

**ENGINEERING SPECIAL TEMPORARY AUTHORITY
KUSF-LP, SAN FRANCISCO, CALIFORNIA
CHANNEL 241, FACILITY ID 196917**

World Peace Through Technology Organization ("WPTTO") here within requests an Engineering STA for operation at a temporary broadcast site to continue serving its community due to limiting circumstances outside of its control. WPTTO believes there is good cause to grant a temporary facility and that maintaining the license of KUSF-LP is in the public interest.

BACKGROUND

After being short-spaced by co-channel translator permit K241DC San Francisco, the licensee had to cancel its plan to serve its target population to the south from its current area in Marin County. Because of this short spacing, the amount of available sites was limited since all open space on the Marin peninsula is park land, and the rest is high density commercial or residential area that cannot accommodate second adjacent non-zero population waivers. WPTTO found one site availability at a water tower in Sausalito and filed for a construction permit. Upon final preparation to co-locate via modification FCC File No. 0000129906, the site management company recently cited additional stipulation that it wanted site leasers to mount antennas to the side/plush to the tower metal tank. This will not work for FM broadcasting.

REQUEST FOR TEMPORARY OPERATIONS

Facility needs to return to air by December 29, 2021 to retain its license via BESTA-20210628AAH, in accordance with 47 U.S.C. § 312(g). Licensee proposes returning to air at a temporary location within its service area until it can negotiate accommodations to co-locate within the proposed permit site proximity without interference from the tank.

WPTTO believes the aforementioned situation constitutes extraordinary circumstances beyond the control of the licensee, permitting restoration or relocation of existing facilities to continue communication service, which is consistent with 47 C.F.R. § 1.913. The proposed site is close to the licensed site and meet the four-pronged prerequisite for a site, meaning (A) temporary site unworkability was beyond the control of license (B) the service continues programming to the community of license, (C) the temporary site is the closest site found, (D) and the temporary site does not involve the construction of a tower.

The public interest is furthered in the grant of this Engineering STA because this is a LPFM facility proposed for use by the community and high school for where there are very few radio services devoted for this use. LPFM station and second adjacent channels have stringent permitting situations where there is a paucity of available sites that work. Furthermore, the facility needs to return to broadcast to retain the license.

The licensee has a plan in place for restored service via currently-granted construction permit. Temporary broadcast for this Engineering STA would like to commence by December 19, 2020.

ENGINEERING

KUSF-LP is licensed at 37° 52' 30.0" N, 122° 31' 14.6" W NAD 83 with HAAT of -57.4 meters, therefore licensed for maximum ERP facility of 0.017 watts, projecting a 5.624 km 60 dBu contour per <https://www.fcc.gov/media/radio/fm-and-tv-propagation-curves> (Figure 1). WPTTO respectfully requests the FCC to authorize a temporary facility at the closest site found at 37° 53' 55.6" N, 122° 32' 20.1" W NAD 83 at 0.004 kW. This is demonstrated with the red 60 dBu contour in Figure 1. The proposed temporary site's broadcast fits within the licensed primary contour. As seen below, the chosen site was proposed to maintain service to the majority of the population within the station's service area.

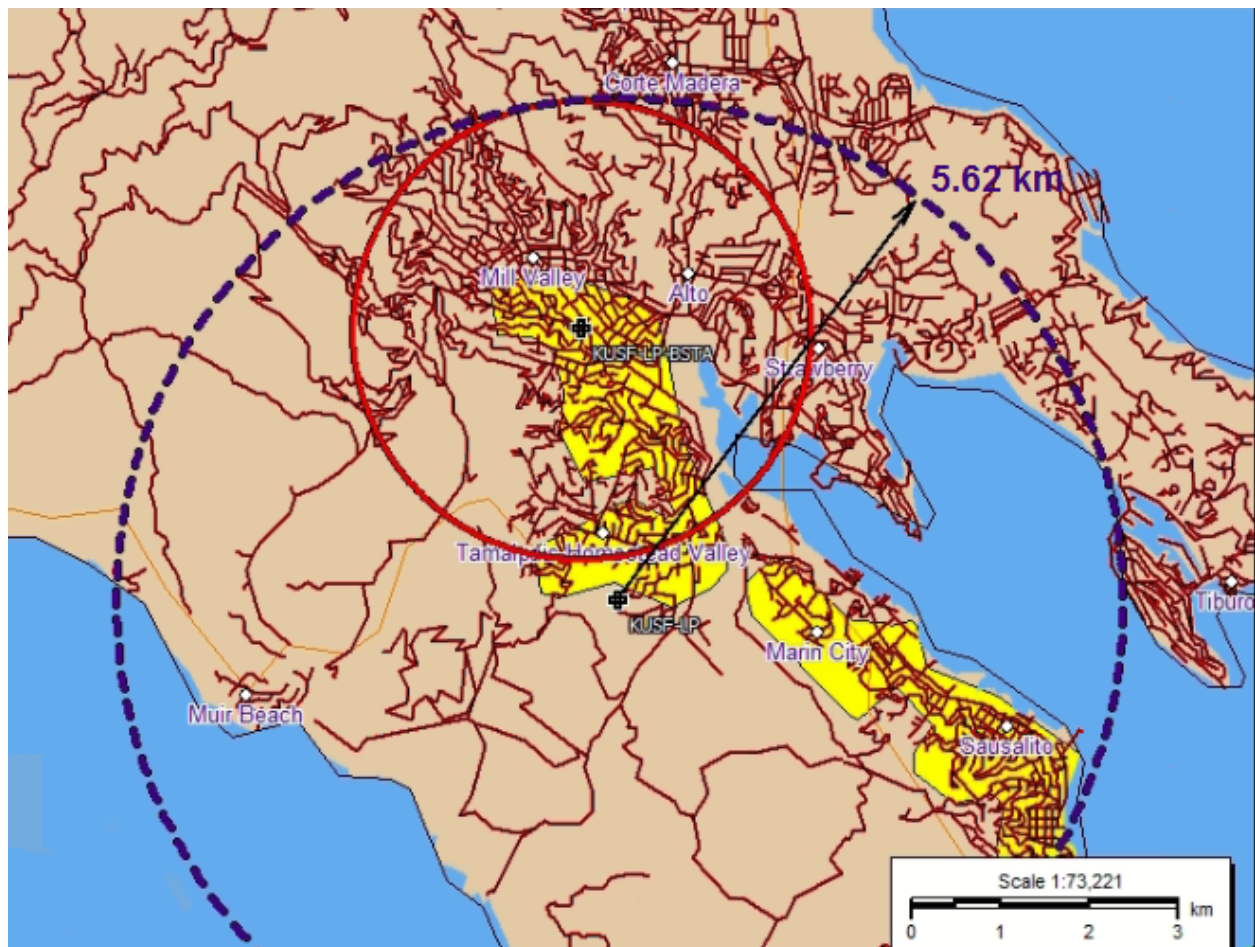


Figure 1: Proposed temporary broadcast (red) and licensed (blue).

PARAMETERS

Channel	241
New Location:	37 52' 17.7" N, 122 32' 03.0" W (NAD 27) 37 53' 55.6" N, 122 32' 20.1" W (NAD 83)
Antenna Ground	5 m
Building AGL	7 m
Mast	7 m
Mast + Building AMSL (COR)	14 m AGL / 19 m AMSL
Total Height	15 m AGL / 20 m AMSL
HAAT	-57.4 m
Power	0.004 kW
Omni Antenna:	CFM-95SL

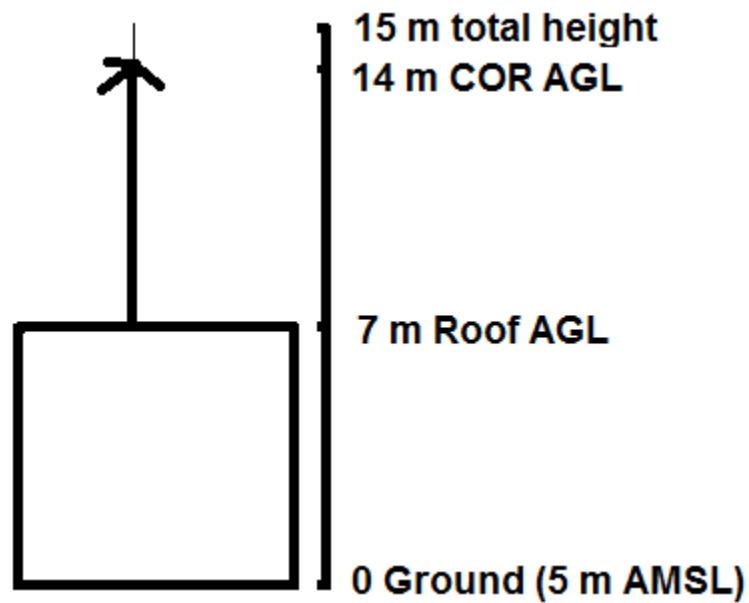


Figure 2: Set-up. Antenna mounted to structure roof

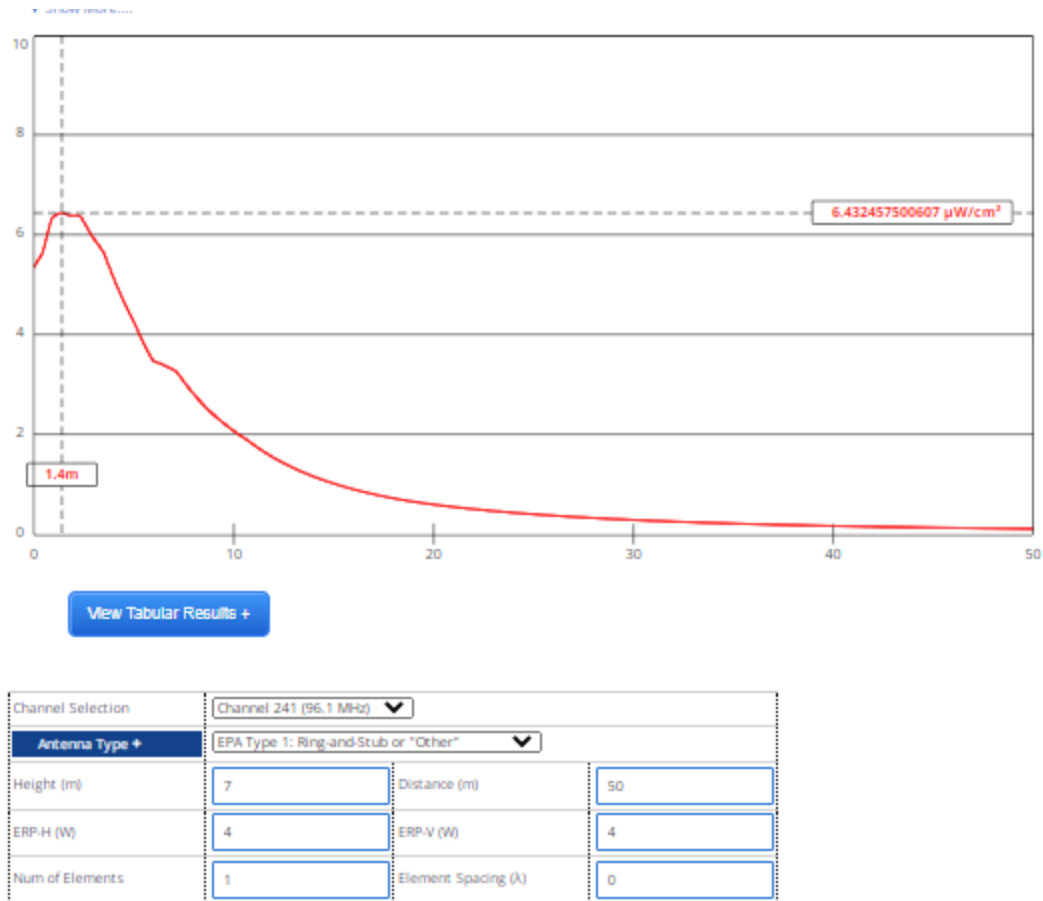


Figure 3: Non-ionizing radiation projection

A worst-case scenario emitter antenna was used to gauge the maximum RF for the proposal in OET program FM Model for Windows. RF exposure on the roof is $6.4 \mu\text{W}/\text{cm}^2$. The maximum predicted RF exposure is less than 5% of the FCC Maximum Permissible Exposure (MPR) for $200 \mu\text{W}/\text{cm}^2$ for uncontrolled environments. 47 C.F.R. § 1.1307(b)(3) exempts applicants from preparing an Environmental Assessment when predicted exposure levels would be less than 5%.