

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ANTENNA SYSTEM DESCRIPTION**  
prepared for  
**Willow Farm, Inc.**  
WNSH Beverly, Massachusetts  
Facility Id 22798  
1570 kHz 50 kW ND-D U

**Nature of the Proposal**

Willow Farm, Inc. (“*Willow Farm*”) is the licensee of Standard Broadcast Radio Station WNSH, 1570 kHz, Beverly, Massachusetts (FCC File Number BL-20021217ACH, Facility Id 22798). WNSH is presently licensed to operate with 0.5 kW daytime utilizing a directional antenna pattern and with 0.085 kW non-directional at night. *Willow Farm* is also authorized to increase the WNSH daytime power to 50 kW using different directional antenna parameters with the existing daytime towers (see FCC File Number BP-20031114AGR).

The instant application proposes to modify the authorized daytime operation and specify a 50 kW non-directional operation using the same tower currently utilized for the nighttime operation. There will be no change in the tower location and no new tower construction is proposed herein. As a result of the change from a directional antenna system to a non-directional antenna system, the two unused towers will be demolished and removed from the site. No changes are proposed to the 0.085 kW licensed nighttime operation.

The licensee of standard broadcast station WPEP, 1570 kHz, Taunton, Massachusetts (Facility Id 61601) has entered into an agreement with *Willow Farm* which conditionally provides for the surrender of the WPEP license prior to the commencement of operation by *Willow Farm* of the facilities requested herein. Therefore, the instant application does not protect the licensed co-channel facilities of WPEP. In accordance with the guidelines set forth in MM Docket 89-46 and Section 73.3517(c) of the Rules, the instant application is a permissible “contingent application” that is being filed pursuant to an interference reduction arrangement. No “white” or “grey” areas will be created by the deletion of WPEP. It will also be shown that there is significant existing contour overlap and interference to WNSH from WPEP and vice versa. Deletion of WPEP will permit increased service to be realized by the proposed station. Further, no new prohibited interference is predicted to occur to any other stations as a result of the WNSH power increase proposed herein.

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The instant proposal complies with Section 73.24(g). The population within the 1,000 mV/m contour (132 persons) is less than 1 percent of the population within the 25 mV/m contour (106,900 persons).

**Antenna System Description**

The use of the currently licensed nighttime antenna system is proposed herein for use in daytime non-directional operation. The proposed daytime antenna system consists of a single tower, 56 electrical degrees tall. The tower is top loaded with approximately 10 degrees of apparent electrical height accomplished by adding six, ten foot horizontal arms attached to the top plate of the tower. Current distribution measurements included in the previously granted license application BL-20010529ACT show an effective electrical height of 66°.

As demonstrated in prior FCC filings for WNSH (specifically BL-20010529ACT and BL-20021217ACH) the efficiency of the licensed nighttime non-directional facility does not meet the minimum efficiency specified in Section 73.189. Consequently the use of the same non-directional antenna system for the proposed daytime operation will also not meet the minimum efficiency specified in the Rules. Specifically, the efficiency of licensed nighttime and the proposed daytime operation is 196.9 mV/m at 1 kW. As stated in previous filings, it is believed that the loss of efficiency is due to the physical environment in and around the site which are beyond the licensee's control. No changes to the nighttime non-directional antenna system are proposed herein. If a continued waiver of Section 73.45(a) and 73.189(b)(2)(ii) is needed, then it is hereby respectfully requested on behalf of the applicant and supported by data on file with the Commission.

According to information provided by the applicant and that included in the license (File Number BL-20021217ACH), the ground system consists of 120 radial wires of #10 soft drawn copper, spaced as evenly as possible around the base of each tower. Each wire is approximately 47.8 meters (1/4 wavelength) long around the existing tower. Due to the lack of soil at the transmitter site, the majority of the ground system is laid across the bare rock ground surface.