

ORIGINAL



2018 FEB 21 PM 2:46

ANDREW S. KERSTING  
REGULATORY COUNSEL

(404) 260-6761  
[ANDY.KERSTING@CUMULUS.COM](mailto:ANDY.KERSTING@CUMULUS.COM)

February 20, 2018

*By Hand*

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
Attn: Audio Division

ACCEPTED/FILED  
FEB 20 2018  
Federal Communications Commission  
Office of the Secretary

Re: **Application for Direct Measurement of Power**  
Cumulus Licensing LLC  
Station WOSH(AM), Oshkosh, WI  
Facility ID 69780

Dear Ms. Dortch:

0002834810

Transmitted herewith in triplicate on behalf of Cumulus Licensing LLC, licensee of radio station WOSH(AM), Oshkosh, Wisconsin, is an application on FCC Form 302-AM requesting a direct measurement of power authorization.

No filing fee has been submitted with this application because no fee is required.

Should any questions arise concerning this application, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Andy".

Andrew S. Kersting  
Regulatory Counsel

Enclosure

**ACCEPTED/FILED**

FOR  
FCC  
USE  
ONLY

FEB 20 2018

Federal Communications Commission  
Office of the Secretary

**FCC 302-AM  
APPLICATION FOR AM  
BROADCAST STATION LICENSE**

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO. *BZ-20180220 AEE*

**SECTION I - APPLICANT FEE INFORMATION**

1. PAYOR NAME (Last, First, Middle Initial)

Cumulus Licensing LLC

MAILING ADDRESS (Line 1) (Maximum 35 characters)

3280 Peachtree Road, NW

MAILING ADDRESS (Line 2) (Maximum 35 characters)

Suite 2200

CITY

Atlanta

STATE OR COUNTRY (if foreign address)

GA

ZIP CODE

30305

TELEPHONE NUMBER (include area code)

(404) 949-0700

CALL LETTERS

WOSH

OTHER FCC IDENTIFIER (If applicable)

69780

2. A. Is a fee submitted with this application?

Yes  No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

Governmental Entity  Noncommercial educational licensee  Other (Please explain): Non-Feeable Application

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A) FEE TYPE CODE	(B) FEE MULTIPLE	(C) FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY
	0 0 0 1	\$	

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)	FOR FCC USE ONLY
	0 0 0 1	\$	

ADD ALL AMOUNTS SHOWN IN COLUMN C,  
AND ENTER THE TOTAL HERE.  
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED  
REMITTANCE.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY
\$	

<b>SECTION II - APPLICANT INFORMATION</b>		
1. NAME OF APPLICANT CUMULUS LICENSING LLC		
MAILING ADDRESS 3280 PEACHTREE ROAD, NW, SUITE 2200		
CITY Atlanta	STATE GA	ZIP CODE 30305

2. This application is for:
- Commercial       Noncommercial
- AM Directional       AM Non-Directional

Call letters WOSH	Community of License Oshkosh, WI	Construction Permit File No. N/A	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?  Yes  No

If No, explain in an Exhibit.      This application is for a direct measurement of power authorization.  Yes  No

Exhibit No. See explanatory response.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?  Yes  No

If No, state exceptions in an Exhibit.      See response above.  Yes  No

Exhibit No. Not Applicable

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?  Yes  No

If Yes, explain in an Exhibit.  Yes  No

Exhibit No.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?  Yes  No

If No, explain in an Exhibit.  Does not apply

Exhibit No.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?  Yes  No

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.  Yes  No

Exhibit No.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

Yes  No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).


The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

**CERTIFICATION**

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

Yes  No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name Richard S. Denning	Signature 	
Title Senior Vice President & General Counsel	Date 2/20/2018	Telephone Number (404) 949-0700

**WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION**

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

**SECTION III - LICENSE APPLICATION ENGINEERING DATA**

Name of Applicant

Cumulus Licensing LLC

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

Station License

Direct Measurement of Power

1. Facilities authorized in construction permit					
Call Sign	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation	Power in kilowatts	
WOSH		1490	U	Night 1.0	Day 1.0
2. Station location					
State			City or Town		
Wisconsin			Oshkosh		
3. Transmitter location					
State	County	City or Town		Street address (or other identification)	
WI	Winnebago	Oshkosh		2333 Bowen Street	
4. Main studio location					
State	County	City or Town		Street address (or other identification)	
WI	Winnebago	Oshkosh		491 S Washburn St., Ste. 400	
5. Remote control point location (specify only if authorized directional antenna)					
State	County	City or Town		Street address (or other identification)	

6. Has type-approved stereo generating equipment been installed?  Yes  No
7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?  Yes  No
- Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.

Exhibit No.
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8. Operating constants:							
RF common point or antenna current (in amperes) without modulation for night system				RF common point or antenna current (in amperes) without modulation for day system			
3.66				3.66			
Measured antenna or common point resistance (in ohms) at operating frequency				Measured antenna or common point reactance (in ohms) at operating frequency			
Night		Day		Night		Day	
74.5		74.5		-J 299		-J 299	
Antenna indications for directional operation							
Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents		
	Night	Day	Night	Day	Night	Day	
N/A							
Manufacturer and type of antenna monitor: N/A							

9. Description of antenna system (If directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator  Uniform cross section guyed steel tower	Overall height in meters of radiator above base insulator, or above base, if grounded.  103.6	Overall height in meters above ground (without obstruction lighting)  104.6	Overall height in meters above ground (include obstruction lighting)  105.5	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.  Exhibit No.
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Excitation       Series       Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	44 °	02 '	45 "	West Longitude	88 °	31 '	45 "
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.

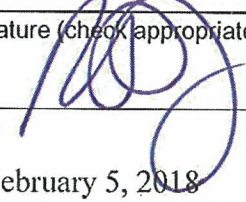
10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

None.

11. Give reasons for the change in antenna or common point resistance.

Tower maintenance, system aging, work on co-located auxiliary service antenna.

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) R. Stuart Graham	Signature (check appropriate box below) 
Address (include ZIP Code)  Graham Brock, Inc. P. O. Box 24466 St. Simons Island	Date February 5, 2018
	Telephone No. (Include Area Code) 912-638-8028

Technical Director

Registered Professional Engineer

Chief Operator

Technical Consultant

Other (specify)

**ENGINEERING STATEMENT**

**WOSH – OSHKOSH, WI**

**OCTOBER 19, 2017**

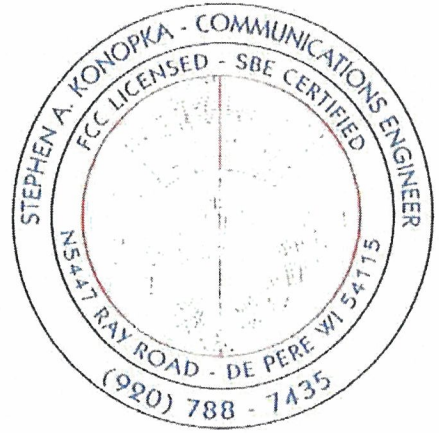
This submission is on behalf of Cumulus Broadcasting Inc. / Oshkosh, whereby a small variance in transmitter operating parameters suggested the need for conducting new AM Antenna Base Impedance measurements.

The subject AM radiator consists of a series-fed, uniform cross-section, guyed steel tower, 331 feet in height. A four-foot diameter STL dish antenna is located at 80-feet AGL and an eight-foot long fiberglass communications antenna is located at 250 feet AGL. These appurtenances and their coaxial feed lines are electrically bonded to the tower structure and are fed across the tower base via standard-type iso-couplers. Marker lighting is fed via a conventional choke coil.

The resultant data in this report demonstrates that the Antenna Resistance component has changed by greater than two percent from the presently licensed value. Hence, this application for Direct Measurement of Power is respectfully submitted in accordance with Sec. 73.1692(a).

  
Stephen A. Konopka

Dated 10-4-17



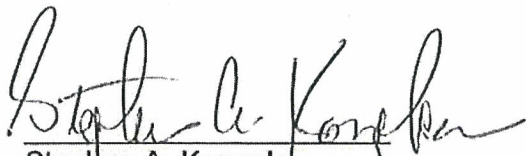
**ANTENNA RESISTANCE AND REACTANCE MEASUREMENTS**

**STATION WOSH AM – OSHKOSH, WI**

**PERFORMED OCTOBER 19, 2017**

<u>Frequency (kHz)</u>	<u>Resistance (Ohms)</u>	<u>Reactance (Ohms)</u>
1490*	74.5	-j 299

\*Operating Carrier Frequency.

  
Stephen A. Konopka  
Technical Consultant

Dated 12-4-17





**DESCRIPTION OF IMPEDANCE MEASURING INSTRUMENTS**

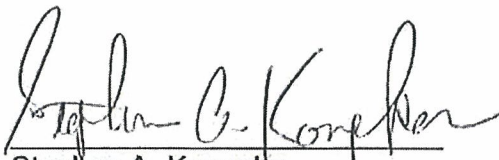
**STATION WOSH – 1490 KHZ – OSHKOSH, WI**

R.F. Bridge: General Radio model 1606-A, S/N 1699.

R.F. Generator / Detector: Potomac model SD-31, S/N 544.

R.F. Receiver: Potomac model RX-31, S/N 465.

All above instruments last calibrated against NIST standards in May, 2017.

  
Stephen A. Konopka

Dated 12-4-17

( City Of De Pere  
( County Of Brown  
( State Of Wisconsin

Stephen A. Konopka, being duly sworn upon his oath, deposes and states that;

He is the proprietor of an AM/FM/TV Field Technical Service, with his office located at N5447 Ray Road, De Pere, Wisconsin, 54115.

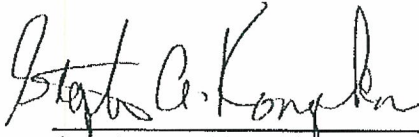
He has accrued over 40 years of experience in broadcast engineering.

He is the holder of FCC General Radiotelephone License No. PG-18-19007.

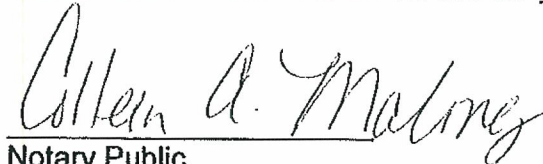
He holds valid SBE Certification No. 2641.

He has performed numerous Antenna Resistance, Field-Intensity and Occupied Bandwidth measurements which are a matter of Record with the Federal Communications Commission.

The facts herein are true of his own knowledge, except such facts as are stated to be information and belief, and as to such facts, he believes them to be true.

  
Stephen A. Konopka

Subscribed and sworn to before me on December 5<sup>th</sup>, 2017

  
Notary Public,  
Brown County, WI

My Commission expires on 10-11-2020

