

MINOR CHANGE APPLICATION
CONNOISSEUR MEDIA OF ERIE, LLC
WRKT RADIO STATION
CH 285B1 - 104.9 MHZ - 4.5 KW
NORTH EAST, PENNSYLVANIA
May 2011

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Connoisseur Media of Erie, LLC (“CME”), licensee of WRKT, Channel 265B1, North East, Pennsylvania. CME herein proposes to make minor changes in the licensed facilities of WRKT by relocating the station to another tower site, increasing effective radiated power, lowering height above average terrain and changing from Channel 265B1 to Channel 285B1.¹ Due to the proximity to the United States border with Canada, this requested channel change requires Canadian concurrence. Attached as Exhibit A is an allocation review indicating that Channel 285B1 at the proposed allocation site meets the Commission’s minimum distance separation requirements to all domestic facilities and allotments, and would meet the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service as a specially negotiated shortspaced allotment. It is noted that the WRKT facility will share an antenna with co-located station WRTS.

CME is proposing to locate the antenna system for the relocated WRKT on an existing tower. Therefore, the Federal Aviation Administration has not been apprised of this proposal.

1) The proposed change is to a non-adjacent channel, but there is no change in class or community of license proposed. Therefore, it is believed that this request is in compliance with the Commission’s rules.

The tower on which the antenna is to be located has been registered with the FCC and assigned Antenna Structure Registration Number 1026680. As indicated in Exhibit A, the allocation site for the proposed Channel 285B1 meets §73.207 of the rules to all other stations²; a Class B1 would provide a 70 dBu contour over all of North East, Pennsylvania; and the allocation site is suitable for tower construction, as there is already a tower located at the site.³ From the implementation site proposed in this instant application, Channel 285B1 does not meet the spacing requirements of §73.207 to two domestic facilities, as well as a minor shortage to one Canadian facility. Therefore, processing pursuant to §73.215 is requested. See Exhibit B for details.

The proposed WRKT facility will operate with an effective radiated power of 4.5 kilowatts on a fairly short tower with other FM stations. Therefore, the worksheets associated with FCC Form 301 could not be used to certify compliance with the radio frequency radiation limits at the base of the tower. A study has therefore been undertaken to show the proposed WRKT facility is compliant with the Commission's RF exposure guidelines. See Exhibit C for details.

All other necessary documentation used to certify the technical portion of FCC Form 301 has been forwarded to CME and is available to the Commission upon request.⁴

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- 2) This is based on the channel being a specially negotiated shortspaced allotment with Canada.
 - 3) The allocation reference site is the location of a tower registered under ASRN 1204287.
 - 4) The undersigned has evaluated only the radio frequency radiation exposure limits of this proposal. Further, all data regarding broadcast facilities was extracted from the CDBS database on the date of this application. We assume no liability for errors or omissions in that database that may be adverse to the requests contained herein.