

**Call letters:** W233AN (STA)  
**City of License:** Richmond, IN  
**Channel:** CH233D (94.5 MHz)  
**File No:** Special Temporary Authority  
**Facility ID:** 140563  
**Applicant:** STAR Educational Media Network, Inc.

**Requested STA Purpose:** Engineering STA

**Technical Specification:** Request for "Other Antenna System"

## Explanation of Special Temporary Authority (STA) Request

W233AN - Richmond, IN (Facility ID: 140563) is presently licensed under BLFT-20060508AAS with 0.120 kW ERP (H&V) of non-directional power at an Antenna COR of 316 meters AMSL (16 meters AGL). W233AN is presently licensed with an SWR Model FMEC-2 (1/2 wave-spaced) antenna with a Transmitter Power Output (TPO) of 0.185 kW. The antenna is located on an unregistered 17 meter AGL tower.

W233AN has been most recently operating under Special Temporary Authority (STA) Extension LMS(extsta)-0000203296, which was understood to have expired at 12:01 AM; May 12, 2023. Due to client oversight, a further extension of LMS(extsta)-0000203296 was necessary; but not filed before the STA expiration deadline. Therefore, this new Special Temporary Authority (STA) Request is being filed for identical temporary parameters to LMS(extsta)-0000203296; and may be viewed as a *de facto* extension of LMS(extsta)-0000203296.

Historically, W233AN was taken silent under BLSTA-20200427AAX due to a 47 C.F.R. Section 74.1232(b) duplicate programing issues related to the commencement of W247DN - Richmond, IN (Fac ID: 140566) license LMS(lic)-0000112783 and also subsequent loss of the W233AN site. W233AN recommenced operation under BSTA-20210415AAG and has been continuously in service to date (*via the original BSTA-20210415AAG grant and various STA extensions*). As stated before, this new Special Temporary Authority (STA) Request is being filed for identical temporary parameters to the most recent LMS(extsta)-0000203296; and may be viewed as a *de facto* extension of the prior STA.

At this time, STAR Educational Media Network Program Director Don Buettner and Engineer Greg Case report negotiations for the sale of the FM Translator to the initial buyer have stalled; with the licensee now pursuing a sale of the Translator to other third parties. In addition, studies have also been conducted concerning a future relocation and duplexing of W233AN into the W247DN - Richmond, IN (FAC ID: 140566) antenna. Regardless, continued operation from the current Special Temporary Authority (STA) site (*or the roof mounted transmitter building pole of nearby FM station WFMG(FM) - Richmond, IN*) will be necessary.

Therefore, this Special Temporary Authority (STA) request is being refiled for temporary operation from a 10 ft pole located on the roof of the WFMG(FM) transmitter building. The STA operation will utilize 1.5 watts ERP (*circular polarization*) from an SWR Model FM1-1(NDA) non-directional antenna mounted at 7.5 meters AGL (309.5 meters AMSL). The proposed Special Temporary Authority (STA) service contour will remain wholly within the W233AN licensed service contour (BLFT-20060508AAS) as documented in the attached Licensed vs Proposed STA Service Contour Map. A change in the primary station to WFMG(FM) - Richmond, IN; CH267B1 (Facility ID: 41845) is also requested herein. Additional FM Translator and site documentation exhibits have also been included. TPO for the 1.5 watt STA operation has been calculated to be 4 watts, as included in the attached TPO Calculation Worksheet.

Temporary operation at variance from the Commission's rules is believed merited in this instance as this STA (1) seeks temporary relief from the provisions of 47 C.F.R. Section 74 Subpart L(74.1201-74.1290) and Subpart H(73.1001-73.4280); (2) serves the public interest by maintaining a W233AN service to the area, as opposed to taking the station silent; and (3) is not expected to exceed an STA duration of 180 days from the time of the STA filing until a site relocation and new final primary station can be found. A return to licensed operation at the present site is not likely; therefore, a relocation to an alternate site location is anticipated. It is also anticipated the applicant will file a future construction permit relocation application to a new site in the future.

The applicant certifies RF Compliance with the attached study. Regarding compliance with the NEPA, Nationwide Programmatic Agreement and NHPA Section 106 for tower co-location, compliance with the Agreement is not required where no new tower construction is being proposed and the tower is not being substantially altered. Specifically, compliance is not necessary where only an antenna and feed-line are being added to an existing building, as here. However, should the Commission determine compliance is necessary, upon notification the applicant will file FCC Form 621.

**CERTIFICATION OF TECHNICAL CONSULTANT:** *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-four years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher  
Technical Consultant  
May 12, 2023