

# ***REQUEST FOR SPECIAL TEMPORARY AUTHORITY***

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AM BROADCAST STATION KKZZ  
PORT HUENEME, CALIFORNIA  
1520 kHz  
FACILITY ID: 25091

GOLD COAST BROADCASTING LLC

DECEMBER, 2015

## **REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

The following engineering statement has been prepared for **Gold Coast Broadcasting LLC** ("Gold Coast"), licensee of AM broadcast station KKZZ at Port Hueneme, California, and is in support of their request for special temporary authority to operate that facility with parameters at variance.<sup>1</sup>

In January of 2015, Gold Coast requested authority to remain silent, which was subsequently extended in November of 2015.<sup>2</sup> The request to remain silent was necessitated by severe damage to the KKZZ antenna system, which resulted from agricultural operations at the site. Part of the KKZZ transmitter site is utilized for the growing of strawberries, and the working of the soil at this location resulted in the destruction of a significant portion of the ground system. Additionally, these operations at the site caused damage to the transmission lines feeding the towers due to apparently poor construction methods implemented by previous licensees of the facility. Finally, the potential exists for damage to the sample lines.

Due to this significant level of destruction to the array, Gold Coast took the station dark in order to assess facility damage, and to effect repairs. As was indicated in the STA extension request, the transmission lines had been replaced by late summer of 2015. At that time, the Staff was also advised that repairs to the ground system had been completed. Since late summer, Gold Coast has been concentrating efforts on additional required repairs to the transmitter as well as repairs to the control and power wiring between the transmitter building and the towers. A sufficient level of repairs has been completed at this time to restore the station to operation.

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<sup>1</sup> The Facility ID for KKZZ at Port Hueneme, California is 25091.

<sup>2</sup> See FCC File Nos. BLSTA-20150120AIN and BLESTA-20150810ADJ.

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Although restoration of operation is now possible, the integrity of the sampling system continues to remain a concern. As a result, Gold Coast respectfully requests a special temporary authority to operate KKZZ with parameters at variance for a period of no less than 180 days in order to complete assessment and repairs if necessary to the sampling system. While operating with parameters at variance, Gold Coast will maintain monitor points on both the daytime and nighttime patterns within authorized limits.

Upon completion of the repairs to the sample system Gold Coast will either submit a partial proof of performance, or request a change from a traditional proof of performance to a Method of Moments proof based on computer modeling. The later method may become necessary due to observed power line construction in the vicinity combined with the high frequency, and by extension relatively short wavelength, of KKZZ. All such submissions will comply fully with the rules and procedures of the Commission in effect at that time.

The requested special temporary authority would be in the public interest, as it would allow KKZZ to return to operation. KKZZ is the only station licensed to Port Hueneme, California. Its operational restoration, even in the temporary condition of parameters at variance, will provide full-time local service. Since Gold Coast will maintain monitor points with authorized limits, interference to other facilities is not expected to occur.

The proposed special temporary authority would not constitute a significant environmental impact, and is exempt from environmental processing. The restoration of operation with parameters at variance, and related additional repairs, would not increase the existing

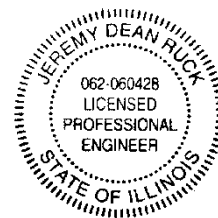
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environmental impact already present from the facility. Additionally, Gold Coast certifies that it will coordinate with all other users of the site to ensure that workers and other persons are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power or cessation of operation.

The preceding statement has been prepared by me, or under my direction, and is true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2017

Jeremy D. Ruck, PE  
December 8, 2015

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