

# **NRSC-2 MEASUREMENTS REPORT**

# **KGTO-AM**

## ***1050 KHZ***

PREPARED BY: Normand R. Laramée

SURVEY CONDUCTED ON: 10/14/2023

To demonstrate compliance with FCC RULE 73.1590,  
“EQUIPMENT PERFORMANCE MEASUREMENTS”,

as detailed in FCC RULE 73.44,  
“AM TRANSMISSION SYSTEM EMISSION LIMITATIONS”.

# INDEX

- 1) Technical Qualifications
- 2) Test Procedure
- 3) Test Equipment Setup
- 4) Site Log
- 5) Site Location Maps
- 6) Measured Emissions Graphs
- 7) Emissions Graphs Analysis
- 8) Modulation Info
- 9) Modulation Analysis
- 10) About Modulation

# TECHNICAL QUALIFICATIONS

Be it here known:

That NORMAND R. LARAMEE has been contracted to perform the measurements and report contained herein.

That he is experienced in the field of Broadcast Engineering and has performed this type of work on a professional basis in the capacities of Chief Engineer, Contract Engineer, and Consultant.

That he has held an FCC First-Class Radiotelephone license since 1981.

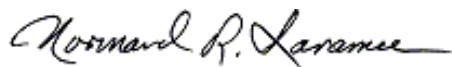
That he currently holds an FCC General Radiotelephone Operator License PG-10-14519 issued January 2, 1985.

That he is currently an active member of the Society of Broadcast Engineers.

That his work is a matter of record with the Federal Communications Commission.

Be it further attested that the information contained within this report is true and factual to the best of my knowledge.

Signed this 30th day of October, 2023.



Normand R. Laramee  
Normand R. Laramee

# TEST PROCEDURE

All tests were conducted using equipment suitable for this purpose and calibrated to internal standards prior to commencement of measurements.

Good engineering practices were observed during the course of the measurements and the results are believed to be accurate.

All tests were conducted in the field using a 2012 Nissan Xterra as a platform and its onboard battery to provide power for the test equipment.

The measurements were conducted at a sufficient distance from the center of the antenna system as necessary to provide enough RF input level to the analyzer to meet the resolution requirements for the stations licensed power level. Measurements were made using a suitable swept-frequency RF spectrum analyzer, employing a peak-hold duration of at least 10 minutes; with no video filtering and a 300 Hz resolution bandwidth as required by FCC rules. The tests were made employing a shielded directional-loop type antenna with an approximate diameter of 4 feet. The antenna was deployed at 10 ft. above ground elevation.

Tests were conducted with the station operating on the main transmitter, into the specified antenna system and output power set for normal operation. Normal program material and audio processing were employed.

Measurements were made at span settings of 50 kHz, 100 kHz, and 200 kHz to yield horizontal divisions of 5 kHz, 10 kHz, and 20 kHz as recommended by the NRSC Committee. The system employed a vertical graticule of 10dB per division, with a range greater than the required 80dB.

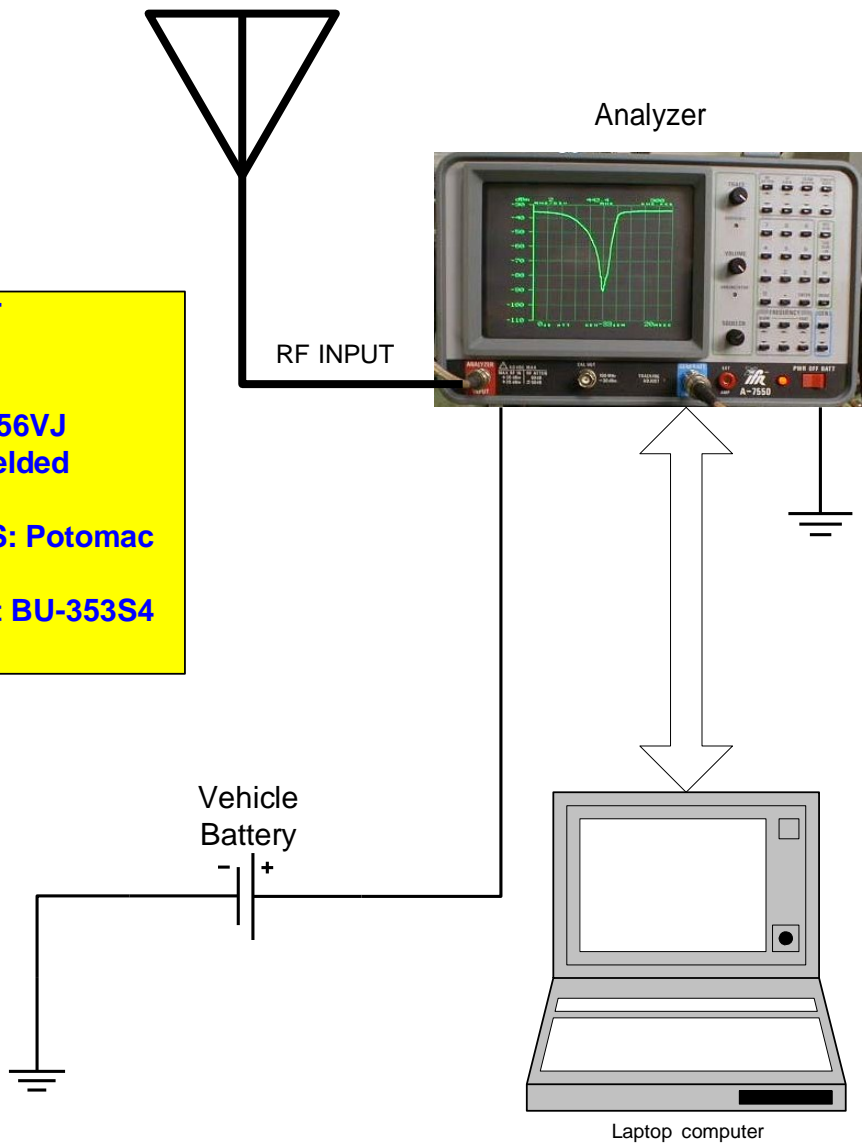
The results were printed graphically and are included as exhibits to demonstrate compliance. The hard copy printouts were marked to show FCC limits as specified in 73.44(b) a.k.a. the NRSC mask.

Measurements were also made with a Potomac Instruments FIM-41 at the second and third harmonic frequency and the results noted on the Site Log.

# TEST EQUIPMENT SETUP

## EQUIPMENT LIST

**ANALYZER:** IFR A-7550  
**COMPUTER:** ASUS Model: N56VJ  
**ANTENNA:** 4 ft. diameter shielded broadband loop  
**HARMONIC MEASUREMENTS:** Potomac Instruments FIM-41  
**GEOPOSITIONING:** GlobalSat BU-353S4 GPS Receiver



# SITE LOG

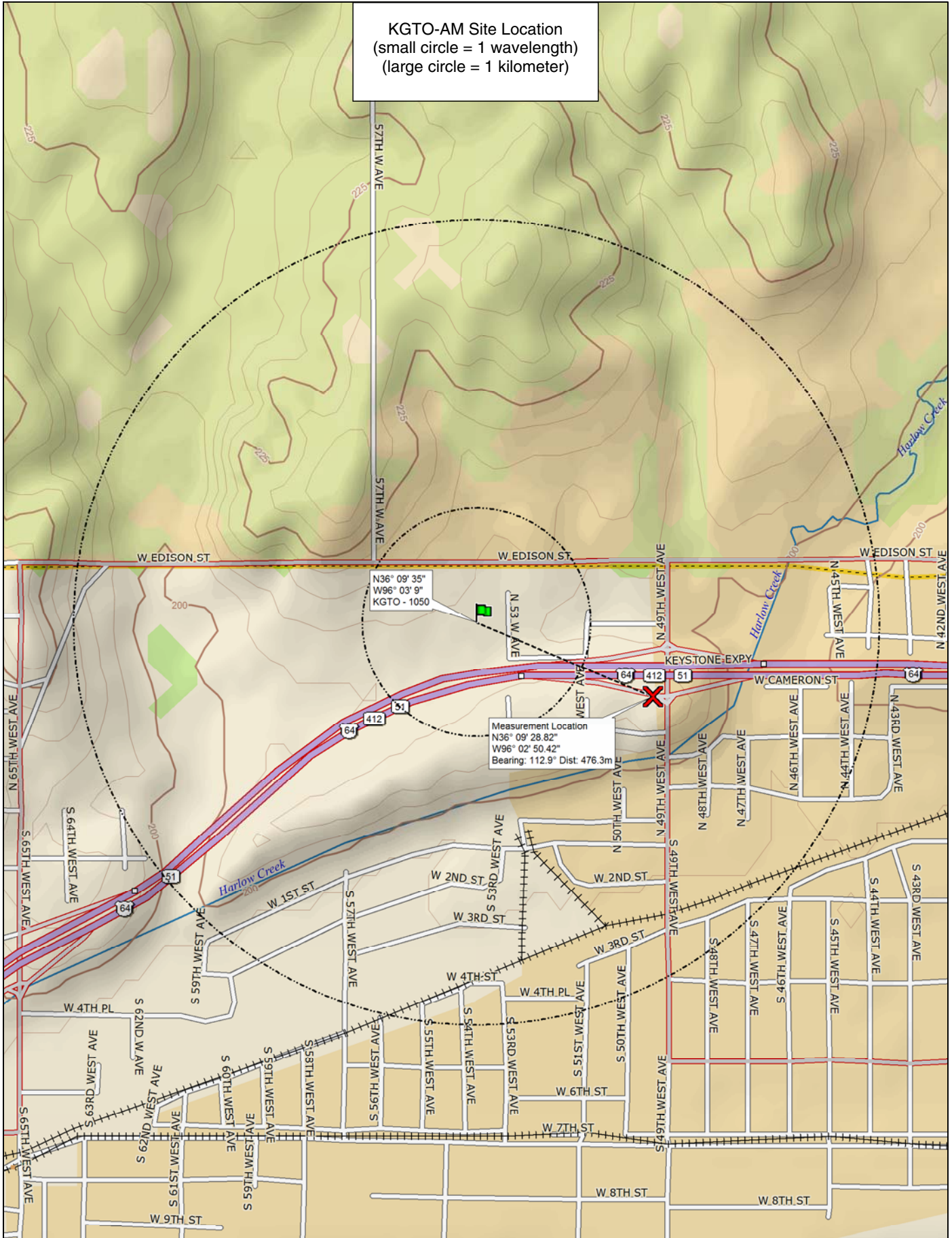
STATION: KGTO-AM  
CITY OF LICENSE: Tulsa, OK.  
FREQUENCY: 1050 kHz  
ANT. MODE/CLASS: ND2/D  
POWER D/N: 1000w /  
DATE MEASURED: 10/14/2023  
LOCATION: Approximately 476.3m ESE of the antenna, bearing 112.9° True on the S 49th W Ave. exit ramp of the Keystone Exp.  
(See site maps attached.)

EXHIBIT	TIME	SPAN	BANDWIDTH	REF. LEVEL
KGTO-1	12:27 12:37	50 kHz	300 Hz	-28.33 dBm
KGTO-2	12:17 12:27	100 kHz	300 Hz	-29 dBm
KGTO-3	12:07 12:17	200 kHz	300 Hz	-28 dBm

(All times listed are CDT)

HARMONICS	FREQ.	LEVEL BELOW CARRIER
Fundamental	1050 kHz	0 dB ref.
2 <sup>nd</sup> Harmonic	2100 kHz	-82db dB
3 <sup>rd</sup> Harmonic	3150 kHz	-77db dB

KGTO-AM Site Location  
(small circle = 1 wavelength)  
(large circle = 1 kilometer)



Data use subject to license.

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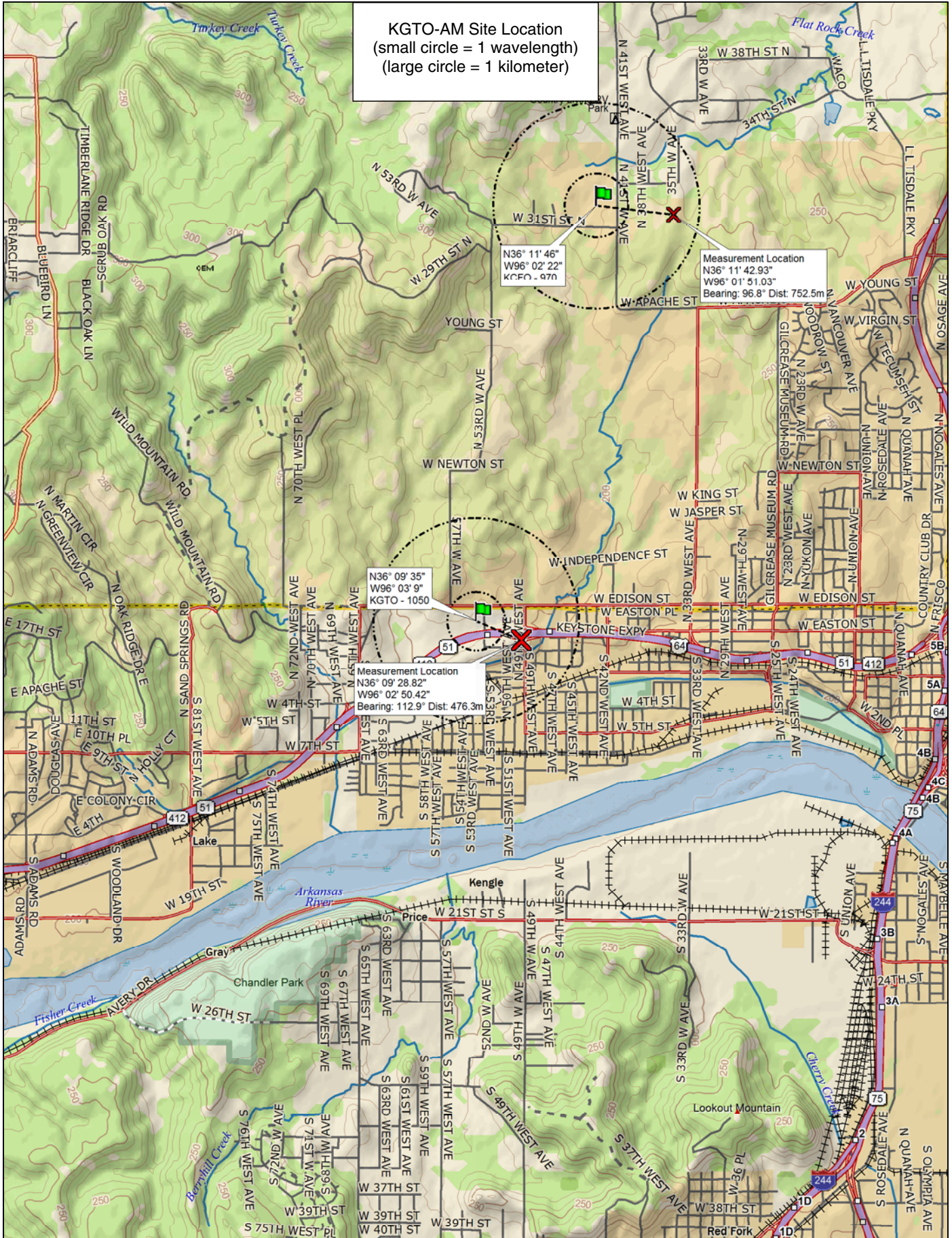
www.delorme.com



Scale 1 : 12,800



1 cm = 128.0 m Data Zoom 14-0



KGTO-AM Site Location  
 (small circle = 1 wavelength)  
 (large circle = 1 kilometer)

N36° 11' 46"  
 W96° 02' 22"  
 KFCO - 970

Measurement Location  
 N36° 11' 42.93"  
 W96° 01' 51.03"  
 Bearing: 96.8° Dist: 752.5m

N36° 09' 35"  
 W96° 03' 9"  
 KGTO - 1050

Measurement Location  
 N36° 09' 28.82"  
 W96° 02' 50.42"  
 Bearing: 112.9° Dist: 476.3m

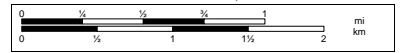
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Scale 1 : 50,000



1 cm = 500.0 m Data Zoom 12-0



# DIPRO Engineering Services

A-7550

5.0

1.05

300

KGTO-1

kHz/Div

MHz

Hz Res

10/14/2023 12:37:05

dBm

0

-10

-20

-30

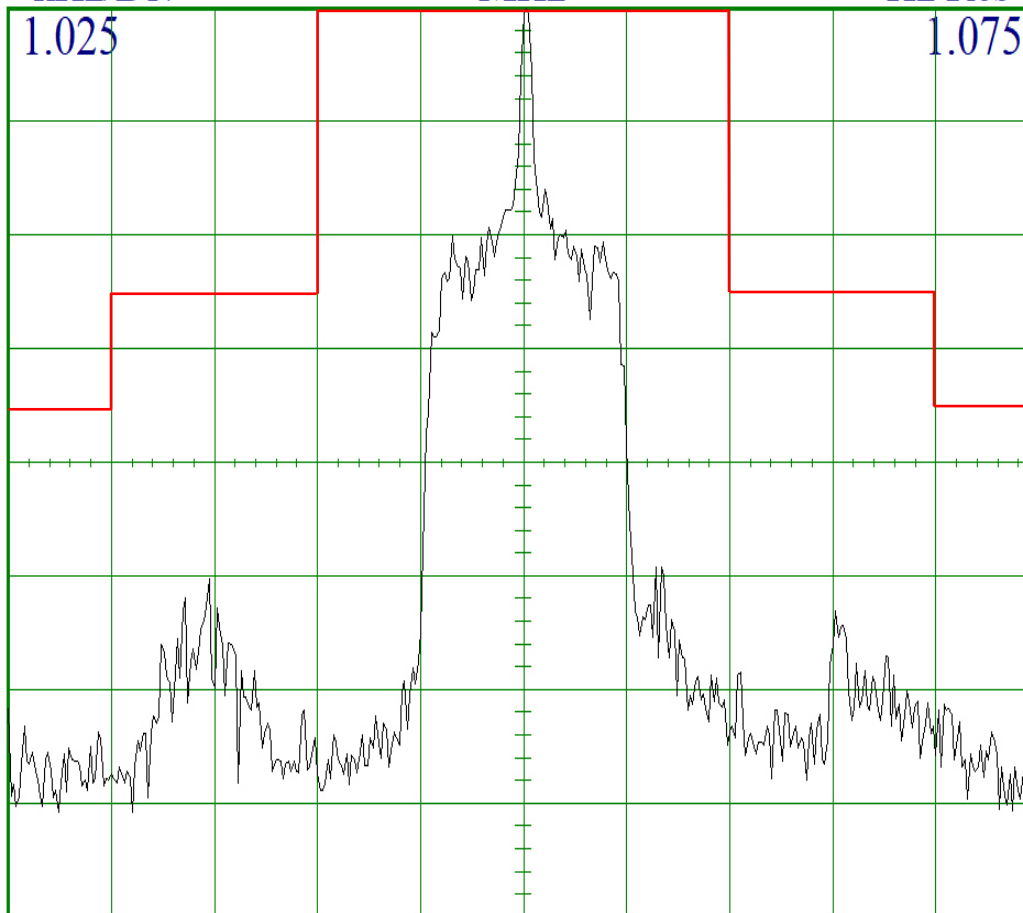
-40

-50

-60

-70

-80



Excerpt, FCC Rules Sec 73.44  
AM transmission system  
emission limitations.  
( NRSC Mask )

*“Emissions 10.2 kHz to 20 kHz removed from the carrier must be attenuated at least 25 dB below the unmodulated carrier level. Emissions 20 kHz to 30 kHz removed from the carrier must be attenuated at least 35 dB below the unmodulated carrier level.”*

10 dB Attn

Gen --- dBm

200 mSecs

10 dB IF Gain

Video Filter: 0 kHz

Peak Freq: 1.0502

Peak Level: -28.33

# DIPRO Engineering Services

A-7550

10.0

1.05

300

KGTO-2

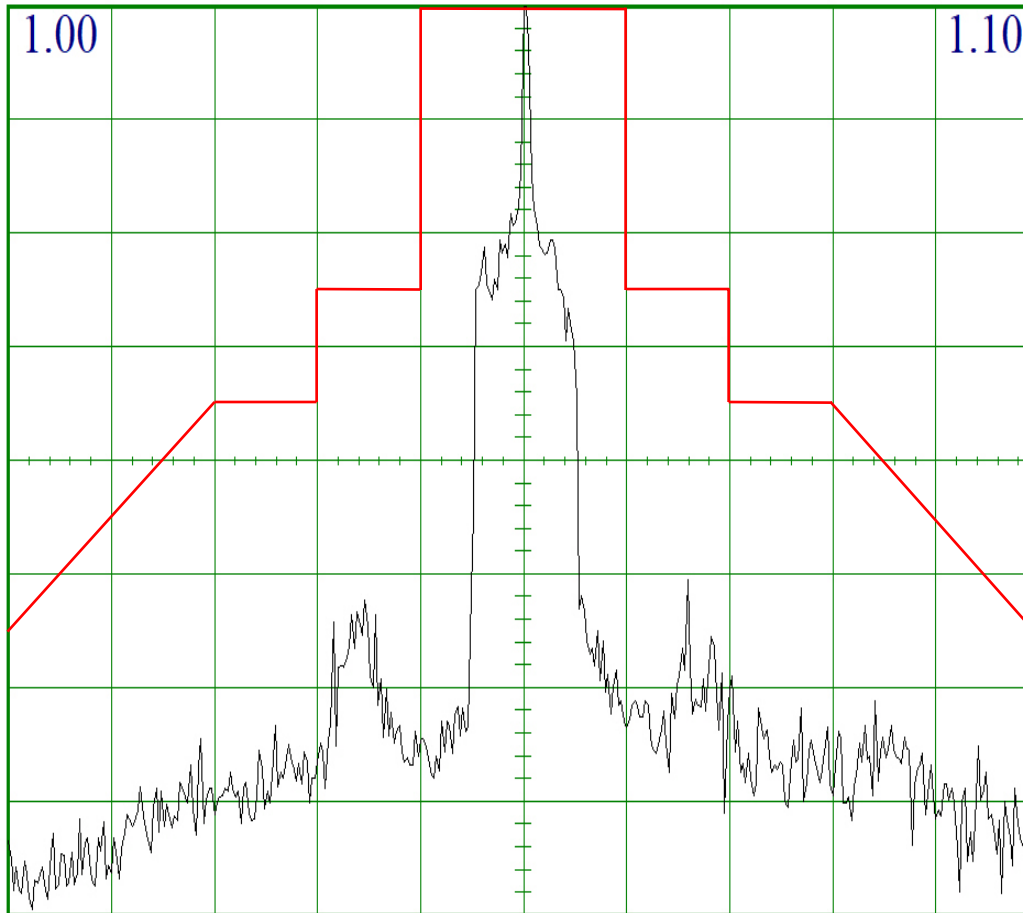
kHz/Div

MHz

Hz Res

10/14/2023 12:27:04

dBm  
0  
-10  
-20  
-30  
-40  
-50  
-60  
-70  
-80



Excerpt, FCC Rules Sec 73.44  
AM transmission system  
emission limitations.  
( NRSC Mask )

*“Emissions 10.2 kHz to 20 kHz removed from the carrier must be attenuated at least 25 dB below the unmodulated carrier level. Emissions 20 kHz to 30 kHz removed from the carrier must be attenuated at least 35 dB below the unmodulated carrier level. Emissions 30 kHz to 60 kHz removed from the carrier must be attenuated at least [5 + 1 dB/kHz] below the unmodulated carrier level.”*

10 dB Attn

Gen --- dBm

500 mSecs

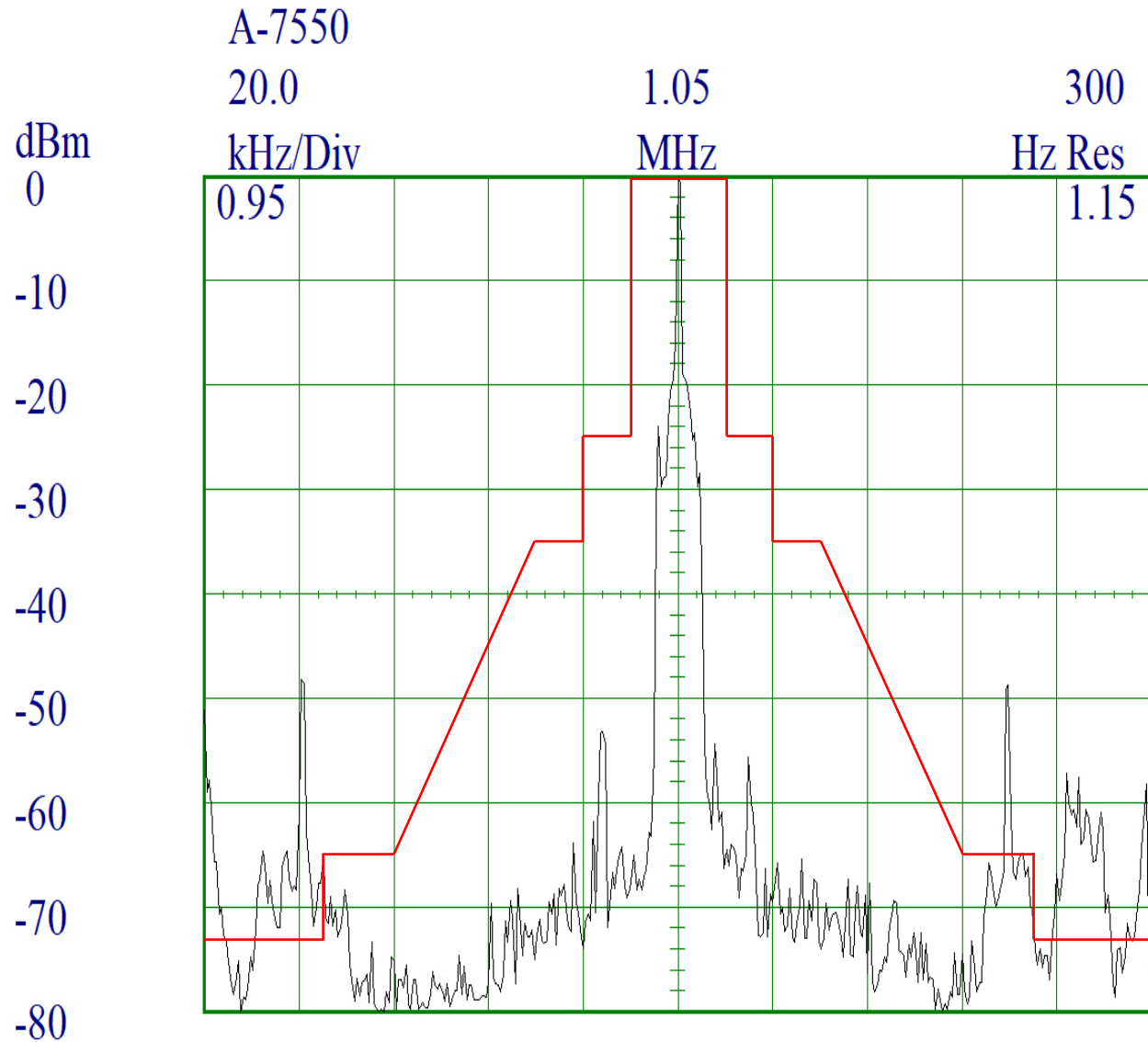
10 dB IF Gain

Video Filter: 0 kHz

Peak Freq: 1.0501

Peak Level: -29.

# DIPRO Engineering Services



KGTO-3

10/14/2023 12:17:04

Excerpt, FCC Rules Sec 73.44  
AM transmission system  
emission limitations.  
( NRSC Mask )

*“Emissions 10.2 kHz to 20 kHz removed from the carrier must be attenuated at least 25 dB below the unmodulated carrier level. Emissions 20 kHz to 30 kHz removed from the carrier must be attenuated at least 35 dB below the unmodulated carrier level. Emissions 30 kHz to 60 kHz removed from the carrier must be attenuated at least [5 + 1 dB/kHz] below the unmodulated carrier level. Emissions between 60 kHz and 75 kHz of the carrier frequency must be attenuated at least 65 dB below the unmodulated carrier level. Emissions removed by more than 75 kHz must be attenuated at least 43 + 10 Log (Power in watts) or 80 dB below the unmodulated carrier level, whichever is the lesser attenuation, except for transmitters having power less than 158 watts, where the attenuation must be at least 65 dB below carrier level.”*

10 dB Attn

Gen --- dBm

500 mSecs

10 dB IF Gain

Video Filter: 0 kHz

Peak Freq: 1.0503

Peak Level: -28.

# ANALYSIS

## **EXHIBIT KGTO-1:**

Shows the spectrum 25 kHz above and below the carrier frequency. (*“Emissions 10.2 kHz to 20 kHz removed from the carrier must be attenuated at least 25 dB below the unmodulated carrier level. Emissions 20 kHz to 30 kHz removed from the carrier must be attenuated at least 35 dB below the unmodulated carrier level.”*)

Narrow band performance is within acceptable limits.

## **EXHIBIT KGTO-2:**

Shows the spectrum 50 kHz above and below the carrier frequency. (In addition to the above: *“Emissions 30 kHz to 60 kHz removed from the carrier must be attenuated at least  $[5 + 1 \text{ dB/kHz}]$  below the unmodulated carrier level.”*)

Mid band performance is within acceptable limits.

## **EXHIBIT KGTO-3:**

Shows the spectrum 100 kHz above and below the carrier frequency and indicates the full NRSC mask which additionally requires that emissions 60 kHz to 75 kHz removed from the carrier be at least 65 dB below the carrier. (In addition to all of the above: *“Emissions between 60 kHz and 75 kHz of the carrier frequency must be attenuated at least 65 dB below the unmodulated carrier level. Emissions removed by more than 75 kHz must be attenuated at least  $43 + 10 \text{ Log (Power in watts)}$  or 80 dB below the unmodulated carrier level, whichever is the lesser attenuation, except for transmitters having power less than 158 watts, where the attenuation must be at least 65 dB below carrier level.”*)

In this case, at 1000w, emissions removed by more than 75 kHz must be attenuated at least -73db below the carrier level.

Spurious emissions of the KGTO carrier were observed at 950 kHz and 1150 kHz. The spurious emission from 1130-1140 kHz is a mix of 1050 kHz and 970 kHz.

Wide band performance is **NOT** within acceptable limits.

## **CONCLUSION:**

The measurement results confirm that KGTO emissions are **NOT** within NRSC limits.

Harmonic measurements confirmed that the emissions at the second and third harmonic are less than the required -73db below the carrier and therefore in compliance.

It is believed that KGTO is **NOT** in full compliance with FCC 73.44.

**NOTE:** KGTO is operating at a restricted bandwidth of 5 kHz.

# MODULATION INFO

STATION:	KGTO-AM
Date Measured:	10/14/2023
Positive Peak/Avg Mod:	97%
Negative Peak/Avg Mod:	-85%
Absolute Legal Limits:	+125% / -100%

(See the full **KGTO** modulation analysis on the next page.)

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## MODULATION - GENERAL TECHNICAL NOTES

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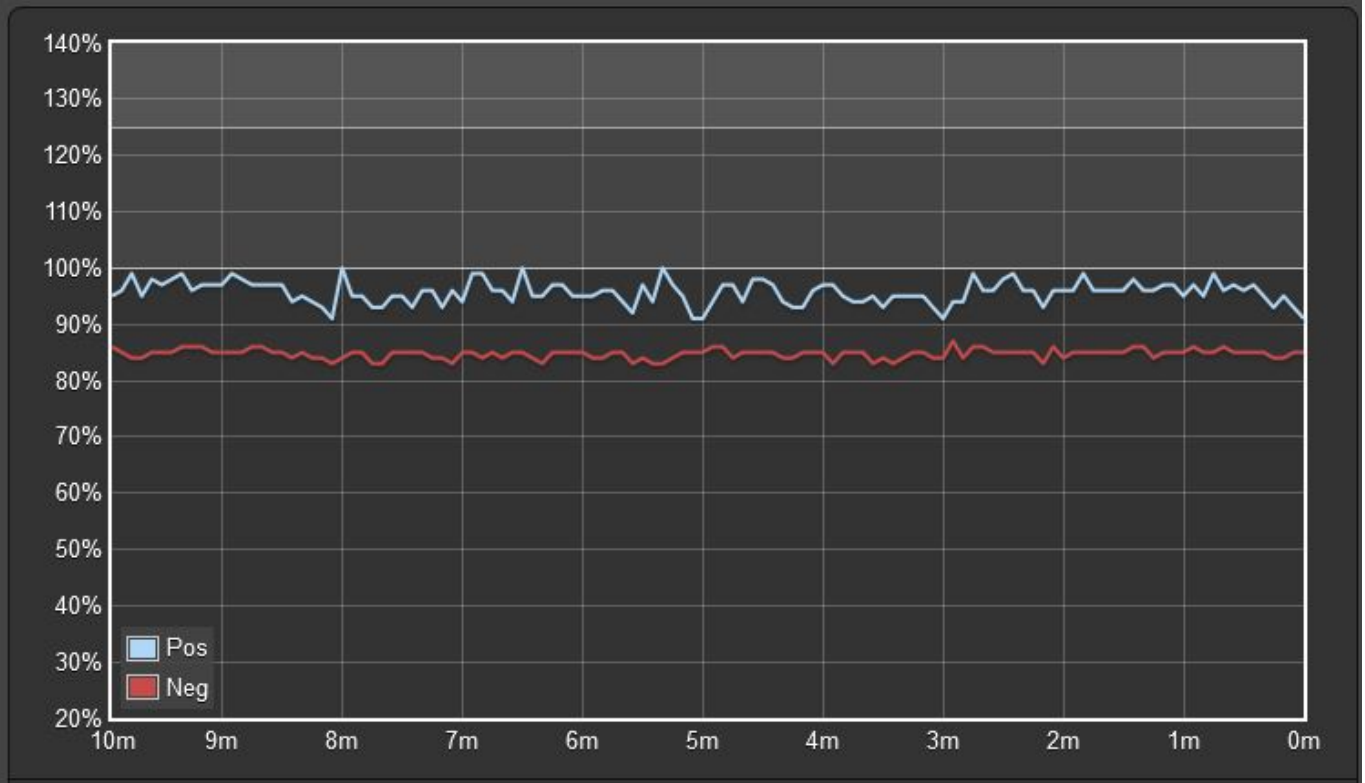
- ◆ Most transmitters and audio processors today are capable of asymmetrical modulation. Legal limits are 125% positive peak and 100% negative peak modulation. Technically it is not possible to modulate more than -100% since it would result in a 100% reduction of the carrier (no signal). It is usually best practice to shoot for about -97% and never hit minus 100%. Depending on the transmitter and antenna system, all kinds of distortive effects usually result beyond -100%.
- ◆ It's ok to modulate evenly at 100% positive & negative. But to do so means losing potential coverage since full non-symmetrical modulation will increase your output power 1.5 times.
- ◆ 125% is the absolute legal limit for positive modulation. Most stations shoot for 120% or so and leave a little headroom so they don't exceed 125%. Going beyond 125% can generate some serious spurious signals above and below your licensed frequency with some transmitters. This could cause some interference to other stations, and possibly a hefty fine if the FCC were to discover it.
- ◆ Special attention should be paid to making sure that the wiring between the output of the peak limiter and the input of the transmitter is properly polarized. If the positive and negative wire connections are reversed you will never do better than an even 100% positive/negative modulation. Any attempt at that point to modulate non-symmetrically will only get you increasingly less and less positive modulation relative to the negative. I have seen a number of stations operating in this manner and when possible, have helped them correct the situation.

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*Note: FCC rules do not require modulation measurements as part of NRSC compliance.  
The data presented here is for informational purposes only.*

# MODULATION ANALYSIS

## Meter History - KGTO Modulation



### COMMENTARY:

- Positive Peak Levels - Acceptable but below normal.
- Negative Peak Levels - Acceptable.
- Dynamic Range - Minimal.
- Compression - Moderate to high.
- Polarity - Normal

# ABOUT MODULATION

Modulation levels oftentimes can have negative effects on the outcome of the required annual NRSC measurements. The FCC rules contain very specific limits regarding the modulation levels of AM & FM stations. Interestingly though, the rules for AM NRSC measurements do not contain requirements for checking modulation levels. In my past travels I have discovered that a sizable number of my client stations were not passing the NRSC measurements due to spurious emissions being generated beyond their licensed frequencies. Ultimately, after careful measurements with precision test equipment, I determined that some of the NRSC measurement failures were being caused by **excessive** modulation.

In a continuing effort to find ways to enhance and bring added value to the services that I provide to my clients, I include a modulation level check and analysis for each of my clients stations. **The modulation analysis report includes a graphical display of a 10- minute segment of on-air audio at the time of measurement. There is much useful information that can be derived from this analysis including peak modulation, average modulation, dynamic range, modulation density, etc.** There is **no additional charge** for this service.

In addition to enabling a more complete understanding of the NRSC measurement data for each station, there are other benefits to be derived by knowing exactly what's going on with your modulation. **Over modulation** has been shown to produce some rather nasty audible side effects, and potential interference to other stations. On the other hand, **under modulation** can cost you coverage, listeners, and ultimately revenue. I have discovered that many stations are over modulated and surprisingly, a near equal percentage of stations that are under modulated, some severely.

If you don't know this already, AM modulation translates into power. A fully legally modulated transmitter will emit up to 1.5 times its licensed power. If you are not utilizing that power, you are not reaching out as far as you could otherwise. Audio processing density is also another important factor to consider. Suffice it to say that I have found many stations that are at a coverage disadvantage simply because they are poorly processed. For all of my clients, I include measurements for modulation and follow-up analysis with each annual NRSC report.

If you would like to discuss this (or any other) matter and possible solutions in greater detail, I can be reached at any time at (918) 521-8693. Additional information, including a list of the other services that I provide, please go to my web site:

**[www.diproservices.com](http://www.diproservices.com)**

Norm Laramée