

Statement of Paul Dean Ford (continued)..

three(3) quadrangles with 20 foot intervals. Some of their data would be +/- 10 feet while other data would be +/- 20 feet. Additional error would occur from measurement of contour distances from the tower and planimeter accuracy of area under the curve on plotted data. The Lohnes and Culver data properly would be 618 feet +/- ten or more feet, remembering that they used three(3) 20 foot interval quadrangles and allowing for measurement error and planimeter error. Since they came up with a figure of 618 feet +/- 10 or more feet, the originally filed data of 609.7 feet can be considered accurate, even using their data.

Lohnes and Culver quote Mr. Smith and state that the antenna top and bottom elements were surveyed precisely at 1633.3 feet and 1526.8 feet respectively AMSL. Considering again that one benchmark was used and that accuracy is claimed to within 1.2 inches, this figure is questionable. The top figure is close to our 1,633.7 feet AMSL but his 1,526.8 feet AMSL is in considerable error with our 1546.5 feet AMSL for the bottom bay. He apparently measured to something that he thought was the bottom of the antenna instead of the

Statement of Paul Dean Ford (continued)..

actual lower antenna bay. Mr. Smith did not tell us the triangulation methods used by him to make this determination and the possible error in his methods. An instrument might have an error of from one-fourth (1/4) inch to (3/16) inch at 100 or 150 feet. Assuming that Mr. Smith was at some distance from the tower and measured the elevation angle to get these figures he might also have an error of anything from +/- 5 to 10 seconds or even up to +/- 1 minute elevation angle. Based upon the affidavit supplied by Bill Evans, the survey was taken with fog in the area. Additional errors are possible due to parallax error. His error in antenna elevation could be significant. In lieu of an explanation of his precise procedure and the error inherent, the data is questionable.

The only correct way to measure the antenna is to have a tower person climb the tower and actually measure it, which Tim Harrington did. In fact, the tower has been measured to be 963 feet above ground level to the top. See statement of Tim Harrington. Because of strobe lighting, the top antenna bay is located six(6) feet and three(3) inches below

Statement of Paul Dean Ford (continued)..

the top of the tower at 956 feet and 9 inches above ground. That is 956.75 feet AGL. The distance between antenna bays has been certified by the antenna manufacturer to be 116.164 inches between centers. The length of the antenna would be  $9 \times 116.164$  inches = 1045.476 inches which is 87.123 feet. The Center of Radiation would be located  $87.123/2$  feet or 43.562 feet (manufacturer's accuracy) below the top ring. This places the center of radiation at 913.2 feet above ground level. Assuming a ground level of 676.9 feet AMSL, the Center of Radiation would be at 1590.1 feet AMSL. If WGGC's average terrain data of 609.7 feet is used, the HAAT is  $1590.1 - 609.7 = 980.4$  feet or 298.8 meters, which rounds to 299 meters.

Keith Reising has run 72 radials of 30" terrain data from the WGGC licensed site and achieved an average terrain of 605.8 feet. This value would be more nearly correct than the original eight (8) radials by Paul Dean Ford. Using the Reising data and Smith's ground elevation of 676.9 feet above mean sea level, the center of radiation is 1,590.1

Statement of Paul Dean Ford (continued)..

feet above mean sea level.  $1,590.1 \text{ feet} - 605.8 \text{ feet} = 984.3 \text{ feet}$  antenna HAAT which is  $300.0 \text{ meters}$  HAAT.

If the original ground elevation of  $680 \text{ feet}$  is used, the Center of Radiation is  $913.2 \text{ feet} + 680 \text{ feet} = 1593.2 \text{ feet}$ . Using the average terrain of  $609.7 \text{ feet}$ , the HAAT is  $1593.2 - 609.7 = 983.5 \text{ feet}$  or  $299.8 \text{ meters}$  which rounds to  $300 \text{ meters}$ .

Even if the Lohnes and Culver average terrain data of  $618.45 \text{ feet}$  is used, the HAAT is  $1593.2 - 618.5 = 974.7 \text{ feet}$  or  $297.1 \text{ meters}$ , which would round to  $297 \text{ meters}$ .

The Commission's adoption of Section 73.1690 of the Rules gives WGGC additional protection against these unwarranted challenges to its status as a Full Class C station. This rule allows the antenna radiation center to be  $+ 2 \text{ meters}$  or  $- 4 \text{ meters}$  from its authorized height and still maintain its licensed status.

Statement of Paul Dean Ford (continued)..

It is believed that WGGC is actually operating as a full Class C station with 100kW. ERP from 300 meters HAAT.

#### SUMMARY

The preference given to hand derived terrain data was intended to be applicable only at the time of filing or for settlement of disputes regarding coverage in a hearing situation. If hand derived data is always preferred over computer generated data then an existing station can never be sure of its condition absent checking terrain by hand. Apparently, the Commission allowed the use of computer data to speed up the processing of applications. If hand data is always preferred, throughout the life of a facility, then we might as well disallow further use of computer data. Think of the congestion at the Commission if every station that is just above minimum height were suddenly challenged by hand derived topographic data. We must not go back to the dark ages. Computer data must be allowed in the application process and challenges permitted only at that time. Once a

Statement of Paul Dean Ford (continued)..

CP has been granted, the permittee or licensee must not be subject to a challenge on the basis of hand generated data.

The proposal that WGGC be downgraded must be dismissed. The proponent has failed to prove that WGGC is operating at less than Class C conditions.

The survey has failed to firmly establish elevation because of the use of only one old benchmark over two(2) kilometers away and because of the claim of excessive accuracy in elevation of the site as well as height of antenna elements. His item (6.) gives elevation at bottom of antenna: 1,526.8 (feet?). He may have measured to something other than the bottom antenna ring. His calculated length of antenna is in error by almost 20 feet. His 106.5 feet - actual 87.1 feet = 19.4 feet error. The determination of tower coordinates may be in error because of failure to properly identify local landmarks.

Lohnes and Culver have given their hand derived topographic data and accuracy of +/- 0.12 inch, failing to consider the

Statement of Paul Dean Ford (continued)..

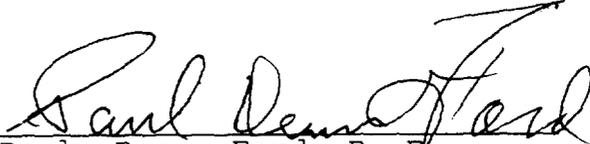
10 foot and 20 foot terrain interval maps used as well as the error in their measurement of distances to contours and planimeter error.

The data presented against WGGC appears to be questionable. The burden of proof has not been fulfilled and the proposal that WGGC be downgraded must be denied.

Finally, it must be stated that Paul Dean Ford has personally known the Sadler family for years. He met the late Clovis Sadler when WKAY (AM) applied for an increase from 250 watts to 1000 watts daytime and 250 watts night on 1490kHz. Later he did many engineering projects for the Sadlers at WKAY and WGGC.

Severe financial sacrifices were made by the Sadler family to build the new facility and Clovis Sadler really gave his life for this project. It would be a terrible insult to this great pioneer Kentucky broadcaster to now wrest this full class C facility, for which he took great pride in knowing he had one of the few class C stations in the area.

Submitted this 15<sup>th</sup> day of October, 1997 by

  
Paul Dean Ford, P. E.

WGGC

36-54-43

86-11-21

Average of 0	radial:	623.5 ft.	(190.0 m.)	AMSL.
Average of 5	radial:	637.5 ft.	(194.3 m.)	AMSL.
Average of 10	radial:	626.3 ft.	(190.9 m.)	AMSL.
Average of 15	radial:	630.7 ft.	(192.3 m.)	AMSL.
Average of 20	radial:	631.7 ft.	(192.5 m.)	AMSL.
Average of 25	radial:	645.7 ft.	(196.8 m.)	AMSL.
Average of 30	radial:	657.5 ft.	(200.4 m.)	AMSL.
Average of 35	radial:	663.2 ft.	(202.2 m.)	AMSL.
Average of 40	radial:	671.9 ft.	(204.8 m.)	AMSL.
Average of 45	radial:	662.8 ft.	(202.0 m.)	AMSL.
Average of 50	radial:	652.4 ft.	(198.9 m.)	AMSL.
Average of 55	radial:	654.7 ft.	(199.6 m.)	AMSL.
Average of 60	radial:	635.4 ft.	(193.7 m.)	AMSL.
Average of 65	radial:	624.2 ft.	(190.3 m.)	AMSL.
Average of 70	radial:	607.7 ft.	(185.2 m.)	AMSL.
Average of 75	radial:	600.5 ft.	(183.0 m.)	AMSL.
Average of 80	radial:	592.2 ft.	(180.5 m.)	AMSL.
Average of 85	radial:	585.0 ft.	(178.3 m.)	AMSL.
Average of 90	radial:	567.7 ft.	(173.0 m.)	AMSL.
Average of 95	radial:	570.5 ft.	(173.9 m.)	AMSL.
Average of 100	radial:	577.7 ft.	(176.1 m.)	AMSL.
Average of 105	radial:	566.1 ft.	(172.5 m.)	AMSL.
Average of 110	radial:	548.4 ft.	(167.1 m.)	AMSL.
Average of 115	radial:	560.4 ft.	(170.8 m.)	AMSL.
Average of 120	radial:	574.2 ft.	(175.0 m.)	AMSL.
Average of 125	radial:	568.7 ft.	(173.3 m.)	AMSL.
Average of 130	radial:	601.2 ft.	(183.3 m.)	AMSL.
Average of 135	radial:	630.2 ft.	(192.1 m.)	AMSL.
Average of 140	radial:	646.9 ft.	(197.2 m.)	AMSL.
Average of 145	radial:	628.3 ft.	(191.5 m.)	AMSL.
Average of 150	radial:	649.5 ft.	(198.0 m.)	AMSL.
Average of 155	radial:	658.4 ft.	(200.7 m.)	AMSL.
Average of 160	radial:	650.9 ft.	(198.4 m.)	AMSL.
Average of 165	radial:	685.9 ft.	(209.1 m.)	AMSL.
Average of 170	radial:	695.6 ft.	(212.0 m.)	AMSL.
Average of 175	radial:	688.9 ft.	(210.0 m.)	AMSL.
Average of 180	radial:	673.6 ft.	(205.3 m.)	AMSL.
Average of 185	radial:	649.3 ft.	(197.9 m.)	AMSL.
Average of 190	radial:	651.5 ft.	(198.6 m.)	AMSL.
Average of 195	radial:	655.5 ft.	(199.8 m.)	AMSL.
Average of 200	radial:	662.1 ft.	(201.8 m.)	AMSL.
Average of 205	radial:	670.0 ft.	(204.2 m.)	AMSL.
Average of 210	radial:	647.8 ft.	(197.4 m.)	AMSL.
Average of 215	radial:	639.6 ft.	(194.9 m.)	AMSL.
Average of 220	radial:	621.5 ft.	(189.4 m.)	AMSL.
Average of 225	radial:	593.0 ft.	(180.7 m.)	AMSL.
Average of 230	radial:	576.7 ft.	(175.8 m.)	AMSL.
Average of 235	radial:	567.7 ft.	(173.0 m.)	AMSL.
Average of 240	radial:	585.5 ft.	(178.5 m.)	AMSL.
Average of 245	radial:	579.0 ft.	(176.5 m.)	AMSL.
Average of 250	radial:	563.7 ft.	(171.8 m.)	AMSL.
Average of 255	radial:	569.5 ft.	(173.6 m.)	AMSL.
Average of 260	radial:	573.1 ft.	(174.7 m.)	AMSL.
Average of 265	radial:	565.7 ft.	(172.4 m.)	AMSL.
Average of 270	radial:	568.5 ft.	(173.3 m.)	AMSL.
Average of 275	radial:	564.5 ft.	(172.1 m.)	AMSL.
Average of 280	radial:	560.2 ft.	(170.7 m.)	AMSL.
Average of 285	radial:	538.8 ft.	(164.2 m.)	AMSL.
Average of 290	radial:	530.5 ft.	(161.7 m.)	AMSL.
Average of 295	radial:	514.9 ft.	(157.0 m.)	AMSL.

Average of 300°	radial:	515.3 ft.	(157.1 m.)	AMSL.
Average of 305°	radial:	530.3 ft.	(161.6 m.)	AMSL.
Average of 310°	radial:	541.7 ft.	(165.1 m.)	AMSL.
Average of 315°	radial:	548.0 ft.	(167.0 m.)	AMSL.
Average of 320°	radial:	555.3 ft.	(169.2 m.)	AMSL.
Average of 325°	radial:	566.0 ft.	(172.5 m.)	AMSL.
Average of 330°	radial:	578.9 ft.	(176.4 m.)	AMSL.
Average of 335°	radial:	587.6 ft.	(179.1 m.)	AMSL.
Average of 340°	radial:	586.3 ft.	(178.7 m.)	AMSL.
Average of 345°	radial:	590.3 ft.	(179.9 m.)	AMSL.
Average of 350°	radial:	606.7 ft.	(184.9 m.)	AMSL.
Average of 355°	radial:	615.4 ft.	(187.6 m.)	AMSL.

Terrain averaging study in meters at N. 36 54 43, W. 86 11 21. WGGC

Average terrain height: 605.8 feet, or 184.6 meters.

Statement of Keith Reising

Keith Reising has run 72 radials of 30" terrain data and achieved an average terrain of 605.8 feet.

Signed:

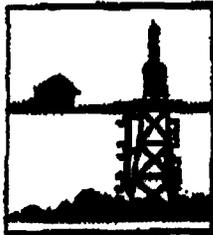


Oct. 16, 1997

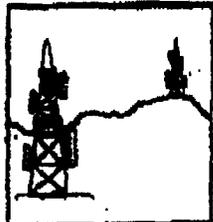
# **STATEMENT OF ANTENNA MANUFACTURER**

# RADIO FREQUENCY SYSTEMS

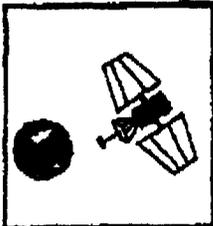
## RFS Cablewave



Broadcast Antenna Systems



Microwave Antenna Systems



Government Systems



HF Antenna Systems



Radio Frequency Cabinet Systems

ISO 9001



Certificate No. 9344

FACSIMILE TRANSMISSION

DATE: 7/22/97

TO: MR. BILL EVANS

COMPANY: WKAY-FM 95.1 MHz

COUNTRY: USA

FAX NO.: 502-651-2141

FROM: Robert Scott

ENGINEERING DEPARTMENT FAX (203) 238-5524

Total number of pages, including cover sheet: 2

SUBJECT: Element Spacing.

Your element spacing was verified on drawing No. L-50184 to be 116.164" for your CFM 4P-10.

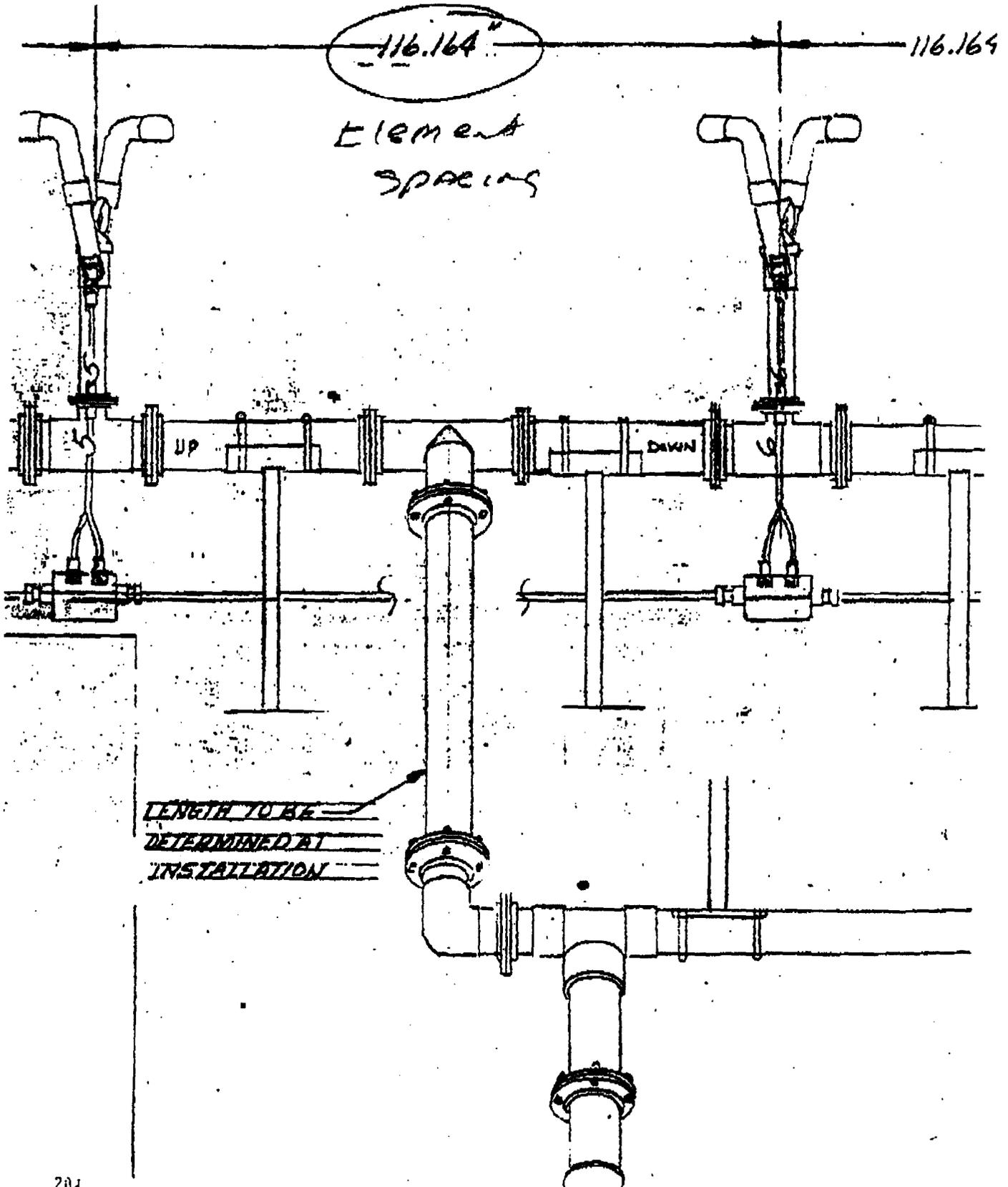
See enclosed drawing

Tel: (203) 238-8311  
Fax: (203) 238-8788  
Sales Fax: (203) 234-7718  
Mfg. Fax: (203) 234-8258

RFS Cablewave Systems  
Div. Radio Frequency Systems, Inc.  
60 Dodge Avenue, North Haven, CT 06473  
(USA)

OR DAMAGE WILL OCCUR.

-A



**STATEMENT OF ANTENNA INSTALLATION  
COMPANY**

**CTI INSTALLATIONS**

**2855 Hwy 261 Newburgh, Indiana 47630**

**Phone: 812-858-2554 Fax: 812-853-6652**

**TO: Bill Evans**

**RE: Glasgow, Kentucky Tower**

**FAX NUMBER: (502) 737-7229**

**FROM: Ray R. Ryan**

**NOTE:**

**In regards to the Glasgow, Kentucky tower, to the best of my knowledge we have installed the FM antenna correctly, according to the authorization.**

**10/13/97**

  
**Ray R. Ryan**

# **STATEMENT OF TOWER CLIMBER**

To Whom It May Concern:

Re: WGGC, Glasgow, Kentucky Tower Measurements.

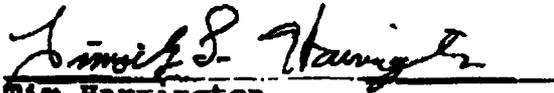
On Sunday Morning, October 12, 1997, I climbed the WGGC Tower, located near Meador, Kentucky, to determine certain measurements. I used a tape measure to obtain the data.

Here are the results:

1. The height of the tower with lightning rod is 956 feet AGL.
2. The height of the tower without the lightning rod is 963 feet AGL.
3. The center of the top antenna bay is located 6 feet 3 inches below the top of the tower without the lightning rod, or at 956 feet 9 inches.

The measurements are true, complete and correct to the best of my knowledge and belief and are made in good faith.

10/13/97

  
Tim Harrington

To Whom It May Concern:

Re: WGGC, Glasgow, Kentucky Tower Measurements.

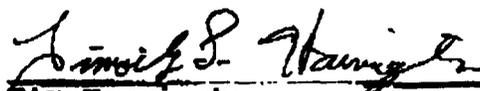
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The measurements are true, complete and correct to the best of my knowledge and belief and are made in good faith.

10/13/97

  
Tim Harrington



VINCENT A. PEPPER  
ROBERT F. CORAZZINI  
PETER GUTMANN  
JOHN F. GARZIGLIA  
NEAL J. FRIEDMAN  
ELLEN S. MANDELL  
HOWARD J. BARR  
MICHAEL J. LEHMKUHL \*  
SUZANNE C. SPINK \*  
MICHAEL H. SHACTER  
KEVIN L. SIEBERT \*  
PATRICIA M. CHUH

\* NOT ADMITTED IN D.C.

PEPPER & CORAZZINI  
L. L. P.

ATTORNEYS AT LAW  
1776 K STREET, NORTHWEST, SUITE 200  
WASHINGTON, D. C. 20006  
(202) 296-0600

2-2015 4920  
**FILE COPY**

GREGORY S. HALL  
E. THEODORE HALLYCK  
OF COUNSEL  
FREDERICK W. FORD  
1908-1988

TELECOPIER (202) 296-5572  
INTERNET PEPCOR@COMMLAW.COM  
WEB SITE HTTP://WWW.COMMLAW.COM

September 16, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: **Section 1.41 Request for Commission  
Action to Downgrade the Facilities of  
WGGC(FM), Glasgow, Kentucky to  
Reflect its Actual Height**

Dear Mr. Caton:

Thunderbolt Broadcasting Company, the licensee of WCDZ(FM), Dresden, Tennessee, by its attorneys, hereby requests Commission action to downgrade the FM classification of WGGC(FM), Glasgow, Kentucky in Section 73.202(b) of the Commission's rules to reflect its actual facilities. This request is being submitted pursuant to Section 1.41 of the Commission's rules which states that requests for action may be submitted informally except where formal procedures are required.

Section 73.202(b) of the Commission's rules has allocated Channel 236C to Glasgow, Kentucky. WGGC(FM) is licensed by the Commission to operate on Channel 236C at Glasgow, Kentucky. Section 73.211(b) of the Commission's rules requires for a Class C station that an antenna height above average terrain be a minimum of 300 meters, which is 984.24 feet. As shown in the attached, however, WGGC(FM) presently operates with an antenna height above average terrain of 961.6 feet. Therefore, the WGGC(FM) antenna center of radiation is some 23 feet below what is required for minimum Class C facilities. A number of years back, the Commission required all Class C stations to operate with a minimum of 300 meters antenna height above average terrain, or be downgraded to a lesser classification of facility. See Modification of FM Broadcast Station Rules to Increase the Availability of Commercial FM Broadcast Assignments, 97 FCC 2d 279 (1984).

Thunderbolt Broadcasting Company requests the immediate action of the Commission to downgrade WGGC(FM) to a Class C1 facility since WGGC(FM) operates with an antenna height above

Mr. William F. Caton  
September 16, 1997  
Page 2

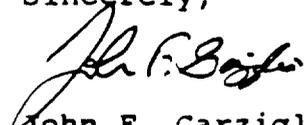
average terrain of 961.6 feet. Under its present operation with an antenna height above average terrain of 961.6 feet and a power output of 100 kilowatts, the reclassification of WGGC(FM) in the FM Table of Allotments as a Class C1 facility is appropriate pursuant to Section 73.211 of the Commission's rules, as it fails to meet the minimum antenna height above average terrain requirements for a Class C station specified in Section 73.211(a)(2) of the Commission's rules.

Thunderbolt Broadcasting Company has a direct interest in the classification of WGGC(FM). The classification of WGGC(FM) as a Class C facility is prohibiting the grant of an application filed by Thunderbolt Broadcasting Company seeking an upgrade for WCDZ(FM) to Class C3 facilities (FCC File No. BPH-951120IE). By operating with Class C1 facilities, but being classified as a Class C station, WGGC(FM) is engaging in an inefficient utilization of spectrum and should be required to immediately downgrade. See generally Crain Broadcasting, Inc., 8 FCC Rcd 4406 (1993).

If requested by the Commission, Thunderbolt Broadcasting Company would be pleased to submit under oath the testimony or the declaration of its consulting engineer whose engineering statement is attached showing that WGGC(FM) is now operating with Class C1 facilities while being classified as a Class C station.

Should any questions arise concerning this request, please contact this office directly.

Sincerely,

  
John F. Garziglia

Enclosure

cc: Heritage Communications, Inc., licensee of WGGC(FM), Glasgow, Kentucky  
Mr. Roy J. Stewart (via hand delivery)  
Mr. Dennis Williams (via hand delivery)

bcc: Mr. Paul F. Tinkle  
Mr. Robert D. Culver

**REQUEST FOR DOWNGRADE OF  
WGGC(FM), GLASGOW, KENTUCKY**

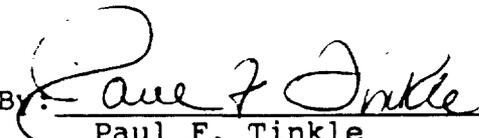
Thunderbolt Broadcasting Company respectfully requests Commission action to downgrade WGGC(FM), Glasgow, Kentucky to a Class C1 facility.

As shown in the attached Engineering Statement of Lohnes & Culver, Consulting Radio Engineers, WGGC(FM) operates with an antenna height above average terrain of 961.6 feet. Section 73.211(b) of the Commission's rules requires that an antenna height above average terrain for Class C stations be a minimum of 300 meters (984.24 feet). Thus, the WGGC(FM) antenna center of radiation is some 23 feet below what is required for minimum Class C facilities.

Thunderbolt Broadcasting Company requests immediate Commission action regarding this situation. The operation of WGGC(FM) with Class C1 facilities, while being classified as a Class C station, is prohibiting the grant of an application filed by Thunderbolt Broadcasting Company seeking an upgrade for WCDZ(FM) to Class C3 facilities. WGGC(FM) is engaging in an inefficient utilization of spectrum and should be required to immediately downgrade. See generally Crain Broadcasting, Inc., 8 FCC Rcd 4406 (1993) (station operating with below minimum height facilities denied classification as a Class C facility when antenna height above average terrain was below the minimum for Class C facilities).

Respectfully submitted,

**THUNDERBOLT BROADCASTING COMPANY**

By:   
Paul F. Tinkle  
President

**EXHIBIT E (SUPPLEMENTAL)  
ENGINEERING STATEMENT RE:  
APPLICATION FOR  
CONSTRUCTION PERMIT  
FCC FILE BPH-951120IE  
WCDZ(FM) 25.0kW 100M AAT CH.236C3  
DRESDEN, TENNESSEE**

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REVISED ALLOCATION STUDY	PAGE 3
APPLICATION MODIFICATION	PAGE 4
CONCLUSION	PAGE 4

**FIGURES**

LAND SURVEY REPORT	FIGURE 1
ALLOCATION STUDY - ALLOTMENT SITE	FIGURE 2

Prepared by  
Lohnes and Culver Washington, D.C.  
September, 1997

**EXHIBIT E (SUPPLEMENTAL)  
ENGINEERING STATEMENT RE:  
APPLICATION FOR CONSTRUCTION PERMIT  
FCC FILE BPH-951120IE  
WCDZ(FM) 25.0kW 100M AAT CH.236C3  
DRESDEN, TENNESSEE**

**INTRODUCTION**

This engineering statement was prepared on behalf of Thunderbolt Broadcasting Company (Thunderbolt), licensee of FM Broadcast Station WCDZ(FM) and permittee as indicated above. It supplies technical information regarding that application and the waiver requests made therein.

The referenced application requested a waiver of Section 73.203 of the Rules of the Federal Communications Commission (FCC Rules). This statement supplies information negating the need for that waiver. All calculations, contours, and other technical data contained in or attached to this statement have been determined in accordance with the current FCC Rules.

**SECTION 73.203 WAIVER REQUEST - BACKGROUND**

WCDZ(FM), presently Channel 236A, is situated and proposes to continue to use its site which, as a Class C3 operation, is short spaced to the west to Station WTRB-FM, Channel 235A at Ripley, TN. and to the east to Station WGGC(FM), Channel 236C at Glasgow, KY. Furthermore, there is no area at or near the present site which meets the separation requirements of Section 73.207 of the FCC Rules. The existence of such an area is a threshold condition for the application of Section 73.215 contour protection and the use of an otherwise short spaced site. As a Class A station, the short spacing to Station WTRB-FM cannot be reduced, other than by moving away from that transmitter site and such a relocation would move directly toward WGGC(FM)

and worsen the short spacing in that direction. The short spacing with WGGC(FM) can be removed by changing the class of that station from Class C to Class C1. In that event an area meeting the Section 73.207 separation requirements opens to the east of WCDZ(FM) and the threshold for Section 73.215 processing is met.

## **WGGC(FM) FACILITIES INVESTIGATION**

WGGC(FM) operates with a reported ERP of 100 kW at a reported antenna height of 988 feet (301 meters) Above Average Terrain (AAT) and 1598 feet Above Mean Sea Level (AMSL). The reported antenna height is one (1) meter above the minimum for Class C operation. The WGGC(FM) structure and antenna heights, as reported, have been found in agreement in both FCC and aeronautical (Kentucky Airport Zoning Commission) documents to be; structure top, 966 feet (294.4 M) Above Ground Level AGL and 1646 feet (501.7 M) AMSL, antenna center 1598 feet (487 M) AMSL and 988 feet (301 M) AAT. This yields an average terrain height of 610 feet AMSL.

Inspection of the average elevation within 3 to 16 kilometers of the WGGC(FM) transmitter site was conducted by the manual method described in Sections 73.312 and 73.313 of the FCC Rules. Topographic maps as specified in Section 73.312 were obtained and the topographic data was retrieved from those maps and averaged as described in Section 73.313. The resulting precise average terrain is 618.45 feet AMSL, 8.45 feet more than reported to the FCC.

The WGGC(FM) tower was inspected by a registered professional engineer and registered land surveyor to determine various heights of the antenna site, tower structure and FM antenna relative to mean sea level. Attached as Figure 1 is the report of Dennis D. Smith, PE, PLS providing that information. The height of the antenna structure to the top of the lightning rod is 965.6 feet AGL and 1642.5 feet AMSL, both in