



January 21, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Request for STA to Permit FM Translator to Rebroadcast AM Station
Programming: KRXR(AM), Gooding, ID (FCC Facility ID No.: 2805) and FM
Translator K268BP, Mountain Home, ID (FCC Facility ID No.: 87708)**

Dear Ms. Dortch:

The purpose of this letter is a request for an STA to allow our client, Maria Elena Juarez, programming of KRXR(AM), to be broadcast on FM translator K268BP¹, pending the outcome of the current FCC rulemaking proceeding (RM-11338) in which a change in the FCC's rules is being contemplated that will allow the programming of AM stations to be rebroadcast by FM translators.

At the present time, the Sections 74.1201(a), 74.1201(d), 74.1231, 74.1232 and 74.1284(c) specifically limit the permissible programming service of an FM translator station to the rebroadcast of certain FM broadcast stations that meet the eligibility requirements in Part 74 of the Commission's rules. The public interest would be well served by a grant of this STA request pending a permanent change in the rules to allow for AM stations to be rebroadcast on FM translators under certain conditions.

As shown in the attached exhibit, the K268BP 60 dBμ contour is completely contained within the KRXR(AM) 2 mV/m contour and within a 25 mi radius of the transmit site. KRXR(AM) is the only one of two full power radio stations licensed to Gooding, ID. KRXR(AM) provides coverage of local news and sports and provides

¹ Assuming that the Commission grants this STA request, K268BP will make arrangements with the licensee of KRXR (AM) for a rebroadcast of KRXR (AM).

employment to local citizens who provide this unique programming to the community of Gooding, ID.

Unfortunately, KRXR(AM) has a signal of only 93 watts nighttime power which is extremely limited in reaching people in its interference-free contour, which covers only about 5,546 people in the Gooding area. This is a decrease of 12,675 persons compared to the daytime coverage area. Allowing for a rebroadcast of KRXR(AM) directly on the K268BP Mountain Home translator, day and night however, would provide 60 dBμ additional service to nearly 15,575 people in the vicinity of Gooding reaching in conjunction with the nighttime coverage of KRXR 100 percent of Gooding and Jerome, ID where the significant concentration of population depends upon KRXR(AM) for local information and service.

By granting an STA for KRXR(AM) to be carried on FM translator K268BP, nighttime service for KRXR(AM) would be brought to over 21,121 people.

The requested STA is temporary in nature and is requested to extend only until the Commission's final decision in RM-11338. Should that decision ultimately not allow the rebroadcast of programming of AM stations on FM translators, K268BP will immediately cease the carriage of KRXR(AM) on K268BP.

This STA request, when considered on a public interest basis, has only benefits and no detriments. The community of Gooding, ID and the surrounding area will be better served by the more consistent reception of KRXR(AM). No longer when the sun goes down will approximately 16,000 people in the KRXR(AM) service area be denied service from KRXR(AM). It is in the public interest for the Commission to fashion its rules and to grant STA's so that the public, as much as possible, is able to listen to the radio stations the public wishes to listen to, when the public wishes to listen to them. The grant of the STA requested in this letter will enhance the image of the Commission as a vigorous agency that takes public interest considerations to heart with quick action.

The foundation of America's superb system of broadcasting is its AM broadcast stations. While the structure of broadcasting has seen much growth in its 80 or so years of existence, service to many communities, particularly communities like Gooding, ID, are dependent upon its AM radio stations. The Commission should do all it can to ensure that the programming provided by KRXR(AM) may be received by the public in as technically consistent and interference-free manner as possible both day and night. This may be achieved by allowing KRXR(AM) to be rebroadcast on the K268BP FM translator day and night.

I Gene Wisniewski certify that no party to this STA request is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

If we can provide any additional information regarding this important waiver request, please contact me directly.

Sincerely,

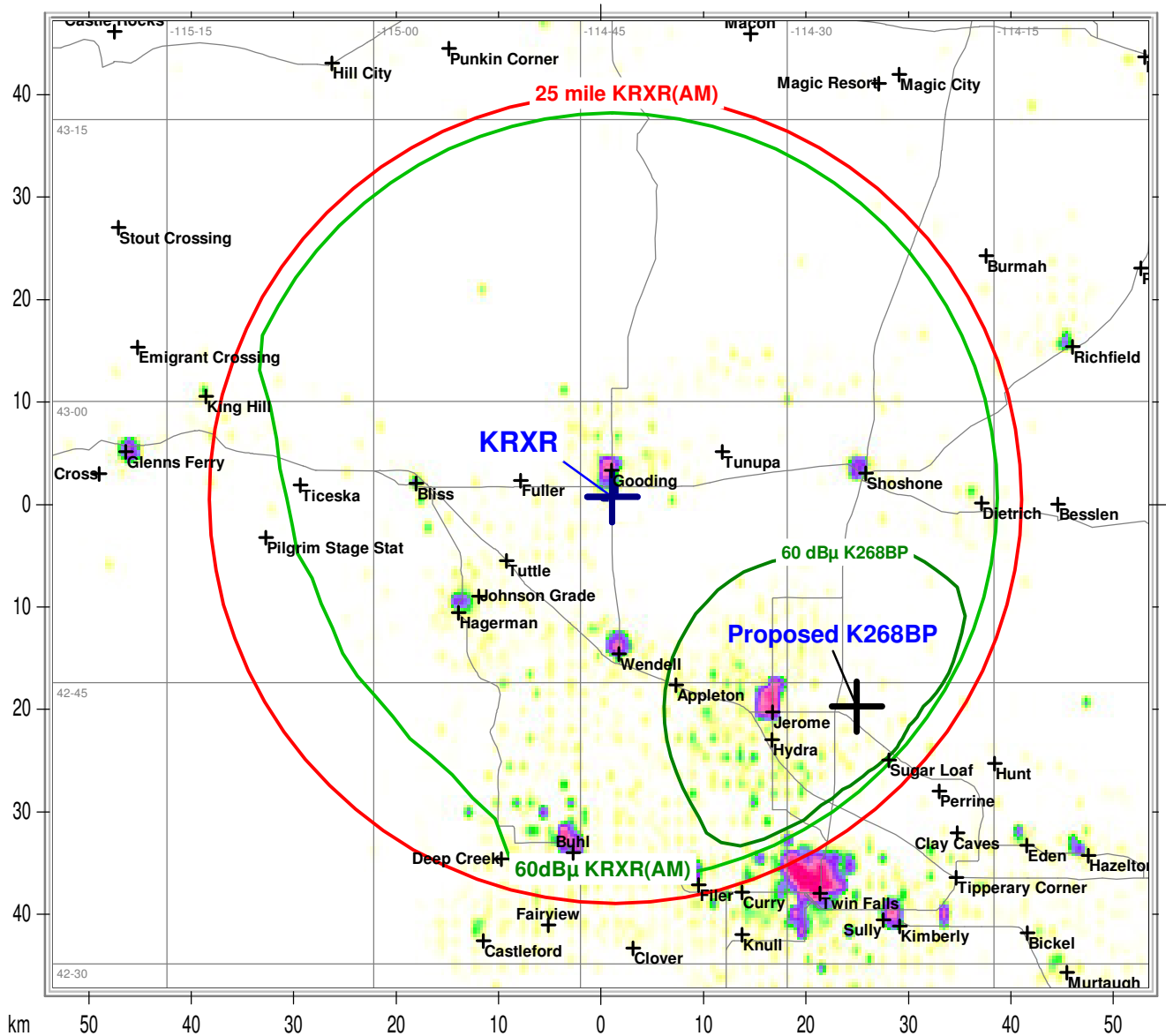
A handwritten signature in black ink that reads "Gene Wisniewski". The signature is written in a cursive style with a large, stylized "G" at the beginning.

Gene Wisniewski

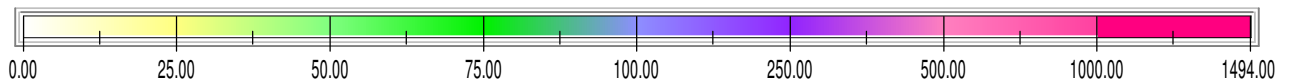
Consulting Engineer

Enclosure

Translator K268BP, Mountain Home, ID FAC# 87708 and Primary KRXR(AM)



ASR# 1041029, 46m,250W, channel 267, Directional, KRXR(AM)



National Borders State Borders Highways Lat/Lon Grid