

Tepper Law Firm, LLC
4900 Auburn Avenue
Suite 100
Bethesda, MD 20814-2632

Telephone (301) 718-1818

Facsimile (301) 718-1820

Of Counsel
Christopher D. Imlay
John C. Trent *

Cary S. Tepper
tepperlaw@aol.com

* not admitted in Maryland

April 27, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.; Room TWD-204
Washington, D.C. 20554

Re: **WKBV-AM (41848)**
Richmond, IN
FCC FORM 302-AM APPLICATION FOR
DIRECT MEASUREMENT OF POWER

Dear Ms. Dortch:

On behalf of **Rodgers Broadcasting Corporation** we herewith submit in triplicate an FCC Form 302-AM Application for authority to determine power by the direct method for Radio Station WKBV-AM at Richmond, Indiana.

Please be advised that the measurements submitted herein were necessitated by the installation of the W247DN (formerly W249BG) antenna and feedline on the WKBV-AM tower structure.

No Filing Fee Required: Applications filed by AM Broadcast Stations to seek authority to determine power by the direct method are fee-exempt. See, Mass Media Services Application Fee Filing Guide, at footnote number 7.

Should any questions arise concerning this matter, please contact this office.

Sincerely,



Cary S. Tepper

Attachments
cc: WKBV Online Public Inspection File

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) Rodgers Broadcasting Corporation												
MAILING ADDRESS (Line 1) (Maximum 35 characters) 2301 W. Main Street												
MAILING ADDRESS (Line 2) (Maximum 35 characters)												
CITY Richmond	STATE OR COUNTRY (if foreign address) IN		ZIP CODE 47374									
TELEPHONE NUMBER (include area code) (765) 962-6533	CALL LETTERS WKBV	OTHER FCC IDENTIFIER (If applicable) 41848										
2. A. Is a fee submitted with this application?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No									
B. If No, indicate reason for fee exemption (see 47 C.F.R. Section												
<input type="checkbox"/> Governmental Entity <input type="checkbox"/> Noncommercial educational licensee <input checked="" type="checkbox"/> Other (Please explain): No fee payment is required for Direct Measurement of Power license applications. /**												
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									
<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 25px;"> </td><td style="width: 25px;"> </td><td style="width: 25px;"> </td></tr> </table>				<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 25px;">0</td><td style="width: 25px;">0</td><td style="width: 25px;">0</td><td style="width: 25px;">1</td></tr> </table>	0	0	0	1	<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 50px;">\$</td></tr> </table>	\$	<table border="1" style="width:100%; height: 20px;"> <tr><td> </td></tr> </table>	
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)										
FEE TYPE CODE	FEE MULTIPLE	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY									
<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 25px;"> </td><td style="width: 25px;"> </td><td style="width: 25px;"> </td></tr> </table>				<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 25px;">0</td><td style="width: 25px;">0</td><td style="width: 25px;">0</td><td style="width: 25px;">1</td></tr> </table>	0	0	0	1	<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 50px;">\$</td></tr> </table>	\$	<table border="1" style="width:100%; height: 20px;"> <tr><td> </td></tr> </table>	
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									
		<table border="1" style="width:100%; height: 20px;"> <tr><td style="width: 50px;">\$</td></tr> </table>	\$	<table border="1" style="width:100%; height: 20px;"> <tr><td> </td></tr> </table>								
\$												

****/ See, Media Bureau Application Filing Fee Guide, Page 15, Footnote 7.**

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Rodgers Broadcasting Corporation		
MAILING ADDRESS 2301 W. Main Street		
CITY Richmond	STATE IN	ZIP CODE 47374

2. This application is for:

- Commercial Noncommercial
 AM Directional AM Non-Directional

Call letters WKBV	Community of License Richmond, IN	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

If No, explain in an Exhibit.

Exhibit No.

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.
N/A

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.
N/A

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.

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 David Rodgers	Signature <i>David Rodgers</i>	
Title President	Date 4/24/00	Telephone Number (765) 962-6533

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

Rodgers Broadcasting Corporation

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

Station License

Direct Measurement of Power

1. Facilities authorized in construction permit				
Call Sign WKBV	File No. of Construction Permit (if applicable) N/A	Frequency (kHz) 1490 kHz	Hours of Operation Unlimited	Power in kilowatts Night 1.0 kW Day 1.0 kW
2. Station location				
State Indiana		City or Town Richmond		
3. Transmitter location				
State IN	County Wayne	City or Town Richmond	Street address (or other identification) 2301 West Main Street	
4. Main studio location				
State IN	County Wayne	City or Town Richmond	Street address (or other identification) 2301 West Main Street	
5. Remote control point location (specify only if authorized directional antenna)				
State N/A	County N/A	City or Town N/A	Street address (or other identification) N/A	

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 1.6 amperes			RF common point or antenna current (in amperes) without modulation for day system 1.6 amperes		
Measured antenna or common point resistance (in ohms) at operating frequency Night 380 ohms Day 380 ohms			Measured antenna or common point reactance (in ohms) at operating frequency Night +J 110 ohms Day + J 110 ohms		
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 (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 3-wire folded unipole skirt mounted on a guyed, uniform cross-section, grounded steel tower.	Overall height in meters of radiator above base insulator, or above base, if grounded. 109.7 meters	Overall height in meters above ground (without obstruction lighting) 109.7 meters	Overall height in meters above ground (include obstruction lighting) 110.6 meters	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. Exhibit No.
---	--	--	--	--

Excitation Series (Insulated) Shunt (Grounded) ASR(NDA D1/N1) = 1031399

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

North Latitude	39 °	49 '	41 "	West Longitude	84 °	55 '	57 "
----------------	------	------	------	----------------	------	------	------

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.
See Vertical Plan

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?

No changes to the AM tower have been implemented other than the addition of the W247DN.C - Richmond, IN; FM Translator antenna and transmission line as authorized under W247DN.C Construction Permit LMS-0000093570.

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

This Form 302-AM is being filed to reflect a new antenna resistance measurement taken after the recent tower modifications associated with, and as a §1.30003(a) condition of licensing for, the W247DN.C - Richmond, IN; FM Translator facility as authorized under W247DN.C Construction Permit LMS-0000093570.

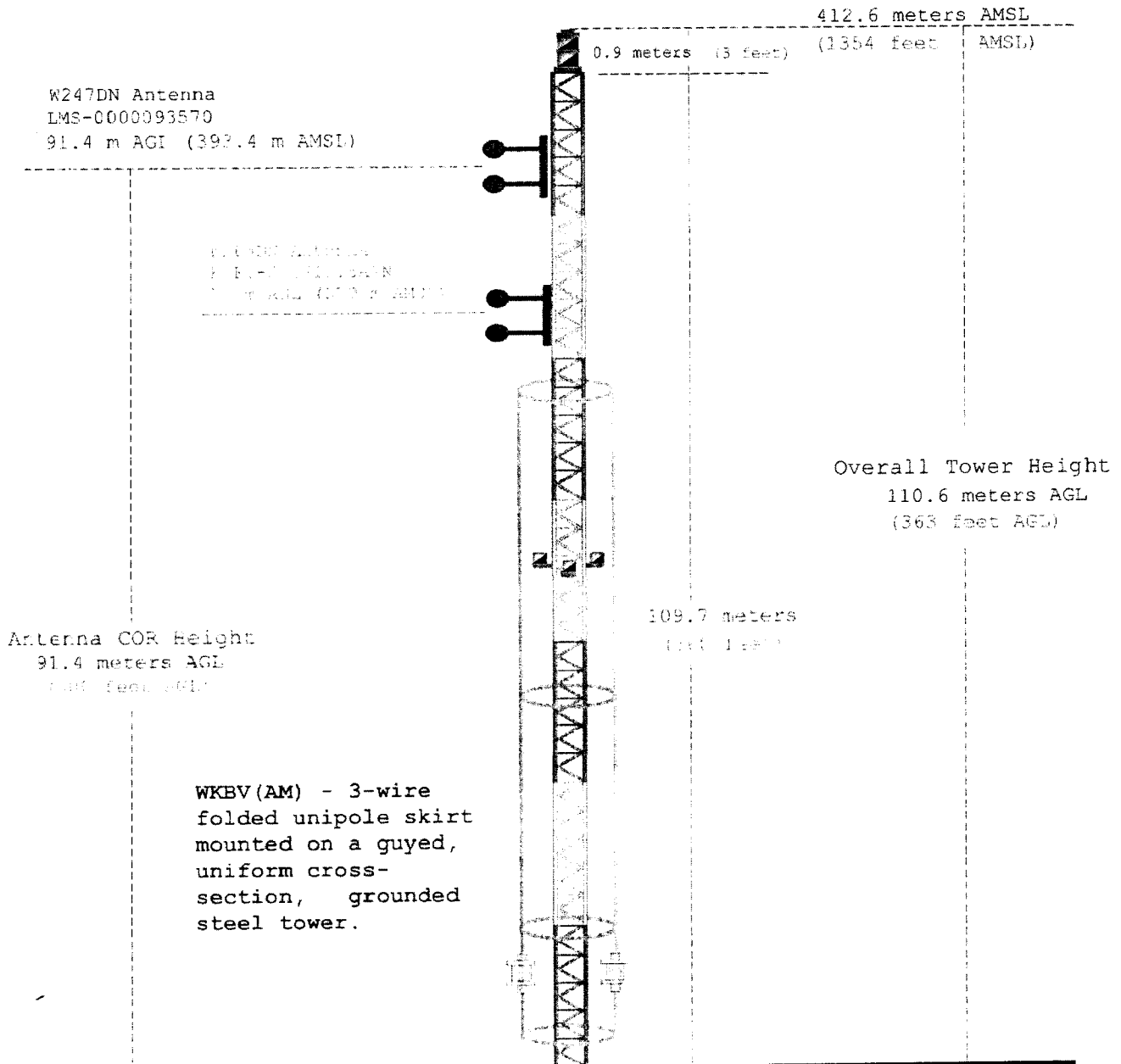
I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Justin W. Asher	Signature (check appropriate box below) <i>Justin W. Asher</i>
Address (include ZIP Code) Asher Broadcast Consulting, LLC 579 Babcock Road Bronson, MI 49028-9347	Date April 09, 2020
	Telephone No. (Include Area Code) 1(202)875-2986

- Technical Director
 Registered Professional Engineer
 Chief Operator
 Technical Consultant
 Other (specify)

Richmond, IN - WKBV(AM)

Vertical Plan of Antenna System



Ground Elevation: 412.6 meters AMSL (1354 feet AMSL)		
Address: 2301 West Main Street		
City: Richmond	Latitude (D M S) Longitude (D M S)	
County: Wayne	----- (NAD 1927)	
State: Indiana	Lat/Long 39-49-41.0 N 084-55-57.0 W (NAD 1983)	
Antenna Structure Registration 1031399	Drawing Is Not To Scale	Asher Broadcast Consulting, LLC justinasher@consultant.com 1(202)875-2986