

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: Edward Lubetzky
TELEPHONE: (202) 418-2700
FACSIMILE: (202) 418-1410/11
MAIL STOP: 1800B2-EAL
INTERNET ADDRESS: Edward.Lubetzky@fcc.gov

May 11, 2010

CBS Radio Inc. of Philadelphia
2175 K Street, NW
Suite 350
Washington, DC 20037

Re: CBS Radio Inc. of Philadelphia
WIP(AM), Philadelphia, PA
Facility ID Number: 28626
File Number: BMML-20100302ACK

Dear Applicant:

This is in reference to the above-captioned license application. The staff's review shows the following deficiencies in the application:

1. According to Section 73.151(c), the specification of the physical characteristics of the AM antenna may not violate the internal guidelines for the method of moments software used to model the array. In this case, the segment length-to-radius ratio violates the software's guidelines for each of the wire segments used to model the antenna. We have not evaluated the impedances and current distributions predicted by the model, as it fails to meet this basic criterion.
2. Section 73.150(c)(1)(i) limits the radii of modeled wire segments as compared to the actual tower dimensions. You have not provided enough information regarding the tapering dimensions of the towers to verify that the model complies with the rule.
3. The licensed array center coordinates (NAD27: North Latitude 39°51'56.0"; W Longitude 75°06'43.0"; NAD83: North Latitude 39°51'56.4"; W Longitude 75°06'41.6") don't agree with the array center coordinates in the antenna structure registration database (N Latitude 39°51'55" W Longitude 75°06'33.0").
4. Please designate clearly whether the impedance measurement of the sample line connected to the current transformer was made at carrier frequency, or at another frequency.

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 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: Kurt Gorman