

Diversified Communications Systems
9139 Route 18, Cranesville, PA 16410
814-756-3053

ENGINEERING STATEMENT OF RICHARD C. POGSON, CSRE
Prepared for: Pembroke Pines Elmira, Limited
Regarding: W230BB Application For Translator License

The Applicant, Pembroke Pines Elmira, Limited is applying for a translator license to cover Construction Permit No. BMPFT-20061129ACC. The construction permit issued includes a special operating condition or restriction, paragraph 3, as follows:

“If the antenna is mounted on an existing tower that is base-insulated or detuned at the frequency of AM stations WELM (1410 khz) and WEHH (1600 khz), the applicant shall notify the AM station. If necessary, the AM station may determine operating power by a method described in Section 73.51(a) (1) or (d), and/or request temporary authority from the Commission in Washington, D.C. to operate with parameters at variance in order to maintain monitoring point field strengths within authorized limits”.

The condition continues, “ Permittee shall be responsible for readjustment and continued maintenance of any detuning apparatus necessary to prevent adverse effects upon the radiation pattern of the AM station. Both before and after the installation of the antenna and transmission line on the tower, a partial proof of performance, as defined by Section 73.154(a) of the Commission’s rules, shall be conducted to establish that the AM array has not been adversely affected. The results of the partial proofs shall be submitted to the Commission with the application for license to cover this permit”.

In evaluating compliance with the above stated special operating condition the following factors were considered:

The existing tower (ASRN# 1226774) that the translator antenna is mounted on is owned by the applicant, Pembroke Pines Elmira, Limited. Pembroke Pines is also the licensee of AM stations WELM and WEHH. Prior to the translator antenna installation the AM stations requested and were granted temporary authority to operate with parameters at variance. The change in operating parameters has since been determined to be caused by re-radiation after construction of the above-referenced tower.

Pembroke Pines has the necessary materials on-site for detuning at this time and is awaiting favorable weather conditions for installation of the equipment. Upon installation and adjustment of the detuning apparatus a partial proof will be conducted on each of the affected AM stations and the results submitted to the Commission. During the detuning process and subsequent measurements the translator antenna and transmission line will remain affixed to the tower.

In light of the above factors, it can be concluded that the operating parameters of AM stations WELM and WEHH have been affected by the actual construction of the tower and not the installation of the translator antenna. A required partial proof of performance on each of the stations will be conducted upon detuning the tower. In addition, the affected AM stations are licensed to the applicant, Pembroke Pines Elmira, Limited. Therefore the applicant should be exempt from the requirements of the special operating condition detailed in paragraph 3.

Respectfully Submitted By,
Richard C. Pogson CSRE