

# BakerHostetler

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July 13, 2021

## VIA E-MAIL

Marlene Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554  
Attn: Audio Division, Media Bureau

**Re: WPET(AM), Greensboro, NC (Facility ID No. 71271)**  
**Direct Measurement Application**

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Dear Ms. Dortch:

On behalf of Truth Broadcasting Corporation, transmitted herewith on FCC Form 302-AM is an application for direct measurement of power of AM broadcast station WPET, Greensboro, North Carolina (Facility ID No. 71271). No filing fee is required for this application.

Should you have any questions regarding this transmittal, please contact the undersigned.

Respectfully submitted,



Davina S. Sashkin  
Keenan P. Adamchak

*Counsel for Truth Broadcasting Corporation*

Enclosures

July 13, 2021

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cc: James Bradshaw ([james.bradshaw@fcc.gov](mailto:james.bradshaw@fcc.gov))  
Nazifa Sawez ([nazifa.sawez@fcc.gov](mailto:nazifa.sawez@fcc.gov))

FOR  
FCC  
USE  
ONLY

**FCC 302-AM**  
**APPLICATION FOR AM**  
**BROADCAST STATION LICENSE**

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

**SECTION I - APPLICANT FEE INFORMATION**

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

Truth Broadcasting Corporation

MAILING ADDRESS (Line 1) (Maximum 35 characters)

4405 Providence Lane, Suite D

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

Winston-Salem

STATE OR COUNTRY (if foreign address)

North Carolina

ZIP CODE

27106

TELEPHONE NUMBER (include area code)

(336) 759-0363

CALL LETTERS

WPET

OTHER FCC IDENTIFIER (If applicable)

71271

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

☐

Governmental Entity

☐

Noncommercial educational licensee

☒

Other (Please explain): Direct Measurement

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		

(B)

FEE MULTIPLE			
0	0	0	1

(C)

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

FOR FCC USE ONLY

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

(A)

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(B)

0	0	0	1
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(C)

\$
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FOR FCC USE ONLY

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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

\$

FOR FCC USE ONLY

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SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Truth Broadcasting Corporation		
MAILING ADDRESS 4405 Providence Lane, Suite D		
CITY Winston-Salem	STATE North Carolina	ZIP CODE 27106

2. This application is for:

- ☒ Commercial
 ☐ Noncommercial  
☐ AM Directional
 ☒ AM Non-Directional

Call letters WPET	Community of License Greensboro, NC	Construction Permit File No. N/A	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
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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

If No, explain in an Exhibit. Not Applicable

Exhibit No.

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

☐ Yes ☐ No

If No, state exceptions in an Exhibit. Not Applicable

Exhibit No.

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

☐ Yes ☐ No

If Yes, explain in an Exhibit. Not Applicable

Exhibit No.

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

If No, explain in an Exhibit.

☒ Does not apply

Exhibit No.

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

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.

Exhibit No.

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).

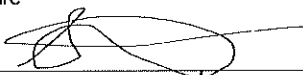
The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

### 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 Stuart W. Epperson, Jr.	Signature 	
Title President	Date 7-13-21	Telephone Number (336) 759-0363

**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**

### 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.

**SECTION III - LICENSE APPLICATION ENGINEERING DATA**

Name of Applicant

**Truth Broadcasting Corporation**

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	
<b>WPET</b>		<b>950</b>	<b>Daytime with secondary nighttime</b>	Night <b>0.54</b>	Day <b>0.041</b>

## 2. Station location

State <b>North Carolina</b>	City or Town <b>Greensboro</b>
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## 3. Transmitter location

State <b>NC</b>	County <b>Guilford</b>	City or Town <b>Greensboro</b>	Street address (or other identification) <b>South Eugene Street</b>
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## 4. Main studio location

State <b>NC</b>	County <b>Forsyth</b>	City or Town <b>Winston-Salem</b>	Street address (or other identification) <b>4405 Providence Lane, Suite D</b>
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## 5. Remote control point location (specify only if authorized directional antenna)

State	County	City or Town	Street address (or other identification)
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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.

## 8. Operating constants:

RF common point or antenna current (in amperes) without modulation for night system <b>0.45</b>	RF common point or antenna current (in amperes) without modulation for day system <b>1.60</b>
Measured antenna or common point resistance (in ohms) at operating frequency Night <b>200.28</b> Day <b>200.28</b>	Measured antenna or common point reactance (in ohms) at operating frequency Night <b>+j 488.03</b> Day <b>+j 488.03</b>

## Antenna indications for directional operation

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day

Manufacturer and type of antenna monitor:

SECTION III - Page 2

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

Type Radiator  6-WIRE SKIRT	Overall height in meters of radiator above base insulator, or above base, if grounded.  80.8	Overall height in meters above ground (without obstruction lighting)  81.4	Overall height in meters above ground (include obstruction lighting)  81.4	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. For single vertical radiator give tower location.

North Latitude 36 ° 03 ' 42 "	West Longitude 79 ° 47 ' 35 "
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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.

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

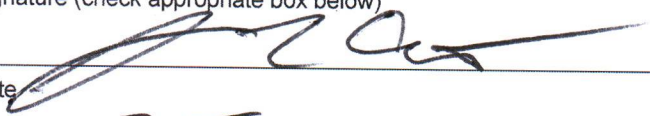
N/A

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

Triplexing with WEAL(AM), Greensboro, NC (Facility ID No. 71271), and

WKEW(AM), Greensboro, NC (Facility ID No. 73156) (See Exhibit 1)

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Joshua M. Arrit	Signature (check appropriate box below) 
Address (include ZIP Code) Radio Cardinal Communication Service 1918 Upper Craigs Creek Road Catawba, VA 24070	Date 2 Jun 2021
	Telephone No. (Include Area Code) (540) 765-8501

☐ Technical Director

☐ Registered Professional Engineer

☐ Chief Operator

☒ Technical Consultant

☐ Other (specify)

**Exhibit 1**



# **Technical Report**

# **WPET(AM)**

**Facility ID 71271**

**950kHz Greensboro, NC**

**0.54kW ND2 U**

## **Direct Measurement**

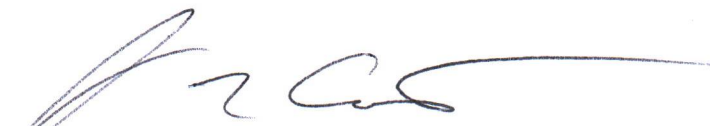
**Prepared for  
Mandel Owens, Chief Engineer  
Truth Broadcasting Corporation  
20 May 2021**



**WPET(AM), FACILITY ID 71271, FINAL IMPEDANCE ACROSS CHANNEL, TABULAR**

<i>Freq. (kHz)</i>	<i>Resistance (Ohms)</i>	<i>Reactance (Ohms)</i>
930	117.51	+j 319.25
935	146.05	+j 376.45
940	163.59	+j 405.97
945	180.58	+j 444.07
<b>950</b>	<b>200.28</b>	<b>+j 488.03</b>
955	225.22	+j 543.65
960	247.72	+j 607.92
965	295.28	+j 680.21
970	359.11	+j 773.43

All measurements were taken 20 May 2020, between 5:00PM and 6:00PM EDT. WX was fair, approx 85F, with no wind. Measurement point was at the ATU output terminal 1P3, ahead of the reject filters for WKEW(AM) and WEAL(AM). Measurements were taken with an Array Solutions PowerAIM120 VNA, S/N 1201.



- Joshua M. Arritt

**Technical Report**  
**WKEW(AM)**

**Facility ID 73156**  
**1400kHz Greensboro, NC**

**0.76kW ND2 U**  
**Direct Measurement**

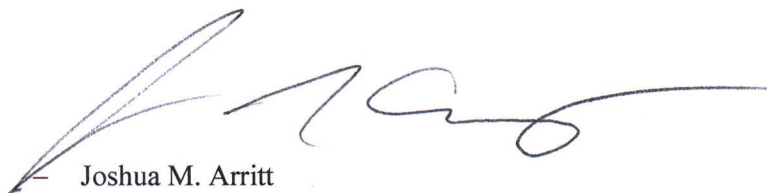
**Prepared for**  
**Mandel Owens, Chief Engineer**  
**Truth Broadcasting Corporation**  
**20 May 2021**



**WKEW(AM), FACILITY ID 73156, FINAL IMPEDANCE ACROSS CHANNEL, TABULAR**

<i>Freq. (kHz)</i>	<i>Resistance (Ohms)</i>	<i>Reactance (Ohms)</i>
1380	41.75	-j 249.03
1385	37.75	-j 229.91
1390	34.64	-j 210.80
1395	31.64	-j 192.82
<b>1400</b>	<b>28.84</b>	<b>-j 175.08</b>
1405	26.29	-j 156.36
1410	24.43	-j 137.84
1415	22.04	-j 118.97
1420	20.77	-j 98.65

All measurements were taken 20 May 2020, between 5:00PM and 6:00PM EDT. WX was fair, approx 85F, with no wind. Measurement point was at the ATU output terminal J108, ahead of the reject filters for WEAL(AM) and WPET(AM). Measurements were taken with an Array Solutions PowerAIM120 VNA, S/N 1201.



Joshua M. Arritt

Owner, Radio Cardinal Communication Service