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MEMORANDUM

To: James Hughes, MD
Via e-mail attachment

Date: May 25, 2017

From: Ronald D. Rackley

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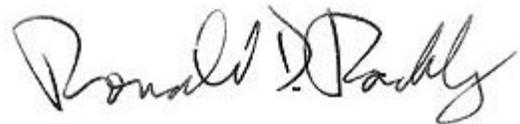
Re: WIWT-LP CP Condition 1

You have asked me to review the WIWT-LP construction permit with regard to meeting the requirement of its special condition 1 for studying the potential impact on nearby AM radio station WSFZ. WZFZ operates on 930 kilohertz. The WIWT-LP and WSFZ transmitter sites are 1.3 kilometers apart. The newly constructed WIWT-LP tower is 49 meters tall. Because of a change in the license of WSFZ following the issuance of the WIWT-LP construction permit, no studies are needed to meet the requirements of the FCC Rules.

The WIWT-LP construction permit, file number BMPL-20160713ABJ, was granted on July 21, 2016. Subsequent to that, WSFZ, which had been formerly licensed to use a multi-tower directional antenna, became licensed as a nondirectional AM station when its application for license, file number BL-20161219ADN, was granted on February 3, 2017. The requirements pertinent to this situation are contained in 47 CFR 1.30002(a), which states that a specific study is required for new construction of a tower taller than 60 electrical degrees and located within one wavelength at the nondirectional AM station's frequency. As the new tower is 54.7 electrical degrees in height and located 4.03 wavelengths away from WSFZ, no such study is required. The construction permit condition was based on the former WSFZ directional operation and is no longer applicable.

It is noteworthy that the other two AM stations that share the WSFZ transmitter site, WIIN on 780 kilohertz and WOAD on 1300 kilohertz, are located 3.38 wavelengths and 5.64 wavelengths from the WIWT-LP tower on their frequencies, respectively. They do not require studies based on their wavelength distances.

Sincerely,



Ronald D. Rackley, P.E.