

Kathleen A. Kirby
202.719.3360
kkirby@wiley.law

wiley

Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
Tel: 202.719.7000

wiley.law

February 24, 2021

VIA e-mail submission to James Bradshaw and Nazifa Sawez

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

Re: **Salem Communications Holding Corporation – FRN 0003760352**
Station WAVA(AM), Arlington, VA (Fac. ID 54465)
Application for Direct Measurement of Power

Dear Ms. Dortch:

On behalf of Salem Communications Holding Corporation, licensee of AM station WAVA, Arlington, VA, we are submitting herewith an application on FCC Form 302-AM for direct measurement of power. There is no filing fee associated with this application.

Should there be any questions concerning this application, please contact the undersigned.

Respectfully submitted,



Kathleen A. Kirby

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)

MAILING ADDRESS (Line 1) (Maximum 35 characters)

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

STATE OR COUNTRY (if foreign address)

ZIP CODE

TELEPHONE NUMBER (include area code)

CALL LETTERS

OTHER FCC IDENTIFIER (If applicable)

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): Non-feeable application

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
	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)	
	0 0 0 1	\$	FOR FCC USE ONLY

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
\$	

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT		
MAILING ADDRESS		
CITY	STATE	ZIP CODE

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
--------------	----------------------	------------------------------	---	---

3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

Yes No

Exhibit No.

If No, explain in an Exhibit. Not applicable - Direct Measurement application

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

Yes No

Exhibit No.

If No, state exceptions in an Exhibit. Not applicable - Direct Measurement application

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

Exhibit No.

If Yes, explain in an Exhibit. Not applicable - Direct Measurement application

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

Exhibit No.

If No, explain in an Exhibit.

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

Exhibit 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.

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 Christopher J. Henderson	Signature <i>Christopher Henderson</i>	
Title Executive Vice President & Secretary	Date 2/23/2021	Telephone Number (805)987-0400

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.

CLEAR ALL PAGES

SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant
Salem Communications Holding Corporation

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

Station License Direct Measurement of Power

1. Facilities authorized in construction permit					
Call Sign WAVA	File No. of Construction Permit (if applicable) N/A	Frequency (kHz) 780	Hours of Operation Daytime	Power in kilowatts	
				Night Ch 9.8	Day 12.0
2. Station location					
State Virginia			City or Town Arlington		
3. Transmitter location					
State MD	County Montgomery		City or Town Bethesda		Street address (or other identification) 5601 River Road
4. Main studio location					
State VA	County Arlington		City or Town Arlington		Street address (or other identification) 1735 N. Lynn Street
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.

8. Operating constants:					
RF common point or antenna current (in amperes) without modulation for night system CH 13.11			RF common point or antenna current (in amperes) without modulation for day system 14.51		
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	
57	57		+j326	+j326	

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: **N/A**

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 vertical, tapered self-supporting folded unipole	Overall height in meters of radiator above base insulator, or above base, if grounded. 89.3	Overall height in meters above ground (without obstruction lighting) 91.4	Overall height in meters above ground (include obstruction lighting) 91.4	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: 0 auto;">Exhibit No. -----</div>
---	--	--	--	--

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	38 °	58 '	35 "	West Longitude	77 °	06 '	52 "
----------------	------	------	------	----------------	------	------	------

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.
On File

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

Exhibit No.
On File

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) James D. Sadler	Signature (check appropriate box below)
Address (include ZIP Code) Carl T. Jones Corporation 7901 Yarnwood Court Springfield, VA 22153	Date February 23, 2021
	Telephone No. (Include Area Code) (703) 569-7704

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



**STATEMENT OF JAMES D. SADLER
IN SUPPORT OF AN APPLICATION
FOR DIRECT MEASUREMENT OF POWER
STATION WAVA – ARLINGTON, VIRGINIA
780 kHz - 12 kW-D, 9.8 kW-CH, ND
FACILITY ID: 54465**

Applicant: Salem Communications Holding Corporation

I am a Technical Consultant, an employee in the firm of Carl T. Jones Corporation with offices located in Springfield, VA. My education and experience are a matter of record with the Federal Communications Commission.

GENERAL

Salem Communications Holding Corporation (“SCHC”), licensee of Radio Station WAVA, Arlington, Virginia, is licensed for operation on a frequency of 780 kilohertz at a power of 12,000 Watts during daytime hours and 9,800 Watts during critical hours employing a non-directional folded unipole antenna.

This office has been authorized by SCHC to prepare this engineering statement and Section III of FCC Form 302-AM in support of an Application for Direct Measurement of Power. T-Mobile has completed the modification and installation of equipment on the shared tower of WAVA. Impedance measurements performed before and after the modifications were completed showed the modifications resulted in a change of the WAVA base resistance. The WAVA antenna base impedance was measured, by the undersigned, at the output J-Plug of the WAVA impedance matching



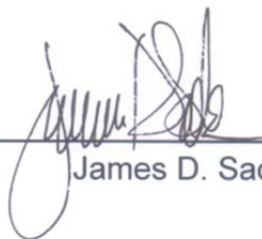
circuit. The measurements were made using a Delta Electronics, Model OIB-3, operating impedance bridge. Following the completion of the T-Mobile changes, the impedance was found to be $Z = 57 + j 326$ Ohms. The transmitter power output was set such that the unmodulated current at the output of the impedance matching network is 14.51 amperes for a daytime power output of 12,000 Watts and 13.11 amperes for a critical hours antenna input power of 9,800 Watts.

SUMMARY

It is submitted that the WAVA antenna system is in full compliance with the terms of the station's authorization. Further, it is requested that a superseding license be issued to reflect the new operating parameters submitted herein.

The engineering statement, FCC Form 302-AM, Section III, and the attached figure were prepared by me or under my direct supervision, and the information contained therein is believed to be true and correct.

DATED: February 23, 2021



James D. Sadler