MINOR CHANGE APPLICATION
CONVERT FORMER MAIN TO AUXILIARY
ARSO RADIO CORPORATION
WPRM-FM RADIO STATION
CH 253B - 98.5 MHZ - 10.0 KW
SAN JUAN, PUERTO RICO
March 2005

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Arso Radio Corporation ("Arso"), licensee of FM radio station WPRM-FM, Channel 253B, San Juan, Puerto Rico. Arso herein proposes to convert its former main facility for WPRM-FM into an auxiliary FM antenna system for the station, for use when the main system is out of service for repairs or maintenance. This former main was decommissioned in 1979 following damage to the tower from Hurricane David. This former facility is located approximately 55 feet from the present WPRM-FM antenna system. The proposed auxiliary system will operate with an effective radiated power of 10.0 kilowatts.[1]

Since Arso is proposing an auxiliary antenna on an existing tower, the Federal Aviation Administration has not been apprised of this proposal. The tower is less than 200 feet above ground and does not require registration with the Commission.[2] Since this is a proposed auxiliary antenna system, no allocation review, community coverage issues, main studio location or interference issues are considered in this instant application.[3] Attached, as Exhibit A, is a map

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1) It is the intention of Arso to utilize this facility for HD radio operations once authorized.

2) Based on a review using the Tow-Air program.

3) There are no FM Intermediate Frequency ("IF") stations within 50 kilometers of this proposal.

which shows the proposed auxiliary facility's 60 dBu contour will not extend beyond that of the licensed WPRM-FM 60 dBu contour.[4]

The WPRM-FM auxiliary antenna is to be mounted on a relatively short tower, in close proximity to other high power FM stations. As such, the use of the worksheets associated with FCC Form 301 could not be used to certify compliance with the Commissions radio frequency radiation limits. Therefore, a study has been undertaken which shows the proposed WPRM-FM auxiliary antenna system is in compliance with the radio frequency radiation rules (Exhibit B).

It is noted that WPRM-FM operates on Channel 253B at a location only 0.15 kilometer from VHF Channel 6 station WIPR-TV, San Juan, Puerto Rico. WPRM-FM and WIPR-TV have been at their respective sites since before the implementation of the required spacing distance rules between Channel 253 and Channel 6. The main WPRM-FM facility's 36 mV/m contour is wholly contained within the 36 mV/m contour of WIPR-TV. The auxiliary is located only a short distance (55.0 feet) from the main WPRM-FM antenna, and will operate with less power (the auxiliary 36 mV/m is also wholly contained within the WIPR-TV 36 mV/m contour). As such, it is not expected that WIPR-TV would be impacted as a result of the operations of the proposed WPRM-FM auxiliary system. All other data used to certify the information contained in the application has been forwarded to Arso and is available for submission to the Commission upon request.

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4) Arso has submitted a correction of coordinates application for WPRM-FM's main antenna system. The WPRM-FM auxiliary contour is wholly contained within the licensed and corrected WPRM-FM main 60 dBu contour.