



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN APPLICATION FOR
CONSTRUCTION PERMIT
WFSH-FM - ATHENS, GEORGIA
CHANNEL 284C1, 24.0 kW ERP, 505 M HAAT
FACILITY ID: 56390**

Licensee: South Texas Broadcasting, Inc.

I am a Radio Engineer in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by South Texas Broadcasting, Inc., licensee of FM broadcast station WFSH-FM, Athens, Georgia, to prepare this statement, FCC Form 301 Section III-B and the associated exhibit in support of a minor change application for WFSH-FM. This application requests a 0.32 kilometer site relocation to a new tall tower. In addition to the slight transmitter site relocation, the applicant proposes an increase in antenna height and a corresponding reduction in effective radiated power to maintain a maximum Class C1 facility.

ALLOCATION CONSIDERATIONS

The transmitter site proposed herein is fully-spaced to all current allocations, licensed broadcast facilities, outstanding construction permits, and pending applications. As a result, the instant proposal satisfies the FCC's allocation considerations with respect to all pertinent cochannel and adjacent channel allotments, assignments and applications.

PREDICTED COVERAGE CONTOURS

The geographical coordinates and ground elevation at the proposed site were determined by a licensed surveyor. Average terrain data was obtained from a National Geophysical Data Center Thirty Second Point Topographic Database (TGP-0050). The height above average terrain as calculated from the transmitter site is 505 meters. The 3.16 mV/m (70 dBu) city-grade contour, calculated in accordance with the method described in Section 73.313 of the Rules utilizing the appropriate F(50,50) propagation curves from the Rules (Section 73.333, Figure 1), effective radiated power, and antenna height above average terrain as determined for each profile radial, completely encompasses the principal community to be served, as required by Section 73.315(a) of the Commission's Rules.

BLANKETING AND INTERMODULATION INTERFERENCE

There are no licensed FM or TV transmitters located within 10 kilometers of the proposed antenna location. In the event that blanketing interference occurs as a result of this proposal with any facilities which have not been identified, the applicant will take appropriate steps to minimize the interference within the blanketing contour.

In accordance with the Commission's January 2, 1991 decision (FCC 91-3, released January 14, 1991) regarding the application of WK LX, Inc., the applicant will exclude both mobile and battery-powered receivers from Receiver Induced Third Order Intermodulation and Blanketing Interference Resolution Requirements. In the event any type of intermodulation interference (including receiver induced) occurs with any other facilities which have not been identified, the applicant will take appropriate steps (i.e., install and maintain traps or filters) to minimize the interference in fixed receivers. The applicant will respond to complaints of blanketing interference for a period of one year in compliance with Section 73.318(b) of the Commission's Rules.

FAA NOTIFICATION AND FCC TOWER REGISTRATION

A Notice of Proposed Construction (FAA Form 7460-1) was filed with the FAA's Southern Regional Office on November 1, 2002. Once the FAA issues a Determination of No Hazard for the proposed tower structure, the tower will be promptly registered with the Federal Communications Commission.

ENVIRONMENTAL CONSIDERATIONS

RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The current guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations, as well as "uncontrolled" situations that apply in cases that affect the general public. The FCC's Office of Engineering and Technology (OET) Commission issued a technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997), to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The Bulletin contains updated and additional technical information for evaluating compliance with the current FCC policies and guidelines.

The current FCC MPE level for “uncontrolled” environments is 0.2 milliwatt per centimeter squared (mW/cm^2) or $200 \mu\text{W}/\text{cm}^2$ for FM facilities. The MPE level for FM facilities in a “controlled” environment is $1000 \mu\text{W}/\text{cm}^2$.

Based on a worst-case analysis, WFSH-FM is predicted to produce a maximum power density at two meters above ground level of $5.56 \mu\text{W}/\text{cm}^2$ which is only 2.78% of the FCC guideline value for “uncontrolled” environments.

OCCUPATIONAL SAFETY

Based on the calculations discussed above, WFSH-FM is predicted to produce a power density which is 0.556% of the FCC guideline value for “controlled” environments. The applicant will insure the protection of station personnel or tower contractors working in the vicinity of the proposed transmitting antenna. The applicant will reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

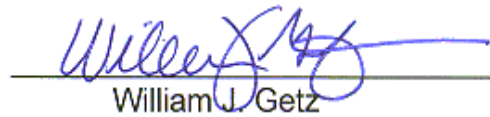
SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301,

STATEMENT OF WILLIAM J. GETZ
WFSH-FM - ATHENS, GEORGIA
PAGE 6

Section III-B, and the attached exhibit were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: November 1, 2002



William J. Getz