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November 4, 2015

**VIA E-MAIL CORRESPONDENCE**

Federal Communications Commission  
Media Bureau  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Live Sports Radio, LLC  
FRN: 0017-5077-16  
Request for Special Temporary Authority to  
Operate a Low Power Television Facility  
SAP Center, San Jose, CA

Dear Sir/Madam:

Live Sports Radio, LLC, ("LSR"), via undersigned counsel, hereby requests special temporary authority ("STA") to operate a low power television facility within the Analog Channel 3 band at the SAP Center, San Jose, California, from January 31, 2016 to February 8, 2016.

This STA is requested to allow LSR to provide continuous live coverage of events to the spectators who otherwise would not be able to hear live coverage. LSR has been sanctioned by the NFL to provide continuous live coverage at this location, and this service will allow the attendees to hear play-by-play coverage.

Without this service, no on-site live audio coverage will be available to the spectators. In addition, the service will provide a significant public interest benefit – it is the only way to communicate with attendees in the event of severe weather, a terrorist attack, or other emergency and provide the attendees with potentially life-saving instructions. There is no other communication system available to spectators that is either feasible or practical for this purpose.

Attached is an Engineering Statement describing the proposed operation, and confirming that the proposed operation within Analog Channel 3 will not cause objectionable interference to any existing low power television operators. In the event that a mounting device (i.e., pipe) is installed at the proposed location, it will be less than six meters above ground. The antenna is vertically polarized.

Federal Communications Commission  
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The undersigned has been authorized to state that no party to the applicant is subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. Also enclosed is the Fee Receipt issued by the FCC's Fee Filer System indicating that the filing fee of \$175.00 (Fee Code MGL) has been paid online.

Please contact undersigned counsel should you have any questions regarding this request.

Respectfully submitted,



Lee G. Petro

*Counsel for Live Sports Radio, LLC*

Enclosures

### Section III - Engineering

#### TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

#### TECH BOX

1. Channel: 3
2. Frequency Offset:  
☒ No offset      ☐ Zero offset      ☐ Plus offset      ☐ Minus offset
3. Translator Input Channel No. N/A
4. Primary station proposed to be rebroadcast:

Call Sign	City	State	Channel
N/A	N/A	N/A	N/A
5. Antenna Location Coordinates: (NAD 27)  
37 ° 19 ' 58 "    ☒ N    ☐ S Latitude  
121 ° 54 ' 04 "    ☐ E    ☒ W Longitude
6. Antenna Structure Registration Number: N/A  
☒ Not applicable      ☐ FAA Notification Filed with FAA
7. Antenna Location Site Elevation Above Mean Sea Level: 26 meters
8. Overall Tower Height Above Ground Level: 18.5 meters
9. Height of Radiation Center Above Ground Level: 18.5 meters
10. Maximum Effective Radiated Power (ERP) Towards Radio Horizon: 0.005 kW
11. Maximum ERP in any Horizontal and Vertical Angle: 0.005 kW

Based on a study of all authorized stations in the Commission's CDBS database\*, it was determined that this channel would be best suited for the proposed operation. The proposed facility either complies with the Commission's LPTV contour overlap protection requirements or causes no additional population interference in excess of the Commission's limit when studied per OET Bulletin No. 69. Nevertheless, the applicant recognizes the secondary status provided under STA and will cease operation or reduce power as necessary in the event actual interference occurs. According to the applicant, no portion of the antenna will extend more than 6.1 meters above permanent structures.

\* - The study excluded unbuilt CP facility of K04RS-D, San Juan Bautista CA (BPDVL-20150219AAL).

Note: See Exhibit A for specific details regarding the proposed operation.

12. Transmitting Antenna: ☒ Nondirectional ☐ Directional "Off-the-shelf" ☐ Directional composite

Manufacturer	Model
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Directional Antenna Relative Field Values:

Rotation: \_\_\_\_\_° ☐ No rotation ☒ N/A (Nondirectional)

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

#### CERTIFICATION

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply.

☒ Yes ☐ No

See Explanation  
in Exhibit No.

**TV broadcast analog system protection.**

- a. ☐ 47 C.F.R. Section 74.705.

**Digital TV station protection.**

- b. ☒ 47 C.F.R. Section 74.706.

**Low Power TV and TV translator station protection.**

- c. ☒ 47 C.F.R. Section 74.707.

14. **Environmental Protection Act.** 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 RF compliance. An **Exhibit is required.**

☒ Yes ☐ No

See Explanation  
in Exhibit No.


Exhibit No.

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.

**PREPARER'S CERTIFICATION ON PAGE 6 MUST BE COMPLETED AND SIGNED.**

### SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Daniel G. Ryson		Relationship to Applicant (e.g., Consulting Engineer) Consultant	
Signature 		Date October 30, 2015	
Mailing Address Cavell, Mertz & Associates, Inc.; 7724 Donegan Drive			
City Manassas		State or Country (if foreign address) Virginia	ZIP Code 20109-2868
Telephone Number (include area code) (703) 392-9090		E-Mail Address (if available) dryson@cavellmertz.com	

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).

## **EXHIBIT A**

Live Sports Radio, Inc., will be utilizing a video transmitter as an exciter feeding the power amplifier portion of a modified PTEK TV band audio FM transmitter followed by a custom designed Low Pass Filter. The video aspect of the proposed operation will consist of rotating video screens containing information relating to the event, and instructions for operating the Live Sports Radio-provided device.

### **Equipment List:**

#### **Video Transmitter -**

1. LSR- designed bandwidth limited Monochrome video generator.
2. Blonder-Tongue RF modulator ACM-806.
3. Power amplifier section of a PTEK FM audio transmitter.
4. Integrated 3-Section Low Pass Filter for harmonic reduction, internal to the PTEK FM audio transmitter.
5. Vertical flexible whip antenna AD-44 design omni-directional.

#### **Audio Transmitter –**

1. PTEK FM audio transmitter.
2. Vertical flexible whip antenna AD-44 design omni-directional.

It is expected that the video and audio transmitters will be operating at different locations on the premises of the event. Therefore, the coordinates provided in Section III, Question 5 of the Tech Box, to which this exhibit is attached, is an estimated location for the transmitters. At no time will the actual location of the transmitters be located off-premises and neither the audio or video signal is expected to extend beyond the event location.