FEDERAL COMMUNICATIONS COMMISSION 445 12th STREET SW WASHINGTON DC 20554

MEDIA BUREAU AUDIO DIVISION APPLICATION STATUS: (202) 418-2730 HOME PAGE: www.fcc.gov/mb/audio/ PROCESSING ENGINEER: Ann Gallagher TELEPHONE: (202) 418-2716 FACSIMILE: (202) 418-1411 MAIL STOP: 1800B3 INTERNET ADDRESS: Ann.Gallagher@fcc.gov

John F. Garziglia Womble Carlyle Sandridge & Rice, PLLC 1401 I Street NW 7th Floor Washington, DC 20005

Re:

Winston Communications, Inc. WQZQ, 830 kHz, Goodlettsville, TN Facility ID No. 72960 FCC File No. BMJP-20051024AAL

Dear Counsel:

The staff has under consideration the above-captioned AM Auction No. 84 application ("Application") by Winston Communications, Inc. proposing to change WQZQ's community of license from Clarksville to Goodlettsville, Tennessee, and to change the station's frequency from 1550 kHz to 830 kHz.

WQZQ proposes to use one of the existing towers of WPLN, 1430 kHz, Madison, Tennessee (Facility ID No. 21473). The WPLN towers and the existing ground system are electrically short at WQZQ's proposed new frequency, and consequently are not predicted to afford the required minimum efficiency. The Application initially requested a waiver of 47 C.F.R. §73.189 to permit an estimated antenna efficiency below the Class D minimum of 282 mV/m/kW at one kilometer. Subsequently, after discussions with the staff, WQZQ requested and received Special Field Test Authority (SFTA) to perform measurements establishing the antenna efficiency at 830 kHz.¹

The results of the field strength measurements were provided in a June 11, 2007, amendment to the Application. WQZQ claims that its measurements on six radials show the efficiency of the tower to be 285 mV/m/kW at 830 kHz. We find, however, that the field strength measurements lack sufficient close-in points to establish the effective field at one kilometer. According to 47 C.F.R. §73.186(a)(1), measurements should begin at approximately 0.25 kilometer from the antenna, and should be made at intervals of approximately 0.2 kilometer out to three kilometers. Measurements were not made at or near these intervals on any of the radials measured; of particular concern is the dearth of measurements within two kilometers of the antenna.

¹ SFTA was granted by letter dated February 2, 2007, with the test station assigned a call sign WQ4XZQ.

Further action on the Application will be withheld for a period of 60 days from the date of this letter. Failure to respond will result in dismissal of the Application for failure to prosecute under 47 C.F.R. §73.3568(a)(1). If you have questions, you may contact the processing engineer.

Sincerely, Susan N. Crawford **Assistant Chief** Audio Division Media Bureau

cc: Charles Anderson