

**AMENDED ENGINEERING SPECIAL TEMPORARY AUTHORITY  
KUSF-LP, SAN FRANCISCO, CALIFORNIA  
CHANNEL 241, FACILITY ID 196917**

World Peace Through Technology Organization ("WPTTO") here within requests an Engineering STA for operation at a temporary broadcast site to continue serving its community due to limiting circumstances outside of its control. WPTTO believes there is good cause to grant a temporary facility and that maintaining the license of KUSF-LP is in the public interest.

**BACKGROUND**

After being short-spaced by co-channel translator permit K241DC San Francisco, the licensee had to cancel its plan to serve its target population to the south from its current area in Marin County. Because of this short spacing, the amount of available sites was limited since all open space on the Marin peninsula is park land, and the rest is high density commercial or residential area that cannot accommodate second adjacent non-zero population waivers. WPTTO found one site availability at a water tower in Sausalito and filed for a construction permit. Upon final preparation to co-locate via modification FCC File No. 0000129906, the site management company recently cited additional stipulation that it wanted site leasers to mount antennas to the side/plush to the tower metal tank. This will not work for FM broadcasting.

KUSF-LP previously filed for BSTA-20211213AAL on December 12, 2021 but was denied because the proposed facility was stated not to be within KUSF-LP FCC-asserted contour of a 3 km circle. **The confusion in this application appears to stem from a previous possible LMS form calculation error that states although the Ground AMSL on the previous construction permit for the licensed facility is 131 M -- with structure 14.2 and HAAT 76 m -- the Height of Radiation Center Above Mean Sea Level is listed at 17 m instead of 145.2 m. The application was submitted when LMS was still in a de facto beta phase with errors being worked out. These numbers are imparting a false 3 km 60 dBu contour. This is where a mix-up arises within the last Engineering STA request, where a 5.6 km radius was assumed.** Hence, the spirit of the Engineering STA proposal was to align with FCC rules. The licensee apologizes for the discrepancy.

However, this request now submits a different site for now -- an indisputable temporary site that complies with location within the "licensed 60 dBu". This new timely-submitted request proposes temporary coverage within the 3 km KUSF-LP for which the licensee will return to air due to the impending need to immediately be back on the air by FCC rules. The discrepancy of the correct contour for "KUSF-LP licensed" can be worked out later.

**REQUEST FOR TEMPORARY OPERATIONS**

Facility needs to return to air by December 23, 2021 to retain its license via BESTA-20210628AAH, in accordance with 47 U.S.C. § 312(g). Licensee has returned to air at

a temporary location within its service area until it can negotiate accommodations to co-locate within the proposed permit site proximity without interference from the tank.

WPTTO believes the aforementioned situation constitutes extraordinary circumstances beyond the control of the licensee, permitting restoration or relocation of existing facilities to continue communication service, which is consistent with 47 C.F.R. § 1.913.

The public interest is furthered in the grant of this Engineering STA because this is a LPFM facility proposed for use by the community and high school for where there are very few radio services devoted for this use. LPFM station and second adjacent channels have stringent permitting situations where there is a paucity of available sites that work. Furthermore, the facility needs to return to broadcast to retain the license.

The licensee has a plan in place for restored service via currently-granted construction permit. Temporary broadcast for this Engineering STA would like to commence by December 19, 2020.

## ENGINEERING

KUSF-LP has lost the use of its current antenna because it is defective, imparting intolerable SWR. A temporary antenna is being used. Using the current site elevation numbers from the licensed facility, the temporary antenna at 1 watt fits within the current licensed FCC contour.

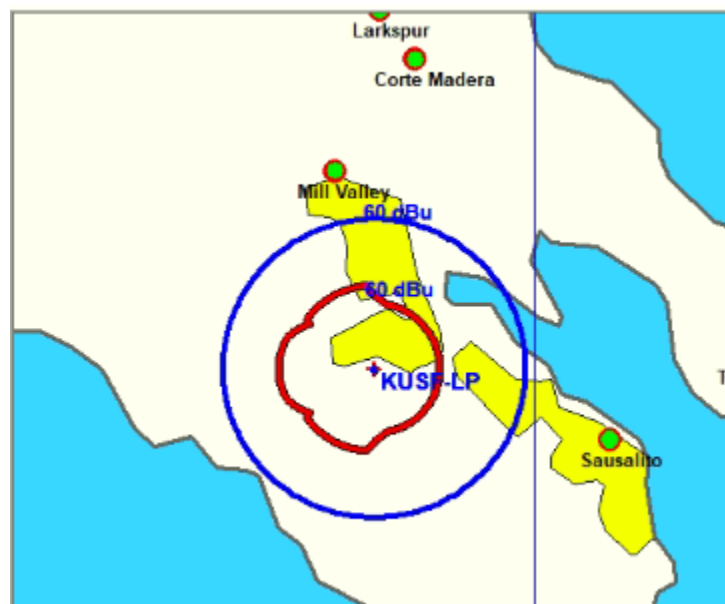
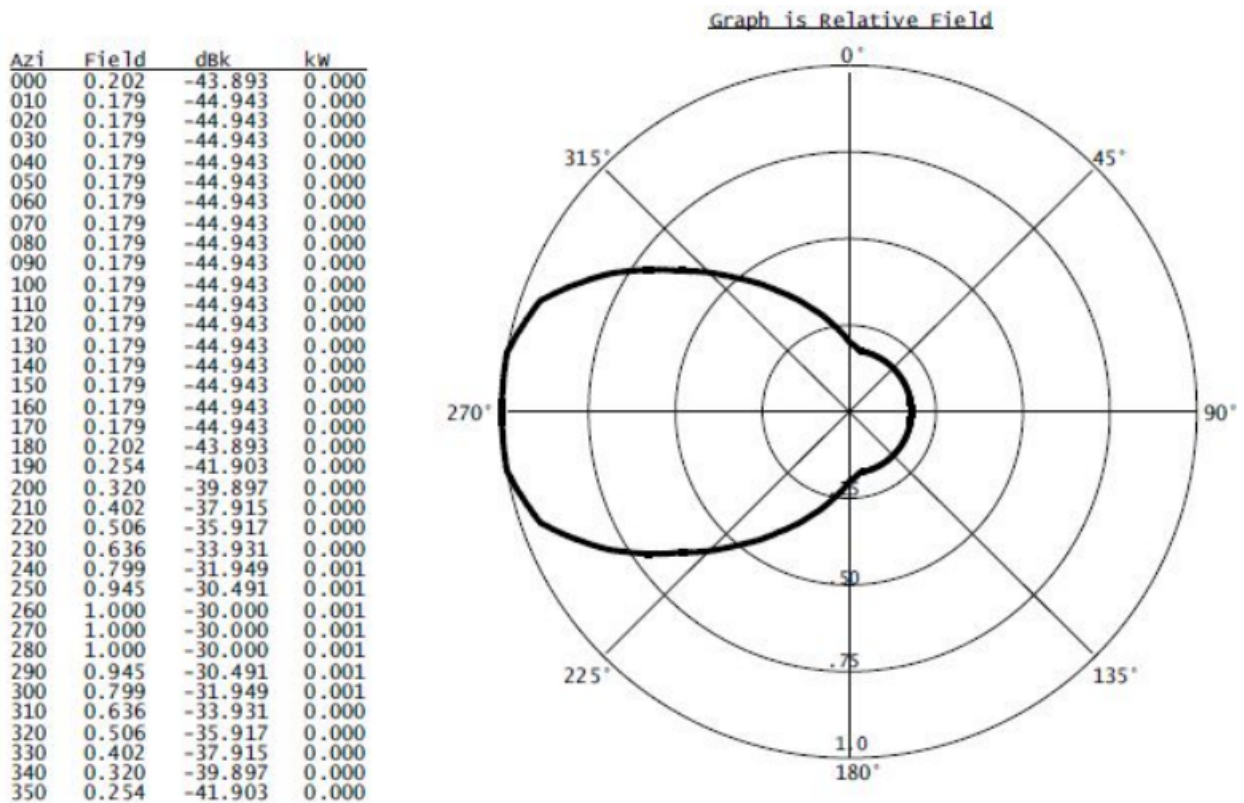


Figure 1: Proposed temporary broadcast (red) and licensed (blue).

## PARAMETERS

Channel 241  
 Location: 37-52-17.8 N 122-32-03.0 W (NAD 27)  
 37-52-17.5 N 122-32-06.9 W (NAD 83)  
 Antenna AGL 7.6 m  
 Antenna Ground 131 m Antenna  
 COR 17 m (COR AMSL *from the KUSF-LP license*)  
 HAAT 71 m  
 Power 1 w  
 Directional Antenna: SAM-159 yagi H-POL



KUSF-LP will work to return to a licensed site within upcoming weeks and respectfully requests the Commission to allow the use of this temporary broadcast location.

## NON IONIZING RADIATION STUDY

RF for the proposal in OET program FM Model for Windows. The maximum predicted RF exposure was less than 5% ( $0.37 \mu\text{W}/\text{cm}^2$  on ground,  $2.3 \mu\text{W}/\text{cm}^2$  on 3m roof) of the FCC

Maximum Permissible Exposure (MPR) for  $200 \mu\text{W}/\text{cm}^2$  for uncontrolled environments. 47 CFR 1.1307(b)(3) exempts applicants from preparing an Environmental Assessment when predicted exposure levels would be less than 5%.

