

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE:

**BROADCAST COMMUNICATIONS, INC.
AM BROADCAST STATION WKFB
770 KHZ 0.75 KW-CH/0.75 KW-D ND D**

**LICENSED: JEANNETTE, PENNSYLVANIA
PROPOSED: NORTH HUNTINGDON, PENNSYLVANIA**

7 January 2005

FCC FACILITY NUMBER 10026

ENGINEERING EXHIBIT
IN SUPPORT OF AN APPLICATION FOR CONSTRUCTION PERMIT
TO CHANGE THE PRINCIPAL COMMUNITY
OF AN EXISTING CLASS D AM STATION
[APPLICATION FOR A MAJOR CHANGE]



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NARRATIVE STATEMENT:

I. GENERAL:

I, Alan E. Gearing, hereby certify: that I am a senior engineer in the firm of Mullaney Engineering, Inc., consulting broadcast and radio communications engineers with offices in Gaithersburg, Maryland; that I hold a Bachelor of Science degree in Electrical Engineering from SUNY University at Buffalo; that I am a registered professional engineer in the District of Columbia (since 1979); and that I have provided engineering services in the areas of broadcasting and radio communications since 1973. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

This Narrative Statement and the Engineering Exhibit of which it is part have been prepared on behalf of BROADCAST COMMUNICATIONS, INC. (hereinafter "BCI"), licensee of AM Broadcast Station WKFB, currently authorized to serve JEANNETTE, Pennsylvania [FCC FACILITY ID NUMBER 10026]. WKFB is a Class D station licensed to operate on the frequency of 770 kHz with daytime and critical hours power of 750 watts. A nondirectional antenna is employed for both daytime and critical hours operations.

During the January 26-30, 2004 *Window for Certain AM Construction Permit Applications* (see FCC Public Notice of November 6, 2003; DA 03-3532) BCI filed a *major change* application for construction permit **to change the WKFB principal community from JEANNETTE to NORTH HUNTINGDON, Pennsylvania [See BMJP-20040129AOP]**. No changes were proposed in the technical operation of station WKFB.

The instant application is in response to FCC Public Notice of November 17, 2004 (DA 04-3596) *AM Auction No. 84 Singleton Applications*, which requires that the singleton applicants (those that are not mutually exclusive with any other applications submitted in the filing window) listed in Attachment A-2 of the Public Notice submit a complete FCC Form 301 application between November 18, 2004, and January 18, 2005. The instant application makes no changes in the facilities proposed in BMJP-20040129AOP and merely supplies the necessary supporting documentation.

Since no actual construction is being proposed and since no changes are proposed in WKFB's technical operation from that currently licensed, considerations relative to compliance with the *Commission's Procedures Implementing The National Environmental Policy Act Of 1969* are not applicable - this includes considerations relative to compliance with *FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*. Procedures are already in place to protect workers requiring access to the tower inside the fenced area, including reduction of power or cessation of operation, to comply with germane exposure guidelines. These procedures take into account the presence of co-located co-owned AM broadcast station WKHB, Irwin, Pennsylvania.

Answers to questions on Section III-A of FCC Form 301 [September 2004 version] are incorporated in the following paragraphs, figures, and tables.

II. ENGINEERING DISCUSSION:

Since no changes are being proposed in the technical operation of WKFB - the only proposed change is in the station's principal community of license - information concerning the WKFB transmitter/antenna site, antenna, allocation matters, and general coverage matters is not being submitted herein. This information will be provided upon request by the Commission.

The only information called for on FCC Form 301 which is pertinent to the instant application is coverage of the proposed new principal community, NORTH HUNTINGDON, Pennsylvania. Figure 1 herein is a map showing the location of the WKFB daytime and critical hours 5 mV/m contour¹ relative to NORTH HUNTINGDON. From the map it is clear that the entirety of NORTH HUNTINGDON, the principal community to be served, is encompassed by the 5mV/m contour, in compliance with the requirements of §73.24(i).

Note that both WKFB's current principal community, JEANNETTE (located in Westmoreland County), and WKFB's proposed principal community, NORTH HUNTINGDON (also located in Westmoreland County), are both in the Arbitron Pittsburgh Radio Metro. Hence the instant proposal has no impact on multiple ownership considerations. (BCI also owns AM broadcast station WKHB licensed to Irwin, Pennsylvania. Irwin is located in Westmoreland county and is in the Pittsburgh Radio Metro. Other stations co-owned by BCI are licensed to communities outside the Arbitron Pittsburgh Radio Metro)

¹ The WKFB operating facilities are the same for both daytime and critical hours operation. Therefore only one contour is shown.

III. SUMMARY:

BCI proposes to continue operating Class D AM station WKFB on 770 kHz, with nondirectional daytime and critical hours power of 750 watts. The only change is in the station's principal community from Jeannette to North Huntingdon.

The proposed change in principal community would have no impact on coverage or allocation considerations, and would not have any significant impact on the environment. The proposed operation is believed to be fully in compliance with the Commission's rules and applicable international agreements.

The undersigned attests that the instant narrative statement and accompanying figure were prepared by himself and that the statements contained herein are true of his own personal knowledge except those stated to be on information and belief, and as to those statements he verily believes them to be true and correct.



Alan E. Gearing, P.E.