

### **Reason for STA Extension**

Cultural Energy ("CE") hereby requests further extension of this STA to operate KCEI with a reduced Effective Radiated Power ("ERP") of 1 KW using the directional antenna specified in KCEI's license.

CE remains prepared to operate KCEI at full-power but is forced to continue to operating at reduced power due to the power limitation placed by the United States Forest Service ("Forest Service") with respect to the KCEI tower site, which is located within the Carson National Forest in New Mexico. The Forest Service believes that operation of KCEI at full power might interfere with low power radio communication facilities in the area. CE continues to seek reconsideration of the limit based on its finding that no interference would be caused by full-power operations, but communication with the Forest Service has been difficult while many of Forest Service's offices remained closed throughout Covid-19 pandemic. The Forest Service's main office has only recently reopened, but CE has still not been able to negotiate a change in their position.

At half-power, KCEI still reaches more than 65,000 listeners -- albeit, with less than a 60 dbu signal. By operating at 1 KW, however, KCEI is unable to comply with section 73.515 of the Commission's rules, which requires that an NCE station cover at least 50% of its community of license or reach 50% of the population with a minimum field strength of 60 dbu. KCEI has been broadcasting in mono for more than two years now, which effectively doubles the strength of its signal, although this also does not satisfy Section 73.515. Due to the limited options for alternative tower sites in rural northern New Mexico and CE's limited financial capabilities, CE must continue to operate KCEI from its current tower site in accordance with the Forest Service's power restriction or cease operations altogether.

On July 14, 2017, CE filed an application to reduce KCEI's power permanently to 1 KW to comply with the Forest Service's power restrictions (*see* File No. BPED-20170714AAV). The application included a request for waiver of section 73.515 but was dismissed on July 18, 2018, due to non-compliance with the FCC's NCE community coverage rule.

Accordingly, CE requests an extension of this STA so that it may continue serving its listeners while it seeks a permanent solution that is consistent with both the Forest Service's power restriction and the FCC's NCE community coverage rule.