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March 23, 2023

Marlene Dortch, Secretary Federal Communications Commission 45 L Street, NE Washington, D.C. 20554

RE: Minor Modification Application New Ground Broadcasting, LLC WYZE(AM), Atlanta, Georgia, Facility ID #24145

Dear Ms. Dortch:

Submitted herewith on behalf of New Ground Broadcasting, LLC, is an application for a minor modification to its AM broadcast station WYZE, Atlanta, Georgia.

As counsel for the applicant, the undersigned certifies on its behalf that neither the applicant nor any party to this application is subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The filing fee for this application will be paid upon receipt of a file number.

Please contact the undersigned should you have any questions concerning this application.

Sincerely,

/Donald Martin/

Donald E. Martin Counsel for New Ground Broadcasting, LLC

FCC 301 APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

Section I - General Information

FOR FCC USE ONLY

FOR COMMISSION USE ONLY

FILE NO.

1	Legal Name of the Applicant New Ground Broadcasting, LLC	egal Name of the Applicant ew Ground Broadcasting, LLC						
	Mailing Address							
	P.O. Box 130							
	City Morrow	City Morrow Telephone Number (include area code) 404-702-7624			ZIP Code 30260			
	Telephone Number (include area code) 404-702-7624				n			
	FCC Registration Number 0028131423	Call Sign WYZE		Facility ID Number 24145				
2.	Contact Representative (if other than applicant)		Firm or Compa	^{ny Name} Law Office of Do	nald E Martin			
	Donald Martin							
	Mailing AddressP.O. Box 8433	Mailing Addressp.O. Box 8433						
	City Falls Church	State or Country Virginia	(if foreign address)	ZIP Code 22041				
	Telephone Number (include area code) 703-642-2344	lephone Number (include area code) 3-642-2344			E-Mail Address (if available) dempc@prodigy.net			
ŀ.	Application Purpose.		Major Modi	fication of construction per	mit			
	New Station		Major Modi	fication of construction per	mit			
	Counterproposal to Amend FM Table of All	otments	Major Ame	ndment to pending application	ion			
	New Station with Petition for Rulemaking o Counterproposal to Amend FM Table of All using Tribal Priority	r coments	Minor Ame	ndment to pending applicati	ion			
	Major Change in licensed facility							
	X Minor Change in licensed facility			_				
	a. File number of original construction permit:				N/A			
	b. Service Type:	FM TV	DTV	DTS				
	c. DTV Type: Pre-Transition	Post-Tr	ansition	Both				
	d. Community of License: City Atlanta		State GA					
	e. Facility Type: 🔀 Main	Auxiliary						

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided. Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.

2. **Parties to the Application.**

- a. List the applicant, and, if other than a natural person, its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.
 - (1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.
- (2) Citizenship.
- (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc.

Yes No

- (4) Percentage of votes.
- (5) Percentage of total assets (equity plus debt).

(1)	(2)	(3)	(4)	(5)

- b. Applicant certifies that equity and financial interests not set forth above are non-attributable.
- 3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

4. Multiple Ownership.

a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?

If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.







Section II - Legal

b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules.

Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. Section 73.3555(a).

All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R Section 73.3555.

- c. Applicant certifies that the proposed facility:
 - (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;
 - (2) complies with the Commission's policies relating to future ownership interests; and
 - (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.
- d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. Section 121.201), and holds:
 - (1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or
 - (2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or
 - (3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?

All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.

- 5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application
 - a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
 - b. any pending broadcast application in which character issues have been raised.
- 6. Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.
- 7. Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.
- 8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.
- 9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.







in Exhibit No.



X Yes No	See Explanation in Exhibit No.
X Yes No	See Explanation in Exhibit No.
Yes No	See Explanation in Exhibit No.
Yes No	



10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.



Exhibit No.





		Yes	x] _{No}
ſ	Exh	ibit N	о.	

An exhibit is required unless this question is inapplicable.

- 11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.
- 12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.
- 13. Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments. If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.
- 14. **Tribal Priority Threshold Qualifications.** Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.

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. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing RAY NEAL	Typed or Printed Title of Person Signing Managing Member
Signature Leal	Date 3-21-23

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 PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name		Relationship to Applicant (e.g., Consulting Engineer)	
Signature	Date		
Mailing Address			
City State or Co		r Country (if foreign address) ZIP Code	
Telephone Number (include area code) E-Mail Ada		tress (if available)	

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 PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503). 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. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

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 PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Bert Goldman	Relationship to Applicant (e.g., Consulting Engineer) Technical Consultant			
Signature Merten & Mollon	Date 3/13/23			
Mailing Address 560 Perkins Way				
City	State or Co	ountry (if foreign address)	ZIP Code	
Auburn		95603		
Telephone Number (include area code) E-Mail A		-Mail Address (if available)		
(214) 395-5067 bert@bgo		ogoldman.net		

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 PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III - A AM Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1	Frequency: 14	80 kHz		
2	Class		XD	
2.				
3.	Hours of Operation:	Unlimited Limited	ed Daytime Share Tin	ne Specified Hours:
4.	Daytime Operation	:	[Yes No
	a. Power:	kW		
	b. Antenna Locat	tion Coordinates: (NAD 27)		
		$\frac{33}{84}$ $\frac{41}{28}$ $\frac{47}{29}$	$\begin{bmatrix} X \\ N \\ E \end{bmatrix} \begin{bmatrix} S \text{ Latitude} \\ W \text{ Longitude} \end{bmatrix}$	
	c. Nondirection	al:	[Yes No
	If "Yes," com provide the in	nplete the following items. If addition nformation requested below in an Ex Theoretical 316	nal space is needed, please khibit. mV/m per kW at 1 km	Exhibit No. 1
		Tower	1	
		Overall height above ground (include obstruction lighting) (meters)	60.4	
		Antenna structure registration	Number Notification filed with FAA X Not applicable	
		Height of radiator above base insulator, or above base, if grounded (meters)	59.4	
		Electrical height of radiator (degrees)	105.6	
		Top-Loaded/Sectionalized apparent height (degrees)		
		А		
		В		
		С		
		D		

d. Directional:	the following items. If add	litional space is needed r	Ye Nease provide Exhibi	es No t No.	
the information req	uested below in an Exhibit	it.			
The	eoretical —	mV/m at 1 km			
Sta	ndard RMS:	mV/	m at 1 km		
Towers	1	2	3	4	
Overall height above ground (include obstruction lighting) (meters)					
Antenna structure registration	Number Notification filed with FAA Not applicable				
Height of radiator above base insulator, or above base, if grounded (meters)					
Electrical height of radiator (degrees)					
Field ratio					
Phase (degrees)					
Spacing (degrees)					
Tower orientation (degrees)					
Tower reference switch					
Top-Loaded/Sectionalized apparent height (degrees)					
А					
В					
С					
D					
Augmented:			Yes	No	
If "Yes," complete the	following:				
Au	gmented RMS:	mV/	'rn at 1 krn		
	Azimuth Span	Augmentation radiation (mV/m at 1 km)			

TECH BOX - NIGHTTIME OPERATION

5.	Nig	httime Opera	tion:	Yes No
	a.	Power:	<u>0.045</u> kW	
	b.	Antenna Loc	cation Coordinates: (NAD 27)	
			$\frac{33}{204}$ $\frac{41}{20}$ $\frac{47}{20}$	$ \begin{array}{c c} & \\ & \\ & \\ & \\ & \\ \end{array} $ N $ \begin{array}{c} \\ & \\ \\ & \\ \\ & \\ \end{array} $ S Latitude $ \begin{array}{c} \\ \\ & \\ \\ & \\ \end{array} $
			084 28 29	E X W Longitude
	c.	Nondirectio	nal:	Yes No
	If ''' the	Yes," comple information 1	te the following items. If additionate the following items. If additionate the second se	al space is needed, please provide
			Theoretical 316.0	mV/m per kW at 1 km
			Tower	1
			Overall height above ground (include obstruction lighting) (meters)	60.4
			Antenna structure registration	Number Notification filed with FAA X Not applicable
			Height of radiator above base insulator, or above base, if grounded (meters)	59.4
			Electrical height of radiator (degrees)	105.6
			Top-Loaded/Sectionalized apparent height (degrees)	
			А	
			В	
			С	
			D	

TECH BOX - NIGHTTIME OPERATION

d. Directional: If "Yes," complete t	the following items. If addition	al space is needed, please pr	rovide the Exhibi	es 🚺 No t No.		
T	hooratical	mV/	mat 1 kin			
I	tandard RMS:	mV/m at 1 km				
Towers	1	2	3	4		
Overall height above ground (include obstruction lighting) (meters)						
Antenna structure registration	Number Notification filed with FAA	Number Notification filed with FAA Not applicable	Number Notification filed with FAA Not applicable	Number Notification filed with FAA Not applicable		
Height of radiator above base insulator, or above base, if grounded (meters)						
Electrical height of radiator (degrees)						
Field ratio						
Phase (degrees)						
Spacing (degrees)						
Tower orientation (degrees)						
Tower reference switch						
Top-Loaded/Sectionalized apparent height (degrees)						
А						
В						
С						
D						
Augmented: If "Yes," complete the	e following:	mV/	The second	No		
Azimuth Span Augmentation radiation						
-						

TECH BOX - CRITICAL HOURS OPERATION

6.	Crit	ical Hours Oper	ation:	Yes X No
	a.	Power:	kW	
	b.	Antenna Loca	tion Coordinates: (NAD 27)	
			• ' '	$ \begin{array}{c c} & & & \\ $
	c.	Nondirectiona	ıl:	Yes No
		If "Yes," con provide the i	nplete the following items. If addition nformation requested below in an Ex	Exhibit No.
			Theoretical	mV/m per kW at 1 km
			Tower	
			Overall height above ground (include obstruction lighting) (meters)	
			Antenna structure registration	Number Notification filed with FAA Not applicable
			Height of radiator above base insulator, or above base, if grounded (meters)	
			Electrical height of radiator (degrees)	
			Top-Loaded/Sectionalized apparent height (meters)	
			A	
			В	
			С	
			D	
				,

TECH BOX - CRITICAL HOURS OPERATION

d. Directional: if "Yes," complete the information red	the following items. If add quested below in an Exhibi	ditional space is needed, j t.	please provide	es 🚺 No t No.					
Th	eoretical	mV/m at 1 km							
Sta	andard RMS:	IS: mV/m at 1 km							
Towers	1	2	3	4					
Overall height above ground (include obstruction lighting) (meters)									
Antenna structure registration	Number Notification filed with FAA Not applicable	Number Notification filed with FAA Not applicable	Number Notification filed with FAA Not applicable	Number Notification filed with FAA Not applicable					
Height of radiator above base insulator, or above base, if grounded (meters)									
Electrical height of radiator (degrees)									
Field ratio									
Phase (degrees)									
Spacing (degrees)									
Tower orientation (degrees)									
Tower reference switch									
Top-Loaded/Sectionalized apparent height (degrees)									
А									
В									
С									
D			<u> </u>						
If "Veg " complete the	following		Yes	No					
Ai	igmented RMS:	mV/	m at 1 km						
	Azimuth Span Augmentation radiation								

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

- Broadcast Facility. The proposed facility complies with the engineering standards and assignment requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73,152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650. Exhibit Required.
- 8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).
- 9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.
- 10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.



11. Environmental Protection Act. The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).

An exhibit is required unless this question is not applicable.

13. Dispositive Section 307(b) Preference

- a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?
- b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.
- c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.











EXHIBIT RE MULTIPLE OWNERSHIP

The applicant has no attributable interest in any other broadcast station, and is therefore in compliance with the Commission's multiple ownership rules.

ENGINEERING EXHIBIT IN SUPPORT OF AN APPLICATION FOR CONSTRUCTION PERMIT TO RELOCATE WYZE – ATLANTA, GEORGIA Requesting 7kW ND-D, 1480kHz – Class D FACILITY ID: 24145

Applicant: NEW GROUND BROADCASTING, LLC

March 2023

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GENERAL

Goldman Engineering has been authorized by New Ground Broadcasting, LLC. ("NGB"), licensee of Standard Broadcast Station, WYZE, Atlanta, GA, Facility number 24145 to prepare this Engineering Statement, FCC Form 301 (Section III), and the attached figures in support of an application for a Construction Permit to relocate the WYZE antenna system 10.3 kilometers West, Southwest of the existing site, diplex with WMDG (1260kHz) and reduce power to reduce or eliminate existing contour overlap to other stations. WYZE is licensed to operate on 1480kHz. This relocation moves from the south side of Atlanta to the southwest side and is considered a minor application.

PROPOSED TRANSMITTER LOCATION

The proposed transmitter location will be collocated with existing AM station, WMDG, 1260kHz. Appropriate filters will be installed for both WMDG and WYZE to allow this operation.

ANTENNA SYSTEM

WYZE will use the same existing tower as WMDG, which is 198ft AGL 60.35m (198ft) AGL uniform cross-section tower. The tower itself is mounted 3ft AGL atop an insulator, with the radiating antenna 59.43m (195ft) long. The antenna is 105.6 degrees at 1480kHz. WYZE will operate non-directionally from the proposed tower. A drawing of the proposed tower is shown in Exhibit B.

The proposed WYZE Daytime Distance to contour table is shown as Exhibit D.

	PROPOSED DAY/ NIGHT THEORETICAL PARAMETERS								
TOWER	FIELD	PHASE	HEIGHT	SPACING	ORIENTATION				
1	1	0	105.6	0	0				

• <u>Theoretical RMS for proposed daytime ND operation, 316.0 mV/m@1km</u>

GROUND SYSTEM

WYZE will use the same ground system as the existing WMDG. As stated in their latest license, the ground system will consist of 120 equally spaced radials of #10 Soft-drawn copper wires, extending 59.5 meters (195ft) from the tower base (105.6 degrees at 1480kHz).

BLANKETING INTERFERENCE AND STATION INTERACTION

The 1,000mV/m blanketing contour extends approximately 0.57km from the tower base Based upon the 2020 census, there are 1,043 persons within the blanketing contour. The proposed 25mV/m contour encompasses 118,114 persons. Since the population within the 1,000mV/m contour is under 1% of that in the 25mV/m contour, WYZE will be compliant with 73.24(g). A map showing the blanketing contour is shown as Exhibit F.

In response to all complaints of blanketing interference, the applicant will undertake steps to mitigate the interference in accordance with the requirements of section 73.88 of the Commission's Rules and Regulations.

Other than WMDG, there are no other constructed AM facilities within 3km of the proposed site.

COVERAGE CONTOURS

The present and proposed daytime class D service contours are shown on Exhibit F and G. Neither the currently licensed nor the proposed 5mV/m daytime contour cover the entire city of Atlanta, Georgia. Both the licensed and proposed WYZE facilities are located inside the city of Atlanta.

COMMUNITY COVERAGE (WAIVER REQUEST)

As noted above, the proposed WYZE 5mV/m contour will not cover the entire Atlanta, GA community of license. As shown in Figure G, the proposed daytime 5mV/m coverage of WYZE within Atlanta will cover 332,485 people and 239.5sq. km. This compares to 489,685 people and 343.3.1sq km of the city of Atlanta.

Although the proposed WYZE only covers part of the licensed community, the transmitter will be inside the city limits of Atlanta. WYZE was displaced from its licensed tower site over two years ago and has been operating on an STA at very low power. There are few locations that WYZE could relocate to. Because of the preceding, NGB respectfully requests a waiver of 73.24(i) for WYZE for the following reasons:

- 1. Although the overall coverage is similar, WYZE is limited to 7kW so as not to increase interference to other facilities.
- 2. The station was forced to relocate, and the proposed facility is the best NGB was able to acquire for colocation at this time.
- Although not covering all of Atlanta, the proposed transmitter site for WYZE is inside the Atlanta city limit.
- 4. WYZE will cover 67.9% of the population of Atlanta, GA within the 5mV/m contour (332,485).

DAY ALLOCATION

Below is the licensed and proposed daytime contour allocation table for WYZE. The WYZE licensed facility operates at 10kW non-directionally on 1480kHz using a 102.9-degree tower which reflects an efficiency of 313.8mV/m @ 1km. The proposed operation, 10km southwest of the currently licensed location will operate with 7kW Non-directionally and will be

slightly more efficient than that currently licensed. The proposed is a 105.6-degree tower with a theoretical RMS of 316mV/m@1km. As shown in Exhibits E and E1, existing incoming M3 overlap is eliminated from WKUN and outgoing is reduced toward WKUN, and WJTW, and is eliminated to WYYZ. There is a slight 1.75 sq km additional overlap created to WRGA, but as shown in the Exhibit, there is no population in that overlap area.

LICENSED WYZE DAY STUDY

AM Daytime Study

Ref Cal Lat Lng	erence s 1: WYZE : 33-43- : 084-22	Station: -25 N 2-08 W	F P T	Freq: 1480 kHz ATLA Power: 10.0 kW Theo RMS: 313.82 mV/m @ 1km					SA, US			
#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Swtch	TL Swtch	A (deg)	B (deg)	C (deg)	D (deg)	
1	1.000	0.0	0.0	0.0	102.9	0	0	0.0	0.0	0.0	0.0	
	Call	Freq	Ci	ty	ST	Dist	A	zi	In		Out	
WK	UN	1490	MONRO	E	GA	62.7	8	1.4	-191	.75	-456.7	5
WJ	I W	1480	BRIDGE	PORT	AL	182.9	31	7.3	28	3.58	-125.0	0
WY	YΖ	1490	JASPER		GA	83.6	35	5.7	5	0.32	-11.0	0
		1470			GA	96.9	31	1.2	17	2.24	-0.7	5
	FI	1480	FRANKI			186.5	20	4.2 03	20	.40 194	0.1 Q 2	4
		1470			GA	99.8	7	3.2	16	377	15.4	7
WD	PC	1500	DALLAS		GA	48.8	30	0.0	20	03	20.0	3
wx	EM	1460	BUFORD)	GA	57.1	3	9.6	34	.87	34.8	7
WR	LA	1490	WEST P	OINT	GA	121.5	21	8.9	41	.98	35.7	8
WK	EU	1450	GRIFFIN		GA	54.8	16	8.3	46	3.31	46.3	1
WF	ZX	1490	ANNIST	ON	AL	135.5	26	7.9	56	6.62	50.1	5
WC	HM	1490	CLARKE	SVILLE	GA	124.5	3	8.3	55	5.22	50.6	4
WB	HF	1450	CARTER	SVILLE	GA	65.1	32	1.8	54	.39	54.3	9
WJ	C	1490	CHATTA	NOOGA	TN	169.2	33	0.3	76	6.72	74.2	1
WJI	E	1480	SMITHVI		TN	278.0	33	1.0	129	0.35	79.3	2
ws		1490	SANDER		GA	167.3	12	0.3	85	0.10 0.27	82.2	3
	-C TV	1480	JEFFER			2/0.1	1	1.2	152	2.37	102.0	2
	SM	1460				155.1	20	0.0 1 0	137	7.15	137 /	0
W/R	CR	1470				229.1	50	8.2	151	23	144.6	8
WP	CI	1490	GREEN	/II.I.F	SC	228.0	5	5.2 5.4	154	153	151.0	8
WG	FY	1480	CHARLC	TTE	NC	364.5	6	2.6	184	.79	168.3	7
WIT	A	1490	KNOXVII	LE	TN	251.9		8.5	175	5.77	168.7	6
WC	SV	1490	CROSS	/ILLE	TN	254.4	34	5.9	176	6.67	170.1	1
WIE	Z	1490	DECATU	IR	AL	259.7	29	0.9	177	.82	171.1	0
WH	BB	1490	SELMA		AL	285.2	23	9.2	187	7.70	185.8	3
WT	LO	1480	SOMERS	SET	KY	373.4	35	5.8	234	.41	191.0	6
WJ.	M	1490	LEWISB	JRG	TN	292.8	31	0.2	202	2.49	198.7	6
WC	LA	1470	CLAXTO	N	GA	288.1	12	7.5	200).40	199.0	7

PROPOSED WYZE DAY STUDY

AM Daytime Study

Ref Cal Lat Lng	erence S 1: WYZE : 33-41- : 084-28	tation: 47 N -29 W	Freq: 14 Power: 7 Theo RMS	Freq: 1480 kHz ATLANTA, GA, US Power: 7.0 kW Theo RMS: 315.97 mV/m @ 1km						
#	Field Ratio	Phase (deg)	Spacing Orient (deg) (deg)	Height (deg)	Ref Swtch	TL A Swtch (deg)	B C (deg) (deg)	D (deg)		
1	1.000	0.0	0.0 0.0	105.6	; O	0 0.0	0.0 0.0	0.0		
	Call	Freq	City	ST	Dist	Azi	In	Out		
WK	UN TW GA	1490 1480 1470	MONROE BRIDGEPORT ROME	GA AL GA	72.9 178.8 92.0	80.2 320.3 316 7	2.73 28.30 0.72	-22.50 -3.00 -2.50		
WY	YZ MA	1490 1480	JASPER IRONDALE	GA AL	86.5 204.0	2.3 264.8	11.50 10.96	6.16 7.54		
WD	PC FJ	1500 1480 1470	DALLAS FRANKLIN	GA NC GA	42.5 194.2	310.3 32.4 73.3	15.74 24.71 27.61	15.74 19.26 27.36		
WR	LA EM	1490 1460	WEST POINT BUFORD	GA GA	113.1 65.9	216.0 44.5	36.91 42.02	31.86 42.02		
WF2 WKI	ZX EU	1490 1450	ANNISTON GRIFFIN	AL GA	125.7 54.8	269.2 157.5	50.11 45.48	44.80 45.48		
WCI WCI	HF HM DC	1450 1490 1490	CLARKESVILLE CLARKESVILLE CHATTANOOGA	GA GA TN	62.2 133.0 167.3	330.7 40.8 333.7	62.30 78.31	52.08 58.73 76.95		
WJL WSI	.E NT	1480 1490	SMITHVILLE SANDERSVILLE	TN GA	276.2 174.6	333.1 117.8	130.83 93.08	87.51 92.62		
WH'	TY FC RM	1460 1480	PHENIX CITY/C JEFFERSON CIT		147.0 282.0	197.5 19.0	114.20 160.24 122.15	114.20 116.47 122.15		
WB		1470 1490	ALCOA	TN SC	233.6 237.7	10.5 56.2	159.08 164.20	153.69 161.76		
WIE WC	Z SV	1490 1490	DECATUR CROSSVILLE	AL TN	251.9 255.2	292.4 348.2	173.36 180.82	167.79 175.41		
WIT	A BB CR	1490 1490	KNOXVILLE SELMA		256.5 275.1 219.2	10.6 238.7 255.1	183.66 181.01 190.50	177.80 180.30 190.50		
WG	FY IM	1480 1490	CHARLOTTE		219.2 374.5 287.6	63.0 311.9	194.72 200.64	191.01 198.06		

NIGHTTIME ALLOCATION

This application for WYZE is for a Class D station. As such, there are no community of license coverage requirements and WYZE must protect other stations. The following exhibit demonstrates that the modified WYZE nighttime facility will be able to operate with 45 watts and will not increase the night limits to any other pertinent stations:

Radiation Limits Report

Radiation limits above 1000.0 mV/m@1km are not shown.

	Ct	St	City	Azimuth (Deg)	Min Theta (Deg)	Max Theta (Deg)	Limit (mV/m @ 1km)
U: WDJO	US	ОН	CINCINNATI	359.9	11.8	19.9	78.9
4: WSDS	US	MI	SALEM TOWNSHIP	4.2	6.4	11.9	482.3
WHBC	US	ОН	CANTON	18.1	8.0	14.3	97.7
WCNS	US	PA	LATROBE	30.2	7.6	13.6	113.0
WZRC	US	NY	NEW YORK	46.2	4.0	8.4	189.1
WDAS	US	PA	PHILADELPHIA	46.9	5.2	10.0	152.5
WPWC	US	VA	DUMFRIES-TRIANG	47.7	7.8	14.0	128.1
WSAR 53.	US	MA	FALL RIVER	48.7	2.3	5.9	265.3
WTOX	US	VA	GLEN ALLEN	52.6	8.9	15.6	98.9
WWBG 61:	US	NC	GREENSBORO	55.4	15.0	24.5	533.2
WGFY	US	NC	CHARLOTTE	60.8	20.2	31.7	60.9* Tightest Limit
154: CMHR-D	CU		FLORIDA	154.0	4.0	4.0	932.5
227: WABF	US	AL	MOBILE	226.6	15.8	25.7	98.3
249: KLVL	US	ТX	PASADENA	249.1	4.9	9.7	290.4
268: KNGO	US	ΤX	DALLAS	267.6	4.6	9.3	277.8
283: WNAU	US	MS	NEW ALBANY	283.3	17.7	28.2	955.0
295: KQAM	US	KS	WICHITA	294.9	3.8	8.1	218.5
306: KCZZ	US	KS	MISSION	306.1	5.0	9.9	311.2
310: KLMS	US	NE	LINCOLN	309.9	3.2	7.2	236.8
317: WRGA	US	GA	ROME	317.2	57.2	68.7	328.7
324: WVOL	US	TN	BERRY HILL	323.6	21.6	33.6	665.3
329: KAUS	US	MN	AUSTIN	328.8	3.2	7.2	240.9
331: WMBD	US	IL	PEORIA	331.1	7.2	13.1	922.1

339:					
WPFR	US IN TERRE HAUTE	338.9	10.1	17.4	82.5
WLMV	US WI MADISON	339.0	4.8	9.5	240.7
352:					
WRSW	US IN WARSAW	352.2	7.8	13.9	221.2
355:					
WSLI	US MI KENTWOOD	354.7	5.7	10.9	669.4

Current and Proposed RSS Report (Tightest limit, WGFY)

Protected Station: WGFY, 1480 kHz - CHARLOTTE, NC, US Coordinates: 35-17-05 N, 080-52-34 W Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Proposed:

	Freq	Limit			Freq	Limit	
Call	(kHz)	(mV/m)	(%)	Call	(kHz)	(mV/m)	(%)
WHBC	1480	3.450 1	.00.0	WHBC	1480	3.450 1	L00.0
WDJO	1480	3.263	94.5	WDJO	1480	3.263	94.5
	50%				50%		
WMDD	1480	2.242	47.2	WMDD	1480	2.242	47.2
*WYZE	1480	2.072	39.4	*WYZE-PRO	1480	2.055	39.1
WCNS	1480	1.911	33.8	WCNS	1480	1.911	33.8
WPFR	1480	1.790	30.0	WPFR	1480	1.790	30.0
	25%				25%		
WWBG	1470	1.484	23.8	WWBG	1470	1.484	23.8
WLOE	1490	1.411	22.0	WLOE	1490	1.411	22.0
WZRC	1480	1.381	21.0	WZRC	1480	1.381	21.0
WAEY	1490	1.305	19.4	WAEY	1490	1.305	19.4
WTOX	1480	1.256	18.4	WTOX	1480	1.256	18.4
WTQS	1490	1.225	17.6	WTQS	1490	1.225	17.6
KLVL	1480	1.215	17.2	KLVL	1480	1.215	17.2
KQAM	1480	1.213	16.9	KQAM	1480	1.213	16.9
HJTZ-A	1480	1.189	16.3	HJTZ-A	1480	1.189	16.4
WABF	1480	1.182	16.0	WABF	1480	1.182	16.1
WOPI	1490	1.164	15.6	WOPI	1490	1.164	15.6
WFXY	1490	1.141	15.1	WFXY	1490	1.141	15.1
WKUN	1490	1.139	14.9	WKUN	1490	1.139	14.9
WCHM	1490	1.128	14.6	WCHM	1490	1.128	14.6
KNGO	1480	1.110	14.2	KNGO	1480	1.110	14.2
WSVM	1490	1.097	13.9	WSVM	1490	1.097	13.9
WSNT	1490	1.096	13.8	WSNT	1490	1.096	13.8

COMPLIANCE WITH RF RADIATION REGULATIONS

The proposed WYZE operation was evaluated in terms of both electric and magnetic field components, which will be present at the base of the tower. Conservatively Using Table 2 of

Supplement A to OET Bulletin 65 (Edition 97-01), the worst-case interpolated distance at which the electric and magnetic fields would fall below ANSI guidelines is 2 meters. Accordingly, the areas surrounding the base of the tower will be appropriately restricted with a fence having a minimum radius of at least 2 meters from the nearest point of the conducting elements of the tower. The fence will assure that persons on the property outside the fenced area will not be exposed to radiofrequency field levels in excess of those recommended by ANSI. In addition, warning signs will be posted. The proposal appears to be otherwise categorically excluded from environmental processing.

CERTIFICATION

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direct supervision, and that they are true and correct to the best of his knowledge and belief.

Merten of Stollow

Bertram S. Goldman Goldman Engineering Management

Figure A WYZE TOWAIR Calculation

TOWAIR Determination Results

A routine check of the coordinates, heights, and structure type you provided indicates that this structure does not require registration.

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 6181.64 MTRS (6.18160 KM) AWAY

Туре	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	33-38-58.00N	084-26-20.00W	HARTSFIELD - JACKSON ATLANTA INTL	FULTON ATLANTA, GA	297.9	3776.5

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 6470.90 MTRS (6.47090 KM) AWAY

Туре	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	33-38-48.00N	084-26-18.00W	HARTSFIELD - JACKSON ATLANTA INTL	FULTON ATLANTA, GA	297.9	3776.5

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 7280.75 MTRS (7.28080 KM) AWAY

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Туре	C/R	Latitude	Longitude	Name	Address	Elevation (m)	Runway Length (m)
AIRP	R	33-38-5.00N	084-26-53.00W	HARTSFIELD - JACKSON ATLANTA INTL	FULTON ATLANTA, GA	297.9	3776.5

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 7571.84 MTRS (7.57179 KM) AWAY

Туре	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	33-37-55.00N	084-26-53.00W	HARTSFIELD - JACKSON ATLANTA INTL	FULTON ATLANTA, GA	297.9	3776.5

Туре	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
HELI	В	33-42-45.00N	084-25-50.00W	FORT MCPHERSON	FULTON FORT MCPHERSON, GA	320.6	121.900000000000000
Your	Spec	ifications					
NAD	33 Co	ordinates					
Latitu	de				33-	41-47.4 nor	th
Longi	tude				084	-28-28.7 we	est
Meas	urem	ents (Meters)	1				
Overa	all Stru	ucture Height (A	AGL)		60.	4	
Suppo	ort Sti	ructure Height (AGL)		0.9		
Site E	levati	on (AMSL)			267		
Struc	ture	Туре					
LTOW	ER - L	attice Tower					

PASS SLOPE(25:1): NO FAA REQ-HELIPORT 4332.73 MTRS (4.3327 KM) AWAY



Figure B Tower location and Radial layout (From 2017 WMDG Application)

Figure C Tower Drawing



Figure D Multiple Daytime DTC Report

ATLANTA

Call: WYZE

Coordinates: N 33 41 47 W 84 28 29

Frequency: 1480 kHz Number of contours: 4

	Radiation	Distances to Contours in Kilometers :				
Azimuth	one km)	5.000	.500	.250	.025	
	835 97	13 65	40 02	55 10	 1/7 87	
5.0	835 97	13 65	40.02	55 10	145 26	
10 0	835 97	13 65	40.02	55 10	145.20	
15 0	835 97	13.65	40.02	55 10	145.20	
20 0	835 97	13.65	40.02	55 10	145.20	
25.0	835 97	13 65	40.02	55 10	145 26	
30 0	835 97	13 65	40.02	53 51	141 02	
35 0	835 97	13 65	38 60	51 39	137 67	
40 0	835 97	13 65	37 46	50 25	136.83	
45 0	835 97	13 65	36 76	49 55	136 47	
50.0	835.97	13.65	36.28	49.07	136.36	
55.0	835.97	13.65	35.93	48.72	136.33	
60.0	835.97	13.56	35.68	48.47	142.73	
65.0	835.97	13.36	35.47	48.26	147.80	
70.0	835.97	13.21	35.32	48.11	150.08	
75.0	835.97	13.08	35.19	47.98	150.26	
80.0	835.97	12.98	35.10	47.89	150.28	
85.0	835.97	12.93	35.04	47.83	150.15	
90.0	835.97	12.89	35.00	47.79	150.31	
95.0	835.97	12.87	34.98	47.77	150.68	
100.0	835.97	12.86	34.97	47.76	150.95	
105.0	835.97	12.87	34.98	47.77	151.74	
110.0	835.97	12.89	35.00	47.79	152.32	
115.0	835.97	12.92	35.03	47.82	152.72	
120.0	835.97	12.97	35.08	47.87	152.95	
125.0	835.97	13.03	35.14	47.93	153.01	
130.0	835.97	13.12	35.23	48.02	152.92	
135.0	835.97	13.22	35.33	48.12	152.33	
140.0	835.97	13.36	35.47	48.26	151.30	
145.0	835.97	13.53	35.64	48.43	150.30	
150.0	835.97	13.65	35.86	48.65	150.53	
155.0	835.97	13.65	36.15	48.94	151.68	
160.0	835.97	13.65	36.53	49.32	153.63	
165.0	835.97	13.65	37.00	49.79	155.58	
170.0	835.97	13.65	37.61	50.40	157.47	
175.0	835.97	13.65	38.53	51.90	159.59	
180.0	835.97	13.65	40.02	54.68	162.37	

185.0	835.97	13.65	40.02	55.10	162.47
190.0	835.97	13.65	40.02	55.10	155.71
195.0	835.97	13.65	40.02	55.10	153.32
200.0	835.97	13.65	40.02	55.10	153.00
205.0	835.97	13.65	40.02	55.10	151.98
210.0	835.97	13.65	40.02	55.10	150.48
215.0	835.97	13.65	40.02	55.10	148.78
220.0	835.97	13.65	40.02	55.10	147.36
225.0	835.97	13.65	40.02	55.10	145.99
230.0	835.97	13.65	40.02	55.10	145.26
235.0	835.97	13.65	40.02	55.10	145.26
240.0	835.97	13.65	40.02	55.10	145.26
245.0	835.97	13.65	40.02	55.10	145.26
250.0	835.97	13.65	40.02	55.10	145.26
255.0	835.97	13.65	40.02	55.10	145.26
260.0	835.97	13.65	40.02	55.10	145.26
265.0	835.97	13.65	40.02	55.10	146.03
270.0	835.97	13.65	40.02	55.10	147.62
275.0	835.97	13.65	40.02	55.10	148.93
280.0	835.97	13.65	40.02	55.10	150.09
285.0	835.97	13.65	40.02	55.10	151.11
290.0	835.97	13.65	40.02	55.10	151.75
295.0	835.97	13.65	40.02	55.10	151.88
300.0	835.97	13.65	40.02	55.10	152.14
305.0	835.97	13.65	40.02	55.10	152.24
310.0	835.97	13.65	40.02	55.10	152.47
315.0	835.97	13.65	40.02	55.10	152.97
320.0	835.97	13.65	40.02	55.10	153.70
325.0	835.97	13.65	40.02	55.10	154.71
330.0	835.97	13.65	40.02	55.10	155.74
335.0	835.97	13.65	40.02	55.10	155.87
340.0	835.97	13.65	40.02	55.10	155.50
345.0	835.97	13.65	40.02	55.10	154.94
350.0	835.97	13.65	40.02	55.10	153.84
355.0	835.97	13.65	40.02	55.10	151.67





M3 Based overlap Area Proposed WYZE (1480) to WRGA (1470)



Figure E1- Closeup of overlap to WRGA (1470)

Page **19** of **20**

Figure F- Blanketing Contour



WYZE Proposed Blanketing Vs 25mV/m Contours

On March 30, 2021, New Ground Broadcasting, LLC Licensee of WYZE, 1480 KHZ, Atlanta, Georgia, filed an application with the Federal Communications Commission for renewal of its broadcast license.

Members of the public wishing to view this application or obtain information about how to file comments and petitions on the application can visit <u>https://publicfiles.fcc.gov/am-profile/wyze/applications-andrelated-materials/#renewals</u>