

Exhibit 13 – Statement A
Application for Construction Permit
WZHF Capitol Heights, Maryland (FCC Facility ID 73306)
1390 kHz 9 kW – D 1 kW – N DA-2
Prepared November 2013 for
Way Broadcasting Licensee, LLC

Nature of the Proposal

Way Broadcasting Licensee, LLC (“*Way*”) is the licensee of Standard Broadcast Station WZHF, 1390 kHz, Arlington, Virginia (FCC Facility ID 73306). WZHF is presently licensed to operate with 5 kW during daytime and nighttime hours, using a pair of directional antenna systems, at a site located in Falls Church, Virginia. This site is shared with the licensee of WUST¹, *New World Radio, Inc.* (“*New World*”) in a diplexed configuration.

Way and *New World* have been informed by the current transmitter site landlord that the site lease will not be renewed when it expires in the early half of next year. Accordingly, *Way* and *New World* have conducted an exhaustive search for plausible replacement sites and, in particular, existing broadcast sites, which would not require significant new construction activity.

Of all the locations evaluated, the site identified herein, which is the existing transmitter site of Station WJFK(AM)², is believed to be the best suited available location for both of these facilities and can readily and quickly accommodate the addition of the stations without the need for physical tower construction or material changes to the site. Accordingly, *Way* herein seeks authority to relocate the WZHF transmitting operation to the WJFK site.

Due to allocation considerations discussed elsewhere in this application, *Way* proposes to operate WZHF with 9 kW during daytime hours, and 1 kW during nighttime hours. This will be accomplished with two different antenna patterns, achieved by using the existing WJFK antenna towers.

No new tower construction will be required, and no physical changes will be made to the existing WJFK towers in order to accommodate the proposed triplexed operation of WZHF, WJFK and WUST. *New World* has already proposed the use of this site for WUST in an application now pending before the FCC (see FCC File number BP-20130926BCX).

As will be discussed elsewhere in this application, due to the distance from the present WZHF site, daytime and nighttime allocations constraints, measured soil conductivity, and the FCC’s present principal community coverage requirements, it is not possible to retain Arlington, Virginia as the WZHF community of license. Accordingly, *Way* is herein proposing a replacement community of license, Capitol Heights, Maryland, which is also within the “Washington DC – VA – MD Urbanized Area”.

¹ WUST operates on 1120 kHz and is licensed to Washington, DC. The station’s FCC Facility ID number is 48686.

² WJFK operates on 1580 kHz, and is licensed to Morningside, Maryland. (See FCC Facility ID 28638, FCC File Number BMML-20100602AKU.)

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Inasmuch as this proposal's daytime facilities are mutually exclusive with the current WZHF daytime facilities, it is believed that this change may be characterized as a minor change, pursuant to §73.3571(a)(1) of the Commission's Rules.

Proposed Antenna Systems

The antenna system designs for the proposed daytime and nighttime WZHF operation utilizes the existing four WJFK towers. The proposed 9 kW daytime design is described in the attached Exhibit 13 - **Table I**. A tabulation of the resulting standard radiation pattern data is included in this table. A horizontal plane polar plot of this pattern data is supplied as **Exhibit 13 - Figure 1**.

The proposed 1 kW nighttime design is described in the attached **Exhibit 13 -Table II**. A tabulation of the resulting standard radiation pattern data is included in this table. Tabulations and plots of radiated fields at various elevation angles are not included in this application material for purposes of brevity, but can be provided upon request. A horizontal plane polar plot of this pattern data is supplied as **Exhibit 13 - Figure 2**.

Information regarding the proposed site location is provided in the attached **Exhibit 13 - Figure 3** (site location topo map) and **Exhibit 13 - Figure 4** (site photographs). **Exhibit 13 - Figure 5** describes the proposed ground system and includes a property plat outline along with a representative tower elevation plan. The existing ground system at this site will be refurbished and reconstructed as described in **Figure 5** and in the following paragraph. The refurbished system will provide radials that are 111.9 electrical degrees in length at the WZHF frequency. The specifics of the ground system are as follows:

The WZHF ground system will consist of 120 buried radial wires (#10 AWG – soft drawn copper) equally spaced at 3 degree intervals around each tower base, 220 feet (67.1 m or 111.9° at 1390 kHz) in length, except where foreshortened and terminated to transverse copper straps (0.032 inch by 4 inch). An additional 120 radials, each 50 feet (15.2 m or 25.4° at 1390 kHz) in length, shall be interspersed between the longer radials. Additional copper strap (0.023 by 4 inches) shall be buried between the towers.

Tower structure height information used in this application was obtained from WJFK station records, as contained in File No. BMML-20100602AKU. Referencing that data, each antenna structure is 47.46 meters above the base insulator, yielding a radiating (electrical) height of 79.22° at 1390 kHz. These existing towers are uniform cross section, base insulated, guyed lattice steel structures, and are 48.46 meters in overall height. The tower closest to the transmitter building, Tower 3, has a microwave antenna installed near its top. A representative tower elevation sketch is included on **Exhibit 13 - Figure 5**. Antenna Structure Registration has not been required for these existing structures.

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Blanketing Considerations

FCC Rule Section 73.24(g) requires that the population within the 1,000 mV/m contour not exceed one percent of the population within the 25 mV/m contour. In order to determine this proposal's compliance with this rule section, the locations of the predicted existing and proposed 1000 mV/m (1 V/m) "blanketing contours" were calculated and plotted on the maps attached as **Exhibit 13 - Figure 6** and **6A**. **Figure 6A** provides a closer view of the locations of the proposed daytime and nighttime blanketing contours. **Exhibit 13 - Figure 7** shows the location of the existing and proposed 25 mV/m contours.

According to 2010 U.S. Census data, it is estimated that 2228 persons reside in the proposed WZHF daytime 1 V/m (1000 mV/m) contour, while 443,592 persons reside within the proposed daytime 25 mV/m contour. The population encompassed by the 1 V/m contour thus represents 0.5% of the 25 mV/m population, which is less than the one percent threshold specified in Section 73.24(g). Additionally, 25 persons are estimated to reside in the proposed WZHF nighttime 1 V/m contour, thus meeting the 300 person (or fewer) exclusion criteria of §73.24(g) for that mode of operation. As such, the daytime and nighttime facilities proposed herein satisfy the Commission's rules regarding blanketing contours. Nevertheless, *Way* recognizes its responsibility to correct any consequential blanketing problems as required under Section 73.88 of the Rules, as they have customarily have done with other radio stations licensed to the group.

Coverage Predictions

Pertinent coverage contours are provided in the attached **Exhibit 13 - Figures 6, 7, 8** and **9**. Theoretical (FCC Figure M-3) conductivity boundaries are shown on these maps and are identified where pertinent. The customary groundwave interfering (0.025, 0.25, 5, and 25 mV/m) contours are shown on the allocations maps in a following exhibit. All contour predictions and plots were derived using the FCC's standard prediction methods. In particular, all distances to contours were derived using a computer program that simulates the Commission's AM groundwave propagation curves. No tabulation is provided herewith for the distance to contour locations; however if such a tabulation is desired by Commission Staff, it can be supplied upon request.

Soil conductivity data used for contour prediction purposes were taken from:

- a digitized version of the Commission's estimated soil conductivity map, Figure R-3 (M-3),
- "measured" ground conductivities obtained from the last conventional "full" proof-of-performance conducted at the existing site for WJFK,

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- Measured conductivity for the licensed WZHF site using the WZHF (formerly WMZQ) proof-of-performance files, and other measurement data taken on this site, and
- Conductivity taken from the available files last full proofs for co-channel Stations WRSC, WLAN and WKLP, first-adjacent channel Station WBTK, and second-adjacent Station WQLL.

A reference summary of the employed measured ground conductivity data is included as **Exhibit 13 - Appendix A**.

For the convenience of Commission Staff duplicate copies of the available underlying proof measurement graphs and measurement tabulations are included as **Exhibit 13 - Appendix B**.