



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
WCSO(FM), SOUTHAMPTON, NEW YORK
CHANNEL 225A, 2.75 kW ERP, 149 M HAAT
FACILITY ID. 52059**

Licensee: Peconic Bay Broadcasting Corporation

I am a Radio Engineer in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Inspiration Media of New York, LLC, licensee of FM broadcast station WCSO(FM), Southampton, New York, to prepare this statement, FCC Form 301 Section III-B and associated exhibits in support of an Application for Modification of Construction Permit Number BPH-19920928MM. This application is necessary because tower space is no longer available for the transmitter site authorized in the outstanding WCSO(FM) construction permit.

ALLOCATION CONSIDERATIONS

The proposed WCSO(FM) transmitter site is fully-spaced to all current allocations, licensed broadcast facilities, outstanding construction permits, and pending applications with

the exception of a 2.42 kilometer short-spacing to cochannel Class B station WBOS(FM), Brookline, Massachusetts. It is submitted that this short-spacing is permitted under Section 73.215 of the FCC Rules and satisfies the minimum distance spacing requirement set forth in Section 73.215(e).

Exhibit 1 depicts the proposed WCSO(FM) protected and interfering contours as well as the protected and interfering contours resulting from a maximum Class B facility at WBOS(FM). As shown in Exhibit 1, no overlap will be caused or received as a result of the instant proposal.

In light of the above, the instant proposal satisfies the FCC's allocation considerations with respect to all pertinent cochannel and adjacent channel allotments, assignments and applications.

TECHNICAL FACILITIES

The applicant proposes to side mount a new 2-bay, full-wavelength spaced nondirectional transmitting antenna on an existing support structure such that the overall height of the support structure is not altered. A type-accepted transmitter of adequate power for the required Transmitter Power Output (TPO) will be used.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.313 of the Rules utilizing the appropriate F(50,50) propagation curves from the Rules (Section 73.333, Figure 1), effective radiated power, and antenna height above average terrain as determined for each profile radial. Average terrain data from the proposed site was obtained from a National Geophysical Data Center Thirty Second Point Topographic Database (TGP-0050). No change in the antenna height above average terrain is proposed herein. The 3.16 mV/m (70 dBu) city-grade contour completely encompasses the principal community to be served, as required by Section 73.315(a) of the Commission's Rules.

BLANKETING AND INTERMODULATION INTERFERENCE

There are five licensed full-service FM stations located within 10 kilometers of the proposed antenna location. These stations are: WRLI-FM and WHFM, both licensed to Southampton, NY; WLNG(FM), Sag Harbor, NY; WBEA(FM), Southold, NY; and, WBAZ(FM), Bridgehampton, NY. In the event that blanketing interference occurs as a result of this proposal to these facilities or any facilities which have not been identified, the applicant will take appropriate steps to minimize the interference within the blanketing contour in accordance with FCC rules.

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Pursuant to the Commission's January 2, 1991 decision (FCC 91-3, released January 14, 1991) regarding the application of WKLX, Inc., the applicant will exclude both mobile and battery-powered receivers from Receiver Induced Third Order Intermodulation and Blanketing Interference Resolution Requirements. In the event any type of intermodulation interference (including receiver induced) occurs with any other facilities which have not been identified, the applicant will take appropriate steps (i.e., install and maintain traps or filters) to minimize the interference in fixed receivers. The applicant will respond to complaints of blanketing interference for a period of one year in compliance with Section 73.318(b) of the Commission's Rules.

FAA NOTIFICATION AND FCC TOWER REGISTRATION

The applicant proposes no change in the overall height of the existing support structure. The tower's FCC registration number is 1014849.

ENVIRONMENTAL CONSIDERATIONS

RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The current guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National

Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or “controlled” situations, as well as “uncontrolled” situations that apply in cases that affect the general public. The FCC’s Office of Engineering and Technology (OET) Commission issued a technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997), to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The Bulletin contains updated and additional technical information for evaluating compliance with the current FCC policies and guidelines.

The current FCC MPE level for “uncontrolled” environments is 0.2 milliwatt per centimeter squared (mW/cm^2) or $200 \mu\text{W}/\text{cm}^2$ for FM facilities. The MPE level for FM facilities in a “controlled” environment is $1.0 \text{ mW}/\text{cm}^2$.

The WCSO(FM) facility will operate with a circularly polarized, maximum ERP of 2.75 kW from a new directional transmitting antenna with a centerline height of 79 meters AGL. Based on worst-case calculations, WCSO(FM) is predicted to produce a maximum power density at two meters above ground level of $31 \mu\text{W}/\text{cm}^2$ which is only 15.5% of the FCC guideline value for “uncontrolled” environments.

OCCUPATIONAL SAFETY

Based on the calculations discussed above, WCSO(FM) is predicted to produce a power density which is 3.1% of the FCC guideline value for "controlled" environments. The applicant will insure the protection of station personnel or tower contractors working in the vicinity of the proposed transmitting antenna. The applicant will reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Section III-B, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

Signed: *William J. Getz*
Carl T. Jones Corporation
August 16, 2001