



2400 Market Street, 4th Floor, Philadelphia, PA 19103

Laura Berman
Senior Counsel

May 7, 2020

via EMAIL

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554
Attn: Audio Division, Media Bureau
james.bradshaw@fcc.gov
nazifa.sawez@fcc.gov

Re: WQAM(AM), Miami, Florida (FIN 64002)
FCC Form 302-AM
License to Cover FCC File No. BP-20191220AAA

Dear Ms. Dortch:

Entercom License, LLC ("Entercom"), licensee of WQAM(AM), Miami, Florida (FIN 64002), hereby submits an application on Form 302-AM to cover the above-referenced construction permit. In accordance with the instructions set forth in *Audio Division Announces Procedures Related to Coronavirus*, Public Notice, DA 20-266 (rel. Mar. 13, 2020), Entercom is submitting this application via email. The filing fee for the application was paid via Fee Filer. Enclosed is the Form 159 for the payment of the fee.

Please contact me if there are any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Berman", with a long horizontal flourish extending to the right.

Laura Berman

Enclosures

ETM:117653

Entercom Communications Corp.

Voice: (484) 270-6312 • Fax (610) 660-5662 • www.entercom.com • laura.berman@entercom.com

Agency Tracking ID:PGC3391090 Authorization Number:041654

Successful Authorization -- Date Paid: 5/7/20

FILE COPY ONLY!!

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE FORM 159 PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
SECTION A - Payer Information		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Entercom License, LLC		(3) TOTAL AMOUNT PAID (dollars and cents) \$725.00
(4) STREET ADDRESS LINE NO. 1 2400 Market Street		
(5) STREET ADDRESS LINE NO. 2 4th Floor		
(6) CITY Philadelphia	(7) STATE PA	(8) ZIP CODE 19103
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 484-2706312		(10) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(11) PAYER (FRN) 0004434866	(12) FCC USE ONLY	
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)		
(13) APPLICANT NAME Entercom License, LLC		
(14) STREET ADDRESS LINE NO. 1 2400 Market Street		
(15) STREET ADDRESS LINE NO. 2 4th Floor		
(16) CITY Philadelphia	(17) STATE PA	(18) ZIP CODE 19103
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 484-2706312		(20) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(21) APPLICANT (FRN) 0004434866	(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET		
(23A) FCC Call Sign/Other ID WQAM	(24A) Payment Type Code(PTC) MMR	(25A) Quantity 1
(26A) Fee Due for (PTC) \$725.00	(27A) Total Fee \$725.00	FCC Use Only
(28A) FCC CODE 1 64002	(29A) FCC CODE 2 WQAM-FCCForm302AM	
(23B) FCC Call Sign/Other ID	(24B) Payment Type Code(PTC)	(25B) Quantity
(26B) Fee Due for (PTC)	(27B) Total Fee	FCC Use Only
(28B) FCC CODE 1	(29B) FCC CODE 2	

FOR
FCC
USE
ONLY

FCC 302-AM
APPLICATION FOR AM
BROADCAST STATION LICENSE

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

SECTION I - APPLICANT FEE INFORMATION

1. PAYOR NAME (Last, First, Middle Initial)

ENTERCOM COMMUNICATIONS CORP.

MAILING ADDRESS (Line 1) (Maximum 35 characters)

2400 Market Street, 4th Floor

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

Philadelphia

STATE OR COUNTRY (if foreign address)

PA

ZIP CODE

19103

TELEPHONE NUMBER (include area code)

610-660-5610

CALL LETTERS

WQAM

OTHER FCC IDENTIFIER (If applicable)

64002

2. A. Is a fee submitted with this application?



Yes



No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section



Governmental Entity



Noncommercial educational licensee



Other (Please explain):

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)

FEE TYPE CODE		
M	M	R

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$ 725

FOR FCC USE ONLY

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)

--	--	--

(B)

0	0	0	1
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(C)

\$

FOR FCC USE ONLY

ADD ALL AMOUNTS SHOWN IN COLUMN C,
AND ENTER THE TOTAL HERE.
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED
REMITTANCE.

TOTAL AMOUNT
REMITTED WITH THIS
APPLICATION

\$ 725

FOR FCC USE ONLY

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Entercom License, LLC		
MAILING ADDRESS 2400 Market Street, 4th Floor		
CITY Philadelphia	STATE PA	ZIP CODE 19103

2. This application is for:

- ☒ Commercial
 ☐ Noncommercial
☐ AM Directional
 ☒ AM Non-Directional

Call letters WQAM	Community of License MIAMI, FL	Construction Permit File No. BP-20191220AAA	Modification of Construction Permit File No(s).	Expiration Date of Last Construction Permit 03/13/2023
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

☒ Yes ☐ No

If No, explain in an Exhibit.

Exhibit No.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

☒ Yes ☐ No

If No, state exceptions in an Exhibit.

Exhibit No.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

☐ Yes ☒ No

If Yes, explain in an Exhibit.

Exhibit No.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

☐ Yes ☐ No

If No, explain in an Exhibit.

☒ Does not apply

Exhibit No.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☒ No

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

Exhibit No.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

☐ Yes ☒ No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).


The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

☒ Yes ☐ No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name John Kennedy	Signature 	
Title Vice President of Technical Operations	Date May 6, 2020	Telephone Number 484-270-6320

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant

Entercom License, LLC

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

☒

Station License

☐

Direct Measurement of Power

1. Facilities authorized in construction permit

Call Sign	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation	Power in kilowatts	
				Night	Day
WQAM	BP-20191220AAA	560	Unlimited	1.0	4.1

2. Station location

State Florida	City or Town Miami
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3. Transmitter location

State FL	County Miami-Dade	City or Town Miami	Street address (or other identification) 350 NE 71st Street
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4. Main studio location

State FL	County Miami-Dade	City or Town Miami	Street address (or other identification) 8300 NE 2nd Ave St 200
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5. Remote control point location (specify only if authorized directional antenna)

State	County	City or Town	Street address (or other identification)
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6. Has type-approved stereo generating equipment been installed?

☐

Yes

☒

No

7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?

☐

Yes

☐

No

☒

Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.

Exhibit No.
N/A**8. Operating constants: Power measured at transmitter output**

RF common point or antenna current (in amperes) without modulation for night system 4.47		RF common point or antenna current (in amperes) without modulation for day system 9.06	
Measured antenna or common point resistance (in ohms) at operating frequency Night 50 Day 50		Measured antenna or common point reactance (in ohms) at operating frequency Night 0 Day 0	

Antenna indications for directional operation

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day

Manufacturer and type of antenna monitor:

SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator Uniform cross-section guyed tower, top loaded	Overall height in meters of radiator above base insulator, or above base, if grounded. 61.1	Overall height in meters above ground (without obstruction lighting) 62.3	Overall height in meters above ground (include obstruction lighting) 63.2	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. <div>Exhibit No. 5</div>
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Excitation

☒

Series

☐

Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	25 [°]	50'	22"	West Longitude	80 [°]	11'	23"
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.
None


Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.
See Below

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

11. Give reasons for the change in antenna or common point resistance.

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Thomas S. Gorton	Signature (check appropriate box below) 
Address (include ZIP Code) Hatfield & Dawson Consulting Engineers 9500 Greenwood Ave N Seattle, WA 98103-3012	Date May 1, 2020
	Telephone No. (Include Area Code) (206) 783-9151

☐

Technical Director

☒

Registered Professional Engineer

☐

Chief Operator

☐

Technical Consultant

☐

Other (specify)

Top Loading Details – WQAM

Guy wire sections, 12.0 meters in length, are bonded to the top of the tower and connected at their lower ends with horizontal wires. The guy wires descend from the tower top at an angle of 33.7 degrees relative to the vertical tower axis, corresponding to a horizontal plane guy anchor radius of 2/3 the tower height. The top loading wire dimensions were calculated to result in 14.3 electrical degrees of top loading using moment method modeling. The tower is 41.0 electrical degrees in height at 1450 kilohertz. The effective top loaded height is 41.0 electrical degrees + 14.3 electrical degrees, which is 55.3 electrical degrees. The details of the design and current distribution modeling were presented in the technical section of the application for construction permit for this facility, file number BP-20140924ACZ, and were approved upon the construction permit grant. The tower and its arrangement of guy wire sections that add top loading were constructed in accordance with the design in every respect.

APPLICATION FOR AUXILIARY ANTENNA LICENSE
INFORMATION
RADIO STATION WQAM
MIAMI, FLORIDA

August 3, 2018

560 KHZ 4.1 KW - D 1.0 KW - N U

APPLICATION FOR AUXILIARY ANTENNA LICENSE
INFORMATION
RADIO STATION WQAM
MIAMI, FLORIDA

560 KHZ 4.1 KW - D 1.0 KW - N U

Executive Summary

- | | |
|--------|---|
| Item 1 | Direct Measurement of Power |
| Item 2 | RFR Protection |
| Item 3 | Intermodulation Product Observations Involving
WQAM, WQVN and WOCN |
| Item 4 | Filters for Triplexing WQAM (560 kHz), WQVN (1360 kHz)
and WOCN (1450 kHz) and WQAM Antenna Resistance
Measurement Location |
| Item 5 | Top Loading Details |
| Item 6 | Measured Field Strength Data |
| Item 7 | Graphs of Measured Field Strength Data |
| Item 8 | Measured Nondirectional Horizontal Plane Radiation
Pattern |

Executive Summary - WQAM

This engineering exhibit supports an application for License to cover construction permit number BP-20140924ACZ for radio station WQAM in Miami, Florida. WQAM is licensed to operate fulltime on 560 kilohertz with 5 kilowatts in the daytime and 1 kilowatt at night. The construction permit authorizes a new transmitter site for operation with a daytime power level of 4.1 kilowatts and a nighttime power level of 1 kilowatt using a shared tower with radio stations WQVN on 1360 kilohertz and WOCN on 1450 kilohertz.

The site authorized by the construction permit will be licensed as an auxiliary antenna for WQAM. The main WQAM facility will remain at the present transmitter site.

The ground system differs from its description in the original application for construction permit: As constructed, it consists of 180 equally-spaced buried copper wire radials extending to the property boundaries with a 48 foot by 50 foot ground screen at the tower base.

The construction permit included a special condition requiring that a field strength measurement proof of performance be run on the antenna to demonstrate that its radiation efficiency meets the minimum requirements of the FCC Rules. The measurements show that the antenna, with 4.1 kilowatts input, produces the efficiency that was proposed for it in the original application for construction permit – which meets the requirements of the FCC Rules.

Information regarding direct measurement of power for the WQAM antenna is included herein. The construction permit conditions have been satisfied and WQAM may operate from the site shared with WQVN and WOCN site in compliance with the FCC Rules, as demonstrated by the included data.

A handwritten signature in black ink, reading "Ronald D. Rackley". The signature is fluid and cursive, with the first name "Ronald" being larger and more prominent than the last name "Rackley".

Ronald D. Rackley, P.E.
August 3, 2018

Direct Measurement of Power – WQAM

Antenna impedance measurements were made using a Delta Electronics OIB-3 Impedance Bridge at the J-plug adjacent to the filter unit's current meter that is used to determine operating power. Prior to its use, the calibration of the bridge was checked with a reference standard resistor and the indicated resistance was found to agree with the standard resistor within less than the rated accuracy of the instrument. The antenna impedance was adjusted to be $50.0 + j 0.0$ ohms at the WQAM carrier frequency, 560 kilohertz. For the daytime power of 4,100 watts, the antenna current is 9.06 amperes. For the nighttime power of 1,000 watts, the antenna current is 4.47 amperes.

RFR Protection - WQAM

The operation of WQAM, on 560 kHz, sharing the tower with co-located radio stations WQVN on 1360 kHz and WOCN on 1450 kHz, will not result in the exposure of workers or the general public to levels of radio frequency radiation in excess of the limits specified in 47 CFR 1.1310. A metal fence is in place around the tower base to restrict access to distances beyond those necessary to prevent electric and magnetic field exposure above their required maximum levels.

The fence restricts access to areas with fields that exceed the requirements of the Rules with all three stations operating at full power into the tower. Measurements were made to verify that the protection requirements are met with a Holiday Industries model HI-3002 broadband survey meter, using a model STE-02 probe for the electric field component and a model LFH-02 probe for the magnetic field component. The manufacturer's specified probe factors were applied to the meter readings. Observations were made at distances 20 centimeters or more from nearby conducting objects, following the procedures outlined in the FCC's "OET Bulletin 65, Edition 97-01."

At the WQAM carrier frequency, 560 kHz, the specified maximum electric and magnetic field values are 614 V/m and 1.63 A/m, respectively. At the WQVN carrier frequency, 1360 kHz, the specified maximum values are 606 V/m and 1.61 A/m. At the WOCN carrier frequency, 1450 kHz, the specified maximum values are 568 V/m and 1.51 A/m. For worst-case analysis, the 1450 KHz maximum specified values were used for comparison with the measured field levels with all three stations operating to determine compliance since they are lower than the values for the other frequencies. This provides a worst-case analysis without the need to separate out the individual frequency contributions to the measured field values.

Measurements were made with all three stations operating at full daytime power into the tower. No field levels in excess of the maximum values were found in any area outside the tower fence. The following were the highest observed field levels between ground and two meters above ground outside the tower base fence: 390 V/m and 0.49 A/m.

Intermodulation Product Observations Involving WQAM, WQVN and WOCN

The WQAM transmitter site is shared with stations WQVN on 1360 kHz and WOCN on 1450 kHz. Filters are employed in series at the tower base to isolate the antenna system equipment of the three stations from interaction and also in shunt at the antenna system inputs to isolate the transmitters from each other's signals. The most critical purpose of the filters is to avoid the production of spurious emissions through the development of intermodulation products of the three stations' frequencies.

Upon completion of final tuning of the new antenna system, with all three stations operating at full daytime power into the nondirectional antenna, a field strength meter was utilized to search for intermodulation products of the three stations operating at the transmitter site. The observations were made approximately 1.2 kilometer east of the transmitter site, on a paved pathway 50 feet east of the NE 71st Street entrance to Baywood Park. The location is clear of overhead wires and as clear of nearby reradiating objects as is practicable in the area.

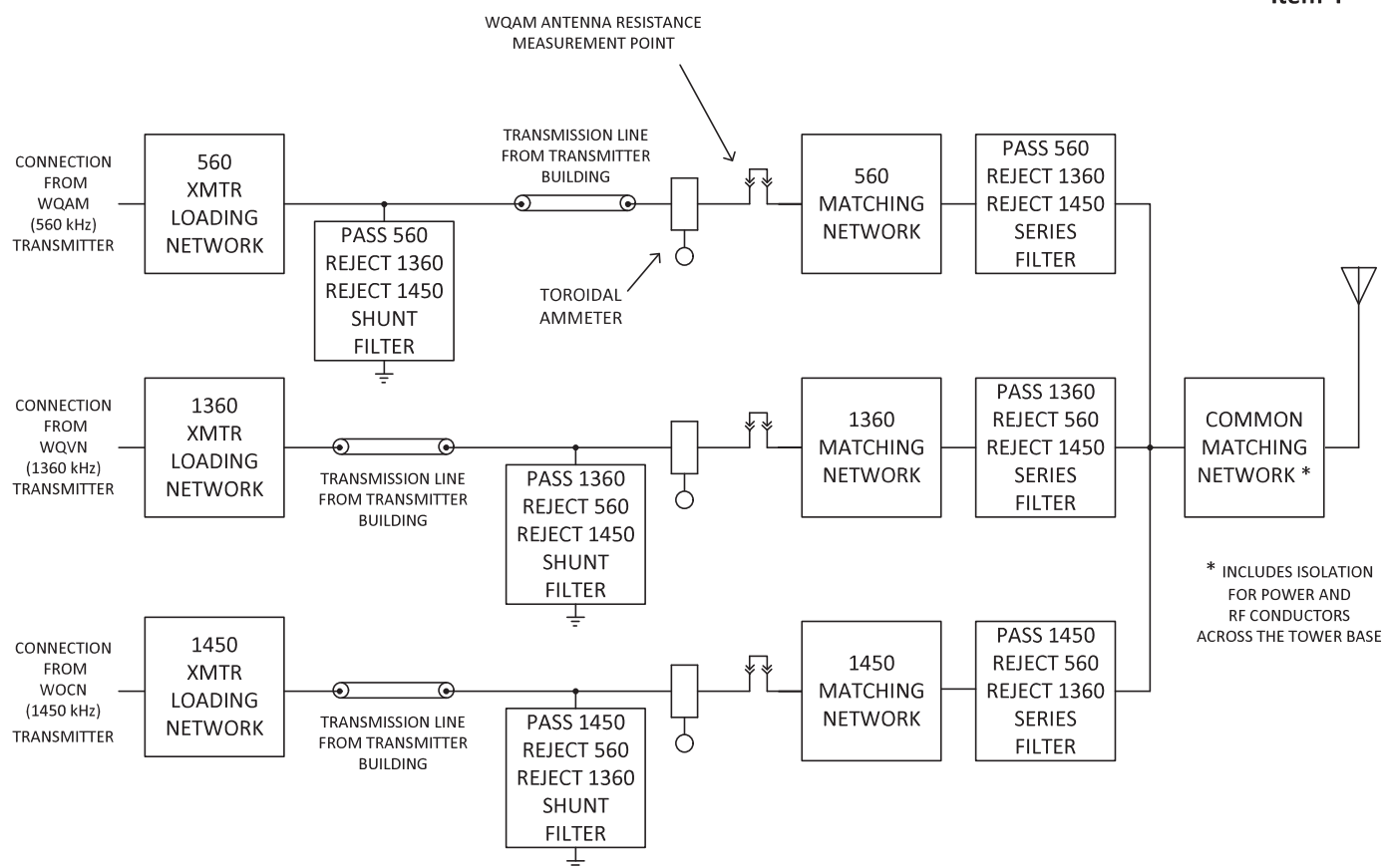
Observations were made at the three stations' carrier frequencies and at all second and third order intermodulation product frequencies involving WQAM and falling within the frequency range of the field strength meter. Signals that were found to be intermodulation products that may be generated in the transmitting equipment, coming from the direction of the transmitter site and carrying the modulation of one or more of the stations, were analyzed relative to the field strengths at their component carrier frequencies. The following tabulation shows the results of the intermodulation product observations.

WQAM INTERMODULATION PRODUCT OBSERVATIONS					
Frequency (KHz)	Product of Frequencies (KHz)	Field Strength (mV/m)	Relative to WQAM (dB)	Relative to WQVN (dB)	Relative to WOCN (dB)
560	WQAM Carrier	370	--	--	--
650	560 – 1360 + 1450	N/O	--	--	--
800	560 - 1360	N/O	--	--	--
890	560 - 1450	N/O	--	--	--
1360	WQVN Carrier	545	N/P	0.0	N/P
1450	WOCN Carrier	118	N/P	N/P	0.0
1920	560 + 1360	N/O	--	--	--
2010	560.+ 1450	N/O	--	--	--
2160	560 – 2 X 1360	N/O	--	--	--
2250	560 – 1360 - 1450	N/O	--	--	--
2340	560 – 2 X 1450	N/O	--	--	--
2480	2 X 560 + 1360	0.036	-80.2	-83.6	N/P
2570	2 X 560 + 1450	N/O	--	--	--
3280	560 + 2 X 1360	N/O	--	--	--
3370	560 + 1360 + 1450	N/O	--	--	--
3460	560 + 2 X 1450	N/O	--	--	--
N/O – None Observed					
N/P – Station frequency is not involved in this product.					

The field strength measurements were made with a Potomac Instruments FIM-41 field strength meter, serial number 1924. It was most recently calibrated by its manufacturer on September 26, 2016.

Section 73.44(b) of the FCC Rules specifies that emissions more than 75 KHz from carrier frequency must be at least 79.1 dB below the carrier level of 4.1 kilowatt station WQAM, 80 dB below the carrier level of 9.3 kilowatt station WQVN and 73 dB below the carrier level of 1.0 kilowatt station WOCN. There are no measured intermodulation products that exceed the required levels of suppression. The measurements indicate that the filtering equipment employed is functioning satisfactorily.

Item 4



* INCLUDES ISOLATION FOR POWER AND RF CONDUCTORS ACROSS THE TOWER BASE

du Treil, Lundin & Rackley, Inc.

Consulting Engineers
Sarasota, Florida USA

FILTERS FOR TRIPLEXING WQAM (560 kHz)
WITH WQVN (1360 kHz) AND WOCN (1450 kHz)
SHOWING ANTENNA RESISTANCE MEASUREMENT LOCATION

MIAMI, FLORIDA

Top Loading Details – WQAM

Guy wire sections, 12.0 meters in length, are bonded to the top of the tower and connected at their lower ends with horizontal wires. The guy wires descend from the tower top at an angle of 33.7 degrees relative to the vertical tower axis, corresponding to a horizontal plane guy anchor radius of 2/3 the tower height. The top loading wire dimensions were calculated to result in 14.3 electrical degrees of top loading using moment method modeling. The tower is 41.0 electrical degrees in height at 1450 kilohertz. The effective top loaded height is 41.0 electrical degrees + 14.3 electrical degrees, which is 55.3 electrical degrees. The details of the design and current distribution modeling were presented in the technical section of the application for construction permit for this facility, file number BP-20140924ACZ, and were approved upon the construction permit grant. The tower and its arrangement of guy wire sections that add top loading were constructed in accordance with the design in every respect.

Measured Field Strength Data – WQAM

In order to confirm the radiation efficiency of the WQAM antenna, as required by special condition five of the construction permit, field strength measurements were made in six equally-spaced radial directions around the transmitter site. The measurements were made at ground-accessible locations at distance intervals as close as was practicable to those specified in Section 73.186 of the FCC Rules.

The observed field strengths, the dates and times when they were measured, and their GPS coordinates are shown on the following pages.

WQAM 560 KHz. Miami, FL**4.1 KW ND. Day Antenna****12° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.67	580	N25° 50' 44.49"	W80° 11' 16.93"	12:51 PM
	2	0.92	640	N25° 50' 52.46"	W80° 11' 15.06"	12:59 PM
	3	1.11	470	N25° 50' 58.39"	W80° 11' 13.67"	1:11 PM
	4	1.33	420	N25° 51' 5.48"	W80° 11' 12.03"	1:16 PM
	5	1.77	270	N25° 51' 19.17"	W80° 11' 8.77"	1:25 PM
	6	1.96	310	N25° 51' 25.32"	W80° 11' 7.33"	1:31 PM
	7	2.27	150	N25° 51' 35.05"	W80° 11' 5.11"	1:39 PM
	8	2.61	185	N25° 51' 45.98"	W80° 11' 2.53"	1:43 PM
	9	2.85	165	N25° 51' 53.45"	W80° 11' 0.70"	1:48 PM
	10	3.13	170	N25° 52' 2.20"	W80° 10' 58.65"	1:54 PM
	11	3.93	125	N25° 52' 27.46"	W80° 10' 52.70"	2:02 PM
	12	4.93	122	N25° 52' 59.35"	W80° 10' 45.10"	2:09 PM
	13	7.00	64	N25° 54' 4.64"	W80° 10' 29.23"	2:19 PM
	14	8.97	69	N25° 55' 7.11"	W80° 10' 14.92"	2:29 PM
	15	11.04	45	N25° 56' 12.93"	W80° 09' 59.30"	3:08 PM
	16	12.97	41	N25° 57' 13.87"	W80° 09' 44.91"	2:18 PM
	17	15.01	28	N25° 58' 18.39"	W80° 09' 29.69"	3:48 PM

Measurements were made July 26, 2018 by George D. Butch using

Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

WQAM 560 KHz. Miami, FL**4.1 KW ND.****72° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.50	820	N25° 50' 28.27"	W80° 11' 4.99"	9:56 AM
	2	0.54	950	N25° 50' 28.58"	W80° 11' 3.83"	10:21 AM
	3	0.61	520	N25° 50' 29.39"	W80° 11' 1.07"	11:00 AM
	4	0.71	810	N25° 50' 30.34"	W80° 10' 57.68"	11:05 AM
	5	0.77	590	N25° 50' 30.94"	W80° 10' 55.83"	11:10 AM
	6	1.01	520	N25° 50' 33.36"	W80° 10' 47.51"	11:13 AM
	7	1.32	390	N25° 50' 36.48"	W80° 10' 36.90"	11:16 AM
	8	1.38	280	N25° 50' 37.07"	W80° 10' 34.78"	11:21 AM
	9	1.56	310	N25° 50' 38.81"	W80° 10' 28.81"	11:25 AM
	10	1.60	285	N25° 50' 39.23"	W80° 10' 27.34"	11:27 AM
	11	3.27	110	N25° 50' 55.94"	W80° 09' 30.34"	11:57 AM
	12	4.71	120	N25° 51' 10.48"	W80° 08' 41.03"	12:13 PM
	13	6.36	115	N25° 51' 26.88"	W80° 07' 44.63"	12:26 PM
	14	6.63	120	N25° 51' 29.72"	W80° 07' 35.24"	12:34 PM
	15	6.96	100	N25° 51' 32.94"	W80° 07' 24.01"	12:46 PM
	16	7.34	115	N25° 51' 36.73"	W80° 07' 10.95"	12:52 PM

Measurements were made July 23, 2018 by George D. Butch using

Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

WQAM 560 KHz. Miami, FL**4.1 KW ND.****132° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.40	610	N25° 50' 14.61"	W80° 11' 11.29"	3:00 PM
	2	0.54	600	N25° 50' 11.47"	W80° 11' 7.48"	2:54 PM
	3	0.66	590	N25° 50' 8.97"	W80° 11' 4.34"	2:49 PM
	4	0.72	585	N25° 50' 7.68"	W80° 11' 2.76"	2:45 PM
	5	0.80	620	N25° 50' 6.02"	W80° 11' 0.71"	2:43 PM
	6	0.96	390	N25° 50' 2.50"	W80° 10' 56.38"	2:39 PM
	7	1.08	475	N25° 50' 0.01"	W80° 10' 53.27"	2:35 PM
	8	1.16	550	N25° 49' 58.16"	W80° 10' 50.99"	2:27 PM
	9	4.84	110	N25° 48' 38.55"	W80° 09' 12.71"	2:09 PM
	10	5.84	110	N25° 48' 16.96"	W80° 08' 46.11"	1:45 PM
	11	6.37	88	N25° 48' 5.33"	W80° 08' 31.70"	1:49 PM
	12	6.78	67	N25° 47' 56.35"	W80° 08' 20.70"	1:45 PM
	13	7.16	81	N25° 47' 48.56"	W80° 08' 10.72"	1:38 PM
	14	7.91	70	N25° 47' 32.00"	W80° 07' 50.60"	1:29 PM
	15	8.17	92	N25° 47' 26.39"	W80° 07' 43.80"	1:22 PM

Measurements were made July 23, 2018 by George D. Butch using

Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

WQAM 560 KHz. Miami, FL**4.1 KW ND.****192° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.37	770	N25° 50' 11.43"	W80° 11' 24.69"	9:28 AM
	2	0.46	620	N25° 50' 8.80"	W80° 11' 25.43"	9:34 AM
	3	0.75	560	N25° 49' 59.52"	W80° 11' 27.61"	9:38 AM
	4	0.97	450	N25° 49' 52.72"	W80° 11' 29.24"	9:42 AM
	5	1.14	265	N25° 49' 47.02"	W80° 11' 30.56"	9:46 AM
	6	1.27	360	N25° 49' 42.94"	W80° 11' 31.52"	9:52 AM
	7	1.44	215	N25° 49' 37.83"	W80° 11' 32.72"	9:57 AM
	8	1.54	205	N25° 49' 34.56"	W80° 11' 33.52"	10:02 AM
	9	1.72	245	N25° 49' 28.84"	W80° 11' 34.87"	10:05 AM
	10	2.02	240	N25° 49' 19.28"	W80° 11' 37.07"	10:16 AM
	11	2.20	190	N25° 49' 13.63"	W80° 11' 38.45"	10:20 AM
	12	2.41	183	N25° 49' 6.98"	W80° 11' 40.00"	10:29 AM
	13	2.68	155	N25° 48' 58.35"	W80° 11' 42.05"	10:35 AM
	14	2.84	185	N25° 48' 53.46"	W80° 11' 43.19"	10:40 AM
	15	3.00	155	N25° 48' 48.11"	W80° 11' 44.06"	10:45 AM
	16	3.80	85	N25° 48' 22.95"	W80° 11' 50.36"	10:50 AM
	17	4.78	75	N25° 47' 51.95"	W80° 11' 57.69"	10:55 AM
	18	7.22	75	N25° 46' 34.46"	W80° 12' 15.96"	11:05 AM
	19	9.04	60	N25° 45' 36.97"	W80° 12' 29.54"	11:24 AM
	20	11.19	62	N25° 44' 28.83"	W80° 12' 45.59"	11:38 AM

Measurements were made July 25, 2018 by George D. Butch using

Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

WQAM 560 KHz. Miami, FL**4.1 KW ND.****252° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.45	850	N25° 50' 18.72"	W80° 11' 37.41"	4:00 PM
	2	0.74	750	N25° 50' 15.88"	W80° 11' 47.22"	3:54 PM
	3	0.98	440	N25° 50' 13.56"	W80° 11' 55.39"	3:50 PM
	4	1.16	460	N25° 50' 11.62"	W80° 12' 1.69"	3:45 PM
	5	1.35	400	N25° 50' 9.73"	W80° 12' 8.23"	3:39 PM
	6	1.48	340	N25° 50' 8.47"	W80° 12' 12.59"	3:35 PM
	7	1.70	280	N25° 50' 6.20"	W80° 12' 20.25"	3:30 PM
	8	1.98	235	N25° 50' 3.44"	W80° 12' 29.71"	3:20 PM
	9	2.17	240	N25° 50' 1.47"	W80° 12' 36.47"	3:13 PM
	10	2.43	185	N25° 49' 58.92"	W80° 12' 45.21"	3:08 PM
	11	2.80	225	N25° 49' 55.18"	W80° 12' 57.87"	3:05 PM
	12	3.07	125	N25° 49' 52.54"	W80° 13' 6.98"	3:00 PM
	13	3.92	68	N25° 49' 44.03"	W80° 13' 36.06"	2:54 PM
	14	4.98	76	N25° 49' 33.38"	W80° 14' 12.42"	2:47 PM
	15	7.10	75	N25° 49' 12.23"	W80° 15' 24.77"	2:39 PM
	16	9.07	58	N25° 48' 52.44"	W80° 16' 32.10"	2:18 PM
	17	10.92	44	N25° 48' 33.91"	W80° 17' 35.40"	2:03 PM
	18	13.06	41	N25° 48' 12.42"	W80° 18' 48.67"	1:46 PM
	19	14.98	47	N25° 47' 53.11"	W80° 19' 54.28"	1:30 PM

Measurements were made July 25, 2018 by George D. Butch using

Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

WQAM 560 KHz. Miami, FL**4.1 KW ND.****312° Field Strength Measurements**

	Point	Distance (km)	Field (mv/m)	Coordinates (NAD 83)		Time of Day (EDT)
	1	0.39	1200	N25° 50' 31.57"	W80° 11' 32.32"	12:40 PM
	2	0.57	800	N25° 50' 35.62"	W80° 11' 37.24"	12:35 PM
	3	0.67	950	N25° 50' 37.77"	W80° 11' 39.84"	12:31 PM
	4	0.78	390	N25° 50' 40.21"	W80° 11' 42.94"	12:28 PM
	5	1.00	450	N25° 50' 44.91"	W80° 11' 48.71"	12:15 PM
	6	1.21	310	N25° 50' 49.36"	W80° 11' 54.25"	12:10 PM
	7	1.49	175	N25° 50' 55.50"	W80° 12' 1.84"	11:59 AM
	8	1.73	170	N25° 51' 0.67"	W80° 12' 8.24"	11:52 AM
	9	2.13	150	N25° 51' 9.31"	W80° 12' 18.92"	11:46 AM
	10	2.28	205	N25° 51' 12.63"	W80° 12' 22.95"	11:42 AM
	11	2.72	190	N25° 51' 22.09"	W80° 12' 34.72"	11:33 AM
	12	3.03	155	N25° 51' 28.81"	W80° 12' 42.95"	11:27 AM
	13	4.21	140	N25° 51' 54.46"	W80° 13' 14.62"	11:18 AM
	14	4.92	80	N25° 52' 9.83"	W80° 13' 33.56"	11:10 AM
	15	6.99	73	N25° 52' 54.64"	W80° 14' 28.97"	10:49 AM
	16	8.90	58	N25° 53' 35.95"	W80° 15' 20.01"	10:31 AM
	17	10.61	38	N25° 54' 13.07"	W80° 16' 5.78"	10:16 AM
	18	13.00	42	N25° 55' 4.70"	W80° 17' 9.69"	9:56 AM
	19	14.22	35	N25° 55' 31.39"	W80° 17' 42.63"	9:42 AM

Measurements were made July 26, 2018 by George D. Butch using

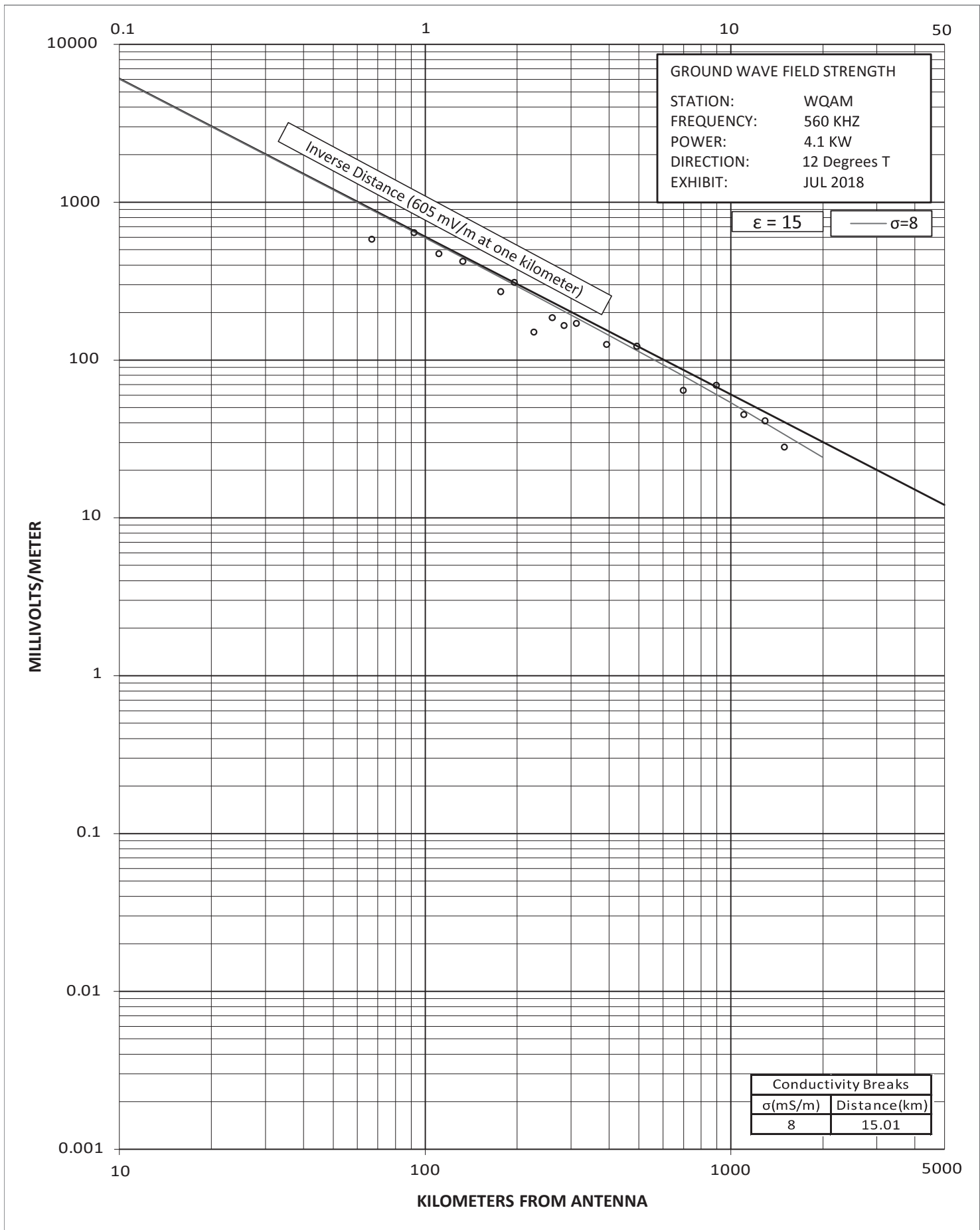
Potomac Instruments FIM-41, SN 2070, factory calibrated October 11, 2000.

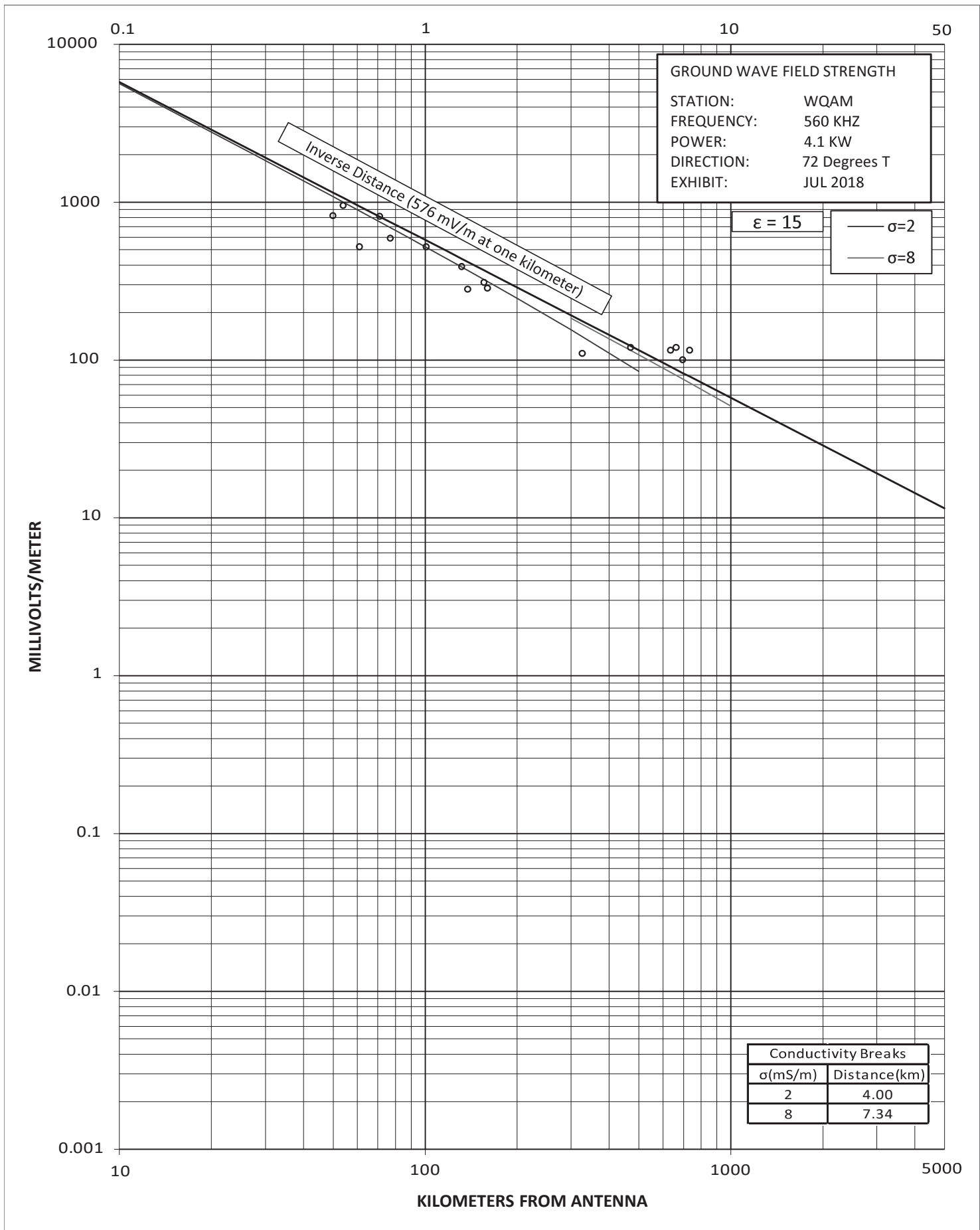
Accuracy was field checked on July 20, 2018 against FIM-41, SN 1924, factory calibrated September 26, 2016.

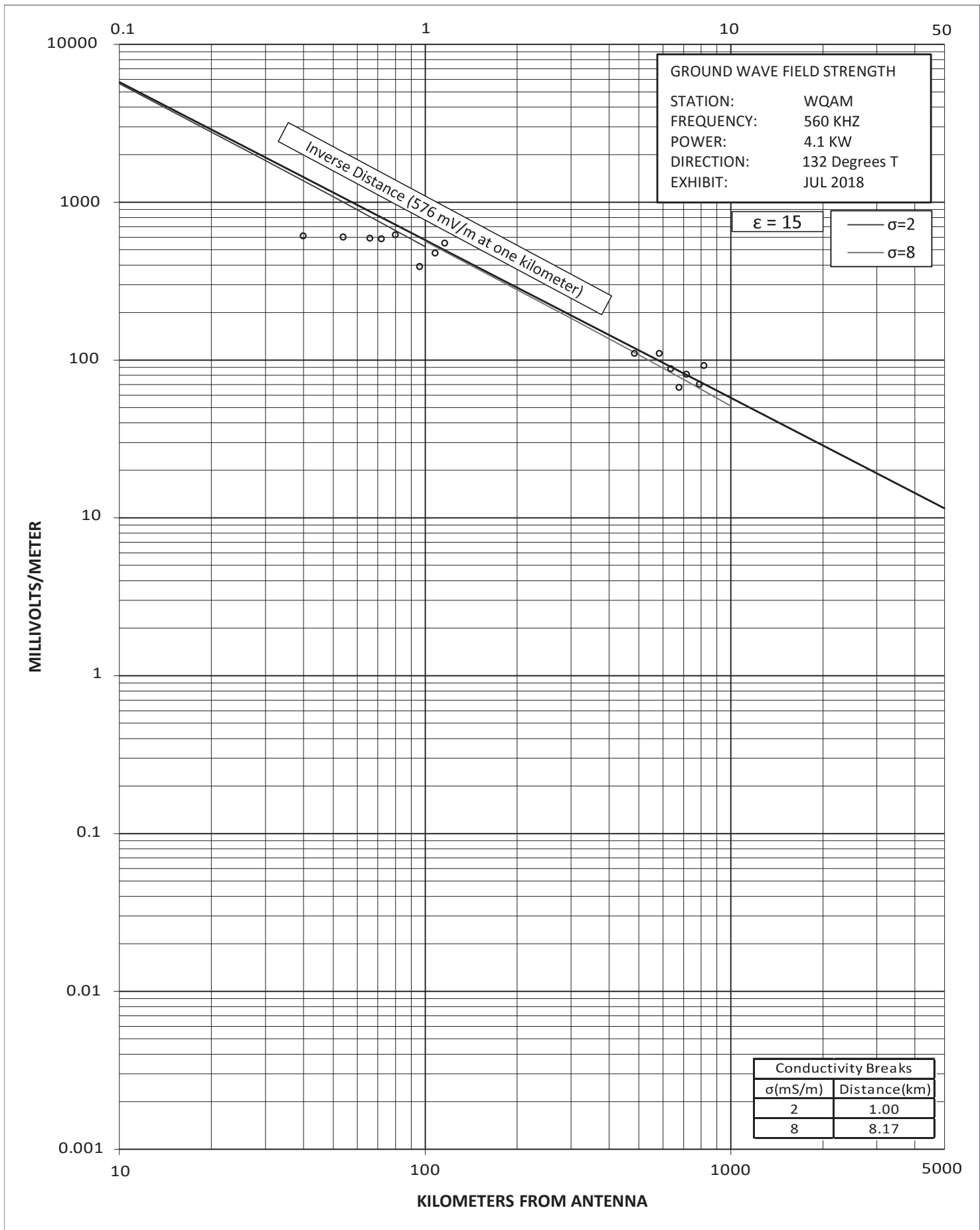
Graphs of Measured Field Strength Data – WQAM

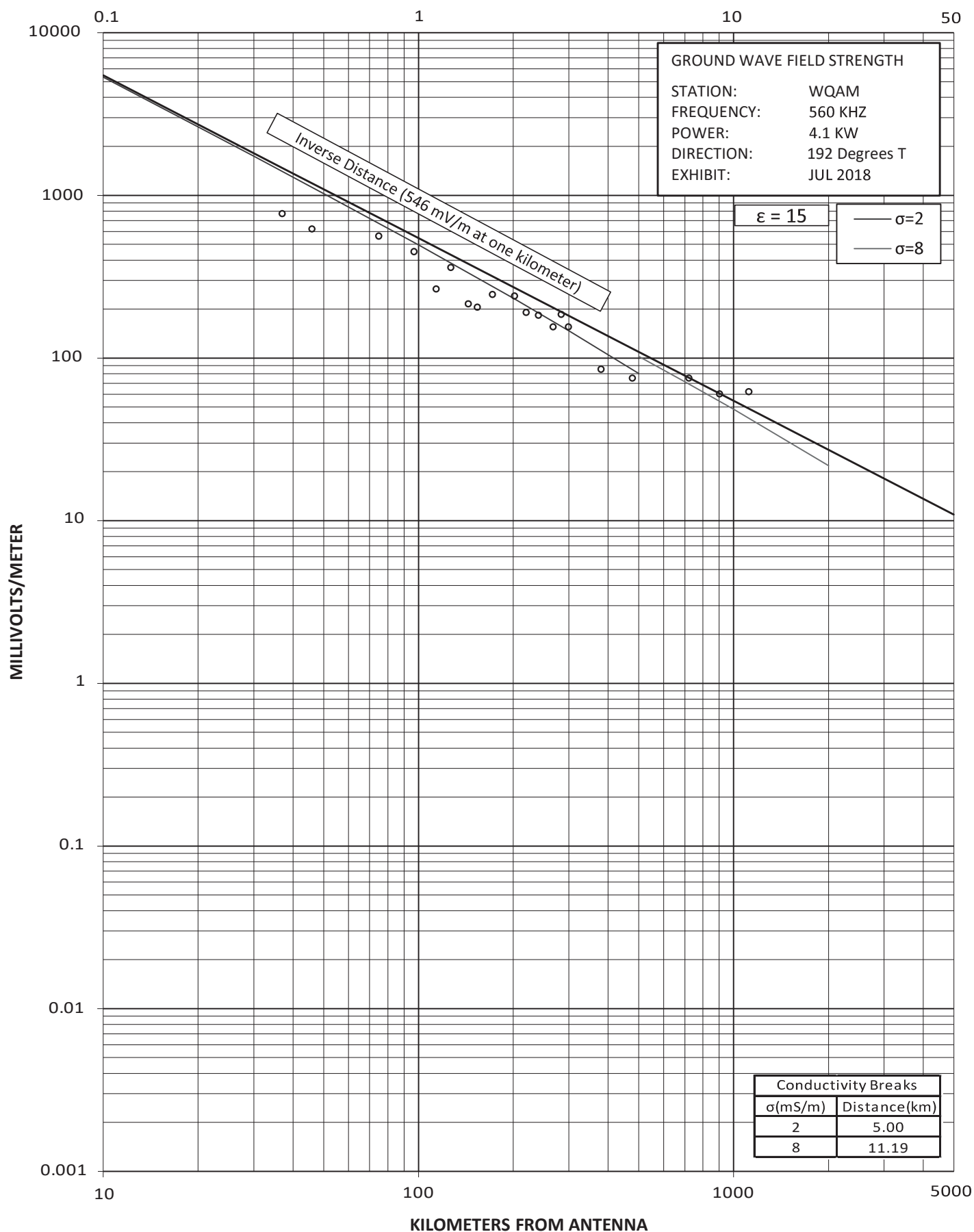
The field strength measurements for the six radials were graphically analyzed following the procedure outlined in Section 73.186 of the FCC Rules, using graphs as described in Section 73.184, to determine their unattenuated field strength values at one kilometer. It is noted that all of the radials have points that match the curve for 8 mS/m, the FCC's M-3 ground conductivity for the area, well over much of their measured spans. Some radials have lower analyzed ground conductivity near the transmitter site that appears to be due to the clutter of dense commercial buildings and power lines there. There is also evidence of intensification at the ends of certain radials that were measured on barrier islands across spans of salt water from the transmitter site, as is to be expected under such circumstances.

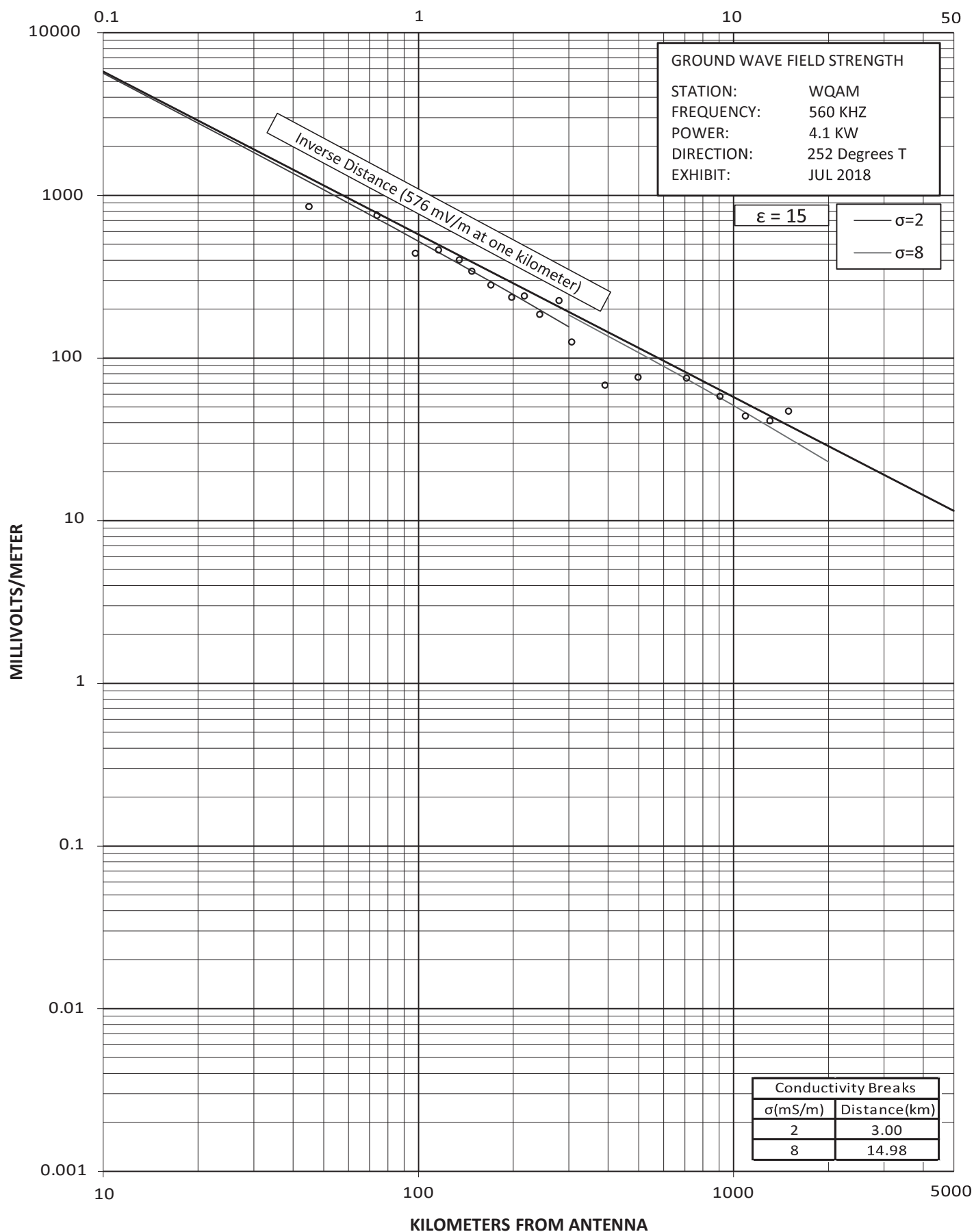
The field strength measurement graphs, showing the unattenuated field strength and ground conductivity values that were found through their analysis, appear on the following pages. The last of the graphs shows the family of ground conductivity curves that was used in that analysis..

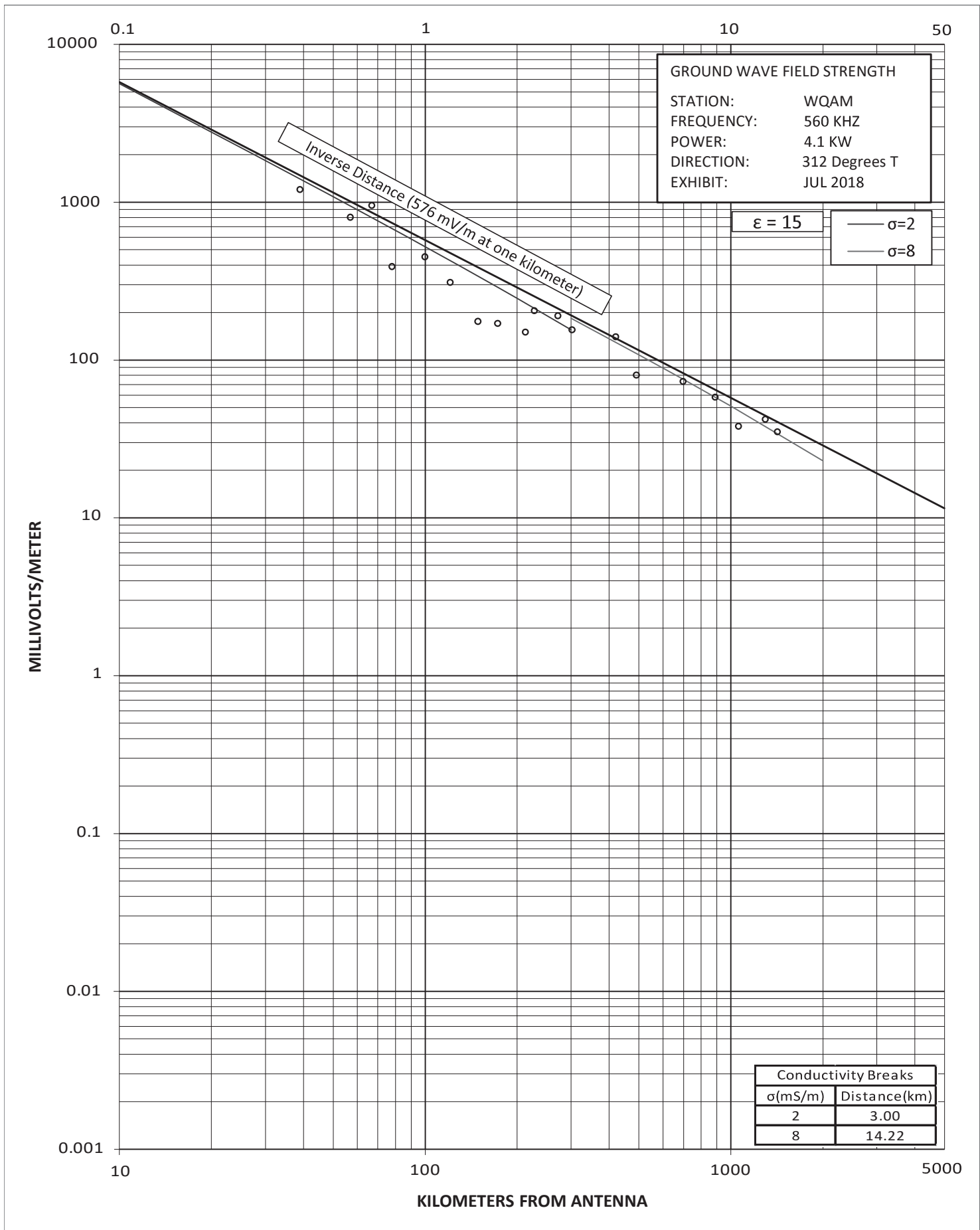


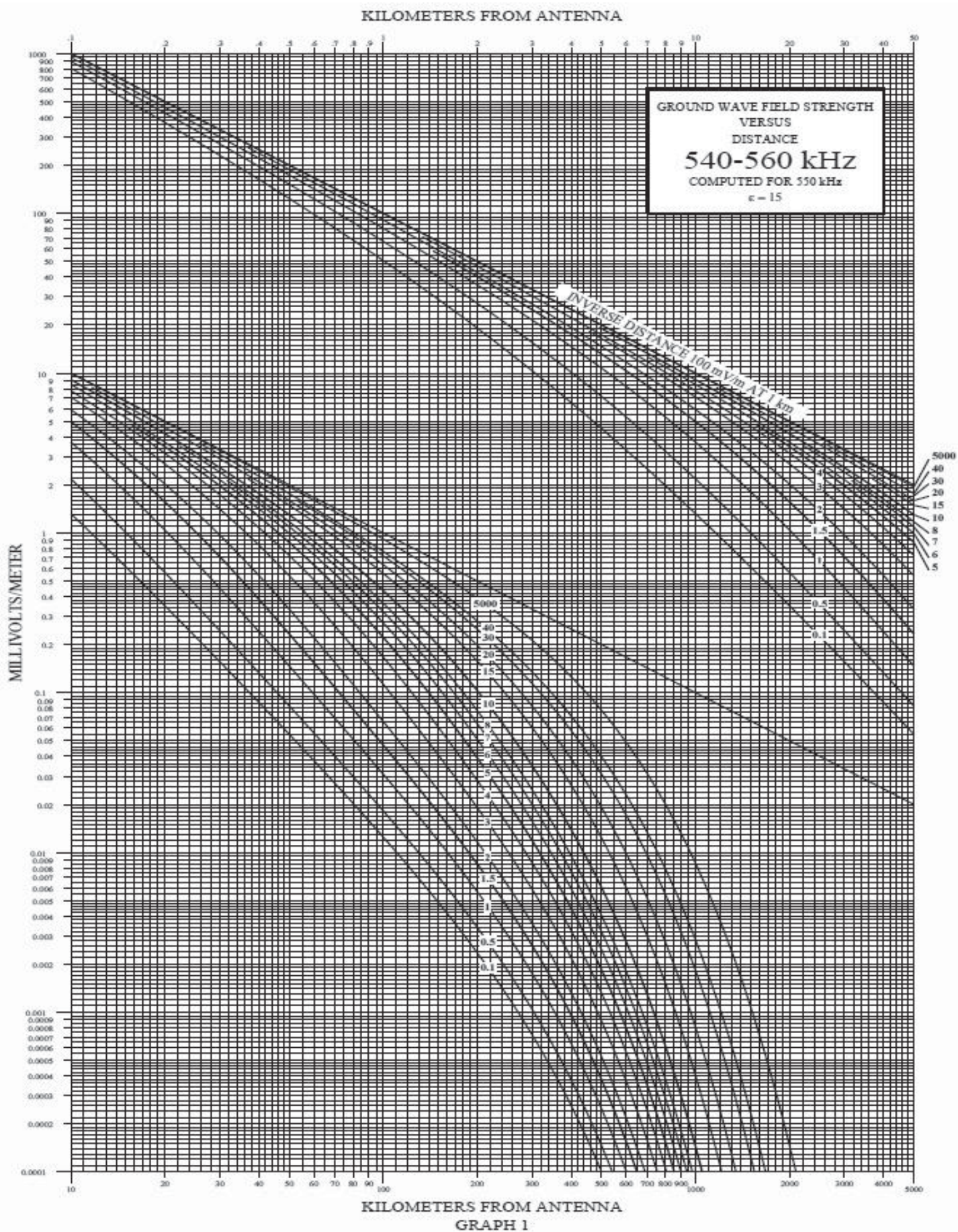








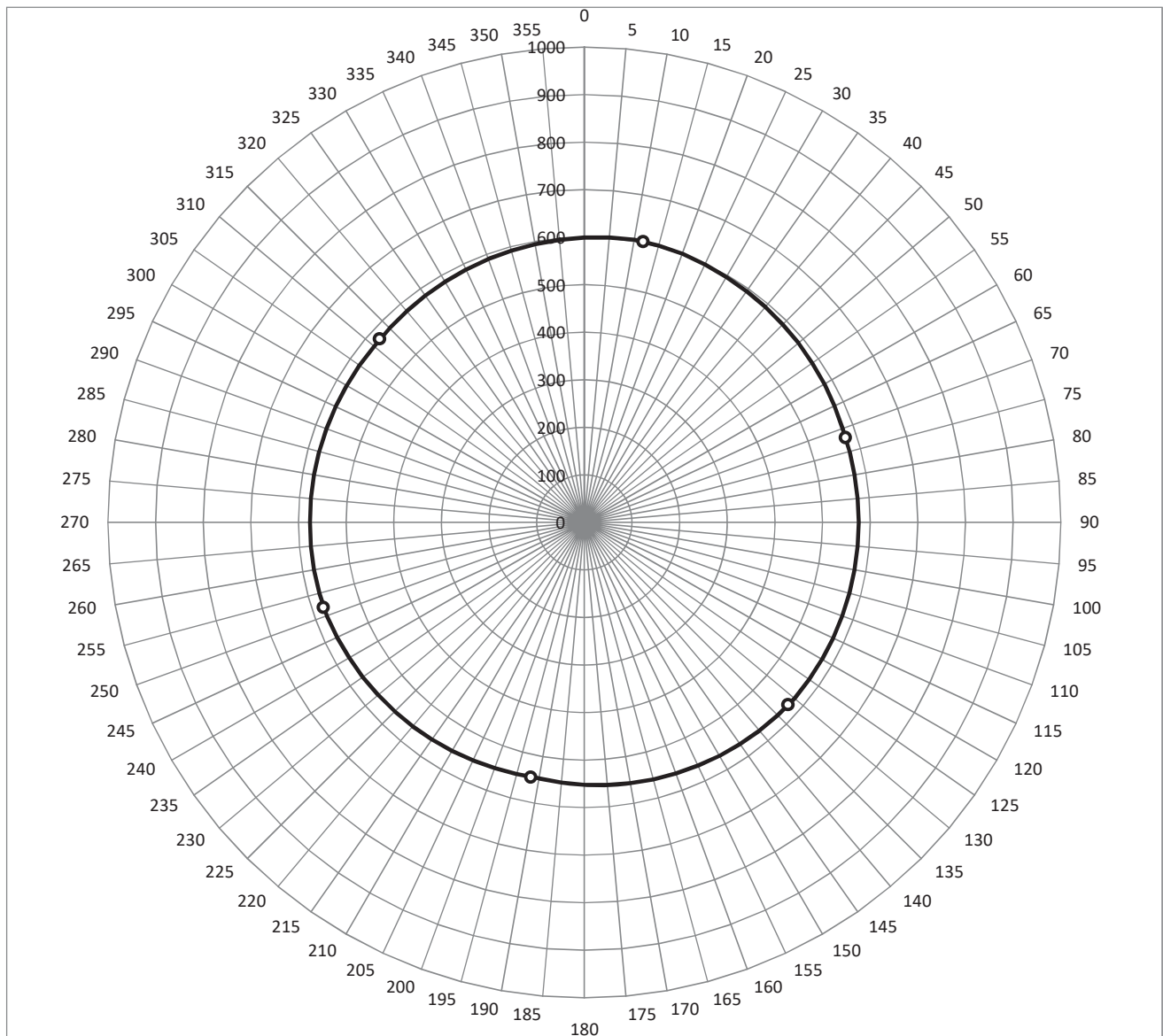




Measured Nondirectional Horizontal Plane Radiation Pattern – WQAM

The radial unattenuated field strength values at one kilometer, as determined by graphical analysis of the field strength data, were plotted on a polar coordinate graph to determine the RMS efficiency of the nondirectional radiation pattern. It was found to be 575.9 mV/m at one kilometer for the 4.1 kilowatt power level at which the measurements were made. At 1.0 kilowatt, the equivalent field strength is 284.4 mV/m at one kilometer – which is the value that was calculated for the antenna at the time of the original application for construction permit and which is specified on the construction permit.

The polar plot of the measured nondirectional antenna pattern appears on the following page. It shows that the requirement of condition five of the construction permit has been met.



(mV/m at one kilometer)

MEASURED
RMS = 575.9 mV/m

Site Coordinates(NAD 27)
25° 50' 22" N
80° 11' 23" W

MEASURED NONDIRECTIONAL HORIZONTAL PLANE RADIATION PATTERN

RADIO STATION WQAM
MIAMI, FLORIDA

560 KHZ 4.1 KW-D 1.0 KW-N U ND

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

In the FCC Form 2100 – Schedule 396 for its stations in the Norfolk market, Licensee disclosed that on November 30, 2018, a former employee, Kristina Price, filed a charge with the United States Equal Employment Opportunity Commission (“EEOC”) alleging disability discrimination (EEOC Charge No. 437-2019-00222). *See* FCC File No. 0000073703, as modified by FCC File No. 0000081093. On August 26, 2019, a reasonable cause determination was issued against certain of Licensee’s affiliates, including Licensee’s corporate parent, with respect to that charge. While disability discrimination is not one of the enumerated classes of discrimination set forth in Section 73.2080 of the Commission’s Rules, Licensee disclosed the pending charge and subsequent determination in the applicable FCC Form 2100 – Schedule 396 out of abundance of caution. In that same abundance of caution, Licensee is disclosing this determination in response to the Adverse Findings Section of this FCC Form 302-AM. On September 30, 2019, Licensee’s affiliates settled the claim.

Commission precedent establishes that an adverse finding exists only if there has been an adjudication by an ultimate trier of fact. *Policy Regarding Character Qualifications in Broadcast Licensing*, Memorandum Opinion and Order, 7 FCC Rcd 6564, 6566 para 10 (1992). “An ‘ultimate trier of fact’ is a court or administrative body whose factual findings are not subject to de novo review.” *Id.* (internal citations omitted).

An EEOC reasonable cause determination is not a “finding” of discrimination or adjudication by an ultimate trier of fact. It does not require “weighing of information from both complainant and respondent” and “is a gateway not to an evidentiary hearing but to *informal methods* of conference, conciliation, and persuasion.” *Nat’l Broad. Co., Inc.*, 58 F.C.C.2d 419, 421 ¶¶ 4, 5 (1976) (emphasis added). EEOC proceedings are also “not of an adversary nature.” *See Hubbard Broadcasting, Inc.*, 48 F.C.C. 2d 717, 524 n.6 (1974). A reasonable cause determination is essentially an initial determination based on limited facts made available to the EEOC, without the respondent having the ability to present a full defense, that there is reasonable cause to move forward with the informal conciliation process. Furthermore, EEOC decisions are subject to de novo review.

In any case, Licensee submits that, based on Commission precedent, a reasonable cause determination, based on a complaint which has since settled, should not be an impediment to the grant of this application. *See, e.g., Pac. & S. Co., Inc.*, 11 F.C.C. Rcd. 8503, 8507 (1996) (denying an application for review and affirming grant of renewal application where a reasonable cause determination had been issued); *Focus Cable of Oakland, Inc.*, 65 F.C.C.2d 35 (1977); *Nat’l Broad. Co., Inc.*, 62 F.C.C.2d 582, 583 (1977); *Nat’l Broad. Co., Inc.*, 58 F.C.C.2d 419 (1976).