



Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, NW | Washington, DC 20036 | tel 202.663.8000 | fax 202.663.8007

Lee G. Petro  
tel: 202.663.8113  
lee.petro@pillsburylaw.com

December 9, 2019

**VIA CDBS**

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  
Orlando, Florida

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 5 band at Camping World Stadium, Orlando, Florida, from December 30, 2019, to January 2, 2020.

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 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 as **Exhibit A** is an Engineering Statement describing the proposed operation, and confirming that the proposed operation within Analog Channel 5 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. The FCC has previously approved the identical facility (see **Exhibit B**).



December 9, 2019

Page 2

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 \$200.00 (Fee Code MGL) has been paid online.

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

Respectfully submitted,

A handwritten signature in blue ink, reading "Lee G. Petro". The signature is written in a cursive style with a horizontal line underneath.

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:	<u>5</u>		
2.	Frequency Offset:			
	<input checked="" type="checkbox"/> No offset	<input type="checkbox"/> Zero offset	<input type="checkbox"/> Plus offset	<input type="checkbox"/> Minus offset
3.	Translator Input Channel No.	<u>N/A</u>		
4.	Primary station proposed to be rebroadcast:			
	Call Sign	City	State	Channel
	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
5.	Antenna Location Coordinates: (NAD 27)			
	<u>28</u> °	<u>32</u> '	<u>20</u> "	<input checked="" type="checkbox"/> N <input type="checkbox"/> S Latitude
	<u>81</u> °	<u>24</u> '	<u>11</u> "	<input type="checkbox"/> E <input checked="" type="checkbox"/> W Longitude
6.	Antenna Structure Registration Number:	<u>N/A</u>		
	<input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> FAA Notification Filed with FAA		
7.	Antenna Location Site Elevation Above Mean Sea Level:	<u>31</u>	meters	
8.	Overall Tower Height Above Ground Level:	<u>18.5</u>	meters	
9.	Height of Radiation Center Above Ground Level:	<u>18.5</u>	meters	
10.	Maximum Effective Radiated Power (ERP) Towards Radio Horizon:	<u>0.005</u>	kW	
11.	Maximum ERP in any Horizontal and Vertical Angle:	<u>0.005</u>	kW	

Based on a study of all authorized stations in the Commission's LMS 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.

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

Manufacturer <b>TRVAL</b>	Model <b>AD-44/CW-AH2</b>
------------------------------	------------------------------

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.**

## **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.

**EXHIBIT B**



FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> Street, S.W.  
Washington, D.C. 20554

**August 24, 2018**

Live Sport Radio, LLC  
1200 Seventeenth Street, N.W.  
Washington, DC 20036

In re: Special Temporary Authority Request of:  
Live Sport Radio, LLC  
New, Channel 5, Orlando, FL  
Temporary Call Sign: W05ST  
BSTA-20180816ABF

Gentlemen:

This is in reference to your request for Special Temporary Authority to operate the above-captioned low power television or television translator station.

In light of the facts set forth therein, your request for Special Temporary Authority IS HEREBY GRANTED to operate the facility from August 30, 2018 through September 2, 2018 in accordance with the specifications in the above application. This authority is conditioned upon the avoidance of interference to any existing facilities.

Sincerely,

Hossein Hashemzadeh  
Associate Chief  
Video Division  
Media Bureau

cc: Lee G. Petro, Esquire