

**CORRECTION OF DIRECTIONAL TABULATION**  
**WXTU LICENSE LIMITED PARTNERSHIP**  
**WXTU (FM) RADIO STATION**  
**CH 223B - 92.5 MHZ - 15.0 KW**  
**PHILADELPHIA, PENNSYLVANIA**  
**February 2004**

**TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of WXTU License Limited Partnership (“WLLP”), licensee of station WXTU, Channel 223B, Philadelphia, Pennsylvania. WLLP is operating WXTU under program test with the facilities authorized in BPH-20000630AEI. During the review of the license application (BLH-20031205AXO), the Commission’s staff contacted the engineering counsel of WLLP requesting a tabulation of the horizontal and vertical measured pattern of the operating WXTU antenna system in ten degree increments.<sup>1</sup> To assist the staff in completing the processing of the license application and using the limited data available on the WXTU antenna system, a ten degree tabulation was calculated, based on the pattern available from the manufacturer (as submitted in BLH-20031205AXO).

However, in preparing the tabulations, it became apparent that the 310° azimuth of the pattern was higher than the value reflected in the Commission’s CDBS database for the license authorized in BLH-19860325KC (which was the same as that proposed in BLH-20031205AXO).

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1) The operating WXTU antenna is the same system as authorized in BLH-19860325KC, with no actual changes. In BPH-20000630AEI, WLLP altered the directional envelope pattern for WXTU pursuant to a mutual increase of facilities agreement with station WVLT, Vineland, New Jersey. The operating WXTU antenna system fits within the updated envelope pattern and, as such, no actual change to the operating antenna was proposed. However, the WXTU antenna documentation submitted with BLH-19860325KC, and again with BLH-20031205AXO, included a horizontal and vertical pattern tabulation in 15° increments.

The 310° azimuth was originally extracted from the CDBS and was relied upon in the preparation of BPH-20000630AEI. There was no reason to believe there were any issues involving the previously authorized measured pattern.

The actual relative field of the horizontal polarization at 310° is 0.750. The field of the vertical polarization at 310° is 0.810. The CDBS record for this azimuth indicates a field of 0.640 (which would normally be the higher of the two values). It is readily apparent, in a review of both the horizontal and vertical measured patterns, which are attached hereto as Exhibit A1 and A2, that between 300° and 315° the fields of both polarizations are rising (see Exhibit A3). Yet the CDBS database reflects a field at 310° which is less than the value at 300° for the vertical polarization and just slightly higher than the horizontal polarization at 300°. A review of the Commission's files and discussions with the staff could find no explanation for this anomaly. Therefore, we believe that, since there was no originally submitted data in the 1986 license application for the 310° azimuth, this value was arrived at by some interpolation, which did not accurately reflect the antenna pattern.

Since the actual value exceeds the CDBS envelope pattern dating back to the 1986 application, the Commission's staff suggested the submission of a minor change application to correct the pattern to reflect the actual relative field. As such, this instant application is being submitted. No actual change to the station or the antenna is proposed, nor is any actual

construction required. Attached, as Exhibits A4 through A13, are the updated directional antenna data for the envelope pattern, as well as the horizontal and vertical polarizations, in ten degree increments. This data will also be used to amend BLH-20031205AXO.

Since WLLP is specifying the present WXTU site, the Federal Aviation Administration has not been apprised of this proposal. The tower has been registered with the FCC and assigned Antenna Structure Registration #1026755. At the authorized WXTU site, Channel 223B does not meet §73.207 spacing requirements to several facilities (see Exhibit B for details and §73.213 compliance). Further, since the proposed location is shared with many other FM and TV facilities, a radio frequency radiation compliance statement is attached as Exhibit C.<sup>2</sup> All of the remaining exhibits used to certify the information on Form 301 have been forwarded to WLLP and are available for submission to the Commission on request.

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2) It is noted there is a lone AM directional station WNWR, which is within 2.0 miles of this proposed site. Since the tower on which the antenna is presently located has been in existence for many years, WNWR will not be impacted by this instant proposal. It is requested that no pre- or post measurement conditions be placed on the herein requested construction permit.