

Comprehensive Technical Exhibit

Malkan Interactive Communications, LLC.
KEYS (Am) Corpus Christi, Texas FID# 39,715

Request for Special Temporary Authority

August 17, 2016

Malkan Interactive Communications, LLC. licensee of KEYS (Am) Corpus Christi, Texas (FID# 39,715) requests Special Temporary Authority to operate at variance with it's license.

KEYS operates full time on 1440 kHz in Corpus Christi, Texas. KEYS is non-directional by Day with 1,000 watts on a 146 degree tall tower. At night the station has 1,000 watts into a four tower directional antenna with the 146 degree day tower plus three other 106.5 degree towers.

The tower site is in west Corpus Christi, Texas, near a ship channel, off of the Gulf of Mexico. The area has high humidity, wind blows with salty moisture, and the area's oil, gas and chemical refinery operations put sulfur and other compounds into the air. Metals decompose in this environment. Control and sample cables and copper ground systems are buried in swampy soil a few feet above sea level. The present site has been used since at least 1947. The last major work (installation of a new phasing system) was around 1971. Work since has been maintenance and essential repairs.

KEYS has been rebuilding the site for several years. Two of four towers have been replaced, the others rebuilt. Work has been done to update the sample system and control systems. Work has reached a point where we will need more than the occasional overnight or (shorter than) ten day window to make individual system changes.

KEYS asks permission to operate at night using the licensed day tower at night. Power will be reduced from 1,000 watts to 250 watts per Sections 73.1680(b)(1). No site change is requested, nor will there be any temporary construction. Fencing is adequate for the 1,000 watts so an extra margin of safety will be allowed at reduced power.

For caution's sake, we ask that this STA be as long as possible. Thank you for your consideration.

David Stewart
Moving Target Consulting Works
214-998-2830
David@MovingTarget.Consulting