

FEDERAL COMMUNICATIONS COMMISSION  
 CLASS OF STATION FM

STH

The following application is submitted for action by the Chief, Broadcast Bureau.

ST	FILE NUMBER	CALL	APPLICANT AND LOCATION	NATURE OF APPLICATION
PA	BPED -910701MA N/M	NEW 91.7MHZ	BUX-MONT EDUCATIONAL RADIO DOYLESTOWN PA	CP FOR NEW EDUCATIONAL FM ON: FREQUENCY: 91.7 MHZ; ERP: .032 KW H&V; HAAT: 59 METERS H&V 40 19 33 75 10 20

*Shirley T Hall*  
 CHIEF, LICENSE DIVISION

LICENSE EXPIRATION DATE 7-11-91

RECOMMENDATION: GRANT( ) CONSTRUCTION DATES, START \_\_\_\_\_ END \_\_\_\_\_  
 CONTESTED ( ) UNCONTESTED ( )

*Entered  
7.11.91*

APPROVED \_\_\_\_\_  
*[Signature]*

FOR CHIEF, BROADCAST BUREAU  
 F.C.C.-WASHINGTON, D.C.

FCC 340

Code 30  
PN: 7-11-91

Approved by OMB  
3080-0034  
Expires 4/30/92

See Page 23 for information regarding public burden estimate

APPLICATION FOR CONSTRUCTION PERMIT FOR  
NONCOMMERCIAL EDUCATIONAL BROADCAST STATION  
(Carefully read instructions before filing form) Return only form to FCC

JUL 3 3 08 PM '91

For Commission Use Only  
File No. **BPED-910701mA**

Section I - GENERAL INFORMATION

1. Name of Applicant <b>BUX-MONT EDUCATIONAL RADIO ASSOCIATION</b>		
Street Address or P.O. Box <b>P.O. Box 2012</b>		
City <b>Warminster</b>	State <b>PA</b>	ZIP Code <b>18974</b>
Telephone No. (Include Area Code) <b>(215) 674-8002</b>		

Send notices and communications to the following person at the address below:		
Name <b>Charles W. Loughery</b>		
Street Address or P.O. Box <b>741 Cybus Way</b>		
City <b>Southampton</b>	State <b>PA</b>	ZIP Code <b>18966</b>
Telephone No. (Include Area Code) <b>(215) 357-5105 (609) 530-5134</b>		

2. This application is for:  AM  FM  TV

(a) Channel No. or Frequency <b>219 91.7MHz</b>
--

(b) Principal Community	City	State
	<b>Doylestown</b>	<b>PA</b>

(c) Check one of the following boxes:

- Application for **NEW** station
- MAJOR** change in licensed facilities; call sign: \_\_\_\_\_
- MINOR** change in licensed facilities; call sign: \_\_\_\_\_
- MAJOR** modification of construction permit; call sign: \_\_\_\_\_  
File No. of construction permit: \_\_\_\_\_
- MINOR** modification of construction permit; call sign: \_\_\_\_\_  
File No. of construction permit: \_\_\_\_\_
- AMENDMENT** to pending application; application file number: \_\_\_\_\_

**NOTE:** It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive

**BPED -910701MA NEW**  
**DOYLESTOWN PA**  
**BUX-MONT EDUCATIONAL RADIO**

Yes  No

If Yes, state:	Call letters	City	State
	<b>WBMR</b>	<b>Telford</b>	<b>PA</b>

Section II - LEGAL QUALIFICATIONS

Name of Applicant

BUX-MONT EDUCATIONAL RADIO ASSOCIATION

1. Applicant is: (Check one box below)

- (a) governmental or public educational agency, board or institution
(b) private nonprofit educational institution
(x) (c) Other (specify) Non-profit Corporation

2. For applicants 1(c) only, describe in an Exhibit the nature and educational purposes of the applicant.

Exhibit No. L-1

3. For applicants 1(c) applying for a new noncommercial educational television station only, describe in an Exhibit how the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural and civic segments of the principal community to be served.

Exhibit No. N/A

4. Describe in an Exhibit how the proposed station will be used, in accordance with 47 C.F.R. Section 73.503 or Section 73.621, for the advancement of an educational program.

Exhibit No. L-2

5. Is there any provision contained in any by-laws, articles of incorporation, partnership agreement, charter, statute or other document which would restrict the applicant in advancing an educational program or complying with any Commission rule, policy or provision of the Communications Act of 1934, as amended?

Yes No (XX)

If Yes, provide particulars in an Exhibit.

Exhibit No. N/A

CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS

6. (a) Is the applicant in violation of the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments? (See Instruction B to Section II)

Yes No (X)

(b) Will any funds, credits or other financial assistance for the construction, purchase or operation of the station(s) be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents?

Yes No (X)

If the answer to (b) above is Yes, attach an Exhibit giving full disclosure concerning this assistance.

Exhibit No. N/A

7. (a) Has an adverse finding been made or an adverse final action taken by any court or administrative body as to the applicant or any party to this application in a civil or criminal proceeding brought under the provisions of any law related to the following:

Any felony; broadcast related antitrust or unfair competition; criminal fraud or fraud before another governmental unit; or discrimination?

Yes No (X)

(b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in (a) above?

Yes No (X)

If the answer to (a) and/or (b) above is Yes, attach an Exhibit giving full disclosure concerning persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), a statement of the facts upon which the proceeding is or was based or the nature of the offense alleged or committed, and a description of the current status or disposition of the matter.

Exhibit No. N/A

## PARTIES TO APPLICATION

8. Complete the following Table with respect to all parties to this application:

(NOTE: If the applicant considers that to furnish complete information would pose an unreasonable burden, it may request that the Commission waive the strict terms of this requirement with appropriate justification.)

INSTRUCTIONS: If applicant is a corporation or an unincorporated association with 50 or fewer stockholders, stock subscribers, holders of membership certificate or other ownership interest, fill out all columns, giving the information requested as to all officers, directors and members of governing board. In addition, give the information as to all persons or entities who are the beneficial or record owners of or have the right to vote capital stock, membership or ownership interests or are subscribers to such interests. If the applicant has more than 50 stockholders, stock subscribers or holders of membership certificates or other ownership interests, furnish the information as to officers, directors, members of governing board, and all persons or entities who are the beneficial or record owners of or have the right to vote 1% or more of the capital stock, membership or ownership interests. If applicant is a governmental or public educational agency, board or institution, fill out columns (a), (b), and (c) as to all members of the governing board and chief executive officers.

Name and Residence Address(es)	Office Held	Director or Member of Governing Board		% of: Ownership (O) or Voting Stock (VS) or Membership (M)
		YES	NO	
(a)	(b)	(c)		(d)
Charles W. Loughery Southampton, Pa	Trustee/President	X		Non-Stock Corporation
Kenneth S. Crowther Huntingdon Valley, Pa	Trustee/Vice Pres.	X		"
Todd Allen Creland, Pa	Trustee/Treasurer	X		"
Frank W. Napurano Hopewell, N.J.	Trustee/Secretary	X		"
Ronald M. Rysztogi Bensalem, Pa	Trustee	X		"
Charles H. Gainer Warminster, Pa	Trustee	X		"

**Section II - LEGAL QUALIFICATIONS (Page 3)**

9. Does the applicant or any party to this application have, or have they had, any interest in:

- (a) a broadcast station, or pending broadcast station application before the Commission?  Yes  No
- (b) a broadcast application which has been dismissed with prejudice by the Commission?  Yes  No
- (c) a broadcast application which has been denied by the Commission?  Yes  No
- (d) a broadcast station, the license of which has been revoked?  Yes  No
- (e) a broadcast application in any pending or concluded Commission proceeding which left unresolved character issues against the applicant?  Yes  No

If the answer to any of the questions in (a)-(e) above is Yes, state in an Exhibit the following information:

Exhibit No. L-3
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- (1) Name of party having interest;
- (2) Nature of interest or connection, giving dates;
- (3) Call letters of stations or file number of application or docket; and
- (4) Location.

### SECTION III - FINANCIAL QUALIFICATIONS

Note: If this application is for a change in an operating facility, DO NOT fill out this Section.

1. Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration?  Yes  No
2. Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision?  Yes  No

NOTE: If either Questions 1 or 2 is answered "Yes," your application cannot be granted until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on your part is required. If you rely on funds from a source specified in Question 2, **you must advise the F.C.C. when the funds are committed or appropriated.** This should be accomplished by letter amendment to your application, in triplicate, signed in the same manner as the original application, and clearly identifying the application to be amended.

3. The applicant certifies, except as noted above, that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without additional funds.  Yes  No

### SECTION IV - PROGRAM SERVICE STATEMENT

Attach as an Exhibit, a brief description, in narrative form, of the planned programming service relating to the issues of public concern facing the proposed service area.

Exhibit No. P-1
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NOTE: No program service statement need be filed where the proposed station's programming would be **wholly** "instructional" as that type of programming is defined in the Instructions to this Section.

**SECTION VI – EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**

1. Does the applicant propose to employ five or more full-time employees?  Yes  No

If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Program Report (FCC 396-A).

**SECTION VII – CERTIFICATION**

1. Has or will the applicant comply with the public notice requirements of 47 C.F.R. Section 73.3580?  Yes  No

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

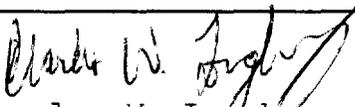
The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.**

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

Name of Applicant <b>BUX-MONT EDUCATIONAL RADIO ASSOCIATION</b>	Title <b>President</b>
Signature  <b>Charles W. Loughery</b>	Date <b>27 June 1991</b>

**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 principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information 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. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 76 to 80 hours with an average of 78 hours 04 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, Office of Managing Director, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0034), Washington, D.C. 20503.

**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.**

## EXHIBIT L-1

The Bux-Mont Educational Radio Association was created in 1979 to operate as the Licensee, WRDV Warminster, Pa. (formerly WCSD-FM). The purpose of the corporation is to provide programs of civic need and interest within the listening area, and also to provide an opportunity for beginners to enter the field of broadcasting. The staff is completely volunteer and is comprised largely of individuals seeking a career in broadcasting.

EXHIBIT L-2

The station will air programs that both educate and inform the public on issues of pressing local and regional concern. Airtime will be made available to public and private schools as well as local governments and civic groups so that issues can be presented in a balanced fashion.

The all volunteer staff which consists largely of newcomers to broadcasting will receive "hands on training" in the art of radio broadcasting as well as ongoing instruction and guidance on radio programming and delivery of this programming to the public.

EXHIBIT L-3

The applicant is Licensee of Non-commercial Ed FM WRDV, Warminster, Pa. It is also Permittee of Non-commercial Ed FM WBYO, Sellersville, Pa. An application to construct a new Non-commercial Ed FM at Bristol, Pa. is pending.

Frank W. Napurano and Charles W. Loughery are President/Trustee and Vice-President/Trustee respectively of WDVR Delaware Township, N.J. (WDVR is presently operating under program test authority)

Charles W. Loughery is permittee of W08CR Low Power television station at Warminster, Pa.

Charles W. Loughery was an applicant for a new commercial FM at Northumberland, Pa (BPH-870827NI) MM Docket 88-304. This application was dismissed with prejudice pursuant to a settlement agreement approved by the presiding ALJ in August of 1989.

## EXHIBIT P-1

The program service has been described in part in Exhibits L-1 and L-2. Programing that deals with issues will be selected and produced as issues arise. These issues will be determined through consultation with community leaders and organizations. Air time will be made available on request to local governments for the purpose of broadcasting special meetings and hearings on important local issues. The applicant currently operates Non-commercial ED FM WRDV, Warminster, Pa. and proposes to operate the proposed facility as a satellite of WRDV, duplicating most of it's programing but at the same time providing the technical feasibility to feed the Doylestown transmitter by separate STL so as to make possible separate programing to Doylestown. The applicant currently has satellite authority for WBYO, Sellersville to operate from the Warminster studios. Much of the issues facing the WRDV area are the very same issues facing the Doylestown area because the two communities are only about 7 miles apart and Doylestown is the County seat of Bucks County. Warminster is in Bucks County.

**BUX-MONT EDUCATIONAL RADIO ASSOCIATION**

**WARMINSTER, PENNSYLVANIA**

**APPLICATION FOR NEW  
NON-COMMERCIAL EDUCATIONAL FM BROADCAST STATION  
AT DOYLESTOWN, PENNSYLVANIA**

**FCC 340 V-B  
FCC 340 V-G  
EXHIBIT EE-1**

**CHARLES W. LOUGHERY  
741 CYBUS WAY  
SOUTHAMPTON, PENNSYLVANIA 18966**

<b>Section V-B - FM BROADCAST ENGINEERING DATA</b>	<b>FOR COMMISSION USE ONLY</b> File No. _____ ASB Referral Date _____ Referred by _____
--	--

Name of Applicant

**BUX-MCNT EDUCATIONAL RADIO ASSOCIATION**

Call letters *(if issued)*

Is this application being filed in response to a window?  Yes  No

If Yes, specify closing date: \_\_\_\_\_

Purpose of Application: *(check appropriate boxes)*

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Construct a new (main) facility            | <input type="checkbox"/> Construct a new auxiliary facility                         |
| <input type="checkbox"/> Modify existing construction permit for main facility | <input type="checkbox"/> Modify existing construction permit for auxiliary facility |
| <input type="checkbox"/> Modify licensed main facility                         | <input type="checkbox"/> Modify licensed auxiliary facility                         |

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

- |   |   |
|---|---|
| <input type="checkbox"/> Antenna supporting-structure height  | <input type="checkbox"/> Effective radiated power         |
| <input type="checkbox"/> Antenna height above average terrain | <input type="checkbox"/> Frequency                        |
| <input type="checkbox"/> Antenna location                     | <input type="checkbox"/> Class                            |
| <input type="checkbox"/> Main Studio location                 | <input type="checkbox"/> Other <i>(Summarize briefly)</i> |

File Number(s) \_\_\_\_\_

1. Allocation:

Channel No.	Principal community to be served:			Class <i>(check only one box below)</i>
219	City Doylestown	County Bucks	State PA	<input checked="" type="checkbox"/> A <input type="checkbox"/> B1 <input type="checkbox"/> B <input type="checkbox"/> C3 <input type="checkbox"/> C2 <input type="checkbox"/> C1 <input type="checkbox"/> C <input type="checkbox"/> D

2. Exact location of antenna.

(a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.

**AT&T Tower, 2.4 miles west of Doylestown Boro center**

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	40°	19'	33"	Longitude	75°	10'	20"
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3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)?  Yes  No

If Yes, give call letter(s) or file number(s) or both.

WPB 74, New Britain, PA.

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any.

N/A

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates?  Yes  No  
 If Yes, list old coordinates.

Latitude            °            '            "	Longitude           °            '            "
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5. Has the FAA been notified of the proposed construction?  Yes  No  
 If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Exhibit No. N/A
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Date \_\_\_\_\_ Office where filed \_\_\_\_\_

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

Landing Area	Distance (km)	Bearing (degrees True)
(a) <u>Central Bucks County</u>	<u>4.35</u>	<u>84</u>
(b) _____	_____	_____

7. (a) Elevation: *(to the nearest meter)*

(1) of site above mean sea level; 153 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 97 meters

(3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] 250 meters

(b) Height of radiation center: *(to the nearest meter)* H = Horizontal; V = Vertical

(1) above ground 22 meters (H)

22 meters (V)

(2) above mean sea level [(aX1) + (bX1)] 175 meters

175 meters (V)

(3) above average terrain 59 meters (H)

59 meters (V)

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(bX3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of FM radiator.

Exhibit No. EE-1
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9. Effective Radiated Power:

(a) ERP in the horizontal plane .032 kw (H\*) .032 kw (V\*)

(b) Is beam tilt proposed?  Yes  No

If Yes, specify maximum ERP in the plane of the tilted beam, and attach as an Exhibit a vertical elevational plot of radiated field.

Exhibit No. N/A
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\_\_\_\_\_ kw (H\*) \_\_\_\_\_ kw (V\*)

\*Polarization

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 3)

10. Is a directional antenna proposed?

Yes  No

If Yes, attach as an Exhibit a statement with all data specified in 47 C.F.R. Section 73.316, including plot(s) and tabulations of horizontally and vertically polarized radiated components in terms of relative field.

Exhibit No.  
N/A

11. Will the main studio be located within the 70 dBu or 3.16 mV/m contour?

Yes  No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.  
S-1

12. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters, or any nonbroadcast (except citizens band or amateur) radio stations; or (b) within the blanketing contour, any established commercial or government receiving stations, cable head-end facilities, or populated areas; or (c) within ten (10) kilometers of the proposed antenna, any proposed or authorized FM or TV transmitters which may produce receiver-induced intermodulation interference?

Yes  No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by receiver-induced or other types of modulation) to facilities in existence or authorized or to radio receivers in use prior to grant of this application. (See 47 C.F.R. Sections 73.315(b), 73.316(d) and 73.318.)

Exhibit No.  
EE-1

13. Attach as an Exhibit a 7.5 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction D for Section V. Further, the map must clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.  
EE-1

14. Attach as an Exhibit (name the source) a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.  
EE-1

(a) the proposed transmitter location, and the radials along with profile graphs have been prepared;

(b) the 1 mV/m predicted contour and, for noncommercial educational applicants applying on a commercial channel, the 3.16 mV/m contour; and

(c) the legal boundaries of the principal community to be served.

15. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 117.4 sq. km. Population 37,734

16. Attach as an Exhibit a map (Sectional Aeronautical charts where obtainable) showing the present and proposed 1 mV/m (60 dbu) contours.

Exhibit No.  
N/A

NEW STATION

Enter the following from Exhibit above: Gain Area \_\_\_\_\_ sq. mi.  
Loss Area \_\_\_\_\_ sq. mi.

Percent change (gain area plus loss area as percentage of present area) \_\_\_\_\_ %.

If 50% or more this constitutes a major change. Indicate in question 2(c), Section I, accordingly.

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 4)

17. For an application involving an auxiliary facility only, attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent*) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.  
N/A

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license. See 47 C.F.R. Section 73.1675. (File No.: \_\_\_\_\_)

18. Terrain and coverage data (*to be calculated in accordance with 47 C.F.R. Section 73.3131*).

Source of terrain data: (*check only one box below*)

Linearly interpolated 30-second database  7.5 minute topographic map

(Source: Dataworld)

Other (*briefly summarize*)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances to the 1 mV/m contour (kilometers)
0	43	5.15
45	48	5.33
90	81	6.92
135	94	7.63
180	84	7.11
225	77	6.72
270	24	4.31
315	20	4.31

**Allocation Studies**

(*See Subpart C of 47 C.F.R. Part 73*)

19. Is the proposed antenna location within 320 kilometers (199 miles) of the common border between the United States and Mexico?

Yes  No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.

Exhibit No.  
N/A

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 5)

20. Is the proposed antenna location within 320 kilometers of the common border between the United States and Canada?  Yes  No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Working Agreement for Allocation of FM Broadcasting Stations on Channels 201-300 under The Canada-United States FM Agreement of 1947.

Exhibit No.  
N/A

21. If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as an Exhibit a complete allocation study to establish the lack of prohibited overlap of contours with other U.S. stations. The allocation study should include the following:

Exhibit No.  
EE-1

- (a) The normally protected interference-free and the interfering contours for the proposed operation along all azimuths.
- (b) Complete normally protected interference-free contours of all other proposals and existing stations to which objectionable interference would be caused.
- (c) Interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.
- (d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing stations, which require study to show the absence of objectionable interference.
- (e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers and operating or proposed facilities.
- (f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.
- (g) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire Exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (h) The name of the map(s) used in the Exhibit(s).

22. With regard to any stations separated by 53 or 54 channels (10.6 or 10.8 MHz) attach as an Exhibit information required in 1/ *(separation requirements involving intermediate frequency (i.f.) interference)*.

Exhibit No.  
EE-1

23.(a) Is the proposed operation on Channel 218, 219, or 220?

Yes  No

(b) If the answer to (a) is yes, does the proposed operation satisfy the requirements of 47 C.F.R. Section 73.207?

Yes  No

(c) If the answer to (b) is yes, attach as an Exhibit information required in 1/ regarding separation requirements with respect to stations on Channels 221, 222 and 223.

Exhibit No.  
EE-1

(d) If the answer to (b) is no, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose.

Exhibit No.  
N/A

1/ A showing that the proposed operation meets the minimum distance separation requirements. Include existing stations, proposed stations, and cities which appear in the Table of Allotments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 6)

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following:

Exhibit No.  
N/A

- (1) Protected and interfering contours, in all directions (360°), for the proposed operation.
- (2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as transmitter location.
- (3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.
- (4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (5) The official title(s) of the map(s) used in the exhibits(s).

24. Is the proposed station for a channel in the range from Channel 201 to 220 (88.1 through 91.9 MHz) and the proposed antenna location within the distance to an affected TV Channel 6 station(s) as defined in 47 C.F.R. Section 73.525?

Yes  No

If Yes, attach as an Exhibit either a TV Channel 6 agreement letter dated and signed by both parties or a map and an engineering statement with calculations demonstrating compliance with 47 C.F.R. Section 73.525 for each affected TV Channel 6 station.

Exhibit No.  
EE-1

25. Is the proposed station for a channel in the range from Channel 221 to 300 (92.1-107.9 MHz)?

Yes  No

If Yes, attach as an Exhibit information required in 1/. (Except for Class D (secondary) proposals.)

Exhibit No.  
N/A

26. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact?

Yes  No

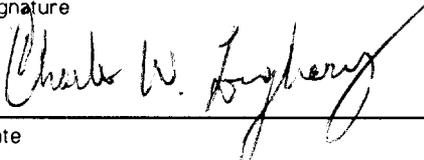
If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311.

Exhibit No.  
N/A

If No, explain briefly why not. See Exhibit EE-1

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) Charles W. Loughery	Relationship to Applicant (e.g., Consulting Engineer) President, Technical Director
Signature 	Address (Include ZIP Code) 741 Cybus Way Southampton, Pa. 18966
Date 27 June 1991	Telephone No. (Include Area Code) (215) 357-5105 (609) 530-5134

**BUX-MONT EDUCATIONAL RADIO ASSOCIATION  
APPLICANT FOR A NEW NON-COMMERCIAL FM STATION  
AT DOYLESTOWN, PENNSYLVANIA**

**APPLICATION FOR NEW  
NON-COMMERCIAL EDUCATIONAL FM BROADCAST STATION  
AT DOYLESTOWN, PENNSYLVANIA**

**EXHIBIT EE-1**

**CHARLES W. LOUGHERY  
741 CYBUS WAY  
SOUTHAMPTON, PENNSYLVANIA 18966**

**BUX-MONT EDUCATIONAL RADIO ASSOCIATION**

**DOYLESTOWN, PENNSYLVANIA**

**TABLE OF CONTENTS**

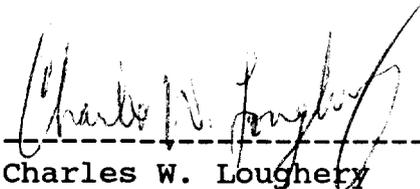
	<b><u>PAGE</u></b>	<b><u>FIGURE</u></b>	<b><u>TABLE</u></b>
DECLARATION	4		
ENGINEERING NARRATIVE	5		
ALLOCATIONS STUDY	5		1
CHANNEL 6 STUDY	7		2
ENVIRONMENTAL	9		
MAP OF THE PROPOSED 1 MV/M CONTOUR	11	1	
TOPOGRAPHICAL MAP OF TRANSMITTER SITE	12	2	
ALLOCATIONS STUDY	13	3	
CHANNEL 6 INTERFERENCE AREA	14	4	
ANTENNA VERTICAL PLAN	15	5	

**NEW NON-COMMERCIAL FM  
DOYLESTOWN, PENNSYLVANIA**

**DECLARATION**

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for Bux-Mont Educational Radio Association, applicant for a new non-commercial FM station at Doylestown, Pennsylvania and that all the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.

Executed on: 27 June 1991



-----

Charles W. Loughery  
741 Cybus Way  
Southampton, Pennsylvania 18966  
(215) 357-5105 (609) 530-5134

**BUX-MONT EDUCATIONAL RADIO ASSOCIATION**  
**APPLICANT FOR A NEW**  
**NON COMMERCIAL EDUCATIONAL FM STATION**  
**AT DOYLESTOWN, PENNSYLVANIA**

**ENGINEERING NARRATIVE**

**1. INTRODUCTION**

This exhibit supports the attached application of Bux-Mont Educational Radio Association for a new non-commercial FM broadcast station on Channel 219A (91.7 MHz) at Doylestown, Pennsylvania.

**2. FACILITIES REQUESTED**

This application proposes operation on Channel 219A with an ERP of 0.032 kilowatts Horizontal and 0.032 kilowatts vertical with an antenna 59 meters above average terrain. It should be noted that while this application proposes an ERP less than 100 watts, the applicant is in compliance with the minimum power requirements of 73.211 because 32 watts at 59 meters HAAT results in a 1Mv/m reference distance contour which is equal to 6 kilometers. Figure 1 shows the proposed 60 dBu coverage area while Figure 2 is the transmitter site plan.

**3. ALLOCATION STUDY**

Table 1 lists the stations studied as part of this

application. Distances to contours were determined utilizing the F(50-50) and F(50-10) FM curves as appropriate. Station facilities were based on data on file with the Commission while terrain information was determined using the NGDC 30 second database. The resultant distance to contours for each station are included herein.

**TABLE 1**

**DETAILED ALLOCATION STUDY**

<u>CHANNEL</u>	<u>STATION</u>	<u>LOCATION</u>
216	None	Sufficiently Close
218	None	Sufficiently Close
219A	WKDU	Philadelphia, PA
219A	WMUH	Allentown, PA
219A	NEW	Bristol, PA
220	None	Sufficiently Close
221	None	Sufficiently Close
222	None	Sufficiently Close
272	None	Sufficiently Close
273	None	Sufficiently Close

Clearances on channels 216 thru 220 are based on the effective field of the proposed new and all existing NCE-FM facilities and the appropriate terrain factors. Clearances on channels 221, 222, 272, and 273 are based on specific distances required by Part 73, Subpart B of the Rules.

Figure 3 shows the appropriate protected and interfering contours for the above stations. Detailed terrain 3-16 Km averaging over the pertinent arcs was employed. The power and height

proposed by the applicant provides the required protection to all existing FM stations as required by the Commission's Rules.

#### 4. PROTECTION OF CHANNEL 6

Using the procedures of Section 73.208(c), Distance was calculated to WPVI-TV, Channel 6 in Philadelphia, PA. No other Channel 6 stations are affected by this proposal. The distance to WPVI is:

<u>STATION</u>	<u>DISTANCE</u>	<u>AZIMUTH</u>
WPVI Philadelphia, PA.	32.66 km	190 DEGREES

In all cases the channel six service contours were studied using the F(50,50) curves and all interfering contours using the F(50,10) curves. Station facilities were based on data on file with the Commission while terrain information was determined using the NGDC 30 second database.

The study revealed the signal strength of channel six to be between 78 Dbu and 80 Dbu in the vicinity of the proposed site. For the purpose of this exhibit a uniform signal strength of 78 Dbu for channel six is assumed, thus representing a worst case scenario. It was decided to use this worst case scenario because of the very small area involved, in fact the F50/50 charts yield results less than 1.5 kilometers. Figure 2 of 73.599 imposes a protection ratio of 13.4 Dbu for a channel 219 operation as

proposed herein.

The proposed FM site is within the channel six grade A contour and is located in New Britain Township, a portion of the interference area also encroaches into Doylestown Township. Both of these communities have populations less than 50,000 persons. This being the case the following formula for mixed polarity was used:  $H(.032Kw) + V(.032Kw)/40 = P(.033Kw)$ , or 33 watts of equivalent horizontal power.

The interference to WPVI is that area created by the locus of the composite of the proposed FM 91.4 Dbu and 97.4 Dbu contours based on the equivalent horizontal power of 33 watts. The 97.4 Dbu contour is utilized over the arcs 70 degrees to 110 degrees and 250 degrees to 290 degrees relative to the orientation of WPVI from the proposed site. This adjustment is permitted by 73.525(e)(1)(iii) of the rules. The distances to both contours using the F(50/50) curves was less than 1.5 kilometers therefore the following free space formula was used to determine the distance to these contours:

$$\text{Where, } E = 106.92 - 20 \log(d) + \text{ERP}$$

E = free-space field (Dbu)

d = distance (km)

ERP = effective radiated power (DbK)

The resultant interference area is plotted on the pertinent portion of the U.S. 1980 Census Tracts Map for the Philadelphia Standard Metropolitan Statistical Area. Two tracts are affected. Tract 1020.02 has a population of 1978 persons, 10% of this tract is included in the interference area for a total of 198 persons affected in this tract. Tract 1046.04 has a population of 4247