Wiley Rein LLP

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McLEAN, VA 22102
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COPY

FCC/MELLON JUN 01 2007

June 1, 2007

Mark Lipp
202.719.7503
mlipp@wileyrein.com

**VIA MESSENGER**

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Media Bureau
P.O. Box 358190
Pittsburgh, Pennsylvania 15251-5190

Re: **Application for AM Broadcast Station License**
Brantley Broadcast Associates, LLC
Station WZFN(AM), Dilworth, Minnesota
Facility Identifier Number: 135930
File Number: BMP-20060824AAM

2007 JUN -8 P 2:47

Dear Ms. Dortch:

Transmitted herewith on behalf of Brantley Broadcast Associates, LLC ("Brantley"), the permittee of Station WZFN(AM), Dilworth, Minnesota, are an original and two copies of its application for an AM broadcast station license to cover the construction permit identified above.

If there are any questions about this Application, please contact undersigned counsel for Brantley Broadcast Associates, LLC.

Sincerely,

Mark Lipp

ML/dmk

cc: Ms. Susan Crawford, Audio Division, Media Bureau, FCC

Enclosure

12659800.1

Federal Communications Commission
Washington, D. C. 20554

Approved by OMB
3060-0627
Expires 01/31/98

FOR FCC USE ONLY

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

(Please read instructions before filling out form.

FOR COMMISSION USE ONLY

FILE NO.

## SECTION I - APPLICANT FEE INFORMATION

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

Wiley Rein LLP

MAILING ADDRESS (Line 1) (Maximum 35 characters)
1776 K Street, NW

MAILING ADDRESS (Line 2) (Maximum 35 characters)

| CITY | STATE OR COUNTRY (if foreign address) | ZIP CODE |
|---|---|---|
| Washington | DC | 20006 |

| TELEPHONE NUMBER (include area code) | CALL LETTERS | OTHER FCC IDENTIFIER (If applicable) |
|---|---|---|
| 202.719.7000 | WZFN(AM) | 135930 |

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):

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 |
|---|---|---|---|
| M M R | 0 0 0 1 | $ 585.00 | |

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 |
|---|---|---|---|
| M O R | 0 0 0 1 | $ 675.00 | |

| | TOTAL AMOUNT REMITTED WITH THIS APPLICATION | FOR FCC USE ONLY |
|---|---|---|
| ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE. | $ 1,260.00 | |

| SECTION II - APPLICANT INFORMATION | | |
|---|---|---|
| 1. NAME OF APPLICANT<br>Brantley Broadcast Associates, LLC | | |
| MAILING ADDRESS<br>6930 Cahaba Valley Road, Suite 202 | | |
| CITY<br>Birmingham | STATE<br>Alabama | ZIP CODE<br>35242 |

2. This application is for:

☑ Commercial ☐ Noncommercial

☑ AM Directional ☐ AM Non-Directional

| Call letters | Community of License | Construction Permit File No. | Modification of Construction Permit File No(s). | Expiration Date of Last Construction Permit |
|---|---|---|---|---|
| WZFN | Dilworth, MN | BNP-20010709ACD | BMP-20060824AAM | 6/1/2007 |

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.

Exhibit No. 1

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.

Exhibit No. 1

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.

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

☐ Does not apply

If No, explain in an Exhibit.

Exhibit No. 1

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.

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 | Signature | |
|---|---|---|
| Joan Reynolds | | |
| Title: Managing Member | Date: 6/1/2007 | Telephone Number: 205.618.2020 |

**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
BRANTLEY BROADCAST ASSOCIATES, 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 | |
|---|---|---|---|---|---|
| | | | | Night | Day |
| WZFN | BMP-20060824AAM | 1100 | UNLIMITED | 0.44 | 50.0 |

2. Station location

| State | City or Town |
|---|---|
| MINNESOTA | DILWORTH |

3. Transmitter location

| State | County | City or Town | Street address (or other identification) |
|---|---|---|---|
| MN | CLAY | SABIN | 2 KM SOUTHWEST OF SABIN |

4. Main studio location

| State | County | City or Town | Street address (or other identification) |
|---|---|---|---|
| | AS ABOVE | | |

5. Remote control point location (specify only if authorized directional antenna)

| State | County | City or Town | Street address (or other identification) |
|---|---|---|---|
| | AS ABOVE | | |

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.

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 |
|---|---|
| NOT COMPLETE | NOT COMPLETE |

| 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 |
| 50.0 | 50.0 | +J0.0 | +J106 |

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 |
| NOT COMPLETE | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

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. |
|---|---|---|---|---|
| SELF-SUPPORTING TOWER | 60.2 | 60.7 | 60.7 | Exhibit No. |

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 | West Longitude |
|---|---|
| 46 ° 45 ' 44 " | 96 ° 40 ' 19 " |

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.

N/A

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) | Signature (check appropriate box below) |
|---|---|
| JOHN R. FURR | |
| Address (include ZIP Code) | Date |
| PARADIGM ASSOCIATES, INC<br>8918 TESORO DRIVE, SUITE 501<br>SAN ANTONIO, TX 78217 | MAY 31, 2007 |
| | Telephone No. (Include Area Code)<br>210-828-4555 |

☐ Technical Director ☐ Registered Professional Engineer

☐ Chief Operator ☑ Technical Consultant

☐ Other (specify)

**Exhibit 1**
**WZFN(AM) License Application**

**Response to question 3 in Section II of 302-AM**
Station WZFN(AM), Dilworth, Minnesota, will operate directionally during nighttime hours. Special operating condition number one on the WZFN construction permit requires the submission of a complete, non-directional proof-of-performance before program tests are authorized.

**Response to question 4 in Section II of 302-AM**
Special operating condition number one requires a complete non-directional proof-of-performance. The non-directional measurements have not been completed yet. Directional measurements are submitted with this application. Brantley Broadcast Associates, LLC, intends to submit the non-directional measurements as soon as possible.

## ENGINEERING STATEMENT

Brantley Broadcast Associates, LLC ("Brantley") holds a permit to construct a new AM broadcast station at Dilworth, Minnesota (WZFN(CP), BMP-20060824AAM, BNP-20010709ACD, FCC ID number 135930). Construction of this facility is complete. Brantley has completed the non-directional field intensity measurements required to begin tuning up the nighttime directional array, and is now beginning the directional adjustments. Brantley is filing the instant application and reporting the results of the non-directional measurements pursuant to a tolling waiver.

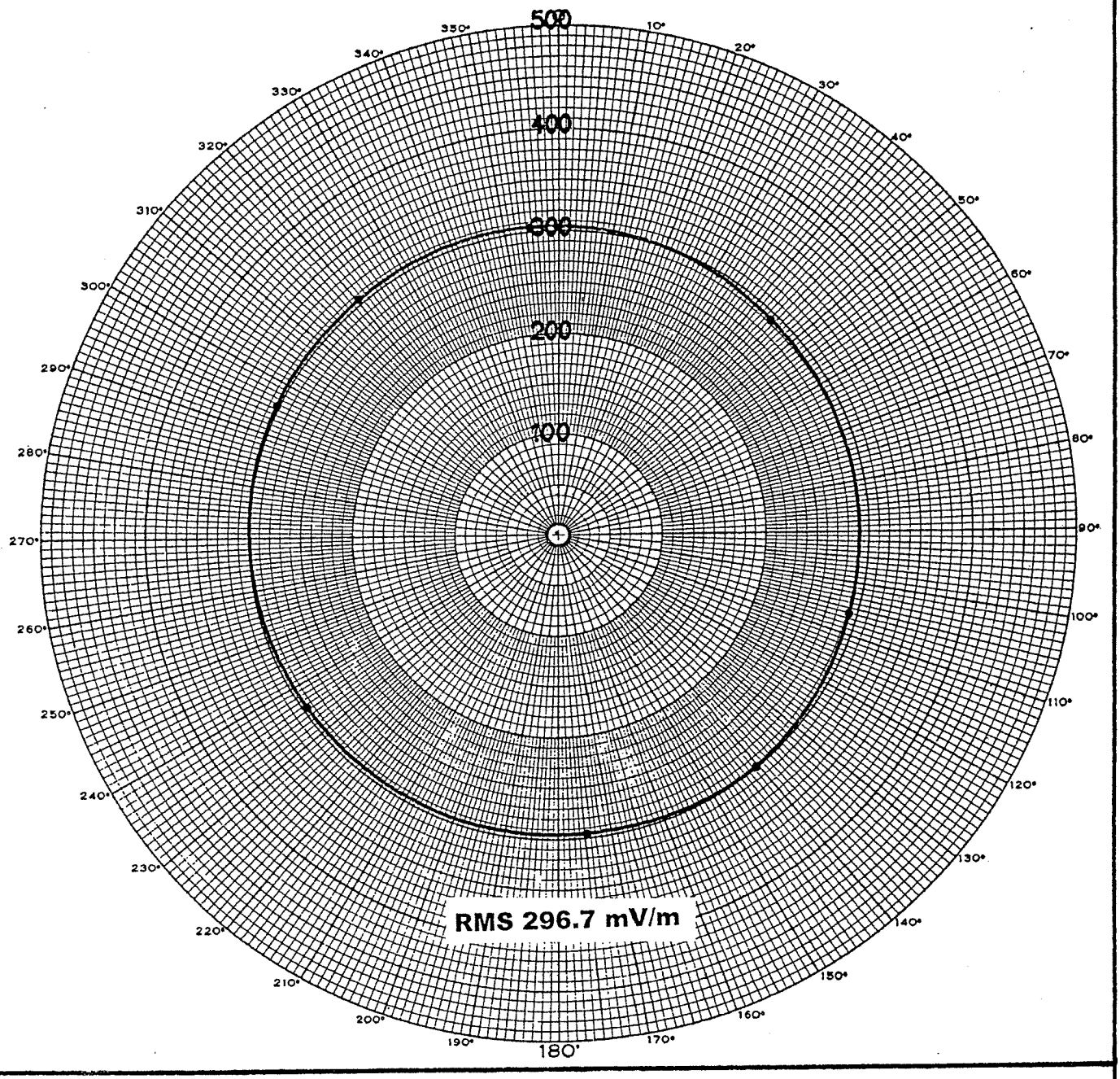
The northwest tower (the day/critical hours tower, number 1 in the permit) was driven for the non-directional measurements, the southwest tower first having been de-tuned with an isolating network at the base. The feedpoint resistance of this unipole-fed tower was determined to be 50.0 +j106 ohms. The impedance measurement was made utilizing a Delta Electronics OIB-3, serial number 929, driven by the transmitter. The accuracy of this instrument was checked against a known resistance. The drive current was adjusted to 4.47 amperes, as indicated on a Delta Electronics TCT 1-HVm, serial number 296, for an input power of 0.999 kW. This current was maintained closely during the non-directional measurements. The field intensity measurements were conducted utilizing two field intensity meters, both Potomac Instruments FIM-41 units. Serial number 1391 was last factory calibrated on 10 May, 2007. Serial number 898 was factory calibrated on 25 May, 1999. This meter had been previously compared to an FIM-21, serial number 1046, last factory calibrated on 13 February 2006, and was also compared to serial number 1391. It was found to agree closely with both meters (within approximately two percent). These meters were calibrated according to the manufacturer's instructions at each measurement location. The measurements were conducted by Mr. Lee Reynolds, with the assistance of Mr. Virgil Leon Strickland and Mr. Robert Williams. All of these individuals are experienced in making such measurements, and with the test equipment utilized.

Exhibit A is the polar plot of the analyzed inverse data obtained from the non-directional measurements. Exhibit B is a tabulation of the inverse distance field value determined in the analysis for each radial. Exhibits C and D contain the field intensity graphs and tabulations of the measured field intensity data, respectively.

The above and attached information is true and correct as to my knowledge and belief.

May 31, 2007

John R. Furr




Paradigm Associates, Inc.

**NON-DIRECTIONAL POLAR PLOT**

**WZFN**
**DILWORTH, MN**
**EXHIBIT A**

WZFN

Summary of Radials and Inverse Distance Fields

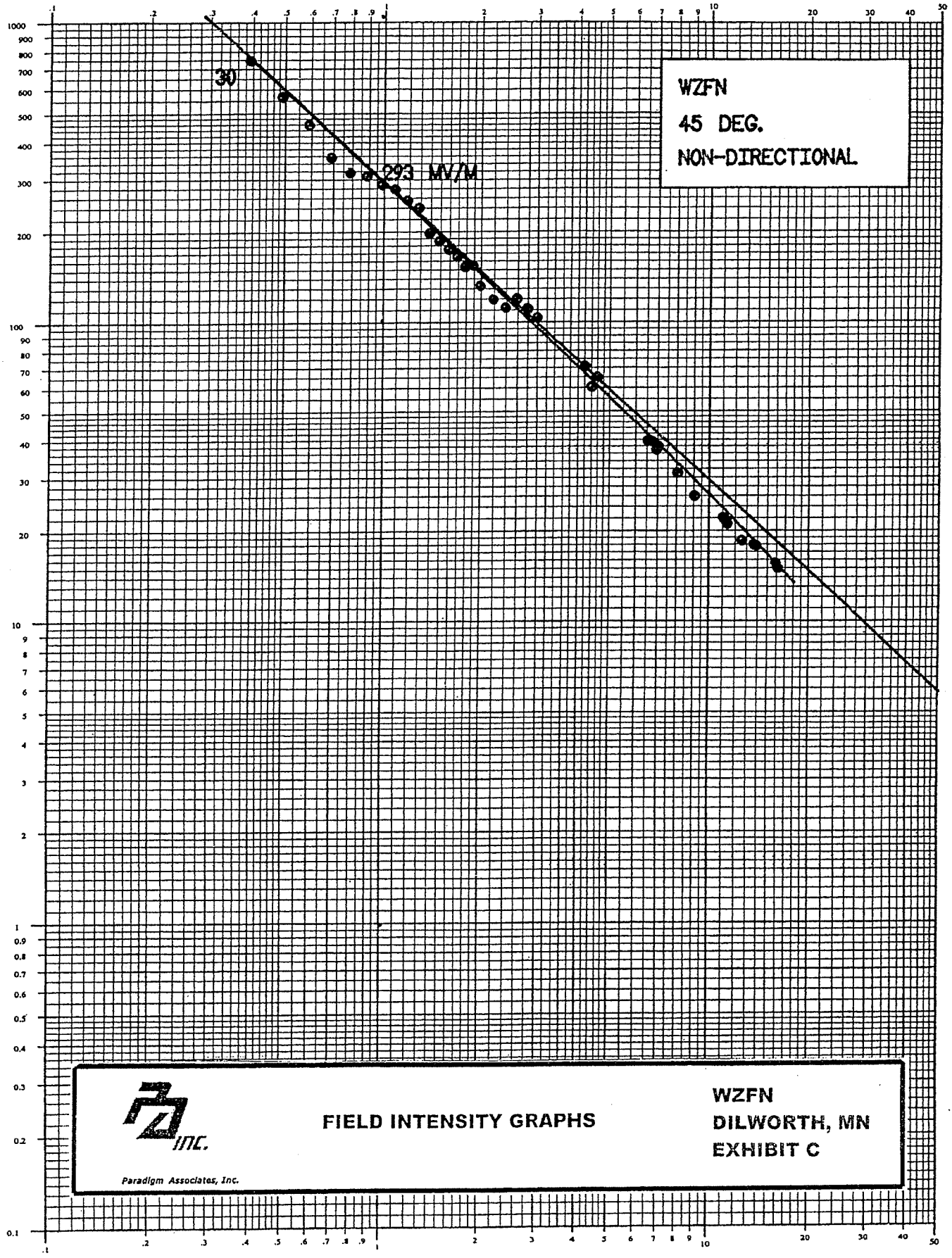
| No. | Radial (degree) | Inverse (mV/m) |
|---|---|---|
| 1. | 45.0 | 293.0 |
| 2. | 106.0 | 295.0 |
| 3. | 140.0 | 300.0 |
| 4. | 174.0 | 295.0 |
| 5. | 235.0 | 295.0 |
| 6. | 295.0 | 300.0 |
| 7. | 320.0 | 300.0 |
| 8. | 355.0 | 300.0 |

Measured RMS is 296.7 mV/m by use of sectoring

Paradigm Associates, Inc.

**INVERSE DISTANCE FIELDS TABULATION**

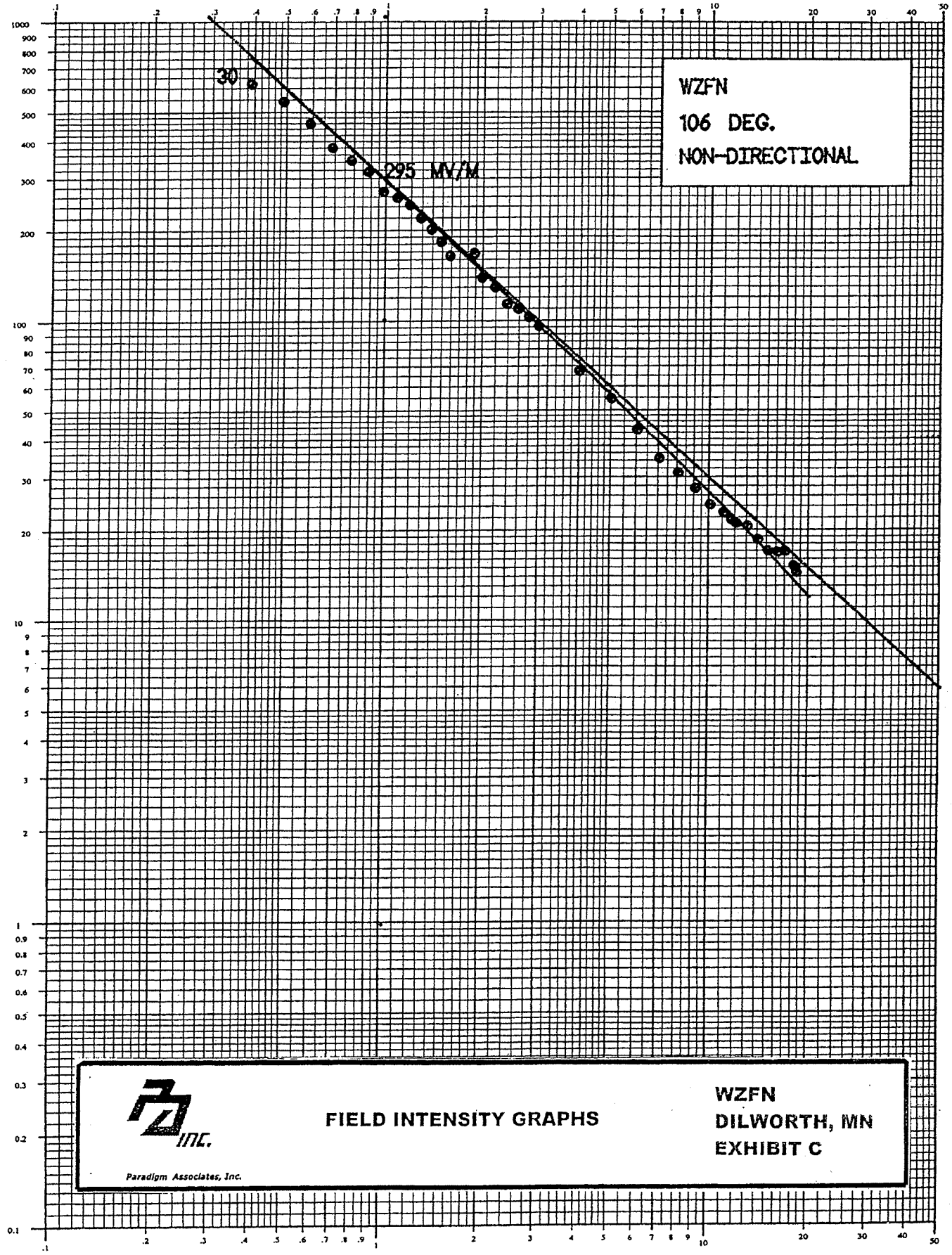
**WZFN**
**DILWORTH, MN**
**EXHIBIT B**




FIELD INTENSITY GRAPHS

WZFN
DILWORTH, MN
EXHIBIT C

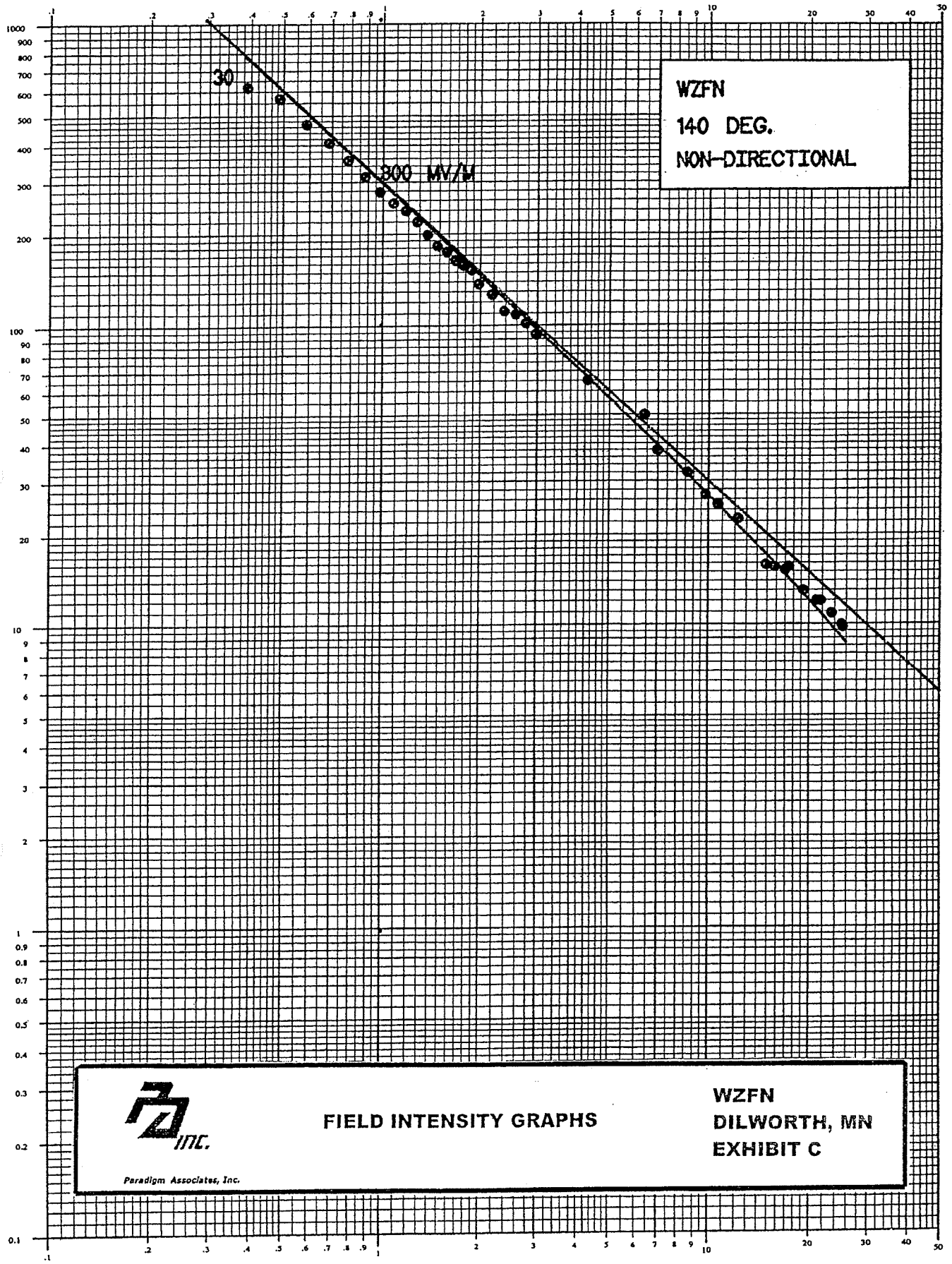
Paradigm Associates, Inc.




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

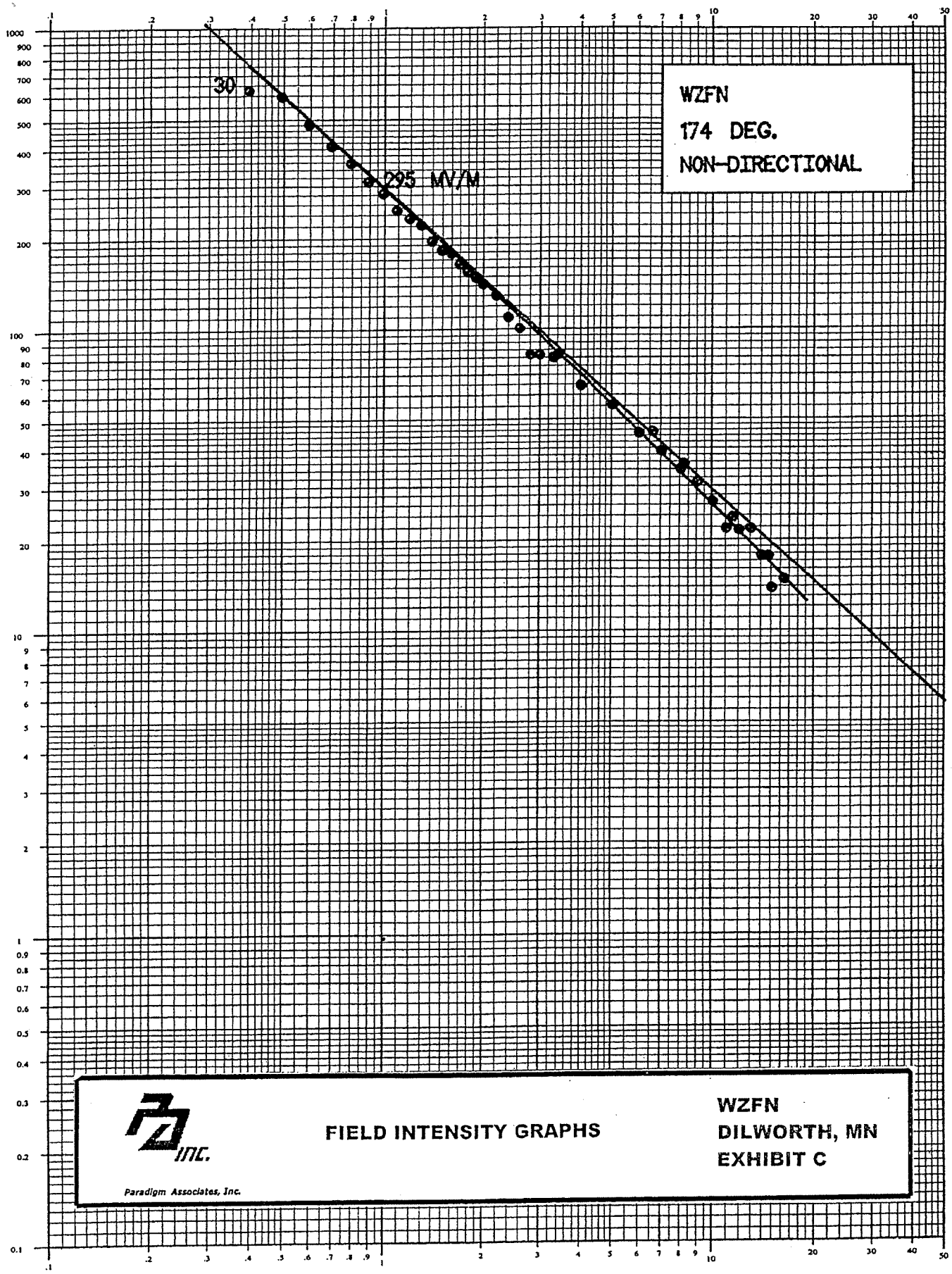
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

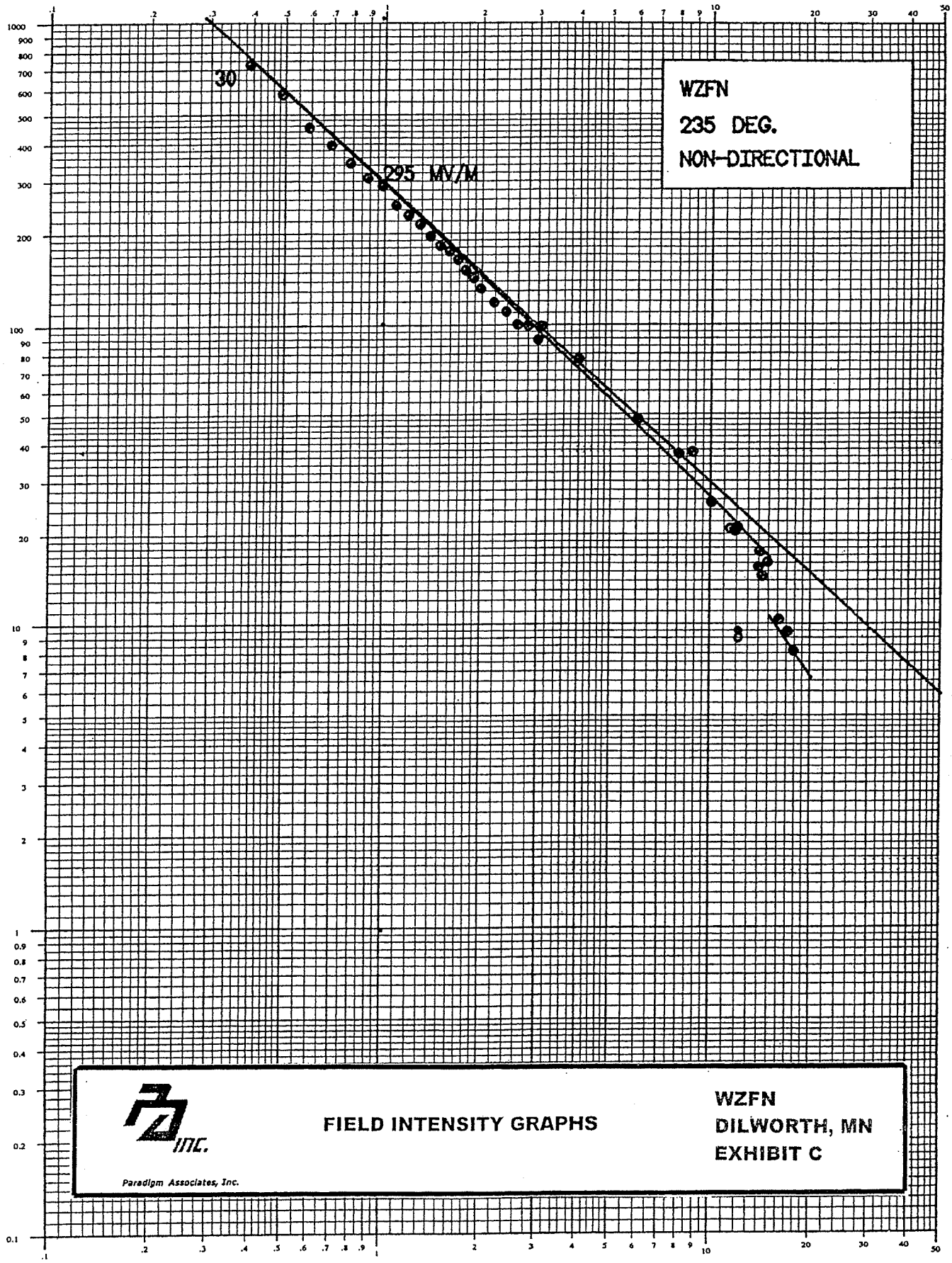
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

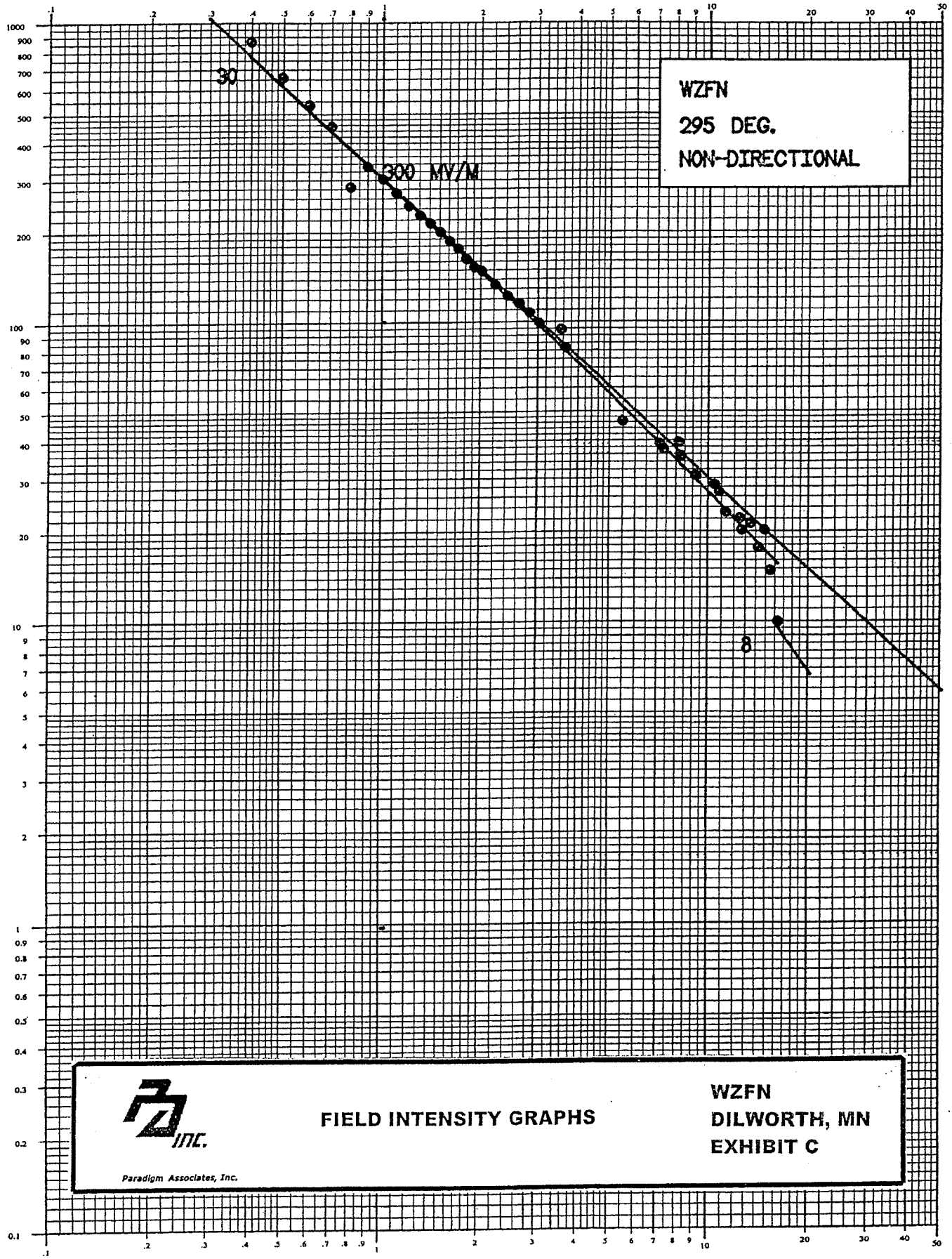
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

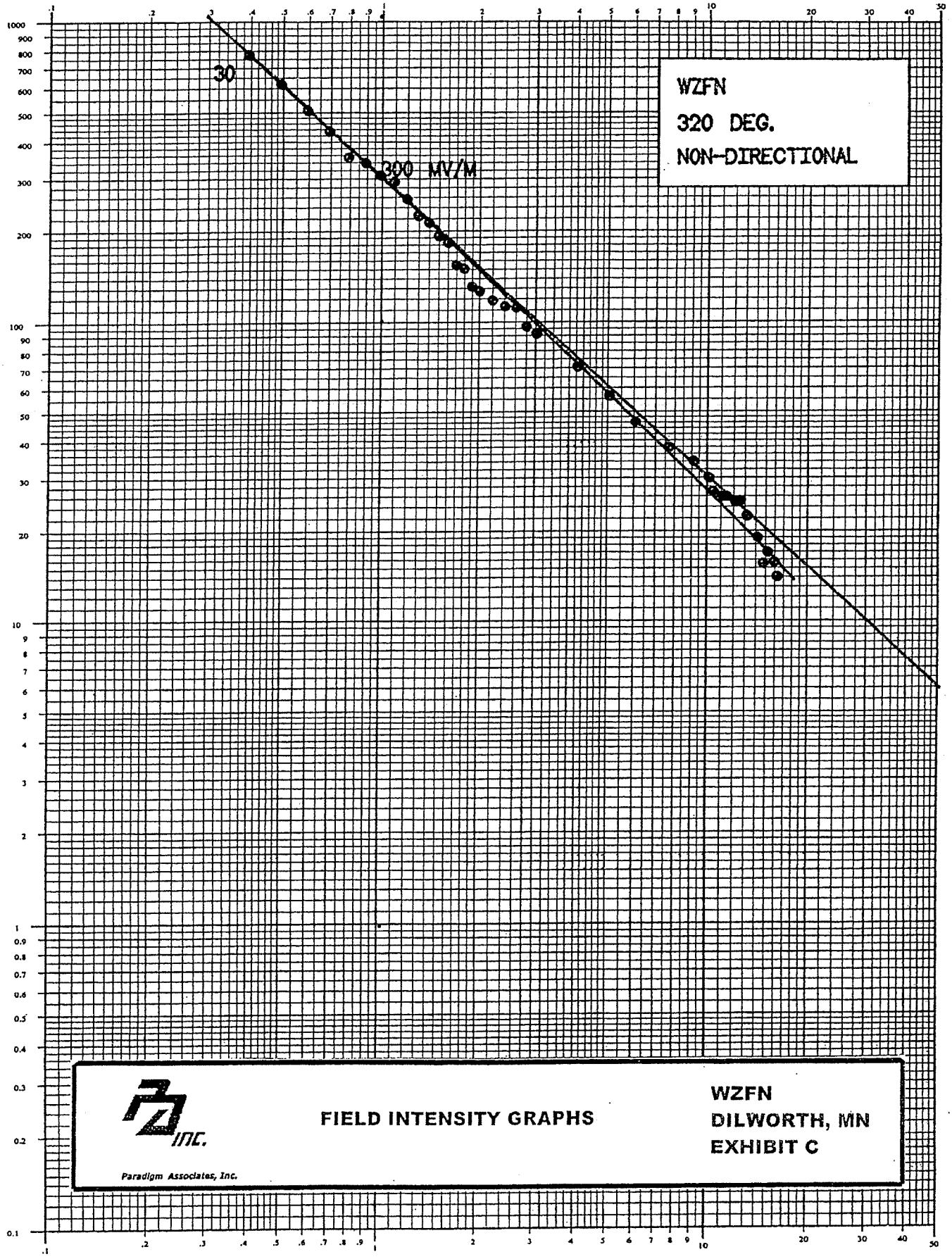
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

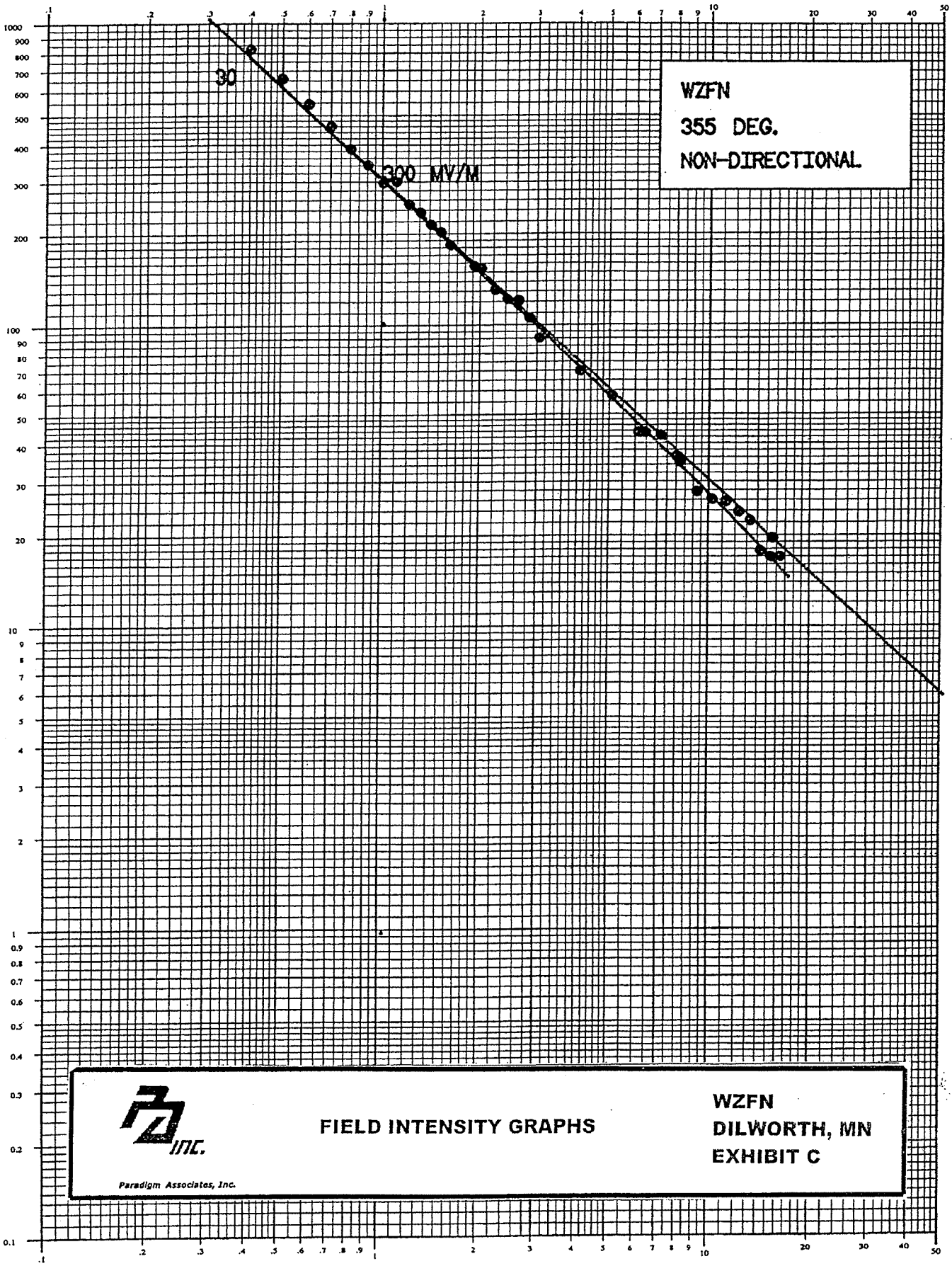
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

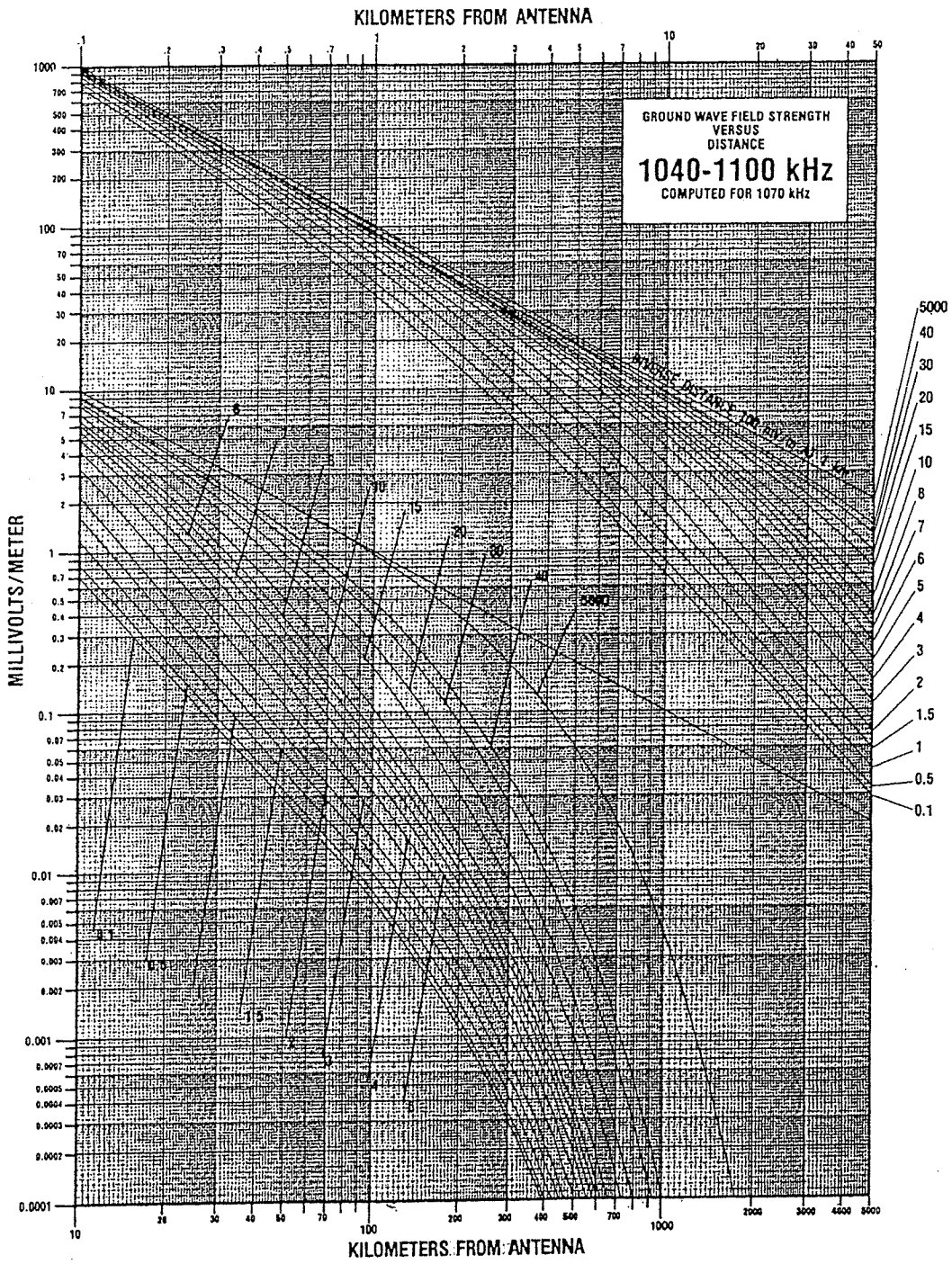
**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




Paradigm Associates, Inc.

**FIELD INTENSITY GRAPHS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT C**




**FIELD INTENSITY GRAPHS**
**FAMILY OF CURVES**

**WZFN**
**DILWORTH, MN**
**EXHIBIT C**

*Paradigm Associates, Inc.*

WZFN

YEAR: 2007
Non-D RADIAL 45.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 715 | 1415 | 5-29 |
| 2 | 0.50 | 545 | 1414 | 5-29 |
| 3 | 0.60 | 442 | 1413 | 5-29 |
| 4 | 0.70 | 345 | 1411 | 5-29 |
| 5 | 0.80 | 308 | 1410 | 5-29 |
| 6 | 0.90 | 300 | 1409 | 5-29 |
| 7 | 1.00 | 280 | 1408 | 5-29 |
| 8 | 1.10 | 271 | 1406 | 5-29 |
| 9 | 1.20 | 248 | 1403 | 5-29 |
| 10 | 1.30 | 235 | 1400 | 5-29 |
| 11 | 1.40 | 193 | 1357 | 5-29 |
| 12 | 1.50 | 182 | 1342 | 5-29 |
| 13 | 1.60 | 171 | 1338 | 5-29 |
| 14 | 1.70 | 162 | 1335 | 5-29 |
| 15 | 1.80 | 150 | 1333 | 5-29 |
| 16 | 1.90 | 152 | 1329 | 5-29 |
| 17 | 2.00 | 130 | 1327 | 5-29 |
| 18 | 2.20 | 117 | 1321 | 5-29 |
| 19 | 2.40 | 110 | 1315 | 5-29 |
| 20 | 2.60 | 118 | 1309 | 5-29 |
| 21 | 2.80 | 109 | 1305 | 5-29 |
| 22 | 3.00 | 102 | 1302 | 5-29 |
| 23 | 4.20 | 70 | 0950 | 5-29 |
| 24 | 4.40 | 60 | 1353 | 5-30 |
| 25 | 4.60 | 65 | 0953 | 5-31 |
| 26 | 6.50 | 40 | 1011 | 5-30 |
| 27 | 6.70 | 40 | 1406 | 5-30 |
| 28 | 6.90 | 37 | 1017 | 5-30 |
| 29 | 7.00 | 38 | 1416 | 5-30 |
| 30 | 8.00 | 31 | 1340 | 5-30 |
| 31 | 9.00 | 26 | 1240 | 5-30 |
| 32 | 11.00 | 22 | 1025 | 5-31 |
| 33 | 11.20 | 22 | 1420 | 5-30 |
| 34 | 11.30 | 21 | 1031 | 5-30 |
| 35 | 12.50 | 19 | 1249 | 5-30 |
| 36 | 13.60 | 18 | 1045 | 5-30 |
| 37 | 13.80 | 18 | 1051 | 5-30 |
| 38 | 15.80 | 16 | 1106 | 5-31 |
| 39 | 16.00 | 15 | 1314 | 5-30 |

Radial Inverse: 293 mV/m

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

Paradigm Associates, Inc.

WZFN

YEAR: 2007
Non-D RADIAL 106.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 600 | 1559 | 5-28 |
| 2 | 0.50 | 525 | 1604 | 5-28 |
| 3 | 0.60 | 445 | 1606 | 5-28 |
| 4 | 0.70 | 370 | 1613 | 5-28 |
| 5 | 0.80 | 335 | 1618 | 5-28 |
| 6 | 0.90 | 308 | 1621 | 5-28 |
| 7 | 1.00 | 265 | 1626 | 5-28 |
| 8 | 1.10 | 252 | 1630 | 5-28 |
| 9 | 1.20 | 238 | 1635 | 5-28 |
| 10 | 1.30 | 215 | 1639 | 5-28 |
| 11 | 1.40 | 197 | 1644 | 5-28 |
| 12 | 1.50 | 180 | 1648 | 5-28 |
| 13 | 1.60 | 162 | 1652 | 5-28 |
| 14 | 1.90 | 165 | 1711 | 5-28 |
| 15 | 2.00 | 137 | 1715 | 5-28 |
| 16 | 2.20 | 127 | 1718 | 5-28 |
| 17 | 2.40 | 112 | 1722 | 5-28 |
| 18 | 2.60 | 108 | 1727 | 5-28 |
| 19 | 2.80 | 101 | 1734 | 5-28 |
| 20 | 3.00 | 94 | 1022 | 5-28 |
| 21 | 4.00 | 67 | 1032 | 5-28 |
| 22 | 5.00 | 55 | 1042 | 5-28 |
| 23 | 6.00 | 43 | 1053 | 5-28 |
| 24 | 7.00 | 35 | 1153 | 5-28 |
| 25 | 8.00 | 31 | 1117 | 5-28 |
| 26 | 9.00 | 28 | 1138 | 5-28 |
| 27 | 10.00 | 24 | 1200 | 5-28 |
| 28 | 11.00 | 23 | 1218 | 5-28 |
| 29 | 11.60 | 22 | 1121 | 5-31 |
| 30 | 12.00 | 21 | 1231 | 5-28 |
| 31 | 13.00 | 21 | 1240 | 5-28 |
| 32 | 14.00 | 19 | 1306 | 5-28 |
| 33 | 15.00 | 17 | 1321 | 5-28 |
| 34 | 16.00 | 17 | 1337 | 5-28 |
| 35 | 16.90 | 17 | 1139 | 5-31 |
| 36 | 18.00 | 15 | 1145 | 5-31 |
| 37 | 18.30 | 14 | 1148 | 5-31 |

Radial Inverse: 295 mV/m

WZFN

YEAR: 2007
Non-D RADIAL 140.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 600 | 1519 | 5-29 |
| 2 | 0.50 | 550 | 1522 | 5-29 |
| 3 | 0.60 | 455 | 1525 | 5-29 |
| 4 | 0.70 | 395 | 1528 | 5-29 |
| 5 | 0.80 | 345 | 1532 | 5-29 |
| 6 | 0.90 | 305 | 1538 | 5-29 |
| 7 | 1.00 | 272 | 1542 | 5-29 |
| 8 | 1.10 | 249 | 1547 | 5-29 |
| 9 | 1.20 | 235 | 1552 | 5-29 |
| 10 | 1.30 | 215 | 1557 | 5-29 |
| 11 | 1.40 | 195 | 1601 | 5-29 |
| 12 | 1.50 | 180 | 1605 | 5-29 |
| 13 | 1.60 | 172 | 1610 | 5-29 |
| 14 | 1.70 | 161 | 1614 | 5-29 |
| 15 | 1.80 | 155 | 1619 | 5-29 |
| 16 | 1.90 | 150 | 1625 | 5-29 |
| 17 | 2.00 | 135 | 1630 | 5-29 |
| 18 | 2.20 | 125 | 1634 | 5-29 |
| 19 | 2.40 | 110 | 1639 | 5-29 |
| 20 | 2.60 | 107 | 1643 | 5-29 |
| 21 | 2.80 | 100 | 1647 | 5-29 |
| 22 | 3.00 | 92 | 1651 | 5-29 |
| 23 | 4.30 | 65 | 1750 | 5-30 |
| 24 | 6.40 | 50 | 1325 | 5-31 |
| 25 | 7.00 | 38 | 1128 | 5-30 |
| 26 | 8.60 | 32 | 1317 | 5-31 |
| 27 | 9.80 | 27 | 1335 | 5-31 |
| 28 | 10.70 | 25 | 1114 | 5-30 |
| 29 | 12.30 | 23 | 1153 | 5-30 |
| 30 | 14.90 | 16 | 1310 | 5-31 |
| 31 | 15.80 | 16 | 1106 | 5-31 |
| 32 | 17.00 | 15 | 1306 | 5-31 |
| 33 | 17.40 | 16 | 1302 | 5-31 |
| 34 | 19.30 | 13 | 1240 | 5-31 |
| 35 | 21.20 | 12 | 1235 | 5-31 |
| 36 | 21.80 | 12 | 1231 | 5-31 |
| 37 | 23.50 | 11 | 1225 | 5-31 |
| 38 | 25.20 | 10 | 1209 | 5-31 |
| 39 | 25.40 | 9.8 | 1214 | 5-31 |

Radial Inverse: 300 mV/m

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

Paradigm Associates, Inc.

WZFN

YEAR: 2007
Non-D RADIAL 174.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 610 | 1601 | 5-28 |
| 2 | 0.50 | 580 | 1605 | 5-28 |
| 3 | 0.60 | 470 | 1608 | 5-28 |
| 4 | 0.70 | 400 | 1610 | 5-28 |
| 5 | 0.80 | 350 | 1613 | 5-28 |
| 6 | 0.90 | 305 | 1615 | 5-28 |
| 7 | 1.00 | 279 | 1618 | 5-28 |
| 8 | 1.10 | 245 | 1621 | 5-28 |
| 9 | 1.20 | 230 | 1624 | 5-28 |
| 10 | 1.30 | 219 | 1626 | 5-28 |
| 11 | 1.40 | 194 | 1629 | 5-28 |
| 12 | 1.50 | 181 | 1632 | 5-28 |
| 13 | 1.60 | 177 | 1635 | 5-28 |
| 14 | 1.70 | 163 | 1638 | 5-28 |
| 15 | 1.80 | 154 | 1643 | 5-28 |
| 16 | 1.90 | 148 | 1646 | 5-28 |
| 17 | 2.00 | 141 | 1649 | 5-28 |
| 18 | 2.20 | 129 | 1653 | 5-28 |
| 19 | 2.40 | 109 | 1657 | 5-28 |
| 20 | 2.60 | 100 | 1702 | 5-28 |
| 21 | 2.80 | 82 | 1707 | 5-28 |
| 22 | 3.00 | 82 | 1023 | 5-28 |
| 23 | 3.30 | 80 | 1755 | 5-30 |
| 24 | 3.40 | 82 | 1330 | 5-31 |
| 25 | 4.00 | 65 | 1051 | 5-28 |
| 26 | 5.00 | 56 | 1120 | 5-28 |
| 27 | 6.00 | 46 | 1137 | 5-28 |
| 28 | 6.60 | 46 | 1257 | 5-31 |
| 29 | 7.00 | 40 | 1219 | 5-28 |
| 30 | 8.00 | 35 | 1235 | 5-28 |
| 31 | 8.20 | 36 | 1250 | 5-31 |
| 32 | 9.00 | 32 | 1251 | 5-28 |
| 33 | 10.00 | 27 | 1308 | 5-28 |
| 34 | 11.00 | 22 | 1324 | 5-28 |
| 35 | 11.50 | 24 | 1244 | 5-31 |
| 36 | 12.00 | 22 | 1338 | 5-28 |
| 37 | 13.00 | 22 | 1354 | 5-28 |
| 38 | 14.00 | 18 | 1405 | 5-28 |
| 39 | 14.70 | 18 | 1317 | 5-31 |
| 40 | 15.00 | 14 | 1420 | 5-28 |
| 41 | 16.30 | 15 | 1311 | 5-31 |

Radial Inverse: 295 mV/m

Paradigm Associates, Inc.

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

WZFN

YEAR: 2007
Non-D RADIAL 235.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 700 | 1309 | 5-29 |
| 2 | 0.50 | 560 | 1312 | 5-29 |
| 3 | 0.60 | 440 | 1316 | 5-29 |
| 4 | 0.70 | 385 | 1325 | 5-29 |
| 5 | 0.80 | 335 | 1329 | 5-29 |
| 6 | 0.90 | 300 | 1333 | 5-29 |
| 7 | 1.00 | 282 | 1338 | 5-29 |
| 8 | 1.10 | 243 | 1443 | 5-29 |
| 9 | 1.20 | 225 | 1346 | 5-29 |
| 10 | 1.30 | 210 | 1350 | 5-29 |
| 11 | 1.40 | 192 | 1353 | 5-29 |
| 12 | 1.50 | 179 | 1356 | 5-29 |
| 13 | 1.60 | 172 | 1359 | 5-29 |
| 14 | 1.70 | 161 | 1401 | 5-29 |
| 15 | 1.80 | 149 | 1404 | 5-29 |
| 16 | 1.90 | 141 | 1407 | 5-29 |
| 17 | 2.00 | 130 | 1410 | 5-29 |
| 18 | 2.20 | 117 | 1419 | 5-29 |
| 19 | 2.40 | 109 | 1424 | 5-29 |
| 20 | 2.60 | 99 | 1429 | 5-29 |
| 21 | 2.80 | 98 | 1433 | 5-29 |
| 22 | 3.00 | 88 | 1438 | 5-29 |
| 23 | 3.10 | 98 | 1338 | 5-31 |
| 24 | 4.00 | 76 | 1338 | 5-30 |
| 25 | 6.00 | 48 | 1320 | 5-30 |
| 26 | 8.00 | 37 | 1311 | 5-30 |
| 27 | 8.80 | 37 | 1110 | 5-31 |
| 28 | 10.00 | 26 | 1305 | 5-30 |
| 29 | 11.40 | 21 | 1129 | 5-31 |
| 30 | 11.80 | 21 | 1130 | 5-31 |
| 31 | 12.00 | 21 | 1241 | 5-30 |
| 32 | 13.90 | 16 | 1150 | 5-31 |
| 33 | 14.00 | 18 | 1223 | 5-30 |
| 34 | 14.20 | 15 | 1145 | 5-31 |
| 35 | 14.80 | 16 | 1217 | 5-31 |
| 36 | 16.00 | 10 | 1205 | 5-30 |
| 37 | 17.00 | 9.5 | 1205 | 5-31 |
| 38 | 17.70 | 8.2 | 1209 | 5-31 |

Radial Inverse: 295 mV/m

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

*Paradigm Associates, Inc.*

WZFN

YEAR: 2007
Non-D RADIAL 295.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 840 | 1006 | 5-30 |
| 2 | 0.50 | 640 | 1009 | 5-30 |
| 3 | 0.60 | 520 | 1012 | 5-30 |
| 4 | 0.70 | 445 | 1014 | 5-30 |
| 5 | 0.80 | 280 | 1017 | 5-30 |
| 6 | 0.90 | 328 | 1019 | 5-30 |
| 7 | 1.00 | 297 | 1022 | 5-30 |
| 8 | 1.10 | 268 | 1025 | 5-30 |
| 9 | 1.20 | 242 | 1028 | 5-30 |
| 10 | 1.30 | 225 | 1031 | 5-30 |
| 11 | 1.40 | 212 | 1037 | 5-30 |
| 12 | 1.50 | 198 | 1051 | 5-30 |
| 13 | 1.60 | 185 | 1055 | 5-30 |
| 14 | 1.70 | 175 | 1059 | 5-30 |
| 15 | 1.80 | 162 | 1103 | 5-30 |
| 16 | 1.90 | 152 | 1107 | 5-30 |
| 17 | 2.00 | 148 | 1111 | 5-30 |
| 18 | 2.20 | 133 | 1117 | 5-30 |
| 19 | 2.40 | 122 | 1123 | 5-30 |
| 20 | 2.60 | 115 | 1127 | 5-30 |
| 21 | 2.80 | 107 | 1133 | 5-30 |
| 22 | 3.00 | 99 | 1138 | 5-30 |
| 23 | 3.50 | 94 | 1816 | 5-30 |
| 24 | 3.60 | 82 | 1355 | 5-31 |
| 25 | 5.40 | 47 | 1023 | 5-30 |
| 26 | 7.00 | 40 | 1035 | 5-30 |
| 27 | 7.20 | 38 | 1104 | 5-31 |
| 28 | 8.00 | 40 | 1042 | 5-30 |
| 29 | 8.10 | 36 | 1057 | 5-31 |
| 30 | 9.00 | 31 | 1050 | 5-30 |
| 31 | 10.30 | 29 | 1048 | 5-31 |
| 32 | 10.60 | 27 | 1045 | 5-31 |
| 33 | 11.10 | 24 | 1038 | 5-31 |
| 34 | 12.30 | 22 | 1030 | 5-31 |
| 35 | 12.40 | 21 | 1059 | 5-30 |
| 36 | 13.20 | 22 | 1023 | 5-31 |
| 37 | 14.00 | 18 | 1107 | 5-30 |
| 38 | 14.60 | 21 | 1012 | 5-31 |
| 39 | 15.20 | 15 | 1113 | 5-30 |
| 40 | 16.00 | 10 | 1124 | 5-30 |

Radial Inverse: 300 mV/m

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

Paradigm Associates, Inc.

WZFN

YEAR: 2007
Non-D RADIAL 320.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 745 | 1853 | 5-28 |
| 2 | 0.50 | 595 | 1901 | 5-28 |
| 3 | 0.60 | 490 | 1904 | 5-28 |
| 4 | 0.70 | 420 | 1911 | 5-28 |
| 5 | 0.80 | 344 | 1915 | 5-28 |
| 6 | 0.90 | 330 | 1919 | 5-28 |
| 7 | 1.00 | 300 | 1922 | 5-28 |
| 8 | 1.10 | 285 | 1928 | 5-28 |
| 9 | 1.20 | 250 | 1933 | 5-28 |
| 10 | 1.30 | 220 | 1942 | 5-28 |
| 11 | 1.40 | 209 | 1945 | 5-28 |
| 12 | 1.50 | 189 | 1949 | 5-28 |
| 13 | 1.60 | 180 | 1954 | 5-28 |
| 14 | 1.70 | 152 | 2008 | 5-28 |
| 15 | 1.80 | 148 | 2012 | 5-28 |
| 16 | 1.90 | 129 | 2015 | 5-28 |
| 17 | 2.00 | 125 | 2017 | 5-28 |
| 18 | 2.20 | 116 | 2032 | 5-28 |
| 19 | 2.40 | 111 | 2035 | 5-28 |
| 20 | 2.60 | 110 | 2045 | 5-28 |
| 21 | 2.80 | 95 | 2047 | 5-28 |
| 22 | 3.00 | 90 | 2050 | 5-28 |
| 23 | 4.00 | 70 | 1517 | 5-27 |
| 24 | 5.00 | 56 | 1523 | 5-27 |
| 25 | 6.00 | 46 | 1529 | 5-27 |
| 26 | 7.60 | 38 | 1828 | 5-30 |
| 27 | 9.00 | 34 | 1533 | 5-27 |
| 28 | 10.00 | 30 | 1544 | 5-27 |
| 29 | 10.30 | 27 | 1852 | 5-30 |
| 30 | 11.00 | 26 | 1613 | 5-27 |
| 31 | 11.30 | 26 | 1856 | 5-30 |
| 32 | 12.00 | 25 | 1626 | 5-27 |
| 33 | 12.40 | 25 | 1902 | 5-30 |
| 34 | 13.00 | 22 | 1643 | 5-27 |
| 35 | 14.00 | 19 | 1653 | 5-27 |
| 36 | 14.50 | 16 | 1910 | 5-30 |
| 37 | 15.00 | 17 | 1704 | 5-27 |
| 38 | 15.70 | 16 | 1918 | 5-30 |
| 39 | 16.00 | 14 | 1716 | 5-27 |

Radial Inverse: 300 mV/m

Paradigm Associates, Inc.

**NON-DIRECTIONAL**
**FIELD INTENSITY TABULATIONS**

**WZFN**
**DILWORTH, MN**
**EXHIBIT D**

WZFN

YEAR: 2007
Non-D RADIAL 355.0

| POINT | DISTANCE (km) | N-DA (mV/m) | TIME (CDT) | DATE |
|---|---|---|---|---|
| 1 | 0.40 | 800 | 1845 | 5-29 |
| 2 | 0.50 | 640 | 1850 | 5-29 |
| 3 | 0.60 | 530 | 1853 | 5-29 |
| 4 | 0.70 | 450 | 1858 | 5-29 |
| 5 | 0.80 | 380 | 1901 | 5-29 |
| 6 | 0.90 | 335 | 1904 | 5-29 |
| 7 | 1.00 | 292 | 1907 | 5-29 |
| 8 | 1.10 | 295 | 1911 | 5-29 |
| 9 | 1.20 | 248 | 1915 | 5-29 |
| 10 | 1.30 | 233 | 1920 | 5-29 |
| 11 | 1.40 | 212 | 1923 | 5-29 |
| 12 | 1.50 | 200 | 1928 | 5-29 |
| 13 | 1.60 | 182 | 1931 | 5-29 |
| 14 | 1.90 | 155 | 1945 | 5-29 |
| 15 | 2.00 | 153 | 1949 | 5-29 |
| 16 | 2.20 | 130 | 1953 | 5-29 |
| 17 | 2.40 | 121 | 1957 | 5-29 |
| 18 | 2.60 | 120 | 2002 | 5-29 |
| 19 | 2.80 | 105 | 2008 | 5-29 |
| 20 | 3.00 | 90 | 1519 | 5-27 |
| 21 | 4.00 | 70 | 1537 | 5-27 |
| 22 | 5.00 | 58 | 1559 | 5-27 |
| 23 | 6.00 | 44 | 1619 | 5-27 |
| 24 | 6.30 | 44 | 1835 | 5-30 |
| 25 | 7.00 | 43 | 1626 | 5-27 |
| 26 | 7.80 | 37 | 1843 | 5-30 |
| 27 | 8.00 | 35 | 1640 | 5-27 |
| 28 | 9.00 | 28 | 1654 | 5-27 |
| 29 | 10.00 | 27 | 1717 | 5-27 |
| 30 | 11.00 | 26 | 1745 | 5-27 |
| 31 | 12.00 | 24 | 1848 | 5-27 |
| 32 | 13.00 | 23 | 1833 | 5-27 |
| 33 | 14.00 | 18 | 1918 | 5-27 |
| 34 | 15.00 | 17 | 1948 | 5-27 |
| 35 | 15.20 | 20 | 1700 | 5-30 |
| 36 | 16.00 | 17 | 1956 | 5-27 |

Radial Inverse: 300 mV/m

## STATEMENT OF VIRGLE LEON STRICKLAND

I, Virgle Leon Strickland, state that I am a holder of an FCC General Radio Telephone Operator License, PG-6-24807. I am familiar with the model FIM-41 Potomac Instrument, Inc. Field Strength Meter, and I have used this type meter several times in the past 20 years. I further state that I have been actively involved in broadcast engineering since 1980 and that my qualifications are known to the Federal Communications Commission. Robert E. Williams and I made all the field strength measurements for WZFN for the daytime after detuning the tower used for the nighttime directional pattern.

The spacing and location of roads in the area surrounding the transmitter site are generally spaced one (1) mile apart both north to south and east to west. When considering the selected radials (45, 106, 140, 174, 235, 295 and 320 degrees) to be used for the field strength measurements, we determined that too few measuring points would intersect with roads within sixteen (16) kilometers of the transmitter site. We decided to establish the location of each measurement point at one (1) kilometer intervals, from three (3) to sixteen (16) kilometers for each of the azimuths.

The area around the transmitter site had recently received an excessive amount of rainfall, making the soil in the fields in the immediate area around the transmitter site boggy and virtually inaccessible as needed to make the walk-in field strength measurements. The 320 and 295 degree radials appeared to have the driest soil from three (3) to sixteen (16) kilometers, so we chose to make those measurements first. They were completed Sunday, May 27, 2007. On the morning of Monday, May 28, 2007, measurements were made on the 106 and 174 degrees, from three to sixteen kilometers. In the afternoon, with the immediate surrounding area of the transmitter site less boggy, the walk-in measurements for 106, 174 and 320 degrees were completed. On Tuesday, May 29, 2007, the walk-in measurements for 45, 140, 235 and 295 degrees were completed. Rainfall was in the area late Tuesday afternoon. On Wednesday, May 30, 2007, the three (3) to sixteen (16) measurements were made for 45, 140, 235 and 295 degrees. That afternoon, it was determined that the required amount of measurement points were coming up short and some were intermittent (mostly where the radials intersects with roads were made). The intermittent measurements were not completed mostly due to rainfall in the area late Wednesday afternoon. On Thursday, May 31, 2007, the intermittent measurements from three (3) to sixteen (16) kilometers were completed for the 45, 140, 174, 325 and 295 radials.

Virgle Leon Strickland

June 1, 2007

## STATEMENT OF ROBERT E. WILLIAMS

I, Robert E. Williams, certify that I have been a holder of an FCC General Radio Telephone Operator license since 1985 and that I have more than twenty years experience in broadcast engineering. Additionally, I have had many hours and been involved in several projects using the FIM-41 Potomac Instrument, Inc. Field Strength Meter.

On May 28th through May 31st I assisted in performing field strength measurements for WZFN(AM), Dilworth, Minnesota. Due to the layout of the roads in the area around the transmitter site (the run north to south and east to west at approximately 1 mile (1.6 kilometer) intervals), it was determined that there would not be enough measuring points in the three to sixteen kilometers distances if measurements were taken only at points accessible by roads. It was decided to make every effort to make the measurements at the exact 1 kilometer interval points. These points were plotted on USGS topographic 7.5 minute maps, as well as in a computer mapping program (Map-Info). The coordinates were located by walking through the fields to the correct GPS coordinates. Due to weather conditions, these measurements and the 0.4 to the 3.0 kilometers measurements were performed first. Then, as weather conditions permitted, measurements were taken from the roads. The 0.4 to the 3.0 kilometers measurements were taken by walking through the fields to the correct distance and bearing as indicated on the GPS unit.

All field strength measurements were taken following the instructions supplied by Potomac Instrument, Inc. Therefore, I am able to certify those measurements to be accurate. Additionally, I certify that the location of each point of measurement is accurate to the best of my knowledge.

Robert E, Williams

June 1, 2007

STATEMENT OF PAUL H. REYNOLDS

I, Paul H. Reynolds, do hereby certify that I am a principal of Brantley Broadcast Associates, LLC ("BBA"), the permittee of WZFN(AM), Dilworth, Minnesota. The following statements are factual to the best of my knowledge and are made with first hand experience since I have been personally involved with the construction and field testing of WZFN.

1. The Dilworth/Moorehead/Sabin, MN area has experienced an unexpected amount of spring rainfall, which has exacerbated the muddy conditions in the farm lands in and around the WZFN transmitter site. The same is true for the entire Red River Valley region of Minnesota and North Dakota. In fact, there have only been brief periods of time during which area farmers could complete soil preparation and planting. Currently, many fields remain unplanted or will require replanting due to the continuing conditions.

2. BBA used the short periods of dry soil to complete construction of WZFN and prepare for the testing required for an AM station. Immediately after the WZFN construction was completed, the transmitter site area experienced another period of rain. Being totally unfamiliar with the soil properties in the Red River Valley area, BBA relied on the input of the transmitter property owner and other area farmers.

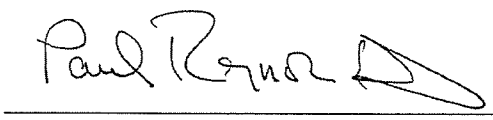
3. Using this information, it was determined that a limited amount of the area farm land needed for making field strength readings was accessible on Sunday May 27th. The BBA crews began their measurements in a random manner dictated by higher elevation property on radials 106 and 174.

4. All farmland within a 30 kilometer radius of the WZFN transmitter site is blocked into sections, with dirt access roads creating a series of one mile grids. Therefore, it is impossible to make field strength readings using only road access points and still get the required number unless the radius were expanded to 40 to 50 kilometers on the majority of radials. Therefore, BBA chose to make readings from 3 to 20 kilometers at the exact 1 kilometer reference points where farm soil conditions would allow. These points were supplemented with points that were easier to access.

5. Even though the three kilometer radius of the tower continued to be muddy on Monday, May 28th, BBA consulted with the property owner (who either owns or leases a large part of the instant property) about the possibility of beginning 'walk-in' measurements. This consultation was motivated by weather reports of approaching rain Tuesday, May 29th and for the balance of the week. BBA interrupted the 3 to 16 measurements and began these measurements on Monday afternoon and concluded on Tuesday.

6. Extensive rains Tuesday and Wednesday evenings made BBA abandon our process of taking readings at exactly one-kilometer intervals, since the fields around the tower site became so muddy and flooded that walking across them became impossible. At that point, measurements were made outside the 16-kilometer radius and at odd intervals inside the 16-kilometer radius. This allowed measurements to be made on the roads.

7. The additional rain on June 1 has once again rendered the fields around the transmitter site inaccessible.



Paul H. Reynolds