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David M. Hunsaker

(1944-2002)

\*Not Admitted in Virginia

A Professional Corporation  
200 S. Church Street  
Woodstock, Virginia 22664

December 22, 2020

VIA E-MAIL ONLY

Tel: (540) 459-7646  
Fax: (540) 459-7656  
Website:  
[www.phtpclaw.com](http://www.phtpclaw.com)

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L. Street NE  
Washington DC 20554

Dear Madam Secretary:

Re: Radio Station WGCM (AM), Gulfport, MS, (FAC# 31216);  
License to Cover BP-20200506ABC

On behalf of JDM, Inc., the Licensee of Radio Station WGCM (AM), Gulfport, MS, (FAC# 31216), please find attached in triplicate, FCC Form 302-AM License Application to cover Construction Permit BP-20200506ABC. Please note that this Application Fee of \$725.00 shall be paid electronically upon the issuance of a License Application File Number.

Should there be any questions regarding this submission, please contact this Office at (540) 459-7646.

Very truly yours,



John C. Trent

Attachment

cc: FCC Audio Division

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.

<b>SECTION I - APPLICANT FEE INFORMATION</b>																									
1. PAYOR NAME (Last, First, Middle Initial) <b>JDM, Inc.</b>																									
MAILING ADDRESS (Line 1) (Maximum 35 characters) <b>P.O. Box 2639</b>																									
MAILING ADDRESS (Line 2) (Maximum 35 characters)																									
CITY <b>Gulfport</b>	STATE OR COUNTRY (if foreign address) <b>MS</b>		ZIP CODE <b>39505</b>																						
TELEPHONE NUMBER (include area code) <b>228-896-5500</b>	CALL LETTERS <b>WGCM</b>	OTHER FCC IDENTIFIER (if applicable) <b>31216</b>																							
2. A. Is a fee submitted with this application?			<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> 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)	(B)	(C)																							
<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="3" style="text-align: center;">FEE TYPE CODE</td></tr> <tr><td style="text-align: center;">M</td><td style="text-align: center;">M</td><td style="text-align: center;">R</td></tr> </table>	FEE TYPE CODE			M	M	R	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="4" style="text-align: center;">FEE MULTIPLE</td></tr> <tr><td style="text-align: center;">0</td><td style="text-align: center;">0</td><td style="text-align: center;">0</td><td style="text-align: center;">1</td></tr> </table>	FEE MULTIPLE				0	0	0	1	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="2" style="text-align: center;">FEE DUE FOR FEE TYPE CODE IN COLUMN (A)</td></tr> <tr><td colspan="2" style="text-align: center;">\$ <b>725.00</b></td></tr> </table>	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)		\$ <b>725.00</b>		<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="2" style="text-align: center;">FOR FCC USE ONLY</td></tr> <tr><td colspan="2" style="height: 20px;"></td></tr> </table>	FOR FCC USE ONLY			
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\$ <b>725.00</b>																									
FOR FCC USE ONLY																									
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)																							
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ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.		<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="2" style="text-align: center;">TOTAL AMOUNT REMITTED WITH THIS APPLICATION</td></tr> <tr><td colspan="2" style="text-align: center;">\$ <b>725.00</b></td></tr> </table>	TOTAL AMOUNT REMITTED WITH THIS APPLICATION		\$ <b>725.00</b>		<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td colspan="2" style="text-align: center;">FOR FCC USE ONLY</td></tr> <tr><td colspan="2" style="height: 20px;"></td></tr> </table>	FOR FCC USE ONLY																	
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SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT JDM, Inc.		
MAILING ADDRESS P.O. Box 2639		
CITY Gulfport	STATE MS	ZIP CODE 39505

2. This application is for:

- Commercial       Noncommercial  
 AM Directional       AM Non-Directional

Call letters WGCM	Community of License Gulfport, MS	Construction Permit File No. BP-20200506	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit 08/12/2023
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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.

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

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 <i>John Morgan Dowdy</i>	Signature <i>[Handwritten Signature]</i>
Title <i>President</i>	Date <i>12/22/2020</i>
Telephone Number <i>228-896-0421</i>	

**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 630 hours and 59 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 (3080-0827), 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  
**JMD, INC.**

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

- Station License                       Direct Measurement of Power

1. Facilities authorized in construction permit					
Call Sign <b>WGCM</b>	File No. of Construction Permit (if applicable) <b>BP-20200506ABC</b>	Frequency (kHz) <b>1240</b>	Hours of Operation <b>UNLIMITED</b>	Power in kilowatts	
				Night <b>0.94</b>	Day <b>0.94</b>
2. Station location					
State <b>Mississippi</b>			City or Town <b>Gulfport</b>		
3. Transmitter location					
State <b>Ms</b>	County <b>Harrison</b>	City or Town <b>Gulfport</b>		Street address (or other identification) <b>11030 Richold Rd.</b>	
4. Main studio location					
State <b>Ms</b>	County <b>Harrison</b>	City or Town <b>Gulfport</b>		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
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8. Operating constants:						
RF common point or antenna current (in amperes) without modulation for night system <b>2.28</b>			RF common point or antenna current (in amperes) without modulation for day system <b>2.28</b>			
Measured antenna or common point resistance (in ohms) at operating frequency Night <b>181</b> Day <b>181</b>			Measured antenna or common point reactance (in ohms) at operating frequency Night <b>+J 104.7</b> Day <b>+J 104.7</b>			
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 <b>G Tower</b>	Overall height in meters of radiator above base insulator, or above base, if grounded. <b>63.7</b>	Overall height in meters above ground (without obstruction lighting) <b>65.5</b>	Overall height in meters above ground (include obstruction lighting) <b>66.4</b>	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. <div style="border: 1px solid black; padding: 2px; width: fit-content; margin-left: auto;">Exhibit No. N/A</div>
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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 <b>30</b> ° <b>25</b> ' <b>45</b> "	West Longitude <b>89</b> ° <b>01</b> ' <b>08</b> "
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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.  
N/A

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

Exhibit No.  
N/A

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.

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) <b>Clarence M Beverage</b>	Signature (check appropriate box below) 
Address (include ZIP Code) <b>Communications Technologies, Inc.</b> <b>23 Binsted Drive</b> <b>Medford, NJ 08055</b>	Date <b>12/15/2020</b> <hr/> Telephone No. (Include Area Code) <b>609-451-5296</b>

- |   |   |
|---|---|
| <input type="checkbox"/> Technical Director   | <input type="checkbox"/> Registered Professional Engineer |
| <input type="checkbox"/> Chief Operator   | <input type="checkbox"/> Technical Consultant             |
| <input checked="" type="checkbox"/> Other (specify) <b>Broadcast Engineering Consultant</b> |   |

**ENGINEERING STATEMENT IN SUPPORT OF 302-AM**  
**APPLICATION FOR LICENSE**  
**WGCM(AM) 1240 kHz 0.94 kW ND-U GULFPORT, MISSISSIPPI**

**SUMMARY**

The following engineering statement has been prepared on behalf of JMD, INC. licensee of standard broadcast station WGCM(AM). The WGCM facilities described herein are currently authorized under FCC File Number BP-20200506ABC. This document includes the information required to demonstrate that the antenna system is constructed and operating in compliance with applicable FCC technical rules and the conditions specified on BP-20200506ABC.

WGCM(AM) is licensed as a ND-U facility on tower registration #1022171. This facility required no modifications to the existing ND operation other than removal of an elevated radial ground system and installation of a standard buried ground system consisting of 120 equally spaced #10 soft drawn copper radials with an average length of 60.35 meters except as truncated at the property boundary. The radial ground system installation has been completed.

Section III of FCC Form 302-AM, specifying the parameters necessary to license WGCM(AM) is part of the 302-AM application filed with this engineering statement.

**KKBE(AM) OPERATING PARAMETERS**

Measured Base Impedance:	181 + J 104.7
Unlimited time Base Current for 0.94 kW:	2.28 Amps
Weston Model 308	

**TEST EQUIPMENT & IMPEDANCE MEASUREMENTS**

Impedance measurements were taken with a Power Aim 120 serial number 1239 calibrated with manufacturer supplied calibration kit. Impedance was measured at the appropriate J Plug located immediately adjacent to the RF ammeter.

**WGCM(AM) CONSTRUCTION PERMIT CONDITIONS**

FCC Permit BP-20200506ABC conditions are described below:

1. WGCM has installed a type accepted transmitter.
2. The 302-AM application has been prepared and this engineering is a part of the filing.
3. The permittee will accept interference from other Class C stations as specified on the CP.
4. The permittee will reduce power or cease operation as necessary to protect workers or the public as required by FCC OET-65.
5. The ground system is as described on the CP.
6. The antenna system is as specified on the CP.

**FIELD PERSONNEL**

Impedance measurements were undertaken by Chief Engineer David L. Melton, Jr. of Gulfport, Mississippi.

**CONCLUSION**

Based on the data submitted herein it is believed that the WGCM(AM) facility complies with applicable FCC technical requirements.

The foregoing was prepared on behalf of JMD, Inc. by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



Clarence M. Beverage  
*for* Communications Technologies, Inc.  
Medford, New Jersey

December 15, 2020