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2016 SEP 26 A 10: 59

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September 23, 2016

Accepted / Filed

VIA HAND DELIVERY

SEP 23 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: K273CT, Oxnard, California (Fac. Id. 143607)
Request for Waiver of Construction Permit Deadline

Dear Ms. Dortch:

This request for waiver of the construction permit deadline is filed on behalf of Gold Coast Broadcasting LLC ("Gold Coast") pursuant to 47 C.F.R. §1.3 of the Commission's rules, in accordance with footnote 36 of the Commission's *AM Revitalization First Report and Order*, released October 23, 2015 ("*First R&O*")¹ and *Modification Window Procedures Public Notice*, released October 26, 2015 ("*Procedure PN*").² Footnote 36 states that waivers of the Auction 83 FM translator construction deadlines are "presumptively in the public interest for applicants participating in one of the modification windows, provided that the AM station licensee proposing to use the FM translator for rebroadcasting its AM station commits to prompt FM translator station construction and initiation of broadcast operations."

Gold Coast holds a construction permit for FM translator K273CT, Oxnard, California (Fac. Id. 143607) (BMPFT-20160129AYL) (the "CP") that will expire on October 31, 2016. Gold Coast filed an application to modify the K273CT permit for use with AM station KUNX(AM), Santa Paula, California in the initial modification window announced by the *First R&O*.³ Gold Coast requests a six-month waiver of the October 31, 2016 construction deadline

¹ *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rulemaking and Notice of Inquiry, 30 FCC Rcd 12145 (2015).

² *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Public Notice, 30 FCC Rcd 14690 (MB 2015).

³ That application was granted on February 23, 2016. See FCC File No. BMPFT-20160129AYL.

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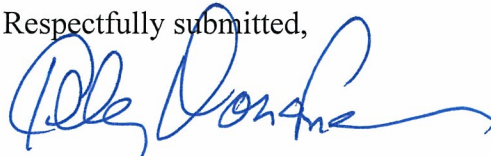
for the CP to enable it to realize service improvements for its AM station quickly. The requested time is needed because of the additional engineering complexity entailed in locating a translator antenna on an existing AM tower. Additionally, K273CT's authorized antenna is located on one of the towers of directional AM broadcast station KVTa, Ventura, California. KVTa is currently operating with reduced facilities under Special Temporary Authority ("STA") expiring on January 11, 2017 due to a defective controller board for its complex high powered 5 KW directional AM antenna array that has separate patterns day and night.⁴ Such boards are fabricated for each specific antenna array on a custom basis. KVTa installed a replacement board but it failed immediately. KVTa is still in the process of determining the cause of the repeated board outages and a new configuration for a second replacement board in order to complete the repair of its directional array within the term of its STA.

Special Operating Condition 2 of the K273CT construction permit requires a partial proof of performance of the KVTa antenna array before and after the K273CT antenna is installed to determine that the K273CT antenna will not adversely affect the performance of KVTa's antenna array. Such proofs of performance cannot be conducted prior to KVTa completing and testing the repair of its directional array pursuant to its STA. The requested extension of time is necessary to provide sufficient time for KVTa to complete the repair of its array and for K273CT to install and test its antenna and the repaired KVTa array as required in the K273CT construction permit.

Gold Coast commits to promptly construct the facilities authorized by the CP and commence broadcast operations, thereby satisfying the *First R&O's* requirement for this waiver request to be granted presumptively in the public interest. Grant of this waiver also would serve the public interest because it will allow Gold Coast to realize AM service improvements quickly and would further the FCC's effort to expand cross-service opportunities for AM stations.

Please do not hesitate to contact the undersigned with any questions or requests for additional information.

Respectfully submitted,



Kelly Donohue
Counsel to Gold Coast Broadcasting LLC

cc: Victoria McCauley (Via Email)

⁴ See FCC File No. BSTA-20160712AAC.