

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re: Application of:)	
)	File No. BMP-20130426ABP
DAIJ MEDIA, LLC)	Facility ID 14228
Station KRCM(AM), Shenandoah, TX)	

For Minor Changes to a Construction Permit

To: The Secretary
Forward to: Chief, Audio Division, Media Bureau

SUPPLEMENT TO INFORMAL OBJECTION

Entercom License, LLC (“Licensee”), licensee of KJCE(AM), Rollingwood, TX (Facility ID No. 1243) (“KJCE”), respectfully submits a supplement to its Informal Objection to Daij Media, LLC’s (“Daij”) application to Modify a Construction Permit (FCC File No. BMP-20130426ABP) (as amended on November 4, 2013¹) (the “Application”).

1. In addition to the findings that Licensee previously submitted in its Informal Objection, Licensee takes further issue with the measurements submitted by Daij. To corroborate its concerns, Licensee engaged George Schank of Broadcast Site Management, LLC to conduct an analysis of the measurements.² The Schank Report analyzed several measurement points along 6 radials.³ The Schank Report calls into question the validity of Daij’s measurement data due to the many discrepancies that were found regarding: (i) the amount of

¹ The FCC issued a “30 day” deficiency letter to Daij on August 21, 2013 (*See* letter of the Supervisory Engineer, Audio Division, Media Bureau dated August 21, 2013). Daij was required to amend the Application by September 20, 2013. Daij filed the amendment 45 days after this deadline and with no explanation regarding its untimely response. Dismissal of the Application is warranted pursuant to Section 73.3568 of the Commission’s rules.

² *See* attached “Report of Analysis of Data Contained in Daij Media Filing” dated June 23, 2013 attached hereto and incorporated herein as “Attachment A” (the “Schank Report”).

³ *Id.*

time it takes to reach a point; and (ii) the accessibility of the points.⁴ The Schank Report also concludes that there were plenty of accessible points along these radials that would have resulted in good measurements and questions why the difficult to access or completely inaccessible points were selected for measurement points instead.⁵ Until these discrepancies and inconsistencies are resolved, the Commission should not accept the measurement data submitted by Daij.

2. Daij's measurement data is also questionable because the FIM-21 meter Daij used to verify the measurements originally taken by the FIM-41 meter does not operate at frequencies above 1600 kHz.⁶ The FIM-41 meter Daij used to take measurements had not been calibrated within a 2 year period from the time Daij took the measurements.⁷ As Daij noted in its Opposition, the Commission has waived the calibration requirement when it is compared to a meter calibrated within a two year period and if both meters yield essentially the same results.⁸ However, in this case, an FIM-21 meter cannot be used to verify the accuracy of an FIM-41 meter's results to measure the test transmitter at 1680 kHz because the FIM-21 does not even operate on that frequency.⁹ In addition, Daij violated the explicit terms of its test transmitter authorization by operating the test transmitter outside the authorized "Non-critical daytime hours only."¹⁰

⁴ *Id.* at page 9.

⁵ *Id.*

⁶ See attached Engineering Statement by Hatfield & Dawson Consulting Engineers (the "Hatfield Statement") (attached hereto and incorporated herein as "Attachment B") at page 3.

⁷ *Id.*

⁸ See Opposition at page 4.

⁹ See Hatfield Statement at page 3.

¹⁰ *Id.*

3. Daij questions the acceptability of the measurement data that Licensee submitted in its Informal Objection because the field strength meter that Licensee's engineering consultant used had not been calibrated within a two year period.¹¹ Licensee's consultant engineer used a Potomac Instruments FIM-41 meter, serial number 1264, to conduct the measurements (the "Entercom Meter"). On May 6, 2013, the Entercom Meter was compared to a Potomac Instruments FIM-41, serial number 647, which was calibrated by Potomac Instruments on April 11, 2013 (the "H&D Meter").¹² Both meters tested KIRO on 710kHz, KBLE on 1050kHz and KRKO on 1380 kHz.¹³ The meters had identical readings for KIRO and KBLE, and for KRKO, the Entercom Meter indicated a reading a little under 2mV/m and the H&D Meter indicated a reading around 2.1mV/m.¹⁴ These results showed that the measurements taken by both meters substantially agreed with each other (including the reading on 1380 kHz, which was the frequency measured by Licensee since the 1680 kHz frequency of Daij's test transmitter was not operating at the time).¹⁵ Accordingly, the Entercom Meter that was used to conduct the measurements submitted in Licensee's Informal Objection complied with the Commission's requirements and should be considered by the Commission.

¹¹ See Opposition at pages 4-5.

¹² See Hatfield Statement at page 2; See attached Certificate of Calibration for the H&D Meter dated April 11, 2013; See attached Declaration by John W. Price dated December 6, 2013 (the "Price Declaration") (attached hereto and incorporated herein as "Attachment C"); See attached Certificate of Calibration for the H&D Meter dated April 11, 2013 (attached hereto and incorporated herein as "Attachment D").

¹³ *Id.*


¹⁴ *Id.*

¹⁵ *Id.*

For the foregoing reasons, Licensee respectfully requests that the Commission dismiss the Application and revoke the underlying construction permit.

Respectfully submitted,

By: _____

A handwritten signature in cursive script, appearing to read "Carrie Ward", written over a horizontal line.

Carrie Ward
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December 11, 2013


CERTIFICATE OF SERVICE

I, Janet Trainor, an assistant at Entercom Communications Corp., do hereby certify that on December 11, 2013 that a true copy of Entercom License, LLC's Supplement to Informal Objection was sent via United States First Class Mail, postage prepaid, to the following:

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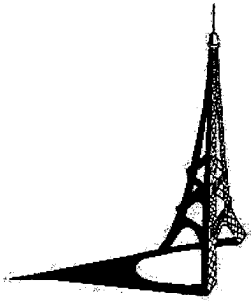
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Peter Doyle, Chief
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Janet Trainor

Attachment A



Broadcast Site Management, LLC

FACILITIES MAINTENANCE – MANAGEMENT – CONSTRUCTION

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REPORT OF ANALYSIS OF DATA CONTAINED IN DAIJ MEDIA FILING

June 23, 2013

This firm was retained by Entercom Communications to conduct an analysis to determine the accessibility of the measurement points shown in a filing made by DAIJ Media in November of 2011. This is a report of that analysis.

The analysis was conducted over a period from 14-19 June 2013; during favorable (although hot and dry) weather.

All points were plotted on a map, using the distances from the test transmitter site indicated in the DAIJ filing. Every reasonable attempt was made to try to reach each point; with the exception of only the more obviously available ones. Only those points that were questionable were checked.

Below is a synopsis of each radial studied. There are comments about each radial; along with journal entries for each point that had notable issues.

SYNOPSIS OF 140 DEGREE RADIAL

The DAIJ filing states that this entire radial was completed in one day; beginning at 1200 hrs CST. However, the times shown for the close-in measurements are all the same. The points closer to the transmitter were fairly accessible; but, in my opinion it is impossible for these measurements to have been taken in the manner and times set forth in the DAIJ filing. Issues I found relating to particular points on this radial are as follows:

140-20.31 - This point is inaccessible from Warren Ranch Rd. due to a locked gate. The only means of accessing the point would be on foot. The time required to walk .79 km on Mound Rd. to the

point was approximately 10 minutes. The return trip was approximately 10 minutes. Driving time to the next point was approximately 5 minutes. See next point.

140-24.58 – This point is also only accessible on foot due to a locked gate on Katy-Hockley Rd. I attempted the walk to the point from the gate; but, did not walk all the way into the Cypress Creek bottom. The time required to reach the point would have been approximately 20 minutes due to heavy brush. The return walk would also have been approximately 20 minutes. The stated time from the previous point is 19 minutes. In addition to driving time between the points, of approximately 7 minutes; the overall time between this point and the previous point could not have been less than 37 minutes.

140-32.86 - This point is completely inaccessible. This is a large expanse of private property that is gated, with keypad entry, at FM 529. There is also a camera-monitored gate at the back of a subdivision off of Fry Rd. When I went to that gate, no one acknowledged me. There is no way to hail any of the property owners by intercom or telephone. The stated time between the previous point and this point was 7 minutes. The walk out from the previous point, of 20 minutes, driving time of approximately 20 minutes (due to construction of a new freeway) plus the time required to walk to this point from FM 529 would have been at least 47 minutes. Even if the person making the measurements somehow gained access to the property by vehicle; the time between the points is still highly questionable.

140-35.92 – This point would have required a walk in of approximately 5 minutes, with a return of approximately 5 minutes. The stated time between this point and the previous point was 4 minutes. The actual drive time between the gate mentioned in the previous paragraph and this point was 2 minutes.

140-45.42 – This point is only accessible on foot. The time required to drive from the previous point (140-39.31) to this point, is approximately 6 minutes. The point was located in a heavily wooded area. The time required to access the point on foot would have been approximately 10 minutes. The stated time to this point from the previous point was 7 minutes; however it took a minimum of 16 minutes to make this trip.

Given the drastic differences between the times shown in the DAIJ filing, and my actual experience running the radial; I find it difficult to believe that the above points were actually accomplished. The rest of the points on this radial were generally accessible because they run through a metropolitan area.

SYNOPSIS OF 240 DEGREE RADIAL

This radial runs through primarily rural countryside, and ends just South of New Ulm, Texas. One point close to the transmitter was accessible; but with extreme difficulty due to the location behind residential property. Other points were simply inaccessible due to locked gates. Issues I found relating to particular points on this radial are as follows:

240-4.85 – Point is located behind residential property and was only accessible with extreme difficulty.

240-26.25 – This point was located in the approximate center of a livestock pasture. The best approach to the point was from a road West of the point; a distance of approximately .57 km. This would have required a walk in of approximately 5 minutes; however, it also required climbing through a five-strand barbed-wire fence. Climbing through, or over, a fence of this construction would have been difficult. I didn't care to try it.

240-35.23 – This point appears to be on the Bellville Country Club golf course; hole #7, par 4. It is not logical or credible that someone who was actually trying to measure these points would go that far back into a golf course for one point when there were better, more accessible ones nearby.

240-38.47 – This point is in the middle of a pasture and only accessible on foot. There is a locked gate on SH 36 that one could climb over to get to the point; but, the time to walk out from the point would be approximately 5 minutes. The driving time to the next point was over 25 minutes; because I had to drive back into Bellville in order to get to other county roads. The stated time to the next point was 14 minutes. The time shown in the DAIJ filing could not be duplicated.

240-43.25 – The time required to drive from this point to the next point was 35 minutes. The time indicated in the DAIJ filing of 9 minutes could not be duplicated.

240-49.73 – This point is located within a wildlife management area. It is only accessible on foot due to a locked gate on New Bremen Rd. The time required to walk to the point was approximately 8 minutes in, and 8 minutes out. The approximate driving time to a possible access location for the next point was 5 minutes. Thus the time indicated in the DAIJ report of 14 minutes could not be duplicated. See next point.

240-52.31 – This point was inaccessible due to a keypad controlled gate on FM 1094. The DAIJ filing indicates that it took 9 minutes to reach this point from the previous point. Given that this point is inaccessible; the time indicated in the DAIJ filing could not be duplicated.

240-54.77 – This point is inaccessible due to the road, leading to the point, terminating at a private residence. The property owner, Bobby Weige, stated that no one has been in the property for the purposes of taking any kind of measurements. Thus the validity of the times in the DAIJ report is suspect.

240-57.33 – This point was not accessible except on foot. No attempt was made to access the point; because the property owner at the end of the road does not own the property where the point is located and could not grant access.

SYNOPSIS OF 260 DEGREE RADIAL

This radial also runs through rural countryside. It was remarkably shorter than any of the other radials. Issues I found relating to particular points on this radial are as follows:

260-13.98 – This point was inaccessible and located on Galanos Farms which was gated with keypad entry only. No intercom or telephone; or any other means to contact owner. I left my business card on keypad box; but never heard back from the owner. Thus the times indicated in the DAIJ Report could not be duplicated.

260-16.58 – Reached the end of a county road, well short of the radial point; and encountered a locked gate with keypad entry. No way to contact property owner for access. In my opinion there is no way this measurement could have been made.

260-19.51 – The DAIJ filing indicates that this point was taken; however, it is quite a drive and a walk to make it down to the Brazos River bottom. Nevertheless, after obtaining the permission of the property owner, I was able to drive nearly all the way up to the river; then walk approximately .1 km along the river's edge to reach the radial. This measurement could have been made; but, I question why when there were other, better points available. I also question the usefulness of the measurement due to the high embankments on both sides of the river. Also, see next remark regarding driving time.

260-22.68 – The DAIJ filing indicates that the time from the 19.51 km point to this point was 8 minutes. By the time I was able to walk from the 19.51 km point to my vehicle, and drive around to the other side of the Brazos River; it took me over 30 minutes to reach this point. I traveled at the best possible speed; and even used a shorter (by time) route that I was aware of, in order to make it to this point. To get to the point where the measurement was taken; I had to walk from Terrace Rd. out to it. This took an additional 5 minutes. Thus the validity of the time in the DAIJ report is suspect.

260-25.69 – This point was inaccessible due to the fact that it is surrounded by gated, private property entrances. The timeline in the DAIJ filing indicates 10 minutes from the previous point to this one. Inasmuch as it would have required approximately 6 minutes to walk out of the previous point, 5 minutes to drive to this point and over 15 minutes to walk from the nearest public road to this point; the validity of the time in the DAIJ report is suspect.

260-38.73 – While this point is accessible; the property owner did not recall anyone desiring access to his property for the purposes of doing any sort of measurements. Thus the validity of this item in the DAIJ report is suspect.

SYNOPSIS OF 280 DEGREE RADIAL

Most of the points on this radial may have been accessible. However, note the interesting situation that seems to develop beginning with the 280-48.23 point. Issues I found relating to particular points on this radial are as follows:

280-18.04 – No access from FM 1736 or Rio Ranch. I did find a way to walk to the point from the end of Qualls Rd. It took me approximately 20 minutes to walk to the point from that location. At 1030 hrs CDT, I began an approximate 20 minute walk out, 1 km, to the radial. Although it was mostly through pasture land; I question that anyone made this measurement due to the difficulty of

the walk in. I had to negotiate several barbed-wire fences to make the walk to the point. No one stopped me; but, I was definitely on private property the entire time.

280-36.08 – This point was inaccessible due to the locked gate at 830 Walker League Rd. Even at that; reaching the point would have required at least a 15 minute walk in, due to the fact that it lies in a deep valley approximately .5 km from the road. There were no other points of access. Since a .5 km walk back to the road, over this terrain, would have required over 15 minutes to complete; the time indicated to arrive at the next point (280-39.48) is suspect.

280-39.48 – This point is accessible; however, it took me approximately 20 minutes to drive from the previous point and locate this point. The DAIJ filing shows a 10 minute interval between this point and the previous point. But, as noted in the previous paragraph; the time to walk out of the previous point and navigate to this point substantially exceeded the time indicated by DAIJ.

280-48.23 – The point is indicated to be off in extremely heavy brush just to the Northeast of Cock's Crow Rd. Accessibility of this point was questionable. However, this is where the DAIJ filing gets interesting. The filing shows that whoever took the measurement then travelled from this point to the 300-64.02 point in 10 minutes. This doesn't make any sense, given that the next point on this radial was only another 5 minute drive away. The DAIJ filing shows that the time to the 280-51.26 point was 14 minutes. Why not finish the last point on the radial; before moving to the next (presumably the 300 degree) radial? Nevertheless, when I attempted to drive to the 300-61.04 point; the drive, alone, took over 28 minutes to complete. The DAIJ filing indicates that this drive was made in 10 minutes! That would have included driving through the town of Somerville, Texas; with considerably reduced speed limits. Thus the validity of the times in the DAIJ Report is suspect.

280-51.26 – This point is accessible. However, the DAIJ filing indicates that whoever was taking the measurement again travelled from this point to the 300-60.95 point in 9 minutes. My travel time, by the most expeditious route and vehicle speeds was over 28 minutes. Thus the validity of the times in the DAIJ Report is suspect.

SYNOPSIS OF 300 DEGREE RADIAL

I began checking this radial at the end point (300-64.02) because I noticed that the times indicated in the DAIJ filing showed that this is what the individual taking the measurements had done. But, this entire radial consisted of numerous inaccessible or dubious points. Issues I found relating to particular points on this radial are as follows:

300-64.02 – I was able to get to this point via an open gate to a manned oilfield facility. The site manager was agreeable to me being on the site; even with hazardous work going on. The site is normally locked. But, access to the point still required an approximate .4 km walk in through extremely heavy brush country which made it unlikely that the individual taking the measurements was able to access this point.

The DAIJ timeline indicates that the individual taking the measurements left this point and travelled back to the 280-51.26 point in 4 minutes. So, I did the same thing; and the drive took me over 27 minutes to complete. This, again, raises questions about the validity of the data in the DAIJ Report.

300-60.95 – This point is accessible; although it required a nearly .2 km walk into the point. This measurement could have easily been done at the starting point; which was located on the pad of an oil well site. This walk, coupled with the exercise of travelling between points discussed above, makes the indicated time travelling to this point from the 280-51.26 absolutely questionable.

300-57.68 – This point was accessible only on foot; due to a locked gate on FM 1361. I did not attempt to walk this one in due to the Texas-summertime heat factor. It would have required at least a .8 km walk; which would have taken at least 10 minutes. Coupled with the driving time from the previous point; this would make the indicated time of 3 minutes from the previous point to this point highly suspect.

300-54.04 – This point was completely inaccessible. In attempting to get to the point; I encountered a locked gate on a private road well before I got anywhere near the point. Any kind of walk into the point would have been approximately 2 km, or more. After considerable effort; I could not locate any other possible access locations. Thus the validity of the time of 12 minutes indicated in the DAIJ Report is questionable.

300-50.64 – This point was accessible; although it would have required a walk in of over 1.1 km. It would have taken over 15 minutes to make the walk into the point. Given the fact that the 300-54.04 km point was completely inaccessible; the indicated travel time of 8 minutes from the previous point to this point is suspect. The driving time, alone, to reach the access location to this point is over 25 minutes. Thus the validity of the time indicated in the DAIJ Report is questionable.

300-47.57 – This was another strange location for a measurement point and another one where the timeline is suspect. To get to this point, just from the previous point's access location, took over 20 minutes and it required that I drive all the way into private (although openly accessible) property. The measurement point required that I drive .78 km down an unimproved power line right-of-way, past the point where the power lines turned away from the right-of-way, just to reach the point. While it was arguably accessible; I question whether this was an actual measurement point when there were better, more accessible points readily available.

300-44.29 – This point was accessible by vehicle; although it was taken on private property very near cross-country power lines. There were better points in a park nearby. Thus, again while it was arguably accessible; I question whether this was an actual measurement point when there were better, more accessible points readily available.

300-41.73 – This point is only accessible on foot due to a locked gate on a road that leads to an oil well site; which would have been the easiest and most sensible way to access the point. It took me approximately 17 minutes to walk to the oil well site and out to the radial. The DAIJ filing shows a time between the previous point and this point of only 9 minutes. Thus the validity of the time indicated in the DAIJ Report is questionable.

300-38.43 – This point is located inside a large ranch, and is only accessible only on foot. However, the property owner (Bruce) stated that no one has been on his property taking any kind of measurements. Even so, the time required to walk out from the previous point, drive to and gain access to this point does not agree with the time of 9 minutes indicated in the DAIJ filing. Thus the validity of the time indicated in the DAIJ Report is questionable.

300-35.47 – This point is inaccessible. The point is over .2 km from Palestine Rd. through heavy brush. The property owner, Mr. Roy Schrader, stated that no one has been on his property conducting any kind of measurements. Thus the validity of the data indicated in the DAIJ Report is questionable.

300-25.65 – This point is inaccessible. It is located on private property, off of FM 1155, and the access is blocked by a keypad-controlled gate to the GD Ranch, with no way of hailing the property owner. Thus the validity of the data indicated in the DAIJ Report is questionable.

300-22.74 – This point is only accessible on foot and is located on private property. I encountered a locked gate to the C & P Ranch at 2301 Running Valley Rd. Thus the validity of the data indicated in the DAIJ Report is questionable.

300-19.87 – This point is only accessible on foot and is located on a large ranch. Although the previous point was more than likely not accomplished; the time indicated in the DAIJ filing to reach this point from the previous point is shown to be 7 minutes. The driving time, alone, to reach the access location to walk to this point is more than 10 minutes. The time to walk into the point would be at least an additional 10 minutes. The property owners did not recall anyone requesting access to their property for the purposes of taking any kind of measurements. Thus the validity of the data indicated in the DAIJ Report is questionable.

300-16.10 – This point is inaccessible from the farm trail that is closest to it due to a locked gate on FM 1736. If access was attempted from Rock Island Rd. the property owner stated that they were not aware of anyone coming onto their property to get to it. Thus the validity of the data indicated in the DAIJ Report is questionable.

300-13.20 – This point is only accessible on foot; and only through private property. Property owners Larry and Ruth Hardy stated that no one has been on their property to make any measurements. Thus the validity of the data indicated in the DAIJ Report is questionable

SYNOPSIS OF 320 DEGREE RADIAL

This radial also has many discrepancies in terms of both accessibility and indicated times. While I have some questions about other closer-in points; I began checking this radial at the 16.10 km point. My reason for this is that I was beginning to notice that points that were further out on the previously studied radials were the most questionable. Issues I found relating to particular points on this radial are as follows:

320-16.10 – This point is on the East side of the Brazos River. It is completely inaccessible due to the fact that the road it is located on, or near, is no longer accessible. The access from SH 6 is gated and it is more than a 1.5 km walk into the point. Thus the validity of the data indicated in the DAIJ Report is questionable.

320-26.42 – This point is only accessible on foot. It took me approximately 10 minutes to walk into the point, with the permission of the property owner; who did not recall anyone desiring access to his property for the purposes of doing any measurements. Further, the DAIJ filing indicates that the trip from the previously inaccessible point to this point was 27 minutes. That might be a fairly accurate amount of driving time. However, when coupled with the time required to walk into the point; and the fact that the previous point was inaccessible; the time indicated for this point is highly questionable.

320-25.60 – This point is inaccessible due to a locked gate with keypad access only. No way to hail the property owner. Thus the validity of the data indicated in the DAIJ Report is questionable

320-20.81 – This point is accessible; but, it is on private, albeit open property. I encountered the property foreman, Bobby Nabors, who did not recall anyone requesting access. Thus the validity of the data indicated in the DAIJ Report is questionable

320-32.11 – This point is probably accessible; but, not from the nearby road. The hedgerow is simply too thick. I did discover that it could be accessed, by vehicle, through a gate further up the road. When I queried the property owners about whether anyone had requested access; they stated that they are away from the property, during the months indicated in the DAIJ filing. The gate is locked and the property is not accessible by vehicle. Thus the validity of the data indicated in the DAIJ Report is questionable.

320-45.66 – This point is only accessible on foot; and cannot possibly be reached in the time indicated in the DAIJ filing. I was able to drive most of the way into a farm and up to a curve on Bob Moore Rd. From there, the point was another .73 km from the gate. Thus the validity of the data indicated in the DAIJ Report is questionable.

320-49.08 – This point is inaccessible. I was able to drive several miles on High Prairie Rd. but I eventually encountered a gate with only keypad access, well before I reached the point. While a call box was available; I was unable to get through to anyone who could grant access. Thus the validity of the data indicated in the DAIJ Report is questionable.

320-64.99 – Locked gate on Lightsey Lane. Walked into point. Took approximately 5 minutes.

320-67.63 – Inaccessible. Locked gate on Jones Rd.. Point is another .73 km into brush countryside. The time required to drive to and walk in to this point of 30 minutes would have exceeded the time of 10 minutes shown in the DAIJ filing. Thus the validity of the data indicated in the DAIJ Report is questionable

320-71.36 – Encountered an inquisitive neighbor who watches the property, where this point is located, during the day. While the point is accessible; the time shown to get from the previous point

to this point of over 32 minutes would have exceeded the time of 11 minutes indicated in the DAIJ filing. Thus the validity of the data indicated in the DAIJ Report is questionable

CONCLUSION

After having done this analysis, it is my opinion that the DAIJ filing contains many discrepancies; both in terms of time and accessibility of the points. These discrepancies raise serious questions about the validity of the data in the DAIJ report.

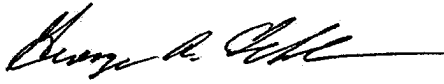
There are the obvious questions as to why measurements were made in such physically and otherwise difficult-to-reach locations; when there were plenty of accessible points, in publicly accessible locations, that would have yielded equally good measurements. The locations of many points, call into question whether those measurements (if indeed they were made) are good points of measurement for the sake of conducting a feasibility study; as was being done by DAIJ, for their filing. Points were identified in the most inaccessible locations making it difficult, if not impossible, for anyone else to be able to duplicate (and thereby verify the accuracy of) the measurements. The best scientific practices dictate that, for data to be factual, it must be repeatable. With better locations for points being available, I would submit that the selection of the locations that were selected as points (in areas of dense brush, near power line right-of-ways and in ravines) indicates that the individual taking the measurements was deliberately seeking lower measurement values that would produce skewed results favorable to the KRCM application.

But, the largest and most pronounced discrepancies are in the indicated times shown in the DAIJ filing. I am very familiar with the area in which these measurements were done. I am familiar with all of the major roadways, nearly all the secondary roadways and even many of the back roads. I have lived in the area my entire life; and have lived on rural property. I already had an idea of how long it normally takes for a grown man to walk across this countryside; but, I took the time to actually walk in to many of the more questionable points that were only accessible on foot, to verify the times in the DAIJ filing. The requirement that access can only be gained through considerable effort, again, begs the question of why these points were selected for measurement points. Since the measurements should have been made between the time window two hours after local sunrise, and two hours prior to local sunset; it would have been physically difficult, if not impossible, to accomplish the measurements on the timeline shown in the filing.

Finally, my conversations with several property owners indicated that no measurements were ever taken on their premises. While it has been nearly two years since these measurements were ostensibly done; nearly all of the people I spoke with were unequivocal in their statements that no one had requested access to their property. Even so, I left each of them my business card; just in case they happened to remember something contrary to what they told me. To-date, I have not heard from a single one.

Based on my analysis of the points in the DAIJ Report, it appears that the individual who prepared the conductivity exhibit simply took a few measurements close in to the test transmitter location;

then plotted additional points on a map and extrapolated data that fit his purposes in making the filing.

A handwritten signature in black ink, appearing to read "George Schank", with a long horizontal flourish extending to the right.

George Schank
Broadcast Site Management, LLC

Attachment B

BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE
DAVID J. PINION, PE
ERIK C. SWANSON, PE

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PAUL W. LEONARD, PE
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ENGINEERING STATEMENT

In Support of an

INFORMAL OBJECTION

to an Application to

Modify a Construction Permit (BMP-20130426ABP)

Dated April 29, 2013

As Amended

November 4, 2013

KRCM-AM

Shenandoah, TX

Entercom License, LLC

December 2013

This Engineering Statement has been prepared on behalf of Entercom License, LLC, licensee of Class B AM station KJCE Rollingwood, TX in support of an Informal Objection to an Application to Modify a Construction Permit (File No. BMP-20130426ABP) by DAIJ Media, LLC, as amended November 4, 2013. The Construction Permit (File No. BP-20120110AEV) authorizes a new transmitter site and power increase for KRCM-AM, Shenandoah, TX. KRCM operates on 1380 kHz, a channel first-adjacent to KJCE.

Acceptability of Entercom Supplied Field Strength Data

In its engineering statement dated September, 2013 (included in Daij's Opposition to Informal Objection dated Nov 3, 2013) DAIJ's technical consultant opines that Entercom's measurement data was not obtained in a manner acceptable to the Commission, as the field strength meter used to obtain this data had not been calibrated within two years of the dates on which the measurements were taken. As previously stated (Statement of George A. Schank dated May 15, 2013) the meter used, a Potomac Instruments FIM-41 serial number 1264, was checked against another meter prior to the making of the measurements supplied in Entercom's previous informal objection. The details of this comparison are as follows:

In May of 2013, prior to the measurements, Mr. John Price, Assistant to the Vice President-Technology for Entercom, brought FIM-41 serial No. 1264 (the Entercom FIM) to the offices of Hatfield & Dawson, where it was compared with another Potomac Instruments FIM-41, serial No. 647 (the H&D FIM). Various measurements, including measurements on 1380 kHz, were made with both meters, and it was noted that these measurements were in substantial agreement. The H&D FIM was calibrated by Potomac Instruments on April 11, 2013. Following this verification, the Entercom FIM was shipped to Austin for Mr. Schank's measurements.

Acceptability of DAIJ Supplied Field Strength Data

The field strength meter used to obtain DAIJ's measurement data, an FIM-41, serial number 1702 (the DAIJ FIM) suffers from the same deficiency that, according to DAIJ's consultant, makes Entercom's measurements unacceptable in that it was not calibrated within 2 years of the taking of the measurements in question. DAIJ attempts to rectify this shortcoming via comparison of the DAIJ FIM to an FIM-21 of more recent calibration. The obvious problem with this method is that the test transmitter authorized by KR5XCM operated at 1680 kHz, a frequency at the upper end of the expanded AM band, while the FIM-21 does not operate at frequencies above 1600 kHz, and therefore could not possibly have been used to verify the accuracy of the DAIJ FIM at the test frequency. Furthermore, examination of the data sheets submitted with the DAIJ application¹ clearly demonstrate that DAIJ violated the express conditions of test transmitter authorization KR5XCM on November 23 and 26, 2011 as well as December 10, 2011 by operating the test transmitter outside the authorized "Non-critical daytime hours only". According to the tool found on the Commission's web site at <http://www.fcc.gov/mb/audio/bickel/srsstime.html>, at the coordinates specified in the STA authorizing DAIJ to operate a test transmitter on 1680 kHz, local sunset time in both November and December is 5:30 PM CST. Therefore, afternoon critical hours begin at 3:30 PM CST. Local sunrise in November occurs at 6:45 AM, therefore morning critical hours end at 8:45 AM CST. Examination of the measurement data sheets submitted by DAIJ show that on November 23, 2011 the test transmitter was operational until at least 3:46PM. On November 26 operation began no later than 8:31AM, and on December 10, 2011 it was operational until at least 3:52PM.

As DAIJ violated the explicit terms of its test transmitter authorization, and made its measurements with an uncalibrated and unverified instrument, the DAIJ measurements lack credibility and should not be trusted. Staff should evaluate the KRCM application using M3 ground conductivity data and dismiss the DAIJ application due to prohibited contour overlap with KJCE.

¹BP-20120110AEV Exhibit/Attachment 17 "KRCM Groundwave Exhibit"

Statement of Engineer

This Engineering Statement, relative to an Informal Objection to an Application to Modify a Construction Permit (File No. BMP-20130426ABP) for a new transmitter site and power increase for KRCM, Shenandoah, TX has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am an engineer in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Oregon.

December 9, 2013



Thomas S. Gorton P.E.

Attachment C

DECLARATION OF JOHN W. PRICE

I, John W. Price, under penalty of perjury, hereby declare that the following is true and correct. I understand that this Declaration will be submitted to the Federal Communications Commission ("FCC").

1. I am the Assistant to the Vice President—Technology for Entercom Communications Corp ("Entercom").

2. On May 6, 2013, Tom Gorton of Hatfield and Dawson and I compared the performance of our Potomac Instruments Field Intensity Meters. Entercom's meter is a type FIM-41 with the serial number is 1264. Mr. Gorton and I measured KIRO 710 kHz, KBLE 1050 kHz and KRKO 1380 kHz with our respective meters. Both meters indicated 30mV/m on KIRO. Both meters indicated 9mV/m on KBLE. Entercom's meter indicated a little under 2mV/m for KRKO. Hatfield and Dawson's meter indicated about 2.1mV/m for KRKO. The calibration date on the Hatfield and Dawson meter was April 11, 2013.

December 6, 2013

Date



John W. Price
Assistant to VP—Technology
Entercom Communications Corp.

Attachment D

POTOMAC INSTRUMENTS, inc.
Frederick, Maryland

CERTIFICATE OF CALIBRATION

Field Intensity Meter Type FIM-41

Serial Number 647

This instrument was calibrated in an induction field of 220.0 millivolts per meter. At each measurement frequency the measured field was recorded and a correction factor K was computed; the indicated field must be multiplied by K to obtain the true field.

<u>kHz</u>	<u>K</u>	<u>kHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>
540	1.000	1100	1.000	1.6	1.005	3.5	1.005
600	1.000	1200	1.005	1.9	1.009	3.8	1.005
700	1.000	1300	1.000	2.2	1.009	4.1	1.009
800	0.995	1400	1.000	2.5	1.009	4.4	1.009
900	1.000	1500	0.995	2.8	1.009	4.7	1.005
1000	1.000	1600	0.995	3.2	1.000	5.0	1.005

The calibrating field is maintained equal to the National Institute of Standards and Technology (NIST) standard field within an accuracy of 1.0 percent. NIST states that the absolute accuracy of its field is "believed to be within 3.0 percent."

The error at points on the meter scale other than the calibration point is less than 3.0 percent. The attenuator ratios are correct within 2.0 percent. These accuracies apply for battery voltages that are indicated by the instrument's battery check circuit to be useable.

NEXT RECOMMENDED CALIBRATION DATE: April 11, 2015

Calibrated by

Darryl Thompson

Date: Apr. 11, 2013

STATE OF MARYLAND

Technician Darryl Thompson, personally appeared before me on Apr. 12, 2013, and testified under oath that the above calibration was made either by himself or under his direction and that the statements in the above certificate are true to the best of his knowledge and belief.



Marcella R. Laliberte
Notary Public