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FEDERAL COMMUNICATIONS COMMISSION
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FEB 12 1998

John L. Tierney, Esq.
Tierney & Swift
2175 K Street, N.W.
Suite 350
Washington, D.C. 20037

In re: WAMB-FM1, Donelson, TN
Great Southern Broadcasting
Company, Inc. ("Great Southern")
Special Temporary Authority

Dear Mr. Tierney:

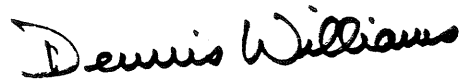
This is in response to your letter dated January 5, 1998 requesting a modification and extension of the Special Temporary Authority (STA) originally granted by Commission's letter ("Letter") dated August 14, 1990.¹ Your letter requests that the STA be modified to specify operation on Channel 254 because FM station WNPL, Belle Meade, Tennessee was granted authority to operate on Channel 294.² The change in channel is necessary because Great Southern's current facilities on Channel 294 would cause interference to WNPL's authorized facilities. Grant of this STA request will allow Great Southern to maintain its service to community of Donelson, during nighttime hours only, as specified on its broadcast license.

¹ The Letter granted Great Southern authority to duplicate the programming of AM station WAMB, Donelson, Tennessee on an FM channel to alleviate serious nighttime interference to WAMB's signal caused by a co-channel Cuban broadcast station. The original STA was granted for operation on Channel 294 with a maximum effective radiated power of 75 watts.

² WNPL's construction permit, BMPH-970221ID, was granted on September 11, 1997. Subsequently, on February 12, 1998, WNPL was granted program test authority with these facilities.

In light of the above, the Special Temporary Authority IS HEREBY GRANTED for Great Southern Broadcasting Company, Inc. to operate with the facilities originally authorized by Letter dated August 14, 1990, except with the channel change to Channel 254. This authority expires on August 12, 1998.

Sincerely,

A handwritten signature in black ink that reads "Dennis Williams". The script is cursive and fluid, with the first name "Dennis" and last name "Williams" clearly distinguishable.

Dennis Williams
Assistant Chief
Audio Services Division
Mass Media Bureau

cc: Great Southern Broadcasting Company, Inc.

50,000 WATTS

WAMB

1160 AM

January 2, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D. C. 20554

Re: WAMB-FM1 (STA)
Donelson, Tennessee

Dear Ms. Salas:

Great Southern Broadcasting Company, Inc. (Great Southern), is licensee of WAMB (AM), Donelson, Tennessee, and holder of Special Temporary Authority (STA) for FM booster WAMB-FM1.

Because of severe nighttime interference to its AM signal from a Cuban radio station operating co-channel on 1160 kHz, the Commission granted a STA August 14, 1990, to WAMB for a FM booster station to duplicate its nighttime programming on FM Channel 294 (106.7 MHz) with a power of 75 watts ERP using the assigned call letters WAMB-FM1. WAMB-FM1 has been in operation since its completed construction on November 26, 1990.

The Commission's authority to grant Great Southern's request for the STA was authorized by the Radio Broadcasting to Cuba Act, Public Law 98-111, enacted by the United States Congress on October 4, 1983, in Section 7, Paragraph (b), which recognizes the granting of STAs by the Commission to mitigate the effects of activities by the Government of Cuba which directly interferes with the transmission and reception of broadcasts by United States licensees. In Paragraph (c) of that Section, the Congress directs the Commission to issue regulations and establish procedures to carry out Section 7 as the Commission finds appropriate, and in Paragraph (f) of that Section it states it is the sense of Congress that a task force should be established to analyze the level of Cuban interference to the United States broadcasters and to seek a practical political and technical solution to this problem.

To date no political or diplomatic solution has been worked out between the United States and Cuba over interference problems in the AM band. The granting of the STA by the Commission to Great Southern to operate WAMB-FM1 was and is a practical technical solution in keeping with the spirit of the Radio Broadcasting to Cuba Act.

WAMB

1160 AM

WAMB-FM1,
Page 2

Channel 294 in the Donelson area has been allotted to Belle Meade, Tennessee, and a construction permit has been issued to WNPL to build a new FM station co-channel to WAMB-FM1 approximately 9 miles from the WAMB-FM1 antenna. WAMB-FM1 and WNPL cannot both operate on Channel 294 therefore WAMB-FM1 will be required to cease broadcasting. This is imminent.

Great Southern has determined that it can operate WAMB-FM1 on Channel 254 (98.7 MHz) with the same facilities it now is authorized on Channel 294. This would provide the same coverage as now authorized and would meet the conditions on Page 3 of the Commission's September 17, 1990, authorization in the event it became necessary to modify its STA. Operating in this manner it would not cause interference to any licensed radio station or construction permit holder. It would receive interference from WANT (FM), Lebanon, Tennessee, however, FM booster stations are allowed to accept interference.

You will find enclosed three copies of our application (FCC Form 349) to make changes in our present STA to continue to operate WAMB-FM1 on Channel 254 instead of Channel 294.

Attached to his request are:

- 1) Copy of the Federal Communications Commission's letter of September 17, 1990, authorizing its action of August 14, 1990, in granting WAMB-FM1;
- 2) Copy of the Radio Broadcasting to Cuba Act, Public Law 98-111; and
- 3) Proposed coverage map of WAMB-FM1 operating with 75 watts ERP on Channel 254.

50,000 WATTS

615-889-1960

WAMB

1160 AM

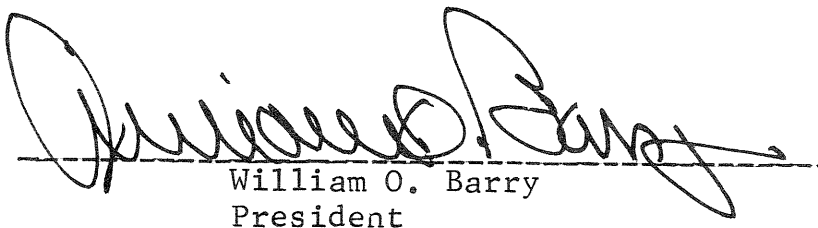
WAMB-FM1,
Page 3

So that WAMB-FM1 can continue its service uninterrupted, we request that the Commission expedite the processing of this application. The current freeze on the acceptance of major change applications in booster stations should not effect the acceptance and processing of this STA request.

Very truly yours,

GREAT SOUTHERN BROADCASTING COMPANY, INC.
WAMB-FM1

By



William O. Barry
President

Before the
Federal Communications Commission
Washington, D.C. 20554

8930-MER

September 17, 1990

Ann Bavender, Esquire
Tierney & Swift
Suite 210
1200 Eighteenth Street, N.W.
Washington, D.C. 20036

Dear Ms. Bavender:

This is in response to your request for special temporary authority (STA) filed August 2, 1988, as amended, on behalf of Great Southern Broadcasting Company, Inc. (Great Southern), licensee of AM broadcast station WAMB, Donelson, Tennessee.

You request an STA to duplicate the programming of AM station WAMB on an FM channel to alleviate serious nighttime interference to WAMB's signal caused by a co-channel Cuban broadcast station. Station WAMB is a Class II-B AM broadcast station operating on 1160 kHz with power of 50 kW nondirectional daytime and 1 kW nighttime with a directional antenna system. Mr. William Barry, President of Great Southern, states that nighttime interference to station WAMB on 1160 kHz has occurred intermittently for over six years. Since June 19, 1988, the degree of interference occurring each night in the Donelson area has been so severe that local service has been virtually destroyed. Measurements of the nighttime Cuban interfering signal were submitted with the STA request to substantiate this claim. Great Southern contends that there are no modifications that can be made to the AM facility itself that will overcome the interference without causing interference to other AM stations. Great Southern's latest proposal is to operate the STA facility on channel 294 (106.7 MHz) with a directional, circularly polarized, antenna array, and a maximum effective radiated power of 300

watts (ERP) in any direction. The antenna array will be side-mounted on the WAMB number one tower of the AM antenna system. In Mr. Barry's view, the proposal will serve an area essentially the same as the WAMB protected nighttime coverage contour (28.1 mV/m) before the Cuban interference affected it.

Great Southern has demonstrated that the interference to the nighttime signal of station WAMB is severe and is caused by a co-channel Cuban broadcast station. In addition, Great Southern has shown that because of protection requirements to other broadcast stations the preferred method of increasing the nighttime power for station WAMB to overcome the Cuban interference is not feasible. A search of all 106 alternative frequencies was also made to determine whether a second frequency could be used to offset the nighttime Cuban interference. Although one possible frequency was found, its use would require extensive modification of WAMB's nighttime directional antenna system and the construction of additional towers.

Under the circumstances noted above, we believe that grant of your request, subject to certain conditions and changes, is appropriate. First, the Radio Broadcasting to Cuba Act¹ contemplates relief for domestic radio stations receiving interference from Cuban radio stations and reflects Congress's concern that listeners of domestic broadcast stations suffer minimum disruption from Cuban radio stations². Further, Section 303(g) of the Communications Act mandates the Commission to "provide for experimental uses of frequencies, and generally encourage the larger and more effective use of radio in the public interest." Finally, you have documented severe interference, and have shown a lack of alternative solutions on WAMB's existing frequency as a means of restoring lost service. Grant of this authorization is, however, simply an interim measure taken until a solution can be reached between the United States and Cuba over interference problems in the AM band.

We note that the proposed ERP of 300 watts will produce a coverage area that would exceed the WAMB protected nighttime coverage area prior to the time

¹ Pub. L. No. 98-111, 97 Stat. 749 (approved October 4, 1983).

² See, for example, Commission's files for stations WKAT, Miami Beach, Florida (STA granted October 27, 1981), WINZ, Miami, Florida (STA granted April 15, 1982) and WCGY, West Palm Beach, Florida (STA granted December 23, 1981).

the Cuban interference affected it. We have determined that a maximum ERP of 75 watts using the proposed antenna array would transmit to a coverage area that would closely duplicate the protected nighttime coverage of station WAMB prior to the time the Cuban interference affected it. The STA will therefore specify operation with the proposed antenna system and a maximum effective radiated power of 75 watts in any direction. If it subsequently becomes necessary to modify the proposed FM facility, the applicant must demonstrate that the proposed alterations will not change the FM coverage area. Therefore, in order to permit station WAMB to restore service to its community during the nighttime hours specified on its broadcast license, we will grant the STA request for operation of an FM facility, nighttime hours of operation only, as modified herein, subject to the conditions set out below.

Conditions:

Before any construction of the facilities may begin Great Southern must submit a statement that a grant of its STA request would not have a significant environmental impact, including exposure of workers or the general public to harmful nonionizing radiation levels, or file an environmental assessment and await further Commission review and approval. See Sections 1.1307 and 1.1308 of the Commission's Rules.

In order to avoid confusion to members of the public who will be listening to the signal of AM station WAMB on both an AM frequency (1160 kHz) and an FM channel 249 (106.7 MHz), we will assign the call letters WAMB-FM1 for use with the STA facilities. We will also require Great Southern to make appropriate station identification announcements pursuant to Section 73.1201 of the Commission's Rules during those times that the station is in operation.

The instant authorization is also being granted on the condition that it cause no interference to any existing or new broadcast facility.³ In the event interference is caused by the STA facility, Great Southern shall immediately take whatever action may be necessary to eliminate the interference, including reducing its power or ceasing operation. In

³ Great Southern has demonstrated, and the staff has confirmed, that the proposed facilities should not cause prohibited interference to any authorized or proposed station. These studies were based on Section 73.509 of the Commission's Rules.

addition, Great Southern shall notify the Commission of any interference complaints and the corrective action taken.

Great Southern proposes to mount the antenna on tower number one of the WAMB directional array. As a result, there is a possibility that the AM array will be adversely affected. We will therefore place the following condition on grant of the STA:

During the installation of the antenna authorized herein, AM Station WAMB shall determine operating power by the indirect method and, if necessary, request temporary authority from the Commission in Washington to operate with parameters at variance in order to maintain monitoring point values within authorized limits. Upon completion of the installation, common point impedance measurements on the AM array shall be made and a partial proof of performance, as defined by Section 73.154(a) of the Commission's Rules, shall be conducted to establish that the AM array has not been adversely affected; the results shall be submitted to the Commission (along with a tower sketch of the installation) in an application for the AM station to return to the direct method of power determination.

Upon completion of construction and prior to any operation of the facilities Great Southern shall request program test authority.

Since the sole function of the FM facility will be to simultaneously broadcast the programming of station WAMB, the requirement that an operator be present while a station is engaged in broadcasting, as set forth in Section 318 of the Communications Act, will be satisfied by the operator of the AM facility.

Accordingly, for the reasons set forth above the request for special temporary authorization filed by Great Southern Broadcasting Company, Inc., IS GRANTED, subject to the conditions set forth above, for an initial period of 180 days from the date of this letter, and subject to extension in accordance with requirements of Section 73.1635 of our Rules and Section 303(g) of the Communications Act of 1934, as amended. This letter was adopted by the Commission on August 14, 1990.

BY DIRECTION OF THE COMMISSION

Donna R. Searcy
Donna R. Searcy
Secretary