

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 TWELFTH STREET SW**  
**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
**HOME PAGE:** [www.fcc.gov/mb/audio/](http://www.fcc.gov/mb/audio/)

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October 21, 2010

Brendan Holland  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue NW Suite 200  
Washington, DC 20006-3402

Re: KLO Broadcasting Co.  
KLO(AM), Ogden, UT  
Facility Identification Number: 35069  
License application: BMML-20100329AFW

Dear Counsel:

After review of the subject license application, as amended on April 16, 2010, we have found the following deficiencies:

1. We have determined that the sampling system measurements were not performed in accordance with Section 73.151(c)(2)(i).<sup>1</sup> The determination of sampling line length should properly be based on the frequency closest to the carrier frequency at which open-circuit resonance is observed, that is, where zero reactance and low resistance is measured. The resonance frequencies occur at odd multiples of 90 electrical degrees, not at even multiples, as your exhibit indicates.
2. The description of measurements made at 45-degree offset frequencies to determine characteristic impedance must specify the frequency, resistance, and reactance for each measurement.<sup>2</sup> Section 73.155 of the Commission's rules requires stations licensed pursuant to a moment method proof to repeat the sampling system measurements at least once within each 24-month period. Therefore, the license application must document the initial sampling system measurements in sufficient detail to provide a basis for the periodic recertification.
3. The engineering exhibit does not include measurements of sampling line impedance with the loop connected, as the rule requires.

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<sup>1</sup> Measurements with a time-domain reflectometer are inadequate for this purpose.

<sup>2</sup> The characteristic impedance is the geometric mean of the impedances measured at +/- 45 degrees from the resonance frequency nearest carrier frequency, not the arithmetic mean, as your exhibit shows.

Further action on the subject license application will be withheld until the applicant submits an amendment addressing the deficiencies described above. Failure to respond within 60 days from the date of this letter may result in dismissal of the application pursuant to 47 CFR Section 73.3568(a)(1).

Sincerely,

A handwritten signature in blue ink that reads "Ann Gallagher". The signature is written in a cursive style with a large initial "A".

Ann Gallagher  
Audio Division  
Media Bureau

Cc: Keith Turcot