FEDERAL COMMUNICATIONS COMMISSION
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APR 2 6 2019

Mr. Donald H. Pugh, Sr.
Eternity Media Group
P.O. Box 6424
Laurel, MS 39441

Re: Eternity Media Group
WERM(AM), Africa Town, AL
Facility Identification Number: 32848
File Number: BP-20180723AAR

Dear Mr. Pugh:

This is in reference to the above-captioned minor change application to relocate station WERM(AM) to Africa Town, Alabama, and to diplex the station transmission onto a tower in the array of station WABF(AM).[1]

A preliminary review of the application reveals the following deficiencies:

1. The application has the wrong engineering attachments. Although Attachments 13, 17 and 18 are labeled with hyperlinks indicating they are for WERM(AM), upon opening they are instead for WKXG(AM). The correct attachments should include as a minimum the results of a daytime allocation study indicating that move of WERM(AM) to the collocation site of WABF(AM) meets the FCC's protection criteria for this class of station at the proposed power. There should also be a nighttime RSS study indicating that all relevant stations are protected for the power level proposed for WERM(AM) at night. There should also be a skywave study indicating that the proposed location of WERM(AM) protects any relevant Class A stations.
2. The FCC Form 301 has contradictory information on the antenna system. The 301 lists daytime and nighttime Theoretical RMS as 255.2 mV/m/kW at 1 km. However, your 301 indicates that the tower is 69.9 m tall and the electrical height is 90 degrees. Actually, a 69.9 m tower at WERM(AM)'s frequency is approximately 102 degrees tall, and with a standard ground system, would have an efficiency considerably greater than

[1]WERM(AM) is licensed for ND operation on 1220 kHz with 1 kW day and 0.03 kW night, serving the community of Fairhope, Alabama. BP-20180723AAR proposes to co-locate with station WABF (ID#70656) using one tower and the same power levels, changing the community of license to Africa Town, Alabama. WERM(AM) is currently operating at a reduced power of 0.25 kW daytime only from a tower in the array of station WABF(AM) under STA BESTA-20190306AAV.

255.2 mV/m/kW at 1km. Accordingly, it will be necessary for you to amend the 301 to correctly specify the tower height in electrical degrees and in meters. You should include a calculation or the results from application of the FCC's Figure 8 program to determine the radiator efficiency. You should indicate which tower in the WABFAM) array is being used as the non-directional radiator for WERM(AM).

Further action will be withheld for thirty (30) days from the date of this letter to allow time to amend the application. 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: Bryan A. Covey (by email only)