



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000

www.wileyrein.com

Stamp and Return

August 18, 2017

Mark Lipp  
202.719.7503  
mlipp@wileyrein.com

**VIA MESSENGER**

ACCEPTED/FILED

AUG 18 2017

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Attention: Media Bureau**

Re: **Application for Direct Measurement of Power  
on FCC Form 302-AM**  
Commonwealth Radio, LLC  
Station WNIS(AM), Norfolk, Virginia  
Facility Identifier Number 4671

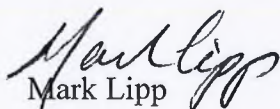
Dear Ms. Dortch:

Transmitted herewith on behalf of Commonwealth Radio, LLC, the licensee of Station WNIS(AM) identified above, are an original and two copies of its application to return to using the direct method of measuring power following adjustment of its directional array. Further, this Form 302-AM reports a slight correction of the center of array geographic coordinates, which the Rules indicate can be accomplished in this application.

There is no associated application filing fee, since this Form 302-AM informs the Commission of the licensee's return to measuring power using the direct method.

If there are any questions about this Application, please contact undersigned counsel for Commonwealth Radio, LLC.

Sincerely,

  
Mark Lipp

Enclosure

FOR  
FCC  
USE  
ONLY

**FCC 302-AM**  
**APPLICATION FOR AM**  
**BROADCAST STATION LICENSE**

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

**SECTION I - APPLICANT FEE INFORMATION**

1. PAYOR NAME (Last, First, Middle Initial)

Commonwealth Radio, LLC

MAILING ADDRESS (Line 1) (Maximum 35 characters)

500 Dominion Tower

MAILING ADDRESS (Line 2) (Maximum 35 characters)

999 Waterside Drive

CITY

Norfolk

STATE OR COUNTRY (if foreign address)

Virginia

ZIP CODE

23510

TELEPHONE NUMBER (include area code)

757.640.8500

CALL LETTERS

WNIS(AM)

OTHER FCC IDENTIFIER (If applicable)

4671

2. A. Is a fee submitted with this application?

☐

Yes

☒

No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

☐

Governmental Entity

☐

Noncommercial educational licensee

☒

Other (Please explain): **Application  
for Direct Measurement of Power**

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)

FEE TYPE CODE		

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$

FOR FCC USE ONLY

--

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)

--	--	--

(B)

0	0	0	1
---	---	---	---

(C)

\$
----

FOR FCC USE ONLY

--

ADD ALL AMOUNTS SHOWN IN COLUMN C,  
AND ENTER THE TOTAL HERE.  
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED  
REMITTANCE.

TOTAL AMOUNT  
REMITTED WITH THIS  
APPLICATION

\$
----

FOR FCC USE ONLY

--

<b>SECTION II - APPLICANT INFORMATION</b>		
1. NAME OF APPLICANT Commonwealth Radio, LLC		
MAILING ADDRESS 500 Dominion Tower, 999 Waterside Drive		
CITY Norfolk	STATE Virginia	ZIP CODE 23510

2. This application is for:

☒ Commercial ☐ Noncommercial

☒ AM Directional ☐ AM Non-Directional

Call letters WNIS(AM)	Community of License Norfolk, VA	Construction Permit File No. N/A	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
--------------------------	-------------------------------------	-------------------------------------	---	---

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

☐ Yes ☐ No

If No, explain in an Exhibit.

Exhibit No.  
N/A

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

☐ Yes ☐ No

If No, state exceptions in an Exhibit.

Exhibit No.  
N/A

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

☐ Yes ☐ No

If Yes, explain in an Exhibit.

Exhibit No.  
N/A

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

☐ Yes ☐ No

If No, explain in an Exhibit.

☒ Does not apply

Exhibit No.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☒ No

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

Exhibit No.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

☐ Yes ☒ No

If Yes, provide particulars as an Exhibit.

Exhibit No.

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

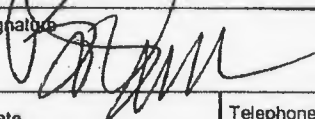
The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

#### CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

☒ Yes ☐ No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name Robert L. Sinclair	Signature 	
Title Managing Member	Date 08/17/2017	Telephone Number 757.640.8500

#### WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

#### FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

# GRAHAM BROCK, INC.

---

BROADCAST TECHNICAL CONSULTANTS

APPLICATION FOR STATION LICENSE  
DIRECT MEASUREMENT OF POWER  
COMMONWEALTH RADIO, LLC  
WNIS AM RADIO STATION  
790 kHz - 5.0 kW - DA1  
NORFOLK, VIRGINIA  
August 2017

TECHNICAL EXHIBIT

*Copyright 2017*

**SECTION III - LICENSE APPLICATION ENGINEERING DATA**

Name of Applicant

Commonwealth Radio, LLC

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

☐ Station License

☒ Direct Measurement of Power

**1. Facilities authorized in construction permit**

Call Sign	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation	Power in kilowatts	
WNIS	N/A	790	U	Night 5.0	Day 5.0

**2. Station location**

State	City or Town
Virginia	Norfolk

**3. Transmitter location**

State	County	City or Town	Street address (or other identification)
VA	Hampton (consolidated w/ city)	Hampton	Hall Road

**4. Main studio location**

State	County	City or Town	Street address (or other identification)
VA	Norfolk (consolidates w/ city)	Norfolk	999 Waterside Dr., Ste. 500

**5. Remote control point location (specify only if authorized directional antenna)**

State	County	City or Town	Street address (or other identification)
VA	Norfolk	Norfolk	999 Waterside Dr., Ste. 500

6. Has type-approved stereo generating equipment been installed?

☒ Yes ☐ No

7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?

☒ Yes ☐ No

☐ Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.

Exhibit No.

**8. Operating constants:**

RF common point or antenna current (in amperes) without modulation for night system 10.4	RF common point or antenna current (in amperes) without modulation for day system 10.4
Measured antenna or common point resistance (in ohms) at operating frequency Night 50.0 Day 50.0	Measured antenna or common point reactance (in ohms) at operating frequency Night 0.0 Day 0.0

**Antenna indications for directional operation**

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day
Twr #1 (SW)	0.0	0.0	100.0	100.0		
Twr #2 (SWC)	+164.1	+164.1	97.0	97.0		
Twr #3 (NE C)	+30.5	+30.5	41.3	41.3		
Twr #4 (NE)	-142.5	-142.5	110.6	110.6		

Manufacturer and type of antenna monitor:

Potomac AM-19D (210)



## SECTION III - Page 2

9. Description of antenna system (If directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lighting)	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
Uniform cross section guyed steel tower	151.9 (All Towers)	#1 153.3 #3 153.1 #2 153.4 #4 153.3	#1 153.3 #3 153.1 #2 153.4 #4 153.3	Exhibit No.

Excitation



Series



Shunt

## Antenna Structure Registration Numbers

#1 1035307 #3 1035309

#2 1035308 #4 1035310

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	37 °	04 '	24 "	West Longitude	76 °	17 '	33 "
----------------	------	------	------	----------------	------	------	------

If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

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

Exhibit No.

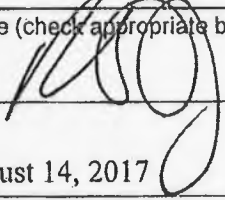
10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

Slight correction of center of array coordinates

11. Give reasons for the change in antenna or common point resistance.

None.

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type)	Signature (check appropriate box below)
R. Stuart Graham	
Address (include ZIP Code)	Date
Graham Brock, Inc. P. O. Box 24466 St. Simons Island	August 14, 2017
	Telephone No. (Include Area Code)
	912-638-8028

☐ Technical Director☐ Registered Professional Engineer☐ Chief Operator☒ Technical Consultant☐ Other (specify)

**APPLICATION FOR STATION LICENSE**  
**DIRECT MEASUREMENT OF POWER**  
**COMMONWEALTH RADIO, LLC**  
**WNIS AM RADIO STATION**  
**790 kHz - 5.0 kW - DA1**  
**NORFOLK, VIRGINIA**  
**August 2017**

This application is prepared on behalf of Commonwealth Radio, LLC, licensee of AM radio station WNIS, 850 kHz, Norfolk, Virginia. This application is to return WNIS to a direct measurement of power and specifies the operating parameters. This application is necessary following the adjustment of the directional array after an inspection and repairs to Tower 2 of the directional array. In addition, there is a slight correction to the WNIS center of array geographic coordinates. The licensed coordinates are (NAD '27) North Latitude 37° 04' **25"** and West Longitude 76° 17' **31"**. The corrected coordinates are (NAD '27) North Latitude 37° 04' **24"** and West Longitude: 76° 17' **33"**. Since this correction of 1 second of latitude and 2 seconds of longitude is 3 seconds of latitude and/or longitude, it is appropriate to make this correction with this application.

A partial proof of performance, following the guidelines outlined in MM Docket No. 93-177, adopted February 14, 2001, was conducted. The daytime partial proof of performance utilized four monitor point radials from the latest proof of performance to verify operation of the directional array (Exhibit 1). The last full proof was conducted October 1984.

As noted in the enclosed measurement data, the array appears to be adjusted within the limitations of the station's original authorization and within the radiation limits set forth in the 1984 Proof of Performance.



We have tried to be as accurate as possible in the preparation of this application. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone at 912-638-8028 or by e-mail at [rsg@grahambrock.com](mailto:rsg@grahambrock.com).

WNIS - 39° Radial - DIRECTIONAL

Point #	Distance Km	Mi	Original ('84) FI	New FI	M.P. MAX	Date	24 hour Time	Ratio Arithmetic	Log
1	0.93	0.58	47.500	42.50	63.000	7/10/2017	11:54	0.895	-0.048
2	2.61	1.62	12.900	16.00		7/10/2017	12:39	1.240	0.094
10	44.98	27.95	1.050	0.58		7/11/2017	16:42	0.552	-0.258
11	45.11	28.03	1.020	0.50		7/11/2017	16:58	0.490	-0.310
12	47.36	29.43	1.000	0.44		7/11/2017	17:03	0.440	-0.357
13	48.38	30.06	0.940	0.48		7/11/2017	17:08	0.511	-0.292
14	50.49	31.37	0.730	0.32		7/11/2017	17:21	0.438	-0.358
15	52.01	32.32	0.740	0.53		7/11/2017	17:26	0.716	-0.145
16	53.54	33.27	0.520	0.32		7/11/2017	17:30	0.615	-0.211

\* - Monitor Point

Arithmetic Ratio 0.655  
Log Ratio 0.617

1984 DA Field 36 mV/m/mi 57.94 mV/m/km  
Std Pattern Field 61.71  
Measured Field 37.97

WNIS - 70° Radial - Non-Directional/Directional

Point #	Distance Km	Mi	Original FI	New FI	M.P. MAX	Date	24 hour Time	Ratio Arithmetic	Log
1	1.24	0.77	125.000	65.00		7/10/2017	12:06	0.520	-0.284
2	1.40	0.87	128.000	91.00	209.570	7/10/2017	11:46	0.711	-0.148
# a	29.23	18.16	5.500	5.20		7/11/2017	14:47	0.945	-0.024
# b	29.35	18.24	5.700	5.30		7/11/2017	14:58	0.930	-0.032
# c	29.55	18.36	5.000	4.90		7/11/2017	15:04	0.980	-0.009
12	29.97	18.62	5.550	4.70		7/11/2017	15:17	0.847	-0.072
13	30.48	18.94	5.000	4.50		7/11/2017	14:17	0.900	-0.046
14	30.80	19.14	4.300	4.40		7/11/2017	16:02	1.023	0.010
# d	33.07	20.55	3.550	3.25		7/11/2017	16:14	0.915	-0.038

\* - Monitor Point

Arithmetic Ratio 0.857  
Log Ratio 0.840

# - New Measurement Point from 2010 Partial Proof

1984 DA Field 120 mV/m/mi 193.12 mV/m/km  
Std Pattern Field 310.16  
DA Measured Field 165.51

**EXHIBIT #1**

WNIS - 265.5° Radial - DIRECTIONAL

Point #	Distance Km	Mi	Original ('84) FI	New FI	M.P. MAX	Date	24 hour Time	Ratio Arithmetic	Log
8	3.49	2.17	73.500	64.00		7/10/2017	14:24	0.871	-0.060
9	3.81	2.37	66.000	59.00		7/10/2017	14:20	0.894	-0.049
10	3.88	2.41	70.000	55.00		7/10/2017	14:17	0.786	-0.105
11	4.06	2.52	61.500	54.00	69.700	7/10/2017	14:12	0.878	-0.056
15	7.53	4.68	35.000	30.00		7/10/2017	14:40	0.857	-0.067
16	7.82	4.86	34.700	28.50		7/10/2017	14:43	0.821	-0.085
17	7.92	4.92	32.600	27.00		7/10/2017	14:46	0.828	-0.082
18	8.00	4.97	30.500	26.50		7/10/2017	14:55	0.869	-0.061

\* - Monitor Point

Arithmetic Ratio 0.850  
Log Ratio 0.850

1984 DA Field 160 mV/m/mi 257.50 mV/m/km  
Std Pattern Field 288.36  
Measured Field 219.00

WNIS - 353° Radial - DIRECTIONAL

Point #	Distance Km	Mi	Original ('84) FI	New FI	M.P. MAX	Date	24 hour Time	Ratio Arithmetic	Log
7	2.56	1.59	24.500	22.00	56.000	7/10/2017	11:59	0.898	-0.047
8	32.46	20.17	1.540	0.62		7/10/2017	17:11	0.403	-0.395
9	33.07	20.55	1.380	0.75		7/10/2017	17:04	0.543	-0.265
10	37.13	23.07	0.860	0.65		7/10/2017	16:53	0.756	-0.122
13	38.80	24.11	0.950	0.75		7/10/2017	16:24	0.789	-0.103
14	39.06	24.27	0.785	0.72		7/10/2017	16:29	0.917	-0.038
15	39.59	24.60	0.710	0.55		7/10/2017	16:19	0.775	-0.111
16	40.22	24.99	0.775	0.38		7/10/2017	16:10	0.484	-0.315

\* - Monitor Point

Arithmetic Ratio 0.696  
Log Ratio 0.669

1984 DA Field 32 mV/m/mi 51.50 mV/m/km  
Std Pattern Field 71.71  
Measured Field 35.82

APPLICATION FOR STATION LICENSE  
DIRECT MEASUREMENT OF POWER  
COMMONWEALTH RADIO, LLC  
WNIS AM RADIO STATION  
790 kHz - 5.0 kW - DA1  
NORFOLK, VIRGINIA  
August 2017

EXHIBIT #2

NADCON

North American Datum Conversion

NAD 83 to NAD 27

NADCON Program Version 2.11

=====

Transformation #: 1      Region: Conus

	Latitude	Longitude
NAD 27 datum values:	37 04 24.33834	76 17 33.33004
NAD 83 datum values:	37 04 24.86000	76 17 32.12000
NAD 27 - NAD 83 shift values:	-0.52166	1.21004(secs.)
	-16.082	29.890 (meters)
Magnitude of total shift:		33.942(meters)

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

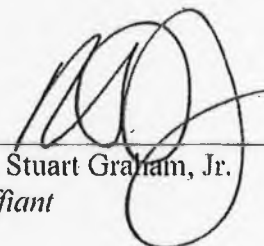
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**R. STUART GRAHAM**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Commonwealth Radio, LLC to prepare the attached Technical Exhibit.

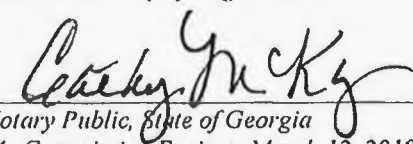
His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 14th day of August 2017.*

  
\_\_\_\_\_  
R. Stuart Graham, Jr.  
*Affiant*

*Sworn to and subscribed before me  
this the 14th day of August 2017*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: March 12, 2019