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COUNSEL

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M. SCOTT JOHNSON

April 27, 2022

FILED BY EMAIL PURSUANT TO

Public Notice, *Media Bureau Announces New Procedures for All Filings Currently Submitted in the Consolidated Database system (CDBS)*, DA 22-29, released January 11, 2022, addressed to [audiofilings@fcc.gov](mailto:audiofilings@fcc.gov), [rodolfo.bonaccini@fcc.gov](mailto:rodolfo.bonaccini@fcc.gov); [nazifa.sawez@fcc.gov](mailto:nazifa.sawez@fcc.gov); and [dale.bickel@fcc.gov](mailto:dale.bickel@fcc.gov)

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
45 "L" Street, NE  
Washington, D.C. 20554

Re: WIZZ(AM), Greenfield, MA (Facility I.D. No. 54779)  
FRN: 0009269424  
**Request for Special Temporary Authority**

Dear Ms. Dortch:

Transmitted herewith is a request on behalf of Saga Communications of New England, LLC ("Saga"), licensee of Station WIZZ(AM), Greenfield, MA (Facility ID No. 54779), for special temporary authority to operate station WIZZ with reduced power from a different site. The details of the temporary facilities are described in the request.

The \$210 filing fee associated with this filing, will be paid after the Commission staff issues a file number for this request.<sup>1</sup> If there are any questions, please contact me.

Very truly yours,

SAGA COMMUNICATIONS  
OF NEW ENGLAND, LLC  
  
Gary S. Smithwick  
Its Attorney

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<sup>1</sup> Saga's Anti-Drug Abuse Certification is incorporated in the attached email request.

April 26, 2022

FILED BY EMAIL PURSUANT TO

Public Notice, *Media Bureau Announces New Procedures for All Filings Currently Submitted in the Consolidated Database system (CDBS)*, DA 22-29, released January 11, 2022, addressed to [audiofilings@fcc.gov](mailto:audiofilings@fcc.gov), [rodolfo.bonacci@fcc.gov](mailto:rodolfo.bonacci@fcc.gov); [nazifa.sawez@fccworld.com](mailto:nazifa.sawez@fccworld.com); and [dale.bickel@fcc.gov](mailto:dale.bickel@fcc.gov)

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
45 "L" Street, NE  
Washington, D.C. 20554

Re: WIZZ(AM), Greenfield, MA (Facility I.D. No. 54779)  
**Request for Special Temporary Authority**  
Saga Communications of New England, LLC (FRN 0009269424)

Dear Ms. Dortch:

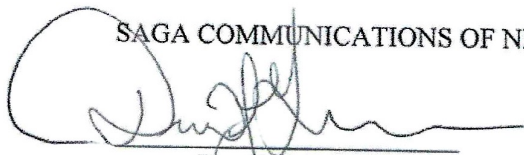
This is to request special temporary authority to permit Station WIZZ(AM), Greenfield, MA, Facility ID No. 54779, to operate with reduced power from a different site using a center loaded, bottom fed, vertical whip antenna with a daytime power of 0.150 kW. A detailed technical exhibit with an explanation of the method to be employed is attached.

The licensee certifies that neither the licensee nor any party to this application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 (21 USC § 862).

If there are any questions, please communicate with our counsel, Gary S. Smithwick, Esq. (Phone: 202-363-4560).

Sincerely yours,

SAGA COMMUNICATIONS OF NEW ENGLAND, LLC



Dan Guin  
Vice President

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# Summary of Special Temporary Authority (STA) Request 1

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**Call letters:** WIZZ (AM)  
**City of License:** Greenfield, MA  
**Frequency:** 1520 kHz  
**File No:** BL-19800819AB  
**Facility ID:** 54779  
**Applicant:** Saga Communications of New England, LLC

**Requested STA Purpose:** Engineering STA  
**Technical Specification:** Other Antenna System

## Explanation of Special Temporary Authority (STA) Request

WIZZ(AM) - Greenfield, MA (1520 kHz) is licensed under BL-19800819AB to operate with a daytime only directional power of 10.0 kW into a two-tower directional antenna array. WIZZ(AM) also holds granted construction permit BP-20210723AAI for a daytime non-directional power of 1.0 kW and critical hours non-directional power of 0.16 kW authorizing diplexing into the existing WHMQ(AM) non-directional tower, which does not require Antenna Structure Registration.

On May 3, 2022, the existing licensed WIZZ(AM) two-tower array will be decommissioned with WIZZ(AM) forced to vacate the property. However, due to pandemic related supply chain issues, the diplexing hardware, as authorized under BP-20210723AAI, remains back-ordered. Therefore, during this period between the loss of the licensed site, delivery/installation of the WIZZ(AM)/WHMQ(AM) diplexer and licensing of the outstanding WIZZ(AM) construction permit; WIZZ(AM) requests operation from a temporary HPR.0990 AM antenna (center-loaded, bottom fed, vertical whip antenna). The temporary antenna will be installed on the main WHMQ(AM) transmitter building. The WHMQ(AM) transmitter building is located adjacent to the unregistered licensed WHMQ(AM) tower and bears essentially the same site coordinates as authorized WIZZ(AM) construction permit BP-20210723AAI and WHMQ(AM) license BML-20191028ACR. As previously noted, the authorized WIZZ(AM) construction permit proposes diplexing with WHMQ(AM).

WIZZ(AM) therefore requests emergency daytime only non-directional Special Temporary Authority (STA) from this HPR.0990 AM antenna, using 0.150 kW of non-directional daytime power. 0.150 kW of non-directional power represents less than one quarter (1/4) the licensed daytime non-directional power, therefore, falling under the provisions of 47 C.F.R. Section 73.1680(b)(1). This proposed Special Temporary Authority (STA), AM 1520 kHz facility will not operate during critical hours or nighttime hours. This proposed Special Temporary Authority (STA), AM 1520 kHz facility will only operate during standard daytime hours.

Upon a grant of this 47 C.F.R. Section 73.1680(b)(1) daytime only, non-directional Special Temporary Authority (STA) request, the non-directional antenna resistance will be measured and antenna current appropriately set for operation with a daytime only non-directional power of 0.150 kW. Documentation concerning the proposed STA site and HPR.0990 manufacturer's antenna parameters have been included herein.

Use of the HPR.0990 AM antenna (center loaded, bottom fed, vertical whip antenna) for Special Temporary Authority (STA) purposes has been previously established under a similar authority filing, BSTA-20190905AAC; granted 09/06/2019 for Facility ID: 67081.

The above circumstances warrant the stated temporary operation at variance from the Commission's rules (1) with regard to the broadcasting facility showings of 47 C.F.R. Section(s) 73.24 - 73.1650; and daytime protection showings as required by 47 C.F.R. Section 73.182; (2) with regard to public interest, this STA operation will allow WIZZ(AM) to provide service during this period rather than request silent authority and remove an existing aural service from the community; and (3) the expected duration of this STA is not expected to exceed 180 days of operation. Upon installation of the WIZZ(AM)/WHMQ(AM) diplexer, a Form 302-AM License to Cover Application will be filed on behalf of WIZZ(AM); and Form 302-AM Direct Measurement of Power filed on behalf of WHMQ(AM). The tentative date for the installation of the diplexer hardware is November 1, 2022.

**Anti-Drug Abuse Act Certification.** The applicant certifies that neither the applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

**CERTIFICATION OF TECHNICAL CONSULTANT:** *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-three years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*

  
Justin W. Asher  
Technical Consultant  
April 25, 2022

# Summary of Special Temporary Authority (STA) Request

2

**Call letters:** WIZZ (AM)  
**City of License:** Greenfield, MA  
**Frequency:** 1520 kHz  
**File No:** BL-19800819AB  
**Facility ID:** 54779  
**Applicant:** Saga Communications of New England, LLC

## TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

### TECH BOX

7.0.	STA is requested for use of <input type="radio"/> Licensed Antenna system with: <input type="radio"/> Reduced power <input type="radio"/> Reduced hours of operation <input type="radio"/> Required equipment out of service <input type="radio"/> Other variance  <input type="radio"/> Antenna system authorized by Construction Permit: Describe requested modes of operation  <input type="radio"/> Emergency wire antenna. Provide a full description in the Exhibit to Question 8. Do not complete the directional or nondirectional tower subforms.  <input checked="" type="radio"/> Other antenna system: (Complete Items 7.1 - 7.7)
7.1.	Frequency: 1520 kHz
7.2.	Class (select one): A <input type="radio"/> B <input type="radio"/> C <input type="radio"/> D <input checked="" type="radio"/>
7.3.	Hours of Operation: <input type="radio"/> Unlimited <input type="radio"/> Limited <input checked="" type="radio"/> Daytime <input type="radio"/> Share Time <input type="radio"/> Specified Hours:
7.4.	Daytime: <input checked="" type="radio"/> Yes <input type="radio"/> No [Daytime Operation]
<b>7.4. Daytime Operation</b>	
a. Power: 0.150 kW	
b. Antenna Location Coordinates: (NAD 27)	
Latitude: Degrees 42 Minutes 35 Seconds 20.6 <input checked="" type="radio"/> North <input type="radio"/> South	
Longitude: Degrees 72 Minutes 37 Seconds 05.8 <input checked="" type="radio"/> West <input type="radio"/> East	

7.4. Complete the appropriate following items. If additional space is needed, please provide the information requested below in an Exhibit.

Nondirectional  Directional

Theoretical RMS: 155.5 mV/m per kW at 1 km (Nondirectional)  
mV/m at 1 km (Directional)

Standard RMS: mV/m at 1 km (Directional Only)

**7c. Nondirectional Tower:**

Tower Number	1
Overall height above ground (include obstruction lighting) (meters)	15.9
Antenna structure registration	Number: <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not Applicable
Is this tower:	<input type="radio"/> (a) Top-loaded <input type="radio"/> (b) Sectionalized <input checked="" type="radio"/> (c) Neither
Height of radiator above base insulator, or above base, if grounded (meters)	9.5
Electrical height of radiator (degrees)	16.6
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

7.5. **Nighttime:**  Yes  No  
[Nighttime Operation]

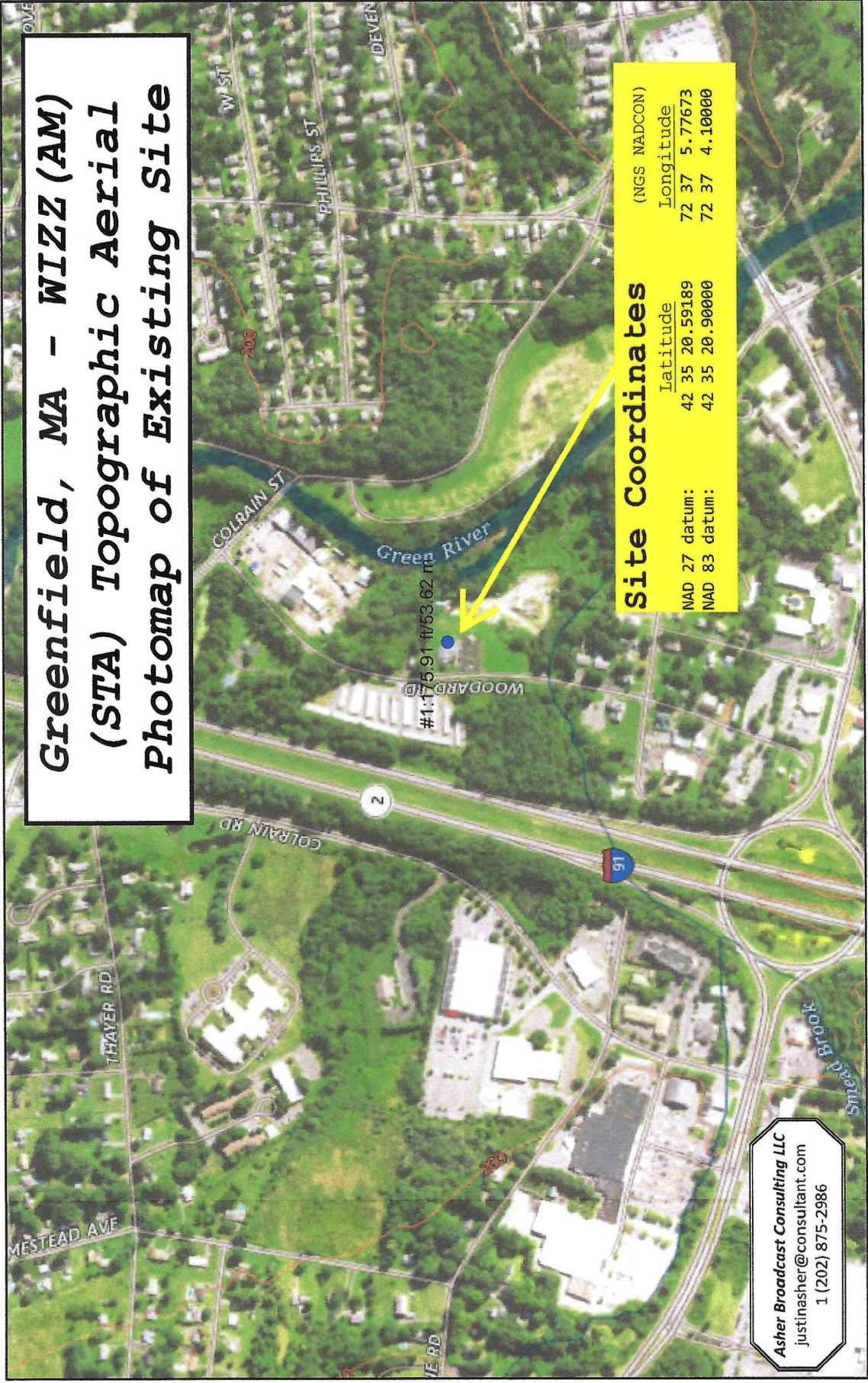
7.6. **Critical Hours Operation:**  Yes  No  
[Critical Hours Operation]

7.7. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.**

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

Yes  No

**Greenfield, MA - WIZZ (AM)  
(STA) Topographic Aerial  
Photomap of Existing Site**



**Site Coordinates**

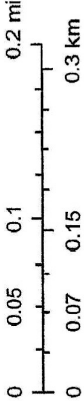
NAD 27 datum:		NAD 83 datum:	
Latitude	Longitude	Latitude	Longitude
42 35 20.59189	72 37 5.77673	42 35 20.90000	72 37 4.10000

(NGS NADCON)

Asher Broadcast Consulting LLC  
justinasher@consultant.com  
1 (202) 875-2986

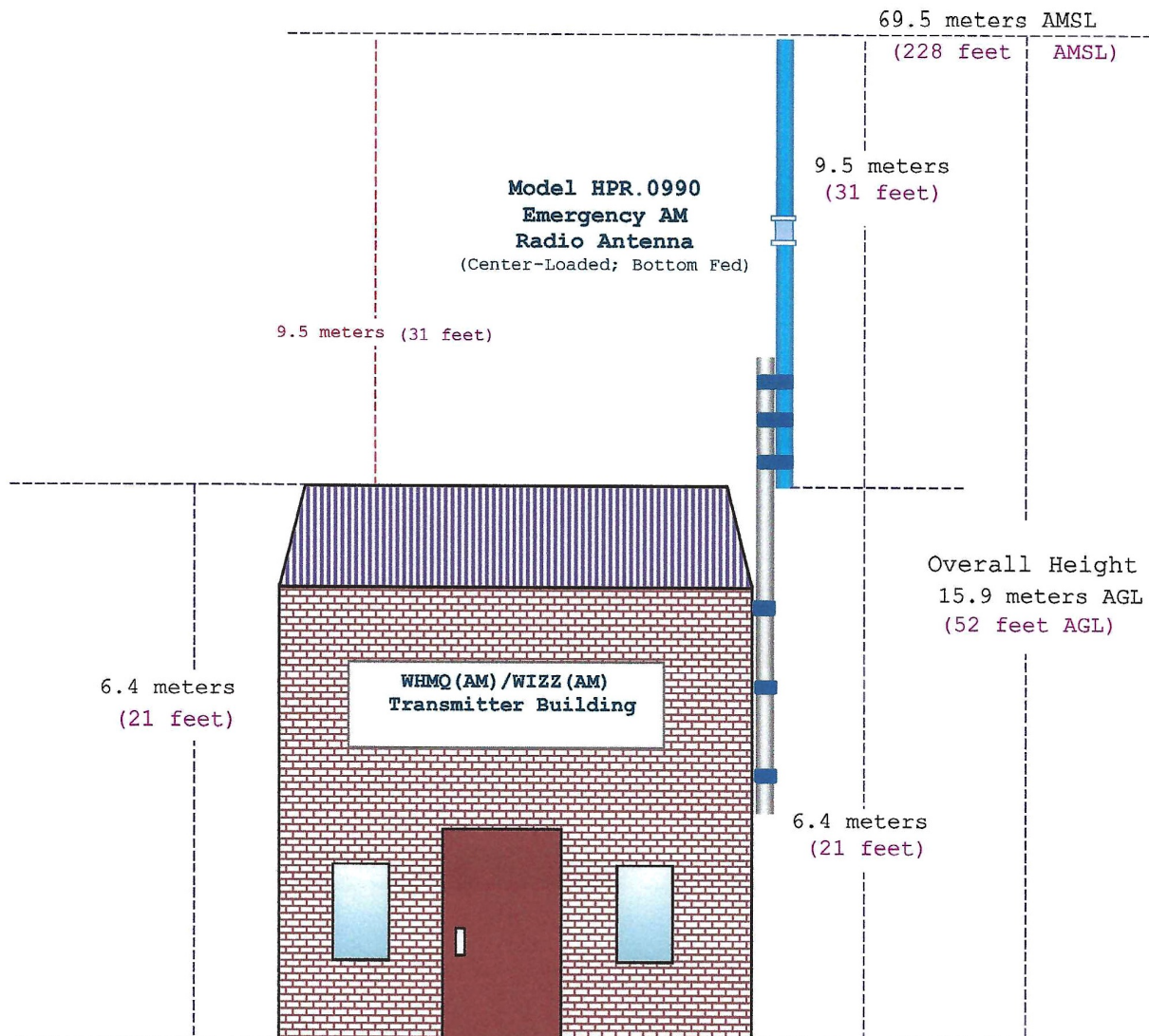
3/18/2022, 11:17:56 AM

1:9,028



# Greenfield, MA - WIZZ(AM) (STA)

## Vertical Plan of Antenna System



<b>Ground Elevation:</b> 53.6 meters AMSL (176 feet AMSL)		
<b>Address:</b> 81 Woodard Road		
<b>City:</b> Greenfield		
<b>County:</b> Franklin		
<b>State:</b> Massachusetts		
		<u>Latitude (D M S)</u> <u>Longitude (D M S)</u>
		NAD 27 datum values: 42 35 20.59189    72 37 5.77673
		NAD 83 datum values: 42 35 20.90000    72 37 4.10000
<b>Antenna Structure Registration</b>	Drawing Is Not To Scale	<b>Asher Broadcast Consulting, LLC</b> justinasher@consultant.com 1(202)875-2986
Not Required		

**Greenfield, MA - WIZZ(AM) (STA)**  
**FAA TOWAIR Determination**  
*(public record copy)*

**TOWAIR Determination Results**

A routine check of the coordinates, heights, and structure type you provided indicates that this structure does not require registration.

**\*\*\* NOTICE \*\*\***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

**DETERMINATION Results**

**PASS SLOPE(50:1): NO FAA REQ-RWY 10499 MTRS OR LESS & 7507.83 MTRS (7.50779 ) KM AWAY**

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	42-35-42.00N	072-31-36.00W	TURNERS FALLS	FRANKLIN MONTAGUE, MA	107.5	975.3999999999998

**Your Specifications**

**NAD83 Coordinates**

Latitude	42-35-20.9 north
Longitude	072-37-04.1 west

**Measurements (Meters)**

Overall Structure Height (AGL)	15.9
Support Structure Height (AGL)	6.4
Site Elevation (AMSL)	53.6

**Structure Type**

BANT - Building with Antenna on top

**Tower Construction Notifications**

Notify Tribes and Historic Preservation Officers of your plans to build a tower.



# Greenfield, MA - WIZZ(AM) (STA) Manufacturer's Antenna Documentation (public record copy)

**\*Based on the manufacturer's element length data ranging from 32 ft for 530 kHz to 29.5 ft for 1700 kHz; this STA facility will broadcast with a mathematical element length of 29.9 ft (9.1 meters), or 16.6° electrical degrees for operation on 1520 kHz.**

**\*Based on the manufacturer's element efficiency data ranging from 54 mV/m/km for 530 kHz to 175 mV/m/km for 1700 kHz; this STA facility will broadcast with a mathematical element efficiency of 155.5 mV/m/km for operation on 1520 kHz.**

## High Performance AM Radio Antenna (HPR.0990)



### High Power plus High Efficiency

This high performance AM radio antenna offers communication professionals the ability to establish an AM broadcast signal capable of reaching greater distances than before possible with antennas of similar design. More than twice as efficient as comparable antennas, this high capacity antenna is compact and light-weight, making it easy to ship and install. It is also competitively priced.

### Frequency Range

Different versions of the antenna's design allow it to function on any AM frequency in the 530 to 1710 kHz range. Field tests prove that this antenna is capable of handling hundreds of watts, producing a coverage pattern that can exceed 20 miles in radius.

### Users

Common users are emergency managers and associated amateur radio operators who want to reach their publics during times when power, other communications and internet services are compromised. Commercial broadcasters can also benefit by using the High Performance AM Radio Antenna to keep their AM stations on the air temporarily at low power following calamities. And amateur radio enthusiasts who want a solution for special applications that can be installed in confined spaces will benefit.

Travelers' Information Station licensees can easily upgrade to the HPR.0990 Antenna because a similar mounting format. The antenna's efficiency will allow a 10-watt signal to be produced that is two to four times that of the standard antenna, depending on frequency. A waiver is required from the FCC if the station's field intensity would exceed 2.0 mV/m at 1.5 km (0.93 mile).

When utilized in higher-wattage applications As a higher wattage antenna as part of the RadioSAFE System, an emergency Special Temporary Authority (STA) from the FCC is required. See our Licensing Services webpage.

Engineering for the required waivers and STA's can be supplied by Information Station Specialists.

### Specifications

- Power: up to 300 watts - 50 ohms.
- Frequency range: 470 kHz to 1800 kHz.
- Type: center-loaded, bottom-fed vertical, whip-type antenna with capacitive hat. Omni directional. Anodized black aluminum finish. Adjustable tuning. Guying ring.
- Radiation efficiency: at 45' tip height above ground on a 20' metal support pole with 50' 32-element groundplane (or Unirod grounding), varies from 54 mV/m/km (530 kHz) to 175 mV/m/km (1700 kHz).
- Bandwidth varies with frequency (3:1 SWR): 530 kHz: 6 kHz. 1700 kHz: greater than 10 kHz.
- Temperature endurance: -40°C to 85°C.
- Wind endurance: greater than 100 MPH unguyed. Greater than 140 MPH with the addition of guy wires.
- Weight of the complete antenna varies with frequency from 27 lbs. (1700 kHz) to 40 lbs (530 kHz).
- 4 Sections. Overall assembled length varies with frequency and tip extension required. Typical: 530 kHz; 385" (32'). 1700 kHz; 354" (29.5'). Includes assembly hardware.
- Recommended separation from buildings and structures: 100' or equal to the height of the structure, whichever is greater.
- Available options include matching transformer and lightning arrestor, coaxial cable and feedlines, guying kits, masts with insulators, fully assembled groundplanes and uniroids.
- RF exposure separation: 1 meter minimum recommended for both occupational and controlled environments.



*Greenfield, MA - WIZZ(AM) (STA)  
Manufacturer's Antenna Documentation  
(public record copy)*



**Information Station Specialists, Inc.**

[www.theRADIOsource.com](http://www.theRADIOsource.com)

**PRODUCT INFORMATION SHEET**

**Component** High Performance AM Radio Antenna

**Part Number** HPR.0990

**Image**



**Description**

- Power: up to 300 watts - 50 ohms.
- Frequency range: 470 kHz to 1800 kHz.
- Type: center-loaded, bottom-fed vertical, whip-type antenna with capacitive hat. Omni directional. Anodized black aluminum finish. Adjustable tuning. Guying ring.
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- RF exposure separation: 1 meter minimum recommended for both occupational and controlled environments.

*All products described are subject to availability based on manufacturing capacity and shipping dates. While every effort has been made to ensure the accuracy of all information, ISS does not accept liability for any errors or omissions and reserves the right to change information as needed.*

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# Greenfield, MA - WIZZ(AM) (STA)

## Compliance with Radiofrequency Radiation Guidelines 1

**Explanation of Study.** The proposed facility complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments as set forth under §1.1310 of the Commission's rules and the guidelines for RF radiation protection guidelines as set forth in OET Bulletin No. 65 (Edition 97-01), and the accompanying Supplement A, (Edition 97-01). The site is intended to house multiple transmitters of mixed aural origin; however, only this WIZZ(FM) STA facility has been analyzed for purposes of this interim Special Temporary Authority (STA) operation.

Concerning AM contributions, FCC supplied MININEC interpolated graphs were used to determine individual AM contributions. MININEC AM Model Figure(s) 1-4 have been taken directly from, and employ the standards of, OET Bulletin No. 65 (Edition 97-01). The relevant MININEC AM Model Figure has been shown in graphical form at the end of this report with the predicted electrical field (V/m) and magnetic field (A/m) noted. For each AM contribution, the maximum contribution has been assumed using the maximum power regardless of mode of operation or directional tower power distribution. The AM contribution(s) have been interpolated at the nearest distance to the tower (horizontal or vertical).

This Special Temporary Authority (STA) request for WIZZ(AM) - Greenfield, MA analog AM Class D facility (Facility ID: 54779) will operate on a frequency of 1520 kHz with a daytime only non-directional power of 0.150 kW. The element employs a vertical radiator of 16.6° or 0.046 λ (wavelengths) for operation on the AM frequency. The Model HPR.0990 AM Antenna (center-loaded, bottom fed, vertical whip antenna) will be side mounted on the transmitter building with the bottom of the element no less than 21 ft (6.4 meters) above ground level. Given a standard two meter person at ground level, the element will be no less than 4.4 meters removed from any publicly accessible area. Table 1 of Supplement A specifies for 0.1 wavelength AM towers operating on 1520 kHz with a total input power of 1.0 kW or less, the non-ionizing radiation will fall to safe levels at distances of at least 3.0 meters (9.9 feet) or more. Therefore, this facility further complies with Supplement A accounting for the vertical height above ground employed.

**Results of Study.** The sum of the individual contribution as a percentage of the maximum permissible uncontrolled limit has been provided below. As the sum exposure is less than 100% for the uncontrolled environment, this operation remains in compliance with the provisions of OET Bulletin No. 65 (Edition 97-01). As stated before, protection of the uncontrolled environment implies protection of the controlled environment. The facility is, or will be, properly marked with signs. Entry is, or will be, restricted by means of fencing with locked doors or gates. Furthermore, coordination with other users of the site will be secured to reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

