

APPLICATION FOR STATION LICENSE
MID-SOUTH PUBLIC COMMUNICATIONS FOUNDATION
WKNP RADIO STATION
CH 211C2 - 90.1 MHZ - 18.0 KW
JACKSON, TENNESSEE
December 2007

TECHNICAL STATEMENT

This Technical Statement was prepared on behalf of Mid-South Public Communications Foundation (“Mid-South”), licensee of radio station WKNP, Channel 211C2, Jackson, Tennessee. Mid-South holds an outstanding permit to re-construct the WKNP facility following the destruction of the licensed facility by a tornado (BPED-20050208AAB). This instant application seeks a license to cover the outstanding permit, thus restoring normal operation.¹ A calculation of the transmitter power output of the WKNP transmitter is attached as Exhibit A.

There are three operating conditions/restrictions on the WKNP permit. As the WKNP site is located within 3.2 kilometers of AM stations WTJS, 1390 kHz, Jackson, Tennessee and WDXI, 1310 kHz, Jackson, Tennessee², Mid-South was to take pre- and post construction partial proof measurements on each AM station’s facilities to show that neither of the stations was impacted by WKNP. As indicated in the attached Exhibit 9, the WKNP tower was destroyed by a tornado. The structure on which WKNP was located, which also supported the antenna system

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- 1) WKNP is operating under Special Temporary Authority.
 - 2) WTJS is located 0.1 kilometer from the WKNP tower. WDXI is located 2.1 kilometers from the WKNP tower.

for station WOGY, Channel 281C1, Jackson, Tennessee, was replaced to enable restoration of service for both FM stations. This negated the ability to conduct pre-construction measurements for either AM station.³

Following the reconstruction of the tower, a series of de-tuning skirts were added to the tower to prevent the tower from having an impact on WTJS, which is located immediately adjacent to the FM tower. Attached as Exhibit B is a tower sketch and a schematic showing the de-tuning circuits in place on the FM tower.⁴ The de-tuning networks contain filters for both WTJS on 1390 kHz and WDXI on 1310 kHz. The skirts were adjusted to de-tune the FM tower of energy on 1390 kHz and 1310 kHz, based on a series of field measurements made around the site at which the FM tower is located. Adjustments were made to produce null conditions at each measurement point on each AM frequency.

After the installation and tuning of the skirts, a post reconstruction partial proof of performance on WTJS was conducted. The measurements, which are attached hereto as Exhibit C, show that WTJS was not impacted by the re-building of the tower or the attachment of the WKNP antenna and WOGY antenna systems on the tower, and is operating within licensed values.⁵

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- 3) Mid-South is only a tenant on the tower. The tower owner is the licensee of WOGY. It is noted that the former licensee of WOGY and owner of the tower was Clear Channel.
 - 4) This data was taken from the WOGY application for license, BLH-20070815AAP, which was granted November 29, 2007.
 - 5) See note 4 supra.

An attempt was made by the representatives of WOGY and WKNP to take post-construction measurements on WDXI. WKNP's representative met with the WDXI personnel in early October and again in late October, as noted in Exhibit 9, attached hereto. The WKNP representative, in conjunction with a party from WDXI, determined that WDXI was not capable of monitoring the nighttime directional antenna system for WDXI due to the failure of the antenna monitor and damage to at least one of the monitor sample lines. Further, there are several other towers in the vicinity of the WDXI array that have malfunctioning de-tuning networks. As such, there is no way to determine if the WDXI array is operating properly at its transmitter site, due to the failure of the monitor. Therefore, since the operating state of the system cannot be determined, no meaningful field measurements (partial proof) could be conducted. As WDXI is not operating with its licensed nighttime parameters, Mid-South respectfully requests that Condition #1, with respect to WDXI, be removed.

The second condition on the WKNP permit states that should Mid-South be notified by the Commission of harmful interference being caused by its facility, that Mid-South shall reduce power to the point where no interference will result, or cease operation (FAA interference condition). This condition will automatically expire after one year of interference free operation. Mid-South acknowledges this condition and will comply.

The remaining condition states that Mid-South will reduce the power of WKNP or cease operation, as needed, to insure that persons with access to the tower will not be exposed to radio frequency radiation levels in excess of the Commission's guidelines. Mid-South will comply with this requirement.

Based on the foregoing, it is believed that the WKNP facility is in compliance with the Commission's rules and that all conditions have been met, with the exception of the measurement conditions for WDXI, as discussed above.