

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In re	)	
	)	
Radio License Holding SRC LLC	)	FCC File No. BESTA-20160404ACG
	)	FCC Facility ID No. 51188
Request for Extension of Special	)	
Temporary Authorization	)	
KTCT(AM), San Mateo, California	)	

To: Office of the Secretary  
Attn: Audio Division, Media Bureau

**PETITION FOR RECONSIDERATION**

Radio License Holding SRC LLC (“RLH”), licensee of radio station KTCT(AM), San Mateo, California (“KTCT”), acting pursuant to 47 U.S.C. § 405 and Section 1.106 of the Commission’s rules, 47 C.F.R. § 1.106, hereby seeks reconsideration of an action taken by the FCC’s Audio Division, Media Bureau (the “Bureau”), by letter dated May 26, 2016 (the “Letter”), dismissing the above-captioned request filed April 4, 2016 (“April 4th Request”) to extend the special temporary authorization (File No. BSTA-19990309WX) (“Original STA”) for KTCT.<sup>1</sup> For the reasons stated herein, RLH requests that the Bureau grant this Petition for Reconsideration (“Petition”), reinstate the April 4th Request to extend the Original STA *nunc pro tunc*, and accept the “Extension of Existing Engineering STA” (File No. BESTA-20160627AAZ) which has been filed with the Commission today (“Amendment”), a copy of which is annexed hereto as Exhibit A. In support of this Petition, the following is stated:

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<sup>1</sup> Sacred Heart Radio, Inc. (“Sacred Heart”), the licensee of co-channel station KBLE, Seattle, Washington, filed an Informal Objection against the April 4th Request on April 7, 2016. RLH initially (and incorrectly) believed that KTCT’s Original STA operation would cause prohibited interference to KBLE and therefore RLH requested the withdrawal of its April 4th Request on May 17, 2016.

## **I. Background.**

Station KTCT is licensed to operate on 1050 kHz with 50 kW during the day and 10 kW at night, with different directional patterns during the day and nighttime. File No. BL-19991028AFY. On March 9, 1999, KTCT requested its Original STA to operate with its authorized daytime facilities during nighttime hours (File No. BSTA-1990309WX), but utilizing only four of the towers in KTCT's five-tower array. The Original STA request was filed due to the unlawful operation of co-channel station XED, Mexicali, Mexico, and was made possible by the reduced operation of Class A co-channel station XEG, Monterey, Nuevo Leon, Mexico. The grant of the Original STA was made possible only through a negotiated effort by the FCC with Mexico's Secretaria De Comunicaciones Y Transportes ("SCT").

The Original STA authorized KTCT to operate with a power level of 50 kW. The 50 kW of power did not create an impermissible level of interference to any U.S. station, but resulted in an overlap over Mexican territory to the authorized skywave protected contour of station XEG in Monterey, Mexico. However, as demonstrated in the Engineering Statement prepared by Hatfield & Dawson contained in Exhibit A hereto, XEG does not operate with its internationally-authorized power level. Instead, XEG apparently operates with approximately only 10 kW. Therefore, there is no overlap with XEG's actual skywave contour due to its relatively low operating power. Amendment, Exhibit 34 ("Engineering Statement") at 1 and n.1.

In an effort to further enhance KTCT's operation, a former licensee of KTCT previously arranged for the license of first-adjacent channel station KPAY, 1060 kHz, Chico, California ("KPAY"), to be cancelled. The elimination of KPAY allows KTCT to employ a much more desirable daytime radiation pattern. An undesirable effect of the eliminating KPAY, however, is that the station no longer is present to radiate a substantial signal toward Hawaii. Consequently,

KTCT's 50 kW STA operation enters into the nighttime RSS calculation of first-adjacent channel station KIPA, 1060 kHz, Hilo, Hawaii ("KIPA"), which previously had a much higher interference threshold due to KPAY. As demonstrated in the attached Engineering Statement, the contribution by KTCT's STA operation toward KIPA can be reduced below the allowable threshold by reducing the power from 50 kW to 35 kW, a difference of only 1.5 dB. Engineering Statement at 2.

**II. A Grant of this Petition and Acceptance of the Amendment Would Serve the Public Interest.**

RLH seeks reconsideration of the Bureau's Letter pursuant to Section 1.106(c)(2) of the Commission's rules, which provides in pertinent part:

(c) In the case of any order other than an order denying an application for review, a petition for reconsideration which relies on facts or arguments not previously presented to the Commission or to the designated authority may be granted only under the following circumstances:

\* \* \* \* \*

(2) The Commission or the designated authority determines that consideration of the facts or arguments relied on is required in the public interest.

47 C.F.R. § 1.106(c)(2).

As reflected in the proposed Amendment, with one exception RLH seeks to operate KTCT at night with the same technical facilities that were authorized by the Commission on June 15, 1999, when it granted the Original STA, and with which KTCT operated for seventeen (17) years until the issuance of the Bureau's Letter. The sole exception is that KTCT would now operate with 35 kW, rather than 50 kW of power. Engineering Statement at 1. The reduced power of KTCT's special temporary authorization ("STA") operation would provide substantial public interest benefits. As demonstrated in the attached Engineering Statement, KTCT would not cause interference to any other U.S. station and, in fact, could be licensed with the proposed

STA facilities but for station XEG in Monterey. *Id.* Moreover, if KTCT were to continue operating pursuant to its Original STA with its previously authorized 50 kW of power, it would radiate substantially less radiation toward at least three (3) co-channel and first-adjacent channel stations than KTCT’s licensed nighttime 10 kW facility (File No. BL-19911028AFY). The reduction in radiation toward those co-channel and first-adjacent channel stations would be reduced even further if KTCT were permitted to operate with the STA facilities requested in the Amendment. Specifically, as demonstrated in the table below, the proposed STA operation reducing KTCT’s nighttime power from 50 kW to 35 kW would reduce KTCT’s radiation toward each of the following stations by another 16%. Engineering Statement at 2 and n.2.

Station	Community of License	50 kW STA Signal Strength	Licensed Nighttime 10 kW Signal Strength	Proposed 35 kW Signal Strength
KBLE(AM)	Seattle, WA	311 mV/m	354 mV/m	261 mV/m
KFOY(AM)	Sparks, NV	142 mV/m	336 mV/m	119 mV/m
KFIO(AM)	Dishman, WA	205 mV/m	395 mV/m	172 mV/m

The substantial reduction in radiation toward each of the above co-channel and first-adjacent channel stations that would result from KTCT’s STA operation demonstrates that the reinstatement *nunc pro tunc* of RLH’s April 4th Request, acceptance of the proposed Amendment, and a grant of this Petition are consistent with Commission precedent. *In Re Applications of Eastern Broadcasting Co.*, 55 FCC 2d 276, 277 (1975) (full Commission permitted an applicant to submit curative ascertainment showing on reconsideration, “waived” Section 1.106(c)(2) of the rules, and granted reconsideration petition). *See In the Matter of City of San Diego*, 17 FCC Rcd 20331, 20334-20336 (WTB 2002) (where former city employee misrepresented status of city’s licenses and thereby hampered licensee’s effort to file a timely

renewal application for its microwave authorization, Bureau granted reconsideration pursuant to Section 1.106(c)(2) and accepted facts not previously presented to the Commission).<sup>2</sup>

The facts in this proceeding are analogous to those in *Eastern Broadcasting Co.* The full Commission noted that Eastern Broadcasting (“Eastern”) had prosecuted its application at hearings over a “protracted period of time,” no additional hearings would be required if it were to accept Eastern’s revised ascertainment showing, and there were no competing applicants that would be prejudiced by the grant of Eastern’s application. 55 FCC 2d at 277. As demonstrated above, KTCT’s Original STA has a long and protracted history involving negotiations between the FCC and Mexico’s SCT. It would serve no useful purpose – and would greatly disserve the public interest – to require RLH to start the protracted process of seeking to obtain Mexican clearance all over again, especially when there is no guarantee that RLH would be able to obtain the same approvals that KTCT’s former licensee previously obtained with respect to Mexican stations XED and XEG, one of which continues to operate unlawfully and the other is operating with only approximately 10 kW of power.

Further, as demonstrated in the attached Engineering Statement, the STA operation proposed in the Amendment (i) would not cause interference to co-channel station KBLE, Seattle, Washington (“KBLE”), and (ii) the signal radiated by KTCT toward KBLE would be substantially less than that of KTCT’s licensed nighttime 10 kW facility. Accordingly, despite the filing of the Informal Objection, RLH believes that Sacred Heart will not oppose this Petition

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<sup>2</sup> See also *Fall River Public School District Fall River, MA/Schools and Libraries Universal Service Support Mechanism*, DA 13-2055 (Wireline Competition Bureau 2013) (in granting reconsideration pursuant to Section 1.106(c)(2), Bureau accepted evidence demonstrating that auction applicant had selected the lowest price E-rate vendor); *Mark Van Bergh, Esq.*, 26 FCC Rcd 15135 (MB 2011) (granted reconsideration pursuant to Section 1.106(c)(2) for the limited purpose of considering additional evidence regarding site availability).

and/or the proposed Amendment.<sup>3</sup> As in *Eastern Broadcasting*, there are no licensees (or applicants) that would be prejudiced by the grant of this Petition and acceptance of the Amendment. Therefore, in accordance with Section 1.106(c)(2) of the Commission's rules, acceptance of the Amendment would serve the public interest.

### **III. Proposed STA Operation.**

As stated above, the KTCT STA has been made necessary to overcome interference caused by the unlawful operation of co-channel station XED, Mexicali, Mexico. The Amendment annexed hereto, which has been filed separately with the Commission today, is intended to amend the engineering contained in the Original STA. The technical facilities requested in the Amendment are identical to those contained in the Original STA, with the exception that the Amendment proposes to reduce the power level from 50 kW to 35 kW. Engineering Statement at 1.

RLH requests authorization to operate KTCT at the station's presently licensed transmitter site with the directional antenna pattern specified in the Engineering Statement contained in the Amendment annexed hereto. As stated therein, no tower construction or modification will be required to implement the nighttime operation proposed in the Amendment.

As demonstrated in the accompanying Engineering Statement, KTCT's proposed 35 kW STA operation (i) will not enter the 25% RSS calculation of any licensed domestic or Mexican station; and (ii) will provide skywave protection to first-adjacent channel stations WHO, 1040 kHz, Des Moines, Iowa, and KYW, 1060 kHz, Philadelphia, Pennsylvania. Engineering

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<sup>3</sup> Sacred Heart filed its Informal Objection under the erroneous belief that KTCT's Original STA operation would cause prohibited interference to KBLE. Informal Objection at 2-3. This Petition and accompanying Amendment demonstrate not only that Sacred Heart was mistaken, but as stated above, KBLE would actually receive substantially more radiation from KTCT's licensed nighttime 10 kW facility than the proposed STA operation.

Statement at 1. Further, there currently are no co-channel Class A stations operating in either the U.S. or Canada. *Id.*

WHEREFORE, in view of the foregoing, RLH respectfully requests that this Petition be granted, that the April 4th Request to extend the Original STA be reinstated *nunc pro tunc*, and that the Amendment (File No. BESTA-20160627AAZ), which has been filed with the Commission today and a copy of which is annexed hereto as Exhibit A, be accepted.

Respectfully submitted,

RADIO LICENSE HOLDING SRC LLC

By   
Andrew S. Kersting

Its Corporate Counsel

June 27, 2016

## **EXHIBIT A**

### **Extension of Existing Engineering STA** **(File No. BESTA-20160627AAZ)**



Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
<b>Extension of Existing Engineering STA</b>  Read Instructions/FAQ before filling out form		FOR COMMISSION USE ONLY FILE NO. - 20160627AAZ

**Section I - General Information**

1.	Legal Name of the Applicant RADIO LICENSE HOLDING SRC LLC		
	Mailing Address 3280 PEACHTREE ROAD, NW SUITE 2300		
	City ATLANTA	State or Country (if foreign address) GA	Zip Code 30305 -
	Telephone Number (include area code) 4049490700		E-Mail Address (if available)
	FCC Registration No 0023756331	Call Sign KTCT	Facility ID Number 51188
2.	Contact Representative (if other than licensee/permittee) ANDREW S. KERSTING		Firm or Company Name CUMULUS MEDIA INC.
	Mailing Address 3280 PEACHTREE ROAD, NW SUITE 2300		
	City ATLANTA	State or Country (if foreign address) GA	ZIP Code 30305 -
	Telephone Number (include area code) 4042606761		E-Mail Address (if available) ANDY.KERSTING@CUMULUS.COM
3.	Purpose: <input type="radio"/> Engineering STA <input checked="" type="radio"/> Extension of Existing Engineering STA      File Number: BSTA - 19990309WX <input type="radio"/> Legal STA <input type="radio"/> Extension of Existing Legal STA		
4.	Service: AM		
5.	Community of License: City: SAN MATEO    State: CA		
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
7.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b>  By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic		<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 33]

	exposure in excess of FCC guidelines.	
8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 34]
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing RICHARD S. DENNING	Typed or Printed Title of Person Signing SENIOR VICE PRESIDENT & GENERAL COUNSEL
Signature	Date (mm/dd/yyyy) 6/27/2016

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

## Exhibits

### Attachment 34

Description
<u>Exhibit 34 – Request for Extension of Special Temporary Authorization</u>

BENJAMIN F. DAWSON III, PE  
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DAVID J. PINION, PE  
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## ENGINEERING REPORT

### APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

KTCT(AM)

1050 kHz

San Mateo, California

Facility ID 51188

35 kW Night

Radio License Holding SRC LLC

June 2016

## Purpose of Application

This Engineering Report has been prepared in support of an application by Radio License Holding SRC LLC ("RLH") to extend the operation of KTCT(AM) under Special Temporary Authority during nighttime hours at a reduced power of 35 kW. This STA operation is necessary to overcome interference caused by the continued unauthorized operation of cochannel station XED, Mexicali, Mexico.

## Allocation Considerations

### Nighttime

The requested nighttime operation of KTCT at 35 kW will not enter into the 25% RSS calculation of any licensed domestic or Mexican operation or application, as demonstrated by the Site to Site RSS Calculations exhibit included in this report. Skywave protection of adjacent channel Class A stations WHO and KYW is demonstrated by the included map. There are no cochannel Class A stations in operation in the United States or Canada. Furthermore, the facilities requested meet the allocation standards specified in the Commission's rules with respect to all domestic facilities.

This application requests extension of the special temporary authority ("STA") originally granted on June 15, 1999, and extended until recently. The facilities requested in the instant application are identical to those previously authorized, with the exception of the reduced operating power.

The STA was authorized to overcome interference to KTCT from an unauthorized operation of cochannel station XED, Mexicali, BCN. The original STA request was approved after acquiescence from the regulatory authority in Mexico as well as class A co-channel station XEG, Monterrey, NL. <sup>#</sup>

As originally authorized with 50 kW, the KTCT STA operation did not cause prohibited nighttime interference to any U.S. station, or to any foreign station, with the exception of the non-

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<sup>#</sup> As noted below, the STA operation overlaps the notified 0.5 mV/m 50% skywave contour of station XEG. However, XEG does not operate with its internationally notified power level, but with only approximately 10 kW, and does not generate a skywave contour of this magnitude.

operating XEG facility. Subsequently, by agreement with the then-owner of DKNSN (1060 kHz, 10 kW, Chico, CA, Facility ID 40844) that station's operations ceased and the license was terminated, to allow improvement in the KTCT daytime service area. However DKNSN was the major contributor to the nighttime RSS limit to station KIPA, Hilo, HI. As a result of the removal of DKNSN from the KIPA RSS calculation, the 50 kW STA operation of KTCT does enter into the 25% RSS calculation.

The contribution by the KTCT STA toward KIPA can be reduced below the allowable threshold by a reduction in power from 50 kW to 35 kW. Therefore the present STA application specifies operation with 35 kW. Operation with this power is completely consistent with the protection of all other stations with the exception of XEG, as described above.

Additionally, operation of the STA by KTCT, even at the previously authorized 50 kW, contributes less signal to the RSS calculations of several other stations than the licensed 10 kW nighttime facility. Reduction of the STA power level will further reduce these contributions.<sup>##</sup>

#### Facilities Proposed

RLH requests authorization to operate KTCT at the presently licensed transmitter site at a power of 35 kW, with the directional antenna pattern specified on the following pages. No tower modification or new tower construction would be required to implement the nighttime operation proposed.

Antenna tower access is restricted by fences with locked gates that are at least 4 meters from the tower bases as required by OET-65. The antenna towers will be posted with warning signs, and all station personnel and contractors will be required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.

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<sup>##</sup> For example the 50 kW STA radiated 142 mV/m vs 336 mV/m for the licensed 10 kW nighttime operation to Sparks, 205 vs 395 to Dishman, and 311 vs 354 toward KBLE. Operation with 35 kW will reduce these contributions by a further 16%.

## Directional Antenna Parameters Requested

Tower#	Ratio	Phase	Spacing	Orientation	Height	ASR#
1	0.402	-95.2	180.0	80.8	76.9°	1012971
2	1.000	126.6	90.0	81.8	76.9°	1012972
3	1.000	0	0	0	76.9°	1012973
4	0.357	-112.7	90.5	253.3	76.9°	1012974

Overall Tower Height: 62.5 meters

Electrical Tower Height: 61 meters

Power: 35 kW

Theo RMS: 1947.4

Std RMS: 2045.9

Location: 37 39 02 N 122 09 02 W

## Site to Site RSS Calculations

Protected Station: KIPA, 1060 kHz - HILO, HI, US [19-41-48 N, 155-03-05 W]  
Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
CKMX/A	1060	1.271	100.0
XEEP/A	1060	1.021	80.3
CB 106-A	1060	0.989	60.7
-----	50%	-----	
HCAK2-A	1060	0.541	28.4
-----	25%	-----	
KYW	1060	0.420	21.2
HJFJ-A	1060	0.348	17.2
KNX	1070	0.333	16.2
XEXXX/A	1060	0.332	16.0
XERDO/A	1060	0.281	13.3
HJMV-A	1060	0.268	12.6
XEG/A	1050	0.251	11.7
*KTCT	1050	0.236	10.9
WLNO	1060	0.227	10.4

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
CKMX/A	1060	1.271	100.0
XEEP/A	1060	1.021	80.3
CB 106-A	1060	0.989	60.7
-----	50%	-----	
HCAK2-A	1060	0.541	28.4
-----	25%	-----	
<b>*KTCT-PRO</b>	<b>1050</b>	<b>0.495</b>	<b>25.0</b>
KYW	1060	0.420	20.6
HJFJ-A	1060	0.348	16.7
KNX	1070	0.333	15.8
XEXXX/A	1060	0.332	15.5
XERDO/A	1060	0.281	13.0
HJMV-A	1060	0.268	12.2
XEG/A	1050	0.251	11.4
WLNO	1060	0.227	10.2

Protected Station: KBLE, 1050 kHz - SEATTLE, WA, US [47-33-49 N, 122-21-35 W]  
Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
CICF/A	1050	8.379	100.0
XEG/A	1050	4.557	54.4
-----	50%	-----	
KFIO	1050	4.075	42.7
CKMX/A	1060	2.717	26.2
CKST/A	1040	2.706	25.2
-----	25%	-----	
*KTCT	1050	2.458	22.2
CFGP/A	1050	2.276	20.1
CKSB/A	1050	1.840	15.9

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
CICF/A	1050	8.379	100.0
XEG/A	1050	4.557	54.4
-----	50%	-----	
KFIO	1050	4.075	42.7
CKMX/A	1060	2.717	26.2
CKST/A	1040	2.706	25.2
-----	25%	-----	
CFGP/A	1050	2.276	20.6
CKSB/A	1050	1.840	16.3
<b>*KTCT-PRO</b>	<b>1050</b>	<b>1.812</b>	<b>15.8</b>

Protected Station: XED/A, 1050 kHz - MEXICALI, BN, MX [32-39-31 N, 115-22-42 W]

Standard: Mexican [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEG/A	1050	15.873	100.0
-----	50%	-----	
XENVA2/A	1050	4.629	29.2
-----	25%	-----	
XENVA2/A	1050	2.820	17.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEG/A	1050	15.873	100.0
-----	50%	-----	
XENVA2/A	1050	4.629	29.2
-----	25%	-----	
XENVA2/A	1050	2.820	17.1
<b>*KTCT-PRO</b>	<b>1050</b>	<b>2.561</b>	<b>15.3</b>

Protected Station: CICF/A, 1050 kHz - VERNON, BC, CA [50-17-20 N, 119-16-26 W]

Standard: Canadian (Figure 4) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
CFGP/A	1050	7.538	100.0
CKSB/A	1050	5.182	68.7
KBLE	1050	4.908	53.7
-----	50%	-----	
KFIO	1050	4.070	39.2
-----	25%	-----	
XEG/A	1050	2.650	23.8
*KTCT	1050	2.186	19.1
KMTA	1050	1.599	13.7
CJNB/A	1050	1.504	12.8

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
CFGP/A	1050	7.538	100.0
CKSB/A	1050	5.182	68.7
KBLE	1050	4.908	53.7
-----	50%	-----	
KFIO	1050	4.070	39.2
-----	25%	-----	
XEG/A	1050	2.650	23.8
KMTA	1050	1.599	14.0
CJNB/A	1050	1.504	13.0
<b>*KTCT-PRO</b>	<b>1050</b>	<b>1.241</b>	<b>10.6</b>

Protected Station: KLHT, 1040 kHz - HONOLULU, HI, US [21-20-10 N, 157-53-33 W]

Standard: FCC Rules (1992 Skywave Propagation Model) [ 10% ]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
CKST/A	1040	2.363	100.0
-----	50%	-----	
WHO	1040	0.881	37.3
-----	25%	-----	
ZYK537-A	1040	0.588	23.3
NEW SANGER	1040	0.492	19.0
TIAC-A	1040	0.324	12.3
OBX40-A	1040	0.294	11.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
CKST/A	1040	2.363	100.0
-----	50%	-----	
WHO	1040	0.881	37.3
-----	25%	-----	
ZYK537-A	1040	0.588	23.3
NEW SANGER	1040	0.492	19.0
<b>*KTCT-PRO</b>	<b>1050</b>	<b>0.459</b>	<b>17.4</b>
TIAC-A	1040	0.324	12.1
OBX40-A	1040	0.294	10.9



KTCT

Freq: 1050 kHz

Class: B

Latitude: 37-39-02 N

Longitude: 122-09-02 W

Power: 35 kW

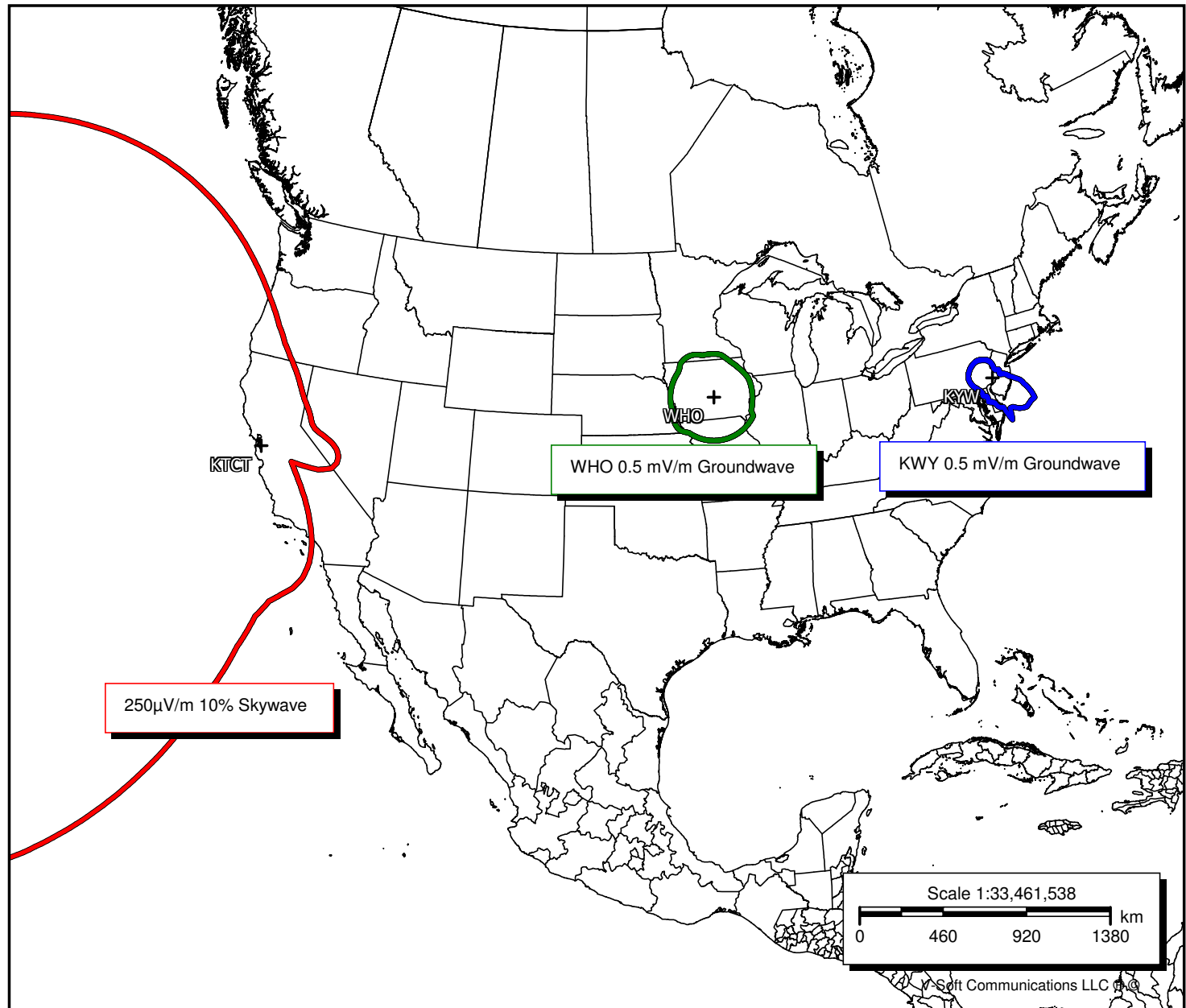
RMS: 1947.432 mV/m @1km

# Towers: 4

# AUs: 0

Skywave Protection  
of Class A Stations

KTCT-STA



250µV/m 10% Skywave

WHO 0.5 mV/m Groundwave

KWW 0.5 mV/m Groundwave

Scale 1:33,461,538

0 460 920 1380 km

Soft Communications LLC

KTCT

Freq: 1050 kHz

Class: B

Latitude: 37-39-02 N

Longitude: 122-09-02 W

Power: 35 kW

RMS: 1947.432 mV/m @1km

# Towers: 4

# AUs: 0

Skywave Protection of  
Class A Station XEG  
with XEG operating  
at 10 kW

KTCT

KTCT 35 kW STA  
25  $\mu$ V/m 10%  
Skywave

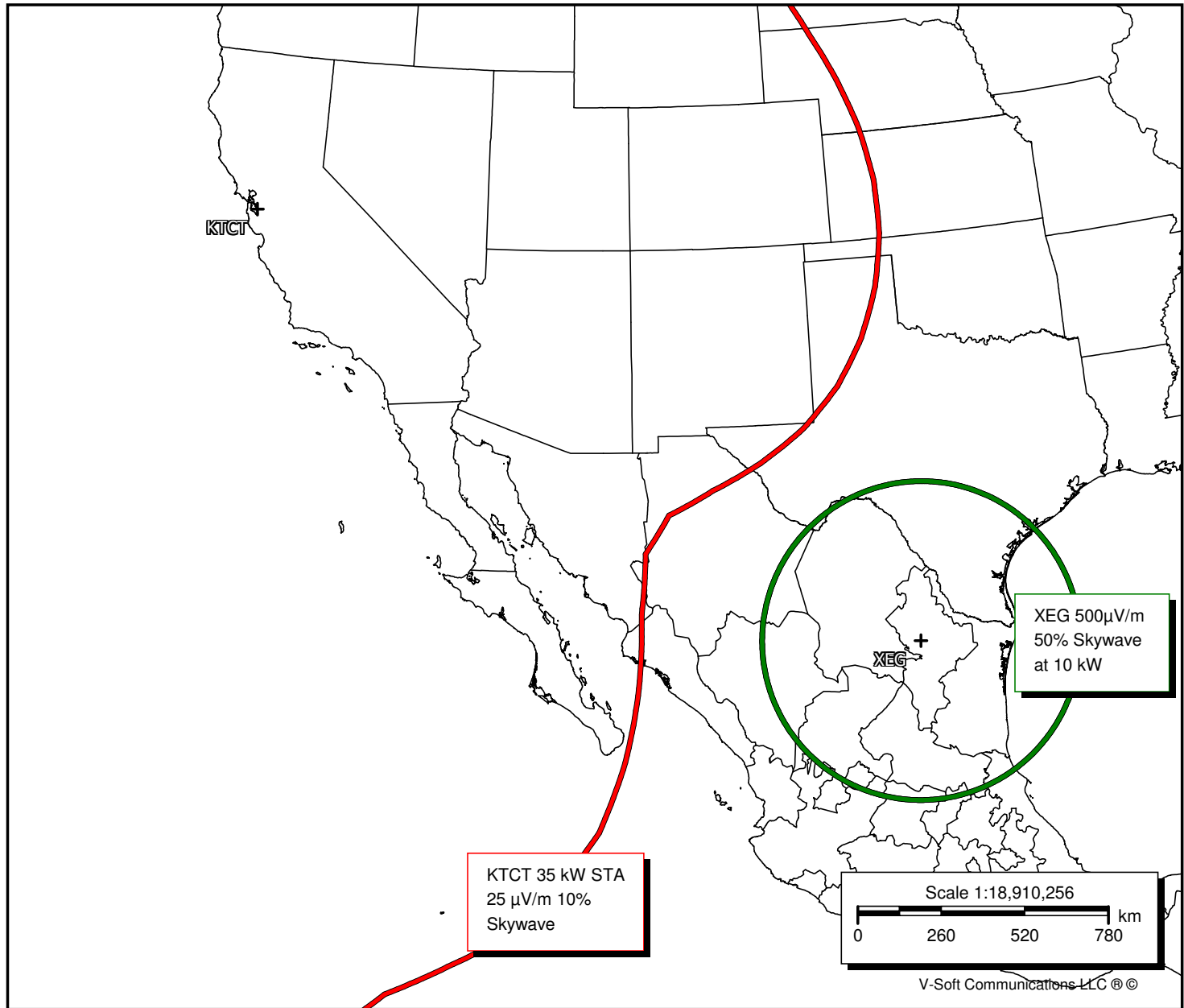
XEG

XEG 500 $\mu$ V/m  
50% Skywave  
at 10 kW

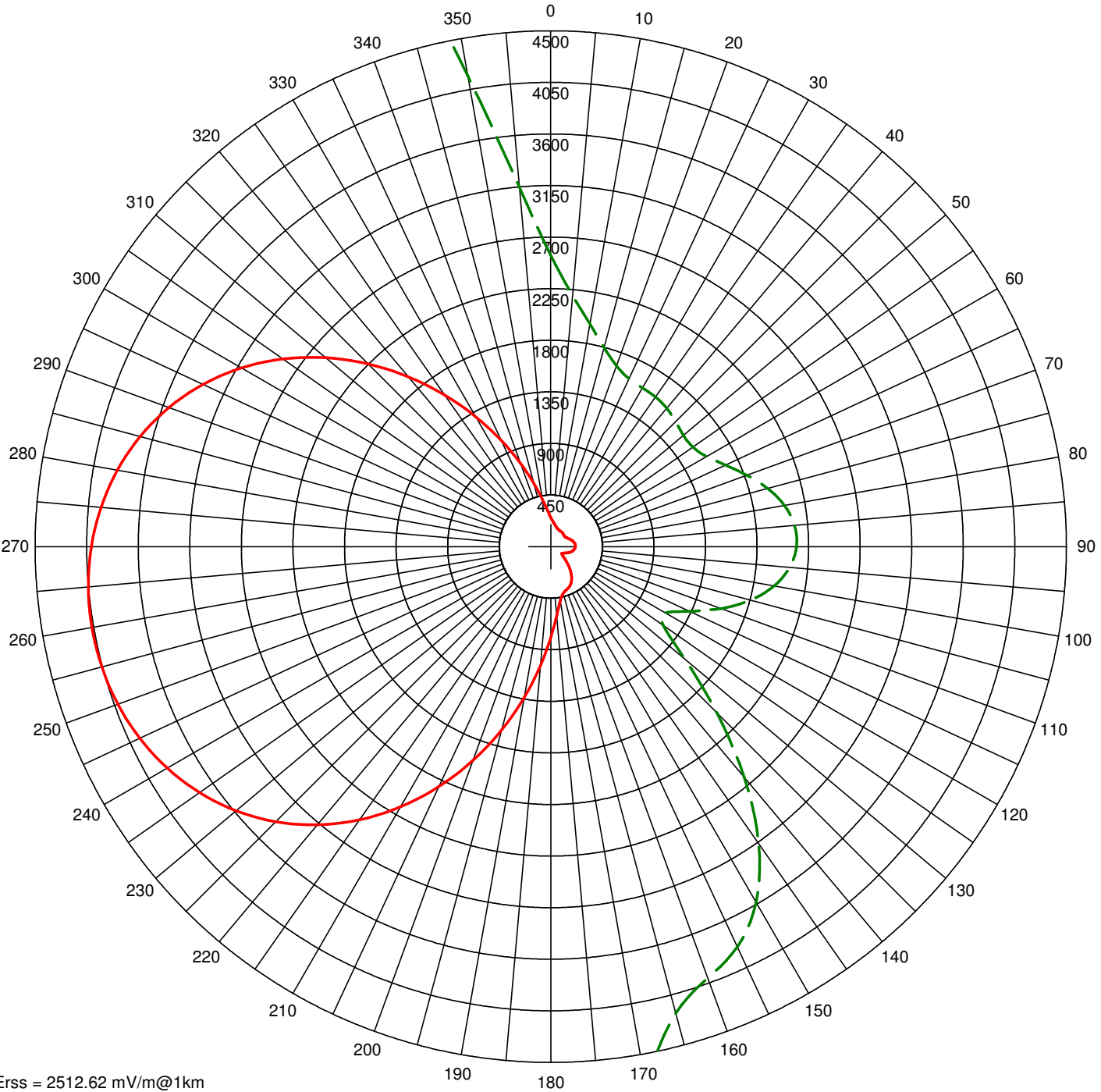
Scale 1:18,910,256

0 260 520 780 km

V-Soft Communications LLC ©



AM Directional Pattern



Erss = 2512.62 mV/m@1km  
Theo RMS: 1947.432 mV/m@1km  
Std RMS: 2045.867 mV/m@1km  
Q: 62.816 mV/m@1km

Standard Horizontal Plane Pattern

— Pattern (mV/m @ 1km)  
- - Pattern X10

#	Field Ratio	Phase (deg)	Spacing (deg)	Orient (deg)	Height (deg)	Ref Switch	TL Switch	A (deg)	B (deg)	C (deg)	D (deg)
1	0.402	-95.2	180.0	80.8	76.9	0	0	0.0	0.0	0.0	0.0
2	1.000	126.6	90.0	81.8	76.9	0	0	0.0	0.0	0.0	0.0
3	1.000	0.0	0.0	0.0	76.9	0	0	0.0	0.0	0.0	0.0
4	0.357	-112.7	90.5	253.3	76.9	0	0	0.0	0.0	0.0	0.0

Call: KTCT  
Freq: 1050 kHz  
SAN MATEO, CA, US  
Hours: N  
Lat: 37-39-02 N  
Lng: 122-09-02 W  
Power: 35.0 kW  
Theo RMS: 1947.43 mV/m@1km  
@ 35.0 kW

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

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
**HOME PAGE:** [www.fcc.gov/mb/audio/](http://www.fcc.gov/mb/audio/)

**ENGINEER:** CHARLES N. (NORM) MILLER  
**TELEPHONE:** (202) 418-2767  
**FACSIMILE:** (202) 418-1410  
**E-MAIL:** [charles.miller@fcc.gov](mailto:charles.miller@fcc.gov)

June 10, 2009

Andrew S. Kersting, Esq.  
Dickstein Shapiro Morin & Oshinsky LLP  
2101 L Street NW  
Washington, DC 20037-1526

Re: KTCT(AM), San Mateo, California  
Facility Identification Number : 51188  
Susquehanna Radio Corporation  
Special Temporary Authorization

Dear Counsel:

This is in reference to the request filed September 25, 2008, on behalf of Susquehanna Radio Corporation ("SRC"), licensee of Station KTCT(AM), San Mateo, California. SRC requests further extension of the special temporary authority ("STA") originally granted on June 15, 1999, and modified on February 11, 2004, to operate Station KTCT with its authorized daytime facilities during nighttime hours in order to overcome interference from a foreign station.<sup>1</sup>

In support of its request for extension, SRC states that the STA was authorized to overcome interference to KTCT from an unauthorized operation of cochannel Station XED, Mexicali, Baja California, Mexico. SRC further states that the interference situation has not changed.

Accordingly, the request for extension of STA IS HEREBY GRANTED, subject to the following condition:

Operation with the facilities specified herein is subject to modification, suspension or termination without right to hearing, if found by the Commission to be necessary in order to conform to the provisions of the registration process of the ITU, or to bilateral or other multilateral agreements between the United States and any other country.

Station KTCT may continue to operate with increased power during nighttime hours in order to overcome interference from the non-compliant operation of Station XED. Operation pursuant to this authority shall be in accordance with the attached Directional Antenna Specifications. It will be necessary to reduce power or cease STA operation if complaints of interference are received. SRC 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 §

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<sup>1</sup> KTCT is licensed for operation on 1050 kHz with 50 kilowatts daytime and 10 kilowatts nighttime, employing different directional antenna patterns during daytime and nighttime hours (DA-2-U).

1.1310.

This authority expires on **December 10, 2009**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles N. Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charles N. Miller, Engineer  
Audio Division  
Media Bureau

Attachment: Directional Antenna Specifications

cc: Susquehanna Radio Corporation

**SPECIAL TEMPORARY AUTHORITY**

**SPECIFICATIONS FOR NIGHTTIME DIRECTIONAL OPERATION OF  
KTCT (AM), San Mateo, CA**

**Frequency:** 1050 kHz      **Nominal Power:** 50 kW      **Antenna Input Power:** 52.6 kW

**Common Point Current:** 32.43 Amperes      **Common Point Resistance:** 50 ohms

**Transmitter site coordinates (NAD 1927):**      37° 39' 02" N, 122° 09' 02" W

**Description of Directional Antenna System:**

<b>Number and Type of Elements:</b>	Five (5) vertical, self-supporting, series-excited steel radiators. (Note: Tower #5 is not used in this pattern.)
<b>Height above Insulators:</b>	61.0 meters (76.9°)
<b>Overall Height:</b>	62.5 meters
<b>Ground System:</b>	120 radials 72 m in length except where intersecting radials are shortened and bonded, plus 120 radials 15.2 m in length, about the base of each tower.
<b>Spacing and Orientation:</b>	With Tower #3 (WC) as a reference, Tower #1 (E) is spaced 180.0° (142.8 m) on a line bearing 80.8° ; Tower #2 (EC) is spaced 90.0° (71.4 m) on a line bearing 81.8°; Tower #4 (W) is spaced 90.5° (71.8 m) on a line bearing 253.3°; Tower #5 (N) is spaced 102.4° (81.2 m) on a line bearing 327.8°.
<b>Theoretical RMS:</b>	2327.6 mV/m at 1 km
<b>Standard RMS:</b>	2445.25 mV/m at 1 km
<b>Q factor:</b>	75.1 mV/m

**SPECIAL TEMPORARY AUTHORITY**

**SPECIFICATIONS FOR NIGHTTIME DIRECTIONAL OPERATION OF  
KTCT (AM), San Mateo, CA**

<b>Tower:</b>	<b>#1(E)</b>	<b>#2 (EC)</b>	<b>#3 (WC)</b>	<b>#4(W)</b>
<b>Theoretical Parameters:</b>				
<b>Field Ratio:</b>	0.402	1.0	1.0	0.357
<b>Phasing (degrees):</b>	-95.2	126.6	0.0	-112.7
<b>Operating Parameters*</b>				
<b>Phase (degrees):</b>	-91.4	125.2	0.0	-109.2
<b>Current Ratio:</b>	0.417	0.906	1.00	0.304

\*As indicated by Potomac Instruments AM-1901 antenna Monitor.

**Antenna sampling system approved under Section 73.68 (b) of the rules.**

**Descriptions Of And Field Intensities At Monitor Points:**

**Direction of 52.5° True North:** North side of Grove Way, west end of Cherryland Park, 200' into park at northwest corner of basketball court. Distance from the transmitter site is 4.83 km. The field intensity at this point shall not exceed **36.0 mV/m**.

**Direction of 122° True North:** Northwest corner of the intersection of Pueblo springs Avenue and Pueblo Lake Avenue, at curb, next to fire hydrant. Distance from the transmitter site is 5.63 km. The field intensity at this point shall not exceed **25.6 mV/m**.

## Statement of Engineer

This Engineering Report, relative to an amendment to an application for Special Temporary Authority for KTCT-AM, San Mateo, CA has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am an engineer in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Oregon.

Signed this 27th day of June, 2016



Thomas S. Gorton, P.E.

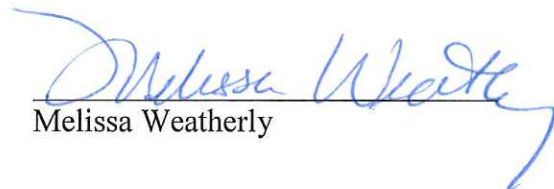


### **CERTIFICATE OF SERVICE**

I, Melissa Weatherly, a paralegal with Cumulus Media Inc., do hereby certify that a copy of the foregoing "Petition for Reconsideration" was sent this 27<sup>th</sup> day of June, 2016 via U.S.

Mail, postage prepaid, to the following:

Dennis J. Kelly, Esq.  
Law Office of Dennis J. Kelly  
P.O. Box 41177  
Washington, DC 20018  
(Counsel to Sacred Heart Radio, Inc.)

  
Melissa Weatherly