



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN APPLICATION FOR
CONSTRUCTION PERMIT
WRMA(FM) - FORT LAUDERDALE, FLORIDA
CHANNEL 294C0, 100 kW ERP (DA-MAX), 300 M HAAT**

Licensee: WRMA Licensing, Inc.

I am a Radio Engineer in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by WRMA Licensing, Inc., licensee of FM broadcast station WRMA(FM), Fort Lauderdale, Florida, to prepare this statement, FCC Form 301 Section III-B and associated exhibits in support of an Application for Construction Permit. This application is contingent upon the grant of a concurrently filed application for a minor change at WZMQ(FM), Key Largo, Florida.

Radio station WRMA(FM) is presently licensed to operate on Channel 294C0 with an Effective Radiated Power (ERP) of 100 kW (DA-MAX) at an antenna Height Above Average Terrain (HAAT) of 300 meters. This application proposes processing under Section 73.215 of the FCC Rules. No change in the WRMA(FM) technical parameters are proposed herein.

CONTINGENT APPLICATION

Pursuant to Section 73.3517(e) of the FCC Rules, this application is contingently filed with a concurrently filed application for a minor change at WZMQ(FM), Key Largo, Florida. The WZMQ(FM) application requests a transmitter site change which creates a new 11.53 km short-spacing to WRMA(FM).

The instant application requests no technical facility change. Rather, the WRMA(FM) application requests only that the WRMA(FM) license be reclassified as a "Section 73.215 Authorization". The proposed administrative change for WRMA(FM) will allow the proposed WZMQ(FM) facility to protect WRMA(FM) to its actual service contours rather than maximum Class service contours in accordance with Section 73.215(b)(2)(iii) of the FCC Rules.

ALLOCATION CONSIDERATIONS

No transmitter site change is proposed herein. The WRMA(FM) transmitter site is fully-spaced to all current allocations, licensed broadcast facilities, outstanding construction permits, and pending applications with the exception of a 11.53 kilometer short-spacing to the WZMQ(FM) transmitter site proposed in the concurrently filed, WZMQ(FM) contingent application.

The WZMQ proposal satisfies the contour overlap provisions of Section 73.215(a) with respect to the "Section 73.215 Authorization" at WRMA (See Exhibit 1). However, the

proposed WZMQ(FM) transmitter site move creates a short-spacing to WRMA in excess of the minimum distance spacing requirements of Section 73.215(e) of the FCC Rules. A complete Section 73.215(a) overlap study and a request for waiver of the Section 73.215(e) minimum distance separation is contained in the WZMQ(FM) contingent application. If necessary, WRMA(FM) also requests the waiver of the Section 73.215(e) spacings, and, by reference, WRMA(FM) relies upon the justification for waiver submitted in the contingent WZMQ(FM) application.

TECHNICAL FACILITIES

The applicant proposes no change in the WRMA(FM) technical facility. The instant proposal requests only that the WRMA(FM) license be reclassified as a "Section 73.215 Authorization".

RADIOFREQUENCY IMPACT

No technical facility change is proposed herein. The transmitter sites for the following operating broadcast stations are either colocated with WRMA(FM) or are located within 315 meters of WRMA(FM):

- WKIS(FM), Boca Raton, FL - Channel 260C; 100.0 kW ERP; 300 meters radiation centerline height above ground level.

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- WBGG-FM, Fort Lauderdale, FL - Channel 290C0; 100.0 kW ERP; 312 meters radiation centerline height above ground level.
- WHFT-TV, Miami, FL - Channel 45+; 2570 kW (H), 308 meters radiation centerline height above ground level.
- WHFT-DT STA, Miami, FL - Channel 46; 3.7 kW (H), 163 meters radiation centerline height above ground level.

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The current guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations, as well as "uncontrolled" situations that apply in cases that affect the general public. The FCC's Office of Engineering and Technology (OET) Commission issued a technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997), to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The Bulletin contains updated and additional technical information for evaluating compliance with the current FCC policies and guidelines.

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The current FCC MPE level for “uncontrolled” environments is 0.2 milliwatt per centimeter squared or $200 \mu\text{W}/\text{cm}^2$ for FM facilities. The MPE level for FM facilities in a “controlled” environment is $1.0 \text{ mW}/\text{cm}^2$ ($1000 \mu\text{W}/\text{cm}^2$). For a worst-case RFR study, the stations listed above will be considered to be co-located with WRMA(FM).

Radio station WRMA(FM) is licensed to operate with an ERP of 100.0 kW at an antenna radiation centerline height of 300 meters above ground level. Considering a very conservative vertical relative field value of 0.5, WRMA(FM) is predicted to produce a maximum power density of $18.8 \mu\text{W}/\text{cm}^2$ which represents 9.4% of the FCC guideline value for “uncontrolled” environments.¹ Using the same calculation methods, WKIS(FM) is predicted to produce a power density of $18.8 \mu\text{W}/\text{cm}^2$ (9.4% of the FCC guideline value for “uncontrolled” environments) and WBGG-FM is predicted to produce a power density of $17.4 \mu\text{W}/\text{cm}^2$ which represents 8.7% of the FCC guideline value for “uncontrolled” environments.

Using a very conservative vertical relative field value of 0.3 for the television facilities listed above (OST Bulletin 65, Edition 97-01 suggests a vertical field value of 0.2), worst-case calculations, predict the two television facilities listed above will produce a total power density which amounts to 9.5% of the FCC guideline value for “uncontrolled” environments.

¹ According to antenna manufacturers’ vertical plane radiation patterns, no full-wavelength spaced transmitting antenna (from a 2-bay antenna through a 12-bay antenna) has a vertical relative field value greater than 0.5 toward ground level in the vicinity of the tower base.

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The cumulative power density of all the stations considered above represents only 37.0% of the FCC guideline value "uncontrolled" environments. Because this value is less than 100%, the multiple use site is in compliance with the Commission's radiofrequency radiation (RFR) guidelines for uncontrolled environments.


OCCUPATIONAL SAFETY

Based on the calculations discussed above, the cumulative power density at the multiple use site represents only 7.4% of the FCC guideline value in a "controlled" or occupational RFR environment. Radio station WRMA(FM) remains committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

SUMMARY

This statement, FCC Form 301, Section III-B, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: March 31, 2004



William J. Getz