

FEDERAL COMMUNICATIONS COMMISSION
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MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

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December 11, 2009

Karen A. Ross
Davis Wright Tremaine LLP
1919 Pennsylvania Ave. NW Suite 200
Washington, DC 20006-3402

Re: WPLX(AM), Turrell, AR
Facility Identification Number: 52906
Educational Media Foundation
License application: BMML-20090824AMR

Dear Counsel:

Our review of the subject license application shows the following deficiencies:

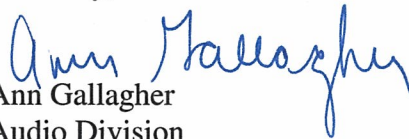
1. There is an inconsistency in the circuit model used to account for base region effects. In calculations of each tower's impedance at the ATU with the other tower open-circuited, the lightning choke shown in circuit diagrams was apparently excluded. The engineering statement indicates that the lightning choke was disconnected for these measurements. The circuit model used to calculate operating current and phase at the ATU, however, includes the lightning choke. According to Section 73.151(c)(2)(i), "The computer model, *once verified by comparison with measured base impedance matrix data*, shall be used to determine the appropriate antenna monitor parameters." (Emphasis added.) In order to provide the necessary verification, the model used to compare individual tower impedance measurements to predicted values must be the same as the model used to determine operating parameters.
2. The applicant did not submit one of the sampling system measurements required as part of a moment method proof of performance. Specifically, the applicant did not submit sampling system measurements showing the impedance of the sampling system at or near the carrier frequency with the sampling device connected, as Section 73.151(c)(2)(i) requires.
3. The operating parameters shown on Form 302-AM should be the same as those determined by the moment method model; i.e., the form should show the values tabulated in Exhibit III, page 9 of the engineering exhibit under the column heading "TCT Value Ratio/Phase."¹

Further action on the subject license application will be withheld until the applicant submits an amendment addressing the deficiencies described above. Failure to respond within 60 days from the

¹ See *Media Bureau Clarifies Procedures for AM Directional Antenna Performance Verification Using Moment Method Modeling*, Public Notice, DA 09-2340 (2009).

date of this letter may result in dismissal of the application pursuant to 47 CFR Section 73.3568(a)(1).

Sincerely,


Ann Gallagher
Audio Division
Media Bureau

Cc: Charles A. Hecht