FEDERAL COMMUNICATIONS COMMISSION 445 12th STREET SW WASHINGTON DC 20554

MEDIA BUREAU AUDIO DIVISION

APPLICATION STATUS: (202) 418-2730

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AUG 1 4 2018

Mr. Alan D. Cooper, Director Daily News Broadcasting Company P.O. Box 930 Bowling Green, KY 42102

Re: Daily News Broadcasting Company (DNBC)

WKCT(AM), Bowling Green, KY Facility Identification Number: 65589

File No. BP-20180409AAD

Dear Mr. Cooper:

This letter is in reference to the above-captioned minor change application to modify the license for WKCT to change class of station from B to D; to correct the site coordinates; and to change the nighttime antenna system from a three-tower directional system to the same system as used in the daytime, using only the center tower in the array.

A preliminary review of the Form 301 application reveals the following deficiencies:

- 1. The coordinates for the tower must be corrected to 37-deg., 02' 01"N; 86-deg., 26' 25"W. The coordinates when converted to NAD 27 are the same, based on a round-off resolution of one second.
- 2. The proposed nighttime facility increases the 25% RSS limits for three co-channel stations in violation of Section 73.182 of the Commission's rules. We estimate proposed power would have to be reduced below 0.060 kW to protect all other stations.
 - a. The existing RSS limit for WTAD(AM), Quincy, IL is 5.98 mV/m, and the proposal will increase the limit to 6.07 mV/m.
 - b. The existing RSS limit for KWOC(AM), Poplar Bluff, MO is 11.04 mV/m, and the proposal will increase the limit to 11.43 mV/m.²
 - c. The existing RSS limit for WRVC, Huntington, WV is 10.58 mV/m, and the

 $^{^1}$ The existing limit of WTAD(AM) is comprised of 3.71 mV/m rom WKY, 2.77 mV/m from WKBM, 2.23 mV/m from WFXJ, 1.90 mV/m from KPSZ, 1.87 mV/m from KKIN and 1.51 mV/m from WEOL.

 $^{^2}$ The existing limit of KWOC(AM) is comprised of 7.67 mV/m from WTAD, 4.93 mV/m from WRVC, 4.72 mV/m from WKBM and 4.07 mV/m from WKY.

proposal will increase the limit to 10.62 mV/m.³

Further action will be withheld for 30 days to allow time to amend the application and include the repaired technical exhibit. Failure to amend or respond within this time period will result in the dismissal of the application pursuant to Section 73.3568 of the Commission's rules.

Sincerely,

Son Nguyen

Supervisory Engineer

Audio Division

Media Bureau

CC: Mr. David Stewart

³ The existing limit of WRVC(AM) is comprised of 4.86 mV/m from WTAD, 3.93 mV/m from WEOL, 3.78 mV/m from WYFQ, 3.59 mV/m from WFMD, 3.40 mV/m from WPAT, 3.29 mV/m from WBEN, 3.09 mV/m from WKBM, 2.71 mV/m from WFXJ and 2.59 mV/m from WTOU.