

# *REQUEST FOR SPECIAL TEMPORARY AUTHORITY*

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AM BROADCAST STATION KCLN  
CLINTON, IOWA  
1390 KHZ  
FACILITY ID: 33055

WPW BROADCASTING, INC.

APRIL, 2014

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**4.7.2014**

## **REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

The following engineering statement and attached exhibits have been prepared for **WPW Broadcasting, Inc.** ("WPW"), licensee of AM broadcast station KCLN at Clinton, Iowa, and are in support of their request for special temporary authority to operate that facility with parameters at variance.<sup>1</sup>

Vehicular contact was made with one of the guy wires supporting tower #2 in the array. The contact with the guy wire resulted in the collapse of this tower. As a result of this damage, WPW is unable to operate KCLN according to the technical parameters specified in its license.<sup>2</sup>

The current authorization for KCLN specifies that the facility operate on 1390 kHz utilizing a two-tower directional antenna. KCLN is a class D facility with a nominal antenna input power during daytime hours of 1.0 kW. At night, the facility is authorized to operate with the same directional pattern, but at an antenna input power of 91 Watts.

Since tower #2 in the array is no longer standing, it is impossible at this time for WPW to operate KCLN in the authorized directional mode. As a result, WPW requests a special temporary authority to operate KCLN with the undamaged tower #1 as a non-directional facility until such time as the collapsed tower can be restored, and the facility returned to directional operation. WPW respectfully requests that the initial term of the special temporary authority be no less than 180 days in length. Restoration efforts are currently underway

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<sup>1</sup> The Facility ID for KCLN at Clinton, Iowa is 33055.

<sup>2</sup> Co-located FM station KMCN(FM) at Clinton, Iowa (Facility ID:33054) utilizes the undamaged tower #1 as the supporting structure for its transmitting antenna. The operation of KMCN(FM) is unaffected by the tower failure, and that facility will continue to operate in accordance with the terms of its license.

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Since KCLN is authorized to operate during daytime hours with a nominal power of 1.0 kW, WPW requests that it be granted special temporary authority to operate with a non-directional antenna input power of 250 Watts using tower #1 in the array. It should be noted that this configuration would not only cause KCLN to exceed its authorized monitor point limits, but also exceed the authorized inverse field along several azimuths.

Although the radiated field would exceed the authorized augmented standard pattern along several azimuths, this increase in radiation would not result in impermissible interference to adjacent facilities in the region. In fact, the temporary non-directional operation with an input power of 250 Watts would actually *reduce* the level of contour overlap with other facilities in the region. Exhibit E-1 is a map depicting the daytime allocation situation for KCLN based on the licensed facilities and M-3 ground conductivities for all relevant facilities. This study is tabulated in the table following Exhibit E-1. These two exhibits illustrate the current allocation/interference situation for the facility, including the amount of overlap area.

Exhibit E-3 illustrates the allocation situation that would result from the use of the single tower with an antenna input power of 0.25 kW. For KCLN, the dashed contours denoted those resulting from the licensed facility, while the solid contours denote the requested STA facilities. As demonstrated in this map, and the subsequent table, the requested technical parameters indeed reduce the level of contour overlap.

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It should be noted that a strict adherence to the provisions of Section 73.1680(b)(1) requiring that the radiated field in any direction would result in a situation where the predicted 5 mV/m service contour would no longer encompass of Clinton. Exhibit E-5 compares the daytime 5.0 mV/m service contours resulting from the licensed facilities, the STA facilities, and the facilities that would limit the inverse field to 68.2 mV/m at one kilometer. It is respectfully submitted that it is in the public interest to maintain the best possible signal level over the community of license without interfering with other facilities. As a result, a waiver, if necessary, of the above referenced section of the Commission's Rules is requested.

During nighttime hours, it is proposed that the facility be permitted to operate with an antenna input power of 35 Watts, rather than the 23 Watts that would result from reducing the facility to quarter-power. A study of the nighttime allocation situation for KCLN indicates that at this power level, KCLN would not increase its existing RSS limit to WGRB at Chicago, Illinois.

Following the reconstruction of the failed tower, the array will be adjusted as necessary to ensure compliance with the terms of the current authorization. As part of the reconstructive process, WPW will perform a partial proof of performance on the array. The results of this partial proof will be filed with the Commission as part of an application for direct measurement of power.

The special temporary authority requested would not constitute a significant environmental impact, and is exempt from environmental processing. The temporary facilities would utilize the remaining tower in the array. No changes to this tower are proposed. The tower is currently

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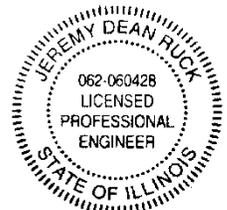
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fenced appropriately per the terms of its license. The requisite fencing will be maintained during cleanup and restoration efforts.

WPW will coordinate with all other users of the site to ensure that workers and other personnel having access to the site are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Such coordination will include, but is not necessarily limited to, a reduction in transmitter power or cessation of operation.

The preceding statement has been prepared by me, or under my direction, and is true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2015

Jeremy D. Ruck, PE  
April 7, 2014

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KCLN  
 Freq: 1390 kHz  
 Class: D  
 Latitude: 41-54-34 N  
 Longitude: 090-13-28 W  
 Power: 1 kW  
 RMS: 307.87 mV/m @1km  
 # Towers: 2  
 # Augs: 9

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- Causes
- Receives
- No Ix

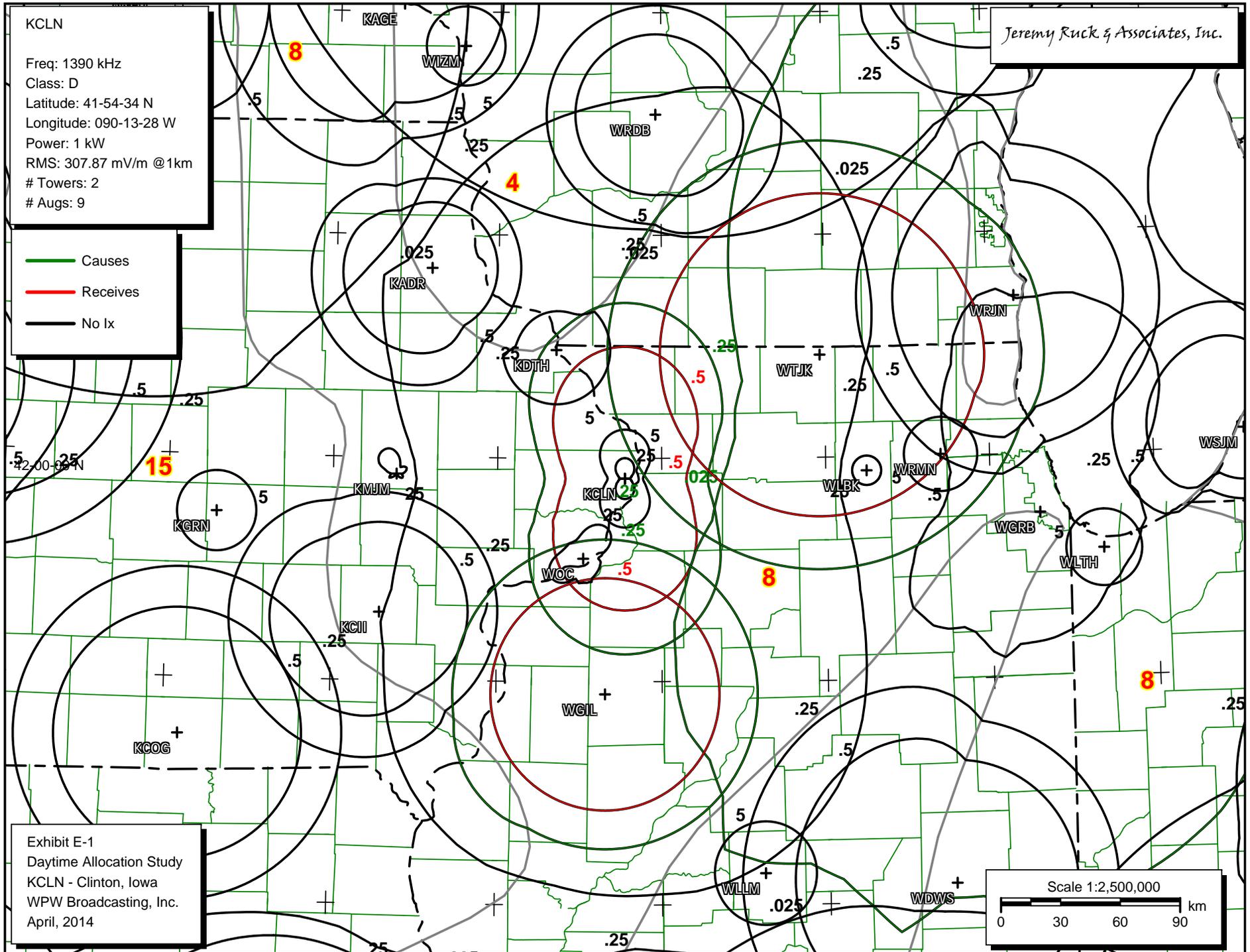
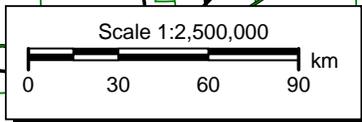


Exhibit E-1  
 Daytime Allocation Study  
 KCLN - Clinton, Iowa  
 WPW Broadcasting, Inc.  
 April, 2014





<b>Call</b>	<b>Freq</b>	<b>City</b>	<b>ST</b>	<b>Dist</b>	<b>Azi</b>	<b>In</b>	<b>Out</b>
KJAM	1390	MADISON	SD	612.8	290.0	353.08	418.34
KFFK	1390	ROGERS	AR	702.2	208.0	415.25	432.96
WTJS	1390	JACKSON	TN	705.7	170.6	459.38	445.78
WBLL	1390	GRANDVIEW HE	OH	638.3	111.4	384.08	454.68
WBLL	1390	GRANDVIEW HE	OH	638.3	111.4	406.27	464.19
KNCK	1390	CONCORDIA	KS	681.5	245.2	435.88	491.00
WANY	1390	ALBANY	KY	725.1	144.5	542.24	508.40
WMPO	1390	MIDDLEPORT-P	OH	762.8	117.6	566.86	596.31

KCLN  
Freq: 1390 kHz  
Class: D  
Latitude: 41-54-34 N  
Longitude: 090-13-28 W  
Power: 0.25 kW  
RMS: 307.87 mV/m @1km  
# Towers: 1  
# Augs: 0

— Causes  
— Receives  
— No Ix

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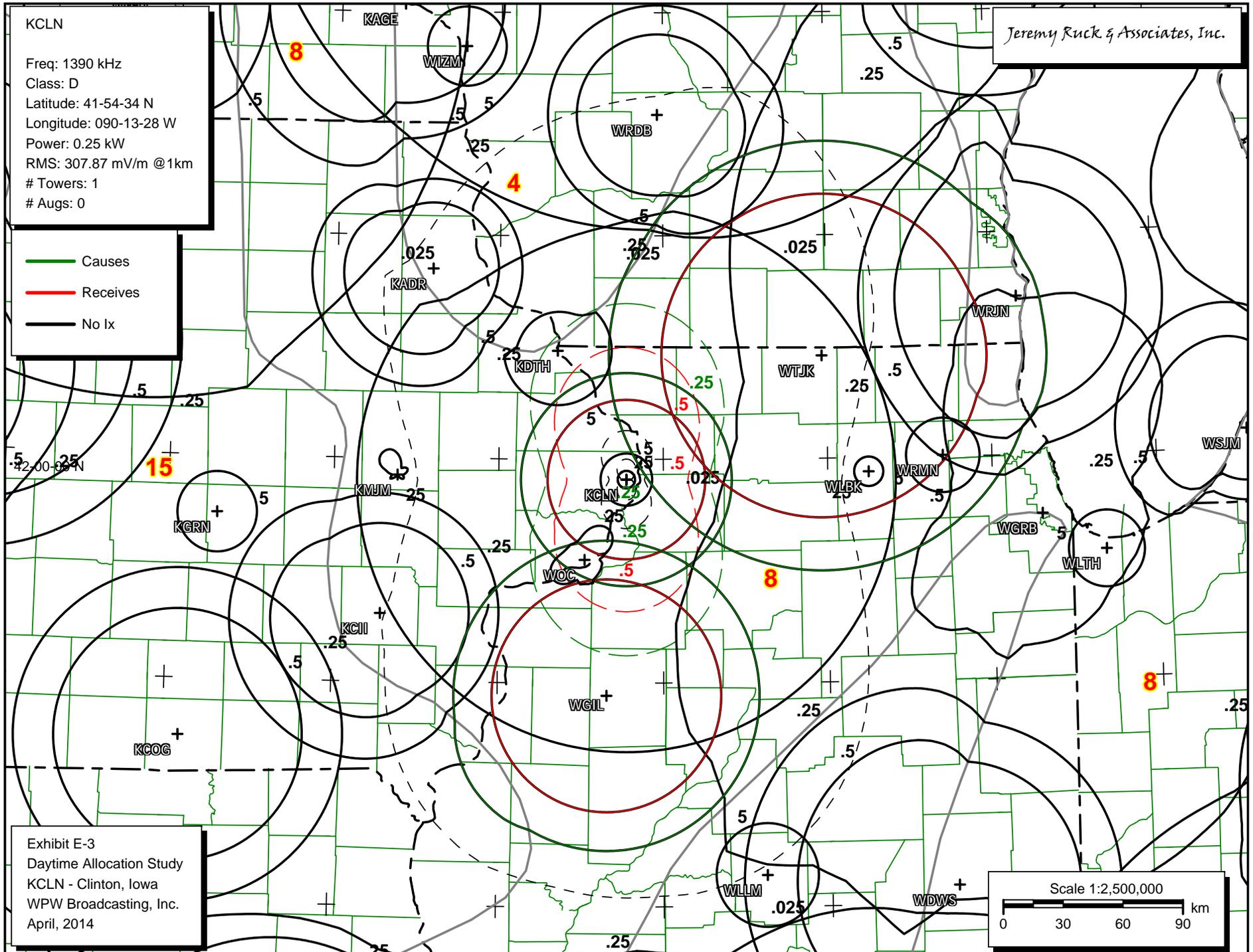
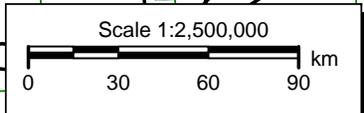


Exhibit E-3  
Daytime Allocation Study  
KCLN - Clinton, Iowa  
WPW Broadcasting, Inc.  
April, 2014





<b>Call</b>	<b>Freq</b>	<b>City</b>	<b>ST</b>	<b>Dist</b>	<b>Azi</b>	<b>In</b>	<b>Out</b>
KNCK	1390	CONCORDIA	KS	681.5	245.2	431.83	478.44
KFFK	1390	ROGERS	AR	702.2	208.0	433.79	492.34
WTJS	1390	JACKSON	TN	705.7	170.6	484.55	518.90
WANY	1390	ALBANY	KY	725.1	144.5	556.55	554.19
WMPO	1390	MIDDLEPORT-P	OH	762.8	117.6	564.34	588.53

- Licensed 5.0 mV/m Daytime Contour
- STA 5.0 mV/m Daytime Contour
- Inverse Field Limited 5.0 mV/m Daytime Contour

*Jeremy Ruck & Associates, Inc.*

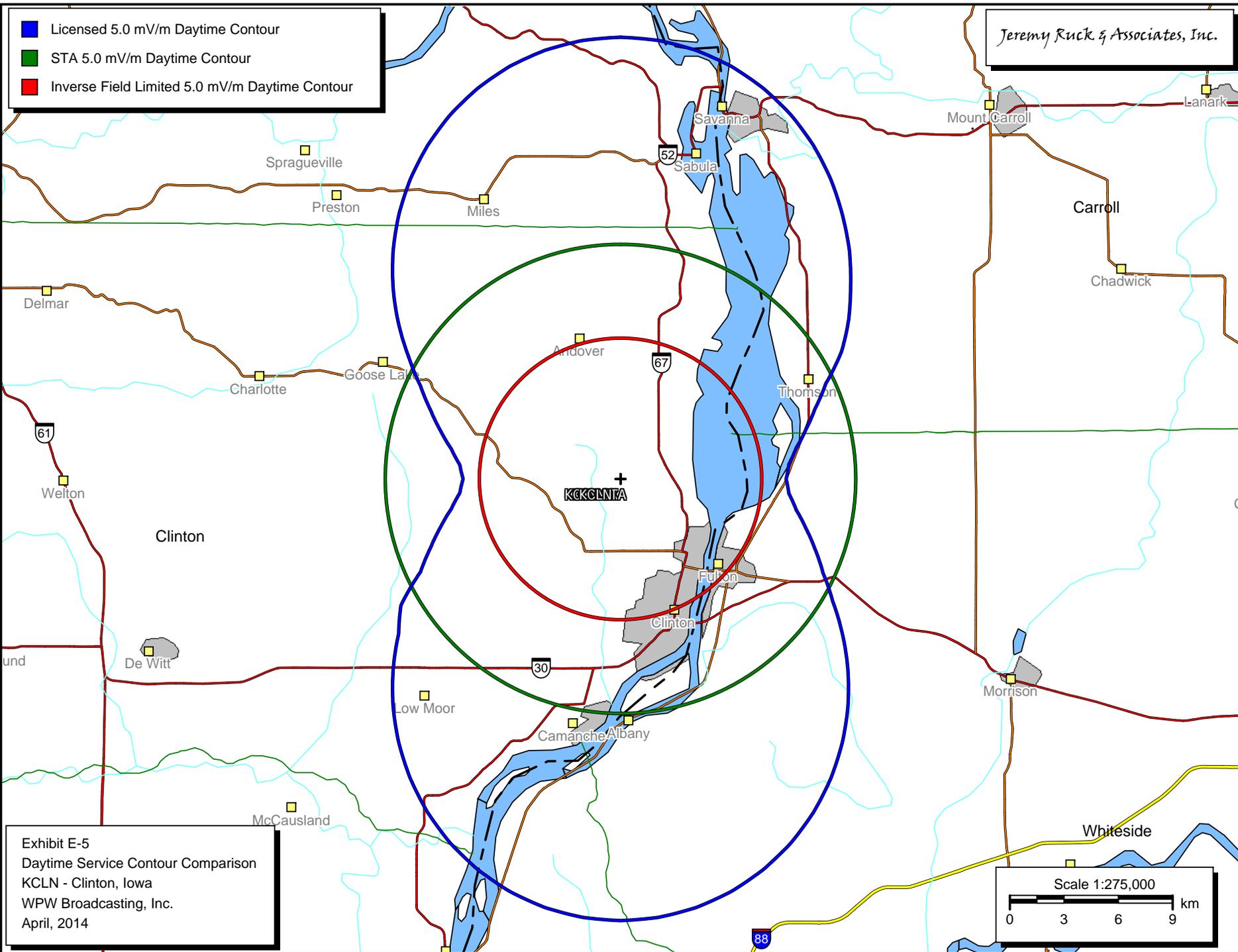


Exhibit E-5  
 Daytime Service Contour Comparison  
 KCLN - Clinton, Iowa  
 WPW Broadcasting, Inc.  
 April, 2014

