

ENGINEERING STATEMENT  
IN SUPPORT OF  
APPLICATION FOR AUXILIARY ANTENNA / SITE  
4.7 kW 195 METERS HAAT  
WJYE 96.1 MHz CHANNEL 241B  
Facility ID 1915  
BUFFALO, NY

This statement and accompanying exhibits have been prepared on behalf of Townsquare Media of Buffalo, Inc., licensee of the above referenced FM Radio Station. The purpose of which is to explain the non-conformity of the proposed directional antenna with 47CFR Part 73 section 316 (b) (1).

The licensee proposes to operate into the HD port of the licensed<sup>1</sup> WBUF (Channel 225B) directional antenna utilizing a three port combiner. This antenna is located on an existing tower identified by ASRN 1006688 and is located at the following NAD 27 coordinates:

42° 57' 13.00" N Latitude  
78° 52' 36.00" W Longitude

The antenna is a Shively Antenna Model: 6014-2/2-DA and has an FCC ID No. 68166. The other two stations proposed to operate into this combiner for auxiliary purposes are as follows.

WYRK Ch-293B 106.5 MHz Buffalo, NY Facility ID 1908  
WBLK Ch-229B 93.7 MHz Depew, NY Facility ID 71215

Forms FCC-301 for Construction Permit(s) for the above two facilities are being simultaneously filed with this application.

As stated in the WBUF original application (FCC Form 301) for construction permit, the directional antenna exists solely to protect Canadian existing and proposed facilities. A front to back ratio of 20 db was necessary in order to achieve that protection. The application further requested a waiver of §73.316(b)(1) with respect to the direction of the affected

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<sup>1</sup> See BLH-20061114AAM Facility ID number: 53699

Canadian stations, and not that of existing and/or proposed domestic facilities. That waiver was apparently granted by the FCC, as a license for the WBUF facility was issued on October 30, 2007.

Figure 1 is a map showing the existing licensed predicted 60 db $\mu$  contour for WJYE as compared to the predicted 60 db $\mu$  contour proposed in this application and shows compliance with §73.1675(a)(ii) of the Commissions rules. The contours shown were generated over an arc of 360 degrees at 1 degree increments using a 30 second terrain database and software supplied by RadioSoft Inc. (Comstudy 2.2).

Figure 2 shows the horizontal field pattern of the existing WBUF directional antenna.

The licensee is aware that the directional response of the antenna to a frequency other than that of original design will vary. The proposed auxiliary 60 db $\mu$  contour is well within that of its licensed facility. It is believed and confirmed by Mr. Bob Surette of Shively Labs (manufacturer of the WBUF antenna) that the slight variation will not exceed the limits of §73.1675(a) (1)(ii) of the Commission's rules. If the antenna were non-directional, it would still comply with the rules. Referring to Figure 1, a hypothetical non-directional 60db $\mu$  contour is shown from the same location with parameters the same as this proposal.

### Environmental Considerations

Since this proposal requests utilizing an existing antenna and tower, the only environmental consideration is that of non-ionizing radiation (RFR).

Figure 3 is a matrix showing power density levels<sup>2</sup> two meters above ground level. A worst case scenario was used for all five stations, that is, a single bay rototiller antenna was assumed for each facility at the licensed and/or proposed center of radiation above ground level. These calculations show a total power density at the base of the tower with all five stations operating to be only 6.06 microwatts ( $\mu$ w/cm<sup>2</sup>). This represents only 0.61 percent of the maximum permissible exposure (MPE) for controlled areas as stated in the FCC's OET Bulletin 65 edition 97-01 of 1000  $\mu$ w/cm<sup>2</sup> (1.0 mw)/cm<sup>2</sup>). Calculations were conducted at 10-meter intervals out to a distance of 250 meters from the tower base. The maximum power density of 44  $\mu$ w/cm<sup>2</sup> was found at a distance of 190 meters from the base of the tower.

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<sup>2</sup> The FM Model program provided by the FCC Office of Engineering and Technology was utilized for these calculations

This represents only 22.4 % of the MPE of 200  $\mu\text{w}/\text{cm}^2$  for uncontrolled areas. There are no other sources of significant radiation in the immediate area of this proposal.

The licensee in cooperation with other users of the tower will either lower power or cease operations completely in order to protect personnel while performing maintenance on the tower. The tower is fenced and locked, with signs strategically placed warning of potential RFR hazards.

All information in this statement is believed by the undersigned to be true and accurate to the best of his knowledge.

                 Signed                  Date: August 6, 2011

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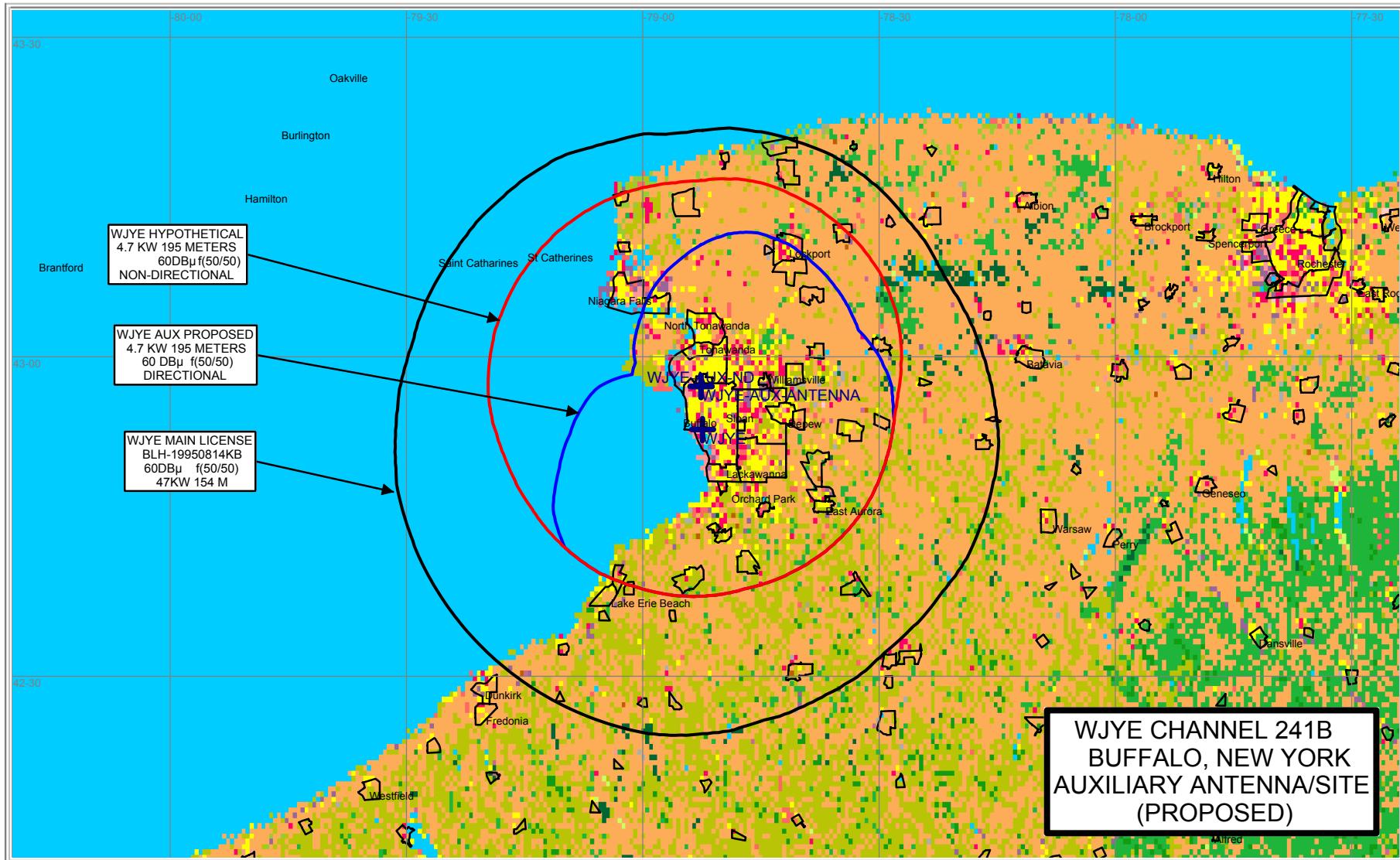
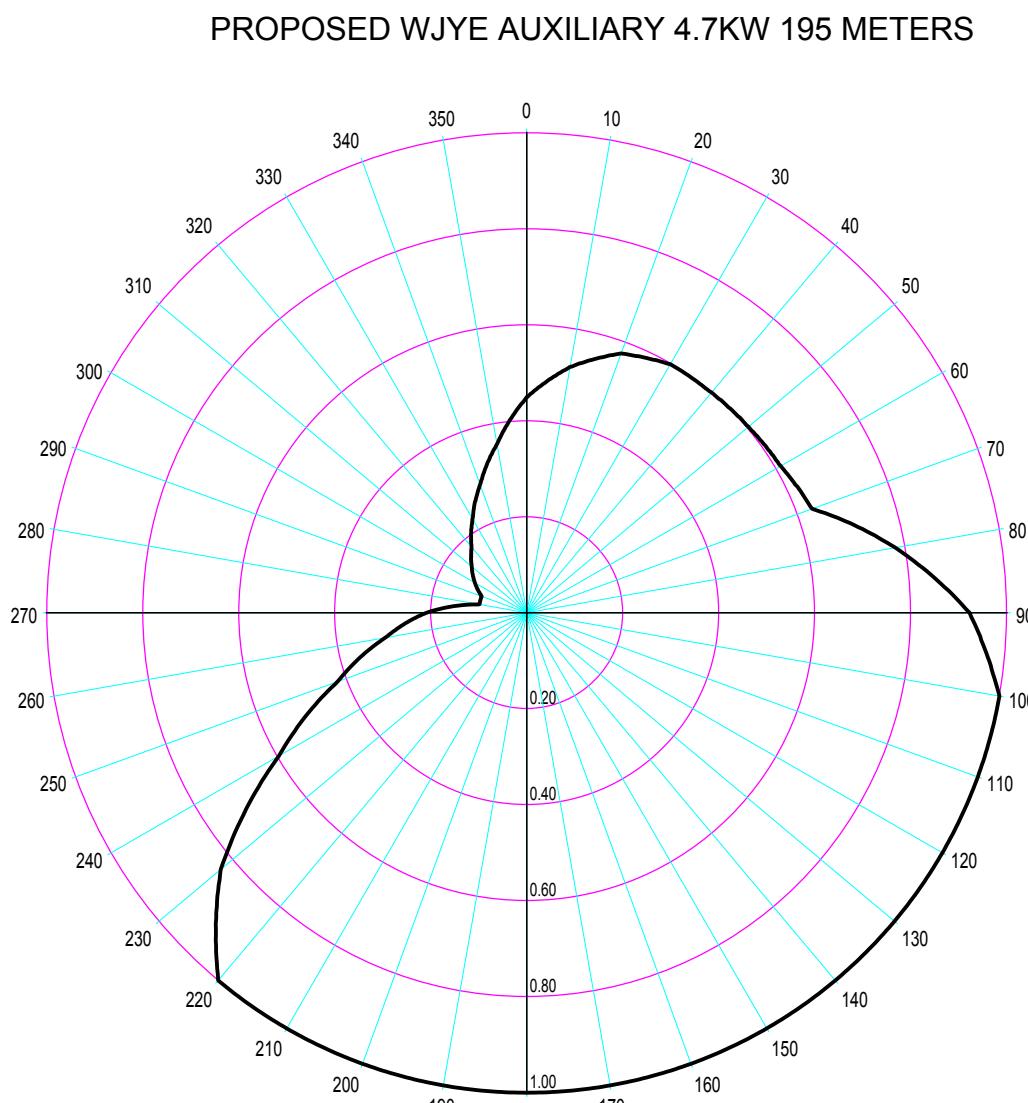


FIGURE 1

**FIGURE 2**

Azim	Rel.FS	ERP [kW]	dBk	Azim	Rel.FS	ERP [kW]	dBk
0.0	0.449	0.948	-0.234	185.0	1.000	4.700	6.721
5.0	0.484	1.101	0.418	190.0	1.000	4.700	6.721
10.0	0.520	1.271	1.041	195.0	1.000	4.700	6.721
15.0	0.547	1.406	1.481	200.0	1.000	4.700	6.721
20.0	0.575	1.554	1.914	205.0	1.000	4.700	6.721
25.0	0.586	1.614	2.079	210.0	1.000	4.700	6.721
30.0	0.598	1.681	2.255	215.0	1.000	4.700	6.721
35.0	0.598	1.681	2.255	220.0	1.000	4.700	6.721
40.0	0.599	1.686	2.270	225.0	0.916	3.944	5.959
45.0	0.601	1.698	2.298	230.0	0.832	3.253	5.123
50.0	0.603	1.709	2.327	235.0	0.714	2.396	3.795
55.0	0.607	1.732	2.385	240.0	0.596	1.670	2.226
60.0	0.611	1.755	2.442	245.0	0.507	1.208	0.821
65.0	0.622	1.818	2.597	250.0	0.419	0.825	-0.835
70.0	0.633	1.883	2.749	255.0	0.359	0.606	-2.177
75.0	0.706	2.343	3.697	260.0	0.299	0.420	-3.766
80.0	0.780	2.859	4.563	265.0	0.254	0.303	-5.182
85.0	0.851	3.404	5.320	270.0	0.209	0.205	-6.876
90.0	0.923	4.004	6.025	275.0	0.154	0.111	-9.529
95.0	0.961	4.341	6.375	280.0	0.100	0.047	-13.279
100.0	1.000	4.700	6.721	285.0	0.100	0.047	-13.279
105.0	1.000	4.700	6.721	290.0	0.100	0.047	-13.279
110.0	1.000	4.700	6.721	295.0	0.112	0.059	-12.295
115.0	1.000	4.700	6.721	300.0	0.125	0.073	-11.341
120.0	1.000	4.700	6.721	305.0	0.137	0.088	-10.545
125.0	1.000	4.700	6.721	310.0	0.150	0.106	-9.757
130.0	1.000	4.700	6.721	315.0	0.164	0.126	-8.982
135.0	1.000	4.700	6.721	320.0	0.179	0.151	-8.222
140.0	1.000	4.700	6.721	325.0	0.202	0.192	-7.172
145.0	1.000	4.700	6.721	330.0	0.226	0.240	-6.197
150.0	1.000	4.700	6.721	335.0	0.255	0.306	-5.148
155.0	1.000	4.700	6.721	340.0	0.284	0.379	-4.213
160.0	1.000	4.700	6.721	345.0	0.320	0.481	-3.176
165.0	1.000	4.700	6.721	350.0	0.357	0.599	-2.226
170.0	1.000	4.700	6.721	355.0	0.403	0.763	-1.173
175.0	1.000	4.700	6.721				
180.0	1.000	4.700	6.721				

# FIGURE 3

	Dist From Tower Meters	<b>WBUF</b>	<b>WGRF</b>	<b>WYRK</b>	<b>WBLK</b>	<b>WJYE</b>			Limit MPE
		Ch-225B 76 KW 192 M μw/cm <sup>2</sup>	CH-245B 24 KW 213 M μw/cm <sup>2</sup>	CH-293B 4.5 KW 192 M μw/cm <sup>2</sup>	CH-229B 4.5 KW 192 M μw/cm <sup>2</sup>	CH-241B 4.7 KW 192 M μw/cm <sup>2</sup>	RFR TOTAL μw/cm <sup>2</sup>	TOTAL MPE %	
		0	4.220	1.081	0.250	0.250	0.261	6.061	0.61%
Controlled	10	4.208	1.078	0.249	0.249	0.260	6.045	3.02%	0.2 mw/cm <sup>2</sup>
Uncontrolled	20	4.678	1.123	0.277	0.277	0.289	6.645	3.32%	
	30	6.241	1.475	0.370	0.370	0.386	8.841	4.42%	
	40	8.143	1.875	0.249	0.249	0.504	11.020	5.51%	
	50	10.299	2.359	0.610	0.610	0.637	14.514	7.26%	
	60	12.389	2.854	0.734	0.734	0.766	17.477	8.74%	
	70	14.476	3.334	0.857	0.857	0.895	20.419	10.21%	
	80	16.678	3.823	0.988	0.988	1.031	23.508	11.75%	
	90	18.824	4.328	1.115	1.115	1.164	26.546	13.27%	
	100	21.141	4.823	1.252	1.252	1.307	29.775	14.89%	
	110	23.289	5.359	1.379	1.379	1.440	32.846	16.42%	
	120	25.633	5.858	1.518	1.518	1.585	36.111	18.06%	
	130	27.734	6.393	1.642	1.642	1.715	39.126	19.56%	
	140	29.054	6.898	1.720	1.720	1.797	41.190	20.59%	
	150	29.921	7.310	1.772	1.772	1.850	42.624	21.31%	
	160	30.574	7.537	1.810	1.810	1.891	43.623	21.81%	
	170	30.976	7.719	1.834	1.834	1.916	44.279	22.14%	
	180	31.212	7.854	1.848	1.848	1.930	44.692	22.35%	
	190	31.299	7.940	1.853	1.853	1.936	44.882	22.44%	← Max
	200	31.121	7.992	1.843	1.843	1.925	44.723	22.36%	
	210	30.845	8.014	1.826	1.826	1.908	44.420	22.21%	
	220	30.488	7.979	1.805	1.805	1.885	43.964	21.98%	
	230	30.126	7.921	1.784	1.784	1.863	43.478	21.74%	
	240	29.810	7.845	1.765	1.765	1.844	43.028	21.51%	
	250	29.431	7.753	1.743	1.743	1.820	42.489	21.24%	