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JUN 10 1995

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

|                                 |   |                      |
|---------------------------------|---|----------------------|
| In the Matter of                | ) |                      |
|                                 | ) |                      |
| Amendment of Section 73.202(b)  | ) |                      |
| Table of Allotment              | ) | MM Docket No. 94-155 |
| FM Broadcast Stations           | ) |                      |
| Big Pine Key, Key Colony Beach, | ) |                      |
| Naples, Tice, etc., Florida     | ) | RM-8468 and RM-8802  |
|                                 | ) |                      |

TO: Chief, Allocations Branch

COMMENTS OF STERLING COMMUNICATIONS

Sterling Communications Corp., licensee of Station WSGL, Naples, Florida, by its attorney, in response to the Public Notice released herein on May 24, 1996, hereby submits its comments in opposition to the "Joint Resolution" advanced by Palm Beach Radio Broadcasting, Inc., and Gulf Communications Corporation, most recently in their May 15, 1996 "Supplement" to their March 6, 1995 "Reply Comments" herein.<sup>1</sup>

This proceeding commenced in 1994 with a proposal to change allotments in four Florida communities involving three operating stations and one unbuilt permit. On February 17, 1995, four licensees and one permittee of stations in five other communities (self-styled "Counterproponents") filed their "Joint Comments and Counterproposal" proposing a total of eight channel changes. The

<sup>1</sup> Although the Public Notice refers at page 1 to a request received from Gulf on February 17, 1995, the description of the proposed amendments to the table of allotments at page two of the Public Notice is identical to the revised iteration of the "Joint Resolution" proposed for the first time in the May 15, 1996 "Supplement."

No. of Copies rec'd  
List A B C D E

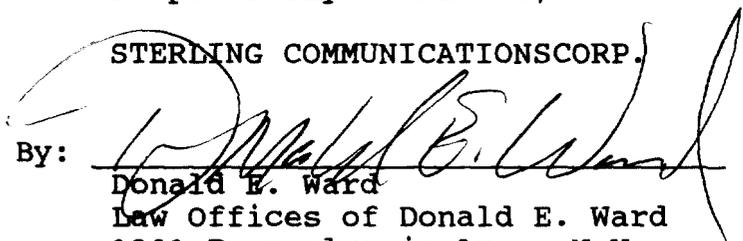
024

Counterproponents acknowledged therein that their core proposals had been rejected in MM Docket No. 93-136, and that their petition for reconsideration thereof was still pending.<sup>2</sup> Thus, the Counterproponents have sought to salvage their original proposals, rejected in MM Docket 93-136, by bootstrapping them to the instant proceeding.

Both the Counterproposal here and that offered in 93-136 include the modification of WSGL's allotment to change from Channel 276C3 to Channel 284C3. Such a change would be non-consensual on WSGL's part, since it would prevent any further upgrade of WSGL's facilities. By contrast, WSGL has had in preparation for some time an application to upgrade to Channel 276C2 at its present site. A copy of that application (expected to be formally filed with the Commission within the next two days) is attached hereto.

Respectfully submitted,

STERLING COMMUNICATIONSCORP.

By: 

Donald E. Ward  
Law Offices of Donald E. Ward  
1201 Pennsylvania Ave., N.W.  
Fifth Floor  
Washington, D. C. 20004  
(202) 626-6290

June 10, 1996

Its Attorney

---

<sup>2</sup> That Petition was denied by Memorandum Opinion and Order released June 14, 1995 (DA 95-1250). The Counterproponents timely filed an Application for Review thereof, which has not yet been acted upon.

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

Name of Applicant

**STERLING COMMUNICATIONS CORP.**

Call letters (if issued)

**WGCL (FM)**

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

If Yes, specify closing date: N/A

Purpose of Application: (check appropriate box(es))

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

File Number(s) HL-940630KB

1. Allocation:

| Channel No. | Principal community to be served: |         |       |
|-------------|-----------------------------------|---------|-------|
|             | City                              | County  | State |
| 276         | NAPLES                            | COLLIER | FL    |

Class (check only one box below)

- |  |                             |                            |                             |
|--|-----------------------------|----------------------------|-----------------------------|
| <input type="checkbox"/> A             | <input type="checkbox"/> B1 | <input type="checkbox"/> B | <input type="checkbox"/> C3 |
| <input checked="" type="checkbox"/> C2 | <input type="checkbox"/> C1 | <input type="checkbox"/> C |                             |

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. **5.1 km AT 223° FROM I-75/FLORIDA HWY 951 INTERSECTION, NAPLES, COLLIER COUNTY, FL**

(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 | 26° | 07' | 33" | Longitude | 81° | 43' | 17" |
|----------|-----|-----|-----|-----------|-----|-----|-----|

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.

138 m AGL (140 m AMSL)

SECTION V-8 - 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 |
|----------|-----------|

5. Has the FAA been notified of the proposed construction?

Yes  No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Exhibit No.  
N/A

Date JUNE 5, 1996 Office where filed SOUTHERN REGIONAL OFFICE

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>HARLES</u>           | <u>4.5</u>    | <u>310°</u>            |
| (b) <u>WING SOUTH (PVT)</u> | <u>3.1</u>    | <u>110°</u>            |

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

(1) of site above mean sea level: 2.0 meters

(2) of the top of supporting structure above ground (including antenna, all other appertenances, and lighting, if any): and 158.0 meters

(3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] 160.0 meters

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

(1) above ground 148.0 meters (H)

148.0 meters (V)

(2) above mean sea level [(aX1) + (bX1)] 150.0 meters (H)

150.0 meters (V)

(3) above average terrain 150.0 meters (H)

150.0 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)(2). 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.  
1

9. Effective Radiated Power:

(a) ERP in the horizontal plane 50 kw (H-) 50 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

N/A kw (H-) N/A kw (V-)

-Polarization

SECTION V-8 - 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.  
ENC-3

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.316(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 616 mV/m service.

Exhibit No.  
N/A

12. Will the main studio be within the protected 616 mV/m field strength contour of this proposal?

Yes  No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.126.

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 73.218 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.  
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.  
ENC-5

(e) If authorization pursuant to 47 C.F.R. Section 73.218 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.  
ENC-5

- (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(e) and 73.318.)

Exhibit No.  
\*

\*SEE ENGINEERING STATEMENT

SECTION V-8 - FM BROADCAST ENGINEERING DATA (Page 4)

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 (D). 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.  
NO CHANGE;  
ON FILE

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.  
N/A

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

(b) the 316 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 7,186 sq. km. Population 239,131

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sections/ 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 73.311)*

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

Linearly interpolated 30-second database  7.5 minute topographic map

(Source: MDG)

Other *(briefly summarize)*

## SECTION V-8 - FM BROADCAST ENGINEERING DATA (Page 6)

| Radial bearing<br>(degrees True) | Height of radiation<br>center above average<br>elevation of radial<br>from 0 to 16 km<br>(meters) | Predicted Distances                     |                                       |
|----------------------------------|---|---|---------------------------------------|
|                                  |   | To the 316 mV/m contour<br>(kilometers) | To the 1 mV/m contour<br>(kilometers) |
| 285°                             | 150.5   | 32.6                                    | 52.2                                  |
| 0                                | 150.5   | 32.0                                    | 51.5                                  |
| 45                               | 146.5   | 22.8                                    | 38.6                                  |
| 90                               | 150.5   | 20.3                                    | 34.5                                  |
| 135                              | 150.5   | 30.1                                    | 49.2                                  |
| 180                              | 150.5   | 32.6                                    | 52.2                                  |
| 225                              | 150.5   | 32.6                                    | 52.2                                  |
| 270                              | 150.5   | 32.6                                    | 52.2                                  |
| 315                              | 150.5   | 32.6                                    | 52.2                                  |

\*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.

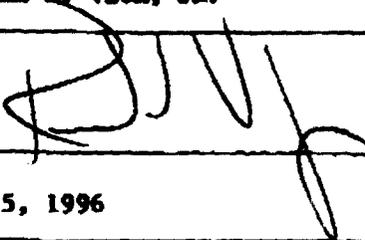
Exhibit No.  
N/A

If No, explain briefly why not.

\* SEE ENGINEERING STATEMENT

## 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)<br>RICHARD L. VEGA, JR.  | Relationship to Applicant (e.g., Consulting Engineer)<br>CONSULTING ENGINEER  |
| Signature<br> | Address (Include ZIP Code)<br>THE RICHARD L. VEGA GROUP<br>1245 W. FAIRBANKS AVENUE, SUITE 380<br>MUNICIPAL PARK, FLORIDA 32789 |
| Date<br>JUNE 5, 1996   | Telephone No. (Include Area Code)<br>(407) 682-7104   |

**ENGINEERING STATEMENT IN SUPPORT OF**

**AN APPLICATION FOR CONSTRUCTION PERMIT PROPOSING**

**A MODIFIED COMMERCIAL FM BROADCAST FACILITY**

**ON BEHALF OF**

**STERLING COMMUNICATIONS CORP.**

**NAPLES, FLORIDA**

**CHANNEL: 276 C2    FREQUENCY: 103.1 MHz**

Prepared by: THE RICHARD L. VEGA GROUP, INC.

• COPYRIGHT 1996

**INTRODUCTION:**

Sterling Communications Corp. ("Applicant"), licensee of FM Station WSGL, submits an application for a Construction Permit to construct a new modified full service FM Broadcast Facility operating at 50 kW on Channel 276 C2 (103.1 MHz) to serve Naples, Florida. This Engineering Statement, along with Section V-B of the FCC Form 301, provides the required technical data in support of this application. All questions answered fully in the attached Section V-B will not be addressed herein.

**ITEM 8:**

Exhibit 1 of this Engineering Statement is a vertical plan sketch of the proposed antenna support structure. The Applicant will utilize the existing tower structure, but will increase the current height for an overall height of 160.0 meters above ground level. The FAA has been notified of the proposed construction, since the existing tower height will be increased.

**ITEM 10:**

Attached as Exhibit ENG-3 is the directional antenna pattern data for the proposed facility, as required pursuant to Section 73.316 of the Commissions Rules. The proposed antenna complies with the requirements set forth in Section 73.316(b)(1) and Section 73.316(b)(2) of the Commissions Rules.

The antenna will be side-mounted on the tower structure in accordance with the manufacturers instructions. There will not be any other antenna of any type mounted at the same level or at a vertical distance closer than that as

recommended by the manufacturer. Since there are no other FM or TV stations located within 60 meters of the transmitting site, there will not be any negative effects on any existing operations.

**ITEM 13:**

The transmitting site location selected for the proposed facility does not satisfy the requirement of Section 73.207 of the Commissions Rules. The station is short-spaced to the existing facilities of Station WFKZ, licensed to Key Chain, Inc. in Plantation Key, Florida and WPBZ, licensed to Palm Beach Radio Broadcasting, Inc. in Indiantown, Florida. As such, this proposal requests authorization pursuant to Section 73.215 of the Commissions Rules which is further discussed in Exhibit Eng-5, attached herein. The pertinent contours of the proposed and existing facilities do not overlap, therefore, this application is filed consistent with the conditions outlined in Section 73.215 of the Commissions Rules.

**ITEM 14:**

Exhibit 2 is a table listing all proposed or authorized FM and TV transmitters within 8 kilometers of the proposed antenna. There are no known populated areas, established commercial or government receiving stations, cable head-end facilities within the blanketing contour. There are no proposed or authorized FM or TV transmitters within 10 kilometers of the proposed antenna which may produce receiver-induced intermodulation interference.

The proposed facility will cause no undesired effects to any facilities authorized or in use prior to the grant of this application. Should there be any undesired effects to any broadcast facility, however, the Applicant will accept full responsibility and cooperate fully in eliminating any objectionable interference.

The proposed transmitting site is NOT located within 320 kilometers of the U.S.-Canadian Border. There are no Canadian Facilities that would be effected by the grant of this proposed FM Station. However, the Applicant will cooperate fully and in good faith to resolve any problems that may occur in the future.

The Applicant certifies that in the event of a power outage, auxiliary power will be available at the proposed transmitter and studio site to ensure continued and uninterrupted service to the community.

**ITEM 15:**

There will not be any change to the location of the currently authorized transmitting site. As such, a full scale 7.5 minute map has been omitted from this filing.

**ITEM 16:**

Exhibit ENG-4 attached is a coverage contour map (U.S. Geological Survey, 1:250,000 scale map of Miami, West Palm Beach, and Tampa) for the proposed modified facility. This map depicts all information as required by Item 16 of FCC Form 301, Section V-B.

**ITEM 20:****ENVIRONMENTAL STATEMENT**

Construction of the proposed facility is NOT a major action in accordance with Section 1.1305 of the Commissions Rules (amended in Report and Order Docket No. 79-163, adopted November 25, 1985), and therefore, no Environmental Assessment is required.

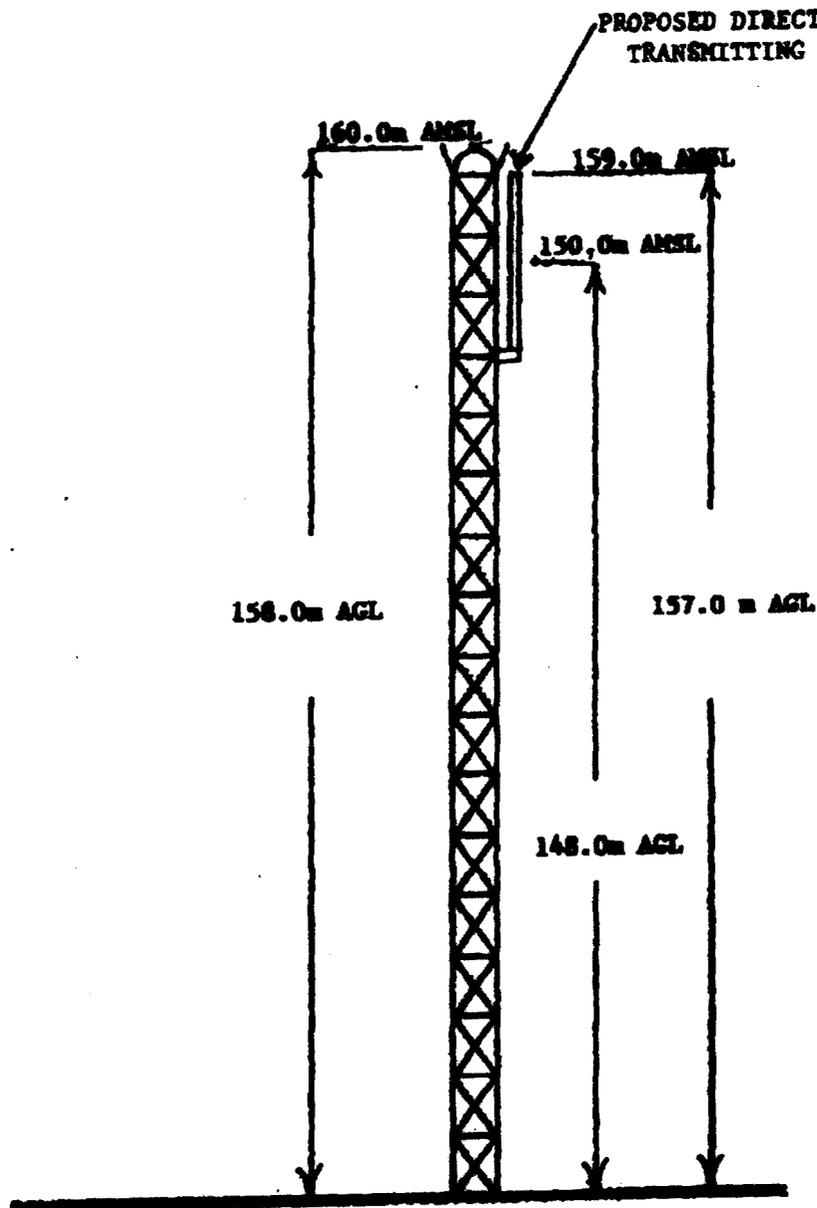
The proposed facility a) will not be located in a sensitive area (e.g., an officially designated wilderness area, a wildlife area, a wildlife preserve area, a flood plain), nor will it physically or visually affect sites significant in American History; b) will not involve significant change in surface features; c) will not be equipped with high intensity white lights; d) will not expose workers or the general public to levels of 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), by the Institute of Electrical and Electronics Engineers, Inc.

**METHODS EMPLOYED:**

All technical data presented herein has been prepared in compliance with all pertinent FCC Rules and sound engineering practice.

Not drawn to scale  
Not all existing antennas  
shown on illustration.

EXISTING SUPPORT STRUCTURE



GROUND ELEVATION: 2 METERS AMSL

|   |   |   |
|---|---|---|
| <p>Prepared by:<br/>The Richard L. Vega Group</p> | <p>STERLING COMMUNICATIONS CORP.<br/>NAPLES, FLORIDA<br/>FM RADIO<br/>CHANNEL: 276C2 ERP: 50 kW</p> | <p>Antenna Support<br/>Structure</p> <p>EXHIBIT<br/>ENG - 1</p> |
|---|---|---|

**EXHIBIT ENG-3**

**DIRECTIONAL ANTENNA DATA  
FOR  
STERLING COMMUNICATIONS CORP.  
NAPLES, FLORIDA**

**FM ANTENNA TYPE:**

**ERI (HARRIS) FML-12C-DA-HW  
ROTOTILLER DIRECTIONAL**

**Prepared by: THE RICHARD L. VEGA GROUP, INC.**

**1245 W. Fairbanks Ave, Suite 380**

**Winter Park, Florida 32789**

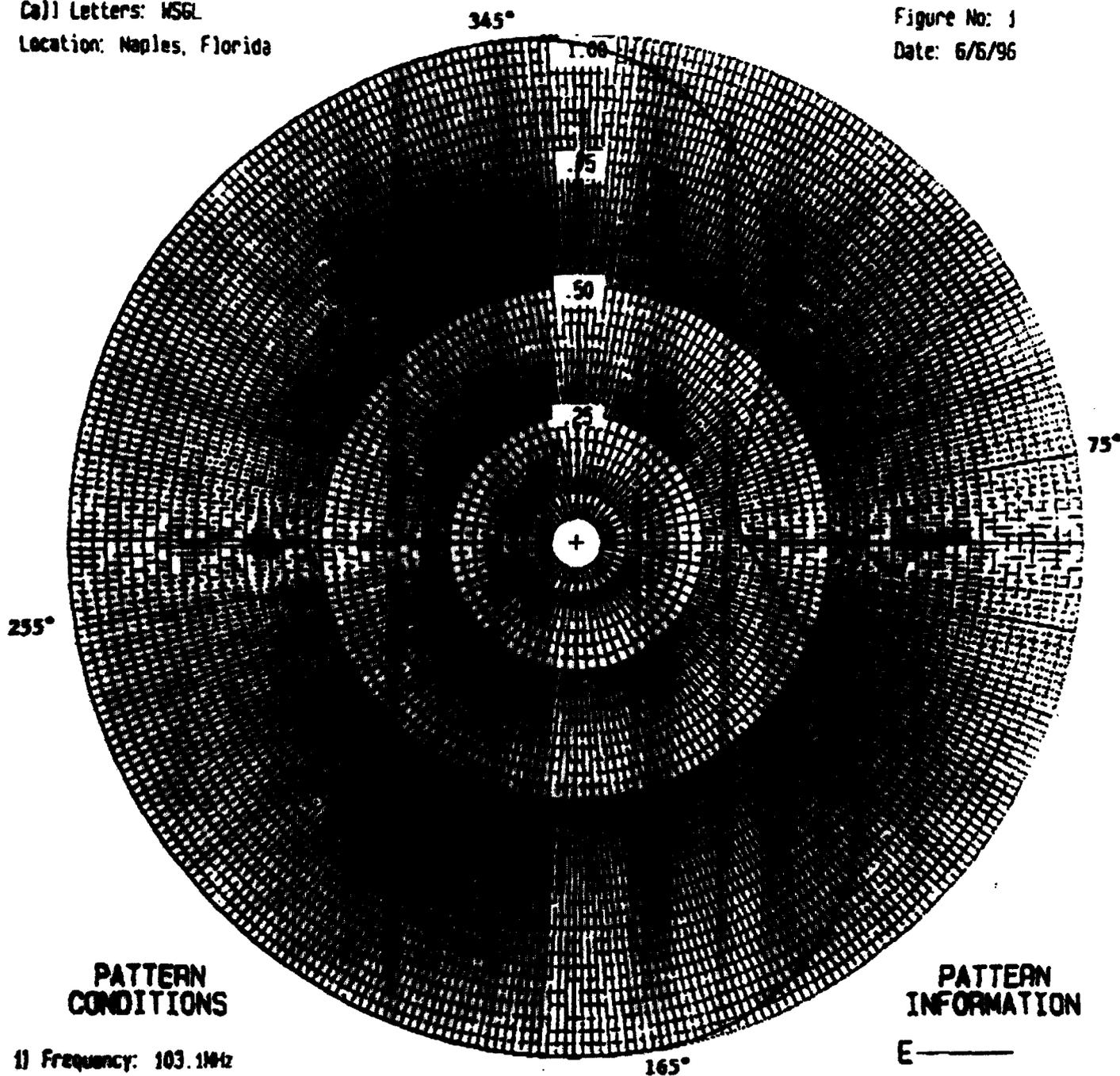
**(407) 682-7104**

# ERI HORIZONTAL PLANE RELATIVE FIELD ENVELOPE PATTERN

ERC-3 PAGE 2

Call Letters: WGL  
Location: Naples, Florida

Figure No: 1  
Date: 6/6/96



### PATTERN CONDITIONS

### PATTERN INFORMATION

- 1) Frequency: 103.1MHz
- 2) Antenna Type: FM-12C-DA-HW
- 3) Antenna Orientation: North 255 Deg. East
- 4) Antenna Mounting: Standard
- 5) Tower Type: 24' face tower
- 6) Comments: The measured H & V patterns will not exceed this pattern at any azimuth.

### ENVELOPE

RMS .8645  
 Maximum: 1 @ 165-345°  
 Minimum: .3162 @ 75°

## HORIZONTAL PLANE TABULATED FIELD DATA

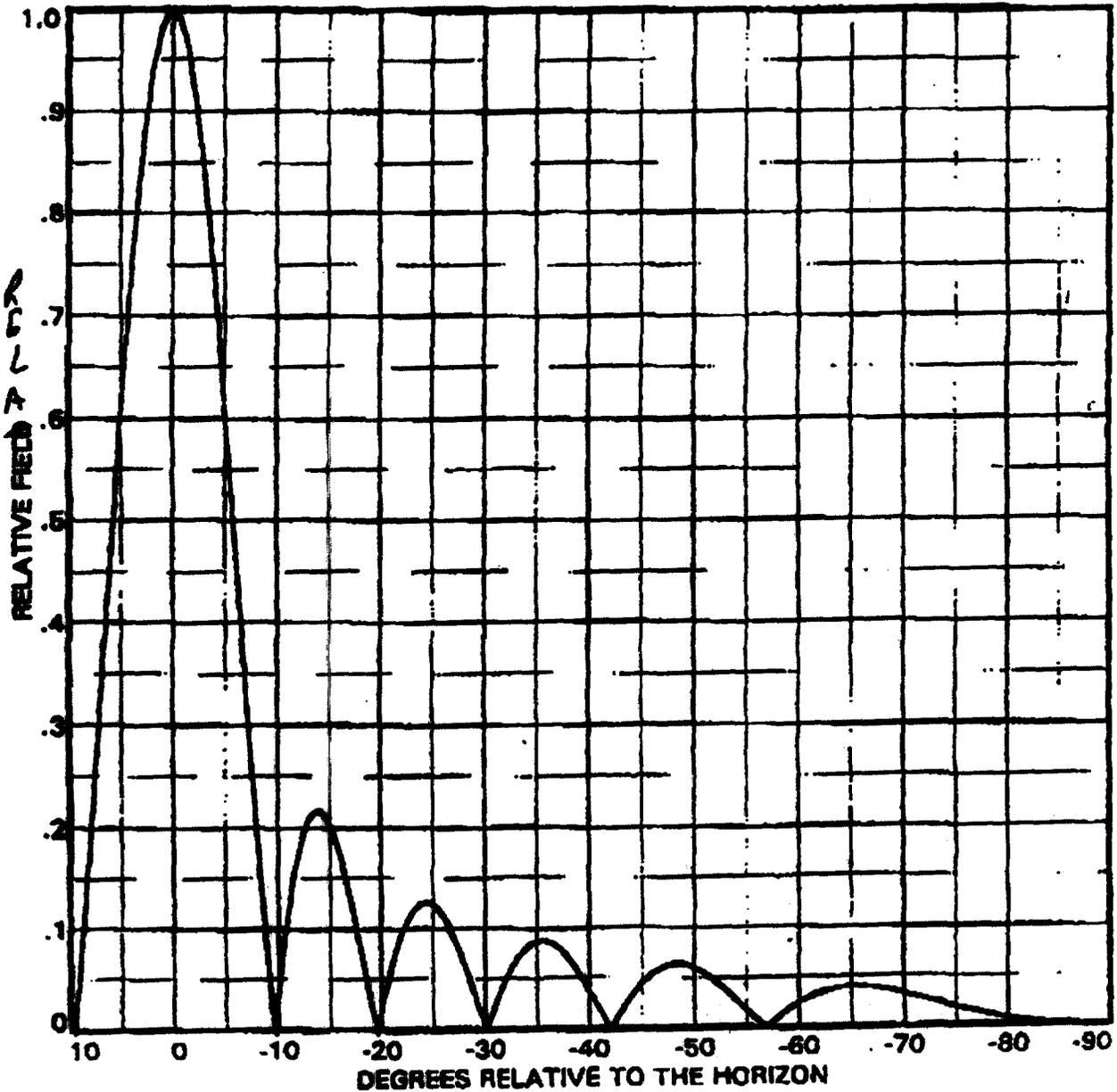
| AZIMUTH | RELATIVE<br>FIELD | AZIMUTH | RELATIVE<br>FIELD |
|---------|-------------------|---------|-------------------|
| 0°      | 0.960             | 180°    | 1.000             |
| 5°      | 0.931             | 185°    | 1.000             |
| 10°     | 0.893             | 190°    | 1.000             |
| 15°     | 0.848             | 195°    | 1.000             |
| 20°     | 0.792             | 200°    | 1.000             |
| 25°     | 0.729             | 205°    | 1.000             |
| 30°     | 0.658             | 210°    | 1.000             |
| 35°     | 0.587             | 215°    | 1.000             |
| 40°     | 0.524             | 220°    | 1.000             |
| 45°     | 0.470             | 225°    | 1.000             |
| 50°     | 0.424             | 230°    | 1.000             |
| 55°     | 0.386             | 235°    | 1.000             |
| 60°     | 0.356             | 240°    | 1.000             |
| 65°     | 0.334             | 245°    | 1.000             |
| 70°     | 0.321             | 250°    | 1.000             |
| 75°     | 0.316             | 255°    | 1.000             |
| 80°     | 0.321             | 260°    | 1.000             |
| 85°     | 0.334             | 265°    | 1.000             |
| 90°     | 0.356             | 270°    | 1.000             |
| 95°     | 0.386             | 275°    | 1.000             |
| 100°    | 0.424             | 280°    | 1.000             |
| 105°    | 0.470             | 285°    | 1.000             |
| 110°    | 0.524             | 290°    | 1.000             |
| 115°    | 0.587             | 295°    | 1.000             |
| 120°    | 0.658             | 300°    | 1.000             |
| 125°    | 0.729             | 305°    | 1.000             |
| 130°    | 0.792             | 310°    | 1.000             |
| 135°    | 0.846             | 315°    | 1.000             |
| 140°    | 0.893             | 320°    | 1.000             |
| 145°    | 0.931             | 325°    | 1.000             |
| 150°    | 0.960             | 330°    | 1.000             |
| 155°    | 0.982             | 335°    | 1.000             |
| 160°    | 0.995             | 340°    | 1.000             |
| 165°    | 1.000             | 345°    | 1.000             |
| 170°    | 1.000             | 350°    | 0.995             |
| 175°    | 1.000             | 355°    | 0.982             |

MAXIMUM RELATIVE FIELD = 1.000 @ 260°  
 MINIMUM RELATIVE FIELD = 0.316 @ 80°

# THEORETICAL VERTICAL PLANE RELATIVE FIELD PATTERN

FIGURE # 3  
Naples, Florida  
WSGL  
103.1MHz  
12 BAY FML-12C-DA-HW ANTENNA

June 6, 1996  
0 DEGREE BEAM TILT  
0 PERCENT FIRST NULL FILL  
0 PERCENT SECOND NULL FILL



**EXHIBIT ENG-4**  
**PROPOSED 60dBu AND 70dBu MAP**  
 FOR  
**STERLING COMMUNICATIONS CORP.**  
**NAPLES, FL**

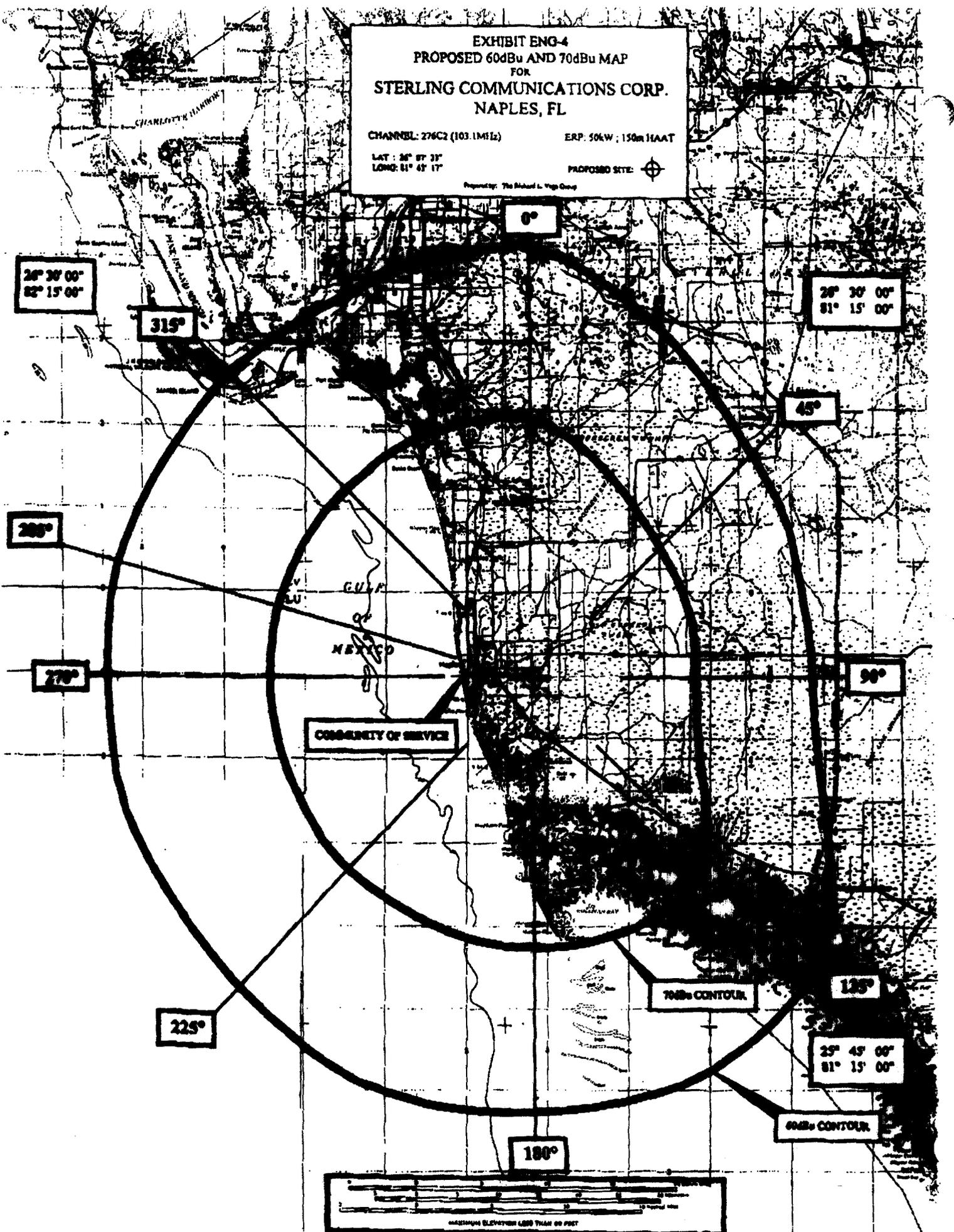
CHANNEL: 276C2 (103.1Mhz)

ERP: 504W ; 150m HAAT

LAT : 26° 07' 31"  
LONG: 81° 45' 17"

PROPOSED SITE: 

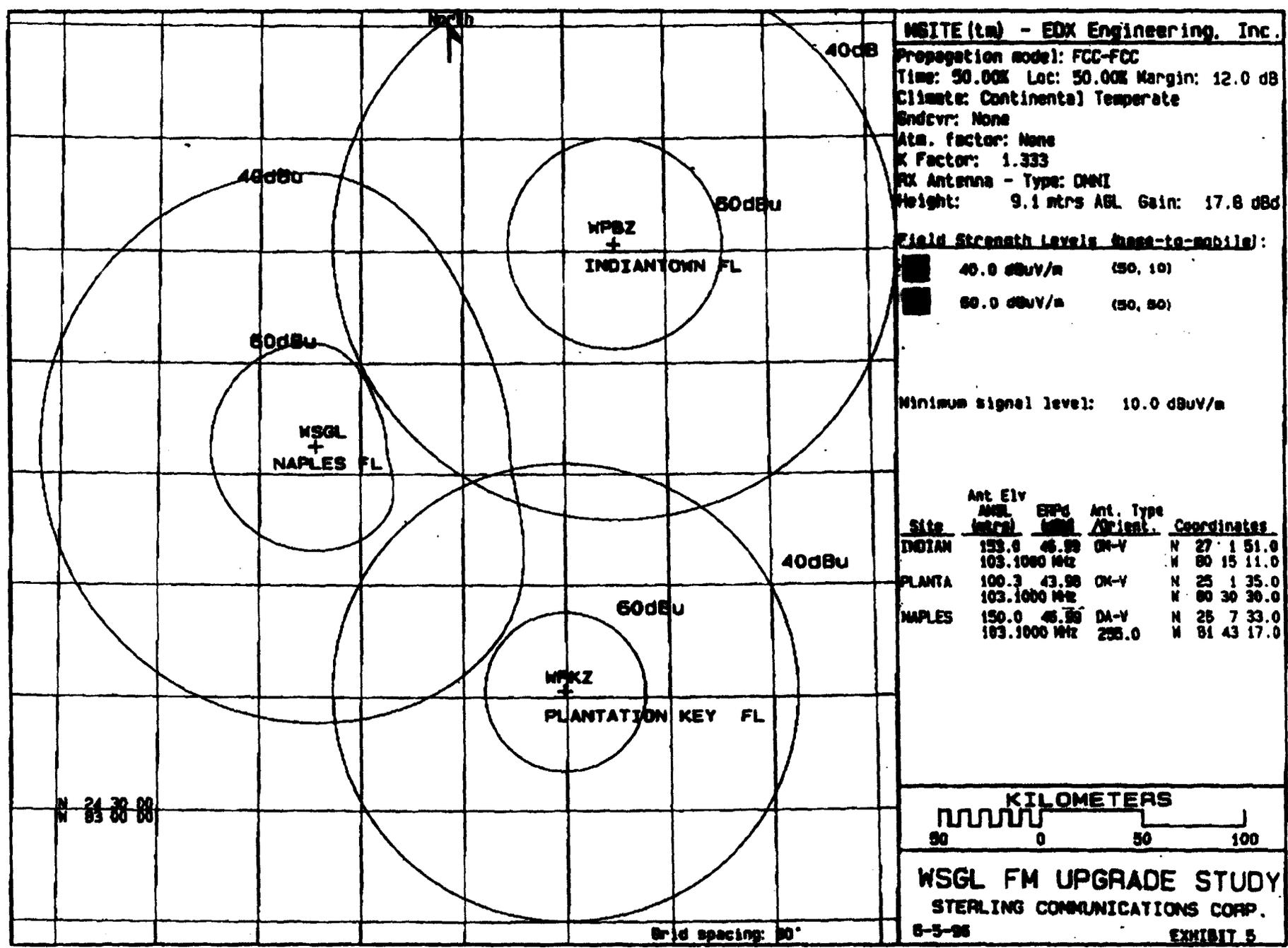
Property: The Richard L. Vega Group



## INTRODUCTION-EXHIBIT ENG-5

The FM upgrade/classification change for Naples, Florida, is short spaced to existing station WFKZ, licensed to Key Chain, Inc, in Plantation Key, Florida, and station WPBZ, licensed to Palm Beach Radio in Indiantown, Florida. Therefore, WSGF in Naples seeks authorization pursuant to Section 72.215 of the Commissions Rules regarding short spaced facilities. The existing transmitter site for this application meets the minimum distance separation requirements as provided under Section 73.215(c) of the Commissions Rules.

Attached is a computer generated contour map depicting the proposed and existing facilities' interfering and protected signal contours as calculated in accordance with Section 73.215(a)(1) and Sections 73.215(a)(2) of the Commissions Rules. The attached exhibit fully demonstrates that there will not be any contour overlap of the protected and interfering contours of each station analyzed.



N 24 30 00

**EXHIBIT ENG-2**

**STATIONS WITHIN**

**FOR**

**STERLING COMMUNICATIONS CORP.**

**NAPLES, FLORIDA**

**Prepared by: THE RICHARD L. VEGA GROUP, INC.**

**1245 W. Fairbanks Ave, Suite 380**

**Winter Park, Florida 32789**

**(407) 682-7104**

EXHIBIT ENG-2  
STATIONS WITHIN STUDY  
FOR  
STERLING COMMUNICATIONS CORP.  
NAPLES, FLORIDA

FM STATIONS WITHIN 10 KM

Title: NAPLES, FLORIDA  
Channel 201 to 300  
Database: DW 05/15/96

Latitude: 26-07-33  
Longitude: 81-43-17

| Call City of license   | Auth license name St            | Licensee name FCC file no. | Channel freq | H-kw H-m | V-kw V-m | Latitude Longitude | Br-to -from | Dist (km) |
|--|---------------------------------|----------------------------|--------------|----------|----------|--------------------|-------------|-----------|
| WSRX NAPLES  | CP SHADOWLAWN ASSOCIATION, FL   | *208C3 BLED-920819MB       | 20.0 89.5    | 20.0 76  | 0DA 76   | 26-07-33 81-43-17  | .0 .0       | .0        |
| BMPED-950929JB EXT GRD 4/30/96(43731-5/6/96); Was WBPT 06/05/92 per FCC release #184 dated 06/05/92                                      |                                 |                            |              |          |          |                    |             |           |
| WSRX NAPLES  | LIC SHADOWLAWN ASSOCIATION, FL  | *208A BLED-911015KA        | 20.0 89.5    | .55 76   | .55 76   | 26-07-34 81-43-18  | 318.1 138.1 | .0        |
| Was WBPT 06/05/92 per FCC release #184 dated 06/05/92; Ant: Harris FML-2E  |                                 |                            |              |          |          |                    |             |           |
| WSRX NAPLES  | APP SHADOWLAWN ASSOCIATION, FL  | *208C3 BLED-960227IH       | 20.0 89.5    | 20.0 69  | 0DA 69   | 26-07-33 81-43-37  | 270.0 90.0  | .6        |
| Tendered per FCC release #23703 dated 03/27/96, accepted per 23705 dated 03/29/96; Was WBPT 06/05/92 per FCC release #184 dated 06/05/92 |                                 |                            |              |          |          |                    |             |           |
| WNOG-FM NAPLES   | LIC PALMER COMMUNICATIONS, I FL | 228A 93.5                  | 3.00 93.5    | 3.00 91  |          | 26-07-21 81-43-22  | 200.5 20.5  | .4        |
| Deletion proposed; BRH-951002E7 GRD 4/4/96(43712-4/9/96); Was WRGI 05/21/93 per FCC release #205 dated 05/28/93                          |                                 |                            |              |          |          |                    |             |           |
| PRM NAPLES   | DELETION PROPOSED FL            | 228A DOC-94-155            | 228A 93.5    |          |          | 26-07-21 81-43-22  | 200.5 20.5  | .4        |
| Deletion proposed; PRM adopted 12/15/94, released 12/27/94; RM-8468  |                                 |                            |              |          |          |                    |             |           |
| WGUF MARCO   | APP INTERMART BCG OF NAPLES, FL | 255A BPH-950223IA          | 6.00 98.9    | 6.00 100 |          | 26-03-11 81-42-11  | 167.3 347.3 | 8.3       |
| Amended 01/24/96; Call Granted 10/03/90 per FCC release #144 dated 10/05/90  |                                 |                            |              |          |          |                    |             |           |
| WGUF MARCO   | LIC INTERMART BCG OF NAPLES, FL | 255A BMLH-950109KB         | 6.00 98.9    | 6.00 100 |          | 26-03-01 81-42-08  | 167.2 347.2 | 8.6       |
| DOC-92-282; RM-8185; Call Granted 10/03/90 per FCC release #144 dated 10/05/90; Ant: Elec. Res. Inc. FMH-2AE                             |                                 |                            |              |          |          |                    |             |           |
| WSGL NAPLES  | LIC STERLING COMMUNICATIONS FL  | 276C3 BLH-940630KB         | 14.0 103.1   | 14.0 134 |          | 26-07-33 81-43-17  | .0 .0       | .0        |
| DOC-89-434; RM-6866; Ant: Elec. Res. Inc. FML-3C   |                                 |                            |              |          |          |                    |             |           |
| PRM NAPLES   | PROPOSED RULE MAKING FL         | 284A DOC-94-155            | 284A 104.7   |          |          | 26-07-21 81-43-22  | 200.5 20.5  | .4        |
| PRM adopted 12/15/94, released 12/27/94; RM-8468   |                                 |                            |              |          |          |                    |             |           |

>> End of FM within 10.0 km <<

EXHIBIT ENG-2  
STATIONS WITHIN STUDY  
FOR  
STERLING COMMUNICATIONS CORP.  
NAPLES, FLORIDA

TV within 10.0 km

Title: NAPLES, FLORIDA  
Channel 2 to 69  
Database: DW 05/30/96

Latitude: 26-07-33  
Longitude: 81-43-17

| Call            | Auth | Licensee name   | Chan. | ERP  | HAMSL-m | Latitude  | Br-to | Dist |
|-----------------|------|-----------------|-------|------|---------|-----------|-------|------|
| City of license | St   | FCC file number | Zone  | (kW) | HAAT-m  | Longitude | -from | (km) |
| ATV-PRM         |      |                 | 43    |      |         | 26-08-12  | 278.1 | 8.6  |
| NAPLES          | FL   |                 | III   |      |         | 81-48-24  | 98.0  |      |
| DOC-87-268;     |      |                 |       |      |         |           |       |      |
| ATV-PRM         |      |                 | 68    |      |         | 26-08-12  | 278.1 | 8.6  |
| NAPLES          | FL   |                 | III   |      |         | 81-48-24  | 98.0  |      |
| DOC-87-268;     |      |                 |       |      |         |           |       |      |

>> End of TV within 10.0 km <<

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AM Within 10.0 km

Title: NAPLES, FLORIDA  
Channel 530 to 1600  
Database: DW 05/24/96

Latitude: 26-07-33  
Longitude: 81-43-17

| Call            | Auth | Licensee name | Freq | Class | D-kW | RMS       | Latitude | Br-to | Dist |
|-----------------|------|---------------|------|-------|------|-----------|----------|-------|------|
| City of License | St   | FCC file no.  | Oper | N-kW  | RMS  | Longitude | -from    | (km)  |      |

>> End of AM within 10.0 km <<

Certificate of Service

I, Donald E. Ward, hereby certify that on this 10th day of June, 1996, I have served the foregoing Comments by placing copies thereof in the U.S. Mail, postage prepaid, and addressed to the following:

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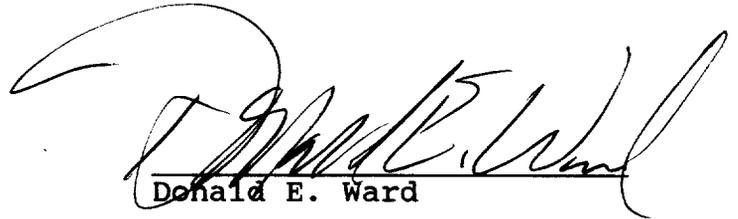
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