

JUSTIFICATION FOR SILENT STA EXTENSION

Gold Coast Broadcasting LLC ("Gold Coast") hereby requests an extension of its silent STA for AM Station KKZZ (formerly KUNX), Port Hueneme, CA (FAC ID: 25091), so that on-going repairs to the transmission system can be completed more efficiently and expeditiously.

KKZZ has been silent since January 21, 2015. In its first silent STA request filed at that time, Gold Coast reported that after extensive repairs to the station's operating system, when Gold Coast tried to power the day and night antenna systems, the station's transmitter kept failing. As a result, the transmitter required its own extensive and time-consuming repairs. The failures had two causes: misinformation from the manufacturer's customer service representatives and a number of serious issues with the antenna system that caused active RF components in the transmitter to fail. The daytime pattern still would not present the required 50-ohm load causing the transmitter to fail when the pattern switching system switched the station from nighttime to daytime operation. Gold Coast determined that it would be faster and more efficient to complete repairs and subsequent adjustments of the phasor and antenna tuning units (ATUs) with the station off the air. Accordingly, Gold Coast requested this silent STA.

When Gold Coast could not get the transmitter to power the antenna system without failing after inspection of the phasor and the ATUs, its broadcast engineers began inspecting the RF transmissions lines to the three towers. They discovered that two of the day and night transmission lines to the three-tower array had been damaged because they had been installed by previous ownership without conduit and at an inadequate depth. All six lines from the transmitter building to the three towers were then excavated. Major physical damage was found likely caused by disc harrow cultivation by the farming tenant. The broadcast engineers also discovered that the buried conduit containing multiple control and power wires was cracked in many places and full of water and dirt. Gold Coast proceeded to replace all RF transmission lines in suitable conduit in deeper trenches and control and power wires run in new conduit for added protection. The extensive and time-consuming replacement of the lines and wires has now been completed; however, the new trenches will not be filled in until the station is operating properly in case issues are discovered with the phase monitor sample lines.

Almost all of the 120 radials in the ground system for each tower and many radials intersected by the trenches had to be temporarily disconnected from the towers in order to replace the transmission lines and the control and power wires. These radials are currently being reconnected, one at a time, and brazed with silver solder per proper engineering practice. At the same time, Gold Coast broadcast engineers are also re-checking the physical condition and electrical properties of all of the inductors, capacitors and connections in the day and night phasor cabinets and the three ATUs. When all of these repairs have been completed, the broadcast engineers will again test the transmission and antenna systems and, in the process, make certain that the ATUs and phasors are tuned per licensed values.

Given the very comprehensive nature of the repairs made to the station so far, Gold Coast is optimistic that the operational problems that have been plaguing the station are nearly solved. To this end, Gold Coast respectfully submits that an extension of its silent STA will permit its broadcast engineers to complete the repair process and, thereby, return the station to operation with its daytime and nighttime patterns in compliance with its licensed parameters.