

statements to Turro prior to the issuance of the *HDO*. However, the Commission has no knowledge of whether Turro may have obtained copies of those statements from the commission's files or from other sources.

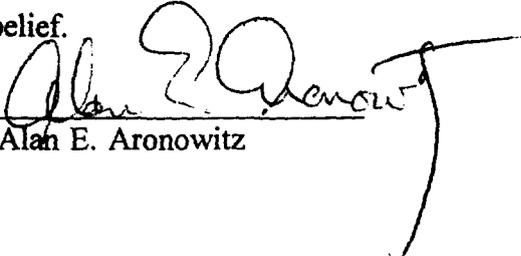
62. Admit, to the extent that the Commission has considerable discretion in the manner it conducts any investigation and employs various investigative techniques to assess possible licensee misconduct based on information brought to its attention .

63. Deny. The Commissions June 21, 1995, letter of inquiry directed to Turro put Turro on notice of violations related to some of the allegations set forth in the *HDO*.

64. Admit.

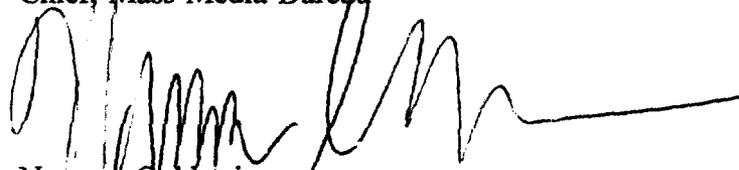
65. Admit.

I, Alan E. Aronowitz, hereby swear under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief.


Alan E. Aronowitz

Respectfully submitted,

Roy J. Stewart
Chief, Mass Media Bureau



Norman Goldstein
Chief, Complaints & Political
Enforcement Division
Mass Media Bureau



Alan E. Aronowitz
Attorney
Mass Media Bureau



Suzan B. Friedman
Attorney
Mass Media Bureau

Federal Communications Commission
2025 M Street, N.W., Suite 8210
Washington, D.C. 20554
(202) 418-1430

September 5, 1997

CERTIFICATE OF SERVICE

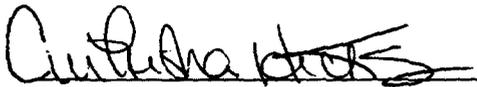
CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 5th day of September 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing **"Response of Mass Media Bureau to Gerard A. Turro's Request for Admissions of Fact and Genuineness of Documents"** to:

Administrative Law Judge Arthur I. Steinberg
Federal Communications Commission
2000 L Street, N.W., Suite 228
Washington, D.C. 20554

Alan Y. Naftalin, Esq.
Charles R. Naftalin, Esq.
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Washington, D.C. 20036

James P. Riley, Esq.
Fletcher, Heald and Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036


CurTrisha Hicks

TURRO EXHIBIT NO. 27

*Turro Hearing Back
10/15/97 Bureau Staff Response
to Request for Admissions*

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re)
)
GERARD A. TURRO)
)
For Renewal of License)
for FM Translator Stations)
)
)
W276AQ(FM), Fort Lee, NJ, and)
W232AL(FM), Pomona, NY)
)
MONTICELLO MOUNTAINTOP)
BROADCASTING, INC.)
)
Order to Show Cause Why the Construction)
Permit for FM Radio Station WJUX(FM),)
Monticello, NY, Should Not Be Revoked)
)
To: Gerard A. Turro

MM Docket No. 97-122
File Nos. BRFT-970129YC
BRFT-970129YD

Case No. 97-122 Official Exhibit No. T-27
Disposition: Identified
Rejected Received
IN THE MATTER OF: Turro
11-24-97 Shouval
Date: Witness: Reporter:

No. Pages: _____

SUPPLEMENTAL RESPONSE OF MASS MEDIA BUREAU TO GERARD A. TURRO'S REQUEST FOR ADMISSIONS OF FACT AND GENUINENESS OF DOCUMENTS

On August 8, 1997, Gerard A. Turro ("Turro") by his attorneys, submitted to the Mass Media Bureau ("Bureau") a Request for Admissions of Fact and Genuineness of Documents. The Bureau, by counsel, hereby supplements its response of September 5, 1997, as follows.

Supplemented Responses

6. Admit as follows. On April 13 and/or 14, 1995, Mr. Loginow observed that Station WMG-499 was operating, and he observed that it was pointed in a southerly direction towards Fort Lee. The Bureau is prepared to stipulate and Loginow is prepared to testify that

Loginow did not test whether the Fort Lee translator was receiving the Jukebox Radio programming from Dumont via Station WMG-499, or whether the Fort Lee translator was receiving the Jukebox Radio programming off the air from the Pomona translator and the Pomona translator was receiving the Jukebox Radio programming off the air from the Monticello station at that time.

14. Admit.

16. Admit as follows. Loginow knew the location of the Fort Lee translator equipment on May 15, 1995. The Bureau is prepared to stipulate and Loginow is prepared to testify that he did not view that equipment that day, as that was not necessary to the testing he conducted. Further, the Bureau is prepared to stipulate and Loginow is prepared to testify that he did not determine that that equipment "was actually tuned to receive the Pomona translator's frequency."

17. Admit as follows. Loginow knew the location of the Fort Lee translator's equipment on May 15, 1995. The Bureau is prepared to stipulate and Loginow is prepared to testify that he did not view that equipment that day, as that was not necessary to the testing he conducted. Further, the Bureau is prepared to stipulate and Loginow is prepared to testify that he did not determine that that equipment "was actually tuned to receive the Monticello Station's frequency."

20. Admit.

21. Neither admit nor deny. The Bureau is prepared to stipulate and Loginow is prepared to testify that he did no testing of the type previously described in Loginow's responses to the interrogatories directed to him. Loginow's monitoring of the off-air signal,

and his comparison with what he had previously heard, led to his conclusion that the Fort Lee translator could not be receiving the programming off the air from the Pomona translator.

22. Neither admit nor deny. The Bureau is prepared to stipulate and Loginow is prepared to testify that, due to his personal observation of the audio quality of the Fort Lee translator's output transmissions, he assumed that the Jukebox Radio programming was being delivered to the Fort Lee translator "by alternate means, presumably via telephone lines." This assumption was based on not only his personal observation, but also on his conclusion that the signal quality he heard in July, 1995, was too high for the translator system based upon what he previously observed. The assumption that the alternate means for the delivery system was via telephone lines was made upon his recollection that the use of telephone lines was alleged in the original complaint. Moreover, his observations did not rule out the use of telephone lines for the quality of the signal he heard that day.

23. Admit.

24. Admit.

27. The Bureau is prepared to stipulate and Loginow is prepared to testify that Loginow cannot specifically recall.

28. The Bureau is prepared to stipulate and Loginow is prepared to testify that Turro cooperated fully with Loginow during his inspections of the Fort Lee and Pomona translator stations.

32. Admit.

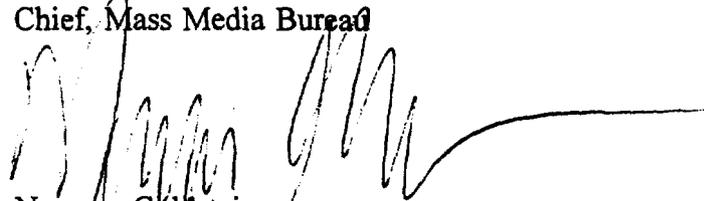
46. Admit. Loginow recalls taking no notes or otherwise recording his observations in writing in Turro's presence during the course of his activities on August 2, 1995.

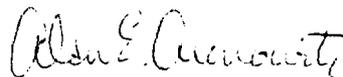
I, Alan E. Aronowitz, hereby swear under penalty of perjury that the foregoing supplemented answers are true and correct to the best of my knowledge and belief.

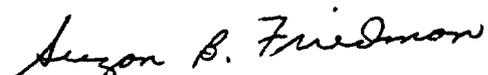

Alan E. Aronowitz

Respectfully submitted,

Roy J. Stewart
Chief, Mass Media Bureau


Norman Goldstein
Chief, Complaints & Political
Enforcement Division
Mass Media Bureau


Alan E. Aronowitz
Attorney
Mass Media Bureau


Suzan B. Friedman
Attorney
Mass Media Bureau

Federal Communications Commission
2025 M Street, N.W., Suite 8210
Washington, D.C. 20554
(202) 418-1430

October 15, 1997

CERTIFICATE OF SERVICE

Talya Lewis, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 15th day of October 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing "**Supplemental Response of Mass Media Bureau to Gerard A. Turro's Request for Admissions of Fact and Genuineness of Documents**" to:

Administrative Law Judge Arthur I. Steinberg
Federal Communications Commission
2000 L Street, N.W., Suite 228
Washington, D.C. 20554

Alan Y. Naftalin, Esq.
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Koteen & Naftalin
1150 Connecticut Ave., N.W.
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James P. Riley, Esq.
Fletcher, Heald and Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036


Talya Lewis

TURRO EXHIBIT NO. 28

TC-8

Remote Control System

INSTRUCTION MANUAL

Federal Communications Commission	
Docket No. <u>97-122</u>	Exhibit No. <u>T-28</u>
Presented by <u>TWTO</u>	
Disposition	Classified <input checked="" type="checkbox"/>
	Declassified <input checked="" type="checkbox"/>
	Excluded <input type="checkbox"/>
Reporter <u>E</u>	
Date <u>11-24-97</u>	

Burk Technology, Inc.
7 Beaver Brook Road
Littleton, MA 01460
(508) 486-0086

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TDXV2.4 FIRMWARE ENHANCEMENTS

Power to Linear Conversion

Transmitter firmware version 2.4 incorporates the ability to convert voltage samples to squared samples, primarily to support voltage samples of transmitter output power.

Linear or power metering is selected for each channel separately. To select power or linear, follow the instructions in the manual for setting the decimal point. Each time the decimal point reaches the fourth position, the CHANNEL digit will either show or extinguish a decimal point. Pressing the switch four more times will rotate the decimal point to its original position and again toggle the linear/power mode.

If the CHANNEL decimal point is on, power conversion is on for that channel. The studio display will not show this change.

Make certain that the linear mode (CHANNEL decimal OFF) is selected for all channels except those which are intended to be squared.

Channel 9

The quality of the control link is constantly monitored by the transmitter unit. Channel 9 displays a number from 0 to 99 to indicate the performance of the link. If the displayed number is less than 99, errors are being received and the link should be checked for proper levels, and the absence of noise. A display of zero indicates that no data has been received for at least one second.

This display is only available at the transmitter. A flashing display at the studio indicates faulty transmitter data.

Antenna Monitor Interface

The optional antenna monitor interface has been improved with version 2.4 to permit the full use of the status channels except when the antenna monitor channels are selected.

In addition, the tower select lines are only asserted when one of the units is set to an antenna monitor channel.

Firmware with the antenna monitor interface is labeled "TDXv2.4Ax", where x is the number of towers (4-8).

TC-8
REMOTE CONTROL SYSTEM
INSTRUCTION MANUAL

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SECTION ONE

DESCRIPTION

The TC-8 Remote Control System allows control and monitoring of a broadcast transmitter plant from a studio or other remote location.

The system consists of two physically identical units, each requiring a single unit of rack space (1-3/4 inches) in a standard EIA nineteen inch rack. The unit designated as the transmitter unit includes the input and output connectors to connect to the equipment to be monitored and controlled. The unit designated as the studio unit is installed at the remote control point.

Telemetry channels allow monitoring of eight DC samples which are typically scaled down from important voltage, current, or power values at the transmitter plant. These values are displayed in a four digit format on a dot-matrix array at both the studio and transmitter.

Eight status inputs provide a tally for various on/off conditions at the transmitter plant. Typical applications for these channels include monitoring of antenna switches, overload indicators, generator status, security alarms, and smoke detectors.

Sixteen outputs designated as "raise" and "lower" for each of the eight channels allow control of transmitters, generators, antenna switches and other plant equipment. Two additional outputs are provided, one for fail-safe and one to indicate a loss of the link between studio and transmitter. The raise, lower, and fail-safe outputs are open collector with sufficient drive (250 ma) for direct interface in many installations. Each output is protected from over-current.

Mechanical relay outputs are available on an optional interface panel which also provides barrier strip connections for the status and metering inputs. This panel may be conveniently located at the rear of a rack and plugged into the unit, permitting the TC-8 to be easily removed for maintenance.

The link between studio and transmitter may be either wire or radio. Wire links are typically voice grade telephone lines but may be any circuit that will pass standard Bell 103 modem tones. The 300 baud data does not require conditioned lines in most cases. Radio links are typically an STL subcarrier for the studio to transmitter path and an FM subcarrier for the return link. A 450 MHz TRL transmitter may also be used to provide the return path. Modems appropriate for the type of service are provided with the

TC-8. A change in link type may be accomplished at any time by plugging in the appropriate modem board. Burk Technology will exchange modems for a nominal charge.

The studio unit may be connected to a personal computer via the computer interface option. This option greatly expands the versatility of the TC-8, allowing automatic mode changes, limits monitoring, full screen display, and automatic logging. This option may be field installed at any time.

Controls and Displays

Six push-button switches on the front panel control the operation of the TC-8. Channel selection and raise and lower outputs may be controlled from either the transmitter or studio unit. From the transmitter, a maintenance mode may be selected which disables studio control and overrides the fail-safe output. Additionally, calibration and setup of status input polarity and decimal point locations is accomplished by means of the front panel switches at the transmitter.

A five digit dot-matrix array on each unit displays the channel selected and the associated analog value. The decimal point for each channel is programmed during setup and may be altered at any time from the front panel of the transmitter unit. The studio display flashes if the link from the transmitter to the studio is lost but the most recent data is still available for all channels.

Eight LED's display status with normally on or normally off indications individually selectable from the front panel of the transmitter unit.

LED indicators on the maintenance, setup, and calibrate switches provide mode indication at both the studio and the transmitter.

Calibration

Front panel calibration allows each channel to be calibrated from the transmitter without the assistance of the studio operator. The indicated value is increased or decreased using the raise and lower push-button in the calibrate mode. The rate of change increases as the switch is held, allowing precise calibration or rapid gross changes.

Memory Retention

All setup and calibration data is preserved in non-volatile memory. Either unit (or both units) may be powered down for up to ten years without having to repeat setup or calibration. Any circuit board may be removed and serviced without loss of data. Additionally, the unit powers up with the maintenance mode in the position last selected. This allows normal return to remote operation after power failure, yet safety is not compromised should a power outage occur during maintenance.

Accuracy

12-bit plus sign analog to digital conversion and a highly stable reference voltage assures accurate readings over a wide temperature range. Vertical and longitudinal redundancy checks are performed on both data links to assure accuracy many orders of magnitude better than the error rate of the communications channel. Additional redundancy on the studio to transmitter link data prevents execution of erroneous commands.

WARNING: This equipment generates, uses, and can radiate radio frequency energy and if not installed and used in accordance with the instruction manual, may cause interference to radio communications. It has been tested and found to comply with the limits for a Class A computing device pursuant to Subpart J of Part 15 of FCC Rules, which are designed to provide reasonable protection against such interference when operated in a commercial environment. Operation of this equipment in a residential area is likely to cause interference in which case the user at his own expense will be required to take whatever measures may be required to correct the interference.

Specifications

Description

Microprocessor based transmitter remote control system. Studio and Transmitter units are physically identical.

Analog Inputs

8 inputs ± 4.5 v.d.c maximum referenced to ground

Status Inputs

8 inputs 5-28 v.d.c. or switch closure

Control Outputs

16 open collector outputs (8 raise, 8 lower) will sink 250 ma., 28v max. Each output has over-current protection.

Failsafe and Alarm Outputs

Open collector failsafe output activated 45 seconds after detection of studio to transmitter link failure. Link alarm o.c. outputs activated when either link fails for more than one second.

Controls

Front panel selection of mode (normal, maint, setup, calib) and channel plus ON/RAISE and OFF/LOWER.

Calibration

Each channel is calibrated by using the raise and lower keys to adjust the reading to the proper value. The speed of the change in value is proportional, permitting ± 1 digit adjustment or rapid gross changes.

Communications Link

One Bell 3002 or equivalent 2-wire circuit or STL subcarrier (command) and FM subcarrier (telemetry).

Modem boards are installed for the class of service requested. Boards will be exchanged at customer request for a nominal handling charge.

Modem Characteristics

Wire modems: 600 Ω balanced, 0 dBm out, -30 dBm min. in

Radio modems: 2200 Ω unbalanced, 1.5 v p-p out, 0.25 v p-p min. in; FM on selected subcarrier between 26 kHz and 185 kHz.

Modulation

FSK 1070 Hz and 1270 Hz transmitter to studio, 2025 Hz and 2225 Hz studio to transmitter

Data Rate

300 b.p.s. full duplex with error detection

Display

5-digit LED dot matrix array for channel and value plus 8 status LED's and 3 mode indicators. Values from -999 to +9999 are displayed with decimal point appropriate for each channel (defined by user).

Update Rate

Less than 400 ms for status and analog value (Reading appears immediately when channel is selected due to continuous scan. Updates then occur at the rate of 3 per second.)

A/D Converter

12-bit dual slope integration with auto-zero.

Measurement accuracy

Better than 0.1 percent for 4 v. input Better than 0.5% at min. 0.25 v. input.

Temperature stability

5 ppm/°C from 0°C to +50°C

Memory retention

Non-volatile storage of calibration constants and all setup information for ten years without power

External connections

Analog and status inputs:	DB-37P submin. D conn.
Control outputs:	DB-37S submin. D conn.
Link (radio)	BNC
Link (wire)	Barrier strip
AC power	IEC power cord

Power requirements

117 v.a.c. nominal; 50/60 Hz; 30 watts
May be strapped for 230v. Toroidal power transformer allows operation from UPS or inverter.

Physical

1 3/4" H x 19" W x 11" D
EIA standard rack mounting

Options

Interface panel: Provides Form A relay contacts brought to barrier strips for control and failsafe outputs. Status and metering inputs are also brought to barrier strips.

Computer Interface: Allows interconnection of one of several popular personal computers for CRT display, limits monitoring, logging, and automatic transmitter switching and mode changes.

TC-8

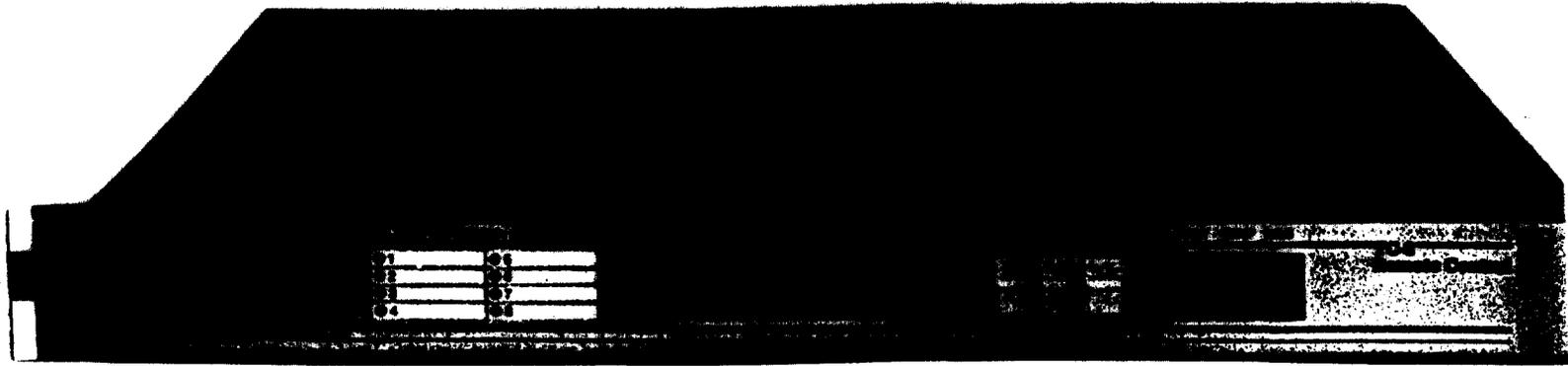


figure 1-1.

Warranty

Burk Technology, Inc. warrants the TC-8 remote control system to be free of defects in materials and workmanship for a period of 24 months from the date of purchase. Equipment will be repaired or replaced at the option of Burk Technology and returned freight prepaid to the customer. Damage due to abuse or improper operation or installation of the equipment or caused by fire or flood or harsh environment is not to be covered by this warranty. Damage in shipping is not the responsibility of Burk Technology. A return authorization must be obtained before returning any equipment. Materials returned under this warranty must be shipped freight prepaid and insured in the original shipping carton or suitable substitute to Burk Technology, Inc., 7 Beaver Brook Road, Littleton, MA 01460. Repairs not covered under this warranty will be made at prevailing shop rates established by Burk Technology.

THE WARRANTY SET FORTH ABOVE IS IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. BURK TECHNOLOGY SHALL NOT BE LIABLE TO ANY PARTY FOR ANY INCIDENTAL, SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES ARISING FROM THE USE OF THIS EQUIPMENT.

SECTION TWO

OPERATION

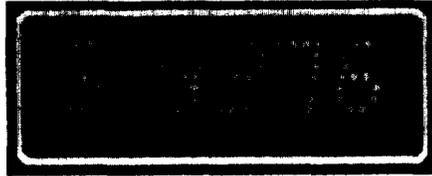
Operation of the TC-8 is straight forward. Figures 2-1 and 2-2 outline the functions of each control and indicator. The studio unit functions only in the "normal" mode, hence instructions for non-technical operators are very simple. Note that the maintenance, setup, and calibrate switches on the studio unit serve only as indicators at the studio. Only the channel select and raise and lower switches are used by the operator.

Analog Display

The four-digit display indicates the value read for the selected channel. The decimal point for each channel is programmed at the transmitter unit. A flashing display on the studio unit indicates that the value is not current due to a link loss from the transmitter.

A display of four dashes (----) indicates that the sample on that channel is greater than the maximum value allowed. This may be due to the raw sample exceeding the converter limits (about 4.5 volts) or due to the calculated value exceeding the display limits (9999).

Displays



The large dot matrix array provides a highly readable display. The channel number is followed by an analog value from -999 to +9999. The decimal point for each channel may be set from the front panel using the setup. feature. All channels are scanned continuously, allowing the studio unit to display the last value of any channel prior to a link loss or power failure at the transmitter.

STATUS

• 1	• 5
• 2	• 6
• 3	• 7
• 4	• 8

The status display provides on/off indications for eight inputs at the transmitter site. Polarity (normally on or normally off) may be set for each input during setup. A white legend area is provided to identify each status input.

figure 2-1.