

ENGINEERING STATEMENT IN SUPPORT OF
WAIVER REQUEST - SECTION 73.24(I)

M-10 Broadcasting, Inc.
Pikesville, MD

Figure 11.0 is a detailed map exhibit showing an expanded view of the predicted 5 mV/m contour for the daytime facilities proposed in the attached application in relation to the boundaries of Pikesville. This contour was extracted from Table 10.1.3 in Exhibit 10.1 to this application and was projected using conductivity data extracted from the recently completed full proof of performance on this daytime directional antenna system at a power level of 21 kilowatts, as well as conductivity data obtained under a special field test authorization on test transmitter WW3XLG and additional allocation measurements conducted from this site. This measured conductivity data was supplemented with conductivity data extracted from FCC Figure M3 in areas where the measured conductivity values were not applicable.

As shown in this map exhibit, the predicted 5 mV/m contour for these proposed daytime facilities will not encompass all of Pikesville, as required by Section 73.24(i) of the FCC Rules. Pikesville encompasses a total land area of 31.0 square kilometers and has a total population of 29,123.¹ Studies were conducted using census block data and the centroid method to evaluate both the land area and population within Pikesville which would be predicted to receive 5 mV/m service from these proposed daytime facilities. This method uses proprietary computer software to determine if the geographic coordinates specified by the Census Bureau for a census block are located within the area being evaluated. The entire population and land area of any census block whose specified (or “centroid”) coordinates are found to be within the area being

¹All population data presented in this engineering statement is extracted from the 2000 U. S. Census.

evaluated are then attributed to this area. The computer software then sums the population and land area data for all census blocks attributed to the area being evaluated to determine the total area and population associated with the area under study.

These studies determined that the proposed WWLG daytime facilities will provide 5 mV/m service to 25.8 square kilometers, or 83.2% of the land area within the boundaries of Pikesville. They also determined that these proposed daytime facilities will provide 5 mV/m service to 24,446 persons within Pikesville, or 83.9% of the population of Pikesville. Thus, based on this information, these proposed daytime facilities substantially comply with the daytime principal community coverage requirements outlined in Section 73.24(i) of the FCC Rules.

Improving the proposed daytime principal community coverage of Pikesville from the presently authorized WWLG daytime transmitter site is not a possibility, as the proposed power of 50 kilowatts is the maximum permitted by the FCC Rules, which precludes increasing the proposed daytime power to provide improved principal community coverage to Pikesville. Achieving substantially improved principal community coverage by modifying the proposed directional pattern from this site is precluded by the daytime protection requirements to other stations. Thus, it appears that the principal community coverage of Pikesville resulting from the facilities proposed in the attached application represents the best which can be achieved without relocating the WWLG daytime transmitter site to a location closer to Pikesville.

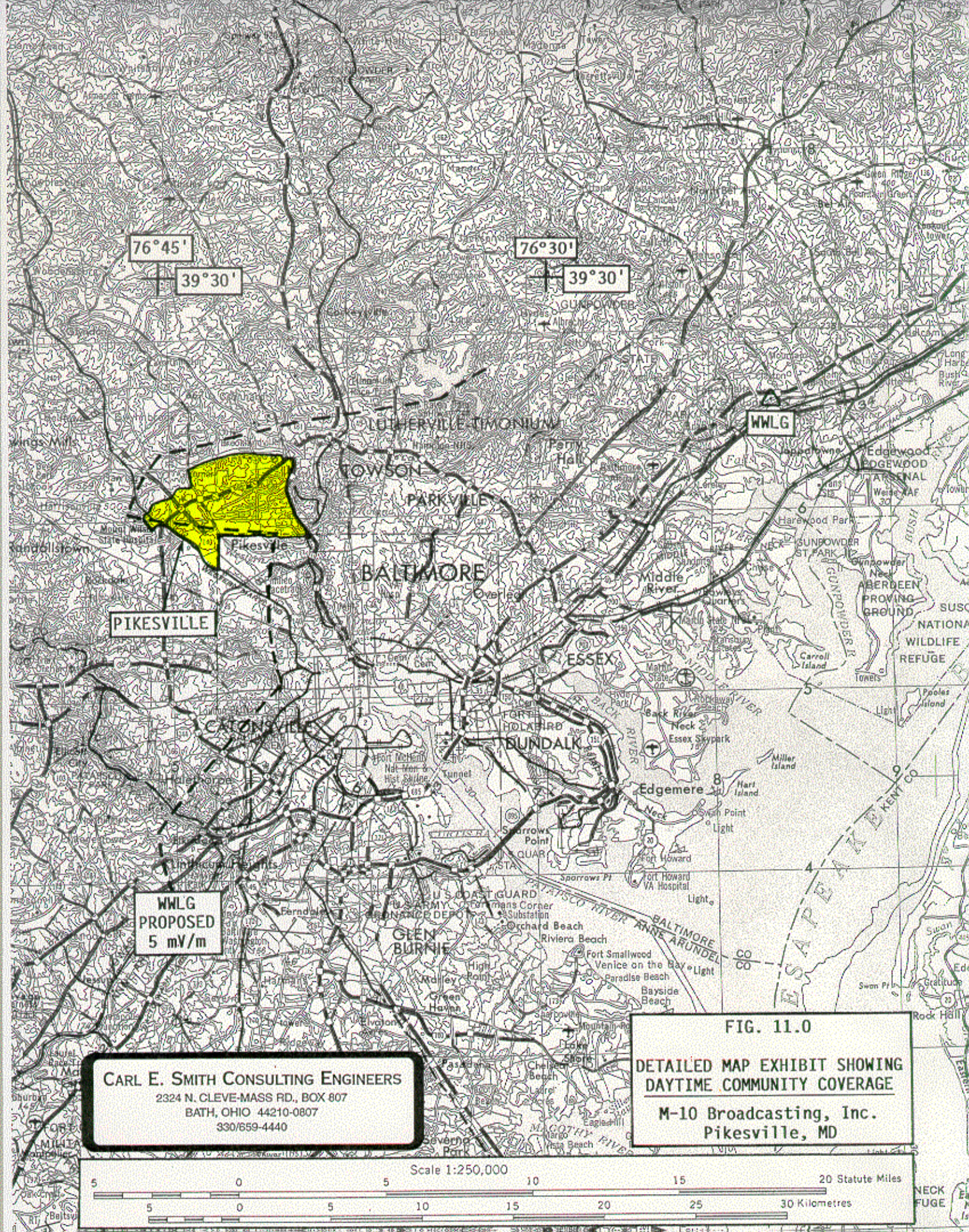
As outlined in the attached waiver request, WWLG's presently licensed daytime transmitter site had already become unavailable for use by the time the station was acquired by the present licensee and, as a result, WWLG was operating nondirectionally during daytime hours at a power of 250 watts from its licensed nighttime transmitter

site, pursuant to special temporary authority granted by the FCC. This 250 watt nondirectional daytime operation continued until July 24, 2002, when WWLG moved its operation to 1370 kHz, daytime only, from the transmitter site proposed in the attached application, pursuant to special temporary authority granted by the FCC to begin the process of implementing the 1370 kHz daytime only facilities authorized by construction permit BP-19990521AD.²

The attached waiver request documents the difficulties which were encountered by the licensee of WWLG in attempting to locate a suitable new daytime transmitter site to replace the long unavailable licensed WWLG daytime transmitter site, thus permitting the station to proceed with the process of restoring a normal licensed mode of daytime operation. During this site search process, the licensee of WWLG determined that there were no suitable sites available which would accommodate the required daytime antenna system while also complying with the daytime protection requirements to other stations and the applicable local zoning restrictions and also provide better daytime principal community coverage to the station's community of license. Thus, the proposed daytime principal community coverage of Pikesville appears to represent the best that can possibly be achieved by WWLG.

Based on the above information, a waiver of Section 73.24(i) of the FCC Rules is respectfully requested for the proposed WWLG daytime facilities, which, as noted above, will substantially comply with the coverage requirements outlined in this rule section.

²WWLG was granted program test authority for the facilities authorized by this construction permit on September 24, 2002.



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FIG. 11.0
DETAILED MAP EXHIBIT SHOWING
DAYTIME COMMUNITY COVERAGE
M-10 Broadcasting, Inc.
Pikesville, MD

