

Engineering Statement
In Support of an Amendment to an Application to
Change Daytime and Nighttime Power
WRSB – Brockport, NY
1600 kHz ▪ Facility ID No. 15767

The following Engineering Statement and associated exhibits have been prepared to accompany an Amendment to an Application for a Construction Permit to change the Daytime Facility and the Nighttime Facility of WRSB. Applicant is seeking facility modification to remediate overlap with WGGO and WAUB and believes that granting this application is in the Public's interest.

The Applicant proposes a modification of existing License File Number BL-19801113AA. The proposed modification involves changing the operating frequency by 10 kHz and nighttime and daytime parameters from DA-N to non-directional operation and reducing power to .005 kilowatts nighttime and .3 kilowatts daytime. In proposing this modification the applicant requests secondary night status.

Applicant proposes to utilize tower #2 of the current five-tower array. Towers #4 and #5 would be decommissioned and removed. Towers #1 and #3 would be detuned and preserved for future possible future nighttime usage. Applicant notes that the electrical degrees of the existing antenna system (91.7 degrees) will appear different than the proposed electrical degrees (92.3) due to the change in requested frequency.

A nighttime and daytime allocation study shows protection to all stations and international allotments operating on the co-channel and adjacent channel frequencies. Skywave interference for the proposed nighttime operation has been calculated and the proposed WRSB nighttime signal will not enter the 25% exclusion limit for any stations checked within 1,272KM.

The proposed facility will not enter the 50% RSS of any relevant Canadian stations or notifications, nor the 25% RSS of any protected domestic stations or cut-off applications as shown on the attached exhibit.

Co-Channel, first-adjacent, second-adjacent, and third-adjacent studies were performed for all potentially impacted radio facilities in the US and Canada. The proposed application will not cause or accept any prohibited overlap beyond what currently exists.

Canadian Concurrence is necessary for this application in that measured radials were used for WRSB. All Canadian conductivities utilized in this analysis were completed using values referenced on page 133 in the “AGREEMENT BETWEEN THE GOVERNMENT OF THE UNITED STATES OF AMERICA AND THE GOVERNMENT OF CANADA RELATING TO THE AM BROADCASTING SERVICE IN THE MEDIUM FREQUENCY BAND, OTTAWA 1984”. Manual entry of conductivity variables depicted in the governing maps is necessary in that possible errors have been noted in the electronic versions of conductivity from a critical portion of these maps in some software packages. Exhibit 17 shows the correct variables taken from the physical maps.

STATEMENT OF COMPLIANCE

The proposal is classified as a minor change according to 47 CFR 73.3571(a)(2). As a requested Class D station operating on one of the channels listed in 73.25(b), the proposal satisfies 47 CFR 73.21(a)(3) which permits daytime operation with a nominal power of not less than 0.25 kilowatt nor more than 50 kilowatts at any time.

The proposed facility complies with the engineering standards and assignment requirements of requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, and 73.1650.

CERTIFICATION

This amendment to the Engineering Report, relative to an application for a Construction Permit to change operating parameters, power level, and community of license for WRSB-AM, Brockport, NY has been prepared by the undersigned. It is submitted that this statement, the amendments contained within, and all supporting exhibits, comply with the Rules and Regulations of the Federal Communications Commission and all representations contained herein are true to the best of my knowledge.

A handwritten signature in black ink, appearing to read 'B. McGlynn', with a stylized, flowing script.

Brian P. McGlynn
Genesee Media Corporation Engineering
October 28, 2019