

ENGINEERING REPORT COVERING
REQUEST FOR CONSTRUCTION PERMIT
ON BEHALF OF KOVAS COMMUNICATIONS, INC.
FOR WCGO(AM) 1590 KILOHERTZ
EVANSTON, ILLINOIS

FEBRUARY 2012

ENGINEERING REPORT COVERING
REQUEST FOR CONSTRUCTION PERMIT
ON BEHALF OF KOVAS COMMUNICATIONS, INC.
FOR WCGO(AM) 1590 KILOHERTZ
EVANSTON, ILLINOIS

SUMMARY

The engineering report of which this statement is part was prepared on behalf of Kovas Communications, Inc., hereinafter referred to as “Kovas”, in support of an application for construction permit for station WCGO(AM) Evanston, Illinois. Kovas is the licensee of WCGO. WCGO operates on 1590 kilohertz with power of 7 kilowatts day nondirectional and 2.5 kilowatts night directional.

Kovas leases the WCGO transmitter site. The lease is expiring and Kovas has been advised by the landlord that it wishes to have Kovas vacate the site by September 1. Therefore, the purpose of this application is to request relocation of the transmitter site to a contiguous property. Aside from the physical relocation, which is only 0.182 kilometers (596 feet) from the licensed site, no other changes of any kind are sought. Kovas proposes to construct the licensed antenna system in a 100% identical manner on the new site. All proposed antenna specifications will be identical to the licensed specifications.

SECTION 73.182(q)

A nighttime allocation study was conducted for WCGO and revealed seven stations for which WCGO is presently a contributor to their 50 or 25% RMS limits, thereby raising the question of whether the ratcheting provisions of Section 73.182(q) footnote 1 apply for the proposed WCGO operation. Although this application proposes technical facilities which are identical to the licensed facilities and the distance between the transmitter sites is only 0.182 kilometers, the undersigned contacted the Commission staff to ascertain if Section 73.182(q) footnote 1 is applicable and was advised that Section 73.182(q) footnote 1 was not applicable for this application.

SITE COORDINATES

During the course of reviewing this application, it was discovered the licensed WCGO coordinates were incorrect. The NAD27 coordinate data is:

Licensed Latitude	42° 01' 20"	Licensed Longitude	87° 42' 43"
Actual Latitude	42° 01' 17"	Actual Longitude	87° 42' 41"
Proposed Latitude	42° 01' 15"	Proposed Longitude	87° 42' 34"

Since the site is being relocated, use of the actual coordinates to compute the distance between the licensed and proposed sites is relevant. The distance between the sites of 0.182 kilometers was calculated based on the actual coordinates and not the licensed coordinates.

PROPOSED SITE

Figure 1 is an aerial photograph of the existing and proposed WCGO sites. Figure 2 is a site plat showing the towers and ground system. The proposed ground system specifications are identical to the license specifications of file BL-20090417AJU except the length of the copper radial ground wires will be 155 feet instead of 172 feet.

ALLOCATION CONSIDERATIONS

Since the proposed facilities are identical to the license facilities and the site is being relocated by only 0.182 kilometers, any change in allocation considerations is *de minimis* and no allocation exhibits are submitted except Figure 3, which is a mapping of the 1000 mV/m contour.

DAYTIME POWER/RMS DISCREPANCY

A clerical error was discovered for the WCGO daytime nondirectional antenna system operation. For the daytime nondirectional operation, WCGO is licensed for power of 7 kilowatts with an RMS efficiency of 815.2 mV/m based on a reference value of 308.1 mV/m/kw. However, using WCGO's nondirectional antenna electrical height of 87.3°, whose reference value is 304.0 mV/m/kw, the power necessary to produce 815.2 mV/m is 7.2 kilowatts. The power was incorrectly listed as 7 kilowatts on the underlying WCGO application for construction permit, BP 20070404ABB, because the reference value used to compute the power level was wrong. All allocation exhibits in that application were based on the presently licensed RMS efficiency of 815.2 mV/m. Accordingly, it is requested the daytime power be changed to 7.2 to correct this error.

ANSI RADIATION GUIDELINES

A study of the proposed facility was conducted with respect to standards set forth in FCC Bulletin OST Number 65, Edition 97-01, regarding human exposure to radiofrequency radiation. In order to represent a worst case scenario it was assumed the maximum power proposed, 7.2 kilowatts for the daytime antenna system, would be present at a single tower. The study was based on data provided in Tables 1 and 2 of Supplement A, "Predicted Distances for Compliance with FCC Limits". Based on Tables 1 and 2, a distance of 2.4 meters from the tower would have to be observed to achieve ANSI radiofrequency compliance.

When it is necessary for workers to be within the hazard area near the towers, an appropriate power reduction or temporary cessation of broadcasting will be implemented. Access to the towers will be prevented by a fence with a locked gate. Signs, warning of a RF hazard, will be conspicuously posted at the site.

DECLARATION

The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Freehold, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

/s/

Charles A. Hecht
Charles A. Hecht & Associates, Inc.
19 Mackenzie Court
Freehold, New Jersey 07728
(732) 577-0711
February 13, 2012