

FOR
FCC
USE
ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY

FILE NO.

Section I - General Information

1	Legal Name of the Applicant		
	Mailing Address		
	City	State or Country (if foreign address)	ZIP Code
	Telephone Number (include area code)		E-Mail Address (if available)
	FCC Registration Number	Call Sign	Facility ID Number

2.	Contact Representative (if other than applicant)	Firm or Company Name	
	Mailing Address		
	City	State or Country (if foreign address)	ZIP Code
	Telephone Number (include area code)		E-Mail Address (if available)

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

☐ Governmental Entity ☐ Other _____

4. Application Purpose.

- | | |
|--|--|
| <input type="checkbox"/> New Station | <input type="checkbox"/> Major Modification of construction permit |
| <input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments | <input type="checkbox"/> Minor Modification of construction permit |
| <input type="checkbox"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments using Tribal Priority | <input type="checkbox"/> Major Amendment to pending application |
| | <input type="checkbox"/> Minor Amendment to pending application |
| <input type="checkbox"/> Major Change in licensed facility | |
| <input type="checkbox"/> Minor Change in licensed facility | |

a. File number of original construction permit: _____

☐ N/A

b. Service Type: ☐ AM ☐ FM ☐ TV ☐ DTV ☐ DTS

c. DTV Type: ☐ Pre-Transition ☐ Post-Transition ☐ Both

d. Community of License:

City	State
------	-------

e. Facility Type: ☐ Main ☐ Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☐ Yes ☐ No

2. **Parties to the Application.**

a. List the applicant, and, if other than a natural person, its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.

(2) Citizenship.

(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's **equity/debt plus** standard, etc.

(4) Percentage of votes.

(5) Percentage of total assets (equity plus debt).

(1)	(2)	(3)	(4)	(5)

b. Applicant certifies that equity and financial interests not set forth above are non-attributable.

☐ Yes ☐ No

See Explanation in Exhibit No.

☐ N/A

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.

☐ N/A

4. **Multiple Ownership.**

a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?

☐ Yes ☐ No

If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.

Exhibit No.

Section II - Legal

- b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules.

☐ Yes ☐ No

Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. Section 73.3555(a).

See Explanation
in Exhibit No.
5

All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. Section 73.3555.

- c. Applicant certifies that the proposed facility:

☐ Yes ☐ No

- (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;
- (2) complies with the Commission's policies relating to future ownership interests; and
- (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

See Explanation
in Exhibit No.

- d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. Section 121.201), and holds:

☐ Yes ☐ No

- (1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or
- (2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or
- (3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?

See Explanation
in Exhibit No.

All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.

5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application

☐ Yes ☐ No

- a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
- b. any pending broadcast application in which character issues have been raised.

See Explanation
in Exhibit No.

6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

☐ Yes ☐ No

See Explanation
in Exhibit No.

7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

☐ Yes ☐ No

See Explanation
in Exhibit No.

8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

☐ Yes ☐ No

9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.

☐ Yes ☐ No

10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.

☐ Yes ☐ No ☐ N/A

Exhibit No.

An exhibit is required unless this question is inapplicable.

11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither 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.

☐ Yes ☐ No

12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

☐ Yes ☐ No ☐ N/A

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

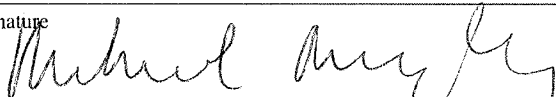
☐ Yes ☐ No ☐ N/A

14. **Tribal Priority - Threshold Qualifications.** Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.

☐ Yes ☐ No

Exhibit No.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing MICHAEL MAZURSKY	Typed or Printed Title of Person Signing President
Signature 	Date 5/11/23

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Charles M. Anderson	Relationship to Applicant (e.g., Consulting Engineer) Engineering Consultant	
Signature	Date	
Mailing Address 5900 Lake Cyrus Drive		
City Hoover	State or Country (if foreign address) AL	ZIP Code 35244
Telephone Number (include area code) 270-535-4432	E-Mail Address (if available) cmanderson43@yahoo.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Charles M. Anderson	Relationship to Applicant (e.g., Consulting Engineer) Engineering Consultant	
Signature Charles M. Anderson	<small>Digitally signed by Charles M. Anderson DN: cn=Charles M. Anderson, o, ou, email=cmanderson43@yahoo.com, c=US Date: 2023.05.08 16:09:41 -05'00'</small>	Date 5/8/23
Mailing Address 5900 Lake Cyrus Drive		
City Hoover	State or Country (if foreign address) AL	ZIP Code 35244
Telephone Number (include area code) 270-535-4432	E-Mail Address (if available) cmanderson43@yahoo.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III - A AM Engineering

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

1. Frequency: kHz

2. Class: ☐ A ☐ B ☐ C ☐ D

3. Hours of Operation: ☐ Unlimited ☐ Limited ☐ Daytime ☐ Share Time ☐ Specified Hours:

4. Daytime Operation: ☐ Yes ☐ No

a. Power: kW

b. Antenna Location Coordinates: (NAD 27)

°

'

"

°

'

"

°

'

"

☐ N ☐ S Latitude

☐ E ☐ W Longitude

c. Nondirectional: ☐ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<div><div>Number</div><div><input type="checkbox"/> Notification filed with FAA</div><div><input type="checkbox"/> Not applicable</div></div>
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

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TECH BOX - DAYTIME OPERATION

d. Directional:

☐ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m at 1 km

Standard RMS: _____ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div>Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth

Span

Augmentation radiation
(mV/m at 1 km)

TECH BOX - NIGHTTIME OPERATION

5. Nighttime Operation:

☐ Yes ☐ No

a. Power: _____ kW

b. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " ☐ N ☐ S Latitude
 _____ ° _____ ' _____ " ☐ E ☒ W Longitude

c. Nondirectional:

☐ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<p>_____ Number</p> <p><input type="checkbox"/> Notification filed with FAA</p> <p><input type="checkbox"/> Not applicable</p>
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - NIGHTTIME OPERATION

d. Directional:

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

☐ Yes ☐ No

Exhibit No.

Theoretical mV/m at 1 km

Standard RMS: mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div style="border-bottom: 1px solid black; text-align: center; margin-bottom: 5px;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center; margin-bottom: 5px;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center; margin-bottom: 5px;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center; margin-bottom: 5px;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: mV/m at 1 km

Azimuth
Span
Augmentation radiation

TECH BOX - CRITICAL HOURS OPERATION

6. Critical Hours Operation:

☐ Yes ☐ No

a. Power: _____ kW

b. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " ☐ N ☐ S Latitude
 _____ ° _____ ' _____ " ☐ E ☐ W Longitude

c. Nondirectional:

☐ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	<div style="text-align: center;"> _____ Number </div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (meters)	
A	
B	
C	
D	

TECH BOX - CRITICAL HOURS OPERATION

d. Directional:

☐ Yes ☐ No

if "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical mV/m at 1 km

Standard RMS: mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable	<div style="border-bottom: 1px solid black; text-align: center;">Number</div> <input type="checkbox"/> Notification filed with FAA <input type="checkbox"/> Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: mV/m at 1 km

Azimuth

Span

Augmentation radiation

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

7. **Broadcast Facility.** The proposed facility complies with the engineering standards and assignment requirements 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. **Exhibit Required.**
- ☐ Yes ☐ No See Explanation in Exhibit No. EE
- Exhibit No.
8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).
- ☐ Yes ☐ No See Explanation in Exhibit No. EE
9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.
- ☐ Yes ☐ No See Explanation in Exhibit No. EE
10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.
- Groundwave.**
- a. ☐ 47 C.F.R. Section 73.37
- Skywave.**
- b. ☐ 47 C.F.R. Section 73.182.
- Critical Hours.**
- c. ☐ 47 C.F.R. Section 73.187.
- Exhibit No.
- Exhibit No.
- Exhibit No.
11. **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 radio frequency 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.**
- ☐ Yes ☐ No See Explanation in Exhibit No. EE
- 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 radio frequency electromagnetic exposure in excess of FCC guidelines.
12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).
- ☐ Yes ☐ No ☐ N/A
- Exhibit No.
- An exhibit is required unless this question is not applicable.**
13. **Dispositive Section 307(b) Preference**
- a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?
- ☐ Yes ☐ No
- b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No ☐ N/A
- Exhibit No.
- c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No
- Exhibit No.

Exhibit 5

Description: COMPLIANCE WITH 73.3555

APPLICANT IS THE LICENSEE OF FOUR (4) AM STATIONS AND ONE (1) FM TRANSLATOR STATION IN THE RICHMOND VA NEILSEN RADIO MARKET WHICH HAS AT LEAST 41 FULL POWER COMMERCIAL AND NONCOMMERCIAL RADIO STATIONS - AS THIS MODIFICATION OF LICENSE APPLICATION DOES NOT INVOLVE A CHANGE IN COMMUNITY OF LICENSE OUTSIDE OF THE RICHMOND NEILSEN RADIO MARKET OR AN ADDITIONAL LICENSE, APPLICANT REMAINS COMPLIANT WITH THE APPLICABLE PROVISIONS OF 47 USC 73.3555.

FCC Geographic Market Definition for Richmond, VA

AM/ FM	Freq	Type Station	Format	Home Market	Market			City & State of License	County of License
					Designtn Date	Home Mkt Rank	Owner		
FM	90.1	NC	Chrst/Altve	Richmond, VA	07/02/2003	53	Educational Media Foundation	Colonial Heights, VA	Colonial Heights (City)
FM	93.5	C	Country	Richmond, VA	05/11/2005	53	Denbar Communications Inc	Blackstone, VA	Nottoway
FM	107.3	NC	Nws/Cls/Jaz	Richmond, VA	07/02/2003	53	VPM Media Corporation	Powhatan, VA	Powhatan
FM	106.5	C	HpHop/Rthy	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)
AM	1380	C	Span/Chrst	Richmond, VA	07/02/2003	53	Mountain Broadcasting Corp (NJ)	Richmond, VA	Richmond (City)
AM	1450	C	Adult Hits	Richmond, VA	07/02/2003	53	Mobile Radio Partners Inc	Highland Springs, VA	Henrico
FM	92.1	C	Urban	Richmond, VA	07/02/2003	53	Urban One Inc	Mechanicsville, VA	Hanover
FM	88.9	NC	News	Richmond, VA	07/02/2003	53	VPM Media Corporation	Richmond, VA	Richmond (City)
FM	90.1	NC	Variety	Richmond, VA	07/02/2003	53	University of Richmond	Richmond, VA	Richmond (City)
AM	1290	C	Chrst/Talk	Richmond, VA	07/02/2003	53	Wilkins Communications Network Inc	Colonial Heights, VA	Colonial Heights (City)
AM	1590	NC	AAA	Richmond, VA	07/02/2003	53	Stu-Comm Inc	Richmond, VA	Richmond (City)
AM	1430	C	AAA	Richmond, VA	03/17/2010	53	Stu-Comm Inc	Ashland, VA	Hanover
AM	1340	C	Country	Richmond, VA	07/02/2003	53	Gee Communications Incorporated	Hopewell, VA	Hopewell (City)
FM	91.1	NC	CHR	Richmond, VA	07/02/2003	53	Henrico County Schools	Highland Springs, VA	Henrico
AM	820	C	News/Talk	Richmond, VA	07/02/2003	53	MAGA Radio Network LLC	Chester, VA	Chesterfield
FM	100.5	C	Talk	Richmond, VA	07/02/2003	53	MAGA Radio Network LLC	Goochland, VA	Goochland
FM	100.9	C	Clsc Hits	Richmond, VA	07/02/2003	53	SummitMedia LLC	Lakeside, VA	Henrico
FM	95.3	C	Country	Richmond, VA	07/02/2003	53	SummitMedia LLC	Colonial Heights, VA	Colonial Heights (City)
FM	99.3	C	Urban AC	Richmond, VA	07/02/2003	53	Urban One Inc	Petersburg, VA	Petersburg (City)
FM	105.7	C	Urban AC	Richmond, VA	07/02/2003	53	Urban One Inc	Richmond, VA	Richmond (City)
FM	96.5	C	Clsc Rock	Richmond, VA	07/02/2003	53	SummitMedia LLC	Fort Lee, VA	Prince George
FM	100.3	NC	ChrsContem	Richmond, VA	06/25/2010	53	Educational Media Foundation	Petersburg, VA	Petersburg (City)
AM	590	C	Chrst/Talk	Richmond, VA	12/20/2005	53	Truth Broadcasting Corporation	Bon Air, VA	Chesterfield
FM	98.9	NC	ChrsContem	Richmond, VA	09/15/2004	53	Educational Media Foundation	Midlothian, VA	Chesterfield
FM	104.7	C	Inspiration	Richmond, VA	07/02/2003	53	Urban One Inc	Crewe, VA	Nottoway
AM	990	C	Urban Gosp	Richmond, VA	07/02/2003	53	Radio Richmond LLC	Richmond, VA	Richmond (City)
FM	89.7	NC	Nws/Tlk/Inf	Richmond, VA	07/02/2003	53	Virginia Tech Foundation Incorporated	Charles City, VA	Charles City
AM	910	C	Sprts/Talk	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)
AM	1140	C	News/Talk	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)
FM	94.5	C	CHR	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)
FM	102.1	C	Alternative	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)
AM	1480	C	Mexican	Richmond, VA	09/27/2004	53	Mobile Radio Partners Inc	Glen Allen, VA	Henrico
AM	1240	C	Hip Hop	Richmond, VA	07/02/2003	53	Urban One Inc	Petersburg, VA	Petersburg (City)
FM	98.1	C	Lite AC	Richmond, VA	07/02/2003	53	Audacy	Richmond, VA	Richmond (City)

Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Richmond, VA

AM/ FM	Freq	Station	Type	Format	Home Market	Market		Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
AM	1540	C		Spanish AC	Richmond, VA			07/02/2003	53	Mobile Radio Partners Inc	Sandston, VA	Henrico
FM	103.7	C		Hot AC	Richmond, VA			07/02/2003	53	SummitMedia LLC	Richmond, VA	Richmond (City)
AM	1320	C		Tropical	Richmond, VA			07/02/2003	53	Mobile Radio Partners Inc	Richmond, VA	Richmond (City)
FM	91.3	NC		Jazz/R&BO	Richmond, VA			07/02/2003	53	Virginia State University	Petersburg, VA	Petersburg (City)
FM	93.1	NC		Nws/Cls/Jaz	Richmond, VA			07/02/2003	53	VPM Media Corporation	Eltrick, VA	Chesterfield
AM	950	C		Hip Hop	Richmond, VA			07/02/2003	53	Urban One Inc	Richmond, VA	Richmond (City)
FM	99.9	NC		Christian	Richmond, VA			07/02/2003	53	Bible Broadcasting Network Inc	Ashland, VA	Hanover
Number of Stations in Geographic Market 41												
us Stations in Geographic Market												
FM	107.9	C	AAA		Norfolk-Virginia Beach-Newport News,			01/24/2007	45	Davis Media LLC	West Point, VA	King William

Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FORM 301 EXHIBIT E
WVNZ - FCC Facility # 52050

Minor Modifications Including
Change in City of License
1320 kHz 0.35 kW Day - 0.008 kW Night

This technical report and exhibits are provided in support of an application proposing a change in site, day and night powers and city of license to Ashland, VA as a third local service. §307(b) technical analysis is provided in a separate report.

WVNZ will be combined into the existing WHAN 1430 kHz, 1 kW D tower (ASR #1059230). Appropriate combining and filtering networks will be installed to assure compliance with the Commission's spurious emissions requirements.

Site	N 37-44-47 W 77-29-44 (NAD 27 rounded to nearest second)
Day Power	0.35 kW ND - 332.2 mV/m/km RMS (see E13F)
Night power	0.008 kW ND - 332.2 mV/m/km RMS
Tower	86.3 m AGL - 85.3 m radiator - 135.2° at 1320 kHz

Exhibits:

E13A	Vertical sketch
E13B	Site plat
E13C	Site topographic map
E13D	25 mV/m and 1000 mV/m day contours
E13E	Aerial photographic view of day 1000 mV/m contour
E13F	Antenna efficiency
E13G	ASR#1059230
E14A	Day 5 mV/m
E17A	M-3 allocation plot
E17A1	Licensed overlap from WJKI on 1320 kHz
E17A2	Proposed overlap from WJKI
E17B	Day service contours
E17C	Day allocation listing
E18	Night interference study

Broadcast Engineering Consultants

A vertical sketch is provided as E13A, a site plat as E13B, a site topographic map as E13C and an aerial photograph as E13E with an overlay of the day 1000 mV/m contour. The 1,000 mV/m meter contour contains no population based on the AMPRO 2 calculation and exhibit E-13E clearly demonstrates that the population is less than 300 complying with §73.24(g).

Day allocation analysis:

Exhibit E14A demonstrates §73.24(i) compliance with DAY 5 mV/m coverage of 100% of the population and area of Ashland, VA's 2020 boundary. No night showing for a class D station with secondary night operation is required. All analyses were conducted using V-Soft's AMRPO 2 software. An M3 allocations map is provided as E17A showing only one overlap from co-channel station WJKI. E17A1 and E17A2 show that the overlap received area is decreased from 498 sq km to 331 sq km.

Antenna Efficiency:

The existing 85.3 meter radiator has a ground system that is 0.25λ at 1430 kHz or 52.4 meters. Therefore, the efficiency at 1320 kHz has been determined using the Commission's §73.190, Figure 8 tool to be 332.2 mV/km/kW (see E13F).

Night Allocation Analysis:

A night operating power of 0.008 kW is proposed. Again, AMPRO 2 was utilized to establish the required clearances as demonstrated in exhibits E18.

RF analysis:

The RF contributions of the two proposed facilities at the site were analyzed at a distance of six (6) meters for the existing fence at the tower. Values were determined from OET Bulletin 65, Supplement A figures 1 and 2 and interpolated for the WFCN 1200 kHz and WQZQ 830 kHz tower heights and then adjusted by the square root of the station's power.

Station	Frequency	λ	V/m	% Maximum	A/m	% Maximum
WHAN	1430 kHz	0.407	34.9	5.7	0.065	4.0
WVNZ	1320 kHz	0.376	3.7	0.6	0.010	0.6
Total			39.0	6.3	0.075	4.6

Interpolated values from OET65A Figures 2 and 3 adjusted for power. Maximum values are 614 V/m and 1.63 A/m.

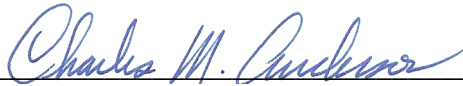
Anderson Associates

Broadcast Engineering Consultants

Clearly, the proposed combined operation meets the maximum permissible values at the existing six (6) meter fence and is compliant.

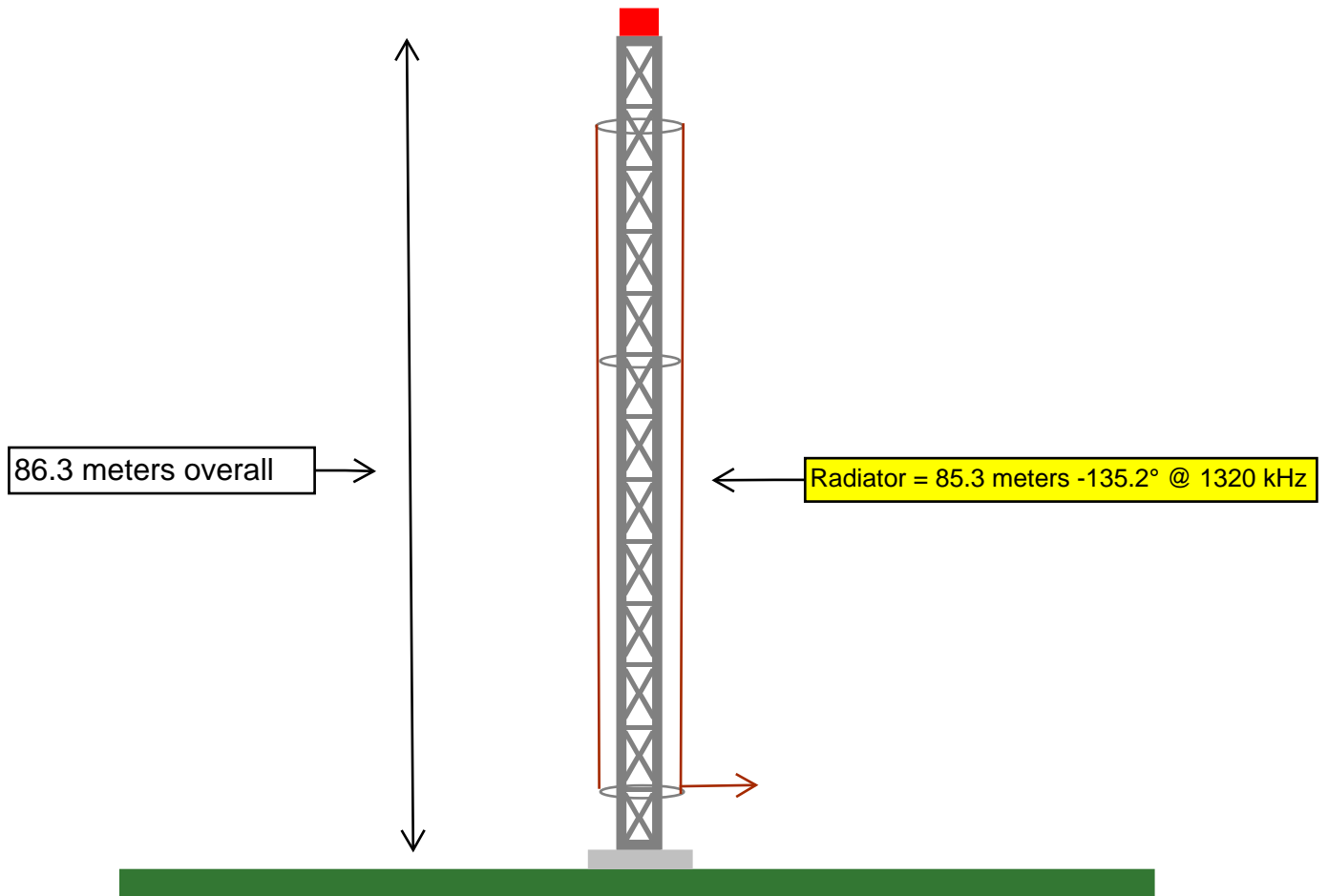
Conclusion:

It is concluded that the proposed WVNZ facility complies with FCC rules and allocation and policies.



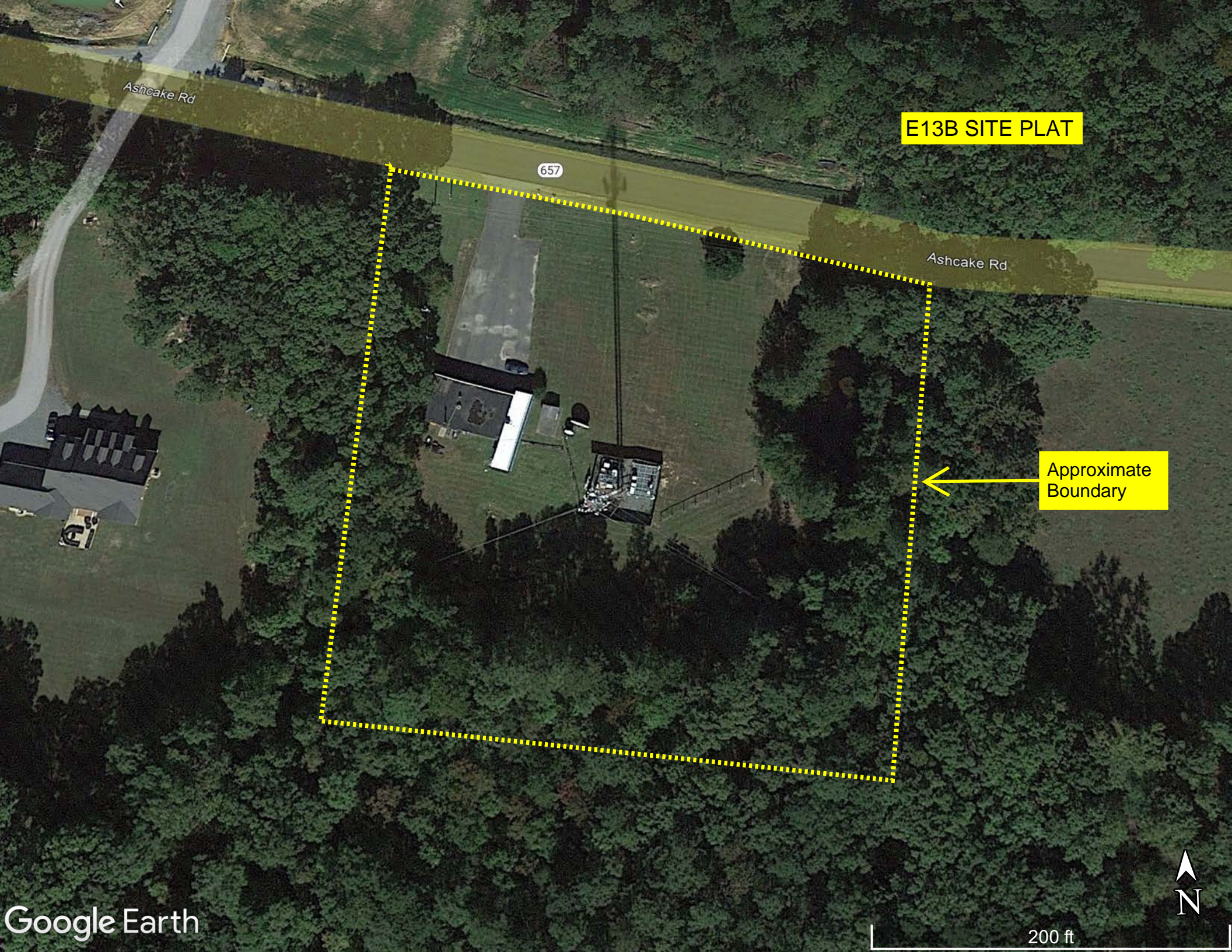
Charles M. Anderson 5-8-2023
270-535-4432
cmanderson43@yahoo.com
www.andersonassociatesradio.com

E13A VERTICAL SKETCH



WVNZ will be combined with WHAN on 1430 kHz, 1 kW Day into its existing 85.3 meters radiator which is 135.2° @ 1320 kHz. The efficiency at 1320 kHz was calculated using the Commissions Figure 8 tool to be 332.2 mV/m/km/kW based on the existing 120 radial 52.4 m ground system.

The tower is a folded unipole feed.



Ashcake Rd

E13B SITE PLAT

657

Ashcake Rd

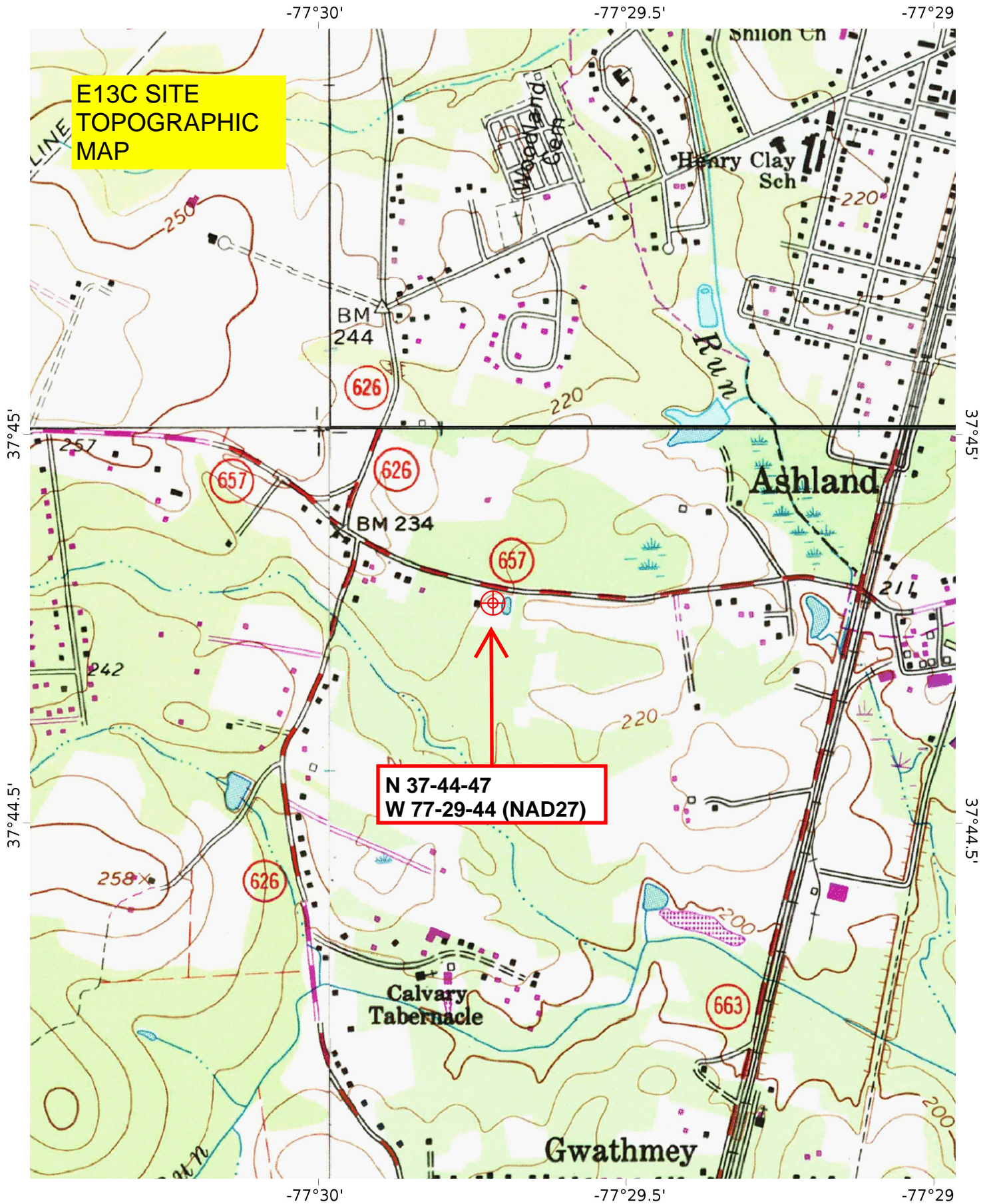
Approximate
Boundary

Google Earth

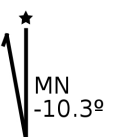
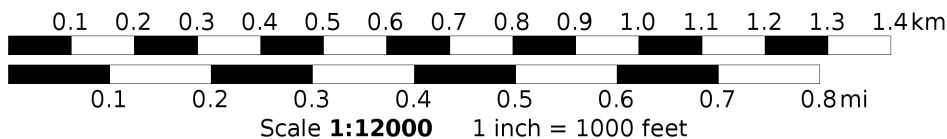
200 ft

N

E13C SITE
TOPOGRAPHIC
MAP



Mercator Projection
WGS84
UTM Zone 18S

WVNZ-AP

Freq: 1320 kHz
Class: D
Latitude: 37-44-46 N
Longitude: 077-29-44 W
Power: 0.35 kW
RMS: 332.2 mV/m @ 1km
Towers: 1

E13D 1000-25 mV/m

Ashland

WVNZ-AP

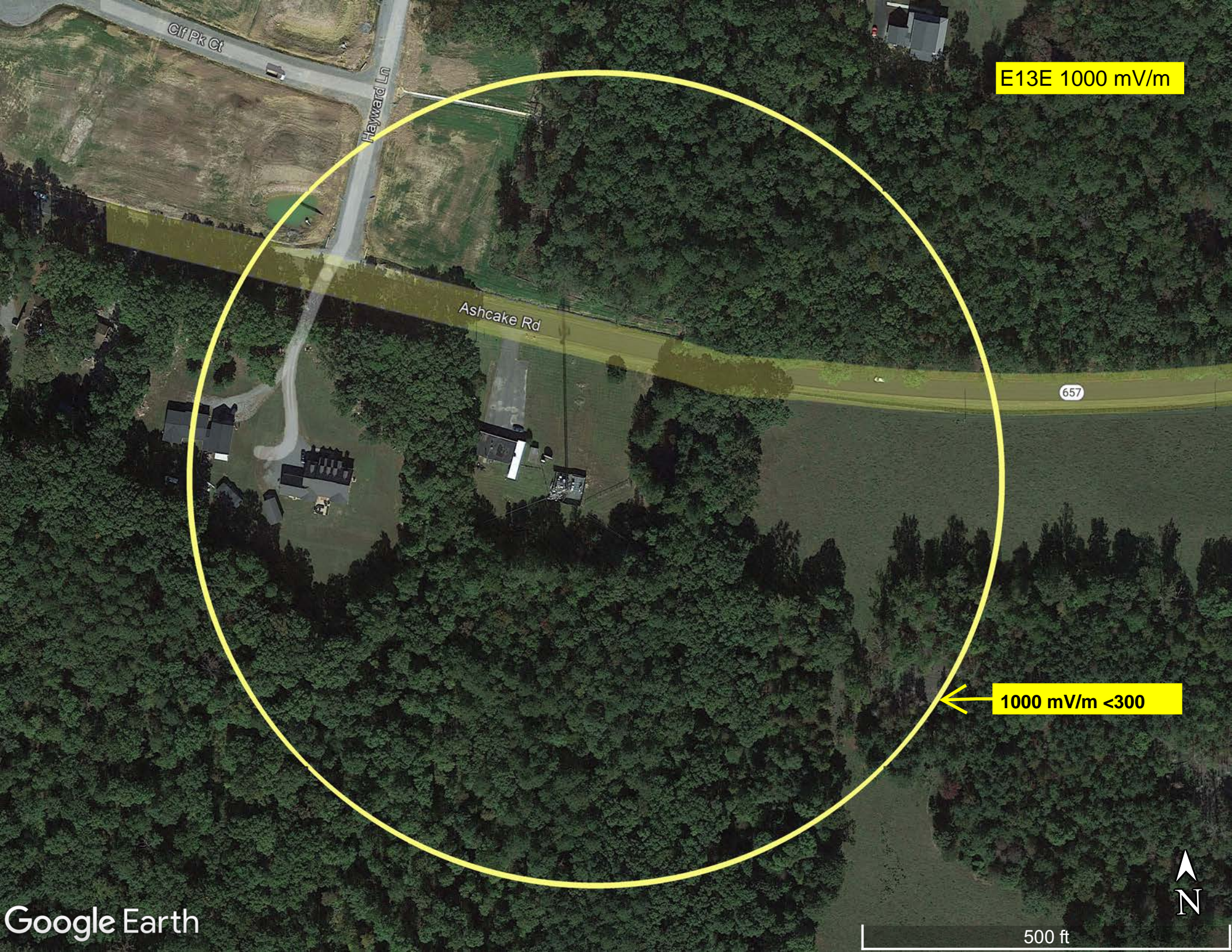


1000 mV/m = 0

25 mV/m Day = 7,677 (2020)

Scale 1:50,000

0 2 4 6 km



E13E 1000 mV/m

Ashcake Rd

657

1000 mV/m <300

E13F

FIGURE 8 calculates the Inverse Distance Field for AM broadcast stations with frequencies between **530** and **1700 kHz**. This calculator is a computer version of Figure 8 of Section 73.190 of the FCC Rules.

The Inverse Distance Fields calculated here are in **mV/m at 1 kilometer**.

[Ground system correction factors](#) may be incorporated into the following results.

Input Parameters

Frequency:	1320 kHz
Number of Ground Radials:	120
Correction for number of radials:	0.0000 mV/m @ 1 kilometer
Average Length of Ground Radials:	52.400 meters 171.916 feet 83.059 degrees 0.2307 wavelengths
Correction factor for length:	-3.2187 mV/m @ 1 kilometer
One Wavelength at 1320 kHz is:	227.116 meters 745.130 feet
Tower Height:	85.300 meters 279.856 feet 135.21 degrees 0.3756 wavelengths

Predicted Field Strength from Figure 8, Section 73.190

(Metric units)

	Theoretical Field	Corrected Field	
At 1.00 kW :	335.450	332.232	mV/m @ 1 KM
At 0.350 kW :	198.455	196.551	mV/m @ 1 KM

E13GRegistration 1059230

 [Map Registration](#)

Registration Detail

Reg Number	1059230	Status	Constructed
File Number	A1220711	Constructed	01/05/2006
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	37-44-47.0 N 077-29-43.0 W	Address	11337 ASHCAKE RD
City, State	ASHLAND , VA		
Zip	23005	County	HANOVER
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
68.6	86.3
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
154.9	85.3

Painting and Lighting Specifications

FCC Paragraphs 1, 3, 11, 21

FAA Notification

FAA Study	79-AEA-229-OE	FAA Issue Date	03/26/1980
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Owner & Contact Information

FRN	0024512105	Owner Entity Type	Limited Liability Company
Assignor FRN	0008904674	Assignor ID	L01095390

Owner

Tarpon Towers II, LLC
Attention To: Todd J Bowman
8916 77th Terrace East
Suite 103
Lakewood Ranch , FL 34202

P: (941)757-5010
F: (941)757-5009
E: tbowman@tarpontowers.com

Contact

Bowman , Todd J
8916 77th Terrace East
Suite 103
P.O. Box 34202
Lakewood Ranch , FL 34202

P: (941)757-5010
F: (941)757-5009
E: tbowman@tarpontowers.com

Last Action Status

Status	Constructed	Received	08/11/2022
Purpose	Change Owner	Entered	08/09/2022

WVNZ-AP

Freq: 1320 kHz
Class: D
Latitude: 37-44-46 N
Longitude: 077-29-44 W
Power: 0.35 kW
RMS: 332.2 mV/m @ 1km
Towers: 1

E14A 5 mV/m Day

5 mV/m Day

**Ashland 2020
Boundary**

WVNZ-AP +

Ashland

Wyndham

Glen Allen

Laurel

Short Pump

Chamberlayne

Mechanicsville

Lakeside

Tuckahoe

East Highland Park

Scale 1:200,000

0 5 10 15 km

WVNZ-AP

Freq: 1320 kHz

Class: D

Latitude: 37-44-47 N

Longitude: 077-29-44 W

Power: 0.35 kW

RMS: 332.2 mV/m @1km

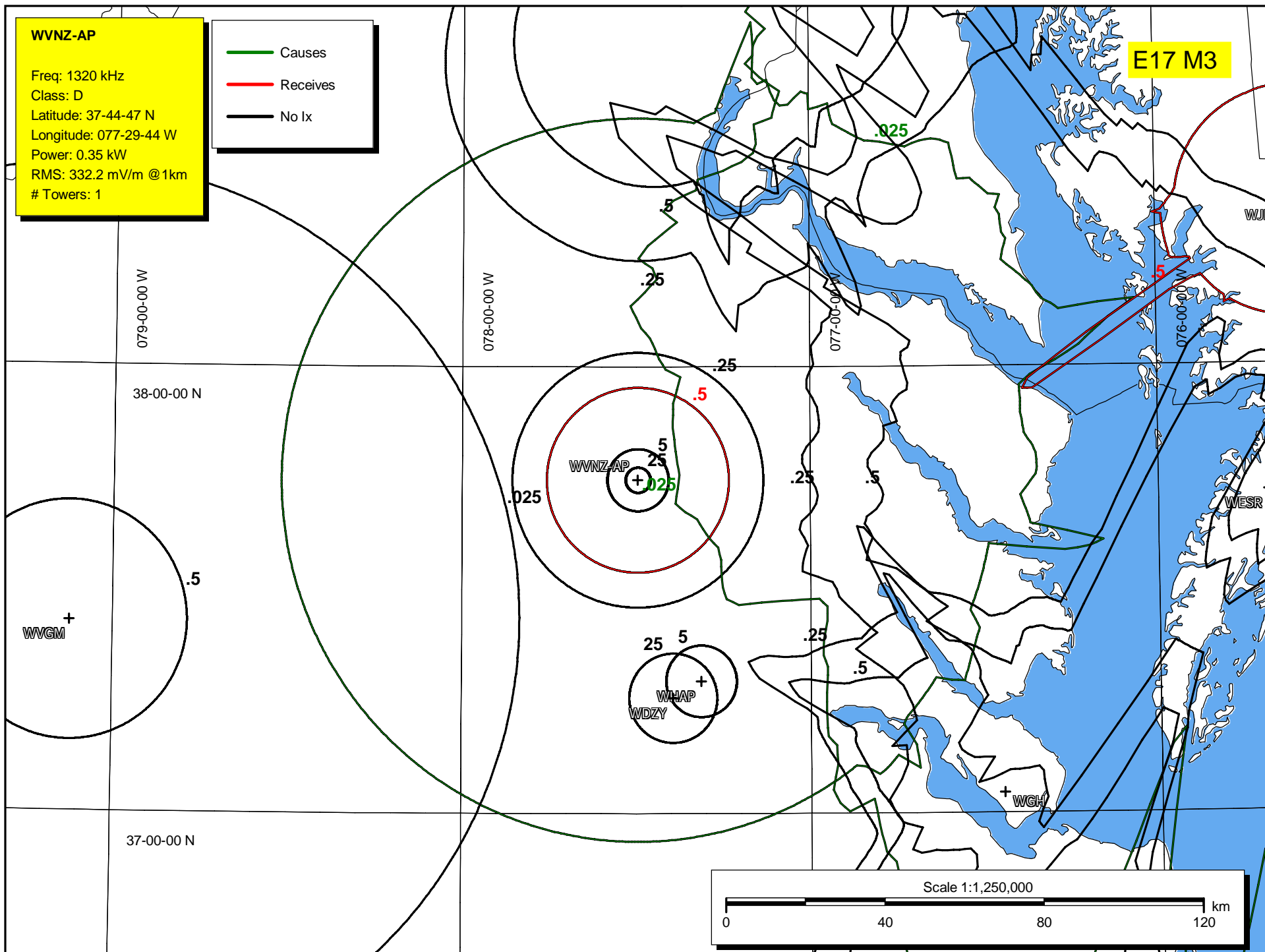
Towers: 1

Causes

Receives

No Ix

E17 M3



E17A1 Licensed Overlaps

Reference Station:

Call: WVNZ

Freq: 1320 kHz

RICHMOND, VA, US

Lat: 37-28-00 N

Power: 5.0 kW

Lng: 077-27-08 W

Theo RMS: 653.23 mV/m @ 1km

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swrch	TL Swrch	A (deg)	B (deg)	C (deg)	D (deg)
--	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
1	1.000	0.0	0.0	0.0	84.5	0	0	0.0	0.0	0.0	0.0
2	0.970	-147.2	100.0	317.0	84.5	0	0	0.0	0.0	0.0	0.0
3	1.065	-38.8	180.0	277.0	84.5	0	0	0.0	0.0	0.0	0.0
4	0.876	-161.7	284.0	290.0	84.5	0	0	0.0	0.0	0.0	0.0

Call	Freq	City	ST	Dist	Azi	In	Out
WGH	1310	NEWPORT NEW	VA	100.6	118.0	2.56	4.13
WHAP	1340	HOPEWELL	VA	22.5	147.1	5.91	5.91
WDZY	1290	COLONIAL HEIG	VA	23.7	167.5	7.54	7.54
WVGM	1320	LYNCHBURG	VA	148.0	267.8	6.34	11.97
WDCT	1310	FAIRFAX	VA	154.3	4.5	28.11	24.92
WESR	1330	ONLEY-ONANC	VA	158.7	80.4	20.02	28.68
WGET	1320	GETTYSBURG	PA	264.4	4.4	84.53	33.26
WRAA	1330	LURAY	VA	160.7	325.1	67.59	59.73
WJKI	1320	SALISBURY	MD	189.5	59.0	-498.00	77.31
WVCV	1340	ORANGE	VA	105.3	325.8	78.31	78.31
WNTX	1350	FREDERICKSBU	VA	93.9	0.7	80.02	80.02
WCOG	1320	GREENSBORO	NC	263.8	235.6	109.11	95.66
WBTM	1330	DANVILLE	VA	200.4	241.0	94.43	96.25
WGPL	1350	PORTSMOUTH	VA	115.7	124.4	99.03	99.03
WHGM	1330	HAVRE DE GRA	MD	260.4	26.9	109.74	112.11

E17A2 Proposed Overlaps

Reference Station:

Call: WVNZ-AP

Freq: 1320 kHz

ASHLAND, VA, US

Lat: 37-44-47 N

Power: 0.35 kW

Lng: 077-29-44 W

Theo RMS: 332.20 mV/m @ 1km

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swch	TL Swch	A (deg)	B (deg)	C (deg)	D (deg)
1	1.000	0.0	0.0	0.0	135.2	0	0	0.0	0.0	0.0	0.0

Call	Freq	City	ST	Dist	Azi	In	Out
WJKI	1320	SALISBURY	MD	178.5	68.1	-331.50	0.00
WVGM	1320	LYNCHBURG	VA	148.1	255.7	10.98	27.99
WESR	1330	ONLEY-ONANC	VA	159.8	91.7	21.11	28.93
WHAP	1340	HOPEWELL	VA	52.5	162.2	35.93	35.93
WDZY	1290	COLONIAL HEIG	VA	54.9	170.7	40.74	40.74
WDCT	1310	FAIRFAX	VA	123.7	7.4	32.52	42.27
WGH	1310	NEWPORT NEW	VA	121.1	130.3	40.73	45.17
WNTX	1350	FREDERICKSBU	VA	63.1	4.5	55.72	55.72
WVCV	1340	ORANGE	VA	78.7	315.5	61.91	61.91
WRAA	1330	LURAY	VA	133.7	319.0	69.53	72.13
WGET	1320	GETTYSBURG	PA	233.8	5.9	91.22	110.48
WHGM	1330	HAVRE DE GRA	MD	234.8	31.1	112.75	123.36

WVNZ-AP

Freq: 1320 kHz
Class: D
Latitude: 37-44-46 N
Longitude: 077-29-44 W
Power: 0.35 kW
RMS: 332.2 mV/m @ 1km
Towers: 1

E17B SERVICE CONTOURS

0.5 mV/m Day

2 mV

5 mV

WVNZ-AP



Scale 1:300,000

0 10 20 30 km

E17C DAY ALLOCATION FACTORS

Reference Station: WVNZ-AP, 1320 kHz Location: 37-44-47 N, 077-29-44 W

*** 1290 kHz (-3) ***

54.9 km WDZY L 37-15-30 N 077-23-40 W 25.0 kW ND1 - 412.0 mV/m@1km
34.1 mi Azi: 170.7 Class: D Sched: U File #: BL19980727AB
Location: COLONIAL HEIGHTS, VA, US

*** 1310 kHz (-1) ***

121.1 km WGH L 37-02-43 N 076-26-54 W 20.0 kW DA2 - 1473.8 mV/m@1km
75.2 mi Azi: 130.3 Class: B Sched: U File #: BL20030417ACK
Location: NEWPORT NEWS, VA, US
123.7 km WDCT L 38-51-08 N 077-18-57 W 5.0 kW DA2 - 695.2 mV/m@1km
76.9 mi Azi: 7.4 Class: B Sched: U File #: BL10740
Location: FAIRFAX, VA, US

*** 1320 kHz (CO) ***

148.1 km WVGM L 37-25-37 N 079-07-26 W 1.0 kW ND1 - 344.4 mV/m@1km
92.0 mi Azi: 255.7 Class: D Sched: U File #: BL19800319AG
Location: LYNCHBURG, VA, US
178.5 km WJKI L 38-21-39 N 075-37-00 W 1.0 kW ND1 - 310.6 mV/m@1km
110.9 mi Azi: 68.1 Class: D Sched: U File #: BL19830131AD
Location: SALISBURY, MD, US
233.8 km WGET L 39-50-30 N 077-13-25 W 1.0 kW DA2 - 313.8 mV/m@1km
145.3 mi Azi: 5.9 Class: B Sched: U File #: BL5810
Location: GETTYSBURG, PA, US

*** 1330 kHz (+1) ***

133.7 km WRAA L 38-39-34 N 078-29-28 W 1.0 kW ND2 - 345.2 mV/m@1km
83.1 mi Azi: 319.0 Class: D Sched: U File #: BML20190424ABK
Location: LURAY, VA, US
159.8 km WESR L 37-43-02.20 N 075-40-59.70 W 5.0 kW ND2 - 362.1 mV/m@1km
99.3 mi Azi: 91.7 Class: D Sched: U File #: BML20150923AMS
Location: ONLEY-ONANCOCK, VA, US

*** 1340 kHz (+2) ***

52.5 km WHAP L 37-17-46 N 077-18-50 W 1.0 kW ND1 - 299.3 mV/m@1km
32.6 mi Azi: 162.2 Class: C Sched: U File #: BL11117
Location: HOPEWELL, VA, US
78.7 km WVCV L 38-15-14 N 078-07-15 W 1.0 kW ND1 - 305.8 mV/m@1km
48.9 mi Azi: 315.5 Class: C Sched: U File #: BL14490
Location: ORANGE, VA, US

*** 1350 kHz (+3) ***

63.1 km WNTX L 38-18-46 N 077-26-20 W 1.0 kW ND1 - 370.1 mV/m@1km
39.2 mi Azi: 4.5 Class: D Sched: U File #: BL19881227AC
Location: FREDERICKSBURG, VA, US

E18 Night Allocation Protection Report

Call: WVNZ-AP
Freq: 1320 kHz
ASHLAND, VA, US
Hours: N
Lat: 37-44-47 N [NAD27]
Lng: 077-29-44 W
Power: 0.008 kW
Theo RMS: 332.20 mV/m @ 1km @ 1kW

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Switch	TL Switch	A (deg)	B (deg)	C (deg)	D (deg)
1	1.000	0.0	0.0	0.0	135.2	0	0	0.0	0.0	0.0	0.0

Call Letters	Ct	St	City	SWFF (100uV/m)	Req Prot (mV/m)	Permis (mV/m)	Cur Rad (mV/m)	Margin (mV/m)
WJAS	US	PA	PITTSBURGH	165.73	0.898	27.09	25.74	1.35
50% = 2.417, 25% = 3.607; CJMR/ =2.03 KWHN=1.31 WCVG=1.18 WCOG=1.13 WARA=0.98 KSIV=0.97 WILS=0.95 WDER=0.94 HJPC-A=0.90								
WCOG	US	NC	GREENSBORO	227.14	2.767	60.91	23.31	37.60
50% = 8.28, 25% = 11.068; WJAS=8.28 WGOC=4.01 WGET=3.38 WATR=2.99 WISW=2.98 WOBL=2.94								
WTKZ	US	PA	ALLENTOWN	169.11	2.899	85.72	25.59	60.13
50% = 9.844, 25% = 11.597; WJAS=7.74 WATR=6.08 CJMR/ =4.41 WGET=4.26								
WISW	US	SC	COLUMBIA	110.82	2.028	91.52	27.76	63.76
50% = 6.253, 25% = 8.114; WJAS=3.24 WCOG=3.20 WGOC=3.11 WYRD=2.96 KXYZ=2.80 WCVG=2.27 WATR=2.18 WISE=2.14 WGET=2.10								
WATR	US	CT	WATERBURY	92.66	1.806	97.42	28.06	69.36
50% = 6.271, 25% = 7.222; WJAS=3.90 WARA=3.83 WDER=3.08 WGET=2.65 CJMR/ =2.41								
WGET	US	PA	GETTYSBURG	260.96	4.949	94.82	21.44	73.37
50% = 19.795, 25% = 19.795; WJAS=19.80								
WARA	US	MA	ATTLEBORO	66.71	1.655	124.03	28.71	95.32
50% = 5.752, 25% = 6.749; WDER=3.54 WATR=3.51 WJAS=2.87 WGET=1.88 WISW=1.80 1320CJSO/ =1.72 WLQY=1.65								
WOBL	US	OH	OBERLIN	94.76	2.513	132.57	28.01	104.56
50% = 9.353, 25% = 10.05; WJAS=9.35 CJMR/ =3.68								

**WVNZ
307(b) TECHNICAL REPORT**

**City of License Change to
Ashland, VA**

This technical report has been developed in support of an application for minor modifications to station WVNZ(AM) (facility ID #52050) including a request to change city of license from Richmond, VA (226,610), to Ashland, VA (7,565 - 2020 U.S. Census) as a third licensed aural service.

The change in city of license is required due to the loss of the licensed site. It is not financially feasible to develop a new site. Thus the relocation to another existing AM site is the only viable means of preserving this AM service.

Proposed service contours population and area (2020 U.S. Census):

Day 0.5 mV/m = 477,236/ 1,661.9 sq km

Day 2 mV/m = 98,537/ 458.7 sq km

Day 5 mV/m = 23,936/ 187.5 sq km

Urbanized area analysis (exhibit A):

Neither the licensed WVNZ Day facility nor the proposed WVNZ Day facility encompasses 50% of the Richmond, VA 2020 Urbanized Area. The licensed facility encompasses 37.1% of the UA area and the proposed facility only 3.5% of the UA. Both the licensed community of Richmond and the proposed community of Ashland are located within the Richmond Urbanized Area. Therefore, an urbanized area issue is not triggered.

Gain - Loss area (exhibits B and C):

The proposed 2 mV/m day contour yields a population of 98,537 (2020 U.S. Census data) with

a net loss of 677,113 and a net loss area of 666.3 sq km. See exhibit B.

Exhibit C demonstrate that the 2 mV/m loss area will continue to receive at least twenty (20) aural services and the gain area will receive new 16th-19th service to a population of 2,816 and 20 or more services to a population of 14,746. There are clearly no 1st or 2nd aural service issues.

Reception services (exhibits D and E):

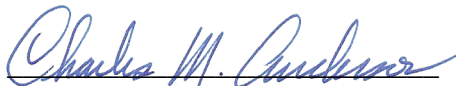
Richmond will continue to receive thirty-seven (37 - 17 FM and 10AM) AM 2 mV/m Day or FM 60 dBu to 80% of the area or population representing a net loss of one (1). Ashland, VA will gain one AM Day service from WVNZ resulting in a total of twenty-two (22 - 15 FM and 7 AM).

Reduction of Interference:

The modification to WVNZ will result in a significant reduction of received co-channel interference (0.025 mV/m to 0.5 mV/m overlap) from AM station WJKI from 498 sq km to 331 sq km.

Conclusion:

It is concluded that the change in city of license for WVNZ to Ashland, VA results in a preferential arrangement of allotments by providing a 3rd licensed service to Ashland (7,565) which is now served by WYFJ(FM) and daytime WHAN(AM) while Richmond retains local licensed service from sixteen (16) stations (9 FMs + 7 AMs), significantly reducing AM received interference and preserving an AM service that would otherwise be lost.


Charles M. Anderson 5-7-2023
5900 Lake Cyrus Drive
Hoover, AL 35244
270-535-4432
cmanderson43@yahoo.com

WVNZ-WHAN

Freq: 1320 kHz
Class: D
Latitude: 37-44-46 N
Longitude: 077-29-44 W
Power: 0.35 kW
RMS: 332.2 mV/m @1km
Towers: 1
Augs: 0

EXHIBIT A URBANIZED AREA

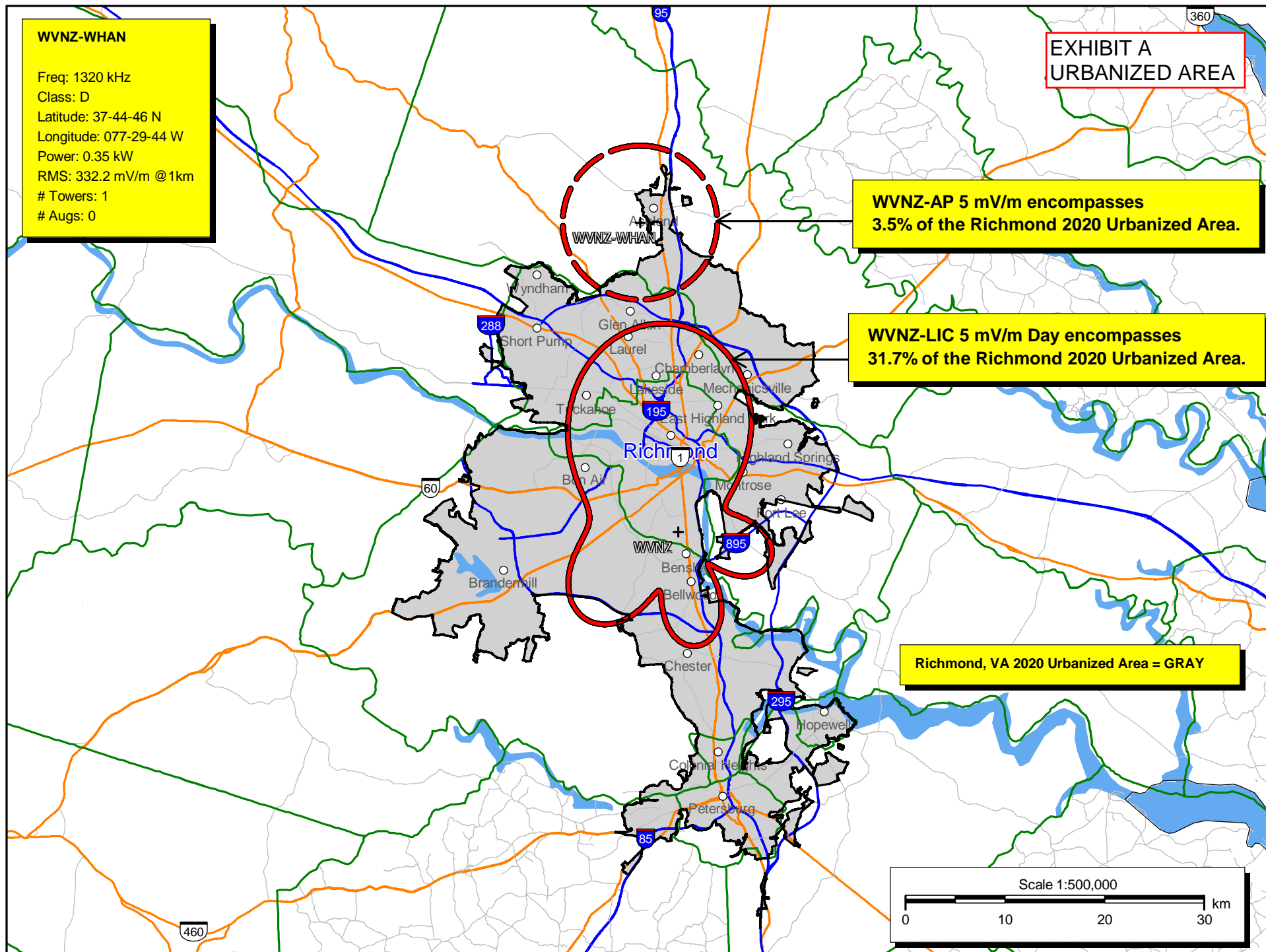
WVNZ-AP 5 mV/m encompasses
3.5% of the Richmond 2020 Urbanized Area.

WVNZ-LIC 5 mV/m Day encompasses
31.7% of the Richmond 2020 Urbanized Area.

Richmond, VA 2020 Urbanized Area = GRAY

Scale 1:500,000

0 10 20 30 km



WVNZ-AP

Freq: 1320 kHz
Class: D
Latitude: 37-44-46 N
Longitude: 077-29-44 W
Power: 0.35 kW
RMS: 332.2 mV/m @ 1km
Towers: 1

EXHIBIT B GAIN-LOSS

WVNZ-AP 2 mV/m Day
Gain Area = Green = 14,746/ 257.5 sq km

WVNZ-LIC 2 mV/m Day
Loss Area = RED = 691,859/ 923.8 sq km
Net = -677,113/ - 666.3 sq km

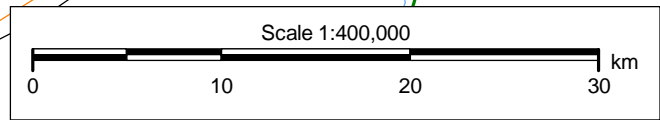


EXHIBIT C
GAIN-LOSS
SERVICES
 FM 60 dBu - Red
 AM 2 mV/m D - Acqua

Service Gain/Loss Population Report
 Population Database: 2020 US Census (PL)

Proposed: Service Count: WVNZ-AP 2.0 mV/m
 Existing: Service Count: WVNZ-LIC 2.0 mV/m

Gain Area Total Population: 17,562
 Loss Area Total Population: 691,859
 Common Area Total Population: 83,791

Net Gain in Total Population: -674,297

Services	Gain	Loss	Net Gain
1	0	0	0
2	0	0	0
3	0	0	0
4	0	0	0
5	0	0	0
6	0	0	0
7	0	0	0
8	0	0	0
9	0	0	0
10	0	0	0
11	0	0	0
12	0	0	0
13	0	0	0
14	0	0	0
15	0	0	0
16	147	0	147
17	348	0	348
18	2,108	0	2,108
19	213	0	213
20+	14,746	691,859	-677,113

Service Count

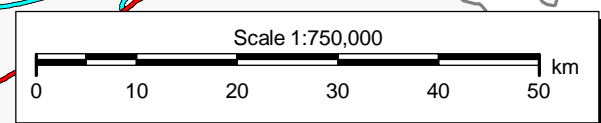
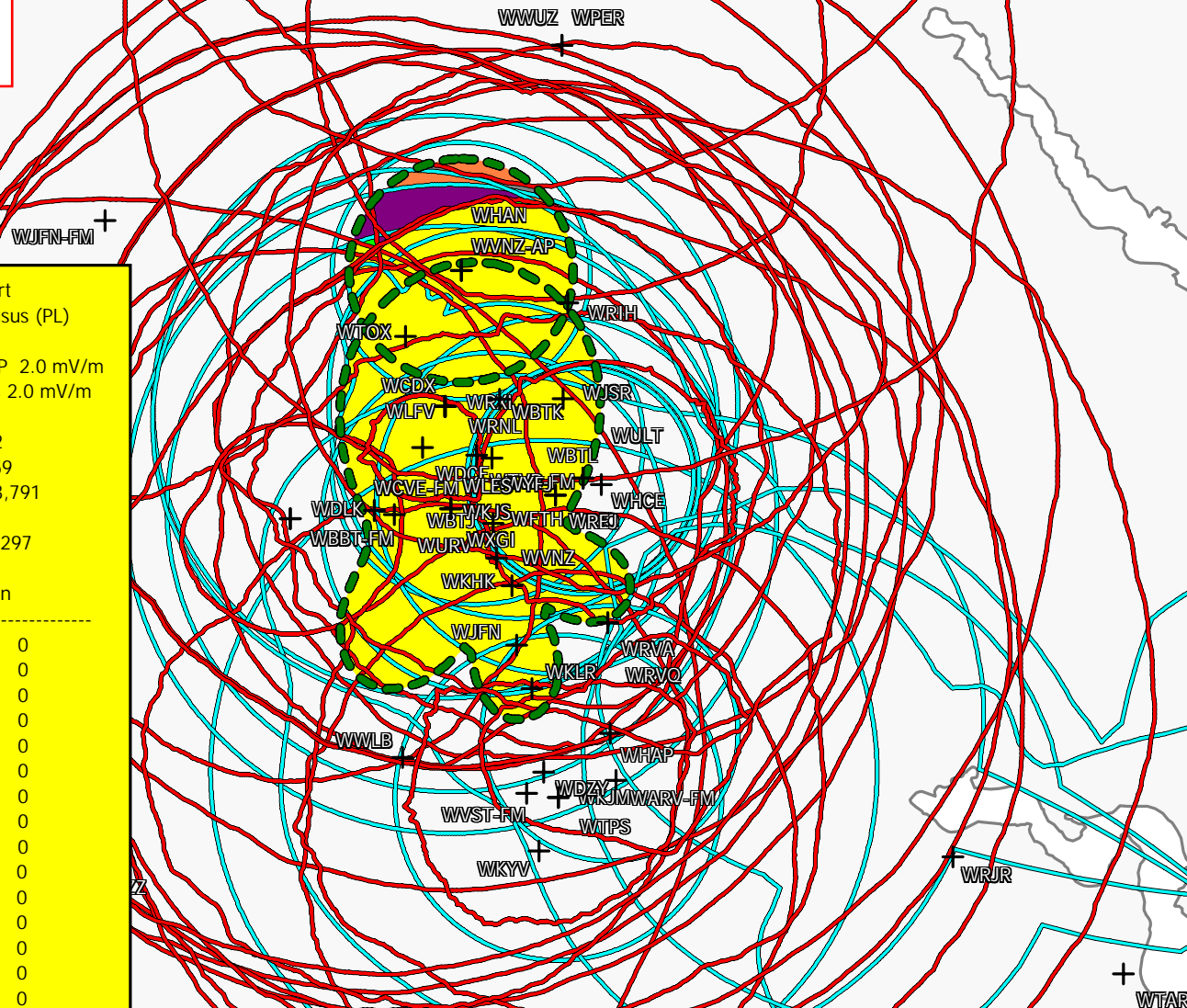


EXHIBIT C1 - Services Stations

Call	Sign	Lic	Chan.	Svc	Cl s	City	ST	DA	Power
-----	-----	-----	-----	-----	-----	-----	--	--	-----
WVNZ	AP		1320	M	D	Ashland	VA	No	0.35
WVNZ	LIC		1320	M	D	Richmond	VA	Yes	5.0
WRIH	LIC		201	M	B1	Richmond	VA	Yes	5.0
WCVE-FM	LIC		205	M	B	Richmond	VA	No	10.0
WRIQ	LIC		209	M	B	Charles City	VA	Yes	27.0
WARV-FM	LIC		211	M	A	Colonial Heights	VA	Yes	0.56
WDCE	LIC		211	M	A	Richmond	VA	No	0.1
WPER	LIC		213	M	B	Fredericksburg	VA	No	47.0
WDLK	LIC		215	M	A	Woodlake	VA	Yes	0.032
WHCE	LIC		216	M	A	Highland Springs	VA	No	3.0
WVST-FM	LIC		217	M	A	Petersburg	VA	Yes	2.2
WCDX	LIC		221	M	B1	Mechanicsville	VA	No	4.5
WWLB	LIC		226	M	A	Ettrick	VA	No	5.2
WFLS-FM	LIC		227	M	B	Fredericksburg	VA	No	50.0
WRVQ	LIC		233	M	B	Richmond	VA	No	200.0
WKHK	LIC		237	M	B	Colonial Heights	VA	No	47.0
WKLR	LIC		243	M	B	Fort Lee	VA	No	50.0
WWUZ	LIC		245	M	A	Bowling Green	VA	No	2.95
WTVR-FM	LIC		251	M	B	Richmond	VA	No	50.0
WLFV	LIC		255	M	B1	Midlothian	VA	Yes	4.8
WKJM	LIC		257	M	A	Petersburg	VA	Yes	6.0
WYFJ	LIC		260	M	A	Ashland	VA	No	6.0
WKYV	LIC		262	M	A	Petersburg	VA	No	4.5
WJFN-FM	LIC		263	M	A	Goochland	VA	No	2.6
WJSR	LIC		265	M	B1	Lakeside	VA	No	15.0
WRXL	LIC		271	M	B	Richmond	VA	No	20.0
WURV	LIC		279	M	B	Richmond	VA	No	20.0
WPZZ	LIC		284	M	C1	Crewe	VA	Yes	100.0
WKJS	LIC		289	M	A	Richmond	VA	No	2.3
WBTJ	LIC		293	M	B	Richmond	VA	Yes	14.5
WBBT-FM	LIC		297	M	A	Powhatan	VA	No	1.4
WTAR			850			NORFOLK	VA		
WRJR			670			CLAREMONT	VA		
WRVA			1140			RI CHMOND	VA		
WHAP			1340			HOPEWELL	VA		
WULT			1540			SANDSTON	VA		
WBTL			1450			HIGHLAND SPRINGS	VA		
WJFN			820			CHESTER	VA		
WFTH			1590			RI CHMOND	VA		
WLES			590			BON AIR	VA		
WBTk			1380			RI CHMOND	VA		
WDZY			1290			COLONIAL HEIGHTS	VA		
WTPS			1240			PETERSBURG	VA		
WXGI			950			RI CHMOND	VA		
WRNL			910			RI CHMOND	VA		
WREJ			990			RI CHMOND	VA		
WHAN			1430			ASHLAND	VA		
WTOX			1480			GLEN ALLEN	VA		

EXHIBIT D - Ashland, VA Reception Services - 22 (15 FM + 7 AM) +1

FM Stations Serving Ashland, VA (15):

Call Sign	Principal City	State	Frequency (MHz)	FCC Facility ID
WRXL	Richmond	VA	102.1	11961
WTVR-FM	Richmond	VA	98.1	54387
WRIH	Richmond	VA	88.1	87808
WCDX	Mechanicsville	VA	92.1	60473
WLFV	Midlothian	VA	98.9	54872
WJSR	Lakeside	VA	100.9	27439
WURV	Richmond	VA	103.7	37230
WPER	Fredericksburg	VA	90.5	18852
WCVE-FM	Richmond	VA	88.9	10016
WBTJ	Richmond	VA	106.5	74168
WKHK	Colonial Heights	VA	95.3	319
WRVQ	Richmond	VA	94.5	11963
WYFJ	Ashland	VA	99.9	5096
WKLR	Fort Lee	VA	96.5	71330
WKJS	Richmond	VA	105.7	3725

AM Stations Serving Ashland, VA (6 + WVNZ = +1):

Call Sign	Principal City	State	Frequency (kHz)	FCC Facility ID
WHAN	Ashland	VA	1430	8438
WRNL	Richmond	VA	910	11960
WBTk	Richmond	VA	1380	57831
WLES	Bon Air	VA	590	72504
WRVA	Richmond	VA	1140	11914
WXGI	Richmond	VA	950	74207

Information obtained from V-Soft Communications ZIP Code program.

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EXHIBIT E Richmond, VA Reception Services = 37 (17 FM + 10 AM) -1

FM Stations Serving Richmond, VA (17) – 60 dBu 80% POP or Area:

Call Sign	Principal City	State	Frequency (MHz)	FCC Facility ID
WTVR-FM	Richmond	VA	98.1	54387
WYFJ	Ashland	VA	99.9	5096
WRXL	Richmond	VA	102.1	11961
WURV	Richmond	VA	103.7	37230
WRIQ	Charles City	VA	89.7	82970
WKJS	Richmond	VA	105.7	3725
WKHK	Colonial Heights	VA	95.3	319
WCDX	Mechanicsville	VA	92.1	60473
WBTJ	Richmond	VA	106.5	74168
WLFV	Midlothian	VA	98.9	54872
WCVE-FM	Richmond	VA	88.9	10016
WJSR	Lakeside	VA	100.9	27439
WRVQ	Richmond	VA	94.5	11963
WKLR	Fort Lee	VA	96.5	71330
WRIH	Richmond	VA	88.1	87808
WPZZ	Crewe	VA	104.7	321
WBBT-FM	Powhatan	VA	107.3	31859

AM Stations Service Richmond, VA (11- WVNZ) 2 mV-Day 80% POP or Area:

Call Sign	Principal City	State	Frequency (kHz)	FCC Facility ID
WXGI	Richmond	VA	950	74207
WLES	Bon Air	VA	590	72504
WVNZ	Richmond	VA	1320	52050
WRNL	Richmond	VA	910	11960
WFTH	Richmond	VA	1590	67683
WBTK	Richmond	VA	1380	57831
WRVA	Richmond	VA	1140	11914
WREJ	Richmond	VA	990	50401
WTOX	Glen Allen	VA	1480	129524
WJFN	Chester	VA	820	27440
WDZY	Colonial Heights	VA	1290	21723

Exhibit 21

Background: This application proposes, inter alia, to modify the existing licensed facility¹ and implement a minor change to the facilities of AM Station WVNZ (the “Station”), including a change in the community of license;

Section III-A, Item 12, FCC Form 301-AM: Community of License Change - Section 307(b). If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of station assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).

47 USC 307(b) Allocation of facilities:

In considering applications for licenses, and modifications and renewals thereof, when and insofar as there is demand for the same, the Commission shall make such distribution of licenses, frequencies, hours of operation, and of power among the several States and communities as to provide a fair, efficient, and equitable distribution of radio service to each of the same.

This Exhibit 21 and attachments constitute the exhibit required by the form instructions and applicable FCC Rules.

Discussion:

The instant application is being filed pursuant to the provisions of Section 73.3571(j) of the Commission’s Rules. The application specifies a new community of license (**Ashland, VA**) which is within the Richmond “urbanized area”. The current community of license for the facility is Richmond, Virginia.

Ordinarily, a change of community of license would require a specific showing² in accordance with the Commission’s *Rural Radio Order*³ to justify a change of community of license. However, it should be noted that this application is consistent with *Gearhart, Madras, Manzanita, and Seaside, Oregon*,⁴ because the application involves an intra-urbanized move within the Richmond Urbanized Area, and because it advances Priority (4), other public interest matters. As stated by staff in *Gearhart*, “there is no need for a

¹ Concurrent with this Application, WVNZ is dismissing BP-20210617AAA, which had sought a minor modification to a triplex facility but is no longer technically viable option (the “Prior Modification”)

² See *Faye and Richard Tuck, Inc.*, Memorandum Opinion and Order, 3 FCC Rcd 5374, 5378 (1978_ (“*Tuck*”) (establishing eight factors to determine whether a suburban community is independent of a nearby central city)

³ See *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order On Reconsideration, and Second Further Notice of Proposed Rule Making, 26 FCC Rcd 2556, 2577 (2011) (subsequent history omitted) (“*Rural Radio*”)

⁴ Report and Order, 26 FCC Rcd 10259 (MB 2011) (“*Gearhart*”) (*Tuck* analysis not required for a station changing community of license within the same Urbanized Area, and absent a compelling showing to claim a Priority (3) preference, the Commission will consider the proposal under Priority (4))

Tuck showing where both the station's current and proposed communities of license are located within an Urbanized Area because such intra-urbanized moves do not present the same concerns as rural to urban moves.”⁵

Since both communities are within the well-served Richmond Urbanized Area, as has been shown in the BIA Market Report included as **Attachment “A”** to this Exhibit evidencing **41** commercial and non-commercial stations serving the Richmond market, the population data (*Section III-A, Item 12 Instructions, FCC Form 301-AM, subparagraphs 1-5*) is not germane to this required exhibit.

Subparagraph 6 of Item 12 of the *Instructions* is inapplicable because the proposed community of license already has two (2) licensed services and WVNZ would be the third (3rd) aural service to Ashland; Subparagraph 7 is also inapplicable because this would not be first local service to Ashland.

As noted above, the new proposed community of license is within the Richmond Urbanized Area, as shown on the map included as **Attachment “B”**. The applicant therefore is not proposing changes in facilities of the station to a “newly served” urbanized area such that the provisions of SubParagraph 8 apply.

With respect to Subparagraphs 9 and 10, the application is proposing modifications that that provide reduction in interference as described below and is not adding or reducing third, fourth or fifth services to the urbanized area, so the population data described in these paragraphs is not germane to the question of Priority (4), other public interest matters.⁶

As to the public interest matters addressed by the instant application, the proposal resolves or reduces the following interference:

Reduction of existing interference received from WJKI, Salisbury, MD co-channel 0.025-to-0.5 mV/m overlap from 498 to 331 square kilometers.

There are no white or gray areas created or reduced by this proposal.

⁵ See *Gearhart*, at ¶ 9.

⁶The proposal would replace a multiplicity of services to Richmond with third local service to Ashland. However, since Ashland is within the Richmond Urbanized Area, the application should be considered to be one of the very large number of services to that Area, per the “urbanized service area presumption.”

Populations:

	0.5 mV/m	2 mV/m	5 mV/m
Licensed:	1,014,486	775,650	403,210
Proposed:	477,236	98,537	23,936

While this proposed modification does result in a loss of population coverage overall in the UA, it also results in an increase in number of services to Ashland, VA. The current WVNZ licensed daytime 2 mV/m covers only 63.2% of Ashland's population and 66.2% of its area without any daytime 5 mV/m coverage. The proposed facility will add new city grade 5 mV/m coverage to Ashland and become the 3rd local service to Ashland, adding new 16th-19th service to a population of 2,816 and 20 or more services to a population of 14,746.

The instant proposal permits WVNZ to maintain operations for this facility, which has been necessitated by the loss of lease of the currently licensed WVNZ site (see BML-19790425AD) in South Richmond near Transport Street, where it has been located since the mid 1970's⁷. WVNZ is currently operating via an STA from a leased site used by co-owned WTOX, however the WTOX site lease has also been terminated by Henrico County in order to develop the property, and thus both WVNZ and WTOX have to relocate, meaning WVNZ requires a Construction Permit in order to obtain new permanent licensed facility to ensure continued service to the citizens of the Richmond urbanized area, including Ashland's third local service. WVNZ has exhausted all collocation options elsewhere in the Richmond UA and the proposed collocation with WHAN Ashland is its last best hope to preserve its service to the Richmond UA community.

The applicant shall comply with the local public notice provisions of § § 73.3580 (c)(3), 73.3580(d)(3), and 73.3580 (f) for this application.

⁷ See BP-19,516, 10-3-1973 in WVNZ History Cards

ATTACHMENT "A"



FCC Geographic Market Definition for Richmond, VA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WARV	FM	100.3	C	Country	Richmond, VA	Richmond, VA	07/02/2003	54	Educational Media Foundation	Petersburg, VA	Petersburg (City)
WBBC	FM	93.5	C	Country	Richmond, VA	Richmond, VA	05/11/2005	54	Denbar Communications Inc	Blackstone, VA	Nottoway
WBBT	FM	107.3	C	Cisc Hits	Richmond, VA	Richmond, VA	07/02/2003	54	Alpha Media	Powhatan, VA	Powhatan
WBTJ	FM	106.5	C	HpHop/Rhy	Richmond, VA	Richmond, VA	07/02/2003	54	iHeartMedia	Richmond, VA	Richmond (City)
WBTk	AM	1380	C	Span/Chrst	Richmond, VA	Richmond, VA	07/02/2003	54	Mountain Broadcasting Corp (NJ)	Richmond, VA	Richmond (City)
WCDX	FM	92.1	C	Urban	Richmond, VA	Richmond, VA	07/02/2003	54	Radio One Inc	Mechanicsville, VA	Hanover
WCLM	AM	1450	C	R&BOd/Talk	Richmond, VA	Richmond, VA	07/02/2003	54	World Media Broadcast Company	Highland Springs, VA	Henrico
WCVE	FM	88.9	NC	Nws/Cls/Jaz	Richmond, VA	Richmond, VA	07/02/2003	54	Commonwealth Public Broadcasting Corporation	Richmond, VA	Richmond (City)
WDCE	FM	90.1	NC	Variety	Richmond, VA	Richmond, VA	07/02/2003	54	University of Richmond	Richmond, VA	Richmond (City)
WDZY	AM	1290	C	Chrst/Talk	Richmond, VA	Richmond, VA	07/02/2003	54	Wilkins Communications Network Inc	Colonial Heights, VA	Colonial Heights (City)
WFTH	AM	1590	C	AAA	Richmond, VA	Richmond, VA	07/02/2003	54	Stu-Comm Inc	Richmond, VA	Richmond (City)
WHAN	AM	1430	C	Variety	Richmond, VA	Richmond, VA	03/17/2010	54	Fifth Estate Broadcasting LLC	Ashland, VA	Hanover
WHAP	AM	1340	C	Cst/Spt/Var	Richmond, VA	Richmond, VA	07/02/2003	54	WHAP Inc	Hopewell, VA	Hopewell (City)
WHCE	FM	91.1	NC	CHR	Richmond, VA	Richmond, VA	07/02/2003	54	Henrico County Schools	Highland Springs, VA	Henrico
WJSR	FM	100.9	C	Cisc Hits	Richmond, VA	Richmond, VA	07/02/2003	54	SummitMedia LLC	Lakeside, VA	Henrico
WKHK	FM	95.3	C	Country	Richmond, VA	Richmond, VA	07/02/2003	54	SummitMedia LLC	Colonial Heights, VA	Colonial Heights (City)
WKJM	FM	99.3	C	Urban AC	Richmond, VA	Richmond, VA	07/02/2003	54	Radio One Inc	Petersburg, VA	Petersburg (City)
WKJS	FM	105.7	C	Urban AC	Richmond, VA	Richmond, VA	07/02/2003	54	Radio One Inc	Richmond, VA	Richmond (City)
WKLR	FM	96.5	C	Cisc Rock	Richmond, VA	Richmond, VA	07/02/2003	54	SummitMedia LLC	Fort Lee, VA	Prince George
WKYV	FM	90.1	NC	ChrsContem	Richmond, VA	Richmond, VA	06/25/2010	54	Educational Media Foundation	Colonial Heights, VA	Colonial Heights (City)
WLES	AM	590	C	Chrst/Talk	Richmond, VA	Richmond, VA	12/20/2005	54	Chesapeake-Portsmouth Broadcasting	Bon Air, VA	Chesterfield
WLFV	FM	98.9	C	Country	Richmond, VA	Richmond, VA	09/15/2004	54	Educational Media Foundation	Midlothian, VA	Chesterfield
WLRB	FM	100.5	C	Sports	Richmond, VA	Richmond, VA	07/02/2003	54	Educational Media Foundation	Goochland, VA	Goochland
WLRJ	FM	89.7	NC	ChrsContem	Richmond, VA	Richmond, VA	07/02/2003	54	p Educational Media Foundation	Charles City, VA	Charles City
WNTW	AM	820	C	News/Talk	Richmond, VA	Richmond, VA	07/02/2003	54	Delmarva Educational Association	Chester, VA	Chesterfield
WONA	AM	1540	C	DARK	Richmond, VA	Richmond, VA	07/02/2003	54	Delmarva Educational Association	Richmond, VA	Richmond (City)
WPZZ	FM	104.7	C	Inspiration	Richmond, VA	Richmond, VA	07/02/2003	54	Radio One Inc	Crewe, VA	Nottoway
WREJ	AM	990	C	Black Gosp	Richmond, VA	Richmond, VA	07/02/2003	54	Radio Richmond LLC	Richmond, VA	Richmond (City)
WRNL	AM	910	C	Sprts/Talk	Richmond, VA	Richmond, VA	07/02/2003	54	iHeartMedia	Richmond, VA	Richmond (City)
WRVA	AM	1140	C	News/Talk	Richmond, VA	Richmond, VA	07/02/2003	54	iHeartMedia	Richmond, VA	Richmond (City)
WRVQ	FM	94.5	C	CHR	Richmond, VA	Richmond, VA	07/02/2003	54	iHeartMedia	Richmond, VA	Richmond (City)
WRXL	FM	102.1	C	Alternative	Richmond, VA	Richmond, VA	07/02/2003	54	iHeartMedia	Richmond, VA	Richmond (City)
WTOX	AM	1480	C	Mexican	Richmond, VA	Richmond, VA	09/27/2004	54	TBLC Media LLC	Glen Allen, VA	Henrico
WTPS	AM	1240	C	Nws/Tik/Old	Richmond, VA	Richmond, VA	07/02/2003	54	Radio One Inc	Petersburg, VA	Petersburg (City)

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

ATTACHMENT "B"

