

JUSTIFICATION FOR STA

Beginning on April 15, 2011, KVTA began operating at night with approximately 65% of its authorized nighttime power. Gold Coast Broadcasting LLC ("Gold Coast") first notified the FCC of this power reduction by letter on April 22, 2011, and subsequently filed an engineering STA request for the power reduction. The FCC granted this request on May 20, 2011.

The STA to operate KVTA at reduced nighttime power was necessitated by the fact that one of the stations nighttime monitoring points was observed to be in excess of the required limit. As phaser adjustments did not rectify the issue, the station reduced its nighttime power to 648 watts in order to ensure that the monitoring point remained within tolerance.

Since the grant of the first STA, Gold Coast found and repaired minor defects in the AM Towers' ground system, measured the sample lines, replaced a defective current transformer in the tuning unit for Tower #2, and cleaned the tuning units for all three Towers in the KVTA array. However, these maintenance and repair measures did not solve the nighttime power problem.

Gold Coast was set to begin an investigation of the effects of development in the area since the station originally went on the air, including the construction of acres of buildings and a high tension power grid that now runs parallel to the nighttime monitoring point in question. Before this investigation could proceed, however, another incident occurred that caused more severe disruption to both the station's daytime and nighttime patterns: While plowing on land adjacent to the station's transmitter site a farmer mistakenly crossed over a designated boundary and tore up at least 50% of the ground system of Tower #3. This damage sent readings at the station's daytime and nighttime monitoring points in excess of licensed values. To bring these readings within licensed values, Gold Coast has had to reduce daytime power from 10 kW to 4.6 kW and further reduce nighttime power from 1 kW to 136 watts.

Gold Coast is now confronted with a much more extensive repair project. A large portion of the Tower #3 ground system will have to be excavated and replaced. The transmission and sample lines for Tower #3 will also have to be exposed, checked for damage and repaired as necessary. Only after this recent damage is repaired can Gold Coast return to its investigation of the station's minor nighttime power problem.

Accordingly, Gold Coast is requesting a further STA to operate the station at reduced daytime and nighttime powers while it makes the necessary repairs to KVTB's ground system. A grant of this request would permit KVTB to continue to provide service to the public at the reduced powers specified herein.