

Summary to clarify Silent periods - KVSJ-FM

The most recent Silent Notification documents the station as off air on May 2021 during construction on the permanent facility and program feed via STL (studio-to-transmitter link) to better ensure continuous operation.

Upon completion of modifications to the transmission system and housing, the licensee (Peace and Justice Network of San Joaquin County) has filed a new Engineering STA seeking to operate at reduced facilities while final adjustments are made in tandem with equipment and program tests, after which a new License to Cover would then be filed.

However, there were several instance of downtime between April 2020 and September 2021. During this period, planned construction and modifications had to be rescheduled due to the COVID-19 pandemic. Construction and modifications eventually resumed while the facility operations continued under the temporary authorizations, but required frequent reboots while a new permanent STL and transmission systems were established.

As of this writing, major construction has been completed, and the licensee is seeking clearance to resume operations, test the new/improved facility, and make final adjustments before filing a new License to Cover.

Below is a comprehensive description of construction progress made while under temporary authorization and silent periods:

- On November 7th, 2019 upon expiration of the previous short-term renewal, licensee sought to continue operations under Legal STA application BLSTA-20191107AAH. Despite several efforts to obtain clearance, licensee received no reply from staff. In an abundance of caution, licensee chose not to risk returning to air unless or until clear authorization was issued by the Commission.

- On April 27, 2020 shortly after the pending renewal was granted, Engineering STA application BESTA-20200424AAG was authorized allowing the licensee to resume operations with reduced power during statewide lockdown measures to the COVID-19 pandemic.

Although the licensee commenced operations at reduced power on April 29th, several problems were discovered within two weeks after reinstallation of the transmission system and program feed. As a result, the facility required several reboots between April and October 24, 2020, at which time the STA lapsed.

- In November 2020, licensee submitted yet one more application seeking to continue operations at reduced power while alternate plans were made to fully complete construction of the new permanent facility (see BSTA-20201102AAU).

Since the CDBS system did not automatically denote expiration of temporary authorizations, it was not possible to file a 'Resumption of Operations' in CDBS referencing the lapsed STA. The engineer managing the construction project therefore submitted a letter via email confirming the station resumed broadcasts as of November 5th, 2020 under the new STA.

- Despite ongoing adjustments to the remote wireless hotspot, the temporary facility incurred several periods of downtime which required frequent reboots over the course of two months. By mid-December 2020, new vendors were sought to provide a new wireless broadband feed to replace the previous remote WiFi service.

- In January 2021, a new broadband service provider was chosen to establish a new remote feed at the antenna site in place of the previous system.

- Although the new broadband feed resulted in considerably less downtime, ongoing adjustments continued through February and March 2021.

- In addition to the new broadband service, another contractor was hired to design and installed a new electrical facility dedicated to the transmission system, which further reduced periods of downtime.

- With all previous known causes of downtime eliminated by end of March 2021, and in anticipation of an eventual reopening of the main studio, work then commenced to upgrade the direct feed to the antenna site from the studio location.

After further adjustments and testing in April 2021, the studio, STL and transmission system were determined as ready for full-power operation, when a new, unexpected problem arose:

- Shortly after installation of the full-power transmitter at the antenna site, a new series of outages occurred. It was determined that the original cooling mechanism set up in the equipment cabinet was inadequate for handling the demands of a higher-powered transmitter operating continuously at 24/7. The transmitter had failed and required repair.

- In lieu of filing yet another extension to the temporary authorization, further work on the permanent facility was ordered to install an improved circulation system to provide sufficient inflow and outflow of air through the cabinet.

- With the original scope of the work expected to be completed by mid-May, the planned extension was placed on hold. However, the first chosen contractor did not arrange to proceed with the job in a timely manner, and so a new contractor was sought and eventually found.

However, work could be performed only on weekends. As a result, the facility remained off-air longer than anticipated.

- As a result, the previous Engineering STA simply lapsed in May 2021, until the new modifications were completed at the end of September 2021.

- In early October with the upgraded facility ready for testing and operation, licensee filed a new Engineering STA.

- Meanwhile. Early program and equipment tests through the STL to the transmitter were continually returned few or no instances of any downtime or technical issues at the antennas site.

Further tests of program feeds from the main studio also proved contiguous and stable.

- As of this writing, the license has two pending applications, and would be content if one or the other were reviewed and granted: the Engineering STA, and a Minor Modification seeing a power increase to 270 watts (slight increase from 240 watts granted via the previous authorization).

While licensee would prefer a brief opportunity to conduct additional tests under the proposed Engineering STA, the group is also prepared to commence with full operation at either the previous construction permit authorization granted for 240 watts, or go directly to 270 watts upon confirmation that the engineering exhibit complies with 47 CFR 73.509.

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The above summary is documented within the STA applications themselves, as well as within the Public Files. Licensee can provide additional details and documentation upon request.