

IN 27510

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NINE QUEEN'S ROAD CENTRAL
MONO KONO

WRITER'S DIRECT DIAL NUMBER
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December 1, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Mass Media Services
P.O. Box 358190
Pittsburgh, PA 15251-5190

Re: REQUEST FOR PROGRAM TEST AUTHORITY
Filing of Application for License to Cover Construction
Permit
Construction Permit BP-961105AD As Modified
By BP-981009DC
Radio Station WTKZ(AM)
Allentown, Pennsylvania
The Holt Corporation of Pennsylvania, Inc.

Dear Ms. Salas:

On behalf of The Holt Corporation of Pennsylvania, Inc., licensee of Radio Station WTKZ(AM), Allentown, Pennsylvania, and holder of the above-referenced construction permit which authorizes directional facilities, we are herewith filing an original and two copies of an application on FCC Form 302 for license to cover construction permit and as a Request for Program Test Authority.

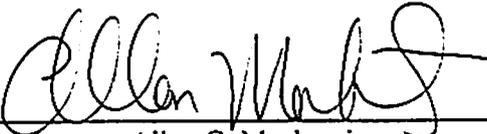
KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

Ms. Magalie Roman Salas
December 1, 1999
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Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

By: 
Allan G. Moskowitz

cc: James Crutchfield, FCC
Room 2-B423

FOR
FCC
USE
ONLY

FD 29510

FCC 302-AM
APPLICATION FOR AM
BROADCAST STATION LICENSE

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

19991201AAQ

SECTION I - APPLICANT FEE INFORMATION

1. PAYOR NAME (Last, First, Middle Initial)

The Holt Corporation of Pennsylvania, Inc.

MAILING ADDRESS (Line 1) (Maximum 35 characters)

961 Marcon Blvd.

MAILING ADDRESS (Line 2) (Maximum 35 characters)

Suite 400

CITY

Allentown

STATE OR COUNTRY (if foreign address)

PA

ZIP CODE

18103

TELEPHONE NUMBER (include area code)

610-264-4040

CALL LETTERS

WTKZ (AM)

OTHER FCC IDENTIFIER (If applicable)

2. A. Is a fee submitted with this application?

Yes No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1112).

Governmental Entity

Noncommercial educational licensee

Other (Please explain):

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)

FEE TYPE CODE		
M	M	R

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$ 475.00

FOR FCC USE ONLY

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)

FEE TYPE CODE		
M	O	R

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$ 545.00

FOR FCC USE ONLY

ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION

\$ 1,020.00

FOR FCC USE ONLY

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT The Holt Corporation of Pennsylvania, Inc.		
MAILING ADDRESS 961 Marcon Blvd., Suite 400		
CITY Allentown	STATE PA	ZIP CODE 18103

2. This application is for:

- Commercial Noncommercial
 AM Directional AM Non-Directional

Call letters WTKZ (AM)	Community of License Allentown, PA	Construction Permit File No BP-961105AD	Modification of Construction Permit File No(s) BP-981009DC	Expiration Date of Last Construction Permit 3/19/2000
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

Yes No

Exhibit No.

If No, explain in an Exhibit. Directional Antenna

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

Yes No

Exhibit No.

If No, state exceptions in an Exhibit.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction which would result in any statement or representation contained in the construction permit application to be now incorrect?

Yes No

Exhibit No.

If Yes, explain in an Exhibit.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

Yes No

Does not apply

Exhibit No.

If No, explain in an Exhibit.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

Yes No

Exhibit No.

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

Yes No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

Yes No

2. 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.

Name <i>Arthur H. Holt</i>	Signature <i>[Signature]</i>	
Title <i>President</i>	Date Nov. 30, 1999	Telephone Number <i>610-264-4040</i>

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 (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503)

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507

JD 27510

COMPLETE PROOF OF PERFORMANCE

WTKZ - 1320 kHz
ALLENTOWN, PA

CONTENTS

F.C.C. Form 302

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Nighttime Measurements

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Conductivity Curves

Family of Curves
Non-Directional Curves
Nighttime Curves

SECTION-III LICENSE APPLICATION ENGINEERING DATA

Name of Applicant

The Holt Corporation of Pennsylvania, Inc.

PURPOSE OF AUTHORIZATION APPLIED FOR (check one)



Station License



Direct Measurement of Power

1 Facilities authorized in construction permit

Call Sign	file No of Construction Permit (if applicable)	frequency (kHz)	Hours of Operation	Power in kilowatts	
				Night	Day
WTKZ	BP-961105AD	1320	U	0.195	0.750

2 Station location

State	City or Town
PA	Allentown

3 Transmitter location

State	County	City or Town	Street address (or other identification)
PA	Lehigh	Allentown	1125 Colorado Ave

4 Main studio location

State	County	City or Town	Street address (or other identification)
PA	Lehigh	Allentown	961 Marcon Blvd.

5 Remote control point location (specify only if authorized directional antennas)

State	County	City or Town	Street address (or other identifications)
PA	Lehigh	Allentown	961 Marcon Blvd.

6 Has type-approved stereo generating equipment been installed



Yes



No

7 Does the sampling system meet the requirements of 47 C.F. R Section 73. 68?



Yes



No



Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed

Exhibit No
Narrative

8. Operating constants:

RF common point or antenna current (In amperes without modulation for night system)	2.05	RF common point or antenna current (in amperes) without modulation for day system	3.75
Measured antenna or common point resistance (In ohms) at operating frequency		Measured antenna or common point reactance (in ohms at operating frequency)	
Night	50	Night	-9.0
Day	69	Day	+53

Antenna indications for directional operation

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratings		Antenna base currents	
	Night	Day	Night	Day	Night	Day
1	-164		83		3.6	
2	±0		100		4.4	

Manufacturer and type of antenna monitor

Potomac Instruments AM-19 (204)

9. Description of antenna system (if directional antenna is used, the information requested below should be given for each Element of the array. Use separate sheets if necessary.)

Type Radiator Vertical	Overall height in meters of radiator above base insulator, or above base, if grounded. (1&2) 61 meters	Overall height in meters above ground (Without obstruction lighting) (1&2) 61.5	Overall height in meters above ground (include obstruction lighting) (1&2) 62.5	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. Exhibit No. ---
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Excitation Series Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. Or single vertical radiator give tower location.

North Latitude	40 ° 35 ' 33 "	West Longitude	75 ° 28 ' 42 "
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

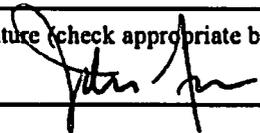
Exhibit No.
Narrative

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit

None

11. Give reasons for the change in antenna or common point resistance

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical

Name (Please Print or Type) John R. Furr	Signature (check appropriate box below) 
Address (Include ZIP Code) 8620 N. New Braunfels, Suite 305 San Antonio, TX 78217	Date November 11, 1999
	Telephone No. (Include Area Code) 210-828-4555

- Technical Director Registered Professional Engineer
 Chief Operator Technical Consultant
 Other (specify) Communications Consultant

NARRATIVE

PATTERN COMPLIANCE

The summary pages in this proof of performance demonstrates that all measured radials are within the Standard Pattern:

- The non-directional RMS was measured at 332.2 mV/m determined by sectoring.

- The night measured RMS is 143.1 mV/m/km determined by sectoring. The standard night RMS is 150.0 mV/m/km. Therefore the measured RMS is 95.5 percent of the Standard RMS and is above the required 85 percent.

ANALYSIS OF MEASUREMENTS

The non-directional (ND) readings were plotted on log-log paper and analyzed using Graph 16-A for 1250 to 1330 kHz. The Inverse Distance Field (IDF) at 1 km was determined by the location of the graph inverse line crossing the 1 km line after adjusted for best fit.

The DA to ND ratios of the points of the directional pattern were averaged to determine the radial average. The DA IDF was determined by the product of the radial average and the ND IDF. Verification of the IDF was done graphically also.

PARAMETERS

The non-directional antenna used for this proof was operated with other tower placed in a de-tuned (floating) position. The directional common-point was adjusted to 50 ohms and the antenna current maintained at 3.75 amps non-directional and 2.05 amps night.

SAMPLE SYSTEM

The sample system consists of Andrew LDF2-50 sample lines which are 3/8 inch foam filed coax with solid outer shielding. The sample lines were measured and cut to equal lengths. The RF sampling was done with Phasetek P600-203 transformers mounted between the ammeters and the antenna. The antenna monitor is a Potomac Instruments AM-19 (204), type approved monitor.

MEASUREMENT PROCEDURES

The radials were laid out on USGS 7.5 minute maps. Field personnel chose points and recorded the readings. At each point, the field meter was operated in accordance with the manufacturer's specifications, which included calibration. The persons who made the field strength measurements were either Kurt Gorman or others under his supervision. The results were sent for analysis.

SPECIAL CONDITIONS

- Measurements on WHOL have already been made and are on file with the FCC.
- Spurious Emissions measurements were made by Kurt Gorman after adjustment of the pass/reject filters. The emissions were found to be in compliance with FCC Rules. Table 11 is attached showing the measurements below 80 dB.
- Measurements for WKAP after the removal of the previous WTKZ towers has been made as is on file with the FCC.
- Fences have been erected at the towers with appropriate signs in compliance with OST Bulletin No. 65. Attached is photographs showing the fences in compliance.

TEST INSTRUMENTS

The antenna impedances were measured with a Delta OIB-3. The calibration was determined on site by using known standards.

The field intensity meters used were Potomac FIM-41 provided by Kurt Gorman, serial number 643, factory calibrated 18 June 1996.

I, John Furr, made no measurements or physical inspections but only report the information provided by the licensee in this proof. I believe the attached data and these statements to be true and correct.