

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

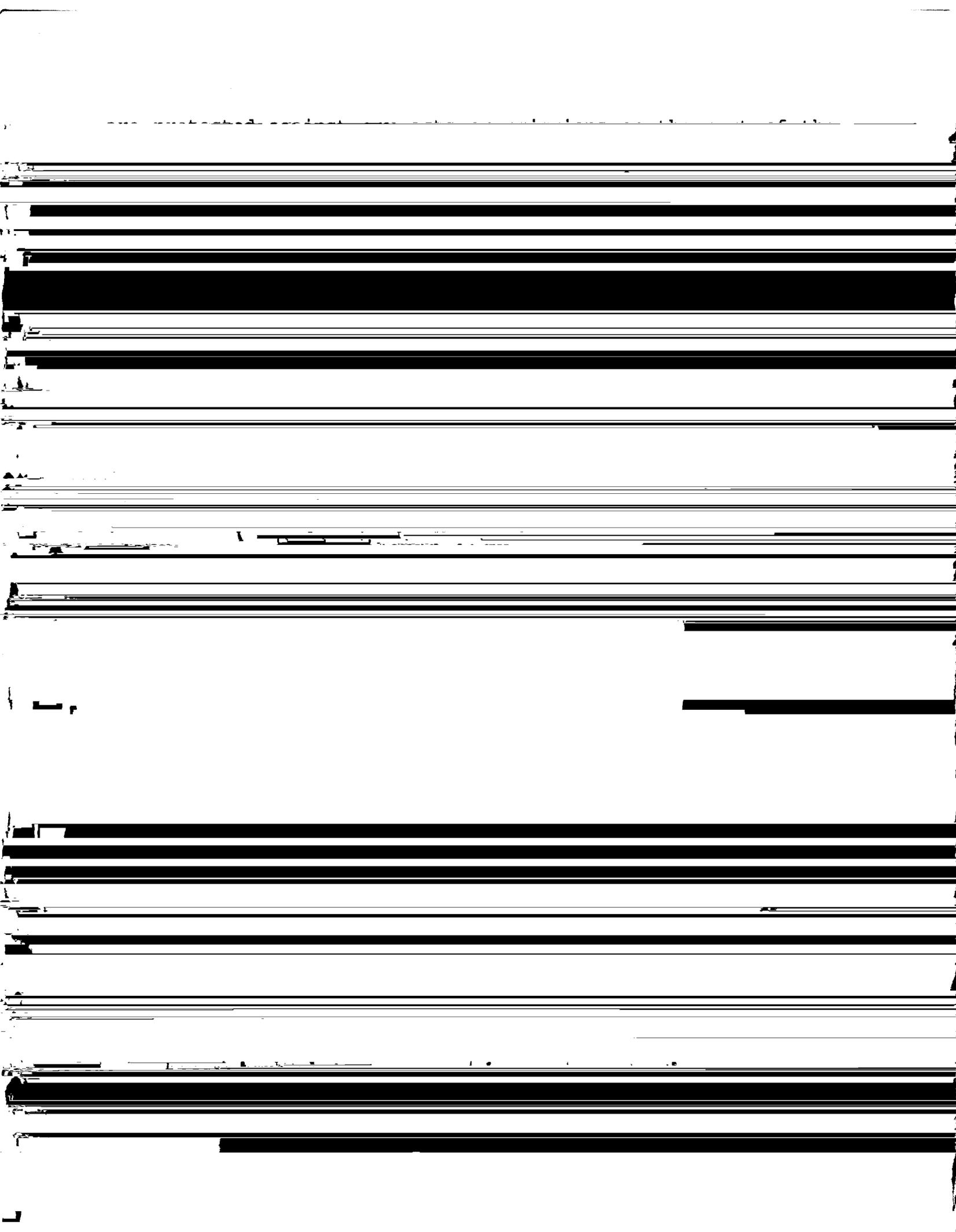
In re Applications of)	MM Docket <u>93-94</u>
)	
Scripps Howard)	File No. BRCT-910603KX
Broadcasting Company)	
)	
For Renewal of License of)	
Station WMAR-TV,)	
Baltimore, Maryland)	
)	
and)	
)	
Four Jacks)	File No. BPCT-910903KE
Broadcasting Inc)	

be suitable for its intended use. See Cuban-American Limited, 2 F.C.C. Rcd 3264 (Rev. Bd. 1987), rev. denied in part, granted in part 5 F.C.C. Rcd 7321. An applicant must meet both requirements in regard to its site or its application must be denied. Id. Four Jacks, in spite of the fact that its principals own its proposed site, does not have reasonable assurance that its site is available and did not have such assurance at the time it filed its application.

2. In its Opposition, Four Jacks does not contest that it would have to move the WPOC(FM) antenna on its proposed tower before it can implement its proposal.¹ Four Jacks also does not contest that no one ever contacted the licensee of WPOC(FM), Nationwide Communications, Inc., ("Nationwide") about whether it would be willing to move the WPOC(FM) antenna to accommodate Four Jacks' proposal. Finally, Four Jacks does not dispute that the lease with Nationwide does not require Nationwide to move at the request of the tower's owner.

3. It is a well settled principal of property law, now codified under Maryland law, that a lessee in compliance with the terms of its lease has the right to the possession of the leased premises to the exclusion of the landlord. See Md. Code Ann., Real Prop. § 2-115 & § 1-101(k) (1974); Kessler v. Equity Management, Inc., 572 A.2d 1144 (Md. Ct. Spec. App. 1990). The lessee's rights

¹ Four Jacks' proposes to use a tower that is owned by its principals through another company, Cunningham Communications, Inc. See Four Jacks' Opposition to Petition to Deny, filed February 12, 1992, at 4 n.2.



that the WPOC(FM) antenna would have to be moved before the tower could be used. Any claims by Four Jacks that it had reasonable assurance rested on the use of the existing tower and cannot be repaired by the Bureau's speculative assertion that Four Jacks could simply build a new tower.

The Site is Not Zoned for Its Intended Use

6. Four Jacks claims that Scripps Howard has made a frivolous and reckless claim that its proposed tower site is unavailable because it is not zoned for its intended use. The attached correspondence between Stephen J. Nolan and W. Carl Richards, Baltimore County Zoning Coordinator, makes clear that Scripps Howard was and is justified in its statement that the site is not zoned for its intended use.

7. In his letter to Mr. Richards, Mr. Nolan discussed the history of zoning cases related to Four Jacks proposed site. Mr. Nolan states:

The tower's presence is based upon three known cases that a diligent search has disclosed, namely: Case No. 69-269RX; Case No. 75-181X; and Case No. 77-122SPH. Case No. 77-122SPH allowed an extension to 1009 feet, but this 15 year old special exception has never been utilized, and accordingly has lapsed under Section 502.3 of the Regulations.

Letter from Stephen J. Nolan to W. Carl Richards, dated January 28, 1992, attached as Exhibit A. Although Mr. Nolan does state in his letter that the present height of the tower is 666 feet, he does not state that the tower has never been built to a height greater than 666 feet. Exhibit A. Instead, Mr. Nolan only states that the tower has never been built to the once authorized height of 1009

feet. Id. Therefore, Mr. Nolan did not make any false statements to Mr. Richards, as Four Jacks alleges.

8. Not only is Four Jacks wrong when it claims that Mr. Nolan made misrepresentations to Mr. Richards, it is wrong in dismissing the finding in Mr. Richards' letter. It is reasonable to infer from Mr. Richards' letter that an unused zoning authorization lapses.³ Therefore, his conclusion that the zoning authority for the tower has lapsed is correct and an appropriate issue should be added.

The Tower Is Not Adequate For Its Contemplated Use

9. Four Jacks attempts to refute Scripps Howard's contention that the tower is inadequate for its contemplated use by stating that the study that found the tower inadequate rested on a false assumption.⁴ Four Jacks states that the study by Matthew Vlissides, P.E., submitted with Scripps Howard's Motion to Enlarge, rests on the assumption that Four Jacks would place the Channel 2 antenna on top of the existing 666 foot tower. Four Jacks claims that it would actually reduce the tower to a height of 602 feet before mounting the antenna on top of the tower.

³ See Letter of W. Carl Richards, Jr., Zoning Coordinator, Baltimore County Government, Office of Zoning Administration and Development Management, Office of Planning and Zoning, to Stephen J. Nolan, dated February 14, 1992, attached as Exhibit F to Scripps Howard's Motion to Enlarge.

⁴ Significantly, Four Jacks did not offer any expert study of its own demonstrating its designated tower is structurally suitable for its proposed use. Instead, Four Jacks simply tried to attack the reasonable assumptions relied on by Mr. Vlissides in his expert report.

10. In the attached engineering study, Mr. Vlissides revised his original analysis, substituting Four Jacks' claimed tower construction proposal for the assumption in his earlier report. See Report of Matthew J. Vlissides, P.E., June, 1993, attached as Exhibit B. Even under Four Jacks' claimed proposal, portions of the tower structure are still significantly overstressed. Exhibit B at 11-13. The Final Conclusion of Mr. Vlissides' second report reads:

It is my engineering opinion, that, due to the large overstresses calculated in the tower legs, the subject tower is not adequately designed to support the Channel 2 antenna and its transmission lines as described in the Organization of Analysis Section of this Report. Therefore, I strongly recommend that the subject tower must not be used for the installation of the Channel 2 Antenna.

Exhibit B at 13 (emphasis in the original). Mr. Vlissides report, which relies on Four Jacks own statement of how it would implement its proposal, demonstrates that the tower is simply unsuitable for its contemplated use. An appropriate issue should, therefore, be added.⁵

Four Jacks Misrepresented the Height of Its Tower

11. Four Jacks defends both its misrepresentation in its application of the height of its proposed tower and the failure of its principals to ever report the 40 foot reduction of the tower

⁵ In its Opposition, Four Jacks makes the remarkable argument that the fact that its principals own the tower has some bearing on whether the tower is structurally suitable for its proposed use. Obviously, the ownership of a site is irrelevant to whether the site is suitable for its proposed use.

which Four Jacks asserts is an essential part of any misrepresentation issue. Although Scripps Howard agrees that an intent to deceive is a necessary part of any misrepresentation issue, the plain fact of misrepresentation, coupled with proof that the party making it had knowledge of its falsity, is enough by itself to justify a conclusion that an intent to deceive was present. Leflore Broadcasting Co., Inc. v. FCC, 636 F.2d 454, 462 (D.C. Cir. 1980). In addition, Four Jacks would have had an incentive to misrepresent the tower height, because such a misrepresentation would help conceal their failure to comply with Commission and FAA requirements requiring the reporting of the change in tower height. See 14 C.F.R. § 771.13(c)(1) (1992); 47 C.F.R. § 73.1690(b)(1) (1992).

14. Four Jacks' principals misrepresented the height of the tower at their designated site in their application. Four Jacks' principals knew, as the tower owners, that the height was misrepresented. Therefore, under Leflore Broadcasting, the intent to deceive can be assumed and appropriate issues should be added.

Four Jacks Did Not Take the Necessary
Steps to Determine Whether it was Financially Qualified
Before So Certifying In its Application

15. Although Four Jacks claims that Scripps Howard's request for a financial issue is "spurious," Four Jacks does not state that its principals made any attempt to ascertain what it would cost to obtain a new site or build a new tower when Four Jacks certified that it was financially qualified, even though its principals knew or should have known that the proposed the tower

was both unavailable and unsuitable. Four Jacks dismissively claims that alternative--but unspecified--alternatives to a new tower or a new site would be available. Four Jacks does not state that any of these supposed alternatives are or whether they were considered, just that they would be available.

16. The Commission requires an applicant to engage in serious and reasonable efforts to determine how much it would cost to construct and operate its proposed facility for three months before certifying that it is financially qualified. Northampton Media Associates, 4 F.C.C. Rcd 5517, 5519 (1989), recon. denied 5 F.C.C. Rcd 3075; aff'd, 941 F.2d 1214 (D.C. Cir. 1991); Pepper Schultz, 5 F.C.C. Rcd 3273 (1990), aff'd, reh'g denied, 927 F.2d 1258 (D.C. Cir. 1991), cert. denied, 112 S. Ct. 453 (1991). Four Jacks has failed to demonstrate that its principals made any effort to determine what the cost would be to replace a tower they knew or should have known was unavailable or unsuitable. Appropriate issues should, therefore, be added.⁶

⁶ Four Jacks states that it has the money to construct a new tower or obtain a new site, if necessary. Whether Four Jacks has now has the needed funds is irrelevant to a determination of whether it engaged in serious and reasonable efforts to determine the cost of construction before certifying.

WHEREFORE, Scripps Howard Broadcasting Company respectfully requests that the issues specified in its Motion to Enlarge Issues Related to Tower Site be added against Four Jacks Broadcasting, Inc.

Respectfully submitted,

Scripps Howard
Broadcasting Company

By: 
Kenneth C. Howard, Jr.
Leonard C. Greenebaum
David N. Roberts

Its Attorneys

BAKER & HOSTETLER
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036
(202) 861-1500

Dated: June 8, 1993

EXHIBIT A

NEWTON A. WILLIAMS
THOMAS J. RENNER
WILLIAM P. ENGLEHART, JR.
STEPHEN J. NOLAN *
ROBERT L. HANLEY, JR.
ROBERT S. GLUSHAKOW
STEPHEN M. SCHENNING
DOUGLAS L. BURGESS
ROBERT E. CAMILL, JR.
LOUIS G. CLOSE, E.
E. BRUCE JONES * *
GREGORY J. JONES
J. JOSEPH CURRAN, E.

*ALSO ADMITTED IN D.C.
**ALSO ADMITTED IN NEW JERSEY

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RALPH E. DEITZ
1945-1981
OF COUNSEL
T. BAYARD WILLIAMS, JR.
RICHARD L. SCHAEFFER
WRITER'S DIRECT DIAL
823- 7853

January 28, 1992

Arnold Jablon, Esquire
Director
Office of Zoning Administration
and Development Management
County Office Building
Towson, Maryland 21204

Mr. John Reisinger
Chief Building Engineer for
Baltimore County Department
of Permits and Licenses
County Office Building
Towson, Maryland 21204

Re: Request for Advisory Opinion Letter and Investigations

Gentlemen:

We serve as special counsel to Scripps Howard Broadcasting Company, the licensee of television station WMAR-TV in Baltimore, Maryland. In that connection, it has come to our attention that recently, Four Jacks Broadcasting, Inc. ("Four Jacks") has petitioned the Federal Communications Commission for a construction permit for Channel 2 in Baltimore. If the authorization were to be approved by the Commission, Four Jacks would use and operate a 666 foot, guyed tower that is located in the northwest quadrant of Route 40 West and North Rolling Road, known as 1200 North Rolling Road, Catonsville, Maryland. The tower's presence is based upon three known cases that a diligent search has disclosed, namely: Case No. 69-269RX; Case No. 75-181X; and Case No. 77-122SPH. Case No. 77-122SPH allowed an extension to 1009 feet, but this 15 year old special exception has never been utilized, and accordingly has lapsed under Section 502.3 of the Regulations. Nonetheless, a review of Four Jacks' application before the Federal Communications Commission indicates that they might need to increase the height of the tower.

It is our opinion that any increase in height over the present 666 feet would require: 1) A full County Review Group (CRG) meeting under the new rules and method; 2) A special hearing/special exception under all the tower rules in the Zoning Regulations and Development Regulations; and 3) Compliance with all state and federal requirements including FCC, FAA and all applicable environmental regulations.

Arnold Jablon, Esquire
Mr. John Reisinger
January 28, 1992
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In addition to our review of tower height and zoning issues, a consultant was retained to evaluate the safety and structural integrity of the existing tower. A copy of the consultant's report by Vlissides Enterprises, dated January, 1992, is enclosed for your information. You will note that the consultant has concluded that "the tower legs are overstressed on the lower and upper 200 feet of the tower by as much as

Baltimore County Government
Office of Zoning Administration
and Development Management
Office of Planning & Zoning



111 West Chesapeake Avenue
Towson, MD 21204

(410) 887-3353

February 14, 1992

Stephen J. Nolan, Esquire
Nolan, Plumbhoff & Williams
Suite 700
Court Towers
210 W. Pennsylvania Avenue
Towson, MD 21204-5340

RE: Request for Advisory Opinion
1170/1200 North Rolling Road
600-800 ft. N of Powers Lane
1st Election District
Zoning: D.R.-3.5
Zoning Cases: 69-269-RX, 75-181-X,
77-122-SPH

Dear Mr. Nolan:

Reference is made to your letter of January 18, 1992 to Arnold Jablon, Director of Zoning Administration and Development Management, which has been referred to me for reply. You have requested an investigation on behalf of your client, Scripps Howard Broadcasting Company, regarding an existing tower at the above referenced location including confirmation of zoning requirements, State and Federal requirements for the existing structure and an anticipated addition to the height.

It is my understanding that you have also sent correspondence to the Building Engineer of Baltimore County regarding this matter. Assuming that he will address the structural, Federal and State requirements which are beyond the scope of review of this office, I will defer to him regarding the same.



Stephen J. Nolan, Esquire
February 14, 1992
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As to your zoning inquiries, please be advised this office confirms three zoning cases on the subject site:

1. 69-269-RX -- Reclass public unzoned land to R.-6 and a Special Exception for a radio and T.V. wireless transmitting and receiving structure (5.6 acres) for Commercial Radio Institute, Inc. Granted 6/12/69 by Zoning Commissioner Rose - 660 foot tower height indicated on plan with an ultimate height of 850 feet shown.
2. 75-181-X -- Special Exception for a 75 foot self-supporting receiving tower on 0.001 acre (25 feet x 25 feet) for Commercial Radio Institute, Inc.; Lessee - Nationwide Communications, Inc. (WFOC-FM). Granted by Zoning Commissioner DiNenna on 2/27/75.
3. 77-122-SPH -- Special Hearing to approve an amendment to the special exception granted in case 69-269-RX to extend the approval height of the tower by 159 feet, from 850 to 1009 feet high (5.6 acres) for Commercial Radio Institution, Inc. Granted on 1/20/77 by Zoning Commissioner DiNenna.

Additionally, you have stated the existing tower was only built to a height of 666 feet and that it is anticipated that an addition might soon be requested to extend the height. This office would confirm and agree with your conclusion that the additional height granted in 1977 has in fact lapsed under Section 502.3 (B.C.Z.R.) provided that the following "reasonable diligence" standard two prong test established by the courts would fail:

1. The commencement of some readily identifiable work and
2. The work begun with the intention then formed to continue said work to its completion.

Obviously, if no work was commenced to extend the height, which appears to be the case, the second prong of the test would not have been met. Further, should the Building Engineer or State or Federal agency confirm the safety hazards of the existing 666 foot tower, this office would not approve any additional height without the benefit of another zoning hearing even though the original plan allowed 850 feet.

Stephen J. Nolan, Esquire
February 14, 1992
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Although the Development Control section of this office may agree that the full development process, including a community input meeting and hearing officer hearing would be appropriate upon considering an additional height and possible safety hazards, it is suggested that you contact Donald Rascoe in the Development Management section for information regarding any development and/or waiver procedures as reviewed by all agencies.

If I can be of any further assistance at this time or if you are updated with any additional information and need additional zoning clarification, please do not hesitate to contact me in this office at 887-3391.

Very truly yours,



W. Carl Richards, Jr.
Zoning Coordinator

MCR:scj

cc: John Reisinger, Building Engineer
Permits and Licenses
Lawrence Schmidt, Zoning Commissioner
William Huxley, Area Planner, Office of Planning & Zoning
Donald T. Rascoe, Z.A.D.M.

Certificate of Service

I, Diane Wright, a secretary in the law offices of Baker & Hostetler, hereby certify that I have caused copies of the foregoing "Consolidated Reply to Oppositions to Motion to Enlarge Issues Related to Tower Site" to be sent First Class United States Mail this 8th day of June, 1993 to the following:

The Honorable
Richard L. Sippel*
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.
Room 214
Washington, DC 20554

Martin R. Leader, Esq.
Fisher Wayland Cooper & Leader
1255 23rd Street, N.W.
Suite 800
Washington, DC 20037
Counsel to Four Jacks
Broadcasting, Inc.

Norman Goldstein*
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2025 M Street, NW
Room 7212
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Robert Zauner*
Hearing Branch-Mass Media Bureau
Federal Communications Commission
2025 M Street, NW
Room 7212
Washington, DC 20554



Diane Wright

* By Hand

EXHIBIT B

VLISSIDES ENTERPRISES, INC.

ENGINEERING STATEMENT

SCRIPPS HOWARD BROADCASTING COMPANY

This engineering statement has been prepared on behalf of Scripps Howard Broadcasting Company ("Scripps"), licensee of WMAR-TV, Channel 2, Baltimore, Maryland in support of its petition to deny the application filed by Four Jacks Broadcasting, Inc. ("FJB"), FCC File No. BPCT-910903KE. The FJB application seeks a construction permit for a new television station to serve Baltimore, Maryland on Channel 2 + (54-60MHz) with an effected radiated power (ERP) of 100 kW (H&V) and 267 meters antenna height above average terrain. FJB proposes operation from an existing tower currently utilized by WPOC (FM) located at the geographic coordinates:

North Latitude: 39° 17' 13"

West Longitude: 76° 45' 16"

Based on the attached Engineering Study's final conclusion the FJB application should be rejected since the tower, if used as proposed, is unsafe.



Matthew J. Vlissides, P.E.
6/4/93
Matthew J. Vlissides, P.E.
State of Maryland
Professional Engineer
Registration No. 7868

VLISSIDES ENTERPRISES, INC.

County of Fairfax
State of Virginia

Matthew J. Vlissides, being duly sworn upon his oath,
deposes and states that:

He is a graduate Civil/Structural Engineer, a Registered Professional Engineer in the District of Columbia, State of Maryland, State of Virginia and forty four other States, and is the Owner of Vlissides Enterprises, Inc. specializing in tall tower design and construction, with offices at 7601 Burford Drive, McLean, VA 22102;

That his qualifications are a matter of record in the Communications Industry and in the Federal Communications Commission;

That the attached engineering reports were prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true



Matthew J. Vlissides, P.E.
Matthew J. Vlissides, P.E.
District of Columbia
Professional Engineer
Registration No. 5949

Subscribed and sworn to before me this 3rd day

of June, 1993

My Commission Expires 4/30/94

[Signature]
Notary Public

MATTHEW J. VLISSIDES, P.E.
ENGINEERING CONSULTANT

Mr. Matthew J. Vlissides, an Engineering Consultant, has over 30 years of experience in structural and mechanical engineering and is a specialist in antenna and tower design, fabrication supervision and installation.

During the past twenty years he has performed extensive successful consulting work in the area of communications for L.T.V. Electrosystems, Inc., Comsat Corporation, Northrop-Page Communications Engineers, Inc., NASA Goddard Space Flight Center, ITT-SPC, COSMOS Engineers, Inc., Stainless, Inc., Bechtel Corporation, MCI, Microflect Company, Inc., R.F. Systems, Inc., Telcom, Inc., DCA, Coast Guard, Plessey, Ltd., Burlison Associates, Inc., E-Systems, Inc., RCA, Fairchild Space & Electronics, Inc., David L. Steel, Sr., P.E., Harris International, RCA Global, RMS, Sanders Associates, T-CAS, TELCOM, Teleconsult, Intelsat, numerous Broadcasting Stations throughout the USA, and others..

Prior to establishing his Engineering Business, Mr. Vlissides was chief structural engineer for Northrop-PAGE where he was responsible for the analysis, design, specification writing and fabrication supervision of advanced structures, such as self-supporting and guyed communication towers, antennas, tracking stations, radio telescopes and structures for the space communications program. He was instrumental in the development of the 42' antenna transportable commercial station operated by Comsat, and in the design of the wheel and track antenna and the integrated two-story building with antenna on top, utilized by LTV Aircraft Company.

Mr. Vlissides has participated in the successful engineering and implementation of several multimillion dollar projects, including the structural design and implementation of earth stations in Panama, Iran, Lebanon, Brazil, and the Comsat stations at Brewster, Andover and Paumalu. He was responsible for the structural/mechanical design of earth stations in Australia, Thailand and the Philippines, as well as West Coast tracking stations for the U.S. Navy.

In the intricate area of shock and vibration isolation and electronics equipment packaging in shelters, Mr. Vlissides has solved difficult problems for Page Communications Engineers at OGDEN Laboratories involving the MRC-113 U.S. Air Force Program.

Mr. Vlissides participated in the analysis, design and implementation of large microwave and troposcatter communications programs, including the multimillion dollar IWCS in

Vietnam, the Iranian Microwave (INTS), the NATO Bypass, and the Hongkong-Taiwan-Philippines tropo system. The major areas of involvement covered feasibility studies, advance survey details, civil-mechanical and electrical designs, and final implementation.

Mr. Vlissides was heavily involved in the design and construction of the VOA antenna and tower systems in VOA Kavala, Greece; Rhodes, Greece; and Liberia, Africa.

He has extensive experience in the design of structures using non-conventional materials as plastics, non-metallic filaments, glass filaments, etc.

In the area of multi-leveled guyed towers, Mr. Vlissides expanded a computer program able to handle guyed towers of up to 20 guy levels, and carrying concentrated loads and a top electronic umbrella with up to 36' long radials. The tower is treated as a beam-column on elastic supports with all secondary effects taken into consideration. Recently, Mr. Vlissides has developed a computerized design of a family of self-supporting and guyed microwave towers, covering a range

Professional Engineer - Virginia - #05782
Professional Engineer - Pennsylvania - #20621.E
Professional Engineer - Illinois - #62-32261
Professional Engineer - New Jersey - #12618
Professional Engineer - Kentucky - #11506
Professional Engineer - Alabama - #15408
Professional Engineer - Arizona - #19057
Professional Engineer - Arkansas - #6273
Professional Engineer - Colorado - #23862
Professional Engineer - Connecticut - #14015
Professional Engineer - Delaware - #6957
Professional Engineer - Florida - #0036341
Professional Engineer - Georgia - #15453
Professional Engineer - Idaho - #5272
Professional Engineer - Indiana - #ENE8600628
Professional Engineer - Iowa - #10765 (Retired)
Professional Engineer - Kansas - #10337
Professional Engineer - Massachusetts - #32444
Professional Engineer - Michigan - #31880
Professional Engineer - Minnesota - #17485
Professional Engineer - Mississippi - #9591
Professional Engineer - Missouri - #E-21442
Professional Engineer - Nebraska - #E-6055
Professional Engineer - Nevada - #7162
Professional Engineer - New Hampshire - #6347
Professional Engineer - Wyoming - #5096
Professional Engineer - Ohio - #E-49967
Professional Engineer - Oregon - #13,133
Professional Engineer - Rhode Island - #4832
Professional Engineer - South Carolina - #10437
Professional Engineer - Utah - #7425
Professional Engineer - Vermont - #5193
Professional Engineer - Wisconsin - #E-24060
Professional Engineer - New Mexico - #9598
Professional Engineer - Louisiana - #22119
Professional Engineer - North Carolina - #12902
Professional Engineer - South Dakota - #4222
Professional Engineer - Montana - #ENG08785
Professional Engineer - North Dakota - #PE-3023
Professional Engineer - Washington - #23117
Professional Engineer - Oklahoma - #14540
Professional Engineer - West Virginia - #9901
Professional Engineer - Tennessee - #17,990
Professional Engineer - California - #C 040249
Professional Engineer - Texas - #59573

Certificate of Qualification by the National Engineering
Examiners, No. 4003.

Tau Beta Pi Honorary Engineering Society
Certified Fallout Analyst and Protective Construction
Analyst, DOD - 2TT0318865

Electronics Industries, Association, TR-34.2 Subcommittee
on Earth Station Antennas. TR 14.7 Tower Committee on
Communication Towers

Mr. Vlissides' major recent studies and prototype designs include:

Large Tracking Antenna Tower & Foundation Analysis & Design Consideration (July 1968)

Large Tracking Antenna Building & Foundation Earthquake Analysis & Design Considerations (July 1968)

Application of Fiberglass/Plastic to transportable communications systems.

High-gain Antennas Surface Geometry Determination (January 1968)

Optimum Antenna Design for Synchronous Communications Satellites (January 1970)

Original Design of 32-foot Transportable or Fixed Tracking Antennas (April 1971)

Participation in the preparation of Earth Station Antenna Standards for the Electronics Industries Association (EIA) (1969-1971)

Effective low cost methods for equipment shock and vibration isolation (June 1971)

Design of an experimental multibeam antenna system of satellite communications (1971-1972) Comsat Corporation

Analysis, Design & Fabrication Supervision of the ~~functionalized~~ ~~horn~~ ~~C~~ ~~transmitting~~ ~~antenna~~ ~~for~~ ~~Comsat~~