

**ENGINEERING SPECIAL TEMPORARY AUTHORITY  
KDOA-LP VANCOUVER, WASHINGTON  
CHANNEL 248, FACILITY ID 196313**

Licensee Rusting Sprocket Art ("RSA") here within requests an Engineering STA for operation at a temporary broadcast site to continue serving its community due to limiting circumstances outside of its control. RSA believes there is good cause to grant a temporary facility and that maintaining the license of KDOA-LP is in the public interest.

An Engineering STA request is concurrently being filed with a request from KDOA-LP, which shares a licensed broadcast antenna space with KOUV-LP.

**BACKGROUND**

Station was licensed to serve the population of Vancouver, Washington. Facility originally was constrained to licensing in a rural area outside the city of Vancouver due to minimum spacing rules and a dearth of available LPFM channels. There was difficulty procuring internet access and there was no direct path for STL for its current licensed site. Hence, KDOA-LP proposed utilizing a new site via MOD 0000108347, co-locating with KOUV-LP. Construction was delayed in March 2020 due to the onset of coronavirus (commencement of stay-at-home orders). Silent STA was granted. When it appeared coronavirus had not subsided within less than a year of the STA grant, the antenna site owners at the CP site backed-out of offering the site. MOD 0000135909 was then submitted to move to another site, which was granted 02/11/2021. RSA was scheduled to install new antennas on a tall tree proposed at the new site two weeks ago. In the last two weeks, extreme weather has wreaked havoc on the Portland-area vicinity. Snow and ice storms have downed trees, wiped out power, and impaired communications infrastructure. The weather, for which it is still raining, has made it impossible to complete the construction of MOD 0000135909. The climber scheduled to install the antenna indicated they cannot perform the installation due to safety reasons until the weather improves. With Silent STA soon to expire (March 8, 2021), the licensee is requesting Engineering STA to return to air. The requested commencement date for the Engineering STA is March 5, 2021.

**REQUEST OF TEMPORARY OPERATIONS**

RSA believes the aforementioned situation constitutes extraordinary circumstances beyond the control of the licensee, permitting restoration or relocation of existing facilities to continue communication service, which is consistent with 47 C.F.R. § 1.913. RSA requests an Engineering STA to co-locate at the KIEV-LP site until the weather improves. The signals of KDOA-LP and KOUV-LP will be starpoint-combined onto an antenna. The proposed site is very close to the construction permit site and meet the four-pronged prerequisite for a site (i.e., site loss was beyond the control of licensee, the

service continues programming to the community of license, the temporary site is the closest site found, and the temporary site does not involve the construction of a tower).

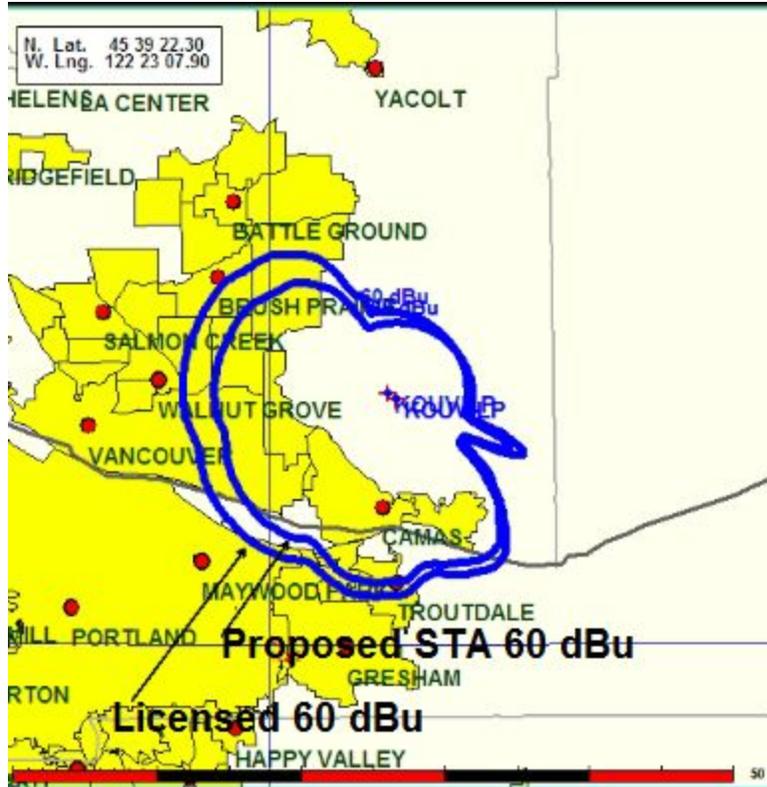
The public interest is furthered in the grant because the intended service of KDOA-LP is a hyperlocal community radio service for the Vancouver-Camas, Washington vicinity there is a deficiency of low power community FM stations which serves as a needed supplement to commercial and public radio in the area. The loss of the station would mean the radio channel would be re-utilized for commercial translator purposes, which is not in the public interest (automated programming of poor local significance).

The licensee has a plan in place for restored service via currently-granted construction permit. The licensee is requesting a six-week STA term which should be a conservative timeframe to establish a couple days of dry weather (it rains daily in the Northwest) to permit the climber to execute his job installing the antenna.

## **ENGINEERING**

KDOA-LP is licensed at a HAAT of 30 meters, therefore licensed for maximum ERP facility of 100 watts ERP. RSA respectfully requests the FCC to authorize a temporary facility at the closest site found, 0.82 km southeast from the licensed location.

Engineering STAs provide licensees to designate any location within the facility's 60 dBu contour to sustain temporary operation as long as the proposed is retained within the protected contour. Below demonstrates the maximum permitted LPFM facility's 60 dBu sanctioned by §73.811. Within the contour the temporary facility location with 60 dBu is presented.



Channel 248  
 New Location: 45-39-22.3 N 122-23-07.9 W (NAD 83)  
 45-39-22.9 N 122-23-03.6 W (NAD 27)

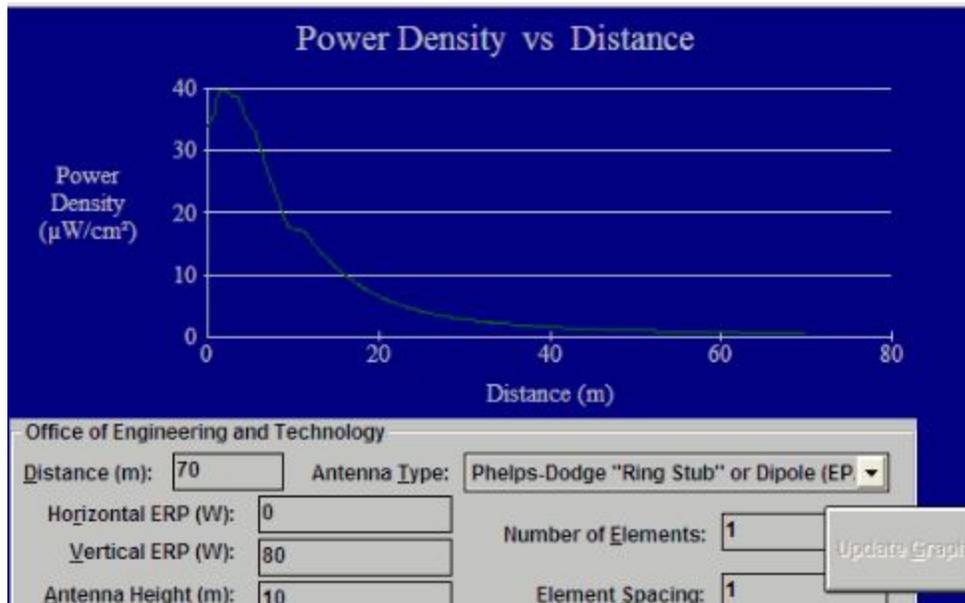
Antenna	AGL 10 m	
Antenna Ground	234.3 m Antenna	
COR	244.3 m	
HAAT	7.1 m	
ERP	80 w	
Antenna:	1-bay Scala FMVP	
Coax:	100 ft RG-213	
TPO:	Telecom FDCSDC03 combiner (insert. loss)	-0.6 dB
	100 ft RG-213	-2.2 dB
	Antenna Gain	0 dB
	80 w =	19.0309 dBw

$19.0309 \text{ dBw} + 2.8 \text{ dB (loss)} + 0 \text{ dB (antenna gain)} = 21.8309 \text{ dBW}$   
 $21.8309 \text{ dBw} = \underline{152 \text{ W TPO}}$

## TOWAIR

Established site (KIEV-LP). Passes TOWAIR.

## ENVIRONMENTAL COMPLIANCE



A one bay dipole antenna was used to gauge the maximum RF for the proposal in OET program FM Model for Windows demonstrating a peak exposure of 39.8  $\mu\text{W}/\text{cm}^2$  1.82 from the antenna. This is 20% of the FCC's Maximum Permissible Exposure (MPR) for 200  $\mu\text{W}/\text{cm}^2$  for Unrestricted Areas so the proposal passes compliance.