

AMENDMENT

Trignition Media LLC, licensee of WRYM, FI 26314, New Britain, Connecticut, hereby amends its pending application BP-20220630AAD with the attached material.



David Webster

10/28/22
DATE

ENGINEERING REPORT COVERING
OPPOSITION TO THIRD INFORMAL OBJECTION
TRIGNITION MEDIA, LLC
FOR WRYM 840 KILOHERTZ
NEW BRITAIN, CONNECTICUT

OCTOBER 2022

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SUMMARY

The engineering exhibit of which this statement is part was prepared on behalf of Trignition Media, LLC., hereinafter referred to as “Trignition”, in support of an opposition to a third informal objection filed by Carter Broadcasting Corporation, hereinafter referred to as “Carter” to construction permit application BP-20220630AAD for AM station WRYM New Britain, Connecticut. Trignition is the licensee of WRYM and Carter is the licensee of WCRN. WRYM is licensed to operate as a Class D station on a frequency of 840 kilohertz on an unlimited time basis utilizing a non-directional antenna system with power of 1 kilowatt daytime and a directional antenna with power of .125 kilowatts nighttime. WCRN operates as a Class B station on a frequency of 830 kilohertz with fulltime power of 50 kilowatts utilizing a dual mode directional antenna system. Trignition is requesting a daytime power increase, converting to daytime directional operating and broadcasting with a dual mode directional antenna system. Requested power is 3.5 kilowatts for the daytime proposal. No changes to the nighttime operation are proposed.

CARTER THIRD OBJECTION

Trignition believes their first and second oppositions resolved the overlap issue raised in the Carter objection. However, Carter's third objection states the second CRN opposition still produces a very small overlap area with WCRN. Trignition has reviewed Carter's third objection and believes the small overlap area in question is produced by small differences in contour distances that are software related.

Rather than debate the software issue and to expeditiously settle the overlap question, Trignition will amend its application to reduce daytime power to 3.2 kilowatts. A revised polar plot with horizontal radiation tabulations is included with this report along with an amended Form 301. No other changes are proposed. The amendment will eliminate the overlap claimed by Carter. Therefore, the Trignition application should be granted.

DECLARATION

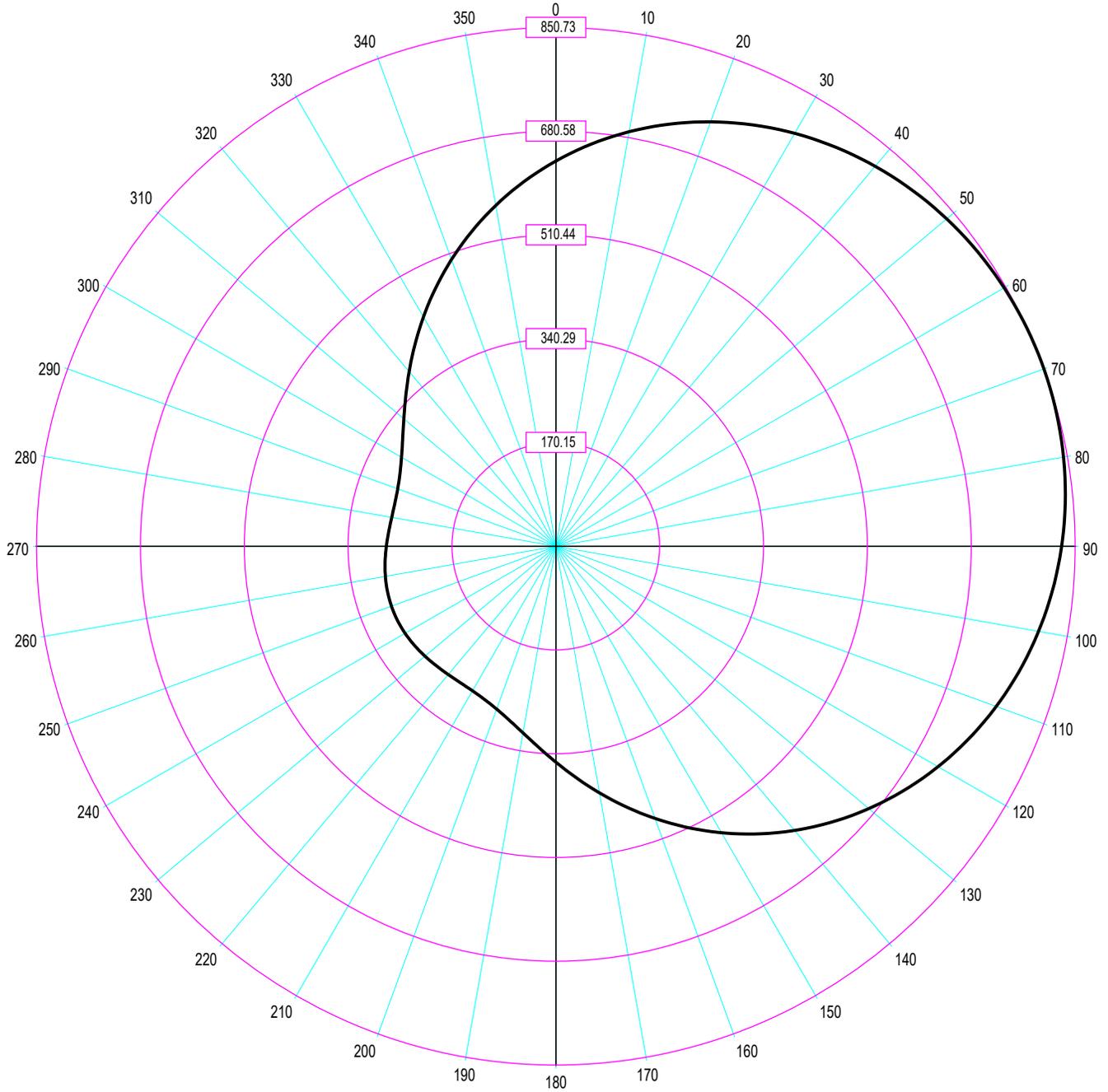
The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Freehold, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

Charles A. Hecht

Charles A. Hecht
Charles A. Hecht & Associates, Inc.
19 Mackenzie Court
Freehold, New Jersey 07728
(732) 577-0711
October 28, 2022

REVISED DAYTIME POLAR PLOT



OCTOBER 2022

Callsign	: WRYM	T#	Field	Phase	Spacing	Orientation	Height	Top Load	Tower Ref
Frequency	: 840 kHz	1	0.600	134.9	0.0	0.0	61.0	0.0	0
Power	: 3.200 kw	2	1.000	0.0	54.7	68.1	77.5	0.0	0
ERSS	: 755.4 mV/m/km								
Theoret. Pattern RMS	: 540.1 mV/m/km								
Standard Pattern RMS	: 567.5 mV/m/km								
Modified Pattern RMS	:								
Latitude	: 41-41-10.0 N								
Longitude	: 72-43-47.0 W								
Number Augmentations	: 0								

Azim	Field [mV/m]
0.0	631.943
5.0	662.036
10.0	690.345
15.0	716.645
20.0	740.767
25.0	762.588
30.0	782.031
35.0	799.051
40.0	813.634
45.0	825.783
50.0	835.516
55.0	842.857
60.0	847.828
65.0	850.448
70.0	850.728
75.0	848.670
80.0	844.265
85.0	837.495
90.0	828.338
95.0	816.771
100.0	802.773
105.0	786.337
110.0	767.473
115.0	746.217
120.0	722.638
125.0	696.847
130.0	669.002
135.0	639.314
140.0	608.051
145.0	575.544
150.0	542.185
155.0	508.433
160.0	474.806
165.0	441.885
170.0	410.301
175.0	380.720
180.0	353.822
185.0	330.249
190.0	310.543
195.0	295.067

Azim	Field [mV/m]
200.0	283.915
205.0	276.876
210.0	273.436
215.0	272.863
220.0	274.318
225.0	276.961
230.0	280.041
235.0	282.937
240.0	285.179
245.0	286.453
250.0	286.593
255.0	285.582
260.0	283.549
265.0	280.773
270.0	277.686
275.0	274.874
280.0	273.060
285.0	273.068
290.0	275.746
295.0	281.865
300.0	291.999
305.0	306.435
310.0	325.149
315.0	347.839
320.0	373.995
325.0	402.993
330.0	434.158
335.0	466.818
340.0	500.330
345.0	534.102
350.0	567.599
355.0	600.349

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name	Relationship to Applicant (e.g., Consulting Engineer)	
Charles A. Hecht	Technical Consultant	
Signature	<i>Charles A. Hecht</i>	Date
		10/28/22
Mailing Address		
Charles A Hecht & Associates, Inc. 19 Mackenzie Court		
City	State or Country (if foreign address)	ZIP Code
Freehold	New Jersey	07728
Telephone Number (include area code)	E-Mail Address (if available)	
732 577-0711	hechtassoc@sprintmail.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III - A AM Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Frequency: 840 kHz
2. Class: A B C D
3. Hours of Operation: Unlimited Limited Daytime Share Time Specified Hours: _____

4. **Daytime Operation:** Yes No

a. Power: 3.2 kW

b. Antenna Location Coordinates: (NAD 27)

41 ° 41 ' 10 " N S Latitude
72 ° 43 ' 47 " E W Longitude

c. **Nondirectional:** Yes No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<p style="text-align: center;">Number</p> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - NIGHTTIME OPERATION

5. **Nighttime Operation:**

Yes No

a. Power: .125 kW

b. Antenna Location Coordinates: (NAD 27)

$\frac{41}{72}^{\circ}$ $\frac{41}{43}'$ $\frac{10}{47}''$ N S Latitude
 E W Longitude

c. **Nondirectional:**

Yes No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<p style="text-align: center;">_____ Number</p> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - NIGHTTIME OPERATION

d. Directional:

Yes No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 105.3 mV/m at 1 km

Standard RMS: 111.1 mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)	60.5	77.7		
Antenna structure registration	<hr/> <input type="checkbox"/> Number Notification filed with FAA <input checked="" type="checkbox"/> Not applicable	<u>1040394</u> <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	<hr/> <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	<hr/> <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	60.5	76.8		
Electrical height of radiator (degrees)	61.0	77.5		
Field ratio	.988	1		
Phase (degrees)	134.9	0		
Spacing (degrees)	0	54.7		
Tower orientation (degrees)	0	68.1		
Tower reference switch	0	0		
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

Yes No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth Span Augmentation radiation

TECH BOX - CRITICAL HOURS OPERATION

Yes No

6. Critical Hours Operation:

a. Power: _____ kW

b. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " N S Latitude
 _____ ° _____ ' _____ " E W Longitude

c. Nondirectional:

Yes No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<p style="text-align: center;">_____</p> <p style="text-align: center;">Number</p> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (meters)	
A	
B	
C	
D	

TECH BOX - CRITICAL HOURS OPERATION

d. Directional:

Yes No
 Exhibit No.

if "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Theoretical _____ mV/m at 1 km

Standard RMS: _____ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable	_____ <input type="checkbox"/> Number Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

Yes No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth Span Augmentation radiation

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

- 7. **Broadcast Facility.** The proposed facility complies with the engineering standards and assignment 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, 73.1650. **Exhibit Required.**
 Yes No See Explanation in Exhibit No.
Exhibit No. Comp. Eng.
- 8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).
 Yes No See Explanation in Exhibit No.
- 9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.
 Yes No See Explanation in Exhibit No.
- 10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.
 - Groundwave.**
 - a. 47 C.F.R. Section 73.37
Exhibit No. Comp. Eng.
 - Skywave.**
 - b. 47 C.F.R. Section 73.182.
Exhibit No.
 - Critical Hours.**
 - c. 47 C.F.R. Section 73.187.
Exhibit No.
- 11. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.**
By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.
 Yes No See Explanation in Exhibit No.
- 12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).
 Yes No N/A
Exhibit No.
An exhibit is required unless this question is not applicable.
- 13. **Dispositive Section 307(b) Preference**
 - a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?
 Yes No
 - b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.
 Yes No N/A
Exhibit No.
 - c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.
 Yes No
Exhibit No.