above ground. The line is Cablewave FLC12-50J, and is also electrically bonded to the tower structure. The vertical transmission line run of 37 meters is 25° or only 0.07λ at 570 kHz (WVMI). An electrical conductor of this length, bonded to the tower, would not be conducive to parasitic radiation beyond that of the existing structure.

3). The diameter of the transmission line is a very small percentage of the mass of the existing tower. The fact that the transmission line is bonded to the tower essentially makes it part of the structure electrically.

MUNN-REESE, INC.

Broadcast Engineering Consultants

Coldwater, MI 49036

STATEMENT CONCERNING TRANSLATOR FACILITY
W201BK In Proximity to WVMJ(AM)

4). The overall height or electrical characteristics of the existing structure is not changing with the installation of the translator antenna and feedline.

5). There was no observable change in the operation of WVMJ reported to the tower owner when said tower was constructed.

Based on the above considerations, the addition of the W201BK antenna and transmission line would produce no significant change in the potential for re-radiation of the existing tower supporting the various antennae. Therefore, it is requested that the condition on the W201BK construction permit, with respect to AM station WVMJ be removed.