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KK Broadcast Engineering

SPECIAL TEMPORARY AUTHORIZATION REQUEST EXHIBIT 13

February 6, 2010

Call: KWAM-AM
Frequency: 990khz
Facility ID: 35873
Location: Memphis, TN

Kevin C. Kidd, CSRE/AMD, has been retained by KWAM to file this STA request and perform certain other engineering tasks.

Kevin C. Kidd, CSRE/AMD is the principle engineer and owner of KK Broadcast Engineering with offices in Lawrenceburg, TN. I am an SBE Certified Senior Radio Engineer with AM Directional endorsement. I have successfully filed numerous applications and documents with the Commission.

This office has been authorized by Legacy Media – Memphis, LLC to prepare this statement in support of a request for Special Temporary Authority (STA) to operate KWAM Non-Directional (ND) from a single tower of the currently licensed array.

KWAM operates as a DA2 with one tower shared between patterns. The array stands in the flood plain on the west bank of the Mississippi River. The base insulators of all towers are elevated approximately 20ft above grade level to protect the base and tuning equipment from floodwaters. The center (shared) tower and platform structure has developed structural problems and must be replaced. The condition of the tower precludes repair or disassembly and must be simply cut down before it fails catastrophically. Other site work and equipment installation/modification is planned concurrently with the tower replacement.

This STA request is being filed in preparation of the tower demolition. The array will be changed to ND as soon as possible and the damaged tower dropped soon thereafter. ND operation will be instituted from one of the existing array 73° tall towers.

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We hereby respectfully request that KWAM be granted an STA for Non-Directional operation at 25% of licensed power for the duration of the construction phase and additionally to operate at variance to licensed perimeters following construction during the tune-up and proofing phase. The array will only be returned to DA operation after the array is substantially tuned and operating near its licensed perimeters.

Following construction, the array will be proofed using conventional field measurements.

Total time to return to licensed perimeters is anticipated to be 180 days. However, site, weather and flood conditions may delay work for undeterminable lengths of time and require extension beyond 180 days. Since KWAM will be operating with significantly reduced market coverage, we will be making every effort to return to full power licensed operation as soon as possible while maintaining a safe working environment.

During the period of ND operation KWAM will operate at 25% licensed DA power but will further reduce power if interference complaints are received.

Later, during the period of DA operation with perimeters at variance, KWAM will reduce power to maintain monitor points below licensed maximum.

Similarly, KWAM will reduce power if needed to limit worker exposure or maintain compliance with the Commissions rules at any time.

If further information is needed please contact me. 931-766-2999 or fcc@kkbc.com.

Sincerely,



Kevin C. Kidd, CSRE/AMD
KK Broadcast Engineering