

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
<b>Extension of Existing Engineering STA</b>  Read Instructions/FAQ before filling out form		FOR COMMISSION USE ONLY FILE NO.

**Section I - General Information**

1.	Legal Name of the Applicant <b>Intelli LLC</b>		
	Mailing Address <b>1692 Tully Rd. Suite 9</b>		
	City <b>San Jose</b>	State or Country (if foreign address) <b>CA</b>	Zip Code <b>95112</b>
	Telephone Number (include area code) <b>408-838-4075</b>		E-Mail Address (if available) 
	FCC Registration No <b>0017702846</b>	Call Sign <b>KSPA</b>	Facility ID Number <b>13899</b>
2.	Contact Representative (if other than licensee/permittee) <b>DAN J. ALPERT</b>		Firm or Company Name <b>THE LAW OFFICE OF DAN J. ALPERT</b>
	Mailing Address <b>2120 N. 21ST RD.</b>		
	City <b>ARLINGTON</b>	State or Country (if foreign address) <b>VA</b>	ZIP Code <b>22201 -</b>
	Telephone Number (include area code) <b>7032438690</b>		E-Mail Address (if available) <b>DJA@COMMLAW.TV</b>
3.	Purpose: <input checked="" type="checkbox"/> Engineering STA <input checked="" type="checkbox"/> Extension of Existing Engineering STA      File Number: <b>BSTA-20210415AAI</b> <input type="checkbox"/> Legal STA <input type="checkbox"/> Extension of Existing Legal STA		
4.	Service: <b>AM</b>		
5.	Community of License: City: <b>Ontario</b> State: <b>CA</b>		
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="checkbox"/> Governmental Entity <input type="checkbox"/> Noncommercial Educational Licensee/Permittee <input type="checkbox"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
7.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b>  By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.		<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 33]

8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 34]
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing <b>Tron Dinh Do</b>	Typed or Printed Title of Person Signing <b>Managing Member</b>
Signature <b>/Tron Dinh Do/</b>	Date (mm/dd/yyyy) <b>2/2/2023</b>

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

## Exhibits

### Exhibit 34

Description: JUSTIFICATION

#### See Attached.

The licensee has been consulting with engineering counsel, who has provided recommendations concerning potential diplexing partners. It is hoped that such an arrangement can be reached expeditiously, in which case an FCC Form 301 will be filed in the next three months.

Attachment 34

STEPHEN S. LOCKWOOD, PE, PMP

THOMAS M. ECKELS, PE  
THOMAS S. GORTON, PE

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
ERIK C. SWANSON, PE, PMP  
DAVID J. PINION, PE  
STEPHEN PUMPLE, M.Eng, MBA, PMP  
CONSULTANTS

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151  
FACSIMILE (206) 789-9834  
E-MAIL [hatdaw@hatdaw.com](mailto:hatdaw@hatdaw.com)

MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

## ENGINEERING STATEMENT:

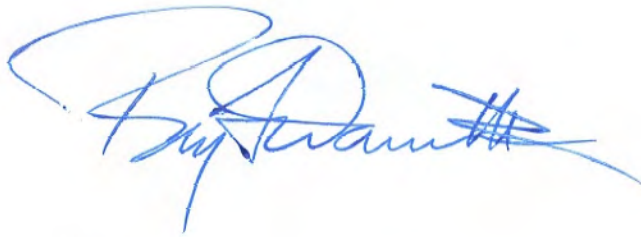
This Engineering Statement supports an application for Special Temporary Authority for AM broadcasting station KSPA, Ontario, CA, Facility ID # 13899, licensed to Intelli LLC.

Having lost its licensed transmitting site, the licensee has diligently searched for a suitable alternative site which could be specified in an application for construction permit, without success. Therefore this report specifies a site for Special Temporary Operation, to allow the station operation with limited facilities.

The site specified is located at 325 N. Mountain Avenue, within the city of Ontario. The facility proposed will consist of an Information Station Specialist TR6000 (15.73) transmitter, and AN16 (ANXX) antenna system. They will be roof mounted on the existing building structure at this address. The roof is 4.5 meters in height, and the AN16 antenna is 4 meters in height, for an overall elevation of 8.5 meters above ground level. The roof is inaccessible and the building will be provided with suitable signage on all sides. The building and roof are of predominately metal construction, and so together with the AN16 antenna system grounding will result in an inverse distance field of approximately 27 mV/m/kW/km. Operation will be with the 10 watt TPO of the ISS TR6000 transmitter. The coordinates (NAD-27) for this location are NL 34° 04' 00" by WL 117° 40' 10". The resulting service contour will be well within the authorized service area of KSPA.

Functionally identical transmitter and antenna systems have been authorised for Special Temporary Authority operation by previous Commission actions including, among others, those for KGDD (BESTA 20200309AAO) and WJBW (BSTA 20200513AAK).

April 14, 2021

A handwritten signature in blue ink, appearing to read "Benj. F. Dawson III", with a stylized flourish at the end.

Benj. F. Dawson III, P.E.



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### Online Payment Confirmation

Total Amount	\$290.00
Payer FRN	0003777588
Payer Name	dja@commlaw.tv
Remittance ID	3827682
Treasury Tracking ID	270B6INR

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