

ENGINEERING STATEMENT IN SUPPORT OF REQUEST FOR WAIVER REGARDING
PROPOSED NIGHTTIME OPERATION
WWRV 1330 kHz 10 kW DA-2 U
NEW YORK, NEW YORK
NOVEMBER 2014

INTRODUCTION

The following engineering analysis has been prepared on behalf of Radio Vision Cristiana Management Corporation, license of non-commercial station WWRV(AM) New York, New York with respect to its pending application for site change, (BP-20131104AQW). WWRV was notified by a member of the Audio Division staff on July 8, 2014 that the proposed nighttime facility entered the existing 25% RSS night limit of co-channel station WENA(AM), Yauco, Puerto Rico in violation of Section 73.182 of the Commission's Rules. Since that time communication with the FCC audio division and international division has taken place. The issues that are believed to be at hand are listed below:

1. Whether the audio division calculation of the WENA(AM) 25% RSS night limit consisting of the contributions of 8.4 mV/m from Region II List A station YVOY(AM), 6.0 mV/m from List A station YVPJ(AM), 5.2 mV/m from List A station HJNR(AM), and 3.5 mV/m from WYRD(AM), omits international stations which would raise the WENA RSS night limit. Including all stations that are determined by the ITU to comply with the Rio de Janeiro, 1981 Agreement would have a direct impact on 73.182 compliance. Part of this analysis includes a determination of whether stations the FCC designates as Region II List B stations, examples are 4VJD and YVTU which are found on the Master Register list (MIFR), may be properly included in the WENA RSS calculation.
2. Assuming that the FCC Audio Division conclusion that the proposed WWRV nighttime facility RSS contribution of 4.9 mV/m increases the limit from the

current 12.1 mV/m to 13.0 mV/m is correct, are circumstances such that a waiver of 73.182 is warranted as being in the public interest?

INTERNATIONAL STATIONS TO BE CONSIDERED IN THE WENA NIGHT RSS

On August 19, 2014 a member of the International Branch advised the affiant of the status of the following stations in the FCC database at that time:

4VJD	SARTHES 1	1330.00000 XN	10.000 kW	Night:	List B
18-34-00.0 N	72-19-00.0 W	FACILITY ID 103899			
YVTU	LAGUNILLAS	1330.00000 XN	10.000 kW	Night:	List B
10-10-00.0 N	71-15-00.0 W	FACILITY ID 103918			
YVOY	CALABOZO	1330.00000 XN	5.000 kW	Night:	List A
8-55-00.0 N	67-30-00.0 W	FACILITY ID 103916			
YVPJ	RUBIO	1330.00000 XN	5.000 kW	Night:	List A
7-42-00.0 N	72-19-00.0 W	FACILITY ID 103920			
HJNR	S GIL 1	1330.00000 XN	5.000 kW	Night:	List A
6-32-00.0 N	73-07-00.0 W	FACILITY ID 103876			
NO CALL	GRAND TURK	1320.00000 XN	50.000 kW	Night:	List B
21-26-03.0 N	71-09-01.0 W	FACILITY ID 103791			
CMKM	BANES	1330.00000 XN	1.000 1 kW	Night:	List B
20-59-00.0 N	75-43-00.0 W	FACILITY ID 103880			
TGMU	UNIONRADIO	1330.00000 XN	10.000 kW	Night:	List D
14-34-00.0 N	90-31-00.0 W	FACILITY ID 103892			
ZYI-533	BELEM	1330.00000 XN	5.000 kW	Night:	List A
1-28-00.0 S	48-29-00.0 W	FACILITY ID 1038149			
CMCP	ARTEMISA	1330.00000 XN	0.500 kW	Night:	List B
22-48-00.0 N	82-15-00.0 W	FACILITY ID 103878			

Affiant inquired as to the source material for the List of A and B stations and the meaning associated with the designations. A response was supplied in an e-mail from the International Branch on August 21, 2014 which stated:

List A and List B are parts of the Basic Inventory which was part of the RJ81 Region II plan. Stations on List A of the plan are those “whose caused and received interference are accepted;” List B are the other stations. We normally use List A stations in domestic RSS computations, and do not use List B stations. List C stations are the equivalent of a List A station, but for a country that did not sign the RJ81 agreement. List D is the equivalent of a List B finding for a non-signatory country.

In 1987, under file number BP-870714AE, an application for construction permit was filed for what are now the currently licensed WWRV (formerly WNYM) nighttime transmission facilities. Exhibit 1 attached is a nighttime allocation study for WENA wherein the WENA RSS night limit was calculated and the 50% RSS was determined to be made up by YVOY and YVPJ. Exhibit 2 attached contains the six pages of information generated by the FCC staff at that time in reviewing the application for CP, the last four of which pertain to the current WWRV nighttime operation and the stations to be considered in the WENA RSS night limit. The fifth page of Exhibit 2 indicates that YVOY and YVPJ were both on the Rio List A at that time. However, YVTU at Lagunillas, Venezuela was determined to be operating as well. We are unable to tell from the FCC files what stations were considered in granting the WWRV construction permit on November 30, 1987.

Two statements are made in the November 5, 1987 staff memo, page 6 of Exhibit 2 , that are believed to be highly important and pertinent to the pending WWRV application:

“Further, **it would not be in the public interest to restrict a U.S. licensee from improving the facility of a station where there is a reasonable possibility that no actual harm would result.**”
Emphasis added.

“As is evident from the above, we lack definitive information regarding the Venezuelan stations at this time. **Of course, when our information is updated through either bilateral meetings or IFRB notifications, the database will be adjusted and hopefully your studies and consideration of applications involving this type of question will be less complicated.** This is a subject that is confusing to both the Commission as well as the broadcast industry.” Emphasis added.

Given the ambiguity that existed in 1987, and the fact that the data being used by the FCC at this time, almost 30 years later, appears to be essentially unchanged it is believed appropriate to review the resources that were considered in the 1980s and which are still available today. They are:

The World Radio and TV Handbook – the 2014 version.

MIFR from the ITU/BR/IAP/TAS, BR International Frequency Information Circular (BR IFIC) - Terrestrial Services, August 5, 2014.

The World Radio TV Handbook has been reviewed. We reserve discussion of its contents at this time, believing that the ITU MIFR offers definitive information and is the preferred resource document.

The ITU Master International Frequency Register (“MIFR”) is the official source of international data for Medium Wave Broadcast stations like WENA and the international stations which impact its nighttime interference free contour and in turn the radiation limitation for the proposed WWRV nighttime facility. The specific data employed in these calculations is identified in the MIFR as “RJ81 - The Regional Agreement on MF Broadcasting, (Region 2), Rio de Janeiro, 1981. What is fundamentally at issue is whether Region II stations 4VJD, Sarthes, Haiti, MIFR record identifier 82000662 and YVTU Lagunillas, Venezuela, MIFR record identifier 820001264 are considered as conforming to the Rio 1981 agreement.

We communicated directly with the ITU to determine how to correctly read the MIFR database records. The e-mail below dated August 28, 2014 explains the process:

From: Abou Chanab, Bachar [<mailto:bachar.abouchanab@itu.int>]
Sent: Thursday, August 28, 2014 5:15 AM
To: Clarence Beverage
Cc: Ba, Ben Ousmane; BRMAIL, ITU; TerRaSoftHelp, ITU
Subject: RE: BRIFIC CD

Dear Clarence Beverage

Thank you for your email and enquiry about the BR IFIC DVD content and usage.

As we understand it, you seem to be looking for the terrestrial LF/MF broadcasting assignments, recorded in the MIFR on an “information only” basis.

The relevant indicator is stored in one field in the database, named “Finding Observation”, whose values and their meanings can be found in the Preface to the BR IFIC (terrestrial services), in Table 12.2.2 (attached below for ease).

12.2.2 Findings observation:

The symbols used are as follows:

Symbol	Description
H	This assignment shall be operated subject to not causing harmful interference to or claiming protection from the existing or planned assignments that conform with the relevant Plan or List (GE06L) indicated after the symbol X under Item 13B1 (finding reference) of this assignment, or the assignments of administrations for which no successfully completed coordination has been notified, and which are indicated under Item 11 (coordination information) after a reference to the relevant provisions.
Q	The favourable finding for this assignment, with respect to RR11.32 was based on earth station information submitted to the Bureau under the provisions of RR11.9. The finding may be reviewed if the Bureau receives a comment from another administration, within three years following the date of notification of this assignment, indicating that the concerned assignment was included in a coordination procedure initiated by this latter administration pursuant to RR9.15, RR9.17 and/or RR9.17A in respect to its earth station, and was not agreed to, or was agreed with different technical characteristics.
R	In accordance with the provisions of the Table of Frequency Allocations, the Appendix or the Resolution indicated in "finding reference", the present assignment is to be operated subject to not causing harmful interference or, in the case of No. 5.316A, subject to not causing unacceptable interference to stations of (a) particular service(s) in the Region(s) or countries to which the finding reference applies.
S	The service indicated in class of station being secondary (RR5.28), this assignment is not taken into account when examining, with respect to the provisions of Article 11, an assignment pertaining to a primary service.
V	In accordance with RR23.8 of the Radio Regulations, this frequency assignment has a lower status with respect to the assignments to the broadcasting service within the Tropical Zone and within the bands listed in RR23.6.
X	This assignment, which should have been transferred to another frequency in accordance with a transfer procedure decided by a Radiocommunication Conference, was not acted upon by the concerned Administration and hence has been retained in the Master Register without a date in date of recognition (Date of Entry in the Master Register) and for information only.
Y	Pursuant to the provisions referred to in Finding Reference, this assignment is not taken into account when examining frequency assignments in accordance with the provisions of Article 11 of the Radio Regulations. The present assignment has been recorded or retained in the Master Register for information only.

With the above information in hand we are able to look at the MIFR records for the stations in question and determine if they are, or are not, accepted in the Rio Agreement.

Exhibit 3 is a copy of the printout from the MIFR August 5, 2014 database. The finding status is final as of February 15, 2000 for 4VJD, Sarthes Haiti.

Exhibit 4 is a copy of the printout from the MIFR August 5, 2014 database. The finding status is final as of February 15, 2000 for YVTU, Lagunillas, Venezuela.

For reference purposes we include here copies of the MIFR August 5, 2014 database records for YVOY, YVPJ and HJNR as the FCC identifies these stations as being unique and includes them in its RSS night limit calculations for WENA.

Exhibit 5 is a copy of the printout from the MIFR August 5, 2014 database. The finding status is final as of February 15, 2000 for YVOY, Calabozo, Venezuela.

Exhibit 6 is a copy of the printout from the MIFR August 5, 2014 database. The finding status is final as of February 15, 2000 for YVPJ, Rubio, Venezuela.

Exhibit 7 is a copy of the printout from the MIFR August 5, 2014 database. The finding status is final as of February 15, 2000 for HJNR, S Gil 1, Columbia.

A review of the five MIFR database listings reveals that each record carries Finding Reference RJ81. There is no difference between the records in terms of their compliance with the Rio Agreement. The explanatory Preface to the BR IFIC 2775, page 329, identifies Symbol RJ 81 as:

This frequency assignment is either in conformity with the Plan adopted by the Regional Administrative MF Broadcasting Conference (Region 2), Rio de Janeiro, 1981, or one for which the procedure prescribed in Article 4 of the Regional Agreement, Rio de Janeiro, 1981, has been carried out successfully.

THE WENA NIGHT ITU MIFR RECORD

The August 5, 2014 Region II database in the MIFR has been searched and there is only one record for WENA which is found attached in Exhibit 8. Review of the official ITU record reveals significant disparities with the FCC database as seen below:

1. The community of license listed in the MIFR for WENA is Penuelas while the FCC database says Yauco.
2. The coordinates in the MIFR are those associated with WENA license BL-850617AP which is attached in Exhibit 9 and not the coordinates in CDBS associated with BL-19990816DE. To be very specific, The WENA licensed facility in CDBS does not appear in the ITU MIFR database and therefore is believed to have no international protected status.
3. The MIFR night record is for 1 kW ND operation and not the two tower directional, 1.4 kW, record in the FCC CDBS.

Based on the MIFR data included here it is believed that the WENA facility is improperly coordinated. This raises the question of whether WENA is even entitled to nighttime protection. It is hoped that WWRV need not get involved in questions such as this and the information herein is found to be so clear and sufficiently compelling that the staff can grant the pending application without delay.

CONCLUSION

Based on the ITU Master International Frequency Register (“MIFR”), the five stations which have been studied here, as described in Exhibit 3 – 7, are all in compliance with the Rio de Janeiro 1981 Agreement and as such are believed to be properly included in the RSS night limit computation for WENA. With all five stations considered the proposed WWRV nighttime facility does not enter the WENA 50% or 25% RSS night limit and is therefore believed to be in compliance with Section 73.182 of the Commission’s rules.

Should the staff disagree with the applicant regarding the above conclusion, further clarification is requested and if necessary the applicant can provide significant public interest justification for a waiver of rule Section 73.182. There are multiple facets to a waiver request, among them the fact that no actual interference to WENA would occur as the interference, as calculated by the FCC, is to the 25% RSS and not the 50% RSS coverage contour. Further, WWRV’s night coverage and service to the public would be damaged significantly if it were necessary to reduce the WWRV proposed operating power and associated nighttime coverage contours to comply with 73.182 as the staff currently considers the night allocation to exist.

The foregoing was prepared on behalf of Radio Vision Cristiana Management Corporation by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

November 13, 2014



LOHNES AND CULVER
CONSULTING RADIO ENGINEERS
1156 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
(202) 296-2722

FREDERICK D. VEIHMEYER
ELIZABETH L. DAHLBERG, P.E.
ROBERT D. CULVER, P.E.
GARRISON C. CAVELL

OF COUNSEL
GEORGE M. LOHNES
RONALD H. CULVER

BY HAND

October 29, 1987

Karen Rackley, Engineer
AM Branch, Room 344
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

RE: AM Application File No. 870714AE
to Change Transmitter Site and
Directional Antenna
WNYM, New York NY

Dear Miss Rackley:

As further clarification of the nighttime channel study contained in the WNYM application (Exhibit E), there is enclosed a detailed channel study concerning station WENA, located in Puerto Rico.

It has been noted that List A of the Rio Final Acts includes four Venezuelan assignments shown on the enclosed channel study. On a "worst case basis", if only the Tucipita assignment is considered, the limit from WNYM would not enter into the RSS of 3.43 mV/m which consists of a 2.03 mV/m limit from WFBC and 2.76 mV/m from Tucipita.

Sincerely,

Elizabeth L. Dahlberg

ELD/vb

Encl.

EXHIBIT 1 - 2 PAGES

To WENA (license) Penuelas P.R.

	From YVOY Calabago VEN 5 kW	From YVPJ Rubio VEN 5 kW	From NEW Araira VEN 1 kW	From NEW Tucupita VEN 1 kW	From WFBC Greenville SC	From WNYM Proposed
1 KILOMETERS	1019	1301	844	1112	2430	2636
2 MID-POINT LATITUDE	14	13	14	14	27	29.5
3 AZIMUTH ANGLE	--	--	--	--	136.2	162.5
4 RADIATION ON GROUND	692	692	309.5	309	1539	1475
5 MIN.-MAX. V ANGLE	5.7-10.9	3.4-7.5	7.8-14	4.9-9.6	0-0.1	0
6 MAX. RAD.	687	690	305	307	1539	1475
7 SKYWAVE FIELD 10% LIMIT	0.052	0.033	0.068	0.045	0.0066	0.0054
9 RSS	7.14	4.55	4.14	2.76	2.03	1.59

8.47

3.43

To WENA (c.p.) Santo Domingo P.R.

	From YVOY	From YVPJ	From Araira VEN	From Tucupita	From WFBC	From WNYM Proposed
1 KILOMETERS	1015	1290	841	1118	2422	2635
2 MID-POINT LATITUDE	14	13	14	14	27	29.5
3 AZIMUTH ANGLE	--	--	--	--	136.6	162.9
4 RADIATION ON GROUND	692	692	309.5	309	1537	1474
5 MIN.-MAX. V ANGLE	5.8-11	3.5-7.6	7.8-14	4.8-9.5	0-0.2	0
6 MAX. RAD.	687	690	305	307	1537	1474
7 SKYWAVE FIELD 10% LIMIT	0.0525	0.0335	0.068	0.0445	0.0067	0.0054
9 RSS	7.21	4.62	4.14	2.73	2.06	1.59

8.56

3.42

Note:

The four Venezuela assignments are shown on List A of the Rio Final Acts 1981.

World Radio and TV Handbook shows operating stations:

YVOY Calabago 5 kW
YVPJ Rubio 10 kW

FIGURE 1
CALCULATIONS OF NIGHTTIME LIMITS
TO WENA

WNYM (proposed) 1330 kHz 5 kW DA1
(File No. 870714AE)
NEW YORK, NEW YORK

Prepared by
Lohnes and Culver Washington, D.C.
October, 1987

Height: 5 kw (Directional Antenna)
 Day: 5 kw (Directional Antenna)
 Form BC-212
 July 1977

DB-CK

NOV 30 1987
ANTENNA AND SITE APPROVAL
WORK SHEET

FILE NO. BP-870714HE	CALL SIGN WNJYM
LOCATION New York, NY	
FREQUENCY 1330 kHz	POWER 5kw - U OH-1, U

PROPOSED CHANGE To move transmitter site to WWDJ-970 kHz - site and duplex with WWDJ using existing three tower array.
 D=26 6-20

OVERLAP/INTERFERENCE
 Decrease in overlap with WRAP-1330, WESR & WASH-1330, WJHC & WALL, 1340.
 Increase of night limit to WENR PR- OK YVOY-Venezuela, limit OK to use. See

COVERAGE Letter from Larry Olson attached.
 Overall increase of land area and population covered.

PSA: N/A. *OK* 11/16/82

ENVIRONMENTAL IMPACT: minor. 1) also requires 1.0-5 + 0.025 6.4m

APPROPRIATE CHECK SHEETS REVIEWED? ✓

ENGINEER KR
DATE 11-9-87

TRANSMITTER LOCATION: 110 Commerce Way, Hackensack, NJ

TRANSMITTER:

COORDINATES

NORTH LATITUDE 40° 54' 39" **WEST LONGITUDE** 74° 01' 42"

Tower marking and lighting in accordance with paragraphs 1, 3, 11 + 21 **FCC Form 715.**

ANTENNA:
 Attached

GROUND SYSTEM: ~~120~~ consists of 120 equally spaced, buried, copper radicals between 61 m and 77 m in length except when shortened and bonded, plus a 14.6 m square ground screen about the base of each tower.

CONDITIONS:
 Attached

EXHIBIT 2 - SIX PAGES

DIRECTIONAL ANTENNA SYSTEM

CALL: WUNM FREQUENCY: 1330 ~~970~~ kHz
FILE NO: BP-870714AE POWER: 5kw DA-1, U
COORDINATES: 40° 54' 39" NORTH 74° 01' 42" WEST

1. DESCRIPTION OF DIRECTIONAL ANTENNA SYSTEM:

No. and Type of Elements: Three (3) vertical, guyed, series excited, steel radiators of uniform cross-section. Also used for diplexed operation of WUNJ-AM on 970 kHz. Theo. RMS: 781.0 mV/m at 1 km. Std. RMS: 820.4 mV/m at 1 km, Q: 23.36

Height Above Insulators: 76 m (122')

Overall Height: 77.4 m

Spacing and Orientation: Towers spaced 123.2' ^{apart} on a line bearing 146° true.

Nondirectional Antenna: None used.

2. THEORETICAL SPECIFICATIONS:

PHASING	TOWER	NW (#1)	C (#2)	SE (#3)
Night:		0°	-138°	84°
Day:				
FIELD RATIO		1.0	1.03	0.70
Night:				
Day:				

The inverse distance field strength at a distance of one ^{kilometer} ~~mile~~ from the above antenna in the directions specified shall not exceed the following values:

<u>Azimuth</u>	<u>Radiation</u>
7.0° T	134.7 mV/m
60.5° T	134.7 mV/m
231.5° T	134.7 mV/m
285.0° T	134.7 mV/m

#2 5-NOV-1987 11:36:08
 From: ANLYT::OLSON
 To: RACKLEY,OLSON
 Subj: PLEASE FORWARD THIS TO HENRY STRAUBE

From: ANLYT::OLSON 5-NOV-1987 11:35
 To: STRAUBE,OLSON
 Subj: VENEZUELA

Henry,

Betty Dahlberg called regarding an application for WNYM, New York, NY (1330 kHz, 5 kW, DA-1, U). The application proposes a different site and directional antenna system. Basically, the proposed antenna pattern directs the main lobe southeast whereas the licensed antenna pattern is oriented to the northeast. Because the application proposes a significant increase in radiation to the southeast, there is a question of nighttime protection to station WENA, Penuelas, PR (1330 kHz, 500 W, 1 kW-LS, U). I note that the database indicates that WENA has a Construction Permit to change site, install a directional antenna system, increase power, and to change city of license to Saucó. This Construction Permit, however, has little or no effect on the question of protection to WENA.

According to Betty, the WNYM proposal would raise the RSS of WENA if only U.S. stations were considered, as is the normal case. She noted, however, that should RSS calculations include limits from two Venezuelan stations (located at Calabozo and Rubio) the WNYM proposal would not increase the RSS of WENA. In fact, she said that this would hold true if either of the two Venezuelan stations were included. Thus, the proposal for WNYM would be acceptable.

In view of this she asked that we check to see if either of the Venezuelan stations were operating and asked us to inform the AM Branch of our findings. She also indicated that the 'World Radio and TV Handbook' shows both Venezuelan stations to be operating.

During and since the Rio Conference (1981) we have had discussions with the Venezuelans in an attempt to establish an accurate station inventory as well as to resolve incompatibilities between U.S. and Venezuelan stations listed in the Rio Plan and any subsequent modifications to the Plan which have been notified to the IFRB.

I have reviewed the notes of our discussions with the Venezuelans and have discussed the situation with Wilson. Below is a list of the Venezuelan stations on 1330 kHz, followed by a discussion representing our best understanding of the Venezuelan intentions and our reasoned recommendation at this time.

ARAIRA				VE 1330 kHz		Day ND-2-U
N	Lat 10 28 00 W	Lon 66 28 00	Class	Region 2	Class C	RMS: 317.79 mV/m
	1.00000 kW	Proposal	CL#	()	Last Updated	860325
	1 Towers;	Theo Pattern;	0 Augmentations;	Q;		; Cutoff:
IFRB Serial # 000001633; Entered into List A on 820101						
Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown						
	Field			Tow Ref		
	Ratio	Phasing	Spacing	Orient	Switch	Height
	1.0000	0.000	0.000	0.000	0	90.0

ARAIRA				VE 1330 kHz		Nit ND-2-U
N	Lat 10 28 00 W	Lon 66 28 00	Class	Region 2	Class C	RMS: 309.50 mV/m
	1.00000 kW	Proposal	CL#	()	Last Updated	860325

MAIL:

#2

5-NOV-1987 11:36:08

MAIL

1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001633; Entered into List A on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 90.0

YVDY CALABOZO VE 1330 kHz Day ND-2-U
 N Lat 08 55 00 W Lon 67 30 00 Class Region 2 Class C RMS: 318.14 mV/m
 5.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001634; Entered into List A on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 90.0

YVDY CALABOZO VE 1330 kHz Nit ND-2-U
 N Lat 08 55 00 W Lon 67 30 00 Class Region 2 Class C RMS: 309.47 mV/m
 5.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001634; Entered into List A on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 90.0

YVTU LAGUNILLAS VE 1330 kHz Day ND-2-U
 N Lat 10 10 00 W Lon 71 15 00 Class Region 2 Class B RMS: 317.77 mV/m
 10.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001635; Entered into List B on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 90.0

YVTU LAGUNILLAS VE 1330 kHz Nit ND-2-U
 N Lat 10 10 00 W Lon 71 15 00 Class Region 2 Class B RMS: 309.46 mV/m
 10.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001635; Entered into List B on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 90.0

YVPJ RUBIO VE 1330 kHz Day ND-2-U
 N Lat 07 42 00 W Lon 72 19 00 Class Region 2 Class C RMS: 318.14 mV/m
 5.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:
 IFRB Serial # 000001636; Entered into List A on 820101
 Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown
 Field Tow Ref
 Ratio Phasing Spacing Orient Switch Height
 1.0000 0.000 0.000 0.000 0 99.0

YVPJ RUBIO VE 1330 kHz Nit ND-2-U
 N Lat 07 42 00 W Lon 72 19 00 Class Region 2 Class C RMS: 309.47 mV/m
 5.00000 kW Operating CL# () Last Updated 860325
 1 Towers; Theo Pattern; 0 Augmentations; Q: ; Cutoff:

MAIL

#2

5-NOV-1987 11:36:08

MAI

IFRB Serial # 000001636; Entered into List A on 820101

Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown

Field	Phasing	Spacing	Orient	Tow Ref	Switch	Height
Ratio	0.000	0.000	0.000	0	0	99.0

TUCUPITA

VE 1330 kHz

Day ND-2-1

N Lat 09 06 00 W Lon 62 06 00 Class Region 2 Class C RMS: 317.79 mV/m

1.00000 kW Proposal CL# () Last Updated 860325

1 Towers; Theo Pattern; 0 Augmentations; Q; ; Cutoff;

IFRB Serial # 000001637; Entered into List A on 820101

Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown

Field	Phasing	Spacing	Orient	Tow Ref	Switch	Height
Ratio	0.000	0.000	0.000	0	0	90.0

TUCUPITA

VE 1330 kHz

Nit ND-2-1

N Lat 09 06 00 W Lon 62 06 00 Class Region 2 Class C RMS: 309.50 mV/m

1.00000 kW Proposal CL# () Last Updated 860325

1 Towers; Theo Pattern; 0 Augmentations; Q; ; Cutoff;

IFRB Serial # 000001637; Entered into List A on 820101

Coordination Status: Canada: Unknown; Mexico: Unknown; Region 2: Unknown

Field	Phasing	Spacing	Orient	Tow Ref	Switch	Height
Ratio	0.000	0.000	0.000	0	0	90.0

The above list depicts the Rio Plan (1981) records that are included in our database and contain separate day and night entries for each station. You will note that of the five stations listed, three are shown as operating and two proposed; four are shown in Rio List A and one in List B. The two in question, Calabozo and Rubio, are shown as operating and in Rio List A.

During our November 1984 bilateral in Caracas, the Venezuelans included for consideration these two stations. However, the worksheet we used does not reflect precisely whether or not they are operating. However, it does show Calabozo operating with a power of 5.02 kW which appears to be the same as that shown in their later lists of actual station operating parameters mentioned below.

Since the November 1984 bilateral, we have received from the Venezuelans a number of station listings which reflect the results of their station inspection project which they instituted to determine the actual operating characteristics of all their AM stations. The following technical information is extracted from such a listing entitled 'INSPECCIONES TECNICAS DE ESTACIONES DE AM' provided us by Horatio Gonzalez during a bilateral meeting at Washington, D.C. on April 9, 1985:

FREQ	CITY	POWER	G	GRND SYS	COORDINATES	I(ant)	Z(ant)
1330	Calabozo	5.02kW	90deg	120/56.4m	8-55-00/67-30-00	11.5a	38+J30ohm

Note: That list does not show Rubio in operation.

At every opportunity (e.g. IFRB seminars and CITELE meetings) we have tried to resolve issues such as these with the Venezuelans. Often it seemed as if progress was being made and that the Venezuelan administration would formally submit to the IFRB the results of our efforts (i.e., deletions or power reductions). This seldom, if ever, occurred. Mostly, however, it seemed as if the Venezuelan negotiators either lacked the authority to make commitments or were not technically prepared at the time to resolve the questions. Finally, I would note that there appeared to be a lack of continuity within the Venezuelan administration with respect to those persons responsible for such

MAIL

#2

5-NOV-1987 11:36:08

MAIL

matters since the Venezuelan participants would change from meetings-to-meetings.

As is evident from the above, we lack definitive information regarding the Venezuelan stations at this time. There are, though, reasonable indications that at least the Calabozo station has been and still is in operation. For example, unless the Venezuelans made deliberate, false representations, the antenna current and impedance shown above would presumably be derived from actual operating conditions at the station. For this reason, we believe that use of this station when considering interference to WENA is appropriate. Although, as we have pointed out, there are real questions regarding the status of the Venezuelan stations, it should be recognized that this is the best information available to us at this time and as a result should depict a more realistic interference situation in Puerto Rico. Further, it would not be in the public interest to restrict a U.S. licensee from improving the facilities of a station where there is a reasonable possibility that no actual harm would result. Of course, when our information is updated through either bilateral meetings or IFRB notifications, the database will be adjusted and hopefully your studies and consideration of applications involving this type of question will be less complicated.

I have discussed this only in general terms with Betty. I told her I was researching my records and would inform you of my findings so that your office could take that into account when you decide a course of action. She waits your decision on this matter.

This is a subject that is confusing to both the Commission as well as the broadcast industry. It would be helpful to be able to resolve all of the unknowns regarding the Venezuelan stations. However, as the foregoing should indicate, this case alone involved considerable time and effort to develop the information presented above. If we were to undertake to do this for all the Venezuelan stations, the required resources would be far in excess of that available to us at this time. Our entire staff is currently occupied with high-priority and time-consuming tasks that simply do not permit such a project to be started now. Finally, even if we were in a position to concentrate on it now, there is no assurance that the Venezuelan administration would be in a position to participate in a fruitful manner at this time.

Larry/10-29-87

MAIL

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - HTI - NTFD_RR - 082000662

Administrative Data		Emission Characteristics	
Source notice type	1A7	Assigned frequency	1330.00000 kHz
Date of notice		Ground conductivity	
Date notice received	29/10/1992	Noise zone	2
Notifying Administration	HTI		
Identifier assigned by the BR	082000662		
Unique identifier given by the Administration			
Date of entry into the MIFR	01/01/1982		
Fragment	NTFD_RR		
Provision	REVIFB		
Operating agency			
Address code			
Date of bringing into use	01/01/1982		

Station and Site Information		Finding Information			
Site name	SARTHES 1	Finding type	Finding status	Finding	Date of update
Geographic area	HTI	CONFORM PLAN	FINAL	FAVORABLE	15/02/2000
Radiocommunication region	2	REX	FINAL	FAVORABLE	15/02/2000
Geographic coordinates	72°19'00"W - 18°34'00"N	Finding observation	H		
Station identification		Finding reference	RJ81		
Call sign	4VJD	Finding action			

Day Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	10.00000 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	977.20000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - VEN - NTFD_RR - 082001264

Administrative Data

Source notice type	1A7
Date of notice	
Date notice received	01/01/1982
Notifying Administration	VEN
Identifier assigned by the BR	082001264
Unique identifier given by the Administration	
Date of entry into the MIFR	01/01/1982
Fragment	NTFD_RR
Provision	RR11.2
Operating agency	
Address code	
Date of bringing into use	01/01/1982

Emission Characteristics

Assigned frequency	1330.00000 kHz
Ground conductivity	
Noise zone	2

Station and Site Information

Site name	LAGUNILLAS
Geographic area	VEN
Radiocommunication region	2
Geographic coordinates	71° 15'00"W - 10° 10'00"N
Station identification	
Call sign	YVTU

Finding Information

Finding type	Finding status	Finding	Date of update
CONFORM PLAN	FINAL	FAVORABLE	15/02/2000
REX	FINAL	FAVORABLE	15/02/2000
Finding observation			
Finding reference	RJ81		
Finding action			

Day Time Operations

Operation 1

General Characteristics

Regular hours of operation	
----------------------------	--

Antenna Characteristics

Antenna type	A
--------------	----------

Power to the antenna	10.00000 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	1000.00000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	10.00000 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	977.20000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Status Information

Source of notice	NOTIFIER
Last update	ITU - 13/08/2008
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

Transmission system	ANALOG	Antenna directivity	ND
---------------------	---------------	---------------------	-----------

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	92.00	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	10.00000 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	977.20000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	92.00	0				

Status Information

Source of notice	ITU
Last update	ITU
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - VEN - NTFD_RR - 082001263

Administrative Data

Source notice type	1A7
Date of notice	
Date notice received	01/01/1982
Notifying Administration	VEN
Identifier assigned by the BR	082001263
Unique identifier given by the Administration	
Date of entry into the MIFR	01/01/1982
Fragment	NTFD_RR
Provision	RR11.2
Operating agency	
Address code	
Date of bringing into use	01/01/1982

Emission Characteristics

Assigned frequency	1330.00000 kHz
Ground conductivity	
Noise zone	2

Station and Site Information

Site name	CALABOZO
Geographic area	VEN
Radiocommunication region	2
Geographic coordinates	67° 30'00"W - 8° 55'00"N
Station identification	
Call sign	YVOY

Finding Information

Finding type	Finding status	Finding	Date of update
CONFORM PLAN	FINAL	FAVORABLE	15/02/2000
REX	FINAL	FAVORABLE	15/02/2000
Finding observation			
Finding reference		RJ81	
Finding action			

Day Time Operations

Operation 1

General Characteristics

Regular hours of operation	
----------------------------	--

Antenna Characteristics

Antenna type	A
--------------	----------

Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	707.90000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	691.80000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Status Information

Source of notice	NOTIFIER
Last update	ITU - 13/08/2008
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - VEN - NTFD_RR - 082001265

Administrative Data		Emission Characteristics	
Source notice type	1A7	Assigned frequency	1330.00000 kHz
Date of notice		Ground conductivity	
Date notice received	01/01/1982	Noise zone	2
Notifying Administration	VEN		
Identifier assigned by the BR	082001265		
Unique identifier given by the Administration			
Date of entry into the MIFR	01/01/1982		
Fragment	NTFD_RR		
Provision	RR11.2		
Operating agency			
Address code			
Date of bringing into use	01/01/1982		

Station and Site Information		Finding Information			
Site name	RUBIO	Finding type	Finding status	Finding	Date of update
Geographic area	VEN	CONFORM PLAN	FINAL	FAVORABLE	15/02/2000
Radiocommunication region	2	REX	FINAL	FAVORABLE	15/02/2000
Geographic coordinates	72°19'00"W - 7°42'00"N	Finding observation			
Station identification		Finding reference	RJ81		
Call sign	YVPJ	Finding action			

Day Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	707.90000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	

Transmission system	ANALOG	Antenna directivity	ND
---------------------	---------------	---------------------	-----------

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	99.00	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	691.80000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	99.00	0				

Status Information

Source of notice	NOTIFIER
Last update	ITU - 13/08/2008
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - CLM - NTFD_RR - 082002751

Administrative Data

Emission Characteristics

Source notice type	1A7
Date of notice	
Date notice received	01/01/1982
Notifying Administration	CLM
Identifier assigned by the BR	082002751
Unique identifier given by the Administration	
Date of entry into the MIFR	01/01/1982
Fragment	NTFD_RR
Provision	RR11.2
Operating agency	
Address code	
Date of bringing into use	01/01/1982

Assigned frequency	1330.00000 kHz
Ground conductivity	
Noise zone	2

Station and Site Information

Finding Information

Site name	S GIL 1
Geographic area	CLM
Radiocommunication region	2
Geographic coordinates	73°07'00"W - 6°32'00"N
Station identification	
Call sign	HJNR

Finding type	Finding status	Finding	Date of update
CONFORM PLAN	FINAL	FAVORABLE	15/02/2000
REX	FINAL	FAVORABLE	15/02/2000
Finding observation			
Finding reference		RJ81	
Finding action			

Day Time Operations

Operation 1

General Characteristics

Antenna Characteristics

Regular hours of operation	
----------------------------	--

Antenna type	A
--------------	----------

Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	660.70000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		Antenna type	A
Power to the antenna	5.01187 kW	Pattern type	
Bandwidth	10.00000 kHz	RMS field	691.80000 mV/m 1km
Class of emission	A3EGN	Special quadrature factor	
Transmission system	ANALOG	Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	89.90	0				

Status Information

Source of notice	NOTIFIER
Last update	ITU - 13/08/2008
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

TerRaQ 2013 [BRIFIC 2775 - 05/08/2014] - Recorded assignment - USA - RJ81 - 081016147

Administrative Data		Emission Characteristics	
Source notice type	1A7	Assigned frequency	1330.00000 kHz
Date of notice		Ground conductivity	
Date notice received		Noise zone	1
Notifying Administration	USA		
Identifier assigned by the BR	081016147		
Unique identifier given by the Administration			
Date of entry into the Plan	10/02/1987		
Fragment	RJ81		
RJ81 Plan identifier	16147		
RJ81 Plan class	B		

Station and Site Information		Finding Information	
Site name	PENUELAS PR	Finding observation	
Geographic area	PTR	Finding reference	
Radiocommunication region	2	Finding action	
Geographic coordinates	66°42'14"W - 18°03'05"N		
Station identification			
Call sign	WENA		

Day Time Operations			
Operation 1			
General Characteristics		Antenna Characteristics	
Regular hours of operation		RJ81 List	A
Power to the antenna	1.00000 kW	Antenna type	A
Bandwidth	10.00000 kHz	Pattern type	
Class of emission	A3E--	RMS field	296.10000 mV/m 1km
Transmission system	ANALOG	Special quadrature factor	
		Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	75.50	0				

Night Time Operations

Operation 1

General Characteristics		Antenna Characteristics	
Regular hours of operation		RJ81 List	A
Power to the antenna	0.50000 kW	Antenna type	A
Bandwidth	10.00000 kHz	Pattern type	
Class of emission	A3E--	RMS field	209.37000 mV/ m 1km
Transmission system	ANALOG	Special quadrature factor	
		Antenna directivity	ND

Towers						
No	Electrical height (°)	Structure	TLS A	TLS B	TLS C	TLS D
1	75.50	0				

Publication History

Publication	Number	Part	Date
RJ81	9	B	

Status Information

Source of notice	NOTIFIER
Last update	ITU
Processing stage	RECORDED
Is public	TRUE
Publication request	FALSE

AM BROADCAST STATION LICENSE

Subject to the provisions of the Communications Act of 1934, as amended, subsequent Acts, Treaties, and Commission Rules made thereunder, and further subject to conditions set forth in this license,¹ the LICENSEE

SOUTHERN BROADCASTING, INC.

is hereby authorized to use and operate the radio transmitting apparatus hereinafter described for the purpose of broadcasting for the term ending 3 a.m. Local Time **February 1, 1992** in accordance with the following:

1. Station location: **Penuelas, PR**

2. Main Studio location:
(Listed only if not at transmitter site or not within boundaries of principal community)

3. Remote control location: **604 Munoz Rivera St., Penuelas, PR**

4. Transmitter location: **604 Munoz Rivera St., Penuelas, PR**

North latitude : **18° 03 ' 05"**
West longitude: **66° 42 ' 14"**

5. Transmitter(s): Type Accepted. (See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.)

6. Antenna and ground system: **155' (160' overall height) series excited vertical radiator. Ground system: 120 buried copper radials 180' in length plus 120 interspaced radials 50' in length. Theoretical efficiency: 296.1 mV/m/kW at 1 km.**

7. Obstruction marking and lighting specifications — FCC Form 715, paragraphs: **None required**

8. Frequency (kHz.): 1330

9. Nominal power (kW): 1.0 Day
0.5 Night

Antenna input power (kW): 1.0 Day

Non-directional antenna: current 5.6 amperes; resistance 32.0 ohms.
 Directional antenna : current _____ amperes; resistance _____ ohms.

0.5 Night

Non-directional antenna: current 3.95 amperes; resistance 32.0 ohms.
 Directional antenna : current _____ amperes; resistance _____ ohms.

10. Hours of operation: Specified in construction permit (BP **-850617AH**)
11. Conditions: **See Attachment**

EXHIBIT 9 - 2 PAGES

The Commission reserves the right during said license period of terminating this license or making effective any change or modification of this license which may be necessary to comply with any decision of the Commission rendered as a result of any hearing held under the rules of the Commission prior to the commencement of this license period or any decision rendered as a result of any such hearing which has been designated but not held, prior to the commencement of this license period.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934, as amended.

¹ This license consists of this page and pages

edr

Dated: **OCT 9 1986**

FEDERAL COMMUNICATIONS COMMISSION



OCT 16 1986

ATTACHMENT

Condition: Operation with the facilities specified herein is subject to modification, suspension or termination without right to hearing, if found by the Commission to be necessary in order to conform to the Final Acts of the ITU Administrative Conference on Medium Frequency Broadcasting in Region 2, Rio de Janeiro 1981, and to bilateral and other multilateral agreements between the United States and other countries.