Arthur Doak

From:	Stu Graham <rsg@grahambrock.com></rsg@grahambrock.com>
Sent:	Wednesday, July 10, 2013 11:28 AM
То:	Edna Prado
Cc:	John Price; asnipe@wfmv.com; Carrie Ward; Arthur Doak
Subject:	FW: WSPA-FM Construction Permit BPH-20130415ABG
Attachments:	WSPA-FM Construction Permit.pdf; WSPA RF Statement.pdf

Ms. Prado,

Several weeks ago I sent the following message with copies of the permit and our RF statement.

Since the Independence Day holiday may have interrupted correspondence I am re-sending this request.

We request the Special Operating Condition #3 to be removed from the permit. If you have any questions regarding this issue, please contact me at Graham Brock 912-638-8028 or by return e-mail.

Thank you for your attention to this matter.

Stu Graham

From: Stu Graham [mailto:rsg@grahambrock.com]
Sent: Friday, June 21, 2013 2:51 PM
To: Edna Prado (edna.prado@fcc.gov)
Cc: John Price (jprice@entercom.com); asnipe@wfmv.com
Subject: WSPA-FM Construction Permit BPH-20130415ABG

Ms. Prado,

Please review the WSPA-FM Construction Permit (BPH-20130415ABG) a copy of which is attached. Also attached is our RF analysis which was sent to the station under "additional information available if requested", but was not submitted with the original application.

In the permit, Special Operating Condition #3, Page 3, a Shively 6 bay (type 6) antenna is specified.

We note that no actual change to the existing antenna was ever contemplated nor was it noted in the application. The existing antenna is an ERI SHPX-6AC (EPA type 3) antenna. (in the CDBS Database)

This antenna will remain and will be unchanged.

Can you please re-issue the Construction Permit without Condition #3.

Thank you.

Stu Graham Graham Brock, Inc. 912-638-8028 <u>rsg@grahambrock.com</u>



United States of America FEDERAL COMMUNICATIONS COMMISSION FM BROADCAST STATION CONSTRUCTION PERMIT

Authorizing Official:

Official Mailing Address: ENTERCOM GREENVILLE LICENSE, LLC 401 CITY AVENUE SUITE 809 BALA CYNWYD PA 19004 Facility ID: 66400 Call Sign: WSPA-FM

Permit File Number: BPH-20130415ABG

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Edna V. Prado Supervisory Engineer Audio Division Media Bureau

Grant Date: June 10, 2013

This permit expires 3:00 a.m. local time, 36 months after the grant date specified above.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Commission rules which became effective on February 16, 1999, have a bearing on this construction permit. See Report & Order, Streamlining of Mass Media Applications, MM Docket No. 98-43, 13 FCC RCD 23056, Para. 77-90 (November 25, 1998); 63 Fed. Reg. 70039 (December 18, 1998). Pursuant to these rules, this construction permit will be subject to automatic forfeiture unless construction is complete and an application for license to cover is filed prior to expiration. See Section 73.3598.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Name of Permittee: ENTERCOM GREENVILLE LICENSE, LLC

Station Location: SC-SPARTANBURG

Frequency (MHz): 98.9

Channel: 255

Class: C

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: As required to achieve authorized ERP.

Antenna type: Non-Directional

Antenna Coordinates: North Latitude: 35 deg 10 min 11 sec West Longitude: 82 deg 17 min 28 sec

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW)	: 100	100
Height of radiation center above ground (Meters):	43	43
Height of radiation center above mean sea level (Meter	rs): 1016	1016
Height of radiation center above average terrain (Met	ers): 581	581
Antenna structure registration number: Not Required		
Overall height of antenna structure above ground:	53 Meters	
Obstruction marking and lighting specifications for antenna structure:		

It is to be expressly understood that the issuance of these specifications is in no way to be considered as precluding additional or modified marking or lighting as may hereafter be required under the provisions of Section 303(q) of the Communications Act of 1934, as amended.

None Required

Special operating conditions or restrictions:

- 1 The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.
- 2 Granted pursuant to the grandfathering provisions of Note 4 to 47 C.F.R. Section 73.3555 (2003). See also 2002 Biennial Regulatory Review - Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13620, 13809-10 (2003), aff'd in part and remanded in part, Prometheus Radio Project, et al. vs. F.C.C., 373 F.3d 372 (3d Cir. 2004), stay modified on reh'g, No. 03-3388 (3d Cir. Sept. 3, 2004), cert. denied, 125 S. Ct. 2902, 2903, 2904 (2005).

Special operating conditions or restrictions:

Permittee has specified use of the antenna listed below to demonstrate compliance with the FCC radiofrequency electromagnetic field exposure guidelines. If any other type or size of antenna is to be used with the facilities authorized herein, THE AUTOMATIC PROGRAM TEST PROVISIONS OF 47 C.F.R. SECTION 73.1620 WILL NOT APPLY. In this case, a FORMAL REQUEST FOR PROGRAM TEST AUTHORITY must be filed in conjunction with FCC Form 302-FM, application for license, BEFORE program tests will be authorized. The request must include a revised RF field showing to demonstrate continued compliance with the FCC quidelines.

Shively (EPA Type 6), 6 sections

*** END OF AUTHORIZATION ***

MINOR CHANGE APPLICATION ENTERCOM GREENVILLE LICENSE, LLC WSPA-FM FM RADIO STATION CH 255C - 98.9 MHz - 100.0 kW SPARTANBURG, SOUTH CAROLINA March 2013

EXHIBIT #5

Radio Frequency Assessment

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. §1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997 ("Bulletin"), regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. This study considers all nearby stations and utilizes the appropriate formulas contained in the OET Bulletin.

The WSPA-FM antenna is an ERI SHPX-6AC, six bay, full wavelength spaced, circularly polarized, non-directional antenna. The antenna center of radiation is 43.0 meters (141.0 feet) above ground. The calculated maximum percentage of the FCC's RF radiation limit for occupational or controlled exposure above ground level is 27.0% at a distance of 13.0 meters from the tower base. At this distance, the general or uncontrolled exposure at ground level is 136%. However, beyond 18.0 meters from the base, the general population or uncontrolled exposure at ground level is less than 100%, and access to the WSPA-FM site is controlled. The site is a remote mountaintop location with no public access. Multiple locked fences and gates with RF radiation warning signs restrict site access at distances greater than 1.0 mile from the tower site.

With respect to workers on the tower or on the ground in the immediate vicinity of the tower, appropriate power reduction or complete cessation of transmitter operations are undertaken by the licensee. Since access to the transmitter site is controlled, there is general public exposure and appropriate warning signs are posted. Thus this facility complies with the maximum permissable radio frequency electromagnetic exposure limits for controlled and uncontrolled environments.