

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 TWELFTH STREET SW**  
**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
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July 8, 2009

Gary S. Smithwick, Esq.  
Smithwick & Belendiuk, P.C.  
5028 Wisconsin Avenue NW, Suite 301  
Washington, DC 20016

Re: KPUG(AM), Bellingham, Washington  
Facility Identification Number: 58887  
Saga Broadcasting, LLC  
Special Temporary Authorization

Dear Counsel:

This is in reference to the request filed January 9, 2009, on behalf of Saga Broadcasting, LLC (Saga). Saga requests further extension of the special temporary authority (STA) granted on February 6, 2004, to operate Station KPUG with parameters at variance from licensed values and/or reduced power while maintaining monitor points within licensed limits.<sup>1</sup> In support of the request, Saga provides a report of its progress toward restoring licensed operation. Saga states that it has engaged a consulting engineer to evaluate its antenna system for a Method of Moments ("MOM") proof of performance, pursuant to new rules adopted in MM Docket No. 93-177. Saga states that it is hopeful that a MOM proof will enable it to demonstrate proper adjustment of its directional antenna pattern, despite adverse environmental factors which have stymied its efforts for several years.

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.

Our review indicates that the licensee has made progress toward restoration of licensed

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<sup>1</sup> KPUG is licensed for operation on 1170 kHz with 10 kilowatts daytime and 5 kilowatts nighttime, employing a directional antenna during nighttime hours only. (DA-N-U).

operation, but additional time is required for completing the work. Thus, extension of STA is warranted.

Accordingly, the request for extension of STA IS HEREBY GRANTED. Station KPUG may continue to operate with parameters at variance from licensed values and/or reduced power while maintaining monitor points within licensed limits. It will be necessary to further reduce power or cease operation if complaints of interference are received. Saga 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.

This authority expires on **January 8, 2010**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles N. Miller".

Charles N. Miller, Engineer  
Audio Division  
Media Bureau

cc: Saga Broadcasting, LLC