

Dayton Broadcast Engineering

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73.1692 (c), (d) Compliance Statement

I, Delner J. Dayton, Technical Consultant for the licensee, have performed pre- and post-construction field measurements for WHRC-LP. The measurements were performed to comply with FCC Rules and Regulations 73.1692 (c), (d). This insures the WHRC-LP tower is not affecting the signals of two nearby AM radio stations, WEAQ (1150 kHz, 5kW Non-Directional Daytime) and WOGO (2.5 kW Directional Day and .5 kW Directional Nighttime). Measurements proved both WOGO's directional patterns and WEAQ's non-directional pattern are undisturbed from the "pre-construction" status.

Monitor points were checked and radial measurements performed prior to and following erection of the WHRC-LP FM tower. All pre and post testing show that all WOGO Monitor Points stayed within limits and the radials measured on both stations are reading normally after the tower was erected.

This was the anticipated result. Prior to construction, no absorption or re-radiation issues were anticipated based on the following information.

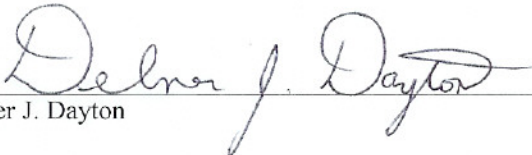
For WEAQ's frequency (1150 kHz), the WHRC-LP tower is only 40 degrees in electrical height, less than $1/8^{\text{th}}$ wavelength (slightly more than $1/10$ wave, $11/100^{\text{th}}$ to be more exact). The WHRC-LP FM tower is spaced .70 km from the WEAQ tower (FCC required ND separation to preclude measurement is .80 km). Being very short electrically, particularly at this distance from the WEAQ tower, it was very unlikely to absorb or reradiate, as has proven to be the case.

For WOGO's frequency (680 kHz), the WHRC-LP tower is even less likely to re-radiate, being only 23.7 degrees in electrical height (slightly more than $1/16^{\text{th}}$ wave, $66/1000^{\text{th}}$, more precisely). Though the WHRC-LP FM tower is spaced 1.25 km from WOGO (FCC required DA separation 3.2 km), a radiator of this height would likely not absorb or re-radiate even at a much closer distance. Again, this has proven to be the case.

Per an email discussion with Mr. Charles (Norm) Miller; since the before and after measurements indicate there is no change in either of the AM station's parameters, field readings, or other operation, and both the AM operations remain within licensed tolerances, there should be no need to file a Form 302-AM application for either AM station. A report with the pre and post construction field readings shall be kept on file at WHRC-LP with copies forwarded to WOGO, and WEAQ. This report shall also be made available to the commission upon request.

Qualifications

Mr. Dayton is qualified to perform and document these measurements. His qualifications include over 25 years of experience in broadcast engineering in the capacity of chief engineer, contract engineer, and technical consultant. He currently holds a valid lifetime "diploma" style General Radiotelephone License PG-16-8082 issued on January 2, 1985 originally issued as a First Class Radiotelephone license in 1976. He has been involved in the design, construction and maintenance of many broadcast facilities. He has performed many similar measurements, reports, and applications that have been submitted and accepted by the Federal Communications Commission.


Delner J. Dayton

12/22/06
Date