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In the matter of:

Cameron County, Texas

KCCP-LP

135175

Special Temporary Authority Request

Due to an impending loss of site, Cameron County Texas (Cameron) is requesting a Special Temporary Authority (STA) to operate using the following facilities:

Latitude (NAD83):	26-04-28.0 N
Longitude (NAD83):	97-09-46.0 W
Elevation:	1.8m
RCAGL:	10.7m
RCAMSL:	12.5m
Channel:	272LP100 (102.3 MHz)
ERP:	0.034 kW (34 watts) – Vertical
Antenna mode:	Nondirectional

Cameron operates KCCP-LP as a public safety Travelers Information Service (TIS) and the grant of this STA will assure that emergency information to this hurricane prone area remains operational as Cameron works towards locating a permanent site for this station.

The applicant does note that at 34 watts ERP, the 60 dBu STA service contour does include area outside of the 60 dBu service contour of the licensed facility, but within the area that was originally authorized in their construction permit. This area is located over a small amount of land area within the Lower Rio Grande Valley National Wildlife Refuge. This area is unoccupied and does not include any roads. It also includes areas over water (Gulf of Mexico and inland waters). We further note that KCCP-LP is currently operating at a reduced power due to transmitter equipment limitations and would otherwise be authorized 50 watts ERP. The proposed STA contour is within the 60 dBu service contour if KCCP-LP was authorized to operate at the full 50 watts ERP. In addition, at 34 watts ERP, the overall 34 dBu interfering contour is much than the licensed 34 dBu interfering contour and as a result, the STA facility provides an interfering contour wholly inside of the licensed contour. **This includes no increased interfering contour from the STA facility towards Mexico.** If anything, the interfering contour over Mexican territory is reduced.

This LPFM station is operated by the county government that has jurisdiction over the entire area within the 60 dBu contour of the licensed and proposed STA facilities and thus is responsible for the dissemination of official emergency information on behalf of the County. Located on nearly the southernmost section of the West Gulf Coast, South Padre Island is a major tourist destination due to both its beaches as well as the nearby SpaceX operations. This is also an area that is recognized as an area that is very prone to hurricanes and other natural disasters and is at great risk of storm surge of at least 9 feet on various portions of the island.

The station also operates as a Traveler's Information Station which normally provides local information for residents and visitors.

This STA grant would serve the public interest as it would assure that as many persons within the current 60 dBu service contour would be continued to be served with official emergency information from the primary first responder agencies in the area while not expanding the station to any population areas or major highways that are not currently covered by the licensed facility and further, this can be done without creating any new interference to any domestic facility, nor in the direction of Mexico. A grant of this STA would be an interim measure as Cameron works to identify a new site within County property to provide permanent service, including the potential of expanded service along South Padre Island taking advantage of rule changes that took place in the 2020 *LPFM Tech Order*.¹

As such Cameron is requesting the grant of this STA and if any waiver of 47 CFR §73.1635 is needed in order to maintain this critical emergency service with the most maximum reach possible during this interim period, it is so requested.

Prepared by,

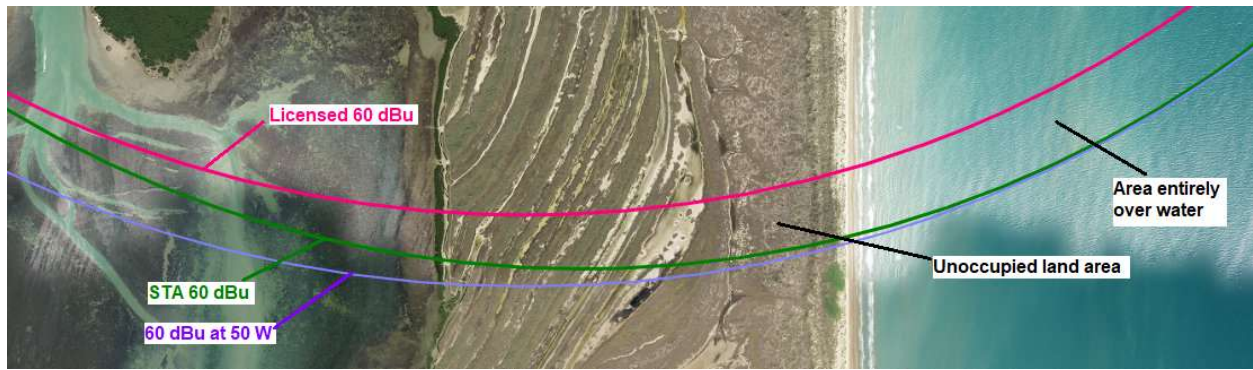
/S/

Michelle Bradley, CBT
Founder
REC Networks

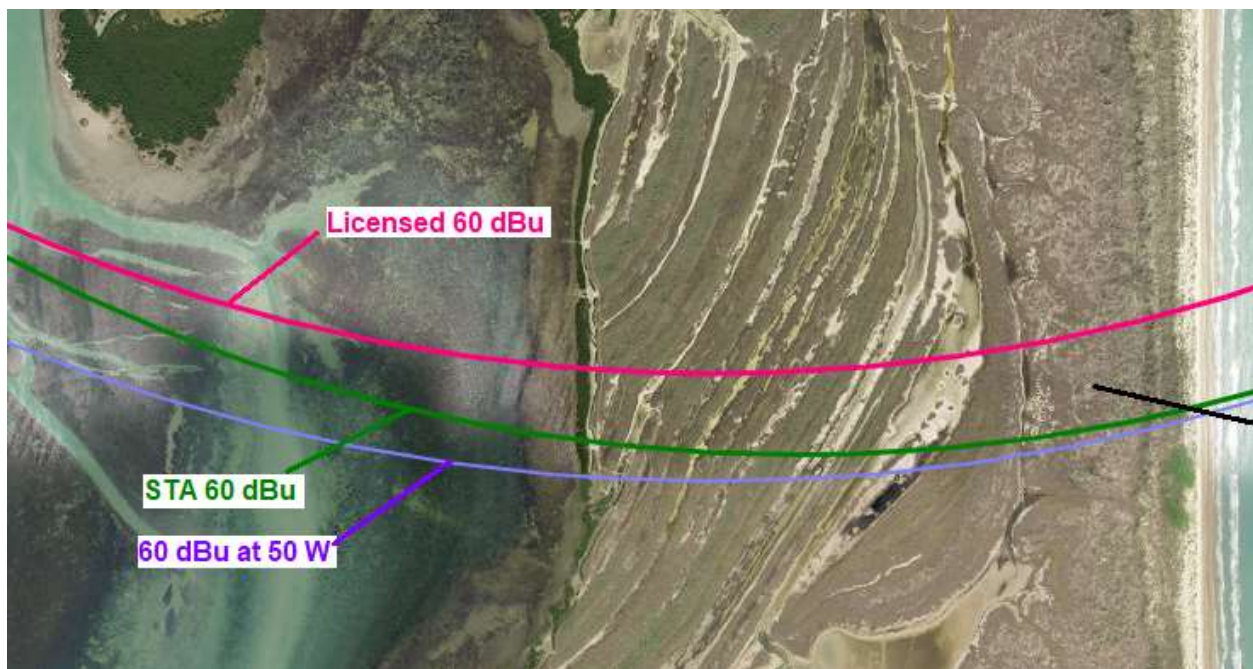
May 8, 2023

¹ *Amendments of Parts 73 and 74 to improve the Low Power FM Radio Service Technical Rules*, Report and Order, 35 FCC Rcd. 4115, et. seq. (2020) ("*LPFM Tech Order*") (Specifically, the use of a directional antenna to maximize the domestic reach of the station, see *Id.* at 4119.)

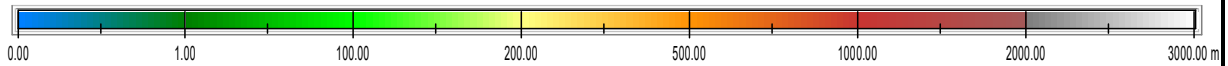
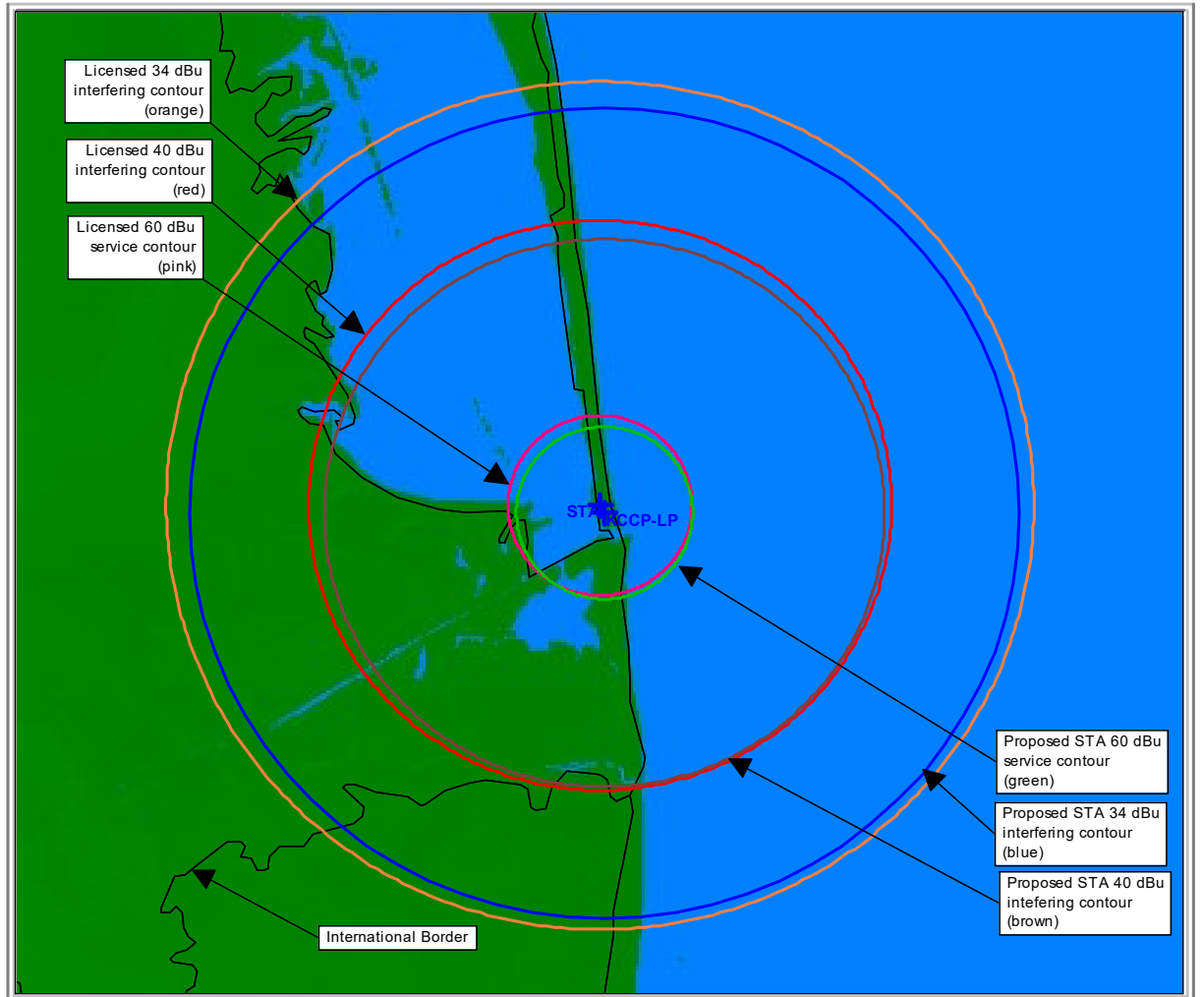
Area south of South Padre Island where the proposed STA facility would extend to.
The pink contour is the 60 dBu service contour of the currently licensed facility, held back at 40 watts ERP due to a transmitter limitation.
The green contour is the 60 dBu service contour of the proposed STA facility.
The purple contour is the 60 dBu service contour of the currently licensed facility as originally authorized with 50 watts ERP on BNPL-20010615APZ.



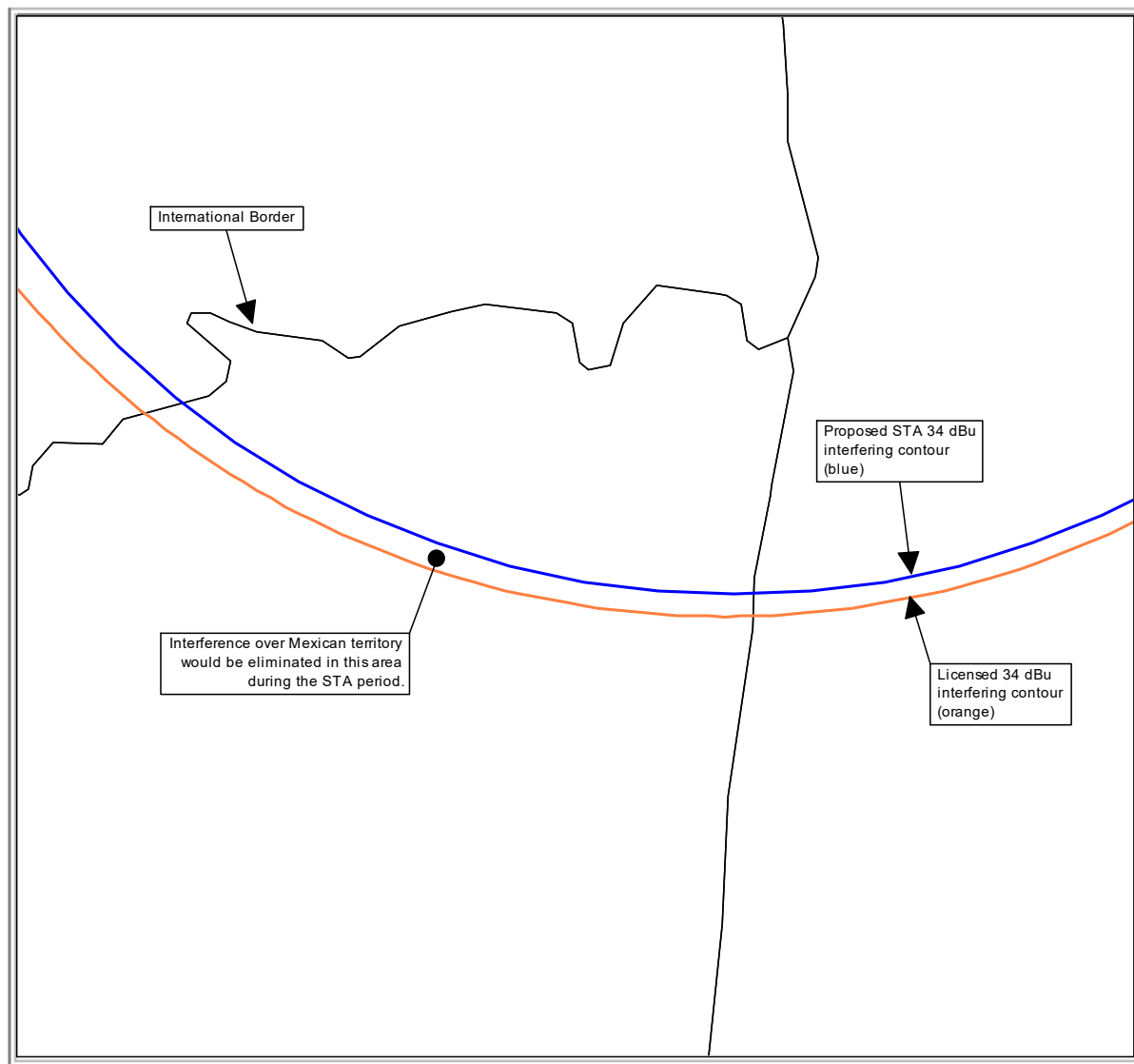
Close-up of land area which clearly shows no occupied structures or major four lane highways, thus demonstrating no population gain area as a result of the STA request:



KCCP-LP STA Request



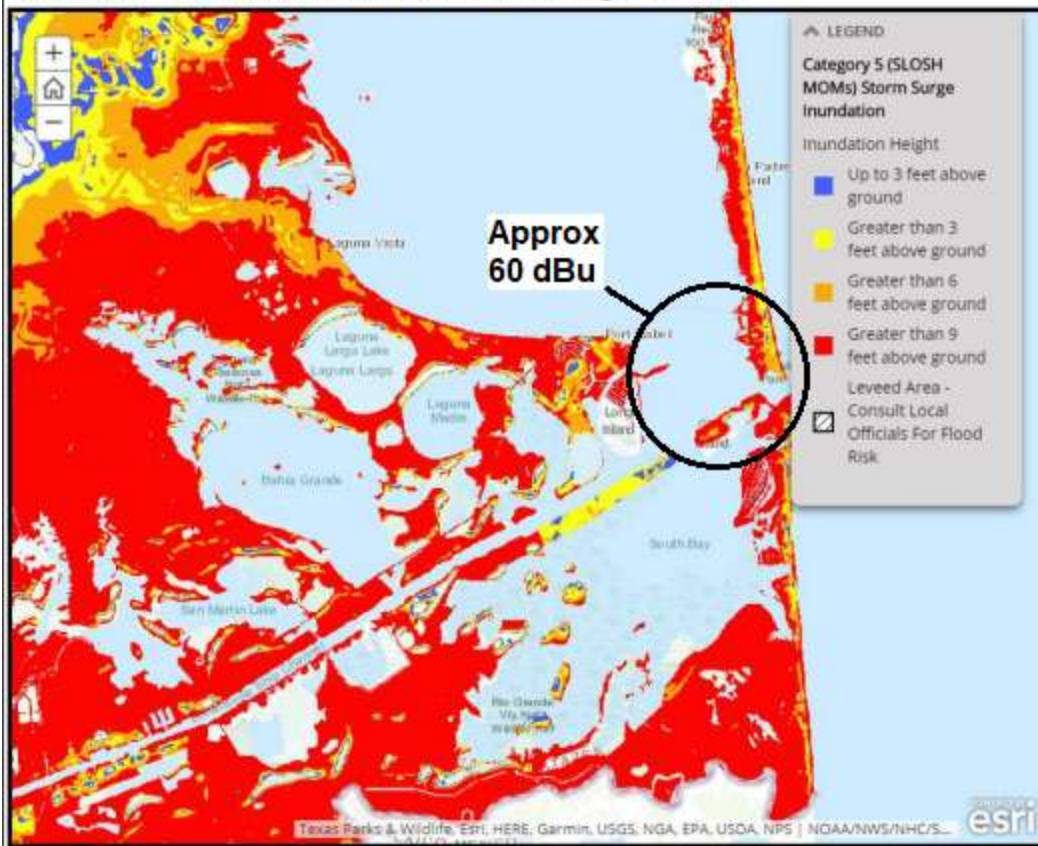
KCCP-LP STA Request



Reduction of 34 dBu interfering contour over Mexico during STA period.

Storm Surge

Zoomed: South Padre, Port Isabel, and Laguna Vista



Above: This map shows the height above ground the water could reach and depicts the reasonable worst-case scenario from storm surge flooding.

From *The Official Rio Grande Valley/Deep South Texas Hurricane Guide*, 2022 edition, published by the National Weather Service. Edited to show the location of the LPFM station in respect to the overall map.