

92-2911

ORIGINAL

ROBERT JOHN BARLOW
RICHARD T. BOWSER*
RICHARD M. CAMPANELLI
A. WRAY FITCH III
JAMES A. GAMMON†*
GEORGE R. GRANGE II*
LAUREN B. HOMER†*
PHILIP W. LEBER†
NANCY OLIVER LESOURD*
PETER F. RATHBUN*
H. ROBERT SHOWERS*
MICHAEL J. WOODRUFF*
*ADMITTED TO A BAR OTHER THAN VA
† OF COUNSEL

GAMMON & GRANGE, P.C.

LAW OFFICES
SEVENTH FLOOR
8280 GREENSBORO DRIVE
MCLEAN, VA 22102-3807
(703) 761-5000
FACSIMILE: (703) 761-5023

WASHINGTON, DC OFFICE
SUITE 300
1925 K STREET, N.W.
WASHINGTON, DC 20006-1115
(202) 862-2000

File

RECEIVED

JUN 29 1992

Federal Communications Commission
Office of the Secretary

June 29, 1992

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

--BY HAND--

Re: Amendment Toddjonn, Inc.
Channel 224A, Harrisburg, North Carolina
File No. 920327MI

Dear Ms. Searcy:

Attached is an Amendment to the above referenced application. The Amendment is filed as a matter of right within thirty (30) days of tender of the Toddjonn Application. See Report No. 15274 released May 28, 1992.¹ The Amendment substitutes, inter alia, Todd P. Robinson as an individual applicant for Toddjonn, Inc.

Please direct any questions to the undersigned.

Respectfully submitted,

TODD P. ROBINSON

By A. Wray Fitch III
A. Wray Fitch III
His Counsel

RECEIVED
JUL 1 3 26 PM '92
FM EXAMINERS

Enclosure

cc: Todd P. Robinson (For Public File)

[klw/a.sear(a)]

¹ June 28th is a Sunday. Therefore, this amendment is timely filed on Monday, June 29.

RECEIVED

JUN 29 1992

Federal Communications Commission
Office of the Secretary

AMENDMENT

The Application of Toddjonn, Inc. is amended to substitute Todd P. Robinson as an individual applicant in lieu of Toddjonn, Inc.

The information below should be substituted in lieu of Exhibit 3. Mr. Robinson will work full time, no less than 40 hours per week, as the Station's general manager in the event his application for Harrisburg, North Carolina is granted. As general manager, he will be responsible for the overall operation and management of the Station. He will make all policy related decisions. He will terminate his current employment in order effectuate his integration proposal.

Mr. Robinson will claim credit for current and past local service area residence in Charlotte, North Carolina. He has resided at 3317 Windsor Drive, Charlotte, North Carolina 28209 since February 1990 and at 4624 Colony Road, Charlotte, North Carolina 28210 from October 1988 to February 1990. Mr. Robinson will also claim credit for involvement in the following civic organizations either located in the proposed service area of the station or providing benefits to the service area:

1988 to Present	Active YMCA member, participated for the last two years as a Captain of the YMCA Program Support Campaign. (2 hrs./week approximately)
1991	Kids Repay, participated with ten others in tutoring and mentoring high risk young kids at the local Johnston Memorial YMCA. (2 hrs./week approximately)

- 1990 to present Helped to organize and plan an Annual Southeastern Businessman's Conference for 400 plus businesses and professional leaders in the Southeast. The focus of the conference is on priorities, spiritual and family values, and personal effectiveness within the marketplace. (15-20 hrs. annually approximately)
- 1988 - 1990 Volunteered as part of employment at Arthur Anderson & Co. to prepare tax returns for fifteen plus charities in Charlotte and Mecklenburg County. (30 hrs. total approximately)
- 1991 - 1992 Member through current employer of the Charlotte Chamber of Commerce, participates on trips and events designed to attract businesses to Charlotte and promote the city's business climate. (20 hrs. annually approximately)
- 1991 - Present Member and participant of Interstate Group, an organization that works with the York County Economic Development Board and Rock Hill Chamber of Commerce to promote and encourage business in the York County, South Carolina area along Interstate 77. (3 hrs. monthly approximately)
- 1989 - Present Member of the Mecklenburg Sigma Chi Alumni Association, involved in fund raising to benefit area charities. (5 hrs. quarterly approximately)
- 1989 - Present Member UNC Young Alumni, helps raise money for educational scholarships, some of those scholarships awarded to service area residents. (10 hrs. annually approximately)
- 1991 - Present Member Young Affiliates of the Mint Museum, helps support by involvement in fund raising activities and benefits. (4-5 hrs. monthly approximately)
- 1991 - Present Member Republican Issues Forum Organization which meets monthly to discuss local area issues. (1.5 hrs. monthly approximately)
- 1991 - Present Member Mecklenburg Young Republicans (Chairman 1991 Membership Committee). (1 Hr. per month approximately)

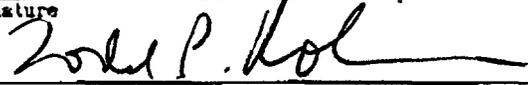
Attends Myers Park Presbyterian Church.

Mr. Robinson will also claim credit for broadcast experience he acquired by participating in the design and production of an interview show as well as several live camera interviews for a large training center in Chicago in January 1989.

The date of incorporation of Toddjonn, Inc. as stated in response to question 3 of the application is corrected to July 19, 1978 in Raleigh, North Carolina.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

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 Todd P. Robinson	Signature 
Date June 26, 1992	Title

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 Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's rules. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 72 hours to 302 hours 45 minutes with an average of 192 hours 31 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, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0027), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-572, 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. 3607.

ENGINEERING REPORT

IN SUPPORT OF

**AN AMENDMENT TO AN APPLICATION
FOR A CONSTRUCTION PERMIT**

**CHANNEL 224A
HARRISBURG, NORTH CAROLINA**

TODD ROBINSON

RUBIN, BEDNAREK & ASSOCIATES, INC.
Consulting Telecommunications Engineers
WASHINGTON, DC

RUBIN, BEDNAREK & ASSOCIATES, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS
1350 CONNECTICUT AVENUE, NW - SUITE 610
WASHINGTON, DC 20036

New - Harrisburg, North Carolina

ENGINEERING STATEMENT (AMENDED)

I ABSTRACT

This engineering report supports an amendment to the application of TODD ROBINSON requesting a construction permit authorizing the installation of a frequency modulated broadcasting station to serve Harrisburg, North Carolina.

This application proposes the employment of an omni-directional FM antenna with an effective radiated power of 6.0 kilowatts and a height of 100 meters above average terrain. The purpose of this amendment is to correct the misplacement of the proposed antenna tower.

This engineering report complies in all respects with all pertinent sections of the FCC rules. All paragraphs answered fully on the attached Section V-B FCC Form 301 will not be repeated in the body of this engineering report. For the purpose of completeness, a full FCC Form 301 is being submitted herewith.

II RESPONSE TO FCC FORM 301

Paragraph 8:

Exhibit I is an amended vertical plan sketch of the proposed antenna system.

III ALLOCATION CONSIDERATIONS

Paragraph 13:

The use of channel 224A at the proposed location would be fully consistent with all of the required separation criteria contained in Section §73.207 of the rules with respect to all existing and authorized stations or unused channel assignments. Attached as Exhibit II is a tabulation of an allocation study which demonstrates that the operation of channel 224A at the proposed site would not create any short spacing(s).

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 610

WASHINGTON, DC 20036

New - Harrisburg, North Carolina

IV FURTHER RESPONSE TO FCC FORM 301

Paragraph 14:

The distance to the proposed 115 dBu contour, as calculated in accordance with Section §73.318 of the rules, is 0.97 kilometers. There are no known commercial, government receiving stations, cable head-end facilities, or densely populated areas within 0.97 kilometers of the proposed site. There are, however, a limited number of residences within the "blanket contour". In the unlikely event objectionable interference is experienced, the applicant will, in accordance with Section §73.318 of the rules, apply all remedies necessary to satisfactorily resolve any complaints.

There are several FM and television broadcast transmitter sites, shown in Exhibits III(a) and III(b), which are located within 10 kilometers of the proposed site. Applicant accepts full responsibility, as required in FCC Form 301, for the elimination of any objectionable interference in the event such interference is experienced.

Paragraph 15:

Exhibit IV is a 1:1 scale copy of the original 7.5' U.S.G.S survey map and is furnished herewith to satisfy the requirements of this paragraph. The required latitude and longitude information as well as a scale of distance in kilometers is clearly shown.

Paragraphs 16:

The radials and predicted contours required by this paragraph are shown as Exhibit V and were predicted in accordance with Section §73.313 of the rules using a computer program that accesses a data base containing the pertinent FCC curves.

Paragraph 17:

The land area within the 1.0 mV/m contour was determined using a computer program which calculates the distances to the contour in 1 degree increments for 360° and integrates these measurements into the calculation of total area.

The population total within the 1.0 mV/m contour was computed using software that makes use of the official 1990 U.S. Bureau of Census data (post 7/15/91).

RUBIN, BEDNAREK & ASSOCIATES, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS
1350 CONNECTICUT AVENUE, NW - SUITE 810
WASHINGTON, DC 20036

New - Harrisburg, North Carolina

IV FURTHER RESPONSE TO FCC FORM 301 (CONT.)

Paragraph 17 - cont.:

This data is available in a data base as census "blocks" which are the smallest census entity having an average population per block of less than 50 persons. Associated with each census block is a set of reference coordinates as determined by the Census Bureau which is referred to as the "centroid". Where the "centroid" of a census block lies within the predicted 1 mV/m contour, the entire census block is included in the population total. Conversely, where the "centroid" is outside the contour, the entire census block is not included in the population total. Over large contours such as those predicted for this application, the cumulative error of this method of population counting approaches zero.

Paragraph 20:

The proposed construction will have no significant impact on the quality of the human environment and any FCC action with regard to this application would be categorically exempt from environmental processing under Section §1.1306 of the rules. The proposed transmitter site does not fall into any of the categories specified in Section §1.1307(a) of the rules and the use of high intensity obstruction lighting is not contemplated.

The proposed radio facility will comply with the radio frequency protection guidelines contained in the ANSI C95.1-1982 standard (American National Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz) with respect to all areas accessible to workers or the general public.

Calculations performed using the procedures found in OST Bulletin #65 ANSI guidelines were conducted to determine the height on the tower at which the ANSI maximum allowable radiation level of 1mW/cm² would be exceeded. These calculations show the maximum permissible radio frequency radiation produced by the proposed antenna occurs at a point 65.8 meters above the base of the tower. Calculations were also conducted to determine the level of radiation that would actually reach the ground in vicinity of the tower base. For the proposed antenna, the radiation level at ground level and for 2 meters above the ground would be 0.054 mW/cm² and 0.057 mW/cm², respectively. These radiation values are below the ANSI maximum standard of 1 mW/cm². All radio frequency calculations are shown in Exhibit VI.

RUBIN, BEDNAREK & ASSOCIATES, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS
1350 CONNECTICUT AVENUE, NW - SUITE 610
WASHINGTON, DC 20036

New - Harrisburg, North Carolina

V STATEMENT WITH RESPECT TO EMERGENCY POWER

This application proposes the installation and maintenance of auxiliary power at the transmitter and studio location. The instant proposed equipment will be of sufficient capacity to power the transmitter and studio in the event of a power failure at one or both locations.

VI METHODS EMPLOYED

All data and computations contained herein or upon which this engineering report is based are in complete accord with the pertinent requirements of the FCC rules unless otherwise specifically so stated.

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

Name of Applicant

Todd Robinson

Call letters (if issued)	Is this application being filed in response to a window? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, specify closing date: _____
--------------------------	--

Purpose of Application: (check appropriate boxes)

- | | |
|--|---|
| <input 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 checked="" 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 checked="" type="checkbox"/> Antenna location | <input type="checkbox"/> Class |
| <input type="checkbox"/> Main Studio location | <input type="checkbox"/> Other (Summarize briefly) |

File Number(s) BPH - 920327MI

1. Allocation:

Channel No.	Principal community to be served:			Class (check only one box below)
224	City	County	State	<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
	Harrisburg	Mecklenburg	NC	

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. Approximately 0.42 kilometers north east of the intersection of U.S. Route 29 and State Route 49, Mecklenburg County, North Carolina.
- (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	35°	17'	32"	Longitude	80°	45'	10"
----------	-----	-----	-----	-----------	-----	-----	-----

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.

N/A

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	35	°	17	'	30	"	Longitude	80	°	45	'	19	"
----------	----	---	----	---	----	---	-----------	----	---	----	---	----	---

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.

Date July 13, 1992 Office where filed Southern Region

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>Delta (Pvt.)</u>	<u>8.0</u>	<u>N 158 E</u>
(b) _____	_____	_____

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

- (1) of site above mean sea level; 221 meters
- (2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 93 meters
- (3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] 314 meters

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

- (1) above ground 89 meters (H)
- 89 meters (V)
- (2) above mean sea level [(aX1) + (bX1)] 310 meters (H)
- 310 meters (V)
- (3) above average terrain 100 meters (H)
- 100 meters (V)

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). 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. I

9. Effective Radiated Power:

(a) ERP in the horizontal plane 6.0 kw (H) 6.0 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

 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 the relative field.

Exhibit No.
N/A

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 816 mV/m service.

Exhibit No.
N/A

12. Will the main studio be within the protected 816 mV/m field strength contour of this proposal?

Yes No

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

Exhibit No.
N/A

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 73.213 apply? N/A

Yes No

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

Exhibit No.
N/A

(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.
N/A

(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 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.
III

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.
IV

16. 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.
V

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

(b) the 0.16 mV/m and 1 mV/m predicted contours; and

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

17. Specify area in square kilometers (1 sq. mi. = 259 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 2,515 sq. km. Population 650,317

18. 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.

19. Terrain and coverage data *(to be calculated in accordance with 47 C.F.R. Section 73.313)*

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

Linearly interpolated 90-second database 7.5 minute topographic map

(Source: NGDC)

Other *(briefly summarize)*

SECTION V-B - 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 316 mV/m contour (kilometers)	To the 1 mV/m contour (kilometers)
68	133.2	18.9	32.2
0	101.9	16.3	28.5
45	123.7	18.2	31.1
90	124.1	18.2	31.2
135	104.6	16.6	28.9
180	91.9	15.4	27.2
225	90.9	15.3	27.0
270	86.2	14.8	26.4
315	79.1	14.2	25.3

*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.)

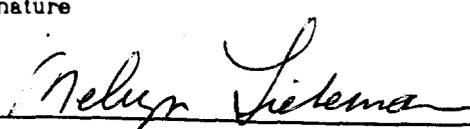
Would a Commission grant of this application come within Section 11307 of the FCC Rules, such that it may have a significant environmental impact? Yes No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 11311. Exhibit No. VI

If No, explain briefly why not. See Engineering Exhibit

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) Melvyn Lieberman	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer
Signature 	Address (include ZIP Code) Rubin, Bednarek & Associates, Inc. 1350 Connecticut Avenue, NW - Suite 610 Washington, D.C. 20036
Date July 14, 1992	Telephone No. (include Area Code) (202) 296-9380

PROPOSED ANTENNA

OVERALL HEIGHT : 314m (1030') AMSL

RADIATION CENTER: 310m (1017') AMSL

93m (305') AGL

89m (292') AGL

SITE ELEVATION : 221m (725') AMSL

NOTE :
NOT DRAWN TO SCALE

EXHIBIT I (AMENDED)

VERTICAL PLAN SKETCH OF ANTENNA
AND SUPPORTING STRUCTURE
HARRISBURG, NORTH CAROLINA

TODD ROBINSON
JULY 1992

RUBIN, BEDNAREK & ASSOCIATES, INC.
TELECOMMUNICATIONS CONSULTING ENGINEERS
WASHINGTON, DC

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 610

WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT II - Page 1 (amended)

FM ALLOCATION STUDY

Channel 224A

N 35° 17' 32"

W 80° 45' 10"

Call City of	Auth Licensee name	Chan ERP-kw	Latitude	Br-to	Dist.	Req.
License	St FCC File no.	Freq EAH-m	Longitude	-from	(km)	(km)
ALLOC Morganton	NC	221A 92.1	35-45-09 81-43-19	300.5 120.0	101.7 70.66	31 CLEAR
Coordinates updated from LIC record		BLH890515KA				
ALLOC Asheboro	NC	222C 92.3	35-49-59 79-50-02	53.8 234.4	102.7 7.669	95 CLOSE
Coordinates updated from LIC record		BLH851227KB				
WKRR LIC Asheboro	Dick B/Cng Co., Inc of No NC BLH-851227KB	222C 100DA 92.3 393	35-49-59 79-50-02	53.8 234.4	102.7 7.669	95 CLOSE
DA: oddball ODD851227KB @ 0 deg						
SC-FM LIC Greenville	B/Casting Company of the SC BLH-800811AB	223C 100 92.5	35-08-16 82-36-31	264.7 83.6	169.8 4.840	165 CLOSE
ALLOC Greenville	SC	223C 92.5	35-08-16 82-36-31	264.7 83.6	169.8 4.840	165 CLOSE
Coordinates updated from LIC record		BLH800811AB				
WHLZ LIC Manning	Clarendon County B/Ting SC BLH-860312KD	223C 100 92.5	33-32-05 79-59-15	160.0 340.5	207.3 42.26	165 CLEAR
ALLOC Manning	SC	223C 92.5	33-32-05 79-59-15	160.0 340.5	207.3 42.26	165 CLEAR
Coordinates updated from LIC record		BLH860312KD				
NEW Harrisburg	APC Toddjon, Inc. NC 920327MI	224A 6 92.7 100	35-17-30 80-45-19	254.9 74.9	.234 -115	115 SHORT
Untimely Filed						
NEW Harrisburg	APC Victory Christian Center NC 920326MA	224A 6 92.7 100	35-17-22 80-45-36	244.8 64.8	.725 -114	115 SHORT
NEW Harrisburg	APC Saturday Communications NC 920327ML	224A 6 92.7 100	35-16-20 80-45-54	206.5 26.5	2.481 -113	115 SHORT
Untimely Filed						

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 610

WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT II - Page 2 (amended)

FM ALLOCATION STUDY

Channel 224A

N 35° 17' 32"

W 80° 45' 10"

Call City of License	Auth License	Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
NEW Harrisburg	APC	James E. Martin, Jr. NC 920326MB	224A 92.7	5.30 106	35-16-20 80-45-54	206.5 26.5	2.481 -113	115 SHORT
ALLOC Harrisburg		NC DOC-89-594	224A 92.7		35-20-28 80-41-30	45.6 225.6	7.766 -107	115 SHORT
Filing window 02/25-03/26/92 **CLOSED** ; Site Restricted-Effective 2-24-1992								
NEW Dillon	APC	Clayton Broadcasting Cor SC BPH-881101MI	225C 92.9	100 549	34-21-53 79-19-49	128.1 308.9	165.9 .894	165 CLOSE
Cut-off 08/28/89; Mx with Renewal of WZNS								
WZNS Dillon	LIC	Resort Broadcasters of D SC BLH-860811KB	225C 92.9	100 549	34-21-53 79-19-49	128.1 308.9	165.9 .894	165 CLOSE
ALLOC Dillon		SC	225C 92.9		34-21-53 79-19-49	128.1 308.9	165.9 .894	165 CLOSE
ALLOC Winston-Salem		NC	226C 93.1		36-16-33 79-56-27	33.6 214.0	131.5 36.53	95 CLEAR
WMQX-FM Winston-Salem	LIC	Ebe Communications Limit NC BLH-880310KA	226C 93.1	100 335BT	36-16-33 79-56-27	33.6 214.0	131.5 36.53	95 CLEAR
ALLOC Forest City		NC	227C 93.3		35-16-19 82-14-00	269.5 88.6	134.7 39.71	95 CLEAR
WBBO-FM Forest City	LIC	Rutherford County Radio NC BLH-871214KB	227C 93.3	93 619BT	35-16-19 82-14-00	269.5 88.6	134.7 39.71	95 CLEAR
NEW Lenoir	APC	Gateway Media Limited Pa NC BPH-890616MN	277A 103.3	.86 185	35-58-24 81-33-22	316.4 136.0	104.9 94.91	10 CLEAR
DOC-90-430; Cut-off 05/04/90								
ALLOC Greenwood		SC DOC-89-404	278C 103.5		34-09-28 82-07-42	225.3 44.5	178.1 166.1	12 CLEAR
Site Restricted-Effective 1-10-91-RSVD For WMTYFM Per D89-404								

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 610

WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT III(a) page 1 (amended)

FM Stations Within 10 Kilometers of Proposed Site

N 35° 17' 32"

W 80° 45' 10"

Call City of license	Auth licensee name St	Licensee name FCC file no.	Channel freq	H-kW H-m	V-kW V-m	Latitude Longitude	Br-to -from	Dist (km)
NEW Harrisburg Untimely Filed	APC Toddjon, Inc. NC	920327MI	224A 92.7	6.00 100	6.00 100	35-17-30 80-45-19	254.9 74.9	.2
NEW Harrisburg	APC Victory Christian Center NC	920326MA	224A 92.7	6.00 100	6.00 100	35-17-22 80-45-36	244.8 64.8	.7
NEW Harrisburg Untimely Filed	APC Saturday Communications NC	920327ML	224A 92.7	6.00 100	6.00 100	35-16-20 80-45-54	206.6 26.6	2.5
NEW Harrisburg	APC James E. Martin, Jr. NC	920326MB	224A 92.7	5.30 106	5.30 106	35-16-20 80-45-54	206.6 26.6	2.5
WSOC-FM LIC Charlotte	WSOC Radio, Inc. NC	BLH-860730KA	279C 103.7	100 320	100 320BT	35-15-41 80-43-38	145.9 325.9	4.1
ALLOC Charlotte Coordinates updated from LIC record	NC	BLH860730KA	279C 103.7			35-15-41 80-43-38	145.9 325.9	4.1
WFAE Charlotte DA: oddball	LIC The University of NC At NC	ODD900215IA @ 0 deg	*214C1 90.7	100 228	100DA 228	35-15-06 80-41-12	126.9 306.9	7.5
ALLOC Charlotte Coordinates updated from LIC record	NC	BLH5510	284C 104.7			35-15-06 80-41-12	126.9 306.9	7.5
WMXC Charlotte DA: oddball	CP EZ Communications, Inc. NC	BMPH-911127IE @ 0 deg	284C 104.7	100 369	100DA 369BT	35-15-06 80-41-12	126.9 306.9	7.5
WMXC Charlotte	LIC EZ Communications, Inc. NC	BLH-891025KA	284C 104.7	100 376	99.0DA 376	35-15-06 80-41-12	126.9 306.9	7.5

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 810

WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT III(a) page 2 (amended)

FM Stations Within 10 Kilometers of Proposed Site

N 35° 17' 32"

W 80° 45' 10"

Call City of license	Auth license	Licensee name St FCC file no.	Channel freq	H-kW H-m	V-kW V-m	Latitude Longitude	Br-to -from	Dist (km)
-------------------------	-----------------	----------------------------------	-----------------	-------------	-------------	-----------------------	----------------	--------------

NEW Charlotte	CP	MHS Holdings, L.P. NC	255A 98.9		.084DA 41	35-16-37 80-50-02	257.0 77.0	7.6
------------------	----	--------------------------	--------------	--	--------------	----------------------	---------------	-----

Experimental Operation-Vertical Polarization Only;

This application has 5 sites. This is the center site (C);

DA: oddball ODD891218MK @ 0 deg

ALLOC Harrisburg		NC DOC-89-594	224A 92.7			35-20-28 80-41-30	45.5 225.6	7.8
---------------------	--	---------------	--------------	--	--	----------------------	---------------	-----

Filing window 02/25-03/26/92 **CLOSED** ; Site Restricted-Effective 2-24-1992

NEW Charlotte	CP	MHS Holdings, L.P. NC	255A 98.9		.084DA 5	35-21-46 80-43-14	20.4 200.4	8.4
------------------	----	--------------------------	--------------	--	-------------	----------------------	---------------	-----

Experimental Operation-Vertical Polarization Only;

This application has 5 sites. This is the East site (E);

DA: oddball ODD891218MK-2 @ 45 deg

RUBIN, BEDNAREK & ASSOCIATES, INC.

CONSULTING TELECOMMUNICATIONS ENGINEERS

1350 CONNECTICUT AVENUE, NW - SUITE 810

WASHINGTON, DC 20038

New - Harrisburg, North Carolina

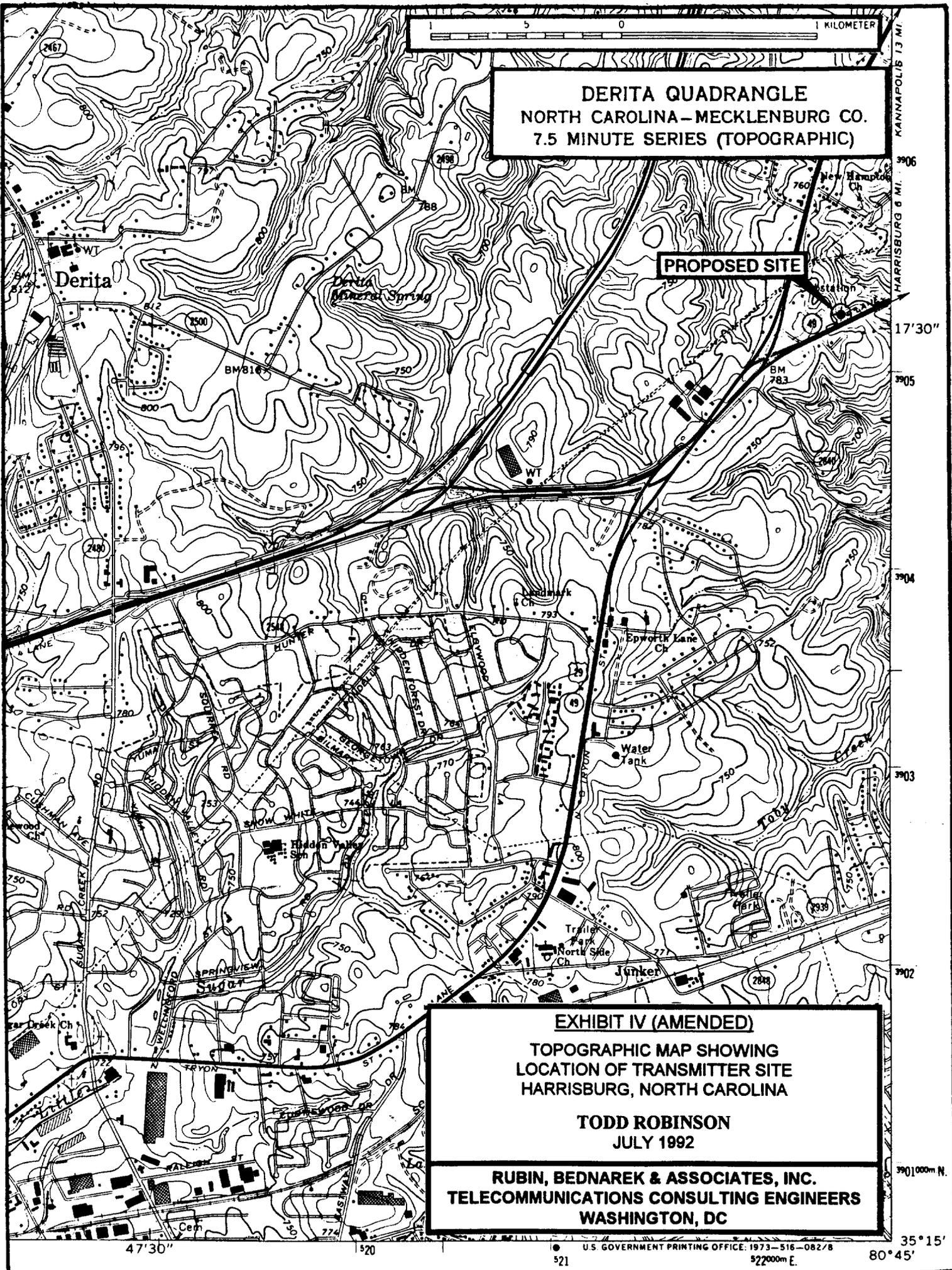
EXHIBIT III(b) (amended)

TV Stations Within 10 Kilometers of Proposed Site

N 35° 17' 32"

W 80° 45' 10"

Call City of license	Auth St	Licensee name FCC file number	Chan. Zone	ERP (kW)	HAMSL-m HAAT-m	Latitude Longitude	Br-to -from	Dist (km)
WCCB CHARLOTTE	LIC NC	WCCB-TV, INC.	18 o II	2090	581 366	35-15-56 80-44-06	151.4 331.4	3.4
Horizontal polarization								
WSOC-TV CHARLOTTE	LIC NC	WSOC TELEVISION, INC.	9 + II	316	576 359	35-15-41 80-43-38	145.9 325.9	4.1
Horizontal polarization								
WTVI CHARLOTTE	CP NC	CHARLOTTE MECKLENBURG	*42 + II	2750	590 390	35-17-14 80-41-45	96.1 276.2	5.2
Horizontal polarization								
WY KANNAPOLIS	CP NC	COMMUNITY ACTION COMMU	64 - II	2570	612 DA 412	35-15-05 80-41-15	127.4 307.5	7.5
Horizontal polarization; DA: Harris ODD890413KE @ 0 deg								
WUNG-TV CONCORD	LIC NC	UNIVERSITY OF NORTH CA	*58 o II	1230	595 DA 393	35-15-06 80-41-12	126.9 306.9	7.5
Horizontal polarization; DA: Andrew ODDWUNGTV @ 0 deg								



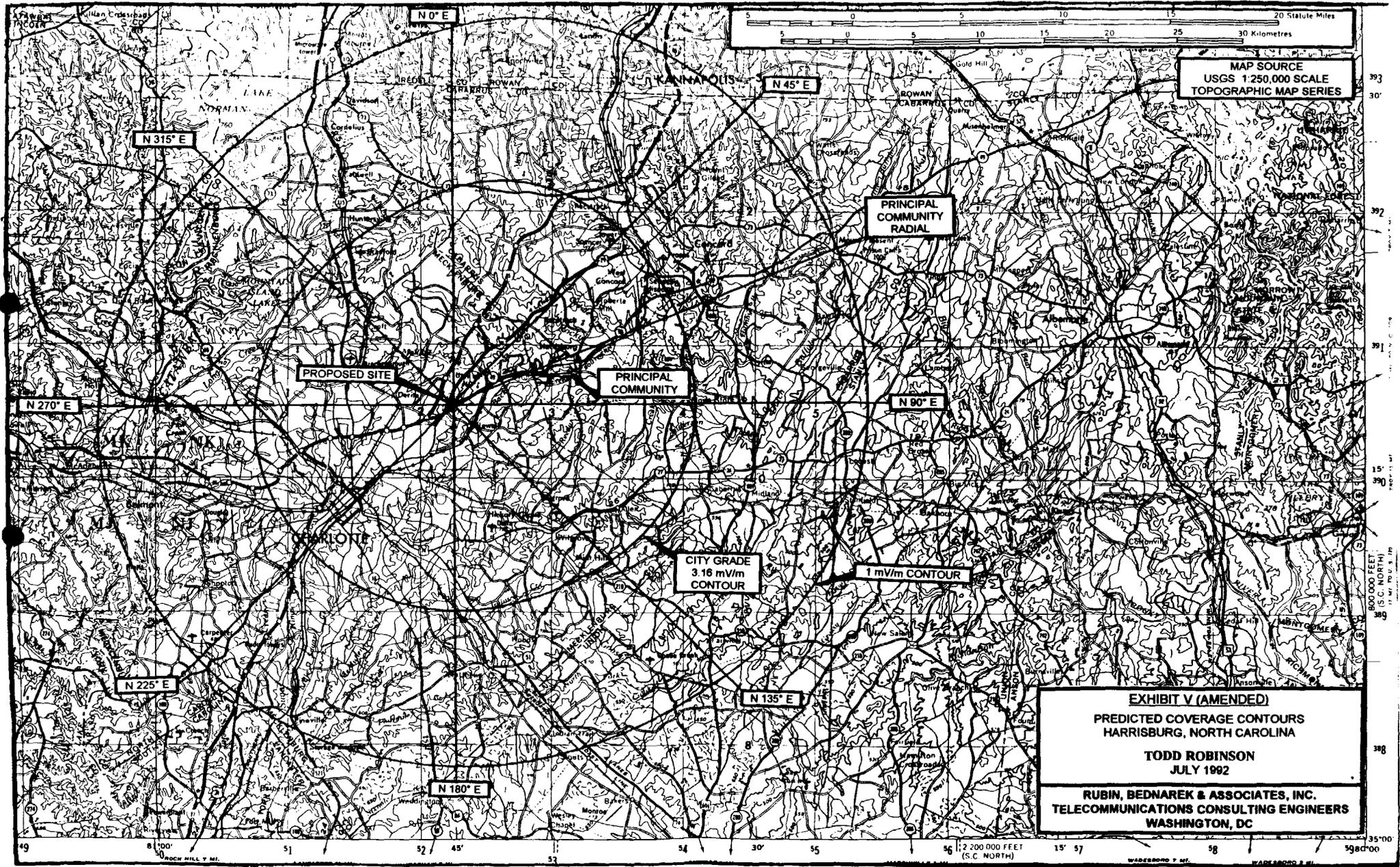
**DERITA QUADRANGLE
NORTH CAROLINA - MECKLENBURG CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)**

PROPOSED SITE

EXHIBIT IV (AMENDED)
TOPOGRAPHIC MAP SHOWING
LOCATION OF TRANSMITTER SITE
HARRISBURG, NORTH CAROLINA

TODD ROBINSON
JULY 1992

RUBIN, BEDNAREK & ASSOCIATES, INC.
TELECOMMUNICATIONS CONSULTING ENGINEERS
WASHINGTON, DC



MAP SOURCE
USGS 1:250,000 SCALE
TOPOGRAPHIC MAP SERIES

EXHIBIT V (AMENDED)
PREDICTED COVERAGE CONTOURS
HARRISBURG, NORTH CAROLINA
TODD ROBINSON
JULY 1992
RUBIN, BEDNAREK & ASSOCIATES, INC.
TELECOMMUNICATIONS CONSULTING ENGINEERS
WASHINGTON, DC

49 50 51 52 53 54 55 56 57 58 59
2 000 000 FEET (S.C. NORTH)
WADSWORTH 7 MI. WADSWORTH 8 MI.

RUBIN, BEDNAREK & ASSOCIATES, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS
1350 CONNECTICUT AVENUE, NW - SUITE 610
WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT VI

Radio Frequency Radiation Level Calculations

The following equation was extracted from OST Bulletin #65 and was used to determine radiation levels at ground level and at 2 meters above the ground for the specified antenna configurations:

$$S = \frac{(2.56)(1.64)(2)(ERP \text{ watts})(F^2)(1000 \text{ mW / watt})}{4\pi(R^2)}$$

where: S = power density (mW/cm^2)
 F = relative field factor in downward direction
 R = distance to the center of radiation (cm)

The maximum allowable radio frequency radiation at frequencies between 30 and 300 MHz is $1mW/cm^2$ according to the radio frequency protection guidelines contained in the ANSI C95.1-1982 standard (American National Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz).

The following variation of the above equation was used to determine the distance from the center of radiation of specified antenna configurations to the maximum allowable radiation level of $1 mW/cm^2$:

$$R = \sqrt{\frac{(2.56)(1.64)(2)(ERP \text{ watts})(F^2)(1000 \text{ mW / watt})}{4\pi(S)}}$$

For multiple antennas on the same tower, the total ERP from all antennas is assumed to be concentrated at the lowest element of the antenna that is the lowest on the tower. All calculations utilize the theoretical vertical radiation patterns for the specified antenna configurations.

RUBIN, BEDNAREK & ASSOCIATES, INC.
 CONSULTING TELECOMMUNICATIONS ENGINEERS
 1350 CONNECTICUT AVENUE, NW - SUITE 610
 WASHINGTON, DC 20036

New - Harrisburg, North Carolina

EXHIBIT VI

Radio Frequency Radiation Level Calculations

ERP	:	6.0 kW
RC-AGL	:	89 m
# of Antenna Bays	:	3
Element Spacing	:	1 wavelength
Distance of Lowest Antenna Element Above Ground	:	85.8 m
Relative Field Factor Used in Calculations	:	1.0

Calculations to determine the height on the tower (*H*) above which the ANSI maximum allowable radiation level of 1 mW/cm² would be exceeded.

$$R = \sqrt{\frac{(2.56)(1.64)(2)(ERP \text{ watts})(F^2)(1000 \text{ mW / watt})}{4\pi(S)}}$$

$$R = \sqrt{\frac{(2.56)(1.64)(2)(6,000)(1.0^2)(1000 \text{ mW / watt})}{4\pi(1 \text{ mW / cm}^2)}}$$

$$R = 2002.3 \text{ cm} = 20.02 \text{ m}$$

$$H = \text{Lowest Element Height (m AGL)} - R$$

$$H = 85.8 \text{ m} - 20.0 \text{ m} = 65.8 \text{ m}$$