

Statement Concerning Auxiliary Facility WTKV(FM) in Proximity to WSGO(AM) Site

This firm was retained to prepare this engineering report in support of a waiver for the special operating conditions/restrictions imposed on Construction Permit No. BXPB-20001102ABA. This permit is for the addition of auxiliary facilities for radio station WTKV(FM), Oswego, NY, owned by Galaxy Communications. Auxiliary facilities of 2.5 kW at 114 meters HAAT have been requested and authorized. A waiver is requested on operating condition/restriction (2) of the construction permit regarding a partial proof to be completed on AM station WSGO - Oswego, NY. Condition/restriction (2) states in part "Prior to the construction of the **tower** authorized herein, permittee shall notify AM Station(s) listed below...." Based on the information contained in this statement, it is believed this condition should be dropped from the construction permit.

The supporting tower for the WTKV(FM) auxiliary facility is an **existing** structure owned by Galaxy Communications. The tower stands 132 meters above ground level and is located 1.032 km from the antenna system of WSGO. WSGO operates on 1440 kHz. The proposed auxiliary antenna and feedline were in place at the time the present WTKV (FM) main antenna was constructed and the measurements required by §73.1692 were performed on behalf of WSGO. The auxiliary facility will not require any physical construction or alteration within the affected radius of WSGO. Therefore, the measurements normally required by §73.1692 to protect WSGO would merely duplicate measurements already on file with the Commission.

The WSGO tower stands 61 meters AGL, including a base pier. The radiating element is 103.8° in electrical length for operation in 1440 kHz. WSGO is owned by Galaxy Communications. The WTKV(FM) auxiliary facility antenna and transmission line have no effect on the operation of WSGO for the following reasons.

- 1) The WTKV(FM) auxiliary antenna is a three (3) bay Gates FMC-3 antenna. The antenna is electrically bonded to the tower and the elements only protrude 1.6° (at the WSGO frequency for 1440 kHz) electrically from the side of the tower.
- 2) The diameter of the transmission line is a very small percentage of the mass of the structure. The fact the transmission line is bonded to the tower essentially makes it part of the structure electrically.
- 3) The overall height of the existing tower is not changing with the installation of the auxiliary antenna and feedline.
- 4) There has been no history of re-radiation in the operation of WSGO from the existing tower.
- 5) WSGO and WTKV(FM) are co-owned by Galaxy Communications. Galaxy Communications is aware of the potential for re-radiation and willing to remedy the situation if any interference results.

Based on the above considerations, the addition of the WTKV(FM) auxiliary antenna and transmission line would produce no significant change in the potential for re-radiation of the existing tower supporting the antenna. Therefore, it is requested the condition on the WTKV(FM) construction permit, with respect to AM station WSGO, be removed.