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APPLICATION OF CONCORD MEDIA GROUP, INC.  
CONSTRUCTION PERMIT TO CHANGE TRANSMITTER SITE  
RADIO STATION KWAM  
990 KHZ, 0.33 KW, 10.0 KW-LS, DA-2  
MEMPHIS, TENNESSEE  
SEPTEMBER, 2001

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FCC FORM 301

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AMENDED: 20020104

AMENDMENT TO  
ENGINEERING STATEMENT IN SUPPORT OF APPLICATION  
FOR CONSTRUCTION PERMIT TO CHANGE TRANSMITTER SITE  
CONCORD MEDIA GROUP, INC.  
RADIO STATION KWAM  
MEMPHIS, TENNESSEE  
MINOR CHANGE  
JANUARY, 2002

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INTRODUCTION

This Firm has been retained by Concord Media Group, Inc. to prepare this Engineering Statement in support of its application to relocate the transmitter site of Station KWAM, Memphis, Tennessee to the present site of Station WREC, Memphis, Tennessee. Under present policies of the Commission, this application represents a Minor Change in the station's operations.

This amendment is in response to an e-mail message to the undersigned from Son Nguyen of the AM Branch dated December 13, 2001 at 2:01 PM.

This Engineering Statement will demonstrate compliance with all applicable Rules and Policies of the Federal Communications Commission.

CONTENTS OF AMENDMENT

This amendment changes the nighttime one ohm loss RMS from the previously reported 196.64 mV/m to 196.15 mV/m as requested by Staff.

This amendment also supplies the critical hours data which was inadvertently omitted from the original filing.

It should be noted that recently released downloadable copies of the AM database have omitted the third tower used in the daytime array.

No changes have been made in the daytime or nighttime arrays other than the nighttime RMS.

The following exhibits are supplied:

- E1-0 Directional Antenna Specifications Amended: 20020104
- E1-13 Tabulation of Critical Hours Radiation
- E1-14 Tabulation of Permissible & Actual Radiation toward the Canadian Border
- E1-15 Map Showing Canadian Border Points
- E1-16 Plot of Critical Hours Standard Pattern
- E1-17 Map Showing Critical Hours 5.0 mV/m Contour

With the exception of Exhibit E1-0, all exhibits are in addition to those all previously supplied. Exhibit E1-0 Amended 20020104 replaces the original exhibit.

DISCUSSION

Appendix 8 to Annex 2 of the US/Canadian AM Treaty dated 1984 specifies the method of calculation of maximum permissible radiation during the critical hours period beginning at local sunrise and ending one and one-half hours after sunrise at the geographic midpoint between the transmitting antenna of the Class B or C station and that of the Class A station. The treaty also requires operation from one and one-half hours prior to sunset at the midpoint until local sunset at the transmitting antenna site of Class B or C station.

During periods of critical hours operation, the maximum permissible radiation is determined by the formula  $F = 0.9D - 290$  mV/m at the vertical angle determined from Figure 2 of Annex 2. For the instant case, the range of angles is from  $1^\circ$  through  $4^\circ$ . Exhibit E1-14 is a detailed study of the permissible and maximum radiated fields toward the relevant points along the Canadian Border where the 100 uV/m of Station CBW, Winnipeg, Manitoba intersects the border. These points are shown

graphically in Exhibit E1-15. The standard radiation pattern tabulation for critical hours appears herein as Exhibit E1-13. A graphical plot of the Cirtical Hours Standard Pattern appears herein as Exhibit E1-16. The resulting 5.0 mV/m coverage appears in the map of exhibit E1-16. The contour covers more than 95 percent of the current city limits of Memphis. Should a waiver be required, one is respectfully requested.

All calculations were made in accordance with methods specified by the Rules of the Commission.

### CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Concord Media Group, Inc. prepare this Engineering Exhibit

I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.



J. S. Sellmeyer, P. E.

January 4, 2002

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