

2



**Fletcher, Heald & Hildreth**



ORIGINAL

2018 APR 17 PM 1:33

1300 NORTH 17th STREET, 11th FLOOR  
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400  
FAX: (703) 812-0486  
www.fhhlaw.com  
www.commlawblog.com

April 16, 2018

FRANK R. JAZZO  
(703) 812-0470  
JAZZO@FHHLAW.COM

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Accepted / Filed

APR 16 2018

Attn: Audio Division, Media Bureau

Federal Communications Commission  
Office of the Secretary

**Re: Zimmer Radio, Inc.  
KZYM, Joplin, MO (Facility ID No. 407)  
FCC 302-AM - Direct Measurement Application**

Dear Ms. Dortch:

Transmitted herewith, in triplicate, on behalf of Zimmer Radio, Inc., licensee of the above-captioned station, is an application for direct measurement of power on FCC 302-AM. There is no filing fee associated with this application.

Please contact me if there are any questions regarding this matter.

Sincerely,

  
Frank R. Jazzo  
Counsel for Zimmer Radio, Inc.

Enclosures

Accepted / Filed

Federal Communications Commission  
Washington, D. C. 20554Approved by OMB  
3060-0627  
Expires 01/31/98FOR  
FCC  
USE  
ONLY

APR 16 2018

Federal Communications Commission  
Office of the SecretaryFCC 302-AM  
APPLICATION FOR AM  
BROADCAST STATION LICENSE

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO. BZ-20180416 AAZ

## SECTION I - APPLICANT FEE INFORMATION

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

Zimmer Radio, Inc.

MAILING ADDRESS (Line 1) (Maximum 35 characters)

325 South Kingshighway

MAILING ADDRESS (Line 2) (Maximum 35 characters)

Suite B

CITY

Cape Girardeau

STATE OR COUNTRY (if foreign address)

MO

ZIP CODE

63703-5701

TELEPHONE NUMBER (include area code)

573-334-7474

CALL LETTERS

KZYM

OTHER FCC IDENTIFIER (If applicable)

407

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): Direct

Measurement

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)	(B)	(C)	
FEE TYPE CODE	FEE MULTIPLE	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

2018 APR 17 PM 1:33

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Zimmer Radio, Inc.		
MAILING ADDRESS 325 South Kingshighway, Suite B		
CITY Cape Girardeau	STATE MO	ZIP CODE 63703-5701

2. This application is for:

☒ Commercial
 ☐ Noncommercial  
☐ AM Directional
 ☒ AM Non-Directional

Call letters KZYM	Community of License Joplin, MO	Construction Permit File No. N/A	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
----------------------	------------------------------------	-------------------------------------	--	--

3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

☐ Yes ☐ No

Exhibit No.  
N/A

If No, explain in an Exhibit.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

☐ Yes ☐ No

Exhibit No.  
N/A

If No, state exceptions in an Exhibit.

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

Exhibit No.  
N/A

If Yes, explain in an Exhibit.

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

☒ Does not apply

Exhibit No.  
N/A

If No, explain in an Exhibit.

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

Exhibit No.  
N/A

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.



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.  
N/A

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).

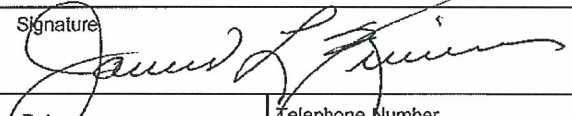
The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

#### 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 James L. Zimmer	Signature 	
Title President	Date 4/16/2018	Telephone Number 573-334-7474

**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.

ENGINEERING EXHIBIT E-2

APPLICATION FOR

DIRECT MEASUREMENT OF POWER

KZYM(AM) - JOPLIN, MO

Zimmer Radio, Inc.  
Joplin, MO

April 13, 2018

Prepared for: Mr. James Zimmer  
Zimmer Radio, Inc.  
325 South Kingshighway  
Suite B  
Cape Girardeau, MO 63703-5701

**CARL E. SMITH CONSULTING ENGINEERS**

## CONTENTS

Title Page

Contents

FCC Form 302-AM

Section III

Engineering Affidavits

Roy P. Stype, III  
Ronald W. Coffman

Engineering Statement

1.0 General

Fig. 1.0 - Vertical Plan View

2.0 Base Impedance Measurements

Fig. 2.0 - KZYM Antenna Coupling Unit

### SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant  
Zimmer Radio, Inc.

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	
KZYM		1230	U	Night 0.6	Day 0.56

#### 2. Station location

State Missouri	City or Town Joplin
-------------------	------------------------

#### 3. Transmitter location

State MO	County Jasper	City or Town Joplin	Street address (or other identification) 1309 South Monroe Avenue
-------------	------------------	------------------------	---

#### 4. Main studio location

State	County No longer required	City or Town	Street address (or other identification)
-------	------------------------------	--------------	---

#### 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.

N/A

#### 8. Operating constants:

RF common point or antenna current (in amperes) without modulation for night system 1.86	RF common point or antenna current (in amperes) without modulation for day system 1.79
Measured antenna or common point resistance (in ohms) at operating frequency Night 174 Day 174	Measured antenna or common point reactance (in ohms) at operating frequency Night -j316.1 Day -j316.1

#### 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

Manufacturer and type of antenna monitor:



SECTION III - Page 2

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

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lighting)	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
Guyed Tower	122.8	123.1	124.0	Exhibit No. N/A

Excitation ☒ Series ☐ Shunt ASRN: 1002748

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

North Latitude	37	°	04	'	34	"	West Longitude	94	°	32	'	32	"
----------------	----	---	----	---	----	---	----------------	----	---	----	---	----	---

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.  
E-2

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

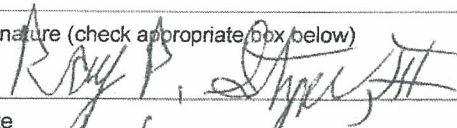
Exhibit No.

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

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

The K41KX-D antenna and associated transmission line was removed from the tower.

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) Roy P. Stype, III	Signature (check appropriate box below) 
Address (include ZIP Code) P. O. Box 807 2324 North Cleveland-Massillon Road Bath, OH 44210-0807	Date 4/13/2018
	Telephone No. (Include Area Code) 330/659-4440

☐ Technical Director

☐ Registered Professional Engineer

☐ Chief Operator

☒ Technical Consultant

☐ Other (specify)



ENGINEERING AFFIDAVIT

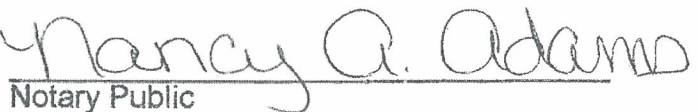
State of Ohio                                 )  
County of Summit                         ) ss:

Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Zimmer Radio, Inc. to prepare the attached "Engineering Exhibit E-2."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.

  
\_\_\_\_\_  
Roy P. Stype, III

Subscribed and sworn to before me on **April 13, 2018.**

  
\_\_\_\_\_  
Notary Public

/SEAL/


Nancy A. Adams, Notary Public  
Residence - Cuyahoga County  
State Wide Jurisdiction, Ohio  
My Commission Expires Sept. 27, 2020

ENGINEERING AFFIDAVIT


State of Ohio                    )  
County of Summit            ) ss:

Ronald W. Coffman, being duly sworn, deposes and states that he is a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Zimmer Radio, Inc. to prepare the attached "Engineering Exhibit E-2."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.

  
\_\_\_\_\_  
Ronald W. Coffman

Subscribed and sworn to before me on **April 13, 2018**.

  
\_\_\_\_\_  
Nancy A. Adams  
Notary Public

Nancy A. Adams, Notary Public  
Residence - Cuyahoga County  
State Wide Jurisdiction, Ohio  
My Commission Expires Sept. 27, 2020

/SEAL/

## ENGINEERING STATEMENT

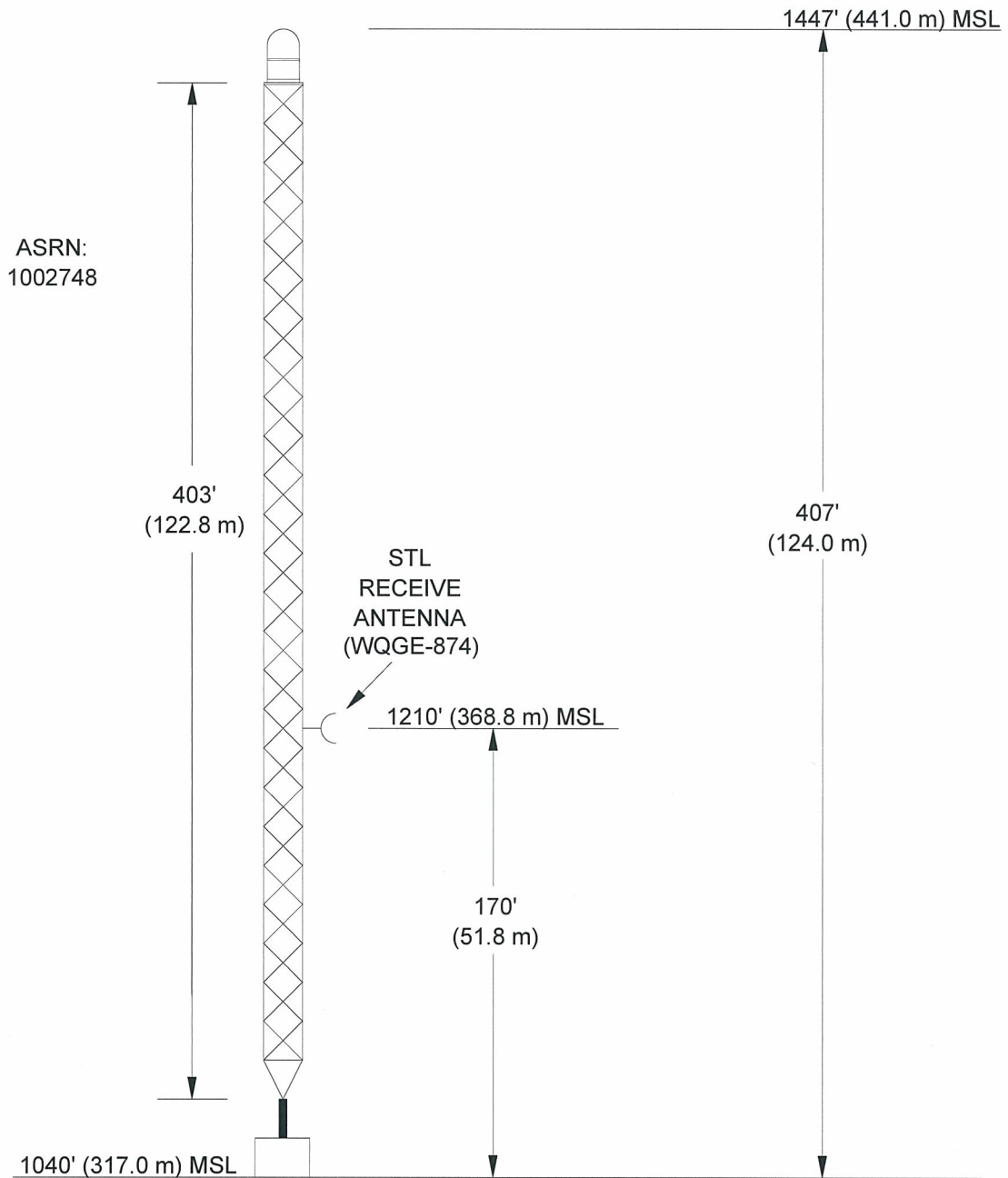
### 1.0 GENERAL

This engineering exhibit is prepared on behalf of Zimmer Radio, Inc, licensee of Radio Station KZYM(AM) - Joplin, Missouri. It supports an application for direct measurement of power for KZYM. This application is necessary due to a base impedance change as a result of the removal of the K41KX-D antenna and transmission line from the tower used by KZYM.

There has been no change to the KZYM ground system which still consists of 120 equally spaced buried copper radials, each 61 meters in length, buried approximately 10 centimeters deep about the tower.

Figure 1.0 is a vertical plan view of the KZYM tower showing the locations of other antennas on this tower. Section 2.0 of this exhibit includes the results of base impedance measurements which were conducted on the KZYM antenna following the removal of the K41KX-D antenna and transmission line.





NOTE:

- 1) WQGE-874 TRANSMISSION LINE ISOLATED USING AN ISOCOUPLER.

NOT TO SCALE

NL - 37° 04' 34"

WL - 94° 32' 32"

CARL E. SMITH CONSULTING ENGINEERS  
2324 N. CLEVE-MASS., RD. BOX 807  
BATH, OHIO 44210-0807  
(330) 659-4440

FIG. 1.0

VERTICAL PLAN VIEW

ZIMMER RADIO, INC.  
JOPLIN, MO

## 2.0 BASE IMPEDANCE MEASUREMENTS

The KZYM base impedance was measured on March 29, 2018 by Dave Obergoenner using a Delta Electronics OIB-3 operating impedance bridge. The manufacturer's stated accuracy for this bridge is  $\pm 2\%$ ,  $\pm 1$  ohm. The KZYM transmitter was used as the signal source for these impedance measurements and a Potomac Instruments FIM-41 (S/N 567) field intensity meter was used as the null detector. These measurements found that the base impedance of the KZYM tower is:

**174.0 -j316.1 ohms**

Figure 2.0 is a diagram of the KZYM antenna coupling unit showing the location at which these impedance measurements were conducted.

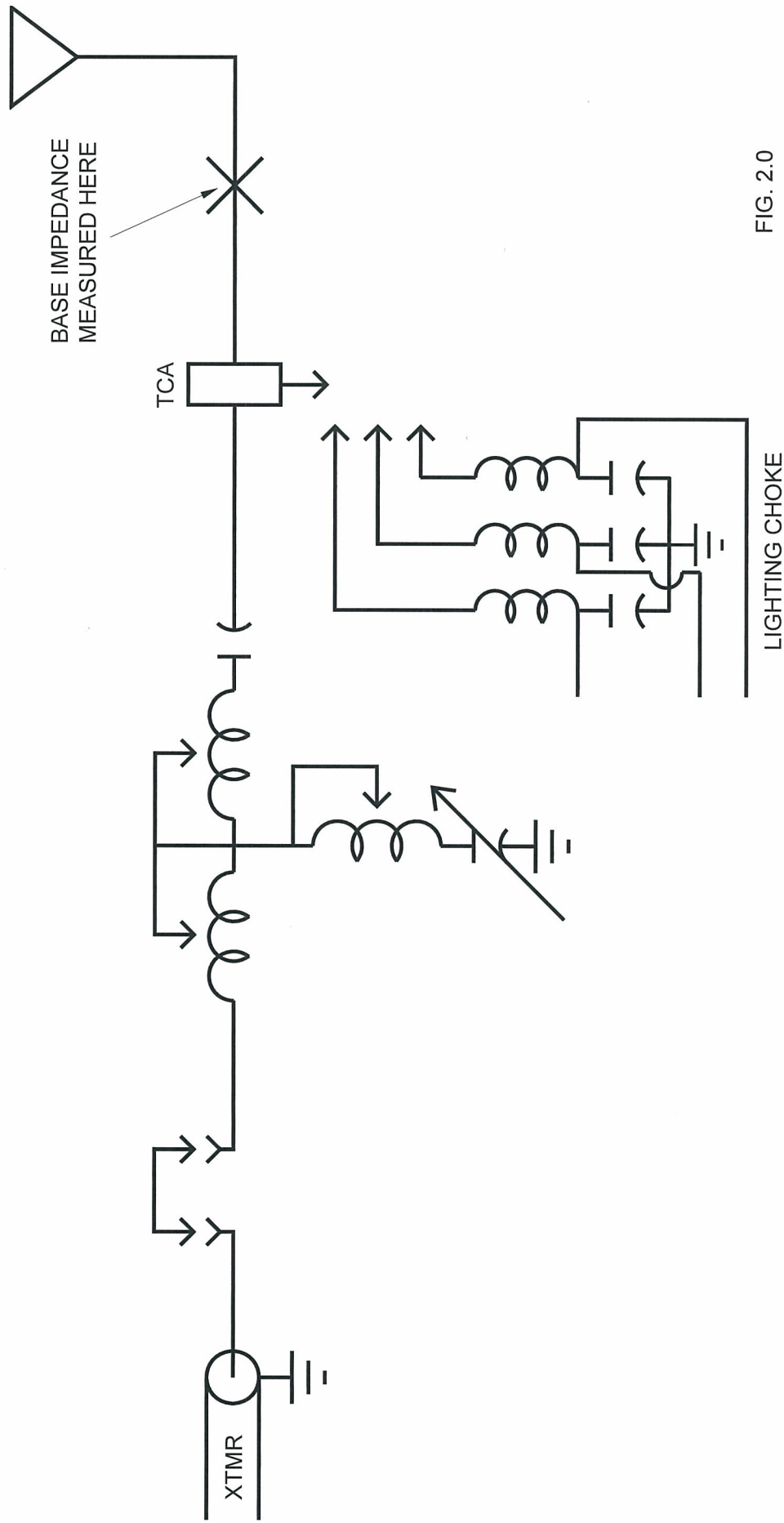


FIG. 2.0

KZYM ANTENNA COUPLING UNIT

ZIMMER RADIO, INC.  
JOPLIN, MO

CARL E. SMITH CONSULTING ENGINEERS  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
(330) 659-4440