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LAW OFFICES  
BROWN FINN & NIETERT, CHARTERED  
SUITE 660  
1920 N STREET, N.W.  
WASHINGTON, D.C. 20036

JAN 28 1992

Federal Communications Commission  
Office of the Secretary

TEL (202) 887-0600  
FAX (202) 457-0126

ORIGINAL

January 28, 1992

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: **Wilburn Industries, Inc.**  
**Westerville, Ohio**

JAN 29 11 22 AM '92

Dear Ms. Searcy:

On behalf of our client, Wilburn Industries, Inc. applicant for a permit to construct and operate an FM broadcast station on Channel No. 280A at Westerville, Ohio (File No. BPH-911230MC), there are submitted herewith an original and two copies of an amendment to its application. The amendment, which is being filed as of right, amends the ownership information and technical proposal of the applicant.

Please direct any inquiry concerning this submission to the undersigned.

Very truly yours,



Eric S. Kravetz

ESK:Wilburn.fcc\ajs  
Enclosures

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JAN 28 1992

Federal Communications Commission  
Office of the Secretary

Re: **Channel No. 280A**  
**Westerville, Ohio**

Please amend the application of Wilburn Industries, Inc. for an FM station at Westerville, Ohio to include the attached materials.

Date:

January 28, 1992

Charles W. Wilburn  
President

JAN 28 11 22 AM '92

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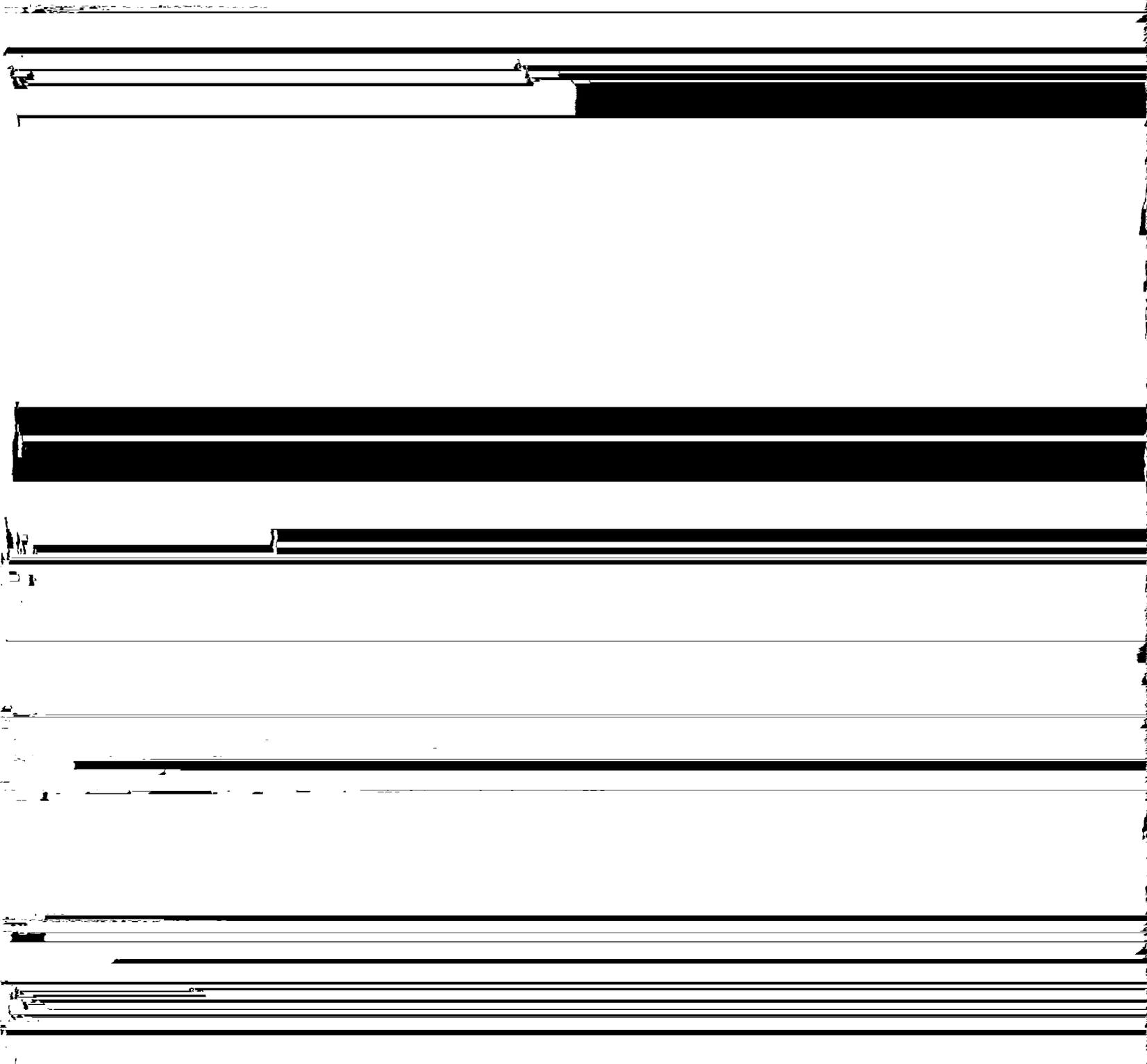
JAN 28 1992

Federal Communications Commission  
Office of the Secretary

**LEGAL AMENDMENT**

The attached amendment reflects the restructuring of the corporate applicant to provide for the issuance of voting and nonvoting stock, the decision by Bernard P.

XXXX



Please include the following amendments to Form 301, Application for construction permit for commercial broadcast station of Wilburn Industries, Inc., Application Reference No. 911230 MC:

Page 1, Question 1

Send notices and communications to Charles W. Wilburn only

Page 1, Question 3

No This application is not mutually exclusive with a renewal application

Page 2, Question 5

(a)  Yes Applicant certifies that no limited partner or non-voting shareholder will be involved in any material respect in the management or operation of the proposed station.

Page 3, Question 6

1.	Wilburn Industries, Inc. 210 South Court Street P.O. Box 418 Circleville, Ohio 43113	Charles W. Wilburn 3324 Westbury Drive Columbus, Ohio 43221	Bernard P. Wilburn 1063 Pennsylvania Avenue Columbus, Ohio 43201
2.	An Ohio Corporation	USA	USA
3.	N/A	President, Secretary Treasurer, Director	None
.	0	275 Voting	275 Non Voting

Page 7, Question 1

Please See Amended Integration Statement attached hereto as Amended Exhibit 4

Page 7, Question 2

Applicant will claim no qualitative credit for any of the enhancement factors included in this question.

Page 24, Section VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM  
Question 1

See Broadcast Equal Employment Opportunity Program Report  
(FCC 396A) attached

Page 25, Certification

Delete signature of Bernard P. Wilburn, Vice President &  
Secretary

AMENDED  
EXHIBIT 4

SECTION IV-B -- INTEGRATION STATEMENT

1. Principal, Charles W. Wilburn, who holds 375 voting shares of Applicant Wilburn Industries, Inc. (all of the corporations's voting shares) intends to participate in the management of the radio station on a full time basis at a minimum of 40 hours a week. Charles W. Wilburn will hold the position of general manager, and will conduct the station's day to day operations including overseeing all programming, public service and sales.

Charles W. Wilburn graduated from the Ohio State University Business School in 1957, and has been a licensed Certified Public Accountant in Ohio since 1960. He is a 1964 graduate of the Ohio State University Law School, and has practiced law in central Ohio from 1964 to the present with principal offices in Circleville, Ohio. His law practice is oriented to business matters.

Mr. Wilburn will move to Westerville, Ohio in the event the commission grants applicant the license.

Mr. Wilburn has been a resident of central Ohio for 30 years, and Upper Arlington, in northern Franklin County, Ohio for the past 14 years. He is a member of numerous professional, civic and fraternal organizations including Rotary International, BPOE, University Club of Columbus, the SBEBSSQSA and Masonic Lodge and Columbus Bar Association.

Mr. Nelson Embrey, former owner and operator of WNRE, Circleville, Ohio for 26 years will be employed as a consultant at the station if the license is granted by the commission.

**BROADCAST EQUAL EMPLOYMENT OPPORTUNITY  
MODEL PROGRAM REPORT**

1. APPLICANT

Name of Applicant Wilburn Industries, Inc.	Address 210 South Court Street P. O. Box 418 Circleville, Ohio 43113
Telephone Number (include area code) (614) 474-2780	

2. This form is being submitted in conjunction with:

Application for Construction Permit for New Station
  Application for Assignment of License

Application for Transfer of Control

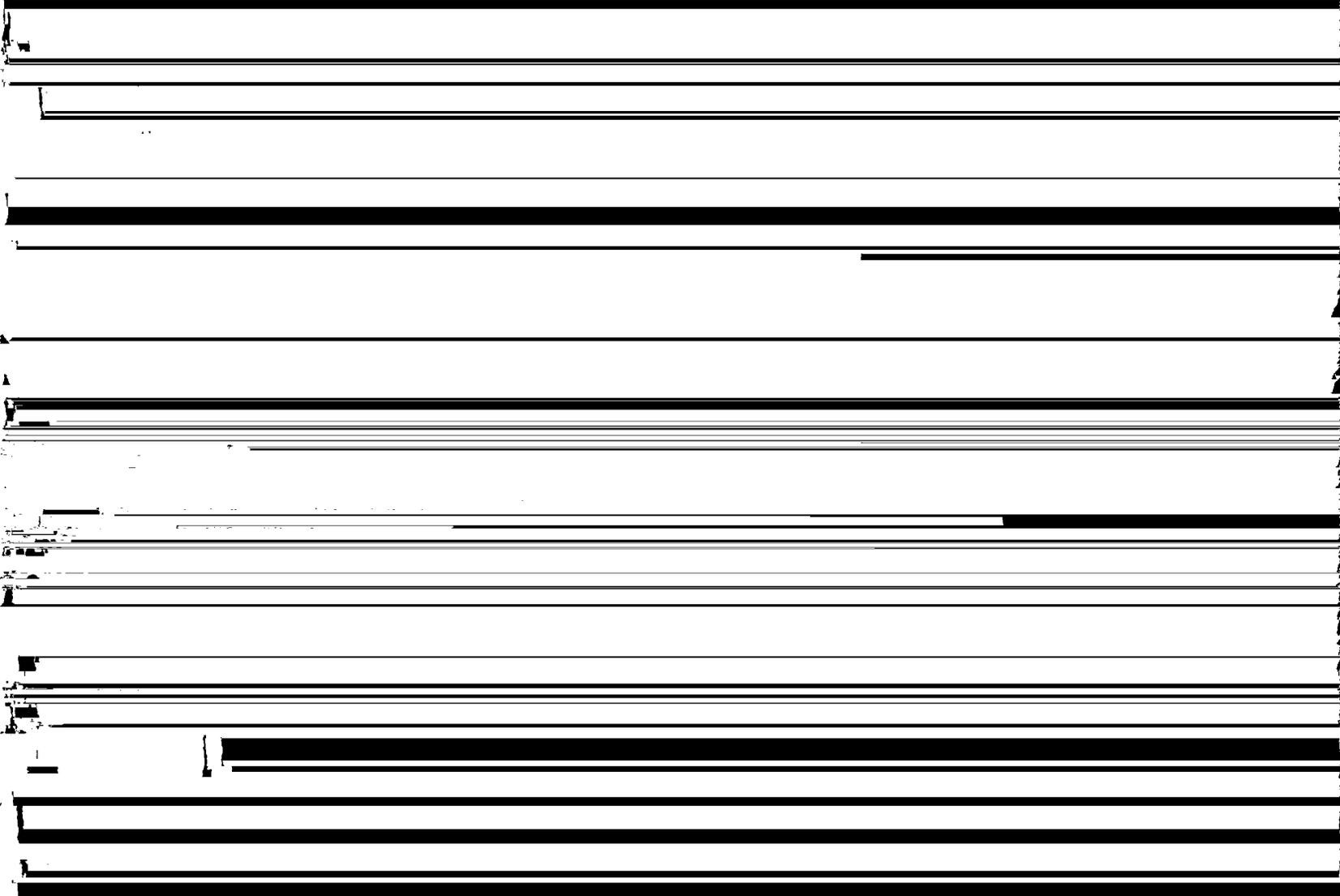
(a) Call letters (or channel number of frequency) ..... Channel 280A

(b) Community of License (city and state) ..... Westerville, Ohio

(c) Service:
  AM
  FM
  TV
  Other (Specify) \_\_\_\_\_

**INSTRUCTIONS**

Applicants seeking authority to construct a new commercial, noncommercial, or international broadcast station; applicants seeking



## GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

### I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

### II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

### III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

### IV. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified minority and female job applicants. Not all of the categories of recruitment sources need be utilized. The purpose of the listing is to assist the applicant in developing specialized referral sources to establish a pool of qualified minorities and women who can be contacted as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

### V. TRAINING

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist in its effort to increase the available pool of qualified minority and female applicants. Additionally, the applicant may set forth any other assistance it proposes to give to students, schools or colleges which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work study programs, and the like.

## MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

### I. GENERAL POLICY

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communication Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

### II. RESPONSIBILITY FOR IMPLEMENTATION

(Name/Title) Charles W. Wilburn, President & General Manager will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

### III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- Other (specify)

#### IV. RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration whenever job vacancies occur, we propose to utilize the following recruitment procedures:

- We will contact a variety of minority and women's organizations to encourage the referral of qualified minority and women applicants whenever job vacancies occur. Examples of organizations we intend to contact are:

NAACP, Columbus, Ohio Chapter  
 Columbus Urban League  
 National Organization for Women, Columbus Chapter  
 Buckeye Chapter American Women in Radio & Television, Inc.

- In addition to the organizations noted above, which specialize in minority and women candidates, we will deal only with employment services, including State employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services are:

Ohio Bureau of Employment Services  
 Ohio Department of Development  
 Ohio Department of Administrative Services

- When we recruit prospective employees from educational institutions such recruitment efforts will include area schools and colleges with minority and women enrollments. Educational institutions to be contacted for recruitment purposes are:

Ohio State University, Columbus, Ohio  
 Columbus State Community College, Columbus, Ohio  
 Capital University, Columbus, Ohio  
 Ohio Wesleyan University, Delaware, Ohio  
 Otterbien College, Westerville, Ohio  
 American School of Broadcasting  
 DeVry Institute & Technology, Columbus, Ohio

- When we place employment advertisements with media some of such advertisements will be placed in media which have significant circulation or viewership or are of particular interest to minorities and women. Examples of media to be utilized are:

Call and Post  
 Columbus Dispatch  
 Columbus Alive  
 Business First

- We will encourage employees to refer qualified minority and women candidates for existing and future job openings.

V. TRAINING

- Station resources and/or needs will be such that we will be unable or do not choose to institute programs for upgrading the skills of employees.
- We will provide <sup>informal</sup> /on-the-job training to upgrade the skills of employees.
- We will provide assistance to students, schools, or colleges in programs designed to enable qualified minorities and women to compete in the broadcast employment market on an equitable basis:

School or Other Beneficiary	Proposed Form of Assistance

Other (specify)

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

**Paperwork Reduction Act.** Public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Federal Communications Commission, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0120), Washington, D.C. 20503.

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 application 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 requested 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.

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.

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JAN 28 1992

Federal Communications Commission  
Office of the Secretary

**ENGINEERING AMENDMENT**

The attached engineering materials correct certain information in response to Item 7, concerning the height of the existing tower and antenna which were used by Station WBBY-FM and which will be used by the applicant. A new tower sketch, reflecting such heights in meters, also is included. This information merely reflects data which already is in the Commission's files and upon which the Commission therefore could rely in determining the technical nature of the applicant's proposal.

The amendment also proposes to operate with a higher ERP than as initially proposed, so that Items 9 and 19 are being revised and a new map depicting the station's coverage is supplied. (Due to the increase in power, the average heights of the radials were recomputed when the predicted distances to the 3.16 mV/m and 1.0 mV/m contours were determined.) Finally, in response to Items 13 and 20, the amendment includes an updated spacing study to reflect that the proposal to use the pre-existing facilities of WBBY-FM satisfies all current spacing standards, and an updated environmental assessment showing that the pre-existing facilities will not create an RF radiation hazard.

Except for the proposal to increase ERP, which is permitted until the comparative proposal of the applicant has been frozen, all of this information previously has been available to the Commission in its files in view of the applicant's proposal to utilize an existing tower and antenna.

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

4. Does the application propose to correct previous site coordinates?  
If Yes, list old coordinates.

Yes  No

Latitude	°	'	"	Longitude	°	'	"
----------	---	---	---	-----------	---	---	---

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 the relative field.

Exhibit No.

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.315(a) and (b)?

Yes  No

If No, attach as an Exhibit a request for waiver and justification therefor, including amounts and percentages of population and area that will not receive 316 mV/m service.

Exhibit No.

12. Will the main studio be within the protected 316 mV/m field strength contour of this proposal?

Yes  No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1126.

Exhibit No.

13. (a) Does the proposed facility satisfy the requirements of 47 C.F.R. Section 73.207?

Yes  No

(b) If the answer to (a) is No, does 47 C.F.R. Section 73.218 apply?

Yes  No

(c) If the answer to (b) is Yes, attach as an Exhibit a justification, including a summary of previous waivers.

Exhibit No.  
E3

(d) If the answer to (a) is No and 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.

(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.

- (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 the 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 exhibit(s).

14. 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(a) and 73.318.)

Exhibit No.

15. 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 V. The map must further 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.

16. Attach as an Exhibit *(insert the serial)* 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.  
E6

Complete map submitted with original application.

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

(b) the 816 mV/m and 1 mV/m predicted contours; and

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

SECTION V-8 - FM BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 8 to 16 km (meters)	Predicted Distances	
		To the 0.16 mV/m contour (kilometers)	To the 1 mV/m contour (kilometers)
212 *	146.8	16.0	27.8
0	99.4	13.1	23.1
45	71.6	11.1	19.8
90	77.1	11.5	20.5
135	85.6	12.1	21.6
180	115.8	14.2	24.9
225	147.2	16.0	27.8
270	137.8	15.5	27.0
315	133.5	15.2	26.6

\*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

20. 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.  

If No, explain briefly why not.

See Exhibit E7

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.

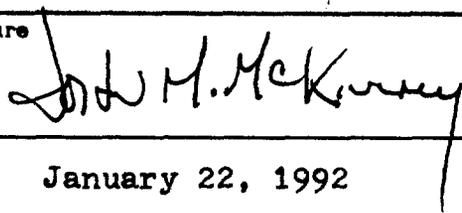
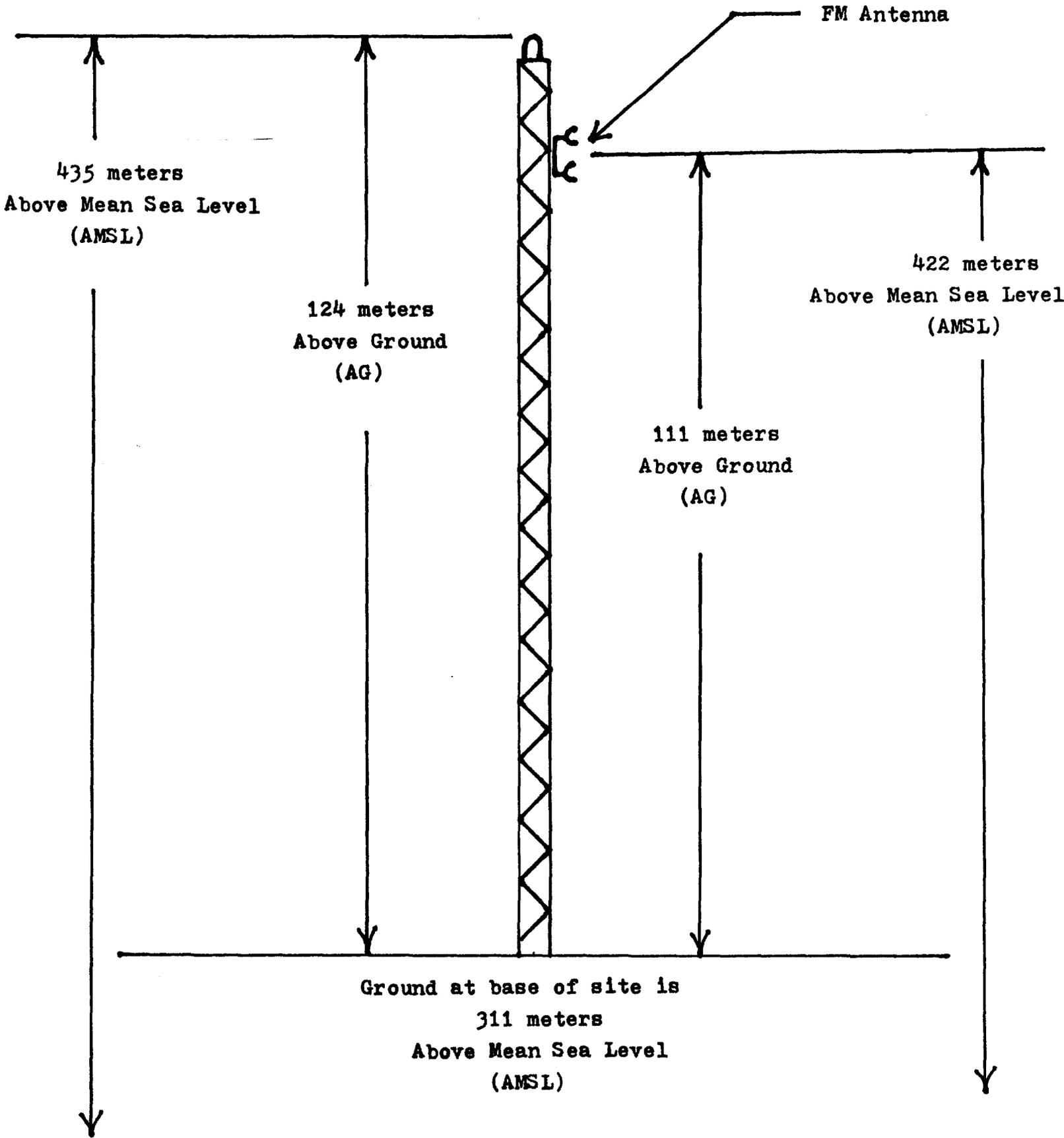
Name (Typed or Printed) <b>John M. McKinley</b>	Relationship to Applicant (e.g., Consulting Engineer) <b>Consultant</b>
Signature 	Address (Include ZIP Code) <b>510 Whitley Drive Gahanna, Ohio 43230</b>
Date <b>January 22, 1992</b>	Telephone No. (Include Area Code) <b>(614) 475-1747</b>

EXHIBIT E1 - ANTENNA SKETCH



## EXHIBIT E3 - SEPARATION REQUIREMENTS

Included with this exhibit is a spacing study from Dataworld. This spacing study reflects the latest spacings corresponding to the requirements for new class A facilities, which are now 6.0 kilowatts, Effective Radiated Power (ERP).

Since WBBY was licensed originally as a 3.0 kilowatt ERP Class A Facility, the separation requirement at that time between a Class A and a Class B station on adjacent channels was 105 kilometers (65 miles). The spacing study supplied by Dataworld shows the current spacing between WITF in Tiffin, Ohio and WBBY to be 106.2 kilometers, short-spaced by 6.84 kilometers for a 6.0 kw. ERP Class A but not short-spaced for a "grandfathered" 3.0 kw. ERP Class A such as WBBY is.

Another interesting note to this spacing study is that WPAY on channel 281C (at a bearing of 184.8 degrees from WBBY) is shown to be clear of any spacing problems by a distance of 3.47 km. However, when WBBY was originally licensed, the spacing requirement for adjacent channel Class A (3.0 kw. ERP) to Class C stations was 169 kilometers (105 miles), instead of the current requirement of 165 kilometers. There was probably a "short-spacing" of about 0.5 kilometers at that time. Since WPAY-FM lies in a southerly direction, this is probably why the original owners could not situate the tower any closer to Westerville to provide 100% city grade coverage over the present incorporated boundaries of Westerville (see Exhibit E2).

Therefore, WBBY does fit the spacing requirements under 47 C.F.R. Section 73.213(c)(1).

OHIO BROADCAST CONSULTANTS, INC.  
GAHANNA, OHIO

Page 1  
January 20, 1992

FM Spacing study

Title: WBBY  
Channel 280A (103.9 MHz)

Latitude: 40-14-04  
Longitude: 82-50-20

FM Spacing study

Title: WBBY  
Channel 280A (103.9 MHz)

Latitude: 40-14-04  
Longitude: 82-50-20

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License		St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WQAL	CP	WIN COMMUNICATIONS INCOR	281B	11	41-22-45	36.1	158.3	113
CLEVELAND		OH BPH-9108261B	104.1	323	81-43-12	216.9	45.35	CLEAR
CP Granted 09/17/91 per FCC release #21214 dated 09/26/91								

WPAY-FM LIC	RADIO STATION	WPAY/WPFB	281C	100	38-43-20	184.8	168.5	165
PORTSMOUTH		OH BLH-890612KC	104.1	305	83-00-05	4.7	3.470	CLOSE
Network: MBS; License Granted 04/20/90 per FCC release #20842 dated 04/26/90; Affiliated with WPAY(AM)								

ALLOC			282A		40-25-36	298.8	44.62	31
RICHWOOD		OH DOC-90-121	104.3		83-18-00	118.5	13.62	CLOSE
Granted effective 12/13/91, adopted 10/16/91, released 10/29/91; Filing window 12/16-01/15/92 **CLOSED** ; DOC-90-121								

WQKT	LIC	WWST CORPORATION	283B	52	40-47-31	51.6	100.5	69
WOOSTER		OH	104.5	101	81-54-17	232.2	31.50	CLEAR
Network: AP SMN; Affiliated with WKVX(AM)								

>> End of channel 280A study <<

FM Spacing study

Title: WBBY  
Channel 280A (103.9 MHz)  
Database: FCC 11/26/91

Latitude: 40-14-04  
Longitude: 82-50-20  
Safety zone: 74 km

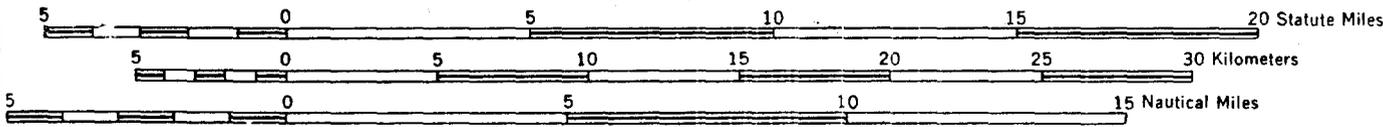
Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of	License	St FCC File no.	Freq	EAK-m	Longitude	-from	(km)	(km)
PRM Forest	ADD	Pearl Broadcasting, Inc. OH DOC-90-318	226A 93.1		40-48-30 83-38-40	313.4 132.9	93.39 83.39	10 CLEAR
PRM Reynoldsburg	ADD	Pearl Broadcasting, Inc. OH	227B 93.3		39-53-32 83-02-44	204.9 24.7	41.89 26.89	15 CLEAR
WKKJ Chillicothe DA: oddball	APC	Pearl Broadcasting, Inc. OH BPH-900226IB	227B 93.3	50DA 150	39-35-30 83-06-38	198.0 17.9	75.05 60.05	15 CLEAR
WDEQ-FM LIC De Graff		Riverside Local Board of OH BLED-840202AB	*277D 103.3	.01 1	40-18-48 83-55-06	275.8 95.1	92.23	
ALLOC Lancaster Filing window		OH DOC-86-338 04/20-05/18/87 **CLOSED**	278A 103.5		39-45-48 82-35-05	157.5 337.6	56.63 25.63	31 CLEAR
WSWZ Lancaster	LIC	Skyway Broadcasting Comp OH BLH-901015KD	278A 103.5	5.40 100	39-43-58 82-35-43	159.5 339.7	59.46 28.46	31 CLEAR
WTTF-FM LIC Tiffin		WTTF, Inc. OH BLH-850715KW	279B 103.7	50 131	41-08-20 83-14-45	341.3 161.0	106.2 -6.84	113 SHORT
ALLOC Tiffin		OH	279B 103.7		41-08-20 83-14-45	341.3 161.0	106.2 -6.84	113 SHORT
WBBY Westerville DOC-82-282	LIC	Mid-Ohio Communications, OH BLX-6667	280A 103.9	2 110	40-14-04 82-50-20	.0 .0		115 SHORT
WBBY Westerville	CP	Mid-Ohio Communications, OH BPH-850711JM	280A 103.9	2.55 109	40-14-04 82-50-20	.0 .0		115 SHORT
ALLOC Westerville		OH	280A 103.9		40-14-04 82-50-20	.0 .0		115 SHORT
WBBY Westerville DA: oddball	APC	Mid-Ohio Communications, OH BMPH-891108ID	280A 103.9	6DA 99	40-14-04 82-50-20	.0 .0		115 SHORT
WYMJ-FM LIC Beavercreek		Dayton Radio, Inc. OH BLX-841029CB	280A 103.9	1.15 159	39-44-12 84-09-25	244.2 63.3	125.4 10.42	115 CLOSE
ALLOC Beavercreek		OH	280A 103.9		39-44-12 84-09-25	244.2 63.3	125.4 10.42	115 CLOSE

OHIO BROADCAST CONSULTANTS, INC.  
GAHANNA, OHIO

Page 4  
January 20, 1992

FM Spacing studu

Scale 1:250,000



CONTOUR INTERVAL 100 FEET  
DOTTED LINES REPRESENT 50-FOOT CONTOURS

**OHIO BROADCAST CONSULTANTS, INC.**  
**EXHIBIT E6 - PREDICTED CONTOURS**

Complete map submitted with orig. applic.

315°

0°

1.0 MV./M. CONTOUR

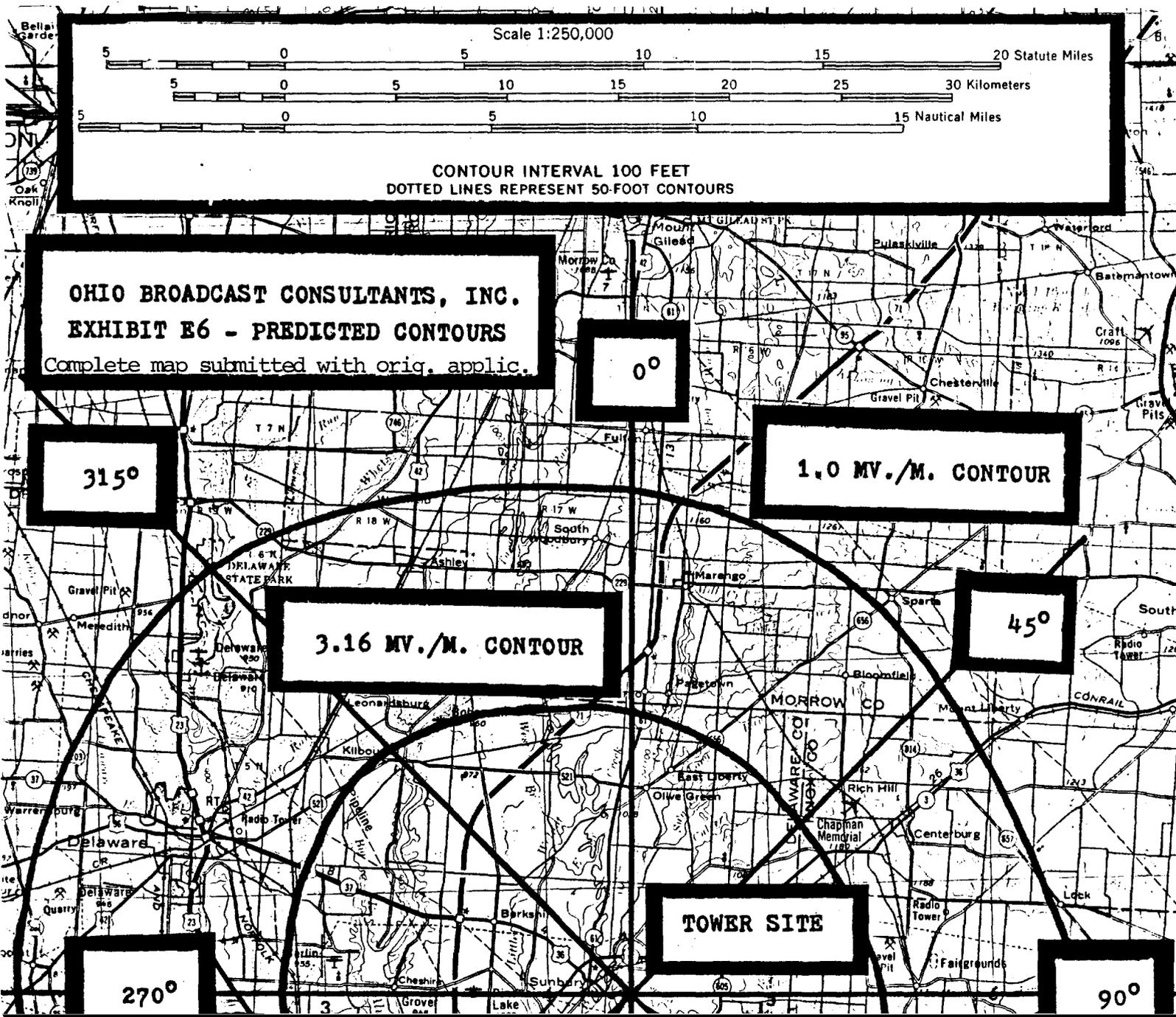
3.16 MV./M. CONTOUR

45°

TOWER SITE

270°

90°



## EXHIBIT E7 - ENVIRONMENTAL IMPACT

This application meets the requirements of 47 C.F.R. Section 1.1307 in that an environmental assessment (EA) does not need to be filed for the following reasons:

- (1) This application does not involve a site that would be located in any of the areas designated in 47 C.F.R. Section 1.1307 (a)(1)-(7).
- (2) This application does not involve a tower that would be equipped with high intensity white lights as defined in 47 C.F.R. Section 1.1307(a)(8).
- (3) This application does not involve a transmitting facility that would expose workers or the general public to levels of radiofrequency radiation in excess of the "Radio Frequency Protection Guides" recommended in "American National Standard Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 Khz. to 100 Ghz.", (ANSI C95.1-1982).

The applicant has reviewed the OST Bulletin No. 65 and has found that workers would be exposed to excessive levels of radiofrequency radiation if any worker would come within 15 meters of the center of radiation of the FM antenna. Since the FM antenna is to be mounted at a level of 111 meters above ground, workers would be exposed to excessive levels of RF energy if they were to climb above the 96 meter level with power applied to the antenna.

Therefore, a sign will be placed at the base of the tower which will read as follows:

"ANYONE WHO CLIMBS ABOVE THE 96 METER LEVEL ON THIS TOWER  
WILL BE EXPOSED TO DANGEROUS LEVELS OF RADIOFREQUENCY ENERGY"

If the applicant needs to have work performed on the tower which involves a worker climbing above the 96 meter level, then all power being supplied to the antenna will be extinguished while this work is being done and workers are within 15 meters of the center of radiation of the FM antenna.

The transmitter building and tower will also be completely surrounded by a six foot high chain link fence with a barbed wire top and a locked gate.

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