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FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET SW
WASHINGTON DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

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NOV 29 2011

Arizona Lotus Corp.
3301 Barham Blvd.
Suite 200
Los Angeles, California 90068

Re: Arizona Lotus Corp. ("ALC")
KTKT, Tucson, Arizona
Facility Identification Number: 2744
FCC File Number: BP-20110825AAN

Dear Applicant:

The staff has under consideration the above-captioned application proposing to change the authorized daytime and nighttime directional antenna systems station KTKT(AM) and decrease its nighttime power from 1 kW to 0.5 kW.

Our studies show that both KTKT(AM)'s licensed and pending application facility enter the 50 percent RSS limit of co-channel station KSVP(AM), Artesia, New Mexico. The pending application does not reduce KTKT(AM)'s contribution toward KSVP(AM) by 10%, in violation of § 73.182(q). Contributions to KSVP(AM)'s 50 percent night limit are shown in the table below.

Station	Single limit (mV/m)	RSS (mV/m)
CBW	6.0184	6.0184
XECL	5.985	8.4877
KTKT (BP-20110825AAN)	5.1515	9.9287

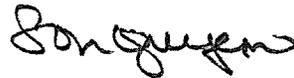
In its application, ALC states that it currently enters the 25% RSS of KSVP(AM), however Sheet 5 of Exhibit 17 clearly shows this to be incorrect as KTKT(AM) currently enters the 50% RSS of KSVP(AM). Thus, the application facility is required to either reduce its contribution to the RSS by 10%, or to a level at which its contribution no longer enters into the 50% RSS value.

It is noted that while processing the KTKT(AM) application, it was discovered that Mexican

record XECL¹ on 990 kHz at Mexicali, BN was not included in the FCC's database. This is an accepted grandfathered facility that should have been included in the FCC's database and therefore has recently been added. Inclusion of this record should help KTKT(AM) as XECL is a larger contributor to the 50% RSS of KSVP.

Accordingly, further action on the application will be withheld for thirty (30) days from the date of this letter in order to provide ALC an opportunity to amend the application. Failure to respond or file the amendment within this time period will result in dismissal of the application pursuant to 47 C.F.R. §73.3568. If you have questions, you may contact the processing engineer.

Sincerely,



Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau

cc: Jerome S. Boros
Mark A. Mueller

¹ The following XECL night record was accepted: XECL, Mexicali, BN, 990 kHz, 5 kW-ND-N-680 mV/m at 1 km, G=246.1 feet, N 32-37-48 W 115-30-06.