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A STUDY OF THE PROBLEMS  
INVOLVED IN FINDING A LOCATION  
AND ACQUIRING A LICENSE TO  
BUILD AN AMPLITUDE MODULATION  
RADIO STATION

Thesis for the Degree of M. A.  
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A STUDY OF THE PROBLEMS INVOLVED IN FINDING A  
LOCATION AND ACQUIRING A LICENSE TO BUILD AN  
AMPLITUDE MODULATION RADIO STATION

By

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## CHAPTER I

### INTRODUCTION

#### PURPOSE OF THE THESIS

The purpose of this study has been to describe the steps preliminary to acquiring a construction permit to build a standard AM broadcast station. These steps are six in number:

1. Tentative choice of site
2. Study of Federal Communications Commission requirements
3. Interviews with station owners and managers
4. Verification of tentative choice of site
5. Survey of community to determine needs and resources
6. Compilation of data needed in filling out the non-technical sections of Federal Communications Commission Form 301.

#### JUSTIFICATION OF PROJECT

Having long desired to construct a standard broadcast station, the writer decided to investigate at first hand the problems and methods involved in choosing a particular town and its surrounding area as a site.



This thesis describes a workable procedure for such an investigation. The proposed methods here are probably not suitable for all types of locations without adaptation.

### DEFINITIONS

Since the field of this study is radio some explanation of the Federal Communications Commission is in order. The FCC is the federal agency that regulates interstate and foreign communications by means of electrical energy, including radio and wire services. It also licenses non-government radio stations and radio operators.

The FCC is not under any department, but is an independent federal establishment created by Congress and acting under authority of the Communications Act of 1934, as amended from the Federal Radio Communications Act of 1927;<sup>1</sup> it therefore reports directly to Congress.

History of radio surveillance shows that jurisdiction over electrical communications was formerly shared by the Commerce Department, the Post Office Department, the Interstate Commerce Commission, and, later, by the Federal Radio Commission. The rapid development of radio necessitated consolidation of all supervisory and regulatory functions in a single agency. The Communications Act, signed June 19,

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<sup>1</sup>An ABC of the FCC, (Washington 25, D.C.: Government Printing Office), p. 1

1934, created the FCC for this purpose. The Communications Act applies to all persons engaged in the United States in communication by radio and to the licensing and regulating of all radio stations.<sup>2</sup>

The major activities of the FCC are the allocating of frequencies for all licensed radio stations; licensing and regulating radio services and radio operators; regulating common carriers engaged in interstate and foreign communications by wire or radio; promoting safety through the use of radio on land, water, and in the air; encouraging more effective and widespread use of radio; and, as in the Second World War, utilizing its regulatory powers over wire and radio communications to aid military effort. The FCC does not charge for licensing or performing any other regulatory functions.

The FCC functions as a unit, with direct supervision of all activities. Besides sitting at hearings and at formal and informal meetings, it assigns various commissioners to carry out particular projects. Some of its work is delegated to qualified department heads, but policy making as a whole is retained for the entire Commission.

The FCC's administrative work is handled by four departments: Accounting, Engineering, Law, and Secretarial, supplemented by a Budget and Planning Division, a Personnel

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<sup>2</sup> Ibid., p. 1



Division, and a Rules Division. The Accounting Department is concerned with accounting, financial, economic and rate aspects of licensing and regulating, both international and domestic, and is responsible for continuing accounting and tariff supervision, economic research, and compilation of analysis of statistics. The Engineering Department handles the technical phases of the various services and supervises the engineering field staff and technical research activities. The Law Department's work covers the legal phases of licensing and regulating, plus administration (including legislation and rule making), and litigation before the courts. The Secretarial Department has charge of internal administration and the issuance of orders and decisions adopted by the Commission.

The FCC at this time employs about fourteen hundred, of which five hundred are in the field. These persons are all under Civil Service with the few exceptions provided for in the Communications Act.

There are many field offices under the FCC. Including territories and possessions, there are twenty-three radio district offices, six sub-offices, four ship offices, various monitory stations and a field engineering laboratory. Field duties include monitoring and inspecting all classes of radio stations, examining radio operators, making various radio measurements and field intensity recordings, and con-

ducting related investigations. It is through the field stations that the FCC polices the ether. Transmissions are monitored to see that they are in accordance with treaties, law, and regulation. There are ten monitoring stations and twelve secondary monitoring stations. If necessary, mobile equipment can trace illegal operation or sources of interference. Monitoring stations also furnish emergency directions to government and civilian aircraft. In addition to the above, there are four field offices concerned with accounting, three with law, and three with common carrier engineering.<sup>3</sup>

The question may be asked as to how the FCC enforces its orders and regulations. This is accomplished by administrative sanctions, such as action on licenses, and by court action, through any United States district court.

The term "common carrier" is applied to any person or company furnishing wire or radio communication to the public for hire, excluding broadcasters.<sup>4</sup> The FCC regulation of common carriers embraces the licensing of radiotelephone and radiotelegraph circuits and assigning frequencies for operation by radio. It also supervises charges, practices, classifications and regulations in connection with interstate and foreign communication, but

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<sup>3</sup> Ibid., p. 4

<sup>4</sup> Ibid., p. 4



does not regulate charges for program time; authorizes construction of new channels and discontinuance or reduction of service; prevents rate and service discriminations; requires carriers to establish through routes when necessary; acts on applications for interlocking directorates and merger of domestic common carriers; acts on complaints directed against communication carriers; and prescribes and reviews the accounting performed by communication carriers. Charges and regulations of such carriers are filed with the Commission and are open to public inspection. About 27,500 pages of such tariff filing were received by the Commission in 1946.<sup>5</sup>

The FCC regulation of radio includes the consideration of applications for construction permits and licenses for broadcast and other classes of radio stations; assignment of frequencies, power and call letters; authorization of communication circuits; modification or revocation of licenses; inspection of equipment and regulation of its use; provision against interference; reviewing service; licensing of radio operators; regulation of radio common carriers, and otherwise carrying out of the provisions of the Communications Act.<sup>6</sup>

Since only a limited number of radio transmissions

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<sup>5</sup>Ibid., p. 4

<sup>6</sup>Ibid., p. 5

can be on the air at the same time without causing interference, the Communications Act requires all non-government radio operation to be licensed. Courts have held that radio transmission anywhere within the United States or its possessions necessitates licensing both the transmitter and its operator.

"Spectrum" is that part of the electromagnetic radiation field which can be used for radio transmission.<sup>7</sup> Before World War II, the useful radio spectrum extended from ten kilocycles to three hundred megacycles.<sup>8</sup> Today the radio ceiling has been raised to thirty thousand megacycles, which makes room for new services.

"Frequency" is the particular portion of the spectrum in which a transmission is assigned. The radio spectrum might be compared to a vertical ruler with its functional divisions representing positions occupied by transmissions of the different radio services. Just as autos must keep within a particular lane of the highway, so must radio transmissions obey traffic controls to keep from "colliding" or causing intolerable interference with one another in the ether lanes.<sup>9</sup>

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<sup>7</sup> Radio, a Public Primer, (Washington 25, D.C.: Government Printing Office, 1947), p. 3

<sup>8</sup> A megacycle is one thousand kilocycles.

<sup>9</sup> An ABC of the FCC, p.6

"Amplitude modulation' is the oldest system of program transmission and is used in the standard broadcast band. That part of the radio spectrum extending from 550 to 1,600 kilocycles is used in standard broadcast."<sup>10</sup>

"Standard (~~AM~~) broadcast stations use power of from one hundred watts to fifty kilowatts (fifty thousand watts)."<sup>11</sup>

"There are four classes of ~~AM~~ stations. A Class I station, which operates on a clear channel, employs ten thousand, twenty-five thousand, or fifty thousand watts power to serve remote rural areas as well as a large center of population. A Class II station, also on a clear channel, uses two hundred fifty, five hundred, one thousand, five thousand, twenty-five thousand, or fifty thousand watts to give secondary service beyond the primary service area. A Class III station, which shares a regional channel with several similar stations, uses power of five hundred, one thousand, or five thousand watts and serves a center of population and adjacent rural areas. A Class IV station operates on a local channel, which is shared by many similar stations elsewhere, and employs one hundred to two hundred fifty watts for purely local service."<sup>12</sup>

"Primary service area' means the area in which the signal is not subjected to objectionable interference and fading. 'Secondary service area' means an area served without objectionable interference but subject to occasional variations in strength of signal. 'Intermittent service area' means an area receiving service beyond the primary service area and subject to some interference and fading."<sup>13</sup>

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<sup>10</sup> Radio, a Public Primer, p.7

<sup>11</sup> Ibid., p. 7

<sup>12</sup> Ibid., p. 7

<sup>13</sup> Ibid., p. 8

A person interested in building a station will wonder about how radio call letters are assigned. International agreement provides for the national identification of a station by the first letter or first two letters of its assigned call signal, and for this purpose apportions the alphabet among the many nations. For all United States stations, except mobile stations of the Army, the Commission is authorized by the Communications Act to assign call signals. The Commission now uses the initial letters A, K, N, and W. Except for blocks of call signals assigned to particular government agencies or departments for their own use, call signals are assigned by the Commission upon an individual station basis. The initial letter N is generally reserved at the present time for the Coast Guard and Navy, while the letters A, K, and W are shared by other stations, both government and non-government. Broadcast stations are assigned call letters beginning with K or W. As a rule, call letters beginning with K are assigned to broadcast stations west of the Mississippi River and in the territories and possessions, while W is assigned to broadcast stations east of the Mississippi.

One of the first and most important questions that confronts a prospective station owner would be the basis on which broadcast stations are granted licenses. The main concern of the FCC is that radio in the community serve the



"public interest, convenience, or necessity." Because radio channels are limited and are a part of the public domain, it is important that they be entrusted to licensees who have a high sense of public responsibility.

To insure such responsibility, the FCC has set up certain basic requirements. In general, applicants must be legally, technically and financially qualified, and show that operation of the proposed station will be in the public interest.

"The privilege of a license is extended by the Communications Act only to citizens of the United States. It is denied to corporations wherein any officer or director is an alien or of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by any <sup>14</sup> corporation or government or representative thereof."

If a person meets the above qualifications he must then familiarize himself with the broadcast application procedure. It is essentially the same for all types of broadcast stations. A standard broadcast applicant must select a frequency. Unless the person applying for a construction permit is acquainted with the technical aspects of this problem, he should enlist the services of a consulting engineer. Names of competent engineers can be secured from the FCC, Washington 25, D.C. In this instance,

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<sup>14</sup> An ABC of the FCC, p. 9

it would of necessity be done. Many other technical problems<sup>1</sup> would be handled by the engineer, such as choosing a site for the antenna, choice of type of antenna, type and size of studios, and choice of equipment. The approach to the problem will be one of a managerial nature.

Application must then be made in triplicate on forms furnished by the Commission.

"These forms require information as to the citizenship and character of the applicant, as well as his financial, technical and other qualifications to construct and operate a station, plus details about his proposed service. Applications are processed in turn under different categories determined by their nature. If there is no interference or other problems which require a hearing, and if the Commission determines that a grant will serve the public interest, a construction permit is issued forthwith. Construction must be completed within eight months. Extension may be granted for good cause shown.<sup>15</sup> Then application is made for a regular license."<sup>15</sup>

One rightfully inquires about FCC censorship of radio. On this subject the Communications Act states,

"Nothing in this Act shall be understood or construed to give the Commission the power of censorship over the radio communications signals transmitted by any radio station, and no regulation or condition shall be promulgated or fixed by the Commission which shall interfere with the right of free speech by means of radio communications."<sup>16</sup>

The Commission has held that freedom of speech on the radio requires that equal opportunity be given for the presentation of all sides of public issues. The Commission

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<sup>15</sup> Ibid., p. 9

<sup>16</sup> Ibid., p. 10

goes on further to say,

"If any licensee shall permit any person who is a legally qualified candidate for public office to use a broadcast station, he shall afford equal opportunities to all other such candidates for that office in the use of such radio facilities...provided, that such licensee shall have no power of censorship over the material broadcast under the provision of this section. No obligation is hereby imposed upon any licensee to allow the use of its station to any such candidate."<sup>17</sup>

The Communications Act specifically mentions the barring of lotteries and obscene, indecent, or profane language. Transmission of false distress signals is also prohibited.

The FCC does not license networks as such, but rather licenses stations individually, putting responsibility for their operation directly upon the person, corporation, or other group obtaining the license.

With this information about the FCC, its responsibilities and powers, and general ideas as to its rules and regulations, the author then proceeded to seek a solution to the problem involved.

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<sup>17</sup> Ibid., p. 10

## CHAPTER II

### PROCEDURE

#### INITIAL CHOICE OF SITE

As has been stated before, the entire research culminates in the actual submission of the construction permit form to the FCC. But there is still the problem of survival. A location must be chosen that will insure the greatest measure of success possible.

The author, a native of Michigan, was familiar with the location and coverage of stations in the Lower Peninsula. There seemed little need for a station in this area. In September, 1947, a trip was made through the Upper Peninsula. Many towns were visited and all seemed to have adequate radio coverage with the exception of St. Ignace, Michigan.

St. Ignace, Michigan, is located at the Straits of Mackinac and is the entrance to the Upper Peninsula. The Straits are the boundary line between Lake Michigan and Lake Huron. St. Ignace is three hundred fifty-four miles northwest of Detroit, Michigan and four hundred eighty-eight miles northeast of Chicago, Illinois.

Approval or disapproval of this site was to be determined at a future date. The problems in selecting a site and the methods used to solve these problems will be

enlarged upon later.

## STUDY OF THE GENERAL RULES AND REGULATIONS OF THE FCC

After choosing a tentative site, the author then wrote to the FCC for its rules and regulations and requested a construction permit blank. These rules and regulations are published in several volumes of both general and highly technical information as to the standards set up by the Commission. Because of their nature, it is not expected that any one individual should understand all phases of these rules and regulations. The FCC, in sending this material, suggests that a consulting engineer be employed to assist in answering the technical questions found in the application form.

Construction permits are granted only upon written, subscribed, and verified application upon forms prescribed<sup>1</sup> by the Commission. The requirement is three copies of Form<sup>2</sup> 301.

Each application must be specific with regard to frequency or frequencies, power, hours of operation, equipment, location of the station, and other information required by

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<sup>1</sup> "Federal Communications Commission Rules and Regulations," Part I (Washington, D.C.: United States Government Printing Office, 1947), p. 25

<sup>2</sup> Ibid., p. 26



the application form. An application for broadcast facilities in the standard band is limited to one frequency.

Each application must include complete information in regard to the name of the party or parties interested, their legal, technical, financial, and other qualifications. The Commission may require the applicant to submit these facts under oath if they deem it necessary.

A Commission definition was utilized by the author in choosing a local station. A local station is one which

"serves to present programs of local interest to the residents of that community; to utilize and develop local entertainment talent which is available; to serve local, religious, educational, civic, patriotic and other organizations; to broadcast local news; and to generally provide a means of local expression and a local broadcast service to listeners in that area."<sup>3</sup>

To further clarify for the applicant the Commission's viewpoint we find,

"It is the manifest duty of the licensing authority, in passing upon applications for licenses or renewal thereof, to determine whether or not the applicant is rendering or can render adequate public service. Such service necessarily includes broadcasting of a considerable proportion of programs devoted to education, labor, agriculture, and similar activities concerned with human betterment. In actual practice over a period of seven years, as the records of the Federal Radio Commission amply prove, this has been the principal test which the Commission has applied in dealing with broadcast applications."<sup>4</sup>

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<sup>3</sup>Public Service Responsibility of Broadcast Licensees. Report by FCC, (Washington 25, D.C.: United States Government Printing Office, March 7, 1946), p. 9

<sup>4</sup>Ibid., p. 10

The following statement by the FCC on the subject of public service, although written in 1928, is still applicable today:

"Broadcasting stations are licensed to serve the public and not for the purpose of furthering the private or selfish interests of individuals or groups of individuals. The standard of public interest, convenience, or necessity means nothing if it does not mean this....The emphasis should be on receiving of service and the standard of public interest, convenience, or necessity should be construed accordingly....The entire listening public within the service area of a station, or of a group of stations in one community, is entitled to service from that station or stations....In a sense a broadcasting station may be regarded as a sort of mouthpiece on the air for the community it serves, over which its public events of general interest, its political campaigns, its election results, its athletic contests, its orchestras and artists, and discussion of its public issues may be broadcast. If ....the station performs its duty in furnishing a well rounded program, the rights of the community have been achieved."<sup>5</sup>

The Commission continually stresses that an adequate amount of time during the good listening hours be made available to meet the needs of the community in terms of public expression and of local interest. This means broadcasting public service programs at hours when the public is awake and listening.

The rules and regulations of the FCC, although many and varied, all converge in its original requirement as stated in the Communications Act of 1934, which is to build the station in the "public interest, convenience, or necessity." It is entirely up to the individual interested

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<sup>5</sup> Ibid., p. 12

to choose a location and with the help of an engineer decide the technical aspects involved. This information is then used in answering the questions in the application form. If the Commission, after careful scrutiny, determines that the requirements mentioned above are fulfilled, that the chosen frequency is not in interference with others, that the applicant has adequate equipment and financial ability to make good use of the assigned channel, the construction permit will be granted.

#### INTERVIEWS WITH STATION OWNERS AND MANAGERS

Before deciding on the actual location and the type of station to apply for, it was thought that personal interviews with station managers and owners would be of great value. By becoming acquainted with the problems they had, one is better prepared to meet his own. An attempt was made to interview either the station owner or manager. If neither was available, an interview was sought with a member who had been present when the construction permit was filed with the FCC or when the station first opened its studios. Five persons were interviewed, each interview lasting approximately two hours. A list of these persons will be found in Appendix A.

The following problems were discussed:

1. What is the best method of choosing a location for a standard broadcast station?

- a. What size of station should be built at the tentative site?
  - b. What would be the approximate cost of the station?
2. How may the town best be surveyed?
- a. What questions should be asked in the door-to-door survey?
  - b. How may one best approach business and professional persons to stimulate interest and cooperation?
  - c. How may one investigate the possibilities of cooperation in public service programs by various civic and religious organizations?
3. What is the best proportion of public service programs to commercial programs?
4. What further problems were encountered in securing their own construction permits?

#### SELECTION OF SITE

There are many sources of information one may investigate and consider before the final choice of a suitable location for a radio station is chosen.

A map, showing the cities with standard broadcast stations of the United States and Canada, was obtained from

the publishers of Broadcasting.<sup>6</sup> From this map a person can get a fair idea of the cities that are not adequately reached by radio signal. Also, the most recent Marketbook,<sup>7</sup> which lists stations by states, call letters and frequencies, was obtained. Pamphlets, books, and reports of surveys were secured from the FCC. Material furnished by the National Association of Broadcasters was also utilized. A complete list of these will be found in the Bibliography.

Interviews with station managers and owners were held and advice sought pertaining to the selection of a site.

After a proposed site was chosen the following things were to be considered in a survey: population of the town, its industries, amount of radio coverage already present in the town, quantity and quality of public service that could be rendered to the community, proof for the FCC that there was "interest, convenience or necessity" for a station in that town.

#### SURVEY OF COMMUNITY

After careful selection of a location a thorough survey of the community was conducted to determine if the town could meet the FCC requirement of "interest, convenience and necessity."

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<sup>6</sup>Broadcasting Publications, Inc., (Washington 4, D.C., January 1, 1948)

<sup>7</sup>1948 Marketbook (Sol Taishoff, editor and publisher, Broadcasting Publications Inc., Washington 4, D.C., October 11, 1948)



It must be kept in mind that even though a radio station may meet the "interest, convenience or necessity" of a community it still may be a poor economic risk. Consequently the prospective applicant needs the fullest possible financial information to evaluate his chances of establishing a profitable station.

"The new stations will encounter least financial difficulty in areas where there has been little competition for the local advertisers' money. Moreover, the new local station will enter the field with certain competitive advantages of cost and coverage. The steady decline in the number of small town newspapers during the past twenty years has in many areas removed the new station's keenest competition."<sup>8</sup>

Over all, a new station in St. Ignace would be in a rather favorable competitive position. Its economic prospects are dependent on two major factors: (1) the extent to which the station is able to attract and hold new listeners in its area, thus enhancing its attractiveness to both local and national advertisers, and, (2) on the maintenance or increase of economic activity and consumer purchasing power in the St. Ignace area.<sup>9</sup>

It is hoped that one phase of the survey will show

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<sup>8</sup> An Economic Study of Standard Broadcasting, FCC,  
(Washington 25, D.C.: Government Printing Office, October 31, 1947), pp. 92-93

<sup>9</sup> Ibid., p. 93

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little fractionating of the radio audience. If this can be shown the potential listening audience will be much greater in St. Ignace than if a larger city were chosen as a site.

"The presence or absence of another radio station in the community in which the new stations have gone has affected the profitability of each class of station.....All of the local part time stations in new radio communities became profitable earlier than did those in old radio communities..... A sharp difference existed in new local part time stations which in communities of less than fifty thousand had income of one thousand ninety-six dollars per month while those in the larger communities were losing nine hundred ninety-one dollars per month.....In short, the opportunities for profitable operation have been more numerous in the smaller than in the larger communities."<sup>11</sup>

"It follows that the development of a demand for local radio advertising in 'new' radio communities will be easier in markets where: (1) local media have not been competitive, and have not completely developed or satisfied the advertising needs of present or potential local advertisers, (2) non-local media (e.g., the nearest metropolitan daily newspaper, or broadcast station) have been unable to render effective advertising service to the present or potential local advertisers."<sup>12</sup>

Before actually surveying St. Ignace, a suitable method had to be planned. A door-to-door questionnaire was developed with the aid of Doctor John F. MacNaughton,

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<sup>10</sup>Since VJ Day there has been a great increase in radio stations; this tends to divide the potential listening audience into smaller segments.

<sup>11</sup>An Economic Study of Standard Broadcasting, FCC,  
pp. 45-46

<sup>12</sup>Ibid., pp. 74-75

Assistant Professor of Psychology, Michigan State College, and the radio station managers and owners interviewed. The questionnaire is short and to the point, leaving little possibility for ambiguous answers. A copy of the questionnaire will be found in Appendix B.

"Do you have a radio?" This was asked so as to determine the approximate number of radio homes in the area.

"If the reception were better would you have a radio?" From experience the author was aware that reception was poor in and around St. Ignace. From the combined results of questions one and two it would be possible to approximate the prospective radio audience.

"What stations do you get clearly?" This was asked in order to prove to the FCC and to the investor that there was a need for a station in St. Ignace. This also was asked to test the author's assumption that reception of existing stations is poor.

"Do you think there is need for a station here in St. Ignace?" This question sought public opinion, for without the public support of a station it could not possibly survive.

"If the above answer is 'yes', why?" This question gave the person interviewed opportunity to support the answer given to the preceding question. This would give further proof of the necessity for a station.

"What type of program do you like best?" The answers given would determine the potential audience's likes and dislikes. Here again one could determine wherein the interests of the community lay. The compilation of the answers to this question would be used as an aid in filling out Section IV of Form 301, namely, "The Statement of Program Service of Broadcast Applicant."

The second part of the total survey consisted of personal interviews of all business and professional men. The one direct question was "If a radio station were built in St. Ignace, would you be interested in advertising?" From the results of these interviews the author could better predict the future economic success of the station.

Before conducting the door-to-door survey, an interview was held with Mayor A.G. Phillips. The entire project was explained in detail and permission was secured to survey that city. This was done so as to establish good will between the author and the mayor.

A map of the city was studied to determine the best possible method of sampling the town in the door-to-door survey. The population was found to be approximately three thousand. Again utilizing the suggestion of Doctor MacNaughton, 25 per cent of the population was surveyed. This meant that approximately every other house had to be visited. Seven hundred thirty-five homes were called upon with a response of seven hundred. There was no response from

thirty of the homes and at five of them the occupants declined to answer.

After completing this phase of the town's survey, the next approach was to interview business and professional men. Every business establishment was contacted. The author explained in each instance the object of the survey and then, after answering any questions they had concerning the survey, he asked if they would be interested in advertising on the radio if facilities were provided, written answers being requested. They were also asked to include any suggestions that might be helpful to the owner in making the station a real asset to the community. The suggestions offered here would influence the type of programs to be scheduled. It was made clear that this did not constitute a contract, so as to alleviate any fear that they were legally committing themselves and also to get a clearer idea of their thoughts.

This written material could be used as an exhibit for the FCC in securing the permit to construct. All this stands as evidence that St. Ignace actually has the need for a station.

The next phase of the survey dealt with interviewing representatives of civic groups. It is around these civic groups that public service programs are built, so that special effort was made to get a good insight into the amount

of cooperation expected. It is also the type and amount of public service programs offered to the community that most interests the FCC when they consider the application.

The groups that were contacted were the city librarian, priests and preachers of all denominations, the Superintendent of Schools, the Mayor (who was also head of the Lions Club), a representative of the Civic League, American Legion, Masons, Highway Department, Conservation Department, Coast Guard, Department of Agriculture Forest Service, Veterans' Employment Representative, State Ferries Department, Unemployment Commission, Health Department and the Department of Social Welfare.

The best location for any radio studio would be in the center of the community so as to be easily accessible to both visitors and clients. It is here that the question of real estate costs arises. "Would it be better to rent and establish the studios in a hotel or secure land and build new studios?" Several possible locations for the studio were considered with the aid of real estate agents and costs were discussed.

Having completed the survey of St. Ignace, the author then proceeded to visit the outlying towns. The nearest community is Mackinac Island, which is accessible only by water from either St. Ignace or Mackinaw City in the Lower Peninsula. Mackinac Island lies approximately



midway between the two cities, and is a twenty minute boat ride from St. Ignace. It is famous the world over as a tourist mecca, and, as such, loses a great part of its population when the tourist season ends. A survey was conducted on the island of the business and professional people, asking questions and inviting suggestions as was done in St. Ignace. A lengthy interview was held with the Public Relations man of Grand Hotel to inquire into both aspects of public service programs and their interest in advertising.

Mackinaw City was then surveyed as to its potentialities of public service material and to see if the merchants were interested in advertising. This city is a fifty minute ferry trip from St. Ignace and is located in the Lower Peninsula. It, too, is a tourist attraction and maintains a population of only about fifteen hundred in the off season period.

The outcome of these various surveys will be discussed in a later chapter.

## CHAPTER III

### RESULTS

#### RESULTS OF INTERVIEWS WITH STATION OWNERS AND MANAGERS

As was mentioned previously, the personal interviews were held with men who had already gone through this pre-construction period, to obtain first-hand information on how they proceeded to choose locations for their stations.

Various avenues of investigation were suggested: Broadcasting Publication's map of the United States showing the location of all standard radio stations; Broadcasting Marketbook; various books, pamphlets, survey results, and Form 301 secured from the FCC; material solicited from the National Association of Broadcasters; and maps of Michigan to study population.

Two of the men interviewed suggested doing the above research before even attempting to decide on an initial choice of site, while others agreed that an initial site should first be chosen and the research on that particular town then completed. One owner cited his own method--that of doing the two together. That is, conducting a general survey of the possibilities of an area, followed by a study of any information at hand pertaining to the area chosen.

They suggested that at any time, or immediately following the completion of it, a Washington attorney

should be hired, who in turn hires for the builder an FCC-approved consulting engineer to search the spectrum for a possible frequency. It is the attorney's responsibility to keep the builder informed of any other application submitted requesting the same frequency.

The consulting engineer assists the local engineer, who is also employed at this time, on the decisions concerning antenna site and its construction, range of radio coverage of chosen type of station, approximate cost of the station, and other technical problems that may arise in this period.

The Washington attorney and the consulting and local engineers then collaborate in filling out the technical sections of Form 301 from their research and decisions.<sup>1</sup>

After a location is chosen, the class of the station should be decided. The author expressed his desire to build in a small community with a population of approximately five thousand. Those interviewed agreed that a two hundred and fifty watt Class Four station would serve both the community and surrounding area adequately.

All but one person interviewed agreed that a plan of survey of the community would then logically follow, in the

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<sup>1</sup> Advice of Phillip Malloy, Program Director, WHRB, Benton Harbor, Michigan

light of the FCC rulings, in that material could be gathered and later presented as exhibits to be submitted with the application form. The one person disagreed with this plan on the basis that if adequate research was done in choosing a site, a survey would not be necessary.

It was next suggested that considerable time be spent in planning the questions to be asked and choosing the persons to be included in the survey. All agreed that a door-to-door survey would be relevant and suggestions were offered as to questions that might be asked. The author was<sup>2</sup> advised not to refer to the survey as a thesis project.

It was suggested that the door-to-door survey be short and to the point. They thought that answers to the questions should give a true picture of the community, revealing its likes and dislikes. From such a survey the programs could evolve.

"What stations do you get clearly?" was one question directly suggested by a station manager and was used in the survey. It was inferred that the answers to this question would give the interviewer an excellent indication of the amount of competition that would confront a new licensee in<sup>3</sup> that area.

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<sup>2</sup> Advice of William Cizek, Station Manager, WLBW, Jackson, Michigan

<sup>3</sup> Cizek, William

In conjunction with the door-to-door survey, it was agreed that personal interviews should be held with the business and professional people of the community and of near-by communities. "If there were a radio station in St. Ignace, would you be interested in advertising?" was the one specific question suggested by the author and agreed upon by all radio persons interviewed. "It is here that one should attempt to establish good will if ever it is to be established. These people are your future clients, your bread and butter, and now is the time to impress them that you, as a prospective station owner, are their servant."<sup>4</sup>

It was further suggested that during these interviews there be no mention of money unless the prospective client should inquire as to the cost of a commercial. "Never ask how much they spend on advertising at the present time or how much they will be willing to spend. This will all be discovered after the station is on the air and radio time is offered for sale. It will then be the job of the salesman to uncover these pertinent facts."<sup>5</sup>

The next approach suggested by station personnel was interviews with civic leaders. The main basis of an FCC

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<sup>4</sup> Advice of John Pomeroy, Assistant Station Manager, WILS, Lansing, Michigan

<sup>5</sup> Cizek, William

grant of a construction permit is a good ratio of public service to commercial programs. Since it is from the civic groups that public service programs emanate it is very essential in the survey to discover the amount of public service that can be offered to the community. Mr. Cizek suggested that thirty to thirty-five per cent public service programs was an excellent ratio to maintain.

It was suggested that after completing the survey of the town, it would be of great value to duplicate that survey in near-by communities, with the omission of the door-to-door survey. The information obtained from additional door-to-door surveys would undoubtedly reveal nothing not already discovered.<sup>6</sup>

Finally, the authorities were asked to suggest other problems that they had encountered as prospective licensees. It was revealed that the antenna site selected by the engineer must be sanctioned by the Civil Aeronautics Authority. In one instance, the period of construction was lengthened considerably because an airline objected to the antenna site. The matter was taken to court and finally a compromise was agreed upon.<sup>7</sup>

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<sup>6</sup> Advice of Rene' Riel, Assistant Manager, CKNQ, Sudbury, Ontario, Canada

<sup>7</sup> Advice of Richard Burnett, Manager, WSOO, Sault Ste. Marie, Michigan

Everyone interviewed warned the writer of the high mortality in new radio stations, and, with this caution in mind, he proceeded.

#### RESULTS OF SELECTION OF SITE

After careful study of all the research material used to help decide on a site, St. Ignace, Michigan, was chosen for survey. The factors that led to this decision were the size of the town, existence of little advertising competition, and poor radio reception, all of which led the author to believe that there was a need for a radio station there.

#### RESULTS OF SURVEY

As stated previously, St. Ignace has a year round population of approximately three thousand. Of this number, seven hundred were actually interviewed in the door-to-door survey; fifty business and professional persons and twenty representatives of civic organizations were interviewed.

A word might be said about the amount of interest and cooperation shown to the author while conducting the surveys. Almost all of the people interviewed responded with great interest and enthusiasm, and seemed very willing to cooperate both in answering the questions and volunteering suggestions. The town does not have good radio reception



and the people seemed elated to think that St. Ignace would possibly own a radio station.

The responses to various questions asked in the door-to-door survey will be reviewed first.

1. "Do you have a radio?"

"Yes" responses	92.6%
"No" responses	7.4%

2. "If the reception were better would you have a radio?"

"Yes" responses	86.0%
"No" responses	14.0%
"A better radio would be purchased."	33.8%
"Like to see FM <sup>8</sup> incorporated in the AM station."	21.0%

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<sup>8</sup> FM (frequency modulation) claims several advantages. Besides having high fidelity capabilities, it is ordinarily free of static, fading, and background overlapping of other stations' programs.

3. "What stations do you get clearly?"

<u>%</u>	<u>STATION</u>	<u>LOCATION</u>	<u>REMARKS</u>
25.1	WSOO	Sault Ste. Marie, Mich.	
23.1	WSOO	Sault Ste. Marie, Mich.	Daytime only
12.3	WMBN	Petoskey, Mich.	
7.6	No call letters given	Chicago, Ill.	Sometimes
6.4	No call letters given		All local
5.8	WMAM	Marinette, Wis.	
3.4	WMAM	Marinette, Wis.	Sometimes
3.0	No call letters given		Varies According To Weather
2.6	No call letters given	Grand Rapids, Mich.	

4. "Do you think there is need for a station here in St. Ignace?"

"Yes" responses	98.4%
"No" responses	1.6%



5. "If 'yes,' why?"

<u>2</u>	<u>REMARKS</u>
76.9	Get better reception
61.1	Not enough choice now
45.5	Would help promote town
16.1	Radio a good advertising media
29.9	St. Ignace a good location for a station
41.0	Would force Soo Edison Electric Company to clear up electrical disturbances
6.9	Would boost church attendance through public service programs
4.6	Public schools would benefit through the use of radio
3.6	Community organizations would benefit through radio
10.0	Town and visitors would become aware of public conveniences available to the community
1.0	Would like to see local station as a good network affiliate
1.0	Make people more community conscious, thus beautifying the town

The seven persons answering "no" to the fourth question also volunteered explanations. 85.7 per cent said a station could not survive in St. Ignace, while 42.8 per cent expressed their contention that the town didn't need one. 28.5 per cent said the station would cost the city too much money.

After completing the door-to-door surveys, business and professional persons were contacted. The number interviewed totaled fifty, of which thirty-five responded with written statements to the question "If there were a radio station in St. Ignace, would you be interested in advertising?" Of the total number, 80 per cent said they would buy time and do all in their power to support the station and 20 per cent were not interested. The latter gave as their reasons that because St. Ignace is so small, the local citizens are well acquainted with each business establishment. Radio advertising could not produce any business which the stores were not already handling, unless tourist trade could be attracted. Several excellent suggestions were given as to what was considered good program material. Samples of these letters are to be found in Appendix C.

The next phase of the survey was that of the civic groups, around which public service programs are built. Twenty civic representatives were personally interviewed.

Five ministers expressed their opinions of the great possibilities of public service programs which could be used to supplement their regular devotional programs. All were anxious to see the station develop so that the people in the community would be made more aware of the work being done in the churches.

The Superintendent of Schools was interviewed and proved very cooperative. He expressed a great desire to see a station built in St. Ignace and said it would serve a definite need of the schools. Student participation shows, student productions, the broadcasting of school news were all advocated by him. He stated that St. Ignace had a high rate of juvenile delinquency and expressed belief that participation and interest by these young people in radio programs would be of great help in combating this problem. He concluded by saying that although the state sponsors a number of excellent educational programs over WKAR in East Lansing, Michigan, St. Ignace was unable to receive them. If a station were to be established in St. Ignace an arrangement might be made to present these or similar educational programs.

The Civic League Public Librarian was next interviewed so as to further predict the possibilities of public service programs. The librarian suggested that a show could be built around recent books, titles and authors,

with short book reviews from book jackets which would be of interest to the public. Also suggested were periodic announcements of special programs and story hours that are held in the library. Of great help to the library would be a general report of the library board, the librarian, and the work done in connection with the library to create greater interest in the public and keep them informed.

All the other civic groups that were contacted were also very cooperative and promised to extend all the help necessary in the developing of public service programs.

Mackinac Island was visited next and an over all survey was conducted of the business persons there. There were sixteen interviews completed and all but one seemed to think that there was a definite need for a station and that it could survive. Fifty per cent of those people said they would advertise just to help support the station. The one person who did not think the station would have a chance of survival was the most influential of the Island, the manager of Grand hotel. His reasoning is certainly something to consider. He stated that this particular area is definitely a summer resort where business is not substantial on a year round basis, and while chances of making good in the summer were excellent, the lapse between this resort period is much too great for such an investment. As far as he was concerned there would be no point in advertising

Grand Hotel because the greatest percentage of their guests are not from that vicinity but from far and remote points.

The author's next survey was conducted at Mackinaw City. Again general contacts were made to business and civic representatives. Twenty business and professional men were interviewed and all of them stated that they would like to see a station in that vicinity so they could advertise, especially during the vacation months. Here again was a general consensus of opinion that the station might prove a poor risk and that if it survived at all it would have to be off the money made during those vacation months.

Civic representatives all pledged their support in giving their wholehearted cooperation to the station.

#### PREPARATION OF FCC APPLICATION

The information gathered from this total research has been used in completing Application Form 301, which will be found in Appendix D. Sections of the form that are not filled out are to be considered of a technical nature and the answers to these questions would be supplied by an attorney, consulting or local engineer under employ of the prospective builder.



## CHAPTER IV

### EVALUATION

#### EVALUATION OF STUDY OF FCC RULES AND REGULATIONS

A careful study of the FCC rules and regulations is a most essential step in determining the problems that face a prospective radio station builder, for without knowledge of the required standards to be met, a person would blindly grope his way about.

It would be of inestimable value to have some knowledge of the technical phases of radio, so that when technical problems arose they could be intelligently discussed and evaluated with one's consulting or local engineer.

In the actual building of a station, an attorney's services would also be needed to explain and aid in answering questions concerning FCC regulations. Even with a fairly complete background in the non-technical phases of radio, the rules and regulations are somewhat difficult to understand because of the formal language in which they are stated. Without enlisting the help of such counsel it would be practically impossible to proceed.

#### EVALUATION OF INTERVIEWS

The interviews held with members of radio stations now in operation proved to be most enlightening. Insight was

gained into the problems that confronted these men when they were attempting to secure their construction permits.

It was from this source of information that the best method of choosing a location was decided upon, the author suggesting the general plan to them for criticism, and proceeding to employ it with their approval.

The size of the station to build was also decided in part upon recommendation of these station owners and managers. Likewise, every step that was used in conducting research was discussed at length in these interviews and unless a step met their approval it was not used. As an example of this, the author, in his proposed interviews with business and professional persons, intended to inquire into the amount of money spent on advertising at the present time. This question was abandoned after completing the station interviews on the ground that it is poor business policy to discuss money in any manner while conducting a survey of this type.

The five persons who were interviewed were very kind in the giving of their time and help. It was the wish of the author to interview many more men in the radio field and this should perforce be done. Eight other station owners and managers were contacted but no answers were received. In three cases, the studio was actually visited, but the author was refused audience.

The informal type of interview proved to be the most profitable in each case. There were no set questions asked, but rather a simple statement of the problem was given. From there the questions and answers to questions seemed to unfold.

If the author were to conduct these interviews again he would first become better acquainted with Form 301 and consequently be able to ask more pertinent questions. The Form requires a statement of the applicants' policy with respect to making time available for the discussions of public issues. The form also inquires what practice is proposed with respect to the number and length of spot announcements allowed in a given period. These two topics were not discussed in any of the interviews, but would have been of great help had they been included.

These interviews constituted one of the most useful devices in the entire process of the survey.

#### EVALUATION OF SELECTION OF SITE

The many sources of information used in the selection of St. Ignace as a probable location for a radio station proved most useful.

The map provided by Broadcasting Publications, Inc. was of great help in verifying the author's first contention that St. Ignace was a town not adequately covered by radio.

The selection of St. Ignace for a site assures the potential owner of a fairly large audience because of lack of coverage. Local media have not been competitive, and have not completely developed or satisfied the advertising needs of present or potential local advertisers. It was then up to the author to prove that other media (e.g., the nearest metropolitan daily newspaper or broadcast station) had been unable to render effective advertising service to the present or potential local advertisers.

The biggest problem in the final selection of a site was to gather proof for the FCC that a station in St. Ignace would be in the "public interest, convenience or necessity." The various surveys in St. Ignace and surrounding territories were conducted to gather this material. Having compiled the data from these surveys, the author is of the opinion that St. Ignace is a logical place to construct a station. Upon submission of Form 301, the FCC would examine the application and determine if there were any engineering conflicts and if all other requirements were met. If the FCC were satisfied, the application would be granted and a construction permit issued.

#### EVALUATION OF FCC APPLICATION

In completing Section IV of Form 301, which is the "Statement of Program Service of Broadcast Applicant," the results of the door-to-door survey were utilized. A well

rounded program service, which would meet "the tastes, needs, and desires of all substantial groups among the listening public"<sup>1</sup> was designed. The program service that was formulated consists of "entertainment, consisting of both classical and lighter grades; religion; education; instruction; important public events; discussion of public questions; weather; market reports, and news and matters of interest to all members of the family."<sup>2</sup>

The final evaluation of the FCC application comes from the Commission itself. If the Commission is able to determine on the basis of the data thus available that a grant will serve the public interest, the construction permit will be granted forthwith.<sup>3</sup>

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<sup>1</sup> Public Service Responsibility of Broadcast Licensees, FCC, p. 10

<sup>2</sup> Ibid., p. 10

<sup>3</sup> Ibid., p. 59

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## APPENDIXES

## APPENDIX A

### RADIO PERSONS INTERVIEWED

Burnett, Richard, Manager, WSOO, Sault Ste. Marie, Michigan

Cizek, William, Manager, WIBM, Jackson, Michigan

Malloy, Phillip, Program Director, WEEB, Benton Harbor,  
Michigan

Pomeroy, John, Assistant Manager, WILS, Lansing, Michigan

Riel, Rene', Assistant Manager, CKNO, Sudbury, Ontario,  
Canada

## APPENDIX B

## DOOR-TO-DOOR SURVEY QUESTIONNAIRE

NAME: \_ \_ \_ \_ \_

ADDRESS: \_ \_ \_ \_ \_

1. Do you have a radio?
2. If the reception were better would you have a radio?
3. What stations do you get clearly?
4. Do you think there is need for a station here in  
St. Ignace?
5. If yes, why?
6. What type of program do you like best?

## APPENDIX C

SAMPLE LETTERS FROM BUSINESS, CIVIC,  
AND PROFESSIONAL REPRESENTATIVES

City Fish Market  
St. Ignace,  
Michigan

To Whom It May Concern:

The question was put to me as to whether I would be interested in advertising if there were a broadcasting station in St. Ignace. I sincerely believe that since St. Ignace is the gateway to the northern part of Michigan and the farther northwest including Canada, it would be a perfect spot for dishing out all kinds of information including navigation, hunting and fishing, sightseeing, excursions of all kinds, weather reports, and advertising of all kinds of products both going and coming. Since this country is coming into its own as a source of different raw materials and a market place for finished products. I would do all I could to back up any one starting a station here. I would advertise.

City Fish Market  
(signed) Chet Taylor

To Whom It May Concern:

Due to our very poor reception due to our location, a local radio station would be very desirable. We would be interested in advertising on a local station because of the large area that would be affected.

Phillips Jewelry  
(signed) A.G. Phillips

11 August 1948

I feel that a radio station in St. Ignace would be a fine thing. It would be helpful to our tourist guest in the seasons when they are here in great number and anything that helps the tourist helps St. Ignace.

It would be helpful to the Churches of St. Ignace as well and would provide a means of broadcasting daily devotional services and other services important to the Church Year.

(signed) William N. Mertz  
Methodist Minister

A radio station in St. Ignace would serve a definite need of the schools. The state sponsors a number of excellent educational programs broadcast over station WJAR. Our students cannot make use of these programs because we cannot receive this station in this area. Another service could be rendered by giving the students an opportunity to participate in radio programs-production of plays, broadcasting school news, etc.

The St. Ignace Public Schools would be glad to co-operate in any way possible with a radio station in our community.

(signed) E. J. Ossmann  
Superintendent of Schools

The Civic League Public Library will be willing in any way to work with a public radio system in St. Ignace. Recent books, titles and authors, could be given, and a short book review from a book jacket of certain books which would be interesting to the public. Also announcements of story hour or other special programs which are often held in the library, if announced over the radio, would be a grand way to circulate information to the public.

Once in a while a general report could be given of the library, library board, the librarian, and the work that they are doing.

(signed) Jane Peach  
Librarian

## APPENDIX D

## FEDERAL COMMUNICATIONS COMMISSION APPLICATION FORM 301

## FORM

EXHIBIT #1	PROGRAM LOG
EXHIBIT #2	STATEMENT OF POLICY
EXHIBIT #3	GENERAL PLANS FOR STARTING THE STATION

United States of America  
Federal Communications CommissionAPPLICATION FOR AUTHORITY TO CONSTRUCT A NEW BROADCAST  
STATION OR MAKE CHANGES IN AN EXISTING BROADCAST STATION

(Adopted 10-16-47)

## INSTRUCTIONS

A. This form is to be used in applying for authority to construct a new AM (standard), commercial FM (frequency modulation), or commercial television broadcast station, or to make changes in existing commercial broadcast stations. This form consists of this part, Section I, and the following sections:

Section II, Legal Qualifications of Broadcast Applicant

Section III, Financial Qualifications of Broadcast Applicant

Section IV, Statement of Program Service of Broadcast Applicant

Section V-A, Standard Broadcast Engineering Data

Section V-B, FM Broadcast Engineering Data

Section V-C, Television Broadcast Engineering Data

Section V-G, Antenna and Site Information

B. Prepare and file three copies of this form and all exhibits and swear to one copy. File with Federal Communications Commission, Washington 25, D. C.

C. Number exhibits serially in the space provided in the body of the form and list each exhibit in the space provided on the back of this sheet.

D. The name of the applicant stated in Section I hereof shall be the exact corporate name, if a corporation; if a partnership, the names of all partners and the name under which the partnership does business; if an unincorporated association, the name of an executive officer, his office; and the name of the association. In other Sections of the form the name need be only sufficient for identification of the applicant.

E. Information called for by this application which is already on file with the Commission need not be refiled in this application provided (1) the information is now on file in another application or FCC form filed by or on behalf of this applicant; (2) the information is identified fully by reference to the file number (if any), the FCC form number, and the filing date of the application or other form containing the information and the page or paragraph referred to, and (3) after making the reference, the applicant states: "No change since date of filing." Any such reference will be considered to incorporate into this application the application or other form referred to in its entirety. Do not incorporate by reference any material which is not to be open to the public.

F. This application must be executed by applicant, if an individual; by a partner of applicant, if a partnership; by an officer of applicant, if a corporation or association; or by attorney of applicant only under conditions shown in Section 1.303, Rules Relating to Organization and Practice and Procedure, in which event satisfactory evidence of disability of applicant or his absence from the Continental United States and authority of attorney to act must be submitted with application.

G. Before filling out this application, the applicant should familiarize himself with the Communications Act of 1934 and the following parts of the Commission's Rules and Regulations: Part I, Rules Relating to Organization and Practice and Procedure; Parts Relating to the Broadcast Services; Standards of Good Engineering Practice.

H. BE SURE ALL NECESSARY INFORMATION IS FURNISHED AND ALL PARAGRAPHS ARE FULLY ANSWERED. IF ANY PORTIONS OF THE APPLICATION ARE NOT APPLICABLE, SPECIFICALLY SO STATE. DEFECTIVE OR INCOMPLETE APPLICATIONS MAY BE RETURNED WITHOUT CONSIDERATION.

File No.

Name and post office address of applicant (See Instruction D)

Robert E. Brown  
417 E. Grand River  
East Lansing, Michigan

Send notices and communications to the following-named person at the post office address indicated

Robert E. Brown  
417 E. Grand River  
East Lansing, Michigan

## 1. Requested facilities

Frequency	Power in kilowatts		Minimum hours operation daily
	Night	Day	
		250	10

## Hours of operation

Unlimited <input type="checkbox"/>	Sharing with (Specify Stations)	Other (Specify)
Daytime only <input checked="" type="checkbox"/>		
Limited <input type="checkbox"/>		

Type of station (as Standard, FM, Television)

Standard

Location of main studio

City	State
St. Ignace	Michigan

## 2. If authority to make changes in an existing station is requested

## a. Present facilities

Frequency	Call	Power in kilowatts		Minimum hours operation daily
		Night	Day	

## Hours of operation

Unlimited <input type="checkbox"/>	Sharing with (Specify Stations)	Other (Specify)
Daytime only <input type="checkbox"/>		
Limited <input type="checkbox"/>		

Location of main studio

City	State

b. If this application is for changes in an existing authorization, complete Section I and any other sections necessary to show all substantial changes in information filed with the Commission in prior applications or reports. In the spaces below check Sections submitted herewith and as to Sections not submitted herewith refer to the prior application or report containing the requested information in accordance with Instruction E. (If contemplated expenditures are less than \$1,000, do not complete Section III)

Section No. Reference (File or Form No. and Date)

- ☐ Section II  
☐ Section III  
☐ Section IV  
☐ Section V

Have there been any substantial changes Yes ☐ No ☐  
in the information incorporated in this  
application by reference in this paragraph?

## 3. If this application is contingent on the grant of another pending application, state name of other applicant and file number of other application.

The applicant hereby waives any claim to the use of any particular frequency or of the ether as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934)

The applicant represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

All the statements made in the application and attached exhibits are considered material representations, and all the exhibits are a material part hereof and are incorporated herein as if set out in full in the application.

The applicant, or the undersigned on the applicant's behalf, states that he has endeavored to supply full and correct information as to all matters which are relevant to this application and that he has done so as to all matters within his own knowledge.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

(Name of applicant)

By \_\_\_\_\_

\_\_\_\_\_  
Title

Subscribed and sworn to

before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_  
Notary Public

SEAL

(Notary public's seal must be affixed where the law of jurisdiction requires, otherwise state that law does not require seal.)

My commission expires \_\_\_\_\_

If applicant is represented by legal or engineering counsel,  
state name and post office address:

EXHIBITS furnished as required by this form:

Exhibit No.	Section and Para. No. of Form	Name of officer or employee (1) by whom or (2) under whose direction exhibit was prepared (show which)	Official title
1	IV 6	Robert E. Brown	owner and manager
2	IV 8	Robert E. Brown	owner and manager
3	IV 13	Robert E. Brown	owner and manager



Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION	Section II
<b>LEGAL QUALIFICATIONS OF BROADCAST APPLICANT</b>	<b>Name of Applicant</b>  <div style="text-align: center; font-size: 1.2em;">Robert E. Brown</div>		
<b>INSTRUCTIONS</b>			
<p>As used in paragraphs 6 to 10 and 19 to 21, both inclusive, of Section II of this form, the words "party to this application" have the following meanings, respectively: In case of an <u>individual applicant</u>, the applicant. In case of a <u>partnership applicant</u>, all partners, including limited and silent partners. In case of a <u>corporate applicant</u>, all officers, directors, stockholders of record, persons owning the beneficial interest in any stock, subscribers to any stock, and persons who voted any of the voting stock at the last stockholders meeting. In case of <u>any other applicant</u>, all executive officers, members of the governing board, and owners or subscribers to any membership or ownership interest in the applicant. (Note: If the applicant considers that to furnish a complete answer to the paragraphs referred to would be an unreasonable burden because of the number of parties involved, it may petition the Commission for a waiver of the strict terms of this requirement).</p>			
<p>1. Applicant is (Check one): An individual <input checked="" type="checkbox"/>, a general partnership <input type="checkbox"/>, a limited partnership <input type="checkbox"/>, a corporation <input type="checkbox"/>, an unincorporated association <input type="checkbox"/>.</p>			
<p>2. If applicant is not an individual, give the State, District, Territory or Possession under the laws of which it is organized</p>			
<p>3. Submit as Exhibit No. _____ copies, one of which must be properly certified, of (a) if applicant is a general or limited partnership, the partnership agreement; (b) if applicant is a corporation, the articles of incorporation (or charter) and the bylaws, certified by the Secretary of State or other appropriate official; (c) if applicant is an unincorporated association, the articles of association or other legal instrument under which applicant is organized showing the purpose thereof, and the by-laws, if any. In each case, submit properly certified copies of all amendments.</p>			
<p>4. If applicant is a corporation or an unincorporated association, indicate specifically by reference to page and paragraph of the articles of incorporation or of association, the charter powers relied upon by the applicant to show that it is legally empowered to construct and operate the proposed station.</p>			
<p>5. Complete Tables I and II on pages 2 and 4.</p>			
<b>CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS (See instructions above)</b>			
<p>6. If applicant is an individual, is the applicant a citizen of the United States; or, if applicant is not an individual, are all parties to this application citizens of the United States? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>          If the answer is "No", state the name and citizenship of each person who is not a citizen of the United States.</p>			
<p>7. Is United States citizenship of any party to this application claimed by reason of naturalization? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>          If so, state the name of such party, the date and place of issuance of final certificate of naturalization, certificate number, and name and location of court authorizing issuance of same.</p>			
<p>8. Is United States citizenship of any party to this application claimed by reason of naturalization of a parent? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>          If so, state the name of such party, the name of the parent to whom the final certificate was issued, the age of the party to this application at the time the certificate was issued, and any additional facts relied on to establish citizenship, in addition to the information required by Paragraph 7 hereof.</p>			
<p>9a. Is applicant or any party to this application a representative of an alien or of a foreign government? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			
<p>b. If applicant is a corporation, is more than 20 percent of the capital stock owned of record or may it be voted by aliens or their representatives, or by a foreign government or a representative thereof, or by any corporation organized under the laws of a foreign country? Yes <input type="checkbox"/> No <input type="checkbox"/></p>			
<p>c. If applicant is a corporation and is controlled by another corporation or corporations, is more than 25 percent of the capital stock of such controlling corporation or corporations owned of record or may it be voted by aliens, their representatives, or by any corporation organized under the laws of a foreign country? Yes <input type="checkbox"/> No <input type="checkbox"/></p>			
<p>d. If the answer to any of the foregoing parts of this paragraph is "Yes", submit as Exhibit No. _____ a full disclosure concerning the persons and matters involved.</p>			
<p>10a. Has applicant or any party to this application had a station license revoked by order or decree of any Federal court? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			
<p>b. Has the applicant or any party to this application been found guilty by a Federal court of the violation of the laws of the United States relating to unlawful restraints and monopolies and to combinations, contracts, or agreements in restraint of trade? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			
<p>c. Has the applicant or any party to this proceeding been finally adjudged guilty by a Federal court of unlawfully monopolizing or attempting unlawfully to monopolize radio communications, directly or indirectly, through the control of the manufacture or sale of radio apparatus, through exclusive traffic arrangements, or by any other means, or to have been using unfair methods of competition? (See Section 313 of the Communications Act of 1934) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			
<p>d. Has the applicant or any party to this application been found guilty by any court of any felony or other crime involving moral turpitude, or of the violation of any State, territorial or local law relating to unlawful letteries, restraints and monopolies and combinations, contracts or agreements in restraint of trade, or of using unfair methods of competition? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			

Table 1

**INSTRUCTIONS:** If applicant is an individual, fill out columns (a) and (b) stating (a) applicant's name and residence (home) address or addresses, and (b) applicant's date and place of birth. If applicant is a partnership, fill out columns (a), (b), (c) and (d), stating as to each general or limited partner (including silent partners): (a) name and residence (home) address or addresses, (b) date and place of birth, (c) nature of partnership interest (i.e. general or limited), and (d) percent of ownership interest. If applicant is a corporation or an unincorporated association, fill out all columns, giving the information requested as to all officers, directors and members of the governing board. In addition, give the information as to all stockholders, stock subscribers, holders of membership certificates of other ownership interests, unless the applicant has more than 20 stockholders, stock subscribers or holders of membership certificates or other ownership interests, in which case furnish the information as to all persons owning 3 percent or more of the capital stock, membership or ownership interest, and all persons who voted 3 percent or more of such stock or interest at the last meeting of stockholders, members or owners. If applicant is a corporation or unincorporated association, state in column (d) the percent of voting stock or voting interest held, (e) whether or not the individual is a director or member of the governing board (Yes or No), (f) the number of shares of stock of all classes or membership interests held, and (g) the number of shares of stock of all classes or membership interests subscribed for.

(a) Name and residence (home) address(es)	(b) Date and place of birth	(c) Nature of partnership interest or office held	(d) Percent of ownership or percent of voting stock or membership	(e) Director or member of governing board (Yes or No)	No. shares of each class of stock or No. membership or ownership interests (f) Now held (g) Subscribed

10. (Continued)

e. Is there now pending in any court or administrative body against the applicant or any party to this application any action, suit, or proceeding, civil or criminal, involving the alleged commission of any felony or other crime or involving an alleged violation of any Federal, State or territorial law, administrative rule, or regulation?

Yes ☐ No ☒

f. Have voluntary proceedings in bankruptcy been instituted by, or have involuntary proceedings in bankruptcy ever been brought against applicant or any party to this application?

Yes ☐ No ☒

g. Are there outstanding any unsatisfied judgments or decrees against applicant or any party to this application?

Yes ☐ No ☒

h. If the answer to any of the foregoing parts of this paragraph is "Yes", submit as Exhibit No. a full disclosure concerning the persons and matters involved, identifying the court and the proceeding (by dates and file numbers), stating the facts upon which the proceeding was based or the nature of the offense committed, and the disposition of the matter.

## CORPORATE APPLICANT

INSTRUCTION: If applicant is a corporation, answer paragraphs 11 to 16, inclusive.

## 11. Stock of corporation

(a) Class of stock	(b) Par value	(c) Vote per share	(d) No. shares authorized	(e) No. shares issued	(f) No. shares subscribed	(g) Total number stockholders

12. At the last meeting of stockholders were any shares of stock voted by proxy?

Yes ☐ No ☐

If so, state

Class of stock	No. of shares	Meeting date	No. voted by stockholders in person	No. voted by proxy	Name of each proxy voting 1 percent or more of each class

13. In connection with the stockholders and stock subscribers named in Table I to this form, is the beneficial owner of the stock a person other than the owner of record or subscriber?

Yes ☐ No ☐

If so, submit as Exhibit No. a statement of (a) the name of the owner of record, or subscriber, (b) the name of the beneficial owner, (c) the conditions under which the owner or subscriber holds and votes or has subscribed for such stock, and (d) a copy of any contract or other instrument relating to such conditions.

14. Has applicant any other obligations or securities authorized or outstanding which bear voting rights either absolutely or upon any contingency?

Yes ☐ No ☐

If so, submit as Exhibit No. a statement of (a) the nature of such securities, (b) the face value or par value, (c) the number of units authorized, (d) the number of units issued and outstanding, (e) the number of units, if any, proposed to be issued, (f) the conditions or contingency upon which such securities may be voted, and (g) facts showing whether or not such securities have been voted or entitled to be voted in the past 5 years and at the present time.

15a. Is applicant corporation, directly or indirectly, controlled by another corporation or legal entity?

Yes ☐ No ☐

b. Is 10 percent or more of the stock of applicant corporation owned by another corporation or legal entity?

Yes ☐ No ☐

c. If the answer to any of the foregoing parts of this paragraph is "Yes", state below the name of such other corporation or legal entity, and submit as Exhibit No. (a) a statement of how such control, if any, exists and the extent thereof, and (b) with respect to such other corporation or legal entity, a statement answering paragraphs 11 to 15, inclusive, of this form.

16. Is the corporation or legal entity named in paragraph 15 in turn a subsidiary?

Yes ☐ No ☐

If so, state below the name of such other parent corporation or legal entity, and submit as Exhibit No. a statement for each such corporation or legal entity answering paragraphs 11 to 16 of this form, to and including the organization having final control.

## UNINCORPORATED ASSOCIATION (OR OTHER LEGAL ENTITY)

INSTRUCTION: If applicant is an unincorporated association or a legal entity other than an individual, partnership or corporation, answer paragraphs 17 and 18.

17. State the nature of the applicant, cite the laws under which organized, and submit as Exhibit No. a copy of such laws

18. State the total number of members or persons holding any ownership interest in the applicant.

Table II

## BUSINESS AND FINANCIAL INTERESTS

**INSTRUCTIONS:** The purpose of Table II is to obtain information concerning the occupation, business, and financial interests, at the present time and during the past 5 years, of the applicant and of each party to this application named in Table I. In column (a) list the names of all individuals or organizations listed in column (a) of Table I. In column (b) state the principal occupations and businesses in which each party named is engaged at the present time or has been engaged at any time during the past 5 years, and, in addition, state any other business or financial enterprise in which such party has now or within the past 5 years has had either a 25% or greater interest or any official relationship. In each case, state in column (b) the firm name, the principal place of business, and the nature of the business engaged in. In case the party has been associated in business with any other person or persons, state the name of each such other person. In column (c) state the extent and nature of the interest, official relationship, employment, or association, giving approximate dates.

(a) Name of party

(b) Firm name, principal place of business, and nature of business

(c) Extent and nature of interest, etc. (giving dates)

## OTHER BROADCAST INTERESTS (See instructions on page 1)

19. Does applicant or any party to this application have now, or has applicant or any such party had, any interest in, or connection with, the following:

(a) Any standard, FM, or television broadcast station?

Yes ☐ No ☒

(b) Any application pending before the Commission?

Yes ☐ No ☒

(c) Any application which has been denied by the Federal Communications Commission?

Yes ☐ No ☒

(d) Any broadcast station the license of which has been revoked?

Yes ☐ No ☒

If the answer to any of the foregoing parts of this paragraph is "Yes", show particulars in the table below:

(1) Name of party having such interest

(2) Nature of interest or connection (giving dates)

(3) Name of other applicant or call of station

(4) File number

20. Is the applicant or any party to this application controlled, directly or indirectly, by any person who has any interest in or connection with any broadcast station or application of the type referred to in Paragraphs 19(a) to (d)? If so, submit as Exhibit No. giving full particulars.

Yes ☐ No ☒

21a. Are any of the parties to this application related to each other (as husband, wife, father, mother, brother, sister, son or daughter)?

Yes ☐ No ☒

b. Does any member of the immediate family (i.e., husband, wife, father, mother, brother, sister, son or daughter) or any party to this application have any interest in or connection with any other broadcast station or pending application?

Yes ☐ No ☒

c. If so, state (a) names of the persons, (b) relationship, (c) nature and extent of such interest or connection, (d) name of applicant or call letters of station, (e) file number of application, and (f) location of station or proposed station involved.

## OWNERSHIP AND CONTROL OF STATION

22. The Commission is seeking in this paragraph information as to contracts and arrangements now in existence, as well as any arrangements or negotiations, written or oral, which relate to the present or future ownership, control or operation of the station; the questions must be answered in the light of this instruction.

a. Applicant's control over the station is to be by reason of: (Indicate by check mark)



Ownership



Lease



Other authority

b. Name and address of the owner of the station (if other than the applicant)

c. Will the applicant have and maintain absolute control of the station, its equipment, and operation, including complete supervision of the programs to be broadcast? If "No", explain

Yes ☒ No ☐

d. Are there any documents, instruments, contracts or understandings relating to ownership, management, use or control of the station or facilities, or any right or interest therein?

Yes ☐ No ☒

If so, attach as Exhibit No. copies of all such documents, instruments or contracts and state the substance of oral contracts or understandings.

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Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION				Section III	
FINANCIAL QUALIFICATIONS OF BROADCAST APPLICANT		Name of Applicant					
<p>The Commission is seeking in the questions that follow information as to contracts and arrangements now in existence, as well as any arrangements or negotiations, written or oral, which relate to the present or future financing of the station; the questions must be answered in the light of this instruction.</p> <p>NOTE: If the applicant is licensee of a broadcast station, having on file with the Commission an Annual Financial Report (FCO Form 324) showing its financial position within the past 12 months, and further, if the applicant has filed yearly income statements either in the before-mentioned form, or in some other connection (see Instruction E) for the past 2 years, and (1) no substantial reduction in financial position has occurred, and (2) the applicant relies upon the financial position therein shown to defray the cost of the proposed construction, the following need not be furnished: The Exhibits required by Paragraph 2; the information required in Paragraph 3.</p>							
<p>1. a. Give estimated initial costs of making installation for which application is made. If performed under a contract for the completed work, the facts as to such contract must be stated in lieu of estimates as to the several items. In any event, the cost shown must be the costs in place and ready for service, including the amounts for labor, supervision, materials, supplies and freight.</p>							
Transmitter proper including tubes		Antenna system, including antenna-ground system, coupling equipment, transmission line		Frequency and modulation monitors		Studio technical equipment, microphones, transcription equipment, etc..	
\$		\$		\$		\$	
Acquiring land	Acquiring or constructing buildings	Other items state nature	Total	Give estimated cost of operation for first year	Give estimated revenues for first year		
\$	\$	\$	\$	\$	\$		
<p>b. State the basis of the estimates in (a) above.</p>							
<p>c. The proposed construction is to be financed and paid for in the following manner (including specified statements as to the approximate amount to be met and paid for from each source):</p>							
Existing capital	New capital	Loans from banks or others	Profits	Donations	Credit, deferred payments, etc.	Other sources (specify)	
\$	\$	\$	\$	\$	\$	\$	
<p>2. a. Attach as Exhibit No. a detailed balance sheet of applicant as at the close of a month within 90 days of the date of the application showing applicant's financial position. If the status and composition of any assets and liabilities on the balance sheet are not clearly defined by their respective titles, attach as Exhibit No. schedules which give a complete analysis of such items.</p> <p>b. Attach as Exhibit No. a statement showing the yearly net income, before and after Federal income tax, for each of the past 2 years, received by applicant from the various types of activity in which he was engaged or from any other source.</p>							
<p>3. Furnish the following information with respect to the applicant only. If the answer is "None" to any or all items, specifically so state:</p>							
a. Amount of funds on deposit in bank or other depository				b. Name and address of the bank in which deposited			
<p>c. Name and address of the party in whose name the money is deposited</p>							
<p>d. Conditions of deposit (in trust, savings, subject to check, on time deposit, who may draw on account and for what purpose, or other condition)</p>							
<p>e. Whether the funds were deposited for the specific purpose of constructing and operating the station</p>							

## FUNDS, PROPERTY, ETC., TO BE FURNISHED BY PARTIES CONNECTED WITH APPLICANT OR BY OTHERS

4. Submit as Exhibit No. \_\_\_\_\_ a statement setting forth the full name and address of each person (whether or not connected with applicant, but including partners, shareholders, or subscribers to capital stock of the applicant) who has furnished or will furnish funds, property, service, credit, loans, donations, assurances, or other things of value, or will assist in any other manner in financing station. For each person who has furnished or will furnish one percent or more supply the additional information requested in (a) to (f) below. ("Furnish" or "furnished" as herein used includes payments for capital stock or other securities, loans and other credits, gifts and any other contributions.)
- a. A description of that which has been or will be furnished by each person showing the value thereof and any encumbrances thereon.
  - b. If the funds or other things of value proposed to be used for the purchase or construction of the station have been acquired for that specific purpose, indicate the source or sources thereof.
  - c. For each person who has agreed to furnish funds or purchase stock, but who has not already done so, submit a balance sheet or, in lieu thereof, a financial statement showing all liabilities and containing assets sufficient in amount to meet those liabilities and, in addition, to indicate financial ability to comply with the terms of the agreement. Submit also a verified copy of the agreement by which each such person is legally obligated.
  - d. As to each person who has or has had in the past 5 years an interest of 25% or more in any business or financial enterprise or any official relationship to any business or financial enterprise, give full and complete disclosure of the enterprise, the name and principal place of business, the character of business engaged in, and the nature and extent of the interest in or relationship to such business.
  - e. Net income before and after Federal income tax, received for the past two years by each person who has furnished or will furnish funds, property, service, credit, loans (except financial institutions), donations, assurances, or other things of value. (A statement that income for the required periods was in excess of a certain specified amount will be sufficient.)
  - f. If applicant or any person named in this exhibit has pledged, hypothecated or otherwise encumbered any stocks or other securities for the purpose of providing applicant with funds for construction of the station herein requested, submit a statement explaining each such transaction.



Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION		Section IV																																																																																									
STATEMENT OF PROGRAM SERVICE OF BROADCAST APPLICANT		Name of Applicant																																																																																											
		Robert E. Brown																																																																																											
<b>NOTICE TO ALL APPLICANTS</b>																																																																																													
<p>The replies to the following questions constitute a representation of programming policy upon which the Commission will rely in considering the application. It is not expected that licensee will or can adhere inflexibly in day-to-day operation to the representation here made. However, since such representation will constitute, in part, the basis upon which the Commission acts on the application, time and care should be devoted to the preparation of the replies so that they will reflect accurately applicant's responsible judgment of his proposed programming policy.</p>																																																																																													
<b>INSTRUCTIONS</b>																																																																																													
<ol style="list-style-type: none"> <li>1. Television applicants are to answer only Paragraphs 10, 11, 12, and 13.</li> <li>2. This Section is divided into two parts. Paragraphs 1 to 4 of the first part in turn are divided into a left-hand column which pertains to past operation and a right-hand column which pertains to proposed operation. Applicants for new stations are to fill in only the right-hand column while applicants for authorizations for existing stations (i.e., renewal of license, assignment of license, or transfer of control) are to fill in both columns.</li> <li>3. Part II of this Section applies to all applicants.</li> <li>4. Program data on past performance are to be based on the composite week for the year preceding the date of application except in the case of renewal applications where the year preceding the expiration date of the existing license is to be used. The days comprising the composite week of each year will be designated by public notice on or about November 15th of that year.</li> <li>5. Program classifications incident to the replies to Paragraphs 2, 3, 4, and 5 below, are to be in accordance with the definitions on Page 4 of this Section.</li> </ol>																																																																																													
<b>PART I</b>																																																																																													
<b>PAST OPERATION</b>			<b>PROPOSED OPERATION (for a typical week):</b>																																																																																										
<b>1.a.</b> State actual minimum weekly schedule of operation under the present authorization, giving opening and closing time and total hours for weekdays and Sunday.			<b>b.</b> State minimum weekly schedule of operation proposed by permittee, assignee or transferee, giving opening and closing time and total hours for weekdays and Sunday.																																																																																										
			local sunrise - local sunset 70 hours per week																																																																																										
<b>2.a.</b> State for the composite week the percentage of time which was devoted to each of the following types of programs (combined totals to equal 100%).			<b>b.</b> State the percentage of time to be devoted to each of the following types of programs for a proposed typical week of operation under the authorization requested (combined totals to equal 100%). Attach program schedule for this proposed typical week.																																																																																										
<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 10%; text-align: center;"><u>Commercial</u></th> <th style="width: 10%; text-align: center;"><u>Sustaining</u></th> <th style="width: 10%; text-align: center;">(in percentages)</th> </tr> </thead> <tbody> <tr><td>(1) Entertainment (include here all programs which are intended primarily as entertainment, such as music, drama, variety, comedy, quiz, breakfast, children's etc.)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(2) Religious (include here all sermons, religious news, music, and drama, etc.)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(3) Agricultural (include here all programs containing farm or market reports or other information specifically addressed to the agricultural population)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(4) Educational (include here programs prepared by or in behalf of educational organizations, exclusive of discussion programs which should be classified under (6) below)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(5) News (include here news reports and commentaries)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(6) Discussion (include here forum, panel and round-table programs)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(7) Talks (include here all conversation programs which do not fall under Points (2), (3), (4), (5), or (6) above, including sports)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(8)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(9)</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> <tr><td>(10) Miscellaneous</td><td style="text-align: center;">_____</td><td style="text-align: center;">_____</td><td></td></tr> </tbody> </table>				<u>Commercial</u>	<u>Sustaining</u>	(in percentages)	(1) Entertainment (include here all programs which are intended primarily as entertainment, such as music, drama, variety, comedy, quiz, breakfast, children's etc.)	_____	_____		(2) Religious (include here all sermons, religious news, music, and drama, etc.)	_____	_____		(3) Agricultural (include here all programs containing farm or market reports or other information specifically addressed to the agricultural population)	_____	_____		(4) Educational (include here programs prepared by or in behalf of educational organizations, exclusive of discussion programs which should be classified under (6) below)	_____	_____		(5) News (include here news reports and commentaries)	_____	_____		(6) Discussion (include here forum, panel and round-table programs)	_____	_____		(7) Talks (include here all conversation programs which do not fall under Points (2), (3), (4), (5), or (6) above, including sports)	_____	_____		(8)	_____	_____		(9)	_____	_____		(10) Miscellaneous	_____	_____		<table style="width: 100%; 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3.a. Dividing the broadcast week into 15 minute periods, specify below the number of  $1\frac{1}{4}$  minute periods within such 15 minute periods during the composite week in which were broadcast (exclusive of non-commercial spot announcements, call letter announcements and promotional announcements for sustaining programs):

	No. of $1\frac{1}{4}$ minute periods
(1) No spot announcements or commercial continuity	_____
(2) One spot announcement	_____
(3) Two spot announcements	_____
(4) Three spot announcements	_____
(5) Four spot announcements	_____
(6) Five or more spot announcements	_____
Total number of $1\frac{1}{4}$ minute periods	_____

State the number of spot announcements (exclusive of non-commercial spot and call letter announcements, and promotional announcements for sustaining programs) broadcast during the composite week which exceeded one minute in length \_\_\_\_\_.

b. State what the practice of the station will be with respect to the number and length of spot announcements allowed in a given period.

Between 6:00 p.m. & 11:00 p.m.	
5 minute program	----1 minute
10 minute program	----2 minutes
15 minute program	----2:30 minutes
25 minute program	----2:50 minutes
30 minute program	----3:00 minutes
45 minute program	----4:30 minutes
60 minute program	----6:00 minutes
All other hours	_____
5 minute program	----1:15 minutes
10 minute program	----2:10 minutes
15 minute program	----3:00 minutes
25 minute program	----4:00 minutes
30 minute program	----4:15 minutes
45 minute program	----5:45 minutes
60 minute program	----7:00 minutes

4. In the tables below the percentages for each segment are to be computed on the basis of 100 percent of the operating hours within the particular segment for the seven days comprising the composite week (i.e., if full time operation, 70 hours for the 6 a.m. to 6 p.m. segment, 35 hours for the 6 p.m. to 11 p.m. segment, and the total weekly hours of operation between 11 p.m. and 6 a.m. for the third segment). The percentages in the column headed "Total" are to be computed on the basis of 100 percent of operating hours for the seven days.

The exact number of spot announcements should be stated, including those broadcast within participating programs, but excluding call letter announcements (call letters and location) and promotional announcements for sustaining programs.

NOTE: The purpose of the following tabulation is to enable the Commission to secure quantitative data as to the proportion of time (to be) devoted to the various classes of programs. The function of each class of program as part of a diversified program structure is discussed in the Commission's Report of March 7, 1946, entitled "Public Service Responsibility of Broadcast Licensees".

a. State the percentage of time which was devoted to each of the following classes of programs during the composite week.

PROGRAM LOG ANALYSIS  
(in percentages)

	6 a.m.- 6 p.m.	6 p.m.- 11 p.m.	All other hours	Total
(1) Network commercial (NC)	_____	_____	_____	_____
(2) Network sustaining (NS)	_____	_____	_____	_____
(3) Recorded commercial (RC)	_____	_____	_____	_____
(4) Recorded sustaining (RS)	_____	_____	_____	_____
(5) Wire commercial (WC)	_____	_____	_____	_____
(6) Wire sustaining (WS)	_____	_____	_____	_____
(7) Live commercial (LC)	_____	_____	_____	_____
(8) Live sustaining (LS)	_____	_____	_____	_____
(9) Total commercial (1+3+5+7)	_____	_____	_____	_____
(10) Total sustaining (2+4+6+8)	_____	_____	_____	_____
(11) Complete Total	100%	100%	100%	100%
(12) Actual broadcast hours	_____	_____	_____	_____
(13) No. of spot announcements (SA)	_____	_____	_____	_____
(14) No. of non-commercial spot announcements (NCSA)	_____	_____	_____	_____

b. Show in the table below the percentage of time proposed to be devoted to each of the following classes of programs during a proposed typical week of operation.

PROGRAM LOG ANALYSIS  
(in percentages)

	6 a.m.- 6 p.m.	6 p.m.- 11 p.m.	All other hours	Total
(1) Network commercial (NC)	_____	_____	_____	_____
(2) Network sustaining (NS)	_____	_____	_____	_____
(3) Recorded commercial (RC)	23.21	_____	_____	_____
(4) Recorded sustaining (RS)	4.64	_____	_____	_____
(5) Wire commercial (WC)	2.14	_____	_____	_____
(6) Wire sustaining (WS)	1.07	_____	_____	_____
(7) Live commercial (LC)	42.85	_____	_____	_____
(8) Live sustaining (LS)	26.09	_____	_____	_____
(9) Total commercial (1+3+5+7)	68.20	_____	_____	_____
(10) Total sustaining (2+4+6+8)	31.80	_____	_____	_____
(11) Complete Total	100%	100%	100%	100%
(12) Proposed broadcast hours	70	_____	_____	_____
(13) No. of spot announcements (SA)	280	_____	_____	_____
(14) No. of non-commercial spot announcements (NCSA)	105	_____	_____	_____

<p>5. If affiliated with a network, submit as Exhibit No. a list of the network sustaining programs made available to but not broadcast by your station at the hour when made available during the composite week, giving the titles, dates and local time of network origin. List opposite each the program or programs broadcast in lieu thereof, giving title, program type, whether commercial or sustaining, network, recorded or live, and whether regularly scheduled or for one week only. If the network sustaining programs listed were broadcast at a later time than when made available so state, giving time and date when broadcast.</p>	<p>7. Will the proposed station be affiliated with any network? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If the answer is "Yes", give the name of the network.</p>
<p>6. a. Attach as Exhibit No. <u>1</u> the original or one exact copy of the operating and program logs for the seven days comprising the composite week analysed in the preceding paragraphs. (If original logs are submitted they will be returned.) b. What year's composite week has been analysed in the foregoing paragraphs?</p>	<p>8. Attach as Exhibit No. <u>2</u> a narrative statement on the policy to be pursued with respect to making time available for the discussion of public issues, including illustrations of the types of programs to be broadcast and the methods of selection of subjects and participants.</p>

## PART II

<p>9. If this application is for an FM authorization will the programs of any AM station operating in the same area be duplicated? If so, Yes <input type="checkbox"/> No <input type="checkbox"/> a. How many hours per day will be devoted to duplicated programs? b. Call letters and location of the AM station</p>	<p>10. State the average number of hours per week which will be used in advertising or promoting any business, profession or activity other than broadcasting in which the applicant is engaged or financially interested either directly or indirectly. If this is an application for renewal of license, show this data for the past license period also.  none</p>
<p>c. What kinds of programs (musical, sports, etc.) will be duplicated?</p>	<p>11. If this is an application for TELEVISION authorization submit as Exhibit No. a narrative statement outlining program plans and policies. If the application relates to an existing station cover both past and future operation in this statement. 12. If the data furnished in response to the questions in this Section IV do not in the applicant's opinion adequately reflect station operation, attach as Exhibit No. a statement setting forth any additional program data that the applicant desires to call to the Commission's attention. (If the applicant feels that the program material classified in Paragraph 2 is susceptible of classifications other than those listed he may supplement Paragraph 2 with an explanatory statement in this Exhibit.)</p>
<p>13. State applicant's general plans for staffing the station, including the number of employees in each department (i.e. program, commercial, technical, etc.), and the names, residence and citizenship of the general manager, station manager, program director and other department heads who have been employed or whom the applicant expects to employ.</p>	

See Exhibit 30

PROGRAM CLASSIFICATION

A commercial program (C) is any program the time for which is paid for by a sponsor or any program which is interrupted by a spot announcement (as defined below), at intervals of less than 1 1/2 minutes. A network program shall be classified as "commercial" if it is commercially sponsored on the network, even though the particular station is not paid for carrying it--unless all commercial announcements have been deleted from the program by the station. Cooperative programs furnished to its affiliates by a network which are available for local sponsorship are network sustaining programs (NS) if no local sponsorship is involved and are network commercial programs (NC) where there is local sponsorship even though the commercial announcement is made by the station's local announcer.

(It will be noted that any program which is interrupted by a commercial announcement is classified as a commercial program, even though the purchaser of the interrupting announcement has not also purchased the time preceding and following. The result is to classify so called "participating" programs as commercial. Without such a rule, a 15-minute program may contain 5 or even more minutes of advertising and still be classified as "sustaining." Under the proposed definition, a program may be classified as "sustaining" although preceded and followed by spot announcements, but if a spot announcement interrupts a program, the program must be classified as "commercial.")

A sustaining program (S) is any program which is neither paid for by a sponsor nor interrupted by a spot announcement (as defined below).

A network program (N) is any program furnished to the station by a network or another station. Transcribed delayed broadcasts of network programs are classified as "network" not "re-recorded." Cooperative programs furnished to its affiliates by a network which are available for local sponsorship are network sustaining programs (NS) if no local sponsorship is involved and are network commercial programs (NC) where there is local sponsorship even though the commercial announcement is made by the station's local announcer. Programs are classified as network whether furnished by a nationwide, regional, or special network or by another station.

A recorded program (R) is any program which uses phonograph records, electrical transcriptions, or other means of mechanical reproduction in whole or in part--except where the recording is wholly incidental to the program and is limited to background sounds, sound effects, identifying themes, musical "bridges", etc. A program part transcribed or recorded and part live is classified as "recorded" unless the recordings are wholly incidental, as above. A transcribed delayed broadcast of a network program, however, is not classified as "recorded" but as "network." A recorded program which is a local live program produced by the station and recorded for later broadcasting by the station shall be considered a local live program.

A wire program (W) is any program the text of which is distributed to a number of stations by telegraph, teletype, or similar means, and read in whole or in part by a local announcer. Programs distributed by the wire news services are "wire" programs. A news program which is part wire and in part of non-syndicated origin is classified as "wire" if more than half of the program is usually devoted to the reading verbatim, or virtually verbatim, of the syndicated wire text, and otherwise is classified as "live."

A local live program (L) is any local program which uses live talent exclusively, whether originating in the station's studios or by remote control. Programs furnished to a station by a network or another station, however, are not classified as "live" but as "network." A program which uses recordings in whole or in part, except in a wholly incidental manner, should not be classified as "live" but as "recorded." Wire programs, as defined above, should likewise not be classified as "live." A recorded program which is a local live program produced by the station and recorded for later broadcasting by the station shall be considered a local live program.

A non-commercial spot announcement (NCSA) is an announcement which is not paid for by a sponsor and which is devoted to a non-profit cause--e.g., war bonds, Red Cross, public health, civic announcements, etc. Promotional, participating announcements, etc. should not be classified as "non-commercial spot announcements" but as "spot announcements." War bond, Red Cross, civic and similar announcements for which the station receives remuneration should not be classified as "non-commercial spot announcements" but as "spot announcements."

A spot announcement (SA) is any announcement which is neither a non-commercial spot announcement (as above defined) nor a station identification announcement (call letters and location). An announcement should be classified as a "spot announcement," whether or not the station receives remuneration, unless it is devoted to a nonprofit cause. Sponsored time signals, sponsored weather announcements, etc. are spot announcements. Unsponsored time signals, weather announcements, etc., are program matter and not classified as announcements. Station identification announcements should not be classified as either non-commercial spot announcements or spot announcements, if limited to call letters, location, and identification of the licensee and network.

Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION		Section V-A													
<b>STANDARD BROADCAST ENGINEERING DATA</b>		<b>Name of applicant</b>															
<b>1. Purpose of authorization applied for: (Indicate by check mark)</b> (If application is for a new station or for any of the changes numbered B through F, complete all paragraphs of this form; if change G is of a character which will change coverage or increase the overall height of the antenna structure more than 15 feet, answer all paragraphs, otherwise complete only paragraphs 2 and 3 and the appropriate other paragraphs; for changes H through M, complete only paragraph 2 and the appropriate other paragraphs; for change N complete only paragraphs 2 and 13.)																	
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<b>3. Antenna</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Non-directional Day <input type="checkbox"/></td> <td style="width: 60%;">Directional Day <input type="checkbox"/></td> </tr> <tr> <td>Non-directional Night <input type="checkbox"/></td> <td>Directional Night <input type="checkbox"/></td> </tr> <tr> <td colspan="2">Directional day and night using different patterns <input type="checkbox"/></td> </tr> </table> <p>(If a directional antenna is proposed submit complete engineering data on each element. Show clearly whether directional operation is for day or night or both. If day and night patterns are different give full information on each pattern. This information is in addition to the information in Paragraph 3 and must be submitted in triplicate as Exhibit No. and signed by the engineer who designed the antenna system.)</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">Height of vertical lead in feet (height above base inulator or base if grounded)</td> <td style="width: 50%; border-bottom: 1px solid black;">If top loading is used, describe</td> </tr> </table> <p>Is antenna shunt excited?      Yes <input type="checkbox"/>      No <input type="checkbox"/></p> <p>If so give length of slant wire feed in feet _____</p> <p>Height of connection to tower above earth in feet _____</p> <p>Distance from coupling apparatus to tower in feet _____</p> <p>If not fully described above, give further details and dimensions including any high frequency antennas mounted on tower and associated isolation circuits as Exhibit No. .</p>			Non-directional Day <input type="checkbox"/>	Directional Day <input type="checkbox"/>	Non-directional Night <input type="checkbox"/>	Directional Night <input type="checkbox"/>	Directional day and night using different patterns <input type="checkbox"/>		Height of vertical lead in feet (height above base inulator or base if grounded)	If top loading is used, describe	<b>5. Modulation monitor</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 70%; border-bottom: 1px solid black;">Make</td> <td style="width: 30%; border-bottom: 1px solid black;">Type No.</td> </tr> </table>			Make	Type No.		
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Make	Type No.																
<b>8. Attach in triplicate as Exhibit No.      aerial photo-</b> graphs of proposed site taken in clear weather from a low enough altitude to permit identification of structures and houses in the vicinity. The photographs should be marked so as to show compass directions, exact boundary lines of proposed site and the locations of the 250 and 500 mv/m contours for both day and night operation.			<b>9. Attach in triplicate as Exhibit No.      map or maps</b> (same map or maps supplied for Paragraph 7 may be used) having reasonable scales showing the following: (Note: See Standards of Good Engineering Practice Concerning Standard Broadcast Station, Section I. Maps showing service contours shall exclude the areas which do not receive adequate service due to interference from electrical apparatus. All towns and cities having population in excess of those given in Table II of Section I of the Standards of Good Engineering Practice or other areas not receiving adequate service due to interference from electrical apparatus shall not be included in the tabulation of areas and populations within the service contours. The 1940 or later Census Minor Civil Division maps should be used in making population counts, subtracting any towns or cities not receiving adequate service and where the contour cuts a minor division, assume uniform distribution of population within division to determine the population included in the contours unless a more accurate count is made.)														
(a) The 500, 250, 25, 5, and 2 mv/m contours of the proposed station;																	

Broadcast Application	STANDARD BROADCAST ENGINEERING DATA	Section V-A, Page 2																								
<p>9. (Continued)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>(b) The normally protected contours of the station as proposed by the application for both night and day operation (without regard to interference from other stations);</p> <p>(c) The interference-free contours of the station as proposed by the application for both night and day operation including nighttime computed RSS for Class IV station (if station would be limited inside the normally protected contours by any other station or stations);</p> </div> <div style="width: 48%;"> <p>(d) The present normally protected or interference-free contours of other station to which objectionable interference may be caused by operation of the station as proposed by the application;</p> <p>(e) The interference-free contours of the stations in (d) above considering the interference resulting from the operation of the station as proposed by the application.</p> </div> </div>																										
<p>10. Attach as Exhibit No. _____ a statement giving the conductivities, effective field intensities, interference fields and other pertinent data used for determining the contours required in Paragraph 9.</p>																										
<p>11. Areas and population</p>																										
<p>a. Give the number of persons residing in the following contours</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;"></th> <th style="width: 15%;">500 mv/m</th> <th style="width: 15%;">250 mv/m</th> <th style="width: 15%;">25 mv/m</th> <th style="width: 15%;">5 mv/m</th> <th style="width: 15%;">2 mv/m</th> </tr> </thead> <tbody> <tr> <td>Proposed:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Night</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>Day</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table>				500 mv/m	250 mv/m	25 mv/m	5 mv/m	2 mv/m	Proposed:						Night	_____	_____	_____	_____	_____	Day	_____	_____	_____	_____	_____
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<p>12. Other broadcast service in the area</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>(a) Attach as Exhibit No. _____ copies of map(s) showing service areas of all other broadcast stations serving a whole or part of the proposed <u>daytime</u> service area.</p> <p>(b) Attach as Exhibit No. _____ copies of map(s) showing service areas of all other broadcast stations serving a whole or part of the proposed <u>nighttime</u> service area.</p> </div> <div style="width: 48%;"> <p>13. Proposed location of main studio</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">State _____</td> <td style="width: 50%;">County _____</td> </tr> <tr> <td>City or town _____</td> <td>Street and number _____</td> </tr> <tr> <td colspan="2">Other studios maintained by station _____</td> </tr> </table> </div> </div>			State _____	County _____	City or town _____	Street and number _____	Other studios maintained by station _____																			
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<p>I certify that I am the Technical Director, Chief Engineer or Consulting Engineer for the applicant of the radio station for which this application is submitted and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.</p>																										
<p>_____ Technical Director, Chief Engineer or Consulting Engineer</p>																										
<p>Date _____</p>																										

Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION		Section V-B																	
<b>FM BROADCAST ENGINEERING DATA</b>		Name of applicant																			
<p>1. Purpose of authorization applied for: (Indicate by check mark)</p> <p>(If application is for a new station or for any of the changes numbered B through J, complete all paragraphs of this form; if change F is of a character which will change coverage or increase the overall height of the antenna structure more than 15 feet, answer all paragraphs, otherwise complete only paragraphs 2 and 3 and the appropriate other paragraphs; for changes G through I, complete only paragraph 2 and the appropriate other paragraphs; for change J, complete only paragraphs 2 and 14.)</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <p>A. <input type="checkbox"/> Construct a new station</p> <p>B. <input type="checkbox"/> Change effective radiated power or antenna height above average terrain</p> <p>C. <input type="checkbox"/> Change transmitter location</p> <p>D. <input type="checkbox"/> Change frequency</p> <p>E. <input type="checkbox"/> Approval of site and antenna</p> </div> <div style="width: 50%;"> <p>F. <input type="checkbox"/> Change antenna system</p> <p>G. <input type="checkbox"/> Change transmitter</p> <p>H. <input type="checkbox"/> Install auxiliary or alternate main transmitter</p> <p>I. <input type="checkbox"/> Other changes (specify)</p> <p>J. <input type="checkbox"/> Change studio location</p> </div> </div>																					
<p>2. Facilities requested</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 2px;">Frequency</td> <td style="width: 33%; padding: 2px;">Effective radiated power in kilowatts</td> <td style="width: 33%; padding: 2px;">Antenna height above average terrain in feet</td> </tr> </table>			Frequency	Effective radiated power in kilowatts	Antenna height above average terrain in feet	<p>4. Transmitter</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="padding: 2px;">Make</td> </tr> <tr> <td style="width: 70%; padding: 2px;">Type number</td> <td style="padding: 2px;">Rated power</td> </tr> </table>			Make		Type number	Rated power									
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<p>3. (a) Antenna structure:</p> <p>Is the proposed construction in the immediate vicinity or does it serve to modify the construction of any standard broadcast station, FM broadcast station, television broadcast station, or other class of radio station? If "Yes", attach as Exhibit No. complete engineering data thereon.</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Will proposed structure be constructed on the top of a building? If "Yes", state height of building (distance from ground datum to base of proposed structure) in feet.</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 2px;">Overall height in feet above ground level. (Do not include the height of any obstruction lighting which may be required.)</td> <td style="width: 50%; padding: 2px;">Overall height in feet above mean sea level. (Do not include the height of any obstruction lighting which may be required.)</td> </tr> </table> <p>Height of antenna radiation center in feet above mean sea level.</p>			Overall height in feet above ground level. (Do not include the height of any obstruction lighting which may be required.)	Overall height in feet above mean sea level. (Do not include the height of any obstruction lighting which may be required.)	<p>(If the above transmitter is composite or of a type not having received approval by the F.C.C., attach as Exhibit No. copies of a complete showing of transmitter details in accordance with the Standards of Good Engineering Practice for FM Broadcast Stations. Showing should include schematic diagram and full details of frequency control. If changes are to be made in a licensed transmitter include schematic diagram and give full details of the changes.)</p>																
Overall height in feet above ground level. (Do not include the height of any obstruction lighting which may be required.)	Overall height in feet above mean sea level. (Do not include the height of any obstruction lighting which may be required.)																				
<p>(b) Antenna data</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 2px;">Make</td> <td style="width: 33%; padding: 2px;">Type no. or description</td> <td style="width: 33%; padding: 2px;">No. of sections</td> </tr> <tr> <td style="padding: 2px;">Effective free space field intensity at one mile in mv/m for one kilowatt antenna input power</td> <td style="padding: 2px;">Antenna field gain</td> <td style="padding: 2px;">Antenna power gain</td> </tr> </table> <p>Is horizontal polarization proposed? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", attach as Exhibit No. complete engineering data on the antenna and the effective radiated power proposed.</p> <p>Is directional antenna proposed? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If "Yes", attach as Exhibit No. complete engineering data thereon.</p>			Make	Type no. or description	No. of sections	Effective free space field intensity at one mile in mv/m for one kilowatt antenna input power	Antenna field gain	Antenna power gain	<p>5. Modulation monitor</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 2px;">Make</td> <td style="padding: 2px;">Type No.</td> </tr> </table> <p>6. Frequency monitor</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 2px;">Make</td> <td style="padding: 2px;">Type No.</td> </tr> </table> <p>7. Transmission line proposed to supply power to the antenna from the transmitter</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 2px;">Make</td> <td style="width: 33%; padding: 2px;">Type No.</td> <td style="width: 33%; padding: 2px;">Description</td> </tr> <tr> <td style="padding: 2px;">Size (nominal transverse dimension) in inches</td> <td style="padding: 2px;">Length in feet</td> <td style="padding: 2px;">Rated efficiency in percent for this length</td> </tr> </table>			Make	Type No.	Make	Type No.	Make	Type No.	Description	Size (nominal transverse dimension) in inches	Length in feet	Rated efficiency in percent for this length
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<p>8. Proposed operation</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; padding: 2px;">Transmitter power output in kilowatts</td> <td style="padding: 2px;">Power dissipation within transmission line in kilowatts</td> </tr> <tr> <td style="padding: 2px;">Antenna input power in kilowatts</td> <td style="padding: 2px;">Effective radiated power in kilowatts (Must be same as shown in Para. 2)</td> </tr> </table>			Transmitter power output in kilowatts	Power dissipation within transmission line in kilowatts	Antenna input power in kilowatts	Effective radiated power in kilowatts (Must be same as shown in Para. 2)	<p>9. Will the studios, microphones, and other equipment proposed for transmission of programs be designed for compliance with Standards of Good Engineering Practice Concerning FM Broadcast Stations? Yes <input type="checkbox"/> No <input type="checkbox"/></p>														
Transmitter power output in kilowatts	Power dissipation within transmission line in kilowatts																				
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10. (a) Attach as Exhibit No. \_\_\_\_\_ a map(s) (topographic where obtainable, such as U. S. Geological Survey quadrangles) for the area within 15 miles of the proposed transmitter location and show drawn thereon the following data:
1. Proposed transmitter location—accurately plotted;
  2. Transmitter location and call letters of all radio stations (except amateur) and the location of established commercial and government receiving stations within 2 miles of the proposed transmitter location;
  3. Proposed location of main studio;
  4. Character of the area within 2 miles of proposed transmitter location, suitably designated as to residential, business, industrial, and rural nature;
  5. At least eight radials each extending to a distance of ten or more miles from the proposed transmitter location, one or more of which must extend through the principal city or cities to be served.

(b) Attach as Exhibit No. \_\_\_\_\_ profile graphs for the radials in (a)(5) above. Each graph shall show the elevation of the antenna radiation center. Identify each graph by its bearing from the proposed transmitter location. Direction true north shall be zero azimuth and angles measured clockwise. Show source of topographical data on each.

11. From the profile graphs in 10(b), for the eight mile distance between two and ten miles from the proposed transmitter location, and in accordance with the procedure prescribed in the Standards of Good Engineering Practice, supply the following tabulation of data: (if proposed location is adjacent to the sea coast or the Great Lakes omit from this tabulation all radials which lie over water substantially the entire distance between two miles from the proposed transmitter location and the predicted 50 microvolt per meter contour.)

Radial bearing (degrees true)	Average elevation of radial (2-10 mi.) in feet above mean sea level	Height in feet of antenna radiation center above average elevation of radial (2-10 mi.)	Free space field intensity in millivolts per meter at one mile	Predicted distance in miles to the 1 mv/m contour	Predicted distance in miles to the 50 uv/m contour
_____°	_____ feet	_____ feet	_____ mv/m	_____ mi.	_____ mi.
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Antenna height above average terrain \_\_\_\_\_ feet  
(Average of above listed heights—must be identical with Paragraph 2)

12. Attach as Exhibit No. \_\_\_\_\_ map(s) (Sectional Aeronautical Charts where obtainable) of the area proposed to be served and show drawn thereon:

- (a) Proposed transmitter location and the radials along which the profile graphs have been prepared;
- (b) The 1 mv/m and the 50 uv/m contours predicted;
- (c) Scale of miles.

Areas and population: (1940 or later census.)  
(All towns and cities having population in excess of 10,000 and receiving signal intensity of less than 1 mv/m shall not be included in the tabulation of areas and populations within the service contours.)

Area (sq. mi.) within 1 mv/m contour	Population within 1 mv/m contour
Area (sq. mi.) within 50 uv/m contour	Population within 50 uv/m contour
Area (sq. mi.) within interference free contour (if station would be limited inside the 50 uv/m contour by any other station or stations).	Population within interference free contour (if station would be limited inside the 50 uv/m contour by any other station or stations).
Number of persons residing within 0.5 mile of proposed transmitter location	
Number of persons residing within 0.25 mile of proposed transmitter location	
Specify the source of population data as used in this paragraph	

13. Proposed transmitter location

State	County	City
Number and street (or other indication of location)		

14. Proposed location of main studio

State	County
City or town	Street and number

Other studios proposed

I certify that I am the Technical Director, Chief Engineer, or Consulting Engineer of the radio station for which this application is submitted and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Date \_\_\_\_\_

Technical Director, Chief Engineer, or Consulting Engineer



Broadcast Application		FEDERAL COMMUNICATIONS COMMISSION		Section V-3																									
TELEVISION BROADCAST ENGINEERING DATA		Name of applicant																											
<p>1. Purpose of authorization applied for: (Indicate by check mark)</p> <p>(If application is for a new station or for any of the changes numbered B through E, complete all paragraphs of this form; if change F is of a character which will change coverage or increase the overall height of the antenna structure more than 15 feet, answer all paragraphs, otherwise complete only paragraphs 2 and 3 and the appropriate other paragraphs; for changes G through I, complete only paragraph 2 and the appropriate other paragraphs; for change J, complete only paragraphs 2 and 13.)</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <p>A. <input type="checkbox"/> Construct a new station</p> <p>B. <input type="checkbox"/> Change effective radiated power or antenna height above average terrain</p> <p>C. <input type="checkbox"/> Change transmitter location</p> <p>D. <input type="checkbox"/> Change frequency</p> <p>E. <input type="checkbox"/> Approval of site and antenna</p> </div> <div style="width: 50%;"> <p>F. <input type="checkbox"/> Change antenna system</p> <p>G. <input type="checkbox"/> Change transmitter</p> <p>H. <input type="checkbox"/> Install auxiliary or alternate main transmitter</p> <p>I. <input type="checkbox"/> Other changes (specify)</p> <p>J. <input type="checkbox"/> Change studio location</p> </div> </div>																													
<p>2. Facilities requested</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: center;">Frequency</th> <th style="text-align: center;">Channel number</th> </tr> <tr> <th style="text-align: center;">From</th> <th style="text-align: center;">To</th> <th></th> </tr> </thead> <tbody> <tr> <td colspan="2">Effective radiated power in kilowatts (visual)</td> <td>Antenna height above average terrain in feet. (Must agree with height given in Para. 10 of this Section)</td> </tr> </tbody> </table>			Frequency		Channel number	From	To		Effective radiated power in kilowatts (visual)		Antenna height above average terrain in feet. (Must agree with height given in Para. 10 of this Section)	<p>4. Transmitters</p> <p>(a) Visual</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> <th style="text-align: center;">Rated power</th> </tr> </thead> <tbody> <tr> <td colspan="3"> </td> </tr> </tbody> </table> <p>(b) Aural</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> <th style="text-align: center;">Rated power</th> </tr> </thead> <tbody> <tr> <td colspan="3"> </td> </tr> </tbody> </table> <p>If the above transmitters are composite or of types not having received approval by the F.C.C., attach as Exhibit No. copies of a complete showing of transmitter details in accordance with the Standards of Good Engineering Practice for Television Broadcast Stations. Showing should include schematic diagrams, types and names of manufacturers of tubes, operating constants of the last radio stage, full details of frequency control, vestigial side-band filters, multiplex networks, and isolation networks. If changes are to be made in a licensed transmitter include a schematic diagram and give full details of the changes.</p> <p>(c) Describe in Exhibit No. _____ means which will be used for determining and maintaining power output of the transmitters to the value specified in this application.</p>			Make	Type No.	Rated power				Make	Type No.	Rated power						
Frequency		Channel number																											
From	To																												
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Make	Type No.	Rated power																											
Make	Type No.	Rated power																											
<p>3. (a) Antenna structure</p> <p>Is the proposed construction in the immediate vicinity or does it serve to modify the construction of any standard broadcast station, FM broadcast station, television broadcast station, or other class of radio station? If "Yes", attach as Exhibit No. _____ complete engineering data thereon.</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Will proposed structure be constructed on the top of a building? If "Yes", state height of building (distance from ground datum to base of proposed structure) in feet.</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Overall height in feet above ground level. (Do not include the height of any obstruction lighting which may be required.)</td> <td style="width: 50%;">Overall height in feet above mean sea level. (Do not include the height of any obstruction lighting which may be required.)</td> </tr> <tr> <td> </td> <td> </td> </tr> </table> <p>Height of antenna radiation center in feet above mean sea level.</p>			Overall height in feet above ground level. (Do not include the height of any obstruction lighting which may be required.)	Overall height in feet above mean sea level. (Do not include the height of any obstruction lighting which may be required.)			<p>5. Modulation monitors</p> <p>(a) Visual</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> </tr> </thead> <tbody> <tr> <td colspan="2"> </td> </tr> </tbody> </table> <p>(b) Aural</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> </tr> </thead> <tbody> <tr> <td colspan="2"> </td> </tr> </tbody> </table>			Make	Type No.			Make	Type No.														
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Make	Type No.																												
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<p>7. Transmission line proposed to supply power to the antenna from the transmitter</p> <p>(a) Visual</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> <th style="text-align: center;">Description</th> </tr> </thead> <tbody> <tr> <td colspan="3"> </td> </tr> </tbody> </table> <p>Size (nominal transverse dimensions) in inches      Length in feet      Rated efficiency in percent for this length</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"> </td> <td style="width: 33%;"> </td> <td style="width: 33%;"> </td> </tr> </table>			Make	Type No.	Description							<p>(b) Aural</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Make</th> <th style="text-align: center;">Type No.</th> <th style="text-align: center;">Description</th> </tr> </thead> <tbody> <tr> <td colspan="3"> </td> </tr> </tbody> </table> <p>Size (nominal transverse dimensions) in inches      Length in feet      Rated efficiency in percent for this length</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"> </td> <td style="width: 33%;"> </td> <td style="width: 33%;"> </td> </tr> </table>			Make	Type No.	Description												
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## 7. Transmission line (Continued)

## (b) Aural (if separate)

Make	Type No.	Description
Size (nominal transverse dimension) in inches	Length in feet	Rated efficiency in percent for this length

## 8. Proposed operation

## (a) Visual

Transmitter power output in kilowatts	Side-band filter loss	Multiplexer loss
Input to transmission line	Antenna input power	Effective radiated power

## (b) Aural

Transmitter power output in kilowatts	Multiplexer loss	
Input to transmission line	Antenna input power	Effective radiated power

9. (a) Attach as Exhibit No. \_\_\_\_\_ a map(s) (topographic where obtainable, such as U. S. Geological Survey quadrangles) for the area within 15 miles of the proposed transmitter location and show drawn thereon the following data:

1. Proposed transmitter location--accurately plotted;
2. Transmitter location and call letters of all radio stations (except amateur) and the location of established commercial and government receiving stations within 2 miles of the proposed transmitter location;
3. Proposed location of main studio;
4. Character of the area within 2 miles of proposed transmitter location, suitably designated as to residential, business, industrial, and rural nature;
5. At least eight radials each extending to a distance of ten or more miles from the proposed transmitter location, one or more of which must extend through the principal city or cities to be served.

(b) Attach as Exhibit No. \_\_\_\_\_ profile graph for the radials in (a)(5) above. Each graph shall show the elevation of the antenna radiation center. Identify each graph by its bearing from the proposed transmitter location. Direction true north shall be zero azimuth and angles measured clockwise.

10. From the profile graphs in 9(b), for the eight mile distance between two and ten miles from the proposed transmitter location, and in accordance with the procedure prescribed in the Standards of Good Engineering Practice, supply the following tabulation of data: (If proposed location is adjacent to the sea coast or the Great Lakes omit from this tabulation all radials which lie over water substantially the entire distance between two miles from the proposed transmitter location and the predicted 0.5 millivolt per meter contour.)

Radial bearing (degrees true)	Average elevation of radial (2-10 mi.) in feet above mean sea level	Height in feet of antenna radiation center above average elevation of radial (2-10 mi.)	Free space field intensity in millivolts per meter at one mile	Predicted distance in miles to the 5.0 mv/m contour	Predicted distance in miles to the 0.5 mv/m contour
_____°	_____ feet	_____ feet	_____ mv/m	_____ mi.	_____ mi.
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Antenna height above average terrain \_\_\_\_\_ feet (Must be identical with Paragraph 2)

11. Attach as Exhibit No. \_\_\_\_\_ map(s) (Sectional Aeronautical Charts where obtainable) of the area proposed to be served and shown drawn thereon:

(a) Proposed transmitter location and the radials along which the profile graphs have been prepared;

(b) The 5 mv/m and the 0.5 mv/m contours predicted;

(c) Scale of miles.

## Areas and population: (1940 or later census)

Area (sq. mi.) within 5 mv/m contour

Population within 5 mv/m contour

Area (sq. mi.) within 0.5 mv/m contour

Population within 0.5 mv/m contour

(Total)

Population within cities over 10,000 located between 5 mv/m and 0.5 mv/m contours.

## Population receiving service

(In determining the population served it is considered that cities having over 10,000 population and located beyond the 5 mv/m contour do not receive service.)

Number of persons residing within 0.5 mile of proposed transmitter location

Number of persons residing within 0.25 mile of proposed transmitter location

Specify the source of population data as used in this paragraph

## 12. Proposed transmitter location

State \_\_\_\_\_ County \_\_\_\_\_ City \_\_\_\_\_

Number and street (or other indication of location)

## 11. Proposed location of main studio

State	County	Other studios proposed
City or town	Street and number	

I certify that I am the Technical Director, Chief Engineer, or Consulting Engineer of the radio station for which this application is submitted and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Date \_\_\_\_\_

\_\_\_\_\_  
Technical Director, Chief Engineer, or Consulting Engineer



Broadcast Application			FEDERAL COMMUNICATIONS COMMISSION				Section V-G, (Antenna)	
<b>ANTENNA AND SITE INFORMATION</b> (Supply 6 copies of this Section and 4 copies of the required exhibits)			Name of applicant					
			Address					
1. Location of antenna			Legal counsel					
State	County	City or Town						
Street address or location with respect to highways or other landmarks			Address					
			Consulting Engineer					
Township			Section			Range or Plat		
Geographic coordinates (to be determined to nearest second. For directional antenna give coordinates of center of array.) For single vertical radiator give tower location.			Class of station					
			Facilities requested					
North latitude			2. Features of surrounding terrain					
West longitude			If there are hills or structures having a height one third or greater than height of proposed antenna system within 2000 feet of the proposed location, submit as Exhibit No. a map or sketch indicating such features. Not necessary to list more than the highest elevation within each 30 degree sector of the 2000-foot circle. In addition, terrain features or structures at greater distances should be indicated if, in the opinion of the applicant, they may influence painting and marking requirements in the interest of air safety.					
How were coordinates determined?								
Describe property on which antenna system is to be located. (I.e., farm, residential subdivision, building by name, unused swamp or hill). Attach as Exhibit No. a plat of proposed site prepared by a qualified civil engineer clearly indicating location of tower(s) and geographic coordinates as stated above.			Submit as Exhibit No. portion of current Sectional Aeronautical Chart on which site is accurately plotted and marked.					
			Name, distance, and bearing to nearest boundary of nearest airport (or landing field) within 5 miles					
			Designation, distance, and bearing to center line of nearest established airway within 10 miles					
			Attach as Exhibit No. aerial photographs (or other suitable photographs) of proposed site taken in clear weather from a low enough altitude to permit identification of structures and houses in the vicinity up to one mile from site. The photographs should be marked as to show compass directions and should show boundary lines of proposed site.					
3. Description of antenna system								
Type								
Description of tower(s)								
Self-supporting			Guyed			Tubular (Pole)		
			#1	#2	#3	#4	#5	#6
Height of radiating elements								
Overall height above ground								
Overall height above mean sea level								
For multi-element standard broadcast directional antenna system submit as Exhibit No. horizontal plan for proposed antenna system, indicating heights of elements above ground, showing orientation and spacing in feet. Clearly indicate existing towers.								
Submit as Exhibit No. vertical plan sketch for the proposed total structure, including supporting building, if any, giving heights above ground in feet for all significant features. Clearly indicate existing portions, noting painting and lighting.								
Is the proposed antenna system designed so that obstruction lights may be installed and maintained at the uppermost point(s)? Yes <input type="checkbox"/> No <input type="checkbox"/>								
4. Is the proposed site the same or immediately adjoining the transmitter-antenna site of other stations authorized by the Commission or specified in another application pending before the Commission? If the answer is "Yes", give			Signature of person preparing data					
Call letters								
File numbers			Occupation					

# EXHIBIT #1

PROGRAM LOG      Monday, Wednesday, Friday

<u>TIME</u>	<u>CLASSIFICATION</u>	<u>TITLE</u>
8:00	RC <sup>1</sup>	Good Morning
8:15	RC	Good Morning
8:30	LS <sup>2</sup>	Morning Devotions
8:45	LC <sup>3</sup>	News
9:00	LC	Make Ours Music
9:15	LC	Thoughts For Today
9:30	LS	Plane Facts
9:45	RS <sup>4</sup>	United States Marine Band
10:00	LC	Mom's Kitchen
10:15	LC	Mom's Kitchen
10:30	LC	Morning Moods
10:45	LS	Civic Affairs
11:00	LC	Town Crier
11:15	LC	Hi Neighbor
11:30	LS	Church Affairs
11:45	RC	Bing Crosby
12:00	LC	News
12:15	LS	Farm Forum
12:30	LS	Veterans' Friend
12:45	LC	Welcome Tourist
1:00	LS	Jobs Available
1:15	RC	Trouble Shooter
1:30	RC	Your Request
1:45	RC	Your Request
2:00	LC	Meet St. Ignace
2:15	LS	Salute the North
2:30	LS	The School Speaks
2:45	LS	The School Speaks
3:00	LC	Sports Recap
3:15	RC	Off the Record
3:30	RC	Off the Record
3:45	RC	Off the Record
4:00	RS	Coast Guard
4:15	LS	Local Sports
4:30	RS	Here's to Veterans
4:45	LS	Teen Time
5:00	LC	News
5:15	LC	Mackinac Doings
5:30	LC	Dinner Music
5:45	LC	Dinner Music
6:00		Sign Off

<sup>1</sup>Recorded Commercial

<sup>2</sup>Local Sustaining

<sup>3</sup>Local Commercial

<sup>4</sup>Recorded Sustaining

PROGRAM LOG      Tuesday and Thursday

<u>TIME</u>	<u>CLASSIFICATION</u>	<u>TITLE</u>
8:00	RC	Good Morning
8:15	RC	Good Morning
8:30	LS	Morning Devotions
8:45	LC	News
9:00	LC	Lullaby Parade
9:15	LS	What's In the Library
9:30	WC <sup>5</sup>	Strait Interviews
9:45	LC	Tourist Tales
10:00	LC	Mom's Kitchen
10:15	LC	Mom's Kitchen
10:30	LC	Morning Moods
10:45	LS	Civic Affairs
11:00	LC	Town Crier
11:15	LC	Studio Fun
11:30	WC	Meet Mackinaw City
11:45	RC	Bing Crosby
12:00	LC	News
12:15	LS	Farm Forum
12:30	LC	Taxi Trends
12:45	LC	Taxi Trends
1:00	WC	Indian Guide
1:15	RC	Trouble Shooter
1:30	RC	Your Request
1:45	RC	Your Request
2:00	RC	Your Request
2:15	LC	Fisherman's Paradise
2:30	LC	Manhattan Music
2:45	LC	Manhattan Music
3:00	LC	Sports Recap
3:15	RC	Off the Record
3:30	RC	Off the Record
3:45	RC	Off the Record
4:00	WS <sup>6</sup>	Soo News
4:15	LS	Local Sports
4:30	RS	Here's to Veterans
4:45	LS	Teen Time
5:00	LC	News
5:15	LS	Scouts Speak
5:30	LC	Dinner Music
5:45	LC	Dinner Music
6:00		Sign Off

<sup>5</sup>Wire Commercial

<sup>6</sup>Wire Sustaining

## PROGRAM LOG

Saturday

<u>TIME</u>	<u>CLASSIFICATION</u>	<u>TITLE</u>
8:00	RC	Good Morning
8:15	RC	Good Morning
8:30	LS	Morning Devotions
8:45	LC	News
9:00	LC	Make Ours Music
9:15	LC	Thoughts for Today
9:30	LC	Studio Jamborie
9:45	LC	Studio Jamborie
10:00	LC	Mom's Kitchen
10:15	LC	Mom's Kitchen
10:30	LC	Morning Moods
10:45	LS	Civic Affairs
11:00	LC	Town Crier
11:15	LC	Hi Neighbor
11:30	LS	Church Affairs
11:45	RC	Stan Kenton
12:00	LC	News
12:15	LS	Meet the Farmer
12:30	LS	Meet the Farmer
12:45	LC	Welcome Tourist
1:00	LS	Your Friendly Forest
1:15	RC	Trouble Shooter
1:30	RC	Your Request
1:45	RC	Your Request
2:00	LC	Who's in Town
2:15	LC	Theatre Variety
2:30	LC	Theatre Variety
2:45	LC	Theatre Variety
3:00	LC	Sports Recap
3:15	RC	Off the Record
3:30	RC	Off the Record
3:45	RC	Off the Record
4:00	MS	College Extension
4:15	LC	Bowling Fans
4:30	RS	Here's to Veterans
4:45	LS	Teen Time
5:00	LC	News
5:15	LC	Mackinac Doings
5:30	LC	Dinner Music
5:45	LC	Dinner Music
6:00		Sign Off



## PROGRAM LOG

Sunday

<u>TIME</u>	<u>CLASSIFICATION</u>	<u>TITLE</u>
8:00	RC	Good Morning
8:15	RC	Good Morning
8:30	LS	Morning Devotions
8:45	LC	News
9:00	LS	Church Organ
9:15	LS	Church Organ
9:30	LS	St. Ignace Church Hour
9:45	LS	St. Ignace Church Hour
10:00	LS	St. Ignace Chamber of Commerce
10:15	LC	Voice of the Sportsman
10:30	LS	Boys Church Choir
10:45	LS	Beautify St. Ignace
11:00	RC	Christian Science News
11:15	RC	Christian Science News
11:30	RC	Morning Melodies
11:45	RS	Health Notes
12:00	LC	News
12:15	LC	Sports Afield
12:30	LS	Organ Requests
12:45	LS	Organ Requests
1:00	LC	Traveling Tips
1:15	LC	Dance Music
1:30	RC	Your Request
1:45	RC	Your Request
2:00	LC	Quiz Quiz
2:15	LC	Quiz Quiz
2:30	LS	State Park Interviews
2:45	LS	What To Do
3:00	LC	Sports Recap
3:15	RC	Off the Record
3:30	RC	Off the Record
3:45	RC	Off the Record
4:00	LS	Civic Roundtable
4:15	LS	Civic Roundtable
4:30	RC	Music of Yesteryear
4:45	LS	St. Ignace History
5:00	LC	News
5:15	LS	Evening Devotions
5:30	LC	Dinner Music
5:45	LC	Dinner Music
6:00		Sign Off

## EXHIBIT #2

### STATEMENT OF POLICY

The request of all individuals, groups, or organizations for time to discuss public issues of a controversial nature shall be considered in the light of the contribution which their use of time would make to the public interest and toward a well balanced program structure. Each request will be considered solely on its individual merits without discrimination or prejudice toward any individual, group, or organization desiring such time.

The policy of the St. Ignace station on public issues of a controversial nature will be one of open-mindedness and impartiality. In connection with its own sustaining programs, the applicant will attempt at all times to give a fair representation to opposing sides of every controversial question which materially affects the life or welfare of any substantial group.

The St. Ignace station will not censor the opinion of speakers who have been given time on the air. It must, however, check for violations of the law and for inaccurate, defamatory and seditious statements, as the courts have held broadcasters responsible for damaging statements made over their facilities.

An illustration of a public issue program is the one presented by the Civic League of St. Ignace and is found in

the proposed log of Sunday, 10:45 to 11:00. This project is the beautifaction of St. Ignace. It is the gateway to the Upper Peninsula and as such acts as host to thousands of visitors entering the North each year. The city is soot laden because of the State Ferries' practice of cleaning their smoke stacks in the city harbor, violating the law which states that this should be done a considerable distance from the city. Consequently the city is continually covered with soot, flowers fail to grow, homes are dingy, and clothes hung out on washdays are covered with soot. This problem also persists in Mackinac Island and Mackinaw City. The Health Department of St. Ignace will also discuss this subject on the program, Health Notes, to be aired Sundays 11:45 to 12:00. Here the problem of soot is approached as a menace to the health of the populace.

These two programs are scheduled because the problem discussed affects the entire community and therefore has universal appeal. If this matter can be brought to the attention of others outside the community there is a great possibility of enforcing this law.

### EXHIBIT #3

#### GENERAL PLANS FOR STAFFING THE STATION

TOTAL ON PAYROLL 12

#### DEPARTMENT & PERSONNEL

#### DUTIES

#### Executive Department General Manager

Also sales manager; real program manager; public service.

#### Program Department Program Manager

Routine programming; also women's director; public service; write commercials. Also receptionist; secretary; bill clerk.

Traffic Manager

Assistant Traffic  
Manager

Also receptionist; stenographer.

Announcer A

Also service accounts; have 1st. class ticket.

Announcer B

Also service accounts; have 1st. class ticket.

Announcer C

Also service accounts; have 1st. class ticket.

Announcer D

Also service accounts; announce 9 hours weekly.

Announcer E

Also service accounts; announce 35 hours weekly; music librarian.

Announcer F

Also service accounts; have 1st. class ticket.

#### Technical Department Chief Engineer (Announcer D)

Work 50 hours weekly; do all maintenance; will not stand watch.

Assistant Chief  
Engineer  
(Announcer E)

Work 44 hours weekly; assist in maintenance if necessary.

Apprentice A  
Apprentice B

#### Sales Department General manager All Announcers



May 31 '50

ROOM USE ONLY

Jul 6 '50 *ph*

Jul 22 '50

Dec 1 '50 *ph*

Oct 28 '52

Nov 13 '52

Dec 1 '52

Feb 16 '54

Dec 1 '58

Jan 8 '59

MAR 2 '59

8 Apr 59

~~FEB 8 1961~~

*2/2/61*

~~MAR 2 1961~~

~~DEC 1 1966~~

~~DEC 1 1966~~

~~DEC 1 1966~~

~~FEB 7 1967~~

ROOM USE ONLY





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