

FOR
FCC
USE
ONLY

FCC 302-AM
APPLICATION FOR AM
BROADCAST STATION LICENSE

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

SECTION I - APPLICANT FEE INFORMATION

1. PAYOR NAME (Last, First, Middle Initial)

Malkan Interactive Communications, LLC

MAILING ADDRESS (Line 1) (Maximum 35 characters)

2117 Leopard Street

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

Corpus Christi

STATE OR COUNTRY (if foreign address)

TX

ZIP CODE

78404

TELEPHONE NUMBER (include area code)

361-883-3516

CALL LETTERS

KEYS

OTHER FCC IDENTIFIER (If applicable)

FIN: 39715

2. A. Is a fee submitted with this application?

☒ Yes ☐ No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

☐

Governmental Entity

☐

Noncommercial educational licensee

☐

Other (Please explain):

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)

FEE TYPE CODE		

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$

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To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)

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(B)

0	0	0	1
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(C)

\$

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ADD ALL AMOUNTS SHOWN IN COLUMN C,
AND ENTER THE TOTAL HERE.
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED
REMITTANCE.

TOTAL AMOUNT
REMITTED WITH THIS
APPLICATION

\$

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SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Malkan Interactive Communications, LLC		
MAILING ADDRESS 2117 Leopard Street		
CITY Corpus Christi	STATE Texas	ZIP CODE 78408

2. This application is for:

- ☒ Commercial
 ☐ Noncommercial
☐ AM Directional
 ☒ AM Non-Directional

Call letters KEYS	Community of License Corpus Christi, TX	Construction Permit File No. BP-20200727AAD	Modification of Construction Permit File No(s).	Expiration Date of Last Construction Permit 10/7/2023
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

☒ Yes ☐ No

If No, explain in an Exhibit.

Exhibit No.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

☒ Yes ☐ No

If No, state exceptions in an Exhibit.

Exhibit No.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

☐ Yes ☒ No

If Yes, explain in an Exhibit.

Exhibit No.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

☐ Yes ☐ No

☒ Does not apply

If No, explain in an Exhibit.

Exhibit No.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☒ No

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

Exhibit No.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

☐ Yes ☒ No

Exhibit No.

If Yes, provide particulars as an Exhibit.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

CERTIFICATION

☒ Yes ☐ No

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name Hope Malkan	Signature <i>Hope Malkan</i>	Telephone Number 361-883-3516
Title Managing Membr	Date	

**WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR
CONSTRUCTION**

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant

Malkan Interactive Communications, L.L.C.

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)



Station License



Direct Measurement of Power

1. Facilities authorized in construction permit					
Call Sign KEYS	File No. of Construction Permit (if applicable) BP-20200727AAD	Frequency (kHz) 1440	Hours of Operation unlimited	Power in kilowatts	
				Night 1.0	Day 0.199
2. Station location					
State Texas			City or Town Corpus Christi		
3. Transmitter location					
State Texas	County Nueces	City or Town Corpus Christi		Street address (or other identification) 5200 Agnes	
4. Main studio location					
State TX	County Nueces	City or Town Corpus Christi		Street address (or other identification) 2117 Leopard Street	
5. Remote control point location (specify only if authorized directional antenna)					
State	County	City or Town		Street address (or other identification)	

6. Has type-approved stereo generating equipment been installed?



Yes



No

7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?



Yes



No



Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.

Exhibit No.

8. Operating constants:					
RF common point or antenna current (in amperes) without modulation for night system 0.57			RF common point or antenna current (in amperes) without modulation for day system 1.21		
Measured antenna or common point resistance (in ohms) at operating frequency Night 605 Day 605			Measured antenna or common point reactance (in ohms) at operating frequency Night +j173 Day +j173		
Antenna indications for directional operation					
Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents
	Night	Day	Night	Day	Night Day
Manufacturer and type of antenna monitor:					

SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator Guyed Uniform Vertical	Overall height in meters of radiator above base insulator, or above base, if grounded. 84.4	Overall height in meters above ground (without obstruction lighting) 85.4	Overall height in meters above ground (include obstruction lighting) 85.9	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. Exhibit No.
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Excitation



Series



Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	27°	47'	02"	West Longitude	97°	27'	29"
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

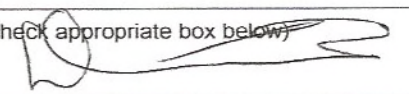
Antenna and feedline for K254DH was installed before measuring KEYS

See "Exhibit for KEYS (AM)

11. Give reasons for the change in antenna or common point resistance.

Rebuild of ground system & install of K254DH

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) David Stewart	Signature (check appropriate box below) 
Address (include ZIP Code) c/o KPET Radio P O Box 1188 Lamesa, Texas 79331	Date 1/12/2021 Telephone No. (Include Area Code) 214-998-2830



Technical Director



Registered Professional Engineer



Chief Operator



Technical Consultant



Other (specify)

Exhibit for KEYS (AM)

302-AM License to cover Construction Permit BP-20200727AAD

Malkan Interactive Communications LLC holds Construction Permit BP-20200727AAD. KEYS is licensed to operate 1,000 watts all hours with a non-directional day antenna and four tower night antenna. The Directional Antenna system has been of concern for some time, operating at variance under STA. The CP authorizes changes to night operation; power will be reduced to 199 watts using the same tower as days. The three now unused towers are detuned. Pandemic restrictions make it hard to schedule tower removal. Detuning will be maintained as long as the towers are standing.

No specific changes were needed at the towers to implement the KEYS permit. However, translator CP BNPFT-20180419AAJ for K254DH was installed at the same time. K254DH uses an antenna and feed line on the KEYS tower; these were carefully bonded at regular intervals. A Kintronic Isocoupler crosses the tower base. With the fairly high base impedance of KEYS (and dplexed tenant) KSIX special steps were taken to avoid disturbing the status quo. Delta Electronics Operating Impedance Bridge and Array Solutions Power AIM-120 quantified the base readings for each tower, tuning box and filter unit. Once the Translator antenna, lines and isocoupler were in place, the elements that appear across the base were carefully adjusted to maintain the base impedances. A spectrum analyzer was used to verify the AM isolation networks worked properly and no new spurs came with the translator.

Day power is unchanged from the current license (BZ-20090722ACN) at 1,000 watts nominal and 892 watts (0.892 Kw and 1.21 Amps day current into 605 ohms) actual input.

Night power is 199 watts (0.199 Kw and 0.57 Amps night current into 605 ohms)

Special operating conditions or restrictions:

One) Permittee shall install a type accepted transmitter, or submit application (FCC Form 301) along with data prescribed in Section 73.1660(b) should non-type accepted transmitter be proposed. Acknowledged: Applicant uses a Gates One 1,000 watt transmitter.

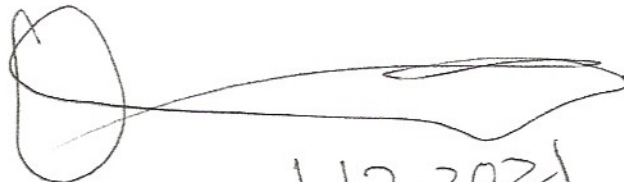
Two) A license application (FCC Form 302) to cover this construction permit must be filed with the Commission pursuant to Section 73.3536 of the Rules before the permit expires. Acknowledged: The CP expires in October 2023. This exhibit supports the 302-AM.

Three) Licensee shall be responsible for satisfying all reasonable complaints of blanketing interference within the 1 V/m contour as required by Section 73.88 of the Commission's rules. Acknowledged: The new night operation is the licensed day system using the same equipment at reduced power. We do not expect trouble but will deal with all reasonable complaints.

Four) Ground system consists of 120 equally spaced, buried, copper radials about the base of each tower, each 65.24 meters in length except where intersecting radials are shortened and bonded to a transverse copper strap midway between adjacent towers, plus a copper ground screen 14.6meters square, about the base of each tower. Acknowledged.

This application was compiled from data from FCC CDBS and from applicant and is accurate to the best of my knowledge. In case of question, please contact...

David Stewart
Moving Target Consulting Works
214-998-2830
David@MovingTarget.Consulting



1-12-2021