

SECTION V-C - TV BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates?  Yes  No  
 If Yes, list old coordinates:

Latitude <u>N/A</u> °	Longitude <u>N/A</u> °
-----------------------	------------------------

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. Not required under part 17

Date N/A Office where filed N/A

Exhibit No. <u>N/A</u>
---------------------------

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Distance (km)	Bearing (degrees True)
Hafer Petroleum(HP)	1.54	334.6
(a) <u>Arnold</u>	<u>2.57</u>	<u>154.4</u>
Penske (HP)	6.04	325.9
(b) <u>Reading Hospital (HP)</u>	<u>6.64</u>	<u>316.2</u>
Reading Hosp. & Medic. (HP)	7.11	313.8

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

(1) of site above mean sea level: 256 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 61 meters

(3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] 317 meters

(b) Height of antenna radiation center: (to the nearest meter)

(1) above ground: 46 meters

(2) above mean sea level [(aX1) + (bX1)]; and 302 meters

(3) above average terrain. 153 meters

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 TV radiator.

Exhibit No. <u>Fig. 1</u>
------------------------------

9. Maximum visual effective radiated power 5000 kW

10. Antenna:

(a) Manufacturer Dielectric (b) Model No. TFU-34E

(c) Is a directional antenna proposed?

Yes  No

If Yes, specify major lobe azimuth(s) N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.686.

Exhibit No.  
N/A

(d) Is electrical beam tilt proposed?

Yes  No

If Yes, specify 0.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.686.

Exhibit No.  
Fig. 2A, 2B  
Stmt. A, 1b1

(e) Is mechanical beam tilt proposed?

Yes  No

If Yes, specify N/A degrees mechanical beam tilt toward azimuth N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.686.

Exhibit No.  
N/A

(f) The proposed antenna is (check only one box)

horizontally polarized  circularly polarized  elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.686(a) and (b)?

Yes  No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service.

Exhibit No.  
N/A

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.686(a)?

Yes  No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1126.

Exhibit No.  
N/A

13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610? (But see Statement B)

Yes  No

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waiver(s).

Exhibit No.  
N/A

14. Are there (a) within 80 meters of the proposed antenna, any proposed or authorized FM or TV transmitters or (b) in the general vicinity, any nonbroadcast (except citizens band or amateur) radio stations or any established commercial or government receiving stations?

Yes  No

If Yes, attach as an Exhibit a description of the 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 intermodulation) to facilities in existence or authorized prior to grant of this application. (See 47 C.F.R. Sections 73.685(d) and (g).)

Exhibit No.  
Stmt. C

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly 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.  
Fig. 3

SECTION V-C - TV BROADCAST ENGINEERING DATA (Page 4)

16. Attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) which shows clearly, legibly and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.  
Fig. 4

- (a) The proposed transmitter location, and the radials along which profile graphs have been prepared;
- (b) The City Grade, Grade A and Grade B predicted contours; and
- (c) The legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km) and population (latest census) within the predicted Grade B contour.

Area 14,925 sq. km. Population 4,066,085 (1990 Census)

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 Grade B contour; and
- (b) The Grade B contour of the licensed main facility for which the applied-for facility will be the auxiliary.

(Main facility license file number N/A)

19. Terrain and Coverage Data. To be calculated in accordance with 47 C.F.R. Section 73.686.1

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

- Linearly interpolated 30-second database (Source: NGDC TPG-0050)
- 75 minute topographic map
- Other (briefly summarize)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A Contour (kilometers)	To the Grade B Contour (kilometers)
340 *	207.4	49.8	58.3	73.3
0	95.6	40.6	49.0	63.3
45	180.2	48.1	56.5	71.0
90	228.0	51.1	59.7	75.1
135	134.4	44.6	52.9	67.2
180	118.3	43.2	51.6	65.8
225	129.3	44.2	52.5	66.8
270	123.0	43.6	52.0	66.2
315	213.5	50.2	58.7	73.9

\*Radial through principal community. If not one of the major radials. This radial should NOT be included in 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 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact?

Yes  No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

Exhibit No.  
N/A

If No, explain briefly why not.

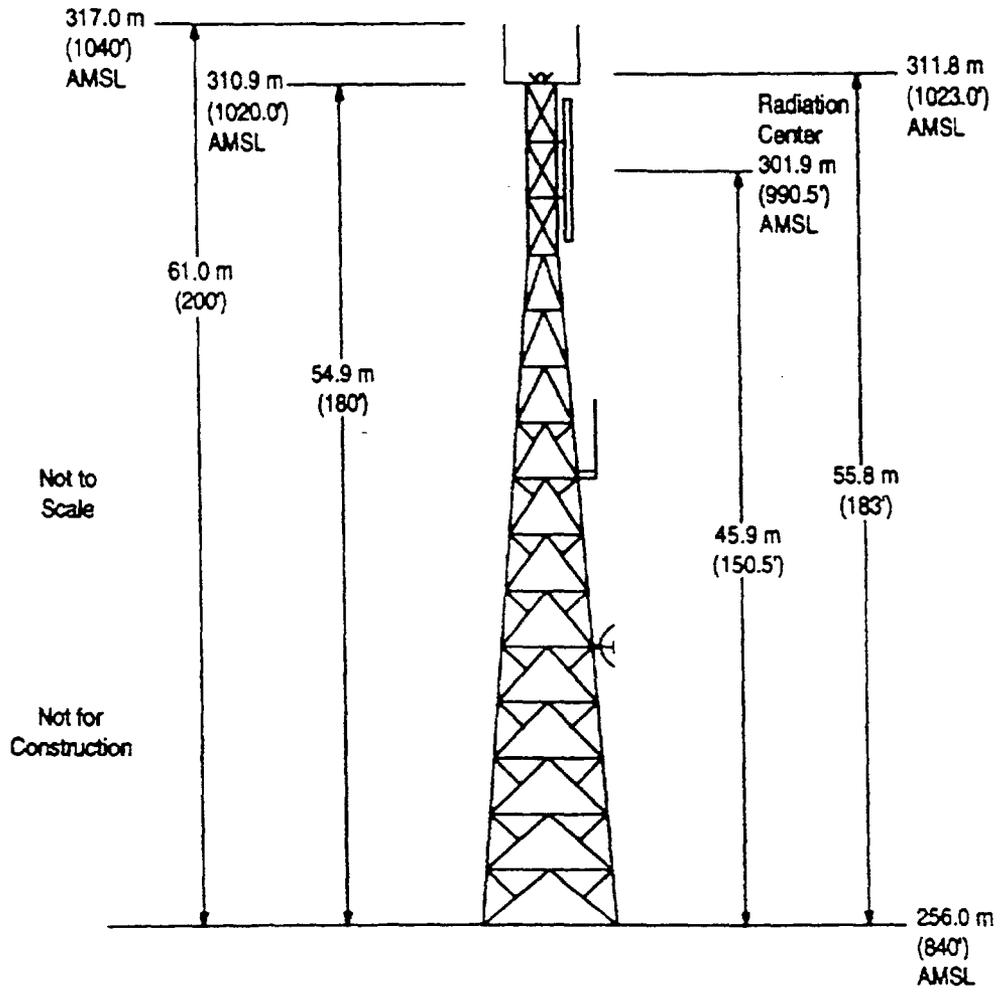
Proposal maybe categorically excluded from environmental processing; See statement D

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) Garrison C. Cavell	Relationship to Applicant (e.g., Consulting Engineer) Consultant
Signature 	Address (Include ZIP Code) Suffa and Cavell, Inc. 10300 Eaton Place, Suite 450 Fairfax, VA 22030
Date June 29, 1994	Telephone No. (Include Area Code) ( 703 ) 591-0110

Site Coordinates  
40° 17' 15" N  
75° 53' 45" W



**FIGURE 1**  
**ANTENNA SYSTEM ELEVATION PLAN**

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prepared June 1994 for  
**Adams Communications Corporation**  
Reading, Pennsylvania

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Ch 51 5000 kW 153 m

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**Suffa and Cavell, Inc.**  
Consulting Engineers - Fairfax, VA

**FCC Original**

**Engineering Exhibit**

**Application for Construction Permit**

prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*

Channel 51 5000 kW 153 m

June 29, 1994

**Suffa & Cavell, Inc.**

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**Consulting Engineers**  
10300 Eaton Place  
Suite 450  
Fairfax, VA 22030  
(703) 591-0110

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**READING EXHIBIT 44  
PAGE 84**

Statement A  
**Proposed Antenna System**  
prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*  
Channel 51 5000 kW 153 m

The described operation will employ a *Dielectric Communications* model TFU-34E antenna which will be non-directional in the horizontal plane. **Figures 2A and 2B** present the theoretical elevation pattern of the proposed antenna system. As shown, 0.5° of electrical beam tilt is being specified. **Table I** provides a tabulation of the elevation pattern relative field at the pertinent depression angle, along with elevation and contour data.

The antenna system will be installed in accordance with the manufacturer's instructions, said installation being supervised on-site by a competent technical representative of the applicant.

# DIELECTRIC



Proposal Number

Date

June 28, 1994

Call Letters

Channel

Location

Customer

Antenna Type

TFU-34E

## ELEVATION PATTERN

RMS Gain at Main Lobe 30.0

14.77 dB

Beam Tilt

0.50 deg

RMS Gain at Horizontal 22.4

13.80 dB

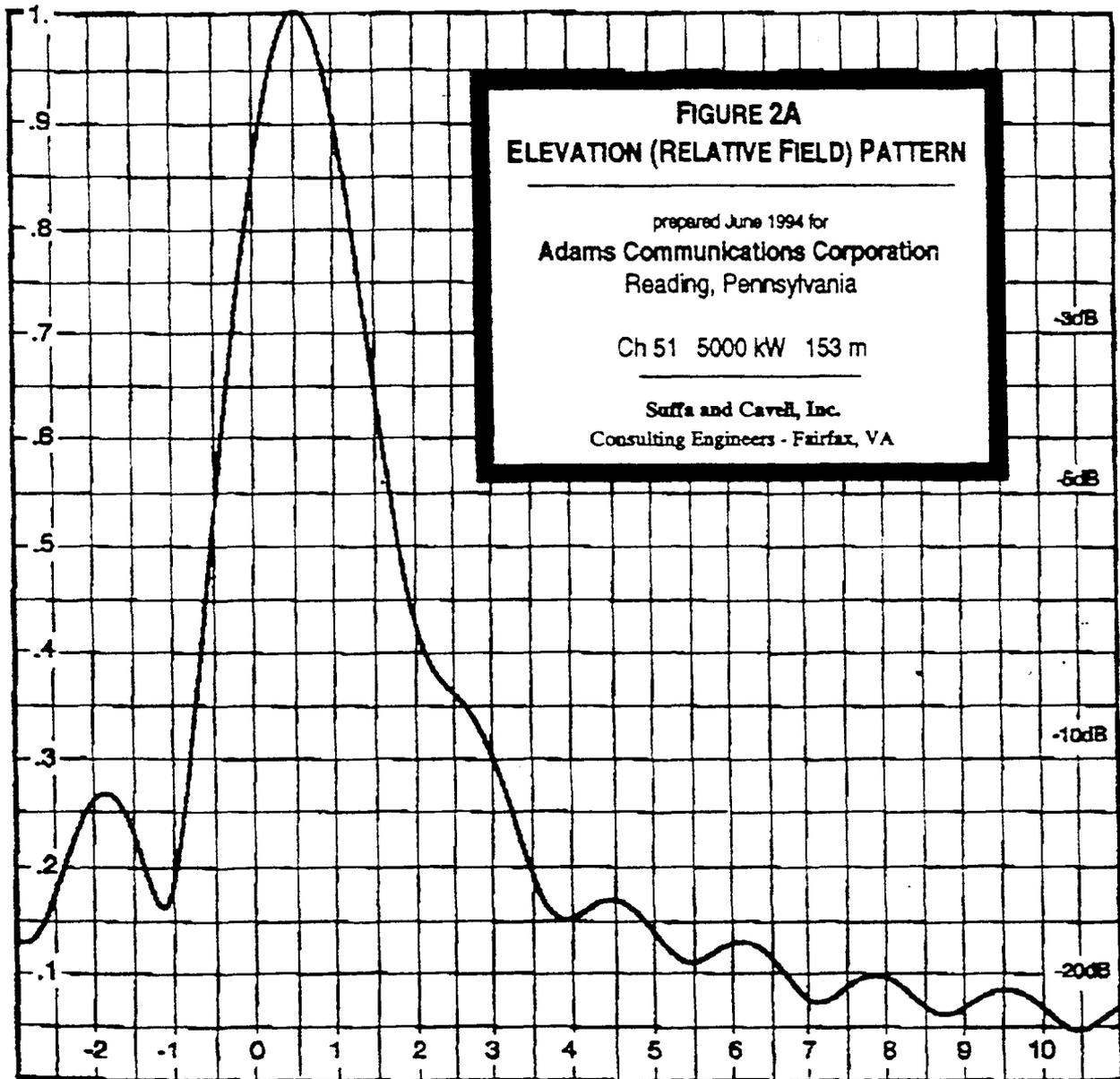
Frequency

Calculated/Measured

Calculated

Drawing #

34E300050-80



DEGREES BELOW HORIZONTAL

DIELECTRIC COMMUNICATIONS

**DIELECTRIC**



Proposal Number

Date

June 28, 1994

Call Letters

Channel

Location

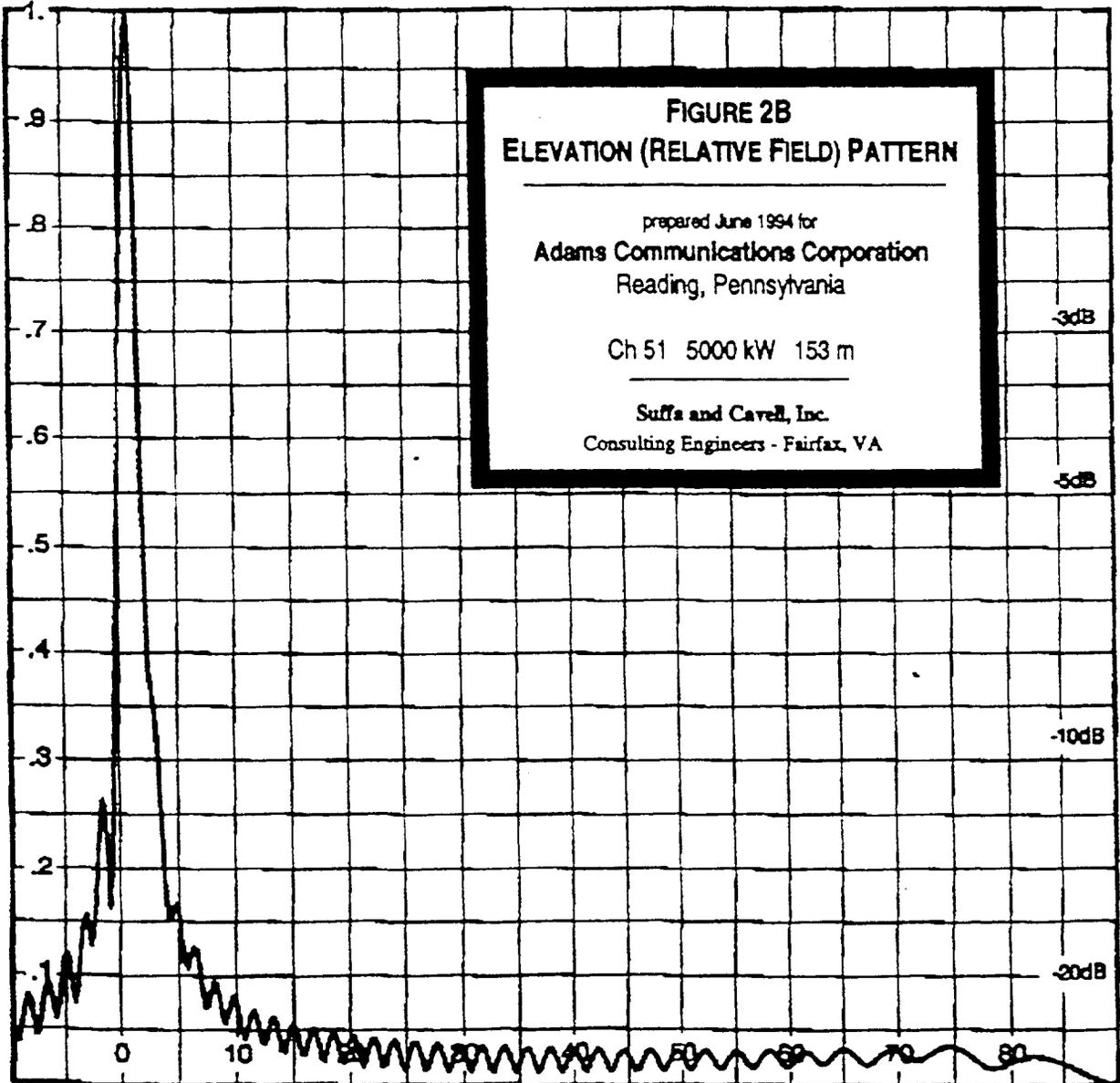
Customer

Antenna Type

TFU-34E

**ELEVATION PATTERN**

RMS Gain at Main Lobe	30.0	14.77 dB	Beam Tilt	0.50 deg
RMS Gain at Horizontal	22.4	13.50 dB	Frequency	
Calculated/Measured	Calculated		Drawing #	34E300050-90



DEGREES BELOW HORIZONTAL

**DIELECTRIC COMMUNICATIONS**

**Table I**  
**Elevation and Contour Data**  
 Adams Communications Corporation  
 Reading, Pennsylvania  
 Channel 51 5000 kW 153 m

Azimuth (degrees T)	Average Elevation (m)	Effective Height (m)	Depression Angle (Deg)	E Plane Rel. Field At Depr. Angle	ERP (kw)	ERP (dBk)	City Grade 80 dBu (km)	Grade A 74 dBu (km)	Grade B 64 dBu (km)
0	206.3	95.6	0.27	0.970	5000	36.99	40.6	49.0	63.3
45	121.7	180.2	0.37	0.992	5000	36.99	48.1	56.5	71.0
90	73.9	228.0	0.42	0.997	5000	36.99	51.1	59.7	75.1
135	167.5	134.4	0.32	0.983	5000	36.99	44.6	52.9	67.2
180	163.6	118.3	0.30	0.976	5000	36.99	43.2	51.6	65.8
225	172.6	129.3	0.31	0.978	5000	36.99	44.2	52.5	66.8
270	178.9	123.0	0.31	0.978	5000	36.99	43.6	52.0	66.2
315	88.4	213.5	0.40	0.994	5000	36.99	50.2	58.7	73.9
340 City	94.5	207.4	0.40	0.994	5000	36.99	49.8	58.3	73.3

Elevation of Average Terrain: 149.1 meters  
 Antenna Height Above Average Terrain: 152.8 meters  
 Antenna Height Above Mean Sea Level: 301.9 meters  
 Effective Radiated Power: 6000 kilowatts

Statement B  
**Allocation Considerations**  
prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*  
Channel 51 5000 kW 153 m

The site specified by *Adams Communications Corporation* ("Adams") meets all of the inter-station separation requirements of Section 73.610 of the FCC Rules with respect to all authorized full service facilities except with respect to the existing operation of WTVE (TV), Reading, Pennsylvania. (WTVE is licensed to Reading Broadcasting, Inc.) Since this application is mutually exclusive with the license renewal of WTVE, that facility need not be considered; a grant of this application, which would simultaneously terminate the license of Reading Broadcasting, Inc., would make the allocation conflict moot.

Two other matters warrant discussion. First, in the Advanced Television proceeding freeze order,<sup>1</sup> the Commission imposed a "freeze" on the acceptance of applications for construction permit for new television stations on vacant allotments within certain areas where the density of existing television stations left relatively limited spectrum available for new technologies. The Reading area is within such a "freeze zone". However, since Channel 51 in Reading, Pennsylvania is presently occupied by WTVE, it is not a "vacant allotment", within the meaning of the Advanced Television (ATV) freeze order. Consequently, the instant application is believed to be acceptable for filing.

It should also be noted in this regard, that the Commission has previously accepted television construction permit applications which were mutually exclusive

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<sup>1</sup> Advanced Television Systems and Their Impact on the Existing Television Service, Order, RM-5811 (Mimeo No. 4074 released July 17, 1987).

Statement B (continued)  
**Allocation Considerations**

with television license renewal applications in the top 30 markets<sup>2</sup>, notwithstanding the ATV freeze. (See e.g. Trinity Broadcasting of Florida, Inc., 8 FCC Rcd 2475 (1993), in which the full Commission designated for hearing the October 1991 application of Trinity Broadcasting of Florida, Inc. for renewal of license of television station WHFT(TV), Miami, Florida, and the competing application (filed December 27, 1991) of Glendale Broadcasting Co. Both applications were filed following the issuance of the Commission's ATV freeze order.)

The proposed site is also "short-spaced" to certain existing or proposed LPTV/TV Translator facilities. However, inasmuch as LPTV/TV Translator stations are classified as "secondary" services, they are not afforded protection from full-service facilities. Specifically, Section 74.702(b) of the FCC Rules states that authorizations for the construction of (or changes in the facilities of existing) full service television stations may be made without regard to existing or proposed LPTV or TV Translator stations. Furthermore, any such "impacted" LPTV operation must take steps to eliminate any interference caused to the full powered station, even if it was caused by the modification of the full service facility. Accordingly, this application may be granted without regard to any "Part 74" operations.

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<sup>2</sup> Reading is part of the Philadelphia ADI (ie: *Allentown-Bethlehem-Philadelphia & Reading, PA; Atlantic City-Vineland-Wildwood, NJ; Wilmington, DE*), which is market "number 4".

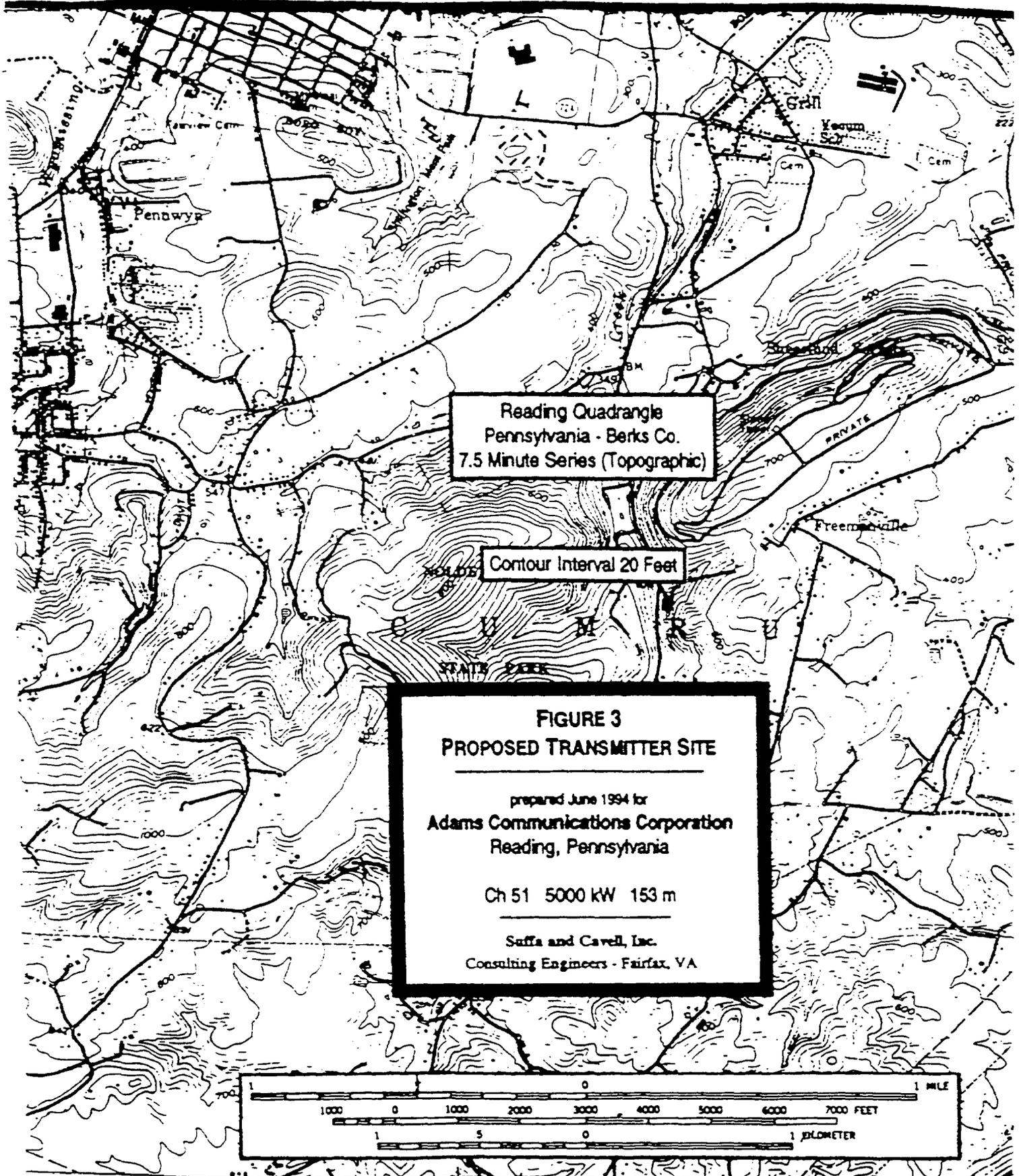
Statement C  
**Interference Considerations**  
prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*  
Channel 51 5000 kW 153 m

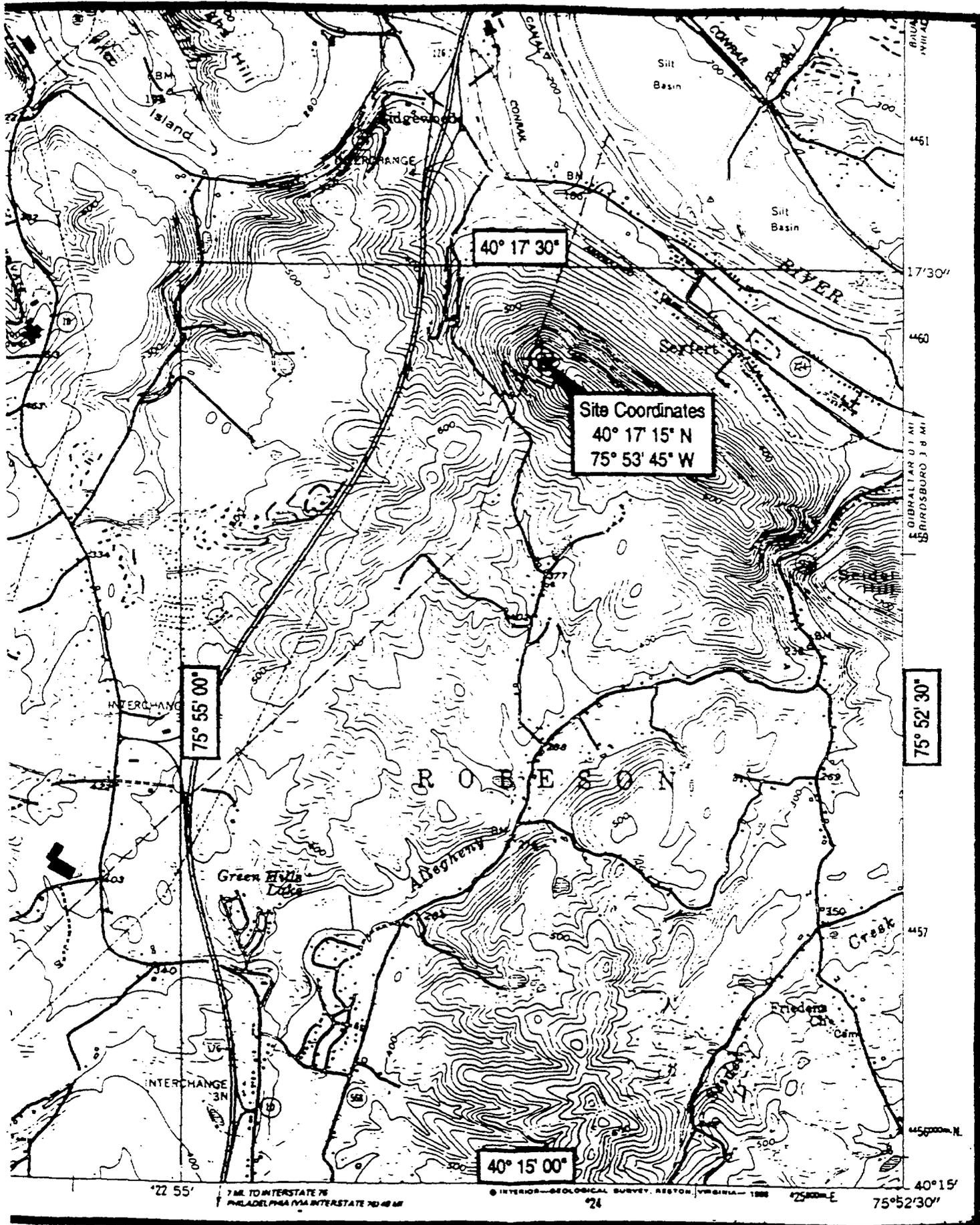
*Adams Communications Corporation* ("*Adams*") is proposing the construction of a new transmitting facility in a relatively unpopulated area . There are no known proposed or authorized FM or TV transmitters located within 60 meters of the selected location. There are several non-broadcast radio stations, established commercial, or government receiving stations within the general vicinity of the proposed site.

The nearest known FCC Monitoring station is 147 km distant at Laurel, Maryland. There are no AM broadcast stations located within 2 miles of the proposed site.

As discussed in the Commission's Rules, present information is not sufficient to establish "blanketing areas" of television broadcast stations. However, since it is also believed that there is little population located around the proposed site, and given the elevation pattern of the proposed antenna system, it is believed that there should be few instances of "blanketing interference" near this site.

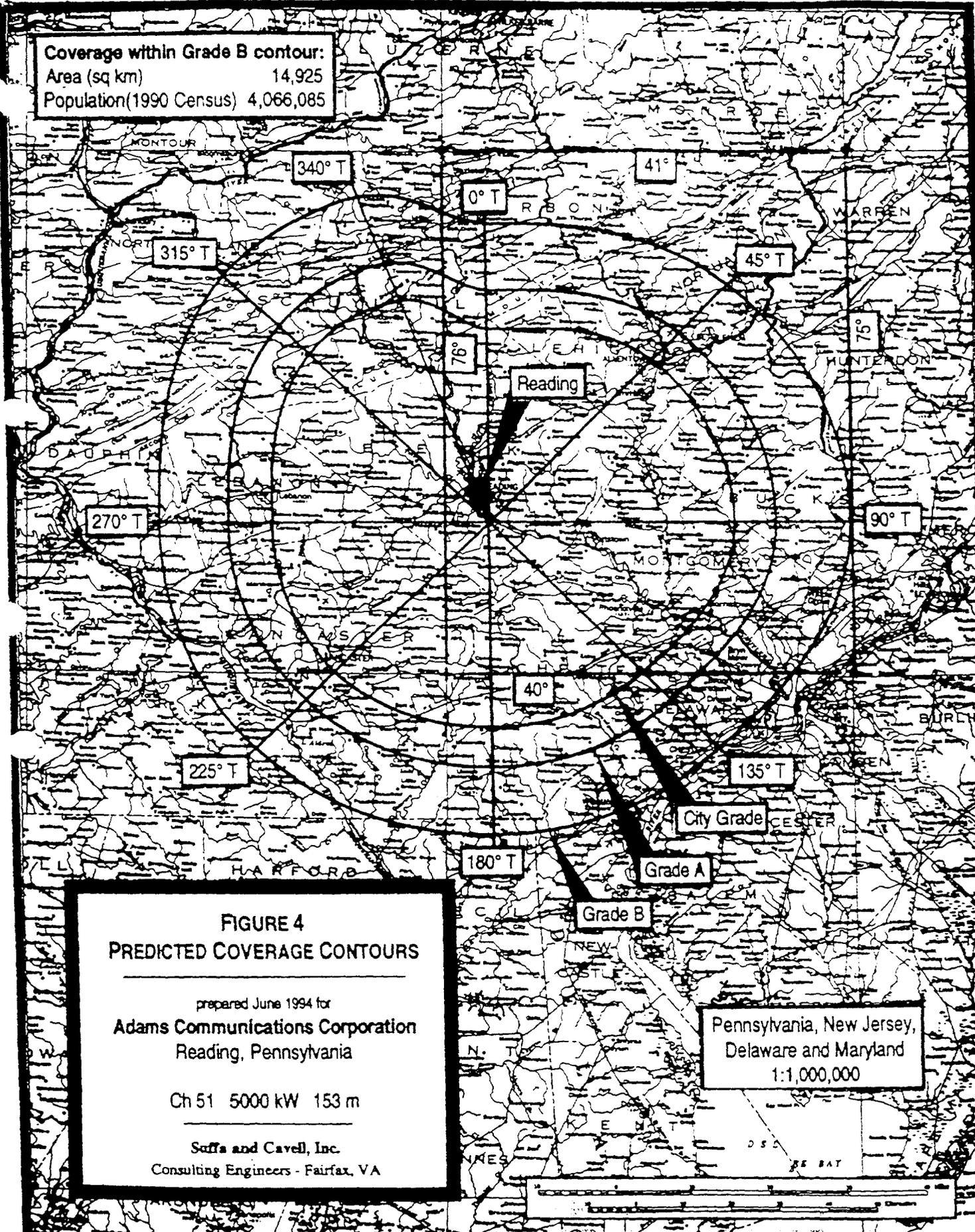
Nevertheless, *Adams* acknowledges its responsibility for the mitigation of reasonable complaints arising from excessively strong signals as required under the Rules. *Adams* also acknowledges its responsibility for the elimination of objectional interference to facilities which are either existing or were authorized prior to a grant of the this application to the extent required by the Rules. Mitigative measures to be employed for any instance of interference may include, but are not necessarily limited to, the installation of filters or traps where appropriate.





READING EXHIBIT 44  
PAGE 93

Coverage within Grade B contour:  
Area (sq km) 14,925  
Population(1990 Census) 4,066,085



**FIGURE 4  
PREDICTED COVERAGE CONTOURS**

prepared June 1994 for  
**Adams Communications Corporation**  
Reading, Pennsylvania

Ch 51 5000 kW 153 m

**Suffs and Cavell, Inc.**  
Consulting Engineers - Fairfax, VA

Pennsylvania, New Jersey,  
Delaware and Maryland  
1:1,000,000

Statement D  
**Environmental Considerations**  
prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*  
Channel 51 5000 kW 153 m

This application proposes to side-mount an omnidirectional Channel 51 antenna on an existing tower in an existing "electronics" site. No change in overall structure height will be necessary. Under Note 1 to Section 1.1306, use of an existing structure is environmentally desirable. Additionally, based upon information provided by the applicant, it is believed that the provisions of 1.1307(a)(1-7) do not apply in this case for the following reasons:

Specifically, the proposed site location is not within an officially designated wilderness area or wildlife preserve. It is believed that the proposed construction will not disturb any endangered or threatened species or designated critical habitats, nor does it appear likely that said construction will jeopardize the continued existence of any proposed endangered or threatened species. No destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973, will occur. The proposed facilities would not affect districts, sites, buildings structures, or objects significant in American history, architecture, archaeology, engineering or culture that are listed in, or eligible for listing in the National Register of Historic Places. The site is not located near nor will it affect known Indian religious sites. The proposed transmitter location is not in a designated flood plain. The site is understood to be substantially cleared; thus, it is not anticipated that significant changes in surface features will be required (e.g., wetland fill or water diversion). Furthermore, no changes to the existing marking and lighting specifications are being proposed herein. (The installation of high intensity lighting, as described under 1.1307(a)(8), is not expected to be imposed by the Federal Aviation Administration.) Therefore, the proposed site may be categorically excluded from environmental consideration and preparation of an Environmental Assessment is not required.

Statement D (Page 2 of 4)  
**Environmental Considerations**

**Human Exposure to Radiofrequency Radiation**

A new antenna system, manufactured by Dielectric Communications, will be side mounted on the existing tower as schematically illustrated in the sketch of **Figure 1**. It will be non-directional in the horizontal plane, and will employ horizontal polarization and electrical beam tilt as discussed in Statement A and the attached Figures and Tables.

Pursuant to §1.1307(b), the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OST Bulletin No. 65 (OST 65). OST 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in the ANSI guideline limits.<sup>1</sup> Under Commission policy, a facility may be presumed to comply with the ANSI guideline if it satisfies the exposure criteria set forth in OST 65.

Based upon that methodology, and as demonstrated in the following, it is believed that the proposed transmitting system will comply with the adopted guidelines for human exposure to RF radiation of ANSI C95.1-1982.

Specifically, Equation #5 on page 13 of OST 65 was used to compute the power density contribution from the proposed Channel 51 operation based upon the following assumptions: Horizontal polarization only, a radiation center located at 45.9 meters above the ground, a proposed peak Visual Effective Radiated Power (ERP) of 5000 kilowatts, an Aural ERP of 10% of the peak visual carrier power (or 500 kilowatts), and a relative vertical (elevation) field factor of 0.10.

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<sup>1</sup> 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), issued by the American National Standards Institute (ANSI), have been adopted by the FCC as the maximum allowable exposure level for humans in the vicinity of transmitting antennas.

Statement D (Page 3 of 4)  
**Environmental Considerations**

Using a vertical field factor of 0.10 is believed to be conservative and appropriate for an antenna of this type since, as demonstrated by **Figure 2B**, the magnitude of the actual elevation pattern is less than 10% field in the downward direction (from about 7° below the horizontal plane to -90°).

Based upon these assumptions, the calculated power density contribution would be 396.45  $\mu\text{W}/\text{cm}^2$  at ground level. This is approximately 17.1 percent of the ANSI limit (of 2,316.67  $\mu\text{W}/\text{cm}^2$ ) at the Channel 51 center frequency.

No other stations of any kind, other than "non-contributory" low power microwave systems or intermittent duty communications equipment are presently in use at or near the designated site. Hence, the contribution of these facilities at the proposed site was not considered in the instant analysis.

**General Public and Worker Safety**

As demonstrated in the preceding, excessive levels of RF energy will not be present at ground level near the proposed supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the ANSI guidelines as a result of a grant of this application. Nonetheless, the supporting tower will be secured to limit public access and appropriate RF warning signs will be posted.

With respect to worker safety at the proposed site, it is believed that based on the supplied analysis, excessive exposure would not occur in normally accessible areas on the ground. With respect to situations when work must be performed on the tower, a site exposure policy encompassing all tower users will be adopted to protect maintenance workers from excessive exposure when work must be performed in areas on the tower where high RF levels are expected to be present. Protective measures

Statement D (Page 4 of 4)  
**Environmental Considerations**

to be employed under this policy may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of the facility when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas.

Since this hilltop is an existing "electronics site", consideration was also given to the possible exposure of tower workers on adjoining towers. A "worst case" assumption of 100% field was employed to determine the horizontal distance from the proposed antenna where RF levels of greater than 100% of the present ANSI limit would occur. Using the previously described methodology, RF levels in excess of the present ANSI limit are predicted to occur at distances of less than 190 meters from the proposed antenna. Based upon a database check of authorized towers, three other communications towers are located on this hilltop within that distance. Hence, under a worst case theoretical analysis (ignoring the actual vertical angle to the adjoining tower), the proposed operation could potentially expose workers on these neighboring towers to RF levels in excess of the ANSI limit. Accordingly, *Adams Communications Corporation* will adopt a hilltop site exposure policy encompassing all tower users within 190 meters to protect maintenance workers from excessive exposure when work must be performed in above ground areas on nearby towers where high RF levels are expected to be present. (RF exposure measurements may be also employed to refine the area of concern.) The previously described protective measures will be employed for the entire hilltop coordination zone.

### **Conclusion**

It is believed that this proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules.

Statement E  
**Emergency Power**  
prepared for  
**Adams Communications Corporation**  
*Reading, Pennsylvania*  
Channel 51 5000 kW 153 m

*Adams Communications Corporation* will employ emergency power generating equipment at the studio and transmitter site to ensure uninterrupted service in the event of a commercial power outage.

ORIGINAL

BECHTEL & GOLE  
CHARTERED  
ATTORNEYS AT LAW  
SUITE 250  
1901 L STREET, N.W.  
WASHINGTON, D.C. 20036  
TELEPHONE (202) 833-4190

MM 49-153

HARRY F. GOLE

TELECOPIER  
(202) 833-3084  
INTERNET/E-MAIL  
COLESLAW@EROLS.COM

April 30, 1999

RECEIVED

APR 30 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

HAND DELIVERED

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: File No. BPCT-940630KG - Application of Adams Communications Corporation for authority to construct a new television station in Reading, Pennsylvania

Dear Ms. Salas:

Submitted herewith in triplicate on behalf of Adams Communications Corporation is an amendment to its above-referenced application (File No. BPCT-940630KG) for authority to construct a new television station in Reading, Pennsylvania.

Please call me if you have any questions about this matter.

Sincerely,

Harry F. Cole

Counsel for Adams Communications Corporation

Cc (w/enc.): Howard A. Topel, Esquire

Haag  
DEPOSITION  
EXHIBIT 5  
11-12-99 eam

COPY SENT REF ROOM

READING EXHIBIT 44  
PAGE 100

RECEIVED

APR 30 1999

AMENDMENT

Federal Communications Commission  
Office of Secretary

The application (File No. BPCT-940630RG) of Adams Communications Corporation for a construction permit for a new television station on Channel 51 in Reading, Pennsylvania, is hereby amended as follows:

1. The accompanying materials are substituted for the corresponding materials in the application as originally filed. All other information as originally filed remains unchanged.
2. The Model Equal Employment Opportunity Program Report is hereby withdrawn pursuant to Commission Public Notice, Report No. MM 98-13, released September 29, 1998.

ADAMS COMMUNICATIONS CORPORATION

By: James J. Gillan  
Title: Vice President  
Date: April 28, 1998

READING EXHIBIT 44  
PAGE 101

**Section II - LEGAL QUALIFICATIONS (Page 2)**

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

- a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.
- b. Citizenship.
- c. Office or directorship held.
- d. Number of shares or nature of partnership interests.
- e. Number of votes.
- f. Percentage of votes.

NOTE: Radio applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

- g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.
- h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

a.	Adams Communications Corporation c/o Robert L. Haag 400 Skokie Blvd. - Ste. 400 Northbrook, IL 60062	Robert L. Haag c/o Robert L. Haag & Co. 400 Skokie Blvd. - Ste. 400 Northbrook, IL 60062	Howard N. Gilbert Holleb & Coff 55 E. Monroe St. - Ste. 4100 Chicago, IL 60603
b.		U.S.	U.S.
c.		President, Director	Vice President, Secretary Director
d.		320	210
e.		320	210
f.		18.5%	12.1%
g.		None	None
h.		None	None

**Section II - LEGAL QUALIFICATIONS (Page 2)**

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

- a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.
- b. Citizenship.
- c. Office or directorship held.
- d. Number of shares or nature of partnership interests.
- e. Number of votes.
- f. Percentage of votes.

NOTE: Radio applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

- g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.
- h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

a.	Robert L. Haag 1994 Family Limited Partnership c/o Robert L. Haag 400 Skokie Blvd.-Ste. 400 Northbrook, IL 60062	Howard N. Gilbert 1994 Family Limited Partnership c/o Howard N. Gilbert 55 E. Monroe St.-Ste. 4100 Chicago, IL 60603	Wayne J. Fickinger 1244 Forest Glen Dr. So. Winnetka, IL 60093
b.	U.S.	U.S.	U.S.
c.	--	--	Vice President, Director, Treasurer
d.	400	100	200
e.	400	100	200
f.	23.1%	5.8%	11.6%
g.	None	None	None
h.	None	None	None