FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET SW
WASHINGTON DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
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PROCESSING ENGINEER: Edward Lubetzky
TELEPHONE: (202) 418-2700
FACSIMILE: (202) 418-1410/11
MAIL STOP: 1800B3-EAL
INTERNET ADDRESS: Edward.Lubetzky@fcc.gov

MAY 15 2008

Harry C. Martin, Esq.
Fletcher, Heald & Hildreth, P.L.C.
11th Floor, 1300 North 17th Street
Arlington, Virginia 22209

Re: Bott Communications, Inc.
WCRT(AM), Donelson, Tennessee
Facility Identification Number: 25031
File Number: BZ-20070308AGF

Dear Mr. Martin:

This is in reference to the above-captioned application for direct measurement of power, filed on behalf of Bott Communications, Inc. ("BCI").

In the application, BCI requests to increase the WCRT(AM) daytime antenna input power from 22 kW to 48 kW based on measurements taken in August of 2006. BCI contends that the measurements demonstrate that the antenna system underperforms because the antenna is located on a former industrial waste site where the composition of the soil has changed, and it needs to compensate for the reduced antenna efficiency with an increase of the antenna input power. [1]

The staff analysis of the measurement data finds that the antenna efficiency is 1882 mV/m/km for 22 kW as the soil conductivity varied from 1.5 mmho's to 5 mmho's. Our analyzed antenna efficiency was not significantly different from the theoretical efficiency of 1995.6 mV/m/km for 22 kW, derived from the chart in Figure 8 of Section 73.190. In general, we rely on the theoretical efficiency of the antenna based on Figure 8 of Section 73.190 in determining the soil conductivities, and not the reverse as it was attempted here. Thus, it seems inconsistent to claim that the disturbances and contamination of the soil surrounding the antenna system would reduce the antenna efficiency. Moreover, it is unlikely that the WCRT(AM) 210.6° antenna tower would generate an efficiency equivalent to that of an antenna tower of 60° or less. If the antenna efficiency is suffering from failure of its top-loading, or a deficient ground system, it should be repaired. We cannot compensate for the loss with an increase of the antenna input power. Accordingly, we reject BCI's analysis and deny the request to increase the antenna

[1] The WCRT(AM) authorized antenna efficiency is 1995.58 mV/m/km for 22 kW. The August 2006 measurements show the efficiency of the WCRT(AM) antenna is 1343 mV/m/km for 22 kW, based on the site ground conductivity of 4 mmoh.

input power.

Based on the foregoing, the BCI application File Number: BZ-20070308AGF, is hereby DISMISSED. This action is taken pursuant to Section 0.283 of the Commission's rules. If BCI wants to increase the WCRT(AM) daytime power, it must file a minor change application (FCC Form 301) with the Commission. The 301 application must show that the proposal meets all the Commission's allocation requirements.

Sincerely,

Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau

cc: Bott Communications, Inc.
Jeremy D. Ruck