



Federal Communications Commission
Washington, D.C. 20554

February 26, 2024

Lotus Seattle Corp.
3301 Barham Boulevard
Los Angeles, CA 90068

Re: Lotus Seattle Corp.
KNWN(AM), Seattle, WA
Fac. ID No.: 21647
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed February 23, 2024, on behalf of Lotus Seattle Corp. ("LSC"). LSC requests special temporary authority ("STA") to operate station KNWN(AM) with emergency antenna facilities during nighttime hours.¹

In support of the request, LSC states that due to an unidentified problem, the nighttime directional antenna is out of tolerance. Therefore, LSC requests STA to operate during nighttime hours using the licensed daytime non-directional antenna at a reduced power of 12.5 kilowatts (25% of licensed power) while the antenna problem is identified and repaired. No changes are proposed the daytime operation.

Section 73.1680 of the Commission's rules provide for operation with emergency antenna facilities provided that an informal request for continued use of an emergency antenna is filed with the Commission within 24 hours. In particular, Section 73.1680(b)(1) states that AM stations may use a horizontal or vertical wire or a nondirectional vertical element of a directional antenna as an emergency antenna. AM stations using an emergency nondirectional antenna or a horizontal or vertical wire pursuant to this section, in lieu of authorized directional facilities, shall operate with power reduced to 25% or less of the nominal licensed power, or, a higher power, not exceeding licensed power, while insuring that the radiated field strength does not exceed that authorized in any given azimuth for the corresponding hours of directional operation.

Accordingly, the request for STA IS HEREBY GRANTED.² Station KNWN(AM) may operate non-directionally during nighttime hours from its licensed site, with a reduced nighttime power not to exceed 12.5 kilowatts. It will be necessary to further reduce or cease operation if complaints of interference are received. KNWN(AM) 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 **August 26, 2024**.

¹ KNWN(AM) is licensed for operation on 1000 kHz with a daytime and nighttime power of 50 kilowatts, employing a directional antenna pattern at night (DAN-U).

² Periods of operation pursuant to this STA shall be recorded in the station's records (see 47 CFR § 73.1820). The records shall include start/stop dates and times of such operation. These log entries must be maintained for a minimum of two years as specified in 47 CFR § 73.1840(a), unless a longer retention period is requested by the staff. Periods of operation may be subject to independent verification that they in fact occurred.

STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, 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.

Sincerely,

A handwritten signature in dark ink, reading "Jerome J. Manarchuck". The signature is fluid and cursive, with the first name "Jerome" and last name "Manarchuck" clearly legible.

Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Eileen Breslin, Esq. (via email only)
Thomas S. Gorton, P.E. (via email only)