

ENGINEERING STATEMENT  
RE AMENDMENT TO  
MINOR CHANGE APPLICATION BP-20071120AIJ  
TO INCREASE DAYTIME POWER  
**WPEN, PHILADELPHIA, PENNSYLVANIA**  
950 kHz 43 kW D/21 kW N DA-2  
MARCH 2008

This engineering statement has been prepared on behalf of Greater Philadelphia Radio, Inc., (“GPR”) licensee of AM radio station WPEN, Philadelphia, Pennsylvania and is in support of an amendment to the minor change application (BP-20071120AIJ) to increase daytime power.

At present WPEN operates on 950 kHz unlimited time with 25 kW power during day and 21 kW power at night. WPEN utilizes a three tower directional antenna during daytime and a four tower directional antenna during nighttime from a separate site.

WPEN is amending its pending application (BP-20071120AIJ) and is now proposing to increase its daytime power at the current licensed daytime site for operation on 950 kHz with 43 kW using the existing three-tower directional antenna system. No change in the nighttime operation is proposed.

The proposed WPEN facility fully complies with the Commission’s rules by protecting existing stations and earlier filed applications. WPEN also complies with principal city coverage requirements during daytime. The attached Exhibits 11-15, 18 and 20 demonstrate the full compliance of the Commission’s rules.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

24 March 2007

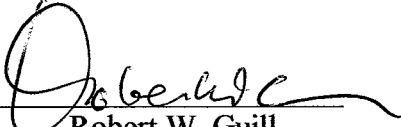
  
Robert W. Guill  
Technical Consultant

EXHIBIT 11 AMENDED  
BROADCAST FACILITY  
WPEN, PHILADELPHIA, PENNSYLVANIA  
950 kHz 43 kW D/21 KW N DA-2  
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**Section 73.24(e)**

The proposed technical equipment, location of the transmitter and technical phases of operation will be according to the Commission's rules and requirements of good engineering practice.

**Section 73.24(g)**

The attached Figure 1 shows the present and proposed daytime WPEN 1 V/m contours. The estimated population within the computed proposed 1 V/m contour is 50,735 people based on the 2000 US Census Data. This represents 2.2% of the population within the proposed 25 mV/m contour (2,300,518 people). Since WPEN currently operates with 25 kW daytime without any problem, it is believed that the proposed 43 kW operation would not result in any significant interference problems within the proposed blanketing area. However, should a problem occur, WPEN will take full responsibility to satisfy all reasonable complaints of blanketing interference within the proposed daytime 1 V/m contour. WPEN will comply with the blanketing requirements in accordance with Section 73.88 and 73.318 (b) and (d) of the Commission's Rules. The remedial steps may include installation of filters, traps or receiver replacement in accordance with Section 73.88. The proposed 43 kW daytime operation of WPEN will better serve the Philadelphia area and reduce daytime interference to other stations. Accordingly, it is believed that the requested 2.2% population figure within the

blanketing contour is in the public interest. However, a waiver of Section 73.24(g) of the Commission's Rules is requested if it is deemed necessary.

**Section 73.33**

The proposed WPEN operation on 950 kHz would be from its licensed daytime site. The details of the directional daytime antenna system are provided in Exhibit 20 - Amended.

Station WPEN will provide a complete directional antenna proof-of-performance with its application for license.

**Section 73.45**

The efficiency of the proposed daytime directional antenna system is greater than 282 mV/m at one kilometer for 1 kW. The proposed station will utilize the present licensed site which was built according to good engineering practices and achieved the antenna efficiency.

**Section 73.150**

The details of the proposed 43 kW directional daytime antenna system are provided in Exhibit 20 - Amended.

**Section 73.152**

Not applicable

**Section 73.160**

Not applicable

**Section 73.182(a)-(i)**

Not applicable

**Section 73.186**

Not applicable

**Section 73.189**

The proposed daytime directional antenna system complies with the minimum efficiency requirement for 43 kW power.

**Section 73.1650**

The proposed WPEN operation on 950 kHz would be in compliance of all International agreements.