

**Call letters:** WCRV (AM)  
**City of License:** Collierville, TN  
**Channel:** 640 kHz  
**File No:** BL-19910906AC / BZ-20130924AJV  
**Facility ID:** 6486  
**Applicant:** Bott Broadcasting Company/Tennessee

**Requested STA Purpose:** Engineering STA  
**Technical Specification:** Licensed Antenna System with Other Variance

## Explanation of Special Temporary Authority (STA) Request for a Licensed Antenna System with Other Variance.

WCRV(AM) - Collierville, TN (640 kHz) is licensed to operate from a common daytime and nighttime site with a daytime non-directional daytime power of 50.0 kW and a nighttime two-tower directional power of 0.480 kW. Nighttime tower two (southwest tower; ASRN 1043822) of the two-tower nighttime array serves as the daytime non-directional tower. WCRV(AM) operates under License BL-19910906AC / BZ-20130924AJV.

On January 5, 2023, a failure of a nighttime contactor switch occurred, rendering the nighttime array inoperable. As a result, operation into the nighttime directional array is not possible at this time. Repairs are scheduled to occur within the next few weeks. Therefore, special temporary authority will be necessary during this interim period.

WCRV(AM) therefore requests emergency nighttime special temporary authority from the daytime non-directional site using 0.120 kW of non-directional power. 0.120 kW of non-directional power represents one quarter (1/4) the licensed nighttime directional power of 0.480 kW, as allowed per 47 C.F.R. Section 73.1680(b)(1).

Given the licensed (BZ-20130924AJV) daytime non-directional antenna resistance of 50 ohms, this nighttime STA of 0.120 kW non-directional will operate with an antenna current of 1.55 amperes.

No special authority is required for the licensed daytime non-directional operation.


Regarding environmental compliance, the applicant certifies RF compliance of this STA request for 0.120 kW of nighttime non-directional operation from the present daytime non-directional tower. As WCRV(AM) presently operates from the tower with 50.0 kW of non-directional power during the daytime hours; this additional 0.120 kW nighttime non-directional STA request from the same tower will categorically fall within the present fencing limits.

Regarding compliance with the Nationwide Programmatic Agreement and NHPA Section 106 for tower co-location, compliance with the Agreement is not required where no new tower construction is being proposed and the tower is not being substantially altered. Specifically, compliance is not necessary where only an existing AM, NDA tower daytime tower is being used for nighttime STA purposes as here. However, should the Commission determine compliance is necessary, upon notification to the applicant, the applicant will file FCC Form 621.

Therefore, temporary operation at a variance from the Commission's rules is believed merited (1) with regard to the broadcasting facility showings of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650; and nighttime protection showings as required by 47 C.F.R. Section 73.182. No STA provisions are required for daytime operation at this time; (2) with regard to public interest, this STA operation will allow WCRV(AM) to provide service during the repair process 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. Construction/repairs above the nighttime base pier and insulator will not occur, with full restoration of nighttime licensed parameters expected. However, if licensed parameters cannot be restored, the licensee will file a Form 302-AM direct measurement of power upon completion of the contactor repairs notifying of any changes to the nighttime antenna monitor parameters which may result.

Regarding any necessary 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  
January 9, 2023

# Summary of Special Temporary Authority (STA) Request

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**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<br><input checked="" type="radio"/> Licensed Antenna system with:<br><input type="radio"/> Reduced power<br><input type="radio"/> Reduced hours of operation<br><input type="radio"/> Required equipment out of service<br><input checked="" type="radio"/> Other variance<br><br><input type="radio"/> Antenna system authorized by Construction Permit: -<br>Describe requested modes of operation<br><br><input type="radio"/> Emergency wire antenna. Provide a full description in the Exhibit to Question 8. Do not complete the directional or nondirectional tower<br><br><input type="radio"/> Other antenna system: (Complete Items 7.1 - 7.7)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                         |
| 7.1. | Frequency: 640 kHz                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                         |
| 7.2. | Class (select one):<br>A <input type="radio"/> B <input checked="" type="radio"/> C <input type="radio"/> D <input type="radio"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                         |
| 7.3. | Hours of Operation:<br><input type="radio"/> Unlimited <input type="radio"/> Limited <input type="radio"/> Daytime <input type="radio"/> Share Time <input checked="" type="radio"/> Specified Hours: <i>Nighttime Only 1/4 Licensed Power NDA Request</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                         |
| 7.4. | <b>Daytime:</b> <input type="radio"/> Yes <input checked="" type="radio"/> No<br>[Daytime Operation]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                         |
| 7.5. | <b>Nighttime:</b> <input checked="" type="radio"/> Yes <input type="radio"/> No<br>[Nighttime Operation]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                         |
| 7.6. | <b>Critical Hours Operation:</b> <input type="radio"/> Yes <input checked="" type="radio"/> No<br>[Critical Hours Operation]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                         |
| 7.7. | <p><b>Environmental Protection Act.</b> 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 <b>Exhibit is required.</b></p> <p>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.</p> <p>Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.</p> | <input checked="" type="radio"/> Yes <input type="radio"/> No<br><br>See Explanation in |