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October 16, 2008

Mark N. Lipp, Esq.
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006

Re: KTCT(AM), San Mateo, California
Facility Identification Number: 51188
Susquehanna Radio Corporation
Special Temporary Authorization

Dear Counsel:

This is in reference to the request filed October 14, 2008, on behalf of Susquehanna Radio Corporation ("SRC"), licensee of Station KTCT(AM), San Mateo, California. SRC requests special temporary authority ("STA") to operate Station KTCT during daytime hours with a temporary nondirectional antenna and reduced power, for the purpose of conducting field strength measurements.¹ In support of its request for extension, SRC states that the proposed field strength measurements are necessary to establish the ground conductivity in the area, and that nondirectional operation will provide a stable reference field to most accurately establish the conductivity.

Our review indicates that the proposed STA operation complies with the technical provisions of Section 73.1615, which governs operation during modification of facilities. Our review also indicates that SRC has a long-pending application for modification of the KTCT facilities.²

Accordingly, the request for STA IS HEREBY GRANTED. Station KTCT may operate during non-critical daytime hours with a nondirectional antenna and reduced power not to exceed 12.5 kilowatts, only as necessary for the performance of the planned field strength measurements. It will be necessary to reduce power or cease STA operation if complaints of interference are received. SRC must use whatever means are necessary to protect workers and the public from exposure to radio frequency radiation in excess of the Commission's exposure guidelines. See 47 CFR § 1.1310.

This authority expires on **January 16, 2009**.

¹ KTCT is licensed for operation on 1050 kHz with 50 kW daytime and 10 kW nighttime, employing different directional antenna patterns during daytime and nighttime hours (DA-2-U). Application BP-19991223AAZ proposes an increase in nighttime power to 50 kW and changes to the nighttime directional pattern.

² BP-19991223AAZ; See Note 1.

STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, requests for extension of STA will be granted only where the licensee can show that one or more of the following criteria have been met:

- Restoration of licensed facilities is complete and testing is underway;
- Substantial progress has been made during the most recent STA period toward restoration of licensed operation; or
- No progress has been made during the most recent STA period for reasons clearly beyond the licensee's control, and the licensee has taken all possible steps to expeditiously resolve the problem.

Sincerely,



Charles N. Miller, Engineer
Audio Division
Media Bureau

cc: Susquehanna Radio Corporation