

Cohen, Dippell and Everist, P.C.

Before The  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Information Collections Being	)	OMB Control No. 3060-0506
Reviewed by the Federal	)	FM Station License Application
Communications Commission	)	FCC Form 2100, Schedule 302-FM
	)	
Paperwork Reduction Act of 1995 (PRA)	)	

Comments  
on Behalf of  
**COHEN, DIPPELL AND EVERIST, P.C.**

INTRODUCTION

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Notice and Request for Comments, released in the Federal Register, June 13, 2022 by the Commission. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and has performed professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over sixty (60) years.

In the Federal Register dated June 13, 2022<sup>1</sup>, Notice and Request for Comments appears to apply mostly to LPFM, however, on Page 773 the following paragraph is abstracted:

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<sup>1</sup>35772 Federal Register / Vol. 87, No. 113 / Monday, June 13, 2022 / Notices

"Requires that, the first time the directional pattern of a particular model of antenna is verified using computer results, the broadcast station must submit to the Commission both the results of the computer modeling and the measurements of either a full-size or scale model of the antenna or elements thereof, demonstrating a reasonable correlation between the measurements achieved and the computer model results. Once a particular antenna model or series of elements has been verified, subsequent applicants using the same antenna model number or elements and the same modeling software may cross reference the original submission by providing the application file number."

Clarification is requested if this paragraph is applicable to apply for the FM directional antenna(s) designed for the full-service commercial and/or the educational band.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.



Donald G. Everist  
President

Date: August 11, 2022