

# BakerHostetler

Baker&Hostetler LLP

Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5403

T 202.861.1500  
F 202.861.1783  
www.bakerlaw.com

November 2, 2022

Davina S. Sashkin  
direct dial: 202.861.1759  
dsashkin@bakerlaw.com

**VIA E-MAIL (AUDIOFILINGS@FCC.GOV)**

Media Bureau - Audio Division  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

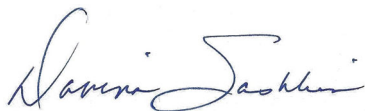
*Re: Request for Extension of Special Temporary Authority  
Truth Broadcasting Corporation  
WHVN(AM), Charlotte, NC (FIN 72331)*

Dear Sir or Madam:

Truth Broadcasting Corporation, by its undersigned counsel, hereby submits the attached Request for Extension of Special Temporary Authority for continued operation of WHVN(AM) in Charlotte, North Carolina.

Should you have any questions regarding this matter, please contact the undersigned.

Sincerely,



Davina S. Sashkin  
*Counsel for Truth Broadcasting Corporation*

Attachment

**Request for Extension of Engineering STA**  
**Truth Broadcasting Corporation (FRN 0004985149)**  
**WHVN(AM), Charlotte, NC (FIN 72331)**

Truth Broadcasting Corporation (TBC), licensee of WHVN(AM), Charlotte, NC, respectfully requests a further extension of its Special Temporary Authority (STA) to continue operating WHVN from an alternate site while it continues to pursue permanent relocation of the station's transmitter site and a return to full power.

Due to a loss of its previous licensed transmitter site, TBC has been operating WHVN at an alternate location within the station's community of license under the following parameters authorized in the initial STA (*see* CDBS File No. BSTA-20200831AAL, as extended by BESTA-20210317AAE, BESTA-20211103AAD, and BESTA-20220427AAL):

Geographic Coordinates:	35° 15' 50" N, 80° 46' 13" W (NAD 1927)
Frequency:	1240 kHz
Hours of Operation:	Day and Night
Operating Power:	0.6 kW
Antenna Type:	Single wire unipole system
Electrical Height of Radiator:	68 degrees
Antenna Efficiency:	291.4 mV/m/kW at 1 km

During the current STA term, TBC undertook efforts to relocate the station, including ordering an engineering analysis of a potential duplex that, unfortunately, proved cost-prohibitive to construct. TBC, therefore, requires additional time to find a suitable site for permanent, full-power operations.

Grant of the STA extension will serve the public interest by allowing WHVN to continue serving a portion of the station's licensed coverage area while it continues its efforts to find a suitable tower site and restore the station to full operational status.

The included Figure 1 supplies a comparative coverage map showing that the STA's 0.5 mV/m contour does not exceed WHVN's presently authorized 0.5 mV/m contour. As is also shown, the principal community coverage contour developed under the STA is predicted to encompass 52.6% of the population of the city of license, Charlotte, North Carolina.

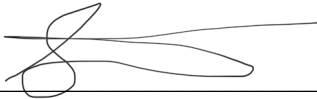
**Environmental Considerations**

It is believed that the proposed STA facility may be excluded from environmental processing under 47 C.F.R. § 1.1306 because the facility will not create a significant environmental impact. An existing tower is being used for the current STA with no changes required in the tower or the immediate area surrounding it. Also, this STA operation will comply with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments.

The tower base area will be surrounded by a posted and locked fence that will limit approach to distances of greater than two meters. Therefore, exposure at publicly accessible locations from the 600-watt folded unipole antenna will be well below the general public limits (*i.e.*, 18.74% of the electric and 10.54% of the magnetic MPE limits for uncontrolled/general population environments.) If necessary, measurements can be conducted to confirm compliance. Further, the applicant affirms that it is the only user of the site but will nevertheless coordinate with any future users of the site. Additionally, the applicant 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.

Anti-Drug Abuse Certification

TBC certifies that neither it 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.



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Stuart W. Epperson, Jr.  
President

November 1, 2022

**FIGURE 1 - COMPARATIVE COVERAGE  
WHVN AS LICENSED VS PROPOSED STA**

prepared August 2020 for  
**WHVN, Inc.**

WHVN(AM) Charlotte, North Carolina (Facility ID 72331)  
1240 kHz 1 kW ND2 U

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

**Predicted 5 mV/m**  
Licensed WHVN  
WHVN STA

**Predicted 0.5 mV/m**  
Licensed WHVN  
WHVN STA

**FCC Figure M-3**  
Conductivity Line  
Conductivity Value

