



WASHINGTON, D.C. OFFICE
 flour mill building
 1000 potomac street nw
 suite 200
 washington, d.c. 20007-3501
 TEL 202 965 7880 FAX 202 965 1729

anchorage, alaska
 beijing, china
 new york, new york
 portland, oregon
 seattle, washington
 GSBLAW.COM

GARVEY SCHUBERT BARER

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to BRAD C. DEUTSCH
 mvirtue@gsblaw.com TEL EXT 1793

February 23, 2016

ORIGINAL

Our File No. 21110-00100

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
 Federal Communications Commission
 Office of the Secretary
 445 12th Street, S.W.
 Room TW-A325
 Washington, DC 20554

Accepted/Files

FEB 23 2016

Federal Communications Commission
 Office of the Secretary

2016 FEB 24 A 11:30

Re: ***Request for Extension of Special Field Test Authorization***
FCC File No. 20150826ACA
 WGFP(AM), Webster, MA
 Facility ID No. 50232
Just Because, Inc.

Dear Ms. Dortch:

Transmitted herewith on behalf of Just Because, Inc., licensee of Station WGFP(AM), Webster, Massachusetts, is a request for an extension of the above-referenced Special Field Test Authorization filed pursuant to Section 73.1515 of the Commission's rules, 73 C.F.R. § 73.1515.

Should you have any questions regarding this matter, kindly communicate directly with this office.

Very truly yours,

Brad Deutsch

Attachments

cc: Son Nguyen, Audio Division, MB (via email son.nguyen@fcc.gov)
 Susan Crawford, Audio Division, MB (via email susan.crawford@fcc.gov)



WGFP Radio
Just Because, Inc.
27 Douglas Road
Webster, MA 01570
508 943-9400, 508 943-0405 fax

February 23, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: ***Request for Extension of Special Field Test Authorization***
FCC File No. 20150826ACA
WGFP(AM), Webster, MA
Facility ID No. 50232
Just Because, Inc.

Dear Ms. Dortch:

Just Because, Inc. (“Just Because”), licensee of Station WGFP(AM), Webster, Massachusetts (the “Station”), pursuant to Section 73.1515 of the Commission’s rules, 73 C.F.R. § 73.1515, hereby requests a 180-day extension of the Special Field Test Authorization for a high efficiency broadband antenna (“HEBA”) that was granted on September 10, 2015 (FCC File No. 20150826ACA) (the “SFTA”). The technical parameters of the SFTA have not changed from what was provided in the original request dated August 26, 2015 (attached as Exhibit 1) and the supplement dated August 31, 2015 (attached as Exhibit 2).

Since the Commission granted the SFTA on September 10, 2015 (attached as Exhibit 3), Just Because has constructed the temporary facilities authorized in the Special Temporary Authority granted on October 29, 2015, which authorized the Station to operate from a cylindrical base insulated monopole component of the HEBA authorized in the SFTA (FCC File No. BSTA-20150826ABJ, attached as Exhibit 4).

Although Just Because broke ground for the initial construction of the HEBA prototype in September, the geographic location of the Station presented a number of challenges, including wetlands on two sides of the antenna location, as well as multiple underground aquifers and a residential area on a third side. Nevertheless, by October, the underground aquifer and cable re-routing issues had been resolved and the concrete bases for the platform legs were installed as shown in the following photos:



Platform Base Sonotubes Installed Near Transmitter Bldg.



Center Base for the HEBA E-Cylinder

In November, fabrication of all 26 subassemblies of the HEBA platform was completed and the disassembled platform components were delivered to the Station location.



Platform Subassemblies

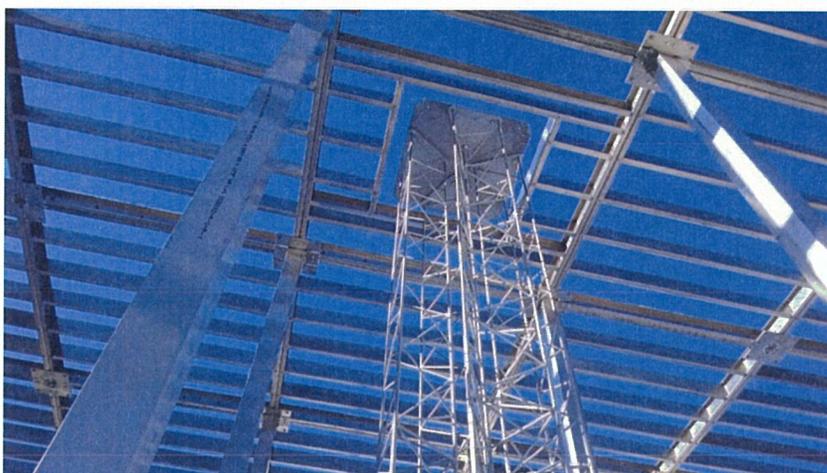


HEBA Platform Components Ready for Assembly at the Station

In December, construction of the HEBA platform at the Station location was completed and in January, the HEBA E-Cylinder support column was assembled and installed.



Assembly of the HEBA platform



HEBA E-Cylinder Support Column Installed

Finally, earlier this month, the first layer of several layers of the platform (plywood, insulation adhesive, vapor barrier, copper sheet and rubber (EPDM)) were installed.

Phasetek in Pennsylvania is currently in the final stages of fabrication and sub-assembly of the E-Cylinder itself, as well as the D-Plate and the Antenna Tuning Units, with final stages of assembly and wiring anticipated to take place as soon as weather will permit.

Although Just Because has made significant progress with this project, the fabrication process has taken longer than initially anticipated because of the unique nature of the HEBA design. Nevertheless, Just Because is confident that the final assembly process will be completed, along with the necessary testing, within the next 180-days.

Accordingly, Just Because hereby respectfully request a 180-day extension of the above-referenced SFTA.

No filing fee is required for this extension request.

Please direct any questions relating to this request to our legal counsel, Brad Deutsch, at (202) 298-1793 or bdeutsch@gsblaw.com.

Applicant hereby certifies that neither the applicant nor any party to the application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

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

Respectfully submitted,

Just Because, Inc.

By 
Barry Sims
President

Attachments

GSB:7553477.1



WASHINGTON, D.C. OFFICE
flour mill building
1000 potomac street nw
suite 200
washington, d.c. 20007-3501
TEL 202 965 7880 FAX 202 965 1729

anchorage, alaska
beijing, china
new york, new york
portland, oregon
seattle, washington
GSBLAW.COM

GARLEY SCHUNBERG BAKER

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to BRAD C. DEUTSCH
mvirtue@gsblaw.com TEL EXT 1793

August 26, 2015

STAMP & RETURN

Our File No. 21110-00100

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Accepted / Filed

AUG 26 2015

Federal Communications Commission
Office of the Secretary

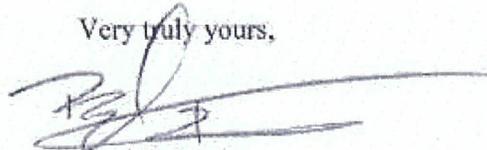
Re: ***Request for Special Field Test Authorization***
WGFP(AM), Webster, MA
Facility ID No. 50232
Just Because, Inc.

Dear Ms. Dortch:

Transmitted herewith on behalf of Just Because, Inc., licensee of Station WGFP(AM), Webster, Massachusetts, is a request for Special Field Test Authorization filed pursuant to Section 73.1515 of the Commission's rules, 73 C.F.R. § 73.1515.

Should you have any questions regarding this matter, kindly communicate directly with this office.

Very truly yours,



Brad Deutsch

Attachments

cc: Son Nguyen, Audio Division, MB (via email son.nguyen@fcc.gov)
Susan Crawford, Audio Division, MB (via email susan.crawford@fcc.gov)



WGFP Radio
Just Because, Inc.
27 Douglas Road
Webster, MA 01570
508 943-9400, 508 943-0405 fax

August 26, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: ***Request for Special Field Test Authorization***
WGFP(AM), Webster, MA
Facility ID No. 50232
Just Because, Inc.

Dear Ms. Dortch:

Just Because, Inc. ("*Just Because*"), licensee of Station WGFP(AM), Webster, Massachusetts (the "Station"), pursuant to Section 73.1515 of the Commission's rules, 73 C.F.R. § 73.1515, hereby requests Special Field Test Authorization for a high efficiency broadband antenna ("HEBA").

Following the success of the co-located experimental HEBA operation on 1630 kHz,¹ *Just Because* would now like to construct and conduct field strength surveys on a HEBA antenna operating at 940 kHz in anticipation of filing a construction permit application on FCC Form 301 for the Station to use a non-standard HEBA antenna on a permanent basis. Detailed information regarding this request is included in the attached Engineering Report prepared by Charles A. Hecht and Associates.

Concurrently with this request, *Just Because* is also filing a request for Special Temporary Authority in order to continue to operate the Station from a monopole component of the HEBA that is the subject of this request for Special Field Test Authorization.

¹ The Call Sign of the Experimental Broadcast Station was WX3CFA. See File No. BPEX-20130402ACY.

No filing fee is required for this request.

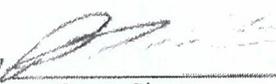
Please direct any questions relating to this request to our legal counsel, Brad Deutsch, at (202) 298-1793 or bdeutsch@gsblaw.com.

Applicant hereby certifies that neither the applicant nor any party to the application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

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

Respectfully submitted,

Just Because, Inc.

By 

Barry Sims
President

Attachment

CHARLES A. HECHT & ASSOCIATES, INC.
BROADCAST ENGINEERING CONSULTANTS

ENGINEERING REPORT COVERING
REQUEST FOR SPECIAL FIELD TEST AUTHORITY
ON BEHALF OF JUST BECAUSE, INC.
FOR 940 KILOHERTZ
WEBSTER, MASSACHUSETTS

AUGUST 2015

ENGINEERING REPORT COVERING
REQUEST FOR SPECIAL FIELD TEST AUTHORITY
ON BEHALF OF JUST BECAUSE, INC.
FOR 940 KILOHERTZ
WEBSTER, MASSACHUSETTS

SUMMARY

This engineering report is submitted on behalf of Just Because, Inc. (hereinafter referred to as "Just Because") in support of a request for Special Field Test Authority (SFTA) pursuant to Section 73.1515 of the Commission's rules. Just Because is the licensee of AM station WGFP Webster, Massachusetts. WGFP is licensed to operate with a non-directional antenna on a frequency of 940 kilohertz with power of 1 kilowatt daytime and .004 kilowatts nighttime.

The purpose of the SFTA is to request construction and operation of a high efficiency broadband antenna ("HEBA") operating on WGFP's licensed frequency at the WGFP site. Just Because previously constructed and tested a co-located experimental HEBA operation on 1630 kilohertz.¹ Just Because now seeks to construct and conduct field strength surveys on a HEBA antenna operating at 940 kilohertz in anticipation of filing a construction

¹ Call sign WX3CFA. See File No. BPEX-20130402ACY.

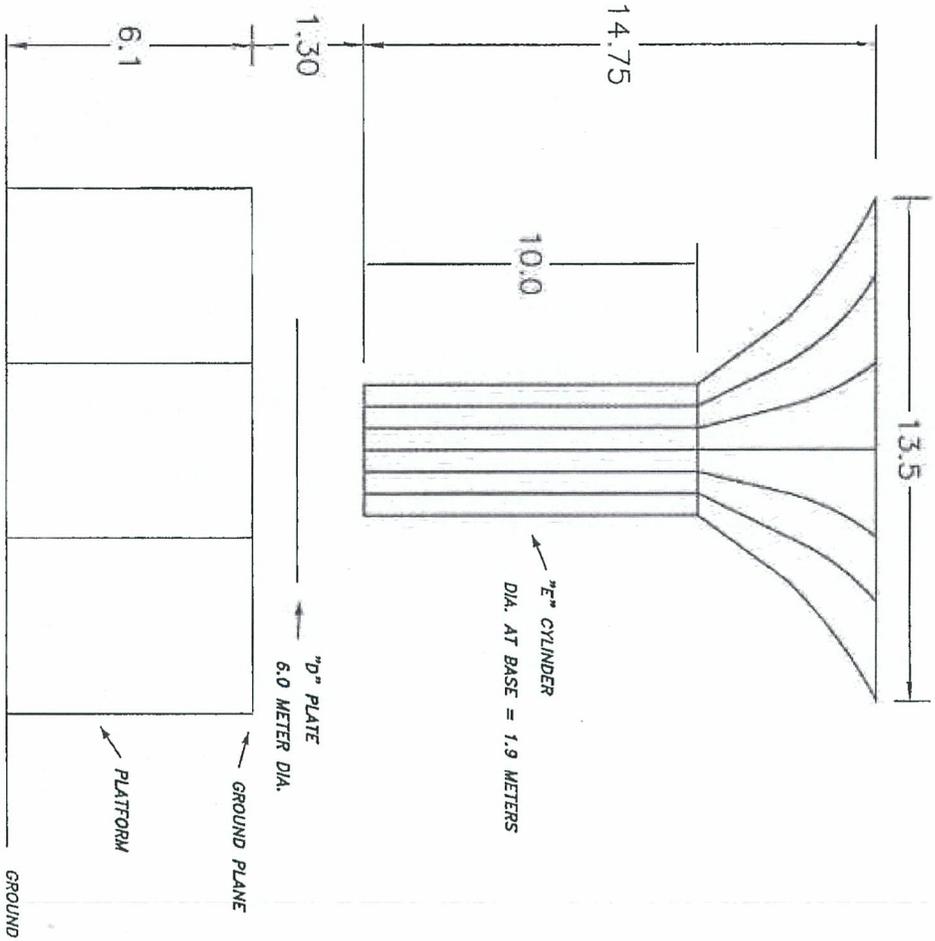
permit application on FCC Form 301 for the station to use the HEBA antenna on a permanent basis.

Power will not exceed the licensed daytime power of 1 kilowatt. The proposed antenna is non-directional and operation will be limited to daytime hours only. A report will be provided to the Commission upon conclusion of the SFTA operation. Technical details of the proposed HEBA are provided in the model provided with this report.

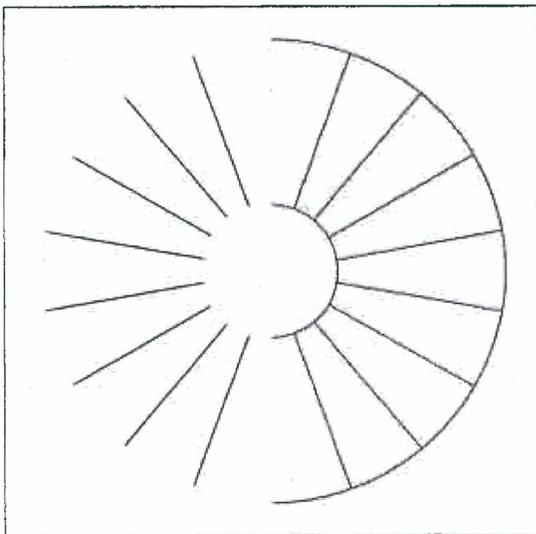
CONCLUSION

The Just Because proposal for SFTA is compliant with Section 73.1515 of the FCC rules and regulations. It is respectfully requested that this request be granted.

ELEVATION VIEW



TOP VIEW



NOTE: ALL DIMENSIONS ARE IN METERS

DRAWN BY KRG	DATE 12/27/13	PHASETEK INC. 550 CALIFORNIA RD. QUAKERTOWN, PA. 18951	SCALE NONE	SIZE B	TRNG. NO. P2001183
ENGINEER			TITLE PROPOSED HERBA ANTENNA 940 KHZ	SHEET 1 OF 1	
APPRO. [Signature]					



WASHINGTON, D.C. OFFICE
flour mill building
1000 potomac street nw
suite 200
washington, d.c. 20007-3501
TEL 202 965 7880 FAX 202 965 1729

anchorage, alaska
beijing, china
new york, new york
portland, oregon
seattle, washington
GSBLAW.COM

GARVEY SCHUBERT BARER

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to BRAD C. DEUTSCH
bdeutsch@gsblaw.com TEL EXT 1793

August 31, 2015

Our File No. 21110-00100

VIA EMAIL

Ms. Susan Crawford
susan.crawford@fcc.gov
Media Bureau, Audio Division
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***Request for Special Field Test Authorization***
FCC File No. 20150826ACA
WGFP(AM), Webster, MA
Facility ID No. 50232
Just Because, Inc.

Dear Ms. Crawford:

On behalf of Just Because, Inc., licensee of Station WGFP(AM), Webster, Massachusetts, we hereby supplement the above-referenced Request for Special Field Test Authorization ("SFTA") to provide additional technical details in the attached Supplemental Engineering Report and to request that the Commission grant the SFTA for an initial 180-day period in order to allow sufficient time to complete construction and conduct testing of the proposed antenna system.

Should you have any questions regarding this matter, kindly communicate directly with this office.

Very truly yours,

Brad Deutsch

Attachment

cc: Son Nguyen, Audio Division, MB (via email son.nguyen@fcc.gov)

SUPPLEMENT TO ENGINEERING REPORT COVERING
REQUEST FOR SPECIAL FIELD TEST AUTHORITY
ON BEHALF OF JUST BECAUSE, INC.
FOR 940 KILOHERTZ
WEBSTER, MASSACHUSETTS

AUGUST 2015

SUPPLEMENT TO ENGINEERING REPORT COVERING
REQUEST FOR SPECIAL FIELD TEST AUTHORITY
ON BEHALF OF JUST BECAUSE, INC.
FOR 940 KILOHERTZ
WEBSTER, MASSACHUSETTS

STATEMENT

This engineering statement is submitted on behalf of Just Because, Inc. (hereinafter referred to as "Just Because") to supplement a request for Special Field Test Authority (SFTA) pursuant to Section 73.1515 of the Commission's rules. Just Because is the licensee of AM station WGFP Webster, Massachusetts. Just Because seeks permission to construct a high efficiency broadband antenna ("HEBA") at the WGFP site. WGFP is licensed to operate with a non-directional antenna on a frequency of 940 kilohertz with power of 1 kilowatt daytime and .004 kilowatts nighttime.

The purpose of the supplement is to provide additional technical data for the proposed antenna, including the coordinates of the proposed operation, a description of the HEBA and the estimated efficiency of the antenna.

TECHNICAL DATA

The coordinates of the proposed antenna site are: 42° 03' 17" N; 71° 49' 59" W (NAD 27). A description of the HEBA is attached. Since the goal of this project is to construct an antenna that meets FCC minimum efficiency standards, the estimated HEBA efficiency is 282 mV/m/km.

DECLARATION

The foregoing was prepared by or under the immediate supervision of Charles A. Hecht of Charles A. Hecht & Associates, Inc., Freehold, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. All statements herein are true and correct of his knowledge except such statements made on information and belief, and as to those statements, he believes them to be true and correct under the penalty of perjury.

Respectfully submitted,

/s/

Charles A. Hecht
Charles A. Hecht & Associates, Inc.
19 Mackenzie Court
Freehold, New Jersey 07728
(732) 577-0711
August 31, 2015

HEBA ANTENNA

BY KURT GORMAN

ABSTRACT

Construction and tuning will be performed to permit use of a High Efficiency Broadband Antenna (HEBA) in the medium wave broadcast band. These antennas utilize (2) two elements to produce electric and magnetic fields individually. The overall vertical heights are typically less than 5% of the operating electrical wavelength.

CONSTRUCTION

The HEBA is constructed with (2) two elements. A tapered cylinder (E Cylinder) generates the electric field and a metallic disc (D Plane) generates the magnetic field. These elements are spaced above a conductive ground plane. The ground plane is also attached to Earth ground via copper strapping.

ANTENNA FEED ARRANGEMENT

The HEBA elements are electrically excited separately by means of a power dividing / phasing RF circuit. This circuitry consists of impedance matching of each element's coupled impedance to provide equal transmitted power in each element while maintaining proper element electrical phase relationship. Additional input circuitry matches the parallel input impedance feeding each element to the characteristic impedance of the main transmitter field line (typically 50 Ohms).

TUNING

Proper excitation of the HEBA elements will generate an outward poynting vector

$S = E \times H$. E represents the time varying electric field and H represents the time varying magnetic field. The time phase relationship of these fields in the interaction zone near the antenna provide the ratio of $E / H = Z$ (free space). The time phasing of both fields is adjusted to provide maximum radiated field at angles close to the ground.

PERFORMANCE

Proper adjustments of the HEBA at medium wave broadcasting frequencies (500-1700kHz) yields radiated fields considerably higher than that of a monopole antenna of a similar height.

Also, the input impedance and bandwidth are a function of the antenna tuning; this can be optimized for various frequencies. This is not possible with a conventional monopole antenna.

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET, SW
WASHINGTON, DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

PROCESSING ENGINEER: Susan N. Crawford
TELEPHONE: (202) 418-2754
GROUP FACSIMILE: (202) 418-1411
INTERNET ADDRESS: Susan.Crawford@fcc.gov

September 10, 2015

Brad C. Deutsch, Esq.
Garvey Schubert Barer
1000 Potomac Street, NW
Suite 200
Washington, DC 20007-3501

Re: WGFP(AM), Webster, Massachusetts
Just Because, Inc.
Facility Identification Number 50232
File No. 20150826ACA

Request for Special Field Test Authorization

Dear Counsel:

The staff has under consideration the request for a Special Field Test Authorization ("SFTA") filed on August 26, 2015, on behalf of Just Because, Inc. ("JBI"), licensee of Station WGFP(AM), Webster, Massachusetts,¹ and supplemented at the request of Commission staff on August 31, 2015. JBI requests the SFTA pursuant to Section 73.1515 of the Commission's Rules² to construct and operate a High Efficiency Broadband Antenna ("HEBA")³ on 940 kHz at a location within the licensed Station

¹ File Number BL-19830127AE. Station WGFP(AM) is a Class D AM station authorized to operate on 940 kilohertz ("kHz") using a non-directional antenna and 1.0 kilowatt (kW) nominal power daytime and 0.004 kW nominal power nighttime, at a transmitter site described by geographic coordinates 42° 03' 17" North Latitude, 71° 50' 00" West Longitude, referenced to 1927 North American Datum ("NAD 27").

² 47 C.F.R. § 73.1515.

³ The HEBA, a non-standard antenna for AM broadcast use, is manufactured by WorldWide Antenna Systems LLC and consists of a tapered cylinder that generates an electric field and a metallic disc that generates a magnetic field. These elements are mounted on a non-conductive platform and excited separately. Beneath the antenna and attached to the platform under it, is a 36 feet by 36 feet conductive ground plane consisting of copper sheathing, approximately .020 inches thick. Copper strap extends from the sheathing to ground rods along the perimeter of the platform supports. At that point, copper strap extends to the transmitter and matching circuitry. A HEBA was previously constructed and operated at the Station WGFP(AM) transmitter site on 1630 kHz pursuant to experimental authority BPEX-20130402ACY.

WGFP(AM) transmitter site.⁴ JBI requests the SFTA to take field strength measurements pursuant to Section 73.186 of the Commission's Rules⁵ to evaluate the performance and determine the efficiency of the HEBA on 940 kHz. If the antenna performs as predicted, the data obtained pursuant to the SFTA will subsequently provide the basis for and be submitted as part of a minor change application requesting modification of the licensed Station WGFP(AM) facilities to permit permanent use of the HEBA antenna.

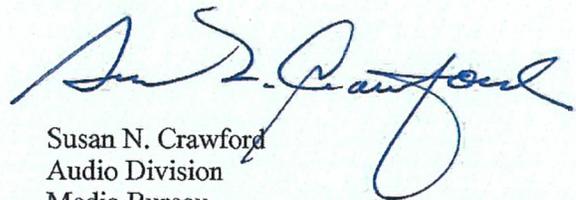
Our review indicates that the proposed SFTA operation is not likely to cause interference to any existing station. Accordingly, the JBI request for SFTA **IS HEREBY GRANTED**. Call sign WX1GFP is assigned to the proposed test station. Station WX1GFP may operate during daytime non-critical hours only with the following facilities:

Frequency:	940 kHz
Hours of operation:	Non-critical daytime hours only
Mode of operation:	Non-directional
Antenna:	HEBA
Geographic coordinates:	42° 03' 17" NL; 71° 49' 59" WL (NAD 27)
Radiator height:	22.2 meters (including platform)
Operating power:	Not to exceed 1 kW
Antenna efficiency:	282 mV/m/km/kW ⁶

Transmissions shall consist of an unmodulated carrier plus hourly voice station identification announcements. A report, detailing the methodology employed, the test results obtained and the analysis thereof, must be submitted to the Commission within 60 days following the conclusion of the authorized SFTA operation pursuant to Section 73.1515(c)(7) of the Commission's Rules.⁷ It will be necessary to reduce power or cease operation of the authorized SFTA facilities if complaints of interference are received. Additionally, it will be necessary to reduce power or cease operation of the authorized SFTA facilities to protect persons having access to the site from radiofrequency radiation in excess of FCC maximum permissible exposure limits.

This SFTA expires **March 8, 2016**.

Sincerely,



Susan N. Crawford
Audio Division
Media Bureau

cc: Charles A. Hecht (via email)

⁴ The proposed location of the SFTA antenna is described by geographic coordinates 42° 03' 17" North Latitude, 71° 49' 59" West Longitude, referenced to NAD 27.

⁵ 47 C.F.R. § 73.186.

⁶ Millivolts per meter at one kilometer for one kilowatt input power.

⁷ 47 C.F.R. § 73.1515(c)(7).

FEDERAL COMMUNICATIONS COMMISSION
445 TWELFTH STREET SW
WASHINGTON DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

ENGINEER: Jerome J. Manarchuck
TELEPHONE: (202) 418-7226
FACSIMILE: (202) 418-1410
E-MAIL: Jerome.manarchuck@fcc.gov

October 29, 2015

Just Because, Inc.
327 Union Avenue
Framingham, MA 01702

Re: Just Because, Inc.
WGFP (AM), Webster, MA
Facility Identification Number: 50232
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed August 26, 2015, on behalf of Just Because, Inc. ("JBI"). JBI requests special temporary authority ("STA") to operate Station WGFP(AM) with temporary facilities.¹ In support of the request, JBI states that station WGFP(AM) is currently operating with reduced power from a cylindrical base insulated monopole pursuant to STA from the same location as it previously operated pursuant to the station's license.

JBI is filing this new request for STA in order to continue to operate the station in a manner similar to the current STA but from a monopole component of a new HEBA that will conduct field strength surveys on 940 kHz, the same licensed facility as the station, pursuant to Section 73.1515 of the Commission's rules. Additionally, JBI seeks authority to operate the station pursuant to STA on the same parcel of land but approximately 130 feet from the current facility.

Accordingly, the request for STA IS HEREBY GRANTED. Station WGFP(AM) may operate with the following facilities:

Frequency	940 KHz
Geographical Coordinates	42° 03' 17" NL, 71° 49' 59" WL (NAD 1927)
Hours of operation	Daytime/Nighttime
Operating power	Not to exceed 1 kilowatt daytime/4 watts nighttime
Antenna type	Cylindrical base insulated monopole
Overall height	14.8 meters

It will be necessary to further reduce power or cease operation if complaints of interference are received. JBI must notify the Commission when licensed operation is restored.² JBI must use whatever means are necessary to protect workers and the public from exposure to radio frequency radiation in excess of the Commission's exposure guidelines. See 47 CFR § 1.1310.

¹ WGFP(AM) is licensed for operation on 940 kHz with 1 kilowatt daytime and 4 watts nighttime, employing a nondirectional antenna (ND-2-U).

² See 47 CFR §§ 73.45(c), 73.51, 73.61(b).

This authority expires on **April 27, 2016**.

STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, requests for extension of STA will be granted only where the licensee can show that one or more of the following criteria have been met:

- Restoration of licensed facilities is complete and testing is underway;
- Substantial progress has been made during the most recent STA period toward restoration of licensed operation; or
- No progress has been made during the most recent STA period for reasons clearly beyond the licensee's control, and the licensee has taken all possible steps to expeditiously resolve the problem.

Sincerely,



Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Brad C. Deutsch, Esq. (via email only)